# UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

: Chapter 11: Case No. 25-10292 (LSS)

Dynamic Aerostructures LLC, et al., 1 : (Jointly Administered)

(Jointly Administered

Debtors.

Hearing Date: Aug. 5, 2025 at 2:00 p.m. (ET)

SUPPLEMENT TO THIRD MONTHLY AND FINAL FEE APPLICATION OF BERKELEY RESERCH GROUP, LLC FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS FINANCIAL ADVISOR TO THE DEBTORS DURING THE PERIOD FROM JUNE 16, 2025 THROUGH JULY 31, 2025

Berkeley Research Group, LLC ("<u>BRG</u>"), financial advisor to the above-captioned debtors and debtors-in-possession (collectively, the "<u>Debtors</u>"), hereby submits this supplement (the "<u>Fee Supplement</u>") to its third monthly and final fee application for compensation for services rendered and reimbursement of expenses incurred [Docket No. 278] (the "<u>Application</u>"),<sup>2</sup> and respectfully represents as follows:

#### RELIEF REQUESTED AND BASIS THEREFOR

1. By the Application, BRG requested approval on a final basis of a final fee allowance as financial advisor for the Debtors in the amount of \$969,927.50, together with reimbursement of expenses in the amount of \$3,427.41, for a total final fee award of \$973,354.91 for the final fee application period from February 26, 2025 through June 15, 2025 (the "Final Fee Period").

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the 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: Dynamic Aerostructures LLC (3076); Dynamic Aerostructures Intermediate LLC (9800); and Forrest Machining LLC (3421). The Debtors' service address is 27756 Avenue Mentry, Valencia, California 91355.

- 2. The amounts requested in the Application included estimated compensation of \$140,000.00 for time spent after June 15, 2025 in support of the final case wind down and dismissal. BRG files this Fee Supplement to include the actual amount of compensation for services rendered and expenses incurred for the period from June 16, 2025 through July 31, 2025 (the "Supplemental Period").
- 3. During the Supplemental Period, BRG incurred fees in the amount of \$96,220.50 and expenses in the amount of \$0.00. Attached hereto as **Exhibit A** is the schedule of professionals who rendered services to the Debtors during the Supplemental Period including each person's bill rate and the blended rate. **Exhibit B** shows the schedule of fees expended during the Supplemental Period by task code. Attached as **Exhibit C** are BRG's detailed time descriptions for the Supplemental Period which describe the time spent by each BRG professional.
- 4. Specifically, during the Supplemental Period BRG assisted the Debtors with the completion of Monthly Operating Reports ("MORs"). This included working with the Debtors to aggregate and prepare the information necessary to complete the MOR forms and the various supporting schedules. BRG also updated and reviewed daily cash packages, reviewed federal income tax returns and cash disbursements, evaluated customer receivables and utility deposit returns, updated the net distribution reporting with respect to the Debtors' prepetition secured lender, updated professional fees escrow tracker, and held discussions with the Debtors and their advisors regarding the same. Additional time was spent preparing, editing, and reviewing the Final Fee Application and this Fee Supplement.
- 5. The additional amounts set forth in **Exhibit A** during the Supplemental Period represent reasonable compensation for actual, necessary services rendered by BRG during the Final Compensation Period and are compensable under Appendix A to Part 58 Guidelines for

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Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11

U.S.C. § 330.

6. BRG respectfully requests that the Court enter an Order approving, on a final basis,

the amounts requested in the Application, as modified by the amounts requested in this Fee

Supplement, as follows: \$926,148.00 in compensation for services rendered, together with

reimbursement of expenses in the amount of \$3,427.41, for a total final fee award of \$929,575.41

for the Final Fee Period plus the Supplemental Period.

WHEREFORE, BRG respectfully requests a final fee allowance as financial advisor for

the Debtors in the amount of \$926,148.00, together with reimbursement of expenses in the amount

of \$3,427.41, for a total final fee award of \$929,575.41.

Dated: 8/1/2025

Atlanta, GA

BERKELEY RESEARCH GROUP, LLC

By: /s/ Robert Butler

Robert Butler

Managing Director

3350 Riverwood Parkway

**Suite 2105** 

Atlanta, GA 30339

678-575-4864

Financial Advisor to the Debtors

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In re: Dynamic Aerostructures LLC, et al.

**Exhibit A: Fees By Professional** 

# **Berkeley Research Group, LLC**

For the Period 6/16/2025 through 7/31/2025



Professional	Title	Billing Rate	Hours	Fees
B. Butler	Managing Director	\$1,140.00	42.0	\$47,880.00
J. Racy	Senior Managing Consultant	\$835.00	18.2	\$15,197.00
B. Kraemer	Associate	\$445.00	47.7	\$21,226.50
L. Chen	Associate	\$445.00	3.9	\$1,735.50
M. Haverkamp	Case Manager	\$395.00	19.6	\$7,742.00
E. Degnan	Case Assistant	\$205.00	11.9	\$2,439.50
Total			143.3	\$96,220.50
Blended Rate				\$671.46

In re: Dynamic Aerostructures LLC, et al.

