

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

In re: RHODIUM ENCORE LLC, <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 24-90448 (ARP) Jointly Administered
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**COVER SHEET
FOR THE FIFTH AND FINAL FEE APPLICATION OF
BARNES & THORNBURG LLP AS COUNSEL TO THE SPECIAL COMMITTEE OF
THE RHODIUM ENTERPRISES, INC. BOARD OF DIRECTORS FOR THE FEE
PERIOD FROM SEPTEMBER 1, 2025 THROUGH JANUARY 14, 2026 AND THE
FINAL PERIOD FROM AUGUST 24, 2024 THROUGH JANUARY 14, 2026**

Name of Applicant:	Barnes & Thornburg LLP
Applicant’s Role in Case:	Counsel to the Special Committee of the Rhodium Enterprises, Inc. Board of Directors
Date Order of Employment Signed:	October 14, 2024 [Docket No. 265] (approving retention as of August 24, 2024)
Interim Application () No. Final Application (X)	Fifth and Final Fee Application

¹ The Special Committee 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 Special Committee in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



	Beginning Date	End Date
Time period covered by this Final Application:	8/24/24	01/14/26
Time period covered by this Fifth Fee Period:	09/01/25	01/14/26
Time periods covered by prior Applications:	First Interim: 08/24/24 Second Interim: 12/01/24 Third Interim: 03/01/25 Fourth Interim: 06/01/25	11/30/24 2/28/25 05/31/25 08/31/25
Were the services provided necessary to the administration of or beneficial at the time rendered toward completion of the case? Yes		
Were the services provided in a reasonable amount of time commensurate with the complexity, importance, and nature of the issues addressed? Yes		
Is the requested compensation reasonable based on customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? Yes		
Do expense reimbursements represent actual and necessary expenses incurred? Yes		
Compensation Breakdown for Time Period Covered by this Application		
Total professional fees requested in this Application:		\$7,971,593.65
Total professional hours covered by this Application:		9,837.4
Average hourly rate for professionals:		\$810.33
Total paraprofessional fees requested in this application:		\$420,621.30

Total paraprofessional hours covered by this Application:	1,079.2
Average hourly rate for paraprofessionals:	\$389.74
Total fees requested in this Application:	\$8,392,214.95
Total expense reimbursements requested by this Application:	\$256,645.17
Total fees and expenses requested in this Application:	\$8,648,860.12
Total fees and expenses awarded in all prior Applications:	\$6,051,187.24
Plan Status: On December 19, 2025, the Bankruptcy Court entered its order approving the Disclosure Statement for, and confirming, the Second Amended Joint Chapter 11 Plan of Liquidation for Rhodium Encore LLC and its Affiliated Debtors [Docket No. 2170] (the “Plan”). The Effective Date of the Plan occurred on January 14, 2026 [Docket No. 2247].	
Primary Benefits: Advised and assisted the Special Committee of the Board of Directors of Rhodium Enterprises, Inc. in carrying out its mandate from the Board of Directors, which included conferring with all major stakeholders on various settlements intended to form the basis of the Debtors’ liquidation pursuant to a confirmed chapter 11 plan, exercising authority on behalf of Rhodium Enterprises to investigate, resolve, and/or settle any claims belonging to Rhodium Enterprises that may constitute Conflict Matters ² , and negotiating and documenting certain settlements as part of the Plan and its related documents, together with participating in court hearings as necessary.	

² A “Conflict Matter” is a matter in which a conflict of interest exists or is reasonably likely to exist between Rhodium Enterprises, on the one hand, and any of its direct or indirect equity holders, affiliates, subsidiaries, directors, officers, or other stakeholders, or any affiliate or other related party of the foregoing.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
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In re:

RHODIUM ENCORE LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-90448 (ARP)

Jointly Administered

**FIFTH AND FINAL FEE APPLICATION
OF BARNES & THORNBURG LLP AS COUNSEL TO THE SPECIAL COMMITTEE
OF THE RHODIUM ENTERPRISES, INC. BOARD OF DIRECTORS FOR THE FEE
PERIOD FROM SEPTEMBER 1, 2025 THROUGH JANUARY 14, 2026 AND THE
FINAL PERIOD FROM AUGUST 24, 2024 THROUGH JANUARY 14, 2026**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this application was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this application was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the

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Southern District of Texas (the “Local Rules”), and this Court’s *Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals*, entered on October 14, 2024 [Docket No. 264] (the “Compensation Procedures Order”), Barnes & Thornburg LLP (“B&T”), counsel to the Special Committee of the Rhodium Enterprises, Inc. Board of Directors (the “Special Committee”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby files this fifth interim and final fee application (this “Application”) for entry of an order, substantially in the form attached to this Application (the “Proposed Order”), (i) granting allowance and approval of (a) compensation for B&T’s services to the Special Committee during the period from September 1, 2025 to and including January 14, 2026 (the “Fifth Interim Fee Period”) in the amount of \$2,422,896.50 and (b) reimbursement of expenses that B&T incurred during the Fifth Interim Fee Period in the amount of \$174,776.38, (ii) granting allowance and approval of (a) compensation for B&T’s services to the Special Committee during the period commencing August 24, 2024 through January 14, 2026 (the “Final Fee Period”) in the amount of \$8,392,214.95 and (b) reimbursement of actual and necessary expenses incurred during the Final Fee Period in the amount of \$256,645.17; (iii) authorizing and directing payment of all the foregoing fees and expenses, less amounts previously paid to B&T by the debtors and debtors in possession in the above-captioned Chapter 11 Cases (the “Debtors”) pursuant to the Compensation Procedures Order, and (iv) granting such other and further relief as this Court may deem just and proper. In further support of the Application, B&T respectfully represents as follows:

STATUS OF CASE AND JURISDICTION

1. On August 24, 2024 and August 29, 2024 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States

Bankruptcy Court for the Southern District of Texas (the “Court”). The Debtors operated their business and managed their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code until the Effective Date. No trustee or examiner was appointed in these cases. On November 22, 2024, the Office of the United States Trustee (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “UCC”) in the Chapter 11 Cases, which was reconstituted on June 9, 2025.

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory and other bases for the relief requested herein are Bankruptcy Code sections 105(a), 330 and 331, Bankruptcy Rule 2016, Local Rule 2016-1, and the Compensation Procedures Order.

5. The Special Committee retained B&T as counsel effective as of the Petition Date pursuant to the *Order Authorizing the Retention and Employment of Barnes & Thornburg LLP as Special Counsel Effective as of the Petition Date* [Docket No. 266] (the “Retention Order”). The Retention Order authorizes the Debtors to compensate and reimburse B&T subject to allowance of such compensation and reimbursement by the Court.

6. On November 30, 2025, Rhodium Encore LLC and its affiliated Debtors filed the Second Amended Joint Chapter 11 Plan of Liquidation with the Court [Docket No. 2062] (the “Plan”).

7. On December 19, 2025, the Court approved the Disclosure Statement for, and confirmed, the Plan [Docket No. 2170].

8. The Effective Date of the Plan occurred on January 14, 2026 [Docket No. 2247].

B&T'S PRIOR FEE APPLICATIONS

9. Prior to this Application, B&T filed four Interim Fee Applications with the Court, each of which has been approved. The First through Fourth Interim Fee Applications collectively covered the period from the Petition Date through August 31, 2025. Each of the First, Second, Third, and Fourth Interim Fee Applications is incorporated herein by reference.

10. Following this Court's approval of B&T's First through Fourth Interim Fee Applications, and pursuant to the procedures set forth in the Compensation Procedures Order, B&T filed with the Court and served upon the appropriate notice parties five monthly fee statements (the "Monthly Fee Statements") collectively covering the period from September 1, 2025 through January 14, 2026. Each of B&T's Monthly Fee Statements contain detailed time and expense records which relate to the periods covered by each Monthly Fee Statement, and each is incorporated herein by reference. Additionally, the records of time expended providing professional and paraprofessional services to the Debtors during the Fifth Interim Fee Period and a detailed statement of B&T's out-of-pocket expenses incurred during such period are attached hereto as **Exhibit A**. Detailed time entries for the rest of the Final Fee Period are attached to the First through Fourth Interim Fee Applications and Monthly Fee Statements filed on the docket of these cases, which are also incorporated by reference, as detailed in the chart in the paragraph immediately following.

11. A summary of the prior Interim Fee Applications and the subsequent Monthly Fee Statements previously filed by B&T is set forth in the chart below:

		Requested		Paid		Outstanding	
Date Filed; Docket No.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses
1st Interim Fee Application; 01/14/2025; [Dkt. No. 632]	08/24/24 – 11/30/24	\$1,121,297.50	\$2,916.80	\$1,121,297.50	\$2,916.80	\$0.00	\$0.00
2nd Interim Fee Application; 04/15/2025; [Dkt. No. 946]	12/01/24 – 02/28/25	\$1,781,394.95	\$17,102.31	\$1,781,394.95	\$17,102.31	\$0.00	\$0.00
3rd Interim Fee Application; 07/15/2025 [Dkt. No. 1445]	03/01/25 – 05/31/25	\$1,610,893.50	\$13,115.69	\$1,610,893.50	\$13,115.69	\$0.00	\$0.00
4th Interim Fee Application; 11/04/2025 [Dkt. No. 1958]	06/01/25 – 08/31/25	\$1,455,732.50	\$48,733.99	\$1,455,732.50	\$48,733.99	\$0.00	\$0.00
13th Monthly Fee Statement; 10/30/2025; [Dkt. No. 1894]	09/01/25 – 09/30/25	\$368,492.00 (80% of \$460,615.00)	\$13,815.68	\$368,492.00	\$13,815.68	\$92,123.00	\$0.00
14th Monthly Fee Statement; 11/20/2025; [Dkt. No. 2005]	10/01/25 – 10/31/25	\$992,355.20 (80% of \$1,240,444.00)	\$79,453.46	\$992,355.20	\$79,453.46	\$248,088.80	\$0.00
15th Monthly Fee Statement; 12/30/2025; [Dkt. No. 2207]	11/01/25 – 11/30/25	\$330,172.00 (80% of \$412,715.00)	\$53,667.52	\$330,172.00	\$53,667.52	\$82,543.00	\$0.00
16th Monthly Fee Statement; 01/28/2026 [Dkt. No. 2280]	12/01/25 – 12/31/25	\$220,520.40 (80% of \$275,650.50)	\$27,341.72	\$0.00	\$0.00	\$275,650.50	\$27,341.72
17th Monthly Fee Statement; 02/12/2026 [Dkt. No. 2297]	01/01/26 – 01/14/26	\$26,777.60 (80% of \$33,472.00)	\$498.00	\$0.00	\$0.00	\$33,472.00	\$498.00
Total		\$7,907,635.65	\$256,645.17	\$7,660,337.65	\$228,805.45	\$731,877.30	\$27,839.72

RELIEF REQUESTED

12. By this Application, B&T respectfully requests entry of an order (i) granting allowance and approval of (a) compensation for B&T's services to the Special Committee for the

Fifth Interim Fee Period in the amount of \$2,422,896.50 and (b) reimbursement of expenses that B&T incurred during the Fifth Interim Fee Period in the amount of \$174,776.38, (ii) granting allowance and approval of compensation for B&T's services to the Special Committee during the Final Fee Period commencing August 24, 2024 through January 14, 2026 in the amount of \$8,392,214.95, together with the reimbursement of actual and necessary expenses incurred during the Final Fee Period in the amount of \$256,645.17; (iii) authorizing and directing payment of all the foregoing fees and expenses, less amounts previously paid to B&T by the Debtors pursuant to the Compensation Procedures Order, and (iv) granting such other and further relief this Court may deem just and proper.

**FEES EARNED DURING THE FIFTH INTERIM FEE PERIOD
AND THE FINAL FEE PERIOD**

I. Customary Billing Disclosures

13. B&T's hourly rates are set at a level designed to compensate B&T fairly for the work of its attorneys and paraprofessionals and to cover fixed and routine expenses. The hourly rates charged by B&T in the Chapter 11 Cases during the Fifth Interim Fee Period and the Final Fee Period, respectively, were billed in accordance with B&T's rates and procedures in effect during the Fifth Interim Fee Period and the Final Fee Period and in accordance with the Retention Order. As described in the Special Committee's *Application to Employ Barnes & Thornburg LLP as Counsel to the Special Committee of the Rhodium Enterprises, Inc. Board of Directors* [Docket No. 175] (the "Retention Application"), the rates B&T charges for the services of its attorneys and paraprofessionals in the Chapter 11 Cases are consistent with the rates B&T charges other comparable chapter 11 clients, regardless of the location of the case. Moreover, B&T's rate structure is appropriate and not different from the rates that B&T charges for non-bankruptcy

representations or the rates that other comparable counsel would charge to perform substantially similar services.

14. B&T has received no payment or promises of payment from any source other than the Debtors for its services rendered to the Special Committee in the Chapter 11 Cases. There is no agreement or understanding between B&T and any other entity or person, other than members of the firm, for the sharing of compensation to be received for services rendered in or in connection with the Chapter 11 Cases. All professional and paraprofessional services for which B&T is requesting compensation were rendered solely on behalf of the Special Committee.

15. In compliance with paragraph C.5 of the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses by Attorneys in Larger Chapter 11 Cases, effective November 13, 2013:

- a. B&T did not agree to any variations from, or alternatives to, its standard or customary billing rates for services pertaining to this engagement that were provided during the Fifth Interim Fee Period and/or the Final Fee Period.
- b. None of the professionals included in the Application varied their hourly rate based on the geographic location of these Chapter 11 Cases.
- c. The Application does not include any fees dedicated to reviewing or revising time records or preparing, reviewing, or revising invoices that would not normally be compensable outside of bankruptcy. The Application does include certain time relating to preparation of B&T's prior fee applications in these Chapter 11 Cases. Those fees are primarily incurred by B&T's paralegals preparing the fee applications, who bill at hourly rates lower than B&T's attorneys. Such fees are a small percentage of B&T's overall fees during the Fifth Interim Fee Period and the Final Fee Period.
- d. The time entries covered by the Application for the Fifth Interim Fee Period include approximately 0.9 hours with a value of \$1,014.00 spent by B&T (Mr. Kansa) to ensure that the time entries for the Fifth Interim Fee Period did not disclose privileged or confidential information. The time entries covered by the Application for the Final Fee Period include approximately 4.5 hours with a value of \$5,352.00 spent by B&T to ensure that the time entries for the Final Fee Period did not disclose privileged or confidential information. These reviews and any revisions associated therewith are a necessary component of B&T's preparation of each fee application.

- e. The Application includes an annual increase in hourly rates for certain attorneys relative to the Fourth Interim Fee Application, effective as of the Sixteenth Monthly Fee Statement. Such increase was a generally applicable increase for such attorneys across all clients, consistent with B&T's standard billing practices and as disclosed in B&T's retention application. B&T notes that the hourly rate for Mr. Schmeltz, as the lead attorney respecting the engagement on behalf of the Special Committee, was frozen at \$1,000 per hour for the duration of the Chapter 11 Cases by agreement with the Special Committee.

II. Supporting Documentation

16. For the convenience of the Court and parties in interest, the following exhibits are attached to this Application:

- a. **Exhibit A** includes the records of time expended providing professional and paraprofessional services to the Special Committee during the Fifth Interim Fee Period as well as a detailed statement of B&T's out-of-pocket expenses incurred during the Fifth Interim Fee Period.
- b. **Exhibit B** is B&T's disclosures of customary and comparable compensation, including blended hourly rates, for the Fifth Interim Fee Period and the Final Fee Period.
- c. **Exhibit C** is a schedule identifying all B&T attorneys and paraprofessionals who provided services to the Special Committee during the Fifth Interim Fee Period and the Final Fee Period, including, with respect to each attorney and paraprofessional, as applicable, his or her position and area of expertise, date of admission, average hourly rate, hours billed, and total fees charged.

SUMMARY OF SERVICES

17. Attached hereto as **Exhibit A** is the time and expense detail showing B&T's time expended, and fees and expenses incurred during the Fifth Interim Fee Period. Detailed time entries for the Final Fee Period were submitted with the First through Fourth Interim Fee

Applications and are incorporated herein by reference. B&T's attorneys and paraprofessionals expended a total of 3,426.8 hours in connection with the Chapter 11 Cases during the Fifth Interim Fee Period and 10,916.6 hours during the Final Fee Period. All services for which B&T is requesting compensation were performed for or on behalf of the Special Committee.

18. B&T rendered extensive services to the Special Committee during the Fifth Interim Fee Period. In particular, and without limiting the descriptions provided in the fee detail attached hereto as **Exhibit A**, B&T's services included but were not limited to:

- Conferring with representatives of all major stakeholder constituencies, including the Debtors, the Ad Hoc Group of SAFE Parties (the "SAFE AHG"), the Transcend Group, the Class A Shareholders in Rhodium Enterprises, Inc., the Debtors' founders (the "Founders"), Imperium Investments Holdings, LLC ("Imperium"), and other constituencies on various settlements of Conflict Matters intended to form the basis for the Debtors' liquidation pursuant to a confirmed chapter 11 plan;
- Researching, analyzing, and pursuing potential claims relating to Conflict Matters against third parties on behalf of the Debtors;
- Reviewing and analyzing the Bankruptcy Court's ruling on August 30, 2025 overruling the Debtors' objection to the SAFE AHG Claims and negotiating and developing settlement structures relating to the SAFE AHG Claims to take into account such ruling, including extensive negotiations with counsel to the SAFE AHG respecting the terms and structuring of such settlements;
- Negotiating and documenting the settlement of numerous issues relating to the SAFE AHG Claims, including the incorporation of those settlements into the Plan Support Agreement filed with the Bankruptcy Court on October 7, 2025 [Docket No. 1747], and the First Amended Joint Plan of Reorganization and accompanying Disclosure Statement filed with the Bankruptcy Court on October 19, 2025 [Docket Nos. 1821 and 1822], including conferrals with all major stakeholders regarding such settlements;
- Negotiating, preparing, and finalizing settlements with the Debtors' directors' and officers' liability insurers that were embodied in the Plan, and which brought in to the Debtors' estates \$8.5 million in value from the D&O Insurers plus the reimbursement of roughly \$1 million in fees and expenses incurred by the Founders in connection with the investigation and defense of the Debtors' claims against them, and the reimbursement to the Debtors' estates of \$250,000 in derivative investigation costs (the maximum applicable sublimit) relating to the Special Committee's investigation, and incorporating those settlements into the Plan and Disclosure Statement;

- Participating, on behalf of the Special Committee, in the hearing to consider conditional approval of the Disclosure Statement, which was granted by the Bankruptcy Court on October 21, 2025 [Docket No. 1834], and working with counsel to the Debtors and counsel to the SAFE AHG in addressing objections raised to such conditional approval by the Transcend Group [Docket No. 1787];
- Participating in the negotiation of the settlement stipulation by and among the Debtors (acting through the Special Committee), the SAFE AHG, the Transcend Group, and the Other Encore Parties filed with the Bankruptcy Court on November 20, 2025 [Docket No. 2006], which resolved the Transcend Group's and the Other Encore Parties' objections to confirmation of the Plan;
- Addressing, on behalf of the Special Committee, extensive discovery requests made by the Transcend Group relating to its objections to the Disclosure Statement and intended objections to the Plan, and objecting to the Transcend Group's Emergency Motion to Compel Depositions of ten individuals, including counsel for the co-proponents of the Plan, regarding various aspects of the Plan and Disclosure Statement [Docket No. 1795];
- Addressing, on behalf of the Special Committee, extensive document requests made by the SAFE AHG, including document review, preparing, and revising a highly detailed privilege log at the SAFE AHG's demand;
- Addressing numerous ancillary issues relating to the finalization of the SAFE AHG settlement, the D&O insurers' settlement, and the settlement of the Transcend Parties' claims and the embodiment of those settlements into the Plan filed with the Bankruptcy Court on November 30, 2025 [Docket No. 2062];
- Negotiating where necessary on behalf of the Special Committee the documents contained in the Plan Supplement relating to the Debtors' chapter 11 plan, which was filed with the Bankruptcy Court on November 19, 2025 [Docket No. 2001] and amended on December 2, 2025 [Docket No. 2103];
- Addressing, on behalf of the Special Committee and together with counsel to the Debtors, the SAFE AHG, the Transcend Group, and others, formal and informal objections to the settlements contained in the Plan and other Plan-related issues in advance of the December 3, 2025 hearing to consider confirmation of the Plan;
- Preparing, together with counsel to the Debtors and the SAFE AHG, the Plan Proponents' Memorandum of Law in support of confirmation of the Plan, which was filed with the Bankruptcy Court on December 1, 2025 [Docket No. 2088], as well as the Declaration of David Eaton, a member of the Special Committee, in support of confirmation of the Plan [Docket No. 2074];
- Preparing for and participating in, on behalf of the Special Committee, the December 3, 2025 hearing to consider confirmation of the Plan and final approval of the Disclosure

Statement, which resulted in approval of the Disclosure Statement and confirmation of the Plan [Docket No. 2170];

- Preparing for and participating in the hearing regarding the Transcend Group’s Motion to Remand an action originally filed in Texas state court and removed to federal court, including participating in discovery regarding the same;
- Attending meetings of Rhodium Enterprises’ Board of Directors as requested by the members of the Special Committee;
- Objecting to Lehotsky Keller Cohn LLP’s (“LKC”) Second and Final Application for Payment of Compensation and Reimbursement of Expenses [Docket Nos. 1560-1561] (the “Second and Final Fee Application”) including:
 - Conferring with LKC and its counsel, Porter Hedges, on many issues, including but not limited to relating to settlement negotiations, scheduling, discovery, redactions, and various miscellaneous disputes about underlying substance;
 - Researching, analyzing, and drafting an objection to LKC’s Second and Final Fee Application (the “Objection”);
 - Conferring with the Special Committee and proponents of the Plan, including the Debtors, the Debtors’ counsel, the SAFE AHG, and the SAFE AHG’s counsel, among others, regarding strategies for settlement negotiations and litigation of the objection to LKC’s Second and Final Fee Application;
 - Drafting a motion to Quash LKC’s discovery requests before LKC filed its Second and Final Fee Application, drafting briefs on numerous additional discovery-related motions pertaining to the dispute after LKC filed its Second and Final Fee Application, and arguing the motions before the Court;
 - Drafting responses and objections to LKC’s broad discovery requests;
 - In order to accurately and comprehensively respond to LKC’s discovery requests, interviewing approximately five witnesses to ensure discovery was comprehensive and accurate, collecting documents from eight record custodians amounting to approximately 190,000 documents, running search terms to narrow the set down to a review of well over 6,000 documents, reviewing said documents within one week, confirming protections on documents for privilege and confidentiality, producing documents, and further conferrals on document productions;
 - Drafting and issuing discovery requests on behalf of the Special Committee to LKC, and reviewing LKC’s responses;
 - Negotiating with counsel for Whinstone US, Inc. / Riot Platforms, Inc. regarding a final agreement and approach on tax allocation, and related assistance in drafting

and revising a Motion to Enforce Purchase and Sale Agreement, which was filed on October 28, 2025 [Docket No. 1881];

- Preparing for and defending approximately seven depositions (with one cancelled at the last minute) and deposing one witness over one week at four different locations across the United States;
 - Preparing specialist witnesses to opine on tax allocation and other damages-related issues, reviewing and revising declarations and expert reports, defending depositions, and responding to LKC's Motion to Strike Expert and related motions.
 - Drafting and responding to motions seeking to narrow the issues and limit the evidence presented in the hearing on the Objection to LKC's Second and Final Fee Application; and
 - Preparing for and participating in hearings on November 3, 2025, December 3, 2025, December 11, 2025, and December 17, 2025 regarding the Objection to LKC's Second and Final Fee Application.
- Conferring extensively with the Special Committee regarding the implications of the SAFE AHG claim ruling and the objection to LKC's Second and Final Fee Application;
 - Addressing requests from the Plan Administrator-designate on behalf of the Special Committee; and
 - Advising the Special Committee following confirmation of the Plan with respect to the implementation of the Plan and the intended effectiveness of the Plan.

ACTUAL AND NECESSARY EXPENSES

19. Included as part of **Exhibit A** is a detailed statement of B&T's out-of-pocket expenses incurred during the Fifth Interim Fee Period, totaling \$174,776.38. These expenses include travel and preparation associated with the hearings on confirmation of the Plan and the Debtors' Objection to LKC's Second and Final Fee Application, depositions and associated fees, online research services, filing fees, and eDiscovery hosting services.

20. Included in the First, Second, Third, and Fourth Interim Fee Applications and this Application are detailed statements of B&T's actual and necessary expenses incurred during the Final Fee Period, totaling \$256,645.17. These expenses include court fees, depositions and

interviews, online research services, eDiscovery hosting services, and travel expenses relating to B&T's services to the Special Committee in these Chapter 11 Cases, including attendance at Court hearings, depositions, and similar matters.

**B&T'S REQUESTED COMPENSATION AND
EXPENSE REIMBURSEMENT SHOULD BE ALLOWED**

21. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered and reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330 also establishes the following non-exclusive criteria to determine the amount of reasonable compensation to be awarded:

In determining the amount of reasonable compensation to be awarded, the court should consider the nature, extent, and the value of such services, taking into account all relevant factors, including—

- (a) the time spent on such services;
- (b) the rates charged for such services;
- (c) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered towards the completion of, a case under this title;
- (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and expertise in the bankruptcy field; and
- (f) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

22. B&T respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, necessary for and beneficial to the Special Committee and

were rendered to assist the Special Committee in discharging its statutory duties during the pendency of the Chapter 11 Cases. B&T further believes that its services to the Special Committee during the Fifth Interim Fee Period and the Final Fee Period were performed efficiently and in an expert manner and ultimately benefitted the Special Committee and these Chapter 11 Cases. B&T submits that the compensation and reimbursement of expenses requested herein are reasonable considering the nature, extent, and value of B&T's services to the Special Committee. Accordingly, the Application should be approved.

RESERVATION OF RIGHTS

23. B&T reserves the right to modify, amend, or supplement this Application at any time before the hearing on this Application.

NOTICE

24. This Application shall be served on all applicable parties pursuant to the Procedures for Complex Cases in the Southern District of Texas and the Compensation Procedures Order.

PRAYER FOR RELIEF

25. B&T requests that the Court enter the Proposed Order (i) granting allowance and approval of (a) compensation for B&T's services to the Special Committee for the Fifth Interim Fee Period in the amount of \$2,422,896.50 and (b) reimbursement of expenses that B&T incurred during the Fifth Interim Fee Period in the amount of \$174,776.38, (ii) granting allowance and approval of compensation for B&T's services to the Special Committee for the Final Fee Period commencing August 24, 2024 through January 14, 2026 in the amount of \$8,392,214.95, together with the reimbursement of actual and necessary expenses incurred during the Final Fee Period in the amount of \$256,645.17; (iii) authorizing and directing payment of all the foregoing fees and expenses, less amounts the Debtors previously paid to B&T pursuant to the Compensation

Procedures Order on account of B&T's services to the Special Committee, and (iv) granting such other and further relief this Court may deem just and proper.

Dated: February 27, 2026
Houston, Texas

BARNES & THORNBURG LLP

/s/ Vincent P. (Trace) Schmeltz III

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 the Board of
Directors of Rhodium Enterprises, Inc.*

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

In re:

RHODIUM ENCORE LLC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-90448 (ARP)

Jointly Administered

**CERTIFICATION OF TRACE SCHMELTZ IN SUPPORT OF
BARNES & THORNBURG LLP’S FIFTH AND FINAL FEE APPLICATION
FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE FEE PERIOD FROM SEPTEMBER 1, 2025 THROUGH
NOVEMBER 30, 2025 AND THE
FINAL PERIOD FROM AUGUST 24, 2024 THROUGH JANUARY 14, 2026**

I, Trace Schmeltz, hereby certify that:

1. I am a Partner of the firm Barnes & Thornburg LLP (“B&T”). B&T maintains offices at, among other places, 2121 N. Pearl Street, Suite 700, Dallas, Texas 75201.²

2. This certification (the “Certification”) is made in connection with B&T’s Fifth Interim and Final Fee Application, dated February 27, 2026 (the “Application”), for compensation and reimbursement of expenses for (i) the Interim Period commencing September 1, 2025 through January 14, 2026 and (ii) the Final Period commencing August 24, 2024 through January 14, 2026 (the “Final Fee Period”) in connection with services provided by B&T to the Special Committee.

¹ The Special Committee 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 Special Committee in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

² Capitalized terms not defined in this Certification shall have the meanings ascribed to them in the Application.

I have reviewed the Application and hereby certify that the Application complies with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Bankruptcy Local Rules, and Fee Guidelines.

3. B&T discussed its rates and fees with the Special Committee and the Debtors at the outset of these cases and continued to discuss its rates and fees with the Special Committee and the Debtors throughout the cases. As described in more detail in the Application and the supporting exhibits, the B&T attorneys and paraprofessionals assigned to this matter were necessary to assist with investigating a wide range of claims made against various current and former members of the Debtors' Board of Directors, in advising the Special Committee with respect to the conclusions arising from that investigation, negotiating and documenting settlements arising from the results of the investigation that would facilitate an orderly distribution of the value of the Debtors' estates to creditors and interest holders through a confirmed chapter 11 plan of liquidation, advising the Special Committee with respect to various Conflict Matters, taking actions as appropriate to address such matters as directed by the Special Committee, and addressing various ancillary tasks relating to all of the foregoing.

4. The attorneys and paraprofessionals assigned to this matter rendered extensive services to the Special Committee during the Fifth Interim and Final Fee Period. Those services are detailed in the time and expense detail previously submitted by B&T as part of its Monthly Fee Statements and Interim Fee Applications, which detail is incorporated into the Application by reference. Without limiting the foregoing, B&T's services during the Final Fee Period included, but were not limited to:

- Conferring with representatives of all major stakeholder constituencies, including the Debtors, the Ad Hoc Group of SAFE Parties (the "SAFE AHG"), the Transcend Group, the Class A Shareholders in Rhodium Enterprises, Inc., the Debtors' founders (the "Founders"), Imperium Investments Holdings, LLC ("Imperium"), and other

constituencies on various settlements of Conflict Matters intended to form the basis for the Debtors' liquidation pursuant to a confirmed chapter 11 plan;

- Researching, analyzing, and pursuing potential claims relating to Conflict Matters against third parties on behalf of the Debtors;
- Reviewing and analyzing the Bankruptcy Court's ruling on August 30, 2025 overruling the Debtors' objection to the SAFE AHG Claims and negotiating and developing settlement structures relating to the SAFE AHG Claims to take into account such ruling, including extensive negotiations with counsel to the SAFE AHG respecting the terms and structuring of such settlements;
- Negotiating and documenting the settlement of numerous issues relating to the SAFE AHG Claims, including the incorporation of those settlements into the Plan Support Agreement filed with the Bankruptcy Court on October 7, 2025 [Docket No. 1747], and the First Amended Joint Plan of Reorganization and accompanying Disclosure Statement filed with the Bankruptcy Court on October 19, 2025 [Docket Nos. 1821 and 1822], including conferrals with all major stakeholders regarding such settlements;
- Negotiating, preparing, and finalizing settlements with the Debtors' directors' and officers' liability insurers that were embodied in the Plan, and which brought in to the Debtors' estates \$8.5 million in value from the D&O Insurers plus the reimbursement of roughly \$1 million in fees and expenses incurred by the Founders in connection with the investigation and defense of the Debtors' claims against them, and the reimbursement to the Debtors' estates of \$250,000 in derivative investigation costs (the maximum applicable sublimit) relating to the Special Committee's investigation, and incorporating those settlements into the Plan and Disclosure Statement;
- Participating, on behalf of the Special Committee, in the hearing to consider conditional approval of the Disclosure Statement, which was granted by the Bankruptcy Court on October 21, 2025 [Docket No. 1834], and working with counsel to the Debtors and counsel to the SAFE AHG in addressing objections raised to such conditional approval by the Transcend Group [Docket No. 1787];
- Participating in the negotiation of the settlement stipulation by and among the Debtors (acting through the Special Committee), the SAFE AHG, the Transcend Group, and the Other Encore Parties filed with the Bankruptcy Court on November 20, 2025 [Docket No. 2006], which resolved the Transcend Group's and the Other Encore Parties' objections to confirmation of the Plan;
- Addressing, on behalf of the Special Committee, extensive discovery requests made by the Transcend Group relating to its objections to the Disclosure Statement and intended objections to the Plan, and objecting to the Transcend Group's Emergency Motion to Compel Depositions of ten individuals, including counsel for the co-proponents of the Plan, regarding various aspects of the Plan and Disclosure Statement [Docket No. 1795];

- Addressing, on behalf of the Special Committee, extensive document requests made by the SAFE AHG, including document review, preparing, and revising a highly detailed privilege log at the SAFE AHG's demand;
- Addressing numerous ancillary issues relating to the finalization of the SAFE AHG settlement, the D&O insurers' settlement, and the settlement of the Transcend Parties' claims and the embodiment of those settlements into the Plan filed with the Bankruptcy Court on November 30, 2025 [Docket No. 2062];
- Negotiating where necessary on behalf of the Special Committee the documents contained in the Plan Supplement relating to the Debtors' chapter 11 plan, which was filed with the Bankruptcy Court on November 19, 2025 [Docket No. 2001] and amended on December 2, 2025 [Docket No. 2103];
- Addressing, on behalf of the Special Committee and together with counsel to the Debtors, the SAFE AHG, the Transcend Group, and others, formal and informal objections to the settlements contained in the Plan and other Plan-related issues in advance of the December 3, 2025 hearing to consider confirmation of the Plan;
- Preparing, together with counsel to the Debtors and the SAFE AHG, the Plan Proponents' Memorandum of Law in support of confirmation of the Plan, which was filed with the Bankruptcy Court on December 1, 2025 [Docket No. 2088], as well as the Declaration of David Eaton, a member of the Special Committee, in support of confirmation of the Plan [Docket No. 2074];
- Preparing for and participating in, on behalf of the Special Committee, the December 3, 2025 hearing to consider confirmation of the Plan and final approval of the Disclosure Statement, which resulted in approval of the Disclosure Statement and confirmation of the Plan [Docket No. 2170];
- Preparing for and participating in the hearing regarding the Transcend Group's Motion to Remand an action originally filed in Texas state court and removed to federal court, including participating in discovery regarding the same;
- Attending meetings of Rhodium Enterprises' Board of Directors as requested by the members of the Special Committee;
- Objecting to Lehotsky Keller Cohn LLP's ("LKC") Second and Final Application for Payment of Compensation and Reimbursement of Expenses [Docket Nos. 1560-1561] (the "Second and Final Fee Application") including:
 - Conferring with LKC and its counsel, Porter Hedges, on many issues, including but not limited to relating to settlement negotiations, scheduling, discovery, redactions, and various miscellaneous disputes about underlying substance;

- Researching, analyzing, and drafting an objection to LKC’s Second and Final Fee Application (the “Objection”);
- Conferring with the Special Committee and proponents of the Plan, including the Debtors, the Debtors’ counsel, the SAFE AHG, and the SAFE AHG’s counsel, among others, regarding strategies for settlement negotiations and litigation of the objection to LKC’s Second and Final Fee Application;
- Drafting a motion to Quash LKC’s discovery requests before LKC filed its Second and Final Fee Application, drafting briefs on numerous additional discovery-related motions pertaining to the dispute after LKC filed its Second and Final Fee Application, and arguing the motions before the Court;
- Drafting responses and objections to LKC’s broad discovery requests;
- In order to accurately and comprehensively respond to LKC’s discovery requests, interviewing approximately five witnesses to ensure discovery was comprehensive and accurate, collecting documents from eight record custodians amounting to approximately 190,000 documents, running search terms to narrow the set down to a review of well over 6,000 documents, reviewing said documents within one week, confirming protections on documents for privilege and confidentiality, producing documents, and further conferrals on document productions;
- Drafting and issuing discovery requests on behalf of the Special Committee to LKC, and reviewing LKC’s responses;
- Negotiating with counsel for Whinstone US, Inc. / Riot Platforms, Inc. regarding a final agreement and approach on tax allocation, and related assistance in drafting and revising a Motion to Enforce Purchase and Sale Agreement, which was filed on October 28, 2025 [Docket No. 1881];
- Preparing for and defending approximately seven depositions (with one cancelled at the last minute) and deposing one witness over one week at four different locations across the United States;
- Preparing specialist witnesses to opine on tax allocation and other damages-related issues, reviewing and revising declarations and expert reports, defending depositions, and responding to LKC’s Motion to Strike Expert and related motions.
- Drafting and responding to motions seeking to narrow the issues and limit the evidence presented in the hearing on the Objection to LKC’s Second and Final Fee Application; and
- Preparing for and participating in hearings on November 3, 2025, December 3, 2025, December 11, 2025, and December 17, 2025 regarding the Objection to LKC’s Second and Final Fee Application.

- Conferring extensively with the Special Committee regarding the implications of the SAFE AHG claim ruling and the objection to LKC's Second and Final Fee Application;
- Addressing requests from the Plan Administrator-designate on behalf of the Special Committee; and
- Advising the Special Committee following confirmation of the Plan with respect to the implementation of the Plan and the intended effectiveness of the Plan.

5. Neither a budget nor a staffing plan were prepared or discussed with the Debtors in these chapter 11 cases.

6. In accordance with the Fee Guidelines, B&T responds to the questions identified therein as follows:

Did you agree to any variations from, or alternatives to, your standard or customary billing rates fees, or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Response: Yes. B&T and the Special Committee agreed to fee reductions during the periods covered by the Fourth, Fifth, Sixth and Fourteenth Monthly Fee Statements. Those reductions are reflected in the Application.

If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher than 10% or more, did you discuss the reasons for the variation with the Client?

Response: N/A

Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

Response: No.

Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: Yes, Ken Kansa spent 0.9 hours reviewing fee application records for such information, resulting in \$1,014.00 in fees during the Fifth Interim Fee Application. Throughout the entirety of the Final Fee Period, Ken Kansa spent 4.5 hours reviewing fee application records for such information, resulting in \$5,352.00 in fees.

If the fee application includes any rate increase since retention:

- a. Did your client review and approve those rate increases in advance?
- b. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not to agree to modify rates or terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458?

Response: This Application reflects the standard rate increases reflected beginning with the Second Interim Fee Application and the in this Application. The hourly rates were billed in accordance with B&T's rates and procedures in effect during the Fifth Interim Fee Period and the Final Fee Period and in accordance with the Retention Order. B&T disclosed its practice of periodically adjusting its hourly rates in the materials submitted with its retention application in these Chapter 11 Cases [Docket No. 184], including its engagement letter, which was agreed to by the Special Committee in connection with B&T's retention in these cases.

Dated: February 27, 2026
Houston, Texas

/s/ Vincent P. (Trace) Schmeltz III
Vincent P. (Trace) Schmeltz III
Partner, Barnes & Thornburg LLP
One N. Wacker Drive, Suite 4400
Chicago, Illinois 60606-2833
Telephone: 312-214-4830
Facsimile: 312-759-5646
Email: Trace.Schmeltz@btlaw.com

Exhibit A

September 2025

Time Records and Expenses

BARNES & THORNBURG LLP

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

Invoice 3488576

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

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

PAYABLE UPON RECEIPT

Fees for Services	\$	460,615.00
Other Charges	\$	13,815.68
Total This Invoice	\$	474,430.68

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 3488576

Page 2

October 29, 2025
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 September 30, 2025 as described on the attached detail.

