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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: January 9, 2023
Hearing Time: 9:30 a.m.

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20 **SECOND AND FINAL FEE APPLICATION OF BG LAW LLP, AS BANKRUPTCY**
21 **COUNSEL FOR THE DEBTOR, FOR THE ALLOWANCE OF COMPENSATION FOR**
22 **PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES**
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SUMMARY COVER SHEET

1	Fee Application:	Second and Final Application
2	Applicant:	BG Law LLP
3	Capacity:	Bankruptcy Counsel to Chapter 11 Debtor
	Debtor:	Front Sight Management LLC
4	Interim Compensation Period:	September 1, 2022 – December 9, 2022 ¹
	Case Compensation Period:	May 24, 2022 -December 9, 2022
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6	Petition Date:	May 24, 2022
7	Retention Date:	April 12, 2022
	Date of Order Approving Employment:	June 30, 2022 [ECF No. 224]
8	Previous Fees Requested and Rewarded:	\$577,955.50 ²
	Previous Costs Requested and Rewarded:	\$13,580.22
9	Total Fees and Costs Previously Awarded:	\$591,535.72
10	Total Interim Fees and Costs Previously Paid:	\$591,535.72
11	Interim Compensation Period Fees Requested:	\$569,489.50 ³
	Interim Compensation Period Costs Requested:	\$11,245.03
12	Total Fees and Costs Requested:	\$580,734.53
	Number of Hours:	922.9
13	Blended Rate:	\$617.06
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15	Fees and Costs Paid Per Interim Comp. Order:	\$273,149.73 for services rendered from September 1, 2022 through October 31, 2022
16		
17	Summary of Fees By Professionals:	See Exhibits 1-2 hereto
	Summary of Fees By Task Codes:	See Exhibits 1-3 hereto
18	Summary of Expenses By Type:	See Exhibit 4 hereto
19	Number of Professionals Included:	7
	Number of Professionals Billing Less Than 15 Hrs:	0
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21	Number of Hours during Case Compensation Period:	1,841.9
22	Blended Rate during Case Compensation Period:	\$622.97
23	Total Final Fees and Costs Sought:	\$1,172,270.25 (plus amount per fn 1)
	Total Additional Payment Sought:	\$307,584.80 (plus amount per fn 1)
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¹ BG will submit a supplement that includes time incurred from December 9, 2022 through and including the hearing on the Application (including an estimate for time incurred in connection with the hearing on the Application).

² BG's fees of \$577,955.50 reflected a voluntary write-off in the amount of \$10,158.00.

³ BG's fees of \$569,489.50 reflect a voluntary write-off in the amount of \$6,500.00.

1 BG Law LLP (“BG”), bankruptcy counsel to Front Sight Management LLC (the “Debtor”) in
2 its chapter 11 bankruptcy case, hereby respectfully submits its second and final application (the
3 “Application”) pursuant to Sections⁴ 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016,
4 and Local Rule 2016, for the allowance of compensation for professional services provided by BG to
5 the Debtor during the pendency of its chapter 11 case, and for reimbursement of its actual and
6 necessary expenses incurred therein.

7 By the Application, BG requests (1) allowance on a final basis of its fees and expenses in the
8 amount of \$580,734.53 incurred during the period of September 1, 2022 through and including
9 December 9, 2022⁵ (the “Interim Compensation Period”), of which \$307,584.80 remains unpaid, (2)
10 an order making final the interim compensation order awarded to BG in this case [ECF No. 469] (the
11 “BG Interim Order”) in the amount of \$591,535.72 for the period May 24, 2022 through August 31,
12 2022, (3) an order allowing on a final basis all of BG’s fees and expenses incurred from May 24,
13 2022 through and including December 9, 2022 (including any supplemental time submitted that was
14 incurred from December 9, 2022 through January 9, 2023) (the “Case Compensation Period”) in an
15 amount of at least \$1,172,270.25, (4) authorizing BG to pay itself \$307,584.80⁶ from the funds held
16 in its settlement trust account pursuant to the confirmation order entered in this case and, if
17 applicable, (5) instructing the reorganized debtor (“Reorganized Debtor”) to pay BG any deficiency.

18 This Application is based upon the following Memorandum of Points and Authorities, the
19 declarations of Steven T. Gubner (the “Gubner Declaration”) and Ignatius Piazza (the “Piazza
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22 ⁴ All references to “Section” herein shall be to the Bankruptcy Code appearing in Title 11 of the U.S.
23 Code; all references to a “Bankruptcy Rule” shall refer to the Federal Rules of Bankruptcy
24 Procedure; and all references to a “Local Rule” shall refer to the Local Rules of Bankruptcy Practice
25 of the U.S. District Court for the District of Nevada.

26 ⁵ BG will submit a supplement that includes time incurred from December 9, 2022 through and
27 including the hearing on the Application (including an estimate for time incurred in connection with
28 the hearing on the Application).

⁶ In addition to this amount, BG seeks Court authority by its Application to be paid for the fees and
costs incurred in connection with preparing the Application that are not included in this Application
and appearing at the hearing on the Application, as well as fees and costs incurred from December
10, 2022 until the January 9, 2023 hearing (the “Hearing”) on the Application. Prior to the Hearing,
BG will file a supplement to its Application which will contain the detailed time entries for this
additional time period.

1 Declaration”), and the papers and pleadings filed in this chapter 11 case, judicial notice of which is
2 respectfully requested pursuant to Rule 201 of the Federal Rules of Evidence.

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

4 **I. INTRODUCTION**

5 1. The Debtor commenced this bankruptcy case on May 24, 2022 (the “Petition Date”).
6 Until entry of the Confirmation Order, defined below, the Debtor operated its business and managed
7 its financial affairs as a debtor in possession pursuant to Section 1107 and 1108.

8 2. The Debtor’s case was filed on an emergency basis because, among other things, its
9 prepetition lender, Las Vegas Development Fund LLC (“LVDF”), filed a notice of foreclosure
10 against the Debtor’s real property.

11 3. Throughout this bankruptcy case, BG has assisted the Debtor in reaching resolutions
12 to a number of issues including, among other things: (a) obtaining DIP financing over the vigorous
13 objections of several creditors and the United States Trustee; (b) employing several professionals to
14 assist the Debtor as it continued to operate its business; (c) preparing several emergency first day
15 motions so that the Debtor could continue to operate its business; (d) formulating, negotiating, and
16 preparing a chapter 11 plan and disclosure statement (and multiple amendments thereto); (e)
17 analyzing claims filed against the Debtor and preparing objections thereto; (f) assisting the Debtor in
18 its ongoing litigation with LVDF; (g) initiating an avoidance action and claim objection against
19 Michael Meacher (“Meacher”); (h) communicating with members of the Debtor regarding their
20 memberships, claims, and the Debtor’s chapter 11 plan of reorganization; (i) obtaining a stipulation
21 with LVDF and the Official Committee of Unsecured Creditors, which stipulations enabled the
22 Debtor to confirm a chapter 11 plan of reorganization; and (j) exploring various exit strategies from
23 this case including an new equity investment, which enabled the Debtor to propose a feasible plan.

24 4. BG’s efforts in this case ultimately culminated in the confirmation of the *Debtor’s*
25 *Second Amended Chapter 11 Plan of Reorganization* [ECF No. 405] (the “Plan”).

26 5. The professional services performed by BG during the Interim Compensation Period
27 were necessary and appropriate to the administration of this chapter 11 case and were in the best
28 interests of the Debtor and its estate. Compensation for the below described services is

1 commensurate with the complexity, importance, and nature of the problems, issues, and tasks
2 involved in this chapter 11 case.

3 6. BG respectfully submits that the services for which it seeks compensation and the
4 expenditures for which it seeks reimbursement in this Application were necessary for and beneficial
5 to the Debtor's orderly administration of its estate and its rehabilitation and reorganization efforts.
6 BG further submits that the compensation requested herein is reasonable in light of the nature,
7 extent, and value of such services to the Debtor, its estate, and all parties-in-interest, and thus
8 approval of the Application is warranted.

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

10 7. Name of Applicant: BG Law LLP.

11 8. Type of Services Rendered: General bankruptcy counsel to the Debtor.

12 9. Interim Compensation Period: September 1, 2022 through December 9, 2022.

13 10. Case Compensation Period: May 24, 2022 through December 9, 2022 (plus time
14 period covered by Footnote 6).

15 11. Date of Filing of Petition: May 24, 2022.

16 12. Date of Entry of Order Approving BG's Employment: June 30, 2022 [ECF No. 224],
17 effective as of May 24, 2022.

18 13. Date of Filing of Last Fee and Expense Application: September 23, 2022.

19 14. Total Amount of Fees and Costs Previously Requested and Approved by the Court to
20 Date Pursuant to Prior Approved Fee Applications: \$591,535.72 [ECF No. 469].

21 a) Retainer received prior to the Petition Date: \$150,077.50.

22 b) Retainer remaining (unapplied) as of the date of this Application: None.

23 c) Total amount requested in all prior applications: \$591,535.72.

24 d) Total amount actually paid pursuant to prior approved applications: \$591,535.72.

25 e) Total amount currently due but unpaid pursuant to prior approved applications:
26 None.

27 f) Total amount allowed but reserved pending final application: None.
28

1 15. Total fees and costs paid pursuant to the Interim Compensation Order [ECF No. 318]
2 during the Interim Compensation Period: \$273,149.73.

3 16. Summary of Requested Fees for the Interim Compensation Period: **Exhibit 1** is the
4 Billing Statements for the Interim Compensation Period. **Exhibit 2** is the Monthly Summary of Fees
5 sorted by Activity Code. **Exhibit 3** is the Timekeeper Summary of Fees sorted by Activity Code.

6 17. The hourly rates cited herein are the same rates charged by BG professionals for non-
7 bankruptcy services.

8 18. TOTAL FEES REQUESTED FOR THE INTERIM COMPENSATION PERIOD IN
9 THIS APPLICATION: **\$569,489.50.**⁷

10 19. Total Hours Expended by BG during the Interim Compensation Period: 922.9.

11 20. Blended Hourly Rate during the Interim Compensation Period: \$617.06.

12 21. Summary of Requested Expense Reimbursement for the Interim Compensation
13 Period: *See Exhibit 4* attached hereto and incorporated herein by this reference.

14 22. TOTAL EXPENSE REIMBURSEMENT REQUESTED IN THIS APPLICATION
15 FOR THE INTERIM COMPENSATION PERIOD: **\$11,245.03.**

16 23. Narrative Statement of Services Rendered and Expenses Incurred: *See infra.*

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

19 **III. JURISDICTION AND VENUE**

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

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

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

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

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28 ⁷ BG's fees of \$569,489.50 reflect a voluntary write-off in the amount of \$6,500.00.

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

4 **IV. SUMMARY OF COMPENSATION FOR PROFESSIONAL SERVICES AND**
5 **ESTATE FUNDS**

6 30. BG requests allowance and final approval of fees and expenses for services as general
7 bankruptcy counsel to the Debtor incurred during the pendency of this chapter 11 case for the period
8 May 24, 2022 through and including December 9, 2022, in the following amounts: (1) fees for the
9 Interim Compensation in the amount of \$569,489.50, which amount reflects a voluntary write-off in
10 the amount of \$6,500.00; (2) expenses for the Interim Compensation Period in the amount of
11 \$11,245.03, for total fees and expenses of \$580,734.53 for the Interim Compensation Period; and (3)
12 final approval of BG's fees and reimbursement of expenses in the amount of \$591,535.72 awarded
13 to BG on an interim basis pursuant to the Order re First Interim Application. Pursuant to the Plan
14 and Confirmation Order (defined below), BG is to be paid in full from first from Plan proceeds upon
15 entry of the order approving this Application with any deficiency to be paid by the Reorganized
16 Debtor. As of December 9, 2022, BG is holding \$20,400,000 of Plan proceeds in its client trust
17 account of which \$1,544,298.99 may be used to pay administrative expenses in this case.

18 31. BG entered into no agreement and made no understanding, formal or otherwise, with
19 any person or entity concerning the sharing of compensation to be received, except as among the
20 principals of BG.

21 32. To date, the following administrative expenses have accrued, in addition to those of
22 BG:

- 23 • Province, LLC (the Debtor's financial advisor): \$1,260,326.63 of which \$945,168.96 has
24 been paid.
- 25 • Kelley Drye & Warren LLP (Committee counsel): \$939,060.07 of which \$485,215.37
26 has been paid.
- 27 • Carlyon Cica CHTD. (Committee Nevada counsel): \$156,738.67 of which \$261,109.82
28 has been paid.

- 1 • Dundon Advisors LLC (Committee financial advisor) \$268,436.00 of which \$253,010.00
- 2 has been paid.
- 3 • Greenberg Traurig, LLP \$24,925.50 of which \$24,925.50 has been paid [ECF No. 552].
- 4 • Lucas Horsfall \$49,348.50 of which \$30,000.00 has been paid.

5 **V. BRIEF NARRATIVE HISTORY OF DEBTOR'S BANKRUPTCY CASE**

6 **A. Background Information**

7 33. On the Petition Date, the Debtor filed a voluntary petition for relief under chapter 11
8 of the Bankruptcy Code. On June 9, 2022, the Official Committee of Unsecured Creditors (the
9 “Committee”) was appointed by the United States Trustee (“US Trustee”) pursuant to section 1102
10 of the Bankruptcy Code.

11 34. A detailed explanation of the Debtor’s business operations, circumstances leading to
12 the Debtor’s chapter 11 filing, and the significant events during the Debtor’s chapter 11 case from
13 the Petition Date through August 31, 2022 is set forth in BG’s *Amended First Interim Application of*
14 *BG Law LLP, as Bankruptcy Counsel for the Debtor, for the Allowance of Compensation for*
15 *Professional Services Rendered and Reimbursement of Expenses* [ECF No. 383] (the “BG First
16 Interim Application”).

17 **B. Significant Events During the Interim Compensation Period**

18 35. BG incorporates the information and documents included in the BG First Interim
19 Application as though fully set forth herein. Therefore, BG has only included significant events
20 incurred from September 1, 2022 through and including December 9, 2022. The following is a list
21 of significant events which have occurred during the Interim Compensation Period.

22 **1. The Debtor’s Employment of Professionals.**

23 36. On August 29, 2022, Debtor filed an application to employ Greenberg Traurig, LLP
24 [ECF No. 329]. On September 16, 2022, the US Trustee filed an objection to the employment
25 application [ECF No. 349]. On September 23, 2022, the Debtor filed its reply [ECF No. 360] to the
26 US Trustee’s objection. On October 19, 2022, the Court entered an order approving the Debtor’s
27 application to employ Greenberg Traurig, LLP [ECF No. 425].
28

1 **2. Interim Applications for Compensation and Reimbursement of Expenses.**

2 37. On September 23, 2022, the Debtor’s financial advisor, Province, LLC, filed its first
3 interim application for compensation and reimbursement of expenses [ECF No. 358] and on
4 September 26, 2022, Province, LLC filed an amended first interim application [ECF No. 382], which
5 application was approved by the Court on October 31, 2022 [ECF No. 468].

6 38. On September 23, 2022, BG filed its first interim application for compensation and
7 reimbursement of expenses [ECF No. 369] and on September 26, 2022, BG filed an amended first
8 interim application [ECF No. 383], which application was approved by the Court on October 31,
9 2022 [ECF No. 469].

10 39. On September 23, 2022, the Committee’s counsel and financial advisors filed their
11 first interim applications for compensation and reimbursement of expenses [ECF Nos. 362, 364, and
12 366], which applications were approved by the Court on October 25, 2022 [ECF Nos. 452, 453, and
13 454].

14 40. On October 20, 2022, Greenberg Traurig, LLP filed its first and final application for
15 compensation and reimbursement of expenses [ECF No. 434], which application was approved by
16 the Court on November 28, 2022 [ECF No. 552].

17 **3. Motion to Appoint Examiner.**

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

22 **4. Motion to Terminate Stay**

23 42. On June 27, 2022, LVDF filed a motion to terminate the automatic stay to continue
24 prosecution of its counterclaims in the underlying state court litigation between the Debtor and
25 LVDF (the “LVDF Litigation”), including fraudulent transfer claims [ECF No. 206] (the “RFS
26 Motion”). On July 11, 2022, the Debtor filed an opposition to the RFS Motion [ECF No. 253], as
27 did the Committee [ECF No. 254]. At the oral ruling on the RFS Motion held on September 9,
28 2022, the Court found that LVDF’s counterclaims in the LVDF Litigation are property of the

1 bankruptcy estate. On September 15, 2022, the Court entered an order denying the RFS Motion
2 [ECF No. 346].

3 **5. Plan and Disclosure Statement**

4 43. Under the Final DIP Order, the Debtor was required to file a chapter 11 plan by July
5 15, 2022, and the Debtor filed an initial plan and disclosure statement on July 15, 2022 [ECF Nos.
6 270 and 271]. On September 9, 2022, the Debtor filed its *First Amended Chapter 11 Plan of*
7 *Reorganization Dated September 9, 2022* [ECF No. 337] and related disclosure statement [ECF No.
8 338].

9 44. On September 16, 2022, LVDF filed a notice of intent to issue subpoenas to the
10 Debtor's principal, the Debtor's DIP Lender FS DIP, LLC, and Nevada PF, LLC (the "New Equity
11 Investor") in connection with the Debtor's disclosure statement and chapter 11 plan of
12 reorganization [ECF Nos. 352 and 353].

13 45. On September 23, 2022, the US Trustee, the Committee, LVDF, and Meacher filed
14 objections to the Debtor's first amended disclosure statement [ECF Nos. 356, 361, 373, and 374,
15 respectively]. On September 27, 2022, the Debtor filed an omnibus reply to the objections to the
16 Debtor's disclosure statement [ECF No. 387]. The hearing on the Debtor's first amended disclosure
17 statement was September 30, 2022.

18 46. On October 3, 2022, the Debtor filed its *Second Amended Disclosure Statement*
19 *Describing Debtor's Second Amended Chapter 11 Plan of Reorganization* [ECF No. 406] (the
20 "Disclosure Statement") and the Plan. On the same day, the Court entered an order approving the
21 Disclosure Statement [ECF No. 403].

22 47. On October 19, 2022, LVDF filed a motion to estimate its claim for purposes of
23 voting on the Plan [ECF No. 429]. The Debtor, through its counsel BG, negotiated a consensual
24 resolution of this motion and of LVDF's treatment under the Plan [ECF No. 474].

25 48. On October 21, 2022, the Debtor filed its motion for confirmation of the Plan [ECF
26 No. 439]. On the same day, the Debtor filed its first supplement to the Plan [ECF No. 445]. On
27 October 28, 2022, the Debtor filed its second supplement to the Plan [ECF No. 466]. On November
28 28, 2022, the Debtor filed its third supplement to the Plan [ECF No. 553].

1 49. On October 31, 2022, the Committee filed a notice of deposition of the Debtor's
2 principal in connection with confirmation of the Plan [ECF No. 470].

3 50. On November 4, 2022, the US Trustee and Meacher filed objections to the Plan [ECF
4 Nos. 475 and 484, respectively]. On November 7, 2022, the Committee filed an objection to the
5 Plan [ECF No. 495]. On November 11, 2022, the Debtor filed its omnibus reply to the objections to
6 the Plan [ECF No. 519].

7 51. Thereafter, the Debtor, through its counsel BG, negotiated a consensual resolution of
8 the Committee's objection to the Plan and the notice of deposition of the Debtor's principal [ECF
9 No. 536].

10 52. On November 18, 2022, the Court held a hearing on the confirmation of the Plan. On
11 November 29, 2022, the Court entered an order confirming the Plan [ECF No. 556] (the
12 "Confirmation Order"). The effective date of the Plan was December 2, 2022 [ECF No. 584].

13 6. Legal Proceedings

14 53. **The LVDF Litigation and Subsequent Removal.** As of the Petition Date, the
15 Debtor contended that LVDF's counterclaims in the LVDF Litigation were property of the estate as
16 they are premised on either: (i) the Debtor's principal being the alter ego of the Debtor; or (ii)
17 allegations that the Debtor made fraudulent transfers to certain non-debtor affiliated entities.

18 54. On May 12, 2022, LVDF filed a motion for terminating sanctions (the "Terminating
19 Sanctions Motion") in the LVDF Litigation, which was set for hearing on May 25, 2022, i.e., after
20 the Petition Date. The Terminating Sanctions Motion was based on the Debtor's and the Non-
21 Debtor Entities' failure to appear for their depositions. Through the Terminating Sanctions Motion,
22 LVDF requested that the state court strike the Debtor's operative complaint and enter judgment in
23 favor of LVDF on the Debtor's claims, and strike the answers and affirmative defenses to LVDF's
24 counterclaims filed by the non-debtor affiliates, including on the fraudulent transfer claims.

25 55. Notwithstanding the Debtor's bankruptcy filing, postpetition on June 22, 2022, the
26 state court entered its *Order Granting in Part Defendants and Counterclaimant's Motion for Case*
27 *Dispositive Sanctions* (the "Terminating Sanctions Order") against the non-debtor entities. The
28 Debtor asserted that each of LVDF's counterclaims was property of the estate, and upon the filing of

1 the Debtor's bankruptcy petition, LVDF was divested of standing to prosecute such claims and
2 continued prosecution by LVDF was a violation of the automatic stay.

3 56. Accordingly, on June 23, 2022, the Debtor removed the LVDF Litigation to the
4 Bankruptcy Court, commencing adversary proceeding no. 22-01116-abl (the "Removed Action").

5 57. On June 27, 2022, LVDF filed a motion to remand the LVDF Litigation to the state
6 court [Adv. ECF No. 4] (the "Remand Motion") On July 11, 2022, the Debtor filed an opposition to
7 the Remand Motion [Adv. ECF No. 57], and the Committee filed an opposition as well [Adv. ECF
8 No. 63]. On September 15, 2022, the Court entered an order denying the Remand Motion [Adv.
9 ECF No. 107].

10 58. On July 5, 2022, the Debtor filed its motion for confirmation that LVDF violated the
11 automatic stay by obtaining entry of a terminating sanctions order postpetition in the LVDF
12 Litigation or, in the alternative, for relief from the terminating sanctions order pursuant to Rule 60(b)
13 of the Federal Rules of Civil Procedure [Adv. ECF Nos. 43 and amended motion Adv. ECF No. 51]
14 (the "Stay Violation Motion"). The hearing on the Stay Violation Motion was held on September 1,
15 2022. Given the Court's oral ruling on the RFS Motion that LVDF's counterclaims are property of
16 the bankruptcy estate, the Debtor and LVDF entered into a stipulation resolving the Stay Violation
17 Motion, which stipulation was approved by the Court [Adv. ECF No. 106]. Pursuant to the
18 stipulation [Adv. ECF No. 104], the Terminating Sanctions Order and any other oral ruling made by
19 the state court judge in connection thereto are void ab initio.

20 59. **Motion to Quash.** On July 7, 2022, the Debtor filed motions for authority to conduct
21 Bankruptcy Rule 2004 examinations [ECF Nos. 245 and 246] (the "2004 Motions") of LVDF and its
22 principal. In response, LVDF filed a motion to quash the subpoenas issued pursuant to the 2004
23 Motions [ECF No. 309]. The Debtor, with the assistance of BG, negotiated with LVDF to come to a
24 consensual resolution of the motion to quash and the motion was taken off calendar [ECF No. 391].

25 60. **Objections to Claims.** As of the date this Application, 966 proofs of claim have
26 been filed. The Debtor and its professionals are in the process of reviewing the claims and
27 determining which claims are objectionable.
28

1 61. The Debtor has prepared and filed seven omnibus objections to the claims and three
2 objections to certain claims filed by members of the Debtor, which asserted the claims were secured
3 by the Debtor's property [ECF Nos. 411, 426, 442, 480, 558, 660, 563, 566, 568, and 570].
4 Subsequently, several claimants contacted BG regarding the Debtor's objections to certain claims,
5 and BG worked with those claimants to come to a consensual resolution of the Debtor's objections
6 to their claims. *See* ECF Nos. 464, 465, 471, 472, 579].

7 62. One claimant James Harriss filed a response to the Debtor's first omnibus objection
8 [ECF No. 491]. On November 10, 2022, the Debtor filed a reply to Mr. Harriss's response [ECF No.
9 541].

10 63. The hearing on the Debtor's first omnibus objection was held on November 18, 2022.
11 At the hearing, the Court sustained the Debtor's objection with respect to all objections to the claims
12 listed therein except for Mr. Harriss's claim [ECF No. 575]. An oral ruling with respect to the
13 Debtor's objection to Mr. Harriss's claim is set for December 19, 2022. *Id.*

14 64. On November 18, 2022, the Court held a hearing on the Debtor's second omnibus
15 objection to claims at which the Court sustained the Debtor's omnibus objection [ECF No. 577].

16 65. The hearings on the remainder of the Debtor's omnibus objections and the three
17 objections to the secured claims are set for January 9, 2023.

18 66. The Debtor also filed an objection to LVDF's claim [ECF No. 393].

19 67. The Debtor also filed a complaint against Meacher and his wife, Dianne Meacher,
20 objecting to Meacher's claim and for avoidance and recovery of fraudulent transfers, commencing
21 adversary proceeding 22-01152-abl.

22 **VI. STATEMENT OF SERVICES RENDERED AND TIME EXPENDED DURING THE**
23 **INTERIM COMPENSATION PERIOD**

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

25 68. This category includes the identification and review of potential assets including
26 causes of action and non-litigation recoveries. Time spent in this category relates to correspondence
27 with the Debtor regarding reimbursement to the Debtor's estate for pre-petition checks paid and to
28

1 drafting correspondence to Higbee & Associates regarding continuation of collection efforts on a
2 pre-petition claim.

3 69. BG spent a total of **8.9** hours and **\$5,839.50** in fees during the Interim Compensation
4 Period in the Asset Analysis category. BG spent approximately 0.96% of its time in this category.

5 **B. Business Operations (Task Code 110).**

6 70. This category includes issues related to the Debtor operating in chapter 11. During
7 the Interim Compensation Period, BG worked closely with the Debtor's principals and professionals
8 in connection with overseeing business operations and various other operational and procedural
9 issues.

10 71. BG devoted time to conferring with the Debtor and its professionals and the New
11 Equity Investor and its professionals in connection with the various issues related to the transition of
12 the Debtor's business to the New Equity Investor.

13 72. BG spent a total of **15** hours and **\$10,125.00** in fees during the Interim Compensation
14 Period in the Business Operations category. BG spent approximately 1.62% of its time in this
15 category.

16 **C. General Case Administration (Task Code 115).**

17 73. This category includes general case administration and the activities described below.
18 During the Interim Compensation Period, BG dealt with administrative issues concerning the estate
19 and preparation of documents ordinary and usual in a chapter 11 case. Services in this category also
20 relate to assisting the Debtor in preparing and filing its monthly operating reports as well as
21 communicating with counsel for the US Trustee regarding compliance issues and status of the
22 Debtor's case.

23 74. During the Interim Compensation Period, BG conferred with the Debtor's principal
24 and third parties regarding administrative matters, including various tax compliance issues, the
25 Debtor's insurance policies, and transitioning the Debtor's bank accounts under the Plan. BG also
26 spent time in the category reviewing correspondence from the Debtor's members and drafting
27 correspondence to the Debtor's members regarding the Debtor's chapter 11 case.
28

1 75. BG spent time in this category corresponding with the Debtor and its professionals
2 regarding document requests from the Committee and LVDF.

3 76. BG spent time in the category attending the oral ruling on the Examiner Motion.

4 77. BG spent a total of **28.5** hours and **\$22,003.00** in fees during the Interim
5 Compensation Period in the Case Administration category. BG spent approximately 3.09% of its
6 time in this category during the Interim Compensation Period.

7 **D. Claims Administration (Task Code 120).**

8 78. This category includes specific claim inquiries, analysis, objections and allowances of
9 claims. During the Interim Compensation Period, BG reviewed and analyzed certain scheduled and
10 filed claims, and corresponded with claimants regarding their claims. BG also spent time
11 corresponding with the Debtor's financial advisor regarding potential objections to filed claims.

12 79. BG spent time in this category preparing seven omnibus objections to filed claims
13 and three objections to specific claims filed by the Debtor's members asserting that the claims were
14 secured by the Debtor's property.

15 80. BG spent time in this category preparing a reply to a response filed by claimant James
16 Harriss to the Debtor's first omnibus objection to certain member claims. BG also spent time
17 preparing stipulations to resolve the Debtor's objections to certain claims and preparing notices of
18 withdrawal of the Debtor's objection to certain claims.

19 81. BG spent time in this category preparing for and attending the hearings on the
20 Debtor's first and second omnibus objections to certain member claims and preparing the related
21 orders.

22 82. BG also spent time in this category responding to and analyzing LVDF's motion to
23 quash, which was filed in connection the Debtor's 2004 Motions. BG also spent time in this
24 category corresponding with counsel for LVDF regarding its claim and a potential consensual
25 resolution of the same and negotiating a consensual resolution of LVDF's motion to quash.

