

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET

Debtor: CBRM Realty, Inc., et al.¹ Applicant: Ken Rosen Advisors PC
Case No.: 25-15343 (MBK) Client: CBRM Realty, Inc., et al.
Chapter: 11 Case Filed: May 19, 2025

**SECTION 1
FEE SUMMARY**

☐ Interim Fee Application No. _____ or ☒ Final Fee Application

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fee Requested:	\$ <u>54,395.00</u>	\$ <u>79.25</u>
Total Fees Allowed To Date:	\$ <u>0</u>	\$ <u>0</u>
Total Retainer (If Applicable)	\$ <u>0</u>	\$ <u>0</u>
Total Holdback (If Applicable)	\$ <u>0</u>	\$ <u>0</u>
Total Received By Applicant	\$ <u>0</u>	\$ <u>0</u>

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years Of Professional Service)	HOURS	RATE	FEE
1. Kenneth A. Rosen	1980	81.7	650.00	53,105
2. Para		12.9	100.00	1,290
3.				
4.				
5.				
6.				
7.				

Fee Totals: 54,395.00
Disbursements Totals: 79.25
Total Fee Application 54,474.25

¹ 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 (7528), RH Windrun LLC (0122), RH New Orleans Holdings LLC (7528), and RH LLC (7528). The location of the Debtors' service address in these chapter 11 cases is: In re CBRM Realty, Inc., et al., Case No. 25-15343-MBK, LLP, 1221 Avenue of the Americas, New York, New York 10020.



251534325102400000000001

**SECTION II
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	PARA	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0	0	0
b) Asset Disposition Sales, leases, abandonment and related transaction work.	4.1	0	2,665.00
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.	0	0	0
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	5.2	0	3,380.00
e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	25.3	0	16,445.00
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.6	0	390.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0	0	0.00
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	12.2	12.9	9,220.00
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others.	0.6	0	390.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	14.3	0	9,295.00
k) Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	3.4	0	2,210.00
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	1.2	0	780.00
m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	14.3	0	9,295.00

SERVICES RENDERED	HOURS	PARA	FEE
n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362.	0	0	0.00
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	.5	0	325.00
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0	0	0.00
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0	0	0.00
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0	0	0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0	0	0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and brining accounting current.	0	0	0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0	0	0.00
v) Valuation Appraise or review appraisals of assets.	0	0	0.00
w) Travel Time	0	0	0.00
SERVICE TOTALS:	81.7	12.9	54,395

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	68.30
d) Fax Include per page fee charged.	
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.	0
f) In-house Reproduction Services Exclusive of overhead charges.	0
g) Outside Reproduction Services Including scanning services.	0
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	0
i) Court Reporting Transcripts.	
j) Travel Mileage, tolls, airfare, parking.	
k) Courier & Express Carriers Overnight and personal delivery.	10.95
l) Postage	
m) Other (specify)	
DISBURSEMENTS TOTAL:	79.25

I certify under penalty of perjury that the above is true.

Date: October 24, 2025

/s/ Kenneth A. Rosen
Signature

rev. 10/1/15

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0	0	0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0	0	0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and brining accounting current.	0	0	0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0	0	0.00
v) Valuation Appraise or review appraisals of assets.	0	0	0.00
w) Travel Time	0	0	0.00
SERVICE TOTALS:	81.7	12.9	54,395

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d) Fax Include per page fee charged.	
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.	0
f) In-house Reproduction Services Exclusive of overhead charges.	0
g) Outside Reproduction Services Including scanning services.	0
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	0
i) Court Reporting Transcripts.	
j) Travel Mileage, tolls, airfare, parking.	
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l) Postage	
m) Other (specify)	
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Date: October 24, 2025

/s/ Kenneth A. Rosen
Signature

rev. 10/1/15

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1	
KEN ROSEN ADVISORS PC Kenneth A. Rosen 80 Central Park West New York, New York 10023 Telephone: (973) 493-4955 Email: ken@kenrosenadvisors.com <i>Proposed Counsel to Debtor and Debtor-in-Possession</i>	
In re: CBRM Realty, Inc., et al. Debtors.	

Chapter 11

Case No. 25-15343 (MBK)

ORDER GRANTING ALLOWANCES

The relief set forth on the following pages, numbered two (2), is hereby ORDERED.

(Page 2)

Debtor: CBRM Realty, Inc., et al.
Case No. 25-15343 (MBK)
Caption of Order: ORDER APPROVING FEES

The Court having found that the person(s) named below filed application(s) for allowances; and notice and opportunity for hearing were given to creditors and other parties in interest as required; and for good cause shown; it is

ORDERED that compensation and expenses are allowed as follows:

APPLICANT: Ken Rosen PC

FEES \$ 54,395.00

EXPENSES \$ 79.25

Hon. Chief Judge Michael B. Kaplan, U.S.B.J.

