

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF NEW JERSEY**

**ATTORNEY MONTHLY FEE STATEMENT COVER
SHEET FOR THE PERIOD OCTOBER 1, 2025 THROUGH OCTOBER 23, 2025¹**

CBRM Realty Inc., *et al.*²

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

¹ A portion of the expenses requested herein predate October 1, 2025.

² 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.



<p style="text-align: center;">SECTION I <u>FEE SUMMARY</u></p>

Summary of Amounts Requested for the Period
October 1, 2025 through October 23, 2025 (the “**Compensation Period**”)

Fee Total	\$248,486.00
Disbursement Totals	\$18,676.73
Total Fees Plus Disbursements	\$267,162.73

Summary of Amounts Requested for Previous Records¹

Total Previous Fees and Expenses Requested	\$5,824,308.49
Total Fees and Expenses Allowed to Date	\$0.00
Total Retainer Remaining	\$0.00
Total Holdback	\$2,533,684.64
Total Received by Applicant	\$2,576,260.19

¹ Not all amounts approved under the Admin Fee Order [Docket No. 324] have been paid to White & Case. As of the date hereof, fees and expenses of \$4,096,099.63 have been approved under the Admin Fee Order, fees and expenses of \$2,576,260.19 have been paid to White & Case, and fees and expenses of \$2,533,684.64 remain unpaid following approval under the Admin Fee Order due to a lack of available funding.

Name	Title	Year Admitted	Department	Hours	Rate	Fees
Aquije, Alonso	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	26.7	\$1,110.00	\$29,637.00
Curtis, Lucas	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	3.4	\$1,280.00	\$4,352.00
Giovine, Peter	Associate	2023	Financial Restructuring & Insolvency (FRI) Practice	14.3	\$990.00	\$14,157.00
Gu, Cynthia	Associate	2024	Real Estate Practice	7.3	\$870.00	\$6,351.00
Hershey, Samuel	Partner	2013	Financial Restructuring & Insolvency (FRI) Practice	1.5	\$1,790.00	\$2,685.00
Hirshorn, Deanna	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	18.5	\$490.00	\$9,065.00
Kava, Sam	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	81.1	\$1,280.00	\$103,808.00
Lingle, Barrett	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	33.0	\$1,370.00	\$45,210.00
Ludovici, Stephen	Staff Attorney	2014	Financial Restructuring & Insolvency (FRI) Practice	4.5	\$1,110.00	\$4,995.00
Pesce, Gregory	Partner	2011	Financial Restructuring & Insolvency (FRI) Practice	1.7	\$2,100.00	\$3,570.00
Pezza, David	Partner	1985	Real Estate Practice	4.5	\$2,100.00	\$9,450.00
Rivero, Devin	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	7.1	\$1,280.00	\$9,088.00
Rosenberg, Erin	Partner	2012	Financial Restructuring & Insolvency (FRI) Practice	0.1	\$1,790.00	\$179.00
Venes, Aileen	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	5.0	\$490.00	\$2,450.00
Walz, Jacko	Associate	2025	Financial Restructuring & Insolvency (FRI) Practice	1.4	\$870.00	\$1,218.00
Wick, Katie	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	1.0	\$490.00	\$490.00
Yoo, Jade	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	1.3	\$1,370.00	\$1,781.00
Grand Total				212.4	\$1,096.27	\$248,486.00

SECTION II
SUMMARY OF SERVICES

Matter Number	Services Rendered	Hours	Fees
B02	Automatic Stay Issues	0.1	\$179.00
B04	Vendors, Taxes, Insurance and Business Operations Issues	4.9	\$5,461.00
B05	Case Administration	3.1	\$1,519.00
B07	Claims Administration & Objections	0.8	\$578.00
B12	Executory Contracts & Unexpired Leases	0.9	\$1,050.00
B13	Hearings & Court Matters	6.3	\$8,927.00
B14	Litigation & Discovery	9.2	\$9,108.00
B16	Professional Retention & Fees – W&C	7.9	\$8,289.00
B18	Reports, Schedules & U.S. Trustee Issues	4.7	\$5,465.00
B19	Development of Claims and Causes of Action	8.5	\$9,201.00
B20	Asset Sales: NOLA	12.6	\$16,767.00
B21	Exclusivity, Plan & Disclosure Statement: NOLA	153.4	\$181,942.00
Grand Total		212.4	\$248,486.00