### **Exhibit B: Fees By Task Code**

# **Berkeley Research Group, LLC**

For the Period 6/16/2025 through 7/31/2025



Task Code	Hours	Fees
05. Professional Retention/ Fee Application Preparation	37.2	\$16,679.50
07. Interaction/ Meetings with Debtors/ Counsel	3.4	\$3,693.00
18. Operating and Other Reports	45.7	\$33,985.00
19. Cash Flow/Cash Management/ Liquidity	36.5	\$25,948.00
26. Tax Issues	1.6	\$1,824.00
36. Operation Management	15.9	\$11,805.00
37. Vendor Management	3.0	\$2,286.00
Total	143.3	\$96,220.50
Blended Rate		\$671.46

In re: Dynamic Aerostructures LLC, et al.

**Exhibit C: Time Detail** 

# **Berkeley Research Group, LLC**

For the Period 6/16/2025 through 7/31/2025



Date	Professional	Hours	Description		
05. Professional Retention/ Fee Application Preparation					
6/16/2025	M. Haverkamp	0.6	Edited final fee application.		
6/17/2025	M. Haverkamp	2.1	Edited final fee application narrative.		
6/17/2025	E. Degnan	1.3	Prepared final fee application.		
6/17/2025	B. Butler	1.3	Reviewed BRG time detail for the period from 5-1-25 through 5-31-25.		
6/17/2025	M. Haverkamp	1.0	Edited final fee application detail.		
6/18/2025	M. Haverkamp	0.2	Edited FMI final fee application.		
6/19/2025	M. Haverkamp	0.6	Edited final fee application.		
6/20/2025	M. Haverkamp	2.4	Edited final fee application.		
6/23/2025	M. Haverkamp	2.9	Edited final fee application.		
6/23/2025	E. Degnan	2.9	Prepared final fee application.		
6/23/2025	B. Butler	0.4	Reviewed initial draft of BRG third monthly and final fee application for the period from 2-26-25 through 6-15-25.		
6/24/2025	M. Haverkamp	2.7	Edited final fee application.		
6/24/2025	E. Degnan	1.9	Prepared May/final fee application.		
6/25/2025	M. Haverkamp	2.3	Edited final fee application.		
6/25/2025	E. Degnan	1.6	Prepared final fee application.		
6/25/2025	B. Butler	1.2	Reviewed second draft of BRG third monthly and final fee application for the period from 2-26-25 through 6-15-25.		
6/25/2025	B. Butler	0.7	Reviewed BRG time detail for the period from 6-1-25 through 6-15-25.		
6/25/2025	B. Butler	0.6	Reviewed third draft of BRG third monthly and final fee application for the period from 2–26-25 through 6-15-25.		
6/26/2025	M. Haverkamp	0.9	Edited final fee application.		
Berkeley Research Group, LLC Invoice for the 6/16/2025 - 7/31/2025 Per					

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Date	Professional	Hours	Description			
05. Professional Retention/ Fee Application Preparation						
6/26/2025	B. Butler	0.7	Reviewed final to be filed BRG third monthly and final fee application for the period from 2-26-25 through 6-15-25.			
6/26/2025	E. Degnan	0.2	Prepared May/final fee application.			
7/17/2025	M. Haverkamp	0.1	Reviewed status and timing for final fee application supplement.			
7/24/2025	E. Degnan	1.1	Prepared supplement to final fee application.			
7/24/2025	M. Haverkamp	0.7	Edited final fee application supplement.			
7/28/2025	E. Degnan	1.8	Prepared final fee application supplement.			
7/28/2025	M. Haverkamp	0.7	Edited final fee app supplement.			
7/29/2025	B. Butler	0.6	Reviewed BRG time detail from 6-16-25 through 7-26-25 to be included in a supplement to BRG final fee application.			
7/29/2025	E. Degnan	0.3	Prepared supplement to final fee application.			
7/31/2025	M. Haverkamp	2.4	Edited final fee application supplement.			
7/31/2025	E. Degnan	0.8	Prepared supplement to final application.			
7/31/2025	B. Butler	0.2	Reviewed BRG time detail for the period from 7-27-25 through 7-31-25 to be included in to be filed supplemental final BRG fee application for the period from 6-16-25 through 7-31-25.			
Task Code To	otal Hours	37.2				
07. Interacti	ion/ Meetings with Del	btors/ Counsel				
6/16/2025	B. Butler	0.1	Participated in call with former CFO S. Finley re: status of Avem customer receivables collections by FMI as compared to previous Avem vendor payments made by FMI, other case matters.			
6/16/2025	J. Racy	0.1	Participated in call with former CFO S. Finley to discuss collections, May MOR, distributions.			
6/18/2025	B. Butler	0.1	Participated in call with former CFO S. Finley re: cash control process, status of utility deposit, other case matters.			
6/18/2025	J. Racy	0.1	Participated in call with former CFO S. Finley to discuss cash activity and upcoming May MOR.			
6/20/2025	J. Racy	0.1	Participated in call with former CFO S. Finley to discuss cash management and Avem distribution.			

