

**IN THE UNITED STATES BANKRUPTCY  
COURT FOR THE DISTRICT OF NEW JERSEY  
ATTORNEY MONTHLY FEE STATEMENT COVER  
SHEET FOR THE PERIOD JULY 1, 2025 THROUGH JULY 31, 2025**

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CBRM Realty Inc., *et al.*<sup>1</sup>

Applicant: White & Case LLP

Case No. 25-15343 (MBK)

Client: Debtors and Debtors in Possession

Chapter 11

Case Filed: May 19, 2025

**COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION  
UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746.**

**RETENTION ORDER ATTACHED.**

/s/ Gregory F. Pesce

Gregory F. Pesce

Partner, White & Case LLP

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: CBRM Realty Inc. (2420), Crown Capital Holdings LLC (1411), Kelly Hamilton Apts LLC (9071), Kelly Hamilton Apts MM LLC (0765), RH Chenault Creek LLC (8987), RH Copper Creek LLC (0874), RH Lakewind East LLC (6963), RH Windrun LLC (0122), RH New Orleans Holdings LLC (7528), RH New Orleans Holdings MM LLC (1951), and Laguna Reserve Apts Investor LLC (N/A). The location of the Debtors' service address in these chapter 11 cases is: In re CBRM Realty Inc., et al., c/o White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020.



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<p style="text-align: center;"><b>SECTION I</b> <b><u>FEE SUMMARY</u></b></p>
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Summary of Amounts Requested for the Period  
July 1, 2025 through July 31, 2025 (the “**Compensation Period**”)

Fee Total	\$1,290,576.00
Disbursement Totals	\$11,383.65
Total Fees Plus Disbursements	\$1,301,959.65

Summary of Amounts Requested for Previous Records

Total Previous Fees and Expenses Requested	\$2,340,015.79
Total Fees and Expenses Allowed to Date	\$0.00
Total Retainer Remaining	\$0.00
Total Holdback	\$463,755.60
Total Received by Applicant	\$1,876,260.19

Name	Title	Department	Year Admitted	Hours	Rate	Fees
Aquije, Alonso	Associate	Financial Restructuring & Insolvency (FRI) Practice	2022	137.8	\$1,110.00	\$152,958.00
Baccash, Laura	Partner	Financial Restructuring & Insolvency (FRI) Practice	2003	71.6	\$1,690.00	\$121,004.00
Binuya, Sebastian Angelo	Litigation Specialist	Practice Technology - Disputes	N/A	0.5	\$420.00	\$210.00
Branson, Ariell	Associate	Litigation Practice	2023	7.7	\$1,110.00	\$8,547.00
Campbell, Claire	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	1.7	\$1,280.00	\$2,176.00
Chemborisov, Gleb	Litigation Specialist	Timekeeper Pool	N/A	0.5	\$490.00	\$245.00
Chen, Tony	Manager of Litigation Support	Timekeeper Pool	N/A	0.8	\$490.00	\$392.00
Curtis, Lucas	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	73.3	\$1,280.00	\$93,824.00
Delgado, Gabriela	Associate	Financial Restructuring & Insolvency (FRI) Practice	2023	46.6	\$990.00	\$46,134.00
Fryman, Scott	Partner	Tax Practice	2015	5.5	\$1,790.00	\$9,845.00
Gaertner, Reilly	Associate	Real Estate Practice	2016	4.1	\$1,520.00	\$6,232.00
Giovine, Peter	Associate	Financial Restructuring & Insolvency (FRI) Practice	2023	20.9	\$990.00	\$20,691.00
		Litigation Practice		89.4	\$990.00	\$88,506.00
Greene, Rick	Research Professional	Research	N/A	0.6	\$605.00	\$363.00
He, Fan	Counsel	Financial Restructuring & Insolvency (FRI) Practice	2007	23.1	\$1,630.00	\$37,653.00
Hershey, Samuel	Partner	Financial Restructuring & Insolvency (FRI) Practice	2013	11.9	\$1,790.00	\$21,301.00
Hirshorn, Deanna	Legal Assistant	Financial Restructuring & Insolvency (FRI) Practice	N/A	36.2	\$490.00	\$17,738.00
Kava, Sam	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	130.3	\$1,280.00	\$166,784.00
Lingle, Barrett	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	162.3	\$1,370.00	\$222,351.00
Mitra, Anais	Associate	Financial Restructuring & Insolvency (FRI) Practice	2022	11.3	\$1,110.00	\$12,543.00
Pena, Mariana	Legal Assistant	Litigation Practice	N/A	0.5	\$490.00	\$245.00
Pepin, Nadine	Associate	Real Estate Practice	2016	12.6	\$1,280.00	\$16,128.00
Pesce, Gregory	Partner	Financial Restructuring & Insolvency (FRI) Practice	2011	46.0	\$2,100.00	\$96,600.00
Pezza, David	Partner	Real Estate Practice	1985	11.6	\$2,100.00	\$24,360.00
Rivero, Devin	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	63.1	\$1,280.00	\$80,768.00
Sutherland, Gabe	Associate	Financial Restructuring & Insolvency (FRI) Practice	2023	17.9	\$1,110.00	\$19,869.00
Venes, Aileen	Legal Assistant	Financial Restructuring & Insolvency (FRI) Practice	N/A	6.8	\$490.00	\$3,332.00
Wick, Katie	Legal Assistant	Financial Restructuring & Insolvency (FRI) Practice	N/A	0.1	\$490.00	\$49.00
Yoo, Jade	Associate	Financial Restructuring & Insolvency (FRI) Practice	2020	14.4	\$1,370.00	\$19,728.00
Grand Total				1009.1		\$1,290,576.00

**SECTION II**  
**SUMMARY OF SERVICES**

<b>Matter Number</b>	<b>Services Rendered</b>	<b>Hours</b>	<b>Fees</b>
<b>B01</b>	Asset Sales: Kelly Hamilton	168.1	\$230,637.74
<b>B02</b>	Automatic Stay Issues	7.7	\$8,547.00
<b>B04</b>	Vendors, Taxes, Insurance and Business Operations Issues	10.3	\$12,585.00
<b>B05</b>	Case Administration	31.0	\$28,360.00
<b>B06</b>	Case Strategy	6.3	\$7,775.00
<b>B07</b>	Claims Administration & Objections	14.9	\$17,814.00
<b>B08</b>	Financing Matters: NOLA	51.3	\$68,678.00
<b>B09</b>	Financing Matters: Kelly Hamilton	3.4	\$4,597.00
<b>B10</b>	Creditor Meetings & Statutory Committees	0.8	\$1,095.00
<b>B11</b>	Exclusivity, Plan & Disclosure Statement: Kelly Hamilton	225.3	\$317,813.00
<b>B12</b>	Executory Contracts & Unexpired Leases	3.8	\$1,862.00
<b>B13</b>	Hearings & Court Matters	9.8	\$13,807.00
<b>B16</b>	Professional Retention & Fees – W&C	22.8	\$31,300.00
<b>B17</b>	Professional Retention & Fees – Other	107.0	\$129,923.00
<b>B18</b>	Reports, Schedules & U.S. Trustee Issues	17.6	\$20,164.00
<b>B19</b>	Development of Claims and Causes of Action	267.3	\$311,189.00
<b>B20</b>	Asset Sales: NOLA	60.8	\$83,250.26
<b>B21</b>	Exclusivity, Plan & Disclosure Statement: NOLA	0.9	\$1,179.00
<b>Grand Total</b>		<b>1,009.1</b>	<b>\$1,290,576.00</b>

**SECTION III**  
**SUMMARY OF DISBURSEMENTS**

<b>Disbursements</b>	<b>Amount</b>
Airfare	\$1,194.26
Computer Services	\$30.95
Conference Room Dining	\$81.38
Court Costs	\$14.99
Deposition Transcripts	\$153.30
Document Research	\$92.94
E-Discovery Data Hosting / Storage	\$6.50
E-Discovery Data Processing	\$35.00
E-Discovery Production	\$130.00
Express Mail	\$63.82
Filing Fees	\$384.00
Hotel Expense	\$1,299.37
Local Travel	\$596.00
Outside Legal Services	\$3,237.50
Overtime Meals	\$34.62
Taxi - Business	\$3,479.38
Taxi - Overtime	\$312.64
UCC Filing Fees	\$237.00
<b>Grand Total</b>	<b>\$11,383.65</b>

<p style="text-align: center;"><b>SECTION IV</b> <b><u>CASE HISTORY</u></b></p>
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- (1) Date cases filed: May 19, 2025
- (2) Chapter under which case commenced: Chapter 11
- (3) Date of retention: June 27, 2025 effective as of May 19, 2025. *See **Exhibit A**.*

If limit on number of hours or other limitations to retention, set forth: N/A

- (4) Summarize in brief the benefits to the estate and attach supplements as needed:<sup>1</sup>
  - (a) The Applicant moved forward with an asset sale in connection with Kelly Hamilton Property, including preparing, filing and prosecuting a bid procedures motion [Docket No. 281], negotiating revisions to the proposed order approving same [Docket No. 325], and negotiating and drafting an asset purchase agreement and ancillary documents in connection with the sale.
  - (b) Following entry of the order approving the NOLA postpetition financing [Docket No. 251], the Applicant moved forward with the closing of the postpetition financing transaction.
  - (c) The Applicant reviewed, revised, and negotiated successive iterations of the Debtors' disclosure statement and chapter 11 plan; drafted, filed, and prosecuted a motion requesting approval of the disclosure statement [Docket No. 283]; and revised and negotiated ancillary documents to the plan, including the related asset purchase agreement. The Applicant engaged with stakeholders regarding their formal and informal objections and concerns with respect to the disclosure statement and plan.
  - (d) The Applicant assisted the Debtors in moving forward with the retention applications for its other professionals, including IslandDundon, Larry G. Schedler & Associates, and Hilco, and an ordinary course professionals motion.
  - (e) The Applicant assisted the Debtors in developing claims and causes of action to the benefit of the estate, including preparing and filing the complaint in the adversary proceeding [Case No. 25-01295-MBK] against Spano Investor LLC and Acquiom Agency Services LLC, conducting discovery against Silber, responding to discovery requests directed to the Debtors, addressing automatic stay issues, and analyze other potential claims and causes of action.

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<sup>1</sup> The following summary is intended to highlight the general categories of services the Applicant rendered on behalf of the Debtors and for the benefit of the estates; it is not intended to itemize each and every professional service which the Applicant performed.

- (f) The Applicant moved forward with an asset sale in connection with the NOLA Properties, including preparing a bid procedures motion [later filed at Docket No. 350].
  - (g) The Applicant attended and participated in the hearing held July 24, 2025.
  - (h) The Applicant tended to other matters concerning administration of the chapter 11 cases.
  - (i) The Applicant rendered all other services set forth on the invoices attached hereto as **Exhibit B**.<sup>2</sup>
- (5) Anticipated distribution to creditors:
- (a) Administration expense: Paid in full.
  - (b) Secured creditors: To be paid in accordance with the *Amended Joint Chapter 11 Plan of CBRM Realty Inc. and Certain of its Debtor Affiliates (With Technical Modifications)* [Docket No. 500] and the *Modified Joint Chapter 11 Plan of Crown Capital Holdings LLC and Certain of its Debtor Affiliates* [Docket No. 501] (collectively, the “**Plans**”).
  - (c) Priority creditors: To be paid in accordance with the Plans.
  - (d) General unsecured creditors: To be paid in accordance with the Plans.
- (6) Final disposition of case and percentage of dividend paid to creditors: This is the third monthly fee statement. Distributions to creditors will be made in accordance with the Plans.

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<sup>2</sup> The invoice attached hereto as **Exhibit B** contains detailed descriptions of the services rendered and expenses incurred by the Applicant during the Compensation Period.

**EXHIBIT A**

**Retention Order**





Order Filed on June 27, 2025  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY <b>Caption in Compliance with D.N.J. LBR 9004-1</b>	
<b>WHITE &amp; CASE LLP</b> Gregory F. Pesce (admitted <i>pro hac vice</i> ) 111 South Wacker Drive Chicago, Illinois 60606 Telephone: (312) 881-5400 Email: gregory.pesce@whitecase.com  -and-  Andrew Zatz Barrett Lingle (admitted <i>pro hac vice</i> ) 1221 Avenue of the Americas New York, New York 10020 Telephone: (212) 819-8200 Email: azatz@whitecase.com barrett.lingle@whitecase.com  <i>Proposed Counsel to Debtors and Debtors-in-Possession</i>  <b>KEN ROSEN ADVISORS PC</b> Kenneth A. Rosen 80 Central Park West New York, New York 10023 Telephone: (973) 493-4955 Email: ken@kenrosenadvisors.com  <i>Proposed Co-Counsel to Debtors and Debtors-in-Possession</i>	
In re:	Chapter 11
CBRM REALTY INC., <i>et al.</i>	Case No. 25-15343 (MBK) (Jointly Administered)
Debtors. <sup>1</sup>	

**ORDER AUTHORIZING THE RETENTION  
AND EMPLOYMENT OF WHITE & CASE LLP AS  
DEBTORS' COUNSEL, EFFECTIVE AS OF THE PETITION DATE**

rief set forth on the following pages, numbered 2 through 7, is **ORDERED**.

**DATED: June 27, 2025**

Honorable Michael B. Kaplan  
United States Bankruptcy Judge

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: CBRM Realty Inc. (2420), Crown Capital Holdings LLC (1411), Kelly Hamilton Apts LLC (1115), Kelly Hamilton Apts MM LLC (0765), RH Chenault Creek LLC (8987), RH Copper Creek LLC (0874), RH Lakewind East LLC (6963), RH Windrun LLC (0122), RH New Orleans Holdings LLC (7528), and RH New Orleans Holdings MM LLC (1951). The location of the Debtors' service address in these chapter 11 cases is: In re CBRM Realty Inc., et al., c/o White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020.

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Debtor: CBRM REALTY INC, *et al.*

Case No. 25-15343 (MBK)

Caption of Order: ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF WHITE & CASE LLP AS DEBTORS' COUNSEL, EFFECTIVE AS OF THE PETITION DATE

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Upon the application (the “**Application**”)<sup>1</sup> of White & Case LLP (“**White & Case**”) for entry of an order (this “**Order**”) authorizing the above-captioned debtors and debtors in possession (the “**Debtors**”) to retain and employ White & Case as bankruptcy counsel, effective as of the Petition Date, and in accordance with the terms and conditions set forth in the Engagement Letter, the Application, the Pesce Declaration, and this Order; and the Court having jurisdiction to consider the Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, and the *Standing Order of Reference to the Bankruptcy Court Under Title 11 of the United States District Court for the District of New Jersey*, dated July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.); and the Court having found that consideration of the Application is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that White & Case provided due, sufficient, and proper notice of the Application under the circumstances and in accordance with the Bankruptcy Rules and Local Rules, and it appearing that no other or further notice is required; and the Court having reviewed the Application and the Pesce Declaration, and having heard statements in support of the Application, if any, at a hearing held before the Court (the “**Hearing**”), if any; and the Court having found and determined that White & Case is a “disinterested person” as that term is defined under section 101(14) of the Bankruptcy Code; and the Court having found that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation thereon and good and

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

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Debtor: CBRM REALTY INC, *et al.*

Case No. 25-15343 (MBK)

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sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Application is GRANTED as set forth herein. Any objections or reservations of rights filed in respect of the Application are overruled, with prejudice.

2. The Debtors are authorized to employ and retain White & Case as bankruptcy counsel pursuant to section 327(a) of the Bankruptcy Code, in accordance with the terms and conditions set forth in the Engagement Letter, the Application, the Pesce Declaration, and this Order, effective as of the Petition Date to the extent set forth herein.

3. White & Case is authorized to provide professional services in the manner described in the Engagement Letter, the Application, the Pesce Declaration, and this Order.

