

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

In re:	§	Chapter 11
	§	
THE AZTEC FUND HOLDING, INC., <i>et al.</i> , ¹	§	Case No. 24-90436 (CML)
	§	
Post-Effective Date Debtors.	§	(Jointly Administered)
	§	

**FINAL FEE APPLICATION OF MUNSCH HARDT
KOPF & HARR, P.C., AS COUNSEL FOR THE DEBTORS,
FOR THE PERIOD FROM AUGUST 5, 2024
THROUGH AND INCLUDING JUNE 30, 2025**

Complex Case Fee Application Coversheet (Hourly)

Name of Applicant:	Munsch Hardt Kopf & Harr, P.C.	
Applicant's Role in Case:	Counsel for the Debtors and Debtors-in-Possession	
Docket No. of Employment Order:	Docket No. 97	
Interim Application () Final Application (x)	Final Application	
	Beginning Date	End Date
Time period covered by this Application for which interim compensation has not previously been awarded:	August 5, 2024	June 30, 2025
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Yes)		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Yes)		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Yes)		
Do expense reimbursements represent actual and necessary expenses incurred? (Yes)		

¹ The Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, if any, are: The Aztec Fund Holding, Inc. (7839); Aztec OME Holdings, Inc. (1731); OME 2001 Mark Center, LLC (9459); OME Bowie Corporate Center, LLC (2184); OME Lake Vista III & IV, LLC (4040); OME Windward Oaks, LLC (5261); TAF 5775 DTC, LLC (2526); TAF Intellicenter, LLC (0832); TAF Lakeside II, LLC (0253); TAF Pinnacle Park, LLC (3055); TAF Pinnacle Park Land, LLC (4591); and TAF Royal Tech, LLC (6049). The Post-Effective Date Debtors' service address is: Paseo de los Tamarindos 90, Torre 2 - Piso 27, Bosque de las Lomas, CDMX 05120.

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	\$1,669,782.00
Total professional hours covered by this Application:	2,889.90
Average hourly rate for professionals:	\$577.80
Total paraprofessional fees requested in this Application:	\$100,616.50
Total paraprofessional hours covered by this Application:	468.60
Average hourly rate for paraprofessionals:	\$214.72
Total fees requested in this Application:	\$1,770,398.50
Total expense reimbursements requested in this Application:	\$48,174.24
Total fees and expenses requested in this Application:	\$1,818,572.74
Total fees and expenses awarded in all prior Applications:	\$1,611,925.25
Plan Status: The Debtors' plan was confirmed on June 13, 2025 and went effective on June 30, 2025.	
Primary Benefits: Assisting the Debtors with general case administration and strategy; review of monthly operating reports; conduct of sales processes for commercial office buildings; analysis of issues related to and preparation of a combined joint disclosure statement and chapter 11 plan of liquidation; preparation for and attendance at hearings in connection with approval of sales processes and approval and solicitation of combined joint disclosure statement and confirmation of chapter 11 plan; close sales of remaining properties and facilitate Effective Date of the plan.	

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**FINAL FEE APPLICATION OF MUNSCH HARDT
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FOR THE PERIOD FROM AUGUST 5, 2024
THROUGH AND INCLUDING JUNE 30, 2025**

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

Munsch Hardt Kopf & Harr, P.C. (“Applicant” or “Munsch Hardt”) files this *Final Fee Application of Munsch Hardt Kopf & Harr, P.C. as Counsel for the Debtors, for the Period from August 5, 2024 Through and Including June 30, 2025* (the “Application”), and respectfully states as follows:

² The Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, if any, are: The Aztec Fund Holding, Inc. (7839); Aztec OME Holdings, Inc. (1731); OME 2001 Mark Center, LLC (9459); OME Bowie Corporate Center, LLC (2184); OME Lake Vista III & IV, LLC (4040); OME Windward Oaks, LLC (5261); TAF 5775 DTC, LLC (2526); TAF Intellicenter, LLC (0832); TAF Lakeside II, LLC (0253); TAF Pinnacle Park, LLC (3055); TAF Pinnacle Park Land, LLC (4591); and TAF Royal Tech, LLC (6049). The Post-Effective Date Debtors’ service address is: Paseo de los Tamarindos 90, Torre 2 - Piso 27, Bosque de las Lomas, CDMX 05120.

I. SUMMARY OF RELIEF REQUESTED

1. By this Application, Munsch Hardt, as counsel for the above-captioned debtors (collectively, the “Debtors” or “Post-Effective Date Debtors” as applicable), requests entry of an order, substantially in the form attached hereto:

- a. allowing Munsch Hardt on a final basis compensation and reimbursement of expenses in the amount of \$1,818,572.74 for the period from August 5, 2024 through June 30, 2025 (the “Application Period”);
- b. approving on a final basis the allowance of compensation and reimbursement of expenses, including all previous interim allowances of compensation and reimbursement of expenses;
- c. authorizing the Post-Effective Date Debtors to disburse to Munsch Hardt the total amount of \$1,818,572.74, less any amounts previously paid to, or held by, Munsch Hardt; and
- d. granting such other relief as is just and appropriate under the circumstances.

2. In support of the relief requested in this Application, attached hereto are the following exhibits:

- **Exhibit A** – summary of timekeepers
- **Exhibit B** – summary of compensation requested by task category
- **Exhibit C** – summary of expense reimbursement requested by category
- **Exhibit D** – chart of customary and comparable compensation disclosures
- **Exhibit E** – detailed billing statements

II. JURISDICTION AND VENUE

3. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157, and this Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested in this Application are sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), the Procedures for Complex Cases in the Southern District of Texas (the “Complex Case Procedures”), and the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the “U.S. Trustee Guidelines”).

III. PROCEDURAL BACKGROUND

5. On August 5, 2024 (the “Petition Date”), the Debtors filed voluntary petitions for relief in this Court commencing cases (the “Chapter 11 Cases”) under chapter 11 of the Bankruptcy Code. The factual background regarding the Debtors, including their business operations, their capital and debt structures, and the events leading to the filing of the Chapter 11 Cases, is set forth in detail in the *Declaration of Charles Haddad in Support of Chapter 11 Petitions and First-Day Motions* [Docket No. 17] (the “First Day Declaration”), filed on the Petition Date.

6. On the Petition Date, the Court entered an order [Docket No. 12] pursuant to Bankruptcy Rule 1015(b) ordering joint administration of these cases and consolidation for procedural purposes only.

7. No request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases, and no committees have been appointed or designated.

8. On September 12, 2024, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses* [Docket No. 96] (the “Interim Compensation Order”).

9. On March 24, 2025, the Debtors filed their proposed *Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation* (the “Plan”) [Docket No. 387].

10. On March 24, 2025, the Debtors filed their *Motion for Entry of an Order (I) Conditionally Approving Disclosure Statement; (II) Approving Solicitation and Notice Procedures; (III) Approving Forms of Ballot and Notices in connection Therewith; (IV) Approving Combined Hearing Timeline; (V) Approving Equity Auction Procedures; and (VI) Granting Related Relief* [Docket No. 392].

11. On March 25, 2025, the Court entered the *Order (I) Approving Bidding, Notice, and Executory Contract Procedures and (II) Granting Related Relief* [Docket No. 398].

12. On June 12, 2025, the Court held a hearing to consider confirmation of the Plan, and on June 13, 2025, the Court entered the *Order Approving Debtors’ Disclosure Statement and Confirming Debtors’ Joint Chapter 11 Plan of Liquidation* (the “Confirmation Order”) [Docket No. 493].

13. The Effective Date of the Plan occurred on June 30, 2025. *See Notice of (I) Entry of Confirmation Order; (II) Occurrence of Effective Date; (III) Administrative Claims Bar Date; and (IV) Rejection Claims Bar Date* [Docket No. 527].

IV. MUNSCH HARDT’S EMPLOYMENT AND COMPENSATION

14. On August 20, 2024, Debtors filed their *Application for Entry of an Order Authorizing the Employment and Retention of Munsch Hardt Kopf & Harr, P.C. as Counsel, Effective as of August 5, 2024* (the “Retention Application”), which included the Declaration of John D. Cornwell in support of the Retention Application [Docket No. 49-4] and the engagement letter and supplement to the engagement letter between the Debtors and Munsch Hardt, dated May 30, 2023 and April 4, 2024, respectively [Docket No. 49-4] (collectively, the “Engagement Letter”).

15. On September 12, 2024, the Court entered the Order *Authorizing the Employment and Retention of Munsch Hardt Kopf & Harr, P.C. as Counsel, Effective as of August 5, 2024* [Docket No. 97] (the “Retention Order”).

16. The terms and conditions of Munsch Hardt’s employment and compensation are set forth in the Retention Application and in the Engagement Letter, as modified by the Retention Order. Munsch Hardt has no agreement of any kind, express or implied, to divide with any other person or entity any portion of the compensation sought or to be received by it in these Chapter 11 Cases.

17. As disclosed in the Retention Application, during the 90-day period prior to the Petition Date, Munsch Hardt received payments in the aggregate amount of \$725,000.00 in fees for services performed and expenses incurred, including preparation for the commencement of the Chapter 11 Cases.

18. During the Chapter 11 Cases, Munsch Hardt served monthly fee statements for payment of fees and expenses and received certain payments from the Debtors pursuant to the Interim Compensation Order. Below is a summary of the monthly fee statements showing the fees billed, expenses incurred, and payments received by Munsch Hardt during the Application Period and any unpaid balance as of the date of this Application:

Monthly Fee Statement	Fee Statement Period	100% Fees	80% Fees	100% Expenses	Unpaid Balance
1st	8/5/24 – 8/31/24	\$119,088.50	\$95,270.80	\$365.00	0.00
2nd	9/1/24 – 9/30/24	\$66,494.50	\$53,195.60	\$341.26	0.00
3rd	10/1/24 – 10/31/24	\$108,694.00	\$86,955.20	\$691.00	0.00
4th	11/1/24 – 11/30/24	\$207,786.50	\$166,229.20	\$28.00	0.00
5th	12/1/24 – 12/31/24	\$233,842.50	\$187,074.00	\$1,144.75	0.00
6th	1/1/25 – 1/31/25	\$663,591.50	\$530,873.20	\$40,723.22	0.00
7th	2/1/25 – 2/28/25	\$82,320.50	\$65,856.40	\$819.40	0.00
8th	3/1/25 – 3/31/25	\$45,067.00	\$36,053.60	\$78.08	0.00
9th	4/1/25 – 4/30/25	\$40,810.50	\$32,648.40	\$39.04	0.00
10 th	5/1/25 – 5/31/25	\$43,667.00	\$34,933.60	\$39.04	\$8,733.40

Monthly Fee Statement	Fee Statement Period	100% Fees	80% Fees	100% Expenses	Unpaid Balance
*	6/1/25 – 6/30/25 ³	\$159,036.00	N/A	\$3,905.45	\$162,941.45
Total		\$1,770,398.50	\$1,289,090.00	\$48,174.24	\$171,674.85

19. During the Chapter 11 Cases, Munsch Hardt filed interim fee applications for payment of fees and expenses, and upon the Court’s entry of orders approving those interim fee applications, the Debtors paid Munsch Hardt any unpaid amounts allowed by those orders pursuant to the Interim Compensation Order. On November 27, 2024, Munsch Hardt filed the *First Interim Fee Application of Munsch Hardt Kopf & Harr, P.C., as Counsel for the Debtors and Debtors-in-Possession, for the Interim Fee Period From August 5, 2024 through and including October 31, 2024* [Docket No. 224] (the “First Interim Fee Application”), which included the Monthly Fee Statements for August, September, and October 2024. On December 27, 2024, the Court entered the *Order Allowing Interim Compensation and Reimbursement of Expenses* [Docket No. 271] (“First Interim Fee Order”), allowing interim compensation and reimbursement of expenses in the amount of \$295,674.26 for the period set forth in the First Interim Fee Application. Following the entry of the First Interim Fee Order, the Debtors paid Munsch Hardt \$58,855.40, representing the unpaid balance of the allowed amount.

20. On February 28, 2025, Munsch Hardt filed the *Second Interim Fee Application of Munsch Hardt Kopf & Harr, P.C., as Counsel for the Debtors and Debtors-in-Possession, for the Interim Fee Period From November 1, 2024 through and including January 31, 2025* [Docket No. 360] (the “Second Interim Fee Application”), which included the Monthly Fee Statements for November and December 2024, and January 2025. On March 25, 2025, the Court entered the *Order Allowing Second Interim Compensation and Reimbursement of Expenses* [Docket No. 397]

³ Munsch Hardt elected not to serve a monthly fee statement for this period. Munsch Hardt is requesting fees and expenses incurred during the period August 5, 2024 to June 30, 2025 in this Application. A detailed billing statement for this time period is annexed hereto in **Exhibit E**.

(“Second Interim Fee Order”), allowing interim compensation and reimbursement of expenses in the amount of \$1,105,220.50 for the period set forth in the Second Interim Fee Application. Following the entry of the Second Interim Fee Order, the Debtors paid Munsch Hardt \$221,044.10, representing the unpaid balance of the allowed amount.

21. On May 30, 2025, Munsch Hardt filed the *Third Interim Fee Application of Munsch Hardt Kopf & Harr, P.C., as Counsel for the Debtors and Debtors-in-Possession, for the Interim Fee Period From February 1, 2025 through and including April 30, 2025* [Docket No. 443] (the “Third Interim Fee Application”), which included the Monthly Fee Statements for February, March, and April 2025. On June 30, 2025, the Court entered the *Order Allowing Third Interim Compensation and Reimbursement of Expenses* [Docket No. 510] (“Third Interim Fee Order”), allowing interim compensation and reimbursement of expenses in the amount of \$169,134.52 for the period set forth in the Third Interim Fee Application. Following the entry of the Third Interim Fee Order, the Post-Effective Date Debtors paid Munsch Hardt \$34,972.64, representing the unpaid balance of the allowed amount.

22. Munsch Hardt is submitting this Application for allowance on a final basis of compensation for services rendered in the total amount of \$1,770,398.50 and reimbursement of actual and necessary expenses in the total amount of \$48,174.24, for a total of \$1,818,572.74, for the Application Period. As of this Application, the unpaid balance is \$171,674.85 in fees and expenses as reflected on Munsch Hardt’s invoice (included in **Exhibit E**) for the period from May 1, 2025 through June 30, 2025. Munsch Hardt is holding a retainer in the amount of \$221,543.07 (the “Retainer”).

V. CASE STATUS SUMMARY

23. Munsch Hardt is submitting this Application for allowance on a final basis of compensation in these Chapter 11 Cases. The Application Period for this final Application is the

entirety of the Chapter 11 Cases from Petition Date through the Effective Date of the Plan. In general during the Application Period, Munsch Hardt assisted the Debtors with all aspects of the Chapter 11 Cases including operating in bankruptcy and formulating the Debtors' exit from chapter 11. These efforts culminated in the confirmation and Effective Date of a chapter 11 plan of liquidation in approximately 11 months.

24. Along with obtaining confirmation of the Plan, Munsch Hardt helped the Debtor with a number of other issues and matters during the Chapter 11 Cases, including, but not limited to, (i) preparing for the first day hearing; (ii) preparing for the initial debtor interview and Section 341 meeting of creditors; (iii) assisting with the preparation of the schedules of assets and liabilities and statements of financial affairs; (iv) handling inquiries from creditors, the U.S. Trustee, and other parties in interest; (v) advising on use of cash collateral; (vi) handling and advising on multiple hearings, including the contested hearing on the initial plan; (vii) assisting with the sale process for multiple assets, including bid procedures; (viii) obtaining Court approval of the solicitation procedures and schedule for confirmation and related dates and deadlines; (ix) preparation, attendance, and facilitation of five auctions of Debtors' properties and related closings of same; (x) negotiating with certain constituencies regarding the Plan and the Confirmation Order; and (xi) advising generally on issues related to operating in chapter 11. Additional information relating to more specific work performed during the Application Period is provided in this Application and is set forth in the narratives in Munsch Hardt's detailed billing statements, attached as **Exhibit E** to this Application.

VI. SUMMARY OF SERVICES PERFORMED BY CATEGORY

25. The professional services performed by Munsch Hardt on behalf of the Debtors during the Application Period are summarized by task category below.

Task 01 – Case Administration/Noticing.

Application Period Total Hours: 72.60; Fees: \$21,313.50

26. During the Application Period, Munsch Hardt consulted and coordinated with Stretto, Inc. (“Stretto”), the Debtors’ claims and noticing agent in these Chapter 11 Cases, regarding notice list considerations and service of various pleadings in these Chapter 11 Cases. Munsch Hardt filed updated master service lists and creditor lists as required and as necessary based on information developed during the Chapter 11 Cases. Further, Munsch Hardt attended to coordination of dates and deadlines associated with the various hearings, sales and solicitation procedures.

Task 02 – General Bankruptcy Advice/Opinions.

Application Period Total Hours: 123.40; Fees \$65,016.00.

27. Munsch Hardt consulted and coordinated with the Debtors and the Debtors’ other professionals regarding general case and bankruptcy-related strategy. This task code also includes Munsch Hardt’s fees for general matters within the scope of its representation of the Debtors and not allocated to specific tasks including negotiating and preparing settlement papers related to an insurance claim on the TAF Pinnacle Park property.

Task 03 – Schedules, SOFA, IDI, and 341 Meeting.

Application Period Total Hours: 105.20; Fees \$51,684.50.

28. Munsch Hardt coordinated with Debtors regarding the initial debtor interview, including preparation of the Debtors’ representative and provision of the information to the U.S. Trustee. Further, Munsch Hardt coordinated with the Debtors and Debtors’ management and other professionals regarding the preparation and filing of the schedules of assets and liabilities

(“Schedules”) and statements of financial affairs (“SOFAs”) for the Debtors in these chapter 11 Cases, and amendments thereto.

Task 04 – First and Second Day Matters/Hearings.

Application Period Total Hours: 76.20; Fees \$42,407.00.

29. Munsch Hardt prepared and filed various “first day” motions to authorize the Debtors to satisfy their obligations with respect to utility services, to extend time to file the Schedules and SOFAs, and to continue operating their cash management system. Munsch Hardt communicated extensively with the Debtors, U.S. Trustee, and counsel for BANA regarding the first-day motions, and the Court approved each of the first-day motions following presentation by Munsch Hardt.

Task 05 – Cash Collateral and Postpetition Financing.

Application Period Total Hours: 52.00; Fees: \$31,127.00.

30. Munsch Hardt communicated with BANA’s counsel regarding approval of the cash collateral budget and the form of certain filings relating thereto. Munsch Hardt communicated with Getzler Henrich & Associates LLC (“GHA”) and BANA’s counsel regarding tracking use of cash collateral and extensions of cash collateral use. Further, Munsch Hardt worked with GHA and BANA’s counsel regarding wind-down budgeting and fee estimation.

Task 06 – Stay Matters.

Application Period Total Hours: 133.60; Fees: \$72,353.50.

31. Munsch Hardt conferred with counsel for BANA regarding the *Motion of Bank of America, N.A. for Entry of an Order Pursuant to 11 U.S.C. § 362(d) Granting Relief from the Automatic Stay or, in the Alternative, Dismissing the Applicable Debtors’ Cases Pursuant to 11 U.S.C. § 1112(b) and Memorandum of Law in Support Thereof* [Dkt. No. 140] (“BANA Stay”).

Motion”), reviewed and analyzed the BANA Stay Motion, and attended to preliminary issues required for a response to the BANA Stay Motion, including coordination with the Debtors’ management and other professionals. Further, Munsch Hardt communicated with other Debtor advisors and counsel for BANA regarding revised cash collateral budget and order necessary to temporarily resolve the BANA Stay Motion. In addition, Munsch Hardt conferred with BANA’s counsel regarding hearing dates and continuations of the BANA Stay Motion to align with the Debtors’ chapter 11 plan processes.

Task 07 – Employment and Fee Applications.

Application Period Total Hours: 203.70; Fees: \$86,497.00.

32. Munsch Hardt prepared retention materials and fee statements and applications as required by the Bankruptcy Code, Bankruptcy Rules, Interim Compensation Order, and U.S. Trustee Guidelines. Munsch Hardt also attended to correspondence and inquiries regarding same.

Task 08 – Asset Disposition.

Application Period Total Hours: 804.90; Fees: \$397,991.00.

33. Munsch Hardt coordinated and developed strategies with the Debtors’ management, BANA, retained brokers, and other professionals regarding the sale of the Debtors’ properties including DTC, Pinnacle Park Land, Bowie, Mark Center, and Windward Oaks, and the sale of Westway equity. Munsch Hardt reviewed and revised draft broker agreements, broker retention applications, and purchase and sale agreements. For each sale process, Munsch Hardt communicated and coordinated with counsel for BANA. Munsch Hardt coordinated notices for, and conducted, the auction for each of the Debtors’ properties. Moreover Munsch Hardt analyzed unexpired lease and executory contract issues related to disposition of the Debtors’ properties and

prepared and filed the appropriate notices related to same. Further, Munsch Hardt drafted, reviewed, revised, and coordinated execution of closing documents for each sale transaction.

Task 09 – Leases and Contracts.

Application Period Total Hours: 3.00; Fees: \$1,500.00.

34. Munsch Hardt reviewed certain of the Debtors' leases and analyzed potential cure issues regarding same. Other matters related to leases and contracts were billed under the asset disposition and plan task codes.

Task 10 – Bar Date and Claims Administration.

Application Period Total Hours: 7.80; Fees: \$3,726.50.

35. Munsch Hardt consulted with the Debtors regarding outstanding claims. Munsch Hardt prepared and coordinated filing of a motion setting a bar date in these Chapter 11 Cases and coordinated the service of same. Moreover, Munsch Hardt communicated and coordinated with Stretto regarding the filed proofs of claim.

Task 11 – Plan and Disclosure Statement.

Application Period Total Hours: 1,733.20; Fees: \$977,675.50.

36. The Debtors' chapter 11 plan processes occurred in two parts. Initially, Munsch Hardt consulted with the Debtors' management and other professionals regarding potential strategies, options, and issues related to a plan of reorganization, assisted with plan modeling and analysis, prepared a plan term sheet, and, ultimately, drafted and prepared the initial plan (the "Initial Plan") [Docket No. 227, as amended and supplemented]. Munsch Hardt sought and obtained conditional approval of the disclosure statement and approval of solicitation procedures for the plan. Munsch Hardt also conducted research and legal analysis regarding issues related to cramdown standards, plan voting, and other related issues. Munsch Hardt prepared various

supplemental materials to the plan. Munsch Hardt also drafted the *Debtors' Memorandum of Law in Support of Final Approval of the Debtors' Disclosure Statement and Confirmation of the Debtors' Chapter 11 Plan* [Docket. No. 313]. Munsch Hardt prepared for and attended six (6) depositions of witnesses in advance of the joint hearing on confirmation and the BANA Stay Motion (the "Joint Hearing"). Further, among other preparations, Munsch Hardt conferred with its witnesses and other business personnel, reviewed deposition transcripts, prepared demonstrative exhibits, and coordinated with opposing counsel regarding exhibits and trial presentation in preparation for the Joint Hearing. Munsch Hardt attended the Joint Hearing and related status conferences.

37. Following the hearings regarding the Debtors' Initial Plan, Munsch Hardt consulted with the Debtors' management, BANA, and other professionals regarding strategies, options, and issues related to a plan of liquidation, assisted with plan modeling and analysis, and, ultimately, drafted and prepared the Plan. Munsch Hardt sought and obtained conditional approval of the disclosure statement and approval of solicitation procedures for the Plan. Munsch Hardt also conducted research and legal analysis regarding Plan voting and other related issues. Munsch Hardt further coordinated with BANA's counsel regarding the voting amount for BANA's claims. Munsch Hardt prepared additional filings and notice materials required in connection with Plan confirmation. Ultimately, Munsch Hardt prepared for and obtained confirmation of the Plan on behalf of the Debtors, with consent from BANA. Lastly, Munsch Hardt coordinated with various advisors to meet the target Effective Date of June 30, 2025 for the Plan.

Task 12 – Tax Matters/Taxing Authorities.

Application Period Total Hours: 2.20; Fees: \$1,648.00.

38. Munsch Hardt provided analysis of tax issues pertaining to the Debtors' estates. Munsch Hardt also assisted with an ongoing audit of OME Holdings.

Task 13 – Business Operations.

Application Period Total Hours: 10.40; Fees: \$5,374.50.

39. Munsch Hardt corresponded with Debtors, Debtors' management and the representatives of the professional property manager regarding issues related to the Debtors' properties. Munsch Hardt also coordinated with the Debtors on other operational matters related to insurance recoveries and tenant renewal discussions.

Task 14 – Reporting/MORs.

Application Period Total Hours: 30.30; Fees: \$12,084.50.

40. During the entirety of the Application Period, Munsch Hardt coordinated with the Debtors' management and GHA regarding preparation and review of the monthly operating reports and provided analysis of issues related thereto.

VII. REIMBURSEMENT REQUEST FOR EXPENSES INCURRED

41. Munsch Hardt requests reimbursement of its actual and necessary out-of-pocket expenses in the aggregate amount of \$48,174.24, which were incurred during the Application Period in connection with rendering services to the Debtors. A summary of all expenses is attached as **Exhibit C**, and the detail supporting each expense category is included in Munsch Hardt's detailed billing statements in **Exhibit E**.

VIII. REIMBURSEMENT REQUEST FOR FEES INCURRED

42. Munsch Hardt requests allowance of compensation for fees in the total amount of \$1,770,398.50 for 3,358.5 hours of professional services rendered for the Debtors during the Application Period.

43. A description of the time spent and services rendered by each professional in each of the major areas of these Chapter 11 Cases is detailed in this Application. To aid the Court's evaluation of the reasonableness of the fees, a summary schedule setting forth the number of hours devoted by Munsch Hardt's professionals, the applicable billing rates, respective year of licensing, and fees sought is attached as **Exhibit A**. Additionally, a summary of fees sought for each task category is included on **Exhibit B**.

44. Munsch Hardt worked to restrict the number of lawyers involved in these Chapter 11 Cases to (a) maximize familiarity with the subject matter and avoid waste or duplicate efforts; (b) employ special expertise in a given field of law when necessary to do the best job possible with the least amount of time billed to the estates; and (c) assign the performance of all tasks to the least-senior attorney or paraprofessional capable of performing it consistent with sound legal representation and supervision.

45. Munsch Hardt also took measures to utilize professionals whose expertise is of the requisite level to perform the services. Due to the nature of the Chapter 11 Cases and the complex legal issues presented, coupled with the speed in which these issues needed to be addressed, a sizeable portion of senior attorney time was expended to efficiently and effectively represent the Debtors. It was also occasionally necessary for more than one attorney to participate in a given task or project to adequately and completely represent the Debtors. Dual participation does not equate to duplication of effort, but rather promotes efficiency and prevents unnecessary duplication of effort in the future. Conferences, emails, and the preparation of memoranda were used as

necessary to promote efficiency. Meetings and telephone conferences occasionally involved multiple separate subject matters and issues which were being handled by different attorneys.

IX. BASIS FOR RELIEF REQUESTED

46. The Application meets the standards and requirements under the Bankruptcy Code, Bankruptcy Rule 2016, and applicable case law. Section 330 of the Bankruptcy Code authorizes the Court to award Munsch Hardt “reasonable compensation for actual, necessary services rendered” and reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1).

47. In assessing the reasonableness of attorneys’ fees and expenses under section 330(a)(1) of the Bankruptcy Code, courts also apply the twelve factors from *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974). *See In re First Colonial Corp. of Am.*, 544 F.2d 1291, 1298–99 (5th Cir. 1977), *cert. denied*, 431 U.S. 904 (1977) (quoting and applying the *Johnson* factors to the determination of awards of attorneys’ fees in bankruptcy cases). The *Johnson* opinion recognized that factors other than those referenced in the Bankruptcy Code may be considered in determining the reasonableness of the amount of attorneys’ fees to be awarded in a bankruptcy proceeding. *See Johnson*, 488 F.2d at 717–20. Specifically, the *Johnson* factors are: (1) time and labor required; (2) novelty and difficulty of the questions; (3) skill requisite to perform the legal service properly; (4) preclusion of other employment by the attorney due to acceptance of the case; (5) customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or other circumstances; (8) amount involved and the results obtained; (9) experience, reputation, and ability of the attorneys; (10) “undesirability” of the case; (11) nature and length of the professional relationship with the client; and (12) awards in similar cases. *Johnson*, 488 F.2d at 717–19.

48. Munsch Hardt submits that its request for compensation is reasonable and proper, and that such factors and standards justify the allowance in full of the requested fees and expenses

incurred in its representation of the Debtors during the Application Period. Further, the time Munsch Hardt spent on services rendered and the rates charged for such services were reasonable and necessary; as supported by the *Johnson* factors—certain of which are discussed in turn below.

Time and Labor Required

49. Munsch Hardt provided 3,358.5 hours of professional services during the Application Period, and Munsch Hardt's detailed billing statements, included in **Exhibit E**, list in detail all of the work performed for which compensation is sought. Specifically, the date the services were rendered, the individual performing such services, a description of the services, and the time expended, are all detailed. Munsch Hardt believes that such detail establishes that its request for compensation is reasonable. All of the services specified were actual and necessary for the Debtors to perform their statutory duties.

Novelty and Difficulty

50. These Chapter 11 Cases involved a number of challenging operational and legal issues, including coordinating a path with the Debtors' secured lender, BANA, to a consensual resolution of these Chapter 11 Cases following a contested Initial Plan process.

Skill Required to Perform the Legal Service Properly

51. Bankruptcy is a specialized area of federal practice, requiring knowledge of the Bankruptcy Code and other related state and federal statutes and precedent. These cases also required real estate and litigation/trial expertise and support. Munsch Hardt believes it demonstrated the skill necessary to maximize value for the Debtors' estates in a challenging environment.

Customary Fee

52. The hourly rates for each Munsch Hardt professional are summarized in **Exhibit A** filed in support of this Application. These rates are commensurate with rates charged by attorneys with similar qualifications and experience at comparable law firms, and with rates charged to other Munsch Hardt clients. The hourly rates of Munsch Hardt compare favorably with average costs for similar legal services. Munsch Hardt submits that the fees being sought herein are the same as (or lower than) they would have been in a non-bankruptcy matter of similar size and complexity.

Whether the Fee is Fixed or Contingent

53. Munsch Hardt's fee is neither fixed nor contingent other than the contingency of Court approval and available assets to pay professionals. It is based upon the actual total number of hours worked plus the actual costs incurred.

Time Limitations Imposed by the Client or Other Circumstances

54. Because of the limited cash collateral runway and the pending BANA Stay Motion, as well as certain other emergency or expedited matters, Munsch Hardt provided services on complicated issues on an expedited basis. Under such time limitations, Munsch Hardt provided services competently, efficiently and without duplication of effort thereby avoiding the expenses of delay and a protracted bankruptcy.

Amount Involved and Results Obtained

55. Munsch Hardt's actions in these Chapter 11 Cases assisted the Debtors and provided value to the process. The detailed billing statements in **Exhibit E** and the summary of work performed by task code in this Application detail Munsch Hardt's work during the Application Period. The detailed billing statements include the dates such services were rendered, the individual performing such services, a description of the services, and the time expended.

Munsch Hardt believes that such information, as well as the information provided in this Application, establishes that its requested compensation is reasonable.

56. As a result of Munsch Hardt's efforts in these Chapter 11 Cases, the Debtors achieved a number of objectives vital to the Chapter 11 Cases, including selling assets and coordinating confirmation of the Plan.

Experience, Reputation, and Ability of the Attorneys

57. Over many years, Munsch Hardt's attorneys have regularly appeared in significant representations, including bankruptcy cases throughout Texas. The Munsch Hardt attorneys involved in these Chapter 11 Cases bring years of combined experience in bankruptcy law and have substantial experience practicing in this Court and extensive familiarity with applicable Fifth Circuit bankruptcy law and also the relevant rules and procedures, including the Bankruptcy Local Rules and the Complex Case Procedures necessary for this engagement.

Nature and Length of the Professional Relationship with the Client

58. Munsch Hardt's engagement began before the Petition Date. As noted in the Retention Application, Munsch Hardt represented the Debtors in connection with all phases of the Debtors' bankruptcy efforts, including without limitation, the preparation for filing the Chapter 11 Cases.

Awards in Similar Cases

59. Based on Munsch Hardt's experience in this district, Munsch Hardt's fees are in line with fees allowed in proceedings of similar scope for the services rendered and results obtained.

60. In sum, the *Johnson* factors weigh in favor of the reasonableness of the compensation requested by Munsch Hardt in this Application.

X. STATEMENT PURSUANT TO THE U.S. TRUSTEE GUIDELINES

61. Pursuant to paragraph C.5 of Appendix B to the U.S. Trustee Guidelines, Munsch Hardt states as follows:

- a) **Question:** Did Munsch Hardt agree to any variations from, or alternatives to, its standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the Application Period?

Answer: Munsch Hardt waived its customary annual rate increases and thus did not increase the billing rates for attorneys in this case.

- b) **Question:** If the fees sought in this Application as compared to the fees budgeted for the time period covered by this Application are higher by 10% or more, did Munsch Hardt discuss the reasons for the variation with the client?

Answer: Not applicable.

- c) **Question:** Have any of the professionals included in this Application varied their hourly rate based on the geographic location of the bankruptcy case?

Answer: No.

- d) **Question:** Does the Application include time or fees relating to reviewing or revising time records or preparing, reviewing, or revising invoices?

Answer: This Application does not include such time or fees other than in connection with the preparation of monthly fee statements, interim fee applications, and this Application.

- e) **Question:** Does the Application include time or fees for reviewing time records to redact any privileged or other confidential information?

Answer: No.

XI. CONCLUSION

62. Munsch Hardt provided necessary services that were reasonably likely to benefit the estates at the time rendered. Taking into account all relevant factors, Munsch Hardt requests that the Court determine that the nature, extent, and value of these services were appropriate under the circumstances at the time the services were rendered.

63. Accordingly, Munsch Hardt respectfully requests entry of an order, substantially in the form attached hereto, (a) allowing Munsch Hardt compensation and reimbursement of expenses in the total amount of \$1,818,572.74 (b) approving on a final basis the allowance of compensation and reimbursement of expenses, including all previous interim allowances of compensation and reimbursement of expenses, (c) authorizing the Post-Effective Date Debtors to disburse any unpaid amounts allowed following the application of the Retainer in the amount of \$221,543.07, and (d) granting such other and further relief as the Court deems just and proper.

Dated: August 14, 2025

Respectfully submitted,

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ John D. Cornwell

John D. Cornwell

Texas Bar No. 24050450

Brenda L. Funk

Texas Bar No. 24012664

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Counsel for the Post-Effective Date Debtors

STATEMENT OF CERTIFYING PROFESSIONAL

I hereby certify that I have read the foregoing Application and to the best of my knowledge, information and belief, formed after reasonable inquiry, the compensation and expense reimbursement sought is billed at rates, in accordance with practices, no less favorable than those customarily employed by Munsch Hardt in similar matters and generally accepted by Munsch Hardt's clients.

/s/ John D. Cornwell

John D. Cornwell

CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2025, a true and correct copy of the above and foregoing document was served by electronically filing it with the Court using the Court's CM/ECF system.

/s/ John D. Cornwell

John D. Cornwell

EXHIBIT A**Summary of Timekeepers**

Timekeeper	1st		2nd		3rd		May		June		TOTAL	
	Hours	Fees	Hours	Fees	Hours	Fees	Hours	Fees	Hours	Fees	Hours	Fees
John Cornwell	81.90	56,511.00	318.00	219,420.00	38.70	26,703.00	9.90	6,831.00	36.20	24,978.00	484.70	334,443.00
Brenda Funk	169.10	101,460.00	333.50	200,100.00	75.90	45,540.00	2.50	29,150.00	63.00	37,800.00	644.00	414,050.00
Julian Vasek	8.60	4,859.00	151.20	85,428.00	24.40	13,786.00					184.20	104,073.00
Julian Vasek NC			0.50	-							0.50	-
Justin Ratley	0.60	360.00									0.60	360.00
Adrienne Wall	0.40	210.00									0.40	210.00
Zach Schneider	6.00	2,850.00	35.70	19,635.00	6.20	3,410.00	2.10	1,500.00	42.80	23,540.00	92.80	50,935.00
Alex Perez	200.60	100,300.00	425.40	212,700.00	134.90	67,450.00	58.30	1,155.00	121.30	60,650.00	940.50	442,255.00
Alex Perez NC			6.80	-							6.80	-
Beverly Bass	20.80	7,904.00	12.20	4,636.00							33.00	12,540.00
Valentine	92.20	19,823.00	244.10	52,481.50	52.60	11,309.00	23.40	5,031.00	53.60	11,524.00	465.90	100,168.50
Valentine NC			1.20	-			0.10	-			1.30	-
Chris Speer			1.50	1,260.00							1.50	1,260.00
Jamil Alibhai			3.30	2,277.00							3.30	2,277.00
Jamil Alibhai			232.90	183,991.00							232.90	183,991.00
Julie Christensen			12.60	5,418.00							12.60	5,418.00
Julie Christensen			242.40	116,352.00							242.40	116,352.00
Lindsay Duff			3.80	1,330.00							3.80	1,330.00
Brittani Miller			5.10	-							5.10	-
Meg Wingert			0.60	192.00					0.80	256.00	1.40	448.00
Georgie Tomalty									0.80	288.00	0.80	288.00
	580.20	294,277.00	2,030.80	1,105,220.50	332.70	168,198.00	96.30	43,667.00	318.50	159,036.00	3,358.50	1,770,398.50

EXHIBIT B**Summary by Task Category**

Task #	Task Category	1st Interim Hours	1st Interim Fees	2nd Interim Hours	2nd Interim Fees	3rd Interim hours	3rd Interim Fees	May hours	May Fees	June Hours	June Fees		Total Hours	Total Fees
1	Case	53.70	\$ 16,350.00	14.60	\$ 3,690.00	2.60	\$ 730.00	0.30	\$ 100.00	1.40	\$ 443.50		72.60	\$ 21,313.50
2	General Bankruptcy Advice/Opinions	60.30	\$ 34,994.50	36.00	\$ 17,077.00	19.60	\$ 9,536.50	5.90	\$ 2,807.50	1.60	\$ 600.50		123.40	\$ 65,016.00
3	Schedules, SOFA, IDI and 341 Meeting	92.50	\$ 46,560.00	12.70	\$ 5,124.50	0.00	\$ -	0.00	\$ -	0.00	\$ -		105.20	\$ 51,684.50
4	First and Second Day Matters/Hearings	76.20	\$ 42,407.00	0.00	\$ -	0.00	\$ -	0.00	\$ -	0.00	\$ -		76.20	\$ 42,407.00
5	Cash Collateral and Postpetition Financing	46.70	\$ 28,099.50	0.10	\$ 69.00	4.80	\$ 2,718.50	0.00	\$ -	0.40	\$ 240.00		52.00	\$ 31,127.00
6	Stay Matters	6.10	\$ 3,666.00	127.50	\$ 68,687.50	0.00	\$ -	0.00	\$ -	0.00	\$ -		133.60	\$ 72,353.50
7	Employment and Fee Applications	86.40	\$ 38,800.50	42.80	\$ 20,209.50	47.20	\$ 17,656.00	19.70	\$ 7,351.50	7.60	\$ 2,479.50		203.70	\$ 86,497.00
8	Asset Disposition	83.80	\$ 44,411.00	269.70	\$ 129,649.50	129.00	\$ 65,427.00	60.50	\$ 28,664.00	261.90	\$ 129,839.50		804.90	\$ 397,991.00
9	Leases and Contracts	0.00	\$ -	2.70	\$ 1,350.00	0.30	\$ 150.00	0.00	\$ -	0.00	\$ -		3.00	\$ 1,500.00
10	Bar Date and Claims Administration	3.90	\$ 1,923.00	3.60	\$ 1,653.50	0.30	\$ 150.00	0.00	\$ -	0.00	\$ -		7.80	\$ 3,726.50
11	Plan and Disclosure Statement	45.90	\$ 25,796.50	1515.80	\$ 854,814.00	120.60	\$ 68,523.00	7.00	\$ 3,674.00	43.90	\$ 24,868.00		1733.20	\$ 977,675.50
12	Tax Matters/Taxing Authorities	0.20	\$ 138.00	1.80	\$ 1,410.00	0.20	\$ 100.00	0.00	\$ -	0.00	\$ -		2.20	\$ 1,648.00
13	Business Operations	8.80	\$ 4,474.50	0.50	\$ 300.00	1.10	\$ 600.00	0.00	\$ -	0.00	\$ -		10.40	\$ 5,374.50
14	Reporting/MORs	15.70	\$ 6,656.50	3.00	\$ 1,186.00	7.00	\$ 2,607.00	2.90	\$ 1,070.00	1.70	\$ 565.00		30.30	\$ 12,084.50
		580.20	294,277.00	2030.80	1,105,220.50	332.70	168,198.00	96.30	43,667.00	318.50	159,036.00		3358.50	\$1,770,398.50

EXHIBIT C**Summary of Expenses by Category**

	1st	2nd	3rd	May	June	Total
Expense Category	Amount	Amount	Amount	Amount	Amount	
Hearing & Court Transcripts	365.00	2,555.00				2,920.00
Status Certificate	90.00		15.00			105.00
Certificate of Good Standing	217.26					217.26
Filing Fees	34.00					34.00
Copies	691.00					691.00
Westlaw		-				-
Parking/Cab/Mileage		554.90	40.00			594.90
Court Reporter		541.00				541.00
Travel Expenses		11,284.86				11,284.86
Fedex		239.91			430.13	670.04
Reporting Services		26,720.30	264.00		2,543.40	29,527.70
Courier			500.40			500.40
Data Hosting			117.12	39.04	39.04	195.20
Certified Copies					892.88	892.88
	1,397.26	41,895.97	936.52	39.04	3,905.45	48,174.24

EXHIBIT D**Customary and Comparable Compensation Disclosures**

Category of Timekeeper	Total Hours	Total Fees	Blended Hourly Rate¹	
			Billed in this Application	Billed by Office for Preceding Year (Excluding Bankruptcy)
Shareholder	1,824.50	\$1,153,404.00	\$632.18	\$520.12
Senior Attorney	767.70	\$380,450.00	\$495.57	\$356.66
Associate	297.70	\$135,928.00	\$456.59	\$340.05
Paralegal	468.60	\$100,616.50	\$214.72	\$217.37
All Timekeepers Aggregated	3,358.50	\$1,770,398.50	\$527.14	\$439.54

¹ Consistent with the U.S. Trustee Guidelines, the blended hourly rates set forth in this chart are calculated by dividing the dollar value of hours billed by the number of hours billed for the relevant timekeepers during the Application Period. The data for the “preceding year” is based on information from the Applicant’s last completed calendar year ending December 31, 2023.

Exhibit E
Monthly Statements



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
Fax 214.855.7584
munsch.com

The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: September 12, 2024
Invoice Number: 10537901
Matter Number: 021990.00002

*For Professional Services through **August 31, 2024***

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	119,088.50
Total Costs	\$	<u>365.00</u>
Total Balance Due	\$	119,453.50

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10537901

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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September 12, 2024

Fee Detail**Task Code:** 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/05/24	ARP	Phone conference with US Trustee regarding complex case filing (.5); correspond with T. Laws regarding complex case filing (.1); and correspond with S. McGuire of Stretto regarding service of first day pleading and notice of commencement (.7).	1.30	650.00
08/07/24	ARP	Correspond with Stretto regarding service of first day pleadings, form notice of commencement, and related issues (.5).	0.50	250.00
08/07/24	BLF	Review and provide comments on notice of commencement.	0.20	120.00
08/12/24	BLF	Review status of service and notice of case and correspondence with H. Valentine and A. Perez regarding same (.3); review correspondence related to taxing authority and correspondence with H. Valentine regarding names on creditor matrix (.1).	0.40	240.00
08/12/24	HJV	Review pleadings for dates and deadlines (.7). Attention to calendaring dates and deadlines (.3). Confer with B. Funk regarding preparing statements and schedules (.1). Confer with A. Perez regarding employment retention application and interim compensation motion (.1). Meeting with Genzler Henrich to discuss status and go forward strategy (.8).	2.10	451.50
08/13/24	ARP	Review proposed form of publication of notice of commencement (.2); correspond with S. McGuire of Stretto regarding notice and service issues (.4).	0.60	300.00
08/13/24	HJV	Team meeting regarding next steps and upcoming deadlines and strategy (1.20). Review and revise employment application, declaration, and interim compensation motion (1.50). Work on updating interested parties list for employment application (2.60).	5.30	1,139.50
08/14/24	BLF	Consider creditor lists and noticing requirements and research regarding same (.9); multiple conferences with H. Valentine and A. Perez regarding same (.3).	1.20	720.00
08/14/24	ARP	Work sessions with B. Funk and H. Valentine regarding creditor matrix and service list (.5).	0.50	250.00
08/14/24	HJV	Work on interested party list for employment application declaration (.5). Coordinate with C. Thomas regarding certificates of good standing (.3). Review master service list and creditor matrix for accuracy (.3); research and emails to team regarding same (1.4).	2.50	537.50
08/15/24	ARP	Work sessions with H. Valentine and B. Funk regarding gathering and processing creditor lists and information for final creditor matrix (4.5); review and approve final master service list (.2); phone conferences and follow up correspondence with J. Baumgartner and R. Olivero regarding creditor lists and information (1.0); attention to correspondence with S. McGuire regarding issues related to	7.60	3,800.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10537901

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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September 12, 2024

		processes for finalizing the master service list and matrix (1.5); and review and approve final creditor matrix (.4).		
08/15/24	BLF	Consider and attend to correspondence regarding creditor matrix. (.6); office conferences with H. Valentine and A. Perez regarding same (.5); monitor correspondence regarding updates to creditor matrix and filing (.3)	1.40	840.00
08/15/24	HJV	Review master service list received from Stretto; research to determine what additional notice parties are needed (.9). Confer with A. Perez and B. Funk regarding the master service list and matrix and AP lists still needed from Getzler (.6). Continue work on master service list and creditor matrix (10.5).	10.30	2,214.50
08/15/24	JDC	Coordination with team regarding compilation of master service list and related service issues.	0.30	207.00
08/16/24	HJV	Work on connections list for retention application (2.4). Emails with E. Pinales, A. Perez and B. Funk regarding same (.2).	2.60	559.00
08/19/24	HJV	Confer with A. Perez and B. Funk regarding schedules (.1). Revise schedules to retention application (3.6).	5.60	1,204.00
08/21/24	HJV	Prepare Hilco reports for B. Funk's review.	0.20	43.00
08/26/24	BLF	Review and coordinate filing of master service list.	0.10	60.00
08/26/24	HJV	Attention to calendaring objection deadlines (.2). Revise retention and interim compensation orders per UST comments (.5). Email to B. Funk regarding same (.1).	0.80	172.00
08/27/24	ARP	Correspond with B. Funk confirming service of notice of commencement on insurance companies.	0.20	100.00
08/29/24	HJV	Continue research and analysis of Dallas and Denton real property records for debtors' foreclosed properties (1.1). Email to team with results (.2). Conference with B. Funk regarding real property records for Dallas and Denton counties (.3). Additional research and analysis of same (.6).	2.20	473.00
08/30/24	HJV	Research Denton county clerk records regarding TAF Lakeside and email to A Perez regarding same.	0.20	43.00
Total for 01			46.10	14,374.00

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/06/24	ARP	Phone conference with B. Funk, Getzler Henrich team, and debtors' representatives regarding post-filing issues (.3); correspond with L. Anderson of Hines team regarding post-petition operations and related issues (.7); case strategy work sessions with B. Funk and J. Cornwell regarding cash collateral motion and issues, first day declaration, and hearing preparations (1.0).	2.00	1,000.00
08/06/24	JDC	Communications with team regarding DTC sale status and strategy (.2).	0.20	138.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10537901

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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September 12, 2024

08/09/24	JDC	Coordination with B. Funk regarding DTC sale strategy, cash flow projection status, Pinnacle Park Land contract status, and general next steps (.3). Telephone conference with John Baumgartner and B. Funk regarding capital expenditures issues, cash flow projections and related issues (.3).	0.60	414.00
08/09/24	BLF	Conferences with J. Cornwell and J. Baumgartner regarding general case status and open matters.	0.50	300.00
08/10/24	BAB	Research regarding Bankruptcy Rule 327 and disinterestedness for pre-petition non-bankruptcy services.	1.00	380.00
08/12/24	BLF	Prepare for and attend general update and strategy call with debtors' professionals.	1.00	600.00
08/12/24	ARP	Phone conference with J. Baumgartner, R. Olivero, and B. Kim of Getzler Henrich and J. Cornwell and B. Funk regarding case strategy and coordination of next steps in bankruptcy case.	0.80	400.00
08/12/24	JDC	Telephone conference with Getzler and MHKH teams regarding strategy.	0.80	552.00
08/13/24	BLF	Review status of case and attend WIP meeting with team (1.5); follow-up conference with J. Cornwell regarding same (.2).	1.70	1,020.00
08/13/24	JDC	Coordination with B. Funk in advance of client call (.1). Conference with client team regarding various updates, sale process considerations, and general case strategy (1.0). Conference with B. Funk to coordinate call with Mayer Brown (.1). Conference with B. Funk regarding general case strategy, including work-in-progress relating to sale process motions, retention applications, and other filings (.2).	1.40	966.00
08/13/24	ARP	Phone conference with J. Cornwell, B. Funk, J. Baumgartner, R. Olivero, and client representatives regarding case strategy and next steps regarding property sales and related issues (1.1); case strategy work sessions with B. Funk and H. Valentine regarding pleading preparation, notice issues, and additional post-first day hearing follow up issues (2.2).	3.30	1,650.00
08/14/24	BLF	Attend general advisors meeting with Getzler team and J. Cornwell (.5); correspondence and research regarding liabilities following foreclosure (.6).	1.10	660.00
08/14/24	JDC	Preparation of detailed update email to client team regarding BANA discussions (.3). Conference with B. Funk and Getzler team to discuss TI/capital needs, budgeting, BANA discussions, and related strategy (.5). Communications with John Satter of Hilco coordinating conference and potential evidentiary valuation needs (.1).	0.90	621.00
08/15/24	JDC	Conference with B. Funk regarding general case status and strategy.	0.10	69.00
08/19/24	BLF	Conference with J. Cornwell on general case strategy (.3); correspondence and research related to tax liability matter (.7).	1.00	600.00
08/19/24	BLF	Conference with potential valuation expert.	0.30	180.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10537901

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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September 12, 2024

08/19/24	JDC	Conference with John Satter (Hilco), John Baumgartner, and B. Funk regarding preparation for potential valuation expert testimony (.3). Follow-up email communications with John Satter (.2). Telephone conference with John Baumgartner regarding Hilco valuation strategy and expert selection considerations (.2).	0.70	483.00
08/20/24	HJV	Finalize and file transcript request.	0.20	43.00
08/21/24	JDC	Coordination with B. Funk, client team, and John Ginley regarding update call scheduling and BANA discussion summary.	0.20	138.00
08/22/24	BLF	Prepare for and attend conference with J. Cornwell and client team (1.2); review correspondence regarding coordination of site visits (.2); review and respond to correspondence with J. Ratley regarding insurance matter (.1).	1.50	900.00
08/22/24	JDC	Preparation for client call and related strategy discussions with B. Funk (.3). Conference with client and advisor team regarding updates, sale strategies, cash collateral usage, and other items (.9). Attention to insurance settlement issues with J. Ratley and B. Funk (.1).	1.30	897.00
08/26/24	JDC	Communication with John Satter of Hilco to discuss expert retention and declaration drafting examples (.2); analysis of exemplar declaration from Satter (.2).	0.40	276.00
08/28/24	JDC	Conference with B. Funk regarding post-foreclosure deed release and other potential filing issues, specifically relating to Pinnacle Park (.3); analysis of real property records from H. Valentine regarding same (.2).	0.50	345.00
08/29/24	ARP	Correspond with M. Pena and D. Macias regarding creditor inquiry.	0.20	100.00
08/30/24	ARP	Draft correspondence responding to creditor inquiry (.1); and strategy work discussion with J. Cornwell, B. Funk, and J. Baumgartner regarding outstanding tasks and case issues (.5).	0.60	300.00
08/30/24	JDC	Conference with B. Funk, A. Perez (in part), and John Baumgartner (in part) to discuss sale procedures status, schedules/statements progress, and general strategy.	0.90	621.00
08/30/24	BLF	Prepare for and attend office conference with A. Perez, J. Cornwell and J. Baumgartner (in part) regarding status of case matters.	0.90	540.00
Total for 02			24.10	14,193.00

Task Code: 03 Schedules, SOFA, IDI and 341 Meeting

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/12/24	BLF	Review information related to professional rates and correspondence with Getzler team regarding preparation of schedules and statements.	0.20	120.00
08/13/24	BLF	Coordinate attendance for 341 meeting and correspondence regarding initial debtor reports.	0.20	120.00

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08/14/24	BLF	Conference with Getzler team regarding IDRs (.6); order, review and transmit corporate documents for use in IDR process (.4).	1.00	600.00
08/26/24	BLF	Correspondence with GH team and A. Perez regarding schedules and statements (.1); conference with team regarding same (.5); follow-up correspondence regarding tasks for schedules and statements (.1).	0.70	420.00
08/26/24	ARP	Phone conference with B. Funk, J. Baumgartner, R. Olivero, and B. Kim regarding status and issues related to initial debtor reports, schedules, and statements of financial affairs.	0.50	250.00
08/27/24	HJV	Confer with A. Perez regarding schedules and statements (.2). Gather client documents and information to assist Getzler Henrich and Stretto in preparing the schedules and statements (1.5).	1.70	365.50
08/27/24	ARP	Phone conferences with R. Olivero, J. Baumgartner, and B. Kim regarding issues related to preparation of schedules and statements of financial affairs (1.0); work sessions with H. Valentine regarding coordination of data and information for provision to Getzler team (.4); compile and review information for schedules and statements (3.7); and draft correspondence to B. Funk regarding information needed for statements of financial affairs (.2).	5.30	2,650.00
08/28/24	HJV	Confer with A. Perez regarding schedules (.3). Analysis of contracts to determine applicable to schedule G (.5). Research and analysis of Dallas and Denton county real property records and appraisal district records on foreclosed properties (1.4).	2.20	473.00
08/28/24	BLF	Office conference with H. Valentine regarding foreclosure documentation (.1); review materials related to foreclosures and research same (.9); conference with B. Bass regarding research (.2).	1.20	720.00
08/28/24	ARP	Phone conferences with J. Baumgartner, R. Olivero, B. Kim, M. Pena, and D. Macias regarding data and information for schedules and statements of financial affairs (2.0); phone conference with H. Valentine regarding data and information for Schedules G (.3); compile and review data and information for schedules G (1.5); and draft correspondence to M. Pena and D. Macias regarding data and information for Schedules G (.2).	4.00	2,000.00
08/29/24	JDC	Conference with B. Funk regarding foreclosed property records and analysis of same from H. Valentine.	0.40	276.00
08/29/24	ARP	Review foreclosure transfer deeds (.7); multiple correspondences to J. Baumgartner, R. Olivero, and B. Kim regarding data and information for and comments on draft schedules and statements (3.8); and phone conferences with R. Olivero and B. Kim regarding data, information, and comments on draft schedules and statements (.4).	4.90	2,450.00

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08/29/24	BLF	Continue researching issue related to foreclosures and schedules and statements (1.2); office conference with A. Perez regarding status of schedules and statements (.2); correspondence with team regarding results of research (.1).	1.50	900.00
08/30/24	ARP	Review foreclosure transfer deed (.1); multiple correspondences with A. Jimenez, R. Olivero, B. Kim, and S. McGuire regarding information for the schedules and statements (2.0); review and compile additional information for Schedules G (2.5); phone conference with B. Kim regarding responses for statements of financial affairs (.2); and draft global notes to schedules and statements (.5).	5.30	2,650.00
Total for 03			29.10	13,994.50

Task Code: 04 First and Second Day Matters/Hearings

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/05/24	ARP	Prepare final revisions to various first day motions and proposed orders (7.0); correspond with D. Sigal of Mayer Brown regarding comments to first day orders (.2).	7.20	3,600.00
08/05/24	JDC	Coordination with team regarding filing of first day motions and attention to communications with Mr. Laws regarding same (.2). Communications with Mayer Brown team regarding revisions to first-day orders (.2). Analysis of Stretto communications and live claims agent site (.1). Telephone conference with Charles Haddad regarding filings and first-day coordination (.2).	0.70	483.00
08/05/24	BLF	Continue preparation and filing of first day pleadings.	7.60	4,560.00
08/06/24	ARP	Review comments and correspondence from J. Whitworth with US Trustee to first day motions and proposed orders (.7); correspond with J. Whitworth, J. Baumgartner, and R. Olivero regarding US Trustee comments to first day motions and proposed orders (.4); prepare final revisions to first day declaration (2.5); prepare final revisions to cash collateral motion and proposed interim order (.5); review orders jointly administering case, granting complex case treatment; and authorizing employment of Stretto (.3).	4.40	2,200.00
08/06/24	JDC	Various strategy communications with B. Funk regarding cash collateral order status, communications with Mayer Brown team, cash management/check clearing issues, notice status, and first-day hearing preparations (.8). Begin preparation of first-day slide presentation; review of various materials in preparation of same (1.1).	1.90	1,311.00
08/06/24	BLF	Office conference with A. Perez regarding status of motions and declaration.	0.20	120.00
08/07/24	ARP	Work sessions with J. Cornwell and B. Funk regarding first day hearing preparations and US Trustee comments to first day orders (2.0); draft witness and exhibit list for first day hearings (.5); draft agenda for first day hearings (.8); correspond with J. Whitworth regarding US Trustee	5.50	2,750.00

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		comments to first day orders (.2); phone conference with J. Whitworth, R. Travis, and B. Funk regarding comments to first day orders and bank account issues (.3); prepare revisions to cash management interim proposed order (.5); review motions and orders in preparation for first day hearings (1.2).		
08/07/24	JDC	Conference with B. Funk and A. Perez to discuss first-day hearing preparation, cash collateral and plan strategy issues, cash management and schedules considerations, and various other administrative items (.4). Continued preparation of first-day slide presentation and analysis of various client presentation materials in connection with same (2.1). Conference with B. Funk regarding status and first-day hearing strategy (.2). Telephone conference with Charles Haddad regarding hearing appearance and preparation, including potential cross-examination process and instructions (.4). Conference with UST team and B. Funk (partial) to discuss order revisions and first-day hearing (.2). Analysis of B. Funk revisions to slide presentation and conference with same regarding hearing strategy (.3). Preparation of additional revisions to incorporate leasing data from John Baumgartner (.2). Preparation for first-day presentation (1.5).	5.30	3,657.00
08/07/24	BLF	Multiple conferences and correspondence with J. Cornwell, A. Perez and J. Baumgartner regarding open matters for first day hearings (2.3); review and revise first day presentation (2.2); conference with UST's office regarding comments (.5); follow-up with Getzler regarding same (.2); consider, review and revise agenda and W&E list for filing (.3); review and consider open items to prepare for first day hearing (.6).	6.10	3,660.00
08/08/24	ARP	Prepare notice of revised proposed orders for first day hearings (.5); prepare for first day hearings (3.0); attend first day hearings (1.3); correspond with R. Saldana providing notice of revised proposed orders (.1); correspond with J. Whitworth regarding bank account issues (.1); review cash collateral statement filed by Bank of America (.3); and review first day orders post-entry (.4); correspond with L. Anderson of Hines regarding entry of the interim cash management order (.3).	6.00	3,000.00
08/08/24	JDC	Final preparations for first-day hearings, including review of BANA cash collateral statement (3.5). Conference with B. Funk, A. Perez, and J. Baumgartner regarding same (.7). Electronically appear and present at first-day hearings (1.0). Telephone conference with Charles Haddad regarding hearing and go-forward strategy (.3). Coordinate same with MHKH and Getzler team (.2).	5.70	3,933.00
08/08/24	BLF	Office conference with J. Cornwell and A. Perez regarding status of matters for hearing (.1); revise orders to reflect comments of UST's office and prepare notice regarding same (.7); review and revise first day presentation (.6); prepare for first day hearing (2.5); attend first day hearing and follow-up conference with client and team (1.2); attend to follow-up correspondence regarding first day hearing (.4).	5.50	3,300.00

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08/13/24	ARP	Correspond with K. Bartlett responding to request by Lumen Technologies for treatment as a utility provider (.3); review first day orders for compliance and timing issues (.3); and correspond with J. Baumgartner and R. Olivero regarding issues related to utility adequate assurance deposit (.2).	0.80	400.00
08/14/24	ARP	Draft motion for interim compensation procedures and proposed order (3.4); draft correspondence to J. Baumgartner regarding logistics of adequate assurance deposit (.3).	3.70	1,850.00
08/19/24	BLF	Conferences and correspondence related to use of bank accounts under cash management order.	0.70	420.00
08/19/24	ARP	Draft motion for order to establish bar dates (3.6); revise motion for interim compensation procedures (.5).	4.10	2,050.00
08/20/24	BLF	Attend to correspondence regarding use of bank accounts (.1); correspondence regarding next steps with BANA (.1).	0.20	120.00
08/20/24	ARP	Revise motion for entry of bar date (.5); and draft proposed order and forms of notice of bar dates (2.1).	2.60	1,300.00
Total for 04			68.20	38,714.00

Task Code: 05 Cash Collateral and Postpetition Financing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/05/24	JDC	Coordination with B. Funk regarding revisions to interim cash collateral order and related strategy.	0.30	207.00
08/06/24	JDC	Analysis of additional revisions to cash collateral order and transmittal email (.2). Analysis of additional BANA revisions to cash collateral order (.2), and communication with B. Funk regarding response strategy (.2). Telephone conference with (partial) Mayer Brown team to finalize interim cash collateral order draft (.2). Preparation of detailed update email to Charles Haddad regarding filing status and cash collateral negotiations, seeking approval of same (.3). Telephone conference with Charles Haddad regarding same (.2). Final review and approval of draft cash collateral order (.3); coordinate with B. Funk regarding same (.1).	1.70	1,173.00
08/06/24	BLF	Review and revise interim cash collateral order, motion and declaration regarding same (7.6); conferences with J. Cornwell and J. Baumgartner regarding order (.6); correspondence and conference with Mayer Brown regarding cash collateral order and motion (.5).	8.90	5,340.00
08/07/24	BLF	Revise cash collateral order to reflect UST comments (.6) and correspondence with J. Baumgartner and Mayer Brown regarding same (.2).	0.80	480.00
08/12/24	BLF	Correspondence with Getzler team regarding revised budget.	0.10	60.00
08/18/24	BLF	Review and revise proposed cash collateral order and correspondence with team regarding same.	1.30	780.00
08/19/24	BLF	Conferences with J. Cornwell and Getzler team regarding open items on cash collateral order (.4); review and revise order (.2); transmit same to client team for review (.1).	0.70	420.00

