

**CULLEN AND DYKMAN LLP**

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*Counsel to the Official Committee of Unsecured Creditors  
 of Midwest Christian Villages Inc., et al.*

UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF MISSOURI  
 EASTERN DIVISION

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In re:	: Chapter 11
	:
MIDWEST CHRISTIAN VILLAGES, INC.	: Case No. 24-42473-659
<i>et al.</i> , <sup>1</sup>	:
	: (Jointly Administered)
	:
Debtors.	:
	:
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**FEE APPLICATION SUMMARY SHEET**

**THIRD INTERIM APPLICATION FOR ALLOWANCE OF  
 COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
 REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP AS**

<sup>1</sup> The address of the Debtors headquarters is 2 Cityplace Dr, Suite 200, Saint Louis, MO 63141 - 7390. The last four digits of the Debtors' federal tax identification numbers are: (i) Midwest Christian Villages, Inc. [5009], (ii) Hickory Point Christian Village, Inc. [7659], (iii) Lewis Memorial Christian Village [3104], (iv) Senior Care Pharmacy Services, LLC [1176], (v) New Horizons PACE MO, LLC [4745], (vi) Risen Son Christian Village [9738], (vii) Spring River Christian Village, Inc. [1462], (viii) Christian Homes, Inc. [1562], (ix) Crown Point Christian Village, Inc. [4614], (x) Hoosier Christian Village, Inc. [3749], (xi) Johnson Christian Village Care Center, LLC [8262], (xii) River Birch Christian Village, LLC [7232], (xiii) Washington Village Estates, LLC [9088], (xiv) Christian Horizons Living, LLC [4871], (xv) Wabash Christian Therapy and Medical Clinic, LLC [2894], (xvi) Wabash Christian Village Apartments, LLC [8352], (xvii) Wabash Estates, LLC [8743], (xviii) Safe Haven Hospice of Southern Illinois, LLC [7209], (xix) Heartland Christian Village, LLC [0196], (xx) Midwest Senior Ministries, Inc. [3401], (xxi) Shawnee Christian Nursing Center, LLC [0068], and (xxii) Safe Haven Hospice, LLC [6886].



**COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF  
MIDWEST CHRISTIAN VILLAGES INC., ET AL. FOR THE PERIOD FROM  
MARCH 1, 2025 THROUGH AND INCLUDING JUNE 30, 2025**

Name of Applicant:	Cullen and Dykman LLP
Authorized to Provide Professional Services as:	Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., <i>et al.</i>
Name of Client:	The Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., <i>et al.</i>
Petition Date:	July 16, 2024
Date of Retention:	September 23, 2024, effective as of August 12, 2024
Date of Order Approving Employment:	September 23, 2024
Blended Rate in this Application for all Timekeepers:	\$545.00
Period for which Compensation and Expense Reimbursement is Requested:	March 1, 2025 – June 30, 2025
Total Interim Compensation Requested:	\$97,325.50
Total Requested Expense Reimbursement	\$8.09
Number of Professionals Included in this Application:	4
Total Compensation and Expenses Previously Requested:	\$439,669.14 (excludes March – June comp.)
Total Compensation and Expenses Previously Awarded:	\$439,669.14
Name, Billing Rate, and Department of Professionals Included in this Application:	<i>See Exhibit E.</i>
Total Hours:	152.4

This is a(n) :        \_\_\_ monthly    **X** interim        \_\_\_ final application

**CULLEN AND DYKMAN LLP**

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EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

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In re: : Chapter 11  
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MIDWEST CHRISTIAN VILLAGES, INC. : Case No. 24-42473-659  
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Debtors. :   
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COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP AS  
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF  
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<sup>1</sup> The address of the Debtors headquarters is 2 Cityplace Dr, Suite 200, Saint Louis, MO 63141 - 7390. The last four digits of the Debtors' federal tax identification numbers are: (i) Midwest Christian Villages, Inc. [5009], (ii) Hickory Point Christian Village, Inc. [7659], (iii) Lewis Memorial Christian Village [3104], (iv) Senior Care Pharmacy Services, LLC [1176], (v) New Horizons PACE MO, LLC [4745], (vi) Risen Son Christian Village [9738], (vii) Spring River Christian Village, Inc. [1462], (viii) Christian Homes, Inc. [1562], (ix) Crown Point Christian Village, Inc. [4614], (x) Hoosier Christian Village, Inc. [3749], (xi) Johnson Christian Village Care Center, LLC [8262], (xii) River Birch Christian Village, LLC [7232], (xiii) Washington Village Estates, LLC [9088], (xiv) Christian Horizons Living, LLC [4871], (xv) Wabash Christian Therapy and Medical Clinic, LLC [2894], (xvi) Wabash Christian Village Apartments, LLC [8352], (xvii) Wabash Estates, LLC [8743], (xviii) Safe Haven Hospice of Southern Illinois, LLC [7209], (xix) Heartland Christian Village, LLC [0196], (xx) Midwest Senior Ministries, Inc. [3401], (xxi) Shawnee Christian Nursing Center, LLC [0068], and (xxii) Safe Haven Hospice, LLC [6886].

Cullen and Dykman LLP (“**C&D**”), counsel to The Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., *et al.* (the “**Committee**”), hereby submits this third interim application (the “**Third Interim Application**”) seeking entry of an order, substantially in the form attached hereto as **Exhibit A**, (i) granting allowance of compensation and reimbursement of actual and necessary expenses, pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rules 2016-1 and 2016-2 of the Local Bankruptcy Rules for the Eastern District of Missouri, Eastern Division (the “**Local Rules**”), and the *United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases*, effective as of November 1, 2013 (the “**U.S. Trustee Guidelines**”) for the period from March 1, 2025 through and including June 30, 2025 (the “**Compensation Period**”). In support of this Application, C&D respectfully states as follows:

### **Jurisdiction and Venue**

1. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rules 2016-1 and 2016-2.

### **Background**

2. On July 16, 2024 (the “**Petition Date**”), Midwest Christian Villages Inc., *et al.*, (the “**Debtors**”) filed voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code. This chapter 11 filing was precipitated by, among other things, the impact of COVID-19

on the Debtors' facilities, in addition to material additional costs related to employee wages, agency staffing costs, increased food and other vendor costs, and increased construction/capital expenditure costs.

3. The Court granted joint administration of the Debtors' cases on July 19, 2024. *See* Dkt. No. 59.

4. The Debtors remain in possession of their property and continue to operate and manage their businesses as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

5. On August 8, 2024, the Office of the United States Trustee (the "**U.S. Trustee**") appointed the Committee (Dkt. No. 121). The Committee is currently comprised of the following members: (i) Donald H., (ii) Select Rehabilitation, LLC, (iii) Michael C. and Jacqueline B., (iv) Sentinel Technologies, Inc., and (v) Penny F.

**A. Retention of C&D as Counsel to the Committee**

6. On August 28, 2024, C&D filed the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Pursuant to 11 U.S.C. § 1103 Authorizing and Approving the Employment and Retention of Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors, Effective as of August 12, 2024* (Dkt. No. 202) (the "**Retention Application**"). On September 23, 2024, effective as of August 12, 2024, the Court approved the Retention Application and entered the *Order Pursuant to 11 U.S.C. § 1103 Authorizing and Approving the Employment and Retention of Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors, Effective as of August 12, 2024* (Dkt. No. 336) (the "**Retention Order**").

7. The Retention Order authorized the Debtors to compensate and reimburse C&D in accordance with the Bankruptcy Code, Bankruptcy Rules, the Local Rules, and any other applicable order or procedures of the Court, at the ordinary and customary hourly rates charged for services of the type rendered in connection with these chapter 11 cases. The Retention Order also authorized the Debtors to reimburse C&D for its actual and necessary expenses incurred.

#### **B. C&D's First Interim Application**

8. On November 15, 2024, C&D filed its *First Interim Application for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred by Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. for the Period from August 12, 2024 Through and Including October 31, 2024* (Dkt. No. 453) (the “**First Interim Application**”). On December 17, 2024, the Court entered an Order approving C&D's First Interim Application (Dkt. No. 525) (the “**First Interim Order**”).

9. The First Interim Order, among other things, awarded C&D compensation in the amount of \$295,684.00 for professional services rendered, and reimbursement of actual and necessary expenses incurred in connection with the services in the amount of \$2,695.05.<sup>2</sup>

#### **C. C&D's Second Interim Application**

10. On March 21, 2025, C&D filed its *Second Interim Application for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred by Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. for the Period from November 1, 2024 Through and Including February 28, 2025* (Dkt. No. 656) (the “**Second Interim Application**”). On June 2,

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<sup>2</sup> C&D submitted monthly fee statements in accordance with the Local Rules, for services rendered during the period which comprised the First Interim Application compensation period.

2025, the Court entered an Order approving C&D's Second Interim Application (Dkt. No. 738) (the "**Second Interim Order**").

11. The Second Interim Order, among other things, awarded C&D compensation in the amount of \$141,113.50 for professional services rendered, and reimbursement of actual and necessary expenses incurred in connection with the services in the amount of \$176.59.<sup>3</sup>

**D. C&D's Monthly Fee Statements During the Compensation Period**

12. Pursuant to Rule 2016-2 B of the Local Rules, C&D has submitted four (4) monthly fee statements for services rendered in the months of March 2025, April 2025, May 2025, and June 2025 (*i.e.*, the Compensation Period) (each a "**Monthly Fee Statement**", and collectively, the "**Monthly Fee Statements**"), pursuant to which C&D has received 80% of its fees and 100% of its expenses incurred during those months.<sup>4</sup> A summary of C&D's Monthly Fee Statements for the Compensation Period is annexed hereto as **Exhibit B**.

13. On or about April 2, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in March 2025 (the "**March Fee Statement**") to Kurtzman Carson Consultants, LLC, d/b/a Verita Global ("**Verita**") for service upon the master service list, seeking (i) interim allowance of (i) \$38,450.50 for the total amount of fees and expenses related to C&D's work during the period from March 1, 2025 through and including March 31, 2025; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$0.00 for actual

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<sup>3</sup> C&D submitted monthly fee statements in accordance with the Local Rules for services rendered during the period which comprised the Second Interim Application compensation period.