4. Any and all compensation to be paid to White & Case for services rendered on the Debtors' behalf shall be fixed by application to this Court in accordance with sections 330 and 331 of the Bankruptcy Code, applicable provisions of the Bankruptcy Rules and Local Rules, any guidelines of this Court, and such procedures as fixed by this Court's orders. White & Case shall also make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in 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 June 11, 2013, both in connection with the Application and any fee applications to be filed by White & Case in the chapter 11 cases.

5. Prior to applying any increase in White & Case's hourly rates beyond the 2025 rates set forth in the Pesce Declaration, White & Case shall file a supplemental affidavit with the Court and provide ten (10) business days' notice to the Debtors, the U.S. Trustee, and any statutory committee, which supplemental affidavit shall be in accordance with section

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Debtor: CBRM REALTY INC, *et al.*

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330(a)(3)(F) of the Bankruptcy Code and state whether the Debtors have consented to such rate increases. All parties in interest retain all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

6. To avoid any duplication of effort and provide services to the Debtors in the most efficient and cost-effective manner, White & Case shall coordinate with the Debtors' other professionals regarding their respective responsibilities in these chapter 11 cases. White & Case shall use its best efforts to avoid duplication of services provided by any of the Debtors' other retained professionals.

7. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, White & Case (i) shall only bill fifty percent (50%) of its professionals' hourly rate for non-working travel; (ii) shall not seek the reimbursement of any fees or costs, including attorney fees and costs, arising from the defense of any objections to any of White & Case's fee applications in these cases; (iii) shall use the billing and expense categories set forth in the U.S. Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"); and (iv) shall provide all monthly fee statements, interim fee applications, and final fee applications in searchable electronic format to the U.S. Trustee.

8. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, White & Case shall seek reimbursement from the Debtors' estates for its engagement-related expenses at the firm's actual cost paid.

9. Notwithstanding anything in the Application, the Pesce Declaration, or Engagement Letter to the contrary, White & Case shall (i) to the extent that White & Case uses

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Debtor: CBRM REALTY INC, *et al.*

Case No. 25-15343 (MBK)

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the services of independent contractors or subcontractors (collectively, the “**Contractors**”) in these cases, pass through the cost of such Contractors at the same rate that White & Case pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the Contractors are subject to the same conflicts checks as required for White & Case; (iv) file with this Court such disclosures required by Bankruptcy Rule 2014; and (v) attach any such Contractor invoices to its monthly fee statements, interim fee applications and/or final fee applications filed in these cases.

10. No agreement or understanding exists between White & Case and any other person, other than as permitted by section 504 of the Bankruptcy Code, to share compensation received for services rendered in connection with these cases, nor shall White & Case share or agree to share compensation received for services rendered in connection with these cases with any other person other than as permitted by section 504 of the Bankruptcy Code.

11. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, the provision in the Engagement Letter that “[s]hould timely payment not be made on any bills, we reserve the right to charge interest at a rate of 9%” shall be null and void during the pendency of these bankruptcy cases.

12. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, the provision in the Engagement Letter that “[p]ayment for this year end invoice shall be payable by the last business day before December 25” shall be null and void during the pendency of these bankruptcy cases.

13. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, the provision in the Engagement Letter that “[t]o the extent permitted under applicable law and rules of professional conduct, you waive any claims related

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Debtor: CBRM REALTY INC, *et al.*  
Case No. 25-15343 (MBK)  
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AS OF THE PETITION DATE

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to the bill after the twenty day period lapses" shall be null and void during the pendency of these bankruptcy cases.

14. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, the provisions in the Engagement Letter that the Debtors waive any conflicts concerning White & Case's representation of parties adverse to the Debtors shall be null and void during the pendency of these bankruptcy cases.

15. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, termination during the pendency of these chapter 11 cases will only be allowed upon entry of an Order by the Court.

16. Notwithstanding anything in the Application, the Pesce Declaration, or the Engagement Letter to the contrary, the Court shall have exclusive jurisdiction over White & Case's engagement during the pendency of these chapter 11 cases.

17. The Debtors, the Independent Fiduciary, and White & Case are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Engagement Letter, the Application, and the Pesce Declaration.

18. Any relief granted to the Debtors pursuant to this Order shall mean the Debtors, acting at the direction of the Independent Fiduciary.

19. Notice of the Application as provided therein is deemed to be good and sufficient notice of such Application.

20. To the extent the Engagement Letter, the Application, or the Pesce Declaration are inconsistent with this Order, the terms of this Order shall govern.

21. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

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Debtor: CBRM REALTY INC, *et al.*

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AS OF THE PETITION DATE

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22. The Court retains jurisdiction with respect to all matters arising from or related  
to the implementation, interpretation, or enforcement of this Order.





**EXHIBIT B**

**Invoice**

Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

For professional services for the period ending 31 July 2025

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
<b>Asset Sales: Kelly Hamilton</b>				
1 July 2025	Review and revise bid procedures motion and related pleadings (2.0); correspondence with A. Aquije re: same (0.1).	L Baccash	2.10	3,549.00
1 July 2025	Review, revise Kelly Hamilton asset purchase agreement (3.4); correspond with L. Baccash re: bid procedures motion (0.5).	B Lingle	3.90	5,343.00
1 July 2025	Correspond with W&C re: bid procedures (0.9); review and revise motion for bid procedures (5.1); review stalking horse agreement re: same (0.3).	D Rivero	6.30	8,064.00
1 July 2025	Revise bidding procedures motion, incorporating comments from D. Rivero (3.5); cite check and definitional review re: same (2.0).	A Aquije	5.50	6,105.00
1 July 2025	Review and revise bidding procedures motion re: summary of material terms.	G Delgado	0.60	594.00
1 July 2025	Review and revise Kelly Hamilton Bidding Procedures Motion for A. Aquije (0.8); confer with A. Aquije re: same (0.1); confer with D. Rivero re: same (0.1).	Hirshorn, Deanna	1.00	490.00
2 July 2025	Review and revise purchase agreement re: Kelly Hamilton Apartments, Pittsburgh.	D Pezza	0.20	420.00
2 July 2025	Review and revise bid procedures motion and related pleadings (2.1) and confer with D. Rivero and B. Lingle re: same (2.1); correspondence re: asset purchase agreement with B. Lingle (0.2).	L Baccash	4.40	7,436.00
2 July 2025	Telephone conference with L. Baccash, D. Rivero re: bidding procedures motion (1.0); review, revise Kelly Hamilton asset purchase agreement (2.3); telephone conference with L. Baccash, D. Rivero re: bidding procedures motion (1.5); telephone conference with G. Pesce, L. Hoffman (Lippes) and J. Lubertazzi (McCarter) re: asset purchase agreement (0.3); further revise asset purchase agreement (0.7); telephone conference with L. Baccash, D. Rivero re: bidding procedures motion (0.5); telephone conference with L. Baccash and D. Rivero re: bidding procedures motion (0.9).	B Lingle	7.20	9,864.00
2 July 2025	Correspond with W&C re: bid procedures (0.5); review and revise motion for bid procedures (2.3), proposed order re: same (2.3) and exhibits re: same (2.3).	D Rivero	7.40	9,472.00
2 July 2025	Revise bidding procedures motion, incorporating comments from D. Rivero (1.0); call with D. Rivero re: same (0.2); further revise motion re: same (3.1).	A Aquije	4.30	4,773.00

Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
3 July 2025	Review and revise bid procedures (0.4); multiple correspondence with A. Aquije, D. Rivero re: same (0.2).	L Baccash	0.60	1,014.00
3 July 2025	Revise broker engagement agreement (0.5); email Lynd re: same (0.1); review broker engagement letter (0.4); email F. He re: same (0.1).	S Kava	1.10	1,408.00
3 July 2025	Correspond with W&C re: bid procedures (0.5); review and revise motion for bid procedures (3.6).	D Rivero	4.10	5,248.00
3 July 2025	Further revise bidding procedures motion, incorporating comments from D. Rivero (3.5); research re: successor liability for plan sales (0.5).	A Aquije	4.00	4,440.00
6 July 2025	Substantive cite check re: bidding procedures motion.	A Aquije	1.30	1,443.00
7 July 2025	Review and revise bid procedures pleadings and prepare for filing same (1.3); call with B. Lingle, Aquije, and D. Rivero re: solicitation and bid procedures timelines (0.4).	L Baccash	1.70	2,873.00
7 July 2025	Correspond with W&C re: bid procedures (0.4); review and revise motion re: bid procedures (0.7), proposed order re: same (0.7) and exhibits re: same (0.7).	D Rivero	2.50	3,200.00
8 July 2025	Review and revise bid procedures motion, order, exhibits for filing (1.5); extensive correspondence with B. Lingle and A. Aquije re: same (0.3); review asset purchase agreement (0.6); call with B. Lingle, A. Aquije, D. Rivero to review and revise asset purchase agreement per comments from stalking horse (1.2).	L Baccash	3.60	6,084.00
8 July 2025	Telephone conference with L. Baccash, A. Aquije re: asset purchase agreement (1.0); review, revise bidding procedures motion (1.5).	B Lingle	2.50	3,425.00
8 July 2025	Correspond with W&C re: bid procedures (0.8); review and revise motion for bid procedures (0.5), proposed order re: same (0.5); and exhibits re: same (0.5); review stalking horse agreement (0.4).	D Rivero	2.70	3,456.00
8 July 2025	Review and revise bidding procedures motion (1.0); call with L. Baccash re: same (0.2); Review asset purchase agreement (0.7); call with L. Baccash, B. Lingle and D. Rivero re: same (1.2).	A Aquije	3.10	3,441.00
9 July 2025	Review revised Kelly Hamilton Apartments sale agreement (2.0) conference with B. Lingle re: same (0.4).	D Pezza	2.40	5,040.00
9 July 2025	Review asset purchase agreement and related pleadings (0.2); correspondence with B. Lingle re: same (0.1); extensive correspondence with B. Lingle and G. Pesce re: revisions to asset purchase agreement (0.5); review and revise asset purchase agreement (0.9).	L Baccash	1.70	2,873.00

Crown Capital Holdings LLC  
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
9 July 2025	Telephone conference with D. Pezza re: asset purchase agreement (0.4); revise asset purchase agreement (2.7); telephone conference with G. Pesce re: same (0.5); revise same with L. Baccash (0.8).	B Lingle	4.40	6,028.00
9 July 2025	Call with J. Walz re: Kelly Hamilton property (0.1); email Lynd team re: same (0.1); review documents re: background to property (0.3).	S Kava	0.50	640.00
9 July 2025	Correspond with W&C re: bid procedures (0.5); review and revise motion for bid procedures (0.6), proposed order re: same (0.6) and exhibits re: same (0.6); review stalking horse agreement (0.3).	D Rivero	2.60	3,328.00
9 July 2025	Revise bidding procedures motion and exhibits (0.8); further revise same, incorporating comments from B. Lingle (0.5).	A Aquije	1.30	1,443.00
9 July 2025	Review and revise bidding procedures motion (0.8); further revise same, incorporating new terms of stalking horse agreement (2.0); further revise same, incorporating comments from D. Rivero (0.4); research re: free and clear sale (2.0).	A Aquije	5.20	5,772.00
10 July 2025	Review revised Kelly Hamilton Apartments sale agreement (0.9); correspondence with purchaser's counsel re: same (0.9); review purchase agreement form with R. Gaertner (0.9).	D Pezza	2.70	5,670.00
10 July 2025	Review and revise bid procedures and related pleadings (0.8); call with bidder re: asset purchase agreement comments (1.2); review and revise asset purchase agreement (1.0); correspondence and calls with B. Lingle re: same (0.2); call with G. Pesce re: same (0.2); calls with D. Rivero re: revisions to bid procedures (0.5).	L Baccash	3.90	6,591.00
10 July 2025	Telephone conference with L. Baccash, D. Rivero and A. Aquije re: asset purchase agreement (0.2); correspond, telephone conference with L. Baccash re: asset purchase agreement (0.5); telephone conference with L. Hoffman (Lippes) and M. Fernandez (McCarter), L. Baccash, D. Pezza re: asset purchase agreement (1.5).	B Lingle	2.20	3,014.00
10 July 2025	Email D. Pezza re: properties (0.2).	S Kava	0.20	256.00
10 July 2025	Correspond with W&C re: bid procedures (0.5); review and revise motion for bid procedures (0.8), proposed order re: same (0.8); and exhibits re: same (0.8); review revisions to stalking horse agreement (0.5).	D Rivero	3.40	4,352.00
10 July 2025	Call with L. Baccash, B. Lingle, and D. Rivero re: bid procedures motion (0.4); further revise same (0.5); follow up call with L. Baccash, B. Lingle and D. Rivero re: same (0.3); further revise same (0.3).	A Aquije	1.50	1,665.00
11 July 2025	Review revised Kelly Hamilton Apartments sale	D Pezza	3.30	6,930.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	agreement (0.8); correspondence with purchaser's counsel re: same (0.8); review of Pennsylvania transfer tax requirements re: same (0.8); finalize agreement for signature (0.9).			
11 July 2025	Review and revise asset purchase agreement (1.2) and related bid procedures per comments from bidder (1.1); calls and correspondence with B. Lingle re: same (0.5); calls and correspondence with D. Rivero and A. Aquije re: same (0.5); extensive correspondence with B. Lingle and others re: revisions to bid procedures and asset purchase agreement (0.5).	L Baccash	3.80	6,422.00
11 July 2025	Review asset purchase agreement (1.9); revise same (3.9); finalize and coordinate execution of same (1.5); finalize bidding procedures motion (0.6); and file same (0.6).	B Lingle	8.50	11,645.00
11 July 2025	Correspond with W&C re: stalking horse agreement and bid procedures (0.9); review, finalize, and revise motion for bid procedures (1.0); proposed order re: same (1.0); and exhibits re: same (1.1); review revisions to stalking horse agreement (0.7).	D Rivero	4.70	6,016.00
11 July 2025	Call with L. Baccash, B. Lingle and D. Rivero re: bidding procedures (0.4); further revise same (2.1); coordinate filing re: same (0.4).	A Aquije	2.90	3,219.00
11 July 2025	Review and finalize Debtors' Bidding Procedures Motion (0.2); file same (0.1); review and finalize application to shorten time re: same (0.1); file same (0.2); coordinate service with Verita of same (0.1).	Hirshorn, Deanna	0.70	343.00
14 July 2025	Conferences with W&C and IslandDundon re: sale process.	G Pesce	0.60	1,260.00
14 July 2025	Correspond with A. Aquije and D. Rivero re: bidding procedures order.	B Lingle	0.50	685.00
14 July 2025	Correspond with W&C re: revised bid procedures order (0.3); review same (0.2).	D Rivero	0.50	640.00
14 July 2025	Draft revised bidding procedures order (0.6); draft notice and exhibits of revised order re: same (0.2).	A Aquije	0.80	888.00
15 July 2025	Conferences with W&C and IslandDundon re: sale process.	G Pesce	0.60	1,260.00
15 July 2025	Correspond with W&C re: declaration in support of stalking horse agreement (0.3); review research on same (0.3); review and revise declaration in support of stalking horse agreement (1.9).	D Rivero	2.50	3,200.00
15 July 2025	Research re: stalking horse agreements and free and clear sales (1.1); research re: precedent declarations in support of bidding procedures (0.5); draft declaration in support of bidding procedures motion (1.8).	A Aquije	3.55	3,945.86