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08/19/24	JDC	Analysis of draft proposed final cash collateral order and preparation of revisions to same (.5). Conference with B. Funk regarding cash collateral order transmittal, Hilco valuation call, and cash collateral hearing preparations (.3). Email communication with Charles Haddad and B. Funk regarding draft proposed final cash collateral order review and approval to transmit to BANA (.1). Analysis of various emails from Mirza Pena and team regarding continued access issues to BANA accounts (.2). Conference with B. Funk regarding cash collateral and related conference coordination issues with BANA team (.2).	1.30	897.00
08/20/24	JDC	Email communications with Tom Kiriakos and B. Funk regarding scheduling (.1). Related communication with MHKH team in preparation for same (.1).	0.20	138.00
08/23/24	BLF	Review and consider comments from BANA to cash collateral order (.2); conference with J. Cornwell regarding same (.1); correspondence with client team regarding same (.2); complete final review and coordinate filing of cash collateral order (.3).	0.80	480.00
08/23/24	JDC	Email communication with Charles Haddad and B. Funk regarding BANA cash collateral order revisions and related strategy (.1). Email communication with Mayer Brown team regarding revised cash collateral budget and filing proposed agreed order (.2). Review of BANA revisions to proposed final cash collateral budget (.3); conference with B. Funk regarding strategy (.2).	0.80	552.00
08/30/24	ARP	Review statement filed by Bank of America regarding use of cash collateral.	0.20	100.00
08/30/24	JDC	Analysis of BANA statement regarding final cash collateral motion (.2). Conference with B. Funk regarding related strategy (.1).	0.30	207.00
Total for 05			17.40	10,834.00

Task Code: 07 Employment and Fee Applications

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/06/24	ARP	Correspond with B. Bass regarding research issue related to employment application standards.	0.30	150.00
08/07/24	ARP	Phone conference with B. Bass regarding research issue related to employment applications.	0.30	150.00
08/11/24	ARP	Review case law regarding standards related to retention applications.	0.60	300.00
08/12/24	ARP	Revise notice of commencement (.2); and correspond with S. McGuire of Stretto regarding issues related to service of first day orders and notice of case commencement (.5).	0.70	350.00
08/13/24	BLF	Review and respond to correspondence regarding billing procedures.	0.20	120.00

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08/16/24	JDC	Analysis of and preparation of revisions to MHKH employment application (.5). Conference with B. Funk and A. Perez regarding global edits to employment application and supporting declaration (.2). Analysis of revised application and preparation of additional edits (.4).	1.10	759.00
08/16/24	ARP	Revise Munsch Hardt employment application, declaration in support and related exhibits, and proposed order.	3.90	1,950.00
08/16/24	BLF	Attend to conflicts checks and retention application matters.	1.30	780.00
08/18/24	ARP	Revise application to employ Munsch Hardt and declaration of John Cornwell in support thereof (.5); and draft declaration of Charles Haddad in support of Munsch Hardt employment application (1.0).	1.50	750.00
08/18/24	BLF	Review and revise billing task codes for use in bankruptcy matter (.4); review and revise retention application papers and conduct research regarding same (1).	1.40	840.00
08/19/24	BLF	Attend to remaining open items on retention application and related papers (2.3); final review and comments to interim compensation procedures motion (.4).	2.70	1,620.00
08/19/24	ARP	Revise disclosures regarding utility providers contained in Cornwell declaration in support of Munsch Hardt employment application.	0.30	150.00
08/19/24	JDC	Review and preparation of revisions to draft MHKH employment application, Cornwell declaration, Haddad declaration, and appended exhibits (1.6). Conference with B. Funk regarding finalizing same (.2).	1.80	1,242.00
08/20/24	BLF	Attend to final review of retention application and interim compensation motion and coordinate filing and service of same.	1.10	660.00
08/20/24	HJV	Finalize and file employment application for Munsch Hardt and the interim compensation motion.	1.50	322.50
08/26/24	BLF	Correspondence with GH team regarding status of materials (.1); review and consider comments from UST's office regarding retention application and interim compensation motion (.2).	0.30	180.00
08/26/24	JDC	Analysis of comments from UST to MHKH retention application (.1). Analysis of comments from UST to interim compensation procedures proposed order (.1).	0.20	138.00
08/27/24	ARP	Review comments from J. Whitworth to Munsch Hardt employment application (.1); and review comments from J. Whitworth to interim compensation motion (.2).	0.30	150.00
08/29/24	JDC	Analysis of draft employment application and support declaration for Getzler, and preparation of significant revisions and additions to conform to prior MHKH application filing (2.4). Related coordination with B. Funk and A. Perez to finalize and circulate draft to Baumgartner (.2).	2.60	1,794.00
08/29/24	HJV	Conference with J. Cornwell regarding Getzler Henrich retention application (.1). Revise Getzler Henrich's retention application (1.1).	1.20	258.00

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08/30/24	ARP	Revise fee application for Getzler Henrich and Baumgartner declaration (1.0); draft proposed order authorizing employment of Getzler Henrich (.6); and draft correspondence to J. Baumgartner regarding application drafts and related issues (.1).	1.70	850.00
08/30/24	HJV	Prepare retention order for Getzler.	0.70	150.50
Total for 07			25.70	13,664.00

Task Code: 08 Asset Disposition

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/06/24	BLF	Correspondence with client team regarding next steps in sale process for DTC.	0.20	120.00
08/07/24	BLF	Correspondence with client team regarding conference on potential DTC sale.	0.20	120.00
08/08/24	BLF	Conference with J. Baumgartner regarding potential sales.	0.20	120.00
08/09/24	BLF	Prepare for and attend conference with potential broker for DTC property.	0.60	360.00
08/11/24	BLF	Research and review forms of sale procedures motions and orders.	2.30	1,380.00
08/12/24	BLF	Consider BANA requests for information and correspondence with Getzler team regarding same (.2); correspondence regarding conference regarding asset sales (.2); research tax issue and correspond with Mayer Brown regarding same (.3); review information related to Pinnacle Park and transmit same to Mayer Brown (.3).	1.00	600.00
08/12/24	JDC	Coordination with B. Funk regarding conference scheduling with Mayer Brown team (.1). Email communication with Mayer Brown team regarding Pinnacle Park Land diligence (.1).	0.20	138.00
08/13/24	BLF	Conferences with J. Cornwell in preparation for client call and call with Mayer Brown (.2); prepare for and attend client call regarding asset disposition options (1); conferences with A. Perez regarding sales order precedent in bankruptcy court (.3); prepare for and attend conference with Mayer Brown (.7); coordinate transmittal of valuation information to Mayer Brown (.2); follow-up correspondence with client team and Mayer Brown regarding potential broker fees (.2).	2.60	1,560.00
08/13/24	JDC	Analysis of email from Charles Haddad regarding Pinnacle Park Land purchase inquiry (.1). Conference with Mayer Brown team and B. Funk to discuss sale processes, cash collateral usage, valuation information, and other case issues (.7). Strategy communications with MHKH and Getzler teams (.3). Telephone conference with John Baumgartner regarding various sale and plan strategy items (.2).	2.20	1,518.00
08/19/24	BLF	Review and consider proposed amendment to sale agreement.	0.20	120.00
08/20/24	BLF	Review diligence list from BANA and transmit same to Getzler team for assistance.	0.20	120.00

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08/21/24	BLF	Conference with Mayer Brown regarding asset disposition matters (.5); correspondence with Mayer Brown and client team regarding coordinating site visits for valuation (.5); correspondence with client team regarding updates from BANA (.2).	1.20	720.00
08/21/24	JDC	Conference with B. Funk regarding final cash collateral hearing preparation and DTC/Pinnacle Park Land sale strategies (.3). Preparation for and conference with BANA team regarding various updates and go-forward strategy, including with respect to cash collateral final hearing and sale strategies (.7). Follow-up conference with B. Funk regarding same (.2). Email communications with Charles Haddad and B. Funk regarding BANA properties due diligence requests (.1).	1.30	897.00
08/26/24	JDC	Strategy conference with B. Funk to discuss sale processes/motions and other case issues.	0.30	207.00
08/27/24	JDC	Conference with B. Funk regarding various strategy matters, including Pinnacle Park Land sale process and potential buyer follow-up (.1); continued conference adding John Baumgartner (.4). Preparation of strategy email to Charles Haddad regarding Pinnacle Park Land strategy proposal (.2).	0.70	483.00
08/27/24	BLF	Conference with client regarding status of DTC proposed sale (.1); consider options for sale of Pinnacle Park land and conferences with J. Cornwell and J. Baumgartner regarding same (1.1).	1.20	720.00
08/28/24	JDC	Conference coordination with CBRE team (.1). Analysis of Pinnacle Park historical environmental diligence materials and related communication with Rod Olivero (.2). Preparation of email to Greenberg Traurig team to discuss Creation contract regarding sale of Pinnacle Park Land and conference scheduling (.1). Conference with CBRE team regarding DTC sale structure, engagement, and bankruptcy process (.5).	0.90	621.00
08/28/24	BLF	Conference with prospective broker regarding DTC sale (.5); consider timing and form of motions to sell and retain broker (.8).	1.20	720.00
08/30/24	JDC	Conference with Creation counsel at Greenberg Traurig regarding Pinnacle Park Land (.5). Conference with B. Funk regarding Pinnacle Park Land sale strategy (.2).	0.70	483.00
08/30/24	BLF	Consider, research and work on sale motions.	1.60	960.00
Total for 08			19.00	11,967.00

Task Code: 12

Tax Matters/Taxing Authorities

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/12/24	JDC	Analysis of various emails from John Baumgartner regarding Woodward Oaks and Pinnacle Park land taxes and other payables.	0.20	138.00
Total for 12			0.20	138.00

Task Code: 13 Business Operations

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/19/24	BLF	Conference with counsel for tenant regarding ongoing operations.	0.10	60.00
08/26/24	BLF	Review numerous correspondence regarding status of Bank of America diligence through scheduled inspections.	0.40	240.00
08/26/24	JKR	Communications with J. Gibbs regarding Sompo insurance funds.	0.20	120.00
08/27/24	JKR	Additional communications with Sompo's counsel regarding insurance settlement funds.	0.10	60.00
08/29/24	BLF	Consider implications of continued tenant deposits and correspondence with client team regarding same.	0.10	60.00
Total for 13			0.90	540.00

Task Code: 14 Reporting/MORs

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/06/24	BLF	Conference with client team and J. Baumgartner regarding bankruptcy reporting requirements.	0.70	420.00
08/12/24	ARP	Correspond with J. Whitworth providing information for service of US Trustee fee bills.	0.20	100.00
08/13/24	ARP	Draft correspondence to J. Whitworth and G. Otto regarding 341 meeting (.1); draft correspondence to J. Baumgartner and R. Olivero regarding bank account compliance issues (.2).	0.30	150.00
Total for 14			1.20	670.00
Total			231.90	\$119,088.50

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Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	John D. Cornwell	JDC	690.00	39.10	26,979.00
Shareholder	Justin K. Ratley	JKR	600.00	0.30	180.00
Shareholder	Brenda L. Funk	BLF	600.00	70.00	42,000.00
Associate	Beverly A. Bass	BAB	380.00	1.00	380.00
Senior Attorney	Alexander R. Perez	ARP	500.00	82.20	41,100.00
Paralegal	Heather J. Valentine	HJV	215.00	39.30	8,449.50
Total				231.90	\$119,088.50

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/25/24	Judicial Transcribers of Texas, LLC - Copies of Court Transcripts - Case #24-90436-11 / Judge Christopher M. Lopez - Hearing - 08/08/24 - 50 pages transcribed.	365.00
Total		\$365.00

Cost Summary

<u>Description</u>	<u>Amount</u>
Copies of Court Transcripts	365.00
Total	\$365.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	Case Administration/Noticing	46.10	14,374.00
02	General Bankruptcy Advice/Opinions	24.10	14,193.00
03	Schedules, SOFA, IDI and 341 Meeting	29.10	13,994.50
04	First and Second Day Matters/Hearings	68.20	38,714.00
05	Cash Collateral and Postpetition Financing	17.40	10,834.00
07	Employment and Fee Applications	25.70	13,664.00
08	Asset Disposition	19.00	11,967.00
12	Tax Matters/Taxing Authorities	0.20	138.00
13	Business Operations	0.90	540.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10537901

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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September 12, 2024

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
14	Reporting/MORs	1.20	670.00
Total		231.90	\$119,088.50



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
Fax 214.855.7584
munsch.com

The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: September 12, 2024
Invoice Number: 10537901
Matter Number: 021990.00002

For Professional Services through August 31, 2024

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	119,088.50
Total Costs	\$	365.00
Total Balance Due	\$	119,453.50

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.



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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: October 22, 2024
Invoice Number: 10541619
Matter Number: 021990.00002

*For Professional Services through **September 30, 2024***

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	66,494.50
Total Costs	\$	<u>341.26</u>
TOTAL THIS INVOICE	\$	66,835.76
Previous Balance	\$	<u>23,817.70</u>
Total Balance Due	\$	90,653.46

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10541619
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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October 22, 2024

Fee Detail

Task Code: 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	HJV	Prepare notice of filing of master service list (.2). Finalize and file same (.1).	0.30	64.50
09/04/24	HJV	Identify creditors that can be removed from the creditor matrix (.5). Email to Stretto team regarding same (.1). Confer with A. Perez regarding disclosing Pinnacle Park Land's EIN and filing of schedules and statements (.2). Prepare notice of disclosure of same (.1). Revise, finalize and file periodic report (.8).	1.70	365.50
09/05/24	HJV	Email to Stretto requesting amended creditor matrix (.1).	0.10	21.50
09/05/24	ARP	Revise notice of disclosure of federal employer identification number for TAF Pinnacle Park Land.	0.30	150.00
09/06/24	ARP	Correspond with H. Valentine regarding final comments to disclosure of tax identification number for Pinnacle Park Land.	0.10	50.00
09/09/24	HJV	Finalize and file notice of disclosure of EIN for Pinnacle Park Land (.1). Finalize and file master service list (.2).	0.30	64.50
09/11/24	ARP	Investigation into status of potential party in interest and respond to correspondence.	0.40	200.00
09/12/24	HJV	File amended creditor matrix and pay related filing fee.	0.20	43.00
09/16/24	ARP	Prepare notice of master service list.	0.20	100.00
Total for 01			3.60	1,059.00

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/02/24	BLF	Consider case deadlines and correspondence with A. Perez regarding same.	0.10	60.00
09/04/24	ARP	Draft correspondence to A. Nutter providing response to party in interest inquiry.	0.20	100.00
09/07/24	ARP	Attention to correspondence with J. Cornwell and B. Funk regarding outstanding items and priority tasks.	0.10	50.00
09/10/24	HJV	Team meeting to discuss upcoming deadlines of case (.4).	0.40	86.00
09/10/24	ARP	Case strategy work session with J. Baumgartner regarding pending matters (1.5); and case strategy work session with B. Funk and H. Valentine regarding next steps for outstanding and open items (.5).	2.00	1,000.00
09/10/24	BLF	Attend strategy conference with client, J. Baumgartner and A. Perez (.9); prepare for and attend WIP meeting with A. Perez and H. Valentine (.6).	1.50	900.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10541619

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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October 22, 2024

09/12/24	JDC	Conference with B. Funk regarding updates following 341 meeting and preparation, cash collateral negotiations and conference with Mayer Brown, and sale process communications (.4). Strategy conference with A. Perez regarding related updates and next steps (.2).	0.60	414.00
09/12/24	ARP	Case strategy conference with J. Cornwell providing case updates and analysis regarding lead up to and conclusion of 341 meeting (.2); and multiple case strategy conferences with B. Funk and H. Valentine regarding amendment of creditor matrix and notice of hearing issues (.3).	0.50	250.00
09/16/24	JDC	Conference with Getzler team regarding various budget items, sales updates, and plan modeling.	0.70	483.00
09/16/24	ARP	Case strategy work session with J. Cornwell and B. Funk regarding outstanding tasks, approaches regarding assets sales, and evidentiary issues.	0.20	100.00
09/16/24	BLF	Conference with Getzler team and J. Cornwell regarding case matters status and strategy for next steps.	0.70	420.00
09/16/24	JDC	Conference with B. Funk and A. Perez regarding DTC sale procedures, plan preparation, Pinnacle Park updates, and general case strategy.	0.30	207.00
09/18/24	ARP	Case strategy phone conference with C. Haddad, J. Cornwell, and B. Funk regarding asset sales and related issues.	0.50	250.00
09/24/24	JDC	Telephone conference with Mirza Pena regarding property tax reserves and related strategy.	0.20	138.00
09/24/24	BLF	Correspondence with A. Perez and J. Cornwell regarding outstanding client requests.	0.10	60.00
09/25/24	JDC	Conference with B. Funk regarding various outstanding items and strategy, including Pinnacle Park and plan formulation strategies.	0.30	207.00
09/26/24	JDC	Telephone conference with Mirza Pena regarding DTC roof repair, accounting, and reserve questions (.3). Related email coordination with B. Funk (.1).	0.40	276.00
09/27/24	JDC	Telephone conference with Mirza Pena regarding tax reserve and other strategic issues (.2); related email communication with Mirza Pena (.1). Telephone conference with B. Funk regarding related strategy (.3).	0.60	414.00
09/27/24	BLF	Conference with J. Cornwell regarding questions from client team (.3); conference with J. Baumgartner regarding status of invoices for roof repair (.5); correspondence with A. Perez regarding status of projects (.1).	0.90	540.00
09/30/24	JDC	Conference with Mirza Pena and B. Funk to discuss various strategic, accounting, sale, and other matters.	0.60	414.00

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10541619
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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October 22, 2024

09/30/24	BLF	Conferences with A. Perez and J. Baumgartner regarding status of matters (.7); conference with J. Cornwell and M. Pena regarding status of pending matters on case and strategy (.7); conferences with J. Cornwell regarding case updates (.2).	1.60	960.00
Total for 02			12.50	7,329.00

Task Code: 03 Schedules, SOFA, IDI and 341 Meeting

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/02/24	ARP	Review draft schedules and statements of financial affairs circulated by S. McGuire (2.3); phone conference with M. Pena, A. Jimenez, J. Baumgartner, R. Olivero, and B. Kim regarding outstanding information and issues related to the draft schedules and statements of financial affairs (.6); multiple correspondences with R. Olivero and B. Kim providing information and comments to the draft schedules and statements of financial affairs (.5); draft global notes to schedules and statements of financial affairs (2.7); draft correspondence to J. Baumgartner, R. Olivero, and B. Kim regarding preparation of disclosure in compliance with Rule 2015.3 (.3).	6.40	3,200.00
09/03/24	ANW	Telephone conference with John Cornwell regarding effect of recording Deed of Release in Dallas County.	0.40	210.00
09/03/24	HJV	Confer with A. Perez regarding revisions to schedules and statements (.2). Revise debtors' initial reports and send to Charles Haddad for signature (1.0). Review signed reports received from client and email to team regarding same (.2).	1.20	258.00
09/03/24	ARP	Review revised drafts of schedules and statements (2.8); multiple correspondences with M. Pena, A. Jimenez, D. Macias, J. Baumgartner, R. Olivero, and B. Kim regarding incorporation of information and detailed comments and responses in preparation of final revisions to the schedules and statements (3.0); multiple phone conference work sessions with M. Pena, A. Jimenez, D. Macias, J. Baumgartner, R. Olivero, and B. Kim discussing outstanding items and detailed comments and information necessary for preparation of final revisions to the schedules and statements (2.5); revise global notes to schedules and statements (1.5); work session regarding finalization of Initial Debtor Reports (.4); draft correspondence to UST's office providing Initial Debtor Reports (.2); and review draft disclosure in compliance with Rule 2015.3 (.3).	10.70	5,350.00
09/03/24	JDC	Communications with B. Funk regarding deed releases filed by BANA (.1). Conference with A. Wall regarding same (.3). Conference with A. Perez regarding status of draft schedules and SOFA (.2).	0.60	414.00
09/03/24	BLF	Correspondence regarding IDR (.1); conference re: IDR and schedules with J. Baumgartner and A. Perez (.2); conference with J. Cornwell regarding deed of release (.2).	0.50	300.00

Munsch Hardt Kopf & Harr, P.C.

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Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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09/04/24	BLF	Review schedules and statements and conferences with A. Perez and Getzler team regarding same (1.8); correspondence regarding form 2015.3 (.2).	2.00	1,200.00
09/04/24	HJV	Finalize and file schedules and statements for all 12 Aztec debtors.	2.30	494.50
09/04/24	ARP	Attend initial debtor interview (.5); attention to correspondences with UST's office regarding deliverables as follow up to initial debtor interview (.4); review revised draft schedules and statements of financial affairs (2.5); multiple correspondences with M. Pena, A. Jimenez, D. Macias, J. Baumgartner, R. Olivero, B. Kim, and S. McGuire regarding detailed final comments and responses to the schedules and statements of financial affairs (2.0); multiple phone conference work sessions with M. Pena, A. Jimenez, D. Macias, J. Baumgartner, R. Olivero, B. Kim, S. McGuire, and B. Funk discussing outstanding items and detailed comments necessary to finalize the schedules and statements of financial affairs (2.0); revise global notes to schedules and statements (1.0); and revise draft disclosure in compliance with Rule 2015.3 (.4).	8.80	4,400.00
09/05/24	HJV	Organize file with recently filed schedules and statements (.8). Attention to dates and deadlines regarding Getzler Henrich retention application (.1). Confer with A. Perez (.1).	1.00	215.00
09/05/24	ARP	Correspond with M. Pena and J. Baumgartner regarding follow up issues to the filing of the statements of financial affairs.	0.40	200.00
09/06/24	JDC	Telephone conference with Charles Haddad regarding expectations for upcoming hearing, 341 meeting preparations, sale status, and other updates.	0.20	138.00
09/06/24	ARP	Correspond with J. Baumgartner regarding coordination of 341 preparation session (.1).	0.10	50.00
09/09/24	HJV	Preparation of binders for 341 Meeting preparation (1.3). Conferences with A. Perez regarding same (.3).	1.60	344.00
09/09/24	ARP	Meeting with J. Baumgartner regarding issues and topics for 341 meeting preparation (.6); meeting with B. Funk regarding issues and topics for 341 meeting preparation (.2); prepare correspondence to J. Baumgartner consolidating topics and issues to discuss with C. Haddad (.3); preparatory meeting with C. Haddad and J. Baumgartner regarding issues and topics for 341 meeting (3.5); attention to correspondence with J. Whitworth, C. Haddad, J. Baumgartner, and B. Funk confirming telephonic participation only at 341 meeting (.1); and case strategy discussion with B. Funk providing follow up to 341 preparation session (.3).	5.00	2,500.00
09/10/24	ARP	Case strategy work session with C. Haddad, B. Funk, and J. Baumgartner regarding open items and issues in advance of 341 meeting (1.2); attend 341 meeting of creditors (.4); and discussion with C. Haddad, B. Funk, and J. Baumgartner as follow up to conclusion of 341 meeting (.1).	1.70	850.00
09/10/24	BLF	Prepare for and attend 341 meeting.	0.60	360.00

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Matter Number: 021990.00002

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Client: The Aztec Fund Holding, Inc.

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October 22, 2024

09/29/24	JDC	Communications with John Baumgartner and B. Funk regarding amendment of schedules to reflect post-foreclosure entities' assets/cash position.	0.10	69.00
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Total for 03	43.60	20,552.50
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Task Code: 04 First and Second Day Matters/Hearings

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	HJV	Prepare certificates of no objection as to the cash management and cash collateral motions (1.2). Prepare exhibits to certificate of no objection (.4).	1.60	344.00
09/03/24	ARP	Correspond with T. Kiriakos regarding Bank of America's compliance with section 345(b) of the Bankruptcy Code.	0.20	100.00
09/06/24	ARP	Draft correspondence to T. Kiriakos regarding compliance with section 345(b) of the Bankruptcy Code (.4); phone conference with J. Whitworth regarding response to US Trustee comments to certain proposed orders (.1); draft correspondence to J. Whitworth confirming DIP designation on Debtors' bank accounts (.1).	0.60	300.00
09/11/24	BLF	Review and revise certificates of no objection and revised proposed orders for filing and coordinate same with H. Valentine for filing.	1.30	780.00
09/11/24	ARP	Phone conference with J. Whitworth regarding extension and proposed resolution of issue in final cash management proposed order (.1); revise final cash management order (.2); correspond with J. Whitworth regarding approval of revised final cash management order (.2); revise draft certificates of no objection for proposed orders on cash management motion, interim compensation motion, and Munsch Hardt retention application (.6); review revised proposed orders to be submitted with Certificates of No Objection (.6); attention to correspondence with B. Funk and H. Valentine regarding final comments and issues related to the draft certificates of no objection for proposed orders on cash management motion, interim compensation motion, and Munsch Hardt retention application (.6); review filed certificates of no objection for proposed orders on cash management motion, interim compensation motion, and Munsch Hardt retention application (.3); draft correspondence to R. Saldana regarding filing of certificates of no objection for proposed orders on cash management motion, interim compensation motion, and Munsch Hardt retention application (.1); and phone conferences with R. Saldana regarding hearing status and potential hearing dates (.2).	2.90	1,450.00
09/12/24	ARP	Review interim compensation order, Munsch Hardt retention application order, and final cash management order (.3).	0.30	150.00
09/19/24	JDC	Analysis of email from Tom Kiriakos regarding BANA regulatory inquiry regarding DIP accounts.	0.10	69.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

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Client: The Aztec Fund Holding, Inc.

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October 22, 2024

09/25/24	ARP	Correspond with L. Holl Chang regarding issues related to Bank of America's provision of proof of section 345(b) compliance.	0.30	150.00
09/27/24	ARP	Correspond with L. Holl Chang regarding Bank of America's provision of documents to the US Trustee (.1); and draft correspondence to J. Whitworth and US Trustee team seeking confirmation of the Debtors' compliance with DIP account requirements (.2).	0.30	150.00
Total for 04			7.60	3,493.00

Task Code: 05 Cash Collateral and Postpetition Financing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/05/24	BLF	Review outstanding issues on cash collateral order and correspondence with M. Pena regarding same.	0.30	180.00
09/06/24	BLF	Conference with Mayer Brown team on open items.	0.30	180.00
09/06/24	JDC	Analysis of communications between B. Funk, John Baumgartner, and BANA team regarding loan amounts and cash collateral order finalization.	0.20	138.00
09/09/24	BLF	Monitor correspondence regarding status of analysis for cash collateral order.	0.40	240.00
09/11/24	BLF	Prepare for and attend conference with counsel for Bank of America regarding cash collateral order and other open matters (.5); conference and correspondence with A. Perez regarding language of interim order (.1); review language and consider next steps (.2).	0.80	480.00
09/11/24	HJV	Prepare notice of hearing on cash collateral.	0.20	43.00
09/11/24	ARP	Conduct review of interim cash management order regarding procedure for agreed continued use of cash collateral.	0.40	200.00
09/11/24	JDC	Email communications with Lisa Holl Chang and B. Funk regarding cash collateral order revisions and updates relating to BANA claim amount (.2). Telephone conference with B. Funk regarding proceeding with additional interim cash collateral order by agreement with BANA (.2).	0.40	276.00
09/12/24	ARP	Prepare notice of continued final cash collateral hearing.	0.30	150.00
09/12/24	JDC	Email communication with John Baumgartner regarding Bowie property tax and budget implications.	0.10	69.00
Total for 05			3.40	1,956.00

Task Code: 07 Employment and Fee Applications

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10541619

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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October 22, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/04/24	HJV	Finalize and file application to employ Getzler Henrich (.7).	0.70	150.50
09/04/24	ARP	Revise employment application of Getzler Henrich (1.5); review comments to application documents from Getzler Henrich's general counsel (.3); multiple phone conferences with J. Baumgartner regarding comments and revisions to the Getzler Henrich's employment application (.5); and multiple correspondences with J. Baumgartner regarding comments to Getzler Henrich's application documents (.5).	2.80	1,400.00
09/06/24	JDC	Communications with client team and John Baumgartner regarding transmittal and review of Getzler invoices.	0.10	69.00
09/06/24	ARP	Case strategy work session with B. Funk regarding retention application for CBRE in relation to DTC property (.3); and attention to correspondence with A. Jimenez regarding Getzler Henrich invoices (.3).	0.60	300.00
09/08/24	ARP	Draft employment application for CBRE as listing agent for DTC property.	1.10	550.00
09/09/24	HJV	Research regarding employment applications for appraisers and email to A. Perez regarding same.	0.20	43.00
09/09/24	ARP	Review comments from J. Whitworth to proposed order on Getzler Henrich's employment application (.3); discuss comments from US Trustee to proposed order on Getzler Henrich's employment application with J. Baumgartner (.1).	0.40	200.00
09/10/24	ARP	Draft and revise CBRE retention application (.5); draft declaration in support of CBRE retention application (.6); draft proposed order on CBRE retention application (.6); and discussion with J. Baumgartner regarding detailed analysis of US Trustee comments to proposed order on Getzler Henrich retention application (.4).	2.10	1,050.00
09/10/24	HJV	Preparation of certificates of no objection as to the retention application for Munsch Hardt (.3) and the interim compensation application. (.3). Begin preparation of first monthly fee statement (.5).	1.10	236.50
09/11/24	HJV	Review August invoice (1.0). Emails to J. Cornwell, A. Perez and E. Pinales regarding same (.1). Conference with A. Perez regarding status of certificates of no objection (.2). Revise certificates of no objection for retention application, cash management motion, and interim compensation motion (1.0). Prepare new redlines (.2). Emails to B. Funk with certificates of no objection, redlines and proposed orders for review and final approval (.5). Finalize and file certificates of no objection for Munsch Hardt's retention application, interim compensation motion, and cash management motion (1.2). Multiple emails with team regarding same (.2).	4.40	946.00
09/11/24	ARP	Prepare mark up of fee bill for August time entries.	0.40	200.00
09/12/24	HJV	Continue review and revisions of August invoice in preparation for drafting fee statement (1.4). Prepare monthly fee statement for August (1.5). Confer with A. Perez regarding John Baumgartner's declaration (.1). Finalize and file supplemental declaration of John Baumgartner (.7).	3.70	795.50

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10541619

Client: The Aztec Fund Holding, Inc.

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October 22, 2024

09/12/24	JDC	Coordination with H. Valentine regarding preparation of invoice summary, task code and time entry review, and fee application procedures for the case (.1). Review of invoicing to confirm compliance with applicable rules (.4).	0.40	276.00
09/12/24	ARP	Review first supplemental declaration of John Baumgartner in support of Getzler Henrich employment application (.3); multiple correspondences with J. Baumgartner regarding and coordinating filing of his first supplemental declaration (.3); phone conference with Campbell Davis, B. Funk, and M. Pena regarding CBRE retention and related issues (.3); and revise CBRE retention application and declaration of Campbell Davis in support thereof (.8).	1.70	850.00
09/13/24	JDC	Analysis of interim fee statement summary and coordinate minor revisions with A. Perez (.3). Coordination with team regarding transmitting same and assisting Getzler with preparation and service (.1).	0.40	276.00
09/13/24	ARP	Revise CBRE retention application and declaration in support thereof (.5); draft correspondence to Campbell Davis regarding draft proof of claim documents (.3); revise and finalize Munsch Hardt's first monthly fee statement (.6); correspond with J. Baumgartner regarding issues related to monthly fee statement format and filing (.3); and prepare service correspondence for Munsch Hardt first monthly fee statement (.1).	1.80	900.00
09/16/24	ARP	Correspond with C. Davis regarding CBRE retention application and process.	0.10	50.00
09/17/24	ARP	Phone conference with C. Davis regarding CBRE retention application process and connections checks.	0.10	50.00
09/18/24	ARP	Draft follow up correspondence to C. Davis regarding parties in interest and process for completion of connections checks.	0.80	400.00
09/19/24	JDC	Coordination of service of MHKH invoices and confirmation of service of summary interim billing.	0.10	69.00
09/19/24	ARP	Draft correspondence to C. Haddad, M. Pena, and J. Baumgartner regarding first monthly fee statement and invoice.	0.10	50.00
09/23/24	ARP	Review correspondence and revisions to proposed order on Getzler Henrich employment application sent by J. Baumgartner (.5); correspond with J. Baumgartner regarding proposed revisions to proposed order on Getzler Henrich employment application (.2); and correspond with J. Whitworth providing comments from Getzler Henrich to proposed order on Getzler Henrich employment application (.2).	0.90	450.00
09/24/24	HJV	Prepare certificate of no objection on Getzler Henrich's retention application (.6). Email to A. Perez regarding same (.1).	0.70	150.50
09/25/24	ARP	Correspond with J. Whitworth regarding resolution of final comments to proposed order on Getzler Henrich retention application.	0.30	150.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10541619

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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October 22, 2024

09/26/24	HJV	Review UST comments, proposed order, certificate of no objection (.2). Revise and prepare redline comparison for filing (5.). Email to J. Baumgartner for final approval (.1). Finalize and file same (.1).	0.90	193.50
09/26/24	ARP	Prepare revised proposed order on Getzler Henrich employment application incorporating all comments from US Trustee and Getzler Henrich (.4); revise certificate of no objection regarding Getzler Henrich employment application (.1); and attention to correspondence with J. Baumgartner regarding certificate of no objection and proposed order (.2).	0.70	350.00
09/27/24	HJV	Email to R. Saldana regarding certificate of no objection.	0.10	21.50
09/27/24	ARP	Correspond with A. Blanadet regarding service of order on Getzler Henrich employment application.	0.10	50.00
Total for 07			26.80	10,227.00

Task Code: 08 Asset Disposition

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/03/24	HJV	Research sale/auction of Pinnacle Park (.2). Email to client regarding same (.1).	0.30	64.50
09/04/24	BLF	Conference regarding potential sale of land.	0.40	240.00
09/04/24	JDC	Conference with B. Funk regarding DTC and Pinnacle Park sale motion and process status and related strategy (.2). Conference with Creation counsel regarding improving sale contract for Pinnacle Park (.3). Conference with Creation legal team regarding Pinnacle Park contract (.3).	0.70	483.00
09/05/24	BLF	Review precedent and revise draft sale motion.	1.30	780.00
09/05/24	JDC	Communications with B. Funk regarding DTC sale strategy, specifically relating to CBRE fees in the event of credit bidding and timing strategy.	0.20	138.00
09/10/24	HJV	Prepare notice of bid procedures.	0.70	150.50
09/12/24	BLF	Review and revise sale motion (1.2); transmit same to various parties and set up conferences to discuss (.3); conference regarding proposed details of bid process (.5).	2.00	1,200.00
09/16/24	ARP	Case strategy work sessions with B. Funk regarding vendor issue related to proposed sale of DTC.	0.20	100.00
09/16/24	BLF	Continue work on sale motion and related papers (6.4); conferences with J. Cornwell and A. Perez regarding status (.2); correspondence with J. Baumgartner regarding cure amounts (.1); review schedules and statements for TAF DTC related to sale (.5).	7.20	4,320.00
09/17/24	BLF	Review and revise draft sale papers (1.6); multiple correspondence with Mayer Brown and client team regarding same (.5).	2.10	1,260.00
09/17/24	JDC	Analysis of draft sale procedures motion for DTC sale and transmittal of same to BANA.	0.30	207.00

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10541619
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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October 22, 2024

09/17/24	HJV	Prepare draft Cure Notice for DTC property (1.0). Prepare draft Bid Procedures Order (1.2).	2.20	473.00
09/18/24	JDC	Communications with client team regarding unsolicited purchase inquiry relating to Windward Oaks (.1). Analysis of email from Tom Kiriakos regarding DTC sale motion draft (.2). Telephone conference with Charles Haddad and B. Funk regarding DTC and Pinnacle Park sale strategies (.3). Preparation of response email to Creation legal team regarding Pinnacle Park contract and building sale status (.2).	0.80	552.00
09/19/24	BLF	Correspondence and conferences regarding changes to sale motion and related papers.	0.70	420.00
09/20/24	BLF	Review and revise motion and bid procedures order to incorporate comments from various parties (1); conference with CBRE regarding proposed changes (.2).	1.20	720.00
09/20/24	JDC	Analysis of email from B. Funk to client team regarding DTC sale comments from BANA, and analysis of various follow-up communication from Charles Haddad and Mirza Pena (.2). Analysis of related communication to CBRE (.1).	0.30	207.00
09/22/24	BLF	Complete preparation of motion and related papers.	1.60	960.00
09/23/24	BLF	Review proposed changes to motion and correspondence with A. Perez regarding same (.3); review files for deed of trust and correspondence with H. Valentine regarding same and with Stretto regarding service of motion (.5).	0.80	480.00
09/23/24	JDC	Coordination with team regarding finalization and filing of DTC sale procedures motion and related coordination with BANA team.	0.20	138.00
09/23/24	ARP	Prepare final revisions to DTC sale motion, proposed order, sale notice, and cure notice (3.3); correspond with T. Kiriakos regarding DTC sale Motion (.2); prepare revision to Motion in response to comment from T. Kiriakos (.3); review filed DTC sale motion (.1).	3.90	1,950.00
09/24/24	JDC	Attention to communication from CBRE team regarding DTC sale.	0.10	69.00
09/26/24	JDC	Email communications with Ashley Montalbano regarding Pinnacle Park building and land sale.	0.20	138.00
09/26/24	BLF	Review correspondence regarding DTC invoices and correspondence with J. Cornwell regarding same.	0.10	60.00
Total for 08			27.50	15,110.00

Task Code: 10 Bar Date and Claims Administration

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/12/24	ARP	Revise bar date motion.	0.80	400.00
09/19/24	BLF	Conference with A. Perez regarding finalizing bar date motion.	0.30	180.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10541619

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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October 22, 2024

09/19/24	ARP	Work session with B. Funk regarding comments to bar date motion and proposed order (.3); prepare revisions to bar date motion and order (.7); correspond with S. McGuire regarding draft bar date motion and proposed order (.3); and review case-specific draft proof of claim form (.2).	1.50	750.00
09/20/24	HJV	Finalize and file bar date motion and order.	0.20	43.00
09/20/24	ARP	Correspond with A. Galvan regarding service of bar date motion and related issues.	0.30	150.00
Total for 10			3.10	1,523.00

Task Code: 11 Plan and Disclosure Statement

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/30/24	JDC	Conference with B. Funk regarding plan formulation, research issues, and strategy.	0.10	69.00
Total for 11			0.10	69.00

Task Code: 13 Business Operations

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/17/24	ARP	Draft 9019 motion for approval of insurance settlement with Endurance.	1.80	900.00
09/18/24	ARP	Review additional documents related to negotiations with insurance company (.8); and revise 9019 motion relating to insurance settlement for TAF Pinnacle Park (.8).	1.60	800.00
09/19/24	ARP	Case strategy work session with B. Funk regarding 9019 motion relating to insurance settlement for TAF Pinnacle Park (.1); and draft correspondence to Justin Ratley regarding 9019 motion (.2).	0.30	150.00
09/24/24	HJV	Begin preparation of 9019 motion and email to A. Perez regarding same.	0.30	64.50
09/24/24	JKR	Assist with explanation for Endurance settlement amount and coverage issues.	0.20	120.00
09/24/24	ARP	Case strategy work session with J. Ratley regarding disputed issues related to settlement with Endurance (.2); review correspondence related to proposed settlement with Endurance (.4); prepare revisions to draft 9019 motion regarding settlement agreement with Endurance (.8); prepare proposed order on 9019 settlement motion with Endurance (.5); and draft correspondence to Jennifer Gibbs, counsel for Endurance, regarding draft settlement motion and proposed order (.3).	2.20	1,100.00
09/24/24	JKR	Communications with opposing counsel regarding status of settlement.	0.10	60.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10541619

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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09/30/24	ARP	Case strategy work session with B. Funk regarding 9019 insurance settlement motion and process (.1); and prepare correspondence to counsel for insurance company regarding settlement terms and process (.2).	0.30	150.00
Total for 13			6.80	3,344.50

Task Code: 14 Reporting/MORs

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/26/24	ARP	Review monthly operating report instructions, regulations, and guidance as to timing requirements for initial reports (.3); and correspond with J. Baumgartner regarding status of monthly operating reports (.1).	0.40	200.00
09/29/24	ARP	Review correspondence from J. Baumgartner and B. Funk regarding treatment of cash for monthly operating reports.	0.20	100.00
09/29/24	BLF	Review and respond to correspondence regarding MORs.	0.10	60.00
09/30/24	ARP	Case strategy work session with J. Baumgartner and B. Funk regarding cash balances and reporting issues (.3); review draft MORs (.5); and multiple correspondences with J. Baumgartner regarding final issues related to MORs (.4).	1.20	600.00
Total for 14			1.90	960.00
Total			136.90	\$65,623.00

Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	Adrienne N. Wall	ANW	525.00	0.40	210.00
Shareholder	John D. Cornwell	JDC	690.00	9.30	6,417.00
Shareholder	Justin K. Ratley	JKR	600.00	0.30	180.00
Shareholder	Brenda L. Funk	BLF	600.00	28.90	17,340.00
Senior Attorney	Alexander R. Perez	ARP	500.00	71.60	35,800.00
Paralegal	Heather J. Valentine	HJV	215.00	26.40	5,676.00
Total				136.90	\$65,623.00

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10541619
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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October 22, 2024

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/12/24	Heather J. Valentine - Filing Fees: H Valentine; Filing fee for amended creditor matrix (U.S. Bankruptcy Court Southern District of Texas).	34.00
08/31/24	Secretary of State of Texas - Status Certificate - 1396614750002 - 1396614750006 - Mosaic Amber, LP, Mosaic Park Place, Mosaic Residential II, 802453329, Facts-Status	90.00
08/14/24	Capitol Services, LLC - Certificate of Good Standing - THE AZTEC FUND HOLDING, INC. (DE) - AZTEC OME HOLDINGS, INC (DE)	217.26
Total		\$341.26

Cost Summary

<u>Description</u>	<u>Amount</u>
Status Certificate	90.00
Certificate of Good Standing	217.26
Filing Fee	34.00
Total	\$341.26

Outstanding Invoices

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Total Balance</u>
09/12/24	10537901	119,453.50	95,635.80	23,817.70
Total				\$23,817.70



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
Fax 214.855.7584
munsch.com

The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: October 22, 2024
Invoice Number: 10541619
Matter Number: 021990.00002

For Professional Services through September 30, 2024

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	66,494.50
Total Costs	\$	341.26
TOTAL THIS INVOICE	\$	66,835.76
Previous Balance	\$	23,817.70
Total Balance Due	\$	90,653.46

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.



Ross Tower
500 N. Akard Street, Suite 4000
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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: November 20, 2024
Invoice Number: 10543978
Matter Number: 021990.00002

*For Professional Services through **October 31, 2024***

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	108,694.00
Total Costs	\$	<u>691.00</u>
TOTAL THIS INVOICE	\$	109,385.00
Previous Balance	\$	<u>37,116.60</u>
Total Balance Due	\$	146,501.60

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10543978
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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November 20, 2024

Fee Detail

Task Code: 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/03/24	HJV	Attention to calendaring dates and deadlines per interim compensation order, bar date and bid procedures motions (.4). Email to team with upcoming deadlines (.1).	0.50	107.50
10/15/24	HJV	Finalize and file master service list.	0.30	64.50
10/15/24	ARP	Review updated master service list.	0.10	50.00
10/24/24	ARP	Phone conference with K. Allen in response to inquiry related to noticing issue.	0.10	50.00
10/28/24	HJV	Attention to calendaring dates and deadlines regarding Application to Employ Hilco (.2). Update docket with recent filings (.2). Attention to dates and deadlines regarding BANA's motion for relief of stay (.3).	0.70	150.50
10/29/24	HJV	Emails with Stretto and team regarding returned mail for Cable Audit Assoc. (.1). Research address and information for Cable Audit and Media Audits International (.2). Confirm Media Audits International is a notice party (.3). Emails with B. Funk regarding same (.2). Prepare notice of filing master service list (.2). Finalize and file master service list (.1).	1.10	236.50
10/30/24	HJV	Prepare binders with Hilco and Ankura valuation reports for J. Cornwell and B. Funk's review (.5). Revise internal WIP list (.2). Preparation of certificate of no objection for Hilco retention application (.4).	1.10	236.50
Total for 01			3.90	895.50

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/03/24	BLF	Correspondence with Getzler team regarding next steps in case and related deadlines (.3); review file and set upcoming deadlines (.2); correspondence with J. Vasek regarding projects (.1).	0.60	360.00
10/04/24	BLF	Prepare for and attend advisors call.	1.10	660.00
10/04/24	JDC	Conference with B. Funk and John Baumgartner regarding plan formulation, schedules updates, cash collateral order status, sales status, and general case strategy.	0.50	345.00
10/10/24	BLF	Conference with J. Cornwell regarding status (.2); Prepare update correspondence to client team and coordinate conference regarding same (.2); correspondence with Getzler team regarding outstanding matters (.1).	0.50	300.00
10/11/24	BLF	Conference with J. Baumgartner regarding pending matters.	0.40	240.00
10/11/24	JDC	Various email communications with client team coordinating upcoming group conference to discuss updates and go-forward strategy.	0.20	138.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10543978

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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November 20, 2024

10/14/24	JDC	Preparation for client update meeting with B. Funk (.1). Conference with client and advisor team to discuss status and strategy (.8). Attention to scheduling follow-up client and advisor meeting (.1).	1.00	690.00
10/14/24	ARP	Case strategy work session with J. Cornwell and B. Funk in advance of group call regarding topics and recommendations (.1); and case strategy phone conference with J. Cornwell, B. Funk, J. Baumgartner, and client team regarding case updates, updates from Bank of America, and plan formulation strategy (.8).	0.90	450.00
10/17/24	BLF	Prepare for and attend WIP meeting.	0.60	360.00
10/17/24	HJV	Working team meeting regarding status and go forward strategy.	0.70	150.50
10/17/24	ARP	Case strategy work session with B. Funk and H. Valentine regarding outstanding work in process and related planning for upcoming deadlines.	0.80	400.00
10/21/24	BLF	Conferences with J. Cornwell regarding status of various matters.	0.30	180.00
10/22/24	BLF	Conference with M. Pena regarding open issues.	0.20	120.00
10/22/24	JDC	Preparation for client conference call, including coordination with B. Funk and John Baumgartner (.2). Conference with client and advisor team to discuss status, cash collateral updates, plan considerations, and general case issues (.9). Coordination with client team regarding follow-up conference (.1).	1.20	828.00
10/22/24	ARP	Case strategy work session and discussion with C. Haddad and client team, J. Baumgartner and team, J. Cornwell, and B. Funk regarding term sheet and plan modeling (1.5); and case strategy work session with J. Cornwell and B. Funk regarding term sheet and plan modeling issues (.7).	2.20	1,100.00
10/24/24	ARP	Case strategy phone conference with J. Baumgartner and Getzler Henrich team, M. Pena and client team, J. Cornwell, and B. Funk regarding budget issues and items (.5); and case strategy work session with J. Cornwell and B. Funk regarding issues raised on call with Bank of America (.4).	0.90	450.00
10/24/24	JDC	Telephone conference with Charles Haddad regarding meeting with BANA's counsel, cash collateral budget status, and general case strategy (.4). Preparation of update email to client team following BANA meeting and generally regarding case status (.2).	0.60	414.00
10/29/24	ARP	Case strategy phone conference with J. Cornwell, B. Funk, client team, Getzler Henrich team, and other professionals regarding motion for relief from stay, plan formulation, and other issues.	1.00	500.00

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Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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November 20, 2024

10/29/24	JDC	Conference with B. Funk regarding various strategy matters in advance of client conference call (.5). Review draft financial modeling in preparation for client call (.2). Conference with client and advisor teams to discuss status and strategy (1.0). Email communications with client team scheduling follow-up conference (.1).	1.80	1,242.00
10/30/24	ARP	Case strategy work session with J. Cornwell, B. Funk, and H. Valentine regarding outstanding tasks regarding plan formulation and case administration.	0.80	400.00
10/30/24	BLF	Conferences with J. Cornwell, A. Perez and H. Valentine regarding status of works in progress (1.5); correspondence with J. Vasek regarding projects (.1).	1.60	960.00
10/30/24	HJV	Work meeting to discuss next steps in case and strategy.	0.80	172.00
10/31/24	ARP	Phone conference with J. Cornwell, B. Funk, client team, including C. Haddad and M. Pena, Getzler Henrich team, and other advisors regarding potential plan terms and related strategy and issues.	1.40	700.00
10/31/24	BLF	Conferences with J. Cornwell regarding valuations and general strategy (.4); prepare for and attend conference with client team regarding strategy (1.5).	1.90	1,140.00
10/31/24	JDC	Telephone conference with B. Funk to prepare for client conference (.2). Detailed strategy conference with client and advisor teams (1.5).	1.70	1,173.00
Total for 02			23.70	13,472.50

Task Code: 03 Schedules, SOFA, IDI and 341 Meeting

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/24	JDC	Conference with B. Funk regarding post-foreclosure cash issues, MOR completion status, and schedules amendments.	0.20	138.00
10/03/24	BLF	Review materials for revisions to schedules and statements (1); correspondence with client and J. Baumgartner regarding same (.3).	1.30	780.00
10/03/24	JDC	Communications with J. Baumgartner regarding MOR status and Schedules amendment issues (.3). Conference with B. Funk regarding same (.2).	0.50	345.00
10/04/24	BLF	Prepare for and attend conference with Getzler team regarding reporting of cash in schedules and statements.	2.10	1,260.00
10/05/24	JDC	Telephone conference with John Baumgartner regarding treatment of cash in accounts of post-foreclosure entities.	0.20	138.00
10/07/24	BLF	Evaluate information from client team regarding payables and foreclosure (1); conference with Getzler team regarding approach for amended schedules and other strategy matters (1).	2.00	1,200.00
10/08/24	BLF	Conferences with J. Baumgartner and J. Cornwell regarding status (.3); meeting with J. Baumgartner and J. Cornwell (in part) regarding schedule amendments and related matters (5.6).	5.90	3,540.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

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Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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November 20, 2024

10/08/24	JDC	Conferences with John Baumgartner and B. Funk to discuss schedules amendment and related strategy.	0.40	276.00
10/09/24	BLF	Correspondence with J. Baumgartner regarding status of open issues related to schedules, MORs and related matters. (.1); conference with J. Cornwell regarding same (.1).	0.20	120.00
10/17/24	ARP	Phone conference with J. Baumgartner, J. Cornwell, and B. Funk regarding issues related to amended schedules and statements (.4); multiple case strategy work sessions with B. Funk regarding issues related to schedules and statements (.5); attention to numerous correspondences with J. Baumgartner and S. McGuire regarding proposed revisions to schedules and statements (.6); and case strategy phone conference with J. Baumgartner and S. McGuire regarding revised schedules and statements and service of bar date notice (.2).	1.70	850.00
10/17/24	JDC	Conference with John Baumgartner and B. Funk to discuss schedules and SOFA amendments and related strategy (.4). Telephone conference with Mirza Pena to discuss amendments and Getzler concerns (.3). Strategy conference with B. Funk and A. Perez (.2).	0.90	621.00
10/17/24	BLF	Prepare for and attend conference with Getzler team and J. Cornwell regarding status (.4); conference with M. Pena regarding amendments and strategy (.3).	0.70	420.00
10/18/24	JDC	Conference with B. Funk regarding schedules and SOFA amendments and related strategy (.2). Telephone conference with Mirza Pena regarding same (.3). Follow-up conference with B. Funk and A. Perez regarding strategy (.2). Additional telephone conference with Mirza Pena regarding New York trip, schedules amendments, and Getzler communications and other issues (.3). Various email communications between MHKH and client team regarding schedules amendments (.2).	1.20	828.00
10/18/24	BLF	Consider and respond to client questions regarding schedules and statements.	0.90	540.00
10/18/24	ARP	Multiple case strategy work sessions with B. Funk regarding schedule and statement issues.	0.30	150.00
10/19/24	JDC	Email and telephone communication with Daniel Macias regarding schedules amendments.	0.20	138.00
10/19/24	BLF	Monitor and respond to correspondence regarding schedules and statements.	0.30	180.00
10/20/24	JDC	Email update from Mirza Pena.	0.10	69.00
10/21/24	BLF	Consider and respond to questions regarding preparation of amended schedules and statements (.4); conference with M. Pena (.2); follow-up correspondence with J. Cornwell and notes regarding same (.1).	0.70	420.00
Total for 03			19.80	12,013.00

Task Code: 04

First and Second Day Matters/Hearings

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

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Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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November 20, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/24	ARP	Attention to correspondence with J. Whitworth, L. Holl Chang, and J. Baumgartner regarding the Debtors' compliance with section 345(b).	0.40	200.00
Total for 04			0.40	200.00

Task Code: 05 Cash Collateral and Postpetition Financing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/02/24	BLF	Review and revise August variance report and correspondence with Getzler team regarding same.	1.00	600.00
10/03/24	JDC	Attention to claim calculation and related final cash collateral strategy communications with, separately, Mirza Pena and B. Funk. Detailed telephone conference with John Baumgartner regarding analysis of BANA final claim amount and general case administration.	0.80	552.00
10/04/24	JDC	Email communications with Tom Kiriakos regarding loan history and final cash collateral order discussions, including between financial advisors.	0.10	69.00
10/07/24	JDC	Attention to various email communications from Mayor Brown team regarding outstanding loan amount calculation issues (.2). Conference with B. Funk regarding same and cash deposit amounts scheduling (.2).	0.40	276.00
10/08/24	JDC	Conference with John Baumgartner and B. Funk to resolve calculation and approval of BANA outstanding claim amount.	0.40	276.00
10/09/24	BLF	Review correspondence related to calculation of bank of America claim (.2); prepare correspondence to client team related to same (.2); conferences and further correspondence with client team regarding same (.2); prepare for and attend conference with bank of America team regarding updates (.5).	1.10	660.00
10/09/24	JDC	Email communication with client team regarding proposed final calculation of BANA claim amount (.1). Attention to communications between BANA and debtor representatives regarding reporting issues (.1). Conference with Tom Kiriakos, Lisa Holl Chang, and B. Funk to discuss cash collateral order updates, agreement on claim amount, and other updates and issues (.4).	0.60	414.00
10/10/24	BLF	Prepare revisions to cash collateral materials and multiple correspondence regarding same.	1.00	600.00
10/10/24	HJV	Prepare certificate of no objection on cash collateral motion (.6). Prepare notice of cancellation of hearing (.2). Prepare notice of status conference (.2).	1.00	215.00
10/11/24	BLF	Correspondence with J. Cornwell and Mayer Brown team regarding cash collateral order (.3); revise order (.2); revise hearing cancellation notice and notice of status conference (.2); final review of order and related CNO and coordinate filing of same (.9).	1.60	960.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

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Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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November 20, 2024

10/11/24	JDC	Communications with BANA team and the court regarding scheduling of status conference and passing upcoming hearing in light of cash collateral order agreement.	0.10	69.00
10/15/24	HJV	Prepare cash collateral order and email to court (.4). Prepare agenda for 10/15 hearing on final cash collateral order (.6). Prepare binder for B. Funk for 10/15 hearing (.5). Revise, finalize and file notice of cancellation of hearing (.2).	1.70	365.50
10/15/24	ARP	Correspond with C. Haddad and J. Baumgartner regarding entry of cash collateral order.	0.10	50.00
10/15/24	JDC	Coordination with team and client regarding final cash collateral hearing and agreed order entry.	0.20	138.00
10/22/24	JDC	Conference with B. Funk regarding updates relating to cash modeling and recent communications between client and Getzler teams.	0.20	138.00
10/23/24	BLF	Meeting with Getzler team, A. Perez and J. Cornwell regarding 13-wk cash flow and other case matters (2.7); multiple correspondence with client team regarding same (.7); conference with Getzler and client team regarding same (.4); follow-up call with J. Baumgartner regarding same (.2).	4.00	2,400.00
10/23/24	JDC	In-person meeting with John Baumgartner, B. Funk, and A. Perez to discuss budgeting and other financial modeling issues, including electronic conference with other Getzler team members.	2.80	1,932.00
10/24/24	BLF	Review and propose comments to various components of 13-week budget and monitor and respond to correspondence regarding same (2.9); prepare for and attend conference with Mayer Brown team regarding case status and motion to lift stay (.7).	3.60	2,160.00
10/24/24	JDC	Conference with B. Funk regarding cash collateral budget, upcoming hearing, and strategy (.2). Analysis of draft 13-week budget (.1). Conference with Getzler team regarding budgeting and general strategy (.8). Analysis of various email communications with Getzler team and B. Funk (.3). Telephone conferences with Mirza Pena (multiple) and John Baumgartner regarding cash forecast and budget issues (.8).	2.20	1,518.00
10/25/24	JDC	Analysis of proposed 13-week budget and transmittal email from B. Funk to BANA team (.2). Communications with Getzler team and B. Funk regarding budget revisions (.2). Email communication with Lisa Holl Chang regarding budget review (.1).	0.50	345.00
10/25/24	BLF	Review and revise 13-wk cash flow schedule and conferences with J. Cornwell regarding same (.8); correspondence with Mayer Brown and Ankura teams regarding budget (.1).	0.90	540.00
10/28/24	BLF	Prepare for and attend status conference.	0.80	480.00
10/28/24	JDC	Preparation for and attendance of cash collateral update status conference (.5). Communications with Tom Kiriakos (in person) and Lisa Holl Chang regarding same (.2).	0.70	483.00
10/30/24	JDC	Analysis of update email from John Baumgartner regarding Ankura meeting regarding cash forecast.	0.10	69.00

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Total for 05 25.90 15,309.50

Task Code: 06 Stay Matters

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/14/24	JDC	Conference with John Satter (Hilco), John Baumgartner, and B. Funk to discuss formal Hilco retention and expert opinion preparation to support Hilco valuations in light of BANA stay relief threats (.5). Follow-up strategy conference with B. Funk (.2).	0.70	483.00
10/23/24	JDC	Analysis of email from Lisa Holl Chang requesting meet-and-confer to discuss stay lift motion of BANA (.1). Communications relating to same with B. Funk (.1).	0.20	138.00
10/24/24	ARP	Phone conference with T. Kiriakos and counsel for Bank of America, J. Cornwell, and B. Funk conferring regarding lift stay motion and other outstanding issues.	0.60	300.00
10/24/24	BLF	Conference with J. Cornwell regarding next steps in light of proposed lift stay motion (.2); conference with Mayer Brown team regarding same (.3).	0.50	300.00
10/24/24	JDC	Conference with B. Funk in advance of meeting with Mayer Brown team (.1). Conference with Tom Kiriakos, Lisa Holl Chang, and B. Funk (.3).	0.40	276.00
10/28/24	ARP	Review motion for relief from the automatic stay filed by Bank of America.	1.50	750.00
10/28/24	JDC	Preliminary review of BANA's motion for stay relief.	0.50	345.00
10/29/24	JDC	Continued review of BANA motion for stay relief.	0.60	414.00
10/31/24	BLF	Review Ankura appraisals in connection with BANA's motion for relief from stay.	1.10	660.00

Total for 06 6.10 3,666.00

Task Code: 07 Employment and Fee Applications

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/24	ARP	Correspond with C. Campbell regarding retention application timing and issues.	0.20	100.00
10/03/24	BLF	Review and consider changes to CBRE application.	0.80	480.00
10/08/24	HJV	Prepare second monthly fee statement (September).	1.00	215.00
10/09/24	BLF	Review and revise monthly fee statement (.6); conferences with H. Valentine regarding same (.1); review and revise employment application for CBRE (2.4)	3.10	1,860.00
10/09/24	HJV	Attention to revisions to September invoice (1.7). Revise fee application (.2). Emails with B. Funk regarding final cash collateral order (.4).	2.30	494.50
10/10/24	BLF	Review and prepare revisions to September fee statement (.4); correspondence related to CBRE retention application documents (.2).	0.60	360.00

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10/10/24	JDC	Review of comments from B. Funk to invoice and additional revisions to same in advance of monthly fee request.	0.30	207.00
10/10/24	HJV	Review and make additional revisions to September invoice (.6). Emails with E. Pinales regarding same (.1).	0.70	150.50
10/11/24	BLF	Correspondence with CBRE counsel regarding retention (.3); review and revise papers related to retention (.4); complete final review of papers and coordinate filings of same (.9).	1.60	960.00
10/14/24	HJV	Attention to calendaring objection deadline to application to employ CBRE (.1). Prepare certificate of no objection (.5).	0.60	129.00
10/14/24	JDC	Coordination with A. Perez and H. Valentine regarding Hilco retention application preparation.	0.20	138.00
10/15/24	ARP	Work session with B. Bass regarding preparation of employment application for Hilco (.3); and correspond with B. Bass regarding Hilco employment application (.4).	0.70	350.00
10/15/24	BAB	Draft Hilco Retention Application including related Satter Declaration and Proposed Order (.2).	0.20	76.00
10/16/24	ARP	Work session with B. Bass regarding open issues on Hilco employment application and declaration in support thereof.	0.50	250.00
10/16/24	BAB	Draft Hilco Retention Application including related Satter Declaration and Proposed Order (7.3).	7.30	2,774.00
10/17/24	ARP	Work session with B. Bass regarding Hilco employment application (.3); and revise Munsch Hardt's second monthly fee statement (.3).	0.60	300.00
10/17/24	BAB	Draft Hilco Retention Application including related Satter Declaration and Proposed Order (3.2).	3.20	1,216.00
10/21/24	ARP	Revise application to employ Hilco Real Estate Appraisal.	2.20	1,100.00
10/22/24	BLF	Correspondence regarding retention application.	0.10	60.00
10/22/24	ARP	Revise declaration supporting Hilco application and proposed order.	0.30	150.00
10/22/24	ARP	Correspond with client regarding second monthly fee statement and invoice.	0.20	100.00
10/23/24	ARP	Revise draft Hilco employment application, Satter declaration, and retention order (1.8); and draft correspondence to J. Satter regarding same (.2).	2.00	1,000.00
10/24/24	ARP	Review revised Hilco retention application documents (.7); correspond with T. Dable regarding draft Hilco retention application documents (.3); and draft correspondence to C.Haddad regarding draft Hilco retention application documents (.2).	1.20	600.00
10/25/24	HJV	Finalize and file Hilco retention application and exhibits (.6). Email to Stretto regarding same (.1).	0.70	150.50
10/25/24	ARP	Prepare final revisions to Hilco employment application (1.4); and correspond with T. Dable regarding same (.2).	1.60	800.00
10/25/24	JDC	Review of and preparation of revisions to Hilco employment application (.3). Related communications with A. Perez (.1).	0.40	276.00
10/29/24	HJV	Revise certificate of no objection as to the application to employ CBRE.	0.20	43.00

