

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

In re:  FULCRUM BIOENERGY, INC., <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 11  Case No. 24-12008 (TMH)  (Jointly Administered)  Obj. Deadline: June 23, 2025 at 4:00 p.m. (ET) Hearing Date: August 4, 2025 at 10:00 a.m. (ET)
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**COVER SHEET FOR COMBINED MONTHLY AND FINAL FEE APPLICATION OF  
EVERSHEDS SUTHERLAND (US) LLP FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR THE (I) MONTHLY PERIOD  
FROM MARCH 1, 2025 THROUGH AND INCLUDING MAY 5, 2025 AND (II) FINAL  
PERIOD FROM SEPTEMBER 21, 2024 THROUGH AND INCLUDING MAY 5, 2025**

Name of Applicant:	Eversheds Sutherland (US) LLP (“ <u>Eversheds</u> ”)
Authorized to Provide Professionals Services to:	Official Committee of Unsecured Creditors
Effective Date of Retention:	September 21, 2024 (Order entered October 22, 2024)
Monthly Period for Which Compensation and Reimbursement are Sought:	March 1, 2025 through May 5, 2025
Monthly Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$214,520.00
Monthly Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$9,358.50
Final Period for Which Compensation and Reimbursement are Sought:	September 21, 2024 through May 5, 2025
Final Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$1,317,711.25 <sup>2</sup>

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with each debtor’s federal tax identification numbers are: Fulcrum BioEnergy, Inc. (3733); Fulcrum Sierra BioFuels, LLC (1833); Fulcrum Sierra Finance Company, LLC (4287); and Fulcrum Sierra Holdings, LLC (8498). The location of the Debtors’ service address is: Fulcrum BioEnergy Inc., P.O. Box 220 Pleasanton, CA 94566.

<sup>2</sup> Total compensation sought includes (i) fees incurred in connection with preparing this Application and assisting with the preparation of applications of other Committee professionals after the occurrence of the Effective Date and (ii) estimated time for seeking final approval of this Application. For the avoidance of doubt, Eversheds only seeks compensation of the actual, reasonable and necessary compensation actually incurred.



Final Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$30,507.62
Fees Previously Paid Pursuant to Interim Compensation Order:	\$1,015,020.65
Expenses Previously Pursuant to Interim Compensation Order:	\$21,149.12
Estimated Amount of Compensation Sought as Actual, Reasonable and Necessary Incurred from May 6, 2025 Through and Including the Hearing Date on the Final Fee Applications:	\$14,582.50
Type of Application:	Monthly and Final Fee Application

**Prior Monthly Fee Applications Filed**

<b>Date Filed</b>	<b>Period Covered</b>	<b>Requested Fees</b>	<b>Requested Expenses</b>	<b>Approved Fees</b>	<b>Approved Expenses</b>	<b>Unapproved Holdback</b>
11/22/2024 [D.I. 283]	09/21/2024 - 10/31/2024	\$532,063.00	\$14,499.11	\$532,063.00	\$14,499.11	Not applicable
12/13/2024 [D.I. 312]	11/01/2024 - 11/30/2024	\$188,605.25	\$3,847.11	\$188,605.25	\$3,847.11	Not applicable
02/24/2025 [D.I. 442]	12/01/2024 - 01/31/2025	\$311,025.00	\$2,621.74	\$248,820.00	\$2,621.74	\$62,205
03/26/2025 [D.I. 499]	02/01/2025 - 02/28/2025	\$56,915.50	\$181.16	\$45,532.40	\$181.16	\$11,383.10

**Prior Interim Fee Applications Filed**

<b>Date Filed</b>	<b>Period Covered</b>	<b>Requested Fees</b>	<b>Requested Expenses</b>	<b>Approved Fees</b>	<b>Approved Expenses</b>
12/27/2024 [D.I. 335]	09/21/2024 - 11/30/2024	\$720,668.25.00	\$18,346.22	\$719,883.25 <sup>3</sup>	\$18,346.22

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<sup>3</sup> This amount reflects a voluntary fee reduction of \$785.00 as agreed to with the Court, which is set forth in the *First Omnibus Order Granting Interim Allowance of Fees and Expenses for Certain Professionals* [D.I. 393].

**COMPENSATION BY PROJECT CATEGORY****(MONTHLY COMPENSATION PERIOD)**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
BK 110 - Asset Disposition	26.90	\$32,875.00
BK 130 – Case Administration and Analysis	9.90	\$10,057.50
BK 140 – Claims Administration and Objections	3.00	\$3,555.00
BK 141 – Lien Investigation	1.30	\$1,547.50
BK 160 – Fee/ Employment Applications	9.30	\$9,232.50
BK 170 - Fee/ Employment Objections	1.50	\$1,537.50
BK 180 – Financing	1.90	\$2,087.50
BK 190 – Litigation General	0.50	\$672.50
BK 200 – Meetings of Creditors	14.40	\$16,755.00
BK 210 – Plan and Disclosure Statement	107.10	\$127,312.50
BK 220 – Relief from Stay Proceedings	0.90	\$1,087.50
BK 310 – Travel Time	12.00	\$7,800.00
<b>TOTAL</b>	<b>188.70</b>	<b>\$214,520.00</b>

**(FINAL COMPENSATION PERIOD)**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
BK 110 - Asset Disposition	330.20	\$360,761.00
BK 130 – Case Administration and Analysis	70.50	\$72,256.00
BK 140 – Claims Administration and Objections	14.40	\$14,883.50
BK 141 – Lien Investigation	142.90	\$148,078.00
BK 160 – Fee/ Employment Applications	85.30	\$81,025.50
BK 170 - Fee/ Employment Objections	11.00	\$10,587.00
BK 180 – Financing	169.80	\$183,445.00
BK 190 – Litigation General	58.40	\$49,772.50
BK 200 – Meetings of Creditors	96.40	\$103,746.50
BK 210 – Plan and Disclosure Statement	195.20	\$230,607.50
BK 220 – Relief from Stay Proceedings	4.90	\$4,864.00
BK 310 – Travel Time	54.70	\$32,276.75
BK 900 – Insurance	9.20	\$10,825.50
<b>TOTAL</b>	<b>1,242.90</b>	<b>\$1,303,128.75</b>

**SUMMARY OF BILLING BY PROFESSIONAL****(MONTHLY COMPENSATION PERIOD)**

<b>Name of Attorney or Other Professional</b>	<b>Title</b>	<b>Year Admitted to Practice</b>	<b>Hourly Rate</b>	<b>Hours Billed</b>	<b>Total Individual Fees</b>
Todd C. Meyers	Partner	1991	\$1,525.00	47.00	\$71,675.00
Todd C. Meyers	Partner	1991	\$762.50	6.00	\$4,575.00
Robert S. Chase II	Partner	1997	\$1,550.00	0.60	\$930.00
Rob Ellis	Partner	2011	\$1,200.00	3.90	\$4,680.00
Jennifer B. Kimble	Senior Counsel	2005	\$1,075.00	90.60	\$97,395.00
Jennifer B. Kimble	Senior Counsel	2005	\$537.50	6.00	\$3,225.00
Frank Comparetto III	Counsel	2013	\$1,100.00	0.20	\$220.00
Sameer M. Alifarag	Associate	2019	\$925.00	34.40	\$31,820.00
<b>TOTAL</b>				<b>188.70</b>	<b>\$214,520.00</b>

**Blended Hourly Rate: \$1,136.83**

**(FINAL COMPENSATION PERIOD)**

<b>Name of Attorney or Other Professional</b>	<b>Title</b>	<b>Year Admitted to Practice</b>	<b>Hourly Rate</b>	<b>Hours Billed</b>	<b>Total Individual Fees</b>
Kathleen D. Boyle	Partner	1983	\$965.00	6.60	\$6,369.00
John J. Busillo	Partner	1984	\$995.00	13.10	\$13,034.50
Todd C. Meyers	Partner	1991	\$1,525.00	96.80	\$147,620.00
Todd C. Meyers	Partner	1991	\$1,435.00	176.00	\$252,560.00
Todd C. Meyers	Partner	1991	\$762.50	6.00	\$4,575.00
Todd C. Meyers	Partner	1991	\$717.50	17.60	\$12,628.00
David A. Wender	Partner	2003	\$1,100.00	0.70	\$770.00
Robert S. Chase II	Partner	1997	\$1,550.00	0.60	\$930.00
Rob Ellis	Partner	2011	\$1,200.00	3.90	\$4,680.00
Eric Fenichel	Senior Counsel	1986	\$1,400.00	0.20	\$280.00
Eric Fenichel	Senior Counsel	1986	\$1,300.00	0.20	\$260.00
Jennifer B. Kimble	Senior Counsel	2005	\$1,075.00	182.40	\$196,080.00
Jennifer B. Kimble	Senior Counsel	2005	\$975.00	354.30	\$345,442.50
Jennifer B. Kimble	Senior Counsel	2005	\$537.50	6.00	\$3,225.00
Jennifer B. Kimble	Senior Counsel	2005	\$487.50	20.10	\$9,798.75
Danielle Barav-Johnson	Counsel	2014	\$945.00	8.20	\$7,749.00
Rebecca A. Gelfand	Counsel	2002	\$1,095.00	27.60	\$30,222.00
Rebecca A. Gelfand	Counsel	2002	\$1,025.00	52.10	\$53,402.50
Lynn W. Holbert	Counsel	1988	\$1,150.00	7.30	\$8,395.00
Frank Comparetto III	Counsel	2013	\$1,100.00	0.20	\$220.00
Andrew J. Polansky	Senior Attorney	2018	\$600.00	40.90	\$24,540.00
Sameer M. Alifarag	Associate	2019	\$925.00	67.60	\$62,530.00
Sameer M. Alifarag	Associate	2019	\$820.00	126.50	\$103,730.00
Sameer M. Alifarag	Associate	2019	\$410.00	5.00	\$2,050.00
Brooke L. Nitti	Associate	2020	\$600.00	15.30	\$9,180.00
Ematchia Brown	Paraprofessional	-	\$250.00	3.30	\$825.00
Devorah Hirsch	Paraprofessional	-	\$325.00	0.60	\$195.00
Shawne M. Keenan	Paraprofessional	-	\$500.00	3.30	\$1,650.00
Cynthia Wyke-Garrett	Paraprofessional	-	\$375.00	0.50	\$187.50
<b>TOTAL</b>				<b>1,242.90</b>	<b>\$1,303,128.75</b>

**Blended Hourly Rate: \$1,048.45**

**Exhibits**

**Exhibit A – Declaration of Todd C. Meyers**

**Exhibit B – Summary of Hours and Fees by Project Category for Monthly Compensation Period and Final Compensation Period**

**Exhibit C – Summary of Hours and Fees by Professional for Monthly Compensation Period and Final Compensation Period**

**Exhibit D – Itemized Time Records by Professional and Itemized Time Records of Expenses for Final Compensation Period**

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

In re:

FULCRUM BIOENERGY, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-12008 (TMH)

(Jointly Administered)

Obj. Deadline: June 23, 2025 at 4:00 p.m. (ET)

Hearing Date: August 4, 2025 at 10:00 a.m. (ET)

**COMBINED MONTHLY AND FINAL FEE APPLICATION OF EVERSHEDS  
SUTHERLAND (US) LLP FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR THE (I) MONTHLY PERIOD  
FROM MARCH 1, 2025 THROUGH AND INCLUDING MAY 5, 2025 AND (II) FINAL  
PERIOD FROM SEPTEMBER 21, 2024 THROUGH AND INCLUDING MAY 5, 2025**

Pursuant to Sections 105(a), 330 and 331 of Title 11 of the United States Code §§ 101-1532 (the “Bankruptcy Code”),<sup>2</sup> Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), Eversheds Sutherland (US) LLP (“Eversheds”), co-counsel to the Official Committee of Unsecured Creditors (the “Committee”), hereby submits its *Combined Monthly and Final Fee Application of Eversheds Sutherland (US) LLP for Allowance of Compensation and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for the (I) Monthly Period from March 1, 2025 Through and Including May 5, 2025 and (II) Final Period from September 21, 2024 Through and Including May 5, 2025* (the “Application”) for (a) allowance of compensation

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with each debtor’s federal tax identification numbers are: Fulcrum BioEnergy, Inc. (3733); Fulcrum Sierra BioFuels, LLC (1833); Fulcrum Sierra Finance Company, LLC (4287); and Fulcrum Sierra Holdings, LLC (8498). The location of the Debtors’ service address is: Fulcrum BioEnergy Inc., P.O. Box 220 Pleasanton, CA 94566.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have their respective meanings ascribed to them in the Plan.



in the amount of \$214,520.00 and reimbursement of expenses in the amount of \$9,358.50 for the period from March 1, 2025 through and including May 5, 2025 (the “Monthly Compensation Period”) and (b) allowance of compensation in the amount of \$1,317,711.25<sup>3</sup> and reimbursement of expenses in the amount of \$30,507.62 for the period from September 21, 2024 through and including May 5, 2025 (the “Final Compensation Period”), for an aggregate total of \$1,348,218.87, in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [D.I. 170] (the “Interim Compensation Order”) and the *Order Authorizing the Retention and Employment of Eversheds Sutherland (US) LLP as Co-Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to September 21, 2024* [D.I. 188] (the “Retention Order”). In support of the Application, Eversheds submits the Declaration of Todd C. Meyers attached hereto as **Exhibit A**, and respectfully states as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the above-captioned cases (the “Chapter 11 Cases”) and this Application in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are Sections 105(a), 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

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<sup>3</sup> Pursuant to an agreement between the Committee and the Debtors in connection with the Plan, Eversheds agreed to defer twenty percent (20%) of its fees from February 1, 2025 through the Effective Date (the “Deferred Fees”). As administrative priority claims, the Deferred Fees, which amount to \$54,287.10 (20% of \$271,435.50), will be paid prior to distributions to general unsecured creditors.

### **BACKGROUND**

3. On September 9, 2024, (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

4. The Debtors have continued in possession of their property and have continued to operate and manage their businesses as Debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these Chapter 11 Cases.

5. On September 19, 2024, the United States Trustee for Region 3 (the “United States Trustee”) filed its *Notice of Appointment* of a five (5) member Committee pursuant to section 1102(a)(1) of the Bankruptcy Code. *See* D.I. 74. On September 21, 2024, the Committee selected Eversheds to serve as counsel to the Committee and Dundon Advisors, LLC (“Dundon”) to serve as its financial advisor. On September 23, 2024, the Committee selected Morris James LLP (“Morris James”) to serve as its co-counsel. On October 14, 2024, the Committee selected Layer 7 Capital, LLC (“Layer 7”) to serve as its investment banker.

6. On October 15, 2024, the Court entered the Interim Compensation Order, which established procedures by which Professionals (as defined in the Interim Compensation Order) may seek compensation for services rendered and reimbursement for expenses incurred in connection with the Chapter 11 Cases. *See* D.I. 170.

7. On October 22, 2024, the Court entered the Retention Order, approving the retention and employment of Eversheds as co-counsel to the Committee.

8. On November 22, 2024, Eversheds filed the *First Monthly Fee Application of Eversheds Sutherland (US) LLP for Allowance of Compensation and Reimbursement of Expenses*

*as Co-Counsel for the Official Committee of Unsecured Creditors for the Period from September 21, 2024 Through and Including October 31, 2024* [D.I. 283] (the “First Monthly Fee Application”), pursuant to which Eversheds requested payment by the Debtors of 80% of the fees and 100% of the expenses incurred for the period of September 21, 2024 through and including October 31, 2024. After no objection was received by the applicable objection deadline, Eversheds filed a *Certificate of No Objection* regarding the First Monthly Fee Application. D.I. 306. Thereafter, subject to any modifications agreed to by Eversheds and the Court, the Debtors remitted the payment requested by Eversheds under the First Monthly Fee Application.

9. On December 13, 2024, Eversheds filed the *Second Monthly Fee Application of Eversheds Sutherland (US) LLP for Allowance of Compensation and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period from November 1, 2024 Through and Including November 30, 2024* [D.I. 312] (the “Second Monthly Fee Application”), pursuant to which Eversheds requested payment by the Debtors of 80% of the fees and 100% of the expenses incurred for the period from November 1, 2024 through and including November 30, 2024. After no objection was received by the applicable objection deadline, Eversheds filed a *Certificate of No Objection* regarding the Second Monthly Fee Application. D.I. 339. Thereafter, subject to any modifications agreed to by Eversheds and the Court, the Debtors remitted the payment requested by Eversheds under the Second Monthly Fee Application.

10. On December 27, 2024, Eversheds filed the *First Interim Fee Application of Eversheds Sutherland (US) LLP for Allowance of Compensation and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for the Period from September 21, 2024 Through and Including November 30, 2024* [D.I. 335] (the “First Interim Fee Application”), pursuant to which Eversheds requested interim allowance and payment of

compensation in the amount of \$720,668.25 and reimbursement of expenses in the amount of \$18,346.22 for an aggregate total of \$739,014.47 (comprising fees and expenses under the First Monthly Fee Application, the Second Monthly Fee Application, and the twenty percent (20%) holdbacks thereunder). After no objection was received by the applicable objection deadline, Eversheds filed a *Certificate of No Objection* regarding the First Interim Fee Application. D.I. 374. Thereafter, on January 17, 2025, the Court entered the *First Omnibus Order Granting Interim Allowance of Fees and Expenses for Certain Professionals* [D.I. 393] (the “First Omnibus Fee Order”), granting interim allowance of fees and expenses requested under the First Interim Fee Application and other interim fee applications prepared by estate professionals, subject to certain modifications.<sup>4</sup>

11. On February 24, 2025, Eversheds filed the *Combined Third Monthly Fee Application of Eversheds Sutherland (US) LLP for Allowance of Compensation and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for the Period from December 1, 2024 Through and Including January 31, 2025* [D.I. 442] (the “Third Monthly Fee Application”), pursuant to which Eversheds requested payment by the Debtors of 80% of the fees and 100% of the expenses incurred for the period from December 1, 2024 through and including January 31, 2025. After no objection was received by the applicable objection deadline, Eversheds filed a *Certificate of No Objection* regarding the Third Monthly Fee Application. D.I. 465, amended at D.I. 475. Thereafter, subject to any modifications agreed to by Eversheds and the Court, the Debtors remitted the payment requested by Eversheds under the Third Monthly Fee Application.

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<sup>4</sup> As set forth in the First Omnibus Fee Order, Eversheds agreed to a voluntary fee reduction of \$785.00 of the amounts requested in its First Interim Fee Application.

12. On March 26, 2025, Eversheds filed the *Fourth Monthly Fee Application of Eversheds Sutherland (US) LLP for Allowance of Compensation and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for the Period from February 1, 2025 Through and Including February 28, 2025* [D.I. 499] (the “Fourth Monthly Fee Application”), pursuant to which Eversheds requested payment by the Debtors of 80% of the fees and 100% of the expenses incurred for the period from February 1, 2025 through and including February 28, 2025. After no objection was received by the applicable objection deadline, Eversheds filed a *Certificate of No Objection* regarding the Fourth Monthly Fee Application. D.I. 530. Thereafter, subject to any modifications agreed to by Eversheds and the Court, the Debtors remitted the payment requested by Eversheds under the Fourth Monthly Fee Application.

13. On April 14, 2025, the Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming the Second Amended Joint Chapter 11 Plan of Liquidation* [D.I. 550] (the “Confirmation Order”), which confirmed the *Second Amended Joint Chapter 11 Plan* [D.I. 548-1] (as amended, supplemented, or otherwise modified, the “Plan”).

14. On May 5, 2025 (the “Effective Date”), the Plan went into effect in accordance with its terms. *See Notice of (I) Entry of Order Confirming Debtors’ Second Amended Joint Chapter 11 Plan of Liquidation and (II) Occurrence of Effective Date* [D.I. 575] (the “Effective Date Notice”).

### **RELIEF REQUESTED**

15. By this Application, Eversheds seeks entry of an order, (a) allowing Eversheds compensation in the amount of \$214,520.00 for legal services rendered to the Committee and reimbursement of expenses in the amount of \$9,358.50 for an aggregate total of \$223,878.50 for the Monthly Compensation Period; (b) allowing Eversheds compensation in the amount of

\$1,317,711.25, for legal services rendered to the Committee, and reimbursement of expenses in the amount of \$30,507.62 for an aggregate total of \$1,348,218.87<sup>5</sup> for the Final Compensation Period; (c) authorizing and directing the Debtors to pay Eversheds \$1,317,711.25 for compensation for legal services and \$30,507.62 for reimbursement of expenses for an aggregate total of \$1,348,218.87, less (x) amounts that have already been paid and (y) the Deferred Fees; and (c) granting such other and further relief that the Court deems just and proper.

**SUMMARY OF PROFESSIONAL COMPENSATION  
AND REIMBURSEMENT OF EXPENSES**

16. All services for which compensation is requested by Eversheds were performed for or on behalf of the Committee, and Eversheds expended a total of 1,242.90 hours during the Final Compensation Period for which compensation is requested.

17. During the Final Compensation Period and except as disclosed herein, Eversheds has received no payment and no promises of payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Eversheds and any other person for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

18. The fees charged by Eversheds in these Chapter 11 Cases are billed in accordance with the Retention Order and are comparable to those fees charged by Eversheds for professional services rendered in connection with similar chapter 11 cases and non-bankruptcy matters. Eversheds submits that such fees are reasonable based upon the customary compensation charged by similarly skilled practitioners in comparable bankruptcy cases and non-bankruptcy matters in a competitive national market. Other than as may be disclosed herein, Eversheds did not agree to

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<sup>5</sup> This total amount includes estimated fees in the amount of \$14,582.50 for preparing, filing and seeking final approval of this Application.

any variations from, or alternatives to, its standard or customary billing arrangements in connection with the services rendered during the Final Compensation Period.

19. Attached hereto as **Exhibit B** is a summary by project category of the services performed by Eversheds during the Monthly Compensation Period and Final Compensation Period.

20. Attached hereto as **Exhibit C** is a summary setting forth all Eversheds professionals who have performed services during the Monthly Compensation Period and Final Compensation Period, the title for each professional, year of admission to practice, individual hourly rate, and the aggregate number of hours expended by each professional during the Monthly Compensation Period and Final Compensation Period.

21. Attached hereto as **Exhibit D** are Eversheds' itemized time records detailing (a) the time records of Eversheds professionals during the Final Compensation Period, organized in project billing categories in accordance with the United States Trustee's *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 "**Appendix B Guidelines**"), and maintained pursuant to Eversheds computerized time records of the time spent by all professionals in connection with its representation of the Committee, and (b) expenses incurred during the Final Compensation Period. As set forth in **Exhibit D**, Eversheds professionals expended a total of 1,242.90 hours during the Final Compensation Period for which compensation is requested. All time entries and requested expenses are in compliance with Local Rule 2016-1.

**SUMMARY OF PROFESSIONAL SERVICES RENDERED**

22. Among other things, the Plan provides that “all entities seeking an award by the [] Court of Fee Claims (i) shall file their respective final applications for allowance of compensation for services rendered and reimbursement of expenses incurred by the date that is forty-five (45) days after the Effective Date” (or June 19, 2025), with objections, if any, to be filed no later than twenty (20) calendar days after the filing of such fee application. Plan, at ¶ 21.

23. In accordance with the Interim Compensation Order, the Plan, the Confirmation Order, and the Effective Date Notice, Eversheds served upon the Debtors and other parties in interest this Application regarding its fees and expenses incurred during the Monthly Compensation Period and Final Compensation Period, which encompasses Eversheds’ request for final allowance of compensation for services rendered and reimbursement of expenses since its retention in these chapter 11 cases through and including the Effective Date.

24. All services rendered and all costs incurred for which compensation and reimbursement are requested by Eversheds in this Application were reasonable, necessary and appropriate and were performed for or incurred on behalf of the Committee during the Monthly Compensation Period and Final Compensation Period. In addition, Eversheds worked closely with the Committee’s co-counsel, Morris James, the Committee’s financial advisor, Dundon, and the Committee’s investment banker, Loyer 7, to ensure that there was no duplication of services and that all matters were appropriately and diligently handled for the Committee in a timely and efficient manner.

25. The following is a summary of professional services rendered by Eversheds during the Monthly Compensation Period and Final Compensation Period.



**A. Asset Disposition (BK 110)****Fees: \$360,761.00****Total Hours: 330.20**

26. This billing category encompasses services related to active participation in the sales of the Debtors' assets, including the Debtors' biorefinery facility and feedstock assets (collectively, the "Facility Assets"). During the Chapter 11 Cases, the Debtors proposed and the Court approved sales of the Facility Assets after a comprehensive marketing, bidding and auction process. *See* D.I. 264, 265. Eversheds was actively involved in negotiating the bidding procedures and the sale timeline with the Debtors. Eversheds coordinated with the Committee's financial advisor and investment banker, Dundon and Layer 7, respectively, to market the Debtors' Facility Assets to potentially interested bidders during the final period between entry of the *Order Pursuant to Sections 105, 363, 364, 365 and 541 of the Bankruptcy Code, Bankruptcy Rules 2002, 6004, 6006 and 9007 and Del. Bankr. L.R. 2002-1 and 6004-1 (A) Approving Bidding Procedures for the Sale of Substantially All of the Debtors' Assets; (B) Approving the Debtors' Entry Into Stalking Horse Agreement and Related Bid Protections; (C) Approving Procedures for the Assumption and Assignment or Rejection of Designated Executory Contracts and Unexpired Leases; (D) Scheduling an Auction and Sale Hearing; (E) Approving Forms and Manner of Notice of Respective Dates, Times, and Places in Connection Therewith; and (F) Granting Related Relief* [D.I. 153] (the "Bidding Procedures Order") and the auction held pursuant to the Bidding Procedures Order. Eversheds subsequently worked with the Debtors and other parties to ensure that the sales of the Facility Assets closed.

27. This time category also encompasses time incurred by Eversheds with respect to the sale of the Fulcrum Bioenergy Inc. assets (collectively the "Parent Assets") to PCL Administration LLC ("PCL") and the sale of certain can/catalyst assets to Johnson Matthey PLC.

As part of the Sale of the Parent Assets, Eversheds attended multiple sale hearings and worked with the other Committee professionals and the Debtors' professionals to ensure that the sale of the Parent Assets and the sale of the cans/catalysts preserved sufficient value for the Fulcrum Bioenergy, Inc. estate.

28. Additionally, Eversheds extensively engaged with the Debtors and other interested parties regarding the terms and conditions of the Court-approved sale of equity owned by Fulcrum BioEnergy, Inc. pursuant to the *Debtors' Motion for Entry of an Order (I) Authorizing the Sale of Certain of the Debtors' Assets Free and Clear of All Encumbrances; (II) Approving the Debtors' Entry Into the Stock Purchase Agreement; and (III) Granting Related Relief* [D.I. 496].

29. Eversheds' participation also included, *inter alia*, (i) filing an objection to the originally proposed bidding procedures, (ii) negotiations with Debtors' counsel and other interested parties in connection therewith, (iii) coordinating with the Committee and other Committee professionals on strategies to resolve issues in connection with the same, (iv) reviewing bids and the proposed forms of asset and stock purchase agreements, (v) attending the auction held pursuant to the Bidding Procedures Order, (vi) attending the sale hearings on November 12 and 13, 2024 and April 14, 2025, (vii) negotiating and reviewing the provisions of sale orders; (viii) coordinating with the Debtors' professionals and other interested parties in connection with the sales proceeds waterfall, and (ix) analyzing potential contract assumption and rejection issues.

#### **B. Case Administration and Analysis (BK 130)**

**Fees: \$72,256.00**

**Total Hours: 70.50**

30. This billing category encompasses services related to general case administration including, *inter alia*, review and providing comments on the Debtors' first day pleadings and relief granted in relation thereto, reviewing the Debtors' schedules of assets and liabilities and statements

of financial affairs, developing the Committee's case strategy and communicating with the Committee's other professionals regarding the same. This billing category also encompasses time expended on (i) preparing and sending informal document requests to the Debtors in connection with discovery taken during the Final Compensation Period, and (ii) the transition to the Effective Date.

**C. Claims Administration and Objections (BK 140)**

**Fees: \$14,883.50**

**Total Hours: 14.40**

31. This billing category encompasses services related to the Debtors' claim pool in the Chapter 11 Cases, including analyses of claims at each individual Debtor, analyses of the conversion of parent debt into equity, review of Omnibus claim objections, and the impacts of certain mechanic lien claims on the claim pool.

**D. Lien Investigation (BK 141)**

**Fees: \$148,078.00**

**Total Hours: 142.90**

32. This billing category encompasses services related to the Committee's review of and diligence concerning the existence, validity, priority and extent of alleged liens against the Debtors' assets. The investigation encompassed an analysis of the Debtors' credit facilities and assets at both the parent and subsidiary levels, review of applicable debt instruments and related documents, review of any potential unencumbered assets, research related thereto, and correspondence with the Committee's other professionals, counsel to the Debtors, and negotiations with counsel to the bondholders and PCL regarding lien perfection issues.

**E. Fee/Employment Applications (BK 160)**

**Fees: \$81,025.50**

**Total Hours: 85.30**

33. This billing category encompasses services related to the employment and compensation of various of the Committee's professionals, including, *inter alia*, (i) drafting and filing a retention application for Eversheds, (ii) reviewing and revising retention applications of Dundon and Layer 7, (iii) review and analysis of the *Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [D.I. 90] (the "Interim Compensation Motion"), (iv) and drafting and filing fee applications, including the First Interim Fee Application and this final Application, in accordance with the Interim Compensation Order, the Plan, and the Confirmation Order.

**F. Fee/Employment Objections (BK 170)**

**Fees: \$10,587.00**

**Total Hours: 11.00**

34. This billing category encompasses services rendered in connection with the review and analysis of the fee and retention applications filed by the Debtors' professionals in these Chapter 11 Cases.

**G. Financing (BK 180)**

**Fees: \$183,445.00**

**Total Hours: 169.80**

35. This billing category encompasses services rendered related to *Debtors' Emergency Motion for Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503 and 507 (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Bondholders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief* [D.I. 11] (the "DIP

Motion”). Upon its retention, Eversheds immediately reviewed and analyzed the terms of the proposed DIP financing and expended significant time negotiating with the Debtors, bondholders and the DIP lender regarding the final DIP order and preparing an objection to the DIP Motion. The Debtors, the DIP lender, and the Committee were ultimately able to reach a consensual resolution of the Committee’s objection regarding the proposed DIP financing and form of order approving the DIP loan, which was reflected in the final order approving the DIP Motion [D.I. 150] (as amended, the “Final DIP Order”). The settlement reflected in the Final DIP Order ensured that in the event of a successful sale process, certain excess sale proceeds would be unencumbered and available for the Debtors’ estates and, potentially, unsecured creditors. The services rendered in connection therewith include, *inter alia*, reviewing and analyzing the proposed DIP Facility, the interim order approving the DIP Motion and related budget, negotiations with the Debtors, bondholders and DIP lender over various provisions of the DIP Facility, drafting an objection to the DIP Motion, preparing discovery requests, conducting depositions of the Debtors’ investment banker (DSI) and the Debtors’ chief restructuring officer, defending the deposition of the Committee’s financial advisor, negotiating and documenting the terms of a settlement between the Debtors and bondholders as discussed above, providing comments on several iterations of the proposed final DIP order, preparing and participating in the DIP hearing, and corresponding with the Committee’s other professionals, the Debtors’ counsel, the bondholders’ counsel and the DIP lender’s counsel regarding various financing issues and settlement.

#### **H. Litigation General (BK 190)**

**Fees: \$49,772.50**

**Total Hours: 58.40**

36. This billing category encompasses services rendered related to (i) general document review in response to Committee document requests and (ii) the Committee’s potential

consideration and preparation for a conversion of the Chapter 11 Cases to cases under chapter 7 of the Bankruptcy Code. Among other things, these services include drafting a motion to convert and conducting legal research in connection with the same, and conducting an in-depth review of documents produced by the Debtors in order to evaluate plan releases and purchase of claims by PCL.

**I. Meeting of Creditors (BK 200)**

**Fees: \$103,746.50**

**Total Hours: 96.40**

37. This billing category encompasses services rendered related to meetings of the Committee. For each meeting, Eversheds prepared and circulated an agenda and other relevant materials in advance to foster productive discussions on relevant case issues. Eversheds also corresponded regularly via email with the Committee and its other professionals regarding the status of settlement negotiations with the Debtors and their lenders, pleadings filed and to be filed, the outcomes of hearings, the Debtors' sale process, and other pertinent matters pending before the Court. This category also includes discussions with individual committee members and creditors regarding various case issues. Furthermore, this billing category also encompasses time spent on various administrative matters on behalf of the Committee, such as drafting Committee Bylaws and negotiating a non-disclosure agreement with the Debtors.

**J. Plan and Disclosure Statement (BK 210)**

**Fees: \$230,607.50**

**Total Hours: 195.20**

38. This billing category encompasses services rendered related to review and analysis of and attention to matters regarding the Plan and the Effective Date of the Plan, including, but not limited to, (a) reviewing the Plan, the Disclosure Statement, the Liquidation Trust Agreement, the Confirmation Order, and documents filed in connection with the same (collectively, the "Plan-

Related Documents”), (b) drafting revisions and comments to the Plan-Related Documents, (c) preparation for and attendance at the Plan confirmation hearing, (d) coordination with the Committee’s financial advisor and other professionals on the implications of proposed Plan treatment to the unsecured creditor constituency, (e) coordination with other Committee professionals regarding post-Effective Date operations of the Liquidation Trust, and (f) coordination with other estate professionals regarding the general transition to the Plan’s Effective Date.

**K. Relief from Stay Proceedings (BK 220)**

**Fees: \$4,864.00**

**Total Hours: 4.90**

39. This billing category encompasses services rendered related to, *inter alia*, reviewing and analyzing motions seeking relief from the automatic stay and pleadings related thereto, namely the motion for relief from stay filed by TRI General Improvement District and the Nevada Department of Taxation.

**L. Travel Time (BK 310)**

**Fees: \$32,276.75**

**Total Hours: 54.70**

40. This billing category encompasses non-working attorney travel time to and from Delaware to attend hearings and the auction for the Debtors’ assets held pursuant to the Bidding Procedures Order. In accordance with the Local Rules, all travel time is billed at half rate.

**M. Insurance (BK 900)**

**Fees: \$10,825.50**

**Total Hours: 9.20**

41. This billing category encompasses services rendered related to, *inter alia*, reviewing the Debtors’ prepetition insurance policies, including director and officer liability coverage, and corresponding with Debtors’ and other Committee professionals regarding the same.

**EXPENSES**

42. Eversheds incurred reasonable, necessary and documented expenses in the amount of \$30,507.62 during the Final Compensation Period in connection with its representation of the Committee. Expenses incurred include, but are not limited to, charges for travel, airfare, lodging, lien searches and deposition transcription services.

**BASIS FOR THE RELIEF REQUESTED**

43. Section 330(a)(1) of the Bankruptcy Code provides for the payment of:

(A) Reasonable compensation for actual, necessary services rendered by the trustee, examiner, professional person, or attorney and by any paraprofessional person employed by any such person; and

(B) Reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a)(1).

44. Section 330 sets forth the criteria for the award of compensation and reimbursement:

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, 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 case 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). Reasonableness of compensation is determined by a “market-driven approach” which considers the nature, extent and value of services provided by the professional and cost of comparable services in non-bankruptcy contexts. *See Zolfo Cooper & Co. v. Sunbeam-Oster Co.*, 50 F.3d 253, 258 (3d Cir. 1995); *In re Busy Beaver Building Ctr., Inc.*, 19 F.3d 833, 849 (3d Cir. 1994). Thus, the “baseline rule is for firms to receive their customary rates.” *Zolfo Cooper*, 50 F.3d at 259.

45. Eversheds has calculated its compensation requested in this Application by applying its standard hourly rates. Eversheds’ calculation is based upon hourly rates that are well within the range of rates that are charged by comparable firms in similar bankruptcy cases. Accordingly, Eversheds’ rates should be determined to be reasonable under section 330 of the Bankruptcy Code.

46. Eversheds’ fees during the Monthly Compensation Period and Final Compensation Period are also reasonable under the prevailing legal standard and should be allowed. The amount of these fees is not unusual given the complexity, accelerated deadlines, and size of these Chapter 11 Cases. Eversheds’ fees are commensurate with fees that other attorneys of comparable experience and expertise have charged and been awarded in similar chapter 11 cases. Accordingly, Eversheds’ fees are reasonable pursuant to section 330 of the Bankruptcy Code.

47. Section 330(a)(1)(B) of the Bankruptcy Code permits reimbursement for actual, necessary expenses. Eversheds’ legal services and expenses incurred during the Monthly Compensation Period and Final Compensation Period are set forth in this Application and constitute only those necessary expenses that were incurred for the benefit of the Committee.

Eversheds has properly requested reimbursement of only actual, necessary, and appropriate legal expenses.

48. As set forth herein, except as permitted by Bankruptcy Rule 2016, no agreement or understanding exists between Eversheds and/or any third person for the sharing or division of compensation in connection with the Chapter 11 Cases. All of the services for which compensation is requested in this Application were rendered at the request of and solely on behalf of the Committee.

49. Pursuant to the standards set forth in Sections 330 and 331 of the Bankruptcy Code, Eversheds submits that the compensation requested is for actual and necessary services and expenses and is reasonable based upon the nature, extent, and value of such services, the time spent thereon, the quality and skill which the situation required, and the costs of comparable services in a case under the Bankruptcy Code. When two or more professionals participated in any activity, such joint participation was necessary as a result of either the complexity of the problems involved, the need to familiarize each professional with the matters at issue so that each professional could perform further necessary work, or the expedited nature of these Chapter 11 Cases. Eversheds submits, therefore, that its fees and expenses were actual, necessary, reasonable, and justified, and should be allowed in full.

**ATTORNEY STATEMENT PURSUANT TO APPENDIX B GUIDELINES**

50. The following is provided in response to the request for additional information set forth in ¶ C.5 of the Appendix B Guidelines.

Question: 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? If so, please explain.

Response: No. However, for the avoidance of doubt and in accordance with the Local Rules and Appendix B Guidelines, Eversheds billed travel time at ½ regular billable rates.

Question: If the fees sought in this 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?

Response: Not applicable.

Question: Have any of the professionals included in this fee application varied their hourly rate based on geographic location of the bankruptcy case?

Response: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.

Response: No.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: If the fee application includes any rate increase since retention:

- i. Did your client review and approve those rate increases in advance?
- ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458.

Response: This Application includes a rate increase since Applicant's retention. Applicant's rates were subject to a customary, firm-wide "step-up" on January 1, 2025. The Committee has reviewed, approved and agreed to the rate increase and the Notice of Rate Increase was filed on the docket in the Chapter 11 Cases [D.I. 331].

**NOTICE AND NO PRIOR APPLICATION**

51. Notice of this Application has been provided to the Notice Parties identified in the Interim Compensation Order. Eversheds submits that no further or other notice need be given.

52. No previous application for the relief sought herein has been made to this or any other Court.

**CONCLUSION**

53. Eversheds has necessarily and properly recorded 1,242.90 hours of services in the performance of its duties as co-counsel to the Committee during the Final Compensation Period.

**WHEREFORE**, Eversheds respectfully requests that this Court enter an order: (a) allowing Eversheds compensation in the amount of \$1,317,711.25 for legal services rendered to the Committee, and reimbursement of expenses in the amount of \$30,507.62, for an aggregate total of \$1,348,218.87, with respect to the Final Compensation Period; (b) authorizing and directing the Debtors to pay Eversheds \$1,317,711.25 for legal services rendered to the Committee (including any 20% holdbacks withheld pursuant to previously filed monthly fee applications), and \$30,507.62 for reimbursement of expenses, for an aggregate total of \$1,348,218.87, less (x) amounts that have already been paid and (y) the Deferred Fees; and (c) granting such other and further relief that the Court deems just and proper.

*[Remainder of this Page Intentionally Left Blank]*

Dated: June 3, 2025

**EVERSHEDS SUTHERLAND (US) LLP**

/s/ Todd C. Meyers

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-and-

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Jennifer B. Kimble (admitted *pro hac vice*)  
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*Co-Counsel to the Official Committee of Unsecured  
Creditors*

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

In re:

FULCRUM BIOENERGY, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-12008 (TMH)

(Jointly Administered)

**Obj. Deadline: June 23, 2025 at 4:00 p.m. (ET)**

**Hearing Date: August 4, 2025 at 10:00 a.m. (ET)**

**NOTICE OF COMBINED MONTHLY AND FINAL FEE APPLICATION OF  
EVERSHEDS SUTHERLAND (US) LLP FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR THE (I) MONTHLY PERIOD  
FROM MARCH 1, 2025 THROUGH AND INCLUDING MAY 5, 2025 AND (II) FINAL  
PERIOD FROM SEPTEMBER 21, 2024 THROUGH AND INCLUDING MAY 5, 2025**

**PLEASE TAKE NOTICE** that, on June 3, 2025, Eversheds Sutherland (US) LLP (“Eversheds”), co-counsel to the Official Committee of Unsecured Creditors (the “Committee”), filed the *Combined Monthly and Final Fee Application of Eversheds Sutherland (US) LLP for Allowance of Compensation and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for the (I) Monthly Period from March 1, 2025 Through and Including May 5, 2025 and (II) Final Period from September 21, 2024 Through and Including May 5, 2025* (the “Application”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”) and served notice of the Application in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [D.I. 170] (the “Interim Compensation Order”), the *Second Amended Joint Chapter 11 Plan* [D.I. 548-1] (as amended, supplemented, or otherwise modified, the “Plan”), and the *Findings of Fact, Conclusions of Law, and Order Confirming the Second Amended Joint Chapter 11 Plan of Liquidation* [D.I. 550] (the “Confirmation Order”).

**PLEASE TAKE FURTHER NOTICE** that the Application requests final allowance and payment of (i) \$1,317,711.25 in fees for services rendered<sup>2</sup> and (ii) \$30,507.62 for reasonable and necessary expenses incurred by Eversheds for the period from September 21, 2024 through and including May 5, 2025.

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with each debtor’s federal tax identification numbers are: Fulcrum BioEnergy, Inc. (3733); Fulcrum Sierra BioFuels, LLC (1833); Fulcrum Sierra Finance Company, LLC (4287); and Fulcrum Sierra Holdings, LLC (8498). The location of the Debtors’ service address is: Fulcrum BioEnergy Inc., P.O. Box 220 Pleasanton, CA 94566.

<sup>2</sup> Pursuant to an agreement between the Committee and the Debtors in connection with the Plan, Eversheds agreed to defer twenty percent (20%) of its fees from February 2025 through the Effective Date (the “Deferred Fees”). As administrative priority claims, the Deferred Fees, which amount to \$54,287.10, will be paid prior to distributions to general unsecured creditors.

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Application must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure, the Local Rules of Practice and Procedure for the United States Bankruptcy Court for the District of Delaware, the Interim Compensation Order, the Plan, the Confirmation Order, filed with the Bankruptcy Court, and served upon, so as to be received by, the undersigned counsel on or before **June 23, 2025, at 4:00 p.m. (ET)**. Only properly and timely filed responses will be considered.

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the Application is scheduled for **August 4, 2025, at 10:00 a.m. (ET)** before the Honorable Thomas M. Horan, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3<sup>rd</sup> floor, Courtroom #7, Wilmington, Delaware 19801.

*[Remainder of Page Intentionally Left Blank]*

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

Dated: June 3, 2025  
Wilmington, Delaware

**MORRIS JAMES LLP**

/s/ Eric J. Monzo  
Jeffrey R. Waxman (DE Bar No. 4159)  
Eric J. Monzo (DE Bar No. 5214)  
Christopher M. Donnelly (DE Bar No. 7149)  
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-and-

Todd C. Meyers (admitted *pro hac vice*)  
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*Counsel to the Official Committee of Unsecured Creditors*



**EXHIBIT “A”**

**DECLARATION OF TODD C. MEYERS**

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

In re:

FULCRUM BIOENERGY, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-12008 (TMH)

(Jointly Administered)

**DECLARATION OF TODD C. MEYERS IN SUPPORT OF COMBINED MONTHLY  
AND FINAL FEE APPLICATION OF EVERSHEDS SUTHERLAND (US) LLP FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES AS  
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR THE (I) MONTHLY PERIOD FROM MARCH 1, 2025 THROUGH AND  
INCLUDING MAY 5, 2025 AND (II) FINAL PERIOD FROM SEPTEMBER 21, 2024  
THROUGH AND INCLUDING MAY 5, 2025**

I, Todd C. Meyers, under penalty of perjury declare as follows:

1. I am a partner in the law firm of Eversheds Sutherland (US) LLP (“Eversheds”), co-counsel for the Official Committee of Unsecured Creditors (the “Committee”).

2. I have read the *Combined Monthly and Final Fee Application of Eversheds Sutherland (US) LLP for Allowance of Compensation and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for the (I) Monthly Period from March 1, 2025 Through and Including May 5, 2025 and (II) Final Period from September 21, 2024 Through and Including May 5, 2025* and know the contents thereof. The same contents are true to the best of my knowledge, except as to matters therein alleged to be upon information and belief, and as to those matters, I believe them to be true. I have personally performed many of the

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with each debtor’s federal tax identification numbers are: Fulcrum BioEnergy, Inc. (3733); Fulcrum Sierra BioFuels, LLC (1833); Fulcrum Sierra Finance Company, LLC (4287); and Fulcrum Sierra Holdings, LLC (8498). The location of the Debtors’ service address is: Fulcrum BioEnergy Inc., P.O. Box 220 Pleasanton, CA 94566.

legal services rendered by Eversheds and am thoroughly familiar with all other work performed on behalf of the Committee by the attorneys and paraprofessionals at Eversheds.

3. In accordance with Rule 2016(a) of the Federal Rules of Bankruptcy Procedure and Section 504 of Title 11 of the United States Code, no agreement or understanding exists between Eversheds and any other person for the sharing of compensation to be received in connection with the above-captioned cases.

