

**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
TWELFTH MONTHLY FEE STATEMENT FOR THE PERIOD
AUGUST 1, 2025, THROUGH AUGUST 31, 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 August 1, 2025, through August 31, 2025 (the “Twelfth Monthly Fee Statement”).

Quinn Emanuel seeks payment of interim compensation in the total amount of \$489,830.80 (80% of the services rendered), plus \$5,815.48 (100% of the interim expenses incurred). Summaries of the fees and expenses are in 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 Twelfth 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), and Alain Jaquet (alainjaquet@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 (crgibbs@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 Order, 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 2nd day of October, 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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- and -

Eric Winston (*pro hac vice*)

Razmig Izakelian (*pro hac vice*)

Ben Roth (*pro hac vice*)

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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	6.2	\$11,435.00	\$9,148.00
v	Business Operations	.7	\$1,361.50	\$1,089.20
vi	Case Administration	77.7	\$107,175.00	\$85,740.00
vii	Claims Administration and Objections	131.8	\$193,373.00	\$154,698.40
viii	Corporate Governance and Board Matters	3.7	\$7,196.50	\$5,757.20
ix	Employee Benefits and Pensions	57.6	\$98,298.00	\$78,638.40
x	Employment and Fee Applications	15.6	\$11,895.00	\$9,516.00
xi	Financing/Cash Collateral	0.0	\$0.00	\$0.00
xii	Litigation	6.8	\$13,226.00	\$10,580.80
xiii	Non-working Travel	0.0	\$0.00	\$0.00
xiv	Plan and Disclosure Statement	93.5	\$156,919.00	\$125,535.20
Xv	Relief from the Stay	6.8	\$11,409.50	\$9,127.60
	Total	400.4	\$612,288.50	\$489,830.80

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	101.5	\$197,417.50
Eric D. Winston	Partner	1999	Bankruptcy & Restructuring	\$1,990.00	1.1	\$2,189.00
Daniel Holzman	Counsel	1999	Bankruptcy & Restructuring	\$1,775.00	0.0	\$0.00
Razmig Izakelian	Associate	2013	Bankruptcy & Restructuring	\$1,665.00	5.2	\$8,658.00
Lindsay Weber	Associate	2008	Bankruptcy & Restructuring	\$1,665.00	104.1	\$173,326.50
Ben Roth	Associate	2019	Bankruptcy & Restructuring	\$1,560.00	28.5	\$44,460.00
Alain Jaquet	Associate	2016	Bankruptcy & Restructuring	\$1,560.00	41.1	\$64,116.00
Rachel Harrington	Associate	2024	Bankruptcy & Restructuring	\$1,165.00	67.6	\$78,754.00
Nqulelwa Maseti	Associate	2025	Intellectual Property Litigation	\$1,035.00	25.7	\$26,599.50
Barbara J. Howell	Paralegal		Bankruptcy & Restructuring	\$655.00	25.6	\$16,768.00
Total					400.4	\$612,288.50

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

Expense	Amount
Hearing Transcripts	\$31.05
RelOne Repository Hosting	\$1,479.14
RelOne Active Hosting	\$4,305.29
Total	\$5,815.48

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

September 16, 2025

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

Matter #: 12875-00001
Invoice Number: 101-0000196272
Responsible Attorney: Patty Tomasco

Rhodium- restructure of company

For Professional Services through August 31, 2025 in connection with a potential restructuring of this crypto mining company.

Fees	\$612,288.50
Expenses	<u>\$5,815.48</u>
Net Amount	\$618,103.98
Total Due This Invoice	\$618,103.98
Balance Due from Previous Statement(s)	\$2,759,554.93
Total Balance Due	<u>\$3,377,658.91</u>

Confidential – May include attorney-client privileged and work-product information

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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

D

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Statement Detail**ii Asset Disposition**

08/01/25	PT	Correspondence with J. Wolfshohl regarding allocation of sales proceeds pending resolution with Whinstone and scheduling call to discuss (.5); follow up with AJ Merton regarding tax litigation procedures relevant to varying allocation methodology (.3).	0.80	1,556.00
08/06/25	PT	Follow on missing titles with Whinstone and Rhodium (.1).	0.10	194.50
08/07/25	RH9	Review sale order to identify and distribute relevant provisions (.8).	0.80	932.00
08/25/25	PT	Correspond with S. Lockhart regarding sales price allocation follow up call (.2).	0.20	389.00
08/26/25	PT	Correspondence regarding purchase price allocation (.3).	0.30	583.50
08/27/25	PT	Coordinate call with Whinstone team regarding purchase price allocation (.2).	0.20	389.00
08/28/25	PT	Conference call with C. Wheeler, K. Hays and M. Robinson regarding tax allocation refinement (.7); conference call with Whinstone team regarding same (1.1).	1.80	3,501.00
08/29/25	PT	Detailed list of issues from Whinstone call (.9); call with K. Hays, C. Wheeler and M. Robinson regarding same (.9); follow up with S. Lockhart regarding need for additional information and call (.2).	2.00	3,890.00
SUBTOTAL			6.20	11,435.00

ix Employee Benefits and Pensions

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07/09/25	LMW	Legal research re: severance post-petition (2.1); emails to A. Popescu re: schedule of payments (.2).	2.30	3,829.50
07/10/25	LMW	Emails to A. Popescu re: edits to severance schedule (.4); call with C. Topping re: same (.4); review and revise schedule (1); call with QE team re: case updates (.6).	2.40	3,996.00
07/14/25	LMW	Review of document objections (.7); review and revise severance schedule (1.2); emails to A. Catatao re: same (.3); emails with Quinn Emanuel team re: updates to plan confirmation (.5).	2.70	4,495.50
07/16/25	LMW	Emails with C. Topping re: severance payments (1.1); emails with Quinn Emanuel team re: same (.3); call with Rhodium re: same (.8); emails with C. Topping re: amendments to severance schedule (.4); emails with A. Jaquet re: borrowing statutes and statute of limitations (.3); legal research re: same (2.8).	5.70	9,490.50
07/17/25	LMW	Emails with Quinn Emanuel team re: derivative standing (.4); call with C. Topping and C. Blackmon re: severance (.5); review and revise schedule re: same (1.8); emails re: C. VanHooren severance agreement (1).	3.70	6,160.50
07/18/25	LMW	Emails with A. Catatao re: Asset Purchase Agreement party settlements (.8); emails to Quinn Emanuel team re: same (.3).	1.10	1,831.50
07/22/25	LMW	Review and revise severance schedule (.6); emails to C. Topping re: C. VanZaeren Agreement (.2).	0.80	1,332.00
07/23/25	LMW	Review and revise the severance schedule (1.5); emails to A. Catatao re: same (.2); emails to C. Blackmon re: document collections (.2); call with	2.90	4,828.50

