

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

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

**BARNES & THORNBURG LLP’S FIFTEENTH MONTHLY  
FEE STATEMENT FOR THE PERIOD  
NOVEMBER 1, 2025, THROUGH NOVEMBER 30, 2025**

Barnes & Thornburg LLP (“B&T”) 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 from November 1, 2025, through November 30, 2025, inclusive (the “Fifteenth Monthly Fee Statement”).

B&T seeks payment of interim compensation in the total amount of \$330,172.00 (80% of the services rendered), plus \$53,667.52 (100% of the interim expenses incurred). Summaries of the fees and expenses are attached hereto as Exhibits A and B. An invoice reflecting detailed time entries is attached hereto as Exhibit C.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses will have 14 days after service of the Fifteenth

<sup>1</sup> 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.



Monthly Fee Statement to serve a written notice, via email, upon B&T and each of the other Fee Notice Parties (as listed below) (the “Notice of Objection to Monthly Statement”). The Notice of Objection to Monthly Statement shall set forth with reasonable detail the nature of the objection and the amount at issue. If the parties are unable to reach a resolution of the objection within 14 days of serving the Notice of Objection to Monthly Statement, the objecting party shall file its objection (the “Objection”) with this Court within three business days and serve such Objection on B&T and each of the other Fee Notice Parties. *See* Interim Compensation Order, ¶ 1(b).

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

Rhodium Enterprises, Inc.

Attn: Charles Topping ([chucktopping@rhdm.com](mailto:chucktopping@rhdm.com))

and Morgan Soule ([morgansoule@rhdm.com](mailto:morgansoule@rhdm.com))

2617 Bissonnet Street, Suite 234

Houston, Texas 77005

Debtors’ Bankruptcy Counsel, c/o Quinn Emanuel Urquhart & Sullivan, LLP

Attn: Patricia B. Tomasco ([pattytomasco@quinnemanuel.com](mailto:pattytomasco@quinnemanuel.com));

Razmig Izakelian ([razmigizakelian@quinnemanuel.com](mailto:razmigizakelian@quinnemanuel.com)),

Alain Jaquet ([alainjaquet@quinnemanuel.com](mailto:alainjaquet@quinnemanuel.com)),

and Joanna D. Caytas ([joannacaytas@quinnemanuel.com](mailto:joannacaytas@quinnemanuel.com)),

700 Louisiana, Suite 3900,

Houston, Texas 77002

Debtors’ Financial Advisor, c/o Province

Attn: Mark Robinson ([mrobinson@provincefirm.com](mailto:mrobinson@provincefirm.com));

David Dunn ([ddunn@provincefirm.com](mailto:ddunn@provincefirm.com));

Kirsten Lee ([klee@province.com](mailto:klee@province.com));

and Andrew Popescu ([apopescu@provincefirm.com](mailto:apopescu@provincefirm.com)),

2360 Corporate Circle, Suite 340,

Henderson, Nevada 89074

Galaxy Digital, LLC, in its capacity as DIP Agent, c/o Orrick, Herrington & Sutcliffe LLP,

Ryan C. Wooten ([rwooten@orrick.com](mailto:rwooten@orrick.com))

609 Main, 40<sup>th</sup> Floor

Houston, Texas 77002

and Robert Trust ([rtrust@orrick.com](mailto:rtrust@orrick.com))

Mark Franke ([mfranke@orrick.com](mailto:mfranke@orrick.com))

and Brandon Batzel ([bbatzel@orrick.com](mailto:bbatzel@orrick.com))

51 West 52<sup>nd</sup> Street

New York, New York 10019

Counsel or proposed counsel to any statutory committee appointed in these Chapter 11 Cases

and

United States Trustee,  
Ha Minh Nguyen ([ha.nguyen@usdoj.gov](mailto: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 B&T 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 30th day of December 2025.

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

/s/ Patricia B. Tomasco  
Patricia B. Tomasco (SBN 01797600)  
Cameron Kelly (SBN 24120936)  
Alan Jaquet (*pro hac vice*)  
700 Louisiana, Suite 3900  
Houston, Texas 77002  
Telephone: 713-221-7000  
Facsimile: 713-221-7100  
Email: [pattytomasco@quinnemanuel.com](mailto:pattytomasco@quinnemanuel.com)  
Email: [cameronkelly@quinnemanuel.com](mailto:cameronkelly@quinnemanuel.com)  
Email: [alainjaquet@quinnemanuel.com](mailto:alainjaquet@quinnemanuel.com)

-and-

Eric Winston (*pro hac vice*)  
Razmig Izakelian (*pro hac vice*)  
865 S. Figueroa Street, 10<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: 213-443-3000  
Facsimile: 213-443-3100  
Email: [ericwinston@quinnemanuel.com](mailto:ericwinston@quinnemanuel.com)  
Email: [razmigizakelian@quinnemanuel.com](mailto:razmigizakelian@quinnemanuel.com)

*Counsel to the Debtors and Debtors-in-Possession*

BARNES & THORNBURG LLP

/s/ Trace Schmeltz

Vincent P. (Trace) Schmeltz III

Kenneth Kansa

Aaron Gavant

One N. Wacker Drive, Suite 4400

Chicago, Illinois 60606-2833

Telephone: 312-214-4830

Facsimile: 312-759-5646

Email: [Trace.Schmeltz@btlaw.com](mailto:Trace.Schmeltz@btlaw.com)

Email: [KKansa@btlaw.com](mailto:KKansa@btlaw.com)

Email: [AGavant@btlaw.com](mailto:AGavant@btlaw.com)

*Counsel to the Special Committee of Rhodium  
Enterprises, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on December 30, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

**Patricia B. Tomasco**

*/s/ Patricia B. Tomasco* \_\_\_\_\_

**EXHIBIT A****Summary of Hours Billed by Barnes & Thornburg Attorneys and Paraprofessionals**

<b>Professional</b>	<b>Position With the Applicant</b>	<b>Year Admitted</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Trace (Vincent P.) Schmeltz	Partner	1997	Litigation	\$1,000.00	62.60	\$62,600.00
Kenneth Kansa	Partner	1999	Restructuring and Bankruptcy	\$1,205.00	63.30	\$76,276.50
Carrie M. Raver	Partner	1999	Litigation	\$950.00	1.70	\$1,615.00
Aaron Gavant	Partner	2009	Restructuring and Bankruptcy	\$905.00	0.90	\$814.50
Kathleen L. Matsoukas	Partner	2005	Litigation	\$880.00	60.10	\$52,888.00
Charlotte Underwood	Counsel	2014	Litigation	\$1,070.00	11.90	\$12,733.00
Ning He	Of Counsel	2016	Litigation	\$865.00	68.60	\$59,339.00
Paige (Catherine) Lohse	Partner	2015	Litigation	\$720.00	58.80	\$42,336.00
Leah O'Farrell	Associate	2021	Restructuring and Bankruptcy	\$665.00	34.80	\$23,142.00
Haley Casper	Associate	2021	Litigation	\$590.00	16.40	\$9,676.00
Anna Bninski	Associate	2023	Litigation	\$505.00	18.10	\$9,140.50
Kevin Warren	Associate	2024	Litigation	\$485.00	40.60	\$19,691.00
Joseph Kipp	Associate Pending Bar Admission	N/A	Litigation	\$485.00	12.90	\$6,256.50
Anita Peterson	Paralegal	N/A	Litigation	\$405.00	89.40	\$36,207.00
<b>Total</b>					<b>540.10</b>	<b>\$412,715.00</b>

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

<b>Date</b>	<b>Expense</b>	<b>Amount</b>
10/29/2025	American Express – K. Warren Airfare DCA AUS 10/28/2025 INV144441	(\$919.48)
10/29/2025	American Express – K. Warren Airfare BWI AUS 10/28/2025 INV144873	\$673.48
10/29/2025	American Express – T. Schmeltz Airfare BWI AUS 10/28/2025 INV144889	\$673.48
10/30/2025	American Express – C. Topping Hyatt Place Austin Downtown, INV144509	\$485.26
10/30/2025	American Express – K. Matsoukas Airfare Fees IND IAH IND INV145287	\$35.00
10/30/2025	American Express – T. Schmeltz Airfare AUS IAH ORD 10/30/2025 INV145314	\$892.01
10/30/2025	American Express – K. Warren Airfare AUS MDW 10/29/2025 INV145104	\$515.48
10/30/2025	American Express – K. Matsoukas Airfare IND IAH IND 11/2/2025 – 11/4/2025 INV145287	\$1,038.63
11/01/2025	American Express – K. Warren Airfare Fees ORD IAH ORD 11/2/2025 – 11/5/2025 INV146040	\$39.76
11/01/2025	American Express – K. Warren Airfare ORD IAH ORD 11/2/2025 – 11/5/2025 INV146040	\$967.20
11/03/2025	Westlaw – Computerized Legal Research	\$404.93
11/03/2025	Copy Services – Jenn S Copy & Binding 10/29/2025	\$384.29
11/04/2025	Copying Charges	\$134.55
11/04/2025	FedEx Inv#905833645	\$111.35
11/04/2025	FedEx Inv#905833645	\$143.80
11/04/2025	FedEx Inv#905833645	\$100.29
11/05/2025	Copying Charges	\$110.10
11/05/2025	Copying Charges	\$76.50
11/05/2025	American Express – D. Eaton Lodging Lancaster Hotel Houston Texas INVCONF# 590120786	\$1,639.53
11/05/2025	Veritext LLC – Original Transcript of Jonathan Cohn Inv Number: 8758350 10/31/2025	\$8,929.22
11/06/2025	T. Schmeltz Uber to Hyatt Place 10/29/2025	\$43.28
11/06/2025	T. Schmeltz Uber from Airport to Moxy Houston Downtown 10/30/2025	\$65.45
11/06/2025	T. Schmeltz Uber from Hotel to Airport 10/30/2025	\$46.12
11/06/2025	T. Schmeltz Parking at O'Hare International Airport 10/26/2025 – 10/30/2025	\$252.00
11/06/2025	T. Schmeltz Hyatt Place Austin Texas 10/28/2025 – 10/30/2025	\$927.30
11/07/2025	K. Warren Taxi/Car Service 11/03/2025	\$43.16
11/07/2025	K. Warren Taxi/Car Service 11/04/2025	\$58.99
11/07/2025	K. Warren Taxi/Car Service 10/29/2025	\$36.02