26 83. BG devoted time in this category to obtaining, analyzing, and reviewing documents
27 produced by LVDF in the LVDF Litigation in connection with the Debtor's objection to LVDF's
28 claim.

1 84. BG also spent time in this category analyzing and preparing an objection to LVDF's
2 claim.

3 85. BG devoted time in this category to preparing the Debtor's mediation statement for
4 its mediation with LVDF regarding the LVDF Litigation and the Debtor's objection to LVDF's
5 claim.

6 86. BG spent time in this category corresponding with counsel for Dianne Meacher
7 regarding the Debtor's Bankruptcy Rule 2004 examination of Dianne Meacher. BG also spent time
8 in this category for preparing a complaint against Meacher and Dianne Meacher for avoidance of
9 fraudulent transfers and objection to Meacher's claim.

10 87. BG also spent time in this category corresponding with the Debtor's tax accountant
11 and the Internal Revenue Service regarding various issues related to the proofs of claim filed by the
12 Internal Revenue Service.

13 88. BG spent a total of **220.8** hours and **\$114,242.00** in fees during the Interim
14 Compensation Period in the Claims Administration category. BG spent less than 23.92% of its time
15 in this category.

16 **E. Fee/Employment Applications (Task Code 130).**

17 89. This category relates to employment of professionals by the estate as well as time
18 relating to requests for compensation and reimbursement of expenses by professionals. BG's
19 employment was approved pursuant to order of this Court entered on June 30, 2022. During the
20 Interim Compensation Period, BG prepared BG's first interim application for compensation and
21 reimbursement of expenses and amended first interim application [ECF Nos. 369 and 383] and
22 Province, LLC's first interim application for compensation and reimbursement of expenses and
23 amended first interim application [ECF Nos. 358 and 382].

24 90. BG spent time reviewing the interim fee applications filed by the Committee's
25 professionals.

26 91. BG also spent time preparing for and attending the hearings on first interim
27 applications for compensation and reimbursement of expenses filed by BG, Province, LLC and the
28 Committee's professionals.

1 92. BG spent time preparing orders granting the Debtor’s application to employ
2 Greenberg Traurig, LLP and BG and Province, LLC’s first interim applications for compensation
3 and reimbursement of expenses.

4 93. BG also devoted time to preparing monthly fee statements pursuant to the *Order*
5 *Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses for*
6 *Professionals* [ECF No. 318] (the “Interim Compensation Order”) and reviewing the other
7 professionals’ monthly fee statements.

8 94. BG also spent time corresponding with counsel for the US Trustee regarding this
9 Application.

10 95. BG spent a total of **79.2** hours and **\$34,041.00** in fees during the Interim
11 Compensation Period in the Fee / Employment Application category. BG spent approximately
12 8.52% of its time in this category.

13 **F. Fee/Employment Objections (Task Code 135).**

14 96. This category relates to time spent preparing responses to objections to employment
15 applications. During the Interim Compensation Period, BG prepared a response to the US Trustee’s
16 objection to the Debtor’s application to employ Greenberg Traurig, LLP. BG also devoted time to
17 preparing responses to the Committee’s professionals’ interim applications for compensation and
18 reimbursement of expenses.

19 97. BG spent a total of **3.4** hours and **\$1,575.00** in fees during the Interim Compensation
20 Period in this category. BG spent approximately 0.37% of its time in this category.

21 **G. Financing (Task Code 140).**

22 98. This category relates to financing matters under Sections 361, 363 and 364 of the
23 Bankruptcy Code, including cash collateral, DIP Financing, secured claims, loan document analysis
24 and loan document drafting. During the Interim Compensation Period, BG provided services to the
25 Debtor in connection with the DIP Financing and various issues related to the budget and cash flow
26 projections under the DIP Financing.

27 99. BG also spent time in this category related to the exit financing and funding of the
28 Plan.

1 100. BG also devoted time in this category to reviewing and analyzing fee statements from
2 counsel for FS DIP, LLC.

3 101. BG spent a total of 7.1 hours and \$4,924.50 in fees during the Interim Compensation
4 Period in the Financing category. BG spent approximately 0.77% of its time in this category.

5 **H. Plan and Disclosure Statement (Task Code 170).**

6 102. This category relates to the preparation of the Debtor's chapter 11 plan of
7 reorganization and related disclosure statement and several amendments and supplements thereto.
8 BG spent significant time in this category strategizing with the Debtor and its financial advisor
9 regarding the Debtor's chapter 11 plan. BG also spent time conferring with the New Equity
10 Investor, the US Trustee, the Committee, and LVDF regarding the terms of the Debtor's chapter 11
11 plan. BG drafted the Debtor's first amended plan [ECF No. 337] and disclosure statement [ECF No.
12 338] and the Plan and Disclosure Statement. The revisions to the Debtor's first amended plan and
13 Plan and related disclosure statements were extensive because prior to reaching a deal with an
14 affiliate of FS DIP, LLC on plan terms, the Debtor intended to propose a very different plan (which
15 ultimately had feasibility issues).

16 103. BG spent time in this category negotiating the terms of the new equity investment
17 under the Plan.

18 104. BG spent time in this category analyzing and researching the treatment of certain
19 claims under the Debtor's chapter 11 plan, including the treatment of the Debtor's members. BG
20 also spent time in this category corresponding with various members of the Debtor regarding the
21 Plan, voting on the Plan, and the treatment of their claim under the Plan.

22 105. BG spent time in this category corresponding with Stretto, the Debtor's noticing and
23 claims agent, regarding various balloting and solicitation issues related to the Plan.

24 106. BG devoted time in this category to reviewing and responding to discovery requests
25 propounded by LVDF and the Committee in connection with approval of the Debtor's Disclosure
26 Statement and confirmation of the Plan. BG also spent time corresponding with counsel for LVDF
27 and the Committee regarding their discovery requests and a consensual resolution of the same.
28

1 107. BG spent time in this category analyzing and preparing responses to multiple
2 objections filed to the Debtor's first amended disclosure statement and the Plan.

3 108. BG spent time in this category preparing a motion for confirmation of the Plan.

4 109. BG devoted time in this category to negotiating a consensual resolution of LVDF and
5 the Committee's objections to the Debtor's Plan and preparing stipulations confirming the same.

6 110. BG also spent time in this category preparing for and attending the hearings on the
7 approval of the Disclosure Statement and confirmation of the Plan.

8 111. BG devoted time to negotiating and preparing an order confirming the Plan that was
9 approved by the New Equity Investor, the Committee, the US Trustee, LVDF, and Meacher.

10 112. BG spent time corresponding with counsel for the New Equity Investor regarding its
11 breach of the Confirmation Order and preparing a motion for contempt regarding the same. BG also
12 spent time negotiating a consensual resolution of the New Equity Investor's breach of the
13 Confirmation Order.

14 113. BG also spent time in this category preparing a motion to extend the exclusivity
15 period for the Debtor to propose a chapter 11 plan of reorganization because the Debtor had yet to
16 reach a deal regarding plan terms with the New Equity Investor.

17 114. BG spent a total of **477.0** hours and **\$318,378.00** in fees during the Interim
18 Compensation Period in the Plan and Disclosure Statement category. BG spent approximately
19 51.69% of its time in this category.

20 **I. Relief from Stay (Task Code 180).**

21 115. This category relates the termination or continuation of the automatic stay under
22 Section 362 of the Bankruptcy Code. During the Interim Compensation Period, BG prepared for and
23 attended the Court's oral ruling on RFS Motion and the related Examiner Motion and motion to
24 remand the Removed Action.

25 116. BG also devoted time corresponding with counsel for LVDF regarding a stipulation
26 resolving LVDF's stay violations.

27 117. BG spent a total of **6.9** hours and **\$5,793.50** in fees during the Interim Compensation
28 Period in the Relief from Stay category. BG spent approximately 0.75% of its time in this category.

1 **J. Litigation – General (Task Code Lit).**

2 118. The Litigation category relates litigation related to plan confirmation and in particular
3 discovery requests propounded by the Committee. During the Interim Compensation Period, BG
4 spent time preparing the Debtor’s principal for the Committee’s deposition and responding to the
5 Committee’s requests for production of documents.

6 119. BG spent a total of **20.3** hours and **\$17,662.50** in fees during the Interim
7 Compensation Period in the Litigation category. BG spent approximately 2.20% of its time in this
8 category.

9 **K. Front Sight v. Las Vegas Development Fund (Removed Action) – (Task Code**
10 **01).**

11 120. This category relates to the LVDF Litigation and the Removed Action. BG spent
12 time preparing for and attending the hearing on the Stay Violation Motion and the Court’s oral ruling
13 on LVDF’s motion to remand the Removed Action. BG spent time negotiating and preparing a
14 stipulation to resolve LVDF’s stay violations.

15 121. BG devoted time in this category to analyzing LVDF’s motion to estimate their claim.

16 122. BG also spent time in the category reviewing documents produced by LVDF in the
17 LVDF Litigation in connection with the Debtor’s objection to LVDF’s claim (some of this time
18 overlaps with time spent for Claims Administration – Task Code 120).

19 123. BG spent time in this category corresponding with counsel for LVDF regarding the
20 status of the Removed Action and discovery requests.

21 124. BG also spent time corresponding counsel for the Debtor’s principal regarding the
22 transition of the litigation and the mediation with LVDF.

23 125. BG spent a total of **36.5** hours and **\$26,278.00** in fees during the Interim
24 Compensation Period in this category. BG spent approximately 3.95% of its time in this category.

25 **L. Meacher Claim Objection – (Task Code 04).**

26 126. This category relates to services rendered by BG in connection with preparing a
27 complaint against Meacher for avoidance and recovery of fraudulent transfers and objection to
28 Meacher’s claim.

1 127. BG spent a total of **19.3** hours and **\$8,265.50** in fees during the Interim Compensation
2 Period in this category. BG spent approximately 2.09% of its time in this category.

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

4 128. Included in the attached **Exhibit 4** incorporated herein by this reference is a summary
5 of all expenses incurred in connection with BG's representation of the Debtor during the Interim
6 Compensation Period.

7 129. BG's request for reimbursement of expenses herein includes costs advanced in the
8 total amount of \$11,245.03 for reproduction, prints, scans, filing fees, research, and other out-of-
9 pocket costs and expenses necessarily incurred on behalf of the Debtor. BG makes every effort to
10 limit the expenditure of expenses and to use the most economical means available for accomplishing
11 the tasks requiring expenditure of costs.

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

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

22 132. BG charges for postage expenses incurred for mailing notices to creditors, serving
23 pleadings, and sending general correspondences in representing the Debtor. Attorney service,
24 messenger and overnight delivery services are used only when necessary, and BG attempts to avoid
25 extra charges for messenger and overnight delivery expenses when information can be transmitted
26 by other means, such as mail, e-mail or facsimile. BG attempts to use the least expensive services
27 available consistent with obtaining delivery within the time required and posts actual charges
28 incurred for these services to clients' accounts.

1 133. Computer research service expenses are passed on to the client at the actual cost
2 incurred by BG. Parking expenses and mileage are passed on to the client at the actual cost incurred
3 by BG.

4 **VIII. CONCLUSION**

5 Based on the foregoing, BG respectfully requests that the Court enter an order: (i) approving
6 the Application; (ii) allowing on a final basis fees in the amount of **\$569,489.50** and expenses in the
7 amount of **\$11,245.03** for a total amount of **\$580,734.53** for the Interim Compensation Period; (iii)
8 approving on a final basis fees and reimbursement of expenses in the amount of \$591,595.72
9 awarded to BG on an interim basis pursuant to the Order re First Interim Application; (iv)
10 authorizing BG to pay itself \$307,584.80 (plus any additional amounts submitted in a supplement for
11 time incurred from December 9, 2022 through January 9, 2023) from the funds maintained in its
12 settlement trust account pursuant to the confirmation order; (v) instructing the Reorganized Debtor
13 to pay any deficiencies in the fee award; and (vi) for such other and further relief as this Court deems
14 just and proper.

15 DATED: December 12, 2022

BG LAW LLP

17 By: /s/ Susan K. Seflin
18 Steven T. Gubner
19 Susan K. Seflin
20 Jessica S. Wellington
21 Attorneys for Chapter 11 Debtor
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27
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NVB 2016 (05/2022)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

Fee Application Cover Sheet

Case No.: 22-11824 Chapter: 11 Hearing Date/Time: 1/9/2023 09:30

Debtor: Front Sight Management, LLC

Applicant: BG Law LLP

Date of Employment: May 24, 2022

Interim Fee Application No: _____ OR Final Fee Application 1

Amounts Requested:

Client Approval: Yes No

Fees: \$ 1,147,445.00

Expenses: \$ 24,825.25

Total: \$ 1,172,270.25

Hours: 1,841.90

Blended Rate: \$ 622.97

Fees Previously Requested: \$ 577,955.50

Awarded: \$ 577,353.72

Expenses Previously Requested: \$ 13,580.22

Awarded: \$ 13,580.22

Total Previously Requested: \$ 591,535.72

Awarded: \$ 591,535.72

Total Amount Paid: \$ 864,685.45

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/ Susan K. Seflin
Signature

Date 12/12/2022

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			
[100] Asset Analysis & Recovery					
10/10/2022	SKS	Review correspondence from client regarding reimbursement to estate for pre-petition checks paid and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
11/7/2022	JSW	Draft correspondence to Higbee & Associates re automatic stay violation attempting to collect on prepetition claim	0.6	\$395.00	\$237.00
11/25/2022	JBK	Begin drafting mediation brief.	3.0	\$675.00	\$2,025.00
11/26/2022	JBK	Continue drafting mediation brief.	5.1	\$675.00	\$3,442.50
Subtotal [100] Asset Analysis & Recovery			8.9		\$5,839.50
[110] Business Operations					
10/17/2022	SKS	Review Front Sight workers compensation policy [.2] and prepare correspondence to Sam Schwartz regarding same [.1]	0.3	\$675.00	\$202.50
10/19/2022	SKS	Prepare correspondence to Sam Schwartz regarding building property insurance [.1]	0.1	\$675.00	\$67.50
10/24/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding information needed to respond to requests from equity investor [.4]	0.4	\$675.00	\$270.00
10/25/2022	SKS	Conversations (multiple) with Brad Ackman regarding transition issues [.5]	0.5	\$675.00	\$337.50
10/25/2022	SKS	Conversations (multiple) with Tanner James regarding various documents requested by new equity investor [.4]	0.4	\$675.00	\$270.00
10/25/2022	SKS	Conversations (multiple) with counsel for Dr. Piazza regarding various operational issues [.4]	0.4	\$675.00	\$270.00
10/28/2022	SKS	Conversation with Sam Schwartz regarding various issues related to business transition [.5]	0.5	\$675.00	\$337.50
10/30/2022	SKS	Review correspondence from Sam Schwartz regarding request for information about business for transition and prepare correspondence to client regarding same [.2]	0.2	\$675.00	\$135.00
10/31/2022	SKS	Prepare emails (multiple) to Brad Ackman regarding information requested by PrairieFire relating to transition of business and review emails (multiple) regarding same [.4]	0.4	\$675.00	\$270.00
11/1/2022	SKS	Review and revise chart regarding employees [.6]; prepare correspondence to Bryan Lindsey regarding same [.1]	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>
11/1/2022	SKS	Conversations (multiple) with Tanner James regarding various administrative and operational issues [.6]	0.6	\$675.00	\$405.00
11/3/2022	SKS	Conference call with PrairieFire representatives regarding business transition [1.2]	1.2	\$675.00	\$810.00
11/4/2022	SKS	Review correspondence from Joe Wesolowski regarding various requests regarding transition of business and prepare documents and detailed responses regarding same [.8]	0.8	\$675.00	\$540.00
11/7/2022	SKS	Prepare correspondence to Sam Schwartz and Bryan Lindsey regarding PrairieFire / Front Sight business meeting regarding transition and review emails regarding same [.2]; prepare internal emails as well [.1]	0.3	\$675.00	\$202.50
11/14/2022	SKS	Conversations (multiple) with Gabby Hamm regarding various issues re transition and liens on business [.8]	0.8	\$675.00	\$540.00
11/14/2022	SKS	Review correspondence and documents from Gabby Hamm regarding various liens on the property and draft response in connection with transition [.7]	0.7	\$675.00	\$472.50
11/14/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding information needed for transition of business [.5]	0.5	\$675.00	\$337.50
11/15/2022	SKS	Conversations (multiple) with Gabby Hamm regarding transition issues [.3]	0.3	\$675.00	\$202.50
11/16/2022	SKS	Conversations (multiple) with Tanner James regarding information needed for transition under plan [.4]	0.4	\$675.00	\$270.00
11/18/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding transition issues [.4]	0.4	\$675.00	\$270.00
11/24/2022	SKS	Review emails (multiple) from Ignatius Piazza regarding human resources letter sent by PrairieFire to employees and prepare correspondence to client regarding same [.4]	0.4	\$675.00	\$270.00
11/28/2022	SKS	Analysis of issues regarding transition on effective date [.8]	0.8	\$675.00	\$540.00
11/29/2022	SKS	Conversations (multiple) with Tanner James regarding various transition issues [.4]	0.4	\$675.00	\$270.00
11/29/2022	SKS	Conversation with Amanda Marciniak regarding payroll [.2]	0.2	\$675.00	\$135.00
11/29/2022	SKS	Prepare correspondence to Ignatius Piazza regarding transition of bank accounts [.1]	0.1	\$675.00	\$67.50
11/30/2022	SKS	Draft correspondence to Sam Schwartz regarding transition and review correspondence regarding same [.4]	0.4	\$675.00	\$270.00
11/30/2022	SKS	Conversation with Tanner James regarding various closing issues [.2]	0.2	\$675.00	\$135.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/30/2022	SKS	Conversation with Sam Schwartz regarding bank account transition [.1]	0.1	\$675.00	\$67.50
12/1/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding transfer of guns and updated gun logs per PF demands [.9]	0.9	\$675.00	\$607.50
12/1/2022	SKS	Review correspondence (multiple) from Ignatius Piazza regarding status of updating gun log and prepare correspondence regarding same [.4]	0.4	\$675.00	\$270.00
12/1/2022	SKS	Conversations (multiple) with Greg Garman regarding status of gun log and updating it [.2]	0.2	\$675.00	\$135.00
12/2/2022	SKS	Conversations (multiple) with Ignatius regarding status of updated gun logs and related closing issues [.8]	0.8	\$675.00	\$540.00
12/9/2022	SKS	Prepare emails (multiple) to Sam Schwartz forwarding emails from Ignatius Piazza regarding transition [.2]	0.2	\$675.00	\$135.00
Subtotal [110] Business Operations			15.0		\$10,125.00

[115] Case Administration

9/6/2022	STG	Call w John Aldrich re: potential special counsel and issues pending in the case.	0.5	\$895.00	\$447.50
9/8/2022	JLB	Call with UST re case status	0.1	\$575.00	\$57.50
9/9/2022	SKS	Appear at court's oral ruling regarding LVDF motion to appoint an examiner [.5]	0.5	\$675.00	\$337.50
9/10/2022	SKS	Conversation with Paul Huygens regarding various issues relating to committee counsel requests for documents and information that they have been provided with and related issues [.7]	0.7	\$675.00	\$472.50
9/12/2022	SKS	Conversation with Tanner James regarding information requested by Brian Shapiro, counsel for LVDF, regarding July 2022 Monthly Operating Report [.2]	0.2	\$675.00	\$135.00
9/14/2022	STG	Review death threats against Ignatius (.5) and further review of potential additional Cyber bullying (.7) and research and analyse same (.7).	1.9	\$895.00	\$1,700.50
9/14/2022	SKS	Review correspondence and documents from Ignatius Piazza regarding death threat from Jon Landwer and prepare correspondence regarding same [.5]	0.5	\$675.00	\$337.50
9/19/2022	SKS	Conversation with Leslie Sobol regarding 2021 tax returns [.3]	0.3	\$675.00	\$202.50
9/20/2022	SKS	Conversations (multiple) with Tanner James regarding August Monthly Operating Report [.6]	0.6	\$675.00	\$405.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/20/2022	SKS	Review and revise August monthly operating report [.1]; prepare correspondence to Ignatius Piazza regarding same [.1]	0.2	\$675.00	\$135.00
9/21/2022	SKS	Draft correspondence to Ed McDonald regarding supporting documentation to MORs and review correspondence regarding same [.6]	0.6	\$675.00	\$405.00
9/21/2022	SKS	Revise August monthly operating report and exhibits [.5]	0.5	\$675.00	\$337.50
9/21/2022	SKS	Conversations (multiple) with Tanner James regarding August Monthly Operating Report [.2]	0.2	\$675.00	\$135.00
9/21/2022	JT	Review voice mail from J. Peat re case status	0.1	\$270.00	\$27.00
9/28/2022	SKS	Conversation with Leslie Sobol regarding requests by equity investor for tax records and related issues [.3]	0.3	\$675.00	\$202.50
10/10/2022	SKS	Conversation with Tanner James regarding monthly operating reports [.5]	0.5	\$675.00	\$337.50
10/13/2022	SKS	Review insurance policies and prepare chart regarding same [.7]	0.7	\$675.00	\$472.50
10/13/2022	SKS	Prepare correspondence to client regarding insurance policies and information needed and review correspondence regarding same [.5]	0.5	\$675.00	\$337.50
10/13/2022	SKS	Review additional tax and account transcripts from the IRS [.3]; prepare correspondence to Greg Garman regarding same [.1]	0.4	\$675.00	\$270.00
10/14/2022	SKS	Review new commercial liability policy and compare to old [.7]; prepare correspondence to client regarding discrepancy [.1]	0.8	\$675.00	\$540.00
10/17/2022	SKS	Prepare correspondence to Greg Garman regarding balance of account and tax return transcripts from IRS and review correspondence regarding same [.2]; prepare correspondence to Sam Schwartz regarding same and review transcripts [.3]	0.5	\$675.00	\$337.50
10/17/2022	SKS	Review correspondence from George Hodges regarding change of address and prepare email to Stretto regarding same [.2]	0.2	\$675.00	\$135.00
10/19/2022	SKS	Review draft of September monthly operating report and answer questions from Tanner James regarding same [.3]	0.3	\$675.00	\$202.50
10/21/2022	SKS	Review emails (multiple) from stretto regarding service of pleadings filed today and prepare emails regarding same [.2]	0.2	\$675.00	\$135.00
10/25/2022	SKS	Review 2013, 2014 and 2015 tax returns [1.3]; prepare correspondence to Sam Schwartz regarding same [.1]	1.4	\$675.00	\$945.00
10/25/2022	SKS	Conversation with Ed McDonald regarding use of credit card to pay operating expenses [.1]	0.1	\$675.00	\$67.50
10/31/2022	SKS	Conversation with Candace Carlyon regarding request for Stretto to provide courtesy copies [.1]	0.1	\$675.00	\$67.50



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/1/2022	SKS	Conversation with Ed McDonald regarding whether or not privacy ombudsman is needed [.4]	0.4	\$675.00	\$270.00
11/4/2022	SKS	Review emails from 20+ people with identical language and begin preparing chart reflecting their interest, if any, in Front Sight [.8]	0.8	\$675.00	\$540.00
11/8/2022	STG	Prepared for and met with PF and employees [3.4]; tour facility and met with employees at FS in Pahrump [2.9]	6.3	\$895.00	\$5,638.50
11/12/2022	STG	Prepare for and conduct Call w Bob Lehane, G Garman.	1.8	\$895.00	\$1,611.00
11/14/2022	SKS	Conversations (multiple) with Kim Wheelock from Internal Revenue Service regarding unfiled 1094 and 1095 returns [.7]; draft correspondence to Leslie Sobol and Ignatius Piazza regarding same [.2]	0.9	\$675.00	\$607.50
11/15/2022	SKS	Exchange correspondence with accountant and Ignatius Piazza regarding various tax compliance issues [.6]	0.6	\$675.00	\$405.00
11/16/2022	SKS	Prepare emails (multiple) to PrairieFire regarding outstanding tax issues and review emails regarding same [.5]	0.5	\$675.00	\$337.50
11/16/2022	SKS	Conversations (multiple) with Adam Fialkowski regarding opening bank accounts under plan [.3]; conversation with Morgan Wisby regarding same [.1]	0.4	\$675.00	\$270.00
11/16/2022	SKS	Review invoice from Stretto and prepare correspondence to client regarding same [.1]	0.1	\$675.00	\$67.50
11/21/2022	SKS	Revise October monthly operating report [.3]	0.3	\$675.00	\$202.50
11/29/2022	STG	Prepare for hearing on Order and review signatures on stipulated Order [1.4]; Telephone conference with Huygens re: issues post effective date (mult) [.4]; review emails from PF and client on transition issues (mult) [.5];	2.3	\$895.00	\$2,058.50
11/30/2022	SKS	Conversation with Adam Fialkowski from Stretto regarding transition, bank accounts, etc [.5]	0.5	\$675.00	\$337.50
12/2/2022	SKS	Review emails (multiple) from Stretto regarding transition post-confirmation and draft emails regarding same [.7]	0.7	\$675.00	\$472.50
Subtotal [115] Case Administration			28.5		\$22,003.00
[120] Claims Admin					
9/1/2022	JT	Review and respond to email from D. Simister re prepetition claim, email to S. Seflin re same	0.3	\$270.00	\$81.00
9/6/2022	STG	Further review of Meacher deposition and declaration re: same.	1.9	\$895.00	\$1,700.50



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/6/2022	JLB	Analysis of issues re discovery needed from LVDF re motion to quash	0.4	\$575.00	\$230.00
9/6/2022	JT	Research re data to be received from HOLO discovery, review and respond to J. Bagdanov email re same	0.5	\$270.00	\$135.00
9/6/2022	JLB	Correspondence with Andrea Champion re motion to quash.	0.2	\$575.00	\$115.00
9/6/2022	JSW	Respond to email from David Grey regarding 2004 examination of Dianne Meacher [.1]; Review executed declaration by Ms. Meacher re the same [.1]	0.2	\$395.00	\$79.00
9/7/2022	STG	Prepare for meet and confer on discovery with LVDF counsel and review of documents (.2); meet and confer with LVDF counsel on claims and issues (1.9).	2.1	\$895.00	\$1,879.50
9/7/2022	JLB	Analysis of documents produced from Aldrich office related to LVDF claim	1.5	\$575.00	\$862.50
9/7/2022	JBK	Prepare for meet and confer regarding 2004 examination.	1.0	\$675.00	\$675.00
9/7/2022	JLB	Discovery meet and confer with Andrea Champion and Brian Shapiro [.8] memo to file re same and action items [.3]	1.1	\$575.00	\$632.50
9/7/2022	JLB	Review motion to quash pleadings in preparation for follow up meet and confer	0.8	\$575.00	\$460.00
9/7/2022	JT	Prepare Nextpoint e-discovery database for productions made in removed litigation (1.1); prepare outline of plaintiff's document productions (.6)	1.7	\$270.00	\$459.00
9/7/2022	JLB	Detailed analysis of state court confidentiality order in connection with motion to quash filed by LVDF.	0.6	\$575.00	\$345.00
9/7/2022	JLB	Strategy re motion to quash dispute, in preparation for drafting response memo to Andrea	0.6	\$575.00	\$345.00
9/7/2022	JT	Analysis of documents produced in removed action [1.1]; respond to J. Bagdanov email re review strategies [.1].	1.2	\$270.00	\$324.00
9/7/2022	JSW	Analysis of issues re motion to quash subpoena in preparation for meet and confer with LVDF's counsel	0.6	\$395.00	\$237.00
9/7/2022	JLB	Prepare responsive email to Andrea Champion re motion to quash issues	0.4	\$575.00	\$230.00
9/7/2022	JSW	Further analysis of issues re motion to quash subpoena in light of documents produced in state court action	0.3	\$395.00	\$118.50
9/7/2022	JLB	Review revised status report from Brian Shapiro [.1]; respond to email confirming same [.1]	0.2	\$575.00	\$115.00
9/7/2022	JLB	Revise joint status report re motion to quash	0.2	\$575.00	\$115.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/7/2022	JLB	Prepare responsive email to Andrea Champion re motion to quash issues in preparation for continued hearing	0.2	\$575.00	\$115.00
9/7/2022	JT	Call with J. Holpuch at HOLO Discovery re load files and available metadata in response to subpoena, prepare email to J. Bagdanov re status	0.3	\$270.00	\$81.00
9/7/2022	JSW	Review requests nos. 51, 52, 66, and 67 to LVDF in light of discussion at meet and confer to confirm relevance of requests	0.2	\$395.00	\$79.00
9/7/2022	JT	Initial review of documents provided by Nevada counsel, prepare summary of documents productions	0.2	\$270.00	\$54.00
9/9/2022	JLB	Analysis of issues re strategy in potentially seeking to mediate with LVDF	0.4	\$575.00	\$230.00
9/9/2022	JSW	Strategize re claims against LVDF and potential mediation	0.3	\$395.00	\$118.50
9/12/2022	JLB	Correspondence with LVDF counsel and Jon Holpuch re document production issues	0.3	\$575.00	\$172.50
9/12/2022	JLB	Review deposition of Dziubla	0.3	\$575.00	\$172.50
9/12/2022	JLB	Analysis of status of LVDF document production	0.1	\$575.00	\$57.50
9/12/2022	JT	Follow up re status of LVDF response and document to be produced [.1]; respond to emails from Holo discovery re same [.1]	0.2	\$270.00	\$54.00
9/13/2022	JLB	Review of documents produced by LVDF, related to objection to claim	2.0	\$575.00	\$1,150.00
9/13/2022	JT	Prepare for and import LVDF production of 15 GB of data (1.5), analysis of import issues, emails re text files and field mapping (.8); Prepare LVDF second production for import and import data to Nextpoint (1.3)	3.6	\$270.00	\$972.00
9/13/2022	JT	Initial review of LVDF document production [1.0]; email to J. Bagdanov re review strategy [.1]	1.1	\$270.00	\$297.00
9/13/2022	JT	Follow up re LVDF production review [.5]; response to email re load filed from Holo discovery [.1]	0.6	\$270.00	\$162.00
9/14/2022	JT	Analysis of import errors re LVDF prod, review and respond to J. Thuet's emails re resolving load file format issues (1.0), review and revise metadata load files for import to Nextpoint and import by volume (2.0); prepare review templates for LVDF data (.2)	3.2	\$270.00	\$864.00
9/14/2022	JSW	Review numerous documents produced by LVDF in the state court litigation	1.4	\$395.00	\$553.00
9/14/2022	JLB	Strategize re further document review needed in light of LVDF claim and need for objection	0.5	\$575.00	\$287.50