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		counsel for C. VanZoeren re: severance agreement (.7); emails to Province re: severance schedule (.3).		
07/24/25	LMW	Review and revise the severance supplement (.6); emails to A. Popescu re: same (.2).	0.80	1,332.00
07/28/25	LMW	Legal research re: 503 severance payments (1.6); prepare cover email re: same (2.3); prepare chart re: caselaw on same (3.3).	7.20	11,988.00
07/30/25	LMW	Emails to counsel for C. VanZoeren re: severance (.2).	0.20	333.00
07/31/25	LMW	Emails to C. Blackmon re: document collections (.2); emails to A. Popescu re: severance schedule (.2); review of SAFE request for status conference on Officer and Director claims (.5).	0.90	1,498.50
08/01/25	LMW	Call with counsel for C. VanZoeren re: severance (.5); emails to Quinn Emanuel and Rhodium teams re: same (.4); review and revise severance schedule (1.8); emails to Province re: same (.4).	3.10	5,161.50
08/01/25	AJ4	Review and revise the chart relating to severance of employees (1.1); correspond with L. Weber regarding the same (0.1).	1.20	1,872.00
08/01/25	PT	Review and revise employee claim exhibit for plan (.2); circulate chart with C. Topping and Morgan Soule with commentary (.3).	0.50	972.50
08/04/25	LMW	Review of C. VanZoeren claim (.8); legal research re: for cause termination (1.5); emails to C. Topping re: same (.2).	2.50	4,162.50
08/05/25	LMW	Emails with C. Topping re: C. VanZoeren (.2); call re: same (.4); emails to counsel re: settlement (.6).	1.20	1,998.00

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08/07/25	LMW	Emails to C. Topping re: severance schedule (.5); emails to P. Tomasco re: same (.1).	0.60	999.00
08/07/25	PT	Correspondence with L. Weber and A. Catatao regarding severance programs (.4).	0.40	778.00
08/08/25	LMW	Review of severance schedule (.3); call with Rhodium team re: same (.6).	0.90	1,498.50
08/08/25	PT	Extended conference with C. Topping regarding severance plan issues and timing of various reductions and follow-up call with L. Weber (.9); correspond with L. Weber regarding implementing protocols as discussed (.2).	1.10	2,139.50
08/11/25	LMW	Review and revise severance schedule (.6); emails to Asset Purchase Agreement parties re: same (.2); prepare employment contracts for production (.8).	1.60	2,664.00
08/11/25	PT	Participate in severance update call with Michael Fox, Brenda Funk, Michael Robinson, Thomas Fleming, Lindsay Weber, Trace Schmeltz (.8); follow-up call with L. Weber regarding remaining personnel issues (.2).	1.00	1,945.00
08/15/25	PT	Call to evaluate employee severance and independent contractor contracts with Andrew Popescu, Charles Topping, Michael Robinson, Chase Blackmon, Cameron Blackmon, David Dunn (.9); follow-up correspondence regarding vesting RSUs (.3); research regarding exemplar case allowing severance claims under 502(b)(7) (.5).	1.70	3,306.50
08/15/25	LMW	Call with counsel for C. Vanzoeren re: severance claim (.5); emails to C. Topping re: same (.2).	0.70	1,165.50

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08/18/25	PT	Call to discuss employee conversion to independent contractors Andrew Popescu, Cameron Blackmon, Charles Topping, Michael Robinson, Chase Blackmon, David Dunn (.7); follow up on updated LTIP vesting in amended equity schedule and strategic considerations (.3); second call regarding management reductions and severance with C. Topping, M. Robinson, C. Blackmon, C. Blackmon. (.8).	1.80	3,501.00
08/18/25	LMW	Emails to C. Topping re: C. VanZaeren claim (.3); follow up with C. VanZaeren's counsel re: same (.1).	0.40	666.00
08/20/25	PT	Review effects on converting employees to independent contractors with M. Robinson (.3).	0.30	583.50
08/20/25	LMW	Emails to A. Popscue re: severance schedule (.4); call with Rhodium team re: same (.4); emails with A. Catatao re: employee departures (.8); review of severance schedule re: same (1.3).	2.90	4,828.50
08/21/25	PT	Conference to discuss executive reduction in force with Andrew Popescu, Chase Blackmon, Alicia Catatao, Michael Robinson, Lindsay Weber, Charles Topping (.7).	0.70	1,361.50
08/21/25	PT	Correspond with C. Topping regarding revisions to executive employment agreements (.2) research regarding fractional CFO agreements (.4).	0.60	1,167.00
08/22/25	LMW	Review of severance agreements and payment calculations (1.3); emails to M. Soule re: same (.2).	1.50	2,497.50
08/22/25	PT	Strategy call regarding employee severance with Cameron Blackmon, Michael Robinson, Chase Blackmon (.3).	0.30	583.50