11/07/2025	K. Warren Taxi/Car Service 10/20/2025	\$127.26
11/07/2025	K. Warren Taxi/Car Service 10/23/2025	\$67.97
11/07/2025	K. Warren Taxi/Car Service 10/27/2025	\$82.72
11/07/2025	K. Warren Lodging 10/27/2025 – 10/28/2025	\$601.79
11/07/2025	Conference Room 1008 11/01/2025 – 11/05/2025	\$1,848.72
11/07/2025	Office Depot Color Copies 11/03/2025	\$34.94
11/07/2025	Office Depot Hearing Supplies 11/03/2025	\$206.21
11/10/2025	Planet Depos LLC – Transcript of Mike Rosten Inv Number: 799819 11/03/2025	\$3,256.05
11/10/2025	Parking Validations for Deposition Inv Number: INV06704247 11/03/2025	\$40.00
11/11/2025	Westlaw – Computerized Legal Research	\$6,472.63
11/11/2025	K. Matsoukas Uber from Airport to Hotel 11/02/2025	\$63.00
11/11/2025	K. Matsoukas Airport Parking 11/04/2025	\$116.00
11/11/2025	K. Matsoukas Uber from Hotel to Airport 11/04/2025	\$65.89
11/11/2025	T. Schmeltz Uber from Airport to Dinner 10/27/2025	\$73.90
11/11/2025	T. Schmeltz Airfare ORD DCA 10/26/2025	\$708.48
11/11/2025	K. Matsoukas Lodging 11/02/2025 - 11/04/2025	\$608.64
11/12/2025	FedEx Inv#907659966	\$29.79
11/12/2025	Mastercard – C. Blackmon Lancaster Hotel Parking 11/03/2025	\$125.58
11/12/2025	The Document Group Inc Printing Inv Number: 2110433 10/31/2025	\$4,197.77
11/13/2025	Veritext LLC – Sealed Complete Transcript Inv Number: 8776097 11/07/2025	\$327.70
11/13/2025	T. Schmeltz Lodging JW Marriott Washington D.C. 10/27/2025 10/28/2025	\$680.63
11/14/2025	T. Schmeltz Uber from Airport to Hotel 11/02/2025	\$51.52
11/14/2025	T. Schmeltz Uber from Dinner to Hotel 11/02/2025	\$45.78
11/14/2025	T. Schmeltz Uber from Hotel to Dinner 11/02/2025	\$44.57
11/14/2025	T. Schmeltz Uber to Airport 11/02/2025	\$93.98
11/14/2025	US Messenger & Logistics Inc Courier Services Inv Number: 2511 53726 10/31/2025	\$74.33
11/14/2025	T. Schmeltz Airfare IND IAH 11/04/2025	\$1,411.18
11/14/2025	T. Schmeltz Lodging Lancaster Hotel 11/02/2025 – 11/05/2025	\$1,997.19
11/18/2025	Mastercard – C. Blackmon Lodging Lancaster Hotel 11/02/2025 – 11/05/2025	\$986.67
11/18/2025	Mastercard – C. Wheeler Lodging Lancaster Hotel 11/02/2025 – 11/05/2025	\$986.67
11/18/2025	Mastercard – C. Topping Lodging Lancaster Hotel 11/02/2025 – 11/05/2025	\$986.67
11/19/2025	Color Copies	\$118.50
11/24/2025	K. Kansa Uber from Court to Airport 10/16/2025	\$127.05
11/24/2025	K. Kansa Uber from Airport to Court 10/15/2025	\$140.64

11/24/2025	K. Kansa Parking 10/16/2025	\$43.00
11/24/2025	FedEx Inv#908491843	\$62.80
11/24/2025	FedEx Inv#908491843	\$91.59
11/24/2025	FedEx Inv#908491843	\$79.08
11/24/2025	FedEx Inv#908491843	\$69.30
11/24/2025	FedEx Inv#908491843	\$95.37
11/24/2025	FedEx Inv#908491843	\$62.80
11/24/2025	FedEx Inv#908491843	\$95.37
11/24/2025	K. Kansa Airfare to Houston Texas 10/13/2025	\$996.96
11/25/2025	Office Supplies for Hearing 11/21/2025	\$22.63
11/25/2025	E-Filing Court Documents	\$50.00
11/30/2025	Veritext LLC – Fees for videographer re: Jonathan Cohn Inv Number: 8825923 11/26/2025	\$3,310.50
11/30/2025	Everlaw Inc – Professional Services; Active Review – eDiscovery Hosting Services Subscription Fees	\$2,548.00
11/30/2025	Everlaw Inc – Professional Services; Early Case Assessment – eDiscovery Hosting Services Subscription Fees	\$1,432.00
<b>Total</b>		<b>\$53,667.52</b>

**BARNES & THORNBURG** LLP

One North Wacker Drive, Suite 4400  
Chicago, Illinois 60606 U.S.A.  
E.I.N. 35-0900596  
(312) 357-1313

Invoice 3517153

SPECIAL COMMITTEE OF THE BOARD OF  
DIRECTORS OF RHODIUM  
DAVID EATON  
251 LITTLE FALLS DRIVE  
WILMINGTON, DE 19808  
DAVIDEATON@RHDM.COM

December 29, 2025  
Trace (Vincent P.) Schmeltz  
00101065-00000001

PAYABLE UPON RECEIPT

Fees for Services	\$	412,715.00
Other Charges	\$	53,667.52
<b>Total This Invoice</b>	<b>\$</b>	<b>466,382.52</b>

REMITTANCE

**To remit payments by check, please return this page with remittance to:**  
Barnes & Thornburg LLP, 11 South Meridian Street, Indianapolis, Indiana 46204-3535 U.S.A.

**To remit payments by ACH or Wire, send remittance advice to [wireconfirmations@btlaw.com](mailto:wireconfirmations@btlaw.com) Send payment to:**  
Fifth Third Bank, Indianapolis, IN, Account Number: 7653510706 SWIFT CODE: FTBCUS3C  
ABA #074908594 for ACH ABA #042000314 for Wires

**We do not communicate changes to our bank account details by email. If you receive such a request, please call our office using a verified number before taking any action.**

**BARNES & THORNBURG** LLP

One North Wacker Drive, Suite 4400  
Chicago, Illinois 60606 U.S.A.  
E.I.N. 35-0900596  
(312) 357-1313

SPECIAL COMMITTEE OF THE BOARD OF  
DIRECTORS OF RHODIUM  
DAVID EATON  
251 LITTLE FALLS DRIVE  
WILMINGTON, DE 19808  
DAVIDEATON@RHDM.COM

Invoice 3517153

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December 29, 2025  
Trace (Vincent P.) Schmeltz  
00101065-00000001

PAYABLE UPON RECEIPT

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**00101065-00000001**

**FIDUCIARY DUTY INVESTIGATION**

For legal services rendered in connection with the above matter for the period ending November 30, 2025 as described on the attached detail.

Fees for Services	\$	412,715.00
Other Charges	\$	<u>53,667.52</u>
<b>Total This Invoice</b>	<b>\$</b>	<b>466,382.52</b>

00101065-00000001 SPECIAL COMMITTEE OF THE BOARD OF  
DIRECTORS OF RHODIUM

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## FIDUCIARY DUTY INVESTIGATION

**Summary of Invoice**

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
11/01/25	Charlotte Underwood	Prepare for Monday contested hearing.	0.40	428.00
11/01/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-11-03 hearing including logistics (3.2); communications with C. Topping forwarding rough draft transcript from 2025-10-31 deposition of M. Rosten (BDO) (.2); communications with BDO forwarding rough draft transcript from 2025-10-31 deposition of M. Rosten (BDO) (.2); review communications with C. Topping regarding M. Rosten deposition exhibits and assist attorneys in executing strategy per request of N. He (.2); communications with K. Matsoukas and N. He regarding M. Rosten deposition transcript, errata sheet (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); assist attorneys in executing strategy per request of T. Schmeltz focusing on depositions (.2); communications with C. Topping regarding deposition transcripts and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with Porter Hedges regarding hearing exhibits (.1); review communications with C. Topping regarding 2025-11-03 hearing (.1); review communications with LKC regarding M. Rosten deposition (.2); review communications with P. Tomasco regarding Quinn Emanuel document production to Transcend (.2).	5.40	2,187.00
11/01/25	Anita Peterson	Review communications with Porter Hedges forwarding 2025-11-01 (Dkt 1927) SEALED Special Committee's Emergency Motion to Limit Evidence Relied Upon by LKC, 2025-11-01 (Dkt 1928 ) SEALED Declaration of Vincent (Trace) Schmeltz, with sealed exhibits C-J and assist attorneys in executing strategy per request of P. Lohse (.8); review communications with C.	2.80	1,134.00

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DIRECTORS OF RHODIUM

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## FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Potter regarding deposition of M. Robinson and assist attorneys in executing strategy per request of C. Underwood (.2); review communication with P. Tomasco regarding Transcend's requests for production of documents (.1); communications with investigation team regarding declarations for 2025-11-03 hearing (.2); review communications with C. Topping forwarding final transcripts and exhibits from 2025-10-31 deposition of M. Rosten (.2); review communication with C. Topping forwarding 2025-11-01 (Dkt 1927) SEALED Special Committee's Emergency Motion to Limit Evidence Relied Upon by LKC, 2025-11-01 (Dkt 1928 ) SEALED Declaration of Vincent (Trace) Schmeltz, with sealed exhibits C-J (.2); review as-filed 2025-11-01 (Dkt 1931) SEALED Special Committee's First Set of Requests for Production of Documents to LKC and assist attorneys in executing strategy per request of P. Lohse (.2); review communications with M. Rosten forwarding transcripts and exhibits from 2025-10-31 deposition of M. Rosten and assist attorneys in executing strategy per request of N. He (.2); precise tracking and timely updates of deadlines and filings (.2); review communications with Porter Hedges regarding deposition of M. Rosten (.1); review communications with C. Topping regarding Building D and assist attorneys in executing strategy per request of N. He (.2); review communication with M. Rosten regarding deposition and assist attorneys in executing strategy per request of N. He (.2).		
11/01/25	Kathleen L. Matsoukas	Participate in strategy call with T. Schmeltz and N. He regarding expert testimony (1.0); work with N. He on final motion to preclude LKC from using evidence (.5); work with N. He on strategy for M. Rosten expert testimony (.8); prepare for and participate in meet and confer call regarding Transcend discovery (.8); review M. Rosten deposition transcript (1.1); strategize regarding LKC request for additional expert	6.00	5,280.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		documents and communicate with LKC regarding same (1.3); review research related to expert discovery in bankruptcy (.5).		
11/01/25	Kenneth Kansa	Meet-and-confer call with C. Potter and T. Schmeltz regarding fee dispute (.3); additional meet and confer with Transcend parties and Plan Proponents (.8); review 30(b)(6) materials (.2).	1.30	1,566.50
11/01/25	Anna Brinski	Research law regarding basis of expert opinions that is permissible in the 5th circuit (2.2); summarize same for N. He (.5).	2.70	1,363.50
11/01/25	Ning He	Prepare direct outlines for witnesses (2.5); research issues regarding motion in limine (3.5); analyze trial exhibits (1.5); revise motion to limit evidence (1.5); analyze documents regarding LKC claims (2.5); confer with BDO regarding expert testimony (1.0); analyze documents regarding damages (1.5).	14.00	12,110.00
11/01/25	Leah O'Farrell	Attention to email from T. Schmeltz regarding filing motion to strike (.1); teams messages regarding same (.1); draft proposed order and motion to seal and coordinating filing (.5).	0.70	465.50
11/01/25	Leah O'Farrell	Coordinate filing of withdrawal of misconduct claims.	0.20	133.00
11/01/25	Leah O'Farrell	Review request for production of documents related to plan (.1); email K. Matsoukas regarding same (.1).	0.20	133.00
11/01/25	Leah O'Farrell	Draft email response to request for further documents related to expert.	0.40	266.00
11/01/25	Haley Casper	Draft declaration for K. Hays in furtherance of filing in furtherance of hearing on the LKC dispute (1.2); analyze prior deposition testimony in furtherance of same (2.6); draft declaration for C. Wheeler in furtherance of filing in furtherance of same (1.0); analyze prior deposition testimony and prior filed declarations in furtherance of same (2.1).	6.90	4,071.00
11/01/25	Kevin Warren	Evaluate LKC motion in limine to exclude certain communications to prepare outline for response in opposition to assist T. Schmeltz, P. Lohse, and K. Matsoukas to prepare for hearing	1.90	921.50