4. I have reviewed the requirements of Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and to the best of my knowledge, information and belief, this Application complies with Local Rule 2016-1.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 3, 2025

/s/ Todd C. Meyers  
Todd C. Meyers

**EXHIBIT "B"****COMPENSATION BY PROJECT CATEGORY****(MONTHLY COMPENSATION PERIOD)**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
BK 110 - Asset Disposition	26.90	\$32,875.00
BK 130 – Case Administration and Analysis	9.90	\$10,057.50
BK 140 – Claims Administration and Objections	3.00	\$3,555.00
BK 141 – Lien Investigation	1.30	\$1,547.50
BK 160 – Fee/ Employment Applications	9.30	\$9,232.50
BK 170 - Fee/ Employment Objections	1.50	\$1,537.50
BK 180 – Financing	1.90	\$2,087.50
BK 190 – Litigation General	0.50	\$672.50
BK 200 – Meetings of Creditors	14.40	\$16,755.00
BK 210 – Plan and Disclosure Statement	107.10	\$127,312.50
BK 220 – Relief from Stay Proceedings	0.90	\$1,087.50
BK 310 – Travel Time	12.00	\$7,800.00
<b>TOTAL</b>	<b>188.70</b>	<b>\$214,520.00</b>

**(FINAL COMPENSATION PERIOD)**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
BK 110 - Asset Disposition	330.20	\$360,761.00
BK 130 – Case Administration and Analysis	70.50	\$72,256.00
BK 140 – Claims Administration and Objections	14.40	\$14,883.50
BK 141 – Lien Investigation	142.90	\$148,078.00
BK 160 – Fee/ Employment Applications	85.30	\$81,025.50
BK 170 - Fee/ Employment Objections	11.00	\$10,587.00
BK 180 – Financing	169.80	\$183,445.00
BK 190 – Litigation General	58.40	\$49,772.50
BK 200 – Meetings of Creditors	96.40	\$103,746.50
BK 210 – Plan and Disclosure Statement	195.20	\$230,607.50
BK 220 – Relief from Stay Proceedings	4.90	\$4,864.00
BK 310 – Travel Time	54.70	\$32,276.75
BK 900 – Insurance	9.20	\$10,825.50
<b>TOTAL</b>	<b>1,242.90</b>	<b>\$1,303,128.75</b>

**EXHIBIT “C”****SUMMARY OF BILLING BY PROFESSIONAL****(MONTHLY COMPENSATION PERIOD)**

<b>Name of Attorney or Other Professional</b>	<b>Title</b>	<b>Year Admitted to Practice</b>	<b>Hourly Rate</b>	<b>Hours Billed</b>	<b>Total Individual Fees</b>
Todd C. Meyers	Partner	1991	\$1,525.00	47.00	\$71,675.00
Todd C. Meyers	Partner	1991	\$762.50	6.00	\$4,575.00
Robert S. Chase II	Partner	1997	\$1,550.00	0.60	\$930.00
Rob Ellis	Partner	2011	\$1,200.00	3.90	\$4,680.00
Jennifer B. Kimble	Senior Counsel	2005	\$1,075.00	90.60	\$97,395.00
Jennifer B. Kimble	Senior Counsel	2005	\$537.50	6.00	\$3,225.00
Frank Comparetto III	Counsel	2013	\$1,100.00	0.20	\$220.00
Sameer M. Alifarag	Associate	2019	\$925.00	34.40	\$31,820.00
<b>TOTAL</b>				<b>188.70</b>	<b>\$214,520.00</b>

**Blended Hourly Rate: \$1,136.83**

**(FINAL COMPENSATION PERIOD)**

<b>Name of Attorney or Other Professional</b>	<b>Title</b>	<b>Year Admitted to Practice</b>	<b>Hourly Rate</b>	<b>Hours Billed</b>	<b>Total Individual Fees</b>
Kathleen D. Boyle	Partner	1983	\$965.00	6.60	\$6,369.00
John J. Busillo	Partner	1984	\$995.00	13.10	\$13,034.50
Todd C. Meyers	Partner	1991	\$1,525.00	96.80	\$147,620.00
Todd C. Meyers	Partner	1991	\$1,435.00	176.00	\$252,560.00
Todd C. Meyers	Partner	1991	\$762.50	6.00	\$4,575.00
Todd C. Meyers	Partner	1991	\$717.50	17.60	\$12,628.00
David A. Wender	Partner	2003	\$1,100.00	0.70	\$770.00
Robert S. Chase II	Partner	1997	\$1,550.00	0.60	\$930.00
Rob Ellis	Partner	2011	\$1,200.00	3.90	\$4,680.00
Eric Fenichel	Senior Counsel	1986	\$1,400.00	0.20	\$280.00
Eric Fenichel	Senior Counsel	1986	\$1,300.00	0.20	\$260.00
Jennifer B. Kimble	Senior Counsel	2005	\$1,075.00	182.40	\$196,080.00
Jennifer B. Kimble	Senior Counsel	2005	\$975.00	354.30	\$345,442.50
Jennifer B. Kimble	Senior Counsel	2005	\$537.50	6.00	\$3,225.00
Jennifer B. Kimble	Senior Counsel	2005	\$487.50	20.10	\$9,798.75
Danielle Barav-Johnson	Counsel	2014	\$945.00	8.20	\$7,749.00
Rebecca A. Gelfand	Counsel	2002	\$1,095.00	27.60	\$30,222.00
Rebecca A. Gelfand	Counsel	2002	\$1,025.00	52.10	\$53,402.50
Lynn W. Holbert	Counsel	1988	\$1,150.00	7.30	\$8,395.00
Frank Comparetto III	Counsel	2013	\$1,100.00	0.20	\$220.00
Andrew J. Polansky	Senior Attorney	2018	\$600.00	40.90	\$24,540.00
Sameer M. Alifarag	Associate	2019	\$925.00	67.60	\$62,530.00
Sameer M. Alifarag	Associate	2019	\$820.00	126.50	\$103,730.00
Sameer M. Alifarag	Associate	2019	\$410.00	5.00	\$2,050.00
Brooke L. Nitti	Associate	2020	\$600.00	15.30	\$9,180.00
Ematchia Brown	Paraprofessional	-	\$250.00	3.30	\$825.00
Devorah Hirsch	Paraprofessional	-	\$325.00	0.60	\$195.00
Shawne M. Keenan	Paraprofessional	-	\$500.00	3.30	\$1,650.00
Cynthia Wyke-Garrett	Paraprofessional	-	\$375.00	0.50	\$187.50
<b>TOTAL</b>				<b>1,242.90</b>	<b>\$1,303,128.75</b>

**Blended Hourly Rate: \$1,048.45**

**EXHIBIT “D”**

**ITEMIZED TIME RECORDS BY PROFESSIONAL AND ITEMIZED TIME RECORDS  
OF EXPENSES FOR FINAL COMPENSATION PERIOD**

EVERSHEDS  
SUTHERLAND

**Eversheds Sutherland (US) LLP**

999 Peachtree Street NE  
Suite 2300  
Atlanta, GA 30309-3996

T: +1 404 853 8000

eversheds-sutherland.com

IRS Employer ID No: 58-0619407

**Electronic Remittance Instructions:**

Bank Name: Wells Fargo Bank, N.A.  
Acct Name: Eversheds Sutherland (US) LLP  
Acct Number: [REDACTED]  
Wire Routing/ABA: [REDACTED]  
ACH Routing: [REDACTED]  
SWIFT Code: [REDACTED]

**Check Remittance Instructions:**

Eversheds Sutherland (US) LLP  
PO Box 931885  
Atlanta, GA 31193-1885

**Fulcrum Official Committee  
c/o Luke Murley  
1201 North Market Street, Suite 2300  
Wilmington, DE 19801**

Bill No. 1322410  
Bill Date November 20, 2024

**Matter No: 98061.0001  
RE: Fulcrum**

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**FOR LEGAL SERVICES RENDERED THROUGH October 31, 2024**

<b>Fees</b>	<b>\$532,063.00</b>
<b>Total Current Disbursements</b>	<b>\$14,499.11</b>
<b>Total Current Bill</b>	<b>\$546,562.11</b>



**FOR LEGAL SERVICES RENDERED THROUGH October 31, 2024****FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK110 - Asset Disposition</b>					
09/21/24	Jennifer B. Kimble	Work on Sale issue list.	BK110	0.40	390.00
09/22/24	Jennifer B. Kimble	Review notes and compile into sale issue list.	BK110	0.60	585.00
09/23/24	Jennifer B. Kimble	Call with RPA Advisors regarding prepetition marketing process.	BK110	0.70	682.50
09/23/24	Todd C. Meyers	Exchange with bond counsel regarding RPA call regarding marketing (.1); Email from Dundon regarding call with DSI (.1); various exchanges regarding same (.2); call with Kramer Levin and RPA (.6); exchange with Dundon regarding data room access (.1).	BK110	1.10	1,578.50
09/24/24	Todd C. Meyers	Review Dundon document request (.1); exchange with Dundon regarding same (.1) email exchanges regarding sale issues (.2).	BK110	0.40	574.00
09/24/24	Jennifer B. Kimble	Review update from Dundon on status of sale process and marketing efforts.	BK110	0.20	195.00
09/25/24	Jennifer B. Kimble	Follow up with T. Meyers regarding: bid procedures issue list.	BK110	0.30	292.50
09/25/24	Todd C. Meyers	Various exchanges with Sameer Alifareg and Dahni Barav-Johnson regarding sale issues list and objection.	BK110	0.30	430.50
09/25/24	Danielle Barav-Johnson	Review case materials to inform bid procedures issues list (.9); analyze bid procedures motion, the stalking horse APA and exhibits related to same (1.1); review TRI objection to bid procedures motion (.2).	BK110	2.20	2,079.00
09/26/24	Jennifer B. Kimble	Review and analyze Dundon sale comps (.3); call and emails with D. Barav-Johnson regarding revisions to sale issue list (.4); review Johnson Matthey and Thermochem Objections to Sale (.7); review UCC sale issue list and calls with T. Meyers regarding same (.6).	BK110	2.00	1,950.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
09/26/24	Todd C. Meyers	Various exchanges and conferences with Dahni Barav-Johnson regarding bid procedures and review and revise issues list (2.5); calls with Matt Dundon and Josh Nahas regarding same (.7).	BK110	3.20	4,592.00
09/26/24	Sameer M. Alifarag	Review of bid procedures motion and committee issue list (1.2); draft objection to motion (4.5); legal research regarding same (1.6).	BK110	7.30	5,986.00
09/26/24	Danielle Barav-Johnson	Analyze Bid Procedures motion, bid procedures, cure notice, sale notice, proposed order granting bid procedures motion, and stalking horse agreement (3.0); draft and revise issues list for same (1.4); meeting with T. Meyers regarding bid procedures issues list (.4); revise same (.4); call with J. Kimble regarding same (.1); email with T. Meyers, J. Kimble regarding edits to same (.2).	BK110	5.50	5,197.50
09/27/24	Sameer M. Alifarag	Further research regarding break-up fees, sale timelines, and viability of same (2.0); work on objection to bidding procedures (4.0).	BK110	6.00	4,920.00
09/27/24	Todd C. Meyers	Review Josh Nahas exchange regarding DSI call.	BK110	0.10	143.50
09/27/24	Jennifer B. Kimble	Emails with S. Alifarag regarding bid procedures objection.	BK110	0.10	97.50
09/28/24	Todd C. Meyers	Exchanges regarding bid objection.	BK110	0.10	143.50
09/28/24	Jennifer B. Kimble	Review and revise Bidding Procedures Objection.	BK110	1.90	1,852.50
09/29/24	Sameer M. Alifarag	Attention to comments to draft bidding procedures objection (.3); further work on same (.2).	BK110	0.50	410.00
09/29/24	Danielle Barav-Johnson	Analyze Debtor schedules and stalking horse purchase agreement with respect to preference actions to be purchased (.3); email with T. Meyers regarding same (.1).	BK110	0.40	378.00
09/29/24	Todd C. Meyers	Email with Jenn Kimble regarding Thermochem bid objection (.1); email exchange with MNAT regarding same (.1); exchange with Dundon regarding email to DSI(.1).	BK110	0.30	430.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
09/30/24	Sameer M. Alifarag	Review of objections to bidding procedures motion (.4); draft summary of same (.6); attention to and review of various turns of Committee objection to bidding procedures (.4); further revisions to same (1.9).	BK110	3.30	2,706.00
09/30/24	Jennifer B. Kimble	Call and emails with MNAT regarding Committee Bid Procedures issues and modifications (1.2); send update to ES team following MNAT call on bid procedures (.1); review proposed revisions to Bid Procedures Objection and emails with T. Meyers and S. Alifarag regarding same (.6).	BK110	1.90	1,852.50
09/30/24	Todd C. Meyers	Dundon email regarding meeting with potential committee banker (.1); exchanges with Dundon regarding sales targets (.2); work on bid procedures objection (1.0); review bid objection by Johnson Mathey (.1); review and revise bid objection (.5).	BK110	1.90	2,726.50
10/01/24	Sameer M. Alifarag	Further work on bidding procedures objection (.7); legal research regarding same (.5); email correspondences with ES team regarding analysis of same (.2).	BK110	1.40	1,148.00
10/01/24	Jennifer B. Kimble	Revise Bid Procedures objection language in response to call from committee member and emails with S. Alifarag re: the same (.4); review asset information and biofuel pricing from Dundon team (.2).	BK110	0.60	585.00
10/01/24	Todd C. Meyers	Conference with Jenn Kimble regarding sale objection (.1); exchange with Jeff Waxman regarding breakup fee (.1); further exchange regarding breakup fee cases (.2); review objection (.3).	BK110	0.70	1,004.50
10/02/24	Sameer M. Alifarag	Review of latest version of bid procedures and DIP objections (.5); further legal research (.4) and work on same (.7); email correspondences with ES team regarding outstanding issues regarding same (.3); email correspondences with local counsel re: filing of same (.1).	BK110	2.00	1,640.00
10/02/24	Jennifer B. Kimble	Review Bid Procedures Order (.6); review revised Bid Procedures Objection and send comments to S. Alifarag (.5); email with Dundon re: sale process updates (.2); final revisions to Bid Procedures Objection prior to filing and send final version to Morris James for filing (.4).	BK110	1.70	1,657.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/02/24	Todd C. Meyers	Review revised bid procedures and exchange with Jenn Kimble regarding same (.4); revise order and email regarding same (.3); additional emails regarding bid procedures (.4); review bid objection and exchange with Jenn Kimble regarding same (.4); Dundon email regarding equipment (.1).	BK110	1.60	2,296.00
10/03/24	Jennifer B. Kimble	Review and analyze First Day Declaration and First Day Hearing Transcript to determine current evidentiary record in support of Stalking Horse and make notes for examination of witnesses (2.8); update from Dundon re: sale process (.2).	BK110	3.00	2,925.00
10/03/24	Todd C. Meyers	Exchange with Matt Dundon regarding sale issues.	BK110	0.20	287.00
10/04/24	Jennifer B. Kimble	Emails with T. Meyers, M. Dundon and J. Waxman re: sales process and bid Procedures hearing preparation (.4); review Dundon update on site visit and send comments to Dundon (.6); calls with T. Meyers re: DSI marketing process and hearing preparations (.3); emails with ES and Dundon teams re: update from Debtor re: sale issues (.3); emails with T. Meyers re: call with C. Miller and next steps (.3); begin preparing for depositions and hearing (.8).	BK110	2.60	2,535.00
10/04/24	Todd C. Meyers	Josh Nahas email regarding sale status (.1); call with Matt Dundon regarding status (.2).	BK110	0.30	430.50
10/05/24	Jennifer B. Kimble	Emails with T. Meyers and M. Dundon re: status of settlement discussions (.3); draft and revise DSI 30(b)(6) notice of deposition (.6); begin drafting J. Nahas Declaration (.6); research re: CRO and begin drafting outline for deposition (.8); call with MNAT and Kramer re: possible settlement and next steps (.7).	BK110	3.00	2,925.00
10/05/24	Todd C. Meyers	Call with Matt Dundon regarding call with broker.	BK110	0.10	143.50
10/07/24	Sameer M. Alifarag	Review of Bidding Procedures reply and other related pleadings.	BK110	0.50	410.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/07/24	Jennifer B. Kimble	Revise Nahas Declaration (.5); emails with J. Nahas re: revised declaration and authority to file (.2); review redline bid procedures order (.3); emails with ES and Dundon teams re: revised Nahas Declaration (.2); draft and revise Witness & Exhibit list for 10/9 hearing (.9); call with Dundon re: settlement proposal and update (.3); review Debtors Reply to Committee Bid Procedures Objection (.3).	BK110	2.70	2,632.50
10/07/24	Todd C. Meyers	Review bid procedures redline.	BK110	0.20	287.00
10/08/24	Todd C. Meyers	Review TRI filing.	BK110	0.10	143.50
10/08/24	Sameer M. Alifarag	Email correspondences with case parties regarding revised bid procedures order and exhibits (.1); review of same against prior versions and committee issue list (.7).	BK110	0.80	656.00
10/08/24	Jennifer B. Kimble	Calls with Debtors re: possible settlement (.4); review and edit revised term sheet and circulate to parties (1.0); emails with T. Meyers and S. Alifarag re: bid procedures order markup (.3).	BK110	1.70	1,657.50
10/09/24	Jennifer B. Kimble	Review and revise Bid Procedures Order and related documents (2.8); emails with Debtors and Bondholders counsel re: revisions to Order (.3); calls and emails with C. Miller and C. Carlisle re: bid procedures dates (.4).	BK110	3.50	3,412.50
10/09/24	Sameer M. Alifarag	Email correspondences with ES team, debtors' counsel and lenders' counsel regarding Bid Procedures negotiations (.1); review of various updated drafts of same (.4).	BK110	0.50	410.00
10/10/24	Jennifer B. Kimble	Review revisions to bid procedures order (.4); review MNAT emails re: proposed changes to bid procedures (.2).	BK110	0.60	585.00
10/10/24	Todd C. Meyers	Exchange with Dundon regarding bid procedures.	BK110	0.10	143.50
10/11/24	Sameer M. Alifarag	Attention to dates and deadlines in final bidding procedures order.	BK110	0.10	82.00
10/11/24	Brooke L. Nitti	Correspondence with title company regarding search (.3); review of Loan Title Policy to determine applicability of Declaration of Covenants, Conditions and Restrictions for Center to property and correspondence with J. Kimble regarding the same.	BK110	0.80	480.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/11/24	Jennifer B. Kimble	Review emails re: sale questions related to Fulcrum Sierra covenants (.3); review land covenants (.5); email with B. Nitti re: covenant (.2).	BK110	1.00	975.00
10/12/24	Jennifer B. Kimble	Review emails from Dundon re: sale process update and LOIs received (.2); review Dundon sale process update (.3); email with T. Meyers re: sale hearing (.1); follow up emails on covenant research for Sierra plant (.3).	BK110	0.90	877.50
10/12/24	Todd C. Meyers	Exchanges with Dundon and Rob Dehney regarding land restrictions.	BK110	0.20	287.00
10/13/24	Todd C. Meyers	Exchanges with Rob Dehney and Kramer Levin regarding status.	BK110	0.20	287.00
10/14/24	Jennifer B. Kimble	Emails with T. Meyers re: real property covenant research (.1); email with S. Alifarag re: bid procedures deadlines (.2); emails with G. Hill (Dundon) and J. Nahas (Dundon) re: LOIs (.2); review and analyze LOIs received by the Debtors (.5); review proposed Cure Notice (.2).	BK110	1.20	1,170.00
10/14/24	Todd C. Meyers	Email regarding cure schedule and review cure notice (.2); emails regarding LOIs and schedule (.2).	BK110	0.40	574.00
10/15/24	Brooke L. Nitti	Collaboration with J. Busillo regarding review of Deed of Trust (.5); collaboration with J. Bussilo and Todd Meyers regarding REA and review of DOT documents (.5); collaboration with J. Busillo regarding comments/necessary revisions to DOT review/summary (.3); revisions to DOT review/summary to incorporate comments from J. Busillo (.5).	BK110	1.80	1,080.00
10/15/24	John J. Busillo	Office conference with B. Nitti on various issues (.2); reviewing exclusive use covenant and related title documents in preparation for call on possible use question (.8); attention to review of certain title exceptions and mortgage-related documentation (1.2); phone call T. Meyers (.3); office conference with B. Nitti (.3); emails to K. Boyle regarding land use question (.3); office conference B. Nitti (.3).	BK110	3.40	3,383.00
10/15/24	Kathleen D. Boyle	Review emails re: questions under restrictions manual and other documents regarding use restrictions on land.	BK110	0.30	289.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/15/24	Jennifer B. Kimble	Call with T. Meyers re: sale issues (.1); email to M. Dundon re: Layer 7 (.1); review Reno restrictions re: land use (.3); emails with Dundon re: sale LOIs (.2); review LOI presentations (.4); review bid procedures issues (.2).	BK110	1.30	1,267.50
10/15/24	Todd C. Meyers	Conference with Jenn Kimble regarding land use issue (.1); various exchanges and call with Kathy Boyle regarding same (.5); review LOIs and exchanges with Dundon regarding same (.2); review revised cured schedule and debtor emails regarding same (.1).	BK110	0.90	1,291.50
10/15/24	Sameer M. Alifarag	Review of Dundon analyses regarding sales updates.	BK110	0.20	164.00
10/16/24	Brooke L. Nitti	Review of deed of trust, loan policy, and survey to ensure that the deed of trust encumbers both property locations in the county (1.0); correspondence with R. Gelfand and J. Kimble regarding site locations encumbered by deed of trust (.3); review of title exception documents and revisions to summary for review by J. Busillo (1.5).	BK110	2.80	1,680.00
10/16/24	Kathleen D. Boyle	Begin review of CCRs and property information and compare to information received from client.	BK110	0.50	482.50
10/16/24	John J. Busillo	Attention to email regarding title exceptions (.3); revising email memo regarding mortgage document and title review (.9).	BK110	1.20	1,194.00
10/17/24	Brooke L. Nitti	Correspondence with title company regarding updated property search order (.2); correspondence regarding further review of loan policy and impact of CCR on property (.3).	BK110	0.50	300.00
10/17/24	Kathleen D. Boyle	Continue review of emails and CCRs and Colocation Covenant and loan title policy with respect to data center use question for Parcels 1 and 3 (2.1); emails with J. Kimble regarding other information needed (.3); review underlying title documents to determine applicability to use restrictions (1.8); prepare analysis for T. Meyers and J. Kimble (1.3).	BK110	5.50	5,307.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/17/24	Jennifer B. Kimble	Emails with S. Lee (Layer 7), T. Meyers and Dundon team re: Reno land use covenants (.3); research re: Switch land use litigation (1.0); review relevant documents and send the same to S. Lee (Layer 7) (1.4); review Nevada real property records and pull requested documents and send to K. Boyle re: land use restrictions (1.5); review Title Policy to verify requested documents (.3); emails with T. Meyers re: land use questions (.2).	BK110	4.70	4,582.50
10/17/24	John J. Busillo	Emails regarding title report update (.2); reviewing CCR email from K. Boyle (.3).	BK110	0.50	497.50
10/17/24	Todd C. Meyers	Exchanges regarding land use restriction issues and calls regarding same.	BK110	0.50	717.50
10/18/24	Jennifer B. Kimble	Review and analyze K. Boyle response on land use restrictions for Sierra site (.4); emails with Dundon and Layer 7 re: land use restriction questions (.2); call with T. Meyers re: covenant update (.1).	BK110	0.70	682.50
10/18/24	Todd C. Meyers	Review Kathy Boyle analysis of land restriction and exchanges regarding same (.2); conference with Jenn Kimble and emails regarding same (.2).	BK110	0.40	574.00
10/18/24	Kathleen D. Boyle	Emails with T. Meyers re: follow-up questions and confirmation of analysis regarding title and colocation.	BK110	0.30	289.50
10/21/24	Sameer M. Alifarag	Email correspondences with ES and Dundon teams regarding inquiry on joint bid.	BK110	0.10	82.00
10/21/24	Jennifer B. Kimble	Call and email with Curtis Miller re: bidder questions (.3); draft and send email to T. Meyers and Dundon team re: sale update and bid questions (.2); review email from C. Miller re: TRI discovery (.1); review TRI discovery (.3).	BK110	0.90	877.50
10/21/24	Todd C. Meyers	Exchange with Jenn Kimble regarding objection deadline (.1); email regarding joint bids (.1); call with Jenn Kimble regarding same (.2); review exchange with Katten regarding Blue Arrow term sheet (.1).	BK110	0.50	717.50
10/22/24	Andrew J. Polansky	Correspond with J. Kimble regarding sale order (.2); draft reservation of rights regarding same (1.5).	BK110	1.70	1,020.00



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/22/24	Jennifer B. Kimble	Emails with C. Miller re: Sale Order and sale updates on sale process (.3); email with S. Lee re: update on sales process and data center outreach (.2); calls and emails with T. Meyers re: sales process updates (.3); emails with MNAT and Katten re: call to discuss prepetition sales process (.2); emails with A. Polansky re: drafting ROR on sale/ Stalking Horse APA (.2); emails with C. Carlisle re: sale order (.1); review APA in preparation for marking up Sale Order (.7).	BK110	2.00	1,950.00
10/22/24	Todd C. Meyers	Exchange with Jenn Kimble regarding need for sale objection (.1); email with debtor regarding order (.1); exchange with Dundon regarding joint bids (.1); exchange with Jenn Kimble regarding topco correspondence with bidder (.1); review Thermochem discovery (.3); various exchanges with debtor regarding joint bids (.3); call with Curtis Miller regarding Thermochem resolution (.4); email exchange with Katten regarding PCL call (.1); review Steve Lee update (.1); exchanges regarding sale order (.1).	BK110	1.70	2,439.50
10/23/24	Jennifer B. Kimble	Review sale update from Layer 7 Capital (.1); review various versions and revisions circulated to Sale Order (.8); call with Katten & MNAT re: update on sale process for parent assets (.6); analyze and revise Sale Order to reflect Committee markup (2.1).	BK110	3.60	3,510.00
10/23/24	Todd C. Meyers	Exchange with Jenn Kimble regarding sale order (.1); review same (.8); review Blue Arrow letter (.1); conference with Jenn Kimble regarding sale order (.2); review Kramer comments to order (.2); call with debtor and Katten regarding topco sale status (.6); review notice of discovery (.1); additional exchanges regarding sale order language (.2).	BK110	2.30	3,300.50
10/24/24	Sameer M. Alifarag	Review proposed asset purchase agreement.	BK110	0.60	492.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/24/24	Jennifer B. Kimble	Continue review and suggest further edits to proposed Sale Order (1.3); calls and emails with T. Meyers re: sale order (.3); various emails and call with C. Carlisle (MNAT) re: revised sale order (.4); review C. Miller emails re: TRI discovery related to parent patents (.2); call with J. Waxman re: sale order question (.1); call with MNAT, Kramer and Latham re: Sale order revisions (.4); follow up emails with MNAT and Kramer re: sale order edits (.5).	BK110	3.20	3,120.00
10/24/24	Todd C. Meyers	Email exchanges with MNAT regarding TRI proposal (.2); exchanges regarding sale order (.2); review various revisions to same (.9); call regarding sale order (.3); review Latham comments to same (.2); exchanges regarding Thermochem proposal (.2).	BK110	2.00	2,870.00
10/25/24	Sameer M. Alifarag	Further review of asset purchase agreement, 2009 water supply agreement and water rules.	BK110	0.70	574.00
10/25/24	Jennifer B. Kimble	Review TRI Sale Objection (.2); review Thermochem Sale Objection (.3); review Abengoa Sale Objection (.3).	BK110	0.80	780.00
10/25/24	Todd C. Meyers	Exchanges with Curtis Miller regarding Thermochem proposal (.3); review objections (.5).	BK110	0.80	1,148.00
10/26/24	Jennifer B. Kimble	Emails with T. Meyers re: sale objections (.2); review sale information re: stalking horse acquired assets (.2).	BK110	0.40	390.00
10/26/24	Todd C. Meyers	Email Jenn Kimble regarding sale objection issues (.1); review Trigid objection (.2); email exchange with Jenn Kimble regarding same (.1).	BK110	0.40	574.00
10/27/24	Sameer M. Alifarag	Review of stalking horse APA and stay relief motion (.3); review of sale objections (.8); draft committee memorandum regarding same (.6).	BK110	1.70	1,394.00
10/27/24	Jennifer B. Kimble	Review sale update from Layer 7 Capital (.1); review Dundon sale report from DSI (.1).	BK110	0.20	195.00
10/27/24	Todd C. Meyers	Exchange with Steve Lee regarding status (.1); review DSI sale report (.1).	BK110	0.20	287.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/28/24	Jennifer B. Kimble	Review emails from J. Altman and C. Miller re: parent sale process (.3); emails with T. Meyers re: sale hearing (.2); review correspondence received from parent lenders re: prepetition sales process (.4); review PCL credit bid (.1); review Debtors' Supplemental Cure Notice (.1).	BK110	1.10	1,072.50
10/28/24	Todd C. Meyers	Curtis Miller email regarding PCL communications (.1); review supplemental notice of assumed contracts (.1); email regarding PCL credit bid (.1).	BK110	0.30	430.50
10/29/24	Sameer M. Alifarag	Review of cure and sale objections.	BK110	0.30	246.00
10/29/24	Jennifer B. Kimble	Emails with J. Altman and D. Barnowski re: parent lender sale-related document production (.3); access and download document production and confirm receipt of all bates stamped documents (.6); emails with T. Meyers and A. Polansky re: review of parent lender documents (.2); emails with Debtors and Bondholders re: call to discuss PCL Credit Bid (.1); review and analyze PCL Credit Bid and comments to the same from Debtors and Bondholders (.4); emails with S. Alifarag re: sale and cure objection tracker (.2); call with Debtors and Bondholders re: PCL credit bid term sheet (.5); update to T. Meyers re: call with Debtors and Bondholders (.2); review PCL prepetition term sheet (.3); review Layer 7 update (.1); review Waste Management Cure Objection (.1).	BK110	3.00	2,925.00
10/29/24	Todd C. Meyers	Exchanges regarding PCL emails with bidder (.1); review credit bid stipulation and email MNAT regarding same (.3); email regarding document production (.1); Curtis Miller email regarding credit bid (.1); Jenn Kimble email regarding summary of call with debtors regarding credit bid and other issues (.1); exchanges with Jenn Kimble regarding above issues (.2).	BK110	0.90	1,291.50
10/30/24	Sameer M. Alifarag	Attention to sale and cure objections (.3); prepare tracker in connection with same (.5).	BK110	0.80	656.00
10/30/24	Jennifer B. Kimble	Email with MNAT re: Stalking Horse APA Schedules (.1); review Stalking Horse APA Schedules (.3); begin reviewing parent lender sale document production (1.8).	BK110	2.20	2,145.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/31/24	Jennifer B. Kimble	Continue review of parent prepetition sale document production (.8); emails with Dundon team re: sale update (.2).	BK110	1.00	975.00
<b>Fees for BK110 - Asset Disposition</b>				<b>132.30</b>	<b>132,085.50</b>
<b>BK130 - Case Administration and Analysis</b>					
09/21/24	Andrew J. Polansky	Draft working group list (.3); review, analyze pleadings (1.2); draft UCC bylaws (1.7).	BK130	3.20	1,920.00
09/21/24	Jennifer B. Kimble	Emails with ES team regarding retention, Bylaws, contact list and first day motion analysis (.5); emails with Debtors' and lenders' counsel setting up introductory calls (.2); emails with Dundon team and T. Meyers regarding retention, strategy and DIP Budget/ sale timeline (.6).	BK130	1.30	1,267.50
09/21/24	Todd C. Meyers	Review first day motions (.8); various calls and emails with team regarding to do list (.6).	BK130	1.40	2,009.00
09/22/24	Todd C. Meyers	Call with Rob Dehney and team regarding case overview (1.1); various calls and exchanges with Jenn Kimble and Sameer Alifarag regarding responses to pleadings (1.2); exchanges with debtor regarding extensions of deadlines (.2).	BK130	2.50	3,587.50
09/22/24	Jennifer B. Kimble	Review and revise draft UCC bylaws (.6); email with Debtors' counsel for interested parties list and follow up correspondence (.2); introduction call with MNAT (1.1); draft Notice of Appearance and emails with T. Meyers regarding local counsel (.3); kick off call with Dundon (.6); analyze First Day Declaration (1.0).	BK130	3.80	3,705.00
09/22/24	Sameer M. Alifarag	Review of first day motions and begin draft of client memorandum regarding same.	BK130	2.00	1,640.00
09/23/24	Sameer M. Alifarag	Further work on client memorandum regarding first day motions (1.0); email correspondences with local counsel regarding notice of appearance and pro hac applications, and review of same (.2).	BK130	1.20	984.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
09/23/24	Jennifer B. Kimble	Emails with ES Team regarding NDA and access to data room (.2); emails with MNAT regarding objection deadlines and insurance policies (.2); revise NDA and send comments to A. Polansky (.6); emails with ES Team regarding Interested Parties list and DE Counsel (.4); draft work stream tracker and emails with ES Team regarding open items and next steps (.3); review Pro Hac Motions for Meyers, Alifarag and Kimble and correspondence with Morris James regarding filing (.2); revise Notice of Appearance and correspondence and call with J. Waxman regarding filing NOA (.2).	BK130	2.10	2,047.50
09/23/24	Todd C. Meyers	Exchange with Eric Monzo regarding local counsel status (.1); exchanges regarding notice of appearance and pro hacs (.1); review revised NDA (.1); review bylaws and exchange with Jenn Kimble regarding same (.3); call with Jeff Waxman regarding various issues (.3); conference with Jenn Kimble regarding same (.2); exchange with Dundon regarding PEO information flow (.1); email with Doug Buckley regarding same (.1); email with MNAT regarding NDA(.1); exchanges with Jenn Kimble regarding status and NDA (.2); review first day transcript (1.0).	BK130	2.60	3,731.00
09/24/24	Todd C. Meyers	Review NDA and email regarding same (.3); email with debtor regarding same (.1); work on first day motion issues (.3); call with Sameer Alifarag regarding same (.4); exchange with Luke Murley regarding bid procedures (.1); exchange with Jeff Waxman regarding continuance (.1)	BK130	1.30	1,865.50
09/24/24	Andrew J. Polansky	Revise working group list and bylaws (.2); correspond with T. Meyers, J. Kimble regarding same (.1).	BK130	0.30	180.00
09/24/24	Jennifer B. Kimble	Review revised Committee duty memo (.2); email with MNAT regarding Committee comments to NDA (.1); review and revise First Day Memo and send comments to S. Alifarag (.9); call with T. Meyers and S. Alifarag regarding First Day Memo (.3); emails with A. Polansky regarding Committee call documents (.1).	BK130	1.60	1,560.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
09/24/24	Sameer M. Alifarag	Email correspondences with Dundon team regarding first day analysis and recommendation, and review of Dundon memo regarding same (.3); call with T. Meyers and J. Kimble regarding first day relief and next steps (.2); email correspondences with J. Kimble regarding objections to and recommendations regarding first day relief, and work on client first day memo to include same (1.2); email correspondences with ES and Dundon teams regarding outstanding document requests (.1); review of same (.1); email correspondences with ES team regarding interim compensation motion, and review of same (.5).	BK130	2.40	1,968.00
09/25/24	Sameer M. Alifarag	Email correspondences with ES team regarding first day motions and proposed final relief (.1); work on memorandum regarding same (.6).	BK130	0.70	574.00
09/25/24	Todd C. Meyers	Exchange with Sameer Alifarag regarding interim compensation motion (.1); exchange with Dundon regarding site visit (.2); review first day motion issues memorandum and exchange with Jenn Kimble regarding same (.6).	BK130	0.90	1,291.50
09/25/24	Andrew J. Polansky	Revise NDA (.2); correspond with J. Kimble regarding same (.1).	BK130	0.30	180.00
09/26/24	Todd C. Meyers	Email regarding NDA (.1); exchange with Jeff Waxman regarding status (.1); revise first day memorandum (.3); emails regarding continuance and review notice of same (.2).	BK130	0.70	1,004.50
09/26/24	Jennifer B. Kimble	Review motions and edit First Day Motion issue list (1.0); email with Morris James regarding: objection extension and hearing continuance (.1); emails with MNAT regarding sale and first day motion issues (.2); emails and calls with T. Meyers and S. Alifarag regarding D&O and other first day motion issues (.4).	BK130	1.70	1,657.50
09/26/24	Sameer M. Alifarag	Email correspondences with ES team and company counsel regarding adjournment of committee deadline and second day hearing (.1); email correspondences with Committee regarding same (.1); draft issue list for first day motions and final relief (.4); email correspondences with J. Kimble regarding revisions to same (.1).	BK130	0.70	574.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
09/27/24	Todd C. Meyers	Review declaration errata (.1); exchanges with Jenn Kimble regarding hearing date changes (.2); teleconference with Curtis Miller regarding various issues (.2)	BK130	0.50	717.50
09/27/24	Sameer M. Alifarag	Further review of interim compensation motion (.2); email correspondences with ES team regarding issues of same (.1).	BK130	0.30	246.00
09/27/24	Devorah Hirsch	Download Reschedule Hearing Notice and save to folder and send to docketing.	BK130	0.10	32.50
09/27/24	Jennifer B. Kimble	Review errata sheet for Smith Declaration.	BK130	0.10	97.50
09/28/24	Todd C. Meyers	Debtor email regarding NDA.	BK130	0.10	143.50
09/29/24	Todd C. Meyers	Exchange with Curtis Miller regarding hearing date (.1); email with team regarding strategy (.1); exchange with Jenn Kimble regarding objection status (.1).	BK130	0.30	430.50
09/30/24	Jennifer B. Kimble	Email with J. Waxman regarding draft objections (.1); calls with T. Meyers regarding Committee call follow up and MNAT response on various bid pro issues (.3); emails with parties regarding 10/9 hearing confirmation (.1); review Fulcrum Sierra schedules regarding power and water contracts and email with T. Meyers regarding same (.2).	BK130	0.70	682.50
09/30/24	Todd C. Meyers	Exchange regarding hearing date (.1); conference with Jenn Kimble regarding various issues (.2).	BK130	0.30	430.50
10/01/24	Todd C. Meyers	Exchanges with Jenn Kimble and Sameer Alifarag regarding first days.	BK130	0.20	287.00
10/01/24	Jennifer B. Kimble	Emails with MNAT re: final orders on utilities, wage and cash management motions (.1); emails with T. Meyers and MNAT re: Committee issues with First Day Motions (.2).	BK130	0.30	292.50
10/01/24	Sameer M. Alifarag	Email correspondences with ES team and Committee regarding draft DIP objection (.1); review of company redlines to final DIP order, bidding procedures order, and first day orders (.6).	BK130	0.70	574.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/02/24	Todd C. Meyers	Exchange with debtor regarding contact with independent contractors (.1); exchange with Matt Dundon regarding status (.1); exchange with Sameer Alifarag regarding interim comp procedures (.1).	BK130	0.30	430.50
10/02/24	Sameer M. Alifarag	Email correspondences with ES team re: issues re: interim compensation procedures (.1); email correspondences with local counsel re: same (.1).	BK130	0.20	164.00
10/02/24	Jennifer B. Kimble	Review and edit proposed Final Orders on Wage, Utility and Cash Management Motions and emails with MNAT re: the same (.9); send MNAT comments on Insurance Motion (.2); emails with Morris James re: filing objections (.2).	BK130	1.30	1,267.50
10/03/24	Todd C. Meyers	Conference with Jenn Kimble regarding various issues.	BK130	0.20	287.00
10/03/24	Sameer M. Alifarag	Email correspondences with Jenn Kimble regarding upcoming hearings and objections deadlines for matters re: same (.1); review of docket regarding same (.1).	BK130	0.20	164.00
10/04/24	Jennifer B. Kimble	Research re: possible basis for Chapter 7 conversion (.5); email with MNAT re: litigation, NDA and Deposition Notice (.3); emails with A. Polansky re: fully executed NDA and Bylaws (.1); review and analyze Dundon presentation on Debtors' schedules and SOFAs (.4).	BK130	1.30	1,267.50
10/04/24	Andrew J. Polansky	Correspond with J. Kimble regarding signed bylaws, NDAs (.3); compile signed documents regarding same (.3).	BK130	0.60	360.00
10/04/24	Todd C. Meyers	Review email regarding site visit and status.	BK130	0.20	287.00
10/05/24	Jennifer B. Kimble	Email with C. Miller re: lift of PEO designation on data room materials.	BK130	0.10	97.50
10/06/24	Jennifer B. Kimble	Emails with ES and Dundon re: committee call agenda (.1); call with Waxman re: deposition prep call (.1); emails with MNAT re: revised final orders on First Day Motions and additional revisions to the same (.3); review revised Final Orders on Cash Management, Insurance, Utilities and Wage Motions (.5).	BK130	1.00	975.00
10/06/24	Todd C. Meyers	Exchange with Sameer Alifarag regarding first day order issues.	BK130	0.10	143.50



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/07/24	Sameer M. Alifarag	Email correspondences with ES team and company counsel re: outstanding issues regarding first day orders (.1); review of same (.3); email correspondences with ES team and Committee regarding settlement updates (.2); Review of DIP Motion reply and other related pleadings (.5).	BK130	1.10	902.00
10/07/24	Todd C. Meyers	Review analysis of statements and schedules.	BK130	0.20	287.00
10/07/24	Andrew J. Polansky	Revise declaration in support of motion to convert.	BK130	0.10	60.00
10/08/24	Sameer M. Alifarag	Attention to correspondence with case parties regarding Josh Nahas and Mark Smith depositions, and productions regarding same (.2); Attention to docket updates regarding October 9 hearing and review of documents regarding same (.5); Email correspondences with ES team and Committee regarding deposition recaps and settlement updates (.2).	BK130	0.90	738.00
10/09/24	Jennifer B. Kimble	Email with MNAT re: fully executed NDA.	BK130	0.10	97.50
10/10/24	Todd C. Meyers	Exchanges with MNAT regarding first day orders.	BK130	0.10	143.50
10/14/24	Todd C. Meyers	Email regarding tomorrows hearing.	BK130	0.10	143.50
10/15/24	Sameer M. Alifarag	Attention to correspondences with company counsel regarding cancellation of 10/15 hearing.	BK130	0.10	82.00
10/21/24	Jennifer B. Kimble	Follow up on resolution of employment application issues and COC (.1); edit and revise Layer 7 Retention Application (1.4); emails with T. Meyers and J. Waxman re: Layer 7 Retention Application (.2).	BK130	1.70	1,657.50
10/23/24	Sameer M. Alifarag	Review and analysis of September 2024 monthly operating reports.	BK130	0.20	164.00
10/24/24	Jennifer B. Kimble	Review Dundon report on Debtors MOR (.1); review S. Alifarag memo re: TRIC motion and follow up correspondence re: the same (.3).	BK130	0.40	390.00
10/24/24	Sameer M. Alifarag	Review and analysis of Tri General Stay Relief Motion (.2); draft summary of same (.3); email correspondences with J. Kimble regarding same (.1).	BK130	0.60	492.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/26/24	Todd C. Meyers	Exchanges regarding parent loan documents.	BK130	0.10	143.50
<b>Fees for BK130 - Case Administration and Analysis</b>				<b>45.50</b>	<b>46,424.50</b>
<b>BK140 - Claims Adm. and Objections</b>					
10/05/24	Jennifer B. Kimble	Call with Todd Meyers re: follow up on call with Bondholders and claims pool - secured, mechanic liens and unsecured debt.	BK140	0.20	195.00
10/15/24	Todd C. Meyers	Review TRIGID notice of lien.	BK140	0.10	143.50
10/21/24	Jennifer B. Kimble	Email with T. Meyers re: creditor inquiry.	BK140	0.10	97.50
<b>Fees for BK140 - Claims Adm. and Objections</b>				<b>0.40</b>	<b>436.00</b>
<b>BK141 - Lien Investigation</b>					
09/24/24	Todd C. Meyers	Email regarding lien review.	BK141	0.10	143.50
09/25/24	Todd C. Meyers	Exchange with Becky Gelfand regarding lien review.	BK141	0.10	143.50
09/30/24	Rebecca A. Gelfand	Review status of diligence documentation and prepare diligence request list.	BK141	1.20	1,230.00
09/30/24	Shawne M. Keenan	Confer with J. Kimble regarding scope of lien searches needed (.5); research jurisdictions for lien searches and prepare summary of proposed lien searches (.6); submit lien search order with instructions (.3).	BK141	1.40	700.00
09/30/24	Todd C. Meyers	Exchanges regarding lien searches.	BK141	0.20	287.00
09/30/24	Jennifer B. Kimble	Emails with S. Keenan regarding ordering UCC search for Fulcrum and Nevada information about facility (.5); emails with B. Gelfand regarding loan documents needed from Bondholders for lien review (.3); draft and send email to Bondholders regarding: document request/ items needed to complete lien review and regarding-download documents to confirm receipt (.5).	BK141	1.30	1,267.50
10/01/24	Rebecca A. Gelfand	Arrange for ordering of charter documents.	BK141	0.30	307.50
10/01/24	Shawne M. Keenan	Submit request for certified formation documents with instructions (.1); follow-up with R. Gelfand regarding Fulcrum BioEnergy charter documents (.2).	BK141	0.30	150.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/01/24	Jennifer B. Kimble	Call with B. Gelfand re: Fulcrum Bioenergy background.	BK141	0.20	195.00
10/02/24	Shawne M. Keenan	Follow-up with service company regarding lien searches (.2); follow-up with R. Gelfand regarding certified copies of charter documents (.2); follow-up with service company regarding reason for entity being in bad standing (.3); provide additional information to R. Gelfand on steps to resolve bad standing issues (.3).	BK141	1.00	500.00
10/02/24	Rebecca A. Gelfand	Begin reviewing existing documentation and analyze issues relating to certified charters.	BK141	1.20	1,230.00
10/04/24	Rebecca A. Gelfand	Obtain bond documents for review.	BK141	1.00	1,025.00
10/07/24	Sameer M. Alifarag	Research re: commenced litigation and mechanic lien assertions.	BK141	0.40	328.00
10/07/24	Todd C. Meyers	Email regarding lien investigation.	BK141	0.10	143.50
10/07/24	Shawne M. Keenan	Follow-up regarding pending orders (.2); forward items received to R. Gelfand (.1).	BK141	0.30	150.00
10/07/24	Rebecca A. Gelfand	Continue reviewing bond documents.	BK141	2.30	2,357.50
10/08/24	Brooke L. Nitti	Collaboration with John Busillo regarding review of mortgages to confirm lien priority.	BK141	0.20	120.00
10/08/24	John J. Busillo	Reviewing email from J. Kimble and property schedule regarding Nevada mortgages (.3); phone call B. Nitti (.3); attention to email regarding documents (.3); reviewing mortgage-related documents (1.1).	BK141	2.00	1,990.00
10/08/24	Rebecca A. Gelfand	Arrange for mortgage review (.5); review lien searches (3.3).	BK141	3.80	3,895.00
10/08/24	Shawne M. Keenan	Review lien search results received and forward lien search reports to R. Gelfand.	BK141	0.30	150.00
10/09/24	Todd C. Meyers	Exchanges regarding loan documents with debtor and Jenn Kimble.	BK141	0.20	287.00
10/09/24	Rebecca A. Gelfand	Continue reviewing bond documents (1.6); follow up on outstanding items (.2).	BK141	1.80	1,845.00
10/09/24	Jennifer B. Kimble	Review email from B. Gelfand and send missing documents list to Bondholders (Kramer) and Debtors (MNAT).	BK141	0.40	390.00

