

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:

CASE NO. 20-30608

ALDRICH PUMP LLC, *et al.*,¹

CHAPTER 11

Debtors.

Jointly Administered

**SUMMARY OF FOURTEENTH INTERIM APPLICATION FOR COMPENSATION OF
GRIER WRIGHT MARTINEZ, PA FOR SERVICES RENDERED TO AND FOR
REIMBURSEMENT OF EXPENSES AS COUNSEL TO
JOSEPH W. GRIER, III, THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

Name of Applicant:	Grier Wright Martinez, PA
Authorized to Provide Professional Services to:	Joseph W. Grier, III, the Future Claimants' Representative
Date of Appointment:	October 14, 2020
Period for which compensation and reimbursement is sought:	October 1, 2024 through January 31, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$13,496.50
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$25.50
Total amount of compensation and expense reimbursement sought as actual, reasonable and necessary:	\$13,522.00

This is a(n) x interim final application.

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.



**UNITED STATES BANKRUPTCY COURT
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**FOURTEENTH INTERIM APPLICATION FOR COMPENSATION OF GRIER
WRIGHT MARTINEZ, PA FOR SERVICES RENDERED TO AND FOR
REIMBURSEMENT OF EXPENSES AS COUNSEL TO JOSEPH W. GRIER, III,
THE FUTURE CLAIMANTS' REPRESENTATIVE,
FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

Grier Wright Martinez, PA (“GWM”), counsel to Joseph W. Grier, III, the Future Claimants’ Representative in this case (the “FCR”), through counsel, hereby brings its fourteenth interim application for allowance of compensation of \$13,496.50 and reimbursement of expenses of \$25.50 for the period of October 1, 2024 through January 31, 2025 (the “Compensation Period”) in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Doc. No. 171) (the “Fee Procedure Order”), and in support, respectfully represents as follows:

BACKGROUND

1. On June 18, 2020 (the “Petition Date”), the Debtors commenced their bankruptcy cases (together, the “Chapter 11 Case”) by filing a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code. On June 25, 2020, the Court entered an Order directing that the Debtors’ cases be jointly administered (Doc. No. 114). The Debtors are authorized to continue to

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manage their property and operate their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On July 7, 2020, the Court entered its *Order Appointing the Official Committee of Asbestos Personal Injury Claimants* (Doc. No. 147), appointing a committee (the “ACC”) to represent personal injury claimants in this case.

3. On October 14, 2020, the Court entered its *Order Appointing Joseph W. Grier, III as Legal Representative for Future Asbestos Claimants* (Doc. No. 389), appointing the FCR. On October 15, 2020, the Court entered Orders authorizing the FCR to retain Orrick, Herrington & Sutcliffe, LLP (“Orrick”) and Grier Wright Martinez, PA (“GWM”) to represent him in this case. (Doc. Nos. 393 & 394).

4. Pursuant to the Fee Procedure Order, professionals may request monthly compensation and reimbursement. Such requests are to be served on certain identified interested parties for review. If no objection to a professional’s request is received within fourteen (14) days of such request, the Debtors are authorized to pay 90% of the fees and 100% of the expenses requested. The Fee Procedure Order also requires each retained professional to file, approximately every four months, an application for interim Court approval and allowance pursuant to section 331 of the Bankruptcy Code of 100% of the compensation and reimbursement of expenses for the prior four-month period.

COMPENSATION RECEIVED DURING THE INTERIM PERIOD

5. Pursuant to the Fee Procedure Order, GWM has submitted fee statements to the Debtors for the Interim Period. Copies of the relevant invoices are attached as **Exhibit A**. Summarized below are the requested professional fees and expenses and payments that GWM has received on the same.

Date of Request	Period Covered	Requested Fees	Requested Expenses	Payment Received	Amount Outstanding
11/22/2024	10/1/2024-10/31/2024	\$9,738.00	\$0.00	\$8,764.22	\$973.78
12/20/2024	11/1/2024-11/30/2024	\$2,244.00	\$25.50	\$2,045.11	\$224.39
1/28/2025	12/1/2024-12/31/2024	\$622.00	\$0.00	\$559.80	\$62.20
2/25/2025	1/1/2025-1/31/2025	\$892.50	\$0.00	\$0.00	\$892.50

6. In total, GWM has submitted fee statements during the Interim Period for total fees of \$13,496.50 and total expenses of \$25.50. As of the date of this Application, no party has objected to the fee statements circulated by GWM.

