

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

ATTORNEY FEE APPLICATION COVER SHEET
FOR THE PERIOD APRIL 29, 2025 THROUGH OCTOBER 31, 2025

In re CCA Construction, Inc.
Case No. 24-22548 (CMG)
Chapter 11

Applicant: McDermott Will & Schulte LLP
Client: Todd Harrison, as the Examiner
Case Filed: December 22, 2024

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

RETENTION ORDER ATTACHED.

/s/ Darren Azman March 16, 2026
DARREN AZMAN Date



242254826031600000000001

**SECTION I
FEE SUMMARY**

First and Final Application Covering the
Period April 29, 2025 through October 31, 2025:

FEE TOTALS	\$1,111,216 ¹
DISBURSEMENTS TOTALS	\$0 ²
TOTAL FEE APPLICATION REQUEST	\$500,000

	<u>FEEES</u>	<u>EXPENSES</u>
TOTAL PREVIOUS FEES REQUESTED:	\$0	\$0
TOTAL FEES ALLOWED TO DATE:	\$0	\$0
TOTAL RETAINER REMAINING:	\$0	\$0
TOTAL HOLDBACK (IF APPLICABLE):	\$0	\$0
TOTAL RECEIVED BY APPLICANT:	\$0	\$0

**SECTION II
CASE HISTORY**

- (1) Date case filed: December 22, 2024
- (2) Chapter under which case commenced: Chapter 11
- (3) Date of retention: May 31, 2025, effective as of April 29, 2025. *See **Exhibit B.***

If limit on number of hours or other limitations to retention, set forth: *See Docket Nos. 211, 351 & 431.*
- (4) Summarize in brief the benefits to the estate and attach supplements as needed: See narrative portion of fee application.
- (5) Anticipated distribution to creditors: Pursuant to the confirmed Plan & Disclosure Statement, the Plan provides for the payment in full of all Allowed Claims (or otherwise deem them Unimpaired).

¹ As further described in this Fee Application, although McDermott Will & Schulte accrued \$1,111,216 in fees, it is voluntarily agreeing to seek payment of only \$500,000 pursuant to the Scope and Budget Order.

² McDermott voluntarily wrote off all of its expenses incurred during the Chapter 11 Case.

- (a) Administration expense: 100% of claims.
 - (b) Secured creditors: Agreed resolution.
 - (c) Priority creditors: 100% of claims.
 - (d) General unsecured creditors: 100% of claims.
- (6) Final disposition of case and percentage of dividend paid to creditors (if applicable):
Final dividend percentages as provided for in the *Chapter 11 Plan of CCA Construction, Inc. (Technical Modifications)* [Docket No. 698, Ex. A].

MCDERMOTT WILL & SCHULTE LLP

Darren Azman (admitted *pro hac vice*)
Kristin K. Going (admitted *pro hac vice*)
Deanna D. Boll (NJ Bar No. 031861998)
Nathaniel Allard (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: (212) 547-5400
Facsimile: (212) 547-5444
dazman@mcdermottlaw.com
kgoing@mcdermottlaw.com
dboll@mcdermottlaw.com
nallard@mcdermottlaw.com

Counsel for Todd Harrison, Examiner

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

In re:

CCA Construction, Inc.,¹

Debtor.

(Hon. Christine M. Gravelle)

Chapter 11

Case No. 24-22548 (CMG)

**FIRST & FINAL APPLICATION OF
MCDERMOTT WILL & SCHULTE LLP AS COUNSEL TO THE
EXAMINER FOR ALLOWANCE OF COMPENSATION FOR THE PERIOD
FROM APRIL 29, 2025 THROUGH AND INCLUDING OCTOBER 31, 2025**

McDermott Will & Schulte LLP (the “Applicant” or “McDermott”), as counsel to Todd Harrison, as the examiner (the “Examiner”) appointed in the above-captioned chapter 11 case (the “Chapter 11 Case”) of CCA Construction, Inc. (the “Debtor”), hereby submits this *First & Final Application of McDermott Will & Schulte LLP as Counsel to the Examiner for Allowance of Compensation for the Period From April 29, 2025 Through and Including October 31, 2025* (the

¹ The last four digits of the Debtor’s federal tax identification number are 4862. The Debtor’s service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.

“Application”), for allowance of compensation for professional services rendered during the period from April 29, 2025, through and including October 31, 2025 (the “Compensation Period”). In support of the Application, McDermott submits the Declaration of Darren Azman, attached hereto as **Exhibit A** (the “Azman Declaration”). In further support of the Application, McDermott respectfully represents as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the District of New Jersey (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11*, entered July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The Examiner consents to the Court entering a final order in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 105(a), 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rules 2016-1 and 2016-4 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the “Local Rules”), and the Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases (the “Guidelines”).

Background

I. The Chapter 11 Case

4. On December 22, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the Court. The Debtor is operating its business and managing its property as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On February 11, 2026, the Court confirmed the Plan, and on February 13, 2026, the Debtor filed a notice that the Plan had gone effective [Docket No. 702].

II. Appointment of the Examiner

6. On January 23, 2025, BML Properties, Ltd. (“BMLP”) filed a motion seeking the appointment of an examiner pursuant to Bankruptcy Code section 1104(c) [Docket No. 88].

7. On March 5, 2025, the Court entered the *Order Granting the Appointment of an Examiner* [Docket No. 211] (the “Examiner Order”), pursuant to Bankruptcy Code section 1104(c). The Examiner Order indicated that the Examiner, upon his appointment, may retain professionals (including his professional services firm) if he determines that such retention is necessary to discharge his duties, with such retention to be subject to Court approval under standards equivalent to those set forth in Bankruptcy Code section 327. *See* Examiner Order at ¶ 5. The Examiner Order also provided that the Examiner and any professionals retained by the Examiner shall be compensated and reimbursed for their expenses upon application to the Court on notice to parties pursuant to Bankruptcy Code section 330. *Id.*

8. Thereafter, on April 29, 2025, per the Examiner Order, the U.S. Trustee filed the *Notice of Appointment of Examiner* [Docket No. 280] and the *Application for Order Approving*

Appointment of Examiner [Docket No. 281] seeking Court approval of the appointment of Todd Harrison as the Examiner.

9. The Court entered the *Order Approving the Appointment of a Chapter 11 Examiner by United States Trustee* [Docket No. 296], approving the appointment of Todd Harrison as the Examiner, on May 7, 2025, and scheduled a conference for May 22, 2025, to determine the scope and budget for the Examiner’s investigation (the “Scope Hearing”).

III. Scope of the Examiner

10. In advance of the Scope Hearing, the Examiner prepared and filed the *Examiner’s Statement Regarding Proposed Scope of Investigation*, describing his proposed scope [Docket No. 311]. The Debtor and BMLP also submitted briefing regarding the proposed scope and budget for the Examiner.²

11. Following the Scope Hearing, the Court entered the *Order Approving Examiner’s Scope and Budget for Investigation* on June 2, 2025 [Docket No. 351] (the “Scope and Budget Order”). The Scope and Budget Order stated as follows:

The fees and expenses of the Examiner and all professionals retained by the Examiner in connection with the Authorized Investigation shall not exceed \$100,000 in the aggregate (the “Budget”); *provided*, however, nothing herein shall preclude (i) the Special Committee and the Examiner from agreeing on additional funding for the Budget or (ii) the Examiner from seeking Court approval for an increase in the Budget, subject to the Special Committee’s and the Debtor’s right to oppose such relief.

See Docket No. 351 ¶5. Thus, the Scope and Budget Order specifically contemplated the parties could agree to increase the Examiner’s budget.

² See *Debtor’s Supplemental Brief in Connection with the Scope and Budget of the Authorized Investigation of the Examiner* [Docket No. 307]; *BML Properties, Ltd.’s Supplemental Brief in Support of the Appointment of Examiner* [Docket No. 309].

12. The Examiner was authorized to conduct an investigation focused on the scope and process of the Special Committee's³ ongoing internal investigation. The Examiner was permitted to provide recommendations regarding the methodology and breadth of the Special Committee's work, as well as input on potential topics and claims for consideration. After the Scope and Budget Order was entered, the Examiner and McDermott worked collaboratively with the other parties to pursue a diligent and robust investigation within the parameters set by the Court. Following good faith discussions with counsel to the Special Committee, the Examiner and the Special Committee agreed to increase the budget for the Authorized Investigation to \$500,000 as contemplated by the Scope and Budget Order. This agreement was formalized in a Stipulation and Consent Order approved by the Court on August 7, 2025 [Docket No. 431] (the "So Ordered Stipulation").

IV. Retention of McDermott

13. On May 22, the Examiner filed the *Examiner's Application for Order Authorizing Retention and Employment of McDermott Will & Emery LLP as Counsel to the Examiner, Effective as of April 29, 2025* [Docket No. 335] (the "Retention Application") with the Court for seeking entry of an order authorizing the Examiner to retain and employ McDermott as his counsel, effective as of April 29, 2025. On May 31, 2025, the Court entered an order [Docket No. 349] (the "Retention Order") authorizing such retention, attached hereto as **Exhibit B**.

14. The Examiner selected his own law firm, McDermott, because McDermott possesses extensive knowledge and expertise in the substantive areas of law relevant to the Chapter 11 Case and is well qualified to represent the Examiner in connection with the Chapter 11 Case.

³ Capitalized terms used but not otherwise defined in this Application shall have the meanings ascribed to them in the *Report of Todd Harrison, Court-Appointed Examiner* dated September 15, 2025 (the "Examiner Report"). The Examiner Report was originally filed under seal at Docket No. 481, pursuant to paragraphs 3 and 4 of the Scope and Budget Order. Following redactions to protect confidential and highly confidential information, the Examiner filed a redacted version of the Examiner Report on October 6, 2025, at Docket No. 504.

McDermott is a full-service firm with offices across the United States and Europe. McDermott's Business Restructuring Group is nationally recognized, and has substantial experience representing creditors, debtors, fiduciaries, unsecured creditors' committees and other parties in interest in numerous bankruptcy matters. McDermott also has a broad-based practice in other key areas of law relevant to the Chapter 11 Case.

15. Pursuant to the Examiner Order, the Examiner determined that McDermott's retention was necessary to fulfill his duties. Accordingly, McDermott's retention was well-founded in the context of the Chapter 11 Case.

V. Examiner Investigation

16. Pursuant to the Scope and Budget Order, the Examiner was tasked with evaluating the scope and process of the Special Committee Investigation, including offering recommendations and feedback regarding its methodology, breadth, and potential claims.

17. Upon appointment, the Examiner and McDermott reviewed extensive background materials related to the Chapter 11 Case, the Debtor, and its affiliates. The Examiner and McDermott also held multiple meetings with counsel for the Debtor and BMLP to understand their perspectives and discuss information-sharing protocols. Following these discussions, the Examiner and McDermott executed an acknowledgment and consent to the existing *Confidentiality Stipulation and Protective Order* [Docket No. 86].

18. The Examiner received informal document productions from Debtor's and BMLP's counsel prior to the Scope Hearing. After the Scope Hearing, the Examiner or McDermott, as counsel, attended all interviews to which they were invited as laid out in the Examiner Report. For interviews conducted prior to the Scope Hearing, the Examiner received notes prepared by Cole Schotz, co-counsel to the Debtor.

19. Throughout the investigation, the Examiner and McDermott engaged in regular communications with Cole Schotz. On July 25, 2025, Cole Schotz provided a working draft of the Special Committee report, which the Examiner reviewed and commented on. Cole Schotz incorporated or addressed this feedback before filing the Special Committee report on July 31, 2025.

20. The Examiner also reviewed additional documents provided by the Special Committee after the filing of the Special Committee’s report.

21. On September 15, 2025, the Examiner filed the Examiner Report, dated September 15, 2025, entirely under seal, pursuant to paragraphs 3 and 4 of the Scope and Budget Order and the procedures for filing a “Sealed Document” posted on the Court’s website [Docket No. 481]. Following redactions to protect confidential and highly confidential information, the Examiner filed a redacted version of the Examiner Report on October 6, 2025, at Docket No. 504.

22. The Examiner understands that following the filing of the Examiner Report, the Debtor and BMLP engaged in mediation which led to a consensual resolution which paved the way for the Plan to be confirmed.

Information Required by the Guidelines

A. The Scope of the Application

23. Consistent with the Guidelines, McDermott discloses the following concerning the scope of the Application:

Name of Applicant	McDermott Will & Schulte LLP
Name of Client	Todd Harrison, as the Examiner
Petition Date	December 22, 2024
Retention Date	Order signed May 31, 2025, effective April 29, 2025. <i>See</i> Retention Order at Docket No. 349, a copy of which is attached hereto as <u>Exhibit B.</u>
Time Period Covered by Application	April 29, 2025 – October 31, 2025

Terms and Conditions of Employment	Hourly
Interim / Final	Final Fee Application under 11 U.S.C. § 331
Date and Terms of Administrative Fee Order	On February 18, 2025, this Court entered the <i>Administrative Fee Order Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of This Court</i> , dated February 18, 2025 [Docket No. 178] (the “ <u>Interim Compensation Procedures Order</u> ”). Pursuant to the Interim Compensation Procedures Order, Professionals (as defined therein) can file monthly fee statements with the Court. If there are no objections to a monthly fee statement, Professionals are entitled to payment of eighty (80%) percent of the fees and one hundred (100%) percent of the expenses requested in their monthly fee statement. The Interim Compensation Procedures Order further provides that Professionals may file interim fee applications for allowance of compensation and reimbursement of expenses of the amount sought in their monthly fee statements, including the twenty percent (20%) holdback pursuant to Section 331 of the Bankruptcy Code at four-month intervals or such other intervals directed by the Court.
11 U.S.C. § 330	McDermott seeks compensation under 11 U.S.C. § 330.
Total Compensation (Fees) Sought this Period	\$500,000 ⁴
Total Expenses Sought this Period	\$0 ⁵
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	\$1,417
Blended Rate in This Application for All Timekeepers	\$1,364.96

⁴ As described in more detail herein, McDermott incurred fees of \$1,111,216. The fees requested consists of \$500,000 allocated for the Authorized Investigation pursuant to the Scope and Budget Order and So Ordered Stipulation. In other words, McDermott voluntarily wrote down over \$600,000 of its fees accrued in the Chapter 11 Case.

⁵ McDermott voluntarily wrote off all of its expenses incurred during the Chapter 11 Case.

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 in This Application Not Included in Staffing Plan Approved by Client	N/A
If Applicable, Difference Between Fees Budgeted and Compensation Sought for This Period	The amount requested herein is less than the amount McDermott and the Examiner budgeted set forth on Exhibit D-2 because, in addition to being subject to the Scope and Budget Order and So Ordered Stipulation, McDermott voluntarily wrote off over \$600,000 as described herein.
Number of Professionals Billing Fewer Than 15 Hours to the Case During This Period	5
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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

B. Summary of Timekeepers

24. With respect to each professional and paraprofessional who billed time to this matter during the Compensation Period, McDermott discloses the following information in **Exhibit E** attached hereto: (i) name; (ii) date of bar admission, if applicable; (iii) position; (iv) current hourly rate for the Chapter 11 Case; (v) total hours billed included in Compensation Period; and (vi) total compensation billed in this Compensation Period. No rate increases were implemented during the Compensation Period.

C. Customary and Comparable Compensation

25. McDermott’s hourly rates are established to fairly compensate the firm for the services of its attorneys and paraprofessionals, and to account for fixed and routine overhead expenses. As noted in the Retention Application, McDermott voluntarily applied a 10% discount

to its hourly rates as an accommodation to the Examiner. This discount is reflected in the time detail attached hereto as **Exhibit G**. Additionally, the Examiner agreed to further reduce his billing rate, resulting in a discounted rate of \$1,950 per hour.

26. As set forth in **Exhibit C**, McDermott’s blended hourly rate for all timekeepers providing services to the Examiner during the Compensation Period was \$1,364.96. For the convenience of the Court, **Exhibit C** sets forth McDermott’s blended hourly rate data for the preceding calendar year for other practice groups as compared to the fees sought in this Application for the Compensation Period.

D. Statement from the Applicant

27. Consistent with the Guidelines, McDermott answer the following questions:

<u>Question</u>	<u>Answer</u>
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period?	As disclosed in the Retention Application, McDermott agreed to a 10% discount to its standard hourly rates. In addition, the Examiner agreed to voluntarily further reduce his hourly billing rate to \$1,950.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	The total fees requested in this Application are not higher than by 10% or more of the total budgeted amount discussed with the Examiner as reflected on Exhibits D-1 and D-2 .
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?	Yes.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information?	Yes.
Does the fee application include any rate increases?	No.

E. Budget and Staffing Plan

28. In connection with serving as counsel to the Examiner and assisting with his investigation, McDermott and the Examiner discussed an efficient team and budget given the Scope and Budget Order and the So Ordered Stipulation. In accordance with the Guidelines, additional information regarding McDermott's budget and staffing plan for the Compensation Period is attached hereto as **Exhibits D-1** and **D-2**.

Disinterestedness of McDermott

29. To the best of the Examiner's knowledge and as disclosed in the *Declaration of Kristin K. Going in Support of the Examiner's Application for Order Authorizing Retention and Employment of McDermott Will & Emery LLP as Counsel to the Examiner, effective as of April 29, 2025* [Docket No. 335] and the *Supplemental Declaration of Kristin K. Going in Support of Examiner's Application for Entry of an Order Authorizing the Employment and Retention of McDermott Will & Emery LLP as Counsel to the Examiner, Effective as of April 29, 2025* [Docket No. 469] (the "Supplemental Declaration")⁶, (a) McDermott does not hold or represent any interest adverse to the interest of the Debtor's estate with respect to the matters on which McDermott is employed, (b) McDermott is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code, (c) McDermott does not represent any other entity having an adverse interest in connection with the Chapter 11 Case, except as permitted under section 1103(b) of the Bankruptcy Code, and (d) McDermott has no connection with the Debtor, its creditors, or any other party in interest, its attorneys and accountants, the U.S. Trustee, or any person employed in the office of the same, or any judge in the United States Bankruptcy Court for the District of New Jersey, except as disclosed or otherwise described in the Retention Application or the Supplemental Declaration.

⁶ As noted in the Supplemental Declaration, on August 1, 2025, McDermott Will & Emery LLP and Schulte Roth & Zabel LLP completed a merger to form McDermott Will & Schulte LLP.

30. McDermott performed the services for which it is seeking compensation on behalf of the Examiner, and not on behalf of any committee, creditor, or other entity.

