Case 24-11161-BLS Doc 881 Filed 08/07/25 Page 1 of 12 Docket #0881 Date Filed: 08/07/2025

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
III IC.	Chapter 11

SAGA FORMATIONS, INC., et al., 1 Case No. 24-11161 (BLS)

Debtors. (Jointly Administered)

Obj. Deadline: August 28, 2025, at 4:00 p.m. ET

TENTH MONTHLY APPLICATION
OF JENNER & BLOCK LLP AS COUNSEL TO THE
CHAPTER 11 TRUSTEE, FOR ALLOWANCE OF MONTHLY
COMPENSATION AND FOR MONTHLY REIMBURSEMENT OF ALL
ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD OF
JULY 1, 2025 THROUGH AND INCLUDING JULY 31, 2025

Name of Applicant: JENNER & BLOCK LLP

Authorized to Provide Professional Services Claudia Z. Springer, Esq. as Chapter 11 Trustee

to:

Date of Retention: October 28, 2024 nunc pro tunc to September 23,

2024

Monthly Period for which Compensation

and reimbursement is sought:

July 1, 2025 through and including July 31, 2025

Amount of monthly compensation sought as

actual, reasonable, and necessary:

\$326,755.00 (80% of which is \$261,404.00)

Amount of monthly expense reimbursement sought as actual, reasonable, and necessary:

\$18,086.16

This is a <u>x</u> monthly final application

<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758), and Tangible Play, Inc. (9331).



The total time expended for the fee application preparation is approximately 3.5 hours and the corresponding compensation requested is approximately \$4,900.00.

If this is not the first application filed, disclose the following for each prior application:

DATE FILED	PERIOD COVERED	REQUESTED FEES/EXPENSES	APPROVED FEES/EXPENSES
First Monthly (D.I. 282) 11/14/24 CNO (D.I. 374) 12/6/24	9/23/24 to 10/31/24	\$877,843.00 in Fees \$42,258.08 in Expenses	\$877,843.00 in Fees \$42,258.08 in Expenses
Second Monthly (D.I. 371) 12/5/24 CNO (D.I. 422) 12/27/24	11/1/24 to 11/30/24	\$902,354.50 in Fees \$8,719.47 in Expenses	\$902,354.50 in Fees \$8,719.47 in Expenses
First Interim (D.I. 457, 458) 1/17/25 Order (D.I. 531) 2/21/25	9/23/24 to 11/30/24	\$1,780,197.50 in Fees \$50,977.55 in Expenses	\$1,780,197.50 in Fees \$50,977.55 in Expenses
Third Monthly (D.I. 451) 01/14/25 CNO (D.I. 502) 2/5/25	12/1/24 to 12/31/24	\$315,060.50 in Fees \$3,900.24 in Expenses	\$252,048.40 in Fees \$3,900.24in Expenses
Fourth Monthly (D.I. 513) 2/11/25 CNO (D.I. 553) 3/5/25	01/1/25 to 1/31/25	\$944,951.50 in Fees \$3,556.91 in Expenses	\$755,961.20 in Fees \$3,556.91 in Expenses
Fifth Monthly (D.I. 557) 03/10/25 CNO (D.I. 604) 4/1/25	02/1/25 to 2/28/25	\$1,021,050.50 in Fees \$258,082.55 in Expenses	\$816,840.40 in Fees \$258,082.55 in Expenses
Second Interim (D.I. 605, 606) 4/1/25 Order (D.I. 659) 4/28/25	12/1/24 to 2/28/25	\$2,281,062.50 in Fees \$265,539.70 in Expenses	\$2,281,062.50 in Fees \$265,539.70 in Expenses
Sixth Monthly (D.I. 628) 4/11/25 CNO (D.I. 670) 5/5/25	03/1/25 to 3/31/25	\$1,900,413.50 in Fees \$306,567.69 in Expenses	\$1,900,413.50 in Fees \$306,567.69 in Expenses

DATE FILED	PERIOD COVERED	REQUESTED FEES/EXPENSES	APPROVED FEES/EXPENSES
Seventh Monthly (D.I. 741) 5/22/25 CNO (D.I. 769) 6/13/25	4/1/25 to 4/30/25	\$1,726,902 in Fees \$13,993.84 in Expenses	\$1,726,902 in Fees \$13,993.84 in Expenses
Eighth Monthly (D.I. 771) 6/13/25 CNO (D.I. 819) 7/8/25	5/1/25 to 5/31/25	\$1,992,930.00 in Fees \$90,734.42 in Expenses	\$1,992,930.00 in Fees \$90,734.42 in Expenses
Third Interim (D.I. 795) 6/23/25 Order (D.I. 841) 7/17/25	3/1/25 to 5/31/25	\$5,620,245.50 in Fees \$411,295.95 in Expenses	\$5,620,245.50 in Fees \$411,295.95 in Expenses
Ninth Monthly (D.I. 827) 7/10/25 CNO (D.I. 864) 8/1/25	6/1/25 to 6/30/25	\$442,788.50 in Fees \$143,544.80 in Expenses	\$442,788.50 in Fees \$143,544.80 in Expenses

## MONTHLY COMPENSATION BY PROFESSIONAL

Saga Formations, Inc. et al. (Case No. 24-11161 (BLS)) July 1, 2025, through and including July 31, 2025

Name of Professional	Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice	Hourly Rate	Total Billed Hours	Total Compensation
Catherine L. Steege  Partner /Bankruptcy. Partner since 1990. Joined the firm as an associate in 1982. Admitted to IL bar in 1982		\$2,345	46.5	\$109,042.50
Geoffrey M. Davis	Partner /Tax. Joined the firm as a partner in 2003. Admitted to IL bar in 1992.	\$2,235	3.4	\$7,599.00
Matthew J. Renaud	Partner/Employee Benefits. Joined the firm as an associate in 1992. Admitted to the IL bar in 1992.	\$1,785	11.5	\$20,527.50
Peter H. Rosenbaum	Partner/Corporate. Partner since 2013. Joined the firm as an associate in 2005. Admitted to IL bar in 2005.	\$1,730	4.1	\$7,093.00
Anna Meresidis	Partner/Corporate. Partner since 2018. Joined the firm as special counsel in 2017. Admitted to NY bar in 2004. Admitted to IL bar in 2008.	\$1,620	0.2	\$ 324.00
Partner/Bankruptcy. Partner 2011. Joined the firm as an Amelissa M. Root associate in 2005. Admitted bar in 2006. Admitted to IN in 2003.		\$1,575	71.5	\$112,612.50
Jenna A. Bressel	Special Counsel/Employee Benefits. Joined the firm as a Special Counsel in 2025. Admitted to the IL bar in 2017.	\$1,540	4.3	\$6,622.00
Sharon K. Moraes	Special Counsel/Corporate. Joined the firm as an associate in 2017. Admitted to IL Bar in 2017.	\$1,540	2.5	\$3,850.00
Joshua T. Davids	Associate/Corporate. Joined the firm as an associate in 2018. Admitted to IL Bar in 2018.	\$1,475	8.5	\$12,537.50
William A. Williams  Associate/Bankruptcy. Join firm as an associate in 2018 Admitted to IL Bar in 2015		\$1,400	19.9	\$27,860.00
Aleksandra Ryshina  Associate/Corporate. Joined the firm as an associate in 2022.  Admitted to the NY bar in 2023.		\$1,175	14.4	\$16,920.00