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 July 2025	Review and revise declaration in support of stalking horse agreement and bid procedures.	D Rivero	1.80	2,304.00
17 July 2025	Review and revise declaration re: bid procedures and call with D. Rivero re: same.	L Baccash	0.40	676.00
21 July 2025	Revise special warranty deed (0.5);review contract assignment (0.4);correspondence to M. Fernandez re: same (0.4).	D Pezza	1.30	2,730.00
21 July 2025	Review and revise Dundon declaration re: bid procedures.	S Hershey	0.50	895.00
21 July 2025	Review revised declaration in support of bid procedures and asset purchase agreement (0.4); correspondence with S. Hershey, B. Lingle, A. Aquije re: same (0.2).	L Baccash	0.60	1,014.00
21 July 2025	Review, revise declaration in support of bidding procedures.	B Lingle	0.40	548.00
21 July 2025	Review and revise declaration in support of bid procedures.	D Rivero	1.10	1,408.00
21 July 2025	Review and revise declaration in support of Kelly Hamilton bidding procedures motion, incorporating comments from L. Baccash, S. Hershey, and B. Lingle.	A Aquije	1.98	2,193.88
22 July 2025	Conferences with W&C and IslandDundon re: sale process.	G Pesce	0.60	1,260.00
22 July 2025	Review, revise exhibits to asset purchase agreement.	B Lingle	0.40	548.00
22 July 2025	Correspond with W&C re: bid procedures for Kelly Hamilton property (0.3); correspond with W&C re: service of assumed and assigned contracts re: same (0.3).	D Rivero	0.60	768.00
22 July 2025	Research re: notices of assumption of executory contracts (0.9); correspondence with W&C and IslandDundon re: same (0.5); finalize declaration in support of bidding procedures, incorporating comments from M. Dundon and L. Baccash (0.3).	A Aquije	1.70	1,887.00
23 July 2025	Conferences with W&C and IslandDundon re: sale process.	G Pesce	0.60	1,260.00
23 July 2025	Review, revise Kelly Hamilton bidding procedures order.	B Lingle	2.40	3,288.00
23 July 2025	Review trustee comments to Kelly Hamilton bidding procedures (0.4); revise bidding procedures order re: same (1.2); review schedule for assumption and assignment notice for Kelly Hamilton property (0.5); emails with D Hirshorn re: service of same (0.3); correspond with W&C re: filing proposed order (0.3).	D Rivero	2.70	3,456.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
23 July 2025	Revise Bidding procedures motion (0.4) and exhibits re: same (0.5); further revise same (0.3) and coordinate with trustee re: same (0.3).	A Aquije	1.50	1,665.00
23 July 2025	Review and respond to email from D. Rivero re: assumed contracts list (0.1); redact assumed contracts list (0.3).	Hirshorn, Deanna	0.40	196.00
24 July 2025	Conferences with W&C and IslandDundon re: sale process.	G Pesce	0.60	1,260.00
24 July 2025	Review and revise bid procedures for Kelly Hamilton (0.6); office conference with D. Rivero re: same (0.2).	L Baccash	0.80	1,352.00
24 July 2025	Revise Kelly Hamilton bidding procedures.	B Lingle	1.20	1,644.00
24 July 2025	Review, revise and file bid procedures for Kelly Hamilton property (0.8); correspond with United States Trustee re: comments to same (0.5); revise notice for proposed order (0.3).	D Rivero	1.60	2,048.00
25 July 2025	Call with B. Lingle re: exhibits to asset purchase agreement.	L Baccash	0.20	338.00
25 July 2025	Correspond with W&C team re: exhibits to Kelly Hamilton asset purchase agreement.	B Lingle	0.30	411.00
25 July 2025	Review assumption and assignment notice (0.3); review confirmation and sale notice (0.3); correspond with IslandDundon re: same (0.2).	D Rivero	0.80	1,024.00
25 July 2025	Draft bidding materials following entry of bidding procedure order (1.4); call with D. Rivero re: same (0.1); coordinate with Verita re: same (0.5).	A Aquije	2.00	2,220.00
26 July 2025	Review final form of Kelly Hamilton purchase agreement re: same (1.4); correspond with D. Pezza re: same (1.3).	R Gaertner	2.70	4,104.00
28 July 2025	Review revised notices for Kelly Hamilton for filing and service.	L Baccash	0.10	169.00
28 July 2025	Correspond with Verita re: assumption notice.	B Lingle	0.10	137.00
28 July 2025	Review notices bid procedures for Kelly Hamilton property (1.4); correspond with W&C re: same (0.5).	D Rivero	1.90	2,432.00
28 July 2025	Revise Kelly Hamilton bidding procedure materials to prepare for filing and service.	A Aquije	1.00	1,110.00
29 July 2025	Review bidding procedures notices (0.3); correspond with W&C re: same (0.2).	D Rivero	0.50	640.00
30 July 2025	Review correspondence with W&C re: bidding procedures and related notices.	D Rivero	0.30	384.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
<b>SUBTOTAL: Asset Sales: Kelly Hamilton</b>			<b>168.13</b>	<b>230,637.74</b>

**Automatic Stay Issues**

8 July 2025	Call with L. Curtis re: legal research re: potential automatic stay violations (0.2); legal research re: same (3.5).	A Branson	3.70	4,107.00
9 July 2025	Legal research re: potential automatic stay violations (3.5); draft summary for L. Curtis re: same (0.5).	A Branson	4.00	4,440.00
<b>SUBTOTAL: Automatic Stay Issues</b>			<b>7.70</b>	<b>8,547.00</b>

**Vendors, Taxes, Insurance and Business Operations Issues**

7 July 2025	Review, revise final utilities order (0.4) and certificate of no objection (0.3).	B Lingle	0.70	959.00
7 July 2025	Draft certification of no objection (0.4) and final order re: Utilities Motion (0.5); incorporate B. Lingle comments re: same (0.3).	G Delgado	1.20	1,188.00
8 July 2025	Review and revise ordinary course professional motion (0.2); review and revise interim comp motion (0.2); correspondence with B. Lingle re: same (0.2).	L Baccash	0.60	1,014.00
8 July 2025	Draft deliverables re: first day operational orders (0.7); call with J. Walz re: same (0.2); incorporate G. Pesce comments re: same (0.2).	G Delgado	1.10	1,089.00
8 July 2025	Review and finalize certificate of no objection re: Utilities Motion (0.2); file same (0.1).	Hirshorn, Deanna	0.30	147.00
10 July 2025	Email B. Lingle re: utility correspondences (0.1); email G. Delgado re: same (0.1); call utility provider (0.2); draft amended utility motion (1.8).	S Kava	2.20	2,816.00
10 July 2025	Emails and discussions with S. Kava re: utilities.	G Delgado	0.20	198.00
11 July 2025	Call with utility provider (0.2); further revise motion and order re: same (0.8); email B. Lingle and L. Baccash re: same (0.1).	S Kava	1.10	1,408.00
14 July 2025	Correspond with S. Kava re: utility provider.	B Lingle	0.30	411.00
14 July 2025	Review utilities motion (0.4); further revise utilities motion (0.8); email B. Lingle re: same (0.1).	S Kava	1.30	1,664.00
15 July 2025	Correspond with W&C team re: utility provider.	B Lingle	0.30	411.00
16 July 2025	Email correspondences with G. Pesce re: utility provider (0.2); review utility provider request (0.6); email utility provider re: resolution (0.2).	S Kava	1.00	1,280.00
<b>SUBTOTAL: Vendors, Taxes, Insurance and Business Operations Issues</b>			<b>10.30</b>	<b>12,585.00</b>



Crown Capital Holdings LLC  
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
<b>Case Administration</b>				
1 July 2025	Correspond with W&C team re: action items.	B Lingle	0.80	1,096.00
1 July 2025	Review work in progress tracker (0.3); correspondence with W&C re: workstream allocations and case strategy (0.4).	A Mitra	0.70	777.00
1 July 2025	Review and respond to emails with J. Walz re: filing notice of commencement (0.1); review precedent re: filing (0.1); review and finalize notice of commencement and meeting of creditors (0.2); file same (0.1); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	0.60	294.00
2 July 2025	Update pleadings file (0.1); update case calendar (0.1).	Hirshorn, Deanna	0.20	98.00
7 July 2025	Correspond with chambers re: July 15 hearing and case calendar (0.4); telephone conference with W&C team re: case timeline (0.3).	B Lingle	0.70	959.00
7 July 2025	Weekly call with W&C team re: ongoing workstreams.	A Aquije	0.10	111.00
7 July 2025	Attention to W&C correspondence re: work in progress.	A Mitra	0.10	111.00
7 July 2025	Attend work in progress call.	G Delgado	0.20	198.00
7 July 2025	Review and respond to email from B. Lingle re: upcoming filings.	Hirshorn, Deanna	0.10	49.00
8 July 2025	Review work in progress report (0.2) and confer with B. Lingle re: same (0.1).	F He	0.30	489.00
8 July 2025	Review schedule of receivership actions (0.2); review, revise amended petition (0.7); revise work in process materials (1.1).	B Lingle	2.00	2,740.00
8 July 2025	Revise petitions re: updating corporate governance materials.	A Aquije	0.50	555.00
8 July 2025	Review email from B. Lingle re: upcoming filing of amended petitions (0.1); confer with S. Kava re: same (0.1); review and respond to emails with G. Pesce, B. Lingle, A. Aquije, C. Campbell, G. Delgado, S. Kava, A. Mitra, J. Walz and L. Baccash re: filing of amended petitions (0.1) review and finalize amended petitions (0.5); file same (0.4); coordinate service of same with Verita (0.1); update pleadings file (0.3); prepare redline of agreement for G. Pesce (0.2).	Hirshorn, Deanna	1.80	882.00
9 July 2025	Review and respond to email with B. Lingle and L. Baccash re: upcoming filings and real time notifications (0.1); update case calendar and real time notifications distribution list (0.2); update pleadings file (0.1); file	Hirshorn, Deanna	3.80	1,862.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	master service list for Verita (0.1); standby for potential filings (3.3).			
10 July 2025	Matter administration (0.9); telephone conference, correspond with chambers re: hearing dates and entry of orders (0.5).	B Lingle	1.40	1,918.00
10 July 2025	Confer with J. Walz and B. Lingle separately re: upcoming hearing (0.1); update real time notifications and calendar to include D. Rivero (0.1).	Hirshorn, Deanna	0.20	98.00
14 July 2025	Review, revise work in process materials.	B Lingle	1.80	2,466.00
14 July 2025	Draft correspondence re: work in progress tracker (0.5); revise same (0.6); further revise same (0.5).	L Curtis	1.60	2,048.00
14 July 2025	Update pleadings file (0.1); update case calendar (0.1); telephone call to Chambers re: proposed order (0.1); coordinate service of orders to shorten notice time with Verita (0.1).	Hirshorn, Deanna	0.40	196.00
15 July 2025	Attend weekly work in progress call.	F He	0.50	815.00
15 July 2025	Telephone conference with W&C team and revise work in process materials.	B Lingle	0.90	1,233.00
15 July 2025	Confer with B. Lingle and others re: work in progress status.	L Curtis	0.30	384.00
15 July 2025	Participate in work in progress call.	S Kava	0.40	512.00
15 July 2025	Attend meeting with W&C re: work in progress and next steps.	D Rivero	0.40	512.00
15 July 2025	Weekly call with W&C team re: ongoing workstreams.	A Aquije	0.40	444.00
15 July 2025	Attend W&C call re: work in progress.	A Mitra	0.40	444.00
15 July 2025	Attend work in progress call.	G Delgado	0.40	396.00
16 July 2025	Prepare and email calendar report to A. Venes.	Hirshorn, Deanna	0.10	49.00
16 July 2025	Review and respond to emails from P. Giovine re: calendar events (upcoming hearing dates) (0.1); review calendar in CompuLaw (0.1); generate and share events report with team (0.1); confer and correspond with D. Hirshorn re: same (0.1).	A Venes	0.40	196.00
17 July 2025	Correspond with W&C team re: action items.	B Lingle	0.30	411.00
17 July 2025	Review docket for updates.	K Wick	0.10	49.00
22 July 2025	Revise witness and exhibit list.	L Curtis	0.20	256.00
22 July 2025	Review and respond to emails with B. Lingle, A.	Hirshorn, Deanna	1.50	735.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Aquije, S. Kava, L. Curtis, P. Giovine, S. Hershey, L. Baccash and D. Rivero re: upcoming hearing (0.1); prepare agenda for July 24, 2025 hearing (0.7); review and respond to email with A. Aquije re: upcoming filing (0.1); review and version up agenda with B. Lingle's comments (0.1); review and finalize certificate of no objection regarding ordinary course of business professionals motion (0.1); file same (0.1); review and finalize certificate of no objection re: interim compensation order (0.1); file same (0.1); coordinate service with Verita re: same (0.1).			
23 July 2025	Telephone conference with City of Jackson, G. Pesce re: Chapel Ridge receivership (0.3); telephone conference with W&C team re: action items (0.2).	B Lingle	0.50	685.00
23 July 2025	Meeting with W&C team re: ongoing workstreams.	A Aquije	0.20	222.00
23 July 2025	Attend pre-filing next steps call (0.2); prepare notices for amended filings (0.9).	G Delgado	1.10	1,089.00
23 July 2025	Review, finalize and file Dundon declaration in support of bidding procedures motion (0.2); review, revise, finalize and file agenda for hearing (0.1); coordinate service of same with Verita (0.1); review witness and exhibit list (0.1); compile and finalize exhibits in preparation for filing witness and exhibit list (1.4); review and respond to emails with A. Aquije, B. Lingle, G. Pesce, L. Baccash, L. Curtis and D. Rivero re: filing of same (0.1); file witness and exhibit list (0.4); coordinate service with Verita (0.1).	Hirshorn, Deanna	2.50	1,225.00
24 July 2025	Prepare compiled version of the Notice of Revised Bidding Procedures for review prior to filing (0.1); review and respond to emails with A. Aquije, D. Rivero, L. Baccash and B. Lingle re: filing of Notice of Revised Bidding Procedures (0.1); finalize and file same (0.1); coordinate service with Verita re: same (0.1).	Hirshorn, Deanna	0.40	196.00
25 July 2025	Emails with J&J Court Transcribers re: estimated cost of July 24, 2025 hearing transcript (0.1); email with B. Lingle re: same (0.1); research re submissions of stipulation and agreed order in the District of New Jersey (0.3); review local rule re: same (0.1); draft shell of application in lieu of motion in support of stipulation and agreed order for S. Kava (0.4).	Hirshorn, Deanna	1.00	490.00
28 July 2025	Update case calendar.	Hirshorn, Deanna	0.10	49.00
29 July 2025	Update pleadings file.	Hirshorn, Deanna	0.10	49.00
29 July 2025	Administration re litigation matters.	M Pena	0.50	245.00
30 July 2025	Email P. Giovine re: indication of bankruptcy (0.1); review same (0.2).	S Kava	0.30	384.00
30 July 2025	Update pleadings file.	Hirshorn, Deanna	0.10	49.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
31 July 2025	Review docket and recently filed documents for key dates (0.3); update case calendar (0.3).	Hirshorn, Deanna	0.60	294.00
<b>SUBTOTAL: Case Administration</b>			<b>31.00</b>	<b>28,360.00</b>

**Case Strategy**

4 July 2025	Research re: corporate governance docs for filing entities.	A Aquije	1.20	1,332.00
6 July 2025	Incorporate G. Pesce comments to Bankwell proposal letter (1.6); correspondence with same and B. Lingle re: same (0.5).	A Mitra	2.10	2,331.00
7 July 2025	Telephone conference with G. Pesce re: Bankwell 8 proposal (0.3); revise same (0.3).	B Lingle	0.60	822.00
7 July 2025	Incorporate B. Lingle comments to Bankwell proposal letter (0.6); correspondence with same and G. Pesce re: same (0.4); email to T. Rizvi (IslandDundon) re: updated draft for review (0.1).	A Mitra	1.10	1,221.00
8 July 2025	Call with G. Pesce re: strategy.	L Baccash	0.20	338.00
15 July 2025	Call with B. Lingle, D. Rivero, S. Kava and others re: case strategy and updates.	L Baccash	0.70	1,183.00
21 July 2025	Coordinate with W&C team re: action items.	B Lingle	0.40	548.00
<b>SUBTOTAL: Case Strategy</b>			<b>6.30</b>	<b>7,775.00</b>