Summary of Professional Services Rendered

31. During the Compensation Period, McDermott professionals, including attorneys and paraprofessionals (collectively, the “McDermott Professionals”), devoted 812.6 hours to, among other things, pre-investigation work, meeting and communications with parties in interest, investigation work and report preparation and drafting. McDermott Professionals’ most significant work in these matter categories is summarized below, and all work performed by McDermott Professionals in the Chapter 11 Case is described in the time detail attached hereto as **Exhibit G**.

A. Examiner Time
Amount Sought: \$241,020

32. This category includes all the time expended by Todd Harrison, the Examiner. During the Compensation Period, the Examiner devoted time to, among other things: (i) reviewing bankruptcy filings, transcripts, and background materials; (ii) planning and executing the Examiner’s investigation strategy; (iii) attending interviews and reviewing related documents; (iv) coordinating with Debtor and Special Committee professionals and parties in interest; and (v) preparing and revising the Examiner report and related pleadings.

33. The Examiner devoted a total of 123.6 hours to examiner related tasks during the Compensation Period, for which compensation in the amount of \$241,020 is sought.

B. Court Hearings
Amount Sought: \$54,863.50

34. During the Compensation Period, McDermott Professionals prepared for and attended the May 22 Scope Hearing regarding the determination of the scope of the Examiner’s investigation, as well as attending all subsequent relevant hearings.

35. McDermott Professionals devoted a total of 43.3 hours to preparation for and attendance at Court Hearings during the Compensation Period, for which compensation in the amount of in the amount of \$54,863.50 is sought.

**C. Report Preparation and Drafting
Amount Sought: \$137,367.50**

36. During the Compensation Period, McDermott Professionals devoted time to preparing and drafting the Examiner's report.

37. McDermott Professionals devoted a total of 102.4 hours to report preparation and drafting matters during the Compensation Period, for which compensation in the amount of \$137,367.50 is sought.

**D. Document Requests and Discovery
Amount Sought: \$64,714.50**

38. During the Compensation Period, McDermott Professionals devoted time to, among other things: (i) drafting and revising discovery requests and protective orders; (ii) coordinating document productions and repository management; (iii) reviewing and analyzing produced documents; and (iv) conducting related legal research and summarizing findings.

39. McDermott Professionals devoted a total of 56.8 hours to document request and discovery matters during the Compensation Period, for which compensation in the amount of \$64,714.50 is sought.

**E. General Case Administration
Amount Sought: \$359,868**

40. During the Compensation Period, McDermott Professionals devoted time to, among other things: (i) reviewing case background, docket filings, and pleadings; (ii) coordinating internal team communications and workstreams; and (iii) drafting declarations, responses, and notices.

41. McDermott Professionals devoted a total of 287.0 hours to general case administration matters during the Compensation Period, for which compensation in the amount of \$359,868 is sought.

**F. Examiner Investigation Work
Amount Sought: \$94,007**

42. During the Compensation Period, McDermott Professionals devoted time to, among other things: (i) reviewing deposition transcripts and document productions; (ii) preparing for and attending witness interviews; (iii) coordinating investigative strategy and follow-up; and (iv) analyzing factual records and legal issues.

43. McDermott Professionals devoted a total of 73.2 hours to investigative matters during the Compensation Period, for which compensation in the amount of \$94,007 is sought.

**G. Communications with Parties in Interest
Amount Sought: \$65,451**

44. During the Compensation Period, McDermott Professionals devoted time to, among other things: (i) corresponding with Debtor professionals, the U.S. Trustee, and other stakeholders; (ii) preparing and responding to letters and emails regarding the investigation; and (iii) discussing scope, budget, and report-related issues with external parties.

45. McDermott Professionals devoted a total of 45.5 hours to communications with parties in interest during the Compensation Period, for which compensation in the amount of \$65,451 is sought.

**H. Billing and Fee Applications
Amount Sought: \$45,984**

46. During the Compensation Period, McDermott Professionals devoted time to, among other things: (i) reviewing invoices to ensure compliance with the U.S. Trustee Guidelines; and (iii) preparing a final fee application for their necessary and reasonable fees.

47. McDermott Professionals devoted a total of 37.4 hours to billing and fee application matters during the Compensation Period, for which compensation in the amount of \$45,984 is sought.

I. Retention Work
Amount Sought: \$47,940.50

48. During the Compensation Period, McDermott Professionals devoted time to, among other things: (i) preparing the firm’s retention application and accompanying disclosures; (ii) coordinating pro hac vice motions and related certifications; (iii) responding to additional requests sought by the U.S. Trustee and other parties, and (iv) reviewing updated conflicts reports to ensure proper disclosure to the Court.

49. McDermott Professionals devoted a total of 43.4 hours to retention matters during the Compensation Period, for which compensation in the amount of \$47,940.50 is sought.

McDermott’s Requested Compensation Should be Allowed

46. By this Application, McDermott seeks final approval and allowance of compensation in the amount of \$500,000 for professional services rendered during the Compensation Period. During the Compensation Period, McDermott attorneys and paraprofessionals expended a total of 812.6 hours.

47. Bankruptcy Code Section 330(a)(1)(A) provides, in pertinent part, that the Court may award to a professional person “reasonable compensation for actual, necessary services rendered[.]” Section 330(a)(3), in turn, provides that:

In determining the amount of reasonable compensation to be awarded to . . . [a] professional person, the court shall consider the nature, the extent, and the value of such services, includes taking into account all relevant factors, including—

- (A) the time spent on such services;
- (B) the rates charged for such services;

- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of a cause under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

48. In determining the reasonableness of fees, courts routinely “employ the twelve factors set forth in *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974).” *Staiano v. Cain (In re Lan Assocs. XI, L.P.)*, 192 F.3d 109, 123 (3d Cir. 1999); see *In re Redington*, No. 16-18407, 2018 WL 6444387, at *8 (Bankr. D.N.J. Dec. 6, 2018) (applying the *Johnson* factors). These factors include: (1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation and ability of the attorneys; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. *Lan Assocs.*, 192 F.3d at 123 n.8.

49. In the instant case, McDermott devoted a substantial amount of time and effort to addressing the specific issues that the Examiner was tasked with investigating in the Chapter 11 Case. McDermott respectfully submits that the services for which it seeks compensation in this

Application were, at the time rendered, believed to be necessary to effectively represent the Examiner, and were performed economically, effectively, and efficiently. Because McDermott's services benefitted the Examiner and the Debtor's estate, McDermott respectfully submits that it performed "actual and necessary" services compensable under Section 330 of the Bankruptcy Code.

50. Further, McDermott submits that consideration of the relevant factors enumerated in *Lan Assocs.*, 192 F.3d at 123 n.8, establishes that the compensation requested is reasonable in light of the nature, extent, and value of such services to the Examiner:

- (a) *The Time and Labor Required.* The professional services rendered by the Examiner and McDermott on behalf of the Examiner has required the expenditure of substantial time and effort, as well as a high degree of professional competence and expertise, in order to address the many complex issues encountered by the Examiner in the Chapter 11 Case with skill and dispatch. McDermott respectfully represents that the services rendered by it were performed efficiently, effectively and economically.
- (b) *The Novelty and Difficulty of Questions.* The Chapter 11 Case and the Examiner's investigation have presented numerous novel questions of law arising from novel factual circumstances, both generally and in comparison with other construction/industrial bankruptcy cases.
- (c) *The Skill Required to Perform the Legal Services Properly.* McDermott believes that its recognized expertise in the area of insolvency proceedings and reorganization contributed to the efficient and effective representation of the Examiner in the Chapter 11 Case.
- (d) *The Preclusion of Other Employment by Applicant Due to Acceptance of the Case.* McDermott's representation of the Examiner did not preclude its acceptance of new clients. However, the complex issues that arose in the Chapter 11 Case and the limited time frame which the Examiner had to conduct his investigation required attention on a continuing and expedited basis, requiring McDermott Professionals to commit significant portions of their time to the Chapter 11 Case.
- (e) *The Customary Fee.* The fee sought herein is based on McDermott's normal hourly rates for services of this kind, subject to the 10% discount discussed herein. McDermott respectfully submits that the hourly rates of its professionals are not unusual given the time expended in attending to the

representation of the Examiner. McDermott's hourly rates and the fees requested herein are commensurate with fees McDermott has been awarded in other chapter 11 cases, as well as with fees charged by other attorneys of comparable experience.

- (f) Whether the Fee is Fixed or Contingent. Not applicable.
- (g) Time Limitations Imposed by Client or other Circumstances. After Special Committee filed its report, the Examiner had only a 45-day window within which to complete his investigation and file his report with the Court.
- (h) The Amount Involved and Results Obtained. McDermott respectfully submits that the amount of fees for which compensation is sought is reasonable under the circumstances given the numerous, complex issues that had to be addressed during the Compensation Period.
- (i) The Experience, Reputation and Ability of the Attorneys. McDermott is a well-known law firm and has proven substantial ability in the fields of bankruptcy, litigation, finance, and corporate law, among others. Darren Azman and Kristin Going, partners at McDermott, had primary responsibility for this case. Mr. Azman and Ms. Going have a wide breadth of experience in bankruptcy matters, enabling them to effectively render services to the Examiner in an efficient manner. In addition, McDermott's restructuring attorneys were supported by partners from the trial and litigation practice groups at McDermott.
- (j) The Undesirability of the Case. Not applicable.
- (k) The Nature and Length of Professional Relationship. As disclosed in the Retention Application, the Examiner, Todd Harrison, selected his own firm—McDermott—to represent him as counsel, based on the breadth and depth of McDermott's restructuring practice.
- (l) Awards in Similar Cases. As previously indicated, the fees sought herein are commensurate with fees McDermott has been awarded in other chapter 11 cases.

51. McDermott respectfully submits that the services for which it seeks compensation in the Application were, at the time rendered, necessary for and beneficial to the Examiner. McDermott further believes that it performed the services for the Examiner economically, effectively, and efficiently, and the results obtained benefited not only the Examiner, but also the

Debtor, its estate and its constituents. McDermott further submits that the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Examiner.

52. Allowance of compensation in the amount requested would result in a blended hourly billing rate of \$1,367. This reflects a blended rate of \$1,874 for partners, \$1,375 for counsel, \$1,214 for associates, and \$611 for other paraprofessionals. As is customary, hourly rates vary with the experience and seniority of the individuals assigned.

53. McDermott's hourly billing rates for attorneys were billed at a 10% discount, which ranged from \$920 to \$1,950 for professionals and from \$265 to \$740 for paraprofessionals. Of the aggregate time expended, 123.6 hours were expended by the Examiner, 46.2 hours were expended by other McDermott partners, 263.7 hours were expended by counsel, 329.4 hours were expended by associates, 49.7 hours were expended by paraprofessionals, totaling to 812.6 hours expended during the Compensation Period.

54. McDermott strives to staff matters efficiently. During the Compensation Period, McDermott made a concerted effort to strategically allocate resources so that routine tasks were handled in a cost-effective manner.

55. In addition to the agreed-upon 10% discount on its hourly rates, McDermott also agreed to a budget of \$500,000 in connection with the Authorized Investigation pursuant to the Scope and Budget Order, as described above. In other words, McDermott is voluntarily forgoing over \$600,000 of its incurred fees.

56. These rates and the corresponding rate structure reflect the complexity, and time pressures involved in the Chapter 11 Case and the investigation. Subject to the 10% discount agreed to by McDermott and as provided in the Retention Order, these hourly rates and the rate structure are consistent with those McDermott applies to restructuring, workout, bankruptcy, and

insolvency matters, as well as other complex corporate, securities, and litigation matters—whether in court or otherwise—regardless of whether a fee application is required. McDermott strives to staff matters efficiently. During the Compensation Period, McDermott made a concerted effort to strategically allocate resources so that routine tasks were handled in a cost-effective manner. Furthermore, on top of the agreed upon 10% discount, McDermott has voluntarily reduced its fees by over \$600,000, an amount that would otherwise be due and owing to McDermott.

Notice

57. Notice of the hearing on the Application will be served on all parties that have requested notice in the Chapter 11 Case pursuant to Bankruptcy Rule 2002.

No Prior Request

58. No prior request for the relief sought in the Application has been made to this or any other court.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, McDermott respectfully requests that the Court enter an order (the “Proposed Order”) attached hereto as **Exhibit H**: (a) granting the Application and authorizing, on a final basis, and consistent with the Scope and Budget Order, compensation in the amount of \$500,000 for professional services rendered during the Compensation Period; and (b) granting such other and further relief as the Court deems just and proper.

Dated: March 16, 2026

Respectfully submitted,

MCDERMOTT WILL & SCHULTE LLP

/s/ Deanna D. Boll

Darren Azman (admitted *pro hac vice*)

Kristin K. Going (admitted *pro hac vice*)

Deanna D. Boll (NJ Bar No. 031861998)

Nathaniel Allard (admitted *pro hac vice*)

One Vanderbilt Avenue

New York, New York 10017-3852

Telephone: (212) 547-5400

Facsimile: (212) 547-5444

dazman@mcdermottlaw.com

kgoing@mcdermottlaw.com

dboll@mcdermottlaw.com

nallard@mcdermottlaw.com

Counsel for Todd Harrison, Examiner

Exhibit A

Azman Declaration

MCDERMOTT WILL & SCHULTE LLP
Darren Azman (admitted *pro hac vice*)
Kristin K. Going (admitted *pro hac vice*)
Deanna D. Boll (NJ Bar No. 031861998)
Nathaniel Allard (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: (212) 547-5400
Facsimile: (212) 547-5444
dazman@mcdermottlaw.com
kgoing@mcdermottlaw.com
dboll@mcdermottlaw.com
nallard@mcdermottlaw.com

Counsel for Todd Harrison, Examiner

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

In re:

CCA Construction, Inc.,¹

Debtor.

(Hon. Christine M. Gravelle)

Chapter 11

Case No. 24-22548 (CMG)

**DECLARATION OF DARREN AZMAN IN SUPPORT OF
FIRST & FINAL FEE APPLICATION OF MCDERMOTT
WILL & SCHULTE LLP AS COUNSEL TO THE EXAMINER FOR
ALLOWANCE OF COMPENSATION FOR THE PERIOD FROM
APRIL 29, 2025 THROUGH AND INCLUDING OCTOBER 31, 2025**

I, Darren Azman, declare as follows:

1. I am a partner of the firm of McDermott Will & Schulte LLP (“McDermott” or the “Applicant”). McDermott maintains offices at One Vanderbilt Avenue, New York, New York 10017. I am a member in good standing of the bars of the Commonwealth of Massachusetts and the State of New York since 2011. I have been admitted to practice in the U.S. Court of Appeals

¹ The last four digits of the Debtor’s federal tax identification number are 4862. The Debtor’s service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.

for the Second Circuit, the U.S. Court of Appeals for the Third Circuit, the U.S. Bankruptcy Court for the Southern District of New York, and the U.S. District Courts for the District of Colorado, the District of Massachusetts, the Eastern District of New York and the Southern District of New York.² There are no disciplinary proceedings pending against me.

2. I have read the foregoing application of McDermott, counsel to the Examiner, for the Compensation Period (the "Application"). To the best of my knowledge, information and belief, the statements contained in the Fee Application are true and correct. In addition, I believe that the Application complies with Local Bankruptcy Rule 2016-1 and 2016-3.

3. In Connection therewith, I hereby certify that:

- (a) to the best of my knowledge, information, and belief, formed after reasonable inquiry, the fees and disbursements sought in the Application are permissible under the relevant rules, court orders, and Bankruptcy Code provisions, except as specifically set forth herein;
- (b) except to the extent disclosed in the Application, the fees and disbursements sought in the Fee Application are billed at rates customarily employed by McDermott and generally accepted by McDermott's clients. In addition, none of the professionals seeking compensation varied their hourly rate based on the geographic location of the Debtor's case;
- (c) McDermott is seeking compensation with respect to the \$500,000 allocated for the Authorized Investigation pursuant to the Scope and Budget Order and So Ordered Stipulation. McDermott voluntarily wrote down over \$600,000 of its fees accrued in the Chapter 11 Case.
- (d) in accordance with Rule 2016(a) of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 504, no agreement or understanding exists between McDermott and any other person for the sharing of compensation to be received in connection with the above case except as authorized pursuant to the Bankruptcy Code, Bankruptcy Rules, and Local Rules; and
- (e) all services for which compensation is sought were professional services on behalf of the Examiner and not on behalf of any other person.

² I have also been admitted *pro hac vice* in the Chapter 11 Case by order of this Court, dated May 16, 2025 [Docket No. 313].

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: March 16, 2026

By: /s/ Darren Azman
Darren Azman
McDermott Will & Schulte LLP

Exhibit B

Retention Order



Order Filed on May 31, 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(b)

MCDERMOTT WILL & EMERY LLP
Darren Azman (admitted *pro hac vice*)
Kristin K. Going (admitted *pro hac vice*)
Deanna D. Boll (NJ Bar No. 031861998)
Nathaniel Allard (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: (212) 547-5400
Facsimile: (212) 547-5444
dazman@mwe.com
kgoing@mwe.com
dboll@mwe.com
nallard@mwe.com

Proposed Counsel to the Examiner

In re:

CCA Construction, Inc.,¹

Debtor.

Case No. 24-22548 (CMG)

Chapter 11

Judge: Christine M. Gravelle

DATED: May 31, 2025


Honorable Christine M. Gravelle, Chief Judge
United States Bankruptcy Judge

¹ The last four digits of the Debtor's federal tax identification number are 4864. The Debtor's service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.



242254825060200000000001

(Page | 1)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

Caption of Order: Order Authorizing the Employment and Retention of McDermott Will & Emery LLP as Counsel to the Examiner Effective as of April 29, 2025

**ORDER AUTHORIZING THE EMPLOYMENT AND
RETENTION OF MCDERMOTT WILL & EMERY LLP AS
COUNSEL TO THE EXAMINER, EFFECTIVE AS OF APRIL 29, 2025**

The relief set forth on the following pages, numbered two (2) through four (4), is

ORDERED.