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Name of Professional	Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice	Hourly Rate	Total Billed Hours	Total Compensation
Rachel T. Magaziner  Associate. Joined the firm as an associate in 2024. Admitted to IL Bar in 2024.		\$930	1.9	\$1,767.00
	Grand Total	188.7	\$326,755.00	

## MONTHLY COMPENSATION BY PROJECT CATEGORY

Saga Formations, Inc. et al. (Case No. 24-11161 (BLS))
July 1, 2025, through and including July 31, 2025

Category Description	Total Hours	<b>Total Fees</b>
Claims	2.6	\$4,084.50
Executory Contracts	1.2	\$1,890.00
Sale of Assets	53.5	\$84,699.50
Plan of Reorganization	82.5	\$145,931.00
Case Administration	8.1	\$15,012.00
Retention and Fee Petitions	11.0	18,270.00
Litigation to Secure Assets	29.8	\$56,868.00
TOTAL	188.7	\$326,755.00

## MONTHLY EXPENSE SUMMARY

Saga Formations, Inc. et al. (Case No. 24-11161 (BLS))
July 1, 2025, through and including July 31, 2025

<b>Expense Category</b>	Total Expenses
Transcripts	\$15,578.96
Trademark Registrations	\$960.00
Corporate Filings	\$753.00
Express Delivery	\$508.14
PACER Charges	\$129.50
Messenger Service	\$119.08
Copies	\$37.48
TOTAL	\$18,086.16

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
SAGA FORMATIONS, INC., et al., 1	Case No. 24-11161 (BLS)
Debtors.	(Jointly Administered)

Obj. Deadline: August 28, 2025, at 4:00 p.m. ET

TENTH MONTHLY APPLICATION
OF JENNER & BLOCK LLP AS COUNSEL TO THE
CHAPTER 11 TRUSTEE, FOR ALLOWANCE OF MONTHLY
COMPENSATION AND FOR MONTHLY REIMBURSEMENT OF ALL
ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD OF
JULY 1, 2025 THROUGH AND INCLUDING JULY 31, 2025

Jenner & Block LLP ("Jenner"), counsel to Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the "Trustee") of the estates of Saga Formations, Inc. (f/k/a Epic! Creations, Inc.), Pajeau, Inc. (f/k/a Neuron Fuel, Inc.), and Tangible Play, Inc. (collectively the "Debtors"), submits this application (the "Application") for monthly allowance of compensation for professional services rendered by Jenner to the Trustee for the period July 1, 2025, through and including July 31, 2025 (the "Application Period") and reimbursement of actual and necessary expenses incurred by Jenner during the Application Period pursuant to sections 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"), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court of the District of Delaware (the "Local Rules"), the United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330, effective January 30,

<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758), and Tangible Play, Inc. (9331).

1996 (the "<u>U.S. Trustee Guidelines</u>") and the *Order Establishing Procedures for Interim*Compensation and Reimbursement of Expenses of Professionals [D.I. 218] (the "<u>Interim</u>

Compensation Procedures Order").<sup>2</sup> In support of this Application, Jenner represents as follows:

### **JURISDICTION**

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012* (the "Standing Order"). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

## **BACKGROUND**

- 2. On June 4 and 5, 2024, GLAS Trust Company LLC, in its capacity as administrative and collateral agent under the November 24, 2021 Credit and Guaranty Agreement and certain other lenders under the Credit Agreement filed involuntary petitions under chapter 11 of the Bankruptcy Code in this Court against the Debtors.
- 3. On September 16, 2024, this Court entered an Order for Relief in Involuntary Cases and Appointing Chapter 11 Trustee [D.I. 147].
- 4. On September 23, 2024 (the "<u>Appointment Date</u>"), the United States Trustee filed an *Application for Entry of An Order Approving the Appointment of Claudia Z. Springer, Esq. as Chapter 11 Trustee* [D.I. 151] and filed a Notice of Appointment appointing Claudia Z. Springer, Esq. as Trustee of the Debtors [D.I. 152]. Since that time, the Trustee has managed the Debtors' affairs pursuant to section 1106 of the Bankruptcy Code. No official committee has been appointed in the Chapter 11 Cases.

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<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Interim Compensation Procedures Order.

5. A more detailed description of the background of the Debtors and these Chapter 11 Cases is set forth in the *Declaration of Claudia Z. Springer in Support of First Day Motions*. [D.I. 193.]

### **JENNER'S RETENTION**

6. The Trustee engaged Jenner as co-counsel to the Trustee in connection with these bankruptcy cases. On October 28, 2024, this Court entered the *Order Authorizing Retention and Employment of Jenner & Block LLP for the Chapter 11 Trustee Nunc Pro Tunc to the Appointment Date* [D.I. 219].

### **FEE PROCEDURES ORDER**

- 7. On October 28, 2024, the Court entered the Interim Compensation Procedures Order, which sets forth the procedures for interim compensation and reimbursement of expenses for all professionals in these cases.
- 8. In particular, the Interim Compensation Procedures Order provides that a professional may file and serve a Monthly Fee Application with the Court each month following the month or months for which compensation is sought. Provided that there are no objections to such Monthly Fee Application filed within 21 days after the service of a Monthly Fee Application, the professional may file a certificate of no objection with the Court, after which the Trustee is authorized to pay such professional 80 percent of the fees and 100 percent of the expenses requested in such Monthly Fee Application. If a partial objection to the Monthly Fee Application is filed, then the Trustee is authorized to pay 80 percent of the fees and 100 percent of the expenses not subject to an objection.

