

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

**MONTHLY FEE STATEMENT COVER SHEET FOR THE PERIOD
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025**

Debtor: Powin, LLC, et al. Applicant: Genova Burns LLC
Case No.: 25-16137 (MBK) Client: Unsecured Creditors Committee
Chapter: 11 Case Filed: June 10, 2025

**SECTION 1
FEE SUMMARY**

X Monthly Fee Statement No. 4 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from October 1, 2025 through October 31, 2025
(the "Fourth Statement Period")

Total Fees: \$ 55,517.50
Total Disbursements: \$ 857.21
Minus 20% holdback of Fees: \$ 11,103.50
Amount Sought at this Time: \$ 45,271.21

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years Of Professional Service)	HOURS	RATE	FEE
1. Daniel M. Stolz, Partner	1980	39.30	900.00	\$35,370.00
2. Donald W. Clarke, Partner	2008	15.80	700.00	\$11,060.00
3. Donald W. Clarke, Partner	2008	3.00	350.00	\$1,050.00
4. Scott S. Rever, Partner	1994	1.70	700.00	\$1,190.00
5. Susan S. Long, Counsel	2007	9.60	550.00	\$5,280.00
6. Lorrie Denson	Paralegal	5.70	275.00	\$1,567.50

Fee Totals: \$ 55,517.50
Disbursements Totals: \$ 857.21
Total Fee Application \$ 56,374.71



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**SECTION II SUMMARY
OF SERVICES**

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) Asset Disposition Sales, leases, abandonment and related transaction work.		
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.		
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	53.10	41,325.00
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	8.70	4,152.50
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others.		
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter).		
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.		
m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	10.30	8,990.00

SERVICES RENDERED	HOURS	FEE
n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362.		
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.		
t) Reconstruction Accounting Reconstructing books and records from past transactions and brining accounting current.		
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.		
v) Valuation Appraise or review appraisals of assets.		
w) Travel Time	3.00	1,050.00
SERVICE TOTALS:	75.10	\$55,517.50

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	9.09
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	12.00
d) Fax Include per page fee charged.	
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.	
f) In-house Reproduction Services Exclusive of overhead charges.	
g) Outside Reproduction Services Including scanning services.	
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	
i) Court Reporting Transcripts.	
j) Travel Mileage, tolls, airfare, parking.	7.75
k) Courier & Express Carriers Overnight and personal delivery.	
l) Postage	
m) Other (specify) Professional BMC Group	828.37
DISBURSEMENTS TOTAL:	\$857.21

I certify under penalty of perjury that the above is true.

Date: November 12, 2025

/s/ Daniel M. Stolz

DANIEL M. STOLZ

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Susan A. Long, Esq. Jaclynn N. McDonnell, Esq. dstolz@genovaburns.com dclarke@genovaburns.com slong@genovaburns.com jmcdonnell@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 533-0777 Fax: (973) 814-4045 <i>Local Counsel for the Official Committee of Unsecured Creditors</i>	BROWN RUDNICK LLP Robert J. Stark, Esq. Kenneth J. Aulet, Esq. Bennett S. Silverberg, Esq. Jeffrey L. Jonas, Esq. rstark@brownrudnick.com kaulet@brownrudnick.com bsilverberg@brownrudnick.com jjonas@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 <i>Counsel for the Official Committee of Unsecured Creditors</i>
In re: POWIN, LLC, <i>et al.</i> , ¹ Debtor.	Chapter 11 Case No.: 25-16137 (MBK) (Jointly Administered) Honorable Michael B. Kaplan

**FOURTH MONTHLY FEE STATEMENT OF GENOVA BURNS LLC, LOCAL
COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025**

Genova Burns LLC (“Genova”) submits this Fourth Monthly Fee Statement for Services Rendered and Expenses Incurred as Local Counsel to the Official Committee of Unsecured Creditors (the “Statement”) for the period commencing October 1, 2025 and ending October 31, 2025 (the “Statement Period”), pursuant to the Administrative Fee Order Establishing Procedures for Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court entered on July 25, 2025 (the “Interim Compensation Order”).