SECTION III
SUMMARY OF DISBURSEMENTS

Disbursements	Amount
Airfare	\$887.87
Computer Services	\$26.00
Conference Room Dining	\$64.24
Court Costs	\$118.40
Document Research	\$905.85
E-Discovery Data Hosting / Storage	\$77.74
Express Mail	\$88.27
Filing Fees	\$534.00
Overtime Meals	\$61.26
Search Fee	\$9,739.75
Taxi - Business	\$5,723.94
Travel Meals	\$449.41
Grand Total	\$18,676.73

SECTION IV
CASE HISTORY

- (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:¹
 - (a) With respect to the NOLA Debtors, the Applicant reviewed, revised, and negotiated a successive iteration of the NOLA Debtors' chapter 11 plan [Docket No. 622]; revised the proposed order confirming the plan [Docket No. 623]; prepared a memorandum of law in support of confirmation [Docket No. 618]; prepared supplements to the plan [Docket Nos. 603, 647]; reviewed and responded to objections to the plan [Docket Nos. 609, 614, 648]; prepared declarations in support of confirmation [Docket Nos. 617, 619, 632]; and otherwise continued to prepare for the hearing on confirmation of the Plan (which hearing occurred on October 22, 2025).
 - (b) The Applicant attended and participated in the confirmation hearing held October 22, 2025.
 - (c) The Applicant tended to other matters concerning administration of the chapter 11 cases.
 - (d) The Applicant rendered all other services set forth on the invoices attached hereto as **Exhibit B**.²
- (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*

¹ 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.

² The invoice attached hereto as **Exhibit B** contains detailed descriptions of the services rendered by the Applicant, including during the Compensation Period.

Capital Holdings LLC and Certain of its Debtor Affiliates [Docket No. 622]
(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: The Plans have been confirmed. This is the fifth monthly fee statement. Distributions to creditors will be made in accordance with the Plans.

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
Caption in Compliance with D.N.J. LBR 9004-1

WHITE & CASE LLP

Gregory F. Pesce (admitted *pro hac vice*)
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Chicago, Illinois 60606
Telephone: (312) 881-5400
Email: gregory.pesce@whitecase.com

-and-

Andrew Zatz
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Proposed Counsel to Debtors and Debtors-in-Possession

KEN ROSEN ADVISORS PC

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Email: ken@kenrosenadvisors.com

Proposed Co-Counsel to Debtors and Debtors-in-Possession

In re:

CBRM REALTY INC., *et al.*

Debtors.¹

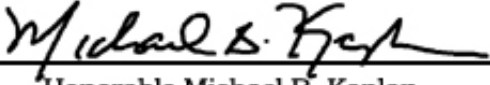
Chapter 11

Case No. 25-15343 (MBK)
(Jointly Administered)

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

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

DATED: June 27, 2025


Honorable Michael B. Kaplan
United States Bankruptcy Judge

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 (1 Hamilton Apts MM LLC (0765), RH Chenault Creek LLC (8987), RH Coj (6963), RH Windrun LLC (0122), RH New Orleans Holdings LLC (7528), and RH Ne 2515343250627000000000002
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

Upon the application (the “**Application**”)¹ 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

¹ 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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AS OF THE PETITION DATE

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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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.*
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AS OF THE PETITION DATE

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.*

Case No. 25-15343 (MBK)

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OF WHITE & CASE LLP AS DEBTORS' COUNSEL, EFFECTIVE
AS OF THE PETITION DATE

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 23 October 2025

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Automatic Stay Issues				
5 October 2025	Review and forward notices of state court filings.	E Rosenberg	0.10	179.00
SUBTOTAL: Automatic Stay Issues			0.10	179.00