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08/26/25	LMW	Emails to C. Topping re: severance agreements (.4); review correspondence re: same (.3).	0.70	1,165.50
08/26/25	PT	Correspond with C. Topping and L. Weber regarding severance plan exhibit (.2).	0.20	389.00
08/27/25	PT	Conference call regarding strategy for optimal CFO role and cost reductions (.4).	0.40	778.00
08/28/25	LMW	Emails to C. Topping re: employee severance (.3); emails with QE team re: termination of exclusivity (.3).	0.60	999.00
SUBTOTAL			57.60	98,298.00

v Business Operations

08/15/25	PT	Conference with C. Topping regarding privilege issues and retrieve existing research regarding likely outcome (.6); correspondence regarding director fees (.1).	0.70	1,361.50
SUBTOTAL			0.70	1,361.50

vi Case Administration

07/09/25	LMW	Quinn Emanuel call re: case updates (.5).	0.50	832.50
07/15/25	LMW	Call with Quinn Emanuel team re: case updates (.5).	0.50	832.50
07/22/25	LMW	Call with Quinn Emanuel team re: case updates (.5).	0.50	832.50
07/28/25	LMW	Call with Quinn Emanuel team re: case updates (.6).	0.60	999.00
08/01/25	PT	Prepare for (.2) and attend strategy call with Michael Robinson, Razmig Izakelian, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Ben Roth, Lindsay Weber (.5).	0.70	1,361.50

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08/01/25	PT	Correspondence with T. Schmeltz regarding finalization of insurance settlement and lack of finalization of same (.3); review and revise response to motion for status conference and circulate same (1.2).	1.50	2,917.50
08/01/25	NM7	Team conference meeting (.5).	0.50	517.50
08/01/25	AJ4	Attend telephone conference with P. Tomasco et al. Regarding case status and next steps (0.5).	0.50	780.00
08/01/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (0.5).	0.50	832.50
08/04/25	LMW	Call with Quinn Emanuel team re: case updates (.6).	0.60	999.00
08/04/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (.6).	0.60	936.00
08/04/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (0.6).	0.60	999.00
08/04/25	PT	Prepare for (.3) and participate in the strategy and coordination call with Michael Robinson, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Razmig Izakelian, Ben Roth (.6).	0.90	1,750.50
08/06/25	PT	Strategy and coordination call with Michael Robinson, Razmig Izakelian, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Ben Roth (.6).	0.60	1,167.00
08/06/25	RH9	Conference with Quinn Emanuel and Province teams to discuss next steps (.8).	0.80	932.00
08/06/25	LMW	Call with QE team re: case updates (.8).	0.80	1,332.00
08/06/25	NM7	Team conference meeting (.8).	0.80	828.00

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08/06/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (0.8).	0.80	1,332.00
08/06/25	AJ4	Attend the telephone conference with P. Tomasco, R. Harrington et al. Regarding case status and next steps (.8).	0.80	1,248.00
08/06/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (.8).	0.80	1,248.00
08/07/25	BH2	Email communications with E. Brannen regarding filing documents under seal, including exhibits on the exhibit list (.3).	0.30	196.50
08/07/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (.6).	0.60	999.00
08/07/25	RH9	Conference with Quinn Emanuel and Province teams to discuss next steps (.6).	0.60	699.00
08/07/25	LMW	Call with QE team re: case updates (.6).	0.60	999.00
08/07/25	NM7	Team conference meeting (.6).	0.60	621.00
08/07/25	BH2	Review Pacer docket (.5) and download recent filings for the attorneys' review (.5); forward filings to the Client (.1).	1.10	720.50
08/07/25	PT	Coordination call with Michael Robinson, Razmig Izakelian, Andrew Popescu, Alain Jaquet, Lewa Maseti, Rachel Harrington, Ben Roth (.6); emails with C. Blackmon regarding threatening emails from investors and formulate strategy (.3).	0.90	1,750.50
08/07/25	BR4	Call with Quinn Emanuel team regarding case updates (.6).	0.60	936.00
08/08/25	LMW	Call with Quinn Emanuel team re: case updates (.7).	0.70	1,165.50

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08/08/25	PT	Prepare for (.1) and attend the strategy call with Michael Robinson, Razmig Izakelian, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Rachel Harrington, Ben Roth (.7).	0.80	1,556.00
08/11/25	PT	Participate in a strategy call with Michael Robinson, Razmig Izakelian, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Rachel Harrington, Ben Roth (.7).	0.70	1,361.50
08/11/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (.7).	0.70	1,165.50
08/11/25	LMW	Call with Quinn Emanuel team re: case updates (.7).	0.70	1,165.50
08/11/25	NM7	Team conference meeting (0.7).	0.70	724.50
08/11/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.7).	0.70	1,092.00
08/12/25	RH9	Conference with Quinn Emanuel and Province teams to discuss next steps (.7).	0.70	815.50
08/12/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (0.7).	0.70	1,165.50
08/12/25	NM7	Team conference meeting (0.7).	0.70	724.50
08/12/25	PT	Coordination call with Michael Robinson, Razmig Izakelian, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Rachel Harrington, Ben Roth (.7).	0.70	1,361.50
08/12/25	LMW	Call with Quinn Emanuel team re: case updates (.7).	0.70	1,165.50
08/12/25	BR4	Call with Quinn Emanuel team regarding case updates (0.7).	0.70	1,092.00
08/13/25	RH9	Conference with Quinn Emanuel team to discuss next steps (.6).	0.60	699.00

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08/13/25	BH2	Review Pacer docket and download filings for attorneys' review (.5), calendaring deadlines and hearing dates (.3).	0.80	524.00
08/13/25	BR4	Call with Quinn Emanuel team regarding case updates (.6).	0.70	1,092.00
08/13/25	LMW	Call with Quinn Emanuel team re: case updates (.6).	0.60	999.00
08/13/25	PT	Daily team call with Michael Robinson, Razmig Izakelian, Quinn Emanuel Debtor team, Andrew Popescu, Alain Jaquet, Lewa Maseti, Eric Winston, Ben Roth (.6).	0.60	1,167.00
08/14/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (.7).	0.70	1,092.00
08/14/25	BH2	Review Pacer docket and order copies of the August 4th hearing transcripts (.3); obtain hearing transcript and distribute (.1); download recently filed documents (.4) and forward to the Client and attorneys (.5).	1.30	851.50
08/14/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (partial attendance) (0.3).	0.30	499.50
08/14/25	PT	Update call with Michael Robinson, Razmig Izakelian, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Rachel Harrington, Ben Roth (.7).	0.70	1,361.50
08/15/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (.6).	0.60	936.00
08/15/25	LMW	Call with Quinn Emanuel team re: case updates (.6).	0.60	999.00
08/15/25	PT	Coordination call with Michael Robinson, Razmig Izakelian, Rachel	0.60	1,167.00