Fees for Services	\$	460,615.00
Other Charges	\$	<u>13,815.68</u>
Total This Invoice	\$	474,430.68

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

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FIDUCIARY DUTY INVESTIGATION

Summary of Invoice

Date	Name	Description	Hours	Amount
09/01/25	Anna Bninski	Research authorities on Texas trust law.	1.30	656.50
09/01/25	Aaron Gavant	Communications with BT team regarding analysis of special committee authority issues (.2); tend to follow up issues relating to same (.3).	0.50	452.50
09/01/25	Leah O'Farrell	Research regarding the Special Committee's options following SAFE claim ruling.	2.70	1,795.50
09/01/25	Trace (Vincent P.) Schmeltz	Strategy call with team regarding SAFE objection ruling and next steps (.5); conference call with SAFE AHG on settlements (.7); call with D. Eaton and S. Wells regarding next steps (.4); conference call with K. Kansa and C. Underwood regarding updates and settlement documentation questions (.4); review e-mails from client (.2).	2.20	2,200.00
09/01/25	Charlotte Underwood	Prepare for and participate in call with client regarding SAFE objection ruling (.5); call with SAFE AHG regarding ruling (.7); call with K. Kansa and T. Schmeltz regarding updates and settlement documentation questions (.4); communication with team following up regarding work streams and next steps (1.0).	2.60	2,782.00
09/01/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.6); continue privilege log review and revisions (3.9).	4.50	3,240.00
09/01/25	Kenneth Kansa	Emails with C. Underwood on updates (.2); call with T. Schmeltz and C. Underwood on same and settlement documentation questions (.4); further emails with C. Underwood on updates (.1); review materials on Special Committee questions from D. Eaton and points for 9/3 board meeting (1.7); email to L. O'Farrell and T. Wagner on research for same (.3); email to A. Gavant on board questions (.1); email to T. Schmeltz on same (.1); review J. Perez decision on SAFEs (.7); further research on board questions and outline responses for same (.9).	4.50	5,422.50
09/02/25	Anita Peterson	Communications with investigation team	0.20	81.00

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

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		regarding Court's ruling on SAFE objection and assist attorneys in executing strategy per request of C. Underwood.		
09/02/25	Anita Peterson	Review communications with B. Funk regarding tax analysis and assist attorneys in executing strategy per request of T. Schmeltz.	0.20	81.00
09/02/25	Leah O'Farrell	Continue research regarding Special Committee's options following SAFE claim ruling (1.3); email to K. Kansa regarding same (.2).	1.50	997.50
09/02/25	Aaron Gavant	Review and analysis of Special Committee appointment resolutions in connection with anticipated next steps (1.0); draft, revise and provide comments on summary of analysis (.5); multiple communications with BT team regarding same (.5).	2.00	1,810.00
09/02/25	Anna Bninski	Review privilege log, making revisions and expanding explanations for privilege grounds (6.5); communications with P. Lohse regarding same (.2).	6.70	3,383.50
09/02/25	Trace (Vincent P.) Schmeltz	Call with M. Robinson, D. Eaton and S. Wells regarding next steps and settlements in light of SAFE claim ruling (1.0); conference calls with B. Funk (.2), M. Robinson (.7), D. Eaton (.2), R. Mates (.2), C. Raver and C. Underwood (.2) regarding various aspects of potential new plan and settlement with insurance carriers; consider strategy and next steps in light of new developments (1.0); confer with SAFE AHG on plan settlements (1.0); emails with various constituencies regarding incorporation of settlements into potential new plan (.2); confer with D. Eaton, S. Wells and M. Robinson regarding next steps (.4); meeting with D. Dunn, M. Robinson, P. Tomasco, K. Kansa, C. Underwood, D. Eaton, and S. Wells regarding plan approach (1.1); call with tax team and SAFE AHG on next steps following SAFE claim ruling (.4); attend to scheduling, next steps and work planning (.3); update Board regarding next steps in light of court ruling (1.1); further conference with tax team (.6); confer with C.	9.50	9,500.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Topping regarding next steps (.9).		
09/02/25	Charlotte Underwood	Meeting with Special Committee, P. Tomasco, Province and BT Team regarding plan approach (1.1); confer with C. Raver and T. Schmeltz regarding insurance settlement (.2); and related follow up (.2); confer with client regarding matter strategy (.4); communication with T. Schmeltz regarding correspondence from B. Funk (.1); communications with K. Kansa and T. Schmeltz regarding SAFE call (.2).	2.20	2,354.00
09/02/25	Paige Lohse	Continue preparations for opposition to LKC Fee application (.5); analyze and send correspondence and filings regarding recent developments (.5); continue to review and revise privilege log (1.8).	2.80	2,016.00
09/02/25	Kenneth Kansa	Telephone conference with M. Robinson regarding intercompany claims (.2); call with Special Committee, M. Robinson, and team on plan approach (.3); meeting with Special Committee, P. Tomasco, M. Robinson, D. Dunn, and BT team on approach to 9/3 board meeting (1.1); draft research on issues raised by D. Eaton and email to T. Schmeltz on same (.4); email to N. He on contribution agreements (.1); further call with BT team on next steps regarding plan process and board meeting (.6); participate in tax call with C. Wheeler, A. Popsecu (.6); review C. Underwood follow-up emails from calls (.3); review PSA party emails (.2); review board meeting materials (.4); review plan-related materials and communications (1.3).	5.50	6,627.50
09/02/25	Carrie M. Raver	Participate in call with T. Schmeltz and C. Underwood regarding insurance issues given Court ruling.	0.20	190.00
09/02/25	Carrie M. Raver	Evaluate past insurer and Transcend communications regarding coverage (1.3); communication with T. Schmeltz regarding the same (.2).	1.50	1,425.00
09/02/25	Ning He	Analyze issues regarding standing to bring suit.	2.40	2,076.00
09/02/25	Trace (Vincent	Further call with BT team on next steps	0.60	600.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
	P.) Schmeltz	regarding plan process and board meeting.		
09/03/25	Lydia Parks	Review local, federal, and Judge's rules pertaining to a specific deadline (.5); review the docket regarding status of potential motion (.2).	0.70	339.50
09/03/25	Anita Peterson	Review communication with Clients regarding fees and costs and assist attorneys in executing strategy per request of T. Schmeltz (.2); communications with timekeepers regarding monthly fee statement (.1); review communication with J. Wolfshohl regarding 2004 discovery and response to motion to quash and assist attorneys in executing strategy per request of T. Schmeltz (.2); communications with investigation team regarding Court's ruling on SAFE objection and assist attorneys in executing strategy per request of A. Bninski (.6); review communications with investigative team regarding call with SAFE and assist attorneys in executing strategy per request of P. Lohse (.2).	1.30	526.50
09/03/25	Anita Peterson	Review communication with P. Tomasco regarding contribution agreement and assist attorneys in executing strategy per request of T. Schmeltz (.1); communication with investigation 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).	0.30	121.50
09/03/25	Anita Peterson	Review communication with C. Topping regarding amended plan and assist attorneys in executing strategy per request of T. Schmeltz (.2); communications with investigative team regarding same (.1); review communication with C. Topping regarding SAFE document and assist attorneys in executing strategy per request of T. Schmeltz (.2); communications with investigative team regarding same (.1); review communication with C. Topping regarding board consent and assist attorneys in executing strategy per request of T. Schmeltz (.2); communications with investigative team regarding same (.1).	0.90	364.50
09/03/25	Anna Bninski	Finalize review of privilege log portion line by	8.00	4,040.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		line, making revisions and expanding explanations for privilege grounds (2.5); communications with P. Lohse regarding Reply in support of motion to quash LKC's discovery demand (.5); review materials relating to same (1.5); commence drafting of Reply brief (3.5).		
09/03/25	Trace (Vincent P.) Schmeltz	Conference call with M. Robinson on settlement effects from SAFE claims ruling (.4); confer with C. Wheeler on tax analysis of same (.1); extensive call with SAFE AHG regarding tax analysis (1.9); conference call with M. Hurley and S. Schultz regarding next steps (.3); confer with M. Robinson regarding strategy (.3); confer with Class A shareholder representatives regarding next steps (1.1); confer with D. Eaton, S. Wells, K. Kansa, and M. Robinson regarding strategy (.5); attend Board of Directors meeting (1.3); confer with P. Lohse regarding LKC issues (.3); confer with D. Eaton, S. Wells, J. Stokes, the Blackmons, and C. Topping (.5); confer with SAFE AHG regarding LKC (.7).	7.40	7,400.00
09/03/25	Paige Lohse	Continue preparations for opposition to LKC Fee application (4.1); confer with T. Schmeltz regarding work needed (.3); analyze and send correspondence and filings regarding recent developments (.3); continue to review and revise privilege log (2.2); telephone conference with K. Kansa regarding claims issues (.2)..	7.10	5,112.00
09/03/25	Kenneth Kansa	Participate in catch-up call (in part) (.5); participate in pre-board call prep session with Special Committee and BT team (.5); office conference with T. Schmeltz on board meeting and plan structuring (.3); email to A. Bninski on docketing materials (.1); review C. Underwood call notes (.2); review incoming pleadings (.3); review Board materials (.2); review P. Lohse notes on discussions with SAFEs (.2); emails to/from P. Lohse on discovery issues (.3)	2.60	3,133.00
09/03/25	Kathleen L. Matsoukas	Review and analyze Whinstone pleadings and related documents as related to alleged estate claim and communicate with team regarding same.	0.80	704.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
09/03/25	Charlotte Underwood	Prepare for and participate in call with counsel for Transcend and counsel for Class A (1.1); review potential estate claims (.3); communications with team regarding damages analysis (.2).	1.60	1,712.00
09/03/25	Ning He	Analyze issues regarding standing (.5); analyze issues regarding warrants (.3).	0.80	692.00
09/03/25	Trace (Vincent P.) Schmeltz	Office conference with K. Kansa regarding board meeting and plan structuring.	0.30	300.00
09/04/25	Anita Peterson	Review communications with Akin forwarding requested information and assist attorneys in executing strategy per request of T. Schmeltz (.2); communications with M. Robinson, A. Popescu regarding same and assist attorneys in executing strategy per request of T. Schmeltz (.2); communications with investigative team regarding amended plan (.1); communications with investigative team regarding contribution agreements (.1); communications with investigation team regarding J. Caytas employment by Porter Hedges (.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 Reply in Support of Motion to Quash and assist attorneys in executing strategy per request of T. Schmeltz (.4); review and revise summary of fees for monthly fee statement (1.2); communications with billing clerk (K. Phillips) regarding monthly fee statement (.2).	2.90	1,174.50
09/04/25	Joseph Kipp	Communication with P. Lohse regarding factual background for conducting relevant legal research.	0.60	291.00
09/04/25	Joseph Kipp	Review the Special Committee Mediation Statement of Agreed Facts and the Special Committee Investigation Report regarding background for requested legal research per request of P. Lohse.	1.00	485.00
09/04/25	Joseph Kipp	Conduct research regarding the effect of statutes of limitations.	0.40	194.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
09/04/25	Anna Bninski	Finalize first draft of Reply brief in support of motion to quash LKC's discovery demand (5.6); research additional topics per request of P. Lohse (2.9); correspond with R. Kaltenmark regarding tax regulation (.3); draft additions to Reply brief (1.7).	10.50	5,302.50
09/04/25	Trace (Vincent P.) Schmeltz	Return and review e-mails regarding various subjects including D&O settlement, taxes, SAFE AHG strategy, and new plan (1.5); call with R. Mates on settlement revisions (.2); call with C. Topping on pending issues (.5); communication with C. Raver on insurers' issues (.2); prepare for (.4) and participate in (.5) call with J. Wolfshohl on LKC issues (.2); calls with D. Eaton on settlement revisions (.7); consider strategy and next steps (.4).	4.60	4,600.00
09/04/25	Lydia Parks	Review a historic settlement agreement and summarize terms of same (.5); review proof of claim for potential objection (.9); telephone call with K. Kansa regarding the same (.1); share findings with the team (.1); review document database (.2).	1.80	873.00
09/04/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (2.6); revise draft of reply brief in support of motion to quash (5.5); analyze potential third-party claims (2.6).	10.70	7,704.00
09/04/25	Kenneth Kansa	Telephone conference with L. Parks on outstanding proofs of claim for investigation/potential objection (.1); email to L. Parks on same (.1); email to T. Schmeltz on information request to C. Topping regarding prepetition claims (.1); review update emails on settlement process from T. Schmeltz (.3); review LKC emails (.2); telephone conference with P. Lohse on claims issues (.2)	1.00	1,205.00
09/04/25	Charlotte Underwood	Communications with P. Lohse regarding multiple work streams (.2); communications with T. Schmeltz and C. Raver regarding settlement and plan strategy (.4); review documents and communications with team regarding potential additional estate claims (.5); follow up related to SAFE cash rec questions (.2).	1.30	1,391.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
09/04/25	Ning He	Analyze issues regarding potential claims (1.2); analyze SAFE document (.3); analyze background issues on SAFE agreements (.5).	2.00	1,730.00
09/05/25	Joseph Kipp	Conduct research on the scope and effect of bankruptcy code on potential claims.	1.00	485.00
09/05/25	Joseph Kipp	Communication with P. Lohse regarding document review.	0.50	242.50
09/05/25	Joseph Kipp	Review and revise Special Committee's Reply in support of its Motion to Quash LKC Discovery Request.	1.10	533.50
09/05/25	Joseph Kipp	Search Verita Bankruptcy Administration System to identify creditors against Rhodium Encore LLC.	0.40	194.00
09/05/25	Joseph Kipp	Search Everlaw database regarding potential contract claims.	1.30	630.50
09/05/25	Anita Peterson	Review communications with Client regarding Rhodium fees (.2); 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 B. Funk regarding investigation report and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with C. Topping regarding SAFE agreements and assist attorneys in executing strategy per request of T. Schmeltz (.2); review and revise summary of fees for monthly fee statement (1.5); review as-filed 2025-09-05 (Dkt 1614) Special Committee Reply in Support of Its Motion to Quash LKC LLP's First Set of Requests for Production and Interrogatories to Debtors Pursuant to Bankruptcy Rule 2004 and assist attorneys in executing strategy per request of P. Lohse (.2).	2.60	1,053.00
09/05/25	Anna Bninski	Edit reply brief in support of Special Committee's motion to quash (1.8); implement edits from stakeholders to same (3.5); chart arguments made in successive round of briefing (1.5); further edits to reply brief (.3); review correspondence to ensure accuracy of brief (.7); coordinate filing of brief (.3).	8.10	4,090.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
09/05/25	Trace (Vincent P.) Schmeltz	Confer with J. Melnick, C. Raver, and R. Greene on insurance issues (.4); confer with R. Mates on settlement (.8); consider next steps in light of conversation with R. Mates (.3); confer with SAFE AHG on settlement structure (.8); confer with D. Eaton on same (.2); confer with B. Funk on settlement issues (.3); consider strategy for resolution of disputes (.2); confer with M. Hurley, M. Robinson, and P. Tomasco on next steps (1.4); confer with team regarding tax questions (.8); confer with Class A shareholders on settlements (.7).	5.90	5,900.00
09/05/25	Paige Lohse	Revise and finalize reply brief in support of motion to quash (4.7); analyze potential third-party claims (.8).	5.50	3,960.00
09/05/25	Kenneth Kansa	Review C. Topping email on documents for potential objection.	0.10	120.50
09/05/25	Carrie M. Raver	Correspond regarding times to discuss court ruling and insurance.	0.20	190.00
09/05/25	Carrie M. Raver	Call with mediator and T. Schmeltz regarding insurance issues.	0.40	380.00
09/05/25	Carrie M. Raver	Participate in insurance call with team and mediator.	0.20	190.00
09/05/25	Carrie M. Raver	Call with insurers regarding Court ruling and insurance issues.	0.60	570.00
09/05/25	Randal J. Kaltenmark	Revise tax provisions of draft reply brief (1.7); emails with P. Lohse and A. Bninski regarding same (.2).	1.90	1,957.00
09/05/25	Charlotte Underwood	Confer with team regarding insurance settlement.	0.20	214.00
09/05/25	Ning He	Analyze warrant issues (.3); analyze reply brief regarding LKC (1.5); analyze Camara concerns (1.2).	3.00	2,595.00
09/06/25	Anna Bninski	Review correspondence from T. Schmeltz regarding reply brief filing.	0.10	50.50
09/06/25	Trace (Vincent P.) Schmeltz	Conference call with M. Robinson and A. Popescu regarding financial analysis and strategy (1.4); conference call with D. Eaton, S. Wells, M. Robinson, and A. Popescu regarding strategy (.7); e-mail exchange with SAFE AHG	2.30	2,300.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		on settlements (.2).		
09/06/25	Paige Lohse	Continue to review and revise privilege log.	2.70	1,944.00
09/07/25	Anita Peterson	Review communication with Akin forwarding updated privilege log and assist attorneys in executing strategy per request of P. Lohse.	0.10	40.50
09/07/25	Trace (Vincent P.) Schmeltz	Call with D. Eaton regarding strategy (.4); text exchange with M. Robinson regarding next steps (.3); call with SAFE AHG on potential settlements (.4); call with M. Robinson regarding next steps (.3); call with D. Eaton regarding next steps (.2); text exchange with R. Mates on potential settlements (.2).	1.80	1,800.00
09/07/25	Paige Lohse	Continue to review and revise privilege log.	0.50	360.00
09/08/25	Joseph Kipp	Review, and summarize energy sales agreements between TempleGreen, Rhodium, and third-party energy suppliers (2.3); draft memorandum regarding key information (.6).	2.90	1,406.50
09/08/25	Joseph Kipp	Communication with P. Lohse regarding research and fact assessment strategies (.2); review agreements to identify potential claims (1.1).	1.30	630.50
09/08/25	Joseph Kipp	Office conference with K. Kansa regarding contract question (.1); research and review Sale Order and Purchase Agreement between Rhodium and Temple Green (2.6); draft summary memorandum with key facts (.6).	3.30	1,600.50
09/08/25	Kevin Warren	Research to assist in evaluating potential third-party claims.	2.80	1,358.00
09/08/25	Charlotte Underwood	Call with counsel for SAFE AHG regarding hearing and other matters (.5); confer with counsel for Debtors and Province on preparation for hearing (.5); coordinate with P. Lohse and team regarding ongoing work streams (.6).	1.60	1,712.00
09/08/25	Anita Peterson	Review and revise summary of fees for monthly fee statement (1.8); communications with investigation team regarding hearings and assist attorneys in executing strategy per request of T. Schmeltz (.2); precise tracking and timely updates of deadlines and filings (.1);	3.20	1,296.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		review communications with Akin regarding call in advance of hearings and assist attorneys in executing strategy per request of T. Schmeltz (.2); review as-filed 2025-09-05 (Dkt 1612) Order Granting [Founders'] Motion Modifying Automatic Stay to Allow Advancement of Defense Costs Under Debtors' D&O Insurance (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3); communications with investigative team regarding Temple Green and assist attorneys in executing strategy per request of P. Lohse (.2); review communications with J. Wolfshohl regarding motion to quash and assist attorneys in executing strategy per request of P. Lohse (.2).		
09/08/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.3); analyze potential third-party claims (3.9); call with T. Schmeltz (.3); continue to review and revise privilege log (.4); draft motion for extension for LKC fee objection (1.1).	6.00	4,320.00
09/08/25	Lydia Parks	Analyze potential claims against a third party.	1.30	630.50
09/08/25	Anna Bninski	Update case information trackers per request of P. Lohse (.4); review investigation team correspondence regarding Order from the bankruptcy court (.1).	0.50	252.50
09/08/25	Kenneth Kansa	Participate in prep call for hearing (.5); email to C. Underwood on appeal timing (.1); review incoming pleadings (.1); review and research P. Lohse email on forward contract question (.3); office conference with J. Kipp on same (.1).	1.10	1,325.50
09/08/25	Trace (Vincent P.) Schmeltz	Calls with D. Eaton (.1); M. Robinson (.2), R. Mates (.3), C. Topping (.4), SAFE AHG (.6), D. Eaton (.1), P. Tomasco (.2), M. Robinson (.1), Class A shareholders (.3), client team (.3), SAFE AHG (.3), R. Mates and M. Robinson (.7), all on settlement issues and next steps; work planning (.1), calls with B. Funk (.1), M. Robinson (.3) on settlements; call with P. Lohse on LKC (.3), respond to e-mails from	5.40	5,400.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		stakeholders on settlements (.6), analyze third-party claims (.4).		
09/08/25	Carrie M. Raver	Call with C. Topping in advance of broker call regarding the extension of current policies.	0.20	190.00
09/08/25	Carrie M. Raver	Participate in call with C. Topping and broker personnel to discuss issues regarding the extension of current policies.	0.30	285.00
09/08/25	Ning He	Analyze issues regarding Camaras' concerns (2.2); confer with Quinn Emanuel regarding warrants (.3); confer with Province regarding warrants (.4).	2.90	2,508.50
09/08/25	Kathleen L. Matsoukas	Draft and revise motion for extension of time to respond to LKC fee objection (3.9); communicate with P. Lohse regarding motion and timing for same (.4); review fee application and relevant documents in connection with drafting (.8).	5.10	4,488.00
09/08/25	Kathleen Mangan	Communications with P. Lohse regarding defamation claim analysis.	0.30	145.50
09/08/25	Kathleen Mangan	Research regarding potential defamation claims.	2.00	970.00
09/09/25	Joseph Kipp	Review Rhodium and Temple Green's Purchase Agreement and attached Sale Order.	1.20	582.00
09/09/25	Joseph Kipp	Review court docket to identify documents regarding Temple Green.	1.00	485.00
09/09/25	Joseph Kipp	Communication with P. Lohse regarding Purchase Agreement and Sale Order.	0.20	97.00
09/09/25	Joseph Kipp	Research Texas bankruptcy case law regarding effect of Section 363(f) of the federal Bankruptcy Code as it pertains to the Sale Order.	1.40	679.00
09/09/25	Joseph Kipp	Review Rhodium's communications and agreements with Kelvion per request of P. Lohse.	1.40	679.00
09/09/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.3); analyze potential third-party claims (1.8); revise and further prepare motion for extension for LKC fee objection (1.6).	3.70	2,664.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
09/09/25	Lydia Parks	Analyze and draft analysis of a third-party claim (1.1); communications with P. Lohse regarding same (.3); review local rules pertaining to specific motion practice (.2).	1.60	776.00
09/09/25	Anita Peterson	Review communication with counsel for founders regarding proposal and assist attorneys in executing strategy per request of T. Schmeltz (.2); communications with investigation team regarding response to same (.1); review communication with J. Wolfshohl forwarding draft Emergency Motion of the Special Committee for an Extension to File a Response to LKC LLP's Final Application for Payment of Compensation and assist attorneys in executing strategy per request of P. Lohse (.2); review and revise summary of fees for monthly fee statement (2.0).	2.50	1,012.50
09/09/25	Kathleen L. Matsoukas	Revise draft motion to extend deadline for objections and communicated with P. Lohse and T. Schmeltz regarding same (.5); participate in discussion with Debtors' counsel regarding motion for extension and strategy for same (.5).	1.00	880.00
09/09/25	Kevin Warren	Draft analysis regarding research to assist in evaluating potential third-party claims for P. Lohse.	2.20	1,067.00
09/09/25	Kenneth Kansa	Telephone conference with S. Schultz, M. Hurley, T. Schmeltz on plan term sheet (.4); follow-up telephone conference with T. Schmeltz on same (.1); telephone conference N. He on plan question (.1); review P. Lohse question on basis for extension to object to LKC fee app and email P. Lohse on same (.2); follow-up email to P. Lohse on same (.1); review and revise initial draft of Plan term sheet (1.7)	2.60	3,133.00
09/09/25	Anna Brinski	Correspond with P. Lohse regarding appeal of court order overruling Debtors' omnibus objection (.1); research in local and federal rules relating to same (1.1); prepare appeal material (1.2).	2.40	1,212.00
09/09/25	Trace (Vincent P.) Schmeltz	Address potential plan support agreement negotiations (1.8), call with J. Wolfshohl	4.50	4,500.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		regarding LKC (.6), address potential appeal of SAFE claims order (.1), call with R. Mates on potential settlement (.2), call with M. Robinson regarding same (.2); address LKC motion (1.2), call with M. Hurley on potential settlement (.2), further call with R. Mates on same (.2).		
09/09/25	Ning He	Analyze issues regarding LKC (.4); revise analysis regarding Camaras' concerns (1.2); telephone conference with K. Kansa on plan question (.1).	1.70	1,470.50
09/09/25	Kathleen Mangan	Research regarding success of potential claims.	7.80	3,783.00
09/09/25	Trace (Vincent P.) Schmeltz	Telephone conference with S. Schultz, M. Hurley, K. Kansa on plan term sheet.	0.40	400.00
09/09/25	Trace (Vincent P.) Schmeltz	Follow up telephone conference with K. Kansa regarding plan term sheet.	0.10	100.00
09/10/25	Anita Peterson	Review and revise summary of fees for monthly fee statement (2.8); communications with investigation team regarding response to counsel for founders regarding proposal and assist attorneys in executing strategy per request of P. Lohse (.2).	3.00	1,215.00
09/10/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.2); analyze potential third-party claims (.5); revise and further prepare motion for extension for LKC fee objection (.2), draft motion for leave to file under seal (.7); finalize documents for filing (.6).	2.20	1,584.00
09/10/25	Anna Brinski	Prepare filings at request of P. Lohse, relating to motion to file under seal and motion for extension of time (2.5); research related rules (.6); prepare proposed redactions of motion for extension of time (.3).	3.40	1,717.00
09/10/25	Kenneth Kansa	Call with Akin Gump team and T. Schmeltz on SAFEs' issues (.6); t/c with Special Committee, M. Robinson, and T. Schmeltz on settlement discussions (.7); review LKC pleading from P. Lohse (.1); email to P. Lohse on same (.1); research substantive consolidation points and case law cited by SAFEs (1.2); meet with T. Schmeltz on same (.2); review settlement-	3.40	4,097.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		related materials (.2); review of plan materials (.3).		
09/10/25	Trace (Vincent P.) Schmeltz	Prepare for and attend tax call (1.2); calls with Imperium on potential settlement (.6); e-mails and texts regarding potential plan support agreement (.2); e-mails with LKC (.3); communications with P. Lohse regarding LKC strategy (.2); call with client team on potential plan support agreement (.3); communications with R. Mates regarding same (.4); review substantive contribution caselaw (.2); call with Akin Gump team and K. Kansa on SAFEs' issues (.6); call with Special Committee, M. Robinson, and K. Kansa on settlement discussions (.7); meet with K. Kansa on substantial contribution issues (.2).	4.90	4,900.00
09/10/25	Ning He	Revise and finalize filing for reply brief regarding LKC issue (4.8); analyze issues regarding potential claims (.5).	5.30	4,584.50
09/11/25	Anita Peterson	Review and revise summary of fees for monthly fee statement (1.9); communications with T. Schmeltz regarding monthly fee statement (.2); communications with K. Kansa regarding monthly fee statement (.3); communications with Quinn Emanuel regarding sealed filing (.2); emails with P. Lohse and C. Underwood regarding 2025-09-10 filings (.2); review as-filed 2025-09-10 (Dkt 1627) Special Committee's Motion to Seal its Emergency Motion, 2025-09-10 (Dkt 1627-1) Proposed Order Granting Special Committee's Motion for Seal its Emergency Motion, 2025-09-10 [Sealed] Emergency Motion of Special Committee for Extension to File Response to LKC, 2025-09-10 (Dkt 1629) Stipulation and Order on Certain Claims Included in Debtors' Omnibus Claims Objection at Docket No. 1488 and assist attorneys in executing strategy per request of P. Lohse (.4); communications with investigation team regarding third-party claims analysis and assist attorneys in executing strategy per request of T. Schmeltz (.3).	3.50	1,417.50
09/11/25	Aaron Gavant	Multiple communications relating to plan	0.50	452.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		developments and ongoing negotiations.		
09/11/25	Paige Lohse	Follow up on motion for extension (.8); analyze potential third-party claims (2.1).	2.90	2,088.00
09/11/25	Lydia Parks	Analyze and synthesize potential third-party claims.	3.70	1,794.50
09/11/25	Anna Brinski	Correspond with P. Lohse regarding certificate of service for motion filed under seal (.2); review filing to clarify scope of request and follow up regarding same (.2); research regarding same (.9); correspond with N. He regarding same (.2).	1.50	757.50
09/11/25	Kenneth Kansa	Participate in board prep call with client, M. Robinson, P. Tomasco, T. Schmeltz (.5); email to S. Schultz on support for sub con claims (.1); emails to L. Parks on automatic stay question (.1); email to T. Schmeltz on call (.1); review substantive consolidation materials (.5); review incoming pleadings (.1); review T. Schmeltz email on third-party claims (.1).	1.50	1,807.50
09/11/25	Trace (Vincent P.) Schmeltz	Calls with D. Eaton (.2), R. Mates (.2), C. Potter and B. Funk (.5), M. Robinson (1.4), all on settlement structure and terms; calls with Special Committee on same (.7); call with M. Hurley and D. Proman on settlement structure and terms (.3); further call with M. Robinson on same (.6); address Board concerns (.5); participate in pre-call for Board meeting with Special Committee, M. Robinson, P. Tomasco, and K. Kansa (.5).	4.90	4,900.00
09/11/25	Ning He	Revise notice of appeal (.8); analyze documents regarding contribution agreements (1.3).	2.10	1,816.50
09/12/25	Joseph Kipp	Review Rhodium's communications with various Kelvion employees to identify legally binding agreements between the parties.	1.30	630.50
09/12/25	Joseph Kipp	Analyze Delaware case law concerning the enforcement of arbitration clauses.	2.70	1,309.50
09/12/25	Anita Peterson	Communications with Quinn Emanuel regarding filings (.1); review communications with Porter Hedges forwarding 2025-09-10 [Sealed] Emergency Motion of Special Committee for Extension to File Response to LKC, requesting copies of response they filed under seal and	2.10	850.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		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 communications with Quinn Emanuel regarding draft Debtors' Notice of Appeal and assist attorneys in executing strategy per request of T. Schmeltz (.2); communications with investigation team regarding same (.1); review communications with P. Tomasco, Clients, Province Firm regarding SAFE agreement and assist attorneys in executing strategy per request of T. Schmeltz (.2); review incoming 2025-09-11 (Dkt 1632) LKC's Response to Special Committee's Emergency Motion for Extension of Time, 2025-09-11 (Dkt 1633) [Sealed] LKC's Response to Special Committee's Emergency Motion for Extension of Time, 2025-09-11 (Dkt 1634) LKC's Motion for Entry of an Order Authorizing Sealing of Response to Special Committee's Emergency Motion for Extension of Time, 2025-09-12 (Dkt 1638) Response and Joinder of SAFE to Special Committee's Motion for Extension to File Response to LKC and assist attorneys in executing strategy per request of P. Lohse (.3); communications with investigative team regarding same (.2); review communications with Akin regarding SAFE Agreement discussions (.1); review communications with Province Firm, Clients, P. Tomasco regarding same (.1); communications with investigative team regarding J. Norr and Temple (.2); review communications with B. Funk and C. Potter regarding same (.1).		
09/12/25	Anna Bninski	Cross-check affected parties with service list on proposed notice of appeal, including compilation of additional counsel contact information (.9); communication with N. He regarding same and edits to notice (.4); make proposed edits (.3); correspond with N. He regarding same (.2).	1.80	909.00
09/12/25	Paige Lohse	Continue to analyze and revise potential third-party claims.	5.70	4,104.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
09/12/25	Kenneth Kansa	Plan call with Special Committee, P. Tomasco, M. Robinson, T. Schmeltz (1.0); email N. He regarding contribution agreement (.1); draft email memo to client on substantive consolidation considerations (.4); email to P. Lohse on discovery question (.1); t/c to T. Schmeltz on settlement issues (.1); review notice of appeal on SAFEs' decision (.1).	1.80	2,169.00
09/12/25	Trace (Vincent P.) Schmeltz	Attend team call (1.0); calls with M. Robinson on settlements (1.2); address SAFE contribution agreement question (.1); address tax issues (.6); call with K. Kansa regarding incorporation of settlement into plan (.1); call with B. Funk and C. Potter on settlement issues (.3); call with C. Topping and C. Blackmon on same (.4); work on third-party claims (.7).	4.40	4,400.00
09/12/25	Carrie M. Raver	Address case correspondence.	0.20	190.00
09/12/25	Ning He	Summarize analysis regarding Fairbairn complaints.	1.00	865.00
09/13/25	Anna Bninski	Review investigation team correspondence relating to Special Committee's emergency motion and analysis of opposition.	0.10	50.50
09/13/25	Anita Peterson	Review communications with Province Firm, Clients, P. Tomasco regarding SAFE Agreement discussions and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communication with C. Topping regarding LKC's response (.1).	0.30	121.50
09/13/25	Aaron Gavant	Review proposed SAFE plan terms (.4); communications with BT team regarding same (.1).	0.50	452.50
09/13/25	Kenneth Kansa	Conference call with client, M. Robinson, D. Dunn, P. Tomasco, and T. Schmeltz on plan status and settlement proposals (1.0); conference call with client and SAFE representatives on settlement proposal to SAFE AHG (.7); review Plan materials and settlement structure (.6).	2.30	2,771.50
09/13/25	Trace (Vincent P.) Schmeltz	Team call on settlements and incorporation of same into plan (1.0); call with client and SAFEs on settlements (.7); with S. Wells (.2), D. Eaton	3.60	3,600.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.2), M. Hurley (.2), R. Mates (.3), M. Robinson (.1) Imperium (.7), D. Dunn (.2), all on settlements and development of plan incorporation of settlements..		
09/14/25	Anna Bninski	Prepare certificate of service reflecting service outside of CM/ECF.	0.20	101.00
09/14/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments including response and SAFE's joinder briefing relating to motion for extension to object to LKC's final fee application.	0.60	432.00
09/14/25	Kenneth Kansa	Review SAFE AHG emails on substantial contribution (.2); research substantial contribution questions (.6); communications with T. Schmeltz on Plan negotiations and SAFE AHG discussions (.2); call with T. Schmeltz on settlement structure (.1); review additional research on same (.8).	1.90	2,289.50
09/14/25	Trace (Vincent P.) Schmeltz	Calls with M. Robinson (.6), D. Eaton (.3), D. Dunn (.2), P. Tomasco (.1), K. Kansa (.1), full client team (.4), and M. Hurley and D. Proman (.2), all on settlement structure and incorporation into plan; review caselaw and perform research in aid of plan (1.3).	3.20	3,200.00
09/15/25	Charlotte Underwood	Participate in call with client and Province regarding plan strategy.	1.10	1,177.00
09/15/25	Anita Peterson	Assist attorneys in executing strategy relating to invoice for July fees per request of T. Schmeltz (.2); communications with A. Popescu, Company regarding invoice for July fees (.2); review communication with Quinn Emanuel regarding interest and assist attorneys in executing strategy per request of C. Underwood (.2).	0.60	243.00
09/15/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.4); evaluate reply in support of motion for extension (.5).	0.90	648.00
09/15/25	Aaron Gavant	Consideration of proposed SAFE plan terms (.4); communications with BT team regarding same (.1).	0.50	452.50
09/15/25	Anna Bninski	Review investigation team correspondence	0.10	50.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		relating to post-petition interest on contingent claims.		
09/15/25	Trace (Vincent P.) Schmeltz	Call with Special Committee, D. Dunn, M. Robinson, and K. Kansa on negotiations and settlement proposals (1.5); call with M. Robinson, B. Funk and M. Fox on same (.9); multiple calls in aid of settlements and incorporation of settlements into plan, with R. Mates, M. Hurley, the BRIC, and client team (6.5); confer with K. Kansa on settlement structuring and incorporation into plan (.2); draft certain terms for same (.1), revise term sheet (.4).	9.60	9,600.00
09/15/25	Kathleen L. Matsoukas	Prepare for and participate in discussion with client regarding upcoming plan negotiation discussions.	0.60	528.00
09/15/25	Kenneth Kansa	Morning call with client, M. Robinson, D. Dunn, T. Schmeltz on settlement proposals and negotiations with stakeholders (1.5); review revised cash reconciliation file from A. Popescu (.1); email to P. Lohse on filing of reply (.1); research postpetition interest question (.5); email to A. Gavant on same (.1); email to client on plan draft timing and preparation (.2); t/c T. Schmeltz on updated discussions with Imperium (.1); email to C. Underwood on discussions with SAFE AHG (.1); t/c D. Eaton on substantial contribution question (.2); conference call with Special Committee and SAFE AHG on settlement proposal (.3); email to T. Schmeltz on plan structure (.1); t/c M. Robinson regarding same (.2); further t/c M. Robinson on plan contents and revisions (.2); t/c D. Eaton on same (.2); t/cs T. Schmeltz on PSA/term sheet preparation (.2); initial review of draft plan from debtors' counsel (.2); draft language for substantial contribution provision of plan and email to Special Committee on same (.1); review T. Schmeltz draft of summary language for settlement to SAFE AHG (.1); draft Plan term sheet (1.9); circulate same to Special Committee team with covering comments (.1); revise same based on comments received and	10.90	13,134.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		re-circulate to Special Committee team (.3); draft plan support agreement to accompany term sheet (.9); circulate same to Special Committee team with covering comments (.1); begin plan revisions to reflect revised settlement structure (3.1).		
09/16/25	Anita Peterson	Assist attorneys in executing strategy per request of T. Schmeltz focusing on precise tracking and timely updates of deadlines and filings.	0.20	81.00
09/16/25	Kathleen L. Matsoukas	Communicate with P. Lohse regarding motion for leave to file reply brief and associated filings.	0.20	176.00
09/16/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.2); continue to evaluate reply in support of motion for extension (.3).	0.50	360.00
09/16/25	Kenneth Kansa	Draft and revise Second Amended Plan to track settlement negotiations (4.7); review emails from T. Schmeltz on SAFE AHG plan proposal and reaction (.1); conference call with Special Committee, D. Dunn, M. Robinson, T. Schmeltz on plan negotiations and response to SAFE AHG (.5); email C. Underwood on Special Committee resolution regarding Plan (.1); revise resolution and email C. Underwood further on same (.2); further emails to C. Underwood on resolution (.1); review and revise language on substantial contribution claim (.2); review Special Committee emails on same (.2); draft Plan language regarding substantial contribution claim (.3); email to Special Committee on same (.1); review A. Wissel research on recoverability of attorneys' fees under TX law (.1).	6.60	7,953.00
09/16/25	Trace (Vincent P.) Schmeltz	Calls with D. Eaton (.1), C. Underwood (.1), M. Robinson (.8), D. Eaton and M. Robinson (.8), all on potential settlement and development of plan on same; conference call with client team regarding plan negotiations and response to SAFE AHG (.5); follow up regarding same (.4); confer with S. Schultz and M. Hurley on potential settlement (.3); e-mail exchange with	4.70	4,700.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		M. Hurley on same (.3); call with P. Tomasco on same (.2); address e-mails regarding PSA (1.2).		
09/16/25	Charlotte Underwood	Draft special committee resolution (.6); call with T. Schmeltz on settlement structures (.1); communications with team regarding ongoing work streams (.4).	1.10	1,177.00
09/16/25	Anna Bninski	Correspond with investigation team regarding filings due this week.	0.10	50.50
09/16/25	Abigail Wissel	Research Texas case law on recoverability of attorneys' fees.	0.80	336.00
09/16/25	Kathleen L. Matsoukas	Draft reply brief in further support of motion for hearing on LKC claims.	1.00	880.00
09/17/25	Paige Lohse	Confer with T. Schmetlz, K. Matsoukas and C. Underwood regarding briefing and fee negotiations (.5); analyze and send correspondence and filings regarding recent developments (.1).	0.60	432.00
09/17/25	Kathleen L. Matsoukas	Review motion for extension and response from LKC and documents cited therein (2.3); draft reply brief in further support of emergency motion for extension of time to object to LKC fee application (2.1); strategize with team (T. Schmeltz, C. Underwood, P. Lohse) regarding briefing and fee negotiations, B. Riley discussions and LKC motion (.5).	4.90	4,312.00
09/17/25	Trace (Vincent P.) Schmeltz	Team call with K. Matsoukas, C. Underwood and P. Lohse to prepare for SAFE call (.5); call with SAFE group regarding PSA (.5); term sheet call between debtors and SAFE AHG (.5); confer with C. Underwood regarding open items (.2); strategy call with address B. Riley and LKC (1.0); confer with R. Mates on Imperium issues (.2); confer with M. Robinson and D. Eaton on SAFE negotiations and path forward (.4).	3.30	3,300.00
09/17/25	Anita Peterson	Review recent bankruptcy filings and assist attorneys in executing strategy per request of N. He (.2); communications with investigative team regarding draft Reply Brief in Further Support of Emergency Motion of the Special Committee for an Extension to File a Response to LKC (.2); review communications with C. Topping and P.	0.70	283.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Tomasco regarding draft Reply Brief in Further Support of Emergency Motion of the Special Committee for an Extension to File a Response to LKC (.1); review communications with D. Eaton and S. Wells regarding draft Reply Brief in Further Support of Emergency Motion of the Special Committee for an Extension to File a Response to LKC (.2).		
09/17/25	Charlotte Underwood	Call with T. Schmeltz, K. Matsoukas and P. Lohse regarding SAFE negotiations (.5); confer with T. Schmeltz regarding resolution and other open items (.2).	0.70	749.00
09/17/25	Anna Brinski	Update certificate of service reflecting email service of unredacted filing (.1); correspond with N. He regarding same (.1); coordinate docketing of same (.2).	0.40	202.00
09/17/25	Kenneth Kansa	Call with Special Committee team on PSA/term sheet (.5); Term sheet call between Debtors and SAFE AHG (.5); draft and revise PSA (.7); draft and revise term sheet (.6); email to T. Schmeltz on sub con claim (.1); review C. Topping email on plan (.3); email to T. Schmeltz on same (.1); email to S. Schultz on plan docs preparation (.1); review S. Wells/D. Eaton emails on term sheet discussions with Imperium (.3); review client emails on plan and next steps (.3).	3.50	4,217.50
09/17/25	Ning He	Finalize certificate of service.	0.20	173.00
09/18/25	Trace (Vincent P.) Schmeltz	Prepare for and attend board meeting (1.2); emails with R. Mates (.1), M. Hurley (.1), and client team (.1), all on settlement status; call with M. Robinson on same (.1); review emails regarding PSA (.3); confer with K. Kansa regarding plan support agreement and draft plan (.2).	2.10	2,100.00
09/18/25	Anna Brinski	Review investigation team correspondence relating to imminent filings (.1); correspond with Managing Clerk's Office regarding certificate of service (.1).	0.20	101.00
09/18/25	Kathleen L. Matsoukas	Work with managing clerk's office to prepare for upcoming filing and coordinate motion to seal	3.20	2,816.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.4); communicate with K. Kansa regarding motion for leave to file reply (.3); further draft and revise reply brief in further support of motion for extension of time to object to LKC fee application (1.5); communicate with client regarding draft brief and proposed edits (.2); work on motion to seal, proposed order, and proposed redactions (.8).		
09/18/25	Kenneth Kansa	Email to K. Matsoukas on LKC reply brief (.1); t/c S. Schultz on plan process (.3); t/c D. Dunn on same (.2); office conference with T. Schmeltz on term sheet/PSA (.2); review and respond to D. Eaton email on recovery for SAFEs (.1); revise term sheet (.5); email to T. Schmeltz on same (.1); email to SAFE AHG team and Imperium/Founders on revised version of term sheet (.3); email to SAFE AHG with redline of same (.1); email to A. Popescu on liquidation analysis (.1); review R. Mates' email on term sheet (.1); review and revise plan document (.5).	2.60	3,133.00
09/19/25	Joseph Kipp	Provide stylistic edits for the Special Committee's Reply Brief on Motion for Extension including redact confidential information.	1.40	679.00
09/19/25	Joseph Kipp	Facilitate filing of the Reply Brief on Motion for Extension, Motion to Seal, and Proposed Order at request of P. Lohse.	1.00	485.00
09/19/25	Anita Peterson	Review communications with D. Eaton and S. Wells regarding draft Reply Brief in Further Support of Emergency Motion of the Special Committee for an Extension to File a Response to LKC (.2); review communications with C. Topping regarding draft Reply Brief in Further Support of Emergency Motion of the Special Committee for an Extension to File a Response to LKC (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2); communications with investigative team regarding draft Reply Brief in Further Support of Emergency Motion of the Special Committee for	0.60	243.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		an Extension to File a Response to LKC (.1).		
09/19/25	Kathleen L. Matsoukas	Review proposed edits from client and team on draft reply brief (.6); incorporate edits and revise reply brief (1.8); communicate with T. Schmeltz regarding revisions (.3); communicate with team regarding motion to seal (.4); review and revise motion to seal and proposed order (.3); oversee final edits and filing of reply and motion to seal (.5).	3.90	3,432.00
09/19/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.2); telephone conference with K. Kansa regarding discovery issues (.4); review and comment on reply in support of motion for extension (.5); hearing preparations (2.7).	3.80	2,736.00
09/19/25	Kenneth Kansa	Call with Province and T. Schmeltz on liquidation analysis (.6); t/c M. Robinson on same (.2); t/c P. Lohse on discovery issues (.4); email to S. Schultz on PSA (.1); review term sheet and related materials (.6); review plan documents (1.2); review/revise disclosure statement provisions (.7).	3.80	4,579.00
09/19/25	Anna Bninski	Correspond with P. Lohse regarding Chase Blackmon deposition (.1); prepare filings, including checking redactions and reviewing file-ready versions of proposed order, reply brief on motion for extension, and motion to file under seal (1.7).	1.80	909.00
09/19/25	Trace (Vincent P.) Schmeltz	Confer with Province and K. Kansa regarding PSA.	0.60	600.00
09/19/25	Charlotte Underwood	Review plan term sheet.	0.30	321.00
09/19/25	Ning He	Revise draft motion to seal and order (1.2); analyze motion regarding LKC issue (.8).	2.00	1,730.00
09/20/25	Kenneth Kansa	Review PSA draft from Akin (.5); email to client/T. Schmeltz on same (.1); further email to client on same (.1).	0.70	843.50
09/21/25	Kenneth Kansa	Review and revise PSA draft (.6); forward same to Akin team with covering comments (.1); email same to client/T. Schmeltz with covering comments (.1); review and revise disclosure	3.10	3,735.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		statement provisions (2.3).		
09/21/25	Anna Bninski	Update discovery tracker per request of P. Lohse (.2); organize Chase Blackmon deposition materials (.1).	0.30	151.50
09/22/25	Anita Peterson	Communications with K. Kansa regarding monthly fee statement, hearings (.3); communications with T. Schmeltz regarding hearings (.2); assist attorneys in executing strategy per request of T. Schmeltz (.3); communications with Quinn Emanuel regarding hearings (.2); review as-filed 2025-09-19 (Dkt 1665) Reply Brief in Further Support of Emergency Motion of Special Committee for Extension to File Response to LKC, sealed version of same, sealed Exhibit 1 of same and assist attorneys in executing strategy per request of P. Lohse (.3); review communication with Porter Hedges forwarding courtesy copies of 2025-09-19 (Dkt 1665) Reply Brief in Further Support of Emergency Motion of Special Committee for Extension to File Response to LKC including sealed version (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	1.60	648.00
09/22/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.3); hearing preparations including deposition review (2.1).	2.40	1,728.00
09/22/25	Lydia Parks	Synthesize and email to C. Underwood analysis related to potential third-party claim.	0.30	145.50
09/22/25	Anna Bninski	Update deposition tracker per request of P. Lohse.	0.20	101.00
09/22/25	Trace (Vincent P.) Schmeltz	Call with Akin Gump and K. Kansa regarding term sheet and PSA (.3); work on PSA (1.4); call with S. Schultz (.3).	2.00	2,000.00
09/22/25	Charlotte Underwood	Analyze third-party bankruptcy claim (.7); confer with Province regarding stakeholder recovery potential (.1); communications with team regarding ongoing work streams (.2).	1.00	1,070.00
09/22/25	Kenneth Kansa	Email to A. Peterson on fee application (.1); call with T. Schmeltz, S. Schultz, M. Hurley on term	7.00	8,435.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		sheet and PSA (.3); conference with A. Wissel on research question (.2); emails to T. Schmeltz on PSA/term sheet (.2); review fee application materials (in part) (.6); review A. Popescu email on liquidation analysis (.1); review and revise settlement provisions of plan document (5.5).		
09/23/25	Joseph Kipp	Retrieve LKC's as-filed sealed response to the SAFE AHG's motion to extend time per request of P. Lohse (.4); communication with C. Topping for review (.2).	0.60	291.00
09/23/25	Joseph Kipp	Draft Certificate of Service for the Reply Brief served on opposing counsel on 9/22 and coordinate filing of same.	0.60	291.00
09/23/25	Anita Peterson	Review communications with C. Topping regarding recent pleadings (.2); review communications with Porter Hedges and Court regarding recent filings (.2); review communications from C. Potter regarding requested status conference (.2); review incoming 2025-09-22 (Dkt 1668) LKC's Redacted Response to SAFE's Joinder in Motion for Extension, 2025-09-22 (Dkt 1670) LKC's Motion for Entry of an Order Sealing Response to SAFE's Joinder to Emergency Motion, 2025-09-22 (Dkt 1671) Order granting LKC's Motion to Seal Reply and assist attorneys in executing strategy per request of P. Lohse (.3); precise tracking and timely updates of deadlines and filings (.1); review as-filed 2025-09-22 (Dkt 1669) Sealed LKC LLP's Response to SAFEs, 2025-09-23 (Dkt 1697) Certificate of Service for ECF 1665 Unredacted Reply Brief (.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 updates relating to Midas Green and LKC following hearing (.2); review incoming 2025-09-23 (Dkt 1694) Order Authorizing Sealing of Response and Authorizing Filing of Redacted Version of Response (re ECF No. 1589) and assist attorneys in executing strategy per request of P.	2.00	810.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Lohse (.2).		
09/23/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.8); hearing preparations (1.2); attend hearings (4.4); follow up from hearings (.9).	7.30	5,256.00
09/23/25	Trace (Vincent P.) Schmeltz	Provide update to client (.6); review liquidation analysis (.7); confer with K. Kansa regarding PSA and plan (.3); confer with Akin regarding PSA (1.0); prepare for and attend court hearing on status (1.0); confer with M. Hurley (.2).	3.80	3,800.00
09/23/25	Anna Bninski	Correspond with N. He, J. Kipp regarding certificate of email service and follow up regarding same.	0.20	101.00
09/23/25	Charlotte Underwood	Review plan related correspondence and changes (.2); review correspondence related to adversary proceeding (.1).	0.30	321.00
09/23/25	Kenneth Kansa	Status call with Special Committee, Province, and T. Schmeltz (.7); participate in liquidation analysis call with Province and T. Schmeltz (.8); call with D. Eaton on plan revisions (.1); office conference with T. Schmeltz on plan discussion with Akin (.3); email to S. Schultz on same (.1); review and revise PSA and term sheet (.7); email to M. Hurley and S. Schultz on same (.1); further revisions to term sheet (.4); email to Special Committee on same (.1); review D. Eaton email on PSA draft (.1); review A. Popescu email on liquidation analysis (.1); review and revise plan draft to track term sheet and additional updates (4.1).	7.60	9,158.00
09/23/25	Abigail Wissel	Conference with K. Kansa regarding research question (.2); review relevant Fifth Circuit court decisions on the permissible scope of an exculpation clause in a Chapter 11 bankruptcy plan (3.1).	3.30	1,386.00
09/23/25	Kathleen L. Matsoukas	Review documents for client.	0.20	176.00
09/23/25	Trace (Vincent P.) Schmeltz	Status call with Special Committee, Province, and K. Kansa.	0.70	700.00
09/23/25	Trace (Vincent P.) Schmeltz	Liquidation analysis call with Province and K. Kansa.	0.80	800.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
09/24/25	Joseph Kipp	Review Special Committee and LKC briefings to identify privileged information requiring redaction.	5.10	2,473.50
09/24/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (2.4); attend hearings (2.9); follow up from hearing (.9); communications regarding fee objection (.5).	6.70	4,824.00
09/24/25	Aaron Gavant	Review and consider impact of recent Midas Green and LKC filings.	0.40	362.00
09/24/25	Anita Peterson	Communications with investigative team regarding updates relating to Midas Green and LKC following additional hearing (.2); review as-filed 2025-09-23 (Dkt 1695) Order Granting Midas Green's Motion for Leave to Amend Original Proof of Claims and assist attorneys in executing strategy per request of P. Lohse (.2); review communications with Akin forwarding LKC filings (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.70	283.50
09/24/25	Kenneth Kansa	Email to D. Eaton on term sheet revisions (.1); email to S. Schultz on same (.1); revise term sheet (.6); email same to S. Schultz and M. Hurley with covering comments (.1); review exculpation research from A. Wissel (.4); email to A. Wissel on same (.1); office conference with T. Schmeltz on plan term sheet and PSA and finalization of same (.2); draft and revise liquidating plan (5.6); review Akin revisions to term sheet (.2); email to K. Zaharis on same (.1); email to client on same (.1); email to S. Schultz on outreach to Imperium on same (.1); communications with T. Schmeltz on same (.2); review Akin revisions to PSA (.3); communications to/from T. Schmeltz on same (.2); email to client on same (.1); review emails on SAFEs' allocation for principal and interest (.1); communication with T. Schmeltz on same (.1); review emails on liquidation analysis (.2).	8.90	10,724.50
09/24/25	Trace (Vincent P.) Schmeltz	Participate in tax analysis call (.6); conference with client regarding next steps (.2); office	2.30	2,300.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		conference with K. Kansa on plan term sheet and PSA (.2); work on settlement provisions of plan (.3); confer with Akin on plan settlements (1.0).		
09/24/25	Anna Bninski	Review investigation team correspondence relating to Objection to LKC's Fee Application.	0.10	50.50
09/24/25	Charlotte Underwood	Confer with client and Province regarding plan updates (.6); review and provide input in SAFE and LKC filings (.7); review notes from Midas Green hearing (.2).	1.50	1,605.00
09/24/25	Abigail Wissel	Research Fifth Circuit case law on the permissible scope of an exculpation clause in a Chapter 11 bankruptcy plan.	2.40	1,008.00
09/24/25	Abigail Wissel	Draft summary of Fifth Circuit case law regarding exculpation clause.	0.60	252.00
09/24/25	Kathleen L. Matsoukas	Prepare for and participate in discussion with counsel for the SAFE AHG regarding LKC fee application and other outstanding discussion points (1.3); review documents relevant to LKC fee application and potential reduction of hourly rates claimed (1.1).	2.40	2,112.00
09/25/25	Joseph Kipp	Redact privileged material contained in LKC briefings.	0.60	291.00
09/25/25	Anita Peterson	Communications with billing clerk (K. Phillips) regarding monthly fee statement (.2); communication with K. Kansa regarding monthly fee statement (.1); review communications regarding Whinstone tax allocations and assist attorneys in executing strategy per request of C. Underwood (.3); review multiple communications with Akin regarding LKC filings and assist attorneys in executing strategy per request of T. Schmeltz (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	1.00	405.00
09/25/25	Trace (Vincent P.) Schmeltz	Participate in tax/valuation call (1.0); conference with M. Robinson regarding PSA and term sheet (.2); conference with M. Hurley on PSA and term sheet (.2); consider strategy in tax	3.50	3,500.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		allocation (.2); telephone call with K. Kansa regarding Imperium claims (.1); work on term sheet (.3); address changes to PSA (.3); discuss objection to LKC with K. Matsoukas (.8); confer with M. Pacey at K&E (.2); conference with C. Underwood regarding strategy (.2).		
09/25/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments.	0.70	504.00
09/25/25	Aaron Gavant	Communications with BT team regarding status and next steps.	0.30	271.50
09/25/25	Charlotte Underwood	Participate in valuation call with T. Schmeltz and others (1.0); participate in call with claimant regarding bankruptcy claim (.2) conference with T. Schmeltz regarding strategy on third-party claim (.2); collect information for and correspond regarding tax allocation (.2).	1.60	1,712.00
09/25/25	Kenneth Kansa	T/c T. Schmeltz on Imperium claims (.1); email to T. Schmeltz on same (.1); review and revise PSA and term sheet based on overnight comments (.5); emails to Akin team on same (.2); revise Plan document (.8); email to D. Eaton on plan draft and release provisions (.3); email to M. Hurley addressing comments on PSA and term sheet (.2); email to S. Schultz on revision to definition in Plan document (.1); email to R. Mates and K. Lee on revised drafts and term sheet (.3); further revise plan materials (.9); review and revise fee application materials (.8); email A. Peterson on same (.1).	4.40	5,302.00
09/25/25	Abigail Wissel	Draft summary of Fifth Circuit case law on the permissible scope of exculpation clauses and gatekeeper clauses in Chapter 11 bankruptcy plans.	0.70	294.00
09/25/25	Kathleen L. Matsoukas	Discuss strategy and arguments for objection to LKC fee application with T. Schmeltz (.8); communicate with P. Lohse regarding same (.1); commence outlining objection to fee application (1.5).	2.40	2,112.00
09/26/25	Charlotte Underwood	Telephone conference with K. Kansa regarding plan.	0.20	214.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
09/26/25	Anita Peterson	Communication with K. Kansa regarding monthly fee statement (.1); review and revise monthly fee statement (3.6); communications with timekeepers regarding monthly fee statement (.2); communications with billing clerk (K. Phillips) regarding monthly fee statement (.3); communication with Quinn Emanuel to coordinate filing of monthly fee statement (.1).	4.30	1,741.50
09/26/25	Leah O'Farrell	Call with K. Kansa regarding solicitation procedures.	0.30	199.50
09/26/25	Kenneth Kansa	T/c M. Robinson on plan preparation (.2); review S. Schultz email on same (.1); email to T. Schmeltz regarding plan status (.1); t/c to S. Schultz on plan and related documents (.4); t/c M. Robinson on update regarding same (.2); t/c with L. O'Farrell on solicitation procedures (.3); t/c C. Underwood regarding plan process (.2); review and revise Rhodium plan document (1.6); email same to S. Schultz with covering comments (.2).	3.30	3,976.50
09/26/25	Kathleen L. Matsoukas	Review LKC fee application and related documents in connection with drafting objection (3.1); review Intellogic case and follow up regarding analysis (.4); draft arguments for objection (1.2).	4.70	4,136.00
09/26/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.6); begin preparation for LKC hearing (.8).	1.40	1,008.00
09/27/25	Anita Peterson	Precise tracking and timely updates of deadlines and filings (.1); review communications with Akin regarding term sheet, PSA and assist attorneys in executing strategy per request of T. Schmeltz (.2).	0.30	121.50
09/27/25	Charlotte Underwood	Review draft Plan.	0.20	214.00
09/27/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments.	0.10	72.00
09/28/25	Charlotte Underwood	Review and provide comments to settlement provisions of draft Plan.	2.20	2,354.00
09/28/25	Kathleen L. Matsoukas	Review fee application, motion to quash discovery, motion to extend time, and other	4.80	4,224.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		documents in connection with drafting objection to LKC fee application (1.1); draft objection to LKC fee application and communicate with team regarding same (3.7).		
09/28/25	Kenneth Kansa	Review and comment on PSA and term sheet revisions from Akin (.7); emails to T. Schmeltz on same (.2); review and revise Plan materials (.6); review M. Hurley email on plan (.1); review Imperium parties' comments on term sheet and PSA (.2).	1.80	2,169.00
09/29/25	Joseph Kipp	Analyze Fifth Circuit case law discussing fee applications.	3.10	1,503.50
09/29/25	Charlotte Underwood	Review and summarize comments on plan for K. Kansa (.7); call with Akin team, T. Schmeltz, K. Kansa, P. Lohse on LKC dispute and plan status (.5).	1.20	1,284.00
09/29/25	Anita Peterson	Communications with billing clerk (K. Phillips) regarding monthly fee statement and Ledes data (.4); communications with T. Schmeltz regarding monthly fee statement (.2); finalize Barnes & Thornburg LLP's Twelfth Monthly Fee Statement for the Period August 1, 2025 Through August 31, 2025 with Exhibits A-C (1.0); precise tracking and timely updates of deadlines and filings (.1); review communications with Akin regarding term sheet, PSA and assist attorneys in executing strategy per request of T. Schmeltz (.2); communications with Quinn Emanuel regarding Barnes & Thornburg LLP's Twelfth Monthly Fee Statement (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	2.30	931.50
09/29/25	Leah O'Farrell	Teleconference with K. Kansa regarding solicitation procedures.	0.20	133.00
09/29/25	Leah O'Farrell	Commence drafting emergency motion for conditional approval and solicitation approval motion.	1.10	731.50
09/29/25	Aaron Gavant	Review term sheet drafts relating to proposed plan with SAFEs.	0.40	362.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
09/29/25	Kathleen L. Matsoukas	Continue reviewing materials and drafting objection to LKC fee application (4.7); prepare for and participate in discussion with SAFE AHG counsel regarding numbers in fee application (.5); participate in discussion with E. Brannon regarding questions about mediation and Whinstone settlement (.5); prepare for and participate in discussion with C. Wheeler, T. Schmeltz, and P. Lohse regarding LKC fee application (.8).	6.50	5,720.00
09/29/25	Carrie M. Raver	Address insurance coverage issues.	0.20	190.00
09/29/25	Anna Bninski	Draft brief section regarding breach of fiduciary duty at request of K. Matsoukas, including additional topical research (2.7); correspond with K. Matsoukas regarding same (.1).	2.80	1,414.00
09/29/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.2); continue preparation for LKC hearing (1.7); call with Akin team, T. Schmeltz, K. Kansa, C. Underwood on LKC dispute and plan status (.5); call with C. Wheeler, T. Schmeltz, K. Matsoukas regarding LKC fee application (.8); review objection to LKC fee objection and supporting documents (3.0).	6.20	4,464.00
09/29/25	Kenneth Kansa	Teleconference with L. O'Farrell regarding solicitation procedures (.4); teleconference with M. Robinson on disclosure statement (.2); call with Akin team, T. Schmeltz, C. Underwood, P. Lohse on LKC dispute and plan status (.5); review PSA and TS materials and email to BT team on same (.3); review emails on term sheet and plan status (.6); email to T. Schmeltz on liquidation analysis (.1); email to M. Robinson and D. Dunn on plan (.1); email to S. Schultz regarding liquidation analysis (.1); email to C. Underwood on plan issues (.1); review C. Underwood email on plan (.1).	2.50	3,012.50
09/29/25	Trace (Vincent P.) Schmeltz	Call with C Wheeler, K. Matsoukas and P. Lohse regarding LKC fee application.	0.80	800.00
09/29/25	Trace (Vincent P.) Schmeltz	Call with Akin team, K. Kansa, C. Underwood, P. Lohse on LKC dispute and plan status.	0.50	500.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
09/30/25	Charlotte Underwood	Participate in call with Riveron regarding allocation (.5); review plan (.2).	0.70	749.00
09/30/25	Joseph Kipp	Research regarding what can constitute a waiver of privilege and share findings with K. Matsoukas.	0.30	145.50
09/30/25	Charlotte Underwood	Revise D&O insurance term sheet (.8); confer with T. Schmeltz regarding the same (.5).	1.30	1,391.00
09/30/25	Anna Bninski	Research privilege issue at request of K. Matsoukas (.7); provide citations for K. Matsoukas to assist with her motion drafting (.2).	0.90	454.50
09/30/25	Joseph Kipp	Research federal and TX case law applying the attorney-client privilege and work product doctrine to fee disputes.	3.80	1,843.00
09/30/25	Anita Peterson	Review as-filed 2025-09-30 (Dkt 1727) B&T's Twelfth Monthly Fee Statement with Exhibits A-C (.2); emails with fee notice parties regarding 2025-09-30 (Dkt 1727) B&T's Twelfth Monthly Fee Statement with Exhibits A-C (.2); review communication with United States Trustee regarding 2025-09-30 (Dkt 1727) B&T's Twelfth Monthly Fee Statement with Exhibits A-C and Ledes data (.2); review incoming communication from C. Potter forwarding courtesy copy of 2025-09-30 (Dkt 29) Notice of Status Conference (2025-10-02) and assist attorneys in executing strategy per request of C. Underwood (.2); precise tracking and timely updates of deadlines and filings (.3); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4).	1.50	607.50
09/30/25	Kathleen L. Matsoukas	Continue drafting objection to LKC fee application (4.8); communicate with T. Schmeltz regarding same (.5); communicate with P. Lohse and J. Kipp regarding objection and accompanying documents (.8); communicate with client regarding draft objection (.4).	6.50	5,720.00
09/30/25	Carrie M. Raver	Address insurance coverage issues.	0.30	285.00
09/30/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.1); facilitate	6.70	4,824.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		with objection to LKC fee objection and supporting motions and documents (6.6).		
09/30/25	Kenneth Kansa	Email to R. Mates and R.J. Shannon on TS/PSA (.1); teleconference with T. Schmeltz on PSA (.1); teleconference with S. Schultz on Plan (.2); review C. Underwood email on D&O term sheet (.1).	0.50	602.50
09/30/25	Trace (Vincent P.) Schmeltz	Confer with C. Underwood regarding D&O insurance.	0.50	500.00
09/30/25	Trace (Vincent P.) Schmeltz	Teleconference with K. Kansa regarding PSA.	0.10	100.00
Fees for Services			\$	460,615.00