Vendors, Taxes, Insurance and Business Operations Issues

1 October 2025	Review and revise application in lieu of motion (0.5); email B. Lingle re: application in lieu of motion for AFCO stipulation (0.1).	S Kava	0.60	768.00
2 October 2025	Finalize application in lieu of motion for approval of stipulation.	J Walz	1.20	1,044.00
3 October 2025	Call with T. Rizvi re: utility (0.2); call with utility company re: postpetition ordinary course payments (0.5).	S Kava	0.70	896.00
3 October 2025	Finalize application in lieu of motion for approval of stipulation.	J Walz	0.20	174.00
3 October 2025	Assist team with e-filing of Application in Lieu of Motion in Support of Entry of Stipulation and Agreed Order Granting AFCO Credit Corporation Adequate Protection, Relief from Automatic Stay, and Requested Relief (0.1); confirm filing with team and coordinate service with Verita (0.1); update pleadings file (0.1).	A Venes	0.30	147.00
7 October 2025	Call with utility company (0.2); review plan provisions and email B. Lingle issues from utility (0.7); email G. Pesce re: same (0.2); revise AFCO stipulation and agreed order (0.2).	S Kava	1.30	1,664.00
8 October 2025	Email chambers re: AFCO.	S Kava	0.10	128.00
13 October 2025	Email chambers re: AFCO stipulation.	S Kava	0.10	128.00
15 October 2025	Email T. Rizvi re: AFCO stipulation (0.1); review same (0.1); call with T. Rizvi re: same (0.1); call AFCO re: payment (0.1).	S Kava	0.40	512.00
SUBTOTAL: Vendors, Taxes, Insurance and Business Operations Issues			4.90	5,461.00

Case Administration

2 October 2025	Update main case pleadings file.	A Venes	0.10	49.00
8 October 2025	Coordinate document execution meeting for G. Pesce.	K Wick	0.30	147.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
9 October 2025	Review recent filings in case; update pleadings file.	A Venes	0.10	49.00
10 October 2025	Review recent filings; update pleadings file.	A Venes	0.10	49.00
13 October 2025	Update court filings folder and case calendar (0.3); pull filing receipts for B. Lingle (0.4).	K Wick	0.70	343.00
17 October 2025	Update pleadings file.	Hirshorn, Deanna	0.50	245.00
21 October 2025	Email Chambers speaking line request for G. Pesce, B. Lingle, S. Hershey and J. Yoo as well as witness for upcoming Confirmation hearing (0.1); update pleadings file (0.4); update case calendar (0.2).	Hirshorn, Deanna	0.70	343.00
22 October 2025	Update pleadings filing (0.1) email J&J Court Reporting for hearing transcript of today's hearing (0.1); review and respond to Verita re: service of MORs (0.1).	Hirshorn, Deanna	0.30	147.00
23 October 2025	Update transcript file with NOLA confirmation hearing (0.1); circulate transcript to W&C team (0.1); update pleadings file (0.1).	Hirshorn, Deanna	0.30	147.00
SUBTOTAL: Case Administration			3.10	1,519.00

Claims Administration & Objections

7 October 2025	Review and finalize stipulation between debtors and Faegre Drinker re: certain proofs of claim (0.2); review and respond to emails with A. Aquije, G. Pesce, and B. Lingle re: same (0.1); file same (0.1); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	0.50	245.00
8 October 2025	Call with claimant counsel re: claim stipulation (0.2); finalize notes re: same (0.1).	A Aquije	0.30	333.00
SUBTOTAL: Claims Administration & Objections			0.80	578.00

Executory Contracts & Unexpired Leases

14 October 2025	Correspond with objector re: cure objection.	D Rivero	0.30	384.00
15 October 2025	Draft schedule of executory contracts and unexpired leases.	A Aquije	0.60	666.00
SUBTOTAL: Executory Contracts & Unexpired Leases			0.90	1,050.00

Hearings & Court Matters

20 October 2025	Pull and email Kelly Hamilton Confirmation Transcript to B. Lingle (0.1); review and respond to emails with G. Pesce, S. Kava, B. Lingle and T. Rizvi re: upcoming confirmation hearing (0.1); telephone call with S. Kava re: upcoming filing of notice (0.1); prepare notice of virtual hearing for NOLA Confirmation hearing (0.4);	Hirshorn, Deanna	0.90	441.00
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Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	finalize and file same (0.1); coordinate service with Verita (0.1).			
21 October 2025	Prepare for NOLA confirmation hearing.	B Lingle	0.30	411.00
22 October 2025	Confirmation hearing.	G Pesce	1.70	3,570.00
22 October 2025	Participate in NOLA confirmation hearing.	B Lingle	1.70	2,329.00
22 October 2025	Attend virtual hearing (1.1); call with ID re: same (0.6).	S Kava	1.70	2,176.00
SUBTOTAL: Hearings & Court Matters			6.30	8,927.00