SUMMARY OF SERVICES RENDERED

7. Attached here as **Exhibit A** are GWM's monthly invoices, which provide detailed descriptions of the services performed and the expenses incurred by GWM during the Interim Period. In summary, GWM expended a total of 32.1 hours rendering necessary services in this Chapter 11 proceeding during the Interim Period. GWM's fees total \$13,496.50 for the Interim Period.

8. As attorneys for the FCR, GWM has provided a variety of services in the Debtors' bankruptcy case as set forth in the summary description below and in detail in **Exhibit A**.

9. GWM believes that the services the firm has provided to the FCR in the context of the Debtors' bankruptcy case during the Interim Period were necessary and beneficial to the administration of this case. GWM further believes that its services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the tasks addressed.

10. GWM has attempted to assign time entries for its professionals to the categories that best relate to those services. The following is a summary of the services provided to the FCR during the Interim Period, organized by project billing category:

A. **Case Administration and Business Operations** – 8.4 hours, \$3,915. During the Interim Period, GWM kept the FCR and his professionals abreast of case issues and reviewed and responded to emails from attorneys for the parties.

B. **Professional Retention/Fee Issues** – 2.9 hours, \$1,437. GWM reviewed and signed off on fee requests for the FCR’s professionals, corresponded with Debtors’ counsel regarding fee issues, and prepared a second supplemental declaration regarding involvement in other litigation.

C. **Court Hearings** – 13.9 hours, \$5,461.50. GWM attended a status hearing.

D. **Fee Application Preparation** – 2.2 hours, \$418.00. GWM prepared applications for compensation for the FCR and GWM.

E. **Asbestos Matters** – 4.7 hours, \$2,265. GWM reviewed pleadings and orders filed in other asbestos cases, prepared notices of appearance in other cases, and reviewed and edited an amicus brief in an appeal before the Fourth Circuit.

11. In **Exhibit B**, GWM has categorized the firm’s time by project categories recommended by the Guidelines for Compensation and Expense Reimbursement of Professionals referenced in Rule 2016-1 of this Court’s Local Rules of Practice and Procedure (the “Local Rules”).

12. **Exhibit C** reflects a summary by category of the expenses that GWM incurred during the Interim Period, which totaled \$25.50.

13. **Exhibit D** provides information as to GWM's professionals, including years of practice, billing rates, and the total number of hours billed during the Interim Period. GWM maintains that its billing rates for the Interim Period should be deemed reasonable for purposes of this Court's determination of the "reasonableness" of the fees for the services that GWM has rendered.

14. Attached as **Exhibit E** is a summary of GWM's prior applications for compensation in this case.

DISBURSEMENTS

15. GWM must incur certain expenses in the course of rendering services to the FCR. Those expenses may include items such as court fees, copying charges, regular and express mail charges, special or hand delivery charges, photocopying charges, travel expenses, expenses for working meals, computerized research charges, transcription charges, and the like.

16. GWM requests reimbursement for the firm's actual and necessary expenses incurred during the Interim Period in the amount of \$25.50. A detailed breakdown of such expenses is provided in GWM's invoices included in **Exhibit A**, and those expenses are summarized in **Exhibit C**. GWM's expenses during the Interim Period were necessary and reasonable under the circumstances of this case.

NOTICE

17. Notice of this Application has been provided to: (a) the office of the United States Bankruptcy Administrator for the Western District of North Carolina; (b) counsel for the Debtors; (c) counsel for the Debtors' non-debtor affiliates, Trane Technologies Company LLC and Trane U.S. Inc.; (d) counsel to the ACC; and (e) the other parties on the Service List established by the Case Management Order entered in this case. GWM submits that, given the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

18. GWM has not made a prior request for the relief sought in this Application to this or any other Court.

CONCLUSION

19. Based on the foregoing, GWM makes this Application for allowance of interim compensation for professional services rendered and reimbursement of actual costs and expenses incurred representing the Court-appointed FCR.