**Claims Administration & Objections**

1 July 2025	Review emails re: creditor outreach (0.3); email S. Hershey re: schedules (0.1); review schedules re: same (0.6); call creditor re: inquiry (0.1).	S Kava	1.10	1,408.00
2 July 2025	Email creditor re: claims administration and case (0.1); call with creditor re: same (0.5); email Lynd re: claims administration (0.1); call with Lynd re: same (0.2); review claim form from creditor (0.2); call with Dundon re: claim issue (0.6); review schedules (0.6); discuss same with F. He (0.1); review bar date order (0.4); email W&C team re: same (0.1).	S Kava	2.90	3,712.00
3 July 2025	Email Lynd re: claim issue (0.1); email A. Rovitz re: same (0.1); email T. Rizvi re: same (0.1); email B. Lingle re: schedules (0.2); email creditor re: settlement (0.3).	S Kava	0.80	1,024.00
8 July 2025	Email creditor re: claim resolution (0.2); call with creditor re: same (0.3); email Lynd re: same (0.1).	S Kava	0.60	768.00
10 July 2025	Multiple email correspondences with J. Walz re: tenant outreach.	S Kava	0.60	768.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
11 July 2025	Email correspondence re: tenant outreach with J. Walz.	S Kava	0.40	512.00
15 July 2025	Email L. Curtis re: bankruptcy notice (0.1); call with creditor re: stipulation (0.1); draft stipulation (0.8); email B. Lingle re: creditor stipulation (0.1).	S Kava	1.10	1,408.00
15 July 2025	Research re: claims allowance.	A Aquije	1.90	2,109.00
16 July 2025	Legal research for L. Curtis re: claims issues (2.3); calls and emails with W&C team re: same (2.3).	G Sutherland	4.60	5,106.00
18 July 2025	Finalize combined notice and proposed order for L. Curtis (0.4); calls and correspondence with same re: same (0.4).	G Sutherland	0.80	888.00
25 July 2025	Call with claimant re: proof of claim issues.	A Aquije	0.10	111.00
<b>SUBTOTAL: Claims Administration &amp; Objections</b>			<b>14.90</b>	<b>17,814.00</b>

**Financing Matters: NOLA**

1 July 2025	Email CIF re: NOLA DIP (0.1); email ad hoc group re: same (0.1); email United States Trustee re: same (0.1); email ArentFox re: credit agreement and order (0.1); email N. Pepin re: credit agreement (0.1); coordinate execution of credit agreement and compile order (0.6); email chambers (0.1); call with N. Pepin re: credit agreement (0.3).	S Kava	1.50	1,920.00
2 July 2025	Review closing checklist (0.2); email correspondences with bank re: lockbox (0.3); call with Dundon re: same (0.2); multiple correspondences with N. Pepin re: same (0.3); preparation and coordination for closing (1.0).	S Kava	2.00	2,560.00
3 July 2025	Email Dundon re: closing statement (0.1); email escrow bank re: accounts (0.1); draft escrow agreement and search re: formation documents (3.4); review and revise bank forms (1.2); call with Dundon re: same (0.5); email correspondences re: closing (0.4).	S Kava	5.70	7,296.00
3 July 2025	Attend closing call (0.3); review stipulation, conference re: calculation of interest (0.3); follow up with client re: budget and closing statement (0.4).	N Pepin	1.00	1,280.00
6 July 2025	Review escrow account details (0.4); email B. Lingle re: same (0.1); email Western Alliance re: same (0.1); review formation documents and supporting documents for opening of accounts (0.1); review NOLA emails re: financing (0.3).	S Kava	1.00	1,280.00
7 July 2025	Email escrow bank re: escrow account (0.1); review records re: NOLA Debtor (0.2); call Western Alliance re: same (0.1); email B. Lingle re: Same (0.1); revise escrow agreement for professional fees based on NOLA and Kelly Hamilton DIP Order (1.4); email	S Kava	2.40	3,072.00

Crown Capital Holdings LLC  
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	correspondences re: NOLA closing (0.5).			
7 July 2025	Conference re: NOLA financing and closing of transaction.	N Pepin	1.00	1,280.00
8 July 2025	Revise escrow agreement (0.6); email B. Lingle re: same (0.1); further revise based on comments from B. Lingle (0.2); compile documents re: escrow account for Western Alliance (0.2); email Western Alliance re: same (0.1); call with Dundon team re: operating agreements and escrow account (0.2); call with B. Lingle re: same (0.1); email DIP orders to Dundon team (0.1); call with B. Goodman re: closing (0.1); call J. Utz re: employee identification number issue (0.1); email Dundon team re: same (0.1); calls with N. Pepin re: cost of goods sold and closing (0.3); email G. Pesce re: same (0.1); review org docs and operating docs for New Orleans entities (0.7); email Lynd re: cost of goods sold (0.1); review and revise escrow agreement from escrow bank (0.3); email G. Pesce re: same (0.1); call with Dundon team member re: cost of goods sold (0.1); review issues with cost of goods sold (0.2); emails escrow bank re: escrow accounts docs (0.2).	S Kava	4.00	5,120.00
8 July 2025	Multiple calls re: interest calculation and status of lockbox accounts (0.5), review security agreement re: same (0.5).	N Pepin	1.00	1,280.00
9 July 2025	Review closing checklist (0.2); revise work in progress tracker re: same (0.1); email B. Lingle re: same (0.1); email Dundon team re: closing outstanding items (0.2); email T. Rizvi re: closing issues (0.2); email correspondence with Dundon re: accounts and insurance for closing (0.2); call re: same with Dundon (0.6); multiple calls with A. Rovitz re: same (0.6); email B. Goodman re: same (0.1); call re: closing (0.7); email A. Rovitz re: insurance (0.1); email B. Goodman re: closing (0.1); email G. Pesce re: updates on closing (0.2).	S Kava	3.40	4,352.00
9 July 2025	Multiple correspondence re: interest rate calculation (0.8); attend closing call with lender's counsel and Dundon (0.8); multiple conference re: closing items (0.9).	N Pepin	2.50	3,200.00
10 July 2025	Telephone conference with W&C, IslandDundon and ArentFox teams re: NOLA DIP closing and bank accounts (0.5); telephone conference with B. Goodman re: NOLA DIP closing (0.2).	B Lingle	0.70	959.00
10 July 2025	Call with T. Rizvi re: closing checklist (0.5); draft correspondence re: escrow agreement (0.3); email B. Goodman re: insurance policies (0.1); coordinate pre-closing call (0.2); correspondence with Dundon re: financial reporting (0.2); email CIF re: reporting (0.1); participate in pre-closing call with Dundon (0.6); review and email DACAs to N. Pepin and B. Lingle (0.3); further email correspondence with Dundon re: financial reporting (0.1); email G. Pesce re: escrow agreement	S Kava	2.90	3,712.00

Crown Capital Holdings LLC  
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1); correspondences with N. Pepin re: lockboxes (0.2); review closing checklist from T. Rizvi (0.1); email N. Pepin re: same (0.1);.			
10 July 2025	Conference with S. Kava re: open items to closing.	N Pepin	0.50	640.00
11 July 2025	Call with T. Rizvi and N. Pepin re: closing NOLA DIP (0.6); email Lynd re: Real Page notice (0.1); draft agreement re: same (0.7); email G. Pesce and B. Lingle (0.1); further revise and draft Real Page agreement (0.5); email Dundon re: interest payments (0.1); email B. Goodman re: same (0.1).	S Kava	2.20	2,816.00
11 July 2025	Correspondence re: accounts and lockboxes and workaround letter.	N Pepin	1.50	1,920.00
14 July 2025	Telephone conference with B. Goodman re: professional fee escrow (0.2); review, revise RealPage agreement (0.4).	B Lingle	0.60	822.00
14 July 2025	Email G. Pesce re: real page agreement and NOLA DIP (0.2); revise real page agreement (0.5); email B. Goodman re: same (0.1); email N. Pepin re: closing next steps (0.1); email T. Rizvi re: operating accounts at Western Alliance (0.1); revise status updates on financing issues in work in progress tracker (0.3); revise real page agreement (0.3); email G. Pesce re: same (0.1); call with Dundon and Lynd re: same (0.2); email Lynd re: same (0.1); multiple emails with A. Woods re: same (0.2).	S Kava	2.20	2,816.00
14 July 2025	Correspondence re: RealPage Agreement (0.5); conference re: NOLA invoice (0.5).	N Pepin	1.00	1,280.00
15 July 2025	Review insurance certifications for closing (0.2); email N. Pepin re: same (0.1); email A. Rovitz re: same (0.1); email RealPage re: revenue direction agreement (0.1); draft escrow agreement (0.7); email B. Goodman re: same (0.1); email T. Rizvi re: accounts (0.1); email Dundon team re: closing, liquidation analysis, monthly operating reports (0.2); call with J. Utz re: RealPage (0.1); calls with N. Pepin re: same (0.2).	S Kava	1.90	2,432.00
15 July 2025	Correspondence with S. Kava re: insurance policies and name of debtors (0.5); telephone conference with B. Goodman re: revising the RealPage letter agreement (0.5).	N Pepin	1.00	1,280.00
16 July 2025	Multiple correspondences with Lynd re: closing (0.5); review and revising clearing account letter (0.5); email N. Pepin re: same (0.1); call with N. Pepin re: closing (0.1); call M. Burstein re: escrow agreement (0.1); review same (0.3); email M. Burstein re: same (0.1); review RealPage screen shots (0.4); email B. Goodman (0.1).	S Kava	2.20	2,816.00
16 July 2025	Draft clearing account letter (1.0); telephone conference with S. Kava and B. Goodman re: same (1.0); coordinate signature and mailing of letter (1.1).	N Pepin	3.10	3,968.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
17 July 2025	Conferences with W&C team re: NOLA financing closing and reporting issues.	G Pesce	0.30	630.00
17 July 2025	Compile closing documents (0.2); email B. Goodman re: same (0.1); email correspondence with N. Pepin re: closing (0.5); email correspondence with T. Rizvi re: closing (0.2); email B. Goodman and DIP lenders re: closing (0.1); review DIP Loan agreement (0.5); email B. Goodman (0.1).	S Kava	1.70	2,176.00
18 July 2025	Conferences with W&C team re: NOLA financing closing and reporting issues.	G Pesce	0.90	1,890.00
21 July 2025	Conferences with W&C team re: NOLA financing closing and reporting issues.	G Pesce	1.00	2,100.00
21 July 2025	Call with Dundon re: financial disclosures (0.3); email consent parties re: financial reporting for CIF (0.1); email Dundon re: same (0.1).	S Kava	0.50	640.00
22 July 2025	Conferences with W&C team re: NOLA financing and reporting issues.	G Pesce	1.10	2,310.00
23 July 2025	Conferences with W&C team re: NOLA financing and reporting issues.	G Pesce	0.20	420.00
29 July 2025	Review CIF notices of default and reservation of rights.	B Lingle	0.30	411.00
<b>SUBTOTAL: Financing Matters: NOLA</b>			<b>51.30</b>	<b>68,678.00</b>

**Financing Matters: Kelly Hamilton**

18 July 2025	Email correspondences with Dundon re: financial reporting (0.3); email Kelly Hamilton lenders re: escrow agreement (0.3).	S Kava	0.60	768.00
20 July 2025	Correspond with W&C, IslandDundon team re: escrow agreement and bank accounts.	B Lingle	0.50	685.00
21 July 2025	Telephone conference with J. Lubertazzi re: professional fee escrow.	B Lingle	0.20	274.00
25 July 2025	Telephone conference with L. Hoffman, J. Utz re: variance reporting.	B Lingle	0.20	274.00
26 July 2025	Call with B. Lingle re: DIP financing issues (0.2); call with G. Pesce, B. Lingle re: DIP issues (0.2).	L Baccash	0.40	676.00
26 July 2025	Review DIP orders and credit agreement (1.2); email G. Pesce re: same (0.2); correspond with L. Baccash re: same (0.1).	S Kava	1.50	1,920.00
<b>SUBTOTAL: Financing Matters: Kelly Hamilton</b>			<b>3.40</b>	<b>4,597.00</b>

**Creditor Meetings & Statutory Committees**



Crown Capital Holdings LLC  
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 July 2025	Confer with S. Kava re: creditor inquiry issues.	F He	0.30	489.00
8 July 2025	Emails with B. Lingle, J. Walz, and G. Delgado re: tenant outreach re: notice of bankruptcy.	A Mitra	0.20	222.00
15 July 2025	Multiple correspondences re: tenant outreach.	S Kava	0.30	384.00
<b>SUBTOTAL: Creditor Meetings &amp; Statutory Committees</b>			<b>0.80</b>	<b>1,095.00</b>

**Exclusivity, Plan & Disclosure Statement: Kelly Hamilton**

1 July 2025	Revise plan and asset purchase agreement.	G Pesce	1.00	2,100.00
1 July 2025	Review and comment on disclosure statement motion.	S Kava	2.40	3,072.00
1 July 2025	Further revise exhibits to disclosure statement motion, incorporating comments from S. Kava (1.5); review and revise disclosure statement motion, incorporating comments from S. Kava (0.8); email correspondence with Verita re: disclosure statement motion (0.2); call with F. He re: same (0.2); research re: same (0.1).	A Aquije	2.80	3,108.00
1 July 2025	Review and update disclosure statement motion exhibits (0.6); emails with Verita re: same (0.6); review and revise same (0.5).	A Mitra	1.70	1,887.00
2 July 2025	Revise plan and asset purchase agreement.	G Pesce	1.00	2,100.00
2 July 2025	Review, revise disclosure statement motion.	B Lingle	2.70	3,699.00
3 July 2025	Revise plan and asset purchase agreement.	G Pesce	1.00	2,100.00
3 July 2025	Correspondence with B. Lingle re: disclosure statement motion.	L Baccash	0.20	338.00
3 July 2025	Correspond with W&C team re: Kelly Hamilton confirmation timeline (0.8); correspond with W&C team re: solicitation (0.7); review, revise disclosure statement motion (1.8).	B Lingle	3.30	4,521.00
3 July 2025	Further revise motion to approve disclosure statement, incorporating comments from B. Lingle.	A Aquije	3.70	4,107.00
4 July 2025	Revise plan and asset purchase agreement (0.5); multiple correspondences re: same (0.5).	G Pesce	1.00	2,100.00
6 July 2025	Review, revise disclosure statement motion.	B Lingle	1.10	1,507.00
7 July 2025	Revise plan(0.5); multiple correspondences re: same (0.5).	G Pesce	1.00	2,100.00
7 July 2025	Review and revise solicitation procedures (1.1); review and revise solicitation motion and order (0.9); review and revise exhibits to solicitation procedures (0.6); multiple correspondence with D. Rivero, A. Aquije, B.	L Baccash	4.10	6,929.00

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RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Lingle re: disclosure statement motion and related filings (0.3); multiple calls with D. Rivero re: same (0.2); call with A. Aquije and B. Lingle re: DS motion (0.5); multiple calls with B. Lingle re: same (0.5).			
7 July 2025	Review, revise exhibits to disclosure statement order (2.4); review, revise disclosure statement motion (0.9); telephone conference with L. Baccash and A. Aquije re: solicitation materials (0.5); correspond with S. Fryman re: disclosure statement tax disclosures (0.2); telephone conference with L. Baccash re: disclosure statement exhibits (0.6); review, revise disclosure statement motion with L. Baccash (0.8).	B Lingle	5.40	7,398.00
7 July 2025	Review and revise bidding procedures motion (1.9); revise application to shorten same (0.1); review and revise disclosure statement motion exhibits, incorporating comments from B. Lingle (2.0); call with L. Baccash and B. Lingle re: same (0.4); further revise exhibits, incorporating comments from L. Baccash and B. Lingle (2.7); review and revise disclosure statement motion, incorporating comments from B. Lingle (1.9); call with L. Baccash, B. Lingle and D. Rivero re: solicitation time line (0.3); review and revise same (0.1).	A Aquije	9.40	10,434.00
8 July 2025	Revise plan and related materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
8 July 2025	Review, revise disclosure statement motion and exhibits.	B Lingle	2.60	3,562.00
9 July 2025	Revise plan and related materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
9 July 2025	Review and revise disclosure statement motion and related exhibits.	L Baccash	1.20	2,028.00
9 July 2025	Review, revise DS motion and exhibits.	B Lingle	0.50	685.00
10 July 2025	Revise plan and related materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
10 July 2025	Review and revise disclosure statement motion.	L Baccash	0.30	507.00
11 July 2025	Revise plan and related materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
11 July 2025	Review, revise disclosure statement motion and exhibits (1.3); Finalize DS motion (0.7).	B Lingle	2.00	2,740.00
11 July 2025	Review and revise motion to approve disclosure statement.	A Aquije	1.30	1,443.00
11 July 2025	Review and respond to emails with A. Aquije re: upcoming filings (0.1); review and finalize Debtors' Motion to Conditionally Approve Disclosure Statement	Hirshorn, Deanna	0.60	294.00