	Hours	Rate	Amount
Carrie M. Raver	4.30	\$950.00	\$4,085.00
Aaron Gavant	5.10	\$905.00	\$4,615.50
Kathleen L. Matsoukas	48.20	\$880.00	\$42,416.00
Ning He	23.40	\$865.00	\$20,241.00
Paige Lohse	92.20	\$720.00	\$66,384.00
Leah O'Farrell	5.80	\$665.00	\$3,857.00
Anna Brinski	51.70	\$505.00	\$26,108.50
Joseph Kipp	39.50	\$485.00	\$19,157.50
Kathleen Mangan	10.10	\$485.00	\$4,898.50
Lydia Parks	9.40	\$485.00	\$4,559.00
Kevin Warren	5.00	\$485.00	\$2,425.00
Abigail Wissel	7.80	\$420.00	\$3,276.00
Anita Peterson	38.90	\$405.00	\$15,754.50
Kenneth Kansa	95.50	\$1,205.00	\$115,077.50
Charlotte Underwood	22.90	\$1,070.00	\$24,503.00
Randal J. Kaltenmark	1.90	\$1,030.00	\$1,957.00

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DIRECTORS OF RHODIUM

FIDUCIARY DUTY INVESTIGATION

	Hours	Rate	Amount
Trace (Vincent P.) Schmeltz	101.30	\$1,000.00	\$101,300.00
TOTALS	563.00		\$460,615.00

Other Charges:

08/31/25 168-Pacer Court Filing System Charges 08/01/2025 - 08/31/2025		12.00	
08/31/25 168-Pacer Court Filing System Charges 08/01/2025 - 08/31/2025		7.60	
09/05/25 Westlaw - Computerized Legal Research		404.93	
09/09/25 Westlaw - Computerized Legal Research		269.95	
09/12/25 Westlaw - Computerized Legal Research		1,754.69	
09/18/25 E-Filing Court Documents - E-Filing documents with Court 09-18-2025		50.00	
09/29/25 Westlaw - Computerized Legal Research		2,429.57	
09/30/25 Westlaw - Computerized Legal Research		5,938.94	
09/30/25 Everlaw Inc - Professional Services; Active Review - eDiscovery Hosting Services Subscription Fees 09-30-2025		1,876.00	
09/30/25 Everlaw Inc - Professional Services; Early Case Assessment - eDiscovery Hosting Services Subscription Fees 09-30-2025		1,072.00	
			\$ 13,815.68

BARNES & THORNBURG LLP

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

Invoice 3488576

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

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

PAYABLE UPON RECEIPT

Fees for Services	\$	460,615.00
Other Charges	\$	13,815.68
Total This Invoice	\$	474,430.68

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.

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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.

October 2025

Time Records and Expenses

BARNES & THORNBURG LLP

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

Invoice 3499556

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

November 19, 2025
Trace (Vincent P.) Schmeltz
00101065-00000001

PAYABLE UPON RECEIPT

Fees for Services	\$ 1,240,444.00
Other Charges	\$ 79,453.46
Total This Invoice	\$ 1,319,897.46

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

Invoice 3499556

Page 2

November 19, 2025
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 October 31, 2025 as described on the attached detail.

Fees for Services	\$	1,240,444.00
Other Charges	\$	<u>79,453.46</u>
Total This Invoice	\$	1,319,897.46

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

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FIDUCIARY DUTY INVESTIGATION

Summary of Invoice

Date	Name	Description	Hours	Amount
10/01/25	Anita Peterson	Review incoming communications from Company relating to valuations and assist attorneys in executing strategy per request of C. Underwood (.2); communications with L. Parks regarding fourth interim fee application (.2); assist attorneys in executing strategy per request of K. Matsoukas focusing on Special Committee's objection to LKC fee application with declarations (.2).	0.60	222.00
10/01/25	Charlotte Underwood	Communication with T. Schmeltz regarding term sheet (.1); communications with C. Raver regarding term sheet (.2); revisions to D&O term sheet (.3); correspond with R. Mates regarding the same (.1).	0.70	665.00
10/01/25	Kathleen L. Matsoukas	Continue drafting and revising motion (4.6); draft motion to seal and communicate with team regarding necessity of same (1.2); communicate with T. Schmeltz and client regarding objection and declarations and edits to same (2.4); confer with P. Lohse and T. Schmeltz regarding privilege motion (.6).	8.80	6,864.00
10/01/25	Anita Peterson	Review as-filed 2025-10-01 (Dkt 1732) Special Committee's Objection to LKC's Second and Final Application (with Declarations), 2025-10-01 (Dkt 1733) Emergency Motion of Special Committee to Strike Privileged Information from LKC's Second and Final Application and assist attorneys in executing strategy per request of P. Lohse (.2), detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.40	148.00
10/01/25	Joseph Kipp	Update Special Committee's Emergency Motion and Objection to conform to C. Topping Declaration.	0.70	301.00
10/01/25	Joseph Kipp	Review and revise Emergency Motion.	0.30	129.00
10/01/25	Joseph Kipp	Transmit Objection to LKC's Fee Application, C. Topping Declaration, C. Wheeler Declaration, Emergency Motion to Strike, and Proposed Order to Clerk and coordinate filing of same.	0.70	301.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/01/25	Joseph Kipp	Further review and revise the Special Committee's Emergency Motion to Strike and Objection to LKC's Fee Application.	0.60	258.00
10/01/25	Kenneth Kansa	Communication with A. Wissel on DS question (.1); t/cs with C. Raver on D&O settlement (.2); t/cs with P. Lohse on LKC objection and revisions to same (.3); participate in call with carriers, C. Raver, and T. Schmeltz on D&O insurance settlement (.5); email to C. Underwood regarding Plan revisions (.1); review and revise D&O settlement term sheet (.2); email R. Mates regarding PSA and term sheet (.1); review and revise disclosure statement provisions (4.9).	6.40	6,848.00
10/01/25	Joseph Kipp	Research TX and federal case law for cases involving fee disputes initiated by attorneys in which the Court discusses attorney-client privilege and the work-product doctrine.	1.50	645.00
10/01/25	Joseph Kipp	Research bankruptcy case law involving fee disputes.	1.60	688.00
10/01/25	Joseph Kipp	Review and revise C. Topping Declaration.	3.00	1,290.00
10/01/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.4); call with K. Kansa regarding LKC objection (.3); prepare objection to LKC fee objection and supporting documents (9.0); confer with T. Schmeltz and K. Matsoukas on claim objection (.6).	10.30	6,592.00
10/01/25	Lydia Parks	Determine next fee application deadline and request fee statements.	0.10	43.00
10/01/25	Trace (Vincent P.) Schmeltz	Work on objection to LKC fee application (.7); confer with Paige Lohse and Katie Matsoukas on claim objection (.6); D&O Settlement call with carriers, K. Kansa and C. Raver (.5); C. Wheeler declaration call (.7); attend Rhodium Board Meeting (.8).	3.30	3,300.00
10/01/25	Carrie M. Raver	Telephone conference with K. Kansa on D&O settlement (.2); call with carriers, T. Schmeltz and K. Kansa on D&O insurance settlement (.5).	0.70	591.50
10/02/25	Anita Peterson	Communications with investigative team following status conference and assist attorneys	2.00	740.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		in executing strategy per request of P. Lohse (.3); precise tracking and timely updates of deadlines and filings (.4); review communication with C. Potter following status conference (.1); review communications with Company regarding invoice for September fees (.2); review communications with Akin following status conference (.1); review communications with B. Funk following status conference (.1); review as-filed pleadings in Transcend case including 2025-10-02 (Dkt 1740) Special Committee's Brief in Support of Defendant's Motion to Transfer Venue and in Opposition to Plaintiff's Motion to Remand, 2025-10-02 (Dkt 1740-01) Declaration of Trace Schmeltz, 2025-10-02 (Dkt 1740-02) Exhibit A) and assist attorneys in executing strategy per request of P. Lohse (.4); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4).		
10/02/25	Aaron Gavant	Review developments on plan negotiations.	0.20	161.00
10/02/25	Leah O'Farrell	Continue drafting solicitation motion.	1.50	885.00
10/02/25	Leah O'Farrell	Call with K. Kansa regarding solicitation materials (.2); continue drafting solicitation motion and supporting materials (2.4).	2.60	1,534.00
10/02/25	Leah O'Farrell	Revise solicitation materials per comments from K. Kansa.	0.90	531.00
10/02/25	Leah O'Farrell	Draft non-voting notice and opt-out ballot.	0.80	472.00
10/02/25	Leah O'Farrell	Review of K. Kansa's comments on motion to approve solicitation procedures (.2); edit per comments and research answers to questions presented (.4).	0.60	354.00
10/02/25	Leah O'Farrell	Attention to edits to solicitation order and opt-out notice (.1); review K. Kansa's answer to question on executory contracts in plan (.1).	0.20	118.00
10/02/25	Leah O'Farrell	Attention to final revisions by K. Kansa on motion to approve solicitation procedures (.2); email to K. Kansa with zip file of solicitation materials (.1).	0.30	177.00
10/02/25	Kenneth Kansa	Office conference with M. Bonnici on Disclosure	11.60	12,412.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Statement review (.2); t/c T. Schmeltz on status conference and plan schedule (.2); emails to T. Schmeltz on same (.2); emails to L. O'Farrell on solicitation procedures (.3); participate in team call on plan/DS/solicitation process (.5); email to A. Popescu on general unsecured claims (.1); further emails to T. Schmeltz on confirmation timing and document revisions (.2); emails to/from S. Schultz on same (.1); review and revise disclosure statement (3.5); email BT team on liquidation analysis (.1); email client on disclosure statement (.2); outline solicitation timeline and email BT team on same (.2); review and revise solicitation materials (4.5); emails to/from L. O'Farrell on same (.5); email to C. Underwood on disclosure statement review (.1); review R. Mates email on PSA and Term Sheet (.1); t/cs with P. Lohse on disclosure statement revisions and LKC objection (.2); t/cs to L. O'Farrell on solicitation materials (.2); email to SAFE AHG on disclosure statement and solicitation materials (.2).		
10/02/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.3); attend status conference (.7); call with K. Kansa regarding disclosure statement revisions and LKC objection (.2); follow up from status conference (3.2); continue preparations for upcoming evidentiary hearings (2.5).	6.90	4,416.00
10/02/25	Carrie M. Raver	Draft notice letters to Allied World and XL regarding derivative investigation cost demands/claims.	0.60	507.00
10/02/25	Melissa Bonnici	Office conference with K. Kansa regarding Disclosure Statement review (.2); research documents in case docket and summarized documents, rulings, and events in case timeline for the purposes of assisting K. Kansa with drafting the Disclosure Statement (6.2).	6.40	2,752.00
10/02/25	Anna Bninski	Review investigation team correspondence relating to state court filings as well as plan filing (.1); correspond with C. Underwood regarding to do list (.1).	0.20	90.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/02/25	Charlotte Underwood	Communications with team regarding plan preparations (.5); organization and management of plan and other litigation related discovery (.5); review draft disclosure statement (.4); revise carrier supplemental notices (.2); review legal research relating to privilege (.6).	2.20	2,090.00
10/02/25	Trace (Vincent P.) Schmeltz	Confer with Akin Gump in advance of hearing (.4); confer with clients in advance of hearing (.4); prepare for status conference (.3); call with K. Kansa regarding same (.2); attend status conference with Court (.7); confer with M. Robinson and A. Popescu (.6).	2.60	2,600.00
10/02/25	Kathleen L. Matsoukas	Review communications from C. Topping regarding fee dispute and related evidence (.8); review and comment on work plan (.4).	1.20	936.00
10/02/25	Ning He	Confer with team regarding LKC matter and plan issues.	0.50	385.00
10/03/25	Joseph Kipp	Compile LKC and Special Committee briefings into centralized chart and provide descriptions of each for P. Lohse's review.	3.60	1,548.00
10/03/25	Paige Lohse	Analyze and send correspondence and filings regarding recent developments (.3); continue preparations for upcoming evidentiary hearings (3.2); call with H. Casper regarding matter background and strategy (1.0); LKC discovery (2.6).	7.10	4,544.00
10/03/25	Anita Peterson	Assist attorneys in executing strategy per request of C. Underwood focusing on work plan (.5); review incoming LKC discovery requests to Debtors and assist attorneys in executing strategy per request of P. Lohse (.2); precise tracking and timely updates of deadlines and filings (.5); assist attorneys in executing strategy per request of P. Lohse focusing on pleadings from Transcend bankruptcy matter Case No. 25-03413 (1.8); update pleadings index relating for Transcend bankruptcy matter Case No. 25-03413 at request of P. Lohse (.5); communications with billing clerk (K. Phillips) regarding monthly fee statement (.2); review and revise monthly fee statement (.8); communications with T. Schmeltz regarding	5.90	2,183.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		insurance coverage and follow up regarding same (.2); review communications with insurers and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communication with C. Potter requesting draft plan (.1); review communications with B. Funk regarding term sheet (.2); review communication with M. Hurley regarding draft plan (.1); communications with investigative team regarding discovery requests and assist attorneys in executing strategy per request of T. Schmeltz (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4).		
10/03/25	Kevin Warren	Conduct legal research for C. Underwood.	3.10	1,333.00
10/03/25	Aaron Gavant	Review developments on plan negotiations (.3); communications with BT team regarding same (.2).	0.50	402.50
10/03/25	Carrie M. Raver	Address notice letters to insurers and submission of defense costs and proof of payment.	0.50	422.50
10/03/25	Leah O'Farrell	Attention to emails from C. Underwood regarding work plan and calendaring of plan deadlines.	0.10	59.00
10/03/25	Leah O'Farrell	Prepare calendar of plan deadlines (.1); email to A. Peterson regarding calendaring for BT team same (.1).	0.20	118.00
10/03/25	Kenneth Kansa	Email C. Underwood on disclosure statement revisions (.1); email to SAFEs' counsel regarding redline of disclosure statement (.2); t/c T. Schmeltz on plan revisions (.1); review T. Schmeltz plan revisions (.6); t/c A. Popescu on disclosure statement revisions (.1); review and respond to C. Underwood emails on unsecured claim (.2); email to A. Wissel on timing of plan objections research (.2); review Transcend/A shareholders' emails on plan and disclosure statement (.2); email to litigation team on timing of objections (.1); review and revise Plan draft and email to SAFE AHG/T. Schmeltz/C. Underwood on same (3.3); t/c C. Underwood on	5.40	5,778.00