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9/14/2022	JSW	Strategize re further document review needed re objection to LVDF's claim	0.5	\$395.00	\$197.50
9/14/2022	JLB	Analysis of issues re status of negotiations re automatic stay dispute and potential impact on go-forward litigation with LVDF relating to claim	0.3	\$575.00	\$172.50
9/14/2022	JLB	Multiple correspondence with Andrea Champion re discovery documents potentially missing from production by LVDF	0.2	\$575.00	\$115.00
9/14/2022	JT	Initial review of LVDF's 19th supplemental production, review and respond to emails re link to loadable format of production	0.4	\$270.00	\$108.00
9/15/2022	JT	Continue importing LVDF production VOL0002, review and analysis of additional error reports (1.5); call with HOLO Discovery re load file issues, overlapping bates numbering and metadata load files (.3); conference with Nextpoint re options to work with metadata load file issues, review updated load file with image range, review same and import VOL0002, review additional error report (2.0)	3.8	\$270.00	\$1,026.00
9/15/2022	SKS	Conversation with Ignatius Piazza regarding claim objections to be filed [.5]	0.5	\$675.00	\$337.50
9/15/2022	JT	Further review of non redacted documents from LVDF and 19th supplemental documents, prepare coding and review templates	1.1	\$270.00	\$297.00
9/15/2022	JLB	Analysis of issues with production from LVDF in an attempt to resolve same in preparation for ongoing settlement discussions	0.4	\$575.00	\$230.00
9/15/2022	SKS	Prepare correspondence to client regarding claim objections and timing [.1]	0.1	\$675.00	\$67.50
9/16/2022	STG	Further review of discovery produced and deposition transcripts conducted in the underlying claim litigation.	2.7	\$895.00	\$2,416.50
9/16/2022	JBK	Review documents relating to claim submitted by LVDF	3.1	\$675.00	\$2,092.50
9/16/2022	JT	Prepare load files for and import to Nextpoint LVDF VOL0003 - VOL0005	2.7	\$270.00	\$729.00
9/16/2022	JLB	Analysis of issues re electronic document review on LVDF claim	0.2	\$575.00	\$115.00
9/16/2022	JT	Follow up re LVDF documents import issues, emails re same	0.2	\$270.00	\$54.00
9/18/2022	JT	Prepare review templates for LVDF Vol 002 and 003 production volumes, review and respond to emails re import irregularities with import of Vol004	0.7	\$270.00	\$189.00
9/18/2022	JT	Review and respond to Nextpoint emails re resolving issues with Vol 004 imports	0.1	\$270.00	\$27.00



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9/19/2022	JSW	Review numerous documents that LVDF produced in the underlying state court action re preparing objection to proof of claim	4.0	\$395.00	\$1,580.00
9/19/2022	JLB	Further review of deposition transcript of Dziubla as PMK for Regional Center [1.0] and LVDF [1.5], related to LVDF claim review	2.5	\$575.00	\$1,437.50
9/19/2022	JSW	Further review numerous documents produced by LVDF in the underlying state court action re preparing objection to LVDF's claim	2.1	\$395.00	\$829.50
9/19/2022	JT	Analysis of LVDF vol004, review and revise metadata field load files, import vol004, review and respond to Nextpoint emails re same	1.4	\$270.00	\$378.00
9/19/2022	JLB	Analysis of issues re discovery review relating to foreign investors	0.4	\$575.00	\$230.00
9/19/2022	JLB	Strategize re need for revisions to draft claim objection re LVDF	0.4	\$575.00	\$230.00
9/19/2022	JSW	Strategize re arguments to be made in objection to LVDF's claim.	0.3	\$395.00	\$118.50
9/19/2022	JLB	Respond to email from Andrea Champion re LVDF motion to quash meet and confer	0.1	\$575.00	\$57.50
9/20/2022	JLB	Analysis of status of document review and legal theories for objecting to LVDF claim	2.3	\$575.00	\$1,322.50
9/20/2022	SKS	Research regarding whether termination of lifetime memberships results in a claim against the estate [1.4]	1.4	\$675.00	\$945.00
9/20/2022	JSW	Further review of documents produced by LVDF in the state court action re preparing objection to their proof of claim	2.1	\$395.00	\$829.50
9/20/2022	JSW	Review of documents produced by LVDF in the state court action re preparing objection to proof of claim	1.8	\$395.00	\$711.00
9/20/2022	JSW	Strategize regarding Debtor's objection to LVDF's claim in light of review of documents produced by LVDF in the state court action	1.5	\$395.00	\$592.50
9/20/2022	JSW	Further strategize re claims against LVDF in light of the documents produced in the state court action	0.5	\$395.00	\$197.50
9/21/2022	STG	Review issues on discovery and lack of contested matter and whether the same was cured [.4]; review correspondence from J. Bagdanoff and consider resolution [.2]; further review discovery produced by LVDF [2.6]	3.2	\$895.00	\$2,864.00
9/21/2022	JLB	Follow up meet and confer call with Andrea Champion re motion to quash by LVDF and related discovery issues [.3]; memo to file re same with next steps [.1]	0.4	\$575.00	\$230.00



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9/21/2022	JLB	Preparation for follow up meet and confer with counsel re LVDF motion to quash	0.4	\$575.00	\$230.00
9/22/2022	JT	Follow up re resolving load files issues from LVDF, emails re same	0.2	\$270.00	\$54.00
9/23/2022	STG	Further review all 5 volumes/days of deposition testimony by Dizubla related LVDF claims.	2.6	\$895.00	\$2,327.00
9/28/2022	JBK	Review and revise claim objection to LVDF's claim.	1.2	\$675.00	\$810.00
9/28/2022	SKS	Review additional proofs of claim filed by members and prepare correspondence regarding objecting to claims [.7]	0.7	\$675.00	\$472.50
9/28/2022	SKS	Review and revise objection to LVDF claim [.6]; draft correspondence to client regarding same [.1]	0.7	\$675.00	\$472.50
9/28/2022	JSW	Analysis of issues re preparing objections to members claims based on amount actually paid to Debtor	0.7	\$395.00	\$276.50
9/29/2022	SKS	Revise objection to LVDF claim [.9]; review and confirm exhibits [.2]	1.1	\$675.00	\$742.50
9/29/2022	SKS	Revise Piazza declaration in support of objection to LVDF claim [.5]; prepare correspondence to Ignatius Piazza regarding same [.1]	0.6	\$675.00	\$405.00
9/29/2022	JLB	Review proposed joint status report from LVDF counsel re subpoena and motion to quash [.2]; respond to email from Andrea Champion requesting changes thereto [.1]	0.3	\$575.00	\$172.50
9/30/2022	JLB	Analysis of issues re status of disclosure statement approval and impact on claim objection process and LVDF requests for mediation	0.4	\$575.00	\$230.00
10/3/2022	JT	Review and analysis of LVDF documents from third parties.	2.2	\$270.00	\$594.00
10/4/2022	SKS	Review recently filed claims [1.1]; and draft correspondence regarding objections to Tanner James and review correspondence regarding same [.2]	1.3	\$675.00	\$877.50
10/4/2022	JSW	Draft omnibus objection to certain members' claims	1.8	\$395.00	\$711.00
10/4/2022	SKS	Conversation with Ignatius Piazza regarding various claims [.2]	0.2	\$675.00	\$135.00
10/5/2022	JSW	Draft omnibus objection to certain members' claims based on the amount paid to Debtor	2.1	\$395.00	\$829.50
10/5/2022	SKS	Review 35 new claims filed and prepare correspondence to client regarding requests for information regarding same and review correspondence regarding same [1.0]	1.0	\$675.00	\$675.00
10/5/2022	SKS	Revise omnibus objections [.8]	0.8	\$675.00	\$540.00



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10/5/2022	JSW	Draft proposed order granting Debtor's omnibus objection to certain members' claims	0.4	\$395.00	\$158.00
10/5/2022	JSW	Draft notice of hearing on Debtor's omnibus objection to certain members' claims	0.3	\$395.00	\$118.50
10/5/2022	JSW	Draft declaration of Piazza in support of Debtor's omnibus objection to certain members' claims	0.2	\$395.00	\$79.00
10/5/2022	JSW	Revise Omnibus Objection to certain members' claims	0.2	\$395.00	\$79.00
10/6/2022	SKS	Revise first omnibus objection to certain member claims [2.3]	2.3	\$675.00	\$1,552.50
10/6/2022	JSW	Review filed claims to determine which claims should be added to Debtor's omnibus claim objection to certain members' claims [1]; revise objection re the same [.2]	1.2	\$395.00	\$474.00
10/6/2022	SKS	Review emails (multiple) from creditors regarding filing claims and prepare emails (multiple) regarding same [.6]	0.6	\$675.00	\$405.00
10/6/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding information needed for omnibus objections to claims [.5]	0.5	\$675.00	\$337.50
10/6/2022	JSW	Prepare exhibits to omnibus claim objection to certain members' claims [.4]; revise declaration in support of the same [.1]; revise proposed order re the same [.1]	0.6	\$395.00	\$237.00
10/6/2022	SKS	Revise notice of hearing on omnibus objection to claims [.2]	0.2	\$675.00	\$135.00
10/6/2022	JSW	Further analysis of issues re adding additional claims to the Debtor's omnibus objection to certain members' claims	0.3	\$395.00	\$118.50
10/6/2022	JSW	Edit omnibus objection to certain members' claims [.2]; edit Piazza declaration in support thereof [.1]	0.3	\$395.00	\$118.50
10/6/2022	JT	Call from Robert Ward requesting information on pending case, review schedules, prepare email to S. Sefflin re same	0.3	\$270.00	\$81.00
10/6/2022	SKS	Revise order on first omnibus objection to member claims [.1]	0.1	\$675.00	\$67.50
10/6/2022	JSW	Analysis of issues re including additional claims in the omnibus objection to certain members' claims	0.1	\$395.00	\$39.50
10/6/2022	JSW	Analysis of issues re preparing Debtor's omnibus objection to certain members' claims	0.1	\$395.00	\$39.50
10/6/2022	JSW	Further revise omnibus objection to certain members' claims to include additional claims	0.1	\$395.00	\$39.50
10/7/2022	SKS	Conversation with Kenneth Roberts regarding proofs of claim filed and objection to claim [.6]	0.6	\$675.00	\$405.00



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10/7/2022	SKS	Review correspondence from Ignatius Piazza regarding first omnibus objection and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
10/7/2022	JSW	Review claims re preparing second omnibus objection to certain members' claims	0.2	\$395.00	\$79.00
10/9/2022	STG	Review email requests from creditors re: information and forward same to S. Seflin with instruction.	0.2	\$895.00	\$179.00
10/10/2022	SKS	Review dozens of claims filed by members in response to rejection notice [1.2]	1.2	\$675.00	\$810.00
10/10/2022	SKS	Prepare emails (multiple) to Adam Fialkowski regarding filing various claims on behalf of members and review correspondence regarding same [.8]	0.8	\$675.00	\$540.00
10/10/2022	JBK	Meet and confer with LVDF's counsel regarding discovery and potential settlement.	0.7	\$675.00	\$472.50
10/10/2022	JLB	Analysis of settlement offer from LVDF and relation to plan terms, in preparation for settlement discussion with counsel	0.6	\$575.00	\$345.00
10/10/2022	JLB	Conference call with Brian Shapiro re settlement discussions on claim	0.6	\$575.00	\$345.00
10/10/2022	JLB	Strategize re mediation with LVDF on claim issues	0.3	\$575.00	\$172.50
10/10/2022	JLB	Draft letter to Greg Garmin re settlement offer received	0.3	\$575.00	\$172.50
10/10/2022	JLB	Multiple correspondence with Brian Shapiro re claim mediation	0.2	\$575.00	\$115.00
10/10/2022	JLB	Finalize letter to Greg Garmin re settlement with LVDF	0.1	\$575.00	\$57.50
10/11/2022	JSW	Review filed claims re preparing Debtor's second omnibus objection to certain members' claims	2.0	\$395.00	\$790.00
10/11/2022	SKS	Conversation with Leslie Sobol regarding Nevada Department of Taxation claim and unfiled return [.2]; prepare correspondence to client regarding same [.1]	0.3	\$675.00	\$202.50
10/12/2022	SKS	Prepare correspondence to Martin Moss regarding filing claim and review correspondence regarding same [.2]	0.2	\$675.00	\$135.00
10/12/2022	SKS	Conversation with Leslie Sobol regarding further issues related to Nevada Department of Taxation claim and returns that need to be filed [.1]	0.1	\$675.00	\$67.50
10/13/2022	JT	Review S. Seflin email re rejection bar date notice and M. Schlenkrich inquiry, confer with S. Seflin re rejection of prepetition memberships (.2), call with M. Schlenkrich re membership, plan of reorganization and filing claim, email to M. Schlenkrich re same (.3)	0.5	\$270.00	\$135.00



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10/14/2022	SKS	Conversation with credit department from Davidson's Inc regarding whether or not Davidson's is listed as a creditor and related issues [.2]	0.2	\$675.00	\$135.00
10/17/2022	SKS	Review proof of claim 556 filed by the IRS and compare it to proof of claim 179 filed by the IRS [.2]; prepare correspondence (multiple) to IRS regarding same and request for documentation and review correspondence from Kim Wheelock regarding same [.5]	0.7	\$675.00	\$472.50
10/17/2022	JSW	Review claims filed from October 11, 2022 to October 17, 2022 re preparing Debtor's second omnibus objection to certain members' claims	0.6	\$395.00	\$237.00
10/17/2022	SKS	Review correspondence from David Huisman regarding claim and look up on member list and prepare correspondence re same [.2]	0.2	\$675.00	\$135.00
10/18/2022	SKS	Review claims to be objected to in the 2nd omnibus objection and find them in the debtor's records and prepare notes [1.5]	1.5	\$675.00	\$1,012.50
10/18/2022	SKS	Revise second omnibus objection to claims [1.1]	1.1	\$675.00	\$742.50
10/18/2022	JSW	Draft Debtor's Second Omnibus Objection to Certain Member Claims [1.1]; draft proposed order re the same [.1]; draft notice of hearing on the same [.3]; draft declaration of Dr. Piazza in support of the same [.3]	1.8	\$395.00	\$711.00
10/18/2022	SKS	Revise declaration of Ignatius Piazza in support of second omnibus objection to claim [.2]; prepare correspondence to client regarding same [.1]	0.3	\$675.00	\$202.50
10/18/2022	SKS	Prepare correspondence to Austin Sanders about filing claim and review correspondence regarding same [.3]	0.3	\$675.00	\$202.50
10/18/2022	JSW	Edit Debtor's second omnibus objection to certain members' claims	0.3	\$395.00	\$118.50
10/18/2022	JT	Call with G. Valdez re plan status, membership and filing proof of claim, review and respond to email re same	0.3	\$270.00	\$81.00
10/18/2022	JSW	Revise Debtor's second objection to certain members' claims	0.2	\$395.00	\$79.00
10/18/2022	JSW	Review claims filed on October 17, 2022 and October 18, 2022 re preparing Debtor's second omnibus objection to certain members' claims	0.2	\$395.00	\$79.00
10/19/2022	JT	Call with Thomas Marquardt (x2) re case status and filing claim re membership	0.4	\$270.00	\$108.00
10/19/2022	SKS	Revise notice of hearing on second omnibus objection to claims [.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>
10/19/2022	YD	Analysis of email and attached letter and claim demand from claimant Vaughn and review of schedules same for response.	0.2	\$280.00	\$56.00
10/20/2022	SKS	Revise third amended omnibus objection and review debtor's records regarding same [1.6]	1.6	\$675.00	\$1,080.00
10/20/2022	JSW	Continue reviewing proofs of claim vs. member spend re preparing Debtor's third omnibus objection to certain member claims	2.3	\$395.00	\$908.50
10/20/2022	JSW	Review claims as compared to Debtor's books and records re preparing Debtor's third omnibus objection to certain members' claims [1.6]; Call with Tanner at Province re the same [.4]	2.0	\$395.00	\$790.00
10/20/2022	SKS	Review claims and charts regarding third omnibus objection to claims [1.0]	1.0	\$675.00	\$675.00
10/20/2022	JSW	Draft Debtor's third omnibus objection to certain member claims [.8]; draft proposed order re the same [.2]; draft notice of hearing re the same [.5]; Draft Piazza declaration in support of the same [.1]	1.6	\$395.00	\$632.00
10/20/2022	JSW	Gather/organize exhibits to Debtor's third omnibus objection to member claims	0.9	\$395.00	\$355.50
10/20/2022	JT	Call with L. Walker regarding Brian Smith's membership and filing proof of claim	0.3	\$270.00	\$81.00
10/20/2022	JSW	Draft Debtor's third omnibus objection to certain members' claims	0.2	\$395.00	\$79.00
10/20/2022	JSW	Analysis of issues re objecting to additional member claims	0.1	\$395.00	\$39.50
10/21/2022	SKS	Revise debtor's third omnibus objection to claim [.8]	0.8	\$675.00	\$540.00
10/21/2022	JSW	Revise Debtor's third omnibus objection to certain member claims	1.3	\$395.00	\$513.50
10/21/2022	SKS	Conversation with Dave Streck regarding claim objection [.5]	0.5	\$675.00	\$337.50
10/21/2022	SKS	Conversations (multiple) with Tanner James regarding third omnibus objection to claim [.5]	0.5	\$675.00	\$337.50
10/21/2022	SKS	Review revised claim chart from Stretto [.4]	0.4	\$675.00	\$270.00
10/21/2022	JSW	Analysis of issues re Debtor's third objection to certain member claims and additional information needed	0.5	\$395.00	\$197.50
10/21/2022	JSW	Review platinum member list re preparing third objection to certain member claims	0.4	\$395.00	\$158.00
10/21/2022	JSW	Review claims re preparing Debtor's third omnibus objection to certain member claims	0.3	\$395.00	\$118.50



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/21/2022	JLB	Analysis of issues re member claim objection and additional information needed	0.2	\$575.00	\$115.00
10/21/2022	JSW	Review new claims filed to determine if any should be included in the Debtor's third objection to certain member claims	0.2	\$395.00	\$79.00
10/21/2022	JSW	Further revise Debtor's third objection to certain member claims	0.2	\$395.00	\$79.00
10/21/2022	SKS	Revise Piazza declaration in support of debtor's third omnibus claim objection [.1]	0.1	\$675.00	\$67.50
10/21/2022	JSW	Review finalized notice of Debtor's third objection to certain member claims before filing to ensure accuracy	0.1	\$395.00	\$39.50
10/21/2022	JSW	Further revise Debtor's third omnibus objection to certain member claims	0.1	\$395.00	\$39.50
10/21/2022	JSW	Review finalized declaration in support of Debtor's third omnibus objection to certain member claims to ensure accuracy before filing	0.1	\$395.00	\$39.50
10/22/2022	SKS	Review correspondence from Dave Streck regarding claim [.1]	0.1	\$675.00	\$67.50
10/24/2022	SKS	Review emails (multiple) from Dave Streck regarding claim and prepare emails (multiple) regarding same [.3]	0.3	\$675.00	\$202.50
10/24/2022	SKS	Review correspondence from Keith Dilley regarding claim and related issues and prepare response [.2]	0.2	\$675.00	\$135.00
10/24/2022	SKS	Review correspondence from Dr. Hulbert regarding proof of claim and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
10/24/2022	JT	Call with S. Kennedy re amount of claim and filing proof of claim	0.3	\$270.00	\$81.00
10/24/2022	SKS	Review correspondence from Paul Giaccio regarding claim and prepare correspondence regarding same [.1]	0.1	\$675.00	\$67.50
10/24/2022	JT	Call with Kelly Griffin and S. Seflin re amount of claim	0.2	\$270.00	\$54.00
10/24/2022	JT	Review email from Dr. Hurlbert, email to S. Seflin re inquiry of amount paid for membership	0.1	\$270.00	\$27.00
10/25/2022	JSW	Draft notice of withdrawal of the Debtor's objection to Claim No. 244-1 filed by David Streck	0.3	\$395.00	\$118.50
10/25/2022	JT	Review call from Melinda Douth, forward email contact information for inquiries	0.2	\$270.00	\$54.00
10/25/2022	JT	Review and respond to email from R. Malsbary re family memberships and filing claims	0.2	\$270.00	\$54.00
10/26/2022	JT	Telephone call with M. Fuller re membership and filing of proof of claim	0.2	\$270.00	\$54.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/27/2022	JLB	Strategy and analysis related to claims in Meacher complaint	0.8	\$575.00	\$460.00
10/27/2022	SKS	Conversation with Matthew Casavant regarding objection to his claim and related issues [.6]	0.6	\$675.00	\$405.00
10/27/2022	JSW	Review claims filed from October 20 through October 27, 2022 re preparing Debtor's fourth objection to certain member claims	0.8	\$395.00	\$316.00
10/27/2022	JSW	Draft stipulation resolving Debtor's second omnibus objection as it relates to Claim No. 239-1 filed by Matthew Casavant [.5]; draft order re the same [.2]	0.7	\$395.00	\$276.50
10/27/2022	SKS	Conversation with Randall Teigland regarding claim and plan [.4]	0.4	\$675.00	\$270.00
10/27/2022	JT	Call (2x) from Mr. Casavant re concerns about notice and hearing dates and contents of omnibus claims objections	0.3	\$270.00	\$81.00
10/27/2022	JSW	Review correspondence from Matthew Casavant re preparing stipulation to resolve Debtor's objection to claim no. 239-1	0.1	\$395.00	\$39.50
10/27/2022	JT	Call with R. Teigland re filing claims	0.1	\$270.00	\$27.00
10/27/2022	JT	Call with M. Long re proof of claim	0.1	\$270.00	\$27.00
10/28/2022	JBK	Review and revise complaint and objection to Meacher claim.	1.0	\$675.00	\$675.00
10/28/2022	SKS	Review correspondence and documents from Rick Mantin regarding claim and compare to debtor's books and records [.4]	0.4	\$675.00	\$270.00
10/28/2022	SKS	Conversation with Matt Lockitski regarding 3rd omnibus objection to claim [.4]	0.4	\$675.00	\$270.00
10/28/2022	SKS	Revise stipulation resolving objection to Casavant claim [.1]; prepare correspondence to Matthew Casavant regarding same and review correspondence regarding same [.2]	0.3	\$675.00	\$202.50
10/28/2022	SKS	Prepare notice of withdrawal of Lockitski claim [.1]; prepare correspondence to M. Lockitski regarding same [.1]	0.2	\$675.00	\$135.00
10/31/2022	SKS	Research regarding treatment of lifetime membership claims [2.1]	2.1	\$675.00	\$1,417.50
10/31/2022	SKS	Conversation with Ken Falerios regarding claim and related issues [.5]; review correspondence and debtor's books and records regarding same [.2]; prepare correspondence regarding same [.1]	0.8	\$675.00	\$540.00
10/31/2022	SKS	Conversation with Brian Pavey regarding objection to claim [.5]; review documents regarding same [.2]	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>
10/31/2022	SKS	Review documents provided by Rick Mantin in support of claim and prepare correspondence to Rick Mantin regarding same [.4]; prepare correspondence to Ignatius Pizza regarding potential withdrawal of claim [.1]	0.5	\$675.00	\$337.50
10/31/2022	SKS	Review letter opposition to claim objection from Bruce Logie [.1]; prepare correspondence to client regarding same [.1]; prepare correspondence to Bruce Logie regarding same [.1]	0.3	\$675.00	\$202.50
10/31/2022	JT	Call with K. Falerios re membership and claim information, review email re family memberships, email to S. Seflin re same	0.2	\$270.00	\$54.00
10/31/2022	JSW	Review letter from Bruce Logie opposing Debtor's omnibus claim objection.	0.1	\$395.00	\$39.50
11/1/2022	SKS	Review correspondence and documents from Bruce Logie regarding refund payment and prepare emails (multiple) regarding same [.5]	0.5	\$675.00	\$337.50
11/1/2022	JSW	Review claims 676 through 744 re preparing the Debtor's fourth omnibus objection to certain member claims	0.8	\$395.00	\$316.00
11/1/2022	SKS	Review correspondence from Rick Mantin regarding amendments to claims and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
11/1/2022	JSW	Review correspondence and documents sent by Brian Pavey re support for the amount of his claim [.1]; Draft notice of withdrawal of the Debtor's objection to Brian Pavey's POC 270-1 [.2]	0.3	\$395.00	\$118.50
11/1/2022	JSW	Draft notice of withdrawal of the Debtor's objection to Rick Mantin's proof of claim 212	0.2	\$395.00	\$79.00
11/1/2022	JSW	Review finalized notices to withdraw the Debtor's objection to POCs 270 and 212	0.1	\$395.00	\$39.50
11/2/2022	SKS	Conversation with Ignatius Piazza regarding fourth omnibus objections to claims [.9]	0.9	\$675.00	\$607.50
11/2/2022	SKS	Review correspondence and claim from Grant Janssen [.2]; prepare chart regarding amounts owed [.7]	0.9	\$675.00	\$607.50
11/2/2022	STG	Review multiple claims filed/received and ballots in LV office.	0.5	\$895.00	\$447.50
11/2/2022	JBK	Review treatment of LVDF's claim under proposed plan of reorganization.	0.6	\$675.00	\$405.00
11/2/2022	SKS	Conversation with Ignatius Piazza regarding multiple proofs of claim and whether to object [.5]	0.5	\$675.00	\$337.50
11/2/2022	SKS	Conversation with James Richardson regarding claim [.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>
11/3/2022	STG	Review 30 relatively similar emails from disgruntled former members with regard to Case, Plan and membership.	1.8	\$895.00	\$1,611.00
11/3/2022	JSW	Draft Fourth Omnibus Objection to Certain Member Claims [2]; Draft proposed order [.2]; draft notice of hearing on the same [.3]; draft declaration in support of the same [.2]	2.7	\$395.00	\$1,066.50
11/3/2022	JSW	Review filed claims re preparing Debtor's fourth omnibus objection to certain member claims	2.5	\$395.00	\$987.50
11/3/2022	SKS	Conversation with Tom Fitzgerald regarding claim and status of case [.8]	0.8	\$675.00	\$540.00
11/3/2022	SKS	Review additional claims filed [.7]	0.7	\$675.00	\$472.50
11/3/2022	SKS	Conversation with German Guerrero regarding claim and related issues [.6]	0.6	\$675.00	\$405.00
11/3/2022	SKS	Conversation with Mark Puglisi regarding claim and status of case [.6]	0.6	\$675.00	\$405.00
11/3/2022	SKS	Conversation with Ignatius Piazza regarding next omnibus objection to claim [.4]	0.4	\$675.00	\$270.00
11/3/2022	JSW	Revise Debtor's Fourth Omnibus Objection to Certain Member Claims [.4]; revise exhibits re the same [.1]	0.5	\$395.00	\$197.50
11/3/2022	SKS	Review claim filed by Paul MacDonald [.1]; compare to debtor's records [.1]	0.2	\$675.00	\$135.00
11/3/2022	JSW	Review filed claims re preparing Debtor's fourth omnibus objection to certain member claims	0.2	\$395.00	\$79.00
11/3/2022	JT	Review message from S. Kennedy re filing proof of claim, email to S. Seflin re same	0.1	\$270.00	\$27.00
11/4/2022	SKS	Review and revise debtor's fourth omnibus objection to claim [.7]	0.7	\$675.00	\$472.50
11/4/2022	SKS	Review correspondence and documents from Andrea Shubin regarding backup for claim [.6]	0.6	\$675.00	\$405.00
11/4/2022	JSW	Review claims filed on November 3, 2022 and November 4, 2022 re preparing Fourth Omnibus Objection to certain member claims [.5]; revise objection re the same [.1]; revise notice re the same [.1]; revise proposed order re the same [.1]; revise Piazza declaration re the same [.1]; revise exhibit 1 to objection re the same [.1]	1.0	\$395.00	\$395.00
11/4/2022	SKS	Conversation with Kira Gilbert regarding claim and related issues [.3]; review correspondence from K. Gilbert regarding same [.2]	0.5	\$675.00	\$337.50