<sup>4</sup> As of the date of this Third Interim Application, payment pursuant to the June Fee Statement (defined below) has not been received. However, C&D expects that by the time the hearing on this Third Interim Application is held and the order entered approving the fees requested herein, it will have received 80% of its fees and 100% of its expenses in accordance thereto.



and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the March Fee Statement.

14. On or about May 2, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in April 2025 (the “**April Fee Statement**”) to Verita for service upon the master service list, seeking (i) interim allowance of (i) \$19,149.12 for the total amount of fees and expenses related to C&D’s work during the period from April 1, 2025 through and including April 30, 2025; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$5.12 for actual and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the April Fee Statement.

15. On or about June 5, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in May 2025 (the “**May Fee Statement**”) to Verita for service upon the master service list, seeking (i) interim allowance of (i) \$16,924.97 for the total amount of fees and expenses related to C&D’s work during the period from May 1, 2025 through and including May 31, 2025; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$2.97 for actual and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the May Fee Statement.

16. On or about July 2, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in June 2025 (the “**June Fee Statement**”) to Verita for service upon the master service list, seeking (i) interim allowance of (i) \$22,809.00 for the total amount

of fees and expenses related to C&D's work during the period from June 1, 2025 through and including June 30, 2025; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$0.00 for actual and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the June Fee Statement.

17. C&D now submits its Third Interim Application requesting interim approval and allowance of professional fees in the amount of \$97,325.50 for services rendered and reimbursement of expenses in the amount of \$8.09 incurred during this third Compensation Period. This is C&D's third request for compensation and reimbursement of expenses in these cases. The Committee members have been provided with a copy of C&D's Third Interim Application. The Committee has approved C&D's Third Interim Application.

18. The amounts to be paid to C&D from any amount awarded will be reduced by payments previously received.

19. As set forth in the certification of Michael H. Traison, Esq. dated July 14, 2025, attached hereto as **Exhibit C**, this Third Interim Application complies with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the U.S. Trustee Guidelines.

**Summary of Services Performed By C&D During the Compensation Period**

20. As more fully described herein, C&D has provided substantial legal services to the Committee during the Compensation Period. In accordance with the Local Rules, a summary of the total time expended, and amount of compensation sought by project category is attached hereto as **Exhibit D**. A listing of the name, title, practice group, and first year of bar admission, if applicable, for each professional person who rendered services to the Committee is attached

hereto as **Exhibit E**. Attached hereto as **Exhibit F** is a detailed computer-generated summary of the time expended by each professional and the services rendered by C&D as counsel to the Committee in each category during the Compensation Period. Indicated below is each category and the compensation sought by C&D for services performed on the Committee's behalf:

1. Case Administration (B110)	\$ 31,856.50
2. Asset Analysis and Recovery (B120)	\$ 6,092.50
3. Asset Disposition (B130)	\$ 5,530.50
4. Prepare for and Attend Hearings (B135)	\$ 8,266.00
5. Relief from Stay/Adequate Protection Proceedings (B140)	\$ 0.00
6. Meetings of & Communications with Creditor (B150)	\$ 10,023.50
7. Fee/Employment Applications (B160)	\$ 3,895.00
8. Fee/Employment Objections (B170)	\$ 0.00
9. Avoidance Action Analysis (B180)	\$ 0.00
10. Assumption/Rejection of Leases and Contracts (B185)	\$ 0.00
11. Non-Working Travel (B195)	\$ 0.00
12. Debtor In Possession Finance Issues (B205)	\$ 24,621.00
13. Business Operations (B210)	\$ 0.00
14. Employee Benefits/Pensions (B220)	\$ 0.00
15. Financing/Cash Collections (B230)	\$ 553.00
16. Tax Issues (B240)	\$ 0.00
17. Real Estate (B250)	\$ 0.00
18. Litigation, Contested Matters, & Adversary Proceedings (B280)	\$ 0.00
19. Claims Administration and Objections (B310)	\$ 5,714.50

20. Plan and Disclosure Statement (B320)	\$ 0.00
21. Budgeting (B330)	\$ 451.00
22. Reporting (B340)	\$ 0.00
23. Valuation (B450)	\$ 0.00
24. Corporate Governance (B470)	\$ 322.00

21. During the Compensation Period, C&D has expended a total of 152.40 hours in this matter for total requested compensation of \$97,325.50 at its usual customary hourly rates. The average blended hourly rate was \$545.00.

22. During the Compensation Period, C&D has incurred expenses totaling \$8.09. Attached hereto as **Exhibit G** is a summary of the expenses incurred during the Third Application Period for which reimbursement is sought herein. C&D does not charge for incoming faxes. Instead, C&D charges \$1.00 per page for outgoing faxes, which C&D believes covers the expenses associated with facsimile usage. Copying charges are assessed at \$.10 per copy. Reimbursement for those costs, as well as all other disbursements in this case, is sought in accordance with the applicable Local Rules.

23. C&D has set forth below a narrative of the legal services provided to the Committee in order to inform the Court of the legal services rendered to the Committee by C&D during the third Compensation Period. The summary of services performed by C&D is only intended to highlight the general categories of services provided by C&D on the Committee's behalf. It is not intended to set forth each and every item of professional services that C&D performed for the Committee. All of the services for which compensation is sought herein were performed for, or on behalf of, the Committee.

**Category 1**  
**Case Administration**

24. The first category of services rendered by C&D relates to services performed for the benefit of the Committee in furtherance of general case administration, including:

- Reviewing case docket and pleadings and evaluating same to update Committee regarding status of chapter 11 cases;
- Reviewing insurance claims;
- Reviewing pending issues regarding litigation and breach of contract;
- Review and discussion of settlement in estate matters;
- Preparing and invoicing professional fees.

25. In rendering services relating to this category, C&D attorneys expended 41.20 hours for requested compensation at their customary and usual hourly rates for a total of \$31,856.50. C&D's blended hourly rate for services rendered in this category is \$668.33.

**Category 2**  
**Asset Analysis and Recovery**

26. The second category of services performed by C&D relates to C&D's work analyzing estate assets and potential recovery so that it may maximize the value of the estates for the benefit of creditors.

27. Services rendered by C&D in the second category of services include the following:

- Drafting multiple correspondence to Debtors' lead and special counsel regarding information required for Committee to fulfill fiduciary duty to estates;
- Researching potential asset recovery avenues;
- Conferring with Committee's financial advisors regarding amended estimate of unsecured claims;
- Reviewing and analyzing reports on cash and budgets;

- Reviewing remnant asset purchase agreements.

28. In rendering services relating to this category, C&D attorneys expended 7.60 hours for requested compensation at their customary and usual hourly rates for a total of \$6,092.50. C&D's blended hourly rate for services rendered in this category is \$797.50.

**Category 3**  
**Asset Disposition**

29. The third category of services provided by C&D relates to potential sale or disposition of estate assets in the Debtors' chapter 11 cases.

30. Services rendered by C&D in the third category of services include the following:

- Communications regarding sale processes and details;
- Reviewing and analyzing sale orders, proposed allocation of sale proceeds, APAs, and assumption issues, including with respect to pharmacy sale and caring home sale;
- Conferring with professionals for Debtors and bondholders regarding sales and proceeds.

31. In rendering services relating to this category, C&D attorneys expended 6.90 hours for requested compensation at their customary and usual hourly rates for a total of \$5,53.50. C&D's blended hourly rate for services rendered in this category is \$797.50.

**Category 4**  
**Preparation For/Attend Court Hearings**

32. During the Compensation Period, C&D performed services on the Committee's behalf to prepare for and attend multiple Court hearings and status conferences, including virtual and telephonic hearings.

33. In rendering services relating to this category, C&D attorneys expended 10.30 hours for requested compensation at their customary and usual hourly rates for a total of \$8,266.00. C&D's blended hourly rate for services rendered in this category is \$797.50.

**Category 5**  
**Relief from Stay/Adequate Protection Proceedings**

34. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 6**  
**Meetings of & Communications with Creditor**

35. The sixth category of services relates to C&D's preparing for and attending, conducting, and participating in meetings with the Committee. C&D prepared for and attended weekly teleconferences with the Committee, as needed, during which C&D advised the Committee concerning the status of the chapter 11 cases, particularly concerning claims of creditors, settlement of claims, and insurance issues.

36. In rendering services relating to this category, C&D attorneys expended 12.50 hours for requested compensation at their customary and usual hourly rates for a total of \$10,023.50. C&D's blended hourly rate for services rendered in this category is \$797.50.

**Category 7**  
**Fee/Employment Applications**

37. During the Compensation Period, C&D performed services in this category, specifically to compile, prepare, and review financial data and records for the second interim application, and draft the application.

38. In rendering services relating to this category, C&D attorneys expended 9.50 hours for requested compensation at their customary and usual hourly rates for a total of \$3,895.00. C&D's blended hourly rate for services rendered in this category is \$410.00.

**Category 8**  
**Fee/Employment Objections**

39. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 9**  
**Avoidance Action Analysis**

40. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 10**  
**Assumption/Rejection of Leases & Contracts**

41. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 11**  
**Non-Working Travel**

42. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 12**  
**Debtor in Possession Finance Issues**

43. The twelfth category of services relates to C&D's review and analysis of debtor-in-possession financing issues and correspondence with professionals regarding the same, including with respect to settlement of \$1.6 million escrow dispute, revisions to the debtor-in-possession financing and extension agreements, commingling issues, the Hopp estate claim, and



memorandum prepared by financial advisors regarding liens, post-petition liens, and insurance proceeds.

44. In rendering services relating to this category, C&D attorneys expended 30.60 hours for requested compensation at their customary and usual hourly rates for a total of \$24,621.00. C&D's blended hourly rate for services rendered in this category is \$797.50.

**Category 13**  
**Business Operations**

45. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 14**  
**Employee Benefits/Pensions**

46. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 15**  
**Financing/Cash Collections**

47. The fifteenth category relates to C&D's review of financing documents and specifically, review of the extended DIP budget, DIP amendment, and DIP Order.

