

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

**ATTORNEY SIXTH MONTHLY FEE STATEMENT COVER SHEET
FOR THE PERIOD NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025**

In re: Powin, LLC, *et al.*¹

Applicant: Dentons US LLP (“Dentons”)

Case No. 25-16137 (MBK)
(Jointly Administered)
Chapter 11

Client: Debtors and Debtors in Possession

Case Filed: June 9, 2025

**COMPLETION OF SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION
UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746**

/s/ Lauren Macksoud
Lauren Macksoud

December 12, 2025
Date

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]; and (xii) Powin Canada B.C. Ltd. [2239]. The Debtors’ mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.



**SECTION I
FEE SUMMARY**

Summary of Amounts Requested for the Period

November 1, 2025 through November 30, 2025 (the “**Compensation Period**”):

Fee Total:	\$881,863.50
20% Holdback:	\$176,372.70
Net Fees Sought (less Holdback):	\$705,490.80
Disbursement Total:	\$7,681.07
Total Fees Sought: (Net of Holdback), Plus Disbursements:	\$713,171.87

Summary of Amounts Requested for Previous Periods:

Total Previous Fees and Expenses Requested:	\$5,038,641.50 (\$2,865,248.13+1,167,808.57+550,639.52 +454,945.28)
Total Fees and Expenses Allowed to Date:	\$4,033,056.70
Total Retainer Remaining:	\$0.00
Prior Holdback:	\$997,991.65 (\$569,239.50+\$229,398.85+\$108,572.50+\$90,780.80)
Net Unpaid Fees and Expenses:	\$2,742,632.87 (\$224,246.60+\$344,992.90+\$1,167,808.57+\$550,639.52+\$454,945.28)

Name of Professional and Title	Year Admitted	Hours	Rate	Fee
Sandra R. McCandless – Partner	1973	9.50	\$1,295.00	\$12,302.50
Van C. Durrer II – Partner	1993	72.90 17.40	\$1,800.00 \$900.00	\$131,220.00 \$15,660.00
R. Matthew Garms – Partner	1999	7.90	\$830.00	\$6,557.00
Tania M. Moyron – Partner	2005	87.50 20.60	\$1,545.00 \$772.50	\$135,187.50 \$15,913.50
John D. Beck – Partner	2010	80.80 5.50	\$1,450.00 \$725.00	\$117,160.00 \$3,987.50
Geoffrey M. Miller – Partner	2012	113.10	\$1,250.00	\$141,375.00
Sam J. Alberts - Partner	1992	10.50	\$1,400.00	\$14,700.00
Samuel R. Maizel – Partner	1985	2.50	\$1,400.00	\$3,500.00
Casey W. Doherty, Jr. – Counsel	2011	71.60 16.30	\$1,100.00 \$550.00	\$78,760.00 \$8,965.00
Sarah M. Schrag – Senior Managing Associate	2016	70.50	\$1,100.00	\$77,550.00
David F. Cook – Senior Managing Associate	2017	22.60	\$1,100.00	\$24,860.00
Elysa Chew – Managing Associate	2021	21.50	\$950.00	\$20,425.00
Vanessa Madrigal – Managing Associate	2021	6.50	\$940.00	\$6,110.00
Henry Thomas – Associate	2023	47.60	\$855.00	\$40,698.00
Jemuel Gascon – Associate	2021		\$850.00	
George L. Medina – Senior Paralegal	N/A	43.00 3.40	\$525.00 \$262.50	\$22,575.00 \$892.50
Dianne Thomas-Nichols – Senior Paralegal	N/A	6.60	\$525.00	\$3,465.00
TOTALS	N/A	737.80		\$881,863.50

**SECTION II
SUMMARY OF SERVICES**

Services Rendered	Hours	Fee
B100 – Administration	.50	\$427.50
B110 – Case Administration	4.30	\$4,088.50
B120 - Asset Analysis and Recovery	42.50	\$53,769.50
B130 - Asset Disposition	37.40	\$49,065.00
B140 – Stay Relief/Adequate Protection	0.20	\$309.00
B150 - UCC Issues/Meetings	0.80	\$1,207.50
B160 - Fee/Employment Applications	41.60	\$41,523.00
B185 – Assumption/Rejection of Contracts	0.90	\$1,239.00
B190 – Other Contested Matters	3.10	\$3,055.50
B195 - Non-Working Travel	63.20	\$45,418.50
B230 – DIP Financing/Cash Collateral	0.40	\$210.00
B240 - Tax Issues	0.20	\$309.00
B250 - Real Estate Leases	3.30	\$4,165.00
B310 - Claims Administration and Objections	141.10	\$167,716.00
B320 – Plan and Disclosure Statement (incl. Business Plan)	309.20	\$403,129.00
CUST - Customer Issues	30.10	33,772.00
EMP - Employee Matters	13.90	\$19,209.50
INS – Insurance	0.60	\$805.00
REP - Reporting/Schedules	16.30	\$18,304.00
WARNACT – WARN Act Issues	28.20	\$34,141.00
SERVICES TOTAL:	737.80	\$881,863.50

<p style="text-align: center;">SECTION III SUMMARY OF DISBURSEMENTS</p>

Disbursements	Amount
Travel / Lodgment Fees	\$5,872.57
Virtual Office w/Physical Address for Powin Entity	\$99.00
Research	\$1,709.50
DISBURSEMENT TOTAL	\$7,681.07

<p style="text-align: center;">SECTION IV CASE HISTORY</p>
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- (1) Date cases filed: June 9, 2025 (the “Petition Date”).²
- (2) Chapter under which cases commenced: Chapter 11.
- (3) Date of retention: August 19, 2025, effective as of the Petition Date.

If limit on number of hours or other limitations to retention, set forth: N/A.

- (4) Summarize in brief the benefits to the estates and attach supplements as needed:³

During the six month of these chapter 11 cases, Dentons, as counsel for the above-captioned debtors and debtors-in-possession (the "Debtors"), continued to advance these chapter 11 cases in the following ways:

- (a) Dentons advised and supported the Debtors on matters related to confirming the *Joint Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Powin, LLC and Affiliates and the Official Committee of Unsecured Creditors* (the “Plan”), including working with the Committee on (i) various settlements, documents, and budgets that were part of the Plan supplement filed during this monthly fee period, and (ii) certain administrative and priority claims asserted against the estates;
- (b) Dentons memorialized the Debtors' settlement with a group of WARN claimants, and secured their support for confirmation. This included the underlying Rule 9019 motion;
- (c) Dentons advised the Debtors in finalizing a settlement among the Debtors, the Debtors' largest unsecured creditor and the Committee, also securing such creditors' support for confirmation. This also included an underlying Rule 9019 motion;
- (d) Dentons was successful in obtaining the support of FlexGen Power Systems LLC, the buyer of a large portion of the Debtors' assets, for the Joint Plan of Liquidation, through the settlement of a dispute over certain inventory in Mexico and agreeing on a reserve to address remaining disputes, which remain under negotiation. This included drafting and filing a motion to estimate the claims of FlexGen, which remains outstanding;

² Lead Debtor Case No. 25-16137 (MBK) for Debtor Powin LLC was filed on June 10, 2025, and the remaining Debtors were also filed on June 10, 2025 with the exception of Case No. 25-16136 (MBK), which was filed on June 9, 2025.

³ The following summary is intended to highlight the general categories of services the applicant rendered on behalf of the Debtors and for the benefit of the estates; it is not intended to itemize each and every professional service which the applicant performed.

- (e) Dentons continued to support the Debtors in working with their customer community in addressing warranty and related issues, ultimately on a consensual basis;
- (f) Dentons engaged in significant claim reconciliation activity, successfully negotiating the reclassification of a number of alleged administrative and priority claims. Dentons also worked on research and the drafting of objections to certain claims;
- (g) Dentons addressed the filing requirements of EKS SellCo LLC, including its schedules of assets and liabilities and statement of financial affairs;
- (h) Dentons advised the Debtors and supported the Togut firm in developing a strategy for the successful recovery of \$8 million in excess cash collateral, held by creditors who supply surety bonds for the Debtors' business;
- (i) Dentons worked on various fee application matters, including for the Debtors' investment banker;
- (j) Dentons continued to advise the Debtors in connection with the wind-down and related issues arising in connection with foreign subsidiaries; and
- (k) Rendering all such other services set forth on the invoice attached hereto as **Exhibit A**.⁴

(5) Anticipated distribution to creditors:

- (a) Administrative expenses: Unknown at this time.
- (b) Secured creditors: Unknown at this time.
- (c) Priority creditors: Unknown at this time.
- (d) General unsecured creditors: Unknown at this time.

(6) Final disposition of case and percentage of dividend paid to creditors: Unknown at this time.

(7) This is the sixth monthly fee statement.

⁴ The invoice attached hereto as **Exhibit A** contains detailed descriptions of the services rendered and expenses incurred by the applicant during the Compensation Period.

Dated: December 12, 2025

DENTONS US LLP

/s/ Lauren Macksoud

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- and -

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Counsel for Debtors and Debtors in Possession

EXHIBIT A

DENTONS

Dentons US LLP
601 S. Figueroa Street
Suite 2500
Los Angeles, CA 90017

Powin, LLC
20550 SW 115th Ave
Tualatin, OR 97062

INVOICE #: **5001-1035913**
Invoice Date: December 12, 2025

Matter Number: 15817500-000002
Description: Post Petition

Payment Due Upon Receipt

For professional services rendered through November 30, 2025

Invoice Amount **\$889,544.57**

To pay by E-Check – <https://www.e-billexpress.com/ebpp/DentonsUS>

Electronic Transfer (Preferred Method of Payment):

Citibank, N.A.
227 West Monroe, Chicago, IL 60606
ABA Transit #: [REDACTED] 0801
Account #: [REDACTED] 1693
Account Name: Dentons US LLP
Swift Code: CITIUS33
Reference: Invoice # and/or client matter #

Payment by check (Overnight Delivery):

REMITCO
Dentons #3078
5450 N. Cumberland Avenue
Chicago, IL 60656

OR

Payment by check (USPS):

Dentons US LLP
P.O. Box. 3078
Carol Stream, IL 60132-3078

****Please contact Dentons US LLP directly to validate any request to change our payment details above****

Please send remittance instructions to cashreceipts@dentons.com or include this page with your payment.

Dentons US LLP TIN # [REDACTED] 6730
Questions relating to this invoice should be directed to:
V. Durrer at (213) 243 6050



Client: Powin, LLC

Invoice Date: December 12, 2025

Matter: 15817500-000002

INVOICE #: 5001-1035913

For professional services rendered through November 30, 2025

Fee Detail:

Task Code: B100 - Administration

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/14/25	H. Thomas	B100	Draft email to US Trustee regarding certain debtor bank accounts (.3); call with S. Zimmerman of Uzzi & Lall regarding same (.2).	0.50	427.50
Task Total B100 - Administration				0.50	\$427.50

Task Code: B110 - Case Administration

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/11/25	T. Moyron	B110	Attention to notice of adjournment and upcoming deadlines.	0.30	463.50
11/11/25	G. Medina	B110	Correspond with D. Person, V. Durrer, T. Moyron and C. Doherty regarding the November hearing dates (0.4).; file notice of adjournment and coordinate with Verira regarding service (0.3).	0.70	367.50
11/11/25	C. Doherty, Jr.	B110	Prepare and review and respond to emails regarding notice of adjournment (.2).	0.20	220.00
11/13/25	D. Cook	B110	Analysis re outstanding workstreams.	0.60	660.00
11/13/25	T. Moyron	B110	Analyze emails from M. Kahl, et al. re Charger Holdings.	0.10	154.50
11/14/25	J. Beck	B110	Draft applications to shorten for ACE and WARN settlement approval motions (.6)	0.60	870.00
11/17/25	G. Medina	B110	Correspond with G. Miller and D. Person regarding status conference transcript (0.4); further correspond with G. Miller and send September 3, 2025, hearing transcript requested (0.3).	0.70	367.50
11/18/25	G. Medina	B110	Correspond with C. Doherty and D. Person regarding resolved matters related to the Agenda.	0.40	210.00
11/19/25	G. Medina	B110	Review and send to G. Miller, C. Doherty, S. Schrag and H. Thomas status conference details with chambers regarding confirmation hearing.	0.20	105.00

DENTONS

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Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/22/25	T. Moyron	B110	Analyze and provide comment on agenda (.2); correspond with Togut, V. Durrer, et al. (.2).	0.40	618.00
11/25/25	D. Thomas-Nichols	B110	Correspondence with D. Person with notice of agenda in word (.1).	0.10	52.50
Task Total	B110 - Case Administration			4.30	\$4,088.50

Task Code: B120 - Asset Analysis and Recovery

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/25	C. Doherty, Jr.	B120	Calls regarding surety motion related to plan (.8); prepare motion regarding surety bond (5.3).	6.10	6,710.00
11/01/25	S. Alberts	B120	Analysis re motion to receive express collateral (.3) and review background questions resume (.1) conduct research on surety issue and 502(e) (.2), Communicate with V. Durrer and C. Doherty about motion for release of surety funds and estimation (.6), receive background presentation deck on surety and proof of claims, consider issues (1.1) and follow up communications regarding same in preparation of motion (.3).	2.40	3,360.00
11/02/25	C. Doherty, Jr.	B120	Calls regarding surety motion related to plan (.3); continue to prepare motion regarding surety bond and plan (3.4); research re same (2.9).	6.60	7,260.00
11/02/25	S. Alberts	B120	Receive, review and revise Motion (1.6), CW C. Doherty about revisions, follow up issue, and related motion issues (.4), receive, review and comment on Motion (.9), and follow up communications (.3).	3.20	4,480.00
11/03/25	S. Alberts	B120	Review of materials and briefing related to motion to disallow/estimate surety claims and for turnover.	3.60	5,040.00
11/03/25	D. Thomas-Nichols	B120	Review and revise motion disallowing claims of NY Magic (.9); correspondence with C. Doherty regarding same (.1).	1.00	525.00
11/03/25	V. Durrer	B120	Correspond with L. Tancredi re surety bond collateral (.2); analysis re same (.2); call to Avalon surety re recovery of excess collateral (.1); revise collateral recovery motion (.8); analysis re witness and exhibit list re same (.1).	1.40	2,520.00

