

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> , ¹	§ § Case No. 24-90448 (ARP)
Debtors.	§ § Jointly Administered

**BARNES & THORNBURG LLP’S SIXTEENTH MONTHLY
FEE STATEMENT FOR THE PERIOD
DECEMBER 1, 2025, THROUGH DECEMBER 31, 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 December 1, 2025, through December 31, 2025, inclusive (the “Sixteenth Monthly Fee Statement”).

B&T seeks payment of interim compensation in the total amount of \$220,520.40 (80% of the services rendered), plus \$27,341.72 (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 Sixteenth

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



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)

and Morgan Soule (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);

Razmig Izakelian (razmigizakelian@quinnemanuel.com),

Alain Jaquet (alainjaquet@quinnemanuel.com),

and Joanna D. Caytas (joannacaytas@quinnemanuel.com),

700 Louisiana, Suite 3900,

Houston, Texas 77002

Debtors’ Financial Advisor, c/o Province

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

David Dunn (ddunn@provincefirm.com);

Kirsten Lee (klee@province.com);

and Andrew Popescu (apopescu@provincefirm.com),

2360 Corporate Circle, Suite 340,

Henderson, Nevada 89074

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

Ryan C. Wooten (rwooten@orrick.com)

609 Main, 40th Floor

Houston, Texas 77002

and Robert Trust (rtrust@orrick.com)

Mark Franke (mfranke@orrick.com)

and Brandon Batzel (bbatzel@orrick.com)

51 West 52nd Street

New York, New York 10019

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),
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 28th day of January 2026.

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
Email: cameronkelly@quinnemanuel.com
Email: alainjaquet@quinnemanuel.com

-and-

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

Email: KKansa@btlaw.com

Email: AGavant@btlaw.com

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

CERTIFICATE OF SERVICE

I certify that on January 28, 2026, 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**

Professional	Position With the Applicant	Year Admitted	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Trace (Vincent P.) Schmeltz	Partner	1997	Litigation	\$1,000.00	68.70	\$68,700.00
Kenneth Kansa	Partner	1999	Restructuring and Bankruptcy	\$1,325.00	40.50	\$53,662.50
Carrie M. Raver	Partner	1999	Litigation	\$1,045.00	2.40	\$2,508.00
Aaron Gavant	Partner	2009	Restructuring and Bankruptcy	\$950.00	2.30	\$2,185.00
Kathleen L. Matsoukas	Partner	2005	Litigation	\$970.00	11.60	\$11,252.00
Charlotte Underwood	Counsel	2014	Litigation	\$1,160.00	7.30	\$8,468.00
Ning He	Of Counsel	2016	Litigation	\$935.00	.30	\$280.50
Paige (Catherine) Lohse	Partner	2015	Litigation	\$795.00	107.20	\$85,224.00
Leah O'Farrell	Associate	2021	Restructuring and Bankruptcy	\$710.00	3.90	\$2,769.00
Haley Casper	Associate	2021	Litigation	\$675.00	0.40	\$270.00
Lydia Parks	Associate	2025	Litigation	\$530.00	1.30	\$689.00
Kevin Warren	Associate	2024	Litigation	\$530.00	4.60	\$2,438.00
Joseph Kipp	Associate Pending Bar Admission	N/A	Litigation	\$500.00	39.80	\$19,900.00
Anita Peterson	Paralegal	N/A	Litigation	\$445.00	13.60	\$6,052.00
Kathleen A. Murphy	Paralegal	N/A	Litigation	\$365.00	.20	\$73.00
Kelly Muenzing	Paralegal	N/A	Litigation	\$435.00	24.80	\$10,788.00
David Bartholomew	Graphic Artist	N/A	Litigation	\$315.00	.90	\$283.50
Christopher Long	Discovery Solutions Project Analyst	N/A	Legal Operations	\$270.00	.40	\$108.00
Total					330.20	\$275,650.50

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

Date	Expense	Amount
11/30/2025	Pacer Court Filing System Charges 11/01/2025 – 11/30/2025	\$3.00
12/02/2025	Copying Charges	\$203.85
12/02/2025	T. Schmeltz Flight Round Trip ORD to IAH 12/01/2025	\$1,221.00
12/02/2025	Color Copies	\$112.50
12/03/2025	Court Reporters Clearinghouse Inc – Depositions Fees Inv Number 210010 – 10/31/2025	\$879.18
12/04/2025	FedEx Inv#910155424	\$114.67
12/04/2025	FedEx Inv#910155424	\$154.31
12/04/2025	FedEx Inv#910155424	\$124.78
12/04/2025	FedEx Inv#910155424	\$160.31
12/04/2025	Court Reporters Clearinghouse Inc – Depositions Fees Inv Number 210013 – 10/31/2025	\$1,034.91
12/08/2025	P. Lohse Uber from Airport to House 12/04/2025	\$68.98
12/08/2025	T. Schmeltz Uber from Dinner to Hotel 12/03/2025	\$43.15
12/08/2025	T. Schmeltz Uber Cancellation Fee 12/03/2025	\$5.23
12/08/2025	T. Schmeltz Uber to Airport 12/01/2025	\$76.11
12/08/2025	T. Schmeltz Uber from Airport 12/04/2025	\$98.36
12/08/2025	T. Schmeltz Uber from Airport to Hotel 12/02/2025	\$76.74
12/08/2025	T. Schmeltz Uber from Hotel to Airport 12/04/2025	\$71.57
12/08/2025	T. Schmeltz Uber to Dinner 12/01/2025	\$21.16
12/08/2025	P. Lohse Uber from Airport to Hotel 11/30/2025	\$57.18
12/08/2025	T. Schmeltz Uber from Hotel to Dinner 12/03/2025	\$18.87
12/08/2025	P. Lohse Uber from Hotel to Airport 12/04/2025	\$79.65
12/08/2025	P. Lohse Uber from Home to Airport 11/30/2025	\$72.43
12/08/2025	P. Lohse Flight to IAH 11/30/2025	\$508.95
12/08/2025	P. Lohse Flight to ORD 12/04/2025	\$258.25
12/08/2025	T. Schmeltz Lodging JW Marriott 12/01/2025 – 12/04/2025	\$1,833.02
12/08/2025	P. Lohse Lodging 11/30/2025 - 12/04/2025	\$1,730.43
12/08/2025	P. Lohse Lodging – Conference Room 11/30/2025 – 12/04/2025	\$2,715.81
12/09/2025	E-Filing Court Documents	\$50.00
12/10/2025	P. Lohse Uber from Airport to Hotel 11/02/2025	\$63.24
12/10/2025	P. Lohse Uber from Hotel to Airport 11/4/2025	\$67.83
12/10/2025	P. Lohse Flight to IAH 11/04/2025	\$286.42
12/10/2025	P. Lohse Flight to ORD 11/04/2025	\$93.51
12/10/2025	P. Lohse Flight to ORD 11/04/2025	\$486.64
12/10/2025	P. Lohse Lodging 11/02/2025 – 11/05/2025	\$1,028.79
12/10/2025	Mastercard – C. Wheeler Lodging Houstonian Hotel 12/02/2025 – 12/04/2025	\$1,144.31
12/10/2025	P. Lohse – Computer Supplies	\$108.25