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11/4/2022	SKS	Conversation with Paul Atwood regarding claim and membership [.4]; review correspondence from Paul Atwood regarding same [.1]	0.5	\$675.00	\$337.50
11/4/2022	SKS	Conversation with Gena Valdez regarding claim and related issues [.5]	0.5	\$675.00	\$337.50
11/4/2022	SKS	Conversations (multiple) with Ron Genova regarding claim [.4]	0.4	\$675.00	\$270.00
11/4/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding objections to claims [.4]	0.4	\$675.00	\$270.00
11/4/2022	SKS	Conversations (multiple) with Spence Kennedy regarding claim [.4]	0.4	\$675.00	\$270.00
11/4/2022	SKS	Conversation with Andrea Shubin regarding claim [.4]	0.4	\$675.00	\$270.00
11/4/2022	JSW	Further revise Debtor's fourth omnibus objection to certain member claims	0.4	\$395.00	\$158.00
11/4/2022	JSW	Draft amended fourth omnibus objection and related pleadings	0.4	\$395.00	\$158.00
11/4/2022	SKS	Review correspondence from Thomas Nugent regarding alleged claim and draft response [.2]	0.2	\$675.00	\$135.00
11/4/2022	JSW	Review finalized amended fourth omnibus objection to certain member claims and related pleadings	0.2	\$395.00	\$79.00
11/4/2022	JSW	Review Debtor's Fourth Omnibus Objection to certain member claims	0.2	\$395.00	\$79.00
11/4/2022	JSW	Multiple correspondence with Piazza re declaration in support of Debtor's fourth objection to certain member claims	0.2	\$395.00	\$79.00
11/4/2022	JSW	Review finalized Fourth Omnibus Objection and related pleadings before filing	0.1	\$395.00	\$39.50
11/7/2022	SKS	Conversation with Spence Kennedy regarding amending claim and related issues [.5]	0.5	\$675.00	\$337.50
11/7/2022	SKS	Conversation with T. Lempke regarding claim [.3]	0.3	\$675.00	\$202.50
11/7/2022	SKS	Review response to objection filed by James Harriss [.2]; review declaration [.1]	0.1	\$675.00	\$67.50
11/8/2022	SKS	Review updated claim chart [.7]; begin identifying additional claims to object to [.6]	1.3	\$675.00	\$877.50
11/9/2022	JSW	Research regarding rejections damages and lifetime memberships re preparing reply to response filed by James Harris re Debtor's First Omnibus Objection to Certain Member Claims	3.4	\$395.00	\$1,343.00



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11/9/2022	SKS	Review claims sent to BG Law and prepare correspondence to Stretto requesting they be filed [.2]	0.2	\$675.00	\$135.00
11/9/2022	JLB	Analysis of need for claim objection on new claims re membership	0.2	\$575.00	\$115.00
11/10/2022	SKS	Draft reply to Harriss response to first omnibus objection [1.4]	1.4	\$675.00	\$945.00
11/10/2022	SKS	Research regarding treatment of membership claims [1.3]	1.3	\$675.00	\$877.50
11/10/2022	JSW	Further draft reply to response to Debtor's First Omnibus Objection	2.2	\$395.00	\$869.00
11/10/2022	SKS	Review correspondence to IRS regarding claim from accountant and production of W-2s from 2018 [.5]; prepare correspondence to IRS agent regarding same [.2]	0.7	\$675.00	\$472.50
11/10/2022	SKS	Further revise reply to Harriss response to claim objection [.4]	0.4	\$675.00	\$270.00
11/10/2022	SKS	Conversation with Leslie Sobol regarding IRS claim [.3]	0.3	\$675.00	\$202.50
11/11/2022	JSW	Draft Debtor's Fifth Omnibus Objection to Certain Member Claims	1.3	\$395.00	\$513.50
11/11/2022	JSW	Call with Province re analysis of proposed objections to claims	0.3	\$395.00	\$118.50
11/11/2022	JSW	Analysis of proposed objections to claims prepared by Province	0.2	\$395.00	\$79.00
11/14/2022	JSW	Review proofs of claim filed since November 4, 2022 as compared to Debtor's books and records [2.5]; draft Debtor's fifth omnibus objection to certain member claims [1]; gather/organize exhibits to Debtor's fifth omnibus objection [.6]	4.1	\$395.00	\$1,619.50
11/14/2022	JSW	Draft Debtor's first omnibus objection to duplicate claims [1.3]; draft proposed order re the same [.2]; draft declaration in support of the same [.2]; draft notice of hearing re the same [.2]	1.9	\$395.00	\$750.50
11/14/2022	SKS	Review various claims and evidence attached regarding whether or not objections should be filed [.7]; prepare correspondence to J. Wellington and T. James regarding same and review correspondence regarding same [.4]	1.1	\$675.00	\$742.50
11/14/2022	JSW	Prepare Debtor's First Omnibus Objection to Duplicate Claims	0.8	\$395.00	\$316.00
11/14/2022	JSW	Review claims register re preparing Debtor's omnibus objection to duplicative claims	0.8	\$395.00	\$316.00
11/14/2022	JSW	Draft notice of hearing on Debtor's fifth omnibus objection to certain member claims [.2]; revise fifth omnibus objection [.5]	0.7	\$395.00	\$276.50
11/14/2022	SKS	Review correspondence from Stacey Edwards regarding support for claim [.1]; review debtor's records [.1]; draft response [.2]	0.4	\$675.00	\$270.00



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11/14/2022	SKS	Review correspondence from Mike Bittner regarding claim and prepare response [.3]	0.3	\$675.00	\$202.50
11/14/2022	JSW	Analysis of proposed objections to amended claims	0.4	\$395.00	\$158.00
11/14/2022	SKS	Conversation with Leslie Sobol regarding IRS tax claim and forms due [.1]; review correspondence from Leslie Sobol regarding same and prepare correspondence regarding same [.1]	0.2	\$675.00	\$135.00
11/14/2022	SKS	Review correspondence and documents from Jorge Ragde regarding claim and prepare correspondence to client regarding same [.2]	0.2	\$675.00	\$135.00
11/14/2022	JSW	Call with Tanner James at Province re proposed objections to claims [.1]; email to Tanner re the same [.1]	0.2	\$395.00	\$79.00
11/14/2022	JSW	Draft proposed order sustaining Debtor's Fifth Omnibus Objection to Certain Member Claims [.1]; Draft Piazza Decl. in support of the Debtor's Fifth Omnibus Objection to Certain Member Claims [.1]	0.2	\$395.00	\$79.00
11/14/2022	JSW	Email to Province re proposed objections to certain member claims	0.1	\$395.00	\$39.50
11/15/2022	JSW	Draft Debtor's omnibus objection to claims that assert an incorrect priority [2.5]; draft proposed order re the same [.2]; draft notice of hearing re the same [.2]; draft declaration in support of the same [.2]	3.1	\$395.00	\$1,224.50
11/15/2022	JSW	Review claims asserting priority status re preparing Debtor's omnibus objection thereto	2.7	\$395.00	\$1,066.50
11/15/2022	JLB	Strategize re omnibus objection on priority claim issues	0.4	\$575.00	\$230.00
11/15/2022	SKS	Conversation with Thomas Lempke regarding filing proof of claim and related issues [.3]	0.3	\$675.00	\$202.50
11/15/2022	JLB	Analysis of issues re additional claim objection on membership interest claims incorrectly claimed as secured	0.1	\$575.00	\$57.50
11/15/2022	JT	Review message from J. O'Donnell, and S. Sefflin's email re company records re membership amounts	0.2	\$270.00	\$54.00
11/15/2022	JT	Review message from F. Delia, email to S. Sefflin re same	0.1	\$270.00	\$27.00
11/16/2022	SKS	Review emails (multiple) from Leslie Sobol regarding Nevada Department of Taxation claim and returns due [.2]; prepare emails regarding same [.3]; and research regarding same [.4]	0.9	\$675.00	\$607.50
11/16/2022	JSW	Analysis of response to Debtor's Third Omnibus Objection to certain member claims filed by Ward Stringham [.1]; analysis of Declaration of Ward Stringham filed in support thereof [.1]	0.2	\$395.00	\$79.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/17/2022	JSW	Draft objection to proof of claim 109-1 filed by Steven Nessen [1.4]; draft exhibit 2 (proposed order) thereto [.2]; draft notice of hearing on the same [.2]	1.8	\$395.00	\$711.00
11/17/2022	SKS	Prepare for hearings on omnibus objections [.9]	0.9	\$675.00	\$607.50
11/17/2022	JSW	Draft omnibus declaration of Piazza in support of objections to claims 109-1, 454-1, and 844-1.	0.5	\$395.00	\$197.50
11/17/2022	JSW	Draft objection to proof of claim 454-1 filed by Charles Schmidt [.3]; draft related proposed order [.1]; draft notice of hearing on the same [.1]	0.5	\$395.00	\$197.50
11/17/2022	JSW	Draft objection to claim 844-1 filed by Steven Caston [.2]; draft proposed order sustaining the same [.1]; draft notice of hearing re the same [.1]	0.4	\$395.00	\$158.00
11/17/2022	JSW	Revise proposed order sustaining Debtor's first omnibus objection to certain member claims based on discussions with Stacey Edwards [.1]; revise proposed order sustaining Debtor's second omnibus objection to certain member claims based on the Debtor's withdrawal of the objection as to certain claims [.1]; revise proposed order sustaining Debtor's third omnibus objection to certain member claims based on the Debtor's withdrawal of the objection as to certain claims [.1]	0.3	\$395.00	\$118.50
11/17/2022	JSW	Review claims re preparing objections to member claims that assert the claim is secured	0.2	\$395.00	\$79.00
11/18/2022	SKS	Appear at hearing on first and second omnibus objections to claim [.8]	0.8	\$675.00	\$540.00
11/18/2022	JSW	Revise Debtor's Fifth Omnibus Objection to Certain Member Claims based on newly filed claims	0.3	\$395.00	\$118.50
11/18/2022	JSW	Revise order sustaining in part Debtor's first omnibus objection to certain member claims	0.3	\$395.00	\$118.50
11/18/2022	JSW	Analysis of recently filed claims re preparing Debtor's fifth omnibus objection	0.2	\$395.00	\$79.00
11/18/2022	JSW	Revise order sustaining the Debtor's second omnibus claim objection	0.2	\$395.00	\$79.00
11/18/2022	JSW	Revise proposed order re Debtor's third omnibus objection to reflect withdrawn objections to certain claims	0.2	\$395.00	\$79.00
11/18/2022	JSW	Review Debtor's records re response filed by Claimant Ward Stringham to Debtor's Third Omnibus Objection	0.2	\$395.00	\$79.00
11/23/2022	JSW	Email to Province re claim objections that need to be filed	0.1	\$395.00	\$39.50
11/25/2022	SKS	Review emails (multiple) from Ignatius Piazza regarding Harriss claim objection and prepare emails regarding same [.2]	0.2	\$675.00	\$135.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/26/2022	SKS	Review emails (multiple) from Stacey Edwards regarding membership and claim and prepare emails regarding same [.2]	0.2	\$675.00	\$135.00
11/27/2022	JBK	Begin drafting mediation statement for mediation with LVDF re objection to their claim.	3.8	\$675.00	\$2,565.00
11/28/2022	JSW	Analysis of issues re finalizing Debtor's fifth, sixth, seventh omnibus claim objections [.5]; email to Dr. Piazza re the same [.1]	0.6	\$395.00	\$237.00
11/28/2022	JSW	Review comments from Tanner James re Debtor's Fifth Omnibus Objection [.1]; review Debtor's books and records re the same [.1]; email to Tanner James re the same to clarify comments [.1]	0.3	\$395.00	\$118.50
11/29/2022	JSW	Further revise Debtor's Fifth Omnibus Objection [.1]; Revise Debtor's Sixth Omnibus Objection [.2]; Revise Debtor's Seventh Omnibus Objection [.1]; Revise Debtor's Objection to Claim 109 [.1]; Revise Debtor's Objection to Claim 454 [.1]; Revise Debtor's Objection to Claim 844 [.1]	0.7	\$395.00	\$276.50
11/29/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding information needed for additional claim objections [.4]	0.4	\$675.00	\$270.00
11/29/2022	SKS	Revise Piazza declaration in support of fifth omnibus objection [.1]; revise Piazza declaration in support of sixth and seventh omnibus objections [.1]; revise Piazza declaration in support of objections to claims filed as secured [.2]	0.4	\$675.00	\$270.00
11/29/2022	SKS	Revise sixth omnibus objection to claims [.2]; revise seventh omnibus objection to claims [.2]	0.4	\$675.00	\$270.00
11/29/2022	JSW	Review finalized Fifth Omnibus Objection and related pleadings [.1]; Review finalized Sixth Omnibus Objection and related pleadings [.1]; Review finalized Seventh Omnibus Objection and related pleadings [.1]; Review finalized objection to claim 844 and related pleadings [.1]; Review finalized objection to claim 454 and related pleadings [.1]; review finalized objection to claim 109 and related pleadings [.1]	0.6	\$395.00	\$237.00
11/29/2022	SKS	Revise fifth omnibus objection to claims [.3]	0.3	\$675.00	\$202.50
11/29/2022	SKS	Revise objection to claim 844 filed by Steven Caston [.3]	0.3	\$675.00	\$202.50
11/29/2022	JSW	Revise Debtor's Fifth Omnibus Objection to certain member claims [.1]; revise proposed order re the same [.1]; revise exhibit 1 re the same [.1]; revise declaration in support of the same [.1]; revise notice of hearing re the same [.1]	0.5	\$395.00	\$197.50
11/29/2022	JLB	Analysis of claim objection status and next steps re additional objections	0.3	\$575.00	\$172.50
11/29/2022	SKS	Revise order on second omnibus objection per hearing [.2]	0.2	\$675.00	\$135.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/29/2022	SKS	Conversation with Tim Gallo regarding claim [.2]	0.2	\$675.00	\$135.00
11/29/2022	JSW	Analysis of issues re finalizing Debtor's Fifth, Sixth, and Seventh Omnibus Objections	0.2	\$395.00	\$79.00
11/29/2022	JSW	Revise Debtor's Sixth Omnibus Objection to duplicate claims	0.2	\$395.00	\$79.00
11/29/2022	SKS	Revise order on first omnibus objection [.1]	0.1	\$675.00	\$67.50
11/30/2022	JSW	Review correspondence and documents from William Feczko re Debtor's objection to his claims [.2]; Draft stipulation resolving Debtor's Sixth Omnibus Objection as it relates to the claims filed by William Feczko [.4]; draft related order [.2]	0.8	\$395.00	\$316.00
12/1/2022	SKS	Review correspondence from Marty Feczko regarding stipulation resolving claim objection and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
12/1/2022	JSW	Revise proposed order granting Debtor's seventh omnibus objection to claims [.1]	0.1	\$395.00	\$39.50
12/1/2022	JSW	Revise proposed order granting Debtor's fifth omnibus objection to claims [.1]	0.1	\$395.00	\$39.50
12/1/2022	JSW	Revise proposed order granting Debtor's fourth omnibus objection to claims [.1]	0.1	\$395.00	\$39.50
12/1/2022	JSW	Revise proposed order granting Debtor's sixth omnibus objection to claims [.1]	0.1	\$395.00	\$39.50
12/1/2022	JSW	Revise proposed order granting Debtor's objection to Claim 844 [.1]	0.1	\$395.00	\$39.50
12/1/2022	JSW	Revise proposed order granting Debtor's third omnibus objection to claims [.1]	0.1	\$395.00	\$39.50
12/1/2022	JSW	Revise proposed order granting Debtor's objection to Claim 109 [.1]	0.1	\$395.00	\$39.50
12/1/2022	JSW	Revise proposed order granting Debtor's objection to Claim 454 [.1]	0.1	\$395.00	\$39.50
Subtotal [120] Claims Admin			220.8		\$114,424.00
<u>[130] Fee/Employment Applications</u>					
9/8/2022	YD	Analysis of email from J. Wellington re Aug 2022 Fee Statement and Deadline thereof and requested Proforma of Fees and Costs and respond to same [.1] preparation of Fees and Costs backup documents for August 2022 Fee Statement and email to J. Wellington same [.5].	0.6	\$280.00	\$168.00
9/8/2022	JSW	Strategize re preparing monthly fee statement	0.1	\$395.00	\$39.50



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/12/2022	YD	Analysis of documents and preparation of BG Monthly Fee Statement for August 2022 and preparation of final version of backup documents for 2nd Fee Statement.	1.4	\$280.00	\$392.00
9/12/2022	JSW	Edit monthly fee statement #2 for the period between August 1 through August 31.	0.5	\$395.00	\$197.50
9/12/2022	JSW	Review second monthly fee statement	0.5	\$395.00	\$197.50
9/12/2022	YD	Preparation and finalize Exhibits to BG Fee Statement and format; and prep of email to J. Wellington on same.	0.2	\$280.00	\$56.00
9/12/2022	YD	Tel conference with S. Gubner re Aug 2022 Fee Statement and filing of same; analysis of emails from J. Wellington re BG 2nd Fee Statement and respond to same.	0.2	\$280.00	\$56.00
9/13/2022	YD	Analysis of revised BG Fee Statement and update backup documents thereto.	0.2	\$280.00	\$56.00
9/14/2022	SKS	Review fee statements from committee professionals and compare to budget [.6]; draft correspondence to committee professionals regarding debtor overpayment of fees [.3]	0.9	\$675.00	\$607.50
9/14/2022	JSW	Draft BG's first interim application for compensation	0.5	\$395.00	\$197.50
9/14/2022	SKS	Review and revise Province 2nd monthly fee statement [.1]; prepare correspondence to Eric Mattson regarding same [.1]	0.2	\$675.00	\$135.00
9/14/2022	SKS	Prepare BG monthly fee statement [.2]	0.2	\$675.00	\$135.00
9/14/2022	JSW	Analysis of issues re the amount allocated to BG under the Debtor's budget [.2]; Revise BG's second monthly fee statement re the same [.1]	0.3	\$395.00	\$118.50
9/14/2022	JSW	Review finalized second monthly fee statement	0.3	\$395.00	\$118.50
9/14/2022	JSW	Analysis of issues re preparing BG first interim fee application	0.3	\$395.00	\$118.50
9/14/2022	JSW	Review Province's second monthly fee statement	0.2	\$395.00	\$79.00
9/14/2022	SKS	Finalize BG second monthly fee statement [.1]	0.1	\$675.00	\$67.50
9/14/2022	YD	Analysis of email from J. Wellington re Interim Fee Hearing and review of documents of notice of hearing and deadline; and prep of email response to J. Wellington on same.	0.2	\$280.00	\$56.00
9/14/2022	JSW	Analysis of issues re preparing BG's first interim fee application.	0.1	\$395.00	\$39.50
9/15/2022	JSW	Draft first interim fee application	0.5	\$395.00	\$197.50
9/15/2022	SKS	Review committee counsel second monthly fee statement [.1]	0.1	\$675.00	\$67.50



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/16/2022	YD	Analysis of documents and preparation of draft of proforma of fees and costs for 1st interim fee app in case; and format same and email to J. Wellington on same.	1.0	\$280.00	\$280.00
9/20/2022	JSW	Draft BG fee application	1.3	\$395.00	\$513.50
9/21/2022	SKS	Prepare BG interim fee application [1.6]	1.6	\$675.00	\$1,080.00
9/21/2022	JSW	Further draft BG's first interim fee application	2.5	\$395.00	\$987.50
9/21/2022	JSW	Draft BG's first interim fee application	2.0	\$395.00	\$790.00
9/21/2022	JSW	Further draft BG's first interim fee application	1.8	\$395.00	\$711.00
9/21/2022	STG	Review issues on Fee submission and payment.	0.2	\$895.00	\$179.00
9/21/2022	SKS	Prepare correspondence to Greenberg Traurig terminating their retention and providing info on filing final fee application [.2]	0.2	\$675.00	\$135.00
9/21/2022	JSW	Draft declaration of S. Gubner in support of BG's first interim fee application	0.3	\$395.00	\$118.50
9/21/2022	JSW	Further draft BG's first interim fee application	0.2	\$395.00	\$79.00
9/21/2022	JSW	Draft declaration of Dr. Piazza in support of BG's First Interim Fee Application	0.2	\$395.00	\$79.00
9/21/2022	YD	Analysis of email from S. Seflin re BG 1st Fee App and modifications to Proforma of Fees and Costs and review of attachment and respond to email on same.	0.2	\$280.00	\$56.00
9/22/2022	YD	Preparation of BG's first interim fee application and recategorized fees per S. Seflin and J. Wellington comments thereto.	4.2	\$280.00	\$1,176.00
9/22/2022	SKS	Revise BG first interim fee application [1.4]	1.4	\$675.00	\$945.00
9/22/2022	SKS	Review and revise Province first interim fee application [1.0]; prepare correspondence to Tanner James regarding same [.1]	1.1	\$675.00	\$742.50
9/22/2022	YD	Analysis of email from J. Wellington re additional changes to fees and review of attachment (.2); preparation of BG's first interim fee application and update fees and costs and finalize and reformat exhibits. (.8)	1.0	\$280.00	\$280.00
9/22/2022	JSW	Further draft BG's first interim fee application	0.5	\$395.00	\$197.50
9/22/2022	JSW	Prepare BG's first interim fee application	0.4	\$395.00	\$158.00
9/22/2022	YD	Preparation of updated Exhibits to 1st BG Fee Application.	0.4	\$280.00	\$112.00
9/22/2022	YD	Analysis of email from S. Beck/Accounting re proforma of fees and costs and updates and respond to same.	0.2	\$280.00	\$56.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/22/2022	JSW	Edit Province LLC's first interim fee application	0.1	\$395.00	\$39.50
9/23/2022	SKS	Further revise BG interim fee application [1.5]	1.5	\$675.00	\$1,012.50
9/23/2022	STG	Review Omnibus Notice of Hearing (NC) and Application on First Interim Fee Applications of BG [.3]; review of email and attachment of Application for Compensation filed by Financial Advisor PROVINCE, LLC, [.4]	0.7	\$895.00	\$626.50
9/23/2022	JSW	Draft omnibus notice of hearing on first interim applications for compensation	0.9	\$395.00	\$355.50
9/23/2022	SKS	Further review and revise Province first interim fee application [.4]	0.4	\$675.00	\$270.00
9/23/2022	SKS	Draft omnibus notice of first interim fee applications of professionals [.2]; prepare correspondence to committee counsel regarding same and review correspondence regarding same [.1]	0.3	\$675.00	\$202.50
9/23/2022	JSW	Edit BG's first interim fee application	0.3	\$395.00	\$118.50
9/23/2022	SKS	Revise Gubner declaration in support of BG first interim fee application [.1]	0.1	\$675.00	\$67.50
9/23/2022	YD	Analysis of emails from S. Seflin and J. Wellington re BG Fee App and Exhibits and review of attachment and respond to emails on final version of exhibits.	0.2	\$280.00	\$56.00
9/23/2022	JSW	Edit declaration of Dr. Piazza in support of BG and Province's first interim fee applications	0.1	\$395.00	\$39.50
9/24/2022	STG	Analysis of Interim Fee Application and Requests for Compensation and Reimbursement of Expenses of Carlyon Cica Ltd as Nevada Counsel for Committee	0.4	\$895.00	\$358.00
9/24/2022	STG	Analysis of Kelley Drye Amp Warren LLP First Interim Requests for Compensation and Reimbursement of Expenses, Supporting Documents and Declarations as Committee Counsel.	0.4	\$895.00	\$358.00
9/24/2022	STG	Analysis of 1st Interim Fee Application and Request for Reimbursement of Expenses, Supporting Documents, and Declarations of Province LLC as Financial Advisors for Debtors and email on any issues with same.	0.4	\$895.00	\$358.00
9/24/2022	STG	Analysis of Request for Compensation and Reimbursement of Expenses of Dundon Advisors LLC as Financial Advisors to Committee and Supporting Documents and Declarations.	0.4	\$895.00	\$358.00
9/24/2022	STG	Analysis of filed First Interim Fee Application and Request for Compensation of BG, Supporting Documents and Declarations In Support Thereof.	0.4	\$0.00	No Charge