Crown Capital Holdings LLC  
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	and Approve Solicitation Procedures (0.2); file same (0.1); review and finalize application to shorten time re: same (0.1); file same (0.1).			
15 July 2025	Telephone conference with Faegre re: Kelly Hamilton plan.	B Lingle	0.50	685.00
15 July 2025	Review plan and disclosure statement.	S Kava	1.40	1,792.00
16 July 2025	Revise plan and related materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
16 July 2025	Email correspondences with Dundon re: liquidation analysis (0.2); research re: same (0.6); email G. Delgado re: same (0.1); review disclosure statement and motions from precedent cases (0.6).	S Kava	1.50	1,920.00
16 July 2025	Call with S. Kava re: disclosure statement liquidation analysis (0.1); research re: same (0.4).	G Delgado	0.50	495.00
17 July 2025	Revise plan and related materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
17 July 2025	Telephone conference with W&C, IslandDundon teams re: disclosure statement.	B Lingle	0.50	685.00
17 July 2025	Review plan and disclosure statements from precedent cases (1.4); participate in call with Dundon team re: liquidation analysis (0.7).	S Kava	2.10	2,688.00
18 July 2025	Revise plan and related materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
18 July 2025	Call with B. Lingle re: plan revisions.	L Baccash	0.30	507.00
18 July 2025	Call with CIF re: plan (0.2); review plan and disclosure statement (1.0).	S Kava	1.20	1,536.00
21 July 2025	Revise plan and related materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
21 July 2025	Review plan comments from parties in interest (0.3); review objection to disclosure statement and plan (0.3); correspondence with G. Pesce, B. Lingle and others re: same (0.2); review revised disclosure statement insert and related materials (0.4).	L Baccash	1.20	2,028.00
21 July 2025	Prepare issues list re: Kelly Hamilton plan (1.9); telephone conference with L. Baccash re: same (0.4).	B Lingle	2.30	3,151.00
21 July 2025	Revise disclosure statement.	L Curtis	0.20	256.00
21 July 2025	Review disclosure statement objection (0.4); email correspondence with L. Curtis and P. Giovine re: same (0.2); revise disclosure statement re: updates to plan and Spano (1.2); email G. Pesce re: prior disclosure	S Kava	2.60	3,328.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	statement (0.1); review updates from L. Curtis (0.2); draft rider to disclosure statement (0.5).			
21 July 2025	Research re: service requirements for claim objection (0.4); draft section of disclosure statement re: adversary proceeding and Spano objection (2.3).	P Giovine	2.70	2,673.00
22 July 2025	Revise plan and related materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
22 July 2025	Review and revise disclosure statement (0.7); multiple correspondence with G. Pesce, S. Kava and B. Lingle re: same (0.2); call with counsel to Spano, B. Lingle re: disclosure statement objection (0.2); call with G. Pesce, B. Lingle re: plan issues (0.4); review and revise stipulation with Spano (0.7).	L Baccash	2.20	3,718.00
22 July 2025	Telephone conference with Spano, G. Pesce, L. Baccash re: disclosure statement objection (0.3); telephone conference with G. Pesce and L. Baccash re: plan issues (1.0); review, revise disclosure statement (2.9); analyze plan issues (1.3); review, revise liquidation analysis (0.3).	B Lingle	5.80	7,946.00
22 July 2025	Email G. Pesce re: Spano objection (0.1); email B. Lingle re: disclosure statement (0.1); email L. Baccash re: plan (0.1); further revise disclosure statement rider based on objection (2.4); email G. Pesce re: same (0.1); further revise same (0.1); email L. Baccash re: Spano objection (0.1); participate in call with Spano counsel (0.3); email L. Baccash re: plan and disclosure statement (0.1); revise strawman proposal (0.3); draft stipulation for Spano (1.0); email L. Baccash re: same (0.1); further revise stipulation based on comments and suggestions from L. Baccash (1.2); correspondence with B. Lingle re: liquidation analysis (0.1).	S Kava	6.10	7,808.00
23 July 2025	Reviewed and provided comments to plan and disclosure statement (2.8); analysis re: tax considerations of plan (2.7).	S Fryman	5.50	9,845.00
23 July 2025	Review and revise plan (0.7); review and revise disclosure statement (0.6); review and revise Spano stipulation (0.9); call with B. Lingle re: plan and disclosure statement issues (0.3).	L Baccash	2.50	4,225.00
23 July 2025	Telephone conference with S. Fryman re: tax disclosures (0.6); telephone conference with M. Whalen re: liquidation analysis (0.3); telephone conference with Faegre re: Kelly Hamilton plan (0.6); telephone conference with G. Pesce re: plan edits (0.5); revise plan (2.1); telephone conference with Verita re: solicitation (0.3).	B Lingle	4.40	6,028.00
23 July 2025	Email L. Baccash re: Spano Stipulation (0.1); revise stipulation (2.5); email G. Pesce re: same (0.1); further revise (1.2); email G. Pesce (0.1); review comments from UBS counsel (0.6); revise stipulation based on	S Kava	9.60	12,288.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	the same (0.8); email G. Pesce (0.1); email UBS counsel (0.1); revise disclosure statement based on plan revisions (3.7); calls with Dundon team re: liquidation analysis (0.3).			
23 July 2025	Correspond with W&C re: solicitation materials and proposed order.	D Rivero	0.30	384.00
23 July 2025	Revise disclosure statement motion to incorporate revised plan.	A Aquije	1.90	2,109.00
24 July 2025	Review and revise plan (1.8); office conferences with B. Lingle re: same (0.5); review and revise disclosure statement and motion related thereto (2.2); call with G. Pesce and B. Lingle re: plan revisions (0.2); correspondence with United States Trustee re: same (0.2).	L Baccash	4.90	8,281.00
24 July 2025	Revise Kelly Hamilton disclosure statement, plan, and disclosure statement order prior to hearing (1.3); revise Kelly Hamilton plan (2.0), disclosure statement (2.0), disclosure statement order following hearing (2.0).	B Lingle	7.30	10,001.00
24 July 2025	Further review and revise disclosure statement for hearing (3.4); further revise disclosure statement based on new treatment and Spano stipulation (1.6).	S Kava	5.00	6,400.00
24 July 2025	Review and revise solicitation materials, proposed order, and ballots (3.2); correspond with W&C re: same (0.5).	D Rivero	3.70	4,736.00
24 July 2025	Further revise disclosure statement motion and solicitation materials, incorporating further revisions to the disclosure statement and plan (2.0); further revise same, incorporating comments from L. Baccash, B. Lingle, and D. Rivero (3.2); research re: solicitation proceedings (0.3).	A Aquije	5.50	6,105.00
24 July 2025	Draft notices re: plan, disclosure statement, and motion (0.3); incorporate comments re: same (0.3).	G Delgado	0.60	594.00
25 July 2025	Analyze plan and related materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
25 July 2025	Review and revise plan and releases (0.8); review comments to Spano stipulation (0.2); correspondence re: same with G. Pesce, S. Kava, B. Lingle (0.2); multiple correspondence with G. Pesce and B. Lingle re: plan issues (0.5); review and revise liquidation analysis (0.8); review and revise disclosure statement order and exhibits (1.3); review and revise disclosure statement (1.0); call with Island Dundon, S. Kava, B. Lingle re: liquidation analysis (0.4); call with S. Kava and B. Lingle re: same (0.2).	L Baccash	5.40	9,126.00
25 July 2025	Revise Kelly Hamilton plan (1.8); review, revise Kelly Hamilton disclosure statement (1.4); review, revise solicitation materials (1.9); telephone conference with	B Lingle	5.90	8,083.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	L. Baccash re: same (0.4); telephone conference with L. Baccash, S. Kava, IslandDundon team re: liquidation analysis (0.4).			
25 July 2025	Further revise disclosure statement based on comments from B. Lingle (3.4); revise stipulation (0.3); email UBS counsel (0.1); call with Dundon team re: liquidation analysis (0.5); email precedent liquidation analysis to Dundon team (0.1); email Dundon team re: plan (0.1); review stipulation procedures (1.3); email chambers re: filing stipulation (0.1); draft liquidation analysis comments and cover page (1.5).	S Kava	7.40	9,472.00
25 July 2025	Further revise disclosure statement order and exhibits.	A Aquije	2.00	2,220.00
26 July 2025	Review and revise the liquidation analysis and notes related thereto (1.6); review and revise plan (1.3); call with B. Lingle re: plan issues (0.2); call with M. Whalen, B. Lingle, S. Kava re: revisions to liquidation analysis (0.3); review and revise DS order and exhibits re: updates to plan (0.2).	L Baccash	3.60	6,084.00
26 July 2025	Revise Kelly Hamilton plan for AHG comments and correspond with G. Pesce re: same (2.9); revise liquidation analysis and assumptions (1.7); telephone conference with L. Baccash, S. Kava, M. Whalen (ID) re: liquidation analysis (0.5).	B Lingle	5.10	6,987.00
26 July 2025	Participate in call with Dundon team re: liquidation analysis (0.5); revise disclosure statement (2.0).	S Kava	2.50	3,200.00
26 July 2025	Review and revise disclosure statement motion, incorporating comments from L. Baccash and B. Lingle.	A Aquije	0.60	666.00
27 July 2025	Call with J. Millar, G. Pesce, B. Lingle re: plan revisions (0.4); call with B. Lingle to review and revise liquidation analysis (0.4); call with Island Dundon, B. Lingle, S. Kava re: liquidation analysis (0.4).	L Baccash	1.20	2,028.00
27 July 2025	Telephone conference with J. Millar, G. Pesce, L. Baccash re: Kelly Hamilton plan revisions (0.4); review, revise liquidation analysis and conference with L. Baccash re: same (0.4); telephone conference with L. Baccash, S. Kava and IslandDundon re: same (0.4).	B Lingle	1.20	1,644.00
27 July 2025	Review liquidation analysis (0.6); call with IslandDundon, L. Baccash, B. Lingle re: same (0.4); revise disclosure statement (1.7).	S Kava	2.70	3,456.00
28 July 2025	Address plan solicitation any related edits to solicitation materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
28 July 2025	Review and revise the disclosure statement (1.2); call with M. Dundon, M. Whalen, B. Lingle re: liquidation analysis (0.2); review revised disclosure statement order and exhibits for filing (0.2); review revisions from	L Baccash	3.10	5,239.00

Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Spano re: treatment under plan (0.1); correspondence with G. Pesce and B. Lingle re: same (0.1); correspondence with B. Lingle re: same (0.1); review and revise liquidation analysis (0.5); call with M. Whalen re: same (0.3); review and revise plan and call with B. Lingle re: revisions to plan (0.4).			
28 July 2025	Revise Spano ballot (0.3); review and revise the disclosure statement (1.2); telephone conference with M. Dundon, M. Whalen, L. Baccash re: liquidation analysis (0.2); review revised disclosure statement order and exhibits for filing (0.2); correspond with L. Baccash and G. Pesce re: Spano plan treatment (0.4); review and revise liquidation analysis and telephone conference with M. Whalen re: same (0.8); review, revise Kelly Hamilton plan (2.4); telephone conference with L. Baccash re: same (0.4).	B Lingle	5.90	8,083.00
28 July 2025	Review disclosure statement and liquidation analysis based on plan revisions (0.6); email Spano re: stipulation and plan (0.1); call re: liquidation analysis (0.3); call with Spano re: settlement (0.2); coordinate call re: same (0.2); revise disclosure statement and liquidation analysis (3.4).	S Kava	4.80	6,144.00
28 July 2025	Revise form of ballot for unsecured creditors (0.1); revise solicitation materials (1.0); further revise same, incorporating comments from B. Lingle and D. Rivero (0.5).	A Aquije	1.60	1,776.00
28 July 2025	Review and finalize notice of proposed confirmation and sale hearing (0.2); file same (0.1).	Hirshorn, Deanna	0.30	147.00
29 July 2025	Address plan solicitation any related edits to solicitation materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
29 July 2025	Correspondence with B. Lingle, G. Pesce, Spano re: plan issues (0.2); review plan issues (0.2) call with B. Lingle re: same (0.2).	L Baccash	0.60	1,014.00
29 July 2025	Revise Kelly Hamilton plan re: Spano agreement and correspond with Spano re: same (1.9); review, revise notices of filing revised Kelly Hamilton plan, DS and DS order (0.4); correspond with Verita re: publication of Kelly Hamilton confirmation and sale hearing notice (0.2); review solicitation plan (1.5); review, revise ballots for contributed claim election (0.7).	B Lingle	4.70	6,439.00
29 July 2025	Email Spano re: plan and stipulation (0.1); draft disclosure statement notice (0.4); email A. Aquije re: same (0.1); review A. Aquije notices (0.3); prepare DS filing (1.0).	S Kava	1.90	2,432.00
29 July 2025	Final substantive review re: disclosure statement order (1.3) and exhibits re: same (1.3); draft notices of revised versions re: same (0.5); further revise same, incorporating comments from B. Lingle (0.1).	A Aquije	3.20	3,552.00



Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
30 July 2025	Extensive correspondence with B. Lingle, S. Kava re: plan, disclosure statement, liquidation analysis and other filings (0.5); calls with B. Lingle re: same (0.4); review same for filing (1.3).	L Baccash	2.20	3,718.00
30 July 2025	Revise plan (1.2); review, revise DS (0.8); review, revise Spano stipulation (0.6); review, revise supplemental Dundon declaration (0.6); review, revise DS order (0.8); coordinate filing of same (0.3).	B Lingle	4.30	5,891.00
30 July 2025	Review disclosure statement (1.2); review liquidation analysis (0.3); review stipulation and revise same (0.2); compile filings (0.5); revise disclosure statement (0.6); compile disclosure statement for filing (0.3); further revise disclosure statement (0.2); compile disclosure statement for filing (0.2); review precedent stipulations (0.4); further revise stipulation (0.6); email B. Lingle re: same (0.1). prepare documents for filing (0.5).	S Kava	5.10	6,528.00
30 July 2025	Further revise solicitation materials, incorporating final edits to Plan (1.3); coordinate filing re: same (0.5).	A Aquije	1.80	1,998.00
30 July 2025	Review, finalize and file notice of revised plan (0.2); review, finalize and file notice of revised disclosure statement (0.2); emails with B. Lingle, L. Baccash, S. Kava and A. Aquije re: same (0.2); review, finalize and file notice of revised proposed disclosure statement order (0.2); coordinate service of filings with Verita (0.1).	Hirshorn, Deanna	0.90	441.00
31 July 2025	Address plan solicitation and Spano related edits to solicitation materials (0.4); conferences with W&C and stakeholder advisors re: same (0.7).	G Pesce	1.10	2,310.00
31 July 2025	Prepare solicitation materials.	A Aquije	0.40	444.00
<b>SUBTOTAL: Exclusivity, Plan &amp; Disclosure Statement: Kelly Hamilton</b>			<b>225.30</b>	<b>317,813.00</b>