### **RELIEF REQUESTED**

- 9. Jenner submits this Application for (a) allowance of reasonable compensation for the actual, reasonable, and necessary professional services that it has rendered as bankruptcy counsel for the Trustee in these cases for the period from July 1, 2025, through and including July 31, 2025 and (b) for reimbursement of actual, reasonable, and necessary expenses incurred in representing the Trustee during the same period.
- 10. During the period covered by this Application, Jenner incurred fees in the amount of \$326,755.00. For the same period, Jenner incurred actual, reasonable, and necessary expenses totaling \$18,086.16. With respect to these amounts, as of the date of this Application, Jenner has received no payments. Jenner's fees for the Application Period are based on the customary compensation charged by comparably skilled professionals in other cases under Title 11.
- 11. Set forth in the foregoing "Compensation Detail" is a summary of the time expended by timekeepers billing time to these cases.
- 12. **Exhibit A** attached hereto contains logs which show the time recorded by professionals, paraprofessionals and other support staff and descriptions of the services provided.
- 13. Jenner does not charge for outgoing domestic facsimiles and does not charge for incoming facsimiles.
- 14. In accordance with Local Rule 2016-1, Jenner has reduced its request for compensation for non-working travel, if any, to 50% of its normal rate.
- 15. Jenner has endeavored to represent the Trustee in the most expeditious and economical manner possible. Tasks have been assigned to attorneys, paralegals, and other support staff at Jenner so that work has been performed by those most familiar with the particular matter or task and, where attorney or paralegal involvement was required, by the lowest hourly rate professional appropriate for a particular matter. Moreover, Jenner has endeavored to coordinate

with the other professionals involved in these cases so as to minimize any duplication of effort and to minimize attorneys' fees and expenses to the Trustee. We believe we have been successful in this regard.

16. No agreement or understanding exists between Jenner and any other person for the sharing of compensation received or to be received for services rendered in or in connection with these cases.

The undersigned has reviewed the requirements of Local Rule 2016-1 and certifies, to the best of the undersigned's information, knowledge, and belief, that this Application complies with that Rule.

WHEREFORE, Jenner respectfully requests that this Court: (a) allow Jenner (i) monthly compensation in the amount of \$326,755.00 for actual, reasonable and necessary professional services rendered on behalf of the Trustee during the period July 1, 2025 through and including July 31, 2025, and (ii) monthly reimbursement in the amount of \$18,086.16 for actual, reasonable and necessary expenses incurred during the same period; (b) authorize and direct the Trustee to pay to Jenner the amount of \$279,490.16 (which is equal to the sum of 80% of Jenner's requested compensation (\$261,404.00), plus 100% of Jenner's requested expenses of \$18,086.16); and (c) grant such other and further relief as is just and proper.

Dated: August 7, 2025 Wilmington, Delaware

## JENNER & BLOCK LLP

/s/ Catherine Steege

Catherine Steege (admitted pro hac vice)
Melissa Root (admitted pro hac vice)
William A. Williams (admitted pro hac vice)
353 N. Clark Street
Chicago, Illinois 60654
Telephone: (312) 923-2952
csteege@jenner.com
mroot@jenner.com
wwilliams@jenner.com

Co-counsel to the Trustee

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re:	Chapter 11
SAGA FORMATIONS, INC., et al., 1	Case No. 24-11161 (BLS)
Debtors.	(Jointly Administered)
	Obi. Deadline: August 28, 2025, at 4:00 p.m. ET

NOTICE OF TENTH MONTHLY
APPLICATION OF JENNER & BLOCK LLP AS COUNSEL
TO THE CHAPTER 11 TRUSTEE, FOR ALLOWANCE OF MONTHLY
COMPENSATION AND FOR MONTHLY REIMBURSEMENT OF ALL
ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD
JULY 1, 2025, THROUGH AND INCLUDING JULY 31, 2025

PLEASE TAKE NOTICE that today, Jenner & Block LLP as counsel to Claudia Springer, not individually, but solely as Chapter 11 Trustee (the "<u>Trustee</u>") of the estates of Saga Formations, Inc., Pajeau, Inc., and Tangible Play, Inc., filed the attached *Tenth Monthly Application of Jenner & Block LLP as Counsel for the Trustee, for Allowance of Monthly Compensation and for the Monthly Reimbursement of All Actual and Necessary Expenses Incurred for the Period July 1, 2025, through and including July 31, 2025* (the "<u>Application</u>").

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application must: (a) be filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **August 28, 2025, at 4:00 p.m. (Eastern Time)** (the "Objection Deadline"); and (b) be served so as to be received on or before the Objection Deadline by:

- i. <u>the Trustee:</u> Claudia Z. Springer, Novo Advisors, LLC, 401 N. Franklin St., Suite 4 East, Chicago, IL 60654;
- ii. <u>counsel to the Trustee</u>: Jenner & Block LLP, 353 N. Clark Street, Chicago, IL 60654, Attn: Catherine Steege (CSteege@jenner.com); Melissa Root (MRoot@jenner.com); and Pashman Stein Walder Hayden, P.C., 824 N. Market Street, Suite 800, Wilmington, Delaware, 19801-1242, Attn: Henry J. Jaffe (hjaffe@pashmanstein.com) and Joseph C. Barsalona II (jbarsalona@pashmanstein.com); Quinn Emanuel Urquhart & Sullivan, LP, 51 Madison Avenue, 22<sup>nd</sup> Floor, New York, New York 10010, Attn: Benjamin Finestone (benjaminfinestone@quinnemanuel.com);

<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758), and Tangible Play, Inc. (9331).

- iii. <a href="mailto:counsel-for-GLAS">counsel for GLAS</a>: Kirkland & Ellis LLP, 333 West Wolf Point Plaza, Chicago, IL 60654, Attn: Patrick J. Nash Jr. (patrick.nash@kirkland.com); Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn: Brian Schartz, P.C. (bschartz@kirkland.com) and Jordan Elkin (jordan.elkin@kirkland.com); Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, DE 19801, Attn: Laura Davis Jones (ljones@pszjlaw.com); and Reed Smith LLP, 599 Lexington Avenue, 22nd Floor, New York, New York 10022, Attn: David A. Pisciotta (dpisciotta@reedsmith.com);
- iv. <u>counsel for the Petitioning Lender Creditors</u>: Cahill, Gordon & Reindel LLP, 32 Old Slip, New York, NY 10005, Attn: Joel Moss (jmoss@cahill.com); and Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801, Attn: G. David Dean (ddean@coleschotz.com); and
- v. <u>U.S. Trustee for the District of Delaware:</u> Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware, 19801, Attn: Linda Casey (linda.casey@usdoj.gov).