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/26/2022	JSW	Draft cover sheet for BG's first interim application [.2]; draft cover sheet for Province's first interim application [.2]	0.4	\$395.00	\$158.00
9/26/2022	YD	Analysis of email from S. Gubner re Fee Applications and review thereof and respond to S. Gubner email on same and update on same.	0.4	\$280.00	\$112.00
10/5/2022	YD	Analysis of documents and preparation of proformas of fees and costs for September 2022 Fee Statement and format same; prep of email to J. Wellington.	1.2	\$280.00	\$336.00
10/5/2022	YD	Analysis of email from J. Wellington re 3rd Fee Statement and backup and review of documents on 2nd and respond J. Wellington email.	0.2	\$280.00	\$56.00
10/6/2022	STG	Review email from Schwartz on breakdown of fees [.1]; review september time for billing consistency between all counsel [1.1]; analyze time entries and total time requested by professionals with S. Seflin [.2]	1.4	\$895.00	\$1,253.00
10/6/2022	JSW	Prepare BG's September monthly fee statement	1.7	\$395.00	\$671.50
10/6/2022	JSW	Analysis of issues re preparing monthly fee statement and status of approval of revised budget allocation for BG & Province's fees	0.2	\$395.00	\$79.00
10/6/2022	YD	Prep of email transmittal to S. Seflin re 2022 Sept Fee Statement and S. Gubner comments to same and attachment; review of S. Seflin response and reply thereto.	0.2	\$280.00	\$56.00
10/6/2022	YD	Analysis of documents re September 2022 Fee Statement and tel conference with S. Gubner on same and updating and review of emails from S. Gubner and attachments and respond to emails.	0.2	\$280.00	\$56.00
10/7/2022	YD	Analysis of proforma of Fees and Costs and modification of same in compliance with Office of the U.S. Trustee requirements.	1.0	\$280.00	\$280.00
10/10/2022	SKS	Review Kelley Drye fee application and time [.4]; prepare notes regarding same [.2]	0.6	\$675.00	\$405.00
10/10/2022	SKS	Review reservation of rights filed by FS DIP to fee applications [.1]	0.1	\$675.00	\$67.50
10/11/2022	YD	Preparation of BG's September 2022 Fee Statement and finalize documents in support.	1.6	\$280.00	\$448.00
10/11/2022	SKS	Review emails (multiple) from Tanner James regarding payment of various professional fees and prepare emails (multiple) regarding same [.3]	0.3	\$675.00	\$202.50
10/11/2022	YD	Preparation of email to J. Wellington and format attachments for BG Fee Statement (Sept 2022).	0.4	\$280.00	\$112.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/12/2022	JSW	Prepare BG's 3rd Monthly Fee Statement	0.8	\$395.00	\$316.00
10/12/2022	SKS	Review monthly fee statement [.3]	0.3	\$675.00	\$202.50
10/12/2022	YD	Analysis of documents and further update and revision to BG Fee Statement as per final comments from S. Seflin and reformat updated documents and email to S. Seflin for approval.	0.6	\$280.00	\$168.00
10/14/2022	JSW	Edit BG's monthly fee statement no. 3 [.1]; Prepare BG's monthly fee statement no. 3 [.1]; prepare Province's monthly fee statement no. 3 [.1]	0.3	\$395.00	\$118.50
10/14/2022	YD	Analysis of email and attachment of final and service of BG Fee Statement and Exhibits and Providence Fee Statement/Exhibits.	0.2	\$0.00	No Charge
10/18/2022	SKS	Revise order multiple times on GT employment application per UST comments [.2]; prepare correspondence to Ed McDonald regarding same and review correspondence regarding same [.2]	0.4	\$675.00	\$270.00
10/18/2022	SKS	Conversation with Ed McDonald regarding comments on order approving GT employment [.3]	0.3	\$675.00	\$202.50
10/19/2022	SKS	Review emails (multiple) from Kent Love from Greenberg Traurig regarding GT final fee application and prepare emails (multiple) regarding same [.3]	0.3	\$675.00	\$202.50
10/19/2022	SKS	Review entered order on GT employment application and prepare correspondence to GT regarding same [.1]	0.1	\$675.00	\$67.50
10/20/2022	SKS	Review employment application filed by Greenberg Traurig [.2] and prepare correspondence to Stretto regarding serving [.1]	0.3	\$675.00	\$202.50
10/24/2022	SKS	Appear at hearing on interim fee applications [1.1]	1.1	\$675.00	\$742.50
10/24/2022	SKS	Prepare for hearings on first interim fee applications and review pleadings regarding same [.8]	0.8	\$675.00	\$540.00
10/24/2022	SKS	Review correspondence from Dawn Cica regarding order on interim fee application and prepare correspondence regarding same [.1]	0.1	\$675.00	\$67.50
10/25/2022	JSW	Draft order granting BG's first interim fee application	0.5	\$395.00	\$197.50
10/25/2022	JSW	Draft order granting Province's first interim fee application	0.2	\$395.00	\$79.00
10/28/2022	SKS	Revise order on Province interim fee application [.1]; revise order on BG interim fee application [.1]	0.2	\$675.00	\$135.00
11/3/2022	YD	Analysis of documents and preparation of proforma of fees update same and costs for Oct 2022 Fee Statement.	1.4	\$280.00	\$392.00
11/3/2022	YD	Analysis of documents and preparation of draft of 4th BG Fee Statement for period October 2022.	1.0	\$280.00	\$280.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/3/2022	YD	Analysis and revision to 4th BG Fee Statement.	0.4	\$280.00	\$112.00
11/7/2022	SKS	Review transcript from hearing on interim fee applications [.3]; prepare correspondence to Ed McDonald regarding same [.1]	0.4	\$675.00	\$270.00
11/11/2022	JSW	Prepare BG's fourth monthly fee statement	0.7	\$395.00	\$276.50
11/11/2022	JSW	Edit BG's fourth monthly fee statement for October 2022	0.1	\$395.00	\$39.50
11/15/2022	YD	Revision to Proforma of Fees and Costs and revision to BG 4th Fee Statement and finalize Exhibits and email to J. Wellington on same.	1.0	\$280.00	\$280.00
11/15/2022	JSW	Prepare BG's fourth monthly fee statement	0.3	\$395.00	\$118.50
11/15/2022	YD	Analysis of email and attachment from J. Wellington re Fee Statement and additional changes to same; and respond to email thereto.	0.2	\$280.00	\$56.00
11/16/2022	SKS	Review correspondence from Ed McDonald regarding final fee applications [.1]; prepare correspondence (multiple) to Province and Ed McDonald regarding same [.1]	0.2	\$675.00	\$135.00
11/16/2022	YD	Analysis of email from S. Seflin re final fee apps and review of underlying email from UST re same and review of attachment of UST Omnibus ROR to First Fee Applications and preparation of email response on same and review of J. Wellington email same.	0.2	\$280.00	\$56.00
11/23/2022	YD	Analysis of email from S. Gubner re Final Fee Application and review of underlying email from S. Seflin on same; review of email from J. Wellington re Final Fee Application and deadline for filing and review of email request from S. Seflin on same.	0.2	\$280.00	\$56.00
11/28/2022	YD	Analysis of S. Gubner emails on Fee Statements for November and statement through confirmation hearing and issues with same.	0.4	\$280.00	\$112.00
11/29/2022	YD	Analysis of emails from S. Seflin re confirmation, fee app and billing issues; and review of S. Dressler response and new matter information and S. Seflin responses on same and further updates.	0.2	\$280.00	\$56.00
12/7/2022	YD	Analysis of documents and preparation of proforma of fees and costs for BG Final Fee Application through confirmation and current and email documents to J. Wellington.	2.2	\$280.00	\$616.00
12/7/2022	YD	Analysis of additional S. Gubner time entries and further modifications of same for BG final fee application.	1.6	\$280.00	\$448.00
12/7/2022	SKS	Review correspondence and documents from Schwartz law regarding November fees for FS DIP and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
12/7/2022	YD	Analysis of email from J. Wellington re Final Fee Apps; review of documents and notice of effective date; respond to J. Wellington on same.	0.2	\$280.00	\$56.00
12/8/2022	SKS	Prepare final fee application [1.7]	1.7	\$675.00	\$1,147.50
12/8/2022	JSW	Further draft final fee application	2.5	\$395.00	\$987.50
12/8/2022	YD	Revision to proforma of fees and costs for BG final fee application as per S. Seflin and J. Wellington comments to attachment.	3.4	\$280.00	\$952.00
12/8/2022	JSW	Draft BG's final fee application	2.3	\$395.00	\$908.50
12/8/2022	JSW	Prepare BG's final fee application	2.2	\$395.00	\$869.00
12/8/2022	JSW	Further draft BG's final fee application	1.2	\$395.00	\$474.00
12/8/2022	JSW	Analysis of issues re preparing final fee application for Lucas Horsfall [.3]; email to Leslie Sobol re information needed for final fee application [.2]	0.5	\$395.00	\$197.50
12/8/2022	JSW	Draft S. Gubner declaration in support of BG's final fee application [.1]; draft Piazza declaration in support of BG's final fee application [.1]; draft notice of hearing re the same [.2]	0.4	\$395.00	\$158.00
12/8/2022	YD	Preparation of Exhibits to BG Fee Application and format same and email to S. Seflin and J. Wellington.	0.4	\$280.00	\$112.00
12/8/2022	YD	Analysis of email and attachments from S. Seflin for fee application; respond to email; work with Accounting on deposits and billed statements closed on reversal of same.	0.4	\$280.00	\$112.00
12/8/2022	JSW	Analysis of issues re preparing BG's final fee application	0.2	\$395.00	\$79.00
12/9/2022	STG	Analysis of BG Final Fee App and Exhibits for approval thereto.	0.4	\$895.00	\$358.00
12/9/2022	YD	Analysis of fees and costs and preparation of final proforma of same for BG Fee App and format Exhibits to same and email to S. Seflin and J. Wellington.	1.2	\$280.00	\$336.00
12/9/2022	YD	Analysis of J. Wellington email re BG Final Fee App and inclusion of time through 12/9/2022; prep of email re finalizing and deadline for same and entries thereto and review of response and reply thereto..	0.2	\$280.00	\$56.00
Subtotal [130] Fee/Employment Applications			79.2		\$34,041.00
[135] Fee/Employment Objections					
9/16/2022	JSW	Review US Trustee's objection to GT's employment application	0.2	\$395.00	\$79.00
9/20/2022	SKS	Review UST objection to GT employment application [.2]	0.2	\$675.00	\$135.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/20/2022	JLB	Analysis of issues re preparing reply to UST objection to GT employment application	0.2	\$575.00	\$115.00
9/20/2022	JSW	Strategize re preparing reply to UST opposition to GT employment application	0.2	\$395.00	\$79.00
9/22/2022	JSW	Draft reply to UST's objection to the Debtor's application to employ GT	1.5	\$395.00	\$592.50
9/23/2022	SKS	Revise reply to US Trustee's objection to application to employ Greenberg Traurig as membership counsel [.5]	0.5	\$675.00	\$337.50
10/10/2022	JSW	Draft Debtor's omnibus reservations of rights to object to the Committee's and Dundon's first interim fee applications	0.5	\$395.00	\$197.50
10/10/2022	JSW	Finalize Debtor's omnibus reservations of rights re Committee's and Dundon's first interim fee applications	0.1	\$395.00	\$39.50
Subtotal [135] Fee/Employment Objections			3.4		\$1,575.00

[140] Financing

9/12/2022	SKS	Conversations (multiple) with Tanner James regarding budget and related issues [.5]	0.5	\$675.00	\$337.50
9/14/2022	SKS	Conversations (multiple) with Tanner James regarding revisions to budget [.4]	0.4	\$675.00	\$270.00
9/14/2022	SKS	Conversation with Paul Huygens regarding budget and excess spending [.3]	0.3	\$675.00	\$202.50
9/15/2022	STG	Analyse issues re: fees and budget.	0.5	\$895.00	\$447.50
9/15/2022	SKS	Conversations (multiple) with Tanner James regarding revised budget [.4]	0.4	\$675.00	\$270.00
9/15/2022	SKS	Conversation with Paul Huygens regarding various issues relating to budget [.3]	0.3	\$675.00	\$202.50
10/5/2022	SKS	Conference call with Paul Huygens and Tanner James regarding budget and related issues [.5]	0.5	\$675.00	\$337.50
10/6/2022	SKS	Conversations (multiple) with Tanner James regarding professional fee budget requested by FS DIP [.3]	0.3	\$675.00	\$202.50
10/6/2022	STG	Review email from Schwartz on allocation of carevout in budget based on litigation issues forthcoming with LVDF.	0.1	\$895.00	\$89.50
10/7/2022	SKS	Conversations (multiple) with Paul Huygens regarding various issues related to budget and plan confirmation [.8]	0.8	\$675.00	\$540.00
10/7/2022	SKS	Review fee statement from FS DIP counsel and prepare correspondence to client regarding same [.2]	0.2	\$675.00	\$135.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/10/2022	SKS	Review August and September invoices from counsel for lender and prepare correspondence regarding same [.3]	0.3	\$675.00	\$202.50
10/12/2022	SKS	Review and comment on most recent budget [.9]	0.9	\$675.00	\$607.50
10/24/2022	SKS	Review most recent budget and analysis of issues regarding same [.7]	0.7	\$675.00	\$472.50
10/24/2022	SKS	Conversation with Paul Huygens regarding budget and related issues [.5]	0.5	\$675.00	\$337.50
12/1/2022	SKS	Conversations (multiple) with Tanner James regarding various issues related to confirmation order, funding etc [.4]	0.4	\$675.00	\$270.00
Subtotal [140] Financing			7.1		\$4,924.50
<u>[170] Plan & Disclosure Statement</u>					
9/1/2022	STG	Review of related documents and preparation of summary (1.0) and analyse issues re: amendment to Plan and disclosure statement [1.7]; Telephone conference with G. Garman re: proposed Westwind deal [.4]; Telephone conference with FA's re: same [.3]	2.4	\$895.00	\$2,148.00
9/1/2022	SKS	Further draft amended disclosure statement [2.3]	2.3	\$675.00	\$1,552.50
9/1/2022	SKS	Review and revise term sheet regarding plan terms with FS DIP [1.4]	1.4	\$675.00	\$945.00
9/1/2022	JSW	Draft motion to extend exclusivity periods	1.8	\$395.00	\$711.00
9/1/2022	SKS	Conversations (multiple) with Ignatius Piazza re term sheet with FS DIP re plan [.9]	0.9	\$675.00	\$607.50
9/1/2022	SKS	Revise term sheet with FS DIP regarding plan terms multiple times [.8]	0.8	\$675.00	\$540.00
9/1/2022	SKS	Conversations (multiple) with Paul Huygens regarding plan terms and related issues [.8]	0.8	\$675.00	\$540.00
9/1/2022	JSW	Further draft motion to extend exclusivity period	1.1	\$395.00	\$434.50
9/1/2022	SKS	Review emails (multiple) from Sam Schwartz regarding plan term sheet and prepare emails regarding same [.6]	0.6	\$675.00	\$405.00
9/1/2022	SKS	Conversation with Sam Schwartz regarding plan terms [.4]	0.4	\$675.00	\$270.00
9/1/2022	JSW	Draft declaration in support of motion to extend exclusivity period [.2]; draft proposed order re the same [.2]; draft notice of hearing on the same [.2]	0.6	\$395.00	\$237.00
9/1/2022	JLB	Strategy re seeking extension of exclusivity in light of status of negotiations.	0.3	\$575.00	\$172.50



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9/1/2022	JSW	Analysis of issues re need for motion to extend the exclusivity period	0.2	\$395.00	\$79.00
9/1/2022	SKS	Conversation with Greg Garman regarding potential plan deal [.1]	0.1	\$675.00	\$67.50
9/2/2022	STG	Review issues on ammendments to plan terms in light of various new proposals and analyse same.	2.2	\$895.00	\$1,969.00
9/2/2022	STG	Review issues on lender settlement proposal (.4); review of term sheet and analyse same (.4); multiple emails with client re: same (.3).	1.1	\$895.00	\$984.50
9/2/2022	SKS	Analysis of issues regarding further amended plan and disclosure statement per agreed upon terms with DIP lender [.8]	0.8	\$675.00	\$540.00
9/2/2022	SKS	Draft correspondence to Sam Schwartz regarding information needed for amended disclosure statement [.6]	0.6	\$675.00	\$405.00
9/2/2022	SKS	Conversation with Bob LeHane regarding plan terms agreed upon with DIP lender [.5]	0.5	\$675.00	\$337.50
9/2/2022	SKS	Conversation with Lauren Schlussel regarding plan term sheet with DIP lender [.4]	0.4	\$675.00	\$270.00
9/2/2022	SKS	Conversation with Ed McDonald regarding disclosure statement hearing [.3]	0.3	\$675.00	\$202.50
9/5/2022	SKS	Review correspondence from Sam Schwartz regarding information needed for amended disclosure statement and draft correspondence regarding same [.7]	0.7	\$675.00	\$472.50
9/6/2022	SKS	Draft amended disclosure statement based on term sheet with FS DIP affiliate [2.4]	2.4	\$675.00	\$1,620.00
9/6/2022	SKS	Research regarding acquisition of stock through plan confirmation process [1.5]	1.5	\$675.00	\$1,012.50
9/6/2022	SKS	Research regarding third party exculpations in plan and related issues [1.3]	1.3	\$675.00	\$877.50
9/6/2022	SKS	Prepare emails (multiple) to Sam Schwartz regarding information needed for plan and disclosure statement and review emails regarding same [.4]	0.4	\$675.00	\$270.00
9/7/2022	SKS	Further draft amended disclosure statement with updated details from investor [4.3]	4.3	\$675.00	\$2,902.50
9/7/2022	SKS	Further revise amended disclosure statement [.8]	0.8	\$675.00	\$540.00
9/7/2022	SKS	Conversations (multiple) with Paul Huygens regarding plan terms [.8]	0.8	\$675.00	\$540.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/7/2022	SKS	Conference call with Sam Schwartz and Paul Huygens regarding plan terms [.8]	0.8	\$675.00	\$540.00
9/7/2022	SKS	Conversation with Paul Huygens regarding comments on amended plan [.6]	0.6	\$675.00	\$405.00
9/8/2022	SKS	Conversations (multiple) with Sam Schwartz regarding plan terms [1.8]	1.8	\$675.00	\$1,215.00
9/8/2022	SKS	Revise first amended disclosure statement per comments from equity investor [1.6]	1.6	\$675.00	\$1,080.00
9/8/2022	SKS	Draft amended plan of reorganization [1.5]	1.5	\$675.00	\$1,012.50
9/8/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding plan terms and related issues [1.4]	1.4	\$675.00	\$945.00
9/8/2022	STG	Review Disclosure Statement and Plan.	1.0	\$895.00	\$895.00
9/8/2022	SKS	Review emails (multiple) from Sam Schwartz regarding comments on disclosure statement and plan and prepare correspondence regarding same [.8]	0.8	\$675.00	\$540.00
9/8/2022	SKS	Conversations (multiple) with Paul Huygens regarding plan terms [.6]	0.6	\$675.00	\$405.00
9/8/2022	SKS	Revise plan per client comments [.6]	0.6	\$675.00	\$405.00
9/8/2022	SKS	Review and revise claim chart exhibit for plan and disclosure statement [.5]	0.5	\$675.00	\$337.50
9/8/2022	SKS	Revise liquidation analysis [.4]	0.4	\$675.00	\$270.00
9/8/2022	SKS	Conversation with Adam Fialkowski from Stretto regarding various issues relating to balloting [.3]	0.3	\$675.00	\$202.50
9/8/2022	SKS	Draft ballot for general unsecured creditors [.2]	0.2	\$675.00	\$135.00
9/8/2022	SKS	Draft notice of hearing on first amended disclosure statement [.2]	0.2	\$675.00	\$135.00
9/9/2022	SKS	Draft motion to approve disclosure statement and related procedures [2.1]	2.1	\$675.00	\$1,417.50
9/9/2022	STG	Review new plan and disclosure statement and motion for same.	1.0	\$895.00	\$895.00
9/9/2022	SKS	Conversations (multiple) with Sam Schwartz regarding comments on plan [1.3]	1.3	\$675.00	\$877.50
9/9/2022	SKS	Draft plan confirmation notice [1.2]	1.2	\$675.00	\$810.00
9/9/2022	SKS	Revise member benefit exhibit to plan [.9]	0.9	\$675.00	\$607.50



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/9/2022	SKS	Revise disclosure statement [.8]	0.8	\$675.00	\$540.00
9/9/2022	SKS	Review emails (multiple) from Sam Schwartz regarding comments on plan and disclosure statement and prepare emails regarding same [.6]	0.6	\$675.00	\$405.00
9/9/2022	SKS	Conversations (multiple) with Stretto regarding quotes for various levels of service of solicitation package [.4]	0.4	\$675.00	\$270.00
9/9/2022	SKS	Revise claim chart exhibit to plan [.4]	0.4	\$675.00	\$270.00
9/9/2022	SKS	Further revise plan and disclosure statement re errors found [.2]; draft correspondence to Sam Schwartz regarding same [.1]	0.3	\$675.00	\$202.50
9/9/2022	SKS	Conversations (multiple) with Greg Garman regarding various plan issues [.3]	0.3	\$675.00	\$202.50
9/9/2022	SKS	Draft application for order shortening time on hearing on disclosure statement [.3]	0.3	\$675.00	\$202.50
9/9/2022	SKS	Draft notice of hearing on disclosure statement [.2]	0.2	\$675.00	\$135.00
9/9/2022	SKS	Draft notice of hearing on disclosure statement procedures motion [.1]	0.1	\$675.00	\$67.50
9/12/2022	STG	Review filed Plan and Disclosure Statement [1.2]; review order shortening time from the court[.1]	1.3	\$0.00	No Charge
9/13/2022	SKS	Review correspondence from committee counsel regarding questions relating to motion to approve disclosure statement [.1]; review debtor's records regarding members [.3]; draft responsive email [.7]	1.1	\$675.00	\$742.50
9/13/2022	SKS	Draft second amended disclosure statement based on additional information [.9]	0.9	\$675.00	\$607.50
9/14/2022	SKS	Conversation with Andrea Mendoza regarding September 23 hearing on disclosure statement being continued [.1]	0.1	\$675.00	\$67.50
9/15/2022	SKS	Review PrairieFire website about Front Sight plan [.3]; draft correspondence (multiple) to Sam Schwartz regarding removal of website [.5]; review emails regarding same [.2]	1.0	\$675.00	\$675.00
9/15/2022	SKS	Revise language for Prairie Fire response to inquiries from members related to plan [.8]	0.8	\$675.00	\$540.00
9/15/2022	SKS	Conversation with Ignatius Piazza regarding PrairieFire website about Front Sight plan [.4]	0.4	\$675.00	\$270.00
9/16/2022	JBK	Analyze document requests served by LVDF in connection with the disclosure statement.	1.0	\$675.00	\$675.00
9/16/2022	STG	Call with counsel for the Official Committee of Unsecured Creditors re Disclosure Statement.	0.4	\$895.00	\$358.00



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9/16/2022	SKS	Conversation with Candace Carlyon re various questions about plan [.2]	0.2	\$675.00	\$135.00
9/17/2022	SKS	Reivew subpoenas issued to new equity investor from LVDF allegedly related to disclosure statement and review correspondence from Sam Newman regarding same [.3]; prepare emails to Sam Newman regarding same [.2]	0.5	\$675.00	\$337.50
9/17/2022	SKS	Review LVDF request for production of documents allegedly in connection with the Debtor's disclosure statement [.3]; prepare emails (multiple) to client regarding same [.2]	0.5	\$675.00	\$337.50
9/17/2022	SKS	Review LVDF supboena to debtor allegedly related to disclosure statement [.2]; prepare correspondence to client regarding same [.1]	0.3	\$675.00	\$202.50
9/17/2022	JLB	Correspondence with Brian Shapiro and litigation team re discovery pertaining to disclosure statement	0.3	\$575.00	\$172.50
9/19/2022	STG	Meeting/Call RE: Motion to Quash [.5]; review discovery issued by LVDF [.3]; Telephone conference with G. Garman [.5]; Telephone conference with Lehane [.1]; review pending meet and confer status [.3]; analyse deadlines on DS Objections and analyse issues re: contested matters for discovery related thereto [.5]	2.2	\$895.00	\$1,969.00
9/19/2022	JLB	Analysis of issues re strategy in preparing meet and confer letter re discovery requests from LVDF in connection with plan and disclosure statement	1.0	\$575.00	\$575.00
9/19/2022	SKS	Conference call with Paul Huygens and Tanner James regarding tax issues relating to plan confirmation [.8]	0.8	\$675.00	\$540.00
9/19/2022	SKS	Further review discovery served by LVDF in connection with disclosure statement and prepare notes regarding response [.8]	0.8	\$675.00	\$540.00
9/19/2022	SKS	Prepare correspondence (multiple) to Sam Schwartz regarding request for corporate documents in connection with plan and review emails (multiple) regarding same [.8]	0.8	\$675.00	\$540.00
9/19/2022	SKS	Research regarding confirmation and disclosure statement as a contested matter [.7]	0.7	\$675.00	\$472.50
9/19/2022	SKS	Conversation with Sam Schwartz regarding various plan issues [.5]	0.5	\$675.00	\$337.50
9/19/2022	JLB	Research scope of standing to begin contested matter in connection with plan confirmation, related to potential response to LVDF discovery	0.4	\$575.00	\$230.00
9/19/2022	SKS	Conversation with Ignatius Piazza regarding various plan issues [.2]	0.2	\$675.00	\$135.00
9/19/2022	JLB	Review subpoeans issues to FS DIP and Nevada PF from LVDF	0.2	\$575.00	\$115.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/19/2022	JLB	Review RFPs from LVDF re plan	0.2	\$575.00	\$115.00
9/20/2022	STG	Conference Call with Lehane re: DS issues [.5]; analyse DS with S. Sefflin re: outstanding issues on DS [.4]; emails from client (3x) on further disclosures re: tax disclosures [.3]	1.2	\$895.00	\$1,074.00
9/20/2022	SKS	Conversation with Paul Huygens regarding various issues related to tax implications of the plan [.8]	0.8	\$675.00	\$540.00
9/20/2022	SKS	Review 2016 to 2021 tax returns and draft correspondence to Nevada PF counsel in connection with plan documents [.7]	0.7	\$675.00	\$472.50
9/20/2022	SKS	Conversation with Lauren Schlusssel regarding committee issues with disclosure statement [.6]	0.6	\$675.00	\$405.00
9/20/2022	SKS	Conversation with Ed McDonald regarding UST comments on disclosure statement [.5]	0.5	\$675.00	\$337.50
9/20/2022	SKS	Conversation with Sam Schwartz regarding tax issues relating to plan [.5]	0.5	\$675.00	\$337.50
9/20/2022	SKS	Review correspondence from committee counsel regarding disclosure statement concerns [.3]	0.3	\$675.00	\$202.50
9/20/2022	SKS	Prepare correspondence to Stretto regarding request for quote for additional solicitation per committee request and review correspondence regarding same [.2]	0.2	\$675.00	\$135.00
9/21/2022	JBK	Revise discovery letter to LVDF.	0.7	\$675.00	\$472.50
9/21/2022	JLB	Draft letter to LVDF re discovery served in connection with plan and disclosure statement	0.5	\$575.00	\$287.50
9/21/2022	SKS	Conversation with Sam Schwartz regarding solicitation and related matters [.2]	0.2	\$675.00	\$135.00
9/22/2022	SKS	Begin drafting second amended disclosure statement per changes and comments [.8]	0.8	\$675.00	\$540.00
9/23/2022	JBK	Analyze objections to disclosure statement in connection with responding to LVDF discovery.	1.2	\$675.00	\$810.00
9/23/2022	SKS	Review committee objection to disclosure statement [.3]; analysis of issues regarding same [.3]; conversation with Paul Huygens regarding same [.2]	0.8	\$675.00	\$540.00
9/23/2022	SKS	Draft correspondence to committee counsel in response to comments on disclosure statement [.7]	0.7	\$675.00	\$472.50
9/23/2022	SKS	Review UST objection to disclosure statement [.2]; draft correspondence to Ed McDonald regarding same [.3]	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>
9/23/2022	SKS	Review Committee objection to disclosure statement [.2]; prepare correspondence to client regarding same [.1]	0.3	\$675.00	\$202.50
9/23/2022	SKS	Conversation with Sam Schwartz regarding revision to plan and disclosure statement regarding LVDF treatment [.3]	0.3	\$675.00	\$202.50
9/23/2022	SKS	Draft correspondence to Brian Shapiro regarding LVDF objection to disclosure statement [.3]	0.3	\$675.00	\$202.50
9/23/2022	SKS	Conversation with Paul Huygens regarding UST objection to disclosure statement [.2]	0.2	\$675.00	\$135.00
9/23/2022	SKS	Review emails from Sam Schwartz and Brian Shapiro regarding change of treatment of LVDF's claim and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
9/23/2022	JSW	Analysis of UST's objection to Debtor's first amended disclosure statement	0.3	\$395.00	\$118.50
9/23/2022	JLB	Respond to emails from Brian Shapoiro re plan and disclosure statement discovery	0.2	\$575.00	\$115.00
9/24/2022	STG	Review confidential offering documents attached as exhibits to LVDF's objection to disclosure statement (280) pages submitted confidential to try to figure out why unsigned drafts would ever be confidential for a loan program that no longer exists [3.3]; email to counsel regarding the same question [.1]	3.4	\$895.00	\$3,043.00
9/24/2022	STG	Review and further analyse Opposition to disclosure statement by the Official Committee of Unsecured Creditors [.4]; Telephone conference with P. Huygens regarding issues and analysis of DS and pending Objections [.5]; Telephone conference with S. Sefflin re: issues on DS [.2]	1.1	\$895.00	\$984.50
9/26/2022	SKS	Review objections to disclosure statement and prepare outline [1.8]	1.8	\$675.00	\$1,215.00
9/26/2022	SKS	Draft second amended disclosure statement per objections [1.7]	1.7	\$675.00	\$1,147.50
9/26/2022	JBK	Prepare for and meet and confer with counsel for LVDF relating to discovery and LVDF's objection to the disclosure statement.	1.5	\$675.00	\$1,012.50
9/26/2022	SKS	Conversations (multiple) with Paul Huygens regarding objections to disclosure statement [1.1]	1.1	\$675.00	\$742.50
9/26/2022	SKS	Conference call with committee counsel, Paul Huygens and Greg Garman regarding plan and disclosure statement negotiations [.7]	0.7	\$675.00	\$472.50
9/26/2022	JLB	Conference call with LVDF counsel re discovery and attempts to resolve same in connection with plan and disclosure statement	0.6	\$575.00	\$345.00
9/26/2022	JLB	Preparation for discovery call with LVDF counsel	0.6	\$575.00	\$345.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/26/2022	SKS	Conference call with Paul Huygens and Tanner James regarding issues related to plan [.5]	0.5	\$675.00	\$337.50
9/26/2022	JLB	Analysis of disclosure statement objections by committee and LVDF as it relates to responding to LVDF discovery demands	0.5	\$575.00	\$287.50
9/26/2022	JSW	Strategize re preparing replies to several objections to Debtor's First Amended Disclosure Statement	0.6	\$395.00	\$237.00
9/26/2022	JLB	Follow up analysis of documents requested by LVDF relating to plan and disclosure statement process	0.3	\$575.00	\$172.50
9/26/2022	JSW	Analysis of LVDF's objection to Debtor's First Amended Disclosure Statement	0.3	\$395.00	\$118.50
9/26/2022	JSW	Analysis of Committee's objection to Debtor's First Amended Disclosure Statement	0.3	\$395.00	\$118.50
9/26/2022	JSW	Analysis of Meacher's objection to Debtor's First Amended Disclosure Statement	0.2	\$395.00	\$79.00
9/26/2022	JLB	Follow up email to Brian Shapiro re LVDF discovery meet and confer	0.1	\$575.00	\$57.50
9/27/2022	SKS	Draft omnibus reply to objections to disclosure statement [4.3]	4.3	\$675.00	\$2,902.50
9/27/2022	SKS	Conversations (multiple) with Sam Schwartz regarding reply to objections to disclosure statement [1.4]	1.4	\$675.00	\$945.00
9/27/2022	SKS	Conversations (multiple) with Paul Huygens regarding information needed for reply to disclosure statement objections [1.2]	1.2	\$675.00	\$810.00
9/27/2022	SKS	Further revise reply to disclosure statement objections per client comments [.6]	0.6	\$675.00	\$405.00
9/27/2022	STG	Review multiple versions of draft reply to objections to disclosure statement.	0.4	\$895.00	\$358.00
9/27/2022	JLB	Revise omnibus reply re disclosure statement objections	0.5	\$575.00	\$287.50
9/27/2022	SKS	Conversation with Ignatius Piazza regarding information needed for reply to disclosure statement objections [.4]	0.4	\$675.00	\$270.00
9/27/2022	JSW	Analysis of issues re discovery served by LVDF in connection with objection to Debtor's disclosure statement and anticipated objection to Debtor's plan	0.3	\$395.00	\$118.50
9/27/2022	JLB	Analysis of issues re LVDF standing to object to issues in disclosure statement, relating to preparing reply	0.2	\$575.00	\$115.00
9/27/2022	JLB	Brief call with Brian Shapiro re discovery related to LVDF objection to disclosure statement	0.1	\$575.00	\$57.50



