

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
RHODIUM ENCORE LLC, <i>et al.</i> , ¹	§	Case No. 24-90448 (ARP)
	§	
Debtors.	§	
	§	(Jointly Administered)
	§	

**QUINN EMANUEL URQUHART & SULLIVAN, LLP’S
SIXTH MONTHLY FEE STATEMENT FOR THE PERIOD
FEBRUARY 1, 2025, THROUGH FEBRUARY 28, 2025**

Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”) submits, pursuant to the Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals (the “Interim Compensation Order”) (ECF No. 264) entered on October 14, 2024, this monthly fee statement for the payment of interim compensation rendered and reimbursement of expenses incurred during the period February 1, 2025, through February 28, 2025 (the “Sixth Monthly Fee Statement”).

Quinn Emanuel seeks payment of interim compensation in the total amount of \$709,566.40 (80% of the services rendered), plus \$12,799.95 (100% of the interim expenses incurred). Summaries of the fees and expenses are as Exhibits A, B, and C. An invoice reflecting detailed time entries is attached hereto as Exhibit D.

¹ The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall serve within 14 days after service of the Fourth Monthly Fee Statement a written notice, via email, upon Quinn Emanuel and each of the other Fee Notice Parties (as listed below) (the “Written Notice”). The Written Notice shall specifically identify the objectionable fees and expenses, including the amount at issue and the basis for the objection. If the parties are unable to reach a resolution of the objection within 14 calendar days, the objecting party shall file its objection (the “Objection”) with this Court within 3 business days and serve such Objection on Quinn Emanuel and each of the other Fee Notice Parties. *See* Interim Compensation Order, ¶ 1(a)(c).

The Fee Notice Parties as defined in the Interim Compensation Order are:

- i. Rhodium Enterprises, Inc., Attn: Charles Topping (chucktopping@rhdm.com) and Morgan Soule (morgansoule@rhdm.com), 2617 Bissonnet Street, Suite 234, Houston, Texas 77005;
- ii. Debtors’ Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP, Attn: Patricia B. Tomasco (pattytomasco@quinnemanuel.com); Razmig Izakelian (razmigizakelian@quinnemanuel.com), Alain Jaquet (alainjaquet@quinnemanuel.com), and Joanna D. Caytas (joannacaytas@quinnemanuel.com), 700 Louisiana, Suite 3900, Houston, Texas 77002;
- iii. Debtors’ Financial Advisor, c/o Province, Attn: Mark Robinson (mrobinson@provincefirm.com); David Dunn (ddunn@provincefirm.com); Kirsten Lee (klee@province.com); and Andrew Popescu (apopescu@provincefirm.com), 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074;
- iv. Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP, Ryan C. Wooten (rwooten@orrick.com), 609 Main, 40th Floor, Houston, Texas 77002, and Robert Trust (rtrust@orrick.com), Mark Franke (mfranke@orrick.com) and Brandon Batzel (bbatzel@orrick.com), 51 West 52nd Street, New York, New York 10019;
- v. Counsel for the Committee of Unsecured Creditors, c/o McDermott Will & Emery LLP, 2501 North Harwood St., Suite 1900, Dallas, Texas 75201, Attn: Charles R. Gibbs (cr gibbs@mwe.com); and

- vi. United States Trustee, Ha Minh Nguyen (ha.nguyen@usdoj.gov), 515 Rusk, Suite 3516, Houston, Texas 77002.

If no objection is timely served pursuant to the Interim Compensation Oder, the Debtors shall be authorized and directed to pay Quinn Emanuel an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage of fees and expenses that are not subject to an objection, as stated in the Interim Compensation Order.

Respectfully submitted this 25th day of March, 2025.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Patricia B. Tomasco

Patricia B. Tomasco (SBN 01797600)

Cameron Kelly (SBN 24120936)

Alain Jaquet (*pro hac vice*)

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Houston, Texas 77002

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- and -

Eric Winston (*pro hac vice*)

Razmig Izakelian (*pro hac vice*)

865 S. Figueroa Street, 10th Floor

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Counsel for the Debtors and Debtors in Possession

EXHIBIT A**Summary of Legal Fees for the Fee Period**

Matter Number	Matter Description	Total Hours Billed	Total Fees Requested	Total Fees With 20% Discount
ii	Asset Disposition	0.0	\$0.00	\$0.00
iii	Assumption and Rejection of Leases and Contracts	0.0	\$0.00	\$0.00
ix	Employee Benefits and Pensions	1.5	\$2,917.50	\$2,334.00
v	Business Operations	0.0	\$0.00	\$0.00
vi	Case Administration	97.3	\$155,400.50	\$124,320.40
vii	Claims Administration and Objections	37.4	\$54,924.00	\$43,939.20
viii	Corporate Governance and Board Matters	11.8	\$22,951.00	\$18,360.80
x	Employment and Fee Applications	32.1	\$27,090.50	\$21,672.40
xi	Financing/Cash Collateral	15.9	\$28,878.00	\$23,102.40
xii	Litigation	332.9	\$433,529.50	\$346,823.60
xiii	Non-working Travel ²	16.5	\$13,447.50	\$10,758.00
xiv	Plan and Disclosure Statement	90.6	\$147,236.00	\$117,788.80
xv	Relief from Stay and Adequate Protection	.3	\$583.50	\$466.80
	Total	636.3	\$886,958.00	\$709,566.40

² Non-working travel billed at 100% is 26,895.00. 50% of the total non-working travel is \$13,447.50, as reflected in the chart above.

EXHIBIT B**Summary of Hours billed by Quinn Emanuel Attorneys and Paraprofessionals**

Professional	Position With The Applicant	Year Admitted	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Patricia B. Tomasco	Partner	1988	Bankruptcy & Restructuring	\$1,945.00	162.9	\$316,840.50
Daniel Holzman	Counsel	1999	Bankruptcy & Restructuring	\$1,775.00	.2	\$355.00
Razmig Izakelian	Associate	2013	Bankruptcy & Restructuring	\$1,665.00	33.9	\$56,443.50
Lindsay Weber	Associate		Bankruptcy & Restructuring	\$1,665.00	43.3	\$72,094.50
Ben Roth	Associate	2019	Bankruptcy & Restructuring	\$1,560.00	122.7	\$191,412.00
Alain Jaquet	Associate	2016	Bankruptcy & Restructuring	\$1,560.00	60.8	\$94,848.00
Deshani Ellis	Associate	2020	Commercial Litigation	\$1,560.00		
Sam Donohue	Associate	2019	Litigation	\$1,560.00		
Zach Meeker	Associate	2022	Complex Litigation	\$1,435.00	6.6	\$9,471.00
Eli Pales	Associate	2022	Litigation	\$1,315.00	4.2	\$5,523.00
Rachel Harrington	Associate	2024	Bankruptcy & Restructuring	\$1,165.00	38.6	\$44,969.00
Lance Frankel	Associate	2024	Litigation	\$1,035.00	60.2	\$62,307.00
Scott Anderson	Associate	2024	Litigation	\$1,035.00	3.9	\$4,036.50
Shashank Sirivolu	Associate	2024	Complex Litigation	\$1,035.00		
Barbara J. Howell	Paralegal		Bankruptcy & Restructuring	\$655.00	47.9	\$31,374.50
Michael Acuna	Litigation Support			\$210.00		
Ryan Lopez	Litigation Support			\$210.00	1.1	\$231.00
Linda Yanez	Litigation Support			\$210.00	1.7	\$357.00
Raul Vasquez	Litigation Support			\$210.00	48.3	\$10,143.00
Total					636.3	\$900,405.50

EXHIBIT C**Summary of Expenses for the Fee Period**

Expense	Amount
Postage	\$26.08
Room rental (from October 2024)	
Filing fee	\$350.00
Meals during travel	\$43.78
Deposition transcripts	
Federal Express/Express mail	\$60.86
Courier	
Hotel	\$1,737.21
Out of-town travel	\$233.25
Air Travel	\$638.96
Travel	\$122.09
Document Services	
RelOne User Fee	
RelOne TIFF (per page)	
RelOne Active Hosting (per GB)	\$1,351.64
RelOne Processing	
Black and white document reproduction (\$.10 per page)	\$129.80
Color document reproduction (\$.25 per page)	
Professional services – (fees/expenses incurred by expert – Nenad Miljkovic)	\$8,021.25
Local Meals	\$26.63
Hearing Transcripts	\$58.40
Total	\$12,799.95

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865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017

March 11, 2025

Cameron Blackmon
Rhodium Enterprises, Inc.
4146 W US Highway 79
Rockdale, TX 76567

Matter #: 12875-00001
Invoice Number: 101-0000185500
Responsible Attorney: Patty Tomasco

Rhodium- restructure of company

For Professional Services through February 28, 2025 in connection with a potential restructuring of this crypto mining company.