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1	
KEN ROSEN ADVISORS PC Kenneth A. Rosen 80 Central Park West New York, New York 10023 Telephone: (973) 493-4955 Email: ken@kenrosenadvisors.com <i>Proposed Counsel to Debtor and</i> <i>Debtor-in-Possession</i>	
In re: CBRM Realty Inc., et al., Debtor. ¹	Chapter 11 Case No. 25-15343 (MBK)

FIRST AND FINAL FEE APPLICATION OF KEN ROSEN ADVISORS PC

Ken Rosen Advisors PC (“KAR”) as counsel for CBRM Realty, Inc., et al. (the “Debtors”), hereby submits this first and final fee application for compensation of professional services rendered and reimbursement of actual and necessary expenses (the “Application”) pursuant to (i) sections 327, 328, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”) and (ii) rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”),

¹ 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), 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.

This application is for professional services rendered by KAR for the period commencing May 19, 2025 through and including October 23, 2025, 2025 (the “Compensation Period”), and for reimbursement of its actual and necessary expenses incurred during the Compensation Period.

In support of this Application, KAR respectfully represents as follows:

BACKGROUND

1. On May 19, 2025, the above-captioned Debtors each filed voluntary petitions for relief under chapter 11 in the United States Bankruptcy Court for the District of New Jersey.
2. The Debtors' cases were jointly administered pursuant to rule 1015(b) of the Federal Rules of Bankruptcy Procedure [Docket No. 51].
3. On June 27, 2025 the Debtor was authorized to retain Ken Rosen Advisors PC as its counsel [Docket Number 224].
4. On September 5, 2025 the Debtors' Amended Chapter 11 Plan of Reorganization was confirmed by the Court. [Docket Number 525].

INFORMATION REQUIRED BY THE GUIDELINES

A. The Scope of the Application

5. Consistent with the guidelines, KAR discloses the following concerning the scope of the Application:

Name of Applicant	Ken Rosen Advisors PC
Name of Client Debtors in Possession	CBRM Realty Inc.
Petition Date	May 19, 2025
Retention Date	Order signed June 27, 2025 [Docket No. 224].
Date of Order Approving Employment	June 27, 2025. A true copy of the Retention Order is attached as Exhibit A.
Time Period Covered by Application	May 19, 2025 – October 23, 2025
Terms and Conditions of Employment	Hourly Interim
Interim/Final	Final
11 U.S.C. § 330	KAR seeks compensation under 11 U.S.C. § 330

Total Compensation (Fees) Sought this Period	54,395.00
Total Expenses Sought this Period	79.25
Total compensation approved by interim order to date	0
Total expenses approved by interim order to date	0
Blended rate in this application for all attorneys	650.00
Blended rate in this application for all timekeepers including paralegals	Only one attorney worked on this matter at the rate of \$650.00 per hour (81.7 hours). Paralegal rate is \$100.00 per hour. (12.9 hours).
Compensation sought in this application already paid pursuant to a monthly compensation order but not yet allowed	0
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed	0
If applicable, number of professionals and paraprofessionals in this application not included in staffing plan approved by client:	One professional and one paralegal
Number of professionals billing fewer than 15 hours to the case during this period:	Paralegal billed 12.9 hours
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this application using the rates originally disclosed in the retention application	No

B. Customary and Comparable Compensation

6. KAR's hourly rate for all timekeepers during the Compensation Period was \$650.00.

C. Statement from the Applicant

7. Consistent with the Guidelines, KAR answers the following questions:

Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services	No
--	----

Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices?	No
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information?	No
Does the fee application includes any rate increases?	None

**SUMMARY OF PROFESSIONAL SERVICES RENDERED
AND EXPENSES INCURRED**

8. KAR seeks allowance of compensation of professional services rendered to the Debtor during the Compensation Period in the amount of \$54,395.00. In addition, KAR seeks approval for reimbursement of expenses incurred in connection with the rendition of its services in the aggregate amount of \$79.25.

9. During the Compensation Period, KAR attorneys and paraprofessionals expended a total of 94.6 hours for which compensation is requested. The fees charged by KAR in this proceeding are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period.

10. The following summary highlights the major areas in which KAR rendered services during the Compensation Period. The summary is organized by project category. A summary chart setting forth the number of hours spent and the amount of compensation requested for each project category is attached as Exhibit B and a summary chart setting forth the amount of expenses requested by KAR in this Application is attached as Exhibit C. The full breadth of KAR 's services performed for the period May 19, 2025 through and including October 23, 2025 is reflected in the time records.

11. As described in more detail below, during the Compensation Period KAR advised the Debtor on a broad range of issues, including but not limited to a motion to dismiss the case, complying with the U.S. Trustee's request and general administration.