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		Harrington, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Ben Roth (.6).		
08/18/25	PT	Coordination call with Michael Robinson, Razmig Izakelian, Rachel Harrington, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Ben Roth (.6).	0.60	1,167.00
08/18/25	BR4	Call with Quinn Emanuel team regarding case updates (.6).	0.60	936.00
08/18/25	LMW	Call with Quinn Emanuel team re: case updates (.6).	0.60	999.00
08/18/25	AJ4	Attend telephone conference with P. Tomasco, R. Harrington et al. Regarding case status and next steps (.6).	0.60	936.00
08/19/25	PT	Coordination call with Michael Robinson, Razmig Izakelian, Rachel Harrington, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Ben Roth (.5).	0.50	972.50
08/19/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (.5).	0.50	780.00
08/19/25	AJ4	Attend telephone conference with P. Tomasco, R. Harrington et al. Regarding case status and next steps (0.5).	0.50	780.00
08/20/25	PT	Coordination call with Michael Robinson, Razmig Izakelian, Rachel Harrington, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Ben Roth (.5).	0.50	972.50
08/20/25	RH9	Conference with Quinn Emanuel team to discuss next steps (.5).	0.50	582.50
08/20/25	LMW	Call with Quinn Emanuel team re: case updates (.5).	0.50	832.50
08/20/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (0.5).	0.50	780.00
08/20/25	NM7	Team conference meeting (0.5).	0.50	517.50

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08/21/25	NM7	Team conference meeting (.6).	0.60	621.00
08/21/25	BH2	Review Rhodium Pacer docket and update files to current status (.4).	0.40	262.00
08/21/25	BR4	Call with Quinn Emanuel team regarding case updates (0.6).	0.60	936.00
08/21/25	BH2	File the 19 Monthly Fee Statements (1.1).	1.10	720.50
08/22/25	RH9	Conference with Quinn Emanuel team to discuss next steps (.5).	0.50	582.50
08/22/25	NM7	Team conference meeting (0.5); review Rhodium letter to U.S. Trustee re new Unsecured Creditors Committee (0.1); prepare draft motion to disband new Unsecured Creditors Committee and research case law re same (1.8).	2.40	2,484.00
08/22/25	BR4	Call with Quinn Emanuel team regarding case updates (.5).	0.50	780.00
08/22/25	PT	Coordination call with Michael Robinson, Razmig Izakelian, Rachel Harrington, Andrew Popescu, Alain Jaquet, Lelwa Maseti, Ben Roth (.5).	0.50	972.50
08/24/25	NM7	Review Rhodium letter to U.S. Trustee re new Unsecured Creditors Committee (0.3); prepare draft motion to disband new Unsecured Creditors Committee and research case law in support of motion (4.0).	4.30	4,450.50
08/25/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (.5); call with R. Harrington regarding pleadings and case status (0.6); research and emails regarding same (0.6).	1.70	2,652.00
08/25/25	AJ4	Attend telephone conference with P. Tomasco, R. Harrington, et al. Regarding case status and next steps (0.5).	0.50	780.00

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08/26/25	RI	Conference with Quinn Emanuel and Province teams regarding case strategy and assignments (.5).	0.50	832.50
08/26/25	NM7	Team conference meeting (.5).	0.50	517.50
08/26/25	BR4	Call (partial) with Quinn Emanuel team regarding case updates (0.3).	0.30	468.00
08/26/25	PT	Coordination call with Quinn Emanuel and Province teams to review project status and strategy (.5).	0.50	972.50
08/27/25	NM7	Conference call with R. Harrington re motion to disband new Unsecured Creditors Committee (0.4); review Rhodium letter to U.S. Trustee re new Unsecured Creditors Committee (0.3); prepare draft motion to disband new Unsecured Creditors Committee and research case law in support of motion (3.0).	3.70	3,829.50
08/27/25	BR4	Call with Quinn Emanuel team regarding case updates (0.4).	0.40	624.00
08/27/25	RH9	Review and comment on committee motion (2.1).	2.10	2,446.50
08/28/25	RH9	Conference with Quinn Emanuel and Province teams to discuss next steps (.5).	0.50	582.50
08/28/25	PT	Attend coordination call with Quinn Emanuel and Province teams (.5).	0.50	972.50
08/28/25	LMW	Call with Quinn Emanuel team re: case updates (.5); review of evidentiary objections ruling (.6); emails with Quinn Emanuel team re: same (.2).	1.30	2,164.50
08/28/25	NM7	Team conference meeting (.5); prepare draft motion to disband new Unsecured Creditors Committee (4.1); research case law in support of motion (2.0).	6.60	6,831.00

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08/28/25	BR4	Call with QE and Province teams (partial) regarding case updates (0.2); emails regarding same (0.3).	0.50	780.00
08/29/25	RI	Prepare for (.2) and conference with Quinn Emanuel and Province teams regarding case strategy and assignments (.3).	0.50	832.50
08/29/25	NM7	Team conference meeting (0.3); prepare draft motion to disband new Unsecured Creditors Committee (1.5).	1.80	1,863.00
08/29/25	PT	Team call with Quinn Emanuel and Province teams (.3).	0.30	583.50
08/29/25	BH2	Review Pacer docket and update files to the current status, including calendaring all deadlines (.8); forward recently filed documents to the Client (.1).	0.90	589.50
08/29/25	BR4	Call with Quinn Emanuel and Province teams regarding case updates (.3).	0.30	468.00
08/30/25	BR4	Emails and call regarding court decision (0.5).	0.50	780.00
SUBTOTAL			77.70	107,175.00

vii Claims Administration and Objections

07/11/25	LMW	Review of SAFE presentation re: settlement issues (.8); emails with Province re: same. (.3).	1.10	1,831.50
07/15/25	LMW	Emails with Quinn Emanuel team re: post-petition interest (.8); review of objections to exhibits (.6); emails to A. Jaquet re: claim objections (1.1).	2.50	4,162.50
07/24/25	LMW	Prepare responses to proof of claim filed by C. VanZoooren (2.3).	2.30	3,829.50
08/01/25	AJ4	Review and revise the draft objection to claim based on their satisfaction	4.00	6,240.00