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Date	Professional	Hours	Description			
07. Interaction/ Meetings with Debtors/ Counsel						
6/23/2025	B. Butler	0.2	Participated in call with former CFO S. Finley re: cash control process, status of utility deposit, 5-25 Monthly Operating Reports, other matters.			
6/23/2025	J. Racy	0.2	Participated in call with former CFO S. Finley to discuss cash management.			
6/24/2025	B. Butler	0.2	Corresponded with former CFO S. Finley, Chipman (D. Egan) re: updated status of FMI receiving utility deposit from Southern California Edison, next steps.			
6/27/2025	B. Butler	0.5	Participated in call with former CFO S. Finley re: status of utility deposit, remaining federal and state income tax return filings, timing of buyer Avem customer receivables to be collected by Avem versus FMI, cash control process, other matters.			
6/27/2025	B. Butler	0.3	Corresponded with former CEO E. Ellis, former CFO S. Finley, Board Chair M. Zawalski, Endeavour (D. Eve, R. Lamba), Chipman (M. Desgrosseilliers, D. Egan), Ropes (G. Galardi) re: BRG third and final fee application.			
7/2/2025	B. Butler	0.2	Participated in call with former CFO S. Finley re: status of utility deposit refund, cash control process, federal and state income tax returns preparation, other matters.			
7/3/2025	B. Butler	0.1	Participated in call with former CFO S. Finley re: 5-25 Monthly Operating Reports, utility deposit refund, cash control process, other case matters.			
7/3/2025	J. Racy	0.1	Participated in call with former CFO S. Finley to review Avem net distribution through 7.3.25.			
7/11/2025	B. Butler	0.6	Participated in call with CRO J. Carroll, former CFO S. Finley, Chipman (D. Egan) re: consolidated federal and California state income tax returns status and next actions, liquidity management, cash control process, other matters.			
7/15/2025	B. Butler	0.1	Participated in call with former CFO S. Finley re: cash control process, buyer Avem net distribution from FMI, Debtors' 6-25 Monthly Operating Reports.			
7/31/2025	B. Butler	0.4	Participated in call with former CFO S. Finley re: ongoing cash control process, final federal and state of California income tax returns preparation, other pre case dismissal actions.			
Task Code To	otal Hours	3.4				
18. Operatin	ng and Other Reports					
6/23/2025	B. Kraemer	2.9	Prepared the May Monthly Operating Report for the Forrest Machining LLC entity.			

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Date	Professional	Hours	Description		
18. Operating and Other Reports					
6/23/2025	B. Kraemer	2.6	Continued to prepare the May Monthly Operating Report for the Forrest Machining LLC entity.		
6/23/2025	B. Butler	0.7	Reviewed Debtors' 5-25 financial statements to be input into the respective Monthly Operating Reports.		
6/24/2025	B. Butler	0.8	Reviewed Debtors' 5-25 financial statements for input into respective Monthly Operating Reports.		
6/25/2025	B. Kraemer	1.2	Prepared the May Monthly Operating Report for the Forrest Machining LLC entity.		
6/25/2025	B. Butler	0.6	Reviewed Debtors' 5-25 financial statements for input into the respective Monthly Operating Reports.		
6/26/2025	B. Kraemer	0.7	Prepared the May Monthly Operating Report for the Forrest Machining LLC entity.		
6/26/2025	B. Butler	0.6	Reviewed Debtors' 5-25 Monthly Operating Reports.		
6/27/2025	B. Butler	0.5	Reviewed updated drafts of Debtors' 5-25 Monthly Operating Reports.		
7/1/2025	B. Butler	0.6	Reviewed Debtors' 5-25 Monthly Operating Reports.		
7/1/2025	J. Racy	0.6	Reviewed May draft MOR for Forrest Machining LLC entity.		
7/2/2025	B. Butler	0.8	Reviewed Debtors' 5-25 Monthly Operating Reports.		
7/2/2025	B. Kraemer	0.6	Updated the May Monthly Operating Report for the Forrest Machining LLC entity.		
7/3/2025	J. Racy	1.7	Reviewed May MOR for Forrest Machining entity.		
7/3/2025	B. Butler	1.6	Reviewed revised drafts of Debtors' 5-25 Monthly Operating Reports.		
7/3/2025	B. Butler	0.2	Corresponded with CRO J. Carroll, Chipman (M. Desgrosseilliers, D. Egan) re: status of preparation of the Debtors' 5-25 Monthly Operating Reports and timing of expected filing, next steps.		
7/7/2025	B. Butler	1.4	Reviewed Debtors' draft Monthly Operating Reports and related support for the period from 5-1-25 through 5-31-25.		
7/7/2025	B. Kraemer	1.2	Prepared the May MOR for the Forrest Machining LLC entity.		
7/7/2025	B. Kraemer	0.8	Prepared the May MOR for the Dynamic Aerostructures Intermediate LLC entity.		
7/7/2025	B. Kraemer	0.7	Prepared the May MOR for the Dynamic Aerostructures LLC entity.		