12. With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

13. Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

- a) The Time and Labor Required. The professional services rendered by KAR on behalf of the Debtor required the expenditure of substantial time and effort, as well as a high degree of professional competence and expertise, in order to deal with the many issues encountered by the Debtors in these cases with skill and dispatch. KAR respectfully represents that the services rendered by it were performed efficiently, effectively and economically.
- b) The Novelty and Difficulty of Questions. Although the issues in this case were not particularly novel, some legal challenges arose in the course of these cases. KAR's effective assistance has facilitated the resolution of such issues.
- c) The Skill Required to Perform the Legal Services Properly. KAR believes that its recognized expertise in the areas of insolvency proceedings and reorganization contributed to the efficient and effective representation of the Debtor in the Chapter 11 Case.
- d) The Preclusion of Other Employment by Applicant Due to Acceptance of the Case. KAR's representation of the Debtor did not preclude its acceptance of new clients.
- e) The Customary Fee. The fee sought herein is based on KAR's normal hourly rates for services of this kind. KAR respectfully submits that the hourly rates of its professionals are below market by at least 50%.
- f) Whether the Fee is Fixed or Contingent. Not applicable.
- g) Time Limitations Imposed by Client or other Circumstances. Not applicable.
- h) The Amount Involved and Results Obtained. KAR respectfully submits that the amount of fees for which compensation is sought is reasonable under the circumstances.

- i) *The Experience, Reputation and Ability of the Attorneys.* KAR is a professional corporation with one attorney that practice extensively in the fields of bankruptcy and corporate restructuring; KAR has represented debtors, creditors, creditors' committees, fiduciaries and numerous other parties in hundreds of cases before the United States Bankruptcy Court for the District of New Jersey as well as in various other Bankruptcy Courts throughout the country.
- (j) *The Undesirability of the Case.* Not applicable.
- (k) *Nature and Length of Professional Relationship.* Not applicable.
- (l) *Awards In Similar Cases.* The fees sought herein are commensurate with fees KAR has been awarded in other Chapter 11 Cases.

14. CBRM Interim and Final DIP financing orders referencing professional fee carveout are found at:

- Final DIP financing order is docket entry number 251 dated 07/02/25;
- Interim DIP order is docket entry number 110 dated 06/05/25;
- DIP budget is attached to Interim DIP order at pages 86 and 87;
- Professional fee carveout language is on page 27 of Interim DIP order;
- Professional fees are referenced in the budget attached to the Interim DIP order;
- DIP term sheet is on pages 62 - 83 of Interim DIP order;
- Escrow account for professional fees is referenced on page 66 of Interim DIP order.

WHEREFORE, KAR respectfully requests a final fee allowance as bankruptcy counsel for the Debtors in the amount of \$54,395.00, together with reimbursement of expenses in the amount of \$79.25, for a total final fee award of \$54,474.25.

DATED: October 24, 2025

Respectfully submitted,

KEN ROSEN ADVISORS PC

By: /s/ Kenneth A. Rosen
Kenneth A. Rosen

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
May 19, 2025	Emails with bankruptcy court and J. Naughton re: new filing						0.2
	Emails with bankruptcy court re: first day hearing dates						0.2
	Review bankruptcy petitions for filing						0.3
May 20, 2025	Emails with Schwartz re: creditor committee counsel						
	Emails with R. Malone re: creditor committee counsel						
	Review automatic dismissal motion filed by Clerk of bankruptcy clerk						0.1
	Emails with J. Sponder re: heads up on filing						0.1
	Review emails from Peshe responding to Sponder on first days						0.1
	Review joint administration order						0.3
	Review 3 Notices of Appearance from White and Case						0.1
	Review application for complex case designation						0.1
	Review notice of chapter 11 case						0.1
	Review motion to file consolidates schedules						0.2
	Review joint administration motion						0.2
	Telephone call with A. Rosen re: East West Bank DIP						
	Review email re: approved depository						0.1
	Review Notice of Appearance filed by M. Pompeo						0.1
	Review Notice of Appearance filed by J. Millar						0.1
	Review application to set first day hearings						0.3
May 21, 2025	Review email from J. Sponder re: inquiry on first day motions						0.1
	Review order shortening time for Tuesday						0.1
	Review Peshe response re: motions for Tuesday						0.1
	Review notice of Status Conference						0.1
	Review email re: potential buyers			0.1			
	Review emails re: not signing joint administration order yet and to contact the Court						0.2
	Review email from Court re: joint administration order						0.1