00101065-00000001 SPECIAL COMMITTEE OF THE BOARD OF  
DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		on LKC fee application.		
11/01/25	Trace (Vincent P.) Schmeltz	Call with team regarding expert testimony (1.0); meet and confer with Transcend on plan discovery (.8); meet and confer with C. Potter and K. Kansa regarding fee dispute (.3).	2.10	2,100.00
11/02/25	Charlotte Underwood	Confer with client regarding plan discovery preparations (.7); confer with Quinn Emanuel regarding plan discovery (.8); plan discovery preparations including deposition prep materials and outlines (.9); support to LKC hearing team (.3).	2.70	2,889.00
11/02/25	Leah O'Farrell	Call with P. Lohse regarding pocket briefing assignments.	0.10	66.50
11/02/25	Leah O'Farrell	Draft objections to request for production of documents from Transcend.	1.50	997.50
11/02/25	Leah O'Farrell	Review objection to motion to limit evidence and strike reply.	0.40	266.00
11/02/25	Leah O'Farrell	Draft reply in support of motion to limit and strike.	1.40	931.00
11/02/25	Leah O'Farrell	Revise reply in support of motion per edits from C. Underwood (.6); email to BT team regarding same (.1).	0.70	465.50
11/02/25	Leah O'Farrell	Teams communications with P. Lohse and LKC BT Team regarding introducing declarations.	0.10	66.50
11/02/25	Leah O'Farrell	Draft notice of intent to use declarations as direct evidence.	0.40	266.00
11/02/25	Leah O'Farrell	Attention to communications regarding filing (.2); draft motion to seal documents for filing (.2).	0.40	266.00
11/02/25	Leah O'Farrell	Review of objections to plan discovery and provide revisions regarding same (.3); finalize reply for filing and email to P. Lohse regarding same (.1).	0.40	266.00
11/02/25	Charlotte Underwood	Revise motion to limit (.6); additional pre-trial support (.2).	0.80	856.00
11/02/25	Kathleen L. Matsoukas	Prepare for and participate in call with client and T. Schmeltz and C. Underwood to discuss strategy for response to Transcend 30(b)(6) topics (.8); participate in discussion with client	3.50	3,080.00

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## FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		and P. Tomasco, T. Schmeltz, and C. Underwood regarding response to Transcend discovery (.8); draft and revise objections to Transcend Rule 30(b)(6) topics and communicate with team and other counsel regarding same (1.9).		
11/02/25	Kathleen L. Matsoukas	Review deposition transcripts and exhibits in connection with outlining opening statement for LKC hearing (2.4); draft and revise slide deck for opening statement for LKC hearing (2.8); review and provide edits on response to motion to exclude settlement communications (1.5); review and provide edits on reply brief in further support of motion to limit LKC use of evidence (.4).	7.10	6,248.00
11/02/25	Paige Lohse	Preparations for hearing on LKC dispute (5.0); confer with H. Casper regarding hearing preparation (.2); confer with L. O'Farrell regarding pocket briefing assignments (.1); pre-hearing motion briefing and declarations (8.8) analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (1.1).	15.20	10,944.00
11/02/25	Anita Peterson	Assist attorneys in executing strategy per request of T. Schmeltz focusing on response to LKC's motion to exclude expert M. Rosten (.4); review communications with LKC requesting unsealed versions of recent filings (.1); communications with investigative team regarding LKC's emergency motion to strike expert M. Rosten (.4); review communications with C. Toppings regarding LKC's recent filings (.1); review communications with Akin regarding LKC's recent filings (.1); review communications with M. Rosten regarding LKC's emergency motion to strike (.2); review communications with K. Hays regarding declaration (.3); review communications with C. Topping regarding declarations (.3); review communications with C. Wheeler regarding declaration (.3); review communications with D. Eaton regarding declaration (.3); review communications with S. Eaton, S. Wells, M. Robinson, P. Tomasco	2.70	1,093.50

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## FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		regarding draft objections to Transcend Group's 30(b)(6) topics (.1); review communications with Akin regarding draft objections to Transcend Group's 30(b)(6) topics (.1).		
11/02/25	Anna Bninski	Prepare for hearing on LKC fee dispute, including legal research on expert witness exclusion, limitation of evidence, and contract interpretation (3.7); draft declarations for fee dispute (1.7); revision to same (.5).	5.90	2,979.50
11/02/25	Ning He	Prepare expert for testimony (5.5); draft response in opposition to motion to limit (7.5); draft direct outline for witnesses (2.2).	15.20	13,148.00
11/02/25	Kenneth Kansa	Email to L. O'Farrell on Transcend objection (.1); review Transcend 30(b)(6) documents and email to K. Matsoukas on same (.3); review Fourth Interim fee application revisions (.3); email to L. Parks on same (.1); review emails on D. Eaton and M. Robinson deposition prep (.2).	1.00	1,205.00
11/02/25	Haley Casper	Edit and supplement K. Hays declaration (1.4); collect and prepare K. Hays exhibits in furtherance of declaration (.4); call with P. Lohse regarding status of declarations and hearing preparation (.2); edit and supplement C. Wheeler declaration (.7); evaluate T. Schmeltz edits and comments to K. Hays and C. Wheeler declarations (.1); supplement K. Hays declaration and circulate to witness for review (.6); supplement C. Wheeler declaration and circulate to witness for review (.4); edit K. Hays declaration to incorporate K. Hays edits and comments (.6); call with K. Hays regarding same (.2); revise and recommend further edits to K. Hays declaration in light of call with witness (.7); analyze draft slides in furtherance of hearing with respect to K. Hays and C. Wheeler (.3); finalize C. Wheeler and K. Hays declarations and exhibits and circulate to file (1.6).	7.20	4,248.00
11/02/25	Kevin Warren	Draft direct examination outline of C. Blackmon to assist T. Schmeltz in preparing for hearing on LKC fee application.	4.70	2,279.50
11/02/25	Kevin Warren	Strategize approach to response in opposition	2.70	1,309.50

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		to LKC motion in limine (1.5); coordination of research relating to the same to A. Brinski to prepare for hearing on LKC fee application (1.2).		
11/02/25	Kevin Warren	Coordinate preparation of trial exhibits with A. Peterson to prepare for LKC fee application hearing.	1.50	727.50
11/02/25	Kevin Warren	Evaluate exhibits related to C. Topping for direct examination at LKC fee application hearing.	1.10	533.50
11/02/25	Kevin Warren	Draft cross examination outline of J. Cohn, with related evaluation of deposition transcript and trial exhibits to assist T. Schmeltz in preparing for hearing on LKC fee application.	7.30	3,540.50
11/02/25	Trace (Vincent P.) Schmeltz	Call with M. Hurley and S. Schultz regarding LKC trial (.5); call with S. Wells regarding strategy (.7); call with M. Robinson regarding LKC trial prep(.1); prepare for LKC trial (8.6).	9.90	9,900.00
11/03/25	Joseph Kipp	Analyze LKC reply brief in support of its fee application and summarize key arguments for P. Lohse.	0.80	388.00
11/03/25	Joseph Kipp	Research Fifth Circuit caselaw defining the word "claim" as it appears in Federal Rule of Evidence 408.	0.40	194.00
11/03/25	Joseph Kipp	Assemble exhibits for Special Committee's Response in Opposition to LKC's Emergency Motion in Limine and send to P. Lohse for review.	0.20	97.00
11/03/25	Joseph Kipp	Research Fifth Circuit caselaw allowing court to adjust attorney's contingency fee due to unanticipated circumstances and send to L. O'Farrell for review.	0.30	145.50
11/03/25	Joseph Kipp	Analyze Whinstone trial transcripts and C. Harris deposition transcript and send findings to N. He for review.	0.70	339.50
11/03/25	Paige Lohse	Preparations for hearing on LKC dispute (2.0); pre-hearing response briefs, motions and declarations (3.6); attend hearing (5.9).	11.50	8,280.00
11/03/25	Anita Peterson	Assist attorneys in executing strategy per request of T. Schmeltz focusing on preparation for 2025-11-03 hearing including logistics (6.4);	12.30	4,981.50

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		attend 2025-11-03 hearing at request of T. Schmeltz (5.9).		
11/03/25	Charlotte Underwood	Legal research to support hearing (.2); revise plan deposition materials (.8).	1.00	1,070.00
11/03/25	Kathleen L. Matsoukas	Participate in hearing on LKC fee application.	5.90	5,192.00
11/03/25	Kathleen L. Matsoukas	Draft and revise slide deck for opening argument (1.8); communicate with team regarding discount value questions for testimony (.2); revise response brief in opposition to motion to preclude use of settlement negotiations (.9); prepare for hearing by reviewing outlines and exhibits (1.5).	4.40	3,872.00
11/03/25	Kathleen L. Matsoukas	Revise draft objections to Rule 30(b)(6) topics from Transcend.	1.00	880.00
11/03/25	Leah O'Farrell	Attention to request for LKC exhibits from A. Peterson and email regarding same (.1); attention to emails regarding objections to 30(b)(6) topics for plan discovery and comments from K. Kansa regarding same (.1).	0.20	133.00
11/03/25	Leah O'Farrell	Attention to need to file document under seal and email to A. Bninski current draft of motion to seal (.1); attention to filing of declaration of M. Rosten and flag notice needed (.1).	0.20	133.00
11/03/25	Leah O'Farrell	Prepare for and attend first day of evidentiary hearing on LKC fee application.	6.20	4,123.00
11/03/25	Ning He	Draft response in opposition to motion to limit (3.5); draft declarations for hearing (3.5); prepare expert for hearing (3.5); revise direct outlines (2.2); revise cross-outlines (2.5); analyze issues related to LKC hearing (.5).	15.70	13,580.50
11/03/25	Anna Bninski	Revise declaration (.4); draft related notice filing (.4); draft motion to seal (.5); finalize filings including motion to seal and exhibits (1.7); revise demonstrative PowerPoint presentation (.6); support LKC fee dispute litigation team, including by collecting LKC extant filings, relaying sealed filings to common interest team and to LKC (1.2).	4.80	2,424.00
11/03/25	Haley Casper	Draft suggested language to hearing slides in	1.80	1,062.00

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## FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		furtherance of K. Hays opinion (.3); communicate internally regarding same (.1); circulate and communicate internally regarding key documents and materials in furtherance of hearing (.5); analyze documents regarding valuation of power credits (.5); communicate with N. He regarding same (.1); evaluate updates regarding status of hearing and next steps in furtherance of LKC dispute (.2); communicate internally regarding same (.1).		
11/03/25	Kevin Warren	Support T. Schmeltz, P. Lohse, and K. Matsoukas at hearing on LKC fee application (5.9); preparation related to draft condensed J. Cohn cross examination outline (1.5); finalize trial exhibits with P. Lohse and A. Peterson (3.2); prepare witness binders for directs of C. Blackmon and C. Topping, and cross of J. Cohn (1.7).	12.30	5,965.50
11/03/25	Kenneth Kansa	Review 4th Interim fee statement (.2); email to L. Parks on same (.1); review SAFE AHG emails on discovery (.1); review LKC emails (.2).	0.60	723.00
11/03/25	Trace (Vincent P.) Schmeltz	Prepare opening (1.8); prepare witnesses (3.7); prepare cross-examination outlines (2.4); review key documents in preparation for trial (1.5); participate in trial/hearing on LKC dispute (5.9).	15.30	15,300.00
11/04/25	Charlotte Underwood	Confer with T. Schmeltz and team regarding plan discovery (.6); coordinate conferences (.1); preparation for plan discovery (.5).	1.20	1,284.00
11/04/25	Anita Peterson	Assist attorneys in executing strategy per request of T. Schmeltz focusing on preparation for 2025-11-03 hearing including logistics (3.0); review 2025-11-03 communications with D. Eaton regarding draft objections to Transcend's Rule 30(b)(6) topics (.1); review 2025-11-03 communications with Akin regarding draft objections to Transcend's Rule 30(b)(6) topics (.2); review 2025-11-03 communications with R. Mates regarding deposition topics (.1); review 2025-11-03 communications with Porter Hedges regarding filings under seal (.2); review 2025-11-03 communications with Akin	4.60	1,863.00