WHEREFORE, Grier Wright Martinez, PA respectfully requests that the Court enter an Order:

1) Allowing interim compensation to GWM in the amount of \$13,496.50 as reasonable, actual and necessary for professional services rendered by it on behalf of the FCR during the Interim Period and interim reimbursement of expenses incurred during the Interim Period of \$25.50 as reasonable, actual and necessary;

2) Authorizing and directing the Debtors to pay GWM the amount of \$13,522.00, which is equal to 100% of GWM's requested compensation for the Interim Period and 100% of

GWM's requested expense reimbursement for the Interim Period, less all previous payments made to GWM pursuant to the Fee Procedure Order; and

- 3) Granting such further relief as is just and proper.

This is the 13th of March, 2025.

/s/ A. Cotten Wright
A. Cotten Wright (State Bar No. 28162)
Grier Wright Martinez, PA
521 E Morehead Street, Suite 440
Charlotte, NC 28202
704-332-0207
cwright@grierlaw.com
*Attorneys for Joseph W. Grier, III,
Future Claimants' Representative*

EXHIBIT A



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1274
Date: 11/22/2024
Due On: 12/13/2024

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
10/10/2024	Case Administration and Business Operations: Reviewed draft of status report and made edits; reviewed additional changes to status report by Orrick.	ACW	4.30	\$480.00	\$2,064.00
10/10/2024	Case Administration and Business Operations: Reviewed and responded to multiple emails re: draft of status report. Finalized report and filed same electronically.	ACW	0.50	\$480.00	\$240.00
10/11/2024	Case Administration and Business Operations: Prepared amendment to status report to include electronic signature and filed same.	ACW	0.50	\$480.00	\$240.00
10/14/2024	Professional Retention/Fee Issues: Prepared drafts of second supplemental declarations for the FCR and GWM relative to Halifax Litigation.	ACW	1.00	\$480.00	\$480.00
10/21/2024	Professional Retention/Fee Issues: Edited draft declarations for FCR and GWM re: representation by RCD in an unrelated matter.	ACW	0.30	\$480.00	\$144.00
10/23/2024	Case Administration and Business Operations: Review of matters on for October 24, 2024 hearing.	BDR	0.70	\$300.00	\$210.00

Statement # 1274 - 11/22/2024

10/23/2024	Case Administration and Business Operations: Reviewed status reports filed by the parties in preparation for hearing tomorrow.	ACW	1.90	\$480.00	\$912.00
10/24/2024	Court Hearings: Travel to/from and attend hearing re: status update.	BDR	6.80	\$300.00	\$2,040.00
10/24/2024	Court Hearings: Travel to and attendance at status hearing before Judge James.	ACW	6.80	\$480.00	\$3,264.00
10/28/2024	Asbestos Matters: Reviewed Order entered by District Court in DBMP appeal affirming Judge Whitley's denial of relief from stay; emailed order and comments to FCR's legal team.	ACW	0.30	\$480.00	\$144.00
Quantity Subtotal					23.1

Time Keeper	Quantity	Rate	Total
Benjamin Rhodes	7.5	\$300.00	\$2,250.00
A. Cotten Wright	15.6	\$480.00	\$7,488.00
Quantity Total			23.1
Subtotal			\$9,738.00
Total			\$9,738.00
Payment (12/17/2024)			-\$8,764.22
Balance Owing			\$973.78

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1298	01/20/2025	\$2,269.50	\$2,045.11	\$224.39
1317	02/17/2025	\$622.00	\$559.80	\$62.20
1339	03/17/2025	\$892.50	\$0.00	\$892.50

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1274	12/13/2024	\$9,738.00	\$8,764.22	\$973.78

Statement # 1274 - 11/22/2024

Outstanding Balance	\$2,152.87
Total Amount Outstanding	\$2,152.87

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1298
Date: 12/20/2024
Due On: 01/20/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Services

Date	Notes	Attorney	Quantity	Rate	Total
11/04/2024	Asbestos Matters: Reviewed and responded to emails from D.Carnie re: notices of appearance in Bestwall appeal pending before the Fourth Circuit.	ACW	0.20	\$480.00	\$96.00
11/04/2024	Asbestos Matters: Drafted notice of appearance for J.Guy in Bestwall matter pending before the Fourth Circuit and forwarded same to D.Carnie; reviewed and responded to emails regarding the same.	ACW	0.30	\$480.00	\$144.00
11/04/2024	Asbestos Matters: Prepared service list for J.Guy's notice of appearance in Bestwall appeal pending before the Fourth Circuit.	ACW	1.20	\$480.00	\$576.00
11/06/2024	Asbestos Matters: Reviewed motion for leave to file amicus brief with Fourth Circuit and prepared redline comments for Orrick.	ACW	0.40	\$480.00	\$192.00
11/06/2024	Asbestos Matters: Reviewed drafted amicus brief to be filed with the Fourth Circuit and prepared redline comments for Orrick.	ACW	2.10	\$480.00	\$1,008.00