12/11/2025	Veritext LLC – Audio Transcription Inv Number: 8837230 – 12/03/2025	\$65.70
12/12/2025	E-Filing Court Documents	\$50.00
12/15/2025	K. Kansa Uber from Airport to Hotel 12/02/2025	\$95.49
12/15/2025	K. Kansa Parking at Airport 12/04/2025	\$129.00
12/15/2025	K. Kansa Uber from Hotel to Airport 12/03/2025	\$163.10
12/15/2025	Veritext LLC – Transcript of Hearing Inv Number: 8861024 – 12/11/2025	\$334.95
12/15/2025	K. Kansa Flight Round Trip from ORD to IAH 12/01/2025	\$1,026.97
12/15/2025	Mastercard – C. Blackmon Lodging JW Marriott Houston 12/02/2025 – 12/04/2025	\$1,052.98
12/15/2025	K. Kansa Lodging 12/01/2025 – 12/04/2025	\$1,441.62
12/15/2025	Mastercard – Witness Lodging JW Marriott Houston 12/01/2025 – 12/04/2025	\$1,564.47
12/16/2025	T. Schmeltz Flight Round Trip from ORD to IAH and STL to ORD 12/17/2025 – 12/18/2025	\$811.44
12/18/2025	P. Lohse Uber from Office to Home 12/16/2025	\$28.48
12/22/2025	Copying Charges	\$208.35
12/22/2025	Veritext LLC – Audio Transcription Inv Number: 8870182 – 12/15/2025	\$262.80
12/23/2025	Mastercard – C. Blackman Lodging JW Marriott Houston 12/01/2025 – 12/04/2025	\$1,052.98
12/31/2025	Everlaw Inc – Professional Services; Active Review – eDiscovery Hosting Services Subscription Fees	\$2,548.00
12/31/2025	Everlaw Inc – Professional Services; Early Case Assessment – eDiscovery Hosting Services Subscription Fees	\$1,432.00
Total		\$27,341.72

EXHIBIT C

BARNES & THORNBURG LLP

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

Invoice 3525518

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

January 16, 2026
Trace (Vincent P.) Schmeltz
00101065-00000001

PAYABLE UPON RECEIPT

Fees for Services	\$	275,650.50
Other Charges	\$	27,341.72
Total This Invoice	\$	302,992.22

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 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

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Invoice 3525518

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January 16, 2026
Trace (Vincent P.) Schmeltz
00101065-00000001

PAYABLE UPON RECEIPT

00101065-00000001

FIDUCIARY DUTY INVESTIGATION

For legal services rendered in connection with the above matter for the period ending December 31, 2025 as described on the attached detail.

Fees for Services	\$	275,650.50
Other Charges	\$	<u>27,341.72</u>
Total This Invoice	\$	302,992.22

