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8 **UNITED STATES BANKRUPTCY COURT**
9 **DISTRICT OF NEVADA**

11 In re
12 Front Sight Management LLC,
13 Debtor.

Case No. 22-11824-abl
Chapter 11

Hearing Date: October 24, 2022
Hearing Time: 9:30 a.m.

19
20 **AMENDED**
21 **FIRST INTERIM APPLICATION OF BG LAW LLP, AS BANKRUPTCY COUNSEL FOR**
22 **SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES**

SUMMARY COVER SHEET

1	Fee Application:	First Interim Application
2	Applicant:	BG Law LLP
3	Capacity:	Bankruptcy Counsel to Chapter 11 Debtor in
4		Possession
5	Debtor:	Front Sight Management LLC
6	Covered Period:	May 24, 2022–August 31, 2022
7	Petition Date:	May 24, 2022
8	Retention Date:	April 12, 2022
9	Date of Order Approving Employment:	June 30, 2022 [ECF No. 224]
10	Previous Fees and Costs Requested:	\$0
11	First Interim Fees Requested:	\$577,955.50 ¹
12	First Interim Costs Requested:	\$13,580.22
13	Total Fees and Costs Requested:	\$591,535.72
14	Fees and Costs Paid Per Interim Comp. Order:	\$357,847.69 ²
15	Number of Hours:	919
16	Blended Rate:	\$628.90
17	Summary of Fees By Professionals:	See Exhibits 1-2 hereto
18	Summary of Fees By Task Codes:	See Exhibits 1-3 hereto
19	Summary of Expenses By Type:	See Exhibit 4 hereto
20	Number of Professionals Included:	9
21	Number of Professionals Billing Less Than 15 Hrs:	3

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26 ¹ BG's fees of \$577,955.50 reflect a voluntary write-off in the amount of \$10,158.00.

27 ² On August 15, 2022, BG served its second monthly fee statement for the period August 1, 2022
28 through August 31, 2022. If there are no objections to BG's second monthly fee statement, on
October 1, 2022, BG will receive an additional \$108,225.89 pursuant to the interim compensation
order entered in this case [ECF No. 318] (the "Interim Compensation Order").

1 BG Law LLP (“BG”), bankruptcy counsel to Front Sight Management LLC (the “Debtor”) in
2 its chapter 11 bankruptcy case, hereby submits its first interim application (the “Application”) for
3 services rendered and expenses incurred during the pendency of this chapter 11 case, for the Period
4 May 24, 2022 through and including August 31, 2022 (the “Covered Period”), pursuant to Sections³
5 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016. This
6 Application is based upon the following Memorandum of Points and Authorities, the concurrently
7 filed declarations of Steven T. Gubner (the “Gubner Declaration”) and Ignatius Piazza (the “Piazza
8 Declaration”), and the papers and pleadings filed in this chapter 11 case, judicial notice of which is
9 respectfully requested pursuant to Rule 201 of the Federal Rules of Evidence.

10 In support of the Application, BG respectfully represents as follows:

11 **I. INTRODUCTION**

12 1. As discussed below, the professional services performed by BG during the Covered
13 Period were necessary and appropriate to the administration of this chapter 11 case and were in the
14 best interests of the Debtor and its estate. Compensation for the below described services is
15 commensurate with the complexity, importance, and nature of the problems, issues, and tasks
16 involved in this chapter 11 case. BG has assisted the Debtor with, among other things, obtaining
17 DIP financing over the vigorous objections of several creditors and the Office of the United States
18 Trustee, employing several professionals to assist the Debtor as it continues to operate its business,
19 preparing several emergency first day motions so that the Debtor could continue to operate its
20 business, formulating a chapter 11 plan and disclosure statement (and multiple amendments thereto),
21 analyzing claims filed against the Debtor and preparing objections thereto, and assisting the Debtor
22 in its ongoing litigation with Las Vegas Development Fund LLC (“LVDF”).

23 2. BG respectfully submits that the services for which it seeks compensation and the
24 expenditures for which it seeks reimbursement in this Application were necessary for and beneficial
25 to the Debtor’s orderly administration of its estate and its rehabilitation and reorganization efforts.

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27 ³ All references to “Section” herein shall be to the Bankruptcy Code appearing in Title 11 of the U.S.
28 Code; all references to a “Bankruptcy Rule” shall refer to the Federal Rules of Bankruptcy
Procedure; and all references to a “Local Rule” shall refer to the Local Rules of Bankruptcy Practice
of the U.S. District Court for the District of Nevada.

1 BG further submits that the compensation requested herein is reasonable in light of the nature,
2 extent, and value of such services to the Debtor, its estate, and all parties-in-interest, and thus
3 approval of the Application is warranted.

4 **II. DISCLOSURES PURSUANT TO BANKRUPTCY RULE 2016**

- 5 3. Name of Applicant: BG Law LLP.
- 6 4. Type of Services Rendered: General bankruptcy counsel to the Debtor.
- 7 5. Covered Period: May 24, 2022 through August 31, 2022.
- 8 6. Date of Filing of Petition: May 24, 2022.
- 9 7. Date of Entry of Order Approving BG's Employment: June 30, 2022 [ECF No. 224],
10 effective as of May 24, 2022.
- 11 8. Date of Filing of Last Fee and Expense Application: Not Applicable.
- 12 9. Total Amount of Fees and Costs Previously Requested and Approved by the Court to
13 Date Pursuant to Prior Approved Fee Applications: None.
- 14 a) Retainer received prior to the Petition Date: \$150,077.50.
- 15 b) Retainer remaining (unapplied) as of the date of this Application: None.
- 16 c) Total amount requested in all prior applications: Not Applicable.
- 17 d) Total amount actually paid pursuant to prior approved applications: Not
18 Applicable.
- 19 e) Total amount currently due but unpaid pursuant to prior approved applications:
20 Not Applicable.
- 21 f) Total amount allowed but reserved pending final application: Not Applicable.
- 22 10. Total fees and costs paid pursuant to the Interim Compensation Order: \$357,847.69.⁴
- 23 11. Summary of Requested Fees for the Covered Period: **Exhibit 1** is the Billing
24 Statements for the Covered Period. **Exhibit 2** is the Monthly Summary of Fees sorted by Activity
25 Code. **Exhibit 3** is the Timekeeper Summary of Fees sorted by Activity Code.
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27 ⁴ On August 15, 2022, BG served its second monthly fee statement for the period August 1, 2022
28 through August 31, 2022. If there are no objections to BG's second monthly fee statement, on
October 1, 2022, BG will receive an additional \$108,225.89 pursuant to the Interim Compensation
Order [ECF No. 318].

1 12. The hourly rates cited herein are the same rates charged by BG professionals for non-
2 bankruptcy services.

3 13. TOTAL FEES REQUESTED FOR THE COVERED PERIOD IN THIS
4 APPLICATION: **\$577,955.50.**⁵

5 14. Total Hours Expended by BG as set Forth in this Application: 919.

6 15. Blended Hourly Rate: \$628.90.

7 16. Summary of Requested Expense Reimbursement for the Covered Period: *See*
8 **Exhibit 4** attached hereto and incorporated herein by this reference.

9 17. TOTAL EXPENSE REIMBURSEMENT REQUESTED IN THIS APPLICATION:
10 **\$13,580.22.**

11 18. Narrative Statement of Services Rendered and Expenses Incurred: *See infra.*

12 19. Identification of Professionals Rendering Service: Attached hereto as **Exhibit 5** are
13 the resumes of BG professionals who rendered services for this bankruptcy case.

14 **III. JURISDICTION AND VENUE**

15 20. This Court has jurisdiction over this case and this matter pursuant to 28 U.S.C. §§ 157
16 and 1334.

17 21. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A).

18 22. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409(a).

19 23. The statutory basis for the relief requested herein are Sections 327, 330, 331, 1107
20 and 1108 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016.

21 24. Pursuant to Local Rule 9014.2, BG consents to entry of a final order or judgment by
22 the bankruptcy judge if it is determined that the bankruptcy judge, absent consent of the parties,
23 cannot enter final orders for judgment consistent with Article III of the U.S. Constitution.

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⁵ BG's fees of \$577,955.50 reflect a voluntary write-off in the amount of \$10,158.00.

1 **IV. SUMMARY OF COMPENSATION FOR PROFESSIONAL SERVICES AND**
2 **ESTATE FUNDS**

3 25. BG requests allowance of fees and expenses for services as general bankruptcy
4 counsel to the Debtor incurred during the pendency of this chapter 11 case for the period May 24,
5 2022 through and including August 31, 2022, in the following amounts: (1) fees in the amount of
6 \$577,955.50, which amount reflects a voluntary write-off in the amount of \$10,158.00; and (2)
7 expenses in the amount of \$13,580.22, for total fees and expenses of \$591,535.72.

8 26. BG entered into no agreement and made no understanding, formal or otherwise, with
9 any person or entity concerning the sharing of compensation to be received, except as among the
10 principals of BG.

11 27. To date, the following administrative expenses have accrued, in addition to those of
12 BG:

- 13 • Province, LLC (the Debtor’s financial advisor): \$582,131.57 of which \$333,993.77 has
14 been paid.
- 15 • Kelley Drye & Warren LLP (Committee counsel): \$485,175.37 of which \$311,998.17
16 has been paid.
- 17 • Carlyon Cica CHTD. \$84,515.76 of which \$56,866.11 has been paid.
- 18 • Dundon Advisors LLC \$114,167.00 of which \$92,361.00 has been paid.

19 **V. BRIEF NARRATIVE HISTORY OF DEBTOR’S BANKRUPTCY CASE**

20 **A. Background Information**

21 28. On May 24, 2022 (the “Petition Date”), the Debtor filed a voluntary petition for relief
22 under chapter 11 of the Bankruptcy Code. The Debtor continues to operate its business and manage
23 its affairs as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
24 No trustee or examiner has been appointed in this case. On June 9, 2022, the Official Committee of
25 Unsecured Creditors (the “Committee”) was appointed by the Office of the United States Trustee
26 (“US Trustee”) pursuant to section 1102 of the Bankruptcy Code.

27 29. The Debtor was originally formed as a California business and operated near
28 Bakersfield, California from its formation in 1996 until 2002. In 1998, the Debtor purchased real

1 property located at 1 Front Sight Road, Pahrump, Nevada 89061 (the “Front Sight Property”) and
2 began building what is now the finest and largest private firearms training facility in the world.

3 30. The Front Sight Property is accessed by a four-mile, two lane paved road, and is
4 currently comprised of 50 outdoor firearms training ranges, live fire tactical training simulators, an
5 8,000 square foot classroom and pro shop, and assorted accessory buildings, bathrooms, three water
6 wells and thousands of square yards of completed grading for future development (the “Front Sight
7 Firearms Facility”).

8 31. The Debtor provides firearms training courses which promote the defensive use of
9 various firearms. Courses are offered to the general public, members of law enforcement and
10 military members. The Front Sight Firearms Facility is the most successful of its type in the United
11 States. The Debtor provides classes and instruction annually to upward of 40,000 gun and weapons
12 enthusiasts. The Debtor is considered the leader in its field and provides additional training and
13 instruction for numerous city and state agencies seeking to improve performance of their respective
14 law enforcement departments. Over the last 25 years, the Debtor has trained a million students and
15 currently has approximately 263,000 members.

16 32. Historically, the Debtor has operated its business by selling lifetime memberships,
17 courses and ancillary products. The Debtor’s business model centered around a major expansion
18 plan that was intended to build the Front Sight Vacation Club & Resort (vacation residences, a RV
19 park, etc.), a retail area adjacent to the vacation club and a pavilion. The Debtor’s intent was that the
20 discounted lifetime memberships and other promotional benefits (like “Front Sight bucks” [money to
21 be used on limited items at Front Sight], certificates [to be used for 2 day or 4-day training courses],
22 etc.) would lead to a “captive” customer base that would be more likely to take advantage of the
23 Vacation Club & Resort which would then bring increased revenue to the Debtor.

24 **B. Circumstances Impacting the Debtor’s Operations and Reason for the**
25 **Bankruptcy Filing**

26 33. The primary factor that precipitated the filing of this case arose out of Debtor’s pre-
27 petition business dealings with LVDF. As discussed above, the Debtor’s business model centered
28 around a major expansion plan that was intended to build the Project. With that goal in mind, the

1 Debtor began researching its financing options. Financing from traditional banks was largely
2 unavailable to the Debtor due to its business centering around the use of firearms.

3 34. In 2012, the Debtor was approached by Robert W. Dziubla (“Dziubla”) and John
4 Fleming (“Fleming”), doing business as LVDF, who represented themselves as like-minded, pro-gun
5 patriots who told the Debtor that they would be able to obtain a financing package for the Debtor to
6 raise up to \$150 million (at a low interest rate) to build and bring to market, among other things, the
7 Vacation Club & Resort. The Debtor initially declined the Dziubla, Fleming and LVDF offer twice.
8 Dziubla and Fleming persisted and represented to the Debtor that due to their vast experience raising
9 foreign investments, their personal connections in China, and their desire to help the Debtor
10 complete its development, that they could raise the necessary funds within a year.

11 35. After months of solicitation, the Debtor accepted Dziubla’s and Fleming’s proposal.
12 The Debtor paid the requested \$300,000 in fees to secure approval from the USCIS to market the
13 EB-5 investment project. Instead of taking a year as promised to secure the USCIS approval, it took
14 over two years. The Debtor paid the aforementioned \$100,000 in marketing fees, as well as another
15 \$120,000 in marketing fees, but the promised funding never materialized.

16 36. Four years later, in 2016, Dziubla and Fleming represented that they had secured the
17 first \$2.5 million in investor funding, and had hundreds of investors in a pipeline to invest in the
18 construction project, but needed to execute a construction loan document to start the flow of
19 investment money. In October of 2016, after three months of negotiating a construction loan
20 agreement (“CLA”), the Debtor entered into the CLA LVDF with the expectation that \$75 million in
21 funding would follow shortly thereafter. However, LVDF produced only \$6.375 million dollars in
22 funding over the next two years, all of which was used by the Debtor under the parameters of the
23 CLA. During this time period, the Debtor paid the interest payments on the money every month on
24 time and in full until September 2021.

25 37. To sum up a very complex history, Dziubla, Fleming and LVDF defaulted on their
26 obligations, failed to raise the funds necessary to complete the Vacation Club & Resort, and
27 litigation was commenced by the Debtor against Dziubla, Fleming, LVDF and related affiliates
28 (collectively, the “LVDF Parties”) in August of 2018, styled *Front Sight Management, LLC v. Las*

1 *Vegas Development Fund LLC et al.*, Case No. A-18-781084-B, which, on the Petition Date, was
2 pending in the Eighth Judicial District Court in Clark County, Nevada (the “LVDF Litigation”). In
3 the LVDF Litigation, the Debtor asserts claims for, among other things, fraud in the inducement,
4 intentional misrepresentation, breach of fiduciary duty and conversion against the LVDF Parties.
5 Dziubla, Fleming, and LVDF then filed a fraudulent foreclosure action against the Debtor. The
6 judge in the LVDF Litigation initially placed a temporary restraining order on the foreclosure action
7 which was lifted shortly before the Petition Date due to the Debtor’s inability to obtain a bond.

8 38. The LVDF Litigation has been pending for nearly four years, and shortly before the
9 Petition Date, the LVDF Parties filed a notice of foreclosure against the Front Sight Property.

10 39. Because (i) the Vacation Club & Resort and related project had not yet materialized,
11 (ii) the Debtor’s ability to obtain traditional financing to complete the construction was impossible
12 while the LVDF Litigation was pending and (iii) a foreclosure sale was imminent, the Debtor was
13 forced to seek bankruptcy protection.

14 C. Significant Events During the Bankruptcy Case

15 40. The following is a list of significant events which have occurred during this case.

16 1. First Day Motions.

17 41. The Debtor’s and BG’s efforts during the early part of this case focused on obtaining
18 authority to, among other things, secure debtor-in-possession financing, maintain certain prepetition
19 accounts, honor and continue certain customers programs, and pay pre-petition wages, salaries, and
20 other compensation, which were each critical elements of the continuation of the Debtor’s business
21 operations.

22 42. **Maintain Prepetition Accounts.** On the Petition Date, the Debtor filed its
23 *Emergency Motion for Order Authorizing Maintenance of Certain Prepetition Bank Accounts and*
24 *Merchant Accounts and Cash Management System* [ECF No. 7] (the “Maintain Prepetition Accounts
25 Motion”). On May 26, 2022, the US Trustee filed an opposition to the Maintain Prepetition
26 Accounts Motion [ECF No. 31]. The Court entered its interim order granting the Maintain
27 Prepetition Accounts Motion on June 2, 2022 [ECF No. 81], and a final order granting the Maintain
28 Prepetition Accounts Motion on August 5, 2022 [ECF No. 317].

1 43. **Honor Customer Programs.** On the Petition Date, the Debtor filed its *Emergency*
2 *Motion for Entry Order of an Order Authorizing the Debtor to Honor and Continue Certain*
3 *Customer Programs and Customer Obligations in the Ordinary Course of Business* [ECF No. 13]
4 (the “Honor Customer Programs Motion”). The Court entered its final order granting the Honor
5 Customer Programs Motion on June 17, 2022 [ECF No. 141].

6 44. **Wage Motion.** On the Petition Date, the Debtor filed its *Emergency Motion for*
7 *Entry of an Order: (1) Authorizing, But Not Requiring, Debtor to Pay or Honor (A) Prepetition*
8 *Wages, Salaries, and Other Compensation Including Reimbursement of Expenses and (B)*
9 *Prepetition Medical, Workers’ Compensation, Paid Time Off, and Similar Benefits; and (2)*
10 *Authorizing and Directing Applicable Banks and Other Financial Institutions to Receive, Process,*
11 *Honor, and Pay Checks Presented for Payment and to Honor Fund Transfer Requests* [ECF No. 9]
12 (the “Wage Motion”). On May 26, 2022, the US Trustee filed an opposition to the Wage Motion
13 [ECF No. 31]. On May 31, 2022, the Court entered a final order granting the Wage Motion [ECF
14 No. 50].

15 2. **DIP Financing and Cash Collateral.**

16 45. Pre-petition, the Debtor did not have sufficient available sources of working capital
17 and financing to carry out the operation of its business and fund a chapter 11 reorganization, thus,
18 the Debtor determined that it was necessary to enter into a postpetition financing agreement with
19 lender FS DIP, LLC (“FS DIP”). On May 24, 2022, the Debtor filed its *Emergency Motion For*
20 *Entry Of Interim And Final Orders: (I) Authorizing The Debtor To Obtain Postpetition Financing,*
21 *(II) Granting Priming Liens And Administrative Expense Claims, (III) Authorizing The Debtor’s Use*
22 *of Cash Collateral, (IV) Modifying the Automatic Stay, And (V) Granting Related Relief* [ECF No. 4]
23 (the “DIP Motion”) pursuant to which it sought to obtain postpetition financing (“DIP Financing”)
24 from FS DIP. The US Trustee objected to the DIP Motion [ECF Nos. 31, 117]. LVDF objected to
25 the DIP Motion [ECF Nos. 35, 121]. Bankgroup Financial Services objected to the DIP Motion
26 [ECF No. 125]. The Committee filed a limited objection to the DIP Motion [ECF No. 147]. The
27 DIP Motion was granted on an interim basis pursuant to Court order entered on May 31, 2022 [ECF
28 No. 59], and on a final basis pursuant to Court order entered on July 1, 2022 [ECF No. 228] (the

1 “DIP Final Order”). The DIP Final Order authorizes the Debtor to borrow up to \$5 million from FS
2 DIP, and authorizes the Debtor to operate within a budget approved by FS DIP for a 13-week period
3 beginning in the week commencing June 27, 2022, subject to extension by agreement between the
4 Debtor and FS DIP.

5 **3. The Debtor’s Employment of Professionals.**

6 46. On May 24, 2022, the Debtor filed its *Emergency Application for the Entry of an*
7 *Order Authorizing the Debtor to Employ and Retain Stretto as Claims, Noticing and Solicitation*
8 *Agent* [ECF Nos. 10, 18] (the “Stretto Application”). The US Trustee objected to the Stretto
9 Application [ECF No. 31]. The Stretto Application was approved pursuant to Court order entered on
10 June 1, 2022 [ECF No. 64].

11 47. On May 27, 2022, the Debtor filed its *Application to Employ BG Law LLP as*
12 *General Bankruptcy Counsel Effective Nunc Pro Tunc to May 24, 2022* [ECF No. 42] (“BG
13 Application”). The US Trustee objected to the BG Application [ECF No. 128]. The BG Application
14 was approved pursuant to Court order entered on June 30, 2022 [ECF No. 224].

15 48. On May 31, 2022, the Debtor filed its *Application to Employ Province, LLC as*
16 *Financial Advisor Pursuant to 11 U.S.C. §§ 327(a) and 330 Nunc Pro Tunc to the Petition Date*
17 [ECF No. 60] (the “Province Application”). The US Trustee objected to the Province Application
18 [ECF No. 142]. The Province Application was approved pursuant to Court order entered on June 30,
19 2022 [ECF No. 225].

20 49. On June 27, 2022, the Debtor filed its *Application to Employ Lucas Horsfall, LLC as*
21 *Accountant Pursuant to 11 U.S.C. §§ 327(a), 328(a) and 330 Effective as of the Petition Date* [ECF
22 No. 200] (the “Lucas Application”). The Lucas Application was approved pursuant to Court order
23 entered on August 24, 2022 [ECF No. 326].

24 50. On August 29, 2022, Debtor filed an application to employ Greenberg Traurig, LLP
25 [ECF No. 329]. On September 16, 2022, the US Trustee filed an objection to the employment
26 application [ECF No. 349]. On September 23, 2022, the Debtor filed its reply [ECF No. 360] to the
27 US Trustee’s objection. The hearing on this application is set for September 30, 2022.
28

1 51. On June 27, 2022, the Debtor filed its *Motion to Entry of Order Establishing*
2 *Procedure for Interim Compensation and Reimbursement of Expenses for Professionals* [ECF No.
3 202] (the “Interim Compensation Motion”). Through the Interim Compensation Motion, the Debtor
4 requested that the Court establish certain procedures for interim compensation of the Debtor’s and
5 the Committee’s professionals. The Interim Compensation Motion was granted pursuant to Court
6 order entered on August 5, 2022 [ECF No. 318].

7 **4. Motion to Appoint Examiner.**

8 52. On June 27, 2022, LVDF filed a motion to appoint an examiner [ECF No. 211] (the
9 “Examiner Motion”). On July 11, 2022, the Debtor filed an opposition [ECF No. 254] to the
10 Examiner Motion and the Committee filed an opposition [ECF No. 255]. On September 15, 2022,
11 the Court entered an order denying the Examiner Motion [ECF No. 347].

12 **5. Motion to Terminate Stay**

13 53. On June 27, 2022, LVDF filed a motion to terminate the automatic stay to continue
14 prosecution of its counterclaims in the LVDF Litigation, including the fraudulent transfer claims
15 [ECF No. 206] (the “RFS Motion”). On July 11, 2022, the Debtor filed an opposition to the RFS
16 Motion [ECF No. 253], as did the Committee [ECF No. 254]. At the oral ruling on the RFS Motion
17 held on September 9, 2022, the Court found that LVDF’s counterclaims in the LVDF Litigation are
18 property of the bankruptcy estate. On September 15, 2022, the Court entered an order denying the
19 RFS Motion [ECF No. 346].

20 **6. Plan and Disclosure Statement**

21 54. Under the Final DIP Order, the Debtor was required to file a chapter 11 plan by July
22 15, 2022, and the Debtor filed an initial plan and disclosure statement on July 15, 2022 [ECF Nos.
23 270 and 271]. On September 9, 2022, the Debtor filed its *First Amended Chapter 11 Plan of*
24 *Reorganization Dated September 9, 2022* [ECF No. 337] and related disclosure statement [ECF No.
25 338]. The hearing on the Debtor’s disclosure statement is currently set for September 30, 2022 [ECF
26 No. 344].

1 **7. Legal Proceedings**

2 55. **The LVDF Litigation and Subsequent Removal.** As referenced above, LVDF
3 asserts counterclaims against the Debtor in the LVDF Litigation. As of the Petition Date, the Debtor
4 contended that the counterclaims were property of the estate as they are premised on either: (i) the
5 Debtor’s principal being the alter ego of the Debtor; or (ii) allegations that the Debtor made
6 fraudulent transfers to certain non-debtor affiliated entities.

7 56. On May 12, 2022, LVDF filed a motion for terminating sanctions (the “Terminating
8 Sanctions Motion”) in the LVDF Litigation, which was set for hearing on May 25, 2022, i.e., after
9 the Petition Date. The Terminating Sanctions Motion was based on the Debtor’s and the Non-
10 Debtor Entities’ failure to appear for their depositions. Through the Terminating Sanctions Motion,
11 LVDF requested that the state court strike the Debtor’s operative complaint and enter judgment in
12 favor of LVDF on the Debtor’s claims, and strike the answers and affirmative defenses to LVDF’s
13 counterclaims filed by the non-debtor affiliates, including on the fraudulent transfer claims.

14 57. Notwithstanding the Debtor’s bankruptcy filing, postpetition on June 22, 2022, the
15 state court entered its *Order Granting in Part Defendants and Counterclaimant’s Motion for Case*
16 *Dispositive Sanctions* (the “Terminating Sanctions Order”) against the non-debtor entities. The
17 Debtor asserted that each of LVDF’s counterclaims was property of the estate, and upon the filing of
18 the Debtor’s bankruptcy petition, LVDF was divested of standing to prosecute such claims and
19 continued prosecution by LVDF was a violation of the automatic stay.

20 58. Accordingly, on June 23, 2022, the Debtor removed the LVDF Litigation to the
21 Bankruptcy Court, commencing adversary proceeding no. 22-01116-abl (the “Adversary
22 Proceeding”).

23 59. On June 27, 2022, LVDF filed a motion to remand the LVDF Litigation to the state
24 court [Adv. ECF No. 4] (the “Remand Motion”) On July 11, 2022, the Debtor filed an opposition to
25 the Remand Motion [Adv. ECF No. 57], and the Committee filed an opposition as well [Adv. ECF
26 No. 63]. On September 15, 2022, the Court entered an order denying the Remand Motion [Adv.
27 ECF No. 107].
28

1 60. On July 5, 2022, the Debtor filed its motion for confirmation that LVDF violated the
 2 automatic stay by obtaining entry of a terminating sanctions order postpetition in the LVDF
 3 Litigation or, in the alternative, for relief from the terminating sanctions order pursuant to Rule 60(b)
 4 of the Federal Rules of Civil Procedure [Adv. ECF Nos. 43 and amended motion Adv. ECF No. 51]
 5 (the “Stay Violation Motion”). The hearing on the Stay Violation Motion was held on September 1,
 6 2022. Given the Court’s oral ruling on the RFS Motion that LVDF’s counterclaims are property of
 7 the bankruptcy estate, the Debtor and LVDF entered into a stipulation resolving the Stay Violation
 8 Motion, which stipulation was approved by the Court [Adv. ECF No. 106]. Pursuant to the
 9 stipulation [Adv. ECF No. 104], the Terminating Sanctions Order and any other oral ruling made by
 10 the state court judge in connection thereto are void ab initio.

11 61. **Objections to Claims.** The bar date for filing proofs of claim in this case was
 12 August 8, 2022 [ECF No. 82]. As of the date this Application, 331 proofs of claim have been filed.
 13 The Debtor and its professionals are in the process of reviewing the claims and determining which
 14 claims are objectionable. However, the Debtor will be filing an objection to LVDF’s claim and a
 15 compliant for avoidance of lien and objection to claim to Michael Meacher’s claim shortly.

16 **VI. STATEMENT OF SERVICES RENDERED AND TIME EXPENDED**

17 **A. Asset Analysis and Recovery (Task Code 100).**

18 62. This category includes the identification and review of potential assets including
 19 causes of action and non-litigation recoveries. Time spent in this category primarily relates to the
 20 analysis and review of potential claims against LVDF for its violation of the automatic stay and time
 21 spent corresponding with City National Bank regarding turnover of a \$100,000 CD.

22 63. BG spent a total of **8.6** hours and **\$5,381.00** in fees during the Covered Period in the
 23 Asset Analysis category. BG spent approximately 0.93% of its time in this category.

24 **B. Asset Disposition (Task Code 105).**

25 64. This category includes sales, leases, abandonment and related transactional work.
 26 During the Covered Period, time was spent in this category relating to negotiating and drafting an
 27 asset purchase agreement with FS DIP, LLC.
 28

1 65. BG spent a total of 7.5 hours and \$4,830.50 in fees during the Covered Period in the
2 Asset Disposition category. BG spent approximately 0.82% of its time in this category.