Statement # 1298 - 12/20/2024

11/13/2024	Fee Application Preparation: Prepare six interim applications for compensation and file the same.	BLF	0.80	\$190.00	\$152.00
11/13/2024	Fee Application Preparation: Draft Notice of Opportunity for Hearing on Applications for Compensation. File the same.	BLF	0.20	\$190.00	\$38.00
11/21/2024	Fee Application Preparation: Draft Monthly Fee Statements. Send to D. Felder.	BLF	0.20	\$190.00	\$38.00
Quantity Subtotal					5.4
Services Subtotal					\$2,244.00

Expenses

Date	Notes	Quantity	Rate	Total
11/25/2024	Online Research - Pacer: Online Research - Pacer	1.00	\$25.50	\$25.50
Expenses Subtotal				\$25.50

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	4.2	\$480.00	\$2,016.00
Brittany L. Franklin	1.2	\$190.00	\$228.00
Quantity Total			5.4
Subtotal			\$2,269.50
Total			\$2,269.50
Payment (01/16/2025)			-\$1,329.32
Payment (01/16/2025)			-\$715.79
Balance Owing			\$224.39

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1274	12/13/2024	\$9,738.00	\$8,764.22	\$973.78
1317	02/17/2025	\$622.00	\$559.80	\$62.20

Statement # 1298 - 12/20/2024

1339	03/17/2025	\$892.50	\$0.00	\$892.50
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Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1298	01/20/2025	\$2,269.50	\$2,045.11	\$224.39
Outstanding Balance				\$2,152.87
Total Amount Outstanding				\$2,152.87

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1317
Date: 01/28/2025
Due On: 02/17/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
12/02/2024	Case Administration and Business Operations: Reviewed email from D.Carnie re: notice of appeal of order denying relief from stay filed on behalf of R.Semian.	ACW	0.10	\$480.00	\$48.00
12/03/2024	Professional Retention/Fee Issues: Reviewed and responded to email from J.Solganik re: Tetra Rho November invoice.	ACW	0.10	\$480.00	\$48.00
12/09/2024	Fee Application Preparation: Draft proposed orders on Applications for Compensation for FCR and professionals. Send to JOE for review.	BLF	0.80	\$190.00	\$152.00
12/09/2024	Case Administration and Business Operations: Reviewed and responded to email from A.Pelton re: notice of Anderson Kill's change of address.	ACW	0.10	\$480.00	\$48.00
12/10/2024	Fee Application Preparation: Edit proposed orders on Applications for Compensation for FCR and professionals. Upload the same.	BLF	0.20	\$190.00	\$38.00
12/10/2024	Professional Retention/Fee Issues: Reviewed email from A.Pelton re: issues with payments on prior invoices.	ACW	0.20	\$480.00	\$96.00
12/11/2024	Professional Retention/Fee Issues: Sent email to	ACW	0.10	\$480.00	\$48.00

Statement # 1317 - 01/28/2025

A.Johnson re: payments due to Anderson Kill.					
12/12/2024	Professional Retention/Fee Issues: Reviewed and responded to email from A.Johnson re: inquiry into payments due to Anderson Kill.	ACW	0.10	\$480.00	\$48.00
12/16/2024	Professional Retention/Fee Issues: Reviewed and responded to email from A.Johnson re: update on debtor's plans to pay amounts due to Anderson Kill.	ACW	0.10	\$480.00	\$48.00
12/20/2024	Case Administration and Business Operations: Reviewed email from D.Carnie re: request to identify related cases pending before the 4th Circuit or Supreme Court & sent response.	ACW	0.10	\$480.00	\$48.00
Quantity Subtotal					1.9