DENTONS

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December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/25	C. Doherty, Jr.	B120	Prepare draft of motion regarding surety bonds and plan; call with S. Alberts regarding motion (.5); call with V. Durrer regarding motion (.2); calls with Uzzi and Lall regarding motion (.3).	1.00	1,100.00
11/04/25	T. Moyron	B120	Attention to surety motion and related issues (.6).	0.60	927.00
11/04/25	C. Doherty, Jr.	B120	Prepare draft and supervise filing of motion regarding surety bonds (5.9); call with B. Kane regarding motion (1.0); calls with Dentons and Uzzi regarding motion (.5).	5.90	6,490.00
11/04/25	G. Medina	B120	Edit surety estimation motion review per his request (0.9).	0.90	472.50
11/04/25	V. Durrer	B120	Continue to revise motion to recover excess surety collateral (1.7); call with Avalon re same (.1); call with L. Tancredi re bond motion (.1); analysis re same (.3)	2.20	3,960.00
11/05/25	V. Durrer	B120	Follow up re comments to surety collateral recovery motion.	0.10	180.00
11/06/25	V. Durrer	B120	Correspond with Togut re BHER complaint (.1); call with Togut re same (.3); call with L. Tancredi re surety motion (.1).	0.50	900.00
11/07/25	C. Doherty, Jr.	B120	Call with J. Beck regarding status of surety motion.	0.10	110.00
11/11/25	V. Durrer	B120	Call with L. Tancredi re surety settlement	0.20	360.00
11/11/25	C. Doherty, Jr.	B120	Review and respond to emails regarding service of surety motion (.1).	0.10	110.00
11/12/25	V. Madrigal	B120	Conduct analysis of certain inventory held in Oxford, MA to advise on ability to sell to third party.	1.00	940.00
11/13/25	V. Durrer	B120	Call with UCC advisors re data preservation issues.	0.30	540.00
11/14/25	G. Medina	B120	Analysis related to Chapter 11 debtors Pine Gate related to Powin's mobile storage unit at a Pine Gate project.	0.40	210.00
11/17/25	V. Durrer	B120	Follow up re surety motion (.1); call with L. Tancredi re settlement re same (.2).	0.30	540.00
11/19/25	V. Durrer	B120	Call with L. Tancredi (.1); correspond with Avalon team re surety relief (.1) call with L. Tancredi (.1); correspond with Avalon team re surety relief (.1).	0.40	720.00

DENTONS

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December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/20/25	S. Alberts	B120	Communicate internally about status of Motion to estimate and for turnover (.2) review of filed motion and tangential pleading by other surety (.4) and follow up communications (.3).	0.90	1,260.00
11/20/25	V. Durrer	B120	Revise term sheet proposed by Tancredi re surety settlement (4); correspond with Avalon team re surety motion (.1); analysis re Avalon proposal (.3).	0.80	1,440.00
11/23/25	V. Durrer	B120	Call with Avalon counsel re surety bond motion and revised order.	0.50	900.00
11/24/25	S. Alberts	B120	Analysis about resolution of surety issue and plan confirmation.	0.20	280.00
11/24/25	G. Miller	B120	Prepare Applied Surety settlement.	0.60	750.00
11/24/25	V. Durrer	B120	Review proposed order for Avalon matter (.1); revise stipulation with L. Tancredi re same (.5).	0.60	1,080.00
11/25/25	G. Miller	B120	Finalize and file notice of filing Applied Surety settlement.	0.40	500.00
11/25/25	D. Thomas-Nichols	B120	Finalize and file notice of filing settlement agreement with Applied Surety Underwriters, Siriuspoint America Insurance Company and Pennsylvania Insurance Company (.1); correspondence with team with filed notice (.1).	0.20	105.00
Task Total B120 - Asset Analysis and Recovery				42.50	\$53,769.50

Task Code: B130 - Asset Disposition

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/25	G. Miller	B130	Finalize and file amended abandonment order.	0.20	250.00
11/04/25	T. Moyron	B130	Analyze email from D. Yang regarding Weifang Genius Electronics Co., Ltd. (.1) and emails regarding various inquiries including inventory (.1).	0.20	309.00
11/04/25	V. Durrer	B130	Analysis re FlexGen dispute over sale APA (.1); call with B. Kane re same (.1); analysis re inventory issues re FlexGen dispute (.3); correspond with B. Denton re same (.1)	0.60	1,080.00

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<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/05/25	H. Thomas	B130	Review language in stipulation and agreed order regarding application of JP Morgan Chase funds and correspondence with M. Kahl and J. Beck regarding same.	0.20	171.00
11/06/25	H. Thomas	B130	Review joint stipulation and order on applying Chase account to Chase obligations.	0.20	171.00
11/06/25	G. Miller	B130	Finalize Lu Family bill of sale and emails with G. Dunne re same (.3); emails with V. Durrer re amended abandonment order and finalize and file same (.4).	0.70	875.00
11/06/25	G. Medina	B130	Review request from G. Miller prepare, assemble and send bill of sale assignment and assumption agreement among QPO Energy, Inc. and BESS RemainCo LLC (0.3).	0.30	157.50
11/06/25	V. Durrer	B130	Call with S. Zimmerman re inventory issues impacting FlexGen dispute (.2); analysis re same (.2); call with FlexGen counsel re dispute (.2); analysis re abandonment order (.1).	0.70	1,260.00
11/10/25	J. Beck	B130	Call with Uzzi team and UK and Netherlands lawyers at Dentons regarding winding down foreign subsidiaries	0.30	435.00
11/10/25	G. Miller	B130	Emails with G. Dunne and M. Garms re sale of Warwick inventory.	0.20	250.00
11/10/25	V. Durrer	B130	Call with Huron re FlexGen dispute (.1); prepare response letter to FlexGen (.5); call with Mispagel re same (.1); call with G. Uzzi re same (.1)	0.80	1,440.00
11/11/25	J. Beck	B130	Review FlexGen APA to determine whether it acquired certain inventory assets thereunder (.6); draft memo re same (.7).	1.30	1,885.00
11/11/25	T. Moyron	B130	Attention to emails from FlexGen & UL re FlexGen proposal (.3); correspond with M. Garms, et al., regarding documentation and timing (.2); analyze emails regarding Mainfreight and RH re status and next steps (.2).	0.70	1,081.50
11/11/25	G. Miller	B130	Prepare Bill of Sale re Warwick inventory and emails with M. Garms re same.	0.30	375.00

DENTONS

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<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/11/25	V. Durrer	B130	Analysis re FlexGen Welldex proposal (.2); analysis re RH issues (.2); call with K. Capuzzi re same (.1); follow up with G. Uzzi re FlexGen negotiations (.1) call with G. Uzzi re RH issues (.1).	0.70	1,260.00
11/13/25	G. Miller	B130	Prepare RH Shipping Bill of Sale.	0.60	750.00
11/13/25	T. Moyron	B130	Analyze FlexGen proposal (.2) and related emails (.3).	0.50	772.50
11/13/25	V. Durrer	B130	Call with G. Uzzi re FlexGen negotiations (.1); call with J. Mispagel re same (.2).	0.30	540.00
11/14/25	V. Madrigal	B130	Revise settlement agreement with buyer (1.8); revise corresponding bills of sale (1.0); analysis re the same (1.0).	3.80	3,572.00
11/14/25	G. Miller	B130	Finalize bill of sale re Warwick inventory and email G. Dunne re same.	0.20	250.00
11/14/25	R. Garms	B130	Review and comment on settlement agreement.	1.40	1,162.00
11/14/25	V. Durrer	B130	Follow up re FlexGen claims and litigation (.2); analysis re possible RH transaction with FlexGen (.1).	0.30	540.00
11/17/25	T. Moyron	B130	Call with J. Uzzi and V. Durrer regarding FlexGen.	0.20	309.00
11/17/25	R. Garms	B130	Review filing from Flexgen.	0.40	332.00
11/17/25	V. Durrer	B130	Follow up re FlexGen dispute (.2); analysis re inventory based settlement re same (.1); review FlexGen administrative claim (.1); call with UCC Advisors re FlexGen dispute (.2); correspond with Latham re same (.2); correspond with K. Aulet re same (.1).	0.90	1,620.00
11/18/25	R. Garms	B130	Review quitclaim deeds and respond to questions regarding same (0.3); review correspondence from Flexgen (0.5).	0.80	664.00
11/18/25	T. Moyron	B130	Correspondence with U&L, et al., re RH (.1); correspond regarding changes to settlement with UCC advisors, M. Garms, et al., re Welldex (.2).	0.30	463.50
11/19/25	S. Alberts	B130	Receive and forward message concerning sureties request for more time.	0.20	280.00
11/19/25	R. Garms	B130	Call regarding settlement agreement and discovery.	1.00	830.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/19/25	G. Miller	B130	Call with Uzzi and Dentons teams re FlexGen issues.	1.00	1,250.00
11/19/25	V. Durrer	B130	Analysis re Welldex proposal (.2); call with Latham re same (.6); analysis re same (.1); call with UCC advisors re FlexGen settlement proposal (.3).	1.20	2,160.00
11/20/25	T. Moyron	B130	Attention to Welldex settlement.	0.20	309.00
11/20/25	V. Madrigal	B130	Review revisions to and incorporate revisions to settlement agreement and address open items needed to finalize.	0.90	846.00
11/20/25	R. Garms	B130	Call regarding plan matters.	1.20	996.00
11/20/25	V. Durrer	B130	Revise proposed Welldex settlement (.3); further negotiations re same (.2); correspond with B. Denton re same (.2); respond to FlexGen discovery (.5); correspond with J. Mispagel re possible settlement (.3); analysis re same (.1); call with K. Capuzzi re same (.1).	1.70	3,060.00
11/21/25	R. Garms	B130	Review and comment on motion to disallow Flexgen's administrative claim (0.7); call regarding same (0.2).	0.90	747.00
11/21/25	G. Miller	B130	Review memorandum re Leeward and esVolta inventory (.4); call with R. Bajaj re same (.2).	0.60	750.00
11/23/25	V. Durrer	B130	Revise RH stipulation.	0.50	900.00
11/24/25	R. Garms	B130	Review revisions to settlement agreement (0.8); e-mails regarding quitclaim deeds (0.6).	1.40	1,162.00
11/24/25	T. Moyron	B130	Correspondence from FlexGen's counsel, et al., re settlement (.4); analyzed changes to proposed settlement and attention to open issues (.8); revise settlement language with FlexGen (.8); analysis re same (.5); prepare email to FlexGen's counsel re settlement (.2); analyze further email from FlexGen counsel attaching comments to proposal (.1); confer with V. Durrer, et al., regarding same and final agreement (.2); analyze related emails (.2); call with V. Durrer and G. Uzzi regarding same (.2); call with B. Denton, V. Durrer et al., re next steps regarding documentation (.1).	3.50	5,407.50

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/24/25	T. Moyron	B130	Attention to Welldex settlement (.2); meeting with V. Durrer (.2) and call with G. Miller regarding same (1); attention to further emails from counsel to Latham re Welldex (.3); analyze settlement (.1); analyze notice and provide comment thereon (.3).	1.20	1,854.00
11/24/25	V. Madrigal	B130	Finalize QuitClaim deed and coordinate their execution.	0.80	752.00
11/24/25	V. Durrer	B130	Call with J. Schwartz re Solar Carver issues (.1); correspond with J. Mispagel re hearing (.1); call with B. Kane re same (.1); revise Welldex settlement (1.2); call with J. Mispagel (.2); revise language re confirmation order requested by FlexGen re disputed administrative claim (.8); follow up call with J. Mispagel (.2).	2.70	4,860.00
11/25/25	R. Garms	B130	E-mails regarding quitclaim deeds (0.6); respond to questions regarding same (0.2).	0.80	664.00
11/25/25	G. Medina	B130	Send per the request of G. Miller RH Stipulation.	0.20	105.00
11/25/25	D. Thomas-Nichols	B130	Finalize and file notice of filing settlement agreement with Flexgen Power Systems, LLC resolving The Welldex Dispute (.2); correspondence with team with filed notice (.1).	0.30	157.50
Task Total B130 - Asset Disposition				37.40	\$49,065.00

Task Code: B140 - Stay Relief/Adeq Prot

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/24/25	T. Moyron	B140	Analyze Pulse motion (.1); and related correspondence with F. Oswald, et al. (.1).	0.20	309.00
Task Total B140 - Stay Relief/Adeq Prot				0.20	\$309.00

Task Code: B150 - UCC Issues/Meetings

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/05/25	T. Moyron	B150	Correspond with K. Aulet re ACE.	0.10	154.50
11/05/25	J. Beck	B150	Call with T. Moyron and Brown Rudnick regarding plan supplement (.3)	0.30	435.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/06/25	T. Moyron	B150	Correspond with Committee advisors re documents and call regarding plan supplement (.2).	0.20	309.00
11/13/25	T. Moyron	B150	Correspond with V. Durrer regarding data preservation and documents to Committee.	0.20	309.00
Task Total B150 - UCC Issues/Meetings				0.80	\$1,207.50