(Page | 2)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

Caption of Order: Order Authorizing the Employment and Retention of McDermott Will & Emery LLP as Counsel to the Examiner Effective as of April 29, 2025

Upon the application (the “Application”)¹ of Todd Harrison, as Court-appointed Examiner (the “Examiner”) in the above-captioned Chapter 11 case (the “Chapter 11 Case”) of CCA Construction, Inc. (the “Debtor”) for the approval of the Examiner’s retention and employment of McDermott Will & Emery LLP (“McDermott”) as counsel in connection with the Chapter 11 Case, effective April 29, 2025; and upon consideration of the declaration of Kristin K. Going (the “Going Declaration”), which is attached to the Application as Exhibit B; pursuant to section 327, standards equivalent to section 327, and to section 330 of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rule 2014-1; 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* as amended on September 18, 2012 (Simandle, C.J.); and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having reviewed the Application and the Going Declaration; and the Court being satisfied based on the representations made in the Application and the Going Declaration (a) McDermott does not hold or represent an interest adverse to CCA’s estate and (b) McDermott is a “disinterested person” as defined in section 101(14) of the Bankruptcy Code; and it appearing to the Court that the relief requested is in the best interests of CCA’s estate, its creditors, and other parties in interest; and notice of the Application appearing to be adequate and appropriate under the circumstances; and any objections to the requested relief having been

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

(Page | 3)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

Caption of Order: Order Authorizing the Employment and Retention of McDermott Will & Emery LLP as Counsel to the Examiner Effective as of April 29, 2025

withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Application is **GRANTED** to the extent set forth herein.
2. The Examiner's retention and employment of McDermott as counsel, effective as of April 29, 2025, in accordance with the terms and conditions set forth in the Application and the Going Declaration is approved.
3. McDermott is authorized to provide the Examiner with the professional services described in the Application.
4. McDermott shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Debtor's Chapter 11 Case in compliance with Bankruptcy Code sections 330 and 331.
5. McDermott shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in Appendix B – Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, which became Effective on November 1, 2013, in connection with both the Application and any interim or final fee applications that McDermott files in the Chapter 11 Case.
6. McDermott shall neither apply nor receive payment from the Debtor's estate for any fees or expenses arising from the defense of an objection to a request for the award, allowance, or payment of McDermott's fees and expenses.

(Page | 4)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

Caption of Order: Order Authorizing the Employment and Retention of McDermott Will & Emery LLP as Counsel to the Examiner Effective as of April 29, 2025

7. McDermott will review its files periodically during the pendency of the Chapter 11 Case to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, McDermott will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

8. To the extent that McDermott uses the services of contract attorney in this case, McDermott shall (a) pass through the cost of such contract attorneys to the Debtor at the same rate that McDermott pays the contract attorneys; (b) shall seek reimbursement for actual out-of-pocket expenses only; and (c) shall ensure that the contract attorneys are subject to the same conflict checks and disclosures as required of McDermott by Bankruptcy Rule 2014.

9. To the extent that the Application is inconsistent with this Order, this Order shall govern.

10. The Examiner and McDermott are authorized and empowered to take all actions they deem necessary and appropriate to effectuate the relief granted pursuant to this Order in accordance with the Application.

11. Notwithstanding any procedural rule to the contrary, this Order shall become effective and enforceable immediately on its entry.

12. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

13. The Court retains jurisdiction of any matter arising from or relating to this Order or its interpretation, implementation, or enforcement.

Form order – ntcorder

UNITED STATES BANKRUPTCY COURT

District of New Jersey
402 East State Street
Trenton, NJ 08608

Case No.: 24–22548–CMG
Chapter: 11
Judge: Christine M. Gravelle

In Re: Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

CCA Construction, Inc.
aka China Construction America, Inc., dba
ProServ Shared Services, dba Plaza
Construction
445 South Street
Suite 310
Morristown, NJ 07960

Social Security No.:

Employer's Tax I.D. No.:
13–3774862

**NOTICE OF JUDGMENT OR ORDER
Pursuant to Fed. R. Bankr. P. 9022**

Please be advised that on June 2, 2025, the court entered the following judgment or order on the court's docket in the above-captioned case:

Document Number: 349 – 335
Order Authorizing The Employment And Retention Of McDermott Will & Emery LLP As Counsel To The Examiner, Effective As Of April 29, 2025 (Related Doc # 335). Service of notice of the entry of this order pursuant to Rule 9022 was made on the appropriate parties. See BNC Certificate of Notice. Signed on 5/31/2025. (mjb)

Parties may review the order by accessing it through PACER or the court's electronic case filing system (CM/ECF). Public terminals for viewing are also available at the courthouse in each vicinage.

Dated: June 2, 2025
JAN: mjb

Jeanne Naughton
Clerk

Exhibit C

Customary and comparable compensation disclosures with fee applications

(see guidelines ¶ c.3. for definitions of terms used in this exhibit)

Category of Timekeeper (using categories already maintained by the firm)	Blended Hourly Rate	
	Non-Bankruptcy Blended Hourly Rate (\$) (all U.S.-based Timekeepers)	Billed In this Application
Partners	\$1,514	\$1,874
Counsel	\$1,341	\$1,375
Associates	\$979	\$1,214
Summer Associate	\$517	N/A
Paraprofessionals	\$481	\$611
Other (please define) – Project Manager	\$0	N/A
Other (please define) – Discovery Analyst	\$242	N/A
All timekeepers aggregated	\$1,172	\$1,367

Client Name: Todd Harrison, as the Examiner
Case Number: 24-22548 (CMG)
Applicant’s Name: McDermott Will & Schulte LLP
Date of Application: March 16, 2026
Interim or Final: Final

Exhibit D-1

Budget For the Compensation Period from April 29, 2025 Through October 31, 2025¹

Project Category	Estimated Hours	Estimated Fees
Examiner Time	125	\$250,000
Court Hearings	40	\$50,00
Report Preparation and Drafting	100	\$150,000
Document Requests and Discovery	50	\$75,000
General Case Administration	150	\$200,000
Examiner Investigation Work	100	\$150,000
Communications with Parties in Interests	35	\$50,000
Billing and Fee Applications	60	\$50,000
Retention Work	30	\$25,000
TOTALS	690	\$1,000,000

¹ This is the budget prepared by McDermott and the Examiner. McDermott and the Examiner were also aware that they were subject to the Scope and Budget Order [Docket No. 351] and the So Ordered Stipulation [Docket No. 431].

Exhibit D-2

Staffing Plan for the Compensation Period from April 29, 2025 Through October 31, 2025

Category of Timekeeper (using categories already maintained by the firm)	Number of Timekeepers Expected to Work on the Matter During the Budget Period	Average Hourly Rate
Partners	3	\$1,585 – \$1,950
Counsel	2	\$ 1375 – \$1380
Associates	4	\$920 – \$1335
Paraprofessionals	5	\$335 – \$740

Exhibit E
Summary of Billing by Professional for Compensation
Period from April 29, 2025 Through October 31, 2025

Name of Professional Person	Date of Bar Admission (if applicable)	Position with the Applicant and Practice Area	Hourly Billing Rate¹	Total Billed Hours	Total Compensation
Todd Harrison	1997	Partner; White Collar & Securities Defense	\$1,950	123.6	\$241,020
Kristin K. Going	2002	Partner; Corporate Advisory	\$1,675	45.7	\$76,547.50
Darren Azman	2011	Partner; Corporate Advisory	\$1,585	0.5	\$792.50
Deanna D. Boll	1998	Counsel; Corporate Advisory	\$1,380	22.7	\$31,326
Nathaniel Allard	2013	Counsel; Corporate Advisory	\$1,375	241.0	\$331,375
Kenton Atta-Krah	2017	Associate; Trial	\$1,335	84.6	\$112,941
Luke Barrett	2018	Associate; Corporate Advisory	\$1,300	85.8	\$111,540
Alexandra Nasar	2021	Associate; Trial	\$1,210	100.1	\$ 121,121
Joshua C. Lee	2023	Associate; Corporate Advisory	\$920	58.9	\$54,188
Daniel Northrop	N/A	Paralegal; Corporate Advisory	\$740	26.7	\$19,758
Edward Kwon	N/A	Legal Support; McDermott Discovery	\$565	5.9	\$3,333.50
Kathleen Jackson	N/A	Paralegal; Trial	\$445	14.0	\$6,230

¹ The rates reflect a 10% discount for all McDermott professionals, except for Examiner Todd Harrison, who billed at a further voluntarily reduced rate of \$1,950.

Name of Professional Person	Date of Bar Admission (if applicable)	Position with the Applicant and Practice Area	Hourly Billing Rate¹	Total Billed Hours	Total Compensation
John Hoffman	N/A	Administrative; Research & Libraries	\$385	1.1	\$423.50
Jacque Bishop Jones	N/A	Paralegal; Corporate Advisory	\$355	1.0	\$355
Daniel Valentino	N/A	Legal Support; McDermott Discovery	\$265	1.0	\$265
TOTALS				812.6	\$1,111,216.00

All Timekeepers Blended Hourly Rate: \$1,367
Attorney Blended Hourly Rate: \$1,417

Exhibit F

**Compensation by Project Category for Compensation
Period from April 29 2025 Through October 31, 2025**

Project Category	Total Hours	Total Fees
Examiner Time	123.6	\$241,020
Court Hearings	43.3	\$54,863.50
Report Preparation and Drafting	102.4	\$137,367.50
Document Requests and Discovery	56.8	\$64,714.50
General Case Administration	287.0	\$359,868
Examiner Investigation Work	73.2	\$94,007
Communications with Parties in Interests	45.5	\$65,451
Billing and Fee Applications	37.4	\$45,984
Retention Work	43.4	\$47,940.50
TOTALS	812.6	\$1,111, 216

Exhibit G

Time Detail



Invoice: 4062797
Client: 126965

11/06/2025

Mr. Todd Harrison
McDermott Will & Emery
1 Vanderbilt Avenue
New York, NY 10017

For Services Rendered in Connection with:

Matter: 0011 Examiner for CCA Construction

Task / Date	Desc. / Name	Hours	Amount	Description
B001 05/02/25	Examiner Time T. Harrison	3.80	7,410.00	Conference with MWS team re investigation launch (.6); conference with Debtor's counsel and MWS team re case background (.5); review relevant filings, documents and related information (2.7).
B001 05/03/25	Examiner Time T. Harrison	2.00	3,900.00	Review filings and related documents and information (1.0); plan investigation (1.0).
B001 05/04/25	Examiner Time T. Harrison	2.30	4,485.00	Conference with litigation team re launch of investigation and next steps (.3); review filings and documents and plan investigation (2.0).
B001 05/05/25	Examiner Time T. Harrison	3.80	7,410.00	Review filings, documents and related information.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 05/06/25	Examiner Time T. Harrison	3.20	6,240.00	Conference with BMLP counsel, N. Allard and K. Going re investigation strategy (1.0); review filings and related documents and information (2.2).
B001 05/07/25	Examiner Time T. Harrison	3.00	5,850.00	Review documents and information to plan investigation (1.8); email communications with MWS team re same (.2); discussion with K. Going re same (.3); review protective order and sign agreement (.2); review and revise draft letter (.3); review BMLP letter (.2).
B001 05/08/25	Examiner Time T. Harrison	0.50	975.00	Conference with K. Atta-Krah and A. Nasar re document collection and review (.4); email communications with MWS team re document review in connection with investigation (.1).
B001 05/09/25	Examiner Time T. Harrison	2.20	4,290.00	Review letters from Cole Schotz (.5); email correspondences with MWS team re same (.2); review documents and prepare for investigation (1.5).
B001 05/09/25	Examiner Time T. Harrison	0.40	780.00	Conference with D. Azman and K. Going re updates on investigation prep and next steps (.2); conference with F. Steele, S. Bernie and P. D'Auria of the UST, D. Azman and K Going re same (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 05/10/25	Examiner Time T. Harrison	0.70	1,365.00	Review and revise submission re CCA scope of Examiner investigation (.5); email communications re same (.2).
B001 05/12/25	Examiner Time T. Harrison	0.50	975.00	Call with UST re investigation (.1); follow up call with D. Azman and K. Going re same (.2); email communications re workstreams (.2).
B001 05/13/25	Examiner Time T. Harrison	1.60	3,120.00	Call with K. Atta-Krah and A. Nasar re scope submissions (.5); review and revise scope submission (.5); call with US Trustee's Office, D. Azman and K. Going re same (.2); follow up call with D. Azman and K. Going re same (.1); email communications with MWS team re workstream and scope submissions (.3).
B001 05/14/25	Examiner Time T. Harrison	5.70	11,115.00	Conferences with K. Going re investigation matters and scope (.4); conference with UST, D. Azman and K. Going re same (.4); conference with Debevoise team, K. Atta-Krah and K. Going re same (1.2); review and revise new disclosure statement (.4); review and revise draft submission regarding scope (.7); email communications with MWS team re new disclosure and scope submission (.6); review research re new disclosure (.5); review related documents re same (1.1); review



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
				letter from Cole Schotz (.4).
B001 05/15/25	Examiner Time T. Harrison	6.40	12,480.00	Email communications with MWS on case status and review of related materials (1.7); review and revise scope submission (1.5); review and revise responsive letter to Cole Schotz (0.5); review documents re to verification (0.4); review and revise draft declaration (0.7); teleconferences with F. Steele (0.2); conferences with D. Azman and K. Going re scope (0.3); review debtor's filed brief (1.1).
B001 05/16/25	Examiner Time T. Harrison	7.40	14,430.00	Correspond with N. Allard re scope (.1); conference with J. Calandra re same and May 22 Scope Hearing (1.3); email communication with MWS team re same (2.5); conference with J. Lutz re same (.1); conference with D. Azman re same (.3); review communication from M. Sirota and consider relevant documents and response (.7); review relevant filings and related documents (1.6); review related research (.8).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 05/17/25	Examiner Time T. Harrison	0.60	1,170.00	Conference with J. Calandra re communication from M. Sirota and scope hearing (.1); conference with J. Calandra and K. Going re same (.2); draft correspondence to opposing counsel (.3).
B001 05/18/25	Examiner Time T. Harrison	1.70	3,315.00	Conference with J. Calandra re draft correspondence to opposing counsel (1.0); email communications with MWS team re same (.7).
B001 05/19/25	Examiner Time T. Harrison	3.70	7,215.00	Attend weekly team call (.5); email communications with MWS team re scope hearing and case updates (.9); conference with UST and K Going re same (.2); review and revise declarations (1.4); review and revise draft response brief (.7).
B001 05/20/25	Examiner Time T. Harrison	2.80	5,460.00	Prepare for scope hearing (2.0); review relevant documents and information (.8).
B001 05/21/25	Examiner Time T. Harrison	3.40	6,630.00	Conference with UST re scope hearing (.1); conferences with J. Calandra re scope hearing preparation (.4); review documents, filings and related information to prepare for scope hearing (.8); conference with K. Going and J. Calandra re same (.8); email communications with MWS team re same (.6); review email from



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
				Debevoise and related documents and information (.5); review agenda for scope hearing (.2).
B001 05/22/25	Examiner Time T. Harrison	6.50	12,675.00	Discussions with debtor's counsel, creditor's counsel and US Trustee representatives re scope of investigation (4.0); attend scope hearing (1.5); conferences with MWS team re same (.8); conference with J. Calandra re same (.2).
B001 05/23/25	Examiner Time T. Harrison	1.00	1,950.00	Conference with D. Azman, K. Going and D. Boll re next steps in connection with scope (.5); email communications with MWS team re same (.2); conference with J. Calandra re same (.1); conference with Cole Schotz team re scope of investigation (.2).
B001 05/26/25	Examiner Time T. Harrison	0.90	1,755.00	Review transcript of hearing (.5); review related documents re same (.4).
B001 05/27/25	Examiner Time T. Harrison	1.20	2,340.00	Conference with D. Azman and K. Going re next steps on investigation (.5); conference with UST and K. Going re same (.5); follow up call with K. Going re same and workstreams (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 05/28/25	Examiner Time T. Harrison	4.50	8,775.00	Review documents and information to prepare for witness interview (1.0); attend interview with Cole Schotz team (2.3); conferences with D. Azman re same (.2); conference with D. Azman and Cole Schotz team re budget negotiations (.2); review and revise draft order and stipulation re budget increase (.5); email communications re same (.3).
B001 05/29/25	Examiner Time T. Harrison	0.70	1,365.00	Review draft order and stipulation re budget increase (.2); email communications with MWS team re same (.4); conference with K. Going re same (.1).
B001 05/30/25	Examiner Time T. Harrison	1.00	1,950.00	Review interview notes and related information.
B001 05/31/25	Examiner Time T. Harrison	0.30	585.00	Email communications re draft order and stipulation re budget increase (.1); review draft order and stipulation re budget increase (.2).
B001 06/02/25	Examiner Time T. Harrison	1.00	1,950.00	Email communications re witness interviews (.2); review documents and information to prepare for interviews (.8).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 06/03/25	Examiner Time T. Harrison	1.60	3,120.00	Attend witness interview (1.5); conference with D. Harris re same (.1).
B001 06/05/25	Examiner Time T. Harrison	2.60	5,070.00	Attend witness interview (2.1); review new BMLP letter (.5).
B001 06/06/25	Examiner Time T. Harrison	4.50	8,775.00	Attend witness interview.
B001 06/09/25	Examiner Time T. Harrison	1.50	2,925.00	Conference with K. Going and N. Allard re investigation updates (.5); conference with N. Allard re same (.4); review related documents and information re same (.4); review new anonymous letter (.2).
B001 06/10/25	Examiner Time T. Harrison	0.50	975.00	Conference with D. Azman re investigation updates (.1); email communications with MWS team and review related information re investigation (.4).
B001 06/11/25	Examiner Time T. Harrison	1.20	2,340.00	Correspond with N. Allard re call with Debtors counsel (.1); review documents and related information and prepare for telephone conference with Cole Schotz (.8); conference with N. Allard and Cole Schotz team