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
May 22, 2025	Telephone call from Gibbons re: chasing the creditors committee						
	Review motion to extend time to file schedules					0.3	
	Review revised joint administration order					0.1	
	Review service notice for Tuesday's hearings					0.1	
	Review Bankwell's Notice of Appearance					0.1	
	Review pro hac vice motions filed by White and Case					0.2	
	Review Notice of Appearance filed by Frumkin					0.1	
	Review two additional Notices of Appearance filed by Frumkin					0.2	
	Emails from Court re: Zoom hearing on Tuesday					0.2	
	Review Notice of Appearance filed by Leigh					0.1	
	Review email from J. Sponder with comments to first day motions						
						0.2	
	Attention to first day motions per J. Sponder comments					0.4	
	Review cash management motion				0.3		
May 23, 2025	Review Notice of Appearance filed by A. Sherman #32					0.1	
	Review 2019 filed by Millar					0.2	
	Review Notice of Appearance filed by Spano #33					0.1	
	Review business practices motion				0.4		
May 25, 2025	Telephone call with G. Pesche re: DIP financing motions						
	Telephone call with J. DiPasquale re: representation of creditors committee						
	Emails with Court re: contested DIP hearings						
May 26, 2025	Emails from R. Earle re: hearings tomorrow					0.1	
	Review email from J. Sponder asking about revisions					0.1	

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
	Emails with J. Sponder re: proposed edits to case management order				0.4		
	Emails with White & Case re: everything to be heard on Tuesday					0.1	
	Review email from Peshe to J. Sponder re: bank accounts				0.1		
	Review email from Peshe re: 35 day extension					0.1	
	Emails re: 4 hearings on Tuesday					0.1	
	Review email from Lingle re: Tuesday hearings					0.1	
	Review email from J. Sonder re: closing old accounts				0.1		
	Review email from J. Sponder and Peshe re: time to open				0.1		
	Review emails from R. Earle re: everything scheduled for Tuesday					0.1	
	Review email from J. Sponder confirming settlement					0.1	
	Review emails from Lingle re: changes acceptable					0.1	
	Review email from J. Sponder re: comments on joint administration complex order					0.2	
	Review Cleveland Notice of Appearance					0.1	
	Review email from J. Sponder re: 10 days case procedures					0.1	
	Review first day declaration					0.6	
May 27, 2025	Review Notice of Agenda					0.1	
	Review motion to expedite					0.1	
	Review motion to retain Kurtzman						
	Review DIP term sheet						
	Review J. Sponder's Epiq redlines						
	Review Capuzzi Notice of Appearance					0.1	
	Review notice of filing revised orders					0.1	
	Review J. Sponder's letter to the Court re: case management order				0.1		
	Review notice of submission of 3 orders					0.2	
	Review order shortening time					0.1	
	Review email from J. Sponder re: combined motions					0.2	
	Review Notice of Appearance filed by B. Goodman					0.1	

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
	Review Dundon first day affidavit						0.5
	Review notice of revised order filing re: status						0.1
	Review revised proposed order re: cash management				0.2		
	Attend first day hearings						0.7
	Review Lingle email re: delayed orders						0.1
	Review R. Earle email re: cash management order and delayed submissions						0.1
May 28, 2025	Review four orders from Tuesday hearings						0.3
	Review Lapene Notice of Appearance						0.1
	Review R. Earle confirmation email						0.1
	Review complex case order as well as Tuesday's other orders						0.2
	Review scheduling order						0.1
	Review DIP financing motion and exhibits						
May 29, 2025	Emails with G. Peshe re: contested DIP or not						
	Review email from Antonoff re: DIP						
	Review email from G. Peshe to Antonoff re: DIP						
	Review email from J. Sponder re: referrals to bank				0.1		
	Emails with J. Sponder re: concern about fees to bank				0.2		
	Telephone call with White & Case re: J. Sponder's questions on referral fees						
	Email to White and Case re: questions on referral fees						
	Review email from Lingle re: no conflicts of Verita						
	Review order shortening time re: DIP						
	Review motion to expedite DIP hearing						
	Review Notice of DIP hearing						
	Review email from JG. Peshe re: changing banks				0.1		
	Review master service list						0.1

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
May 30, 2025	Review and respond to email from J. Sponder re: Veritz (.1); telephone call with J. Sponder re: same (.2)						
	Review email from Antonoff re: NOLA (.1); review White & Case email re: NOLA (.1)						
	Review email from G. Peshe re: choice of banks and claims agents				0.1		
	Review IDI email scheduling request					0.1	
	Review email from J. Sponder re: Verita order						
	Review email from G. Peshe to J. Sponder re: DIP objections						
	Review email from J. Sponder re: DIP order						
	Review forms of DIP order from G. Peshe and J. Sponder						
	Review email from J. Sponder re: DIP projections						
	Review additional email from G. Peshe re: DIP hearing going forward on Monday						
	Review email from J. Sponder re: contested hearing on Monday						
	Review email from G. Peshe re: only legal arguments						
	Review email from G. Peshe re: getting budgets filed					0.1	
	Review email from J. Sponder re: sources and use					0.1	
	Review email from G. Peshe re: Verita language in DIP motion						
	June 1, 2025	Review order re: amended Verita order					
Review filed DIP facility exhibits							
Review email from Antonoff re: issues with DIP							
Review email from Antonoff re: proposed DIP settlement suggestions							
Review exhibit to DIP facility							
Review proposed deletion of Verita order							
Review J. Sponder's redline to DIP order							
Review email from G. Peshe to J. Sponder re: issues with DIP lenders							