Litigation & Discovery

5 October 2025	Draft letter re: removal and appointment of manager for Country Club Manor (1.4); docket research re: current status and default judgment in Copper and Magnolia Property Owner LLC v. Copper Ridge Apts LLC et al. (La. 2024) (1.3).	P Giovine	2.70	2,673.00
6 October 2025	Draft Notice of Suggestion of Pendency of Bankruptcy and Automatic Stay of Proceedings for Federal National Mortgage Association v. Homewood House Apts LLC, No. GD-25-001428.	P Giovine	0.80	792.00
7 October 2025	Draft Notice of Suggestion of Pendency of Bankruptcy and Automatic Stay of Proceedings for Federal National Mortgage Association v. Homewood House Apts LLC, No. GD-25-001428 (1.3); legal research re: state civil procedure rules and procedural requirements for Allegheny County filing (1.8); prepare service list for service of indication of bankruptcy (0.8); draft service cover letters to accompany indication of bankruptcy (0.6); call with D. Hirshorn re: filing of indication of bankruptcy (0.1); research and draft chart noting docket information re: actions pending where will file indications of bankruptcy (1.1).	P Giovine	5.70	5,643.00
SUBTOTAL: Litigation & Discovery			9.20	9,108.00

Professional Retention & Fees – W&C

1 October 2025	Revise August monthly fee statement (0.7); revise August monthly fee statement (0.3); draft escrow letter re: October LaPuma fees (0.2).	S Ludovici	1.20	1,332.00
1 October 2025	Assist with preparing for filing W&C August fee statement (0.1); draft CNO and payment authorization letter re: July monthly fee statement per S. Ludovici (0.3); e-file August fee statement (0.1).	A Venes	0.50	245.00
2 October 2025	Revise escrow letters and CNO (0.3); email with W&C team re: fee entry (0.1); revise and finalize escrow letters (0.7).	S Ludovici	1.10	1,221.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 October 2025	Finalize and e-file CNO re: July monthly fee statement of W&C (0.2); correspond with S. Ludovici re: same (0.1).	A Venes	0.30	147.00
3 October 2025	Reconcile escrow amounts.	S Ludovici	0.10	111.00
7 October 2025	Analyze new debtor filing impact on fee application process (0.5); chat with S. Kava re: same (0.2); call with S. Kava re: same (0.3); draft email to B. Lingle and L. Baccash re: same (0.6).	S Ludovici	1.60	1,776.00
8 October 2025	Review September pro forma re: correct task code allocation (1.0); draft summary email to S. Ludovici re: same (0.2).	A Aquije	1.20	1,332.00
8 October 2025	Review and respond to email from S. Ludovici re: W&C retention application.	Hirshorn, Deanna	0.10	49.00
9 October 2025	Review September pro forma re: classification of time codes.	A Aquije	0.20	222.00
13 October 2025	Review September pro forma.	B Lingle	0.30	411.00
14 October 2025	Revise pro forma re: corrected time groups.	A Aquije	0.80	888.00
20 October 2025	Review September proforma.	S Ludovici	0.20	222.00
23 October 2025	For NOLA Debtors, review pro forma time entries or expense entries for September monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	0.30	333.00
SUBTOTAL: Professional Retention & Fees – W&C			7.90	8,289.00

Reports, Schedules & U.S. Trustee Issues

21 October 2025	Review, revise September MORs.	B Lingle	0.90	1,233.00
21 October 2025	Review MORs (1.2); review and draft detailed entries for certain payments to professionals (0.5); call with B. Lingle re: same (0.2); email correspondences with ID team (0.3); call with ID re: same (0.1); further review MORS (0.5); coordinate filing of MORs (0.2).	S Kava	3.00	3,840.00
21 October 2025	Review MORs for further redactions ahead of submission (0.4); assist team with e-filing of MORs (0.3); confirm filings with team (0.1).	A Venes	0.80	392.00
SUBTOTAL: Reports, Schedules & U.S. Trustee Issues			4.70	5,465.00