3 **C. Business Operations (Task Code 110).**

4 66. This category includes issues related to the Debtor operating in chapter 11. During
5 the Covered Period, BG worked closely with the Debtor's principals and professionals in connection
6 with overseeing business operations and various other operational and procedural issues.

7 67. BG devoted time to conferring with the Debtor and its professionals in connection
8 with preparing and filing first day motions, including the Maintain Prepetition Accounts Motion, the
9 Honor Customer Programs Motion, the Wage Motion, and a critical vendor motion. The majority of
10 the Debtor's first day motions were opposed, and BG spent significant time preparing responses to
11 the oppositions and conferring with US Trustee and the Committee regarding the oppositions. Time
12 spent in this category also relates to the Debtor's continued use of its cash management system.

13 68. Additionally, BG spent time in this category conferring with Greenberg Traurig, LLP
14 regarding restructuring the Debtor's memberships going forward.

15 69. BG spent a total of 83.6 hours and \$57,512.50 in fees during the Covered Period in
16 the Business Operations category. BG spent approximately 9.10% of its time in this category.

17 **D. General Case Administration (Task Code 115).**

18 70. This category includes general case administration and the activities described below.
19 During the Covered Period, BG dealt with administrative issues concerning the estate, preparation of
20 the Debtor's schedules and statement of financial affairs (including a motion to extend the original
21 deadline and a motion to establish procedures for providing notice in this case), as well as
22 preparation and filing of all documents to complete the initial compliance due to the US Trustee.

23 71. BG also assisted the Debtor in preparing the documents ordinary and usual in a
24 chapter 11 case. Services in this category also relate to assisting the Debtor in preparing and filing
25 its monthly operating reports and related debtor in possession banking issues as well as
26 communicating with counsel for the US Trustee regarding compliance issues. BG also spent time in
27 this category related to the Debtor's prepetition bank accounts being converted to collateralized
28 debtor in possession accounts.

1 72. During the Covered Period, BG conferred with the Debtor's principal and officers
2 regarding administrative matters, including issues pertaining to the Debtor's members. BG also
3 spent time in the category drafting correspondence to the Debtor's members regarding the Debtor's
4 chapter 11 case.

5 73. BG spent time in this category attending the Initial Debtor Interview.

6 74. BG prepared and filed chapter 11 status report and attended the status conference
7 ordered by the Court.

8 75. BG spent time in the category preparing an opposition to the Examiner Motion and
9 attending the hearing.

10 76. BG spent time in this category preparing pro hac vice applications for some of its
11 attorneys.

12 77. BG spent a total of **123.7** hours and **\$84,934.50** in fees during the Covered Period in
13 the Case Administration category. BG spent approximately 13.5% of its time in this category during
14 the Covered Period.

15 **E. Claims Administration (Task Code 120).**

16 78. This category includes specific claim inquiries, analysis, objections and allowances of
17 claims. During the Covered Period, BG reviewed and analyzed certain scheduled and filed claims,
18 and corresponded with claimants regarding their claims. BG spent time in this category analyzing
19 LVDF's claim and preparing on objection to LVDF's claim.

20 79. BG spent time in this category preparing motions for Bankruptcy Rule 2004
21 examinations of LVDF, Dziubla, Michael Meacher and Dianne Meacher and the related subpoenas
22 in connection with preparing objections to their claims. BG also spent time in this category
23 corresponding with counsel for LVDF and counsel for the Meachers regarding the Bankruptcy Rule
24 2004 examinations. BG also spent time conferring with the Committee regarding the Bankruptcy
25 Rule 2004 examinations. BG spent time in this category responding to a motion to quash the
26 subpoenas filed by LVDF.

27 80. BG spent time in this category preparing for and conducting a Bankruptcy Rule 2004
28 examination of Dianne Meacher.

1 81. BG spent time in this category reviewing all claims and identifying which claims
2 need to be objected to. BG also spent time in this category reviewing and revising multiple claim
3 charts prepared by Stretto and modified by the Debtor's financial advisor.

4 82. BG spent a total of **140.9** hours and **\$85,354.00** in fees during the Covered Period in
5 the Claims Administration category. BG spent less than 15.33% of its time in this category.

6 **F. Fee/Employment Applications (Task Code 130).**

7 83. This category relates to employment of professionals by the estate as well as time
8 relating to requests for compensation and reimbursement of expenses by professionals. BG's
9 employment was approved pursuant to order of this Court entered on June 30, 2022. During the
10 Covered Period, BG prepared its employment application, the Debtor's application to employ
11 Province, LLC as Financial Advisor, the Debtor's application to employ Lucas Horsfall as
12 accountant, the Debtor's application to employ Greenberg Traurig, LLP, and the Debtor's
13 application to employ Stretto as the claims and noticing agent.

14 84. BG spent time in this category preparing the Interim Compensation Motion.

15 85. BG also devoted time to preparing monthly fee statements pursuant to the Interim
16 Compensation Motion and reviewing the other professionals' monthly fee statements.

17 86. BG spent a total of **62.4** hours and **\$29,673.50** in fees during the Covered Period in
18 the Fee / Employment Application category. BG spent approximately 6.79% of its time in this
19 category.

20 **G. Fee/Employment Objections (Task Code 135).**

21 87. This category relates to time spent preparing responses to objections to employment
22 applications. During the Covered Period, BG prepared responses to the US Trustee's objections to
23 BG's employment application, Province, LLC's employment application, and Lucas Horsfall's
24 employment application.

25 88. BG spent a total of **11.4** hours and **\$5,687.00** in fees during the Covered Period in this
26 category. BG spent approximately 1.24% of its time in this category.

27
28

1 **H. Financing (Task Code 140).**

2 89. This category relates to financing matters under Sections 361, 363 and 364 of the
3 Bankruptcy Code, including cash collateral, DIP Financing, secured claims, loan document analysis
4 and loan document drafting. During the Covered Period, BG provided services to the Debtor in
5 connection with contested DIP Financing, and reviewing and revising loan documentation related to
6 its DIP Financing. BG also spent time in the category conferring with the DIP lender regarding
7 access to the Front Sight Property to conduct a survey.

8 90. BG's efforts in this category primarily relate to its work related to DIP Financing.
9 BG spent time in this category drafting and preparing the DIP Financing motion, and reviewing and
10 revising related loan documents. Time spent in this category includes reviewing and responding to
11 the numerous objections to DIP Financing filed by the US Trustee, LVDF, and Michael Meacher.
12 Time in this category also relates to appearing at multiple hearings on DIP Financing and to drafting
13 the accompanying orders. BG spent time in this category responding to requests by LVDF and the
14 Committee for documents and information in connection with the contested DIP Financing motion.

15 91. BG spent time in this category reviewing and revising multiple budgets and cash flow
16 projections prepared by the Debtor and Province, LLC.

17 92. BG also spent time in this category related to exit financing and/or alternative
18 financing.

19 93. BG spent a total of **78.0** hours and **\$55,074.00** in fees during the Covered Period in
20 the Financing category. BG spent approximately 8.49% of its time in this category.

21 **I. Meeting of Creditors (Task Code 160).**

22 94. This category relates to the preparation for and attendance at the 341(a) meeting.

23 95. BG spent a total of **13.8** hours and **\$12,329.00** in fees during the Covered Period in
24 the Meeting of Creditors category. BG spent 1.5% of its time in this category.

25 **J. Plan and Disclosure Statement (Task Code 170).**

26 96. This category relates to the preparation of the Debtor's chapter 11 plan of
27 reorganization and related disclosure statement. BG spent significant time in this category
28 strategizing with the Debtor and financial advisor regarding the Debtor's chapter 11 plan. BG also

1 spent time conferring with the Committee regarding the terms of the Debtor's chapter 11 plan. BG
2 drafted the initial version of the plan and disclosure statement, and then two separate (and very
3 different) versions of the Debtor's first amended chapter 11 plan and disclosure statement. Prior to
4 reaching a deal with an affiliate of FS DIP on plan terms, the Debtor intended to propose a very
5 different plan (which ultimately had feasibility issues).

6 97. BG spent time in this category analyzing and researching the treatment of certain
7 claims under the Debtor's chapter 11 plan, including the treatment of the Debtor's members. BG
8 also spent time in this category relating to plan classification and distributions issues.

9 98. BG spent time in this category relating to prospective equity investors and/or partners
10 including the review of proposed term sheets.

11 99. Time spent in this category also relates to obtaining exit financing.

12 100. BG spent a total of **144.8** hours and **\$97,522.00** in fees during the Covered Period in
13 the Plan and Disclosure Statement category. BG spent approximately 15.76% of its time in
14 this category.

15 **K. Relief from Stay (Task Code 180).**

16 101. This category relates the termination or continuation of the automatic stay under
17 Section 362 of the Bankruptcy Code. During the Covered Period, BG drafted and filed an
18 opposition to the RFS Motion.

19 102. BG spent a total of **20.1** hours and **\$14,453.50** in fees during the Covered Period in
20 the Relief from Stay category. BG spent approximately 2.19% of its time in this category.

21 **L. Litigation – General (Task Code Lit).**

22 103. The Litigation category relates to all services rendered regarding LVDF's motions for
23 Bankruptcy Rule 2004 examinations of the Debtor and the Non-Debtor Affiliates. During the
24 Covered Period, BG drafted and filed an opposition to LVDF's motions for Bankruptcy Rule 2004
25 examinations of the Debtor and the Non-Debtor Affiliates. This category also includes time that
26 overlaps with some of the other categories, including time spent assisting the Debtor with the LVDF
27 Litigation and preparing objections to LVDF's claim and Michael Meacher's claim.
28

1 104. BG spent a total of **42.5** hours and **\$17,414.00** in fees during the Covered Period in
2 the Litigation category. BG spent approximately 4.62% of its time in this category.

3 **M. Front Sight v. Las Vegas Development Fund (Removed Action) – (Task Code**
4 **01).**

5 105. This category relates to the LVDF Litigation and removed action. BG spent time
6 analyzing and researching whether LVDF's counterclaims were property of the Debtor's estate,
7 whether LVDF violated the automatic stay, and whether the Terminating Sanctions Motion was
8 void. BG spent time drafting multiple correspondence to LVDF's counsel regarding LVDF's stay
9 violations.

10 106. BG spent time in the category drafting the notice of removal and gathering and
11 organizing all pleadings filed in the LVDF Litigation for filing in this Court.

12 107. BG spent time in this category responding to the Remand Motion and attending the
13 hearing on the motion. BG spent time in this category reviewing motions filed by the Non-Debtor
14 Affiliates and the Committee in the Removed Action.

15 108. BG spent time in this category preparing the Stay Violation Motion, preparing
16 responses to the oppositions to the Stay Violation Motion, and attending the hearing on the motion.
17 BG also spent time preparing a response to a Bankruptcy Rule 9011 motion served on BG by
18 LVDF's bankruptcy counsel.

19 109. BG spent a total of **162.7** hours and **\$93,235.00** in fees during the Covered Period in
20 this category. BG spent approximately 17.70% of its time in this category.

21 **N. Objection to LVDF Claim – (Task Code 02).**

22 110. This category relates to services rendered by BG in connection with preparing an
23 objection to LVDF's claim (and overlaps with time spent in Task Code 120 – Claims
24 Administration).

25 111. BG spent a total of **20.2** hours and **\$14,889.00** in fees during the Covered Period in
26 this category. BG spent approximately 2.2% of its time in this category.

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1 **O. Meacher Claim Objection – (Task Code 04).**

2 112. This category relates to services rendered by BG in connection with conducting the
3 Bankruptcy Rule 2004 examination of Dianne Meacher (and overlaps with time spent in Task Code
4 120 – Claims Administration).

5 113. BG spent a total of **4.4** hours and **\$1,878.00** in fees during the Covered Period in this
6 category. BG spent approximately 0.5% of its time in this category.

7 **VII. INFORMATION REGARDING BG'S REIMBURSABLE EXPENSES**

8 114. Included in the **Exhibit 5** incorporated herein by this reference is a summary
9 of all expenses incurred in connection with BG's representation of the Debtor during the Covered
10 Period.

11 115. BG's request for reimbursement of expenses herein includes costs advanced in the
12 total amount of \$13,580.22 for reproduction, prints, scans, filing fees, research, and other out-of-
13 pocket costs and expenses necessarily incurred on behalf of the Debtor. BG makes every effort to
14 limit the expenditure of expenses and to use the most economical means available for accomplishing
15 the tasks requiring expenditure of costs.

16 116. BG regularly charges \$0.20 cents per page for in-house photocopying, scans and
17 prints, which represents BG's estimate of its actual cost for these services for the machines, supplies
18 and extra labor associated therewith. The number of photocopies, scans and prints is recorded each
19 time these are made. BG uses outside copying services that charge reasonable rates for large
20 projects when necessary and economical. Such costs are passed on to the client at the amounts
21 actually charged to BG.

22 117. BG charges \$1.00 per page for sending facsimiles, but does not charge for receiving
23 facsimile transmissions. This amount reflects BG's calculation of its actual expenses for the
24 machines, supplies and extra labor expense associated with sending facsimile transmissions and is
25 reasonable in relation to the amounts charged by outside vendors who provide these services.

26 118. BG charges for postage expenses incurred for mailing notices to creditors, serving
27 pleadings, and sending general correspondences in representing the Debtor. Attorney service,
28 messenger and overnight delivery services are used only when necessary, and BG attempts to avoid

1 extra charges for messenger and overnight delivery expenses when information can be transmitted
2 by other means, such as mail, e-mail or facsimile. BG attempts to use the least expensive services
3 available consistent with obtaining delivery within the time required and posts actual charges
4 incurred for these services to clients' accounts.

5 119. Computer research service expenses are passed on to the client at the actual cost
6 incurred by BG. Parking expenses and mileage are passed on to the client at the actual cost incurred
7 by BG.

8 **VIII. CONCLUSION**

9 Based on the foregoing, BG respectfully requests that the Court enter an order: (i) approving
10 the Application; (ii) allowing on an interim basis fees in the amount of **\$577,955.50** and expenses in
11 the amount of **\$13,580.22** for a total amount of **\$591,535.72**; (iii) instructing the Debtor to pay the
12 balance between the allowed amount of fees and expenses minus the amount(s) that have been paid
13 to BG pursuant to the Interim Compensation Order; and (iv) for such other and further relief as this
14 Court deems just and proper.

15 DATED: September 23, 2022

BG Law LLP

17 By: /s/ Steven T. Gubner
18 Steven T. Gubner
19 Susan K. Seflin
20 Jessica S. Wellington
21 Attorneys for Chapter 11 Debtor and
22 Debtor in Possession
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EXHIBIT 1



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
EXHIBIT 1 - FEES FOR PROFESSIONAL SERVICES RENDERED					
[5890.002] Front Sight Management Ch. 11 BK 22-11824					
<u>[100] Asset Analysis & Recovery</u>					
5/27/2022	JLB	Analysis of sealed documents.	0.4	\$575.00	\$230.00
6/1/2022	SKS	Review appraisal and documents related to water rights for assessment of collateral [.9]	0.9	\$675.00	\$607.50
6/2/2022	JLB	Analysis of stay violation issues related to state court litigation and potentially seeking sanctions in light of same	0.6	\$575.00	\$345.00
6/6/2022	SKS	Review email request from Greg Garman regarding LVDF stay violation in state court [.1]; draft response [.6] and gather documents regarding the same [.2].	0.9	\$675.00	\$607.50
6/23/2022	JT	Initial review of claim estimate issues [.2]; and S. Gubner email re 2004 motion [.1]	0.3	\$270.00	\$81.00
6/28/2022	JBK	Research standard for appointment of examiner (2.1); research standing of creditors with respect to fraudulent transfer claims (1.9)	4.1	\$675.00	\$2,767.50
6/29/2022	JLB	Analysis of issues re Rule 2004 exam necessity	0.3	\$0.00	No Charge
7/5/2022	SKS	Review correspondence from Andrea Gandara regarding turnover of CD from City National bank and prepare correspondence (multiple) regarding same [.6]	0.6	\$675.00	\$405.00
7/6/2022	SKS	Conversation with Andrea Gandara regarding turnover of \$100,000 CD being held by City National Bank and regarding turnover of credit card overpayment [.5]	0.5	\$675.00	\$337.50
Subtotal [100] Asset Analysis & Recovery			8.6		\$5,381.00
<u>[105] Asset Disposition</u>					
6/7/2022	STG	Review APA provided by the DIP lender.	1.4	\$895.00	\$1,253.00
6/8/2022	SKS	Revise asset purchase agreement with Westwind [2.1]	2.1	\$675.00	\$1,417.50
6/12/2022	SKS	Review emails (multiple) from Sam Schwartz regarding APA [.2]; draft correspondence regarding the same [.1]	0.3	\$675.00	\$202.50
6/12/2022	SKS	Review redline to Westwind asset purchase agreement [.3]	0.3	\$675.00	\$202.50
6/13/2022	SKS	Conversation with Sam Schwartz regarding revisions to asset purchase agreement [1.3]	1.3	\$675.00	\$877.50
6/14/2022	SKS	Review further redline to APA from Bryan Lindsey [.3]; further revise APA [.1]; draft correspondence to Bryan Lindsey regarding same [.1]	0.5	\$675.00	\$337.50



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6/15/2022	SKS	Conversation with lender's counsel regarding further revisions to purchase agreement [.5]	0.5	\$675.00	\$337.50
6/15/2022	SKS	Further revise draft APA [.3]	0.3	\$675.00	\$202.50
7/26/2022	JSW	Strategize re outcome of hearings on 7/25/22 and next steps	0.8	\$0.00	No Charge
Subtotal [105] Asset Disposition			7.5		\$4,830.50

[110] Business Operations

5/24/2022	SKS	Draft Piazza omnibus declaration in support of first day motions [1.2]	1.2	\$675.00	\$810.00
5/24/2022	JSW	Prepare Piazza omnibus declaration in support of first day motions	1.3	\$395.00	\$513.50
5/24/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding information needed for first day filings [.7]	0.7	\$675.00	\$472.50
5/24/2022	SKS	Revise critical vendor motion and exhibits [.6]	0.6	\$675.00	\$405.00
5/24/2022	JSW	Analysis of issues re first day motions	1.0	\$395.00	\$395.00
5/24/2022	SKS	Revise customer obligation motion [.5]	0.5	\$675.00	\$337.50
5/24/2022	JSW	Further strategize re first day motions	0.8	\$395.00	\$316.00
5/24/2022	JSW	Edit limir notice motion	0.7	\$395.00	\$276.50
5/24/2022	SKS	Conversations (multiple) with Ed McDonald regarding first day emergency motions [.4]	0.4	\$675.00	\$270.00
5/24/2022	SKS	Draft application for order shortening time to hear first day emergency motions [.4]	0.4	\$675.00	\$270.00
5/24/2022	SKS	Revise cash management motion [.3]	0.3	\$675.00	\$202.50
5/24/2022	JSW	Revise critical vendor motion	0.4	\$395.00	\$158.00
5/24/2022	SKS	Conversations with court clerk regarding emergency petition filing [.2]	0.2	\$675.00	\$135.00
5/24/2022	JSW	Edit wage motion	0.3	\$395.00	\$118.50
5/24/2022	JSW	Edit cash management motion	0.2	\$395.00	\$79.00
5/25/2022	SKS	Review emails (multiple) from counsel for LVDF regarding first day hearings [.3]; prepare emails regarding same [.4]	0.7	\$675.00	\$472.50
5/25/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding first day motions and case filing [.5]	0.5	\$675.00	\$337.50



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5/25/2022	SKS	Conversations (multiple) with Tanner James regarding issues related to funding [.3]	0.3	\$675.00	\$202.50
5/25/2022	JSW	Draft notice of hearing on first day motions	0.3	\$395.00	\$118.50
5/25/2022	JSW	Call to chambers re obtaining hearing on first day motions [.1]; strategize re the same and next steps [.2]	0.3	\$395.00	\$118.50
5/25/2022	SKS	Draft notice of emergency hearings [.1]	0.1	\$675.00	\$67.50
5/25/2022	JSW	Call with Stretto re order granting ex parte application re first day motions	0.1	\$395.00	\$39.50
5/25/2022	JSW	Strategize re docketing errors for first day motions	0.1	\$395.00	\$39.50
5/25/2022	JSW	Review Court's entered order granting ex parte application for hearing on shortened time re first day motions	0.1	\$395.00	\$39.50
5/26/2022	STG	Telephone conference with client (mult) [.5]; Telephone conference with opposing counsel and prepare for same [.8]; prepare for first day Motions [1.9]	3.2	\$895.00	\$2,864.00
5/26/2022	SKS	Prepare for hearings on first day emergency motions [2.8]	2.8	\$675.00	\$1,890.00
5/26/2022	SKS	Draft supplemental Piazza declaration in support of first day motions [1.6]	1.6	\$675.00	\$1,080.00
5/26/2022	SKS	Conversation with Paul Huygens regarding addressing UST objections to first day motions [.6]	0.6	\$675.00	\$405.00
5/26/2022	JSW	Draft supplemental declaration of Piazza in support of first day motions	0.8	\$395.00	\$316.00
5/26/2022	SKS	Review UST omnibus objection to first day motions [.3]	0.3	\$675.00	\$202.50
5/26/2022	JSW	Review US Trustee's objections to the First Day motions	0.4	\$395.00	\$158.00
5/26/2022	JSW	Strategize re supplemental declaration of Piazza in support of first day motions	0.1	\$395.00	\$39.50
5/27/2022	STG	Prepared for hearing on all 9 first day motions [3.9]; attend Hearing on First Day Motions [7.4]	11.3	\$895.00	\$10,113.50
5/27/2022	SKS	Appear at hearing on first day emergency motions [6.8]	6.8	\$675.00	\$4,590.00
5/27/2022	SKS	Prepare for hearings on first day emergency motions [1.4]	1.4	\$675.00	\$945.00
5/27/2022	SKS	Draft wage order [.5]	0.5	\$675.00	\$337.50
5/27/2022	JLB	Analysis of issues re outcome on first day hearing, strategy re next steps	0.3	\$575.00	\$172.50



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5/27/2022	SKS	Prepare correspondence to opposing counsel regarding proposed wage order [.1]	0.1	\$675.00	\$67.50
5/28/2022	SKS	Revise wage order [.1]	0.1	\$675.00	\$67.50
5/31/2022	SKS	Draft interim cash management order [.8]	0.8	\$675.00	\$540.00
5/31/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding cash management order [.3]	0.3	\$675.00	\$202.50
5/31/2022	SKS	Review entered wage order [.1]; draft correspondence to client regarding same [.1]	0.2	\$675.00	\$135.00
6/1/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding issues related to payroll [.7]	0.7	\$675.00	\$472.50
6/1/2022	JSW	Review transcript from hearing on DIP motion re preparing supplement thereto	1.1	\$395.00	\$434.50
6/1/2022	SKS	Further revise cash management order per Ed McDonald's comments [.2]	0.2	\$675.00	\$135.00
6/1/2022	SKS	Draft correspondence to Ed McDonald, Sam Schwartz and Brian Shapiro regarding revised cash management order and review correspondence regarding same [.1]	0.1	\$675.00	\$67.50
6/2/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding payroll, business operations, etc [.7]	0.7	\$675.00	\$472.50
6/2/2022	JLB	Analysis of 2004 exam motions by LVDF filed despite email correspondence re same	0.5	\$575.00	\$287.50
6/2/2022	JLB	Revise omnibus opposition to Rule 2004 exam motions filed by LVDF	0.4	\$575.00	\$230.00
6/2/2022	JLB	Strategize re opposition to Rule 2004 exam motions by LVDF	0.4	\$575.00	\$230.00
6/2/2022	JLB	Strategize re additional arguments to be made in opposition to Rule 2004 motions by LVDF	0.3	\$575.00	\$172.50
6/2/2022	JLB	Finalize omnibus opposition to Rule 2004 motions by LVDF	0.2	\$575.00	\$115.00
6/2/2022	JLB	Revise Seflin declaration in support of omnibus opposition re Rule 2004 exams by LVDF	0.1	\$575.00	\$57.50
6/2/2022	JLB	Strategize re responding to 2004 motions by LVDF	0.4	\$0.00	No Charge
6/3/2022	STG	Review orders submitted and subpoenas related 2004 filed by LVDF (.8);analysis of issues regarding response (.9).	1.7	\$895.00	\$1,521.50
6/3/2022	SKS	Conversations (multiple) with Robert Klamser from Stretto regarding creditor issues [.9]	0.9	\$675.00	\$607.50