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; (ix) Powin Energy Operating, LLC [6487]; (x) Powin Energy Storage 2, Inc. [9926]; (xi) Powin Energy Ontario Storage II LP [5787]; (xii) Powin Canada B.C. Ltd. [2239]. The Debtors’ mailing address is 20550 SW 115th Avenue, Tualatin, OR 97062.

The billing invoices for the Statement Period are annexed hereto as Exhibit “A”. These invoices detail the services performed. A detailed breakdown of all out-of-pocket disbursements necessarily incurred by Genova is annexed as Exhibit “B”. The fees sought in the within Statement Period is as follows:

Fees	Less 20%	Fee Payment Requested	Expense Reimbursement (100%)
\$55,517.50	(\$11,103.50)	\$44,414.00	\$857.21

WHEREFORE, Genova respectfully requests interim payment of fees for this Statement Period in the sum \$44,414.00, together with expenses of \$857.21, for a total requested interim payment of \$45,271.21, in accordance with the terms of the Interim Compensation Orders.

**GENOVA BURNS LLC
LOCAL COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**

Dated: November 12, 2025

By: /s/ Daniel M. Stolz
DANIEL M. STOLZ

EXHIBIT A

GENOVA BURNS LLC

October 31, 2025
Invoice No.: 539767

PROFESSIONAL SERVICES RENDERED

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/01/25	DMS	B110	Review investigation report.	.50	900.00	450.00
10/01/25	DMS	B110	Creditor Committee call.	1.70	900.00	1,530.00
10/01/25	DMS	B110	Review 90 day and one year transfers.	.70	900.00	630.00
10/01/25	DMS	B110	Review slide deck regarding investigation.	.20	900.00	180.00
10/01/25	DWC	B110	Committee conference call with all professionals	1.70	700.00	1,190.00
10/01/25	SSL	B110	Emails from/to DMS regarding 90 day payments. Review and forward of same.	.30	550.00	165.00
10/01/25	SSL	B110	Review email from Ken Aulet of BR to committee listserv forwarding slide deck regarding investigation.	.10	550.00	55.00
10/03/25	DMS	B110	Creditor Committee pre-call with creditor committee professionals.	.40	900.00	360.00
10/03/25	DMS	B110	Research 503 reclamation claim and send to Aulet.	.50	900.00	450.00
10/03/25	DMS	B160	Process CNO's for BR and A&M.	.30	900.00	270.00
10/03/25	DMS	B320	Emails with DWC and SSL regarding plan procedure motion and solicitation documents.	.30	900.00	270.00
10/03/25	DMS	B110	Email regarding removal ext. motion.	.30	900.00	270.00
10/03/25	DMS	B320	Emails with DWC regarding Plan motion.	.30	900.00	270.00
10/03/25	DMS	B110	Review Court Order regarding shutdown.	.20	900.00	180.00
10/03/25	DMS	B320	Emails regarding liquidity and Plan funding.	.30	900.00	270.00
10/03/25	DMS	B110	Review Motion to compel abandonment.	.20	900.00	180.00
10/03/25	DWC	B110	Committee precall with professionals	.50	700.00	350.00
10/03/25	DWC	B160	Coordinate filing on CNO for fee statement by A&M	.20	700.00	140.00
10/03/25	DWC	B110	Update DMS on status of plan and related doc prep	.20	700.00	140.00