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

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		plan process and timing (.2); t/c D. Eaton on disclosure statement revisions (.1).		
10/03/25	Leah O'Farrell	Attention to email conversation regarding sharing plan and solicitation materials with interested parties.	0.10	59.00
10/03/25	Haley Casper	Call with P. Lohse regarding matter background and strategy for LKC and Transcend disputes (1.0); begin review of documents in furtherance of same (.2).	1.20	630.00
10/03/25	Charlotte Underwood	Review plan (1.2); review and revise disclosure statement (1.1); review and revise D&O term sheet (.5); draft follow up notices (.6); communications with team regarding planning for upcoming plan confirmation, discovery, and motion practice (1.5); confer with T. Schmeltz (.4) and K. Kansa (.2) on plan related matters.	5.50	5,225.00
10/03/25	Anna Bninski	Correspond with P. Lohse regarding upcoming evidentiary proceedings (.2); review investigation team correspondence regarding discovery requests (.1).	0.30	135.00
10/03/25	Trace (Vincent P.) Schmeltz	Draft Plan (4.9); call with K. Kansa regarding plan revisions (.1); confer with C. Underwood regarding plan related matters (.4).	5.40	5,400.00
10/03/25	Kathleen L. Matsoukas	Review and provide comments on Debtors' omnibus claim objection.	0.90	702.00
10/03/25	Abigail Wissel	Research Fifth Circuit and Southern District of Texas case law regarding the proper timing for objections to liquidation analysis (3.8); summarize same for K. Kansa (.9).	4.70	1,762.50
10/04/25	Paige Lohse	Continue preparations for upcoming evidentiary hearings.	4.70	3,008.00
10/04/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse continuing to focus on pleadings from Transcend bankruptcy matter Case No. 25-03413 (1.1); update pleadings index relating for Transcend bankruptcy matter Case No. 25-03413 at request of P. Lohse (.9).	2.00	740.00
10/04/25	Leah O'Farrell	Revise solicitation order and motion per instructions regarding multiple ballots.	0.50	295.00
10/04/25	Leah O'Farrell	Draft cure notice and publication notice.	1.10	649.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/04/25	Joseph Kipp	Compile LKC and Special Committee briefings into centralized chart and provide descriptions of each for P. Lohse's review.	0.20	86.00
10/04/25	Haley Casper	Communicate with P. Lohse regarding chronology of facts and case preparation (.2); evaluate P. Lohse updates regarding LKC and Transcend disputes and next steps and communicated internally regarding same (.3); analyze April 2025 mediation statement, LKC dispute briefing, and discovery and create chronology of key facts and transactions and simultaneously create list of key people and entities (4.0).	4.50	2,362.50
10/04/25	Kenneth Kansa	Email to S. Schultz on revised plan and disclosure statement (.2); email to S. Schultz on SAFEs' plan voting (.1); email L. O'Farrell on same (.1); review UST objection to prior plan terms and email BT team on same (.5); follow up email to L. O'Farrell on same (.1); review S. Baham revisions to SAFEs' voting materials (.4); email to BT team on same (.1); review and revise solicitation materials (1.2); email to L. O'Farrell on same (.1); review A. Wissel email on injunction question (.1); further review and revision of settlement materials (.8).	3.70	3,959.00
10/04/25	Kathleen L. Matsoukas	Communicate with P. Lohse regarding action items on preparing for LKC hearing.	0.40	312.00
10/04/25	Abigail Wissel	Email to K. Kansa on research regarding gatekeeper provision in Chapter 11 plan.	0.10	37.50
10/05/25	Paige Lohse	Work on LKC discovery.	5.70	3,648.00
10/05/25	Anita Peterson	Communication with L. Parks regarding fourth interim fee statement (.1); review Special Committee's First Set of Requests for Production of Documents to LKC and assist attorneys in executing strategy per request or P. Lohse (.2); precise tracking and timely updates of deadlines and filings (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	0.80	296.00
10/05/25	Leah O'Farrell	Attention to email with revisions to solicitation	0.10	59.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		order and motion from Akin team and follow up email from K. Kansa regarding same.		
10/05/25	Leah O'Farrell	Review revisions to cure notice and publication notice (.2); email drafts regarding same to Akin team (.1).	0.30	177.00
10/05/25	Lydia Parks	Draft the Fourth Interim Fee Application (2.8); draft Certification to accompany the Application (.7).	3.50	1,505.00
10/05/25	Haley Casper	Continue analysis of Barnes and Thornburg April 2025 mediation statement, requests for discovery, and pleadings regarding dispute with LKC including supplement chronology with key facts, disputes, and transactions.	4.80	2,520.00
10/05/25	Kenneth Kansa	Review publication notice and cure notice and revise same (.4); email to L. O'Farrell regarding same (.1); review L. O'Farrell email on rejection notice (.1); further review of disclosure statement and plan materials regarding settlement (1.3); further review of solicitation materials on settlement points (.6).	2.50	2,675.00
10/05/25	Trace (Vincent P.) Schmeltz	Revise plan documents (1.3); call with clients and SAFE AHG on plan documents (.9).	2.20	2,200.00
10/05/25	Kathleen L. Matsoukas	Review and comment on draft document requests to LKC.	0.90	702.00
10/06/25	Joseph Kipp	Gather key facts pertaining to LKC's fee dispute with Special Committee and synthesize into written form to be used in Special Committee's Motion to Enforce Purchase and Sale Agreement.	0.60	258.00
10/06/25	Joseph Kipp	Research Fifth Circuit bankruptcy cases discussing enforcement of Settlement Agreement.	1.20	516.00
10/06/25	Joseph Kipp	Draft and revise Special Committee's Motion to Enforce the Purchase and Sale Agreement.	1.40	602.00
10/06/25	Anita Peterson	Review and revise monthly fee statement (3.8); communications with T. Schmeltz regarding monthly fee statement (.1); precise tracking and timely updates of deadlines and filings (.2); communications with P. Lohse regarding same (.2); communication with L. Parks regarding	6.30	2,331.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		fourth interim fee statement (.1); review multiple communications with Akin, R. Mates regarding PSA and term sheet and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with Quinn Emanuel regarding same, solicitation materials (.2); review communications with Akin, R. Mates regarding solicitation materials and assist attorneys in executing strategy per request of C. Underwood (.2); review additional communications with Akin regarding PSA solicitation materials (.1); review communications with D. Eaton, S. Wells, D. Dunn, M. Robinson, Quinn Emanuel regarding same (.2); review communications with Akin, R. Mates, R.J. Shannon, S. Schultz regarding PSA and term sheet (.3); review communications with Akin regarding draft Joint Chapter 11 Plan of Liquidation (.2); 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 Porter Hedges regarding discovery requests and assist attorneys in executing strategy per request of T. Schmeltz (.2).		
10/06/25	Joseph Kipp	Research bankruptcy cases on fee reimbursement for LKC dispute.	1.20	516.00
10/06/25	Leah O'Farrell	Call with K. Kansa regarding solicitation exhibits.	0.20	118.00
10/06/25	Leah O'Farrell	Review revisions on emergency motion for conditional approval of disclosure statement (.2); compare drafts (.4); further revise motion per review (.5).	1.10	649.00
10/06/25	Leah O'Farrell	Revise order on solicitation motion per edits to motion (.2); review and accept changes from Akin to solicitation exhibit documents (.4); create beneficial and master ballots for classes 10 and 11 (.2).	0.80	472.00
10/06/25	Leah O'Farrell	Call with K. Kansa regarding solicitation materials (.3); draft notice of PSA (.1).	0.40	236.00
10/06/25	Paige Lohse	Preparations for hearing on LKC dispute (6.4);	7.20	4,608.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		call with K. Kansa regarding claims issues (.2); analyze and send correspondence and filings regarding recent developments (.3); confer with T. Schmeltz regarding Temple claims (.1); prepare motion practice against Whinstone (.2).		
10/06/25	Carrie M. Raver	Address insurance coverage issues.	0.20	169.00
10/06/25	Charlotte Underwood	Review and finalize D&O settlement (1.8); review revise and finalize Plan Support Agreement, Plan, and Disclosure Statement (3.8); confer with client and Province regarding plan and other related updates (.6); finalize Special Committee resolution related to plan support agreement (.3); analyze materials related to Kirkland claim (.3); call with K. Kansa regarding plan (.2); communication with T. Schmeltz regarding same (.2).	7.20	6,840.00
10/06/25	Lydia Parks	Revise the Fourth Interim Fee Application.	1.00	430.00
10/06/25	Kenneth Kansa	T/c L. O'Farrell on solicitation materials (.3); communication with A. Wissel on research question (.1); t/c P. Lohse on claims issues (.2); t/c T. Schmeltz on plan questions (.2); t/c C. Underwood on same (.2); t/c L. O'Farrell on solicitation exhibits (.2); conference with S. Schultz on plan/DS/solicitation materials (.5); email to S. Baham on solicitation materials (.1); email to BT team on status of all settlement-related materials (.4); email L. O'Farrell on notice of PSA (.1); email L. O'Farrell on solicitation materials (.1); email A. Popescu regarding plan draft (.1); email to C. Underwood on plan status (.1); email to L. O'Farrell on settlement opt outs (.1); email to C. Underwood on plan revisions (.1); email to T. Schmeltz on disclosure statement (.1); review Akin revisions to disclosure statement (.9); email to client and BT team on same (.1); review Akin comments on Plan (.4); email to client and BT team on same (.1); email to L. O'Farrell on solicitation procedures (.1); email to P. Tomasco and Quinn Emanuel team on plan, disclosure statement, and related materials (.4); review PSA and email to C. Underwood on same (.4); review and revise plan draft regarding settlement (2.0);	10.20	10,914.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		email to client on same (.1); further email to client on same (.1); review and revise disclosure statement regarding settlement (2.2); email to client on same (.1); email to Quinn Emanuel team on same (.1); review final versions of PSA and term sheet (.3).		
10/06/25	Kevin Warren	Review mediation statement, along with pleadings with respect to LKC dispute to prepare to assist P. Lohse in LKC dispute.	2.50	1,075.00
10/06/25	Haley Casper	Evaluate strategy regarding Motion to Enforce PSA from P. Lohse (.2); communicate with P. Lohse and J. Kipp regarding same (.1); collect and send relevant documents to J. Kipp including communications relating to same (.4).	0.70	367.50
10/06/25	Haley Casper	Evaluate question and dispute regarding privilege with respect to Transcend litigation (.2); communicate with P. Lohse and K. Warren regarding same in furtherance of evaluation and strategy (.1).	0.30	157.50
10/06/25	Haley Casper	Finalize review of LKC dispute discovery documents and pleadings and supplement chronology of key transactions and disputes in furtherance of investigation and litigation strategy and simultaneously supplement list of key individuals and entities in furtherance of same.	3.30	1,732.50
10/06/25	Haley Casper	Begin review of Transcend dispute documents and pleadings, create chronology of key transactions and disputes in furtherance of investigation and litigation strategy and simultaneously supplement list of key individuals and entities in furtherance of same.	6.80	3,570.00
10/06/25	Trace (Vincent P.) Schmeltz	Revise plan documents (2.2); call with K. Kansa regarding plan questions (.2); conference call with C. Topping (.4); confer with P. Lohse on Temple claims (.1); confer with Special Committee on plan issues (.5).	3.40	3,400.00
10/06/25	Kathleen L. Matsoukas	Prepare for and lead discussion with M. Robinson regarding Whinstone timeline of events (1.3); communicate with M. Robinson regarding payment of a portion of fees to LKC	1.80	1,404.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.2); review caselaw regarding Court's ability to revise contingency fee award (.3).		
10/06/25	Ning He	Analyze materials regarding production of report and potential privilege.	0.50	385.00
10/07/25	Joseph Kipp	Research bankruptcy cases regarding fee awards for LKC dispute.	1.60	688.00
10/07/25	Joseph Kipp	Review LKC invoices attached to fee application and prepare chart of same.	1.60	688.00
10/07/25	Joseph Kipp	Draft Motion to Enforce Purchase and Sale Agreement between Debtors and Whinstone.	2.10	903.00
10/07/25	Leah O'Farrell	Attention to emails regarding signatures on PSA and filing of PSA (.2); attention to emails regarding open items prior to filing plan (.2); attention to emails regarding edits to plan and disclosure statement (.1).	0.50	295.00
10/07/25	Leah O'Farrell	Attention to emails from Quinn Emanuel team regarding notice agent (.1); draft email to notice agent regarding solicitation timeline (.1).	0.20	118.00
10/07/25	Leah O'Farrell	Finalize solicitation materials.	1.20	708.00
10/07/25	Leah O'Farrell	Attention to emails from Verita and Akin regarding master ballot including set conference with both regarding same.	0.10	59.00
10/07/25	Leah O'Farrell	Call with Verita and Akin regarding ballot issue.	0.50	295.00
10/07/25	Leah O'Farrell	Revise class 10 ballots per comments from Verita and draft standard ballots for all three classes.	0.50	295.00
10/07/25	Leah O'Farrell	Update solicitation exhibits with new release language.	0.40	236.00
10/07/25	Leah O'Farrell	Attention to email from Akin regarding edits to solicitation motion and order (.2); review same and consolidate versions of motion (.3).	0.50	295.00
10/07/25	Leah O'Farrell	Attention to email from K. Kansa regarding Akin updating solicitation motion and allowing SAFEs to vote.	0.10	59.00
10/07/25	Leah O'Farrell	Review Disclosure statement and add additional dates and edits (.3); review edits on plan and disclosure statement from Akin (.2).	0.50	295.00
10/07/25	Leah O'Farrell	Review edits to ballots and conform current	0.70	413.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		ballots to same (.5); update solicitation document chart regarding status and versions (.1); review changes to motion related to e-ballots (.1).		
10/07/25	Leah O'Farrell	Implement Akin's revisions to plan per K. Kansa's instructions (.4); call with C. Underwood and K. Kansa regarding plan and disclosure statement (1.2).	1.60	944.00
10/07/25	Leah O'Farrell	Attention to message from K. Kansa to send solicitation materials including draft email to Quinn Emanuel team regarding solicitation materials.	0.10	59.00
10/07/25	Leah O'Farrell	Attention to email regarding further release language changes (.1); communications with K. Kansa and C. Underwood regarding same (.2); revise solicitation materials regarding same (.3); update plan regarding same (.1).	0.70	413.00
10/07/25	Leah O'Farrell	Attention to final edits on plan and disclosure statement (.2); emails regarding same (.2); implement final revisions and compile documents with exhibits (.4).	0.80	472.00
10/07/25	Leah O'Farrell	Edit revisions to signature pages per request from Akin (.3); edits to final revisions to signature pages per further request from Akin (.2).	0.50	295.00
10/07/25	Anita Peterson	Communications with investigative team regarding PSA and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with R.J. Shannon regarding solicitation materials (.1); review communications with R. Mates, R.J. Shannon regarding draft Joint Chapter 11 Plan of Liquidation, Disclosure Statement (.4); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); review as-filed 2025-10-07 (Dkt 1747) Notice of Filing Plan Support Agreement and assist attorneys in executing strategy per request of C. Underwood (.2); review 2025-10-06 Illustrative Summary of Principal Terms for Settlement of Rhodium D and O Claims (Execution Copy) and	6.30	2,331.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		assist attorneys in executing strategy per request of C. Underwood (.2); review and revise monthly fee statement (4.4); review communications with R. Mates regarding requested footnote relating to Disclosure Statement and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with Quinn Emanuel regarding draft Omnibus Objection documents and assist attorneys in executing strategy per request of C. Underwood (.2).		
10/07/25	Kathleen L. Matsoukas	Prepare for and participate in discussion with J. Wolfshohl regarding potential settlement or progress on settlement with LKC.	0.40	312.00
10/07/25	Kathleen L. Matsoukas	Prepare for and participate in interview of K. Hays in connection with preparation for litigation of fee dispute with LKC (1.2); review research on success fees (.5).	1.70	1,326.00
10/07/25	Charlotte Underwood	Call with SAFE AHG, client, and others related to plan revisions (.6); call with SAFE AHG and Founders regarding plan revisions (.5); confer with client regarding plan-related revisions (.3); review, revise, and finalize plan materials (7.5); conferences with K. Kansa and L. O'Farrell regarding plan and disclosure statement (1.2); draft emails related to LKC matter (.3); correspond with client regarding Kirkland claim (.3).	10.70	10,165.00
10/07/25	Kenneth Kansa	Telephone conference D. Eaton on settlement revisions (.3); call with client/Debtors/SAFE AHG on finalization of settlement terms and next steps (.6); call with Imperium/Founders/SAFE AHG on next steps (.4); numerous telephone conferences with S. Schultz on document finalization (.6); emails to S. Schultz on same (.3); telephone conference with C. Topping on revisions to plan and related documents (.6); numerous conferences with C. Underwood and L. O'Farrell on finalization of plan documents (1.2); conferences with T. Schmeltz on same (.2); conference with client, T. Schmeltz, C. Underwood on final revisions to plan documents (.3); review materials on	14.60	15,622.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		schedule amendments (.5); telephone conferences S. Schultz on same (.3); emails to S. Schultz on same (.2); email to D. Eaton on substantial contribution claim language (.1); morning review of plan and disclosure statement documents on settlement and revise same (1.2); emails to C. Topping on plan revisions (.3); further review and revision to plan provisions on settlement (1.6); circulate same to SAFEs/Imperium/Founders/client team with covering comments (.3); review and revise release language in plan regarding settlement (.2); review solicitation issues for settlement parties (.4); emails to client on settlement terms and incorporation into plan (.4); review and revise disclosure statement provisions on settlement (1.7); emails to S. Schultz on same (.4); emails to BT team on same (.6); email to M. Robinson and A. Popescu on schedule amendments regarding SAFEs (.1); finalize plan and disclosure statement documents for settlement, including numerous communications with C. Underwood and L. O'Farrell (1.8).		
10/07/25	Paige Lohse	Preparations for hearing on LKC dispute (4.6); analyze and send correspondence and filings regarding recent developments (.6).	5.20	3,328.00
10/07/25	Kevin Warren	Draft analysis, with related research, of privilege issues related to the LKC dispute to assist L. Paige, K. Matsoukas, and H. Casper regarding the same.	3.10	1,333.00
10/07/25	Haley Casper	Communicate with C. Underwood regarding status of PSA and signature (.1); continue evaluation of Transcend pleadings and supplement chronology of facts and transactions and list of key individuals and entities (1.2).	1.30	682.50
10/07/25	Haley Casper	Draft definitions, instructions, and begin drafting document requests to Transcend in furtherance of discovery and litigation strategy (2.2); evaluate related document requests to LKC in furtherance of same (2.5).	4.70	2,467.50
10/07/25	Haley Casper	Strategize with P. Lohse regarding call with B.	2.00	1,050.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Riley (.1); analyze K. Warren research and findings regarding privilege implications and waivers in furtherance of same (.2); analyze K. Hays interview outline and prepare for interview (.2); participate in interview of K. Hays (1.2); evaluate LKC document requests and review document requests to K. Hays in furtherance of relevant production (.3).		
10/07/25	Haley Casper	Edit and supplement draft Motion to Enforce the PSA (1.6); communication regarding comments internally (.2).	1.80	945.00
10/07/25	Trace (Vincent P.) Schmeltz	Review and revise plan documents (1.9); call with SAFE AHG and Special Committee (.5); strategy call with P. Tomasco (.2); plan related call with K. Kansa, C. Underwood and Special Committee (.3); call with Chase Blackmon (.2); plan related calls with S. Schultz and M. Hurley (.5).	3.60	3,600.00
10/07/25	Ning He	Analyze data regarding factual investigation (5.2); analyze interview memos (1.2).	6.40	4,928.00
10/07/25	Ning He	Analyze documents regarding proposed plan.	0.50	385.00
10/08/25	Joseph Kipp	Review and evaluate LKC invoices attached to fee application and prepare chart of same.	1.20	516.00
10/08/25	Joseph Kipp	Draft Motion to Enforce Purchase and Sale Agreement between Debtors and Whinstone.	0.30	129.00
10/08/25	Joseph Kipp	Review and analyze Purchase and Sale Agreement between Debtors and Whinstone to ascertain whether claims arising under prior energy contracts are viable.	1.00	430.00
10/08/25	Joseph Kipp	Research TX caselaw discussing elements of bad faith breach of contract and calculation of lost profits.	0.60	258.00
10/08/25	Anita Peterson	Review and revise monthly fee statement (2.4); emails with timekeepers regarding monthly fee statement (.3); communications with billing clerk (K. Phillips) regarding monthly fee statement (.3); communications with K. Kansa regarding monthly fee statement (.1); precise tracking and timely updates of deadlines and filings (.3); review as-filed 2025-10-07 (Dkt 1750) Amended Joint Chapter 11 Plan of Liquidation for	6.50	2,405.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Rhodium Encore LLC and Its Affiliated Debtors Proposed by Debtor and SAFE AG, 2025-10-07 (Dkt 1751) Disclosure Statement for Joint Chapter 11 Plan of Liquidation of Rhodium Encore LLC and its Affiliated Debtors and assist attorneys in executing strategy per request of C. Underwood (.2); review communications with Akin regarding draft Omnibus Objection documents and assist attorneys in executing strategy per request of C. Underwood (.2); review multiple incoming communications from C. Potter regarding proposed discovery (.2); communications with investigation team regarding same (.3); review incoming communications with Akin and C Potter regarding discovery schedule (.2); review incoming communication with P. Tomasco regarding request for deposition dates (.1); review multiple communications with Quinn Emanuel regarding draft Debtors' Second Omnibus Claim Objection and assist attorneys in executing strategy per request of T. Schmeltz (.4); review communications with Company regarding September invoice estimate (.2); review multiple communications from A. Popescu to Akin forwarding draft claim objection materials (.3); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); review incoming communication with Porter Hedges forwarding as-filed pleadings (.1); review as-filed 2025-10-08 (Dkt 1754) LKC's Response to Special Committee's Emergency Motion to Strike, 2025-10-08 (Dkt 1755) [SEALED] LKC Response to Special Committee's Emergency Motion to Strike and assist attorneys in executing strategy per request of P. Lohse (.2); communications with K. Kansa, L. Parks regarding Fourth Interim Fee Statement (.2); review communications with A. Popescu regarding amended schedules (.1).		
10/08/25	Leah O'Farrell	Attention to emails amending schedule (.1); email with K. Kansa regarding same (.1).	0.20	118.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/08/25	Aaron Gavant	Review revised drafts of plan and disclosure statement (.4); communications relating to same (.1).	0.50	402.50
10/08/25	Paige Lohse	Preparations for hearing on LKC dispute (1.8); review third-party claims (2.9); telephone conference with K. Kansa regarding same (.4); preparations for hearing on Transcend dispute (1.6); additional telephone conference with K. Kansa regarding third-party analysis regarding Temple Green (.2).	6.90	4,416.00
10/08/25	Kevin Warren	Assist P. Lohse and K. Matsoukas in interview of C. Topping with respect to LKC dispute.	1.80	774.00
10/08/25	Charlotte Underwood	Attention to plan related discovery (1.0); confer with plan proponents regarding objection (.5); correspond with C. Topping regarding filed plan (.2); attention to second omnibus objection (1.6); confer with T. Schmeltz regarding outstanding items (.3); draft correspondence related to common interest research and review the same (.8).	4.40	4,180.00
10/08/25	Charlotte Underwood	Review and finalize plan.	0.50	475.00
10/08/25	Kenneth Kansa	Review third-party claims analysis regarding Temple Green (.3); email P. Lohse on same (.1); t/c to P. Lohse on same (.4); further review of Temple Green analysis (.8); further t/c to P. Lohse on same (.2); email to C. Underwood on Transcend claims objection (.1); email to C. Topping on plan settlement edits (.1); conference with BT and Akin teams on Transcend claims objection (.5); review Transcend claims objection (.4); email to M. Robinson on liquidation analysis (.1); draft language for P. Lohse on Temple Green and email P. Lohse on same (.2); emails to C. Underwood and L. O'Farrell on schedule amendments (.2); email L. Parks on Fourth Interim Fee Application (.1); review emails on schedule amendments (.4); review emails on plan/DS revisions (.2); review further materials on claims objections (.3).	4.40	4,708.00
10/08/25	Haley Casper	Continue supplementing draft document	2.40	1,260.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		requests to Transcend and circulate internally (1.6); evaluate discovery email from Transcend team and scope of sought discovery (.2); communication with P. Lohse regarding strategy for Transcend discovery and potential impact on privilege (.2); review K. Warren prior initial research regarding privilege and communicate with K. Warren regarding supplementing research (.4).		
10/08/25	Haley Casper	Edit and supplement Motion to Enforce PSA (.6): email with P. Lohse regarding same (.2).	0.80	420.00
10/08/25	Haley Casper	Communicate with team regarding supplementing draft J. Salin investigation outline and strategy (.1); commence initial review in furtherance of same (.2).	0.30	157.50
10/08/25	Haley Casper	Analyze LKC's Response to the Motion to Strike and supplement chronology in furtherance of litigation strategy and factual analysis (.6); analyze documents from K. Hays and supplement chronology in furtherance of same (.5).	1.10	577.50
10/08/25	Charity Seaborn	Review case file, including prior correspondence, pleadings, and key evidence, to gain familiarity with factual and legal issues in preparation for assuming case responsibilities.	3.10	1,488.00
10/08/25	Kathleen L. Matsoukas	Prepare for interview of C. Topping relating to LKC fee dispute (.6); participate in interview of C. Topping (1.0).	1.60	1,248.00
10/08/25	Trace (Vincent P.) Schmeltz	Text exchanges with M. Hurley and R. Mates regarding plan issues (.3); attend Rhodium Board meeting (1.0); conferences with D. Eaton and M. Robinson regarding strategy (.9); confer with C. Topping regarding plan issues (.3); confer with C. Underwood regarding strategy (.3); call with M. Hurley (.1).	2.90	2,900.00
10/09/25	Joseph Kipp	Review CourtLink filings regarding Porter Hedges.	0.10	43.00
10/09/25	Anita Peterson	Communications with K. Kansa, L. Parks and A. Wissel regarding Fourth Interim Fee Statement (.4); follow up regarding same per request of K. Kansa (.6); precise tracking and timely updates	3.10	1,147.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		of deadlines and filings (.2); review multiple communications with Quinn Emanuel regarding draft Debtors' Second Omnibus Claim Objection and assist attorneys in executing strategy per request of T. Schmeltz (.6); review communications with Akin regarding same (.3); review communications with D. Eaton, S. Wells regarding draft Debtors' Second Omnibus Claim Objection (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.6); review communications with Company regarding requested documents (.1); review communications from A. Popescu regarding amended schedules (.1).		
10/09/25	Charity Seaborn	Review and analyze pleadings related to the Special Committee, including Plaintiffs' state court complaint, Defendants' motion to transfer, and Special Committee's motion to intervene.	1.60	768.00
10/09/25	Lydia Parks	Correspond with A. Wissel regarding the upcoming fee application.	0.30	129.00
10/09/25	Leah O'Farrell	Attention to email from S. Bahan at Akin requesting Word versions of filed documents, including compile and send same.	0.10	59.00
10/09/25	Leah O'Farrell	Call with P. Lohse regarding hearings and plan discovery.	0.30	177.00
10/09/25	Joseph Kipp	Research Local Rules for S.D. Texas Bankruptcy Court.	0.90	387.00
10/09/25	Paige Lohse	Preparations for hearing on LKC dispute (1.5); call with L. O'Farrell regarding hearings and plan discovery (.3); preparations for plan confirmation discovery (2.3); third-party claim evaluation (.5); analyze and send correspondence and filings regarding recent developments (.2); revise motion to enforce Purchase and Sale Agreement against Whinstone (1.7).	6.50	4,160.00
10/09/25	Charity Seaborn	Continue to analyze pleadings in preparation of determining discovery needs, including the recorded hearing.	1.20	576.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/09/25	Charlotte Underwood	Confer with Quinn Emanuel regarding objection (.6); review, revise, and confer with team regarding omnibus objection (1.3); call with K. Kansa regarding ancillary settlement/plan documents (.2); attention to amended schedules (.3); confer with client regarding objection (.2); correspond with team regarding LKC fee (.2); manage ongoing plan discovery and other projects (.5); confer with T. Schmeltz regarding various open issues (.4).	3.70	3,515.00
10/09/25	Aaron Gavant	Review plan negotiation communications (.4); communications with BT team regarding same (.1).	0.50	402.50
10/09/25	Haley Casper	Send update to P. Lohse regarding status of tasks and next steps.	0.10	52.50
10/09/25	Anita Peterson	Review communications with Quinn Emanuel regarding Debtors' Second Omnibus Objection (.3); review communication with Akin regarding same (.2); review as-filed 2025-10-09 (Dkt 1764) Debtors' Second Omnibus Objection to Certain Claims (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	1.00	370.00
10/09/25	Kathleen L. Matsoukas	Participate in meet and confer with C. Potter and other counsel on discovery (.5); communicate with team regarding claim objection (.3).	0.80	624.00
10/09/25	Kenneth Kansa	Conference with Akin and Province teams on liquidation analysis (1.0); email to A. Popescu on liquidation analysis call (.1); review footnotes to liquidation analysis and email to A. Popescu on same (.6); review revisions to amended schedules (.4); email to Quinn Emanuel team on same (.1); review T. Schmeltz email on claims objection (.1); communications with T. Schmeltz on same (.3); review additional emails on claims objection (.4); review further emails on schedule amendments and revisions to same (.3); t/c D. Eaton on settlement research (.2); t/c T. Schmeltz on claims objection (.2); t/c C. Underwood regarding preparation of ancillary	4.20	4,494.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		settlement/plan documents (.2); t/c with A. Wissel on preparation of interim fee application (.3).		
10/09/25	Trace (Vincent P.) Schmeltz	Strategy calls with D. Eaton and S. Wells (.6); S. Schultz and M. Hurley (1.1); M. Robinson (.4); K. Kansa (.2); P. Tomasco (.6); C. Underwood (.4); and LKC litigation team (.5). attend formal meeting with Special Committee and Rhodium (.6).	4.40	4,400.00
10/09/25	Abigail Wissel	Email to L. Parks on Fourth Interim Fee Application (.1); call with K. Kansa on same (.3).	0.40	150.00
10/10/25	Joseph Kipp	Research TX caselaw discussing the economic loss doctrine, gross negligence, consequential damages, and the implied warranty of suitability.	3.10	1,333.00
10/10/25	Joseph Kipp	Analyze Temple Green lease and extract key information pertaining to damages waivers and reservations of control.	0.50	215.00
10/10/25	Joseph Kipp	Confer with P. Lohse regarding TX caselaw discussing economic loss doctrine and consequential damages.	0.30	129.00
10/10/25	Joseph Kipp	Produce memorandum for P. Lohse's review summarizing TX caselaw.	2.10	903.00
10/10/25	Joseph Kipp	Synthesize TX caselaw memorandum into succinct email format for P. Lohse's review.	0.50	215.00
10/10/25	Paige Lohse	Preparations for hearing on LKC dispute (4.9); third-party claim evaluation (2.9); continue to prepare motion to enforce Purchase and Sale Agreement against Whinstone (1.1); confer with J. Kipp regarding requested research (.3).	9.20	5,888.00
10/10/25	Leah O'Farrell	Attention to question from P. Lohse regarding language for motion for emergency determination (.1); draft language regarding same (.2).	0.30	177.00
10/10/25	Leah O'Farrell	Review and provide comment on draft motion to continue hearing and draft proposed order regarding same.	0.40	236.00
10/10/25	Charlotte Underwood	Confer with plan proponents regarding LKC (.2); coordinate follow up with Kirkland (.1); follow up from plan filing (.2); correspond with client regarding amended schedules (.1).	0.60	570.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/10/25	Kenneth Kansa	Meeting with A. Wissel on settlement research (.4); call with T. Schmeltz regarding strategy (.3); review A. Popsecu email on schedules and email A. Popescu on same (.1); conference call with Province and Akin teams on liquidation analysis (1.0); review solicitation and disclosure statement materials (1.2).	3.00	3,210.00
10/10/25	Haley Casper	Prepare for (.3); and participate in interview call with C. Wheeler including take notes and circulate internally in furtherance of same (1.0).	1.30	682.50
10/10/25	Haley Casper	Communicate with K. Warren and P. Lohse regarding privilege research regarding Transcend matter in furtherance of case strategy (.2); prepare and send K. Warren overview and background on Transcend matter in furtherance of same (.2).	0.40	210.00
10/10/25	Haley Casper	Communication with P. Lohse regarding responding to LKC discovery requests (.2); begin review of requests and preparation of same (.2).	0.40	210.00
10/10/25	Anita Peterson	Review communication with M. Hurley regarding coordinating common interest call regarding discovery (.1); review communication with C. Potter regarding deposition (.1); communication with investigation team regarding same (.1); review communication with Akin regarding LKC dispute (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.60	222.00
10/10/25	Trace (Vincent P.) Schmeltz	Strategy calls with D. Eaton (.2); Special Committee Legal Team (.3); P. Tomasco (.3); SAFE AHG (.6); K. Kansa (.3); K. Matsoukas (.2); and M. Hurley (.2); text exchange with P. Lohse (.3).	2.40	2,400.00
10/10/25	Abigail Wissel	Meeting with K. Kansa to discuss legal research on the scope of considerations available in approving a settlement plan.	0.40	150.00
10/10/25	Kathleen L. Matsoukas	Prepare for and participate in discussion with C. Wheeler regarding tax allocation (1.0); communicate with team regarding possible	1.90	1,482.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		payment to LKC (.2); call with T. Schmeltz regarding strategy (.2); review and revise emergency motion (.3); communicate with team regarding same (.2).		
10/11/25	Joseph Kipp	Revise Exhibits attached to Special Committee's Motion to Enforce PSA against Whinstone.	0.30	129.00
10/11/25	Joseph Kipp	Research TX caselaw discussing the factors that courts consider when assessing punitive damage awards.	0.60	258.00
10/11/25	Joseph Kipp	Research TX caselaw describing the elements for fraudulent inducement.	0.40	172.00
10/11/25	Charlotte Underwood	Confer with plan proponents regarding discovery and related follow up (1.3); communications with T. Schmeltz and team regarding plan discovery and other ongoing briefing (1.1); correspond with C. Potter regarding discovery (.3).	2.70	2,565.00
10/11/25	Paige Lohse	Preparations for hearing on LKC dispute (1.7); preparations for plan confirmation discovery (.6); third-party claim evaluation (1.3).	3.60	2,304.00
10/11/25	Kenneth Kansa	Participate in morning call with Special Committee and SAFE teams on settlement terms and plan process (1.0); participate in pm call with Province, Special Committee, and SAFE teams on liquidation analysis (1.0); review emails on discovery disputes (.2); review C. Underwood emails on discussions and allocation of responsibilities on settlement issues with SAFE AHG (.1); review P. Lohse email on Temple Green (.1).	2.40	2,568.00
10/11/25	Anita Peterson	Communication with investigative team regarding LKC dispute (.1); communications with Akin regarding same (.2); review communications with Akin regarding depositions (.2); review communications regarding request for deposition dates, motion to compel (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.90	333.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/11/25	Kevin Warren	Evaluate scope of questioning for discovery plan and conduct related legal research.	5.20	2,236.00
10/11/25	Kathleen L. Matsoukas	Review and revise emergency motion on LKC hearing and payment of portion of fee, with related communication with team.	0.70	546.00
10/11/25	Trace (Vincent P.) Schmeltz	Participate in p.m. call with Province, Special Committee and SAFE teams on liquidation analysis.	1.00	1,000.00
10/12/25	Charlotte Underwood	Attention to plan discovery (.5); communications with P. Lohse regarding the same (.2); coordinate tax allocation meeting (.2).	0.90	855.00
10/12/25	Leah O'Farrell	Attention to emails regarding depositions and need for research on privilege related to motion to quash same (.1); review judge's procedures regarding calendaring, emergency motions and continuances and communication with P. Lohse regarding findings of same (.2); per conversation with P. Lohse add language regarding date of continued hearing and comment regarding judge's local procedures (.1).	0.40	236.00
10/12/25	Paige Lohse	Preparations for plan confirmation discovery (.2); preparations for hearing on Transcend dispute (.2); analyze and send correspondence and filings regarding recent developments (.7).	1.10	704.00
10/12/25	Kenneth Kansa	Review discovery dispute emails (.3); review materials for Wednesday hearing (.2).	0.50	535.00
10/12/25	Haley Casper	Analyze regarding privilege issues and communicate internally regarding strategy relating to same (.4); prepare analysis and overview regarding Transcend dispute and communicate internally regarding same (.4).	0.80	420.00
10/12/25	Haley Casper	Prepare responses to LKC discovery requests and communicate internally regarding strategy and next steps.	4.60	2,415.00
10/12/25	Anita Peterson	Review communication with Akin regarding draft Special Committee's emergency motion to continue LKC hearing (.1); review communications regarding call to discuss tax allocation and settlement (.2); review communications regarding request for	0.70	259.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		deposition dates (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).		
10/12/25	Trace (Vincent P.) Schmeltz	Prepare for (.3) and attend morning strategy call with Special Committee and SAFE teams on settlement terms and plan process (1.0); work on tax planning (.3); attend to discovery planning (.3).	1.90	1,900.00
10/12/25	Kathleen L. Matsoukas	Input changes to draft emergency motion to pay LKC fees and communicate with team regarding same.	0.60	468.00
10/13/25	Leah O'Farrell	Emails to K. Matsoukas regarding objection to motion to compel and draft regarding same (.1); attention to emails regarding setting call with PIC on ballot issues (.1); emails to K. Kansa, P. Lohse, and K. Matsoukas regarding pro hac (.1).	0.30	177.00
10/13/25	Leah O'Farrell	Attention to emails regarding list of voting parties for Class 10 and Class 11 (.1); attention to question from Clerk regarding filing of pro hac (.1).	0.20	118.00
10/13/25	Leah O'Farrell	Attention to messages from C. Underwood regarding voting lists, email to A. Popescu at Province regarding same (.1); call with K. Kansa regarding solicitation (.2); conversation with C. Underwood regarding objection to motion to compel (.1); email to K. Matsoukas regarding same (.1).	0.50	295.00
10/13/25	Leah O'Farrell	Draft email to Verita with information from Province and update address from Akin regarding voting lists (.2); attention to emails regarding meet and confer as to deposition (.1).	0.30	177.00
10/13/25	Leah O'Farrell	Research regarding motion to compel depositions including review motion to quash from Debtor.	1.80	1,062.00
10/13/25	Leah O'Farrell	Draft objection to motion to compel depositions.	1.10	649.00
10/13/25	Paige Lohse	Preparations for hearing on LKC dispute (5.8); confer with K. Matsoukas regarding outstanding discovery action items (.4); preparations for plan confirmation discovery (.2); preparations for	6.60	4,224.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		hearing on Transcend dispute (.2).		
10/13/25	Charlotte Underwood	Confer with client and Province, T. Schmeltz, K. Kansa regarding plan (.5); communication with T. Schmeltz regarding same (.2); attention to plan related discovery (.2); coordinate and manage plan preparation (.3).	1.20	1,140.00
10/13/25	Aaron Gavant	Review drafts relating to plan, disclosure statement and related discovery (.4); communications with BT team regarding same (.1).	0.50	402.50
10/13/25	Kenneth Kansa	Team call with Special Committee, Province, T. Schmeltz, C. Underwood (.5); conference call with Akin team on approach for Wednesday hearing (.5); t/c S. Schultz on disclosure statement and solicitation (.3); t/c L. O'Farrell on solicitation (.2); t/c to A. Popescu on solicitation (.2); review Transcend discovery motion (.3); email to A. Gavant on same (.1); review and respond to S. Schultz email on UCC inquiry (.1); review interim fee application (partial) (.2); review T. Schmeltz email on solicitation timeline (.1); review incoming pleadings (.3).	2.80	2,996.00
10/13/25	Anita Peterson	Review incoming 2025-10-13 (Pkt 1773) Transend's Notice of Deposition of Patricia Tomasco (.1); review incoming 2025-10-13 (Dkt 1774) LKC's Cross-Notice of Deposition of Patricia Tomasco (.1); review incoming 2025-10-09 (Dkt 33) Notice of Hearing in Transcend matter (.1); communication with investigation team regarding same (.1); review communication from Porter Hedges forwarding deposition notices and subpoenas (.2); review communication from C. Potter forwarding 2025-10-13 (Dkt 1776) Transcend Group's Emergency Motion to Compel Depositions (.1); review as-filed 2025-10-13 (Dkt 1777) Emergency Motion of the Special Committee to Continue Hearing on Objection to LKC (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3); review communications regarding request for deposition dates (.2);	2.10	777.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		review communications regarding motion to compel (.1); review communications regarding call to discuss tax allocation and settlement (.2); review communication from Porter Hedges forwarding 2025-10-13 LKC's Response to Special Committee's First Set of Requests for Production of Documents (.2); review communication from J. Miller regarding solicitation materials (.1); review communication with Akin regarding plan (.1).		
10/13/25	Haley Casper	Evaluate case updates and supplement internal records regarding status of depositions and pleadings (.3); communications with P. Lohse regarding next steps (.2).	0.50	262.50
10/13/25	Haley Casper	Draft and circulate responses to LKC dispute interrogatories and document requests (6.1); communicate with discovery team regarding strategy for same (.2).	6.30	3,307.50
10/13/25	Trace (Vincent P.) Schmeltz	Review materials on discovery disputes (.7); confer with K. Matsoukas regarding action items (.2); address tax allocation questions (.6); consider LKC strategy (.8); communicate with Riot/Whinstone counsel (.7); review and assess approach to plan confirmation (1.5).	4.50	4,500.00
10/13/25	Ning He	Analyze issues regarding energy credit claims.	1.20	924.00
10/13/25	Abigail Wissel	Review and revise draft of the Fourth Interim Fee Application (.9); draft Exhibit A for same (.8); communication with K. Kansa on same (.1).	1.80	675.00
10/13/25	Kathleen L. Matsoukas	Participate in discussion with SAFE AHG counsel and professionals regarding success fee negotiations (1.0); confer with T. Schmeltz regarding action items (.2); participate in follow-up discussion with SAFE AHG regarding LKC fee negotiations (.4); confer with P. Lohse regarding outstanding discovery action items (.4); multiple communications with counsel for Debtors and counsel for SAFE AHG regarding motion to quash depositions and strategy for same (1.8); review and revise emergency motion to continue LKC hearing and communicate with T. Schmeltz and P. Lohse regarding same (1.7).	5.50	4,290.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/13/25	Trace (Vincent P.) Schmeltz	Call with Special Committee, Province, K. Kansa, C. Underwood (.5); conference call with Akin team regarding hearing approach (.5).	1.00	1,000.00
10/14/25	Anna Bninski	Update matter tracking indices, including discovery responses and notices of deposition (.4); review team correspondence regarding depositions and objections (.2).	0.60	270.00
10/14/25	Paige Lohse	Preparations for hearing on LKC dispute (2.6); preparations for plan confirmation discovery (.2); analyze and send correspondence and filings regarding recent developments (.3); continue to prepare motion to enforce Purchase and Sale Agreement against Whinstone (3.1).	6.20	3,968.00
10/14/25	Leah O'Farrell	Revise draft objection to motion to compel and conducting further research regarding same.	1.10	649.00
10/14/25	Leah O'Farrell	Call with Verita regarding non-voting opt out notice (.2); revise opt-out notice regarding same (.1).	0.30	177.00
10/14/25	Leah O'Farrell	Review objection filed by Transcend Group to solicitation and conditional approval.	0.30	177.00
10/14/25	Leah O'Farrell	Email to K. Kansa and C. Underwood regarding change to opt out notice (.1); email to Plan Proponents regarding change to opt out notice (.1).	0.20	118.00
10/14/25	Leah O'Farrell	Review redlines on objection to motion to compel from K. Matsoukas and propose further revisions.	0.30	177.00
10/14/25	Leah O'Farrell	Research regarding objection to disclosure statement and contested matter and discovery related to same.	1.00	590.00
10/14/25	Leah O'Farrell	Review and finalize objection to motion to compel for filing.	0.10	59.00
10/14/25	Leah O'Farrell	Attention to inquiry from K. Matsoukas related to deadline to file objection to motion to compel (.1); coordinate filing with Clerk (.1).	0.20	118.00
10/14/25	Charlotte Underwood	Review objection to plan (.8); coordinate response (.3); call with Kirkland (.2); related follow up (.2); preparations for hearing (.8); review related materials, draft, and revise response to objection (1.2).	3.50	3,325.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/14/25	Randal J. Kaltenmark	Review proposed purchase price allocation in Motion and Declaration (.5); emails with P. Lohse regarding same (.3).	0.80	732.00
10/14/25	Kenneth Kansa	Review and update plan and disclosure statement (.6); circulate same to Plan Proponents with covering comments (.2); review Transcend objections to disclosure statement (.3); email to BT team on same (.1); review divestiture of jurisdiction case law (.3); email outline of responses on same to BT team (.4); email to L. O'Farrell on release opt-outs (.1); emails to S. Schultz on document revisions (.2); review Whinstone motion to enforce and email P. Lohse with comment on same (.1); draft responses to Transcend objections (.6); email to K. Matsoukas on same (.1); teleconference with T. Schmeltz on response to Transcend and discussions with Quinn Emanuel on same (.2); call with Quinn Emanuel and BT teams on discovery (.5); call with T. Schmeltz and K. Matsoukas on DS objection response (.5); call with Akin on meet and confer with Transcend (.5); meet and confer with Plan Proponents and Transcend (1.0); review Transcend objection to fee application (preliminary) (.2); communications with BT team on DS hearing and pleading revisions (.5).	6.40	6,848.00
10/14/25	Anita Peterson	Review communications regarding coordinating meet and confer relating to discovery matters (.3); review communication with Court regarding emergency hearing (.1); communication with investigation team regarding same (.1); review communication from C. Potter forwarding 2025-10-14 Transcend's Notice of Objection to Barnes & Thornburg's Twelfth Monthly Fee Statement (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.90	333.00
10/14/25	Haley Casper	Strategize regarding document review and production and create protocol in furtherance of same (2.5); review documents and communicate internally in furtherance of initial	5.20	2,730.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		production (2.3); communication with P. Lohse in furtherance of same (.4).		
10/14/25	Kevin Warren	Supplemental research based on scope of privilege waiver with respect to fee disputes.	4.30	1,849.00
10/14/25	Trace (Vincent P.) Schmeltz	Strategy call with client (.5); call with Kirkland & Ellis (.4); review and consider further disclosure statement amendments (1.2); teleconference with K. Kansa on response to Transcend and discussions with Quinn Emanuel on same (.2); call with P. Tomasco (Quinn Emanuel) and BT teams regarding strategy (.5); call with K. Matsoukas and K. Kansa to discuss further strategy (.5).	3.30	3,300.00
10/14/25	Abigail Wissel	Email to T. Schmeltz regarding Fourth Interim Fee Application.	0.10	37.50
10/14/25	Kathleen L. Matsoukas	Review and provide comments on motion to quash/response to motion to compel from Transcend and communicate with L. O'Farrell regarding same (2.3); communicate with P. Lohse regarding deposition notices for LKC (.2); review prior communications with Transcend in connection with opposition to discovery (.5); communicate with P. Tomasco regarding draft objection to the Transcend motion to compel (.2); work on additional disclosures in connection with Disclosure Statement proceedings and Transcend requests (2.4); call with T. Schmeltz and K. Kansa regarding supplemental disclosures and response to Transcend (.5); communicate with counsel for the SAFE AHG regarding supplemental disclosures and discovery (.5); prepare for and participate in discussion with Transcend counsel and other interested parties regarding resolving disclosure statement supplement and plan discovery (.6).	7.20	5,616.00
10/15/25	Joseph Kipp	Research TX and BK caselaw defining "reasonable notice" under FRCP 30.	0.80	344.00
10/15/25	Paige Lohse	Preparations for hearing on LKC dispute (3.9); confer with t. Schmeltz regarding discovery (.3); preparations for plan confirmation discovery (.3); analyze and send correspondence and	5.90	3,776.00