**FEE DETAIL**

<b><u>Date</u></b>	<b><u>Timekeeper</u></b>	<b><u>Narrative</u></b>	<b><u>Task</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
10/09/24	John J. Busillo	Preparing for call with J. Kimble and B. Gelfand regarding questions on mortgage review.	BK141	0.30	298.50
10/10/24	Brooke L. Nitti	Review of documents received by J. Kimble and R. Gelfand regarding mortgage (1.5); confer with J. Busillo regarding preparation for internal call with J. Kimble and R. Gelfand regarding mortgage review (1.0).	BK141	2.50	1,500.00
10/10/24	Rebecca A. Gelfand	Analyze mortgage issues.	BK141	0.50	512.50
10/10/24	Jennifer B. Kimble	Call with J. Busillo and R. Gelfand re: Nevada mortgage review (.5); follow up emails with B. Nitti re: Title policy for Nevada mortgages (.2).	BK141	0.70	682.50
10/10/24	John J. Busillo	Attention to mortgage loan document amendments and borrower lien searches (.8); email from B. Nitti regarding documentation (.3); phone call B. Nitti (.3); phone call J. Kimble, B. Gelfand and B. Nitti regarding transaction (.5); phone call and emails B. Nitti on documentation and title search (.5).	BK141	2.40	2,388.00
10/11/24	John J. Busillo	Attention to emails regarding title review.	BK141	0.30	298.50
10/14/24	John J. Busillo	Attention to emails regarding title review, searches and loan document review.	BK141	0.40	398.00
10/14/24	Brooke L. Nitti	Correspondence regarding ETA and fees for updated title search (.2); review of existing lien searched (.5); review of Deed of Trust, Amendments to Deed of Trust, and Assignment of Deed of Trust for any red flags that would invalidate any document (3.0).	BK141	3.70	2,220.00
10/14/24	Jennifer B. Kimble	Emails with B. Gelfand and B. Nitti re: challenge deadline.	BK141	0.10	97.50
10/15/24	Brooke L. Nitti	Review of DOT, as amended and assigned, as well as lien search and preparation of summary to J. Busillo.	BK141	2.00	1,200.00
10/15/24	Rebecca A. Gelfand	Review bond transaction indexes (1.0); analyze lien issues (1.8); review security documentation (3.0).	BK141	5.80	5,945.00
10/15/24	Todd C. Meyers	Jenn Kimble email regarding missing loan documents (.1); emails regarding lien review (.1).	BK141	0.20	287.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/16/24	Rebecca A. Gelfand	Continue analyzing lien status.	BK141	2.60	2,665.00
10/16/24	Jennifer B. Kimble	Review emails re: NV mortgage recording and work through lien review issues (.6); review updated DIP Order and Budget (.4); email with Dundon Team re: updated budget (.1); review mortgage information (.2); follow up with B. Gelfand re: lien review information and questions (.4).	BK141	1.70	1,657.50
10/17/24	Jennifer B. Kimble	Emails with B. Nitti re: title policy update on NV property (.1); call with B. Gelfand re: lien review and status (.3); email with Debtors re: additional CD/ DACA documents (.2); review information re: insurance assets (.2).	BK141	0.80	780.00
10/17/24	Rebecca A. Gelfand	Analyze collateral issues (3.6); arrange for insurance review (.7).	BK141	4.30	4,407.50
10/18/24	Rebecca A. Gelfand	Research public finance UCCs (.9); begin preparing memo to committee (.3).	BK141	1.20	1,230.00
10/18/24	Jennifer B. Kimble	Emails with B. Gelfand re: lien review and response from Debtors on additional documents requested and next steps (.3); call with T. Meyers re: lien review update (.1).	BK141	0.40	390.00
10/21/24	Jennifer B. Kimble	Email with B. Gelfand re: review of parent lender documents.	BK141	0.10	97.50
10/21/24	Rebecca A. Gelfand	Continue preparing memo to committee.	BK141	5.20	5,330.00
10/21/24	Todd C. Meyers	Exchange with Becky Gelfand regarding collateral review.	BK141	0.10	143.50
10/22/24	Todd C. Meyers	Review lien memo and emails regarding same (.4); exchanges regarding LC perfection (.2).	BK141	0.60	861.00
10/22/24	Jennifer B. Kimble	Review and analyze lien review memo and correspondence from B. Gelfand re: the same (.5); follow up emails with MNAT re: collateral inquiries (.2); follow up emails with B. Gelfand with additional questions re: memo and collateral inquiries (.5); emails with B. Nitti re: Nevada mortgage insert for lien review memo (.3).	BK141	1.50	1,462.50
10/22/24	Rebecca A. Gelfand	Revise collateral memo.	BK141	4.50	4,612.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/22/24	John J. Busillo	Reviewing client memo on lender liens from R. Gelfand (.5); emails regarding same (.3).	BK141	0.80	796.00
10/23/24	Jennifer B. Kimble	Review updated lien memo (.2); multiple emails with B. Nitti and B. Gelfand re: revisions to lien review memo (.3); multiple emails with MNAT and Kramer re: CD information and documents requests for lien review (.3); multiple emails with T. Meyers and B. Gelfand re: CD and LOC information (.3); review Final DIP Order re: consent to extend challenge period (.1).	BK141	1.20	1,170.00
10/23/24	Brooke L. Nitti	Collaboration with J. Busillo regarding revisions to Debt and Lien Table Summary and revisions to the same.	BK141	1.00	600.00
10/23/24	John J. Busillo	Reviewing lien memo and revisions (1.0); phone call B. Nitti regarding same (.4); attention to various emails regarding same (.4).	BK141	1.80	1,791.00
10/23/24	Rebecca A. Gelfand	Revise collateral memo (1.2); review letter of credit documentation (.8).	BK141	2.10	2,152.50
10/23/24	Todd C. Meyers	Email exchanges regarding CD lien issues (.2); various exchanges regarding lien issues (.4).	BK141	0.60	861.00
10/24/24	Eric Fenichel	Advise on certificate of deposit perfection.	BK141	0.20	260.00
10/24/24	Jennifer B. Kimble	Emails with B. Gelfand and T. Meyers re: CDs and LC questions (.3); emails with B. Gelfand and T. Meyers re: parent loan review (.2).	BK141	0.50	487.50
10/24/24	Rebecca A. Gelfand	Analyze perfection issues relating to certificates of deposit (1.9); analyze issues relating to parent guaranty of bonds (1.0).	BK141	2.90	2,972.50
10/24/24	Todd C. Meyers	Emails to debtor regarding CDs (.2); additional exchanges regarding lien memo and CDs (.2).	BK141	0.40	574.00
10/25/24	Todd C. Meyers	Various exchanges with Jenn Kimble and debtors and email Kramer regarding lien issues.	BK141	0.30	430.50
10/25/24	Rebecca A. Gelfand	Review lien searches and parent guaranty documents.	BK141	1.20	1,230.00
10/25/24	Jennifer B. Kimble	Emails with C. Miller re: CD documents, DACA and parent loan closing binders.	BK141	0.20	195.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/26/24	Jennifer B. Kimble	Emails with T. Meyers and Kramer re: further extension of challenge period re: CDs.	BK141	0.20	195.00
10/26/24	Todd C. Meyers	Exchanges with Doug Buckley and team regarding CDs (.4); exchange with Curtis Miller regarding letter of credit (.1).	BK141	0.50	717.50
10/27/24	Jennifer B. Kimble	Emails with T. Meyers re: account assets.	BK141	0.20	195.00
10/28/24	Jennifer B. Kimble	Emails with T. Meyers re: stipulation with prepetition lenders (.1); review information re: DIP collateral (.3).	BK141	0.40	390.00
10/28/24	Rebecca A. Gelfand	Download closing set.	BK141	0.10	102.50
10/28/24	Todd C. Meyers	Exchange with Jenn Kimble regarding stipulation on CD issues.	BK141	0.20	287.00
10/29/24	Jennifer B. Kimble	Review Final DIP Order re: DIP Collateral (.3); email with B. Gelfand re: prepetition bond excluded collateral and analyze response (.2).	BK141	0.50	487.50
10/30/24	Rebecca A. Gelfand	Research bank account information (.6); comment on email to lenders (.3).	BK141	0.90	922.50
10/30/24	Todd C. Meyers	Email exchanges regarding lien challenge issues (.7); exchanges with Kramer Levin and Jenn Kimble regarding extension (.2).	BK141	0.90	1,291.50
10/30/24	Jennifer B. Kimble	Review and analyze emails and CD information and determine issues with DACA (.5); draft and send email to T. Meyers outlining CD information and claims (.3); emails with B. Gelfand re: DACA account and UCC questions (.2); draft and revise email to Debtors and Bondholders laying out CD position (.5); emails and call with T. Meyers re: challenge (.2).	BK141	1.70	1,657.50
10/31/24	Todd C. Meyers	Call with Jenn Kimble and various exchanges with Kramer Levin regarding extension on CD issue.	BK141	0.30	430.50
10/31/24	Jennifer B. Kimble	Follow up email with Kramer and MNAT Teams re: CDs and Challenge (.1); calls with T. Meyers re: Bondholder response (.2); emails with Kramer team re: challenge extension (.2); call with J. Waxman re: extension motion (.1).	BK141	0.60	585.00
<b>Fees for BK141 - Lien Investigation</b>				<b>81.70</b>	<b>79,081.00</b>

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK160 - Fee/Employment Applications</b>					
09/25/24	Jennifer B. Kimble	Work on retention application and emails with T. Meyers regarding same.	BK160	0.60	585.00
09/27/24	Jennifer B. Kimble	Call and email with C. Miller regarding request for alternate hearing date (.1); emails with J. Waxman regarding retention application and timing of filing (.2).	BK160	0.30	292.50
09/27/24	Andrew J. Polansky	Draft retention application.	BK160	0.90	540.00
09/28/24	Andrew J. Polansky	Draft retention application.	BK160	0.90	540.00
09/29/24	Jennifer B. Kimble	Work on retention application disclosures.	BK160	0.50	487.50
09/29/24	Andrew J. Polansky	Revise retention application.	BK160	1.20	720.00
09/29/24	Todd C. Meyers	Review Dundon retention application.	BK160	0.20	287.00
09/30/24	Andrew J. Polansky	Revise retention application (2.1); correspond with J. Kimble regarding same (.2).	BK160	2.30	1,380.00
09/30/24	Jennifer B. Kimble	Email with A. Polansky regarding draft retention application (.1); begin analyzing and drafting necessary disclosures related to parties in interest for retention application (1.2).	BK160	1.30	1,267.50
10/01/24	Andrew J. Polansky	Revise retention application (1.1); correspond with J. Kimble regarding same (.2); review, analyze precedent regarding same (.3).	BK160	1.60	960.00
10/01/24	Jennifer B. Kimble	Revise and edit ES retention application (2.0); emails and calls with T. Meyers and M. Sherrill re: retention application and Meyers Declaration (.3).	BK160	2.30	2,242.50
10/01/24	Todd C. Meyers	Review and revise retention application and email Jenn Kimble regarding same.	BK160	0.70	1,004.50
10/02/24	Todd C. Meyers	Exchange with Jeff Waxman regarding retention applications (.1); revise and edit and email Jenn Kimble regarding same (.3).	BK160	0.40	574.00
10/02/24	Sameer M. Alifarag	Email correspondences with ES and Morris James teams regarding status of retention applications.	BK160	0.10	82.00



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/02/24	Jennifer B. Kimble	Review and edit retention application (1.5); analyze conflict information and draft disclosures for T. Meyers Declaration (1.1).	BK160	2.60	2,535.00
10/02/24	Andrew J. Polansky	Revise Eversheds retention application (.6); correspond with J. Kimble regarding same (.2).	BK160	0.80	480.00
10/03/24	Sameer M. Alifarag	Review of draft Eversheds retention application (.2); email correspondences with Committee and ES team regarding same (.1).	BK160	0.30	246.00
10/03/24	Jennifer B. Kimble	Work on retention application (1.0); revise and edit Eversheds retention application (1.7); call with T. Meyers re: retention application (.2); email and call with J. Waxman re: retention applications and timing of sending to Committee (.1).	BK160	3.00	2,925.00
10/03/24	Todd C. Meyers	Review revised retention applications and exchange with Jenn Kimble.	BK160	0.20	287.00
10/04/24	Todd C. Meyers	Exchanges regarding retention application.	BK160	0.10	143.50
10/04/24	Jennifer B. Kimble	Emails with Committee and J. Waxman re: execution version of employment app and finalize and filing of the same.	BK160	0.20	195.00
10/07/24	Jennifer B. Kimble	Emails with S. Alifarag re: Debtors retention and interim compensation order.	BK160	0.20	195.00
10/10/24	Jennifer B. Kimble	Emails with A. Polansky re: investment banker retention.	BK160	0.20	195.00
10/10/24	Andrew J. Polansky	Review precedent regarding Layer 7 retention application (.7); correspond with Morris James team, J. Kimble regarding same (.2).	BK160	0.90	540.00
10/10/24	Todd C. Meyers	Exchange with Jenn Kimble regarding Layer 7 retention.	BK160	0.10	143.50
10/11/24	Todd C. Meyers	Exchange with Matt Dundon regarding Layer 7 retention.	BK160	0.10	143.50
10/11/24	Jennifer B. Kimble	Email with J. Waxman re: coverage at 10/15 hearing on Debtor retentions (.1); emails with Dundon Team and A. Polansky re: Layer 7 retention (.2).	BK160	0.30	292.50
10/14/24	Jennifer B. Kimble	Emails with S. Alifarag re: retention orders and revisions (.2); call with J. Waxman re: 10/15 hearing (.1).	BK160	0.30	292.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/14/24	Andrew J. Polansky	Draft Layer 7 retention application.	BK160	1.30	780.00
10/14/24	Todd C. Meyers	Sameer Alifarag email regarding revised retention orders.	BK160	0.10	143.50
10/15/24	Jennifer B. Kimble	Review UST comments to Eversheds retention application (.4); work through issues and respond to UST accordingly (.5).	BK160	0.90	877.50
10/15/24	Sameer M. Alifarag	Email correspondences with ES team, local counsel and UST regarding comments to Committee retention applications.	BK160	0.20	164.00
10/15/24	Andrew J. Polansky	Revise Layer 7 retention application.	BK160	0.30	180.00
10/16/24	Todd C. Meyers	Exchanges regarding retention issues raised by UST.	BK160	0.30	430.50
10/16/24	Jennifer B. Kimble	Email with T. Meyers re: UST questions re: retention (.1); gather information from conflicts to respond to UST inquiry (.4); call with conflicts re: ESI disclosures (.3); emails and call with UST re: retention application questions and follow up (.5).	BK160	1.30	1,267.50
10/17/24	Jennifer B. Kimble	Follow up with conflicts on information for supplemental disclosure (.4); begin drafting supplemental Meyers Declaration (.6).	BK160	1.00	975.00
10/18/24	Todd C. Meyers	Exchanges with Jenn Kimble and UST regarding retentions.	BK160	0.20	287.00
10/18/24	Jennifer B. Kimble	Finish drafting and revising Supplemental Meyers Declaration (.4); emails with T. Meyers and Morris James re: Supplemental Declaration and filing the same (.2); calls and emails with R. Sierra-Fox re: Eversheds Supplemental Declaration and resolution of UST issues with retention (.3); call with T. Meyers re: resolution of UST issues and COC (.1).	BK160	1.00	975.00
10/18/24	Sameer M. Alifarag	Review supplemental declaration in support of ES retention application (.1); email correspondences with UCC professionals and US Trustee regarding same (.1).	BK160	0.20	164.00
10/21/24	Todd C. Meyers	Revise Layer 7 application.	BK160	0.20	287.00
10/22/24	Jennifer B. Kimble	Call and email with J. Waxman re: Layer 7 Capital Retention Application.	BK160	0.30	292.50
<b>Fees for BK160 - Fee/Employment Applications</b>				<b>29.90</b>	<b>26,399.50</b>

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK170 - Fee/Employment Objections</b>					
09/24/24	Todd C. Meyers	Review MNAT retention application.	BK170	0.20	287.00
10/03/24	Jennifer B. Kimble	Email with S. Alifarag re: review of Debtors' retention applications (.2); review DSI application and engagement letter (.3); email with S. Alifarag re: objection deadline for Debtor retention applications (.1).	BK170	0.60	585.00
10/03/24	Sameer M. Alifarag	Review of debtors' applications to retain DSI (.4); Verita (.2) and Morris Nichols (.2); prepare committee memorandum regarding same (.7).	BK170	1.50	1,230.00
10/04/24	Sameer M. Alifarag	Call with J. Kimble regarding issues on retention applications (.3); further attention to issues regarding same and work on committee memo regarding same (.7); draft committee issue list re: same (.3).	BK170	1.30	1,066.00
10/04/24	Jennifer B. Kimble	Review and revise Committee memo re: Debtors retention applications (.6); emails and call with S. Alifarag re: comments to memo and next steps (.2); call with S. Alifarag re: revisions to Debtors retention applications memo (.1).	BK170	0.90	877.50
10/04/24	Todd C. Meyers	Exchange with Jenn Kimble regarding DSI retention.	BK170	0.10	143.50
10/05/24	Sameer M. Alifarag	Finalize committee memorandum on retention applications and issue list (.3); email correspondences with ES team regarding same (.1).	BK170	0.40	328.00
10/05/24	Jennifer B. Kimble	Review and revise UCC memo re: Debtor retention applications (.2); email with S. Alifarag re: revisions to Debtor retention memo (.1); multiple emails with S. Alifarag and T. Meyers re: DSI retention application, issues and questions (.2).	BK170	0.50	487.50
10/05/24	Todd C. Meyers	Review retention applications, memo and exchanges with Sameer Alifarag and Jenn Kimble regarding same.	BK170	0.40	574.00
10/06/24	Todd C. Meyers	Review revised memo regarding retention applications and email exchanges with Sameer Alifarag regarding same.	BK170	0.20	287.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/06/24	Sameer M. Alifarag	Email correspondences with J. Kimble and T. Meyers regarding updated retention issue list and memo (.1); email correspondences with MNAT team regarding same (.1).	BK170	0.20	164.00
10/10/24	Sameer M. Alifarag	Email correspondences with debtors' counsel and ES team regarding retention application status (.2); review and analysis of revised orders regarding same as compared to Committee issue list (.4).	BK170	0.60	492.00
10/14/24	Sameer M. Alifarag	Email correspondences with T. Meyers and J. Kimble regarding status of hearing on Debtors' retention applications.	BK170	0.10	82.00
10/30/24	Todd C. Meyers	Brief review of debtor fee statement.	BK170	0.10	143.50
<b>Fees for BK170 - Fee/Employment Objections</b>				<b>7.10</b>	<b>6,747.00</b>

**BK180 - Financing**

09/21/24	Jennifer B. Kimble	Work on DIP Issue List (.6); analyze DIP budget (.5).	BK180	1.10	1,072.50
09/22/24	Todd C. Meyers	Call with Kramer Levin team regarding DIP financing.	BK180	0.40	574.00
09/22/24	Jennifer B. Kimble	Review and analyze DIP Loan Documents (1.8); emails with Debtors' counsel regarding extension of Committee deadline to object to DIP (.1); emails with Kramer regarding bond documents and agreement to keep PEO pending documentation of NDA with Debtors (.2); call with Kramer and follow up correspondence (.4).	BK180	2.50	2,437.50
09/23/24	Jennifer B. Kimble	Continue analyzing DIP documents and Interim DIP Order (2.5); work on DIP Issues List (1.0); emails with T. Meyers regarding Fulcrum Inc. and use of DIP proceeds (.3); emails with Debtors and lenders regarding: DIP Objection deadlines (.2).	BK180	4.00	3,900.00
09/23/24	Todd C. Meyers	Various exchanges regarding DIP objection extension (.2); exchange with Jenn Kimble regarding DIP issues list (.1); further exchanges regarding extension and open issues (.3).	BK180	0.60	861.00
09/24/24	Todd C. Meyers	Work on DIP issues and various emails and conferences with Jenn Kimble and debtor regarding same (.7); review DIP issues list (.2); review DIP Motion and work on same (2.0).	BK180	2.90	4,161.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
09/24/24	Jennifer B. Kimble	Continue analyzing DIP documents and draft DIP Issue List (3.9); emails with T. Meyers regarding DIP Issues List (.3).	BK180	4.20	4,095.00
09/25/24	Sameer M. Alifarag	Email correspondences with ES team regarding DIP issues list (.2); review of same and interim DIP order (.5).	BK180	0.70	574.00
09/25/24	Andrew J. Polansky	Draft objection to DIP (4.1); review, analyze precedent regarding same (1.3).	BK180	5.40	3,240.00
09/25/24	Jennifer B. Kimble	Edit DIP Issue List to address additional comments and issues (1.9); review DIP Note for any additional issues to add to DIP issue list (1.0); emails with Debtors and Lenders regarding DIP Issue List (.2); emails with T. Meyers regarding: DIP Objection (.2); work through DIP Objection issues and begin drafting objection (.5).	BK180	3.80	3,705.00
09/25/24	Todd C. Meyers	Revise DIP issues list (.4); exchanges with J. Kimble regarding same (.2); call with J. Kimble regarding same (.2); review revised list (.1); exchange with J. Kimble regarding DIP objection (.1).	BK180	1.00	1,435.00
09/26/24	Jennifer B. Kimble	Call with MNAT regarding Committee DIP Issue List (1.8); call with Dundon regarding DIP Budget and Milestones (.6); provide mark up of certain DIP Order provisions following call with MNAT (.9); work on DIP Objection (.7); .	BK180	4.10	3,997.50
09/26/24	Todd C. Meyers	Call with MNAT regarding DIP issues and emails with Jenn Kimble regarding same.	BK180	1.80	2,583.00
09/26/24	Andrew J. Polansky	Revise objection regarding DIP motion (1.8); correspond with J. Kimble regarding same (.2).	BK180	2.00	1,200.00
09/26/24	Sameer M. Alifarag	Call with debtors' counsel and ES team regarding DIP issues (1.8); Email correspondences with Dundon team regarding DIP and bidding procedures comparison analyses (.1); review of same (.2).	BK180	2.10	1,722.00
09/27/24	Todd C. Meyers	Review lender fees and emails regarding inclusion of sale work (.3); Conference with Jenn Kimble regarding lender fees (.2).	BK180	0.50	717.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
09/27/24	Jennifer B. Kimble	Review DIP lender bills (.1); work on DIP Objection (3.5); email and call with T. Meyers regarding DIP lender fees (.1); email and call with UST regarding DIP lender fees (.2).	BK180	3.90	3,802.50
09/27/24	Andrew J. Polansky	Revise DIP Objection.	BK180	1.40	840.00
09/28/24	Andrew J. Polansky	Correspond with J. Kimble regarding DIP Objection and work on same.	BK180	0.70	420.00
09/28/24	Jennifer B. Kimble	Continue drafting and revising DIP Objection.	BK180	4.60	4,485.00
09/29/24	Andrew J. Polansky	Correspond with J. Kimble regarding DIP objection (.1); review DIP Objection precedent regarding same (.1).	BK180	0.20	120.00
09/29/24	Sameer M. Alifarag	Email correspondences with ES team regarding draft DIP objection (.1); review of same (.2); email correspondences with Committee professionals regarding proposed settlement terms (.2); draft term sheet in connection with same (.8); email correspondences with ES and Dundon teams regarding potential settlement (.1).	BK180	1.40	1,148.00
09/29/24	Jennifer B. Kimble	Draft and edit DIP Financing Objection (4.4); emails with T. Meyers regarding DIP Objection (.2); emails with A. Polansky regarding execution version of NDA and revisions to form DIP Objection (.2).	BK180	4.80	4,680.00
09/29/24	Todd C. Meyers	Work on settlement term sheet (1.5); call with committee professionals regarding same (.9); revise term sheet (.2).	BK180	2.60	3,731.00
09/30/24	Jennifer B. Kimble	Revise DIP Objection to add administrative insolvency argument (2.3); revise DIP Objection to incorporate various edits and T. Meyers comments (1.6); review and analyze DIP budget variance report (.1); emails with J. Waxman regarding administrative insolvency cases and DE transcripts (.3).	BK180	4.30	4,192.50
09/30/24	Todd C. Meyers	Various exchanges and calls regarding term sheet and revise same (.5); exchange with local counsel regarding Delaware cases for objection (.2); revise objection (1.7); exchange with Jenn Kimble regarding same (.1); exchange with Jenn Kimble regarding review of loan documents and budget (.2).	BK180	2.70	3,874.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
09/30/24	Devorah Hirsch	Prepare excerpt of transcript to be attached as exhibit to DIP objection.	BK180	0.50	162.50
09/30/24	Sameer M. Alifarag	Email correspondences with ES team regarding term sheet (.2); further work on same (1.5); attention to and review of various turns of comments to Committee DIP objection (.2); email correspondences with ES team regarding same (.2).	BK180	2.10	1,722.00
09/30/24	Jennifer B. Kimble	Review draft UCC settlement Term Sheet.	BK180	0.20	195.00
10/01/24	Todd C. Meyers	Work on term sheet (1.5); review Jenn Kimble's changes to same (.1); call with Jenn Kimble regarding objection status (.1).	BK180	1.70	2,439.50
10/01/24	Todd C. Meyers	Josh Nahas email regarding objection (.1); review revised dip order and exchanges regarding same (.6); revise DIP objection (1.0); review Jeff Waxman comments to same (.2); revise term sheet (.4); exchange with Jeff Waxman (.1); exchanges with Dundon regarding settlement (.2).	BK180	2.60	3,731.00
10/01/24	Jennifer B. Kimble	Revise and edit draft term sheet and emails with UCC professionals re: the same (.4); multiple rounds of reviewing and editing DIP Objection to incorporate comments from counsel and committee members (4.2); email with B. Gelfand re: parent prepetition loan documents (.1); emails with MNAT re: final DIP financing order (.2); edit proposed Final DIP Order (2.3); Call with J. Waxman re: Final DIP Order (.2).	BK180	7.40	7,215.00
10/01/24	Sameer M. Alifarag	Review of initial comments to Committee draft term sheet (.1); call with T. Meyers regarding Committee term sheet revisions (.4); further work on same (.5); email correspondences with local counsel and Dundon team regarding same (.2); email correspondences with ES team and company counsel regarding revised final DIP order (.2); review of and analysis to same (.4).	BK180	1.80	1,476.00
10/02/24	Sameer M. Alifarag	Email correspondences with company counsel, lender counsel and ES team regarding proposed committee term sheet (.1); attention to updated form of term sheet (.1).	BK180	0.20	164.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/02/24	Jennifer B. Kimble	Revisions to DIP Objection to address T. Meyers comments (1.5); final review of DIP Objection and send to Morris James for filing (.5); emails with J. Waxman re: DIP Objection exhibits (.2); emails with A. Polansky re: DIP Objection cite check questions (.2); emails with Debtors and Lenders re: settlement term sheet (.2); emails and call with MNAT re: committee settlement proposal (.7).	BK180	3.30	3,217.50
10/02/24	Todd C. Meyers	Work on DIP objection and various calls and exchanges regarding same (1.3); work on settlement and calls regarding same (1.0); exchange regarding hearing witnesses (.1).	BK180	2.40	3,444.00
10/02/24	Andrew J. Polansky	Review, revise DIP objection for filing (3.1); correspond with J. Kimble regarding same (.2).	BK180	3.30	1,980.00
10/03/24	Sameer M. Alifarag	Email correspondences with ES and Latham teams regarding request for approval of DIP fees and expenses.	BK180	0.10	82.00
10/03/24	Todd C. Meyers	Exchange with Jeff Waxman regarding administrative insolvency argument (.1); conference with Jenn Kimble regarding discovery (.1); exchange with debtor regarding settlement (.1); exchange with Matt Dundon regarding strategy (.3).	BK180	0.60	861.00
10/03/24	Jennifer B. Kimble	Email with T. Meyers re: discovery related to DIP (.2); email with MNAT re: settlement response and evidence in support of final DIP. (.2); review emails re: Debtors revised DIP Budget (.2).	BK180	0.60	585.00
10/04/24	Todd C. Meyers	Call with Jenn Kimble regarding depositions (.4); exchanges with Jenn Kimble and MNAT regarding various issues (.2); call with Curtis Miller regarding hearing evidence (.3); further email exchanges regarding depositions (.2).	BK180	1.10	1,578.50
10/04/24	Jennifer B. Kimble	Draft CRO Notice of Deposition and send to J. Waxman for filing.	BK180	0.60	585.00
10/05/24	Jennifer B. Kimble	Call with J. Waxman re: DSI deposition.	BK180	0.40	390.00



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/05/24	Todd C. Meyers	Exchanges regarding depositions (.2); call with Matt Dundon regarding status (.1); review deposition notice (.1); exchange with Jeff Waxman regarding depositions (.1); review revised declaration (.2); exchange with Josh Nahas regarding same (.1); call with Josh Nahas regarding same (.1); call with Kramer and MNAT regarding settlement (.5); call with Jenn Kimble regarding same (.3).	BK180	1.70	2,439.50
10/06/24	Jennifer B. Kimble	Emails with Debtor re: deposition scheduling on 10/8 (.2); review and analyze revised Budget (.3); emails with T. Meyers re: revised Approved Budget (.2).	BK180	0.70	682.50
10/06/24	Sameer M. Alifarag	Email correspondences with ES and Dundon teams regarding declaration in support of DIP and Bid Procedures objection (.1); review of same (.2).	BK180	0.30	246.00
10/06/24	Jennifer B. Kimble	Work on deposition outline for Mark Smith (2.7); work on DSI Deposition outline (.6); email exchanges with MNAT re: CRO availability for deposition (.2).	BK180	3.50	3,412.50
10/06/24	Todd C. Meyers	Call with Dundon (.4); exchanges regarding discovery (.2); review updated budget (.1) conference with Jenn Kimble regarding depositions (.1); email Sameer Alifarag regarding researching mechanics lien litigation (.1); revise Nahas declaration (.5).	BK180	1.40	2,009.00
10/06/24	Danielle Barav-Johnson	Email with T. Meyers regarding markup of DIP order.	BK180	0.10	94.50
10/07/24	Todd C. Meyers	Work on dip order (1.0); exchange with Josh Nahas regarding budget (.2); further exchanges with Josh Nahas regarding budget (.2); email with MNAT regarding settlement (.1); call with Amy Caton regarding same (.4); call with Matt Dundon regarding settlement strategy (.4); exchanges with de witness list and review same (.2); review motion in limine (.2); emails regarding dip order (.3); call with Kramer regarding settlement (.3); review replies and various additional calls regarding settlement (1.5).	BK180	4.80	6,888.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/07/24	Jennifer B. Kimble	Emails with MNAT and lenders re: deposition scheduling (.3); work on exhibits for Smith Deposition (1.0); call with J. Waxman re: deposition preparations (.4); work on CRO deposition outline (3.9); Work on DSI deposition outline (.6); review and revise Motion in Limine re: Debtors witnesses (.3); review filed redline DIP order and mark up for Committee settlement (.8); emails and call with B. Gelfand re: bondholder lien review, issues and timing (.3); emails with Kramer re: missing documents for lien review (.3); emails with T. Meyers re: DIP Order mark up (.2); calls with Kramer re: possible settlement (.4); review and mark up DIP Order to reflect additional agreements (.5); review Debtors Reply to Committee DIP Objection (.3).	BK180	9.30	9,067.50
10/08/24	Jennifer B. Kimble	Emails with Morris James re: binders and trial document preparations (.3); emails with parties and court reporter re: Mark Smith Deposition Exhibits (.2); emails with MNAT re: deposition exhibits. (.3); review documents and prepare for Deposition of Mark Smith (2.4); take deposition of Mark Smith (2.4); review deposition transcripts and prepare for contested hearing (1.1); attend deposition of Steve Victor (DSI) (2.0); draft Revised Witness and Exhibit List to include Hahas documents and send to Morris James for filing (.8); emails with Morris James to finalize Motion in Limine (.3); work through issues related to confidentiality of various exhibits (.4); revise Motion in Limine exhibit (.1); emails with Dundon team and ES team re: highlights from depositions and transcripts (.4).	BK180	11.30	11,017.50
10/08/24	Jennifer B. Kimble	Multiple calls with T. Meyers re: settlement issues and revisions to order (.5); calls and emails with C. Carlisle re: revised DIP Order and necessary revisions (.3).	BK180	0.80	780.00
10/08/24	Todd C. Meyers	Defend Josh Nahas deposition (2.0); various exchanges and calls regarding settlement, depositions, discovery issues, filings related to tomorrow's hearing and prepare for same (7.8).	BK180	9.80	14,063.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/09/24	Sameer M. Alifarag	Email correspondences with ES team, debtors' counsel and lenders' counsel regarding DIP negotiations (.2); review of various updated drafts of same (.4); review of term sheet in connection with tentative settlement (.2).	BK180	0.80	656.00
10/09/24	Jennifer B. Kimble	Prepare for Hearing on Objections to Bid Procedures and DIP Motion (2.3); attend 10/9 hearing on Bid Procedures and DIP Motion (1.4); meeting at MNAT with case parties to finalize settlement and proposed Final DIP Order and Sale Order (2.8).	BK180	6.50	6,337.50
10/09/24	Todd C. Meyers	Prepare for hearing and various meetings regarding settlement of all issues (7.0); attend hearing (1.3); meeting at MNAT to finalize settlement (2.0).	BK180	10.30	14,780.50
10/10/24	Todd C. Meyers	Review email and revised order.	BK180	0.10	143.50
10/10/24	Jennifer B. Kimble	Review docketed DIP Order and emails with T. Meyers re: same.	BK180	0.10	97.50
10/11/24	Sameer M. Alifarag	Review dates and deadlines in final DIP order.	BK180	0.10	82.00
10/11/24	Jennifer B. Kimble	Calculate challenge period and email with T. Meyers re: the same.	BK180	0.10	97.50
10/12/24	Jennifer B. Kimble	Email with C. Miller re: revised DIP Budget.	BK180	0.10	97.50
10/12/24	Todd C. Meyers	Exchange regarding incorrect budget attachment to DIP order.	BK180	0.10	143.50
10/15/24	Jennifer B. Kimble	Review and analyze weekly Variance Report (.1); review updated DIP Order and revised budget (.3).	BK180	0.40	390.00
10/16/24	Sameer M. Alifarag	Email correspondences with ES and Dundon teams regarding updated DIP budget (.1); review of same (.1).	BK180	0.20	164.00

**Fees for BK180 - Financing      155.10      167,086.50**

**BK190 - Litigation General**

10/03/24	Andrew J. Polansky	Draft motion to convert cases to chapter 7 (2.2); correspond with J. Kimble regarding same (.3).	BK190	2.50	1,500.00
10/04/24	Andrew J. Polansky	Draft motion to convert case (2.3); review, analyze precedent regarding same (.8).	BK190	3.10	1,860.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>Fees for BK190 - Litigation General</b>				<b>5.60</b>	<b>3,360.00</b>
<b>BK200 - Meetings of Creditors</b>					
09/21/24	Todd C. Meyers	Committee call and FA interviews (1.4); brief review of FA pitch books (.3).	BK200	1.70	2,439.50
09/21/24	Jennifer B. Kimble	Committee call and FA interviews (1.4); review of FA pitch books (.3); emails with Committee regarding committee business, scheduling calls and local DE counsel (.3).	BK200	2.00	1,950.00
09/22/24	Todd C. Meyers	Email with committee regarding local counsel (.1); exchanges with Luke Murley and Eric Monzo regarding same (.2).	BK200	0.30	430.50
09/23/24	Jennifer B. Kimble	Review and revise Committee fiduciary duty memo (.3); revise Committee bylaws and send revisions to A. Polansky (.4); review and revise agenda for 9/24 Committee call and emails with T. Meyers regarding same (.3).	BK200	1.00	975.00
09/23/24	Andrew J. Polansky	Draft committee bylaws (1.1); correspond with J. Kimble, T. Meyers regarding same (.2); revise committee bylaws (.4); draft memorandum regarding committee fiduciary duties (.5); correspond with J. Kimble, T. Meyers regarding same (.1); revise memorandum regarding same (.3); correspond with J. Kimble regarding same (.1); comment on NDA (1.3); correspond with J. Kimble, T. Meyers regarding same (.1).	BK200	4.10	2,460.00
09/23/24	Sameer M. Alifarag	Draft committee meeting agenda.	BK200	0.20	164.00
09/23/24	Todd C. Meyers	Review agenda for committee call and exchange with Jenn Kimble regarding same.	BK200	0.20	287.00
09/24/24	Todd C. Meyers	Review revised bylaws (.1); revise and edit duty memo and email regarding same (.3); exchanges with Jenn Kimble regarding meeting preparation (.3); prepare for committee call (.3); committee call (1.2); email committee regarding follow up (.1); exchange with committee member regarding objection deadline and extensions (.2).	BK200	2.50	3,587.50
09/24/24	Sameer M. Alifarag	Attend Committee meeting (1.2); email correspondences with J. Kimble regarding meeting minutes, and drafted same (.4).	BK200	1.60	1,312.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
09/24/24	Andrew J. Polansky	Conference with ES and Morris James teams, Dundon, Committee regarding priority workstreams, next steps.	BK200	0.30	180.00
09/24/24	Jennifer B. Kimble	Review revised Bylaws and email with A. Polansky regarding: additional changes (.2); revise Committee call agenda (.1); draft email and circulate committee materials to Committee (.1); call with T. Meyers and prepare for Committee call (.3); attend UCC call (1.2).	BK200	1.90	1,852.50
09/25/24	Jennifer B. Kimble	Emails with A. Polansky regarding revised bylaws (.1); review and edit Committee First Day Motion Memo and send comments to S. Alifarag (.6); draft and send email to Committee regarding DIP Issue List, First Day Memo, and other Committee business (.3); review and respond to email from A. Donohue-Babiak regarding bylaws and NDA and comments thereto (.2); review and edit minutes from 9/24 Committee call and send revisions to S. Alifarag (.1).	BK200	1.30	1,267.50
09/25/24	Todd C. Meyers	Exchange with committee member regarding bylaw comments.	BK200	0.10	143.50
09/25/24	Andrew J. Polansky	Revise bylaws.	BK200	0.40	240.00
09/26/24	Jennifer B. Kimble	Emails with committee regarding sale issue list, First Day motion issues and time for committee call (.5); emails with A. Polansky regarding NDA revisions and email to MNAT regarding same (.2).	BK200	0.70	682.50
09/26/24	Todd C. Meyers	Committee emails.	BK200	0.30	430.50
09/26/24	Andrew J. Polansky	Finalize bylaws (.2); revise NDA (.2); correspond with MNAT, J. Kimble regarding same (.1).	BK200	0.50	300.00
09/27/24	Jennifer B. Kimble	Emails with Committee regarding scheduling Committee Calls.	BK200	0.10	97.50
09/27/24	Todd C. Meyers	Exchange with Jenn Kimble regarding committee call.	BK200	0.10	143.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
09/29/24	Jennifer B. Kimble	Draft and edit agenda for 9/30 Committee call (.2); emails with Committee professionals regarding draft agenda and materials for UCC call (.2); UCC professionals call to prepare for 9/30 UCC call (1.1); draft and send email to Committee with materials for 9/30 call (.1).	BK200	1.60	1,560.00
09/29/24	Sameer M. Alifarag	Email correspondences with ES and Dundon team regarding proposed agenda, and updates regarding same (.1); attention to documents in connection with same (.1).	BK200	0.20	164.00
09/29/24	Todd C. Meyers	Exchange with Jenn Kimble regarding committee meeting (.1); exchange with Dundon regarding same (.1); review updated agenda (.1); email to committee (.1).	BK200	0.40	574.00
09/29/24	Sameer M. Alifarag	Review of September 30 committee meeting agenda and revisions to same.	BK200	0.10	82.00
09/30/24	Jennifer B. Kimble	Prepare for Committee call (.4); attend UCC call (1.2).	BK200	1.60	1,560.00
09/30/24	Todd C. Meyers	Committee call (1.2); prepare for same (.4); post call conference with Jenn Kimble regarding same (.1).	BK200	1.70	2,439.50
09/30/24	Sameer M. Alifarag	Attend Committee call.	BK200	1.20	984.00
10/01/24	Andrew J. Polansky	Correspond with Committee members regarding signing bylaws, NDA (.2); correspond with J. Kimble regarding same (.1).	BK200	0.30	180.00
10/01/24	Sameer M. Alifarag	Draft September 30 committee meeting minutes and email correspondences with J. Kimble regarding same.	BK200	0.30	246.00
10/01/24	Jennifer B. Kimble	Draft and send email to Committee with proposed objections to DIP and Bid Procedures (.3); call with Committee member re: draft bid procedures objection and revisions (.2).	BK200	0.50	487.50
10/01/24	Todd C. Meyers	Various exchanges with Josh Nahas and committee regarding plant operational issues (.3); email committee regarding first day orders (.1).	BK200	0.40	574.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/02/24	Todd C. Meyers	Email team regarding committee call (.1); Dundon email regarding same (.1); email to committee regarding status (.1); email Jenn Kimble regarding bylaws (.1); call with committee member regarding restarting plant vs. data center operator (.5).	BK200	0.90	1,291.50
10/02/24	Jennifer B. Kimble	Call with Johnson Matthey re: case update and background (.9); emails with committee members re: revised objections and settlement term sheet (.4).	BK200	1.30	1,267.50
10/03/24	Todd C. Meyers	Exchange with committee member regarding status.	BK200	0.10	143.50
10/03/24	Jennifer B. Kimble	Draft and send email to Committee with Dundon and Eversheds retention applications (.1); email and call to Nancy Gates/ General Mills Electro re: participation on the Committee (.1); call to J. Weiss/Linde re: Bylaws and NDA (.1).	BK200	0.30	292.50
10/04/24	Jennifer B. Kimble	Emails with Committee re: retention applications, Dundon site visit update and next call.	BK200	0.20	195.00
10/04/24	Todd C. Meyers	Exchange with Jenn Kimble regarding committee meeting (.1); review email to committee regarding status and revise same (.2).	BK200	0.30	430.50
10/05/24	Jennifer B. Kimble	Begin drafting agenda for Monday UCC call (.2); emails with N. Gates (Washington Mills) re: committee, NDA, Bylaws and scheduling pre-call re: Committee matters (.2).	BK200	0.40	390.00
10/05/24	Todd C. Meyers	Exchange with Jenn Kimble regarding Washington Mills update.	BK200	0.10	143.50
10/06/24	Jennifer B. Kimble	Draft and revise agenda for 10/7 Committee call.	BK200	0.20	195.00
10/06/24	Todd C. Meyers	Exchange with Jenn Kimble regarding committee call agenda.	BK200	0.10	143.50
10/07/24	Sameer M. Alifarag	Email correspondences with ES team, Dundon team and Committee regarding meeting agenda and related items (.1); review of documents regarding same (.3); committee call (1.0).	BK200	1.40	1,148.00
10/07/24	Todd C. Meyers	Committee call (1.0); prepare for same (.3); exchanges with committee regarding possible settlement (.2).	BK200	1.50	2,152.50

**FEE DETAIL**

<b><u>Date</u></b>	<b><u>Timekeeper</u></b>	<b><u>Narrative</u></b>	<b><u>Task</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
10/07/24	Jennifer B. Kimble	Call with N. Gates (Washington Mills) re: Committee role, update and fiduciary duties (.6); draft and send email to Committee with call materials for 10/7 Committee call (.2); committee call (1.0); call with Aquatech re: Committee call and settlement proposal (.3).	BK200	2.10	2,047.50
10/09/24	Jennifer B. Kimble	Draft and send update to Committee re: settlement term sheet, proposed orders, and sale timeline.	BK200	0.60	585.00
10/09/24	Sameer M. Alifarag	Email correspondences with Committee regarding settlement and October 9 hearing updates.	BK200	0.20	164.00
10/10/24	Jennifer B. Kimble	Emails with Committee Members re: weekly standing call.	BK200	0.20	195.00
10/10/24	Todd C. Meyers	Review agenda for meeting.	BK200	0.10	143.50
10/11/24	Sameer M. Alifarag	Email correspondences with Committee regarding status of interested bidders.	BK200	0.10	82.00
10/11/24	Todd C. Meyers	Exchange with member regarding status.	BK200	0.10	143.50
10/11/24	Jennifer B. Kimble	Review notes and gather documents for next committee call (.1); email with Linde re: standing committee call (.1); email with Committee member re: sale process update (.1).	BK200	0.30	292.50
10/12/24	Todd C. Meyers	Exchange with Josh Nahas regarding committee update and review same.	BK200	0.20	287.00
10/14/24	Jennifer B. Kimble	Email with Linde re: weekly committee call (.1); draft Agenda for 10/16 Committee call (.2).	BK200	0.30	292.50
10/15/24	Jennifer B. Kimble	Emails with Morris James re: 341 meeting (.1); revise 10/16 meeting agenda (.1); draft and send email to Committee with 10/16 meeting materials (.1).	BK200	0.30	292.50
10/15/24	Sameer M. Alifarag	Email correspondences with Committee professionals and Committee regarding agenda items for October 16 committee call (.1).	BK200	0.10	82.00
10/15/24	Todd C. Meyers	Email regarding 341 meeting (.1); review call agenda and exchange with Jenn Kimble regarding same (.1).	BK200	0.20	287.00