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## FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		<p>regarding filings under seal (.2); review 2025-11-03 communications with LKC, Porter Hedges forwarding as-filed 2025-11-03 (Dkt 1947) SEALED Special Committee's Response in Opposition to LKC's Emergency Motion in Limine No. 1 and assist attorneys in executing strategy per request of P. Lohse (.2); review 2025-11-03 communications with LKC, Porter Hedges forwarding as-filed 2025-11-03 (Dkt 1951) SEALED Exhibit A Declaration of Mike Rosten and assist attorneys in executing strategy per request of P. Lohse (.2); review 2025-11-03 communications with Akin forwarding as-filed 2025-11-03 (Dkt 1947) SEALED Special Committee's Response in Opposition to LKC's Emergency Motion in Limine No. 1, as-filed 2025-11-03 (Dkt 1951) SEALED Exhibit A Declaration of Mike Rosten (.2); review communications with Akin regarding SAFE AHG's supplemental rolling production to Transcend Group and assist attorneys in executing strategy per request of P. Lohse (.2).</p>		
11/04/25	Anita Peterson	<p>Review 2025-11-03 communications with P. Tomasco, C. Potter, R. Mates, etc. forwarding as-filed 2025-11-03 Special Committee's Objections to Transcend's Group's Informal Proposed Rule 30(b)(6) Topics (.2); review 2025-11-03 communication with Akin Gump regarding slides (.1); update Outlook email distribution list (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); communications with investigative team regarding 2025-11-03 hearing including regarding outstanding issues and assist attorneys in executing strategy per request of T. Schmeltz (.2); review 2025-11-04 communications with P. Tomasco, C. Potter, R. Mates, etc. forwarding as-filed 2025-11-03 Special Committee's Objections to Transcend's Group's Informal Proposed Rule 30(b)(6) Topics (.1); communications with Quinn Emanuel regarding logistics following 2025-11-03 hearing</p>	2.50	1,012.50

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## FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.2); review communication with P. Tomasco regarding 2025-11-04 Daily Team Call agenda (.1); review 2025-11-04 communications with Akin regarding draft objections to Transcend's Rule 30(b)(6) topics (.1); review communications with P. Tomasco regarding passwords for Clawback productions (.2); review communication with C. Potter regarding request for extension for response to 2025-10-09 (Dkt 1764) Debtors Second Omnibus Objection (.1); review communications with P. Tomasco, M. Robinson regarding same (.2); communications with L. Parks regarding Barnes & Thornburg's Fourth Interim Fee Application (.2); review communications with Quinn Emanuel regarding coordinating filing Barnes & Thornburg's Fourth Interim Fee Application, Certification and proposed Order (.2).		
11/04/25	Anna Brinski	Review material relating to hearing of the prior day in S.D. Tex. Bankruptcy Court (.7); update case indices to reflect said events (.4); memorialize discovery exchanges (.3); provide discovery information to counsel for Debtors (.2).	1.60	808.00
11/04/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented.	0.70	504.00
11/04/25	Kathleen L. Matsoukas	Prepare for (.1) and participate in (.6) call with Debtors to discuss response to Transcend discovery.	0.70	616.00
11/04/25	Kenneth Kansa	T/c with A. Popescu on liquidation analysis (.1); email to L. Parks on Fourth Interim Fee Application (.1).	0.20	241.00
11/04/25	Trace (Vincent P.) Schmeltz	Call with M. Robinson regarding upcoming hearing (.2); call with team regarding next steps and plan discovery (.6); prepare for meet and confer (.8); review objections (.4).	2.00	2,000.00
11/05/25	Joseph Kipp	Confer with P. Lohse regarding compiling LKC briefings into centralized pleadings index.	0.10	48.50
11/05/25	Joseph Kipp	Analyze LKC and Special Committee pleadings to incorporate into pleadings index and report	1.10	533.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
11/05/25	Anita Peterson	<p>findings to P. Lohse.</p> <p>Communications with L. Parks regarding as-filed Barnes &amp; Thornburg's Fourth Interim Fee Application (.2); review 2025-11-04 communications with Quinn Emanuel regarding 2025-11-04 (Dkt 1958) Barnes &amp; Thornburg's Fourth Interim Fee Application, 2025-11-04 (Dkt 1958-1) (proposed) Order and assist attorneys in executing strategy per request of K. Kansa (.2); communications with fee notice parties forwarding 2025-11-04 (Dkt 1958) Barnes &amp; Thornburg's Fourth Interim Fee Application, 2025-11-04 (Dkt 1958-1) (proposed) Order (.2); communication with United States Trustee forwarding 2025-11-04 (Dkt 1958) Barnes &amp; Thornburg's Fourth Interim Fee Application, 2025-11-04 (Dkt 1958-1) (proposed) Order and Ledes data (.2); precise tracking and timely updates of deadlines and filings (.2); communications with K. Kansa regarding as-filed Barnes &amp; Thornburg's Fourth Interim fee application (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); communications with investigative team regarding 2025-11-03 hearing follow up (.3); review as-filed 2025-11-03 (Dkt 1941) Special Committee's Motion to Seal Protected Pleadings, 2025-11-03 (Dkt 1942) SEALED Special Committee's Reply in Support of its Emergency Motion, 2025-11-03 (Dkt 1942) SEALED Special Committee's Reply in Support of its Emergency Motion with exhibits, 2025-11-03 (Dkt 1944) SEALED Special Committee's Response in Opposition to LKC's Emergency Motion, 2025-11-03 (Dkt 1947) SEALED Special Committee's Response in Opposition to LKC's Emergency Motion in Limine No. 1 with exhibit and assist attorneys in executing strategy per request of P. Lohse (1.1); review communications with C. Potter regarding Debtors' Responses and Objections to the Transcend Group's Information Notice of</p>	4.90	1,984.50

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		30(b)(6) Deposition (.1); review communications with C. Potter regarding deposition schedule (.1); review and revise monthly fee statement spreadsheet (1.8).		
11/05/25	Leah O'Farrell	Drafting chart of Transcend RFPDs.	0.50	332.50
11/05/25	Kathleen L. Matsoukas	Participate in initial preparation session for 30(b)(6) witnesses (2.3); follow-up discussions with T. Schmeltz regarding preparation action items (.2); communicate with K. Kansa regarding specific documents for prep (.2); prepare for and participate in meet and confer (.8).	3.50	3,080.00
11/05/25	Kenneth Kansa	Participate in witness preparation session for 30(b)(6) depositions (2.3); email to C. Underwood on trial prep and witness testimony on releases (.1); review K. Matsoukas email on warrants (.1).	2.50	3,012.50
11/05/25	Charlotte Underwood	Conduct legal and factual research regarding substantial contribution and related plan concepts (.9); support to plan discovery team (.2).	1.10	1,177.00
11/05/25	Kevin Warren	Review materials with respect to LKC fee application hearing.	0.70	339.50
11/05/25	Kevin Warren	Evaluate docket to determine outstanding issues with respect to LKC fee dispute post November 3rd hearing on the same to assist T. Schmeltz and P. Lohse in preparing an agenda regarding LKC fee application for next hearing date.	1.60	776.00
11/05/25	Haley Casper	Evaluate status of LKC dispute and outstanding issues (.2); strategize internally regarding same and strategy for energy credit issue (.3).	0.50	295.00
11/05/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.5); confer with J. Kipp regarding LKC briefings (.1).	0.60	432.00
11/05/25	Anna Bninski	Review team correspondence for material to incorporate into case indices.	0.20	101.00
11/05/25	Trace (Vincent P.) Schmeltz	Work on next steps with respect to LKC claim (1.6); revise objections to plan discovery (.4);	5.70	5,700.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		preparation session for 30(b)(6) depositions (2.3); calls with C. Potter (.2), R. Mates (.2), and K. Matsoukas (.2) regarding plan discovery and strategy; participate in meet and confer (.8).		
11/06/25	Anita Peterson	Review and revise monthly fee statement spreadsheet including communications with timekeepers (5.2); review communications with R. Mates, C. Potter, Akin, P. Tomasco regarding deposition scheduling and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with Akin regarding proposed Stipulation and Agreed Order Regarding the Production and Use of Mediation-Related Documents and Communications and assist attorneys in executing strategy per request of C. Underwood (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	5.80	2,349.00
11/06/25	Aaron Gavant	Multiple communications with BT team regarding anticipated next steps.	0.40	362.00
11/06/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented.	0.10	72.00
11/06/25	Kenneth Kansa	Plan confirmation call with Quinn Emanuel and Province teams (.5); t/c S. Schultz on plan confirmation preparation and warrant issues (.4); email to K. Matsoukas on warrant issues (.1); review emails on confirmation preparations and discovery responses (.3); review S. Baham email on SAFEs solicitation (.2).	1.50	1,807.50
11/06/25	Trace (Vincent P.) Schmeltz	Call with Akin Gump and Quinn Emanuel regarding plan issues (.5); call with M. Robinson regarding same (.2).	0.70	700.00
11/07/25	Anita Peterson	Review and revise monthly fee statement spreadsheet (4.3); communications with Quinn Emanuel regarding 2025-11-03 hearing materials (.2); assist attorneys in executing strategy per request of T. Schmeltz focusing on follow up from 2025-11-03 hearing (.7); review multiple communications with Akin, M.	6.90	2,794.50