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6/3/2022	JSW	Draft supplemental declaration of financial advisor in support of DIP Financing Motion	0.7	\$395.00	\$276.50
6/4/2022	STG	Telephone conference with FA [.5]; analyse scope of subpoenas and areas of focus on declaration and production response to same and final hearing on first day Motions [1.4]	1.9	\$895.00	\$1,700.50
6/14/2022	SKS	Conversation with Bob LeHane regarding various issues relating to first day motions and committee request for a further extension of response deadline [.6]	0.6	\$675.00	\$405.00
6/16/2022	YD	Analysis of documents and Transcripts of First Day Motions and format same for S. Gubner Declaration.	0.2	\$280.00	\$56.00
6/17/2022	JT	Prepare declaration of I. Piazza re statements made at the hearing on first day motions [.3], revise same [.8]	1.1	\$270.00	\$297.00
6/17/2022	JT	Initial review of hearing on first day motions, analysis of client emails re preparing declaration	0.3	\$270.00	\$81.00
6/20/2022	SKS	Draft Ignatius omnibus declaration regarding remaining first day emergency motions [2.2]	2.2	\$675.00	\$1,485.00
6/20/2022	SKS	Further revise Piazza declaration in support of remaining first day emergency motions [1.0]	1.0	\$675.00	\$675.00
6/24/2022	STG	Prepared for and attend final hearing on First day Motions.	4.4	\$895.00	\$3,938.00
6/24/2022	SKS	Appear at final hearings on first day emergency motions [2.7]	2.7	\$675.00	\$1,822.50
6/24/2022	JSW	Research validity of state court order entered on day of removal of action to bankruptcy court [.5]; strategize re the same [.5]	1.0	\$395.00	\$395.00
6/27/2022	STG	Prepared for and attend Cont Final Hearing on First Day Motions (shortened time): Motion re Post-Petition Financing, Admin Expense, Cash Collateral, Automatic Stay and Relief.	1.4	\$895.00	\$1,253.00
6/27/2022	SKS	Appear at hearings on BG and Province employment applications and chapter 11 status conference [1.5]	1.5	\$675.00	\$1,012.50
7/8/2022	SKS	Conversation with Bob Miller regarding continuing operations and whether Front Sight will be open in October [.3]	0.3	\$675.00	\$202.50
7/15/2022	SKS	Conversation with proposed membership counsel regarding terms of membership agreements [.2]	0.2	\$675.00	\$135.00
7/22/2022	SKS	Conversation with Stanley Prouser regarding membership and related issues [.4]	0.4	\$675.00	\$270.00
7/22/2022	SKS	Conversation with Ed McDonald regarding Bank of America pre-petition account and closing account [.1]	0.1	\$675.00	\$67.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/23/2022	SKS	Conversation with Ignatius Piazza regarding membership terms [.6]	0.6	\$675.00	\$405.00
7/24/2022	JT	Review email from Stan Prousser forwarding Front Sight documents for review, forward to S. Sefflin re responding	0.1	\$0.00	No Charge
7/25/2022	STG	Discuss business operations with client (.5).	0.5	\$895.00	\$447.50
7/26/2022	SKS	Review member emails and documents regarding post bankruptcy treatment of memberships [1.3]	1.3	\$675.00	\$877.50
7/26/2022	SKS	Prepare correspondence (multiple) to Teresa Pilatowicz regarding membership terms [.3]	0.3	\$675.00	\$202.50
8/2/2022	SKS	Prepare correspondence to membership attorney regarding terms of membership agreements [.4]	0.4	\$675.00	\$270.00
8/2/2022	SKS	Conversation with Tanner James regarding terms of membership agreements [.2]	0.2	\$675.00	\$135.00
8/4/2022	SKS	Conference call with proposed membership attorneys, Ignatius Piazza, etc. regarding terms of membership agreement [.9]	0.9	\$675.00	\$607.50
8/4/2022	SKS	Review documents and correspondence from client regarding terms of new membership agreements [.8]	0.8	\$675.00	\$540.00
8/4/2022	JSW	Conference call with Greenberg Traurig regarding new membership plan [.8]; analysis of issues regarding the new membership plan [.2]	1.0	\$395.00	\$395.00
8/4/2022	JSW	Analysis of proposed terms for memberships going forward	0.2	\$395.00	\$79.00
8/7/2022	SKS	Conversation with Ignatius Piazza regarding membership structure [.2]	0.2	\$675.00	\$135.00
8/20/2022	SKS	Review proposed draft of emails to members regarding membership options and revise [1.6]	1.6	\$675.00	\$1,080.00
8/21/2022	SKS	Review and revise proposed email to members regarding membership terms [1.4]	1.4	\$675.00	\$945.00
8/21/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding proposed email to member regarding change in terms and related issues [1.2]	1.2	\$675.00	\$810.00
8/24/2022	SKS	Review emails (multiple) from client regarding member survey and prepare emails regarding same [.5]	0.5	\$675.00	\$337.50
8/25/2022	SKS	Review correspondence (multiple) from Ty Kehoe regarding various questions relating to daily fees and membership and prepare emails (multiple) regarding same [1.3]	1.3	\$675.00	\$877.50
8/25/2022	JLB	Analysis of issues re Bank of America account and need for closure of same	0.3	\$575.00	\$172.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
Subtotal [110] Business Operations			83.6		\$57,512.50
<u>[115] Case Administration</u>					
5/24/2022	JSW	Draft notice of stay of proceedings	0.6	\$395.00	\$237.00
5/24/2022	JSW	Edit motion to extend deadlines to file schedules and SOFA	0.3	\$395.00	\$118.50
5/24/2022	JSW	Revise pro hac vice application	0.1	\$395.00	\$39.50
5/24/2022	JSW	Revise OST re First Day Motions	0.1	\$395.00	\$39.50
5/25/2022	STG	Telephone conference with client (mult) [1.2];	1.2	\$895.00	\$1,074.00
5/25/2022	JSW	Research whether continuation of fraudulent conveyance claims violates the automatic stay	1.0	\$395.00	\$395.00
5/25/2022	SKS	Draft correspondence to Ignatius Piazza regarding IDI and 341a meeting and case requirements [.5]	0.5	\$675.00	\$337.50
5/25/2022	JSW	Strategize re potential removal of state court action	0.7	\$395.00	\$276.50
5/25/2022	SKS	Review correspondence from UST regarding IDI and requirements [.2]	0.2	\$675.00	\$135.00
5/25/2022	SKS	Coordinate with Stretto to confirm service of first day emergency motions per OST [.2]	0.2	\$675.00	\$135.00
5/25/2022	JSW	Strategize re next steps in light of state court's ruling today in the state court litigation	0.3	\$395.00	\$118.50
5/26/2022	SKS	Research regarding keeping member lists confidential [.9]	0.9	\$675.00	\$607.50
5/26/2022	SKS	Conversation with Jason Blumberg regarding UST objection to limit notice motion [.5]	0.5	\$675.00	\$337.50
5/28/2022	SKS	Review correspondence from Ignatius regarding uncashed checks [.1]; prepare correspondence regarding same [.2]	0.3	\$675.00	\$202.50
5/28/2022	SKS	Draft order extending schedule deadline [.1]	0.1	\$675.00	\$67.50
5/30/2022	SKS	Revise notice procedures per the court's ruling at the hearing [.9]	0.9	\$675.00	\$607.50
5/31/2022	STG	Telephone conference with client re: upcoming dates and status [.5]; review and execute correspondence re: stay violation [.6]	1.1	\$895.00	\$984.50
5/31/2022	SKS	Draft limit notice order [1.3]	1.3	\$675.00	\$877.50
5/31/2022	SKS	Conference call with Stretto regarding form of limit notice order and confidentiality issues [.5]	0.5	\$675.00	\$337.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
5/31/2022	SKS	Prepare correspondence (multiple) to clerk regarding notice of ch 11 bankruptcy filing and review correspondence regarding revising it [.3]	0.3	\$675.00	\$202.50
6/1/2022	STG	Telephone conference with client re: general case issues.	0.5	\$895.00	\$447.50
6/1/2022	SKS	Further revise limit notice order per comments from opposing counsel [.6]	0.6	\$675.00	\$405.00
6/1/2022	SKS	Further revise exhibits to limit notice order per comments from court clerk [.6]	0.6	\$675.00	\$405.00
6/1/2022	SKS	Conversation with Melissa Keeler regarding maintaining pre-petition account with Bank of Texas and converting it [.5]	0.5	\$675.00	\$337.50
6/1/2022	SKS	Conversations (multiple) with Tanner James regarding information and data needed by Stretto [.2]	0.2	\$675.00	\$135.00
6/1/2022	YD	Tel conference David T regarding bankruptcy filing by debtor and refund of deposits and employment of Stretto and Schedules and recontact if no receipt of notices from Stretto.	0.2	\$280.00	\$56.00
6/1/2022	JSW	Review voicemail from Steve Heun re creditor's committee [.1]; strategize re the same [.1]	0.2	\$0.00	No Charge
6/2/2022	JSW	Draft omnibus opposition to LVDF 2004 Motions	1.7	\$395.00	\$671.50
6/2/2022	SKS	Revise UST submission regarding compliance [.8]	0.8	\$675.00	\$540.00
6/2/2022	SKS	Review correspondence and pro forma analysis from Claudia Flores regarding DIP accounts at Bank of Texas and prepare correspondence regarding same [.4]	0.4	\$675.00	\$270.00
6/2/2022	JSW	Further strategize re opposition to 2004 examinations	0.4	\$395.00	\$158.00
6/2/2022	JSW	Draft pro hac vice application for J. Bagdanov [.3]; draft designation of local counsel for J. Bagdanov [.1]	0.4	\$395.00	\$158.00
6/2/2022	SKS	Review entered cash management order [.1]; draft correspondence to Bank of Texas regarding same [.1]	0.2	\$675.00	\$135.00
6/2/2022	JSW	Draft declaration of Susan K. Seflin in support of omnibus opposition to 2004 Motions	0.3	\$395.00	\$118.50
6/2/2022	JSW	Strategize re preparing oppositions to 2004 motions and request for new appraisal	0.3	\$395.00	\$118.50
6/2/2022	JSW	Review correspondence regarding LVDF proceeding with deposition in state court action re stay violation	0.2	\$395.00	\$79.00
6/2/2022	JSW	Review declarations filed in support of LVDF's opposition to Debtor's first day motions re preparing omnibus opposition to 2004 exam motions	0.2	\$395.00	\$79.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/2/2022	SKS	Review correspondence from Cristina Ardis confirming Bank of Texas pre-petition account will be converted to a dip account [.1]	0.1	\$675.00	\$67.50
6/2/2022	JSW	Strategize re preparing pro hac vice application for J. Bagdanov	0.1	\$395.00	\$39.50
6/2/2022	JSW	Call to chambers re opposition to 2004 exam motions	0.1	\$395.00	\$39.50
6/2/2022	RFC	Call with S. Gubner re case and request for assist on motion for Rule 2004 exam	0.1	\$0.00	No Charge
6/3/2022	SKS	Analysis of issues related to confidentiality of law enforcement members [.9]	0.9	\$675.00	\$607.50
6/3/2022	SKS	Conversation with Ed McDonald regarding disclosure and confidentiality issues [.5]	0.5	\$675.00	\$337.50
6/6/2022	SKS	Revise 7 day package form [1.6]	1.6	\$675.00	\$1,080.00
6/6/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding closing of pre-petition accounts and related issues [.6]	0.6	\$675.00	\$405.00
6/6/2022	SKS	Conversation with Rosalee Clasen regarding closing of American First National Bank pre-petition accounts and getting cashiers checks [.6]	0.6	\$675.00	\$405.00
6/6/2022	SKS	Review correspondence from Scott Preston regarding claim against estate and request that the company not contact him directly [.1]; draft response [.2]	0.3	\$675.00	\$202.50
6/6/2022	SKS	Draft authorization for employee to close bank accounts [.3]	0.3	\$675.00	\$202.50
6/7/2022	SKS	Analysis of issues regarding confidentiality of certain members of matrix [.8]	0.8	\$675.00	\$540.00
6/7/2022	SKS	Conversations (multiple) with Ignatius regarding various issues related to scheduling appraisal, banking, etc [.7]	0.7	\$675.00	\$472.50
6/7/2022	SKS	Conversations (multiple) with Adam Fialkowski regarding redacted master mailing list [.5]	0.5	\$675.00	\$337.50
6/7/2022	SKS	Conference call with Paul Huygens and Tanner James regarding issues relating to confidentiality of parties, plan terms, compliance due to UST [.5]	0.5	\$675.00	\$337.50
6/7/2022	SKS	Conversation with Don Krebs regarding membership and bankruptcy filing [.3]	0.3	\$675.00	\$202.50
6/7/2022	SKS	Prepare correspondence to Bank of Texas regarding getting checks for DIP account [.1]; review correspondence regarding same [.1]	0.2	\$675.00	\$135.00
6/7/2022	SKS	Prepare list of equity security holders [.1]	0.1	\$675.00	\$67.50



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/7/2022	JSW	Analysis of issues re notice of incomplete and/or deficient filing	0.3	\$0.00	No Charge
6/8/2022	SKS	Conversations (multiple) with Ed McDonald regarding stipulation to extend time for committee to object to first day motions [.2]	0.2	\$675.00	\$135.00
6/9/2022	SKS	Prepare initial reporting requirements for US Trustee's office [3.1]	3.1	\$675.00	\$2,092.50
6/9/2022	STG	Review committee formation and amended [.1]; review emails from two creditors asking for information [.3]; Telephone conference with client [.4]; Telephone conference with FA [.4]	1.2	\$895.00	\$1,074.00
6/9/2022	SKS	Conversation with Tanner James regarding information and documents needed for UST compliance [.8]	0.8	\$675.00	\$540.00
6/9/2022	SKS	Conversation with Ignatius regarding information needed for UST compliance [.3]	0.3	\$675.00	\$202.50
6/10/2022	STG	Telephone conference with O. Katz re: back ground facts for committee [.5]; review issues on filings with Office of the U.S. Trustee and approve same [1.2]	1.7	\$0.00	No Charge
6/13/2022	STG	Conference call with client about various issues related to case administration [1.1]; Telephone conference with new OCC counsel [.3]	1.4	\$895.00	\$1,253.00
6/13/2022	SKS	Review multiple drafts of schedules and Statement of Financial Affairs [.6]; prepare emails to Stretto regarding comments [.3]	0.9	\$675.00	\$607.50
6/14/2022	STG	Prepare for and attend deep dive with OCC counsel.	1.6	\$895.00	\$1,432.00
6/14/2022	SKS	Conference call with Robert LeHane, Paul Huygens, Steve Gubner etc. regarding getting Committee up to speed, financing, etc. [1.2]	1.2	\$675.00	\$810.00
6/14/2022	SKS	Revise statement of financial affairs [1.2]	1.2	\$675.00	\$810.00
6/14/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding information needed for Statement of Financial Affairs [.7]	0.7	\$675.00	\$472.50
6/15/2022	STG	Discuss with client need for appraiser [.2]; Telephone conference with former appraiser on property (2x) [.3]; Analyse and review statements and schedules before filing [4.4]	4.9	\$895.00	\$4,385.50
6/15/2022	SKS	Revise Schedules multiple times [1.5]	1.5	\$675.00	\$1,012.50
6/15/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding information needed for schedules [1.3]	1.3	\$675.00	\$877.50
6/15/2022	SKS	Revise Statement of Financial Affairs multiple times [1.1]	1.1	\$675.00	\$742.50
6/15/2022	SKS	Conversations (multiple) with Adam and Sean from Stretto regarding additional changes to schedules [.4]	0.4	\$675.00	\$270.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/15/2022	YD	Tel conf with John Cline/Member re Stretto website for information re Case and Status and review of website on same.	0.2	\$280.00	\$56.00
6/16/2022	STG	Review transcript from last hearing [2.9]; review and revise draft of declaration on Piazza in support of final hearing on first day Motions and transmit same [1.2]	4.1	\$895.00	\$3,669.50
6/16/2022	SKS	Attend initial debtor interview [1.2]	1.2	\$675.00	\$810.00
6/20/2022	STG	Analyse issues and review final pleadings filed today in support fo first day Motions [2.9]; Telephone conference with Appraiser [.2]	3.1	\$895.00	\$2,774.50
6/21/2022	SKS	Conversation with Tanner James regarding monthly operating report and exhibits [.7]	0.7	\$675.00	\$472.50
6/21/2022	JT	Further analysis of case status, claims notice and Stretto web site re responding to creditor inquiries	0.6	\$270.00	\$162.00
6/21/2022	JT	Initial review of claims notice, confer with S. Gubner re addressing creditor calls (.2); review docket and case status re creditor inquiries (.3), call with S. Seflin re creditor inquiries (.1)	0.6	\$270.00	\$162.00
6/21/2022	SKS	Review May monthly operating report and exhibits [.1]	0.1	\$675.00	\$67.50
6/22/2022	SKS	Conversation with Cristina Ardis from Bank of Texas regarding confirmation Bank of Texas account was converted to a DIP account [.3]	0.3	\$675.00	\$202.50
6/23/2022	JSW	Strategize re preparing Knudsen motion	0.1	\$395.00	\$39.50
6/23/2022	JT	Review voicemail message from Homer Electric relating to creditor inquiries	0.1	\$270.00	\$27.00
6/24/2022	JT	Respond to emails re 2004 exam and subpoena, review local rules re document request (.4); review L. Prouser email re case information (.1)	0.5	\$270.00	\$135.00
6/24/2022	JLB	Strategy re Rule 2004 for expert	0.2	\$575.00	\$115.00
6/24/2022	JT	Review voice mail from Stan Browser re creditor inquiry, and call back to Mr. Browser providing email contact and Stretto website information	0.2	\$270.00	\$54.00
6/24/2022	JT	Call to Susan at Homer Electric providing email contact information for creditor inquiries	0.1	\$270.00	\$27.00
6/25/2022	SKS	Draft email to members regarding notices they are receiving from Stretto [1.1]	1.1	\$675.00	\$742.50
6/26/2022	SKS	Review emails and screenshots from Ignatius regarding member confusion relating to Stretto emails and prepare correspondence regarding same [.5]	0.5	\$675.00	\$337.50



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/27/2022	SKS	Draft Piazza declaration in support of interim compensation motion [.1]	0.1	\$675.00	\$67.50
6/28/2022	STG	Review Motion for Examiner filed by LVDF.	0.4	\$895.00	\$358.00
6/28/2022	JSW	Strategize re motion to appoint examiner	0.5	\$395.00	\$197.50
6/28/2022	JSW	Further strategize re response to motion to appoint examiner	0.4	\$395.00	\$158.00
6/28/2022	JSW	Analysis of motion for appointment of examiner [.2]; further strategize re the same [.2]	0.4	\$395.00	\$158.00
6/28/2022	JT	Call with Susan at Homer Electric re case inquiries	0.2	\$270.00	\$54.00
6/28/2022	JSW	Strategize re 2004 examination	0.1	\$395.00	\$39.50
6/29/2022	JLB	Strategy re responding to examiner motion in light of DIP hearing result	0.5	\$575.00	\$287.50
6/30/2022	STG	Analyse case strategy and pending motions with client, Garman and Sefflin [1.0]; transmitted documents to UCC and Telephone conference with B. Lehane re: documents and overall case administration [.4]	1.4	\$895.00	\$1,253.00
7/1/2022	JBK	Resarch and draft opposition to request for examiner.	5.3	\$675.00	\$3,577.50
7/1/2022	SKS	Conversation with William Peci regarding claim notice from Stretto and status of case [.2]	0.2	\$675.00	\$135.00
7/3/2022	JBK	Begin researching opposition to motion to appoint examiner [2]; draft the same [2.1].	4.1	\$675.00	\$2,767.50
7/5/2022	JBK	Finalize draft of opposition to motion to appoint examiner.	3.2	\$675.00	\$2,160.00
7/5/2022	STG	Review email from CNB and S. Sefflin response [.2]; analyse issues re: pending motions, oppositions and case issues [.9]	1.1	\$895.00	\$984.50
7/5/2022	JSW	Conference call with S. Gubner re status of case and next steps [.6]; strategize with S. Sefflin re the same [.1]	0.7	\$395.00	\$276.50
7/5/2022	JSW	Edit opposition to motion to appoint examiner	0.3	\$395.00	\$118.50
7/5/2022	JSW	Analysis of issues re opposition to motion to appoint examiner	0.1	\$395.00	\$39.50
7/5/2022	JT	Call with creditor requesting case information	0.1	\$270.00	\$27.00
7/6/2022	SKS	Review correspondence from Aryn Rees regarding forgiveness of second PPP loan [.1]; prepare correspondence to UST regarding same [.2]	0.3	\$675.00	\$202.50
7/6/2022	JLB	Finalize pro hac vice application	0.2	\$575.00	\$115.00
7/6/2022	JT	Review messages from J. White re case information	0.1	\$270.00	\$27.00



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7/7/2022	JBK	Continue researching [1] and drafting opposition to motion appoint examiner [1.7]	2.7	\$675.00	\$1,822.50
7/7/2022	SKS	Revise opposition to motion for appointment of examiner [1.3]	1.3	\$675.00	\$877.50
7/8/2022	STG	Telephone conference with B. Lehane [.4]; review draft opposition to Examiner Motion [.5]	0.9	\$895.00	\$805.50
7/8/2022	JT	Call with S. Prouser re membership and case questions (.2); review email from S. Prouser and email to S. Seflin re same (.2)	0.3	\$270.00	\$81.00
7/10/2022	STG	Review email from UCC counsel and reply re various issues [.2]; multiple Telephone conference with SSeflin re: agreement on simply substitution in as the real party in interest [.4].	0.6	\$895.00	\$537.00
7/11/2022	SKS	Revise opposition to motion for appointment of examiner [.8]	0.8	\$675.00	\$540.00
7/11/2022	STG	Telephone conference with Garman and Huygens re: ongoing issues [.5];	0.5	\$895.00	\$447.50
7/11/2022	SKS	Research regarding appointment of an examiner [.3]	0.3	\$675.00	\$202.50
7/12/2022	STG	Telephone conference with Garman (mult) re various issues re case strategy.	0.4	\$895.00	\$358.00
7/12/2022	JSW	Analysis of issues re preparing pro hac vice application for J. Komorsky	0.1	\$0.00	No Charge
7/13/2022	SKS	Conversations with multiple people from Bank of America regarding converting prepetition bank account to a debtor in possession account [.6]	0.6	\$675.00	\$405.00
7/19/2022	JSW	Analysis of reply to opposition to motion to appoint examiner	0.5	\$395.00	\$197.50
7/20/2022	JSW	Draft status conference report re dispute with LVDF regarding 2004 motions re preparing objection to LVDF's claim	2.3	\$395.00	\$908.50
7/20/2022	SKS	Revise status report for July 25 2022 hearing [.6]	0.6	\$675.00	\$405.00
7/20/2022	JSW	Analysis of issues re pending pro hac vice applications of J. Bagdanov and J. Komorsky	0.1	\$0.00	No Charge
7/21/2022	SKS	Further draft chapter 11 status report for July 25 2022 omnibus hearing [1.1]	1.1	\$675.00	\$742.50
7/21/2022	JBK	Revise letter to opposing counsel regarding 2004 exam (.6); revise status conference statement (.4).	1.0	\$675.00	\$675.00
7/21/2022	SKS	Revise June monthly operating report [.2]	0.2	\$675.00	\$135.00
7/22/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding various issues related to pre-petition bank accounts and cash management motion [.7]	0.7	\$675.00	\$472.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/22/2022	SKS	Draft final cash management order [.4]	0.4	\$675.00	\$270.00
7/24/2022	STG	Review status conference memo and all pleadings	3.6	\$895.00	\$3,222.00
7/25/2022	STG	Prepared for and attend hearings.	3.8	\$895.00	\$3,401.00
7/25/2022	SKS	Appear at omnibus hearing on Knudsen motion, Lucas Horsfall employment application, cash management motion, motion to appoint an examiner, etc [3.6]	3.6	\$675.00	\$2,430.00
7/25/2022	SKS	Prepare for hearing on examiner motion [.9]	0.9	\$675.00	\$607.50
7/25/2022	JSW	Review status report filed by Committee	0.1	\$395.00	\$39.50
7/26/2022	SKS	Review correspondence from Carla Cordero regarding additional compliance requests [.1]; review documents [.4]; prepare correspondence regarding same [.1]	0.6	\$675.00	\$405.00
7/27/2022	STG	Telephone conference with Garman [.2]' review correspondence from Official Committee of Unsecured Creditors and forward to client.[.3].	0.5	\$895.00	\$447.50
7/27/2022	SKS	Conversation with Ed McDonald regarding LVDF's allegations about the committee and top 20 [.5]	0.5	\$675.00	\$337.50
7/27/2022	JT	Review additional emails from S. Prousser	0.1	\$0.00	No Charge
8/4/2022	SKS	Conversation with Aryn Springer regarding various MOR issues [.5]	0.5	\$675.00	\$337.50
8/4/2022	SKS	Revise order on cash management motion [.1]	0.1	\$675.00	\$67.50
8/5/2022	SKS	Review correspondence from court clerk regarding change in omnibus hearing dates [.1]	0.1	\$675.00	\$67.50
8/7/2022	SKS	Draft response to committee counsel and counsel for the UST regarding Brian Shapiro's allegations that the debtor did not accurately schedule claims [2.8]	2.8	\$675.00	\$1,890.00
8/7/2022	STG	Review emails from counsel on claims administration and response thereto ccing Office of the U.S. Trustee .	1.1	\$895.00	\$984.50
8/20/2022	SKS	Review emails (multiple) from client and Chris Gaines regarding merchant accounts and bankruptcy filing and draft correspondence to merchant regarding orders on use of merchant accounts and related issues [.9]	0.9	\$675.00	\$607.50
8/20/2022	STG	Review email correspondence and response re: merchant accounts.	0.2	\$895.00	\$179.00
8/22/2022	STG	Review email correspondence to members [.3]; review and respond to email from Official Committee of Unsecured Creditors counsel [.4].	0.7	\$895.00	\$626.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
8/22/2022	SKS	Prepare July monthly operating report [.5]	0.5	\$675.00	\$337.50
8/23/2022	STG	Conference Call with all hands and Official Committee of Unsecured Creditors.	1.0	\$895.00	\$895.00
8/24/2022	SKS	Review 7 day package in preparation for initial debtor interview [.4]	0.4	\$675.00	\$270.00
8/24/2022	SKS	Review debtor's schedules in preparation for initial debtor review and prepare notes [.4]	0.4	\$675.00	\$270.00
8/25/2022	STG	Review email from Member re: fee alterations (mult) and responses thereto (mult).	0.5	\$895.00	\$447.50
8/30/2022	STG	Review emails from FA on document requests [.4]; Telephone conference with Garmen [.5]	0.9	\$895.00	\$805.50
8/30/2022	JSW	Review correspondence from Committee regarding request for documents [.1]; gather documents re the same [.1]	0.2	\$395.00	\$79.00
Subtotal [115] Case Administration			123.7		\$84,934.50
[120] Claims Admin					
6/6/2022	STG	Review multiple emails from Scott Preston (former counsel).	0.5	\$895.00	\$447.50
6/14/2022	SKS	Review emails (multiple) from Stretto and Province regarding schedules and Statement of Financial Affairs and prepare emails (multiple) regarding same [.7]	0.7	\$675.00	\$472.50
6/21/2022	STG	Review meacher pleadings and release language [1.2]; Telephone conference with S. Roth re: need for EB% expert for purposes of claim evaluation. [.5]	1.7	\$895.00	\$1,521.50
6/23/2022	SKS	Review multiple inquiries from creditors regarding their claims and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
6/27/2022	SKS	Conversation with Timothy Johnson regarding membership v claim [.2]	0.2	\$675.00	\$135.00
6/28/2022	JLB	Strategy re seeking 2004 exam versus subpoena of LVDF parties	0.3	\$575.00	\$172.50
6/29/2022	JLB	Draft motion for Rule 2004 exam of LVDF PMK	0.8	\$575.00	\$460.00
6/29/2022	JLB	Draft document requests for Person Most Knowledgeable of LVDF	0.3	\$575.00	\$172.50
6/29/2022	JLB	Draft subpoena for LVDF re testimony	0.3	\$575.00	\$172.50
6/29/2022	JLB	DRaft proposed order on LVDF 2004 motion	0.2	\$575.00	\$115.00
6/29/2022	JLB	Draft 2004 motion for Dziubla	0.2	\$575.00	\$115.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/29/2022	JLB	Draft proposed order on Dziubla 2004 motion	0.1	\$575.00	\$57.50
6/29/2022	JSW	Edit 2004 requests to LVDF	0.1	\$395.00	\$39.50
6/30/2022	SKS	Review correspondence from William Peci regarding claim and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
6/30/2022	JLB	Further strategy re Rule 2004 exams	0.2	\$575.00	\$115.00
6/30/2022	JT	Tel call with S. Jorgensen re filing claims and claims bar date	0.3	\$270.00	\$81.00
7/5/2022	STG	Revise motion for 2004 on LVDF.	1.4	\$895.00	\$1,253.00
7/5/2022	STG	Telephone conference with Garmin re: meacher claim and review and revise 2004 motion.	1.2	\$895.00	\$1,074.00
7/5/2022	JSW	Review documents related to Meacher's claim re preparing motion for 2004 examination in order to prepare a claim objection	0.4	\$395.00	\$158.00
7/5/2022	JSW	Analysis of issues re 2004 exam of Person Most Knowledgeable of LVDF	0.3	\$395.00	\$118.50
7/5/2022	JSW	Edit motion for 2004 exam of LVDF	0.3	\$395.00	\$118.50
7/5/2022	JSW	Edit 2004 motion re LVDF's claim [.1]; edit document request re the same [.1]	0.2	\$395.00	\$79.00
7/6/2022	STG	Review email re: DIP disclosures and further review of discovery re: claims of LVDF	1.9	\$895.00	\$1,700.50
7/6/2022	JLB	Strategy re finalizing Rule 2004	0.2	\$575.00	\$115.00
7/7/2022	JLB	Revise LVDF Person Most Knowledgeable Rule 2004 motion	0.2	\$575.00	\$115.00
7/7/2022	JLB	Finalize proposed order re 2004 of Dziubla	0.1	\$575.00	\$57.50
7/7/2022	JLB	Finalize proposed order re LVDF Person Most Knowledgeable 2004 exam	0.1	\$575.00	\$57.50
7/7/2022	JLB	Revise Dziubla 2004 motion	0.1	\$575.00	\$57.50
7/11/2022	JT	Call with B. Morrison re errors received when attempting to electronically file his POC (.2); research error message and prepare email to S. Sefflin re resolving same (.2)	0.4	\$270.00	\$108.00
7/11/2022	JT	Receive voice mail from B. Morrison re filing proof of claim, review same	0.1	\$0.00	No Charge
7/12/2022	JSW	Review documents re Meacher's conduct as COO re preparing claim objection.	0.2	\$395.00	\$79.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/12/2022	JSW	Analysis of issues re preparing 2004 exam of Meacher re preparing claim objection	0.2	\$395.00	\$79.00
7/14/2022	SKS	Research regarding validity of Meacher financing statement [.9]	0.9	\$675.00	\$607.50
7/14/2022	JSW	Draft motion for 2004 exam of Meacher [.9]; draft proposed order the same [.1]	1.0	\$395.00	\$395.00
7/14/2022	JSW	Draft document subpoena to Dziubla [.2]; draft testimony subpoena to Dziubla [.2]; draft requests for production re the same [.1]	0.5	\$395.00	\$197.50
7/14/2022	JSW	Analysis of issues re 2004 exams of LVDF and Meacher	0.4	\$395.00	\$158.00
7/14/2022	JSW	Strategize re 2004 exam of Meacher and potential claims against Meacher	0.4	\$395.00	\$158.00
7/14/2022	JSW	Draft motion for 2004 exam of Dianne Meacher [.2]; draft related order [.1]	0.3	\$395.00	\$118.50
7/14/2022	JSW	Draft notice of intent to issue subpoenas to LVDF and Dziubla	0.2	\$395.00	\$79.00
7/14/2022	JSW	Revise document subpoena to LVDF [.1]; revise testimony subpoena to LVDF [.1]	0.2	\$395.00	\$79.00
7/14/2022	JSW	Reivse motion re 2004 exam of Meacher [.1]; revise motion re 2004 exam of Dianne Meacher [.1]	0.2	\$395.00	\$79.00
7/15/2022	STG	Revise supoena and document requests for LVDF.	1.7	\$895.00	\$1,521.50
7/15/2022	JSW	Draft document requests to LVDF re 2004 exam re objection to claim	2.0	\$395.00	\$790.00
7/15/2022	JSW	Draft document requests to Meacher re 2004 exam re objection to claim	1.5	\$395.00	\$592.50
7/15/2022	STG	Review Meacher input from Garman and supoenas [.1] and revise same [.4]	0.5	\$895.00	\$447.50
7/15/2022	JSW	Analysis of issues re 2004 exam and document requests to LVDF and Dziubla	0.5	\$395.00	\$197.50
7/15/2022	JSW	Draft testimony subpoena to Meacher [.1]; draft testimony subpoena to Dianne Meacher [.1]; Draft document subpoena to Meacher [.1]; draft document subpoena to Dainne Meacher [.1]	0.4	\$395.00	\$158.00
7/15/2022	JSW	Analysis of Meacher's unfiled declaration re preparing document requests re claim objection	0.3	\$395.00	\$118.50
7/15/2022	JSW	Draft document requests to Dianne Meacher re 2004 exam re claim objection	0.2	\$395.00	\$79.00
7/15/2022	JSW	Revise document requests to LVDF	0.2	\$395.00	\$79.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/15/2022	JSW	Draft document requests to Dziubla re 2004 exam re objection to claim	0.2	\$395.00	\$79.00
7/15/2022	JSW	Revise notice of intent to issue subpoenas	0.1	\$395.00	\$39.50
7/15/2022	JSW	Review finalized notice of intent to issue subpoenas to LVDF and Dziubla re claim objection	0.1	\$395.00	\$39.50
7/15/2022	JSW	Draft notice of intent to issue subpoenas to the Meachers re objection to claim	0.1	\$395.00	\$39.50
7/15/2022	JSW	Coordinate preparation and service of subpoenas and notice of intent to issue subpoenas	0.3	\$0.00	No Charge
7/18/2022	SKS	Revise Exhibit to Michael Meacher subpoena regarding document requests related to BFS and Meacher claims [.7]	0.7	\$675.00	\$472.50
7/18/2022	SKS	Revise document request to Dianne Meacher regarding Meacher and BFS claim [.6]	0.6	\$675.00	\$405.00
7/18/2022	JSW	Analysis of issue re 2004 examinations of LVDF and the Meachers	0.4	\$395.00	\$158.00
7/18/2022	SKS	Review emails (multiple) from committee counsel regarding inquiries as to 2004 exams of LVDF and Michael Meacher and prepare emails (multiple) regarding same [.2]	0.2	\$675.00	\$135.00
7/18/2022	JSW	Revise document requests to Michael Meacher re objection to claim	0.2	\$395.00	\$79.00
7/18/2022	JSW	Revise subpoena to Michael Meacher [.1]; Revise subpoena to Dianne Meacher [.1]	0.2	\$395.00	\$79.00
7/18/2022	JSW	Strategize re document requests to the Meachers re objecting to claim	0.2	\$395.00	\$79.00
7/18/2022	JSW	Revise document requests to Dianne Meacher re claim objection	0.1	\$395.00	\$39.50
7/18/2022	JSW	Review finalized notice of intent to issue subpoenas to the Meachers	0.1	\$395.00	\$39.50
7/18/2022	JSW	Draft amended subpoena to Dziubla [.1]; coordinate service of the same [.1]	0.2	\$0.00	No Charge
7/18/2022	JSW	Coordinate service of subpoenas on the Meachers and notice of intent to issues subpoenas	0.2	\$0.00	No Charge
7/19/2022	SKS	Conversation with creditor regarding bar date notice and scheduled claim [.4]	0.4	\$675.00	\$270.00
7/19/2022	JSW	Analysis of issues re issues with 2004 examination of LVDF based on their counsel's comments	0.5	\$395.00	\$197.50