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Summary of Invoice

Date	Name	Description	Hours	Amount
12/01/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-12-03 hearing including hearing logistics (3.5); review as-filed 2025-12-01 (Dkt 2071) Order Allowing Interim Compensation and Reimbursement of Expenses (Docket No. 1958) (.2); communications with K. Kansa and L. Parks regarding same (.2); communications with Quinn Emanuel regarding same (.2); communications with clients 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).	4.60	2,047.00
12/01/25	Christopher Long	Upload data into database for review.	0.40	108.00
12/01/25	Lydia Parks	Review the Order allowing BT's interim compensation and reimbursement of expenses.	0.10	53.00
12/01/25	Charlotte Underwood	Review exhibits to confirmation briefing (.1); communications with K. Kansa regarding the same (.5); process SAFE AHG discovery (.1); communications with team regarding D&O settlement (.1).	0.80	928.00
12/01/25	Leah O'Farrell	Review and respond to A. Peterson regarding exhibit list trackers for LKC dispute.	0.10	71.00
12/01/25	Leah O'Farrell	Draft memorandum on research regarding success fee.	0.40	284.00
12/01/25	Leah O'Farrell	Call with P. Lohse regarding LKC objection to plan and current draft of reply.	0.20	142.00
12/01/25	Leah O'Farrell	Review email regarding LKC language from K. Kansa (.1); call with P. Lohse regarding same (.1).	0.20	142.00
12/01/25	Leah O'Farrell	Draft language regarding negotiations with LKC for reply.	0.10	71.00
12/01/25	Leah O'Farrell	Review LKC language regarding releasing parties.	0.20	142.00
12/01/25	Leah O'Farrell	Review emails regarding language to resolve	0.30	213.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		LKC dispute (.1); call with P. Lohse regarding not filing reply to LKC objection (.2).		
12/01/25	Kenneth Kansa	Email to D. Eaton and T. Schmeltz on revisions to Eaton Declaration (.2); review Eaton Declaration (.2); t/c D. Eaton on same (.1); email to C. Underwood on same (.1); revise Eaton Declaration (.2); email to Akin team on revisions to Eaton Declaration (.2); further emails to C. Underwood on Eaton Declaration (.2); review and revise substantial contribution section of confirmation brief (.9); review additional sections of confirmation brief (.6); email to Akin team on same (.1); email to C. Underwood on same (.1); email to T. Schmeltz on Eaton Declaration (.1); email to BT team on order regarding 4th interim fee app (.1); emails to T. Schmeltz and D. Eaton on Akin requested revisions to Eaton Declaration (.3); revise Eaton Declaration (.3); t/c S. Schultz on same (.2); review further revisions to Eaton Declaration (.3); review M. Hurley email on Eaton Declaration (.1); further t/c with S. Schultz on Eaton Declaration (.4); email to Akin team on Eaton Declaration (.1); email to Quinn team on same (.1); review Akin further changes to confirmation brief (.4); email to C. Underwood on same (.1); revise confirmation brief (.5); email to Akin team on same (.1); emails to R. Izakelian on document revisions (.2); email to BT team on LKC proposal (.1); emails to Quinn and Akin teams on finalizing confirmation brief (.4); review of plan-related documents, Eaton Declaration, and confirmation brief in preparation for confirmation hearing (1.5); participate in Transcend/Riveron call (.5).	8.70	11,527.50
12/01/25	Paige Lohse	Preparations for hearing on LKC fee dispute (9.0); continue to analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.7); strategize in response to LKC plan objection (.8); call with T. Schmeltz to discuss strategy (.4); multiple calls with L. O'Farrell regarding LKC objection to plan (.4); further call with L. O'Farrell regarding LKC	11.40	9,063.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		language from K. Kansa (.1).		
12/01/25	Trace (Vincent P.) Schmeltz	Call with M. Hurley regarding strategy and next steps (.2); call with D. Eaton regarding the same (.1); discuss strategy with P. Lohse (.4); communications with K. Kansa regarding plan confirmation issues (.1); review plan confirmation documents (.8); prepare D. Eaton for testimony (2.7); outline examinations (1.3).	5.60	5,600.00
12/01/25	Carrie M. Raver	Address settlement payment issues.	0.50	522.50
12/02/25	Joseph Kipp	Facilitate trial exhibit preparation (1.8); research Fifth Circuit caselaw discussing the admission of rebuttal and impeachment evidence (2.5); prepare memo summarizing research findings and synthesizing with relevant facts (.5).	4.80	2,400.00
12/02/25	Anita Peterson	Communications with United States Trustee regarding 2025-12-01 (Dkt 2071) Order Allowing Interim Compensation and Reimbursement of Expenses (Docket No. 1958) (.2); assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-12-03 hearing including hearing logistics (.4); communication with investigative team regarding monthly fee application (.2); communication with K. Kansa regarding same (.1); review communications with Porter Hedges regarding confirmation brief (.1); review as-filed 2025-12-01 (Dkt 2088) Plan Proponents' Memorandum of Law in Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Liquidation and assist attorneys in executing strategy per request of P. Lohse (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	1.50	667.50
12/02/25	Charlotte Underwood	Communications with team regarding plan confirmation hearing and LKC hearing.	0.30	348.00
12/02/25	Paige Lohse	Preparations for hearing on LKC fee dispute.	16.60	13,197.00
12/02/25	Kenneth Kansa	Call with S. Schultz on confirmation hearing prep (.1); t/c T. Schmeltz on same (.1); preparation session at Akin Houston offices in advance of confirmation, including numerous	12.30	16,297.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		conferences with C. Topping, SAFE AHG, D. Eaton, T. Schmeltz, and others (5.2); meeting at Quinn Houston offices with Debtors, SAFE AHG, and counsel on plan confirmation preparations (2.1); o/c with C. Topping, S. Schultz, M. Hurley on revisions to Plan Administrator Agreement (.4); email to Debtors on same (.1); review agenda for confirmation hearing (.1); email to P. Tomasco on same (.1); review and revise exhibit list (.2); email to Quinn team on same (.1); draft email memo to C. Topping on resolution of C. VanZoeren objection to confirmation (.2); t/c S. Schultz and L. Weber on resolution of C. VanZoeren objection (.2); email to P. Lohse on confirmation brief (.1); emails to Quinn and Akin teams on retained causes of action (.2); review further drafts of confirmation order (.3); emails to A. Jaquet on same (.1); emails to A. Jaquet on notice of amended plan supplement (.2); email to C. Topping on amended Plan supplement (.1); review LKC materials to address objection at confirmation hearing (2.4).		
12/02/25	Haley Casper	Evaluate documents produced in furtherance of hearing (.3); communicate internally regarding same (.1).	0.40	270.00
12/02/25	Kevin Warren	Supplement D. Eaton outline with trial exhibits to assist T. Schmeltz and P. Lohse in preparing for continued hearing on LKC fee application (1.5); assist P. Lohse in identifying other trial exhibits, along with documents within the production, to prepare for the same (2.6).	4.10	2,173.00
12/02/25	Trace (Vincent P.) Schmeltz	Revise D. Eaton outline (2.4); call with K. Kansa regarding hearing prep (.1); prepare D. Eaton for trial testimony (3.2); work with Akin Gump and Quinn Emanuel on plan confirmation issues (3.9); prepare K. Hays for trial testimony (2.9); draft closing argument (1.4); consult with C. Potter on strategy (.3); review and respond to e-mails about various aspects of confirmation and LKC trial (.4).	14.60	14,600.00