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	0.9	\$480.00	\$432.00
Brittany L. Franklin	1.0	\$190.00	\$190.00
Quantity Total			1.9
Subtotal			\$622.00
Total			\$622.00
Payment (02/14/2025)			-\$195.93
Payment (02/14/2025)			-\$363.87
Balance Owing			\$62.20

Detailed Statement of Account

Other Statements

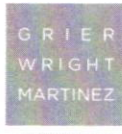
Statement Number	Due On	Amount Due	Payments Received	Balance Due
1274	12/13/2024	\$9,738.00	\$8,764.22	\$973.78
1298	01/20/2025	\$2,269.50	\$2,045.11	\$224.39
1339	03/17/2025	\$892.50	\$0.00	\$892.50

Current Statement

Statement # 1317 - 01/28/2025

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1317	02/17/2025	\$622.00	\$559.80	\$62.20
Outstanding Balance				\$2,152.87
Total Amount Outstanding				\$2,152.87

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255



Grier Wright Martinez, PA

521 E. Morehead St., Suite 440
Charlotte, NC 28202
Phone: (704) 375-3720
www.grierlaw.com

STATEMENT

Statement # 1339
Date: 02/25/2025
Due On: 03/17/2025

Aldrich Pump, LLC

20-10115/Aldrich Pump, LLC

Attorneys for the Future Claimants Representative

Date	Notes	Attorney	Quantity	Rate	Total
01/02/2025	Asbestos Matters: Reviewed email from D.Carnie re: Bestwall appeal brief filed by ACC.	ACW	0.10	\$525.00	\$52.50
01/03/2025	Professional Retention/Fee Issues: Reviewed and responded to A.Pelton re: Anderson Kill November invoice.	ACW	0.10	\$525.00	\$52.50
01/03/2025	Professional Retention/Fee Issues: Reviewed draft fee statement for TetraRho and signed off on same.	ACW	0.10	\$525.00	\$52.50
01/08/2025	Professional Retention/Fee Issues: Reviewed draft fee statement for Orrick and signed off on same.	ACW	0.20	\$525.00	\$105.00
01/10/2025	Asbestos Matters: Reviewed email from D.Carnie re: updates on Red River Talc case.	ACW	0.10	\$525.00	\$52.50
01/16/2025	Professional Retention/Fee Issues: Reviewed email from A.Pelton re: overpayments made to Anderson Kill and sent response.	ACW	0.20	\$525.00	\$105.00
01/22/2025	Professional Retention/Fee Issues: Reviewed draft fee statement for Ankura and signed off on same.	ACW	0.10	\$525.00	\$52.50

Statement # 1339 - 02/25/2025

01/24/2025	Court Hearings: Reviewed email from J.Miller re: proposed communication to chambers relative to January hearing.	ACW	0.10	\$525.00	\$52.50
01/27/2025	Court Hearings: Reviewed email correspondence regarding hearing scheduled for January 30, including email exchange with chambers; requested dial-in instructions for hearing.	ACW	0.20	\$525.00	\$105.00
01/28/2025	Professional Retention/Fee Issues: Reviewed and edited draft fee requests for FCR and GWM.	ACW	0.30	\$525.00	\$157.50
01/29/2025	Case Administration and Business Operations: Reviewed email from J.Guy re: proposed Section 502(d) order and response from FCR.	ACW	0.20	\$525.00	\$105.00
Quantity Subtotal					1.7

Time Keeper	Quantity	Rate	Total
A. Cotten Wright	1.7	\$525.00	\$892.50
Quantity Total			1.7
Subtotal			\$892.50
Total			\$892.50

Detailed Statement of Account

Other Statements

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1274	12/13/2024	\$9,738.00	\$8,764.22	\$973.78
1298	01/20/2025	\$2,269.50	\$2,045.11	\$224.39
1317	02/17/2025	\$622.00	\$559.80	\$62.20

Current Statement

Statement Number	Due On	Amount Due	Payments Received	Balance Due
1339	03/17/2025	\$892.50	\$0.00	\$892.50
Outstanding Balance				\$2,152.87
Total Amount Outstanding				\$2,152.87

Statement # 1339 - 02/25/2025

Please make all amounts payable to: Grier Wright Martinez, PA
Our tax ID is 56-1643255