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
				re investigation (.3).
B001 06/17/25	Examiner Time T. Harrison	1.00	1,950.00	Review documents and information to prepare for witness interview.
B001 06/18/25	Examiner Time T. Harrison	2.90	5,655.00	Review documents and information to prepare for witness interview (1.0); attend interview (1.5); discussion with N. Allard re same (.2); conference with K. Going re same (.1); email communications with MWS team re same (.1).
B001 06/19/25	Examiner Time T. Harrison	0.50	975.00	Review documents in connection with ongoing investigation.
B001 06/20/25	Examiner Time T. Harrison	0.10	195.00	Email communications with MWS team in connection with ongoing investigation.
B001 06/21/25	Examiner Time T. Harrison	1.00	1,950.00	Email communications with MWS team in connection with ongoing investigation (.4); review related documents and information re same (.6).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 06/24/25	Examiner Time T. Harrison	0.40	780.00	Conference with N. Allard re new documents in connection with investigation (.1); review documents and letter from Cole Schotz (.3).
B001 06/26/25	Examiner Time T. Harrison	0.40	780.00	Review documents in connection with ongoing investigation.
B001 06/27/25	Examiner Time T. Harrison	0.80	1,560.00	Conference with N. Allard re ongoing investigation (.3); conference with K. Going and N. Allard re same (.5).
B001 07/01/25	Examiner Time T. Harrison	0.20	390.00	Emails re the ongoing investigation.
B001 07/03/25	Examiner Time T. Harrison	0.20	390.00	Review memorandum from Cole Schotz.
B001 07/07/25	Examiner Time T. Harrison	0.20	390.00	Conference with the UST and N. Allard re investigation updates and report preparation.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 07/09/25	Examiner Time T. Harrison	0.60	1,170.00	Review BMLP filed motion.
B001 07/14/25	Examiner Time T. Harrison	0.10	195.00	Emails re the ongoing investigation.
B001 07/21/25	Examiner Time T. Harrison	0.40	780.00	Review draft letter to Cole Schotz re investigation (.2); conference with N. Allard re same (.2).
B001 07/22/25	Examiner Time T. Harrison	0.50	975.00	Review draft letter to Cole Schotz re investigation (.2); correspond with N. Allard re same (.3).
B001 07/23/25	Examiner Time T. Harrison	1.20	2,340.00	Conference with N. Allard re report (.5); conference with K. Going and N. Allard re same (.3); review draft Special Committee report (.4).
B001 07/24/25	Examiner Time T. Harrison	1.80	3,510.00	Correspond with N. Allard re draft Special Committee report (.3); conference with Cole Schotz team and N. Allard re same (.2); review research and related documents and information in connection with ongoing investigation (1.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 07/27/25	Examiner Time T. Harrison	1.50	2,925.00	Review draft Special Committee report.
B001 07/28/25	Examiner Time T. Harrison	2.00	3,900.00	Conference with N. Allard re draft Special Committee report (.2); conference with K. Going and N. Allard re same (.3); email communications with MWS team re same (.3); review and revise draft communication re same (.2); review draft Special Committee report (1.0).
B001 07/29/25	Examiner Time T. Harrison	1.30	2,535.00	Review draft Special Committee report.
B001 07/31/25	Examiner Time T. Harrison	2.50	4,875.00	Review draft Special Committee report (2); review and revise responsive motion re same (.3); email communications with MWS team re same (.2).
B001 08/01/25	Examiner Time T. Harrison	1.30	2,535.00	Review draft Special Committee report and redline related documents and information (1.0); email communications with MWS team re same (.1); review filings for upcoming hearing (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 08/06/25	Examiner Time T. Harrison	1.10	2,145.00	Review letter from BMLP (.3); review submissions for hearing (.5); email communications with MWS team re same (.3).
B001 08/07/25	Examiner Time T. Harrison	0.50	975.00	Email communications with MWS team re investigation.
B001 08/12/25	Examiner Time T. Harrison	1.50	2,925.00	Call with N. Allard re draft Examiner report (.2); review Special Committee report and related information (1.3).
B001 08/16/25	Examiner Time T. Harrison	1.30	2,535.00	Review new BMLP filings.
B001 08/18/25	Examiner Time T. Harrison	1.50	2,925.00	Review draft Examiner report (1.1); review ColeSchotz report and related documents and information (.4).
B001 08/25/25	Examiner Time T. Harrison	1.20	2,340.00	Review draft Examiner report and Special Committee report.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 08/28/25	Examiner Time T. Harrison	2.00	3,900.00	Review draft Examiner report and Special Committee report (1.1); review new documents from Cole Schotz (.9).
B001 09/09/25	Examiner Time T. Harrison	3.00	5,850.00	Review draft Examiner report (1.6); review Special Committee report and related documents (1.4).
B001 09/12/25	Examiner Time T. Harrison	3.80	7,410.00	Review documents and related information (1); review Special Committee report (.8); review and revise draft Examiner report (2).
B001 09/15/25	Examiner Time T. Harrison	1.20	2,340.00	Call with N. Allard and K. Going re draft Examiner report (.2); finalize draft Examiner report (1.0).
B001 09/19/25	Examiner Time T. Harrison	0.20	390.00	Email communications with MWS team re Examiner's Report.
B001 09/22/25	Examiner Time T. Harrison	0.30	585.00	Email communications with MWS team re Examiner report and revisions.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B001 09/29/25	Examiner Time T. Harrison	0.40	780.00	Review proposed redactions re Examiner report (.2); email communications with MWS re same (.2).
B002 05/04/25	Court Hearings L. Barrett	0.30	390.00	Correspond with MWS Team re Scope Hearing.
B002 05/04/25	Court Hearings K. Atta-Krah	0.40	534.00	Develop strategy for omnibus hearing with litigation team.
B002 05/05/25	Court Hearings N. Allard	0.70	962.50	Attend CCA hearing virtually (.5); draft summary for MWS team (.2).
B002 05/05/25	Court Hearings J. Lee	0.70	644.00	Review hearing transcripts (.5); email K. Attah-Krah and A. Nasar re same (.2).
B002 05/19/25	Court Hearings J. Lee	0.40	368.00	Call with N. Allard re prepping hearing exhibits (.2); emails re same (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B002 05/20/25	Court Hearings K. Going	2.60	4,355.00	Prepare for Scope hearing.
B002 05/20/25	Court Hearings N. Allard	3.00	4,125.00	Correspond with J. Calandra and J. Lee to prepare for Court hearing (.5), prepare for hearing (2.5).
B002 05/20/25	Court Hearings K. Atta-Krah	1.70	2,269.50	Review and prepare materials for omnibus hearing (1.0); review communications and filings from debtor's and creditor's counsel regarding same (.7).
B002 05/20/25	Court Hearings J. Lee	4.50	4,140.00	Prepare binders and exhibits for hearing (3.4); correspondences with N. Allard re same (.5); confer with K. Williams re same (.3); confer with M. Selby re same (.3).
B002 05/20/25	Court Hearings A. Nasar	1.20	1,452.00	Correspond with MWS team regarding preparations for hearing on Examiner scope (.1); review documents in aid of same (1.1).
B002 05/20/25	Court Hearings L. Barrett	2.10	2,730.00	Review, analyze transcripts re Scope Hearing (.8); correspond with K. Going re same (.2); review, analyze filings re Scope Hearing (.9); correspond with K. Going re same (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B002 05/20/25	Court Hearings D. Northrop	2.20	1,628.00	Assemble documents/exhibits to be included in witness binders for the 5/22/2025 hearing (1.5); coordinate preparation and delivery of witness binders (.7).
B002 05/21/25	Court Hearings N. Allard	1.30	1,787.50	Prepare for hearing (.7) and correspond with J. Calandra re same (.3), correspond with K. Going, D. Boll re same (.3).
B002 05/21/25	Court Hearings A. Nasar	0.20	242.00	Correspond with MWS team regarding hearing on Examiner scope (.2).
B002 05/21/25	Court Hearings D. Boll	1.20	1,656.00	Prep for hearing on Examiner scope and budget.
B002 05/22/25	Court Hearings L. Barrett	4.10	5,330.00	Prepare for, attend Examiner Scope Hearing (3.8); correspond with MWS Team re same (.3).
B002 05/22/25	Court Hearings J. Lee	0.50	460.00	Confer with N. Allard and L. Barrett re scope hearing (.3); review agenda re same (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B002 05/22/25	Court Hearings N. Allard	2.30	3,162.50	Attend portions of hearing by Zoom and monitor developments during recess (2.0), review potential terms to resolve items on hearing agenda (.3).
B002 05/22/25	Court Hearings A. Nasar	3.10	3,751.00	Attend Examiner Scope and Budget Hearing (1.8); correspond with MWS team regarding same (.2); review documents in preparation for same (1.1).
B002 05/22/25	Court Hearings D. Boll	5.30	7,314.00	Participate in scope and budget hearing (.8); participate in related settlement negotiations with debtor's counsel and creditor's counsel throughout the day (4.5).
B002 08/05/25	Court Hearings N. Allard	0.50	687.50	Prepare for hearing.
B002 08/06/25	Court Hearings N. Allard	1.00	1,375.00	Correspond with K. Going re hearing prep (.3), prepare for hearing (.7).
B002 08/07/25	Court Hearings N. Allard	1.00	1,375.00	Prepare for (.3) and participate in hearing (.4), follow-up with MWS team re same (.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B002 10/08/25	Court Hearings N. Allard	0.30	412.50	Prepare for hearing and review agenda.
B002 10/09/25	Court Hearings N. Allard	2.70	3,712.50	Prepare for (.2) and attend hearing (2.1), follow-up correspondence with MWS team re same (.2), review news reports on hearing (.2)
B003 07/25/25	Report Preparation and Drafting N. Allard	4.00	5,500.00	Review draft report from Cole Schotz.
B003 07/26/25	Report Preparation and Drafting N. Allard	3.50	4,812.50	Review Special Committee draft report and analyze same.
B003 07/27/25	Report Preparation and Drafting N. Allard	4.00	5,500.00	Analyze Special Committee report (2.5), draft summary to MWS team re same (1.5).
B003 07/28/25	Report Preparation and Drafting K. Going	1.30	2,177.50	Review analysis of special committee report (.8); call with examiner regarding same (.5).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B003 07/28/25	Report Preparation and Drafting N. Allard	0.60	825.00	Correspond with T. Harrison, K. Going re Special Committee draft report (.3), call with same re same (.3).
B003 07/28/25	Report Preparation and Drafting N. Allard	4.20	5,775.00	Further review (1.7) and summarize draft report (1.3), review of related materials (1.2).
B003 07/28/25	Report Preparation and Drafting K. Going	1.30	2,177.50	Review analysis of examiner draft report and proposed responses.
B003 07/29/25	Report Preparation and Drafting N. Allard	0.20	275.00	Correspond re draft report with MWS team.
B003 07/29/25	Report Preparation and Drafting N. Allard	4.50	6,187.50	Begin outlining and drafting of Examiner Report.
B003 07/30/25	Report Preparation and Drafting N. Allard	1.50	2,062.50	Initial drafting of Examiner Report.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B003 07/31/25	Report Preparation and Drafting N. Allard	2.80	3,850.00	Review Special Committee final report (2.0), review exhibits (.5), correspond with MWS team re same (.3).
B003 08/01/25	Report Preparation and Drafting N. Allard	4.20	5,775.00	Correspond with T. Harrison, K. Going re Special Committee report (.2), review of same (2.5), review appendices to Special Committee report (1.5).
B003 08/04/25	Report Preparation and Drafting N. Allard	2.30	3,162.50	Draft report.
B003 08/05/25	Report Preparation and Drafting N. Allard	1.50	2,062.50	Prepare report.
B003 08/06/25	Report Preparation and Drafting N. Allard	1.30	1,787.50	Further review of Special Committee report (1.0), review appendices (.3).
B003 08/07/25	Report Preparation and Drafting N. Allard	1.90	2,612.50	Review materials in connection with preparation of Examiner Report (.7), prepare draft Examiner Report (1.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B003 08/08/25	Report Preparation and Drafting N. Allard	4.00	5,500.00	Draft Examiner report (3.3); review of related materials (.7).
B003 08/11/25	Report Preparation and Drafting N. Allard	3.30	4,537.50	Draft Examiner Report.
B003 08/12/25	Report Preparation and Drafting N. Allard	1.00	1,375.00	Review materials related to Examiner Report (.8), call with T. Harrison re same (.2).
B003 08/13/25	Report Preparation and Drafting N. Allard	2.00	2,750.00	Review additional documents produced by Cole Schotz.
B003 08/14/25	Report Preparation and Drafting N. Allard	3.30	4,537.50	Review documents produced by Cole Schotz (1.0), further draft Examiner Report (2.3).
B003 08/15/25	Report Preparation and Drafting N. Allard	1.80	2,475.00	Update draft Examiner Report.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B003 08/18/25	Report Preparation and Drafting N. Allard	0.90	1,237.50	Update draft Examiner report (.7), correspond with T. Harrison, K. Going re same (.2).
B003 08/18/25	Report Preparation and Drafting K. Going	1.10	1,842.50	Discuss status of draft report with N. Allard (.3); review filings by BMLP for derivative and direct standing (.8).
B003 08/20/25	Report Preparation and Drafting N. Allard	0.40	550.00	Correspond with D. Northrup re details of filing report and review of same (.3), correspond with K. Going re report process (.1).
B003 08/21/25	Report Preparation and Drafting N. Allard	1.20	1,650.00	Review additional material for report.
B003 08/21/25	Report Preparation and Drafting K. Going	1.90	3,182.50	Review examiner materials and information (1.6); meeting with N. Allard regarding report (.3).
B003 08/22/25	Report Preparation and Drafting N. Allard	1.80	2,475.00	Update draft Examiner Report (1.7) and correspond with K. Going re same (.1).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B003 08/25/25	Report Preparation and Drafting N. Allard	2.60	3,575.00	Update draft report based on comments received (2.4), correspond with J. Lee re research for same (.2).
B003 08/25/25	Report Preparation and Drafting J. Lee	1.40	1,288.00	Research re report (1.0); draft email memorandum to N. Allard re same (.4).
B003 08/25/25	Report Preparation and Drafting K. Going	1.40	2,345.00	Review and comment on revisions to examiner report.
B003 08/28/25	Report Preparation and Drafting N. Allard	2.60	3,575.00	Review additional documents produced (1.0); update draft Examiner report (1.2); correspondence with T. Harrison, K. Going re same (.4).
B003 08/29/25	Report Preparation and Drafting N. Allard	0.30	412.50	Correspond with D. Northrop re preparing for filing Report.
B003 09/03/25	Report Preparation and Drafting D. Northrop	0.10	74.00	E-mail correspondence with N. Allard regarding filing documents under seal.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B003 09/04/25	Report Preparation and Drafting N. Allard	1.00	1,375.00	Review issues for report.
B003 09/05/25	Report Preparation and Drafting N. Allard	0.80	1,100.00	Review issues for final Report.
B003 09/05/25	Report Preparation and Drafting N. Allard	0.10	137.50	Email to K. Going re update on report.
B003 09/08/25	Report Preparation and Drafting N. Allard	1.20	1,650.00	Correspond with T. Harrison, K. Going re report (.2); review of related issues for report (1.0).
B003 09/09/25	Report Preparation and Drafting N. Allard	1.40	1,925.00	Review items in connection with finalizing Examiner Report.
B003 09/10/25	Report Preparation and Drafting N. Allard	0.70	962.50	Review issues for final report.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B003 09/11/25	Report Preparation and Drafting N. Allard	2.00	2,750.00	Finalize items for Examiner Report and correspond with T. Harrison re same.
B003 09/12/25	Report Preparation and Drafting N. Allard	6.50	8,937.50	Review draft Examiner Report (2.0), update Examine Report in advance of filing (2.5), perform further review of draft Examiner Report (1.5), correspond with MWS team re same (.5).
B003 09/13/25	Report Preparation and Drafting D. Northrop	0.70	518.00	Review draft Examiner report.
B003 09/14/25	Report Preparation and Drafting J. Lee	2.20	2,024.00	Review Examiner report (2); email N. Allard re same (.2).
B003 09/15/25	Report Preparation and Drafting N. Allard	7.20	9,900.00	Review comments to Examiner Report (1.0), update same (1.0), perform final review of Examiner Report in advance of filing (3.0), further update and review Examiner Report for filing (1.5), call with T. Harrison and K. Going re finalizing report (.2), correspond with D. Northrop re filing and related issues (.5).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B003 09/15/25	Report Preparation and Drafting K. Going	1.20	2,010.00	Review and revise draft Examiner Report (.8); teleconference with N. Allard and T. Harrison re same (.4).
B003 09/15/25	Report Preparation and Drafting D. Northrop	3.10	2,294.00	Continue review of draft Examiner report (.3); multiple e-mail correspondence with N. Allard regarding revisions to Examiner report (.2); revise Examiner report for filing (.7); finalize Examiner report for filing on the ECF case docket and conduct final review of the final pdf document (.4); telephone conference with N. Allard regarding final version of the Examiner report to be filed under seal (.1); file Examiner report under seal via ECF (.4); revise/finalize notice of filing of sealed version of the Examiner's report for filing on the public case docket (.1); revise/finalize certificate of service for notice of filing of sealed version of Examiner's report (.3); e-mail correspondence with N. Allard regarding same (.1); file notice of filing and certificate of service on the public ECF case docket (.3); coordinate service of notice of filing of Examiner's report under seal (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B003 09/19/25	Report Preparation and Drafting N. Allard	0.90	1,237.50	Internal MWS correspondence re redactions (.2), review of related issues (.5), correspond with D. Northrop re case updates (.2).
B003 09/22/25	Report Preparation and Drafting N. Allard	0.40	550.00	Review proposed redactions to Examiner Report.
B003 09/24/25	Report Preparation and Drafting D. Northrop	0.50	370.00	Review proposed redactions to Examiner report (.1); draft notice of filing for redacted Examiner report (.4).
B003 09/27/25	Report Preparation and Drafting D. Northrop	0.60	444.00	Draft/prepare certificate of service, including updating service list, for notice of filing of redacted Examiner's report.
B003 10/03/25	Report Preparation and Drafting D. Northrop	0.70	518.00	Prepare redacted version of Examiner report to be filed on the case docket on 10/6/2025 (.5); e-mail correspondence with N. Allard re issues relating to preparation of redacted Examiner report (.2).
B003 10/06/25	Report Preparation and Drafting D. Northrop	1.00	740.00	Review joint letter filed by CSCEC Holding Company, Inc. and BML Properties, Ltd. requesting the Court's assistance in resolving redaction dispute regarding the Special Committee Report and