Fees	\$900,405.50
Travel Adjustment (50%)	<u>-\$13,447.50</u>
Net Billed Fees	\$886,958.00
Expenses	<u>\$12,799.95</u>
Net Amount	\$899,757.95
Total Due This Invoice	\$899,757.95
Balance Due from Previous Statement(s)	\$1,730,076.18
Total Balance Due	<u>\$2,629,834.13</u>

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Los Angeles | Mannheim | Miami | Munich | Neuilly La Défense | New York | Paris | Perth | Riyadh | Salt Lake City
San Francisco | Seattle | Shanghai | Silicon Valley | Singapore | Stuttgart | Sydney | Tokyo | Washington DC | Wilmington | Zurich

EXHIBIT

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Statement Detail**ix Employee Benefits and Pensions**

02/01/25	PT	Continue to review and analyze ordinary course bonuses and employee review issues and multiple emails regarding same with A. Catatao and C. Topping (0.8).	0.80	1,556.00
02/26/25	PT	Discussion re human resources/personnel issues-with Charles Topping (.50); Alicia Catatao regarding ordinary course terminations and severance (.20).	0.70	1,361.50
SUBTOTAL			1.50	2,917.50

vi Case Administration

02/03/25	AJ4	Attend telephone conference with P. Tomasco, M. Robinson, et al. Regarding case status and next steps (0.5).	0.50	780.00
02/03/25	AJ4	Attend telephone conference with P. Tomasco, R. Izakelian, et al. Regarding case status, next steps and strategy (0.5).	0.50	780.00
02/03/25	PT	Prepare for (0.4) and coordination call with Andrew Popescu, Daniel Holzman, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian, D. Dunn regarding status of projects and strategy (0.5).	0.90	1,750.50
02/03/25	PT	Call with the Quinn Emanuel team to review projects and research with Alain Jaquet, Ben Roth, Razmig Izakelian, Rachel Harrington (0.5).	0.50	972.50
02/03/25	RH9	Attend Quinn Emanuel team meeting to discuss strategy (0.5); attend Quinn Emanuel and Province teams telephone conference to discuss strategy (0.5).	1.00	1,165.00

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02/03/25	BR4	Call with Quinn Emanuel regarding case updates (0.5); call (partial) with Quinn Emanuel and Province teams regarding same (0.4).	0.90	1,404.00
02/03/25	PT	Conference call regarding plan projections, miner refresh and power contracts with Ben Roth, Brenda Funk, Michael Robinson, Andrew Popescu, Kristen Lee, Lindsay Weber, Razmig Izakelian, Jason S. Brookner, Amber M. Carson, Scott Kintz (0.5).	0.50	972.50
02/03/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.5); conference with Quinn Emanuel and Province teams regarding case strategy (0.5).	1.00	1,665.00
02/04/25	PT	Prepare for and participate in negotiation call with Sarah Schultz, David Dunn, Michael Robinson (0.5); follow up correspondence with B. Roth regarding responding to miner allocation issues in plan (0.6).	1.10	2,139.50
02/04/25	PT	Operations call to review strategy with Chase Blackmon, Cameron Blackmon, Morgan Soule, Michael Robinson, Kevin Hays, Charles Topping (0.6).	0.60	1,167.00
02/04/25	PT	Coordination call with Andrew Popescu, Quinn Emanuel Debtor Team, Daniel Holzman, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian to discuss ongoing projects and strategy (0.9).	0.90	1,750.50
02/04/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.9); emails regarding same (0.1); review and revise claim objections (1.2).	2.20	3,432.00
02/05/25	AJ4	Attend telephone conference with P. Tomasco, A. Popescu, et al.	0.50	780.00

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		Regarding case status and next steps (0.5).		
02/05/25	PT	Coordination call with Andrew Popescu, Rachel Harrington, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian to review strategy and planning (0.5); emails with H. Nguyen regarding bond fees on United States Trustee accounts (0.3) and follow up with A. Popescu (0.3).	1.10	2,139.50
02/05/25	RH9	Conference with Quinn Emanuel and Province teams to discuss strategy (0.5).	0.50	582.50
02/05/25	BH2	Review Pacer docket and update files for attorneys' review (0.7).	0.70	458.50
02/05/25	BR4	Research relating to investor question (2.1); draft response to same (0..8); call with Quinn Emanuel and Province team regarding case updates (0.5).	3.40	5,304.00
02/05/25	RI	Conference with Quinn Emanuel team and Province team regarding case strategy and assignments (0.5).	0.50	832.50
02/06/25	PT	Prepare for (.1) and update call with Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian (.50).	0.60	1,167.00
02/06/25	AJ4	Attend telephone conference with P. Tomasco, M. Robinson, et al. Regarding case status and next steps (0.5).	0.50	780.00
02/06/25	PT	Review case strategy and operations with Chase Blackmon, Cameron Blackmon, Morgan Soule, Michael Robinson, Kevin Hays, Charles Topping (.50); coordinate response to B. Funk regarding miner integration (.40); follow up with B. Roth regarding response to miner integration inquiry (.50).	1.40	2,723.00

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02/06/25	BR4	Call (partial) with the Quinn Emanuel team regarding case updates (0.3).	0.30	468.00
02/07/25	PT	Coordination call with Andrew Popescu, Rachel Harrington, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian (.50).	0.50	972.50
02/07/25	AJ4	Attend telephone conference with P. Tomasco, M. Robinson, et al. Regarding case status and next steps (0.5).	0.50	780.00
02/07/25	LF5	Review document batches for privilege and identify where redactions are necessary (5.1).	5.10	5,278.50
02/07/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.5); call with Quinn Emanuel and Province teams and investors counsel regarding miner installation (0.5); call with P. Tomasco regarding same (0.2); research and draft response in relation to same (3.7); draft responses to inquiries on case updates (0.6); emails regarding same (0.1).	5.60	8,736.00
02/07/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (0.5).	0.50	832.50
02/08/25	BR4	Emails regarding projections and review documents on same (0.2).	0.20	312.00
02/09/25	BR4	Emails regarding requests from creditors counsel (0.3).	0.30	468.00
02/10/25	AJ4	Attend telephone conference with P. Tomasco, A. Popescu, et al. Regarding case status, next steps and strategy (0.5).	0.50	780.00
02/10/25	PT	Coordination and planning call with Alain Jaquet, Ben Roth, Lindsay Weber, Razmig Izakelian (.40); strategy call Andrew Popescu, Daniel	0.90	1,750.50

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		Holzman, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian, Rachel Harrington (.50).		
02/10/25	RH9	Attend team meeting (.4); conference with Province and Quinn Emanuel teams to discuss strategy (.5).	0.90	1,048.50
02/10/25	AJ4	Prepare for (.1) and attend telephone conference with P. Tomasco, R. Izakelian, et al. Regarding case status and next steps (0.4).	0.50	780.00
02/10/25	BR4	Call with Quinn Emanuel team regarding case updates (0.4); call with Quinn Emanuel and Province teams regarding same (0.5); call with investors counsel Quinn Emanuel and Province regarding outstanding questions (0.8); research regarding same (0.2); emails regarding case status with various parties (0.7).	2.60	4,056.00
02/10/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.4); conference with Quinn Emanuel and Province teams regarding case strategy (0.5).	0.90	1,498.50
02/11/25	AJ4	Attend telephone conference with P. Tomasco, R. Izakelian, et al. Regarding case status and next steps (0.5).	0.50	780.00
02/11/25	PT	Meeting with Michael Robinson, Stephen Lemmon, Chase Blackmon, Rhonda Mates, Cameron Blackmon, Nathan Nichols, Charles Topping, K. Lee regarding case status and discovery issues(1.5); follow up meeting with M. Robinson regarding path forward (.30).	1.80	3,501.00
02/11/25	PT	Prepare for (.4) and participate in strategy and coordination call with Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian, R. Harrington (.5).	0.90	1,750.50

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02/11/25	PT	Operations call with Cameron Blackmon, Morgan Soule, Michael Robinson, Kevin Hays, Charles Topping regarding wallet reallocation and miner integration issues (1.7).	1.70	3,306.50
02/11/25	BH2	Email exchange with V. O'Connell (Stris & Maher) regarding a docket entry listed on the Pacer docket (.1); email exchange with T. Laws (Bankruptcy Court) regarding a misfiled order on the Rhodium document (.2).	0.30	196.50
02/11/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (.5); research related to a request from the transcend Group (2.3); emails regarding same (0.3); call with R. Izakelian regarding same (0.3).	3.40	5,304.00
02/11/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (0.5).	0.50	832.50
02/12/25	AJ4	Attend (partial) telephone conference with P. Tomasco, R. Izakelian, et al. Regarding case status and next steps (0.4).	0.40	624.00
02/12/25	PT	Strategy call with Andrew Popescu, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian, Rachel Harrington (.6).	0.60	1,167.00
02/12/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.6).	0.60	936.00
02/12/25	RI	Prepare for (.2) and telephone conference with Quinn Emanuel and Province teams regarding case strategy and assignments (0.6).	0.80	1,332.00
02/13/25	AJ4	Prepare for (0.3) and attend telephone conference with P. Tomasco, R. Izakelian, et al. Regarding case status	0.70	1,092.00

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		and next steps (0.4).		
02/13/25	PT	Coordinate with M. Robinson to communicate with M. Fox regarding case status(.10).	0.10	194.50
02/13/25	PT	Conference call with the Province team regarding miner allocation and ability to equalize revenues among entities (.7); follow-up call with A. Carson, B. Roth regarding secured creditor group regarding miner allocation issue (.7); follow up with A. Peloubet regarding the economics of wallet allocation and miner movement (.6); update B. Roth regarding terms of note amendment and prevailing interest rate (.6).	2.60	5,057.00
02/13/25	PT	Operational strategy meeting with Chase Blackmon, Cameron Blackmon, Morgan Soule, Michael Robinson, Kevin Hays, Charles Topping, Will Thompson, Bridget Asay, John Cohn (.9).	0.90	1,750.50
02/13/25	PT	Planning call with Andrew Popescu, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian, Rachel Harrington(.7).	0.70	1,361.50
02/13/25	BR4	Call with Quinn Emanuel team regarding case updates (0.7); call with A. Popescu regarding miners (0.4); call with Quinn Emanuel and Province regarding same (0.9); call with Quinn Emanuel, Province and investors' counsel regarding same (0.5); review and revise amendment to order and emails regarding same (1.4); research regarding same (1.8).	5.70	8,892.00
02/13/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy (0.9).	0.90	1,498.50
02/13/25	RI	Conference with Quinn Emanuel team regarding case strategy and	0.70	1,165.50