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## FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Robinson regarding updated liquidation analysis (.3); review communications with P. Tomasco regarding confirmation planning call (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); confer with T. Schmeltz regarding withdrawal of objection by Transcend (.2); review as-filed 2026-11-06 (Dkt 1976) Notice of Withdrawal of Transcend Group's Objection to Barnes & Thornburg LLC's Twelfth Monthly Fee Statement and assist attorneys (.2); communication with clients regarding invoice 3474442 for August 2025 fees and assist attorneys in executing strategy per request of T. Schmeltz (.2); communication with investigative team regarding proposed Stipulation and Agreed Order Regarding the Production and Use of Mediation-Related Documents and Communications (.1); review communications with investigative team regarding damages (.1).		
11/07/25	Leah O'Farrell	Work on responses and objections to discovery requests.	1.20	798.00
11/07/25	Kathleen L. Matsoukas	Prepare for and participate in call to discuss D. Eaton preparation (.7); communicate with C. Potter regarding document request responses (.1); communicate with team regarding action items for D. Eaton deposition preparation (.3); work on D. Eaton preparation materials for review and preparation outline (.8).	1.90	1,672.00
11/07/25	Kenneth Kansa	Call with Quinn Emanuel and Province teams on deposition preparation (.3); email to BT team on warrant documents (.1); confer with T. Schmeltz regarding plan issues (.2).	0.60	723.00
11/07/25	Ning He	Analyze materials related to documents provided to Transcend and 30(b)(6) topics.	1.00	865.00
11/07/25	Trace (Vincent P.) Schmeltz	Calls with D. Eaton (.2) and K. Kansa (.2) regarding plan issues; e-mail exchanges regarding plan issues (.4); confer with A. Peterson regarding Transcend Group's Notice of Withdrawal (.2); review liquidation analysis	1.30	1,300.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		(.3).		
11/08/25	Anita Peterson	Review communications with Akin regarding SAFE AHG's supplemental rolling production to Transcend Group and assist attorneys in executing strategy per request of C. Underwood (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.40	162.00
11/08/25	Kathleen L. Matsoukas	Review documents potentially relevant to D. Eaton deposition preparation (1.6); communicate with T. Schmeltz regarding same (.1).	1.70	1,496.00
11/09/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse (.2); review communications with LKC regarding dates for continued fee application hearing (.1); communications with investigative team regarding same (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.1).	0.50	202.50
11/09/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented.	0.60	432.00
11/09/25	Kenneth Kansa	Email to N. He on plan (.1); email to K. Matsoukas on disclosure statement and comments in same regarding SAFE AHG (.1); review memo on settlement research and email K. Matsoukas on same (.2).	0.40	482.00
11/09/25	Kathleen L. Matsoukas	Draft and revise preparation memoranda for D. Eaton for Rule 30(b)(6) deposition preparation (3.8); communicate with team regarding questions for same (.7); review materials in connection with drafting preparation materials (1.3).	5.80	5,104.00
11/09/25	Anna Bninski	Correspond with P. Lohse regarding hearing transcript.	0.10	50.50
11/09/25	Ning He	Analyze materials regarding preparation for D. Eaton deposition.	2.40	2,076.00
11/10/25	Joseph Kipp	Confer with P. Lohse regarding LKC escrow fee	0.60	291.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		amount and transcript redactions.		
11/10/25	Joseph Kipp	Analyze pleadings to calculate proper fee amount to be sent to escrow and compare to figures prepared by J. Wolfshohl.	0.90	436.50
11/10/25	Joseph Kipp	Analyze LKC's second fee application to ascertain the portion of the fees attributable to retention related issues.	1.00	485.00
11/10/25	Joseph Kipp	Produce summary of LKC fees described in fee app (.4); correspondence with P. Lohse in preparation for conferral with LKC (.1).	0.50	242.50
11/10/25	Leah O'Farrell	Revise objections to request for production and email same to N. He and K. Matsoukas.	0.50	332.50
11/10/25	Leah O'Farrell	Review email from K. Matsoukas regarding objections and messages setting call to discuss discovery.	0.10	66.50
11/10/25	Leah O'Farrell	Create chart of potential documents to produce in plan discovery per emails from K. Matsoukas.	0.90	598.50
11/10/25	Leah O'Farrell	Call with K. Matsoukas and N. He regarding plan discovery and objections.	0.40	266.00
11/10/25	Leah O'Farrell	Begin to build out chart on potential documents to produce regarding plan discovery.	1.20	798.00
11/10/25	Leah O'Farrell	Attention to conversation regarding common interest privilege with N. He and K. Matsoukas.	0.10	66.50
11/10/25	Leah O'Farrell	Continue working on documents to produce regarding plan discovery.	0.80	532.00
11/10/25	Leah O'Farrell	Call with K. Kansa regarding plan discovery.	0.40	266.00
11/10/25	Leah O'Farrell	Correspondence with N. He regarding SAFE production and discovery on substantial contribution.	0.20	133.00
11/10/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (1.4); confer with J. Kipp regarding LKC (.6); delegate tasks to ensure court rulings implemented and prepared for conferral with LKC (.3).	2.30	1,656.00
11/10/25	Charlotte Underwood	Communications with K. Matsoukas on plan related discovery (.5); coordinate client call (.1).	0.60	642.00
11/10/25	Anna Bninski	Review trust documents (.7); correspond with N.	0.80	404.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		He regarding same (.1).		
11/10/25	Kenneth Kansa	T/c with Quinn Emanuel, Province, T. Schmeltz, K. Matsoukas on plan discovery (.5); review warrant documents (.2); email to P. Tomasco on same (.1); email to S. Schultz on confirmation brief (.1); t/c L. O'Farrell on plan discovery (.4); review discovery emails (.2); email to N. He on discovery regarding warrants (.2).	1.70	2,048.50
11/10/25	Ning He	Revise objections to Transcend discovery requests (2.5); confer with K. Matsoukas and L. O'Farrell regarding plan discovery (.4); research and analyze issues regarding 30(b)(6) topics (.8); analyze materials regarding preparation for Eaton deposition (2.2); confer with D. Eaton regarding preparation (1.9); analyze documents regarding trust agreements (1.0).	8.80	7,612.00
11/10/25	Kathleen L. Matsoukas	Communications with C. Underwood regarding Harvey invoice analysis (.4); confer with N. He and L. O'Farrell regarding discovery (.4); draft and revise objections (.8); communicate with Debtors regarding action items (.3); multiple discussions and communications with D. Eaton regarding deposition preparation (1.3); multiple calls regarding Transcend plan discovery (.9); participate in discussion with SAFE AHG counsel regarding 30(b)(6) topics and testimony (.8); work to revise preparation slide deck and outline for D. Eaton (.8); call with Debtors, Province, T. Schmeltz, and K. Kansa on witness preparation for confirmation (.5).	6.20	5,456.00
11/10/25	Trace (Vincent P.) Schmeltz	Call with the SAFE AHG regarding 30(b)(6) (.8); 30(b)(6) witness preparation (Eaton) (1.9); call with Debtors, Province, K. Matsoukas, K. Kansa on plan discovery (.5); call with C. Topping regarding plan discovery (.2); 30(b)(6) witness preparation (Robinson) (2.0); call with Akin regarding witness preparation (.3); call with M. Robinson regarding same (.3); follow-up with D. Eaton on witness preparation (.6).	6.60	6,600.00
11/11/25	Joseph Kipp	Analyze November 3 hearing transcript and apply redactions pursuant to Federal Rule of Bankruptcy 9037.	2.70	1,309.50

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
11/11/25	Joseph Kipp	Analyze C. Topping hearing testimony and deposition transcript and extract key facts relating to Porter Hedges invoices.	0.80	388.00
11/11/25	Joseph Kipp	Research 5th Circuit caselaw applying common interest privilege protection to negotiations had between plan proponents.	1.90	921.50
11/11/25	Kathleen L. Matsoukas	Multiple communications with D. Eaton on witness preparation (.4); participate in call with Quinn Emanuel regarding plan confirmation action items (.3); revise D. Eaton preparation slide deck and consulted materials in connection with same (2.6); confer with N. He and L. O'Farrell regarding additional preparation materials and documents to be provided to D. Eaton (1.3); draft and revise D. Eaton preparation outline (3.8); communicate with T. Schmeltz and D. Eaton regarding preparation (.4).	8.80	7,744.00
11/11/25	Anita Peterson	Review communications with D. Eaton regarding preparation materials (.1); communications with investigative team regarding same (.1); review and revise monthly fee statement spreadsheet (3.4); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); communications with T. Schmeltz regarding August, September invoices and follow up regarding same (.2); communications with Client regarding August invoice (.2); communications with Client regarding September invoice (.2); precise tracking and timely updates of deadlines and filings (.1); review communications from P. Tomasco regarding confirmation planning call (.1); review communication with C. Topping regarding 2025-10-30 hearing (.1); review communications with C. Topping regarding 2025-11-03 hearing (.1); communications with investigative team regarding same (.1); review communications with Akin regarding tentative plan, deposition preparation (.1); communication with investigative team regarding same (.1).	5.30	2,146.50

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
11/11/25	Leah O'Farrell	Revise objections to first request for production of documents and pull proposed production into one folder.	1.30	864.50
11/11/25	Leah O'Farrell	Confer with K. Matsoukas and N. He regarding Disclosure Statement for D. Eaton witness prep.	1.30	864.50
11/11/25	Leah O'Farrell	Review revisions to objections from K. Matsoukas.	0.20	133.00
11/11/25	Leah O'Farrell	Correspondence with K. Matsoukas and N. He regarding warrant discovery.	0.10	66.50
11/11/25	Leah O'Farrell	Review Plan related to Causes of Action and draft proposed objection to Request related to same.	0.20	133.00
11/11/25	Aaron Gavant	Research issues relating to potential plan objections.	0.50	452.50
11/11/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (1.0); delegate tasks to ensure court rulings implement and prepare for conferral with LKC (.4).	1.40	1,008.00
11/11/25	Charlotte Underwood	Confer with client regarding plan related negotiations (.5); communications with team regarding plan discovery preparations (.2).	0.70	749.00
11/11/25	Anna Bninski	Review trust documents for terms relevant to plan negotiation (1.1); confer with N. He regarding same (.4); summarize contents of same (.4); correspond with N. He regarding same (.1).	2.00	1,010.00
11/11/25	Ning He	Analyze trust agreements (.8); confer with A. Bninski regarding trust agreements (.4); confer with K. Matsoukas and L. O'Farrell regarding D. Eaton prep (1.3); revise objections to Transcend discovery (2.2); analyze SAFE productions (1.5); analyze materials regarding Eaton preparation (1.4).	7.60	6,574.00
11/11/25	Kenneth Kansa	Call with S. Schultz on proposed settlement and implementation of same (.4); call with SAFE AHG on proposed settlement (.5); call with Special Committee, Province, and T. Schmeltz on same (.5); telephone conference with A. Popescu on projections (.1); email to S. Schultz	1.60	1,928.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		on confirmation brief (.1).		
11/11/25	Trace (Vincent P.) Schmeltz	Calls with Quinn Emanuel (.3) and Akin (.4) regarding plan discovery issues; call with D. Eaton, Province, and K. Kansa regarding proposed settlement (.5); prepare for upcoming discovery (.6).	1.80	1,800.00
11/12/25	Leah O'Farrell	Begin review of redline plan to prep D. Eaton on changes that go to substantial contribution.	0.50	332.50
11/12/25	Leah O'Farrell	Call with P. Lohse regarding response to LKC on setting hearing from bankruptcy view.	0.10	66.50
11/12/25	Paige Lohse	Communicate with LKC and court regarding resetting the LKC hearing (.4); confer with L. O'Farrell regarding same (.1).	0.50	360.00
11/12/25	Kenneth Kansa	Email to D. Eaton on settlement proposal call (.1); call with Special Committee and Province on settlement (.5); call with Special Committee, Province, and Quinn Emanuel teams on settlement (.5); call with Debtors, Special Committee, Province, and Akin teams on settlement (.5); further call with Debtors, Special Committee, and Province on settlement structure (1.1); telephone call with S. Schultz on settlement structure (.3); review M. Hurley email on settlement proposal (.1); email to A. Popsecu on updated projections (.1); follow up on D. Eaton questions on proposal (.2); communications with K. Matsoukas on settlement structure and timing (.2)	3.60	4,338.00
11/12/25	Kathleen L. Matsoukas	Participate in call with client and Province to discuss allocation.	0.50	440.00
11/12/25	Carrie M. Raver	Evaluate prior emails and correspond with team about payment issues regarding \$8.5 million payment.	0.50	475.00
11/12/25	Carrie M. Raver	Correspond about \$8.5 million payment issues with C. Topping, and C. Blackmon.	0.20	190.00
11/12/25	Trace (Vincent P.) Schmeltz	Calls with client, Quinn Emanuel and Akin regarding cash waterfall and its impact on potential settlement (1.0); call with Rhodium Board (.7); multiple calls with parties regarding potential settlement of disputed plan issues (1.6); draft key terms for settlement (2.0).	5.30	5,300.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
11/13/25	Anita Peterson	Review and revise monthly fee statement spreadsheet (5.0); review communications with Akin regarding professional fees (.1); review communication with P. Tomasco regarding same (.1); review communications with C. Potter regarding proposed agreement to suspend certain deadlines (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3); review communications with P. Tomasco regarding draft confirmation brief (.1).	5.70	2,308.50
11/13/25	Kenneth Kansa	Call with Quinn Emanuel, Province, T. Schmeltz on potential settlement (.7); telephone conferences with D. Eaton on same (.2); telephone conferences with M. Robinson and A. Popescu (in part) on revised proposal to SAFEs (.6); draft and revise proposal to SAFEs (.5); further telephone conference with A. Popescu on same (.2); further telephone conference with M. Robinson on proposal to SAFEs (.2); revise proposal to SAFEs and dispatch same (.3); email to D. Eaton on PSA and timing (.2); review confirmation materials (.2); review emails on SAFEs' proposals (.3)	3.40	4,097.00
11/13/25	Trace (Vincent P.) Schmeltz	Calls regarding potential settlement of disputed plan issues (2.0); call with D. Eaton, S. Wells, D. Dunn and M. Robinson regarding settlement strategy (.4).	2.40	2,400.00
11/14/25	Kathleen L. Matsoukas	Communicate with N. He and team regarding review of Porter Hedges invoices and issues arising from same.	0.40	352.00
11/14/25	Kenneth Kansa	Call with Special Committee, Province, Quinn, and T. Schmeltz on Transcend settlement and SAFE issues (1.0); t/c with D. Eaton on Transcend claim issues (.2); review emails on Transcend settlement (.3).	1.50	1,807.50
11/14/25	Ning He	Analyze bills of Porter Hedges regarding LKC fee dispute.	0.40	346.00
11/14/25	Trace (Vincent P.) Schmeltz	Meet with Debtor and Special Committee teams regarding SAFE issues (1.0); address open issues in discovery (2.2); call with M. Hurley and	3.50	3,500.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		D. Dunn regarding SAFE issues (.3).		
11/15/25	Trace (Vincent P.) Schmeltz	Call with M. Robinson and D. Dunn regarding settlement options (.3); call with D. Eaton regarding same (.2); text exchange with M. Hurley regarding settlement rubric (.2).	0.70	700.00
11/16/25	Charlotte Underwood	Analyze records related to consideration of Temple Sale.	1.10	1,177.00
11/16/25	Kenneth Kansa	Participate in update call with Special Committee and T. Schmeltz (.2); review confirmation-related materials and outline pending tasks (1.1) .	1.30	1,566.50
11/16/25	Trace (Vincent P.) Schmeltz	Interview of J. Nardini and C. Topping regarding J. Norr history (in aid of settlement) (2.7); call with Special Committee and D. Dunn regarding settlement options (.2).	2.90	2,900.00
11/17/25	Anita Peterson	Assist attorneys in executing strategy per request of K. Matsoukas focusing on precise tracking and timely updates of deadlines and filings (.1); review and revise monthly fee statement spreadsheet (.9); communication with K. Kansa regarding same (.1); draft Barnes & Thornburg LLP's Fourteenth Monthly Fee Statement for the Period October 1, 2025, Through October 31, 2025 (.4); review communications with P. Tomasco regarding confirmation brief and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communication with LKC regarding outstanding issues (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.1).	1.90	769.50
11/17/25	Kenneth Kansa	T/c with M. Robinson on plan supplement and confirmation brief (.2); t/c with K. Matsoukas on same (.2); t/c with S. Schultz on same (.3); further t/c with K. Matsoukas on confirmation prep (.4); email to K. Matsoukas on confirmation brief (.1); draft D&O insurance provisions for brief (.9); circulate same to BT team with comment (.1); email to T. Schmeltz on same (.3); follow up email to T. Schmeltz on same (.1); email P. Tomasco on confirmation brief	4.50	5,422.50