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10/31/24	BLF	Correspondence with A. Perez and J. Vasek regarding BANA questions on CBRE retention application.	0.20	120.00
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Total for 07	33.00	14,459.50
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Task Code:	08	Asset Disposition
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/24	JDC	Email communications with Creation legal team regarding Pinnacle Park building sale and land sale status.	0.10	69.00
10/02/24	JDC	Conference with B. Funk regarding preparation of Pinnacle Park land sale motion and related strategy.	0.20	138.00
10/03/24	BLF	Correspondence related to status of sale process for DTC.	0.10	60.00
10/03/24	JDC	Telephone conference with Mirza Pena regarding Pinnacle Park building sale and Pinnacle Park land sale strategy (.3). Update communications with B. Funk and J. Baumgartner (.2).	0.50	345.00
10/07/24	BLF	Conference with M. Pena regarding pinnacle park land and follow-up correspondence with J. Cornwell.	0.30	180.00
10/08/24	BLF	Correspondence with counsel for DTC tenant (.1); correspondence with CBRE regarding status of diligence items and marketing materials (.1); correspondence with client team regarding potential sale counterparties (.1).	0.30	180.00
10/09/24	BLF	Conference with C. Davis with CBRE regarding status and potentially interested parties.	0.30	180.00
10/09/24	HJV	Research regarding retention, per B. Funk's request.	0.30	64.50
10/14/24	ARP	Work session and correspondence with Z. Schneider regarding draft purchase agreement for DTC.	0.50	250.00
10/14/24	ZAS	Prepared form purchase and sale agreement for the sale of the 5775 DTC Blvd, Greenwood Village, CO property.	0.30	142.50
10/15/24	HJV	Prepare certificate of no objection to bid procedures motion.	0.60	129.00
10/15/24	ARP	Correspond with Z. Schneider regarding draft purchase agreement for DTC.	0.10	50.00
10/15/24	ZAS	Prepared form purchase and sale agreement for the sale of the 5775 DTC Blvd, Greenwood Village, CO property.	1.10	522.50
10/16/24	HJV	Revise bid procedures order, bar date notice, notice of auction, bid procedures and sale, and certificate of no objection (1.6). Prepare redline of bid procedures order (.2).	1.80	387.00
10/17/24	HJV	Work on WIP chart (.9). Revise bid procedure notice (.1). Review upcoming deadlines (.2). Revise, finalize and file bar date notice; email to Stretto team for service (.3).	1.50	322.50
10/17/24	ARP	Review draft purchase and sale agreement for DTC property.	1.00	500.00
10/18/24	ZAS	Prepared the draft purchase and sale agreement form for the Colorado property.	0.50	237.50
10/18/24	HJV	Finalize and file CNO on bid procedures motion (.7). Email to court with courtesy copy regarding same (.1).	0.80	172.00

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10/18/24	BLF	Correspondence with court staff regarding sale hearing (.1); review and finalize bid procedures order, CNO and related papers and coordinate filing (.9)	1.00	600.00
10/18/24	ARP	Review draft purchase and sale agreement for DTC property (1.5); multiple correspondences with Z. Schneider regarding draft purchase and sale agreement for DTC property (1.0); correspond with C. Davis regarding comments and information requests needed for PSA (.4); and correspond with court regarding date for DTC property sale hearing (.1).	3.00	1,500.00
10/21/24	ZAS	Further revised the form Colorado purchase and sale agreement.	0.70	332.50
10/21/24	ARP	Multiple correspondences with M. Pena, A. Jimenez, C. Davis, and Z. Schneider regarding information and responses related to proposed form of sale agreement for DTC (.8); and correspond with J. Gibbs regarding proposed insurance settlement agreement (.2).	1.00	500.00
10/22/24	ZAS	Prepared the revised draft of contract.	0.60	285.00
10/22/24	HJV	Confer with B. Funk regarding bid procedures order (.1). Email to J. Baumgartner requesting cure schedule (.1). Revise sale notice (.3). Finalize and file notice of bid procedures, auction and sale (.3).	0.80	172.00
10/23/24	HJV	Attention to calendaring dates and deadlines pertaining to sale order.	0.20	43.00
10/24/24	ZAS	Prepared the revised Colorado form contract.	2.80	1,330.00
10/24/24	ARP	Work sessions with Z. Schneider regarding purchase and sale agreement for DTC.	0.20	100.00
10/24/24	BLF	Correspondence and conference with J. Vasek regarding Pinnacle Park land sale papers.	0.20	120.00
10/24/24	JPV	Begin drafting bid procedures motion for Pinnacle Park Land (2.7). Telephone conferences with B. Funk regarding same (0.3).	3.00	1,695.00
10/25/24	HJV	Revise cure notice (1.2). Coordinate with Stretto for service of same (.2). Confer with B. Funk regarding cure notice (.2).	1.60	344.00
10/25/24	ARP	Review revised purchase and sale agreement for DTC.	1.00	500.00
10/25/24	JPV	Work on drafting bid procedures motion to Pinnacle Park Land.	3.40	1,921.00
10/25/24	BLF	Conference with J. Vasek regarding Pinnacle Park land sale.	0.20	120.00
10/25/24	BLF	Review and revise cure notice and schedule and conference with H. Valentine regarding same.	0.30	180.00
10/27/24	JPV	Complete draft of Pinnacle sale motion, notices, and order and send to B. Funk for review (2.2).	2.20	1,243.00
10/28/24	ARP	Revise purchase and sale agreement for DTC.	2.00	1,000.00
10/29/24	ARP	Revise purchase and sale agreement for DTC.	2.30	1,150.00
10/31/24	ARP	Work session with Z. Schneider regarding purchase and sale agreement for DTC (.2); and correspond with A. Jimenez and M. Pena regarding status of purchase and sale agreement (.2).	0.40	200.00

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10/31/24	JDC	Coordination with broker and A. Perez regarding DTC draft APA.	0.10	69.00
Total for 08			37.30	17,334.00

Task Code: 11 Plan and Disclosure Statement

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/10/24	BLF	Consider and draft plan classification and consider implementation steps.	2.50	1,500.00
10/10/24	JDC	Telephone conference with Charles Haddad and Mirza Pena regarding plan formulation and related issues (.6). Communications with John Satter of Hilco regarding appraisals and preparation for expert testimony needs (.1); related review of prior communications with John Satter (.1).	0.80	552.00
10/14/24	BLF	Conference with J. Cornwell regarding strategy for call (.1); prepare for and attend conference with client team (.8); consider plan strategy and classification scheme (.8); review precedent cases and plans (1.1).	2.80	1,680.00
10/18/24	JDC	Conference with B. Funk regarding plan formulation and BANA negotiations strategy.	0.10	69.00
10/18/24	HJV	Research regarding motion to conditionally approve disclosure statement.	0.30	64.50
10/20/24	BLF	Consider forms, and begin preparation, of plan term sheet.	1.70	1,020.00
10/21/24	JDC	Conference with B. Funk regarding plan term sheet preparation and coordination in advance of upcoming client call.	0.10	69.00
10/22/24	BLF	Review draft plan model and correspondence regarding same (.3); Conferences with M. Pena, J. Cornwell and A. Perez regarding model assumptions and status of matters (.7); conference with client and advisor teams regarding plan strategy (1.5); follow-up conference with A. Perez and J. Cornwell regarding same (.5); conference with Getzler team and M. Pena regarding plan model assumptions and related analyses (.8).	3.80	2,280.00
10/22/24	JDC	Conference with Mirza Pena and B. Funk regarding plan modeling issues (.1). Continued conference with B. Funk and A. Perez regarding plan term sheet and related strategy (.2).	0.30	207.00
10/24/24	BLF	Review and revise term sheet.	0.60	360.00
10/25/24	BLF	Continue review of term sheet and plan considerations.	1.50	900.00
10/28/24	BLF	Continue considerations for plan.	1.10	660.00
10/28/24	JDC	Conference with B. Funk to discuss plan structure, strategy, and client conference preparations.	0.70	483.00
10/29/24	BLF	Transmit plan termsheet and attend conference with team regarding next steps (1.5); conference with Getzler team regarding cash flow forecast and plan (.9); conference with B. Bass regarding research (.2); work on plan and disclosure statement (1.3).	4.00	2,400.00

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10/29/24	BAB	Confer with B. Funk regarding research assignment about single asset real estate debtors and plan voting (.1).	0.10	38.00
10/29/24	JDC	Analysis of draft plan term sheet from B. Funk (.2). Conference with B. Funk regarding plan terms and strategy (.2). Preliminary review of Ankura appraisals from BANA (.3). Preparation of email to John Satter providing same and motion for stay relief (.1). Conference with John Baumgartner regarding coordinating with Hilco and preparing for valuation and stay relief contest (.2). Conference with Mirza Pena regarding plan financial projections (.2). Conference with John Baumgartner regarding same and general plan and data compilation strategies (.5).	1.70	1,173.00
10/30/24	ARP	Conduct case law research regarding issues related to potential interest rate to be included in plan.	1.50	750.00
10/30/24	BLF	Work on draft plan and disclosure statement (2.1); research regarding lift stay motion and correspondence and conference with J. Cornwell regarding same (1.9).	4.00	2,400.00
10/30/24	BAB	Research regarding Single Asset Real Estate Debtor and voting under Section 1129 (5.2).	5.20	1,976.00
10/30/24	JDC	Coordination with H. Valentine regarding processing and organizing Ankura and Hilco valuations (.1). Detailed review of Ankura valuation rebuttals and comparison against Hilco valuation (3.3). Coordination with John Baumgartner and John Satter regarding same (.1). Various conferences with B. Funk regarding plan formulation issues (.5). Analysis of email from B. Funk to client team regarding same (.1). Follow-up email communications with Charles Haddad and Mirza Pena (.1).	4.20	2,898.00
10/31/24	ARP	Conduct case law research regarding issues related to potential interest rate to be included in plan.	3.40	1,700.00
10/31/24	BAB	Research regarding Single Asset Real Estate Debtor and voting under Section 1129 (3.8).	3.80	1,444.00
10/31/24	JDC	Telephone conference with John Satter regarding initial assessment of Ankura appraisal rebuttal of Bowie property (.2). Telephone conference with John Baumgartner regarding same and various plan modeling and strategy issues in advance of client call (.7). Conference with Mirza Pena regarding plan modeling and preparation issues (.3). Strategy conference with John Baumgartner regarding plan strategy following client conference (.2). Strategy conference with B. Funk regarding plan strategy (.2).	1.60	1,104.00

Total for 11 45.80 25,727.50

Task Code: 13

Business Operations

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Matter Number: 021990.00002
Invoice Number: 10543978
Client: The Aztec Fund Holding, Inc.
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November 20, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/24	ARP	Revise draft settlement agreement regarding insurance proceeds (.3); and draft correspondence to J. Gibbs discussing issues related to indemnification and providing revised settlement agreement (.4).	0.70	350.00
10/07/24	BLF	Correspondence with Bank of America and client team regarding updating KYC information for debtors.	0.20	120.00
10/09/24	BLF	Correspondence with bank of America and client team regarding KYC information for entities without properties.	0.20	120.00
Total for 13			1.10	590.00

Task Code: 14 Reporting/MORs

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/24	BLF	Review draft MORs (.2); conference with J. Baumgartner and A. Perez regarding same (.3).	0.50	300.00
10/01/24	ARP	Phone conference with B. Funk, J. Baumgartner, and B. Kim regarding preparation and status of MORs (.3); and multiple correspondences with J. Baumgartner regarding status of MORs(.2).	0.50	250.00
10/03/24	BLF	Conference with Getzler team regarding MORs (.1); monitor status of preparation and approval of MORs (.6).	0.70	420.00
10/04/24	BLF	Review MORs and coordinate filing with H. Valentine.	0.60	360.00
10/04/24	HJV	Redact supporting documents to monthly operating reports. Finalize and file monthly operating reports for all Aztec entities.	2.40	516.00
10/16/24	HJV	Redact, finalize and file MORs for OME Bowie, OME Mark Center and OME Windward Oaks.	1.10	236.50
10/29/24	HJV	Email to J. Baumgartner requesting September MORs.	0.10	21.50
10/30/24	ARP	Review draft monthly operating reports (1.2); multiple correspondences to M. Pena and client team and J. Baumgartner and Getzler Henrich team regarding issues related to MORs (1.0); and multiple phone conferences and work sessions with M. Pena, J. Baumgartner, and H. Valentine regarding issues related to finalizing the draft MORs (3.0).	5.20	2,600.00
10/30/24	HJV	Redact exhibits to MORs (1.0); finalize and file MORs for all Aztec entities (.5).	1.50	322.50
Total for 14			12.60	5,026.50
Total			209.60	\$108,694.00

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Client: The Aztec Fund Holding, Inc.
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Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	John D. Cornwell	JDC	690.00	33.50	23,115.00
Shareholder	Brenda L. Funk	BLF	600.00	70.20	42,120.00
Shareholder	Julian P. Vasek	JPV	565.00	8.60	4,859.00
Shareholder	Zachary (Zack) A. Schneider	ZAS	475.00	6.00	2,850.00
Associate	Beverly A. Bass	BAB	380.00	19.80	7,524.00
Senior Attorney	Alexander R. Perez	ARP	500.00	45.10	22,550.00
Paralegal	Heather J. Valentine	HJV	215.00	26.40	5,676.00
Total				209.60	\$108,694.00

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/31/24	re Database - Time	0.00
10/30/24	re Print - Line	0.00
10/30/24	re Database - Time	0.00
10/30/24	re Database - Time	0.00
10/08/24	616 Photocopies	123.20
10/08/24	874 Color Copies	437.00
10/03/24	654 Photocopies	130.80
Total		\$691.00

Cost Summary

<u>Description</u>	<u>Amount</u>
Westlaw Research	0.00
Photocopies	254.00
Color Copies	437.00
Total	\$691.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	Case Administration/Noticing	3.90	895.50
02	General Bankruptcy Advice/Opinions	23.70	13,472.50
03	Schedules, SOFA, IDI and 341 Meeting	19.80	12,013.00

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 Client: The Aztec Fund Holding, Inc.
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 November 20, 2024

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04	First and Second Day Matters/Hearings	0.40	200.00
05	Cash Collateral and Postpetition Financing	25.90	15,309.50
06	Stay Matters	6.10	3,666.00
07	Employment and Fee Applications	33.00	14,459.50
08	Asset Disposition	37.30	17,334.00
11	Plan and Disclosure Statement	45.80	25,727.50
13	Business Operations	1.10	590.00
14	Reporting/MORs	12.60	5,026.50
Total		209.60	\$108,694.00

Outstanding Invoices

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Total Balance</u>
09/12/24	10537901	119,453.50	95,635.80	23,817.70
10/22/24	10541619	66,835.76	53,536.86	13,298.90
Total				\$37,116.60



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
Fax 214.855.7584
munsch.com

The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: November 20, 2024
Invoice Number: 10543978
Matter Number: 021990.00002

*For Professional Services through **October 31, 2024***

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	108,694.00
Total Costs	\$	<u>691.00</u>
TOTAL THIS INVOICE	\$	109,385.00
Previous Balance	\$	<u>37,116.60</u>
Total Balance Due	\$	146,501.60

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

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Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: December 31, 2024
Invoice Number: 10546744
Matter Number: 021990.00002

For Professional Services through November 30, 2024

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	207,786.50
Total Costs	\$	<u>28.00</u>
TOTAL THIS INVOICE	\$	207,814.50
Previous Balance	\$	<u>58,855.40</u>
Total Balance Due	\$	266,669.90

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

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Munsch Hardt Kopf & Harr, P.C.
 Matter Number: 021990.00002
 Invoice Number: 10546744
 Client: The Aztec Fund Holding, Inc.
 Matter Description: Chapter 11 Bankruptcy Cases

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 December 31, 2024

Fee Detail

Task Code: 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/24	HJV	Preparation of fileshare link with PCRs and appraisals and email to client regarding same.	0.20	43.00
11/04/24	HJV	Revise CNO for CBRE retention application (.1). Prepare exhibit to CNO (.1). Emails with team regarding same (.1).	0.30	64.50
11/05/24	HJV	Download and organize leases and amendments received from client (.2). Download and organize production received from BANA's counsel (.2).	0.40	86.00
11/07/24	ARP	Review amended matrix (.1); work sessions with H. Valentine regarding issues related to amended matrix and case deadlines (.3); and review certificate of service related to amended schedules and supplemental cure notice (.1).	0.50	250.00
11/07/24	HJV	Download and organize amended schedules and statements (.4). Email to Stretto regarding revising the MSL with new notice parties (.1). Conference with A. Perez regarding deadlines triggered by amended schedules (.2). Attention to calendaring same (.1). Update WIP list (.1). Calls with Stretto and A. Perez regarding amended creditor matrix (.1).	1.10	236.50
11/11/24	HJV	Revise WIP list and circulate to team in preparation for working team meeting (.5). Team working meeting regarding strategy and next steps (1.0). Update WIP list with internal deadlines and notes from meeting and email to team regarding same (.6). Finalize and file master service list (.2).	2.30	494.50
11/12/24	HJV	Download and organize file-stamped October MORs (.1).	0.10	21.50
11/14/24	JPV	Review and organize voluminous outstanding correspondence.	0.30	No Charge
11/14/24	ARP	Multiple correspondences with S. McGuire and A. Blanadet regarding service of Pinnacle Park Land sale pleading and Newmark employment application.	0.40	200.00
11/15/24	ARP	Multiple correspondences with A. Blanadet regarding issues related to noticing of proposed DTC sale order.	0.10	50.00
11/18/24	JPV	Prepare for and participate in weekly WIP conference.	0.60	339.00
11/18/24	HJV	Finalize and file certificate of no objection as to Hilco's employment application (.2). Discussion with B. Funk regarding status of the October invoice (.1). Prepare exhibits for filing with debtors' witness and exhibit list (.3). Finalize and file debtors' witness and exhibit list (.2). Circulate WIP chart in advance of team meeting (.1). Team meeting regarding next steps (.5). Emails and calendar invitation to Charles Haddad and Newmark with instructions for appearing at hearing (.3). Prepare exhibits and binders for hearing (.3). File Gary Carr declaration in support of Newmark application (.2). Prepare exhibits for amended witness and exhibit list (.6). Finalize and file amended witness and exhibit list (.4). Email to R. Saldana with courtesy copy of certificate of no objection (.1).	3.30	709.50

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11/19/24	ARP	Correspond with S. McGuire and A. Blanadet regarding issues related to service of Pinnacle Park Land sale orders.	0.20	100.00
11/19/24	HJV	Update hearing binder with amended witness and exhibit list and exhibits (.1).	0.10	21.50
11/20/24	HJV	Prepare third monthly fee statement (1.3). Address October invoice issues with E. Pinales and team (.6).	1.90	408.50
11/23/24	HJV	Update docket with recent filings (.1).	0.10	21.50
11/25/24	HJV	Attention to calendaring deadline to file plan.	0.10	21.50
11/25/24	ARP	Multiple correspondences with A. Blanadet and S. McGuire regarding service of pleadings and orders related to the sale of the DTC property.	0.20	100.00
11/26/24	HJV	Download documents received from client regarding Bowie and Mark Center (.3). Emails to team regarding same (.1). Prepare notice of master service list (.2).	0.60	129.00
Total for 01			12.80	3,296.50

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/24	BLF	Conference with J. Cornwell, J. Baumgartner and J. Satter (in part) regarding property valuations and other case matters.	1.50	900.00
11/04/24	JDC	Coordination with B. Funk regarding strategy in preparation for client conference (.3). Conference with client and advisor teams to discuss recent developments and strategy (1.1). Telephone conference with Mirza Pena regarding various issues (.3).	1.70	1,173.00
11/04/24	ARP	Case strategy phone conference with J. Cornwell, B. Funk, C. Haddad and client team, J. Baumgartner and Getzler Henrich team, and other professionals regarding terms for plan and term sheet and related issues (.6); and work session with J. Cornwell, B. Funk, and J. Baumgartner regarding interest rate, forecast modeling, and related issues (.6).	1.20	600.00
11/06/24	HJV	Team meeting to discuss strategy and needs in preparation for the bar date and plan confirmation.	0.70	150.50
11/06/24	BLF	WIP conference with A. Perez and H. Valentine.	0.70	420.00
11/06/24	ARP	Case strategy conference with B. Funk and H. Valentine regarding outstanding items and tasks.	0.70	350.00
11/07/24	JDC	Preparation for client conference, including analysis of recent financial modeling and communications with B. Funk (.4). Conference with client and advisor teams regarding investor discussions, plan modeling, and other strategic matters (.9).	1.30	897.00
11/07/24	ARP	Case strategy phone conference with J. Cornwell, B. Funk, C. Haddad and client team, and J. Baumgartner and Getzler Henrich team regarding plan terms and related issues.	1.00	500.00
11/11/24	JPV	WIP conference with J. Cornwell, B. Funk, A. Perez, and H. Valentine.	1.00	565.00

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11/11/24	BLF	Coordinate WIP meeting with team (.3); consider project strategy and attend conference with team (1.0).	1.30	780.00
11/11/24	ARP	Meetings with J. Cornwell, B. Funk, J. Vasek, and H. Valentine regarding outstanding issues and items for sales and plan formulation.	1.00	500.00
11/11/24	JDC	Conference with client team to discuss various updates and strategy (.3). Conference with MHKH team to discuss WIP and general case strategy (.8).	1.10	759.00
11/14/24	ARP	Case strategy phone conference with J. Cornwell, B. Funk, C. Haddad and client team, and other advisors regarding plan formulation and sales processes.	0.70	350.00
11/18/24	BLF	Attend team WIP meeting.	0.50	300.00
11/18/24	JDC	Conference with MHKH team to discuss strategy and work-in-progress coordination.	0.50	345.00
11/18/24	ARP	Strategy work session with J. Cornwell, B. Funk, J. Vasek, and H. Valentine regarding outstanding items and case issues.	0.60	300.00
11/19/24	ARP	Phone conference with J. Cornwell, B. Funk, C. Haddad and client team, J. Baumgartner and Getzler Henrich team, and other professionals regarding plan formulation and property sale issues.	1.20	600.00
11/21/24	ARP	Case strategy phone conference with J. Cornwell, B. Funk, C. Haddad and client team, J. Baumgartner and Getzler Henrich team and other professionals regarding plan formulation and asset sales.	0.70	350.00
11/21/24	BLF	Prepare for and attend client call.	0.70	420.00
11/25/24	ARP	Case strategy phone conference with J. Cornwell, B. Funk, J. Baumgartner, and C. Haddad and client team regarding plan issues.	1.00	500.00
11/27/24	JDC	Conference with team regarding work-in-progress and related strategy.	0.40	276.00
11/27/24	ARP	Work session with J. Cornwell and B. Funk regarding outstanding case issues and tasks.	0.40	200.00
Total for 02			19.90	11,235.50

Task Code: 03 Schedules, SOFA, IDI and 341 Meeting

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/24	ARP	Phone conference with J. Baumgartner regarding amendments to schedules and statements of financial affairs.	0.30	150.00
11/04/24	ARP	Case strategy phone conference with M. Pena and client team and J. Baumgartner and Getzler Henrich team regarding proposed revisions to schedules and statements (.8); case strategy phone conference with J. Baumgartner regarding antenna leases (.7); correspond with A. Macias regarding antenna leases (.2); review antenna leases (.5); and review proposed revisions to schedules and statements (.8).	3.00	1,500.00

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11/05/24	ARP	Phone conference with S. McGuire regarding amendments to schedules and statements of financial affairs (.6); review amended schedules and statements of financial affairs (.9); multiple correspondences with C. Haddad, A. Jimenez, B. Funk, and S. McGuire regarding amended schedules and statements of financial affairs (.8).	2.30	1,150.00
11/06/24	HJV	Attention to binder with complete sets of schedules and amended schedules in preparation of the disclosure statement and plan for B. Funk (2.4). Confer with A. Perez regarding service of amended filings (.2). Finalize amended schedules and statements of financial affairs (1.7).	4.30	924.50
11/06/24	ARP	Draft global notes to amended schedules and statements (1.5); review amended schedules and statements (.8); and multiple correspondences with J. Baumgartner and S. McGuire regarding amended schedules and statements (.5).	2.80	1,400.00
Total for 03			12.70	5,124.50

Task Code: 05 Cash Collateral and Postpetition Financing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/24	JDC	Email communication with BANA counsel regarding approval of budget.	0.10	69.00
Total for 05			0.10	69.00

Task Code: 06 Stay Matters

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/24	JDC	Conference with John Baumgartner, John Satter, and B. Funk to discuss valuation considerations and Ankura rebuttal report (.5). Coordination with team to collect and distribute BANA property condition reports and Ankura valuation rebuttals (.1); preparation of related email to team attaching and describing same (.3).	0.90	621.00
11/04/24	HJV	Email with B. Funk regarding BANA PCRs and appraisals (1.).	0.10	21.50
11/05/24	BLF	Correspondence related to litigation and discovery timing on motion to lift stay.	0.30	180.00
11/05/24	JDC	Analysis of and preparation of response email to Brandon Renken regarding discovery matters (.1). Coordination with J. Alibhai regarding same (.2).	0.30	207.00
11/06/24	BLF	Conference regarding litigation scheduling with Mayer Brown.	0.80	480.00
11/10/24	JDC	Analysis of email from Brandon Renken regarding BANA discovery requests and lift stay motion coordination (.1); related communication with B. Funk and J. Alibhai (.1).	0.20	138.00
11/11/24	JDC	Conference with John Baumgartner and B. Funk to discuss valuation updates and document production.	0.20	138.00

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11/14/24	JDC	Analysis of email from Brandon Renker attaching certain written discovery requests, and preliminary review of attachments (.2). Telephone conference with J. Alibhai regarding litigation help with discovery and evidentiary issues (.5).	0.70	483.00
11/15/24	JDC	Detailed conference with J. Alibhai regarding background, valuation dispute, and discovery scheduling strategy.	0.40	276.00
11/17/24	JNA	Review Bank of America's discovery requests.	0.30	207.00
11/18/24	JMC	Review and analyze discovery requests (.3); conference with Jamil Alibhai regarding same (.1); conference with John Cornwell and Brenda Funk regarding response strategy for discovery responses (.2).	0.60	258.00
11/18/24	ARP	Correspond with J. Vasek regarding valuation reports.	0.20	100.00
11/18/24	JNA	Attend team meeting regarding discovery and case strategy.	0.40	276.00
11/18/24	JPV	Various correspondence with A. Perez regarding issues related to BANA motion for relief from stay (0.3). Work on conducting research related to various issues in connection with preparing response to same (2.4).	2.70	1,525.50
11/19/24	JMC	Begin drafting objections and responses to BANA's discovery requests.	0.90	387.00
11/19/24	JDC	Coordination with J. Alibhai regarding discovery issues.	0.20	138.00
11/19/24	JPV	Ongoing research related to preparing response to motion for relief from stay filed by BANA.	1.50	847.50
11/20/24	JMC	Review and analyze documents relevant and responsive to BANA's discovery requests (.9); continue drafting objections and responses to BANA's discovery requests (1.2).	2.10	903.00
11/20/24	HJV	Extended discussions with J. Christensen regarding discovery responses and relevant production responses (.3). Attention to gathering documents for J. Christenson's review for preparation of discovery responses (.5).	0.80	172.00
11/20/24	JPV	Research standards and application thereof for response to BANA's motion for relief (3.2).	3.20	1,808.00
11/20/24	JDC	Telephone conference with J. Alibhai regarding discovery coordination and status updates (.1). Email communication coordinating with Mayer Brown and MHKH teams to discuss stay motion, discovery scheduling, and related process (.1).	0.20	138.00
11/21/24	JMC	Telephone conference with J. Alibhai regarding Aztec discovery status (.1); coordinate with H. Valentine regarding compilation of documents and discovery status (.2).	0.30	129.00
11/21/24	JPV	Ongoing research related to drafting response to BANA's motion for relief from the automatic stay (3.5).	3.50	1,977.50
11/22/24	ARP	Phone conference with J. Christiansen regarding discovery requests to BANA.	0.20	100.00
11/22/24	JPV	Begin drafting response to BANA motion for relief from stay (4.0). Telephone conference with B. Funk and J. Cornwell regarding same (.2).	4.20	2,373.00

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11/22/24	JMC	Email communications with A. Perez and H. Valentine regarding strategy and next steps for BANA discovery requests (.2); telephone conference with A. Perez regarding strategy and next steps for BANA discovery requests (.2); review and locate Ankura reports in preparation for drafting discovery requests to BANA (.3).	0.70	301.00
11/22/24	JDC	Telephone conference with J. Alibhai regarding document production expectations; coordination with A. Perez and H. Valentine to provide litigation team with client documents.	0.10	69.00
11/24/24	JPV	Complete draft of response to BANA motion for relief from stay and send to Munsch team for review and comment (3.7).	3.70	2,090.50
11/24/24	ARP	Review draft response to BANA's motion for relief from the automatic stay.	0.40	200.00
11/25/24	JPV	Review and revise latest version of response to BANA motion for relief and circulate changes (0.8).	0.80	452.00
11/25/24	ARP	Prepare case law analysis regarding gerrymandering issue.	0.70	350.00
11/25/24	JDC	Analysis of draft objection to stay relief and preparation of revisions to same (1.6). Coordination of final revisions and filing with J. Vasek (.1).	1.70	1,173.00
11/26/24	JPV	Review and provide comments to most recent draft of response to BANA motion for relief (1.0).	1.00	565.00
11/26/24	JDC	Conference with B. Funk regarding upcoming stay hearing and strategy (.1). Conference with J. Alibhai and J. Christensen regarding status and discovery issues (.3).	0.40	276.00
11/26/24	JNA	Attend Teams meeting with client (0.9); confer with J. Cornwell and J. Christensen regarding discovery (0.4); review CapEx summary (0.3).	1.60	1,104.00
11/26/24	BLF	Review and revise response to motion to lift stay.	1.00	600.00
11/26/24	JMC	Attend telephone conference with Hines regarding Bowie and Mark Center properties (1.2); telephone conference with J. Cornwell and J. Alibhai to discuss prioritization for outstanding action items and next steps (.5); draft discovery requests to BANA (.9); continue reviewing documents and drafting responses to BANA's discovery requests (.8).	3.40	1,462.00
11/27/24	JDC	Preparation of email to BANA professionals attaching and describing capex comparison from Ankura rebuttal assumptions, addressing discovery issues, and requesting conference in advance of preliminary stay hearing (.5). Preparation of update email to client team (.3).	0.80	552.00
11/27/24	JMC	Review and analyze Getzler documents in order to compare to CAPEX Excel spreadsheet and prepare chart summarizing same (Mark Center property) (1.9); Review and analyze Getzler documents in order to compare to CAPEX Excel spreadsheet and prepare chart summarizing same (Bowie property) (1.6); revise and finalize discovery requests to BANA (0.5); revise and finalize discovery responses to BANA (0.6).	4.60	1,978.00

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11/27/24	JNA	Review correspondence regarding CapEx issues (.4); review discovery requests and responses (.3); review objection to lift stay motion (.3).	1.00	690.00
Total for 06			47.10	25,746.50

Task Code: 07 Employment and Fee Applications

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/24	ARP	Review first monthly fee statement of Getzler Henrich for form and completeness (.2); phone conference with J. Baumgartner regarding issues related to interim fees (.3).	0.50	250.00
11/04/24	ARP	Correspond with L. Holl Chang regarding CBRE retention application.	0.10	50.00
11/05/24	HJV	File certificate of no objection (.1). Email to R. Saldana regarding same (.1).	0.20	43.00
11/05/24	ARP	Review order approving employment of CBRE (.1); and draft correspondence to C. Davis regarding entry of employment order (.1).	0.20	100.00
11/07/24	ARP	Correspond with J. Baumgartner regarding Getzler Henrich monthly fee statements.	0.10	50.00
11/08/24	JPV	Revise Newmark engagement letter and circulate changes.	0.60	339.00
11/09/24	JPV	Complete drafts of Newmark application and related documents (1.8). Correspondence to client and Newmark regarding same (.1).	1.90	1,073.50
11/11/24	JPV	Follow up correspondence to Newmark regarding employment documents (.1). Telephone conference with Newmark regarding employment application (.2). Review changes to declaration and correspond with B. Funk regarding same (.2). Correspondence with G. Carr regarding same (.1).	0.60	339.00
11/12/24	JPV	Correspondence to B. Funk and A. Perez regarding Newmark declaration (.1). Various additional correspondence regarding same (.4).	0.50	282.50
11/13/24	JPV	Correspondence to Newmark regarding declaration.	0.10	56.50
11/14/24	ARP	Multiple correspondences with B. Funk and J. Vasek regarding Newmark employment application and related issues.	0.50	250.00
11/15/24	JPV	Review witness and exhibit list and notice of hearing (.2). Telephone conference with G. Carr regarding potential need for testimony (.2). Additional correspondence regarding same (.1).	0.50	282.50
11/17/24	JPV	Draft declaration of Gary Carr (.3). Revise W&E list (.2). Correspondence to B. Funk and A. Perez regarding same (.1).	0.60	339.00
11/17/24	ARP	Revise supplemental declaration for Gary Carr in support of Newmark retention application.	0.40	200.00

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11/18/24	JPV	Correspondence to G. Carr regarding supplemental declaration (.1). Telephone conference with A. Perez regarding preparation (.2). Telephone conference with G. Carr for hearing (.2). Correspondence regarding G. Carr regarding hearing instructions (.1). Additional correspondence regarding Newmark regarding upcoming hearing (.2).	0.80	452.00
11/18/24	ARP	Multiple work sessions and correspondences with J. Vasek and B. Funk regarding issues related to Newmark employment application (1.7); and review certificate of no objection in connection with Hilco employment application (.2).	1.90	950.00
11/19/24	ARP	Phone conference with J. Vasek and R. Holman regarding issues related to Newmark retention application (.1); and review entered Newmark retention order (.1).	0.20	100.00
11/19/24	BLF	Review and revise monthly fee statement.	0.40	240.00
11/23/24	ARP	Revise Munsch Hardt's third monthly fee statement (.3); draft correspondences to J. Whitworth, T. Kiriakos, and other notice parties and M. Pena regarding Munsch Hardt's third monthly fee statement (.2); and draft Munsch Hardt's first interim fee application (.5).	1.00	500.00
11/23/24	HJV	Attention to calendaring objection deadline regarding October fee statement (.1).	0.10	21.50
11/24/24	JPV	Correspondence from Newmark regarding listing agreement (.1). Correspondence to C. Haddad regarding same (.1). Additional correspondence regarding same (.1).	0.30	169.50
11/24/24	ARP	Draft Munsch Hardt's first interim fee application.	1.00	500.00
11/25/24	ARP	Draft Munsch Hardt's first interim fee application.	3.20	1,600.00
11/26/24	HJV	Confer with E. Pinales regarding payments received (.2). Review invoices and gather information needed for interim fee application (.5). Draft order on interim fee application (.3). Redact invoices (.3).	1.30	279.50
11/26/24	ARP	Revise Munsch Hardt's first interim fee application (2.8); and revise proposed order on Munsch Hardt's first interim fee application (.2).	3.00	1,500.00
11/27/24	JDC	Review draft interim fee application and confer with A. Perez regarding finalizing and filing same.	0.30	207.00
11/27/24	ARP	Prepare final revisions to Munsch Hardt's first interim fee application.	2.50	1,250.00
11/29/24	ARP	Review first interim fee application for Getzler Henrich.	0.50	250.00
Total for 07			23.30	11,674.50

Task Code: 08

Asset Disposition

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10546744

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/24	JDC	Attention to various email communications with Mirza Pena and A. Perez regarding DTC marketing status.	0.20	138.00
11/01/24	BLF	Conference with J. Vasek and A. Perez regarding sales processes for DTC and Pinnacle Park Land.	1.00	600.00
11/01/24	JPV	Prepare for and participate in Zoom conference with A. Perez and B. Funk regarding sale issues.	1.00	565.00
11/01/24	ARP	Case strategy work session with B. Funk and J. Vasek regarding property sale issues (1.0); work session regarding revisions to the purchase and sale agreement for DTC (.6); correspond with R. Saldana responding regarding inquiry about sale hearing (.1); phone conference with M. Pena regarding issues related to DTC sale (.2); correspond with J. Ginley regarding title report for DTC (.2); correspond with M. Pena and C. Davis regarding issues and deliverables related to sale of DTC (.9); and correspond with Z. Schneider regarding purchase and sale agreement for DTC (.2).	3.20	1,600.00
11/02/24	JDC	Attention to Pinnacle Park Land listing agreement from Charles Haddad.	0.10	69.00
11/02/24	ZAS	Work session with Alex Perez regarding draft Colorado PSA and revisions to the same.	3.40	1,870.00
11/02/24	ARP	Work session with Z. Schneider regarding revisions to purchase and sale agreement for DTC.	3.40	1,700.00
11/03/24	ARP	Review and revise purchase and sale agreement for DTC (1.6); and correspond with M. Pena regarding purchase and sale agreement for DTC (.1).	1.70	850.00
11/04/24	HJV	Confer with A. Perez regarding subleases for DTC 5775 (.1). Review client documents for subleases (.2). Review schedule G for reference to subleases (.1).	0.40	86.00
11/04/24	ARP	Multiple correspondences with C. Davis, C. Haddad, and M. Pena regarding final revisions to purchase and sale agreement for DTC (.8); prepare final revisions to purchase and sale agreement for DTC (1.4); and correspond with J. Ginley regarding title commitment (.1).	2.30	1,150.00
11/04/24	JPV	Review Newark engagement letter and correspond with B. Funk regarding same.	0.60	339.00
11/05/24	BLF	Correspondence regarding cure notice and other matters related to DTC.	0.30	180.00
11/06/24	ARP	Case strategy phone conference with J. Vasek regarding proposed sale order for DTC (.3); and draft correspondence to J. Vasek regarding proposed sale order for DTC (.3).	0.60	300.00
11/06/24	JPV	Telephone conference with A. Perez regarding sale order and related issues (.2). Update Pinnacle Park Land sale documents and circulate to client (1.6). Various correspondence with B. Funk regarding same (.2).	2.00	1,130.00
11/07/24	JPV	Correspondence with Newmark (.1). Zoom conference with Newmark regarding Pinnacle Park Land sale timeline and related issues (.3). Revisions to bid procedures (.5).	0.90	508.50

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11/08/24	BLF	Review proposed time line for PPL sale and correspondence with team regarding filing pleadings.	0.40	240.00
11/08/24	JDC	Conference with A. Perez regarding sale updates and strategy and general research questions.	0.30	207.00
11/08/24	ARP	Correspond with L. Holl Chang regarding purchase and sale agreement for DTC. (.1); and correspond with R. Saldana regarding hearing time for sale pleadings (.1).	0.20	100.00
11/08/24	JPV	Revisions to Pinnacle Park Land sale motion and related documents (2.2). Various correspondence regarding same (.3).	2.50	1,412.50
11/09/24	JPV	Revisions to Pinnacle bid procedures motion and related documents (.3). Draft sale order for DTC sale (1.7).	2.00	1,130.00
11/11/24	JPV	Revisions to Pinnacle Park documents based on change in timeline due to Court's availability (.3). Correspondence to B. Funk and A. Perez regarding same (.1). Follow up correspondence to client regarding same (.1).	0.50	282.50
11/11/24	HJV	Coordinate with Veritext regarding court reporter needed for auction.	0.20	43.00
11/11/24	BLF	Correspondence regarding hearing schedule for Pinnacle Park Land motion (.2); Review marketing report for DTC and correspondence regarding same (.2).	0.40	240.00
11/11/24	ARP	Conduct legal research regarding treatment of leases during 363 asset sales (2.0); correspond with J. Cruciani providing markup of proposed language for DTC sale order (.5); prepare revisions to proposed form of DTC sale order (.5); correspond with L. Holl Chang regarding sales process for DTC (.2); multiple correspondences with C. Davis regarding sales process for DTC (.3); review marketing update for DTC from CBRE (.2); and correspond with R. Saldana regarding hearing date for Pinnacle Park land bid procedure motion (.2).	3.90	1,950.00
11/12/24	JPV	Correspondence with A. Perez regarding Pinnacle Park Land sale documents (.1). Telephone conference with B. Funk regarding same (.4). Revisions to same (1.8). Correspondence with B. Funk regarding same (.2).	2.50	1,412.50
11/12/24	HJV	Communications with court reporter regarding turnaround time for auction transcript (.1).	0.10	21.50
11/12/24	BLF	Review and revise bid procedures motion for Pinnacle Park Land and correspondence with team regarding same (.6); correspondence with team regarding status of DTC sale and bid deadline (.2).	0.80	480.00
11/12/24	ARP	Analysis of issues regarding extension of bid deadlines for DTC (.8); correspond with C. Haddad regarding extension of bid deadlines for DTC (.2); correspond with R. Saldana regarding hearing dates for Pinnacle Park land sale pleadings (.2); and work session regarding final revisions and comments to Pinnacle Park Land sale motion and documents (2.6).	3.80	1,900.00

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11/12/24	JDC	Various communications with MHKH team and Charles Haddad regarding sale process status and strategy for each of DTC and Pinnacle Park Land (.6). Related review of bid procedures order for DTC to determine auction and process flexibility in light of buyer inquiries (.3).	0.90	621.00
11/13/24	JPV	Review changes to Pinnacle Park Land bid procedures motion from B. Funk (.2). Correspondence to B. Funk (.1). Additional correspondence with B. Funk and A. Perez regarding finalizing and filing (.3). Additional correspondence with H. Valentine, B. Funk, and A. Perez regarding same (.2).	0.80	452.00
11/13/24	HJV	Confer with A. Perez regarding bid procedures motion and employment application (.2). Finalize bid procedures motion, application to employ Newmark and exhibits (1.9).	2.10	451.50
11/13/24	BLF	Conferences and correspondence regarding potential extension of bid deadline for DTC.	0.60	360.00
11/13/24	ARP	Phone conference with C. Davis regarding sales process for DTC (.4); phone conference with L. Holl Chang regarding sales process for DTC (.1); multiple correspondences with M. Pena and C. Davis regarding sales process for DTC (.4); revise Pinnacle Park Land sale documents (1.0); review Newmark employment application documents (.4); work session with H. Valentine regarding final review and filing of Pinnacle Park Land sale documents and Newmark employment application (1.5); multiple correspondences with J. Vasek, B. Funk regarding Pinnacle Park Land sale documents (1.0); and correspond with R. Saldana regarding emergency filings related to Pinnacle Park Land sale and Newmark employment application (.2).	5.00	2,500.00
11/14/24	HJV	Confer with A. Perez regarding pending deadlines related to bidding deadline and necessary notices that need to be drafted (.2). Prepare draft notices (.5).	0.70	150.50
11/14/24	ARP	Phone conference with M. Pena regarding issues related to DTC sales process (.7); multiple phone conferences with C. Davis regarding DTC sales process (1.0); correspond with L. Holl Chang regarding non-extension of DTC bid deadline (.2); correspond with W. Malone regarding vendor matters in advance of sale of DTC (1.5); multiple correspondences with B. Funk, J. Baumgartner, and M. Pena regarding issues related to DTC sale (1.2); and work session with H. Valentine regarding preparation of DTC sale related notices (.5).	5.10	2,550.00
11/15/24	ARP	Multiple phone conferences with C. Davis, B. Funk, and M. Pena regarding issues related to DTC sales process (1.2); review proposed bids for DTC (1.3); phone conference with B. Funk and L. Holl Chang regarding DTC sales process (.1); draft notice of proposed DTC sale order (.5); revise proposed DTC sale order (.6); review information from information technology group in preparation for hosting potential auction (.4); multiple correspondences with R. Saldana regarding scheduling of hearing on Pinnacle Park Land sale (.3); correspond with C. Haddad regarding hearing on Pinnacle Park Land sale pleadings (.1); and revise notice of hearing on	4.70	2,350.00

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		Pinnacle Park Land sale pleadings (.2).		
11/15/24	HJV	Emails with A. Perez regarding latest lease amendment between Fiserv and DTC (.1). Review leases and documentation provided by client (.2). Email to team regarding auction going forward (.1). Email to Veritext regarding status of auction (.1). Confer with A. Perez regarding supplemental cure notice (.1). Preparation of notice of emergency hearing (.5). Preparation of the witness and exhibit list (.4). Confer with A. Perez regarding bidding deadline today (.2). Revise witness and exhibit list (.1). Emails to J. Vasek regarding witness and exhibit list and notice of hearing (.2). Review bidding procedures motion and order to determine all deadlines are being met (.2). Finalize and file notice of emergency hearing (.1). Review email from court clerk with new time of 10:00 a.m. (.1). Revise, finalize and file amended notice of emergency hearing (.2). Attention to calendaring same (.1). Finalize and file notice of filing DTC sale order (.3).	3.00	645.00
11/15/24	JPV	Various correspondence with Court and A. Perez regarding hearing date and witness and exhibit list (.2).	0.20	113.00
11/15/24	BLF	Attend to matters related to bid deadline including conferences with broker, A. Perez, and M. Pena (1.3); review bids and consider strategy with respect to auction (1.6).	2.90	1,740.00
11/15/24	ZAS	Reviewed the BANA comments to the draft PSA and prepared proposed responses to the same.	1.30	715.00
11/15/24	JDC	Email communications with team and BANA counsel regarding DTC auction status, BANA participation, and bids received (.2). Telephone conference with B. Funk regarding same and go-forward strategy (.2). Preliminary review of bids (.2).	0.60	414.00
11/17/24	ARP	Review correspondence from Z. Schneider regarding BANA markup to purchase and sale agreement for DTC.	0.30	150.00
11/17/24	ZAS	Reviewed and analyzed the BANA revisions to the purchase and sale agreement (.9); and prepared comments to the same (.9).	1.80	990.00
11/18/24	BLF	Correspondence and conferences with team and BANA regarding DTC sale progress.	0.50	300.00
11/18/24	JDC	Various email communications regarding DTC sale progress.	0.20	138.00
11/18/24	ARP	Multiple work sessions and correspondences with J. Vasek regarding case strategy and preparation for hearing on Pinnacle Park Land sale procedures (2.1); revise witness and exhibit list for hearing on Pinnacle Park Land sale pleadings (.3); review declaration of C. Haddad in support of Pinnacle Park Land sales process (.3); multiple correspondences with C. Haddad regarding hearing on and support for Pinnacle Park Land sales process (.3); work sessions with B. Funk and C. Davis regarding revised bids for DTC (.4).	3.40	1,700.00
11/18/24	JPV	Draft declaration of C. Haddad in support of bid procedures motion (.4). Correspondence to B. Funk and A. Perez regarding same (.1). Various correspondence regarding	1.90	1,073.50

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		witness and exhibit list (.3). Telephone conference with A. Perez regarding supplemental declaration (.2). Correspondence regarding same (.1). Correspondence with H. Valentine regarding witness and exhibit list (.1). Review amended witness and exhibit list and correspond with H. Valentine regarding same (.2). Prepare for hearing (.5).		
11/19/24	JDC	Analysis of offer updates from CBRE regarding DTC sale process.	0.20	138.00
11/19/24	ARP	Attend emergency hearing on Pinnacle Park Land sale pleadings (.5); multiple work sessions and correspondences regarding continued analysis of bids for DTC and coordination with C. Davis, B. Funk, C. Haddad, and L. Holl Chang regarding same (4.8); revise purchase and sale agreement for DTC based on comments from potential bidder (.8); and revise notice of Pinnacle Park Land bidding procedures (.6)	6.70	3,350.00
11/19/24	JPV	Zoom conference with Newmark to prepare for hearing (.3). Prepare for hearing (2.6). Appear at hearing on bid procedures motion and application to employ Newmark (.5).	3.40	1,921.00
11/19/24	BLF	Conference with A. Perez on Pinnacle Park sale matters (.1); conferences and correspondence with team and T. Million on DTC process (.9).	1.00	600.00
11/19/24	HJV	Call with Newmark regarding hearing preparation (.2). Revise sale notice and stalking horse notice (.5). Conferences with A. Perez regarding possible DTC sale auction and next steps (.4). Emails with court reporter regarding auction and zoom needs and capabilities (.4).	1.40	301.00
11/20/24	ARP	Multiple work sessions with B. Funk and H. Valentine regarding DTC auction logistics (1.2); prepare draft notice language to each DTC qualified bidder (.4); draft notice to contract counterparties in connection with the DTC sale process (1.5); and correspond with G. Carr and R. Holman regarding Pinnacle Park Land sales process (.4).	3.50	1,750.00
11/20/24	HJV	File notice of notice of bid procedures as to Pinnacle Park Land (.2). Update docket with recent filings (.3). Extended discussions with A. Perez regarding go forward strategy and next steps regarding the DTC auction (.8). Attention to technical arrangements for auction (1.4). Communications with court reporter regarding go forward strategy regarding auction (.3). Prepare third monthly fee statement (1.3). Revise notice to counterparties regarding DTC auction/sale (.5). Research DTC property's tax appraisal for years 2023-24 (.5). Emails with team regarding auction and outstanding issues (.2). Gather documents for A. Perez and B. Funk in preparation for tomorrow's auction (.3).	4.50	967.50
11/20/24	JPV	Meet with B. Funk and participate in preparations for Zoom auction for DTC.	0.40	226.00

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11/20/24	JDC	Conference with B. Funk and A. Perez regarding DTC auction status and other strategic matters (.2). Attention to various email communications from Mayer Brown regarding DTC sale (.2). Analysis of bidder updates from CBRE (.1). Coordination of strategy with B. Funk (.2).	0.70	483.00
11/21/24	ARP	Multiple correspondences with B. Winn, H. Valentine, and B. Funk in preparation for auction of DTC property (.8); attend virtual auction of DTC property (1.7); draft notice of successful and back up bidder and contracts for assignment (1.2); multiple correspondences with C. Davis and L. Holl Chang regarding issues related to DTC property sale (.7).	4.40	2,200.00
11/21/24	ZAS	Reviewed the transfer tax provisions for Colorado.	0.30	165.00
11/21/24	HJV	Emails with B. Funk and B. Winn regarding auction preparation (.7). Calculate cure costs and email to B. Funk (.2). Attention to auction details and confirmation of court reporter (.3). Search for service emails for contract counter parties (.7). Emails with Stretto requesting same (.3). Email zoom link info to all parties (.2). Calls and emails with team regarding auction preparation (.3). Gather all service contracts related to DTC (.6). Emails with team regarding auction (.5). Monitor auction (1.0). Prepare notice of successful bidder (1.0). Prepare witness and exhibit list for sale hearing (.7). Prepare declaration (1.2). Revise notice of successful bidder (.4). Phone calls with A. Perez regarding notices (.3). Email to Stretto regarding service of notice (.1).	8.50	1,827.50
11/21/24	JDC	Various communications with B. Funk regarding CBRE communications, selection of starting bid, and general auction strategy (.4). Confer with B. Funk and A. Perez during, and participate in, auction of DTC property (1.7). Telephone conference with C. Haddad regarding auction results (.2).	2.30	1,587.00
11/21/24	BLF	Conference with A. Perez regarding auction strategy and open items (.6); prepare for and attend auction (3.5).	4.10	2,460.00
11/22/24	ARP	Draft declaration for C. Haddad in support of sale of DTC property (1.5); draft correspondence to C. Haddad regarding declaration in support of sale of DTC property (.1); draft declaration of Campbell Davis in support of sale of DTC property (2.0); multiple correspondences with C. Davis, A. Ward, J. Cruciani, L. Holl Chang regarding issues and follow up related to sale of DTC property (1.0); review correspondence from K. Bartlett regarding DTC cure related issue (.3); and revise witness and exhibit list for sale hearing for DTC property (.3).	5.20	2,600.00
11/22/24	JPV	Review and revise declaration of C. Haddad in support of DTC sale.	0.60	339.00
11/22/24	JDC	Coordination with Charles Haddad regarding sale hearing participation.	0.10	69.00

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11/23/24	ARP	Review BANA's proposed revisions to DTC sale order (.8); draft correspondence to A. Ward and L. Holl Chang regarding draft DTC sale order (.3); revise draft declaration of Campbell Davis in support of DTC sale (.8); draft correspondence to C. Davis regarding draft declaration in support of DTC sale (.1); revise draft purchase and sale agreement for DTC property (.8); and draft correspondence to A. Ward regarding draft DTC purchase and sale agreement (.1).	2.90	1,450.00
11/24/24	JPV	Correspondence with J. Turner regarding potential taxing authority language.	0.10	56.50
11/24/24	ZAS	Prepared comments regarding the purchaser's request that BANA assurances that it will release its lien.	0.20	110.00
11/24/24	ARP	Revise purchase and sale agreement for DTC property (.4); multiple correspondences with C. Davis regarding draft declaration in support of DTC sale (.2); multiple correspondences with Z. Schneider regarding issues related to purchase and sale agreement for DTC property (.3); correspond with A. Ward, T. Kiriakos, and L. Holl Chang regarding proposed revision to Purchase and sale agreement for DTC property (.2); and work session in preparation for sale hearing on DTC property (.5).	1.60	800.00
11/25/24	HJV	Review and finalize witness and exhibit list and prepare exhibits for filing; finalize and file same (.8). Prepare binders for sale hearing (.3). Draft notice of proposed sale order and redline (.6). Prepare redlines of sale orders (.4). Finalize same (.1).	2.20	473.00
11/25/24	HJV	Confer with B. Winn regarding logistics of potential auction of Pinnacle Park Land.	0.20	43.00
11/25/24	ARP	Prepare final revisions to declaration of Campbell Davis (.5); prepare final revisions to declaration of Charles Haddad (.2); work session in preparation for sale hearing on DTC property (.8); attend hearing on sale of DTC property (.7); multiple correspondences with A. Ward and L. Holl Chang regarding revisions to the purchase and sale agreement for the DTC property and proposed sale order (2.1); review notice of redline of proposed sale order for DTC property (.4); correspond with C. Davis regarding entry of DTC sale order (.2); and multiple correspondences with A. Ward regarding entry of DTC sale order and execution of the purchase and sale agreement for DTC (.5).	5.40	2,700.00
11/25/24	BLF	Conference with A. Perez regarding hearing preparation and strategy (.4); prepare for and attend hearing (.3).	0.70	420.00
11/25/24	JDC	Attendance of DTC sale hearing.	1.00	690.00
11/26/24	HJV	Confer with A. Perez regarding finalizing PSA (.1). Finalize PSA and send via docusign to Charles Haddad and Andy Ward for signature (.4). Compile executed final PSA and email to A. Perez (.2).	0.70	150.50

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11/26/24	ARP	Work session regarding preparation and coordination of closing of DTC property (1.0); phone conference with A. Ward regarding process and next steps related to closing on DTC property (.1); and multiple correspondences with A. Ward, L. Holl Chang, and C. Davis regarding issues related to closing of DTC property (0.6).	1.70	850.00
11/27/24	ZAS	Review the outstanding items needed for closing with A. Perez and prepared for closing (0.6). Prepare a draft amendment and assignment of contract (1.0).	1.60	880.00
11/27/24	ARP	Work session with Z. Schneider regarding deliverables related to closing of sale of DTC property (.6); phone conference with A. Ward regarding issues related to timing and closing of sale of DTC property (.1); review deliverables circulated by counsel for BANA for DTC property closing (.5); draft correspondence to M. O'Connor regarding DTC property closing (.1); and multiple correspondences with Z. Schneider, C. Davis, A. Ward, and C. Haddad regarding issues related to timing and closing of sale of DTC property (1.0).	2.30	1,150.00
11/29/24	ARP	Draft correspondence to A. Ward regarding closing date for DTC property sale (.1); draft correspondence to M. O'Connor regarding closing date for DTC property sale (.1); and draft correspondence to M. Pena and J. Baumgartner regarding items and information needed for DTC property closing (.4).	0.60	300.00
Total for 08			143.20	68,975.00

Task Code: 09 Leases and Contracts

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/15/24	ARP	Review Fiserv lease (.5); phone conferences with M. Pena, A. Jimenez, and B. Funk regarding issues related to Fiserv lease (.7); and multiple correspondences with B. Funk providing analysis of potential cure issues related to Fiserv lease (.8).	2.00	1,000.00
11/18/24	ARP	Review Intellicenter leases for issues related to potential claim.	0.40	200.00
Total for 09			2.40	1,200.00

Task Code: 10 Bar Date and Claims Administration

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/05/24	HJV	Revise cure notice to include new entities referenced in amended scheduled G (.4). Confer with A. Perez regarding service on new entities referenced amended scheduled G (.2).	0.60	129.00
11/06/24	BLF	Conference and correspondence with counsel for creditor regarding potential extension of bar date (.2); review and revise draft stipulation and correspondence with counsel regarding same (.3).	0.50	300.00

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11/06/24	ARP	Draft stipulation with Nexbank regarding bar date (.7); and correspond with B. Funk regarding same (.1).	0.80	400.00
11/07/24	BLF	Review draft stipulation and coordinate filing.	0.40	240.00
11/07/24	HJV	Finalize and file stipulation between NexBank and debtors (.2). Attention to calendaring bar date for NexBank (.1).	0.30	64.50
11/08/24	ARP	Correspond with S. McGuire regarding provision of claims analysis.	0.20	100.00
11/13/24	BLF	Conference with counsel for NexBank regarding claim filing.	0.20	120.00
11/13/24	ARP	Phone conference with J. Rudd and B. Funk regarding bar date issues.	0.20	100.00
11/15/24	ARP	Multiple correspondences with S. McGuire regarding provision of claims analysis.	0.20	100.00
Total for 10			3.40	1,553.50

Task Code: 11 Plan and Disclosure Statement

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/24	JDC	Communications with J. Baumgartner regarding plan modeling updates and related client communications (.2). Related telephone conference with Mirza Pena (.2).	0.40	276.00
11/01/24	ARP	Case strategy work session with J. Cornwell regarding plan formulation and proof issues (1.2); and case strategy work session with B. Bass regarding research issues for plan formulation (.4).	1.60	800.00
11/01/24	BAB	Research regarding a single asset real estate debtor and voting under Section 1129 (3.1).	3.10	1,178.00
11/02/24	ARP	Conduct case law research regarding plan issues.	0.60	300.00
11/04/24	BLF	Conference with J. Cornwell in preparation for client call (.2); attend client call regarding case strategy (1.3).	1.50	900.00
11/04/24	BAB	Conduct research regarding the classification of claims and gerrymandering.	2.30	874.00
11/05/24	BLF	Conference call with client and Getzler team regarding business plan (1.1); conferences with Getzler, J. Cornwell and client team regarding potential equity raise (.9); review proposed model and correspondence regarding same (.8).	2.80	1,680.00
11/05/24	JDC	Analysis of various communications with MHKH and Getzler team regarding plan modeling updates (.2). Related strategy conference with B. Funk (.3).	0.50	345.00
11/05/24	ARP	Conduct case law review regarding legal standards and requirements related to claims classification.	5.20	2,600.00
11/06/24	JDC	Detailed update and strategy conferences with B. Funk principally regarding plan structure, financial modeling, and valuation considerations.	1.40	966.00

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11/06/24	BLF	Consider options and draft, review and revise plan and disclosure statement (3.3); conferences with J. Cornwell regarding plan and discovery issues (1.4); conferences and correspondence with J. Baumgartner and team regarding projections (.3).	5.20	3,120.00
11/06/24	ARP	Conduct case law review regarding legal standards and requirements related to claims classification.	3.00	1,500.00
11/07/24	BLF	Conference with J. Cornwell regarding strategy for client call (.2); conference with J. Cornwell and Getzler team regarding model (.5); conference with client and advisor teams (1.1); consider forms of restructuring support agreement for new investment (.7).	2.50	1,500.00
11/07/24	ARP	Prepare analysis of case law research regarding plan classification issues.	4.70	2,350.00
11/07/24	HJV	Continue preparation of binder of amended schedules and statements for B. Funk to aid in preparation of plan.	0.30	64.50
11/08/24	BLF	Conference with J. Baumgartner regarding plan formulation and status.	0.30	180.00
11/08/24	JDC	Detailed conference with B. Funk to discuss plan formulation and related strategy.	0.80	552.00
11/08/24	ARP	Case strategy work session with J. Cornwell regarding plan terms and confirmation issues.	1.00	500.00
11/08/24	ARP	Case law research and analysis regarding plan classification and related issues.	2.80	1,400.00
11/11/24	BLF	Draft, review, and revise restructuring support agreement (1.5). Strategy conference with client team (.2); follow-up conference with J. Cornwell and J. Baumgartner (.3); review information related to Fenicia investment and consider strategy with respect to same (.5); conference and correspondence with A. Perez and J. Baumgartner regarding same (.4).	2.90	1,740.00
11/11/24	ARP	Conduct case law research regarding issues related to classification of claims (1.0); and case strategy meeting with J. Cornwell and B. Funk regarding plan formulation issues, including related discussions with J. Baumgartner and C. Haddad (1.6).	2.60	1,300.00
11/11/24	JDC	Conference with J. Baumgartner and B. Funk to discuss plan modeling.	0.30	207.00
11/12/24	ARP	Conduct legal research regarding plan requirements.	1.20	600.00
11/12/24	BLF	Correspondence and conferences with client team regarding status of various plan related matters (.4); update conference with J. Cornwell (.1); review and revise draft restructuring support agreement (1.5); review and revise draft plan (3.5).	5.50	3,300.00
11/12/24	JDC	Communications with B. Funk and Charles Haddad regarding equity raise and preparation of related plan support agreements.	0.20	138.00
11/13/24	BLF	Review and revise term sheet and plan.	3.70	2,220.00

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11/13/24	JDC	Various email communications with B. Funk and John Baumgartner regarding plan modeling and strategy (.3). Email communication with Charles Haddad confirming equity raise (.1).	0.40	276.00
11/14/24	BLF	Continue to review and revise plan, term sheet, and disclosure statement.	2.30	1,380.00
11/14/24	JDC	Conference with B. Funk regarding various plan formulation, modeling, and related updates; discussed strategy for communicating same to BANA counsel (.4). Conference with client and advisor teams regarding plan formulation and related updates (.8).	1.20	828.00
11/15/24	BLF	Conferences with Getzler, Hilco, and MHKH teams regarding status of plan model and valuations and review materials.	2.10	1,260.00
11/15/24	JDC	Conference with John Baumgartner and B. Funk to discuss Capex and TI cost issues (.5). Related telephone conference with John Baumgartner regarding strategy (.2). Conference with Getzler team and B. Funk to discuss plan modeling (.9).	1.60	1,104.00
11/18/24	BLF	Multiple conferences with J. Cornwell, C. Haddad and J. Baumgartner regarding Plan and consider strategy (4.1); prepare for and attend conference with Bank of America regarding plan structure (1.0); review and revise draft plan and disclosure statement (1.5).	6.60	3,960.00
11/18/24	JDC	Conference with B. Funk, John Baumgartner, and Charles Haddad regarding plan formulation, modeling, and value issues (1.8). Continued related conference with B. Funk and John Baumgartner (.9). Conference with Mayor Brown team regarding plan and general case status (.7).	3.40	2,346.00
11/19/24	JDC	Conference with client and advisor team to discuss updates, status, and strategy.	1.20	828.00
11/19/24	BLF	Conferences with J. Baumgartner and M. Pena on plan projections and capex schedule information (.5); continue work on draft plan and disclosure statement and conference with C. Haddad regarding same (2.5); attend client call on plan and other open items (1.2).	4.20	2,520.00
11/20/24	BLF	Review and revise disclosure statement (2); conferences with Getzler and MHKH regarding models (1); call with Mayer Brown team regarding updates (.5)	3.50	2,100.00
11/20/24	JDC	Conference with Getzler team regarding financial modeling, and analysis during conference of updated 2-year and capex models (.5). Follow-up telephone conference with B. Funk regarding same (.2). Meeting with B. Funk regarding plan formulation strategy and timing issues (.3).	1.00	690.00
11/21/24	ARP	Work session with B. Bass regarding research related to solicitation issue.	0.40	200.00
11/21/24	BAB	Conduct research regarding Debtor's solicitation period.	2.90	1,102.00
11/21/24	JDC	Conference with C. Speer regarding tax issues relating to plan formulation (.4). Conference with B. Funk and Getzler team regarding financial modeling (.6).	1.00	690.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10546744

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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December 31, 2024

11/21/24	BLF	Attend conference with Mayer Brown on valuation and other open issues (.5); catch- up conference with J. Baumgartner and J. Cornwell on plan issues (.5).	1.00	600.00
11/22/24	ARP	Correspond with B. Bass regarding research findings on solicitation issue.	0.40	200.00
11/22/24	BAB	Conduct research regarding Debtor's solicitation period.	1.70	646.00
11/22/24	JDC	Email communication with Charles Haddad providing update regarding equity raise (.1). Follow-up telephone conference with C. Speer and B. Funk regarding NOL and other tax considerations relative to plan formulation (.4). Conference with B. Funk regarding plan strategy (.4).	0.90	621.00
11/22/24	BLF	Conferences with C. Speer and J. Cornwell regarding plan.	0.50	300.00
11/23/24	ARP	Correspond with B. Funk regarding issues related to insolvency analysis.	0.40	200.00
11/23/24	JDC	Analysis of revised 2-year projection and liquidation calculations from Getzler (.3). Conference with Getzler team and B. Funk to discuss same (1.6).	1.90	1,311.00
11/23/24	BLF	Review client tax information for assistance in evaluating plan options (.3); perform research and correspondence with C. Speer regarding same (.5); attend conference with J. Baumgartner and J. Cornwell regarding liquidation analysis, review same and correspondence regarding same (1.8).	2.60	1,560.00
11/24/24	JDC	Conference with B. Funk regarding plan structure and modeling strategy (.5). Conference with Getzler team and B. Funk regarding plan modeling and liquidation analysis (4.4).	4.90	3,381.00
11/24/24	BLF	Prepare for and attend conference with J. Cornwell and Getzler team regarding preparation of liquidation analysis (3.6); continue consideration of same and correspondence with J. Baumgartner (.7).	4.30	2,580.00
11/25/24	ARP	Review research and analysis circulated by B. Bass regarding solicitation issue.	0.30	150.00
11/25/24	BLF	Conference with Hilco team regarding revised valuations (1.3); conference with J. Cornwell regarding strategy (.3); follow-up research regarding feasibility (.8); conference with J. Cornwell and J. Baumgartner regarding strategy (.3); prepare for and attend client call regarding plan options (1.4); follow-up conference with J. Baumgartner regarding same (.5); perform research regarding plan classification and correspondence with A. Perez regarding same (1.1).	5.70	3,420.00
11/25/24	BAB	Conduct research regarding Debtor's solicitation period.	1.30	494.00
11/25/24	JDC	Conference with B. Funk regarding financial modeling and plan formulation (.3). Conference with John Satter and Todd Haney regarding valuation revisions (.8). Continued conference regarding valuation revisions and plan strategy with John Baumgartner and B. Funk (.3). Conference with Charles Haddad, Mirza Pena, and B. Funk regarding recent financial projections and plan strategy (1.7). Conference with John Baumgartner and B. Funk regarding capex and plan strategy (.5).	3.60	2,484.00

Munsch Hardt Kopf & Harr, P.C.