12/02/25	Carrie M. Raver	Address tail coverage issues.	0.20	209.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
12/03/25	Joseph Kipp	Compile trial exhibits and factual materials for use at LKC hearing.	0.90	450.00
12/03/25	Leah O'Farrell	Finish draft memorandum on altering success fee.	0.70	497.00
12/03/25	Leah O'Farrell	Review objection regarding Porter Hedges fees per request from P. Lohse.	0.10	71.00
12/03/25	Aaron Gavant	Review confirmation brief (.8); follow up communications relating to same (.1); communications with K. Kansa regarding confirmation hearing (.1).	1.00	950.00
12/03/25	Leah O'Farrell	Review inquiry from P. Lohse regarding board minutes.	0.10	71.00
12/03/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-12-03 hearing (.8); review communications with BDO regarding final fee application and assist attorneys in executing strategy per request of N. He (.2); review incoming transcript from 2025-11-25 hearing and assist attorneys in executing strategy per request of P. Lohse (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3); review incoming 2025-11-30 (Dkt 2061) Stipulation and Agreed Order re Production and Use of Mediation-Related Documents and Communications, 2025-12-01 (Dkt 2064) Notice of Filing Supplemental Exhibit, 2025-12-03 (Dkt 2115) Courtroom Minutes and assist attorneys in executing strategy per request of P. Lohse (.3).	1.80	801.00
12/03/25	Kenneth Kansa	Prepare for (1.5) and participate in (2.0) morning session of confirmation hearing; participate in breakout sessions before afternoon resumption of confirmation hearing (.7); participate in afternoon session of confirmation hearing (.5); participate in breakout sessions regarding same and LKC hearing (.6); follow up discussions with Company and Plan Proponents on confirmation hearing (.6); email to C. Underwood on confirmation hearing (.1);	8.20	10,865.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		email to C. Raver on same (.1); t/c C. Raver on confirmation hearing and conference with insurers (.3); t/c C. Underwood on confirmation hearing (.3); t/c to A. Gavant on confirmation hearing (.1); review emails on C. VanZoeren settlement (.3); review of follow up materials from confirmation hearing and identify progress points to emergence (1.1).		
12/03/25	Paige Lohse	Prepare for hearing on LKC fee dispute (6.3); attend hearing on LKC fee dispute (4.0).	10.30	8,188.50
12/03/25	Charlotte Underwood	Call with K. Kansa regarding confirmation hearing (.3); follow up regarding plan confirmation hearing (.3).	0.60	696.00
12/03/25	Carrie M. Raver	Address plan confirmation issues.	0.20	209.00
12/03/25	Carrie M. Raver	Discuss plan confirmation hearing issues with K. Kansa and what information to convey to the insurers.	0.30	313.50
12/03/25	Kevin Warren	Assist T. Schmeltz and P. Lohse in locating certain trial exhibits to prepare for LKC fee application hearing.	0.50	265.00
12/03/25	Trace (Vincent P.) Schmeltz	Prepare for LKC trial (2.2); prepare for plan confirmation (1.8); attend and participate in plan confirmation hearing (2.5); participate in breakout session before afternoon resumption of confirmation hearing (.7); participate in breakout session after confirmation hearing to discuss confirmation hearing and LKC hearing (.6); conduct LKC hearing (4.0).	11.80	11,800.00
12/04/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on follow up from 2025-12-03 hearing including logistics (1.5); review incoming 2025-12-04 (Dkt 2122) PDF with attached Audio File for 2025-12-03 hearing and assist attorneys in executing strategy per request of P. Lohse (.2); review fee application materials and assist attorneys in executing strategy per request of T. Schmeltz (.2); review incoming 2025-12-04 (Dkt 2125) Amended Joint Exhibit List for Hearings Scheduled for December 3, 2025 and assist attorneys in executing strategy per request of P. Lohse (.2).	2.10	934.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
12/04/25	Aaron Gavant	Review plan confirmation status (.3); multiple communications with BT team regarding same (.2).	0.50	475.00
12/04/25	Kelly Muenzing	Assist attorneys in executing strategy per request of T. Schmeltz regarding LKC issues.	0.20	87.00
12/04/25	Kenneth Kansa	Review revisions to C. VanZoeren agreement (.3); emails to S. Schultz on same (.1); review revised exhibit list (.1); email to R. Izakelian on same (.1); review C. Raver email on insurers (.1).	0.70	927.50
12/04/25	Carrie M. Raver	Address plan confirmation hearing issues with insurers.	0.20	209.00
12/04/25	Trace (Vincent P.) Schmeltz	Discuss strategy with C. Topping, especially around privilege questions (1.6); contemplate next steps and closing (2.3).	3.90	3,900.00
12/05/25	Kelly Muenzing	Execute strategy focusing on detailed tracking and timely updates of documents to iManage Work for attorney use (.1); assist attorneys in executing strategy per request of P. Lohse regarding file sharing (.1); communications with D. Eaton regarding same (.1).	0.30	130.50
12/05/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on follow up from 2025-12-03 hearing including logistics.	0.80	356.00
12/05/25	Kenneth Kansa	Review C. VanZoeren release sent by S. Schultz (.3); email to S. Schultz on same (.1).	0.40	530.00
12/05/25	Paige Lohse	Follow up from hearing on LKC fee dispute (1.2); call with T. Schmeltz regarding same (.4); analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (1.3).	2.90	2,305.50
12/05/25	Trace (Vincent P.) Schmeltz	Call with team regarding privilege (.5); call with P. Lohse to discuss LKC next steps (particularly on closing slides) (.4); review and respond to e-mails on LKC issues (.4); call with M. Hurley regarding LKC hearing (.2); call with B. Funk and S. Schultz regarding same (.2); call with W. Thompson regarding privilege (.1).	1.80	1,800.00
12/08/25	Joseph Kipp	Assist with LKC hearing preparation.	0.50	250.00
12/08/25	Kenneth Kansa	Office conference with K. Muenzing on fee	0.10	132.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		application.		
12/08/25	Anita Peterson	Communications with K. Muenzing regarding monthly fee statement, interim fee application (.2); precise tracking and timely updates of deadlines (.2).	0.40	178.00
12/08/25	Kelly Muenzing	Review correspondence from T. Schmeltz and A. Peterson (.1); call with internal team regarding monthly fee statement (.3); assist attorneys in executing strategy per request of P. Lohse regarding hearing preparation (.9); review and revise monthly fee statement per request of T. Schmeltz (2.0); correspondence with T. Schmeltz regarding same (.1); correspond with K. Kansa regarding same (.1); confer with K. Kansa regarding same (.1).	3.60	1,566.00
12/08/25	Paige Lohse	Prepare for hearing on LKC fee dispute (3.5); analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.2).	3.70	2,941.50
12/08/25	Trace (Vincent P.) Schmeltz	Calls with D. Eaton on confirmation hearing follow up (.5); work with D. Eaton on trial testimony (1.3); calls and e-mails with M. Hurley regarding trial (.4); revise trial outline (.6); work on closing outline (.8).	3.60	3,600.00
12/09/25	Joseph Kipp	Prepare and file notice to use remote testimony at LKC hearing (.8); prepare and file transcript request form for December 3 hearing (.2).	1.00	500.00
12/09/25	Kelly Muenzing	Review and revise monthly fee statement spreadsheet (3.7); communications with timekeepers regarding same (.1); communications with T. Schmeltz regarding same (.1).	3.90	1,696.50
12/09/25	Leah O'Farrell	Attention to inquiry from J. Kipp regarding remote testimony of D. Eaton.	0.30	213.00
12/09/25	Aaron Gavant	Communications with BT team regarding matter status and next steps.	0.30	285.00