PLEASE TAKE FURTHER NOTICE THAT ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED AND RECEIVED, IN ACCORDANCE WITH THE PROCEDURES ABOVE, WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: August 7, 2025 Wilmington, Delaware

## PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Joseph C. Barsalona II

Henry J. Jaffe (No. 2987)

Joseph C. Barsalona II (No. 6102)

Alexis R. Gambale (No. 7150)

824 N. Market Street, Suite 800

Wilmington, DE 19801

Telephone: (302) 592-6496

Email: hjaffe@pashmanstein.com

jbarsalona@pashmanstein.com agambale@pashmanstein.com

-and-

### JENNER & BLOCK LLP

Catherine Steege (admitted *pro hac vice*)
Melissa Root (admitted *pro hac vice*)
William A. Williams (admitted *pro hac vice*)
353 N. Clark Street
Chicago, Illinois 60654
Talankana (212) 023 2052

Telephone: (312) 923-2952 Email: csteege@jenner.com mroot@jenner.com wwilliams@jenner.com

Co-counsel to the Trustee

# EXHIBIT A

(Detailed Time Entries)

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LAW OFFICES

### JENNER & BLOCK LLP

353 N. Clark Street CHICAGO, ILLINOIS 60654-3456 (312) 222-9350

CLIENT NUMBER: 74248

CLAUDIA SPRINGER, TRUSTEE OF EPIC! CREATIONS, INC. ET AL. NOVO ADVISORS GWYNEDD, PA 19436 AUGUST 7, 2025 INVOICE # 9726458

FOR PROFESSIONAL SERVICES RENDERED THROUGH JULY 31, 2025:

\$ 326,755.00

**DISBURSEMENTS** 

\$ <u>18,086.1</u>6

TOTAL INVOICE

\$ 344,841.16

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LAW OFFICES

## **JENNER & BLOCK LLP**

353 N. Clark Street CHICAGO, ILLINOIS 60654-3456 (312) 222-9350

CLAUDIA SPRINGER, TRUSTEE OF EPIC! CREATIONS, INC. ET AL. NOVO ADVISORS GWYNEDD, PA 19436

CLIENT NUMBER: 74248

FOR PROFESSIONAL SERVICES RENDERED

THROUGH JULY 31, 2025:

CLAIMS MATTER NUMBER - 100				UMBER - 10002
7/08/25	WAW	.50	Conference call with Novo team and Pashman team re claim objections.	700.00
7/16/25	MMR	.70	Review of draft claims objections.	1,102.50
7/18/25	MMR	1.00	Review of Stripe and other flagged claims for purposes of responding to Stripe's claims for payment.	1,575.00
7/23/25	MMR	.30	Review of email from Stripe counsel and confer with Novo re Stripe claim.	472.50
		2.50	PROFESSIONAL SERVICES	\$ 3,850.00

## **SUMMARY OF CLAIMS**

NAME	HOURS	RATE	TOTAL
MELISSA M. ROOT	2.00	1,575.00	3,150.00
WILLIAM A. WILLIAMS	.50	1,400.00	700.00
TOTAL	2.50		\$ 3,850.00
MATTER 10002 TOTAL			\$ 3,850.00

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LAW OFFICES

# **JENNER & BLOCK LLP**

353 N. Clark Street CHICAGO, ILLINOIS 60654-3456 (312) 222-9350

## **EXECUTORY CONTRACTS**

## **MATTER NUMBER - 10003**

7/10/25	MMR	.50	Analyze Amazon defenses to account reconciliation.	787.50
7/18/25	MMR	.70	Review of Amazon calculation of holdback.	1,102.50
7/29/25	CS	.10	Office conference with M. Root re Amazon issues.	234.50
		1.30	PROFESSIONAL SERVICES	\$ 2,124.50

## **SUMMARY OF EXECUTORY CONTRACTS**

NAME	HOURS	RATE	TOTAL
CATHERINE L. STEEGE	.10	2,345.00	234.50
MELISSA M. ROOT	1.20	1,575.00	1,890.00
TOTAL	1.30		\$ 2,124.50
MATTER 10003 TOTAL			\$ 2,124.50

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SALE OF A	ASSETS		MATTER NU	MBER - 10004
7/01/25	PHR	.30	Participated on call with Hy Ruby, Novo, Simpson Thatcher and Jenner teams to review post-closing checklist.	519.00
7/01/25	JAB	.30	Corresponded with A. Smith (Guideline) re 401(k) plan termination.	462.00
7/01/25	JXD	.80	Call with Novo, Simpson Thatcher and Jenner teams re post-closing action items (.3); emails with Novo and Jenner team members re post-closing action items (.5).	1,180.00
7/01/25	AR	.30	Met with Hy Ruby for weekly post-closing checklist call.	352.50
7/01/25	AR	.50	Prepared email summarizing Hy Ruby meeting highlights.	587.50
7/02/25	PHR	.50	Reviewed APA and Disclosure Schedules re privilege matters and correspondence with M. Root re same.	865.00
7/07/25	CS	.20	Telephone conference with C. Springer and J. Grall re sale of Tangible Play IP.	469.00
7/07/25	MMR	.50	Participate in post-closing call with deal team.	787.50
7/07/25	SKM	.50	Participated on weekly status update call and tracked status of open items.	770.00
7/07/25	JXD	.80	Call with Novo team re post-closing action items.	1,180.00
7/08/25	CS	.90	Attended closing call with Hy Ruby and internal team.	2,110.50
7/08/25	CS	1.20	Prepared follow-up memo re open issue on executory contracts issues arising post closing.	2,814.00
7/08/25	PHR	.90	Participated on call with Hy Ruby, Novo, and Jenner teams re post-closing checklist.	1,557.00
7/08/25	JAB	.50	Teleconference with Guideline and M. Renaud re delinquent form 5500 filings.	770.00
7/08/25	JXD	1.10	Call with Novo, STB and Jenner teams re post-closing action items (.9); emails with Novo and Jenner team members re post-closing action items (.2).	1,622.50
7/08/25	AR	.90	Attended weekly post-closing call with Hy Ruby.	1,057.50