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		assignments (0.7).		
02/14/25	AJ4	Attend telephone conference with P. Tomasco, R. Izakelian, et al. Regarding case status and next steps (0.7).	0.70	1,092.00
02/14/25	PT	Coordination call with Andrew Popescu, Rachel Harrington, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian(.70).	0.70	1,361.50
02/14/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.7).	0.70	1,092.00
02/17/25	AJ4	Attend telephone conference with P. Tomasco, A. Popescu, et al. Regarding case status, next steps and strategy (0.5).	0.50	780.00
02/17/25	AJ4	Attend telephone conference with P. Tomasco, R. Izakelian, et al. Regarding case status and next steps (0.5).	0.50	780.00
02/17/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.5); conference with Quinn Emanuel and Province teams regarding case strategy (0.5).	1.00	1,665.00
02/17/25	PT	Quinn Emanuel weekly team call Alan Jaquet, Ben Roth, Razmig Izakelian, Lindsey Weber, Rachel Harrington to review status of projects and plan drafts (.5); coordination call with Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian, Rachel Harrington (.5); multiple coordination emails regarding workstreams (.7).	1.70	3,306.50
02/18/25	AJ4	Attend telephone conference with P. Tomasco, R. Izakelian, et al. Regarding case status and next steps (0.5).	0.50	780.00

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02/18/25	RH9	Conference with Quinn Emanuel and Province teams regarding strategy. (.5).	0.50	582.50
02/18/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.5).	0.50	832.50
02/18/25	BH2	Review Rhodium dockets (main case and adversary) for any new pleadings filed, hearing dates, or deadlines (.7).	0.70	458.50
02/18/25	PT	Operational strategy call with Chase Blackmon, Cameron Blackmon, Morgan Soule, Michael Robinson, Kevin Hays, Charles Topping, Will Thompson, Bridget Asay, John Cohn (1.1).	1.10	2,139.50
02/18/25	PT	Update and strategy call with Andrew Popescu, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian, Rachel Harrington (.5).	0.50	972.50
02/18/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.5); emails regarding same (0.2).	0.70	1,092.00
02/20/25	BH2	Review Rhodium Pacer docket (.2) and update files to current status, calendaring any deadlines and hearing dates (.3).	0.50	327.50
02/21/25	AJ4	Attend telephone conference with P. Tomasco, R. Izakelian, et al. Regarding case status and next steps (0.5).	0.50	780.00
02/21/25	RH9	Conference with Quinn Emanuel and Province teams regarding case strategy (.5).	0.50	582.50
02/21/25	PT	Project coordination call with Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian, Rachel Harrington (.5).	0.50	972.50

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02/21/25	BH2	Complete Transcript Order Form for February 21, 2025, hearing (.2) and file same (.3).	0.50	327.50
02/21/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.5); emails regarding same (0.4); call with R. Izakelian regarding same (0.2).	1.10	1,716.00
02/23/25	PT	Review correspondence with B. Funk regarding warrants (.30); correspond with B. Rice regarding warrants (.20).	0.50	972.50
02/24/25	AJ4	Attend telephone conference with P. Tomasco, R. Izakelian, et al. Regarding case status and next steps (0.5).	0.50	780.00
02/24/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.6); conference with Quinn Emanuel and Province teams regarding case strategy (0.5).	1.10	1,831.50
02/24/25	RH9	Conference with Quinn Emanuel and Province teams regarding strategy (.5).	0.50	582.50
02/24/25	PT	Review and circulate warrants for discussion on effects (.8); correspond with M. Soule regarding same and concurrent instruments (.6); call to discuss cap table and analysis of warrants and other equity instruments effects with Michael Robinson; David Eaton; Spencer Wells; David Dunn (.4); correspond with D. Holzman regarding same (.2); draft response to B. Funk regarding uneconomic position of warrants based on language (.6).	2.60	5,057.00
02/24/25	PT	Internal coordination weekly call with Alan Jaquet, Ben Roth, Razmig Izakelian, Rachel Harrington (.6); coordination call with Andrew Popescu, M. Robinson, Kristen Lee,	1.10	2,139.50

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		Alan Jaquet, Ben Roth, Razmig Izakelian, R. Harrington (.50).		
02/24/25	BH2	File the 19 Monthly Operating Reports (1.1); download (.5) and forward the file-stamped copies to the Client (.2).	1.80	1,179.00
02/24/25	BR4	Call with Quinn Emanuel team regarding case updates (0.6); call with Quinn Emanuel and Province teams regarding case updates (0.5).	1.10	1,716.00
02/24/25	DH3	Exchange emails with P. Tomasco regarding Warrant Agreement (.2).	0.20	355.00
02/25/25	AJ4	Attend telephone conference with P. Tomasco, A. Popescu, et al. Regarding case status and next steps (0.6).	0.60	936.00
02/25/25	PT	Coordination call with Andrew Popescu, Daniel Holzman, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian, Rachel Harrington (.60).	0.60	1,167.00
02/25/25	PT	Operations strategy call with Chase Blackmon, Cameron Blackmon, Morgan Soule, Michael Robinson, Kevin Hays, Charles Topping, Will Thompson, Bridget Asay, John Cohn (.50).	0.50	972.50
02/25/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.6).	0.60	936.00
02/26/25	AJ4	Attend telephone conference with P. Tomasco, A. Popescu, et al. Regarding case status and next steps (0.5).	0.50	780.00
02/26/25	RI	Conference with Quinn Emanuel team regarding case strategy and assignments (0.5).	0.50	832.50
02/26/25	PT	Coordination and strategy call with Andrew Popescu, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth,	0.50	972.50

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		Razmig Izakelian, Rachel Harrington (.50).		
02/26/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.5).	0.50	780.00
02/27/25	RI	Conference with the Quinn Emanuel and Province teams regarding case strategy and assignments (0.6).	0.60	999.00
02/27/25	AJ4	Attend telephone conference with P. Tomasco, A. Popescu, et al. Regarding case status and next steps (0.6).	0.60	936.00
02/27/25	PT	Coordination and strategy call with Andrew Popescu, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian, Rachel Harrington (.6).	0.60	1,167.00
02/27/25	BH2	Review Pacer docket for the main case and the appeal (.4) and calendar hearing dates and deadlines (.4); obtain the transcript of the February 21st status conference and forward to attorneys and the Client (.3).	1.10	720.50
02/27/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.6).	0.60	936.00
02/28/25	AJ4	Attend telephone conference with P. Tomasco, A. Popescu, et al. Regarding case status and next steps (0.5).	0.50	780.00
02/28/25	PT	Call to discuss economic options with Brenda Funk; Michael Robinson; John Stokes; Ben Roth (.30); correspond with the Chief Restructuring Officer and independent directors regarding the analysis (.30); correspond with C. Topping regarding history of warrants (.30); conference with J. Stokes regarding warrants and calculation of same (.20).	1.10	2,139.50

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02/28/25	PT	Coordination and strategy call with Andrew Popescu, Michael Robinson, Kristen Lee, Alan Jaquet, Ben Roth, Razmig Izakelian(.50).	0.50	972.50
02/28/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.5); call with investors counsel, J. Stokes and P. Tomasco regarding same (0.7).	1.20	1,872.00
SUBTOTAL			97.30	155,400.50

vii Claims Administration and Objections

02/01/25	BR4	Research related to claim objections (2.1); begin drafting same (0.6).	2.70	4,212.00
02/02/25	AJ4	Correspond with B. Roth regarding omnibus claim objections (0.2); review and analyze local rules regarding the same (0.1).	0.30	468.00
02/02/25	BR4	Draft omnibus objection to claims (2.6); research related to same (1.3).	3.90	6,084.00
02/03/25	AJ4	Review and revise claim objections relating to the Proof entities and Whistone (0.3); research local rules in connection with the same (0.2); correspond with R. Izakelian and B. Roth regarding same (0.1).	0.60	936.00
02/03/25	BR4	Review and revise claim objection (2.1); research related to claim objection (0.7).	2.80	4,368.00
02/05/25	RH9	Draft Midas claim objection (3.4).	3.40	3,961.00
02/05/25	BR4	Emails regarding claim objections (0.2).	0.20	312.00
02/06/25	AJ4	Correspond with B. Roth regarding withdrawal of tax claims (0.1).	0.10	156.00
02/06/25	AJ4	Prepare claim withdrawal to Proof entities (0.8); correspond with P. Tomasco in connection with the same (0.1); correspond with Proof entities'	1.00	1,560.00