GENOVA BURNS LLC

October 31, 2025
Invoice No.: 539767

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/03/25	DWC	B110	Coordinate participation in weekend call with debtor to update committee on waterfall analysis	.20	700.00	140.00
10/03/25	LD	B160	Prepare and file CNO re A&M August fee statement.	.50	275.00	137.50
10/03/25	SSL	B320	Review emails between DMS and DWC regarding status of plan.	.20	550.00	110.00
10/04/25	DMS	B110	Review Motion to extend time on leases.	.20	900.00	180.00
10/04/25	DWC	B110	Liquidity call with committee and debtor professionals	.80	700.00	560.00
10/06/25	DMS	B320	Review revised Plan and emails with Aulet regarding same.	.70	900.00	630.00
10/06/25	DMS	B110	Creditor Committee call.	.60	900.00	540.00
10/06/25	DMS	B110	Research regarding new value and emails regarding same.	.70	900.00	630.00
10/06/25	DMS	B320	Review Plan and solicit package and emails with DWC regarding same.	.80	900.00	720.00
10/06/25	DMS	B320	Emails with Aulet and Creditor Committee regarding Plan process.	.50	900.00	450.00
10/06/25	DMS	B110	Email with A&M regarding fee estimate.	.20	900.00	180.00
10/06/25	DMS	B110	Review draft Order regarding confidential information and comments.	.30	900.00	270.00
10/06/25	DMS	B110	Email with Aulet regarding liquidating trustee.	.20	900.00	180.00
10/06/25	SSR	B110	Met with DMS regarding research on new value defense and paid new value determined as of petition date and doesn't account for post petition payment.	.20	700.00	140.00
10/06/25	SSR	B110	Research regarding the above.	1.50	700.00	1,050.00
10/06/25	DWC	B110	Discuss plan and disclosure formatting re release language; prep A&M fee statement filing	.40	700.00	280.00
10/06/25	DWC	B110	Review solicitation materials and draft motion for protective order; provide comment and edits	2.10	700.00	1,470.00

GENOVA BURNS LLC

October 31, 2025
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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/06/25	LD	B160	File and arrange for service of A&M September fee statement.	.50	275.00	137.50
10/06/25	LD	B110	Revise and reformat draft order for entry of protective order.	.30	275.00	82.50
10/06/25	LD	B110	Call with SL re monthly statements procedures.	.20	275.00	55.00
10/06/25	SSL	B320	Email from Ken Aulet of BR forwarding combined DS and Plan draft to committee listserv for review.	.20	550.00	110.00
10/06/25	SSL	B110	Review email from Matthew Sawyer of BR to committee listserv forwarding agenda for call.	.10	550.00	55.00
10/06/25	SSL	B160	Emails from Bijal Desai and DWC regarding monthly fee statement. Review of same. Receipt/review ECF confirmation of filing.	.50	550.00	275.00
10/06/25	SSL	B110	Review email from Ken Aulet of BR to committee listserv regarding plan filing.	.10	550.00	55.00
10/06/25	SSL	B320	Receipt/review ECF notice plan and joint disclosure statement have been filed.	.10	550.00	55.00
10/07/25	DMS	B110	Review Notice of Hearing and emails regarding same.	.30	900.00	270.00
10/07/25	DMS	B110	Emails with Aulet and DWC regarding October 10th hearing.	.30	900.00	270.00
10/07/25	DMS	B110	Emails regarding October 8th creditor committee meeting.	.30	900.00	270.00
10/07/25	DMS	B110	Review Motion to reject.	.20	900.00	180.00
10/07/25	DMS	B110	Emails to Greg B. et al regarding landlord and timeline.	.30	900.00	270.00
10/07/25	DMS	B110	Email with LD regarding information for petition.	.20	900.00	180.00
10/07/25	DMS	B110	Review Greg B update.	.20	900.00	180.00
10/07/25	DMS	B110	Review Joint Stipulation regarding rejections.	.20	900.00	180.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/07/25	DWC	B110	Coordinate appearance for conditional approval of disclosure statement	.30	700.00	210.00
10/07/25	LD	B160	File CNO for BR August fee statement.	.30	275.00	82.50
10/07/25	SSL	B110	Receipt/review ECF notice of no objection to BR monthly fee statement.	.10	550.00	55.00
10/07/25	SSL	B110	Review emails from Timothy Walsh and Ken Aulet regarding committee meeting.	.10	550.00	55.00
10/08/25	DMS	B320	Email regarding Plan and Ace.	.30	900.00	270.00
10/08/25	DMS	B320	Emails with Stark and DWC regarding Creditor Committee meeting and Plan.	.30	900.00	270.00
10/08/25	DMS	B110	Emails with Turner regarding Motion revisions.	.20	900.00	180.00
10/08/25	DMS	B110	Review Application to reject customer contracts.	.20	900.00	180.00
10/08/25	LD	B110	Edit captions of motions for protective order.	.20	275.00	55.00
10/09/25	DMS	B110	Committee Call and follow up calls and emails.	1.50	900.00	1,350.00
10/09/25	DMS	B110	Call with DWC regarding preparation for hearings.	.30	900.00	270.00
10/09/25	DMS	B110	Email with Meyers regarding World Imports decision.	.20	900.00	180.00
10/09/25	DMS	B110	Emails with BR regarding Liquidating Trustee.	.20	900.00	180.00
10/09/25	DWC	B110	Committee meeting	1.00	700.00	700.00
10/09/25	LD	B160	Review timesheets and prepare GB September monthly fee statement.	1.00	275.00	275.00
10/09/25	SSL	B110	Emails from/to Ken Aulet of BR and Chambers of Judge Kaplan regarding appearances on disclosure statement hearing.	.30	550.00	165.00
10/10/25	DMS	B160	Review Arent retention.	.20	900.00	180.00
10/10/25	DMS	B110	Email with Aulet regarding status.	.20	900.00	180.00
10/10/25	DMS	B320	Review and discuss US Trustee objection to cond. approval of Disclosure Statement.	.50	900.00	450.00