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
June 2, 2025	Telephone call with G. Peshe re: proceeding with DIP today					0.1	
	Review Antonoff's email saying no to DIP						
	Review G. Peshe's settlement offer to Antonoff						
	Review Antonoff's dismissal motion						
	Review G. Peshe's email to J. Sponder re: his DIP questions						
	Review G. Pesche's email to J. Sponder re: DIP questions						
	Review hearing agenda					0.1	
	Review email from J. Sponder re: how hearing will proceed					0.1	
	Review revised Kurtzman order						
	Review notice re: revised NOLA DIP exhibits						
	Review notice re: revised Kelly DIP exhibits						
	Review email re: IDI					0.1	
	Review email from R. Earle re: hearing to dismiss						
	Revise retention order (.4); revise certification (.4); revise application (.3); revise retention letter (.3)						
	Email retention papers to J. Sponder for review						
	Attend second day hearings					1	
	Attend day 2 of DIP hearings						
	Review KCC retention order						
	Review notice of status conference					0.1	
June 3, 2025	Participate in creditor committee conference call with J. Sponder						
	Review hearing notice for June 17					0.1	
	Review order on tenant reimbursement				0.1		
	Telephone call with Judge Kaplan's chambers re: submitting on order					0.1	
	Review email from G. Peshe to J. Sponder re: challenge language						
	Telephone call with Hirshhorn re: procedural questions						
	Review email from J. Sponder re: possible creditor committee members						

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
	Review U.S. Trustee email re: IDI						0.1
	Review two emails re: setting date for IDI						0.1
	Telephone call with Hames re: advisor						
June 4, 2025	Review emails to resolve DIP order between Antonoff and G. Peshe						
	Review emails from Kava re: proposed final DIP order						
June 5, 2025	Review email from Kava re: final sign off on DIP						
June 11, 2025	Review complex case order						0.1
	Review email re: confidentiality order						
	Review confidentiality order						
June 12, 2025	Review text entry re: 6/26/2025 hearing						0.1
	Review order shortening time						0.1
	Review proposed utility order				0.2		
	Review email re: CIF cash collateral order						
	Review application to shorten time re: utility motion				0.1		
	Review full utility motion				0.3		
	Review Antonoff's comments on DIP order						
	Review J. Sponder's comments on payments order				0.1		
	Review email from J. Sponder re: pre-petition payments				0.1		
	Review Spano's objection to certain DIP payments						
	Review motion to shorten time re: bar date				,1		
	Review bar date motion						0.3
	Review email from Lingle re: open bank accounts						0.1
	Review motion to assume contracts						0.3
June 13, 2025	Review order shortening time re: bar date						0.1
	Review email from U.S. Trustee re: follow up questions						0.1

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
June 16, 2025	Review Stipulation concerning revised NOLA terms						
	Review witness and exhibit list for 6.17.2025					0.5	
	Review revised Kutzman order						
	Review Dundon certification for hearing on 6/17						
	Review Notice of Appearance filed by W. Dolan					0.1	
	Review email from Hilco						
	Review email from Lingle re: Kurtzman disclosures						
	Telephone call with HUD re: why they received notice (.1); review email from HUD (.1)						
	Review agent for 6.17.2025 hearing					0.1	
	Review email exchange with Antonoff re: NDA						
June 17, 2025	Review updated agenda					0.1	
	Attend 2nd day hearing					0.6	
June 18, 2025	Conference call with USA/HUD						
	Review and respond to email inquiry from M. Byrne					0.1	
	Review final DIP order submitted by K. Hamilton						
	Review objection to DIP filed by CIT						
	Review CIF's certification in objection to DIP						
	Review signed orders re: cash management and consolidation of creditors list				0.2		
	Review email with assorted orders					0.2	
	Review email from J. Sponder re: redlines						
June 19, 2025	Review White and Case retention papers						
	Review KRA retention papers as edited						
	Review certification in opposition to dismissal						