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/28/2022	STG	Multiple calls with FA and counsel for client on issues surrounding Objections to DS.	1.4	\$895.00	\$1,253.00
9/28/2022	SKS	Review tax and corporate documents and draft correspondence to Sam Schwartz regarding requests related thereto [1.5]	1.5	\$675.00	\$1,012.50
9/28/2022	SKS	Conversations (multiple) with Paul Huygens regarding various issues relating to plan [1.1]	1.1	\$675.00	\$742.50
9/28/2022	SKS	Review correspondence (multiple) from Sam Schwartz regarding various document requests relating to plan and prepare emails (multiple) regarding same [.7]	0.7	\$675.00	\$472.50
9/28/2022	SKS	Conference call with Greg Garman, Paul Huygens and Steve Gubner regarding various disclosure statement issues [.5]	0.5	\$675.00	\$337.50
9/28/2022	SKS	Conversation with Ignatius Piazza regarding plan and disclosure statement [.5]	0.5	\$675.00	\$337.50
9/28/2022	SKS	Conference call with Greg Garman, Steve Gubner etc regarding issues with reply to disclosure statement objections [.4]	0.4	\$675.00	\$270.00
9/28/2022	JLB	Respond to email from Brian Shapiro re LVDF discovery related to plan	0.1	\$575.00	\$57.50
9/28/2022	STG	Further review of all 4 oppositions to DS in reparation of upcoming hearings.	4.4	\$0.00	No Charge
9/29/2022	STG	Multiple calls with Garman, Huygens Lehane, Seflin re: DS statement hearing re: settlement of claims [1.9].	1.9	\$895.00	\$1,700.50
9/29/2022	SKS	Draft order on disclosure statement [2.5]	2.5	\$675.00	\$1,687.50
9/29/2022	SKS	Review documents in preparation for disclosure statement hearing [1.0]	1.0	\$675.00	\$675.00
9/29/2022	SKS	Conversations (multiple) with Paul Huygens regarding plan negotiations [.8]	0.8	\$675.00	\$540.00
9/29/2022	SKS	Conference call with Paul Huygens, Greg Garman and Steve Gubner regarding status of plan negotiations [.7]	0.7	\$675.00	\$472.50
9/29/2022	SKS	Conversations (multiple) with Lauren Schlusel regarding status of committee plan negotiations with insiders and PrairieFire [.6]	0.6	\$675.00	\$405.00
9/29/2022	SKS	Conversation with Greg Garman regarding plan negotiations with committee counsel [.4]	0.4	\$675.00	\$270.00
9/29/2022	JLB	Conference call with Brian Shapiro re disclosure statement discovery from LVDF	0.4	\$575.00	\$230.00
9/29/2022	JLB	Strategize re responding to LVDF informal document requests	0.2	\$575.00	\$115.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/29/2022	JLB	Respond to email from Brian Shapiro re disclosure statement discovery LVDF	0.1	\$575.00	\$57.50
9/30/2022	STG	Prepared for DS hearing and further review of DS and reply and Oppositions by UCC, LVDF, Meacher and OUST [1.0]; attend hearing on DS [2.5].	3.5	\$895.00	\$3,132.50
9/30/2022	SKS	Appear at disclosure statement hearing [2.5]	2.5	\$675.00	\$1,687.50
9/30/2022	SKS	Prepare for disclosure statement hearing [1.7]	1.7	\$675.00	\$1,147.50
9/30/2022	SKS	Further revise disclosure statement order based on hearing [1.3]; draft correspondence to counsel who appeared regarding same [.2]	1.5	\$675.00	\$1,012.50
9/30/2022	SKS	Conversations (multiple) with Stretto regarding various issues relating to solicitation and voting [1.2]	1.2	\$675.00	\$810.00
9/30/2022	SKS	Continue drafting order on disclosure statement [.8]	0.8	\$675.00	\$540.00
10/1/2022	SKS	Draft modified disclosure statement and review documents regarding same [4.4]	4.4	\$675.00	\$2,970.00
10/1/2022	STG	Analysis of multiple emails and attachments of drafts proposed of DIP Order and modifications (.3); Review multiple versions of Order and further changes proposed by DIP and creditors (.3); modifications to documents (1.4) and recirculate modified version w/comments thereof (.30)	2.3	\$895.00	\$2,058.50
10/1/2022	SKS	Review emails (multiple) from opposing counsel regarding comments on disclosure statement order and draft correspondence regarding same [.7]	0.7	\$675.00	\$472.50
10/1/2022	SKS	Conversation with Paul Huygens regarding changes to disclosure statement [.2]	0.2	\$675.00	\$135.00
10/2/2022	STG	Review multiple emails requests re: revisions to DS to complete the procedures motion (.6) respond to email requests re DS revisions (.6); and amend DS prior to Monday Hearing (1.1).	2.3	\$895.00	\$2,058.50
10/2/2022	SKS	Further revise modified disclosure statement per comments received from various parties [2.3]	2.3	\$675.00	\$1,552.50
10/2/2022	SKS	Further draft amended disclosure statement per additional comments received [1.9]; draft Sefflin declaration to submit redline of disclosure statement [.1]; prepare correspondence to counsel regarding same [.1]	2.1	\$675.00	\$1,417.50
10/2/2022	SKS	Further revise proposed disclosure statement order per opposing counsel comments and add in bid language [1.7]	1.7	\$675.00	\$1,147.50
10/2/2022	SKS	Review emails (multiple) from Sam Schwartz regarding comments on disclosure statement and prepare correspondence regarding same [.8]	0.8	\$675.00	\$540.00



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10/2/2022	SKS	Conversation with Lauren Schlusel regarding disclosure statement comments and solicitation issues [.8]	0.8	\$675.00	\$540.00
10/2/2022	SKS	Further draft modified disclosure statement [.6]	0.6	\$675.00	\$405.00
10/2/2022	JLB	Multiple correspondence with Piazza and LVDF counsel regarding informal discovery requests by LVDF on plan documents	0.3	\$575.00	\$172.50
10/3/2022	STG	Telephone conference with S. Seflin [.4]; review disclosure statement and various versions with modifications in relation to upcoming hearing [1.8]	2.2	\$895.00	\$1,969.00
10/3/2022	SKS	Draft second amended plan [1.8]	1.8	\$675.00	\$1,215.00
10/3/2022	STG	Prepare for DS hearing and review of documents and Attend continued Disclosure Statement hearing approval.	1.1	\$895.00	\$984.50
10/3/2022	SKS	Draft notice of rejection of memberships and bar date for voting [1.4]	1.4	\$675.00	\$945.00
10/3/2022	SKS	Further revise second amended disclosure statement [1.1]	1.1	\$675.00	\$742.50
10/3/2022	SKS	Appear at continued hearing on motion to approve disclosure statement procedures [1.0]	1.0	\$675.00	\$675.00
10/3/2022	SKS	Prepare for continued hearing on motion to approve disclosure statement procedures [.9]	0.9	\$675.00	\$607.50
10/3/2022	SKS	Revise notice of plan confirmation multiple times [.9]	0.9	\$675.00	\$607.50
10/3/2022	SKS	Review emails (multiple) from Stretto regarding solicitation and review documents and prepare emails regarding same [.8]	0.8	\$675.00	\$540.00
10/3/2022	SKS	Conversations (multiple) with Tanner James regarding updated information for disclosure statement [.7]	0.7	\$675.00	\$472.50
10/3/2022	SKS	Conversations (multiple) with Adam Fialkowski regarding various issues relating to solicitation package [.6]	0.6	\$675.00	\$405.00
10/3/2022	SKS	Prepare correspondence (multiple) to counsel for new equity investor regarding information needed for plan and disclosure statement and review emails regarding same [.4]	0.4	\$675.00	\$270.00
10/3/2022	SKS	Revise disclosure statement order per court ruling [.1]; prepare correspondence to opposing counsel and review emails regarding same [.2]; prepare email to clerk regarding same [.1]	0.4	\$675.00	\$270.00
10/3/2022	SKS	Conversations (multiple) with Paul Huygens regarding information needed for plan [.4]	0.4	\$675.00	\$270.00
10/3/2022	SKS	Prepare ballots for all classes [.3]	0.3	\$675.00	\$202.50



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10/3/2022	SKS	Conversation with client regarding plan and disclosure statement [.2]	0.2	\$675.00	\$135.00
10/4/2022	STG	Review multiple changes to DS and final version of DS and Motion including review and further respond to multiple emails by all parties approving the same [2.2]; Telephone conference with G. Garmen [.3]	2.5	\$895.00	\$2,237.50
10/4/2022	SKS	Review emails (multiple) from Stretto regarding solicitation and prepare emails (multiple) regarding same [1.1]	1.1	\$675.00	\$742.50
10/4/2022	SKS	Conversations (multiple) with Adam Fialkowski regarding various issues regarding solicitation [.6]	0.6	\$675.00	\$405.00
10/4/2022	SKS	Conversations (multiple) with Athanasios regarding solicitation issues [.3]	0.3	\$675.00	\$202.50
10/4/2022	JLB	Review Piazza production re LVDF discovery requests	0.3	\$575.00	\$172.50
10/4/2022	SKS	Conversation with Greg Garman regarding plan treatment of LVDF and related issues [.2]	0.2	\$675.00	\$135.00
10/4/2022	JLB	Respond to email from Piazza counsel re LVDF discovery requests	0.1	\$575.00	\$57.50
10/5/2022	SKS	Review emails (multiple) from Stretto regarding solicitation issues and prepare emails (multiple) regarding same [.9]; prepare correspondence to client regarding requests relating to solicitation [.3]	1.2	\$675.00	\$810.00
10/5/2022	SKS	Conversations (multiple) with Adam Fialkowski regarding solicitation and various issues [.6]	0.6	\$675.00	\$405.00
10/5/2022	SKS	Review correspondence from multiple creditors regarding requests for claims and ballots and prepare correspondence regarding same [.5]	0.5	\$675.00	\$337.50
10/5/2022	SKS	Conversations (multiple) with counsel for DIP lender regarding solicitation issues [.3]	0.3	\$675.00	\$202.50
10/5/2022	SKS	Conversation with Scott Sindelar regarding request for ballot and respond to his other questions [.2]	0.2	\$675.00	\$135.00
10/6/2022	SKS	Conversation with member John Schafer regarding treatment of members, voting, etc [.5]; prepare correspondence to Sam Schwartz regarding same [.1]; review emails (multiple) from John Schafer regarding same [.2]	0.8	\$675.00	\$540.00
10/6/2022	SKS	Conversation with Steve O'Neill regarding plan, voting and other issues [.5]	0.5	\$675.00	\$337.50
10/6/2022	SKS	Conversations (multiple) with Adam Fialkowski regarding solicitation issues [.5]	0.5	\$675.00	\$337.50



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10/6/2022	JLB	Review mutiple emails from Brian Shapiro re LVDF discovery and mediation related to plan	0.2	\$575.00	\$115.00
10/6/2022	JLB	Prepare responsive email to Brian Shapiro re LVDF plan issues	0.1	\$575.00	\$57.50
10/7/2022	SKS	Review emails (multiple) from various members requesting additional information about the plan and Prairie Fire and prepare responses [1.3]	1.3	\$675.00	\$877.50
10/7/2022	SKS	Review emails (multiple) from Robert Thomas regarding plan and disclosure statement and requests for documents and information and prepare emails (multiple) regarding same [.7]; prepare email to R. Thomas regarding claim [.1]	0.8	\$675.00	\$540.00
10/7/2022	SKS	Conversations (multiple) with Stretto regarding various voting issues [.6]	0.6	\$675.00	\$405.00
10/10/2022	SKS	Review emails (multiple) from Martin Moss regarding plan, balloting and related issues and review documents regarding membership and draft multiple responses [1.1]	1.1	\$675.00	\$742.50
10/10/2022	SKS	Conversation with Greg Garman regarding potential resolution with LVDF regarding amount held in reserve under plan [.2]	0.2	\$675.00	\$135.00
10/10/2022	JLB	Analysis of issues re reserve amount discussions related to potential settlement with LVDF	0.2	\$575.00	\$115.00
10/10/2022	JLB	Multiple correspondence with Piazza counsel re LVDF discovery on plan and disclosure statement	0.2	\$575.00	\$115.00
10/11/2022	SKS	Review emails (multiple) from members regarding questions about plan and voting and prepare emails (multiple) regarding same [.9]	0.9	\$675.00	\$607.50
10/11/2022	SKS	Review emails from Stretto regarding solicitation issues and prepare emails regarding same [.4]	0.4	\$675.00	\$270.00
10/11/2022	SKS	Review correspondence from Darren Enns regarding questions about plan and related issues and draft response [.4]	0.4	\$675.00	\$270.00
10/12/2022	SKS	Analysis of issues regarding plan confirmation and additional evidence to submit [1.2]	1.2	\$675.00	\$810.00
10/12/2022	JSW	Draft Debtor's motion to confirm Second Amended Plan	2.0	\$395.00	\$790.00
10/12/2022	JSW	Analysis of issues re preparing Debtor's brief in support of confirmation of its Second Amended Chapter 11 Plan	0.2	\$395.00	\$79.00
10/13/2022	SKS	Review emails (multiple) from Sam Schwartz regarding request for additional documents related to equity investment and prepare emails regarding same [.9]	0.9	\$675.00	\$607.50
10/13/2022	JSW	Further draft motion to confirm Debtor's Second Amended Plan	1.5	\$395.00	\$592.50



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10/13/2022	JSW	Draft motion for confirmation of Second Amended Plan	0.9	\$395.00	\$355.50
10/14/2022	SKS	Review correspondence and documents from Stretto regarding various solicitation issues and analysis of issues regarding same [1.9]; prepare correspondence regarding same [.3]	2.2	\$675.00	\$1,485.00
10/14/2022	SKS	Review emails (multiple) from various creditors regarding questions about the plan confirmation notice and rejection notice and prepare correspondence regarding same [1.4]	1.4	\$675.00	\$945.00
10/14/2022	SKS	Review correspondence and document request from committee counsel allegedly relating to plan confirmation [.2]; prepare correspondence to client regarding same [.1]; analysis of issues regarding same [.2]	0.5	\$675.00	\$337.50
10/14/2022	SKS	Conversation with Paul Huygens regarding various issues relating to plan supplement [.2]	0.2	\$675.00	\$135.00
10/14/2022	JT	Call with member Dr. Robert Hulbert, email to S. Seflin re voting on the plan and related bar dates, review and respond to Dr. Hulbert's email re voting and filing claim	0.3	\$270.00	\$81.00
10/15/2022	SKS	Review correspondence from Charles Coln regarding plan confirmation notice and new membership with reorganized debtor and prepare correspondence regarding same [.3]	0.3	\$675.00	\$202.50
10/16/2022	SKS	Review emails (multiple) from Adam Fialkowski regarding voting inquiries of deployed military and prepare emails (multiple) regarding same [.4]; research regarding same [.6]	1.0	\$675.00	\$675.00
10/17/2022	JSW	Draft Debtor's motion for confirmation of its Second Amended Plan	2.6	\$395.00	\$1,027.00
10/17/2022	JSW	Further draft Debtor's motion for confirmation of the Second Amended Plan	2.3	\$395.00	\$908.50
10/17/2022	SKS	Review emails (multiple) from Adam Fialkowski regarding additional soliciting issues and prepare emails regarding same [.8]	0.8	\$675.00	\$540.00
10/17/2022	SKS	Review correspondence from Ken Darby regarding questions related to plan and voting and draft response [.7]	0.7	\$675.00	\$472.50
10/17/2022	SKS	Conversation with Paul Huygens regarding status of plan negotiations [.4]	0.4	\$675.00	\$270.00
10/17/2022	SKS	Review correspondence from Paul Huygens regarding status of plan negotiations and prepare correspondence regarding same [.3]	0.3	\$675.00	\$202.50
10/17/2022	JLB	Analysis of issues related to optional plan provisions in connection with confirmation brief	0.3	\$575.00	\$172.50



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10/17/2022	JSW	Analysis of issues re preparing Debtor's motion for confirmation of Second Amended Plan and arguments in support thereof	0.4	\$395.00	\$158.00
10/17/2022	SKS	Review correspondence from Kim Klein regarding request for ballot to vote and review list of members and prepare correspondence to Stretto regarding same [.2]	0.2	\$675.00	\$135.00
10/17/2022	JT	Call with Randall Bowling re membership, voting and claim inquiries, forward Rejection Notice by email	0.3	\$270.00	\$81.00
10/18/2022	STG	Review and analyze set of discovery demands from committee [1.1]; review multiple emails and demands regarding discovery from Official Committee of Unsecured Creditors and responses thereto [.4]; rewiw email from Schwartz re: potential resolution on Plan issues [.1]; Telephone conference with G. Garmen (mult) re: status of plan issues [.5]; Telephone conference with P. Huyens re: current status of funding and allocation under plan (mult) [.8].	2.9	\$895.00	\$2,595.50
10/18/2022	SKS	Review documents to be produced by FS DIP LLC in response to LVDF subpoena related to plan confirmation [.9]; draft correspondence to FS DIP counsel regarding various related issues and review correspondence regarding same [.3]	1.2	\$675.00	\$810.00
10/18/2022	JSW	Further draft Debtor's motion for confirmation of Debtor's Second Amended Plan	1.9	\$395.00	\$750.50
10/18/2022	JLB	Review documents related to FS DIP subpoena and potential need for motion to quash in light of same	1.0	\$575.00	\$575.00
10/18/2022	SKS	Conversation with Austin Sanders relating various issues about plan and voting [.6]	0.6	\$675.00	\$405.00
10/18/2022	JSW	Further draft Debtor's motion for confirmation of the Second Amended Plan	1.0	\$395.00	\$395.00
10/18/2022	SKS	Draft response to committee counsel in response to documents related to plan [.4]	0.4	\$675.00	\$270.00
10/18/2022	SKS	Conversation with Teresa Pilatowicz regarding committee document request related to the plan [.3]	0.3	\$675.00	\$202.50
10/18/2022	JSW	Draft Debtor's motion for confirmation of Second Amended Plan	0.4	\$395.00	\$158.00
10/18/2022	JT	Call with B. Sanders re membership and plan of reorganization	0.3	\$270.00	\$81.00
10/18/2022	JSW	Draft declaration of Piazza in support of Debtor's motion for confirmation of Debtor's Second Amended Plan	0.2	\$395.00	\$79.00
10/19/2022	SKS	Prepare response to Committee plan request regarding questions relating to balance sheet and review documents from client regarding same [1.3]	1.3	\$675.00	\$877.50



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/19/2022	SKS	Prepare response to Committee plan requests regarding Heritage and Platinum offers [1.1]	1.1	\$675.00	\$742.50
10/19/2022	SKS	Conference call with Tanner James and Ignatius Piazza regarding committee plan requests for information and documents [.6]	0.6	\$675.00	\$405.00
10/19/2022	JSW	Draft declaration of Piazza in support of Debtor's motion for confirmation of Second Amended Plan	0.9	\$395.00	\$355.50
10/19/2022	SKS	Review tax returns and account transcripts related to committee request for plan discovery [.3]; prepare correspondence to committee counsel regarding same [.2]	0.5	\$675.00	\$337.50
10/19/2022	SKS	Review correspondence from Kelly Griffin (multiple) regarding plan, voting, etc and prepare response [.4]	0.4	\$675.00	\$270.00
10/19/2022	SKS	Conversation with accountant Leslie Sobol regarding plan document requests from committee relating to debtor's balance sheet and tax returns [.4]	0.4	\$675.00	\$270.00
10/19/2022	JLB	Strategize on FS DIP subpoena and need for protective order and objections re subpoena issued by LVDF re disclosure statement	0.4	\$575.00	\$230.00
10/19/2022	SKS	Review correspondence from William Pecsí regarding plan, membership and related issues and prepare correspondence regarding same [.3]	0.3	\$675.00	\$202.50
10/19/2022	SKS	Review preliminary ballot tabulation report [.2]; prepare correspondence to client regarding same [.1]	0.3	\$675.00	\$202.50
10/19/2022	JLB	Analysis of Piazza objections to LVDF subpoena	0.3	\$575.00	\$172.50
10/19/2022	JLB	Analysis of multiple correspondence with committee counsel related to document requests	0.3	\$575.00	\$172.50
10/19/2022	JLB	Revise meet and confer letter to Brian Shapiro re LVDF pursuit of third party plan discovery	0.3	\$575.00	\$172.50
10/19/2022	SKS	Review correspondence (multiple) from Steve Goldfien regarding membership and plan and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
10/19/2022	JLB	Respond to email from Piazza counsel related to plan document production and objections to LVDF	0.1	\$575.00	\$57.50
10/19/2022	JT	Call with J. Smith re notice of plan confirmation and voting	0.2	\$270.00	\$54.00
10/19/2022	STG	Analysis of various documents (.5) and review gift card breakage spreadsheet related to Breakage (.6).	1.1	\$0.00	No Charge
10/20/2022	JBK	Review outstanding discovery and meet and confer with opposing counsel.	1.8	\$675.00	\$1,215.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/20/2022	SKS	Conference call with Sam Schwartz and Paul Huygens regarding issues related to plan supplement and tax elections under plan [.7]; conversation with Paul Huygens regarding same [.8]	1.5	\$675.00	\$1,012.50
10/20/2022	SKS	Review consulting agreement between Nevada PF and Ignatius Piazza for plan supplement [.3]; draft correspondence to Sam Schwartz and Greg Garman regarding consulting agreement, proposed share transfers under plan and other plan concerns [.9]	1.2	\$675.00	\$810.00
10/20/2022	SKS	Review emails and documents from Stretto regarding solicitation and voting and prepare emails (multiple) regarding same [1.1]	1.1	\$675.00	\$742.50
10/20/2022	JLB	Strategize re resolving pending FS DIP subpoena and overlapping debtor RFP from LVDF re plan confirmation	1.2	\$575.00	\$690.00
10/20/2022	SKS	Review non disclosure agreements between Front Sight and FS DIP related to LVDF plan discovery requests [.9]	0.9	\$675.00	\$607.50
10/20/2022	SKS	Conversations (multiple) with Paul Huygens regarding various plan issues [.9]	0.9	\$675.00	\$607.50
10/20/2022	SKS	Review correspondence (multiple) from Eric Bashaw regarding tax ramifications of plan and prepare correspondence (multiple) regarding same [.7]	0.7	\$675.00	\$472.50
10/20/2022	JLB	Prepare letter to Brian Shapiro re plan discovery dispute on LVDF matters	0.8	\$575.00	\$460.00
10/20/2022	SKS	Conference call with Paul Huygens and Greg Garman regarding plan supplement and related issues [.6]	0.6	\$675.00	\$405.00
10/20/2022	SKS	Conference call with Eric Bashaw and Paul Huygens regarding tax implications of plan [.6]	0.6	\$675.00	\$405.00
10/20/2022	SKS	Review emails (multiple) from Sam Schwartz regarding plan supplement and plan discovery requested by LVDF and prepare emails (multiple) regarding same [.6]	0.6	\$675.00	\$405.00
10/20/2022	JLB	Call with Brian Shapiro re meet and confer on plan discovery [.7]	0.7	\$575.00	\$402.50
10/20/2022	JLB	Preparation for meeting with Brian Shapiro on plan discovery issues re LVDF [.4]	0.4	\$575.00	\$230.00
10/20/2022	SKS	Review emails (multiple) from Gabriel Bilek regarding questions about plan and prepare emails (multiple) addressing same [.3]	0.3	\$675.00	\$202.50
10/20/2022	JLB	Analysis of issues re breakdown in consulting agreement discussions and potential impact on confirmation	0.3	\$575.00	\$172.50
10/20/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding various plan issues [.2]	0.2	\$675.00	\$135.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/20/2022	JLB	Multiple correspondence with FS DIP counsel re resolving LVDF subpoena re plan discovery	0.2	\$575.00	\$115.00
10/20/2022	JLB	Respond to email from Piazza counsel re discovery dispute with LVDF	0.1	\$575.00	\$57.50
10/20/2022	JSW	Review preliminary ballot results	0.1	\$395.00	\$39.50
10/20/2022	JSW	Analysis of LVDF's motion to estimate their claim for purposes of voting on the Debtor's second amended plan	0.1	\$395.00	\$39.50
10/21/2022	SKS	Revise motion to confirm plan [1.3]; revise Piazza declaration in support thereof [.3]	1.6	\$675.00	\$1,080.00
10/21/2022	SKS	Conference call with Paul Huygens and Sam Schwartz regarding various plan issues [.8]	0.8	\$675.00	\$540.00
10/21/2022	SKS	Conversation with Lauren Schluskel regarding various plan confirmation and claim issues [.7]	0.7	\$675.00	\$472.50
10/21/2022	JSW	Analysis of issues re preparing plan supplement [.1]; draft plan supplement [.3]; review consulting term sheet re the same [.1]	0.5	\$395.00	\$197.50
10/21/2022	SKS	Revise plan supplement [.1]; prepare correspondence to Sam Schwartz and Greg Garman regarding same [.1]	0.2	\$675.00	\$135.00
10/21/2022	SKS	Conversation with Teresa Pilatowicz regarding plan supplement [.2]	0.2	\$675.00	\$135.00
10/21/2022	JT	Call with O. Atherton re voting and ballot inquiry, review and respond to email forwarding rejection notice	0.4	\$270.00	\$108.00
10/21/2022	JSW	Draft notice of hearing on Debtor's motion for confirmation of Second Amended Plan	0.2	\$395.00	\$79.00
10/21/2022	JSW	Analysis of issues re finalizing Debtor's motion for confirmation of the Second Amended Plan	0.1	\$395.00	\$39.50
10/24/2022	STG	Review set of plan discovery demands from LVDF.	0.5	\$895.00	\$447.50
10/25/2022	STG	Review email from Pilatowicz and UCC demand for 5 years returns [.3]; Telephone conference with Garman (mult) [.4]	0.7	\$895.00	\$626.50
10/25/2022	SKS	Conversation with Paul Huygens regarding responses to committee plan requests [.7]	0.7	\$675.00	\$472.50
10/25/2022	STG	Analyze issues re: employee retention and need for onsite meeting with equity investor.	0.4	\$895.00	\$358.00
10/25/2022	SKS	Review emails from Melinda Doult regarding questions about voting and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/26/2022	SKS	Review correspondence and documents from client regarding committee document request in connection with plan discovery [2.1]; prepare emails to client regarding same [.4]	2.5	\$675.00	\$1,687.50
10/26/2022	SKS	Conference call with Sam Schwartz, Christina Ja, Paul Huygens, Ben Damsky, etc. regarding open issues relating to transition of business under plan [1.0]	1.0	\$675.00	\$675.00
10/26/2022	JT	Initial review of emails from client responsive to Committee's request, call with S. Sefflin re same (.3); prepare native emails for counsel review (.8); prepare and import email files to Nextpoint for review and production to committee (.9)	2.0	\$270.00	\$540.00
10/26/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding responses to committee plan requests [.8]	0.8	\$675.00	\$540.00
10/26/2022	SKS	Conversations (multiple) with Dr. Piazza's counsel regarding document production to committee related to the plan [.6]	0.6	\$675.00	\$405.00
10/26/2022	SKS	Review current ballot tally [.2]	0.2	\$675.00	\$135.00
10/27/2022	SKS	Conference call with Leslie Sobol, Paul Huygens, Eric Bashaw, Greg Garman et al regarding various tax issues related to plan confirmation [2.0]	2.0	\$675.00	\$1,350.00
10/27/2022	SKS	Review documents and emails related to response to committee counsel for plan discovery [1.9]	1.9	\$675.00	\$1,282.50
10/27/2022	JT	Initial review of additional emails from client re response to committee counsel for plan discovery	2.2	\$270.00	\$594.00
10/28/2022	SKS	Further review correspondence between Ignatius Piazza and various members per committee request in connection with plan confirmation [1.4]; review emails (multiple) from Ignatius Piazza regarding same and prepare emails regarding same [.5]	1.9	\$675.00	\$1,282.50
10/28/2022	JT	Prepare email files for import to Nextpoint for review and production re response to committee counsel for plan discovery	1.0	\$270.00	\$270.00
10/28/2022	SKS	Revise second plan supplement regarding notice of assumption of certain executory contracts and unexpired leases [.3]; review correspondence from Sam Schwartz regarding same and prepare correspondence regarding same [.1]	0.4	\$675.00	\$270.00
10/28/2022	JT	Review and prepare client emails for transfer to counsel, email to T. Pilatowicz forwarding email files for review re response to committee counsel for plan	0.8	\$270.00	\$216.00
10/28/2022	SKS	Review correspondence from Ronald Stevens regarding plan and voting and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
10/29/2022	SKS	Review email from Grant Janssen regarding voting and related issues and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/29/2022	SKS	Review correspondence from Bob LeHane regarding status of plan settlement and prepare correspondence to client regarding same [.2]	0.2	\$675.00	\$135.00
10/29/2022	SKS	Exchange emails with Adam Fialkowski regarding various solicitation and voting issues [.2]	0.2	\$675.00	\$135.00
10/31/2022	SKS	Review correspondence from committee counsel regarding request for information relating to mineral rights - purportedly in connection with committee review of plan [.1]; draft correspondence (multiple) to client regarding same [.2]; review documents regarding same [.4];	0.7	\$675.00	\$472.50
10/31/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding various issues relating to plan confirmation [.6]	0.6	\$675.00	\$405.00
10/31/2022	SKS	Conversation with James Harriss regarding plan and related issues [.4]	0.4	\$675.00	\$270.00
10/31/2022	JLB	Analysis of outstanding disputes related to upcoming plan confirmation hearing	0.3	\$575.00	\$172.50
10/31/2022	SKS	Review Committee notice of deposition of Ignatius Piazza regarding plan confirmation [.1]; prepare correspondence to client regarding same [.1]	0.2	\$675.00	\$135.00
10/31/2022	SKS	Review correspondence from Eric Moore regarding plan and voting [.1]; prepare response [.1]	0.2	\$675.00	\$135.00
10/31/2022	JLB	Analysis of issues re lack of response from Brian Shapiro re plan discovery related to LVDF	0.2	\$575.00	\$115.00
10/31/2022	JT	Call with S. Jorgenson re memberships of multiple family members and plan status	0.2	\$270.00	\$54.00
10/31/2022	JT	Review voicemail from Dr. Radermacher re membership interest and voting on plan, call with member	0.2	\$270.00	\$54.00
11/1/2022	STG	Prepare and review of documents for meeting Tanner and Huygen [1.0] and meet with Tanner and Meeting w Huygens re: status of Confirmation, voting tabulation and the complete lack of substance by the OCUC and the positions take by their counsel [1.2].	2.2	\$895.00	\$1,969.00
11/1/2022	SKS	Further review emails to be produced per committee plan request [.8]; prepare correspondence to client regarding same and review correspondence regarding same [.3]	1.1	\$675.00	\$742.50
11/1/2022	SKS	Conversations (multiple) with Dr. Piazza regarding various plan related issues [.8]	0.8	\$675.00	\$540.00
11/1/2022	SKS	Revise stipulation between debtor, LVDF, Nevada PF and insiders resolving disputes related to LVDF treatment in plan [.6]; conversation with Teresa Pilatowicz regarding same [.2]	0.8	\$675.00	\$540.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/1/2022	SKS	Conference call with Guy Bowers and Cristine Escalona regarding plan and terms of new memberships etc [.7]	0.7	\$675.00	\$472.50
11/1/2022	STG	Review multiple emails from Ignatius and S. Seflin re: meeting equity investor at sight with employee and sight inspection [.3]; emails confirming my attendance at meeting, open issues re same and response thereto [.2]	0.5	\$895.00	\$447.50
11/1/2022	JT	Review and analysis of individual emails with J. Bagdanov and S. Seflin in response to committee's request, further review of emails for transfer[1.5]	1.5	\$270.00	\$405.00
11/1/2022	JLB	Privilege review of documents for production to committee re plan discovery	0.4	\$575.00	\$230.00
11/1/2022	JT	Prepare email files for transfer to committee's counsel in response to request	0.8	\$270.00	\$216.00
11/1/2022	JLB	Analysis of issues re producing emails requested by committee in connection with plan confirmation	0.3	\$575.00	\$172.50
11/1/2022	SKS	Prepare correspondence to Lauren Schlusel regarding production of emails per committee plan request #11 [.1]	0.1	\$675.00	\$67.50
11/2/2022	SKS	Conversations (multiple) with Paul Huygens regarding various confirmation issues [1.2]	1.2	\$675.00	\$810.00
11/2/2022	SKS	Conversations (multiple) with Teresa Pilatowicz regarding stipulation with LVDF regarding plan [.9]	0.9	\$675.00	\$607.50
11/2/2022	SKS	Conversations (multiple) with Bryan Lindsey regarding various plan and transition issues [.9]	0.9	\$675.00	\$607.50
11/2/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding various confirmation issues [.8]	0.8	\$675.00	\$540.00
11/2/2022	SKS	Conversation with Peter Schmolze regarding plan and voting [.6]	0.6	\$675.00	\$405.00
11/2/2022	SKS	Conversation with Tanner James regarding various plan issues [.5]	0.5	\$675.00	\$337.50
11/2/2022	SKS	Review updated ballot tally [.2]	0.2	\$675.00	\$135.00
11/2/2022	JLB	Analysis of issues re scheduled mediation and impact on plan related deadlines	0.2	\$575.00	\$115.00
11/2/2022	JLB	Analysis of current version of stipulation re LVDF resolution for plan	0.2	\$575.00	\$115.00
11/2/2022	JT	Follow up re committee's request for correspondence, review S. Seflin's email forwarding first set of emails	0.3	\$270.00	\$81.00