GENOVA BURNS LLC

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/10/25	DMS	B110	Review and course professional declarations.	.20	900.00	180.00
10/10/25	DMS	B110	Calls with Aulet and Stark and Creditor Committee professionals call.	.80	900.00	720.00
10/10/25	DWC	B110	Committee professionals call	.50	700.00	350.00
10/10/25	DWC	B110	Appear at Powin conditional disclosure hearing	1.50	700.00	1,050.00
10/10/25	DWC	B195	Appear in Trenton hearing on conditional disclosure hearing	3.00	350.00	1,050.00
10/10/25	LD	B160	File COS re A&M September fee statement.	.30	275.00	82.50
10/10/25	SSL	B320	Receipt/review UST's objection to disclosure statement.	.20	550.00	110.00
10/11/25	DMS	B110	Emails with Moyron et al regarding scheduling.	.20	900.00	180.00
10/11/25	DMS	B320	Review draft Disclosure Statement Order, Confirmation Hearing notice and voting package.	.50	900.00	450.00
10/11/25	DMS	B110	Emails regarding Creditor Committee meeting.	.20	900.00	180.00
10/11/25	DMS	B110	Email with DWC regarding call with Debtor counsel.	.20	900.00	180.00
10/11/25	DMS	B110	Email with Uzzi regarding waterfall.	.20	900.00	180.00
10/11/25	DWC	B110	Coordinate appearance in trenton	.20	700.00	140.00
10/13/25	DMS	B110	Emails with Aulet regarding status of Ace agreement.	.30	900.00	270.00
10/13/25	DMS	B110	Review revised waterfall from Dentors and email with DWC.	.30	900.00	270.00
10/13/25	DMS	B110	Emails regarding fee estimates.	.20	900.00	180.00
10/13/25	DMS	B320	Emails with Togut et al regarding proposed Disclosure Statement Order and review drafts.	.40	900.00	360.00
10/13/25	DWC	B110	Update DMS on waterfall from debtor professionals	.30	700.00	210.00
10/14/25	DMS	B110	Creditor Committee meeting.	1.20	900.00	1,080.00