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
June 23, 2025	Review Statements and Schedules					0.8	
	Work with Clerk's office and White & Case re: filing Statements and Schedules					0.3	
	Review responses from U.S. Trustee questions from IDI					0.3	
June 24, 2025	Review J. Sponder's comments on KRA retention papers and work on answers and edits						
	Review Gittleson declaration filed by DH1						
	Review Notice of Agenda for 6.26.2025 hearings					0.1	
	Review Hilco email re: proposal						
	Review debtor's witness and exhibit list						
	Exchange emails with J. Sponder re: extension of time, revised retention order and edits						
June 25, 2025	Review debtors reply to get DIP financing over Cleveland IF lender						
	Review Lingle Affidavit with attachments in support of DIP financing						
	Review email re: insurance				0.1		
	Review LaPuma declaration re: White and Case retention						
June 26, 2025	Review email re: not agreeing to bar date revisions					0.1	
	Review filed revised bar date order					0.1	
	Review amended witness list and exhibits						
	Review emails re: complex case procedures					0.2	
June 27, 2025	Review G. Peshe's supplemental affidavit for retention						
June 29, 2025	Emails with J. Sponder re: bar date order					0.1	
June 30, 2025	Review Plan of Reorganization and Disclosure Statement						
	Review monthly operating reports					0.4	

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
	Review amended Lake Wind petition Review final DIP order					0.1	
July 1, 2025	Review notice of 341 meeting Review joint Plan of Reorganization and Disclosure Statement for debtors					0.1	
July 2, 2025	Review Dundon retention application Review amended schedules Review and respond to inquiry from M. Byrne					0.2 0.2	
July 3, 2025	Review email re: Summit		0.1				
July 8, 2025	Review emails re: more time for U.S. Trustee on Dundon application Review application to shorten time re: ordinary course professionals Review application re: employing ordinary course professionals						
	Review Lingle email re: who will testify at 341 Review documents re: adding Federal Tax IDs					0.1 0.1	
July 9, 20205	Attend 341 meeting Review text order re: utility hearing Review Bielskie email re: who will testify Review order re: timing of administrative fee order Review motion for administrative fee order				0.1	2 0.1 0.1 0.2	
July 11, 2025	Review motion re: bidding procedures		0.3				
July 13, 2025	Review email from J. Sponder re: limiting the role of Dundon						

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
	Review emails between Dundon, Peshe and Sponder re: Dundon as financial advisors						
July 14, 2025	Review Peshe declaration in support of retention Review order shortening time re: Disclosure Statement approval						
July 18, 2025	Review Spano complaint Review J. Sponder's redline re: ordinary course professionals						
July 21, 2025	Review series of monthly operating reports Review J. Sponder and Lingle emails re: Dundon retention Review Sherman's objection to Plan of Reorganization Review Silber motion for subpoena				0.2		
July 22, 2025	Review Antonoff withdrawal Review ordinary course professionals declaration						
July 24, 2025	Attend hearing on Plan of Reorganization and Disclosure Statement						
July 25, 2025	Review Hilco retention application						
July 26, 2025	Review newly filed exhibits re: Hilco Review application to employ Schneider						
July 28, 2025	Review Notice of Sale Review contract assumption notice		0.1				0.1

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
	Review email from J. Sponder re: answers to Island/Dundon retention						
July 29, 2025	Review long email from J. Sponder re: Hilco retention						
July 30, 2025	Review notices re: revised Plan and Disclosure Statement						
July 31, 2025	Review Stipulation with Spano Review notice re: adjournment of 2004 hearing					0.1	
August 1, 2025	Review motion to appoint equity committee Review order conditionally approving disclosure statement Review motion to approve bidding procedures for NOLA		0.3				
August 4, 2025	Review long email re: retention of L&A Review email re: Hilco retention Review hearing notice re: confirmation						
August 5, 2025	Review list of changes to Disclosure Statement						
August 6, 2025	Review revised Hilco retention order Review email from J. Sponder re: L&A retention						
August 7, 2025	Review declarations re: Hilco and L&A						
August 13, 2025	Review motion to extend challenge period Review email from AFCO credit Review witness list and exhibit list re: 8.14.2025 hearing Review email from Rivers re: NOLA Review Notice of Agenda		0.1			0.1	

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
	Review J. Sponder's email re: L&A retention						
August 14, 2025	Attend hearing on sale motion		0.2				
	Review monthly fee statement of White & Case						
	Review email from J. Sponder re: Hilco retention						
	PARA: Review and organize time in preparation for drafting fee application						
August 15, 2025	Review motion to extend removal time					0.3	
	Review long email from AFCO re: insurance				0.2		
	Review emails with US DOJ re: HUD infor request						
	Review order approving bidding procedures		0.1				
August 15, 2025	PARA: Draft spreadsheet for fee application						
	PARA: Draft fee application cover sheet (.3); draft certification in support of fee application (.4); draft proposeddc order (.3)						
August 17, 2025	Review motion to approve Disclosure Statement and motion to shorten time re: approval of Disclosure Statement						
	Review application to apply orders					0.1	
	Review J. Sponder's comments re: Laguna on applying					0.1	
	Review witness and exhibits list of 21st						
August 18, 2025	Review witness and exhibit list for 8.21.2025 hearing					0.1	
	Review email from J. Sponder re: addition to Laguna order					0.1	
	Review Laguna first days					0.2	
	Review proposed Disclosure Statement						