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/16/24	Jennifer B. Kimble	Review notes from 341 meeting (.2); prepare for weekly Committee call (.2); weekly committee call (.7).	BK200	1.10	1,072.50
10/16/24	Sameer M. Alifarag	Committee call (.7); internal ES correspondences regarding updates in connection with Section 341 meeting (.1).	BK200	0.80	656.00
10/16/24	Todd C. Meyers	Committee call (.7); prepare for same (.2); review Morris James notes from 341 meeting (.1).	BK200	1.00	1,435.00
10/22/24	Sameer M. Alifarag	Draft October 16, 2024 Committee Meeting Minutes (.3); email correspondences with J. Kimble regarding same (.1); email correspondences with Committee regarding cancellation of October 23 meeting (.1).	BK200	0.50	410.00
10/22/24	Jennifer B. Kimble	Emails with Dundon team re: weekly call agenda (.1); email with S. Alifarag re: drafting agenda and items (.1); emails with T. Meyers re: weekly call agenda and update (.1); begin drafting UCC email update (.3).	BK200	0.60	585.00
10/22/24	Todd C. Meyers	Exchange with Jenn Kimble regarding committee meeting (.1); committee email regarding same (.1).	BK200	0.20	287.00
10/23/24	Jennifer B. Kimble	Finish drafting and send email to Committee with weekly update.	BK200	0.20	195.00
10/23/24	Todd C. Meyers	Committee update.	BK200	0.10	143.50
10/24/24	Sameer M. Alifarag	Email correspondences with Committee professionals and Committee regarding case updates and lien review (.1); review documents in connection with same (.2).	BK200	0.30	246.00
10/24/24	Todd C. Meyers	Review Dundon MOR analysis for committee call.	BK200	0.10	143.50
10/25/24	Jennifer B. Kimble	Email with S. Alifarag re: summarizing Sale Objections for Committee.	BK200	0.10	97.50
10/28/24	Todd C. Meyers	Review memos to committee regarding sale objections.	BK200	0.20	287.00
10/28/24	Jennifer B. Kimble	Review and revise committee memo re: sale objections (.6) emails with S. Alifarag re: the same (.2); draft agenda for weekly Committee call (.2).	BK200	1.00	975.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/29/24	Sameer M. Alifarag	Email correspondences with ES, Dundon and Layer 7 teams regarding October 30 committee agenda (.1); attention to documents regarding same (.3).	BK200	0.40	328.00
10/29/24	Jennifer B. Kimble	Emails with Dundon and Layer 7 teams re: materials for weekly call update (.1); update Committee call agenda (.1); draft and send email to Committee with weekly call materials (.1).	BK200	0.30	292.50
10/29/24	Todd C. Meyers	Review agenda for committee call (.1); committee email (.1).	BK200	0.20	287.00
10/30/24	Sameer M. Alifarag	Email correspondences with ES and Johnson Mathey teams regarding status as potential bidder and screening of Committee calls (.1); attend committee call (.7).	BK200	0.80	656.00
10/30/24	Todd C. Meyers	Prepare for committee call (.2); review materials for committee call (.1); committee call (.7); exchange with Luke Murley regarding recusal issues (.1).	BK200	1.10	1,578.50
10/30/24	Jennifer B. Kimble	Email with T. Meyers re: weekly committee call agenda (.1); prepare for Committee call (.3); email with Committee member re: weekly call (.1); weekly committee call (.7).	BK200	1.20	1,170.00
<b>Fees for BK200 - Meetings of Creditors</b>				<b>49.40</b>	<b>51,326.00</b>

**BK220 - Relief from Stay Proceedings**

10/15/24	Jennifer B. Kimble	Review and Analyze TRI Notice of Lien and Motion for Relief from Stay.	BK220	1.00	975.00
10/26/24	Jennifer B. Kimble	Email with T. Meyers re: covering TRI General Improvement District Stay Relief Hearing on 11/5.	BK220	0.10	97.50
10/27/24	Sameer M. Alifarag	Finalize stay relief committee memorandum.	BK220	0.20	164.00
10/28/24	Sameer M. Alifarag	Call with J. Kimble regarding stay relief and sale implications (.2); finalize internal memoranda regarding same (.2); email correspondences with T. Meyers and J. Kimble regarding same (.1).	BK220	0.50	410.00
10/28/24	Jennifer B. Kimble	Review and revise TRIGID Stay Relief Motion memo; (.3) call and email with S. Alifarag re: same (.2).	BK220	0.50	487.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/29/24	Jennifer B. Kimble	Review Debtors' Response to TRIGID Relief from Stay Motion (.3); review UMB joinder in Debtors' Response to TRIGID Stay Relief Motion (.2).	BK220	0.50	487.50
<b>Fees for BK220 - Relief from Stay Proceedings</b>				<b>2.80</b>	<b>2,621.50</b>
<b>BK310 - Travel Time</b>					
10/08/24	Todd C. Meyers	Travel to Delaware (billed at half rate).	BK310	3.00	2,152.50
10/09/24	Todd C. Meyers	Travel to Atlanta (billed at half rate).	BK310	3.00	2,152.50
10/09/24	Jennifer B. Kimble	Travel to Delaware (billed at half rate).	BK310	2.80	1,365.00
<b>Fees for BK310 - Travel Time</b>				<b>8.80</b>	<b>5,670.00</b>
<b>BK900 - Insurance</b>					
09/23/24	Sameer M. Alifarag	Email correspondences with company counsel regarding request for D&O policies and details of same.	BK900	0.10	82.00
09/24/24	Todd C. Meyers	Brief review of insurance policies and emails regarding same.	BK900	0.40	574.00
09/25/24	Todd C. Meyers	Email exchanges with Lynn Holbert regarding D&O policy review.	BK900	0.20	287.00
09/26/24	Todd C. Meyers	Exchange regarding insurance policy review.	BK900	0.10	143.50
09/26/24	David A. Wender	Review and analyze Fulcrum D&O policies.	BK900	0.70	770.00
09/26/24	Lynn W. Holbert	Review and consider summary of D&O claim period issue sent by T. Meyers (.3); review and consider policies and policy terms in conjunction with extensions and endorsements (1.7); draft summary of impact of extensions on time for reporting claims (.7); email to T. Meyers and J. Kimble regarding same (.1).	BK900	2.80	3,220.00
09/27/24	Lynn W. Holbert	Email summary to T. Meyers regarding extension of policy period per Run off endorsement (.5); review T. Meyers's questions related to past claims reporting and policy term per run off endorsement (.2); review and consider policies and revert (.3).	BK900	1.00	1,150.00
09/27/24	Todd C. Meyers	Review D&O analysis and exchanges regarding same.	BK900	0.30	430.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
10/01/24	Lynn W. Holbert	Discuss policy terms with J. Pruitt (.5); review and consider coverage limits and policy qualifications (1.2); revert to T. Meyers with summary of coverage tower (.5).	BK900	2.20	2,530.00
10/02/24	Todd C. Meyers	Exchange with Lynn Holbert regarding D&O analysis.	BK900	0.10	143.50
10/03/24	Lynn W. Holbert	Review and consider T. Meyer's additional questions regarding insured v insured exclusion and side A claims (.2); research impact of shared limits on side A proceeds as property of the estate (.7); revert to T. Meyers questions (.4).	BK900	1.30	1,495.00
<b>Fees for BK900 - Insurance</b>				<b>9.20</b>	<b>10,825.50</b>
Total Hours/Fees				527.80	\$532,063.00

**SUMMARY OF LEGAL SERVICES**

<b>TIMEKEEPER</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Kathleen D. Boyle	6.60	965.00	6,369.00
John J. Busillo	13.10	995.00	13,034.50
Todd C. Meyers	6.00	717.50	4,305.00
Todd C. Meyers	107.40	1,435.00	154,119.00
David A. Wender	0.70	1,100.00	770.00
Eric Fenichel	0.20	1,300.00	260.00
Jennifer B. Kimble	2.80	487.50	1,365.00
Jennifer B. Kimble	210.60	975.00	205,335.00
Danielle Barav-Johnson	8.20	945.00	7,749.00
Rebecca A. Gelfand	42.90	1,025.00	43,972.50
Lynn W. Holbert	7.30	1,150.00	8,395.00
Andrew J. Polansky	40.60	600.00	24,360.00
Sameer M. Alifarag	62.20	820.00	51,004.00
Brooke L. Nitti	15.30	600.00	9,180.00
Devorah Hirsch	0.60	325.00	195.00
Shawne M. Keenan	3.30	500.00	1,650.00
	527.80		532,063.00

**DISBURSEMENTS**

Trip #2310 Philadelphia Fulcrum - Meyers, Todd C. – Travel	1,164.95
Lien searches/Cogency Global Inc.; Shawne Keenan – Professional Services	7,152.47
Deposition/Transcription - Joshus Nahas/Reliable Copy Service, Inc. dba Reliable; Jennifer B. Kimble – Professional Services	1,374.38
Transcript/Depositions - Mark Smith, Steven Victor/Reliable Copy Service, Inc. dba Reliable; Jennifer B. Kimble – Professional Services	4,234.43

**DISBURSEMENTS**

T#2207 Wilmington DE Fulcrum Hearing 10.9 - Kimble, Jennifer B. - Wilmington, DE – Travel	572.88
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<b>Total Current Disbursements</b>	<b>\$14,499.11</b>
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<b>TOTAL CURRENT BILLING</b>	<b>\$546,562.11</b>
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EVERSHEDS  
SUTHERLAND

**Eversheds Sutherland (US) LLP**

999 Peachtree Street NE  
Suite 2300  
Atlanta, GA 30309-3996

T: +1 404 853 8000

eversheds-sutherland.com

IRS Employer ID No: 58-0619407

**Electronic Remittance Instructions:**

Bank Name: Wells Fargo Bank, N.A.  
Acct Name: Eversheds Sutherland (US) LLP  
Acct Number: [REDACTED]  
Wire Routing/ABA: [REDACTED]  
ACH Routing: [REDACTED]  
SWIFT Code: [REDACTED]

**Check Remittance Instructions:**

Eversheds Sutherland (US) LLP  
PO Box 931885  
Atlanta, GA 31193-1885

**Fulcrum Official Committee  
c/o Luke Murley  
1201 North Market Street, Suite 2300  
Wilmington, DE 19801**

Bill No. 1324820  
Bill Date December 9, 2024

**Matter No: 98061.0001  
RE: Fulcrum**

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**FOR LEGAL SERVICES RENDERED THROUGH November 30, 2024**

<b>Fees</b>	<b>\$188,605.25</b>
<b>Total Current Disbursements</b>	<b>\$3,847.11</b>
<b>Total Current Bill</b>	<b>\$192,452.36</b>

**FOR LEGAL SERVICES RENDERED THROUGH November 30, 2024****FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK110 - Asset Disposition</b>					
11/01/24	Jennifer B. Kimble	Email with T. Meyers re: sale update (.1); continue reviewing parent lender prepetition sale document production (2.5); call with C. Miller re: sale update (.2); draft and send email to UCC professionals re: sale update (.2).	BK110	3.00	2,925.00
11/01/24	Sameer M. Alifarag	Email correspondences with UCC professionals regarding bid and auction updates.	BK110	0.10	82.00
11/01/24	Todd C. Meyers	Call with Matt Dundon regarding bids (.1); review waste management sale objection (.1); review bid update (.1); exchange with Jennifer Kimble regarding same (.1).	BK110	0.40	574.00
11/02/24	Jennifer B. Kimble	Emails with C. Miller re: bid updates (.1); email with T. Meyers re: sale updates (.1); continue reviewing Parent Lender Prepetition Sale Document Production (.8).	BK110	1.00	975.00
11/02/24	Todd C. Meyers	Email to Jennifer Kimble regarding bid status.	BK110	0.10	143.50
11/04/24	Sameer M. Alifarag	Email correspondences with UCC professionals regarding qualified bids.	BK110	0.10	82.00
11/04/24	Jennifer B. Kimble	Review updates from S. Lee (Layer 7 Capital) re: bids (.3); emails with C. Miller and T. Meyers re: bid updates and deposits received (.6); call with T. Meyers re: sale update (.2); review and analyze various bids received for assets (3.0); emails with UCC professionals (ES, Dundon & Layer 7) re: bids received and comparison of bids received by Debtors (.4); continue reviewing parent lender prepetition sale documents (.5); call with J. Waxman re: auction and bid update (.2).	BK110	5.20	5,070.00
11/04/24	Todd C. Meyers	Email exchanges Steve Lee regarding status (.2); exchanges regarding bids and review same (2.4); review PCL term sheet and exchange Curtis Miller regarding same (.2).	BK110	2.80	4,018.00
11/05/24	Todd C. Meyers	Numerous exchanges and review of bids (1.7); exchange with MNAT regarding Topco stipulation and review revisions to same (.3); review Airgas objection (.1).	BK110	2.10	3,013.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/05/24	Sameer M. Alifarag	Review of Airgas limited objection to cure and update objection tracker regarding same (.1); attention to sale documents and cure lists regarding same (.3).	BK110	0.40	328.00
11/05/24	Jennifer B. Kimble	Emails with J. Nahas re: bids and bid information (.4); email with M. Dundon re: auction attendance (.1); review Debtors comments to PCL credit bid (.1); emails with T. Meyers re: PCL credit bid (.2); emails with C. Miller re: call to discuss bids (.1); review bid issue information received from MNAT (.3); call with T. Meyers re: bids and auction update (.2); emails with UCC professionals re: auction attendance (.2); emails with J. Nahas re: bid summary (.3); review Dundon Bid summary (.2); review Airgas Limited Cure Objection (.1).	BK110	2.20	2,145.00
11/06/24	Sameer M. Alifarag	Attention to email correspondences with Committee regarding Dundon analysis of bids (.1); review of same (.2); review of debtor reply in support of Water Supply Agreement assumption (.2).	BK110	0.50	410.00
11/06/24	Jennifer B. Kimble	Review and analyze updated PCL credit bid term sheet (.3); emails with C. Carlisle and MNAT team re: sale update and qualification of bidders for auction (.5); emails with UCC team re: baseline bid and qualification of bidders (.2); review Debtors' Reply to TRIGID Objection to Sale (.2); work through various sale issues (.1); review various exhibit and witness lists filed related to Sale Hearing (.3).	BK110	1.60	1,560.00
11/06/24	Todd C. Meyers	Email exchanges regarding bid updates (.2); review revised PCL bid and various exchanges regarding same (.4); review witness list (.1); review reply to objection (.2); exchanges with Jennifer Kimble regarding PCL bid (.1); review debtor reservation of rights (.1).	BK110	1.10	1,578.50
11/07/24	Todd C. Meyers	Attend auction (5.0); review reply to Trigid objection (.2); review notice of deposition and exchange with Jennifer Kimble regarding same (.2); review hearing agenda (.1); review Johnson Matthey objection (.1); review witness list (.1).	BK110	5.70	8,179.50



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/07/24	Sameer M. Alifarag	Email correspondences with J. Kimble regarding auction updates (.2); email correspondences with Committee and professionals regarding results of same (.1); review of Johnson Matthey objection to cure (.1); update internal tracker of cure and sale objections (.1).	BK110	0.50	410.00
11/07/24	Jennifer B. Kimble	Attend Fulcrum Auction.	BK110	5.00	4,875.00
11/08/24	Todd C. Meyers	Analyze various issues related to sale of Topco assets (.5); debtor email regarding Abengoa objection (.1); review Caterpillar objection (.1); exchanges with Linde regarding removal of equipment (.2); debtor email regarding exhibit (.1); exchanges with debtor regarding status (.1); review Feedstock order and email Jennifer Kimble regarding same (.4); review switch order and email Jennifer Kimble regarding same (.4); review revised APAs and email exchanges regarding same (.7); exchanges regarding sale order and conference with Jennifer Kimble regarding same (.3).	BK110	2.90	4,161.50
11/08/24	Jennifer B. Kimble	Review Notice of Successful Bidders (.1); emails with S. Lee re: data center communications (.2); emails with T. Meyers and M. Dundon re: sales process and claims (.3); review First Day Hearing Transcript and follow up with T. Meyers re: mechanic lien questions (.3); multiple emails with MNAT team re: Switch Sale Order and Waste Management APA (.5); multiple emails and telephone call with T. Meyers re: sale information and orders (.6); review Waste Management APA (.7); review updated Switch APA (1.0); review and edit Waste Management Sale Order (2.4); multiple emails with MNAT and T. Meyers re: WM Sale Order and sale order language re: proceeds (.5); call with C. Miller and C. Carlisle re: sale orders and APAs (.2); email with MNAT re: TRIGID deposition scheduling (.1); review emails from MNAT re: sale hearing evidence (.1); call with C. Carlisle re: TRIGID evidence and witness availability for deposition (.1); review Caterpillar Cure Objection (.1).	BK110	7.20	7,020.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/09/24	Jennifer B. Kimble	Review and comment on updated Switch APA (1.2); review and revise Waste Management APA (1.4); review and revise Switch Sale Order (1.1); review further update versions of Waste Management and Switch Sale Orders (1.0); call and emails with T. Meyers re: sale orders and APAs and necessary changes (.5); multiple emails with MNAT re: revisions to Waste Management and Switch Sale Orders and APAs (.6); review final version of Waste Management APA and Sale Order and sign off on the same with Debtors (.5); email with C. Carlisle re: Switch Sale Order (.1); review DIP Order re: application of sale proceeds (.2); review emails from T. Meyers re: DIP Language (.1); review settlement term sheet and DIP hearing transcript and correspondence with T. Meyers re: the same (.3).	BK110	7.00	6,825.00
11/09/24	Todd C. Meyers	Work on orders and APAs and email exchanges with debtor regarding same.	BK110	1.50	2,152.50
11/10/24	Jennifer B. Kimble	Review Victor and Smith Sale Declarations (.5); review Motion in Limine re: Trigid testimony (.4).	BK110	0.90	877.50
11/10/24	Sameer M. Alifarag	Review declarations in support of sale, and motion in limine in connection with same (.9); review of latest cure objections (.2).	BK110	1.10	902.00
11/10/24	Todd C. Meyers	Various exchanges regarding sale issues and review filings.	BK110	0.50	717.50
11/11/24	Todd C. Meyers	Various exchanges regarding resolution of objections (.4); review pleadings regarding same (.5); conference with Adam Goldberg regarding status (.1); calls and exchanges with Curtis Miller regarding Topco resolution (.4).	BK110	1.40	2,009.00
11/11/24	Andrew J. Polansky	Review auction transcript, declarations in support of sale.	BK110	0.30	180.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/11/24	Jennifer B. Kimble	Review and analyze TRIGID sale objection documents and respond to T. Meyers inquiry re: the same (.6); review proposed revisions to sale order language (.3); emails with T. Meyers re: sale hearing and objections (.3); emails with S. Alifarag re: sale hearing preparations and evidentiary binders (.3); various emails with T. Meyers and MNAT re: resolution of remaining sale objections (.4); call with C. Carlisle re: remaining TRI and JM objections to sale/ status of agreement to language for Sale Order (.2); review redline Biorefinery Sale Order and ensure all changes conform with auction/ agreement (1.0); review Motion to Shorten as related to Motion in Limine re: TRIGID deposition/evidence (.1).	BK110	3.20	3,120.00
11/11/24	Sameer M. Alifarag	Attention to documents for November 12 sale hearing (.7); email correspondences with Ann Zakewicz regarding creation of binders for same (.2); finalize sale and cure objection tracker and email correspondences with ES team regarding status of same (.2).	BK110	1.10	902.00
11/12/24	Sameer M. Alifarag	Review of sale orders (.5); call with ES team and Doug Buckley regarding potential mechanics lien issues in connection with sale (.2); attend November 12 sale hearing in Wilmington, Delaware (2.0).	BK110	2.70	2,214.00
11/12/24	Jennifer B. Kimble	Emails with T. Meyers and Dundon team re: parent asset sale (.4); call with MNAT, Katten and ES re: parent asset sale and carve out for estate from proceeds (.6); call with C. Carlisle re: Abengoa Sale Order language (.1); call with D. Buckley re: Abengoa sale order language (.2); review Abengoa Sale order language and sign off on the same with Debtors (.2); review Switch APA re: Catalyst language (.6); calls and emails with Debtors re: sale issues re: JMD catalysts/ cans (.4); review JMD and TRI sale order language (.3); prepare for Sale Hearing (1.0); attend Sale Hearing (2.5).	BK110	6.30	6,142.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/12/24	Todd C. Meyers	Exchange with Curtis Miller regarding Topco credit bid proposal (.1); Sameer Alifarag email regarding objection status (.1); review revised agenda (.1); exchange with clerk regarding Abengoa (.1); email regarding Abengoa order language (.1); exchanges with Curtis Miller regarding Rustic Canyon claims (.1); call with Curtis Miller and Josh Altman regarding Topco proposal (.4); call with Doug Buckley regarding various open issues (.2); attend hearing (2.5); confer with parties regarding resolution of JM/Switch issues (.5); call with Curtis Miller regarding same (.2).	BK110	4.40	6,314.00
11/13/24	Todd C. Meyers	Various conferences regarding resolution of open sale issues and review order and APA changes regarding same (1.1); review amended agenda (.1); conference with parties and prepare for hearing (.9); attend hearing (1.0).	BK110	3.10	4,448.50
11/13/24	Sameer M. Alifarag	Correspondences with J. Kimble regarding resolution of sale motion (.1); dial in to continued sale hearing via zoom (.4).	BK110	0.50	410.00
11/13/24	Jennifer B. Kimble	Review Sale Order language received from Switch re: cans (.1); emails with T. Meyers re: APA language and Switch Order language (.2); Call with MNAT/ Bondholders re: Switch language (.3); review and revise Switch sale order language re: cans/ catalyst (.2); emails with MNAT and Bondholders re: sale order language (.2); emails with T. Meyers and C. Miller re: resolution of Switch sale issues (.1); review and edit revised Switch APA language (.2); revise and edit updated Switch Sale Order (.3); attend Sale hearing (1.0).	BK110	2.60	2,535.00
11/14/24	Jennifer B. Kimble	Emails with C. Miller and T. Meyers re: status of APA and Sale Orders (.3); review updated Switch APA language on Cans/ Catalyst (.2); review and sign off on final sale orders with MNAT team (.6); emails with T. Meyers re: final sale orders (.2); email with C. Miller (MNAT) re: timing of sale closings (.1).	BK110	1.40	1,365.00
11/14/24	Todd C. Meyers	Email MNAT regarding status (.1); review APA and exchanges with MNAT regarding same (.2); review Switch revisions and exchanges regarding same (.2); exchange regarding Topco bid (.1); exchange with debtors regarding closing (.1).	BK110	0.70	1,004.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/15/24	Jennifer B. Kimble	Emails with C. Miller regarding status of sale closings.	BK110	0.20	195.00
11/15/24	Todd C. Meyers	Email exchanges regarding closing status.	BK110	0.20	287.00
11/15/24	Sameer M. Alifarag	Review of redlines of entered sale orders.	BK110	0.30	246.00
11/17/24	Jennifer B. Kimble	Emails with J. Waxman re: sales proceeds inquiry and calculation of Layer 7 fee.	BK110	0.20	195.00
11/17/24	Todd C. Meyers	Emails regarding closing status (.1); exchanges with Curtis Miller regarding Topco credit bid (.2).	BK110	0.30	430.50
11/18/24	Jennifer B. Kimble	Call with C. Miller re: status of sale closing and transfer taxes (.3); call with T. Meyers re: transfer taxes (.1); emails with C. Miller re: sale closing (.2); email with S. Lee re: status of sale closings (.1); email with J. Waxman (Morris James) re: 11/21 sale hearing status (.1); review transcript from sale hearings (.5); emails with Debtors and Bondholders re: sale of parent assets (.3).	BK110	1.60	1,560.00
11/18/24	Todd C. Meyers	Conference with Jennifer Kimble regarding closing issues (.1); exchange with Curtis Miller regarding same (.1); email exchanges with Curtis Miller and Doug Buckley regarding Topco solution (.3).	BK110	0.50	717.50
11/19/24	Jennifer B. Kimble	Emails with C. Miller and T. Meyers re: status of sale closings (.2); call with T. Meyers re: parent asset sale (.3); emails with J. Altman and C. Miller re: call to discuss sale of parent assets (.2); call with Katten and MNAT re: parent asset sale (.6); call with T. Meyers re: parent sale, sale hearing and next steps (.3); email with J. Waxman re: parent asset sale hearing on 11/21 (.1); review and analyze various drafts of PCL credit bid (.5); emails with T. Meyers re: PCL credit bid and 11/21 sale hearing (.3).	BK110	2.50	2,437.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/19/24	Todd C. Meyers	Call with Curtis Miller regarding closing status (.3); review hearing agenda and exchange with Jennifer Kimble (.2); review Topco credit bid and exchange with Jennifer Kimble regarding same (.2); exchange with Curtis Miller regarding same (.1); exchange with Josh Altman regarding Topco (.6); conference with Jennifer Kimble regarding same (.2); exchange with Jeff Waxman regarding status (.1); emails regarding switch closing status (.1).	BK110	1.80	2,583.00
11/20/24	Jennifer B. Kimble	Emails with T. Meyers re: parent asset sale (.2); review Abengoa Supplemental Objection to Parent Asset Sale (.3).	BK110	0.50	487.50
11/20/24	Todd C. Meyers	Review Abengoa objection.	BK110	0.10	143.50
11/21/24	Jennifer B. Kimble	Call with J. Waxman re: sale closings and next steps (.2); emails with Dundon Team and Layer 7 Team re: proposed Sale Waterfall (.3); review and analyze Sale Waterfall (.5); email with T. Meyers re: parent sale update (.2); emails with Debtor, Bondholder and Committee professionals re: waterfall, issues in application of sales proceeds and coordination of call to discuss the same (.7).	BK110	1.90	1,852.50
11/21/24	Todd C. Meyers	Call with Curt Miller and Josh Altman regarding Topco proposal (.5); exchange with Curt Miller regarding same (.1); analyze waterfall and emails regarding same (.7); exchange Steve Lee regarding Layer 7 commission on feedstock sale (.1); review Dundon waterfall analysis (.2).	BK110	1.60	2,296.00
11/22/24	Jennifer B. Kimble	Calls with T. Meyers re: sales proceeds waterfall (.3); review and analyze DIP and Sale Orders re: sale proceeds application/ estate proceeds and compare to proposed waterfall (.8); call with Debtors, bondholders and advisors re: sales waterfall (.6); follow up email with MNAT re: sales proceeds allocation (.1).	BK110	1.80	1,755.00
11/22/24	Todd C. Meyers	Analyze waterfall for call (.7); all hands call regarding same (.5); email Dundon regarding same (.1); call with Jennifer Kimble regarding various sale issues (.2).	BK110	1.50	2,152.50
11/25/24	Todd C. Meyers	Exchange with debtor regarding rejection motion.	BK110	0.10	143.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/30/24	Jennifer B. Kimble	Review Motion to Reject Executory Contracts.	BK110	0.20	195.00
<b>Fees for BK110 - Asset Disposition</b>				<b>95.90</b>	<b>107,346.50</b>
<b>BK130 - Case Administration and Analysis</b>					
11/01/24	Todd C. Meyers	Review hearing agenda and exchange with Sameer Alifarag regarding adjournment of stay relief motion.	BK130	0.10	143.50
11/01/24	Jennifer B. Kimble	Review Notice of Agenda for 11/5 hearing.	BK130	0.10	97.50
11/15/24	Cynthia Wyke-Garrett	Research court docket; forward pleadings to docketing.	BK130	0.20	75.00
11/19/24	Todd C. Meyers	Call with Curtis Miller and Josh Altman regarding Topco solution.	BK130	0.50	717.50
11/19/24	Jennifer B. Kimble	Review Notice of Agenda for 11/21 hearing.	BK130	0.10	97.50
11/21/24	Todd C. Meyers	Exchanges with Jennifer Kimble regarding various issues.	BK130	0.20	287.00
11/21/24	Jennifer B. Kimble	Emails with S. Alifarag and A. Polansky re: board discovery.	BK130	0.20	195.00
11/22/24	Sameer M. Alifarag	Review of deposition transcript of Mark Smith (1.2); email correspondences with J. Kimble regarding identity of insiders (.2).	BK130	1.40	1,148.00
11/22/24	Jennifer B. Kimble	Email with G. Hill re: information requests (.2); emails with S. Alifarag re: board information from Smith deposition and D&O research (.2); review deposition information (.1); begin drafting document request letter (.7); call with T. Meyers re: D&O questions (.2).	BK130	1.40	1,365.00
11/24/24	Sameer M. Alifarag	Review of schedules and statements (.9); draft internal memorandum regarding D&O information (.8); email correspondences with T. Meyers and J. Kimble regarding same (.1).	BK130	1.80	1,476.00
11/24/24	Jennifer B. Kimble	Finish drafting and revise document request letter to Debtors (.5); email with T. Meyers re: draft document request letter (.1).	BK130	0.60	585.00
11/24/24	Todd C. Meyers	Jennifer Kimble email to debtor regarding document request.	BK130	0.10	143.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/25/24	Jennifer B. Kimble	Revise document request letter (.5); emails with T. Meyers re: document requests and Dundon information requests (.2); emails with T. Meyers re: weekly committee call (.2).	BK130	0.90	877.50
11/25/24	Todd C. Meyers	Call with Topco tax structuring possibility (.3); review letter to debtor and exchange with Jennifer Kimble regarding same (.2); review Sameer Alifarag memo regarding D&O analysis (.2).	BK130	0.70	1,004.50
11/26/24	Jennifer B. Kimble	Emails with T. Meyers re: document request letter (.2); revise document request letter (.3); email to C. Miller re: document requests (.1); emails with T. Meyers re: document request letter (.2); revise document request letter (.3); email to C. Miller re: document requests (.1).	BK130	1.20	1,170.00
11/26/24	Todd C. Meyers	Review regarding revised document request and exchange with Jennifer Kimble regarding same (.1); exchange regarding Abengoa issues (.1); exchange regarding wind down budget (.1).	BK130	0.30	430.50
11/27/24	Jennifer B. Kimble	Emails with G. Hill and T. Meyers re: fee estimates (.1); email with S. Alifarag re: tracking objection deadlines for Committee fee applications (.1); call with C. Miller and C. Carlisle re: document request letter and timing of production (.2).	BK130	0.40	390.00
<b>Fees for BK130 - Case Administration and Analysis</b>				<b>10.20</b>	<b>10,203.00</b>

**BK140 - Claims Adm. and Objections**

11/06/24	Jennifer B. Kimble	Email with MNAT regarding conversion of parent debt to equity (.2); email with B. Gelfand regarding conversion information (.1).	BK140	0.30	292.50
11/07/24	Jennifer B. Kimble	Email updates to committee re: status (.5); email and call with L. Murley re: mechanic lien question (.3); draft and send update to Committee regarding the auction results (.6); emails with T. Meyers and Dundon team re: Committee Call (.1); email with Linde re: auction questions (.1).	BK140	1.60	1,560.00
11/10/24	Jennifer B. Kimble	Email with L. Murley re: contract assumption questions.	BK140	0.20	195.00



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/12/24	Jennifer B. Kimble	Review Fulcrum Bioenergy Inc. Schedules to determine identity of various creditors (.2); emails with MNAT and T. Meyers re: lenders included in convertible debt (.2).	BK140	0.40	390.00
11/12/24	Sameer M. Alifarag	Email correspondences with internal ES team regarding Rustic Canyon claim analysis.	BK140	0.10	82.00
11/15/24	Jennifer B. Kimble	Emails with Dundon team re: unsecured convertible notes.	BK140	0.20	195.00
11/17/24	Jennifer B. Kimble	Review Fulcrum Bioenergy Schedules and respond to inquiry re: Rustic Canyon claims.	BK140	0.30	292.50
11/18/24	Jennifer B. Kimble	Review and analyze emails re: convertible notes (.5); gather information from First Day Declaration and send to Dundon team re: convertible notes (secured and unsecured) (.4); review security information for convertible notes (.2).	BK140	1.10	1,072.50
11/18/24	Todd C. Meyers	Various email exchanges regarding Topco debt (.3); exchanges with Josh Altman regarding same (.2).	BK140	0.50	717.50
11/25/24	Jennifer B. Kimble	Review docket and confirm no contract rejection motions filed (.2) email with C. Miller and C. Carlisle re: contract rejection (.2); email with Dundon team re: preliminary waterfall analysis (.2).	BK140	0.60	585.00
<b>Fees for BK140 - Claims Adm. and Objections</b>				<b>5.30</b>	<b>5,382.00</b>

**BK141 - Lien Investigation**

11/01/24	Rebecca A. Gelfand	Collateral review for Nuveen and Newtop transactions.	BK141	3.10	3,177.50
11/04/24	Rebecca A. Gelfand	Review security agreements for Nuveen and Newtop.	BK141	1.40	1,435.00
11/04/24	Todd C. Meyers	Exchange with Becky Gelfand regarding foreign collateral.	BK141	0.10	143.50
11/06/24	Todd C. Meyers	Email Becky Gelfand regarding Newtop debt.	BK141	0.10	143.50
11/06/24	Rebecca A. Gelfand	Analyze possible conversion of secured notes to equity.	BK141	0.20	205.00
11/19/24	Jennifer B. Kimble	Review email from B. Gelfand re: parent loans and missing information (.1); emails with T. Meyers and B. Gelfand re: status of lien review and next steps (.2).	BK141	0.30	292.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/19/24	Todd C. Meyers	Exchange with Becky Gelfand regarding Topco, liens (.1); email exchange with Jennifer Kimble regarding Topco lien analysis (.1).	BK141	0.20	287.00
11/19/24	Rebecca A. Gelfand	Review status of PCL liens.	BK141	0.50	512.50
11/20/24	Rebecca A. Gelfand	Analyze issues relating to PCL name change.	BK141	0.50	512.50
11/20/24	Jennifer B. Kimble	Email with C. Carlisle (MNAT) re: parent loan assignment from Nuveen to PCL (.1); review information received regarding PCL (.2); email with B. Gelfand re: parent loan documentation (.1).	BK141	0.40	390.00
11/20/24	Todd C. Meyers	Review email to MNAT regarding Topco lender assignment.	BK141	0.10	143.50
11/21/24	Jennifer B. Kimble	Review email from B. Gelfand re: PCL perfection (.1); follow up regarding open parent loan issues (.2).	BK141	0.30	292.50
<b>Fees for BK141 - Lien Investigation</b>				<b>7.20</b>	<b>7,535.00</b>

**BK160 - Fee/Employment Applications**

11/04/24	Sameer M. Alifarag	Email correspondences with Rosa Sierra-Fox of US Trustee's office, ES team, Layer 7 team, and local counsel regarding Layer 7 retention application issues.	BK160	0.20	164.00
11/04/24	Jennifer B. Kimble	Emails with T. Meyers and S. Park re: additional disclosures for ES Retention (.2); follow up on Layer 7 Capital Retention App Objection Deadline (.1); emails with C. Carlisle and T. Meyers re: Layer 7 Retention Order language (.2); revise Layer 7 Retention Order (.3); review UST comments to Layer 7 Retention application (.2).	BK160	1.00	975.00
11/04/24	Todd C. Meyers	Review UST comments regarding Layer 7 application.	BK160	0.10	143.50
11/04/24	Todd C. Meyers	Exchanges regarding Layer 7 retention.	BK160	0.10	143.50
11/05/24	Jennifer B. Kimble	Emails with J. Waxman re: Layer 7 Retention Order Comments (.2); review revised Layer 7 Retention Order language (.1).	BK160	0.30	292.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/06/24	Jennifer B. Kimble	Emails with S. Lee re: Layer 7 Retention Order and DIP language and resolution of issues with retention order (.5); call with J. Waxman re: revisions to Layer 7 retention (.2).	BK160	0.70	682.50
11/06/24	Todd C. Meyers	Exchanges with Steve Lee regarding retention and fee issues.	BK160	0.20	287.00
11/08/24	Todd C. Meyers	Exchange with Steve Lee regarding commission issues.	BK160	0.10	143.50
11/11/24	Sameer M. Alifarag	Draft first monthly fee application and related notices and exhibits (2.6); email correspondences with J. Kimble regarding same (.1); review of local rules in connection with same (.2).	BK160	2.90	2,378.00
11/11/24	Jennifer B. Kimble	Emails with S. Alifarag re: ES Monthly Fee Statement.	BK160	0.10	97.50
11/12/24	Todd C. Meyers	Review Layer 7 sale contact timeline.	BK160	0.10	143.50
11/15/24	Jennifer B. Kimble	Begin to review and revise draft ES first monthly fee statement.	BK160	0.70	682.50
11/18/24	Todd C. Meyers	Exchange with Jennifer Kimble regarding monthly fee application.	BK160	0.10	143.50
11/18/24	Jennifer B. Kimble	Email with J. Waxman re: Layer 7 compensation Application (.1); email with J. Waxman re: status of Eversheds Monthly Fee Application (.1); emails with T. Meyers re: ES Monthly Fee Statement (.3).	BK160	0.50	487.50
11/19/24	Jennifer B. Kimble	Calls and emails with T. Meyers re: fee application status (.2); work on drafting monthly fee statement (.3).	BK160	0.50	487.50
11/20/24	Todd C. Meyers	Exchange with Jennifer Kimble regarding fee application.	BK160	0.10	143.50
11/20/24	Jennifer B. Kimble	Emails with T. Meyers and J. Waxman re: timing of filing monthly fee statements; (.2); draft Eversheds monthly fee statement (1.6).	BK160	1.80	1,755.00
11/21/24	Todd C. Meyers	Revise first monthly fee application and email Jennifer Kimble regarding same.	BK160	0.70	1,004.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/21/24	Jennifer B. Kimble	Gather and summarize expense details and additional attorney information for Fee Application (.6); emails with T. Meyers re: draft fee statement (.3); further revise fee application to incorporate T. Meyers comments (.8); emails with J. Waxman re: monthly fee statements and objection deadline (.2); email with J. Waxman re: Dundon fee application (.1).	BK160	2.00	1,950.00
11/22/24	Jennifer B. Kimble	Emails with J. Waxman re: Dundon fee app and hearing date (.2); review revised UCC fee applications (.3); emails with J. Waxman re: committee comments and filing fee applications (.2).	BK160	0.70	682.50
11/22/24	Sameer M. Alifarag	Email correspondences with Committee and Committee professionals regarding monthly fee application (.1); review of same (.1).	BK160	0.20	164.00
11/22/24	Todd C. Meyers	MNAT email regarding Layer 7 fee.	BK160	0.10	143.50
<b>Fees for BK160 - Fee/Employment Applications</b>				<b>13.20</b>	<b>13,094.50</b>

**BK180 - Financing**

11/01/24	Todd C. Meyers	Exchange with Jennifer Kimble and Kramer Levin regarding extension on CDs.	BK180	0.30	430.50
11/01/24	Jennifer B. Kimble	Emails and call with T. Meyers re: request to Kramer for extension re: challenge period (.3); call with D. Buckley (Kramer) re: CDs and longer term extension (.2).	BK180	0.50	487.50
11/04/24	Jennifer B. Kimble	Emails with B. Gelfand re: parent level liens and asset review.	BK180	0.30	292.50
11/06/24	Todd C. Meyers	Email MNAT regarding conversion of notes.	BK180	0.10	143.50
11/10/24	Jennifer B. Kimble	Email with T. Meyers re: challenge deadline and mechanic lien questions.	BK180	0.20	195.00
11/10/24	Todd C. Meyers	Exchange with Jennifer Kimble regarding CD deadline.	BK180	0.10	143.50
11/21/24	Todd C. Meyers	Email Jennifer Kimble regarding CD challenge deadline (.1); review Becky Gelfand email regarding name change issue at Topco (.2).	BK180	0.30	430.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/22/24	Jennifer B. Kimble	Call with T. Meyers re: challenge deadline and next steps (.3); email with D. Buckley (Kramer) re: further extension of Challenge Period (.1); review letter of credit information and prepare for call with D. Buckley (.3); call with D. Buckley re: challenge period (.3); draft and send email to D. Buckley confirming extension of challenge period (.5); emails with T. Meyers re: challenge period (.1); call with T. Meyers re: challenge issues and next steps (.3).	BK180	1.90	1,852.50
11/22/24	Sameer M. Alifarag	Email correspondences with UMB and bondholders' counsel regarding extension of challenge period.	BK180	0.10	82.00
11/22/24	Cynthia Wyke-Garrett	Forward S. Alifarag e-mail to docketing regarding the extension of the challenge period to December 10; e-mail to S. Alifarag regarding same.	BK180	0.10	37.50
11/22/24	Todd C. Meyers	Exchange with Jennifer Kimble regarding CD challenge status and review emails regarding same.	BK180	0.30	430.50
11/26/24	Jennifer B. Kimble	Telephone calls with D. Buckley re: Abengoa challenge extension (.3); email update to T. Meyers re: Abengoa (.1).	BK180	0.40	390.00
11/27/24	Todd C. Meyers	Various exchanges regarding Abengoa stipulation and review same (1.1); call with debtor and bond counsel regarding same (.6).	BK180	1.70	2,439.50
11/27/24	Jennifer B. Kimble	Emails with T. Meyers re: Abengoa Challenge Extension and Stipulation (.3); emails with Debtors and Bondholders re: Abengoa Stipulation (.4); review and analyze Stipulation (.4); call with Debtors and Bondholders re: Abengoa Stipulation re: setoff claim (.3); review further revised Stipulation (.3); emails with Debtors and Bondholders re: stipulation and further extension of Abengoa challenge period (.2); review C. Miller comments to Stipulation (.1).	BK180	2.00	1,950.00
11/28/24	Todd C. Meyers	Review revised Abengoa stipulation and exchanges regarding same (.2); exchange with Jennifer Kimble regarding COC stipulation (.1).	BK180	0.30	430.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/29/24	Jennifer B. Kimble	Email with T. Meyers re: expiration of challenge period (.1); further emails with Debtors and Bondholders re: Abengoa Stipulation (.4); review revised Abengoa Stipulation (.3).	BK180	0.80	780.00
11/29/24	Todd C. Meyers	Review revised Abengoa stipulation and exchanges regarding same.	BK180	0.20	287.00
11/30/24	Jennifer B. Kimble	Review COC re: Abengoa Stipulation.	BK180	0.10	97.50
<b>Fees for BK180 - Financing</b>				<b>9.70</b>	<b>10,900.00</b>

**BK200 - Meetings of Creditors**

11/01/24	Todd C. Meyers	Luke Murley email regarding committee member recusal issue.	BK200	0.10	143.50
11/04/24	Sameer M. Alifarag	Draft October 30 committee meeting minutes (.3); email correspondences with J. Kimble regarding same (.1).	BK200	0.40	328.00
11/05/24	Sameer M. Alifarag	Email correspondences with Committee regarding overview of bids and status of auction.	BK200	0.10	82.00
11/05/24	Jennifer B. Kimble	Draft and send email update to Committee with bids (.3); draft and send email to Committee with summary of bids (.1).	BK200	0.40	390.00
11/05/24	Todd C. Meyers	Email committee regarding status (.1); further committee email regarding status (.1).	BK200	0.20	287.00
11/06/24	Jennifer B. Kimble	Email with committee member re: auction update and next committee call (.1); email with Committee member re: sale update (.2).	BK200	0.30	292.50
11/08/24	Sameer M. Alifarag	Attend Committee Call.	BK200	0.50	410.00
11/08/24	Jennifer B. Kimble	Email with S. Alifarag re: Committee call attendees (.1); prepare for and attend Committee Call (.7); emails with J. Weiss re: purchaser questions (.3); call with S. Alifarag re: sending information to J. Weiss (.1).	BK200	1.20	1,170.00
11/08/24	Todd C. Meyers	Prepare for committee call (.2); committee call (.5).	BK200	0.70	1,004.50
11/10/24	Sameer M. Alifarag	Draft November 8 committee meeting minutes (.3); email correspondences with J. Kimble regarding same (.1).	BK200	0.40	328.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/10/24	Sameer M. Alifarag	Email correspondences with Committee regarding proposed revised sale orders.	BK200	0.20	164.00
11/10/24	Todd C. Meyers	Exchange with committee member regarding contract assumptions.	BK200	0.10	143.50
11/11/24	Jennifer B. Kimble	Email with Committee member re: status of sale objections and treatment of various contracts.	BK200	0.20	195.00
11/12/24	Jennifer B. Kimble	Emails with Committee regarding continuation of sale hearing.	BK200	0.20	195.00
11/13/24	Todd C. Meyers	Emails to committee regarding status.	BK200	0.20	287.00
11/13/24	Sameer M. Alifarag	Email correspondences with Committee regarding meeting (.1); follow up call and email correspondences with Linde and Apex regarding same (.1).	BK200	0.20	164.00
11/13/24	Jennifer B. Kimble	E-mails with Committee professionals and Committee members re: rescheduling weekly committee call due to continued sale hearing (.3); emails with S. Alifarag re: scheduling Committee Call (.2); draft and send email to Committee re: sale approval (.2).	BK200	0.70	682.50
11/14/24	Sameer M. Alifarag	Correspondences with J. Kimble regarding meeting agenda (.1); draft same (.1); email correspondences with Committee regarding same (.1); dial in to committee call (.5); review of Dundon financial update (.1).	BK200	0.90	738.00
11/14/24	Jennifer B. Kimble	Emails with S. Alifarag re: Committee Call Agenda and attendees (.1); review and revise Agenda (.1); email with Dundon Team re: financial update for Committee (.1); call and email with T. Meyers re: committee call agenda and presentation (.1); email with R. Berindean re: call to discuss sale (.1); prepare for and attend Committee meeting (.6); email with Committee re: entered sale orders and projected sale closing (.2).	BK200	1.30	1,267.50
11/14/24	Todd C. Meyers	Review agenda (.1); prepare for call (.3); committee call (.5); email committee regarding orders (.1).	BK200	1.00	1,435.00
11/19/24	Jennifer B. Kimble	Emails with Dundon team re: materials for Committee call (.1); draft agenda for weekly Committee call (.1); emails with T. Meyers re: weekly call materials (.1).	BK200	0.30	292.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/20/24	Sameer M. Alifarag	Review of November 20 committee meeting agenda (.1); draft November 14 committee meeting minutes (.3); email correspondences with J. Kimble regarding same (.1); dial in to November 20 committee call (.6).	BK200	1.10	902.00
11/20/24	Jennifer B. Kimble	Revise 11/20 Committee Call Agenda (.1); email with Committee re: call agenda (.1); prepare for and attend Committee Call (.9); emails with Committee member re: purchaser inquiry (.2).	BK200	1.30	1,267.50
11/20/24	Todd C. Meyers	Prepare for committee call (.3); attend committee call (.6).	BK200	0.90	1,291.50
11/21/24	Jennifer B. Kimble	Email with Committee Member regarding lender inquiry.	BK200	0.10	97.50
11/22/24	Jennifer B. Kimble	Draft email to Committee re: UCC professionals first monthly fee applications and follow up correspondence with Committee members re: the same.	BK200	0.30	292.50
11/25/24	Todd C. Meyers	Committee member email regarding recovery and analysis and exchange with Jennifer Kimble regarding same (.2); committee member email regarding contract rejection (.1); email committee regarding status and this week's meeting (.1).	BK200	0.40	574.00
11/25/24	Jennifer B. Kimble	Email with committee member re: recovery inquiry (.2); emails with committee cancelling weekly call (.1); make notes for 12/4 Call Agenda (.2); review and respond to committee member question re: contract rejection (.1).	BK200	0.60	585.00
11/26/24	Sameer M. Alifarag	Draft November 20 committee meeting minutes (.3); email correspondences with J. Kimble regarding same (.1).	BK200	0.40	328.00
<b>Fees for BK200 - Meetings of Creditors</b>				<b>14.70</b>	<b>15,337.50</b>