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7/20/2022	SKS	Review LVDF loan documents in connection with objection to claim [1.3]	1.3	\$675.00	\$877.50
7/20/2022	SKS	Conference call with Brian Shapiro and Andrea Champion regarding refusal to comply with 2004 order and subpoena relating to LVDF claim [.8]	0.8	\$675.00	\$540.00
7/20/2022	SKS	Review correspondence (multiple) from Andrea Champion regarding LVDF refusal to comply with 2004 motion regarding claim [.7] and prepare correspondence regarding same to client [.1]	0.8	\$675.00	\$540.00
7/20/2022	JSW	Conference call with LVDF's counsel re 2004 examinations and motion to quash subpoenas re preparing claim objection [.8]; analysis of issues re the same [.2]; strategize re the same [.3]	1.3	\$395.00	\$513.50
7/20/2022	JSW	Further strategize re LVDF's refusal to provide documents and witnesses pursuant to the 2004 orders re preparing claim objection	0.5	\$395.00	\$197.50
7/20/2022	JSW	Review correspondence and state court protective orders sent by LVDF's counsel re objection to Subpoenas re preparing objection to LVDF's claim	0.3	\$395.00	\$118.50
7/20/2022	JSW	Strategize re objection to LVDF claim	0.2	\$395.00	\$79.00
7/21/2022	JSW	Draft response to letter from LVDF's counsel re issues with LVDF's compliance with the 2004 Orders [1.5]; edit the same [.2]	1.7	\$395.00	\$671.50
7/21/2022	SKS	Revise letter to Andrea Champion in response to her letter that LVDF will not comply with 2004 orders [.8]	0.8	\$675.00	\$540.00
7/21/2022	JSW	Analysis of issues re LVDF's claim against the Debtor and potential objections to that claim	1.0	\$395.00	\$395.00
7/21/2022	SKS	Conversation with committee counsel Lauren Schlusel regarding update on status of case and dispute with LVDF regarding discovery [.5]	0.5	\$675.00	\$337.50
7/21/2022	YD	Research regarding S. Gubner 2004 Examinations and Claims Objections and Outline on same; and email search results thereof.	1.0	\$280.00	\$280.00
7/21/2022	JSW	Further analysis of potential objections to LVDF's claim	0.5	\$395.00	\$197.50
7/21/2022	JT	Telephone call with Mark Givlin re case inquiry and filing proof of claim [.2], prepare email to M. Givlin re same [.1]	0.3	\$270.00	\$81.00
7/21/2022	JSW	Edit chapter 11 status report re LVDF's failure to comply with the 2004 Orders	0.1	\$395.00	\$39.50



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7/22/2022	JSW	Research re validity of security interest filed under name of dba re objection to Meacher claim [1.1]; strategize re the same and potential claims against Meacher re preparing objection to claim [.6]	1.7	\$395.00	\$671.50
7/22/2022	JSW	Research validity of Consulting Agreement re preparing objection to Meacher claim	0.2	\$395.00	\$79.00
7/22/2022	JSW	Analysis of response to status report filed by LVDF re 2004 exam of LVDF	0.1	\$395.00	\$39.50
7/22/2022	JT	Respond to S. Prouser email re filing claim.	0.1	\$270.00	\$27.00
7/24/2022	SKS	Review correspondence from member regarding proof of claim [.1] and prepare correspondence regarding same [.1]	0.2	\$675.00	\$135.00
7/26/2022	JBK	Begin researching claim objection to LDVF's claim.	1.2	\$675.00	\$810.00
7/26/2022	SKS	Conference call with Tanner James and Teresa Pilatowicz regarding insider asserting claim against the estate [.5]	0.5	\$675.00	\$337.50
7/26/2022	JLB	Strategy re preparation of outline for Rule 2004 exam of Meacher	0.4	\$575.00	\$230.00
7/27/2022	SKS	Research regarding objection to LVDF claim [1.6]	1.6	\$675.00	\$1,080.00
7/27/2022	SKS	Conversation with Earl Roe regarding questions about claim [.5]	0.5	\$675.00	\$337.50
7/27/2022	SKS	Review correspondence from Earl Roe regarding claim [.1]	0.1	\$675.00	\$67.50
7/27/2022	JSW	Review correspondence from Earl Jones re claim against the estate	0.1	\$0.00	No Charge
7/28/2022	JLB	Strategize re objecting to LVDF claims	1.2	\$575.00	\$690.00
7/28/2022	JSW	Draft complaint objecting to Meacher's claim	0.9	\$395.00	\$355.50
7/28/2022	JSW	Analysis of issues re objection to LVDF's claim	0.9	\$395.00	\$355.50
7/28/2022	JSW	Strategize re preparing objection to LVDF's claim and Meacher's claim	0.5	\$395.00	\$197.50
7/28/2022	JLB	Analysis of potential defects in LVDF trust deed	0.3	\$575.00	\$172.50
7/28/2022	SKS	Conversation with committee counsel regarding committee review of LVDF deed of trust [.2]	0.2	\$675.00	\$135.00
7/28/2022	JSW	Call with Matt Stockl re request to continue Meachers' 2004 examinations [.1]; strategize re the same [.1]	0.2	\$395.00	\$79.00
7/28/2022	JLB	Email to committee counsel re LVDF claim	0.1	\$575.00	\$57.50
7/28/2022	JSW	Further analysis of issues re objection to LVDF's claim	0.3	\$0.00	No Charge



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/29/2022	JBK	Draft objection to LVDF claim [5] and research regarding same [2.7]	7.7	\$675.00	\$5,197.50
7/29/2022	STG	Analysis on claims Objections for LVDF and revise draft.	2.4	\$895.00	\$2,148.00
7/29/2022	SKS	Review loan documents, closing statement etc regarding objection to LVDF claim [1.1]; draft memo regarding objection [.3]	1.4	\$675.00	\$945.00
7/29/2022	JLB	Revise draft claim objection re LVDF	0.5	\$575.00	\$287.50
7/29/2022	JLB	Correspondence with Meacher counsel re Rule 2004 exam subpoenas	0.2	\$575.00	\$115.00
7/31/2022	SKS	Review correspondence (multiple) from Jason Komorsky and Jerry Bregman regarding objection to LVDF claim [.4] prepare correspondence (multiple) regarding same [.4]	0.8	\$675.00	\$540.00
7/31/2022	JLB	Strategize re responding to motion to quash filed by LVDF	0.4	\$575.00	\$230.00
8/1/2022	STG	Review emails from client [1.1]; review statement of undisputed facts from state court in relation to claim objection [2.9]; review draft of objection to claim and revise same [1.2]	5.2	\$895.00	\$4,654.00
8/1/2022	SKS	Draft objection to LVDF claim [1.1]	1.1	\$675.00	\$742.50
8/1/2022	JSW	Analysis of motion to quash filed by LVDF and Dziubla and related exhibits	1.4	\$395.00	\$553.00
8/1/2022	JLB	Further review potential issues with LVDF trust deed, related to objecting to claim	0.3	\$575.00	\$172.50
8/1/2022	JLB	Review correspondence with committee counsel re LVDF trust deed issues	0.2	\$575.00	\$115.00
8/1/2022	JLB	Analysis of issues re deadline for responding to LVDF motion to quash	0.2	\$575.00	\$115.00
8/1/2022	JSW	Research re objection to motion to quash	0.2	\$395.00	\$79.00
8/1/2022	JSW	Strategize re objection to motion to quash subpoenas to LVDF and Dziubla	0.1	\$395.00	\$39.50
8/2/2022	SKS	Further draft objection to LVDF claim [3.3]	3.3	\$675.00	\$2,227.50
8/2/2022	JLB	Draft Piazza declaration in support of LVDF claim objection	2.0	\$575.00	\$1,150.00
8/2/2022	SKS	Draft Ignatius declaration in support of LVDF objection to claim [.8]	0.8	\$675.00	\$540.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
8/2/2022	JSW	Analysis of issues re preparing complaint against the Meachers for fraudulent transfer and objection to claim	1.3	\$395.00	\$513.50
8/2/2022	JSW	Research whether state court protective order prohibits disclosure of information in connection with 2004 examination re preparing objection to LVDF's motion to quash	1.0	\$395.00	\$395.00
8/2/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding objection to LVDF claim and information needed [.5]	0.5	\$675.00	\$337.50
8/2/2022	JLB	Analysis of documents related to claims against LVDF, in preparation for drafting Piazza declaration in support of claim objection	0.5	\$575.00	\$287.50
8/2/2022	SKS	Conversation with Greg Garman regarding objection to LVDF claim [.2]	0.2	\$675.00	\$135.00
8/2/2022	JSW	Email to Greg Garman re dates for rescheduled 2004 examinations of Michael Meacher and Dianne Meacher	0.1	\$395.00	\$39.50
8/3/2022	STG	Review letter from member and analyse same.	0.5	\$895.00	\$447.50
8/3/2022	SKS	Review correspondence (multiple) from creditor's counsel regarding claim and prepare correspondence regarding same [.3]	0.3	\$675.00	\$202.50
8/3/2022	JSW	Review correspondence from Andy Fox re proof of claim	0.1	\$395.00	\$39.50
8/7/2022	STG	Review claims filed on Bar date.	3.3	\$895.00	\$2,953.50
8/7/2022	SKS	Review correspondence from Brian Shapiro to UST and Committee regarding certain claims filed and how those claimants should have been scheduled and review correspondence claims [.8]	0.8	\$675.00	\$540.00
8/8/2022	SKS	Conversation with Tanner James regarding claims filed and analysis [.4]	0.4	\$675.00	\$270.00
8/8/2022	SKS	Review LVDF proof of claim and attachments [.2]	0.2	\$675.00	\$135.00
8/8/2022	JSW	Analysis of expert report obtained by Debtor in the underlying state court action re preparing objection to LVDF's claim	0.2	\$395.00	\$79.00
8/10/2022	JSW	Analysis of issues re 2004 examinations of the Meachers	0.2	\$395.00	\$79.00
8/10/2022	JSW	Email to counsel for the Meachers re 2004 examinations	0.1	\$395.00	\$39.50
8/10/2022	JSW	Analysis of LVDF's proof of claim	0.1	\$0.00	No Charge
8/10/2022	JSW	Analysis of Meacher's proof of claim	0.2	\$0.00	No Charge
8/11/2022	STG	Review claims analysis from FA [1.8]; Telephone conference with P. Huygens re: same. [.4]	2.2	\$895.00	\$1,969.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
8/11/2022	JSW	Analysis of issues re continuance of Michael Meacher's 2004 examination	0.2	\$0.00	No Charge
8/12/2022	STG	Confirm date and time for Deposition of Ms Meacher.	0.5	\$895.00	\$447.50
8/12/2022	JSW	Strategize re 2004 examination of Dianne Meacher [.2]; email to Matt Stockl re the same [.1]	0.3	\$395.00	\$118.50
8/15/2022	STG	Telephone conference with Client [.3]; review deposition outline on Meacher wife [2.7]; email to client and counsel [.3]	3.3	\$895.00	\$2,953.50
8/15/2022	JSW	Draft opposition to motion to quash 2004 examinations and subpoenas filed by LVDF [2.4]; research regarding the same [.8]	3.2	\$395.00	\$1,264.00
8/15/2022	JSW	Research regarding LVDF's arguments in motion to quash 2004 exams and subpoenas	1.3	\$395.00	\$513.50
8/15/2022	JSW	Email to Committee's counsel re 2004 examination of Dianne Meacher	0.1	\$395.00	\$39.50
8/15/2022	JSW	Email to David M. Grey re 2004 examination of Dianne Meacher	0.1	\$395.00	\$39.50
8/16/2022	STG	Prepared for Meacher D. Deposition [3.8]; conduct deposition [3.0]; Telephone conference with client [.5]	7.3	\$895.00	\$6,533.50
8/16/2022	JSW	Prepare for 2004 examination of Dianne Meacher [.5]; attend examination [2.9]	3.4	\$395.00	\$1,343.00
8/16/2022	JSW	Prepare notes re 2004 examination of Dianne Meacher	1.0	\$395.00	\$395.00
8/16/2022	JSW	Research whether business communications are subject to the marital privilege re Dianne Meacher 2004 examination	0.7	\$395.00	\$276.50
8/16/2022	JSW	Call with S. Gubner and Dr. Piazza re preparation for 2004 examination of Dianne Meacher	0.5	\$395.00	\$197.50
8/16/2022	JSW	Email to David M. Grey re 2004 exam of Dianne Meacher	0.1	\$395.00	\$39.50
8/17/2022	JSW	Draft opposition to motion to quash	4.2	\$395.00	\$1,659.00
8/17/2022	JSW	Further draft opposition to motion to quash filed by LVDF	2.0	\$395.00	\$790.00
8/17/2022	JSW	Further draft opposition to motion to quash filed by LVDF	1.0	\$395.00	\$395.00
8/17/2022	JSW	Draft declaration of Steven T. Gubner in support of Debtor's opposition to motion to quash	1.0	\$395.00	\$395.00
8/17/2022	JSW	Further draft opposition to motion to quash filed by LVDF	0.6	\$395.00	\$237.00
8/17/2022	JT	Call from D. Simister re refund and notice of bankruptcy filing, email to S. Seflin re same	0.2	\$270.00	\$54.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
8/18/2022	SKS	Review and revise opposition to LVDF and Dziubla motion to quash 2004 exams regarding LVDF claims [1.2]	1.2	\$675.00	\$810.00
8/18/2022	SKS	Conversation with Tanner James regarding claim chart as exhibit for disclosure statement [.5]	0.5	\$675.00	\$337.50
8/18/2022	JSW	Further edit opposition to motion to quash	0.4	\$395.00	\$158.00
8/18/2022	JSW	Edit opposition to motion to quash.	0.2	\$395.00	\$79.00
8/18/2022	JSW	Edit declaration of S. Gubner in support of opposition to motion to quash [.2]	0.2	\$395.00	\$79.00
8/18/2022	JSW	Analysis of issues re 2004 examination of Meacher in light of inability to testify	0.4	\$0.00	No Charge
8/18/2022	JSW	Analysis of issues re opposition to motion to quash	0.2	\$0.00	No Charge
8/18/2022	JSW	Research avoidability of UCC Financing Statement.	0.4	\$0.00	No Charge
8/18/2022	JSW	Analysis of issues re opposition to motion to quash	0.2	\$0.00	No Charge
8/19/2022	JSW	Research avoidability of Meacher's UCC financing statement re preparing complaint	2.5	\$395.00	\$987.50
8/23/2022	STG	Review drafts of LVDF Reply papers.	1.9	\$895.00	\$1,700.50
8/23/2022	SKS	Revise objection to LVDF claim [1.1]	1.1	\$675.00	\$742.50
8/23/2022	JT	Review D. Simister email following up re refund issues, email to S. Seflin re same	0.3	\$270.00	\$81.00
8/25/2022	SKS	Review LVDF reply in support of motion to quash 2004 subpoenas and document production [.3]	0.3	\$0.00	No Charge
8/26/2022	JT	Call from Todd Hutchings at Mobile Mini re payments received for containers at sites, email to S. Seflin re payments made after bankruptcy filing	0.2	\$270.00	\$54.00
8/26/2022	JSW	Analysis of reply to motion to quash filed by LVDF	0.6	\$0.00	No Charge
8/29/2022	JBK	Analyze reply brief in further support of protective order.	1.0	\$675.00	\$675.00
8/30/2022	JT	Call with J. Shea re case status	0.1	\$270.00	\$27.00
8/31/2022	STG	Prepare for hearing on Discovery disputes regarding 2004 motion for claims adjudication.	4.9	\$895.00	\$4,385.50
8/31/2022	SKS	Review State of Nevada tax claim and prepare correspondence to claimant regarding same [.4]	0.4	\$675.00	\$270.00
8/31/2022	SKS	Review Meacher claim [.2]	0.2	\$675.00	\$135.00



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8/31/2022	JSW	Email to David Grey re 2004 examination of Dianne Meacher	0.1	\$395.00	\$39.50
Subtotal [120] Claims Admin			140.9		\$85,354.00
<u>[130] Fee/Employment Applications</u>					
5/25/2022	JSW	Edit Province Employment application	0.3	\$395.00	\$118.50
5/26/2022	JSW	Draft BG Employment Application	1.5	\$395.00	\$592.50
5/26/2022	JSW	Revise Province employment application [.2]; research standard under § 363(b) for employment of a professional [.2]; email to Province re declaration in support of the employment application [.1]	0.5	\$395.00	\$197.50
5/26/2022	JSW	Draft notice of hearing on BG employment application	0.4	\$395.00	\$158.00
5/26/2022	JSW	Draft BG employment application	0.4	\$395.00	\$158.00
5/26/2022	JSW	Draft declaration of S. Gubner in support of BG employment application	0.4	\$395.00	\$158.00
5/27/2022	JLB	Revise employment application and supporting Gubner declaration	0.5	\$575.00	\$287.50
5/27/2022	JLB	Correspondence with Stretto re finalizing BG employment application [.2]; confirm proper service of same with Stretto [.1]	0.3	\$575.00	\$172.50
5/27/2022	JLB	Prepare notice of hearing re employment application and correspondence with court re hearing date	0.3	\$575.00	\$172.50
5/27/2022	JLB	Multiple correspondence with Province re employment application, related to finalizing same and obtaining hearing date	0.2	\$575.00	\$115.00
5/27/2022	JLB	Strategize re finalizing BG employment application	0.1	\$575.00	\$57.50
5/27/2022	JLB	Correspondence with calendar clerk re hearing date on Province employment application	0.1	\$575.00	\$57.50
5/31/2022	JSW	Draft motion establishing procedures for interim compensation	1.5	\$395.00	\$592.50
5/31/2022	JSW	Draft application for OST re Province employment app [1.1]; draft proposed order regarding the same [.2]	1.3	\$395.00	\$513.50
5/31/2022	SKS	Draft order approving Stretto's retention [.7]	0.7	\$675.00	\$472.50
5/31/2022	SKS	Draft application to employ Province as financial advisor [.7]	0.7	\$675.00	\$472.50
5/31/2022	SKS	Conversation with Sean McGuire regarding Stretto employment order [.6]	0.6	\$675.00	\$405.00
5/31/2022	SKS	Conversations (multiple) with David Dachelet regarding terms of Province employment application [.3]	0.3	\$675.00	\$202.50



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5/31/2022	SKS	Revise application for order shortening time on Province employment application [.3]	0.3	\$675.00	\$202.50
5/31/2022	SKS	Revise Huygens declaration in support of Province employment application [.2]	0.2	\$675.00	\$135.00
5/31/2022	JSW	Strategize re preparing application for OST re hearings on BG employment application and Province employment application	0.1	\$395.00	\$39.50
6/6/2022	JLB	Analysis of issues re need for supplement to BG employment application	0.2	\$575.00	\$115.00
6/8/2022	JSW	Draft supplemental declaration in support of BG employment application	0.7	\$395.00	\$276.50
6/9/2022	JSW	Review correspondence regarding need to prepare employment application for Debtor's accountant	0.1	\$395.00	\$39.50
6/12/2022	SKS	Review correspondence from Leslie Sobol regarding employing her and her firm as accountant [.1]	0.1	\$675.00	\$67.50
6/14/2022	SKS	Draft Supplemental Huygens declaration regarding additional 2014 disclosure [.6]	0.6	\$675.00	\$405.00
6/14/2022	SKS	Conversation with Ed McDonald regarding supplemental Huygens declaration in support of Province employment application [.2]	0.2	\$675.00	\$135.00
6/16/2022	JSW	Draft accountant employment application [3] strategize re preparing employment application [.4]; research employment of professional holding prepetition claim [.6]; draft declaration of Leslie Sobol in support of employment application [.7]; draft notice of hearing [.2]	4.9	\$395.00	\$1,935.50
6/16/2022	JLB	Research related to accountant employment application	0.4	\$575.00	\$230.00
6/24/2022	JSW	Draft motion for interim compensation [2.4]; strategize re the same [.1]	2.5	\$395.00	\$987.50
6/24/2022	JLB	Strategy re Knudsen motion	0.3	\$575.00	\$172.50
6/24/2022	JSW	Draft declaration in support of Knudsen motion	0.3	\$395.00	\$118.50
6/24/2022	JSW	Draft proposed order re Knudsen motion	0.3	\$395.00	\$118.50
6/24/2022	JSW	Strategy re Knudsen motion	0.3	\$0.00	No Charge
6/27/2022	SKS	Prepare for hearing on applications to employ BG law and Province [.6]	0.6	\$675.00	\$405.00
6/27/2022	SKS	Conversation with Ignatius Piazza regarding information needed for application to employ accountant [.5]	0.5	\$675.00	\$337.50



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6/27/2022	JSW	Draft order granting Debtor's application to employ BG Law [.5]; draft order granting Debtor's application to employ Province [.3]	0.8	\$395.00	\$316.00
6/27/2022	SKS	Revise motion for procedures regarding interim compensation to professionals [.4]	0.4	\$675.00	\$270.00
6/27/2022	SKS	Conversations (multiple) with Leslie Sobol regarding information needed for employment application [.4]	0.4	\$675.00	\$270.00
6/27/2022	SKS	Revise application to employ Lucas Horsfall as accountant [.4]	0.4	\$675.00	\$270.00
6/27/2022	SKS	Revise order approving Province employment application [.3]	0.3	\$675.00	\$202.50
6/27/2022	JLB	Revise Knudsen motion	0.3	\$575.00	\$172.50
6/27/2022	SKS	Revise Sobol declaration in support of accountant employment application [.2]	0.2	\$675.00	\$135.00
6/27/2022	SKS	Revise order approving BG employment application [.1]; draft correspondence to Jared Day and Sam Schwartz regarding same [.1]	0.2	\$675.00	\$135.00
6/27/2022	JSW	Edit Knudsen motion	0.3	\$395.00	\$118.50
6/27/2022	JSW	Analysis of issues re motion establishing procedures for interim compensation	0.3	\$395.00	\$118.50
6/27/2022	JLB	Analysis of Knudsen issues on terms of proposed payments	0.2	\$575.00	\$115.00
6/27/2022	JLB	Revise Piazza declaration re Knudsen motion	0.2	\$575.00	\$115.00
6/27/2022	JSW	Analysis of issues re Lucas Horsfall employment application	0.2	\$395.00	\$79.00
6/27/2022	JSW	Strategize re Knudsen motion [.1]; edit motion re the same [.1]	0.2	\$395.00	\$79.00
6/27/2022	SKS	Draft correspondence to opposing counsel regarding draft of order approving Province employment [.1]	0.1	\$675.00	\$67.50
6/27/2022	JLB	Revise proposed order on Knudsen motion	0.1	\$575.00	\$57.50
6/27/2022	JSW	Analysis of issues re accountant employment application	0.1	\$395.00	\$39.50
6/27/2022	JSW	Edit accountant employment application	0.1	\$395.00	\$39.50
6/27/2022	JSW	Edit Knudsen motion	0.1	\$395.00	\$39.50
6/27/2022	JSW	Draft notice of hearing on motion to establish procedures for interim compensation of estate professionals	0.1	\$395.00	\$39.50
7/8/2022	SKS	Conversation with Terri Didion regarding UST comments to interim compensation motion and application to employ accountant [.5]	0.5	\$675.00	\$337.50



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7/8/2022	JSW	Analysis of issues re need to prepare supplemental declaration in support of accountant application [.1]; email to Lucas Horsfall re the same [.1]	0.2	\$395.00	\$79.00
7/11/2022	JSW	Draft supplemental declaration of Mr. Attia in support of Debtor's application to employ Lucas Horsfall	0.5	\$395.00	\$197.50
7/11/2022	SKS	Review LVDF qualified objection to compensation procedures motion [.1]	0.1	\$675.00	\$67.50
7/12/2022	JSW	Draft supplemental declaration of Mr. Attia in support of Lucas Horsfall application	0.6	\$395.00	\$237.00
7/12/2022	JSW	Email to Leslie Sobol re information needed for supplemental declaration of Mr. Attia in support of Debtor's application to employ Lucas Horsfall	0.1	\$395.00	\$39.50
7/13/2022	SKS	Revise Sameh Attia declaration in response to additional information requested by UST [.3]	0.3	\$675.00	\$202.50
7/13/2022	SKS	Conversations (multiple) with Leslie Sobol regarding additional information requested by UST in connection with Lucas Horsfall employment application [.3]	0.3	\$675.00	\$202.50
7/13/2022	JSW	Review finalized supplemental declaration of Mr. Attia in support of Debtor's application to employ Lucas Horsfall	0.1	\$395.00	\$39.50
7/25/2022	SKS	Prepare for hearing on Lucas Horsfall employment application [.3]	0.3	\$675.00	\$202.50
7/27/2022	JSW	Review entered order approving employment of counsel for Committee	0.1	\$395.00	\$39.50
7/29/2022	SKS	Revise proposed order on interim compensation motion [.3]	0.3	\$675.00	\$202.50
7/29/2022	JSW	Strategize re declaration by Leslie Sobol re waiver of prepetition claim [.2]; revise declaration re the same [.1]; email to Leslie Sobol re the same [.1]	0.4	\$395.00	\$158.00
7/29/2022	SKS	Draft Seflin declaration regarding interim comp order [.2]	0.2	\$675.00	\$135.00
7/29/2022	JSW	Draft supplemental declaration of Leslie Sobol re waiver of Lucas Horsfall's prepetition claim	0.2	\$395.00	\$79.00
7/29/2022	JSW	Finalize declaration re Lucas Horsfall waiver of prepetition claim	0.1	\$395.00	\$39.50
8/3/2022	STG	Review results from hearing on compensation and analyse and review order.	0.5	\$895.00	\$447.50
8/3/2022	SKS	Revise interim compensation order [.2]	0.2	\$675.00	\$135.00
8/4/2022	SKS	Revise order on interim comp motion [.2]	0.2	\$675.00	\$135.00