Task Code: B160 - Fee/Employment Applications

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/11/25	D. Thomas-Nichols	B160	Review docket and confirm no objections filed re third monthly fee statement (.1); prepare certificate of no objection (.2); correspondence with team regarding same (.1).	0.40	210.00
11/11/25	T. Moyron	B160	Attention to first interim fee application and correspond regarding same with D. Pearson, et al.	0.20	309.00
11/11/25	V. Durrer	B160	Analysis re timing of interim fee application (.1); commence draft of interim fee application (.2).	0.30	540.00
11/12/25	D. Thomas-Nichols	B160	Correspondence with G. Medina re filing certificate of no objection.	0.10	52.50
11/12/25	G. Medina	B160	Correspond with G. Dattoli and review and send certificate of no objection related to DUS third fee statement to T. Moyron and V. Durrer (0.4); coordinate with docketing regarding omnibus hearing and first Interim fee application hearing (0.2); follow-up with V. Durrer and T. Moyron and filed CNO and coordinate with Verita regarding service (0.3).	0.90	472.50
11/12/25	V. Durrer	B160	Analysis re comments to interim fee application (.2); revise monthly fee statement (.8).	1.00	1,800.00
11/14/25	S. Schrag	B160	Further prepare Huron Fee Application.	0.30	330.00
11/14/25	V. Durrer	B160	Follow up re fee statements.	0.10	180.00
11/17/25	H. Thomas	B160	Draft Dentons first interim fee application.	0.60	513.00
11/18/25	D. Thomas-Nichols	B160	Correspondence regarding timing of monthly fee statement.	0.10	52.50
11/18/25	T. Moyron	B160	Attention to invoices and fee applications.	0.30	463.50

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/19/25	H. Thomas	B160	Draft first interim fee application of Dentons.	5.30	4,531.50
11/19/25	G. Medina	B160	Correspond with H. Thomas regarding September fees and first interim fee application.	0.20	105.00
11/20/25	H. Thomas	B160	Draft first interim fee application of Dentons.	4.70	4,018.50
11/20/25	D. Thomas-Nichols	B160	Prepare draft of fourth monthly fee statement.	1.50	787.50
11/21/25	D. Thomas-Nichols	B160	Correspondence with D. Person with draft interim fee application.	0.10	52.50
11/24/25	T. Moyron	B160	Analyze and provide comment on fee application (.8); correspond with M. Turnipseed, et al., re Huron application (.1); further attention to fee application (.3).	1.20	1,854.00
11/24/25	H. Thomas	B160	Draft interim fee application to include detailed descriptions of work produced by Dentons professionals and list firm contributions to the chapter 11 cases after careful review of Dentons' invoices.	5.10	4,360.50
11/25/25	J. Beck	B160	Draft inserts regarding descriptions of certain tasks to be inserted in fee application	0.70	1,015.00
11/25/25	S. Maizel	B160	Multiple telephone conferences with T. Moyron re preparation of fee application (.5); review and revise fee application (2.0).	2.50	3,500.00
11/25/25	S. Schrag	B160	Confer with T. Moyron re fee application (.1); confer with H. Thomas re fee application (.2); review and comment on material in support of fee application (5.6); confer with V. Durrer and T. Moyron re the same (.2).	6.10	6,710.00
11/25/25	D. Thomas-Nichols	B160	Review and revise fourth monthly fee application (1.0); prepare redline and circulate (.2); correspondence with T. Moyron re final edits to application (.2); finalize exhibit (.2); file with court fourth monthly fee application (.1); correspondence with team with filed fourth monthly fee application (.1).	1.80	945.00
11/25/25	C. Doherty, Jr.	B160	Prepare insert for customer issues for fee application.	0.30	330.00
11/25/25	V. Durrer	B160	Prepare interim fee application (.8); revise September monthly fee statement (.4).	1.20	2,160.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/26/25	S. Schrag	B160	Review material re fee application (1.1); confer with H. Thomas re fee application (.2);confer with T. Moyron and V. Durrer re the same (.1); confer with M. Turnipseed re final fee application (.3).	1.70	1,870.00
11/26/25	H. Thomas	B160	Revise, proofread, and conduct close review of interim fee application and associated fee calculations (2.1), finalize exhibits thereto and correspondence with billing team regarding creation of one such exhibit (.5), and correspondence regarding revisions with T. Moyron and G. Medina regarding finalizing filing (.5).	3.10	2,650.50
11/26/25	D. Thomas-Nichols	B160	Finalize and file notice of hearing of retained professionals re first interim applications (.2); correspondence with team with filed notice (.1).	0.30	157.50
11/26/25	V. Durrer	B160	Finalize budget for interim fee application.	0.60	1,080.00
11/26/25	G. Medina	B160	Received and assemble DUS first interim Fee application and send to T. Moyron, V. Durrer, J. Beck, H. Thomas and D. Nichols for review (0.5); filed DUS first interim fee application (0.4).	0.90	472.50
Task Total B160 - Fee/Employment Applications				41.60	\$41,523.00

Task Code: B185 - Assumption/Rejection of Contracts

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/04/25	G. Miller	B185	Review prior correspondence re assumption of PTC contract.	0.20	250.00
11/10/25	V. Durrer	B185	Analysis re Stepfunction contract.	0.10	180.00
11/11/25	T. Moyron	B185	Analyze email from counsel to Oracle (.1) and correspond re same (.1).	0.20	309.00
11/21/25	G. Miller	B185	Review correspondence re Oracle objection to assumption and assignment of contract (.2); Call with S. Christianson re same (.2).	0.40	500.00
Task Total B185 - Assumption/Rejection of Contracts				0.90	\$1,239.00

Task Code: B190 - Other contested matters

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
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DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/06/25	T. Moyron	B190	Analyze prior emails regarding document requests and documents sent by C. Paulson (.4) and call with V. Durrer regarding same (.2).	0.60	927.00
11/17/25	G. Medina	B190	Correspond with J. Beck regarding settlement motion (0.2); compile and send ACE settlement motion for review (0.4); review edit and send Stipulation and Agreed Order Regarding Mainfreight Distribution Pty Ltd Claim No. 383 to G. Miller for review (0.3); file MF stipulation (0.2); file 9019 Ace Settlement motion and application to shorten time (0.4); correspond with Verita regarding recent filings for service (0.2).	1.70	892.50
11/18/25	T. Moyron	B190	Attention to expeditors' motion.	0.20	309.00
11/20/25	T. Moyron	B190	Attention to issues regarding Avalon and NY Marine, including exhibit list and filing.	0.30	463.50
11/22/25	T. Moyron	B190	Call with J. Beck an G. Uzzi re Stratford.	0.30	463.50
Task Total B190 - Other contested matters				3.10	\$3,055.50

Task Code: B195 - Non-Working Travel

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/23/25	T. Moyron	B195	Travel from Los Angeles to New York for confirmation hearing and other hearings.	7.80	6,025.50
11/23/25	C. Doherty, Jr.	B195	Travel from Houston to NYC for hearing.	5.50	3,025.00
11/23/25	V. Durrer	B195	Travel to east coast for confirmation hearing.	6.00	5,400.00
11/24/25	C. Doherty, Jr.	B195	Travel from NYC to Princeton, NJ for hearing.	2.40	1,320.00
11/25/25	J. Beck	B195	Non-working travel to/from Scarsdale NY and Trenton, NJ for the Powin confirmation hearing	5.50	3,987.50
11/25/25	T. Moyron	B195	Travel from NY to NJ for hearings on plan confirmation, ACE settlement, WARN settlement, and other agenda matters (2.1); travel back from NJ to NY after hearings on hearings on plan confirmation, ACE settlement, WARN settlement, and other agenda matters (2.2).	4.30	3,321.75

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/25/25	C. Doherty, Jr.	B195	Travel to Trenton Courthouse and back to Houston, Texas (via flight from Philadelphia, PA).	8.40	4,620.00
11/25/25	V. Durrer	B195	Travel to hearing (1.4); return travel from hearing (1.0).	2.40	2,160.00
11/25/25	G. Medina	B195	Travel to and attend confirmation hearing.	3.40	892.50
11/26/25	T. Moyron	B195	Travel from NY to LA after confirmation and settlement hearings.	8.50	6,566.25
11/26/25	V. Durrer	B195	Return to Los Angeles from confirmation hearing.	9.00	8,100.00
Task Total	B195 - Non-Working Travel			63.20	\$45,418.50

Task Code: B230 - DIP financing/Cash Collateral

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/25	G. Medina	B230	Correspond with J. Beck and follow-up with vendor regarding lien searches (0.2); follow-up with vendor regarding Federal Court results (0.2).	0.40	210.00
Task Total	B230 - DIP financing/Cash Collateral			0.40	\$210.00

Task Code: B240 - Tax Issues

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/11/25	T. Moyron	B240	Analyze correspondence from D. Intrieri, et al., regarding tax sales credits/refund analysis.	0.20	309.00
Task Total	B240 - Tax Issues			0.20	\$309.00

Task Code: B250 - Real Estate Leases

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/05/25	G. Miller	B250	Prepare motion to reject Lu Properties lease.	0.80	1,000.00
11/06/25	G. Miller	B250	Prepare motion to reject Lu Properties lease.	0.50	625.00
11/07/25	G. Miller	B250	Revise order on Lu Properties lease rejection motion.	1.50	1,875.00
11/12/25	G. Miller	B250	Call with G. Dunne re rejection of Lu Properties lease.	0.30	375.00
11/17/25	S. Schrag	B250	Review correspondence from counterparty re lease in Canada.	0.10	110.00
11/17/25	V. Durrer	B250	Call with F. Oswald re lease dispute.	0.10	180.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
Task Total	B250 - Real Estate Leases			3.30	\$4,165.00

Task Code: B310 - Claims Administration and Objections

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/25	S. Schrag	B310	Prepare 9019 Motion re ACE administrative claim (.9); confer with Verita re the same (.1); review correspondence re the same (.1).	1.10	1,210.00
11/01/25	G. Miller	B310	Raise motion to reclassify Expeditors' claim.	1.20	1,500.00
11/02/25	S. Schrag	B310	Continue to prepare 9019 Motion re ACE administrative claim, including preparing additional details regarding settlement terms.	1.40	1,540.00
11/02/25	G. Miller	B310	Prepare motion to reclassify Expeditors' administrative claim.	1.30	1,625.00
11/03/25	H. Thomas	B310	Draft objection to Galp claim (2.2); communication with creditors regarding administrative claims (.2).	2.40	2,052.00
11/03/25	S. Schrag	B310	Continue preparing settlement motion re ACE Engineering 503(b)(9) claim (1.7); analysis re the same (.2); review agreement terms (.3); incorporate the same into draft (1.0).	3.10	3,410.00
11/03/25	G. Miller	B310	Review Ace MSA (.2); review emails re ACE settlement terms (.6); review draft ACE settlement terms and related Plan provisions (.3); call with R. Bajaj re Expeditors and Galp claims (.2); analysis re outstanding administrative claims (.1); follow up with B. Theisen re documentation re Galp inventory (.1); prepare stipulation resolving Mainfreight administrative claim (.7); research and analysis re motion to reclassify Expeditors claim (1.3); further prepare motion to reclassify Expeditors claim (2.3).	5.80	7,250.00



Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/04/25	H. Thomas	B310	Prepare for and attend call with Control Source regarding administrative expense claim (.4); correspondence with J. Beck, Verita, and Control Source regarding creditor questions and processes for amending claim (.7); correspondence with Genius regarding goods (.1); correspondence with Allianz (agent for CES) and review of provided documentation (.3).	1.50	1,282.50
11/04/25	J. Beck	B310	Call H. Thomas regarding Control Source 503(b)(9) claims (.1); review control source claim and underlying support for same (.4); call with Control Source regarding 503(b)(9) claim (.2)	0.70	1,015.00
11/04/25	S. Schrag	B310	Continue preparing settlement motion re ACE Engineering 503(b)(9) claim (.7); prepare declaration in support (1.1); prepare order in support (.9); review additional agreement terms (.5).	3.20	3,520.00
11/04/25	T. Moyron	B310	Analyze email from G. Young regarding Clean Energy Services invoices (.1) and correspond with H. Thomas regarding same (.1).	0.20	309.00
11/04/25	G. Miller	B310	Emails with K. Capuzzi re calculation of Mainfreight amended claim (.3); prepare motion to reclassify Expeditors administrative claim (.5); Follow up with K. Kresge re postpetition amounts outstanding (.2); call with D. Intrieri re outstanding amounts owed to AWS (.1).	1.10	1,375.00
11/05/25	T. Moyron	B310	Teams meeting with U&L, H. Thomas, et al., regarding status of claims reconciliation process.	0.90	1,390.50
11/05/25	H. Thomas	B310	Attend call regarding open items on claims administration with Dentons and Uzzi & Lall teams (.9); call with Dentons team regarding administrative claims, and objections to claims (.8).	1.70	1,453.50
11/05/25	J. Beck	B310	Call with Dentons and Uzzi teams to review and coordinate status of claims negotiations, objections, and next steps (.9)	0.90	1,305.00
11/05/25	S. Schrag	B310	Confer with G. Miller re Expeditors' claim (.1); conduct research regarding treatment of the same (.1).	0.20	220.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/05/25	C. Doherty, Jr.	B310	Teams meeting with U&L, H. Thomas, et al., regarding status of claims negotiations, objections, and next steps (.9); meeting with V. Durrer, J. Beck, et al., regarding resolution of administrative claims (.7).	1.60	1,760.00
11/05/25	G. Miller	B310	Call with Dentons and Uzzi re reconciliation of claims re plan and analysis re same (.9); review revisions to stipulation resolving Mainfreight claims and email T. Moyron and V. Durrer re same (.3); further prepare motion to reclassify Expeditors claim (1.9); Emails with S. Schrag re same (.2); review and analysis re outstanding administrative claims and open issues (.4).	3.70	4,625.00
11/06/25	S. Schrag	B310	Conduct research re GUC claims and standard for storage fees and associated costs that don't benefit the estate (2.7); confer with G. Miller re findings (.6).	3.30	3,630.00
11/06/25	H. Thomas	B310	Correspondence with multiple claimants regarding amending their claims.	0.90	769.50
11/06/25	T. Moyron	B310	Attention to administrative claims and correspondence regarding resolution (.3).	0.30	463.50
11/06/25	G. Miller	B310	Revise motion to reclassify Galp claim (.1); further prepare motion to reclassify Expeditors claim (1.4); research and analysis re motion to reclassify Expeditors claim (1.5); Emails with S. Schrag re same (.3).	3.30	4,125.00
11/06/25	G. Medina	B310	Correspond with Verita regarding request for Ameresco claim.	0.20	105.00
11/07/25	J. Beck	B310	Review Ameresco claims and request to dispose of inventory and draft summary regarding same (1.0); call with Everstream regarding their administrative expense claim (.5).	1.50	2,175.00
11/07/25	H. Thomas	B310	Correspondence with claimants regarding amending administrative claims and issues related thereto (.4); call with Resilience360 to discuss claim priority status (.5) correspondence within Dentons regarding status of amendments to administrative claims same. (.6).	1.50	1,282.50