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		representatives in connection with the same (0.1).		
02/06/25	AJ4	Review and revise the draft objection to Whinstone's claims (0.4).	0.40	624.00
02/06/25	PT	Coordinate identification of claims objections as the precursor to plan (0.2); email team regarding drafting assignments (0.2); coordinate withdrawal of Proof Capital claims based on equitization agreement (0.2).	0.60	1,167.00
02/06/25	RH9	Revisions to the Midas clam objection (.9); draft duplicate claims objection and order (2.8).	3.70	4,310.50
02/06/25	LMW	Emails with Quinn Emanuel team re: claim objections (.4).	0.40	666.00
02/06/25	BH2	Revise claim objections (amended and fully satisfied and taxing authorities) (1.1).	1.10	720.50
02/10/25	AJ4	Correspond with C. Foggin regarding Proof entities' claim withdrawals (0.1).	0.10	156.00
02/12/25	AJ4	Correspond with C. Foggin regarding Proof entities' claim withdrawals (0.4); correspond with A. Popescu in connection with the same (0.2).	0.60	936.00
02/13/25	AJ4	Correspond with C. Foggin regarding Proof entities' claim withdrawals (0.1).	0.10	156.00
02/17/25	AJ4	Correspond with C. Foggin regarding the withdrawal of claims by Proof entities (0.2).	0.20	312.00
02/17/25	AJ4	Review and revise draft claim objection to Whinstone's claims, including by incorporating edits provided Stris and the Quinn Emanuel team (1.3).	1.30	2,028.00
02/17/25	AJ4	Correspond with C. Foggin regarding the withdrawal of claims by Proof	0.20	312.00

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		entities (0.2).		
02/17/25	RI	Review and analyze the claims register and proofs of claim (2.8).	2.80	4,662.00
02/17/25	PT	Review and extensive revisions to Whinstone proofs of claim along with additional research (1.8); coordinate the circulation of drafts for comments (.3).	2.10	4,084.50
02/17/25	BR4	Review and revise the claim objection (2.2); emails regarding same (0.4).	2.60	4,056.00
02/18/25	AJ4	Finalize claim objection to Whinstone's claims (0.8).	0.80	1,248.00
02/18/25	BH2	Finalize (.6) and file Rhodium's Objection to Whinstone's claim (.3); forward the file-stamped copy to attorneys and the Client (.2).	1.10	720.50
02/19/25	AJ4	Review claim withdrawal forms (0.3); correspond with C. Foggin in connection with the same (0.1); correspond with A. Popescu regarding the same (0.1); correspond with P. Tomasco in connection with the same (0.1).	0.60	936.00
02/25/25	AJ4	Prepare chart for tracking claim objections (1.8); review related materials (.4); correspond with R. Izakelian and R. Harrington regarding the same (0.2).	2.40	3,744.00
02/27/25	AJ4	Review and revise the chart regarding the claim objection's tracker (0.6); correspond with F. Sebzavari regarding the same (0.2); research omnibus claim objections (0.3); correspond with R. Izakelian and R. Harrington in connection with the same (0.2).	1.30	2,028.00
SUBTOTAL			37.40	54,924.00

viii Corporate Governance and board Matters

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02/03/25	PT	Coordinate with B. Rice regarding plan concept slides for board meeting (0.5); review and comment on revisions of S. Schultz (0.7).	1.20	2,334.00
02/05/25	PT	Prepare for and present at Board Meeting with Becky Rice, Chase Blackmon, Cameron Blackmon, Nathan Nichols, Jonas Norr, Renata Szkoda, David Eaton, Spencer Wells, Charles Topping, Morgan Soule, Kevin Hays, Michael Robinson, David Dunn (2.2).	2.20	4,279.00
02/10/25	PT	Conference with T. Schmeltz, D. Eaton, C. Topping regarding board meeting planning (.7).	0.70	1,361.50
02/11/25	PT	Discuss Conflict Claim with Trace Schmeltz, David Eaton, Spencer Wells, M. Robinson, Renata Szkoda, Jonas Norr (1.0); debrief with D. Eaton, M. Robinson and S. Wells (.30).	1.30	2,528.50
02/12/25	PT	Board Meeting with Chase Blackmon, Cameron Blackmon, Nathan Nichols, Jonas Norr, Renata Szkoda, David Eaton, Spencer Wells, Charles Topping, Morgan Soule, Kevin Hays, Michael Robinson, David Dunn (1.6).	1.60	3,112.00
02/16/25	PT	Board Meeting Chase Blackmon, Cameron Blackmon, Nathan Nichols, Jonas Norr, Renata Szkoda, David Eaton, Spencer Wells, Charles Topping, Morgan Soule, Kevin Hays, Michael Robinson, David Dunn (1.1); follow up Board Meeting with Chase Blackmon, Cameron Blackmon, Nathan Nichols, Jonas Norr, Renata Szkoda, David Eaton, Spencer Wells, Charles Topping, Morgan Soule, Kevin Hays, Michael Robinson, David Dunn (1.1); research and forward articles regarding board fiduciary duties (1.0).	3.20	6,224.00

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02/26/25	PT	Board update call with Chase Blackmon, Cameron Blackmon, Nathan Nichols, Jonas Norr, Renata Szkoda, David Eaton, Spencer Wells, Charles Topping, Morgan Soule, Kevin Hays, Michael Robinson, David Dunn (9); review the special committee draft report (.7).	1.60	3,112.00
SUBTOTAL			11.80	22,951.00

x Employment and Fee Applications

02/03/25	BH2	Review and revise the Notice of Payments to Ordinary Course Professionals (0.3).	0.30	196.50
02/04/25	BH2	Revise the BDO First Interim Fee Application (0.6) and file same (0.3); forward a file-stamped copy to the Client (0.2).	1.10	720.50
02/05/25	PT	Coordinate retention of expert with C. Blackmon (0.3).	0.30	583.50
02/06/25	BH2	Finalize (0.1) and file the Certificate of No Objection on B. Riley Securities Fee Application (0.3); begin to prepare the January 2025 monthly fee statement to be filed on behalf of Quinn Emanuel (4.1); finalize (0.2) and file the First Quarterly Statement (ordinary course professionals) (0.3).	5.00	3,275.00
02/06/25	PT	Review and comment on notice of ordinary course professionals (.10).	0.10	194.50
02/07/25	PT	Review fee application and comments on same (.40).	0.40	778.00
02/07/25	BH2	Continue to prepare the January Monthly Fee Statement (5.1); review docket (.1) and draft Certificates of No Objection to the First Interim Fee Applications filed by Barnes & Thornburg and Province (.4) and file the same (.3); distribute the order granting the First Interim Fee	6.00	3,930.00

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		Application filed by B. Riley (.1).		
02/10/25	BH2	Continue to prepare the January monthly fee statement on behalf of Quinn Emanuel (3.9); email communications with J. Richards (Lehotsky Keller Cohn) re fee applications (.2) finalize (.3) and file the First Interim Fee Application of Lehotsky Keller Cohn (.3); email communications with V. O'Connell (Stris & Maher) regarding monthly fee statements and payments of same (.3).	5.00	3,275.00
02/11/25	BH2	Finalize (.2) and file the Fourth Monthly Fee Statement on behalf of Quinn Emanuel (.3); finalize (.4) and file the First Interim Fee Application on behalf of Quinn Emanuel (.3); serve both documents to parties pursuant to the Interim Compensation Order (.2).	1.40	917.00
02/11/25	PT	Review and revise the first interim fee application (.4) and the monthly fee request (.2); correspond with B. Howell regarding same (.50).	1.10	2,139.50
02/11/25	BH2	Email exchange with A. Popescu (Province) regarding estimated fees for January and the first week of February (as requested by the Creditors' Committee) (.3).	0.30	196.50
02/14/25	BR4	Prepare engagement letter for expert (1.0).	1.00	1,560.00
02/14/25	BH2	File Stris & Maher's First Interim Fee Application (.3) and forward file-stamped copies to attorneys and the Client (.1).	0.40	262.00
02/14/25	PT	Correspond with expert witness regarding retention letter (.4); correspond with C. Blackmon regarding expert retention letter (.4).	0.80	1,556.00
02/21/25	BH2	File the Fifth Monthly Fee Statement	0.40	262.00

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		on behalf of Lehotsky Keller Cohn (.3) and forward a file-stamped copy to J. Richards for service (.1).		
02/24/25	BH2	Email communication with P. Tomasco regarding a Notice of Rate Increase (.2); draft same (.4) and file with the Court (.3).	0.90	589.50
02/24/25	PT	Review and comment on notice of rate increase to account for Texas local rates (.20).	0.20	389.00
02/24/25	BH2	File the January monthly fee statement on behalf of Stris & Maher (.3); continue to prepare Quinn Emanuel's Fifth Monthly Fee Statement (.7).	1.00	655.00
02/25/25	BH2	Finalize (.1) and file Stris & Maher's Fifth Monthly Fee Statement (.3); forward the LEDES data and a file-stamped copy of the Monthly Fee Statement to the Notice Parties listed in the Interim Compensation Order (.2).	0.60	393.00
02/25/25	BH2	Continue to prepare the January monthly fee statement (3.1).	3.10	2,030.50
02/26/25	BH2	Finalize (.2) and file the Fifth Monthly Fee Statement of Province (.3); finalize (.2) and file the Fifth Monthly Fee Statement of Barnes & Thornburg (.3); serve the file-stamped copies on the Notice Parties listed in the Interim Compensation Order (.2); file the Certificate of No Objection re ECF No. 749 (BDO's fee application) (.3); forward Quinn Emanuel's December invoice for payment (.1).	1.60	1,048.00
02/28/25	PT	Conference with C. Topping regarding Lehotsky Keller Cohn retention application amendments and related issues (.80); follow up emails with research regarding same (.30).	1.10	2,139.50