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8/5/2022	SKS	Draft order approving Lucas Horsfall employment application [.6]; prepare correspondence to Ed McDonald, Sam Schwartz, re same [.1]	0.7	\$675.00	\$472.50
8/5/2022	JSW	Email to Greg Garmin re employment of GT	0.1	\$395.00	\$39.50
8/5/2022	JSW	Analysis of issues re preparing monthly fee statement	0.1	\$395.00	\$39.50
8/9/2022	JSW	Draft application to employ GT as special counsel	2.0	\$395.00	\$790.00
8/9/2022	JSW	Further draft GT employment application	1.2	\$395.00	\$474.00
8/9/2022	JSW	Draft declaration of Jim Mace in support of the GT Employment Application	0.7	\$395.00	\$276.50
8/9/2022	JLB	Revise application to employ GT	0.4	\$575.00	\$230.00
8/9/2022	JSW	Edit application GT employment application	0.5	\$395.00	\$197.50
8/9/2022	JSW	Analysis of issues re preparing monthly fee statement	0.5	\$395.00	\$197.50
8/9/2022	JLB	Revise declaration of Jim Mace in support of GT employment application	0.3	\$575.00	\$172.50
8/9/2022	JSW	Draft proposed order re Application to Employ GT	0.3	\$395.00	\$118.50
8/9/2022	YD	Analysis of email from J. Wellington re Monthly Fee Statement in case and review of attachments and Order on same; and review documents and respond to J. Wellington and J. Treshinsky email on same; and prep document.	0.4	\$280.00	\$112.00
8/9/2022	JSW	Draft notice of hearing on GT employment application	0.2	\$395.00	\$79.00
8/9/2022	JLB	Revise proposed order approving GT Employment	0.1	\$575.00	\$57.50
8/10/2022	JSW	Further analysis of monthly fee statement	2.0	\$395.00	\$790.00
8/10/2022	JSW	Review monthly fee statement [1.4]; edit the same [.2]	1.6	\$395.00	\$632.00
8/10/2022	YD	Analysis of documents and preparation of BG 1st Monthly Fee Statement.	2.2	\$280.00	\$616.00
8/10/2022	YD	Analysis of documents and preparation of proforma of fees and costs for Fee Statement/BG 1st and revision to same and format documents as Exhibit to Fee Statement.	1.2	\$280.00	\$336.00
8/10/2022	YD	Analysis of email from J. Wellington re Fee Statement and modification to same and respond to email thereto and revision to Fee Statement and update backup documents and reformat exhibits for same.	0.6	\$280.00	\$168.00
8/10/2022	YD	Analysis and revision to BG Monthly Fee Statement and review of documents for same.	0.6	\$280.00	\$168.00



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8/10/2022	JSW	Revise declaration in support of GT's employment application [.1]; email to Jim Mace re the same [.1]	0.2	\$395.00	\$79.00
8/10/2022	YD	Finalize documents for Fee Statement and preparation of email and attachments to J. Wellington for review and approval thereto.	0.2	\$280.00	\$56.00
8/11/2022	YD	Revision to Proforma of Fees and Costs per S. Seflin comments and additional J. Wellington comments thereto.	2.0	\$280.00	\$560.00
8/11/2022	JSW	Further revise monthly fee statement	0.4	\$395.00	\$158.00
8/11/2022	YD	Finalize format of Fee Statement Exhibits and email to S. Seflin and J. Wellington.	0.4	\$280.00	\$112.00
8/11/2022	YD	Analysis of email from J. Wellington re Fee Statement and S. Seflin changes on same and request for update and respond to same and review of replies and respond thereto re finalize documents.	0.2	\$280.00	\$56.00
8/11/2022	JSW	Email to Tanner at Province re monthly fee statement	0.1	\$395.00	\$39.50
8/12/2022	JSW	Review Province monthly fee statement [.5]; revise the same [.2]; email to Province re the same [.1]	0.8	\$395.00	\$316.00
8/12/2022	SKS	Review and revise BG interim fee statement [.3]	0.3	\$675.00	\$202.50
8/12/2022	SKS	Conversation with Tanner James regarding interim compensation statement [.2]	0.2	\$675.00	\$135.00
8/12/2022	JSW	Analysis of issues re preparing BG monthly fee statement	0.3	\$395.00	\$118.50
8/12/2022	YD	Analysis of email from S. Gubner and Accounting re Soft Costs not captured for fee statement #1 and review of attachments and compare with Fee Statement backup documents and email responses on same; and prep of email to J. Wellington and S. Seflin on same and filing of BG 1st Fee Statement and review of J. Wellington response and reply thereto.	0.4	\$280.00	\$112.00
8/12/2022	JSW	Call with Paul Huygens re monthly fee statement	0.2	\$395.00	\$79.00
8/12/2022	JSW	Revise monthly fee statement	0.2	\$395.00	\$79.00
8/12/2022	YD	Analysis of email and attachment from S. Dressler re updated query results on Fees/Costs for Fee Statement and compare with Fee Statement supporting documents and email to S. Dressler and J. Wellington on same.	0.2	\$280.00	\$56.00
8/12/2022	JSW	Respond to email from Tanner James re monthly fee statement	0.1	\$395.00	\$39.50
8/15/2022	STG	Review and approve BG fee statement [1.6]; review fee statements from Committee counsel [1.1]; review statements from local counsel [.6]; review statements from FA [.8]	4.1	\$895.00	\$3,669.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
8/15/2022	JSW	Prepare BG's monthly fee statement	0.5	\$395.00	\$197.50
8/15/2022	YD	Analysis of email and attachment of BG Fee Statement and Exhibits thereof and Providence Fee Statement and backup documents; and email on filing of same.	0.2	\$280.00	\$56.00
8/15/2022	YD	Analysis of documents and review of finalized Fee Statement and Exhibits thereto.	0.2	\$280.00	\$56.00
8/16/2022	SKS	Review professional fee statements filed by all professionals [.7]; prepare chart regarding same for client [.1]	0.8	\$675.00	\$540.00
8/18/2022	JSW	Call to Jim Mace re GT employment application [.1]; email re the same [.1]	0.2	\$395.00	\$79.00
8/25/2022	JSW	Follow up email to Jim Mace re GT's employment application	0.1	\$395.00	\$39.50
8/25/2022	JSW	Respond to email from Jim Mace re GT employment application	0.1	\$395.00	\$39.50
8/26/2022	JSW	Edit GT employment application [.3]; edit notice of hearing re the same [.1]; edit declaration in support of the same [.1]; edit proposed order re the same [.1]	0.6	\$395.00	\$237.00
8/26/2022	JSW	Analysis of issues re finalizing GT employment application	0.3	\$395.00	\$118.50
8/26/2022	JSW	Email to Dr. Piazza re GT employment application	0.1	\$395.00	\$39.50
8/29/2022	JSW	Review finalized application to employ GT [.1]; review finalized notice of hearing re the same [.1]; review finalized declaration in support of the application [.1]	0.3	\$395.00	\$118.50
8/29/2022	JSW	Edit proposed order re GT employment application	0.1	\$395.00	\$39.50
Subtotal [130] Fee/Employment Applications			62.4		\$29,673.50
[135] Fee/Employment Objections					
6/13/2022	SKS	Draft correspondence to Ed McDonald regarding objection filed by UST to BG employment application [.4]	0.4	\$675.00	\$270.00
6/13/2022	SKS	Research regarding cases cited by UST in objection to BG employment application [.2]	0.2	\$675.00	\$135.00
6/13/2022	SKS	Review UST objection to BG employment application [.2]	0.2	\$675.00	\$135.00
6/13/2022	JLB	Analysis of issues re UST objection to employment application in light of Acevedo decision	0.2	\$575.00	\$115.00
6/17/2022	SKS	Conversation with Ed McDonald regarding objection to Province employment application [.4]	0.4	\$675.00	\$270.00
6/17/2022	SKS	Conversation with David Dachelet regarding UST objection to Province employment application [.3]	0.3	\$675.00	\$202.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/17/2022	SKS	Review UST objection to Province employment application [.2]	0.2	\$675.00	\$135.00
6/20/2022	JSW	Draft reply to UST objection to BG employment application	3.2	\$395.00	\$1,264.00
6/20/2022	SKS	Revise response to UST objection to BG employment application [.7]	0.7	\$675.00	\$472.50
6/23/2022	JSW	Draft reply to US Trustee's objection to Debtor's application to employ Province	1.1	\$395.00	\$434.50
6/23/2022	SKS	Revise reply to UST objection to Province employment application [.6]	0.6	\$675.00	\$405.00
6/23/2022	SKS	Conversations (multiple) with David Dachelet regarding response to UST objection to Province employment application [.3]	0.3	\$675.00	\$202.50
6/23/2022	SKS	Revise Dachelet declaration in response to UST objection to Province employment application [.2]	0.2	\$675.00	\$135.00
6/23/2022	JSW	Edit declaration of Province's principal in support of the Debtor's reply to the US Trustee's objection to Province's employment application [.1]; email to Mr. Dachelet regarding the same [.1]	0.2	\$395.00	\$79.00
6/23/2022	JSW	Strategize re preparing reply to US Trustee's objection to Province's employment application	0.1	\$395.00	\$39.50
7/18/2022	JSW	Further draft reply to US Trustee's objection to Lucas Horsfall application	1.3	\$395.00	\$513.50
7/18/2022	JSW	Draft reply to objection by UST to application to employ Lucas Horsfall	1.2	\$395.00	\$474.00
7/18/2022	SKS	Revise reply to UST objection to Lucas Horsfall employment application [.6]	0.6	\$675.00	\$405.00
Subtotal [135] Fee/Employment Objections			11.4		\$5,687.00

[140] Financing

5/24/2022	SKS	Further revise DIP motion per lender counsel's comments [.9]	0.9	\$675.00	\$607.50
5/25/2022	SKS	Further revise DIP loan documents and finalize [1.5]	1.5	\$675.00	\$1,012.50
5/25/2022	SKS	Conversation with Sam Schwartz regarding DIP financing and documenting loan [.3]	0.3	\$675.00	\$202.50
5/26/2022	SKS	Further revise loan documents [1.2]	1.2	\$675.00	\$810.00
5/26/2022	SKS	Conversations (multiple) with Paul Huygens regarding DIP financing issues [.7]	0.7	\$675.00	\$472.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
5/26/2022	SKS	Prepare emails (multiple) to Sam Schwartz and Bryan Lindsey regarding revisions to loan documents [.2] and review emails regarding same [.2]	0.4	\$675.00	\$270.00
5/27/2022	SKS	Draft interim cash collateral order [1.6]	1.6	\$675.00	\$1,080.00
5/28/2022	SKS	Further revise interim DIP order [.6]	0.6	\$675.00	\$405.00
5/28/2022	SKS	Conference call with Sam Schwartz and Paul Huygens regarding interim dip order [.5]	0.5	\$675.00	\$337.50
5/28/2022	SKS	Further revise DIP order [.1]; prepare correspondence to opposing counsel regarding same and review correspondence regarding same [.2]	0.3	\$675.00	\$202.50
5/28/2022	SKS	Draft correspondence to opposing counsel regarding DIP order [.1]	0.1	\$675.00	\$67.50
5/29/2022	STG	Telephone conference with P. Huygens re DIP financing [.8]; review objections file by LVDF to DIP financing motion [1.7]	2.5	\$895.00	\$2,237.50
5/29/2022	SKS	Conversations (multiple) with Ed McDonald regarding terms of DIP order [1.1]	1.1	\$675.00	\$742.50
5/29/2022	SKS	Prepare correspondence (multiple) to opposing counsel regarding terms of DIP order and review emails (multiple) regarding same [.7]	0.7	\$675.00	\$472.50
5/29/2022	SKS	Further revise DIP order based on UST comments [.4]	0.4	\$675.00	\$270.00
5/30/2022	SKS	Draft Seflin declaration in response to LVDF objection to DIP financing order [1.2]	1.2	\$675.00	\$810.00
5/30/2022	SKS	Further revise DIP order per UST comments [.3]	0.3	\$675.00	\$202.50
5/30/2022	SKS	Review objection filed by LVDF to form of DIP order [.2]	0.2	\$675.00	\$135.00
5/31/2022	SKS	Conversation with Paul Huygens regarding DIP financing [.3]	0.3	\$675.00	\$202.50
5/31/2022	SKS	Review entered DIP order [.2]; prepare correspondence to client regarding same [.1]	0.3	\$675.00	\$202.50
6/1/2022	SKS	Review correspondence from Brian Shapiro regarding deposition request regarding DIP financing and draft response [.9]	0.9	\$675.00	\$607.50
6/1/2022	SKS	Analysis of issues regarding LVDF request for discovery prior to DIP hearing [.6]	0.6	\$675.00	\$405.00
6/1/2022	SKS	Review correspondence from LVDF counsel regarding request for deposition and appraisal relating to DIP financing [.1] and begin drafting response [.5]	0.6	\$675.00	\$405.00
6/1/2022	SKS	Conversation with Sam Schwartz regarding DIP financing [.6]	0.6	\$675.00	\$405.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/1/2022	SKS	Conversations (multiple) with Paul Huygens regarding DIP financing [.5]	0.5	\$675.00	\$337.50
6/1/2022	JLB	Research authorities re contested matters in DIP financing, in preparation for responding to requests re same	0.4	\$575.00	\$230.00
6/1/2022	SKS	Conversation with Brian Shapiro regarding DIP financing and related issues [.3]	0.3	\$675.00	\$202.50
6/1/2022	SKS	Conversation with Westwind regarding confirmation of wire information for first DIP financing draw [.2]	0.2	\$675.00	\$135.00
6/2/2022	JLB	Draft letter to Brian Shapiro re appraisal	0.4	\$575.00	\$230.00
6/2/2022	JLB	Analysis of issues re supplemental declarations needed in support of DIP motion	0.4	\$575.00	\$230.00
6/2/2022	JSW	Draft supplemental declaration of Paul Huygens in support of the Debtor's DIP Financing Motion	0.2	\$395.00	\$79.00
6/2/2022	JLB	Analysis of issues re preparing letter to Brian Shapiro re DIP appraisal dispute	0.1	\$575.00	\$57.50
6/3/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding 2004 exams related to DIP financing [1.2]	1.2	\$675.00	\$810.00
6/3/2022	SKS	Draft response to Brian Shapiro email regarding scheduling deposition dates and producing documents relating to DIP financing [1.1]	1.1	\$675.00	\$742.50
6/3/2022	SKS	Review correspondence and documents from Brian Shapiro regarding discovery requests related to the DIP financing motion [.7]	0.7	\$675.00	\$472.50
6/3/2022	SKS	Conversation with Bryan Lindsey regarding filing UCC with respect to DIP financing [.3]	0.3	\$675.00	\$202.50
6/3/2022	JLB	Analysis of information from Province re appraisal, related to supplemental filing	0.2	\$575.00	\$115.00
6/4/2022	STG	Telephone conference with G. Garman re: back up financing term sheet and timing [.4]; Telephone conference with B. Sherre: confirmation Lender is prepared to proceed [.2]	0.6	\$895.00	\$537.00
6/6/2022	SKS	Conference call with Paul Huygens and Greg Garman regarding Piazza depositions regarding DIP motion [.3]	0.3	\$675.00	\$202.50
6/6/2022	SKS	Prepare correspondence (multiple) to Ignatius Piazza and Brad Ackman regarding scheduling of LVDF appraisal in connection with DIP motion and review correspondence regarding same [.3]	0.3	\$675.00	\$202.50
6/6/2022	SKS	Conversation with Brian Shapiro regarding depositions regarding DIP motion [.3]	0.3	\$675.00	\$202.50



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/6/2022	SKS	Review correspondence from Brian Shapiro and draft correspondence regarding deposition of Ignatius Piazza regarding DIP motion [.2]	0.2	\$675.00	\$135.00
6/8/2022	STG	Telephone conference with potential lender with exit financing and prepare for same.	0.7	\$895.00	\$626.50
6/10/2022	SKS	Review supplemental opposition to DIP financing filed by LVDF [.3]	0.3	\$675.00	\$202.50
6/11/2022	SKS	Review emails (multiple) from Sam Schwartz regarding DIP financing and supplemental evidence [.2] and prepare emails (multiple) regarding same [.2]	0.4	\$675.00	\$270.00
6/12/2022	SKS	Review member spending analysis with respect to financing [.2]	0.2	\$675.00	\$135.00
6/13/2022	SKS	Conference call with Greg Garman, Steve Gubner, Paul Huygens, Ignatius Piazza regarding discovery related to DIP financing [.7]	0.7	\$675.00	\$472.50
6/13/2022	SKS	Conversations (multiple) with Paul Huygens regarding DIP financing and related APA [.4]	0.4	\$675.00	\$270.00
6/14/2022	SKS	Conversations (multiple) with Paul Huygens regarding various financing issues [.9]	0.9	\$675.00	\$607.50
6/15/2022	SKS	Review correspondence (multiple) from committee counsel regarding requests for multiple documents relating to DIP financing and prepare correspondence regarding same [.7]	0.7	\$675.00	\$472.50
6/15/2022	JLB	Analysis of issues re correspondence on deposition in preparation for final DIP hearing	0.2	\$575.00	\$115.00
6/16/2022	SKS	Conversation with Jason Adams regarding DIP order and related issues [.3]	0.3	\$675.00	\$202.50
6/16/2022	SKS	Conversation with Sam Schwartz regarding DIP financing [.2]	0.2	\$675.00	\$135.00
6/17/2022	SKS	Review correspondence from committee counsel regarding DIP financing and prepare correspondence (multiple) regarding same [.4]	0.4	\$675.00	\$270.00
6/17/2022	SKS	Conversation with Greg Garman regarding terms of DIP financing and stalking horse [.3]	0.3	\$675.00	\$202.50
6/19/2022	SKS	Draft reply to objections to DIP financing motion [1.7]	1.7	\$675.00	\$1,147.50
6/20/2022	SKS	Further draft reply to objections to DIP financing motion [2.4]	2.4	\$675.00	\$1,620.00
6/20/2022	SKS	Draft Huygens declaration in support of DIP financing motion [1.1]	1.1	\$675.00	\$742.50
6/20/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding information needed for response to objections to DIP motion [.7]	0.7	\$675.00	\$472.50



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6/20/2022	JT	Review client's comments to declaration [.1], revise same [.6], email to S. Gubner re updates [.1]	0.8	\$270.00	\$216.00
6/21/2022	SKS	Conversation with committee counsel regarding DIP financing [.6]	0.6	\$675.00	\$405.00
6/21/2022	JLB	Strategy re final DIP hearing	0.5	\$575.00	\$287.50
6/21/2022	JLB	Analysis of final documents submitted for continued first day hearings	0.3	\$575.00	\$172.50
6/22/2022	JBK	Analyze evidentiary objections filed by the secured lender and draft response.	3.8	\$675.00	\$2,565.00
6/22/2022	SKS	Draft response to LVDF objection and motion to strike Debtor's reply declarations regarding DIP financing motions [2.1]	2.1	\$675.00	\$1,417.50
6/22/2022	SKS	Conference call with committee and lender's counsel regarding DIP financing and issues related thereto [.8]	0.8	\$675.00	\$540.00
6/22/2022	SKS	Conversation with Greg Garman regarding LVDF objections to dip financing [.5]	0.5	\$675.00	\$337.50
6/23/2022	SKS	Conversation with Tanner James regarding various financing issues [.5]	0.5	\$675.00	\$337.50
6/23/2022	JLB	Research applicable authorities re valuation, related to preparation for DIP hearing	0.3	\$575.00	\$172.50
6/23/2022	SKS	Draft declaration of appraiser regarding January 2022 appraisal [.2]	0.2	\$675.00	\$135.00
6/23/2022	JLB	Review final version of response re evidentiary objections	0.1	\$575.00	\$57.50
6/24/2022	JBK	Prepare for and participate in hearing on DIP financing.	2.5	\$675.00	\$1,687.50
6/24/2022	SKS	Prepare for hearing on DIP financing motion and review documents [1.3]	1.3	\$675.00	\$877.50
6/24/2022	SKS	Draft stipulation resolving Meacher objection to DIP motion [.5]; draft correspondence to opposing counsel regarding same [.2]	0.7	\$675.00	\$472.50
6/25/2022	STG	Multiple calls with Province, UCC counsel and Schwartz re: resolving disputes related to DIP financing.	1.1	\$895.00	\$984.50
6/25/2022	SKS	Review correspondence and changes to stipulation from Matt Stockl regarding Meacher stipulation to resolve objection to DIP motion [.3] and draft correspondence regarding same [.1]	0.4	\$675.00	\$270.00
6/25/2022	SKS	Revise stipulation resolving Meacher opposition to DIP financing based on comments from opposing counsel [.3]	0.3	\$675.00	\$202.50



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6/26/2022	SKS	Review further revised stipulation resolving objections to DIP financing from Matt Stockl and draft response [.3]	0.3	\$675.00	\$202.50
6/27/2022	STG	Assist in negotiations between DIP and UCC.	1.2	\$895.00	\$1,074.00
6/28/2022	STG	Prepare for and attend hearing on Oral ruling on DIP financing	2.2	\$895.00	\$1,969.00
6/28/2022	SKS	Appear at oral ruling on DIP financing motion [1.6]	1.6	\$675.00	\$1,080.00
6/28/2022	SKS	Conversation with Tanner James regarding DIP financing [.3]	0.3	\$675.00	\$202.50
6/28/2022	SKS	Conversation with Paul Huygens regarding approval of DIP financing [.2]	0.2	\$675.00	\$135.00
6/28/2022	JLB	Analysis of next steps in case in light of DIP approval	0.2	\$575.00	\$115.00
6/29/2022	SKS	Draft final DIP order [1.9]	1.9	\$675.00	\$1,282.50
6/29/2022	SKS	Conversation with Lauren Schlusel regarding DIP financing order [.5]	0.5	\$675.00	\$337.50
6/29/2022	JLB	Analysis of issues re finalizing final DIP order	0.1	\$575.00	\$57.50
6/30/2022	SKS	Further revise DIP order per committee comments [.6]	0.6	\$675.00	\$405.00
6/30/2022	SKS	Further revise DIP financing order multiple times per comments from opposing counsel [.5]	0.5	\$675.00	\$337.50
6/30/2022	SKS	Review proposed DIP budget and prepare comments regarding same [.5]	0.5	\$675.00	\$337.50
6/30/2022	SKS	Conversations (multiple) with committee counsel regarding DIP financing order [.4]	0.4	\$675.00	\$270.00
6/30/2022	SKS	Conversation with Paul Huygens regarding DIP financing budget [.4]	0.4	\$675.00	\$270.00
6/30/2022	SKS	Conversations (multiple) with Sam Schwartz regarding terms of DIP order [.3]	0.3	\$675.00	\$202.50
7/1/2022	SKS	Conversations (multiple) with Paul Huygens regarding DIP financing budget [.7]	0.7	\$675.00	\$472.50
7/1/2022	SKS	Review transcript from oral ruling on DIP motion [.2]	0.2	\$675.00	\$135.00
7/1/2022	SKS	Review emails (multiple) from opposing counsel regarding DIP budget approval and prepare emails regarding same [.2]	0.2	\$675.00	\$135.00
7/1/2022	SKS	Conversation with Ignatius Piazza regarding DIP order [.1]	0.1	\$675.00	\$67.50
7/1/2022	SKS	Conversation with Lauren Schlusel regarding DIP budget [.1]	0.1	\$675.00	\$67.50
7/18/2022	STG	Revise projections to actuals and analyse same.	1.2	\$895.00	\$1,074.00