12/09/25	Paige Lohse	Prepare for hearing on LKC fee dispute (4.6); analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.4).	5.00	3,975.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
12/09/25	Trace (Vincent P.) Schmeltz	Revise Eaton outline in light of feedback from SAFE AHG (2.0); confer with C. Potter on Eaton testimony (.4); make further revisions to Eaton outline based on C. Potter feedback (.3).	2.70	2,700.00
12/10/25	Joseph Kipp	Research Fifth Circuit caselaw regarding corporate witnesses and hearsay exceptions (3.4); produce summaries regarding same (.8).	4.20	2,100.00
12/10/25	Leah O'Farrell	Draft amended notice of remote testimony (.2); revise amended notice per edits from P. Lohse and coordinate filing of same (.1).	0.30	213.00
12/10/25	Kelly Muenzing	Review and revise monthly fee statement (3.2); correspondence with T. Schmeltz regarding same (.2); correspondence with K. Kansa regarding same (.1).	3.50	1,522.50
12/10/25	Paige Lohse	Prepare for hearing on LKC fee dispute (9.8); analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.4).	10.20	8,109.00
12/10/25	Carrie M. Raver	Participate in call with C. Topping and broker personnel regarding further extension of insurance policies.	0.20	209.00
12/10/25	Trace (Vincent P.) Schmeltz	Call with D. Eaton and M. Robinson on hearing preparation (.4); revise outline of D. Eaton testimony (.7); work with D. Eaton to prepare for trial testimony (4.6); call with K. Hays regarding trial testimony (.1); communications with team regarding tax allocation (.4); call with C. Topping regarding insurance policies (.2).	6.40	6,400.00
12/11/25	Joseph Kipp	Extract testimony from hearing transcripts for use in closing argument.	3.90	1,950.00
12/11/25	Kelly Muenzing	Communications with P. Lohse and A. Peterson regarding hearing logistics (.1); review and revise exhibits to monthly fee statement (.4); precise tracking and timely updates of deadlines (.2).	0.70	304.50
12/11/25	Leah O'Farrell	Confirm exhibit trackers are up to date for LKC continued hearing (.5); pull topics from transcripts per request from P. Lohse (.3).	0.80	568.00
12/11/25	Leah O'Farrell	Attention to email from J. Kipp regarding ex. 208 and respond with clarification.	0.10	71.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
12/11/25	Paige Lohse	Prepare for hearing on LKC fee dispute (3.6); attend hearing (1.2); analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.3); follow up based on the hearing (2.2).	7.30	5,803.50
12/11/25	Anita Peterson	Assist attorneys in executing strategy per request of Paige Lohse focusing on preparation for 2025-12-11 hearing (1.4); review communication with Quinn Emanuel regarding materials from 2025-12-03 hearing (.2); detailed tracking and timely updates of documents to iManage Work and Teams platforms for attorney use (.2).	1.80	801.00
12/11/25	Ning He	Analyze documents regarding fee dispute.	0.30	280.50
12/11/25	Trace (Vincent P.) Schmeltz	Prepare for LKC fee application hearing (4.7); attend same (1.2).	5.90	5,900.00
12/11/25	David Bartholomew	Review documents and materials from P. Lohse (.3); draft and develop slides on 2025 Engagement Letter for Closing Arguments presentation (.5); circulate proofs regarding same (.1).	0.90	283.50
12/11/25	Kathleen A. Murphy	Bates label documents and forward same to P. Lohse.	0.20	73.00
12/12/25	Joseph Kipp	Analyze and compile exhibits to be used in proffer (2.2); confer with P. Lohse regarding proffer drafting strategy (.5); draft evidentiary proffer regarding trial testimony and Board minutes (6.7).	9.40	4,700.00
12/12/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.2); call with J. Kipp regarding proffer draft (.5); continue follow up based on the hearing (.3).	1.00	795.00
12/12/25	Kelly Muenzing	Correspondence with P. Lohse regarding upcoming hearing logistics.	0.10	43.50
12/13/25	Paige Lohse	Prepare for hearing on LKC fee dispute (.4); continue follow up based on the hearing (3.1).	3.50	2,782.50
12/14/25	Paige Lohse	Continue follow up on LKC dispute based on the hearing.	6.70	5,326.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
12/14/25	Kenneth Kansa	Review incoming pleadings (.4); review emails on LKC action (.2); review fee application materials (in part) (.6).	1.20	1,590.00
12/14/25	Trace (Vincent P.) Schmeltz	Work on next steps in trial and closing.	1.20	1,200.00
12/15/25	Joseph Kipp	Extract key testimony from hearing transcripts for use in closing argument (2.4); research Fifth Circuit caselaw regarding Rule 30(b)(6) testimony for proffer draft (1.9); compile and format exhibits for proffer (1.8); revise proffer and incorporate feedback (.4).	6.50	3,250.00
12/15/25	Paige Lohse	Prepare for hearing on LKC fee dispute (2.5); continue follow up based on the hearing (4.2).	6.70	5,326.50
12/15/25	Kelly Muenzing	Correspondence with K. Kansa regarding monthly fee statement.	0.10	43.50
12/15/25	Trace (Vincent P.) Schmeltz	Prepare closing slides (revise Paige's draft and suggest new slides) (1.8); revise proffer (.8).	2.60	2,600.00
12/16/25	Kathleen L. Matsoukas	Multiple communications with T. Schmeltz regarding strategy and content for response to LKC's brief in response to Amended Wheeler Declaration (.5); communicate with J. Kipp and P. Lohse regarding background facts for response (.8); draft and revise response in opposition to LKC's response to Amended Wheeler Declaration and in furtherance of limited objection (5.8); review documents and pleadings in connection with same (2.1); communicate with C. Topping regarding draft response (.1).	9.30	9,021.00
12/16/25	Joseph Kipp	Extract citations from docket briefs for use in response brief to LKC filing (2.5); revise evidentiary proffer (1.0); research Fifth Circuit caselaw regarding absolute privilege for statements made in judicial proceedings (.2); analyze Wheeler declarations and extract quotes for use in brief (.6); analyze arbitration transcript and pull testimony for use in brief (1.2); revise and provide citations to brief (1.5).	7.00	3,500.00
12/16/25	Paige Lohse	Prepare for hearing on LKC fee dispute (8.9); continue follow up based on the hearing (1.9).	10.80	8,586.00
12/16/25	Kelly Muenzing	Review and revise monthly fee statement (1.2);	1.60	696.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		correspondence to K. Kansa regarding same (.1); confer with K. Kansa regarding same (.1); prepare file stamped copies of Special Committee's Proffer to Admit Evidence (.1); correspond with Client regarding same (.1).		
12/16/25	Trace (Vincent P.) Schmeltz	Prepare for closing arguments on LKC hearing (2.6); revise proffer (.9).	3.50	3,500.00
12/16/25	Kenneth Kansa	Office conference with K. Muenzing on fee application (.1); review incoming pleadings (.1).	0.20	265.00
12/16/25	Carrie M. Raver	Address insurance extension issues.	0.20	209.00
12/17/25	Joseph Kipp	Revise LKC response brief (1.0); analyze LKC response to Special Committee's proffer (.3).	1.30	650.00
12/17/25	Charlotte Underwood	Communications with team regarding court ruling regarding plan and LKC.	0.30	348.00
12/17/25	Joseph Kipp	Facilitate transmission of Special Committee hearing exhibits to counsel for SAFEs.	0.30	150.00
12/17/25	Paige Lohse	Prepare for hearing on LKC fee dispute (6.0); attend hearing on LKC dispute(1.9); analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (.5).	8.40	6,678.00
12/17/25	Kathleen L. Matsoukas	Further revise and finalize brief in response to LKC brief for filing (1.4); communicate with T. Schmeltz regarding same (.2); communicate with P. Lohse and J. Kipp regarding same (.4); communicate with C. Topping regarding same (.3).	2.30	2,231.00