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SUBTOTAL	32.10	27,090.50
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xi Financing and Cash Collateral

02/06/25	PT	Participate in due diligence call with the Province team and potential exit financier (.90).	0.90	1,750.50
02/07/25	PT	Follow up conference call regarding miner integration and effect with Ben Roth, Brenda Funk, Andrew Popescu, Razing Izakelian (.50); review and comment on Fairbairn's request for adequate protection (.50); participate in conference call regarding same with B. Roth (.40); review and comment on draft response email to B. Funk (.40).	1.80	3,501.00
02/09/25	PT	Review and comment on Fairbairn information request (.30); coordinate information with J. Brookner (.30); review and suggest response to request for adequate protection and related information (.30).	0.90	1,750.50
02/10/25	PT	Follow-up on Miner Allocation call - Brenda Funk, Ben Roth, Michael Robinson, Razmig Izakelian, Andrew Popescu, Kristen Lee, Amber Carson, Jason Brookner (1.0); review and revise adequate protection stipulation and circulate to J. Brookner (.7).	1.70	3,306.50
02/10/25	RI	Prepare stipulation regarding the use of cash collateral (0.9); conference with Quinn Emanuel and Province teams, and 2.0 and Encore secured creditors groups regarding use of cash collateral (0.5).	1.40	2,331.00
02/11/25	PT	Correspond with B. Roth regarding adequate protection parameters for prepetition secured lenders in light of contract terms (.3); analysis of adequate protection claims and possible solutions (.3).	0.60	1,167.00

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02/12/25	BR4	Review and revise the amendment to the cash collateral order (1.4); emails regarding same (0.4).	1.80	2,808.00
02/12/25	PT	Correspond with B. Funk regarding relative merits of adequate protection request and potential solutions (.6); edit the response to B. Funk from B. Roth (.3).	0.90	1,750.50
02/14/25	BR4	Review and revise the amendment to the cash collateral order (0.7); emails regarding same (0.4).	1.10	1,716.00
02/18/25	PT	Participate in exit financing due diligence call (1.1).	1.10	2,139.50
02/20/25	PT	Review and comment on cash collateral order amendment (.1) and coordinate circulation to lenders (.1).	0.20	389.00
02/24/25	BR4	Emails regarding cash collateral order amendment (0.3); call with G. Steinman regarding same (0.2).	0.50	780.00
02/24/25	PT	Write the narrative for discussions with the Creditors' Committee regarding adequate protection stipulation (.60).	0.60	1,167.00
02/25/25	BR4	Emails regarding cash collateral order (0.9).	0.90	1,404.00
02/25/25	PT	Follow-up response to the Unsecured Creditors' Committee's push back on adequate protection stipulation (.30); coordinate response to same (.30).	0.60	1,167.00
02/28/25	PT	Due diligence call with litigation financier (.50); follow-up emails with the LW team regarding due diligence documents (.40).	0.90	1,750.50
SUBTOTAL			15.90	28,878.00

xii Litigation

02/01/25	LF5	Review document batches for attorney-client privilege and identify	3.10	3,208.50
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		where redactions are necessary (3.1).		
02/02/25	PT	Prepare for and participate in conference call regarding discovery pause (0.5); detailed response to S. Schultz proposal to negotiating team (0.5); review with R. Izakelian status of discovery responses (0.6).	1.60	3,112.00
02/02/25	EP1	Conduct privilege review of 581 documents for production (4.2).	4.20	5,523.00
02/02/25	RI	Review and analyze documents produced to the Committee and SAFE AHG (3.8).	3.80	6,327.00
02/02/25	LF5	Review document batches for attorney-client privilege and identify where redactions are necessary (2.4).	2.40	2,484.00
02/03/25	PT	Correspond with management team regarding mediation scheduling (0.9); coordinate with C. Topping regarding time to exit (0.9); follow up on discovery pause for the SAFE committee (1.0); telephone conference with M. Robinson regarding meeting with D. Proman (1.0).	3.80	7,391.00
02/03/25	RH9	Review revised adversary complaint (0.9).	0.90	1,048.50
02/03/25	LMW	Review productions re: privilege (1.3); emails to R. Izakelian re: document counts (1.2).	2.50	4,162.50
02/03/25	LF5	Review batches of documents for attorney-client privilege and identify where redactions are necessary (1.1).	1.10	1,138.50
02/03/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	4.90	1,029.00
02/03/25	BR4	Call with investors counsel and Province regarding projections (1.5); review and revise complaint (2.7).	4.20	6,552.00
02/04/25	PT	Prepare for and participate in litigation checkpoint call to discuss	1.30	2,528.50

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		litigation status and coordination (0.5); coordinate with M. Moore regarding mediation logistics (0.1); coordinate expert testimony with B. Asay (0.1); coordinate comments to amended complaint against Whinstone regarding various causes of action and choice of law therefor (0.1); review and edit Debtors' reply (0.1); coordinate finalization and filing of same (0.1); correspond with B. Roth regarding issues with complaint and suggestions for improving (0.1); review and coordinate additional comments to form of complaint (0.1); review and comment on the Creditors' Committee's 2004 requests (0.1).		
02/04/25	LMW	Review and revise search terms re: document collection (.8); emails to Quinn Emanuel team re: same (0.4).	1.20	1,998.00
02/04/25	BH2	Email communications with M. Viramontes (Stris) regarding exhibits for phase 2 of the Whinstone litigation (0.6).	0.60	393.00
02/04/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	4.70	987.00
02/05/25	AJ4	Prepare draft mediation order (1.0); correspond with P. Tomasco in connection with the same (0.1).	1.10	1,716.00
02/05/25	PT	Coordinate mediation logistics with S. Schultz (0.2); circulate draft mediation order (0.2); revisions to mediation order (0.4).	0.80	1,556.00
02/05/25	PT	Review the status of the discovery and document production (1.0); correspondence with C. Gibbs regarding postponement of discovery responses (0.3).	1.30	2,528.50
02/05/25	RH9	Legal research into mandatory	1.20	1,398.00

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		abstention and core proceedings (1.2).		
02/05/25	BH2	Email communications with M. Viramontes (Stris & Maher) regarding the Phase 2 exhibits (0.3).	0.30	196.50
02/05/25	LF5	Review document batches for attorney-client privilege and identify where redactions are necessary (0.6).	0.60	621.00
02/05/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	4.90	1,029.00
02/06/25	RH9	Legal research to support review of district court order in Midas litigation (2.4).	2.50	2,912.50
02/06/25	LF5	Review document batches for privilege and identify where redactions are necessary (4.6).	4.60	4,761.00
02/06/25	LMW	Emails with R. Izakelian re: document productions (.4); emails with litigation support re: same (.3).	0.70	1,165.50
02/06/25	SA4	Review documents for privilege (0.8).	0.80	828.00
02/06/25	PT	Coordinate call with founders' counsel (.30); coordinate response to discovery inquiry from SAFE committee (.20).	0.50	972.50
02/06/25	RI	Review and analyze documents for production (2.4).	2.40	3,996.00
02/06/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	2.60	546.00
02/07/25	PT	Prepare for and participate in conference call to review and comment on draft complaint with Andrew Popescu, Spencer Wells, John Stokes, Jon Cohn, Trace Schmeltz, David Dunn, Bridget Asay, Peter Brody, Will Thompson, Michael Robinson (1.0); conference with D. Eaton regarding revised complaint (1.0); conference with M. Robinson	4.70	9,141.50

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		regarding timing of litigation (1.0); telephone conference regarding revised Complaint with Chase Blackmon, Jon Cohn, Becky Rice, John Stokes, Bridget Asay, Elizabeth Brannen, Will Thompson, Todd Disher, Alexis Swartz, David Eaton, Charles Topping (.50); coordinate with D. Eaton and S. Wells regarding draft complaint (.50); review and revise the draft complaint (.30); coordinate with mediation parties regarding mediation order (.40).		
02/07/25	LMW	Call with R. Izakelian re: discovery (.5); review of documents for privilege for same (1.3).	1.80	2,997.00
02/07/25	RH9	Conference with Quinn Emanuel and Province teams to discuss strategy (.5). Review document batches for privilege and identify where redactions are necessary (5.1).	0.50	582.50
02/07/25	AJ4	Review Whinstone's comments to mediation order (0.4); correspond with P. Tomasco in connection with the same (0.1).	0.40	624.00
02/07/25	RH9	Legal research on mandatory abstention (1.3).	1.30	1,514.50
02/07/25	BH2	Review docket (.1) and calendar hearing on Phase 2 of the litigation (.1).	0.20	131.00
02/07/25	SA4	Review documents for privilege (1.4).	1.40	1,449.00
02/07/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	1.70	357.00
02/08/25	LF5	Review document batches for privilege and identify where redactions are necessary (1.6).	1.60	1,656.00
02/09/25	LF5	Review document batches for privilege and identify where redactions are necessary (2.1).	2.10	2,173.50