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7/18/2022	STG	Front Sight Projections call with FA and principal.	1.0	\$895.00	\$895.00
7/25/2022	STG	Telephone conference with S.Schwartz, P. Huygens and B. Lehane re: DIP Lender refusing to extend deadlines.	0.7	\$895.00	\$626.50
7/25/2022	STG	Review Projections Current & Actual.	0.7	\$895.00	\$626.50
7/25/2022	STG	Telephone conference with possible replacement financing.	0.4	\$895.00	\$358.00
7/26/2022	SKS	Research regarding EB-5 financing and treatment in bankruptcy cases [1.3]	1.3	\$675.00	\$877.50
8/3/2022	STG	Analyse issues re: new and additional financing with FA and new terms for same.	1.4	\$895.00	\$1,253.00
8/3/2022	SKS	Review loan documents and DIP financing orders regarding access by Westwind surveyor to property [1.2]	1.2	\$675.00	\$810.00
8/3/2022	SKS	Conversations (multiple) with client regarding lender access to property under loan documents [.5]	0.5	\$675.00	\$337.50
8/8/2022	SKS	Review July fee statement from lender's counsel and identify inappropriate charges [.7]; prepare correspondence to client regarding same [.2]	0.9	\$675.00	\$607.50
8/11/2022	STG	Review email from DIP counsel and analysis of same re: inspection rights under DIP Agreement.	0.5	\$895.00	\$447.50
8/17/2022	SKS	Conversation with Ignatius Piazza regarding unauthorized access to property by DIP lender [.2]	0.2	\$675.00	\$135.00
8/18/2022	SKS	Review correspondence from Sam Schwartz about DIP draw and visit to property and prepare correspondence regarding same [.3]	0.3	\$675.00	\$202.50
8/26/2022	SKS	Draft correspondence (multiple) to Sam Schwartz regarding inappropriate July 2022 DIP fees and review emails regarding same [1.3]	1.3	\$675.00	\$877.50
Subtotal [140] Financing			78.0		\$55,074.00
[160] Meeting of Creditors					
6/2/2022	SKS	Follow up with courtroom deputy regarding entry of limit notice order so 341a notice can get timely served [.1]	0.1	\$675.00	\$67.50
6/21/2022	STG	Telephone conference with OCC counsel re: upcoming 341a [.4]; 2 calls from creditors re: upcoming 341a [.2]; Telephone conference with Ed McDonald at Office of the U.S. Trustee [.3]	0.9	\$895.00	\$805.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/22/2022	STG	Prepare for 341(a) with Dr. Piazza [.5]; review pleadings and schedules in preparation of 34a(a)[1.9]; draft opening statement and confirm same including multiple edits [2.6]; Telephone conference with e. McDonald re: upcoming 341 [.3]; Telephone conference with G. Garmin [.4]	5.7	\$895.00	\$5,101.50
6/23/2022	STG	Prepared for Meeting of creditors [1.2]; Meeting of creditors [5.0]; review emails and respond to creditors wanting to remain anonymous [.4] (4 creditors); review issues regarding TRO discussions from 341a and emails from LVDF [.5]	7.1	\$895.00	\$6,354.50
Subtotal [160] Meeting of Creditors			13.8		\$12,329.00
<u>[170] Plan & Disclosure Statement</u>					
5/28/2022	SKS	Conversation with Ignatius Piazza regarding terms of plan of reorganization [1.2]	1.2	\$675.00	\$810.00
5/28/2022	SKS	Conversation with Paul Huygens regarding terms of plan [.6]	0.6	\$675.00	\$405.00
5/29/2022	SKS	Conversation with Ignatius regarding options for restructuring plan [.9]	0.9	\$675.00	\$607.50
6/7/2022	SKS	Begin drafting chapter 11 plan [.8]	0.8	\$675.00	\$540.00
6/13/2022	JSW	Strategize re preparing disclosure statement [.1]; conference call with Province regarding the same [.9]	1.0	\$395.00	\$395.00
6/27/2022	JSW	Draft disclosure statement	1.2	\$395.00	\$474.00
6/27/2022	SKS	Prepare correspondence (multiple) to Sam Schwartz regarding request for additional time to file plan and review correspondence regarding same [.2]	0.2	\$675.00	\$135.00
6/27/2022	JSW	Strategize re status of case and preparing disclosure statement	0.3	\$395.00	\$118.50
6/27/2022	JSW	Analysis of issues re preparing disclosure statement	0.3	\$395.00	\$118.50
6/29/2022	STG	Analyse issues and planning for Plan Confirmation [2.9]; Telephone conference with client [1.4]	4.3	\$895.00	\$3,848.50
6/29/2022	SKS	Analysis of issues regarding plan deadlines [.6] and draft correspondence to client regarding same [.2]	0.8	\$675.00	\$540.00
6/30/2022	SKS	Conference call with Ignatius Piazza, Greg Garman and Steve Gubner regarding terms of plan of reorganization [1.1]	1.1	\$675.00	\$742.50
7/5/2022	SKS	Analysis of issues regarding terms of plan [.8]	0.8	\$675.00	\$540.00
7/7/2022	STG	Call w Ignatius, Greg Garman re: plan terms and need for speed [1.0]; analyse issues re: plan terms and disclosure statement [1.2];	2.2	\$895.00	\$1,969.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/7/2022	JSW	Draft disclosure statement	2.4	\$395.00	\$948.00
7/7/2022	SKS	Conversation with Paul Huygens regarding terms of plan [1.4]	1.4	\$675.00	\$945.00
7/7/2022	JSW	Draft disclosure statement	2.0	\$395.00	\$790.00
7/7/2022	SKS	Conference call with Ignatius Piazza, Greg Garman and Steve Gubner regarding terms of plan and related issues [1.0]	1.0	\$675.00	\$675.00
7/7/2022	SKS	Conference call with financial advisor regarding plan projections and liquidation analysis [1.0]	1.0	\$675.00	\$675.00
7/7/2022	JSW	Analysis of financials re preparing disclosure statement	1.6	\$395.00	\$632.00
7/7/2022	JSW	Further draft disclosure statement	1.5	\$395.00	\$592.50
7/7/2022	JSW	Draft disclosure statement	1.4	\$395.00	\$553.00
7/7/2022	JLB	Strategize re terms of plan relating to membership class	0.8	\$575.00	\$460.00
7/7/2022	JSW	Research rejection damages re lifetime memberships re preparing disclosure statement	0.8	\$395.00	\$316.00
7/7/2022	JSW	Further analysis of issues re plan and disclosure statement	0.6	\$395.00	\$237.00
7/7/2022	JLB	Further strategize re plan provisions related to unsecured classes	0.3	\$575.00	\$172.50
7/7/2022	JLB	Analysis of issues re preparation of disclosure statement	0.3	\$575.00	\$172.50
7/7/2022	JSW	Further strategize re disclosure statement	0.4	\$395.00	\$158.00
7/7/2022	JSW	Plan analysis and review	0.4	\$395.00	\$158.00
7/8/2022	JSW	Further draft disclosure statement	1.7	\$395.00	\$671.50
7/8/2022	JSW	Further draft disclosure statement	1.1	\$395.00	\$434.50
7/8/2022	JSW	Draft disclosure statement	0.9	\$395.00	\$355.50
7/10/2022	STG	Telephone conference with P. Huygens.	1.5	\$895.00	\$1,342.50
7/10/2022	SKS	Research regarding various ways to allocate profits in plan [1.1]	1.1	\$675.00	\$742.50
7/10/2022	STG	Telephone conference with P. Huygens re: Plan terms.	0.8	\$895.00	\$716.00
7/10/2022	SKS	Conversation with Paul Huygens regarding plan terms [.7]	0.7	\$675.00	\$472.50
7/11/2022	SKS	Conversation with Dr. Piazza regarding plan terms [1.2]	1.2	\$675.00	\$810.00
7/11/2022	SKS	Conversation with Paul Huygens regarding plan terms [1.1]	1.1	\$675.00	\$742.50
7/11/2022	JSW	Analysis of issues re preparing disclosure statement	0.3	\$395.00	\$118.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/12/2022	SKS	Draft chapter 11 disclosure statement [2.4]	2.4	\$675.00	\$1,620.00
7/12/2022	SKS	Conference call with Ignatius Piazza and Greg Garman regarding plan terms [1.6]	1.6	\$675.00	\$1,080.00
7/12/2022	SKS	Video conference with Paul Huygens, Ignatius Piazza and Greg Garman regarding plan terms [1.0]	1.0	\$675.00	\$675.00
7/13/2022	SKS	Draft chapter 11 disclosure statement [5.7]	5.7	\$675.00	\$3,847.50
7/13/2022	STG	Further review of plan terms and analyse same.	2.8	\$895.00	\$2,506.00
7/14/2022	STG	Telephone conference with counsel for Piazza, Phuygens re: Plan terms and structure [1.1]; further review of disclosure statementand plan as drafted re: profit participation and claims cut-off [2.2]	3.3	\$895.00	\$2,953.50
7/14/2022	SKS	Draft chapter 11 plan [2.3]	2.3	\$675.00	\$1,552.50
7/14/2022	SKS	Draft disclosure statement [2.0]	2.0	\$675.00	\$1,350.00
7/14/2022	SKS	Revise disclosure statement per comments from client and financial advisor [1.7]	1.7	\$675.00	\$1,147.50
7/14/2022	SKS	Conversation with committee counsel regarding terms of plan [1.0]	1.0	\$675.00	\$675.00
7/14/2022	SKS	Conference call with Paul Huygens, Greg Garman and Steve Gubner regarding plan treatment of claims [1.0]	1.0	\$675.00	\$675.00
7/14/2022	SKS	Review documents regarding Meacher agreements with respect to plan treatment [.7]	0.7	\$675.00	\$472.50
7/14/2022	SKS	Conversations (multiple) with Paul Huygens regarding information needed for plan [.6]	0.6	\$675.00	\$405.00
7/14/2022	JSW	Analysis of issues re preparing disclosure statement	0.3	\$395.00	\$118.50
7/15/2022	STG	Conference Call with all hands to finalize plan terms and disclosure statement to file today [1.1]; review emails from client on ammendments [.8]; review final documents to be filed today [.6]	2.5	\$895.00	\$2,237.50
7/15/2022	SKS	Further revise disclosure statement per client comments and finalize for filing [1.5]	1.5	\$675.00	\$1,012.50
7/15/2022	SKS	Conference call with client and Paul Huygens regarding plan terms [1.3]	1.3	\$675.00	\$877.50
7/15/2022	SKS	Further revise plan per client comments [1.2]	1.2	\$675.00	\$810.00
7/15/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding information needed for plan and disclosure statement [.6]	0.6	\$675.00	\$405.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/15/2022	SKS	Conversation with Paul Huygens regarding plan terms [.5]	0.5	\$675.00	\$337.50
7/15/2022	SKS	Draft notice of hearing on disclosure statement [.2]	0.2	\$675.00	\$135.00
7/19/2022	SKS	Research regarding discovery related to claim estimation motions [1.3]	1.3	\$675.00	\$877.50
7/25/2022	STG	Discuss modified terms of the Plan.	1.8	\$895.00	\$1,611.00
7/25/2022	SKS	Conference call with Ignatius Piazza, Paul Huygens, Steve Gubner, Tanner James and Greg Garman regarding various plan terms [1.0]	1.0	\$675.00	\$675.00
7/25/2022	SKS	Conversation with Tanner James regarding customer program under plan [.5]	0.5	\$675.00	\$337.50
7/26/2022	SKS	Conversation with Teresa Pilatowicz regarding various issues regarding plan [.3]	0.3	\$675.00	\$202.50
7/27/2022	SKS	Conversations (multiple) with Paul Huygens regarding plan terms [1.1]	1.1	\$675.00	\$742.50
7/27/2022	SKS	Draft term sheet for proposed equity investor under plan [.7]	0.7	\$675.00	\$472.50
7/27/2022	SKS	Review correspondence from committee counsel regarding plan discussion and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
7/28/2022	SKS	Analysis of issues regarding dealing with LVDF claim under plan [.8]	0.8	\$675.00	\$540.00
7/28/2022	SKS	Draft first amended disclosure statement [.7]	0.7	\$675.00	\$472.50
7/28/2022	SKS	Analysis of issues regarding terms of equity investment in plan [.6]	0.6	\$675.00	\$405.00
7/28/2022	JLB	Strategy re disposition of affirmative claims against LVDF in plan	0.4	\$575.00	\$230.00
7/28/2022	JLB	Research authorities re claim estimation procedures re LVDF claim	0.2	\$575.00	\$115.00
7/29/2022	STG	Telephone conference with client re: modifying terms.	2.0	\$895.00	\$1,790.00
7/29/2022	SKS	Conference call with Ignatius Piazza, Greg Garman, Steve Gubner etc regarding plan terms and related issues [2.1]	2.1	\$675.00	\$1,417.50
7/29/2022	JSW	Analysis of issues re treatment of claims in amended plan	1.4	\$395.00	\$553.00
7/29/2022	SKS	Conversations (multiple) with Tanner James regarding plan terms [.7]	0.7	\$675.00	\$472.50



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/29/2022	SKS	Draft correspondence regarding potential equity investor to financial advisor and review correspondence regarding same [.5]	0.5	\$675.00	\$337.50
7/29/2022	JLB	Meeting with client and FA re plan structure	0.5	\$575.00	\$287.50
7/31/2022	SKS	Conversation with Paul Huygens regarding potential equity investor [.7]	0.7	\$675.00	\$472.50
7/31/2022	SKS	Review correspondence (multiple) from Paul Huygens regarding potential equity investor through plan [.3] and prepare correspondence (multiple) regarding same [.3]	0.6	\$675.00	\$405.00
8/1/2022	JLB	Strategy re potential equity investment re: plan	0.8	\$575.00	\$460.00
8/2/2022	SKS	Conversation with committee counsel Lauren Schlusell regarding plan [.3]	0.3	\$675.00	\$202.50
8/3/2022	SKS	Draft memo regarding feasibility [.9]	0.9	\$675.00	\$607.50
8/3/2022	SKS	Conversations (multiple) with Tanner James regarding plan feasibility [.5]	0.5	\$675.00	\$337.50
8/4/2022	SKS	Draft amended disclosure statement [.7]	0.7	\$675.00	\$472.50
8/4/2022	SKS	Conversation with Paul Huygens regarding plan terms [.6]	0.6	\$675.00	\$405.00
8/5/2022	SKS	Draft notice of continued hearing on disclosure statement [.2]	0.2	\$675.00	\$135.00
8/5/2022	JSW	Strategize re continuance of hearing on Debtor's disclosure statement	0.1	\$395.00	\$39.50
8/7/2022	STG	Review terms and provisions of plan [1.1]; discuss same with counsel for Piazza [.5];	1.6	\$895.00	\$1,432.00
8/8/2022	SKS	Conference call with Ignatius Piazza, Greg Garman, Steve Gubner, Paul Huygens etc regarding plan confirmation issues and funding [1.4]	1.4	\$675.00	\$945.00
8/8/2022	JSW	Analysis of plan terms and strategy	1.3	\$395.00	\$513.50
8/8/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding various plan issues [.5]	0.5	\$675.00	\$337.50
8/8/2022	SKS	Conversation with Paul Huygens regarding various plan issues [.4]	0.4	\$675.00	\$270.00
8/9/2022	STG	Prepare for and conduct Conference Call call with all hands [2.4]; prepare internal memo on results and path forward on DS and Plan [.7]	3.1	\$895.00	\$2,774.50



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8/10/2022	SKS	Review correspondence from Rick Mantin regarding plan treatment and related issues and prepare correspondence regarding same [.3]	0.3	\$675.00	\$202.50
8/18/2022	SKS	Review and revise plan term sheet with Westwind [1.5]	1.5	\$675.00	\$1,012.50
8/18/2022	SKS	Conversation with Paul Huygens regarding plan terms [1.0]	1.0	\$675.00	\$675.00
8/18/2022	SKS	Conversations (multiple) with Greg Garman regarding plan terms [.5]	0.5	\$675.00	\$337.50
8/19/2022	STG	Prepared for and attend Telephone conference with all hands on Plan [1.1]; review ammendments on possible sale terms to WW [1.2]	2.3	\$895.00	\$2,058.50
8/19/2022	SKS	Conference call with Greg Garman, Ignatius Piazza, Steve Gubner, Tanner James, etc re plan confirmation terms [1.5]	1.5	\$675.00	\$1,012.50
8/19/2022	JSW	Conference call with Greg, Tanner, Dr. Piazza, S. Gubner and S. Seflin to discuss potential plan	1.2	\$395.00	\$474.00
8/19/2022	SKS	Conversation with Greg Garman regarding plan issues [.2]	0.2	\$675.00	\$135.00
8/20/2022	STG	Review proposal from counsel on change in plan terms [.5]; analyse issues re: effect on terms of plan and creditors [1.1]; review correspondence to OCUC re: potential change in terms [.5]	2.1	\$895.00	\$1,879.50
8/20/2022	SKS	Review and revise letter to committee regarding email to members to ascertain their willingness to pay new fees [.6]	0.6	\$675.00	\$405.00
8/20/2022	SKS	Conversation with Sam Schwartz regarding potential deal with FS DIP re plan [.3]	0.3	\$675.00	\$202.50
8/20/2022	SKS	Conversations (multiple) with Tanner regarding plan terms [.3]	0.3	\$675.00	\$202.50
8/21/2022	SKS	Conversation with Paul Huygens regarding plan terms [.7]	0.7	\$675.00	\$472.50
8/21/2022	SKS	Prepare correspondence to committee counsel regarding various plan issues [.6]	0.6	\$675.00	\$405.00
8/21/2022	SKS	Conversation with Bob LeHane regarding email to members for plan purposes [.3]	0.3	\$675.00	\$202.50
8/22/2022	SKS	Conversations (multiple) with client regarding various plan issues [1.0]	1.0	\$675.00	\$675.00
8/22/2022	SKS	Draft amended disclosure statement [.7]	0.7	\$675.00	\$472.50
8/22/2022	SKS	Conversation with Greg Garman regarding various plan issues [.4]	0.4	\$675.00	\$270.00
8/23/2022	SKS	Conference call with committee counsel, committee financial advisor, debtor financial advisor regarding plan terms [1.5]	1.5	\$675.00	\$1,012.50



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8/24/2022	SKS	Analysis of issues regarding plan terms [1.4]	1.4	\$675.00	\$945.00
8/24/2022	SKS	Review redlines to proposed term sheet and other documents regarding equity investment through plan [.9]	0.9	\$675.00	\$607.50
8/24/2022	SKS	Conversation with Paul Huygens regarding plan terms [.8]	0.8	\$675.00	\$540.00
8/24/2022	SKS	Conversation with Ignatius Piazza regarding various plan issues [.3]	0.3	\$675.00	\$202.50
8/25/2022	STG	Review multiple emails on topics to Plan and disclosure statement modifications [.3]; Telephone conference with all hands re: ammendments to Plan to be filed [.8]	1.1	\$895.00	\$984.50
8/25/2022	SKS	Conversations (multiple) with Paul Huygens regarding plan terms [1.4]	1.4	\$675.00	\$945.00
8/25/2022	JSW	Research treatment of secured claims under the plan	2.0	\$395.00	\$790.00
8/25/2022	SKS	Conference call with Ignatius Piazza, Paul Huygens et al re plan terms [.9]	0.9	\$675.00	\$607.50
8/25/2022	SKS	Draft memorandum regarding plan terms [.8]	0.8	\$675.00	\$540.00
8/25/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding plan timing [.4]	0.4	\$675.00	\$270.00
8/29/2022	SKS	Draft first amended plan [1.9]	1.9	\$675.00	\$1,282.50
8/30/2022	SKS	Further draft amended disclosure statement [1.7]	1.7	\$675.00	\$1,147.50
8/30/2022	SKS	Conversation with Jim Shea regarding treatment of unsecured claims under plan [.5]	0.5	\$675.00	\$337.50
8/31/2022	SKS	Draft first amended disclosure statement [3.3]	3.3	\$675.00	\$2,227.50
8/31/2022	SKS	Conference call with Greg Garman and Paul Huygens regarding deal with FS DIP regarding plan terms [1.4]	1.4	\$675.00	\$945.00
8/31/2022	SKS	Prepare correspondence to financial advisor regarding plan projections and review emails regarding same [.7]	0.7	\$675.00	\$472.50
8/31/2022	SKS	Conference call with Paul Huygens and Tanner James re plan projections [.4]	0.4	\$675.00	\$270.00
8/31/2022	SKS	Conversation with Greg Garman regarding various issues related to plan [.3]	0.3	\$675.00	\$202.50
8/31/2022	SKS	Draft correspondence regarding preparing motion to extend exclusivity and review correspondence regarding same [.3]	0.3	\$675.00	\$202.50
8/31/2022	SKS	Conversation with Tanner James regarding information needed for amended disclosure statement [.2]	0.2	\$675.00	\$135.00



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8/31/2022	SKS	Conversation with committee counsel Lauren Schlusell regarding plan terms [.2]	0.2	\$675.00	\$135.00
8/31/2022	JLB	Review and analysis of voting options for members, related to potential structuring of plan	0.2	\$575.00	\$115.00
Subtotal [170] Plan & Disclosure Statement			144.8		\$97,522.00
<u>[180] Relief from Stay Proceedings</u>					
6/28/2022	STG	Review LVDF motion for relief from automatic stay.	1.9	\$895.00	\$1,700.50
6/28/2022	JBK	Research regarding LVDF's motion for relief from stay.	1.7	\$675.00	\$1,147.50
6/28/2022	JSW	Analysis of motion to terminate stay	0.2	\$395.00	\$79.00
6/29/2022	JSW	Strategize re opposition to motion to terminate stay	0.2	\$395.00	\$79.00
7/5/2022	JSW	Edit opposition to motion to terminate stay	0.1	\$395.00	\$39.50
7/7/2022	SKS	Draft opposition to LVDF relief from stay motion [2.1]	2.1	\$675.00	\$1,417.50
7/7/2022	JSW	Edit opposition to motion to terminate stay	0.5	\$395.00	\$197.50
7/8/2022	SKS	Draft opposition to LVDF relief from stay motion [3.1]	3.1	\$675.00	\$2,092.50
7/8/2022	JLB	Analysis of issues re additional arguments to be made re opposition to motion for Relief from Stay	0.5	\$575.00	\$287.50
7/10/2022	STG	Review opposition to motion for Relief from Stay.	0.5	\$895.00	\$447.50
7/11/2022	STG	Review final version of Remand and Relief from Stay oppositions by Debtor and UCC.	1.2	\$895.00	\$1,074.00
7/11/2022	SKS	Revise opposition to LVDF motion to terminate stay [1.0]	1.0	\$675.00	\$675.00
7/18/2022	SKS	Review LVDF reply to debtor's opposition to LVDF relief from stay motion [.4]	0.4	\$675.00	\$270.00
7/20/2022	JSW	Analysis of reply re motion to terminate stay, including analysis of numerous state court pleading attached to reply	1.8	\$395.00	\$711.00
7/24/2022	STG	Review relief from stay pleadings motion, opposition and reply for hearing on 25th	3.7	\$895.00	\$3,311.50
7/25/2022	JSW	Strategize re hearing on motion to terminate stay	0.3	\$395.00	\$118.50
8/25/2022	STG	Review reply to Opposition to MRS and relationship to Sanctions Motion.	0.5	\$895.00	\$447.50
8/25/2022	STG	Review and revise declaration in support of reply to Stay violation motion.	0.4	\$895.00	\$358.00



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Subtotal [180] Relief from Stay Proceedings			20.1		\$14,453.50
<u>[Lit] Litigation -</u>					
6/2/2022	STG	Review 2004 Applications [1.2]; analyse issues related to same [.4]	1.6	\$895.00	\$1,432.00
6/2/2022	SKS	Revise opposition to LVDF 2004 motions [.8]	0.8	\$675.00	\$540.00
6/2/2022	JLB	Strategy re seeking reconsideration of terminating sanctions order	0.2	\$575.00	\$115.00
6/3/2022	JLB	Analysis of strategy regarding potential removal of pending state court litigation	0.4	\$575.00	\$230.00
6/4/2022	JLB	Strategy re potentially seeking damages for stay violation in state court litigation	0.4	\$575.00	\$230.00
6/6/2022	JLB	Revise stay violation response letter to Andrea Champion	0.4	\$575.00	\$230.00
6/6/2022	JLB	Analysis of claims in state court litigation as estate property	0.3	\$575.00	\$172.50
6/7/2022	JLB	Revise letter to Brian Shapiro re damages for violation of stay	1.0	\$575.00	\$575.00
6/8/2022	JLB	Strategy re removal of litigation	0.3	\$575.00	\$172.50
6/13/2022	JLB	Strategy re notice of removal preparation	0.2	\$575.00	\$115.00
6/16/2022	YD	Analysis of State Court Docket and pull and format Documents for Notice of Removal.	4.6	\$280.00	\$1,288.00
6/16/2022	JLB	Draft notice of removal for bankruptcy court	1.0	\$575.00	\$575.00
6/16/2022	YD	Analysis of State Court Docket and pull and format Documents for Notice of Removal.	1.8	\$280.00	\$504.00
6/16/2022	JLB	Read state court documents related to preparing notice of removal	0.8	\$575.00	\$460.00
6/16/2022	YD	Research and review of State Court Docket and pull documents for Notice of Removal	1.2	\$280.00	\$336.00
6/16/2022	JLB	Strategize re preparing report of state court proceedings, related to removal notice	0.5	\$575.00	\$287.50
6/16/2022	YD	Research on Nevada Clark County State Court Website and review of Docket in Front Sight v. Las Vegas Dev Fund and pull same and format and email to J. Bagdanov and J. Wellington on same.	1.0	\$280.00	\$280.00
6/16/2022	JLB	Research authorities re removal process and documents needing inclusion	0.3	\$575.00	\$172.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/16/2022	JLB	Review district court general orders and rules re referral of bankruptcy cases	0.2	\$575.00	\$115.00
6/16/2022	JLB	Revise state court notice of removal pleading	0.2	\$575.00	\$115.00
6/16/2022	JT	Initial review of client's communications, call with S. Gubner re preparing declaration	0.3	\$270.00	\$81.00
6/16/2022	YD	Analysis of emails from T. Bixenbaum and J. Aldrich and J. Bagdanov re Notice of Removal and Supporting Documents; and review of attachments and respond to emails.	0.2	\$280.00	\$56.00
6/16/2022	YD	Tel conference with John Aldrich, Traci Bixenbaum and J. Bagdanov re Notice of Removal and Supporting Docket and Documents for same.	0.2	\$280.00	\$56.00
6/16/2022	YD	Analysis of emails from J. Bagdanov to J. Aldrich and T. Bixenbaum re State Court Docket and Pleadings for Notice of Removal of Action to bankruptcy court; and review of responses and reply to same regarding obtaining all documents filed in action.	0.2	\$280.00	\$56.00
6/16/2022	YD	Tel Conference with S. Gubner and conference with N. Fields re Notice of Removal and Documents attached and review of Docket and tel conferences with Court Clerks on same.	0.2	\$280.00	\$56.00
6/16/2022	YD	Analysis of email from J. Bagdanov re Notice of Removal and required documents from Nevada State Court Action; and review of Defendant's Answer and respond to email thereto.	0.2	\$280.00	\$56.00
6/17/2022	YD	Analysis of State Court Docket and pull and format Documents for Notice of Removal.	3.6	\$280.00	\$1,008.00
6/17/2022	JLB	Further strategy re removal process in light of voluminous court record	0.2	\$575.00	\$115.00
6/17/2022	YD	Analysis of documents downloaded for Notice of Removal of State Court Action.	0.4	\$280.00	\$112.00
6/17/2022	YD	Analysis of email from T. Bixenbaum and J. Aldrich re Notice of Removal and Supporting Documents and status thereof and Dropbox; and respond to email on same.	0.2	\$280.00	\$56.00
6/17/2022	YD	Tel conference with Court Clerk and N. Fields re Notice of Removal and Documents from State Court Court and filing of same.	0.2	\$280.00	\$56.00
6/20/2022	YD	Analysis of documents and DropBox from Traci Bixenbaum and upload state court action documents for Notice of Removal and format of same for J. Bagdanov Folde thereof.	1.0	\$280.00	\$280.00
6/20/2022	YD	Prep of email to J. Bagdanov re Notice of Removal and status of Downloads/Uploads of State Court Documents and bankruptcy court clerk on process for filing same.	0.2	\$280.00	\$56.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/20/2022	YD	Analysis of email from J. Treshinsky re STG Declaration and Supporting documents; and respond to email and documents on state court action.	0.2	\$280.00	\$56.00
6/21/2022	YD	Analysis of State Court Docket and pull and format Documents for Notice of Removal.	3.2	\$280.00	\$896.00
6/21/2022	YD	Finalize download of of State Court Dockets and pull and format Documents for Notice of Removal; and email to Traci Bixenbaum and J. Aldrich on completion of same.	1.6	\$280.00	\$448.00
6/21/2022	SKS	Review and revise notice of removal regarding state court litigation [.3]	0.3	\$675.00	\$202.50
6/21/2022	JLB	Further analysis of issues re removal of litigation	0.3	\$575.00	\$172.50
6/21/2022	JLB	Finalize notice of removal for bankruptcy court	0.2	\$575.00	\$115.00
6/21/2022	JLB	Revise bankruptcy notice of removal	0.2	\$575.00	\$115.00
6/21/2022	YD	Analysis of DropBox of Documents Uploaded and prep of email to T. Bixenbaum on same and ETA for completion and review of response and email reply on same and DropBox Issues.	0.4	\$280.00	\$112.00
6/21/2022	YD	Analysis of email from J. Bagdanov and review of Notice of Removal and State Court Notice of removing action and plan for filing and service of same.	0.2	\$280.00	\$56.00
6/21/2022	YD	Analysis of email from N. Fields re Court Clerk and response re Notice of Removal and Exhibits and review of underlying response from Clerk and J. Bagdanov response on same; and reply to N. Fields re Clerk issue.	0.2	\$280.00	\$56.00
6/21/2022	YD	Analysis of emails and revised/final version of Notice of Removal and N. Fileds emails on same and supporting Docket and Documents and email response on same and S. Gubner and S. Sefflin approval for filing thereof.	0.2	\$280.00	\$56.00
6/22/2022	YD	Analysis of emails from N. Fields re filing of Notice of Removal and Supporting Documents and issues with same; and review of documents downloaded from links and from T. Bixenbaum; and respond to N. Fields emails thereto for links.	1.2	\$280.00	\$336.00
6/22/2022	YD	Analysis of State Court/Clark County Docket and updates for Notice of Removal and Documents and format of same.	0.4	\$280.00	\$112.00
6/22/2022	YD	Analysis of email from J. Aldrich and T. Bixenbaum re Notice of Removal and Documents and respond to email and issue with Link.	0.2	\$280.00	\$56.00
6/22/2022	YD	Analysis of documents re Notice of Removal and Notice for State Court Action and email to N. Fields re status and Clerk of court issues and review of responses and reply thereto.	0.2	\$280.00	\$56.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/23/2022	SKS	Review expert witness report regarding EB-5 loans regarding LVDF litigation [.8]	0.8	\$675.00	\$540.00
6/23/2022	YD	Analysis of Downloaded Pleadings for attachment/filing to Notice of Removal and further breakup of same in batches for filing and work with N. Fields on same.	1.2	\$280.00	\$336.00
6/23/2022	SKS	Review correspondence from Andrea Champion regarding pre-petition TRO entered against debtor and draft response [.4]	0.4	\$675.00	\$270.00
6/23/2022	SKS	Research regarding effectiveness of pre-petition TRO against the debtor [.3]	0.3	\$675.00	\$202.50
6/23/2022	JLB	Analysis of issues re status of state court proceedings being provided to bankruptcy court	0.3	\$575.00	\$172.50
6/23/2022	JLB	Multiple emails to/from state court counsel re removal	0.2	\$575.00	\$115.00
6/23/2022	JLB	Analysis of issues re notifying state court of removal	0.2	\$575.00	\$115.00
6/23/2022	JLB	Strategy in finalizing notice of removal in light of information from court clerk	0.2	\$575.00	\$115.00
6/23/2022	JLB	Revise notice of removed action to be filed in state court	0.2	\$575.00	\$115.00
6/23/2022	JLB	Finalize notice of removed action for state court filing	0.2	\$575.00	\$115.00
6/23/2022	YD	Analysis of email and documents from N. Fields re filing of Notice of Removal of Clark County Action and respond to email and tel conference with N. Fields re Docket and formats of documents and process.	0.2	\$280.00	\$56.00
6/23/2022	YD	Analysis of email from S. Gubner re Notice of Removal and email from J. Aldrich on same and sanction order and notice of entry and respond to email and N. Fields re filing of Removal; and review of email from N. Fields confirming filing of removal and court issues and request for documents/downloaded and respond to N. Fields email.	0.2	\$280.00	\$56.00
6/23/2022	YD	Analysis of emails from J. Bagdanov and review of attachment of State Court Notice of Removal and J. Aldrich responses on same and filing and service thereof; and review of email from T. Bixenbaum on filed and served Notice.	0.2	\$280.00	\$56.00
6/24/2022	YD	Analysis of documents and preparation of OneDrive Link to State Court Documents to Traci Bixenbaum re Removed Clark County State Court Action; and email on same.	1.0	\$280.00	\$280.00
6/24/2022	JLB	Analysis of issues re preparing record of state court record	0.2	\$575.00	\$115.00
6/27/2022	SKS	Review pleadings from state court case regarding stay violation and analysis of issues regarding same [1.7]	1.7	\$675.00	\$1,147.50