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
				related e-mail correspondence relating to the potential impact of the ongoing redaction dispute on the filing of the redacted Examiner's report (.2); review redacted version of Special Committee Report filed on 10/6/2025 (.1); finalize notice of filing of reacted Examiner report, Ex. A thereto (being the redacted Examiner report), and related certificate of service for filing on the ECF case docket (.2); file notice of filing of reacted Examiner report, Ex. A thereto, and certificate of service on the ECF case docket (.3); coordinate service of redacted Examiner report (.2).
B004 04/30/25	Document Requests and Discovery J. Lee	0.70	644.00	Review bankruptcy and NYS protective order (.5); email K. Going re same (.2).
B004 04/30/25	Document Requests and Discovery L. Barrett	2.70	3,510.00	Draft discovery requests.
B004 05/01/25	Document Requests and Discovery L. Barrett	7.30	9,490.00	Review, analyze case filings re discovery issues (2.2); draft discovery requests (3.4); correspond with N. Allard re same (.4); review, revise same (1.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B004 05/01/25	Document Requests and Discovery K. Going	1.80	3,015.00	Review filings in bankruptcy court, including Protective Order for comments.
B004 05/02/25	Document Requests and Discovery K. Atta-Krah	0.80	1,068.00	Revise drafts of discovery lists and proposed requests.
B004 05/02/25	Document Requests and Discovery N. Allard	0.80	1,100.00	Review issues re confidentiality and protective orders (.5); related correspondence with K. Going, L. Barrett (.3).
B004 05/02/25	Document Requests and Discovery K. Atta-Krah	2.10	2,803.50	Research confidentiality agreements and protective orders (1.5); summarize use restrictions re same (.6).
B004 05/02/25	Document Requests and Discovery K. Going	1.00	1,675.00	Review bullet points on Protective Order (.5); prepare proposed revision (.5).
B004 05/02/25	Document Requests and Discovery L. Barrett	2.60	3,380.00	Research re precedent examiner protective orders (2.3); correspond with K. Going, N. Allard re same (.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B004 05/05/25	Document Requests and Discovery N. Allard	0.70	962.50	Review and propose modifications to Protective Order (.5), related call with L. Barrett (.2).
B004 05/05/25	Document Requests and Discovery E. Kwon	0.60	339.00	Prepare documents for Examiner for case development review in the discovery document repository.
B004 05/05/25	Document Requests and Discovery K. Going	0.40	670.00	Review and respond to Protective Order issues.
B004 05/06/25	Document Requests and Discovery E. Kwon	0.60	339.00	Prepare documents for case development review in the discovery document repository.
B004 05/06/25	Document Requests and Discovery K. Atta-Krah	2.80	3,738.00	Coordinate document receipt and retention from creditor's counsel (.3); review same and provide substantive summary to team (2.5).
B004 05/06/25	Document Requests and Discovery A. Nasar	0.80	968.00	Review production of documents received.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B004 05/07/25	Document Requests and Discovery K. Atta-Krah	1.80	2,403.00	Provide direction to legal specialist regarding document organization (.4); review, analyze, and summarize document production from BMLP's counsel (.9); exchange emails with A. Nasar regarding drafting brief, review of precedent, and legal research (.5).
B004 05/08/25	Document Requests and Discovery E. Kwon	0.30	169.50	Prepare additional documents for case development review in the discovery document repository.
B004 05/08/25	Document Requests and Discovery A. Nasar	5.70	6,897.00	Review document productions received May 5-7, 2025 (1.7); research case law, secondary sources, and precedents from other actions regarding examiner investigations and applicable legal standards (2.7); summarize findings regarding same (1.1); correspond with MWS litigation team regarding same (.2).
B004 05/08/25	Document Requests and Discovery K. Atta-Krah	0.50	667.50	Coordinate with A. Nasar re receipt of document productions.
B004 05/08/25	Document Requests and Discovery L. Barrett	0.50	650.00	Call with N. Allard re Protective Order (.3); correspond with K. Going re same (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B004 05/09/25	Document Requests and Discovery E. Kwon	0.20	113.00	Prepare report of received documents; assist with review of responsive documents.
B004 05/09/25	Document Requests and Discovery K. Jackson	4.50	2,002.50	Create binders of all document productions to date for review.
B004 05/09/25	Document Requests and Discovery A. Nasar	1.60	1,936.00	Review production of documents received (1.4); correspond with MWS team regarding same (.2).
B004 05/12/25	Document Requests and Discovery K. Atta-Krah	4.00	5,340.00	Review proposed phase 1 documents (1.4); review and comment on A. Nasar phase 1 proposals (1.8); conferences with A. Nasar re same (.8).
B004 05/13/25	Document Requests and Discovery E. Kwon	0.20	113.00	Set up document indexing review workflow in the discovery document repository.
B004 05/16/25	Document Requests and Discovery K. Jackson	1.00	445.00	Prepare binders of fourth production document for T. Harrison review.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B004 05/16/25	Document Requests and Discovery K. Atta-Krah	5.60	7,476.00	Research issues re discovery demands and subpoena requests (2.3); provide initial written summary (1.3); revise analysis following feedback (1.1); provide additional case analysis in response to additional feedback (.9).
B004 05/21/25	Document Requests and Discovery E. Kwon	1.60	904.00	Gather new production documents; review same for quality assurance; prepare same for review in the discovery document repository; coordinate preparing same for case development review in the repository.
B004 06/24/25	Document Requests and Discovery D. Valentino	1.00	265.00	Load incoming production set (.5); update dtSearch, production fields and search term reports (.5).
B004 06/24/25	Document Requests and Discovery E. Kwon	0.60	339.00	Coordinate preparing production documents for case development review in the discovery document repository (.2); prepare report of same (.4).
B004 06/25/25	Document Requests and Discovery E. Kwon	0.20	113.00	Assist with review of hot documents in the production documents.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B004 06/26/25	Document Requests and Discovery N. Allard	0.20	275.00	Correspond with E. Kwon re produced documents.
B004 06/26/25	Document Requests and Discovery E. Kwon	0.80	452.00	Assist with review of production documents (.3); prepare report of same (.5).
B004 07/08/25	Document Requests and Discovery E. Kwon	0.20	113.00	Assist with locating documents referenced in witness interview.
B004 08/13/25	Document Requests and Discovery E. Kwon	0.30	169.50	Coordinate production documents for case development review in the discovery document repository.
B004 08/28/25	Document Requests and Discovery E. Kwon	0.30	169.50	Prepare new production for case development review in then discovery document repository.
B006 04/29/25	General Case Administration N. Allard	1.60	2,200.00	Emails with D. Azman, K. Going, T. Harrison re case (.2); review of docket and background materials (.4); coordinate MWS team re open tasks (1.0).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 04/29/25	General Case Administration J. Lee	0.50	460.00	Correspond with N. Allard and L. Barret re case updates.
B006 04/29/25	General Case Administration J. Lee	0.90	828.00	Review precedent Examiner report (.5); email McDermott team re same (.2); confer with N. Allard re same (.2).
B006 04/29/25	General Case Administration J. Lee	0.30	276.00	Emails with J. Bishop and D. Northrop re pro hac vice and notice of appearances.
B006 04/29/25	General Case Administration K. Going	0.70	1,172.50	Strategy call with team.
B006 04/29/25	General Case Administration L. Barrett	0.60	780.00	Correspond with N. Allard, J. Lee re next steps (.5); review docket filings (.1).
B006 04/30/25	General Case Administration N. Allard	0.90	1,237.50	Review background materials (.4); call with L. Barrett, J. Lee re work plan (.5).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 04/30/25	General Case Administration L. Barrett	1.80	2,340.00	Attend call with N. Allard, J. Lee re works in progress (.5); review, analyze notice of appearance draft (.5); review, analyze documents re same (.8).
B006 04/30/25	General Case Administration J. Lee	0.50	460.00	Attend WIP Call with N. Allard and L. Barrett.
B006 04/30/25	General Case Administration J. Lee	0.70	644.00	Review NYS and appellate decision re BML judgment (.5); email K. Going, L. Barrett and N. Allard re same (.2).
B006 05/01/25	General Case Administration N. Allard	1.70	2,337.50	Prepare for internal team meeting (.3); office conference with K. Going re open tasks (.2); MWS team meeting (.5); call with L. Barrett re diligence (.2); review of same (.2); review protective orders (.3).
B006 05/01/25	General Case Administration J. Lee	0.30	276.00	Calendar critical dates (.2); confer with L. Barrett re same (.1).
B006 05/01/25	General Case Administration J. Lee	1.10	1,012.00	Attend WIP Call (.5); email McDermott team re follow up (.3); confer with K. Atta-Krah re same (.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/01/25	General Case Administration J. Lee	0.50	460.00	Email K. Going, L. Barrett and N. Allard re Duane Morris Retention and case timeline.
B006 05/01/25	General Case Administration J. Lee	0.20	184.00	Email K. Atta-Krah re WIP call.
B006 05/01/25	General Case Administration D. Azman	0.50	792.50	Discuss case strategy internally with K. Going, N. Allard et al.
B006 05/01/25	General Case Administration D. Northrop	2.20	1,628.00	Revise/finalize notice of appearance (.2); e-mail correspondence with D. Boll and MWS team regarding issues relating to finalizing and filing notice of appearance by MWS on behalf of the Examiner (.1); file notice of appearance (.2); research for precedent for applications by examiners appointed in bankruptcy cases in the District of New Jersey to retain counsel (1.6); e-mail correspondence with J. Lee regarding research results (.1).
B006 05/01/25	General Case Administration K. Going	0.50	837.50	Internal discussions re work streams.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/01/25	General Case Administration L. Barrett	0.50	650.00	Confer with MWS Team re works in progress.
B006 05/02/25	General Case Administration N. Allard	0.60	825.00	Review pleadings filed in bankruptcy and state court (.4); review pleadings filed (.2).
B006 05/02/25	General Case Administration K. Atta-Krah	0.50	667.50	Review work plan (.3).
B006 05/02/25	General Case Administration K. Going	0.60	1,005.00	Discuss WIP with team (.6).
B006 05/02/25	General Case Administration L. Barrett	0.20	260.00	Correspond with N. Allard re case procedures.
B006 05/04/25	General Case Administration J. Lee	0.70	644.00	Draft WIP list.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/04/25	General Case Administration J. Lee	1.10	1,012.00	Correspondences with MWS team re case updates (.3); email K. Atta-Krah re objection deadlines and summaries (.4); email L. Barrett re same (.2); review Examiner Appointment Order (.2).
B006 05/04/25	General Case Administration K. Atta-Krah	2.00	2,670.00	Review docket and filings in advance of background call with litigation team (.6); conduct legal and factual research and draft response regarding objections (1.4).
B006 05/04/25	General Case Administration A. Nasar	1.80	2,178.00	Review case background materials (1.1); discuss case strategy with MWS litigation team (.4); correspond with MWS team regarding same (.3).
B006 05/05/25	General Case Administration N. Allard	1.10	1,512.50	Call with MWS associates re open tasks (.5), correspond with K. Atta-Krah re materials provided (.2), review materials provided (.4).
B006 05/05/25	General Case Administration K. Atta-Krah	3.30	4,405.50	Respond to litigation team re briefing and scope of investigation (.8); identify and review precedent on scope filings and provide summary (.5); review case docket and develop agenda in advance of discussions between litigation and bankruptcy associate team (.4); coordinate work streams between litigation and bankruptcy teams (1.0); follow up with A. Nasar regarding litigation work stream (.4);



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
				coordinate document receipt and review (.2).
B006 05/05/25	General Case Administration J. Lee	0.50	460.00	Revise WIP list re N. Allard comments (.4); email N. Allard re same (.1).
B006 05/05/25	General Case Administration J. Lee	1.20	1,104.00	Review Debtors limited reply to BMLP Objection (.5); draft summary re same (.5); email McDermott team re same (.2).
B006 05/05/25	General Case Administration L. Barrett	4.50	5,850.00	Call with MWS Litigation re scope briefing (.9); review, analyze precedent scope orders (.9); correspond with N. Allard re same (.3); correspond with K. Going re same (.2); draft pleading re scope (2.2).
B006 05/05/25	General Case Administration A. Nasar	3.00	3,630.00	Correspond with MWS team re case strategy (.6); discuss with MWS associate team re same (1.3); confer with K. Atta-Krah (.3); review Debevoise document production (.8).
B006 05/05/25	General Case Administration A. Nasar	4.40	5,324.00	Review documents in aid of preparing submission on scope of examination and objection motion (2.6); research precedents regarding examiner scope (1.8).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/05/25	General Case Administration K. Going	0.30	502.50	Internal discussion on WIP.
B006 05/06/25	General Case Administration N. Allard	1.50	2,062.50	Emails with MWS litigation team (.3), Review emails with MWS re scope brief (.3), review background materials (.7), correspond with J. Lee re WIP (.2).
B006 05/06/25	General Case Administration K. Going	3.20	5,360.00	Review materials related to scope (2.6); conference with Examiner on bankruptcy proceedings (.4); internal follow up on Protective Order (.2);
B006 05/06/25	General Case Administration L. Barrett	3.20	4,160.00	Research, review, analyze precedent scope filings (1.3); draft scope briefing (1.9).
B006 05/06/25	General Case Administration A. Nasar	8.10	9,801.00	Research statutory framework and Third Circuit rulings regarding Examiner scope (2.9); review filings and court decisions of relevant precedents (3.1); review NY state court documents (2.1).
B006 05/06/25	General Case Administration J. Lee	0.20	184.00	Confer with K. Going re weekly meeting.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/06/25	General Case Administration J. Lee	3.60	3,312.00	Research re CCA prior chapter 11 (2.5); draft email memorandum re same (.8); email K. Going re same (.3).
B006 05/06/25	General Case Administration K. Atta-Krah	0.80	1,068.00	Identify docket filings related to retention of examiner (.4); preliminarily review example of examiner scope briefing (.4).
B006 05/07/25	General Case Administration D. Northrop	1.50	1,110.00	Research docket to obtain examiner-related pleadings/court filings (.5); review examiner-related pleadings/court filings (.6); assemble/organize examiner-related pleadings/court filings (.2); e-mail correspondence with K. Atta-Krah regarding same (.2).
B006 05/07/25	General Case Administration K. Atta-Krah	2.10	2,803.50	Review and analyze relevant filings on docket.
B006 05/07/25	General Case Administration K. Atta-Krah	5.00	6,675.00	Review and analyze post-trial court order and decision in NY state court action (2.7); prepare notes regarding same (1.4); research case law and identify precedent regarding examiner scope issues and function (.9).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/07/25	General Case Administration L. Barrett	3.50	4,550.00	Review, analyze documents re scope brief (1.4); draft same (1.4); correspond with K. Going re same (.2); review, analyze WIP (.4); correspond with J. Lee re WIP (.1).
B006 05/07/25	General Case Administration N. Allard	1.10	1,512.50	Review of deposition transcripts (.5) Emails with MWS re case updates (.3), correspond with J. Lee, L. Barrett re open tasks (.3).
B006 05/07/25	General Case Administration J. Lee	0.60	552.00	Revise WIP re N. Allard and L. Barrett comments (.4); email K. Going re same (.2).
B006 05/07/25	General Case Administration J. Lee	0.40	368.00	Emails with K. Attah-Krah re hearing transcripts and case docketing.
B006 05/07/25	General Case Administration J. Lee	0.70	644.00	Confer with K. Going re CCA prior chapter 11 (.2); review affidavits re same (.3); email K. Going re same (.2).
B006 05/07/25	General Case Administration K. Going	3.50	5,862.50	Review bankruptcy filings for CCA (2.2); review prior BMLP bankruptcy filing (1.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/07/25	General Case Administration A. Nasar	8.80	10,648.00	Research case law and secondary sources regarding examiners and applicable legal standards (3.1); review examiner-related filings and decisions in Silvergate and FTX (2.6); review documents rel NYS action (2.2); review May 5, 2025 Court teleconference transcript (.9).
B006 05/08/25	General Case Administration K. Atta-Krah	0.80	1,068.00	Conference with MWS team re status of scope brief and coordination re same (.8).
B006 05/08/25	General Case Administration N. Allard	0.30	412.50	Review bankruptcy court filings.
B006 05/08/25	General Case Administration N. Allard	2.30	3,162.50	Comment on draft scope statement (1.5); review further updated draft (.8).
B006 05/08/25	General Case Administration L. Barrett	5.80	7,540.00	Attend call with MWS Team re scope brief (.6); review, analyze documents re Scope Brief (1.4); draft same (3.8).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/08/25	General Case Administration K. Atta-Krah	6.70	8,944.50	Draft scope brief (2.4); confer with A. Nasar re ongoing legal research re same (.2); review and comment on legal research from A. Nasar re examiner scope precedent (.6); draft scope brief and analysis of underlying litigation (3.5).
B006 05/08/25	General Case Administration A. Nasar	3.40	4,114.00	Conference call with MWS litigation team regarding strategy (.4); conference calls with MWS associate team regarding examiner submission and strategy (.8); confer with K. Atta-Krah regarding same (.6); review/draft Examiner statement regarding scope of investigation (1.6).
B006 05/09/25	General Case Administration N. Allard	1.30	1,787.50	Correspond with L. Barrett re scope brief (.3); meet with MWS team re same (.7); review of background materials (.3).
B006 05/09/25	General Case Administration A. Nasar	6.90	8,349.00	Review Examiner statement regarding scope of investigation (2.8); review relevant documents and precedents in aid of same (3.4); correspond with MWS team regarding same (.5); confer with K. Atta-Krah regarding same (.2).
B006 05/09/25	General Case Administration K. Atta-Krah	8.90	11,881.50	Finalize initial draft of examiner scope statement (2.2); review and comment on sections of statement from bankruptcy team (.9); provide written feedback to team (.3); research Debtor company reports,