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		and other substantive grounds, including by reviewing and analyzing related background materials (4.0).		
08/01/25	PT	Review and revise employee claim exhibit for plan (.2); circulate chart with C. Topping and Morgan Soule with commentary (.3).	0.50	972.50
08/04/25	PT	Review and comment on draft rule 11 letter to Midas Green (.3).	0.30	583.50
08/04/25	AJ4	Review and revise draft objections to claims based on satisfaction of claims and other substantive grounds, including by reviewing claims, email correspondence related to claims at issues and related case law (7.7); correspond with F. Sabzevari in connection with the same (0.1).	7.80	12,168.00
08/04/25	RH9	Review and comments to Rule 11 motion (1.0); legal research into rule 11 and other basis for sanctions (5.0); draft Rule 11 letter (2.5).	8.50	9,902.50
08/04/25	BR4	Review pleadings related to SAFE disputes (.4).	0.40	624.00
08/05/25	AJ4	Review and revise draft objections to claims based on satisfaction of claims and other substantive grounds, including by reviewing claims, prior memoranda, email correspondence related to claims at issues, and related case law (7.8); correspond with F. Sabzevari and A. Popescu in connection with the same (0.4).	8.20	12,792.00
08/05/25	PT	Correspondence with E. Brannen regarding procedures for hearing (.1); review and revise proposed rule 11 letter to Midas Green and additional research regarding 1927 to include in letter (1.3).	1.40	2,723.00

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08/05/25	RH9	Implement edits to rule 11 draft and proof (1.5).	1.50	1,747.50
08/06/25	BR4	Research related to claims asserted (0.9); emails regarding same (0.3).	1.20	1,872.00
08/06/25	LMW	Review of proof capital claim objection (.4).	0.40	666.00
08/06/25	AJ4	Review and revise draft objections to claims based on satisfaction of claims and other substantive grounds, including by reviewing claims, prior memoranda and related case law (8.3).	8.30	12,948.00
08/06/25	EDW	Review draft presentation (1.1).	1.10	2,189.00
08/06/25	PT	Correspond with E. Brannen regarding hearing preparation for Midas claim objection and witness logistics (.2).	0.20	389.00
08/07/25	BR4	Review and revise materials for presentation to SAFE AHG (1.3); call regarding same with P. Tomasco, Province and Barnes & Thornburg teams (1.0).	2.30	3,588.00
08/08/25	PT	Correspond with C. Topping and R. Harrington regarding the sanctions motion timing and strategy around various bases for sanctions (.4).	0.40	778.00
08/08/25	RH9	Correspondence with company regarding rule 11 strategy (.3).	0.30	349.50
08/11/25	PT	Review and suggest response to amended Midas Green claims (.4); correspondence with Chambers and E. Brannen regarding rescheduling hearing (.6).	1.00	1,945.00
08/12/25	RH9	Draft notice of rescheduled hearing regarding Midas Claims (.4).	0.40	466.00
08/12/25	PT	Coordinate reset hearing date with E. Brannen and Chambers and correspondence regarding briefing	1.50	2,917.50

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		schedule (.9); correspondence with E. Brannen regarding timing for sanctions motion (.2); review and suggest revisions to letter to Midas counsel (.3); coordinate hearing date notice (.1).		
08/13/25	RH9	Review Midas opposition papers (.5); legal research into related issues (4.4); call with the Stris & Maher team to plan replies (.8); draft estimation reply (2.5).	8.20	9,553.00
08/13/25	BH2	Draft Notice of Rescheduled Hearing regarding Midas Green Technology's claims (.3); and file same (.3).	0.60	393.00
08/13/25	AJ4	Correspond with M. Rochman regarding telephone conference on Liquid Mining's claims (0.1).	0.10	156.00
08/15/25	RH9	Legal research in support of the Reply to Midas's estimation motion (5.8).	5.80	6,757.00
08/15/25	PT	Prepare for (.3) and telephone call with Alain Jaquet, Matthew Rochman, Michael Lessne to discuss claim objection (.3).	0.60	1,167.00
08/15/25	AJ4	Attend telephone conference with P. Tomasco, M. Rochman, and M. Lessne regarding Liquid Mining's claims (0.3).	0.30	468.00
08/18/25	PT	Coordinate the requesting of the withdrawal of claims by satisfied claim holders with A. Jaquet (.3).	0.30	583.50
08/18/25	RH9	Draft reply to estimation motion (9.3).	9.30	10,834.50
08/18/25	AJ4	Review and revise memorandum regarding status of claim objections (1.8); correspond with P. Tomasco, A. Popescu and F. Sabzevari regarding same (2.2).	4.00	6,240.00
08/19/25	PT	Review and extensive revisions to the reply to the response to the motion to	3.10	6,029.50

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		estimate and claim objection (2.9) and email same and comments to E. Brannen and R. Harrington (.2).		
08/19/25	BH2	Work with attorneys to finalize (4.1) and file the Reply in Support of Summary Judgment Motion in Support of Amended Omnibus Objection to Claims filed by Midas Green Technologies and the Reply in Support of Motion to Estimate Contingent and Unliquidated Claims of Midas Green Technologies (.4); serve both to J Thomas (.2); distribute same to the Client (.1).	4.80	3,144.00
08/19/25	RH9	Revisions to Midas estimation reply (4.8); proof reply (.5).	5.30	6,174.50
08/19/25	AJ4	Correspond with claimants Stadlin, Spencer, Garrie and Thurman regarding satisfaction of claims (1.0).	1.00	1,560.00
08/20/25	LMW	Legal research re: plan treatment for SAFE claims (4.7).	4.70	7,825.50
08/20/25	AJ4	Correspond with M. Garrie in connection with the withdrawal of the claim (.2).	0.20	312.00
08/20/25	AJ4	Correspond with A. Carson regarding Stadlin's withdrawal of claims (0.1).	0.10	156.00
08/21/25	LMW	Legal research re: direct standing for bankruptcy claims (1.2).	1.20	1,998.00
08/22/25	LMW	Legal research re: treatment of impaired claims under chapter 11 (1.2).	1.20	1,998.00
08/25/25	LMW	Call with Quinn Emanuel team re: case updates (.5); legal research re: objections to the SAFEs claims (3.3); prepare summary of same (.7); legal research re: direct and derivative standing issues (4.6).	9.10	15,151.50