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Date	Name	Description	Hours	Amount
		filings regarding recent developments (1.4).		
10/15/25	Aaron Gavant	Multiple communications with BT team regarding hearing developments and anticipated next steps.	0.50	402.50
10/15/25	Leah O'Farrell	Review confirmation dates per December 3 confirmation hearing (.1); revise confirmation dates per note from K. Kansa to move objection deadline earlier (.1) email to BT and Akin regarding same (.1).	0.30	177.00
10/15/25	Leah O'Farrell	Attention to emails suggestions on confirmation timeline.	0.10	59.00
10/15/25	Kenneth Kansa	T/c C. Underwood on disclosure statement-related filings (.2); t/c A. Wissel on fee application (.1); prepare for disclosure statement/solicitation procedures hearing, including numerous conferences with T. Schmeltz, S. Schultz (.4), M. Hurley (.5); email to N. He and M. Mathur on response to fee application objection (.2); email to T. Schmeltz and A. Wissel on interim fee application (.2); review solicitation materials in advance of hearing (1.7); review R. Izakelian email on disclosure statement (.1); revise disclosure statement draft and email to R. Izakelian on same (.9); email to R. Izakelian on disclosure statement revisions (.1); review further disclosure statement revisions (.9); call with T. Schmeltz, M. Hurley, and S. Schultz in preparation for DS hearing (.3); call with Debtors'/SC team on DS hearing (.5); all-parties call regarding settlement proposals in advance of hearing (.4); conferences with T. Schmeltz in advance of DS hearing (.6); prepare for disclosure statement hearing (2.0); participate in in-person pre-discussions for disclosure statement hearing (.7); participate in disclosure statement hearing (.5); follow up discussions with SAFE AHG and Debtors on revisions to liquidation analysis and disclosure statement (.6); revise release provisions of Plan per Court comments at DS hearing (partial) (2.0); review Proof Capital settlement materials at T. Schmeltz request (.7); email to T. Schmeltz on	13.80	14,766.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		same (.2).		
10/15/25	Anita Peterson	Communication with investigation team regarding hearing and assist attorneys in executing strategy per request of P. Lohse focusing on precise tracking and timely updates of deadlines and filings (.2); communications with investigative team regarding depositions (.1); review incoming 2025-10-14 (Dkt 1788) LKC's Response to Special Committee's Emergency Motion to Continue (.1); review incoming 2025-10-14 (Dkt 1789) LKC's Emergency Motion to Compel Responses to Discovery Requests (.1); review incoming SAFE AHG's Objection to LKC's Emergency Motion to Compel Responses to Discovery Requests (.1); review communications regarding coordinating meet and confer relating to discovery matters (.2); review communications from C. Potter forwarding Transcend Group's First Request for Production and First Set of Interrogatories to SAFE AHG (.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 from Akin regarding proposed SAFE AHG filings (.1); review communications with Quinn Emanuel regarding Court dates (.1); review communications with Porter Hedges forwarding letter regarding depositions, initial production in response to discovery requests (.2).	1.60	592.00
10/15/25	Anna Bninski	Review correspondence from P. Lohse regarding letter to LKC regarding depositions.	0.10	45.00
10/15/25	Haley Casper	Evaluate case filings regarding LKC dispute and communicate internally regarding status.	0.10	52.50
10/15/25	Haley Casper	Coordinate regarding preparation and review of documents in furtherance of production in LKC dispute including review documents and communicate internally regarding same.	0.70	367.50
10/15/25	Charlotte Underwood	Draft response to objection to disclosure statement (1.1); pre-hearing calls (.8); call with K. Kansa regarding disclosure statement filings	5.00	4,750.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.2); communications with team regarding plan confirmation (.8); communications with T. Schmeltz regarding conflict matters (.4); provide support to hearing (.5); review and revise disclosure statement changes (.4); review discovery served to SAFE AHG (.2); confer with relevant parties regarding insurance reimbursement (.3); confer with K. Kansa regarding plan (.3).		
10/15/25	Trace (Vincent P.) Schmeltz	Calls with M. Robinson (.2); D. Eaton (.4); and S. Schultz and K. Kansa (.4) to discuss court strategy; prepare for and attend court (5.2).	6.20	6,200.00
10/15/25	Abigail Wissel	Call with K. Kansa regarding the Fourth Interim Fee Application.	0.10	37.50
10/15/25	Carrie M. Raver	Strategize regarding ways to get reimbursed for derivative investigation costs.	0.60	507.00
10/15/25	Carrie M. Raver	Correspond with insurer and client regarding insurance agreement to reimburse derivative investigation costs.	0.20	169.00
10/15/25	Kathleen L. Matsoukas	Review current draft of supplemental disclosures and communicate with team regarding same (.3); prepare for and participate in discussion with counsel for Debtors and counsel for SAFE AHG regarding supplemental disclosures and discovery plan (.6); participate in discussion with Transcend group and other counsel regarding discovery plan for plan confirmation and disclosure statement (.5); communicate with team regarding objection to subpoena for testimony in LKC matter (1.2); draft and revise letter objecting to deposition notices (1.7); prepare for and participate in hearings on discovery issues and conditional plan approval (.8).	5.10	3,978.00
10/15/25	Trace (Vincent P.) Schmeltz	Call with M. Hurley and K. Kansa (.5); call with M. Hurley, and S. Schultz and K. Kansa in preparation for disclosure statement hearing (.3); conferences with K, Kansa in advance of disclosure statement hearing (.6).	1.40	1,400.00
10/16/25	Charlotte Underwood	Confer with Debtors and Province regarding upcoming briefing and plan confirmation (.9);	1.80	1,710.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		related follow up (.2); communications with P. Lohse regarding LKC related discovery (.4); review disclosure statement and plan revisions (.3).		
10/16/25	Joseph Kipp	Research caselaw on deposition and fee award issues (4.5); synthesize findings and send to P. Lohse for review (.5).	5.00	2,150.00
10/16/25	Joseph Kipp	Research Fifth Circuit caselaw distinguishing whether moving for a protective order is necessary or sufficient to overcome a notice of deposition.	0.30	129.00
10/16/25	Leah O'Farrell	Attention to message from K. Kansa to update Verita with proposed confirmation dates and email to Verita regarding same.	0.20	118.00
10/16/25	Leah O'Farrell	Review docket regarding applications to employ per request of P. Lohse (.2); investigate docket regarding same and discuss hearing audio with P. Lohse (.4); follow up regarding same as it relates to LKC emergency motion to compel discovery (.2).	0.80	472.00
10/16/25	Anita Peterson	Communication with investigative team regarding expedited discovery schedule (.1); review communications with K. Hays regarding deposition (.2); review communications with Chase Blackmon regarding deposition (.2); review communications with Porter Hedges regarding conferral, depositions, expedited discovery schedule (.2); review communications with C. Potter regarding liquidation analysis (.2); review communication with Akin regarding plan (.1); review communication with J. Miller regarding hearing (.1); review as-filed 2025-10-16 (Dkt 1811) Notice of Service regarding Discovery (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	1.50	555.00
10/16/25	Paige Lohse	Preparations for discovery and hearing on LKC dispute (6.1); review and revise LKC discovery responses and documents (6.0).	12.10	7,744.00
10/16/25	Anna Bninski	Correspond with P. Lohse regarding discovery	0.50	225.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		requests (.1); review production (.1); update log regarding same (.2); correspond with P. Lohse regarding document review (.1).		
10/16/25	Haley Casper	Draft and prepare notice of service regarding Special Committee's discovery responses to LKC.	0.30	157.50
10/16/25	Haley Casper	Communication with P. Lohse regarding C. Wheeler and K. Hays deposition preparation (.1); analyze documents and prepare for depositions (5.5); communicate with investigative team regarding same (.2).	5.80	3,045.00
10/16/25	Megha Mathur	Draft pro hac vice forms.	0.70	336.00
10/16/25	Kevin Warren	Draft analysis of scope of waiver with respect to LKC dispute for P. Lohse in furtherance of supporting discovery plan.	2.20	946.00
10/16/25	Kevin Warren	Draft notice of deposition for J. Cohn and LKC for P. Lohse to prepare for depositions in LKC fee dispute, with related evaluation of the topics and categories to be inquired into at deposition.	3.40	1,462.00
10/16/25	Kevin Warren	Communications with P. Lohse regarding approach to document review and production plan.	1.20	516.00
10/16/25	Trace (Vincent P.) Schmeltz	Address LKC claims (.7); work on tax allocation questions and motion (.9); confer with P. Lohse regarding discovery (.3); confer with D. Dunn and M. Robinson regarding administrative issues (.4); attend to emails on case (1.5).	3.80	3,800.00
10/16/25	Kenneth Kansa	Call with Debtors/Province/Special Committee on liquidation analysis (.5); t/c D. Dunn on plan revisions (.1); t/cs A. Popescu on liquidation analysis (.2); t/cs S. Schultz on plan releases (.3); review and revise plan release language (.5); confer with M. Mathur and N. He regarding fee objection response (.4); circulate same to Debtors/SAFE AHG/BT teams with covering comments (.3); email to Special Committee on same (.1); email to S. Schultz on release language (.1); email S. Schultz regarding plan release language (.1); email to P. Tomasco on release language (.1); emails to S. Schultz on plan revisions (.1); email to Province and SAFE	6.40	6,848.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		AHG teams on liquidation analysis revisions (.3); email to C. Potter on liquidation analysis (.1); further review liquidation analysis and emails to A. Popescu on same (.4); review SAFE AHG comments on disclosure statement and email to BT team on same (.6); email to Province and SAFE AHG on liquidation analysis (.1); email to C. Potter on liquidation analysis (.1); email to Special Committee on same (.1); email to R. Izakelian on disclosure statement revisions (.3); email to D. Eaton on liquidation analysis (.1); email to L. Weber on Plan releases (.1); further email to S. Schultz on DS filing (.1); further review of disclosure statement revisions following from 10/15 hearing (.6); further review of release provisions and research on comparables for same (.4); review solicitation scheduling materials (.3).		
10/16/25	Ning He	Analyze documents regarding LKC fee issues.	3.30	2,541.00
10/16/25	Carrie M. Raver	Address status of bankruptcy issues with AIG regarding Proman claim.	0.30	253.50
10/16/25	Carrie M. Raver	Address payment of derivative investigation cost issues.	0.20	169.00
10/16/25	Kathleen L. Matsoukas	Multiple communications with P. Lohse regarding plan for LKC discovery and progress of document reviews and collection (.8); review Transcend pleadings and consider potential discovery issues for motion to remand (.8).	1.60	1,248.00
10/17/25	Anita Peterson	Review communications regarding deposition logistics (.2); review communications with R. Mates regarding depositions (.2); review communications with C. Wheeler regarding deposition (.1); review communications with C. Potter regarding liquidation analysis (.2); review communication from C. Potter forwarding 2025-10-15 Transcend Group's Notice of Objection to Quinn Emanuel Twelfth Monthly Fee Statement (.1); review communication with K. Hays regarding deposition (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	1.20	444.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/17/25	Paige Lohse	Preparations for hearing on LKC dispute (4.4); confer with M. Mathur regarding LKC document review (.7); LKC discovery and document responses (2.9); confer with C. Underwood and N. He regarding LKC dispute (.7); LKC conferrals (1.2); analyze and send correspondence and filings regarding recent developments (.6); continue to prepare motion to enforce Purchase and Sale Agreement against Whinstone (1.1).	11.60	7,424.00
10/17/25	Anna Bninski	Collect information from prior Chase Blackmon interview and forward same to C. Underwood.	0.20	90.00
10/17/25	Melissa Bonnici	Strategize approach to document review for LKC dispute per request of P. Lohse.	1.20	516.00
10/17/25	Haley Casper	Analyze documents and prepare for C. Wheeler deposition including simultaneously analyze and prepare documents in furtherance of production in response to LKC requests for production (9.7); analyze materials and documents in furtherance of Chase Blackmon deposition and strategize internally regarding same (.2); communications with discovery team regarding same and strategy for production (1.2).	11.10	5,827.50
10/17/25	Thomas G. Haskins	Analysis of strategy regarding LKC dispute.	0.20	159.00
10/17/25	Kenneth Kansa	T/c M. Robinson on plan status (.2); t/c L. O'Farrell on solicitation issues (.3); t/cs S. Schultz on DS revisions (.3); review RJ Shannon email on liquidation analysis (.1); email to C. Underwood on same (.1); review and revise disclosure statement (.5); circulate same to C. Potter and Plan Proponents with covering comments (.1); review C. Potter request on liquidation analysis and email Province and Plan Proponents on same (.1); emails to L. O'Farrell on plan and disclosure statement (.1); email to R. Izakelian on liquidation analysis (.1); emails to R. Izakelian on revised disclosure statement (.2); email to M. Mathur on pleadings (.1); review 502(d) motion and email BT team on same (.2); email to Plan Proponents on liquidation analysis (.1); review	2.80	2,996.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		liquidation analysis and further emails to Plan Proponents on same (.3).		
10/17/25	Megha Mathur	File notice of appearance for T. Haskins.	0.10	48.00
10/17/25	Megha Mathur	Review Document Review Protocol at direction of P. Lohse.	0.60	288.00
10/17/25	Megha Mathur	Confer with P. Lohse regarding background on LKC dispute and needed document review.	0.70	336.00
10/17/25	Megha Mathur	Review documents to respond to LKC's discovery requests.	0.60	288.00
10/17/25	Leah O'Farrell	Revise dates in disclosure statement per email from K. Kansa.	0.40	236.00
10/17/25	Leah O'Farrell	Update solicitation materials with revised dates and release language (1.5); call with K. Kansa regarding same (.3).	1.80	1,062.00
10/17/25	Leah O'Farrell	Call with J. Miller from Verita regarding open items on solicitation.	0.20	118.00
10/17/25	Charity Seaborn	Communications with document review team regarding the document review protocol in preparation of reviewing and identifying relevant client documents responsive to requests for production.	1.40	672.00
10/17/25	Charlotte Underwood	Confer with N. He and P. Lohse regarding LKC dispute (.7); review notice of objection to fee app (.1); manage and oversee document review for LKC response (.9).	1.70	1,615.00
10/17/25	Kevin Warren	Identify and review key documents related to LKC's discovery requests to assist P. Lohse in preparing for depositions.	4.70	2,021.00
10/17/25	Kevin Warren	Evaluate draft Rule 502(d) Order to assist P. Lohse and N. He in revising the same.	0.80	344.00
10/17/25	Kevin Warren	Draft initial exhibit index and witness preparation outline for Chase Blackmon and related key documents regarding LKC fee dispute.	4.10	1,763.00
10/17/25	Trace (Vincent P.) Schmeltz	Attend tax allocation strategy call (1.0); conference calls with A. Popescu, M. Robinson and K. Hays regarding strategy (.6); attend meet and confer on LKC discovery (.5).	2.10	2,100.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/17/25	Ning He	Revise motion and order regarding 502(d) protection (2.9); confer with P. Lohse and C. Underwood regarding LKC (.7).	3.60	2,772.00
10/17/25	Carrie M. Raver	Receive call from Allied World (outside coverage counsel) regarding wire transfer and ETA for payment issues and email to team regarding same.	0.20	169.00
10/17/25	Kathleen L. Matsoukas	Continue work on arguments for motion to remand and potential discovery issues and communicate with team regarding same (1.2); work on outline for Chase Blackmon deposition preparation (.6); review draft Rule 502 motion and communicate with team regarding same (.5).	2.30	1,794.00
10/18/25	Paige Lohse	Preparations for hearing on LKC dispute (4.1); LKC discovery and document responses (5.3).	9.40	6,016.00
10/18/25	Charity Seaborn	Review documents to determine responsiveness to LKC's discovery requests.	3.20	1,536.00
10/18/25	Charity Seaborn	Review documents to determine responsiveness to LKC's discovery requests.	3.30	1,584.00
10/18/25	Charity Seaborn	Review documents to determine responsiveness to LKC's discovery requests.	2.40	1,152.00
10/18/25	Melissa Bonnici	Perform document review for the dispute with LKC.	7.30	3,139.00
10/18/25	Haley Casper	Review documents and prepare for C. Wheeler and K. Hays depositions including communicate with investigative team regarding same and strategy (7.8); communications with P. Lohse regarding preparation for depositions and next steps (.7).	8.50	4,462.50
10/18/25	Megha Mathur	Review documents to respond to LKC's discovery requests.	0.50	240.00
10/18/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on precise tracking and timely updates of deadlines and filings (.2); review communications with K. Hays regarding deposition (1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.1); review	0.80	296.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		communication from Akin regarding liquidation analysis (.1); review communication from Quinn Emanuel regarding liquidation analysis (.1); review incoming LKC Notice of Deposition of Chase Blackmon, LKC Notice of Deposition of Cameron Blackmon, LKC Notice of Deposition of Kevin Hays, Notice of Rule 30(B)(6) Deposition of the Debtors' Corporate Representative, LKC's Second Set of Requests for Production to Debtors and assist attorneys in executing strategy per request of P. Lohse focusing on precise tracking and timely updates of deadlines and filings (.2).		
10/18/25	Joseph Tate	Communications with P. Lohse and K. Warren to discuss search terms and document review workflows (.3); prepare search term reports, perform database searches, and create multiple document review batching assignments for multiple associate reviewers (2.9).	3.20	1,216.00
10/18/25	Kevin Warren	Evaluate documents implicated by the Chase Blackmon searches for responsiveness to assist P. Lohse to prepare for production.	4.80	2,064.00
10/18/25	Kevin Warren	Strategize approach to review with P. Lohse and review team.	2.30	989.00
10/18/25	Kevin Warren	Review 'key documents' identified by review team related to revised engagement letter negotiations and related issues in LKC dispute to prepare initial draft of witness exhibit index.	2.50	1,075.00
10/18/25	Kevin Warren	Draft initial witness exhibit list of Chase Blackmon with key documents with respect to LKC fee dispute to assist P. Lohse and K. Matsoukas in preparation for depositions.	3.10	1,333.00
10/18/25	Kathleen L. Matsoukas	Work with P. Lohse regarding motion to enforce PSA and Wheeler testimony.	0.50	390.00
10/19/25	Charity Seaborn	Review documents to determine responsiveness to LKC's discovery requests.	4.60	2,208.00
10/19/25	Charity Seaborn	Verify tagged documents to ensure responsive per document review protocol.	1.10	528.00
10/19/25	Paige Lohse	Preparations for hearing on LKC dispute (5.4); call with T. Schmeltz regarding strategy (1.1); LKC discovery and document responses (5.1);	12.90	8,256.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		confer with K. Mangan regarding document review (1.3).		
10/19/25	Melissa Bonnici	Perform document review for dispute with LKC.	3.50	1,505.00
10/19/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on deposition preparation (.7); review communications with Chase Blackmon regarding deposition, deposition preparation (.2); review communications with K. Hays regarding deposition, deposition preparation (.2); review communications regarding 2025-10-19 Special Committee's deposition of Jonathan Cohn (.2); review communications regarding disclosure statement (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	1.80	666.00
10/19/25	Megha Mathur	Review documents to respond to LKC's discovery requests.	7.00	3,360.00
10/19/25	Kenneth Kansa	Email Quinn Emanuel and Akin teams on liquidation analysis (.1); email to T. Schmeltz on status of revised Plan and DS (.1); review Akin comments on plan release language revisions to pick up Judge Pérez's comments (.2); email S. Baham on same (.2); prepare draft notice of filing of revised plan and DS (.3); circulate same to Akin team with covering comments (.1); email to K. Matsoukas on LKC order (.1); email to S. Schultz and Akin team on notice of filing (.1); review revisions to Plan and Disclosure Statement (.9); email to Quinn Emanuel and Akin teams on same (.1); t/c T. Schmeltz on LKC order (.1); emails to P. Lohse and L. O'Farrell on same (.1); further review of disclosure statement revisions and email to R. Izakelian on same (.6); further emails to Akin and Quinn Emanuel teams on plan and disclosure statement filing (.3); review C. Potter response to disclosure statement revisions (.1); email to S. Schultz on same (.1); review N. He email on 502(d) motion (.1); review LKC discovery emails (.2).	3.80	4,066.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/19/25	Kathleen Mangan	Review and tag Chase Blackmon documents for relevance and production.	12.10	5,203.00
10/19/25	Kathleen Mangan	Confer with P. Lohse regarding case overview and document review assignment.	1.30	559.00
10/19/25	Mariah A. Whitner	Review client documents for responsiveness to discovery requests, in satisfaction of discovery obligations.	2.60	1,534.00
10/19/25	Mariah A. Whitner	Communications with P. Lohse regarding document review protocol.	1.30	767.00
10/19/25	Haley Casper	Prepare for K. Hays and C. Wheeler depositions, review documents, and simultaneously prepare documents for production in response to LKC document requests.	13.80	7,245.00
10/19/25	Joseph Tate	Perform database searches and create and assign document review batch assignments for associate review teams (2.5); prepare .CSV file of corrupt files and send to client for analysis (.4).	2.90	1,102.00
10/19/25	Megha Mathur	Analyze correspondence regarding recent developments.	1.00	480.00
10/19/25	Addison Smith	Review background materials and document review protocol (.7); review documents to respond to LKC's discovery requests (4.0).	4.70	2,773.00
10/19/25	Kevin Warren	Coordinate batch review of documents responsive to sub-set searches with restrictive date ranges to associate review team to assist P. Lohse in preparing for production, with related evaluation of documents identified by review team as further review with respect to responsiveness to respond to LKC requests in preparation of hearing on LKC fee application.	3.50	1,505.00
10/19/25	Kevin Warren	Evaluate documents in review database with respect to Chase Blackmon searches to identify responsive documents for production, along with supplement of key exhibit list to prepare for depositions and hearing related to LKC fee dispute.	3.20	1,376.00
10/19/25	Kevin Warren	Supplement key exhibit index to prepare to draft witness outlines for depositions to assist T.	3.40	1,462.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Schmeltz and P. Lohse to prepare for depositions in LKC fee dispute.		
10/19/25	Trace (Vincent P.) Schmeltz	Communications with larger team regarding LKC strategy and privilege concerns (1.2); call with K. Kansa regarding LKC order (.1); call with D. Eaton regarding strategy and next steps (.4); call with P. Lohse to outline strategy (1.1); call with P. Tomasco (.2); call with R. Mates regarding remand hearing and LKC discovery (.3); call with M. Robinson regarding LKC (.4); call with C. Topping regarding LKC discovery (.3).	4.00	4,000.00
10/19/25	Glenn R. de Roziere	Communicate with K. Warren regarding factual research regarding upcoming deponents.	0.10	38.50
10/19/25	Ning He	Revise motion for 502(d) protection for filing.	0.50	385.00
10/19/25	Kathleen L. Matsoukas	Communicate with K. Kansa and L. O'Farrell regarding submission of order on transfer of funds to LKC.	0.40	312.00
10/20/25	Joseph Kipp	Draft Special Committee's Responses and Objections to LKC's Second Set of Requests for Production.	0.50	215.00
10/20/25	Megha Mathur	Review documents to respond to LKC's discovery requests.	2.50	1,200.00
10/20/25	Joseph Kipp	Revise Special Committee's Responses and Objections to LKC's Second Set of Requests for Production.	0.20	86.00
10/20/25	Scott Pelozza	Review and analyze documents in preparation for deposition of Cameron Blackmon and draft related deposition outline.	1.70	1,088.00
10/20/25	Leah O'Farrell	Draft order on partial payment of fee application (.3); attention to emails with edits and incorporating same into order (.2).	0.50	295.00
10/20/25	Leah O'Farrell	Review local procedures on proposed order and draft notice of proposed order (.4); confer with N. He regarding motion to seal hearing (.2).	0.60	354.00
10/20/25	Aaron Gavant	Review revised disclosure statement and related filings (.5); follow up communications with BT team regarding same and next steps (.6).	1.10	885.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/20/25	Kenneth Kansa	Participate in hearing prep call with Quinn Emanuel and Akin teams (.5); participate in disclosure statement hearing (.2); review materials in preparation for disclosure statement hearing (.3); t/c with S. Schultz post-hearing (.1); review proposed order authorizing payment to LKC and email L. O'Farrell with comments on same (.3); review revisions to disclosure statement order (.2); email to R. Izakelian on same (.1); revisions to notice of proposed order on LKC payment (.1); email to J. Wolfshohl on same (.1); review and revise solicitation materials (1.8); emails to Quinn Emanuel and Akin teams on same (.5); email to N. He on 502(d) order (.1); review incoming pleadings (.3); review discovery emails (.3); review confirmation timeline and note settlement-related tasks to be prepared in advance of confirmation (.6).	5.50	5,885.00
10/20/25	Charlotte Underwood	Coordinate calls with stakeholders (.1); confer with N. He regarding production (.2); support to team working on LKC dispute (.3).	0.60	570.00
10/20/25	Anita Peterson	Review as-filed 2025-10-19 (Dkt 1824) Special Committee's Amended Emergency Motion for Entry of Protective Order, 2025-10-19 (Dkt 1824-1) (proposed) Order Granting Emergency Motion for Entry of Protective Order (.2); assist attorneys in executing strategy per request of P. Lohse focusing on deposition preparation, logistics (1.0); assist attorneys in executing strategy per request of P. Lohse regarding deposition of J. Cohn including coordinating logistics, court reporter (.9); communication with counsel forwarding instructions for joining 10/29/2025 deposition of J, Cohn (.2); precise tracking and timely updates of deadlines and filings (.8); communications with K. Kansa regarding monthly fee application (.2); communications with investigative team regarding draft responses to LKC's second set of requests of production of documents (.2); review incoming 2025-10-20 (Dkt 1827) Order Resetting LKC Fee Hearing (.1); communications with investigation team	5.90	2,183.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		regarding same (.1); review communications with Chase Blackmon regarding deposition, deposition preparation (.3); review communications regarding deposition of K. Hays (.2); review communications regarding depositions (.3); review communications with Cameron Blackmon regarding deposition, deposition preparation (.2); review communications with Akin regarding motion, requested information (.2); review communication with C. Wheeler regarding requested information (.2); review communications with Company regarding document requests and assist attorneys in executing strategy per request of N, He (.3); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.5).		
10/20/25	Paige Lohse	Preparations for hearing on LKC dispute (6.1); LKC discovery and document responses (8.3).	14.40	9,216.00
10/20/25	Mariah A. Whitner	Review client documents to assess responsiveness in compliance with discovery obligations.	6.10	3,599.00
10/20/25	Mariah A. Whitner	Review documents prior to production.	1.90	1,121.00
10/20/25	Melissa Bonnici	Review documents for purposes of production at the direction of P. Lohse.	3.20	1,376.00
10/20/25	Anna Bninski	Update case file to track moving projects and deadlines, including documentation of individual and 30(b)(6) deposition notices by LKC and discovery request.	0.70	315.00
10/20/25	Charity Seaborn	Conduct quality control check on responsive documents in preparation for document production.	4.30	2,064.00
10/20/25	Haley Casper	Prepare for K. Hays deposition; review documents, strategize, and coordinate document productions in response to LKC requests in furtherance of same.	12.50	6,562.50
10/20/25	Haley Casper	Prepare for and attend call with J. Cohn, including take and circulate notes regarding	1.20	630.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		same (1.0); call with T. Schmeltz and communicate and coordinate internally regarding next steps regarding same (.2).		
10/20/25	Megha Mathur	Review documents for revisions to Purchase and Sale Agreement.	0.50	240.00
10/20/25	Addison Smith	Review documents to respond to LKC's discovery requests.	4.40	2,596.00
10/20/25	Kevin Warren	Evaluate documents with respect to the underlying Whinstone dispute and exit financing to support discovery strategy in LKC dispute and in furtherance of preparing for Chase Blackmon deposition.	3.20	1,376.00
10/20/25	Kevin Warren	Evaluate documents within key exhibit list related to LKC dispute identified by review team to narrow down to key documents for Chase Blackmon deposition.	4.40	1,892.00
10/20/25	Kevin Warren	Draft initial witness module sets utilizing key documents identified by review team to support strategy on key issues related to LKC fee dispute.	4.30	1,849.00
10/20/25	Kevin Warren	Coordinate preparation of witness exhibits in respective issue modules to A. Peterson and K. Murphy, to prepare for upcoming depositions in LKC fee dispute, with related review of the same.	1.90	817.00
10/20/25	Trace (Vincent P.) Schmeltz	LKC meet and confer (.7); work on LKC discovery (2.1); call with H. Casper regarding next steps (.2); address matter strategy (1.6); tax allocation brief revisions (.9).	5.50	5,500.00
10/20/25	Glenn R. de Roziere	Review background information (.2); correspond with K. Warren (.2); follow up regarding same including outline steps for deposition preparation, review background on two of the subjects to be deposed, compile facts into a short report, and outline relevant findings (3.8).	4.20	1,617.00
10/20/25	Janelle Peters	Run search terms and provide total document counts to case team (1.5); create assignment group for case team to review documents (.5); create searches for case team and share with case team (1.0).	3.00	795.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/20/25	Kathleen L. Matsoukas	Prepare for and participate in LKC discovery conferral call (.7); work on deposition outlines and preparation for upcoming depositions in LKC matter, including Chase Blackmon, and review pertinent documents (5.5); communicate with team regarding coverage and key points for deposition preparation (1.5).	7.70	6,006.00
10/20/25	Ning He	Analyze cases regarding motion to seal (1.5); draft motion to seal (4.3); confer with C. Underwood regarding production (.2); analyze documents regarding LKC dispute (3.3); confer with L. O'Farrell regarding motion to seal hearing (.2).	9.50	7,315.00
10/21/25	Charlotte Underwood	Call with Riveron regarding schedules (1.0); communications with T. Schmeltz regarding ongoing matters (.2); communications with P. Lohse and N. He regarding production and ongoing projects (.4).	1.60	1,520.00
10/21/25	Joseph Kipp	Review Whinstone trial transcripts and analyze testimony discussing power credits (2.0); analyze findings and send summary to P. Lohse (.4).	2.40	1,032.00
10/21/25	Joseph Kipp	Communications with N. He regarding Whinstone trial transcripts.	0.20	86.00
10/21/25	Leah O'Farrell	Attention to inquiry from P. Lohse regarding pro hac applications and teams conversation regarding same (.1); email to Clerk regarding same (.1). attention to email from Clerk regarding status of pro hacs for P. Lohse and K. Matsoukas (.1).	0.30	177.00
10/21/25	Joseph Kipp	Review Whinstone trial transcripts to identify testimony regarding the value of Rhodium's power contracts and send findings to N. He and P. Lohse for review.	1.40	602.00
10/21/25	Aaron Gavant	Review discovery developments (.3); communications with BT team regarding potential bankruptcy impact on same (.2).	0.50	402.50
10/21/25	Melissa Bonnici	Review documents and perform quality check regarding documents to be produced.	5.80	2,494.00
10/21/25	Scott Peloza	Draft deposition preparation outline for deposition of Cameron Blackmon including	7.00	4,480.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		review and analyze related documents.		
10/21/25	Anita Peterson	Review as-filed 2025-10-21 (Dkt 1834) Order approving Disclosure Statement, Scheduling Hearing (.2); communications with investigative team regarding same (.2); precise tracking and timely updates of deadlines and filings (.2); assist attorneys in executing strategy per request of T. Schmeltz focusing on preparation for depositions (2.8); conference with Chase Blackmon, T. Schmeltz, K. Warren, K. Matsoukas regarding deposition preparation (3.6); communication with R. Mates, C. Topping, M. Soule, P. Tomasco regarding Zoom link for 10/22/2025 deposition of Chase Blackmon (.1); communications with R. Mates regarding deposition of Chase Blackmon, Cameron Blackmon (.2); communications with C. Topping regarding LKC discovery responses (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); review communications with Porter Hedges, LKC regarding document production, 2025-10-21 Special Committee's Objections to LKC's Second Set of Document Requests (.3); review communications with Akin regarding supplemental document production, 2025-10-21 Special Committee's Objections to LKC's Second Set of Document Requests (.3); review communications with Cameron Blackmon regarding deposition (.2); review communications with Chase Blackmon regarding deposition preparation (.2); review communications regarding 30(b)(6) depositions (.2); review communications with C. Wheeler regarding requested documents (.2); review communication with A. Popescu regarding financing (.1); review communication with A. Popescu regarding September MORs (.1); communications with R. Mates regarding depositions of Chase and Cameron Blackmon (.2); review communications with C. Topping regarding deposition of Chase Blackmon (.2).	9.90	3,663.00
10/21/25	Paige Lohse	Address LKC discovery and document	14.40	9,216.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		responses.		
10/21/25	Charity Seaborn	Continue document review in preparation for identifying responsive documents to LKC discovery requests and exhibits for depositions.	2.70	1,296.00
10/21/25	Charity Seaborn	Conduct quality control review of documents marked responsive to ensure accuracy and identify privileged documents to be withheld.	2.00	960.00
10/21/25	Kenneth Kansa	Review disclosure statement order and circulate same to BT team (.2); emails to Quinn Emanuel team on severance benefits exhibit to Plan (.6); email to SAFE AHG counsel on same (.2); further emails to SAFE AHG on same (.3); participate in coordination call with Quinn Emanuel team (.5); review solicitation emails (.2); review A. Wissel memo on settlement considerations in Fifth Circuit (.2); review additional emails from noticing agent and Quinn Emanuel team on commencement of plan solicitation (.4); review incoming pleadings (.2); outline next steps on implementation of settlements in plan and tasks to be completed in advance of confirmation (.6).	3.40	3,638.00
10/21/25	Haley Casper	Prepare for K. Hays deposition and assist in preparation for Chase and Cameron Blackmon depositions including review of documents and coordination of document production regarding same.	15.50	8,137.50
10/21/25	Megha Mathur	Review documents for revisions to Purchase and Sale Agreement.	1.70	816.00
10/21/25	Lydia Parks	Assist with preparing for Cameron Blackmon deposition preparation including document review for hot documents.	2.10	903.00
10/21/25	Anna Bninski	Review privilege update from P. Lohse.	0.10	45.00
10/21/25	Megha Mathur	Analyze recent correspondence regarding recent developments.	1.00	480.00
10/21/25	Addison Smith	Review documents to respond to LKC's discovery requests.	6.60	3,894.00
10/21/25	Kevin Warren	Supplement witness outline for Chase Blackmon with final modules, with related finalizing of exhibits for deposition preparation	6.70	2,881.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		to assist T. Schmeltz and K. Matsoukas with the same to support approach to LKC fee dispute.		
10/21/25	Kevin Warren	Prepare for deposition preparation session with Chase Blackmon (.7); participate in Chase Blackmon deposition preparation session in LKC fee dispute with T. Schmeltz and K. Matsoukas (3.6).	4.30	1,849.00
10/21/25	Kevin Warren	Assist S. Pelozza to prepare Cameron Blackmon for deposition in LKC dispute with related coordination of identifying key documents by L. Parks and E. Carpenter.	2.80	1,204.00
10/21/25	Trace (Vincent P.) Schmeltz	Work on LKC litigation (4.1); call regarding tax allocation (.7).	4.80	4,800.00
10/21/25	Glenn R. de Roziere	Review and analyze Illinois public records regarding the background of witness (.4); prepare full report with findings and conclusions (.8); email to K. Warren on findings (.2).	1.40	539.00
10/21/25	Kathleen L. Matsoukas	Participate in team call with Debtors' counsel (.3); prepare for deposition preparation session for Chase Blackmon (1.1); participate in preparation session for Chase Blackmon with T. Schmeltz and K. Warren in advance of his deposition (3.6).	5.00	3,900.00
10/21/25	Abigail Wissel	Research case law regarding the scope of considerations available in approving a settlement plan (2.4); summarize same for K. Kansa (.9).	3.30	1,237.50
10/21/25	Elisabeth Carpenter	Preparation for deposition of Cameron Blackmon including analysis of documents with exhibit index.	4.10	1,230.00
10/21/25	Elisabeth Carpenter	Analyze batched documents to identify relevant issues, privileged communications, issues, hot documents, and documents relating to Cameron Blackmon to assist with deposition preparation and strategy.	0.90	270.00
10/21/25	Kathleen A. Murphy	Review and organize documents to be used in preparing for depositions.	1.40	441.00
10/21/25	Mariah A. Whitner	Review documents in preparation for production.	3.30	1,947.00
10/21/25	Janelle Peters	Create various QC searches for production	7.00	1,855.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(1.0); run privilege term search (.5); provide case team with search requests (4.0); create production PROD004 for case team (1.5).		
10/21/25	Ning He	Revise motion to seal (2.2); analyze documents regarding Whinstone trial (3.5).	5.70	4,389.00
10/21/25	Trace (Vincent P.) Schmeltz	Conduct deposition preparation session for Chase Blackmon with K. Matsoukas and K. Warren.	3.60	3,600.00
10/22/25	Leah O'Farrell	Email to Clerk regarding K. Warren pro hac and message to K. Warren regarding form (.1); call with J. Kipp regarding 30(b)(6) research (.1); communications with K. Kansa regarding voting and solicitation and email to J. Miller regarding same (.2); communication with K. Kansa regarding scheduling and potential objections to confirmation and confirmation brief (.1).	0.50	295.00
10/22/25	Leah O'Farrell	Attention to emails regarding solicitation and opt-out form.	0.10	59.00
10/22/25	Leah O'Farrell	Call with J. Miller regarding opt-out notice (.1); calls with R. Izakelian regarding opt-out notice (.1); edit opt-out notice per calls and email to solicitation team regarding same (.2).	0.40	236.00
10/22/25	Leah O'Farrell	Attention to emails regarding 30(b)(6) protective order and review of instructions and notes regarding same (.2); communication with J. Kipp regarding same (.1).	0.30	177.00
10/22/25	Leah O'Farrell	Call with N. He regarding motion for protective order and motion to seal proceeding (.1); follow up regarding status of pro hac vices (.1); call with P. Lohse regarding staffing on motion for protective order and motion to compel (.1).	0.30	177.00
10/22/25	Leah O'Farrell	Attention to issues with pro hacs for P. Lohse, K. Matuskas, and K. Warren (.2); perform high level review of motion to seal hearing and send N. He comments regarding same (.2).	0.40	236.00
10/22/25	Leah O'Farrell	Communications with N. He regarding motion to seal hearing.	0.20	118.00
10/22/25	Leah O'Farrell	Begin working on motion for protective order regarding 30(b)(6) notice.	0.20	118.00
10/22/25	Anita Peterson	Preparation for and attend deposition of Chase	12.10	4,477.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Blackmon per request of T. Schmeltz including conferences with T. Schmeltz, K. Warren, Chase Blackmon, R. Mates (8.0); review communications regarding 2025-11-03 hearing (.2); assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-11-03 hearing including logistics (.4); preparation for upcoming deposition of J. Cohn (.4); review communications regarding deposition of J. Cohn (.2); communications with C. Topping regarding deposition of Chase Blackmon (.3); review communications regarding deposition of Cameron Blackmon (.2); review communications regarding 30(b)(6) depositions (.3); preparation for 30(b)(6) depositions (.4); assist attorneys in executing strategy per request of P. Lohse focusing on pro hac vice applications for P. Lohse, K. Matsoukas, K. Warren (.4); preparation for upcoming deposition of K. Hays (.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 K. Kansa and L. Parks regarding 4th interim fee statement (.2); review communications with Cameron Blackmon regarding cancellation of deposition (.1); review communications with C. Topping regarding deposition of K. Hays and assist attorneys in executing strategy per request of P, Lohse (.2).		
10/22/25	Joseph Kipp	Confer with L. O'Farrell regarding 30(b)(6) corporate representative caselaw research.	0.10	43.00
10/22/25	Joseph Kipp	Research FRCP 30(b)(6) case law.	3.50	1,505.00
10/22/25	Joseph Kipp	Prepare memo on witness testimony.	0.90	387.00
10/22/25	Joseph Kipp	Draft Special Committee's Motion to Compel LKC's Responses to Discovery Requests.	3.40	1,462.00
10/22/25	Scott Pelozza	Draft deposition preparation outline for deposition of Cameron Blackmon including review and analyze related documents.	5.60	3,584.00
10/22/25	Paige Lohse	Preparations for hearing on LKC dispute (1.6); LKC discovery and document responses (3.9); call with L. O'Farrell regarding motions (.1);	8.90	5,696.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		analyze and send correspondence and filings regarding recent developments (3.3).		
10/22/25	Kenneth Kansa	Communications with P. Lohse and L. O'Farrell on LKC discovery (.1); t/c S. Schultz on employee schedules (.3); review and propose revisions to employee schedules (.5); email L. Weber on same (.1); email to K. Matsoukas on order regarding LKC payment (.1); review and revise Fourth Interim Fee Application (.8); email to L. Parks on same (.1); review emails on solicitation distribution (.2); review LKC discovery emails (.2).	2.40	2,568.00
10/22/25	Charlotte Underwood	Preparations and management of 30(b)(6) depositions (2.6); communications with T. Schmeltz regarding outstanding items (.3); attention to insurer request regarding reimbursement (.1); coordinate calls with client and stakeholders (.1).	3.10	2,945.00
10/22/25	Megha Mathur	Identify documents related to Engagement Letter negotiations in preparation for J. Cohn deposition.	5.70	2,736.00
10/22/25	Megha Mathur	Identify documents in preparation for J. Cohn deposition.	2.10	1,008.00
10/22/25	Lydia Parks	Identify documents to use during Chase Blackmon's deposition (.2); identify and gather key documents for deposition preparation for Cameron Blackmon (.7).	0.90	387.00
10/22/25	Anna Bninski	Review team correspondence for information to incorporate into case indices.	0.20	90.00
10/22/25	Haley Casper	Communications with P. Lohse and K. Warren regarding 30(b)(6) deposition preparation and strategy (.5); prepare for deposition and prepare outline for K. Hays (6.1); review documents and evaluate updates from depositions in furtherance of same (8.0).	14.60	7,665.00
10/22/25	Charity Seaborn	Continue quality control review of document in preparation for rolling production.	0.50	240.00
10/22/25	Addison Smith	Review documents for J. Cohn deposition preparation.	0.50	295.00
10/22/25	Kevin Warren	Assist T. Schmeltz in defense of Chase	11.50	4,945.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Blackmon in deposition (8.0); related preparation of exhibits for redirect and draft of summary to prepare approach to upcoming depositions in LKC dispute to prepare for hearing on the same (3.5).		
10/22/25	Trace (Vincent P.) Schmeltz	Confer with C. Topping (.4); confer with D. Eaton regarding strategy (.3); confer with M. Robinson regarding matter administration (.1); consider strategy for LKC litigation (.8); produce Chase Blackmon for deposition (8.0) and post-deposition debrief (.6).	10.20	10,200.00
10/22/25	Carrie M. Raver	Address insurers' reimbursement issues.	0.30	253.50
10/22/25	Carrie M. Raver	Confirm points on mediation statement.	0.50	422.50
10/22/25	Carrie M. Raver	Evaluate XL's position letter on derivative investigation costs and corresponded with C. Topping regarding the same.	0.20	169.00
10/22/25	Kathleen L. Matsoukas	Work on outline for meeting with K. Hays to prepare for deposition (1.4); review related documents including set of settlement estimates (2.3); debrief on C. Blackmon deposition and use of documents that were not produced (.8); work on Transcend discovery and research on discovery issues (1.6).	6.10	4,758.00
10/22/25	Janelle Peters	Run various searches for key documents (1.0); run production QC searches for case team (1.0); create production view for case team to approve (1.0).	3.00	795.00
10/22/25	Mariah A. Whitner	Commence drafting Motion to Compel.	1.40	826.00
10/22/25	Ning He	Communications with team regarding 30(b)(6) topics (1.0); analyze documents regarding LKC engagement (1.7); call with L. O'Farrell regarding motion for protective order and motion to seal proceeding (.1).	2.80	2,156.00
10/23/25	Joseph Kipp	Research 5th Circuit caselaw analyzing FRCP 26 and 27 and granting motions to compel production of documents describing damages calculations.	2.20	946.00
10/23/25	Joseph Kipp	Analyze transcript of J. Cohn's deposition of C. Blackmon and extract key facts to be used in	0.90	387.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		the motion to compel.		
10/23/25	Joseph Kipp	Research 5th Circuit caselaw striking Rule 30(b)(6) deposition topics.	0.30	129.00
10/23/25	Joseph Kipp	Research Fifth Circuit caselaw assessing when it is proper to compel responses to discovery requests.	0.50	215.00
10/23/25	Joseph Kipp	Draft Proposed Order granting Special Committee's Emergency Motion for a Protective Order.	0.60	258.00
10/23/25	Joseph Kipp	Draft Special Committee's Motion to Compel LKC's Responses to Discovery Requests.	1.00	430.00
10/23/25	Joseph Kipp	Analyze exhibits used by J. Cohn in his deposition of C. Blackmon and extract key facts to be used in the motion to compel LKC's responses to discovery requests.	2.20	946.00
10/23/25	Joseph Kipp	Confer with M. Whitner regarding Motion to Compel analysis and research.	0.20	86.00
10/23/25	Joseph Kipp	Revise and incorporate feedback for Special Committee's Motion to Compel.	0.20	86.00
10/23/25	Aaron Gavant	Review, provide comments on and revise draft discovery motions (1.5); communications with BT team regarding same (.7).	2.20	1,771.00
10/23/25	Leah O'Farrell	Finalize drafting motion for protective order regarding 30(b)(6) notice.	2.00	1,180.00
10/23/25	Leah O'Farrell	Review LKC's edits to order on \$765k payment (.1); review status of pro hacs (.1).	0.20	118.00
10/23/25	Leah O'Farrell	Review and provide edits to order on motion for protective order regarding 30(b)(6) notice.	0.30	177.00
10/23/25	Leah O'Farrell	Email to BT team regarding edits on LKC order (.1); attention to emails regarding motion to seal and review remote protocols regarding same, email to BT team regarding same and communication with N. He to confirm (.3).	0.40	236.00
10/23/25	Anita Peterson	Review incoming 2025-10-22 Chase Blackmon rough draft transcript and assist attorneys in executing strategy per request of T. Schmeltz (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms	5.90	2,183.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		for attorney use (.4); preparation for deposition of K. Hays (1.4); communications with P. Lohse and H. Hinton regarding same (.2); preparation for 30(b)(6) depositions including logistics (.4); review communications with Porter Hedges regarding same (.2); review communications with witnesses regarding same (.3); communications with C. Underwood regarding same (.3); precise tracking and timely updates of deadlines and filings (.3); communications with C. Topping forwarding 2025-10-22 Chase Blackmon rough draft transcript (.2); review communication with Porter Hedges regarding deposition of K. Hays (.1); review communications with C. Topping regarding schedule for depositions (.3); review communications with LKC, Porter Hedges regarding supplemental production of documents (.2); review communication with Akin regarding supplemental production of documents (.2); communication with court reporter regarding her questions relating to 2025-10-22 Chase Blackmon deposition (.2); review communications with Porter Hedges regarding deposition of J. Cohn (.2); review communication with C. Topping regarding deposition preparation (.2); review communications with A. Popescu regarding update (.2); review communications with K. Kansa and L. Parks regarding 4th interim fee statement (.2); review incoming 2025-10-23 (Dkt 1865) Transcend's Objection to Quinn Emanuel's Third Interim Fee Application (.2).		
10/23/25	Leah O'Farrell	Draft notice of service regarding LKC's 2nd RFPs and email to P. Lohse regarding same.	0.40	236.00
10/23/25	Kenneth Kansa	Participate in team call with Quinn Emanuel team and Province (.5); email to S. Schultz on severance exhibit (.1); email to J. Wolfshohl on LKC payment order (.1); review J. Wolfshohl comments on order (.1); emails to L. Parks on Interim Fee Application (.2).	1.00	1,070.00
10/23/25	Paige Lohse	Preparations for hearing on LKC dispute (3.2); confer with K. Warren regarding deposition	11.70	7,488.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		strategy (.7); review and prepare LKC discovery and document responses (4.5); LKC conferrals (.2); analyze and send correspondence and filings regarding recent developments (1.9); confer with K. Murphy regarding deposition exhibits (.3); confer with C. Underwood regarding deposition preparation and discovery (.7); call with H. Casper regarding supplemental production of documents and strategy for depositions (.2).		
10/23/25	Melissa Bonnici	Review documents pertaining to Section 2.3/PSA agreement and compile chronology of documents.	2.60	1,118.00
10/23/25	Charlotte Underwood	Participate in deposition preparation with K. Hays (1.2); manage preparation and coordination for 30b6 depositions (3.3); confer with P. Lohse regarding discovery and deposition preparation (.7); call with T. Schmeltz on outstanding items (.5); call with T. Schmeltz and K. Warren regarding next steps in LKC litigation (.3).	6.00	5,700.00
10/23/25	Megha Mathur	Identify documents related to Engagement Letter negotiations and success fee for 30(b)(6) depositions.	3.50	1,680.00
10/23/25	Megha Mathur	Draft preparation questions for Engagement Letter and success fee topics for 30(b)(6) depositions.	1.40	672.00
10/23/25	Lydia Parks	Incorporate K. Kansa's edits and revise the Fourth Interim Fee Application and Certification.	1.70	731.00
10/23/25	Haley Casper	Prepare for K. Hays deposition and prepare key documents and materials in furtherance of same (1.5); prepare for and attend call regarding 30(b)(6) deposition preparation and strategy (1.1); continue preparation for depositions and 30(b)(6) depositions including simultaneously coordinating and running supplemental document productions (3.7); prepare for and meet with K. Hays in furtherance of deposition preparation (4.8); supplement notations and continue preparation for upcoming depositions and development of facts (1.4); prepare for and attend call regarding	13.90	7,297.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		exit financing; review documents and information in furtherance of same (1.2); call with P. Lohse regarding supplemental production of documents and strategy for depositions (.2).		
10/23/25	Anna Brinski	Review internal and external correspondence regarding current deposition and discovery developments (.2); edit case indices to reflect same (.3); correspond with P. Lohse regarding deposition transcript (.1).	0.60	270.00
10/23/25	Megha Mathur	Analyze correspondence regarding recent developments.	1.00	480.00
10/23/25	Addison Smith	Review documents for J. Cohn deposition preparation.	5.80	3,422.00
10/23/25	Carrie M. Raver	Address wire instruction issues related to derivative investigation costs reimbursement.	0.40	338.00
10/23/25	Kevin Warren	Prepare pro hac application to prepare for LKC fee application hearing.	0.80	344.00
10/23/25	Kevin Warren	Strategize approach to upcoming depositions with P. Lohse to prepare for LKC fee application hearing.	0.70	301.00
10/23/25	Kevin Warren	Coordinate preparation of exhibit uploads for J. Cohn deposition to prepare for LKC fee application hearing.	0.80	344.00
10/23/25	Kevin Warren	Review documents and correspondence subject to supplemental production to assist P. Lohse in producing the same to prepare for LKC fee application hearing.	0.90	387.00
10/23/25	Kevin Warren	Strategize approach to hearing and outstanding to-do items to prepare for same with P. Lohse.	0.80	344.00
10/23/25	Kevin Warren	Evaluate documents to review to support K. Hays deposition and deposition of J. Cohn to prepare for hearing on LKC fee application.	1.30	559.00
10/23/25	Kevin Warren	Review database to determine key documents related to K. Hays and J. Cohn to support depositions of both to support T. Schmeltz and team to prepare for hearing on LKC fee application hearing (4.4); call with T. Schmeltz and C. Underwood regarding next steps in LKC litigation (.3).	4.70	2,021.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/23/25	Trace (Vincent P.) Schmeltz	Call with C. Underwood regarding matter strategy and administration (.5); call regarding 30(b)(6) witnesses (.3); call with C. Underwood and K. Warren regarding next steps in LKC litigation (.3); prepare K. Hays for deposition (2.6); work on various emails and briefs related to LKC (3.6).	7.30	7,300.00
10/23/25	Abigail Wissel	Revisions to Fourth Interim Fee Application (.7); email to L. Parks on same (.1).	0.80	300.00
10/23/25	Abigail Wissel	Review time entries for Fourth Interim Fee Application (.9); email to L. Parks on same (.1).	1.00	375.00
10/23/25	Kathleen A. Murphy	Review and index deposition exhibits marked at the deposition of Chase Blackmon (1.6); conference with P. Lohse regarding same (.3).	1.90	598.50
10/23/25	Janelle Peters	Run QC Searches and generate PROD005 for case team.	1.00	265.00
10/23/25	Mariah A. Whitner	Confer with J. Kipp regarding Motion to Compel (.2); finalize additional edits to Motion to Compel (.8).	1.00	590.00
10/23/25	Kathleen L. Matsoukas	Prepare for and lead preparation work with K. Hays (5.4); multiple communications with team regarding collecting and reviewing evidence for deposition preparation (2.5).	7.90	6,162.00
10/23/25	Ning He	Analyze documents regarding LKC engagement and success fee (3.5); analyze deposition transcript of Chase Blackmon (1.5).	5.00	3,850.00
10/24/25	Joseph Kipp	Revise and incorporate feedback for Special Committee's Motion to Compel.	0.50	215.00
10/24/25	Joseph Kipp	Confer with P. Lohse regarding 30(b)(6) witness preparation.	0.90	387.00
10/24/25	Joseph Kipp	Analyze October 15 hearing transcript and extract key facts and quotations.	0.40	172.00
10/24/25	Joseph Kipp	Confer with K. Warren regarding 30(b)(6) witness preparation.	0.20	86.00
10/24/25	Joseph Kipp	Review relevant selected documents from Everlaw database and upload into witness preparation folder.	1.00	430.00
10/24/25	Joseph Kipp	Review drafts and revisions of PSA and incorporate key provisions into chart for P.	2.60	1,118.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Lohse and K. Warren's review.		
10/24/25	Paige Lohse	Preparations for hearing on LKC dispute (5.4); confer with J. Kipp regarding 30(b)(6) witness preparation (.9); address LKC discovery and document responses (4.4); confer with C. Underwood regarding LKC projects (.4); participate in LKC conferrals (.1); preparations for hearing on Transcend dispute (.2); analyze and send correspondence and filings regarding recent developments (1.4); call with H. Casper regarding strategy for upcoming depositions (1.0).	13.80	8,832.00
10/24/25	Charlotte Underwood	Confer with client and Province regarding LKC (.5); confer with SAFE AHG regarding LKC (.5); support to deposition and team handling LKC dispute (.7); correspond with D. Eaton regarding Akin invoices (.2); confer with P. Lohse regarding LKC outstanding projects (.4); coordinate 30(b)(6) depositions (.3).	2.60	2,470.00
10/24/25	Megha Mathur	Draft preparation questions for Engagement Letter and success fee topics for 30(b)(6) depositions.	0.50	240.00
10/24/25	Megha Mathur	Identify documents related to Engagement Letter negotiations and success fee for 30(b)(6) depositions.	5.00	2,400.00
10/24/25	Anna Brinski	Update case management indices.	0.20	90.00
10/24/25	Anita Peterson	Preparation for deposition of K. Hays (1.0); assist attorneys regarding deposition of K. Hays per request or T. Schmeltz (.8); preparation for deposition of J. Cohn (.3); preparation for 30(b)(6) depositions (.4); review multiple communications with LKC regarding depositions, request for meet and confer, witnesses and assist attorneys in executing strategy per request of P. Lohse (.3); communications with P. Lohse regarding deposition preparation (.2); communication with C. Underwood regarding deposition preparation (.3); review incoming Chase Blackmon deposition transcript and exhibits and assist attorneys in executing strategy per request of P. Lohse (.3); precise tracking and timely updates	6.80	2,516.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		of deadlines and filings (.4); review multiple communications with C. Topping regarding deposition preparation (.4); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.4); communication with R. Mates regarding deposition of K. Hays (.2); communications with LKC regarding deposition of K. Hays (.2); review communications with LKC, Porter Hedges regarding supplemental document production (.3); review communications with Akin regarding supplemental document production (.3); communications with investigative team regarding valuation (.2); review communications with C. Potter regarding remand hearing (.1); review communications with Akin regarding LKC (.2); review communications with Akin regarding redacted invoices (.2); review communication with local counsel forwarding 2025-09-08 Transcript of Status Conference, 2025-10-02 Transcript of Status Conference, 2025-10-15 Transcript of Emergency Hearing regarding Disclosure Statement and Emergency Motions and assist attorneys in executing strategy per request of P. Lohse (.2); communication with investigative team regarding solicitation packages, deadlines (.1).		
10/24/25	Melissa Bonnici	Review documents at the request of P. Lohse, including compiling draft chronology of documents relevant to PSA and Section 2.3 specifically.	3.70	1,591.00
10/24/25	Haley Casper	Work on discovery issues including prepare for K. Hays deposition, prepare and coordinate supplemental document production and prepare potential exhibits and coordinate internally in furtherance of same (5.5); prepare witness and attend and assist in deposition of K. Hays (6.6); evaluate documents and communicate internally regarding deposition takeaways and next steps in furtherance of upcoming depositions (.6); call with P. Lohse regarding strategy and preparation for upcoming	13.70	7,192.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		depositions (1.0).		
10/24/25	Carrie M. Raver	Address reimbursement issues.	0.40	338.00
10/24/25	Kevin Warren	Coordinate supplemental production to assist P. Lohse in responding to LKC requests to prepare for fee application hearing.	2.30	989.00
10/24/25	Kevin Warren	Coordinate production relating to potential financing partners with A. Smith to assist P. Lohse in responding to LKC requests in advance of fee application hearing.	1.20	516.00
10/24/25	Kevin Warren	Evaluate documents to consider with respect to J. Cohn deposition, with related coordination of review to compile relevant documents to M. Whitner, M. Mathur, A. Smith, and J. Kipp to prepare for deposition of J. Cohn in advance of LKC fee application hearing (4.5); confer with J. Kipp regarding 30(b)(6) preparation (.2).	4.70	2,021.00
10/24/25	Trace (Vincent P.) Schmeltz	Work with 30(b)(6) witnesses (1.2); prepare C. Topping for deposition (1.3); produce K. Hays for deposition (6.6); attend to LKC strategy (.4).	9.50	9,500.00
10/24/25	Glenn R. de Roziere	Conduct research at request of K. Warren.	1.20	462.00
10/24/25	Kenneth Kansa	Email to C. Underwood on severance exhibit (.1); email to BT team on solicitation packages (.1).	0.20	214.00
10/24/25	Ning He	Prepare and analyze documents related to Topic 1 of 30(b)(6) issues in LKC dispute.	8.80	6,776.00
10/24/25	Janelle Peters	Create searches of potential production documents for case team(1.4); run production PROD006 for case team (.1).	1.50	397.50
10/24/25	Kathleen L. Matsoukas	Continue preparation of K. Hays for deposition (2.5); review evidence for J. Cohn deposition and compiled notes for questions and topics (3.3); communicate with team regarding analysis of original and revised engagement letters and other LKC matters for deposition preparation (.7).	6.50	5,070.00
10/25/25	Joseph Kipp	Review Rhodium communications discussing purchase price allocation and incorporate into chart for N. He and K. Warren's review.	1.30	559.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/25/25	Charlotte Underwood	Communications with team regarding deposition and trial preparations (1.1); related follow up (.3); confer with T. Schmeltz regarding deposition preparations and open items (.3).	1.70	1,615.00
10/25/25	Joseph Kipp	Revise chart of Rhodium PSA communications and send to N. He to assist in deposition preparation for C. Topping.	0.90	387.00
10/25/25	Anita Peterson	Review communications with LKC regarding 30(b)(6) depositions, deposition of J. Cohn, witnesses, declarations (.3); review communications with C. Wheeler regarding deposition preparation (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	0.70	259.00
10/25/25	Paige Lohse	Preparations for hearing on LKC dispute (2.4); address LKC discovery and document responses (.5); confer with T. Schmeltz regarding discovery (.9); call regarding 30(b)(6) topics (1.2); revise motions and submissions relating to LKC (2.7).	7.70	4,928.00
10/25/25	Haley Casper	Call regarding 30(b)(6) deposition preparation, motion strategy, and next steps.	1.20	630.00
10/25/25	Haley Casper	Prepare for C. Wheeler deposition, including simultaneously review documents, prepare outline, and communicate internally and with client regarding same.	5.30	2,782.50
10/25/25	Megha Mathur	Analyze correspondence regarding recent developments.	1.00	480.00
10/25/25	Addison Smith	Review documents for J. Cohn deposition preparation.	1.60	944.00
10/25/25	Addison Smith	Review and redact documents and emails concerning Province funding efforts.	1.70	1,003.00
10/25/25	Kevin Warren	Coordinate preparation of production with respect to communications concerning original LKC engagement letter to prepare for 30(b)(6) deposition in furtherance of preparing for LKC fee application hearing.	1.20	516.00
10/25/25	Kevin Warren	Continue to prepare for LKC fee application hearing.	0.80	344.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/25/25	Kevin Warren	Evaluate communications concerning the allocation determination of the PSA to assist N. He in preparation of Topic 4 of 30(b)(6) notice to support preparation for hearing on LKC fee application.	1.70	731.00
10/25/25	Kevin Warren	Review Chase Blackmon deposition transcript to prepare to designate the same as to certain 30(b)(6) topics to prepare for hearing on LKC fee application (2.5); call regarding 30(b)(6) topics (1.2)..	3.70	1,591.00
10/25/25	Trace (Vincent P.) Schmeltz	Confer with P. Lohse regarding discovery (.9); confer with C. Underwood regarding deposition preparation and open items (.3); confer with N. He regarding LKC negotiation (.5); interview C. Topping (.7); confer with J. Stokes regarding C. Topping's prior testimony (.7).	3.10	3,100.00
10/25/25	Glenn R. de Roziere	Review open source materials for investigation.	1.50	577.50
10/25/25	Kenneth Kansa	Review emails on LKC proposed order (.2); emails to P. Lohse on same (.2); review S. Schultz email on severance exhibit (.1).	0.50	535.00
10/25/25	Ning He	Prepare and analyze materials regarding topics 1 and 2 of 30(b)(6) notices (8.8); draft preparation questions regarding 30(b)(6) questions (4.4); confer with T. Schmeltz and C. Topping regarding LKC negotiation (.5); call with team regarding 30(b)(6) topics (1.2).	14.90	11,473.00
10/25/25	Kathleen A. Murphy	Review, organize and format documents to be used as deposition exhibits.	2.70	850.50
10/25/25	Kathleen L. Matsoukas	Review open discovery action items with team (.5); work on deposition preparation for J. Cohn (2.0); review results of K. Hays deposition (.3).	2.80	2,184.00
10/26/25	Joseph Kipp	Locate ECF numbers on Courtlink to be introduced into motion draft for P. Lohse.	0.50	215.00
10/26/25	Paige Lohse	Preparations for hearing on LKC dispute (2.4); LKC deposition conferrals (1.2); revise motions and submissions relating to LKC (4.9); preparations for plan confirmation discovery (.2); call with H. Casper regarding C. Wheeler deposition preparation (.2); preparations for hearing on Transcend dispute (.2); analyze and	13.60	8,704.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		send correspondence and filings regarding recent developments (3.8); confer with T. Schmeltz and N. He regarding damage analysis (.7).		
10/26/25	Joseph Kipp	Review Everlaw documents regarding J. Cohn communications and classify for J. Cohn deposition preparation.	2.00	860.00
10/26/25	Joseph Kipp	Analyze Rhodium board minutes and extract key information for N. He's review.	1.10	473.00
10/26/25	Anita Peterson	Review communications with C. Potter regarding topics for corporate representative depositions (.2); review communications with M. Robinson, D. Dunn, D. Eaton, S. Wells regarding same (.1); review communications with D. Eaton, S. Wells, D. Dunn, M. Robinson regarding LKC issues (.2); review communications with D. Eaton regarding deposition, deposition preparation (.4); review communications with C. Topping regarding depositions, deposition preparation (.2); review communications with LKC regarding coordinating depositions and assist attorneys in executing strategy per request of P. Lohse (.3); review communications with Akin regarding depositions (.2); review communications with Porter Hedges regarding depositions (.2); review communications with C. Wheeler regarding deposition, deposition preparation (.2); review communications with Quinn Emanuel regarding Motion to Enforce (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.2).	2.40	888.00
10/26/25	Charlotte Underwood	Attention to ongoing discovery and briefing efforts related to LKC dispute and plan confirmation (2.9); communications with T. Schmeltz regarding the same (.5); coordinate depositions and related preparations (.3); confer with client and SAFE AHG regarding upcoming hearing (.8); related follow up (.9).	5.40	5,130.00
10/26/25	Kathleen L.	Review potential exhibits for J. Cohn deposition	7.40	5,772.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
	Matsoukas	(2.5); draft J. Cohn deposition outline (3.8); communicate with team regarding questions for J. Cohn deposition (1.1).		
10/26/25	Kenneth Kansa	Review detail for September monthly application (.7); email to A. Peterson on same (.1); review LKC emails (.1); review deposition topics from C. Potter (.2); review LKC discovery-related emails (.3).	1.40	1,498.00
10/26/25	Haley Casper	Prepare for C. Wheeler deposition and assist in preparation for J. Cohn deposition (2.8); call with P. Lohse regarding C. Wheeler preparation (.2); evaluate K. Hays deposition transcript and prepare analysis regarding 30(b)(6) implications and future deposition preparation (1.6); participate in call with C. Wheeler in furtherance of deposition preparation (1.5); continue preparation of materials and exhibits in furtherance of upcoming depositions (1.8).	7.90	4,147.50
10/26/25	Addison Smith	Review and redact documents and emails concerning Province funding efforts.	1.10	649.00
10/26/25	Kevin Warren	Evaluate board minutes summary analysis of J. Kipp with N. He to prepare for J. Cohn deposition and to determine relevance to LKC dispute to prepare for hearing on fee application.	0.80	344.00
10/26/25	Kevin Warren	Evaluate prior negotiations with LKC for P. Lohse to assist T. Schmeltz in preparing for upcoming depositions and LKC fee application hearing.	0.90	387.00
10/26/25	Kevin Warren	Evaluate revised fee arrangement negotiations with LKC to assess implications of revised compared to prior fee arrangement to assist K. Matsoukas, P. Lohse, and T. Schmeltz to prepare for hearing on LKC fee application.	1.10	473.00
10/26/25	Kevin Warren	Draft initial designation of Chase Blackmon testimony that relates to 30(b)(6) topics for N. He review to prepare for corporate representative depositions to prepare for LKC fee application hearing.	4.40	1,892.00
10/26/25	Kevin Warren	Draft questions, with related identification of relevant documents, to prepare corporate	2.90	1,247.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		representatives for topic 4 of 30(b)(6) notice to assist T. Schmeltz and N. He to prepare for LKC fee application hearing.		
10/26/25	Trace (Vincent P.) Schmeltz	Review documents (2.3); confer with M. Hurley regarding strategy (.6); calls with D. Eaton, S. Wells, and M. Robinson (1.1); calls with N. He and P. Lohse regarding damage analysis (.7); work on all aspects of deposition preparation with C. Topping, D. Eaton and C. Wheeler (4.1); confer with SAFE AHG regarding C. Topping's prior testimony (.9).	9.70	9,700.00
10/26/25	Ning He	Confer with T. Schmeltz and P. Lohse regarding damage analysis (.7); confer with BDO regarding damage analysis (.5); analyze documents regarding damage analysis (5.6); analyze documents regarding topics (3) and (4) of LKC 30b6 (5.5); prepare C. Topping for deposition (3.5).	15.80	12,166.00
10/26/25	Kathleen A. Murphy	Update deposition exhibit index.	0.50	157.50
10/26/25	Janelle Peters	Create searches for case team and confirm whether documents have been previously produced (.3); upload new document sets to database and QC uploads (.3).	0.60	159.00
10/27/25	Joseph Kipp	Analyze filings in Courtlink and extract key information to be used in the Special Committee's Motion for Authority to Pay Fees.	0.80	344.00
10/27/25	Joseph Kipp	Analyze Chase Blackmon deposition transcript and extract key sections highlighted by K. Warren.	2.00	860.00
10/27/25	Joseph Kipp	Analyze Chase Blackmon deposition transcript and extract key sections highlighted by K. Warren.	1.60	688.00
10/27/25	Joseph Kipp	Convert extracted key sections from Chase Blackmon deposition transcript into succinct outline format for K. Warren's review.	3.80	1,634.00
10/27/25	Joseph Kipp	Review direct examination outlines for Chase Blackmon testimony.	0.20	86.00
10/27/25	Kathleen L. Matsoukas	Continue drafting and revising outline for deposition of J. Cohn, with related review of	5.20	4,056.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		documents/exhibits (3.4); call with K. Kansa regarding Transcend 30(b)(6) topics (.7); prepare for and participate in review of and strategy for response Rule 30(b)(6) topics from Transcend (1.1).		
10/27/25	Leah O'Farrell	Attention to email regarding filing proposed order and message P. Lohse regarding notice.	0.10	59.00
10/27/25	Leah O'Farrell	Revise notice of proposed order and reviewing emails regarding same to add to notice.	0.20	118.00
10/27/25	Leah O'Farrell	Attention to emails regarding witness and exhibit list filing needed (.1); attention to email from P. Lohse regarding edits to notice of proposed order and make revisions regarding same (.2).	0.30	177.00
10/27/25	Leah O'Farrell	Attention to emails regarding call on plan discovery conferral (.1); attention to emails regarding LKC depositions to prepare exhibit/witness list (.3); review court and judge's procedures regarding evidentiary hearings and email BT team regarding same (.4); begin draft outline for witness/exhibit list (.5).	1.30	767.00
10/27/25	Leah O'Farrell	Review requested 30(b)(6) topics for plan discovery (.4); communication with K. Matsoukas and K. Kansa regarding plan discovery (.6).	1.00	590.00
10/27/25	Leah O'Farrell	Communications with P. Lohse and Clerk regarding filing of emergency motion for protective order.	0.10	59.00
10/27/25	Leah O'Farrell	Begin reviewing motion to remand to prepare for hearing on motion to remand.	2.40	1,416.00
10/27/25	Leah O'Farrell	Review motion to seal hearing and provide revisions per plan to request hearing on logistics.	0.20	118.00
10/27/25	Leah O'Farrell	Communications with P. Lohse regarding motion to remand and discussion regarding motion to seal.	0.30	177.00
10/27/25	Leah O'Farrell	Continue reviewing motion to remand and research regarding same for hearing on motion to remand.	1.00	590.00
10/27/25	Aaron Gavant	Review various developments relating to plan	0.80	644.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/27/25	Anita Peterson	<p>confirmation hearings and LKC dispute (.4); communications with BT team regarding same and next steps (.4).</p> <p>Review exhibits marked internally at deposition of K. Hays and assist attorneys in executing strategy per request of T. Schmeltz (.2); preparation for and assist regarding upcoming depositions (1.9); communications with P. Lohse regarding same (.2); communications with C. Underwood regarding same (.2); review communications with Akin regarding depositions (.2); review communications with D. Eaton regarding deposition, deposition preparation and assist attorneys in executing strategy per request of C. Underwood (.3); review communications with C. Topping regarding depositions (.2); review communications from Porter Hedges regarding updated 30(B)(6) deposition notices (.2); precise tracking and timely updates of deadlines and filings (.5); review communication with Stris regarding status of deposition of J. Stokes and assist attorneys in executing strategy per request of C. Underwood (.2); review multiple communications with LKC regarding depositions and follow up regarding same (.3); communications regarding monthly fee statement (.2); review and revise monthly fee application (.7); review communication with A. Popescu regarding deposition preparation (.1); review communication regarding SAFE AHG's production to LKC and the Transcend Group (.2); review incoming transcripts and exhibits from 2025-10-24 deposition of K. Hays and assist attorneys in executing strategy per request of T. Schmeltz (.4); review incoming updated transcripts from 2025-10-22 deposition of Chase Blackmon and assist attorneys in executing strategy per request of T. Schmeltz (.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 investigative team regarding Building D term</p>	7.40	2,738.00