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Invoice Number: 10546744

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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December 31, 2024

11/26/24	JDC	Telephone conference with John Baumgartner and B. Funk regarding capex comparison and related facts (.2). Continued conference with John Satter, John Baumgartner, and B. Funk (.2). Continued strategy conference with B. Funk (.2). Conference with Hines representatives regarding capex issues (1.2). Follow-up conference with B. Funk regarding plan formulation following factual updates (.2). Continued capex discussions with John Baumgartner and B. Funk (1.0). Plan formulation conference with B. Funk (.3). Telephone conference with Mirza Pena regarding various financial modeling issues (.3). Conference with John Baumgartner and Mirza Pena regarding adjustments to capex comparison schedule (.3). Follow-up telephone conference with Mirza Pena (.1).	4.00	2,760.00
11/26/24	BLF	Prepare for and attend conference regarding capital expenditure projections.	1.10	660.00
11/26/24	ARP	Conduct legal research and analysis related to classification issues.	1.50	750.00
11/27/24	JDC	Review revised capex analysis from Getzler (.2). Conference with Mirza Pena and B. Funk regarding capex and financial modeling (1.0). Conference with John Baumgartner and B. Funk regarding same (1.6). Continued strategy conference with B. Funk regarding plan strategy and financial modeling considerations (1.2).	4.00	2,760.00
11/27/24	BLF	Attend to multiple correspondence regarding plan projections and other outstanding items (1); conferences with M. Pena and J. Cornwell regarding capex projections for plan (1.3); conferences with J. Cornwell, J. Baumgartner and A. Perez regarding outstanding issues for plan and plan projections (1.2).	3.50	2,100.00
11/29/24	ARP	Prepare case law analysis regarding claim classification issue.	0.70	350.00
Total for 11			132.50	77,201.50

Task Code: 12 Tax Matters/Taxing Authorities

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/21/24	CDS	Preliminary conference with J. Cornwell and B. Funk regarding preservation of NOLs of C corporations.	0.40	336.00
11/22/24	ARP	Review correspondence from T. Kiriakos regarding tax appeal issue related to TAF Intellicenter.	0.30	150.00
11/22/24	CDS	Conference with J. Cornwell and B. Funk regarding preservation of NOLs of bankrupt corporations.	0.40	336.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10546744

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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December 31, 2024

11/23/24	CDS	Work on reorganization tax issues; correspond with B. Funk regarding same.	0.70	588.00
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Total for 12	1.80	1,410.00
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Task Code: 13 Business Operations

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/14/24	BLF	Multiple correspondence regarding termination of services at DTC.	0.50	300.00

Total for 13	0.50	300.00
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Total	399.70	\$207,786.50
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Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	Christopher D. Speer	CDS	840.00	1.50	1,260.00
Shareholder	Jamil N. Alibhai	JNA	690.00	3.30	2,277.00
Shareholder	John D. Cornwell	JDC	690.00	50.80	35,052.00
Shareholder	Brenda L. Funk	BLF	600.00	83.30	49,980.00
Shareholder	Julian P. Vasek	JPV	565.00	47.50	26,837.50
Shareholder	Zachary (Zack) A. Schneider	ZAS	550.00	8.60	4,730.00
Associate	Beverly A. Bass	BAB	380.00	11.30	4,294.00
Associate	Julie M. Christensen	JMC	430.00	12.60	5,418.00
Senior Attorney	Alexander R. Perez	ARP	500.00	137.30	68,650.00
Paralegal	Heather J. Valentine	HJV	215.00	43.20	9,288.00
Total				399.40	\$207,786.50

Bill No Charge Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	Julian P. Vasek	JPV	0.30	169.50
Total			0.30	\$169.50

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10546744
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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December 31, 2024

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/21/24	John Cornwell - Hotel - Meals Outside Office: J Cornwell; Working lunch at the Live Oak in the Four Seasons hotel during the DTC Auction while in Austin attending the UT Law CLE - 43rd Annual Jay L. Westbrook Bankruptcy Conference. (John, Brenda & Alex) 11/21	0.00
10/08/24	SP Plus - Parking Validation - Baumgarten, client meeting (B. Funk/J. Cornwell)	28.00
Total		\$28.00

Cost Summary

<u>Description</u>	<u>Amount</u>
Meals-100%	0.00
Parking Validation	28.00
Total	\$28.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	Case Administration/Noticing	12.80	3,296.50
02	General Bankruptcy Advice/Opinions	19.90	11,235.50
03	Schedules, SOFA, IDI and 341 Meeting	12.70	5,124.50
05	Cash Collateral and Postpetition Financing	0.10	69.00
06	Stay Matters	47.10	25,746.50
07	Employment and Fee Applications	23.30	11,674.50
08	Asset Disposition	143.20	68,975.00
09	Leases and Contracts	2.40	1,200.00
10	Bar Date and Claims Administration	3.40	1,553.50
11	Plan and Disclosure Statement	132.50	77,201.50
12	Tax Matters/Taxing Authorities	1.80	1,410.00
13	Business Operations	0.50	300.00
Total		399.70	\$207,786.50

Munsch Hardt Kopf & Harr, P.C.

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Client: The Aztec Fund Holding, Inc.

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Outstanding Invoices

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Total Balance</u>
09/12/24	10537901	119,453.50	95,635.80	23,817.70
10/22/24	10541619	66,835.76	53,536.86	13,298.90
11/20/24	10543978	109,385.00	87,646.20	21,738.80
Total				\$58,855.40



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
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munsch.com

The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: December 31, 2024
Invoice Number: 10546744
Matter Number: 021990.00002

For Professional Services through November 30, 2024

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	207,786.50
Total Costs	\$	28.00
TOTAL THIS INVOICE	\$	207,814.50
Previous Balance	\$	58,855.40
Total Balance Due	\$	266,669.90

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.



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500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: January 23, 2025
Invoice Number: 10548166
Matter Number: 021990.00002

*For Professional Services through **December 31, 2024***

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	233,842.50
Total Costs	\$	<u>1,144.75</u>
TOTAL THIS INVOICE	\$	234,987.25
Previous Balance	\$	<u>41,557.30</u>
Total Balance Due	\$	276,544.55

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10548166
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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January 23, 2025

Fee Detail

Task Code: 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/03/24	HJV	Enter electronic appearances in advance of the hearing (No Charge). Emails with E. Pinales regarding LEDES data requested by J. Whitworth and forward LEDES data to the team (.1).	0.10	21.50
12/04/24	ARP	Correspond with A. Blanadet regarding service of the solicitation procedures motion.	0.10	50.00
12/06/24	HJV	Call with Middleman Messenger regarding removal from service list (.1). Research vendor Allstream to determine its affiliation with any of the Aztec properties (1). Email with A. Perez regarding same (.1).	0.30	64.50
12/27/24	ARP	Correspond with P. Stewart regarding service list address (.1); and correspond with S. McGuire and Stretto team and H. Valentine regarding removal of address from service list and related issues (.1).	0.20	100.00
12/30/24	HJV	Research TDC Clay to determine relationship to Aztec (.1). Email to A. Perez regarding need to update master service list (.1). Discussion with A. Perez regarding upcoming deadlines and case needs (.1).	0.30	64.50
Total for 01			1.00	300.50

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/02/24	ARP	Phone conference with J. Cornwell, B. Funk, J. Baumgartner, R. Gross, and B. Kim regarding plan formulation and support (.5); and phone conference with J. Cornwell, B. Funk, J. Baumgartner and Getzler Henrich team, C. Haddad, and M. Pena regarding plan formulation and support (.9).	1.40	700.00
12/04/24	JDC	Email communications with J. Satter regarding valuation updates.	0.30	207.00
12/05/24	ARP	Case strategy work session with J. Cornwell and B. Funk regarding disclosure statement hearing, plan, and discovery issues.	0.60	300.00
12/05/24	JDC	Conference with B. Funk and A. Perez regarding various pending matters and strategy, including DTC sale, Hilco updated appraisals, disclosure statement hearing, and plan/tax considerations.	0.60	414.00
12/05/24	BLF	Conference with J. Cornwell and A. Perez regarding status of various pending matters in bankruptcy case.	0.60	360.00
12/09/24	ARP	Correspond with V. Herold regarding claim issue.	0.10	50.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10548166

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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12/10/24	ARP	Case strategy session regarding work in process with J. Cornwell, B. Funk, and H. Valentine (.7); phone conference with V. Herold regarding claim issue (.1); and correspond with V. Herold regarding claim issue (.2).	1.00	500.00
12/11/24	BLF	Conference with J. Cornwell regarding status and strategy.	0.20	120.00
12/17/24	ARP	Case strategy phone conference with J. Cornwell, B. Funk, C. Haddad, J. Baumgartner and other professionals regarding Pinnacle Park Land sale and plan and solicitation issues (.4); and work sessions with J. Cornwell and B. Funk regarding solicitation hearing preparation and plan and solicitation issues (.6).	1.00	500.00
12/18/24	ARP	Meeting with B. Funk and J. Baumgartner regarding open items and confirmation issues.	0.50	250.00
12/20/24	ARP	Phone conference with B. Funk, J. Baumgartner, B. Kim, and M. Pena and client team regarding 13 week cash budget, Pinnacle Park Land sale, and other case issues.	1.20	600.00
12/26/24	BLF	Conference with C. Haddad and A. Perez regarding strategy.	0.40	240.00
12/30/24	BLF	Attend WIP meeting with team.	0.50	300.00
12/30/24	ARP	Attend WIP conference with J. Cornwell, B. Funk, and H. Valentine (.5); and correspond with S. McGuire and L. Holl Chang regarding claims register (.2).	0.70	350.00
Total for 02			9.10	4,891.00

Task Code: 06 Stay Matters

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/02/24	JDC	Conference with B. Funk regarding BANA call and hearing strategy (.4). Coordination with team regarding document production (.3). Preparation of email to Tom Kiriakos regarding in-person meeting in advance of hearing (.1). Pre-hearing coordination with MHKH team (.2). Preparation for hearing (.4). Follow-up email communication with Tom Kiriakos regarding scheduling (.1).	1.50	1,035.00
12/02/24	JMC	Review and analyze supporting documents for CAPEX chart for Bowie, Mark Center, and Windward Oaks Properties (2.6); multiple conferences with Brenda Funk regarding production of supporting CAPEX documents (0.7); prepare and finalize CAPEX supporting documents for production (1.1); telephone conference with Bank of America, NA team and experts (0.9); internal telephone conference to discuss strategy and next steps (0.4); email correspondence with Bank of America, NA team to serve CAPEX supporting documents (0.2).	5.90	2,832.00
12/02/24	JNA	Pursue discovery, stay, and plan issues and confer with team regarding same.	0.40	316.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10548166

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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12/02/24	ARP	Phone conference with B. Funk, J. Christensen, J. Baumgartner and Getzler Henrich team, T. Kiriakos and Mayer Brown team, and B. Gamble and Ankura team regarding relief from stay hearing and capital expenditure and plan issues.	0.80	400.00
12/03/24	JNA	Pursue issues regarding case status.	0.30	237.00
12/03/24	JDC	Continued preparation for lift stay preliminary hearing, including analysis of all relevant pleadings and confer with B. Funk (.9). In-person meeting with Mayer Brown team regarding hearing, scheduling for final lift stay hearing, and plan and related discussions (1.0). Attendance of lift stay preliminary hearing (1.5).	3.40	2,346.00
12/03/24	JMC	Review and analyze court filings regarding Chapter 11 plan (0.1); receipt and review of correspondence from J. Cornwell regarding status and next steps (0.2); pursue scheduling and strategy for December 18 and January 17 hearings (0.2).	0.50	240.00
12/03/24	ARP	Attend preliminary hearing on BANA lift stay motion.	0.90	450.00
12/04/24	JDC	Conference with J. Alibhai regarding litigation planning (.2). Conference with J. Alibhai, J. Christensen, B. Funk, and A. Perez regarding document review, capex summary preparation, discovery responses, and related litigation coordination (.5).	0.70	483.00
12/04/24	JNA	Attend team meeting regarding discovery and case strategy issues.	0.50	395.00
12/04/24	JMC	Telephone conference with J. Cornwell, B. Funk, and J. Alibhai regarding discovery strategy and next steps (0.5); begin preparing chart summarizing CAPEX issues for BANA (1.9).	2.40	1,152.00
12/05/24	JMC	Continue preparing chart summarizing CAPEX issues for BANA.	2.60	1,248.00
12/06/24	ARP	Review draft initial set of discovery to BANA.	0.30	150.00
12/06/24	JNA	Review CapEx summary.	0.30	237.00
12/06/24	JMC	Continue and finalize capex summary to John Cornwell and B. Funk.	1.90	912.00
12/06/24	JDC	Attention to appraisal update request from Mayer Brown (.1). Related communication with B. Funk regarding same (.1). Email communication with John Satter requesting finalization of appraisal amendments (.1). Preliminary review of capex summary from J. Christensen (.3).	0.60	414.00
12/08/24	ARP	Revise draft discovery requests to BANA.	0.30	150.00
12/10/24	ARP	Case strategy phone conference with J. Cornwell, J. Baumgartner, J. Satter, and J. Alibhai regarding valuation and Capex issues (.5); work session with J. Christensen regarding responses to BANA on Capex issues (.4); and review correspondence J. Christensen regarding proposed draft response to BANA on Capex issues (.2).	1.10	550.00

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12/10/24	JMC	Conference with A. Perez to discuss revised CAPEX narrative summary action items (0.4); prepare and revise CAPEX narrative summary in order to reflect suggestions from A. Perez (1.0)	1.40	672.00
12/10/24	JNA	Pursue issues regarding valuation and discovery (0.6); participate in videoconference with J. Satter (0.5).	1.10	869.00
12/12/24	ARP	Phone conferences with J. Christensen regarding potential responses to BANA on Capex issues (1.1); review discovery requests from BANA (.5); case strategy conferences with J. Cornwell regarding draft discovery responses to BANA (.4); revise draft discovery responses to BANA (1.2); and review revised Hilco valuation reports (.5).	3.70	1,850.00
12/12/24	JMC	Telephone conference with Alex Perez in order to discuss revisions to CAPEX chart (0.6); telephone conference with Alex Perez to discuss production of documents (0.2); revise Bowie CAPEX narrative summary, compare to supporting documents, and provide narrative analysis as compared to BANA estimates (1.7); revise Mark Center CAPEX narrative summary, compare to supporting documents, and provide narrative analysis as compared to BANA estimates (1.6).	4.10	1,968.00
12/13/24	JMC	Teleconference with J. Cornwell, J. Alibhai and B. Funk regarding upcoming deadlines (0.5); email correspondence to J. Alibhai to confer on draft discovery responses (0.2); facilitate and prepare documents for production (0.9).	1.60	768.00
12/13/24	ARP	Case strategy phone conference with J. Cornwell, B. Funk, J. Alibhai, and J. Christensen regarding issues related to discovery responses to BANA (.5); prepare revisions to draft discovery responses to BANA (2.0); work session with B. Funk regarding revisions to draft discovery responses to BANA (1.3); review responsive documents for production (.5); and draft correspondences to M. Pena and client team regarding document requests (.3).	4.60	2,300.00
12/13/24	JNA	Attend team meeting regarding discovery and depositions (0.5); review draft discovery requests (0.3); review draft discovery responses (0.3); review correspondence regarding discovery and revised reports (0.3).	1.40	1,106.00
12/13/24	HJV	Discussion with A. Perez regarding discovery responses and upcoming production to BANA.	0.20	43.00
12/15/24	JNA	Review and revise draft discovery requests to BANA and draft discovery responses to BANA (2.6); confer with J. Cornwell regarding same.	2.60	2,054.00
12/16/24	JMC	Revise and finalize Aztec's responses and objections to BANA's discovery requests (multiple rounds of revisions) (1.8); review and collect documents in response to same (1.4); attend multiple telephone conferences in furtherance of same (0.6); revise Aztec's Interrogatories and Requests for Production to BANA (1.2); telephone conference with B. Funk regarding discovery (0.2); exchange multiple emails with J. Cornwell, B. Funk, J. Alibhai, and A. Perez regarding discovery (1.6); telephone conference with Charles Haddad	7.70	3,696.00

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Invoice Number: 10548166

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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		regarding discovery responses (0.9)		
12/16/24	ARP	Review documents for production to BANA (.3); revise responses to BANA discovery requests (.2); and draft correspondence to B. Funk and J. Christensen regarding BANA discovery responses and documents (.2).	0.70	350.00
12/16/24	JNA	Pursue issues regarding discovery (0.5); prepare for and participate in client meeting (0.8).	1.30	1,027.00
12/17/24	JMC	Review and analyze lease extension communications from Mirza Pena (0.5).	0.50	240.00
12/17/24	JNA	Pursue issues regarding discovery and disclosure statement hearing.	0.40	316.00
12/20/24	JMC	Telephone conference with B. Funk regarding deposition scheduling strategy (0.3); telephone conference with M. Pena and C. Shah regarding documents and deposition scheduling (0.5); telephone conference with J. Cornwell, A. Perez, B. Funk, and J. Alibhai regarding deposition strategy and scheduling (0.5).	1.30	624.00
12/20/24	JNA	Attend team meeting (0.6); review correspondence regarding depositions (0.3).	0.90	711.00
12/23/24	JMC	Participate in telephone conference with BANA and internal teams in order to discuss deposition scheduling and related issues.	1.30	624.00
12/28/24	JMC	Attend telephone conference with J. Cornwell, J. Alibhai, B. Funk, and A. Perez to discuss strategy and next steps for depositions.	1.20	576.00
12/29/24	JMC	Telephone conference with A. Perez to discuss deposition preparation strategy and action items (1.4); telephone conference with B. Funk and A. Perez to further discuss preparation strategy and action items (1.5); begin preparing deposition outline and materials for Chirag Shah deposition on CAPEX issues (0.9); telephone conference with J. Alibhai, J. Cornwell, B. Funk, and A. Perez to further discuss preparation strategy and action items (0.5); draft BANA 30(b)(6) notice (2.1).	6.40	3,072.00
12/30/24	JMC	Multiple teleconferences (2) with A. Perez to discuss production and deposition action items (1.1); facilitate compilation of key documents for deposition preparation (0.6); review and facilitate production of documents and coordinate internally regarding same (0.9); prepare deposition outline with respect to CAPEX issues (3.8).	6.40	3,072.00

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12/31/24	JMC	Telephone conference with team to discuss deposition preparation strategy (1.4); prepare CAPEX deposition outline and compile potential exhibits regarding same (2.8); review and analyze production and coordinate service regarding same (1.8); prepare deposition outline for Stephen Varitikias (1.1).	7.20	3,456.00
Total for 06			80.40	42,941.00

Task Code: 07 Employment and Fee Applications

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/02/24	HJV	Emails with E. Pinales regarding LEDES data per J. Whitworth's request (.1).	0.10	21.50
12/02/24	ARP	Review first interim fee application of Getzler Henrich (.2); and multiple correspondences with J. Baumgartner regarding first interim fee application of Getzler Henrich (.4)	0.60	300.00
12/03/24	ARP	Review LEDES data supporting Munsch Hardt's first interim fee application and related correspondence (.1); and draft correspondence to J. Whitworth providing LEDES support data (.1).	0.20	100.00
12/09/24	ARP	Correspond with M. Pena regarding Munsch Hardt's third monthly fee statement.	0.10	50.00
12/19/24	HJV	Confer with A. Perez regarding deadline to object to Munsch Hardt's and Getzler's interim fee applications (.1). Attention to updating filing deadline until after 12/26 regarding certificate of no objection (.1). Update docket with recent filings (.3).	0.50	107.50
12/20/24	HJV	Confer with B. Funk regarding status of November fee summary.	0.10	21.50
12/23/24	HJV	Confer with A. Perez regarding revisions to invoice (.2). Revise November invoice (.5). Confer with P. DeLatte regarding same (.1). Prepare fourth monthly fee statement (.5).	1.30	279.50
12/23/24	ARP	Prepare revisions to Munsch Hardt invoice for November 2024 (.5); and work session with H. Valentine regarding incorporation of same (.3).	0.80	400.00
12/24/24	ARP	Revise CNOs for Munsch Hardt and Getzler Henrich first interim fee applications (.3); prepare further revisions to Munsch Hardt invoice for November 2024 (.7); correspond with P. DeLatte and E. Pinales regarding same (.1); and revise Munsch Hardt's fourth monthly fee statement (.1).	1.20	600.00
12/26/24	ARP	Prepare further revisions to Fourth Monthly Fee Statement of Munsch Hardt and invoice (.6); and draft correspondence to J. Cornwell regarding same (.1).	0.70	350.00
12/26/24	HJV	Finalize certificates of no objection as to the interim fee applications of Munsch Hardt and Getzler Henrich (.5). Email to R. Saldana regarding same (.1). Emails with A. Perez and P. DeLatte regarding November invoice revisions (.1).	0.70	150.50

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12/27/24	ARP	Review orders approving interim fee applications (.1); and correspond with J. Baumgartner regarding interim fee application orders (.2).	0.30	150.00
12/30/24	ARP	Draft correspondence to M. Pena and client team regarding hold back payment.	0.10	50.00
12/31/24	JDC	Analysis and preparation of revisions to interim compensation notice (.3). Coordination with A. Perez regarding finalization and transmittal of same (.1).	0.40	276.00
12/31/24	ARP	Prepare final revisions to Munsch Hardt's Fourth Monthly Fee Statement (.3); and draft correspondence to J. Whitworth, T. Kiriakos, and other notice parties and M. Pena regarding Munsch Hardt's Fourth Monthly Fee Statement (.1).	0.40	200.00
Total for 07			7.50	3,056.50

Task Code: 08 Asset Disposition

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/02/24	ZAS	Prepared draft assignment and assumption and amendment of contract.	0.90	495.00
12/02/24	ARP	Review amendment to purchase and sale contract for DTC property (.3); and multiple correspondences with C. Haddad and A. Ward regarding amendment to purchase and sale contract for DTC property (.3).	0.60	300.00
12/03/24	LRD	Email correspondence to Z. Schneider and A. Perez regarding Purchase and Sale Agreement and Assignment, Assumption and Amendment of Purchase and Sale Agreement (.3); Review Purchase and Sale Contract and Assignment, Assumption and Amendment of Purchase and Sale Agreement and prepare Closing Checklist for the transaction (2.3); preparation of Closing Binder Index (1.2).	3.80	1,330.00
12/03/24	JPV	Various correspondence with Newmark and A. Perez regarding Pinnacle Park and related issues (0.5).	0.50	282.50
12/03/24	HJV	Attention to sending amendment to PSA via docusign to Valley Equity Group and C. Haddad (.1). Emails to A. Perez, Z. Scheider and L. Duff regarding same (.1).	0.20	43.00
12/03/24	ARP	Review closing checklist and closing binder coversheet for DTC property (.3); multiple correspondences with Z. Schneider and L. Duff regarding closing logistics for DTC property (.6); work session with H Valentine regarding amendment to PSA for DTC (.1); and correspondence to G. Carr and R. Holman regarding Pinnacle Park Land sales process (.3).	1.30	650.00
12/04/24	ZAS	Corresponded with title regarding outstanding items for closing (0.2). Conferred with A. Perez regarding the execution and delivery of the seller's closing documents, outstanding items for closing, and the draft closing documents provided by title (0.3). Reviewed and completed the draft closing documents provided by title and prepared a summary of additional information needed to finalize such documents	2.90	1,595.00

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		(0.9). Prepared a consent of the seller entity authorizing the sale and closing (0.5). Prepared the draft closing conveyance documents, consent of sole member of TAF 5775 DTC, LLC, and FIRPTA certificate for closing (1.0).		
12/04/24	ARP	Work sessions with Z. Schneider regarding DTC property sale documentation and logistics (.5); gather and analyze items needed for DTC property closing (.5); and multiple correspondences with D. Macias and L. Zicchinella regarding documents and information needed for DTC closing (.9).	1.90	950.00
12/04/24	JPV	Correspondence with G. Carr regarding Pinnacle Park Land.	0.20	113.00
12/05/24	ZAS	Updated the closing documents for M. Pena's execution and prepared a set of execution versions of the closing documents.	1.40	770.00
12/05/24	ARP	Phone conference with J. Vasek and G. Carr regarding Pinnacle Park Land sales process (.3); multiple work sessions with Z. Schneider regarding strategy for notarization of documents needed for DTC closing (1.0); multiple correspondences with L. Zicchinella and Z. Schneider regarding documents and information needed for DTC closing and related closing logistics (1.5); review documents in preparation for DTC property closing (.7); correspond with C. Davis and A. Ward regarding executed amendment to the PSA for the DTC property (.2); correspond with C. Haddad regarding notarization logistics (.5); and phone conference with C. Haddad regarding notarization issues (.2).	4.40	2,200.00
12/05/24	HJV	Attention to document and data collection for DTC sale (.6). Email to Z. Schneider regarding same (.1).	0.70	150.50
12/05/24	JPV	Prepare for and participate in conference with Newmark regarding Pinnacle Park Land (0.3). Review bid procedures order and calendar deadline to file sale order (0.3).	0.60	339.00
12/06/24	ZAS	Reviewed correspondence regarding the execution and delivery of the Seller's signature pages to the closing documents for the sale of the Arapahoe County, CO property and corresponded with A. Perez regarding the same (0.3). Reviewed correspondence with title and buyer regarding the draft settlement statement and comments to the same and reviewed the draft settlement statement (0.4). Reviewed correspondence with the seller team regarding outstanding items for closing and corresponded with A. Perez regarding the same (0.5).	1.20	660.00
12/06/24	ARP	Review DTC closing documents (1.2); draft correspondences to M. Pena and C. Haddad providing instructions for execution and return of documents related to DTC closing (1.5); multiple correspondences with A. Jimenez and D. Macias regarding collection of documents for DTC closing (.9); multiple correspondences with L. Zicchinella, A. Ward, Z. Schneider regarding documents and timing of DTC closing (1.5); multiple phone conferences with M. Pena regarding DTC document execution (.6); correspond with M. O'Connor regarding document request by BANA regarding DTC (.3); revise DTC tenant notice letter (.3); and correspond with J. Turner	6.50	3,250.00

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		regarding proposed language for Pinnacle Park Land sale order (.2).		
12/06/24	HJV	Attention to organizing corporate documents received from client in preparation for DTC sale closing.	0.20	43.00
12/06/24	JDC	Coordination with A. Perez regarding DTC closing issues.	0.20	138.00
12/09/24	HJV	Attention to tracking shipment from client (.6). Discussions with A. Perez regarding same (.2).	0.80	No Charge
12/09/24	ARP	Multiple phone conferences with M. Pena regarding issues related to DTC closing (.7); strategy work session regarding logistics of receipt of signed document package from client (.5); review BANA deliverables for DTC closing (.3); multiple work sessions with Z. Schneider and H. Valentine regarding DTC closing documents and issues (.8); and multiple correspondences with M. Pena, L. Zicchinella, and L. Holl Chang regarding DTC closing, deliverables, and settlement statement (1.5).	3.80	1,900.00
12/10/24	ZAS	Reviewed the compiled closing instruction letter and executed seller documents and prepared comments to the same.	1.00	550.00
12/10/24	ARP	Multiple phone conferences with M. Pena regarding issues related to DTC closing (1.5); draft correspondence to G. Carr regarding status of Pinnacle Park Land bids (.2); review signature package sent by M. Pena (.3); revise DTC closing instruction letter (.3); revise Form 1099-S for DTC closing (.3); multiple work sessions with Z. Schneider and H. Valentine regarding DTC closing instruction packet for delivery to title company (1.2); review drafts of closing settlement statement for DTC property (.6); and multiple correspondences with M. Pena, L. Zicchinella, L. Holl Chang, T. Kiriakos regarding DTC closing, deliverables, and settlement statement (1.0).	5.40	2,700.00
12/11/24	ZAS	Reviewed and prepared comments to the fully executed closing documents (0.4). Reviewed correspondence with title regarding outstanding items for closing (0.3). Closed the sale of the Arapahoe County, CO property (0.4).	1.10	605.00
12/11/24	ARP	Phone conference with G. Carr regarding status of Pinnacle Park Land sale (.3); draft purchase and sale agreement for Pinnacle park Land property (2.0); work session with H. Valentine regarding logistics for potential Pinnacle Park Land property auction (.3); multiple phone conferences with Mirza Pena regarding issues related to DTC property closing (.8); review revised settlement statements for DTC property closing (.4); review final documents for DTC property closing (.8); and multiple correspondences with L. Zicchinella, M. Pena, C. Haddad, regarding issues related to DTC property closing and authorizing closing (1.6).	6.20	3,100.00
12/11/24	HJV	Attention to tracking closing package to ensure delivery (.2). Discussion with A. Perez regarding potential bidders for Pinnacle Park Land sale and auction related punch list items (.3).	0.50	107.50

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12/11/24	JDC	Coordination with A. Perez regarding DTC sale closing and related strategy/timing issues (.1). Telephone conference with Charles Haddad regarding Pinnacle Park sale process (.1).	0.20	138.00
12/12/24	ZAS	Reviewed and revised the form contract for the sale of Pinnacle Park Land.	1.20	660.00
12/12/24	HJV	Attention to scheduling court reporter in anticipation of a 12/18 auction (.1). Determine auction zoom needs and discuss with team regarding same (.3).	0.50	107.50
12/12/24	ARP	Revise draft purchase and sale agreement for Pinnacle Park Land sale (1.5); draft correspondence to Z. Schneider regarding purchase and sale agreement for Pinnacle Park Land sale (.2); draft correspondence to J. Ginley regarding title commitment for Pinnacle Park Land property (.1); phone conference with M. Pena regarding follow up issues on DTC sale (.2); and draft correspondence to J. Cornwell, B. Funk, and J. Baumgartner regarding DTC property sale closing (.2).	2.20	1,100.00
12/12/24	JDC	Coordination with A. Perez regarding DTC closing, closing statement, and related debt paydown considerations (.2). Follow-up communication with J. Baumgartner regarding same (.2).	0.40	276.00
12/13/24	BLF	Conference with A. Perez regarding status of Pinnacle Park Land sale.	0.10	60.00
12/13/24	ARP	Revise purchase and sale agreement for Pinnacle Park Land sale (.3); draft correspondence to J. Baumgartner regarding tax bill for Pinnacle Park Land (.1); and draft correspondence to C. Haddad and M. Pena regarding draft purchase and sale agreement for Pinnacle Park Land (.2).	0.60	300.00
12/13/24	HJV	Coordinate and prepare for potential 12/18 zoom auction.	1.00	215.00
12/15/24	ARP	Draft notice of proposed Pinnacle Park Land sale order (.3); and draft proposed order for sale of Pinnacle Park Land property (2.0).	2.30	1,150.00
12/16/24	JPV	Confer with B. Funk regarding Pinnacle Park Land status (0.2). Correspondence to G. Carr regarding same (0.1). Additional correspondence with B. Funk and Newmark (0.2).	0.50	282.50
12/16/24	JDC	Email communications with G. Carr and team regarding Pinnacle Park sale (.2); review bid (.1).	0.30	207.00
12/16/24	ARP	Correspond with G. Carr regarding purchase and sale agreement for Pinnacle Park Land.	0.10	50.00
12/17/24	JDC	Communications with team regarding Pinnacle Park bidding and auction status (.2). Communication with Charles Haddad regarding his communications with broker (.1). Analysis of various bids (.3). Conference with B. Funk and A. Perez regarding sale status and strategy (.2).	0.50	345.00

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12/17/24	ARP	Review bids on Pinnacle Park Land and correspondence from G. Carr related thereto (1.5); correspond with P. Cowan and D. Noble regarding title commitment for Pinnacle Park Land (.3); multiple correspondence with S. Lexington, J. Walls, and J. Garcia regarding coordination of potential auction for Pinnacle Park Land (.5); and correspond with G. Carr regarding status of bids for Pinnacle Park Land (.2).	2.50	1,250.00
12/18/24	ARP	Phone conference with G. Carr and C. Haddad regarding status of bids and timing issues in connection with sale of Pinnacle Park Land (.8); correspond with S. Lexington and S. Jennings regarding coordination of potential auction for Pinnacle Park Land (.2); prepare notice of extended bid deadline for Pinnacle Park Land (.4); and correspond with G. Carr regarding status of bids for Pinnacle Park Land (.2).	1.60	800.00
12/19/24	ARP	Review title commitment for Pinnacle Park Land (.6); correspond with D. Noble regarding title commitment (.1); and correspond with G. Carr regarding title commitment and Pinnacle Park land updates (.2).	0.90	450.00
12/19/24	ZAS	Reviewed the updated title commitment and exception documents for the Pinnacle Park Land property.	0.50	275.00
12/20/24	ZAS	Corresponded with A. Perez regarding the status and timing of the bid procedure and the DID Mesa, LLC revised contract.	0.60	330.00
12/20/24	ARP	Phone conference with G. Carr regarding status of bids on Pinnacle Park Land (.3); work session with B. Funk regarding updates and bids on Pinnacle Park Land (.2); review revised offer communicated by Stream Realty (.3); phone conference with Z. Schneider regarding issues related to Pinnacle Park Land sale (.4); correspond with G. Carr regarding bids for Pinnacle Park Land (.1); and correspond with B. Funk, J. Cornwell, and Z. Schneider regarding Pinnacle Park Land bids and related issues (.4).	1.70	850.00
12/23/24	ARP	Correspondence with G. Carr and C. Haddad regarding Pinnacle Park Land sales process (.4); phone conference with G. Carr regarding Pinnacle Park Land sales process (.3); review revised purchase and sale agreements for Pinnacle Park Land submitted by bidders (.4); and work sessions with B. Funk regarding Pinnacle Park Land sales process (.4).	1.50	750.00
12/23/24	ZAS	Reviewed and prepared comments to the revised contract from DID Mesa, LLC.	0.90	495.00
12/24/24	ARP	Review correspondence and bid summary for Pinnacle Park Land circulated by G. Carr (.1).; and prepare correspondence to counsel for Dallas County regarding comments to sale order for Pinnacle Park Land (.4).	0.50	250.00
12/24/24	JDC	Analysis of Pinnacle Park land purchase offers and summary from Gary Carr.	0.20	138.00
12/26/24	JPV	Review and organize various outstanding correspondence regarding sale issues (0.3).	0.30	169.50
12/26/24	ARP	Phone conference with G. Carr, C. Haddad, and B. Funk regarding Pinnacle Park Land sale and status of bids (.5); prepare notice of rescheduled auction (.4); correspond with R.	2.20	1,100.00

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		Saldana regarding rescheduling of final hearing on sale of Pinnacle Park Land (.3); and correspond with G. Carr regarding notice of rescheduled auction for Pinnacle Park Land and bid status (.6); correspond with J. Cornwell, B. Funk, and J. Vasek regarding strategy as to timing of Pinnacle Park Land sale (.3); and correspond with J. Turner regarding comments to Pinnacle Park Land sale order (.1).		
12/26/24	BLF	Conference with A. Perez and broker regarding sale process.	0.50	300.00
12/27/24	HJV	Attention to rescheduled sale hearing.	0.10	21.50
12/27/24	ARP	Correspond with R. Saldana regarding rescheduled Pinnacle Park Land sale hearing (.1); prepare notice of continued Pinnacle Park Land sale hearing (.5); and correspond with S. McGuire and Stretto team regarding service of notices related to Pinnacle Park Land sale (.5).	1.10	550.00
12/30/24	HJV	Confer with B. Winn and J. Anderson-Logas regarding zoom auction details and logistics for Pinnacle Park Land.	0.50	107.50
Total for 08			71.00	34,999.00

Task Code: 09 Leases and Contracts

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/08/24	ARP	Correspond with D. Macias responding to question regarding contract treatment.	0.30	150.00
Total for 09			0.30	150.00

Task Code: 10 Bar Date and Claims Administration

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/03/24	ARP	Correspond with S. McGuire regarding claims analysis.	0.10	50.00
12/04/24	ARP	Correspond with S. McGuire regarding claims analysis.	0.10	50.00
Total for 10			0.20	100.00

Task Code: 11 Plan and Disclosure Statement

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/01/24	BLF	Review and revise plan and disclosure statement and correspondence regarding same.	3.60	2,160.00
12/01/24	ARP	Prepare revisions to draft plan and disclosure statement.	0.50	250.00
12/02/24	BLF	Coordinate with A. Perez and H. Valentine regarding plan and disclosure statement finalization (.5); review and coordinate capital expenditure matters (.5); conference with Getzler team regarding same (.6); prepare for and attend client call on plan matters (1.4); conferences with J. Cornwell regarding status and strategy (.6); conference with J. Baumgartner on plan strategy (.2); conference with J. Christensen regarding document review (.2); correspondence with client team and J.	10.30	6,180.00

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		Baumgartner regarding capex documents and conference with J. Cornwell regarding same (.2); prepare for and attend conference with Mayer Brown and Ankura regarding capital expenditure projections (1.3); conference with J. Alibhai and J. Christensen regarding same and discovery plan (.5); review plan and disclosure statement with H. Valentine and A. Perez (1.5); review form of business plan projections and conferences and correspondence regarding same (.5); review and revise solicitation procedures motion and papers (2.3).		
12/02/24	JDC	Conference with Getzler team regarding financial modeling (.6). Email communications with team regarding Capex and supporting documentation collection (.1). Preliminary analysis of draft plan/disclosure statement from B. Funk (.8). Telephone conference with B. Funk regarding strategy for attaching financial modeling as plan supplement (.2).	1.70	1,173.00
12/02/24	HJV	Review, proof and revise draft plan (4.2). Meet with A. Perez to discuss plan revisions (.4). Working team meeting regarding plan and plan revisions (1.1). Further revisions to plan (3.5).	9.20	1,978.00
12/02/24	ARP	Prepare revisions to combined disclosure statement and plan of reorganization (6.8); and meeting with B. Funk and H. Valentine regarding proposed revisions to combined disclosure statement and plan of reorganization (1.5).	8.30	4,150.00
12/03/24	BLF	Final review and revisions to plan (.5); review and revise disclosure statement motion and conference with H. Valentine regarding same (.7); attend conference with Mayer Brown team regarding scheduling for proceedings and attend preliminary hearing for stay motion (2.4).	3.60	2,160.00
12/03/24	JDC	Communications with B. Funk and Mirza Pena regarding plan and tax-related issues.	0.30	207.00
12/03/24	HJV	Further revisions to plan (2.3). Finalize file same (.2). Draft solicitation procedures (3.6).	6.10	1,311.50
12/03/24	ARP	Work session with H. Valentine regarding preparation of final revisions to disclosure statement and plan of reorganization.	1.00	500.00
12/04/24	ARP	Work sessions with B. Funk and H. Valentine regarding revisions to solicitation procedures motion and related proposed notices (.6); and prepare revisions to solicitation procedures motion and related proposed notices (3.0).	3.60	1,800.00
12/04/24	HJV	Revisions to disclosure statement motion, order, exhibits, and solicitation procedures (5.4). Finalize and file same (.5).	5.90	1,268.50
12/04/24	BLF	Review and revise solicitation procedures and related materials (2); attend conference with litigation team regarding discovery plan (.5).	2.50	1,500.00
12/05/24	JDC	Conference with John Satter, John Baumgartner, and B. Funk regarding updating appraisals and various plan confirmation planning considerations.	1.00	690.00
12/05/24	BLF	Conferences with J. Baumgartner, J. Satter and J. Cornwell regarding reports.	0.70	420.00

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12/09/24	JDC	Analysis of capex summary from J. Christensen (.1); communication with A. Perez regarding same (.2).	0.30	207.00
12/10/24	HJV	Working team meeting to determine next steps and strategy (.8). Gather and finalize closing letter documents and contents (4.0).	4.80	1,032.00
12/10/24	JDC	Analysis of draft Hilco revised appraisals (.5). Preparation of email to team regarding same (.1). Telephone conference with J. Alibhai regarding confirmation hearing and stay relief strategy items and discovery issues (.5). Conference with John Satter, John Baumgartner, J. Alibhai, and A. Perez regarding revised appraisal reports (.5). Analysis of and preparation of response email to Brandon Renken regarding discovery status (.3). Telephone conference with J. Alibhai regarding discovery strategy and recent Mayer Brown communications (.1). Conference with B. Funk, A. Perez, and H. Valentine regarding confirmation and disclosure statement approval strategy and ongoing work (.7). Telephone conference with John Satter and John Baumgartner regarding revised appraisal status (.4). Follow-up video conference to discuss capex assumptions and finalization of revised appraisal reports (.7).	3.80	2,622.00
12/10/24	ARP	Correspond with S. McGuire regarding solicitation issues.	0.20	100.00
12/11/24	JPV	Telephone conference with J. Cornwell regarding plan support brief (0.4).	0.40	226.00
12/11/24	JDC	Telephone conference with John Baumgartner regarding plan confirmation coordination and modeling, including strategy for communicating with Ankura to determine avenues for consensual resolution of issues (.7). Conference with B. Funk regarding plan confirmation issues and strategy (.2). Follow-up telephone conference with John Baumgartner following his call with Bruce Gamble (.4). Telephone conference with Charles Haddad regarding recent communications with BANA representatives, Hilco, and Getzler (.2). Telephone conference with J. Vasek to outline and begin preparing brief in support of confirmation (.4). Analysis of proposed final Hilco revised appraisals (.8). Conference with John Baumgartner regarding updated capex figures (.2). Conference with John Baumgartner following communications with John Satter (.2). Preparation of response email to Brandon Renken (.1).	3.20	2,208.00
12/12/24	HJV	Conduct research regarding discovery requests relating to plan confirmation.	1.20	258.00
12/12/24	JDC	Communication with Charles Kelley regarding Hilco revised appraisal delivery expectations (.1). Conference with A. Perez regarding discovery responses and capex summaries (.3). Coordination with H. Valentine for plan confirmation-related discovery request examples (.2). Coordination with John Satter and John Baumgartner regarding appraisal revisions status (.1). Analysis of revised capex summary on Bowie property from J. Christensen (.1). Follow-up strategy conference with A. Perez regarding same (.2). Conference with Getzler team regarding financial modeling and liquidation	1.90	1,311.00

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		analysis; rescheduling of same (.1). Analysis of revised Hilco appraisal reports, including conference with John Baumgartner to confirm latest capex data inclusion (.4). Preparation of email to BANA team attaching revised appraisal reports and coordinating conference to discuss other discovery matters (.2). Preparation of update to client team (.2).		
12/12/24	HJV	Update docket with recent filings (.1). Attention to calendaring deadlines (.1).	0.20	No Charge
12/13/24	JDC	Analysis of revised capex summary analysis from J. Christensen (.2). Telephone conference with J. Alibhai regarding discovery strategy (.2). Conference with John Baumgartner and B. Funk regarding disclosure statement hearing and confirmation issues (.5). Conference with J. Alibhai, J. Christensen, B. Funk, and A. Perez regarding discovery responses, discovery requests preparation, and document production issues (.5). Follow-up strategy conference with A. Perez regarding discovery responses status and capex summary status (.2).	1.60	1,104.00
12/13/24	BLF	Prepare for and attend conference with J. Cornwell (in part), A. Perez (in part) and Getzler team regarding plan projections and liquidity analysis (1.6); conference with litigation team regarding plan discovery preparations (.5); review and revise plan discovery responses and conference with A. Perez regarding same (1.1)	3.20	1,920.00
12/13/24	ARP	Case strategy phone conference with J. Cornwell, B. Funk, J. Baumgartner, R. Gross, and B. Kim regarding liquidation analysis and plan issues in preparation for disclosure statement hearing.	0.50	250.00
12/15/24	JDC	Conference with J. Alibhai to collectively review and revise discovery requests and responses.	1.60	1,104.00
12/16/24	JPV	Review and organize various outstanding correspondence.	0.20	No Charge
12/16/24	BLF	Conferences with J. Cornwell regarding updates on plan and disclosure statement (.4); prepare disclosure statement hearing agenda and witness and exhibit list (.5); correspondence regarding discovery and business plan and liquidation analysis (.3); review and revise responses to discovery requests related to plan (.8); correspondence and conferences with J. Cornwell regarding expert discovery and discovery responses (.4); review documents for production in discovery (2).	4.40	2,640.00
12/16/24	JDC	Communications with B. Funk and J. Christensen regarding revisions to discovery requests and responses (.4). Telephone conference with J. Alibhai regarding discovery strategy (.2). Email communications with Charles Haddad and Mirza Pena regarding discovery review and finalization (.1). Conference with same to review and finalize discovery responses (.9). Communications with Hilco regarding document collection and discovery responsibilities (.2). Coordination of finalization and transmittal of discovery responses and requests (.3).	2.10	1,449.00

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12/17/24	JPV	Prepare for and participate in Zoom conference with Munsch team and opposing counsel regarding disclosure statement hearing (0.8).	0.80	452.00
12/17/24	JDC	Conference with B. Funk regarding update following Mayer Brown conversation, planning for disclosure statement hearing, and related strategy considerations (.3). Related email communication with Mayer Brown team (.1). Communications with John Baumgartner regarding liquidation analysis and financial modeling updates (.3). Analysis of email update from J. Christensen on additional document collection from client (.1). Analysis of market data from Castle sent by Charles Haddad (.1). Client conference regarding same (.5). Analysis of draft liquidation analysis (.2). Analysis of request from UST regarding disclosure statement/plan revisions (.1). Conference with B. Funk and A. Perez regarding various issues in preparation for disclosure statement hearing and plan confirmation process (.4). Various communications with John Baumgartner and B. Funk regarding revisions to liquidation analysis (.4). Analysis of BANA limited objection to disclosure statement approval and appended statement to be added to solicitation package (.5). Coordination with team regarding strategy (.2). Preparation of email to BANA team seeking compromise (.1).	3.30	2,277.00
12/17/24	BLF	Conference with L. Holl Chang regarding status and follow-up conference with J. Cornwell and A. Perez (.5); review and revise plan and conference with team (.7); conferences with J. Cornwell and J. Baumgartner regarding plan models and liquidation analysis (.9); conference with client team (.5); review and revise plan, disclosure statement and solicitation procedures (4.7); attend to liquidation analysis and conference with Getzler team regarding same (1.1); conference with C. Haddad regarding status (.1); conference with counsel for bank of america (.7); follow-up conferences with J. Cornwell and A. Perez (.7).	9.90	5,940.00
12/17/24	ARP	Phone conference with J. Cornwell, B. Funk, T. Kiriakos, L. Holl Chang, B. Renken and others regarding disclosure statement hearing and Pinnacle Park Land sale issues.	0.50	250.00
12/17/24	ARP	Call with S. McGuire regarding balloting and solicitation issues.	0.30	150.00
12/17/24	ARP	Review BANA's limited objection to conditional approval of disclosure statement and requested insert (1.4); review comments and proposed revisions to combined disclosure statement and plan circulated by J. Whitworth (.4); and correspond with J. Whitworth providing response to proposed revisions to combined disclosure statement and plan (.3).	2.10	1,050.00
12/18/24	ARP	Attend hearing on conditional approval of disclosure statement (.7); phone conference with B. Funk and S. McGuire regarding balloting and solicitation issues (.3); multiple correspondences with S. McGuire regarding balloting and solicitation issues (.4); correspond with J. Whitworth, R. Travis, T. Kiriakos, and BANA team regarding proposed	5.00	2,500.00

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		redlines to solicitation materials (.3); correspond with C. Haddad regarding solicitation version of disclosure statement and plan (.1); correspond with S. McGuire regarding classification of certain claims for solicitation (.1); and prepare final versions of solicitation materials (3.1).		
12/18/24	JDC	Various email communications with Getzler team and B. Funk regarding revised liquidation and financial analyses (.4). Electronically appear at disclosure statement hearing (.4). Email communication with Tom Kiriakos and B. Funk regarding objection deadline and revisions to proposed disclosure statement agreements (.2).	1.00	690.00
12/18/24	BLF	Prepare for and attend disclosure statement hearing (4.6); conference with J. Baumgartner on next steps on plan (.5); conference with C. Haddad regarding updates (.2); attend to and coordinate filing for plan solicitation materials (1.2); consider plan supplement materials and conference with J. Cornwell and client team regarding same (1).	7.50	4,500.00
12/19/24	JDC	Communication with B. Funk regarding financial projections and addressing BANA objections.	0.20	138.00
12/19/24	BLF	Correspondence with MHKH and client team regarding plan discovery and confirmation issues (.6); prepare for and attend conference regarding briefing for confirmation (1.1).	1.70	1,020.00
12/19/24	BAB	Confer with B. Funk, J. Vasek, and A. Perez regarding confirmation briefing and research assignments (.9).	0.90	342.00
12/19/24	JPV	Prepare for and participate in Zoom conference with B. Funk, A. Perez, and B. Bass regarding confirmation brief (0.9).	0.90	508.50
12/19/24	ARP	Phone conference with B. Funk., J. Vasek, and B. Bass regarding confirmation research issues (.9); and review BANA's arguments and authorities related to plan confirmation (.9).	1.80	900.00
12/19/24	ARP	Correspond with S. McGuire regarding solicitation.	0.10	50.00
12/19/24	HJV	Confer with A. Perez regarding discovery issues and upcoming depositions (.2).	0.20	43.00
12/20/24	JDC	Conference with MHKH team regarding deposition scheduling and related strategy (.6). Follow-up conference with J. Alibhai regarding same (.1).	0.70	483.00
12/20/24	BLF	Conference regarding litigation preparation (.2); conferences with client team regarding preparations (.5).	0.70	420.00
12/20/24	ARP	Phone conference with J. Cornwell, B. Funk, J. Alibhai, and J. Christensen regarding discovery planning and timing issues.	0.70	350.00
12/23/24	JDC	Email communication with B. Funk coordinating valuation agreement parameters in advance of Mayer Brown conference (.1). Analysis of various emails between John Baumgartner and Mirza Pena regarding revised financial analyses (.2). Post-conference email communications with Charles Kelley regarding valuation updates and discovery issues (.1).	0.40	276.00

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12/23/24	ARP	Phone conference with B. Funk, J. Baumgartner, T. Kiriakos and BANA legal team regarding cash forecasting, discovery scheduling, and Pinnacle Park Land sale amongst other case issues (1.3); and phone conference with B. Funk and J. Baumgartner regarding interest rate and related issues (.4).	1.70	850.00
12/23/24	HJV	Prepare signature pages to restructuring agreement (.9). Confer with B. Funk regarding revisions and finalizing agreement (.2). Package agreement and send to all investors via DocuSign (1.1). Emails with team regarding same (.2).	3.40	731.00
12/23/24	BLF	Correspondence regarding plan proposal (No Charge); review and revise RSA and prepare for execution (1.5); conference with H. Valentine regarding same (.1).	1.60	960.00
12/23/24	JNA	Participate in videoconference with BANA's counsel (1.3); review correspondence regarding discovery and depositions (No Charge).	1.30	1,027.00
12/24/24	ARP	Case law research and strategy session regarding interest rate issues.	2.00	1,000.00
12/26/24	JPV	Review and organize various outstanding correspondence regarding plan issues (No Charge). Begin drafting confirmation brief (3.0).	3.00	1,695.00
12/26/24	ARP	Phone conference with B. Funk and C. Haddad regarding plan and confirmation hearing strategy (.5); phone conference with J. Cornwell, B. Funk, and J. Alibhai regarding discovery issues and confirmation hearing strategy (1.6); phone conference with J. Cornwell, B. Funk, J. Alibhai, and J. Baumgartner regarding confirmation hearing strategy (1.3); prepare draft summaries of testimony and opinions of witnesses in support of confirmation (1.2).	4.60	2,300.00
12/26/24	JNA	Participate in telephone conference with J. Cornwell regarding deposition and trial issues (.7); participate in telephone conference with B. Funk, J. Cornwell, and A. Perez regarding discovery and plan confirmation planning issues (1.6); participate in telephone conference with John Baumgartner, B. Funk, and J. Cornwell to discuss confirmation hearing and evidentiary issues (1.3); participate in telephone conference with Charles Haddad, B. Funk, and J. Cornwell to discuss equity infusion and feasibility considerations (.5); preparation of revisions to draft witness disclosures (.7); participate in telephone conference with J. Cornwell regarding deposition strategy (.4).	5.20	4,108.00
12/26/24	JDC	Analysis of order provisionally approving disclosure statement and supplemented solicitation package (.4). Telephone conference with J. Alibhai regarding discovery and evidentiary issues (.7). Conference with B. Funk, J. Alibhai, and A. Perez regarding discovery and plan confirmation planning issues (1.6). Conference with John Baumgartner, B. Funk, and J. Alibhai to discuss confirmation hearing and evidentiary considerations (1.3). Telephone conference with Charles Haddad, B. Funk, and J. Alibhai to discuss equity infusion and feasibility considerations (.5). Follow-up strategy conference with B. Funk (.2). Preparation of revisions to draft witness	8.00	5,520.00

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		disclosures prepared by A. Perez (.4); related email communication with team (.1). Conference with J. Alibhai regarding deposition strategy (.4). Detailed conference with John Baumgartner and B. Funk regarding financial projections, budget, discovery and plan confirmation issues (2.4).		
12/26/24	BLF	Conferences regarding litigation strategy (3.0); conduct plan research (.7); conference with J. Cornwell and J. Baumgartner regarding plan model (2.4).	6.10	3,660.00
12/27/24	JDC	Email communications with Charles Haddad regarding management fee market rates (.1). Conference with Charles Haddad regarding plan confirmation and potential settlement parameters (.5). Conference with Mirza Pena, B. Funk, and J. Alibhai regarding deposition preparation and additional financial information (1.2); continued conference with B. Funk and J. Alibhai regarding strategy (.2). Telephone conference with Tom Kiriakos regarding potential settlement paths and valuation agreement issues (.2). Review discovery-related email communications between J. Alibhai and Charles Kelley (.2). Analysis of local rule regarding expert report disclosure (.2); related email communications with B. Funk and J. Alibhai regarding applicability (.1). Plan confirmation strategy conference with B. Funk and J. Alibhai (.3). Telephone conference with John Baumgartner and B. Funk regarding valuation agreement strategy (.4). Preparation of detailed update email to client team regarding settlement communications and requesting authority to agree to valuations for confirmation purposes (.4). Telephone conference with J. Alibhai regarding discovery and plan confirmation preparation and strategy (.5).	4.30	2,967.00
12/27/24	JPV	Work on drafting brief in support of confirmation.	6.30	3,559.50
12/27/24	ARP	Work session regarding collection and organization of documents for production to BANA (.5); coordination communications with J. Cornwell, J. Alibhai, B. Funk, and J. Christensen regarding team meeting regarding discovery and litigation strategies (.2); and correspondence with J. Vasek regarding confirmation brief tasks (.1).	0.80	400.00
12/27/24	HJV	Compile all signatures to the Restructuring Support Agreement (.3). Email to B. Funk and J. Cornwell regarding same (.1).	0.40	86.00
12/27/24	JNA	Participate in telephone conference with M. Pena, B. Funk, and J. Cornwell (1.5); review correspondence with Charles Haddad (0.3); confer with J. Cornwell (0.4); review research regarding experts (0.4).	2.60	2,054.00
12/28/24	JDC	Conference with MHKH team to discuss deposition preparation and other discovery-related strategy (1.3). Follow-up strategy conference with J. Alibhai (.5). Preparation of detailed email to Charles Haddad and client team regarding Aztec Management agreement strategy and preparation of amendment to include in plan supplement package (.4). Related email communications with team regarding strategy	4.10	2,829.00

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		(.2). Analysis of draft stipulation from B. Funk relating to property valuations for confirmation purposes, and preparation of revisions to same (.3). Related email communication with B. Funk, J. Alibhai, and John Baumgartner (.2). Follow-up email communications with Charles Haddad regarding management fees (.1). Analysis of historical email transmittals from Charles Haddad providing industry updates regarding commercial real estate market (.8). Collection of relevant materials and transmit same to group for analysis and production (.2).		
12/28/24	JNA	Participate in team meeting (1.3); prepare for depositions (0.4); confer with J. Cornwell (0.3); review draft stipulation (0.3).	2.30	1,817.00
12/28/24	ARP	Case strategy conference with J. Cornwell, J. Alibhai, B. Funk, J. Vasek, and J. Christensen regarding discovery and litigation strategies for confirmation hearing (1.3); and work session regarding preparation of master deposition document and topic outline and collection of related documents (4.5).	5.80	2,900.00
12/28/24	JPV	Zoom conference with J. Christensen, J. Alibhai, J. Cornwell, A. Perez, and B. Funk regarding discovery and confirmation hearing preparation strategy (1.3).	1.30	734.50
12/28/24	BLF	Attend litigation preparation of call with team (1.3); correspondence with J. Cornwell related to litigation stipulations (.5).	1.80	1,080.00
12/29/24	JDC	Email communication with B. Funk regarding strategy for preparing amended Aztec Management agreement to include in plan supplement (.1). Analysis of confirmation hearing and valuation-related email responses from Charles Kelley (.1). Preliminary review of revised Ankura appraisals (.4). Preparation of email to John Ginley regarding preparing amended management agreement (.1); related follow-up email communications with client team (.1). Conference with MHKH team to discuss discovery and confirmation hearing issues (.5).	1.30	897.00
12/29/24	BLF	Attend conferences with MHKH team regarding deposition preparation and other plan confirmation issues.	1.90	1,140.00
12/29/24	JNA	Participate in team meeting regarding depositions (0.4); review correspondence regarding same (No Charge).	0.40	316.00
12/29/24	ARP	Phone conference with J. Christensen regarding deposition preparation issues and tasks (1.3); phone conference with B. Funk and J. Christensen regarding deposition topics and documents (1.5); prepare deposition outline and documents for J. Baumgartner and C. Haddad (2.6); and phone conference with J. Cornwell, J. Alibhai, B. Funk, and J. Christensen regarding deposition scheduling and topics (.4).	5.80	2,900.00
12/29/24	JPV	Continue work on drafting brief in support of confirmation (2.5). Research various issues in connection with same (3.0).	5.50	3,107.50
12/30/24	JDC	Communications with Charles Haddad and the Sainz firm regarding amendment of asset management agreement (.2). Strategy conference with B. Funk regarding management	7.50	5,175.00