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08/25/25	AJ4	Correspond with R. Spencer regarding withdrawal of claim (0.2).	0.20	312.00
08/26/25	PT	Call with A Jaquet and G. Graham regarding claim objection and request for extension (.5).	0.50	972.50
08/26/25	AJ4	Correspond with S. Thurman regarding omnibus objection (0.2).	0.20	312.00
08/26/25	AJ4	Prepare for and attend telephone conference with G. Graham regarding omnibus claim objection (0.4).	0.40	624.00
08/27/25	AJ4	Correspond with G. Graham regarding extension of time to respond to claim objection and possible settlement of claims (0.5); correspond with P. Tomasco in connection with the same (0.4).	0.90	1,404.00
08/27/25	PT	Correspond with M. Rochman regarding claim withdrawal stipulation (.2); review and revise proposed claim withdrawal stipulation (.2); correspondence with G. Graham regarding request for answer extension after research of claim parameters (.7); correspond with A. Jaquet regarding same (.2); suggest additional revisions to G. Graham correspondence (.6).	1.90	3,695.50
08/27/25	PT	Conference call regarding options and strategy for claims against 3-way (.4).	0.40	778.00
08/28/25	PT	Revise proposed claim withdrawal stipulation with M. Rochman (.5); correspond with G. Graham regarding extension to respond to claim objection (.2); review and analysis of court ruling on evidence from claim objection hearing (.4); review and comment on filing by Midas Green (.3).	1.40	2,723.00

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08/29/25	BR4	Review and revise committee motion (2.3); research and emails regarding same (1.3); review response to claim objection (0.2).	3.80	5,928.00
08/29/25	PT	Respond to request for extension of time from G. Parikh (.1); coordinate filing of withdrawal stipulation (.2); review and comment on SAFE AHG response to omnibus claim objection (.2).	0.50	972.50
08/29/25	LMW	Review SAFE response to claim objection (.6); emails with Quinn Emanuel team re: court decision (.2).	0.80	1,332.00
08/29/25	AJ4	Review SAFE's limited response to omnibus claim objection (0.2); correspond with P. Tomasco and L. Maseti regarding same (0.1).	0.30	468.00
08/29/25	AJ4	Review proposed order regarding withdrawal of claims (.1); correspond with P. Tomasco in connection with same (.2); correspond with M. Rochman in connection with the same (0.1).	0.40	624.00
08/29/25	AJ4	Correspond with G. Parikh regarding extension to respond to claim objection (0.2).	0.20	312.00
08/29/25	RH9	Draft sanctions motion (1.5).	1.50	1,747.50
08/30/25	PT	Review and analyze memorandum opinion on claim objection (.5); correspondence with T. Schmeltz regarding allocation research (.2).	0.70	1,361.50
08/30/25	LMW	Review of decision re: SAFE objection (1.8).	1.80	2,997.00
08/30/25	AJ4	Review memorandum opinion regarding objection to SAFE claims (0.4).	0.40	624.00
SUBTOTAL			131.80	193,373.00

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viii Corporate Governance and board Matters

08/04/25	PT	Correspondence with C. Topping regarding annual shareholders meeting and governance issues in disclosure statement draft (.3).	0.30	583.50
08/13/25	PT	Prepare for and participate in board meeting with Charles Topping, Chase Blackmon, Cameron Blackmon, Renata Szkoda, Jonas Norr, David Eaton, Spencer Wells, Kevin Hays, Michael Robinson, David Dunn, Morgan Soule, Trace Schmeltz (.9).	0.90	1,750.50
08/19/25	PT	Call to discuss director compensation with Charles Topping, Trace Schmeltz (.3).	0.30	583.50
08/20/25	PT	Rhodium Board Meeting with Charles Topping, Chase Blackmon, Cameron Blackmon, Renata Szkoda, Jonas Norr, David Eaton, Spencer Wells, Kevin Hays, Michael Robinson, David Dunn, Morgan Soule, Trace Schmeltz (1.0).	1.00	1,945.00
08/27/25	PT	Prepare for and attend board meeting (1.2).	1.20	2,334.00
SUBTOTAL			3.70	7,196.50

x Employment and Fee Applications

08/04/25	BH2	Continue to prepare the Tenth Monthly Fee Statement (3.8).	3.80	2,489.00
08/05/25	BH2	Finish draft of the Tenth Monthly Fee Statement (1.3) and forward to P. Tomasco for her review (.2).	1.50	982.50
08/05/25	PT	Review and revise tenth monthly fee statement (.7) and correspondence with B. Howell and E. Llanas regarding same (.2).	0.90	1,750.50