EXHIBIT B

CUMULATIVE COMPENSATION SUMMARY BY PROJECT CATEGORY

October 1, 2024 through January 31, 2025

Project Category	Total Hours for the Period	Total Hours from the Petition Date	Total Fees for the Period	Total Fees from the Petition Date
Case Administration & Business Operations	8.4	62.2	\$3,915.00	\$24,852.00
Court Hearings	13.9	75.5	\$5,461.50	\$30,580.50
Professional Retention / Fee Issues	2.9	25.65	\$1,437.00	\$10,723.25
Fee Application Preparation	2.2	93.3	\$418.00	\$14,154.00
Asbestos Matters	4.7	37.9	\$2,265.00	\$15,945.00
Litigation	0.0	67.5	\$0.00	\$29,377.50
Plan & Disclosure Statement	0.0	0.20	\$0.00	\$80.00
Total	32.1	362.25	\$13,496.50	\$125,712.25

EXHIBIT C

CUMULATIVE EXPENSE SUMMARY

Expense Category	Total Expenses for the Interim Period	Total Expenses from the Petition Date
Court Fee – <i>Pro Hac Vice</i> Applications	\$0.00	\$2,331.00
Westlaw – Online Research	\$0.00	\$268.46
Pacer – Online Research	\$25.50	\$516.44
TOTAL	\$25.50	\$3,115.90

EXHIBIT D

SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name of Professional	Position – Bar Year	Hourly Billing Rate	Total Hours Billed	Total Compensation
A. Cotten Wright	Member- 2001	\$480	20.7	\$9,936.00
A. Cotten Wright	Member- 2001	\$525	1.7	\$892.50
Benjamin Rhodes	Associate - 2024	\$300	7.5	\$2,250.00
Brittany L. Franklin	Paralegal	\$190	2.2	\$418.00
Summer Clerk	Summer Clerk	\$175	0.0	\$0.00

EXHIBIT E

SUMMARY OF PRIOR FEE APPLICATIONS

Document	Interim Fee Application Date and Doc. No.	Period Covered	Fees Requested/Allowed	Expenses Requested/Allowed	Order Approving Interim Application
1 st Interim	11/9/2020 Doc. No. 421	9/23/2020 – 9/30/2020	\$1,960.00	\$281.00	Doc. No. 460 12/3/2020
2 nd Interim	3/11/2021 Doc. No. 615	October 1, 2020 – January 31, 2021	\$21,926.25	\$355.00	Doc. No. 660 4/2/2021
3 rd Interim	7/9/2021 Doc. No. 763	February 1, 2021- May 31, 2021	\$17,825.00	\$915.78	Doc. No. 794 8/2/2021
4 th Interim	10/29/2021 Doc. No. 862	June 1, 2021 – September 30, 2021	\$14,200.00	\$96.32	Doc No. 927 12/8/2021
5 th Interim	03/01/2022 Doc. No. 1007	October 1, 2021 – January 31, 2022	\$6,542.50	\$44.00	Doc. No. 1064 03/23/2022
6 th Interim	07/11/2022 Doc. No. 1263	February 1, 2022- May 31, 2022	\$4,335.00	\$31.90	Doc. No. 1314 08/03/2022
7 th Interim	11/7/2022 Doc. No. 1389	June 1, 2022- September 30, 2022	\$4,797.50	\$37.30	Doc. No. 1456 12/7/2022
8 th Interim	3/8/2023 Doc. No. 1630	October 1, 2022 – January 31, 2023	\$4,017.50	\$8.70	Doc. No. 1826 6/21/2023
9 th Interim	7/12/23 Doc. No 1866	February 1, 2023 – May 31, 2023	\$5,915.00	\$309.30	Doc. No. 1904 8/2/2023

10 th Interim	11/7/2023 Doc. No. 1989	June 1, 2023 – September 30, 2023	\$10,110.00	\$29.10	Doc. No. 2025 11/30/2023
11 th Interim	3/15/2024 Doc. No. 2149	October 1, 2023 – January 31, 2024	\$6,438.00	\$39.00	Doc. No. 2195 04/11/2024
12 th Interim	7/11/2024 Doc. No. 2299	February 1, 2024- May 31, 2024	\$9,135.00	\$612.00	Doc. No. 2338 8/2/2024
13 th Interim	11/13/2024 Doc. No. 2441	June 1, 2024- September 30, 2024	\$5,014.00	\$612.20	Doc. No. 2480 12/12/2024