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Date	Name	Description	Hours	Amount
		sheet (.2); review communications with LKC and Porter Hedges regarding supplemental production of documents (.2); review communications with Akin regarding supplemental production of documents (.2).		
10/27/25	Paige Lohse	Preparations for hearing on LKC dispute (3.7); address LKC discovery and document responses (.2); participate in LKC conferrals (.2); revise motions and submissions relating to LKC (5.2); preparations for plan confirmation discovery (.2); preparations for hearing on Transcend dispute (.3); analyze and send correspondence and filings regarding recent developments (1.0); call with T. Schmeltz regarding strategy (.2).	11.00	7,040.00
10/27/25	Charlotte Underwood	Confer with P. Lohse and N. He regarding trial exhibits and outlines (.8); deposition preparations (1.4).	2.20	2,090.00
10/27/25	Megha Mathur	Analyze correspondence regarding recent developments.	1.00	480.00
10/27/25	Carrie M. Raver	Address XL claim acknowledgment and denial and correspond with T. Schmeltz regarding the same.	0.20	169.00
10/27/25	Kevin Warren	Revise J. Cohn deposition outline with related supplements to exhibit binders to assist T. Schmeltz in preparing for J. Cohn deposition and to prepare for hearing on LKC fee application.	11.50	4,945.00
10/27/25	Kevin Warren	Assist T. Schmeltz with preparation of D. Eaton for deposition, with related review of documents regarding the same, to prepare for hearing on LKC fee application.	2.00	860.00
10/27/25	Trace (Vincent P.) Schmeltz	Prepare C. Topping for deposition (3.2); work on LKC brief (3.4); strategy calls with B. Riley (.4); M. Robinson (.4); P. Lohse (.2); and S. Schultz (.3). work with BDO on expert testimony (.6); prepare D. Eaton for deposition (2.0); confer with P. Tomasco regarding privilege issues (.4); address matter emails (.4).	11.30	11,300.00
10/27/25	Anna Bninski	Draft summary of fact and law regarding Special Committee's actions and position regarding	4.30	1,935.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		privilege waiver vis-a-vis production to LKC (3.9); confer with P. Lohse regarding same (.4).		
10/27/25	Haley Casper	Prepare for 30(b)(6) depositions including coordinate with team and produce supplemental documents in furtherance of same (4.8); analyze K. Hays deposition transcript and notate 30(b)(6) deposition testimony in furtherance of designation (.7).	5.50	2,887.50
10/27/25	Haley Casper	Preparation for hearing and trial exhibits and communications regarding same.	0.80	420.00
10/27/25	Kenneth Kansa	T/c S. Schultz on confirmation issues (.3); review severance exhibit in preparation for call (.2); conference with Quinn Emanuel and Akin teams on severance payments exhibit (.5); t/c K. Matsoukas on Transcend 30(b)(6) topics (.8); email T. Schmeltz regarding advance notice of filing to US Trustee (.1); email to N. He on LKC hearing (.1); review revised plan severance exhibit and S. Schultz edit on same (.1); email to Debtors and SAFE AHG on same (.1); review additional revisions to severance exhibit (.1).	2.30	2,461.00
10/27/25	Kathleen A. Murphy	Communications with J. Kipp and K. Warren regarding deposition outline information (.2); assist attorneys in executing strategy regarding hearing logistics per request of P. Lohse (.5).	0.70	220.50
10/27/25	Mariah A. Whitner	Review deposition outline for J. Cohn and corresponding exhibits ahead of deposition.	1.90	1,121.00
10/27/25	Janelle Peters	Create searches for case team.	0.80	212.00
10/27/25	Ning He	Revise motion to seal hearing (1.5); confer with BDO regarding analysis (1.0); confer with Province regarding damage calculation (.5); analyze documents regarding building D (4.2); analyze documents regarding litigation estimates (2.6); confer with C. Topping regarding deposition preparation (2.0).	11.80	9,086.00
10/28/25	Joseph Kipp	Convert extracted key sections from Chase Blackmon deposition transcript into succinct outline format for K. Warren's review.	2.60	1,118.00
10/28/25	Joseph Kipp	Draft letter to LKC and Porter Hedges objecting to 30(b)(6) deposition topics for P. Lohse's review.	1.80	774.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/28/25	Joseph Kipp	Draft exhibit cover sheets for motion to be filed by P. Lohse.	0.20	86.00
10/28/25	Lydia Parks	Review certain sections of power contracts ahead of the J. Cohn deposition (.6); review exhibits from the Chase Blackmon deposition and note particulars of interest (.6); review and revise the letter responding to the 30(b)(6) topics proposed (.8); review the final draft of the letter (.1).	2.10	903.00
10/28/25	Anita Peterson	Precise tracking and timely updates of deadlines and filings (.4); preparation for and assist with depositions (1.8); review and revise monthly fee statement (2.6); review as-filed 2025-10-27 (Dkt 1873) Notice of Filing of Proposed Order, 2025-10-27 (Dkt 1873-1) (proposed) Order regarding \$765,792.35 payment to LKC, 2025-10-27 (Dkt 1874) Emergency Motion of the Special Committee for Entry of a Protective Order, 2025-10-27 (Dkt 1874) Emergency Motion of the Special Committee for Entry of a Protective Order (with Exhibits A-C), 2025-10-27 (Dkt 1875) Notice of Service, 2025-10-27 (Dkt 1876) Special Committee's Emergency Motion to Seal the LKC Fee Hearing, 2025-10-27 (Dkt 1876-1) (proposed) Order Granting the Special Committee's Emergency Motion to Seal the Hearing on the Final Application for Compensation for LKC and assist attorneys in executing strategy per request of P. Lohse (.8); preparation for emergency hearings (.5); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.5); review communications with LKC regarding deposition scheduling, 30(b)(6) depositions (.4); communications with Company regarding J. Cohn deposition (.2); communications with C. Topping regarding deposition preparation (.4); communications with C. Underwood regarding deposition preparation (.4); review communications with C. Topping regarding deposition preparation (.4); review communications with Court regarding	10.00	3,700.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		hearing on emergency motion to seal (.2); review communications with Akin regarding draft brief (.1); review communications with P. Tomasco regarding 30(b)(6) depositions (.2); communication with investigative team regarding objections and talking points regarding Transcend Plan discovery (.2); review incoming 2025-10-28 (Dkt 1878) Memorandum Opinion and Order on Amended Omnibus Objection Rhodium (Midas Green) (.2); communications with investigative team regarding same (.1); communications with M. Dearman regarding 30(b)(6) depositions (.2); communications with Quinn Emanuel regarding monthly fee statement (.2); review communications with Quinn Emanuel regarding motion to enforce purchase and sale agreement (.2).		
10/28/25	Leah O'Farrell	Draft argument outline for motion to remand.	2.60	1,534.00
10/28/25	Leah O'Farrell	Review docket for hearing dates and times per request from P. Lohse (.1); email to A. Peterson regarding docketing of hearing dates (.1).	0.20	118.00
10/28/25	Leah O'Farrell	Continue researching for motion to remand hearing.	0.60	354.00
10/28/25	Leah O'Farrell	Review email from K. Matsoukas regarding topics for meet and confer on plan discovery (.1); attention to email from K. Kansa regarding plan discovery (.1).	0.20	118.00
10/28/25	Leah O'Farrell	Draft motion to seal exhibits to motion for authority to pay (1.0); attention to email to Clerk regarding motion to file under seal and confirm filing plan (.2).	1.20	708.00
10/28/25	Aaron Gavant	Review and consider impact of decision on Midas Green claims.	0.50	402.50
10/28/25	Charlotte Underwood	Review and designate deposition testimony (1.4); review and identify trial exhibits (1.2); prepare for upcoming depositions and hearings (2.4); communications with T. Schmeltz on open issues (.4).	5.40	5,130.00
10/28/25	Kenneth Kansa	Participate in update call with Province and Quinn Emanuel (.5); review Midas Green	1.10	1,177.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		opinion (.2); email to BT team on same (.1); email to S. Schultz on confirmation brief (.1); email to K. Matsoukas and L. O'Farrell on allocation of 30(b)(6) topics (.2).		
10/28/25	Paige Lohse	Preparations for hearing on LKC dispute (3.9); revise motion to compel (4.9); preparations for plan confirmation discovery (.2); preparations for hearing on Transcend dispute (.2); analyze and send correspondence and filings regarding recent developments (3.1); continue to prepare motion to enforce Purchase and Sale Agreement against Whinstone (1.1); revise and finalize motion for authority to pay LKC fees (2.1).	15.50	9,920.00
10/28/25	Kevin Warren	Preparation for and assist T. Schmeltz in deposition of J. Cohn to prepare for hearing on LKC fee application (9.6); follow up regarding same (.9).	10.50	4,515.00
10/28/25	Trace (Vincent P.) Schmeltz	Prepare for and take J. Cohn's deposition (9.6); address privilege clawback (.3).	9.90	9,900.00
10/28/25	Kathleen L. Matsoukas	Prepare for argument on Transcend's motion to remand and communicate with L. O'Farrell regarding same (1.4); communicate with team regarding J. Cohn deposition (.2).	1.60	1,248.00
10/28/25	Kathleen L. Matsoukas	Draft and revise chart of objections and responses to Transcend's Rule 30(b)(6) topics and communicate with team regarding same.	1.10	858.00
10/28/25	Anna Bninski	Formulate claw back by assessing and coding documents to reflect privilege (2.8); correspond with P. Lohse regarding same (.1).	2.90	1,305.00
10/28/25	Haley Casper	Communications with discovery team and with C. Underwood regarding preparation of K. Hays and C. Wheeler (.2); supplement review of K. Hays transcript in furtherance of designating for 30(b)(6) (1.5); analyze trial preparation materials and supplement exhibit list (.6); communicate internally regarding same (.2).	2.50	1,312.50
10/28/25	Haley Casper	Evaluate supporting documents and strategize in furtherance of Motion to Compel LKC's discovery.	0.50	262.50
10/28/25	Kathleen A.	Assist attorneys regarding logistics for 2025-11-	0.50	157.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
	Murphy	03 hearing per request of P. Lohse.		
10/28/25	Janelle Peters	Create searches for case team (.8); locate documents in Everlaw database for C. Underwood (.5); create production PROD009 for case team (.2); load documents into database for case team (.2).	1.70	450.50
10/28/25	Ning He	Confer with BDO regarding analysis (.5); confer with C. Topping regarding deposition (2.0); analyze documents regarding trial exhibits (3.5); analyze documents regarding settlement claims (2.5); analyze deposition transcript regarding 30(b)(6) topics (2.2).	10.70	8,239.00
10/29/25	Joseph Kipp	Review communications among the Special Committee, LKC, and Porter Hedges and compile for P. Lohse's review .	2.80	1,204.00
10/29/25	Joseph Kipp	Revise Motion to Compel LKC's Responses to Special Committee's Discovery Requests.	0.30	129.00
10/29/25	Joseph Kipp	Communication with P. Lohse regarding Motion to Compel.	0.10	43.00
10/29/25	Joseph Kipp	Summarize previously compiled emails with LKC and Porter Hedges and send to P. Lohse for review.	2.00	860.00
10/29/25	Joseph Kipp	Research TX caselaw on contract rescission.	2.10	903.00
10/29/25	Lydia Parks	Review and tag certain documents for LKC production (.8); identify and prepare trial exhibits and charts (5.3).	6.10	2,623.00
10/29/25	Kathleen L. Matsoukas	Call with K. Kansa regarding Plan objections (.2); communicate with team regarding exhibits to be designated for hearing exhibit list (.6); communicate with team regarding planning for upcoming Transcend motion to remand (.5); review and revise argument outline for hearing on motion to remand (.7); communicate with L. O'Farrell regarding same (.3).	2.30	1,794.00
10/29/25	Leah O'Farrell	Attention to emails regarding plan discovery and 30(b)(6) topics.	0.20	118.00
10/29/25	Leah O'Farrell	Communication with P. Lohse regarding exchange of exhibits (.1); draft proposed email for P. Lohse to review regarding agreement on exhibits (.1); communications with K. Matsoukas	0.40	236.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		regarding motion to remand (.2).		
10/29/25	Leah O'Farrell	Attention to redrafting exhibit agreement per instructions from P. Lohse.	0.20	118.00
10/29/25	Leah O'Farrell	Update motion to remand argument outline to include factors on permissive/equitable remand.	1.20	708.00
10/29/25	Leah O'Farrell	Draft notice of hearing; (.2); review local procedures on remote witness testimony (.2); enter electronic notice of appearance for P. Lohse (.3).	0.70	413.00
10/29/25	Leah O'Farrell	Attention to comment from K. Matsoukas on argument outline for remand and review pleadings regarding same.	0.30	177.00
10/29/25	Leah O'Farrell	Draft pro hac for K. Warren based on emails with K. Matsoukas and T. Schmeltz.	0.20	118.00
10/29/25	Leah O'Farrell	Draft argument outline for emergency hearings for P. Lohse.	0.50	295.00
10/29/25	Leah O'Farrell	Attention to inquiry from P. Lohse regarding witnesses at Transcend motion to remand (.1); review exhibit and witness list regarding same (.1).	0.20	118.00
10/29/25	Leah O'Farrell	Review draft exhibit list and exhibits.	0.50	295.00
10/29/25	Leah O'Farrell	Communication with P. Lohse regarding motion to compel and review of exhibit list (.2); communication with L. Parks regarding same (.1).	0.30	177.00
10/29/25	Anita Peterson	Review communications with Quinn Emanuel regarding as-filed 2025-10-28 (Dkt 1881) Motion to Enforce the Purchase and Sale Agreement with Whinstone, 2025-10-28 (Dkt 1882) Notice of Hearing (regarding Quinn Emanuel's Third Interim Fee Application), 2025-10-28 (Dkt 1883) Special Committee's Motion to Seal Portions of Emergency Motion, 2025-10-28 (Dkt 1884) Emergency Motion for Authority to Pay Fees to LKC (with Exhibit A), 2025-10-28 (Dkt 1885) Sealed Special Committee's Motion to Seal Portions of Emergency Motion (with Exhibits B-D) and assist attorneys in executing strategy per request of P. Lohse (.8); review communications with Quinn Emanuel regarding	7.00	2,590.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		<p>exhibits filed under seal (.2); review communications with Porter Hedges requesting unredacted motion (.2); review incoming transcript from 2025-10-28 deposition of Jonathan Cohn and assist attorneys in executing strategy per request of T. Schmeltz (.2); review communications with LKC, Porter Hedges regarding 2025-10-28 supplemental productions (.2); review communications with Akin regarding 2025-10-28 supplemental production (.2); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.5); review communications with LKC regarding deposition scheduling (.1); review communications with C. Topping regarding deposition preparation (.1); review 2025-10-28 communications with LKC, Porter Hedges regarding objections and designations for Rule 30(b)(6) deposition topics (.2); communications with B. Riley regarding November 3 hearing logistics per request of P. Lohse (.3); review additional communications with B. Riley regarding 2025-11-03 hearing logistics (.2); draft Barnes & Thornburg LLP's Thirteenth Monthly Fee Statement for the Period September 1, 2025 through September 30, 2025 with Exhibits A - C (1.3); communications with T. Schmeltz regarding monthly fee statement (.2); review incoming 2025-10-29 (Dkt 1887) Order Granting Emergency Motion for Authority to Pay Fees to LKC and assist attorneys in executing strategy per request of P. Lohse (.2); communications with investigative team regarding same (.2); assist attorneys in executing strategy per request of P. Lohse focusing on 2025-11-03 hearing logistics (1.9).</p>		
10/29/25	Anita Peterson	<p>Communications with investigative team regarding meet and confer with Transcend regarding Rule 30(b)(6) topics, fee objection (.2); communications with investigative team regarding 30(b)(6) depositions (.4); review communications from counsel for N. Cerasuolo</p>	4.00	1,480.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		forwarding 2025-10-28 (Dkt 41) Defendants' Joint Witness and Exhibits for 2025-10-30 Transcend's Motion to Remand and assist attorneys in executing strategy per request of T. Schmeltz (.5); assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-10-30 hearings (1.4); review communications with Akin regarding depositions (.2); review communications with C. Potter regarding 30(b)(6) deposition topics (.2); review communications with LKC regarding LKC discovery matters (.2); review communication with LKC regarding LKC fee application (.2); review communications from office of C. Potter forwarding 2025-10-28 Plaintiffs' Joint Witness and Exhibits for 2025-10-30 Transcend's Motion to Remand and assist attorneys in executing strategy per request of T. Schmeltz (.5); review communications with LKC regarding hearing exhibit designations, updated deposition designations (.2).		
10/29/25	Thomas G. Haskins	Preparation for hearing in bankruptcy matter including communication with T. Schmeltz and team regarding same.	0.80	636.00
10/29/25	Paige Lohse	Preparations for hearing on LKC dispute (4.9); LKC discovery and document responses (5.5); revise and delegate on evidence motion (1.2); preparations for hearing on Transcend dispute (.6); analyze and send correspondence and filings regarding recent developments to ensure appropriate tasks implemented (2.2).	14.40	9,216.00
10/29/25	Addison Smith	Review and tag documents for C. Wheeler trial exhibits.	1.60	944.00
10/29/25	Charlotte Underwood	Review invoices for SAFE contribution claim (.8); prepare for upcoming depositions and hearings (3.7); communications with N. He on LKC related matters (.4); review and revise designations (.7).	5.60	5,320.00
10/29/25	Kevin Warren	Identify potential trial exhibits related to J. Cohn to prepare for hearing on LKC fee application, with related review of J. Cohn exhibits used,	4.70	2,021.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		and additional documents from the database, with related coordination thereof with K. Murphy to prepare trial exhibit list.		
10/29/25	Kevin Warren	Evaluate potential exhibits related to Chase Blackmon, with related review of deposition transcript and additional documents identified from the database to prepare for hearing on LKC fee application.	3.40	1,462.00
10/29/25	Kevin Warren	Evaluate documents within supplemental productions to determine additions to trial exhibit list to prepare for hearing on LKC fee application.	2.30	989.00
10/29/25	Kevin Warren	Communications with BT team (K. Murphy, L. Parks, H. Casper, C. Underwood, A. Smith, P. Lohse) to coordinate initial draft of trial exhibit list, with related quality check of compiled documents.	2.10	903.00
10/29/25	Trace (Vincent P.) Schmeltz	Prepare for 30(b)(6) depositions with C. Topping and D. Eaton (1.9); review AI findings regarding Akin Gump bills (.4); BDO preparation (.3); produce witnesses in 30(b)(6) depositions (7.5); D. Eaton follow-up (.1).	10.20	10,200.00
10/29/25	Anna Bninski	Summarize topics covered in material to claw back, including representative sample documents, at request of P. Lohse (3.2); draft points for oral argument at hearing relating to claw back with factual and case law support (2.1).	5.30	2,385.00
10/29/25	Haley Casper	Conduct supplemental review and notation of K. Hays deposition transcript in furtherance of designating for additional 30(b)(6) topic (.5); communicate regarding same (.2).	0.70	367.50
10/29/25	Haley Casper	Review and supplement C. Wheeler and K. Hays exhibits and materials for trial including internal communications regarding same while attending 30(b)(6) depositions (5.5); continue review and preparation of materials in furtherance of trial and communicate internally regarding status and strategy (.8).	6.30	3,307.50
10/29/25	Kenneth Kansa	Email to K. Matsoukas on objections to discovery (.1); email to P. Lohse on LKC order	2.90	3,103.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.1); email to C. Underwood on plan discovery (.1); email to K. Matsoukas on 30(b)(6) plan confirmation discovery from Transcend (.1); email to T. Schmeltz and K. Matsoukas on Transcend plan objections (.1); t/c to K. Matsoukas on same (.2); review and revise list of 30(b)(6) topics (.4); email to P. Tomasco on same (.1); email to T. Schmeltz on allocation of 30(b)(6) topics (.2); email to K. Matsoukas on same (.2); outline confirmation brief topics (.6); review Transcend 30(b)(6) topics and outline responses to same (.4); review solicitation materials for plan confirmation issues (.3).		
10/29/25	Kathleen A. Murphy	Hearing preparation including coordination with multiple vendors and P. Lohse regarding hearing logistics (2.2); email correspondence with court reporters regarding order for deposition exhibits (.2); review files to format exhibits for hearing exhibit list and prepare draft exhibit list for attorney review (7.8).	10.20	3,213.00
10/29/25	Eric Beard	Assist case team with creation of shared Box folder regarding LKC production document exports.	0.30	84.00
10/29/25	Ning He	Confer with BDO regarding expert report (1.0); analyze materials regarding expert report (3.2); analyze materials regarding Whinstone settlement (3.5); prepare materials for key witnesses in LKC trial (6.0); analyze documents regarding PSA negotiations (2.0).	15.70	12,089.00
10/30/25	Joseph Kipp	Upload C. Blackmon direct examination outline to shared folder for K. Warren's review.	0.10	43.00
10/30/25	Joseph Kipp	Update summaries of Porter Hedges and LKC email correspondence.	0.20	86.00
10/30/25	Joseph Kipp	Confer with P. Lohse and LKC hearing team regarding exhibit lists.	0.20	86.00
10/30/25	Joseph Kipp	Compile J. Cohn exhibit list for K. Warren's review.	0.90	387.00
10/30/25	Joseph Kipp	Revise Motion to Compel to reflect most recent factual developments regarding LKC discovery.	0.30	129.00
10/30/25	Joseph Kipp	Research Fifth Circuit caselaw discussing burden of party moving for 30(b)(6) deposition	0.20	86.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		to describe topics with reasonable particularity.		
10/30/25	Joseph Kipp	Research federal caselaw admitting as FRE 803(6) business records reports.	1.80	774.00
10/30/25	Lydia Parks	Review and revise the motion to compel regarding LKC.	1.90	817.00
10/30/25	Paige Lohse	Preparations for hearing on LKC dispute (4.7); call with t. Schmeltz regarding hearing and next steps (.2); prepare for and attend hearing (2.2); LKC discovery and document responses (.6); LKC conferrals (.3); analyze and send correspondence and filings regarding recent developments (3.2); filings and exhibit exchanges (2.1).	13.30	8,512.00
10/30/25	Anita Peterson	Finalize Barnes & Thornburg LLP's Thirteenth Monthly Fee Statement for the Period September 1, 2025 through September 30, 2025 with Exhibits A - C (.6); communications with Quinn Emanuel to coordinate filing of Barnes & Thornburg LLP's Thirteenth Monthly Fee Statement for the Period September 1, 2025 through September 30, 2025 with Exhibits A - C, Ledes statement (.2); communications with investigative team regarding meet and confer with Transcend regarding Rule 30(b)(6) topics, fee objection (.3); review communications with LKC regarding hearing exhibit designations, updated deposition designations and assist attorneys in executing strategy per request of T. Schmeltz (.3); review communications with LKC, Porter Hedges regarding supplemental production and assist attorneys in executing strategy per request of P. Lohse (.2); review communications with Akin regarding supplemental productions and assist attorneys in executing strategy per request of P. Lohse (.2); review communications with LKC, Porter Hedges regarding discovery clawback 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 (.5); assist attorneys in executing strategy per request of P.	4.50	1,665.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/30/25	Anita Peterson	<p>Lohse focusing on preparation for 2025-11-03 hearing including logistics (2.0).</p> <p>Review communications with P. Tomasco, C. Potter, R. Mates, Akin, UCC parties regarding coordinating meet and confer on Rule 30(b)(6) topics and assist attorneys in executing strategy per request of K. Matsoukas (.3); review incoming 2025-10-30 (Dkt 1895) LKC's Witness and Exhibit List for Hearing on November 3, 2025 and assist attorneys in executing strategy per request of P. Lohse (.3); review communications with LKC regarding coordinating deposition of J. Nardini (.1); review communications with LKC regarding 30(b)(6) deposition transcripts (.2); preparation for 2025-11-03 hearing per request of P. Lohse (.6); review communication with LKC, Porter Hedges regarding conferral relating to topic 2 for Rule 3(b)(6) deposition notice and assist attorneys in executing strategy per request of P. Lohse (.2); review as-filed 2025-10-30 (Dkt 1894) Barnes & Thornburg LLP's Thirteenth Monthly Fee Statement for the Period September 1, 2025 through September 30, 2025 (.2); emails with fee notice parties regarding 2025-10-30 (Dkt 1894) B&T's Thirteenth Monthly Fee Statement with Exhibits A-C (.2); review communication with United States Trustee regarding 2025-10-30 (Dkt 1894) B&T's Thirteenth Monthly Fee Statement with Exhibits A-C and Ledes data (.2); precise tracking and timely updates of deadlines and filings (.2); review communications with investigative team regarding emergency hearing and assist attorneys in executing strategy per request of P. Lohse (.3); review multiple communications with LKC, Porter Hedges regarding coordinating deposition of BDO representative, report (.3); review communications with LKC, Porter Hedges regarding B. Riley representative will no longer be called (.1); review communications with LKC, Porter Hedges regarding Special Committee's Exhibit List (.2); review communications with LKC, Porter Hedges</p>	4.00	1,480.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		regarding additional clawback (.2); review communications with Akin regarding additional clawback (.2); review communications with Quinn Emanuel regarding clawback (.2).		
10/30/25	Leah O'Farrell	Review and edit draft motion to compel.	1.20	708.00
10/30/25	Leah O'Farrell	Communication regarding motion to compel with M. Whitner (.1); draft notice of withdrawal of claims of misconduct against LKC (.4).	0.50	295.00
10/30/25	Leah O'Farrell	Communications with LKC Dispute team regarding witness and exhibit list (.2); edit witness list and incorporate reservations of rights into witness and exhibit list (.6).	0.80	472.00
10/30/25	Leah O'Farrell	Finalize witness and exhibit list and coordinate filing of same.	0.30	177.00
10/30/25	Leah O'Farrell	Begin draft of supplemental exhibit list (.2); calendar deadline for supplemental list (.1).	0.30	177.00
10/30/25	Leah O'Farrell	Review procedures on exhibits and email with P. Lohse regarding same (0.1); communication with K. Warren regarding sealing exhibits and exhibit list and draft email to LKC dispute team regarding suggestion to raise issue at the hearing on the motion to dismiss (.4).	0.50	295.00
10/30/25	Leah O'Farrell	Revise argument outline for emergency hearings to include logistics on exhibits.	0.20	118.00
10/30/25	Leah O'Farrell	Communications with P. Lohse regarding motion to compel and 4pm emergency hearings.	0.30	177.00
10/30/25	Leah O'Farrell	Revise motion to compel, draft T. Schmeltz declaration in support.	2.90	1,711.00
10/30/25	Leah O'Farrell	Attention to discussions regarding reply from LKC (.2); review rules on reply (.3); commence research on motion to strike reply and need to review LKC exhibits and deposition transcripts (1.2).	1.70	1,003.00
10/30/25	Aaron Gavant	Communications with BT team regarding matter status and next steps.	0.50	402.50
10/30/25	Thomas G. Haskins	Preparation for hearing (.4); attendance at hearing (2.2); communication with T. Schmeltz and team regarding same (.2).	2.80	2,226.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/30/25	Kevin Warren	Review compiled trial exhibits, with related supplementing of certain attachments, to prepare for service to LKC to prepare for hearing on fee application.	3.90	1,677.00
10/30/25	Kevin Warren	Communications regarding approach to finalizing initial exhibit list with P. Lohse and team.	0.80	344.00
10/30/25	Kevin Warren	Communications with J. Kipp to coordinate final review of trial exhibits related to J. Cohn to assist P. Lohse in finalizing exhibit list to prepare for hearing on LKC fee application.	0.40	172.00
10/30/25	Kevin Warren	Conduct final review of potential documents for trial exhibits to prepare to file initial exhibit list to assist P. Lohse to prepare for LKC hearing.	1.20	516.00
10/30/25	Kevin Warren	Serve LKC trial exhibits to prepare for hearing on fee dispute.	0.50	215.00
10/30/25	Trace (Vincent P.) Schmeltz	Email exchange regarding LKC discovery (.8); prepare for remand hearing (2.1); attend remand hearing and discuss resolution of same (1.3); hearing preparation call with BDO (1.3); review expert report (1.2); call with P. Lohse regarding hearing and next steps (.6); call with C. Topping (.3); call with N. He regarding expert (.3).	7.90	7,900.00
10/30/25	Charlotte Underwood	Confer with client regarding valuation (.5); analyze transcripts, coordinate on motions and otherwise prepare for LKC and Transcend hearings (2.5); communications with T. Schmeltz regarding outstanding issues (.4).	3.40	3,230.00
10/30/25	Haley Casper	Coordinate and strategize regarding preparation of exhibit materials for hearing with focus on C. Wheeler and K. Hays supporting materials.	2.60	1,365.00
10/30/25	Haley Casper	Evaluate and supplement Motion to Compel LKC's discovery and simultaneously review document productions in furtherance of same.	0.90	472.50
10/30/25	Kenneth Kansa	Emails to K. Matsoukas on 30(b)(6) topics for confirmation (.2); call with Quinn Emanuel and Province teams on deposition topics, confirmation brief, and related issues (.5); email to C. Underwood on substantial contribution claim analysis (.1); email D. Eaton and C.	1.10	1,177.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Underwood on deposition preparation (.1); email to T. Schmeltz and BT team on deposition topics conferral (.2).		
10/30/25	Kathleen L. Matsoukas	Review LKC reply brief and related exhibits and declaration (1.8); communicate with other outside counsel regarding meet and confer on Transcend's 30(b)(6) topics (.3); work on expert/30(b)(6) witness report and testimony (2.7); multiple communications with N. He regarding expert report (.9); communicate with counsel for LKC regarding expert report (.2); participate in discussions with N. He and expert M. Rosten (1.0).	6.90	5,382.00
10/30/25	Kathleen A. Murphy	Hearing preparation including compiling, organizing, formatting and labeling trial exhibits (10.5); coordinate with Litigation Support Department regarding document to be labeled for production (.1); coordinate regarding hearing logistics (.3).	10.90	3,433.50
10/30/25	Eric Beard	Assist case team with creation of Trial Exhibit stamps and update final versions on shared Box folder.	1.50	420.00
10/30/25	Eric Beard	Assist case team with additional LKC productions.	3.00	840.00
10/30/25	Janelle Peters	Upload document (.1); create searches for case team (.2); run production for case team (.2).	0.50	132.50
10/30/25	Ning He	Confer with M. Rosen (BDO) and K. Matsoukas regarding expert report (1.0); confer with BDO, K. Hays, and C. Topping regarding damage analysis (1.0); analyze documents regarding damage analysis (4.2); call with T. Schmeltz regarding expert (.3); analyze documents regarding trial arguments (5.2); revise prep materials for trial witnesses (2.6).	14.30	11,011.00
10/31/25	Joseph Kipp	Revise memo describing applicability of FRE 803(6) business records exception to report prepared by outside consultant.	0.30	129.00
10/31/25	Joseph Kipp	Confer with T. Schmeltz and LKC hearing team to discuss strategy and logistics.	2.00	860.00
10/31/25	Joseph Kipp	Communication with P. Lohse regarding Federal Rules of Evidence research memo.	0.30	129.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/31/25	Joseph Kipp	Research Fifth Circuit caselaw discussing the admissibility of settlement negotiations under FRE 408 and produce succinct memo summarizing findings.	1.30	559.00
10/31/25	Joseph Kipp	Communication with L. Parks regarding Fifth Circuit contract damages research.	0.10	43.00
10/31/25	Charlotte Underwood	Strategy and preparation call with trial team (2.0); call with D. Eaton and K. Kansa regarding deposition preparation (1.0); related follow up (.1).	3.10	2,945.00
10/31/25	Anita Peterson	Assist attorneys in executing strategy per request of P. Lohse focusing on preparation for 2025-11-03 hearing including logistics (2.1); review communications with LKC, Porter Hedges regarding coordinating deposition of expert M. Rosten (BDO representative) (.1); review communication from LKC forwarding as-filed 2025-10-30 (Dkt 1896) SEALED LKC's Witness and Exhibit List for Hearing on November 3, 2025, 2025-10-30 (Dkt 1901) SEALED LKC's Reply in Support of its Final Fee Application, 2025-10-30 (Dkt 1902) SEALED Declaration of Jon Cohn in Support of LKC's Reply in Support of its Final Fee Application and assist attorneys in executing strategy per request of P. Lohse (.4): review Special Committee's as-filed 2025-10-30 (Dkt 1897) Witness and Exhibit List for November 3, 2025 Hearing and assist attorneys in executing strategy per request of P. Lohse (.2); review incoming transcripts and exhibits from 2025-10-28 deposition of Jonathan Cohn and assist attorneys in executing strategy per request of T. Schmeltz (.4); review communications with Quinn Emanuel regarding meet and confer on Rule 30(b)(6) topics (.1); review communications with Quinn Emanuel regarding 2025-10-30 additional discovery clawback (.1); review communication with LKC, Porter Hedges regarding same (.1); review communication with Akin regarding same (.1); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft	6.10	2,257.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Teams platforms for attorney use (.5); conference with BT team (T. Schmeltz, K. Matsoukas, P. Lohse, N. He, H. Hinton, K. Warren, J. Kipp, C. Underwood) regarding preparation for 2025-11-03 hearing including declarations, exhibits (2.0).		
10/31/25	Anita Peterson	Download incoming transcripts and exhibits for 2025-10-29 30(b)(6) deposition of D. Eaton and assist attorneys in executing strategy per request of T. Schmeltz (.4); download incoming transcripts and exhibits for 2025-10-29 30(b)(6) deposition of C. Topping and assist attorneys in executing strategy per request of T. Schmeltz (.4); download incoming transcripts and exhibits for 2025-10-29 30(b)(6) deposition of C. Wheeler and assist attorneys in executing strategy per request of T. Schmeltz (.4); communications with C. Topping regarding recent 2025-10-29 deposition transcripts and exhibits, errata sheet (.3); review communications with C. Topping regarding deposition transcripts, hearing preparation (.3); communications with D. Eaton forwarding 2025-10-29 deposition transcripts and exhibits (.2); communications with C. Wheeler forwarding 2025-10-29 deposition transcripts and exhibits (.2); communications with T. Schmeltz regarding same (.2); assist attorneys in executing strategy relating to depositions per request of T. Schmeltz (.3); communications with C. Underwood regarding same (.2); review communications with LKC regarding hearing exhibits (.2); communications with investigative team regarding same (.2); review communications with LKC regarding deposition of M. Rosten (BDO) (.2); review communications with Chase Blackmon confirming attendance at 2025-11-03 hearing (.2); review communications with Porter Hedges regarding same (.2); review communications with Akin forwarding 2025-10-30 (Dkt 1896) SEALED LKC's Witness and Exhibit List for Hearing on November 3, 2025 under Common Interest (.1); review communications with Porter	5.90	2,183.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		Hedges and Akin regarding clawback request (.2); communications with investigative team regarding same (.1); review communications with Porter Hedges regarding hearing exhibits (.1); review communications with LKC, Porter Hedges regarding Special Committee's clawback request (.2); review communications with LKC, Porter regarding Special Committee's trial exhibits (served via BOX link) (.2); assist attorneys in executing strategy regarding same per request of P. Lohse (.6); review as-filed 2025-10-31 (Dkt 1911) Supplemental Exhibit List for November 3, 2025 Hearing and assist attorneys in executing strategy per request of P. Lohse (.2); communications with Porter Hedges, LKC regarding same (3).		
10/31/25	Charlotte Underwood	Conduct legal research in connection with deponent testimony (.2); review and make notes regarding Transcend discovery requests (.2).	0.40	380.00
10/31/25	Charlotte Underwood	Review draft interview outline.	0.30	285.00
10/31/25	Anita Peterson	Continue to assist attorneys in executing strategy per request of P. Lohse focusing on after-hours preparation for 2025-11-03 hearing including logistics (.7); review communications with Akin regarding Special Committee's clawback request (.2); review incoming rough draft transcript from 2025-10-31 deposition of M. Rosten (BDO) and assist attorneys in executing strategy per request of K. Matsoukas (.2); review communications with expert M. Rosten regarding challenges and assist attorneys in executing strategy per request of N. He (.2); review communication from C. Potter regarding the Transcend Group's First Request for Production to Debtors and assist attorneys in executing strategy per request of P. Lohse (.2); review communication from C. Potter forwarding The Transcend Group's First Request for Production to the Special Committee and assist attorneys in executing strategy per request of P. Lohse (.2).	1.70	629.00
10/31/25	Kevin Warren	Hearing preparation meeting to strategize	2.20	946.00