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02/10/25	PT	Conference with D. Eaton, S. Wells, D. Dunn, M. Robertson regarding the draft complaint (.5); emails with J. Stokes regarding the complaint and causes of action (.2); review and suggest comments to the legal summary of jurisdiction questions (.3) and follow up with R. Harrington regarding same (.3); review and analyze the second phase I ruling (.3); communications with the litigation team regarding same (.5); coordinate finalization and filing of mediation order (.2); emails with litigation team regarding effect of second phase 1 ruling (.3).	2.60	5,057.00
02/10/25	PT	Coordinate with D. Eaton, T. Schmeltz regarding strategy (.5); correspond with C. Topping regarding Unsecured Creditors' Committee's discovery requests and standstill agreement (.5); telephone conferences with M. Robinson regarding update and strategy(.5).	1.50	2,917.50
02/10/25	AJ4	Review Second Interim Order on Phase 1 of Motion to Assume Executory Contracts (0.3).	0.30	468.00
02/10/25	BH2	Review January 24th hearing transcript for references to mediation (.2); finalize (.3) and file the proposed Agreed Mediation Order Appointing Judge Mark Mullin as Mediator (.3); review Order entered re phase 1 of the litigation (.2) and email communications with M. Viramontes (Stris & Maher) regarding phase 2 of the litigation (.2).	1.20	786.00
02/10/25	LF5	Review document batches for privilege and identify where redactions are necessary (7.5).	7.50	7,762.50
02/10/25	BR4	Review research on the Whinstone issues and pleadings and court order	2.40	3,744.00

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		(2.4).		
02/10/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	4.10	861.00
02/11/25	LF5	Review document batches for privilege and identify where redactions are necessary (7.9).	7.90	8,176.50
02/11/25	BR4	Review updated complaint for filing (0.2).	0.20	312.00
02/11/25	PT	Weekly litigation coordination call with Chase Blackmon, Cameron Blackmon, Morgan Soule, Michael Robinson, Kevin Hays, Charles Topping, Will Thompson, Bridget Asay, John Cohn (.5); correspond with B. Asay regarding meet and confer with Foley (.2); correspond with potential expert witness and coordinate time to meet (.3); correspond with chambers regarding setting on phase 2 and mediation pending (.3); review and analyze 2004 letter agreement from the Unsecured Creditors' Committee (.7); review and analysis of damages complaint (.8); correspond with D. Eaton and S. Wells regarding same (.2); coordinate with S. Schultz regarding mediation (.2); coordinate finalization and filing of damages complaint (.2).	3.40	6,613.00
02/11/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	2.80	588.00
02/11/25	BH2	Assist attorneys with the preparation of the Complaint (3.3); draft a summons for each defendant (.4); file the Complaint and the Summonses (.4); distribute file-stamped copies to the attorneys (.1).	4.20	2,751.00
02/11/25	BH2	Review Agreed Mediation Order Appointing Judge Mark Mullin as	0.80	524.00

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		Mediator (.1) and forward to attorneys (.1); telephone conference with P. Brody (Stris & Maher) regarding the upcoming hearing on Phase 2 (.3); email exchange with M. Viramontes (Stris & Maher) regarding the deadline to file the exhibits for the Phase 2 litigation (.3).		
02/12/25	PT	Call with potential expert witness (.5); correspond with J. Tecce regarding causes of action (.3); correspond with M. Robinson regarding triggering event for the Unsecured Creditors' Committee's 2004 exams (.2); correspondence with J. Yim regarding same (.3); correspond with litigation team regarding chambers correspondence with M. Moore (.5); follow up with potential expert witness (.2); call with J. Tecce regarding causes of action (.1).	2.10	4,084.50
02/12/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	2.20	462.00
02/12/25	PT	Formalize letter agreement with expert witness (.5).	0.50	972.50
02/12/25	SA4	Review documents for privilege (.1).	0.10	103.50
02/12/25	LF5	Review document batches for privilege and identify where redactions are necessary (7.7).	7.70	7,969.50
02/13/25	LMW	Emails with R. Izakelian re: privilege redactions (.2); review documents re: same (1.8).	2.00	3,330.00
02/13/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	2.20	462.00
02/13/25	LF5	Review document batches for privilege and identify where redactions are necessary (3.4).	3.40	3,519.00

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02/13/25	PT	Call with David Eaton, Spencer Wells, James Tecce to discuss litigation options and considerations for same (.5); multiple emails with litigation teams regarding privilege protection in special committee investigation and terms of protective order (.7); correspond with S. Lemmon regarding same (.3); respond to R. Szkoda regarding privilege protections (.2); correspond with T. Schmeltz regarding privilege issues (.3); review and comment on draft adequate protection stipulation (.2); multiple conferences with M. Robinson regarding privilege issue (.5).	2.70	5,251.50
02/13/25	PT	Formalize letter agreement with expert witness (.5).	0.50	972.50
02/13/25	SA4	Review documents for privilege (.7).	0.70	724.50
02/14/25	AJ4	Research case law regarding attorney-client privilege and work product doctrine (1.8).	1.80	2,808.00
02/14/25	SA4	Review documents for privilege (.9).	0.90	931.50
02/14/25	ZM2	Conduct privilege review of documents for attorney-client privilege and attorney work product assertions (3.1).	3.10	4,448.50
02/14/25	PT	Correspond with A. Jaquet regarding follow up supplemental research on privilege issue to write comprehensive memorandum on issue (.2); additional online research regarding privilege in restructuring committees and investigations (.6); coordinate updated calendar for answer to complaint (.2); correspondence with S. Schultz regarding mediation strategy (.4); correspondence with D. Kaltman regarding 2004 letters (.4); forward 2004 resolution letters to potential	6.30	12,253.50

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Creditor Committee deponents for execution (.4); review and revise mediation statement (.7); emails with C. Topping and M. Soule regarding same (.3); correspond with B. Asay and E. Brannen regarding details to be filled in in mediation statement (.4); correspond with S. Lemmon and K. Lee regarding agreed 2004 deferral (.4); review B. Asay email to Foley team regarding phase 2 setting (.3); coordinate Stris and special committee meeting with T. Schmeltz and J. Stokes (.4); correspond with C. Blackmon regarding 2004 extension agreement (.4); consolidate multiple revisions to mediation statement (.5); correspond with mediator chambers transmitting mediation statement (.5); correspond with S. Schultz regarding mediation logistics (.2).

02/14/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	1.60	336.00
02/14/25	LF5	Review document batches for privilege and identify where redactions are necessary (6.0); emails to team regarding status of privilege review and next steps (.1).	6.10	6,313.50
02/14/25	BH2	Email communications with A. Swartz regarding the summonses issued (.2); prepare the Certificates of Service for Whinstone and Riot (.4) and file same (.3); calendar the response date (.1); coordinate mailout of the summonses and Complaint (.1).	1.10	720.50
02/15/25	LMW	Emails with R. Izakelian re: privilege review (.4); review of documents for redactions (2.2).	2.60	4,329.00
02/15/25	PT	Correspondence regarding mediation strategy calls with Akin (.6).	0.60	1,167.00

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02/15/25	BR4	Review confidential mediation statement (0.5); emails regarding call with SAFE parties regarding same (0.1).	0.60	936.00
02/16/25	PT	Telephone conference with M. Robinson regarding mediation strategy and presentation (1.0).	1.00	1,945.00
02/16/25	PT	Mediation planning call with Sarah Schultz, Mitchell Hurley, B. Roth (8).	0.80	1,556.00
02/16/25	PT	Prepare for (.5) and participate in litigation update call with Spencer Wells, John Stokes, David Eaton, Charles Topping, Kathleen Matsoukas, Trace Schmeltz (.6).	1.10	2,139.50
02/16/25	BR4	Attend board call regarding mediation (2.3); emails regarding same (0.6).	2.90	4,524.00
02/17/25	AJ4	Review and revise the memorandum regarding privilege in connection with special committee, including by reviewing related materials and case law (8.4).	8.40	13,104.00
02/17/25	RH9	Legal research into abstention doctrine (.4).	0.40	466.00
02/17/25	PT	Correspondence with chambers regarding mediation versus phase 2 (.50); pre-call for Foley meet and confer (.10); attend meet and confer regarding phase 2 and proposal to resolve phase 2 issues with Mark Moore, Bridget Asay, Michael Thomas, Rob Slovak, Steven Lockhart (.50); correspond with A. Jaquet regarding facts underlying privilege issues (.2); additional online research (.8); coordinate additional discovery to Akin team (.50); continued correspondence with B. Asay regarding the effect of claim objections on litigation issues (.50); extended correspondence with D.	4.10	7,974.50

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		Proman regarding mediation strategy (.50); telephone conferences with M. Robinson regarding mediation strategy (.50).		
02/18/25	AJ4	Review and revise memorandum regarding privilege in connection with special committee, including by reviewing related materials and case law (9.1).	9.10	14,196.00
02/18/25	RI	Review and analyze documents (2.2).	2.20	3,663.00
02/18/25	RH9	Draft objection to motion to remove reference (3.6).	3.60	4,194.00
02/18/25	LF5	Complete redactions for privileged documents (0.5).	0.50	517.50
02/18/25	ZM2	Review documents and apply redactions for assertions of privilege (3.0).	3.00	4,305.00
02/18/25	PT	All hands meeting preparation for mediation (.5); correspondence with M. Hurley regarding power contracts (.3); correspondence with M. Hurley regarding valuation of energy contracts (.2); correspondence regarding expert retention issues (.2); analysis of power rate differential to market (.8); correspond with K. Hays regarding contract to market calculation and chart (.5); correspondence with Akin team regarding privilege issues (.3); review and comment on mediation presentation (.8).	3.60	7,002.00
02/18/25	LY1	Review and finalize production documents per request from R. Izakelian.	0.80	168.00
02/18/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	3.10	651.00
02/19/25	AJ4	Review and revise the memorandum regarding privilege in connection	2.50	3,900.00