12/17/25	Aaron Gavant	Review developments on confirmation and LKC ruling (.2); communications with BT team regarding same (.3).	0.50	475.00
12/17/25	Kelly Muenzing	Assist attorneys in executing strategy per request of P. Lohse regarding special committee hearing exhibits (.2); communications with J. Kipp regarding same (.1).	0.30	130.50
12/17/25	Kenneth Kansa	Communications with BT team on confirmation of Plan and outcome of LKC hearing (.3); email to N. He on BDO fee application (.1); t/c A. Popescu on professional fee reserve (.1); review incoming pleadings (.2).	0.70	927.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
12/17/25	Trace (Vincent P.) Schmeltz	Prepare for (3.2) and attend (1.9) closing at LKC hearing.	5.10	5,100.00
12/17/25	Carrie M. Raver	Evaluate correspondence about further extension of policies.	0.20	209.00
12/18/25	Kelly Muenzing	Review and revise monthly fee statement (.8); correspondence with internal team regarding same (.1); assist attorneys in executing strategy per request of P. Lohse regarding special committee hearing exhibits (.4).	1.30	565.50
12/18/25	Lydia Parks	Identify and briefly review the Kirkland invoices requested by the SAFEs (.4); transmit materials regarding same (.2).	0.60	318.00
12/18/25	Kenneth Kansa	T/c with C. Raver on status with insurers and tail coverage (.1); review C. Underwood email on same (.1).	0.20	265.00
12/18/25	Carrie M. Raver	Address plan confirmation and payment issues.	0.20	209.00
12/18/25	Carrie M. Raver	Address policy extension issues (.1); call with K. Kansa regarding same (.1).	0.20	209.00
12/19/25	Kelly Muenzing	Communications with internal team regarding monthly fee statement (.2); assist attorneys in executing strategy per request of P. Lohse regarding file sharing logistics (.3).	0.50	217.50
12/19/25	Kenneth Kansa	Review revised confirmation order (.1); review emails on same and admin claims bar date (.1).	0.20	265.00
12/21/25	Kenneth Kansa	Email team on entry of confirmation order.	0.10	132.50
12/21/25	Kelly Muenzing	Review and revise monthly fee statement (1.4); communications with internal team regarding same (.1).	1.50	652.50
12/22/25	Charlotte Underwood	Compiling information for fee application and coordinating on Province information request.	1.00	1,160.00
12/22/25	Anita Peterson	Assist attorneys in executing strategy per request of C. Underwood focusing on remaining professional fees.	0.60	267.00
12/22/25	Kenneth Kansa	Review Verita escrow agreement (.3); email to A. Popescu on same (.1); review emails on same (.1).	0.50	662.50
12/22/25	Kelly Muenzing	Review and revise monthly fee statement (.3); correspondence with T. Schmeltz regarding	0.80	348.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		same (.1); review docketing reminders to manage and track all upcoming deadlines (.1); communications with C. Underwood regarding monthly fee statement (.3).		
12/23/25	Kenneth Kansa	Review emails on professional fee escrow (.1); review emails on confirmation order (.2).	0.30	397.50
12/23/25	Kelly Muenzing	Communications with internal team regarding monthly fee statement.	0.10	43.50
12/24/25	Kenneth Kansa	Review C. Underwood email on document demand from plan administrator-designate (.1); email to C. Underwood on same (.1); review further emails on same (.2); review plan materials on same (.2).	0.60	795.00
12/26/25	Charlotte Underwood	Review plan administrator agreement (.7); confer with team regarding the same and data transfer request (.5).	1.20	1,392.00
12/26/25	Paige Lohse	Analyze and prepare for response to and conferrals with SAFEs regarding document request (.5); confer with BT team regarding same (.5).	1.00	795.00
12/26/25	Kenneth Kansa	Participate in BT team call on plan administrator document requests (.5); emails to Special Committee and BT teams on call (.2); email to D. Eaton on document requests (.1); email to C. Underwood on plan administrator agreement (.1); t/c D. Eaton on document requests (.1); review Akin email on same (.1); review C. Underwood summary of plan administrator agreement on documents (.2).	1.30	1,722.50
12/28/25	Charlotte Underwood	Meet and confer with SAFE AHG regarding plan administrator request (.5); related follow up (1.0).	1.50	1,740.00
12/28/25	Paige Lohse	Further prepare for conferral with SAFEs (.3); conferral with SAFEs on document requests (.5); follow up from conferral (.2).	1.00	795.00
12/28/25	Kenneth Kansa	Email to C. Underwood and P. Lohse on plan requirements regarding document transfer in advance of call with SAFE team (.5); review C. Underwood email on same (.1); email to C. Underwood on same (.1); emails to/from C. Topping on plan effectiveness preparations and	1.40	1,855.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		call (.2); review C. Topping email on Plan effectiveness preparations (.2); review emails on document transfer (.2); review C. Underwood draft email on same and email to C. Underwood on same (.1).		
12/29/25	Charlotte Underwood	Respond to document request from Plan Administrator.	0.40	464.00
12/29/25	Kelly Muenzing	Review and revise monthly fee statement (.9); communications with internal team regarding same (.2); draft Barnes & Thornburg LLP's Fifteenth Monthly Fee Statement and corresponding exhibits (3.2); communications with K. Kansa regarding same (.2); communications with Quinn Emanuel regarding Monthly Fee Statement filing (.2).	4.70	2,044.50
12/29/25	Kenneth Kansa	Call with C. Topping, Quinn, and Province on effective date (1.0); draft update email to T. Schmeltz and C. Underwood on same (.3); follow up email to C. Underwood on same (.1); t/c D. Eaton on indemnification question (.1); email to C. Underwood on Province inquiry (.1); emails to A. Popescu on open points for effective date (.1); review monthly fee statement draft (.1); email to K. Muenzing on same (.1).	1.90	2,517.50
12/30/25	Charlotte Underwood	Respond to plan administrator document request.	1.10	1,276.00
12/30/25	Kelly Muenzing	Finalize BT's Fifteenth Monthly Fee Statement and corresponding exhibits (.7); communications with Quinn Emanuel regarding same with Ledes data for filing (.1); review previously filed 2025-11-04 (Dkt 1958) BT's Fourth Interim Fee Application (.2); communications with L. Parks regarding same (.1).	1.10	478.50
12/30/25	Kenneth Kansa	Participate in Rhodium pre-Effective Date call with C. Topping, Debtors, and Province team.	0.50	662.50
12/30/25	Paige Lohse	Preparations for responding to SAFE document requests.	0.70	556.50
12/30/25	Lydia Parks	Outline the process for the interim fee application for K. Muenzing ahead of the fifth application due January 2026 (.5); connect with	0.60	318.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		K. Kansa regarding the fee application given the plan confirmation (.1).		
12/31/25	Charlotte Underwood	Communications with Discovery Solutions team regarding document request and collection.	0.10	116.00
12/31/25	Kelly Muenzing	Review as filed 2025-12-30 (Dkt 2207) BT's Fifteenth Monthly Fee Statement for the Period November 1, 2025 through November 30, 2025 (.1); communications with K. Kansa regarding same (.1); communications with fee notice parties regarding same (.1); precise tracking and timely updates of deadlines and filings (.1); communications with L. Parks regarding BT's Fifth Interim Fee Application (.1).	0.50	217.50
12/31/25	Kenneth Kansa	Participate in call with C. Topping and Province on effective date preparations (.5); emails to K. Muenzing on fee application (.2); email to Special Committee on delay of Effective Date and plan administrator capacity to take over (.2); review C. Topping email on D&O insurance for 2026 (.1).	1.00	1,325.00
Fees for Services				\$ 275,650.50