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## FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		provisions on D&O settlement with covering comments (.2); review and revise provision for confirmation brief on substantial contribution claim (.5); email to K. Matsoukas on same (.1); review and comment on confirmation brief draft from P. Tomasco (1.0); brief review of plan supplement from R. Izakelian (.1).		
11/17/25	Kathleen L. Matsoukas	Discuss draft writeup of D&O settlement for confirmation brief with K. Kansa (.2); multiple emails with T. Schmeltz regarding same (.3); discuss substantial contribution and D&O settlement writeups with K. Kansa (.4); draft portion of D&O settlement brief (.8); draft insert for confirmation brief regarding SAFE AHG substantial contribution and communicated with K. Kansa regarding same (.8); review revisions to same (.2).	2.70	2,376.00
11/18/25	Anita Peterson	Review and edit monthly fee statement spreadsheet (.9); review multiple communications with LKC regarding outstanding issues and assist attorneys in executing strategy per request of T. Schmeltz (.3); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2); assist attorneys in executing strategy per request of T. Schmeltz focusing on 2025-10-07 (Dkt 1747) Plan Support Agreement (.3).	1.70	688.50
11/18/25	Kevin Warren	Evaluate LKC hearing agenda with related to-do items for P. Lohse to support preparation for second day of LKC fee application hearing (2.1); identify LKC punitive damages analysis for T. Schmeltz to support positions relating to calculation of success fee to prepare for hearing (.8).	2.90	1,406.50
11/18/25	Kenneth Kansa	T/c with S. Schultz on plan supplement (.3); t/c with M. Robinson on same (.2); review stipulation drafts with Transcend (.3); review revised confirmation brief draft from P. Tomasco (.1); review P. Tomasco email on plan treatment of indemnification obligations (.1).	1.00	1,205.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
11/18/25	Carrie M. Raver	Address extension of Side A policy for independent directors.	0.20	190.00
11/18/25	Trace (Vincent P.) Schmeltz	Review proposed stipulation (.5); address potential settlement with LKC (1.3); call with W. Thompson regarding same (.2); call with M. Robinson regarding plan supplement (.2); address e-mails (.2).	2.40	2,400.00
11/19/25	Anita Peterson	Review and edit monthly fee statement spreadsheet and related Barnes & Thornburg LLP's Fourteenth Monthly Fee Statement for the Period October 1, 2025, Through October 31, 2025 with exhibits (7.6); communications with T. Schmeltz regarding same (.2); communications with Quinn Emanuel to coordinating filing of same (.2); assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-12-03 hearing including hearing logistics (2.3); review communications with M. Hurley, C. Potter regarding LKC demand (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	10.70	4,333.50
11/19/25	Kenneth Kansa	T/c with S. Schultz on plan supplement and included documents (.4); further t/c with S. Schultz on plan supplement documents and filing (.2); t/c with S. Schultz and P. Tomasco on same (.1); t/c with S. Schultz on plan supplement (.1); review proposed budget and email to A. Popsecu on same (.1); review Plan Administrator Agreement and email to Quinn and Akin teams on same (.5); emails to R. Izaakelian on finalization of plan supplement (.4); further review of plan supplement materials (.6); review T. Schmeltz emails on settlement (.2); review Quinn and Akin emails on schedules of assumed contracts (.3) .	2.90	3,494.50
11/19/25	Paige Lohse	Analyze strategy and open tasks for resuming preparations for hearing on LKC fee dispute (1.5); delegate tasks for resuming hearing preparations (.8); communications in furtherance of resuming preparations for LKC hearing. (.3).	2.60	1,872.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
11/19/25	Carrie M. Raver	Address issues concerning tail coverage for Side A for independent directors and correspond with C. Topping regarding the same.	0.20	190.00
11/20/25	Anita Peterson	Finalize Barnes & Thornburg LLP's Fourteenth Monthly Fee Statement for the Period October 1, 2025, Through October 31, 2025 with exhibits (.5); communications with Quinn Emanuel forwarding same with Ledes data for filing (.2); assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-12-03 hearing including hearing logistics (7.0); precise tracking and timely updates of deadlines and filings (.1); communications with investigative team regarding LKC hearing (.2); review communications with M. Hurley regarding settlement communications (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2); review as-filed 2025-11-20 (Dkt 2005) Barnes & Thornburg LLP's Fourteenth Monthly Fee Statement for the Period October 1, 2025 through October 31, 2025 (.2); emails with fee notice parties regarding 2025-11-20 (Dkt 2005) B&T's Fourteenth Monthly Fee Statement with Exhibits A-C (.2); review communication with United States Trustee regarding 2025-11-20 (Dkt 2005) B&T's Fourteenth Monthly Fee Statement with Exhibits A-C and Ledes data (.2); precise tracking and timely updates of deadlines and filings (.2);	9.10	3,685.50
11/20/25	Charlotte Underwood	Review stipulation of settlement (.9); communications with T. Schmeltz regarding same (.1); coordinate filing regarding same (.2).	1.20	1,284.00
11/20/25	Paige Lohse	Analyze strategy and open tasks for resuming preparations for hearing on LKC fee dispute (1.5); delegate tasks for resuming hearing preparations (.1); analyze objections to LKC's fee application and related evidence in preparation for narrowing issues at LKC hearing (2.7).	4.30	3,096.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
11/20/25	Kenneth Kansa	Review Transcend stipulation (.6); email to BT team on same (.1); follow up emails to C. Underwood on same (.2); review R. Mates email on plan materials (.1).	1.00	1,205.00
11/21/25	Joseph Kipp	Prepare for LKC hearing.	0.60	291.00
11/21/25	Kenneth Kansa	T/c with D. Eaton on preparation of confirmation brief and hearing evidence (.1); email to B. Funk on plan revision to address release issue (.1); review revised Plan Administrator Agreement from R. Izakelian (.1); email R. Izakelian regarding same (.1); review balloting emails (.1); review LKC emails (.2); review LKC plan objection (.2); review C. VanZoeren response to plan (.1); review and revise confirmation brief draft (partial) (1.2).	2.20	2,651.00
11/21/25	Paige Lohse	Analyze strategy and open tasks for resuming preparations for hearing on LKC fee dispute (.4); analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (1.2); conferral communications with LKC (.6); continue to analyze objections to LKC's fee application and related evidence in preparation for narrowing issues at LKC hearing (2.2).	4.40	3,168.00
11/21/25	Carrie M. Raver	Address policy extension issues and correspond with client regarding the same.	0.20	190.00
11/22/25	Leah O'Farrell	Attention to emails from P. Lohse regarding need to draft reply to LKC's objection and thoughts on same from K. Kansa.	0.20	133.00
11/22/25	Paige Lohse	Analyze strategy for reply to LKC's objection to confirmation hearing (.3); delegate tasks for reply to LKC's objection (.2).	0.50	360.00
11/23/25	Leah O'Farrell	Research regarding reply to LKC's objection (1.6); communications with K. Kansa regarding standing argument (.1).	1.70	1,130.50
11/23/25	Leah O'Farrell	Draft reply to LKC's objection to plan.	1.90	1,263.50
11/23/25	Leah O'Farrell	Finish drafting reply to LKC's objection to plan (.9); draft email to K. Kansa and P. Lohse regarding same (.1).	1.00	665.00
11/23/25	Leah O'Farrell	Research regarding Court's ability to alter	0.50	332.50

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
		success fee regarding LKC dispute.		
11/24/25	Leah O'Farrell	Call with P. Lohse regarding reply brief and standing issue.	0.30	199.50
11/24/25	Leah O'Farrell	Review edits from P. Lohse on Reply to LKC (.1); revise reply to LKC per comments from P. Lohse (.3).	0.40	266.00
11/24/25	Leah O'Farrell	Further revise LKC reply per comments from K. Kansa (.4); communications with P. Lohse regarding question on potential edit (.1)	0.50	332.50
11/24/25	Leah O'Farrell	Make revisions to reply per email from K. Matsoukas and comment from T. Schmeltz (.2); draft email to BT team regarding reply and standing argument (.5).	0.70	465.50
11/24/25	Kenneth Kansa	Participate in preparation call for confirmation-related documents and hearing (.9); t/c with S. Schultz on preparation of confirmation documents (.4); review reply to LKC plan objection and email to BT team on same (.5); review and revise confirmation brief (3.7); email to D. Eaton on same (.1); email to P. Tomasco on same (.1).	5.70	6,868.50
11/24/25	Paige Lohse	Revise reply to LKC's objection to the plan (1.0); analyze strategy and open tasks for preparations for hearing on LKC fee dispute (.9); continue to analyze objections to LKC's fee application and related evidence in preparation for narrowing issues at LKC hearing (1.3); continue to analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.7); confer with L. O'Farrell regarding reply brief (.3).	4.20	3,024.00
11/24/25	Kevin Warren	Identify trial exhibits related to valuations put together by Province (1.0), LKC's model for energy credit claim (.8), and relating to Building D claim (.7) to assist P. Lohse and T. Schmeltz with preparing for second day of hearing on LKC final fee application.	2.50	1,212.50
11/25/25	Joseph Kipp	Address transcript request filing.	0.30	145.50
11/25/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-12-03 hearing including hearing logistics	2.20	891.00