48. In rendering services relating to this category, C&D attorneys expended 0.7 hours for requested compensation at their customary and usual hourly rates for a total of \$553.00. C&D's blended hourly rate for services rendered in this category is \$790.00.

**Category 16**  
**Tax Issues**

49. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 17**  
**Real Estate**

50. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 18**  
**Litigation/Contested Matters and Adversary Proceedings**

51. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 19**  
**Claim Administration and Objections**

52. The nineteenth category relates to review and examination of issues with respect to certain claims, including researching treatment and allocation of settlement funds intended to benefit a personal injury claimant commingled with other funds subject to a lien, imposition of a constructive trust, and review of the claim settlement agreement.

53. In rendering services relating to this category, C&D attorneys expended 31.60 hours for requested compensation at their customary and usual hourly rates for a total of \$5,714.50. C&D's blended hourly rate for services rendered in this category is \$482.50.

**Category 20**  
**Debtors' Plan and Disclosure Statement**

54. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 21**  
**Budgeting**

55. The twenty-first category relates to C&D's review of and reconciliation of payments and budgeting-related issues.

56. In rendering services relating to this category, C&D attorneys expended 1.10 hours for requested compensation at their customary and usual hourly rates for a total of \$451.00. C&D's blended hourly rate for services rendered in this category is \$410.00.

**Category 22**  
**Reporting**

57. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 23**  
**Valuation**

58. C&D did not incur any time or expense in this category during the Compensation Period.

**Category 24**  
**Corporate Governance**

59. The twenty-fourth category relates to C&D's correspondence with the Committee regarding administrative matters and governance deliberations.

60. In rendering services relating to this category, C&D attorneys expended 0.4 hours for requested compensation at their customary and usual hourly rates for a total of \$322.00. C&D's blended hourly rate for services rendered in this category is \$805.00.

**Summary of Application**

61. C&D submits that compensation for the services rendered and reimbursement of expenses incurred as set forth in this Third Interim Application is reasonable based on: (i) the time and labor required; (ii) the complexity of the legal questions presented; (iii) the skill required to perform the legal services; (iv) the customary compensation for bankruptcy professionals in New York; and (v) the experience and ability of the attorneys providing

services. With respect to each of these standards, C&D submits that the compensation requested is reasonable and appropriate.

**Applicable Legal Standards**

62. Section 330(a) of the Bankruptcy Code provides for the compensation of reasonable and necessary services rendered by professionals retained under section 327 of the Bankruptcy Code, as follows:

(1)(A) reasonable compensation for actual, necessary services rendered by the . . . attorney and by any paraprofessional person employed by any such person; and

(B) reimbursement for actual, necessary expenses.

\* \* \*

(3) 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).

63. Additionally, the Fifth Circuit elaborated on the necessary considerations in determining the award of attorneys' fees, noting that the court should consider the request in light of the following twelve (12) factors: (1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 715, 718-19 (5th Cir. 1974).

64. C&D respectfully submits that the hours worked by C&D's personnel were reasonable and necessary given the numerous and oftentimes complex legal issues which arose during these chapter 11 cases. Further, C&D believes that the time spent was justified by the results that have been achieved thus far.

65. The rates being charged by C&D are commensurate with, if not less than, those typically charged by other firms in this District, as well as those of other nationally recognized firms specializing in bankruptcy.

66. C&D submits that the professional services for which it seeks compensation and the expenditures for which it seeks reimbursement in this Third Interim Application were necessary and appropriate to assist the Committee and maximize the benefit to the creditors of the Debtors.

67. The services rendered were performed within a reasonable amount of time by professionals with the seniority and skill level commensurate with the complexity, importance,

and nature of the problem, issue or task addressed. Whether reviewed individually as to each of the tasks described above or collectively as a whole, the professional services were performed expediently and efficiently to accomplish the needs of the Committee in these chapter 11 cases.

68. C&D submits that the compensation sought in this Third Interim Application is reasonable and necessary under the applicable standards. Approval of the compensation for professional services and reimbursement of expenses sought herein is warranted. C&D therefore respectfully requests that the Court grant the Third Interim Application.

#### **Notice**

69. Notice of this Third Interim Application has been provided in accordance with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, and U.S. Trustee Guidelines. C&D respectfully submits that further notice of this Third Interim Application is neither required nor necessary.

#### **Conclusion**

70. Through C&D's efforts, the Committee has made significant progress in these chapter 11 cases, including reviewing and examining all possible avenues to maximize recovery for creditors. C&D has worked diligently during the Compensation Period to help the Committee address an array of issues in these cases. Accordingly, C&D submits that its services have provided substantial value to the Committee, and requests that this Third Interim Application be approved in its entirety.

**WHEREFORE**, for the reasons set forth herein, C&D respectfully requests that the Court enter an Order (a) approving C&D's interim fees in the amount of **\$97,325.50** and reimbursement of expenses in the amount of **\$8.09**, in connection with this Third Interim Application; (b) authorizing and directing the Debtors' to remit payment of such sums to C&D

within five (5) business days of entry of an order approving this Application; and (c) granting such other relief as the Court deems is just and proper.

Dated: New York, New York  
July 14, 2025

CULLEN AND DYKMAN LLP

By: /s/ Michael H. Traison  
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*Counsel to the Official Committee of  
Unsecured Creditors of Midwest Christian  
Villages Inc., et al.*

# **Exhibit A**

## **Proposed Order**



UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re:

MIDWEST CHRISTIAN VILLAGES, INC. *et al.*,

Debtors.

Chapter 11

Case No. 24-42473-659

(Jointly Administered)

Related Docket No. 703

**ORDER APPROVING THIRD INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP  
AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE PERIOD FROM MARCH 1, 2025 THROUGH JUNE 30, 2025**

Cullen and Dykman LLP (“C&D”), having filed its *Third Interim Application for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred by Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. for the Period from March 1, 2025 Through and Including June 30, 2025* (the “**Application**”); and the Court having reviewed the Application; and all applicable requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules having been satisfied; and it appearing that the compensation earned and expenses incurred by C&D during the Compensation Period were actual, reasonable and necessary; and sufficient notice of the Application having been provided and no other or further notice being required; and all persons with standing having been afforded an opportunity to be heard on the Application at a hearing held to consider approval of the Application; and upon all

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Application is hereby **GRANTED** as set forth herein.
2. C&D is allowed, on an interim basis, compensation in the amount of \$97,325.50 for professional services rendered during the Compensation Period as counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., *et al.* (the “**Committee**”).
3. C&D is allowed the reimbursement of actual and necessary expenses incurred during the Compensation Period in connection with its services to the Committee in the amount of \$8.09.
4. The Debtors are authorized and directed to remit payment to C&D in the amount of \$97,333.59, less all amounts that the Debtors previously paid to C&D on account of such fees and expenses.
5. Any payment made or to be made pursuant to this Order, and all authorization contained herein, shall be in compliance with and subject to the Final DIP Order [Docket No. 377] and the DIP Budget attached as Exhibit 1 thereto (as may have been amended or extended from time to time).
6. This Order shall be effective immediately upon entry.
7. Not later than two (2) business days after the date of this Order, C&D shall serve or cause to be served, a copy of the Order and shall file or cause to be filed a certificate of service no later than twenty-four (24) hours after service.

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KATHY A. SURRATT-STATES  
U.S. Bankruptcy Judge

Dated: \_\_\_\_\_, 2025

St. Louis, Missouri

**Proposed Order submitted by:**

**CULLEN AND DYKMAN LLP**

Michael H. Traison, Esq.  
Michelle McMahon, Esq.  
Kyriaki Christodoulou, Esq.  
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*Counsel to The Official Committee of Unsecured Creditors*

– and –

**SCHMIDT BASCH, LLC**

Amanda M. Basch, Esq.  
1034 S. Brentwood Blvd., Suite 1555  
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*Local Counsel to The Official Committee of Unsecured Creditors*

**Exhibit B**

**Summary of Monthly Fee Statements**

**Third Interim Fee Application**

Date Served	Period Covered	Total Compensation and Expenses Incurred for Period Covered		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date		Holdback Requested
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees	Expenses	
4/3/2025	3/1/2025-3/31/2025	\$38,450.50	\$0.00	\$30,760.40	N/A	\$30,760.40	N/A	\$7,690.10
5/5/2025	4/1/2025-4/30/2025	\$19,144.00	\$5.12	\$15,315.20	\$5.12	\$15,315.20	\$5.12	\$3,828.80
6/5/2025	5/1/2025-5/31/2025	\$16,922.00	\$2.97	\$13,537.60	\$2.97	\$13,537.60	\$2.97	\$3,384.40
7/7/2025	6/1/2025-6/30/2025	\$22,809.00	\$0.00	\$18,247.20	N/A	\$0.00	N/A	\$4,561.80
<b>Total for Third Interim Fee Application</b>		<b>\$97,325.50</b>	<b>\$8.09</b>	<b>\$77,860.40</b>	<b>\$8.09</b>	<b>\$59,613.20</b>	<b>\$8.09</b>	<b>\$19,465.10</b>

Summary of Any Objections to Monthly Fee Statements: None.  
Compensation Sought in this Application Not Yet Paid: \$37,712.30<sup>1</sup>

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<sup>1</sup> This includes 100% of fees owed pursuant to the June Fee Statement, for which 80% is expected prior to entry of the Third Interim Fee Order.