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		approach to KLC dispute with T. Schmeltz and team (2.0); follow up regarding same (.2).		
10/31/25	Kevin Warren	Produce supplemental production to LKC to prepare for fee application hearing.	2.70	1,161.00
10/31/25	Kevin Warren	Finalize trial exhibit list, with additions and supplements, including coordination with K. Murphy, L. O'Farrell, H. Casper, and Clerk.	4.40	1,892.00
10/31/25	Lydia Parks	Research and summarize the ability to sequester witnesses during the LKC trial and limit the role of an attorney-witness (2.4); review and discuss additional research from J. Kipp (.2); draft a motion to seal exhibits and supplemented exhibit and witness list for the LKC trial (1.5).	4.10	1,763.00
10/31/25	Kathleen L. Matsoukas	Participate in team trial preparation meeting (2.0); participate in preparation session for deposition of M. Rosten (3.0); defend deposition of M. Rosten (4.7).	9.70	7,566.00
10/31/25	Leah O'Farrell	Attention to message from K. Warren regarding clawing back exhibits.	0.10	59.00
10/31/25	Leah O'Farrell	Attend trial prep meeting with LKC dispute team.	2.00	1,180.00
10/31/25	Leah O'Farrell	Prepare summary of reply and pull research regarding burden of proof at hearing.	1.10	649.00
10/31/25	Leah O'Farrell	Coordinate with L. Parks to draft motion to seal exhibits.	0.20	118.00
10/31/25	Leah O'Farrell	Review exhibits designated by LKC to determine if all produced (.4); email to BT team regarding same (.2).	0.60	354.00
10/31/25	Leah O'Farrell	Draft motion to seal, notice of exhibits and supplemental exhibit list (.4); communication with K. Warren and K. Murphy regarding same (.2); email to Clerk with filing and instructions (.2).	0.80	472.00
10/31/25	Leah O'Farrell	Finalize declaration of T. Schmeltz and revise motion based on reply and exhibit list.	1.20	708.00
10/31/25	Leah O'Farrell	Research regarding 9014 and expert disclosures and challenge to expert.	0.90	531.00
10/31/25	Aaron Gavant	Review various draft filings, and related items	0.70	563.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		(.4); multiple communications with BT team regarding approach to same (.3).		
10/31/25	Haley Casper	Analyze documents and coordinate internally regarding preparation of trial exhibits for hearing (.7); attend internal strategy meeting regarding preparation for LKC dispute hearing (2.0); participate in portion of call with BDO expert in furtherance of report (.3); continue preparation of trial exhibits and coordinate regarding strategy for hearing (4.3).	7.30	3,832.50
10/31/25	Kenneth Kansa	Participate in deposition preparation session with D. Eaton and C. Underwood (1.0); conference with A. Wissel on confirmation research (.2); email to C. Underwood on meet and confer with C. Potter on fee objection (.1); email to N. He on same (.1); review Transcend Group RFPs (.2).	1.60	1,712.00
10/31/25	Ning He	Prepare M. Rosten for deposition (3.0); confer with team regarding trial prep (2.0); confer with C. Topping, K. Hays, C. Wheeler, and M. Rosten regarding background (1.0); attend M. Rosten deposition (4.7); research and analyze issues regarding admissibility of expert deposition (.8).	11.50	8,855.00
10/31/25	Paige Lohse	Preparations for hearing on LKC dispute.	3.70	2,368.00
10/31/25	Abigail Wissel	Conference with K. Kansa to discuss legal research regarding on liquidation analysis (.2); follow up regarding same (.3).	0.50	187.50