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Date	Name	Description	Hours	Amount
		(1.2); communications with M. Rosten regarding hearing (.2); communications with investigative team regarding same (.2); review communication with Akin regarding insurance coverage (.1); communications with investigative team regarding same (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).		
11/25/25	Kenneth Kansa	Conference with plan proponents and plan support parties on plan confirmation materials and filing timing (.5); further conference with SAFE AHG/Transcend on approach to LKC objection (.8); t/c with S. Schultz on confirmation materials (.2); communications with T. Schmeltz on confirmation hearing (.1); t/c with S. Schultz on same (.2); email to D. Eaton on LKC response (.2); email to T. Schmeltz and K. Matsoukas on Transcend stipulation (.1); email to Akin team on confirmation brief with covering comments (.2); emails to P. Lohse on confirmation objection (.2); review and revise D. Eaton confirmation declaration (1.9); email D. Eaton on same with covering comments (.2).	4.60	5,543.00
11/25/25	Leah O'Farrell	Attention to emails from D. Eaton regarding reply to LKC's objection to plan (.1); attention to inquiry from P. Lohse regarding exhibit tracker for LKC Dispute (.1).	0.20	133.00
11/25/25	Leah O'Farrell	Call with P. Lohse regarding transcript request and scheduling of hearing on motion to enforce PSA.	0.20	133.00
11/25/25	Leah O'Farrell	Call with Transcend, BT, and Akin regarding status of LKC Dispute.	0.80	532.00
11/25/25	Charlotte Underwood	Communications with T. Schmeltz regarding insurance term sheet and plan confirmation topics (.2); review records related to PSA (.2).	0.40	428.00
11/25/25	Kevin Warren	Implement P. Lohse feedback with respect to identifying exhibits relating to valuations of assets compared to damages claims to assist P. Lohse and T. Schmeltz in preparing for hearing on LKC fee application.	1.40	679.00

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## FIDUCIARY DUTY INVESTIGATION

<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
11/25/25	Paige Lohse	Continue to revise reply to LKC's objection to the plan (.5); analyze strategy and open tasks for preparations for hearing on LKC fee dispute (.3); continue to analyze objections to LKC's fee application and related evidence in preparation for narrowing issues at LKC hearing (1.5); continue to analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (2.0); confer with L. O'Farrell regarding motion to enforce PSA (.2).	4.50	3,240.00
11/26/25	Charlotte Underwood	Review confirmation related briefing.	0.30	321.00
11/26/25	Ning He	Analyze potential claims of oversight failures.	3.50	3,027.50
11/26/25	Paige Lohse	Analyze strategy and open tasks for preparations for hearing on LKC fee dispute (.4); continue to analyze objections to LKC's fee application and related evidence in preparation for narrowing issues at LKC hearing (1.2); continue to analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.9).	2.50	1,800.00
11/26/25	Kenneth Kansa	Email to R. Izakelian on confirmation brief and plan revisions (.6); draft Plan revisions regarding Transcend settlement (1.1); email to S. Schultz on same (.1); review and revise Eaton Declaration (.8); email to R. Izakelian on same (.1); further email to A. Jaquet on same (.1); review voting certification (.3); email to R. Izakelian on same (.1); call with Plan Proponents on finalizing Plan documents (.5); t/c with S. Schultz on Plan documents (.1); t/c with A. Popescu on calls with post-emergence parties (.1)	3.90	4,699.50
11/28/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-12-03 hearing including hearing logistics.	2.10	850.50
11/28/25	Carrie M. Raver	Communications with T. Schmeltz on strategy for call with M. Hurley regarding insurance coverage issues.	0.20	190.00
11/28/25	Carrie M. Raver	Call with M. Hurley regarding insurance	0.20	190.00

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## FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		coverage issues (.1); correspond with T. Schmeltz thereafter (.1).		
11/28/25	Kenneth Kansa	Review and revise confirmation order draft (1.7); emails to R. Izakelian on same (.2); email to A. Jaquet on Eaton declaration (.2); email to C. Raver on insurance call (.1); email to D. Eaton on declaration inserts regarding substantial contribution claim (.3); further review and revise confirmation order draft (.8); circulate same to Plan Proponents with covering comments (.2); review and revise D. Eaton declaration (2.4); email to D. Eaton on same (.1); circulate same to Akin team with comments (.2); further email to D. Eaton on same (.1); email to T. Schmeltz on LKC plan objection (.1); t/c with D. Eaton on declaration (.1); t/c with S. Schultz on confirmation pleadings status (.3); review plan provisions for second amended plan (.2); review additional plan supporting documents (1.4).	8.40	10,122.00
11/29/25	Anita Peterson	Review incoming communication regarding 2025-11-28 SAFE AHG document production and assist attorneys in executing strategy per request of C. Underwood (.2); assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-12-03 hearing including hearing logistics (.7); review communication with Akin regarding confirmation brief and assist attorneys in executing strategy per request of C. Underwood (.2).	1.10	445.50
11/29/25	Leah O'Farrell	Research regarding modifying success fee.	1.60	1,064.00
11/29/25	Kenneth Kansa	Email to C. Underwood on substantial contribution brief revisions (.1); review revised pleading drafts (.2).	0.30	361.50
11/29/25	Paige Lohse	Preparations for hearing on LKC fee dispute (.9); continue to analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.3).	1.20	864.00
11/30/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-12-03 hearing including hearing logistics	0.80	324.00

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## FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.6); review communication with Akin regarding confirmation brief and assist attorneys in executing strategy per request of C. Underwood (.2).		
11/30/25	Leah O'Farrell	Continue research regarding modifying success fee.	1.30	864.50
11/30/25	Charlotte Underwood	Review and revise confirmation related briefing.	0.40	428.00
11/30/25	Paige Lohse	Preparations for hearing on LKC fee dispute (1.3); continue to analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.4).	1.70	1,224.00
11/30/25	Kenneth Kansa	Email S. Schultz regarding coordination call (.1); email R. Izakelian regarding Plan comments (.1); review and revise confirmation brief insert on SAFE AHG and email to BT team on same (1.6); review SAFEs' revisions to Eaton declaration and email to T. Schmeltz on same (.6); emails to BT team on document revisions (.3); email to T. Schmeltz on Eaton declaration (.1); t/c S. Schultz on confirmation brief and Eaton declaration (.3); email to R. Izakelian on Robinson declaration (.1); participate in coordination call with Plan Proponents (.5); review P. Tomasco outline of remaining documents to finalize (.1); further revise confirmation brief insert and email SAFE AHG on same (2.2); final review of second amended plan (.1); final review of confirmation order (.4); review SAFE AHG revisions to confirmation brief and Eaton declaration and emails to BT team on same (1.1).	7.60	9,158.00

Fees for Services

\$ 412,715.00

	Hours	Rate	Amount
Carrie M. Raver	1.70	\$950.00	\$1,615.00
Aaron Gavant	0.90	\$905.00	\$814.50
Kathleen L. Matsoukas	60.10	\$880.00	\$52,888.00

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## FIDUCIARY DUTY INVESTIGATION

	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Ning He	68.60	\$865.00	\$59,339.00
Paige Lohse	58.80	\$720.00	\$42,336.00
Leah O'Farrell	34.80	\$665.00	\$23,142.00
Haley Casper	16.40	\$590.00	\$9,676.00
Anna Brinski	18.10	\$505.00	\$9,140.50
Joseph Kipp	12.90	\$485.00	\$6,256.50
Kevin Warren	40.60	\$485.00	\$19,691.00
Anita Peterson	89.40	\$405.00	\$36,207.00
Kenneth Kansa	63.30	\$1,205.00	\$76,276.50
Charlotte Underwood	11.90	\$1,070.00	\$12,733.00
Trace (Vincent P.) Schmeltz	62.60	\$1,000.00	\$62,600.00
	<b>TOTALS</b>	<b>540.10</b>	<b>\$412,715.00</b>

## Other Charges:

10/29/25	American Express - Airfare American Express - WARREN/KEVIN - DCA AUS - 10/28/2025 - 10/28/2025 - INV144441	-919.48
10/29/25	American Express - American Express - WARREN/KEVIN - BWI AUS - 10/28/2025 - 10/28/2025 - INV144873	673.48
10/29/25	American Express - Airfare American Express - SCHMELTZ III/VINCENT PAUL - BWI AUS - 10/28/2025 - 10/28/2025 - INV144889	673.48
10/30/25	American Express - American Express - TOPPING/CHARLES - Hotel - "HYATT PLACE AUSTIN DOWNTOWN, AUSTIN, TX" - INV144509	485.26
10/30/25	American Express - Travel Charges American Express - MATSOUKAS/KATHLEEN LEICHT - Fee - IND IAH IND - INV145287	35.00
10/30/25	American Express - Airfare American Express - SCHMELTZ III/VINCENT PAUL - AUS IAH ORD - 10/30/2025 - 10/30/2025 - INV145314	892.01
10/30/25	American Express - Airfare American Express - WARREN/KEVIN - AUS MDW - 10/29/2025 -	515.48

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## FIDUCIARY DUTY INVESTIGATION

	10/29/2025 - INV145104	
10/30/25	American Express - Airfare American Express - MATSOUKAS/KATHLEEN LEICHT - IND IAH IND - 11/2/2025 - 11/4/2025 - INV145287	1,038.63
11/01/25	American Express - American Express - WARREN/KEVIN - ORD IAH ORD - 11/2/2025 - 11/5/2025 - INV146040	39.76
11/01/25	American Express - American Express - WARREN/KEVIN - ORD IAH ORD - 11/2/2025 - 11/5/2025 - INV146040	967.20
11/03/25	Westlaw - Computerized Legal Research	404.93
11/03/25	Michael Nega - Michael Nega - Copy Services - Mastercard - JENN S COPY & BINDING - 10/29/2025 Copy of document. - 10/29/2025	384.29
11/04/25	Copying Charges	134.55
11/04/25	FedEx PS Ship - Fedex - Inv#905833645 - to Kathleen Murphy, Barnes & Thornburg LLP, CHICAGO, IL, US from Paige Lohse (Guest)	111.35
11/04/25	FedEx PS Ship - Fedex - Inv#905833645 - to Kathleen Murphy, Barnes & Thornburg LLP, CHICAGO, IL, US from Paige Lohse (Guest)	143.80
11/04/25	FedEx PS Ship - Fedex - Inv#905833645 - to Kathleen Murphy, Barnes & Thornburg LLP, CHICAGO, IL, US from Paige Lohse (Guest)	100.29
11/05/25	Copying Charges	110.10
11/05/25	Copying Charges	76.50
11/05/25	American Express - Travel Charges American Express - EATON/DAVID - Hotel - "LANCASTER HOTEL, HOUSTON, TX" - INVCONF# 590120786	1,639.53
11/05/25	Veritext LLC - Veritext LLC - Original transcript of Jonathan Cohn Inv Number: 8758350 10/31/2025	8,929.22
11/06/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Auston regarding Emergency Hearing on Rhodium in Austin, Texas Uber ride from 901 S. Mo Pac Expy, Austin, TX to 211 East 3rd St.,	43.28