Development of Claims and Causes of Action

1 October 2025	Review and revise stay stipulations in NY and NJ (0.9); correspond with team and counsel to Silber re: same (0.6).	S Hershey	1.50	2,685.00
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Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
1 October 2025	Confer with S. Hershey re: stay Silber bankruptcy (0.1); draft correspondence re: same (0.5); revise same (1.1); continue revising same (0.6); continue revising same (1.1).	L Curtis	3.40	4,352.00
1 October 2025	Assist team with finalizing for and e-filing of various documents in M. Silber and CBRM cases dockets (1.1); confirm filings with team (0.1); coordinate service with Verita (0.1); update pleadings files (0.1).	A Venes	1.40	686.00
2 October 2025	Draft certificate of service re: Silber chapter 7 stipulation (0.5); emails with legal assistant and mailroom re: service and filing (0.3).	P Giovine	0.80	792.00
2 October 2025	Review and respond to P. Giovine email request for assistance with coordinating mail service to M. Silber and his counsel of documents recently filed in M. Silber chapter 7 case and CBRM chapter 11 case (0.1); create mailing labels (0.8); coordinate print and mail service with NY Copy Center and Mailroom (0.1).	A Venes	1.00	490.00
3 October 2025	Review and respond to email from P. Giovine re: filing of certificate of service of documents recently filed in M. Silber case (0.1); update and e-file certificate of service (0.1); confirm filing with P. Giovine and update pleadings file (0.1); download, save, and send copy of POC 1 by NY Dept. of Taxation against M. Silber to G. Pesce (0.1).	A Venes	0.40	196.00
SUBTOTAL: Development of Claims and Causes of Action			8.50	9,201.00

Asset Sales: NOLA

3 October 2025	Review and comment on DH1 sale agreement.	D Pezza	1.50	3,150.00
8 October 2025	Review of NOLA title commitments.	D Pezza	0.40	840.00
10 October 2025	Review of title commitments and executed Lynd purchase agreement.	D Pezza	0.60	1,260.00
10 October 2025	Review title commitments and confer with R. Gaertner re: same.	C Gu	1.10	957.00
14 October 2025	Research Louisiana real estate transfer taxes and reply to inquiry (0.4); prepare NOLA asset purchase agreement exhibits (0.3).	D Pezza	0.70	1,470.00
15 October 2025	Draft exhibits to asset purchase agreement.	A Aquije	0.50	555.00
15 October 2025	Revise PSA exhibits (1.1); confer with D. Pezza and R. Gaertner re: same (0.4); confer with title re: proformas and form of deed (0.1).	C Gu	1.60	1,392.00
16 October 2025	Revise PSA exhibits (0.5); confer with R. Gaertner re: same (0.2); correspond with title re: proformas and form of deed (0.1).	C Gu	0.80	696.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
17 October 2025	Revise PSA exhibits (1.3); correspond with R. Gaertner and D. Pezza re: same (0.3); correspond with title re: proformas and form of deed (0.2).	C Gu	1.80	1,566.00
20 October 2025	Correspond with title re: form of deed (0.3); confer with R. Gaertner and D. Pezza and revise exhibits (0.7).	C Gu	1.00	870.00
21 October 2025	Review of NOLA purchase agreement exhibits in advance of court filing.	D Pezza	0.80	1,680.00
21 October 2025	Confer with R. Gaertner and D. Pezza re: exhibits (0.3); correspond with D. Pezza re: title commitments and violations (0.2).	C Gu	0.50	435.00
22 October 2025	Discuss title clearance for NOLA purchase with C. Gu (0.4); correspondence to client re: code violations (0.1).	D Pezza	0.50	1,050.00
22 October 2025	Confer with D. Pezza re: title commitments and violations.	C Gu	0.50	435.00
23 October 2025	Telephone conference with D. Pezza re: NOLA APA.	B Lingle	0.30	411.00
SUBTOTAL: Asset Sales: NOLA			12.60	16,767.00

Exclusivity, Plan & Disclosure Statement: NOLA

6 October 2025	Review plan (0.3); email utility re: treatment (0.1).	S Kava	0.40	512.00
6 October 2025	Draft notice of revised plan supplement (0.1); finalize rejection notice (0.4); coordinate service re: same (0.1).	A Aquije	0.60	666.00
6 October 2025	Review and respond to email from A. Aquije re: NOLA Removal Assumption Notice (0.2); finalize and file NOLA Removal Assumption Notice (0.2).	Hirshorn, Deanna	0.40	196.00
7 October 2025	Amend NOLA plan.	B Lingle	1.50	2,055.00
8 October 2025	Revise NOLA plan.	B Lingle	0.20	274.00
8 October 2025	Call with L. Hoffman re: NOLA purchase (0.2); email utility company re: plan (0.2).	S Kava	0.40	512.00
9 October 2025	Review and draft confirmation brief.	S Kava	6.00	7,680.00
9 October 2025	Draft confirmation declaration for NOLA debtors.	A Aquije	1.00	1,110.00
10 October 2025	Analyze voting results (0.8); prepare for NOLA confirmation (2.2).	B Lingle	3.00	4,110.00
10 October 2025	Review objection filed by SWBNO (0.4); review plan terms re: same (0.3); review voting report (0.2); correspondences with B. Lingle re: same (0.2); correspondences with A. Aquije re: declaration (0.2);	S Kava	7.70	9,856.00