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		agreement term sheet, other plan supplement documents, and general confirmation strategy (.4). Telephone conference with J. Alibhai regarding discovery and plan confirmation issues (.5). Analysis of existing asset management agreements (.6). Email communication with Tom Kiriakos confirming BANA's unwillingness to reach settlement agreement (.1). Preparation of client update regarding same (.1). Various email communications with team regarding deposition scheduling (.2). Continued analysis of draft deposition topics outline from A. Perez (.5). Conference with John Baumgartner and B. Funk regarding various financial modeling and plan confirmation issues (1.5). Strategy conference with B. Funk, A. Perez, and H. Valentine (.5). Analysis of various emails from Brandon Renken regarding valuation stipulation and deposition scheduling (.4). Related conference with J. Alibhai and B. Funk (.3). Preparation of draft response to Renken regarding stipulation (.3). Conference with MHKH team regarding document production status and timing (.2). Related follow-up strategy communications with J. Alibhai and B. Funk (.2). Preparation of draft amended asset management term sheet (.8). Telephone conference with J. Alibhai regarding Renken stipulation responses and follow-up strategy (.3). Preparation of revisions to draft response and transmit same to Mayer Brown team (.2). Related communications regarding strategy with B. Funk (.1).		
12/30/24	BLF	Conferences with J. Cornwell regarding status of confirmation preparations (.6); correspondence with Mayer Brown regarding status (.2); conference with J. Baumgartner and J. Cornwell regarding business plan modifications (1.2).	2.00	1,200.00
12/30/24	ARP	Prepare and review document production to BANA (3.8); correspond with J. Baumgartner regarding status and timing of documents for production (.2); multiple work sessions with J. Cornwell and H. Valentine regarding document production to BANA logistics, timing, and contents (1.0); and phone conference with J. Christensen regarding deposition outline preparation and discovery issues (.7). Revise deposition preparation outline for J. Baumgartner and C. Haddad (1.8); and correspond with S. McGuire regarding compiled schedules G (.2).	7.70	3,850.00
12/30/24	JPV	Ongoing research related to confirmation brief (3.7).	3.70	2,090.50
12/30/24	HJV	Compile and organize signatures for the final fully executed Restructuring Support Agreement (.3). Gather and organize documents to be produced to BANA (2.2). Emails with C. Riddell, A. Perez, and J. Christenson regarding same (.3). Working team meeting to discuss case strategy, production, deadlines and plan supplement (1.0).	3.80	817.00
12/30/24	JNA	Confer with J. Cornwell (multiple) regarding deposition and plan issues (0.8); prepare and review correspondence with BANA's counsel regarding same (0.6); review Ankura reports (0.5); review and revise draft stipulation (0.4); confer with B. Renken (0.2); confer with J. Cornwell and B. Funk (0.5).	3.00	2,370.00

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12/31/24	JDC	Telephone conference with J. Alibhai regarding discovery and evidentiary strategy issues (.5). Conference with MHKH team regarding document production and deposition preparation (1.4). Telephone conference with Mirza Pena regarding deposition scheduling and preparations (.2). Conference with J. Alibhai discussing and revising corporate representative deposition notice to BANA (1.0). Coordination with A. Perez and H. Valentine regarding document production (.1). Follow-up telephone conference with Mirza Pena regarding discovery issues (.2). Telephone conference with J. Alibhai regarding Baumgartner and Haddad deposition preparation (.4). Telephone conference with Charles Haddad and B. Funk regarding plan supplementation and deposition preparations (.3). Initial review of documents produced by BANA (.2). Conference with B. Funk regarding same and general deposition preparations (.2). Email communication with John Baumgartner regarding deposition preparation (.1). Conference with A. Perez regarding Baumgartner and Haddad deposition preparation outlines and other matters (.2). Analysis of Renken response email regarding valuation stipulation (.1). Communications with J. Alibhai and B. Funk regarding related strategy (.2).	5.10	3,519.00
12/31/24	BLF	Prepare for and attend conference with team regarding deposition preparation (1.3); conference with J. Cornwell and C. Haddad (.2); conference with J. Cornwell regarding same (.2); conference with J. Vasek regarding briefing (.2).	1.90	1,140.00
12/31/24	ARP	Case strategy phone conference with J. Cornwell, B. Funk, J. Alibhai, and J. Christensen regarding deposition topics (1.3); multiple work sessions with H. Valentine regarding document production to BANA (.5); correspond with H. Valentine, C. Riddell, and J. Christensen regarding production to BANA (.5); revise outline for J. Baumgartner and C. Haddad (4.5); draft correspondence to J. Alibhai providing deposition preparation of documents (.3); and draft correspondence to C. Haddad providing deposition preparation documents (.5).	7.60	3,800.00
12/31/24	JPV	Ongoing research related to confirmation brief issues, such as substantive consolidation (4.8). Telephone conference with B. Funk regarding same (0.4). Research expert disclosure issues and correspond with J. Cornwell regarding same (2.0).	7.20	4,068.00
12/31/24	HJV	Attention to finalizing document production (3.2). Conferences with C. Riddell, A. Perez, and J. Christenson regarding same (.8). Receipt, review, and organize BANA production (.4). Forward BANA production to J. Baumgartner (.2). Attention to calendaring objection deadline regarding fee statement (.1). Attention to finalizing and filings monthly operating reports (.8). Review deposition notices received from BANA and attention to deposition-related scheduling and logistics (.9). Emails with team regarding same (.1).	6.50	1,397.50

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12/31/24	JNA	Attend team meeting (1.3); review and revise corporate representative notice of deposition (1.4); review BANA's discovery responses (0.3); confer with J. Cornwell regarding same and depositions (0.4); review BANA's notices of deposition (0.3); prepare for depositions and review research regarding same (0.9).	4.60	3,634.00
Total for 11			268.50	146,218.00

Task Code: 14 Reporting/MORs

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/08/24	ARP	Review draft monthly operating reports.	0.60	300.00
12/09/24	HJV	Finalize October monthly operating reports for all debtors.	1.10	236.50
12/09/24	ARP	Phone conference with J. Baumgartner regarding proposed revisions to monthly operating reports (.1); and review revised monthly operating reports (.5).	0.60	300.00
12/31/24	ARP	Multiple correspondences with J. Baumgartner regarding monthly operating reports (.2); and review monthly operating reports (.5).	0.70	350.00
Total for 14			3.00	1,186.50
Total			442.00	\$233,842.50

Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	Jamil N. Alibhai	JNA	790.00	28.60	22,594.00
Shareholder	John D. Cornwell	JDC	690.00	62.70	43,263.00
Shareholder	Brenda L. Funk	BLF	600.00	65.70	39,420.00
Shareholder	Julian P. Vasek	JPV	565.00	31.20	17,628.00
Shareholder	Zachary (Zack) A. Schneider	ZAS	550.00	11.70	6,435.00
Associate	Beverly A. Bass	BAB	380.00	0.90	342.00
Associate	Julie M. Christensen	JMC	480.00	52.40	25,152.00
Associate	Lindsey R. Duff	LRD	350.00	3.80	1,330.00
Senior Attorney	Alexander R. Perez	ARP	500.00	133.90	66,950.00
Paralegal	Heather J. Valentine	HJV	215.00	49.90	10,728.50
Total				440.80	\$233,842.50

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Bill No Charge Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	Julian P. Vasek	JPV	0.20	113.00
Paralegal	Heather J. Valentine	HJV	1.00	215.00
Total			1.20	\$328.00

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/31/24	re Transaction - Search	0.00
12/30/24	re Transaction - Search	0.00
12/30/24	Jamil N. Alibhai - Airfare Ticket: J Alibhai; JSX: Flight to and from Houston for depositions and deposition prep sessions.; 01/01/2025 - 01/10/2025	556.00
12/29/24	re Transaction - Search	0.00
12/27/24	re Database - Time	0.00
12/26/24	re Transaction - Display Document	0.00
12/26/24	re Database - Time	0.00
12/26/24	re Print - Line	0.00
12/17/24	Veritext - Court Reporter - Court Reporter for auction held on 11/21/24	541.00
12/10/24	FedEx - Federal Express Tracking ID 770655167814 Shipped By Alex Perez, Munsch Hardt Kopf & Harr, PC, 700 Milam St, Suite 800, HOUSTON, TX 77002 to Lisa Zicchinella, Chicago Title Insurance Company, 711 Third Avenue, 8th Floor, NEW YORK, NY 10017	47.75
Total		\$1,144.75

Cost Summary

<u>Description</u>	<u>Amount</u>
Westlaw Research	0.00
Court Reporter	541.00
Federal Express	47.75
Travel Expenses	556.00
Total	\$1,144.75

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Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	Case Administration/Noticing	1.00	300.50
02	General Bankruptcy Advice/Opinions	9.10	4,891.00
06	Stay Matters	80.40	42,941.00
07	Employment and Fee Applications	7.50	3,056.50
08	Asset Disposition	71.00	34,999.00
09	Leases and Contracts	0.30	150.00
10	Bar Date and Claims Administration	0.20	100.00
11	Plan and Disclosure Statement	268.50	146,218.00
14	Reporting/MORs	3.00	1,186.50
Total		440.80	\$233,842.50

Outstanding Invoices

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Total Balance</u>
12/31/24	10546744	207,814.50	166,257.20	41,557.30
Total				\$41,557.30



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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: January 23, 2025
Invoice Number: 10548166
Matter Number: 021990.00002

*For Professional Services through **December 31, 2024***

Client: The Aztec Fund Holding, Inc.
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Total Fees	\$	233,842.50
Total Costs	\$	<u>1,144.75</u>
TOTAL THIS INVOICE	\$	234,987.25
Previous Balance	\$	<u>41,557.30</u>
Total Balance Due	\$	276,544.55

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: February 7, 2025
Invoice Number: 10549088
Matter Number: 021990.00002

For Professional Services through January 31, 2025

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	663,591.50
Total Costs	\$	<u>40,723.22</u>
TOTAL THIS INVOICE	\$	704,314.72
Previous Balance	\$	<u>276,544.55</u>
Total Balance Due	\$	980,859.27

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
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Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10549088
Client: The Aztec Fund Holding, Inc.
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Fee Detail

Task Code: 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/27/25	ARP	Work session in response to letter filed on the docket by creditor (.5 - No Charge).	0.50	No Charge
01/28/25	HJV	Prepare and finalize notice of filing master service list.	0.20	43.00
01/28/25	ARP	Review revised master service list and approve for filing.	0.10	50.00
Total for 01			0.80	93.00

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/10/25	ARP	Multiple correspondences with J. Baumgartner regarding payment of US Trustee fees (.5); draft correspondence to G. Otto providing response to US Trustee fee issue (.3); and review draft hearing agenda (.1).	0.90	450.00
01/16/25	BSM	Review of proposed confirmation plan, brief, and other client documents in preparation of attending confirmation hearing.	1.10	No Charge
01/17/25	BSM	Attend and observe bankruptcy confirmation hearing.	4.00	No Charge
01/28/25	ARP	Correspond with C. Haddad, M. Pena, and J. Gibbs regarding issues related to insurance settlement.	0.40	200.00
01/30/25	ARP	Follow up with C. Murphy regarding Pinnacle Park water bill issue (.1); and work session with B. Funk regarding budget and expense issues (.3).	0.40	200.00
01/31/25	ARP	Correspond with C. Murphy regarding Pinnacle Park water bill issue.	0.20	100.00
Total for 02			7.00	950.00

Task Code: 07 Employment and Fee Applications

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/09/25	HJV	Review December Munsch Hardt invoice in preparation for drafting December fee statement (.5).	0.50	107.50
01/16/25	ARP	Correspond with M. Pena and A. Jimenez regarding Munsch Hardt's fourth monthly fee statement.	0.10	50.00
01/21/25	BLF	Correspondence and conferences with J. Cornwell and A. Perez regarding fees.	0.20	120.00
01/21/25	ARP	Revise December 2024 invoice for Munsch Hardt.	1.10	550.00
01/22/25	HJV	Prepare fifth monthly fee statement.	0.60	129.00
01/22/25	ARP	Work session regarding finalizing December 2024 invoice.	0.50	250.00
01/23/25	HJV	Revise fifth monthly fee statement.	0.80	172.00

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01/23/25	ARP	Finalize Munsch Hardt's fifth monthly fee statement.	0.50	250.00
Total for 07			4.30	1,628.50

Task Code: 08 Asset Disposition

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/03/25	HJV	Attention to scheduling court reporter for auction (.2). Confer with A. Perez regarding upcoming auction and needs (.2).	0.40	86.00
01/03/25	ARP	Correspond with G. Carr regarding Pinnacle Park Land sale; (.2); and phone conference with G. Carr regarding Pinnacle Park Land sale (.2).	0.40	200.00
01/06/25	ARP	Draft correspondence to G. Carr regarding status of bids for Pinnacle Park Land (.4); phone conference with G. Carr regarding same (.1); review additional bids for Pinnacle Park Land (.3); and prepare correspondence to C. Haddad, J. Cornwell, and B. Funk with comparative bid analysis (.4).	1.20	600.00
01/07/25	HJV	Prepare for Pinnacle Park Land auction (.6). Emails with Veritex regarding DTC transcript (.2).	0.80	172.00
01/07/25	ZAS	Corresponded with Alex Perez regarding the bid process for the sale of the Pinnacle Park lot.	0.20	110.00
01/07/25	ARP	Phone conference with G. Carr regarding auction process and logistics (.4); correspond with bidder representatives L. Davis, P. Cherrick, and R. Kingsbury regarding auction process, logistics, and selection of initial bid (.4); work session preparing for handling of auction (.5); and correspond with D. Noble and P. Cowan regarding escrow details (.1).	1.40	700.00
01/08/25	HJV	Prepare for Pinnacle Park Land auction (.5). Host Pinnacle Park Land auction (.5). Prepare witness and exhibit list for 1/13 sale hearing (.3). Prepare notice of successful bidder (.7). Prepare declaration for C. Haddad (.8). Prepare proposed sale order (.5). Revise notice of successful bidder (.6). Finalize and file notice of successful bidder (.2).	4.10	881.50
01/08/25	JDC	Conference with A. Perez regarding auction opening statement and strategy (.2). Attendance of Pinnacle Park Land auction (.5).	0.70	483.00
01/08/25	ZAS	Corresponded with Alex Perez regarding the status of the purchase agreement and reviewed the execution version of the purchase agreement.	0.60	330.00
01/08/25	ARP	Conduct Pinnacle Park Land auction (.6); phone conference with C. Haddad regarding auction results (.2); draft correspondence to J. Baumgartner regarding auction results (.1); prepare declaration of Charles Haddad in support of Pinnacle Park Land sale (.9); draft correspondence to C. Haddad regarding his declaration in support of Pinnacle Park Land sale (.2); prepare declaration of G. Carr in support of Pinnacle Park Land sale (.9); multiple correspondences with G. Carr regarding his declaration in support of Pinnacle Park Land sale (.4); revise witness and exhibit list for Pinnacle Park Land sale hearing (.1); phone conference with R. Kingsbury	5.70	2,850.00

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		regarding Pinnacle Park Land sales process (.2); multiple correspondences with R. Kingsbury regarding Pinnacle Park Land sales process and PSA (.6); and prepare revisions to PSA (1.3).		
01/09/25	HJV	Finalize and file witness and exhibit list (.6). Finalize PSA and send to Rob Kingsbury via DocuSign (.2). Review executed PSA from Rob Kingsbury (.1). Forward signed PSA to Charles Haddad for review and signature via DocuSign (.2).	1.10	236.50
01/09/25	ARP	Correspondence with A. Ward regarding Denver antenna deposits (.1).	0.10	50.00
01/09/25	ARP	Work sessions with H. Valentine regarding final preparation of PSA for Pinnacle Park Land and collection of signatures (.4); correspondence with R. Kingsbury regarding PSA for Pinnacle Park Land (.1); and prepare final revisions to witness and exhibit list for Pinnacle Park Land sale hearing (.1).	0.60	300.00
01/10/25	HJV	Prepare agenda and proposed PPL sale order (2.1). Prepare redline of PPL sale order (.2).	2.30	494.50
01/10/25	ARP	Conference with Z. Schneider regarding Pinnacle Park Land sales tasks (.2); correspond with D. Noble and K. Hernandez regarding executed PSA and closing requirements from title (.4); correspond with R. Kingsbury regarding executed PSA and intended closing (.2); prepare notice of revised Pinnacle Park Land sale order (.3); correspond with L. Holl Chang regarding comments from BANA to proposed Pinnacle Park Land sale order (.2); prepare final revisions to Pinnacle Park Land sale order (.9); and correspond with A. Blanadet regarding service of revised proposed Pinnacle Park sale order (.1).	2.30	1,150.00
01/10/25	ZAS	Reviewed the title commitment and exception documents as it relates to the closing of the Pinnacle Park lot sale.	0.50	275.00
01/10/25	ARP	Correspond with D. Etges and A. Jimenez regarding DTC antenna rent issue.	0.30	150.00
01/12/25	ARP	Correspond with G. Carr, C. Haddad, and regarding Pinnacle Park Land sale hearing (.4); and prepare for Pinnacle Park Land sale hearing (.4).	0.80	400.00
01/12/25	JDC	Conference with A. Perez regarding presentation and strategy for Pinnacle Park Land sale hearing.	0.30	207.00
01/13/25	ARP	Attend Pinnacle Park Sale and emergency motion hearing (1.2); and multiple correspondences with K. Hernandez and R. Kingsbury regarding entry of Pinnacle Park Land sale order and closing issues (.8).	2.00	1,000.00
01/13/25	ZAS	Reviewed the vesting deed and chain of title for the property and prepared comments to the same.	0.40	220.00
01/14/25	ARP	Correspondence with R. Kingsbury regarding timing of closing for Pinnacle Park Land property.	0.30	150.00
01/14/25	ZAS	Reviewed the updated title commitment.	0.20	110.00
01/15/25	ARP	Multiple correspondences with K. Hernandez regarding Pinnacle Park Land sale closing issues.	0.40	200.00

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01/15/25	ZAS	Reviewed the title company's draft closing documents (0.2). Reviewed the updated title commitment (0.2). Corresponded with Alex Perez regarding outstanding items for closing, including seller entity documents (0.5).	0.90	495.00
01/16/25	ARP	Work sessions with Z. Schneider regarding preparation of documents for Pinnacle Park Land closing and closing details (.3); and work sessions with C. Haddad regarding execution of documents for closing for Pinnacle Park Land (.2).	0.50	250.00
01/16/25	ZAS	Reviewed the existing declaration as it relates to maintenance assessments, the owners association, and the estoppel certificate requested by title (0.7). Reviewed the comptroller's records as it relates to the current status of the owners association named in the existing declaration (0.3). Prepared the closing documents and an execution package for Charles Haddad's signature (1.1).	2.10	1,155.00
01/17/25	ZAS	Prepared a transmittal letter for the closing documents and sent the same to the title company for closing (0.6). Reviewed documentation provided by the client regarding the maintenance assessments from the owner association (0.4). Corresponded with Alex Perez regarding obtaining additional information regarding any outstanding assessments for the closing statement (0.4).	1.40	770.00
01/21/25	HJV	Gather management agreement as it relates to Pinnacle Park Land per A. Perez's request.	0.20	43.00
01/21/25	ARP	Multiple correspondences with K. Hernandez and A. Jimenez regarding documents for Pinnacle Park Land sale closing.	0.60	300.00
01/21/25	ZAS	Reviewed the company agreement provided by the client as it relates to the consent and authorizations required for closing (0.3). Reviewed the entity documents provided by purchaser for closing (0.2). Corresponded with title regarding outstanding items for closing (0.2).	0.70	385.00
01/22/25	ZAS	Call with Alex Perez regarding the settlement statement and outstanding items for the closing of the sale of the Pinnacle Park lot (0.5). Corresponded with the title company regarding its receipt of the executed Seller closing documents (0.2).	0.70	385.00
01/22/25	ARP	Phone conference with Z. Schneider regarding outstanding issues for Pinnacle Park Land sale (.5); phone conferences with G. Carr regarding issues related to Pinnacle Park Land sale (.2); phone conference with A. Jimenez regarding issues related to document request and Pinnacle Park association (.1); follow up with K. Adkison regarding alleged Pinnacle Park association (.2); multiple correspondences with K. Hernandez regarding title requirements for Pinnacle Park Land closing (.3); and draft correspondence to R. Kingsbury and others regarding outstanding items and proposed revised timelines for Pinnacle Park Land sale (.3).	1.60	800.00

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01/23/25	ZAS	Prepared a draft amendment extending the closing date (0.6). Reviewed the additional documentation provided by Gary Carr related to the declaration and owners association (0.3). Reviewed correspondence to the owners association management company related to the outstanding assessments (0.1). Reviewed the draft closing statement (0.2). Corresponded with Alex Perez regarding outstanding items for closing and the Seller's entity documents (0.4).	1.60	880.00
01/23/25	ARP	Conduct investigation regarding status of Pinnacle Park association (.6); review draft settlement statement (.2); and multiple correspondences with J. Baumgartner, M. Pena, and A. Jimenez regarding draft settlement statement (.4).	1.20	600.00
01/24/25	ZAS	Conferred with Alex Perez regarding the executed operating agreement for Seller required for closing (0.6). Reviewed the revised closing statement (0.1). Reviewed correspondence with the owners association and title related to the maintenance assessments for the property and conferred with Alex Perez regarding the same (0.7). Prepared for closing the sale of the Pinnacle Park lot (0.5).	1.90	1,045.00
01/24/25	ARP	Multiple correspondences with R. Kingsbury and C. O'Brien regarding amendment to Pinnacle Park Land PSA (.4); review revised settlement statement (.3); and multiple correspondences with K. Adkison and K. Hernandez regarding Pinnacle Park association fee amounts and handling (1.0); and multiple correspondences with M. Pena, A. Jimenez, and J. Ginley (.5).	2.20	1,100.00
01/27/25	ZAS	Ordered a certificate of fact for the seller entity (0.2). Reviewed correspondence regarding the further updated and approved closing statement (0.2). Reviewed the executed first amendment to contract (0.1). Corresponded with title regarding outstanding items for closing and reviewed the status of outstanding items for closing (0.8). Conferred with Alex Perez regarding the seller company agreement (0.5).	1.80	990.00
01/27/25	ARP	Multiple correspondences with K. Hernandez and L. Holl Chang regarding settlement statement and documents for Pinnacle Park Land closing (1.6); multiple correspondences with R. Kingsbury regarding PSA amendment (.2); correspond with A. Jimenez regarding documents needed for Pinnacle Park Land closing (.3); multiple work sessions with Z. Schneider regarding Pinnacle Park Land sale closing (.5); and correspond with G. Carr regarding issue related to Pinnacle Park building sale (.2).	2.80	1,400.00
01/27/25	MEW	Order Certificate of Fact from TX Secretary of State and download Franchise Tax Account Status from TX Comptroller of Public Accounts for TAF Pinnacle Park Land, LLC.	0.30	96.00

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01/28/25	ZAS	Prepared a closing instruction letter and sent the same to title (0.7). Corresponded with title regarding the FIRPTA, 1099s, and seller certificate of fact (0.3). Reviewed correspondence with title, seller, and purchaser teams regarding outstanding items for closing (0.4). Closed the sale of the Pinnacle Park lot (0.5). Corresponded with title regarding the deed and bankruptcy court order (0.2).	2.10	1,155.00
01/28/25	BLF	Conference with A. Perez regarding sale matters.	0.10	60.00
01/28/25	MEW	Receipt of certificate of fact ordered from the TX Secretary of State (.1). Compile Certificate of Fact and Franchise Tax Account Statement for TAF Pinnacle Park Land, LLC (.1). Email copy to Zack Schneider (.1).	0.30	96.00
01/28/25	ARP	Multiple correspondences with K. Hernandez, A. Jimenez, M. Pena, and L. Holl Chang regarding final issues, documents, and authority related to the Pinnacle Park Land sale closing (3.0); work sessions with Z. Schneider regarding closing of Pinnacle Park Land sale (.5); and phone conference with G. Carr regarding Pinnacle Park building closing (.1).	3.60	1,800.00
01/29/25	ZAS	Reviewed the recorded deed and final closing documents provided by title for the Pinnacle Park land sale.	0.30	165.00
01/29/25	ARP	Correspond with K. Hernandez and L. Holl Chang regarding closing of Pinnacle Park Land sale (.3); and review Pinnacle Park Land post-closing documents (.2).	0.50	250.00
01/31/25	ARP	Correspond with G. Carr and P. Cowan regarding follow up to closing of Pinnacle Park Land sale.	0.20	100.00
Total for 08			54.70	25,675.50

Task Code: 11 Plan and Disclosure Statement

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/01/25	JNA	Travel to Houston for depositions (1.7); prepare for depositions, including review of pleadings, expert materials, and produced documents (3.9); confer with John Cornwell and Julie Christensen (0.5); review legal research (0.4); review and revise draft stipulation (0.3).	6.80	5,372.00
01/01/25	JMC	Exchange multiple correspondence with Chirag Shah in order to coordinate deposition testimony and travel (0.6); confer with John Cornwell, Jamil Alibhai, Brenda Funk, and Alex Perez regarding Chirag Shah deposition strategy (0.3); continue preparing CAPEX deposition summary and outline (4.7)	5.60	2,688.00
01/01/25	ARP	Prepare deposition outline for J. Baumgartner and C. Haddad.	3.00	1,500.00
01/01/25	JDC	Analysis of Haddad/Baumgartner deposition outline from A. Perez, and preparation of additions to same (.4). Continued attention to valuation and related stipulation strategy and communication with team regarding same (.3). Preparation for Baumgartner and Haddad depositions with J. Alibhai (4.4).	5.10	3,519.00
01/01/25	JPV	Work on drafting confirmation brief (3.2).	3.20	1,808.00

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01/02/25	JNA	Confer with J. Baumgartner, J. Cornwell, and B. Funk to prepare for Baumgartner deposition.	10.90	8,611.00
01/02/25	JMC	Revise and finalize deposition notices for BANA 30(b)(6) representative, Stephen Varitikias, and Bruce Gamble (1.2); review and evaluate alleged production errors from BANA and confer with Chris Riddell and Heather Valentine regarding same (1.7); revise deposition and deadline calendar to reflect assignments and deadlines (0.5); continue drafting Stephen Varitikias deposition outline (6.1); review and analyze revised Ankura appraisals (1.6)	10.10	4,848.00
01/02/25	ARP	Draft correspondence to C. Haddad regarding directors and officers for reorganized debtors (.2); drafting and research work session for confirmation brief (5.5); and case strategy work sessions with J. Cornwell, B. Funk, and J. Alibhai regarding handling of auction, deposition, and plan issues, (.6).	6.30	3,150.00
01/02/25	JDC	Conference with J. Baumgartner, J. Alibhai, and B. Funk in preparation for Baumgartner deposition.	11.50	7,935.00
01/02/25	BLF	Attend deposition preparation session for J. Baumgartner.	9.60	5,760.00
01/02/25	JPV	Ongoing research related to confirmation brief, including issues such as feasibility and substantive consolidation (3.4). Prepare substantive consolidation outline (0.4). Work on substantive consolidation portion of brief (3.0). Correspondence with B. Funk and A. Perez regarding status of brief (0.3).	7.10	4,011.50
01/02/25	HJV	Deposition preparation, including preparation of witness binders (4.8). Email to C. Riddell regarding BANA not being able to successfully open our production (.1). Prepare plan supplement schedules (2.2).	7.30	1,569.50
01/03/25	JNA	Prepare for and attend deposition of John Baumgartner (8.5); confer with J. Baumgartner, J. Cornwell, and B. Funk regarding same (0.9); prepare for upcoming depositions and confer with team regarding same (2.3).	11.70	9,243.00
01/03/25	JMC	Draft objections to BANA 30(b)(6) notice (1.8); review and analyze ESI questions from Mia Sclafani and coordinate internally regarding same (0.6); provide summary of ESI questions to John Cornwell, Jamil Alibhai, Brenda Funk, and Alex Perez to discuss response regarding same (0.4); draft email response to Mia Sclafani regarding ESI questions (0.7); prepare for Chirag Shah's deposition preparation session, including compiling and reviewing relevant documents and drafting outline regarding same (1.7); continue drafting deposition outline of Stephen Varitikias (2.9).	8.10	3,888.00
01/03/25	ARP	Work sessions with H. Valentine regarding preparation of assumption schedule and cure amounts (.6); revise notice of assumption schedule (.2); post-deposition debrief meeting with J. Cornwell, J. Alibhai, B. Funk, and J. Baumgartner regarding document collection and preparation for future depositions (1.0); strategy conference with J. Cornwell, J. Alibhai, and B. Funk regarding 30(b)(6) deposition topics	8.60	4,300.00

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		(1.6); conference with J. Cornwell, J. Alibhai, B. Funk, and J. Baumgartner regarding deposition topics (.2); and prepare outline of proof elements (5.0).		
01/03/25	BLF	Strategy conference with MHKH team regarding 30(b)(6) preparations (2.2); prepare for and attend (in part) deposition of J. Baumgartner (8.5); review materials for plan supplement and correspondence and conferences with J. Cornwell and H. Valentine regarding same (1.2).	11.90	7,140.00
01/03/25	JDC	Conference with J. Alibhai, B. Funk, and John Baumgartner in final preparation for deposition (1.0). Attendance of Baumgartner deposition (8.4). Strategy conference with B. Funk, J. Alibhai, A. Perez, and John Baumgartner following deposition regarding preparation for upcoming depositions (2.2). Analysis of and preparation of revisions to plan supplement documents (.2); related conference with B. Funk and H. Valentine (.1).	11.90	8,211.00
01/03/25	JPV	Ongoing work on drafting confirmation brief (4.5).	4.50	2,542.50
01/03/25	HJV	Continue deposition preparation (2.9). Prepare and revise notice of filing plan supplement (3.8). Finalize and file plan supplement and assumption notice (1.5).	8.20	1,763.00
01/04/25	JNA	Prepare for and participate in videoconference with C. Haddad and J. Cornwell (1.8); confer with J. Baumgartner and MHKH team regarding documents and plan issues (0.9); prepare for upcoming depositions and confirmation hearing and confer with MHKH team regarding same (3.8).	6.50	5,135.00
01/04/25	JDC	Conference with Charles Haddad regarding 30(b)(6) topics and deposition preparation (1.8). Conference with MHKH team revising Haddad deposition preparation outline, compiling deposition documents, and preparing for upcoming depositions and confirmation hearing (3.6). Conference with team and John Baumgartner regarding expert report, additional document collection, and general confirmation strategy (1.2).	6.60	4,554.00
01/04/25	BLF	Consider and note plan exhibits (.5); conference with J. Vasek regarding draft confirmation brief and related research (.8); perform research for brief and review cases (1.5); consider case strategy and conference with J. Baumgartner regarding same (.5); conferences with J. Alibi, J. Cornwell, J. Baumgartner and A. Perez regarding deposition preparation, document collection, research and other case strategy items (3.7).	6.90	4,140.00
01/04/25	ARP	Work session with J. Baumgartner regarding collection of documents for production (.2); and work session regarding revisions to deposition outline for C. Haddad (2.7).	2.90	1,450.00
01/04/25	JPV	Review Baumgartner deposition (1.5). Telephone conference with B. Fund regarding brief (0.8). Ongoing research related to confirmation brief (3.5). Continue drafting same (5.1).	10.90	6,158.50
01/05/25	JNA	Prepare for upcoming depositions and confirmation hearing and confer with MHKH team regarding same (6.8); review and revise objections to BANA's deposition notice (0.6).	7.40	5,846.00

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01/05/25	JMC	Finalize and serve objections and designations to BANA 30(b)(6) notice (0.3); prepare for Chirag Shah's deposition preparation session, including compiling and reviewing relevant documents and drafting outline regarding same (1.8); prepare for Charles Haddad's deposition preparation session, including compiling and reviewing relevant documents and drafting outline regarding same (2.6).	4.70	2,256.00
01/05/25	HJV	Gather, finalize and organize documents in advance of Charles Haddad deposition (4.0). Prepare witness binders regarding same (3.0).	7.00	1,505.00
01/05/25	BLF	Review outlines and other deposition preparation materials (1.3); conferences with J. Cornwell and rest of team regarding deposition preparation (1.4); review and prepare trial and deposition preparation materials and meet with trial team regarding same (4).	6.70	4,020.00
01/05/25	JDC	Preparation for Charles Haddad deposition, including revisions to outline, compilation and review of relevant documents, and discussing deposition and case strategies with team (6.8). Review and revise BANA 30(b)(6) notices with team (.6).	7.40	5,106.00
01/05/25	ARP	Work session regarding revisions to deposition outline for Charles Haddad and collection and organization of related documents (5.2); and gather and review documents for production to BANA (.9).	6.10	3,050.00
01/06/25	JNA	Prepare for upcoming depositions and confirmation hearing and confer with MHKH team regarding same, including conference with C. Haddad (9.6).	9.60	7,584.00
01/06/25	JMC	Continue drafting deposition preparation outline for Chirag Shah and compile supporting documents regarding same (2.3); continue drafting deposition outline for Stephen Varitikias (5.5); attend deposition preparation of Charles Haddad and provide deposition preparation support regarding CAPEX items (1.3).	9.10	4,368.00
01/06/25	HJV	Prepare witness and exhibit list (1.3). Prepare lease chart (2.7). Research regarding Bruce Gamble (1.6). Update binders for Haddad preparation of (.3). Review BANA's 1/6 production (.9). Identify bates-numbers overlapping and missing bates-numbers (1.1). Call with J. Christensen regarding BANA production issues (.1). Call with M. Sclafani at Mayer Brown regarding same (.2). Email to M. Sclafani regarding same (.1). Call with C. Riddell regarding same (.2). Emails with C. Riddell regarding Aztec documents that need to be produced (.2).	9.30	1,999.50
01/06/25	JDC	Conference with Charles Haddad, J. Alibhai, and other team members in preparation for Haddad deposition.	8.60	5,934.00
01/06/25	BLF	Prepare for deposition of BANA representative (3.2); preparation with C. Haddad and trial team (2.2); conferences with J. Cornwell regarding status of preparations (.3); conduct research and additional preparations for deposition and trial matters (2.6).	7.40	4,440.00

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01/06/25	ARP	Conduct document review for production to BANA (1.3); work session regarding preparation of document production to BANA (1.5); prepare correspondence to B. Renken and BANA team remitting document production (.1); review case law for confirmation brief (.6); and revise confirmation brief (1.5).	5.00	2,500.00
01/07/25	JMC	Travel to Houston for deposition preparation (4.4); prepare for depositions of Chirag Shah and Stephen Varitikias (6.1).	10.50	5,040.00
01/07/25	HJV	Preparation of witness and exhibit list and begin gathering documents related thereto (5.4). Gather exhibits for BANA 30(6)(b) deposition (.7). Download and organize corrected BANA production (.3); and email to C. Riddell regarding same (.1). Prepare binder with deposition materials for J. Christensen (.7).	7.20	1,548.00
01/07/25	JNA	Prepare for and attend deposition of C. Haddad (9.8); attend team meeting regarding depositions and strategy (0.5).	10.30	8,137.00
01/07/25	JDC	Final preparations with Charles Haddad and J. Alibhai for Haddad deposition (.8). Appearance at and defense of Charles Haddad at Haddad deposition (8.5). Conference with team post-deposition regarding strategy (.5).	9.80	6,762.00
01/07/25	BLF	Perform research related to plan confirmation (1.3); prepare for deposition of C. Blacketer and conference with M. Pena regarding same and regarding deposition preparation (7.6).	8.90	5,340.00
01/07/25	ARP	Work session with J. Christensen regarding deposition preparation for C. Shah (1.0); and multiple case strategy meetings with J. Cornwell, J. Alibhai, B. Funk, and client representatives in preparation for deposition issues (3.0).	4.00	2,000.00
01/08/25	HJV	Prepare exhibits for BANA 30(b)(6) deposition (1.2). Prepare binder of exhibits for J. Christensen in preparation for deposition of Chirag Shah (1.2). Prepare stipulation between Aztec and BANA (.6). Organize exhibits from C. Haddad deposition (.9). Update witness and exhibit list for 1/17 confirmation hearing (.7). Discussion with A. Perez and B. Funk regarding upcoming needs and filings (.2). Prepare notice of intent to adduce remote testimony of Stretto (.6). Prepare exhibits for deposition of Bruce Gamble (.2).	5.60	1,204.00
01/08/25	JMC	Prepare for meeting with Chirag Shah to discuss deposition preparation items and review documents regarding same (0.7); attend meeting with Chirag Shah to discuss deposition preparation items and review documents regarding same (5.4); attend meeting with Mirza Pena to discuss deposition preparation items and review documents regarding same (1.6); continue drafting deposition outline for Stephen Varitikias (2.8); prepare exhibits for deposition of Stephen Varitikias (1.4).	11.90	5,712.00
01/08/25	JNA	Review Gamble's expert report (1.3); prepare draft stipulation (0.2); review BANA's objections to corporate representative notice (0.2); conference with Chirag Shah and J. Cornwell to prepare for deposition (0.8); conference with Mirza Pena and J. Cornwell to prepare for deposition (4.1); confer with Brenda Funk and J. Cornwell regarding BANA deposition (0.3); confer	8.60	6,794.00

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		with J. Cornwell, A. Perez, and J. Christensen regarding property condition reports (0.5); attend team meetings regarding plan confirmation issues and deposition strategy (0.9); review and revise emergency motion to clarify (0.3).		
01/08/25	JPV	Draft motion for interpretation of local rules and correspond with J. Alibhai and J. Cornwell regarding same (1.7).	1.70	960.50
01/08/25	JDC	Preliminary review of BANA expert report on property condition (.3). Conference with Mirza Pena in preparation for her deposition (3.6). Conference with Chirag Shah in preparation for his deposition (.8). Conference with B. Funk regarding Blacketer deposition and related strategy (.3). Conference with J. Christensen and A. Perez in preparation for property condition depositions (.5). Conference with J. Vasek regarding emergency motion relating to expert reports (.2). Conference with J. Alibhai regarding Gamble deposition and confirmation strategy (.4).	6.10	4,209.00
01/08/25	BLF	Prepare for and attend deposition of BANA representative (7.3); continue preparation for trial and team meetings regarding same (2.3).	9.60	5,760.00
01/08/25	ARP	Deposition preparation session with C. Shah and J. Christensen (1.1); gather documents for C. Shah deposition preparation session (.2); case strategy work session with J. Cornwell, J. Alibhai, and J. Christensen regarding issues related to Shah testimony (.9); various work sessions with J. Cornwell, J. Alibhai, and B. Funk regarding plan and trial issues (.8); and correspond with S. McGuire regarding Stretto's participation at confirmation hearing (.1).	3.10	1,550.00
01/09/25	HJV	Gather, prepare and finalize Aztec production (1.2). Email opposing counsel with production (.1). Continue preparation of exhibits for Bruce Gamble's deposition (.2). Organize exhibits used in Chirag Shah deposition (.3). Gather exhibits and prepare binder and copies for the deposition of Bruce Gamble (2.2). Revise stipulation (.6). Revise witness and exhibit list (1.3). Prepare notice of emergency hearing (.3). Finalize and file notice of emergency hearing (.1). Emails with Stretto regarding service of same (.2). Confer with A. Perez regarding the status of the signed PSA and strategy for filings tomorrow (.1).	6.60	1,419.00
01/09/25	JNA	Attend team meetings and pursue case strategy regarding confirmation hearing and preparation regarding same (1.4); review Gamble's expert report and prepare for Gamble deposition (5.2); review, revise, and finalize motion for clarification (0.5); confer with Mirza Pena, J. Cornwell, and B. Funk to prepare for Pena deposition (1.0); confer with J. Christensen and A. Perez regarding property condition depositions (0.4).	8.50	6,715.00
01/09/25	JPV	Review revisions by J. Alibhai to motion to interpret local rule (0.2). Research related to requested changes (0.9). Revisions to motion (0.9). Various correspondence regarding same (0.3). Review notice of hearing and work with H. Valentine regarding same (0.2).	2.60	1,469.00

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01/09/25	JMC	Attend deposition of Chirag Shah (3.2); prepare for deposition of Stephen Varitikias (1.5); take deposition of Stephen Varitikias (5.6); prepare for deposition of Mirza Pena (1.1).	11.40	5,472.00
01/09/25	JDC	Conference with strategy conference with team regarding confirmation hearing and related preparation (1.4). Gamble preparation of and review report (4.1). Analysis of and preparation of revisions to motion for clarification of local rule regarding expert report requirement (.5). Conference with J. Vasek regarding finalizing and filing same (.2). Conference with Mirza Pena, J. Alibhai, and B. Funk in preparation for Pena deposition (1.0). Confer with J. Christensen and A. Perez regarding property condition depositions (.4).	7.60	5,244.00
01/09/25	BLF	Attend to trial and deposition preparation matters (4.5); conference with M. Pena regarding upcoming deposition (3.3); attend team meeting regarding trial preparations (.7); review and consider draft expert report (1.1).	9.60	5,760.00
01/09/25	ARP	Defend deposition of Chirag Shah (3.2); support taking of deposition of Stephen Varitikias (5.6); case strategy conference with J. Alibhai, J. Cornwell, B. Funk, and J. Christensen regarding trial and brief preparations (.9).	9.70	4,850.00
01/10/25	HJV	Call with R. Saldana to discuss the Court's audio/visual capabilities and trial needs (.2). Multiple discussions with C. Riddell and J. Walls regarding trial preparation and trial needs (.9). Multiple conferences with A. Perez regarding upcoming filings, need to amend the assumption contract notice, and preparation of proof chart (1.0). Review and organize deposition transcript rough drafts and exhibits (.5). Review leases to determine security deposits for tenants, Aesthetic Dermatology, CHEP USA, and Primetals (.6) and compare amounts security deposit amounts to assumption notice (.2). Revise assumption notice and prepare redline (1.5). Review and confirm NexBank guaranty and amendments to loan were produced to BANA per B. Funk's request (.3). Prepare proof chart per A. Perez's request (1.4). Team meeting to discuss trial strategy (1.0). Finalize and file notice of proposed sale order, sale order for PPL, agenda, and notice of intent to adduce remote testimony (.5).	8.10	1,741.50
01/10/25	JNA	Prepare for and participate in deposition of B. Gamble (6.6); confer with J. Cornwell regarding Gamble deposition and case strategy for confirmation hearing (1.3); attend team meeting to prepare for confirmation hearing (0.6); travel to Dallas (1.9).	9.40	7,426.00
01/10/25	JPV	Zoom conference with Munsch team regarding strategy (0.5). Begin preparing to-do list for brief (0.1).	0.60	339.00
01/10/25	JDC	Prepare for and participate in Bruce Gamble deposition (6.6). Confer with J. Alibhai regarding Gamble deposition, case strategy, and confirmation hearing preparation (1.3). Conference with MHKH team regarding confirmation hearing preparation (.6).	8.50	5,865.00
01/10/25	JMC	Attend deposition of Mirza Pena (8.7); travel to Dallas from Houston after depositions (3.1).	11.80	5,664.00

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01/10/25	ARP	Work sessions with H. Valentine regarding revisions to assumption schedule (.5); review documents and correspondence for information related to amendments to cure schedule (1.0); conference with J. Vasek regarding briefing issues (.2); conference with J. Cornwell, J. Alibhai, B. Funk, J. Christensen, J. Vasek, and H. Valentine regarding trial preparation and briefing tasks (.5); review certificate of electronic hearing participation for C. Cu (.1);	2.30	1,150.00
01/10/25	BLF	Prepare for and attend deposition of Mirza Pena (8); attend team strategy conference regarding next steps in litigation preparation (.7)	8.70	5,220.00
01/11/25	JNA	Prepare outline of direct testimony for confirmation hearing and discuss with J. Cornwell and B. Funk (1.4); prepare for and attend meeting with J. Cornwell and B. Funk regarding expert and witness issues (1.7); prepare for and attend meeting with J. Cornwell, B. Funk, and J. Baumgartner regarding expert issues and direct testimony (3.0); confer with J. Cornwell regarding trial issues (0.3).	6.40	5,056.00
01/11/25	JMC	Draft direct examination outline of Chirag Shah.	2.30	1,104.00
01/11/25	JDC	Began analysis of various deposition transcripts and prepare direct exam topic outlines for Baumgartner and Haddad (.5). Conference with B. Funk and A. Perez regarding plan supplement, confirmation brief drafting, confirmation hearing preparation, and general confirmation strategy (.8). Conference with B. Funk and J. Alibhai regarding expert issues and witness preparation (1.5). Conference with John Baumgartner, J. Alibhai, and B. Funk regarding expert issues and direct testimony preparation (3.0). Conference with B. Funk and J. Alibhai regarding direct examination outline for Charles Haddad (.7). Telephone conference with J. Alibhai regarding general confirmation strategy (.3).	6.80	4,692.00
01/11/25	BLF	Prepare for and attend discussion on briefing (.8); attend conferences with J. Alibhai and J. Cornwell regarding testimony preparation (2); conference with J. Baumgartner, J. Alibhai and J. Cornwell regarding potential report and testimony (3.5).	6.30	3,780.00
01/11/25	JPV	Zoom conference with B. Funk and A. Perez regarding briefing strategy (0.5). Work on drafting confirmation brief (8.1).	8.60	4,859.00
01/11/25	ARP	Conference with B. Funk and J. Vasek regarding briefing tasks (.4); review deposition transcripts for confirmation brief (2.0); conference with J. Cornwell and B. Funk regarding briefing and plan issues (.6); conduct legal research for confirmation brief (1.5); and draft portions of confirmation brief (3.5).	8.00	4,000.00
01/12/25	ARP	Conference with J. Cornwell, J. Alibhai, and B. Funk regarding briefing and trial issues (.6); and work session regarding research and preparation of inserts for confirmation brief (2.2).	2.80	1,400.00
01/12/25	JNA	Attend MHKH team meeting regarding expert and witness issues and plan confirmation hearing (0.7); confer with J.	5.50	4,345.00

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		Cornwell regarding trial issues and plan confirmation hearing (1.6); preliminary review of draft brief (0.5); review and revise stipulation regarding valuation (0.3); confer with J. Cornwell regarding evidentiary issues (0.5); confer with J. Cornwell, B. Funk, and A. Perez regarding section 1111 issues (0.6); prepare for direct testimony of Charles Haddad (.7); confer with J. Cornwell regarding emergency motion for clarification (0.2); review BANA's draft stipulation regarding expert reports and witnesses and confer with J. Cornwell regarding same (0.4).		
01/12/25	JDC	Conference with J. Alibhai regarding witness preparation, trial organization , and related confirmation strategy issues (1.6). Conference with J. Alibhai, B. Funk, and A. Perez regarding witness preparations and specific issues regarding Mirza Pena (.7). Analysis of Blacketer deposition and preparation of cross-examination outline (2.7). Preliminary review of draft brief in support of confirmation (.3). Conference with team regarding same (.3). Telephone conference with J. Alibhai regarding evidentiary presentation issues (.5). Conference with B. Funk, J. Alibhai, and A. Perez regarding potential 1111(b) issues and related confirmation strategy and financial modeling updates (.6). Follow-up conference with B. Funk and A. Perez regarding same (.2). Conference with J. Alibhai regarding expert report issue and hearing strategy on related emergency motion (.2). Analysis of Charles Kelley email proposing stipulation to resolve same (.2). Telephone conference with J. Alibhai analyzing same and formulating response to Kelley (.2).	8.40	5,796.00
01/12/25	JMC	Continue drafting direct examination outline of Chirag Shah, including preparing summary chart outlining key CAPEX items for examination.	2.10	1,008.00
01/12/25	JPV	Complete draft of confirmation brief and send out to Munsch team for review and comment (4.6). Begin drafting confirmation order (2.7).	7.30	4,124.50
01/13/25	BLF	Prepare for and attend call with M. Pena and A. Perez regarding plan structure and voting (1.8); conferences and correspondence regarding voting matters with Stretto and A. Perez (.7); attend strategy call with client team (1.1); correspondence with counsel for BANA on voting matters (.2); conference with counsel for NexBank regarding potential plan amendments (.2); review BANA objection and conference with MHKH team regarding same (3); consider and draft outline for direct testimony (.9).	7.90	4,740.00
01/13/25	JNA	Confer with J. Cornwell regarding sale and motion hearing and confirmation hearing (0.3); attend hearing regarding sale and motion (0.5); confer with J. Cornwell and B. Funk regarding confirmation hearing (0.3); participate in videoconference with client, counsel, and J. Baumgartner (0.9); review BANA's objection to Plan (1.0); attend team meeting regarding same (2.1); prepare for confirmation hearing (0.8).	5.90	4,661.00

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01/13/25	JDC	Preparation for and attendance of hearing on emergency motion relating to applicability of Rule 26(b), including pre- and post-hearing communications with Charles Kelley and Brandon Renken (2.4). Various communications with B. Funk and A. Perez regarding plan voting and supplement issues (.7). Conference with J. Alibhai and B. Funk regarding evidentiary issues and witness ordering (.3). Preparation for and participation in client and advisor call to provide update, organize efforts to collect plan votes, and prepare for travel and related trial coordination (1.2). Analysis of Charles Haddad deposition transcript (.3). Review BANA objection to plan (.5). Conference with team regarding same (2.1). Continued conference with B. Funk and A. Perez regarding confirmation strategy (.3).	7.80	5,382.00
01/13/25	ARP	Phone conference with B. Funk and M. Pena regarding plan structure and voting issues (.3); conference call with J. Cornwell, J. Alibhai, B. Funk, J. Christensen, J. Baumgartner and Getzler team, J. Ginley, C. Haddad and client team, and A. Sainz and team regarding plan and confirmation hearing issues (1.1); review BANA confirmation objection (1.8); conference with J. Cornwell, J. Alibhai, B. Funk, J. Vasek, and H. Valentine regarding BANA objection and briefing tasks (2.0); case strategy discussion with J. Cornwell regarding confirmation hearing (.5); correspond with P. Hodson, J. Ginley, and V. Prats regarding ballot and voting (.6); multiple correspondences with C. Cu regarding voting results and communications (.6); correspond with C. Haddad, M. Pena, and J. Baumgartner regarding BANA brief (.2); and work session regarding research and preparation of inserts for confirmation brief (1.0).	8.10	4,050.00
01/13/25	HJV	Email with Planet Depos regarding transcripts (.1). Trial preparation (4.6). Review and organize ballots and email B. Funk and A. Perez regarding same (.4). Preparation of amended notice of assumption of contracts (.3). Revise witness and exhibit list (.3). Download and organize exhibits to BANA objection (.2). Review of emails and documents received from J. Baumgartner (.2). Team meeting regarding strategy (2.0). Email to J. Baumgartner regarding Bruce Gamble deposition (.1). Research cases mentioned in BANA objection (.3).	8.50	1,827.50
01/13/25	JPV	Attend hearing on motion to interpret local rule (0.5). Work on confirmation order (3.5). Zoom conference with Munsch team to review objection filed by BANA (2.0).	6.00	3,390.00
01/13/25	JMC	Attend All Hands telephone conference to discuss trial preparation and strategy (0.8). Continue drafting direct examination outline for Chirag Shah (1.6); prepare opening statement PowerPoint slides (1.0).	3.80	1,824.00
01/14/25	JNA	Travel to Houston for confirmation hearing and preparation for same (2.4); review BANA's objection to Plan during travel; confer with J. Cornwell regarding feasibility and BANA plan objection (0.6); conference with BANA team regarding pre-trial meet and confer issues (.4); multiple conferences with J.	13.60	10,744.00

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		Cornwell to review deposition exhibits, BANA confirmation objection exhibits, and confirmation hearing exhibits to select trial exhibits and prepare exhibit and witness list (6.2); confer with H. Valentine regarding same (.4); review and revise Charles Haddad deposition outline (.5); conference with J. Cornwell, B. Funk, and John Baumgartner regarding hearing and preparation (0.7); conferences with J. Cornwell and B. Funk regarding witness preparation and direct examinations (.4); review portions of Pena deposition transcript and confer with J. Cornwell regarding strategy (1.2); conference with A. Perez and J. Cornwell regarding plan voting status and strategy (.2); finalization of draft witness and exhibit list and conference with MHKH team and J. Baumgartner regarding hearing strategy (.6).		
01/14/25	ARP	Work session with J. Christensen regarding direct examination of C. Shah (.8); review documents for potential use during C. Shah direct examination (.5); review deposition transcript of J. Baumgartner for confirmation brief (1.5); prepare confirmation brief inserts (.8); conference with J. Cornwell, J. Alibhai, B. Funk, J. Christensen and T. Kiriakos and BANA team regarding exhibit and trial issues (.5); various work sessions with J. Cornwell, B. Funk, J. Alibhai and H. Valentine regarding trial preparation (.8); work session regarding outreach to Class 4 creditors for voting purposes (3.5); and work sessions regarding further productions to BANA (1.0).	9.40	4,700.00
01/14/25	JDC	Conference with J. Alibhai regarding feasibly and BANA plan objection (.6). Conference with BANA team regarding pre-trial meet and confer issues (.4). Extended conference with J. Alibhai to review deposition exhibits, BANA confirmation objection exhibits, and other witness preparation exhibits to select trial exhibits and prepare exhibit and witness list (5.8). Confer with H. Valentine regarding same (.4). Attention to additions to Charles Haddad deposition outline (.5). Conference with J. Alibhai, B. Funk, and John Baumgartner regarding hearing and preparation and testimony refinement (.8). Telephone conferences with Charles Haddad regarding voting issues and confirmation hearing preparations (.4). Conferences with J. Alibhai and B. Funk regarding witness preparation and reassignment of direct exam responsibilities (.4). Review Pena transcript portions cited by BANA objection and confer with J. Alibhai regarding strategy (1.2). Telephone conference with Mirza Pena regarding travel plans and confirmation strategy (.3). Conference with A. Perez and J. Alibhai regarding plan voting status and strategy (.2). Finalization of draft witness and exhibit list and final conference with MHKH team and John Baumgartner regarding hearing strategy (.6).	11.40	7,866.00

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01/14/25	BLF	Review and revise brief in support of confirmation (3); conference with A. Perez and correspondence regarding voting deadline (.3); correspondence with J. Rudd regarding plan changes (.2); work with J. Baumgartner and client team regarding projections and liquidation analysis (5.3); continue work on trial preparation, witness outlines and exhibits (2.4).	11.20	6,720.00
01/14/25	HJV	Continue research of all cases cited in BANA's objection (1.2). Organize and prepare binder regarding same (.6). Email to court reporter requesting status of final transcripts (.1). Review and organize deposition transcripts and accompanying exhibits (.5). Compare BANA objection to deposition testimony (1.2). Revise witness and exhibit list (.9).	4.50	967.50
01/14/25	JPV	Work on revisions to confirmation brief (2.2).	2.20	1,243.00
01/14/25	JMC	Teleconference with Mayer Brown team regarding trial strategy (0.5); review and identify CAPEX and tenant communication documents with potential exhibits (2.3); review and analyze case law regarding expert admissibility and hearsay (1.7); confer with Alex Perez regarding Chirag Shah testimony (0.6); prepare for trial day 1 (4.3).	9.40	4,512.00
01/15/25	JDC	Review John Baumgartner deposition transcript (2.0). Conference with J. Alibhai regarding hearing strategy (1.5). Attention to finalization of exhibit list and preparation for confirmation hearing with J. Alibhai (1.0). Various conferences with Charles Haddad and John Baumgartner in preparation for confirmation direct examinations (8.0). Conference with team regarding finalization of confirmation brief and response to BANA objection (.5). Various email communications with BANA counsel regarding potential joint exhibits (.3). Telephone conference with Brandon Renken regarding same (.2). Conference with J. Alibhai and J. Christensen regarding opening statement strategy and powerpoint presentation (.7).	14.20	9,798.00
01/15/25	ARP	Work session regarding follow up with Class 4 unsecured creditors (1.5); conference with J. Cornwell, J. Alibhai, B. Funk, J. Christensen, and H. Valentine regarding trial strategy (.4); multiple correspondences with C. Cu regarding voting tabulation (.4); review BANA objection (1.0); revise confirmation brief (7.0); work sessions with H. Valentine regarding production to BANA (.5).	10.80	5,400.00
01/15/25	JNA	Review C. Haddad's deposition transcript (2.0); conference with J. Cornwell regarding hearing strategy (1.5); conferences with C. Haddad and J. Baumgartner to prepare for direct testimony for confirmation hearing (8.0); review and finalize witness and exhibit list (1.0); prepare correspondence to BANA counsel regarding exhibits (0.3); confer with B. Renken and J. Cornwell regarding same (0.2); conference with J. Cornwell and J. Christensen regarding strategy for confirmation hearing, including opening argument (0.7); pursue issues regarding reply brief in support of confirmation plan (0.5).	14.20	11,218.00

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01/15/25	JMC	Travel to Houston to prepare for confirmation hearing and witness preparation meetings (3.3); prepare for Charles Haddad deposition preparation(1.7); meet with Charles Haddad to prepare him for trial testimony (8.5); prepare opening PowerPoint slides (2.7); prepare and revise Chirag Shah direct examination outline (2.2).	18.40	8,832.00
01/15/25	BLF	Review and revise brief and conferences and J. Vasek and A. Perez regarding same (7.1); coordinate production of additional documents and exhibits (1.1); track voting progress and conferences with team members regarding same (.8); conference with J. Rudd (.2); conferences with M. Pena regarding additional document production (.2); continue preparations for trial and conferences with witnesses (7.3).	16.70	10,020.00
01/15/25	JPV	Work on revisions to initial draft of confirmation brief (5.5).	5.50	3,107.50
01/15/25	HJV	Prepare, revise and file witness and exhibit list (1.3). Prepare amended witness and exhibit list (1.5). Compile documents for production (3.0). Prepare documents for production (4.0). Emails with C. Riddell regarding production (.3). Confer with A. Perez regarding production (.2). Prepare witness binders for J. Alibhai (1.2). Trial preparation (1.3).	12.80	2,752.00
01/16/25	JNA	Prepare for confirmation hearing, including conferences with C. Haddad, J. Baumgartner, and C. Shah (7.9); conference with J. Cornwell regarding trial exhibits and exhibit lists (2.5); communicated with BANA's counsel regarding same (0.3); prepare for opening statement and review and revise slide deck regarding same, including conference with MHKH team regarding opening and confirmation hearing (1.5).	12.20	9,638.00
01/16/25	ARP	Prepare amended notice of amended executory contracts assumption list (.8); prepare notice of redlines of amended plan and amended plan supplement (.8); prepare revisions to Stretto voting tabulation (.3); correspond with C. Cu regarding Stretto declaration (.2); conduct legal research in preparation for trial (1.0); prepare final revisions to confirmation brief (6.5); and work sessions with team in preparation for confirmation hearing (2.5).	12.10	6,050.00
01/16/25	JMC	Review and analyze BANA's objections to Debtors' exhibits (0.9); revise direct examination outline for Charles Haddad to include exhibit numbers (1.4); meeting with Charles Haddad for trial testimony preparation (2.6); meeting with Chirag Shah to prepare for trial testimony (5.9); Revise opening PowerPoint slides (2.7); review and analyze evidentiary issues and identify potential hearsay issues (2.4).	15.90	7,632.00
01/16/25	BLF	Prepare, review and revise filings for confirmation hearing (Plan, Plan Supplement, Brief) and coordinate filing of same (7.7); prepare witnesses and materials for trial (6.5).	14.20	8,520.00
01/16/25	JDC	Conference with Charles Haddad, John Baumgartner, and Chirag Shah for confirmation hearing (7.8). Conference with J. Alibhai to review BANA exhibit list and determine agreement and objections to same (2.2). Related email communications BANA counsel (.3). Revisions and additions to debtors' exhibit list (.3). Conference with MHKH team and John Baumgartner	13.10	9,039.00

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		regarding final preparations for hearing, including opening slide presentation, direct examination strategy, and logistics (1.5). Prepare for opening statement (1.0).		
01/16/25	JPV	Complete draft of confirmation brief (2.9).	2.90	1,638.50
01/16/25	HJV	Prepare, revise and file witness and exhibit list (4.0), amended notice of assumed contracts (1.3), amended disclosure statement and plan (.2), and amended plan supplement (1.0). Trial preparation including preparation of binders and exhibits (10.0).	16.50	3,547.50
01/17/25	JMC	Attend trial (10.3); return to Dallas, Texas from trial (2.9).	13.20	6,336.00
01/17/25	ARP	Attendance and participation at confirmation hearing trial.	10.30	5,150.00
01/17/25	JDC	Prepare for and attend confirmation hearing.	10.30	7,107.00
01/17/25	JPV	Research related to confirmation issues (1.3). Correspondence with B. Funk regarding same (0.2).	1.50	847.50
01/17/25	JNA	Prepare for and attend confirmation hearing (10.3).	10.30	8,137.00
01/17/25	HJV	Prepare for trial (5.4). Attend day 1 of trial (10.3).	15.70	3,375.50
01/17/25	BLF	Prepare for and attend confirmation hearing.	10.30	6,180.00
01/19/25	HJV	Team strategy meeting (.6). Email to court reporter regarding requested trial transcript (.1).	0.70	150.50
01/19/25	ARP	Conference with J. Cornwell, J. Alibhai, B. Funk, J. Vasek, and J. Christensen regarding confirmation trial issues and tasks (.6); and conduct legal research regarding confirmation issues (.3).	0.90	450.00
01/19/25	JMC	Attend team telephone conference to discuss Trial Day 2 strategy and action items.	0.60	288.00
01/19/25	BLF	Prepare for and attend conference with J. Cornwell, J. Alibi and team regarding litigation status and strategy (.6); continue research on plan issues (1.7).	2.30	1,380.00
01/19/25	JDC	Telephone conference with J. Alibhai regarding strategy for upcoming hearing (.7). Telephone conference with MHKH team regarding related assignments and preparations for hearing (.6). Telephone conference with B. Funk regarding closing strategy, legal argument, and witness preparations (.2).	1.50	1,035.00
01/19/25	JNA	Conference with J. Cornwell regarding case strategy for confirmation hearing (.7); attend MHKH team meeting regarding case strategy and continuation of confirmation hearing (.6); travel to Dallas (2.0).	3.30	2,607.00
01/20/25	JPV	Telephone conference with J. Cornwell regarding plan issues (.4). Zoom conference with B. Funk and J. Cornwell regarding plan confirmation issues (.7). Complete draft of confirmation order (2.9).	4.00	2,260.00
01/20/25	ARP	Conduct case law research regarding confirmation and procedural issues.	1.80	900.00