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7/09/25	MJR	.80	Prepared for and attended conference call with Guideline re 401(k) plan termination.	1,428.00
7/10/25	JAB	.40	Reviewed and analyzed guidance re Form 5500 audited financials for qualified plan.	616.00
7/10/25	JXD	.80	Emails with J. Grall and Novo team members re purchase price allocation.	1,180.00
7/11/25	MJR	.50	Reviewed Form 5500 issues and ways to address missed pre-petition filings.	892.50
7/11/25	MJR	2.20	Researched alternative courses of action including Abandoned Plan regulations to allow for termination of 401(k) plan.	3,927.00
7/11/25	MJR	.60	Drafted email to C. Steege re alternatives to terminate 401(k) plan.	1,071.00
7/11/25	MJR	.40	Telephone conference with C. Steege and J. Bressel re alternatives to terminate 401(k) plan.	714.00
7/11/25	CS	.40	Telephone conference with M. Renaud re 401(k) plan audit issue.	938.00
7/11/25	JAB	.40	Teleconference with M. Renaud re abandoned plan procedures.	616.00
7/11/25	JAB	.10	Reviewed Form 5500 details from 2021 plan year.	154.00
7/11/25	JAB	.10	Corresponded with Guideline re 401(k) plan termination.	154.00
7/14/25	MJR	.50	Met with client, C. Steege and J. Bressel re 401k plan termination.	892.50
7/14/25	MJR	1.70	Reviewed DOL abandoned plan program re same.	3,034.50
7/14/25	CS	.50	Telephone conference with M. Renaud, C. Springer and J. Bressel re 401(k) plan termination.	1,172.50
7/14/25	PHR	.80	Participated on call with Novo, Pashman and Jenner teams re status of case.	1,384.00
7/14/25	MMR	.80	Review of TP correspondence and sale offer for IP, license issue (.7); confer with J. Elkin re same (.1).	1,260.00
7/14/25	JAB	.50	Attended meeting with C. Springer, C. Steege, and M. Renaud re 401(k) plan termination and annual report filings.	770.00

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7/14/25	SKM	.80	Participated on weekly status update call (.4) and tracked status of open items (.4).	1,232.00
7/14/25	JXD	.40	Call with Novo team re post-closing action items.	590.00
7/14/25	AR	.40	Attended weekly internal meeting with Novo.	470.00
7/14/25	AR	1.10	Drafted email explaining export of records process to AlixPartners.	1,292.50
7/14/25	AR	2.00	Prepared draft email for Hy Ruby explaining that cure claims were paid and most publisher fees were not outstanding.	2,350.00
7/14/25	AR	1.50	Emailed Hy Ruby regarding purchase price allocation and reconciliation of outstanding excluded fees.	1,762.50
7/14/25	AR	1.00	Discussed purchase price allocation with J. Davids.	1,175.00
7/15/25	MJR	2.30	Researched EBSA plan termination program for abandoned plans.	4,105.50
7/15/25	MJR	.10	Telephone conference to DOL re same.	178.50
7/15/25	PHR	.40	Participated on call with Novo, Hy Ruby, STB and Jenner teams re post-closing matters.	692.00
7/15/25	MMR	.40	Participate in post-closing call.	630.00
7/15/25	JAB	.50	Reviewed and analyzed 401(k) plan termination documents sent from Guideline.	770.00
7/15/25	JXD	.90	Call with Novo, STB and Jenner teams re post-closing action items (.4); emails with Novo and Jenner team members re post-closing action items (.5).	1,327.50
7/15/25	AR	.50	Attended weekly Hy Ruby post-closing call.	587.50
7/15/25	AR	.50	Drafted email regarding purchase price allocation to Hy Ruby.	587.50
7/15/25	AR	.50	Discussed download of Books and Records with AlixPartners.	587.50
7/15/25	AR	.30	Prepared for Hy Ruby weekly call.	352.50
7/15/25	AR	.30	Emailed Hy Ruby regarding financial reconciliation and setting up meeting with AlixPartners.	352.50

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7/16/25	AR	1.50	Prepared email response to Hy Ruby's question regarding the copying of books and records.	1,762.50
7/18/25	JXD	.10	Email with A. Ryshina re coordination of records copying process.	147.50
7/21/25	PHR	.20	Participated on call with Novo, Pashman and Jenner teams re status of case.	346.00
7/21/25	SKM	.20	Participated on weekly check-in call.	308.00
7/21/25	JXD	.50	Call with Novo team re post-closing action items.	737.50
7/21/25	AR	.30	Attended weekly internal call with Novo.	352.50
7/22/25	MJR	.50	Met with J. Bressel re plan termination.	892.50
7/22/25	MJR	1.00	Prepared for telephone conference with EBSA San Francisco deputy director with written queries re best way to terminate 401(k) plan.	1,785.00
7/22/25	CS	.50	Attended post-closing call with Hy Ruby.	1,172.50
7/22/25	PHR	.50	Participated on call with Novo, Hy Ruby, STB and Jenner teams re post-closing matters.	865.00
7/22/25	MMR	.50	Participate in post sale closing call	787.50
7/22/25	JAB	.20	Analyzed considerations re abandoned plan program for 401(k) plan.	308.00
7/22/25	JAB	.10	Contacted DOL re termination of 401(k) plan.	154.00
7/22/25	JXD	.80	Call with Novo, STB and Jenner teams re post-closing action items (.5); emails with Novo and Jenner team members re post-closing action items (.3).	1,180.00
7/22/25	AR	.50	Attended weekly internal call with Hy Ruby.	587.50
7/22/25	AR	.30	Responded to W. Rittsteuer email regarding discrepancy in Hy Ruby and Novo pre-paids amount.	352.50
7/23/25	AR	.20	Reached out to Hy Ruby to discuss reconciliation spreadsheet.	235.00
7/24/25	JXD	.40	Responded to question from N. VanDeCasteele re maintenance of insurance coverage for sold entities.	590.00
7/25/25	MJR	.10	Email conference with EBSA San Francisco office re 401(k) plan issues.	178.50

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7/28/25	JAB	.30	Prepared talking points for meeting with C. Swanson (EBSA) re abandoned plan program.	462.00
7/28/25	SKM	1.00	Participated in weekly check-in call.	1,540.00
7/28/25	JXD	.50	Attended part of call with Novo team re post-closing action items.	737.50
7/28/25	AR	1.00	Attended internal weekly meeting with Novo.	1,175.00
7/28/25	AR	.20	Follow-up call with J. Davids in preparation for call with Hy Ruby.	235.00
7/29/25	CS	.60	Attended post-close call with Hy Ruby.	1,407.00
7/29/25	MMR	.60	Participate in post-closing call.	945.00
7/29/25	JAB	.30	Telephone conference with Guideline Offboarding Team re 401(k) plan termination.	462.00
7/29/25	JXD	.90	Call with Novo, STB and Jenner teams re post-closing action items (.6); emails with Novo and Jenner team members re post-closing action items (.3).	1,327.50
7/29/25	AR	.60	Attended weekly post-closing call with Hy Ruby and Novo.	705.00
7/30/25	MJR	.80	Zoom with EBSA regional office re 401(k) plan termination issues.	1,428.00
7/30/25	CS	.20	Telephone conference with potential buyer for Tangible Play.	469.00
7/30/25	CS	.10	Telephone conference with C. Springer re potential buyer.	234.50
7/30/25	JAB	.30	Meeting with C. Swanson (EBSA) and M. Renaud re 401(k) plan termination and abandoned plan program.	462.00
7/30/25	JXD	.50	Emails with Novo and Hy Ruby teams re coordination of release of funds.	737.50
7/31/25	CS	1.00	Revised Hy Ruby novation template.	2,345.00
7/31/25	MMR	.30	Follow up on Stripe account balance/APA obligations.	472.50
7/31/25	JAB	.30	Corresponded with Guideline re 401(k) plan termination.	462.00
		53.50	PROFESSIONAL SERVICES	\$ 84,699.50