Crown Capital Holdings LLC
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OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	review and revise confirmation brief (4.4); draft Dundon declaration (1.0); draft Verita declaration (1.0).			
10 October 2025	Draft confirmation declaration.	A Aquije	1.80	1,998.00
11 October 2025	Draft confirmation declaration.	A Aquije	1.00	1,110.00
12 October 2025	Draft declaration in support of confirmation.	A Aquije	1.00	1,110.00
13 October 2025	Revise NOLA plan (0.3); telephone conference with S. Kava re: NOLA confirmation (0.5); review voting results (0.3); draft NOLA confirmation order (1.2); telephone conference with W&C team re: NOLA confirmation brief and declaration (0.5).	B Lingle	2.80	3,836.00
13 October 2025	All with A. Aquije re: confirmation brief, declarations, and order (0.1); call with B. Lingle re: same (0.6); outline response to SWBNO objection (1.3); call with D. Rivero, B. Lingle, A. Aquije re: response to SWBNO objection and confirmation (0.7); draft response to SWBNO (2.6); email D. Rivero re: same (0.1); call B. Lingle re: votes (0.2); review Verita voting tabulation (0.5).	S Kava	6.10	7,808.00
13 October 2025	Correspond with W&C re: confirmation brief (0.4); review plan objection (0.3); emails with W&C re: plan objection (0.2); review confirmation brief (0.5).	D Rivero	1.40	1,792.00
13 October 2025	Draft confirmation brief (2.0); call with W&C team re: same (0.7).	A Aquije	2.70	2,997.00
13 October 2025	Zoom with W&C team re: confirmation brief (0.6); research re: business judgment rule at confirmation and rejection of contracts (0.4).	P Giovine	1.00	990.00
14 October 2025	Revise NOLA plan (1.4); review, revise NOLA confirmation brief (0.4); telephone conference with S. Hershey re: NOLA confirmation and Crown financing issues (0.2); telephone conference with L. Hoffman re: plan (0.5).	B Lingle	2.50	3,425.00
14 October 2025	Email D. Hirshorn re: confirmation brief (0.1); call with A. Aquije re: confirmation brief and declaration (0.2); email D. Pezza re: plan supplement (0.1); review and revise confirmation brief (2.3); email Verita re: NOLA Voting Report and Declaration (0.1); further review and revise confirmation brief (2.5); email A. Aquije comments to Dundon declaration (0.3); call with T. Rizvi re: plan confirmation and next steps (0.8); email B. Lingle re: confirmation brief (0.1).	S Kava	6.50	8,320.00
14 October 2025	Review and revise confirmation brief for NOLA re: NOLA sale (2.8); review and revise declaration for same (0.5).	D Rivero	3.30	4,224.00
14 October 2025	Draft declaration in support of confirmation (2.7); call with S. Kava re: confirmation brief (0.1); further revise confirmation declaration, incorporating comments from	A Aquije	4.50	4,995.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	D. Rivero (1.7).			
14 October 2025	Research re: business judgment rule at confirmation and rejection of contracts (1.2); legal research re: hearing in contested matter (0.7); draft confirmation brief section re: Sewerage & Water Board of New Orleans objection (1.4).	P Giovine	3.30	3,267.00
15 October 2025	Review, revise NOLA confirmation brief and plan.	B Lingle	2.40	3,288.00
15 October 2025	Call A. Aquije re: confirmation brief and declaration (0.1); revise and draft confirmation brief (2.7); call A. Aquije re: same (0.2); review US Trustee objection (0.6); review and revise brief re: same (0.8); review and revise plan supplement (0.7); email real estate team re: same (0.1); email P. Giovine and L. Curtis re: witness & exhibit list for confirmation (0.1); further revise confirmation brief and declarations (3.8); email B. Lingle re: same (0.1).	S Kava	9.20	11,776.00
15 October 2025	Review and revise confirmation brief for NOLA re: NOLA sale (1.1); review and revise declaration for same (0.4).	D Rivero	1.50	1,920.00
15 October 2025	Revise confirmation brief, incorporating comments from S. Kava (0.8); research for D. Rivero re: same (2.2); call with S. Kava re: same (0.1); further revise confirmation declaration, incorporating comments from D. Rivero and S. Kava (0.8); review U.S. Trustee objection (0.3); call with S. Kava re: confirmation documents (0.2).	A Aquije	4.40	4,884.00