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
August 19, 2025	Review White and Case monthly fee statement Review email from Rivero re: need for conference brief and draft email to R. Earl Review emails with J. Sponder and Lingle re: Laguna extnension Review email from R. Earl re: Silber attending hearing Respond to tenant texts and phone calls in area code 504 Review Earle email re: Silber appearance Review Lingle responses on Laguna applying Review Rivero email re: need for confirmation briefs Review monthly fee application byWhite & Case for June		0.3			0.2 0.1	
August 20, 2025	Review email to J. Sponder re: Kaminsky Review notrice re: ordinary course professionals Respond to tenant texts and phone calls in area code 504 Review email from G. Peshe re: bondholders trustee Review supplement re: ordinary course professionals Review declarations of ordinary course professionals		0.1			0.1	
August 21, 2025	Attend Court hearing via Zoom Review Monthly Operating Reports filed by the Debtor Review retnetion application of Sedler Review assumption and assignments notice				0.1	0.3	
August 22, 2025	Review signed Hilco order Review notice of possible contract assumption Review supplemental declaration of White and Case retention Review G.Pesche supplemental declaration				0.1		
August 23, 2025	Respond to supplemental declaration by K. Rosen						

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
August 24, 2025	Review supplemental declaration of Veritas Review supplemental declaration of Scheder re: retention Review supplemental declaration of Hilco Review email from J. Sponder re: objections to confirmation Review response to confirmation issues Review email from J. Sponder re: Plan of Reorganization confirmation Telephone call with D. Kamansky						
August 25, 2025	Review emails from J. Sponder and D. Pesce re: objection resolution to Kamsky Review email from J. Sponder re: extension of time to object to Joint Plan of Reorganization Review email re: extension of time to vacate complaint Review revised motion to apply orders to Laugna Review emails re: stay violation with Rothbard					0.2	
August 26, 2025	Telephone call with D. Kamensky re: trustee Review objection to KH by Bacon and also motion to certify class Review order re: schedules Review order re: retention of Hilco Review objection to sale of Kelly Hamilton Review Plan of Reorganization objection by Bacon Review objection to sale of Kelly Hamilton Review draft of Plan of Reorganization			0.3 0.3			
August 27, 2025	PARA: Attention to updating time charges for fee application Review further responses re: Plan of Reorganization from J. Sponder						

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
	Review Millar declaration re: Kamansky						
August 28, 2025	Review email from Lingle re: waivers in the Plan of Reorganziation Review J. Sponder's email re: resolving Plan of Reorganization issues						
	Review U.S. Trustee objections to Plan of Reorganization						
August 29, 2025	Review revised Plan of Reorngaization for KH revisions Review Proof of Claim notice Review witness list for 9.24.2025 matter Review further comments from J. Sponder re: Kelly H. Plan of Reorganization						0.2
September 1, 2025	Review J. Sponder's email re: Ad Hoc's fees						
September 2, 2025	Email with R. Earle re: witness depositions room Email to G. Peshe re: conduct of Plan of Reorganization hearing						
September 3, 2025	Draft email re: resolving Pittsburg objections to Plan of Reorganization						
September 4, 2025	Attend conference and sale hearing 2d 1/2 of hearing re: Disclosure Statement approval Review liquidation analysis for Crown Reivew memo in support of confirmaiton			1			
September 5, 2025	Review objection to assumption by Ostrowski Review order denying equity committee Review order re: removal times			0.2		0.1 0.1	

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
September 8, 2025	Review email from J. Sponder re: M Group Review email from J. Sponder re: S. Modi Review notice re: Dundon retention by Laguna Review confirmation hearing notice for 10.22.2025		0.1				
September 9, 2025	PARA: Further attention to updating time charges for fee application						
September 10, 2025	Review declaration of S. Gardner Review notice of serving subpoena Review email from Mentz re: their bid for property Review notice of extension of bid deadline		0.1 0.1				
September 12, 2025	PARA: Attention to fee application Review email re: \$987,000 bid deposit		0.1				
September 15, 2025	Review email from Fofanova re: client settlement Review Williams email re: deposit on bid		0.1				
September 16, 2025	Review motion to extend exclusivity						
September 17, 2025	Review court order re: objection to Silber claims Review monthly fee statement from White and Case						0.1
September 18, 2025	Review KCC invoice						
September 19, 2025	Review text order re: no hearing on 9.22.2025					0.1	
September 24, 2025	Review US Trustee email re: quarterly fees					0.1	