### Executory Contracts & Unexpired Leases

24 July 2025	Continued redactions of Kelly Hamilton Assumed Contracts List (0.4); email D. Rivero re: same (0.1).	Hirshorn, Deanna	0.50	245.00
28 July 2025	Review and finalize Kelly Hamilton Notice of Possible Assumption and Assignment (0.5); file same (0.1); prepare service packages for each individual contract counterparty (0.4); emails with L. Baccash, B. Lingle, D. Rivero and A. Aquije re: service of same (0.1) emails Verita re: service of same (0.2); standby for upcoming filings (2.0).	Hirshorn, Deanna	3.30	1,617.00
<b>SUBTOTAL: Executory Contracts &amp; Unexpired Leases</b>			<b>3.80</b>	<b>1,862.00</b>

### Hearings & Court Matters

1 July 2025	Review case notice (0.3); call with J. Walz re: same	S Kava	0.40	512.00
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Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1).			
22 July 2025	Draft agenda for July 24, 2025 hearing (0.5); draft witness and exhibit list re: same (0.6); revise same, incorporating comments from L. Curtis (0.2).	A Aquije	1.30	1,443.00
24 July 2025	Monitor court hearing.	G Pesce	0.60	1,260.00
24 July 2025	Attend hearing.	S Hershey	0.50	895.00
24 July 2025	Call with G. Pesce, B. Lingle re: preparation for omnibus hearing (0.5); prepare for omnibus hearing (0.9); attend omnibus hearing (0.4).	L Baccash	1.80	3,042.00
24 July 2025	Prepare for Kelly Hamilton bidding procedures and DS hearing (2.9); participate in hearing (0.6).	B Lingle	3.50	4,795.00
24 July 2025	Participate in disclosure statement hearing.	S Kava	0.30	384.00
24 July 2025	Attend hearing for bidding procedures (0.5); draft hearing script for same (0.5).	D Rivero	1.00	1,280.00
24 July 2025	Confer with S. Kava re: hearing (0.3); email Court Transcribers for a copy of the July 24, 2025 hearing (0.1).	Hirshorn, Deanna	0.40	196.00
<b>SUBTOTAL: Hearings &amp; Court Matters</b>			<b>9.80</b>	<b>13,807.00</b>

**Professional Retention & Fees – W&C**

8 July 2025	Correspondence re: retention related issues with F. He.	L Baccash	0.10	169.00
8 July 2025	Review supplemental conflicts results (0.8); confer with L. Baccash and B. Lingle re: conflicts result (0.4); confer with A. Aquije re: same (0.3); review supplement declaration re: same (0.7).	F He	2.20	3,586.00
8 July 2025	Correspond with W&C team re: conflicts report (0.2); prepare supplemental Pesce declaration (0.5).	B Lingle	0.70	959.00
8 July 2025	Review and follow up re: supplemental declaration ISO retention application (0.4); discuss same with team (0.2).	C Campbell	0.60	768.00
8 July 2025	Draft supplemental declaration in support of retention (0.7); call with F. He re: same (0.3); further revise declaration (0.2); further revise same, incorporating comments from L. Baccash (0.5).	A Aquije	1.70	1,887.00
10 July 2025	Review, revise supplemental Pesce declaration.	B Lingle	1.20	1,644.00
10 July 2025	Review and revise supplemental disclosure of potential conflicts (0.9); further revise same, incorporating comments from D. Rivero (0.2).	A Aquije	1.10	1,221.00

Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
11 July 2025	Revise supplemental declaration in support of retention application.	A Aquije	0.30	333.00
14 July 2025	Correspond with same re: supplemental Pesce declaration.	B Lingle	0.60	822.00
14 July 2025	Further revise supplemental declaration re: retention application (0.8); correspondence with Lynd re: same (0.2); research re: same (0.4); further revise same, incorporating comments from D. Rivero and B. Lingle (0.2).	A Aquije	1.60	1,776.00
24 July 2025	Address professional fee inquiries.	G Pesce	4.00	8,400.00
24 July 2025	Review pro forma time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (2.2); coordinate revisions with W&C billing team re: same (0.1).	A Aquije	2.30	2,553.00
25 July 2025	Email correspondence with L. Baccash re: pro forma review.	A Aquije	0.10	111.00
29 July 2025	Correspond with W&C team re: professional fee escrow.	B Lingle	0.30	411.00
29 July 2025	Review pro forma time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	A Aquije	1.70	1,887.00
30 July 2025	Review and revise pro forma time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements.	A Aquije	4.30	4,773.00
<b>SUBTOTAL: Professional Retention &amp; Fees – W&amp;C</b>			<b>22.80</b>	<b>31,300.00</b>

**Professional Retention & Fees – Other**

1 July 2025	Review and revise Dundon retention application and comment on same(0.9); call with A. Mitra re: same (0.2).	C Campbell	1.10	1,408.00
1 July 2025	Review and revise IslandDundon retention application per M. Dundon comments (0.4); research in connection with same (1.4); draft LaPuma declaration in support of IslandDundon retention application (0.8); attention to correspondence re: Dundon conflicts review and required disclosures (0.3); call and correspondence with IslandCapital to confirm disclosure (0.2); correspondence and calls with C. Tuffey re: same and revisions to ID retention application (0.8).	A Mitra	3.90	4,329.00
1 July 2025	Research re: Hilco precedent retention (0.6); draft Hilco retention application (0.9).	G Delgado	1.50	1,485.00

Crown Capital Holdings LLC  
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
1 July 2025	Research for precedent Hilco retention applications for G. Delgado (0.2); draft shell Hilco retention application for G. Delgado (0.5).	Hirshorn, Deanna	0.70	343.00
2 July 2025	Emails with G. Pesce and Dundon Team re: IslandDundon retention application (0.2); finalize same for filing (0.4); emails with D. Hirshorn re: same and coordinate filing (0.4).	A Mitra	1.00	1,110.00
2 July 2025	Draft Hilco retention application.	G Delgado	2.50	2,475.00
2 July 2025	Review and respond to email from A. Mitra re: Dundon retention application (0.1); format precedent retention application for Hilco for G. Delgado (0.8); compile Dundon retention application for review prior to filing (0.5); confer with A. Mitra re: same (0.2).	Hirshorn, Deanna	1.60	784.00
3 July 2025	Review and revise engagement letters for Hilco (3.5); confer with G. Delgado re: Hilco retention application (0.3).	F He	3.80	6,194.00
3 July 2025	Review, revise OCP motion (1.3); review, revise broker engagement letters (0.5).	B Lingle	1.80	2,466.00
3 July 2025	Research re: precedent Hilco engagement letters (1.3); prepare and review redlines re: same against current Hilco engagement letter for F. He (0.7); draft Hilco retention application (3.2).	G Delgado	5.20	5,148.00
3 July 2025	Confer with F. He re: Hilco retention application (0.1); email F. He precedent retention applications (0.1).	Hirshorn, Deanna	0.20	98.00
5 July 2025	Review and revise engagement letters for Hilco (0.7); confer with IslandDundon re: same (0.2); further revise letters (0.5).	F He	1.40	2,282.00
6 July 2025	Review, revise OCP motion (1.1); review, revise interim compensation motion (0.3); review package of documents for pro fee escrow and correspond with S. Kava re: same (0.5).	B Lingle	1.90	2,603.00
7 July 2025	Revise and confer with G. Pesce and S. Landgraber (IslandDundon) re: Hilco engagement letter issues (0.3); review and revise Hilco retention application (2.5); confer with G. Delgado re: same (0.3); review Hilco retention application (1.9); review and revise motion to shorten interim comp motion (0.5).	F He	5.50	8,965.00
7 July 2025	Review, revise OCP motion (0.6); review, revise interim comp motion (0.4); review, revise applications to shorten time for same (0.8).	B Lingle	1.80	2,466.00
7 July 2025	Incorporate F. He comments re: Hilco retention.	G Delgado	2.20	2,178.00
8 July 2025	Review and revise Hilco engagement letter (0.5); confer with S. Landgraber (Island Dundon) and G. Pesce re: same (0.5); confer with S. Kava re: broker	F He	3.40	5,542.00

Crown Capital Holdings LLC  
RE: Project Legal Services

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	retention issues (0.3); further revise letters (0.4); review and revise Hilco retention application (1.7).			
8 July 2025	Coordinate pro fee escrow (0.3); review, revise OCP and interim comp motions (1.6); telephone conference with L. Baccash re: same (0.5).	B Lingle	2.40	3,288.00
8 July 2025	Review revisions re: retention of broker (0.4); discuss same with F. He (0.2); email F. He re: retention app (0.1); review NOLA broker engagement (0.2).	S Kava	0.90	1,152.00
8 July 2025	Incorporate F. He comments re: Hilco retention.	G Delgado	2.00	1,980.00
8 July 2025	Review and finalize ordinary course of business motion (0.2); attend to and file same (0.2); review and finalize application to shorten time re: same (0.1); attend to and file same (0.2); review and finalize Debtors' Interim Compensation Motion (0.2); attend to and same (0.2); coordinate service of filings with Verita (0.2).	Hirshorn, Deanna	1.30	637.00
9 July 2025	Review and revise Hilco retention (0.2); telephone conference with B. Lingle re: same (0.3).	L Baccash	0.50	845.00
9 July 2025	Revise and confer with Hilco re: engagement letter issues.	F He	0.30	489.00
9 July 2025	Email G. Pesce re: Hilco engagement letter (0.1); email S. Landgraber re: Cushman engagement letter (0.1).	S Kava	0.20	256.00
10 July 2025	Review, revise Hilco retention application.	B Lingle	1.60	2,192.00
10 July 2025	Email G. Delgado re: retention application for brokers.	S Kava	0.30	384.00
11 July 2025	Review Hilco markup of engagement letters (0.5); provide issues list and confer with G. Pesce re: same (0.7).	F He	1.20	1,956.00
11 July 2025	Review L&A engagement letter (0.5); draft L&A retention application (3.7); incorporate B. Lingle and L. Baccash comments re: Hilco retention application (0.9).	G Delgado	5.10	5,049.00
12 July 2025	Confer with G. Pesce; B. Lingle re: Hilco re: engagement letter issues (0.4); revise Hilco engagement letters (0.7); confer with S. Landgraber (Island Dundon) re: same (0.2); review and revise Hilco retention application (0.3).	F He	1.60	2,608.00
12 July 2025	Review, revise Hilco engagement letters.	B Lingle	1.50	2,055.00
12 July 2025	Draft real estate broker retention agreement.	G Delgado	2.10	2,079.00
13 July 2025	Draft L&A retention application.	G Delgado	6.20	6,138.00

Crown Capital Holdings LLC  
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
14 July 2025	Review Hilco retention application (0.4); confer with S. Landgraber (IslandDundon) re: Hilco retention letters (0.1); confer with Hilco re: same (0.5).	F He	1.00	1,630.00
14 July 2025	Execute L&A engagement letter (0.1); email L&A re: same (0.1); review precedent retention application (0.4).	S Kava	0.60	768.00
14 July 2025	Incorporate L. Baccash and B. Lingle comments re: Hilco retention and conform same to updated engagement letters (1.9); draft L&A retention application (3.3).	G Delgado	5.20	5,148.00
15 July 2025	Correspondence with B. Lingle re: retention issues and review of UST comments re: same.	L Baccash	0.30	507.00
15 July 2025	Revise ID retention order and respond to UST questions re: same.	B Lingle	2.10	2,877.00
15 July 2025	Emails with B. Lingle re: IslandDundon retention application.	A Mitra	0.10	111.00
15 July 2025	Finalize L&A retention application.	G Delgado	3.80	3,762.00
16 July 2025	Confer with Hilco re: engagement letters (0.1); update engagement letters (0.1); confer with G. Pesce and S. Landgraber re: same (0.1); confer with E. LaPuma re: same (0.1).	F He	0.40	652.00
16 July 2025	Revise L&A retention application (1.4); email G. Delgado re: same (0.1).	S Kava	1.50	1,920.00
17 July 2025	Telephone conference with J. Sponder re: UST comments to ID retention order (0.4); correspond with G. Pesce re ID retention (0.3).	B Lingle	0.70	959.00
18 July 2025	Review Hilco retention comments and confer with G. Delgado (1.0).	F He	1.00	1,630.00
18 July 2025	Coordinate with W&C team, UST re: ID retention.	B Lingle	0.60	822.00
21 July 2025	Review ordinary course revisions from UST (0.2); correspondence and call with B. Lingle re: same (0.2); review ID retention issues from UST (0.2); correspondence with G. Pesce and B. Lingle re: same (0.2).	L Baccash	0.80	1,352.00
21 July 2025	Revise ID retention order.	B Lingle	0.40	548.00
21 July 2025	Incorporate F. He and Hilco comments re: Hilco retention and proof re: same.	G Delgado	1.40	1,386.00
22 July 2025	Confer with G. Delgado re: Hilco retention issues.	F He	0.20	326.00
22 July 2025	Correspond with UST re: OCP and interim comp orders and coordinate filing of same (1.2); revise,	B Lingle	2.30	3,151.00

Crown Capital Holdings LLC  
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	revise Hilco retention application (1.1).			
22 July 2025	Call with Dundon re: retention application (0.1); review OCP motion (0.3); further communication with Dundon re: same (0.2); email B. Lingle and G. Pesce re: same (0.2).	S Kava	0.80	1,024.00
23 July 2025	Correspond with Hilco and B. Lingle re: filing retention application.	G Delgado	0.40	396.00
24 July 2025	Review and revise L&A retention application (0.2); review and revise Hilco retention application (0.1).	L Baccash	0.30	507.00
24 July 2025	Review, revise L&A retention application.	B Lingle	0.70	959.00
24 July 2025	Revise L&A retention application (0.3); email L&A re: same (0.1); calls with L&A re: facts (0.3); revise L&A application (0.5); email L. Baccash and B. Lingle re: same (0.1).	S Kava	1.30	1,664.00
24 July 2025	Incorporate D. Rivero comments re: Hilco retention application.	G Delgado	0.50	495.00
25 July 2025	Review Hilco retention (0.2); review and revise L&A retention (0.2).	L Baccash	0.40	676.00
25 July 2025	Review, revise broker retention applications.	B Lingle	0.70	959.00
25 July 2025	Email L&A re: parties in interest list (0.1); call with L&A re: same (0.3); revise L&A retention application (0.5); email G. Pesce re: same (0.1); further revise L&A retention application (0.3).	S Kava	1.30	1,664.00
25 July 2025	Review compiled Hilco retention application for filing.	G Delgado	0.50	495.00
26 July 2025	Call with S. Kava re: L&A retention application.	L Baccash	0.10	169.00
26 July 2025	Revise broker retention application (0.3); email L&A/Cushman re: same (0.1); further revise application (0.6); email G. Pesce re: same (0.1); email L&A/Cushman re: same (0.1); review Hilco application (0.3); call D. Hirschorn re: same (0.1); call G. Delgado re: same (0.1); review compiled retention application (0.5); call with G. Delgado re: same (0.1).	S Kava	2.30	2,944.00
26 July 2025	Updates re: Hilco retention application and L&A retention application.	G Delgado	2.10	2,079.00
26 July 2025	Review, finalize and file Hilco Retention Application (0.1); coordinate service with Verita (0.1); telephone call with S. Kava re: filing (0.1); review, finalize and file L&A Retention Application (0.1); review, finalize and file Notice of filing additional exhibits to Hilco Retention Application (0.2); coordinate service with Verita re: same (0.1).	Hirshorn, Deanna	0.70	343.00