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01/20/25	JNA	Review J. Baumgartner deposition transcript to prepare for direct testimony at confirmation hearing (3.0); confer with J. Cornwell regarding case strategy (0.5); review and revise draft stipulation (0.2); participate in videoconference with J. Baumgartner and J. Cornwell (0.9).	4.60	3,634.00
01/20/25	JMC	Review and analyze Bruce Gamble's deposition in order to prepare cross examination outline.	1.60	768.00
01/20/25	BLF	Research issues related to plan terms (3.4); conference with J. Cornwell and J. Vasek regarding Plan terms and research (.7); conference with J. Cornwell regarding litigation status and strategy (.3).	4.40	2,640.00
01/20/25	JDC	Conference with J. Alibhai regarding Baumgartner direct exam preparation, cross examination strategy, and general confirmation hearing strategy (.6). Conference with B. Funk regarding various confirmation legal responses/objections and related presentation strategy (.3). Telephone conference with B. Funk and J. Vasek to discuss confirmation legal considerations and strategy (.7). Conference with J. Alibhai and John Baumgartner regarding direct examination preparation (1.0). Follow-up strategy conference with J. Alibhai (.1). Continue to review Baumgartner deposition transcript (.4).	3.10	2,139.00
01/21/25	BLF	Review Pena deposition and begin deposition designations for same (2.1); conferences with J. Cornwell regarding strategy and status (.2).	2.30	1,380.00
01/21/25	JMC	Continue review and analysis of Bruce Gamble's deposition in order to prepare cross examination outline.	2.50	1,200.00
01/21/25	ARP	Conduct case law research regarding judgment on partial findings.	1.20	600.00
01/21/25	JDC	Telephone conference with B. Funk regarding budget issues and confirmation strategy (.3). Communication with B. Funk regarding Pena deposition edits (.1). Conference with J. Alibhai regarding confirmation hearing strategy (.3). Update telephone conference with Charles Haddad (.1). Detailed telephone conference with J. Alibhai regarding confirmation hearing and direct examination strategy (.7). Various email communications with the Court and opposing counsel regarding scheduling (.2). Telephone conference with John Baumgartner regarding direct examination preparations and scheduling (.4). Continued review of Baumgartner deposition in preparation for direct examination preparation (1.2).	3.30	2,277.00
01/21/25	JNA	Confer with J. Cornwell regarding confirmation hearing issues (0.5); prepare for confirmation hearing (0.5); prepare correspondence to BANA's counsel regarding hearing (0.2).	1.20	948.00
01/22/25	HJV	Attention to calendaring continued trial dates (.1). Organize BANA's supplemental exhibits in preparation for trial (.2). Update BANA's exhibit index (.2).	0.50	107.50

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01/22/25	JMC	Continue drafting Bruce Gamble cross examination outline (4.8); review and analyze Bruce Gamble's report to identify key points for cross examination (0.9); begin review and analysis of Mirza Pena's errata sheet notations (0.9).	6.60	3,168.00
01/22/25	JMC	Telephone conference with Jamil Alibhai to discuss trial preparation strategy for Trial Day 2.	0.30	144.00
01/22/25	JDC	Attention to Blacketer cross-examination outline (.3). Email communication with Rosario Saldana regarding confirmation hearing scheduling (.1). Coordination with J. Alibhai regarding hearing logistics and strategy (.2). Conference with J. Alibhai regarding Baumgartner examination preparations and strategy (.5). Communications with John Baumgartner regarding meeting (.1). Analysis of BANA's amended exhibit list and appended exhibits (.8). Various communications with B. Funk regarding confirmation legal issues and related strategy (.3). Conference with John Baumgartner and J. Alibhai regarding examination preparation (4.1). Telephone conference with Charles Haddad regarding confirmation hearing scheduling and attendance coordination (.2). Telephone conference with Mirza Pena regarding deposition transcript review and lease analysis (.2).	6.80	4,692.00
01/22/25	BLF	Review new exhibits filed by BANA and correspondence with J. Alibhai regarding same.	0.50	300.00
01/22/25	JNA	Travel to Houston for confirmation hearing (1.9); confer with J. Cornwell regarding case strategy and witness testimony (0.7); review BANA's supplemental exhibit list and supplemental exhibits (0.8); confer with J. Baumgartner and J. Cornwell to prepare for confirmation hearing (4.5); prepare for Gamble cross-examination (0.4).	8.30	6,557.00
01/22/25	ARP	Conduct case law research regarding FRBP 7052 (.8); and discussion with J. Cornwell and J. Alibhai regarding FRBP 7052 (.3).	1.10	550.00
01/23/25	JDC	Prepare for confirmation hearing with J. Alibhai, B. Funk, and J. Christensen to discuss Baumgartner direct examination, Gamble cross, examination Blacketer cross examination and continued analysis of BANA amended exhibits (3.0). Conference with John Baumgartner, J. Alibhai and other team members to prepare for Baumgartner direct examination (4.1). Conference with J. Alibhai, J. Christensen, and B. Funk to discuss cross examination strategy and preliminary closing strategy (2.5).	9.60	6,624.00
01/23/25	JPV	Research confirmation issues and correspond with B. Funk regarding same (3.4).	3.90	2,203.50
01/23/25	HJV	Preparation for day two of trial; gather deposition exhibits and prepare binders for witnesses.	11.00	2,365.00

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01/23/25	JMC	Travel to Houston for trial preparation day 2 (3.1); prepare for John Baumgartner trial testimony (5.4); review Mirza Pena's errata sheet notes to identify necessary inclusions (2.1); prepare Mirza Pena deposition designations (1.6); review BANA designations of Mirza Pena and identify objections (1.4); prepare for Bruce Gamble's cross examination (2.2).	15.80	7,584.00
01/23/25	BLF	Review BANA designations for Pena deposition and prepare cross-designations (2.3); review cross outlines for case themes and additional questions (1); conferences with team regarding preparation for direct testimony (1.7); research and review themes and argument for closing and potential mid-trial motions (2.4).	7.40	4,440.00
01/23/25	JNA	Prepare for continuation of confirmation hearing with J. Cornwell, B. Funk, and J. Christensen to discuss Baumgartner direct, Gamble cross, and Blacketer cross, including review of trial exhibits (3.0); confer with J. Cornwell and J. Baumgartner to prepare for Baumgartner direct exam (5.1); prepare for continuation of confirmation hearing with J. Christensen (0.8); confer with MHKH team to prepare for continuation of confirmation hearing, including review and revision of outlines, review of deposition transcripts, and discussion of closing (2.5).	11.40	9,006.00
01/23/25	ARP	Conduct case law research regarding plan related and procedural issues (2.0); and work session with team regarding trial strategy (.4).	2.40	1,200.00
01/24/25	JDC	Preparation for and participation in day 2 of confirmation and lift stay hearings (9.1). Conference with Charles Haddad and advisor team regarding post-hearing strategy (1.0).	10.10	6,969.00
01/24/25	HJV	Prepare for and attend trial.	10.50	2,257.50
01/24/25	JMC	Attend confirmation hearing day 2 (9.1); return travel to Dallas from confirmation hearing (3.4).	12.50	6,000.00
01/24/25	ARP	Conduct legal research regarding plan issue (.8); and follow up conference with client and team (.6).	1.40	700.00
01/24/25	JNA	Prepare for and attend continuation of confirmation hearing (9.1); confer with C. Haddad, J. Baumgartner, and MHKH team regarding case strategy (1.0).	10.10	7,979.00
01/24/25	ARP	Attend confirmation hearing (6.0 - No Charge).	6.00	No Charge
01/24/25	BLF	Prepare for and attend trial day 2 (9.1); follow-up conference with client (in part) (.6).	9.70	5,820.00
01/25/25	JDC	Telephone conference with B. Funk regarding status (.1). Telephone conference with J. Alibhai and B. Funk regarding updates and go-forward strategy (.2). Email communications B. Funk and John Baumgartner regarding plan amendment modeling and strategy (.2). Telephone conference with J. Alibhai regarding same (.2).	0.70	483.00
01/25/25	JNA	Confer with J. Cornwell and B. Funk regarding plan confirmation (0.2); confer with J. Cornwell regarding plan confirmation hearing strategy (0.2); review financial projections (0.4).	0.80	632.00

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01/25/25	BLF	Conference with client team regarding strategy (.7); conference with J. Baumgartner regarding potential revised plan (1); conferences with J. Cornwell and J. Alibhai regarding strategy (.3).	2.00	1,200.00
01/26/25	JDC	Review of revised financial model from John Baumgartner (.2). Conference with J. Alibhai, B. Funk, and John Baumgartner regarding plan modeling and strategy (1.0). Prepare for and participate in client conference (.7). Conference with J. Alibhai regarding strategy in advance of Mayer Brown conference (.3). Telephone conference with Charles Haddad regarding authority to make certain representations to BANA (.2). Participate in conference with BANA's counsel regarding plan options and continuance request (.4). Telephone conference with J. Alibhai and B. Funk regarding plan strategy and continuance presentation (.6). Preparation of email to Tom Kiriakos regarding proposed stipulation and consultation (.2). Telephone conference with Charles Haddad regarding status (.1). Conference with BANA team regarding stipulations (.4). Follow-up conference with Charles Haddad, J. Alibhai and B. Funk (.3). Analysis of email response from Tom Kiriakos and confer with J. Alibhai regarding response (.3).	4.70	3,243.00
01/26/25	JNA	Prepare for and participate in videoconference with J. Cornwell, B. Funk, and J. Baumgartner (1.0); prepare for and participate in videoconference with J. Cornwell, B. Funk, J. Baumgartner, and client (.7); confer with J. Cornwell (multiple) regarding confirmation hearing (0.3); participate in conference with J. Cornwell, B. Funk, J. Christensen and BANA's counsel (0.4); confer with J. Cornwell and B. Funk (multiple) regarding plan issues (0.6); participate in conference with J. Cornwell, B. Funk, and BANA's counsel (0.4); participate in conference call with J. Cornwell, B. Funk, and C. Haddad (0.3); review and respond to multiple emails from T. Kiriakos regarding hearing (0.3).	4.00	3,160.00
01/26/25	JMC	Telephone conference with BANA team to discuss status and next steps.	0.40	192.00
01/26/25	BLF	Conferences with J. Baumgartner, J. Cornwell and J. Alibhai regarding potential revised plan and strategy (1); conference with client team regarding same (.8); conferences with BANA counsel regarding continuance and stipulations (.7).	2.50	1,500.00
01/27/25	BLF	Conference with client regarding next steps (.2); conferences with J. Cornwell and J. Alibhai regarding same (.2); prepare for and attend status conference (.7).	1.10	660.00
01/27/25	JDC	Analysis of response regarding hearing change from Rosario Saldana (.1). Analysis of proposed stipulation from Lisa Holl Chang, and preparation of revisions to same (.4). Related strategy coordination with J. Alibhai (.2). Preparation of response attaching stipulation redline to BANA counsel (.1). Attendance of status conference and confer with Charles Kelley and Brandon Renken regarding status before and after hearing (.6). Preparation of additional revisions to stipulation	1.70	1,173.00

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		and related communications with Lisa Holl Chang to finalize same (.3).		
01/27/25	JNA	Review and revise draft stipulation (0.3); attend status conference with Court (0.2); confer with J. Cornwell and B. Funk regarding plan issues (0.3); travel to Dallas (2.0).	2.80	2,212.00
01/27/25	ARP	Attend status conference (.3 - No Charge).	0.30	No Charge
01/28/25	BLF	Conferences with J. Cornwell and client team regarding proposals.	0.50	300.00
01/28/25	JMC	Review and finalize deposition designation highlights for court record.	0.60	288.00
01/28/25	JDC	Communications with J. Christensen regarding Pena transcript submission and coordination with Mayer Brown regarding same (.1). Communications with Lisa Holl Chang regarding entered stipulation and transfer of funds (.1). Preparation of email to and telephone conference with Mirza Pena regarding same (.3). Various conferences with B. Funk regarding go-forward strategy (.6). Telephone conference with Charles Haddad regarding investor communications and case strategy (.3). Telephone conference with Charles Haddad and Victor Prats regarding same (.7).	2.10	1,449.00
01/29/25	JMC	Revise and finalize Joint Notice of filing of Mirza Pena deposition designations.	0.80	384.00
01/29/25	BLF	Conference with client team regarding potential proposal (.2); consider and prepare draft proposal (.2); conferences with J. Cornwell and J. Baumgartner regarding same (.4); review information from M. Pena and incorporate into potential offer (.2); begin preparation of case correspondence for use with investor group regarding plan.	1.30	780.00
01/29/25	JDC	Analysis of payments to BANA pursuant to stipulation and coordination with B. Funk regarding same (.2). Analysis of proposed settlement structure email from B. Funk to client team (.1). Conference with B. Funk regarding same (.3).	0.60	414.00
01/30/25	BLF	Conferences and correspondence related to plan proposals.	1.90	1,140.00
01/30/25	JDC	Email communication with Tom Kiriakos (.1). Conference with B. Funk regarding status and strategy (.2). Telephone conference with Charles Haddad and B. Funk regarding investor communications and strategy (.3). Analysis of draft settlement email from B. Funk (.1). Analysis of Tom Kiriakos email confirming receipt of stipulated disbursement funds (.1). Telephone conference with Tom Kiriakos and B. Funk regarding forthcoming settlement offer and background (.2). Analysis of email from B. Funk to Mayer Brown describing same (.1). Conference with B. Funk regarding potential revised plan structure (.2). Analysis of email from Tom Kiriakos describing rejection of settlement offer (.1). Preparation of email forwarding same to client team and providing relevant context and scheduling conference (.2). Preparation of response email to Tom Kiriakos (.1).	1.70	1,173.00

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01/31/25	BLF	Conference with client team regarding options (1.1); follow-up conferences with J. Cornwell and J. Baumgartner (.5); conferences with Mayer Brown regarding revised proposal and conferences with J. Cornwell regarding same (.8).	2.40	1,440.00
01/31/25	JDC	Coordination with B. Funk in advance of client call (.2). Conference with client team regarding go-forward strategy (.6). Analysis of fee estimate Excel spreadsheet (.1). Conferences with B. Funk and John Baumgartner regarding same (.5). Email communication with Tom Kiriakos regarding scheduling of conference (.1). Conference with B. Funk in advance of Mayer Brown call regarding strategy (.1). Conference with Tom Kiriakos and team regarding settlement proposal and structures (.3). Follow-up telephone conference with Lisa Holl Chang, Tom Kiriakos, and B. Funk regarding certain settlement points (.2). Telephone conference with Tom Kiriakos and B. Funk to receive settlement response from BANA (.2). Follow-up strategy conference with B. Funk regarding same (.1). Analysis of email from Tom Kiriakos outlining settlement offer (.1).	2.50	1,725.00
Total for 11			1,122.10	635,244.50
Total			1,188.90	\$663,591.50

Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	Jamil N. Alibhai	JNA	790.00	204.30	161,397.00
Shareholder	John D. Cornwell	JDC	690.00	204.50	141,105.00
Shareholder	Brenda L. Funk	BLF	600.00	184.50	110,700.00
Shareholder	Julian P. Vasek	JPV	565.00	72.50	40,962.50
Shareholder	Zachary (Zack) A. Schneider	ZAS	550.00	15.40	8,470.00
Associate	Julie M. Christensen	JMC	480.00	190.00	91,200.00
Senior Attorney	Alexander R. Perez	ARP	500.00	154.20	77,100.00
Paralegal	Heather J. Valentine	HJV	215.00	151.00	32,465.00
Paralegal	Margaret E. Wingert	MEW	320.00	0.60	192.00
Total			1,177.00	\$663,591.50	

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Bill No Charge Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Amount</u>
Associate	Brittani (Brie) S. Miller	BSM	5.10	765.00
Senior Attorney	Alexander R. Perez	ARP	6.80	3,400.00
Total			11.90	\$4,165.00

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
01/30/25	Veritext - Deposition - Transcript of Aztec deposition taken on 1/24/25	2,160.80
01/27/25	Jamil N. Alibhai - Lodging: J Alibhai; Hotel stay for JNA while in Houston for Aztec confirmation hearing. 1/22-27	1,793.61
01/26/25	Jamil N. Alibhai - Airfare Ticket: J Alibhai; JSX: Flight from Houston to Dallas following Aztec Confirmation Hearing Day 3.; 01/27/2025 - 01/27/2025	234.00
01/24/25	Judicial Transcribers of Texas, LLC - Copies of Court Transcripts - Transcript of hearing held on 01/17/25	2,555.00
01/24/25	Julie M. Christensen - Lodging: J Christensen; Hotel stay in Houston for Aztec hearing. 1/23-24	464.48
01/24/25	Julie M. Christensen - Car Service/Taxi: J Christensen; Uber from DFW to JC home following flight from Houston to attend Aztec hearing. 1/24	50.90
01/23/25	Julie M. Christensen - Car Service/Taxi: J Christensen; Uber from Hobby airport to Houston office to attend Aztec hearing. 1/23	40.65
01/23/25	Julie M. Christensen - Car Service/Taxi: J Christensen; Uber to DFW airport for flight to Houston to attend Aztec hearing. 1/23	42.44
01/22/25	Jamil N. Alibhai - Car Service/Taxi: J Alibhai; Uber from JNA home to JSX airline for flight to Houston for Aztec confirmation hearing. 1/22	15.00
01/21/25	Julie M. Christensen - Airfare Ticket: J Christensen; Flight to and from Houston for Aztec hearing.; 01/23/2025 - 01/24/2025	643.96
01/19/25	Jamil N. Alibhai - Car Service/Taxi: J Alibhai; Uber from JSX to JNA home following flight from Houston for depositions/trial. 1/19	22.76
01/19/25	Jamil N. Alibhai - Airfare Ticket: J Alibhai; JSX: Flight from Dallas to Houston for Aztec Confirmation Hearing Day 3.; 01/22/2025 - 01/22/2025	342.00
01/18/25	Jamil N. Alibhai - Lodging: J Alibhai; Hotel stay at JW Marriott Houston Downtown while in town for depositions/trial. 1/15-18	1,063.53

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01/17/25	FedEx - Federal Express Tracking ID 771512064880 Shipped By ZACK SCHNEIDER / CHRISTINA TILLEY, MUNSCH HARDT KOPF & HARR PC, 700 MILAN STREET, SUITE 800, HOUSTON, TX 77002 to Attn: Kim Hernandez, Commonwealth Land Title, 4400 MacArthur Blvd., Suite 800, , NEWPORT BEACH, CA 92660 (Task No. 8)	73.28
01/17/25	Julie M. Christensen - Car Service/Taxi: J Christensen; Uber from DFW home following Aztec depos/trial in Houston. 1/17	52.65
01/17/25	Julie M. Christensen - Lodging: J Christensen; Hotel stay in Houston for Aztec depos/trial. 1/15-17	745.27
01/17/25	Julie M. Christensen - Car Service/Taxi: J Christensen; Uber from post- trial dinner to Hobby following Aztec depos/trial in Houston. 1/15	33.93
01/17/25	Julie M. Christensen - Airfare Ticket: J Christensen; Flight from Houston to Dallas following Aztec Depos/Trial; 01/17/2025 - 01/17/2025	334.48
01/16/25	Planet Depos, LLC - Deposition - Transcript of Mirza Pena deposition taken 01.10.25	3,774.20
01/15/25	Jamil N. Alibhai - Lodging: J Alibhai; Hotel stay at Houston Hobby Airport Marriott while in town for depositions. 1/14- 15	176.09
01/15/25	Planet Depos, LLC - Deposition - Transcript of Bruce Gamble Deposition Taken 01/10/25.	3,232.05
01/15/25	Julie M. Christensen - Car Service/Taxi: J Christensen; Uber from home to airport to travel to Houston for Aztec depos/trial. 1/15	42.99
01/15/25	Julie M. Christensen - Car Service/Taxi: J Christensen; Uber from Hobby airport to Houston office for Aztec depos/trial. 1/15	37.07
01/15/25	Planet Depos, LLC - Deposition - Transcript of Chirag Shah Deposition Taken 01/09/25	2,521.05
01/15/25	Planet Depos, LLC - Deposition - Transcript of Stephen Varitikias Deposition Taken 01/09/25	3,868.80
01/14/25	Lexitas - Deposition - Transcript of Auction deposition taken 01/08/2025 - Case: 24-90436	730.00
01/14/25	Planet Depos, LLC - Deposition - Transcript of John D. Baumgartner deposition taken 1/3/2025	3,422.70
01/14/25	Jamil N. Alibhai - Car Service/Taxi: J Alibhai; Uber from JNA home to JSX for flight to Houston for depositions. 1/14	22.24
01/14/25	Julie M. Christensen - Airfare Ticket: J Christensen; Flight from Dallas to Houston re Aztec Depos/Trial.; 01/15/2025 - 01/15/2025	329.48
01/13/25	Planet Depos, LLC - Deposition - Transcript of Casey Blacketer deposition taken 1/8/25	2,351.85

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<u>Date</u>	<u>Description</u>	<u>Amount</u>
01/13/25	Planet Depos, LLC - Deposition - Transcript of Charles Haddad, Corporate Designee deposition taken 1/7/25	4,658.85
01/12/25	Jamil N. Alibhai - Airfare Ticket: J Alibhai; Upcoming JSX flight to/from Houston for additional depositions.; 01/14/2025 - 01/19/2025	398.00
01/10/25	Julie M. Christensen - Lodging: J Christensen; Hotel stay in Houston for Aztec deposition. 1/7-10	975.78
01/10/25	Julie M. Christensen - Airfare Ticket: J Christensen; JSX: Flight home from Houston for Aztec deposition.; 01/10/2025 - 01/10/2025	260.00
01/10/25	Julie M. Christensen - Car Service/Taxi: J Christensen; Uber from JSX airport/hangar to Love Field airport for Aztec deposition in Houston. 1/10	10.48
01/10/25	Julie M. Christensen - Parking: J Christensen; Parking at DFW airport for flight to Houston re Aztec depositions. 1/7-10	84.00
01/10/25	Jamil N. Alibhai - Car Service/Taxi: J Alibhai; Uber from DFW Airport to home following flight from Houston for multiple depositions and depo prep sessions. 1/10	17.07
01/10/25	Jamil N. Alibhai - Lodging: J Alibhai; Hotel stay in Houston for multiple depositions and depo prep sessions. 1/1-10	2,605.70
01/07/25	Julie M. Christensen - Car Service/Taxi: J Christensen; Uber from Hobby airport to Houston office (700 Milam) for Aztec deposition. 1/7	40.90
01/06/25	Jamil N. Alibhai - Hotel Other: J Alibhai; Hotel Dry cleaning during stay in Houston for multiple depositions and depo prep sessions. 1/6	33.00
01/06/25	FedEx - Federal Express Tracking ID 771231387820 Shipped By Munsch Hardt, Munsch Hardt Kopf & Harr, 500. N Akard Lincoln Plaza, Suite 4000, DALLAS, TX 75201 to Heather Valentine, Munsch Hardt Kopf & Harr, 700 Milam Street, Suite 800, HOUSTON, TX 77002	56.50
01/06/25	FedEx - Federal Express Tracking ID 771231387831 Shipped By Munsch Hardt, Munsch Hardt Kopf & Harr, 500. N Akard Lincoln Plaza, Suite 4000, DALLAS, TX 75201 to Heather Valentine, Munsch Hardt Kopf & Harr, 700 Milam Street, Suite 800, HOUSTON, TX 77002	62.38
01/05/25	Julie M. Christensen - Airfare Ticket: J Christensen; Flight to Houston for Aztec deposition.; 01/07/2025 - 01/07/2025	329.48
01/01/25	Jamil N. Alibhai - Car Service/Taxi: J Alibhai; Uber from home to DFW Airport for flight to Houston for multiple depositions and depo prep sessions. 1/1	13.82
Total		\$40,723.22

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10549088
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

30 of 31
February 7, 2025

Cost Summary

<u>Description</u>	<u>Amount</u>
Travel Expenses	10,728.86
Parking/Cab/Mileage	526.90
Federal Express	192.16
Copies of Court Transcripts	2,555.00
Deposition	26,720.30
Total	\$40,723.22

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	Case Administration/Noticing	0.80	93.00
02	General Bankruptcy Advice/Opinions	7.00	950.00
07	Employment and Fee Applications	4.30	1,628.50
08	Asset Disposition	54.70	25,675.50
11	Plan and Disclosure Statement	1,122.10	635,244.50
Total		1,188.90	\$663,591.50

Outstanding Invoices

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Total Balance</u>
12/31/24	10546744	207,814.50	166,257.20	41,557.30
01/23/25	10548166	234,987.25	0.00	234,987.25
Total				\$276,544.55



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
Fax 214.855.7584
munsch.com

The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: February 7, 2025
Invoice Number: 10549088
Matter Number: 021990.00002

For Professional Services through January 31, 2025

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	663,591.50
Total Costs	\$	<u>40,723.22</u>
TOTAL THIS INVOICE	\$	704,314.72
Previous Balance	\$	<u>276,544.55</u>
Total Balance Due	\$	980,859.27

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.



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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: March 12, 2025
Invoice Number: 10552192
Matter Number: 021990.00002

For Professional Services through February 28, 2025

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	82,320.50
Total Costs	\$	<u>819.40</u>
TOTAL THIS INVOICE	\$	83,139.90
Previous Balance	\$	<u>221,044.10</u>
Total Balance Due	\$	304,184.00

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10552192
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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March 12, 2025

Fee Detail

Task Code: 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/04/25	HJV	Review invoice from Veritex regarding 11/21 auction. Email with S. Anders regarding status of payment. Email to Veritex regarding invoice.	0.20	43.00
Total for 01			0.20	43.00

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/11/25	BLF	Attend team WIP meeting.	0.50	300.00
02/11/25	ARP	Attend team meeting regarding outstanding case tasks and follow up items.	0.50	250.00
02/11/25	HJV	Working team meeting regarding sale, plan preparation, and next steps.	0.50	107.50
Total for 02			1.50	657.50

Task Code: 05 Cash Collateral and Postpetition Financing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/05/25	JDC	Communications with John Baumgartner and B. Funk regarding wind-down budgeting (.2). Analysis of fee estimation spreadsheet from Getzler (.1).	0.30	207.00
Total for 05			0.30	207.00

Task Code: 07 Employment and Fee Applications

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/05/25	HJV	Review January invoice (.8). Multiple emails with E. Pinales, K. Kraner, and team regarding the invoice and revisions to same (.1).	1.10	236.50
02/06/25	HJV	Review and revise January invoice (.5). Emails with E. Pinales regarding same (.1).	0.60	129.00
02/06/25	JDC	Attention to January fee notice and fee application preparation.	0.60	414.00
02/06/25	ARP	Revise Munsch Hardt's January invoice.	2.00	1,000.00
02/07/25	ARP	Correspond with A. Jimenez and M. Pena regarding Munsch Hardt's Fifth Monthly Fee Statement (.1); prepare Munsch Hardt's Sixth Monthly Fee Statement (.4); and correspond with C. Haddad and M. Pena regarding Munsch Hardt's Sixth Monthly Fee Statement (.1).	0.60	300.00
02/07/25	HJV	Emails with J. Cornwell, E. Pinales, and A. Perez regarding revisions to January invoice (.4). Prepare fee statement (.9).	1.30	279.50

Munsch Hardt Kopf & Harr, P.C.
 Matter Number: 021990.00002
 Invoice Number: 10552192
 Client: The Aztec Fund Holding, Inc.
 Matter Description: Chapter 11 Bankruptcy Cases

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 March 12, 2025

02/07/25	JDC	Final review and revision to sixth monthly fee statement, and related coordination with H. Valentine and A. Perez.	0.20	138.00
02/11/25	ARP	Correspond with A. Jimenez regarding Munsch Hardt's Fifth Monthly Fee Statement (.1); and correspond with J. Baumgartner regarding second interim fee application deadline (.1).	0.20	100.00
02/11/25	HJV	Prepare of second interim fee application.	0.90	193.50
02/12/25	HJV	Work on second interim compensation application.	3.00	645.00
02/17/25	HJV	Continue work on Munsch Hardt's second interim compensation application and order.	4.10	881.50
02/19/25	ARP	Draft Munsch Hardt's second interim fee application.	3.00	1,500.00
02/24/25	ARP	Correspond with C. Haddad and A. Jimenez regarding Munsch Hardt's sixth monthly fee statement (.1); and draft Munsch Hardt's second interim fee application (2.8).	2.90	1,450.00
02/24/25	HJV	Confer with A. Perez regarding revisions to second interim fee application (.1). Email to E. Pinales requesting LEDES data for November - January invoices (.1).	0.20	43.00
02/25/25	ARP	Revise Munsch Hardt's Second Interim Fee Application.	1.80	900.00
02/25/25	HJV	Prepare exhibits for Munsch Hardt's second interim fee application.	0.80	172.00
02/26/25	ARP	Revise draft Second Interim Fee Application.	2.20	1,100.00
02/27/25	JDC	Review and revise second fee application and supporting exhibits (.9). Coordination with H. Valentine regarding final review against invoices and to confirm proper fee calculations/summaries (.2).	1.10	759.00
02/27/25	HJV	Confer with J. Cornwell and B. Funk regarding second interim fee application.	0.20	43.00
02/28/25	HJV	Review and finalize Munsch Hardt's second interim compensation application, exhibits, and proposed order (1.0). Email to J. Whitworth regarding LEDES data (.1).	1.10	236.50
Total for 07			27.90	10,520.50

Task Code: 08 Asset Disposition

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/03/25	ARP	Correspond with E. Forsberg and B. Funk regarding water utility lien related to Pinnacle Park building.	0.30	150.00
02/03/25	BLF	Conference with A. Perez regarding status of water lien at Pinnacle Park.	0.10	60.00
02/03/25	JDC	Telephone conference with Charles Haddad regarding investor communications, providing updates following BANA negotiations, and discussing general strategy (.3). Conference with B. Funk regarding amended plan restructuring and other liquidation processes (.6). Communications with BANA counsel to schedule conference (.1). Conference with Tom Kiriakos, Lisa Holl Chang and B. Funk to discuss next steps and specific Aztec responses to settlement points (.4). Follow-	1.80	1,242.00

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10552192
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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March 12, 2025

		up strategy conference with B. Funk (.2). Analysis of Court's calendar and general preparation for upcoming status conference (.2).		
02/06/25	BLF	Conference with H. Valentine regarding DTC sale materials for use in upcoming pleadings.	0.20	120.00
02/06/25	HJV	Confer with B. Funk regarding DTC sale motion, order, forms, and filings.	0.20	43.00
02/07/25	ZAS	Corresponded with Alex Perez and Brenda Funk regarding the proposed sales of the remaining TAF properties.	0.20	110.00
02/11/25	ARP	Correspond with L. Holl Chang regarding follow up items related to asset sales (.8); phone conference with L. Holl Chang regarding same (.2); correspond with S. McGuire regarding collection of documents for broker connection checks (.2); and work sessions with Z. Schneider regarding asset sale issues (.4).	1.60	800.00
02/11/25	ZAS	Meeting with Alex Perez regarding the sale of the remaining properties (0.4). Prepared form deeds for the remaining three properties (0.5).	0.90	495.00
02/12/25	ARP	Correspond with L. Holl Chang providing follow up on asset sale issues.	0.30	150.00
02/13/25	ARP	Correspond with S. McGuire and L. Holl Chang regarding creditor list for broker connection checks.	0.20	100.00
02/14/25	JDC	Preliminary review of proposed sale motion and bidding procedures from BANA.	0.30	207.00
02/14/25	ARP	Correspond with J. Ryan and BANA team regarding coordination with Hines.	0.40	200.00
02/17/25	ARP	Phone conference with T. Kiriakos, L. Holl Chang, C. Shah, and J. Ryan and team regarding DC-area buildings and sale logistics (.6); correspond with A. Jimenez and T. Kiriakos regarding Hines property manager for Windward Oaks (.1); and prepare revisions to draft sale motion and proposed order (2.5).	3.20	1,600.00
02/18/25	ARP	Work session with Z. Schneider regarding intended sales process (.2); and further review of proposed sale motion and proposed order (.8).	1.00	500.00
02/19/25	JDC	Conference with B. Funk regarding draft sale procedures motion from BANA and proposed revisions to same.	0.20	138.00
02/19/25	BLF	Review sale motion and bid procedures draft (.6); conference with J. Cornwell regarding same (.2); conference with counsel for Inovalon regarding potential sale (.1).	0.90	540.00
02/19/25	ARP	Prepare final revisions to draft sale and bid procedure motion and proposed order.	2.30	1,150.00
02/20/25	BLF	Review and revise sale motion and related papers.	3.60	2,160.00
02/21/25	BLF	Review and revise sale motion and related papers to provide additional flexibility in sale timing process.	2.70	1,620.00
02/23/25	BLF	Review and revise sale motion and related papers and correspondence with Mayer Brown team regarding same.	1.00	600.00

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
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Client: The Aztec Fund Holding, Inc.
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02/24/25	ARP	Correspond with L. Holl Chang, L. Zicchinella, and Z. Schneider regarding requests for title commitments.	0.50	250.00
02/24/25	JDC	Analysis of email communications from Lisa Holl Chang regarding broker selection and other sale procedures matters.	0.10	69.00
02/25/25	JDC	Review of redline revisions to sale and bid procedures motions from Lisa Holl Chang.	0.40	276.00
02/25/25	ARP	Correspond with L. Zicchinella regarding title commitments for additional properties.	0.20	100.00
02/26/25	ARP	Multiple correspondences with L. Zicchinella, L. Holl Chang, and Z. Schneider regarding title commitment issues and updates.	0.80	400.00
02/26/25	HJV	Revise bidding procedures motion and order.	1.00	215.00
02/26/25	ZAS	Corresponded with Alex Perez regarding title's questions as to the allocation among the three properties and the title insurance premiums for the same.	0.20	110.00
02/27/25	JDC	Analysis of BANA revisions to bid procedures order (.1). Related coordination with B. Funk regarding finalization and filing same (.1).	0.20	138.00
02/27/25	HJV	Revise bid procedures motion and order (.7). Email redline changes to B. Funk regarding same (.1). Finalize same (.2). Communications with Stretto regarding service (.2).	1.20	258.00
Total for 08			26.00	13,801.00

Task Code: 11 Plan and Disclosure Statement

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/02/25	BLF	Review and perform claims analysis for potential plan voting (2.1); correspondence regarding same and next steps (.2).	2.30	1,380.00
02/03/25	BLF	Prepare proposal for BANA consideration and conferences with J. Cornwell regarding same and strategy (2.9); conference with counsel for BANA regarding plan proposal (.4).	3.30	1,980.00
02/04/25	BLF	Attend status conference and follow-up conference with Mayer Brown team (.7); conference with C. Haddad and J. Cornwell regarding options (.7).	1.40	840.00
02/04/25	JDC	Preparation for and attendance of status conference, including post-hearing communications with Charles Kelley and Brandon Renken (.7). Telephone conference with Charles Haddad following hearing regarding updates and strategy (.5). Conference with B. Funk regarding plan structure and strategy (.2).	1.40	966.00
02/04/25	ARP	Attend status conference (.1); and phone conference with M. Pena regarding case status (.1).	0.20	100.00
02/05/25	BLF	Review and revise fee estimate information (.2); conference with J. Cornwell and J. Baumgartner regarding fee estimates (.2); review correspondence from SPA and BANA and correspondence with client team regarding same (.3).	0.70	420.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10552192

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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02/05/25	JDC	Analysis of detailed email from Lisa Holl Chang relating to sale process and liquidation requirements (.3). Related email communication with team (.1). Analysis of letter from SPA (.2). Related email communication with client and team (.2).	0.80	552.00
02/05/25	ARP	Review correspondence from BANA.	0.30	150.00
02/06/25	BLF	Conference with J. Cornwell regarding plan strategy and upcoming conference (.5); conference with Mayer Brown regarding plan and cash collateral for plan process (.5); follow-up conference with J. Cornwell and J. Baumgartner regarding same (.3); consider options for new plan structure (.5); conference with J. Vasek regarding next steps on plan (.5).	2.50	1,500.00
02/06/25	JDC	Conference with B. Funk to discuss plan structure and timing in light of BANA sale preferences and requirements (.5). Conference with Mayer Brown team regarding plan structure and sales process (.5). Conference with John Baumgartner and B. Funk regarding wind-down budget, timing, and related issues (.3).	1.30	897.00
02/07/25	BLF	Coordination with J. Cornwell in advance of status conference (.2); prepare for and attend status conference (.5); follow-up conference with J. Cornwell regarding next steps (.2).	0.90	540.00
02/07/25	ARP	Attend status conference.	0.20	100.00
02/07/25	HJV	Numerous emails with B. Funk and L. Holl-Chang regarding DTC sale documents (.3). Gather DTC sale and closing documents (.9).	1.20	258.00
02/07/25	JDC	Telephone conference with Charles Haddad regarding recent communications with BANA team for liquidating plan and budgeting (.4). Email communication with John Baumgartner regarding management fee reduction (.1). Coordination with B. Funk in advance of status conference (.2). Preparation for and attendance of status conference (.5). Conference with B. Funk regarding strategy (.2).	1.40	966.00
02/10/25	BLF	Review prior filings in case in preparation for new plan process (1); correspondence with Mayer Brown regarding timing and consider same (.2).	1.20	720.00
02/10/25	JPV	Begin drafting new chapter 11 plan (0.8).	0.80	452.00
02/11/25	JDC	Communications and conference with team regarding various outstanding matters and strategy (.6). Analysis of wind-down budget and follow-up email communication to John Baumgartner (.3).	0.90	621.00
02/11/25	JPV	Participate in team meeting in connection with drafting plan (0.5). Telephone conference and numerous correspondence with B. Funk regarding same (0.8). Work on drafting consensual plan (2.4).	3.70	2,090.50

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10552192

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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02/12/25	BLF	Consider plan features and research language for same (2.4); conferences with J. Vasek regarding plan (.5); conference with J. Cornwell and A. Perez (in part) regarding plan strategy (.4); prepare for and attend conference with J. Baumgartner and J. Cornwell regarding wind-down budget for case (1); conference with Mayer Brown team and follow-up with J. Cornwell regarding same (.5).	5.10	3,060.00
02/12/25	HJV	Prepare binder with all schedules and statements and amendments thereto for B. Funk's review.	0.30	64.50
02/12/25	ARP	Case strategy work session with B. Funk regarding plan structure and related issues.	0.30	150.00
02/12/25	JDC	Conference with B. Funk regarding plan structure strategy, specifically including assessment and treatment of potential causes of action (.7). Conference with John Baumgartner and B. Funk regarding wind-down budget and other strategy (.9). Conference with Tom Kiriakos, Lisa Holl Chang, and B. Funk regarding plan structure and budgeting issues (.5). Follow-up conference with B. Funk regarding same (.2).	2.30	1,587.00
02/12/25	JPV	Work on drafting new chapter 11 plan (4.3). Multiple correspondence and telephone conference with B. Funk regarding same (0.5).	4.80	2,712.00
02/13/25	BLF	Conferences with J. Vasek regarding plan (.5); review and revise solicitation procedures and related materials (1.4).	1.90	1,140.00
02/13/25	JPV	Work on drafting new chapter 11 plan (3.0). Numerous correspondence and conferences with B. Funk regarding same (0.5).	3.50	1,977.50
02/14/25	BLF	Conferences with J. Vasek regarding plan structure.	0.50	300.00
02/14/25	JPV	Continue drafting second chapter 11 plan for the Debtors (6.2). Numerous correspondence with B. Funk regarding same (0.5).	6.70	3,785.50
02/15/25	JPV	Complete draft of plan and circulate to B. Funk and J. Cornwell for review (4.9).	4.90	2,768.50
02/17/25	BLF	Review and revise plan and disclosure statement.	4.90	2,940.00
02/17/25	JDC	Review of draft bankruptcy plan and disclosure statement (.3). Analysis of email from Tom Kiriakos regarding same and related internal communications (.2).	0.50	345.00
02/18/25	BLF	Attend to correspondence and conference with J. Cornwell regarding same (.2); conference with Mayer Brown team regarding revised plan (.6); conference with C. Haddad and J. Cornwell regarding same (.4); conference with J. Baumgartner regarding plan support (.1); review and revise solicitation procedures and related motion (1.7); research classification and secured claim analysis for revised plan (1.7).	4.70	2,820.00

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
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02/18/25	JDC	Email communications with Mayer Brown team regarding scheduling (.1). Analysis of email from Lisa Holl Chang relating to draft plan issues (.1). Conference with B. Funk regarding same (.2). Conference with Mayer Brown team regarding plan issues (.6). Analysis of follow-up email from Danielle Signal (.1). Telephone conference with Charles Haddad and B. Funk regarding NOL and reorganization issues (.7). Preparation of update and scheduling email to client team (.2).	2.00	1,380.00
02/19/25	BLF	Review plan structure options and research same (1.5); conference with J. Cornwell regarding same (.4).	1.90	1,140.00
02/19/25	JDC	Detailed plan revisions and strategy conference with B. Funk (.4). Email communications with Mayer Brown team regarding scheduling (.1).	0.50	345.00
02/20/25	JDC	Preparation for and attendance of conference with client team to discuss plan and sale motion deal points and timing (1.4). Conference with Tom Kiriakos, Lisa Holl Chang, and B. Funk to discuss plan revisions, sale motion considerations, and hearing timing (.4). Strategy conference with B. Funk and A. Perez (.2).	2.00	1,380.00
02/20/25	BLF	Conference with client team regarding BANA plan comments (1.4); conference with Mayer Brown team regarding sale and plan matters (.4); conference with A. Perez and J. Cornwell regarding same (.2).	2.00	1,200.00
02/20/25	ARP	Phone conference with C. Haddad and client group and other advisors regarding proposed plan and sales process issues.	1.40	700.00
02/23/25	BLF	Continue revisions to plan and disclosure statement to incorporate liquidation and expanded classification.	2.20	1,320.00
02/24/25	JDC	Telephone conference with Charles Haddad regarding updated plan formulation discussions with BANA team and general timing expectations.	0.30	207.00
02/24/25	BLF	Continue revisions to plan, disclosure statement, solicitation procedures motion and related materials.	3.60	2,160.00
02/25/25	JDC	Analysis of draft liquidating plan.	0.50	345.00
02/25/25	BLF	Continue revisions to plan, disclosure statement, solicitation procedures motion and related materials.	3.70	2,220.00
02/27/25	JDC	Email communication with Tom Kiriakos and B. Funk regarding plan revisions (.1). Analysis of BANA plan revisions (.8). Conference with B. Funk regarding same (.3). Telephone conference with Tom Kiriakos regarding same (.2). Telephone conference with Charles Haddad regarding plan revisions and strategy for responding to same (.4). Organization of conference with client representatives (.1). Follow-up communications with Charles Haddad and B. Funk regarding plan issues, including communications with NexBank (.5).	2.40	1,656.00

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
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02/27/25	BLF	Review BANA plan comments (.3); conferences and correspondence with J. Cornwell and T. Kiriakos regarding same (.4); conference with J. Baumgartner regarding plan administrator (.1); conferences with C. Haddad and J. Cornwell regarding analysis for going forward with Plan (.5).	1.30	780.00
02/28/25	JDC	Preparation for and attendance of conference with client team regarding BANA plan revisions, related options, and strategy moving forward (.9). Email communications with counsel for NexBank (.1). Conference with Jason Rudd, counsel for NexBank, and B. Funk to discuss anticipated plan filing (.2).	1.20	828.00
02/28/25	BLF	Review and revise plan of liquidation and disclosure statement (2.8); conference with client team regarding plan revisions (.9); conference with counsel for Nexbank regarding plan changes (.2).	3.90	2,340.00
Total for 11			93.80	56,183.50

Task Code: 14 Reporting/MORs

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/10/25	ARP	Multiple correspondences with J. Baumgartner regarding MORs and payment of UST fees (.4); conduct final review of Debtors' monthly operating reports (.6); and draft correspondence to G. Otto regarding filing of MORs and payment of UST fees (.2).	1.20	600.00
02/10/25	HJV	Finalize for filing the December monthly operating reports for each debtor.	1.20	258.00
02/12/25	ARP	Correspond with J. Baumgartner regarding US Trustee fee payments.	0.10	50.00
Total for 14			2.50	908.00
Total			152.20	\$82,320.50

Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	John D. Cornwell	JDC	690.00	22.70	15,663.00
Shareholder	Brenda L. Funk	BLF	600.00	57.00	34,200.00
Shareholder	Julian P. Vasek	JPV	565.00	24.40	13,786.00
Shareholder	Zachary (Zack) A. Schneider	ZAS	550.00	1.30	715.00
Senior Attorney	Alexander R. Perez	ARP	500.00	27.70	13,850.00
Paralegal	Heather J. Valentine	HJV	215.00	19.10	4,106.50
Total				152.20	\$82,320.50

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10552192
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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March 12, 2025

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
02/04/25	Veritext - Deposition - Transcript of Auction deposition taken 11/21/24	264.00
01/27/25	Secretary of State of Texas - Status Certificate - 1447073450002 - 1447073450003, TAF Pinnacle Park Land, LLC	15.00
01/24/25	Houston's Courier - Courier Service - 25-679601, To: United States Courthouse	127.80
01/24/25	Houston's Courier - Courier Service - 947936, From: U.S. Courthouse	102.80
01/17/25	SP Plus - Parking Validation - John Baumgarten, Aztec Bankruptcy (J. Cornwell)	20.00
01/17/25	Houston's Courier - Courier Service - 25-759673, From: Federal Courthouse	99.50
01/16/25	Houston's Courier - Courier Service - 947438, To: Mayer Brown	16.25
01/16/25	Houston's Courier - Courier Service - 9474380, From: Mayer Brown	16.25
01/16/25	Houston's Courier - Courier Service - 25-654294, To: United States District Courthouse	137.80
01/13/25	SP Plus - Parking Validation - John Baumgarten, Aztec Bankruptcy (J. Cornwell)	20.00
Total		\$819.40

Cost Summary

<u>Description</u>	<u>Amount</u>
Parking Validation	40.00
Status Certificate	15.00
Deposition	264.00
Courier Service	500.40
Total	\$819.40

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	Case Administration/Noticing	0.20	43.00
02	General Bankruptcy Advice/Opinions	1.50	657.50
05	Cash Collateral and Postpetition Financing	0.30	207.00

Munsch Hardt Kopf & Harr, P.C.
 Matter Number: 021990.00002
 Invoice Number: 10552192
 Client: The Aztec Fund Holding, Inc.
 Matter Description: Chapter 11 Bankruptcy Cases

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<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07	Employment and Fee Applications	27.90	10,520.50
08	Asset Disposition	26.00	13,801.00
11	Plan and Disclosure Statement	93.80	56,183.50
14	Reporting/MORs	2.50	908.00
Total		152.20	\$82,320.50

Outstanding Invoices

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Total Balance</u>
12/31/24	10546744	207,814.50	166,257.20	41,557.30
01/23/25	10548166	234,987.25	188,218.75	46,768.50
02/07/25	10549088	704,314.72	571,596.42	132,718.30
Total				\$221,044.10



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
Fax 214.855.7584
munsch.com

The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: March 12, 2025
Invoice Number: 10552192
Matter Number: 021990.00002

For Professional Services through February 28, 2025

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	82,320.50
Total Costs	\$	819.40
TOTAL THIS INVOICE	\$	83,139.90
Previous Balance	\$	221,044.10
Total Balance Due	\$	304,184.00

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: April 7, 2025
Invoice Number: 10554037
Matter Number: 021990.00002

*For Professional Services through **March 31, 2025***

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	45,067.00
Total Costs	\$	<u>78.08</u>
TOTAL THIS INVOICE	\$	45,145.08
Previous Balance	\$	<u>16,464.10</u>
Total Balance Due	\$	61,609.18

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

Munsch Hardt Kopf & Harr, P.C.
 Matter Number: 021990.00002
 Invoice Number: 10554037
 Client: The Aztec Fund Holding, Inc.
 Matter Description: Chapter 11 Bankruptcy Cases

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Fee Detail

Task Code: 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/04/25	HJV	Prepare and finalize notice of filing master service list.	0.20	43.00
03/17/25	ARP	Correspond with A. Galvan regarding subscription list issues.	0.20	100.00
03/20/25	HJV	Confer with A. Perez regarding status of due diligence request.	0.10	21.50
03/25/25	ARP	Multiple correspondences with A. Blanadet regarding service of bidding procedures order and sales related notice.	0.40	200.00
03/29/25	HJV	Update docket with recent filings (.4). Attention to dates and deadlines relating to solicitation motion and bid procedures order (.5).	0.90	193.50
Total for 01			1.80	558.00

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/06/25	ARP	Correspond with G. Otto, A Jimenez, and B. Funk regarding Debtors' insurance policies (.3); and review correspondence from D. Etges and A. Jimenez regarding continued receipts of DTC rent (.2).	0.50	250.00
03/10/25	ARP	Correspond with A. Jimenez and G. Otto regarding insurance certificates (.3); review Debtors' insurance certificates (.4); correspond with D. Etges, A. Jimenez, and J. Baumgartner regarding issues related to receipt of certain DTC rents (.5); and review correspondence containing proposed sale and confirmation timeline and related details (.2).	1.40	700.00
03/11/25	ARP	Correspond with A. Jimenez and J. Baumgartner regarding issues related to receipt of certain DTC rents (.3).	0.30	150.00
03/12/25	ARP	Multiple correspondences with A. Jimenez, J. Cruciani, M. Preter, and B. Semien regarding issues related to turnover of DTC rents.	1.00	500.00
03/27/25	ARP	Correspond with C. Haddad regarding insurance settlement parameters.	0.30	150.00
03/28/25	ARP	Revise draft 9019 motion and settlement agreement related to Pinnacle Park insurance settlement.	2.20	1,100.00
Total for 02			5.70	2,850.00

Task Code: 05 Cash Collateral and Postpetition Financing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/13/25	BLF	Correspondence with J. Baumgartner regarding interest payments owed to BANA (.1); conference with H. Valentine regarding draft amendment to cash collateral order (.1).	0.20	120.00
03/13/25	HJV	Draft stipulation/amendment to final cash collateral order.	0.70	150.50

Munsch Hardt Kopf & Harr, P.C.
 Matter Number: 021990.00002
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 Client: The Aztec Fund Holding, Inc.
 Matter Description: Chapter 11 Bankruptcy Cases

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03/17/25	JDC	Communication with John Baumgartner regarding budget revisions (.1). Analysis of amended draft to cash collateral order and related correspondence to BANA team (.2).	0.30	207.00
03/17/25	BLF	Draft, review and revise amendment to cash collateral order (1.1); correspondence with Mayer Brown regarding same (.1); review budget and correspondence with J. Baumgartner regarding same (.2).	1.40	840.00
03/18/25	JDC	Analysis of BANA comments to amended cash collateral order draft (.1). Analysis of updated budget from John Baumgartner and related communication with B. Funk (.2).	0.30	207.00
03/18/25	BLF	Review draft budget and correspondence with J. Cornwell and J. Baumgartner regarding same.	0.30	180.00
03/20/25	JDC	Communications with team regarding finalizing revised cash collateral budget (.2). Related email communications with John Baumgartner (.1).	0.30	207.00
03/20/25	BLF	Review changes from Mayer Brown to cash collateral order and send to J. Baumgartner for review. Conferences with A. Perez regarding next steps.	0.50	300.00
03/21/25	BLF	Review and revise proposed cash collateral order (.2); conference with J. Baumgartner regarding same (.2); transmit same to Mayer Brown for review and approval to file (.1).	0.50	300.00
Total for 05			4.50	2,511.50

Task Code: 07 Employment and Fee Applications

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/25	HJV	Review, revise and finalize Getzler Henrich's second interim fee application (1.3). Email with Stretto regarding same of same (.1).	1.40	301.00
03/03/25	JDC	Coordination with John Baumgartner regarding finalization and filing fee application (.1); review of same and coordination of filing with H. Valentine (.3).	0.40	276.00
03/10/25	HJV	Prepare seventh monthly fee statement.	0.30	64.50
03/10/25	HJV	Confer with A. Perez regarding February fee statement.	0.10	21.50
03/11/25	JDC	Preliminary review of broker retention applications from Lisa Holl Chang (.3).	0.30	207.00
03/11/25	BLF	Review draft papers for broker retention and correspondence with L. Holl Change regarding same.	0.20	120.00
03/11/25	HJV	Review February invoice (.5). Email to E. Pinales regarding revisions (.1).	0.60	129.00
03/12/25	ARP	Revise Munsch Hardt's invoice for February 2025 (.8); review Munsch Hardt's seventh monthly fee statement (.3); and draft correspondences to A. Jimenez, C. Haddad, T. Kiriakos and other notice parties regarding monthly fee statement (.1).	1.20	600.00
03/12/25	HJV	Revise February invoice and email to E. Pinales regarding same (.1). Revise and finalize seventhly monthly fee statement and invoice (.5).	0.60	129.00

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
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April 7, 2025

03/13/25	BLF	Review Eastdil papers and correspondence regarding same (.2).	0.20	120.00
03/16/25	BLF	Correspondence with H. Valentine regarding cost billing matter.	0.10	60.00
03/17/25	JDC	Communication with team and client regarding broker retention and listing agreement (.1); review of listing agreement (.1). Analysis of revisions from B. Funk to Windward Oaks broker retention application (.1). Related email communication with Lisa Holl Chang (.1). Analysis of Eastdil brokers agreement for Bowie and Mark Center from BANA (.2).	0.60	414.00
03/17/25	HJV	Forward retention letters to Charles Haddad for signature for the Mark Center, Bowie and Windward Oaks properties.	0.10	21.50
03/18/25	BLF	Attend to signed copies of broker engagement agreements.	0.10	60.00
03/18/25	HJV	Review executed listing/broker agreements and forward same to L. Holl-Chang.	0.10	21.50
03/18/25	JDC	Analysis of executed brokerage agreements from Aztec (.1). Analysis of Eastdil's comments to retention application from Lisa Holl Chang and related email communication (.2).	0.30	207.00
03/20/25	HJV	Confer with A. Perez regarding retention applications to file.	0.10	21.50
03/21/25	ARP	Final review and revisions to the Eastdil and Cushman & Wakefield broker employment applications.	2.50	1,250.00
03/21/25	HJV	Revise the retention applications for Cushman & Wakefield and Eastdil Secured LLC (2.0). Organize and finalize exhibits thereto (.8). Confer with A. Perez regarding declarations and revisions to the applications (.2). Finalize the retention applications and exhibits for filing (.4). Coordinate with Stretto regarding service (.1).	3.50	752.50
03/24/25	HJV	Prepare certificate of no objection for the second interim fee application of Munsch Hardt (.5). Prepare certificate of no objection for the second interim fee application of Getzler Henrich (.5). Finalize for filing (.2). Email to case manager regarding same (.1).	1.30	279.50
03/24/25	ARP	Review orders authorizing retention of Eastdil and Cushman & Wakefield (.2); correspond with M. Millard regarding entry of Cushman & Wakefield's retention order (.2); correspond with B. Allen regarding entry of Eastdil's retention order (.2); correspond with J. Baumgartner regarding objection deadline and planned CNO on Getzler Henrich's second interim fee application (.2).	0.80	400.00
03/25/25	ARP	Finalize certificate of no objection for Getzler Henrich's second interim fee application (.4); correspond with R. Saldana regarding filing of certificate of no objection for Getzler Henrich's second interim fee application (.2); review orders on second interim fee applications of Munsch Hardt and Getzler Henrich (.1); and correspond with C. Haddad and A. Jimenez regarding entry of second interim fee application orders (.2).	0.90	450.00

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03/27/25	ARP	Correspond with A. Jimenez regarding Munsch Hardt's seventh monthly fee statement.	0.10	50.00
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Total for 07	15.80	5,955.50
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Task Code: 08 Asset Disposition

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/05/25	ZAS	Review the title commitment and exception documents for the Alexandria, VA property.	0.70	385.00
03/06/25	ARP	Correspond with S. Cheung regarding title policies (.2); and review title policies for three assets to be sold (1.5).	1.70	850.00
03/07/25	ZAS	Review the title commitment and exception documents for the Alpharetta, GA property (1.0). Review the title commitment and exception documents for the Bowie, MD property (0.7).	1.70	935.00
03/07/25	ARP	Correspond with Z. Schneider regarding title commitments.	0.40	200.00
03/11/25	JDC	Communications with BANA team regarding rescheduling of upcoming hearing and related sale timing coordination (.1). Attention to email communications with case manager regarding hearing change (.1).	0.20	138.00
03/11/25	ZAS	Discuss the preliminary title commitments with Alex Perez and items in the same for title and Sellers to address.	0.40	220.00
03/11/25	ARP	Discussion with Z. Schneider regarding title commitments (.4); draft correspondence to S. Lang providing comments on title commitments (.4); review draft broker retention applications and form purchase and sale agreements (.9); and correspond with Z. Schneider regarding draft PSAs (.1).	1.80	900.00
03/12/25	BLF	Multiple correspondence with L. Hill Chang and court staff regarding rescheduling hearing on bid procedures.	0.50	300.00
03/12/25	ARP	Correspond with S. Lang regarding title commitments (.3); and review correspondence from Z. Schneider providing comments to PSAs (.4).	0.70	350.00
03/12/25	ZAS	Review the revisions to the draft purchase and sale agreements provided by BANA and prepared comments to the same.	0.60	330.00
03/12/25	HJV	Prepare notice of rescheduled hearing (.4). Prepare notice of sale hearing on Mark Center, Bowie, and Windward Oaks (.5). Multiple mails with B. Funk and BANA team regarding rescheduling hearings on bid procedures motion and motion to lift stay (.1). Attention to calendaring rescheduled hearing dates (.1).	1.10	236.50
03/13/25	BLF	Conference with Mayer Brown team regarding status (.2); attend to correspondence with Hines (.1); correspondence with A. Perez regarding comments to PSA and other matters related to sale (.2).	0.50	300.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10554037

Client: The Aztec Fund Holding, Inc.