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/07/25	S. Schrag	B310	Prepare settlement agreement and settlement motion re ACE claims.	2.20	2,420.00
11/07/25	G. Miller	B310	Prepare motion to reclassify Galp claim.	0.30	375.00
11/09/25	S. Schrag	B310	Further prepare ACE settlement agreement and 9019 motion to incorporate additional negotiations.	1.90	2,090.00
11/09/25	G. Miller	B310	Analysis and research re motion to reclassify Expeditors claim (1.2); further prepare motion to reclassify Expeditors administrative claim and email T. Moyron re same (.3).	1.50	1,875.00
11/10/25	H. Thomas	B310	Confer with Dentons and Uzzi teams regarding open items and claims administrations (.5); confer with Verita and claimants regarding claims amendments (.3); correspondence with T. Moyron regarding administrative claimants and status of potential objections (.4) .	1.20	1,026.00
11/10/25	T. Moyron	B310	Meeting with U&L, et al., regarding claims (.3).	0.30	463.50
11/10/25	G. Miller	B310	Call with B. Theisen re Galp inventory (.2); prepare stipulation resolving Mainfreight claim (1.1) analysis re outstanding claims and plan issues and discussion with Uzzi and Dentons teams re same (.5); call with D. Intrieri re Mainfreight claim (.2); research and analysis re motion to reclassify Expeditors' administrative claim (3); Further prepare motion re same (3); Internal communications and analysis re same (.3).	8.30	10,375.00
11/11/25	J. Beck	B310	Attention to request for late filed claim (1.6)	1.60	2,320.00
11/11/25	T. Moyron	B310	Analyze updated Expeditors motion to reclassify.	0.30	463.50
11/11/25	S. Schrag	B310	Prepare objection to CATL secured claim (1.9); prepare declaration in support (.7); prepare order (.5); review underlying materials in support (.4); conduct research regarding alleged security interest (.9); confer with J. Beck re the same (.1); call with T. Moyron re the secured interest (.1); correspondence with T. Moyron re the same (.2).	4.80	5,280.00



Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/11/25	G. Miller	B310	Prepare stipulation resolving RH Shipping claim (.9); Call with V. Durrer and K. Capuzzi re same (.1) (1.0); further prepare motion to reclassify Expeditors; claim (1.1).	2.10	2,625.00
11/11/25	V. Durrer	B310	Analysis re Ameresco claim (.1); analysis re request for late claim allowance (.1).	0.20	360.00
11/12/25	J. Beck	B310	Call with Ameresco lawyer regarding inventory (.3).	0.30	435.00
11/12/25	S. Schrag	B310	Review correspondence re Expeditors objection.	0.20	220.00
11/12/25	G. Miller	B310	Prepare stipulation and agreed order resolving RH Shipping claims.	2.00	2,500.00
11/13/25	S. Schrag	B310	Prepare correspondence to C. Paulson re CATL claim and objection.	0.30	330.00
11/13/25	G. Miller	B310	Emails with the Committee and Uzzi teams re motion to reclassify Expeditors claim (.2); emails and call with M. Sawyer re Mainfreight stipulation (.4); Emails with V. Durrer re same (.2); call with R. Bajaj re Galp issues (.2); email Dentons team re same (.3) review updated Mainfreight stipulation (.1); prepare stipulation and agreed order resolving RH Shipping claims (1.0); further prepare motion to reclassify Galp claim (1); Review and analysis re communications and documentation in support of Galp claim (.7); review and analysis re outstanding administrative claims (.8).	4.90	6,125.00
11/13/25	T. Moyron	B310	Attention to CATL POC and objection (.6) and emails with U&L, et al (.2).	0.80	1,236.00
11/13/25	T. Moyron	B310	Analyze email from UST re accounts (.1); correspond with U&L regarding same (.2).	0.30	463.50
11/13/25	V. Durrer	B310	Analysis re request by Verita re claims issue (.1); analysis re VOya Issues (.1); analysis re GALP claim (.1).	0.30	540.00
11/13/25	S. Schrag	B310	Analysis regarding CATL objection (.5); continue preparing objection to CATL claim (.8).	1.30	1,430.00
11/14/25	S. Schrag	B310	Review material regarding CATL objection.	0.20	220.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/14/25	G. Miller	B310	Further prepare RH Shipping stipulation and agreed order and email G. Uzzi re same (.4); further prepare motion to reclassify Galp claim (.5); call with T. Moyron re Expeditors claim (.2); further prepare motion to reclassify Expeditors claim (2.5).	3.60	4,500.00
11/14/25	V. Durrer	B310	Follow up re settlement of Voya claims.	0.20	360.00
11/16/25	S. Schrag	B310	Conduct research regarding setoff (1.0); review contracts and related documents re CATL (.4); review analysis of C. Paulson and P. Jiang regarding deposits (.2); call with T. Moyron re the basis of the security interest (.3); call with C. Paulson and T. Moyron re the same (.2).	2.10	2,310.00
11/16/25	G. Miller	B310	Prepare stipulation and agreed order resolving RH Shipping claims.	0.60	750.00
11/17/25	T. Moyron	B310	Meeting with U&L, V. Durrer, et al., re open claim items.	1.00	1,545.00
11/17/25	T. Moyron	B310	Attention to Expeditors' issues and motion (.2) and calls with V. Durrer (.1) and G. Miller re same (.1).	0.40	618.00
11/17/25	S. Schrag	B310	Call with G. Uzzi, T. Moyron, C. Paulson, P. Jiang, and V. Durrer re resolution of issues in China and CATL claim (1.0); confer with T. Moyron re Expeditors claim and objection (.2); review revised objection (.2).	1.40	1,540.00
11/17/25	G. Miller	B310	Further prepare and finalize stipulation and agreed order resolving Mainfreight claims.	1.60	2,000.00
11/17/25	G. Miller	B310	Further prepare motion to reclassify Expeditors claim (1.2); Review stay relief hearing transcript re same (.4).	1.60	2,000.00
11/17/25	G. Miller	B310	Further prepare stipulation resolving RH Shipping claims and emails with V. Durrer re same.	2.10	2,625.00
11/17/25	G. Miller	B310	Further prepare motion to reclassify Galp claim.	1.20	1,500.00
11/17/25	G. Miller	B310	Analysis re outstanding claims and going forward strategy and call with Dentons and Uzzi re same.	1.00	1,250.00
11/17/25	V. Durrer	B310	Finalize Voya settlement.	0.10	180.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/18/25	S. Schrag	B310	Prepare objection to CATL claim (2.2); prepare declaration in support (1.7); prepare order (.9); analyze underlying agreements (.7); analyze underlying Arbitration statement of claim (.3); conduct research in support of the same (2.4).	8.20	9,020.00
11/18/25	G. Miller	B310	Analysis re Galp claim and evidence in support thereof (.3); call with B. Theisen re Galp claim (.2); emails with G. Uzzi and V. Durrer re potential settlement (.6).	1.10	1,375.00
11/18/25	G. Miller	B310	Further prepare motion to reclassify Galp claim.	0.50	625.00
11/19/25	J. Beck	B310	Review background materials related to CATL dispute and claim (1.5); revise draft objection to recharacterize and disallow CATL claim (2.8); call with S. Schrag regarding certain factual and legal issues related to CATL objection (.2)	4.50	6,525.00
11/19/25	H. Thomas	B310	Draft update emails to Dentons and Uzzi teams regarding administrative expense claims objection status and next steps (.5); calls with G. Miller and S. Zimmerman related thereto (.4).	0.90	769.50
11/19/25	S. Schrag	B310	Confer with T. Moyron re GUC claims.	0.20	220.00
11/19/25	S. Schrag	B310	Confer with J. Beck re objection to CATL claim (.2); conduct research in support of the same regarding UCC (1.6); confer with T. Moyron, J. Beck, and V. Durrer re the same (.1).	1.90	2,090.00
11/19/25	V. Durrer	B310	Finalize Voya settlement.	0.20	360.00
11/19/25	V. Durrer	B310	Review Voya settlement counter proposal.	0.20	360.00
11/20/25	T. Moyron	B310	Call with J. Beck regarding WARN, CATL, and related matters.	0.40	618.00
11/20/25	J. Beck	B310	Further revise draft objection to CATL claim (1.9)	1.90	2,755.00
11/20/25	S. Schrag	B310	Confer with J. Beck regarding adversary proceeding and complaint.	0.30	330.00
11/20/25	G. Miller	B310	Call with V. Durrer re Expeditors claim.	0.20	250.00
11/20/25	G. Miller	B310	Further prepare stipulation and agreed order resolving RH Shipping claims.	0.60	750.00
11/20/25	V. Durrer	B310	Review proposed Voya settlement.	0.20	360.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

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11/20/25	V. Durrer	B310	Call with Voya counsel to finalize same.	0.20	360.00
11/21/25	S. Schrag	B310	Prepare Complaint against CATL.	4.60	5,060.00
11/21/25	G. Medina	B310	Review and revised caption per the request of T. Moyron and file FlexGen claims estimation motion.	0.40	210.00
11/22/25	S. Schrag	B310	Prepare complaint re CATL.	0.50	550.00
11/23/25	S. Schrag	B310	Prepare complaint re CATL (2.3); review and analyze materials in support (.3); conduct research in support of claims (2.5).	5.10	5,610.00
11/23/25	G. Miller	B310	Further prepare stipulation and agreed order resolving RH Shipping claims (1.3); Calls with R. Bajaj re same (.3).	1.60	2,000.00
11/24/25	S. Schrag	B310	Further prepare Complaint against CATL (3.3); conduct additional research in support (1.1).	4.40	4,840.00
11/24/25	G. Miller	B310	Further prepare and finalize stipulation and agreed order resolving RH Shipping claims.	1.10	1,375.00
11/24/25	G. Miller	B310	Prepare notice of settlements and finalize Welldex settlement.	2.80	3,500.00
11/24/25	G. Medina	B310	Received assemble and send to G. Miller RH Shipping Stipulation and file with the court.	0.40	210.00
11/26/25	S. Schrag	B310	Prepare complaint against CATL.	0.60	660.00
11/28/25	S. Schrag	B310	Prepare complaint against CATL.	1.00	1,100.00
11/30/25	S. Schrag	B310	Prepare complaint against CATL (1.5); conduct research in support of the same (.3); confer with J. Beck re the same (.1).	1.90	2,090.00
Task Total	B310 - Claims Administration and Objections			141.10	\$167,716.00

Task Code: B320 - Plan and Disclosure Statement (incl. Business Plan)

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/25	J. Beck	B320	Review draft plan settlement notice circulated by Committee (.4); analysis re ACE administrative claim settlement under plan (.2).	0.60	870.00
11/03/25	C. Doherty, Jr.	B320	Attention to language sent by CS Energy regarding plan.	2.70	2,970.00
11/03/25	V. Durrer	B320	Analysis re liquidation analysis (.3); analysis re ACE settlement (.1); revise Mainfreight settlement stipulation in connection with plan (.2)	0.60	1,080.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/04/25	T. Moyron	B320	Call with G. Uzzi, et al., regarding liquidation analysis and related matters (.3).	0.30	463.50
11/04/25	T. Moyron	B320	Correspond with C. Ucko, et al., regarding plan supplement (.6); coordination preparation of various exhibits (.2), analyze related notice and various exhibits (.3); correspond with G. Uzzi regarding ACE terms and proposed supplement (.1); analyze language with respect to payments to independent contractors under plan (.2).	1.40	2,163.00
11/04/25	T. Moyron	B320	Call with V. Durrer regarding plan releases (.1) and attention to requested documents (.2).	0.30	463.50
11/04/25	C. Doherty, Jr.	B320	Conduct research concerning plan supplement regarding employee payments.	0.70	770.00
11/04/25	G. Miller	B320	Review combined plan and disclosure statement and analysis re documents need to compile Plan Supplement (.9); Emails with V. Durrer and T. Moyron re same (.3).	1.20	1,500.00
11/04/25	G. Miller	B320	Prepare Contractor Payments Schedule as exhibit to Plan Supplement (1.7); Calls with C. Doherty and T. Moyron re same (.4).	2.10	2,625.00
11/04/25	G. Miller	B320	Prepare schedule of assumed contracts as exhibit to Plan Supplement and emails with G. Dunne re same.	0.70	875.00
11/04/25	G. Miller	B320	Call with G. Medina re retained causes of action (.2); analysis and preparation re schedule of retained causes of action as exhibit to Plan Supplement (2.2).	2.40	3,000.00
11/04/25	V. Durrer	B320	Analysis re proposed plan releases (.2); revise plan supplement re former employee payments (.2); call with U&L re plan issues (.7); follow up re ACE vote on plan (.1).	1.20	2,160.00
11/04/25	G. Medina	B320	Review request from G. Miller to draft schedule of retained causes (0.1); prepare a draft schedule (1.3); call with G. Miller regarding draft (0.2).	1.60	840.00
11/05/25	T. Moyron	B320	Meeting with V. Durrer, J. Beck, et al., regarding plan supplement and various documents to be finalized in connection with plan.	0.80	1,236.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