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
10/31/25	Kathleen A. Murphy	Hearing preparation including assist with locating, formatting and updating hearing exhibits and Supplemental Trial Exhibit List (4.8); coordinate filing hearing exhibits with court and formatting pleadings (1.0); coordinate with vendor regarding printing of hearing exhibits for court (1.1); coordinate hearing logistics per request of P. Lohse (.9); prepare email correspondence to P. Lohse and A. Peterson summarizing hearing (.2).	8.00	2,520.00
Fees for Services				\$ 1,240,444.00

	Hours	Rate	Amount
Charlotte Underwood	93.70	\$950.00	\$89,015.00
Randal J. Kaltenmark	0.80	\$915.00	\$732.00
Carrie M. Raver	5.50	\$845.00	\$4,647.50
Aaron Gavant	9.00	\$805.00	\$7,245.00
Thomas G. Haskins	3.80	\$795.00	\$3,021.00
Kathleen L. Matsoukas	114.50	\$780.00	\$89,310.00
Ning He	143.00	\$770.00	\$110,110.00
Paige Lohse	281.50	\$640.00	\$180,160.00
Scott Pelozza	14.30	\$640.00	\$9,152.00
Leah O'Farrell	73.00	\$590.00	\$43,070.00
Addison Smith	28.00	\$590.00	\$16,520.00
Mariah A. Whitner	19.50	\$590.00	\$11,505.00
Haley Casper	208.80	\$525.00	\$109,620.00
Megha Mathur	38.10	\$480.00	\$18,288.00
Charity Seaborn	31.40	\$480.00	\$15,072.00
Anna Brinski	16.20	\$450.00	\$7,290.00
Melissa Bonnici	33.70	\$430.00	\$14,491.00
Joseph Kipp	100.00	\$430.00	\$43,000.00
Kathleen Mangan	13.40	\$430.00	\$5,762.00
Lydia Parks	23.80	\$430.00	\$10,234.00
Kevin Warren	186.60	\$430.00	\$80,238.00

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FIDUCIARY DUTY INVESTIGATION

	Hours	Rate	Amount
Glenn R. de Roziere	8.40	\$385.00	\$3,234.00
Joseph Tate	6.10	\$380.00	\$2,318.00
Abigail Wissel	13.20	\$375.00	\$4,950.00
Anita Peterson	141.30	\$370.00	\$52,281.00
Kathleen A. Murphy	36.80	\$315.00	\$11,592.00
Elisabeth Carpenter	5.00	\$300.00	\$1,500.00
Eric Beard	4.80	\$280.00	\$1,344.00
Janelle Peters	19.10	\$265.00	\$5,061.50
Kenneth Kansa	128.30	\$1,070.00	\$137,281.00
Trace (Vincent P.) Schmeltz	152.40	\$1,000.00	\$152,400.00
TOTALS	1,954.00		\$1,240,444.00
			0

Other Charges:

09/30/25	168-Pacer Court Filing System Charges 09/01/2025 - 09/30/2025	7.80
09/30/25	168-Pacer Court Filing System Charges 09/01/2025 - 09/30/2025	4.70
09/30/25	168-Pacer Court Filing System Charges 09/01/2025 - 09/30/2025	3.30
10/01/25	Westlaw - Computerized Legal Research	1,619.71
10/01/25	E-Filing Court Documents - E-Filing documents with Court 10-01-2025	50.00
10/01/25	E-Filing Court Documents - E-Filing documents with Court 10-01-2025	50.00
10/03/25	American Express - American Express - SCHMELTZ III/VINCENT PAUL - Hotel - "JW MARRIOTT HOUSTON DOWNTOWN, HOUSTON, TX" - INV137970	462.14
10/03/25	E-Filing Court Documents - E-Filing documents with Court 10-03-2025	100.00
10/06/25	Westlaw - Computerized Legal Research	2,327.00
10/07/25	Westlaw - Computerized Legal Research	404.93
10/07/25	E-Filing Court Documents - E-Filing documents	50.00

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FIDUCIARY DUTY INVESTIGATION

with Court 10-07-2025

10/08/25	Westlaw - Computerized Legal Research	674.88
10/09/25	Copying Charges	34.80
10/10/25	Westlaw - Computerized Legal Research	6,883.78
10/10/25	E-Filing Court Documents - E-Filing documents with Court 10-10-2025	100.00
10/11/25	Westlaw - Computerized Legal Research	2,159.62
10/13/25	E-Filing Court Documents - E-Filing documents with Court 10-13-2025	50.00
10/13/25	E-Filing Court Documents - E-Filing documents with Court 10-13-2025	50.00
10/13/25	E-Filing Court Documents - E-Filing documents with Court 10-13-2025	100.00
10/14/25	American Express - Airfare American Express - SCHMELTZ III/VINCENT PAUL - IAH ORD - 10/16/2025 - 10/16/2025 - INV141145	474.34
10/15/25	Westlaw - Computerized Legal Research	3,779.33
10/16/25	Westlaw - Computerized Legal Research	8,464.86
10/16/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/13/2025 Filing fees for filing pro hac vice. - 10/13/2025	100.00
10/16/25	E-Filing Court Documents - E-Filing documents with Court 10-16-2025	50.00
10/17/25	E-Filing Court Documents - E-Filing documents with Court 10-17-2025	50.00
10/19/25	E-Filing Court Documents - E-Filing documents with Court 10-19-2025	100.00
10/20/25	American Express - American Express - WARREN/KEVIN - ORD DFW ORD - 10/20/2025 - 10/22/2025 - INV142623	705.97
10/20/25	TransUnion-searches in investigative database	6.25
10/20/25	TransUnion-searches in investigative database	6.25
10/20/25	TransUnion-searches in investigative database	6.25
10/20/25	TransUnion-searches in investigative database	6.25

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10/20/25	TransUnion-searches in investigative database	24.50
10/20/25	TransUnion-searches in investigative database	5.00
10/20/25	TransUnion-searches in investigative database	5.00
10/20/25	TransUnion-searches in investigative database	24.50
10/20/25	TransUnion-searches in investigative database	6.25
10/20/25	TransUnion-searches in investigative database	5.00
10/21/25	American Express - Airfare American Express - PETERSON/ANITA - ORD DFW ORD - 10/20/2025 - 10/24/2025 - INV142741	867.55
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	6.25
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	6.25
10/21/25	TransUnion-searches in investigative database	12.25
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10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	5.00
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	24.50
10/21/25	TransUnion-searches in investigative database	6.25
10/21/25	TransUnion-searches in investigative database	12.25
10/21/25	TransUnion-searches in investigative database	5.00
10/22/25	Westlaw - Computerized Legal Research	6,305.24
10/22/25	Color Copies - Resource center	24.00
10/22/25	E-Filing Court Documents - E-Filing documents with Court 10-22-2025	50.00
10/22/25	E-Filing Court Documents - E-Filing documents with Court 10-22-2025	50.00
10/23/25	Westlaw - Computerized Legal Research	4,049.28

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10/23/25	American Express - Airfare American Express - PETERSON/ANITA - DAL MDW - 10/23/2025 - 10/23/2025 - INV143453	605.48
10/23/25	E-Filing Court Documents - E-Filing documents with Court 10-23-2025	50.00
10/24/25	Jamie Stapleton - Mastercard - EAST HAMPTON CRESCENT : Lunch Order for Chase Blackmon Deposition Prep - 10/21/2025	45.40
10/24/25	E-Filing Court Documents - E-Filing documents with Court 10-24-2025	100.00
10/24/25	E-Filing Court Documents - E-Filing documents with Court 10-24-2025	50.00
10/24/25	E-Filing Court Documents - E-Filing documents with Court 10-24-2025	50.00
10/24/25	TransUnion-searches in investigative database	6.25
10/24/25	TransUnion-searches in investigative database	6.25
10/24/25	TransUnion-searches in investigative database	6.25
10/24/25	TransUnion-searches in investigative database	6.25
10/24/25	TransUnion-searches in investigative database	24.50
10/24/25	TransUnion-searches in investigative database	6.25
10/24/25	TransUnion-searches in investigative database	6.25
10/25/25	American Express - Airfare American Express - PETERSON/ANITA - DFW ORD - 10/23/2025 - 10/23/2025 - INV143360	-833.27
10/25/25	American Express - American Express - PETERSON/ANITA - DFW ORD - 10/23/2025 - 10/23/2025 - INV143360	399.50
10/25/25	TransUnion-searches in investigative database	5.00
10/25/25	TransUnion-searches in investigative database	5.00
10/25/25	TransUnion-searches in investigative database	6.25
10/26/25	American Express - Airfare American Express - PETERSON/ANITA - DAL MDW - 10/23/2025 - 10/23/2025 - INVC143701	-100.00
10/27/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/22/2025 Filing fees for filing pro hac vice. -	100.00

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FIDUCIARY DUTY INVESTIGATION

10/22/2025

10/27/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/22/2025 Filing fees for filing pro hac vice. - 10/22/2025	100.00
10/27/25	American Express - Airfare American Express - WARREN/KEVIN - ORD IAD - 10/27/2025 - 10/27/2025 - INV144311	352.94
10/27/25	E-Filing Court Documents - E-Filing documents with Court 10-27-2025	100.00
10/27/25	E-Filing Court Documents - E-Filing documents with Court 10-27-2025	100.00
10/27/25	E-Filing Court Documents - E-Filing documents with Court 10-27-2025	50.00
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Hotel to office - 10/21/2025	17.30
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Office to hotel - 10/21/2025	18.40
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - TRAVEL TO DALLAS AT REQUEST OF TRACE SCHMELTZ FOR RHODIUM DEPOSITIONS Home to Airport - 10/20/2025	80.70
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Hotel to office - 10/22/2025	30.38
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Airport to hotel - 10/20/2025	145.48
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Airport to home - 10/23/2025	62.96
10/28/25	Anita Peterson - Anita Peterson - Taxi/Car Service - Hotel to office - 10/23/2025	38.00
10/28/25	Jamie Stapleton - Mastercard - 10/23/2025: Tiff's Treats for Chase Blackmon Deposition	110.39
10/28/25	Jamie Stapleton - Mastercard - MENDOCINOFARMS - 10/22/2025: Lunch for Chase Blackmon Deposition	169.53
10/28/25	Deposition Solutions LLC dba Lexitas - Deposition Solutions LLC dba Lexitas - Certified copy of transcript of Kevin Hays Inv Number:	3,516.29

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FIDUCIARY DUTY INVESTIGATION

1002801725752 10/27/2025

10/28/25	American Express - American Express - WARREN/KEVIN - DCA AUS - 10/28/2025 - 10/28/2025 - INV144441	919.48
10/28/25	Kevin Warren - Kevin Warren - Lodging - Hotel stay to prepare for and help defend a witness for deposition. - 10/20/2025 - 10/23/2025	1,381.22
10/28/25	E-Filing Court Documents - E-Filing documents with Court 10-28-2025	100.00
10/29/25	Westlaw - Computerized Legal Research	6,710.17
10/29/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/24/2025 Filing fees for filing pro hac vice. - 10/24/2025	100.00
10/29/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/23/2025 Filing fees for filing pro hac vice for Kevin Warren. - 10/23/2025	100.00
10/29/25	Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 10/23/2025 Filing fees for filing pro hac vice for Leah O'Farrel. - 10/23/2025	100.00
10/29/25	E-Filing Court Documents - E-Filing documents with Court 10-29-2025	100.00
10/29/25	E-Filing Court Documents - E-Filing documents with Court 10-29-2025	50.00
10/30/25	Westlaw - Computerized Legal Research	3,972.02
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride - Return from Dinner at LAS PALMAS, 2708 Routh St. Dallas, TX to 650 North Pearl St., Dallas, TX - 10/22/2025	18.65
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride from Dallas Love Field Airport (DAL) Dallas, TX to 2100 McKinney Ave., Dallas, TX - 10/21/2025	37.64

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FIDUCIARY DUTY INVESTIGATION

10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride - TO Dinner at LAS PALMAS, 2708 Routh St. Dallas, TX FROM 650 North Pearl St., Dallas, TX - 10/21/2025	17.51
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride from 2121 N Pearl St., Dallas, TX to 650 N. Pearl St., Dallas, TX - 10/23/2025	17.68
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride from Midway Airport (MDW) Chicago, IL to 926 Maple Ave., Downers Grove, IL - 10/23/2025	84.48
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride from 2121 North Pearl Street, Dallas, TX to 8008 Herb Kelleher Way Dallas, TX - 10/23/2025	55.45
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Taxi/Car Service - Trip to Texas for Rhodium Preparation Session Uber ride from 650 N Pearl St., Dallas, TX to 2100 McKinney Ave, Dallas, TX - 10/23/2025	29.22
10/30/25	Trace (Vincent P.) Schmeltz III - Breakfast - Preparation Session Breakfast with Witness at BEATRIX Loop, 155 N. Upper Wacker Dr., Chicago, IL - K. Hays, T. (Vincent P.) Schmeltz - 10/24/2025	56.18
10/30/25	Deposition Solutions LLC dba Lexitas - Deposition Solutions LLC dba Lexitas - Certified copy transcript of Chase Blackmon - Confidential Inv Number: 1002801725990 10/27/2025	4,508.89
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Trip to Texas for Rhodium Preparation Session Flight from Dallas, TX (DAL) airport to MDW Chicago, airport - Flight	493.48

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FIDUCIARY DUTY INVESTIGATION

	Date - 10/23/2025 - From Dallas, TX to Chicago, IL - Transaction Date - 10/22/2025	
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Trip to Texas for Rhodium Preparation Session Flight from Washington D. C. (Reagan) airport to DAL, Dallas (love) airport - Flight Date - 10/21/2025 - Dallas, Texas - Transaction Date - 10/20/2025	425.48
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - T. Schmeltz Lodging - Trip to Texas for Rhodium Preparation Session Dallas Marriott Downtown,650 North Pearl Street, Dallas, TX - 10/21/2025 - 10/23/2025	1,314.14
10/30/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - A. Peterson Lodging - Trip to Texas for Rhodium Preparation Session Dallas Marriott Downtown,650 North Pearl Street, Dallas, TX - 10/21/2025 - 10/23/2025	1,314.14
10/30/25	E-Filing Court Documents - E-Filing documents with Court 10-30-2025	100.00
10/31/25	Westlaw - Computerized Legal Research	1,349.76
10/31/25	Thomas G. Haskins - Thomas G. Haskins - Parking - Parking at DFW (1/3) - split 3 ways. Tommy had a recruiting trip, this BK hearing and another site visit for separate client in Houston - 10/30/2025	51.70
10/31/25	Thomas G. Haskins - Thomas G. Haskins - Taxi/Car Service - Uber to hotel downtown - Travel: Houston TX / BK Hearing - 10/29/2025	63.37
10/31/25	Thomas G. Haskins - Thomas G. Haskins - Taxi/Car Service - Uber from hotel to Houston airport - Travel: Houston TX / BK Hearing - 10/30/2025	164.80
10/31/25	Linda Padron - Linda Padron - Lunch - Mastercard - SPO WESTWINGCAFE - 10/28/2025 - Lunch for deposition in the Rhodium matter - Jon Cohn,Thomas Dissher,Erick Thacker,Trace (Vincent P.) Schmeltz,Kevin Warren - 10/28/2025	103.01
10/31/25	Emily Roberts - Mastercard - HANNAH'S	240.28

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

BRETZEL Lunch provided for K. Hays
Deposition - 10/24/2025

10/31/25	FedEx PS Ship - Fedex - Inv#905833645 - to Paige Lohse (Guest), The Lancaster Hotel, HOUSTON, TX, US from Kathleen Murphy	134.31
10/31/25	FedEx PS Ship - Fedex - Inv#905833645 - to Paige Lohse (Guest), The Lancaster Hotel, HOUSTON, TX, US from Kathleen Murphy	155.35
10/31/25	FedEx PS Ship - Fedex - Inv#905833645 - to Paige Lohse (Guest), The Lancaster Hotel, HOUSTON, TX, US from Kathleen Murphy	127.98
10/31/25	Thomas G. Haskins - Thomas G. Haskins - Return flight - Travel: Houston TX / BK Hearing - Flight Date - 10/30/2025 - Dallas TX - Transaction Date - 10/29/2025	407.48
10/31/25	Trace (Vincent P.) Schmeltz III - Trace (Vincent P.) Schmeltz III - Trip to Dallas, Texas - Client meeting Trip from Dallas, TX, airport (DFW) to Chicago, airport (ORD) - Flight Date - 10/24/2025 - Chicago Airport ORD - Transaction Date - 10/20/2025	2,320.89
10/31/25	Thomas G. Haskins - Thomas G. Haskins - Lodging - Hotel / Houston TX - Travel: Houston TX / BK Hearing - 10/29/2025 - 10/30/2025	384.93
10/31/25	Court Reporters Clearinghouse Inc - Court Reporters Clearinghouse Inc - Deposition copy - Charles Topping Inv Number: 210015 10/31/2025	729.81
10/31/25	Everlaw Inc - Professional Services; Active Review - eDiscovery Hosting Services Subscription Fees 10-31-2025	2,520.00
10/31/25	Everlaw Inc - Professional Services; Early Case Assessment - eDiscovery Hosting Services Subscription Fees 10-31-2025	1,432.00
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	50.00
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	100.00
10/31/25	E-Filing Court Documents - E-Filing documents	100.00

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FIDUCIARY DUTY INVESTIGATION

with Court 10-31-2025

10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	100.00	
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	100.00	
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	50.00	
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	50.00	
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	50.00	
10/31/25	E-Filing Court Documents - E-Filing documents with Court 10-31-2025	750.00	
			\$ 79,453.46

BARNES & THORNBURG LLP

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

Invoice 3499556

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

November 19, 2025
Trace (Vincent P.) Schmeltz
00101065-00000001

PAYABLE UPON RECEIPT

Fees for Services	\$	1,240,444.00
Other Charges	\$	79,453.46
Total This Invoice	\$	1,319,897.46

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.

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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.

November 2025

Time Records and Expenses

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
Total This Invoice	\$	466,382.52

REMITTANCE

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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
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251 LITTLE FALLS DRIVE
WILMINGTON, DE 19808
DAVIDEATON@RHDM.COM

Invoice 3517153

Page 2

December 29, 2025
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 November 30, 2025 as described on the attached detail.

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

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Summary of Invoice

Date	Name	Description	Hours	Amount
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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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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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		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

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		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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DIRECTORS OF RHODIUM

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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

Date	Name	Description	Hours	Amount
		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

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

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
		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
		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).		
11/04/25	Anita Peterson	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	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 & Thornburg's Fourth Interim Fee Application (.2); review 2025-11-04 communications with Quinn Emanuel regarding 2025-11-04 (Dkt 1958) Barnes & 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 & 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 & 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 & 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

Date	Name	Description	Hours	Amount
		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

Date	Name	Description	Hours	Amount
		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

Date	Name	Description	Hours	Amount
		(.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

Date	Name	Description	Hours	Amount
		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

Date	Name	Description	Hours	Amount
		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

Date	Name	Description	Hours	Amount
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

Date	Name	Description	Hours	Amount
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

Date	Name	Description	Hours	Amount
		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

Date	Name	Description	Hours	Amount
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

Date	Name	Description	Hours	Amount
		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

Date	Name	Description	Hours	Amount
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. Izakelian 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

Date	Name	Description	Hours	Amount
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

Date	Name	Description	Hours	Amount
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

Date	Name	Description	Hours	Amount
		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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FIDUCIARY DUTY INVESTIGATION

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

Date	Name	Description	Hours	Amount
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

	Hours	Rate	Amount
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
	TOTALS	540.10	\$412,715.00

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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	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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DIRECTORS OF RHODIUM

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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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DIRECTORS OF RHODIUM

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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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DIRECTORS OF RHODIUM

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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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DIRECTORS OF RHODIUM

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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

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
Total This Invoice	\$	466,382.52

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.

December 2025

Time Records and Expenses

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

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

Invoice 3525518

Page 2

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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DIRECTORS OF RHODIUM

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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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DIRECTORS OF RHODIUM

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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

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

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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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FIDUCIARY DUTY INVESTIGATION

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

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

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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

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

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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

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

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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.

January 2026

Time Records and Expenses

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 3535295

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

February 10, 2026
Trace (Vincent P.) Schmeltz
00101065-00000001

PAYABLE UPON RECEIPT

Fees for Services	\$	33,472.00
Other Charges	\$	498.00
Total This Invoice	\$	33,970.00

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Invoice 3535295

Page 2

February 10, 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 January 14, 2026 as described on the attached detail.

Fees for Services	\$	33,472.00
Other Charges	\$	498.00
Total This Invoice	\$	33,970.00

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

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FIDUCIARY DUTY INVESTIGATION

Summary of Invoice

Date	Name	Description	Hours	Amount
01/02/26	Charlotte Underwood	Confer with Discovery Solutions regarding collection and document request.	0.10	116.00
01/02/26	Kenneth Kansa	Email D. Eaton on call (.1); call with D. Eaton on effective date points (.3).	0.40	530.00
01/05/26	Aaron Gavant	Communications with BT team regarding case status and next steps.	0.40	380.00
01/05/26	Charlotte Underwood	Confer with P. Lohse regarding document request response (.4); confer with Discovery Solutions regarding dataset and review related documents (1.2).	1.60	1,856.00
01/05/26	Paige Lohse	Follow up in response to requests by SAFEs.	2.10	1,669.50
01/05/26	Kenneth Kansa	Review BDO final fee application at M. Michaelis request (.3); email to M. Michaelis on same (.1); review Plan and confirmation order regarding deadlines (.3); email to D. Eaton on same (.1); email to T. Schmeltz on same (.1); email to C. Underwood on remaining deadlines (.1)	1.00	1,325.00
01/06/26	Charlotte Underwood	Communications with P. Lohse regarding response to plan administrator (.1); review documents in connection with the same (.8).	0.90	1,044.00
01/06/26	Kenneth Kansa	Call with C. Topping, company team, and Province on plan administrator requests (.4); review emails on same (.3); email to C. Underwood and K. Muenzing on treatment of incoming materials (.1); email to C. Raver and T. Schmeltz on communications with AIG on plan status and claims alleged by D. Proman (.2); email to Company, P. Tomasco, and Province on plan administrator requests (.1).	1.10	1,457.50
01/06/26	Paige Lohse	Communications with team regarding appeal of LKC fee application order (.2); continue follow up to Akin document requests (.1).	0.30	238.50
01/06/26	Kelly Muenzing	Coordinate filing of Fourth and Final Fee Application of BDO Consulting Group (.2); communications with Quinn Emanuel regarding same (.1).	0.30	130.50

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

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
01/07/26	Leah O'Farrell	Review and revise notice of appeal regarding LKC fee app (.4); draft email to P. Lohse with appeal timeline and considerations (.1).	0.50	355.00
01/07/26	Leah O'Farrell	Attention to inquiry from P. Lohse regarding filing of appeal and review of docket to determine issue.	0.10	71.00
01/07/26	Kenneth Kansa	Review C. Topping emails on document transfer.	0.20	265.00
01/07/26	Paige Lohse	Prepare notice of appeal of LKC order (1.0); continue follow up to SAFE's document request (.4).	1.40	1,113.00
01/08/26	Kelly Muenzing	Communications with K. Kansa regarding BT's Sixteenth Monthly Fee Statement and BT's Fifth Interim Fee Application (.2); precise tracking and timely updates of deadlines and filings (.2).	0.40	174.00
01/08/26	Leah O'Farrell	Email to MCO regarding issue with district court election (.1); communications with P. Lohse regarding notice of appeal and election (.1).	0.20	142.00
01/08/26	Kenneth Kansa	Review LKC demand letter.	0.20	265.00
01/09/26	Kelly Muenzing	Review and revise monthly fee statement per request of Trace Schmeltz.	1.10	478.50
01/09/26	Lydia Parks	Begin drafting the Fifth Interim and Final Fee Application.	1.10	583.00
01/09/26	Kenneth Kansa	Email to C. Topping, D. Eaton, T. Schmeltz on LKC payment.	0.20	265.00
01/09/26	Kenneth Kansa	Review additional emails on LKC payment.	0.40	530.00
01/09/26	Kenneth Kansa	Further email to C. Topping on interest and interpretation of LKC court order on payment.	0.20	265.00
01/09/26	Carrie M. Raver	Address LKC demand and coverage issues (.2); evaluate correspondence regarding the same (.3).	0.50	522.50
01/10/26	Kenneth Kansa	Review emails from T. Schmeltz on J. Cohn demand and administrative expense claims regarding same (.3); email to T. Schmeltz on same (.2); review further T. Schmeltz, M. Hurley, P. Tomasco emails on same (.3).	0.80	1,060.00
01/11/26	Lydia Parks	Continue drafting Fifth Interim and Final Fee Application.	2.60	1,378.00

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DIRECTORS OF RHODIUM

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
01/12/26	Lydia Parks	Communicate with K. Phillips in billing regarding the status of payments made (.1); continue drafting Fifth and Final Interim Fee Application (1.2); draft T. Schmeltz's Certification to accompany the Fifth and Final Interim Fee Application (1.0).	2.30	1,219.00
01/12/26	Kelly Muenzing	Prepare exhibits for BT's Fifth Interim Fee Application (.4); review and revise monthly fee statement per request of T. Schmeltz (3.8); execute strategy focusing on detailed tracking and timely updates of documents to iManage Work and Microsoft Teams platforms for attorney use (.3).	4.50	1,957.50
01/12/26	Kenneth Kansa	T/c A. Popescu on effective date payments (.1); email to C. Underwood on Rhodium bylaws and cert of incorporation (.1); review motion for immediate payment by LKC (.1); email to C. Topping on same (.1); participate in Rhodium board meeting on effective date and LKC payment (1.6); review materials in preparation for board meeting (.3); review T. Schmeltz draft email on LKC payment (.1); email to L. Parks on interim fee application (.1); review effective date documents from Province (.4); review fee application materials (.6); email to K. Muenzing on same (.1).	3.60	4,770.00
01/12/26	Carrie M. Raver	Evaluate LKC demand in more detail and policies pursuant to which to provide notice of LKC demand on special committee members (.8); draft notice letters to insurers (2.0).	2.80	2,926.00
01/12/26	Carrie M. Raver	Address coverage issues related to LKC demand.	0.40	418.00
01/13/26	Kelly Muenzing	Review and revise monthly fee statement per request of T. Schmeltz.	1.00	435.00
01/13/26	Kenneth Kansa	Emails to T. Schmeltz on administrative claims.	0.20	265.00
01/13/26	Carrie M. Raver	Address issues regarding notice to insurer regarding LKC demand against special committee members.	0.50	522.50
01/14/26	Carrie M. Raver	Continue to evaluate policies for coverage issues regarding new LKC claims (1.0); work on strategy regarding the same (.4).	1.40	1,463.00

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

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FIDUCIARY DUTY INVESTIGATION

Date	Name	Description	Hours	Amount
01/14/26	Carrie M. Raver	Participate in call with most of insurer group regarding new LKC claims.	0.50	522.50
01/14/26	Carrie M. Raver	Participate in call with AIG regarding new LKC claims.	0.50	522.50
01/14/26	Kenneth Kansa	Review notice of effective date and transmit to Special Committee and BT team (.2); communications with T. Schmeltz on LKC payment (.1); office conference with L. Parks on interim/final fee application (.1); t/c D. Eaton on effective date issues (.1)	0.50	662.50
01/14/26	Lydia Parks	Correspond with Billing regarding incoming payment and fee adjustment to inform the Fifth and Final Interim Fee Application (.2); confer with K. Kansa regarding the same (.1); correspond with A. Peterson regarding a fee statement question (.1); revise the Fifth Interim and Final Fee Application (1.5).	1.90	1,007.00
01/14/26	Kelly Muenzing	Review and revise monthly fee statement 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 (.3); communications with L. Parks regarding BT's Fifth Interim and Final Fee Application (.2); communications with K. Kansa regarding deadline to object to BT's Fifteenth Monthly Fee Statement (.1); communications with A. Popescu at Province regarding same (.2).	1.10	478.50
01/14/26	Anita Peterson	Communications with L. Parks regarding interim and final fee application.	0.20	89.00
Fees for Services			\$	33,472.00

	Hours	Rate	Amount
Aaron Gavant	0.40	\$950.00	\$380.00
Paige Lohse	3.80	\$795.00	\$3,021.00
Leah O'Farrell	0.80	\$710.00	\$568.00
Lydia Parks	7.90	\$530.00	\$4,187.00
Anita Peterson	0.20	\$445.00	\$89.00

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

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FIDUCIARY DUTY INVESTIGATION

	Hours	Rate	Amount
Kelly Muenzing	8.40	\$435.00	\$3,654.00
Kenneth Kansa	8.80	\$1,325.00	\$11,660.00
Charlotte Underwood	2.60	\$1,160.00	\$3,016.00
Carrie M. Raver	6.60	\$1,045.00	\$6,897.00
TOTALS	39.50		\$33,472.00

Other Charges:

01/12/26 Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USBC-TX-PAY - 01/07/2026 - Notice of Appeal filing - 01/07/2026	298.00	
01/14/26 E-Filing Court Documents - E-Filing documents with Court 01-14-2026	50.00	
01/21/26 Michael Nega - Michael Nega - Filing Fees - Mastercard - COURTS/USDC-FL-1 - 01/14/2026 Filing fees for filing PHV. - 01/14/2026	150.00	
	\$	498.00

BARNES & THORNBURG LLP

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Invoice 3535295

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DAVIDEATON@RHDM.COM

February 10, 2026
Trace (Vincent P.) Schmeltz
00101065-00000001

PAYABLE UPON RECEIPT

Fees for Services	\$	33,472.00
Other Charges	\$	498.00
Total This Invoice	\$	33,970.00

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Exhibit B

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURE

The blended hourly rate of the B&T timekeepers who provided services to the Special Committee during the Fifth Interim Fee Period was, in the aggregate, \$707.04 and during the Final Fee Period was, in the aggregate, \$711.69 (the “Debtors’ Blended Rate”).¹

The blended hourly standard rate for B&T’s timekeepers on non-bankruptcy matters during the twelve-month period from January 1, 2025 to and including December 31, 2025 (the “Comparable Period”) was, in the aggregate, \$623.43 (the “Non-Bankruptcy Blended Rate”).²

Category of Timekeeper	Debtors’ Blended Rate for the Fifth Interim Fee Period	Debtors’ Blended Rate for the Final Fee Period	Non-Bankruptcy Blended Rate
Partner	\$899.57	\$901.18	\$783.54
Counsel	\$876.92	\$878.68	\$646.73
Associate	\$495.26	\$495.47	\$481.74
Paraprofessional	\$377.45	\$378.91	\$324.05
Aggregate	\$707.04	\$711.69	\$623.09

¹ B&T calculated the Debtors’ Blended Rate by dividing the total fees billed by B&T timekeepers to the Debtors during the Final Fee Period by the total number of hours billed by such timekeepers on behalf of the Special Committee during such period.

² B&T calculated the Non-Bankruptcy Blended Rate by dividing the total fees billed on non-bankruptcy matters during the Comparable Period by B&T timekeepers with titles matching those of timekeepers who billed during the Final Fee Period by the total number of hours billed on behalf of such clients by such timekeepers during the Comparable period.

Exhibit C

**SUMMARY OF TOTAL FEES AND HOURS BY ATTORNEYS AND PARAPROFESSIONALS
FOR THE FINAL INTERIM FEE PERIOD**

Name	Position with the Applicant	Year Admitted	Department	Average Hourly Rate	Total Hours	Total Compensation
Aaron Gavant	Partner	2009	Restructuring and Bankruptcy	\$882.77	172.7	\$152,445.95
Thomas Haskins	Partner	2005	Litigation	\$795.00	3.8	\$3,021.00
Scott Hulsey	Partner	1995	Litigation	\$980.00	82.8	\$81,153.80
Randal Kaltenmark	Partner	1996	Corporate	\$1,005.79	3.8	\$3,822.00
Kenneth Kansa	Partner	1999	Restructuring and Bankruptcy	\$1,185.97	1,230.20	\$1,459,016.15
Paige (Catherine) Lohse	Partner	2015	Litigation	\$705.44	974.9	\$687,733.00
Kathleen Matsoukas	Partner	2005	Litigation	\$860.69	594.0	\$511,269.60
Scott Pelozza	Partner	2008	Litigation	\$640.00	14.3	\$9,152.00
Carrie Raver	Partner	1999	Litigation	\$951.91	145.4	\$138,426.50
Trace Schmeltz	Partner	1997	Litigation	\$1,000.00	1,138.10	\$1,138,110.00
Catherine Turgeon	Partner	2001	Corporate	\$970.00	1.3	\$1,261.00
Talia Wagner	Partner	2017	Restructuring and Bankruptcy	\$725.00	2.0	\$1,450.00
Dino Wu	Partner	1998	Corporate	\$1,240.00	4.0	\$4,960.00
Ning He	Counsel	2016	Litigation	\$848.94	1,584.20	\$1,344,863.05
Charlotte Underwood	Counsel	2014	Litigation	\$1,044.77	951.0	\$993,598.40
Anna Bninski	Associate	2023	Litigation	\$494.94	715.1	\$353,919.90
Melissa Bonnici	Associate	2025	Litigation	\$430.00	33.7	\$14,491.00
Haley Casper	Associate	2021	Litigation	\$529.99	225.6	\$119,566.00
Joseph Kipp	Associate	2025	Litigation	\$459.49	192.2	\$88,314.00
Karina Loya	Associate	2020	Litigation	\$665.00	2.5	\$1,662.50
Kathleen Mangan	Associate	2025	Litigation	\$453.64	23.5	\$10,660.50
Megha Mathur	Associate	2022	Healthcare	\$480.00	38.1	\$18,288.00
Gabriella Mouriz	Associate	2017	Litigation	\$600.00	15.5	\$9,294.00
Leah O'Farrell	Associate	2021	Restructuring and Bankruptcy	\$622.38	123.5	\$76,864.00
Lydia Parks	Associate	2024	Litigation	\$476.53	520.9	\$248,226.50
Caroline Payne	Associate	2021	Litigation	\$471.95	614.1	\$289,832.20
Kyle Prillaman	Associate	2017	Litigation	\$720.00	37.2	\$26,762.40
Mariana Renke	Associate	2024	Litigation	\$485.00	4.0	\$1,940.00
Charity Seaborn	Associate	2022	Labor & Employment	\$480.00	31.4	\$15,072.00
Addison Smith	Associate	2020	Litigation	\$590.00	28.0	\$16,520.00
Kevin Warren	Associate	2024	Litigation	\$450.22	289.1	\$130,167.20

Name	Position with the Applicant	Year Admitted	Department	Average Hourly Rate	Total Hours	Total Compensation
Mariah Whitner	Associate	2021	Litigation	\$590.00	19.5	\$11,505.00
Abigail Wissel	Associate	2025	Restructuring and Bankruptcy	\$391.71	21.0	\$8,226.00
Kelly Muenzing	Paralegal	N/A	Litigation	\$435.00	33.2	\$14,442.00
Kathleen Murphy	Paralegal	N/A	Litigation	\$315.27	37.0	\$11,665.00
Anita Peterson	Paralegal	N/A	Litigation	\$400.22	919.5	\$368,012.10
Elisabeth Carpenter	Law Clerk	N/A	Litigation	\$300.00	5.0	\$1,500.00
David Bartholomew	Graphic Artist	N/A		\$310.63	7.1	\$2,205.50
Eric Beard	Discovery Solutions Manager	N/A	Legal Operations	\$292.30	7.4	\$2,163.00
Darlene Gilliam	Discovery Solutions Technician	N/A	Legal Operations	\$190.00	0.4	\$76.00
Christopher Long	Discovery Solutions Project Analyst	N/A	Legal Operations	\$270.00	20.1	\$5,418.90
Janelle Peters	Discovery Solutions Project Coordinator	N/A	Legal Operations	\$275.81	27.6	\$7,620.50
Glenn de Roziere	Investigator	N/A	Litigation	\$385.00	8.4	\$3,234.00
Debbie Standridge	Discovery Solutions Project Analyst	N/A	Legal Operations	\$265.00	7.4	\$1,966.30
Joseph Tate	Director of eDiscovery	N/A	Legal Operations	\$380.00	6.1	\$2,318.00

CERTIFICATE OF SERVICE

I certify that on February 27, 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.

Vincent P. (Trace) Schmeltz III

/s/ Vincent P. (Trace) Schmeltz III

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

In re:

RHODIUM ENCORE LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-90448 (ARP)

Jointly Administered

**FINAL ORDER ALLOWING COMPENSATION
AND REIMBURSEMENT OF EXPENSES
(Docket No. ___)**

The Court has considered the *Fifth and Final Fee Application of Barnes & Thornburg LLP as Counsel to the Special Committee of the Rhodium Enterprises, Inc. Board of Directors for the Fee Period from August 24, 2024 through January 14, 2026* (the “Application”) filed by Barnes & Thornburg LLP (the “Applicant”). The Court orders:

1. Applicant is allowed compensation and reimbursement of expenses allowed in the amount of \$8,648,860.12 for the period set forth in the Application.
2. The compensation and reimbursement of expenses allowed in this Order and all previous interim allowances of compensation and reimbursement of expenses are approved on a final basis.
3. The Debtors are authorized to disburse any unpaid amounts allowed by paragraphs 1 or 2 of this Order.

¹ The Special Committee 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 Special Committee in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

Dated: _____, 2026

Alfredo R. Pérez
United States Bankruptcy Judge