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11/2/2022	SKS	Prepare correspondence to Stretto regarding ballot to Brian Shapiro to vote and prepare correspondence to Brian Shapiro regarding same [.1]	0.1	\$675.00	\$67.50
11/3/2022	STG	Review attachment for opposition by Official Committee of Unsecured Creditors [.2]; analyse issues re: Piazza [.3] deposition and review of documents in preparation of same [1.6]	2.1	\$895.00	\$1,879.50
11/3/2022	SKS	Conversations (multiple) with Paul Huygens regarding various confirmation issues [1.3]	1.3	\$675.00	\$877.50
11/3/2022	JLB	Analysis of issues raised in committee correspondence re plan dispute with Paul Huygens and Province	1.5	\$575.00	\$862.50
11/3/2022	SKS	Review ballot tally [.4]; prepare correspondence to Stretto regarding errors on claims [.7]	1.1	\$675.00	\$742.50
11/3/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding committee plan discovery and other confirmation issues [1.1]	1.1	\$675.00	\$742.50
11/3/2022	SKS	Conversation with Adam Fialkowski regarding ballot tally and errors [.7]	0.7	\$675.00	\$472.50
11/3/2022	SKS	Conversation with Spencer Kennedy regarding plan and related issues [.6]	0.6	\$675.00	\$405.00
11/3/2022	SKS	Review correspondence (multiple) from committee counsel regarding submission of debtor work product under seal in connection with plan confirmation objection and prepare correspondence (multiple) regarding same [.5]	0.5	\$675.00	\$337.50
11/3/2022	SKS	Review correspondence from Bob LeHane regarding objection to claim and review draft objection to confirmation [.4]	0.4	\$675.00	\$270.00
11/3/2022	SKS	Conversation with Michael Schmidt regarding plan and related issues [.3]	0.3	\$675.00	\$202.50
11/3/2022	SKS	Review LVDF plan stipulation and revise [.1]; prepare correspondence to Teresa Pilatowicz regarding same [.1]	0.2	\$675.00	\$135.00
11/3/2022	SKS	Conversation with Bryan Lindsey regarding plan supplement [.2]	0.2	\$675.00	\$135.00
11/3/2022	JLB	Analysis of additional revisions to stipulation re LVDF resolution on plan issues	0.2	\$575.00	\$115.00
11/4/2022	STG	Review emails from committe re: filing under seal and approving same [.3]; Telephone conference with Garman (mult) [.2]; review Ballot and votes analysis [1.1];	1.6	\$895.00	\$1,432.00
11/4/2022	SKS	Conversations (multiple) with Adam Fialkowski regarding various balloting and tabulation issues [.8]	0.8	\$675.00	\$540.00
11/4/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding plan issues [.7]	0.7	\$675.00	\$472.50



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11/4/2022	SKS	Conversations (multiple) with Paul Huygens regarding various plan issues [.6]	0.6	\$675.00	\$405.00
11/4/2022	SKS	Conversation with Jonathan Stahl regarding plan and related issues [.4]	0.4	\$675.00	\$270.00
11/4/2022	SKS	Review further updated ballot tally [.4]	0.4	\$675.00	\$270.00
11/4/2022	SKS	Review correspondence regarding continuance of deadline for committee to object to the plan and prepare correspondence regarding same [.2]; review stipulation [.1]	0.3	\$675.00	\$202.50
11/4/2022	JLB	Analysis of issues re problems with committee seal stipulation re objection to plan	0.3	\$575.00	\$172.50
11/4/2022	SKS	Review Meacher objection to plan confirmation [.2]	0.2	\$675.00	\$135.00
11/4/2022	SKS	Conversation with Ed McDonald regarding UST objections to plan confirmation [.2]	0.2	\$675.00	\$135.00
11/4/2022	SKS	Review emails from Brian Shapiro and Teresa Pilatowicz regarding LVDF estimation motion and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
11/4/2022	SKS	Review UST objection to plan confirmation [.2]	0.2	\$675.00	\$135.00
11/4/2022	SKS	Conversation with Tom Donaghy regarding plan and voting [.2]	0.2	\$675.00	\$135.00
11/4/2022	JSW	Review US Trustee's objection to confirmation of Debtor's Second Amended Plan	0.3	\$395.00	\$118.50
11/4/2022	JLB	Analysis of UST objection to plan confirmation	0.2	\$575.00	\$115.00
11/4/2022	JT	Call with G. Valdez re filing claim and voting on plan, review email from member, email to S. Sefflin re same	0.2	\$270.00	\$54.00
11/4/2022	JT	Call with P. Atwood re voting questions and claim filing questions	0.2	\$270.00	\$54.00
11/4/2022	JT	Call with J. Stahl re 10 memberships and plan status	0.1	\$270.00	\$27.00
11/5/2022	STG	Review Draft Objections by Official Committee of Unsecured Creditors [.60], prep of summary and analyze same [1.30].	1.9	\$895.00	\$1,700.50
11/5/2022	STG	Review multiple emails re: meetings on Sunday and Tuesday by PF [.5]; analyse issues with S. Sefflin, Huygens, and Garman re: confirmation [.8]	1.3	\$895.00	\$1,163.50
11/5/2022	STG	Review and analyze trustee objections to Plan and related documents thereto.	0.8	\$895.00	\$716.00



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11/7/2022	STG	Prepare for deposition of Piazza by committee in connection with plan confirmation [2.7]; Telephone conference with Pillatowicz [.3]; Telephone conference with Dr.Piazza [.5]; review multiples emails and draft my responses regarding the "leak" of the deposition zoom link to 3rd parties and demand for Protective Order [1.1]	4.6	\$895.00	\$4,117.00
11/7/2022	SKS	Review emails (multiple) from Lauren Schlusssel regarding committee request for emails between Ignatius and members regarding plan discovery and prepare emails (multiple) regarding same [.2]; review emails per responsiveness of request [1.4]	1.6	\$675.00	\$1,080.00
11/7/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding various issues relating to plan confirmation [.7]	0.7	\$675.00	\$472.50
11/7/2022	SKS	Conversations (multiple) with Teresa Pilatowicz regarding production of emails to committee counsel in response to plan discovery request [.6]	0.6	\$675.00	\$405.00
11/7/2022	SKS	Review posts by anti Front Sight agitators regarding deposition of Dr. Piazza [.3]; draft correspondence to committee counsel regarding same and review correspondence regarding same [.2]	0.5	\$675.00	\$337.50
11/7/2022	JT	Review L. Schlusssel email re committee's email request, attention to status of same (.4); Review and respond to multiple emails re review and production (.2); prepare responsive emails for forwarding to committee (.6)	1.2	\$270.00	\$324.00
11/7/2022	JSW	Analysis of Meacher's objection to confirmation of Debtor's second amended plan	0.5	\$395.00	\$197.50
11/7/2022	JLB	Review revised stipulation and order prepared by committee counsel re documents under seal in connection with plan objection [.2]; correspondence with financial advisors and team re same with recommendations [.1]	0.3	\$575.00	\$172.50
11/7/2022	JLB	Analysis of issues re discovery requested by committee and compliance with same	0.3	\$575.00	\$172.50
11/7/2022	SKS	Review stipulation regarding sealed plan exhibits and prepare correspondence to Dawn Cica regarding same and review correspondence from Dawn Cica [.2]	0.2	\$675.00	\$135.00
11/7/2022	SKS	Draft correspondence to Ignatius Piazza regarding objections to plan confirmation [.2]	0.2	\$675.00	\$135.00
11/7/2022	JLB	Multiple correspondence with committee counsel re deposition issues	0.2	\$575.00	\$115.00
11/7/2022	JLB	Analysis of correspondence with Piazza counsel re deposition prep	0.2	\$575.00	\$115.00
11/7/2022	JLB	Analysis of committee objection to disclosure statement	0.2	\$575.00	\$115.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/7/2022	JSW	Strategize re replying to multiple plan objections	0.2	\$395.00	\$79.00
11/7/2022	SKS	Conversation with Bob LeHane regarding Committee deposition of Dr. Piazza [.1]	0.1	\$675.00	\$67.50
11/7/2022	JLB	Strategize re replying to multiple plan objections	0.1	\$575.00	\$57.50
11/8/2022	STG	Telephone conference with Lehane (mult) [.3]; review stipulation from D. Cica [.5]; analyse issues re: demands for confidentiality with client [.5]; analyse issues with Sefflin and Pillatowicz re: terms and agreement on waiver of penalty [.4]	1.7	\$895.00	\$1,521.50
11/8/2022	JBK	Analyze plan objections filed by creditors' committee, Meacher, and the UST.	2.1	\$675.00	\$1,417.50
11/8/2022	SKS	Revise stipulation regarding debtor and Piazza parties' tax reorganization as requested by Nevada PF under plan [.9]; prepare correspondence to Sam Schwartz regarding same [1.]	1.9	\$675.00	\$1,282.50
11/8/2022	STG	Review email and objection sent by alledged creditor Granger [.4]and respond to the same[.3].	0.7	\$895.00	\$626.50
11/8/2022	SKS	Conversations (multiple) with Paul Huygens regarding various plan issues [.5]	0.5	\$675.00	\$337.50
11/8/2022	STG	Review email from Lehman re: stated objection by alledged claimant.	0.3	\$895.00	\$268.50
11/8/2022	SKS	Conversations (multiple) with Teresa Pilatowicz regarding plan and deposition [.3]	0.3	\$675.00	\$202.50
11/9/2022	JBK	Draft evidentiary objection to creditors' committee's objection to plan confirmation	2.2	\$675.00	\$1,485.00
11/9/2022	SKS	Review committee objection to plan confirmation [.3]; outline response [1.4]	1.7	\$675.00	\$1,147.50
11/9/2022	JSW	Draft omnibus reply to objections to Debtor's Second Amended Plan	2.6	\$395.00	\$1,027.00
11/9/2022	SKS	Prepare response to objections to plan confirmation [1.5]	1.5	\$675.00	\$1,012.50
11/9/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding information needed for replies to objections to plan confirmation and other plan related issues [1.0]	1.0	\$675.00	\$675.00
11/9/2022	SKS	Conversations (multiple) with Teresa Pilatowicz regarding various plan confirmation issues and deposition [.8]	0.8	\$675.00	\$540.00
11/9/2022	SKS	Research regarding what parties can attend contested matter deposition relating to plan confirmation [.8]	0.8	\$675.00	\$540.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/9/2022	SKS	Review emails (multiple) from Matt Stockl and David Grey regarding Meacher attendance at Piazza deposition in connection with objections to confirmation and prepare emails (multiple) regarding same [.6]	0.6	\$675.00	\$405.00
11/9/2022	SKS	Conversations (multiple) with Paul Huygens regarding confirmation issues [.6]	0.6	\$675.00	\$405.00
11/9/2022	SKS	Review further revised stipulation regarding tax steps needed under plan [.2]; draft correspondence to Sam Schwartz regarding same [.3]	0.5	\$675.00	\$337.50
11/9/2022	JLB	Analyze issues re preparation of replies to plan objections [.2]; analysis of ballot summary and impact on replies [.2]	0.4	\$575.00	\$230.00
11/9/2022	SKS	Revise Fialkowski certification regarding ballots [.2]; prepare correspondence to Adam Fialkowski regarding same [.1]	0.3	\$675.00	\$202.50
11/9/2022	JSW	Research case law cited in objections to Debtor's Second Amended Plan re preparing omnibus reply	0.4	\$395.00	\$158.00
11/9/2022	JSW	Strategize re omnibus reply to objections to Debtor's second amended plan	0.4	\$395.00	\$158.00
11/9/2022	SKS	Review LVDF objection to debtor and committee stipulation regarding Piazza deposition related to objection to confirmation [.2]	0.2	\$675.00	\$135.00
11/9/2022	SKS	Conversation with David Grey, counsel for Meacher, regarding Plan discovery and deposition [.2]	0.2	\$675.00	\$135.00
11/9/2022	JSW	Review ballot tabulation	0.2	\$395.00	\$79.00
11/9/2022	SKS	Conversation with Matt Stockl regarding deposition of Piazza re plan contested matter [.1]	0.1	\$675.00	\$67.50
11/10/2022	SKS	Draft reply to objections to plan confirmation [2.7]	2.7	\$675.00	\$1,822.50
11/10/2022	JBK	Revise reply brief in support of plan confirmation	2.1	\$675.00	\$1,417.50
11/10/2022	JSW	Draft omnibus reply to objections to Debtor's Second Amended Plan	3.2	\$395.00	\$1,264.00
11/10/2022	JLB	Analysis of issues re confirmation and relation to deposition of Piazza, in preparation for same	2.0	\$575.00	\$1,150.00
11/10/2022	JSW	Further draft omnibus reply to objections to the Debtor's Second Amended Plan	2.1	\$395.00	\$829.50
11/10/2022	JLB	Research and analyze authorities re mootness of certain confirmation objections	1.3	\$575.00	\$747.50
11/10/2022	JLB	Preparation of issues outline re deposition of I. Piazza	1.2	\$575.00	\$690.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/10/2022	SKS	Conversations (multiple) with Paul Huygens regarding plan confirmation issues [.6]	0.6	\$675.00	\$405.00
11/10/2022	SKS	Conversation with Adam Fialowksi regarding ballot tally [.6]	0.6	\$675.00	\$405.00
11/10/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding plan, ballot summary etc [.5]	0.5	\$675.00	\$337.50
11/10/2022	SKS	Review correspondence from Bryan Lindsey and Teresa Pilatowicz regarding stipulation re tax treatment under plan and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
11/10/2022	JSW	Analysis of issues re deposition of Piazza in connection with Committee's objection to the Second Amended Plan	0.3	\$395.00	\$118.50
11/10/2022	SKS	Conversation with Tanner James regarding liquidation analysis [.1]	0.1	\$675.00	\$67.50
11/10/2022	SKS	Review correspondence from Robert Thomas regarding status of plan and prepare correspondence regarding same [.1]	0.1	\$675.00	\$67.50
11/11/2022	SKS	Draft plan confirmation order [2.6]; prepare correspondence to counsel in this case regarding same [.1]	2.7	\$675.00	\$1,822.50
11/11/2022	JSW	Further draft proposed confirmation order	4.0	\$395.00	\$1,580.00
11/11/2022	SKS	Further revise debtor's reply to plan objections [1.6]	1.6	\$675.00	\$1,080.00
11/11/2022	SKS	Draft Seflin declaration regarding proposed confirmation order and informal objections [.3]; review informal objections and emails from Front Sight facebook group [.7]	1.0	\$675.00	\$675.00
11/11/2022	JBK	Finalize and file objections to the creditors' committee's objections to the plan.	0.8	\$675.00	\$540.00
11/11/2022	SKS	Conversations (multiple) with Teresa Pilatowicz regarding confirmation reply brief due and other confirmation issues [.8]	0.8	\$675.00	\$540.00
11/11/2022	SKS	Further revise reply to objections to plan per comments from client and other debtor professionals [.6]	0.6	\$675.00	\$405.00
11/11/2022	SKS	Revise motion to strike improper matter included in committee objection to plan confirmation [.6]	0.6	\$675.00	\$405.00
11/11/2022	SKS	Conversation with Adam Fialowski regarding ballot summary and informal objections [.5]	0.5	\$675.00	\$337.50
11/11/2022	SKS	Conversations (multiple) with Paul Huygens regarding various plan issues [.3]	0.3	\$675.00	\$202.50
11/11/2022	SKS	Review FS Dip joinder to reply to objections to plan confirmation [.2]; prepare correspondence to Sam Schwartz regarding same [.1]	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>
11/11/2022	SKS	Review proposed ballot certification and exhibits [.2]; prepare correspondence to Adam Fialkowski regarding same [.1]	0.3	\$675.00	\$202.50
11/11/2022	SKS	Review Piazzas joinder to reply to confirmation objections and provide input [.3]	0.3	\$675.00	\$202.50
11/11/2022	JSW	Draft proposed order confirming Debtor's Second Amended Plan	0.5	\$395.00	\$197.50
11/11/2022	SKS	Review Wilson declaration filed in support of plan confirmation [.1]; prepare correspondence to Sam Schwartz regarding same [.1]	0.2	\$675.00	\$135.00
11/11/2022	SKS	Review correspondence from committee counsel regarding request for excel version of ballot summary and prepare correspondence regarding same [.1]; prepare correspondence to Stretto regarding request for most recent version [.1]	0.2	\$675.00	\$135.00
11/11/2022	JLB	Analysis of correspondence re Piazza deposition	0.1	\$575.00	\$57.50
11/12/2022	SKS	Review emails (multiple) from Jason Adams regarding request for ballot tally in excel and prepare emails regarding same [.2]; review email and document from Adam Fialowski regarding ballot tally in excel [.2]	0.4	\$675.00	\$270.00
11/13/2022	SKS	Conference call with Paul Huygens and Greg Garman regarding terms of settlement with committee [1.0]	1.0	\$675.00	\$675.00
11/13/2022	SKS	Review emails (multiple) from Greg Garman regarding settlement with committee over plan confirmation and prepare correspondence (multiple) regarding same [.4]	0.4	\$675.00	\$270.00
11/13/2022	SKS	Conversation with Ignatius Piazza regarding settlement with committee regarding plan confirmation [.1]	0.1	\$675.00	\$67.50
11/14/2022	STG	review settlement emails and proposals regarding plan [1.0] and work thru issues resolving committee claims and objections including multiple calls with Garman, client and counsel [2.9].	3.9	\$895.00	\$3,490.50
11/14/2022	JLB	Analysis of issues re settlement reached resolving need for Piazza deposition re plan confirmation	0.2	\$575.00	\$115.00
11/15/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding various issues regarding plan, transition of business, etc. [.7]	0.7	\$675.00	\$472.50
11/15/2022	SKS	Analysis of issues regarding plan feasibility and budget [.7]	0.7	\$675.00	\$472.50
11/15/2022	SKS	Review emails (multiple) from committee counsel regarding resolution of committee objection to confirmation and prepare emails (multiple) regarding same [.5]	0.5	\$675.00	\$337.50
11/15/2022	SKS	Review correspondence from Adam Fialkowski regarding appearing at confirmation hearing [.1]; prepare correspondence to Andrea Mendoza regarding same [.1]	0.2	\$675.00	\$135.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/16/2022	STG	Telephone conference with Garman, Huygens and Lehane (mult) re: upcoming plan confirmation and trailing issues [2.7]; analysis of issues relating to consensual confirmation [1.3]; review plan regarding same [.5]; prepare outline regarding same [.8].	5.3	\$895.00	\$4,743.50
11/16/2022	SKS	Draft creditor trust agreement [1.8]	1.8	\$675.00	\$1,215.00
11/16/2022	JBK	Discussions and research regarding reply brief in support of confirmation of plan.	1.3	\$675.00	\$877.50
11/16/2022	SKS	Review and revise stipulation regarding treatment of certain liens claims and interests [.7]; review plan and recorded documents regarding same [.6]	1.3	\$675.00	\$877.50
11/16/2022	SKS	Conversations (multiple) with Paul Huygens regarding various plan confirmation issues and trust [1.1]	1.1	\$675.00	\$742.50
11/16/2022	SKS	Conference call with Bryan Lindsey and Sam Schwartz regarding various business and transition issues under plan [.8]	0.8	\$675.00	\$540.00
11/16/2022	SKS	Conference call with Paul Huygens, Tanner James, Sam Schwartz et al regarding transition and terms of trust under plan [.8]	0.8	\$675.00	\$540.00
11/16/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding various confirmation issues [.7]	0.7	\$675.00	\$472.50
11/16/2022	SKS	Conversation with Lauren Schlüssel regarding plan confirmation [.6]	0.6	\$675.00	\$405.00
11/17/2022	STG	Preparation for plan confirmation hearing including reviewing all objections by letter and written [3.0]; multiple Telephone conference with Official Committee of Unsecured Creditors and Professionals [4.5].	7.5	\$895.00	\$6,712.50
11/17/2022	SKS	Prepare for plan confirmation hearing and review documents [3.4]	3.4	\$675.00	\$2,295.00
11/17/2022	STG	Telephone conference with Lehane, Garman re various Plan issues.	1.9	\$895.00	\$1,700.50
11/17/2022	SKS	Conference call with Bob LeHane, Paul Huygens and Steve Gubner regarding possible creditor trust and funding issues under plan [.7]	0.7	\$675.00	\$472.50
11/17/2022	SKS	Conference call with Paul Huygens and Steve Gubner regarding plan funding issues [.6]	0.6	\$675.00	\$405.00
11/17/2022	SKS	Draft stipulation resolving committee objection to plan confirmation [.5]; prepare correspondence to counsel regarding same [.1]	0.6	\$675.00	\$405.00
11/17/2022	SKS	Conversations (multiple) with Bryan Lindsey regarding various plan issues [.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>
11/17/2022	SKS	Conversation with Ignatius Piazza regarding various plan issues [.5]	0.5	\$675.00	\$337.50
11/17/2022	SKS	Conference call with Teresa Pilatowicz and Greg Garman regarding plan issues [.3]	0.3	\$675.00	\$202.50
11/18/2022	STG	Review stipulation for resolution of Objection [.6]; emails with counsel and Telephone conference with counsel re: resolution of objections [.4]; further preparation for plan confirmation [2.9]	3.9	\$895.00	\$3,490.50
11/18/2022	JBK	Preapre for and participate in plan confirmation hearing.	4.4	\$675.00	\$2,970.00
11/18/2022	SKS	Appear at plan confirmation hearing [2.7]	2.7	\$675.00	\$1,822.50
11/18/2022	JSW	Attend hearings on plan confirmation and omnibus objections to claims and prepare correspondence to S. Seflin when necessary.	2.7	\$395.00	\$1,066.50
11/18/2022	SKS	Revise confirmation order [1.3]; draft correspondence to counsel regarding same [.1]	1.4	\$675.00	\$945.00
11/18/2022	SKS	Further prepare for confirmation hearing [1.2]	1.2	\$675.00	\$810.00
11/18/2022	SKS	Conversations (multiple) with Paul Huygens regarding confirmation issues [.4]	0.4	\$675.00	\$270.00
11/18/2022	SKS	Conference call with Bryan Lindsey and Paul Huygens regarding plan and transition issues [.3]	0.3	\$675.00	\$202.50
11/18/2022	SKS	Conversation with Bryan Lindsey regarding stipulation with PrairieFire regarding confirmation [.2]	0.2	\$675.00	\$135.00
11/18/2022	JSW	Draft order approving stipulation to resolve Committee's objection to confirmation of the Debtor's Second Amended Plan	0.3	\$395.00	\$118.50
11/20/2022	STG	Multiple calls and emails re: transition and issues with PF [1.1]; review multiple emails on solution re: short term funding and extending close to 12-1. [1.3]	2.4	\$895.00	\$2,148.00
11/20/2022	SKS	Conversations (multiple) with Paul Huygens regarding PrairieFire's demand for immediate access to CRM and other confirmation issues [.5]	0.5	\$675.00	\$337.50
11/20/2022	SKS	Confernece call with Greg Garman and Ignatius Piazza regarding PF request for CRM and related confirmation issues [.4]	0.4	\$675.00	\$270.00
11/20/2022	SKS	Draft correspondence to Ignatius Piazza and Greg Garman regarding PF request for CRM and confirmation order [.3]; review correspondence regarding same [.1]	0.4	\$675.00	\$270.00
11/20/2022	SKS	Conference call with Paul Huygens and Sam Schwartz regarding PF demand for CRM or it will interfere with confirmation [.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>
11/21/2022	SKS	Revise confirmation order per comments from LVDF, Nevada PF and Dr. Piazza [1.6]; prepare correspondence to opposing counsel regarding same [.1]	1.7	\$675.00	\$1,147.50
11/21/2022	SKS	Continue drafting liquidating trust agreement [1.3]	1.3	\$675.00	\$877.50
11/21/2022	SKS	Review redline to confirmation order from Dr. Piazza [.3]; review redline to confirmation order from Nevada PF [.5]	0.8	\$675.00	\$540.00
11/21/2022	SKS	Conversation with Paul Huygens regarding liquidating trust and distributions under plan [.4]	0.4	\$675.00	\$270.00
11/21/2022	SKS	Conversations (multiple) with Teresa Pilatowicz regarding Dr. Piazza's comments on confirmation order [.3]	0.3	\$675.00	\$202.50
11/21/2022	SKS	Conversation with Ed McDonald regarding confirmation order [.2]	0.2	\$675.00	\$135.00
11/21/2022	SKS	Conversation with Gabby Hamm regarding Nevada PF revisions to confirmation order [.2]	0.2	\$675.00	\$135.00
11/22/2022	SKS	Draft liquidating trust agreement [2.7]	2.7	\$675.00	\$1,822.50
11/22/2022	STG	Review multiple emails and requested changes to proposed confirmation order [1.1]; analyze issues re: deadlines in relation to defaults and timing [.5].	1.6	\$895.00	\$1,432.00
11/22/2022	STG	Review documents and emails from UST on amendments to orders [.3]; review UCC comments to order [.2]; various emails to Greg and others on same and tel confs same [1.1].	1.6	\$895.00	\$1,432.00
11/22/2022	SKS	Draft application for order shortening time regarding form of confirmation order [.5]	0.5	\$675.00	\$337.50
11/22/2022	SKS	Conversations (multiple) with Lauren Schlusel regarding plan confirmation order and liquidating trust [.5]	0.5	\$675.00	\$337.50
11/22/2022	SKS	Conversation with Tanner James regarding various confirmation issues [.5]	0.5	\$675.00	\$337.50
11/22/2022	SKS	Conversations (multiple) with Ed McDonald regarding confirmation order [.3]	0.3	\$675.00	\$202.50
11/22/2022	JLB	Analysis of issues re dispute over confirmation order with equity investor	0.3	\$575.00	\$172.50
11/22/2022	SKS	Conversation with Ignatius Piazza regarding confirmation order [.2]	0.2	\$675.00	\$135.00
11/22/2022	SKS	Conversation with Greg Garman regarding confirmation order [.2]	0.2	\$675.00	\$135.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/23/2022	STG	Review multiple emails and response re: confirmation Order [.4]; review Application and OST [.2] and draft same [.6]; Telephone conference with Garman and Huygens re: issues with timing on confirmation. (mult) [.7].	1.9	\$895.00	\$1,700.50
11/23/2022	SKS	Further revise confirmation order per comments from six different people [2.1]	2.1	\$675.00	\$1,417.50
11/23/2022	SKS	Revise liquidating trust per committee counsel's comments [1.3]	1.3	\$675.00	\$877.50
11/23/2022	SKS	Review emails (multiple) from Sam Schwartz regarding confirmation order and prepare emails (Multiple) regarding same [.8]	0.8	\$675.00	\$540.00
11/23/2022	SKS	Conversations (multiple) with Tanner James regarding information needed for confirmation order [.5]	0.5	\$675.00	\$337.50
11/23/2022	SKS	Review emails (multiple) from Sam Schwartz and Brian Shapiro regarding additional comments on confirmation order and prepare correspondence regarding same [.4]	0.4	\$675.00	\$270.00
11/23/2022	SKS	Conversation with Lauren Schlusel regarding trust agreement [.4]	0.4	\$675.00	\$270.00
11/23/2022	SKS	Draft correspondence to counsel regarding application for order shortening time for hearing on confirmation order [.2]	0.2	\$675.00	\$135.00
11/23/2022	SKS	Conversation with Brian Shapiro regarding confirmation order [.1]	0.1	\$675.00	\$67.50
11/23/2022	SKS	Prepare attorney information sheet re app for OST regarding confirmation order [.1]	0.1	\$675.00	\$67.50
11/28/2022	STG	Review documents, emails re: effective date and stipulations and issues re: confirmation order and approve same.	1.2	\$895.00	\$1,074.00
11/28/2022	SKS	Revise liquidating trust agreement [.4]; review multiple emails from Lauren Schlusel regarding same and prepare correspondence regarding same [.2]	0.6	\$675.00	\$405.00
11/28/2022	SKS	Further revise confirmation order per additional comments and review [.5]	0.5	\$675.00	\$337.50
11/28/2022	SKS	Conversations (multiple) with Tanner James regarding various confirmation issues [.4]	0.4	\$675.00	\$270.00
11/28/2022	SKS	Review correspondence and documents from Tanner James regarding proposed closing financials on the effective date of the plan [.4]	0.4	\$675.00	\$270.00
11/28/2022	SKS	Draft Seflin declaration regarding submission of revised plan confirmation order [.1]; prepare correspondence to Sam Schwartz regarding same and review correspondence regarding same [.2]	0.3	\$675.00	\$202.50