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11/05/25	T. Moyron	B320	Attention to plan supplement, including exhibit related to payments to independent contractors.	0.60	927.00
11/05/25	J. Beck	B320	Call with Dentons team regarding resolution of plan supplement and various documents to be finalized in connection therewith (.8)	0.80	1,160.00
11/05/25	C. Doherty, Jr.	B320	Review and respond to emails regarding motion related to plan (.1); review and respond to emails regarding plan supplement (.1).	0.90	990.00
11/05/25	G. Miller	B320	Further prepare schedule of retained causes of action re Plan Supplement and emails with Uzzi re same.	1.70	2,125.00
11/05/25	G. Miller	B320	Prepare Contractors Payments exhibit to Plan Supplement.	0.60	750.00
11/05/25	G. Miller	B320	Prepare notice of filing Plan Supplement.	1.20	1,500.00
11/05/25	G. Miller	B320	Prepare notice of settlements re ACE and WARN claims as exhibits to Plan Supplement.	0.20	250.00
11/05/25	V. Durrer	B320	Follow up call wiht U&L re plan filings (.9); follow up re revisions to plan supplement re same (.8); analysis re plan confirmation checklist (.7); analysis re liquidation budget (.1); analysis re revisions to plan supplement re payments to former employees (.2); analysis re voting summary (.1).	2.80	5,040.00
11/06/25	J. Beck	B320	Review and revise draft liquidating trust agreement (3.8); call with T. Moyron regarding plan voting (.1)	3.90	5,655.00
11/06/25	J. Beck	B320	Review and revise 9019 motion for approval of ACE settlement agreement	1.80	2,610.00
11/06/25	T. Moyron	B320	Analyze liquidation analysis and notes (.8); provide comments on call to G. Miller (.3); attention to plan supplement and open issues related to other documents to be attached as exhibits (1.4) and correspondence (.6) and calls regarding same (.3).	3.40	5,253.00
11/06/25	G. Miller	B320	Prepare schedule of retained causes of action as exhibit to Plan Supplement.	1.10	1,375.00
11/06/25	G. Miller	B320	Analyze and update liquidation analysis (2); Call with T. Moyron re same (.3).	2.30	2,875.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

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11/06/25	G. Miller	B320	Analysis re Plan Supplement and exhibits and compile the same (1); Call with T. Moyron re same (.2); Emails with Committee and Dentons team re same (.3).	1.50	1,875.00
11/06/25	G. Miller	B320	Prepare list of assumed contracts and unexpired leases as exhibit to Plan Supplement.	0.40	500.00
11/06/25	V. Durrer	B320	Update liquidation analysis re plan.	0.50	900.00
11/06/25	G. Medina	B320	Review request from C. Doherty and send August and September hearing transcripts (0.3).	0.30	157.50
11/07/25	J. Beck	B320	Call with K. Aulet regarding plan supplement (.2); call with Dentons and Brown Rudnick teams regarding finalizing plan supplement (.4); review revisions to direct claim trust documents (.5); assist with finalization of plan supplement documents and filing (2.2)	3.30	4,785.00
11/07/25	G. Miller	B320	Review and analysis re updated liquidation analysis.	0.20	250.00
11/07/25	G. Miller	B320	Further prepare payments to service providers exhibit to Plan Supplement.	0.60	750.00
11/07/25	G. Miller	B320	Further prepare schedule of retained causes of action exhibit to Plan Supplement.	0.40	500.00
11/07/25	G. Miller	B320	Finalize and compile Plan Supplement and related exhibits (1.4); Emails with Dentons, Uzzi and Committee teams re same (.7).	2.10	2,625.00
11/07/25	C. Doherty, Jr.	B320	Provide analysis and comments to plan supplement.	0.90	990.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

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11/07/25	G. Medina	B320	Call with G. Miller regarding filing plan supplements (0.1); create slip sheets and assemble and send all exhibits to G. Miller (0.7); correspond with G. Miller regarding Exhibit E (0.1); received new exhibits from J. Beck and replace exhibits C and D to plan supplements and send revised sent to G. Miller, T. Moyron, J. Beck, V. Durrer and C. Doherty (0.4); received and replace additional exhibits per the request of G. Miller (0.2); file notice of filing of plan exhibits (0.4); edit solicitation version of notice to include docket number of filed notice and send to G. Miller (0.2); correspond with Verita and send solicitation version of notice of filing plane exhibits for service (0.3); call with T. Moyron regarding amended notice and exhibits (0.1); review revised budget (0.2).	2.70	1,417.50
11/07/25	V. Durrer	B320	Revise plan supplement.	1.00	1,800.00
11/07/25	T. Moyron	B320	Analyze liquidation analysis (.6); analyze liquidating trust agreement and other exhibits to plan (1.2); analyze and finalize plan supplement and exhibits and correspond same (1.7).	3.50	5,407.50
11/07/25	T. Moyron	B320	Attention to amended wind-down budget (.2) and correspondence with U&L regarding same (.2); prepare correspondence to UCC advisors re same (.1).	0.50	772.50
11/07/25	J. Beck	B320	Review and revise 9019 motion to approval ACE settlement (1.2); draft settlement agreement for ACE settlement (1.4).	2.60	3,770.00
11/08/25	G. Medina	B320	Call and correspond with G. Miller regarding amended exhibits to plan supplements (0.2); correspond and send exhibits C and D to G. Miller (0.3); prepare and file Notice of filing of amended Plan Supplement with exhibits (0.4); prepare and correspond with Verita and send solicitation of the notice with exhibits for service (0.5).	1.40	735.00
11/09/25	V. Durrer	B320	Follow up with F. Oswald re plan supplement.	0.10	180.00

DENTONS

Client: Powin, LLC

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December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/10/25	J. Beck	B320	Call with Dentons and Uzzi teams regarding task list for open items leading to confirmation	0.50	725.00
11/10/25	J. Beck	B320	Further revise 9019 motion and settlement agreement for ACE settlement based on comments from V. Durrer and T. Moyron (1.4); call with T. Moyron regarding same (.2)	1.60	2,320.00
11/10/25	D. Cook	B320	Email correspondence with V. Durrer concerning confirmation brief.	0.10	110.00
11/10/25	C. Doherty, Jr.	B320	Provide analysis regarding procedure for confirmation hearing.	0.60	660.00
11/10/25	V. Durrer	B320	Analysis re confirmation brief (.4); analysis re confirmation checklist (.5); analysis re motion in support of ACE plan settlement (.3)	1.20	2,160.00
11/11/25	T. Moyron	B320	Analysis regarding confirmation brief and related matters.	0.30	463.50
11/11/25	D. Cook	B320	Zoom conference with T. Moyron and V. Durrer concerning confirmation brief.	0.30	330.00
11/11/25	G. Miller	B320	Prepare amended exhibits to Plan Supplement.	0.90	1,125.00
11/12/25	H. Thomas	B320	Review schedules, claims register and company data to determine whether certain entity was properly served with notice of the plan and DS.	0.90	769.50
11/12/25	D. Cook	B320	Prepare brief in support of confirmation of chapter 11 plan (5.7); analysis of precedent in support of same (1.4).	7.10	7,810.00
11/12/25	G. Miller	B320	Emails with Committee re revised WARN exhibits to Plan Supplement.	0.20	250.00
11/12/25	G. Miller	B320	Further prepare amended Plan supplement exhibits and file same.	0.40	500.00
11/12/25	V. Durrer	B320	Call with A. Zatz re release issues.	0.10	180.00
11/12/25	T. Moyron	B320	Call with D. Person re pending matters.	0.20	309.00
11/12/25	T. Moyron	B320	Attention to ACE settlement and related emails with U&L, et al.	0.30	463.50
11/12/25	J. Beck	B320	Attention to ACE admin claim settlement (.3).	0.30	435.00
11/13/25	H. Thomas	B320	Analysis regarding plan confirmation checklist (.7); correspondence re plan (.1); correspondence with party regarding inquiry into solicitation materials (.1).	0.90	769.50

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/13/25	S. Schrag	B320	Analysis re upcoming plan items (.3).	0.30	330.00
11/13/25	J. Beck	B320	Call with Dentons teams regarding outstanding items leading to confirmation	0.50	725.00
11/13/25	J. Beck	B320	Call with V. Durrer and T. Moyron regarding ACE and WARN settlement agreements under plan (.5); review and revise WARN settlement agreement (.2); review and revise ACE settlement agreement (.5)	1.20	1,740.00
11/13/25	D. Cook	B320	Further prepare brief in support of confirmation of chapter 11 plan.	7.30	8,030.00
11/13/25	G. Miller	B320	Finalize and file notice of amended exhibits to Plan Supplement.	0.60	750.00
11/13/25	T. Moyron	B320	Analysis regarding outstanding matters to address in connection with plan.	0.50	772.50
11/13/25	T. Moyron	B320	Attention to ACE settlement and provide comments thereon (.4); analyze emails from T. Walsh, J. Beck, et al., re same (.3).	0.70	1,081.50
11/13/25	G. Medina	B320	Review request from G. Miller and prepare and send notice of filing amended exhibits to amended plan supplement (0.4); File plan supplement and coordinate with Verita regarding service (0.3).	0.70	367.50
11/13/25	C. Doherty, Jr.	B320	Prepare for and attend calls regarding lead-up to Plan confirmation and strategy.	0.70	770.00
11/13/25	V. Durrer	B320	Call with client re open plan issues (.5); analysis re ACE settlement re plan (.2); analysis re RH plan settlement (.1).	0.80	1,440.00
11/14/25	D. Cook	B320	Further prepare brief in support of confirmation of chapter 11 plan (6.3); circulate same to T. Moyron, V. Durrer, and J. Beck for review (.1).	6.40	7,040.00
11/16/25	J. Beck	B320	Further revise ACE settlement agreement and 9019 motion (1.2); discuss same with T. Moyron (.2); further revise settlement agreement with WARN (.3)	1.70	2,465.00
11/16/25	V. Durrer	B320	Finalize ACE settlement for plan.	0.10	180.00
11/17/25	H. Thomas	B320	Draft plan confirmation order.	1.70	1,453.50
11/17/25	H. Thomas	B320	Confer with Dentons and Uzzi & Lall teams regarding plan confirmation issues.	1.10	940.50



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December 12, 2025

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INVOICE #:

5001-1035913

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11/17/25	J. Beck	B320	Further revise ACE settlement documents based on comments from J. Uzzi (.8); coordinate finalization and collection of signature pages from parties (.5).	1.30	1,885.00
11/17/25	J. Beck	B320	Call with Uzzi and Dentons team regarding open items leading to plan confirmation (1.1); Draft confirmation order confirming plan (4.2)	5.30	7,685.00
11/17/25	C. Doherty, Jr.	B320	Attend team call regarding plan items (1.1); review and respond to emails regarding plan items and Nov. 25 hearing (.2).	1.30	1,430.00
11/17/25	V. Durrer	B320	Correspond with T. Walsh re ACE settlement (.1); follow up re RH settlement (.2); analysis re feasibility exhibit (.1); call with client re plan evidentiary presentation (1.0); correspond with equity advisors re confirmation order language (.1).	1.50	2,700.00
11/18/25	J. Beck	B320	Further review of plan confirmation order (1.2); Call with K. Kraft, T. Moyron and Griffine Dunne regarding Canada issues (.4)	1.60	2,320.00
11/18/25	C. Doherty, Jr.	B320	Review plan objections and administrative request from FlexGen (.3); attention to voting summary (.1).	0.20	220.00
11/18/25	G. Miller	B320	Review and revise voting declaration in support of confirmation.	1.40	1,750.00
11/18/25	E. Chew	B320	Review and revise confirmation order.	4.40	4,180.00
11/18/25	T. Moyron	B320	Analyze plan objections, reservation of rights and docket re confirmation (1.6); prepare correspondence with respect to responses thereto (.2); analysis re voting report (.2) and related emails from Verita, et al. (.2); attention to confirmation order and coordination of further preparation (.2); correspond with Committee advisors regarding releases (.2); attention to potential objection re FlexGen (.2); correspond with J. Mispagel, et al., re proposed revisions to confirmation order (.2).	3.00	4,635.00
11/19/25	J. Beck	B320	Further revise plan confirmation order based on changes from E. Chew (1.0); call with Latham team regarding FlexGen comments to plan and confirmation order (.6)	1.60	2,320.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/19/25	G. Miller	B320	Review UST objection to confirmation of plan and analysis of case law cited therein (2.6); prepare response to UST objection (1.8).	4.40	5,500.00
11/19/25	C. Doherty, Jr.	B320	Prepare inserts for confirmation reply (2.3); review and respond to emails regarding plan and Nov. 25 hearing (.4).	2.70	2,970.00
11/19/25	T. Moyron	B320	Meeting with UCC advisors re plan confirmation (.7); meeting with U&L team re same (1.2); analysis of FlexGen requested plan language (.4); analysis of requested discovery re plan (.2); correspond with D. Person re agenda (.1) and attention to same (.1); analyze correspondence from Chambers regarding status conference and forward to same to UCC advisors and FlexGen advisors (.1); prepare memo re most updated status of plan settlements for U&L team (.2).	3.00	4,635.00
11/19/25	T. Moyron	B320	Correspondence with Mayer Brown, UCC advisors, et al. re Liquidating Trust Agreement language changes (.2); further attention to proposed FlexGen plan language (.3) and correspondence with UCC advisors regarding same and extension (.1); analyze confirmation order (.4) and prepare email to UCC advisors re same (.1); analyze objections and coordinate replies thereto (.7); analyze and provide comment on confirmation brief (1.6); correspond with UCC advisors re DTE (.2); attention to email from Verita re voting declaration (.2).	3.80	5,871.00
11/19/25	E. Chew	B320	Further revisions to confirmation order.	1.80	1,710.00
11/19/25	G. Medina	B320	Review and forward limited confirmation objection to T. Moyron, J. Beck, C. Doherty, E. Chew, D. Cook, H. Thomas, S. Schrag and V. Durrer (0.2);	0.20	105.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/19/25	V. Durrer	B320	Analysis re FlexGen discovery re plan (.1); call with UCC advisors re plan confirmation (.7); call with U&L team re same (1.2); revise FlexGen requested plan language (.3); analysis re same (.2); follow up with FlexGen advisors re same (.1); call with G. Uzzi re same (.1).	2.70	4,860.00
11/19/25	V. Durrer	B320	Analysis re FlexGen discovery re plan (.1); call with UCC advisors re plan confirmation (.7); call with U&L team re same (1.2); revise FlexGen requested plan language (.3); analysis re same (.2); follow up with FlexGen advisors re same (.1); call with G. Uzzi re same (.1).	2.70	4,860.00
11/20/25	T. Moyron	B320	Meeting with U&L, V. Durrer, et al., regarding FlexGen, claims, payments on the effective date (1.0) and follow-up emails and call with V. Durrer (.3); attention to agenda (.2), confirmation order (.6); meeting with V. Durrer and G. Miller regarding UST plan objection, confirmation brief and timing on related matters and objections (.6).	2.70	4,171.50
11/20/25	T. Moyron	B320	Status Conference with Court, BR, FlexGen and other parties regarding upcoming hearing, logistics and outstanding issues (.6) and follow up all with V. Durrer (.2); analyze language proposed by FlexGen, updated language in response, and analyze plan in connection therewith (.4) and call with V. Durrer re same (.2); analyze emails from Latham, BR, et al., re same (.3); analyze remaining objections and related issues (.2) and correspond with V. Durrer, et al., re same (.1); attention to requested discovery from FlexGen and other FlexGen items (.4).	2.40	3,708.00
11/20/25	H. Thomas	B320	Draft declaration in support of plan feasibility and confirmation.	0.40	342.00



Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/20/25	G. Miller	B320	Further prepare voting declaration in support of confirmation (.3); further prepare response to UST objections to confirmation and research re same (4.7); call with V. Durrer and T. Moyron re plan issues and analysis re going forward strategy (.6); call with Uzzi and Dentons teams re FlexGen issues and going forward strategy (1.3).	6.90	8,625.00
11/20/25	C. Doherty, Jr.	B320	Prepare responses to discovery requests from FlexGen (1.4); prepare draft and supervise assembly of witness and exhibit list (.5); Review and respond to emails and provide analysis and prepare work product regarding items set for hearing on November 25 (1.7); prepare for and attend status conference with court (.3).	3.90	4,290.00
11/20/25	E. Chew	B320	Review and revise confirmation brief.	3.60	3,420.00
11/20/25	G. Medina	B320	Review and send joint plan and disclosure statement per the request of T. Moyron (.2); correspond with C. Doherty regarding exhibits and witness list for confirmation (.2).	0.40	210.00
11/20/25	V. Durrer	B320	Revise FlexGen proposed confirmation language (.1); call with A. Togut re confirmation hearing (.2); analysis re effective date sources & uses (.1); correspond with K. Aulet re same (.1); call with J. Uzzi re plan confirmation issues (.2); attend status conference requested by chambers (.4); analysis re same (.1); call with Uzzi re hearing prep (1.4); revise agenda (.2); revise witness list (.2); finalize effective date sources & uses (.3).	4.20	7,560.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/21/25	T. Moyron	B320	Analyze updated estimation motion (.6) and related issues (.5); analyze prior lien notice (.1); call with M. Garms and V. Durrer regarding same and APA (.3); correspond with Committee advisors regarding updated motion (.2); call with M. Sawyer and V. Durrer regarding further updates to estimation motion (.3); update motion (.3); and prepare email to Committee advisors attaching further updated motion (.1); analyze, prepare and finalize confirmation brief (5.8); analyze sources and uses (.2); correspond with U&L regarding same (.3); calls with C. Ucko and S. Zimmerman regarding same (.2); analyze updated sources and uses and provide comment thereon (.2); analyze declaration in support of plan confirmation and provide comments thereto (1.6); correspondence (.3), calls with G. Uzzi (.2) and H. Thomas (.4) regarding same; provide further comments to declaration (.6); correspondence with G. Uzzi re declaration (.2); analyze FlexGen limited objection to plan (.2); correspond with C. Doherty, et al., regarding exhibit list (.2); analyze and prepare witness and exhibit list (.2).	13.00	20,085.00
11/21/25	H. Thomas	B320	Draft declaration in support of plan feasibility and confirmation.	4.70	4,018.50
11/21/25	J. Beck	B320	Review and revise confirmation order in connection with plan (1.8); multiple calls with C. Doherty regarding confirmation order language to resolve various objections (.3); review and comment on confirmation brief in support of plan (1.3); review and revise Uzzi declaration in support of the plan (1.1); multiple calls with T. Moyron regarding same (.4);	4.90	7,105.00
11/21/25	G. Miller	B320	Further prepare response to UST objections to confirmation (2.2); review draft proposed confirmation order and prepare same (.4); review draft brief in support of confirmation of Plan and finalize same for filing (2.5).	5.10	6,375.00

DENTONS

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Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/21/25	C. Doherty, Jr.	B320	Prepare and serve discovery responses to FlexGen (.6); prepare analysis and work product for plan documents, including providing comments for confirmation brief, order and witness and exhibit list (3.0).	3.60	3,960.00
11/21/25	E. Chew	B320	Revise and file confirmation brief.	7.00	6,650.00
11/21/25	G. Medina	B320	Prepare, assemble and send to C. Doherty for review the exhibits to the debtors' witness and exhibit list (1.0); correspond with C. Doherty regarding exhibits (0.2); correspond with T. Moyron regarding confirmation brief (0.1); call with T. Moyron regarding edits to brief and file confirmation brief (0.2); correspond with Verita regarding service of confirmation brief (0.1); correspond with H. Thomas and file Declaration of Gerard Uzzi in support of Confirmation (0.3); prepared exhibit sheets for all exhibits and assembled exhibits for filing Debtors' witness and exhibit list for confirmation (0.8); finalized and filed the debtors' witness and exhibit List (0.6); call with T. Moyron regarding FlexGen limited objection and send to T. Moyron, V. Durrer, J. Beck, G. Miller and C. Doherty (0.2).	3.50	1,837.50
11/21/25	V. Durrer	B320	Revise confirmation brief (1.5); revise confirmation declarations (1.7); review evidentiary materials for confirmation hearing (1.4); call with J. Sponder re UST objection (.1); call with G. Uzzi re plan objections (.2); call with Togut re confirmation hearing (.2); call with Huron re upcoming confirmation hearing (.1); call with S. Zimmerman re confirmation hearing (.1); call with B. Kane re evidentiary (.2); call with J. Schwartz re FlexGen request (.1); correspond with Latham re settlement proposal (.3).	5.90	10,620.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/22/25	T. Moyron	B320	Call with V. Durrer, et al., regarding upcoming confirmation hearing, planning, and related matters (.5); correspondence with FlexGen's counsel regarding meeting (.2); call with FlexGen's counsel regarding potential resolution (.2), and call with V. Durrer thereafter re same (.2); correspondence with Committee counsel regarding FlexGen (.2); call with V. Durrer thereafter (.1) and correspondence with G. Uzzi regarding same (.2); correspondence regarding motion to shorten re estimation motion (.1) and call with C. Ribeiro re same (.1).	1.80	2,781.00
11/22/25	J. Beck	B320	Call with J. Uzzi regarding approach to Canadian entities under plan.	0.30	435.00
11/22/25	C. Doherty, Jr.	B320	Team call regarding confirmation hearing preparation and strategy (.6); prepare comments to agenda for hearing (.2).	0.80	880.00
11/22/25	G. Miller	B320	Analysis re open issues re confirmation hearing.	0.60	750.00
11/22/25	V. Durrer	B320	Call with Latham re possible settlement of plan objection (.5); correspond with UCC advisors re same (.1); review and revise hearing agenda for confirmation (.7); call with G. Uzzi re Latham call (.3); prepare memo re same (.8); call with UCC advisors re same (.3); follow up re same (correspond with Avalon counsel re call re confirmation (.1)) follow up re UST comments and objections (.2); call with J. Schwartz re confirmation issues (.1); continue preparation for hearing (.3).	3.90	7,020.00
11/22/25	G. Medina	B320	Strategy call regarding Agenda and confirmation hearing (0.4); send declaration of S. Calderon to T. Moyron regarding tabulation (0.2); retrieve and send first day transcript to V. Durrer per his request (0.2); review and edit agenda per the request of T. Moyron and file (0.9).	1.70	892.50
11/23/25	J. Beck	B320	Call with T. Moyron regarding confirmation order (.1); review and revised confirmation order based on additional negotiations with various parties (1,2)	1.30	1,885.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/23/25	S. Schrag	B320	Confer with T. Moyron re US Trustee objection (.1); review and analyze US Trustee objection to plan (.7).	0.80	880.00
11/23/25	C. Doherty, Jr.	B320	Prepare work product and provide analysis for Nov. 25 hearing.	0.60	660.00
11/23/25	G. Miller	B320	Prepare notice of amended wind down budget.	0.50	625.00
11/23/25	G. Miller	B320	Review and analysis re proposed plan language from UST.	0.30	375.00
11/23/25	V. Durrer	B320	Prepare personal notes for confirmation hearing presentation (3.0); analysis re UST memo re confirmation (.4) revise FlexGen proposed confirmation order language (2.3); prepare memo to UCC advisors re same (.1); call with G. Uzzi re same (.3).	6.10	10,980.00
11/23/25	G. Medina	B320	Retrieve and send UST objection to V. Durrer per his request (0.2); correspond with T. Moyron regarding items for confirmation hearing and plan supplements filed (0.4); correspond with G. Miller regarding filing of amended plan supplement and prepare and send (0.3); file amended initial budget (0.2); create electronic binders and materials for Office Services to prepare and assemble in advance of the confirmation hearing, and send the list of binders to C. Doherty for review (1.5)	2.60	1,365.00
11/23/25	T. Moyron	B320	Meet with V. Durrer regarding resolution of FlexGen issues and other open items regarding confirmation re confirmation order.	2.30	3,553.50
11/23/25	T. Moyron	B320	Correspond regarding confirmation order language (.8); and timing of filing of same (.3); correspond with U&L re budget (.2); analyze and provide comment on notice re plan supplement re amended budget (.3); analyze and provide comment to motion to shorten and provide further comment on updated motion to shorten re FlexGen (.9) and correspond with Togut team, et al., re same (.6).	3.10	4,789.50
11/24/25	T. Moyron	B320	Analyze ACE settlement in connection with upcoming hearing.	0.20	309.00



Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/24/25	T. Moyron	B320	Analyze confirmation order and various redlines (1.2); confer with Committee counsel re insurance re CES re confirmation order (.3); meeting with J. Beck and V. Durrer regarding confirmation order (.7); analyze updated order and redlines (.4); further meetings with J. Beck and provide comment re confirmation order (.2); further emails from F. Barbosa, et al re CES (.2); analyze issues related to objections from UST (.3); correspondence from J. Sponder, et al., regarding same (.2); meeting with V. Durrer regarding same (.4); and call with Verita (.1) and J. Sponder regarding same (.2); correspond regarding releases for C. Paulson and B. Kane (.3); analyze confirmation order and provide comment thereon with respect to same (.2); analyze email from Committee advisor and proposed cooperation agreement (.2); additional emails regarding proposed language re insurance (.2); analyze email from Verita re votes and related detail (.1).	5.20	8,034.00
11/24/25	J. Beck	B320	Further review and revise confirmation order to incorporate comments from team and resolutions with numerous parties, including FlexGen, DTE, UST, customers and sureties (5.2); meet with T. Moyron and V. Durrer regarding confirmation order (.7); call with FlexGen regarding status of settlement (.5); discuss customer issues with C. Doherty (.4); prepare for presentation at confirmation hearing on the motion (1.0); meet with team regarding open issues on plan confirmation (1.0)	8.80	12,760.00
11/24/25	S. Schrag	B320	Attend Rite Aid confirmation hearing for insights on US Trustee objection and court's outcome for comparison to Powin outcome (2.4); prepare summary of Court's ruling on the same (.5); confer with G. Miller re the same (.2).	3.10	3,410.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/24/25	C. Doherty, Jr.	B320	Prepare analysis and work product for November 25 hearing, including organizing documents and evidence, providing comments and review of confirmation order.	1.60	1,760.00
11/24/25	G. Miller	B320	Analysis re Liquidating Trustee as nominal party to pending litigation.	0.50	625.00
11/24/25	G. Miller	B320	Review and analysis re UST objections to confirmation.	0.30	375.00
11/24/25	V. Durrer	B320	Analysis re response to objection re EKS filing (.2); call with L. Kanzer re confirmation issues (.1); finalize remarks for hearing (1.0); call with Sponder re narrowing issues (.8); analysis re witness and exhibit issues (.4); finalize preparations for confirmation hearing (1.8).	4.30	7,740.00
11/24/25	G. Medina	B320	Correspond with office services and send instructions to create binders and additional materials for confirmation hearing (0.7); send filed confirmation brief to T. Moyron per her request (0.1); correspond with J. Beck regarding confirmation order (0.1); send UST confirmation objection her her request (0.1); Correspond with T. Moyron regarding C. Paulson Zoom participation at confirmation hearing and coordinate with chambers regarding his appearance (0.4); review request from G. Miller and assemble and send FlexGen Settlement agreement for Welldex- Pine Gate Inventory (0.3); review confirmation order and correspond with J. Beck regarding surety settlement language (0.4); met with C. Doherty regarding confirmation materials needed (0.4); file confirmation order (0.3); reviewed confirmation binders received and all related materials, organized and supplemented the contents as needed, printed and assembled additional materials, including confirmation orders and redlines (5.4).	8.20	4,305.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/25/25	J. Beck	B320	Review substantive documents for agenda matters to be handled at hearing (2.2); Various discussions with multiple parties and Debtor teams in connection with in the confirmation hearing (.5); attend and participated in confirmation hearing (1.5); review and revise draft confirmation order (.8); call with E. Chew regarding same (.1); call with Geoff Miller regarding comments to revised order (.1); discuss revised order with T. Moyron (.2)	5.40	7,830.00
11/25/25	T. Moyron	B320	Meetings prior to hearing related to confirmation hearing and open issues (1.6); participate in hearings on Confirmation, ACE settlement, WARN settlement, and other agenda matters (1.8).	3.40	5,253.00
11/25/25	T. Moyron	B320	Analyze order and various redlines and updated language (.8); correspondence with parties, J. Beck, et al., regarding same (.6).	1.40	2,163.00
11/25/25	S. Schrag	B320	Participate in hearing to confirm plan and related issues.	1.70	1,870.00
11/25/25	E. Chew	B320	Revise confirmation order based on discussions with UST and other parties.	2.30	2,185.00
11/25/25	C. Doherty, Jr.	B320	Prepare for and attend confirmation hearing (2.0); negotiate and discuss hearing and issues with counsel for customers before hearing (.3).	2.30	2,530.00
11/25/25	G. Miller	B320	Review amended agenda re confirmation hearing (.2); review and revise confirmation order (.8); attend confirmation hearing (1.7); finalize and submit proposed agreed orders resolving RH Shipping and Mainfreight claims (.3).	3.00	3,750.00
11/25/25	V. Durrer	B320	Call with J. Brecker re confirmation (.1); correspond with FlexGen re settlement (.1); correspond with chambers re amended agenda (.1); revise agenda (.2); correspond with UST (.1); meet with team and witnesses re final preparations for hearing (1.3); meet with J. Sponder re same (.2); participate in plan confirmation hearing (1.8); correspond with UST re confirmation Order (.1).	4.00	7,200.00



Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/26/25	H. Thomas	B320	Finalize orders on WARN settlement motion and correspondence with parties in interest regarding same (.3); finalize confirmation order and correspondence with J. Beck and E. Chew regarding same (.4); finalize ACE settlement order and correspondence with J. Beck, G. Medina, T. Moyron, and Committee regarding same (.3)	1.00	855.00
11/26/25	E. Chew	B320	Continue to incorporate edits to the confirmation order; draft notice re filing of confirmation order.	2.40	2,280.00
11/26/25	G. Miller	B320	Calls and emails with R. Bajaj re language in confirmation order addressing FlexGen settlements and open issues.	0.40	500.00
11/26/25	V. Durrer	B320	Revise confirmation order.	0.70	1,260.00
11/26/25	G. Medina	B320	Review request from G. Miller and send Direct Trust agreement and Liquidating Trust Agreement to G. Miller, J. Beck and E. Chew (0.2); correspond with J. Beck regarding submission of orders to chambers (0.1); retrieve and send Solicitation version of DS and send to E. Chew (0.2); remove and replace correct Confirmation order and send to J. Beck for review (0.3); file notice of revised confirmation order (0.3); submit confirmation order, Stipulation with Mainfreight and Stipulation, agreed order Regarding R.H. Shipping and Order preliminarily approving WARN Settlement to chambers (0.4);	1.50	787.50
11/26/25	T. Moyron	B320	Attention to confirmation order, orders on ACE, WARN, Mainfreight, RH, etc., notices and other final comments to same and finalization to submit to Chambers and related correspondence.	2.80	4,326.00
11/26/25	J. Beck	B320	Continue to compile comments from parties to confirmation order and additional review prior to finalizing (1.3); review comments to confirmation order from UST and internal discussion regarding same (.2); coordinate finalizing and submitting confirmation order to chambers (.8);	2.30	3,335.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/30/25	J. Beck	B320	Review ACE 9019 order regarding comments from Steptoe	0.30	435.00
11/30/25	V. Durrer	B320	Correspond with T. Walsh re consummation of plan (.1); analysis re ACE settlement order in connection with plan (.1).	0.20	360.00
Task Total	B320 - Plan and Disclosure Statement (incl. Business Plan)			309.20	\$403,129.00

Task Code: CUST - Customer Issues

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/25	C. Doherty, Jr.	CUST	Obtain information from client and prepare response to subpoena (.3); review and respond to emails regarding customer inquiries (.1).	0.40	440.00
11/03/25	V. Durrer	CUST	Analysis re customer invoicing for ROC usage.	0.10	180.00
11/04/25	C. Doherty, Jr.	CUST	Obtain information from client and negotiate and prepare response to subpoena (.5); review and respond to emails regarding customer inquiries (.1).	0.60	660.00
11/05/25	C. Doherty, Jr.	CUST	Prepare response to emergency motion and joinders (.8); attention to emails regarding customer document requests (.1).	0.90	990.00
11/06/25	C. Doherty, Jr.	CUST	Prepare response to Motion to Compel Warranties (.9); review and respond to emails from customers concerning information requests and customer contested matters (.2).	1.10	1,210.00
11/06/25	V. Durrer	CUST	Analysis re warranty transfer issues.	0.10	180.00
11/07/25	C. Doherty, Jr.	CUST	Prepare response to Motion to Compel Warranties.	0.60	660.00
11/10/25	C. Doherty, Jr.	CUST	Respond to customer emails and provide analysis regarding Nov. 25 hearing regarding customer issues.	0.20	220.00
11/10/25	V. Durrer	CUST	Correspond with J. Cooper re postponement of November 13 hearing.	0.10	180.00
11/11/25	C. Doherty, Jr.	CUST	Provide Analysis regarding various customer objections set for hearing on November 25th (1.4); prepare draft of objection to warranty assignment motion (1.2); review and respond to emails regarding information requested from customers (.1).	2.70	2,970.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/12/25	H. Thomas	CUST	Proofread and revise response to warranty motion and joinders and correspondence with C. Doherty regarding same.	0.40	342.00
11/12/25	C. Doherty, Jr.	CUST	Prepare objection to warranty motion (1.7); provide analysis regarding customer inquiries and customer issues for Nov. 25 hearing (.2).	1.90	2,090.00
11/14/25	C. Doherty, Jr.	CUST	Review and respond to emails from counterparties on warranty issues.	0.10	110.00
11/16/25	V. Durrer	CUST	Finalize customer warranty proposal.	0.10	180.00
11/17/25	C. Doherty, Jr.	CUST	Prepare draft of response to motion to compel enforcement of warranties (.6); review and respond to emails concerning counterparty inquiries and objections (.5).	1.10	1,210.00
11/17/25	V. Durrer	CUST	Revise response to customer warranty motion.	0.20	360.00
11/17/25	G. Medina	CUST	Correspond with D. Person and C. Doherty regarding Licensee matter and agenda (0.4).	0.40	210.00
11/18/25	C. Doherty, Jr.	CUST	Finalize and supervise filing of response to motion to compel assignment of warranties (.7); review and respond to emails regarding counterparty matters related to Nov. 25 hearing (.8).	1.50	1,650.00
11/18/25	G. Medina	CUST	Correspond with C. Doherty and review and file Response to Warranty Motion.	0.50	262.50
11/19/25	C. Doherty, Jr.	CUST	Communicate with customer counsel regarding resolving motion to compel warranties and related joinders and issues.	2.10	2,310.00
11/19/25	V. Durrer	CUST	Analysis re hearing on warranty issues.	0.10	180.00
11/19/25	V. Durrer	CUST	Analysis re hearing on warranty issues.	0.10	180.00
11/20/25	C. Doherty, Jr.	CUST	Negotiate and respond to customers and counterparties regarding items set for Nov. 25 hearing and provide analysis regarding same (2.4); prepare and supervise assembly and filing of witness and exhibit list for warranty motion (.8).	3.20	3,520.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/20/25	G. Medina	CUST	Correspond with C. Doherty and prepare and send exhibits to witness and list related to warranty motion (0.4); assemble and file debtors' witness and exhibit list for hearing on motion of ad hoc customer group compelling the debtors to assign OEM warranties (0.3).	0.70	367.50
11/20/25	V. Durrer	CUST	Analysis re V&E settlement (.1); analysis re quit claim assignment (.2); call with L. Kanzer re same (.2); analysis re Mayer Brown issues (.2); call with R. Stieglitz re same (.1); review V&E exhibit list (.1).	0.90	1,620.00
11/21/25	C. Doherty, Jr.	CUST	Negotiate and respond to customers and counterparties regarding items set for Nov. 25 hearing and provide analysis regarding same, including moving forward negotiations and approvals of quitclaim forms.	3.30	3,630.00
11/24/25	C. Doherty, Jr.	CUST	Negotiate and respond to customers and counterparties regarding items set for Nov. 25 hearing and provide analysis regarding same, including moving forward negotiations and approvals and, as applicable, finalization and execution of quitclaim forms (4.9); update tracker regarding customer items (.4).	5.30	5,830.00
11/24/25	V. Durrer	CUST	Analysis re outcome of customer warranty settlements.	0.70	1,260.00
11/26/25	C. Doherty, Jr.	CUST	Review and respond to emails regarding customer inquiries regarding quitclaim assignments and provide instruction regarding same.	0.70	770.00
Task Total CUST - Customer Issues				30.10	\$33,772.00

Task Code: EMP - Employee matters

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/25	C. Doherty, Jr.	EMP	Prepare for and attend call with creditor regarding employee benefits (.5).	0.50	550.00
11/03/25	V. Durrer	EMP	Call with Voya counsel re pending pre-and post-petition claim allegations (.3); correspond with K. Aulet re CATL claim impact on China employee matters (.1)..4	0.40	720.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/04/25	T. Moyron	EMP	Correspond with P. Jiang, et al., regarding meeting (.1).	0.10	154.50
11/04/25	S. McCandless	EMP	Review proposed employee Plan Supplement payment language and various related prior communications forwarded by T. Moyron (.70); communicate with T. Moyron regarding implications of contractor status (.20).	0.90	1,165.50
11/05/25	S. McCandless	EMP	Communicate with Dentons and Uzzi teams regarding status of individuals to receive payments as contractors rather than employees (.40); provide related form of agreement (.20); revise insert for Plan Supplement regarding the payments to be made (.80); forward same to Dentons team with related comments (.20); communicate with G. Miller regarding same and review related updated draft (.30).	1.90	2,460.50
11/06/25	T. Moyron	EMP	Correspond with P. Jiang regarding meeting re China. (.2).	0.20	309.00
11/11/25	T. Moyron	EMP	Attention to emails from P. Jiang re China.	0.20	309.00
11/13/25	V. Durrer	EMP	Analysis re open China labor issues (.8); call with G. Uzzi re same (.1).	0.90	1,620.00
11/14/25	S. McCandless	EMP	Review various information related to contractors forwarded by C. Ucko (.50); respond to same (.40); conference call with C. Ucko and then joined by T. Moyron to discuss same (.60); review and consider related communication from G. Miller regarding severance language attached to plan supplement (.40); review related questions from C. Ucko (.20); respond to same (.30); review related communications between A. Pacheco and C. Ucko (.40); review related documentation forwarded by C. Ucko and related questions in preparation for further conference call (.70); respond regarding same (.20).	3.70	4,791.50
11/17/25	T. Moyron	EMP	Call with J. Uzzi, P. Jiang, et al., regarding CATL, Finway, Quindao, and considerations related to liquidation and litigation.	1.00	1,545.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/17/25	T. Moyron	EMP	Call with G. Uzzi, A. Pachelo, et al., regarding various payments to contractors/former employees (.5) and related correspondence (.2).	0.70	1,081.50
11/17/25	S. McCandless	EMP	Communicate with T. Moyron and V. Durrer regarding payments to contractors and related implications (.30); conference call with C. Ucko, S. Zimmerman, and A. Pacheco to discuss pending matters regarding contractors and follow up to same (.60); report to T. Moyron and V. Durrer regarding same (.40); review C. Ucko's summary of same and list of items to discuss on further call with J. Uzzi and T. Moyron (.30); review initial response from J. Uzzi (.10); further conference call with J. Uzzi, C. Ucko, A. Pacheco, S. Zimmerman, and T. Moyron for further discussion of and decision on same (.50); communicate with T. Moyron following same (.10).	2.30	2,978.50
11/20/25	T. Moyron	EMP	Attention to CATL (.2) and emails from J. Pascal re China (.2).	0.40	618.00
11/21/25	S. McCandless	EMP	Review communications from G. Uzzi and C. Ucko regarding payments to contractors.	0.70	906.50
Task Total	EMP - Employee matters			13.90	\$19,209.50