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		with special committee (2.5).		
02/19/25	AJ4	Correspond with P. Tomasco, R. Izakelian, et al. Regarding revisions to assumption order (0.3).	0.30	468.00
02/19/25	RH9	Draft the objection to the motion to remove the reference (4.8).	4.80	5,592.00
02/19/25	BR4	Attend mediation (partial) (6.5).	6.50	10,140.00
02/19/25	PT	Review and discuss Genesis filing in Terreform (.40).	0.40	778.00
02/19/25	PT	Prepare for and attend mediation session in Dallas (11.0); review and revise the phase 2 motion in limine (.3); review and comment on the privilege memorandum (.3) and discuss with C. Topping (.1); draft the proposed agreed order on assumption of Whinstone contracts and multiple iterations of same (.4); coordinate follow up call with Akin team(.1).	12.20	23,729.00
02/19/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	2.80	588.00
02/19/25	BH2	Email communication with M. Viramontes regarding the Supplemental Witness and Exhibit List (.3); review a rough draft of the Supplemental Exhibit List (.2).	0.50	327.50
02/19/25	LF5	Redact document batches for attorney-client privilege (6.0).	6.00	6,210.00
02/19/25	BH2	Handle service of the Order Setting Rule 7016 Conference entered in Adversary 25-3047 (.3); draft the Certificate of Service (.6) and file with the Court (.3).	1.20	786.00
02/20/25	PT	Telephone conference with D. Eaton (.50); telephone conference with M. Robinson (.50); draft email to S. Schultz regarding conflict issue (..3); circulate to CRO/ID team (..1);	11.10	21,589.50

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Mediation Board debrief with Chase Blackmon; Cameron Blackmon; Jonas Norr; Renata Szkoda; David Eaton; Spencer Wells; Charles Topping; Morgan Soule; Kevin Hays; Michael Robinson; David Dunn (1.0); litigation coordination call with Chase Blackmon, Cameron Blackmon, Morgan Soule, Michael Robinson, Kevin Hays, Charles Topping, Will Thompson, Bridget Asay, John Cohn (.4); circulate proposed agreed order assuming contracts with Foley team (.1); prepare for (.6) and participate in mediation follow up call with Akin team, Judge Mullin (1.0); coordinate signatures on 2004 agreements (.50); correspond with C. Topping regarding prior litigation with Celsius (.50); correspond with D. Kaltman regarding 2004 agreements (.50); correspond with C. Blackmon regarding same (.50); correspond with Stris team regarding pleadings to file in light of agreed order on motion to assume (.50); correspond with Judge Mullin regarding papering the agreement (.50); circulate mediation order ahead of follow up conference call (.1); research prior proceedings in Celsius chapter 11 regarding Rhodium (.9); follow up conference with CRO/ID team regarding mediation follow up (.50); multiple correspondence regarding Akin presentation slides (.50); conference with E. Brannen regarding mediation slides (.4); multiple review and revision of agreed assumption order (.6); coordinate with Foley team regarding same (.60).

02/20/25

RH9

Draft objection to Whinstone's motion to remove the reference (8.4).

8.40

9,786.00

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02/20/25	BH2	Serve the Order Setting Rule 7016 Conference (ECF No. 15) (has a new hearing date) to the Defendants (.3) and draft Certificate of Service (.2); file same (.3).	0.80	524.00
02/20/25	LF5	Redact privileged documents (.5).	0.50	517.50
02/21/25	PT	Prepare for (.8) and participate in the status conference (.2); board call to discuss the mediation with Chase Blackmon, Cameron Blackmon, Nathan Nichols, Jonas Norr, Renata Szkoda, David Eaton, Spencer Wells, Charles Topping, Morgan Soule, Kevin Hays, Michael Robinson, David Dunn (1.0); review and revise the objection to the motion to withdraw the reference (1.5); multiple rounds of revisions and correspondence to settle agreed assumption order (1.5); coordinate finalization and filing under Greensheet (1.1); review threatening emails from D. Proman (1.0); correspondence regarding response and best course of action (1.0).	8.10	15,754.50
02/21/25	RH9	Draft and proof objection and order to motion to remove the reference (4.0).	4.00	4,660.00
02/21/25	BH2	Finalize (.4) and file the proposed agreed order to assume the Whinstone Contracts (.3).	0.70	458.50
02/21/25	BH2	Enter electronic notices for several attorneys for the 9:00 a.M. Hearing (.2); attend the hearing (.2); email communications with P. Tomasco regarding the canceled Phase 2 hearing (.1).	0.50	327.50
02/22/25	ZM2	Review and revise redactions for privilege assertions (0.5).	0.50	717.50
02/24/25	AJ4	Review Whinstone's notice of appeal (0.2).	0.20	312.00

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02/24/25	LMW	Review of privilege documents (2.2); prepare same for production (2.1).	4.30	7,159.50
02/24/25	PT	Mediation permutations discussion Michael Robinson; Chase Blackmon; Charles Topping; Cameron Blackmon; Morgan Soule; Andrew Popescu (.5); discuss mediation strategy Kevin Hays; Michael Robinson; Chase Blackmon; Charles Topping; Cameron Blackmon; Morgan Soule; Andrew Popescu; Jon Cohn; John Stokes; David Dunn (.5); correspond with Judge Mullin regarding follow up session (.5); follow up discussion with C. Blackmon (.5); correspond with S. Wells regarding availability for session (.2).	2.20	4,279.00
02/25/25	BR4	Call with mediator and debtor parties (1.6); emails regarding mediation (0.6).	2.20	3,432.00
02/25/25	LMW	Emails to R. Izakelian re: privilege review (.6).	0.60	999.00
02/25/25	PT	Mediation Response discussion call with Kevin Hays , Michael Robinson; Chase Blackmon; Charles Topping; Cameron Blackmon; Morgan Soule; Andrew Popescu; Jon Cohn; John Stokes; David Dunn; Ben Roth; Will Thompson (1.); litigation coordination call with Chase Blackmon, Cameron Blackmon, Morgan Soule, Michael Robinson, Kevin Hays, Charles Topping, Will Thompson, Bridget Asay, John Cohn (.50); prepare for and present at mediation follow up with Judge Mullin (.50); correspond with S. Schultz regarding appropriate lines of communication (.60); review and comment to response to Akin missive regarding search terms (.50); review and comment on D. Proman	4.10	7,974.50

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		threatening emails to independent directors (.50); review and revise proposed email to Judge Mullin (.50).		
02/26/25	AJ4	Review and analyze investigation report (1.4).	1.40	2,184.00
02/26/25	AJ4	Review and analyze bankruptcy rules regarding appeals (0.3).	0.30	468.00
02/26/25	PT	Litigation strategy meeting with Kevin Hays; Michael Robinson; Chase Blackmon; Charles Topping; Cameron Blackmon; Morgan Soule; Andrew Popescu; Jon Cohn; John Stokes; David Dunn; Ben Roth; Will Thompson (1.4); correspond with J. Stokes regarding meet and conference with Akin team (.50); conference with Stris team regarding lever production (.50); review and comment on letter from Akin regarding mediation (.40).	2.80	5,446.00
02/26/25	BH2	Email exchange with N. He (Barnes & Thornburg) regarding procedures to access the Special Committee Investigation Report (.3); forward a downloaded copy to attorneys and the Client for review (.1).	0.40	262.00
02/26/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	2.10	441.00
02/27/25	RI	Review and analyze documents for privilege (3.7).	3.70	6,160.50
02/27/25	AJ4	Research case law regarding debtor-in-possession's powers to settle litigation pursuant to 11 USC 323 (1.1).	1.10	1,716.00
02/27/25	PT	Litigation coordination call with Chase Blackmon, Cameron Blackmon, Morgan Soule, Michael Robinson, Kevin Hays, Charles Topping, Will Thompson, Bridget Asay (.90).	0.90	1,750.50

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02/27/25	LMW	Review documents re: privilege (2.6); emails to R. Izakelian re: same (.2).	2.80	4,662.00
02/27/25	RL1	Run web page collections for attorney review and use (.9); export collections into PDF form documents (.2).	1.10	231.00
02/27/25	PT	Participate in meet and confer with Karen Yang; Razmig Izakelian; L Emmon; Rhonda Mates; Stokes; B. Asay; P. Brody; Mitchell Hurley; Elizabeth Scott; Sarah Schultz; Trace Schmeltz; Charlotte Underwood (.9); review and analysis of Akin letter to independent directors (.4) and emails with D. Eaton and S. Wells regarding same (.3); correspondence with Judge Mullin regarding threatening emails from D. Proman (.5); update CROs and IDs regarding Proman emails (.30); call with Judge Mullin (.30).	2.70	5,251.50
02/27/25	RV2	Prepare documents into proper format to facilitate attorney review per request from R. Izakelian.	3.90	819.00
02/28/25	RI	Review document for privilege (3.2).	3.20	5,328.00
02/28/25	LMW	Review of documents for privilege (2.6); emails to litigation support re: same (.3).	2.90	4,828.50
02/28/25	LY1	Review and finalize production documents per request from R. Izakelian.	0.90	189.00
02/28/25	RV2	Prepare document production per request from R. Izakelian.	4.70	987.00
SUBTOTAL			332.90	433,529.50

xiii Non-working Travel

02/18/25	BR4	Travel to Dallas for mediation (6.6).	6.60	10,296.00
02/19/25	BR4	Travel back from Dallas mediation (6.9).	6.90	10,764.00
02/20/25	PT	Travel to Houston (3.0).	3.00	5,835.00