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## FIDUCIARY DUTY INVESTIGATION

Austin, TX - 10/29/2025

11/06/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Auston regarding Emergency Hearing on Rhodium in Austin, Texas Uber ride from George Bush Intercontinental Airport (IAH), Houston, TX to 412 Main ST. Houston TX - 10/30/2025	65.45
11/06/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Auston regarding Emergency Hearing on Rhodium in Austin, Texas Uber ride from 211 East 3rd St., Austin, TX - to 3600 Presidential Blvd., Austin, TX - 10/30/2025	46.12
11/06/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Parking - Trip to Auston regarding Emergency Hearing on Rhodium in Austin, Texas Parking at O'Hare International Airport. from October 26, 2025 to October 30, 2025. - 10/30/2025	252.00
11/06/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Lodging - Trip to Auston regarding Emergency Hearing on Rhodium in Austin, Texas Hyatt Place, 211 East 3rd St., Austin, TX - 10/28/2025 - 10/30/2025	927.30
11/07/25	Kevin Warren - Kevin Warren - Taxi/Car Service - Hearing on LKC fee application - 11/03/2025	43.16
11/07/25	Kevin Warren - Kevin Warren - Taxi/Car Service - Hearing on LKC fee application - 11/04/2025	58.99
11/07/25	Kevin Warren - Kevin Warren - Taxi/Car Service - Travel for Depositions for LKC fee application Hearing - 10/29/2025	36.02
11/07/25	Kevin Warren - Kevin Warren - Taxi/Car Service - Travel for Depositions for LKC fee application Hearing - 10/20/2025	127.26
11/07/25	Kevin Warren - Kevin Warren - Taxi/Car Service - Travel for Depositions for LKC fee application Hearing - 10/23/2025	67.97
11/07/25	Kevin Warren - Kevin Warren - Taxi/Car Service - Travel for Depositions for LKC fee application	82.72

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## FIDUCIARY DUTY INVESTIGATION

Hearing - 10/27/2025

11/07/25	Kevin Warren - Kevin Warren - Lodging - Travel for Depositions for LKC fee application Hearing - 10/27/2025 - 10/28/2025	601.79
11/07/25	Anita Peterson - Anita Peterson - Lodging - Travel to Houston at request of Trace Schmeltz for Rhodium 2025-11-03 hearing. Conference Room 1008 11-01 – 11-05 (reserved under name of Catherine Lohse; paid by AWP) - 11/01/2025 - 11/05/2025	1,848.72
11/07/25	Anita Peterson - Anita Peterson - Copy Services - Travel to Houston at request of Trace Schmeltz for Rhodium 2025-11-03 hearing. Office Depot color copies - 11/03/2025	34.94
11/07/25	Anita Peterson - Anita Peterson - Copy Services - Travel to Houston at request of Trace Schmeltz for Rhodium 2025-11-03 hearing. Office Depot Hearing Supplies - 11/03/2025	206.21
11/10/25	Planet Depos LLC - Planet Depos LLC - Transcript of Mike Rosten Inv Number: 799819 11/03/2025	3,256.05
11/10/25	LAZ Karp Associates LLC dba LAZ Parking Texas LLC - LAZ Karp Associates LLC dba LAZ Parking Texas LLC - Parking validations for Deposition Inv Number: INV06704247 11/03/2025	40.00
11/11/25	Westlaw - Computerized Legal Research	6,472.63
11/11/25	Kathleen L. Matsoukas - Kathleen L. Matsoukas - Taxi/Car Service - Uber from airport to hotel - 11/02/2025	63.00
11/11/25	Kathleen L. Matsoukas - Kathleen L. Matsoukas - Parking - Airport parking - 11/04/2025	116.00
11/11/25	Kathleen L. Matsoukas - Kathleen L. Matsoukas - Taxi/Car Service - Uber from hotel to airport - 11/04/2025	65.89
11/11/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Flight from Chicago (ORD) airport to Washington D.C (DCA) Uber ride from Washington National Airport (DCA) Arlington, VA to 1700 Tysons	73.90

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## FIDUCIARY DUTY INVESTIGATION

Blvd, McLean, VA - 10/27/2025

11/11/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Flight from Chicago (ORD) airport to Washington D.C (DCA) - Flight Date - 10/26/2025 - From Chicago O'Hare (ORD) to Washington D. C. (DCA) - Transaction Date - 10/26/2025	708.48
11/11/25	Kathleen L. Matsoukas - Kathleen L. Matsoukas - Lodging - Hotel - lodging - 11/02/2025 - 11/04/2025	608.64
11/12/25	FedEx PS Ship - Courier Service Fedex - Inv#907659966 - to LAWRENCE MONTES, THE DOCUMENT GROUP, HOUSTON, TX, US from Kathleen Murphy	29.79
11/12/25	Paul T. Olszowka - Paul T. Olszowka - Hotel - Parking - Mastercard - THE LANCASTER HOTEL - 11/05/2025 - Witness Charles Blackmon Hotel Charges - 11/03/2025	125.58
11/12/25	The Document Group Inc - The Document Group Inc - Fees for a print job. Inv Number: 2110433 10/31/2025	4,197.77
11/13/25	Veritext LLC - Veritext LLC - Sealed Complete Transcript Inv Number: 8776097 11/07/2025	327.70
11/13/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Lodging - Trip to Washington DC for Depositions. JW Marriott Washington D. C. 1331 Pennsylvania Ave., Washington DC - 10/27/2025 - 10/28/2025	680.63
11/14/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Flight to Houston on Rhodium Uber ride from George Bush Intercontinental Airport (IAH), Houston, TX 77032, US to 701 Texas Ave, Houston, TX 77002, US - 11/02/2025	51.52
11/14/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Flight to Houston on Rhodium Uber ride from 2704 Navigation Blvd, Houston, TX 77003, US to 701 Texas Ave, Houston, TX 77002, US - 11/02/2025	45.78

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## FIDUCIARY DUTY INVESTIGATION

11/14/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Flight to Houston on Rhodium Uber ride from 701 Texas Ave, Houston, TX 77002, US to 2704 Navigation Blvd, Houston, TX 77003, US - 11/02/2025	44.57
11/14/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Houston on Rhodium Uber ride from 926 Maple Ave, Downers Grove, IL 60515, US to 10000 W O'Hare Ave, Des Plaines, IL 60666, US - 11/02/2025	93.98
11/14/25	US Messenger & Logistics Inc - US Messenger & Logistics Inc - Courier Services Inv Number: 2511-53726 10/31/2025	74.33
11/14/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Trip to Houston on Rhodium trial Flight from Houston, TX (IAH) airport to Indianapolis, IN (IND) airport - Flight Date - 11/04/2025 - Houston TX (IAH) to Indianapolis, IN (IND) airport - Transaction Date - 11/04/2025	1,411.18
11/14/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Lodging - Trip to Houston on Rhodium trial Lancaster Hotel 701 Texas Avenue Houston, TX 77002 - 11/02/2025 - 11/05/2025	1,997.19
11/18/25	Paul T. Olszowka - Paul T. Olszowka - Lodging - Mastercard - THE LANCASTER HOTEL - 11/05/2025 - Witness Charles Blackmon Hotel Charges - 11/02/2025 - 11/05/2025	986.67
11/18/25	Paul T. Olszowka - Paul T. Olszowka - Lodging - Mastercard - THE LANCASTER HOTEL - 11/05/2025 - Witness Chris Wheeler Hotel Expenses - 11/02/2025 - 11/05/2025	986.67
11/18/25	Paul T. Olszowka - Paul T. Olszowka - Lodging - Mastercard - THE LANCASTER HOTEL - 11/05/2025n - Witness Charles Topping Hotel Expenses - 11/02/2025 - 11/05/2025	986.67
11/19/25	Color Copies - Resource center	118.50
11/24/25	Kenneth Kansa - Kenneth Kansa - Taxi/Car Service - Attend disclosure statement hearing before Bankruptcy Court Uber from Court to	127.05

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## FIDUCIARY DUTY INVESTIGATION

Airport - 10/16/2025

11/24/25	Kenneth Kansa - Kenneth Kansa - Taxi/Car Service - Attend disclosure statement hearing before Bankruptcy Court Uber from Airport to Court - 10/15/2025	140.64
11/24/25	Kenneth Kansa - Kenneth Kansa - Parking - Attend disclosure statement hearing before Bankruptcy Court - 10/16/2025	43.00
11/24/25	FedEx PS Ship - Fedex - Inv#908491843 - to LAWRENCE MONTES, THE DOCUMENT GROUP, HOUSTON, TX, US from Anita Wenrick Peterson	62.80
11/24/25	FedEx PS Ship - Fedex - Inv#908491843 - to LAWRENCE MONTES, THE DOCUMENT GROUP, HOUSTON, TX, US from Anita Wenrick Peterson	91.59
11/24/25	FedEx PS Ship - Fedex - Inv#908491843 - to LAWRENCE MONTES, THE DOCUMENT GROUP, HOUSTON, TX, US from Anita Wenrick Peterson	79.08
11/24/25	FedEx PS Ship - Fedex - Inv#908491843 - to LAWRENCE MONTES, THE DOCUMENT GROUP, HOUSTON, TX, US from Anita Wenrick Peterson	69.30
11/24/25	FedEx PS Ship - Fedex - Inv#908491843 - to LAWRENCE MONTES, THE DOCUMENT GROUP, HOUSTON, TX, US from Anita Wenrick Peterson	95.37
11/24/25	FedEx PS Ship - Fedex - Inv#908491843 - to LAWRENCE MONTES, THE DOCUMENT GROUP, HOUSTON, TX, US from Anita Wenrick Peterson	62.80
11/24/25	FedEx PS Ship - Fedex - Inv#908491843 - to LAWRENCE MONTES, THE DOCUMENT GROUP, HOUSTON, TX, US from Anita Wenrick Peterson	95.37
11/24/25	Kenneth Kansa - Kenneth Kansa - Attend disclosure statement hearing before Bankruptcy Court - Flight Date - 10/15/2025 - Houston, TX - Transaction Date - 10/13/2025	996.96

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## FIDUCIARY DUTY INVESTIGATION

11/25/25	Emily Roberts - Emily Roberts - Office Supplies - Mastercard - IC INSTACART 1176 - 11/21/2025 Binders for the Rhodium hearing: Anita Peterson - 11/21/2025	22.63
11/25/25	E-Filing Court Documents - E-Filing documents with Court 11-25-2025	50.00
11/30/25	Veritext LLC - Veritext LLC - Fees for videographer re: Jonathan Cohn Inv Number: 8825923 11/26/2025	3,310.50
11/30/25	Everlaw Inc - Professional Services; Active Review - eDiscovery Hosting Services Subscription Fees 11-30-2025	2,548.00
11/30/25	Everlaw Inc - Professional Services; Early Case Assessment - eDiscovery Hosting Services Subscription Fees 11-30-2025	1,432.00
		\$ 53,667.52

**BARNES & THORNBURG** LLP

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Invoice 3517153

SPECIAL COMMITTEE OF THE BOARD OF  
DIRECTORS OF RHODIUM  
DAVID EATON  
251 LITTLE FALLS DRIVE  
WILMINGTON, DE 19808  
DAVIDEATON@RHDM.COM

December 29, 2025  
Trace (Vincent P.) Schmeltz  
00101065-00000001

PAYABLE UPON RECEIPT

Fees for Services	\$	412,715.00
Other Charges	\$	53,667.52
<b>Total This Invoice</b>	<b>\$</b>	<b>466,382.52</b>

REMITTANCE

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