GENOVA BURNS LLC

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/14/25	DMS	B320	Review and circulate Plan provisions regarding Trustee and oversight committee.	.50	900.00	450.00
10/14/25	DMS	B320	Review revised Plan and solicitation documents and Order scheduling confirmation.	1.10	900.00	990.00
10/14/25	DMS	B320	Review signed Disclosure Statement Order and emails regarding same.	.30	900.00	270.00
10/14/25	DMS	B320	Emails with BR and Dentons on cover letter and Plan redrafts.	.60	900.00	540.00
10/14/25	DWC	B110	Committee meeting to discuss open issues	1.00	700.00	700.00
10/14/25	SSL	B320	Receipt/review ECF notice of entry of order approving disclosure statement.	.10	550.00	55.00
10/15/25	DMS	B160	Review and file monthly fee statement.	.20	900.00	180.00
10/15/25	DMS	B320	Review solicitation version of combined Plan and Disclosure Statement.	.70	900.00	630.00
10/15/25	DMS	B110	Review Aulet memo regarding TOC powers and emails with Creditor Committee regarding same.	.50	900.00	450.00
10/15/25	DMS	B110	Review Uzzi email regarding voting.	.10	900.00	90.00
10/15/25	DMS	B320	Review voting spreadsheets and emails regarding same.	.40	900.00	360.00
10/15/25	DMS	B110	Review Aulet report on Ace negotiation and Creditor Committee emails.	.30	900.00	270.00
10/15/25	DMS	B320	Emails regarding voting.	.30	900.00	270.00
10/15/25	DWC	B110	Conference call to discuss APA issues with Ballyshannon	1.00	700.00	700.00
10/15/25	DWC	B110	Coordinate response to A&M re questions on protocol and deadline for fee statements	.20	700.00	140.00
10/15/25	LD	B160	Finalize, file and arrange for service of GB's September monthly fee statement.	.50	275.00	137.50

GENOVA BURNS LLC

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/15/25	SSL	B160	Email from Bijal Desai of A&M regarding upcoming fee application and confirmation of deadlines. Review order on same and email with DWC. Email to Desai target date for review.	.40	550.00	220.00
10/15/25	SSL	B110	Receipt/forward Verita invoice to Ken Aulet of BR.	.10	550.00	55.00
10/15/25	SSL	B160	Receipt/review BR monthly fee statement.	.20	550.00	110.00
10/16/25	DMS	B320	Review Plan filings.	.50	900.00	450.00
10/16/25	DMS	B160	Review and file BR monthly fee statement.	.30	900.00	270.00
10/16/25	DMS	B110	Emails with Aulet regarding trust, oversight committee, etc.	.30	900.00	270.00
10/16/25	DMS	B110	Email with Sawyer regarding fees.	.20	900.00	180.00
10/16/25	DMS	B110	Emails with Aulet et al regarding composition of TOC.	.40	900.00	360.00
10/16/25	LD	B160	File BR September fee statement and arrange for service.	.50	275.00	137.50
10/16/25	SSL	B160	Emails from Matthew Sawyer of BR and LD regarding filing of BR interim fee application. Receipt/review ECF notice confirming filing of same.	.30	550.00	165.00
10/16/25	SSL	B160	Email to Bijal Desai of A&M regarding submit date for fee application to allow for review.	.20	550.00	110.00
10/17/25	DMS	B110	Creditor Committee professionals precall.	.40	900.00	360.00
10/17/25	DMS	B110	Emails with Creditor Committee members.	.30	900.00	270.00
10/17/25	DMS	B110	Email regarding composition of TOC and powers.	.70	900.00	630.00
10/17/25	DMS	B320	Review final solicitation letter and Court letter.	.20	900.00	180.00
10/17/25	DWC	B110	Professionals call in prep for committee call	.50	700.00	350.00
10/17/25	LD	B160	File COS re GB September fee statement.	.30	275.00	82.50
10/19/25	DMS	B110	Emails regarding creditor committee voting on TOC issues.	.20	900.00	180.00