## **Exhibit C**

### **Traison Declaration**

**CULLEN AND DYKMAN LLP**

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*Counsel to the Official Committee of Unsecured Creditors  
of Midwest Christian Villages Inc., et al.*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

-----X  
In re: : Chapter 11  
: :  
MIDWEST CHRISTIAN VILLAGES, INC. : Case No. 24-42473-659  
*et al.*,<sup>1</sup> :  
: (Jointly Administered)  
: :  
Debtors. :  
: :  
-----X

**CERTIFICATION IN SUPPORT OF THIRD INTERIM APPLICATION FOR  
ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP  
AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF  
MIDWEST CHRISTIAN VILLAGES INC., ET AL. FOR THE PERIOD FROM MARCH 1,  
2025 THROUGH AND INCLUDING JUNE 30, 2025**

I, Michael H. Traison, hereby certify that:

<sup>1</sup> The address of the Debtors headquarters is 2 Cityplace Dr, Suite 200, Saint Louis, MO 63141 - 7390. The last four digits of the Debtors' federal tax identification numbers are: (i) Midwest Christian Villages, Inc. [5009], (ii) Hickory Point Christian Village, Inc. [7659], (iii) Lewis Memorial Christian Village [3104], (iv) Senior Care Pharmacy Services, LLC [1176], (v) New Horizons PACE MO, LLC [4745], (vi) Risen Son Christian Village [9738], (vii) Spring River Christian Village, Inc. [1462], (viii) Christian Homes, Inc. [1562], (ix) Crown Point Christian Village, Inc. [4614], (x) Hoosier Christian Village, Inc. [3749], (xi) Johnson Christian Village Care Center, LLC [8262], (xii) River Birch Christian Village, LLC [7232], (xiii) Washington Village Estates, LLC [9088], (xiv) Christian Horizons Living, LLC [4871], (xv) Wabash Christian Therapy and Medical Clinic, LLC [2894], (xvi) Wabash Christian Village Apartments, LLC [8352], (xvii) Wabash Estates, LLC [8743], (xviii) Safe Haven Hospice of Southern Illinois, LLC [7209], (xix) Heartland Christian Village, LLC [0196], (xx) Midwest Senior Ministries, Inc. [3401], (xxi) Shawnee Christian Nursing Center, LLC [0068], and (xxii) Safe Haven Hospice, LLC [6886].

1. I am a partner with the applicant firm, Cullen and Dykman LLP (“**C&D**”), which serves as counsel to The Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., *et al.* (the “**Committee**”) in these chapter 11 cases. As such, I am fully familiar with the facts and circumstances set forth herein.

2. I have reviewed the *Third Interim Application For Allowance of Compensation For Professional Services Rendered and Reimbursement of Expenses Incurred By Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. For the Period From March 1 2025, Through and Including June 30, 2025* (the “**Third Interim Application**”)<sup>2</sup>, filed contemporaneously herewith. To the best of my knowledge, information, and belief, the statements contained in the Third Interim Application are true and correct. In addition, I believe the Third Interim Application complies with the Local Bankruptcy Rules.

3. In connection therewith, I also hereby certify that:

- i. to the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought in the Third Interim Application are permissible under the relevant rules, court orders and Bankruptcy Code provisions;
- ii. the fees and disbursements sought in the Third Interim Application are billed at rates and are in accordance with practices customarily employed by C&D and are generally accepted by C&D’s clients;
- iii. in providing reimbursable service, C&D does not make a profit in its performance of reimbursable services, whether the service is performed in-house or through a third party;
- iv. C&D did not increase its hourly rates during the Compensation Period; and
- v. the Third Interim Application includes approximately 10 hours for reviewing or revising C&D’s time records and invoices.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms in the Third Interim Application.

4. With respect to Section B.2 of the Local Rules, I hereby certify that the Committee chair has been provided a copy of the Third Interim Application, including statements of fees and out-of-pocket expenses, lists of professionals providing services, their respective billing rates, the work hours expended by each individual, descriptions of services rendered, and a reasonably detailed breakdown of out-of-pocket expenses incurred, at least twenty-one (21) days prior to the hearing on the Third Interim Application. I further certify that in accordance with the Local Rules, C&D submitted monthly fee statements for March through June during this Compensation Period and was paid 80% of the requested fees and expenses in accordance with the Debtors' budget<sup>3</sup>.

5. The following table demonstrates the amounts C&D has requested and received, which, pursuant to Local Rule 2016-2 C, are subject to approval, modification or disgorgement on interim application:

<b><u>Monthly Fee Statement</u></b>	<b><u>Total Compensation Requested</u></b>	<b><u>Compensation Actually Received (80%)</u></b>	<b><u>Expenses Requested</u></b>	<b><u>Expenses Actually Received (100%)</u></b>
Mar. 1, 2025 – Mar. 31, 2025	\$38,450.50	\$30,760.40	\$0.00	--
Apr. 1, 2025 – Apr. 30, 2025	\$19,144.00	\$15,315.20	\$5.12	\$5.12
May 1, 2025 – May 31, 2025	\$16,922.00	\$13,537.60	\$2.97	\$2.97
Jun. 1, 2025 – Jun. 30, 2025	\$22,809.00	TBD	\$0.00	--

6. In accordance with Section B.3 of the Local Rules, I hereby certify to the best of my knowledge, information, and belief, and my participation in the status conferences and review and monitoring of the docket, that the information contained in the Third Interim Application regarding the general administrative status of the Debtors' chapter 11 cases, is true and correct.

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<sup>3</sup> As of the date of the Third Interim Application, C&D has not been paid on its June Monthly Fee Statement.



7. In accordance with Section B.4 of the Local Rules, I hereby certify to the best of my knowledge, information, and belief, that the information contained in the Third Interim Application regarding the twelve factors set forth by the Fifth Circuit in *Johnson v. Georgia Highway Express, Inc.*, have been identified and sufficiently satisfied with a summary of significant events which have occurred in these chapter 11 cases and a summary of major activities under each project category.

8. In accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, I certify that no agreement or understanding exists between C&D and any other entity for the sharing of compensation received or to be received for services rendered in or in connection with the above cases except as authorized pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules. All services for which compensation is sought were professional services on behalf of the Committee and not on behalf of any other person.

Dated: New York, New York  
July 14, 2025

CULLEN AND DYKMAN LLP

By: /s/ Michael H. Traison  
Michael H. Traison, Esq.  
Michelle McMahon, Esq.  
Kyriaki Christodoulou, Esq.  
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*Counsel to the Official Committee of Unsecured  
Creditors of Midwest Christian Villages Inc., et  
al.*

**Exhibit D**

**Compensation By Project Category**

Billing Code	Project Category	Hours	Fees
B110	Case Administration	41.2	31,856.50
B120	Asset Analysis and Recovery	7.6	6,092.50
B130	Asset Disposition	6.9	5,530.50
B135	Prepare for and Attend Hearings	10.3	8,266.00
B150	Meetings of & Communications with Creditor	12.5	10,023.50
B160	Fee/Employment Applications	9.5	3,895.00
B205	Debtor In Possession Finance Issues	30.6	24,621.00
B230	Financing/Cash Collections	0.7	553.00
B310	Claims Administration and Objections	31.6	5,714.50
B330	Statement	1.1	451.00
B470	Corporate Governance	0.4	322.00
<b>Grand Total</b>		<b>152.4</b>	<b>97,325.50</b>

## **Exhibit E**

### **Information for Professionals Rendering Services During Compensation Period**

**CULLEN AND DYKMAN LLP**  
**Information for Professionals Rendering Services During Compensation Period**

<b><u>Professional</u></b>	<b><u>Timekeeper No.</u></b>	<b><u>Title</u></b>	<b><u>Group</u></b>	<b><u>Bar Admission</u></b>	<b><u>Billing Rate</u></b>	<b><u>Hours</u></b>	<b><u>Total</u></b>
Michael H. Traison	9130	Partner	Bankruptcy and Restructuring	1983	\$805	97.4	\$78,407.00
Michelle K. McMahon	9091	Partner	Bankruptcy and Restructuring	2000	\$790	9.8	\$7,742.00
Kyriaki A. Christodoulou	9492	Associate	Bankruptcy and Restructuring	2021	\$410	13.9	\$5,699.00
Sharlene Cubelo	7332	Associate /Law Clerk	Bankruptcy and Restructuring	2025	\$175	31.3	\$5,477.50
<b>Total Hours Billed:</b>	<b>152.4</b>						
<b>Total Fees Billed:</b>	<b>\$97,325.50</b>						

**Exhibit F**

**Detailed Computer-Generated Summary of Time Expended During Compensation Period**

Date	Billing Code	Name	Hours	Amount	Narrative
03/03/2025	B110	MICHAEL H TRAISSON	0.60	483.00	Correspondence from attorney David Sasner regarding Corbridge closings; examination of documents, including stipulation
03/04/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with team to circulate February fee statement for service.
03/05/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Review service email from claims agent. Calendar deadline to object to February Fee Statement.
03/05/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Receipt and review motion to reject certain executory contracts, and unexpired leases
03/05/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Receipt and review of motion for entry of order, authorizing record, retention policy and disposal of certain patient and non-patient records
03/10/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Calls with Mr. Richards and calls with attorney for bond holders regarding issues and facts pertaining to escrow monies
03/10/2025	B110	MICHAEL H TRAISSON	1.00	805.00	Conference call with counsel for personal injury plaintiff; discuss alternatives; consult with Debtor in Possession legal counsel consider issues
03/10/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Mr. Richards with budget issues and consultation with financial advisor to committee and follow up
03/11/2025	B110	MICHAEL H TRAISSON	1.00	805.00	Attention to issues regarding insurance, payment and claims of creditors; working on resolution of issues to enable closing And review of spreadsheets provided by the Debtor in Possession
03/11/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence to financial advisors regarding unsecured claims pool and distribution possibilities and analysis and receive response and consideration as to Hopp claim
03/11/2025	B110	MICHAEL H TRAISSON	0.80	644.00	Research Re commingling and state law
03/12/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Monthly operating report and notice of agenda examination and report to committee
03/12/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Receipt and review of multiple filings, including report of compensation to professional services provided to the debtor
03/14/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Telephone call from committee member regarding insurance payments
03/17/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Call from attorney, Ewa Golebiowski regarding claims made policies, reimbursement policies, post petition claims
03/17/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence to Mr. Richards regarding insurance issues as well as agenda for hearing
03/18/2025	B110	MICHAEL H TRAISSON	0.80	644.00	Consultation and preparation regarding report on escrow funds issue, and commingling
03/18/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Follow up on inquiry regarding personal injury, creditors, and insurance policy issues
03/18/2025	B110	MICHELLE K MCMAHON	0.20	158.00	Review docket and correspond with Committee professionals and Committee regarding scheduled Committee meeting.
03/19/2025	B110	KYRIAKI CHRISTODOULOU	0.30	123.00	Confer with team and HMP re: payment of recent invoice and related issues.
03/19/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Correspondence from Mr. Richards regarding fee applications and attention to preparation and order objection dates
03/19/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence to Mr. Richards regarding factual issues pertaining to the escrow fund
03/19/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Receipt and review of filings and notices
03/20/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Receipt and review of objection to motion for an order, approving the form of notice to creditors and other matters
03/20/2025	B110	MICHAEL H TRAISSON	1.00	805.00	Working on fee application and review of application and attachments
03/21/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Further attention to escrow money issue, and creditor claims
03/21/2025	B110	MICHAEL H TRAISSON	0.60	483.00	Working on the application and review
03/23/2025	B110	MICHAEL H TRAISSON	0.80	644.00	Revise memorandum regarding creditor claim, and analysis of same
03/24/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence to Mr. Richards with memorandum of law regarding claim of Creditor for recovery
03/25/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Receipt and review of province monthly billing