Crown Capital Holdings LLC  
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
28 July 2025	Review pro forma time entries or expense entries for monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	A Aquije	1.00	1,110.00
29 July 2025	Draft supplement IslandDundon declaration in support of retention.	A Aquije	1.30	1,443.00
30 July 2025	Review Dundon supplemental declaration.	L Baccash	0.10	169.00
30 July 2025	Further revise supplemental declaration for IslandDundon retention application.	A Aquije	0.50	555.00
31 July 2025	Draft amendment to Independent Fiduciary engagement letter (1.0) and correspond with A. Aquije, G. Pesce re: same (1.0).	B Lingle	2.00	2,740.00
31 July 2025	Draft amendment to E. LaPuma engagement letter.	A Aquije	0.90	999.00
<b>SUBTOTAL: Professional Retention &amp; Fees – Other</b>			<b>107.00</b>	<b>129,923.00</b>

**Reports, Schedules & U.S. Trustee Issues**

1 July 2025	Review, revise amended CBRM schedule (0.4); correspond with W&C team re: 341 meeting and notice (0.4).	B Lingle	0.80	1,096.00
2 July 2025	Review and file amended schedules for CBRM (0.2); confer with B. Lingle re: same (0.1); coordinate with Verita re: service of same (0.1).	Hirshorn, Deanna	0.40	196.00
7 July 2025	Correspond with W&C team re: 341 meeting.	B Lingle	0.60	822.00
8 July 2025	Prepare list of reporting obligations.	B Lingle	0.50	685.00
8 July 2025	Review revised petitions and amended schedules (0.6); call with B. Lingle re: same (0.1); email B. Lingle and S. Hershey re: notice of bankruptcy (0.1).	S Kava	0.80	1,024.00
9 July 2025	Participate in 341 meeting (2.5); prepare for same with E. LaPuma and ID team (1.7).	B Lingle	4.20	5,754.00
14 July 2025	Correspondence with tenants re: bankruptcy notice (0.5); review schedules re: litigation (0.6); email correspondence with litigation team re: same (0.3). 4.	S Kava	1.40	1,792.00
15 July 2025	Multiple calls with Dundon team re: next steps for reporting.	S Kava	0.60	768.00
21 July 2025	Revise OCP order for UST comments (0.7); review, revise MORs (0.7); review, revise MORs and coordinate filing of same (0.5).	B Lingle	1.90	2,603.00
21 July 2025	Review and respond to emails with B. Lingle re: monthly operating reports (0.1); review redactions from	Hirshorn, Deanna	2.40	1,176.00

Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	operating reports (0.1); review and redact monthly operating reports (1.1); confer with B. Lingle re: filing of same (0.3); file monthly operating reports (0.8);.			
22 July 2025	Research re: litigation schedule for Kelly Hamilton debtors.	A Aquije	0.50	555.00
25 July 2025	Review amended NOLA schedules.	L Baccash	0.30	507.00
25 July 2025	Review, revise NOLA schedules.	B Lingle	0.40	548.00
25 July 2025	Call with W&C litigation team and Dundon team re: schedules.	S Kava	0.60	768.00
28 July 2025	Review, revise amended NOLA schedules.	B Lingle	0.30	411.00
29 July 2025	Review amended NOLA schedules and coordinate filing of same.	B Lingle	0.30	411.00
30 July 2025	Correspond with D. Hirshorn re: amended NOLA schedules.	B Lingle	0.30	411.00
30 July 2025	Review Court procedures for filing amended schedules (0.2); review precedent re: same (0.3); emails with B. Lingle, A. Aquije, S. Kava, D. Rivero and L. Baccash re: same (0.1); confer with B. Lingle (0.2).	Hirshorn, Deanna	0.80	392.00
31 July 2025	Telephone call to Clerk's office re: Amended Schedules (0.1); file four amended schedules (0.3); coordinate service with Verita (0.1).	Hirshorn, Deanna	0.50	245.00
<b>SUBTOTAL: Reports, Schedules &amp; U.S. Trustee Issues</b>			<b>17.60</b>	<b>20,164.00</b>

**Development of Claims and Causes of Action**

1 July 2025	Draft correspondence to G. Pesce re: litigation strategy (0.2); draft correspondence to B. Lingle re: same (0.4); draft correspondence to G. Pesce re: same (0.2).	L Curtis	0.80	1,024.00
2 July 2025	Draft correspondence re: Rule 2004 requests (0.5); draft Rule 2004 requests (2.8); draft correspondence to S. Hershey re: same (0.3).	L Curtis	3.60	4,608.00
2 July 2025	Draft power of attorney re: issue (0.6); email S. Hershey re: same (0.1); call with local Louisiana counsel re: litigation (0.4); email counsel re: same (0.1); draft notice of bankruptcy (1.0).	S Kava	2.20	2,816.00
2 July 2025	Prepare Silber subpoena (0.8); draft requests for production to Silber (2.3).	P Giovine	3.10	3,069.00
7 July 2025	Revise Spano complaint.	G Pesce	1.00	2,100.00
7 July 2025	Draft correspondence to G. Pesce re: Crown Portfolio litigation (0.3); draft correspondence to S. Hershey re:	L Curtis	1.00	1,280.00



Crown Capital Holdings LLC  
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	same (0.7).			
8 July 2025	Revise Spano complaint.	G Pesce	1.00	2,100.00
8 July 2025	Review and revise Spano complaint.	S Hershey	1.00	1,790.00
8 July 2025	Draft correspondence re: Crown portfolio litigation (1.5); draft further correspondence re: status of same (1.0); draft further correspondence re: same (0.7); draft further correspondence re: same (0.8); draft correspondence with G. Pesce re: same (0.8); confer with A. Branson re: automatic stay research (0.2); draft further correspondence to A. Branson re: same (0.4); confer with S. Hershey re: same (0.1); confer re: Crown portfolio litigation (0.2); draft correspondence to G. Pesce and S. Hershey re: same (1.8).	L Curtis	7.50	9,600.00
8 July 2025	Review and revise complaint re: adversary proceeding.	A Aquije	2.00	2,220.00
9 July 2025	Review legal research from A. Branson re: automatic stay.	L Curtis	1.00	1,280.00
10 July 2025	Review and revise adversary complaint re: Spano.	S Hershey	1.00	1,790.00
10 July 2025	Revise adversary complaint (4.5); draft correspondence re: same (0.4).	L Curtis	4.90	6,272.00
10 July 2025	Draft correspondence to G. Pesce re: Crown Portfolio litigation.	L Curtis	0.60	768.00
10 July 2025	Review and revise complaint re: adversary proceeding (1.1); review state court docket re: same (0.4).	A Aquije	1.50	1,665.00
11 July 2025	Confer with S. Hershey re: automatic stay letter (0.2); draft letter re: automatic stay (1.5); conduct legal research re: same (1.6); further draft automatic stay letter (0.8); confer with W&C team re: same (0.1); continue drafting same (3.4).	L Curtis	7.60	9,728.00
12 July 2025	Review and revise letter re: stay violation.	S Hershey	1.10	1,969.00
12 July 2025	Draft automatic stay letter.	L Curtis	0.10	128.00
13 July 2025	Revise automatic stay letter (1.5); draft correspondence re: same (0.2).	L Curtis	1.70	2,176.00
14 July 2025	Review claim objection issues and conferences re: same.	G Pesce	1.00	2,100.00
14 July 2025	Correspondence with B. Goodman, L. Curtis and B. Lingle re: discovery and litigation issues.	S Hershey	0.50	895.00
14 July 2025	Telephone conference with ArentFox and S. Hershey re: AHG's rule 2004 discovery requests (0.2).	B Lingle	0.20	274.00
14 July 2025	Telephone conference with S. Hershey re: Spano	B Lingle	0.20	274.00

Crown Capital Holdings LLC  
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	adversary complaint.			
14 July 2025	Draft correspondence re: adversary complaint (1.1); confer with S. Hershey re: same (0.3); draft correspondence to S. Hershey re: same (0.5); confer with P. Giovine re: same (0.3).	L Curtis	2.20	2,816.00
14 July 2025	Prepare tracker of litigation against each debtor, summarizing each case, procedural posture and future filing deadlines (4.8); search dockets for litigation against debtors (3.1).	P Giovine	7.90	7,821.00
14 July 2025	Email correspondence with L. Curtis re: purported liens and levies searches (0.1); email request to vendor re: same (0.1).	A Venes	0.20	98.00
15 July 2025	Revise Spano complaint.	G Pesce	1.00	2,100.00
15 July 2025	Correspond with L. Curtis and G. Pesce re: Spano complaint and claim objection.	S Hershey	0.60	1,074.00
15 July 2025	Correspond with L. Curtis, J. Utz and opposing counsel re: subpoena on Lynd.	S Hershey	0.70	1,253.00
15 July 2025	Confer with S. Hershey re: adversary complaint (0.1); confer with P. Giovine re: same (0.1); confer with S. Hershey re: same (0.1); revise correspondence re: same (1.7); confer with P. Giovine re: same (0.1); revise correspondence re: same (0.8); confer with S. Hershey re: same (0.1); revise correspondence re: same (3.5).	L Curtis	6.50	8,320.00
15 July 2025	Draft correspondence re: Crown Portfolio litigation (0.3); confer with S. Hershey re: same (0.1).	L Curtis	0.40	512.00
15 July 2025	Legal research re: adversary proceeding (3.1); prepare filing checklist for adversary complaint, summons and notice of appearance (2.0); compile relevant provisions in bankruptcy and local rules for formatting (0.6).	P Giovine	5.70	5,643.00
15 July 2025	Multiple correspondence with CSC Global re: lien searches (0.2); request additional property searches re: same (0.1); correspond with W&C team re: same (0.1).	A Venes	0.40	196.00
16 July 2025	Revise adversary complaint (0.9); confer with S. Hershey re: same (0.2); confer with A. Aquije re: same (0.2); draft correspondence re: same (0.9); confer with S. Hershey re: same (0.1); further revise adversary complaint (0.3); confer with P. Giovine re: same (0.3); further revise adversary complaint (1.1); confer with A. Venes re: same (0.1); further revise adversary complaint (0.4); confer with P. Giovine re: same (0.1); further revise adversary complaint (2.5); draft correspondence re: filing of same (1.0); confer with A. Aquije re: same (0.2); further revise adversary complaint (2.1); draft correspondence re: same (0.8).	L Curtis	11.20	14,336.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 July 2025	Call with L. Curtis re: adversary complaint (0.2); research re: same (3.5); further revise adversary complaint, incorporating comments from L. Curtis (0.7); call with L. Curtis re: same (0.1); research re: service of adversary complaints (0.2); final review re: adversary complaints (1.0); coordinate filing and service re: same (0.3).	A Aquije	6.00	6,660.00
16 July 2025	Revise adversary complaint.	G Sutherland	2.30	2,553.00
16 July 2025	Cite check and proof adversary complaint (6.8); research re: sample summons (1.1); prepare summons (0.6); meet with White & Case team re: adversary proceeding (0.4); research re: hearing dates for pretrial hearing (0.7); legal research re: adversary complaint (3.6); legal research re: required filings for claim objection (2.1); prepare notice of objection (1.4).	P Giovine	16.70	16,533.00
16 July 2025	Update exhibits in preparation for adversary filing (0.2); review and respond to emails with L. Curtis, P. Giovine, and A. Venes re: upcoming filing (0.1); review NJ Court website re: filing adversary proceeding (0.2); standby for potential filing of adversary proceeding (0.9); email A. Venes exhibits and advise of potential filing (0.1); research precedent re: adversary (0.2).	Hirshorn, Deanna	1.70	833.00
16 July 2025	Conference with vendor re: status of lien property searches.	A Venes	0.10	49.00
17 July 2025	Telephone conference with L. Curtis re: Spano claim objection (0.2); review Spano POC and complaint (1.7).	B Lingle	1.90	2,603.00
17 July 2025	Confer with G. Sutherland and others re: adversary complaint (0.2); draft correspondence to G. Pesce re: same (0.6); revise adversary complaint (2.1); confer with B. Lingle re: same (0.2); further revise adversary complaint (0.1); confer with G. Sutherland and others re: same (0.4); revise same (0.9); confer with G. Sutherland re: same (0.1); further revise adversary complaint (0.8); confer with S. Hershey re: same (0.2); further revise adversary complaint (0.2); confer with G. Sutherland re: same (0.1); further revise adversary complaint (3.0).	L Curtis	8.90	11,392.00
17 July 2025	Call with L. Curtis, P. Giovine, and G. Sutherland re: adversary complaint research (0.2); draft exhibit re: same (1.0); call with team re: ongoing workstreams re: adversary proceeding (0.3); draft notice re: same (0.2); review proposed order re: same (0.4).	A Aquije	2.10	2,331.00
17 July 2025	Revise complaint for L. Curtis (3.3); calls and emails with W&C team re: open issues and next steps (3.3); prepare proposed order re: same (3.3).	G Sutherland	9.90	10,989.00
17 July 2025	Call with White & Case team re: research concerning claim objection in adversary proceeding (0.4); research re: procedural requirements for adversary proceeding with claim objection (1.7); revise notice of objection to	P Giovine	3.90	3,861.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	include details re: counts and complaint (1.8).			
17 July 2025	Review and distribute to team property search results in connection with adversary proceeding (0.1); correspond with vendor re: status of second property search (0.1); follow up with team re: status of adversary proceeding filing (0.1); assist with formatting issues in proposed order granting relief in adversary complaint (0.4); standby, prepare for potential filing of new adversary proceeding (4.5); correspond with team re: same (0.1).	A Venes	5.30	2,597.00
18 July 2025	Correspond with L. Curtis re: Spano complaint.	B Lingle	0.60	822.00
18 July 2025	Revise adversary complaint (0.7); confer with P. Giovine re: same (0.1); draft correspondence re: Crown portfolio litigation (0.6); draft correspondence re: adversary complaint (0.7); confer with S. Hershey re: same (0.1); draft correspondence re: filing of same (2.4); confer with P. Giovine re: same (0.1); draft correspondence re: same (0.9); confer with P. Giovine re: same (0.1); confer with P. Giovine re: same (0.3).	L Curtis	6.00	7,680.00
18 July 2025	Final review re: adversary complaint (0.5); final review re: complaint notices and summons (0.5).	A Aquije	1.00	1,110.00
18 July 2025	Revise proposed order for L. Curtis and S. Hershey re: adversary .	G Sutherland	0.30	333.00
18 July 2025	Research re: addresses for adversary proceeding service (1.4); research re: adversary proceeding parties registered agents (0.8); legal research re: adversary proceeding service and notice (3.6); further legal research re: same (2.9); revise notice of objection (0.9); review certification of service (0.6).	P Giovine	10.20	10,098.00
18 July 2025	Assist with finalization and filing of adversary complaint (1.0); confer with L. Curtis re: same (0.2); telephone call to Clerk of Court to expedite the issuance of Summons (0.1); review and finalize notice of objection to claim for L. Curtis (0.3); file same (0.1); open CompuLaw calendar for adversary proceeding (0.2); coordinate with Managing Clerks to receive real time notifications (0.1); update case calendar (0.1); coordinate with LA office services and mailroom to print and mail physical service of adversary filings (0.5); emails with P. Giovine re: same (0.2); prepare certificate of service re: same (0.2).	Hirshorn, Deanna	3.00	1,470.00
18 July 2025	Correspond with team re: assistance with new adversary proceeding filing (0.1); review/PDF documents for filing and send to team for review ahead of submission (0.2); correspond with D. Hirshorn re: same (0.1).	A Venes	0.40	196.00
18 July 2025	Research re: service of notice of objection in adversary proceeding.	R Greene	0.60	363.00
19 July 2025	Research re: service of notice of objection in adversary	P Giovine	1.10	1,089.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	proceeding.			
21 July 2025	Review and respond to emails with P. Giovine re: certificate of service (0.1); finalize and file same (0.1); update pleadings file (0.1).	Hirshorn, Deanna	0.30	147.00
22 July 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	1.10	2,310.00
23 July 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	1.00	2,100.00
23 July 2025	Review, revise Spano stipulation.	B Lingle	0.60	822.00
24 July 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	0.20	420.00
24 July 2025	Correspondence with P. Giovine re: discovery and litigation.	S Hershey	0.90	1,611.00
25 July 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	0.10	210.00
25 July 2025	Correspond with L. Curtis and P. Giovine re: 2004 discovery.	S Hershey	0.60	1,074.00
25 July 2025	Confer with W&C team re: discovery.	J Yoo	0.60	822.00
25 July 2025	Confer with S. Hershey re: rule 2004 requests (0.5); revise rule 2004 requests (0.2); revise rule 2004 requests (1.3); revise rule 2004 requests (1.7); revise same (0.4).	L Curtis	4.10	5,248.00
25 July 2025	Draft correspondence re: status of litigation workstreams (0.5); confer re: Crown Portfolio litigation (0.2); draft correspondence re: status of litigation workstreams (1.1); confer with P. Giovine re: same (0.2); confer with J. Yoo re: same (0.4); confer with S. Hershey re: same (0.1); draft correspondence re: Crown Portfolio litigation (0.2).	L Curtis	2.70	3,456.00
25 July 2025	Call with S. Hershey & L. Curtis re: litigation tasks (0.5); research re: procedures (0.3); legal research re: discovery (0.3); calls re: service (0.4); calls with state re: service (0.3); research service requirements (0.9).	P Giovine	2.70	2,673.00
25 July 2025	Revise Silber 2004 subpoena (0.4); legal research re: claims (1.2); factual research re: capital structure (1.1); legal research re: default judgment and execution on judgment (0.6); draft letter re: potential adversary complaint (4.8).	P Giovine	8.10	8,019.00
25 July 2025	Review and respond to emails with P. Giovine re: upcoming service of subpoena (0.1); coordinate with NY Copy Center and NY Mailroom re: service of subpoena (0.2).	Hirshorn, Deanna	0.30	147.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
26 July 2025	Prepare shell for motion to quash Silber subpoena.	P Giovine	0.60	594.00
27 July 2025	Review 2004 requests from Silber (0.3); review memo re: potential complaint against Silber (1.4).	S Hershey	1.70	3,043.00
27 July 2025	Confer with W&C team re: discovery.	J Yoo	0.10	137.00
27 July 2025	Draft correspondence to P. Giovine re: Crown litigation workstream statuses.	L Curtis	0.20	256.00
27 July 2025	Edit letter re: potential adversary complaint, detailing causes of action and procedure (1.4); legal research for letter re: claims (0.6); legal research for letter re: procedures re: same (0.4); draft background section of Motion to Quash Silber Subpoena (0.8).	P Giovine	3.20	3,168.00
28 July 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	0.90	1,890.00
28 July 2025	Review and revise memo re: potential estate claims.	S Hershey	0.50	895.00
28 July 2025	Email P. Giovine re: facts for complaint (0.1); review facts and provide comments re: same (0.6); calls with P. Giovine and Dundon re: same (0.3).	S Kava	1.00	1,280.00
28 July 2025	Correspondence with P. Giovine re: indication of bankruptcy (0.5); review docket history of cases (0.1); call insurance company re: complaints (0.1); email correspondence with insurance company re: same (0.1); email S. Landgraber re: same (0.1); email S. Hershey re: indications of bankruptcy (0.1); email Lynd re: same (0.1).	S Kava	1.10	1,408.00
28 July 2025	Draft memo re: potential causes of action.	A Aquije	0.30	333.00
28 July 2025	Call Department of Corrections re: Silber (0.3); contact State Marshal re: service of subpoena on Silber (0.2); research local rules re: service (0.2); edit subpoena and email to State Marshal re: service (1.3); turn changes for memo re: potential adversary complaint, noting potential claims and calculating damages (1.7); research re: local rules to respond to motion for 2004 discovery (0.8); research re: local rules and precedent concerning notice of subpoena (0.9).	P Giovine	5.40	5,346.00
28 July 2025	Draft indications of bankruptcy for Louisiana state (2.6); research re: local dockets to determine counsel to file Indications of Bankruptcy (0.9); draft Opposition to 2004 Motion (3.3).	P Giovine	6.80	6,732.00
29 July 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	1.20	2,520.00
29 July 2025	Review and revise objection to 2004 motion (5.0); confer with W&C team re: objection (1.5); conduct research in support of objection (2.5); confer with W&C team re: discovery (1.5).	J Yoo	10.50	14,385.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 July 2025	Review and revise objection to Silber 2004 motion (1.1); research for J. Yoo re: same (0.3).	A Aquije	1.40	1,554.00
29 July 2025	Draft opposition to motion for 2004 discovery (2.4); research re: service required for Opposition to Silber 2004 Motion and local rules for filing (1.3).	P Giovine	3.70	3,663.00
29 July 2025	Legal research re: FRBP 2004 (3.4); factual research re: publicly available information responsive to Silber 2004 requests (2.9); factual research re: Silber (0.5); contact legal assistant M. Pena re: overnight check to State Marshal (0.2).	P Giovine	7.00	6,930.00
29 July 2025	Review and respond to emails with P. Giovine re: service of opposition to motion for 2004 discovery.	Hirshorn, Deanna	0.10	49.00
30 July 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	1.30	2,730.00
30 July 2025	Correspond with M. Dundon and D. Kamensky re: litigation issues (0.5); review and revise common interest agreement (1.6).	S Hershey	2.10	3,759.00
30 July 2025	Call with M. Dundon, S. Hershey, B. Lingle re: litigation strategy.	L Baccash	0.40	676.00
30 July 2025	Review memorandum re: causes of action held by estate.	L Baccash	0.20	338.00
30 July 2025	Telephone conference with S. Hershey, M. Dundon re: adversary complaint and potential litigation re: Silber.	B Lingle	0.40	548.00
30 July 2025	Draft and revise objection to 2004 motion (0.5); confer with W&C team re: objection to 2004 motion (0.5); confer with W&C team re: rule 2004 subpoena (0.3); review notice of rule 2004 discovery and confer with W&C team re: same (0.2).	J Yoo	1.50	2,055.00
30 July 2025	Prepare filing checklist for Opposition to 2004 Motion (0.6); research re: deadline to respond to 2004 Motion (0.9); draft common interest agreement (2.6); legal research re: party's obligation to notify court of bankruptcy (0.6); legal research re: issue in state litigation (1.8); draft letters to state court plaintiffs re: enforcement of automatic stay (0.9); draft Notice of Subpoena (1.6).	P Giovine	9.00	8,910.00
30 July 2025	Revise memo re: potential adversary proceeding.	P Giovine	0.40	396.00
30 July 2025	Review and respond to emails with P. Giovine re: filing of notice of service of subpoena (0.1); review, finalize and file same (0.1); coordinate service with Verita re: same (0.1).	Hirshorn, Deanna	0.30	147.00
31 July 2025	Prepare materials and analysis re: potential estate claims against targeted parties.	G Pesce	0.90	1,890.00