GENOVA BURNS LLC

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/20/25	DMS	B110	Emails regarding oversight committee and creditor committee call.	.30	900.00	270.00
10/20/25	DMS	B160	Emails with Creditor Committee professionals regarding fee applications.	.30	900.00	270.00
10/20/25	DMS	B110	More emails regarding oversight committee.	.40	900.00	360.00
10/20/25	DMS	B110	Emails with A&M regarding CNO and payment.	.20	900.00	180.00
10/20/25	DMS	B110	Review Chase setoff motion.	.20	900.00	180.00
10/20/25	DMS	B110	Review Ad Hoc Committee motion to compel.	.20	900.00	180.00
10/20/25	LD	B160	File COS re BR September fee statement.	.30	275.00	82.50
10/20/25	SSL	B160	Emails from/to Bijal Desai of A&M regarding deadline for fee applications submission.	.20	550.00	110.00
10/20/25	SSL	B160	Receipt/review ECF notice of COS on BR monthly fee statement.	.10	550.00	55.00
10/21/25	DMS	B110	Review Aulet emails and reply regarding LT.	.30	900.00	270.00
10/21/25	DMS	B110	Review Ad Hoc motion to compel.	.20	900.00	180.00
10/21/25	DMS	B110	Wrote to Creditors Committee regarding expense reimbursement.	.20	900.00	180.00
10/21/25	DMS	B110	Research Creditor Committee expenses.	.30	900.00	270.00
10/21/25	DMS	B110	Review agenda for October 23rd and email with DWC regarding coverage.	.30	900.00	270.00
10/21/25	DMS	B110	Review rejection orders.	.20	900.00	180.00
10/21/25	DWC	B110	Discuss and coordinate coverage for hearing on motion to compel filed by interested parties	.20	700.00	140.00
10/22/25	DMS	B110	Review Motion for Protective Order and emails with DWC and BR regarding same.	.70	900.00	630.00
10/22/25	DMS	B110	Review US Trustee objection and reservation of rights.	.20	900.00	180.00

GENOVA BURNS LLC

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/22/25	DWC	B110	Rvw and revise draft motion for protective order; counsel client on hearing timing and available dates and request input	1.70	700.00	1,190.00
10/22/25	DWC	B110	Confirm access with chambers	.20	700.00	140.00
10/22/25	SSL	B110	Emails from/to Ken Aulet of BR, DMS, and Chambers of Judge Kaplan regarding appearances at hearing.	.30	550.00	165.00
10/22/25	SSL	B110	Review emails between DWC and client regarding motion for protective order.	.20	550.00	110.00
10/22/25	SSL	B110	Emails from/to DWC regarding appearance at hearing. Email to Chambers of Judge Kaplan requesting presenter status for DWC.	.20	550.00	110.00
10/23/25	DMS	B110	More emails with BR and DWC regarding Motion for Protective Order.	.30	900.00	270.00
10/23/25	DMS	B110	Review Amp joinder.	.20	900.00	180.00
10/23/25	DMS	B110	Emails regarding Protective Order procedure.	.40	900.00	360.00
10/23/25	DMS	B110	Research powers of Post Confirmation Committee.	.30	900.00	270.00
10/23/25	DWC	B110	Discuss revision of motion to application in lieu and potential hearing dates	.20	700.00	140.00
10/23/25	SSL	B110	Emails from/to DWC and Chambers of Judge Kaplan regarding appearance by DWC.	.10	550.00	55.00
10/23/25	SSL	B110	Emails from/to BR team, DWC, and DMS regarding motion for protective order. Call with Chambers of Judge Kaplan regarding motion with shortened time versus application with 7 day deadline.	.80	550.00	440.00
10/24/25	DMS	B110	More emails regarding Motion for Protective Order.	.30	900.00	270.00
10/24/25	DMS	B110	Review draft trust agreements and comment.	.60	900.00	540.00
10/24/25	DMS	B110	Creditor Committee call to interview Gleason, etc.	1.00	900.00	900.00
10/24/25	DMS	B110	Review Ribero email regarding retainer to KBF.	.20	900.00	180.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/24/25	DMS	B110	Review revised Protective Order pleadings.	.20	900.00	180.00
10/24/25	DWC	B110	Coordinate with cocounsel on revisions to motion for a protective order	.70	700.00	490.00
10/24/25	SSL	B110	Emails from/to Daniel Sachs of BR regarding status of application on protective order.	.10	550.00	55.00
10/24/25	SSL	B110	Review emails from Ken Aulet of BR to committee listserv regarding draft liquidating trust.	.10	550.00	55.00
10/24/25	SSL	B110	Calls with DWC regard application to enter protective order. Convert motion to application. Multiple emails to/from BR team for review. Review DWC comments to team. Edits to same.	1.40	550.00	770.00
10/24/25	SSL	B110	Reformat of protective order and exhibit to confirm to local rules and form.	1.60	550.00	880.00
10/24/25	SSL	B110	File and arrange service of application for entry of protective order. Email Chambers of Judge Kaplan courtesy copy.	.50	550.00	275.00
10/27/25	DMS	B110	Emails regarding KBF retainer.	.20	900.00	180.00
10/27/25	DMS	B110	Emails regarding Clyde and Company.	.20	900.00	180.00
10/27/25	DMS	B110	Review Flexgen letter demand and email regarding same.	.40	900.00	360.00
10/27/25	DMS	B110	Emails regarding OCP payments.	.20	900.00	180.00
10/27/25	DMS	B110	Review Latham letter regarding Flexgen claims and email regarding same.	.30	900.00	270.00
10/27/25	DMS	B160	Review Togut fee statement.	.20	900.00	180.00
10/27/25	SSL	B110	Confirmation email from Chambers of Judge Kaplan acknowledging receipt of application for protective order and 7 day rule.	.10	550.00	55.00
10/28/25	DMS	B110	Emails with Aulet regarding Plan and trust issues.	.30	900.00	270.00
10/29/25	DMS	B160	Emails re CNOs for BR, etc.	.30	900.00	270.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/29/25	DWC	B110	Coordinate CNO filing for fee statements	.20	700.00	140.00
10/29/25	LD	B110	File COS re application for protective order [dkt #990].	.30	275.00	82.50
10/30/25	DMS	B110	Call with cred committee professionals.	.30	900.00	270.00
10/31/25	LD	B160	Prepare and file CNO re BR September fee statement.	.50	275.00	137.50
10/31/25	SSL	B160	Receipt/review ECF notice of filing of CNO on BR monthly fee statement.	.10	550.00	55.00
10/31/25	SSL	B110	Receipt/review ECF notice of entry of protective order. Forward same to BR team.	.20	550.00	110.00