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Date	Professional	Hours	Description			
18. Operating and Other Reports						
7/8/2025	B. Kraemer	0.7	Prepared the May MOR for the Forrest Machining LLC entity.			
7/8/2025	B. Butler	0.6	Reviewed Debtors' to be filed versions of Monthly Operating Reports for the period from 5-1-25 through 5-31-25.			
7/8/2025	B. Kraemer	0.5	Prepared the May MOR for the Dynamic Aerostructures Intermediate LLC entity.			
7/8/2025	B. Kraemer	0.4	Prepared the May MOR for the Dynamic Aerostructures LLC entity.			
7/15/2025	B. Butler	0.6	Reviewed Debtors' 6-25 financial information / data to be utilized in the preparation of the respective Monthly Operating Reports.			
7/16/2025	B. Kraemer	2.4	Prepared the June MOR for the Forrest Machining LLC entity.			
7/16/2025	B. Kraemer	0.9	Continued to prepare the June MOR for the Forrest Machining LLC entity.			
7/16/2025	B. Butler	0.5	Reviewed Debtors' 6-25 monthly financial data to be utilized to prepare respective 6-25 Monthly Operating Reports.			
7/17/2025	B. Kraemer	2.6	Prepared the June MOR for the Forrest Machining LLC entity.			
7/17/2025	J. Racy	1.6	Reviewed draft of Forest Machining Company June MOR.			
7/17/2025	B. Butler	1.2	Reviewed initial draft of Debtors' 6-25 Monthly Operating Reports.			
7/18/2025	B. Butler	1.1	Reviewed draft of Debtors' 6-25 Monthly Operating Reports.			
7/21/2025	B. Butler	1.4	Reviewed revised drafts of Debtors' 6-25 MORs.			
7/21/2025	J. Racy	1.0	Reviewed Forest Machining LLC global notes for June MOR.			
7/21/2025	B. Kraemer	0.8	Prepared the June MOR for the Forrest Machining LLC entity.			
7/21/2025	B. Kraemer	0.6	Prepared the June MOR for the Dynamic Aerostructures Intermediate LLC entity.			
7/21/2025	B. Kraemer	0.5	Prepared the June MOR for the Dynamic Aerostructures LLC entity.			
7/22/2025	J. Racy	1.5	Reviewed updated Dynamic Aerostructures LLC June MOR.			
7/22/2025	B. Butler	1.3	Reviewed final drafts of Debtors 6-25 Monthly Operating Reports to be delivered to CRO J. Carroll.			
7/22/2025	B. Kraemer	1.2	Prepared the June MOR for the Forrest Machining LLC entity.			
7/22/2025	J. Racy	1.2	Reviewed updated Dynamic Aerostructures Intermediate LLC June MOR.			

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Date	Professional	Hours	Description			
18. Operatin	18. Operating and Other Reports					
7/22/2025	J. Racy	1.2	Reviewed updated Forrest Machining LLC June MOR following comments from D. Egan (Chipman).			
7/27/2025	B. Butler	0.2	Reviewed status of remaining open items to proceed with filing of Debtors' 6-25 Monthly Operating Reports.			
7/29/2025	B. Kraemer	0.3	Prepared the June MOR for the Dynamic Aerostructures Intermediate LLC entity.			
7/29/2025	B. Kraemer	0.3	Prepared the June MOR for the Dynamic Aerostructures LLC entity.			
7/29/2025	B. Kraemer	0.3	Prepared the June MOR for the Forrest Machining LLC entity.			
Task Code To	otal Hours	45.7				
19. Cash Flo	w/Cash Manager	ment/ Liquidity				
6/16/2025	J. Racy	1.0	Reviewed draft daily cash package as of 6/16/25 for distribution to CRO J. Carroll.			
6/16/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 6/16 with bank data provided by former CFO S. Finley.			
6/16/2025	B. Kraemer	0.3	Updated daily cash package with financial data through 6/16 for distribution to CRO J. Carroll.			
6/16/2025	J. Racy	0.1	Reviewed cash flow activity as of 6/16/25.			
6/17/2025	B. Butler	1.5	Reviewed daily BMO cash account disbursements by financial line item for the period from 6-2-25 through 6-17-25.			
6/17/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 6/17 with bank data provided by former CFO S. Finley.			
6/17/2025	B. Kraemer	0.4	Updated the wind down budget to account for the latest cash flow actuals.			
6/17/2025	J. Racy	0.2	Reviewed cash flow activity as of 6/17/25.			
6/18/2025	J. Racy	1.9	Reviewed draft daily cash package as of 6/18/25 for distribution to CRO J. Carroll.			
6/18/2025	B. Kraemer	1.1	Updated daily cash package with financial data through $6/18$ for distribution to CRO J. Carroll.			
6/18/2025	B. Butler	0.9	Reviewed BRG draft report of daily BMO cash account transactions by financial line item for the period from 6-2-25 through 6-18-25.			
6/18/2025	J. Racy	0.3	Reviewed cash flow actuals activity as of 6/18/25.			