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SUBTOTAL	16.50	26,895.00
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xiv Plan and Disclosure Statement

02/01/25	PT	Review and extensive revisions to plan term sheet and issue list (0.4); email to D. Dunn and M. Robinson regarding same (0.5); revise release language to incorporate suggested changes (0.5).	1.40	2,723.00
02/02/25	PT	Additional revisions to plan term sheet (0.8); review and send revised plan term sheet to S. Schultz (0.2); follow up emails with M. Robertson and D. Dunn regarding meeting with D. Proman (0.5).	1.50	2,917.50
02/03/25	PT	Coordinate with B. Asay regarding the production of the updated plan projections (0.4).	0.40	778.00
02/05/25	PT	Conference call with Sarah Schultz, David Dunn, David Eaton, Trace Schmeltz, Michael Robinson, Mitchell Hurley (.50); follow up discussion with Sarah Schultz, David Dunn, David Eaton, Trace Schmeltz, Michael Robinson, Mitchell Hurley (0.5).	1.00	1,945.00
02/06/25	BR4	Revise the plan (4.1).	4.10	6,396.00
02/07/25	PT	Coordinate with D. Holzman regarding updated take back paper terms (.20); coordinate with J. Brookner regarding update questions on plan process and timing (.30).	0.50	972.50
02/07/25	LMW	Review of the take-back note term sheet (1.2); incorporate same into the disclosure statement (1.3).	2.50	4,162.50
02/10/25	PT	Correspond with M. Robinson regarding plan timeline (.4).	0.40	778.00
02/10/25	LMW	Emails with Quinn Emanuel team re: timing of the plan filing (.5).	0.50	832.50

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02/10/25	BR4	Research related to plan construct (1.0).	1.00	1,560.00
02/11/25	PT	Search for exemplars of plan provisions consistent with current plan outline (.30); coordinate incorporating into plan draft (.30); correspond with B. Roth regarding G. Steinman questions on plan provisions (.30).	0.90	1,750.50
02/11/25	LMW	Review edits to the updated plan (1.4); emails with R. Izakelian and B. Roth re: same (.3); call with B. Roth re: edits to the disclosure statement (.6).	2.30	3,829.50
02/11/25	BR4	Call with L. Weber regarding the plan and disclosure statement (0.2); review and revise plan (2.5).	2.70	4,212.00
02/11/25	RI	Review and revise the plan (.6), legal research regarding section 506(b) (.8).	1.40	2,331.00
02/12/25	PT	Correspond with H. Nguyen and A. Popescu regarding WAB bond charges (.10); research the ability of WAB to charge fees in account agreement; correspondence with A. Popescu regarding same (.10).	0.20	389.00
02/12/25	BR4	Review and revise the plan (2.6); research related to same (1.2).	3.80	5,928.00
02/13/25	LMW	Emails to R. Izakelian and B. Roth re: updates to the plan and disclosure statement (.8); review and revise the disclosure statement re: same (1.4).	2.20	3,663.00
02/13/25	BR4	Review and revise the plan (6.2).	6.20	9,672.00
02/14/25	PT	Conference with Chase Blackmon, Cameron Blackmon, Nathan Nichols, Jonas Norr, Renata Szkoda, David Eaton, Spencer Wells, Charles Topping, Morgan Soule, Kevin Hays, Michael Robinson, David Dunn regarding the plan (1.6).	1.60	3,112.00
02/14/25	BR4	Review and revise the plan (2.5).	2.50	3,900.00

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02/16/25	BR4	Review and revise the plan (1.8); emails regarding same (0.4).	2.20	3,432.00
02/18/25	RI	Review and revise the plan of reorganization (2.4).	2.40	3,996.00
02/19/25	RI	Review and revise the plan of reorganization (1.1).	1.10	1,831.50
02/19/25	BR4	Review and revise the plan (0.6); emails regarding same (0.4).	1.00	1,560.00
02/20/25	BR4	Review and revise the plan (3.2) research related to same (1.9).	5.10	7,956.00
02/21/25	BR4	Review the settlement materials (0.8); revise the plan (0.5).	1.30	2,028.00
02/24/25	LMW	Review and revise the disclosure statement (1.2); emails to B. Roth re: same (.3).	1.50	2,497.50
02/24/25	BR4	Review and revise the disclosure statement (2.3).	2.30	3,588.00
02/25/25	AJ4	Research application of Fed. R. Civ. P. 23 and possible analogies in relation to chapter 11 plan confirmation (0.8).	0.80	1,248.00
02/25/25	LMW	Review and revise the disclosure statement (3.1); emails to B. Roth re: same (.4).	3.50	5,827.50
02/25/25	BR4	Call with L. Weber regarding the disclosure statement (1.2); emails regarding same (0.1).	1.30	2,028.00
02/26/25	AJ4	Correspond with P. Tomasco regarding research on the application of Fed. R. Civ. P. 23 and possible analogies in relation to chapter 11 plan confirmation (0.2).	0.20	312.00
02/26/25	BR4	Prepare exclusivity motion (2.7).	2.70	4,212.00
02/26/25	PT	Correspond with A. Jaquet regarding research related to consensual third party releases (.30); online research regarding same (.30).	0.60	1,167.00

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02/26/25	LMW	Review and revise the disclosure statement (2.7); emails to B. Roth re: same (.2).	2.90	4,828.50
02/27/25	AJ4	Research application of Fed. R. Civ. P. 23 and possible analogies in relation to chapter 11 plan confirmation (5.2).	5.20	8,112.00
02/27/25	BR4	Review and revise exclusivity motion (1.8).	1.80	2,808.00
02/27/25	LMW	Review and revise the disclosure statement (4.2); call with B. Roth re: same (1.1); review and revise the draft plan (.8).	6.10	10,156.50
02/27/25	BR4	Review and revise the disclosure statement (0.7).	0.70	1,092.00
02/28/25	AJ4	Review and revise memorandum regarding application of Fed. R. Civ. P. 23 and possible analogies in relation to chapter 11 plan confirmation. (7.2).	7.20	11,232.00
02/28/25	BR4	Review and revise the motion to extend exclusivity (1.4).	1.40	2,184.00
02/28/25	PT	Review and revise motion to extend exclusivity (.6); circulate to the Client for review (.2).	0.80	1,556.00
02/28/25	BH2	Research Opt Out Releases as requested by A. Jaquet (.4); forward same to A. Jaquet (.1).	0.50	327.50
02/28/25	BR4	Review and revise the disclosure statement (0.9).	0.90	1,404.00
SUBTOTAL			90.60	147,236.00

xv Relief from Stay and Adequate Protection

02/26/25	PT	Correspond with C. Topping regarding litigation hold letters as violative of automatic stay (.30).	0.30	583.50
SUBTOTAL			0.30	583.50

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Matter #: 12875-00001

Invoice Number: 101-0000185500

Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
Patty Tomasco	PT	Partner	162.90	1,945.00	316,840.50
Daniel Holzman	DH3	Counsel	0.20	1,775.00	355.00
Razmig Izakelian	RI	Associate	33.90	1,665.00	56,443.50
Lindsay M. Weber	LMW	Associate	43.30	1,665.00	72,094.50
Alain Jaquet	AJ4	Associate	60.80	1,560.00	94,848.00
Ben Roth	BR4	Associate	122.70	1,560.00	191,412.00
Zach Meeker	ZM2	Associate	6.60	1,435.00	9,471.00
Eli Pales	EP1	Associate	4.20	1,315.00	5,523.00
Rachel Harrington	RH9	Associate	38.60	1,165.00	44,969.00
Scott Anderson	SA4	Associate	3.90	1,035.00	4,036.50
Lance Frankel	LF5	Associate	60.20	1,035.00	62,307.00
Case Assistants	Init.	Title	Hours	Rate	Amount
Barbara J Howell	BH2	Paralegal	47.90	655.00	31,374.50
Litigation Support/Document Management Services	Init.	Title	Hours	Rate	Amount
Ryan Lopez	RL1	Litigation Support	1.10	210.00	231.00
Raul Vasquez	RV2	Litigation Support	48.30	210.00	10,143.00
Linda Yanez	LY1	Litigation Support	1.70	210.00	357.00

Expense Summary

Description	Amount
Postage	26.08
Meals during travel	43.78
Express mail	60.86
Filing fee(s)	350.00
Hearing transcript(s)	58.40
Online Research	0.00
Document Reproduction	0.10 129.80
Travel	122.09
Hotel	1,737.21

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Matter #: 12875-00001

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Description	Amount
Professional services - Other	8,021.25
Out-of-Town Travel	233.25
Air travel	638.96
Local meals	26.63

Litigation Support Costs

(Charges based on market not cost)

RelOne User Fee	0.00
RelOne TIFF (per page)	0.00
RelOne Processing	0.00
RelOne Active Hosting (Per GB)	1,351.64
Total Expenses	\$12,799.95