	Hours	Rate	Amount
Kathleen L. Matsoukas	11.60	\$970.00	\$11,252.00
Aaron Gavant	2.30	\$950.00	\$2,185.00
Ning He	0.30	\$935.00	\$280.50
Paige Lohse	107.20	\$795.00	\$85,224.00
Leah O'Farrell	3.90	\$710.00	\$2,769.00
Haley Casper	0.40	\$675.00	\$270.00
Lydia Parks	1.30	\$530.00	\$689.00
Kevin Warren	4.60	\$530.00	\$2,438.00
Joseph Kipp	39.80	\$500.00	\$19,900.00
Anita Peterson	13.60	\$445.00	\$6,052.00
Kelly Muenzing	24.80	\$435.00	\$10,788.00
Kathleen A. Murphy	0.20	\$365.00	\$73.00
David Bartholomew	0.90	\$315.00	\$283.50

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FIDUCIARY DUTY INVESTIGATION

	Hours	Rate	Amount
Christopher Long	0.40	\$270.00	\$108.00
Kenneth Kansa	40.50	\$1,325.00	\$53,662.50
Charlotte Underwood	7.30	\$1,160.00	\$8,468.00
Carrie M. Raver	2.40	\$1,045.00	\$2,508.00
Trace (Vincent P.) Schmeltz	68.70	\$1,000.00	\$68,700.00
TOTALS	330.20		\$275,650.50

Other Charges:

11/30/25	168-Pacer Court Filing System Charges 11/01/2025 - 11/30/2025	3.00
12/02/25	Copying Charges	203.85
12/02/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Trip to Houston, TX - depositions. - Round trip and from Houston TX to Chicago - Flight Date - 12/01/2025 - Houston, Texas (IAH) - Transaction Date - 11/29/2025	1,221.00
12/02/25	Color Copies - Resource center	112.50
12/03/25	Court Reporters Clearinghouse Inc - Court Reporters Clearinghouse Inc - Court reporter depositions fees Inv Number: 210010 10/31/2025	879.18
12/04/25	FedEx PS Ship - Fedex - Inv#910155424 - to Anita Wenrick Peterson, Barnes & Thornburg LLP, CHICAGO, IL, US from LAWRENCE MONTES	114.67
12/04/25	FedEx PS Ship - Fedex - Inv#910155424 - to Anita Wenrick Peterson, Barnes & Thornburg LLP, CHICAGO, IL, US from LAWRENCE MONTES	154.31
12/04/25	FedEx PS Ship - Fedex - Inv#910155424 - to Anita Wenrick Peterson, Barnes & Thornburg LLP, CHICAGO, IL, US from LAWRENCE MONTES	124.78
12/04/25	FedEx PS Ship - Courier Service Fedex - Inv#910155424 - to Anita Wenrick Peterson, Barnes & Thornburg LLP, CHICAGO, IL, US from LAWRENCE MONTES	160.31

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12/04/25	Court Reporters Clearinghouse Inc - Court Reporters Clearinghouse Inc - Deposition copy of: Chris Wheeler Inv Number: 210013 10/31/2025	1,034.91
12/08/25	Catherine Lohse - Catherine Lohse - Taxi/Car Service - Travel to Houston for trial/hearing on December 3 - Uber airport to house - 12/04/2025	68.98
12/08/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Houston, TX - trial Uber trip from 3300 Smith St., Houston, TX to 806 Main St. Houston, TX - 12/03/2025	43.15
12/08/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Houston, TX - trial Uber trip f- CANCELLATION FEE. - 12/03/2025	5.23
12/08/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Houston, TX - trial Uber trip from 675 N. Franklin St. Chicago, IL to O'Hare Airport - 12/01/2025	76.11
12/08/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Houston, TX - trial Uber trip from O'Hare airport to 750 N Hudson Avenue, Chicago, IL - 12/04/2025	98.36
12/08/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Houston, TX - trial Uber trip from George Bush Intercontinental Airport (IAH) Houston, TX to 806 Main St. Houston, TX - 12/02/2025	76.74
12/08/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Houston, TX - trial Uber trip from 806 Main St. Houston, TX to George Bush Intercontinental Airport (IAH) Houston, TX - 12/04/2025	71.57
12/08/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Houston, TX - trial Uber trip from 750 N Hudson Avenue, Chicago, IL to 675 N. Franklin St. Chicago, IL - 12/01/2025	21.16
12/08/25	Catherine Lohse - Catherine Lohse - Taxi/Car	57.18

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FIDUCIARY DUTY INVESTIGATION