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Date	Professional	Hours	Description			
19. Cash Flo	9. Cash Flow/Cash Management/ Liquidity					
6/18/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 6/18 with bank data provided by former CFO S. Finley.			
6/19/2025	J. Racy	1.1	Updated draft daily cash package as of $6/18/25$ for distribution to CRO J. Carroll with comments from B. Butler (BRG).			
6/19/2025	B. Butler	0.8	Reviewed to be issued to CRO J. Carroll BRG report of daily BMO cash account transactions for the period from 6-2-25 through 6-18-25.			
6/19/2025	B. Kraemer	0.6	Revised the daily cash package through 6/18 prior to distributing to CRO J. Carroll.			
6/20/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 6/20 with bank data provided by former CFO S. Finley.			
6/23/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 6/23 with bank data provided by former CFO S. Finley.			
6/23/2025	B. Kraemer	0.2	Updated daily cash package with financial data through 6/23 for distribution to CRO J. Carroll.			
6/24/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 6/24 with bank data provided by former CFO S. Finley.			
6/24/2025	B. Kraemer	0.3	Updated daily cash package with financial data through 6/24 for distribution to CRO J. Carroll.			
6/25/2025	B. Kraemer	0.4	Updated daily cash package with financial data through 6/25 for distribution to CRO J. Carroll.			
6/25/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 6/25 with bank data provided by former CFO S. Finley.			
6/26/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 6/26 with bank data provided by former CFO S. Finley.			
6/26/2025	B. Kraemer	0.2	Updated daily cash package with financial data through 6/26 for distribution to CRO J. Carroll.			
6/27/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 6/27 with bank data provided by former CFO S. Finley.			
6/27/2025	B. Kraemer	0.2	Updated daily cash package with financial data through 6/27 for distribution to CRO J. Carroll.			
6/30/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 6/30 with bank data provided by former CFO S. Finley.			
7/1/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 7/1 with bank data provided by former CFO S. Finley.			

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Date	Professional	Hours	Description				
19. Cash Flo	19. Cash Flow/Cash Management/ Liquidity						
7/1/2025	B. Kraemer	0.2	Updated daily cash package with financial data through 7/1 for distribution to CRO J. Carroll.				
7/2/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 7/2 with bank data provided by former CFO S. Finley.				
7/2/2025	B. Kraemer	0.2	Updated daily cash package with financial data through 7/2 for distribution to CRO J. Carroll.				
7/3/2025	B. Butler	0.5	Reviewed daily cash flows by financial line item through 7-2-25.				
7/7/2025	B. Butler	0.6	Reviewed BMO account daily cash results by financial line item from 6-19-25 through 7-7-25.				
7/7/2025	B. Kraemer	0.2	Updated log of BMO cash activity through 7/7 with bank data provided by former CFO S. Finley.				
7/8/2025	B. Kraemer	0.5	Updated daily cash package with financial data through 7/8 for distribution to CRO J. Carroll.				
7/8/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 7/8 with bank data provided by former CFO S. Finley.				
7/8/2025	J. Racy	0.2	Reviewed cash flow actual activity as of 7/7/25.				
7/9/2025	B. Butler	0.4	Reviewed BMO account daily cash results by financial line item for the period from 6-19-25 through 7-9-25.				
7/9/2025	B. Kraemer	0.2	Updated log of BMO cash activity through 7/9 with bank data provided by former CFO S. Finley.				
7/10/2025	B. Butler	0.9	Reviewed draft BRG presentation of BMO account daily cash results by financial line item for the period from 6-19-25 through 7-10-25 to be distributed to CRO J. Carroll.				
7/10/2025	B. Kraemer	0.4	Updated daily cash package with financial data through 7/10 for distribution to CRO J. Carroll.				
7/10/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 7/10 with bank data provided by former CFO S. Finley.				
7/11/2025	B. Butler	0.7	Reviewed final version of BRG presentation of BMO account daily cash results by financial line item for the period from 6-19-25 through 7-10-25 to be delivered to CRO J. Carroll.				
7/11/2025	B. Kraemer	0.5	Updated daily cash package with financial data through 7/11 for distribution to CRO J. Carroll.				
7/11/2025	B. Kraemer	0.2	Updated log of BMO cash activity through 7/11 with bank data provided by former CFO S. Finley.				