**BK310 - Travel Time**

11/06/24	Todd C. Meyers	Billed at Half Rate Travel to Delaware for auction.	BK310	2.00	1,435.00
11/06/24	Jennifer B. Kimble	Billed at Half Rate Travel to Wilmington, DE for auction.	BK310	3.50	1,706.25
11/07/24	Jennifer B. Kimble	Billed at Half Rate Return Travel home from Auction in Wilmington, DE.	BK310	3.00	1,462.50



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
11/07/24	Todd C. Meyers	Billed at Half Rate Travel from Wilmington.	BK310	3.00	2,152.50
11/12/24	Jennifer B. Kimble	Billed at Half Rate Travel to/from Wilmington, DE for sale hearing.	BK310	5.00	2,437.50
11/12/24	Sameer M. Alifarag	Billed at Half Rate Travel to/from Wilmington, Delaware.	BK310	5.00	2,050.00
11/12/24	Todd C. Meyers	Travel to Delaware for sale hearing.	BK310	3.60	2,583.00
11/13/24	Todd C. Meyers	Billed at Half Rate Travel from Wilmington.	BK310	3.00	2,152.50
11/13/24	Jennifer B. Kimble	Billed at Half Rate Travel to/from Wilmington, DE for continued Sale Hearing.	BK310	5.80	2,827.50
<b>Fees for BK310 - Travel Time</b>				<b>33.90</b>	<b>18,806.75</b>
Total Hours/Fees				190.10	\$188,605.25

**SUMMARY OF LEGAL SERVICES**

<b>TIMEKEEPER</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Todd C. Meyers	11.60	717.50	8,323.00
Todd C. Meyers	44.20	1,435.00	63,427.00
Jennifer B. Kimble	17.30	487.50	8,433.75
Jennifer B. Kimble	87.50	975.00	85,312.50
Rebecca A. Gelfand	5.70	1,025.00	5,842.50
Andrew J. Polansky	0.30	600.00	180.00
Sameer M. Alifarag	5.00	410.00	2,050.00
Sameer M. Alifarag	18.20	820.00	14,924.00
Cynthia Wyke-Garrett	0.30	375.00	112.50
	190.10		188,605.25

**DISBURSEMENTS**

Travel Expenses to Fulcrum Auction 11/7 - Kimble, Jennifer B. T# 2497 – Travel	1,470.13
Travel Expenses Wilmington, DE 11/12 to 11/15 - Meyers, Todd C., Trip 2556 – Travel	1,231.99
Travel Expenses Wilmington, DE Fulcrum Cont. Sale Hearing Jennifer B. Kimble T #2546 – Travel	666.27
Travel Expenses Wilmington, DE 11/12/24 - Sameer Alifarag Trip 2549 – Travel	221.47
Travel Expenses Wilmington, DE Fulcrum Cont. Sale Hearing 11/13/24 Jennifer B. Kimble T#2560 – Travel	257.25

**Total Current Disbursements****\$3,847.11**

**TOTAL CURRENT BILLING**

**\$192,452.36**

EVERSHEDS  
SUTHERLAND

**Eversheds Sutherland (US) LLP**

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Suite 2300  
Atlanta, GA 30309-3996

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eversheds-sutherland.com

IRS Employer ID No: 58-0619407

**Electronic Remittance Instructions:**

Bank Name: Wells Fargo Bank, N.A.  
Acct Name: Eversheds Sutherland (US) LLP  
Acct Number: [REDACTED]  
Wire Routing/ABA: [REDACTED]  
ACH Routing: [REDACTED]  
SWIFT Code: [REDACTED]

**Check Remittance Instructions:**

Eversheds Sutherland (US) LLP  
PO Box 931885  
Atlanta, GA 31193-1885

**Fulcrum Official Committee  
c/o Luke Murley  
1201 North Market Street, Suite 2300  
Wilmington, DE 19801**

Bill No. 1328313  
Bill Date January 14, 2025

**Matter No: 98061.0001  
RE: Fulcrum**

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**FOR LEGAL SERVICES RENDERED THROUGH December 31, 2024**

<b>Fees</b>	<b>\$132,098.50</b>
<b>Total Current Disbursements</b>	<b>\$2,430.50</b>
<b>Total Current Bill</b>	<b>\$134,529.00</b>

**FOR LEGAL SERVICES RENDERED THROUGH December 31, 2024****FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK110 - Asset Disposition</b>					
12/02/24	Jennifer B. Kimble	Emails with Bondholders re: sale proceeds waterfall and closing costs (.1); emails with T. Meyers re: closing costs (.2); review Rejection Motion (.2).	BK110	0.50	487.50
12/02/24	Sameer M. Alifarag	Review of omnibus motion to reject contracts (.1); email correspondences with J. Weiss of Linde regarding same (.1).	BK110	0.20	164.00
12/02/24	Todd C. Meyers	Review rejection motion (.1); exchange with Linde regarding same (.1); exchange regarding closing expenses in waterfall (.1).	BK110	0.30	430.50
12/03/24	Todd C. Meyers	Emails regarding Topco sale status (.1); exchange with Doug Buckley regarding Topco issues (.1); call with Curtis Miller regarding Topco and other issues (.5); call with Jennifer Kimble regarding same (.1).	BK110	0.80	1,148.00
12/03/24	Todd C. Meyers	Various exchanges regarding waterfall and closing cost issues.	BK110	0.50	717.50
12/03/24	Jennifer B. Kimble	Email with T. Meyers re: sale closing costs and response to Bondholders (.2); review settlement term sheet re: closing costs arguments (.2); review and analyze sale waterfall scenario A and B (.1); email with C. Miller re: distribution of sale proceeds (.1); call with T. Meyers re: sales proceeds waterfall and sale of parent assets (.2); review final waterfall (.2); email with J. Waxman and M. Dundon re: Layer 7 fees included in waterfall (.1); emails with T. Meyers and D. Buckley re: plan term sheet as part of sale (.2); call with T. Meyers re: plan terms (.2).	BK110	1.50	1,462.50
12/04/24	Jennifer B. Kimble	Emails with T. Meyers and G. Hill re: sale waterfall.	BK110	0.20	195.00
12/04/24	Todd C. Meyers	Dundon email regarding waterfall.	BK110	0.10	143.50
12/05/24	Jennifer B. Kimble	Call with L. Murley re: Johnson Matthey purchase of cans/catalysts and status of discussions with the Debtors (.3); call and email with T. Meyers re: possible sale of cans/catalysts (.2).	BK110	0.50	487.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/05/24	Todd C. Meyers	Conference with Jennifer Kimble regarding purchase of Topco assets.	BK110	0.10	143.50
12/09/24	Todd C. Meyers	Various exchanges with Curtis Miller regarding Topco offer (.3); call with Curtis Miller regarding same (.6).	BK110	0.90	1,291.50
12/10/24	Jennifer B. Kimble	Email with T. Meyers re: revised offer for sale of certain parent assets (.2); emails with C. Miller and C. Carlisle re: status of sale to JMD (.2).	BK110	0.40	390.00
12/10/24	Todd C. Meyers	Email with Jennifer Kimble regarding PCL deal (.1); email to debtor regarding catalyst (.1).	BK110	0.20	287.00
12/11/24	Jennifer B. Kimble	Email with C. Carlisle re: status of discussions with JDM re: can/catalyst sale (.2); Email with S. Alifarag re: DSI fees and sale waterfall (.2).	BK110	0.40	390.00
12/11/24	Todd C. Meyers	Exchange with Clint Carlisle regarding catalyst sale status.	BK110	0.10	143.50
12/12/24	Jennifer B. Kimble	Review update on PCL credit bid and release of proceeds.	BK110	0.20	195.00
12/12/24	Todd C. Meyers	Exchanges with Curtis Carlisle regarding Topco deal.	BK110	0.20	287.00
12/17/24	Sameer M. Alifarag	Review of sale and plan term sheet.	BK110	0.40	328.00
12/17/24	Jennifer B. Kimble	Email correspondence with C. Miller re: status of PCL credit bid for parent assets and next steps.	BK110	0.10	97.50
12/17/24	Todd C. Meyers	Email Curtis Miller regarding Topco deal (.1); call with Curtis Miller regarding regarding same and other issues (.3); exchange with Clint Carlisle regarding Catalyst sale (.1); debtor email regarding Topco sale term sheet (.1).	BK110	0.60	861.00
12/18/24	Jennifer B. Kimble	Review email re: plan and sale term sheet (.1); high level review of plan and sale term sheet (.2); emails and call with C. Miller re: parent asset sale (.4); call with T. Meyers re: sale update (.2).	BK110	0.90	877.50
12/18/24	Todd C. Meyers	Call with Jennifer Kimble regarding PCL request to sell IP to third parties.	BK110	0.20	287.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/19/24	Todd C. Meyers	Review motion and order regarding Catalyst agreement and exchange with Jennifer Kimble regarding same (.5); review Catalyst APA (.3); further exchanges with Jennifer Kimble regarding above and regarding PCL purchase (.2); review plan and sale term sheet (.9).	BK110	1.90	2,726.50
12/19/24	Jennifer B. Kimble	Review and analyze Catalyst APA (.8); review and mark up Catalyst private sale motion (.9); review and mark up proposed order on Catalyst sale motion (.5); emails with T. Meyers re: APA and Sale Motion (.3); review T. Meyers comments to sale motion and order and further mark up (.4); review and analyze plan and sale term sheet and make notes re: the same (1.0); call and emails with T. Meyers re: plan term sheet (.4).	BK110	4.30	4,192.50
12/19/24	Sameer M. Alifarag	Email correspondences with C. Carlisle, T. Meyers and J. Kimble regarding catalyst sale APA and related sale motion (.1); review of same (.6); email correspondences with T. Meyers, J. Kimble, and debtors' counsel regarding issues with plan and sale term sheet (.1).	BK110	0.80	656.00
12/20/24	Sameer M. Alifarag	Email correspondences with ES team and debtors' counsel regarding comments to sale motion, and review of same (.1); review and analysis of motion to extend time to assume or reject unexpired leases (.2).	BK110	0.30	246.00
12/20/24	Todd C. Meyers	Review Topco sale and term sheet (.4); call with MNAT regarding same (.6); exchange with Jennifer Kimble regarding same (.1); Jennifer Kimble email regarding Catalyst comments (.1); exchange with Matt Dundon regarding same (.1).	BK110	1.30	1,865.50
12/20/24	Jennifer B. Kimble	Call with MNAT (Curtis Miller, Clint Carlisle, Rob Dehney) re: parent asset sale (.7); mark up Catalyst sale documents (.6); email with MNAT team re: Catalyst sale documents (.1); respond to J. Altman email re: PCL communications with buyers (.1); emails with T. Meyers re: plan and sale term sheet (.2); call with T. Meyers re: releases and next steps (.2).	BK110	1.90	1,852.50
12/21/24	Todd C. Meyers	Review redline of Catalyst sale motion (.1); Josh Altman email regarding discussions with Blue Arrow (.1).	BK110	0.20	287.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/21/24	Jennifer B. Kimble	Review email from T. Meyers re: lease extension motion.	BK110	0.20	195.00
12/23/24	Jennifer B. Kimble	Email with J. Altman re: parent asset sale (.1); review information received from C. Carlisle re: catalyst sale and updated APA (.3); follow up correspondence with T. Meyers and C. Miller re: status of discussions over plan and sale term sheet (.3); review plan and sale term sheet (.2); review Motion to Extend Time to Reject Non-Residential Real Property leases (.2); emails with G. Hill re: Sparks warehouse lease and monthly payments (.2).	BK110	1.30	1,267.50
12/23/24	Todd C. Meyers	Review Clint Carlyle email regarding Catalyst sale (.1); exchange with Jennifer Kimble regarding same (.1); further exchanges with MNAT regarding same (.2); review escrow agreement (.1).	BK110	0.50	717.50
12/24/24	Sameer M. Alifarag	Email correspondences with debtors' counsel and Eversheds team regarding issues in connection with sale of CANS (.1); review and analysis of revised asset purchase agreement (.4).	BK110	0.50	410.00
12/24/24	Jennifer B. Kimble	Emails with C. Miller and C. Carlisle re: JMD Catalyst Sale issues (.2); review email re: parent sale APA and timing of filing (.2).	BK110	0.40	390.00
12/25/24	Todd C. Meyers	Exchange with Curtis Miller regarding sale motion timing.	BK110	0.10	143.50
12/26/24	Sameer M. Alifarag	Email correspondences with T. Meyers and J. Kimble regarding motion to extend time to assume or reject unexpired leases.	BK110	0.10	82.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/26/24	Jennifer B. Kimble	Emails with T. Meyers and C. Miller re: JMD Catalyst sale and specific performance remedy (.2); review Catalyst APA redline (.4); emails with T. Meyers re: PCL Sale APA (.2); review and analyze T. Meyers comments to PCL Sale APA (.3); review PCL Sale APA and mark additional comments (1.0); email with T. Meyers re: PCL sale agreement comments (.2); emails with C. Carlisle and C. Miller re: additional PCL sale agreement comments (.3); email with C. Carlisle re: cans/ catalyst APA, Sale Motion and Order (.1); review further mark up of PCL Sale Agreement (.4); emails and calls with T. Meyers re: revised PCL Sale Agreement (.5); review information from Dundon on Sparks warehouse monthly payments (.1); review Sparks warehouse lease (.2); email with T. Meyers re: sparks lease payments (.1).	BK110	4.00	3,900.00
12/26/24	Todd C. Meyers	Email regarding Catalyst deal (.1); exchange with Jennifer Kimble regarding warehouse lease (.1); review and revise PCL APA (1.0); review Jennifer Kimble comments and exchange regarding same (.2); review Catalyst sale order email from Jennifer Kimble (.1); Jennifer Kimble email regarding Catalyst motion status (.1); review revised agreement and exchanges regarding same (.5); Clint Carlyle email regarding comments to APA (.1).	BK110	2.20	3,157.00
12/27/24	Sameer M. Alifarag	Email correspondences regarding proposed sale of parent assets (.1); review of finalized sale motion (.3).	BK110	0.40	328.00
12/27/24	Jennifer B. Kimble	Review revised plan and sale term sheet (.2); mark up plan term sheet (.3); further review of Parent Sale Agreement (.4); emails with T. Meyers re: same (.2); call with C. Miller, T. Meyers and J. Altman re: parent sale documents (.5); follow up correspondence with MNAT re: JMD sale documents (.2); review updated JMD sale motion and sale agreement (.3); review and revise draft PCL Sale Order (.9); emails with T. Meyers re: PCL Claims (.2); analyze PCL Proofs of Claim (.3); email with T. Meyers re: warehouse lease and confirmation that only remaining unexpired lease (.1).	BK110	3.60	3,510.00



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/27/24	Todd C. Meyers	Review term sheets in connection with PCL sale (.9); call with PCL and debtor regarding same (.5); conference with Jennifer Kimble regarding same (.1); email to Jennifer Kimble with comments to term sheets (.2); exchange with Jennifer Kimble regarding Catalyst sale proceeds (.1); exchange with Jennifer Kimble regarding retention of lease (.1); review revised Catalyst sale documents and exchange with Jennifer Kimble regarding same (.2).	BK110	2.10	3,013.50
12/29/24	Jennifer B. Kimble	Call with T. Meyers re: parent sale documents (.2); review email from T. Meyers re: parent sale order comments (.1); emails with T. Meyers re: comments to sale and plan term sheet and plan term sheet (.2).	BK110	0.50	487.50
12/29/24	Todd C. Meyers	Conference with Jennifer Kimble regarding PCL sale issues (.2); review and revise and edit order on PCL sale (1.0).	BK110	1.20	1,722.00
12/30/24	Jennifer B. Kimble	Review revised PCL APA (.4); review T. Meyers comments to revised APA (.2); incorporate revisions into PCL APA (1.0); call with T. Meyers re: PCL APA (.3); revise PCL Sale Order (.8); emails with T. Meyers re: revised sale order (.3); review revised sale and plan term sheet (.3); incorporate Committee comments into sale and plan term sheets (.5); emails with T. Meyers re: revised plan term sheet (.2).	BK110	4.00	3,900.00
12/30/24	Todd C. Meyers	Review revised PCL APA and email Jennifer Kimble regarding comments to same (.6); review Jennifer Kimble revisions to APA and exchange regarding same (.2); exchanges with Clint Carlisle regarding term sheets (.1); revise and edit PCL order and email Jennifer Kimble regarding same (.3).	BK110	1.20	1,722.00
12/31/24	Todd C. Meyers	Review revised sale order and exchanges with Jennifer Kimble (.3); review sale term sheet and revise same (.4); call with Jennifer Kimble regarding above (.1); call with Jennifer Kimble and Josh Altman (.4); exchange with Curtis Miller regarding comments to order (.1).	BK110	1.30	1,865.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/31/24	Jennifer B. Kimble	Emails with T. Meyers and J. Altmann re: call to discuss PCL Sale Agreement (.2); calls with T. Meyers re: PCL Sale Order (.3); call with T. Meyers and J. Altmann re: PCL Sale Agreement (.5); revise PCL Sale Order (.5); email with MNAT and J. Altmann re: revised PCL Sale order (.2); respond to C. Miller email re: PCL sale order language (.2); mark up Plan Term Sheet and send comments to T. Meyers (.8); emails with T. Meyers re: term sheet comments (.2).	BK110	2.90	2,827.50
<b>Fees for BK110 - Asset Disposition</b>				<b>46.50</b>	<b>52,279.00</b>

**BK130 - Case Administration and Analysis**

12/05/24	Todd C. Meyers	Conference and emails with Jennifer Kimble regarding various issues.	BK130	0.20	287.00
12/06/24	Todd C. Meyers	Email Sameer Alifarag regarding amended schedules.	BK130	0.10	143.50
12/06/24	Sameer M. Alifarag	Review and analysis of amended schedules (1.3); email correspondences with ES team regarding same (.3); review of debtors' motion to extend time to remove civil actions (.1).	BK130	1.70	1,394.00
12/19/24	Jennifer B. Kimble	Review Docket re: omnibus hearing dates.	BK130	0.10	97.50
12/21/24	Todd C. Meyers	Review various motions and exchanges with Jennifer Kimble regarding same.	BK130	0.40	574.00
<b>Fees for BK130 - Case Administration and Analysis</b>				<b>2.50</b>	<b>2,496.00</b>

**BK140 - Claims Adm. and Objections**

12/03/24	Jennifer B. Kimble	Email with T. Meyers re: Bar Date Motion (.1); review Bar Date Motion (.3); call with S. Alifarag re: Bar Date Motion (.2).	BK140	0.60	585.00
12/03/24	Sameer M. Alifarag	Review of bar date motion, order and notices (.6); call with J. Kimble regarding same (.2).	BK140	0.80	656.00
12/03/24	Todd C. Meyers	Exchange with Sameer Alifarag regarding bar date order.	BK140	0.10	143.50
12/05/24	Jennifer B. Kimble	Email with S. Alifarag re: comments to bar date motion.	BK140	0.20	195.00
12/05/24	Sameer M. Alifarag	Further review and analysis of bar date documents (.5); correspondences with J. Kimble regarding same (.2).	BK140	0.70	574.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/07/24	Sameer M. Alifarag	Email correspondences with J. Kimble regarding bar date document review (.1); email correspondences with debtors' counsel regarding comments to bar date order (.1).	BK140	0.20	164.00
12/07/24	Jennifer B. Kimble	Review S. Alifarag summary of revisions to Debtors' Schedules (.1); email with S. Alifarag re: coordinating with Debtors on necessary revisions to Bar Date Order (.1).	BK140	0.20	195.00
12/07/24	Todd C. Meyers	Review Sameer Alifarag summary of schedules and amendments and exchanges regarding same.	BK140	0.20	287.00
12/08/24	Jennifer B. Kimble	Review correspondence from T. Meyers re: revisions to Debtors' schedules. .	BK140	0.10	97.50
12/09/24	Sameer M. Alifarag	Email correspondences with debtors' counsel regarding air force claim information request.	BK140	0.10	82.00
12/09/24	Jennifer B. Kimble	Email with S. Alifarag re: Air Force claim question (.1); review response on Air Force claim received from Debtors (.1); review updated schedules (.1).	BK140	0.30	292.50
12/09/24	Todd C. Meyers	Exchange with Jennifer Kimble and debtor regarding Government claim in revised schedules.	BK140	0.20	287.00
12/10/24	Jennifer B. Kimble	Email with S. Alifarag re: following up with Debtors on Bar Date Order revisions.	BK140	0.10	97.50
12/11/24	Sameer M. Alifarag	Follow up email correspondences with debtors' counsel regarding bar date order.	BK140	0.10	82.00
12/16/24	Jennifer B. Kimble	Email from M. Chovanes re: Hilltop Management Partners (.1); H. Stoughton reach out re: same (.1).	BK140	0.20	195.00
12/17/24	Sameer M. Alifarag	Email correspondences with C. Carlisle and J. Kimble regarding revised bar date order and certification of counsel regarding same (.2); review of same (.1).	BK140	0.30	246.00
12/17/24	Jennifer B. Kimble	Review email from C. Carlisle re: revised Bar Date Order (.1); email with S. Alifarag re: revised Bar Date Order (.1); review redline bar date order (.1).	BK140	0.30	292.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/18/24	Sameer M. Alifarag	Email correspondences with J. Kimble regarding entry of bar date order (.1); email correspondences with Committee regarding same (.1).	BK140	0.20	164.00
<b>Fees for BK140 - Claims Adm. and Objections</b>				<b>4.90</b>	<b>4,635.50</b>

**BK141 - Lien Investigation**

12/02/24	Jennifer B. Kimble	Email with C. Miller and C. Carlisle re: information on CDs and Letter of Credit.	BK141	0.20	195.00
12/03/24	Jennifer B. Kimble	Emails and call with C. Curtis re: CDs and LOC (.5); review additional DACAs received from C. Miller (.2).	BK141	0.70	682.50
12/03/24	Todd C. Meyers	Exchanges regarding CD ownership and conference with Jennifer Kimble regarding same and other issues.	BK141	0.40	574.00
12/04/24	Jennifer B. Kimble	Review email from T. Meyers re: CDs (.1); draft and send update to T. Meyers re: call with C. Miller and status of CD investigation and open issues (.7).	BK141	0.80	780.00
12/04/24	Todd C. Meyers	Curtis Miller email regarding DACAs (.1); exchanges with Jennifer Kimble regarding same and regarding CDs (.2).	BK141	0.30	430.50
12/10/24	Todd C. Meyers	Email with Jennifer Kimble regarding CDs (.1); email with Curtis Miller regarding same (.1).	BK141	0.20	287.00
12/10/24	Jennifer B. Kimble	Email with C. Miller re: status of discussions with Refuse Inc re: LOC/ CDs (.1); review email re: CDs (.1); review response from C. Miller on CDs (.1).	BK141	0.30	292.50
12/17/24	Todd C. Meyers	Exchange with Jennifer Kimble regarding CDs (.1); review letter to Nevada regarding letter of credit (.1).	BK141	0.20	287.00
12/17/24	Jennifer B. Kimble	Emails with T. Meyers re: CD information (.2); follow up with C. Miller re: status of discussions with Waste Management re: letter of credit (.2); review Debtors' letter to Waste Management (.2).	BK141	0.60	585.00
12/23/24	Todd C. Meyers	Exchanges regarding CD status and extension.	BK141	0.20	287.00
12/27/24	Jennifer B. Kimble	Emails with B. Gelfand re: parent asset lien review and debt validation.	BK141	0.20	195.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/27/24	Rebecca A. Gelfand	Analyze potential foreign patent issues and prepare for conference call.	BK141	0.20	205.00
12/27/24	Todd C. Meyers	Exchange with Becky Gelfand regarding lien and claim review.	BK141	0.10	143.50
12/28/24	Jennifer B. Kimble	Emails with B. Gelfand and T. Meyers re: call to discuss parent loans.	BK141	0.10	97.50
12/29/24	Jennifer B. Kimble	Call with T. Meyers and B. Gelfand re: parent loan document review and validation.	BK141	0.40	390.00
12/29/24	Rebecca A. Gelfand	Call with T. Meyers and J. Kimble re: parent loan document review and validation (.4); analyze liens at holding company (1.1).	BK141	1.50	1,537.50
12/29/24	Todd C. Meyers	Call with Jennifer Kimble and Becky Gelfand regarding PCL liens and Claim (.4); Becky Gelfand email regarding foreign patents (.1); email regarding excluded subsidiaries (.1).	BK141	0.60	861.00
12/30/24	Rebecca A. Gelfand	Research UCC in relation to foreign patents.	BK141	1.80	1,845.00
<b>Fees for BK141 - Lien Investigation</b>				<b>8.80</b>	<b>9,675.00</b>

**BK160 - Fee/Employment Applications**

12/02/24	Todd C. Meyers	Exchange with Jennifer Kimble regarding fee order.	BK160	0.10	143.50
12/02/24	Jennifer B. Kimble	Email with T. Meyers re: carve out and objection deadline for First Monthly Fee Applications (.1); call with G. Hill re: budget estimates (.1); emails with T. Meyers re: budget estimates (.1); voice message and return telephone call to S. Lee (Layer 7 Capital) (.1); email with S. Park re: information for supplemental retention disclosures (.1).	BK160	0.50	487.50
12/03/24	Jennifer B. Kimble	Call with J. Waxman re: November Fee Applications and Layer 7 Fee Application (.2); email with T. Meyers re: Nov. fee applications (.1); call with T. Meyers re: objection deadline on October fee applications (.1); draft Supplemental Meyers Declaration and send to T. Meyers for review and authority to file (.3).	BK160	0.70	682.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/04/24	Sameer M. Alifarag	Review of ESUS first monthly fee application and interim compensation order (.2); prepare certificate of no objection regarding ESUS first monthly fee application (.2); email correspondences with J. Kimble regarding same (.1).	BK160	0.50	410.00
12/04/24	Todd C. Meyers	Review Eversheds supplemental declaration.	BK160	0.10	143.50
12/04/24	Jennifer B. Kimble	Email with T. Meyers re: Supplemental Declaration (.1); revise Supplement Declaration (.1); review draft CNO on ES First Monthly Fee Statement (.1).	BK160	0.30	292.50
12/05/24	Sameer M. Alifarag	Draft second monthly fee application of Eversheds Sutherland (.7); begin draft of first interim fee application of Eversheds Sutherland (.6).	BK160	1.30	1,066.00
12/05/24	Jennifer B. Kimble	Review and revise CNO for 1st Monthly ES Fee Application (.2); call with C. Carlisle re: fee payments and budget (.3); call and emails with T. Meyers re: fee estimates (.2); email with Jeff Waxman re: fee estimate (.1); email with S. Alifarag re: drafting Nov Fee Statement and First Interim Fee Application (.1).	BK160	0.90	877.50
12/06/24	Sameer M. Alifarag	Further work on first interim fee application of Eversheds Sutherland.	BK160	2.50	2,050.00
12/06/24	Jennifer B. Kimble	Emails with T. Meyers and J. Waxman re: Layer 7 Capital Fee Application (.3); emails with S. Lee re: information for compensation application re: expenses and time records and timing considerations for filing and payment following Court approval (.4); review interim compensation order re: timing of final fee applications and objection period (.2); call with J. Waxman re: draft Layer 7 Fee Application (.2); draft and edit Layer 7 Fee Application (2.7); draft and edit Declaration of S. Lee in support of Fee Application (.6); draft and edit exhibits to fee application (.7).	BK160	5.10	4,972.50
12/06/24	Cynthia Wyke-Garrett	E-mail to J. Kimble regarding T. Meyers' Supplemental Declaration (.1); upload Second Supplemental Declaration of T. Meyers In Support of Application for Entry of an Order Authorizing Retention and Employment of Eversheds Sutherland (US) LLP (.1).	BK160	0.20	75.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/06/24	Todd C. Meyers	Email exchanges with Steve Lee regarding fee application.	BK160	0.20	287.00
12/07/24	Sameer M. Alifarag	Email correspondences with local counsel regarding filing of certificate of no objection on Eversheds fee application (.1); review of Layer 7 first and final fee application and exhibits in support (.3).	BK160	0.40	328.00
12/07/24	Todd C. Meyers	Revise and edit Layer 7 Fee Application and emails regarding same.	BK160	0.40	574.00
12/07/24	Jennifer B. Kimble	Draft and edit proposed order approving Layer 7 Fee Application (.6); review and edit fee application documents and send to T. Meyers for review (1.1).	BK160	1.70	1,657.50
12/08/24	Jennifer B. Kimble	Edit and revise Layer 7 Capital Application to incorporate T. Meyers comments (.2); circulate draft Layer 7 retention application to S. Lee and J. Waxman (.1); work on drafting Eversheds' November Monthly Fee Statement (.6).	BK160	0.90	877.50
12/08/24	Todd C. Meyers	Review revised Layer Seven Application.	BK160	0.10	143.50
12/09/24	Sameer M. Alifarag	Further work on first interim fee application of Eversheds Sutherland (1.5); email correspondences with J. Kimble regarding same (.1); email correspondences with local counsel regarding filing of certificate of no objection on ESUS first monthly fee application (.1).	BK160	1.70	1,394.00
12/09/24	Jennifer B. Kimble	Revise Layer 7 Capital Fee Application to incorporate further comments from T. Meyers (.1); emails with S. Lee re: Layer 7 Fee Application, Declaration and next steps (.2); call with S. Lee re: timing of filing application and potential payment (.2); review revised Layer 7 Capital Summary of Work (.2); edit Eversheds November Fee Statement to add in expense details (.1); call with J. Waxman re: CNO on October Fee Statements and filing of Layer 7 Capital Fee Application (.1).	BK160	0.90	877.50
12/10/24	Sameer M. Alifarag	Review of J. Kimble comments to draft first interim fee application of Eversheds (.2); further work on and revision to same (.2).	BK160	0.40	328.00
12/10/24	Jennifer B. Kimble	Review and revise Eversheds First Interim Fee Application (.5); emails with S. Alifarag re: fee application revisions (.2).	BK160	0.70	682.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/11/24	Jennifer B. Kimble	Emails with J. Waxman and T. Meyers re: Nov. Fee Statement (.1); review November Fee Statement and send to T. Meyers for review (.2).	BK160	0.30	292.50
12/11/24	Todd C. Meyers	Exchange with Jeff Waxman and Jennifer Kimble regarding filing November monthly application (.1); review November monthly application and exchange with Jennifer Kimble regarding same (.2).	BK160	0.30	430.50
12/13/24	Sameer M. Alifarag	Review and finalize second monthly fee statement of Eversheds Sutherland (.2); email correspondences with J. Kimble regarding same (.1).	BK160	0.30	246.00
12/13/24	Jennifer B. Kimble	Follow up with T. Meyers on November Fee Statement revisions (.1); email with J. Waxman and M. Dundon re: November Fee Statements (.1); email with S. Alifarag re: review of November Statement (.1); email with J. Waxman re: final fee applications for filing (.1).	BK160	0.40	390.00
12/16/24	Jennifer B. Kimble	Review and revise 1st Interim Fee Application (.7); email with T. Meyers re: First Interim Fee Application (.1).	BK160	0.80	780.00
12/17/24	Sameer M. Alifarag	Email correspondences with T. Meyers and J. Kimble regarding comments to first interim fee application (.1); further revisions to same (.2).	BK160	0.30	246.00
12/17/24	Todd C. Meyers	Review and revise first interim fee application and exchange with Jennifer Kimble regarding same (.5); exchanges regarding interim fee applications (.1).	BK160	0.60	861.00
12/17/24	Jennifer B. Kimble	Follow up with T. Meyers re: First Interim Fee Application and Compensation Procedure requirements (.1); review T. Meyers comments to First Interim Fee Application (.2); review revised Interim Fee Application and send further comments to S. Alifarag (.3); emails with W. Waxman re: First Interim Fee Application (.1).	BK160	0.70	682.50
12/18/24	Jennifer B. Kimble	Email with T. Meyers re: First Interim Fee Application (.1); send draft fee application to J. Waxman for review and conforming (.1).	BK160	0.20	195.00
12/18/24	Todd C. Meyers	Review revised interim fee application.	BK160	0.10	143.50



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/20/24	Jennifer B. Kimble	Emails with J. Waxman re: First Interim Fee Applications and circulating the same to Committee (.1); review revised fee applications (.1).	BK160	0.20	195.00
12/23/24	Jennifer B. Kimble	Emails with J. Waxman and S. Lee re: Layer 7 Capital Fee Application, responses received and the timing of filing CNO (.1); review and edit Notice of Rate Change (.1).	BK160	0.20	195.00
12/23/24	Sameer M. Alifarag	Email correspondences with J. Kimble regarding notice of rate increase (.1); draft notice of rate increase (.1).	BK160	0.20	164.00
12/27/24	Jennifer B. Kimble	Email with J. Waxman re: omnibus hearing on First Interim Fee Applications (.1); email with D. Depta re: interim fee application language (.1).	BK160	0.20	195.00
12/27/24	Sameer M. Alifarag	Email correspondences with local counsel regarding status of interim fee applications.	BK160	0.10	82.00
12/27/24	Todd C. Meyers	Exchanges with Jennifer Kimble and local counsel regarding interim fee applications.	BK160	0.10	143.50
12/30/24	Jennifer B. Kimble	Emails with J. Waxman re: November Fee Applications CNOs (.1); email with C. Carlisle re: CNO for November fees and payment of the same (.1).	BK160	0.20	195.00
<b>Fees for BK160 - Fee/Employment Applications</b>				<b>24.80</b>	<b>23,786.50</b>

**BK170 - Fee/Employment Objections**

12/02/24	Todd C. Meyers	Brief review of debtor fee applications.	BK170	0.10	143.50
12/03/24	Sameer M. Alifarag	Review of DSI fee application (.4); review MNAT fee application (.1).	BK170	0.50	410.00
12/03/24	Jennifer B. Kimble	Review MNAT October Fee Statement.	BK170	0.10	97.50
12/11/24	Todd C. Meyers	Exchange with Sameer Alifarag regarding DSI Application.	BK170	0.10	143.50
12/11/24	Sameer M. Alifarag	Review fee and expense request in DSI second monthly fee application (.1); email correspondences with T. Meyers and J. Kimble regarding same (.1).	BK170	0.20	164.00
12/20/24	Sameer M. Alifarag	Review and analysis of debtors' motion to employ ordinary course professionals.	BK170	0.10	82.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/26/24	Jennifer B. Kimble	Email with S. Alifarag re: Debtors Ordinary Course Professionals Motion and monthly fee cap (.1); review Ordinary Course Professionals Motion and monthly fee cap and email with T. Meyers re: the same (.1).	BK170	0.20	195.00
12/31/24	Sameer M. Alifarag	Review of Verita second monthly and first interim fee applications.	BK170	0.10	82.00
<b>Fees for BK170 - Fee/Employment Objections</b>				<b>1.40</b>	<b>1,317.50</b>

**BK180 - Financing**

12/02/24	Sameer M. Alifarag	Review of order approving stipulation regarding Abengoa challenge period.	BK180	0.20	164.00
12/03/24	Sameer M. Alifarag	Email correspondences with J. Kimble regarding extension of challenge period.	BK180	0.10	82.00
12/03/24	Jennifer B. Kimble	Emails with D. Buckley re: challenge period extension and information requested from Debtors.	BK180	0.20	195.00
12/11/24	Sameer M. Alifarag	Email correspondences with J. Kimble regarding extension of challenge period.	BK180	0.10	82.00
12/11/24	Todd C. Meyers	Exchange regarding extension on CDs.	BK180	0.10	143.50
12/11/24	Jennifer B. Kimble	Emails with D. Buckley re: further extension of CD challenge period.	BK180	0.20	195.00
12/23/24	Sameer M. Alifarag	Email correspondences with J. Kimble, T. Meyers and Kramer team regarding challenge period extension on CDs.	BK180	0.10	82.00
12/23/24	Jennifer B. Kimble	Emails with C. Miller re: status of discussions with Waste Management over letter of credit (.2); follow up with D. Buckley re: further extension of the challenge period (.1).	BK180	0.30	292.50
12/24/24	Jennifer B. Kimble	Confirmation with D. Buckley of extension of challenge period on CD.	BK180	0.10	97.50
<b>Fees for BK180 - Financing</b>				<b>1.40</b>	<b>1,333.50</b>

**BK190 - Litigation General**

12/13/24	Sameer M. Alifarag	Email correspondences with debtors' counsel regarding debtors' response to committee request for production.	BK190	0.10	82.00
12/13/24	Todd C. Meyers	Review letter regarding document production.	BK190	0.10	143.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/14/24	Jennifer B. Kimble	Review document production cover letter and emails received from MNAT (.2); email with S. Alifarag re: document production (.1).	BK190	0.30	292.50
12/15/24	Jennifer B. Kimble	Email with S. Alifarag re: document review and next steps.	BK190	0.20	195.00
12/16/24	Sameer M. Alifarag	Email correspondences with J. Kimble and ESUS Litigation Support Team regarding debtor document production upload and review.	BK190	0.20	164.00
12/16/24	Jennifer B. Kimble	Analyze document requests and work through document review protocol (.4); emails with litigation support and S. Alifarag re: uploading production into Relativity and hosting logistics (.3).	BK190	0.70	682.50
12/17/24	Jennifer B. Kimble	Emails with S. Alifarag re: document review protocol and what to look for in document production (.2); review various produced documents (.5).	BK190	0.70	682.50
12/17/24	Ematchia L. Brown	Load and prepare document production for attorney review.	BK190	1.80	450.00
12/17/24	Sameer M. Alifarag	Review of debtors' discovery production in connection with Committee request.	BK190	1.80	1,476.00
12/18/24	Jennifer B. Kimble	Correspondence with S. Alifarag re: status of document review and types of information produced.	BK190	0.20	195.00
12/18/24	Sameer M. Alifarag	Review of discovery documents from debtors' production.	BK190	3.20	2,624.00
12/19/24	Sameer M. Alifarag	Further review of discovery documents from debtors' production.	BK190	5.60	4,592.00
12/20/24	Sameer M. Alifarag	Email correspondences with J. Kimble regarding discovery overview (.2); call with Ematchia Brown of Eversheds Litigation Support regarding discovery identifiers (.1).	BK190	0.30	246.00
12/20/24	Jennifer B. Kimble	Call with T. Meyers re: status of document review (.2); follow up with S. Alifarag re: status of document review (.1); review update on document review and identification of key board documents and information (.3).	BK190	0.60	585.00
12/21/24	Todd C. Meyers	Exchanges with Sameer Alifarag and Jennifer Kimble regarding document review.	BK190	0.20	287.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/23/24	Sameer M. Alifarag	Review of discovery documents from debtors' production.	BK190	4.80	3,936.00
12/24/24	Sameer M. Alifarag	Review of discovery documents from debtors' production.	BK190	1.80	1,476.00
12/26/24	Sameer M. Alifarag	Further review of document production.	BK190	4.30	3,526.00
12/26/24	Ematchia L. Brown	Analyze and prepare production documents for attorney review.	BK190	1.50	375.00
12/26/24	Jennifer B. Kimble	Email with S. Alifarag re: document review update and duplicate documents.	BK190	0.20	195.00
12/27/24	Sameer M. Alifarag	Review of discovery production documents.	BK190	3.70	3,034.00
12/28/24	Sameer M. Alifarag	Review of discovery production documents.	BK190	1.10	902.00
12/30/24	Sameer M. Alifarag	Finalize review of debtors' document production (.4); email correspondences with J. Kimble regarding same (.3).	BK190	0.70	574.00
<b>Fees for BK190 - Litigation General</b>				<b>34.10</b>	<b>26,715.00</b>

**BK200 - Meetings of Creditors**

12/03/24	Sameer M. Alifarag	Email correspondences with ES and Dundon teams regarding status of committee updates (.1); email correspondences with Committee regarding same (.1).	BK200	0.20	164.00
12/03/24	Jennifer B. Kimble	Emails with Dundon Advisors team re: weekly committee call materials (.2); call and email with T. Meyers re: cancellation of weekly committee call (.1).	BK200	0.30	292.50
12/03/24	Todd C. Meyers	Email regarding agenda for committee call (.1); exchange with Dundon regarding same (.1).	BK200	0.20	287.00
12/04/24	Todd C. Meyers	Committee email regarding status.	BK200	0.10	143.50
12/04/24	Sameer M. Alifarag	Email correspondences with Committee regarding case updates.	BK200	0.10	82.00
12/04/24	Jennifer B. Kimble	Draft and send weekly email update to Committee re: sales proceeds, rejection motion, bar date and sale of parent assets (.4); follow up emails with T. Meyers re: Committee communication (.2).	BK200	0.60	585.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/10/24	Todd C. Meyers	Email Dundon regarding committee call (.1); review agenda (.1); exchange with Dundon regarding variance report (.1).	BK200	0.30	430.50
12/10/24	Jennifer B. Kimble	Emails with Committee members re: weekly committee call; emails with Dundon team re: moving up weekly call and call agenda (.1); draft agenda for weekly committee call (.1); emails with T. Meyers re: proposed Committee call agenda and confirmation of rescheduled call (.1).	BK200	0.30	292.50
12/10/24	Sameer M. Alifarag	Email correspondences with Committee regarding weekly update call (.1); email correspondences with T. Meyers and J. Kimble regarding meeting agenda, and review of same (.1); email correspondences with Committee regarding same (.1).	BK200	0.30	246.00
12/11/24	Todd C. Meyers	Prepare for Committee Call and exchange with Jennifer Kimble regarding same (.2); Committee Call (.4).	BK200	0.60	861.00
12/11/24	Jennifer B. Kimble	Email with T. Meyers re: materials for weekly Fulcrum Committee Call (.2); prepare for and attend weekly committee call (.6); follow up with committee member re: contract question (.1).	BK200	0.90	877.50
12/11/24	Sameer M. Alifarag	Attend weekly committee call.	BK200	0.40	328.00
12/12/24	Sameer M. Alifarag	Draft December 11 committee meeting minutes (.2); email correspondences with J. Kimble regarding same (.1).	BK200	0.30	246.00
12/13/24	Jennifer B. Kimble	Draft and send email to Committee re: UCC Professionals November Fee Statements.	BK200	0.10	97.50
12/13/24	Sameer M. Alifarag	Email correspondences with Committee regarding proposed committee professional fee applications.	BK200	0.10	82.00
12/17/24	Todd C. Meyers	Exchange with Jennifer Kimble regarding Committee Call (.1); email to Committee regarding status update (.1).	BK200	0.20	287.00
12/17/24	Sameer M. Alifarag	Email correspondences with Committee regarding cancellation of December 18 meeting.	BK200	0.10	82.00
12/17/24	Jennifer B. Kimble	Email with T. Meyers re: weekly Committee Call.	BK200	0.10	97.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
12/18/24	Jennifer B. Kimble	Revise email to Committee re: Bar Date Order.	BK200	0.10	97.50
12/18/24	Todd C. Meyers	Review Committee regarding bar order.	BK200	0.10	143.50
12/21/24	Jennifer B. Kimble	Email with Committee re: First Interim Fee Applications.	BK200	0.10	97.50
12/27/24	Jennifer B. Kimble	Call with T. Meyers re: Committee update (.1); draft, revise and send email update to Committee (.5); emails with Committee members re: same (.1).	BK200	0.70	682.50
12/27/24	Todd C. Meyers	Review and revise committee email regarding status.	BK200	0.10	143.50
12/28/24	Jennifer B. Kimble	Email with S. Alifarag re: scheduling committee call.	BK200	0.10	97.50
12/30/24	Sameer M. Alifarag	Attend conference with committee and professionals (.4); draft committee meeting minutes in connection with same (.3); email correspondences with J. Kimble regarding same (.1).	BK200	0.80	656.00
12/30/24	Jennifer B. Kimble	Email with S. Alifarag re: Committee attendance (.1); call with Committee (.4).	BK200	0.50	487.50
12/30/24	Todd C. Meyers	Prepare for Committee call and exchange with Jennifer Kimble regarding same (.2); Committee call (.4).	BK200	0.60	861.00
<b>Fees for BK200 - Meetings of Creditors</b>				<b>8.30</b>	<b>8,748.00</b>
<b>BK210 - Plan and Disclosure Statement</b>					
12/05/24	Todd C. Meyers	Call with Curtis Miller regarding plan issues (.3); email Jennifer Kimble regarding same (.1).	BK210	0.40	574.00
12/10/24	Jennifer B. Kimble	Email with T. Meyers re: status of plan negotiations and timing for draft plan.	BK210	0.10	97.50
12/20/24	Sameer M. Alifarag	Review and analysis of motion to extend exclusivity period.	BK210	0.20	164.00
12/20/24	Jennifer B. Kimble	Review Debtors' Motion to Extend Exclusivity.	BK210	0.20	195.00
12/26/24	Sameer M. Alifarag	Email correspondences with T. Meyers and J. Kimble regarding exclusivity motion.	BK210	0.10	82.00
<b>Fees for BK210 - Plan and Disclosure Statement</b>				<b>1.00</b>	<b>1,112.50</b>
Total Hours/Fees				133.70	\$132,098.50

**SUMMARY OF LEGAL SERVICES**

<b>TIMEKEEPER</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Todd C. Meyers	24.40	1,435.00	35,014.00
Jennifer B. Kimble	56.20	975.00	54,795.00
Rebecca A. Gelfand	3.50	1,025.00	3,587.50
Sameer M. Alifarag	46.10	820.00	37,802.00
Cynthia Wyke-Garrett	0.20	375.00	75.00
Ematchia L. Brown	3.30	250.00	825.00
	<hr/> 133.70		<hr/> 132,098.50

**DISBURSEMENTS**

Mark Smith/Steven Victor Rough Draft Deposition/Reliable Copy Service, Inc. dba Reliable; Jennifer B. Kimble – Transcript/Deposition	907.00
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T #2552 Fulcrum Travel Expenses- Meyers, Todd C. – Travel	1,523.50
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<b>Total Current Disbursements</b>	<b>\$2,430.50</b>
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<b>TOTAL CURRENT BILLING</b>	<b>\$134,529.00</b>
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EVERSHEDS  
SUTHERLAND

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Suite 2300  
Atlanta, GA 30309-3996

T: +1 404 853 8000

eversheds-sutherland.com

IRS Employer ID No: 58-0619407

**Electronic Remittance Instructions:**

Bank Name: Wells Fargo Bank, N.A.  
Acct Name: Eversheds Sutherland (US) LLP  
Acct Number: [REDACTED]  
Wire Routing/ABA: [REDACTED]  
ACH Routing: [REDACTED]  
SWIFT Code: [REDACTED]

**Check Remittance Instructions:**

Eversheds Sutherland (US) LLP  
PO Box 931885  
Atlanta, GA 31193-1885

**Fulcrum Official Committee  
c/o Luke Murley  
1201 North Market Street, Suite 2300  
Wilmington, DE 19801**

Bill No. 1332515  
Bill Date February 18, 2025

**Matter No: 98061.0001  
RE: Fulcrum**

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**FOR LEGAL SERVICES RENDERED THROUGH January 31, 2025**