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/27/2022	YD	Analysis of email from S. Sefflin re Supporting documents for Notice of Removal and review of documents and respond to email; and review of J. Bagdanov email on same.	0.2	\$280.00	\$56.00
7/15/2022	JT	Review client's comments to outlines	0.1	\$270.00	\$27.00
7/26/2022	STG	Telephone conference with S. Roth re: analysis on claims related to litigation.	0.5	\$895.00	\$447.50
8/2/2022	JT	Initial review and download of hearing transcripts and exhibits from Aldrich Law, emails with T. Bixenmann and J. Komorsky re same	0.7	\$270.00	\$189.00
8/8/2022	JT	Initial review and download of additional hearing transcripts from Aldrich Law, emails re same	0.2	\$270.00	\$54.00
Subtotal [Lit] Litigation -			42.5		\$17,414.00
Subtotal [5890.002] Front Sight Management Ch. 11 BK 22-11824			737.3		\$470,165.50
[5890.002.01]	Front Sight v. Las Vegas Development Fund (Removed Action) -				
5/31/2022	JSW	Draft stay LVDF stay violation letter [1.3]; strategize re the same [2]; Edit the letter [4]	1.9	\$395.00	\$750.50
5/31/2022	JSW	Further stratgize re stay violation letter [2]; coordinate service of the same [1 No Charge]	0.2	\$395.00	\$79.00
6/1/2022	STG	Review case law [1.1]and prepare letter to LVDH [3]	1.4	\$895.00	\$1,253.00
6/2/2022	STG	Telephone conference with Client [4]; Telephone conference with J/ Aldrich [3]; correspondence to Shapiro re: ongoing Stay violations and need to cease immediately [9]; review demand on Appraisal and coordinate same [6]	2.2	\$895.00	\$1,969.00
6/2/2022	JSW	Strategize re potentially filing a motion for reconsideration in the state court action with LVDF [1]; research Nevada state court rules for filing a motion for reconsideration [2]; research Nevada Rules of Civil Procedure regarding NRCP 60 motions [3]	0.6	\$395.00	\$237.00
6/2/2022	JSW	Analysis of issues re LVDF's violation of the automatic stay by proceeding with the state court action	0.5	\$395.00	\$197.50
6/2/2022	JSW	Review Counterclaim by LVDF in the state court action re potential stay violation	0.5	\$395.00	\$197.50
6/3/2022	STG	Review correspondence from Shapiro and correspondence from Lovelock re: stay violation [1.1]; Analyse issues re: Sanctions and stay violation [5]; review pending litigation in Sand diego [3]; Telephone conference with W. Cole re: stipulating to Relief from Stay [3]	2.2	\$895.00	\$1,969.00
6/3/2022	JSW	Analysis of letter from LVDF's counsel re stay violation	0.2	\$395.00	\$79.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/3/2022	JSW	Strategize re preparing supplemental declaration in support of DIP Financing Motion	0.2	\$395.00	\$79.00
6/3/2022	JSW	Review correspondence from Brian Shapiro re stay of state court litigation	0.1	\$395.00	\$39.50
6/4/2022	STG	Analyse issues further and enxt steps on LVDF failure to rectify stay violations and start draft on response [.5]; Telephone conference with client on Stay issues and likely response [.3];	0.8	\$895.00	\$716.00
6/4/2022	JSW	Strategize re response to Lovelock re stay violation letter	0.2	\$395.00	\$79.00
6/6/2022	JSW	Research re claims that are property of the estate re preparing response to Lovelock re stay violation letter [1]; draft response letter re the same [2.7]	3.7	\$395.00	\$1,461.50
6/6/2022	STG	Telephone conference with Personal counsel for ignatius re:upcoming depositions [.5];	0.5	\$895.00	\$447.50
6/6/2022	JSW	Edit response letter to Lovelock re stay violation	0.3	\$395.00	\$118.50
6/6/2022	JSW	Strategize re response to Lovelock letter re stay violation	0.2	\$395.00	\$79.00
6/7/2022	STG	Telephone conference with Client re: upcoming first day hearings [.5]; review state court pleadings and final version of Stay Sanctions letter [1.1]	1.6	\$895.00	\$1,432.00
6/7/2022	JSW	Strategize re response to Lovelock letter re stay violation	0.2	\$395.00	\$79.00
6/8/2022	JSW	Analysis of issues re Shapiro's response to stay violation letter	0.3	\$395.00	\$118.50
6/16/2022	JSW	Strategize re removal of state court action	0.6	\$395.00	\$237.00
6/16/2022	JSW	Edit notice of removal	0.5	\$395.00	\$197.50
6/27/2022	JLB	Analysis of strategy re motion for reconsideration and timing of same	0.9	\$575.00	\$517.50
6/27/2022	JSW	Strategize re stay violation motion and motion for declaratory relief [.2]; draft motion re the same [.9]	1.1	\$395.00	\$434.50
6/27/2022	JSW	Further strategize re motion for violation of the stay	0.8	\$395.00	\$316.00
6/27/2022	SKS	Review motion filed by LVDF to terminate the stay regarding the state court action [.3]; prepare correspondence to client regarding same [.1]	0.4	\$675.00	\$270.00
6/27/2022	SKS	Review motion to remand state court action [.2]; draft correspondence to client regarding same [.1]	0.3	\$675.00	\$202.50
6/27/2022	JSW	Further strategize re motion for stay violation	0.4	\$395.00	\$158.00
6/28/2022	JLB	Strategy re responding to mulitple motions filed by LVDF	1.0	\$575.00	\$575.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
6/28/2022	JSW	Research standard under Rule 60(b)	1.4	\$395.00	\$553.00
6/28/2022	JSW	Draft Rule 60(b) motion and motion for violation of stay	1.1	\$395.00	\$434.50
6/28/2022	JSW	Analysis of pleadings filed in state court re preparing Rule 60(b) motion and motion re violation of stay	1.0	\$395.00	\$395.00
6/28/2022	JLB	Analysis of statutory standards re seeking to have terminating sanctions order deemed void	0.5	\$575.00	\$287.50
6/28/2022	JSW	Strategize re Rule 60(b) and motion for violation of stay	0.7	\$395.00	\$276.50
6/28/2022	JSW	Analysis of motion to remand	0.5	\$395.00	\$197.50
6/28/2022	JSW	Analysis of issues re Rule 60(b) motion	0.3	\$395.00	\$118.50
6/29/2022	JBK	Research and continue drafting opposition to motion for remand. (4.3)	4.3	\$675.00	\$2,902.50
6/29/2022	JSW	Draft motion for violation of stay	3.0	\$395.00	\$1,185.00
6/29/2022	JSW	Further draft motion for violation of stay	2.5	\$395.00	\$987.50
6/29/2022	JSW	Further draft motion for violation of the stay	1.3	\$395.00	\$513.50
6/29/2022	JLB	Strategy re preclusive implications of terminating sanctions order on debtor	0.4	\$575.00	\$230.00
6/30/2022	JBK	Continue researching and drafting opposition to motion for remand (4.8)	4.8	\$675.00	\$3,240.00
6/30/2022	JSW	Edit motion for stay violation [2]; further draft the same [.4]	2.4	\$395.00	\$948.00
6/30/2022	JSW	Further draft motion for violation of stay	1.6	\$395.00	\$632.00
6/30/2022	JLB	Analyze argument in support of opposition to motion for remand	0.5	\$575.00	\$287.50
6/30/2022	JSW	Gather exhibits for RJN in support of motion re violation of stay [.4]; draft RJN re the same [.3]	0.7	\$395.00	\$276.50
6/30/2022	JSW	Further strategize re motion for violation of stay	0.6	\$395.00	\$237.00
6/30/2022	JSW	Draft declaration of S. Gubner in support of motion re violation of stay	0.4	\$395.00	\$158.00
6/30/2022	JLB	Analysis of issues re opposition to motion for remand and	0.2	\$575.00	\$115.00
6/30/2022	JSW	Strategize re motion for remand	0.2	\$395.00	\$79.00
7/5/2022	JLB	Revise motion to confirm terminating sanctions order void in violation of stay	1.2	\$575.00	\$690.00
7/5/2022	JLB	Revise opposition to motion for remand	0.4	\$575.00	\$230.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/5/2022	JLB	Research authorities related to stay violation motion	0.4	\$575.00	\$230.00
7/5/2022	JSW	Edit motion re violation of automatic stay	0.5	\$395.00	\$197.50
7/5/2022	YD	Analysis of documents from state court action uploaded and filed in parts and emails of same from N. Fields; and conference with N. Fields with same and court isuses and releases of link to upload documents.	0.6	\$280.00	\$168.00
7/5/2022	JSW	Edit opposition to motion to remand	0.4	\$395.00	\$158.00
7/5/2022	JSW	Further edit motion re violation of stay	0.3	\$395.00	\$118.50
7/5/2022	JSW	Strategize re finalizing terminating sanctions motion	0.3	\$395.00	\$118.50
7/5/2022	JLB	Further revise motion re stay violation	0.2	\$575.00	\$115.00
7/5/2022	JLB	Strategize re finalizing terminating sanctions motion	0.2	\$575.00	\$115.00
7/5/2022	JSW	Strategize motion re violation of stay	0.1	\$395.00	\$39.50
7/6/2022	JBK	Revise and finalize motion to set aside judgment as void and for Rule 60(b) relief.	2.9	\$675.00	\$1,957.50
7/6/2022	SKS	Review and revise motion for order that terminating sanctions order is void [2.7]	2.7	\$675.00	\$1,822.50
7/6/2022	SKS	Research regarding applicability of the stay to a removed action [.8]	0.8	\$675.00	\$540.00
7/6/2022	JSW	Further edit motion re stay violation	1.2	\$395.00	\$474.00
7/6/2022	YD	Research and review of Adv Docket and uploaded Parts of State Court Docket filing of pleadings for removal action and email to N. Fields on same.	1.2	\$280.00	\$336.00
7/6/2022	JLB	Further revise motion for stay violation	0.5	\$575.00	\$287.50
7/6/2022	JLB	Analysis of issues re: additional arguments to be made in responding to motion for remand connected to issues in stay violation motion	0.4	\$575.00	\$230.00
7/6/2022	JSW	Analysis of issues re finalizing motion re stay violation	0.5	\$395.00	\$197.50
7/6/2022	JLB	Analysis of issues re finalizing evidence in support of stay violation motion	0.3	\$575.00	\$172.50
7/6/2022	JSW	Further analysis of issues re finalizing motion re violation of stay	0.4	\$395.00	\$158.00
7/6/2022	JSW	Review finalized motion re stay violation to ensure accuracy	0.4	\$395.00	\$158.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/6/2022	JSW	Strategize re issues re additional arguments re motion for remand and stay violation	0.4	\$395.00	\$158.00
7/6/2022	JSW	Draft notice of motion re stay violation	0.3	\$395.00	\$118.50
7/6/2022	JSW	Edit motion re stay violation [.1]; edit request for judicial notice in support of the same [.1]; edit declaration of S. Gubner in support of the same [.1]	0.3	\$395.00	\$118.50
7/6/2022	JSW	Further analysis of issues re finalizing motion re stay violation	0.3	\$395.00	\$118.50
7/6/2022	JLB	Research authorities related to finalizing stay violation motion	0.2	\$575.00	\$115.00
7/6/2022	JLB	Revise notice of hearing re stay violation motion	0.1	\$575.00	\$57.50
7/6/2022	JLB	Revise Gubner decl in support of stay violation motion	0.1	\$575.00	\$57.50
7/6/2022	JLB	Revise request for judicial notice in support of stay violation motion	0.1	\$575.00	\$57.50
7/6/2022	JSW	Finalize exhibits re motion re stay violation	0.1	\$395.00	\$39.50
7/6/2022	JSW	Further edit motion re stay violation	0.1	\$395.00	\$39.50
7/7/2022	JBK	Continue researching and drafting opposition to motion to remand (2.2); continue researching and drafting opposition to motion to lift stay (1.6)	3.8	\$675.00	\$2,565.00
7/7/2022	SKS	Revise opposition to remand motion [1.7]	1.7	\$675.00	\$1,147.50
7/7/2022	SKS	Research regarding remand [.6]	0.6	\$675.00	\$405.00
7/7/2022	SKS	Review emails (multiple) from Dawn Cica regarding remand motion and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
7/8/2022	JBK	Continue researching opposition to motion to remand (1.3); continue drafting opposition to motion to lift stay (3.4); finalize opposition to motion appoint examiner (.9)	5.6	\$675.00	\$3,780.00
7/8/2022	YD	Analysis of email from N. Felds re Notice of Removal and Notice of Removal Notice and supporting documents; and review of files and respond to email thereto.	0.2	\$280.00	\$56.00
7/10/2022	SKS	Draft correspondence (multiple) to Steve Gubner regarding litigation and whether the committee should intervene [.8]	0.8	\$675.00	\$540.00
7/11/2022	JBK	Revise opposition to motion to remand (1); draft request for judicial notice and gather documents (.8); research and draft objection to late-filed substantive joinder (2.1); revise opposition to motion to terminate stay (1.3).	5.2	\$675.00	\$3,510.00
7/11/2022	SKS	Revise opposition to remand motion [1.6]	1.6	\$675.00	\$1,080.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
7/11/2022	STG	Review motion to intervene by UCC [.5]; Telephone conference with B. Lehane re: UCC intervention [.2]	0.7	\$895.00	\$626.50
7/11/2022	SKS	Conversation with Bob LeHane regarding committee motion to intervene in adversary and related issues [.7]	0.7	\$675.00	\$472.50
7/11/2022	SKS	Review committee's motion to intervene [.4]	0.4	\$675.00	\$270.00
7/12/2022	JBK	Review documents provided by state court counsel for the Debtor.	2.1	\$675.00	\$1,417.50
7/12/2022	JSW	Analysis of issues re LVDF litigation	0.2	\$395.00	\$79.00
7/15/2022	SKS	Review opposition to motion to strike filed by Dzuibla et al [.2]	0.2	\$675.00	\$135.00
7/18/2022	JBK	Analyze LVDF's reply in support of motion to remand and to lift stay. 1.3.	1.3	\$675.00	\$877.50
7/18/2022	SKS	Review LVDF reply to opposition to remand motion and review exhibits [.7]	0.7	\$675.00	\$472.50
7/18/2022	JSW	Analysis of reply to opposition to motion to remand	0.3	\$395.00	\$118.50
7/18/2022	JSW	Analysis of motion for reconsideration filed by Dr. Piazza, Jennifer Piazza, and the Dynasty Trusts	0.3	\$395.00	\$118.50
7/18/2022	JSW	Review Court's order granting UCC's OST re motion to intervene	0.1	\$395.00	\$39.50
7/19/2022	SKS	Review pleadings and orders in state court action related to estimation and objection to claim [1.7]	1.7	\$675.00	\$1,147.50
7/20/2022	JBK	Analyze reply in further support of motion for remand (1); Analyze oppositon to motion to intervene (.6).	1.6	\$675.00	\$1,080.00
7/20/2022	JT	Emails re document productions in removed action, initial review of and download Defendant's document productions	1.1	\$270.00	\$297.00
7/20/2022	JT	Review and analysis of discovery responses	1.1	\$270.00	\$297.00
7/20/2022	SKS	Review LVDF opposition to committee motion to intervene [.2]; prepare correspondence to committee counsel regarding same [.1]	0.3	\$675.00	\$202.50
7/20/2022	JT	Initial review of and download Plaintiff's disclosures and document production, email to S. Sefflin re same	0.7	\$270.00	\$189.00
7/21/2022	JT	Attention to and review status of subpoenas to be served	0.2	\$270.00	\$54.00
7/22/2022	JBK	Prepare for hearing on motion to remand and motion to lift stay.	3.1	\$675.00	\$2,092.50
7/25/2022	JBK	Continue preparation for removed action motions and argue oppositon to motion for remand.	4.8	\$675.00	\$3,240.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
8/2/2022	SKS	Conversation with committee counsel regarding committee request for documents from LVDF [.2]	0.2	\$675.00	\$135.00
8/7/2022	SKS	Review 9011 motion served by Brian Shapiro regarding debtor motion to set aside terminating sanctions order [.3]	0.3	\$675.00	\$202.50
8/7/2022	JLB	Review Rule 11 motion served by Brian Shapiro relating to motion to void terminating sanctions order.	0.2	\$575.00	\$115.00
8/8/2022	JLB	Research issues related to response to Shapiro Rule 11 motion	0.4	\$575.00	\$230.00
8/9/2022	STG	Review letter from Shapiro and caselaw on liability of bankruptcy lawyer not making appearance related to stay violation [1.1]; further review of Shapiro response to stay violation [1.8]	2.9	\$895.00	\$2,595.50
8/9/2022	JBK	Conference call regarding next steps in bankruptcy.	1.2	\$675.00	\$810.00
8/10/2022	JBK	Review and revise letter to B. Shapiro re: ongoing obligation to rectify violation of stay.	1.0	\$675.00	\$675.00
8/11/2022	STG	Review claim re: voiding actions taken in violation [.7]; review, modify and finalize letter to shapiro re: failure to remediate stay violations [.4]	1.1	\$895.00	\$984.50
8/11/2022	JSW	Further research re Rule 11 motion from Shapiro	1.3	\$395.00	\$513.50
8/18/2022	SKS	Review LVDF opposition to Piazza et al motion for reconsideration of terminating sanctions order [.3]	0.3	\$675.00	\$202.50
8/18/2022	SKS	Review Shapiro opposition to debtor's motion for entry of an order confirming terminating sanctions order is void [.2]	0.2	\$675.00	\$135.00
8/19/2022	JSW	Review oppositions to motion re stay violation	1.5	\$395.00	\$592.50
8/19/2022	JLB	Strategy re preparation of reply in support of motion to void terminating sanctions order	0.5	\$575.00	\$287.50
8/24/2022	JSW	Draft reply to LVDF and Jones Lovelock's opposition re motion re stay violation	3.4	\$395.00	\$1,343.00
8/24/2022	SKS	Revise debtor's reply to Shapiro's opposition to debtor's motion for order determining that terminating sanctions order is void [1.5]	1.5	\$675.00	\$1,012.50
8/24/2022	JSW	Draft reply to opposition to Debtor's motion re stay violation filed by Shapiro	2.3	\$395.00	\$908.50
8/24/2022	JBK	Research and revise reply brief in further support of motion finding violation of automatic stay.	1.3	\$675.00	\$877.50
8/24/2022	JSW	Draft reply to LVDF and Jones Lovelock opposition to motion re stay violation	1.3	\$395.00	\$513.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
8/24/2022	JSW	Further draft reply to LVDF and Jones Lovelock's opposition re stay violation motion	1.2	\$395.00	\$474.00
8/24/2022	JSW	Strategize re reply to LVDF's opposition re motion re stay violation	0.2	\$395.00	\$79.00
8/25/2022	JBK	Revise reply brief in further support of violation of the stay.	2.1	\$675.00	\$1,417.50
8/25/2022	STG	Review Reply to Shapiro Oppo to Debtor's Order re Terminating Sanctions.	1.4	\$895.00	\$1,253.00
8/25/2022	SKS	Research ability to prime existing loans through exit financing [1.6]	1.6	\$675.00	\$1,080.00
8/25/2022	SKS	Revise debtor's reply to LVDF and Jones Lovelock opposition to debtor's motion for order determining that terminating sanctions order is void [1.1]	1.1	\$675.00	\$742.50
8/25/2022	JSW	Edit reply to opposition to LVDF and Jones Lovelock's opposition re stay violation motion	0.9	\$395.00	\$355.50
8/25/2022	JLB	Efforts to finalize evidence in support of reply re stay violation motion	0.4	\$575.00	\$230.00
8/25/2022	JSW	Analysis of issues re replies to oppositions to Debtor's motion re stay violation	0.5	\$395.00	\$197.50
8/25/2022	JLB	Strategy re finalizing reply in support of stay violation motion	0.3	\$575.00	\$172.50
8/25/2022	JSW	Further edit reply to LVDF's opposition re Debtor's motion for violation of the stay	0.4	\$395.00	\$158.00
8/25/2022	JSW	Review finalized reply to Shapiro opposition re stay violation motion [.1]; review finalized reply to LVDF's opposition to the same [.1]; review finalized RJN in support of the reply [.1]; review finalized declaration in support of the reply [.1]	0.4	\$395.00	\$158.00
8/25/2022	SKS	Conversation with Teresa Pilatowicz regarding responses due to LVDF oppositions in adversary [.2]	0.2	\$675.00	\$135.00
8/25/2022	JSW	Edit reply to Shapiro's opposition to Debtor's motion for violation of stay	0.3	\$395.00	\$118.50
8/25/2022	JSW	Draft declaration of S. Gubner in support of Debtor's reply to Shapiro's opposition re stay violation motion	0.3	\$395.00	\$118.50
8/25/2022	JSW	Draft request for judicial notice in support of the Debtor's reply to LVDF and Jones Lovelock's opposition re motion for stay violation	0.2	\$395.00	\$79.00
8/25/2022	JSW	Strategize re replies to oppositions to Debtor's motion re stay violation	0.2	\$395.00	\$79.00
8/25/2022	JSW	Further edit reply to LVDF's opposition to Debtor's stay motion	0.1	\$395.00	\$39.50



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
8/30/2022	JSW	Multiple correspondence with Traci Bixenmann re Jeffrey Porter expert opinion [.2]; analysis of the same [.2]	0.4	\$395.00	\$158.00
8/31/2022	STG	Prepare for hearing on Motion for terminating sanctions.	3.3	\$895.00	\$2,953.50
8/31/2022	JBK	Prepare for hearing on sanctions motion.	3.1	\$675.00	\$2,092.50
8/31/2022	SKS	Analysis of issues in preparation for hearing on motion to void terminating sanctions order [.6]	0.6	\$675.00	\$405.00

[180] Relief from Stay Proceedings

8/8/2022	JSW	Research regarding Shapiro's Rule 11 motion re motion to confirm the terminating sanctions order violated the automatic stay [2.3]; draft memorandum re the same [.6]; strategize re the same [.2]	3.1	\$395.00	\$1,224.50
8/10/2022	JSW	Draft response to Rule 11 Motion by Brian Shapiro	1.7	\$395.00	\$671.50
8/10/2022	JSW	Strategize re response to Shapiro's Rule 11 Motion re motion for violation of the stay [.4]; edit response re the same [.4];	0.8	\$395.00	\$316.00
Subtotal [180] Relief from Stay Proceedings			5.6		\$2,212.00
Subtotal [5890.002.01] Front Sight v. Las Vegas Development Fund (Removed			157.1		\$91,023.00

[5890.002.02] Objection to LVDF Claim

[120] Claims Admin

7/28/2022	JBK	Begin drafting objection to LVDF claim.	3.4	\$675.00	\$2,295.00
7/28/2022	JBX	Call w/ JBK re: factual and strategic support for claims objection [.4]	0.4	\$675.00	\$270.00
7/29/2022	JBX	Call w/ JBK re: merits and strategy with respect to claim objection [.5]; initial review of certain loan and billing documents supporting objection to claim [.8]	1.3	\$675.00	\$877.50
7/30/2022	JBX	Attention to revising the draft objection to LVDF's claim, including also call and correspondence w/ JBK re: same [3.4]	3.4	\$675.00	\$2,295.00
7/31/2022	JBX	Further revise objection to LVDF claim, including also exchanging correspondence re: same [1.1]	1.1	\$675.00	\$742.50
8/1/2022	JBK	Finalize draft of objection to LVDF claim.	1.8	\$675.00	\$1,215.00
8/2/2022	JBK	Marshall evidence in support of objection to claim	2.1	\$675.00	\$1,417.50
8/11/2022	STG	Review LVDF claims and outline objections.	1.8	\$895.00	\$1,611.00
8/16/2022	JBK	Review LVDF claim and revise objection to LVDF claim accordingly.	1.0	\$675.00	\$675.00



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For the period from 5/24/2022 through 8/31/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
8/19/2022	STG	Review Analysis on objections [1.1]; review loan documents of lvdf [1.7]	2.8	\$895.00	\$2,506.00
8/23/2022	STG	Review objection claim [.3]; analyse issues re: discovery impact on contested matter [.8]	1.1	\$895.00	\$984.50
Subtotal [120] Claims Admin			20.2		\$14,889.00
Subtotal [5890.002.02] Objection to LVDF Claim			20.2		\$14,889.00
[5890.002.04] Meacher Claim Objection					
8/12/2022	JSW	Further draft outline for 2004 exam of Dianne Meacher	2.4	\$395.00	\$948.00
8/12/2022	JSW	Draft outline for 2004 exam of Dianne Meacher	1.5	\$395.00	\$592.50
8/16/2022	SKS	Review correspondence (multiple) and documents regarding deposition of Mrs. Meacher and prepare correspondence regarding same [.5]	0.5	\$675.00	\$337.50
Subtotal [5890.002.04] Meacher Claim Objection			4.4		\$1,878.00
Total Fees for Professional Services Rendered:			919.0		\$577,955.50



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EXHIBIT 1 (CONTINUED) - PROFESSIONAL RATE SUMMARY			For 2022	For the period from 5/24/2022 through 8/31/2022		
Initials	Prof Name	Prof Type	Rate/Hr	Hours	Blended Rate	Amount
JBK	Jason B. Komorsky	Partner	\$675.00	94.8		\$63,990.00
JBX	Jerrold L. Bregman	Partner	\$675.00	6.2		\$4,185.00
JLB	Jessica L. Bagdanov	Partner	\$575.00	43.9		\$24,840.00
JSW	Jessica S. Wellington	Associate	\$395.00	207.7		\$79,987.50
JT	Juanita Treshinsky	Paralegal	\$270.00	11.9		\$3,132.00
RFC	Ryan F. Coy	Associate	\$395.00	0.1		\$0.00
SKS	Susan K. Seflin	Partner	\$675.00	313.2		\$211,207.50
STG	Steven T. Gubner	Equity Partner	\$895.00	202.6		\$179,805.50
YD	Yves Derac	Paralegal	\$280.00	38.6		\$10,808.00
Total				919.0	\$628.90	\$577,955.50



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EXHIBIT 1 (CONTINUED) - MATTER RATE SUMMARY

<u>Matter ID</u>	<u>Matter Desc</u>	<u>Hours</u>	<u>Amount</u>
5890.002	Front Sight Management Ch. 11 BK 22-11824	737.3	\$470,165.50
	Asset Analysis & Recovery	8.6	\$5,381.00
	Asset Disposition	7.5	\$4,830.50
	Business Operations	83.6	\$57,512.50
	Case Administration	123.7	\$84,934.50
	Claims Admin	140.9	\$85,354.00
	Fee/Employment Applications	62.4	\$29,673.50
	Fee/Employment Objections	11.4	\$5,687.00
	Financing	78.0	\$55,074.00
	Meeting of Creditors	13.8	\$12,329.00
	Plan & Disclosure Statement	144.8	\$97,522.00
	Relief from Stay Proceedings	20.1	\$14,453.50
	Litigation -	42.5	\$17,414.00
5890.002.01	Front Sight v. Las Vegas Development Fund (Removed Action) -	157.1	\$91,023.00
	Relief from Stay Proceedings	5.6	\$2,212.00
5890.002.02	Objection to LVDF Claim	20.2	\$14,889.00
	Claims Admin	20.2	\$14,889.00
5890.002.04	Meacher Claim Objection	4.4	\$1,878.00
	Grand Total	919.0	\$577,955.50