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Date	Professional	Hours	Description			
19. Cash Flow/Cash Management/ Liquidity						
7/14/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 7/14 with bank data provided by former CFO S. Finley.			
7/15/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 7/15 with bank data provided by former CFO S. Finley.			
7/16/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 7/16 with bank data provided by former CFO S. Finley.			
7/17/2025	J. Racy	0.5	Reviewed daily cash tracking model reflecting cash activity as of 7/16/25.			
7/17/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 7/17 with bank data provided by former CFO S. Finley.			
7/21/2025	J. Racy	0.5	Reviewed cash activity through 7/21/25.			
7/21/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 7/21 with bank data provided by former CFO S. Finley.			
7/21/2025	L. Chen	0.3	Updated log of BMO cash activity through 7/21 with bank data provided by former CFO S. Finley.			
7/22/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 7/22 with bank data provided by former CFO S. Finley.			
7/22/2025	L. Chen	0.3	Updated log of BMO cash activity through 7/22 with bank data provided by former CFO S. Finley.			
7/23/2025	J. Racy	0.3	Reviewed cash flow activity as of 7/23/25.			
7/23/2025	L. Chen	0.3	Updated log of BMO cash activity through 7/23 with bank data provided by former CFO S. Finley.			
7/23/2025	B. Kraemer	0.2	Updated log of BMO cash activity through 7/23 with bank data provided by former CFO S. Finley.			
7/24/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 7/24 with bank data provided by former CFO S. Finley.			
7/25/2025	J. Racy	0.3	Reviewed cash flow activity as of 7/25/25.			
7/28/2025	B. Butler	0.8	Reviewed BMO account daily actual cash flow results by financial item for the period from 7-10-25 through 7-27-25.			
7/28/2025	B. Kraemer	0.5	Updated log of BMO cash activity through 7/28 with bank data provided by former CFO S. Finley.			
7/28/2025	L. Chen	0.3	Updated log of BMO cash activity through 7/28 with bank data provided by former CFO S. Finley.			

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Date	Professional	Hours	Description	
19. Cash Flow/Cash Management/ Liquidity				
7/29/2025	B. Kraemer	1.7	Updated daily cash package with financial data through 7/29 for distribution to CRO J. Carroll.	
7/29/2025	B. Butler	1.1	Reviewed draft BRG presentation of BMO account daily cash flow results by financial line item for the period from 7-10-25 through 7-28-25 to be delivered to CRO J. Carroll.	
7/29/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 7/29 with bank data provided by former CFO S. Finley.	
7/29/2025	L. Chen	0.3	Updated log of BMO cash activity through 7/29 with bank data provided by former CFO S. Finley.	
7/29/2025	J. Racy	0.2	Reviewed cash flow actuals as of 7/29/25.	
7/30/2025	B. Butler	0.7	Reviewed BMO account daily cash flows results by financial line item for the period from 7-10-25 through 7-30-25.	
7/30/2025	J. Racy	0.4	Reviewed daily cash report with activity through 7/30/25 for distribution to CRO J. Carroll.	
7/30/2025	B. Kraemer	0.4	Updated log of BMO cash activity through 7/30 with bank data provided by former CFO S. Finley.	
7/31/2025	B. Butler	0.8	Reviewed revised final draft BRG presentation of BMO account daily cash activity by financial line item for the period from 7-10-25 through 7-30-25 to be delivered to CRO J. Carroll.	
7/31/2025	B. Kraemer	0.6	Updated daily cash package with financial data through 7/31 for distribution to CRO J. Carroll.	
7/31/2025	J. Racy	0.5	Reviewed daily cash package for the period of 7/10 through 7/30 for distribution to CRO J. Carroll.	
7/31/2025	B. Kraemer	0.3	Updated log of BMO cash activity through 7/31 with bank data provided by former CFO S. Finley.	
7/31/2025	L. Chen	0.3	Updated log of BMO cash activity through 7/31 with bank data provided by former CFO S. Finley.	
7/31/2025	J. Racy	0.1	Reviewed daily cash activity as of 7/31/25.	
Task Code Total Hours 36.5				
26. Tax Issue	es			
7/7/2025	B. Butler	0.1	Corresponded with former CFO S. Finley, Chipman (M. Desgrosseilliers, D. Egan) re: organizing call with CRO J. Carroll, Chipman, former CFO, BRG regarding preparation and filing of open federal and California state income tax returns.	