<b>Fees</b>	<b>\$178,926.50</b>
<b>Total Current Disbursements</b>	<b>\$191.24</b>
<b>Total Current Bill</b>	<b>\$179,117.74</b>



**FOR LEGAL SERVICES RENDERED THROUGH January 31, 2025****FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK110 - Asset Disposition</b>					
01/01/25	Todd C. Meyers	Work on plan term sheet comments. .	BK110	1.00	1,525.00
01/02/25	Todd C. Meyers	Jennifer Kimble email regarding insider document review(.1); revise email regarding comments to term sheets (.2); exchanges with Curtis Miller regarding same(.2); review changes to sale order and APA; (.4); call with Jennifer Kimble regarding comments to all sale documents (.5); review revised APA and order (.3); review and revise term sheets and various exchanges regarding same (1.5); additional exchanges regarding sale documents (.1).	BK110	3.30	5,032.50
01/02/25	Jennifer B. Kimble	Review PCL comments to APA and Sale Order (.5); further revise PCL APA to incorporate Committee comments (1.2); further revise PCL Sale Order to incorporate Committee comments (1.0); emails with T. Meyers re: revised drafts of PCL APA and Sale Order (.2); call with T. Meyers re: Sale documents and further revisions (.3); emails with MNAT re: revised sale documents (.1).	BK110	3.30	3,547.50
01/03/25	Jennifer B. Kimble	Emails with C. Carlisle re: PCL APA and Sale Order revisions (.3); further revise PCL APA to incorporate revisions (.6); emails with T. Meyers re: revised APA, committee comments and final sign off (.3); email with MNAT and Katten re: UCC revisions to APA (.1); final review and signoff on PCL purchase agreement and sale order (.2) .	BK110	1.50	1,612.50
01/03/25	Todd C. Meyers	Review all sale documents in preparation for all hands call (.3); all hands call (.6); exchanges with Clint Carlisle regarding same (.2); continue review and email comments to sale documents (.7); review filed notices (.2); email Jennifer Kimble regarding preparing response (.1).	BK110	2.10	3,202.50
01/06/25	Todd C. Meyers	Exchange with Jennifer Kimble regarding sale objection deadline.	BK110	0.10	152.50
01/06/25	Sameer M. Alifarag	Review of sale term sheet (.2); review of executed asset purchase agreement (.2).	BK110	0.40	370.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/06/25	Jennifer B. Kimble	Email with T. Meyers re: objection deadline for PCL Sale.	BK110	0.10	107.50
01/07/25	Todd C. Meyers	Various exchanges regarding UST comments to sale motions (.3); revise and edit response to PCL sale and exchanges with Jennifer Kimble regarding same (.4); review revisions to same and exchanges with Jennifer Kimble (.1).	BK110	0.80	1,220.00
01/07/25	Jennifer B. Kimble	Revise statement in support of Fulcrum sales (.7); emails with T. Meyers re: statement in support of sales (.2); email with C. Carlisle re: UST inquiry on JMD sale (.1); review UST questions re: JMD and PCL sale and emails with MNAT and J. Altmann re: the same (.2).	BK110	1.20	1,290.00
01/08/25	Sameer M. Alifarag	Email correspondences with T. Meyers, J. Kimble and debtors' counsel regarding request for extension of objection deadline on PCL sale.	BK110	0.10	92.50
01/08/25	Jennifer B. Kimble	Revise Committee statement on parent asset sales to incorporate T. Meyers comments (.3); review sale order and APA re: D&O claim carveout (.1); email with C. Miller re: extension of Committee objection deadline for PCL Sale (.1).	BK110	0.50	537.50
01/08/25	Todd C. Meyers	Review and revise statement in support of sales (.5); exchanges with Josh Altmann regarding Blue Arrow (.2); emails regarding extension of objection deadline (.2); review revised response and email Jennifer Kimble regarding comments to same (.2); call with Jennifer Kimble regarding same (.3).	BK110	1.40	2,135.00
01/09/25	Todd C. Meyers	Review revised sale orders and exchanges with Jennifer Kimble regarding same.	BK110	0.20	305.00
01/09/25	Jennifer B. Kimble	Email with J. Spier re: foreign patent research (.1); various emails with B. Gelfand and T. Meyers re: additional PCL documents and claim security information (.5); review additional payment requests and budgets received from J. Altmann (.5); review document production for bridge loan security documents and other information relevant to Nuveen claim (1.0); email with C. Miller and C. Carlisle re: Bridge Loan security documents (.1).	BK110	2.20	2,365.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/10/25	Jennifer B. Kimble	Emails with T. Meyers re: current draft of Committee statement on sales and further revisions.	BK110	0.20	215.00
01/12/25	Jennifer B. Kimble	Emails with T. Meyers re: objection to PCL Sale.	BK110	0.10	107.50
01/13/25	Sameer M. Alifarag	Email correspondences with Committee regarding statement in support of sales to PCL and Johnson Matthey (.1); review of declarations in support of sale (.1).	BK110	0.20	185.00
01/13/25	Jennifer B. Kimble	Call with T. Meyers re: status of PCL Claims and statement re: sale (.3); emails with C. Miller re: UCC sale statement, TRI and Abengoa (.2); revise Committee Statement re: PCL and JMD Sales (.3).	BK110	0.80	860.00
01/13/25	Todd C. Meyers	Exchanges with Curtis Miller regarding hearing and status (.2); revise committee statement regarding sales (.3).	BK110	0.50	762.50
01/14/25	Jennifer B. Kimble	Final review of statement in support of sales (.2); review Smith Declarations in support of sales (.2); email with J. Waxman re: Committee Statement re: sales (.1); emails with C. Carlisle re: 1/17 sale hearing (.2); email with C. Carlisle and C. Miller re: draft Committee statement re: sales (.1).	BK110	0.80	860.00
01/14/25	Todd C. Meyers	Review redline of statement by committee (.1); exchanges with Curtis Miller regarding status of lien and claim review (.2).	BK110	0.30	457.50
01/15/25	Jennifer B. Kimble	Review JMD Declaration in Support Sale (.1); email with C. Miller re: 1/17 hearing (.1); review JMD Sale Order (.1).	BK110	0.30	322.50
01/15/25	Todd C. Meyers	Exchange with Jenn Kimble regarding order and review same (.2); review declarations (.2); review hearing agenda (.1).	BK110	0.50	762.50
01/16/25	Jennifer B. Kimble	Review redline of PCL Sale Order.	BK110	0.20	215.00
01/17/25	Sameer M. Alifarag	Email correspondences with J. Kimble regarding PCL sale order (.1); email correspondences with Committee regarding same (.1).	BK110	0.20	185.00
01/17/25	Jennifer B. Kimble	Review revised Agenda (.1) emails with T. Meyers and C. Miller re: cancellation of 1/17 hearing (.1).	BK110	0.20	215.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/17/25	Todd C. Meyers	Review order (.1); review amended agenda (.1); exchange regarding hearing cancellation (.1).	BK110	0.30	457.50
<b>Fees for BK110 - Asset Disposition</b>				<b>22.80</b>	<b>29,100.00</b>
<b>BK130 - Case Administration and Analysis</b>					
01/02/25	Todd C. Meyers	Review hearing agenda.	BK130	0.10	152.50
01/02/25	Jennifer B. Kimble	Review 1/6 hearing agenda.	BK130	0.10	107.50
01/10/25	Todd C. Meyers	Call with potential counsel regarding insider claim analysis.	BK130	0.40	610.00
01/16/25	Sameer M. Alifarag	Review of January 17, 2025 hearing agenda.	BK130	0.10	92.50
01/21/25	Sameer M. Alifarag	Review and analysis of December 2024 monthly operating reports.	BK130	0.20	185.00
01/22/25	Todd C. Meyers	Review MOR and email exchange with Josh Nahas regarding cash position.	BK130	0.20	305.00
<b>Fees for BK130 - Case Administration and Analysis</b>				<b>1.10</b>	<b>1,452.50</b>
<b>BK140 - Claims Adm. and Objections</b>					
01/08/25	Todd C. Meyers	Email mechanic lien claimant's counsel regarding status.	BK140	0.10	152.50
01/08/25	Jennifer B. Kimble	Email with C. Carlisle re: Blue Arrow contract (.1); review Fulcrum Schedules re: Blue Arrow license (.1).	BK140	0.20	215.00
01/22/25	Jennifer B. Kimble	Emails with J. Waxman re: committee claims.	BK140	0.10	107.50
01/23/25	Jennifer B. Kimble	Review information from Dundon re: preferences.	BK140	0.20	215.00
01/24/25	Sameer M. Alifarag	Email correspondences with Eversheds and Dundon teams regarding insider claims (.1); review of statements of financial affairs (.1).	BK140	0.20	185.00
<b>Fees for BK140 - Claims Adm. and Objections</b>				<b>0.80</b>	<b>875.00</b>
<b>BK141 - Lien Investigation</b>					
01/06/25	Todd C. Meyers	Exchanges with Becky Gelfand and Jennifer Kimble regarding status of PCL review and issues.	BK141	0.30	457.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/06/25	Rebecca A. Gelfand	Analyze unsecured term loan agreement and amendments 1-5 and 7-9.	BK141	2.80	3,066.00
01/06/25	Jennifer B. Kimble	Email with B. Gelfand re: PCL loan review status (.1); emails with C. Miller (MNAT) re: release of NV Dept of Conservation letter of credit and related CD (.2); email with D. Buckley re: further extension of challenge period on CDs (.1).	BK141	0.40	430.00
01/07/25	Rebecca A. Gelfand	Review sixth amendment to unsecured term loan agreement (1.0); analyze foreign patent issues (2.1); review secured PCL credit agreement (1.7).	BK141	4.80	5,256.00
01/07/25	Jennifer B. Kimble	Review email from B. Gelfand re: PCL unsecured loan (.2); email with B. Gelfand and T. Meyers re: PCL unsecured loan principal amount (.1); emails with J. Altmann and MNAT Team re: missing unsecured loan documentation (.2); email with B. Gelfand re: missing loan documents (.1); emails with B. Gelfand and J. Spier re: patent lien perfection questions (.2).	BK141	0.80	860.00
01/07/25	Todd C. Meyers	Exchanges regarding foreign patents (.2); exchanges with Becky Gelfand regarding client claims (.2); additional exchanges with Jennifer Kimble regarding PCL claim and lien issues (.2).	BK141	0.60	915.00
01/08/25	Rebecca A. Gelfand	Analyze use of proceeds from funds advanced under PCL secured and unsecured credit agreements and prepare document request for opposing counsel and review responses to same (4.0); call with Todd Meyers and Jenn Kimble regarding same (.7).	BK141	4.70	5,146.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/08/25	Jennifer B. Kimble	Review summary of parent PCL loan (.2); emails with T. Meyers and B. Gelfand re: loan summary and schedule call to discuss the same (.1); call with T. Meyers and B. Gelfand to discuss parent loans (.7); review board resolutions and gather relevant resolutions approving Nuveen Unsecured Note Amendments (1.0); emails with T. Meyers and B. Gelfand re: board documents approving Nuveen loans (.2); email with J. Altmann re: missing parent loan documentation (.2); review additional loan documents received from J. Altmann (.5); email with T. Meyers re: total funded debt by entity (.1); call with T. Meyers re: funded debt at parent level and bond guarantees (.3); review board resolutions and gather relevant resolutions re: Nuveen secured debt at Parent level (.7); emails with T. Meyers and B. Gelfand re: board documents approving secured loan and information re: loan proceeds (.4).	BK141	4.40	4,730.00
01/08/25	Todd C. Meyers	Review PCL unsecured loan analysis (.2); call with Jennifer Kimble and Becky Gelfand regarding loan review issues (.7); review loan documents from PCL (.3); analyze lien and claims including approvals by board (.8); email to Josh Altmann regarding documents needed (.1); exchange with Jennifer Kimble regarding foreign patents (.1).	BK141	2.20	3,355.00
01/09/25	Jennifer B. Kimble	Review emails from C. Carlisle re: sale orders and revisions thereto (.2); review redline of PCL Sale Order (.2); review redline of JMD Sale Order (.1); emails with T. Meyers re: sale orders (.2); email with C. Carlisle signing off on revised sale orders (.1).	BK141	0.80	860.00
01/09/25	Rebecca A. Gelfand	Review historical documentation relating to PCL secured and unsecured loans.	BK141	1.50	1,642.50
01/09/25	Todd C. Meyers	Various exchanges regarding PCL transaction.	BK141	0.30	457.50
01/10/25	Rebecca A. Gelfand	Review historical documentation relating to PCL unsecured loans.	BK141	4.40	4,818.00
01/10/25	Jennifer B. Kimble	Email with C. Miller re: bridge loan security agreement (.1); emails with B. Gelfand and T. Meyers re: loan documentation and open issues (.3); work through open issues related to PCL Debt (.2).	BK141	0.60	645.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/11/25	Jennifer B. Kimble	Email with R. Gelfand and T. Meyers re: Crestline Debenture (.1); locate document and respond to T. Meyers email re: : payoff letters (.2).	BK141	0.30	322.50
01/11/25	Rebecca A. Gelfand	Analyze unsecured debt documentation and review debenture.	BK141	0.30	328.50
01/11/25	Todd C. Meyers	Exchange with Becky Gelfand regarding PCL unsecured claim.	BK141	0.20	305.00
01/12/25	Rebecca A. Gelfand	Analyze unsecured debt documentation and review past board meeting documentation for information relevant to the indebtedness.	BK141	1.50	1,642.50
01/12/25	Todd C. Meyers	Additional exchanges regarding PCL debt documents.	BK141	0.40	610.00
01/12/25	Jennifer B. Kimble	Review various emails from B. Gelfand re: missing loan documentation (.2); review and analyze Board Meeting minutes and approvals for additional loan information and documents requested by B. Gelfand (1.1); draft summary email and send various Crestline notes and convertible debt documents to B. Gelfand for review (.2); review unsecured notes re: fees and interest (.4); email with J. Altmann re: unsecured loan principal calculation (.1); emails with T. Meyers and B. Gelfand re: PCL debt validation (.2).	BK141	2.20	2,365.00
01/13/25	Rebecca A. Gelfand	Review unsecured borrowing requests.	BK141	3.70	4,051.50
01/13/25	Jennifer B. Kimble	Emails with J. Altmann re: unsecured loan back up and missing borrowing base requests (.3); email with B. Gelfand and T. Meyers re: claim back up and missing borrowing requests (.2); review summary of borrowing requests received from J. Altmann (.2).	BK141	0.70	752.50
01/13/25	Todd C. Meyers	Email exchanges with Becky Gelfand and Jenn Kimble and call with Jenn Kimble regarding claim and lien issues.	BK141	0.80	1,220.00
01/14/25	Jennifer B. Kimble	Review email from B. Gelfand re: further verification of PCL unsecured loan (.1); email with J. Altmann re: missing 12/20/23 Borrowing Request (.1); emails with B. Gelfand and T. Meyers re: budgets, open issues and missing borrowing request (.1).	BK141	0.30	322.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/14/25	Rebecca A. Gelfand	Analyze borrowing requests for PCL unsecured debt.	BK141	0.50	547.50
01/14/25	Todd C. Meyers	Further exchanges regarding unsecured claim at Biofuels.	BK141	0.30	457.50
01/21/25	Jennifer B. Kimble	Email with C. Miller re: status of release of letter of credit/ CD .	BK141	0.10	107.50
01/21/25	Todd C. Meyers	Exchange regarding CD status.	BK141	0.10	152.50
01/23/25	Jennifer B. Kimble	Emails with D. Buckley re: extension of challenge period on CD.	BK141	0.10	107.50
<b>Fees for BK141 - Lien Investigation</b>				<b>40.10</b>	<b>45,931.50</b>

**BK160 - Fee/Employment Applications**

01/01/25	Sameer M. Alifarag	Email correspondences with debtors' counsel regarding status of Layer 7 certificate of no objection.	BK160	0.10	92.50
01/02/25	Jennifer B. Kimble	Email with S. Lee re: Certification of No Objection on First and Final Fee Application.	BK160	0.10	107.50
01/06/25	Jennifer B. Kimble	Call with C. Carlisle re: Verita solicitation work and retention application re: the same.	BK160	0.20	215.00
01/10/25	Jennifer B. Kimble	Email with C. Carlisle re: First Interim Fee Applications (.1); review draft order (.2); emails with M. Dundon and J. Waxman re: confirmation of interim fee application amounts (.1).	BK160	0.40	430.00
01/13/25	Jennifer B. Kimble	Email with C. Carlisle re: proposed order on First Interim Fee Applications (.1); email with J. Waxman re: CNO on ES First Interim Fee Application (.1).	BK160	0.20	215.00
01/14/25	Sameer M. Alifarag	Draft third monthly fee application of Eversheds Sutherland (.5); email correspondences with J. Kimble regarding same (.1).	BK160	0.60	555.00
01/15/25	Jennifer B. Kimble	Review and revise December Fee Statement (.1); emails with S. Alifarag re: revisions to December Fee Statement (.1); emails with A. Meng re: chamber comments to Eversheds First Interim Fee Application and revised Order (.1).	BK160	0.30	322.50
01/15/25	Todd C. Meyers	Review third monthly application.	BK160	0.20	305.00



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/15/25	Sameer M. Alifarag	Revise draft third monthly fee application of Eversheds Sutherland.	BK160	0.10	92.50
01/22/25	Jennifer B. Kimble	Emails with T. Meyers and S. Alifarag re: December Fee Application and question about First Interim Fee Application (.1); revise December Fee Statement (.1).	BK160	0.20	215.00
01/23/25	Sameer M. Alifarag	Finalize Eversheds third monthly fee application (.1); email correspondences with T. Meyers, J. Kimble and local counsel regarding same (.1).	BK160	0.20	185.00
01/23/25	Jennifer B. Kimble	Email with S. Alifarag re: information for December Fee Statement (.1); review updated December Fee Statement and email with J. Waxman re: Eversheds December Fee Statement (.2).	BK160	0.30	322.50
01/27/25	Jennifer B. Kimble	Emails with S. Alifarag and T. Meyers re: Verita solicitation application (.1); call with J. Waxman re: Morris James December Fees (.1).	BK160	0.20	215.00
<b>Fees for BK160 - Fee/Employment Applications</b>				<b>3.10</b>	<b>3,272.50</b>

**BK170 - Fee/Employment Objections**

01/03/25	Sameer M. Alifarag	Review revised notices of debtor professionals' fee applications (.1); review first interim fee application of DSI (.2).	BK170	0.30	277.50
01/12/25	Sameer M. Alifarag	Review Morris Nichols and Verita fee applications.	BK170	0.20	185.00
01/14/25	Sameer M. Alifarag	Review of DSI interim fee application.	BK170	0.10	92.50
01/15/25	Todd C. Meyers	Email from clerk regarding interim fee applications.	BK170	0.10	152.50
<b>Fees for BK170 - Fee/Employment Objections</b>				<b>0.70</b>	<b>707.50</b>

**BK180 - Financing**

01/06/25	Sameer M. Alifarag	Email correspondences with J. Kimble and UMB counsel regarding request for extension of challenge period.	BK180	0.10	92.50
01/06/25	Todd C. Meyers	Email exchanges with Jennifer Kimble and Doug Buckley regarding lien challenge extension.	BK180	0.10	152.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/22/25	Todd C. Meyers	Exchange with Jenn Kimble regarding extension on CD challenge.	BK180	0.10	152.50
01/23/25	Todd C. Meyers	Kramer email regarding extension.	BK180	0.10	152.50
01/23/25	Sameer M. Alifarag	Email correspondences with J. Kimble, T. Meyers and D. Buckley of Kramer Levin regarding further challenge period extension.	BK180	0.10	92.50
01/27/25	Sameer M. Alifarag	Email correspondences with Eversheds and Dundon teams regarding waterfall analysis.	BK180	0.10	92.50
<b>Fees for BK180 - Financing</b>				<b>0.60</b>	<b>735.00</b>

**BK190 - Litigation General**

01/06/25	Jennifer B. Kimble	Review and analyze information from S. Alifarag re: Fulcrum document review (.2); spot review of board meeting minutes (.5); begin reviewing and analyzing documents tagged as "hot" during preliminary review (2.2); email with S. Alifarag re: Blue Arrow and Nuveen review (.2).	BK190	3.10	3,332.50
01/07/25	Jennifer B. Kimble	Continue reviewing "hot" documents (1.6); email with S. Alifarag following up on document review (.1).	BK190	1.70	1,827.50
01/08/25	Sameer M. Alifarag	Call with J. Kimble regarding board minute review (.1); review of board minutes from debtors' document production (3.0); email correspondences with T. Meyers, J. Kimble, and R. Gelfand regarding debt refinancing via Nuveen loan (.1); review of documents in connection with same (.8); email correspondences with J. Kimble regarding same (.1).	BK190	4.10	3,792.50
01/09/25	Jennifer B. Kimble	Review Board Meeting minutes (.7); review S. Alifarag summary re: Blue Arrow (.2).	BK190	0.90	967.50
01/09/25	Sameer M. Alifarag	Review and analysis of discovery documents regarding Blue Arrow (3.4); email correspondences with J. Kimble regarding same (.1); follow up email correspondences with T. Meyers and R. Gelfand regarding same (.1).	BK190	3.60	3,330.00
01/11/25	Todd C. Meyers	Review discovery response and exchange with Jennifer Kimble regarding same.	BK190	0.30	457.50
01/16/25	Jennifer B. Kimble	Review documents for information about previous officers and directors.	BK190	0.50	537.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/29/25	Todd C. Meyers	Exchanges with Jeff Waxman regarding plan classification and release issues (.2); exchange with Jenn Kimble regarding treatment of equity in plan (.1); review cash budget and various exchanges with all parties regarding same (.5); email Sameer Alifarag regarding status of Abengoa litigation (.1); call with Dundon regarding wind down budget (.4); call with Jeff Waxman regarding plan objection (.2); additional exchanges with all parties regarding budget and conversion (.3). .	BK190	1.80	2,745.00
01/30/25	Sameer M. Alifarag	Research regarding Abengoa litigation (1.7); email correspondences with T. Meyers and J. Kimble regarding same (.1).	BK190	1.80	1,665.00
01/31/25	Sameer M. Alifarag	Further research regarding and review of Abengoa state court complaints and status of ICC arbitration (.3); email correspondences with T. Meyers regarding same (.1).	BK190	0.40	370.00
<b>Fees for BK190 - Litigation General</b>				<b>18.20</b>	<b>19,025.00</b>

**BK200 - Meetings of Creditors**

01/03/25	Todd C. Meyers	Email Jennifer Kimble regarding summary for committee (.1); review same (.1).	BK200	0.20	305.00
01/03/25	Jennifer B. Kimble	Draft and send update to Committee re: PCL Sale and Plan Term Sheet.	BK200	0.40	430.00
01/03/25	Sameer M. Alifarag	Email correspondences with Committee regarding parent asset sale updates.	BK200	0.10	92.50
01/07/25	Todd C. Meyers	Exchange with Jennifer Kimble regarding committee call.	BK200	0.10	152.50
01/07/25	Jennifer B. Kimble	Email with T. Meyers re: weekly committee call and email with S. Alifarag re: cancelling committee call.	BK200	0.10	107.50
01/07/25	Sameer M. Alifarag	Email correspondences with J. Kimble and T. Meyers regarding meeting cancellation and case update (.1); email correspondences with Committee regarding same (.1).	BK200	0.20	185.00
01/13/25	Jennifer B. Kimble	Email to the Committee re: Statement on PCL and JMD Sales.	BK200	0.10	107.50
01/13/25	Todd C. Meyers	Committee email regarding sale status.	BK200	0.10	152.50
01/14/25	Jennifer B. Kimble	Emails with T. Meyers re: weekly committee call.	BK200	0.10	107.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/14/25	Todd C. Meyers	Exchange with Jenn Kimble regarding committee call.	BK200	0.10	152.50
01/15/25	Sameer M. Alifarag	Email correspondences with Committee and professionals regarding updates in lieu of meeting.	BK200	0.10	92.50
01/15/25	Jennifer B. Kimble	Draft weekly update to Committee (.2); emails with T. Meyers re: weekly committee update (.1).	BK200	0.30	322.50
01/15/25	Todd C. Meyers	Committee email regarding claim and lien review.	BK200	0.10	152.50
01/17/25	Todd C. Meyers	Committee email regarding approval of sales.	BK200	0.10	152.50
01/17/25	Jennifer B. Kimble	Review Committee update re: PCL sale and send comments to S. Alifarag (.1); follow up emails with S. Alifarag re: Committee update (.1).	BK200	0.20	215.00
01/21/25	Jennifer B. Kimble	Emails with T. Meyers and S. Alifarag re: rescheduling weekly committee call.	BK200	0.10	107.50
01/22/25	Sameer M. Alifarag	Email correspondences with Committee regarding bar date reminder and update call rescheduling.	BK200	0.10	92.50
01/22/25	Todd C. Meyers	Committee email regarding status.	BK200	0.10	152.50
01/22/25	Jennifer B. Kimble	Email with T. Meyers re: rescheduled Committee Call (.1); review and revise Committee email (.1); email with S. Alifarag re: comments to Committee email (.1).	BK200	0.30	322.50
01/23/25	Sameer M. Alifarag	Email correspondences with J. Kimble and committee members regarding scheduling.	BK200	0.10	92.50
01/23/25	Jennifer B. Kimble	Emails with S. Alifarag re: scheduling committee call.	BK200	0.10	107.50
01/25/25	Jennifer B. Kimble	Emails with S. Alifarag re: Committee email re: plan comments.	BK200	0.20	215.00
01/25/25	Todd C. Meyers	Email to committee regarding plan.	BK200	0.10	152.50
01/27/25	Todd C. Meyers	Prepare for committee call (.2); committee call (.5); exchanges with committee regarding plan (.1).	BK200	0.80	1,220.00
01/27/25	Jennifer B. Kimble	Prepare for Committee Call (.2); call with Committee re: plan and comments (.5).	BK200	0.70	752.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/27/25	Sameer M. Alifarag	Dial in to committee update call.	BK200	0.50	462.50
01/31/25	Jennifer B. Kimble	Review update to committee re: plan negotiations.	BK200	0.10	107.50
01/31/25	Todd C. Meyers	Committee emails regarding settlement.	BK200	0.20	305.00
01/31/25	Sameer M. Alifarag	Email correspondence to the Committee regarding plan negotiations.	BK200	0.20	185.00
<b>Fees for BK200 - Meetings of Creditors</b>				<b>5.90</b>	<b>7,002.50</b>

**BK210 - Plan and Disclosure Statement**

01/02/25	Jennifer B. Kimble	Emails with T. Meyers re: comments to plan term sheet (.4); review and revise sale and plan term sheets to incorporate UCC comments (1.0); calls with T. Meyers re: Plan Term Sheet (.5); email with MNAT and parties re: revised Plan Term Sheet (.1); review MNAT revisions to plan term sheet (.2).	BK210	2.20	2,365.00
01/02/25	Sameer M. Alifarag	Review of exclusivity extension order.	BK210	0.10	92.50
01/03/25	Jennifer B. Kimble	Review MNAT revisions to plan term sheet (.3); call with Katten, Kramer and MNAT re: plan term sheet (.6); review further revisions to Plan Term Sheet to address guaranty claims (.2); emails with C. Carlisle re: further revision to plan term sheet (.2); review sample plans circulated by C. Miller re: consolidated trust and treatment (.3); final review of term sheet prior to filing (.1)	BK210	1.70	1,827.50
01/06/25	Sameer M. Alifarag	Review of plan term sheet.	BK210	0.20	185.00
01/06/25	Jennifer B. Kimble	Draft statement regarding PCL sale and plan term sheet.	BK210	1.00	1,075.00
01/09/25	Todd C. Meyers	Call with Curtis Miller regarding plan timeline and related issues.	BK210	0.30	457.50
01/09/25	Jennifer B. Kimble	Email with T. Meyers re: update on timing of plan filing.	BK210	0.10	107.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/10/25	Jennifer B. Kimble	Email with C. Carlisle re: draft plan documents (.1); emails with T. Meyers re: draft disclosure statement and plan (.2); begin reviewing draft Disclosure Statement (1.5).	BK210	1.80	1,935.00
01/10/25	Todd C. Meyers	Exchanges with Curtis Miller regarding plan timeline and hearing dates (.2); review email regarding plan and disclosure statement (.1); exchange with Jennifer Kimble regarding review of same (.1).	BK210	0.40	610.00
01/13/25	Jennifer B. Kimble	Continue reviewing disclosure statement and plan.	BK210	1.30	1,397.50
01/14/25	Todd C. Meyers	Exchange with Curtis Miller regarding plan and DS hearing dates.	BK210	0.10	152.50
01/14/25	Jennifer B. Kimble	Continuing reviewing and revising Disclosure Statement (4.8); begin reviewing plan and making revisions (1.0).	BK210	5.80	6,235.00
01/15/25	Sameer M. Alifarag	Review chapter 11 plan.	BK210	1.60	1,480.00
01/15/25	Jennifer B. Kimble	Emails with J. Waxman and Dundon team re: draft plan (.2); continue reviewing and revising Plan (2.3); make additional revisions to disclosure statement (1.1); email and call with T. Meyers re: revisions to Disclosure Statement and Plan (.3).	BK210	3.90	4,192.50
01/15/25	Todd C. Meyers	Conference with Jenn Kimble regarding plan and exchange with Dundon regarding same.	BK210	0.20	305.00
01/16/25	Sameer M. Alifarag	Continued review of draft chapter 11 plan (.5); review of draft disclosure statement (1.0); email correspondences with T. Meyers and J. Kimble regarding comments to plan and disclosure statement (.1).	BK210	1.60	1,480.00
01/16/25	Jennifer B. Kimble	Further revisions to plan documents (.4); review email from S. Alifarag re: additional plan comments (.2).	BK210	0.60	645.00
01/17/25	Jennifer B. Kimble	Follow up email with T. Meyers re: draft plan documents.	BK210	0.10	107.50
01/21/25	Jennifer B. Kimble	Emails with T. Meyers re: plan discussion.	BK210	0.10	107.50
01/22/25	Jennifer B. Kimble	Emails with T. Meyers re: draft plan.	BK210	0.20	215.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/23/25	Todd C. Meyers	Review plan and disclosure statement and revise and edit and exchanges with Jenn Kimble regarding same (5.2); exchange with Curtis Miller regarding confirmation hearing (.1).	BK210	5.30	8,082.50
01/23/25	Jennifer B. Kimble	Emails with T. Meyers re: plan questions re: claim classification and confirmation hearing scheduling.	BK210	0.30	322.50
01/24/25	Sameer M. Alifarag	Research regarding plan language in connection with releases of directors and officers, document control provisions, conditions precedent (.5); email correspondences with J. Kimble regarding same (.2); draft committee support language (.2); review and comment on updated disclosure statement (.7).	BK210	1.60	1,480.00
01/24/25	Jennifer B. Kimble	Calls with T. Meyers re: Fulcrum Plan and Disclosure Statement revisions (2.2); edit disclosure statement to incorporate T. Meyers comments and further revisions (3.5); edit plan to incorporate further comments and revisions (2.0); emails with J. Waxman re: Horan position on third party releases (.3); email with S. Alifarag re: Plan language (.4).	BK210	8.40	9,030.00
01/24/25	Todd C. Meyers	Review Jenn Kimble's comments to plan and DS (1.0); lengthy call with Jenn Kimble to review all changes (2.2); review preference analysis to determine plan treatment (.2); additional exchange with Jenn Kimble regarding plan status (.1).	BK210	3.50	5,337.50
01/25/25	Sameer M. Alifarag	Email correspondences with T. Meyers and J. Kimble regarding plan and disclosure statement comments (.1); review of same (.2); draft email correspondences to the Committee regarding the same (.2).	BK210	0.50	462.50
01/25/25	Jennifer B. Kimble	Incorporate further edits from T. Meyers into Plan and Disclosure Statement (2.6); emails with T. Meyers re: revised plan documents (.3); email with MNAT Team re: revised plan and disclosure statement (.1).	BK210	3.00	3,225.00
01/25/25	Todd C. Meyers	Work on plan and DS and exchanges with Jenn Kimble regarding same.	BK210	2.20	3,355.00
01/26/25	Jennifer B. Kimble	Review emails re: plan language and confirm that all requested revisions are incorporated.	BK210	0.50	537.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/27/25	Sameer M. Alifarag	Review of motion to retain Verita as solicitation agent and email correspondences with T. Meyers and J. Kimble regarding same.	BK210	0.10	92.50
01/27/25	Jennifer B. Kimble	Follow up correspondence with MNAT re: plan comments (.2); review DIP Budget (.1); emails with T. Meyers and Dundon Team re: Biofuels cash position (.3); calls with T. Meyers re: plan guaranteed fund amount and wind down budget (.3); calls with J. Waxman re: plan comments (.3); emails with T. Meyers re: officer positions and compensation (.2).	BK210	1.40	1,505.00
01/27/25	Todd C. Meyers	Analyze plan set aside and email Dundon regarding same (.3); call with Curtis Miller regarding wind down budget (.2); calls with Jenn Kimble and Josh Nahas regarding same (.4); exchanges with Jenn Kimble regarding plan and DS (.2).	BK210	1.10	1,677.50
01/28/25	Sameer M. Alifarag	Call with J. Kimble regarding open plan items and Debtor response to plan comments.	BK210	0.10	92.50
01/28/25	Jennifer B. Kimble	Follow up with MNAT re: plan status (.2); calls with T. Meyers re: plan comments and Debtors' position on various Committee plan comments (.5); emails with J. Waxman re: open plan research questions (.2); call with S. Alifarag re: plan comments (.2).	BK210	1.10	1,182.50
01/28/25	Todd C. Meyers	Email Clint Carlyle regarding plan status (.1); call with Curtis Miller regarding plan and cash issues (.4); call with Jenn Kimble regarding same (.2).	BK210	0.70	1,067.50
01/29/25	Sameer M. Alifarag	Email correspondences with T. Meyers, J. Kimble and local counsel regarding release and classification issues and timeline of plan (.2); Call with T. Meyers, J. Kimble and M. Dundon regarding viability of plan (.5).	BK210	0.70	647.50
01/29/25	Jennifer B. Kimble	Emails with T. Meyers and J. Waxman re: research on releases (.3); email with S. Alifarag re: review of relevant case law (.1); emails with T. Meyers re: plan opt out language (.2); review and analyze wind down budget (.5); emails with T. Meyers and Dundon team re: wind down budget (.2); call with M. Dundon and T. Meyers re: wind down budget and next steps (.6); emails with S. Alifarag and C. Carlisle re: revised plan documents (.2).	BK210	2.10	2,257.50



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
01/30/25	Jennifer B. Kimble	Review emails re: wind down budget (.2); call with Committee and Debtor professionals re: wind down budget and alternatives re: cash expenditure (.6).	BK210	0.80	860.00
01/30/25	Todd C. Meyers	Exchange with Curtis Miller regarding wind down issues (.1); exchange with Josh Nahas regarding same (.1); analyze revised budget (.3); call with Josh Nahas regarding same (.2); all hands call with debtor professionals regarding same (.6); email exchange with Dundon regarding same (.1); exchanges with Curtis Miller regarding hearing dates (.1); call with Dundon and Jeff Waxman regarding possible counteroffer (.5); email with Curtis Miller regarding employee question (.1); exchange with Sameer Alifarag regarding status of litigation to determine plan cash needs (.2).	BK210	2.30	3,507.50
01/31/25	Jennifer B. Kimble	Emails with T. Meyers and S. Alifarag re: plan negotiations and settlement of open issues.	BK210	0.20	215.00
01/31/25	Todd C. Meyers	Call with Curtis miller regarding settlement (.3); email exchanges with Dundon and Jenn Kimble regarding same (.2); exchange with Sameer Alifarag regarding litigation status (.1).	BK210	0.60	915.00
<b>Fees for BK210 - Plan and Disclosure Statement</b>				<b>59.80</b>	<b>70,825.00</b>
Total Hours/Fees				153.10	<u>\$178,926.50</u>

**SUMMARY OF LEGAL SERVICES**

<b>TIMEKEEPER</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Todd C. Meyers	37.80	1,525.00	57,645.00
Jennifer B. Kimble	70.10	1,075.00	75,357.50
Rebecca A. Gelfand	24.20	1,095.00	26,499.00
Sameer M. Alifarag	21.00	925.00	19,425.00
	<u>153.10</u>		<u>178,926.50</u>

**DISBURSEMENTS**

Relativity Hosting	21.24
Relativity User Fees	170.00

**Total Current Disbursements** **\$191.24**

**TOTAL CURRENT BILLING** **\$179,117.74**

EVERSHEDS  
SUTHERLAND

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Atlanta, GA 30309-3996

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eversheds-sutherland.com

IRS Employer ID No: 58-0619407

**Electronic Remittance Instructions:**

Bank Name: Wells Fargo Bank, N.A.  
Acct Name: Eversheds Sutherland (US) LLP  
Acct Number: [REDACTED]  
Wire Routing/ABA: [REDACTED]  
ACH Routing: [REDACTED]  
SWIFT Code: [REDACTED]

**Check Remittance Instructions:**

Eversheds Sutherland (US) LLP  
PO Box 931885  
Atlanta, GA 31193-1885

**Fulcrum Official Committee  
c/o Luke Murley  
1201 North Market Street, Suite 2300  
Wilmington, DE 19801**

Bill No. 1336253  
Bill Date March 14, 2025

**Matter No: 98061.0001  
RE: Fulcrum**

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**FOR LEGAL SERVICES RENDERED THROUGH February 28, 2025**

<b>Fees</b>	<b>\$56,915.50</b>
<b>Total Current Disbursements</b>	<b>\$181.16</b>
<b>Total Current Bill</b>	<b>\$57,096.66</b>

**FOR LEGAL SERVICES RENDERED THROUGH February 28, 2025****FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK110 - Asset Disposition</b>					
02/01/25	Todd C. Meyers	Review rejection motion.	BK110	0.10	152.50
02/03/25	Todd C. Meyers	Emails regarding Catalyst closing.	BK110	0.10	152.50
02/05/25	Sameer M. Alifarag	Review of second supplemental cure notice.	BK110	0.10	92.50
02/06/25	Todd C. Meyers	Review supplement regarding executors contract assumption.	BK110	0.10	152.50
02/14/25	Jennifer B. Kimble	Review information about warehouse lease rejection (.1); emails with S. Alifarag and T. Meyers re: warehouse lease rejection and deposit (.1).	BK110	0.20	215.00
02/14/25	Todd C. Meyers	Exchange regarding return of lease deposit.	BK110	0.10	152.50
02/14/25	Sameer M. Alifarag	Review motion to reject warehouse lease (.1); email correspondences with T. Meyers, J. Kimble and debtors' counsel regarding same (.1).	BK110	0.20	185.00
02/18/25	Sameer M. Alifarag	Review of second supplemental cure notice.	BK110	0.10	92.50
02/18/25	Jennifer B. Kimble	Email with S. Alifarag re: Second Supplemental Cure Notice.	BK110	0.10	107.50
02/19/25	Jennifer B. Kimble	Review voice mail from C. Miller re: sale questions (.1); call with C. Miller re: insurance receivable and motion to abandon (.2); review and analyze PCL Sale Agreement re: acquired assets (.5); review motion to abandon equity interest (.2); follow up emails with T. Meyers re: insurance receivable (.2).	BK110	1.20	1,290.00
02/20/25	Jennifer B. Kimble	Emails with T. Meyers and C. Miller re: insurance refund.	BK110	0.20	215.00
02/20/25	Todd C. Meyers	Exchanges with Becky Gelfand and Jenn Kimble regarding insurance refund.	BK110	0.20	305.00
02/21/25	Jennifer B. Kimble	Emails with B. Gelfand and T. Meyers re: insurance receivable check and open issues re: effect of sale to PCL.	BK110	0.40	430.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
02/24/25	Jennifer B. Kimble	Review cover letter and offer to purchase equity forwarded by C. Miller (MNAT) (.2); call with T. Meyers re: equity purchase offer (.1).	BK110	0.30	322.50
02/24/25	Todd C. Meyers	Call with Curtis miller regarding possible equity sale (.3); conference with Jenn Kimble regarding same (.2); review proposal regarding same (.3).	BK110	0.80	1,220.00
02/25/25	Jennifer B. Kimble	Emails with T. Meyers and B. Gelfand re: insurance check and lien review (.2); follow up review re: equity purchase offer (.1).	BK110	0.30	322.50
02/25/25	Todd C. Meyers	Exchange with Becky Gelfand regarding insurance refund.	BK110	0.10	152.50
02/26/25	Jennifer B. Kimble	Email with T. Meyers re: PCL sale and insurance proceeds.	BK110	0.10	107.50
02/26/25	Todd C. Meyers	Exchanges regarding insurance refund.	BK110	0.20	305.00
02/27/25	Jennifer B. Kimble	Emails with T. Meyers and B. Gelfand re: insurance receivable (.2); review memo from B. Gelfand re: insurance receivable (.2); email with C. Miller (MNAT) re: Committee conclusion on Insurance Check (worker comp refund) (.1).	BK110	0.50	537.50
02/27/25	Todd C. Meyers	Review parent APA and exchange with Becky Gelfand regarding refund issue.	BK110	0.30	457.50
02/28/25	Jennifer B. Kimble	Email with C. Miller re: status of purchase offer Debtors received for equity interest .	BK110	0.10	107.50
<b>Fees for BK110 - Asset Disposition</b>				<b>5.80</b>	<b>7,075.00</b>

**BK130 - Case Administration and Analysis**

02/10/25	Sameer M. Alifarag	Call with J. Kimble regarding general case updates.	BK130	0.10	92.50
02/19/25	Todd C. Meyers	Review abandonment motion and email regarding same.	BK130	0.20	305.00
02/24/25	Sameer M. Alifarag	Review of January monthly operating reports.	BK130	0.20	185.00
02/28/25	Todd C. Meyers	Various exchanges regarding abandonment motion and calls regarding same.	BK130	0.50	762.50
02/28/25	Sameer M. Alifarag	Review of motion to abandon equity interests (.2); email correspondences with T. Meyers and J. Kimble regarding same (.1).	BK130	0.30	277.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>Fees for BK130 - Case Administration and Analysis</b>				<b>1.30</b>	<b>1,622.50</b>
<b>BK141 - Lien Investigation</b>					
02/17/25	Todd C. Meyers	Review email to Curtis Miller regarding CD.	BK141	0.10	152.50
02/20/25	Rebecca A. Gelfand	Analyze issues relating to insurance proceeds.	BK141	0.60	657.00
02/26/25	Eric Fenichel	Advise on security interest in insurance proceeds.	BK141	0.20	280.00
02/26/25	Rebecca A. Gelfand	Analyze issues relating to insurance proceeds.	BK141	2.50	2,737.50
02/27/25	Todd C. Meyers	Email regarding waste management bond.	BK141	0.10	152.50
02/27/25	Rebecca A. Gelfand	Analyze UCC issues relating to insurance receivables.	BK141	0.30	328.50
<b>Fees for BK141 - Lien Investigation</b>				<b>3.80</b>	<b>4,308.00</b>
<b>BK160 - Fee/Employment Applications</b>					
02/02/25	Sameer M. Alifarag	Review of interim compensation order and email correspondences with T. Meyers regarding combined monthly fee application.	BK160	0.10	92.50
02/10/25	Jennifer B. Kimble	Call with S. Alifarag re: January bill and combined December/ January monthly fee statement.	BK160	0.10	107.50
02/12/25	Jennifer B. Kimble	Emails with T. Meyers and S. Alifarag re: December/ January monthly fee statement (.1); email with S. Alifarag re: MNAT Fee Application (.1).	BK160	0.20	215.00
02/18/25	Sameer M. Alifarag	Draft combined fee application (1.1); email correspondences with J. Kimble regarding same (.1).	BK160	1.20	1,110.00
02/19/25	Todd C. Meyers	Review fee application and exchanges regarding same.	BK160	0.30	457.50
02/19/25	Sameer M. Alifarag	Email correspondences with T. Meyers, J. Kimble, and committee professionals regarding combined fee application draft (.1); further revisions to same (.1).	BK160	0.20	185.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
02/19/25	Jennifer B. Kimble	Review and revise Combined Eversheds Monthly Fee statement for December and January (.2); emails with T. Meyers re: Third Combined Monthly Fee statement (.1); emails with T. Meyers and C. Rudloff re: information for Supplemental Meyers Disclosure (.2); draft Second Supplemental Meyers Disclosure (.3).	BK160	0.80	860.00
02/20/25	Sameer M. Alifarag	Email correspondences with T. Meyers and J. Kimble regarding updates to fee application.	BK160	0.10	92.50
02/20/25	Jennifer B. Kimble	Email with S. Alifarag re: circulating UCC professional fee apps to committee (.1); revise T. Meyers Declaration (.2); email with T. Meyers re: Declaration (.1); email with C. Donnelly re: filing Meyers Declaration (.1).	BK160	0.50	537.50
02/20/25	Todd C. Meyers	Review revised fee application (.1); review supplement to retention (.1).	BK160	0.20	305.00
02/21/25	Jennifer B. Kimble	Email with S. Alifarag re: Dundon Fee Application (.1); review revised Dundon Fee Application (.2).	BK160	0.30	322.50
02/21/25	Sameer M. Alifarag	Revisions to Eversheds fee application (.1); review of and revisions to draft Dundon fee application (.5); email correspondences with J. Kimble, Dundon team, and Committee regarding same (.2).	BK160	0.80	740.00
02/24/25	Jennifer B. Kimble	Emails with J. Waxman re: Committee fee applications.	BK160	0.10	107.50
02/25/25	Jennifer B. Kimble	Email with Morris James re: Eversheds LEDES files for December/ January Fee statement.	BK160	0.10	107.50
<b>Fees for BK160 - Fee/Employment Applications</b>				<b>5.00</b>	<b>5,240.00</b>
<b>BK170 - Fee/Employment Objections</b>					
02/04/25	Sameer M. Alifarag	Review DSI fourth monthly fee application.	BK170	0.10	92.50
02/12/25	Sameer M. Alifarag	Review of MNAT fourth monthly fee application (.1); email correspondences with T. Meyers and J. Kimble regarding same (.1).	BK170	0.20	185.00
<b>Fees for BK170 - Fee/Employment Objections</b>				<b>0.30</b>	<b>277.50</b>