Date	Billing Code	Name	Hours	Amount	Narrative
03/27/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Multiple correspondence with Mr. Richards and examination of proof of claim filed
03/31/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Correspondence from attorney, Jim Finnegan regarding Hopp, family estate claim and response to same
03/31/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Discuss with counsel dismissal of cases, liquidation plans, most efficient way to maximize return, and other strategy issues
03/31/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Receive and review monthly operating reports
04/01/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Receipt and review of deck for presentation to committee from province financial advisor to committee
04/02/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Review March invoice and circulate to Verita for service.
04/04/2025	B110	MICHAEL H TRAISSON	1.00	805.00	Review of newly filed, pleading; attention to pending objections, Reck claims; administration of case
04/07/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Review service of March fee statement and calendar objection deadline.
04/07/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Correspondence from and to Province re status and consult re committee updates
04/10/2025	B110	MICHAEL H TRAISSON	1.00	805.00	Correspondence to counsel regarding Hopp estate; review of pleading filed and docket
04/10/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Receipt and review of quarterly statement regarding payments made to ordinary course professionals
04/14/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Attention to administrative matters and upcoming omnibus hearing and issues to be heard
04/15/2025	B110	MICHAEL H TRAISSON	1.00	805.00	Receipt and review of declaration and disclosure of Gaffar Ray Bradley Associates; Seaton review certificates of service and submissions by Kurtzman; review of statements by professionals summary: review and processing order on application and motion to reject lease; motion to expedite; motion to extend exclusivity.
04/16/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Oak point partners regarding bidding on residual assets and purchase agreement
04/17/2025	B110	MICHAEL H TRAISSON	0.60	483.00	Receipt and review Declaration and Disclosure Statement of Daniel S. Gaafar on Behalf of Bradley Associates, P.C. And Notice of Filing of Debtors' Third Quarterly Statement Regarding Payments Made to Ordinary Course Professionals for Services Rendered During the Period January 1, 2025 Through March 31, 2025
04/18/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Correspondence with chambers re: request for access to upcoming hearing.
04/18/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Correspondence with healthcare management re: payment of last invoice.
04/18/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence to and from management regarding professional applications
04/18/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Examination of quarterly reports; examination of notices and examination of docket
04/19/2025	B110	MICHAEL H TRAISSON	0.90	724.50	Receive and review communications from legal counsel for the bondholders; consider offer and correspondence to attorneys for the Hopp Estate requesting consideration and response
04/21/2025	B110	MICHAEL H TRAISSON	0.60	483.00	Attention to compromise and correspondence to and from Castagna
04/21/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence from counsel to the Harper estate with counter proposal regarding offer of bond holders
04/21/2025	B110	MICHAEL H TRAISSON	0.90	724.50	Correspondence from financial advisor and examination of intro application and respond to inquiries
04/21/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Request for documentation and support regarding communications of insurance company
04/21/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Responsive correspondence to counsel and correspondence to bondholders and debtor conveying counterproposal
04/22/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Correspondence from Province with request to review fee application and response and filing



Date	Billing Code	Name	Hours	Amount	Narrative
05/01/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Laura Castagna regarding counteroffer status and response
05/01/2025	B110	MICHAEL H TRAISSON	0.80	644.00	Motion for relief from automatic stay by Timberlake Estates Supportive Living, LLC and associated pleadings and docket review
05/02/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Review April invoice and confer internally re: outstanding amounts due. Circulate April invoice to Verita for service.
05/02/2025	B110	MICHAEL H TRAISSON	0.60	483.00	Correspondence from Laura Castagna regarding Hopp claim and follow-up and correspondence to Eric Blythe regarding Settlement offers re Hopp estate
05/06/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Ewa Golabek re lifting stay and insurance claim and respond.
05/15/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Prepare for and exchange of correspondence with counsel
05/15/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Receipt in review of filings by healthcare management and professional expenses, and review of same
05/16/2025	B110	MICHAEL H TRAISSON	0.70	563.50	Multiple correspondence from Laura Castagna regarding settlement and request for follow up and assist with facilitation.
05/19/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence to legal counsel for bondholder regarding a half state settlement
05/20/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence from bondholder counsel in response to mediation and facilitation efforts
05/21/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with team and with HCM re: payment of April invoice and details re: the same.
05/21/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Attention to administrative matters and follow up
05/27/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Attend committee meeting and participate, including correspondence to and from committee members
05/27/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Call from Jim Finnegan and discuss strategy and resolution of claims and possible adversary proceeding
05/27/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Hopp estate lawyers responding to settlement proposal
05/27/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Follow up re Hopp estate
05/28/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Attention to professional services order and correspondence to and from financial advisor
06/02/2025	B110	MICHAEL H TRAISSON	0.80	644.00	Correspondence from legal counsel for debtor and review orders entered by court; correspondence regarding consent to executory, contract, order, and receipt and review of order
06/04/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Confer with HCMP re: amounts paid and confer internally to reconcile payment reports.
06/04/2025	B110	MICHAEL H TRAISSON	1.00	805.00	Attention to administrative matters; correspondence from and to Austin Poff; multiple correspondence and attention to billing matters
06/04/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Receipt and review of debtor third omnibus objection to claims
06/04/2025	B110	MICHAEL H TRAISSON	0.70	563.50	Receipt and review of notice of May 2025 and June 2025 budget; examination of budgets; and examination of further notices and filings
06/04/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Review certificate of service documents served; motion to reject, executory contract; motion to extend exclusive; and notice of hearing
06/05/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Circulate May Fee Statement for service on MSL. Calendar deadline to object to fees.
06/06/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Receipt and review term sheet from hop estate, and correspondence to Bond holder counsel
06/09/2025	B110	KYRIAKI CHRISTODOULOU	0.40	164.00	Review payments and update accounting based on payment received pursuant to order granting second interim fee application.
06/09/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Correspondence from special counsel for claimant Hopp estate and reply to inquiries and response received
06/11/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Correspondence from and to committee member and calls with status report

Date	Billing Code	Name	Hours	Amount	Narrative
06/11/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Correspondence from Mr. Richards regarding non-performance of purchaser of remnant assets; examine correspondence to purchaser and demand for performance by the DIP; set up conference call and discuss issue at Mr. Richards' request
06/11/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence to Mr. Richards, regarding claims of personal injury, plaintiffs, quantification of amount, and exploring possibilities of recovery
06/11/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Follow up regarding Hopp estate settlement
06/11/2025	B110	MICHELLE K MCMAHON	0.20	158.00	Review docket and emails and correspond with M. Traison regarding status update for Committee member.
06/12/2025	B110	MICHAEL H TRAISSON	0.30	241.50	Conference call with Mr. Richards regarding breach of contract
06/17/2025	B110	KYRIAKI CHRISTODOULOU	0.40	164.00	Review invoices and wires to confirm payments and reconcile books.
06/18/2025	B110	KYRIAKI CHRISTODOULOU	0.20	82.00	Add payment received to record of payments spreadsheet and calculate outstanding amount owed. Correspondence with team regarding the same.
06/19/2025	B110	MICHAEL H TRAISSON	0.20	161.00	Correspondence from and to Jim re Hobbs Estate claims; correspondence to creditor counsel
06/20/2025	B110	MICHAEL H TRAISSON	1.00	805.00	Review of pending issues regarding litigation and breach of contract to purchase remnant assets; meeting with Mr. Richards regarding same; discussing settlement in Hobbs estate matter
06/23/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Receipt and review of final draft of complaint regarding adversary proceeding against dependent for breach of contract for purchase
06/26/2025	B110	MICHAEL H TRAISSON	0.50	402.50	Receipt in review of file adversary proceeding, and accompanying documents and report to committee
06/30/2025	B110	MICHAEL H TRAISSON	0.40	322.00	Correspondence to and from Jim Finnegan regarding settlement of the estate claim
	<b>B110 Total</b>		<b>41.20</b>	<b>31,856.50</b>	
03/17/2025	B120	MICHELLE K MCMAHON	0.60	474.00	Teleconference with S. Cubelo regarding research regarding potential asset recovery.
03/19/2025	B120	MICHAEL H TRAISSON	0.20	161.00	Exchanges of correspondence with bondholders' counsel re escrowed funds and progress of research
03/21/2025	B120	MICHELLE K MCMAHON	0.40	316.00	Review memo regarding potential asset recovery.
03/26/2025	B120	MICHAEL H TRAISSON	0.20	161.00	Correspondence to financial advisors and debtor regarding updated amended estimate of current unsecured claims
03/26/2025	B120	MICHAEL H TRAISSON	0.30	241.50	Draft form of order on the procedures for remaining asset sales.
04/16/2025	B120	MICHAEL H TRAISSON	0.30	241.50	Review new docket items and review of notice of filing and debtors third quarterly statement regarding payments to ordinary course professionals
05/20/2025	B120	MICHAEL H TRAISSON	0.80	644.00	Multiple correspondence to end from dip and Sean, O'Connor and committee financial consultant regarding sale of assets
05/21/2025	B120	MICHAEL H TRAISSON	0.90	724.50	Correspondence from Hopp estate attorney and response to same; additional correspondence and forwarding responses of bondholder lawyers; advice and encouragement resettlement
05/21/2025	B120	MICHAEL H TRAISSON	1.00	805.00	Revised version of the Remnant APA folding in comments received from bondholder's counsel and an interim redline of those latest changes and a cumulative redline of all changes from original form.
05/23/2025	B120	MICHAEL H TRAISSON	0.30	241.50	Correspondence from legal counsel re Hopp claim
05/28/2025	B120	MICHAEL H TRAISSON	1.00	805.00	Correspondence from legal counsel to the trustee of the bondholders; response regarding issues raised; working on settlement; correspondence to Hoppe, estate, lawyers.
06/20/2025	B120	MICHELLE K MCMAHON	0.70	553.00	Meeting with B. Richards and M. Traison regarding Remnant Sale and case conclusion (.5); review draft complaint related to Remnant Sale (.2).
06/24/2025	B120	MICHAEL H TRAISSON	0.90	724.50	Receipt of correspondence from Mr. Taylor regarding settlement of claim; review of redline and final draft of motion and agreement and response to Mr. Taylor