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Date	Professional	Hours	Description		
26. Tax Issues					
7/7/2025	B. Butler	0.1	Participated in call with former California state income tax retu	CFO S. Finley re: status of federal and rns, next actions.	
7/9/2025	B. Butler	0.9	•	res and subsidiaries consolidated are period from 4-1-24 through 12-31-24.	
7/9/2025	B. Butler	0.5		res and subsidiaries draft consolidated rn for the period from 4-1-24 through	
Task Code To	otal Hours	1.6			
36. Operation	on Management				
6/16/2025	J. Racy	0.2	Created updated distribution to 6/16/25.	Avem with cash activity through	
6/16/2025	B. Kraemer	0.2	Updated the draft net distribut activity on behalf of Avem thro	ion to Avem report with BMO cash ugh 6/16.	
6/16/2025	B. Butler	0.1	Reviewed cash disbursements p	olan through 6-27-25.	
6/17/2025	B. Butler	0.4		r receivables collections by FMI and by FMI on behalf of the buyer for the 17-25.	
6/17/2025	B. Kraemer	0.2	Updated the draft net distribut activity on behalf of Avem thro	ion to Avem report with BMO cash ugh 6/17.	
6/18/2025	B. Kraemer	0.2	Updated the draft net distribut activity on behalf of Avem thro	ion to Avem report with BMO cash ugh 6/18.	
6/20/2025	B. Butler	0.4		r receivables collections by FMI and by FMI on behalf of the buyer for the 20-25.	
6/20/2025	B. Kraemer	0.4	Updated the draft net distribut activity on behalf of Avem thro	ion to Avem report with BMO cash ugh 6/20.	
6/20/2025	J. Racy	0.2	Updated Avem cash distribution	n package as of 6/20/25.	
6/23/2025	B. Butler	0.2	Reviewed buyer Avem custome 23-25 to be transferred by FMI	r receivables collections by FMI on 6- to the buyer.	
6/23/2025	B. Kraemer	0.2	Updated the draft net distribut activity on behalf of Avem thro	ion to Avem report with BMO cash ugh 6/23.	
6/23/2025	B. Butler	0.1	Reviewed cash disbursements p	olan through 7-3-25.	
6/25/2025	B. Butler	0.2	Participated in call with Chipma utility deposit from Southern Ca	n (D. Egan) re: status of FMI receiving alifornia Edison, next actions.	

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Date	Professional	Hours	Description	
36. Operation Management				
6/26/2025	B. Kraemer	0.4	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 6/26.	
6/27/2025	B. Butler	0.3	Reviewed buyer Avem customer receivables collected by FMI and payments made by FMI on behalf of the buyer for the period from 6-24-25 through 6–27-25.	
6/27/2025	B. Kraemer	0.2	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 6/27.	
6/30/2025	B. Kraemer	0.3	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 6/30.	
6/30/2025	B. Butler	0.2	Reviewed buyer Avem 6-30-25 customer receivables collections by FMI to be transferred to the buyer.	
7/1/2025	B. Kraemer	0.3	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/1.	
7/1/2025	B. Butler	0.2	Reviewed cash disbursements plan through 7-11-25.	
7/2/2025	B. Kraemer	0.3	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/2.	
7/3/2025	B. Butler	0.3	Reviewed buyer Avem customer receivables collected by FMI for the period from 7-3-25 through 7-6-25 for transfer to buyer.	
7/7/2025	B. Butler	0.2	Reviewed cash disbursements plan through 7-18-25.	
7/7/2025	J. Racy	0.2	Reviewed draft Avem distribution as of 7/7/25.	
7/7/2025	B. Kraemer	0.2	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/7.	
7/8/2025	B. Butler	0.3	Reviewed buyer Avem customer accounts receivables collections by FMI and vendor payments by FMI on behalf of the buyer for the period from 7-4-25 through 7-8-25.	
7/8/2025	B. Kraemer	0.3	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/8.	
7/9/2025	B. Kraemer	0.3	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/9.	
7/10/2025	B. Butler	0.3	Reviewed buyer Avem customer accounts receivables collections by FMI for the period from 7-9-25 through 7-10-25.	
7/10/2025	B. Kraemer	0.2	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/10.	