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK180 - Financing</b>					
02/09/25	Todd C. Meyers	Exchange with Jenn Kimble regarding challenge period.	BK180	0.10	152.50
02/09/25	Jennifer B. Kimble	Email with T. Meyers re: expiration of challenge period.	BK180	0.10	107.50
02/14/25	Todd C. Meyers	Exchange regarding extension on challenge period.	BK180	0.10	152.50
02/17/25	Sameer M. Alifarag	Email correspondences with J. Kimble and UMB Counsel regarding extension of CD challenge period.	BK180	0.10	92.50
02/17/25	Jennifer B. Kimble	Emails with C. Miller re: release of Nevada Department of Conservation letter of credit and related CD (.2); emails with D. Buckley re: further extension of CD challenge deadline (.1).	BK180	0.30	322.50
02/18/25	Todd C. Meyers	Kramer email regarding challenge extension.	BK180	0.10	152.50
02/20/25	Jennifer B. Kimble	Email with C. Miller re: status of release of letter of credit with NV Dept. of Conservation and related CD.	BK180	0.10	107.50
02/25/25	Jennifer B. Kimble	Review lien challenge deadline and follow up with status of release of letter of credit.	BK180	0.10	107.50
02/27/25	Jennifer B. Kimble	Follow up email with C. Curtis re: release of Nevada Dept. of Conservation letter of credit and related CD.	BK180	0.10	107.50
<b>Fees for BK180 - Financing</b>				<b>1.10</b>	<b>1,302.50</b>
<b>BK200 - Meetings of Creditors</b>					
02/02/25	Todd C. Meyers	Committee email regarding status.	BK200	0.10	152.50
02/03/25	Todd C. Meyers	Various emails with committee regarding status of plan settlement.	BK200	0.30	457.50
02/04/25	Sameer M. Alifarag	Draft January 27, 2025 committee meeting minutes.	BK200	0.30	277.50
02/05/25	Jennifer B. Kimble	Weekly Committee call to discuss plan settlement (.3); prepare for same (.2).	BK200	0.50	537.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
02/05/25	Sameer M. Alifarag	Draft committee meeting agenda (.1); email correspondences with T. Meyers regarding same (.1); email correspondences with Committee regarding agenda and documents in connection with February 5 meeting (.1); dial in to committee update call (.3).	BK200	0.60	555.00
02/05/25	Todd C. Meyers	Exchanges with Dundon regarding chart for committee call and review same (.3); review and revise call agenda and with Sameer Alifarag regarding same (.2); prepare for committee call (.3); committee call (.3).	BK200	1.10	1,677.50
02/11/25	Sameer M. Alifarag	Draft February 5 committee meeting minutes.	BK200	0.20	185.00
02/11/25	Jennifer B. Kimble	Review and respond to committee member inquiry re: confirmation process.	BK200	0.20	215.00
02/17/25	Todd C. Meyers	Email to Jenn Kimble regarding committee call.	BK200	0.10	152.50
02/17/25	Jennifer B. Kimble	Email with T. Meyers and S. Alifarag re: weekly committee call.	BK200	0.10	107.50
02/21/25	Jennifer B. Kimble	Review draft email to committee and email with S. Alifarag re: the same.	BK200	0.10	107.50
02/21/25	Todd C. Meyers	Email to committee.	BK200	0.10	152.50
<b>Fees for BK200 - Meetings of Creditors</b>				<b>3.70</b>	<b>4,577.50</b>

**BK210 - Plan and Disclosure Statement**

02/01/25	Todd C. Meyers	Call with Curtis Miller regarding plan settlement (.2); review revised budget (.2); exchanges with Dundon regarding same (.2).	BK210	0.60	915.00
02/02/25	Sameer M. Alifarag	Review of committee proposal to wind down budget.	BK210	0.10	92.50
02/02/25	Todd C. Meyers	Analyze counter proposal and emails regarding same (.5); call with Curtis Miller regarding same (.2); work on revised plan and disclosure statement and email comments to same (1.8).	BK210	2.50	3,812.50
02/03/25	Todd C. Meyers	Exchange with Curtis Miller regarding plan settlement (.3); review revised plan and DS and exchanges regarding same (.8); email Clint Carlisle regarding plan filing (.1).	BK210	1.20	1,830.00



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
02/03/25	Jennifer B. Kimble	Review emails from C. Miller re: plan comments (.2); review revised plan language resolving issues raised by UCC (1.0).	BK210	1.20	1,290.00
02/04/25	Jennifer B. Kimble	Review emails from MNAT re: shortening notice of hearing and objection deadline (.2); review updated wind down budget information (.2); emails with T. Meyers and MNAT team re: resolution of Committee objections to plan (.5).	BK210	0.90	967.50
02/04/25	Todd C. Meyers	Curtis Miller email regarding motion to shorten (.1); review same (.1).	BK210	0.20	305.00
02/04/25	Sameer M. Alifarag	Research regarding viability of insider releases (2.0); review of order shortening notice and notice of hearing regarding disclosure statement (.1).	BK210	2.10	1,942.50
02/05/25	Sameer M. Alifarag	Review of redlines to chapter 11 plan and disclosure statement (.7); review of wind-down budget comparison (.1).	BK210	0.80	740.00
02/05/25	Jennifer B. Kimble	Emails with T. Meyers and S. Alifarag re: plan settlement and revised plan language (.5); review Dundon analysis of wind down budget (.3); review updated Plan language (.4).	BK210	1.20	1,290.00
02/06/25	Jennifer B. Kimble	Emails with T. Meyers and S. Alifarag re: convertible notes and insiders.	BK210	0.20	215.00
02/07/25	Jennifer B. Kimble	Review additional language for plan revisions (.3); email with T. Meyers re: revised language (.1).	BK210	0.40	430.00
02/10/25	Jennifer B. Kimble	Review filed version of revised combined plan and disclosure statement (.5); review emails re: committee settlement and next steps (.2).	BK210	0.70	752.50
02/13/25	Sameer M. Alifarag	Review draft solicitation procedures motion and comments to same (2.1); email correspondences with T. Meyers, J. Kimble, and debtors' counsel regarding same (.1).	BK210	2.20	2,035.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
02/13/25	Jennifer B. Kimble	Email with MNAT re: Solicitation Motion (.1); review and revise Solicitation Motion (1.2); review and revise draft ballots (.5); review redline plan and disclosure statement comments to determine whether Committee's release language comments were incorporated (.5); review and revise Notice of Non-Voting Status (.5); review and revise Confirmation Hearing Notice (.3); review and revise proposed Solicitation Order (.7); emails with T. Meyers re: comments and revisions to Solicitation Motion, Order and related documents (.2); emails with T. Meyers and S. Alifarag re: "released parties" definition (.2); email with MNAT re: proposed revisions to solicitation motion (.1).	BK210	4.30	4,622.50
02/13/25	Todd C. Meyers	Review solicitation materials and various exchanges regarding comments to same.	BK210	0.60	915.00
02/14/25	Todd C. Meyers	Exchange regarding solicitation procedure changes.	BK210	0.10	152.50
02/14/25	Sameer M. Alifarag	Email correspondences with J. Kimble and debtors' counsel regarding plan comments and release issues (.1); review of updates solicitation procedures motion (.5).	BK210	0.60	555.00
02/14/25	Jennifer B. Kimble	Review email from C. Miller (.1); review proposed language from S. Alifarag (.1); email with C. Miller re: revised language for definition of Released Parties (.1); call with C. Carlisle re: Released Parties comments (.1); review revised Solicitation Motion (.6); further revisions to Solicitation Motion and Order (1.4); emails with T. Meyers re: proposed solicitation document revisions (.2).	BK210	2.60	2,795.00
02/15/25	Jennifer B. Kimble	Review redline comments to Solicitation Motion (.2); additional revisions to solicitation documents (.5); email with MNAT team re: additional revisions to Solicitation documents (.1).	BK210	0.80	860.00
02/15/25	Todd C. Meyers	Review revised procedures and exchanges regarding same (.2); review further revised procedures and exchange with Jenn Kimble regarding same (.2); Kramer Levin email regarding same (.1).	BK210	0.50	762.50
02/16/25	Jennifer B. Kimble	Review Kramer comments to solicitation documents.	BK210	0.20	215.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
02/17/25	Jennifer B. Kimble	Email with C. Carlisle re: solicitation motion.	BK210	0.10	107.50
02/19/25	Todd C. Meyers	Voicemail from Curtis Miller regarding status and exchange with Jenn Kimble regarding same.	BK210	0.10	152.50
02/20/25	Todd C. Meyers	Exchange with Curtis Miller regarding status.	BK210	0.10	152.50
02/27/25	Jennifer B. Kimble	Review email from MNAT re: UST comments to plan (.2); review plan and work through Debtors' proposed responses to UST (.6); emails with T. Meyers and S. Alifarag re: MNAT plan responses (.2).	BK210	1.00	1,075.00
02/27/25	Todd C. Meyers	Review UST DS comments and debtor responses (.3); email regarding TRI motion (.1); review UST email (.1).	BK210	0.50	762.50
02/27/25	Sameer M. Alifarag	Email correspondences with debtors' counsel, UMB counsel, and Eversheds team regarding proposed responses to US Trustee plan comments (.2); review of plan in connection with same (.2).	BK210	0.40	370.00
02/28/25	Sameer M. Alifarag	Internal email correspondences with Eversheds team regarding disclosure statement hearing logistics (.1); email correspondences with debtors' counsel and UMB counsel regarding comments to proposed UST correspondence (.1).	BK210	0.20	185.00
02/28/25	Jennifer B. Kimble	Emails with T. Meyers re: plan comments and Solicitation Motion (.3); emails with MNAT re: plan comments and response to UST (.2); emails with T. Meyers and S. Alifarag re: disclosure statement hearing (.1); email with T. Meyers re: liquidating trust (.1).	BK210	0.70	752.50
02/28/25	Todd C. Meyers	Exchange with Curtis Miller regarding UST DS issues (.1); exchange with team regarding hearing coverage (.1).	BK210	0.20	305.00
<b>Fees for BK210 - Plan and Disclosure Statement</b>				<b>27.30</b>	<b>31,357.50</b>

**BK220 - Relief from Stay Proceedings**

02/27/25	Jennifer B. Kimble	Email with S. Alifarag re: TRI Motion for Relief from Stay.	BK220	0.10	107.50
02/28/25	Sameer M. Alifarag	Review of Thermochem stay relief motion and attached exhibits (.7); email correspondences with T. Meyers and J. Kimble regarding same (.2).	BK220	0.90	832.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
02/28/25	Jennifer B. Kimble	Review summary of TRI Stay Relief Motion and follow up correspondence with S. Alifarag re: the same.	BK220	0.20	215.00
<b>Fees for BK220 - Relief from Stay Proceedings</b>				<b>1.20</b>	<b>1,155.00</b>
Total Hours/Fees				49.50	<u>\$56,915.50</u>

**SUMMARY OF LEGAL SERVICES**

<b>TIMEKEEPER</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Todd C. Meyers	12.00	1,525.00	18,300.00
Eric Fenichel	0.20	1,400.00	280.00
Jennifer B. Kimble	21.70	1,075.00	23,327.50
Rebecca A. Gelfand	3.40	1,095.00	3,723.00
Sameer M. Alifarag	12.20	925.00	11,285.00
	<u>49.50</u>		<u>56,915.50</u>

**DISBURSEMENTS**

Relativity Hosting	11.16
Relativity User Fees	170.00

**Total Current Disbursements** **\$181.16**

**TOTAL CURRENT BILLING** **\$57,096.66**

EVERSHEDS  
SUTHERLAND

**Eversheds Sutherland (US) LLP**

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Atlanta, GA 30309-3996

T: +1 404 853 8000

eversheds-sutherland.com

IRS Employer ID No: 58-0619407

**Electronic Remittance Instructions:**

Bank Name: Wells Fargo Bank, N.A.  
Acct Name: Eversheds Sutherland (US) LLP  
Acct Number: [REDACTED]  
Wire Routing/ABA: [REDACTED]  
ACH Routing: [REDACTED]  
SWIFT Code: [REDACTED]

**Check Remittance Instructions:**

Eversheds Sutherland (US) LLP  
PO Box 931885  
Atlanta, GA 31193-1885

**Fulcrum Official Committee  
c/o Luke Murley  
1201 North Market Street, Suite 2300  
Wilmington, DE 19801**

Bill No. 1339405  
Bill Date April 8, 2025

**Matter No: 98061.0001  
RE: Fulcrum**

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**FOR LEGAL SERVICES RENDERED THROUGH March 31, 2025**

<b>Fees</b>	<b>\$115,472.50</b>
<b>Total Current Disbursements</b>	<b>\$4,620.57</b>
<b>Total Current Bill</b>	<b>\$120,093.07</b>

**FOR LEGAL SERVICES RENDERED THROUGH March 31, 2025****FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK110 - Asset Disposition</b>					
03/02/25	Jennifer B. Kimble	Email with T. Meyers regarding Sale of Equity.	BK110	0.10	107.50
03/02/25	Todd C. Meyers	Email exchange with Jenn Kimble regarding equity proposal.	BK110	0.10	152.50
03/04/25	Todd C. Meyers	Conference with Jenn Kimble regarding equity sale.	BK110	0.10	152.50
03/04/25	Jennifer B. Kimble	Call with C. Miller regarding update on discussions over sale of equity interest in UK subsidiaries (.2); call with T. Meyers regarding update on PCL issues with potential sale and next steps (.1).	BK110	0.30	322.50
03/06/25	Todd C. Meyers	Review equity proposal and exchange with Curtis Miller regarding same.	BK110	0.10	152.50
03/07/25	Todd C. Meyers	Exchanges regarding equity sale proposal.	BK110	0.20	305.00
03/07/25	Jennifer B. Kimble	Call with C. Miller regarding updates on potential sale of Fulcrum UK entity (.2); correspondence with T. Meyers regarding status of potential offer for Fulcrum UK equity and next steps (.1).	BK110	0.30	322.50
03/10/25	Jennifer B. Kimble	Emails with T. Meyers and S. Alifarag regarding Fulcrum UK equity offer (.2); emails with C. Miller regarding update on potential equity offer and next steps (.2).	BK110	0.40	430.00
03/10/25	Todd C. Meyers	Various exchanges with Curtis Miller regarding equity sale.	BK110	0.30	457.50
03/14/25	Todd C. Meyers	Exchanges with Jenn Kimble and Curtis Miller regarding equity sale and tax issues.	BK110	0.30	457.50
03/14/25	Jennifer B. Kimble	Call with C. Miller regarding update on sale of UK equity (.2); update correspondence to T. Meyers regarding the same (.2); follow up email to C. Miller regarding tax implications of sale (.1).	BK110	0.50	537.50
03/17/25	Frank Comparetto	Attention to inquiries regarding sale vs abandonment tax treatment.	BK110	0.20	220.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/17/25	Jennifer B. Kimble	Review emails from T. Meyers and tax group regarding UK equity sale and potential tax issues related to the same (.2); circulate information regarding Fulcrum Bioenergy Ltd to address certain open tax questions (.2).	BK110	0.40	430.00
03/17/25	Todd C. Meyers	Email tax partner regarding foreign stock transaction (.1); exchanges with Curtis Miller regarding tax issues (.2).	BK110	0.30	457.50
03/18/25	Rob Ellis	Review purchase agreement for UK subsidiary.	BK110	1.60	1,920.00
03/18/25	Jennifer B. Kimble	Emails with T. Meyers regarding Stock Purchase Agreement (.2); email with R. Ellis regarding review of stock purchase agreement and concerns (.2).	BK110	0.40	430.00
03/18/25	Todd C. Meyers	Exchanges regarding SPA and tax issues (.2); additional exchange with Jenn Kimble regarding SPA (.1).	BK110	0.30	457.50
03/19/25	Rob Ellis	Review and draft comments to purchase agreement for foreign subsidiary sale.	BK110	1.50	1,800.00
03/19/25	Todd C. Meyers	Exchanges regarding SPA and tax issues (.2); review SPA and exchanges regarding same (.5); review Rob Ellis comments to same (.2).	BK110	0.90	1,372.50
03/19/25	Jennifer B. Kimble	Follow up with R. Ellis regarding revised draft of stock purchase agreement (.2); review revised purchase agreement (.2); emails with T. Meyers, R. Chase, and C. Carlisle regarding sale and tax issues (.1).	BK110	0.50	537.50
03/20/25	Todd C. Meyers	Exchanges with Rob Ellis and Jenn Kimble regarding SPA (.2); review revisions to same (.2); exchanges with MNAT regarding same (.1); Robb Chase email regarding SPA tax treatment (.1).	BK110	0.60	915.00
03/20/25	Robert S. Chase	Attention to tax questions regarding subsidiary sale transaction and review of sale agreement.	BK110	0.60	930.00
03/20/25	Jennifer B. Kimble	Review emails from T. Meyers and R. Ellis regarding UK equity sale (.2); review proposed revisions to stock purchase agreement (.2); draft and send email to MNAT with comments to stock purchase agreement (.3); emails with T. Meyers and R. Chase regarding tax issues related to sale (.2).	BK110	0.90	967.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/21/25	Rob Ellis	Review comments to SPA.	BK110	0.40	480.00
03/21/25	Jennifer B. Kimble	Emails with T. Meyers and R. Ellis regarding revised Stock Purchase Agreement and redline of the same (.2); review emails from C. Carlisle regarding revised Stock Purchase Agreement and Sale Order (.2); emails with C. Carlisle signing off on SPA and draft sale order (.1); begin reviewing proposed sale order (.8).	BK110	1.30	1,397.50
03/21/25	Todd C. Meyers	Email regarding revised SPA (.1); email Rob Ellis regarding same (.1); review revised SPA and emails regarding same (.3); exchange with Jenn Kimble regarding same (.1).	BK110	0.60	915.00
03/24/25	Jennifer B. Kimble	Continue marking up Fulcrum Ltd. (UK) proposed Sale Order (1.0); emails with C. Carlisle regarding status of UK equity sale and updates (.2); draft and send email to C. Wills (London) regarding assistance with Fulcrum UK equity sale (.3); email with T. Meyers regarding proposed revisions to UK equity sale order (.1); call with C. Carlisle and email with T. Meyers and R. Ellis regarding SPA release language (.2); emails with T. Meyers and S. Alifrag regarding SPA expense reimbursement language and provision application (.1); email with M. Hanamirian (Saul Ewing) regarding question regarding stock purchase agreement (.1);.	BK110	2.00	2,150.00
03/25/25	Jennifer B. Kimble	Emails with T. Meyers regarding Fee structure for UK equity sale (.3); emails with T. Meyers regarding UK Equity Sale Order (.2); review and revise Sale Order (.4); emails and call with H. Kaye regarding UK issues related to stock sale and transfer (.4); review information received from H. Kaye and correspond with MNAT regarding the same (.5).	BK110	1.80	1,935.00
03/25/25	Todd C. Meyers	Review SPA order and exchanges with Jenn Kimble regarding same (.3); review SPA and exchanges with debtor regarding same (.3); further exchanges with debtor regarding SPA (.2); review revisions to same (.1); further exchanges and review revisions to SPA and sale order (.4); review motion to shorten (.1).	BK110	1.40	2,135.00
03/25/25	Rob Ellis	Review purchase agreement issues.	BK110	0.40	480.00



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/26/25	Jennifer B. Kimble	Emails with T. Meyers regarding UK Sale Order (.2); revise UK Sale Order (.3); emails with J. Kaye regarding UK equity sale details and concerns (.2).	BK110	0.70	752.50
03/26/25	Todd C. Meyers	Review revised order (.1); email from UK colleague regarding SPA issues (.1).	BK110	0.20	305.00
03/31/25	Sameer M. Alifarag	Review of equity sale motion and annexed Stock Purchase Agreement.	BK110	0.50	462.50
<b>Fees for BK110 - Asset Disposition</b>				<b>20.20</b>	<b>24,847.50</b>

**BK130 - Case Administration and Analysis**

03/01/25	Todd C. Meyers	Email regarding abandonment motion.	BK130	0.10	152.50
03/03/25	Jennifer B. Kimble	Review Motion to Abandon and related Order regarding details of proposed abandonment (.2); email with T. Meyers regarding abandonment motion (.1).	BK130	0.30	322.50
03/06/25	Jennifer B. Kimble	Email with J. Waxman regarding 3/10 hearing.	BK130	0.10	107.50
03/07/25	Sameer M. Alifarag	Call with Judge Horan's chambers regarding status of March 10 hearing.	BK130	0.10	92.50
03/10/25	Sameer M. Alifarag	Attend status conference call (.2); email correspondences with T. Meyers and J. Kimble regarding same (.1).	BK130	0.30	277.50
03/14/25	Sameer M. Alifarag	Review of recently filed papers and pleadings.	BK130	0.10	92.50
03/17/25	Sameer M. Alifarag	Review of recently filed papers and pleadings.	BK130	0.10	92.50
03/25/25	Sameer M. Alifarag	Review and analysis of February 2025 monthly operating reports.	BK130	0.30	277.50
<b>Fees for BK130 - Case Administration and Analysis</b>				<b>1.40</b>	<b>1,415.00</b>

**BK140 - Claims Adm. and Objections**

03/12/25	Jennifer B. Kimble	Email with T. Meyers and C. Miller regarding State of Nevada priority claim.	BK140	0.10	107.50
03/26/25	Jennifer B. Kimble	Emails with C. Carlisle and T. Meyers regarding First omnibus claim objection hearing date.	BK140	0.10	107.50
03/26/25	Todd C. Meyers	Exchanges with debtor and Jenn Kimble regarding claims objection.	BK140	0.20	305.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/27/25	Sameer M. Alifarag	Review of first omnibus claim objection.	BK140	0.20	185.00
03/27/25	Jennifer B. Kimble	Review first omnibus claim objection.	BK140	0.20	215.00
03/27/25	Todd C. Meyers	Review Omnibus objection.	BK140	0.10	152.50
03/28/25	Todd C. Meyers	Exchange with Jenn Kimble regarding first omnibus objection.	BK140	0.10	152.50
<b>Fees for BK140 - Claims Adm. and Objections</b>				<b>1.00</b>	<b>1,225.00</b>

**BK141 - Lien Investigation**

03/05/25	Jennifer B. Kimble	Email with D. Buckley regarding further extension of Challenge Period.	BK141	0.10	107.50
03/05/25	Sameer M. Alifarag	Email correspondences with T. Meyers, J. Kimble, and UMB counsel regarding extension of challenge period.	BK141	0.10	92.50
03/28/25	Jennifer B. Kimble	Emails with D. Buckley regarding extension of challenge period.	BK141	0.10	107.50
03/28/25	Sameer M. Alifarag	Email correspondences with J. Kimble and UMB counsel regarding challenge period extension.	BK141	0.10	92.50
03/28/25	Todd C. Meyers	Email Curtis Miller regarding L/C status; exchange with Kramer Levin regarding extension.	BK141	0.20	305.00
<b>Fees for BK141 - Lien Investigation</b>				<b>0.60</b>	<b>705.00</b>

**BK160 - Fee/Employment Applications**

03/04/25	Jennifer B. Kimble	Review deadline for CNO on monthly fee applications and email with S. Alifarag regarding the same.	BK160	0.10	107.50
03/10/25	Jennifer B. Kimble	Email with J. Waxman regarding CNO for Eversheds December/ January Fee Statement.	BK160	0.10	107.50
03/11/25	Jennifer B. Kimble	Email with J. Waxman regarding fee application CNOs.	BK160	0.10	107.50
03/13/25	Jennifer B. Kimble	Email with C. Carlisle regarding CNOs for Eversheds and Dundon monthly fee statements and email and call with J. Waxman regarding the same.	BK160	0.10	107.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/14/25	Sameer M. Alifarag	Draft fourth monthly fee application (.8); email correspondences with J. Kimble regarding same (.2).	BK160	1.00	925.00
03/14/25	Jennifer B. Kimble	Review draft revised CNOs prior to filing and email with J. Waxman regarding revised CNOs (.1); emails with S. Alifarag regarding draft February application and error in payment reflected (.1).	BK160	0.20	215.00
03/17/25	Jennifer B. Kimble	Email with S. Alifarag regarding update Fourth Fee Application.	BK160	0.10	107.50
03/18/25	Todd C. Meyers	Revise fee application and exchange with Sameer Alifarag regarding same.	BK160	0.30	457.50
03/18/25	Jennifer B. Kimble	Review and revise Fourth Monthly Fee Statement (.2); review fee information (.1); call with S. Alifarag regarding confirmation of payment amounts (.1).	BK160	0.40	430.00
03/19/25	Sameer M. Alifarag	Email correspondences with local counsel and Dundon team regarding February fee application.	BK160	0.10	92.50
03/19/25	Jennifer B. Kimble	Emails with S. Alifarag regarding Fourth Monthly Fee Statement and interim fee applications.	BK160	0.20	215.00
03/19/25	Todd C. Meyers	Review revised fee application.	BK160	0.10	152.50
03/21/25	Jennifer B. Kimble	Call with J. Waxman regarding Fee Applications.	BK160	0.10	107.50
03/22/25	Sameer M. Alifarag	Review of and comments to Dundon fourth monthly fee application (.4); email correspondences with Dundon team regarding same (.1).	BK160	0.50	462.50
03/26/25	Jennifer B. Kimble	Correspondence with Morris James regarding Eversheds LEDES file for February fee statement.	BK160	0.10	107.50
03/27/25	Jennifer B. Kimble	Email with UST regarding LEDES files.	BK160	0.10	107.50
<b>Fees for BK160 - Fee/Employment Applications</b>				<b>3.60</b>	<b>3,810.00</b>

**BK170 - Fee/Employment Objections**

03/07/25	Jennifer B. Kimble	Review DSI monthly fee application.	BK170	0.20	215.00
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**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/18/25	Sameer M. Alifarag	Further updates to fourth monthly fee application (.4); email correspondences with J. Kimble regarding same (.2).	BK170	0.60	555.00
03/21/25	Sameer M. Alifarag	Review of DSI fifth monthly fee application and email correspondences with T. Meyers and J. Kimble regarding same.	BK170	0.10	92.50
03/24/25	Sameer M. Alifarag	Review Morris Nichols' fifth monthly fee application and correspondences with T. Meyers and J. Kimble regarding same.	BK170	0.10	92.50
<b>Fees for BK170 - Fee/Employment Objections</b>				<b>1.00</b>	<b>955.00</b>
<b>BK180 - Financing</b>					
03/05/25	Jennifer B. Kimble	Follow up with C. Miller on resolution of Nevada Dept. of Conservation LC and CD release.	BK180	0.20	215.00
03/27/25	Jennifer B. Kimble	Email with C. Miller regarding status of LOC release from NV Dept. of Conservation.	BK180	0.10	107.50
03/28/25	Jennifer B. Kimble	Call with C. Miller regarding status of release of NV Dept of Conservation letter of credit (.2); emails with D. Buckley regarding extension of challenge period (.1).	BK180	0.20	215.00
<b>Fees for BK180 - Financing</b>				<b>0.50</b>	<b>537.50</b>
<b>BK190 - Litigation General</b>					
03/31/25	Jennifer B. Kimble	Emails with MNAT and T. Meyers regarding Abengoa litigation and pre-bankruptcy counsel information.	BK190	0.20	215.00
03/31/25	Todd C. Meyers	Exchanges with MNAT regarding Abengoa claims (.1); exchange with Matt Dundon regarding Abengoa contingency counsel (.1).	BK190	0.20	305.00
<b>Fees for BK190 - Litigation General</b>				<b>0.40</b>	<b>520.00</b>
<b>BK200 - Meetings of Creditors</b>					
03/03/25	Todd C. Meyers	Email to committee.	BK200	0.10	152.50
03/04/25	Todd C. Meyers	Committee email.	BK200	0.10	152.50
03/04/25	Jennifer B. Kimble	Review and revise committee email regarding statement in support of disclosure statement (.1); email with S. Alifarag regarding update to Committee (.1).	BK200	0.20	215.00

**FEE DETAIL**

<b><u>Date</u></b>	<b><u>Timekeeper</u></b>	<b><u>Narrative</u></b>	<b><u>Task</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
03/07/25	Sameer M. Alifarag	Email correspondences with Committee and professionals regarding general case updates and scheduling of call.	BK200	0.10	92.50
03/07/25	Todd C. Meyers	Email exchanges with Jenn Kimble and Sameer Alifarag regarding committee email and next call.	BK200	0.10	152.50
03/10/25	Jennifer B. Kimble	Draft proposed email to Committee regarding materials for discussion on 3/13 call (.3); email with T. Meyers regarding Committee update email and revise email (.2).	BK200	0.50	537.50
03/10/25	Todd C. Meyers	Review and revise committee email regarding status.	BK200	0.10	152.50
03/11/25	Todd C. Meyers	Email to committee regarding status.	BK200	0.10	152.50
03/11/25	Sameer M. Alifarag	Email correspondences with Committee regarding agenda items for March 12 meeting.	BK200	0.10	92.50
03/11/25	Jennifer B. Kimble	Email with Committee regarding call materials for 3/12 call.	BK200	0.10	107.50
03/12/25	Jennifer B. Kimble	Email with T. Meyers regarding committee call (.1); Creditor Committee call regarding Debtors' solicitation process (.4).	BK200	0.50	537.50
03/12/25	Todd C. Meyers	Prepare for committee call and email Jenn Kimble (.2); committee call (.4); call with Matt Dundon regarding same (.1).	BK200	0.70	1,067.50
03/12/25	Sameer M. Alifarag	Attend March 12 committee call.	BK200	0.40	370.00
03/13/25	Todd C. Meyers	Exchange with committee member regarding voting.	BK200	0.10	152.50
03/17/25	Sameer M. Alifarag	Draft minutes for March 12, 2025 committee meeting.	BK200	0.20	185.00
03/18/25	Jennifer B. Kimble	Email with L. Murley regarding confidentiality questions.	BK200	0.10	107.50
03/20/25	Jennifer B. Kimble	Emails with L. Murley regarding call to discuss confidentiality.	BK200	0.20	215.00
03/21/25	Jennifer B. Kimble	Call with L. Murley regarding confidentiality concerns related to rejected contracts.	BK200	0.40	430.00
03/24/25	Sameer M. Alifarag	Draft committee update email (.3); email correspondences with J. Kimble and T. Meyers regarding same (.1).	BK200	0.40	370.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/24/25	Jennifer B. Kimble	Emails with S. Alifarag regarding Committee update (.1); review and revise Committee update email (.3); call with M. Hanamirian regarding e-balloting issue (.2).	BK200	0.60	645.00
03/24/25	Todd C. Meyers	Exchange with Sameer Alifarag regarding committee meeting (.1); review email to committee (.1).	BK200	0.20	305.00
03/25/25	Jennifer B. Kimble	Email with S. Alifarag regarding Committee update.	BK200	0.10	107.50
03/25/25	Sameer M. Alifarag	Email correspondences with Committee and professionals regarding case updates.	BK200	0.10	92.50
03/27/25	Jennifer B. Kimble	Emails with T. Meyers regarding Committee update regarding First Omnibus Claim Objection.	BK200	0.10	107.50
03/28/25	Jennifer B. Kimble	Email with T. Meyers regarding First Omnibus Claim objection (.1); review email from Linde regarding claim objection (.1); emails with S. Alifarag regarding drafting Committee update and revisions to the same (.2); email with S. Alifarag regarding response to creditor inquiry (.1).	BK200	0.50	537.50
03/28/25	Sameer M. Alifarag	Email correspondences to Committee regarding first omnibus claim objection (.2); email correspondences with J. Weiss of Linde regarding same (.1).	BK200	0.30	277.50
03/28/25	Todd C. Meyers	Committee email.	BK200	0.10	152.50
03/30/25	Todd C. Meyers	Review and revise committee email regarding status.	BK200	0.10	152.50
03/31/25	Jennifer B. Kimble	Emails with Committee member regarding UK equity sale (.2); review and revise Committee update email (.1); emails with T. Meyers and S. Alifarag regarding weekly committee call and email update (.1).	BK200	0.40	430.00
03/31/25	Sameer M. Alifarag	Email correspondences with T. Meyers and J. Kimble regarding committee call (.1); review of correspondences regarding case updates (.1); draft email correspondences to Committee regarding case updates in lieu of meeting (.2).	BK200	0.40	370.00
03/31/25	Todd C. Meyers	Exchange with Sameer Alifarag regarding committee call (.1); review draft committee email (.1).	BK200	0.20	305.00
<b>Fees for BK200 - Meetings of Creditors</b>				<b>7.60</b>	<b>8,725.00</b>

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK210 - Plan and Disclosure Statement</b>					
03/02/25	Jennifer B. Kimble	Multiple emails with T. Meyers and C. Miller regarding plan issues and TRI.	BK210	0.20	215.00
03/02/25	Todd C. Meyers	Email with Curtis Miller regarding plan objections (.1); exchange with Jenn Kimble regarding litigation trustee role (.1); review TRI notice and stay relief and exchanges regarding same (.4).	BK210	0.60	915.00
03/03/25	Todd C. Meyers	Revise statement in support of DS and email Jenn Kimble regarding same (.5); review revised draft (.2).	BK210	0.70	1,067.50
03/03/25	Sameer M. Alifarag	Draft committee statement in support of disclosure statement and incorporate comments to same (.9); email correspondences with Eversheds team regarding same (.1); review of chapter 11 plan and disclosure statement (.2).	BK210	1.20	1,110.00
03/03/25	Jennifer B. Kimble	Emails with T. Meyers and C. Miller regarding various plan matters (.2); emails with S. Alifarag regarding plan solicitation deadlines (.1); review and revise UCC statement in support of Disclosure Statement (.8); review filed plan to confirm committee resolutions (.2); emails with T. Meyers and S. Alifarag regarding Committee statement and revisions (.2).	BK210	1.50	1,612.50
03/04/25	Sameer M. Alifarag	Email correspondences with Committee regarding statement in support and cancellation of Committee call (.1); review of objections to disclosure statement (.1); review of draft liquidation analysis (.2).	BK210	0.40	370.00
03/04/25	Jennifer B. Kimble	Review redline Committee Statement (.1); call with C. Miller regarding solicitation opt out language and comments from UST (.2); update call with T. Meyers regarding UST issues regarding plan (.1); email with J. Waxman regarding statement in support of Disclosure Statement (.1); review C2C Objection to Disclosure Statement (.2); follow up email correspondence with MNAT on DS objections (.2).	BK210	0.90	967.50
03/04/25	Todd C. Meyers	Conference with Jenn Kimble regarding UST plan issues (.1); review revisions to plan and DS (.3); review DS objection (.1).	BK210	0.50	762.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/05/25	Todd C. Meyers	Review liquidation analysis and various calls and exchanges, and review of revisions regarding same (1.3); exchanges with Jenn Kimble regarding DS hearing status and other issues (.2); exchange regarding LTA (.1).	BK210	1.60	2,440.00
03/05/25	Sameer M. Alifarag	Email correspondences with Eversheds and Dundon teams regarding liquidation analysis and issues in connection with same (.1); email correspondences with Morris James team regarding filing of statement in support (.1); further review of liquidation analysis and compare to wind-down costs under committee settlement (.2); review of Disclosure Statement (.1); review proposed amendments to plan, disclosure statement, and solicitation procedures order (.7); email correspondences with T. Meyers and J. Kimble regarding same (.1).	BK210	1.30	1,202.50
03/05/25	Jennifer B. Kimble	Email with T. Meyers regarding liquidation analysis (.1); various emails with T. Meyers and Dundon team regarding liquidation analysis, DS hearing, plan funding and wind down budget (.5); review and analyze liquidation analysis (.2); emails with C. Carlisle regarding revised Disclosure Statement and plan documents (.2); emails with T. Meyers and S. Alifarag regarding Trust Agreement (.1); email with C. Miller regarding status of Trust Agreement (.1); review redline disclosure statement, plan and solicitation order to ensure conformance with agreement and required changes (.4); emails with T. Meyers and S. Alifarag regarding redline documents, US trustee objection and release opt-out (.2).	BK210	1.80	1,935.00
03/06/25	Sameer M. Alifarag	Review of updated wind-down budget forecast (.1); review of revised liquidation analysis and email correspondences with Eversheds and Dundon teams regarding same (.1); review of March 10 disclosure statement hearing agenda (.1).	BK210	0.30	277.50



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/06/25	Jennifer B. Kimble	Email with T. Meyers regarding further extension of time for UST to file objection (.1); email with S. Alifarag regarding coordinating with MNAT to correct language in DS (.1); emails with Dundon Team and T. Meyers regarding Liquidation Analysis (.3); review updated Liquidation Analysis (.2); review Agenda for 3/10 hearing (.1); email with T. Meyers regarding DS hearing (.1); calls with C. Miller regarding liquidation analysis (.4); update to T. Meyers regarding liquidation analysis and follow up correspondence regarding the same (.3); review updated liquidation analysis (.1); further emails with T. Meyers and Dundon Team regarding further revised liquidation analysis (.3); review revised plan documents (.4).	BK210	2.40	2,580.00
03/06/25	Todd C. Meyers	Review Sameer Alifarag's comments to revised plan and DS (.1); review revised liquidation analysis and exchanges regarding same (.4); review withdrawal of objection (.1); exchanges with MNAT regarding UST resolution (.2); review further revised liquidation analysis (.2); review hearing agenda (.1); review revised agenda (.1).	BK210	1.20	1,830.00
03/07/25	Todd C. Meyers	Exchanges regarding DS hearing (.1); review Pat Healy CV for trustee role (.1).	BK210	0.20	305.00
03/07/25	Jennifer B. Kimble	Review filed versions of Amended Disclosure Statement and Plan (.2); email with S. Alifarag to confirm registration for Zoom appearance for 3/10 hearing (.1); email with J. Waxman regarding 3/10 hearing appearance (.1); call with C. Miller regarding 3/10 hearing (.1); review solicitation order (.1); update email to T. Meyers and J. Waxman regarding 3/10 hearing logistics (.1); email with T. Meyers regarding potential candidates for liquidation trustee (.2); review revised agenda for 3/10 hearing (.1).	BK210	1.00	1,075.00
03/08/25	Todd C. Meyers	Exchange regarding DS hearing status (.1); review amended agenda (.1).	BK210	0.20	305.00
03/09/25	Todd C. Meyers	Review revised DS and Plan and exchange with debtor regarding same.	BK210	0.40	610.00
03/09/25	Jennifer B. Kimble	Emails with T. Meyers and S. Alifarag regarding DS revisions and DS hearing.	BK210	0.20	215.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/10/25	Sameer M. Alifarag	Email correspondences with Eversheds team and debtors' counsel regarding changes to solicitation version of plan and disclosure statement (.1); review and analysis of draft liquidation trust agreement (1.5).	BK210	1.60	1,480.00
03/10/25	Jennifer B. Kimble	Email with S. Alifarag regarding DS revisions to be noted on record at hearing (.1); review status conference update (.1); emails and call with T. Meyers regarding liquidation trustee (.2); email with C. Miller regarding Liquidation Trust Agreement (.1).	BK210	0.50	537.50
03/10/25	Todd C. Meyers	Curtis Miller email regarding DS changes (.2); exchange with Sameer Alifarag regarding DS hearing (.1); exchange regarding drafting of LTA (.1); further exchanges regarding structure of LTA (.2); exchange with Jenn Kimble regarding plan trustee role (.1); call with debtors counsel regarding Abengoa voting issues and email Jenn Kimble regarding same (.7).	BK210	1.40	2,135.00
03/11/25	Jennifer B. Kimble	Emails with T. Meyers regarding draft Trust Agreement.	BK210	0.20	215.00
03/12/25	Sameer M. Alifarag	Review of tax department confirmation objection.	BK210	0.10	92.50
03/12/25	Jennifer B. Kimble	Review confirmation objection filed by State of Nevada (.1); work on revising draft liquidating trust agreement (3.8); emails with S. Alifarag regarding Trust Agreement (.2).	BK210	4.10	4,407.50
03/12/25	Todd C. Meyers	Review Nevada objection and email Curtis Miller regarding same.	BK210	0.20	305.00
03/13/25	Todd C. Meyers	Review amended plan objection (.1); exchanges regarding Abengoa voting issue and conference with Jenn Kimble regarding same (.2); exchanges with Jenn Kimble regarding Trustee role and exchange with Pat Healy regarding same (.2).	BK210	0.50	762.50
03/13/25	Jennifer B. Kimble	Continue revising Liquidation Trust Agreement (3.8); emails with S. Alifarag regarding DE trustee language (.2); review amended confirmation objection filed by the State of Nevada (.1); emails with T. Meyers regarding Liquidation Trustee and liquidation trust agreement (.1); call and email with C. Carlisle (MNAT) regarding Abengoa claim and voting (.2); call with T. Meyers regarding the same (.1).	BK210	4.50	4,837.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/13/25	Sameer M. Alifarag	Research regarding Delaware trustee language (.6); email correspondences with J. Kimble regarding same (.1).	BK210	0.70	647.50
03/14/25	Sameer M. Alifarag	Review of J. Kimble comments to liquidation trust agreement.	BK210	0.60	555.00
03/14/25	Todd C. Meyers	Review amended plan objection (.1); call with Jenn Kimble and exchange regarding LTA (.2).	BK210	0.30	457.50
03/14/25	Jennifer B. Kimble	Continue to review and revise Liquidation Trust Agreement (3.5); review redline Trust Agreement and make further clean up edits (1.0); email with T. Meyers regarding draft Trust Agreement and open issues (.2).	BK210	4.70	5,052.50
03/17/25	Sameer M. Alifarag	Email correspondences with T. Meyers and J. Kimble regarding form liquidation trust agreement (.1); review of updates to same (.3).	BK210	0.40	370.00
03/17/25	Jennifer B. Kimble	Emails with T. Meyers, J. Waxman and E. Monzo regarding Delaware Trustee and Delaware statutory trust (.3); emails with T. Meyers regarding Liquidation Trust Agreement questions (.2); review T. Meyers comments to Liquidation Trust Agreement (.5); call with T. Meyers regarding Liquidation Trust Agreement revisions and questions (.7); revise and edit Liquidation Trust Agreement to incorporate comments from T. Meyers (2.7); emails with C. Miller regarding liquidation trust agreement tax language (.2).	BK210	4.60	4,945.00
03/17/25	Todd C. Meyers	Review and revise LTA (1.5); call with Jenn Kimble regarding same (.7); review precedent regarding Delaware statutory trust provisions (.2); exchanges with local counsel and debtor regarding statutory trust issues (.2); review revised LTA and exchanges with Jenn Kimble regarding same (.7); Luke Murley email regarding JM issues (.1).	BK210	3.40	5,185.00
03/18/25	Sameer M. Alifarag	Review of further updates to draft Liquidation Trust Agreement.	BK210	0.10	92.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/18/25	Jennifer B. Kimble	Revise Trust Agreement to incorporate further revisions and comments from T. Meyers (.9); final review of redline trust agreement (.5); emails with Debtors, Bondholders and PCL regarding identification of proposed Trustee (.1); email with T. Meyers regarding revised Liquidating Trust Agreement (.1); email with C. Miller regarding Liquidating Trust Agreement (.1).	BK210	1.70	1,827.50
03/18/25	Todd C. Meyers	Review LTA and exchange with Jenn Kimble (.1); Jenn Kimble email regarding trustee role (.1); exchange with Curtis Miller regarding same (.1).	BK210	0.30	457.50
03/19/25	Jennifer B. Kimble	Follow up with C. Miller on Trust Agreement.	BK210	0.10	107.50
03/20/25	Jennifer B. Kimble	Review email from MNAT regarding trust agreement (.1); review revised trust agreement language (.3); respond to A. Meng with information in response to two questions posed in email (.2); review revised Liquidating Trust Agreement (.1); emails with MNAT and T. Meyers regarding liquidation trustee fee (.2).	BK210	0.90	967.50
03/20/25	Todd C. Meyers	Review LTA revisions and exchanges with Jenn Kimble regarding same (.3); exchange with MNAT regarding liquidating trustee fee disclosure (.1).	BK210	0.40	610.00
03/21/25	Todd C. Meyers	Review Abengoa plan issues and email MNAT and Jenn Kimble regarding same.	BK210	0.20	305.00
03/21/25	Jennifer B. Kimble	Review email from C. Carlisle regarding Abengoa comments to Plan (.2); email correspondence with T. Meyers regarding the same (.1).	BK210	0.30	322.50
03/22/25	Jennifer B. Kimble	Review email from MNAT regarding draft confirmation order (.1); emails with T. Meyers and J. Nahas regarding updated cash flow (.2).	BK210	0.30	322.50
03/22/25	Todd C. Meyers	MNAT email regarding confirmation order (.1); email Josh Nahas regarding confirming expected cash at effective date (.1).	BK210	0.20	305.00
03/23/25	Todd C. Meyers	Exchange with Josh Nahas regarding budget to actual.	BK210	0.10	152.50
03/23/25	Jennifer B. Kimble	Email with C. Carlisle regarding proposed response to Abengoa plan comments.	BK210	0.10	107.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/24/25	Jennifer B. Kimble	Emails with A. Meng (MNAT) and T. Meyers regarding Liquidation Trust Agreement and Liquidation Trustee (.3); review redline liquidation trust agreement (.3); emails with T. Meyers regarding UCC signoff of Trust Agreement (.1); review Plan Supplement (.2).	BK210	0.90	967.50
03/24/25	Todd C. Meyers	Review revised LTA and exchanges regarding same (.3); exchange with Josh Nahas regarding windown budget (.1).	BK210	0.40	610.00
03/25/25	Jennifer B. Kimble	Emails with T. Meyers and J. Nahas regarding cash bridge to confirmation, Veritas fees and other confirmation issues (.1); review fee information for cash budget (.1); begin review and edit of draft confirmation order (.5).	BK210	0.70	752.50
03/25/25	Todd C. Meyers	Jenn Kimble email regarding TM ballot issue (.1); review email to Henry Jaffe regarding plan issues (.1); exchanges with Josh Nahas regarding wind down budget (.2).	BK210	0.40	610.00
03/26/25	Sameer M. Alifarag	Review of draft confirmation order.	BK210	0.80	740.00
03/26/25	Jennifer B. Kimble	Emails with T. Meyers and J. Nahas regarding plan funding and cash bridge (.1); continue to review and revise Confirmation Order (1.4); email with T. Meyers regarding comments to draft confirmation order (.2).	BK210	1.70	1,827.50
03/26/25	Todd C. Meyers	Exchanges with Josh Nahas and Jenn Kimble regarding Verita charges and budget.	BK210	0.20	305.00
03/27/25	Jennifer B. Kimble	Email with MNAT regarding confirmation order comments and status (.1); multiple emails with T. Meyers regarding resolution of confirmation issues (.2).	BK210	0.30	322.50
03/28/25	Sameer M. Alifarag	Email correspondences with debtors' counsel regarding proposed responses to US Trustee plan comments (.1); email correspondences with debtors' counsel regarding updated exculpation language (.1).	BK210	0.20	185.00
03/28/25	Jennifer B. Kimble	Email with T. Meyers regarding confirmation order (.1); review MNAT proposed response to UST comments to Plan (.2); call with C. Miller regarding UST issues with exculpation provision (.1); review revised exculpation language and send comments to MNAT (.2); review email from C. Miller regarding Abengoa language (.1).	BK210	0.70	752.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/28/25	Todd C. Meyers	Review UST plan issues and debtor proposed response (.2); email exchanges regarding plan exculpation language change (.2); exchange with Jenn Kimble regarding confirmation order (.1); Curtis Miller email regarding Abengoa plan issues (.1).	BK210	0.60	915.00
03/29/25	Jennifer B. Kimble	Emails with T. Meyers and C. Miller regarding Abengoa language and Abengoa claims (.2); email with T. Meyers regarding Confirmation Order (.1).	BK210	0.30	322.50
03/29/25	Todd C. Meyers	Analyze Abengoa language for confirmation order and email comments to Curtis Miller (.5); exchanges with Curtis Miller regarding same (.2); review confirmation order and email Jenn Kimble regarding same (.5).	BK210	1.20	1,830.00
03/30/25	Todd C. Meyers	Email exchanges with Debtor regarding Abengoa and other open issues.	BK210	0.50	762.50
03/31/25	Sameer M. Alifarag	Email correspondences with L. Murley, J. Kimble and debtors' counsel regarding Johnson Matthey confirmation objection (.1); email correspondences with debtors' counsel regarding committee comments to confirmation objection, and review of same (.1).	BK210	0.20	185.00
03/31/25	Todd C. Meyers	Exchange with Clint Carlisle and review response to Abengoa (.2); exchange with MNAT regarding Abengoa complaint (.1); exchange with Jenn Kimble regarding ballot report status (.1); review email to Pashman Stein regarding confirmation order language (.1); exchange with Jenn Kimble regarding confirmation order comments (.1); review TM objection to plan and exchanges regarding same (.2); exchange regarding Abengoa objection extension (.1).	BK210	0.90	1,372.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
03/31/25	Jennifer B. Kimble	Review Abengoa plan and release language (.3); review and revise confirmation order (.7); review email from L. Murley regarding plan objection (.1); review draft Johnson Matthey plan objection (.2); call with C. Carlisle regarding JM objection, Abengoa and other confirmation issues (.2); email with T. Meyers regarding confidentiality issue raised by JM (.1); review NV Dept of Taxation Confirmation Objection (.1); emails with T. Meyers and MNAT regarding draft confirmation order (.2); email with MNAT regarding Committee revisions to Confirmation Order (.1).	BK210	2.00	2,150.00
<b>Fees for BK210 - Plan and Disclosure Statement</b>				<b>61.10</b>	<b>71,967.50</b>
<b>BK220 - Relief from Stay Proceedings</b>					
03/13/25	Todd C. Meyers	Exchange with Curtis Miller regarding stay relief motion (.1); exchange with Jenn Kimble regarding same (.1).	BK220	0.20	305.00
03/13/25	Jennifer B. Kimble	Follow up with T. Meyers and C. Miller regarding TRI Stay Relief Motion and resolution.	BK220	0.20	215.00
03/13/25	Sameer M. Alifarag	Email correspondences with T. Meyers and J. Kimble regarding TRI stay relief motion.	BK220	0.10	92.50
03/17/25	Todd C. Meyers	Review TRI stay relief consent order.	BK220	0.10	152.50
<b>Fees for BK220 - Relief from Stay Proceedings</b>				<b>0.60</b>	<b>765.00</b>
Total Hours/Fees				98.00	\$115,472.50