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LAW OFFICES

# **JENNER & BLOCK LLP**

353 N. Clark Street CHICAGO, ILLINOIS 60654-3456 (312) 222-9350

### **SUMMARY OF SALE OF ASSETS**

MATTER 10004 TOTAL

NAME	HOURS	RATE	TOTAL
CATHERINE L. STEEGE	5.60	2,345.00	13,132.00
MATTHEW J. RENAUD	11.50	1,785.00	20,527.50
PETER H. ROSENBAUM	3.60	1,730.00	6,228.00
MELISSA M. ROOT	3.10	1,575.00	4,882.50
JENNA A. BRESSEL	4.30	1,540.00	6,622.00
SHARON K. MORAES	2.50	1,540.00	3,850.00
JOSHUA T. DAVIDS	8.50	1,475.00	12,537.50
ALEKSANDRA RYSHINA	14.40	1,175.00	16,920.00
TOTAL	53.50		\$ 84,699.50

\$84,699.50

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PLAN OF REORGANIZATION		NIZATION	MATTER NUMBER - 10006	
7/01/25	CS	.30	Telephone conference with C. Springer re plan.	703.50
7/01/25	CS	3.80	Edited plan.	8,911.00
7/01/25	GMD	.20	Emails with M. Root re Plan and Disclosure.	447.00
7/01/25	MMR	4.80	Worked on drafting combined plan and disclosure statement and related filings.	7,560.00
7/01/25	WAW	4.20	Reviewed and revised draft combined plan and disclosure statement.	5,880.00
7/02/25	CS	3.50	Edited plan.	8,207.50
7/02/25	CS	1.00	Edited motion re plan procedures.	2,345.00
7/02/25	GMD	.70	Discussed tax aspects of Plan and Disclosure with M. Root and C. Steege.	1,564.50
7/02/25	MMR	4.70	Continued work on plan and disclosure statement, multiple emails and conferences with team.	7,402.50
7/02/25	MMR	1.00	Revises solicitation motion (.8); conferred with Veritas re same (.2).	1,575.00
7/07/25	CS	.90	Edited procedures motion.	2,110.50
7/07/25	CS	.90	Edited plan.	2,110.50
7/08/25	WAW	.50	Conference call with Novo team re liquidation analysis.	700.00
7/09/25	MMR	1.20	Work on updated solicitation/plan documents.	1,890.00
7/11/25	MMR	.80	Review of revisions to plan/DS received by lenders.	1,260.00
7/14/25	CS	.40	Reviewed liquidation analysis; met with M. Root and W. Williams re plan issues.	938.00
7/14/25	MMR	4.60	Review of K&E comments and work on plan and related documents, review of investigation file and claims data in connection with same.	7,245.00
7/14/25	MMR	.60	Review of additional edits to plan received from K&E (.5); email with G. Davis re tax matters (.1).	945.00
7/14/25	MMR	.40	Review of DIP order and credit agreement in connection with claim issue.	630.00

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7/14/25	AM	.20	Responded to question re application of funds.	324.00
7/14/25	WAW	.60	Met with M. Root and C. Steege to discuss revisions to draft plan and disclosure statement.	840.00
7/14/25	WAW	1.20	Revised plan solicitation procedures motion to incorporate edits from lenders' counsel.	1,680.00
7/14/25	WAW	.40	Multiple email correspondence with Jenner team and Novo team re plan solicitation procedures.	560.00
7/14/25	WAW	2.10	Revised chapter 11 plan and disclosure statement to incorporate revisions received from lenders' counsel.	2,940.00
7/14/25	WAW	.40	Reviewed DIP order language re roll-up and conferred with Jenner team re same.	560.00
7/15/25	CS	.70	Participated in post-closing checklist call.	1,641.50
7/15/25	CS	.40	Participated in call with G. Davis and M. Root re tax issues.	938.00
7/15/25	CS	5.60	Revised combined plan and disclosure statement.	13,132.00
7/15/25	CS	.40	Telephone conference with C. Springer re plan and lender's edits.	938.00
7/15/25	GMD	2.50	Reviewed and resolved K&E tax concerns relating to the Plan Disclosure.	5,587.50
7/15/25	MMR	.70	Review of tax precedent (.4); call with G. Davis and C. Steege re same (.3).	1,102.50
7/15/25	MMR	.10	Call with D. Saffel (K&E) re plan.	157.50
7/15/25	MMR	.50	Call with B. Williams and C. Steege re plan and DS.	787.50
7/15/25	MMR	1.20	Revise solicitation motion.	1,890.00
7/15/25	MMR	6.30	Revisions to finalize combined plan and disclosure statement, and attachments.	9,922.50
7/15/25	WAW	.50	Multiple email correspondence with Jenner team re plan and disclosure statement and related matters.	700.00
7/15/25	WAW	.60	Conference call with C. Steege and M. Root to discuss liquidation analysis and related worksteams.	840.00
7/15/25	WAW	2.80	Finalized chapter 11 plan and disclosure statement.	3,920.00