Date	Billing Code	Name	Hours	Amount	Narrative
	<b>B120 Total</b>		<b>7.60</b>	<b>6,092.50</b>	
03/04/2025	B130	MICHELLE K MCMAHON	0.30	237.00	Review draft motion to sell de minimis assets.
					Correspondence from Mr. Richards regarding asset purchase agreement regarding pharmacy, business purchase, and scheduling for hearing and consideration of same
03/13/2025	B130	MICHAEL H TRAISSON	0.20	161.00	
03/13/2025	B130	MICHELLE K MCMAHON	0.20	158.00	Review motion and APA related to sale of the pharmacy.
					Correspondence to Laura Castagna and her co-counsel regarding bondholder offer to negotiate settlement and requesting closure on the funds being held from insurance payments owed to Hopp estate
03/26/2025	B130	MICHAEL H TRAISSON	0.30	241.50	
05/19/2025	B130	MICHAEL H TRAISSON	0.40	322.00	Correspondence from Mr. Richards in correspondence from Eric Blythe regarding caring home sale
05/20/2025	B130	MICHELLE K MCMAHON	0.20	158.00	Review correspondence from Debtors' regarding additional asset sale.
05/21/2025	B130	MICHELLE K MCMAHON	0.40	316.00	Review draft APA and correspond from Debtors' counsel and financial advisors.
					Correspondence to Eric Blythe on behalf of the bondholder trustee, relaying the settlement and proposing outline of steps to be taken next to effectuate final settlement
05/27/2025	B130	MICHAEL H TRAISSON	0.30	241.50	
05/29/2025	B130	MICHAEL H TRAISSON	0.90	724.50	Working on settlement proposal; correspondence from on Holder counsel regarding preparation; correspondence from and to council for claimants
06/04/2025	B130	MICHAEL H TRAISSON	0.20	161.00	Receipt and review debtors second notice of designation of satisfied claims
06/12/2025	B130	MICHAEL H TRAISSON	0.60	483.00	Correspondence from legal counsel and discussions and follow up regarding offer and counter offers regarding sale of Remnants
06/12/2025	B130	MICHELLE K MCMAHON	0.50	395.00	Review documents and correspondence and teleconference with M. Traisson and B. Richards regarding remanent sale issues.
					Continued communications with estate, lawyer and debtor lawyer and resolve division of assets and release issues yet to be agreed upon; follow up correspondence from attorneys, Eric Blythe and Clay Taylor
06/23/2025	B130	MICHAEL H TRAISSON	1.00	805.00	
06/23/2025	B130	MICHAEL H TRAISSON	0.40	322.00	Correspondence from Mr. Finnegan regarding settlement proposal and response and explanations
06/30/2025	B130	MICHAEL H TRAISSON	0.30	241.50	Call from Mr. Finegan and discussion of remaining issues and process and settlement
06/30/2025	B130	MICHAEL H TRAISSON	0.20	161.00	Consideration and formulation of response to Mr. Finnegan re settlement
06/30/2025	B130	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Mr. Blythe re Hopp estate including provisions from agreement responding to Hopp lawyer request
					Supplementary correspondence from Mr. Finnegan with restatement of need for court approval from state court as well as court approval in bankruptcy court and need for exact numbers needed. Reply to Mr. Finegan regarding same.
06/30/2025	B130	MICHAEL H TRAISSON	0.30	241.50	
	<b>B130 Total</b>		<b>6.90</b>	<b>5,530.50</b>	
03/17/2025	B135	MICHAEL H TRAISSON	0.30	241.50	Preparation for omnibus hearing and pending items
					Review correspondence from Mr. Richard; review proposed agenda and itemization of matters to be presented to court; preparation and planning regarding appearance at court on next omnibus hearing; respond to questions regarding case administration and applications to be filed; response from Mr. Richards and reply to same
03/19/2025	B135	MICHAEL H TRAISSON	0.90	724.50	
03/21/2025	B135	MICHAEL H TRAISSON	0.40	322.00	Receipt and review of second interim application of Sommer's Compton Wells, and notice of hearing
03/25/2025	B135	MICHAEL H TRAISSON	0.60	483.00	Receipt and review of agenda for omnibus hearing and prepare for hearing;
03/26/2025	B135	MICHAEL H TRAISSON	1.00	805.00	Attend omnibus hearing and follow up
03/26/2025	B135	MICHAEL H TRAISSON	0.80	644.00	Preparation for presentations, motions, and actions at omnibus hearing
04/18/2025	B135	MICHAEL H TRAISSON	0.40	322.00	Review agenda and attention to items which will be presented at omnibus hearing

Date	Billing Code	Name	Hours	Amount	Narrative
04/18/2025	B135	MICHELLE K MCMAHON	0.20	158.00	Review agenda and correspond with M. Traison and court regarding hearing appearance.
04/21/2025	B135	MICHAEL H TRAISSON	0.60	483.00	Preparations for omnibus, hearing, including agenda, items and communications with court regarding attendance
04/22/2025	B135	MICHAEL H TRAISSON	1.00	805.00	Attend omnibus hearing and participation
04/22/2025	B135	MICHAEL H TRAISSON	1.10	885.50	Stipulation and proposed order regarding claim of the State of Illinois; stipulation and order regarding claim of constellation new energy; notice of agenda filed regarding hearing; preparations for hearing
04/22/2025	B135	MICHELLE K MCMAHON	0.30	237.00	Represent Committee at hearing.
05/27/2025	B135	MICHAEL H TRAISSON	1.00	805.00	Prepare for and attend hearing re omnibus issues and follow up including review of agenda items
05/27/2025	B135	MICHELLE K MCMAHON	0.80	632.00	Prepare for and represent Committee at hearing (.4); correspond with Committee regarding case status and extension of exclusivity (.4).
06/30/2025	B135	MICHAEL H TRAISSON	0.50	402.50	Participate in omnibus hearing
06/30/2025	B135	MICHELLE K MCMAHON	0.40	316.00	Represent client at hearing and prepare email summary for Committee.
	<b>B135 Total</b>		<b>10.30</b>	<b>8,266.00</b>	
03/04/2025	B150	MICHAEL H TRAISSON	0.30	241.50	Correspondence with committee regarding status and adjournment of weekly meeting
03/10/2025	B150	MICHAEL H TRAISSON	0.20	161.00	Correspondence from attorney representing claimant and follow up to same
03/11/2025	B150	MICHAEL H TRAISSON	0.30	241.50	Correspondence to counsel for unsecured creditor regarding necessity of closing the estate and resolving issues
03/12/2025	B150	MICHAEL H TRAISSON	0.80	644.00	Correspondence with Creditor regarding issues, pertaining to settlement of claims to earmarked funds and research same
03/14/2025	B150	MICHAEL H TRAISSON	1.00	805.00	Research and consideration of accounts, commingling and claims; correspondence with counsel to Creditor; preparation and drafting of memo outlining law
03/17/2025	B150	MICHAEL H TRAISSON	0.30	241.50	Call from creditor regarding status of case, insurance issues and update
03/19/2025	B150	MICHAEL H TRAISSON	0.30	241.50	Committee communications to and from creditors committee and chairperson
03/19/2025	B150	MICHAEL H TRAISSON	0.40	322.00	Correspondence from Creditor Sandra Bryant, with questions of challenge to claim moving claim from priority to unsecured; response regarding same and explanation of role of committee in representing all creditors and efforts to coordinate with debtor in possession.
03/19/2025	B150	MICHAEL H TRAISSON	0.20	161.00	Correspondence from local counsel regarding communications from Creditor and referral of question to committee counsel
03/24/2025	B150	MICHAEL H TRAISSON	0.40	322.00	Correspondence from Clay Taylor and correspondence to plaintiff creditors responding to fact questions.
03/27/2025	B150	MICHAEL H TRAISSON	0.30	241.50	Telephone call and conference from and involving counsel for a creditor with regard to its claim in the case
03/31/2025	B150	MICHAEL H TRAISSON	0.40	322.00	Preparation for tomorrow's Creditor committee meeting, and reports
03/31/2025	B150	MICHELLE K MCMAHON	1.00	790.00	Review correspondence from Debtors and prepare update for Committee meeting (.7); teleconference with M. Traison regarding case status and strategy (.3).
04/01/2025	B150	MICHAEL H TRAISSON	0.80	644.00	Prepare for, attend, and conduct meeting of Creditor's committee, including notices and correspondence from and two members of committee
04/01/2025	B150	MICHELLE K MCMAHON	0.50	395.00	Prepare for and participate in Committee meeting.
04/02/2025	B150	MICHAEL H TRAISSON	0.80	644.00	Prepare for and attend conference call re Hopp estate claim and with debtor legal counsel and with creditor counsel
04/08/2025	B150	MICHAEL H TRAISSON	0.30	241.50	Conference call with province regarding financial advisor input and Update, instead of Creditor community meeting today; review of possible assets; update regarding claims
04/22/2025	B150	MICHAEL H TRAISSON	1.00	805.00	Attend regular Creditor committee meeting. Preparation, examine reports of financial advisor