**SUMMARY OF LEGAL SERVICES**

<b>TIMEKEEPER</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Robert S. Chase	0.60	1,550.00	930.00
Rob Ellis	3.90	1,200.00	4,680.00
Todd C. Meyers	25.50	1,525.00	38,887.50
Jennifer B. Kimble	53.60	1,075.00	57,620.00
Frank Comparetto	0.20	1,100.00	220.00
Sameer M. Alifarag	14.20	925.00	13,135.00
	98.00		115,472.50

**DISBURSEMENTS**

Relativity Hosting	11.16
Relativity User Fees	170.00
Eversheds United Kingdom/9020153735/Professional Fees in	4,439.41

**DISBURSEMENTS**

relation to invoice 9020153735 – Professional Services

**Total Current Disbursements** \$4,620.57

**TOTAL CURRENT BILLING** **\$120,093.07**



EVERSHEDS  
SUTHERLAND

**Eversheds Sutherland (US) LLP**

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Suite 2300  
Atlanta, GA 30309-3996

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eversheds-sutherland.com

IRS Employer ID No: 58-0619407

**Electronic Remittance Instructions:**

Bank Name: Wells Fargo Bank, N.A.  
Acct Name: Eversheds Sutherland (US) LLP  
Acct Number: [REDACTED]  
Wire Routing/ABA: [REDACTED]  
ACH Routing: [REDACTED]  
SWIFT Code: [REDACTED]

**Check Remittance Instructions:**

Eversheds Sutherland (US) LLP  
PO Box 931885  
Atlanta, GA 31193-1885

**Fulcrum Official Committee  
c/o Luke Murley  
1201 North Market Street, Suite 2300  
Wilmington, DE 19801**

Bill No. 1343220  
Bill Date May 6, 2025

**Matter No: 98061.0001  
RE: Fulcrum**

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**FOR LEGAL SERVICES RENDERED THROUGH April 30, 2025**

<b>Fees</b>	<b>\$89,762.50</b>
<b>Total Current Disbursements</b>	<b>\$3,693.95</b>
<b>Total Current Bill</b>	<b>\$93,456.45</b>

**FOR LEGAL SERVICES RENDERED THROUGH April 30, 2025****FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK110 - Asset Disposition</b>					
04/07/25	Sameer M. Alifarag	Review of correspondences with debtors' and committee counsel regarding UK implications to proposed stock sale.	BK110	0.20	185.00
04/07/25	Jennifer B. Kimble	Emails with MNAT re: UK sale questions and forms (.1); email with H. Kaye re: stock transfer form (.1).	BK110	0.20	215.00
04/07/25	Todd C. Meyers	Exchanges with MNAT regarding sale status (.2); exchanges regarding SPA forms (.1).	BK110	0.30	457.50
04/08/25	Jennifer B. Kimble	Email with H. Kaye re: stock transfer documents.	BK110	0.10	107.50
04/09/25	Sameer M. Alifarag	Email correspondences with Eversheds team and debtors' counsel regarding tax issues in connection with proposed stock sale.	BK110	0.10	92.50
04/09/25	Jennifer B. Kimble	Call with C. Carlisle re: UK equity sale order language and UK transfer documents (.2); review PCL sale order to confirm relevant language re: PCL waiver of lien on proceeds (.2); emails with H. Kaye re: UK transfer documents (.2); email with J. Rauchberg re: UK transfer documents (.1).	BK110	0.70	752.50
04/09/25	Todd C. Meyers	Email from UK colleague regarding transfer register for sale.	BK110	0.10	152.50
04/10/25	Jennifer B. Kimble	Follow up with C. Carlisle re: UK equity sale.	BK110	0.10	107.50
04/14/25	Jennifer B. Kimble	Emails with C. Carlisle re: UK Equity Sale Order (.3); review revised UK Equity Sale Order (.2); correspondence with T. Meyers re: UK equity sale order (.1).	BK110	0.60	645.00
04/16/25	Todd C. Meyers	Email exchange regarding equity sale status.	BK110	0.10	152.50
04/23/25	Sameer M. Alifarag	Emails with J. Kimble and debtors' counsel regarding equity sale updates.	BK110	0.10	92.50
04/23/25	Jennifer B. Kimble	Emails with MNAT re: draft UK sale documents (.2); email with H. Kaye re: UK sale documents and review of the same (.2).	BK110	0.40	430.00
04/23/25	Todd C. Meyers	Exchanges regarding SPA; UK colleague email regarding agreements.	BK110	0.20	305.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/24/25	Sameer M. Alifarag	Email correspondences with Eversheds team and debtors' counsel regarding UK stock sale form.	BK110	0.10	92.50
04/24/25	Jennifer B. Kimble	Emails with MNAT and H. Kaye re: questions regarding UK stock transfer forms.	BK110	0.20	215.00
04/24/25	Todd C. Meyers	Email regarding SPA issues.	BK110	0.10	152.50
04/25/25	Todd C. Meyers	Review of changes to documents.	BK110	0.10	152.50
04/26/25	Todd C. Meyers	Exchange with MNAT regarding closing.	BK110	0.10	152.50
04/26/25	Jennifer B. Kimble	Emails with T. Meyers and C. Miller re: status of UK sale closing.	BK110	0.10	107.50
04/29/25	Jennifer B. Kimble	Emails with C. Carlisle and C. Miller re: update on UK sale closing (.2); email with T. Meyers re: wire confirmation update (.1).	BK110	0.30	322.50
04/29/25	Todd C. Meyers	Exchanges regarding status of sale closing.	BK110	0.20	305.00
04/30/25	Jennifer B. Kimble	Emails with C. Carlisle and T. Meyers re: status of sale closing.	BK110	0.30	322.50
04/30/25	Todd C. Meyers	Calls and exchanges regarding closing.	BK110	0.40	610.00
<b>Fees for BK110 - Asset Disposition</b>				<b>5.10</b>	<b>6,127.50</b>

**BK130 - Case Administration and Analysis**

04/03/25	Jennifer B. Kimble	Review amended schedules.	BK130	0.30	322.50
04/03/25	Sameer M. Alifarag	Review of amended schedules of assets and liabilities.	BK130	0.20	185.00
04/16/25	Todd C. Meyers	Jenn Kimble email regarding record retention issues.	BK130	0.10	152.50
04/21/25	Sameer M. Alifarag	Email correspondences with J. Kimble regarding KYC (.1); review of documents in connection with same (.3).	BK130	0.40	370.00
04/21/25	Jennifer B. Kimble	Emails with S. Alifarag and C. Carlisle re: Debtor/ Committee coordination on outstanding fee statements (.2); emails with J. Waxman and E. Monzo re: Fulcrum Fee estimates for Professional Fee Escrow (.1); email with T. Meyers re: fee estimates (.1).	BK130	0.40	430.00
04/21/25	Todd C. Meyers	Emails regarding fee estimates.	BK130	0.10	152.50

**FEE DETAIL**

<b><u>Date</u></b>	<b><u>Timekeeper</u></b>	<b><u>Narrative</u></b>	<b><u>Task</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
04/22/25	Sameer M. Alifarag	Review of KYC items (.4); email correspondences with J. Kimble and debtors' counsel regarding same (.2).	BK130	0.60	555.00
04/22/25	Todd C. Meyers	Email with Curtis Miller regarding post effective date work (.1); exchange with debtor regarding fee estimates (.1); exchange with Josh Nahas regarding cash position at effective date (.1).	BK130	0.30	457.50
04/22/25	Jennifer B. Kimble	Emails with S. Alifarag re: Committee fees (.2); email with C. Carlisle re: sale fees (.1); emails with T. Meyers re: UK sale fees and ESI fees for UK sale (.2).	BK130	0.50	537.50
04/23/25	Sameer M. Alifarag	Work on KYC forms for Fulcrum Bioenergy and Fulcrum Sierra Biofuels (.7); email correspondences with J. Kimble regarding same (.1); calls with Raye Goldsborough regarding same (.5); review of documents in connection with same (.6).	BK130	1.90	1,757.50
04/23/25	Todd C. Meyers	Review WSFS fee letter; email regarding KYC documents.	BK130	0.20	305.00
04/24/25	Todd C. Meyers	Rick Barraza email regarding independent contractor going forward and rates (.1); KYC emails (.1).	BK130	0.20	305.00
04/24/25	Sameer M. Alifarag	Email correspondences with Eversheds team, debtors' counsel, and WSFS team regarding KYC forms (.3); call with R. Goldsborough regarding same (.1); further work on forms and review of documents in connection with same (.3); dial in to call with debtors' and committee's professionals regarding effective date transition (.5).	BK130	1.20	1,110.00
04/25/25	Sameer M. Alifarag	Email correspondences with C. Carlisle and R. Goldsborough of WSFS regarding executed KYC forms (.1); further work on same (.3); email correspondences with T. Meyers and debtors' counsel regarding Dundon estimates for effective date transition (.1).	BK130	0.50	462.50
04/26/25	Todd C. Meyers	Rick Barraza email regarding documents.	BK130	0.10	152.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/28/25	Sameer M. Alifarag	Review of updated liquidation trust agreement (.2); email correspondences with P. Healy, R. Goldsborough, Eversheds team and debtors' counsel regarding same, KYC updates, and effective date updates (.2); review of and revisions to effective date notice (.3); follow up email correspondences with J. Kimble regarding same (.1).	BK130	0.80	740.00
04/29/25	Sameer M. Alifarag	Email correspondences with R. Goldsborough of WSFS regarding execution of Liquidation Trust Agreement (.1); review of March 2025 monthly operating reports (.1).	BK130	0.20	185.00
<b>Fees for BK130 - Case Administration and Analysis</b>				<b>8.00</b>	<b>8,180.00</b>

**BK140 - Claims Adm. and Objections**

04/14/25	Jennifer B. Kimble	Emails with C. Miller and T. Meyers re: scheduling call with Nevada Department of Taxation to address tax claims.	BK140	0.20	215.00
04/16/25	Jennifer B. Kimble	Call with NV Dept. of Taxation re: tax claims (.5); draft summary of call (.2); review tax documents and site referenced by NV (.2); emails with T. Meyers re: NV tax call and notes (.2).	BK140	1.10	1,182.50
04/16/25	Todd C. Meyers	Exchanges regarding call with Nevada regarding tax claim.	BK140	0.30	457.50
04/17/25	Todd C. Meyers	Nevada email regarding tax records.	BK140	0.10	152.50
04/21/25	Jennifer B. Kimble	Emails with S. Alifarag re: Objection Deadline on Debtors' First Omnibus Claim Objection (.1); review CNO on First Omnibus claim objection (.1).	BK140	0.20	215.00
04/22/25	Jennifer B. Kimble	Review order approving First Omnibus Claim Objection.	BK140	0.10	107.50
<b>Fees for BK140 - Claims Adm. and Objections</b>				<b>2.00</b>	<b>2,330.00</b>

**BK141 - Lien Investigation**

04/09/25	Todd C. Meyers	Exchange with Jenn Kimble regarding CD release to estate.	BK141	0.10	152.50
04/09/25	Sameer M. Alifarag	Email correspondences with Eversheds team and bondholder trustee counsel regarding extension of CD challenge period.	BK141	0.10	92.50
04/10/25	Jennifer B. Kimble	Email with T. Meyers re: Bondholder release of letter of credit.	BK141	0.10	107.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/10/25	Sameer M. Alifarag	Email correspondences with J. Kimble and bondholder trustee counsel regarding release of letter of credit.	BK141	0.10	92.50
04/16/25	Sameer M. Alifarag	Email correspondences with Eversheds team, debtors' counsel, and bondholder trustee counsel regarding release of liens on letter of credit.	BK141	0.10	92.50
04/16/25	Todd C. Meyers	Exchanges with Jenn Kimble and Kramer Levin regarding L/C proceeds release.	BK141	0.20	305.00
<b>Fees for BK141 - Lien Investigation</b>				<b>0.70</b>	<b>842.50</b>

**BK160 - Fee/Employment Applications**

04/04/25	Jennifer B. Kimble	Review email re: Verita invoices (.1); review Verita invoices from January and February (.3).	BK160	0.40	430.00
04/10/25	Jennifer B. Kimble	Emails with S. Alifarag re: CNOs for February Fee Statements.	BK160	0.10	107.50
04/10/25	Sameer M. Alifarag	Email correspondences with Dundon team, local counsel, and J. Kimble regarding certificates of no objection on Committee fee applications.	BK160	0.10	92.50
04/11/25	Jennifer B. Kimble	Email with Morris James regarding filed CNOs for February Fee Statements.	BK160	0.10	107.50
04/15/25	Jennifer B. Kimble	Email with T. Meyers re: March monthly fee statement/ final fee application.	BK160	0.10	107.50
04/17/25	Jennifer B. Kimble	Follow up with T. Meyers re: monthly fee statement.	BK160	0.10	107.50
04/18/25	Sameer M. Alifarag	Email correspondences with T. Meyers and J. Kimble regarding March fees (.1); email correspondences with C. Carlisle regarding same (.1).	BK160	0.20	185.00
04/18/25	Jennifer B. Kimble	Email with S. Alifarag re: Debtor professionals March fee statements (.1); email with S. Alifarag re: DSI fee application (.1).	BK160	0.20	215.00
04/21/25	Sameer M. Alifarag	Begin draft of final fee application.	BK160	1.20	1,110.00
04/22/25	Sameer M. Alifarag	Further work on final fee application.	BK160	1.10	1,017.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/25/25	Sameer M. Alifarag	Further work on final fee application.	BK160	0.40	370.00
04/30/25	Sameer M. Alifarag	Further work on final fee application.	BK160	0.20	185.00
<b>Fees for BK160 - Fee/Employment Applications</b>				<b>4.20</b>	<b>4,035.00</b>

**BK170 - Fee/Employment Objections**

04/09/25	Todd C. Meyers	Emails regarding Verita charges.	BK170	0.10	152.50
04/10/25	Sameer M. Alifarag	Review of Verita December and February fee applications.	BK170	0.10	92.50
04/18/25	Sameer M. Alifarag	Review of DSI February fee application.	BK170	0.10	92.50
04/21/25	Todd C. Meyers	Brief review of MNAT monthly fee application.	BK170	0.10	152.50
<b>Fees for BK170 - Fee/Employment Objections</b>				<b>0.40</b>	<b>490.00</b>

**BK180 - Financing**

04/09/25	Jennifer B. Kimble	Emails with C. Miller and C. Carlisle re: status of release of NV Department of Conservation CD (.2); emails with D. Buckley re: extension of challenge period (.1).	BK180	0.30	322.50
04/09/25	Todd C. Meyers	Exchange with Kramer Levin regarding extension.	BK180	0.10	152.50
04/15/25	Jennifer B. Kimble	Draft and send email to D. Buckley re: release of LOC/ CD proceeds and treatment of proceeds as unencumbered collateral.	BK180	0.60	645.00
04/16/25	Jennifer B. Kimble	Email with D. Buckley re: CD proceeds (.1); email with MNAT team re: inclusion of CD proceeds in cash waterfall (.1); review waterfall (.1); emails with T. Meyers and J. Nahas re: post-effective date cash (.1).	BK180	0.40	430.00
<b>Fees for BK180 - Financing</b>				<b>1.40</b>	<b>1,550.00</b>

**BK200 - Meetings of Creditors**

04/01/25	Sameer M. Alifarag	Email correspondences with Committee regarding case updates in lieu of meeting.	BK200	0.10	92.50
04/01/25	Jennifer B. Kimble	Emails with T. Meyers and S. Alifarag re: Committee update.	BK200	0.20	215.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/09/25	Jennifer B. Kimble	Emails with T. Meyers and J. Nahas re: committee update call (.2); draft Agenda for Committee Call (.2); email with Committee re: call agenda and related documents (.1); committee call (.4).	BK200	0.90	967.50
04/09/25	Sameer M. Alifarag	Email correspondences with Committee regarding agenda items for April 9 call (.1); review of documents in connection with same (.1); committee call (.4).	BK200	0.60	555.00
04/09/25	Todd C. Meyers	Email regarding committee call agenda (.1); prepare for committee call (.2); committee call (.4).	BK200	0.70	1,067.50
04/14/25	Sameer M. Alifarag	Draft April 9 committee meeting minutes.	BK200	0.20	185.00
04/14/25	Jennifer B. Kimble	Draft and send email update to Committee re: confirmation hearing.	BK200	0.30	322.50
04/15/25	Jennifer B. Kimble	Emails with T. Meyers re: cancelling weekly committee call.	BK200	0.10	107.50
04/16/25	Sameer M. Alifarag	Email correspondences with Committee regarding case updates and cancellation of committee call.	BK200	0.10	92.50
04/16/25	Todd C. Meyers	Exchange with Jenn Kimble regarding committee call (.1); email to committee regarding status (.1).	BK200	0.20	305.00
04/16/25	Jennifer B. Kimble	Revise email update to Committee (.1); emails with S. Alifarag re: the same (.1).	BK200	0.20	215.00
04/25/25	Todd C. Meyers	Exchange regarding committee call.	BK200	0.10	152.50
04/27/25	Todd C. Meyers	Emails regarding meeting.	BK200	0.10	152.50
04/27/25	Jennifer B. Kimble	Emails with T. Meyers and S. Alifarag re: scheduling committee call.	BK200	0.10	107.50
04/27/25	Sameer M. Alifarag	Email correspondences with Committee regarding final committee call.	BK200	0.10	92.50
04/28/25	Jennifer B. Kimble	Emails with Committee members scheduling final committee call.	BK200	0.10	107.50
04/29/25	Sameer M. Alifarag	Attend final committee call.	BK200	0.50	462.50
04/29/25	Jennifer B. Kimble	Emails with T. Meyers re: Committee call update items (.2); Committee call to update on Effective Date and Next Steps (.5).	BK200	0.70	752.50



**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/29/25	Todd C. Meyers	Committee call (.5); prepare for same (.2); draft call agenda and exchanges with Jenn Kimble regarding same (.2).	BK200	0.90	1,372.50
04/30/25	Sameer M. Alifarag	Draft April 29 committee meeting minutes.	BK200	0.20	185.00
<b>Fees for BK200 - Meetings of Creditors</b>				<b>6.40</b>	<b>7,510.00</b>

**BK210 - Plan and Disclosure Statement**

04/01/25	Sameer M. Alifarag	Email correspondences with Eversheds team and debtors' counsel regarding plan voting report (.1); review of tax department second amended objection (.1); review of balloting report (.1).	BK210	0.30	277.50
04/01/25	Jennifer B. Kimble	Emails with C. Carlisle and T. Meyers re: voting report (.1); review draft voting report (.1); emails with parties re: draft voting report (.1); review updated cash use bridge to confirmation (.1); review revised Abengoa plan language and emails re: the same (.2).	BK210	0.60	645.00
04/01/25	Todd C. Meyers	Exchange regarding ballot report (.1); review same (.1); review Abengoa plan language comments and exchanges with MNAT regarding same (.2).	BK210	0.40	610.00
04/02/25	Todd C. Meyers	Exchanges regarding destruction of JM documents pursuant to plan (.2); review revised Nevada objection (.1); call with Curtis Miller regarding plan issues and email Jenn Kimble regarding same (.2); additional call with Curtis Miller regarding plan issues (.2); exchange regarding section 1121 motion (.1); analyze cash budget and email Josh Nahas regarding same (.1).	BK210	0.90	1,372.50
04/02/25	Sameer M. Alifarag	Email correspondences with debtors' counsel and Johnson Matthey counsel regarding proposed resolution of Johnson Matthey confirmation objection (.1); email correspondences with debtors' counsel regarding proposed revised exculpation language, and research regarding same (.3).	BK210	0.40	370.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/02/25	Jennifer B. Kimble	Emails with C. Carlisle re: JM confidentiality concern (.2); email with T. Meyers re: confidentiality concern and recommendation (.1); review UST plan comments and confirmation language (.1); email with MNAT re: plan language (.1); email with T. Meyers and MNAT re: exclusivity extension motion and hearing on the same (.1); follow up emails with T. Meyers and J. Nahas re: cash position for confirmation (.1).	BK210	0.70	752.50
04/03/25	Jennifer B. Kimble	Emails with L. Murley and C. Carlisle re: document destruction language and resolution of JM confirmation objection (.3); review and revise plan injunction language and send comments to J. Rauchberg (MNAT) (.2); emails with C. Miller re: plan language (.1); review Abengoa Objection to Confirmation (.2); review bondholder language (.1).	BK210	0.90	967.50
04/03/25	Sameer M. Alifarag	Email correspondences with debtors' counsel and Johnson Matthey counsel regarding confirmation objection (.1); email correspondences with debtors' counsel regarding revised exculpatory language (.1); review of Abengoa confirmation objection (.2); review motion to extend exclusivity periods (.1); email correspondences with debtors' counsel regarding bonds trustee fees (.1).	BK210	0.60	555.00
04/03/25	Todd C. Meyers	Work on language regarding payment of indenture trustee fees (.2); review revised plan language (.1); review TM plan language and exchanges with Luke Murley regarding same (.3); Jenn Kimble email regarding plan and exchanges with Curtis Miller regarding same (.2); review exclusivity motion (.1); review Abengoa objection (.2).	BK210	1.10	1,677.50
04/04/25	Jennifer B. Kimble	Review emails re: bond fees confirmation order language (.2); follow up email with C. Carlisle re: plan language (.1).	BK210	0.30	322.50
04/04/25	Todd C. Meyers	Exchanges regarding bondholder fee language (.2); exchange with plan Trustee regarding same (.1).	BK210	0.30	457.50
04/05/25	Sameer M. Alifarag	Email correspondences with debtors' counsel regarding proposed plan modifications regarding distributions.	BK210	0.10	92.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/07/25	Sameer M. Alifarag	Email correspondences with T. Meyers, debtors' counsel and bondholder trustee counsel regarding plan language modification (.2); review of chapter 11 plan (.2); review of proposed redline edits to liquidating trust agreement and chapter 11 plan (.3).	BK210	0.70	647.50
04/07/25	Jennifer B. Kimble	Review emails from MNAT re: revised bondholder language (.2); review MNAT email re: updated plan and liquidation trust agreement (.1); review revised plan (.3); review revised liquidating trust agreement (.2); emails with C. Miller re: revised plan language (.2).	BK210	1.00	1,075.00
04/07/25	Todd C. Meyers	Review Kramer language for plan regarding distributions by trustee (.1); exchange with Pat Healy regarding same (.1); review plan revisions and email MNAT regarding same (.3); Jenn Kimble email regarding comments to plan changes (.1). .	BK210	0.60	915.00
04/08/25	Todd C. Meyers	Exchange with Jenn Kimble regarding confirmation hearing.	BK210	0.10	152.50
04/08/25	Jennifer B. Kimble	Email with T. Meyers re: confirmation hearing (.1); review updated Nevada Confirmation Objection (.1).	BK210	0.20	215.00
04/09/25	Sameer M. Alifarag	Review of voting declaration (.2); review of draft confirmation order (.9); review of draft declaration of Mark Smith in support of confirmation (.3); email correspondences with debtors' counsel regarding confirmation-related updated (.1).	BK210	1.50	1,387.50
04/09/25	Jennifer B. Kimble	Emails with C. Miller and C. Carlisle re: status of resolution of Abengoa Confirmation Objection and confirmation documents (.3); review updated cash forecast at confirmation (.1); review draft voting declaration (.2); review draft Smith Declaration in support of confirmation (.3).	BK210	0.90	967.50
04/09/25	Todd C. Meyers	Jenn Kimble email regarding various plan issues (.1); review cash forecast and exchange with Josh Nahas regarding same (.1); exchange with Jenn Kimble regarding confirmation order (.1).	BK210	0.30	457.50
04/10/25	Todd C. Meyers	Review confirmation brief and declarations (.5); review hearing agenda (.1).	BK210	0.60	915.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/10/25	Sameer M. Alifarag	Review of agenda for confirmation hearing (.1); review of brief in support of confirmation (.7).	BK210	0.80	740.00
04/10/25	Jennifer B. Kimble	Review Agenda for Confirmation Hearing (.1); emails with S. Alifarag re: Confirmation Hearing (.1); emails with T. Meyers and J. Waxman re: confirmation hearing logistics (.1).	BK210	0.30	322.50
04/11/25	Sameer M. Alifarag	Email correspondences with Eversheds team and debtors' counsel regarding resolution of Johnson Mathey informal confirmation objection.	BK210	0.10	92.50
04/11/25	Jennifer B. Kimble	Emails with C. Carlisle and L. Murley re: JMM disclosure in advance of confirmation hearing (.2); review agenda and follow up correspondence with Morris James re: confirmation hearing preparations and documents needed for confirmation (.2); follow up on various confirmation issues and prepare for hearing on 4/14 (.3).	BK210	0.70	752.50
04/11/25	Todd C. Meyers	Review Nevada reply and stay relief motion (.3); exchange with Saul Ewing regarding TM record destruction (.1); email with local counsel regarding hearing (.1).	BK210	0.50	762.50
04/13/25	Todd C. Meyers	Exchange with Luke Murley regarding TM record destruction (.2); review revised agenda (.1).	BK210	0.30	457.50
04/13/25	Sameer M. Alifarag	Email correspondences with debtors' counsel and Johnson Mathey counsel regarding confirmation resolution updates (.1); review of amended agenda and Nevada tax department re-reply to confirmation brief (.1).	BK210	0.20	185.00
04/13/25	Jennifer B. Kimble	Review Debtors' brief in support of confirmation (.5); review NV Department of Taxation Reply Brief (.2).	BK210	0.70	752.50
04/14/25	Jennifer B. Kimble	Meeting at local counsel office to prepare for Confirmation Hearing (.8); attend Confirmation Hearing (1.5); review emails re: confirmation order (.2).	BK210	2.50	2,687.50
04/14/25	Sameer M. Alifarag	Email correspondences and calls with Judge Horan's chambers regarding hearing Zoom link (.1); review of second amended agenda (.1); dial in to confirmation hearing via Zoom (1.2); email correspondences with Committee regarding recap of same (.1).	BK210	1.50	1,387.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/14/25	Todd C. Meyers	Attend hearing (1.5); meet with Jenn Kimble and prepare for same (.8).	BK210	2.30	3,507.50
04/15/25	Jennifer B. Kimble	Review confirmation order.	BK210	0.20	215.00
04/16/25	Jennifer B. Kimble	Email with C. Miller and C. Carlisle re: document storage (.1); analyze transition items (.5); emails with MNAT, Dundon team and T. Meyers re: transition call scheduling (.1).	BK210	0.70	752.50
04/17/25	Todd C. Meyers	Review transition list and email Jenn Kimble regarding comments to same.	BK210	0.20	305.00
04/17/25	Jennifer B. Kimble	Analyze plan and liquidation trust agreement to prepare transition checklist (.7); draft and revise Trust transition checklist (1.2); emails with T. Meyers re: Trust transition checklist (.2).	BK210	2.10	2,257.50
04/18/25	Jennifer B. Kimble	Revise Liquidation Trust Transition memo (.2); emails with T. Meyers re: revised memo (.2); e-mails with MNAT re: scheduling call for Monday 4/21 to discuss Trust transition issues (.2).	BK210	0.60	645.00
04/18/25	Todd C. Meyers	Review revised transition list and email Jenn Kimble regarding same (.1); email to MNAT regarding same (.1).	BK210	0.20	305.00
04/21/25	Todd C. Meyers	All hands transition meeting with MNAT, DSI, Dundon (1.0); email Pat Healy regarding same (.1); email Dundon regarding cash position (.1); transition call with Pat Healy (.5); follow up emails with WSFS regarding same (.2).	BK210	1.90	2,897.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/21/25	Jennifer B. Kimble	Review trust transition checklist and prepare for group call (.3); call with MNAT, Dundon, Eversheds and company teams re: transition matters for trust (1.0); revise checklist for Effective Date Transition and circulate to professionals (.7); emails with T. Meyers and P. Healy re: call to discuss transition to Liquidating Trust (.2); call with P. Healy and T. Meyers re: Trust establishment and transition issues (.5); gather Plan and confirmation documents and send to P. Healy (.5); emails with T. Meyers re: trust next steps; (.2); follow up email with MNAT and other professionals re: scheduling Trust transition call (.1); review KYC information packet (.1); emails with S. Alifarag re: Fulcrum KYC info for WSFS (.2); email with S. Alifarag re: exclusivity motion and review CNO re: the same (.1).	BK210	3.90	4,192.50
04/22/25	Jennifer B. Kimble	Emails with S. Alifarag and T. Meyers re: WSFS KYC paperwork and information needed (.4); email to MNAT requesting information for KYC documents (.2); follow up emails with MNAT, Dundon and Fulcrum Teams re: further trust transition call (.2).	BK210	0.80	860.00
04/22/25	Todd C. Meyers	Review WSFS KYC packet and email Sameer Alifarag regarding same (.2); Sameer Alifarag email to debtor regarding KYC (.1).	BK210	0.30	457.50
04/23/25	Jennifer B. Kimble	Emails with S. Alifarag re: KYC documents (.2); review email from MNAT with KYC information (.1); review draft KYC documents (.1); follow up email with S. Alifarag re: draft documents (.1).	BK210	0.50	537.50
04/23/25	Todd C. Meyers	Exchange with Josh Nahas regarding cash position.	BK210	0.10	152.50
04/24/25	Todd C. Meyers	Email regarding fee estimates for escrow (.1); transition call (.5); work on cash at closing issues including escrow of fee amounts for all parties (.5).	BK210	1.10	1,677.50
04/24/25	Jennifer B. Kimble	Emails with T. Meyers and MNAT re: KYC forms (.2); emails with WSFS re: liquidating trust agreement (.1); call with MNAT, Dundon, DSI and Company teams re: transition to liquidation trust (.5); follow up emails re: open items from Trust transition call (.2); emails with T. Meyers and S. Alifarag re: fee estimates (.1).	BK210	1.10	1,182.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/25/25	Sameer M. Alifarag	Email correspondences with debtors' counsel regarding Abengoa litigation.	BK210	0.10	92.50
04/25/25	Todd C. Meyers	Emails regarding KYC.	BK210	0.10	152.50
04/25/25	Jennifer B. Kimble	E-mails with MNAT re: transition of documents and finalizing KYC paperwork (.2) emails with T. Meyers and S. Alifarag re: Abengoa litigation documents and TRI documents (.2).	BK210	0.40	430.00
04/26/25	Jennifer B. Kimble	Review emails from R. Barraza re: documents related to Trust transition (.2); emails with S. Alifarag re: documents (.1).	BK210	0.30	322.50
04/28/25	Todd C. Meyers	Transition call with debtors (.5); prepare for same (.1); exchange with WSFS regarding same (.3); review notice of effective date and exchange with Jenn Kimble regarding same (.2); call with Curtis Miller regarding same (.1).	BK210	1.20	1,830.00
04/28/25	Jennifer B. Kimble	Email with J. Rauchberg re: liquidating trust agreement (.1); call with MNAT, Dundon, Fulcrum and ES Teams re: transition to trust update (.5); follow up emails with MNAT, T. Meyers and Dundon from transition call (.2); call with T. Meyers re: Liquidation Trust counsel (.1); email with C. Carlisle re: draft Notice of Effective Date (.1); emails with T. Meyers re: Notice of Effective Date (.1); emails with WSFS re: confirmation that bank accounts will be open and wiring instructions for Effective Date funds transfer (.1); review and revise draft Notice of Effective Date (.1); emails with A. Meng re: revisions to Notice of Effective Date (.1); emails with WSFS re: liquidation trust agreement (.1) emails with MNAT and Fulcrum re: trust account wiring instructions (.1); update effective date transition checklist (.2).	BK210	1.80	1,935.00

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
04/29/25	Jennifer B. Kimble	Emails with T. Meyers and M. Dundon re: cash position for Effective Date and transfer of records (.2); follow up on various Effective Date items (.2); review and analyze updated cash flow statement (.2); review email from R. Barraza re: contract rates and correspond with T. Meyers re: the same (.1); emails with R. Barraza re: trust wiring instructions (.1); emails with C. Carlisle and C. Miller re: open trust items (.2); revise checklist of open transition items (.2); call with J. Waxman following Committee call re: effective date (.1); emails with WSFS re: Trust Agreement and signature page for escrow (.1).	BK210	1.40	1,505.00
04/29/25	Todd C. Meyers	Email with Matt Dundon regarding cash at closing (.1); additional emails regarding sale closing, cash at closing and transition items (.6).	BK210	0.70	1,067.50
04/30/25	Jennifer B. Kimble	Follow up on open items for Effective Date (.1); email with C. Miller and C. Carlisle re: outstanding items for effective date (.2).	BK210	0.30	322.50
<b>Fees for BK210 - Plan and Disclosure Statement</b>				<b>42.40</b>	<b>50,575.00</b>
<b>BK220 - Relief from Stay Proceedings</b>					
04/13/25	Jennifer B. Kimble	Review Nevada Department of Taxation Motion for Relief from Stay on Tax Claim Administrative Proceeding.	BK220	0.30	322.50
<b>Fees for BK220 - Relief from Stay Proceedings</b>				<b>0.30</b>	<b>322.50</b>
<b>BK310 - Travel Time</b>					
04/13/25	Jennifer B. Kimble	Travel from New York to Wilmington, DE for Confirmation Hearing (billed at half rate).	BK310	3.00	1,612.50
04/13/25	Todd C. Meyers	Travel to Philadelphia for hearing (billed at half rate).	BK310	3.00	2,287.50
04/14/25	Todd C. Meyers	Travel from Wilmington (billed at half rate).	BK310	3.00	2,287.50
04/14/25	Jennifer B. Kimble	Return travel to New York following Confirmation hearing (billed at half rate).	BK310	3.00	1,612.50
<b>Fees for BK310 - Travel Time</b>				<b>12.00</b>	<b>7,800.00</b>
Total Hours/Fees				82.90	\$89,762.50



**SUMMARY OF LEGAL SERVICES**

<b>TIMEKEEPER</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Todd C. Meyers	6.00	762.50	4,575.00
Todd C. Meyers	18.80	1,525.00	28,670.00
Jennifer B. Kimble	6.00	537.50	3,225.00
Jennifer B. Kimble	34.00	1,075.00	36,550.00
Sameer M. Alifarag	18.10	925.00	16,742.50
	<hr/> 82.90		<hr/> 89,762.50

**DISBURSEMENTS**

Relativity Hosting	22.32
Relativity User Fees	170.00
Meals Cost T#1036 Fulcrum Confirmation Hearing Expenses - Kimble, Jennifer B. - Wilmington, DE – Travel	49.89
Lodging Cost T#1036 Fulcrum Confirmation Hearing Expenses - Kimble, Jennifer B. - Wilmington, DE – Travel	330.00
Train Cost T#1036 Fulcrum Confirmation Hearing Expenses - Kimble, Jennifer B. - Wilmington, DE – Travel	576.00
Parking Cost T#1036 Fulcrum Confirmation Hearing Expenses - Kimble, Jennifer B. - Wilmington, DE – Travel	10.00
Eversheds United Kingdom/9020162911/Professional Fees in relation to invoice 9020162911 – Professional Services	2,535.74

<b>Total Current Disbursements</b>	<b>\$3,693.95</b>
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<b>TOTAL CURRENT BILLING</b>	<b>\$93,456.45</b>
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EVERSHEDS  
SUTHERLAND

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eversheds-sutherland.com

IRS Employer ID No: 58-0619407

**Electronic Remittance Instructions:**

Bank Name: Wells Fargo Bank, N.A.  
Acct Name: Eversheds Sutherland (US) LLP  
Acct Number: [REDACTED]  
Wire Routing/ABA: [REDACTED]  
ACH Routing: [REDACTED]  
SWIFT Code: [REDACTED]

**Check Remittance Instructions:**

Eversheds Sutherland (US) LLP  
PO Box 931885  
Atlanta, GA 31193-1885

**Fulcrum Official Committee  
c/o Luke Murley  
1201 North Market Street, Suite 2300  
Wilmington, DE 19801**

Bill No. 1346056  
Bill Date May 27, 2025

**Matter No: 98061.0001  
RE: Fulcrum**

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**FOR LEGAL SERVICES RENDERED THROUGH May 5, 2025**

<b>Fees</b>	<b>\$9,285.00</b>
<b>Total Current Disbursements</b>	<b>\$1,043.98</b>
<b>Total Current Bill</b>	<b>\$10,328.98</b>

**FOR LEGAL SERVICES RENDERED THROUGH May 5, 2025****FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK110 - Asset Disposition</b>					
05/01/25	Jennifer B. Kimble	Emails with T. Meyers regarding status of UK equity sale closing and potential issues with pushing post-effective date with trust as seller (.2); review sale order regarding issues with Trust as seller (.2); emails with T. Meyers and H. Kaye regarding sale issues (.2); review response from H. Kaye regarding post-effective date sale of UK equity (.2).	BK110	0.80	860.00
05/01/25	Todd C. Meyers	Various email exchanges with UK colleague and Jenn Kimble regarding equity sale changes if not closed before going effective (.3); exchange with Curtis Miller regarding same (.1).	BK110	0.40	610.00
05/02/25	Jennifer B. Kimble	Email with MNAT regarding status of receipt of wire for UK equity.	BK110	0.20	215.00
05/05/25	Jennifer B. Kimble	Emails with T. Meyers and MNAT regarding status of UK equity sale.	BK110	0.20	215.00
<b>Fees for BK110 - Asset Disposition</b>				<b>1.60</b>	<b>1,900.00</b>
<b>BK130 - Case Administration and Analysis</b>					
05/01/25	Sameer M. Alifarag	Email correspondences with T. Meyers, J. Kimble, and Liquidation Trustee regarding effective date updates (.1); email correspondences with Committee regarding same (.1).	BK130	0.20	185.00
05/02/25	Sameer M. Alifarag	Email correspondences with Eversheds team and debtors' counsel regarding effective date status and equity sale closing.	BK130	0.10	92.50
05/05/25	Sameer M. Alifarag	Email correspondences with Liquidation Trustee, debtors' counsel and Eversheds team regarding status of effective date and sale closing.	BK130	0.20	185.00
<b>Fees for BK130 - Case Administration and Analysis</b>				<b>0.50</b>	<b>462.50</b>
<b>BK160 - Fee/Employment Applications</b>					
05/01/25	Sameer M. Alifarag	Further work on final fee application.	BK160	1.50	1,387.50
<b>Fees for BK160 - Fee/Employment Applications</b>				<b>1.50</b>	<b>1,387.50</b>

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
<b>BK170 - Fee/Employment Objections</b>					
05/05/25	Sameer M. Alifarag	Review Morris Nichols' February fee application.	BK170	0.10	92.50
<b>Fees for BK170 - Fee/Employment Objections</b>				<b>0.10</b>	<b>92.50</b>
<b>BK190 - Litigation General</b>					
05/05/25	Todd C. Meyers	Exchange with Curtis Miller regarding litigation funding.	BK190	0.10	152.50
<b>Fees for BK190 - Litigation General</b>				<b>0.10</b>	<b>152.50</b>
<b>BK200 - Meetings of Creditors</b>					
05/05/25	Todd C. Meyers	Emails to committee regarding the status and going effective.	BK200	0.20	305.00
05/05/25	Jennifer B. Kimble	Emails with S. Alifarag regarding Committee update regarding: Effective Date and revisions to update.	BK200	0.20	215.00
<b>Fees for BK200 - Meetings of Creditors</b>				<b>0.40</b>	<b>520.00</b>
<b>BK210 - Plan and Disclosure Statement</b>					
05/01/25	Todd C. Meyers	Exchange with WSFS regarding status (.1); exchanges with Curtis Miller and Jenn Kimble regarding going effective and status of equity sale (.2); additional exchanges with MNAT regarding closing status (.2).	BK210	0.50	762.50
05/02/25	Jennifer B. Kimble	Follow up emails with MNAT regarding effective date (.2); emails with T. Meyers and M. Dundon regarding strategy over effective date (.2).	BK210	0.40	430.00
05/02/25	Todd C. Meyers	Various exchanges regarding going effective (.2); call with Curtis Miller regarding same (.1); additional calls and emails with MNAT and Pat Healy regarding same (.3).	BK210	0.60	915.00
05/03/25	Jennifer B. Kimble	Further emails with T. Meyers and MNAT regarding effective date and fee estimates (.2); email with J. Waxman regarding effective date timing (.1).	BK210	0.30	322.50
05/05/25	Todd C. Meyers	Numerous exchanges and calls regarding going effective (.8); review revised notice of effective date (.1).	BK210	0.90	1,372.50

**FEE DETAIL**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
05/05/25	Jennifer B. Kimble	Emails with WSFS regarding status of effective date and timing of wires (.2); emails with MNAT regarding status of effective date and timing of wires (.2); email with MNAT regarding revised notice of effective date (.1); review revised Notice of Effective Date (.1); emails with T. Meyers, MNAT and Dundon regarding effective date escrows (.3).	BK210	0.90	967.50
<b>Fees for BK210 - Plan and Disclosure Statement</b>				<b>3.60</b>	<b>4,770.00</b>
Total Hours/Fees				7.80	\$9,285.00

**SUMMARY OF LEGAL SERVICES**

<b>TIMEKEEPER</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
Todd C. Meyers	2.70	1,525.00	4,117.50
Jennifer B. Kimble	3.00	1,075.00	3,225.00
Sameer M. Alifarag	2.10	925.00	1,942.50
	<u>7.80</u>		<u>9,285.00</u>

**DISBURSEMENTS**

Trip #1185- Food Expense: Wilmington, DE Fulcrum Hearing - Meyers, Todd C. – Travel	25.33
Trip #1185- Airfare Expense: Wilmington, DE Fulcrum Hearing - Meyers, Todd C. – Travel	456.96
Trip #1185- Lodging Expense: Wilmington, DE Fulcrum Hearing - Meyers, Todd C. – Travel	364.23
Trip #1185- Taxi Expense: Wilmington, DE Fulcrum Hearing - Meyers, Todd C. – Travel	176.96
Trip #1185- Parking Expense: Wilmington, DE Fulcrum Hearing - Meyers, Todd C. – Travel	20.50

**Total Current Disbursements** **\$1,043.98**

**TOTAL CURRENT BILLING** **\$10,328.98**

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

In re:

FULCRUM BIOENERGY, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-12008 (TMH)

(Jointly Administered)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of June, 2025, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the *Combined Monthly and Final Fee Application of Eversheds Sutherland (US) LLP for Allowance of Compensation and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for (I) Monthly Period from March 1, 2025 Through and Including May 5, 2025 and (II) Final Period from September 21, 2024 Through and Including May 5, 2025* upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and an additional service was competed via electronic mail on the parties listed on the attached service list.

/s/ Eric J. Monzo  
Eric J. Monzo (DE Bar No. 5214)

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with each debtor's federal tax identification numbers are: Fulcrum BioEnergy, Inc. (3733); Fulcrum Sierra BioFuels, LLC (1833); Fulcrum Sierra Finance Company, LLC (4287); and Fulcrum Sierra Holdings, LLC (8498). The location of the Debtors' service address is: Fulcrum BioEnergy Inc., P.O. Box 220 Pleasanton, CA 94566.

**Service List**

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Curtis S. Miller, Esq.  
Daniel B. Butz, Esq.  
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*United States Trustee*