15 October 2025	Begin redacting assumption notice for A. Aquije and S. Kava.	Hirshorn, Deanna	0.50	245.00
16 October 2025	Revise NOLA plan (2.4); review, revise NOLA confirmation brief (0.5).	B Lingle	2.90	3,973.00
16 October 2025	Attend call with L. Curtis re: confirmation hearing.	J Yoo	0.40	548.00
16 October 2025	Review and revise Dundon declaration (1.0); email Dundon team re: same (0.1); review plan revisions (1.0); revise and further draft confirmation brief and declaration re: same (1.6); email B. Lingle re: same (0.1); email correspondences with S. Landgraber and T. Rizvi re: declaration (0.3); further revise declaration re: comments from same (0.5); revise voting declaration (0.6); email litigation team re: witness and exhibit list (0.1); call with S. Landgraber and T. Rizvi re: Dundon declaration (0.5); call with Andres re: voting tabulation (0.2); email Verita voting declaration (0.1); call with ClF re: same (0.1); call with D. Rivero re: next steps to confirmation filing (0.3); revise confirmation brief, declarations and order (2.0); email B. Lingle re: same (0.1).	S Kava	8.60	11,008.00
16 October 2025	Correspond with W&C re: confirmation brief for NOLA re: NOLA sale (0.3); review and revise same (0.3).	D Rivero	0.60	768.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 October 2025	Call with S. Kava re: confirmation brief (0.1); further revise same (0.4); revise confirmation declaration (0.5); draft notice re: revised documents (0.4).	A Aquije	1.40	1,554.00
16 October 2025	Redact NOLA assumption list (0.8); review and revise tables of authorities in confirmation brief (1.9).	Hirshorn, Deanna	2.70	1,323.00
17 October 2025	Revise plan, brief and declaration and conference with G. Pesce re: same.	B Lingle	4.80	6,576.00
17 October 2025	Confer with W&C team re: confirmation hearing (0.3); review Dundon declaration and confer with W&C team re: same (0.5).	J Yoo	0.80	1,096.00
17 October 2025	Email M. Dundon re: declaration (0.1); further revise brief, Dundon declaration, voting declaration, and Order (2.3); email G. Pesce re: same (0.1); review voting data (0.3); email Verita re: same (0.1); call with Verita re: same (0.2); revise brief (0.4); email J. Yoo re: same (0.1); call with J. Yoo (0.2); email D. Hirshorn re: filings (0.1); email B. Lingle re: same (0.1); review and revise brief and declarations (1.7); email G. Pesce (0.1); review objections (0.6); email G. Pesce re: outstanding comments and points (0.2); review settlement terms (0.4); revise docs re: comments from G. Pesce and L. Hoffman (0.4); call with Verita (0.2); email follow up re: tabulation (0.1); coordinate final APA for plan supplement with Real Estate team (0.5); email Verita re: exhibits and revised declaration (0.3); review Verita declaration (0.1); review comments to plan from G. Pesce (0.3); calls with A. Aquije re: same (0.4); review revised plan (0.3).	S Kava	9.60	12,288.00
17 October 2025	Revise confirmation brief and declaration (1.0); multiple calls with S. Kava re: same (0.2); further revise confirmation brief, incorporating comments from S. Kava (0.8); further revise NOLA Plan, incorporating comments from G. Pesce (0.9).	A Aquije	2.90	3,219.00
17 October 2025	Prepare for upcoming filings of confirmation brief, Dundon declaration and revised plan (0.6); review and finalize confirmation brief (0.7); file same (0.1) review, finalize and file Dundon declaration (0.2); coordinate service with Verita re: same (0.1); draft witness and exhibit list for Crown Confirmation Hearing (1.4); draft agenda for Crown Confirmation Hearing (0.5); review and finalize voting declaration in preparation for filing (0.2); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	3.90	1,911.00
18 October 2025	Correspond with W&C team and coordinate filing of amended NOLA plan and confirmation order.	B Lingle	0.80	1,096.00
18 October 2025	Review and revise confirmation order (2.0); email B. Lingle re: same (0.1); email A. Aquije re: notice of revise plan, plan, and redline (0.1); call with B. Lingle re: revised plan (0.2); revise plan re: comments from G. Pesce (0.3); call with A. Aquije re: same (0.1); coordinate filing of revised plan and confirmation order (0.2); call with D. Hirshorn re: same (0.3).	S Kava	3.30	4,224.00