Date	Billing Code	Name	Hours	Amount	Narrative
04/22/2025	B150	MICHELLE K MCMAHON	0.30	237.00	Draft agenda for and participate in Committee meeting.
05/19/2025	B150	MICHAEL H TRAISSON	0.30	241.50	Attention to regular Creditor committee meeting
05/27/2025	B150	MICHELLE K MCMAHON	0.80	632.00	Prepare agenda for, prepare for and meeting with Committee (.5); correspond with the Committee regarding case status and exclusivity (.3).
06/10/2025	B150	MICHAEL H TRAISSON	1.50	1,207.50	Correspondence from attorney Taylor together with documentation for settlement of half estate claim; review of settlement agreement, and motion for compromise; communications with creditors, soliciting comments, and modification; consideration and recommendation for committee
06/24/2025	B150	MICHAEL H TRAISSON	0.30	241.50	Multiple correspondence with creditor counsel and transmission of revised agreement and motion for order authorizing settlement; work on resolving outstanding issues
	<b>B150 Total</b>		<b>12.50</b>	<b>10,023.50</b>	
03/03/2025	B160	KYRIAKI CHRISTODOULOU	0.70	287.00	Confer with team and review numbers internally re: possible outstanding balance. Reconcile/balance payments to invoices.
03/20/2025	B160	KYRIAKI CHRISTODOULOU	5.50	2,255.00	Draft second interim fee application. Finalize numbers.
03/21/2025	B160	KYRIAKI CHRISTODOULOU	0.50	205.00	Confer with MT and committee to finalize fee application. Circulate final materials to local counsel for filing.
03/21/2025	B160	KYRIAKI CHRISTODOULOU	0.90	369.00	Finalize fee application by conferring with team re: February payment, sending to Committee for approval, revising draft, and drafting notice of hearing.
03/27/2025	B160	KYRIAKI CHRISTODOULOU	0.80	328.00	Review Province fee application. Coordinate obtaining committee approval and submit for filing.
04/22/2025	B160	KYRIAKI CHRISTODOULOU	0.20	82.00	Review Province second interim fee application and circulate to local counsel for filing.
05/28/2025	B160	KYRIAKI CHRISTODOULOU	0.20	82.00	Circulate order approving Province's second interim fee application to local counsel for filing.
05/28/2025	B160	KYRIAKI CHRISTODOULOU	0.70	287.00	Review and revise proposed order approving Province's second interim fee application. Circulate to Province for review.
	<b>B160 Total</b>		<b>9.50</b>	<b>3,895.00</b>	
03/03/2025	B205	MICHAEL H TRAISSON	1.00	805.00	Correspondence from Debtor in Possession counsel and work facilitating settlement regarding \$1.6 million escrow claim dispute
03/04/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Correspondence from debtor and its motion establishing procedures for de minimus asset sales
03/04/2025	B205	MICHAEL H TRAISSON	0.50	402.50	Correspondence from Laura Castagna with questions in response to my earlier correspondence, and outline and explanation of issues and telephone call from Mr. Richards
03/04/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Receipt and review of application for approval of step and proposed order regarding resolution of turnover of funds and deferred compensation plan notice of hearing
03/04/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Repeat correspondence with Laura Castagna regarding escrow and follow up to Debtor in Possession request
03/05/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Debtor in Possession legal counsel re Christian Horizons - Motion for Sale of De Minimis Assets Under Section 363
03/06/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Debtor in Possession legal counsel with proposed amendments to the DIP financing order and review of same and response
03/07/2025	B205	MICHAEL H TRAISSON	0.40	322.00	Attention to Debtor in Possession proposed budget
03/10/2025	B205	MICHAEL H TRAISSON	0.60	483.00	Receipt of correspondence from DIP regarding settlement of claim to allegedly escrowed funds; follow up and correspondence to attorney representing claimant.
03/10/2025	B205	MICHELLE K MCMAHON	0.60	474.00	Correspond with Debtors' counsel and Province regarding revisions to DIP agreement.

Date	Billing Code	Name	Hours	Amount	Narrative
03/11/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Receipt and review of response from legal counsel to the DIP regarding request for information
03/11/2025	B205	MICHAEL H TRAISSON	0.60	483.00	Responsive correspondence from attorney for Hopp estate regarding settlement possibilities with secured creditor and analysis of claim and follow up with request for documentation and request correspondence made to Debtor in Possession legal counsel
03/13/2025	B205	MICHAEL H TRAISSON	1.00	805.00	Research regarding third-party payment to debtor in possession and mingling with General account subject to secured party claim
03/14/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Correspondence from committee financial advisor regarding analysis of Debtor in Possession financing issues
03/20/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Follow up correspondence to Debtor in Possession legal counsel re creditor claims
03/24/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Call with Debtor in Possession legal counsel regarding various issues; preparation for hearing agenda; escrow money issues
03/24/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Telephone Debtor in Possession counsel responding to request for information regarding insurance reimbursement and claims and discuss same
03/28/2025	B205	MICHAEL H TRAISSON	0.80	644.00	Correspondence and calls with Lora Castagna and with bankruptcy specialist regarding research results claims commingling results of Conference Call with debtor and work on supplying citations and arranging call with Debtor in Possession attorney
03/28/2025	B205	MICHAEL H TRAISSON	0.60	483.00	Zoom meeting with legal counsel to the debtor and possession regarding the Hopp estate claim; correspondence and calls to attorney for Hopp
03/31/2025	B205	MICHAEL H TRAISSON	1.00	805.00	Receipt and review of extension of DIP financing agreements and modifications according to prior communications; and responses
04/01/2025	B205	MICHAEL H TRAISSON	0.80	644.00	Correspondence and exchanges with Hopp estate and arranging for informational meeting with the debtor in possession
04/03/2025	B205	MICHAEL H TRAISSON	0.50	402.50	Correspondence from Debtor in possession, legal counsel and examination of insurance
04/07/2025	B205	MICHAEL H TRAISSON	0.90	724.50	Receipt and review of second amendment to Debtor in Possession credit agreement and correspondence from Bondholders counsel
04/08/2025	B205	MICHAEL H TRAISSON	0.50	402.50	Receipt and review of extensive memorandum, prepared by financial advisors regarding debtor in possession, liens, post, petition liens, and insurance proceeds; consideration of same and consult with co-counsel
04/08/2025	B205	MICHAEL H TRAISSON	1.20	966.00	Review of Second Amended Debtor in Possession financing statement and call from Mr. Richards regarding approval of same; regarding settlement and progress with regard to creditor claim
04/08/2025	B205	MICHELLE K MCMAHON	0.20	158.00	Review DIP amendment and correspond with M. Traisson regarding changes.
04/10/2025	B205	MICHAEL H TRAISSON	1.00	805.00	Correspondence from Hopp estate legal Counsel regarding claims and response to settlement proposals and arguments regarding trust and correspondence to debtor in possession legal counsel all aimed at resolution of \$1.6 million claim
04/14/2025	B205	MICHAEL H TRAISSON	0.80	644.00	Attention to Hopp estate claim; correspondence to and from Debtor in Possession legal counsel and correspondence to and from Mr. Blythe. Report to Lora Castagna attorney for estate.
04/18/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Correspondence from legal counsel to Debtor in Possession and response to same
05/01/2025	B205	MICHAEL H TRAISSON	1.00	805.00	Correspondence from Debtor in Possession counsel; BEH document examination and status report
05/05/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Receipt in review of Debtor in Possession motion to eject certain executory contracts; notice of hearing and attention to administrative matters
05/08/2025	B205	MICHAEL H TRAISSON	0.40	322.00	Correspondence from and to DIP legal counsel regarding Hopp estate matter and correspondence from and to Laura Castagna regarding same



Date	Billing Code	Name	Hours	Amount	Narrative
05/08/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Receipt and examination of correspondence and exhibits from Debtor in Possession legal counsel regarding status of HUD matter
05/09/2025	B205	MICHAEL H TRAISSON	0.60	483.00	Correspondence from Hopp estate attorney and correspondence to bondholder and response from Eric
05/12/2025	B205	MICHAEL H TRAISSON	1.50	1,207.50	Examination of docket and receipt and review of DIP applications for compensation; notifications to committee; preparation for next week's omnibus hearing
05/22/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Correspondence from Debtor in Possession legal counsel re APA remnant assets seeking approval of committee
05/22/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Correspondence to Debtor in Possession legal counsel re approval; follow up from debtor re approval of non-contested docket items
05/22/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Review of agreement and consider approval or critique
05/23/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Debtor in Possession legal counsel re HUD approval
05/27/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Correspondence from DIP counsel for Midwest regarding extension of exclusivity. And response to same and consideration of request.
06/02/2025	B205	MICHAEL H TRAISSON	0.40	322.00	Received and review of inquiry from creditor regarding lease payment and correspondence to Debtor in Possession re same
06/06/2025	B205	MICHAEL H TRAISSON	0.80	644.00	Inquiry by creditor; correspondence To Debtor in Possession legal counsel, follow up
06/12/2025	B205	MICHAEL H TRAISSON	0.80	644.00	Multiple correspondence from legal counsel Debtor in Possession to Salachek regarding breach of contract and commitment to purchase; review of documentation and advice to council regarding committee position.
06/13/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Debtor in Possession legal counsel re breach of sale commitment; correspondence from legal counsel for bond holders and response
06/13/2025	B205	MICHAEL H TRAISSON	0.20	161.00	Response from attorney Wilson
06/17/2025	B205	MICHAEL H TRAISSON	2.50	2,012.50	Correspondence from attorney for Hopp estate and review analysis of term sheet and settlement terms and consider same; responsive correspondence to attorney for Hopp; comments and correspondence to bondholder counsel and Debtor in Possession counsel; exchanges of correspondence and continued negotiations with both parties; responses from DIP legal counsel and replies and work on settlement
06/17/2025	B205	MICHAEL H TRAISSON	0.60	483.00	Correspondence from DIP legal counsel regarding remnant asset sale and notice to sell to a alternative buyers and notice to purchaser to preserve documents and intent to litigate for deficiency; examine response of buyers counsel
06/18/2025	B205	MICHAEL H TRAISSON	1.50	1,207.50	Multiple correspondence with bondholder, trustee counsel, and debtor in possession, legal counsel, and with counsel for the estate, endeavoring to resolve and settle the matter; delayed response from estate counsel; reply to him explaining; call from Clay Taylor; draft additional response
06/19/2025	B205	MICHAEL H TRAISSON	1.00	805.00	Correspondence from Debtor in Possession legal counsel with pleadings including complaint re adversary proceeding against remnant buyers
06/20/2025	B205	MICHAEL H TRAISSON	0.80	644.00	Correspondence from Jim Finnegan regarding the hop estate; responsive correspondence; correspondence to bondholder, trustee, legal counsel, and debtor counsel and work on settlement
06/27/2025	B205	MICHAEL H TRAISSON	0.40	322.00	Correspondence from DIP legal counsel regarding hearings and exchanges of correspondence Re omnibus hearing
06/30/2025	B205	MICHAEL H TRAISSON	0.30	241.50	Correspondence from Debtor in Possession legal counsel Re status of settlement and response to Mr. Richards and to bondholder trustee counsel
	<b>B205 Total</b>		<b>30.60</b>	<b>24,621.00</b>	
03/07/2025	B230	MICHELLE K MCMAHON	0.30	237.00	Review revised DIP order and budget and correspond with Committee processonals and Debtors regarding proposed terms.