TOTAL PROFESSIONAL SERVICES

\$ 55,517.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Daniel M Stolz	Partner	39.30	900.00	35,370.00
Scott S Rever	Partner	1.70	700.00	1,190.00
Donald W. Clarke	Partner	3.00	350.00	1,050.00
Donald W. Clarke	Partner	15.80	700.00	11,060.00
Lorrie Denson	Paralegal	5.70	275.00	1,567.50
Susan S. Long	Counsel	9.60	550.00	5,280.00
TOTALS		75.10		\$ 55,517.50

EXHIBIT B

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DISBURSEMENTS

	Description	Amount
8/01/25	PACER SERVICE - PACER SERVICE, U.S. Courts: PACER 2552798-Q32025	3.00
8/01/25	PACER SERVICE - PACER SERVICE, U.S. Courts: PACER 5252288-Q32025	5.60
8/12/25	PACER SERVICE - PACER SERVICE, U.S. Courts: PACER 5252288-Q32025	3.40
9/04/25	Parking - Trenton Parking for appearance at Hearing - Amex Period Ending 9-30-DWC	7.75
9/30/25	Lexis-Nexis Research - Lexis-Nexis Research, RELX Inc. DBA LexisNexis, 3096020335	9.09
10/06/25	Other Professional, BMC Group, Inc., 429-20251006-1 - Fee for Professional Services - Amex Period Ending 10-31-DMS	213.00
10/16/25	Other Professional, BMC Group, Inc., 429-20251016-1 - Professional Service for Dkt #944 - Amex Period Ending 10-31-DMS	221.37
10/17/25	Other Professional, BMC Group, Inc., 429-20251015-1 - for Professional Services Rendered - Amex Period Ending 10-31-DMS	192.94
10/24/25	Other Professional, BMC Group, Inc., 429-20251024-1 - Fee for Professional Services Rendered - Amex Period Ending 10-31-DMS	201.06
TOTAL DISBURSEMENTS		\$ 857.21