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
				corporate structure, and representation, coordinate with Library research team re same, and review results (.7); coordinate with paralegals re filing of the statement (.4); review and respond to comments and revisions in next draft of scope statement (1.9); incorporate revisions and circulate draft for partner review (2.5).
B006 05/09/25	General Case Administration L. Barrett	5.70	7,410.00	Review, analyze, revise scope statement (3.2); correspond with MWS Team re same (.4); review, analyze pleadings, precedent re same (2.1).
B006 05/09/25	General Case Administration K. Going	3.10	5,192.50	Review bankruptcy filings (2.3); review and comment on Examiner scope briefing (.8).
B006 05/10/25	General Case Administration N. Allard	0.80	1,100.00	Review updated scope brief (.5); comments to same (.3).
B006 05/10/25	General Case Administration A. Nasar	0.70	847.00	Review Examiner submission regarding scope of investigation and related revisions (.5); correspond with MWS team regarding same (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/10/25	General Case Administration K. Atta-Krah	0.60	801.00	Review and incorporate comments from T. Harrison into Examiner statement and circulate to Bankruptcy team for review.
B006 05/12/25	General Case Administration N. Allard	0.80	1,100.00	Attend WIP Call with MWS team (.6), review WIP (.2).
B006 05/12/25	General Case Administration N. Allard	0.90	1,237.50	Correspond with L. Barrett re scope brief (.4), review draft re same (.5).
B006 05/12/25	General Case Administration L. Barrett	3.80	4,940.00	Conference with MWS Team re works in progress (.6); review, analyze works in progress list (.3); research re scope briefing precedent (.8); review, analyze, revise scope brief (2.1).
B006 05/12/25	General Case Administration K. Atta-Krah	1.70	2,269.50	Conference with Examiner team re work in progress (.5); draft takeaways arising from same for Litigation team (.3); conference with A. Nasar re same (.3); review docket filings and identify questions for creditors' counsel proposed phase 1 scope (.6).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/12/25	General Case Administration A. Nasar	5.00	6,050.00	Revise Examiner submission regarding scope of investigation (2.1); review MWS team revisions to same (1.3); review documents in aid of same (1.6).
B006 05/13/25	General Case Administration J. Lee	0.60	552.00	Correspondences with N. Allard, D. Boll and D. Northrop re critical dates (.3); revise re same (.1); confer with N. Allard and L. Barrett re same (.2).
B006 05/13/25	General Case Administration J. Lee	0.20	184.00	Confer with K. Attah-Krah re docketing and critical dates.
B006 05/13/25	General Case Administration N. Allard	1.20	1,650.00	Review draft statement (.9), correspond with L. Barrett re same (.3).
B006 05/13/25	General Case Administration A. Nasar	6.10	7,381.00	Review and revise examiner submission regarding investigation scope (2.6); review precedents, filings and relevant documents in aid of same (1.7); conference call with MWS litigation team regarding same (.8); correspond with MWS team regarding same (.2); correspond and discuss with K. Atta-Krah regarding document review and strategy (.8).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/13/25	General Case Administration L. Barrett	3.50	4,550.00	Review, analyze, revise Scope brief (2.3); research re same (.8); correspond with MWS Team re same (.4).
B006 05/13/25	General Case Administration K. Atta-Krah	2.70	3,604.50	Conference with T. Harrison and A. Nasar re revisions to scoping statement (1.0); coordinate with A. Nasar and incorporate edits from same into next draft (1.2); exchange emails and coordinate revisions to draft of scoping memorandum between litigation and bankruptcy teams (.5).
B006 05/14/25	General Case Administration N. Allard	3.20	4,400.00	Review draft statement (.7), correspond with L. Barrett re same (.5), call with K. Going re research (.2), correspondence among MWS team re scope brief (.8), further correspondence with K. Going, L. Barrett re scope brief (.5), review updated drafts of same (1.0).
B006 05/14/25	General Case Administration K. Jackson	1.00	445.00	Download, circulate and file CCA brief and exhibits for team review.
B006 05/14/25	General Case Administration J. Lee	0.90	828.00	Review first day declaration and demonstratives (.5); email K. Going re same (.3); confer with N. Allard re same (.1).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/14/25	General Case Administration D. Northrop	1.90	1,406.00	Review draft of Examiner's statement regarding proposed scope of investigation (.2); e-mail correspondence with K. Atta-Krah regarding exhibits to be filed with the Examiner's statement (.1); draft/prepare certificate of service (using the local form) for Examiner's statement regarding proposed scope of investigation, including obtaining/reviewing/analyzing notice lists available from the website of the Debtor's noticing agent and assembling service lists for service by (i) ECF/e-mail and (ii) U.S. Mail (1.6).
B006 05/14/25	General Case Administration L. Barrett	6.10	7,930.00	Review, analyze, revise Scope Brief (2.6); correspond with MWS Team re same (.5); review, analyze, revise further revised Scope Brief (3.0).
B006 05/14/25	General Case Administration K. Atta-Krah	0.40	534.00	Review scope brief.
B006 05/14/25	General Case Administration A. Nasar	1.00	1,210.00	Revise examiner scope submission (.8); correspond with MWS team regarding same (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/15/25	General Case Administration K. Jackson	7.50	3,337.50	Proofread, edit and cite check CCA Examiner Statement re scope for team review and filing.
B006 05/15/25	General Case Administration N. Allard	1.10	1,512.50	Correspond with MWS team re case updates (.3), prepare and coordinate filing of Harrison declaration (.5), review pleadings filed (.3).
B006 05/15/25	General Case Administration N. Allard	5.30	7,287.50	Review updated draft scope submission (2.0); provide comments to same (.5); coordinate with L. Barrett re same (.3); review further updated statement (1.0); extensive correspondence with MWS team re finalizing same for filing (1.5).
B006 05/15/25	General Case Administration A. Nasar	3.40	4,114.00	Review and revise examiner scope submission (1.9); review NYS court action in aid of same (.4); correspond with MWS team regarding same (.6) and regarding preparations for filing (.4); discuss same with K. Atta-Krah (.1).
B006 05/15/25	General Case Administration K. Atta-Krah	2.30	3,070.50	Review post trial briefing from counsel for CCA regarding state court appeal (2.0); provide direction to paralegal re trial briefing (.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/15/25	General Case Administration D. Boll	1.10	1,518.00	Review declaration re disinterestedness (.3); confer with N. Allard and MWS team re disclosure issues (.4); contact Chambers re pro hac orders (.1); confer with D. Northrop re same (.1); review draft COS for Examiner Statement (.1); confer with D. Northrop re same (.1).
B006 05/15/25	General Case Administration L. Barrett	4.20	5,460.00	Review, analyze, revise Scope Brief (3.6); correspond with MWS Team re same (.6).
B006 05/15/25	General Case Administration K. Atta-Krah	4.80	6,408.00	Provide revised proposed language for New York findings of fact section in scope brief (.6); review next draft of same (.6); provide direction to paralegal re citations and review work product (.4); delegate and exchange emails with non-partner team re steps to finalize brief (.5); coordinate with team to respond to questions, incorporate edits, and finalize scope brief (2.7).
B006 05/16/25	General Case Administration J. Lee	1.30	1,196.00	Research re local rules (1); email team re same (.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/16/25	General Case Administration N. Allard	3.50	4,812.50	Draft declaration for filing (3.0), correspond with K. Going, J. Calandra re same (.5).
B006 05/16/25	General Case Administration N. Allard	2.00	2,750.00	Perform research related to Examiner appointment (1.5), correspond with MWS team re same (.5).
B006 05/16/25	General Case Administration K. Going	2.30	3,852.50	Review scope briefings from Debtor and BMLP.
B006 05/16/25	General Case Administration D. Boll	5.80	8,004.00	Assist J. Calandra and team with issues related to filings.
B006 05/16/25	General Case Administration D. Boll	0.20	276.00	Confer with D. Azman, K. Going, and N. Allard re pro hac orders (.1); confer with D. Northrop re same (.1).
B006 05/16/25	General Case Administration A. Nasar	5.60	6,776.00	Research case law and legal authority relating to bankruptcy context (5.3); correspond with MWS team regarding same, strategy, and document production (.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/16/25	General Case Administration L. Barrett	0.90	1,170.00	Research re burden of proof.
B006 05/16/25	General Case Administration K. Atta-Krah	1.20	1,602.00	Coordinate with paralegals regarding case file (.3); review opposition filings on scope (.9).
B006 05/17/25	General Case Administration N. Allard	2.10	2,887.50	Update draft declaration (.8), related correspondence with J. Calandra (.5), review dockets and materials (.8).
B006 05/17/25	General Case Administration L. Barrett	0.20	260.00	Review, analyze correspondence with MWS team re research.
B006 05/18/25	General Case Administration N. Allard	6.50	8,937.50	Extensive correspondence with J. Calandra and MWS team re response to Cole Schotz email and related issues (1.3); review of related materials (1.7); update draft declaration (1.2); draft other declaration (1.5); further correspondence with J. Calendar re same (.5); finalize declaration (.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/19/25	General Case Administration J. Lee	1.50	1,380.00	Attend WIP call.
B006 05/19/25	General Case Administration N. Allard	7.60	10,450.00	Draft declarations (1.0); internal correspondence re same (.5); further update draft declarations (1.0); draft Response (3.0); attend MWS team WIP call (1.5); finalize documents for filing (.6).
B006 05/19/25	General Case Administration K. Atta-Krah	4.00	5,340.00	Review filings by debtor and creditor regarding scope (1.0); advise paralegals regarding case file (.2); conference with MWS team regarding strategy (1.5); follow up regarding same (1.3).
B006 05/19/25	General Case Administration A. Nasar	1.40	1,694.00	Conference call with MWS team regarding strategy (1.4).
B006 05/19/25	General Case Administration L. Barrett	5.70	7,410.00	Research applications to appoint examiner (.4); correspond with K. Going re same (.2); review, analyze docket filings re examiner, bar date (.8); call with MWS Team re works in progress (1.0); draft timeline re examiner appointment (2.6); correspond with MWS Team re same (.7).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/20/25	General Case Administration N. Allard	0.40	550.00	Review materials filed.
B006 05/21/25	General Case Administration J. Lee	0.20	184.00	Email N. Allard re declarations.
B006 05/21/25	General Case Administration N. Allard	0.70	962.50	Review pleadings filed and case materials.
B006 05/21/25	General Case Administration K. Atta-Krah	0.20	267.00	Exchange emails with N. Allard and Gibbons firm regarding transcripts.
B006 05/21/25	General Case Administration L. Barrett	3.50	4,550.00	Research re Examiner Scope Burden (2.8); correspond with K. Going re same (.4); review, analyze agenda (.3).
B006 05/22/25	General Case Administration L. Barrett	1.30	1,690.00	Research re burden of proof issue (1.1) ; correspond with K. Going re same (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 05/23/25	General Case Administration N. Allard	0.20	275.00	Emails with D. Northrop re case, review pleadings.
B006 05/26/25	General Case Administration N. Allard	0.20	275.00	Emails with T. Harrison, D. Boll, D. Northrop re transcripts and pleadings.
B006 05/28/25	General Case Administration N. Allard	0.40	550.00	Correspond with K. Going, D. Azman, D. Boll, D. Northrop re case administration and review related materials.
B006 05/29/25	General Case Administration K. Going	0.40	670.00	Review and comment on Examiner Scope Order.
B006 05/30/25	General Case Administration N. Allard	0.30	412.50	Correspond with D. Northrup re case administration (.1), internal call with T. Harrison re case updates (.2).
B006 06/02/25	General Case Administration N. Allard	0.30	412.50	Correspond with K. Going, T. Harrison, J. Lee re case administration (.1); review pleadings filed and orders approved (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 06/02/25	General Case Administration D. Northrop	0.50	370.00	Review order approving Examiner's scope and budget for investigation, entered on 6/2/2025 (.2); e-mail correspondence with MWS team regarding entry of order (.1); communications with MWS team regarding dates and deadlines established by the Examiner scope and budget order (.2).
B006 06/03/25	General Case Administration N. Allard	0.10	137.50	Emails with D. Northrup re case administration.
B006 06/06/25	General Case Administration N. Allard	0.20	275.00	Correspond with T. Harrison re potential pleading and review of related materials (.2).
B006 06/26/25	General Case Administration N. Allard	0.20	275.00	Correspond with T. Harrison re case updates.
B006 06/27/25	General Case Administration N. Allard	0.20	275.00	Call with T. Harrison re case update.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 07/03/25	General Case Administration N. Allard	0.20	275.00	Correspond with MWS team re documents (.1), review pleadings filed (.1).
B006 07/07/25	General Case Administration N. Allard	0.10	137.50	Review of docket.
B006 07/08/25	General Case Administration N. Allard	0.20	275.00	Correspond with K. Going re case update (.1); correspond with T. Harrison re case update (.1).
B006 07/10/25	General Case Administration N. Allard	0.80	1,100.00	Email to D. Azman, T. Harrison re case updates (.2), correspond with MWS team re documents (.2), review case materials (.4).
B006 07/14/25	General Case Administration N. Allard	0.40	550.00	Review docket entries and emails re scheduling of hearing (.2); correspondences re case updates (.2).
B006 07/15/25	General Case Administration N. Allard	0.30	412.50	Correspond with internal MWS team re case updates (.2), correspond with D. Northrup re case scheduling (.1).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 07/17/25	General Case Administration N. Allard	0.30	412.50	Correspond with internal MWS team (.2); review case updates (.1).
B006 07/18/25	General Case Administration N. Allard	0.80	1,100.00	Correspond with K. Going, T. Harrison re case updates (.3).
B006 07/21/25	General Case Administration N. Allard	2.40	3,300.00	Further update draft letter and review of related materials (2.0), internal correspondence re same (.4).
B006 08/01/25	General Case Administration N. Allard	0.20	275.00	Review other case issues.
B006 08/01/25	General Case Administration D. Northrop	0.70	518.00	Review unredacted version of the report of the Special Committee of Independent Directors of CCA Construction, Inc., appendices to the report, and report transmittal letter (.3); review procedures for filing documents under seal in the U.S. Bankruptcy Court for the District of New Jersey (.2); communications with MWS team regarding new case dates and deadlines (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 08/08/25	General Case Administration N. Allard	0.10	137.50	Correspond with D. Northrup re case updates.
B006 08/08/25	General Case Administration D. Northrop	0.60	444.00	E-mail correspondence with transcriber regarding original transcript order for the 8/7/2025 hearing placed by another party and confirming the request for a copy of the transcript (.1); e-mail correspondence with N. Allard regarding same, including approximate cost of the transcript based on the transcriber's estimate of the number of pages (.2); obtain and review transcript of 8/7/2025 hearing (.2); e-mail correspondence with N. Allard regarding same (.1).
B006 08/15/25	General Case Administration N. Allard	0.70	962.50	Review BMLP filings and correspond with MWS team re same (.7).
B006 08/19/25	General Case Administration N. Allard	0.30	412.50	Review Debtor pleading filed including references to Examiner.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 08/29/25	General Case Administration D. Northrop	3.20	2,368.00	Review/analyze the Court's 6/2/2025 Scope and Budget Order for requirements relating to the filing of the Examiner's Report (.4); draft notice of filing Examiner's sealed report (.9); draft certificate of service for notice of filing of Examiner's sealed report (.3); multiple e-mail correspondence with the N. Allard regarding requirements of the Scope and Budget Order with respect to the filing/submission of the Examiner's Report (both unredacted and redacted versions), revisions to draft notice of filing of Examiner's sealed report, certificate of service for the notice of filing of Examiner's sealed report, and procedure for filing sealed documents in the New Jersey Bankruptcy Court (1.5); telephone call to the Office of the Clerk to confirm procedures for filing documents under seal in the New Jersey Bankruptcy Court (.1).
B006 09/03/25	General Case Administration N. Allard	0.30	412.50	Correspond with D. Northrop re filings and review of open case items.
B006 09/08/25	General Case Administration N. Allard	1.00	1,375.00	Review pleadings filed in CCA case.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 09/09/25	General Case Administration N. Allard	0.50	687.50	Review pleadings filed.
B006 09/11/25	General Case Administration N. Allard	0.20	275.00	Review pleadings filed.
B006 09/11/25	General Case Administration D. Northrop	0.20	148.00	Review Determination of Adjournment Request regarding motion to file Special Committee's investigation report under seal in In re CCA Construction, Inc., Case No. 24-22548 (CMG) (U.S. Bankruptcy Court for the District of New Jersey), and update case calendar.
B006 09/16/25	General Case Administration D. Northrop	0.10	74.00	Email correspondences to confirm service by first class mail of notice of filing of sealed version of the Examiner's Report on 9/15/2025 (.1).
B006 09/17/25	General Case Administration N. Allard	0.50	687.50	Review pleadings filed, case updates (.4); correspond re same with D. Northrop (.1).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 09/18/25	General Case Administration N. Allard	0.50	687.50	Review case updates and next steps with respect to report and sealing.
B006 09/19/25	General Case Administration N. Allard	0.70	962.50	Review pleadings filed.
B006 09/25/25	General Case Administration N. Allard	0.30	412.50	Correspond with other case parties re redactions of Examiner Report.
B006 09/26/25	General Case Administration N. Allard	0.20	275.00	Review case updates.
B006 09/30/25	General Case Administration N. Allard	0.30	412.50	Review pleadings filed and case updates.
B006 09/30/25	General Case Administration D. Northrop	0.10	74.00	Email correspondences with N. Allard regarding further extension of deadline to file redacted versions of the Special Committee and Examiner reports.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B006 10/02/25	General Case Administration N. Allard	0.20	275.00	Review case updates and emails from parties.
B006 10/06/25	General Case Administration N. Allard	1.50	2,062.50	Review letters and pleadings filed.
B006 10/07/25	General Case Administration N. Allard	0.40	550.00	Review pleadings filed.
B007 05/01/25	Examiner Investigation Work J. Lee	0.70	644.00	Review case background (.4); email MWS team re same (.1); confer with N. Allard re same (.2).
B007 05/05/25	Examiner Investigation Work K. Atta-Krah	2.90	3,871.50	Review initial documents from debtor's counsel and summarize same.
B007 05/06/25	Examiner Investigation Work A. Nasar	0.30	363.00	Correspond with MWS team regarding case strategy and Examiner submission.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B007 05/07/25	Examiner Investigation Work A. Nasar	0.30	363.00	Correspond with MWS team regarding examination strategy.
B007 05/08/25	Examiner Investigation Work K. Atta-Krah	0.80	1,068.00	Conference with T. Harrison and A. Nasar re debtor's investigation (.4); conference with A. Nasar re same (.4).
B007 05/09/25	Examiner Investigation Work J. Hoffman	1.10	423.50	Provide litigation background of China Construction and subsidiaries.
B007 05/09/25	Examiner Investigation Work A. Nasar	0.30	363.00	Correspond with MWS team regarding examiner strategy.
B007 05/12/25	Examiner Investigation Work A. Nasar	3.90	4,719.00	Conference call with MWS litigation team re strategy (.6); discuss same with K. Atta-Krah (.1); correspond with MWS team regarding same (.3); review documents regarding E. Abrams (1.4) and hearing transcripts (1.5).
B007 05/13/25	Examiner Investigation Work K. Atta-Krah	5.50	7,342.50	Review and respond to comments re Examiner scope (.4); review comments from T. Harrison re same (.3); review documents in preparation for conference with