Task Code: INS - Insurance

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/25	V. Durrer	INS	Continue to follow up on insurance issues.	0.10	180.00
11/22/25	G. Miller	INS	Review presentation re modification of insurance program and email J. Sponder re same.	0.50	625.00
Task Total	INS - Insurance			0.60	\$805.00

Task Code: REP - Reporting/Schedules

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/25	G. Miller	REP	Review amended schedules and SOFA.	0.10	125.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/25	V. Durrer	REP	Draft letter to chambers re EKS (.4); follow up with chambers re same (.1); follow up with F. Oswald and K. Aulet re same (.1); review correspondence from chambers re same (.1); call wiht client re updating statement of assets and liabilities (.3)	1.00	1,800.00
11/03/25	G. Medina	REP	Correspond with D. Person and foward UST correspondence regarding Powin EKS SellCo, LLC's OSC hearing (0.2); correspond with chambers and F. Oswald regarding order to show cause hearing related to Powin EKS SellCo, LLC (0.2).	0.40	210.00
11/04/25	S. Schrag	REP	Review correspondence from T. Moyron and G. Miller re Schedules and SOFAs (.2); analyze changes (.2); prepare notice of amended Schedules and SOFAs (.5).	0.90	990.00
11/04/25	T. Moyron	REP	Correspond with D. Intrieri, et al., re amended SOALs and SOFAs (.2).	0.20	309.00
11/04/25	G. Miller	REP	Review and comment re amended schedules and statements.	1.00	1,250.00
11/05/25	J. Beck	REP	Review and revise draft amended SOFAs and SOALs	1.10	1,595.00
11/05/25	S. Schrag	REP	Confer with T. Moyron re notice of amended schedules and SOFAs.	0.10	110.00
11/06/25	J. Beck	REP	Further review amended schedules and SOFAs and correspondence regarding same and cover sheet related thereto (1.3); coordinate execution and filing of amended schedules (.5)	1.80	2,610.00
11/06/25	T. Moyron	REP	Attention to amended SOAL/SOFAs and filings (.4); and correspondence regarding same (.3).	0.70	1,081.50



Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/06/25	G. Medina	REP	Review request form V. Durrer and send docket notation regarding Powin ESK SellCo order to show cause and coordinated with docketing to calendar date (0.4); prepare, assemble and filed notice of amended abandonment order and send to chambers (0.5); review request from J. Beck and assemble Amended SOFA and SOAL for Powin, LLC and SOAL for Powin Energy Operating Holdings LLC (0.5); edit amended SOFA and SOALs and send to J. Beck for review (0.4); file amended SOFA and SOALs (0.6).	2.40	1,260.00
11/13/25	G. Miller	REP	Prepare global notes re EKS schedules and statements.	0.80	1,000.00
11/14/25	G. Miller	REP	Prepare global notes re EKS schedules and statements.	0.80	1,000.00
11/17/25	T. Moyron	REP	Attention to global notes re amendments re SOAL/SOFAs.	0.20	309.00
11/20/25	G. Miller	REP	Prepare EKS Global Notes and email D. Intrieri re same.	1.40	1,750.00
11/21/25	T. Moyron	REP	Correspond with U&L regarding MORs (.2); analyze notes and MORs (.2).	0.40	618.00
11/21/25	G. Medina	REP	Receive and compile MORs for all debtors and send to T. Moyron, R. Bajaj, S. Sucharitha and G. Miller (1.1); file MORs for all debtors and correspond with Verita regarding service (0.6);	1.70	892.50
11/24/25	T. Moyron	REP	Correspond regarding EKS SOAL and SOFAs and related matters.	0.20	309.00
11/24/25	G. Miller	REP	Review EKS schedules and statements and calls with D. Intrieri re same.	0.40	500.00
11/25/25	G. Miller	REP	Review EKS schedules and statements and call with D. Intrieri re same.	0.30	375.00
11/25/25	D. Thomas-Nichols	REP	Finalize and file schedules of assets and liabilities for Powin EKS Sellco, LLC (.2); finalize and file statement of financial affairs for Powin EKS Sellco, LLC (.1); correspondence with team with filed schedules and SOFA (.1)	0.40	210.00
Task Total	REP - Reporting/Schedules			16.30	\$18,304.00

DENTONS

Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

Task Code: WARNACT - WARN Act Issues

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/06/25	T. Moyron	WARNACT	Prepare email to WARN counsel re plan supplement (.1).	0.10	154.50
11/07/25	D. Cook	WARNACT	Analysis concerning WARN settlement precedent (.6); email communication with T. Moyron concerning same (.1); follow up email communication with J. Beck concerning same (.1).	0.80	880.00
11/07/25	T. Moyron	WARNACT	Attention to 9019 motion and related matters.	0.40	618.00
11/07/25	J. Beck	WARNACT	Call with WARN claimants regarding WARN settlement documentation (.3)	0.30	435.00
11/10/25	V. Durrer	WARNACT	Analysis re pending settlement documentation to be filed.	0.10	180.00
11/11/25	V. Durrer	WARNACT	Analysis re WARN settlement.	0.10	180.00
11/12/25	T. Moyron	WARNACT	Attention to WARN settlement documents (.3) and correspondence with counsel (.2).	0.50	772.50
11/12/25	J. Beck	WARNACT	Review draft settlement agreement with WARN claimants (1.5)	1.50	2,175.00
11/13/25	T. Moyron	WARNACT	Analyze WARN settlement agreement and motion.	0.60	927.00
11/13/25	V. Durrer	WARNACT	Analysis re WARN settlement.	0.40	720.00
11/17/25	V. Durrer	WARNACT	Correspond with K. Aulet re WARN issues.	0.10	180.00
11/17/25	J. Beck	WARNACT	Review and revise WARN Act settlement agreement based on comments from the Committee (.5).	0.50	725.00
11/20/25	V. Durrer	WARNACT	Analysis re WARN settlement.	0.10	180.00
11/21/25	T. Moyron	WARNACT	Attention to WARN settlement, motion, and coordination of filing (.4); correspond with plaintiff's counsel, J. Beck, et al., re same (.3).	0.70	1,081.50
11/21/25	H. Thomas	WARNACT	Revise WARN settlement motion with Settlement Class Representatives (1.1); revise exhibits and proposed orders thereto (1.2) and draft declaration to accompany the settlement motion (.3).	2.60	2,223.00
11/21/25	J. Beck	WARNACT	Review and revise 9019 motion and related exhibits for approval of settlement with WARN claimants	2.30	3,335.00



Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/22/25	T. Moyron	WARNACT	Analyze and provide comment on G. Uzzi declaration in support of WARN (.4); correspond with H. Thomas (.3) and G. Uzzi (.1) regarding same; analyze 9019 motion and provide comment thereon (.8); correspond with H. Thomas regarding same (.3); calls with J. Beck regarding motion and settlement (.2) , call with J. Beck and plaintiff's counsel regarding same (.1) and follow up call with plaintiff's counsel (.1).	2.30	3,553.50
11/22/25	H. Thomas	WARNACT	Revise WARN settlement motion with Settlement Class Representatives (1.7); revise exhibits and proposed orders thereto (.5); draft declaration to accompany the settlement motion (1.2); proofread and finalize documents for filing (.7).	4.10	3,505.50
11/22/25	J. Beck	WARNACT	Review and revise draft Uzzi declaration in support of WARN settlement (1.5); call with Dentons team regarding status and open confirmation items (.5); further revise WARN settlement motion (.7); call with T. Moyron regarding Uzzi declaration (.1); further revise motion to shorten WARN settlement motion (.4); review additional comments to WARN documents from WARN counsel (.5); revise settlement agreement with WARN claimants and update motion documents to reflect changes (.8); call with R. Roupinian regarding changes to settlement agreement (.1); review and revise declaration from WARN counsel in support of 9019 motion (.4); finalize WARN documents and coordinate execution and filing thereof (1.8)	6.80	9,860.00

DENTONS

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December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Name</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/23/25	G. Medina	WARNACT	Correspond with J. Beck regarding WARN 9019 motion and related pleadings (0.2); prepare and assemble WARN 9019 motion with exhibits (0.7); receive corrected settlement agreement and resent for review (0.3); correspond with H. Thomas and replace proposed order (0.2); file the 9019 WARN Motion with exhibits file in the main case and adversary proceeding (0.7); Declaration of Gerard Uzzi In Support of Joint Motion Of Debtors and Class Representatives (0.4); application to Shorten Time (0.4); review and redline of FlexGen Settlement agreement and send to V. Durrer (0.4).	3.20	1,680.00
11/24/25	T. Moyron	WARNACT	Analyze WARN settlement in connection with upcoming hearing,	0.40	618.00
11/26/25	D. Thomas-Nichols	WARNACT	Review of hearing to determine fairness hearing date (.2); correspondence with J. Beck with fairness hearing date and time (.1).	0.30	157.50
Task Total WARNACT - WARN Act Issues				28.20	\$34,141.00

Timekeeper Summary:

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Doherty, Jr.	71.60	1,100.00	78,760.00
C. Doherty, Jr.	16.30	550.00	8,965.00
D. Cook	22.60	1,100.00	24,860.00
D. Thomas-Nichols	6.60	525.00	3,465.00
E. Chew	21.50	950.00	20,425.00
G. Medina	43.00	525.00	22,575.00
G. Medina	3.40	262.50	892.50
G. Miller	113.10	1,250.00	141,375.00
H. Thomas	47.60	855.00	40,698.00
J. Beck	80.80	1,450.00	117,160.00
J. Beck	5.50	725.00	3,987.50
R. Garms	7.90	830.00	6,557.00
S. Alberts	10.50	1,400.00	14,700.00
S. Maizel	2.50	1,400.00	3,500.00
S. McCandless	9.50	1,295.00	12,302.50
S. Schrag	70.50	1,100.00	77,550.00



Client: Powin, LLC

Invoice Date: December 12, 2025

Matter: 15817500-000002

INVOICE #: 5001-1035913

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
T. Moyron	87.50	1,545.00	135,187.50
T. Moyron	20.60	772.50	15,913.50
V. Durrer	72.90	1,800.00	131,220.00
V. Durrer	17.40	900.00	15,660.00
V. Madrigal	6.50	940.00	6,110.00
Total	737.80		881,863.50

Task Summary:

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B100	Administration	0.50	427.50
B110	Case Administration	4.30	4,088.50
B120	Asset Analysis and Recovery	42.50	53,769.50
B130	Asset Disposition	37.40	49,065.00
B140	Stay Relief/Adeq Prot	0.20	309.00
B150	UCC Issues/Meetings	0.80	1,207.50
B160	Fee/Employment Applications	41.60	41,523.00
B185	Assumption/Rejection of Contracts	0.90	1,239.00
B190	Other contested matters	3.10	3,055.50
B195	Non-Working Travel	63.20	45,418.50
B230	DIP financing/Cash Collateral	0.40	210.00
B240	Tax Issues	0.20	309.00
B250	Real Estate Leases	3.30	4,165.00
B310	Claims Administration and Objections	141.10	167,716.00
B320	Plan and Disclosure Statement (incl. Business Plan)	309.20	403,129.00
CUST	Customer Issues	30.10	33,772.00
EMP	Employee matters	13.90	19,209.50
INS	Insurance	0.60	805.00
REP	Reporting/Schedules	16.30	18,304.00
WARNACT	WARN Act Issues	28.20	34,141.00
Total		737.80	\$881,863.50

Disbursement Detail:

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/02/25	Virtual office with Physical Address for Powin Entity	99.00
11/11/25	WESTLAW SCHRAG SARAH	195.50
11/17/25	Airfare John D. Beck, Incurred fee changing flight to attend Powin hearing.	300.00
11/18/25	WESTLAW SCHRAG SARAH	420.50
11/19/25	WESTLAW SCHRAG SARAH	793.50



Client: Powin, LLC

Invoice Date:

December 12, 2025

Matter: 15817500-000002

INVOICE #:

5001-1035913

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/20/25	Tania M. Moyron, 11/23 Airfare from LA to NY	2,500.00
11/21/25	WESTLAW SCHRAG SARAH	300.00
11/23/25	Lodgement Fees Tania M. Moyron, 11/23 - Room Charge	995.00
11/23/25	Travel Expenses Tania M. Moyron, Uber Charge - Travel to LAX for travel to NY for Confirmation Hearing and Other Hearings on 11/25	87.57
11/24/25	Lodgement Fees Tania M. Moyron, 11/24 Room Charge	995.00
11/25/25	Lodgement Fees Tania M. Moyron, 11/25 Room Charge	995.00
Total Disbursements		\$7,681.07

Fees 881,863.50

Disbursements 7,681.07

Total Due This Invoice \$889,544.57