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03/13/25	ARP	Correspond with B. Funk and Z. Schneider regarding PSA issues (.8); multiple correspondences with B. Allen, C. Shah, L. Holl Chang, and L Channell regarding introductions between brokers and Hines (.6); review diligence requests for three properties circulated by L. Holl Chang (.6); and correspond with H. Valentine regarding diligence requests (.2).	2.20	1,100.00
03/13/25	JDC	Conference with Tom Kiriakos, Lisa Holl Chang and B. Funk regarding sale procedures and relevant dates/deadlines (.3). Email communication with Lisa Holl Chang and brokers regarding introductions and access to the properties (.1).	0.40	276.00
03/14/25	JDC	Conference with B. Funk regarding sale process timing and discussions with Lisa Holl Chang (.2). Analysis of various related email communications with BANA team and broker Eastdil (.1).	0.30	207.00
03/14/25	HJV	Gather documents in response to due diligence requests for Mark Center and Bowie properties.	1.40	301.00
03/16/25	ARP	Correspond with A. Jimenez regarding Phase 1 environmental reports.	0.10	50.00
03/17/25	JDC	Email communication with BANA team regarding title commitments and other matters relating to Bowie (.1).	0.10	69.00
03/17/25	BLF	Review and revise real estate related documents (.5); correspondence with Mayer Brown and client regarding same (.1); conference with Mayer Brown regarding scheduling matters (.3).	0.90	540.00
03/17/25	ARP	Correspond with L. Holl Chang regarding title commitments and diligence items.	0.50	250.00
03/18/25	JDC	Analysis of email communications with BANA and Hines regarding property tour with broker (.1). Attention to phase 1 assessment transmittals from A. Perez to BANA team (.1).	0.20	138.00
03/18/25	ARP	Correspond with A Jimenez and L. Holl Chang regarding phase 1 environmental assessments (.3); and correspond with J. Gibbs regarding insurance settlement (.2).	0.50	250.00
03/19/25	JDC	Analysis of completed Windward Oaks listing agreement from Danielle Sigal (.1). Attention to email from Rosario Saldana regarding hearing expectations and confer with team regarding same (.1).	0.20	138.00
03/20/25	JDC	Attention to email from Lisa Holl Chang coordinating various property sale questions and group conference call (.1). Analysis of email from BANA relating to due diligence request from Cushman (.2). Analysis of update email from A. Perez following call with Lisa Holl Chang and outlining status and go-forward issues (.1).	0.40	276.00
03/20/25	ARP	Phone conference with L. Holl Chang regarding asset sale issues and outstanding items in advance of hearing (.4); review agenda for hearing on bid procedures motion (.2); work session regarding coordination and collection of documents for assets sales and outstanding tasks (2.2); correspond with L. Holl Chang regarding follow up items from	4.40	2,200.00

Munsch Hardt Kopf & Harr, P.C.
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April 7, 2025

		phone conference (.2); correspond with L. Channell and A. Jimenez regarding collection of diligence documents for Windward Oaks (.3); and multiple correspondences with J. Cornwell and B. Funk regarding providing updates and recommendations regarding assets sales and communications with counsel for Bank of America (1.1).		
03/21/25	JDC	Analysis of email from Lisa Holl Chang providing updates to proposed sale and confirmation timing schedule (.1). Attention to email communication with case manager regarding hearing scheduling (.1).	0.20	138.00
03/21/25	ARP	Phone conference with L. Channell and A. Jimenez regarding diligence items for Windward Oaks (.5); review phase 1 environmental questionnaire and document request for Windward Oaks (.3); correspond with L. Holl Hang regarding same (.1); multiple correspondences with L. Channell, M. Millard, and A. Jimenez regarding diligence items and checklists for Windward Oaks (.8); and correspond with C. Shah, K. Chang, and A. Jimenez regarding diligence items for Bowie and Mark Center (.3).	2.00	1,000.00
03/21/25	HJV	Continue working on due diligence requests.	0.40	86.00
03/24/25	BLF	Prepare for and attend hearing on bidding procedures and scheduling matters (1); conferences with J. Cornwell regarding maximizing proceeds and qualifying bids (.3); conference with C. Haddad and J. Cornwell following hearing (.3); follow-up conference with C. Haddad and accountant for company (.1); review and revise procedures and proposed order following hearing and coordinate filing with H. Valentine (.9).	2.40	1,440.00
03/24/25	ZAS	Review correspondence with title regarding the proposed revisions to the bankruptcy requirements in the title commitment for the Bowie, MD property.	0.20	110.00
03/24/25	HJV	Emails with Larry Channel with Hines, Amanda Jimenez, and C. Lujano regarding due diligence documents needed (.3). Review and download all documentation received from Hines relating to due diligence (.3).	0.60	129.00
03/24/25	JDC	Preparation for and attendance of hearing on sale motions and broker applications (.8). Coordination with B. Funk regarding revisions to sale order and strategy relating to minimum bid amounts, including possible insider bid participation (.2). Related update conference with Charles Haddad (.3). Follow-up email communications with BANA team regarding finalizing proposed orders and schedule (.1). Analysis of various related filings (.2).	1.60	1,104.00
03/24/25	ARP	Correspond with S. Lang and L. Holl Chang regarding revisions to Bowie title commitment.	0.30	150.00
03/25/25	BLF	Consider next steps in sale process and correspondence with A. Perez regarding same (.1); correspondence with Mayer Brown team regarding next steps in process (.1).	0.20	120.00
03/25/25	ZAS	Review correspondence from Mayer Brown regarding the property diligence items.	0.40	220.00

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03/25/25	ARP	Review revised title commitment for Bowie property (.4); correspond with S. Lang regarding revised title commitment for Bowie property (.4); correspond with L. Channell regarding diligence item collection (.3); correspond with L. Holl Chang regarding sales notice issue (.3); review bidding procedures order entered by court (.4); prepare sales notice and bidding procedures in accordance with bidding procedures order (2.7); correspond with B. Allen and M. Millard regarding entry of bidding procedures order, sales notice, and bidding procedures (1.2); review ALTA documents circulated by D. Sigal (.4); and correspond with Z. Schneider regarding ALTA survey issue (.2).	6.30	3,150.00
03/26/25	ARP	Phone conference with M. Millard and Cushman team regarding sales process and diligence items (.3); review diligence documents collected by Hines and the Debtors' management (2.7); work session with C. Lujano regarding transmission of diligence documents (.2); correspond with D. Sigal following up on diligence items and related issues (.3); correspond with L. Holl Chang providing comments to PSAs (.6)	4.10	2,050.00
03/26/25	JDC	Email communications with Charles Haddad regarding auction participation issue (.2). Analysis of various email communications regarding broker tours (.1).	0.30	207.00
03/27/25	ARP	Review correspondence from L. Holl Chang and M. Howes regarding comments to PSAs (.4); review diligence items for Windward Oaks (.5); and multiple correspondences with A. Simon, L. Channell, A. Jimenez, and M. Millard regarding diligence items and requests related to Windward Oaks (1.4).	2.30	1,150.00
03/28/25	ARP	Work session with Z. Schneider regarding sales timeline and tasks (.3); multiple correspondences with M. Millard, A. Jimenez, and L. Channell regarding diligence items for Windward Oaks (.9); correspond with B. Allen regarding diligence items for Mark Center and Bowie (.2); and review diligence items collected by Hines and Aztec management (1.3).	2.70	1,350.00
03/28/25	ZAS	Confer with A. Perez regarding the status and timing of the dispositions and the property documents provided by Mayer Brown.	0.30	165.00
03/31/25	ARP	Phone conference with L. Holl Chang regarding asset sales (.2); and work session regarding collection and transmittal of diligence documents to brokers (.4).	0.60	300.00

Total for 08 46.80 23,808.50

Task Code: 11 Plan and Disclosure Statement

Munsch Hardt Kopf & Harr, P.C.
 Matter Number: 021990.00002
 Invoice Number: 10554037
 Client: The Aztec Fund Holding, Inc.
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 April 7, 2025

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/02/25	BLF	Continue edits to plan and disclosure statement and transmit same to Mayer Brown for review.	0.50	300.00
03/03/25	JDC	Communications with B. Funk and Lisa Holl Chang regarding hearing scheduling.	0.10	69.00
03/04/25	BLF	Review and revise solicitation procedures and related materials (2.3); conference with J. Cornwell regarding same and scheduling (.2); review correspondence with Mayer Brown regarding same (.1).	2.60	1,560.00
03/04/25	JDC	Coordination with B. Funk regarding status of plan revisions and solicitation procedure motion finalization (.2). Email communications with BANA team regarding updates and scheduling (.1).	0.30	207.00
03/05/25	BLF	Further review and revisions to solicitation materials (.7); conference with C. Haddad and J. Cornwell regarding status of board approval (.1).	0.80	480.00
03/05/25	JDC	Communication with Charles Haddad and B. Funk regarding plan status and approval.	0.10	69.00
03/06/25	BLF	Telephone conference with J. Cornwell regarding plan language and timing for filing (.3); conference with C. Haddad and J. Cornwell regarding same (.3); correspondence with Mayer Brown team regarding scheduling (.1).	0.70	420.00
03/06/25	JDC	Telephone conference with B. Funk regarding plan formulation and timing strategies (.3). Conference with C. Haddad and B. Funk regarding board discussions and plan approval (.3). Email communications with BANA team regarding scheduling (.1).	0.70	483.00
03/10/25	BLF	Prepare for and attend conferences with J. Cornwell and Mayer Brown team with update on timing of sale and plan filing (.6); prepare final changes to solicitation motion materials and transmit same for review (.6).	1.20	720.00
03/10/25	JDC	Conference with Tom Kiriakos, Lisa Holl Chang, and B. Funk regarding sale process update, plan/DS finalization, and confirmation scheduling (.2). Review of revised solicitation procedures and motion (.2). Analysis of email communication from BANA regarding revised confirmation and sale timeline (.1). Communication with A. Perez regarding status and next steps (.1).	0.60	414.00
03/12/25	JDC	Coordination with B. Funk and H. Valentine regarding hearing rescheduling and upcoming filings (.1). Related communications with Rosario Saldana and BANA team (.1). Analysis of comments to solicitation procedures from Danielle Sigal (.1). Scheduling communications with BANA team regarding plan and sale matters (.1).	0.40	276.00
03/19/25	BLF	Consider correspondence from court regarding hearing.	0.10	60.00
03/20/25	HJV	Prepare agenda for 3/24 hearing.	0.40	86.00

Munsch Hardt Kopf & Harr, P.C.
 Matter Number: 021990.00002
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03/21/25	BLF	Review revised draft of solicitation materials and make additional changes (.7); circulate to Mayer Brown team for review (.1); correspondence with Court staff regarding hearing for disclosure statement (.1); Review and revise Plan to conform comments (.6); transmit same for Mayer Brown review (.1).	1.60	960.00
03/21/25	JDC	Analysis of revisions to plan and cash collateral order from B. Funk (.3). Email communication with BANA team regarding same (.1). Preliminary analysis of solicitation procedures and related document revisions from B. Funk (.2). General strategy and timing coordination with B. Funk (.1).	0.70	483.00
03/21/25	HJV	Revise Agenda and finalize for filing.	0.10	21.50
03/23/25	BLF	Prepare materials for filing and correspondence with H. Valentine regarding same.	0.40	240.00
03/24/25	BLF	Final review and coordinate plan and solicitation procedures for filing.	1.10	660.00
03/24/25	HJV	Prepare hearing binder for status conference (.6). Attention to entering electronic appearances for B. Funk and J. Cornwell (.1). Revise disclosure statement and plan (.5). Revise and finalize amendment to cash collateral (.3). Email to BANA team requesting authorization to file (.1). Email to Stretto regarding upcoming filings and service (.1). Finalize for filing disclosure statement and plan (1.1). Finalize for filing amendment to cash collateral order (.2). Revise and finalize for filing bid procedures order (.3). Revise and finalize for filing solicitation motion and order (.7).	4.00	860.00
Total for 11			16.40	8,368.50

Task Code: 13 Business Operations

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/05/25	BLF	Correspondence with A. Jimenez and J. Baumgartner regarding payments.	0.10	60.00
03/06/25	BLF	Correspondence with A. Jimenez and A. Perez regarding insurance policies and rent received for sold property.	0.20	120.00
03/18/25	BLF	Correspondence with A. Jimenez regarding interest payments for BANA.	0.10	60.00
03/21/25	BLF	Correspondence with A. Jimenez regarding payment for vendor.	0.10	60.00
Total for 13			0.50	300.00

Task Code: 14 Reporting/MORs

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/11/25	ARP	Review draft MORs for January 2025 (.9); and correspond with B. Kim and H. Valentine regarding same (.1).	1.00	500.00
03/12/25	HJV	Finalize for filing monthly operating reports for January 2025 for each debtor entity.	1.00	215.00
Total for 14			2.00	715.00
Total			93.50	\$45,067.00

Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	John D. Cornwell	JDC	690.00	9.30	6,417.00
Shareholder	Brenda L. Funk	BLF	600.00	17.50	10,500.00
Shareholder	Zachary (Zack) A. Schneider	ZAS	550.00	4.30	2,365.00
Senior Attorney	Alexander R. Perez	ARP	500.00	43.40	21,700.00
Paralegal	Heather J. Valentine	HJV	215.00	19.00	4,085.00
Total				93.50	\$45,067.00

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/01/25	1.95 GB Active for March - Data Hosting Service (CS Disco)	39.04
02/01/25	1.95 GB Active for February - Data Hosting Service (CS Disco)	39.04
Total		\$78.08

Cost Summary

<u>Description</u>	<u>Amount</u>
Data Hosting Service	78.08
Total	\$78.08

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Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	Case Administration/Noticing	1.80	558.00
02	General Bankruptcy Advice/Opinions	5.70	2,850.00
05	Cash Collateral and Postpetition Financing	4.50	2,511.50
07	Employment and Fee Applications	15.80	5,955.50
08	Asset Disposition	46.80	23,808.50
11	Plan and Disclosure Statement	16.40	8,368.50
13	Business Operations	0.50	300.00
14	Reporting/MORs	2.00	715.00
Total		93.50	\$45,067.00

Outstanding Invoices

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Total Balance</u>
03/12/25	10552192	83,139.90	66,675.80	16,464.10
Total				\$16,464.10



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
Fax 214.855.7584
munsch.com

The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: April 7, 2025
Invoice Number: 10554037
Matter Number: 021990.00002

*For Professional Services through **March 31, 2025***

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	45,067.00
Total Costs	\$	78.08
TOTAL THIS INVOICE	\$	45,145.08
Previous Balance	\$	16,464.10
Total Balance Due	\$	61,609.18

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.



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500 N. Akard Street, Suite 4000
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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: May 7, 2025
Invoice Number: 10556738
Matter Number: 021990.00002

For Professional Services through April 30, 2025

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	40,810.50
Total Costs	\$	39.04
TOTAL THIS INVOICE	\$	40,849.54
Previous Balance	\$	25,477.50
Total Balance Due	\$	66,327.04

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

Munsch Hardt Kopf & Harr, P.C.
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Fee Detail

Task Code: 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/04/25	HJV	Update docket with recent filings.	0.10	21.50
04/23/25	HJV	Prepare spreadsheet calendar to track upcoming deadlines per B. Funk's request.	0.50	107.50
Total for 01			0.60	129.00

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/07/25	ARP	Prepare final revisions to 9019 insurance settlement motion and settlement agreement (2.0); and correspond with C. Haddad providing analysis and requesting approval of same (.3).	2.30	1,150.00
04/08/25	ARP	Correspond with J. Gibbs and L. Holl Chang regarding revised 9019 insurance settlement motion and settlement agreement.	0.60	300.00
04/10/25	ARP	Correspond with J. Gibbs and L. Holl Chang regarding insurance settlement related to TAF Pinnacle Park and 9019 motion.	0.40	200.00
04/15/25	ARP	Phone conference with S. Gibbs regarding insurance settlement logistics and issues (.2); correspond with A. Jimenez regarding insurance policy (.2); review and analyze insurance policy (.4); correspondence from D. Sigal regarding insurance policy (.1); and correspond with A. Jimenez regarding insurance policy (.3).	1.10	550.00
04/16/25	ARP	Correspond with A. Jimenez regarding issues related to receipt of DTC rents (.2); correspond with J. Cruciani and M. Preter regarding continued receipt of rent funds by DTC debtor (.5); correspond with D. Etges regarding DTC water bill issue (.1); conduct investigation of DTC water bill issue including review of sale documents (1.3); multiple correspondences with Z. Schneider regarding DTC water bill issue (.7); and correspond with A. Jimenez regarding DTC water bill issue (.2).	3.00	1,500.00
04/17/25	HJV	Confer with A. Perez regarding DTC water bill (.1). Review monthly operating reports for any references to credits from or checks paid to Denver Water (.5).	0.60	129.00
04/17/25	ARP	Multiple correspondences with A. Jimenez and H. Valentine regarding DTC water bill issue (.3); multiple correspondences with A. Jimenez and J. Baumgartner regarding internal transfer issue (.2); and review correspondence from D. Sigal regarding 9019 motion and proposed insurance settlement (.2).	0.70	350.00
04/22/25	ARP	Correspond with J. Cruciani regarding DTC rent payment issue (.1); and correspond with C. Haddad regarding issues related to Pinnacle Park insurance settlement (.3).	0.40	200.00

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04/23/25	ARP	Correspond with D. Sigal and J. Gibbs regarding Pinnacle Park insurance settlement issues (.7); and work session regarding revisions to 9019 motion and settlement agreement to incorporate comments from Bank of America (.8).	1.50	750.00
04/28/25	ARP	Prepare revisions to 9019 insurance settlement motion (.5); and correspond with D. Sigal regarding status of same (.1)	0.60	300.00
04/29/25	ARP	Prepare further revisions to draft insurance settlement 9019 motion and settlement agreement (.9); and draft correspondence to D. Sigal regarding same (.3).	1.20	600.00
Total for 02			12.40	6,029.00

Task Code: 07 Employment and Fee Applications

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/03/25	HJV	Review and revise draft invoice for March (.6). Emails with E. Pinales regarding revisions (.1).	0.70	150.50
04/04/25	HJV	Prepare Munsch Hardt's eighth monthly fee statement.	0.70	150.50
04/07/25	ARP	Revise Munsch Hardt's invoice for March 2025 (.8); review Munsch Hardt's eighth monthly fee statement (.3); draft correspondences to A. Jimenez, C. Haddad, T. Kiriakos and other notice parties regarding monthly fee statement (.1); and follow up correspond with A. Jimenez regarding monthly fee statement (.1).	1.30	650.00
04/07/25	HJV	Revise eighth monthly fee statement (.3). Emails with A. Perez and E. Pinales regarding same (.1).	0.40	86.00
04/22/25	ARP	Correspond with A. Jimenez regarding Munsch Hardt's Eighth Monthly Fee Statement.	0.10	50.00
04/23/25	ARP	Correspond with A. Jimenez regarding Munsch Hardt's Eighth Monthly Fee Statement.	0.10	50.00
04/30/25	HJV	Prepare ninth monthly fee statement for Munsch Hardt.	0.20	43.00
Total for 07			3.50	1,180.00

Task Code: 08 Asset Disposition

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/01/25	ARP	Review revised title commitment for Bowie (.4); correspond with S. Lang regarding revised title commitment for Bowie (.2); correspond with A. Jimenez and C. Haddad regarding certain lease provisions (.2); and correspond with L. Holl Chang and D. Sigal regarding insurance certificates and title commitments (.4).	1.20	600.00
04/01/25	JDC	Coordinating communications with Troutman Pepper attorneys regarding CHEP inquiries relating to the sale process.	0.10	69.00
04/02/25	BLF	Call with counsel for CHEP and MHKH team regarding sales process.	0.20	120.00

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04/02/25	ARP	Phone conference with S. Mayer, J. Cornwell, and B. Funk regarding Windward Oaks sales process (.2); correspond with D. Sigal regarding draft confidentiality agreements (.1); and correspond with A. Jimenez, L. Holl Chang regarding free rent issue (.3).	0.60	300.00
04/02/25	JDC	Conference with Simon Mayer, counsel for CHEP, regarding sale process (.2).	0.20	138.00
04/03/25	JDC	Analysis of Bowie and Mark Center email teasers from Eastdil team (.2). Attendance of Eastdil and BANA meeting regarding sale process coordination (.4). Post-conference strategy meeting with A. Perez regarding confidentiality agreement review, client coordination, and related strategy (.3).	0.90	621.00
04/03/25	ARP	Call with L. Holl Chang and related review of agenda for call with Eastdil (.2); phone conference with B. Allen and other Eastdil representatives, L. Holl Chang and BANA representatives, and J. Cornwell (.5); review draft email marketing teasers for Bowie and Mark Center (.5); multiple correspondences with C. Haddad regarding asset sales process (.6); phone conference with C. Haddad regarding case status and sales process (.7); correspond with J. Bakshi providing comments to draft email marketing teasers for Bowie and Mark Center (.1); review confidentiality agreement for Eastdil and Cushman & Wakefield (1.5); correspond with D. Sigal regarding comments to Cushman & Wakefield confidentiality agreement (.1); work session with J. Cornwell regarding sales processes (.3).	4.50	2,250.00
04/04/25	JDC	Various email communications with Eastdil and Lisa Holl Chang regarding listing notice revisions.	0.20	138.00
04/04/25	ARP	Conduct final review of Eastdil confidentiality agreements (.9); multiple correspondences with L. Holl Chang and D. Sigal regarding same (.4); correspond with L. Holl Chang and D. Meline regarding sample offering memorandum (.4); conduct final review of draft email marketing teasers for Bowie and Mark Center (.9); and correspond with J. Bakshi providing further comments to draft email marketing teasers for Bowie and Mark Center (.2).	2.80	1,400.00
04/06/25	ARP	Review final confidentiality agreements for Eastdil circulated by J. Bakshi.	0.30	150.00
04/07/25	JDC	Various communications with Eastdil and BANA regarding finalizing Mark Center and Bowie listings (.2). Conference with A. Perez regarding same (.1).	0.30	207.00
04/07/25	ARP	Review correspondence and circulars related to Bowie and Mark Center (.6); multiple correspondences with J. Bakshi regarding same (.3); phone conference with B. Allen resolving final issues and comments to Bowie circular (.1); conduct final review of the Bowie and Mark Center PSAs (.3); correspond with B. Allen noting the Debtors' approval of same (.1); conduct final review of the Cushman and Wakefield confidentiality agreement (.6); and correspond with L. Holl Chang regarding comments on same (.2).	2.20	1,100.00

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04/08/25	ARP	Phone conference with M. Millard regarding lease related issues (.4); work session with J. Cornwell regarding lease related issues (.2); work sessions with H. Valentine regarding collection and production of additional diligence documents to brokers (1.1); and review additional diligence documents to be provided to brokers (1.5).	3.00	1,500.00
04/08/25	HJV	Confer with A. Perez regarding due diligence and solicitation procedures (.4). Review and organize all due diligence documents received from Hines and client (1.4). Working meeting with A. Perez to review due diligence documents received from Hines and client and to determine whether we have all documents satisfying Schedule 3.1 of the PSAs (1.1).	2.90	623.50
04/09/25	ARP	Phone conference with L. Holl Chang regarding leasing issues at Windward Oaks (.1); phone conference with D. Meline and Cushman & Wakefield team and L. Holl Chang and BANA representative regarding Windward Oaks sales process (.4); correspond with M. Millard regarding documents related to sales process (.2); conduct preliminary review of promotional teaser and offering memorandum for Windward Oaks property (1.0); and correspond with C. Haddad regarding promotional teaser (.1).	1.80	900.00
04/09/25	JDC	Conference with A. Perez regarding Cushman disclosure relating to CHEP and communication of same to BANA (.3). Update conference with A. Perez following group meeting with Cushman (.1).	0.40	276.00
04/09/25	HJV	Emails to Cushman & Wakefield and Eastdil with links to additional documents responsive to the items listed in Schedule 3.1 of the PSA (.5). Emails to L. Channel and Amanda Jimenez regarding PSA list of items and documents lacking and still needed (.8).	1.40	301.00
04/10/25	ARP	Phone conference with B. Allen and Eastdil team and T. Kiriakos BANA, and Mayer Brown team regarding status of sales processes for Mark Center and Bowie (.2); phone conference with L. Holl Chang regarding Windward Oaks lease issue (.2); and draft correspondence to M. Millard and B. Allen providing title commitments (.3).	0.70	350.00
04/11/25	ARP	Conduct final review of Windward Oaks teaser (.4); draft correspondence to M. Millard providing final comments on same (.2); correspond with A. Jimenez regarding broker inquiries and contact information (.2); and conduct review of offering memorandums for Bowie and Mark Center (1.2).	2.00	1,000.00
04/11/25	JDC	Conference with A. Perez regarding various marketing and related updates from recent broker calls, including revisions to Windward Oaks marketing teaser.	0.30	207.00
04/14/25	JDC	Various email communications regarding Mark Center and Bowie offering memorandum and review of drafts of same (.3). Analysis of revised Windward Oaks investment summary from Molly Millard (.2).	0.50	345.00

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04/14/25	ARP	Review Windward Oaks offering memorandum (2.4); multiple correspondences with A. Jimenez, C. Shah, and L. Holl Chang regarding offering memorandums for Bowie and Mark Center (.9); review comments from L. Holl Chang to Bowie and Mark Center offering memoranda (.4); and correspond with A. Jimenez and L. Channell regarding review of Windward Oaks offering memorandum (.2).	3.90	1,950.00
04/15/25	JDC	Analysis of emails from Lisa Holl Chang to Cushman and Eastdil regarding property descriptions (.2). Coordination with A. Perez regarding same (.2).	0.40	276.00
04/15/25	ARP	Correspond with M. Millard regarding Windward Oaks sales process (.1); correspond with A. Jimenez and L. Channell regarding comments to Windward Oaks offering memorandum (.1); review correspondence from A. Jimenez providing commentary on the Bowie offering memorandum (.1); draft correspondence to J. Bakshi providing comment on Bowie offering memorandum (.2); and conduct final review of Windward Oaks offering memorandum (1.5).	2.00	1,000.00
04/16/25	ZAS	Reviewed correspondence and utility invoices regarding past due amounts paid by the 5775 DTC purchaser that may be for pre-closing periods and the PSA provisions regarding the same; (.3) and prepared comments for A. Perez regarding how the contract applies to the same (.3).	0.60	330.00
04/16/25	JDC	Analysis of revised draft offering memoranda and financial schedules for Mark Center and Bowie.	0.30	207.00
04/16/25	ARP	Phone conference with M. Millard regarding sales process and inquiries regarding Windward Oaks property (.2); multiple correspondences with J. Bakshi, A. Jimenez, and J. Baumgartner regarding review of financial information related to Bowie and Mark Center (.4); correspond with M. Millard and L. Holl Chang regarding Windward Oaks offering memorandum (.1); and correspond with C. Silva regarding Bureau Veritas' access to diligence documents (.2).	0.90	450.00
04/17/25	JDC	Analysis of marketing update report from Eastdil (.1). Attendance of meeting with Eastdil and BANA (partial) (.1). Related coordination with A. Perez (.1). Various email communications with Eastdil and BANA (.1).	0.40	276.00
04/17/25	ARP	Multiple correspondences with J. Baumgartner and C. Shah regarding Bowie and Mark Center pro forma (.5); review Bowie and Mark Center sale update (.1); participate in weekly phone conference with D. Dorros and Eastdil team, T. Kiriakos and Mayer Brown team, and G. Katunas and BANA team regarding Bowie and Mark Center sales status (.3); review financial pro forma for Bowie and Mark Center (1.1); and correspond with J. Bakshi regarding the Bowie and Mark Center pro forma (.1).	2.10	1,050.00
04/18/25	ARP	Attention to correspondence with B. Allen and M. Millard regarding offering memoranda and data rooms.	0.30	150.00

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04/18/25	JDC	Email communications with Eastdil and BANA regarding finalizing and posting financial schedules for Mark Center and Bowie.	0.10	69.00
04/21/25	ARP	Attention to correspondence with A. Simon, A. Jimenez, C. Shah, and B. Allen and Eastdil team regarding data room issues.	0.50	250.00
04/22/25	ARP	Correspond with A. Simon and M. Millard regarding access and review of data room for Windward Oaks (.2); review data room for Windward Oaks property and related documents (1.5); multiple correspondences with M. Millard regarding contents of data room for Windward Oaks (.8); review Innovalon lease in relation to questions related to Bowie offering memorandum (.5); and correspond with B. Allen and Eastdil team and C. Shah providing recommendation regarding final issues related to Bowie offering memorandum (.4).	3.40	1,700.00
04/23/25	JDC	Attendance of broker meeting regarding Windward Oaks marketing update (.3). Analysis of Windward Oaks marketing report (.2).	0.50	345.00
04/23/25	ARP	Review marketing update for Windward Oaks (.1); phone conference with J. Cornwell, M. Millard and Cushman & Wakefield team, G. Katunas and BANA team, and T. Kiriakos and Mayer Brown team regarding sales process updates for Windward Oaks and related issues (.7); multiple correspondences with M. Millard, A. Jimenez, and J. Baumgartner regarding items needed for Windward Oaks data room (.9); multiple correspondences with A. Jimenez and L. Channell regarding follow up on Windward Oaks sales process (.8); and review correspondence from C. Shah regarding Bowie offering memorandum (.1).	2.60	1,300.00
04/24/25	ARP	Review marketing update for Bowie and Mark Center (.2); phone conference with J. Cornwell, B. Allen and Eastdil team, G. Katunas and BANA team, and T. Kiriakos and Mayer Brown team regarding marketing updates for Bowie and Mark Center and related issues (.3); and multiple correspondences with L. Channell, S. Martin, D. Meline, and M. Millard regarding coordination on Windward Oaks sales process (.5).	1.00	500.00
04/24/25	JDC	Analysis of marketing update from Eastdil (.2). Conference with BANA and Eastdil teams regarding status (.3).	0.50	345.00
04/25/25	ARP	Correspond with J. Bakshi regarding data room for DC properties (.1); and multiple correspondences with L. Channell, S. Martin, A. Jimenez, and M. Millard and Cushman team regarding Windward Oaks sales process (.5).	0.60	300.00
04/25/25	JDC	Receipt of data room links from Eastdil, and coordination with team regarding same.	0.10	69.00
04/28/25	JDC	Communication with John Baumgartner regarding noticing procedures for Westway interests.	0.10	69.00

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04/28/25	ARP	Phone conference with M. Millard, B. Mixon, A. Jimenez, S. Martin, and L. Channell regarding tour and leasing issues for Windward Oaks (.4); review Bowie and Mark Center data rooms (.8); correspond with J. Bakshi providing comments on data room contents (.6); correspond with B. Mixon regarding Windward Oaks contract issues (.5); and correspond with A. Jimenez regarding Westway auction (.3).	2.60	1,300.00
04/29/25	HJV	Discuss with A. Perez logistics of setting up data room to comply with court's order.	0.20	43.00
04/29/25	JDC	Coordination with A. Perez regarding Westway marketing and populating data room through Getzler assistance (.1). Related email communications with John Baumgartner and A. Perez (.1).	0.20	138.00
04/29/25	ARP	Work session with H. Valentine regarding Westway data room logistics (.2); strategy work session regarding Westway data room contents (.4); correspond with J. Baumgartner regarding Westway data room (.1); phone conference with J. Baumgartner regarding Westway equity sales process and data room contents (.7); phone conference with C. Haddad regarding Westway stalking horse bid and office building sale updates (.5); review documents circulated by A. Jimenez for Westway data room (.4); and draft correspondence to B. Mixon providing analysis of lease issues in bankruptcy in connection with Windward Oaks sale (.5).	2.70	1,350.00
04/30/25	HJV	Extended call with A. Perez regarding information needed regarding Westway for the data room.	0.40	86.00
04/30/25	ARP	Work session with H. Valentine regarding Westway data room contents (.4); revise contents of Westway data room (.5); review environmental and property condition reports for Windward Oaks (2.0); phone conference with S. Martin regarding Windward Oaks leasing issues relevant to sales process (.3); and review marketing report for Windward Oaks (.1).	3.20	1,600.00
04/30/25	JDC	Review marketing report from Cushman team.	0.10	69.00
Total for 08			56.20	27,817.50

Task Code: 09 Leases and Contracts

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/07/25	ARP	Correspond with A. Jimenez regarding lease communications and issues.	0.30	150.00
Total for 09			0.30	150.00

Task Code: 10 Bar Date and Claims Administration

Munsch Hardt Kopf & Harr, P.C.
 Matter Number: 021990.00002
 Invoice Number: 10556738
 Client: The Aztec Fund Holding, Inc.
 Matter Description: Chapter 11 Bankruptcy Cases

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 May 7, 2025

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/04/25	ARP	Correspond with S. McGuire and C. Cu regarding provision of proofs of claim.	0.30	150.00
Total for 10			0.30	150.00

Task Code: 11 Plan and Disclosure Statement

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/22/25	HJV	Prepare agenda for 4/23 hearing.	0.50	107.50
04/22/25	ARP	Work session with B. Funk regarding disclosure statement hearing (.1); and review agenda for disclosure statement hearing (.1).	0.20	100.00
04/23/25	JDC	Preparation for disclosure statement hearing, including consultation of notes and prior exhibit list to provide evidentiary support for disclosure statement approval in the event necessary (.5). Attendance of disclosure statement hearing (.5).	1.00	690.00
04/23/25	ARP	Attend hearing on motion for conditional approval of disclosure statement and other related relief (.5); and review order granting same (.1).	0.70	350.00
04/23/25	BLF	Correspondence with H. Valentine regarding calendar (.1); Prepare for and attend disclosure statement hearing (.5).	0.60	360.00
04/23/25	HJV	Prepare binder for DS hearing (.8). Attention to entering electronic appearances for J. Cornwell, B. Funk and A. Perez (.2).	1.00	215.00
04/24/25	ARP	Phone conference with C. Cu regarding solicitation documents and process (.1); and prepare revisions to solicitation materials (1.2).	1.30	650.00
04/24/25	HJV	Revisions to plan solicitation and related notices (1.3). Confer with A. Perez regarding same (.2).	1.30	279.50
04/25/25	ARP	Attention to correspondence with B. Funk, H. Valentine, and C. Cu regarding revisions to solicitation materials and solicitation process.	0.60	300.00
04/25/25	BLF	Conferences with Stretto and MHKH team regarding solicitation (.3); review final solicitation materials for filing (.3).	0.60	360.00
04/25/25	HJV	Revisions to the solicitation version of the Disclosure Statement and Plan and related notices (2.0). Multiple emails with B. Funk regarding same (.2). Finalize and file same (.2). Email to Stretto regarding solicitation materials (.2).	2.60	559.00
Total for 11			10.40	3,971.00

Task Code: 12 Tax Matters/Taxing Authorities

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10556738
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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May 7, 2025

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/17/25	ARP	Phone conference with P. Hodson regarding IRS audit and other tax issues.	0.20	100.00
Total for 12			0.20	100.00

Task Code: 13 Business Operations

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/09/25	ARP	Correspond with A. Jimenez regarding Mark Center project issue.	0.20	100.00
04/10/25	ARP	Correspond with A. Jimenez and C. Shah regarding property management and capital expense related issues for Bowie and Mark Center.	0.40	200.00
Total for 13			0.60	300.00

Task Code: 14 Reporting/MORs

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/01/25	ARP	Correspond with J. Baumgartner regarding February MORs.	0.10	50.00
04/03/25	ARP	Correspond with G. Otto and J. Baumgartner regarding February MORs.	0.20	100.00
04/07/25	ARP	Correspond with J. Baumgartner following up on status of MORs.	0.20	100.00
04/07/25	JDC	Coordination with A. Perez regarding MOR finalization and filing; related email communication with John Baumgartner.	0.10	69.00
04/10/25	ARP	Review MORs for February 2025 (.7); and multiple correspondences with J. Baumgartner, B. Kim, and H. Valentine regarding finalization and filing of same (.2).	0.90	450.00
04/10/25	HJV	Finalize for filing monthly operating reports for all 12 Aztec entities.	1.00	215.00
Total for 14			2.50	984.00
Total			87.00	\$40,810.50

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10556738
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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May 7, 2025

Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	John D. Cornwell	JDC	690.00	6.70	4,623.00
Shareholder	Alexander R. Perez	ARP	500.00	63.80	31,900.00
Shareholder	Brenda L. Funk	BLF	600.00	1.40	840.00
Shareholder	Zachary (Zack) A. Schneider	ZAS	550.00	0.60	330.00
Paralegal	Heather J. Valentine	HJV	215.00	14.50	3,117.50
Total				87.00	\$40,810.50

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/07/25	U.S. Courts: PACER - Pacer Research – Charges incurred during the period 01/01/25 - 03/31/25	0.00
04/01/25	1.95 GB Active for April- Data Hosting Service (CS Disco)	39.04
Total		\$39.04

Cost Summary

<u>Description</u>	<u>Amount</u>
Data Hosting Service	39.04
Pacer Research	0.00
Total	\$39.04

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	Case Administration/Noticing	0.60	129.00
02	General Bankruptcy Advice/Opinions	12.40	6,029.00
07	Employment and Fee Applications	3.50	1,180.00
08	Asset Disposition	56.20	27,817.50
09	Leases and Contracts	0.30	150.00
10	Bar Date and Claims Administration	0.30	150.00
11	Plan and Disclosure Statement	10.40	3,971.00
12	Tax Matters/Taxing Authorities	0.20	100.00
13	Business Operations	0.60	300.00

Munsch Hardt Kopf & Harr, P.C.
 Matter Number: 021990.00002
 Invoice Number: 10556738
 Client: The Aztec Fund Holding, Inc.
 Matter Description: Chapter 11 Bankruptcy Cases

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 May 7, 2025

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
14	Reporting/MORs	2.50	984.00
Total		87.00	\$40,810.50

Outstanding Invoices

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Total Balance</u>
03/12/25	10552192	83,139.90	66,675.80	16,464.10
04/07/25	10554037	45,145.08	36,131.68	9,013.40
Total				\$25,477.50



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
Fax 214.855.7584
munsch.com

The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: May 7, 2025
Invoice Number: 10556738
Matter Number: 021990.00002

For Professional Services through April 30, 2025

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	40,810.50
Total Costs	\$	39.04
TOTAL THIS INVOICE	\$	40,849.54
Previous Balance	\$	25,477.50
Total Balance Due	\$	66,327.04

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.



Ross Tower
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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: June 19, 2025
Invoice Number: 10560466
Matter Number: 021990.00002

*For Professional Services through **May 31, 2025***

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	43,667.00
Total Costs	\$	<u>39.04</u>
TOTAL THIS INVOICE	\$	43,706.04
Previous Balance	\$	<u>33,639.60</u>
Total Balance Due	\$	77,345.64

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10560466
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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June 19, 2025

Fee Detail

Task Code: 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/15/25	ARP	Provide instruction to H. Valentine regarding service of 9019 insurance settlement motion.	0.10	50.00
05/23/25	ARP	Correspond with C. Cu regarding service of the cure notice.	0.10	50.00
05/27/25	HJV	Update internal docket with recent filings.	0.10	No Charge
Total for 01			0.30	100.00

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/02/25	HJV	Revise order regarding 9019 motion approving settlement with Endurance.	0.30	64.50
05/02/25	ARP	Review redlines to 9019 insurance settlement motion (.5); correspond with D. Sigal regarding same (.1); and prepare revised proposed order for 9019 insurance settlement motion (.3).	0.90	450.00
05/05/25	ARP	Prepare final revisions to 9019 motion for insurance settlement, settlement agreement, and proposed order (.8); correspond with C. Haddad regarding approval of same (.4); correspond with D. Sigal and BANA team regarding final revisions to settlement documents and providing draft proposed order on 9019 motion (.2); and draft correspondence to J. Gibbs providing final markup of settlement motion and documents for insurance carrier's consideration (.4).	1.80	900.00
05/06/25	ARP	Revise proposed order on 9019 motion per comment from BANA (.1); and correspond with D. Sigal regarding same (.1).	0.20	100.00
05/08/25	HJV	Confer with A. Perez regarding filing of notice of rescheduled hearing and MORs.	0.20	43.00
05/09/25	ARP	Draft correspondence to J. Gibbs regarding insurance settlement and 9019 motion.	0.10	50.00
05/14/25	ARP	Follow up phone call and correspondence with J. Gibbs regarding 9019 insurance settlement motion and confirming filing (.2); correspond with D. Sigal regarding forthcoming 9019 insurance settlement motion filing (.1); prepare final revisions to 9019 insurance settlement motion (.9); and correspond with A. Jimenez and J. Breen regarding follow up on DTC sale (.5).	1.70	850.00
05/22/25	ARP	Draft correspondence to J. Gibbs regarding filed 9019 settlement motion.	0.10	50.00

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10560466
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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05/28/25	ARP	Case strategy conference with J. Cornwell and B. Funk regarding outstanding issues and tasks for upcoming case milestone events.	0.60	300.00
Total for 02			5.90	2,807.50

Task Code: 07 Employment and Fee Applications

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/25	HJV	Prepare third interim fee application.	0.70	150.50
05/05/25	HJV	Begin review of invoice in preparation of the ninth monthly fee statement.	0.20	43.00
05/06/25	ARP	Multiple correspondences with J. Baumgartner regarding Getzler Henrich fee application order and plans for third interim fee applications (.2); and prepare revisions to Munsch Hardt's April 2025 invoice (.8).	1.00	500.00
05/06/25	HJV	Continue review of April invoice in preparation of the ninth monthly fee statement for Munsch Hardt (.4). Prepare ninth monthly fee statement (.2).	0.60	129.00
05/07/25	ARP	Revise Munsch Hardt's ninth monthly fee statement (.5); draft correspondence to J. Whitworth, T. Kiriakos and other notice parties providing Munsch Hardt's ninth monthly fee statement (.1); and draft correspondence to C. Haddad and A. Jimenez providing Munsch Hardt's ninth monthly fee statement and April 2025 invoice (.1).	0.70	350.00
05/07/25	HJV	Call with A. Perez regarding revisions to April invoice (.1). Emails with E. Pinales regarding revisions to April invoice (.1). Revise ninth monthly fee statement (.3).	0.50	107.50
05/08/25	HJV	Continue working on Munsch Hardt's third interim fee application.	0.80	172.00
05/14/25	HJV	Continue working on third interim fee application.	2.80	602.00
05/16/25	HJV	Continue working on Munsch Hardt's third interim fee application.	0.50	107.50
05/19/25	ARP	Revise Munsch Hardt's third interim fee application.	3.40	1,700.00
05/22/25	ARP	Correspond with A. Jimenez regarding Munsch Hardt's ninth monthly fee statement.	0.10	50.00
05/27/25	ARP	Revise Munsch Hardt's third interim fee application.	2.00	1,000.00
05/28/25	ARP	Prepare revisions to Munsch Hardt's third interim fee application (.8); draft correspondence to J. Cornwell regarding draft third interim fee application and related budgeting issues (.3); and multiple correspondences with J. Baumgartner regarding review of Getzler's third interim fee application (.1).	1.20	600.00
05/29/25	JDC	Analysis of Third Interim Fee Application and supporting exhibits, and preparation of revisions and additions to same (.4); related communication with A. Perez (.1).	0.50	345.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

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Client: The Aztec Fund Holding, Inc.

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05/29/25	ARP	Prepare redlined comments to Getzler's third interim fee application (.4); multiple correspondences with J. Baumgartner regarding redlined comments to Getzler's third interim fee application (.2); correspond with H. Valentine regarding issue related to exhibits for Munsch Hardt's third interim fee application (.1); and prepare final revisions to Munsch Hardt's third interim fee application (.2).	0.90	450.00
05/30/25	HJV	Review and revise third interim fee application (.6). Redact and prepare exhibits for filing (.7). Calls and emails with A. Perez regarding same (.2). Finalize for filing of same (.1). Attention to calendaring objection deadlines regarding same (.1). Review and revise Getzler Henrich's third interim fee application (.3). Prepare order regarding Getzler Henrich's third interim fee application (.2). Redact and finalize exhibits to Getzler Henrich's third interim fee application (.5). Email to E. Pinales requesting LEDES data (.1). Finalize for filing of same (.2).	3.00	645.00
05/30/25	ARP	Correspond with J. Baumgartner coordinating filing of Getzler's third interim fee application (.1); review proposed order for Getzler's third interim fee application (.1); multiple correspondences with H. Valentine regarding final approval and coordination of Munsch Hardt's and Getzler's third interim fee applications (.5); and correspond with J. Baumgartner regarding Getzler's filed third interim fee application (.1).	0.80	400.00
Total for 07			19.70	7,351.50

Task Code: 08 Asset Disposition

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/25	ARP	Review Bowie and Mark Center marketing update (.2); phone conference with J. Cornwell; B. Allen and Eastdil team; T. Kiriakos and Mayer Brown Team; and G. Katunas and BANA team regarding Bowie and Mark Center marketing updates (.3); phone conference with D. Meline and M. Millard regarding reports for Windward Oaks (.1); and correspond with D. Meline and M. Millard regarding same (.3).	0.90	450.00
05/01/25	HJV	Review documents provided by Hines regarding due diligence requests and organize same (.3). Email with A. Perez regarding status of same (.1). Email to Amanda Jimenez requesting due diligence documents responsive to the PSA (.1). Organize and set up data room for Westway property and email to B. Funk and A. Perez regarding same (.3).	0.80	172.00
05/01/25	JDC	Conference with Eastdil and BANA representatives to discuss status of Mark Center and Bowie sale processes (.3). Analysis of marketing update from Eastdil (.1).	0.40	276.00
05/02/25	HJV	Emails with Amanda Jimenez regarding additional documents responsive to the PSA (.2). Email to Cushman Wakefield with additional documents (.1).	0.30	64.50

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

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Client: The Aztec Fund Holding, Inc.

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05/02/25	ARP	Attention to correspondence with A. Jimenez, H. Valentine, and M. Millard and Cushman & Wakefield team regarding additional documents for Windward Oaks data room.	0.20	100.00
05/06/25	ARP	Case strategy work session with B. Funk regarding issues related to TAF equity stalking horse bid and timing of combined hearing (.3); case strategy work session with J. Cornwell and B. Funk regarding TAF equity stalking horse bid and timing of combined hearing (.3); and correspond with C. Haddad providing recommendations relating to TAF equity stalking horse bid and other issues (.6).	1.20	600.00
05/07/25	ARP	Review Windward Oaks marketing report (.1); phone conference with M. Millard and Cushman team, L. Holl Chang, and G. Katunas regarding Windward Oaks marketing updates and auction procedures (.6); and correspondences with D. Sigal and R. Saldana regarding rescheduling of confirmation and sales hearing (.4).	1.10	550.00
05/07/25	HJV	Update calendar with deadlines from solicitation order.	0.20	43.00
05/07/25	JDC	Analysis of Windward Oaks marketing report from Cushman & Wakefield.	0.10	69.00
05/08/25	ARP	Review marketing report for Bowie and Mark Center (.1); phone conference with J. Cornwell; B. Allen and Eastdil team; T. Kiriakos and Mayer Brown team; and G. Katunas regarding market updates for Bowie and Mark Center (.5).	0.60	300.00
05/08/25	JDC	Conference with Eastdil and BANA teams to discuss sale status and strategy.	0.50	345.00
05/12/25	JDC	Analysis of communication with BANA team to confer regarding receipt of stalking horse bid amount for Westway.	0.10	69.00
05/12/25	ARP	Review and consider bidding procedures regarding auction logistics (.5); review and consider TAF Westway Equity Auction procedures (.3); and draft correspondence to T. Kiriakos coordinating logistics of receipt of Stalking Horse Bid funds for TAF Westway equity Auction (.6).	1.40	700.00
05/13/25	HJV	Confer with A. Perez regarding logistics of upcoming auctions.	0.20	43.00
05/13/25	ARP	Work session with H. Valentine regarding upcoming property auction logistics.	0.20	100.00
05/14/25	HJV	Review motion, order, and exhibits and finalize for filing.	0.60	129.00
05/14/25	JDC	Coordinating communications with BANA team regarding Westway auction (.1). Analysis of Windward Oaks marketing report (.1).	0.20	138.00
05/14/25	ARP	Correspond with M. Millard regarding calendaring of marketing update calls (.1); and review weekly marketing report for Windward Oaks (.1).	0.20	100.00
05/15/25	HJV	Attention to calendaring objection deadline regarding motion for approval of settlement with Endurance (.1). Email with Stretto regarding the service of the 9019 motion (.1).	0.20	43.00
05/15/25	JDC	Conference with Eastdil and BANA teams regarding marketing updates for Mark Center and Bowie (.3). Follow-up conference with A. Perez regarding review of leases for	1.10	759.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10560466

Client: The Aztec Fund Holding, Inc.

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		estoppel provisions in response to Eastdil request (.1). Review SPA and Inovalon leases relating to tenant estoppel certificate process and requirements (.3). Email communications with BANA team and telephone conference with Lisa Holl Chang regarding strategic process for securing estoppel certificates (.3). Related coordination with A. Perez (.1).		
05/15/25	ARP	Review updated marketing report for Bowie and Mark Center (.1); phone conference with J. Cornwell; B. Allen and Eastdil team; T. Kiriakos and Mayer Brown team; and G. Katunas (.3); review SPA and Inovalon leases (.5); work sessions with J. Cornwell regarding estoppel provisions of SPA and Inovalon leases (.2).	1.10	550.00
05/16/25	ARP	Multiple correspondences with J. Cornwell, C. Shah, and B. Allen regarding estoppel certificates for SPA and Inovalon.	0.60	300.00
05/16/25	JDC	Email communications with A. Perez and Chirag Shah regarding process for requesting estoppel certificates.	0.10	69.00
05/20/25	JDC	Preliminary review of draft bid forms from Eastdil (.1). Coordination with A. Perez regarding same (.1). Review of revisions to estoppel certificates from Chirag Shah (.2). Related coordination with A. Perez (.1). Communications with Charles Haddad and A. Perez regarding Westway equity interests updates (.1). Conference with A. Perez regarding various sale-related updates and issues (.2). Analysis of email update from A. Perez to Eastdil and BANA teams (.1).	0.90	621.00
05/20/25	ARP	Correspond with J. Bakshi regarding bid forms (.1); preliminary review of bid forms (.2); correspond with C. Shah regarding draft estoppel certificates for SPA and Inovalon (.1); revise draft estoppel certificates for SPA and Inovalon (1.5); correspond with B. Allen and Eastdil team, and T. Kiriakos and Mayer Brown team regarding draft estoppel certificates for SPA and Inovalon (.4); correspond with Z. Schneider regarding draft estoppel certificates for SPA and Inovalon (.2); correspond with C. Haddad regarding remittance of stalking horse bid funds for Westway equity auction (.2); and case strategy work session with B. Funk regarding sales processes and related tasks (.7).	3.40	1,700.00
05/20/25	ZAS	Correspond with Alex Perez regarding the draft estoppel certificates.	0.20	110.00
05/21/25	HJV	Confer with A. Perez regarding the SPA and Inovalon leases and amendments (.1). Email to Z. Schneider regarding same (.1).	0.20	43.00
05/21/25	JDC	Communication with Charles Haddad regarding Westway stalking horse bid deposit (.1). Various communications with Eastdil team, Chirag Shah, and MHKH team regarding Mark Center estoppel certificate (.2). Communications with A. Perez following Windward Oaks update conference with broker and BANA teams (.1). Analysis of BANA revisions to estoppel certificate (.1). Analysis of Cushman marketing report (.1).	0.60	414.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 021990.00002

Invoice Number: 10560466

Client: The Aztec Fund Holding, Inc.

Matter Description: Chapter 11 Bankruptcy Cases

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05/21/25	ARP	Review Windward Oaks marketing update (.1); correspond with B. Funk and J. Baumgartner regarding Windward Oaks marketing report (.1); correspond with C. Haddad regarding transfer of funds for stalking horse bid for Westway equity auction (.1); phone conference with L. Holl Chang regarding estoppel certificates and sales issues (.1); phone conference regarding Windward Oaks marketing updates with M. Millard and Cushman & Wakefield team, T. Kiriakos and Mayer Brown team, and G. Katunas (.6); multiple work sessions with Z. Schneider regarding estoppel certificates for SPA and Inovalon (.3); multiple correspondences with Z. Schneider regarding estoppel certificates for SPA and Inovalon (.6); review revised estoppel certificates (1.0); review proposed revisions to bid form (.6); multiple correspondences with A. Jimenez and M. Millard regarding insurance loss runs report (.4); and correspond with M. Millard and Cushman team regarding request for expedited survey (.2).	4.10	2,050.00
05/21/25	ZAS	Confer with Alex Perez regarding the estoppel certificates (0.2). Review the SPA estoppel and the existing lease and prepared comments to the same (0.5). Review the Inovalon estoppel and existing lease and prepared comments to the same (0.6). Prepare updated clean and redline drafts of the estoppel certificates (0.3). Correspond with Alex Perez regarding the lease documents listed in the estoppel certificates (0.1).	1.70	935.00
05/22/25	JDC	Analysis of bid form and estoppel certificate revisions from A. Perez and BANA team (.3). Analysis of Eastdil update memo (.1). Conference with Eastdil, BANA, and MHKH teams regarding marketing update and strategy (.4). Update email from Cushman team regarding survey (.1). Analysis of forward-facing marketing circulars for Mark Center and Bowie (.1).	1.00	690.00
05/22/25	ARP	Review updated marketing report of Bowie and Mark Center (.2); review revisions to estoppel certificates for SPA and Inovalon (1.2); multiple correspondences with C. Shah and A. Jimenez regarding issues related to sublease and letter agreement for Inovalon (.4); phone conference regarding marketing updates for Bowie and Mark Center with J. Cornwell, B. Allen and Eastdil team, L. Holl Chang, and G. Katunas (.4); correspond with B. Funk and J. Baumgartner regarding Bowie and Mark Center marketing report (.1); multiple correspondences with C. Haddad and L. Holl Chang regarding receipt and earmarking of the stalking horse bid funds for the equity auction (.5); prepare cure notice for sales of Mark Center, Bowie, and Windward Oaks (1.8); review revised bid forms for Mark Center and Bowie (.4); draft correspondence to J. Bakshi and Eastdil team regarding revised bid forms (.2); prepare further revisions to estoppel certificate for Inovalon (.2); correspond with J. Bakshi regarding letter agreement for Inovalon lease (.2); correspond with A. Jimenez, C. Shah, L. Channell, and J. Baumgartner regarding cure notice schedules (.2); correspond with J.	6.20	3,100.00

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 Matter Number: 021990.00002
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 Client: The Aztec Fund Holding, Inc.
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		Bakshi regarding sale hearing time (.2); and correspond with H. Valentine regarding draft cure notice (.2).		
05/22/25	ZAS	Correspond with Alex Perez regarding the estoppel certificates.	0.20	110.00
05/23/25	JDC	Preparation of draft answers to various questions from Cushman from potential bidders (.2); conference with A. Perez regarding finalizing answers (.1). Analysis of response to Cushman (.1). Follow-up email communication with BANA team regarding same (.1).	0.50	345.00
05/23/25	ARP	Correspond with S. Idris providing detailed responses to questions from potential bidders (.6); multiple work sessions with H. Valentine regarding cure schedules and amounts (1.6); multiple correspondences with A. Jimenez, L. Cooper, and C. Shah regarding cure schedules and amounts (1.8); review draft cure schedule amounts and information (1.8); multiple correspondences with L. Holl Chang regarding draft cure notice (.3); prepare final revisions to cure notice (.3); review revised bid form for Windward Oaks (.2); correspond with L. Holl Chang regarding revised bid form for Windward Oaks (.1); draft correspondence to J. Bakshi and Eastdil team regarding cure notice and schedules (.2); and draft correspondence to M. Millard and Cushman team regarding cure notice and schedules and draft bid form (.2).	7.10	3,550.00
05/23/25	HJV	Prepare cure schedules for Bowie, Mark Center and Windward Oaks (5.6). Multiple calls and work sessions with A. Perez regarding same (1.6). Emails and calls with Stretto regarding same (.2). Call with B. Funk regarding same (.1). Call with Amanda Jimenez and A. Perez regarding additional notice parties and cure amounts (.2). Compare revisions to the schedules received from Amanda Jimenez and Linda Cooper with Hines (.8). Revise cure schedules (.8). Finalize same for filing (.1).	8.40	1,806.00
05/27/25	JDC	Conference with B. Funk and A. Perez each regarding upcoming deadlines and final preparation for auctions.	0.20	138.00
05/27/25	HJV	Confer with A. Perez regarding upcoming auctions and deadlines.	0.10	21.50
05/27/25	ARP	Review equity auction procedures and notice (.2); and draft notice related to cancellation of equity auction for TAF Westway (2.0).	2.20	1,100.00
05/28/25	HJV	Email to Veritext providing auction details and requesting court reporters for upcoming auctions.	0.20	43.00
05/28/25	ARP	Review marketing update for Windward Oaks (.1); phone conference with J. Cornwell, D. Meline and Cushman & Wakefield team, L. Holl Chang, and G. Katunas regarding Windward Oaks marketing updates (.6); correspond with J. Baumgartner and B. Funk regarding Windward Oaks marketing update (.1); phone conference with L. Holl Chang and J. Cornwell regarding bidding procedures and related issues (.3); multiple correspondences with S. Idris relating to cure schedule (.4); work session with J. Cornwell regarding	3.10	1,550.00

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		bidding procedure mechanics and issues (.2); correspond with L. Holl Chang regarding bidding procedure issues (.7); and review documents and related correspondence related to bid (.7).		
05/28/25	JDC	Preparation for meeting with Cushman and BANA teams (.1). Conference with Cushman and BANA teams regarding marketing updates and auction preparation (.6). Follow-up strategy conference with A. Perez, including review of sale motion and order for qualifying bidder flexibility (.3). Preliminary review of Bowie bid and proof of funds (.2).	1.20	828.00
05/29/25	ARP	Phone conference with J. Cornwell; D. Dorros and Eastdil team; L. Holl Chang and Mayer Brown team; and G. Katunas regarding marketing updates for Bowie and Mark Center (.4); call with L. Holl Chang and J. Cornwell regarding auction procedures and related issues (.3); phone conference with D. Meline regarding cure amounts and auction process (.5); correspond with J. Baumgartner and B. Funk providing updated marketing report for Bowie and Mark Center (.1); multiple correspondences with B. Allen and L. Holl Chang regarding bid issue (.2); and correspond with D. Meline and A. Jimenez regarding request for updated insurance loss report for Windward Oaks (.2).	1.70	850.00
05/29/25	JDC	Analysis of marketing update from Eastdil (.1). Conference with BANA and Eastdil teams regarding marketing status and auction preparations (.4). Follow-up conference with Lisa Holl Chang and A. Perez regarding auction procedures (.3).	0.80	552.00
05/30/25	JDC	Analysis of various email communications between Eastdil and bidders.	0.20	138.00
05/30/25	ARP	Review revised ALTA survey for Windward Oaks (.1); correspond with S. Idris regarding responses to questions from bidders (.4); multiple correspondences with A. Jimenez, L. Channell, and L. Cooper regarding Windward Oaks association (.4); draft correspondence to B. Allen and Eastdil providing status update on discussions on bidding mechanics (.3); review limited objection to cure notice and sale filed by SPA and related exhibits (.6); review submitted bid forms and related documentation and correspondence (.8); revise notice related to cancellation of equity auction designation of stalking horse bidder as winning bidder (1.0); and correspond with B. Funk regarding same (.1).	3.70	1,850.00
05/31/25	ARP	Correspond with L. Channell and D. Meline and Cushman team regarding association agreements and documents for Windward Oaks.	0.30	150.00
Total for 08			60.50	28,664.00

Task Code: 11

Plan and Disclosure Statement

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/05/25	JDC	Analysis of email from Lisa Holl Chang regarding balloting coordination (.1). Related communication with team (.1).	0.20	138.00
05/06/25	JDC	Coordination with B. Funk and A. Perez regarding balloting and other plan confirmation logistics, including coordination with BANA (.2). Coordination with A. Perez regarding formulating response to Charles Haddad regarding various confirmation updates and funding of stalking horse bid (.2). Analysis of email from A. Perez to Charles Haddad regarding same (.1).	0.50	345.00
05/07/25	ARP	Phone conference with B. Funk, L. Holl Chang, and D. Sigal regarding ballot-related issues.	0.30	150.00
05/07/25	JDC	Communication with A. Perez regarding hearing change and coordination regarding related communication with court (.1). Analysis of email with case manager regarding same (.1).	0.20	138.00
05/08/25	ARP	Multiple correspondences with C. Haddad, R. Saldana, and D. Sigal regarding rescheduling of combined June 12 hearing.	0.40	200.00
05/09/25	ARP	Work sessions with H. Valentine regarding notice of rescheduled hearing (.2); revise notice of rescheduled hearing (.5); correspond with R. Saldana regarding filed notice of rescheduled hearing (.1); and correspond with A. Blanadet regarding service of the notice of rescheduled hearing (.1).	0.90	450.00
05/09/25	HJV	Confer with A. Perez regarding filing notice of rescheduled hearing (.2). Prepare notice (.8). Finalize same for filing (.2).	1.20	258.00
05/09/25	JDC	Communications with case manager and review of notice of rescheduled hearing.	0.10	69.00
05/20/25	ARP	Correspond with L. Holl Chang regarding ballot preparation issue.	0.10	50.00
05/27/25	ARP	Correspond with B. Funk regarding data for ballots.	0.20	100.00
05/27/25	BLF	Collect information and prepare revised ballot details for BANA (1.2); transmit same to BANA for review (.1).	1.30	780.00
05/28/25	BLF	Prepare list of action items required for confirmation (.5); conference with J. Cornwell and A. Perez regarding same (.5); correspondence regarding ballots for BANA (.2).	1.20	720.00
05/28/25	JDC	Conference with B. Funk and A. Perez to coordinate regarding plan confirmation, balloting, and auction processes.	0.40	276.00
Total for 11			7.00	3,674.00

Task Code: 14 Reporting/MORs

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/05/25	ARP	Correspond with J. Baumgartner regarding status of MORs.	0.10	50.00
05/05/25	JDC	Communication with John Baumgartner and A. Perez regarding status of MORs.	0.10	69.00
05/08/25	ARP	Correspond with B. Kim regarding monthly operating reports for March 2025.	0.20	100.00

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05/10/25	ARP	Correspond with H. Valentine regarding March 2025 monthly operating reports.	0.10	50.00
05/11/25	ARP	Review March 2025 monthly operating reports (.9); and correspond with H. Valentine regarding March 2025 monthly operating reports (.1).	1.00	500.00
05/12/25	HJV	Review, redact and finalize bank statements/exhibits to the monthly operating reports (.4). Finalize for filing Debtors' monthly operating reports for March (1.0).	1.40	301.00
Total for 14			2.90	1,070.00
Total			96.30	\$43,667.00

Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	John D. Cornwell	JDC	690.00	9.90	6,831.00
Shareholder	Alexander R. Perez	ARP	500.00	58.30	29,150.00
Shareholder	Brenda L. Funk	BLF	600.00	2.50	1,500.00
Shareholder	Zachary (Zack) A. Schneider	ZAS	550.00	2.10	1,155.00
Paralegal	Heather J. Valentine	HJV	215.00	23.40	5,031.00
Total				96.20	\$43,667.00

Bill No Charge Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Amount</u>
Paralegal	Heather J. Valentine	HJV	0.10	21.50
Total			0.10	\$21.50

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
05/01/25	1.95 GB Active for May - Data Hosting Service (CS Disco)	39.04
Total		\$39.04

Cost Summary

<u>Description</u>	<u>Amount</u>
Data Hosting Service	39.04
Total	\$39.04

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Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	Case Administration/Noticing	0.30	100.00
02	General Bankruptcy Advice/Opinions	5.90	2,807.50
07	Employment and Fee Applications	19.70	7,351.50
08	Asset Disposition	60.50	28,664.00
11	Plan and Disclosure Statement	7.00	3,674.00
14	Reporting/MORs	2.90	1,070.00
Total		96.30	\$43,667.00

Outstanding Invoices

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Total Balance</u>
03/12/25	10552192	83,139.90	66,675.80	16,464.10
04/07/25	10554037	45,145.08	36,131.68	9,013.40
05/07/25	10556738	40,849.54	32,687.44	8,162.10
Total				\$33,639.60



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
Fax 214.855.7584
munsch.com

The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: June 19, 2025
Invoice Number: 10560466
Matter Number: 021990.00002

For Professional Services through May 31, 2025

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	43,667.00
Total Costs	\$	39.04
TOTAL THIS INVOICE	\$	43,706.04
Previous Balance	\$	33,639.60
Total Balance Due	\$	77,345.64

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.