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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
31 July 2025	Correspond with J. Millar and D. Kamensky re: potential claims.	S Hershey	0.20	358.00
31 July 2025	Confer with W&C team re: document production in response to subpoena (0.5); confer with W&C team re: adversary proceeding (0.5); review notice to stay adversary proceeding (0.7).	J Yoo	1.70	2,329.00
31 July 2025	Email P. Giovine re: emails to local litigation (0.1); draft summary re: CIF / Laguna dispute and analysis re: case (1.4); email L. Baccash re: same (0.1); review and revise letters to local counsel staying local litigation (0.5).	S Kava	2.10	2,688.00
31 July 2025	Communications re: Spano stipulation and adversary proceeding with litigation team (0.3); email G. Pesce re: same (0.1); email J. Yoo re: same (0.1).	S Kava	0.50	640.00
31 July 2025	Draft Notice of Stipulation and Agreed Order Among the Debtors, Spano LLC and Acquiom Agency Services LLC (3.2); legal research re: applicability of stay to direct suit against insurance company (2.2); legal research re: willful violation of automatic stay (0.9); draft letters to state court plaintiffs re: automatic stay (3.0); document review and redact Personally Identifiable Information for production in response to subpoena for third party discovery in BFV case concerning debtors (2.8).	P Giovine	12.10	11,979.00
31 July 2025	Intake new data, validate, and stage for processing (0.3); prepare document images for redactions and perform quality insurance (0.5).	T Chen	0.80	392.00
31 July 2025	Assist with document upload (0.1); populate metadata fields (0.1); run optical character recognition (0.1); update index (0.1); run quality control checks (0.1).	G Chemborisov	0.50	245.00
31 July 2025	Assist T. Chen with a processing request for EID17175.	S Binuya	0.50	210.00
<b>SUBTOTAL: Development of Claims and Causes of Action</b>			<b>267.30</b>	<b>311,189.00</b>
<b>Asset Sales: NOLA</b>				
9 July 2025	Email S. Landgraber re: NOLA property (0.1); email A. Rovitz re: same (0.1); email D. Pezza re: APA for NOLA (0.2).	S Kava	0.40	512.00
10 July 2025	Review first day declaration, DIP motion, and supporting documents re: background of NOLA properties (1.0); call with D. Pezza re: same (0.2).	S Kava	1.20	1,536.00
12 July 2025	Review broker listing for NOLA properties (0.2) and correspond with S. Landgraber (ID) re: same (0.1).	B Lingle	0.30	411.00
15 July 2025	Research re: motion approving bid procedures for NOLA Debtor assets (0.3); draft motion approving bid	A Aquije	2.25	2,492.14



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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	procedures for NOLA Debtor assets (2.1).			
16 July 2025	Draft bidding procedures motion for NOLA Debtors assets (2.1); draft declaration in support of bidding procedures motion (0.9).	A Aquije	3.00	3,330.00
17 July 2025	Draft bidding procedures motion for NOLA Debtors assets.	A Aquije	2.50	2,775.00
18 July 2025	Draft bidding procedures order (1.0) and exhibits for NOLA Debtors (1.0).	A Aquije	2.00	2,220.00
19 July 2025	Coordinate with G. Pesce, W&C team re: NOLA sale process.	B Lingle	0.50	685.00
20 July 2025	Final substantive cite check re: bidding procedures for NOLA debtors.	A Aquije	0.50	555.00
21 July 2025	Review and revise NOLA bid procedures.	D Rivero	0.70	896.00
21 July 2025	Review and revise NOLA debtor bidding procedures motion, incorporating comments from D. Rivero.	A Aquije	1.22	1,358.12
22 July 2025	Conferences with ArentFox and W&C teams de status of sale procedures and bidder outreach.	G Pesce	1.00	2,100.00
22 July 2025	Draft declaration in support of NOLA Debtors bidding procedures motion.	A Aquije	0.60	666.00
23 July 2025	Conferences with ArentFox and W&C teams re status of sale procedures and bidder outreach.	G Pesce	0.20	420.00
25 July 2025	Conferences with ArentFox and W&C teams re status of sale procedures and bidder outreach.	G Pesce	0.50	1,050.00
25 July 2025	Review and revise NOLA bid procedures.	L Baccash	1.80	3,042.00
25 July 2025	Review, revise NOLA bidding procedures.	B Lingle	1.10	1,507.00
25 July 2025	Review and revise bid procedures for NOLA debtors (3.5); correspond with W&C re: same (0.3).	D Rivero	3.80	4,864.00
25 July 2025	Further revise NOLA bidding procedures order, incorporating comments from D. Rivero (0.5); further revise motion, incorporating comments from L. Baccash and B. Lingle (1.0).	A Aquije	1.50	1,665.00
26 July 2025	Review and revise NOLA bid procedures.	L Baccash	0.90	1,521.00
26 July 2025	Draft form purchase agreement for NOLA debtors.	R Gaertner	1.40	2,128.00
26 July 2025	Review, revise NOLA bidding procedures order.	B Lingle	2.10	2,877.00
26 July 2025	Further revise NOLA debtor bidding procedure motion, incorporating comments from L. Baccash and B.	A Aquije	1.20	1,332.00

Crown Capital Holdings LLC  
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Lingle.			
27 July 2025	Call with G. Pesce and B. Lingle re: NOLA bid procedures (0.2); calls with B. Lingle re: same (0.3); review and revise timeline (0.2).	L Baccash	0.70	1,183.00
27 July 2025	Prepare sale and confirmation timeline for NOLA (0.5); telephone conference with G. Pesce and L. Baccash re: NOLA bidding procedures (0.2).	B Lingle	0.70	959.00
27 July 2025	Review and revise bid procedures for NOLA debtors (2.2); correspond with W&C re: same (0.2).	D Rivero	2.40	3,072.00
27 July 2025	Further revise NOLA debtor bidding procedure motion (4.0); research re: same (0.5); further revise same, incorporating comments from D. Rivero (0.4).	A Aquije	4.90	5,439.00
28 July 2025	Conferences with ArentFox and W&C teams re status of sale procedures and bidder outreach.	G Pesce	1.00	2,100.00
28 July 2025	Review and revise bid procedures for NOLA (1.8); call with G. Pesce and B. Lingle re: sale timeline issues for NOLA (0.2); multiple correspondence with B. Lingle re: same (0.3).	L Baccash	2.30	3,887.00
28 July 2025	Review and revise NOLA bid procedures (1.8); telephone conference with G. Pesce and L. Baccash re: NOLA sale and confirmation timeline (0.2); multiple correspondence with L. Baccash re: same (0.3).	B Lingle	2.30	3,151.00
28 July 2025	Review and revise bid procedures for NOLA debtors.	D Rivero	2.80	3,584.00
28 July 2025	Further revise NOLA debtor bidding procedures, incorporating comments from B. Lingle (1.1); further revise same, incorporating comments from D. Rivero (1.1); further revise same, incorporating comments from NOLA DIP Lender (0.7).	A Aquije	2.90	3,219.00
29 July 2025	Conferences with AF and W&C teams de status of sale procedures and bidder outreach.	G Pesce	0.70	1,470.00
29 July 2025	Review NOLA bidding procedures.	B Lingle	0.50	685.00
29 July 2025	Revise NOLA bidding procedures motion (0.2); further revise same, incorporating comments from B. Lingle and NOLA DIP lender (0.5).	A Aquije	0.70	777.00
30 July 2025	Conferences with ArentFox and W&C teams de status of sale procedures and bidder outreach.	G Pesce	1.20	2,520.00
30 July 2025	Review comments to NOLA bid procedures.	L Baccash	0.20	338.00
30 July 2025	Further revise NOLA bidding procedure motions, incorporating comments from NOLA DIP Lender.	A Aquije	0.40	444.00
31 July 2025	Conferences with ArentFox and W&C teams de status	G Pesce	0.30	630.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	of sale procedures and bidder outreach.			
31 July 2025	Review, revise and transmit short form NOLA purchase agreement.	D Pezza	1.70	3,570.00
31 July 2025	Revise timeline for NOLA bid procedures (0.3); multiple calls with B. Lingle re: revisions to NOLA bid procedures and related matters (1.3).	L Baccash	1.60	2,704.00
31 July 2025	Revise timeline for NOLA bid procedures (0.2); multiple telephone conferences with L. Baccash re: revisions to NOLA bid procedures and related matters (1.6).	B Lingle	1.80	2,466.00
31 July 2025	Further revise NOLA bidding procedures motion.	A Aquije	1.00	1,110.00
<b>SUBTOTAL: Asset Sales: NOLA</b>			<b>60.77</b>	<b>83,250.26</b>
<b>Exclusivity, Plan &amp; Disclosure Statement: NOLA</b>				
15 July 2025	Draft NOLA disclosure statement.	S Kava	0.60	768.00
31 July 2025	Correspond with Chambers re: court dates and timeline for NOLA.	B Lingle	0.30	411.00
<b>SUBTOTAL: Exclusivity, Plan &amp; Disclosure Statement: NOLA</b>			<b>0.90</b>	<b>1,179.00</b>
<b>TOTAL</b>			<b>1,009.10</b>	<b>1,290,576.00</b>