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08/06/25	BH2	File the Certificate of No Objection for Barnes & Thornburg's Third Interim Fee Application (.3).	0.30	196.50
08/13/25	BH2	File the Third Interim Fee Application of Province, the Tenth Monthly Fee Statement of Province, and the Certificate of No Objection for BDO's Third Interim Fee Application (.6); begin to prepare the July monthly fee statement (1.4).	2.00	1,310.00
08/15/25	PT	Correspond with C. Topping regarding status of Keller Williams retention and sale of Twins property (.2); correspondence with B. Howell to update retention pleading (.2).	0.40	778.00
08/15/25	BH2	Continue to prepare the Rhodium monthly fee statement (3.2).	3.20	2,096.00
08/18/25	BH2	Continue to prepare the July monthly fee statement (.6).	0.60	393.00
08/19/25	BH2	File the Eleventh Monthly Fee Statement on behalf of Stris & Maher (.3).	0.30	196.50
08/21/25	BH2	Finalize (.2) and file the June Monthly Fee Statement (.3); distribute to the parties pursuant to the Interim Compensation Order (.2).	0.70	458.50
08/28/25	BH2	Continue to prepare the July Monthly Fee Statement (1.3).	1.30	851.50
08/29/25	BH2	File monthly fee statements on behalf of Province and Barnes & Thornburg (.6).	0.60	393.00
SUBTOTAL			15.60	11,895.00

xii Litigation

08/04/25	PT	Correspond with AJ Merton regarding tax litigation strategy (.2); prepare for and participate in status	1.30	2,528.50
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		conference instigated by SAFE AHG regarding discovery (.9); correspondence regarding complaint against Trine Mining draft (.2).		
08/07/25	PT	Review and comment on Lehotsky, Keller, Cohn 2004 exam notices (.4) and conference with C. Topping and Barnes & Thornburg team regarding same and prior emails with J. Wolfshohl (.4).	0.80	1,556.00
08/14/25	PT	Review and comment on motion to quash 2004 filed by Lehotsky Keller Cohn (.8); research regarding applicable disclosure rules and concepts and forward to C. Topping regarding same (.8).	1.60	3,112.00
08/17/25	PT	Call to discuss D. Proman threatening email with Trace Schmeltz, David Dunn, Michael Robinson, Spencer Wells, David Eaton, Kenneth Kansa (.8); gather prior work product from similar situations (.4); redraft response letter to M. Hurley incorporating cease and desist language and background research regarding represented parties rule for inclusion in letter (1.1).	2.30	4,473.50
08/18/25	PT	Research sample special committee letters campaign (.5); review and comment on letter to M. Hurley (.3).	0.80	1,556.00
		SUBTOTAL	6.80	13,226.00

xiv Plan and Disclosure Statement

07/21/25	LMW	Review cases re: discovery and plan confirmation (2.4).	2.40	3,996.00
07/22/25	LMW	Emails to R. Izakelian re: production of documents for confirmation hearing (.2).	0.20	333.00

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08/05/25	PT	Prepare for and participate in call to discuss waterfall analysis and preparation with Charlotte Underwood, Andrew Popescu, He Nig, Trace Schmeltz; Michael Robinson, Chris Wheeler, Paige Lohse (1.2) research regarding additional points regarding limits of subordination, lack of equitable disallowance; and double dipping and forward revisions including research to C. Underwood (1.4); additional revisions to waterfall presentation (.7).	3.30	6,418.50
08/06/25	PT	Review and revise power point presentation (1.1) and correspondence with Barnes & Thornburg Team regarding reason for changes (.1).	1.20	2,334.00
08/07/25	PT	Meeting with Trace Schmeltz, Michael Robinson, Andrew Popescu, Razmig Izakelian, David Dunn, regarding presentation to plan parties regarding updated waterfall and related background research (1.2); telephone conference with M. Fox regarding waterfall issues (.2); additional revisions to presentation (.4).	1.80	3,501.00
08/08/25	PT	Prepare for and participate in waterfall presentation with Charlotte Underwood, Mitchell Hurley, Michael Robinson, Amber M. Carson, Thomas Fleming, Brenda Funk, Trace Schmeltz, Carl N. Kunz III, Michael Fox, Sarah Schultz, Jason Brookner, Andrew Popescu, Paige Lohse, Ning He, Katie Matsoukas, Kenneth Kansa, Chris Wheeler, Razmig Izakelian (1.4); follow up conferences with M. Robinson and E. Winston regarding next steps (.3).	1.70	3,306.50

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08/11/25	PT	Prepare for and participate in conference with Andrew Popescu, He Ning, Trace Schmeltz, Charlotte Underwood, Kenneth Kansa, Michael Robinson, David Dunn regarding revised cash reconciliation (1.1); review and analyze discovery requests from M. Hurley and draft email correspondence requiring withdrawal (1.3).	2.40	4,668.00
08/12/25	LMW	Review updated liquidation analysis (.8); emails with P. Tomasco re: liquidation of entities (.6); legal research re: same (2.1); review of emails re: tax treatment for same (.4); emails with Quinn Emanuel team re: Celsius review (.2).	4.10	6,826.50
08/12/25	PT	Prepare for and attend conference call to discuss tax allocation and tax planning with Andrew Popescu, Chris Wheeler, Michael Robinson, Kevin Hays, Ashley Jonson, Alex Peloubet, Trace Schmeltz (1.1).	1.10	2,139.50
08/12/25	BR4	Research related to plan provisions (1.4).	1.40	2,184.00
08/13/25	BR4	Call with Asset Purchase Agreement parties and SAFE AHG regarding waterfall (2.3).	2.30	3,588.00
08/13/25	LMW	Prepare analysis of potential plan objections (1.0).	1.00	1,665.00
08/13/25	PT	Conference with interested parties to discuss waterfall calculations with Charlotte Underwood, Trace Schmeltz, Brenda Funk, Michael Robinson, Mitchell Hurley, Jason Brooker, Michael Stanley, Michael Fox, Elizabeth Scott, Thomas Fleming, Carl Kunz, Sarah Schultz, Nathaniel Allard, Grayson Williams, Amber M. Carson, Andrew Popescu, Chris Wheeler (1.1).	1.10	2,139.50