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Date	Professional	Hours	Description	on	
36. Operation Management					
7/11/2025	B. Kraemer	0.2	•	ie draft net distributio behalf of Avem throuຍຸ	n to Avem report with BMO cash gh 7/11.
7/14/2025	B. Butler	0.3	buyer vend	•	receivables collections by FMI and FMI on behalf of the buyer for the 4-25.
7/14/2025	B. Butler	0.2	Reviewed o	ash disbursements pla	an through 7-25-25.
7/14/2025	B. Kraemer	0.2	•	ne draft net distributio behalf of Avem throug	n to Avem report with BMO cash gh 7/14.
7/15/2025	B. Kraemer	0.6	•	ie draft net distributio behalf of Avem throuຍຸ	n to Avem report with BMO cash gh 7/15.
7/15/2025	B. Butler	0.2		Tell control of the c	receivables collections by FMI and FMI on behalf of buyer for 7-15-25.
7/15/2025	B. Butler	0.2			osits still owed to FMI after receipt of uthern California Edison.
7/16/2025	B. Kraemer	0.2	•	ne draft net distributio behalf of Avem throug	n to Avem report with BMO cash gh 7/16.
7/17/2025	B. Kraemer	0.2	•	e draft net distributio behalf of Avem throug	n to Avem report with BMO cash gh 7/17.
7/18/2025	B. Butler	0.4	payments t		receivables collections by FMI and MI on behalf of the buyer for the 8-25.
7/21/2025	L. Chen	0.3	•	ne draft net distributio behalf of Avem throug	n to Avem report with BMO cash gh 7/21.
7/21/2025	B. Butler	0.2	Reviewed o	ash disbursements pla	an through 8-1-25.
7/21/2025	B. Butler	0.2	Reviewed ( 31-25.	CRO J. Carroll invoice f	or the period from 5-1-25 through 5-
7/21/2025	B. Butler	0.2	Reviewed 0 30-25.	CRO J. Carroll invoice f	or the period from 6-1-25 through 6-
7/21/2025	B. Kraemer	0.2		ne draft net distributio behalf of Avem throug	n to Avem report with BMO cash gh 7/21.
7/22/2025	L. Chen	0.3	•	ne draft net distributio behalf of Avem throug	n to Avem report with BMO cash gh 7/22.
7/22/2025	B. Kraemer	0.3	•	e draft net distributio behalf of Avem throug	n to Avem report with BMO cash gh 7/22.

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Date	Professional	Hours	Description		
36. Operation Management					
7/22/2025	B. Butler	0.2	Reviewed buyer Avem customer accounts receivable collections by FMI and payments made by FMI to buyer vendors on behalf of the buyer for the period from 7-21-25 through 7-22-25.		
7/23/2025	B. Butler	0.3	Reviewed buyer Avem customer accounts receivable collections by FMI and payments to buyer's vendors by FMI on behalf of the buyer through 7-23-25.		
7/23/2025	L. Chen	0.3	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/23.		
7/23/2025	B. Kraemer	0.2	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/23.		
7/24/2025	B. Kraemer	0.2	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/24.		
7/28/2025	J. Racy	0.3	Created draft Avem distribution as of 7/28/25.		
7/28/2025	L. Chen	0.3	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/28.		
7/28/2025	B. Butler	0.2	Reviewed cash disbursements plan through 8-8-25.		
7/28/2025	B. Kraemer	0.2	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/28.		
7/29/2025	B. Butler	0.3	Reviewed buyer Avem customer accounts receivable collections by FMI and payments by FMI on behalf of buyer for the period from 7-25-25 through 7-28-25.		
7/29/2025	L. Chen	0.3	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/29.		
7/29/2025	B. Kraemer	0.2	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/29.		
7/30/2025	L. Chen	0.3	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/30.		
7/30/2025	B. Butler	0.2	Reviewed buyer Avem customer accounts receivable collections by FMI and payments made by FMI on buyer's behalf to buyer's vendors.		
7/30/2025	B. Kraemer	0.2	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/30.		
7/31/2025	L. Chen	0.3	Updated the draft net distribution to Avem report with BMO cash activity on behalf of Avem through 7/31.		

15.9

Task Code Total Hours

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Date	Professional	Hours	Description
37. Vendor	Management		
6/16/2025	B. Kraemer	0.2	Updated the professional fee escrow account tracker for wire remitted to Verita today.
6/25/2025	B. Kraemer	0.2	Updated the professional fees escrow account tracker for Ropes & Gray first and final monthly fee application filed today.
6/26/2025	B. Butler	0.6	Reviewed Ropes & Gray first and final fee application for the period from 2-26-25 through 6-11-25.
6/26/2025	B. Kraemer	0.4	Updated the professional fees escrow account tracker to reflect Chipman final fee application filed today.
6/27/2025	B. Kraemer	0.4	Updated the professional fees escrow account tracker to reflect BRG final fee application filed today.
6/27/2025	B. Butler	0.3	Reviewed Chipman third and final fee application for the period from 2-26-25 through the final fee hearing.
6/27/2025	B. Butler	0.3	Reviewed updated reconciliation of professional fee escrow reserve to give effect to the filing of all Debtors' professionals final fee applications.
7/16/2025	J. Racy	0.3	Reviewed updated professional fee tracker following latest

0.3

3.0

143.3

professional fee disbursements.

invoice forwarded by Counsel today.

Updated the professional fees escrow account tracker for Verita June

7/16/2025

**Total Hours** 

Task Code Total Hours

B. Kraemer