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
September 25, 2025	Review series of Monthly Operating Reports				0.3		
	Review motion to transfer Silber case					0.4	
	Review motion to stay Silber proceedings					0.4	
September 26, 2025	Review order shortening time re: Silber motion					0.1	
September 27, 2025	PARA: Attention to fee application						
September 30, 2025	PARA: Attention to fee application Review Plan of Reorganization supplement						
October 1, 2025	Review stipulation re: venue transfer Review White and Case monthly fee statement					0.2	
October 3, 2025	Review motion re: adequate protection for AFCO Review docket notice re: exigencies				0.2	0.1	
October 6, 2025	Review notice re: executive contracts removal		0.1				
October 7, 2025	Review notice of venue transfer to NJ Review stipulation with Faegre re: Proof of Claim						0.3
October 8, 2025	Review notice of 10/22/2025 conference hearing Review new plan supplment						
October 9, 2025	Review objection to final DIP order by Pittsburgh						
October 14, 2025	Review email from J. Sponder re: Plan of Reorganization objection Review AFCO stipulation Review Plan of Reorganization objection by New Orleans server				0.2		

Date	Narrative	Asset Analysis and Recovery	Asset Disposition	Avoidance Action Litigation	Business Operations	Case Administration	Claims Administration and
October 18, 2025	Review revised Plan of Reorganization for changes Review two declarations and memorandum of law for confirmation hearing Look at witness list and exhibit list for 10.23.2025 Review proposed confirmation order Review revised Plan						
October 19, 2025	Review agenda for conference hearing Review witness and exhibit list for conference hearing Review draft confirmation order						
October 20, 2025	Review agenda for 10/23 conference						
October 22, 2025	PARA: Attention to fee application Review objection to confirmation from OSL Review Estrada declaration						
October 23, 2025	Review order approving disclosure statement and solicitation Review supplement to Plan of Reorganization Review Monthly Operating Report PARA: Finalize fee application				0.2		
	TOTALS:	0	4.1	0	5.2	25.3	0.6
			Atty hours	81.7			

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
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0.1
0.1

0.1

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
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0.2

0.3

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0.2

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
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Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
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1.4

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Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
	0.3										
			0.2								
	0.1										
			0.1								
			0.1								
			0.7								
			0.1								
			0.1								
			0.1								
			0.1								
	0.1										
	0.1										
			0.5								
			0.1								
			0.1								
			0.3								
	0.1										
			0.4								
			0.4								

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
			0.1								
			0.2								
				0.6							
			0.1								
			0.1								
	0.2										
			0.2								
			0.2								
				0.1							
	1.4										
	0.1										
			0.4								
	0.1										
					0.1						
			0.1								
			0.1								
					0.1						

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
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0.1

0.3

0.1

0.1

0.2

0.1

0.1

0.1

0.3

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
			0.2								
	0.1		0.3								
	0.1										
	0.1										
			0.2								
			0.1								
			0.4								
			0.1								
			0.3								
			0.2								
	0.3										
	0.3										
	0.2										
				0.6							

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
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0.1

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0.4

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2.4

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
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0.2

0.6

0.3

0.1

0.1

0.2

0.1

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
	0.2										
	0.2										
						0.1					
				0.2							
					0.4						
						0.1					
	0.2										
	0.1										
						0.1					
						0.2					
	0.1										
	0.3										
	0.3										
			0.2								
			0.1								
				0.3							

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
	0.2										
		0.3									
	0.1										
	1										
			0.2								
	4										
	1										
							0.2				
				0.1							
							0.2				

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
	0.1										
	0.1										
	0.1										
						0.2					
						0.1					
						0.2					
						0.3					
						0.2					
						0.1					
				0.1							
				0.2							
						0.4					
	0.4										
	0.1										
	0.1										
						0.3					
						0.4					
	1										
						0.3					

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
						0.3					
						0.1					
						0.1					
						0.2					
						0.2					
						0.1					
						0.2					
	0.1										
						0.1					
						0.1					
						0.2					
						0.2					
						0.3					
						0.3					

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
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0.1

0.1

0.2

1

0.1

0.1

0.3

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0.3

0.2

0.1

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
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0.4

2.4

0.3

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0.1

0.1

0.2

0.2

0.2

0.1

Employee Benefits / Pensions	Fee/Employment Applications	Fee/Employment Objections	Financing	Litigation	Meeting of Creditors	Plan and Disc Stmt	Relief from Stay Proceedings	Accounting / Auditing	Corporate Finance	Data Analysis	Litigation Consulting
						0.2					
						0.6					
						0.1					
						0.2					
						0.2					
						0.1					
						0.1					
						0.2					
						0.1					
	0.8										
						0.2					
						0.1					
						0.2					
						0.2					
	1										
0	25.1	0.6	14.3	3.4	1.2	14.3	0	0.5	0	0	0

Reconstruction
Accounting

Tax Issues

Valuation

Travel

Reconstruction
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