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08/13/25	PT	Participate in update call regarding plan negotiations with Charlotte Underwood, Spencer Wells, David Dunn, Michael Robinson, Ning He (.7).	0.70	1,361.50
08/14/25	BR4	Research on tax obligations (.1).	0.10	156.00
08/14/25	PT	Conference with Charlotte Underwood, Trace Schmeltz regarding settlement discussions (.7).	0.70	1,361.50
08/15/25	PT	Correspondence (multiple) with C. Wheeler regarding analysis of tax outcomes for plan settlement (1.1).	1.10	2,139.50
08/20/25	PT	Strategy meeting with Trace Schmeltz, David Eaton, Spencer Wells, David Dunn, Michael Robinson (.9); research burdens of proof for confirmation items (.4); research various confirmation issues and follow up emails with D. Eaton regarding same (1.9); correspond with Quinn Emanuel team regarding potential alternative plan structures (.2).	3.40	6,613.00
08/21/25	PT	Strategy call with David Dunn, Spencer Wells, David Dunn, Trace Schmeltz, Michael Robinson (.6); follow up research on investment dates, standing and damages allocation under Delaware law and pre-merger allocations of damages and correspond with C. Sangree and G. Phillips regarding prior research results (3.1).	3.70	7,196.50
08/22/25	RH9	Legal research into confirmation requirements (2.9).	2.90	3,378.50
08/22/25	PT	Review roll-up timeline and research regarding allocation of damages based on disclosures and timing; follow up correspondence with	3.60	7,002.00

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		Delaware associates regarding prior research and review cases (3.6).		
08/24/25	PT	Review and comment on emergency request for status conference (.8).	0.80	1,556.00
08/25/25	BR4	Review pleadings related to emergence status conference and termination request (1.5).	1.50	2,340.00
08/25/25	PT	Review waterfall analysis and suggest revisions based on revised tax analysis (.5); emails with associate team regarding allocation of settlement proceeds under Delaware law and scenarios suggested by cases pre and post merger or rollup and ongoing research regarding confirmation/allocation issues raised by timeline of settlement conduct (3.1); correspond with R. Harrington regarding response to AHG status conference motion (.4); review and comment on BT outline for response (.5); prepare for and participate in conference with special committee and CROs regarding response to status conference motion (.9); correspondence with N. He regarding analysis of ownership of officer and director claims (.8); further analysis of Delaware cases on ownership of settlement with associate team and review salient cases for additional analysis (.4); follow up on response to status conference motion (.2); review and analyze SAFE plan comparison (.4); coordinate incorporation into response to SAFE AHG (.1); prepare for and participate in tax allocation analysis for plan and sales processes (1.1).	8.40	16,338.00
08/25/25	RH9	Draft response to termination motion (7.1).	7.10	8,271.50

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08/26/25	NM7	Conference call with R. Harrington re SAFE AHG Emergency Motion for Status Conference (0.1); review SAFE AHG Emergency Motion and Debtors' draft response re same (0.5); research case law re exclusivity period and creditor violation of exclusivity period (1.4).	2.00	2,070.00
08/26/25	LMW	Legal research re: distribution of non-estate property (3.7); legal research re: gifting under chapter 11 plan (3.8).	7.50	12,487.50
08/26/25	PT	Review and revise response to status conference motion (1.6); online research regarding direct but common claims under plan confirmation standards (2.2); review and revise response to status conference motion (1.2); correspond with T. Schmeltz regarding same (.2).	5.20	10,114.00
08/26/25	RH9	Draft response to termination motion (9.7).	9.70	11,300.50
08/27/25	LMW	Review and revise exclusivity objection (1.2); review analysis re: SAFE plan proposals (.8); prepare responses to same (3.2).	5.20	8,658.00
08/27/25	PT	Coordinate additional edits to response to status conference motion (.3); review and revise response (.9); correspondence with D. Dunn regarding exclusivity points (.4).	1.60	3,112.00
08/28/25	PT	Call with special committee to review settlement plan options and strategy (.6); follow-up conference with D. Eaton regarding same (.3).	0.90	1,750.50
08/29/25	PT	Correspond with D. Eaton regarding proceeds allocation fairness question and additional analysis of same (.8).	0.80	1,556.00
08/29/25	PT	Debrief call with T. Schmeltz and special committee regarding settlement call with SAFE AHG (.8);	2.60	5,057.00

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follow up with T. Schmeltz regarding research on standing/proceeds allocation of settlement and ongoing analysis of corporate structure (.3); summarize research results with D. Eaton (.4); review and revise response to status conference motion and circulate revisions (1.1).

SUBTOTAL 93.50 156,919.00

xv Relief from Stay and Adequate Protection

08/16/25	PT	Correspondence with T. Schmeltz regarding insurance proceeds and lift stay motion (.6).	0.60	1,167.00
08/26/25	BR4	Call with R. Harrington regarding SAFE AHG motion (0.7); research and emails related to same (0.7).	1.40	2,184.00
08/27/25	BR4	Review and revise response to SAFE motion (2.0); emails regarding same (0.3).	2.30	3,588.00
08/28/25	PT	Prepare for (.8) and attend hearing on Imperium motion for relief from stay and research cases relating to same (.3).	1.10	2,139.50
08/28/25	LMW	Review response briefing re: termination of the automatic stay (1.4).	1.40	2,331.00
SUBTOTAL			6.80	11,409.50

Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
Eric D. Winston	EDW	Partner	1.10	1,990.00	2,189.00
Patty Tomasco	PT	Partner	101.50	1,945.00	197,417.50
Lindsay M. Weber	LMW	Associate	104.10	1,665.00	173,326.50
Razmig Izakelian	RI	Associate	5.20	1,665.00	8,658.00
Ben Roth	BR4	Associate	28.50	1,560.00	44,460.00
Alain Jaquet	AJ4	Associate	41.10	1,560.00	64,116.00

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Rachel Harrington	RH9	Associate	67.60	1,165.00	78,754.00
Nqulielwa Maseti	NM7	Associate	25.70	1,035.00	26,599.50
Case Assistants	Init.	Title	Hours	Rate	Amount
Barbara J Howell	BH2	Paralegal	25.60	655.00	16,768.00

Expense Summary

Description	Amount
Hearing transcript(s)	31.05
Online Research	(based on standard Westlaw or Lexis, without any applicable discount) 0.00
Word processing	0.00

Litigation Support Costs

RelOne User Fee	0.00
RelOne Repository Hosting (Per GB)	1,479.14
RelOne Active Hosting (Per GB)	4,305.29
Total Expenses	\$5,815.48