	Service - Travel to Houston for trial/hearing on December 3 - Uber airport to hotel - 11/30/2025	
12/08/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Houston, TX - trial Uber trip from 806 Main St. Houston, TX to 3300 Smith St., Houston, TX - 12/03/2025	18.87
12/08/25	Catherine Lohse - Catherine Lohse - Taxi/Car Service - Travel to Houston for trial/hearing on December 3 - Uber hotel to airport - 12/04/2025	79.65
12/08/25	Catherine Lohse - Catherine Lohse - Taxi/Car Service - Travel to Houston for trial/hearing on December 3 - Uber from home to O'Hare - 11/30/2025	72.43
12/08/25	Catherine Lohse - Catherine Lohse - Travel to Houston for trial/hearing on December 3 - - Flight Date - 11/30/2025 - Houston, TX - Transaction Date - 11/20/2025	508.95
12/08/25	Catherine Lohse - Catherine Lohse - Travel to Houston for trial/hearing on December 3 - - Flight Date - 12/04/2025 - Chicago IL - Transaction Date - 11/20/2025	258.25
12/08/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Lodging - Trip to Houston, TX - trial JW Marriott Houston Downtown, 806 Main St., Houston, TX - 12/01/2025 - 12/04/2025	1,833.02
12/08/25	Catherine Lohse - Catherine Lohse - Lodging - Travel to Houston for trial/hearing on December 3 - - 11/30/2025 - 12/04/2025	1,730.43
12/08/25	Catherine Lohse - Catherine Lohse - Lodging - Travel to Houston for trial/hearing on December 3 - Uber airport to house - 11/30/2025 - 12/04/2025	2,715.81
12/09/25	E-Filing Court Documents - E-Filing documents with Court 12-09-2025	50.00
12/10/25	Catherine Lohse - Catherine Lohse - Taxi/Car Service - Travel to Houston for November 3 trial - Uber airport to hotel - 11/02/2025	63.24
12/10/25	Catherine Lohse - Catherine Lohse - Taxi/Car Service - Travel to Houston for November 3 trial	67.83

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FIDUCIARY DUTY INVESTIGATION

	- Uber hotel to airport - 11/04/2025	
12/10/25	Catherine Lohse - Catherine Lohse - Travel to Houston for November 3 trial - - Flight Date - 11/04/2025 - Indianapolis, Indiana - Transaction Date - 11/04/2025	286.42
12/10/25	Catherine Lohse - Catherine Lohse - Travel to Houston for November 3 trial - - Flight Date - 11/04/2025 - Chicago IL - Transaction Date - 11/04/2025	93.51
12/10/25	Catherine Lohse - Catherine Lohse - Travel to Houston for November 3 trial - - Flight Date - 11/02/2025 - Chicago IL - Transaction Date - 11/07/2025	486.64
12/10/25	Catherine Lohse - Catherine Lohse - Lodging - Travel to Houston for November 3 trial - Purchase of new mouse - 11/02/2025 - 11/05/2025	1,028.79
12/10/25	Paul T. Olszowka - Paul T. Olszowka - Lodging - Mastercard - HOUSTONIAN HOTEL FD - 12/02/2025 - Hotel expenses for witness Chris Wheeler - 12/02/2025 - 12/04/2025	1,144.31
12/10/25	Catherine Lohse - Catherine Lohse - Computer Supplies - Travel to Houston for November 3 trial - Purchase of new mouse - 11/02/2025	108.25
12/11/25	Veritext LLC - Veritext LLC - Audio - Transcription - Hearing Inv Number: 8837230 12/03/2025	65.70
12/12/25	E-Filing Court Documents - E-Filing documents with Court 12-12-2025	50.00
12/15/25	Kenneth Kansa - Kenneth Kansa - Taxi/Car Service - Attend the confirmation hearing on 12/3 and related preparation sessions uber from airport to hotel - 12/02/2025	95.49
12/15/25	Kenneth Kansa - Kenneth Kansa - Parking - Attend the confirmation hearing on 12/3 and related preparation sessions parking at O'Hare airport - 12/04/2025	129.00
12/15/25	Kenneth Kansa - Kenneth Kansa - Taxi/Car Service - Attend the confirmation hearing on 12/3 and related preparation sessions uber from	163.10

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FIDUCIARY DUTY INVESTIGATION

	hotel to airport - 12/03/2025	
12/15/25	Veritext LLC - Veritext LLC - Transcript of Hearing 12/03/25 Inv Number: 8861024 12/11/2025	334.95
12/15/25	Kenneth Kansa - Kenneth Kansa - Attend the confirmation hearing on 12/3 and related preparation sessions - Flight Date - 12/01/2025 - Houston, TX - Transaction Date - 11/30/2025	1,026.97
12/15/25	Paul T. Olszowka - Paul T. Olszowka - Lodging - Mastercard - JW MARRIOTT HOUSTON DO - 12/04/2025 - Hotel Charges for Witness Cameron Blackmon - 12/02/2025 - 12/04/2025	1,052.98
12/15/25	Kenneth Kansa - Kenneth Kansa - Lodging - Attend the confirmation hearing on 12/3 and related preparation sessions - 12/01/2025 - 12/04/2025	1,441.62
12/15/25	Paul T. Olszowka - Paul T. Olszowka - Lodging - Mastercard - JW MARRIOTT HOUSTON DO - 12/04/2025 - Hotel charges for Witness - 12/01/2025 - 12/04/2025	1,564.47
12/16/25	Trace (Vincent P.) Schmeltz III - Flight - ORD to IAH (12/17/25), IAH to STL (12/17/25), STL to ORD (12/18/25). Total airfare: \$1,622.87, with cost split evenly between two clients.	811.44
12/18/25	Catherine Lohse - Catherine Lohse - Taxi/Car Service - Uber from office/home after working late on closing argument - 12/16/2025	28.48
12/22/25	Copying Charges	208.35
12/22/25	Veritext LLC - Veritext LLC - Audio - Transcription - Hearing Inv Number: 8870182 12/15/2025	262.80
12/23/25	Paul T. Olszowka - Paul T. Olszowka - Lodging - Mastercard - JW MARRIOTT HOUSTON DO - 12/04/2025 - Chase Blackman Trial Hotel Expense - 12/02/2025 - 12/04/2025	1,052.98
12/31/25	Everlaw Inc - Professional Services; Active Review - eDiscovery Hosting Services Subscription Fees 12-31-2025	2,548.00

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FIDUCIARY DUTY INVESTIGATION

12/31/25 Everlaw Inc - Professional Services; Early Case
Assessment - eDiscovery Hosting Services
Subscription Fees 12-31-2025 1,432.00

\$ 27,341.72

BARNES & THORNBURG LLP

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SPECIAL COMMITTEE OF THE BOARD OF
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DAVIDEATON@RHDM.COM

January 16, 2026
Trace (Vincent P.) Schmeltz
00101065-00000001

PAYABLE UPON RECEIPT

Fees for Services	\$	275,650.50
Other Charges	\$	27,341.72
Total This Invoice	\$	302,992.22

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