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EXHIBIT 1 (CONTINUED) - BILLING RECORD SUMMARY	Fees	Costs	Total
[5890.002] Front Sight Management Ch. 11 BK 22-11824	\$470,165.50	\$13,543.36	\$483,708.86
Subtotal [100] Asset Analysis & Recovery	\$5,381.00		\$5,381.00
Subtotal [105] Asset Disposition	\$4,830.50		\$4,830.50
Subtotal [110] Business Operations	\$57,512.50		\$57,512.50
Subtotal [115] Case Administration	\$84,934.50		\$84,934.50
Subtotal [120] Claims Admin	\$85,354.00		\$85,354.00
Subtotal [130] Fee/Employment Applications	\$29,673.50		\$29,673.50
Subtotal [135] Fee/Employment Objections	\$5,687.00		\$5,687.00
Subtotal [140] Financing	\$55,074.00		\$55,074.00
Subtotal [160] Meeting of Creditors	\$12,329.00		\$12,329.00
Subtotal [170] Plan & Disclosure Statement	\$97,522.00		\$97,522.00
Subtotal [180] Relief from Stay Proceedings	\$14,453.50		\$14,453.50
Subtotal [Lit] Litigation -	\$17,414.00		\$17,414.00
[5890.002.01] Front Sight v. Las Vegas Development Fund (Removed)	\$91,023.00	\$36.86	\$91,059.86
Subtotal [180] Relief from Stay Proceedings	\$2,212.00		\$2,212.00
[5890.002.02] Objection to LVDF Claim	\$14,889.00		\$14,889.00
Subtotal [120] Claims Admin	\$14,889.00		\$14,889.00
[5890.002.04] Meacher Claim Objection	\$1,878.00		\$1,878.00
Total	\$577,955.50	\$13,580.22	\$591,535.72

EXHIBIT 2



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EXHIBIT 2 - PROFESSIONAL FEES ACTIVITY SUMMARY

<u>Matter</u>	<u>Initials</u>	<u>Prof Name</u>	<u>Prof Type</u>	<u>Hours</u>	<u>Avg Rate/Hr</u>	<u>Amount</u>
5890.002		Front Sight Management Ch. 11 BK 22-11824				
		[100] Asset Analysis & Recovery				
	JBK	Jason B. Komorsky	Partner	4.1	\$675.00	\$2,767.50
	JLB	Jessica L. Bagdanov	Partner	1.3	\$442.31	\$575.00
	SKS	Susan K. Seflin	Partner	2.9	\$675.00	\$1,957.50
	JT	Juanita Treshinsky	Paralegal	0.3	\$270.00	\$81.00
		[100] Asset Analysis & Recovery Subtotal		8.6		\$5,381.00
		[105] Asset Disposition				
	SKS	Susan K. Seflin	Partner	5.3	\$675.00	\$3,577.50
	STG	Steven T. Gubner	Equity Partner	1.4	\$895.00	\$1,253.00
	JSW	Jessica S. Wellington	Associate	0.8	\$0.00	\$0.00
		[105] Asset Disposition Subtotal		7.5		\$4,830.50
		[110] Business Operations				
	JLB	Jessica L. Bagdanov	Partner	2.9	\$495.69	\$1,437.50
	SKS	Susan K. Seflin	Partner	43.7	\$675.00	\$29,497.50
	STG	Steven T. Gubner	Equity Partner	24.4	\$895.00	\$21,838.00
	JSW	Jessica S. Wellington	Associate	10.9	\$395.00	\$4,305.50
	JT	Juanita Treshinsky	Paralegal	1.5	\$252.00	\$378.00
	YD	Yves Derac	Paralegal	0.2	\$280.00	\$56.00
		[110] Business Operations Subtotal		83.6		\$57,512.50
		[115] Case Administration				
	JBK	Jason B. Komorsky	Partner	16.3	\$675.00	\$11,002.50
	JLB	Jessica L. Bagdanov	Partner	0.9	\$575.00	\$517.50
	SKS	Susan K. Seflin	Partner	51.5	\$675.00	\$34,762.50
	STG	Steven T. Gubner	Equity Partner	38.4	\$855.38	\$32,846.50
	JSW	Jessica S. Wellington	Associate	13.2	\$374.05	\$4,937.50
	RFC	Ryan F. Coy	Associate	0.1	\$0.00	\$0.00
	JT	Juanita Treshinsky	Paralegal	2.9	\$260.69	\$756.00
	YD	Yves Derac	Paralegal	0.4	\$280.00	\$112.00
		[115] Case Administration Subtotal		123.7		\$84,934.50
		[120] Claims Admin				
	JBK	Jason B. Komorsky	Partner	9.9	\$675.00	\$6,682.50
	JLB	Jessica L. Bagdanov	Partner	9.4	\$575.00	\$5,405.00
	SKS	Susan K. Seflin	Partner	24.9	\$666.87	\$16,605.00
	STG	Steven T. Gubner	Equity Partner	40.4	\$895.00	\$36,158.00
	JSW	Jessica S. Wellington	Associate	53.3	\$369.80	\$19,710.50
	JT	Juanita Treshinsky	Paralegal	2.0	\$256.50	\$513.00
	YD	Yves Derac	Paralegal	1.0	\$280.00	\$280.00



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EXHIBIT 2 - PROFESSIONAL FEES ACTIVITY SUMMARY

<u>Matter</u>	<u>Initials</u>	<u>Prof Name</u>	<u>Prof Type</u>	<u>Hours</u>	<u>Avg Rate/Hr</u>	<u>Amount</u>
			[120] Claims Admin Subtotal	140.9		\$85,354.00
[130] Fee/Employment Applications						
	JLB	Jessica L. Bagdanov	Partner	4.0	\$575.00	\$2,300.00
	SKS	Susan K. Seflin	Partner	11.2	\$675.00	\$7,560.00
	STG	Steven T. Gubner	Equity Partner	4.6	\$895.00	\$4,117.00
	JSW	Jessica S. Wellington	Associate	33.8	\$391.49	\$13,232.50
	YD	Yves Derac	Paralegal	8.8	\$280.00	\$2,464.00
			[130] Fee/Employment Applications Subtotal	62.4		\$29,673.50
[135] Fee/Employment Objections						
	JLB	Jessica L. Bagdanov	Partner	0.2	\$575.00	\$115.00
	SKS	Susan K. Seflin	Partner	4.1	\$675.00	\$2,767.50
	JSW	Jessica S. Wellington	Associate	7.1	\$395.00	\$2,804.50
			[135] Fee/Employment Objections Subtotal	11.4		\$5,687.00
[140] Financing						
	JBK	Jason B. Komorsky	Partner	6.3	\$675.00	\$4,252.50
	JLB	Jessica L. Bagdanov	Partner	3.2	\$575.00	\$1,840.00
	SKS	Susan K. Seflin	Partner	53.3	\$675.00	\$35,977.50
	STG	Steven T. Gubner	Equity Partner	14.2	\$895.00	\$12,709.00
	JSW	Jessica S. Wellington	Associate	0.2	\$395.00	\$79.00
	JT	Juanita Treshinsky	Paralegal	0.8	\$270.00	\$216.00
			[140] Financing Subtotal	78.0		\$55,074.00
[160] Meeting of Creditors						
	SKS	Susan K. Seflin	Partner	0.1	\$675.00	\$67.50
	STG	Steven T. Gubner	Equity Partner	13.7	\$895.00	\$12,261.50
			[160] Meeting of Creditors Subtotal	13.8		\$12,329.00
[170] Plan & Disclosure Statement						
	JLB	Jessica L. Bagdanov	Partner	3.5	\$575.00	\$2,012.50
	SKS	Susan K. Seflin	Partner	85.7	\$675.00	\$57,847.50
	STG	Steven T. Gubner	Equity Partner	31.4	\$895.00	\$28,103.00
	JSW	Jessica S. Wellington	Associate	24.2	\$395.00	\$9,559.00
			[170] Plan & Disclosure Statement Subtotal	144.8		\$97,522.00
[180] Relief from Stay Proceedings						
	JBK	Jason B. Komorsky	Partner	1.7	\$675.00	\$1,147.50
	JLB	Jessica L. Bagdanov	Partner	0.5	\$575.00	\$287.50
	SKS	Susan K. Seflin	Partner	6.6	\$675.00	\$4,455.00
	STG	Steven T. Gubner	Equity Partner	8.2	\$895.00	\$7,339.00
	JSW	Jessica S. Wellington	Associate	3.1	\$395.00	\$1,224.50
			[180] Relief from Stay Proceedings Subtotal	20.1		\$14,453.50



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EXHIBIT 2 - PROFESSIONAL FEES ACTIVITY SUMMARY

<u>Matter</u>	<u>Initials</u>	<u>Prof Name</u>	<u>Prof Type</u>	<u>Hours</u>	<u>Avg Rate/Hr</u>	<u>Amount</u>
[Lit] Litigation -						
	JLB	Jessica L. Bagdanov	Partner	8.6	\$575.00	\$4,945.00
	SKS	Susan K. Seflin	Partner	4.3	\$675.00	\$2,902.50
	STG	Steven T. Gubner	Equity Partner	2.1	\$895.00	\$1,879.50
	JT	Juanita Treshinsky	Paralegal	1.3	\$270.00	\$351.00
	YD	Yves Derac	Paralegal	26.2	\$280.00	\$7,336.00
[Lit] Litigation - Subtotal				42.5		\$17,414.00
5890.002 Front Sight Management Ch. 11 BK 22-11824 Subtotal				737.3		\$470,165.50
5890.002.01 Front Sight v. Las Vegas Development Fund (Removed Action) -						
	JBK	Jason B. Komorsky	Partner	48.2	\$675.00	\$32,535.00
	JLB	Jessica L. Bagdanov	Partner	9.4	\$575.00	\$5,405.00
	SKS	Susan K. Seflin	Partner	19.1	\$675.00	\$12,892.50
	STG	Steven T. Gubner	Equity Partner	18.1	\$895.00	\$16,199.50
	JSW	Jessica S. Wellington	Associate	51.6	\$395.00	\$20,382.00
	JT	Juanita Treshinsky	Paralegal	3.1	\$270.00	\$837.00
	YD	Yves Derac	Paralegal	2.0	\$280.00	\$560.00
[180] Relief from Stay Proceedings						
	JSW	Jessica S. Wellington	Associate	5.6	\$395.00	\$2,212.00
[180] Relief from Stay Proceedings Subtotal				5.6		\$2,212.00
5890.002.01 Front Sight v. Las Vegas Development Fund (Removed Action) - Subtotal				157.1		\$91,023.00
5890.002.02 Objection to LVDF Claim						
[120] Claims Admin						
	JBK	Jason B. Komorsky	Partner	8.3	\$675.00	\$5,602.50
	JBX	Jerrold L. Bregman	Partner	6.2	\$675.00	\$4,185.00
	STG	Steven T. Gubner	Equity Partner	5.7	\$895.00	\$5,101.50
[120] Claims Admin Subtotal				20.2		\$14,889.00
5890.002.02 Objection to LVDF Claim Subtotal				20.2		\$14,889.00
5890.002.04 Meacher Claim Objection						
	SKS	Susan K. Seflin	Partner	0.5	\$675.00	\$337.50
	JSW	Jessica S. Wellington	Associate	3.9	\$395.00	\$1,540.50
5890.002.04 Meacher Claim Objection Subtotal				4.4		\$1,878.00
Total Fees for Professional Services Rendered:				919.0	\$628.90	\$577,955.50

EXHIBIT 3



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EXHIBIT 3 - MONTHLY FEE SUMMARY	May 2022	Jun 2022	Jul 2022	Aug 2022	Total
Matter	Amount Hours	Amount Hours	Amount Hours	Amount Hours	Amount Hours
5890.002	<u>\$55,526.50</u>	<u>\$156,109.50</u>	<u>\$142,404.00</u>	<u>\$116,125.50</u>	<u>\$470,165.50</u>
Front Sight Management Ch. 11 BK 22-11824	83.1	248.4	221.2	184.6	737.3
[100] Asset Analysis & Recovery	<u>\$230.00</u>	<u>\$4,408.50</u>	<u>\$742.50</u>		<u>\$5,381.00</u>
	0.4	7.1	1.1		8.6
[105] Asset Disposition		<u>\$4,830.50</u>	<u>\$0.00</u>		<u>\$4,830.50</u>
		6.7	0.8		7.5
[110] Business Operations	<u>\$30,320.50</u>	<u>\$18,200.50</u>	<u>\$2,607.50</u>	<u>\$6,384.00</u>	<u>\$57,512.50</u>
	43.1	26.7	3.8	10.0	83.6
[115] Case Administration	<u>\$7,130.50</u>	<u>\$38,736.50</u>	<u>\$31,203.00</u>	<u>\$7,864.50</u>	<u>\$84,934.50</u>
	11.1	57.5	44.8	10.3	123.7
[120] Claims Admin		<u>\$4,347.00</u>	<u>\$33,904.50</u>	<u>\$47,102.50</u>	<u>\$85,354.00</u>
		6.3	59.3	75.3	140.9
[130] Fee/Employment Applications	<u>\$5,280.50</u>	<u>\$8,022.50</u>	<u>\$2,258.50</u>	<u>\$14,112.00</u>	<u>\$29,673.50</u>
	10.7	17.0	4.3	30.4	62.4
[135] Fee/Employment Objections		<u>\$4,294.50</u>	<u>\$1,392.50</u>		<u>\$5,687.00</u>
		8.3	3.1		11.4
[140] Financing	<u>\$10,742.50</u>	<u>\$34,326.00</u>	<u>\$5,335.00</u>	<u>\$4,670.50</u>	<u>\$55,074.00</u>
	15.1	50.0	6.6	6.3	78.0
[160] Meeting of Creditors		<u>\$12,329.00</u>			<u>\$12,329.00</u>
		13.8			13.8
[170] Plan & Disclosure Statement	<u>\$1,822.50</u>	<u>\$6,912.00</u>	<u>\$53,844.00</u>	<u>\$34,943.50</u>	<u>\$97,522.00</u>
	2.7	10.0	81.6	50.5	144.8
[180] Relief from Stay Proceedings		<u>\$3,006.00</u>	<u>\$10,642.00</u>	<u>\$805.50</u>	<u>\$14,453.50</u>
		4.0	15.2	0.9	20.1
[Lit] Litigation -		<u>\$16,696.50</u>	<u>\$474.50</u>	<u>\$243.00</u>	<u>\$17,414.00</u>
		41.0	0.6	0.9	42.5
5890.002.01	<u>\$829.50</u>	<u>\$27,513.50</u>	<u>\$35,838.50</u>	<u>\$26,841.50</u>	<u>\$91,023.00</u>
Front Sight v. Las Vegas Development Fund (Removed Action) -	2.1	50.1	59.2	45.7	157.1
[180] Relief from Stay Proceedings				<u>\$2,212.00</u>	<u>\$2,212.00</u>
				5.6	5.6
5890.002.02			<u>\$6,480.00</u>	<u>\$8,409.00</u>	<u>\$14,889.00</u>
Objection to LVDF Claim			9.6	10.6	20.2
[120] Claims Admin			<u>\$6,480.00</u>	<u>\$8,409.00</u>	<u>\$14,889.00</u>
			9.6	10.6	20.2



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EXHIBIT 3 - MONTHLY FEE SUMMARY	May 2022	Jun 2022	Jul 2022	Aug 2022	Total
Matter	<u>Amount</u> <u>Hours</u>	<u>Amount</u> <u>Hours</u>	<u>Amount</u> <u>Hours</u>	<u>Amount</u> <u>Hours</u>	<u>Amount</u> <u>Hours</u>
5890.002.04				\$1,878.00	\$1,878.00
Meacher Claim Objection				4.4	4.4
Total	<u>\$56,356.00</u>	<u>\$183,623.00</u>	<u>\$184,722.50</u>	<u>\$153,254.00</u>	<u>\$577,955.50</u>
	85.2	298.5	290.0	245.3	919.0

EXHIBIT 4



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EXHIBIT 4 - MONTHLY COST SUMMARY	May 2022	Jun 2022	Jul 2022	Aug 2022	Total
<u>Component Description</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>
Attorney Service	\$306.20	\$260.00			\$566.20
Copies - Outside Vendor		\$203.30			\$203.30
Court Reporter or Deposition Charges	\$544.50	\$1,299.85	\$12.10		\$1,856.45
Fees	\$500.00	\$91.13			\$591.13
Filing Fees	\$1,738.00	\$350.00	\$250.00		\$2,338.00
Messenger or Delivery charges	\$23.80	\$10.61	\$10.83		\$45.24
Online Image Download Per Page			\$25.63		\$25.63
Online Research/Download Charges	\$75.00	\$1,759.67	\$3,324.78	\$1,600.58	\$6,760.03
Outside Professional Services				\$963.35	\$963.35
Photocopies - Inhouse	\$4.00				\$4.00
Postage			\$5.89		\$5.89
Prints - Inhouse	\$2.00	\$22.00	\$29.60	\$167.40	\$221.00
Total	<u>\$3,193.50</u>	<u>\$3,996.56</u>	<u>\$3,658.83</u>	<u>\$2,731.33</u>	<u>\$13,580.22</u>



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EXHIBIT 4 (CONTINUED) - DETAIL OF HARD COSTS EXCEEDING \$1,000				
<u>Date</u>	<u>Matter ID</u>	<u>Comp Desc</u>	<u>Trans Desc</u>	<u>Amount</u>
5/24/2022	5890.002	Fiing Fees	Client Cost Advanced to: Pay.gov - Bankruptcky filing fee	\$1,738.00

EXHIBIT 5



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EXHIBIT 5 - BIOGRAPHICAL INFORMATION

For the period from 5/24/2022 through 8/31/2022

Associate

Jessica S. Wellington (JSW)

Ms. Wellington works in the Firm's bankruptcy department. She obtained her Bachelor of Arts, cum laude, in Family and Consumer Sciences from California State University, Sacramento in 2010 and her Juris Doctor with Great Distinction, Business Concentration and Tax Concentration from The University of the Pacific, McGeorge School of Law in May 2018. She served as Law Clerk to the Honorable Victoria S. Kaufman at the United States Bankruptcy Court for the Central District of California. Ms. Wellington was admitted to the State Bar of California in December 2018.

Ryan F. Coy (RFC)

Mr. Coy works in the Firm's bankruptcy department. He obtained his Bachelor of Science in Law & Economics and Political Science from Central Michigan University in 2015 and his Juris Doctor from Michigan State University College of Law in May 2018. He served as Law Clerk to the Honorable Scott H. Yun at the United States Bankruptcy Court for the Central District of California as well as for the Honorable Deborah J. Saltzman of the United States Bankruptcy Court for the Central District of California. Mr. Coy was admitted to the State Bar of California in January 2019.

Equity Partner

Steven T. Gubner (STG)

Mr. Gubner is BG Law's Managing Partner, and represents financial institutions, Fortune 500 companies (and their financing divisions), closely held businesses and high net worth individuals in complex bankruptcy and insolvency matters. He is known in the insolvency arena as the "involuntary bankruptcy go-to lawyer" because of his management of the sensitive issues surrounding involuntary bankruptcy filings, and general business advice he applies to navigate potential pitfalls and solve problems before they occur. In addition, he is adept in complex bankruptcy insolvency matters. M. Gubner is particularly skilled in commercial collections for banks and financial institutions, and has successfully litigated heavily contested, multimillion-dollar real/personal property and equity line financing cramdown cases. He also assists in pre-bankruptcy, pre-workout and wealth management advice and planning. In addition, he has handled numerous cases before the Bankruptcy Appellate Panel and U.S. Ninth Circuit Court of Appeal and the United States Supreme Court. Mr. Gubner received a B.A. from the University of California, Santa Barbara (1988), and his law degree from McGeorge School of Law (1991). Mr. Gubner was admitted to the State Bar of California in December 1991. Mr. Gubner is also admitted to the State Bar of Nevada, as well as the United States District Court, the U.S. Ninth Circuit Court of Appeals, and the United States Supreme Court.



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EXHIBIT 5 - BIOGRAPHICAL INFORMATION

For the period from 5/24/2022 through 8/31/2022

Partner

Jason B. Komorsky (JBK)

Jason Komorsky represents trustees and creditors in complex bankruptcy and insolvency litigation, including in the context of legal malpractice, breach of fiduciary duty and fraud claims. Previously, Mr. Komorsky was a partner at Morgan, Lewis & Bockius LLP where he represented Fortune 500 companies and other businesses in commercial litigation with an emphasis on insurance recovery in both federal and state courts. His sought out insurance experience includes matters relating to general liability, workers' compensation, D&O and E&O, first-party property, and business interruption. He has settled and/or litigated matters to judgment involving product liability coverage, asbestos/silica bodily injury, toxic torts, environmental property damage and corporate malfeasance. He specializes in the energy, chemical, manufacturing, retail, banking, and financial services industries. He also represents asbestos settlement trusts created pursuant to 11 U.S.C. §524(g), and counsels clients on insurance procurement, commercial and captive insurance programs, claims notifications and other insurance-related matters. He is well known for his work with historic comprehensive general liability, umbrella and excess, Bermuda Form and occurrence-based policies. In addition to his broad insurance litigation background, Mr. Komorsky's practice also focuses on insolvency claims, including several massive recoveries on behalf of clients in the Home Insurance Company liquidation. Mr. Komorsky received a Bachelor of Arts degree from the University of California, Berkeley in 1986, and his Juris Doctor from the University of California, Hastings College of the Law in 1991. Mr. Komorsky was admitted to the State Bar of California in December 1991.

Jerrold L. Bregman (JBX)

Mr. Bregman is a financial restructuring lawyer and business advisor with substantial experience representing public and private companies in out-of-court restructurings, "prepackaged" bankruptcies and traditional Chapter 11 cases. He also has represented lenders, vendors, secured and unsecured creditors, landlords, fiduciaries, indenture trustees, GOB liquidators, HNWI's, hedge fund managers, private equity sponsors, government agencies, asset purchasers, and plaintiffs and defendants in bankruptcy litigation. Mr. Bregman graduated from the UC Berkeley with a B.A. in Political Economy of Industrial Societies in 1986 (Phi Beta Kappa, Valedictorian), and he received his law degree from UCLA School of Law, and an M.B.A. from UCLA's Anderson Graduate School of Management, both in 1990, and he was admitted to the State Bar of California in 1990 and the State Bar of New York in 2003. Mr. Bregman also is a Specialist in Bankruptcy Law (California Board of Legal Specialization, 1995), a Martindale-Hubbell AV Preeminent-rated lawyer, and he has been named a New York Super Lawyer by Thomson Reuters.

Jessica L. Bagdanov (JLB)

Ms. Bagdanov works in the firm's bankruptcy department. She obtained her Bachelor of Arts in Philosophy from Westmont College in Santa Barbara, California in 2007 and her Juris Doctor from Chapman University School of Law in Orange, California in 2011. She served as Law Clerk to the Honorable Robert N. Kwan and the Honorable Ellen Carroll (retired) at the United States Bankruptcy Court for the Central District of California. Ms. Bagdanov also served as a Staff Attorney for the Bankruptcy Appellate Panel of the United States Court of Appeals for the Ninth Circuit. Ms. Bagdanov was admitted to the State Bar of California in December, 2011.

Susan K. Seflin (SKS)

Susan K. Seflin is a Partner of BG Law. Ms. Seflin's practice involves all aspects of bankruptcy and creditor-debtor rights, with particular emphasis on Chapter 11 reorganizations and related litigation. Ms. Seflin received her B.A. in Economics from University of California Berkeley, an MBA from Pepperdine School of Business and Management and her Juris Doctor from Pepperdine University School of Law in Malibu, California (2000). During graduate school, Ms. Seflin externed for the Hon. Arthur M. Greenwald, U.S. Bankruptcy Judge for the Central District of California. Ms. Seflin was admitted to the California State Bar in June 2001.



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EXHIBIT 5 - BIOGRAPHICAL INFORMATION

For the period from 5/24/2022 through 8/31/2022

Paralegal

Juanita Treshinsky (JT)

Ms. Treshinsky has extensive background in bankruptcy on behalf of chapter 7 and 11 trustees, corporate debtors and creditors. Ms. Treshinsky received a Bachelor of Arts degree from California Lutheran University and a Paralegal Certificate from University of California, Los Angeles Extension.

Yves Derac (YD)

Mr. Dérac has extensive background in business reorganization, creditors' rights and bankruptcy on behalf of debtors, trustees and creditors in a myriad of industries including manufacturing, marketing and promotion, retail, entertainment, finance, golf courses, real estate development, hospitality, insurance, real estate, shipping, and healthcare. Mr. Dérac received his Bachelor of Science Degree from John Jay College of Criminal Justice (CUNY), New York, New York, and his Paralegal Specialist Certificate in Litigation and Corporate Transactions from Adelphi University, Long Island, New York. Mr. Dérac also completed the first year curriculum in law school at Texas Southern University.

EXHIBIT 6

NVB 2016 (05/2022)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

Fee Application Cover Sheet

Case No.: 22-11824 Chapter: 11 Hearing Date/Time: 10/24/2022 09:30

Debtor: Front Sight Management, LLC

Applicant: BG Law LLP

Date of Employment: May 24, 2022

Interim Fee Application No: 1 OR Final Fee Application _____

Amounts Requested:

Client Approval: Yes No

Fees: \$ 577,955.50

Expenses: \$ 13,580.22

Total: \$ 591,535.72

Hours: 919.00

Blended Rate: \$ 628.90

Fees Previously Requested: \$ 0.00

Awarded: \$ _____

Expenses Previously Requested: \$ 0.00

Awarded: \$ _____

Total Previously Requested: \$ 0.00

Awarded: \$ _____

Total Amount Paid: \$ 357,847.69

Chapter 13 Cases ONLY:

Yes No Elected to accept the Chapter 13 Presumptive Fee pursuant to LR 2016.2, and filed the "Notice of Election to Accept the Presumptive Fee" on _____.

Yes No Participated in the Mortgage Mediation Program: **If yes**, amount received: \$ _____

I certify under penalty of perjury that the above is true.

/s/ Jessica S. Wellington

Date 9/26/2022

Signature

BG Law LLP received \$357,847.69 on September 1, 2022 pursuant to the procedures in the Interim Compensation Order [ECF No. 318].

CERTIFICATE OF SERVICE

I declare that I am over the age of 18 years and not a party to the within action. I am employed in the County of Los Angeles and my business address is 21650 Oxnard Street, Suite 500, Woodland Hills, California 91367.

On September 26, 2022, I served the following document:

AMENDED FIRST INTERIM APPLICATION OF BG LAW LLP, AS BANKRUPTCY COUNSEL FOR THE DEBTOR, FOR THE ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES

BY ELECTRONIC MAIL

Those designated "[NEF]" on the Court docket were served with the Notice by the Court via Electronic Mail, as follows:

- JASON BLUMBERG Jason.blumberg@usdoj.gov
- CHAPTER 11 - LV USTPRegion17.lv.ecf@usdoj.gov
- DAWN M. CICA dcica@carlyoncica.com, nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com
- WILLIAM C DEVINE william@devine.legal, courtney@devine.legal;devinewr72773@notify.bestcase.com
- THOMAS H. FELL tfell@fennemorelaw.com, clandis@fennemorelaw.com;CourtFilings@fennemorelaw.com
- PHILIP S. GERSON Philip@gersonnvlaw.com
- STEVEN T GUBNER sgubner@bg.law, ecf@bg.law
- RAMIR M. HERNANDEZ rhernandez@wrightlegal.net, jcraig@wrightlegal.net;nvbkfilings@wrightlegal.net
- JASON B KOMORSKY jkomorsky@bg.law
- BART K. LARSEN BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com
- NICOLE E. LOVELOCK nlovelock@joneslovelock.com, ljanuskevicius@joneslovelock.com
- EDWARD M. MCDONALD edward.m.mcdonald@usdoj.gov
- TRACY M. O'STEEN tosteen@carlyoncica.com, crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com
- TERESA M. PILATOWICZ tpilatowicz@gtg.legal, bknotices@gtg.legal
- SAMUEL A. SCHWARTZ saschwartz@nvfirm.com, ecf@nvfirm.com;schwartzsr45599@notify.bestcase.com;eanderson@nvfirm.com;samid@nvfirm.com
- SUSAN K. SEFLIN sseflin@bg.law
- BRIAN D. SHAPIRO brian@brianshapirolaw.com, kshapiro@brianshapirolaw.com;6855036420@filings.docketbird.com
- STRETTO ecf@cases-cr.stretto-services.com, aw01@ecfcbis.com,pacerpleadings@stretto.com
- U.S. TRUSTEE - LV - 11 USTPRegion17.lv.ecf@usdoj.gov
- JESSICA S. WELLINGTON jwellington@bg.law

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed September 26, 2022, at Woodland Hills, California.

/s/ Abbie Au
ABBIE AU