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
				Litigation team to discuss strategy (.4); conference with A. Nasar re document review (.4); analyze select deposition transcripts and exhibits in support of inquiries to be addressed in scoping memorandum (3.4); research re avoidance action (.6).
B007 05/13/25	Examiner Investigation Work A. Nasar	3.20	3,872.00	Review relevant documents, filings and deposition transcripts in aid of examiner investigation.
B007 05/14/25	Examiner Investigation Work A. Nasar	10.50	12,705.00	Review deposition transcripts in aid of examiner investigation (8.1); review debtor produced documents in aid of same (1.4); discussions with K. Atta-Krah regarding review of documents, examiner investigation and strategy (1.0).
B007 05/14/25	Examiner Investigation Work K. Atta-Krah	6.60	8,811.00	Analyze transcripts from counsel's document production to develop factual record (2.5); analyze debtor documents re operations and financing (2.0); review documents and respond to K. Going re shared services (.8); conference with A. Nasar re same and next steps (.4); draft takeaways from conference with debtor's counsel (.9).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B007 05/15/25	Examiner Investigation Work A. Nasar	9.00	10,890.00	Review deposition transcripts in aid of examiner investigation (6.9); review BMLP produced documents in aid of same (2.1).
B007 05/29/25	Examiner Investigation Work N. Allard	0.20	275.00	Correspond with K. Going re investigation and background materials (.2).
B007 05/30/25	Examiner Investigation Work A. Nasar	0.40	484.00	Discuss strategy with MWS litigation team.
B007 06/09/25	Examiner Investigation Work N. Allard	1.70	2,337.50	Meet with T. Harrison re case investigation (.4); call with K. Going, T. Harrison re investigation (.5); review of background materials (.8).
B007 06/11/25	Examiner Investigation Work N. Allard	1.00	1,375.00	Correspond with K. Going, T. Harris re investigation and summarize call with Cole Schotz (.4), draft notice re budget (.6).
B007 06/12/25	Examiner Investigation Work N. Allard	0.20	275.00	Correspond with T. Harrison re case and interviews.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B007 06/18/25	Examiner Investigation Work N. Allard	0.50	687.50	Correspond with T. Harrison re investigation (.2); coordinate with MWS team (.3).
B007 06/20/25	Examiner Investigation Work N. Allard	0.40	550.00	Review of workstreams and email updates, correspond with internal MWS team re same.
B007 06/24/25	Examiner Investigation Work N. Allard	0.80	1,100.00	Correspond with T. Harrison, K. Atta-Krah, E. Kwon re productions (.3), review BMLP June 5th letter to Cole Schotz re topics for Special Committee (.3), further correspond with T. Harrison re case (.2).
B007 06/25/25	Examiner Investigation Work N. Allard	0.40	550.00	Correspond with T. Harrison re investigation items (.2), correspond with E. Kwon re productions (.2).
B007 06/26/25	Examiner Investigation Work N. Allard	0.80	1,100.00	Attend witness interview.
B007 06/30/25	Examiner Investigation Work N. Allard	0.50	687.50	Coordinate MWS team for review of documents and issues.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B007 07/01/25	Examiner Investigation Work N. Allard	1.20	1,650.00	Meet with MWS team re investigation and documents produced (.8), review of same (.4).
B007 07/07/25	Examiner Investigation Work N. Allard	0.50	687.50	Coordinate MWS review of documents and correspond with team re same.
B007 07/08/25	Examiner Investigation Work N. Allard	0.60	825.00	Correspond with MWS team re documents (.3); review of same (.3).
B007 07/09/25	Examiner Investigation Work N. Allard	0.50	687.50	Review documents produced by Special Committee.
B007 07/10/25	Examiner Investigation Work N. Allard	1.10	1,512.50	Prepare for (.2) and attend witness interview (.7), review related document request (.2).
B007 07/11/25	Examiner Investigation Work N. Allard	0.40	550.00	Review case background materials related to investigation.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B007 07/14/25	Examiner Investigation Work N. Allard	0.70	962.50	Prepare for interview by reviewing notes of witness's prior interview and related materials.
B007 07/15/25	Examiner Investigation Work N. Allard	1.40	1,925.00	Prepare for (.3) and attend witness interview (.9), review notes of same (.2).
B007 07/22/25	Examiner Investigation Work N. Allard	2.20	3,025.00	Internal correspondence re status of investigation and potential letter (.5), update same (1.3), further correspond with MWS team re investigation topics and status (.4).
B007 07/22/25	Examiner Investigation Work N. Allard	1.40	1,925.00	Correspond with T. Harrison re status of investigation and areas for further follow-up (.3), call with K. Going re same (.2) review of related materials (.6) further correspond with T. Harrison, K. Going re investigation moving forward (.3).
B007 07/23/25	Examiner Investigation Work N. Allard	4.00	5,500.00	Review materials and prepare open questions in advance of call with Cole Schotz.
B007 07/23/25	Examiner Investigation Work N. Allard	0.80	1,100.00	Call with T. Harrison, K. Going re investigation (.3); call with T. Harrison re investigation (.5).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B007 07/24/25	Examiner Investigation Work N. Allard	0.80	1,100.00	Correspond with T. Harrison re investigation (.5), correspond with other MWS team members re same (.3).
B007 07/24/25	Examiner Investigation Work N. Allard	2.50	3,437.50	Review documents produced.
B007 07/25/25	Examiner Investigation Work N. Allard	0.30	412.50	Correspond with MWS team re case updates and status of investigation.
B007 07/25/25	Examiner Investigation Work N. Allard	2.00	2,750.00	Review documents produced.
B007 09/10/25	Examiner Investigation Work N. Allard	0.10	137.50	Correspond with T. Harrison re finalizing report.
B007 09/11/25	Examiner Investigation Work N. Allard	0.20	275.00	Correspond with internal MWS team re report.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B007 09/16/25	Examiner Investigation Work N. Allard	0.50	687.50	Review filed version of Examiner Report and other case filings.
B008 04/29/25	Communications with Parties In Interest K. Going	0.60	1,005.00	CCA: Intro call with E.Weisgerber (.2); intro call with interested party (.4).
B008 05/01/25	Communications with Parties In Interest L. Barrett	1.70	2,210.00	Correspond with FA candidates re call scheduling (1.4); draft key interested parties list (.3).
B008 05/02/25	Communications with Parties In Interest K. Going	2.30	3,852.50	Prepare for (1.0) and participate in intro call with Debevoise and CS (.5); internal follow up regarding same (.8).
B008 05/02/25	Communications with Parties In Interest L. Barrett	0.40	520.00	Correspond with potential financial advisors.
B008 05/02/25	Communications with Parties In Interest N. Allard	0.60	825.00	Prepare for (.3) and attend call with Debevoise (.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B008 05/03/25	Communications with Parties In Interest L. Barrett	0.50	650.00	Analyze correspondence re FA discussions (.1); correspond with FAs re same (.2); correspond with MWS Team re same (.2).
B008 05/05/25	Communications with Parties In Interest K. Going	1.50	2,512.50	Discussions with FA candidates (1.0); call with UST regarding scope and conflict issues (.5).
B008 05/05/25	Communications with Parties In Interest K. Going	0.50	837.50	Meet with party in interest re information gathering.
B008 05/05/25	Communications with Parties In Interest L. Barrett	3.10	4,030.00	Attend conferences with financial advisors (2.0); confer with D. Azman re same (.3); review, analyze correspondence re same (.4); review, analyze financial advisor materials (.4).
B008 05/06/25	Communications with Parties In Interest N. Allard	1.00	1,375.00	Call with Gibbons, T. Harrison, K. Going.
B008 05/06/25	Communications with Parties In Interest K. Going	1.50	2,512.50	Call with BMLP team (1.0), call with UST (.5).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B008 05/06/25	Communications with Parties In Interest L. Barrett	0.30	390.00	Correspond with DIP Lender, Debtor, BMLP re Protective Order.
B008 05/07/25	Communications with Parties In Interest N. Allard	1.20	1,650.00	Draft email to Debevoise and Cole Schotz (.3), emails with Debevoise (.2), attend call with E. Weisgerber (Debevoise), T. Harrison, K. Going (.2), review and update letter to Cole Schotz (.5).
B008 05/07/25	Communications with Parties In Interest K. Going	1.60	2,680.00	Review and revise Draft Email to Debevoise/Cole Schotz regarding independent investigation (.8); discuss same with T. Harrison (.3); call with BMLP regarding factual background (.5).
B008 05/07/25	Communications with Parties In Interest L. Barrett	0.30	390.00	Call with Debtor's counsel re Protective Order.
B008 05/08/25	Communications with Parties In Interest N. Allard	0.40	550.00	Review Cole Schotz letter response to Examiner (.2), emails with Debevoise re litigation case background (.2).
B008 05/08/25	Communications with Parties In Interest L. Barrett	0.20	260.00	Correspond with PO counterparties re Protective Order.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B008 05/12/25	Communications with Parties In Interest N. Allard	0.10	137.50	Correspond with K. Atta-Krah re upcoming calls.
B008 05/14/25	Communications with Parties In Interest N. Allard	1.20	1,650.00	Call with Debevoise re background on New York litigation.
B008 05/14/25	Communications with Parties In Interest K. Atta-Krah	1.10	1,468.50	Conference with debtor's counsel regarding New York litigation.
B008 05/15/25	Communications with Parties In Interest N. Allard	1.70	2,337.50	Draft letter response to Cole Schotz (.8) and related correspondence with MWS team (.6), review and send email to UST office (.3).
B008 05/15/25	Communications with Parties In Interest K. Going	1.80	3,015.00	Internal discussion and advice regarding response to CS letter.
B008 05/16/25	Communications with Parties In Interest K. Going	1.60	2,680.00	Review and comment on responses to Debtors counsel.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B008 05/19/25	Communications with Parties In Interest N. Allard	0.30	412.50	Call with UST office, K. Going, T. Harrison.
B008 05/20/25	Communications with Parties In Interest N. Allard	0.10	137.50	Call with E. Worenklein re transcripts.
B008 05/29/25	Communications with Parties In Interest N. Allard	0.90	1,237.50	Review and provide comments to budget and scope order (.5), correspond with K. Going re same (.2), emails with case parties re comments to order (.2).
B008 05/30/25	Communications with Parties In Interest N. Allard	0.90	1,237.50	Review emails from UST and Cole Schotz re comments to order (.2), draft email response with Examiner response to update proposed order (.4), correspond with T. Harrison, K. Going re same (.3).
B008 06/01/25	Communications with Parties In Interest N. Allard	0.20	275.00	Review email updates from D. Harris of Cole Schotz.
B008 06/10/25	Communications with Parties In Interest N. Allard	0.10	137.50	Correspond with T. Harris re upcoming call with S. Klepper.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B008 06/11/25	Communications with Parties In Interest N. Allard	0.30	412.50	Call with T. Harrison, S. Klepper, D. Harris.
B008 06/27/25	Communications with Parties In Interest N. Allard	0.20	275.00	Correspond with Cole Schotz team re notice.
B008 06/30/25	Communications with Parties In Interest N. Allard	0.40	550.00	Correspond with D. Harris re stipulation and order (.2), review of same (.2).
B008 07/01/25	Communications with Parties In Interest N. Allard	0.70	962.50	Review updated draft notice and correspond with Cole Schotz, MWS teams re same.
B008 07/02/25	Communications with Parties In Interest N. Allard	0.10	137.50	Emails with Cole Schotz, Duane Morris re application to increase budget.
B008 07/03/25	Communications with Parties In Interest N. Allard	0.20	275.00	Review email from Cole Schotz (.1) Emails with F. Steele, T. Harrison re case issues (.1).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B008 07/07/25	Communications with Parties In Interest N. Allard	0.20	275.00	Call with F. Steele, T. Harrison re case updates.
B008 07/08/25	Communications with Parties In Interest N. Allard	0.10	137.50	Email with D. Harris re case update.
B008 07/10/25	Communications with Parties In Interest N. Allard	0.10	137.50	Emails with Cole Schotz re interviews.
B008 07/11/25	Communications with Parties In Interest N. Allard	0.50	687.50	Review email from chambers and emails with parties re scheduling, related internal emails with MWS team re same.
B008 07/14/25	Communications with Parties In Interest N. Allard	0.40	550.00	Review emails with Cole Schotz re upcoming interviews (.1), review email from Cole Schotz and related emails with MWS team re extending Special Committee report deadline (.3).
B008 07/15/25	Communications with Parties In Interest N. Allard	0.30	412.50	Email correspondence with other parties re Special Committee request to extend report deadline (.2), correspond with D. Harris re hearing date and pleadings (.1).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B008 07/18/25	Communications with Parties In Interest N. Allard	3.70	5,087.50	Draft letter to Cole Schotz (2.7) including review of related materials (1.0).
B008 07/22/25	Communications with Parties In Interest N. Allard	0.10	137.50	Emails with Cole Schotz re upcoming calls (.1).
B008 07/24/25	Communications with Parties In Interest N. Allard	1.70	2,337.50	Call with Cole Schotz (.2), prepare for same with list of open questions and review of related materials (1.5).
B008 07/28/25	Communications with Parties In Interest N. Allard	1.20	1,650.00	Draft email to Cole Schotz re report.
B008 07/31/25	Communications with Parties In Interest N. Allard	0.10	137.50	Correspond with D. Harris re timing of Report and other filings.
B008 08/04/25	Communications with Parties In Interest N. Allard	0.10	137.50	Correspond with Cole Schotz re documents to be produced.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B008 08/06/25	Communications with Parties In Interest N. Allard	1.20	1,650.00	Review BMLP letter and related issues (.5), review emails from Gibbons and Cole Schotz re upcoming hearing and draft email to Cole Schotz re same (.5), review further emails among parties in advance of hearing (.2).
B008 08/13/25	Communications with Parties In Interest N. Allard	0.40	550.00	Review email from C. Schotz re additional documents produced and internal correspondence with MWS team re same (.2), correspond with D. Harris re case updates (.2).
B008 08/25/25	Communications with Parties In Interest N. Allard	0.50	687.50	Correspond with Cole Schotz re materials produced (.2), internal correspondence with K. Going, T. Harrison re same (.3).
B008 08/28/25	Communications with Parties In Interest N. Allard	0.20	275.00	Correspond with Cole Schotz re production of meeting minutes (.2).
B008 09/09/25	Communications with Parties In Interest N. Allard	0.20	275.00	Correspond with D. Harris re case filings.
B008 09/11/25	Communications with Parties In Interest N. Allard	0.10	137.50	Correspond with D. Harris re case items.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B008 09/15/25	Communications with Parties In Interest N. Allard	0.20	275.00	Draft and send email to parties re final report.
B008 09/19/25	Communications with Parties In Interest N. Allard	0.50	687.50	Correspond with other parties re redactions.
B008 09/22/25	Communications with Parties In Interest N. Allard	1.50	2,062.50	Correspond with parties regarding redactions and other case items (1.0); further correspond with E. Worenklein re same (.5).
B008 09/24/25	Communications with Parties In Interest N. Allard	0.50	687.50	Correspond with other case parties re unredacted version of report (.3), correspond with D. Northrop re notice of filing and review of same (.2).
B008 09/29/25	Communications with Parties In Interest N. Allard	0.80	1,100.00	Correspond with other parties re redactions and review of same.
B008 10/01/25	Communications with Parties In Interest N. Allard	0.30	412.50	Review emails from other parties re redactions to Examiner report and review of redactions.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B008 10/03/25	Communications with Parties In Interest N. Allard	0.20	275.00	Correspond with E. Worenklein and others re filing redacted reports.
B008 10/06/25	Communications with Parties In Interest N. Allard	0.50	687.50	Correspond with Debevoise team and other parties re redactions in publicly filed versions of Special Committee report and Examiner report.
B008 10/07/25	Communications with Parties In Interest N. Allard	0.20	275.00	Correspond with Cole Schotz re upcoming hearing.
B008 10/20/25	Communications with Parties In Interest N. Allard	0.10	137.50	Correspond with D. Harris re hearing schedule.
B009 05/07/25	Billing and Fee Applications L. Barrett	1.80	2,340.00	Review, analyze filed fee statements (1.5); correspond with K. Going re same (.3).
B009 05/08/25	Billing and Fee Applications J. Lee	1.40	1,288.00	Draft billing memorandum (1.1); confer with L. Barrett re same (.2); email L. Barrett re same (.1).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B009 05/09/25	Billing and Fee Applications J. Lee	0.70	644.00	Review billing memorandum (.5); email MWS team re same (.2).
B009 06/12/25	Billing and Fee Applications N. Allard	0.20	275.00	Review draft invoice.
B009 06/27/25	Billing and Fee Applications N. Allard	1.20	1,650.00	Review updated draft notice (.2), correspond with D. Azman, K. Going, T. Harrison re same (.5), review issues relating to draft notice (.5).
B009 06/30/25	Billing and Fee Applications N. Allard	0.20	275.00	Correspond with T. Harrison, D. Azman, K. Going re stipulation.
B009 07/09/25	Billing and Fee Applications N. Allard	0.90	1,237.50	Review BMLP objection to stipulation (.4); review of related materials (.3); correspond with MWS team re same (.2).
B009 07/14/25	Billing and Fee Applications N. Allard	1.00	1,375.00	Draft response to BMLP objection (1.0).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B009 07/15/25	Billing and Fee Applications N. Allard	1.10	1,512.50	Draft response to BMLP objection re budget (1.0), correspond with K. Going re same and other case items (.1).
B009 07/17/25	Billing and Fee Applications N. Allard	0.30	412.50	Review draft response to BMLP objection.
B009 07/23/25	Billing and Fee Applications N. Allard	0.60	825.00	Update draft response to BMLP objection.
B009 07/30/25	Billing and Fee Applications N. Allard	0.60	825.00	Update draft response (.4), correspond with K. Going re same (.2).
B009 07/30/25	Billing and Fee Applications K. Going	1.40	2,345.00	Review draft of Examiner's response to BMLP Objection.
B009 07/31/25	Billing and Fee Applications N. Allard	1.00	1,375.00	Update draft response per comments received (.4), finalize same for filing (.3), correspond with MWS team re same (.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B009 07/31/25	Billing and Fee Applications K. Going	0.80	1,340.00	Review and revise Examiner Response to BMLP Objection (.6); confer with N. Allard re same (.2).
B009 08/01/25	Billing and Fee Applications N. Allard	1.20	1,650.00	Review and finalize pleading for filing (.5); correspond with D. Northrup re same (.4); review Debtor reply (.3).
B009 08/01/25	Billing and Fee Applications D. Northrop	1.80	1,332.00	Revise Examiner's limited response to BML Properties, Ltd.'s objection to application in lieu of motion in support of entry of stipulation and consent order regarding budget for the authorized investigation of the Examiner (.2); draft/prepare certificate of service for Examiner's limited response (.3); update service list (.4); further revise and finalize Examiner's limited response for filing on the ECF case docket (.2); file same on the ECF case docket (.3); coordinate service of the Examiner's limited response (.4).
B009 08/20/25	Billing and Fee Applications N. Allard	0.40	550.00	Review requirements related to filing of final fee application.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B009 08/25/25	Billing and Fee Applications J. Lee	1.30	1,196.00	Research precedent re final fee application (1.0); correspondences with N. Allard re same (.3).
B009 08/26/25	Billing and Fee Applications J. Lee	3.10	2,852.00	Draft fee application (2.1); research re further precedent (.4); review local rules for compliance (.3); correspondences with MWS document team re same (.3).
B009 08/27/25	Billing and Fee Applications J. Lee	1.90	1,748.00	Draft fee application.
B009 08/29/25	Billing and Fee Applications J. Lee	1.00	920.00	Draft fee application.
B009 09/04/25	Billing and Fee Applications J. Lee	0.20	184.00	Confer with N. Allard re final fee application precedent.
B009 09/04/25	Billing and Fee Applications N. Allard	1.00	1,375.00	Review fee statement for compliance w/ UST guidelines.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B009 09/29/25	Billing and Fee Applications N. Allard	1.50	2,062.50	Review invoice for compliance w/ UST guidelines.
B009 09/30/25	Billing and Fee Applications N. Allard	4.00	5,500.00	Review invoices for fee applications for compliance w/ UST guidelines.
B009 10/01/25	Billing and Fee Applications N. Allard	2.00	2,750.00	Review invoice for compliance with UST guidelines.
B009 10/03/25	Billing and Fee Applications N. Allard	0.40	550.00	Review invoice for compliance with UST guidelines.
B009 10/07/25	Billing and Fee Applications N. Allard	1.50	2,062.50	Review invoice for compliance with UST guidelines.
B009 10/15/25	Billing and Fee Applications J. Lee	1.00	920.00	Review invoice for compliance with UST guidelines.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B009 10/20/25	Billing and Fee Applications N. Allard	0.10	137.50	Correspond with D. Azman re fee application.
B009 10/30/25	Billing and Fee Applications N. Allard	1.00	1,375.00	Correspond with MWS team re final fee application and review of related items.
B009 10/31/25	Billing and Fee Applications N. Allard	0.80	1,100.00	Correspond with J. Lee re fee statements (.3); review of related issues re same (.5).
B010 05/01/25	Retention Work J. Lee	1.50	1,380.00	Draft summary re Duane Morris Retention and BML limited Objection (1.2); confer with N. Allard re same (.3).
B010 05/01/25	Retention Work D. Boll	0.80	1,104.00	Review Notice of Appearance (.2); confer with D. Northrop and J. Lee re same (.1); confer with J. Lee and D. Northrop re pro hac vice motions (.2); review PHV and local rules (.3).
B010 05/02/25	Retention Work D. Boll	1.40	1,932.00	Revise pro hac vice applications, certifications, and orders for K. Going, N. Allard, and D. Azman (1.2); confer with J. Lee and D. Northrop re same (.2).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B010 05/02/25	Retention Work J. Bishop Jones	1.00	355.00	Communications with J. Lee (.2); revise D. Azman, K. Going, and N. Allard Pro Hacs and certifications (.8).
B010 05/04/25	Retention Work J. Lee	1.00	920.00	Correspondences with D. Boll re retention application (.4); research re retention applications (.6).
B010 05/05/25	Retention Work N. Allard	0.20	275.00	Correspond with J. Lee re retention application.
B010 05/06/25	Retention Work D. Boll	0.30	414.00	Confer with D. Azman and K. Going re retention application and billing categories (.1); review issues re same (.1); confer with D. Wilder re same (.1).
B010 05/06/25	Retention Work J. Lee	1.00	920.00	Review firm disclosures (.2); draft email re same (.4); revise re L. Barrett comments (.2); email D. Azman re same (.2).
B010 05/08/25	Retention Work J. Lee	0.30	276.00	Review retention application precedent.