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7/15/25	WAW	1.50	Finalized plan solicitation procedures motion and related exhibits.	2,100.00
7/15/25	RTM	1.90	Proofed and edited the Combined Disclosure Statement and Chapter 11 Plan for the Estates.	1,767.00
7/16/25	MMR	.90	Review of research memo re jurisdictional issues and cases/plan language in same.	1,417.50
7/17/25	MMR	.70	Call with Verita team re solicitation (.5); review of Affidavits of service and follow up emails (.2).	1,102.50
7/23/25	MMR	1.70	Research re precedent on retained causes of action schedule and other plan supplement matters.	2,677.50
7/24/25	MMR	2.80	Begin work on plan confirmation matters, brief, declaration, form of order.	4,410.00
7/28/25	CS	.20	Reviewed L. Casey email re solicitation motion.	469.00
7/28/25	MMR	1.80	Work on plan related mattersplan supplement documents, retained causes of action, confirmation filings (1.6); confer with C. Steege re same (.2).	2,835.00
7/28/25	MMR	1.40	Review of plan/ DS/solicitation motion for further revision.	2,205.00
7/29/25	CS	.20	Reviewed UST plan edits.	469.00
7/29/25	CS	.20	Email with L. Casey re voting procedures objections.	469.00
7/30/25	MMR	.60	Review of comments received from UST (.2); pull and review precedential plans in connection with proposed language changes (.4).	945.00
7/30/25	MMR	.60	Work on confirmation brief.	945.00
7/31/25	CS	.90	Revised procedures order to accommodate UST objections.	2,110.50
7/31/25	CS	2.40	Prepared plan summary.	5,628.00
7/31/25	CS	1.00	Responded to further edits from UST to plan.	2,345.00
7/31/25	MMR	2.00	Work on plan related matters including revisions to plan, notices, proposed order conditionally approving disclosure statement.	3,150.00
		82.50	PROFESSIONAL SERVICES	\$ 145,931.00

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LAW OFFICES

# **JENNER & BLOCK LLP**

353 N. Clark Street CHICAGO, ILLINOIS 60654-3456 (312) 222-9350

## **SUMMARY OF PLAN OF REORGANIZATION**

MATTER 10006 TOTAL

NAME	HOURS	RATE	TOTAL
CATHERINE L. STEEGE	22.80	2,345.00	53,466.00
GEOFFREY M. DAVIS	3.40	2,235.00	7,599.00
ANNA MERESIDIS	.20	1,620.00	324.00
MELISSA M. ROOT	39.40	1,575.00	62,055.00
WILLIAM A. WILLIAMS	14.80	1,400.00	20,720.00
RACHEL T MAGAZINER	1.90	930.00	1,767.00
TOTAL	82.50		\$ 145,931.00

\$ 145,931.00

LAW OFFICES

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CASE ADM	IINISTRATION			MATTER NUMBER - 10008
7/07/25	CS	.80	Attended weekly strategy meeting.	1,876.00
7/07/25	PHR	.50	Participated on call with Novo, Pashman and cleams re status of case.	lenner 865.00
7/07/25	MMR	.80	Participate in weekly status call with Trustee a advisors.	nd 1,260.00
7/07/25	WAW	.80	Attended weekly coordination call with Trustee professionals.	's 1,120.00
7/08/25	WAW	.40	Telephone call with Moduslink's counsel regardstatus.	ding case 560.00
7/14/25	CS	.80	Telephone conference with case team re week and strategy.	d's work 1,876.00
7/14/25	MMR	.80	Attend weekly meeting with Trustee and couns	sel. 1,260.00
7/18/25	MMR	.20	Correspond with K&E regarding vendor/operat and confer with Novo team re same.	ional issue 315.00
7/21/25	CS	.50	Telephone conference with team re strategy for	or week. 1,172.50
7/21/25	MMR	.50	Participate in weekly status meeting with Trust team.	ee and 787.50
7/28/25	CS	1.00	Attended weekly strategy meeting.	2,345.00
7/28/25	MMR	1.00	Call with Trustee and counsel/FA team regards status and strategy.	ng case 1,575.00
		8.10	PROFESSIONAL SERVICES	\$ 15,012.00

## **SUMMARY OF CASE ADMINISTRATION**

NAME	HOURS	RATE	TOTAL
CATHERINE L. STEEGE	3.10	2,345.00	7,269.50
PETER H. ROSENBAUM	.50	1,730.00	865.00
MELISSA M. ROOT	3.30	1,575.00	5,197.50
WILLIAM A. WILLIAMS	1.20	1,400.00	1,680.00
TOTAL	8.10		\$ 15,012.00

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LAW OFFICES

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MATTER 10008 TOTAL \$ 15,012.00

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LAW OFFICES

## **JENNER & BLOCK LLP**

353 N. Clark Street CHICAGO, ILLINOIS 60654-3456 (312) 222-9350

RETENTION AND FEE PETITIONS			MATTER NUMBER - 10010	
7/07/25	CS	1.20	Edited monthly fee statement.	2,814.00
7/08/25	CS	.80	Revised fee statement.	1,876.00
7/10/25	WAW	3.10	Prepared Jenner's ninth monthly fee application	n. 4,340.00
7/14/25	MMR	.60	Review of sealed filings.	945.00
7/16/25	MMR	.30	Confer with co-counsel re sealed filing matters	. 472.50
7/16/25	WAW	.30	Multiple email correspondence with M. Root refilings.	sealed 420.00
7/17/25	MMR	1.10	Meeting with party (.5); follow up with C. Steeg revise agreement (.3).	e (.3); 1,732.50
7/17/25	MMR	.70	Revise seal and related motion.	1,102.50
7/18/25	MMR	2.10	Work on finalizing filings and seal documents.	3,307.50
7/18/25	MMR	.10	Confer with C. Steege re sealed filings.	157.50
7/23/25	MMR	.30	Revise sealed filings.	472.50
7/25/25	MMR	.40	Revise sealed filings (.3); correspond with part (.1).	y re same 630.00
		11.00	PROFESSIONAL SERVICES	\$ 18,270.00
SUMMARY OF RETENTION AND FEE PETITIONS				
NAME CATHERIN	IE L. STEEGE	≣	HOURS RA 2.00 2,345	TOTAL 4,690.00