Crown Capital Holdings LLC
RE: Project Legal Services

OUR REF: 1906527-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 October 2025	Further revise plan and notice re: same (0.3); compile and prepare revised plan for filing (0.6).	A Aquije	0.90	999.00
18 October 2025	Pull and organize exhibits for NOLA Confirmation hearing (3.4); confer with P. Giovine re: same (0.4); finalize and file witness and exhibit list with exhibits for upcoming confirmation hearing (1.5).	Hirshorn, Deanna	5.30	2,597.00
19 October 2025	Review notice of agenda (0.5); review plan revisions, proposed order, W&E list, and plan supplement in preparation for confirmation hearing (3.0); correspondences with Dundon (0.2).	S Kava	3.70	4,736.00
19 October 2025	Finalize and file agenda for upcoming confirmation hearing (NOLA plan) (0.2); coordinate service with Verita of same (0.1).	Hirshorn, Deanna	0.30	147.00
20 October 2025	Prepare for NOLA confirmation hearing (0.4); review, revise NOLA confirmation hearing notice (0.3).	B Lingle	0.70	959.00
20 October 2025	Email A. Rovitz re: plan effective date (0.1); correspondence with D. Hirshorn re: hearing notice and updated filings (0.3); review plan supplement and APA (1.3); revise hearing notice (0.3); draft supplemental declaration (1.0); call with A. Estrada re: same (0.1); review exhibits to declaration (0.1); review order and plan on file (1.3); attention to email research re: plan support (1.0).	S Kava	5.50	7,040.00
20 October 2025	Continue to redact Assumption list for A. Aquije and S. Kava.	Hirshorn, Deanna	0.70	343.00
21 October 2025	Telephone conference with counsel to OSL re: NOLA plan (0.4); review, revise supplemental voting report (1.3); telephone conference with J. Millar re: potential confirmation objection (0.2); telephone conferences with G. Pesce and J. Millar re: NOLA confirmation and potential objection (0.4); correspond with counsel to OSL re: same (0.2).	B Lingle	2.50	3,425.00
21 October 2025	Confer with W&C team re: confirmation hearing.	J Yoo	0.10	137.00
21 October 2025	Revise voting declaration (0.2); email Verita re: same (0.1); call with Verita re: same (0.1); review plan supplement (1.3); email C. Gu and D. Pezza re: same (0.1); email L. Hoffman re: plan supplement (0.1); coordinate filing of voting declaration (0.2); correspondence with Cole Schotz re: hearing plan (0.5).	S Kava	2.60	3,328.00
21 October 2025	Review, revise plan supplement.	A Aquije	0.30	333.00
21 October 2025	Finalize redactions to NOLA assumption list (0.6); review and finalize voting declaration (0.1); file same (0.1); coordinate service with Verita of same (0.1).	Hirshorn, Deanna	0.90	441.00
22 October 2025	Prepare for NOLA confirmation hearing (2.7); revise NOLA confirmation order (2.2).	B Lingle	4.90	6,713.00

Crown Capital Holdings LLC
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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
22 October 2025	Email L. Hoffman re: plan supplement (0.1); call with L. Hoffman re: same (0.3); review bid procedures order, DS order, plan re: plan supplement terms (0.8); email B. Lingle re: same (0.2); research re: confirmation requirements (0.5); email B. Lingle re: same (0.1); review OSL objection (0.3); research re: breakup fee (0.6); review order (0.3); research re: appeal and email B. Lingle re: same (0.4).	S Kava	3.60	4,608.00
22 October 2025	Research re: confirmation objection.	A Aquije	0.60	666.00
22 October 2025	Review and finalize Third Notice of Filing Plan Supplement (0.2); confer with B. Lingle re: same (0.1); file same (0.1); coordinate service of same with Verita (0.1).	Hirshorn, Deanna	0.50	245.00
23 October 2025	Correspond with parties in interest and submit confirmation order.	B Lingle	0.50	685.00
SUBTOTAL: Exclusivity, Plan & Disclosure Statement: NOLA			153.40	181,942.00
TOTAL			212.40	248,486.00