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B010 05/09/25	Retention Work J. Lee	3.30	3,036.00	Review conflicts disclosures re retention application (2); draft disclosure exhibit re same (1.3).
B010 05/09/25	Retention Work J. Lee	3.00	2,760.00	Draft retention application (2.0); analyze work plan re same (1.0).
B010 05/15/25	Retention Work N. Allard	0.40	550.00	Review draft retention application.
B010 05/15/25	Retention Work J. Lee	4.50	4,140.00	Revise retention application (1.0); review conflicts (.7); draft disclosure exhibits re same (2); emails with D. Boll and N. Allard re same (.3); Call with N. Allard re same (.3); email K. Going re same (.2).
B010 05/15/25	Retention Work D. Boll	2.30	3,174.00	Edit and revise MWS retention application (1.3); review conflicts reports for same (.8); confer with J. Lee re same (.2).
B010 05/16/25	Retention Work J. Lee	0.70	644.00	Revise retention application (.4); email D. Boll, K. Going and N. Allard re same (.3).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B010 05/16/25	Retention Work K. Going	3.50	5,862.50	Review and comment on retention application (1.3); review connections information and internal discussions regarding same (2.2).
B010 05/21/25	Retention Work J. Lee	2.90	2,668.00	Confer with K. Going re retention application (.2); revise retention application re K. Going comments (2.4); email D. Boll re same (.3).
B010 05/21/25	Retention Work N. Allard	0.30	412.50	Correspond with D. Boll, J. Lee re retention application.
B010 05/21/25	Retention Work D. Northrop	0.90	666.00	Review draft of MWS retention application (.1); review local rules governing applications to retain and employ professional persons (.1); e-mail correspondence with MWS team regarding proposed revisions to retention application (.1); draft certificate of service re same (.2); update service list for MWS retention application (.2); preparations for service of MWS retention application (.2).
B010 05/21/25	Retention Work D. Boll	2.40	3,312.00	Work on retention application (2.3); confer with team re same (.1).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B010 05/22/25	Retention Work L. Barrett	2.90	3,770.00	Review, analyze, revise retention application (2.5); correspond with MWS Team re same (.4).
B010 05/22/25	Retention Work J. Lee	0.30	276.00	Correspondences with L. Barrett and N. Allard re retention application.
B010 05/22/25	Retention Work N. Allard	2.50	3,437.50	Prepare retention application for filing (1.5), correspond with K. Going, D. Boll, L. Barrett re same (1.0).
B010 05/22/25	Retention Work D. Boll	1.60	2,208.00	Confer with N. Allard re retention application (.2); revise re same (1.4).
B010 05/22/25	Retention Work D. Northrop	1.90	1,406.00	Review draft of MWS retention application (.4); revise re same (.3); multiple e-mail correspondence with N. Allard, D. Boll and other MWS team members regarding revisions and issues relating to filing same (.4); finalize and prepare to file MWS retention application and related certificate of service for filing on the ECF case docket (.2); file MWS retention application and related certificate of service on the ECF case docket (.3); coordinate



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
				service of MWS retention application (.3).
B010 06/02/25	Retention Work D. Northrop	0.10	74.00	Review order approving Examiner's retention of McDermott as counsel, and e-mail correspondence with MWS team regarding same.
B010 08/16/25	Retention Work D. Northrop	0.40	296.00	Revise supplemental Going declaration in support of the Examiner's application to retain and employ MWS as counsel.
B010 09/02/25	Retention Work D. Boll	0.30	414.00	Review supplemental disclosure affidavit re potential conflicts post-merger (.2); confer with D. Northrop re same (.1).
B010 09/02/25	Retention Work D. Northrop	0.90	666.00	Prepare supplemental Going declaration in support of application of the Court-appointed Examiner to retain and employ McDermott as counsel disclosing additional connections to parties in interest as a result of McDermott's recent business combination (.9).



Mr. Todd Harrison

Client: 126965
 Invoice: 4062797
 Invoice Date: 11/06/2025

Task / Date	Desc. / Name	Hours	Amount	Description
B010 09/03/25	Retention Work D. Northrop	0.80	592.00	Draft/prepare certificate of service for supplemental Going declaration in support of application of the Court-appointed Examiner to retain and employ McDermott as counsel disclosing additional connections to parties in interest as a result of McDermott's recent business combination (.2); finalize supplemental Going declaration and related certificate of service for filing on the ECF case docket (.1); file supplemental Going declaration and certificate of service on the ECF case docket (.3); coordinate service of the supplemental Going declaration (.2).
Total Hours		812.60	Total For Services	\$1,111,216.00

Task Code Summary

Task Code	Description	Hours	Amount
B001	Examiner Time	123.60	241,020.00
B002	Court Hearings	43.30	54,863.50
B003	Report Preparation and Drafting	102.40	137,367.50
B004	Document Requests and Discovery	56.80	64,714.50
B006	General Case Administration	287.00	359,868.00
B007	Examiner Investigation Work	73.20	94,007.00
B008	Communications with Parties In Interest	45.50	65,451.00
B009	Billing and Fee Applications	37.40	45,984.00
B010	Retention Work	43.40	47,940.50
		812.60	1,111,216.00



Mr. Todd Harrison

Client: 126965
Invoice: 4062797
Invoice Date: 11/06/2025

Total This Invoice \$1,111,216.00



Mr. Todd Harrison
Invoice: 4062797

11/06/2025

Timekeeper Summary

Name	Rank	Hours	Rate	Amount
D. Azman	Partner	0.50	1,585.00	792.50
K. Going	Partner	45.70	1,675.00	76,547.50
T. Harrison	Partner	123.60	1,950.00	241,020.00
K. Atta-Krah	Associate	84.60	1,335.00	112,941.00
L. Barrett	Associate	85.80	1,300.00	111,540.00
J. Lee	Associate	58.90	920.00	54,188.00
A. Nasar	Associate	100.10	1,210.00	121,121.00
N. Allard	Counsel	241.00	1,375.00	331,375.00
D. Boll	Counsel	22.70	1,380.00	31,326.00
J. Bishop Jones	Paralegal	1.00	355.00	355.00
K. Jackson	Paralegal	14.00	445.00	6,230.00
D. Northrop	Paralegal	26.70	740.00	19,758.00
E. Kwon	Other	5.90	565.00	3,333.50
D. Valentino	Other	1.00	265.00	265.00
J. Hoffman	Administrative	1.10	385.00	423.50
Total		812.60		\$1,111,216.00

Exhibit H

Proposed Order

**UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW
JERSEY**

**Caption in Compliance with D.N.J. LBR
9004- 1(b)**

MCDERMOTT WILL & SCHULTE LLP

Darren Azman (admitted *pro hac vice*)
Kristin K. Going (admitted *pro hac vice*)
Deanna D. Boll (NJ Bar No. 031861998)
Nathaniel Allard (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: (212) 547-5400
Facsimile: (212) 547-5444
dazman@mcdermottlaw.com
kgoing@mcdermottlaw.com
dboll@mcdermottlaw.com
nallard@mcdermottlaw.com

Counsel to the Examiner

In re:

CCA Construction, Inc.,¹

Debtor.

Case No. 24-22548 (CMG)

Chapter 11

Judge: Christine M. Gravelle

¹ The last four digits of the Debtor's federal tax identification number are 4864. The Debtor's service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.

(Page | 1)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

**ORDER GRANTING THE FIRST & FINAL APPLICATION OF
MCDERMOTT WILL & SCHULTE LLP AS COUNSEL TO
THE EXAMINER FOR ALLOWANCE OF COMPENSATION FOR THE
PERIOD FROM APRIL 29, 2025 THROUGH AND INCLUDING OCTOBER 31, 2025**

The relief set forth on the following pages, numbered two (2) through three (3), is
ORDERED.

(Page | 2)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

Upon the consideration of the final application (the “Application”)¹ of McDermott Will & Schulte (“McDermott”) as counsel to Todd Harrison, as Court-appointed Examiner (the “Examiner”) in the above-captioned Chapter 11 case (the “Chapter 11 Case”) of CCA Construction, Inc. (the “Debtor”) for allowance on a final basis of compensation to McDermott for the period from April 29, 2025 through and including October 31, 2025 (the “Compensation Period”); and upon consideration of the declaration of Darren Azman (the “Azman Declaration”), which is attached to the Application as **Exhibit A**; pursuant to Bankruptcy Code sections 105(a), 327 and 330 of the, Bankruptcy Rules 2014(a) and 2016, Local Rule 2014-1, and the Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases (the “Guidelines”); 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* as amended on September 18, 2012 (Simandle, C.J.); and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having reviewed the Application and the Azman Declaration; and the Court being satisfied based on the representations made in the Application and the Azman Declaration that (a) McDermott does not hold or represent an interest adverse to CCA’s estate and (b) McDermott is a “disinterested person” as defined in section 101(14) of the Bankruptcy Code; and it appearing to the Court that the relief

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

(Page | 3)

Debtor: CCA Construction, Inc.

Case No.: 24-22548 (CMG)

requested is in the best interests of CCA's estate, its creditors, and other parties in interest; and notice of the Application appearing to be adequate and appropriate under the circumstances; and any objections to the requested relief having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Application is **GRANTED** to the extent set forth herein.
2. McDermott is awarded, on a final basis, compensation for professional services rendered to the Examiner during the Compensation Period in the amount of \$500,000.
3. The Debtor is authorized and directed to remit payment to McDermott in the amount of \$500,000.
4. Notwithstanding any procedural rule to the contrary, this Order shall become effective and enforceable immediately on its entry.
5. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
6. The Court retains jurisdiction of any matter arising from or relating to this Order or its interpretation, implementation, or enforcement.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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

MCDERMOTT WILL & SCHULTE LLP
Darren Azman (admitted pro hac vice)
Deanna D. Boll (NJ Bar No. 031861998)
Nathaniel Allard (admitted pro hac vice)
One Vanderbilt A venue
New York, New York 10017-3852
Telephone: (212) 547-5400
dazman@mcdermottlaw.com;
dboll@mcdermottlaw.com
nallard@mcdermottlaw.com

In Re:

CCA Construction, Inc.,

Debtor.

Case No.: 24-22548

Chapter: 11

Adv. No.: N/A

Hearing Date: N/A

Judge: Christine M. Gravelle

CERTIFICATION OF SERVICE

1. I, Deanna D. Boll :
 - represent Todd Harrison, Examiner in this matter.
 - am the secretary/paralegal for _____, who represents _____ in this matter.
 - am the _____ in this case and am representing myself.

 2. On March 16, 2026, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.

First and Final Application of McDermott Will & Schulte LLP as Counsel to the Examiner for Allowance of Compensation for the Period from April 29, 2025 through and including October 31, 2025

 3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.
- Date: 3/16/2026 /s/ Deanna D. Boll
Signature

Description	Creditor Name	Creditor Notice Name	Email Address
Top 20 Creditor	American International Companies	Lanlan Chen	Lanlan.chen@wtw.com
Top 20 Creditor	BML Properties, Ltd	Dorf Nelson & Zauderer LLP	Mzauderer@dorflaw.com
Top 20 Creditor	BML Properties, Ltd	Susman Godfrey LLP	bcarmody@susmangodfrey.com; Jbuchdahl@susmangodfrey.com
Counsel for Plaza Construction Group Florida, LLC	Carlton Fields P.A.	Julia E. Duffy Michael T. Hensley	jduffy@carltonfields.com mhensley@carltonfields.com
Debtor	CCA Construction, Inc.	c/o BDO USA, P.C.	JSchwarz@bdo-ba.com
Debtor	CCA Construction, Inc.		
	Certain Non-Debtor Affiliates of CCA Construction, Inc.	Shella Borovinskaya	sborovinskaya@ycst.com
		Michael D. Sirota, Warren A. Usatine, Felice R. Yudkin, Ryan T. Jareck	msirota@coleschotz.com; wusatine@coleschotz.com; fyudkin@coleschotz.com; rjareck@coleschotz.com
Local Counsel for the Debtor	Cole Schotz P.C.		
Top 20 Creditor	Counsel Press, Inc.		bwhite@counselpress.com
Top 20 Creditor	Crum & Forster A Fairfax Company	Lanlan Chen	Lanlan.chen@wtw.com
Top 20 Creditor	CSC		nataasha.evans@cscglobal.com
		M. Natasha Labovitz, Sidney P. Levinson, Elie J. Worenklein, Rory B. Heller	nlabovitz@debevoise.com; slevinson@debevoise.com; eworenklein@debevoise.com; rbheller@debevoise.com
Counsel for the Debtor	Debevoise & Plimpton LLP		
Top 20 Creditor	Euler Hermes North America Insurance Company	Lanlan Chen	Lanlan.chen@wtw.com
Top 20 Creditor	FTI Consulting, Inc.		kern.nandan@fticonsulting.com
		Robert K. Malone, Brett S. Theisen, Kyle P. McEvilly, and Christopher P. Anton	rmalone@gibbonslaw.com; btheisen@gibbonslaw.com; kmcevilly@gibbonslaw.com; canton@gibbonslaw.com
Counsel for BML Properties, Ltd.	Gibbons P.C.		
Top 20 Creditor	Graphite Engineering LTD.	Baycourt Law Chambers	cfrancis@baycourtlaw.com
IRS	Internal Revenue Service	Attn Susanne Larson	SBSE.Insolvency.Balt@irs.gov
Top 20 Creditor	Kelly Mac Interiorscapes Inc.		tammi@kellymacplants.com
		Andrew Behlmann, Nicole Fulfree and Michael A. Kaplan	abehlmann@lowenstein.com; nfulfree@lowenstein.com; mkaplan@lowenstein.com
Counsel to the DIP Lender / CSCEC Holding Company, Inc.	Lowenstein Sandler LLP		
Counsel to the DIP Lender / CSCEC Holding Company, Inc.	Lowenstein Sandler LLP	Jeffrey L. Cohen	jcohen@lowenstein.com
Top 20 Creditor	LYTTC, Inc.		judyhugh12@gmail.com
			tthompson@pdtlegal.com; mlewis@pdtlegal.com;
Top 20 Creditor	Marina Pointe East Developer, LLC	Paskert Diver Thompson	rgraham@pdtlegal.com
			Fran.B.Steele@usdoj.gov; Savanna.Bierne1@usdoj.gov USTPRegion03.NE.ECF@usdoj.gov
U.S. Trustee for the District of New Jersey	Office of the United States Trustee for the District of New Jersey	Fran B. Steele and Savanna J. Bierne	
Top 20 Creditor	Pillsbury Winthrop Shaw	Pittman LLP	geoffrey.sant@pillsburylaw.com
Top 20 Creditor	Quench USA, Inc.		collections@quenconline.com
Top 20 Creditor	Quill Corporation		orders@quill.com
			bankruptcynoticeschr@sec.gov; nyrobankruptcy@sec.gov
SEC Regional Office	Securities & Exchange Commission	NY Regional Office	
SEC Regional Office	Securities & Exchange Commission	PA Regional Office	philadelphia@sec.gov
Top 20 Creditor	Socotec Advisory LLC		advisorybilling@socotec.us
	Special Committee of Independent Directors	Morris S. Bauer	MSBauer@duanemorris.com
Top 20 Creditor	Squire Patton Boggs		michael.curto@squirepb.com
Top 20 Creditor	Swiss Re Corporate Solutions	Lanlan Chen	Lanlan.chen@wtw.com
		Courtney M. Brown and Michael L. Schein	mschein@vedderprice.com; cmbrown@vedderprice.com
Counsel to Korcomptenz Inc	Vedder Price P.C.		