Page	16
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5.60

3.40

11.00

1,575.00

1,400.00

8,820.00

4,760.00

\$ 18,270.00

\$ 18,270.00

MELISSA M. ROOT

**TOTAL** 

WILLIAM A. WILLIAMS

MATTER 10010 TOTAL

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LAW OFFICES

### JENNER & BLOCK LLP

353 N. Clark Street CHICAGO, ILLINOIS 60654-3456 (312) 222-9350

### **EXPENSES MATTER NUMBER - 10011** Transcripts - Deposition; U.S. LEGAL SUPPORT, INC.; 04/10/2025 4/10/25 632.50 Transcripts - Deposition; U.S. LEGAL SUPPORT, INC.; 04/10/2025 4/10/25 3.652.23 4/10/25 Transcripts - Deposition; U.S. LEGAL SUPPORT, INC.; 04/10/2025 1,035.00 Transcripts - Deposition; U.S. LEGAL SUPPORT, INC.; 04/29/2025 4/29/25 805.00 5/13/25 Transcripts - Deposition; U.S. LEGAL SUPPORT, INC.; 05/13/2025 1,695.45 (Auction) 5/13/25 Transcripts - Deposition; U.S. LEGAL SUPPORT, INC.; 05/13/2025 672.75 (Auction) 5/14/25 Transcripts - Deposition; U.S. LEGAL SUPPORT, INC.; 05/14/2025 2,101.63 (Auction) Transcripts - Deposition; U.S. LEGAL SUPPORT, INC.; 05/14/2025 5/14/25 1,694.53 (Auction) 5/14/25 Transcripts - Deposition; U.S. LEGAL SUPPORT, INC.; 05/14/2025 1,423.27 (Auction) 5/14/25 Transcripts - Deposition; U.S. LEGAL SUPPORT, INC.; 05/14/2025 1,866.60 (Auction) 6/17/25 Other Professional Services; CT CORPORATION; 06/17/2025 753.00 7/01/25 **B&W Copy** 1.21 Pacer Charges; PACER SERVICE CENTER; 07/07/2025 7/07/25 129.50 7/10/25 Color Copy 2.50 7/10/25 **B&W Copy** .77 960.00 7/16/25 Court Fees, CAROLE DURAN, 07/16/2025 (trademark registrations) 7/21/25 Color Copy 8.25 7/21/25 **B&W Copy** 21.34 7/22/25 **B&W Copy** 1.32 7/24/25 **B&W Copy** 1.54 7/26/25 Special Messenger Service,, 07/26/2025 119.08 7/29/25 **B&W Copy** .55 7/31/25 Other -; DHL EXPRESS - USA; 07/31/2025 508.14 TOTAL DISBURSEMENTS \$ 18,086.16

MATTER 10011 TOTAL \$ 18,086.16

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353 N. Clark Street CHICAGO, ILLINOIS 60654-3456 (312) 222-9350

LITIGATIO	N TO SE	CURE ASSET	TS MATTER	R NUMBER - 10012
7/01/25	CS	.80	Telephone conference with India counsel re India Voizzit litigation.	1,876.00
7/02/25	CS	.40	Telephone conference with R. Shankar re Voizzit litigation.	938.00
7/02/25	CS	1.00	Telephone conference with M. Root and W. Williams re plan edits.	2,345.00
7/17/25	CS	.40	Attended call re retention and collection of judgment.	938.00
7/21/25	CS	.30	Office conference with M. Root re Indian filings.	703.50
7/21/25	MMR	1.30	Prepare for meeting with Stripe counsel including review of proofs of claim, adversary status, and Trustee claims against Stripe (.8); meeting with Stripe counsel (.3); follow up with Novo Advisors re same (.2).	2,047.50
7/21/25	MMR	3.20	Review and comment on India pleadings (contempt reply, response to interrogatories, affidavits in support of filings) (2.8); multiple communications with India counsel re same (.4).	
7/22/25	MMR	.50	Review of additional documents for filing in India lawsuit	787.50
7/24/25	MMR	.30	Communicate with India team re timing and documents needed for India filing.	472.50
7/25/25	MMR	.50	Review of Kerala High Court decision.	787.50
7/28/25	CS	.60	Reviewed India court judgment.	1,407.00
7/28/25	CS	.50	Telephone conference with Indian counsel re judgment and strategy.	1,172.50
7/28/25	CS	2.00	Reviewed other Indian filings re contempt.	4,690.00
7/28/25	CS	.90	Prepared email to K&E re Indian suit and high court ruling.	2,110.50
7/28/25	MMR	.70	Call with India counsel re Kerala decision and next steps	1,102.50
7/28/25	MMR	.40	Prepare Stripe settlement outline.	630.00
7/29/25	CS	2.00	Revised and edited Supreme Court appeal papers from Indian counsel.	4,690.00

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LAW OFFICES

# **JENNER & BLOCK LLP**

353 N. Clark Street CHICAGO, ILLINOIS 60654-3456 (312) 222-9350

7/29/25	MMR	2.80	Research re Amazon's asserted setoff and recoupment defenses and review of Amazon transactions in connection therewith (2.3); meeting with Novo to discuss (.5).	4,410.00
7/29/25	MMR	.80	Review of Stripe filings in adversary proceeding and facts regarding notice in connection with preparation of demand letter.	1,260.00
7/29/25	MMR	.70	Work on Springer declaration.	1,102.50
7/29/25	MMR	.30	Review of Byiu's Alpha protective order.	472.50
7/30/25	CS	4.00	Continued to edit 85-page India Supreme Court filing.	9,380.00
7/30/25	MMR	2.50	Research on 542, stay, and notice issues re Stripe response (1.8); work on settlement demand analysis for Stripe claim (1.7).	3,937.50
7/30/25	MMR	.50	Correspond with party regarding engagement and necessary documents.	787.50
7/30/25	MMR	.80	Review of brief to be submitted to India Supreme Court to reverse Kerala High Court decision.	1,260.00
7/31/25	MMR	1.60	Review of research on constructive notice (.8); finalize draft of Stripe letter (.8).	2,520.00
		29.80	PROFESSIONAL SERVICES	\$ 56,868.00

## **SUMMARY OF LITIGATION TO SECURE ASSETS**

NAME	HOURS	RATE	TOTAL
CATHERINE L. STEEGE	12.90	2,345.00	30,250.50
MELISSA M. ROOT	16.90	1,575.00	26,617.50
TOTAL	29.80		\$ 56,868.00
MATTER 10012 TOTAL	TOTAL	. INVOICE	\$ 56,868.00 \$ 344,841.16

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LAW OFFICES

# **JENNER & BLOCK LLP**

353 N. Clark Street CHICAGO, ILLINOIS 60654-3456 (312) 222-9350

## **SUMMARY OF PROFESSIONAL SERVICES**

NAME	HOURS	RATE	TOTAL
CATHERINE L. STEEGE	46.50	2,345.00	109,042.50
GEOFFREY M. DAVIS	3.40	2,235.00	7,599.00
MATTHEW J. RENAUD	11.50	1,785.00	20,527.50
PETER H. ROSENBAUM	4.10	1,730.00	7,093.00
ANNA MERESIDIS	.20	1,620.00	324.00
MELISSA M. ROOT	71.50	1,575.00	112,612.50
JENNA A. BRESSEL	4.30	1,540.00	6,622.00
SHARON K. MORAES	2.50	1,540.00	3,850.00
JOSHUA T. DAVIDS	8.50	1,475.00	12,537.50
WILLIAM A. WILLIAMS	19.90	1,400.00	27,860.00
ALEKSANDRA RYSHINA	14.40	1,175.00	16,920.00
RACHEL T MAGAZINER	1.90	930.00	1,767.00
TOTAL	188.70		\$ 326,755.00