Date	Billing Code	Name	Hours	Amount	Narrative
03/14/2025	B230	MICHELLE K MCMAHON	0.40	316.00	Review correspondence regarding terms for extended DIP financing and correspond with Committee professionals and Debtors' counsel.
	<b>B230 Total</b>		<b>0.70</b>	<b>553.00</b>	
03/12/2025	B310	SHARLENE CUBELO	5.00	875.00	In response to the request of Debtor and Secured Creditor, researched how Illinois and Missouri courts treat and allocate settlement funds intended to benefit a personal injury claimant, but were commingled in a bank account secured by a lien.
03/13/2025	B310	SHARLENE CUBELO	2.40	420.00	In response to the request of Debtor and Secured Creditor and based on further research guidance provided by M. Traison, researched cases and laws in federal and state courts addressing the competing ownership interests in funds as between a secured and unsecured creditor, when such funds were intended for the benefit of the unsecured creditor but were commingled by a debtor in a bank account subject to a secured creditor's lien.
03/14/2025	B310	SHARLENE CUBELO	4.60	805.00	In response to the request of Debtor and Secured Creditor, researched Missouri, Illinois, and Seventh and Eighth Circuit cases in which unsecured creditors sought to impose a constructive trust on settlement funds that were intended for their benefit but were wrongfully commingled in a debtor's general bank account.
03/17/2025	B310	SHARLENE CUBELO	1.00	175.00	In response to the request of Debtor and Secured Creditor and based on further research guidance provided by M. McMahon, researched Illinois and Missouri cases deciding whether or not to impose a constructive trust on personal injury settlement funds that were commingled in the debtor's general bank account.
03/18/2025	B310	SHARLENE CUBELO	0.30	52.50	Drafted a preliminary outline in preparation for a research memorandum summarizing the viability of claims available to the Estate to recover the commingled settlement funds, in connection with facilitating a resolution regarding the disputed funds as requested by Debtor and Secured Creditor.
03/19/2025	B310	SHARLENE CUBELO	0.70	122.50	Drafted a summary of relevant facts in the research memorandum requested by Debtor and Secured Creditor.
03/19/2025	B310	SHARLENE CUBELO	1.50	262.50	In connection with the research memorandum requested by Debtor and Secured Creditor, reviewed and analyzed constructive trust laws imposed by Illinois courts to determine whether the Estate can satisfy the differing requirements under Illinois law.
03/19/2025	B310	SHARLENE CUBELO	1.30	227.50	In connection with the research memorandum requested by Debtor and Secured Creditor, reviewed and analyzed constructive trust laws imposed by Missouri courts to determine whether the Estate can satisfy Missouri's requirements.
03/19/2025	B310	SHARLENE CUBELO	0.60	105.00	In connection with the research memorandum requested by Debtor and Secured Creditor, reviewed and analyzed Missouri, Illinois, and Seventh and Eighth Circuit cases to confirm state law governs when resolving issues of constructive trusts.
03/19/2025	B310	SHARLENE CUBELO	0.80	140.00	In connection with the research memorandum requested by Debtor and Secured Creditor, reviewed and analyzed Missouri, Illinois, and Seventh and Eighth Circuit cases to determine whether the Estate is likely to prevail on the separate legal theory of unjust enrichment.
03/19/2025	B310	SHARLENE CUBELO	0.30	52.50	In the research memorandum requested by Debtor and Secured Creditor, drafted a brief analysis identifying Missouri and Illinois as the applicable state law.
03/19/2025	B310	SHARLENE CUBELO	0.20	35.00	In the research memorandum requested by Debtor and Secured Creditor, drafted the Issue Presented section to concisely frame the legal question regarding the issue of the commingled funds.



Date	Billing Code	Name	Hours	Amount	Narrative
03/19/2025	B310	SHARLENE CUBELO	0.50	87.50	In the research memorandum requested by Debtor and Secured Creditor, drafted the Summary Conclusion section to provide a high-level answer to the legal issue presented regarding the question of the commingled funds.
03/19/2025	B310	SHARLENE CUBELO	0.80	140.00	Reviewed and analyzed the following documents in order to determine the relevant facts to be included and relied upon in the research memorandum requested by Debtor and Secured Creditor: the indemnity reimbursement request letter dated 06/04/2024; correspondence between Debtor and Insurance Company from 06/2024 regarding the transfer of settlement funds to Debtor's bank account; and Debtor's bank account summary dated 06/30/2024 showing the transferred settlement funds.
03/20/2025	B310	SHARLENE CUBELO	2.60	455.00	In the research memorandum requested by Debtor and Secured Creditor, drafted a summary and analysis regarding the differing tracing requirements imposed by Missouri and Illinois courts, and the Estate's likelihood of satisfying such tracing requirements.
03/20/2025	B310	SHARLENE CUBELO	1.40	245.00	In the research memorandum requested by Debtor and Secured Creditor, drafted a summary and analysis regarding the Estate's inability to satisfy the fraud element generally required by Missouri and Illinois courts.
03/20/2025	B310	SHARLENE CUBELO	0.50	87.50	In the research memorandum requested by Debtor and Secured Creditor, drafted a summary of legal principles pertaining to constructive trusts which are generally shared by Missouri and Illinois courts.
03/20/2025	B310	SHARLENE CUBELO	0.50	87.50	In the research memorandum requested by Debtor and Secured Creditor, drafted an analysis regarding the Estate's likelihood of success on an unjust enrichment theory.
03/20/2025	B310	SHARLENE CUBELO	0.40	70.00	In the research memorandum requested by Debtor and Secured Creditor, drafted the Conclusion section to summarize the outcome of a constructive trust and unjust enrichment claim by the Estate and to identify further research and recommendations for next steps.
03/21/2025	B310	SHARLENE CUBELO	1.80	315.00	In connection with the research memorandum requested by Debtor and Secured Creditor, reviewed and analyzed Missouri and Illinois cases to determine whether the Estate may argue that fraud should not be considered a necessary element to impose a constructive trust.
03/21/2025	B310	SHARLENE CUBELO	1.20	210.00	In connection with the research memorandum requested by Debtor and Secured Creditor, reviewed and analyzed Missouri, Illinois, New York, Seventh and Eighth Circuit cases to determine whether the Estate has an ownership claim over the commingled funds based on contract and agency theories.
03/21/2025	B310	SHARLENE CUBELO	1.40	245.00	Revised the research memorandum requested by Debtor and Secured Creditor to include a discussion of cases and legal positions the Estate may argue in order to overcome the fraud element generally required by Missouri and Illinois courts.
03/21/2025	B310	SHARLENE CUBELO	1.10	192.50	Revised the research memorandum requested by Debtor and Secured Creditor to include an analysis regarding the Estate's likelihood of success to recover the commingled funds under contract and agency principles.
03/28/2025	B310	SHARLENE CUBELO	0.40	70.00	In response to a request by M. Traison, prepared a list of cases cited in the research memorandum to be delivered to the attorney of the Estate.
06/11/2025	B310	MICHELLE K MCMAHON	0.30	237.00	Review claim settlement agreement and draft motion and correspond with M. Traison regarding settlement.
	<b>B310 Total</b>		<b>31.60</b>	<b>5,714.50</b>	
06/03/2025	B330	KYRIAKI CHRISTODOULOU	0.80	328.00	Accounting and reviewing payments and balance and correspondence with team throughout the day to discuss.

Date	Billing Code	Name	Hours	Amount	Narrative
06/03/2025	B330	KYRIAKI CHRISTODOULOU	0.30	123.00	Review order approving second interim fee application. Review and compare cash received with balance. Work with staff to circulate May invoice for service.
	<b>B330 Total</b>		<b>1.10</b>	<b>451.00</b>	
06/30/2025	B470	MICHAEL H TRAISSON	0.40	322.00	Correspondence to and from chairperson of committee regarding administrative matters and governance and committee deliberations
	<b>B470 Total</b>		<b>0.40</b>	<b>322.00</b>	
	<b>Grand Total</b>		<b>152.40</b>	<b>97,325.50</b>	

## **Exhibit G**

### **Expense Summary**

<b>Expense Summary Date</b>	<b>Description</b>	<b>Vendor</b>	<b>Amount</b>
4/10/2025	On-Line Research	RELX INC. d/b/a LexisNexis	\$5.12
5/8/2025	On-Line Research	RELX INC. d/b/a LexisNexis	\$2.97
		<b>Total:</b>	<b>\$8.09</b>