Ross Tower
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The Aztec Fund Holding, Inc.
c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: July 10, 2025
Invoice Number: 10562181
Matter Number: 021990.00002

*For Professional Services through **June 30, 2025***

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	159,036.00
Total Costs	\$	<u>3,905.45</u>
TOTAL THIS INVOICE	\$	162,941.45
Previous Balance	\$	<u>43,706.04</u>
Total Balance Due	\$	206,647.49

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

Munsch Hardt Kopf & Harr, P.C.
Matter Number: 021990.00002
Invoice Number: 10562181
Client: The Aztec Fund Holding, Inc.
Matter Description: Chapter 11 Bankruptcy Cases

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Fee Detail

Task Code: 01 Case Administration/Noticing

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/02/25	HJV	Update docket with recent filings (.1). Attention to calendaring objection deadlines regarding fee applications (.1).	0.20	43.00
06/05/25	HJV	Finalize and file certificate of no objection regarding settlement motion (.4). Email with courtroom deputy regarding same (.1).	0.50	107.50
06/06/25	ARP	Correspond with C. Calvanico regarding Stretto's service of notice of winning bidders.	0.10	50.00
06/12/25	ARP	Correspond with C. Calvanico regarding service of sale orders.	0.10	50.00
06/13/25	HJV	Update docket with recent filings (.1). Attention to calendaring 7/14 hearing date (.1).	0.20	43.00
06/30/25	ARP	Correspond with A. Blanadet regarding duplicate fee application orders (.1); with C. Cu regarding service of final notice of assumption and assignment of contracts (.2).	0.30	150.00
Total for 01			1.40	443.50

Task Code: 02 General Bankruptcy Advice/Opinions

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/03/25	HJV	Confer with A. Perez regarding the 9019 settlement motion (.1). Prepare certificate of no objection regarding same (3). Prepare notice of intent to adduce testimony from a remote location (.2).	0.60	129.00
06/05/25	ARP	Multiple correspondences with A. Jimenez and D. Etges regarding issues related to antenna rents received by TAF DTC (.3); and review certificate of no objection related to 9019 insurance settlement and approve same for filing (.1).	0.40	200.00
06/25/25	ARP	Correspond with J. Gibbs following up regarding executed 9019 insurance settlement agreement.	0.10	50.00
06/26/25	ARP	Draft follow up correspondence to J. Gibbs regarding insurance settlement payment.	0.20	100.00
06/30/25	HJV	Email to A. Perez regarding Sompo's request for BANA wire instructions.	0.10	21.50
06/30/25	ARP	Multiple correspondences with J. Gibbs and T. Kiriakos and BANA team regarding execution and return of wire form.	0.20	100.00
Total for 02			1.60	600.50

Task Code: 05 Cash Collateral and Postpetition Financing

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/13/25	BLF	Conferences with J. Cornwell and A. Perez regarding next steps in case and status of budget.	0.20	120.00
06/16/25	BLF	Review cash collateral budget and develop estimates for remainder of case.	0.20	120.00
Total for 05			0.40	240.00

Task Code: 07 Employment and Fee Applications

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/02/25	HJV	Email to Jana Whitworth providing LEDES data (.1). Prepare Munsch Hardt's tenth monthly fee statement (.2).	0.30	64.50
06/17/25	HJV	Review and revise May invoice in preparation for the tenth monthly fee statement.	1.00	215.00
06/18/25	ARP	Prepare revisions to Munsch Hardt's May 2025 invoice.	0.50	250.00
06/19/25	JDC	Analysis of tenth monthly fee statement (.2). Communications with A. Perez regarding same (.1). Analysis of transmittal of same to notice parties (.1).	0.40	276.00
06/19/25	HJV	Revise tenth monthly fee statement (.5). Prepare final fee application and proposed order (.9).	1.40	301.00
06/19/25	ARP	Prepare final revisions to Munsch Hardt's tenth monthly fee statement (.5); draft correspondence to J. Whitworth, T. Kiriakos and other notice parties providing Munsch Hardt's tenth monthly fee statement (.1); and draft correspondence to C. Haddad and A. Jimenez providing Munsch Hardt's tenth monthly fee statement and May 2025 invoice (.1).	0.70	350.00
06/23/25	HJV	Review docket for certificate of service relating to third interim fee applications (.1). Email to Stretto regarding same (.1). Confer with B. Funk and A. Perez regarding notice of third interim fee applications and certificates of no objection (.5).	0.70	150.50
06/23/25	ARP	Multiple correspondences with B. Funk, H. Valentine, and J. Baumgartner regarding service of Munsch Hardt and Getzler Henrich's third interim fee applications (.2); and work sessions with B. Funk and H. Valentine regarding issues related to service of Munsch Hardt and Getzler Henrich's third interim fee applications (.3).	0.50	250.00
06/25/25	HJV	Revise final fee application (.2). Revise CNO for Munsch Hardt (.2). Prepare CNO for Getzler Henrich (.5). Prepare exhibits regarding same (.1).	1.00	215.00
06/26/25	ARP	Revise certificates of no objection to third interim fee applications of Munsch Hardt and Getzler Henrich.	0.20	100.00
06/27/25	HJV	Finalize and file certificates of no objection pertaining to the third interim fee applications for Munsch Hardt and Getzler Henrich (.1). Email to court deputy regarding same (.1).	0.20	43.00
06/27/25	ARP	Correspond with A. Jimenez and J. Baumgartner regarding outstanding amounts related to Third Amended Fee Application for Munsch Hardt.	0.40	200.00

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06/30/25	HJV	Revise final interim fee application (.2). Email to P. Delatte regarding June invoice (.1).	0.30	64.50
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Total for 07	7.60	2,479.50
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Task Code: 08 Asset Disposition

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/02/25	BLF	Conferences with J. Cornwell and A. Perez regarding status of sales and confirmation matters (.7); coordination conference with Mayer Brown team and J. Cornwell and A. Perez regarding sales (.5); conference with Eastdill team on bids (.6).	1.80	1,080.00
06/02/25	HJV	Attention to setting up and scheduling zoom auctions (.2). Email to Veritext with zoom links and details pertaining to the auctions (.1). Work session with A. Perez regarding sale orders (.3). Research regarding deeds of trust pertaining to Bowie, Mark Center, and Windward Oaks properties (.3). Confer with A. Perez regarding same (.1).	1.00	215.00
06/02/25	ARP	Draft proposed sale order for Mark Center (2.5); phone conference with J. Cornwell, B. Funk, and T. Kiriakos and Mayer Brown team regarding bid issues and procedures (.5); phone conference with J. Cornwell, B. Funk, T. Kiriakos and Mayer Brown team, B. Allen and Eastdil team, and G. Katunas regarding bids and bidding procedures for Mark Center and Bowie (.6); multiple work sessions with J. Cornwell and B. Funk regarding issues related to bids, bidding procedures, and SPA limited objection (.8); review bids and supporting documents for Mark Center and Bowie and related correspondence (2.1); multiple correspondences L. Holl Chang, B. Allen, and J. Bakshi regarding posting of document to data room (.3); and work session with H. Valentine regarding preparation of draft sale order for Bowie and Windward oaks (.3).	7.10	3,550.00
06/02/25	JDC	Preliminary analysis of various purchase offers and corresponding email communications from brokers (.6). Conference with team regarding offers, auction procedures, and related strategy (.4). Clarifying and process email communications with potential bidders (.2). Email communications with BANA team regarding bids (.1). Conference with Mayer Brown team to discuss same (.5). Continued review of incoming offers (.3). Analysis of offer summary from Cushman team (.1). Analysis of SPA estoppel certificate (.1). Various scheduling email communications with brokers and BANA team (.2). Detailed review of Mark Center and Bowie bid forms and, where provided, PSA mark-ups (1.6).	4.10	2,829.00

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06/03/25	HJV	Review bid offers and prepare for zoom auctions (.6). Prepare sale order for Windward Oaks (.9). Prepare sale order for Bowie (.8). Email to A. Perez regarding same (.1). Working session with A. Perez regarding logistics for auctions and upcoming deadlines (.3). Working session with B. Funk, A. Perez, and J. Cornwell regarding auctions and upcoming deadlines (.5). Attention to preparing for the auctions and logistics regarding same (.5).	3.70	795.50
06/03/25	ARP	Conduct review of bids and supporting documents for Bowie and Mark Center (.8); case strategy work sessions with J. Cornwell and B. Funk regarding review of bids for Mark Center and Bowie (.7); phone conference with J. Cornwell, B. Funk, T. Kiriakos, L. Holl Chang, and J. Kellner regarding evaluation of bids, qualification of bidders, and related issues (.6); phone conference with J. Cornwell, B. Funk, D. Dorros and Eastdil team, T. Kiriakos and Mayer Brown team, and G. Katunas regarding evaluation of bids, qualification of bidders, auction procedures, and related issues (.5); phone conference with C. Haddad providing auction and case updates (.4); conduct review of bids and supporting documents for Windward Oaks (1.0); phone conference with J. Cornwell, B. Funk, T. Kiriakos, and L. Holl Chang regarding analysis of Windward Oaks bids (.5); phone conference with J. Cornwell, B. Funk, D. Meline and Cushman team, T. Kiriakos and Mayer Brown team, and G. Katunas regarding analysis of Windward Oaks bids and related issues (.5); case strategy conference with J. Cornwell and B. Funk regarding bid analyses and related issues (.9); draft correspondence to L. Zicchinella regarding question related to title commitment (.2); draft correspondence to Z. Schneider regarding review of special warranty deeds and related issues (.2); phone conferences with D. Meline regarding extension of notice of bid qualification deadline for Windward Oaks auction and related issues (.3); multiple correspondences with D. Meline regarding notification of extension of qualification deadline for Windward Oaks auction (.2); correspond with J. Baumgartner and A. Jimenez regarding current payables for Bowie and Mark Center (.2); confer with H. Valentine regarding auction logistics (.3); revise draft sale orders for Bowie and Windward Oaks (1.1); and draft correspondence to L. Holl Chang regarding draft sale orders (.2).	8.60	4,300.00
06/03/25	BLF	Prepare for and attend conference with J. Cornwell and A. Perez regarding status of case matters and sales process (.8); conference with Mayer Brown team and J. Cornwell and A. Perez regarding evaluation of bids in connection with sale of Mark Center and Bowie (.8); conference with MHKH, Mayer Brown team and Eastdil team (.5); review bid packages for Windward Oaks sale in advance of conference with broker team (.3); conference with MHKH team, Broker team, and Mayer Brown team regarding bid packages for Windward Oaks sale (1); further conference with J. Cornwell and A. Perez regarding strategy for auction process for all three office buildings (.8).	4.20	2,520.00

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06/03/25	JDC	Additional review of Mark Center and Bowie offer documents and notes in preparation for meetings (.3). Conference with B. Funk and A. Perez regarding bidder qualification and auction strategy (.6). Conference with Mayer Brown team regarding same (.7). Conference with A. Perez regarding bidder follow-up strategy (.1). Conference with Eastdil strategy regarding auctions procedure decisions and initial bidder assessment considerations (.5). Analysis of Windward Oaks bid package, including PSA mark-ups (1.3). Conference with Mayer Brown team regarding same (.5). Conference with Cushman team regarding auctions procedure decisions and initial bidder assessment considerations (.5). Various follow-up email communications regarding sales process with broker and BANA teams (.4). Conference with A. Perez regarding sale order drafting status and strategy (.2).	5.10	3,519.00
06/04/25	HJV	Confer with A. Perez regarding sale orders (.1). Confer with A. Perez regarding auction logistics (.1). Emails with Veritext confirming logistics for auctions for 6/5 and 6/6 (.3). Email to B. Funk with zoom details for Eastdil (.1). Prepare for zoom auctions (3.0). Prepare notice of sale hearing and proposed final sale orders (.5). Gather documents for B. Funk in preparation for auctions (.5).	4.60	989.00
06/04/25	ZAS	Review the revise form special warranty deeds for the three properties and prepare comments to the same (1.0). Review Bank of America's comments to the Maryland and Virginia deeds and prepare responses to the same (0.5).	1.50	825.00
06/04/25	ARP	Phone conferences with J. Cornwell, B. Funk, Matt Joe, T. Kiriakos and Mayer Brown team regarding proposed revisions to draft PSA (1.2); phone conference with M. Millard regarding bidder qualification and auction processes (.2); multiple phone conferences with L. Holl Chang regarding bidder qualification and proposed revisions to by Lincoln to the Windward Oaks PSA (1.3); multiple correspondences with Z. Schneider regarding comments to proposed forms of deeds (.6); phone conference with Z. Schneider regarding changes proposed by Lincoln to form Limited Warranty Deed for Windward Oaks (.5); prepare revisions to Lincoln PSA for Windward Oaks (2.7); multiple correspondences with M. Joe regarding proposed revisions to Lincoln's form of PSA for Windward Oaks (1.4); draft correspondence to L. Holl Chang following up on proposed sale orders (.1); and multiple correspondences with D. Meline and team regarding bidder notifications for Windward Oaks auction (.7).	8.70	4,350.00
06/04/25	JDC	Analysis of and comments to Tioga bid and PSA mark-up (.5). Conference with Mayer Brown and Tioga counsel to discuss same (1.0). Conference with A. Perez regarding auction preparation (.1). Conference with A. Perez and B. Funk regarding same (.2). Telephone conference with Lisa Holl Chang and A. Perez regarding Tioga issues and bidder qualification strategy (.2). Follow-up communications with Tioga counsel (.2). Various email communications with BANA team regarding bidder qualification (.3). Conference with Tom	5.10	3,519.00

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		Kiriakos and Lisa Holl Chang regarding bidder qualification and auction procedure (.3). Analysis of revisions and Tioga PSA from B. Funk (.2). Coordination with team regarding confirmation to each qualified bidder and transmittal of Zoom instructions (.2). Conference with Eastdil and BANA teams to discuss Mark Center and Bowie auction (.3). Analysis of email response from Z. Schneider regarding comments to deeds and related proposed buyer revisions (.2). Analysis of email response from Chirag Shah regarding various buyer inquiries (.1). Analysis of Cushman update regarding Corners Properties bid (.1). Various email communications with qualified bidders regarding process and procedure (.2). Analysis of redline PSA from Tioga's counsel (.2); related coordination with A. Perez regarding same and various other pre-auction strategy matters (.3). Preliminary analysis of revisions to draft sale order from Lisa Holl Chang (.1). Final preparation of materials and notes prior to Mark Center and Bowie auctions (.4).		
06/04/25	BLF	Conference with Windward Oaks buyer regarding status (.1); multiple conferences with Mayer Brown team and J. Cornwell regarding sales (.7); attend to PSA and auction preparations (1.3); multiple correspondence regarding qualified bidders, tax matters, and requested information regarding building repair projects for parties (.7).	2.80	1,680.00
06/05/25	BLF	Prepare for and attend auctions for Mark Center and Bowie properties.	5.80	3,480.00
06/05/25	JDC	Preparation for auctions, including final coordination with MHKH and BANA teams (.6). Attendance of and participation in virtual auction for Mark Center property (2.2). Preparation with team and, in part, BANA team for Bowie auction (.8). Attendance and participation in Bowie property auction (1.2). Post-auction communications with BANA team (.2). Analysis of various email communications with winning and back-up bidders regarding PSA finalization, executory contract schedules completion, deposit payment, and related closing matters (.5). Analysis of LOC update from Cushman regarding Corners Properties bid (.1). Coordination with A. Perez and B. Funk regarding final preparations from Windward Oaks auction (.3). Coordinating email communications with BANA regarding bidder qualification for Corners (.1). Communications with A. Perez regarding post-auction communications and winning bidder confirmation emails to parties; and final Windward Oaks auction preparations (.3).	6.30	4,347.00
06/05/25	HJV	Prepare for and attend Bowie and Mark Center auctions (6.4). Revise and finalize for filing notice of sale hearing and proposed final sale orders; revise and finalize for filing sale orders for Mark Center, Bowie, and Windward Oaks (3.1).	9.50	2,042.50
06/05/25	ARP	Attend auctions for Mark Center and Bowie properties (4.6); review changes proposed by counsel for BANA to proposed sale order for Mark Center (.5); work sessions with H. Valentine regarding preparation of revised proposed sale orders for Bowie and Windward Oaks (.5); prepare revisions	9.50	4,750.00

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to draft notice and proposed forms of sale order for Bowie and Windward Oaks (1.1); multiple correspondences with T. Kiriakos and team relating to revised proposed sale orders (.2); multiple correspondences with M. Joe providing resolution to final Lincoln PSA issues and qualification as bidder (.5); multiple phone conferences with L. Holl Chang regarding final Windward Oaks bidder qualification issues (.3); draft correspondence to D. Meline and M. Millard providing instruction regarding dissemination of initial bid for Windward Oaks (.3); multiple phone conferences with M. Millard regarding bidder qualification and auction follow up issues (.3); draft correspondence to L. Holl Chang and D. Meline regarding bidder qualification updates (.4); draft correspondences to D. Muse, A. Ebrani, and S. Afshani regarding winning and backup bids at auction and related follow up (.6); and draft correspondences to C. Haddad and J. Baumgartner regarding winning and backup bids for Mark Center and Bowie (.2).

06/06/25	ARP	Prepare for and conduct auction for Windward Oaks property (2.1); correspond with M. Joe regarding details for Lincoln's participation at Windward Oaks auction (.1); draft correspondence to D. Meline and L. Holl Chang following up on Windward Oaks auction results (.3); multiple correspondences with A. Jimenez regarding receipt of deposits from winning bidders for Mark Center and Bowie (.6); multiple correspondences with C. Lazarian following up on issues related to winning bid for Bowie property (.7); correspond with T. Bartlett regarding back up bid for Windward Oaks (.3); correspond with A. Ebrani and J. Sabzevari following up on winning bid for Bowie and related issues (.4); correspond with C. Haddad and J. Baumgartner regarding winning and back up bid for Windward Oaks (.3); multiple correspondences with D. Muse regarding winning bid for Mark Center and related issues (.4); correspond with T. Kiriakos and L. Holl Chang regarding Bowie PSA (.1); correspond with C. Shah responding to question about cure schedule (.2); correspond with T. Kiriakos and L. Holl Chang regarding updated PSA forthcoming from Windward Oaks winning bidder (.1); phone conference with D. Muse confirming wire instructions (.1); phone conference with B. Funk and J. Baumgartner regarding follow up on sale and plan items (.4); multiple correspondences with G. Katunas and T. Kiriakos regarding receipts of bid deposits (.4); prepare notice of winning bidders for Mark Center, Bowie, and Windward Oaks (1.3); and draft correspondence to D. Muse, C. Lazarian, and A. Ebrani regarding notice of winning bidders (.3).	8.10	4,050.00
06/06/25	JDC	Attendance of and participation in Windward Oaks auction (1.4). Follow-up email communication with Cushman team (.1). Email communications with BANA team regarding finalizing PSAs and soliciting sale order revisions to debtors' form order (.2). Various email communications with representatives of winning bidders regarding deposit	2.50	1,725.00

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		payments and documentation finalization (.3). Communications with B. Funk and A. Perez regarding auction completion and next steps (.2). Analysis of update email to Charles Haddad from B. Funk (.1). Continued email communication with Cooley team regarding Mark Center PSA changes and executory contract assumption decisions (.1). Analysis of draft notice of winning bidders from A. Perez (.1).		
06/06/25	BLF	Prepare for and attend auction for Windward Oaks property (1.6); correspondence with counsel for BANA regarding sales (.1); attend to mark center sale matters and correspondence with counsel for buyer and BANA regarding same (.2); conference with A. Perez regarding outstanding matters on sale documents (.3).	2.20	1,320.00
06/06/25	HJV	Prepare for and attend Windward Oaks zoom auction (1.4). Prepare notice of winning bidders (1.9). Conferences with A. Perez regarding status of winning bidders' assumption of contracts and notice of successful bidders (.3). Revise notice of winning bidders (.9).	4.50	967.50
06/08/25	ARP	Draft correspondence to Z. Zicchinella and S. Lang regarding revised title commitment for Windward Oaks (.2); prepare draft declarations for D. Meline and D. Dorros in support of auction sales (1.7); and draft correspondences to D. Meline and D. Dorros regarding their draft declarations and attendance at sales hearing (.4).	2.30	1,150.00
06/09/25	ARP	Revise notice of cancellation of Westway auction and designation of winning bidder (.2); multiple correspondences with A. Ebrani, A. Merovitch, B. Chafe regarding proposed sale order, executory contracts, and related sale issues For Bowie (.8); multiple correspondences with C. Breed regarding follow up issues related to Mark Center purchase (.6); case strategy team meeting with B. Funk, J. Cornwell, and H. Valentine regarding follow up sale and confirmation tasks (.9); work sessions with H. Valentine regarding collection of executory contracts and preparation of exhibits (.5); multiple correspondences with C. Shah and A. Jimenez regarding collection of executory contract information (.4); multiple correspondences with M. Millard and A. Jimenez regarding receipt of Windward Oaks deposit from winning bidder (.4); multiple correspondences with C. Lazarian regarding follow up to PSA, sale order, deposit, and related sale issues (.9); prepare revisions to draft declaration of David Dorros (.9); correspond with B. Eisenbach regarding draft declaration of David Dorros (.2).	5.80	2,900.00
06/09/25	JDC	Various email communications with brokers regarding declaration revisions and hearing preparation (.4). Conference with A. Perez regarding sale hearing preparations and strategy (.2). Review of revisions to draft Mark Center sale order (.2). Related email communications with Mayer Brown and MHKH teams (.1). Communications with team regarding buyers' selection of contracts for assumption and timing relative to confirmation and effective date planning (.2). Conference with B. Funk, A. Perez, and H. Valentine	1.80	1,242.00

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		regarding final preparations for sale hearings (.4). Follow-up conference with A. Perez and H. Valentine regarding finalizing various declarations and witness and exhibit list (.3).		
06/09/25	GET	Draft, review and revise Assignment and Assumption of Membership Interest and circulate to B. Funk for review.	0.80	288.00
06/09/25	HJV	Revise cancellation notice of Westway auction (.5). Finalize for filing (.2). Confer with A. Perez regarding additional buildings contracts related to Mark Center (.1). Gather contracts for Mark Center property (.5). Working sessions with A. Perez, J. Cornwell, and B. Funk regarding next steps (.9). Revise witness and exhibit list (.2). Revise Agenda (.1). Prepare notice of filing confirmation order (.3). Prepare notice of filing of Westway Assignment and PSA (.3). Prepare Notice of Revised Sale Order and Redline for Bowie (.5). Prepare Notice of Revised Sale Order and Redline for Mark Center (.5). Prepare Notice of Revised Sale Order and Redline for Windward Oaks (.5). Revise voting tabulation received from Stretto (.2). Review monthly operating reports and redactions in preparation for filing (.2).	5.00	1,075.00
06/09/25	BLF	Review sale order for Mark Center and transmit to counsel for BANA for review (.1); review and comment on notice of cancellation of auction for Westway equity (.2); multiple correspondence regarding executory contracts (.2).	0.50	300.00
06/10/25	JDC	Coordination with team regarding status of PSA revisions and notice filings (.2). Analysis of SPA witness and exhibit list (.1). Analysis of A. Perez revisions to draft Cushman declaration (.2). Final review of Eastdil declaration (.2). Conference with team to discuss status and strategy relating to sale hearing (.3).	1.00	690.00
06/10/25	ARP	Prepare revisions to draft declarations of D. Meline and D. Dorros in support of property sales (1.2); multiple correspondences with D. Meline and D. Dorros regarding their draft declarations supporting the property sales and attendance at the sale hearing (.8); coordinate with L. Holl Chang regarding final revisions to draft declarations of D. Meline and D. Dorros (.3); coordinate with R. Eisenbach regarding final revisions to draft declaration of D. Dorros (.4); prepare final versions of declarations for D. Meline and D. Dorros (.6); correspond with R. Eisenbach regarding withdrawal of SPA's limited objection to the sale (.1); correspond with B. Chafe and Namdar team regarding proposed sale order and PSA for Bowie (.1); correspond with C. Lazarian regarding proposed sale order for Windward Oaks (.1); multiple correspondences with L. Holl Chang regarding open issues related proposed sale orders and PSAs (.5); multiple work sessions with B. Funk and H. Valentine regarding preparation of and revisions to sale orders, declarations, and PSAs (1.2); draft proposed language for Mark Center proposed sale orders related to extension of time for final notice to contract counterparties (.4); correspond with L. Channell providing update regarding sale of Windward Oaks (.2); correspond with A. Merovitch regarding issues	7.50	3,750.00

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		related to Bowie proposed order and PSA (.3); phone conference with A. Merovitch regarding open issues related to Bowie sale (.2); phone conference with C. Lazarian and B. Funk regarding open issues related to Windward Oaks sale (.3); draft correspondences to C. Lazarian providing title commitment and survey and making an introduction to L. Channell with Hines (.1); correspond with T. Kiriakos and L. Holl Chang regarding additional sale order language for Mark Center and Bowie (.2); correspond with L. Holl Chang regarding proposed revision to PSA made by Windward Oaks purchaser (.2); and prepare final form of sale order for Bowie (.3).		
06/10/25	BLF	Review and revise sale order for Mark Center and notice regarding same.	0.20	120.00
06/11/25	JDC	Communications with purchasers regarding final approval of respective sale orders (.3). Conferences with B. Funk and A. Perez regarding exhibit finalization, including sale orders and supporting declarations (.3). Email communication with Cooley team regarding withdrawal of SPA objection (.1). Analysis of notice of withdrawal of same (.1). Final review of Windward Oaks sale order and filing of same (.3).	1.10	759.00
06/11/25	BLF	Correspondence with counsel for Mark Center tenant regarding status of objection to assumption of lease (.1); coordination meeting with A. Perez regarding status of sale matters (.2); review assignment and assumption for Westway (.3); status conference with counsel for BANA (.3); conference with counsel for Mark Center buyer regarding contract assumption (.1).	1.00	600.00
06/11/25	ARP	Phone conference with T. Kiriakos, L. Holl Chang, and J. Kellner regarding final issues and open items in advance of confirmation and sale hearing (.3); prepare final sale orders, including final PSAs, and related redlines (1.5); multiple work sessions with B. Funk and J. Cornwell regarding final exhibits and orders for confirmation and sale hearing (1.2); prepare final exhibits to witness and exhibit list for confirmation and sale hearing (.9); draft correspondences to D. Meline, D. Dorros, and D. Meline regarding participation and attendance at sale hearing (.3); correspond with A. Merovitch regarding proposed sale order for Bowie (.1); draft correspondence to J. Monsour providing responses to questions about draft proposed sale order for Windward Oaks (.2); phone conference with J. Monsour regarding proposed sale order for Windward Oaks (.2); multiple correspondences with A. Simon regarding items needed for Windward Oaks closing and responses to Windward Oaks purchaser (.2); correspond with L. Holl Chang providing draft purchase and sale agreements (.2); draft correspondence to L. Channell regarding provision of information to Windward Oaks purchaser (.2); and phone conference with L. Channel regarding responsive strategy to Windward Oaks purchaser (.1).	5.40	2,700.00

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06/12/25	ARP	Prepare for and attend confirmation and sale hearing (2.4); multiple correspondences with D. Dorros regarding attendance at sale hearing and issues related thereto (.1); multiple correspondences with C. Lazarian and L. Channell regarding follow up questions related to sale of Windward Oaks (.6); and review sale orders for Mark Center, Bowie, and Windward Oaks entered by the Court (.3).	3.40	1,700.00
06/13/25	ARP	Phone conference with J. Lavoie and C. Breed regarding Mark Center sale and executory contracts (.3); correspond with A. Merovitch regarding entry of Bowie sale order (.1); and correspond with J. Lavoie and C. Breed regarding Mark Center contracts (.2).	0.60	300.00
06/16/25	JDC	Telephone conference with Charles Haddad regarding recent hearing, sale closing status, and related matters (.3). Conference with MHKH team coordinating sale closing and Effective Date planning (.5). Analysis of update email regarding budgeting and cash position from B. Funk to Tom Kiriakos and Mayer Brown team (.1). Communication with B. Funk regarding same (.1).	1.00	690.00
06/16/25	ARP	Correspond with C. Breed regarding executory contract issues related to Mark Center (.2); phone conference with B. Funk, J. Lavoie, and C. Breed regarding executory contract issues related to Mark Center (.1); correspond with C. Shah regarding executory contract issues related to Mark Center (.2); correspond with A. Merovitch regarding executory contract issues related to Bowie (.1); correspond with L. Channell regarding reimbursement request from Met Club (.2); correspond with L. Zicchinella regarding entry of sale orders and closing checklists (.4); review invoice for Cushman & Wakefield and related documents circulated by A. Simon for closing of Windward Oaks sale (.1); and correspond with A. Simon regarding same (.1).	1.40	700.00
06/16/25	BLF	Prepare for and attend MHKH team meeting regarding asset sale closings and effective date preparations (.5); prepare for and attend conference with counsel for Mark Center buyer regarding contracts (.3); correspondence with A. Perez regarding cure amounts for contract assumption (.1).	0.90	540.00
06/17/25	ARP	Multiple correspondences with C. Shah and C. Breed regarding executory contracts for Mark Center (.3); phone conference with A. Merovitch regarding follow up items for Bowie sale (.3); multiple correspondences with L. Channell regarding (.3); analyze agreed form of PSA for Windward Oaks regarding issues related to assumption and assignment of unexpired leases (.4); correspond with J. Monsour regarding Windward Oaks sale order (.1); and prepare final execution version of Bowie PSA (.3); and review correspondence from A. Merovitch regarding final Bowie executory contract exhibit and issues related to closing (.1).	1.80	900.00
06/18/25	ARP	Multiple correspondences with J. Cruz regarding executory contracts for Mark Center (.5); phone conferences with J. Cruz and C. Breed regarding executory contracts for Mark	3.20	1,600.00

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		Center (.2); review additional Mark Center executory contracts (.2); phone conference with C. Haddad and G. Zarate regarding sale and wind down process issues (.4); multiple correspondences with A. Merovitch and T. Kiriakos regarding Bowie sale issues (.6); prepare assignment form for related to Bowie PSA (.9); multiple correspondences with C. Breed and J. Lavoie regarding execution of Mark Center PSA (.4).		
06/19/25	ZAS	Review the lease for the Metropolitan Club at Windward Oaks as it relates to the TI allowance provided for in the 3rd amendment to lease and the seller's obligation to pay the same (0.6). Call with A. Perez regarding the Metropolitan Club lease and the tenant improvement allowance provisions (0.5).	1.10	605.00
06/19/25	HJV	Review trial exhibits for CapEx summary to send to Chirag Shah, per his request (.3). Related communication with A. Perez regarding same (.1). Email to Chirag Shah with CapEx exhibit (.1). Receipt and review auction transcripts and accompanying invoices (.2). Receipt and organize of documents regarding Windward Oaks from Hines and The Metropolitan Club (.1).	0.80	172.00
06/19/25	HJV	Emails to Charles Haddad regarding Mark Center PSA (.1). Email to C. Haddad regarding Bowie PSA (.1). Email to C. Haddad regarding Windward Oaks PSA (.1).	0.30	64.50
06/19/25	BLF	Conferences with A. Perez regarding status of sale process and open issues (.1); review documents and conference with A. Perez regarding TI liability under WWO lease (1.1).	1.20	720.00
06/19/25	ARP	Correspond with J. Kellner providing status update regarding sale (.1); review Eastdil's invoices related to sales of Bowie and Mark Center (.2); multiple correspondences with L. Channell regarding Windward Oaks expense issue (.5); work sessions with B. Funk regarding Windward Oaks expense issue (.6); multiple correspondences with C. Breed regarding execution of Mark Center PSA (.3); multiple work sessions and correspondences with H. Valentine regarding collection of executed PSAs (.5); phone conference with L. Channell and S. Johnson regarding Windward Oaks expense issue (.5); phone conference with Z. Schneider regarding Windward Oaks expense issue (.5); conduct preliminary review of evidence supporting Windward Oaks expenses (.3); prepare revisions to assignment of Bowie PSA (.3); multiple correspondences with A. Merovitch regarding Bowie PSA and assignment execution (.3); review and approve invoices for auction transcription services (.1); correspond with L. Zicchinella providing Eastdil invoice for Mark Center (.1).	4.30	2,150.00
06/20/25	ARP	Review fully executed Bowie PSA from A. Merovitch (.1); correspond with A. Merovitch regarding same; and review correspondence from L. Channell regarding Windward Oaks expense issue (.2).	0.40	200.00
06/22/25	ARP	Case strategy work session with Z. Schneider regarding documents and items to be collected for closing the sale of each of Mark Center, Bowie, and Windward Oaks and related sale follow up issues (2.4); multiple correspondences with C.	3.20	1,600.00

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		Lazarian regarding Windward Oaks sale (.4); draft correspondence to L. Channell and A. Jimenez regarding Windward Oaks expense issue (.2); draft correspondence to C. Shah, A. Jimenez, and J. Cruz regarding items and information needed related to Mark Center and Bowie sales (.2).		
06/22/25	ZAS	Call with A. Perez regarding outstanding items for the Mark Center, Bowie and Windward Oaks closings (2.4). Prepare closing documents for Mark Center (0.7). Prepare closing documents for Windward Oaks (0.5). Prepare closing documents for Bowie Center (0.7). Review additional correspondence regarding the Metropolitan Club lease and TI allowance (0.3).	4.60	2,530.00
06/23/25	HJV	Compile and organize documents for closings (.3). Confer with A. Perez regarding closing documents to send to Charles Haddad today (.1). Compile and revise PSA for WWO to include correct effective date and The Metropolitan Club security deposit amount (.2). Prepare final sale documents and packages for Bowie, Mark Center, and Windward Oaks and send to Charles Haddad (3.7). Work session with Z. Schneider regarding same (.3).	4.60	989.00
06/23/25	BLF	Conference with A. Perez regarding amendment to Met Club lease and TI request for payment.	0.20	120.00
06/23/25	ARP	Multiple correspondences with Z. Schneider and H. Valentine regarding documents for execution as part of sales (.4); multiple work sessions with Z. Schneider and H. Valentine regarding documents for execution as part of sales and related issues (.8); multiple correspondences with L. Zicchinella and S. Lang regarding items for closing of Bowie and Windward Oaks sales (.8); correspond with Z. Schneider regarding The Metropolitan Club expense issue and Fourth Amended to the lease (.1); phone conference with L. Channell regarding The Metropolitan Club TI expense issue (.3); review Fourth Amendment to lease with The Metropolitan Club (.3); phone conference with M. Millard regarding sale items requested from Cushman & Wakefield related to Bowie sale (.1); correspond with A. Simon regarding sale items requested from Cushman & Wakefield related to Bowie sale (.1); correspond with A. Jimenez regarding review of items related to The Metropolitan Club TI expense (.3); phone conference with B. Allen regarding closing status and deliverables from Eastdil (.1); correspond with T. Kiriakos and J. Kellner regarding The Metropolitan Club TI expense issue (.4); correspond with M. Howe regarding local issues related to sales of Bowie and Mark Center (.4); multiple correspondences with A. Merovitch regarding the PSA assignment and deed for Bowie (.5); revise PSA assignment and deed for Bowie per comments from A. Merovitch (.2); correspond with C. Haddad regarding instructions for execution and return of documents for closing (.3).	5.10	2,550.00
06/23/25	ZAS	Prepare draft closing documents for Mark Center (2.0). Prepare draft closing documents for Windward Oaks (2.0).	7.80	4,290.00

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		Prepare draft closing documents for Bowie Center (1.7) Review the closing document packets for Charles Haddad's signature (0.5). Review additional lease documents for The Metropolitan Club in Windward Oaks and prepare further comments regarding the outstanding tenant improvement balance and the seller's obligation to pay the same (0.8). Review correspondence with title and purchasers regarding outstanding items for closing (0.4). Review correspondence regarding the closing statements, tax prorations, cure costs, and other closing statement charges and credits for the three properties (0.3). Correspond with Bowie Center purchaser's counsel regarding the draft deed (0.1).		
06/24/25	ZAS	Correspond with Bank of America local counsel regarding the Virginia and Maryland tax forms required by title (0.2). Order the certified entity documents for the seller entities (0.2). Correspond with Michael Howes regarding the Maryland attorney certification for the Bowie Center deed (0.2). Review correspondence regarding the broker lien waivers for Windward Oaks (0.1). Review correspondence from title regarding the Maryland and Virginia deeds (0.4). Correspond with title regarding outstanding items for closing and the closing statements (0.3). Review the status of outstanding items for closing (0.5). Review correspondence regarding the execution and delivery of seller closing documents (0.1). Correspond with A. Perez and Amanda Jimenez regarding the operating agreement for OME Windward Oaks, LLC (0.2).	2.20	1,210.00
06/24/25	BLF	Draft, review and revise assignment and assumption agreement for transfer of Westway equity.	0.60	360.00
06/24/25	ARP	Multiple correspondences with M. Howes and K. Johnson regarding issues related to collection of MD attorney signature and other issues related to Bowie deed (.3); draft follow up correspondence to C. Shah and J. Cruz regarding information and items requested related to Mark Center and Bowie (.1); multiple correspondences with A. Simon and S. Lang regarding signed lien waiver and invoice from Cushman & Wakefield (.4); multiple correspondences with A. Jimenez regarding operating agreement for OME Bowie (.2); review correspondence from L. Channell and A. Jimenez regarding Windward Oaks TI reimbursement issue (.3); and work session with Z. Schneider regarding follow up tasks and open items for title company (.1).	1.40	700.00
06/25/25	HJV	Meet and confer with A. Perez regarding status of sales process and next steps (.1). Email to Z. Schneider regarding same (.1). Review signed documents received from Charles Haddad to ensure all signatures are collected (.2). Working session with Z. Schneider and A. Perez regarding closing documents and punch list items (.5). Working session with B. Funk, A. Perez, and J. Cornwell regarding state of winddown, closing on all properties, and final fee application (.5). Email to title confirming receipt of signed closing package (.1). Attention to ordering certified copies of sale orders for closing per title's request (.5).	2.00	430.00

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06/25/25	HJV	Meet with A. Perez regarding status of sales documents, final fee application, and other various closing matters.	0.20	43.00
06/25/25	JDC	Team meeting with B. Funk, A. Perez, and H. Valentine regarding comprehensive sale closing issues and coordination (.5). Email communication with T. Kiriakos regarding closing coordination and related scheduling communications with Mayor Brown team (.1). Conference with B. Funk and A. Perez regarding status of closing statements, communications with title company, and related strategy (.2).	0.80	552.00
06/25/25	BLF	Attend to correspondence related to expenses and building sales.	0.20	120.00
06/25/25	ZAS	Review the updated survey for Windward Oaks and prepare comments to the same (0.3). Review the executed seller closing documents and prepare comments to the same (0.6). Status conference with A. Perez and B. Funk (0.4). Correspond with buyer's counsel regarding draft closing documents and the closing statement for Mark Center (0.5). Correspond with Michael Howes regarding title's comments to the Maryland and Virginia deeds (0.5). Correspond with Alan Merovitch regarding the closing documents and settlement statement for Bowie Center (0.2). Correspond with Chaz Lazarian regarding the closing documents for Windward Oaks (0.3). Correspond with title regarding the revised deeds and outstanding items for closing (0.2). Review correspondence regarding July rents received by seller (0.1). Review the Seller's reconfirmation of representations and warranties for Mark Center and correspond with Connor Breed regarding the same (0.2).	3.30	1,815.00
06/25/25	MEW	Order certified copies of certificates of formation and good standing certificates for OME 2001 Mark Center, LLC, OME Windward Oaks, LLC, OME Bowie Corporate Center, LLC, and Aztec OME Holdings, Inc. from the applicable states of DE, MD, GA, and VA.	0.30	96.00
06/25/25	ARP	Case strategy work session with Z. Schneider and H. Valentine regarding open items for closing of three property sales (.5); case strategy conference with J. Cornwell, B. Funk, and H. Valentine regarding open items and tasks in advance of the plan effective date (.5); correspond with C. Haddad regarding follow up issue related to Westway Equity sale (.2); correspond with A. Simon regarding survey for Windward Oaks (.1); multiple correspondences with C. Shah, J. Cruz, A. Jimenez, and L. Channell regarding documents and information needed related to the sale closings (.4); correspond with C. Breed and J. Lavoie regarding items for Mark Center closing (.1); multiple correspondences with Z. Schneider regarding open items related to sales (.2); and correspond with T. Kiriakos and J. Kellner regarding sales coordination (.1).	2.10	1,050.00
06/26/25	ZAS	Review the terms of the contracts and correspond with A. Perez and Bank of America regarding release of liens from Bank of America for each of the three properties (0.7).	5.50	3,025.00

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		Correspond with Chaz Lazarian regarding purchaser's closing documents for Windward Oaks (0.4). Correspond with Serena Lang regarding closing documents (0.2). Review the certified entity documents for the seller entities (0.5). Correspond with title regarding the seller entity documents (0.2). Confer with A. Perez and B. Funk regarding OME Bowie Center's standing in Maryland and appointing a registered agent (0.4). Revise the title affidavits and correspond with title regarding the same (0.4). Revise the Maryland and Virginia deeds and correspond with Michael Howes regarding the same (0.8). Review the status of outstanding items for closing and prepare for closing (0.6). Prepare closing instruction letters (1.5).		
06/26/25	BLF	Monitor status of sales processes and numerous conferences and correspondence regarding same.	3.10	1,860.00
06/26/25	JDC	Various conferences with team regarding closing issues.	0.40	276.00
06/26/25	ARP	Multiple work sessions with Z. Schneider and B. Funk regarding items and issues related to property closings (1.8); phone conference with T. Kiriakos, J. Kellner, and Munsch Team regarding sale closings and deliverables from BANA (.2); multiple correspondences with A. Simon regarding Windward Oaks property survey (.3); multiple correspondences with T. Kiriakos and G. Katunas regarding wire instructions for BANA (.3); multiple correspondences with J. Ginley regarding certain requested corporate documents (.2); multiple correspondences with S. Lang and A. Golenko regarding delivery of items needed for closings and related issues (2.1); multiple correspondences with B. Allen and C. Breed regarding issues related to Mark Center closing (.3); correspond with J. Baumgartner, B. Funk, and Hines teams regarding accounts payable (.3); correspond with L. Channell and A. Jimenez regarding TI reimbursement for Windward Oaks (.2); work session with H. Valentine regarding collection of certified sale orders and delivery of same to title (.2); multiple correspondences with A. Jimenez and C. Shah regarding lease payment at Bowie (.3); and correspond with L. Holl Chang regarding requested land record for Windward Oaks (.2).	6.40	3,200.00
06/26/25	MEW	Receipt and review of certified copies of articles and good standing certificates for OME 2001 Mark Center, LLC, OME Windward Oaks, LLC, OME Bowie Corporate Center, LLC, and Aztec OME Holdings, Inc. Email copies to Zack Schneider with notation of action needed to bring OME Bowie Corporate Center, LLC into good standing.	0.50	160.00
06/27/25	ZAS	Closing status call for closing with purchaser and title for Mark Center (0.3). Closing status call for closing with purchaser and title for Bowie Center (0.4). Closing status call for closing with purchaser and title for Windward Oaks (0.4). Status call for closing with Bank of America (0.3). Call with Hines regarding cure payments, July rents, and other closing statement items for the properties (0.5). Correspond with local counsel regarding the revised deeds for Virginia and Maryland and further revise the deeds (0.4). Correspond with title regarding	6.80	3,740.00

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		the revised deeds and title affidavits (0.2). Correspond with Bank of America regarding the execution and delivery of its lien releases (0.2). Correspond with purchaser's counsel regarding the revised Mark Center deed (0.3). Correspond with title regarding the certified sale orders and the delivery of the same (0.1). Correspond with title regarding the standing of OME Bowie Center (1.2). Confer with A. Perez and B. Funk regarding the standing of OME Bowie Center (0.7). Correspond with title and A. Perez regarding the Maryland withholding tax exemption form (0.5). Review revisions to the Windward Oaks legal description and correspond with title regarding the same (0.2). Review the status of outstanding items for closing and prepare for closing (0.9). Review the updated closing statement for Mark Center provided by title (0.2).		
06/27/25	HJV	Meet with court clerk and obtain certified copies of the sale orders for closing (1.0). Emails with B. Funk and A. Perez regarding delivery of sale orders to title (.1). Attention to delivery of sale orders to title (.1). Prepare notice of assumption of contracts (.9). Email to B. Funk regarding same (.1).	2.20	473.00
06/27/25	JDC	Various email communications with purchasers, title company and BANA relating to closing status and progress (.3). Conference with B. Funk and A. Perez regarding closing items and outstanding issues (.2). Conference with Mayor Brown team regarding same (.2). Continued conference with B. Funk and A. Perez regarding closing items, including solutions for good-standing issue and related timing concerns (.3).	1.00	690.00
06/27/25	ARP	Pre-closing phone conference for Mark Center purchaser representatives, title representatives, B. Funk, and Z. Schneider (.2); pre-closing phone conference for Bowie purchaser representatives, title representatives, B. Funk, and Z. Schneider (.3); pre-closing phone conference for Windward Oaks purchaser representatives, title representatives, B. Funk, and Z. Schneider (.3); phone conference with counsel for Bank of America and Debtors' advisors and regarding closing issues and payments (.3); phone conference with C. Shah and Hines team and Debtors' advisors regarding issues related to closings and payments (.4); multiple work sessions with H. Valentine regarding collection and transmittal to title of certified sale orders (.3); multiple correspondences to S. Lang and A. Golenko regarding closing issues and items (1.8); multiple correspondences with T. Kiriakos and J. Kellner regarding issues related to closing (.4); multiple work sessions with Z. Schneider, B. Funk, and J. Cornwell regarding closing issues (1.6); multiple correspondences with A. Simon, M. Millard, and S. Lang regarding survey for Windward Oaks (.3); correspond with H. Valentine and A. Merovitch regarding notice of assignment related to 1031 exchange (.2); and prepare revised schedules of cure amounts for Mark Center and Bowie closing statements (.8).	6.90	3,450.00

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06/27/25	BLF	Prepare for and attend conferences with title company and buyers regarding outstanding items (1.3); conferences with A. Perez and Z. Schneider regarding solutions to potential obstacles to closing (.4); conferences with J. Cornwell regarding same and general status (.3); monitor and respond to correspondence regarding closings (1.1).	3.10	1,860.00
06/28/25	HJV	Revise notice of assumption of contracts.	1.90	408.50
06/28/25	ZAS	Review the draft closing statement for Bowie Center and prepare comments to the same (0.3). Review the draft closing statement for Windward Oaks and prepare comments to the same (0.2). Review the updated closing statement and tax certificate for Mark Center and prepare comments to the closing statement (0.3). Review correspondence with title and purchaser regarding the Mark Center closing statement and tax prorations (0.2).	1.00	550.00
06/29/25	ARP	Multiple correspondences with A. Merovitch and Z. Schneider regarding Bowie closing statement (.4); review draft closing statements (.2); correspond with A. Jimenez regarding July rents (.1); correspond with S. Lang regarding Maryland tax form (.1); and review draft final notice of executory contracts to be assumed and assigned with sales and related correspondence (.2).	1.00	500.00
06/29/25	HJV	Continue work on notice of assumption of contracts.	1.30	279.50
06/29/25	ZAS	Review correspondence regarding the Maryland withholding exemption form (0.1). Review correspondence regarding payment of the cure amounts, tax prorations, and other closing statement charges and credits and correspond with A. Perez regarding the same (0.2).	0.30	165.00
06/30/25	BLF	Monitor and respond to correspondence and conferences with A. Perez and Z. Schneider regarding closings (3.7); revise and transmit Westway assignment document and correspondence with J. Ginley and C. Haddad regarding same (.4).	4.10	2,460.00
06/30/25	JDC	Various meetings with B. Funk and A. Perez regarding closing status and strategy.	0.40	276.00
06/30/25	ZAS	Finalize the Mark Center closing instruction letter and correspond with title regarding the same, correspond with title and purchaser regarding outstanding items for closing, the closing statement, and the fully executed closing documents, multiple conferences with title and purchaser regarding outstanding items for closing, review the fully executed closing documents, and close the sale of the Mark Center property (2.0). Finalize the Windward Oaks closing instruction letter and correspond with title regarding the same, review the tax prorations for Windward Oaks and correspond with Bank of America, purchaser, and title regarding the same, correspond with title and purchaser regarding purchaser's executed closing documents, multiple conferences with title, purchaser, and Bank of America regarding outstanding items for closing, review the fully executed closing documents and close the sale of Windward Oaks (2.5). Multiple conferences	8.70	4,785.00

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		with A. Perez and B. Funk regarding outstanding items for closing (1.0). Finalize the Bowie Center closing instruction letter and correspond with title regarding the same, review the tax prorations for Bowie Maryland and correspond with Bank of America, purchaser, and title regarding the same, correspond with title and purchaser regarding purchaser's executed closing documents, multiple conferences with title, purchaser, seller, and Bank of America regarding outstanding items for closing, review the fully executed closing documents and close the sale of Bowie Center (3.2).		
06/30/25	HJV	Multiple emails to title regarding Fedex delivery of certified copies of sale orders (.3). Revise certificates of exemption for Aztec (.2).	0.50	107.50
06/30/25	ARP	Prepare final notice of assumed and assigned contracts (1.3); multiple conferences with Z. Schneider and B. Funk regarding outstanding items for closings (1.0); multiple correspondences with G. Zarate and C. Haddad regarding form and information needed for Bowie closing (1.1); multiple work sessions with H. Valentine regarding delivery of documents to title (.3); phone conference with A. Merovitch regarding issues related to Bowie closing (.1); monitor and attend to numerous correspondences with S. Lang, A. Merovitch, T. Kiriakos, and Z. Schneider regarding provision of final items and authorizations for closings of Mark Center, Bowie, and Windward Oaks (4.7); and multiple correspondences with A. Simon regarding follow up items related to Windward Oaks closing (.2).	8.70	4,350.00
Total for 08			261.90	129,839.50

Task Code: 11 Plan and Disclosure Statement

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/02/25	ARP	Correspond with C. Cu regarding balloting update.	0.10	50.00
06/04/25	HJV	Prepare witness and exhibit list (.2). Prepare Agenda for 6/12 hearing (.5).	0.70	150.50
06/04/25	BLF	Draft, review, and revise confirmation order and consider filing brief in support.	1.10	660.00
06/05/25	ARP	Work session with H. Valentine regarding preparation of notice of remote testimony for confirmation and sale hearing (.4).	0.40	200.00
06/05/25	JDC	Conference with B. Funk and A. Perez regarding sale and confirmation hearing preparations.	0.30	207.00
06/05/25	HJV	Confer with A. Perez regarding notice of intent to adduce remote testimony (.3). Revise same and finalize for filing (.3).	0.60	129.00

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06/06/25	BLF	Prepare for and attend team conference on confirmation preparations (.5); correspondence with J. Baumgartner regarding confirmation and post-effective date matters (.1); conference with J. Rudd regarding Westway and confirmation matters (.1); prepare for and attend conference with J. Baumgartner and A. Perez regarding confirmation and post-confirmation planning and budget (.4).	1.10	660.00
06/06/25	HJV	Working session with B. Funk and A. Perez regarding strategy and timeline of filings and next steps in advance of the confirmation hearing (.5). Update calendar regarding deadlines and timeline regarding same (.3). Confer with B. Funk regarding Haddad declaration (.1).	0.90	193.50
06/06/25	ARP	Case strategy conference with B. Funk and H. Valentine regarding tasks and open items related to sales processes and preparation for confirmation and sales hearing.	0.70	350.00
06/08/25	JDC	Conference with B. Funk and A. Perez regarding status and final preparations for confirmation and sale hearings.	0.50	345.00
06/08/25	ARP	Correspond with C. Cu regarding declaration on solicitation and voting tabulation.	0.10	50.00
06/08/25	BLF	Draft, review and revise confirmation order and related documents (2.2); conference with J. Cornwell and A. Perez regarding status of preparations for confirmation and follow-up correspondence regarding same (.4).	2.60	1,560.00
06/08/25	ARP	Case strategy phone conference with J. Cornwell and B. Funk regarding sales process and hearing preparation updates.	0.40	200.00
06/09/25	ARP	Multiple rounds of preparation of revisions to declaration of C. Cu (1.2); multiple correspondences with B. Funk and C. Cu regarding proposed revisions to declaration of C. Cu (.3); and phone conference with C. Cu regarding revised declaration (.1).	1.60	800.00
06/09/25	JDC	Various email communications with team regarding Stretto declaration and voting report (.1). Analysis of revised Stretto declaration (.1). Conference with team regarding confirmation hearing strategy (.2).	0.40	276.00
06/09/25	BLF	Review and revise confirmation order and related documents (4.8); conference with MHKH team regarding status of confirmation planning (.2).	5.00	3,000.00
06/10/25	JDC	Review of witness and exhibit list (.1). Review Stretto declaration prior to filing (.1). Review draft confirmation order from B. Funk (.3). Related email communications with Mayer Brown team (.1). Review of and revisions to draft Haddad declaration (.2). Review of and revisions to draft Baumgartner declaration (.4). Related coordination with B. Funk (.2).	1.40	966.00
06/10/25	HJV	Finalize and file Stretto Declaration (.1). Finalize Mark Center sale order, PSA, notice of filing (.7). Prepare redline of Mark Center sale orders (.1). Conference with team regarding filings (.2).	1.10	236.50

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06/10/25	BLF	Review and revise confirmation order and final review of plan for any required changes in advance of confirmation hearing (1.9); prepare, review and revise declarations of J. Baumgartner and C. Haddad (4.7); prepare, review and revise witness and exhibit list and other confirmation related filings (.6); consider and draft language for orders related to assumption of contracts (.5).	7.90	4,740.00
06/11/25	JDC	Analysis of final revisions to confirmation order from Mayer Brown team (.1). Related coordination with B. Funk (.2). Final review of confirmation order and filing of same (.3). Coordination with B. Funk and A. Perez regarding confirmation and sale hearing presentation, respective participation by team, and related strategy (.2).	0.80	552.00
06/11/25	BLF	Correspondence with T. Kiriakos and Mayer Brown team regarding effective date cash available for distribution to BANA (.1); follow-up correspondence with J. Baumgartner regarding same (.1); prepare, review, revise, and coordinate filing of confirmation materials (3.6); prepare for confirmation hearing (.8).	4.60	2,760.00
06/12/25	JDC	Final preparations for confirmation and sale hearings, including compilation and review of materials and coordination with MHKH team (.6). Attendance of confirmation and sale hearings (.9). Post-hearing communications with Charles Haddad (.2).	1.70	1,173.00
06/12/25	BLF	Prepare for and attend plan confirmation hearing.	2.80	1,680.00
06/16/25	ARP	Case strategy conference with J. Cornwell, B. Funk, and H. Valentine regarding follow up tasks and issues regarding sales and other items in advance of plan effective date (.5); work session with H. Valentine regarding collection of signature on 9019 settlement agreement and related issues (.1); and correspond with J. Gibbs regarding entry of order approving 9019 settlement (.1).	0.70	350.00
06/16/25	HJV	Working team meeting with B. Funk, J. Cornwell, and A. Perez regarding upcoming closings, winddown budget, final fee application, and go forward winddown strategy (.5). Confer with A. Perez regarding same (.1). Gather orders for sending to Charles Haddad for tax purposes (.1).	0.70	150.50
06/16/25	BLF	Consider reserves and other potential hold backs and prepare estimate of recoveries on effective date for BANA.	0.50	300.00
06/19/25	BLF	Prepare detailed correspondence to client team regarding effects of confirmation and sales, and next steps for on and after effective date.	1.10	660.00
06/19/25	JDC	Email communication with client team attaching entered confirmation and sale orders.	0.10	69.00
06/25/25	BLF	Team meeting for effective date items.	0.50	300.00
06/26/25	BLF	Conference with J. Baumgartner regarding post-effective date management (.4).	0.40	240.00

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06/27/25	BLF	Research regarding forms of motions and notices needed for effective date and post-effective date management of cases (1.1); draft same (.2).	1.30	780.00
06/30/25	BLF	Correspondence with J. Baumgartner and B. Kim regarding case settlement statement and reserves (.1); prepare for and attend conferences with J. Baumgartner and P. Hodson regarding final taxes and post-effective date reserves (1); review and revise motion to close cases and notice of effective date (.5); review and respond to correspondence with company counsel regarding next steps following effective date (.2).	1.80	1,080.00
Total for 11			43.90	24,868.00

Task Code: 14 Reporting/MORs

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/02/25	ARP	Correspond with J. Baumgartner and B. Kim regarding April MORs.	0.10	50.00
06/09/25	ARP	Review draft monthly operating reports (.5); and correspond with J. Baumgartner regarding draft reports (.1).	0.60	300.00
06/10/25	HJV	Finalize for filing April monthly operating reports for all debtor entities.	1.00	215.00
Total for 14			1.70	565.00
Total			318.50	\$159,036.00

Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	John D. Cornwell	JDC	690.00	36.20	24,978.00
Shareholder	Alexander R. Perez	ARP	500.00	121.30	60,650.00
Shareholder	Brenda L. Funk	BLF	600.00	63.00	37,800.00
Shareholder	Zachary (Zack) A. Schneider	ZAS	550.00	42.80	23,540.00
Associate	Georgina E. (Georgie) Tomalty	GET	360.00	0.80	288.00
Paralegal	Heather J. Valentine	HJV	215.00	53.60	11,524.00
Paralegal	Margaret E. Wingert	MEW	320.00	0.80	256.00
Total				318.50	\$159,036.00

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Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/27/25	FedEx - Federal Express Tracking ID 882358820352 Shipped By Heather Valentine, MUNSCH HARDT KOPF & HARR PC, 700 Milam Street, Suite 800, HOUSTON, TX 77002 to Serena P Lang, chicago title insurance company, 711 third avenue 8th floor, , NEW YORK, NY 10017	79.69
06/27/25	Heather J. Valentine - Certified Copy Charges: H Valentine; US District Court Houston: Certified Copies of Sale Orders for Bowie, Mark Center, and WWO.	107.60
06/25/25	FedEx - Federal Express Tracking ID 882306651315 Shipped By Heather Valentine, MUNSCH HARDT KOPF & HARR PC, 700 Milam Street, Suite 800, HOUSTON, TX 77002 to Serena P Lang, chicago title insurance company, 711 third avenue 8th floor, , NEW YORK, NY 10017	76.12
06/25/25	Capitol Services, LLC - Certified Copy - AZTEC OME HOLDINGS, INC. (DE); OME BOWIE CORPORATE CENTER, LLC (MD); OME WINDWARD OAKS, LLC (GA); OME 2001 MARK CENTER, LLC (VA)	785.28
06/24/25	FedEx - Federal Express Tracking ID 882243414306 Shipped By Heather Valentine, MUNSCH HARDT KOPF & HARR PC, 700 Milam Street, Suite 800, HOUSTON, TX 77002 to HEATHER VALENTINE, MUNSCH HARDT KOPF & HARR PC, 700 MILAM ST STE 800, , HOUSTON, TX 77002	74.71
06/24/25	FedEx - Federal Express Tracking ID 882242370580 Shipped By Heather Valentine, MUNSCH HARDT KOPF & HARR PC, 700 Milam Street, Suite 800, HOUSTON, TX 77002 to Serena P Lang, chicago title insurance company, 711 third avenue 8th floor, , NEW YORK, NY 10017	97.73
06/23/25	FedEx - Federal Express Tracking ID 882245075137 Shipped By Heather Valentine, MUNSCH HARDT KOPF & HARR PC, 700 Milam Street, Suite 800, HOUSTON, TX 77002 to CHARLES HADDAD, , 2752 W HIGH MOUNTAIN RD, UNIT 405, PARK CITY, UT 84098	101.88
06/18/25	Veritext - Deposition - Transcript of Bowie Corporate Center Auction deposition taken 06/05/25	969.70
06/18/25	Veritext - Deposition - Transcript of Mark Center Auction deposition taken 06/05/25	863.70
06/18/25	Veritext - Deposition - Transcript of auction deposition taken 06/06/25	710.00
06/01/25	1.95 GB Active for June - Data Hosting Service (CS Disco)	39.04
Total		\$3,905.45

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Cost Summary

<u>Description</u>	<u>Amount</u>
Data Hosting Service	39.04
Federal Express	430.13
Certified Copy	892.88
Deposition	2,543.40
Total	\$3,905.45

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	Case Administration/Noticing	1.40	443.50
02	General Bankruptcy Advice/Opinions	1.60	600.50
05	Cash Collateral and Postpetition Financing	0.40	240.00
07	Employment and Fee Applications	7.60	2,479.50
08	Asset Disposition	261.90	129,839.50
11	Plan and Disclosure Statement	43.90	24,868.00
14	Reporting/MORs	1.70	565.00
Total		318.50	\$159,036.00

Outstanding Invoices

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Total Balance</u>
06/19/25	10560466	43,706.04	0.00	43,706.04
Total				\$43,706.04



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c/o The Aztec Funds
Attn: Charles Haddad
Paseo de los Tamraindos 90. Torre 2 – Piso 27
Bosque de las Lomas, CDMX 05120

MX - MEXICO

Invoice Date: July 10, 2025
Invoice Number: 10562181
Matter Number: 021990.00002

*For Professional Services through **June 30, 2025***

Client: The Aztec Fund Holding, Inc.
Matter: Chapter 11 Bankruptcy Cases

Total Fees	\$	159,036.00
Total Costs	\$	<u>3,905.45</u>
TOTAL THIS INVOICE	\$	162,941.45
Previous Balance	\$	<u>43,706.04</u>
Total Balance Due	\$	206,647.49

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

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

In re:	§	Chapter 11
	§	
THE AZTEC FUND HOLDING, INC., <i>et al.</i> , ¹	§	Case No. 24-90436 (CML)
	§	
Post-Effective Date Debtors.	§	(Jointly Administered)
	§	

**ORDER ALLOWING FINAL COMPENSATION
AND REIMBURSEMENT OF EXPENSES**

The Court has considered the *Final Fee Application of Munsch Hardt Kopf & Harr, P.C., as Counsel for the Debtors, for the Interim Fee Period from August 5, 2024 through and including June 30, 2025*, filed by Munsch Hardt Kopf & Harr, P.C. (the “Applicant”). The Court orders:

1. The Applicant is allowed compensation and reimbursement of expenses on a final basis in the amount of \$1,818,572.74 for the period set forth in the application.
2. The Debtors are authorized to disburse any unpaid amounts allowed by paragraph 1 of this Order less amounts previously paid to, or held by, Applicant.

Signed _____, 2025.

HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

¹ The Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, if any, are: The Aztec Fund Holding, Inc. (7839); Aztec OME Holdings, Inc. (1731); OME 2001 Mark Center, LLC (9459); OME Bowie Corporate Center, LLC (2184); OME Lake Vista III & IV, LLC (4040); OME Windward Oaks, LLC (5261); TAF 5775 DTC, LLC (2526); TAF Intellicenter, LLC (0832); TAF Lakeside II, LLC (0253); TAF Pinnacle Park, LLC (3055); TAF Pinnacle Park Land, LLC (4591); and TAF Royal Tech, LLC (6049). The Post-Effective Date Debtors’ service address is: Paseo de los Tamarindos 90, Torre 2 - Piso 27, Bosque de las Lomas, CDMX 05120.