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/28/2022	SKS	Review emails (multiple) from Dawn Cica regarding hearing on form of confirmation order and prepare correspondence regarding same [.3]	0.3	\$675.00	\$202.50
11/28/2022	SKS	Conversations (multiple) with Lauren Shlussel regarding liquidating trust [.3]	0.3	\$675.00	\$202.50
11/28/2022	SKS	Draft correspondence to Sam Schwartz regarding confirmation order and PrairieFire comments [.2]	0.2	\$675.00	\$135.00
11/28/2022	SKS	Conference call with Paul Huygens and Tanner James regarding confirmation order and financials [.2]	0.2	\$675.00	\$135.00
11/28/2022	SKS	Conversation with Amanda Demby regarding trust agreement [.2]	0.2	\$675.00	\$135.00
11/28/2022	JLB	Analysis of issues re status of discussions on confirmation order and resolving same	0.2	\$575.00	\$115.00
11/28/2022	JSW	Draft third plan supplement	0.2	\$395.00	\$79.00
11/29/2022	STG	Review documents and filed docs for purposes of transitioning to Garman firm [1.9]; emails requesting substitution and start process to transition 100k plus pages of documents to new firm subbing in [1.8].	3.7	\$895.00	\$3,311.50
11/29/2022	SKS	Prepare emails (multiple) to opposing counsel regarding plan confirmation order and review emails (multiple) regarding same regarding form of order [.7]	0.7	\$675.00	\$472.50
11/29/2022	SKS	Review emails (multiple) from Tanner James regarding sources and uses of funds to be paid under plan and review spreadsheet regarding same and prepare correspondence regarding same [.4]	0.4	\$675.00	\$270.00
11/29/2022	SKS	Revise liquidating trust agreement [.1]; prepare emails (multiple) to Ignatius Piazza and Amanda Demby regarding same [.2]	0.3	\$675.00	\$202.50
11/29/2022	JSW	Draft order approving the second amended disclosure statement	0.5	\$395.00	\$197.50
11/29/2022	SKS	Prepare correspondence to Amanda Demby with executed liquidating trust agreement and review correspondence regarding same [.2]	0.2	\$675.00	\$135.00
11/29/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding liquidating trust [.2]	0.2	\$675.00	\$135.00
11/29/2022	SKS	Conversation with Andrea Mendoza regarding obtaining consent of confirmation order and November 29, 2022 hearing coming off calendar [.1]	0.1	\$675.00	\$67.50
11/30/2022	SKS	Draft response to Sam Schwartz email about PrairieFire's failure to pay cash contribution pursuant to confirmation order [.8]; review confirmation order and plan regarding same [.6]	1.4	\$675.00	\$945.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/30/2022	SKS	Conference call with Paul Huygens, Steve Gubner, Greg Garman, Ignatius Piazza, and Tanner James regarding PrairieFire's breach of confirmation order [1.0]	1.0	\$675.00	\$675.00
11/30/2022	SKS	Review documents and correspondence related to Dr. Piazza's transfer of his guns in connection with PF failure to comply with confirmation order [.8]	0.8	\$675.00	\$540.00
11/30/2022	SKS	Review correspondence from Sam Schwartz regarding PrairieFire breach of confirmation order and failure to pay cash contribution [.1]; analysis of issues regarding same [.5]	0.6	\$675.00	\$405.00
11/30/2022	SKS	Conversations (multiple) with Ignatius Piazza regarding PrairieFire breach of confirmation order and issues related thereto [.5]	0.5	\$675.00	\$337.50
11/30/2022	SKS	Conversation with Jessica Pace regarding wire transfer under confirmation order [.1]	0.1	\$675.00	\$67.50
12/1/2022	SKS	Further research regarding ability to enforce confirmation order and potential damages to estate [1.7]	1.7	\$675.00	\$1,147.50
12/1/2022	SKS	Draft correspondence (multiple) to Sam Schwartz regarding PF breach of confirmation order and motion for contempt and review emails regarding same and related to gun inventory [1.3]	1.3	\$675.00	\$877.50
12/1/2022	SKS	Draft motion to enforce confirmation order [1.1]	1.1	\$675.00	\$742.50
12/1/2022	SKS	Research regarding enforcement of confirmation order for failure to perform under terms [.9]	0.9	\$675.00	\$607.50
12/1/2022	SKS	Conversations (multiple) with Sam Schwartz regarding PF breach of confirmation order and related issues [.6]; conversation with Sam Schwartz regarding stipulation on Bill Wilson [.1]	0.7	\$675.00	\$472.50
12/1/2022	JSW	Draft motion to enforce terms of confirmation order	1.0	\$395.00	\$395.00
12/1/2022	SKS	Revise stipulation to replace Wilson with Reid under plan [.4]; prepare correspondence to Bryan Lindsey regarding same [.1]	0.5	\$675.00	\$337.50
12/1/2022	SKS	Conversations (multiple) with Lauren Schlusel regarding PF failure to pay plan contribution and related issues [.5]	0.5	\$675.00	\$337.50
12/1/2022	JSW	Analysis of issues re Prairie Fire's contempt of confirmation order and next steps to remedy the contempt	0.6	\$395.00	\$237.00
12/2/2022	SKS	Review email from Sam Schwartz regarding A&D books updated and closing of escrow and draft internal correspondence regarding same [.6]	0.6	\$675.00	\$405.00
12/5/2022	SKS	Review emails (multiple) and documents from Ignatius Piazza regarding title to containers and reorganized debtor ownership [.8]	0.8	\$675.00	\$540.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
12/5/2022	SKS	Conversation with Lauren Schlusser regarding status of effective date and related issues [.3]	0.3	\$675.00	\$202.50
12/5/2022	SKS	Review correspondence from Brian Shapiro regarding funding of LVDF reserve account under plan and prepare correspondence regarding same [.1]	0.1	\$675.00	\$67.50
12/5/2022	SKS	Prepare correspondence to committee counsel regarding effective date and review correspondence regarding same [.1]	0.1	\$675.00	\$67.50
Subtotal [170] Plan & Disclosure Statement			477.0		\$318,378.00
<u>[180] Relief from Stay Proceedings</u>					
9/9/2022	STG	Review pleadings for all 4 motions and prepare for hearing [3.3]; Hearing on Motion for Relief from Stay, Intervention, Remand, Strike, [2.1]; review and respond to multiple emails from client and counsel [.5]; review emails and response thereto from counsel for OCUC [.3];	6.2	\$895.00	\$5,549.00
9/9/2022	SKS	Appear at court's oral ruling on LVDF relief from stay motion [.4]	0.4	\$675.00	\$270.00
9/9/2022	JSW	Strategize re outcome of continued hearing on motion for relief from stay	0.1	\$395.00	\$39.50
9/13/2022	JLB	Analysis of correspondence from LVDF counsel re potential stipulation re stay violation issues	0.2	\$575.00	\$115.00
Subtotal [180] Relief from Stay Proceedings			6.9		\$5,973.50
<u>[Lit] Litigation -</u>					
10/25/2022	SKS	Review pleadings from 2007 class action, settlement and judgment relating to Platinum member claims [1.7]	1.7	\$675.00	\$1,147.50
11/7/2022	SKS	Conversation with Lauren Schlusser regarding production of member emails and whether debtor needs to get a protective order [.1]	0.1	\$675.00	\$67.50
11/8/2022	SKS	Revise stipulation regarding confidentiality of Piazza deposition [.3]	0.3	\$675.00	\$202.50
11/8/2022	SKS	Review correspondence from Dawn Cica regarding Piazza deposition by committee counsel and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
11/9/2022	STG	Telephone conference with Client [.3]; email to D. Cica [.1]; review final changes on confidential stip for deposition [.3]; review objection by Lvdf [.5]; Telephone conference with client [.3]; preparation for deposition of Piazza [4.3]	5.8	\$895.00	\$5,191.00
11/9/2022	STG	Depo prep w Ignatius (avaya) Teresa Pilatowicz and Greg Garman.	2.9	\$895.00	\$2,595.50



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
11/11/2022	STG	Depo prep w Ignatius (avaya) Teresa Pilatowicz and Greg Garman.	3.0	\$895.00	\$2,685.00
11/13/2022	STG	Depo prep w Ignatius (avaya) Teresa Pilatowicz and Greg Garman.	3.0	\$895.00	\$2,685.00
11/14/2022	STG	Preparation for depositions of interested parties [3.3].	3.3	\$895.00	\$2,953.50
Subtotal [Lit] Litigation -			20.3		\$17,662.50
Subtotal [5890.002] Front Sight Management Ch. 11 BK 22-11824			867.1		\$534,946.00
[5890.002.01]	Front Sight v. Las Vegas Development Fund (Removed Action) -				
9/1/2022	STG	Further preparation on motion for violation of the stay (2.0); and attendance at hearing on motion for violation of the stay (2.2).	4.2	\$895.00	\$3,759.00
9/1/2022	JBK	Prepare for and argue motion for violation of stay order and to vacate stay court order.	4.8	\$675.00	\$3,240.00
9/1/2022	SKS	Appear at hearing on motion to set aside terminating sanctions order as void [1.2]	1.2	\$675.00	\$810.00
9/1/2022	JSW	Strategize re outcome of hearing on motion for violation of stay	0.5	\$395.00	\$197.50
9/1/2022	JLB	Analysis of hearing outcome related to terminating sanctions issue	0.3	\$575.00	\$172.50
9/7/2022	JLB	Straetgy re mediation and potential relationship to continued hearings re stay violations	0.4	\$575.00	\$230.00
9/9/2022	JBK	Attend hearing on Court's rulings on motion to remand, motion for appointment of an examiner, motion to lift stay, and motion to intervene.	4.0	\$675.00	\$2,700.00
9/9/2022	SKS	Appear at court's oral ruling on LVDF remand motion [1.0]	1.0	\$675.00	\$675.00
9/9/2022	JLB	Analysis of issues relating to potential mediation in preparation for hearings on remand/stay violation	0.5	\$575.00	\$287.50
9/9/2022	JLB	Analysis of issues re hearing outcomes on remand and stay violation issues related to case strategy	0.4	\$575.00	\$230.00
9/9/2022	JLB	Multiple correspondence with litigation team relating to sanctions motion strategy	0.3	\$575.00	\$172.50
9/12/2022	SKS	Analysis of issues regarding motion to void terminating sanctions order as violation of the stay [.7]	0.7	\$675.00	\$472.50
9/13/2022	SKS	Draft stipulation resolving debtor's motion for order that terminating sanctions order is void [1.4]; further revise per comments [.4]	1.8	\$675.00	\$1,215.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
9/13/2022	SKS	Conversations (multiple) with Brian Shapiro regarding resolution of motion for order that terminating sanctions order is void [.5]	0.5	\$675.00	\$337.50
9/13/2022	SKS	Conversation with Lauren Schlusel regarding whether the debtor should stipulate to void the terminating sanctions order [.4]	0.4	\$675.00	\$270.00
9/13/2022	SKS	Conversations (multiple) with Greg stipulating to void the terminating sanctions order [.4]	0.4	\$675.00	\$270.00
9/13/2022	SKS	Conversation with Ignatius Piazza regarding stipulation that terminating sanctions order is void [.3]	0.3	\$675.00	\$202.50
9/14/2022	SKS	Draft order on stipulation resolving debtor's motion to void terminating sanctions order [.6]	0.6	\$675.00	\$405.00
9/14/2022	SKS	Review emails (multiple) from Brian Shapiro regarding comments on stipulation regarding terminating sanctions order and draft emails regarding same [.5]	0.5	\$675.00	\$337.50
9/14/2022	SKS	Conversations (multiple) with Brian Shapiro regarding stipulation resolving motion to void terminating sanctions order [.5]	0.5	\$675.00	\$337.50
9/14/2022	SKS	Revise stipulation voiding terminating sanctions order multiple times [.4]	0.4	\$675.00	\$270.00
9/14/2022	STG	Review and revise stipulation on stay violations and analyse same.	0.2	\$895.00	\$179.00
9/14/2022	SKS	Conversation with Andrea Mendoza regarding stipulation resolving debtor's motion to void terminating sanctions order and taking it off calendar [.1]	0.1	\$675.00	\$67.50
9/22/2022	STG	Review all 5 volumnes/days of deposition testimony by Dizubla related LVDF claims.	3.9	\$895.00	\$3,490.50
10/1/2022	STG	Review issues and analyze proposal by LVDF to estimate claims [.8]; review prior state court orders re: same [.4]	1.2	\$895.00	\$1,074.00
10/3/2022	STG	Analysis of documents and review multiple emails and original agreement with Debtor and LVDF [2.2]; review and approve UCC response to demand for disclosure and approve response to LVDF [.4]	2.6	\$895.00	\$2,327.00
10/9/2022	STG	Review potential disclosures re: Transcripts [.3]; review email to counsel re: request for release [.1]	0.4	\$895.00	\$358.00



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/18/2022	JT	Initial review of third party document subpoenas (.2); analysis of imported LVDF data, review error messages, and prepare additional volumes of previously produced documents for review, prepare review templates, attention to coding issues (1.0); further review of third party productions, prepare outline for revised load files (.7)	1.9	\$270.00	\$513.00
10/19/2022	JLB	Respond to email from Brian Shapiro re LVDF discovery meet and confer	0.1	\$575.00	\$57.50
10/21/2022	SKS	Review correspondence from Brian Shapiro regarding continuing status conference in adversary and prepare correspondence regarding same [.1]	0.1	\$675.00	\$67.50
11/28/2022	SKS	Conference call with Teresa Pilatowicz and Jason Komorsky regarding LVDF mediation brief [.6]	0.6	\$675.00	\$405.00
11/29/2022	SKS	Revise letter to JAMS regarding termination of BG [.1]	0.1	\$675.00	\$67.50
12/2/2022	SKS	Review correspondence (multiple) from JAMs regarding withdrawing as counsel for the debtor in mediation and liability for fees and prepare correspondence (multiple) regarding same [.8]	0.8	\$675.00	\$540.00
12/2/2022	SKS	Conversation with Teresa Pilatowicz regarding Garman Turner taking over mediation responsibility [.2]	0.2	\$675.00	\$135.00
12/3/2022	SKS	Review correspondence from Ignatius Piazza regarding JAMs billing post-effective date and prepare correspondence regarding same [.2]	0.2	\$675.00	\$135.00
12/5/2022	SKS	Conversation with Teresa Pilatowicz regarding transition of representation in LVDF matter [.1]	0.1	\$675.00	\$67.50
12/9/2022	SKS	Prepare correspondence (multiple) to Teresa Pilatowicz regarding mediation and transition and review correspondence regarding same [.3]	0.3	\$675.00	\$202.50
Subtotal [5890.002.01] Front Sight v. Las Vegas Development Fund (Removed [5890.002.04] Meacher Claim Objection			36.5		\$26,278.00
10/20/2022	JSW	Strategize re preparing complaint against Meacher for fraudulent transfers and objection to claim	0.2	\$395.00	\$79.00
10/25/2022	JSW	Review documents, including transcript of 2004 exam of Dianne Meacher re preparing complaint against the Meachers	2.3	\$395.00	\$908.50
10/26/2022	JSW	Further draft complaint against the Meachers	1.8	\$395.00	\$711.00
10/26/2022	JSW	Draft complaint against the Meachers	1.2	\$395.00	\$474.00
10/27/2022	JSW	Draft complaint against the Meachers	3.1	\$395.00	\$1,224.50



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For the period from 9/1/2022 through 12/9/2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
10/27/2022	JSW	Further research re recession of contract re preparing complaint against the Meachers	1.0	\$395.00	\$395.00
10/27/2022	JSW	Strategize re causes of action to include in complaint against the Meachers	0.6	\$395.00	\$237.00
10/28/2022	JSW	Further draft complaint against the Meachers	5.0	\$395.00	\$1,975.00
10/28/2022	JSW	Strategize re causes of action to include in complaint against the Meachers	0.5	\$395.00	\$197.50
10/28/2022	JLB	Further analysis of issues re claim structure in Meacher complaint	0.3	\$575.00	\$172.50
10/31/2022	SKS	Revise complaint against M. Meacher and D. Meacher [.9]; draft correspondence to client regarding same [.1]	1.0	\$675.00	\$675.00
10/31/2022	JSW	Revise complaint against the Meachers	0.9	\$395.00	\$355.50
10/31/2022	SKS	Prepare correspondence to Teresa Pilatowicz regarding Meacher complaint and review correspondence regarding same [.2]	0.2	\$675.00	\$135.00
11/8/2022	SKS	Revise Meacher complaint [.9]	0.9	\$675.00	\$607.50
11/9/2022	JSW	Analysis of issues re preparing complaint against the Meachers	0.3	\$395.00	\$118.50
Subtotal [5890.002.04] Meacher Claim Objection			19.3		\$8,265.50
Total Fees for Professional Services Rendered:			922.9		\$569,489.50



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EXHIBIT 1 (CONTINUED) - PROFESSIONAL RATE SUMMARY			For 2022	For the period from 9/1/2022 through 12/9/2022		
Initials	Prof Name	Prof Type	Rate/Hr	Hours	Blended Rate	Amount
JBK	Jason B. Komorsky	Partner	\$675.00	47.4		\$31,995.00
JLB	Jessica L. Bagdanov	Partner	\$575.00	50.4		\$28,980.00
JSW	Jessica S. Wellington	Associate	\$395.00	174.1		\$68,769.50
JT	Juanita Treshinsky	Paralegal	\$270.00	44.0		\$11,880.00
SKS	Susan K. Seflin	Partner	\$675.00	408.9		\$276,007.50
STG	Steven T. Gubner	Equity Partner	\$895.00	167.3		\$143,289.50
YD	Yves Derac	Paralegal	\$280.00	30.8		\$8,568.00
Total				922.9	\$617.07	\$569,489.50



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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	867.1	\$534,946.00
	Asset Analysis & Recovery	8.9	\$5,839.50
	Business Operations	15.0	\$10,125.00
	Case Administration	28.5	\$22,003.00
	Claims Admin	220.8	\$114,424.00
	Fee/Employment Applications	79.2	\$34,041.00
	Fee/Employment Objections	3.4	\$1,575.00
	Financing	7.1	\$4,924.50
	Plan & Disclosure Statement	477.0	\$318,378.00
	Relief from Stay Proceedings	6.9	\$5,973.50
	Litigation -	20.3	\$17,662.50
5890.002.01	Front Sight v. Las Vegas Development Fund (Removed Action) -	36.5	\$26,278.00
5890.002.04	Meacher Claim Objection	19.3	\$8,265.50
	Grand Total	<u>922.9</u>	<u>\$569,489.50</u>



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EXHIBIT 1 (CONTINUED) - BILLING RECORD SUMMARY	Fees	Costs	Total
[5890.002] Front Sight Management Ch. 11 BK 22-11824	\$534,946.00	\$11,037.03	\$545,983.03
Subtotal [100] Asset Analysis & Recovery	\$5,839.50		\$5,839.50
Subtotal [110] Business Operations	\$10,125.00		\$10,125.00
Subtotal [115] Case Administration	\$22,003.00		\$22,003.00
Subtotal [120] Claims Admin	\$114,424.00		\$114,424.00
Subtotal [130] Fee/Employment Applications	\$34,041.00		\$34,041.00
Subtotal [135] Fee/Employment Objections	\$1,575.00		\$1,575.00
Subtotal [140] Financing	\$4,924.50		\$4,924.50
Subtotal [170] Plan & Disclosure Statement	\$318,378.00		\$318,378.00
Subtotal [180] Relief from Stay Proceedings	\$5,973.50		\$5,973.50
Subtotal [Lit] Litigation -	\$17,662.50		\$17,662.50
[5890.002.01] Front Sight v. Las Vegas Development Fund (Removed)	\$26,278.00		\$26,278.00
[5890.002.04] Meacher Claim Objection	\$8,265.50		\$8,265.50
[5890.002.05] Front Sight Management v Meacher 22-01152-abl		\$208.00	\$208.00
Total	\$569,489.50	\$11,245.03	\$580,734.53

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	8.1	\$675.00	\$5,467.50
	SKS	Susan K. Seflin	Partner	0.2	\$675.00	\$135.00
	JSW	Jessica S. Wellington	Associate	0.6	\$395.00	\$237.00
		[100] Asset Analysis & Recovery Subtotal		8.9		\$5,839.50
		[110] Business Operations				
	SKS	Susan K. Seflin	Partner	15.0	\$675.00	\$10,125.00
		[110] Business Operations Subtotal		15.0		\$10,125.00
		[115] Case Administration				
	JLB	Jessica L. Bagdanov	Partner	0.1	\$575.00	\$57.50
	SKS	Susan K. Seflin	Partner	15.5	\$675.00	\$10,462.50
	STG	Steven T. Gubner	Equity Partner	12.8	\$895.00	\$11,456.00
	JT	Juanita Treshinsky	Paralegal	0.1	\$270.00	\$27.00
		[115] Case Administration Subtotal		28.5		\$22,003.00
		[120] Claims Admin				
	JBK	Jason B. Komorsky	Partner	11.4	\$675.00	\$7,695.00
	JLB	Jessica L. Bagdanov	Partner	22.2	\$575.00	\$12,765.00
	SKS	Susan K. Seflin	Partner	58.1	\$675.00	\$39,217.50
	STG	Steven T. Gubner	Equity Partner	15.0	\$895.00	\$13,425.00
	JSW	Jessica S. Wellington	Associate	84.1	\$395.00	\$33,219.50
	JT	Juanita Treshinsky	Paralegal	29.8	\$270.00	\$8,046.00
	YD	Yves Derac	Paralegal	0.2	\$280.00	\$56.00
		[120] Claims Admin Subtotal		220.8		\$114,424.00
		[130] Fee/Employment Applications				
	SKS	Susan K. Seflin	Partner	15.5	\$675.00	\$10,462.50
	STG	Steven T. Gubner	Equity Partner	4.7	\$818.83	\$3,848.50
	JSW	Jessica S. Wellington	Associate	28.4	\$395.00	\$11,218.00
	YD	Yves Derac	Paralegal	30.6	\$278.17	\$8,512.00
		[130] Fee/Employment Applications Subtotal		79.2		\$34,041.00
		[135] Fee/Employment Objections				
	JLB	Jessica L. Bagdanov	Partner	0.2	\$575.00	\$115.00
	SKS	Susan K. Seflin	Partner	0.7	\$675.00	\$472.50
	JSW	Jessica S. Wellington	Associate	2.5	\$395.00	\$987.50
		[135] Fee/Employment Objections Subtotal		3.4		\$1,575.00
		[140] Financing				
	SKS	Susan K. Seflin	Partner	6.5	\$675.00	\$4,387.50
	STG	Steven T. Gubner	Equity Partner	0.6	\$895.00	\$537.00



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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>
			[140] Financing Subtotal	7.1		\$4,924.50
[170] Plan & Disclosure Statement						
	JBK	Jason B. Komorsky	Partner	19.1	\$675.00	\$12,892.50
	JLB	Jessica L. Bagdanov	Partner	25.4	\$575.00	\$14,605.00
	SKS	Susan K. Seflin	Partner	281.8	\$675.00	\$190,215.00
	STG	Steven T. Gubner	Equity Partner	97.5	\$832.58	\$81,176.50
	JSW	Jessica S. Wellington	Associate	41.0	\$395.00	\$16,195.00
	JT	Juanita Treshinsky	Paralegal	12.2	\$270.00	\$3,294.00
			[170] Plan & Disclosure Statement Subtotal	477.0		\$318,378.00
[180] Relief from Stay Proceedings						
	JLB	Jessica L. Bagdanov	Partner	0.2	\$575.00	\$115.00
	SKS	Susan K. Seflin	Partner	0.4	\$675.00	\$270.00
	STG	Steven T. Gubner	Equity Partner	6.2	\$895.00	\$5,549.00
	JSW	Jessica S. Wellington	Associate	0.1	\$395.00	\$39.50
			[180] Relief from Stay Proceedings Subtotal	6.9		\$5,973.50
[Lit] Litigation -						
	SKS	Susan K. Seflin	Partner	2.3	\$675.00	\$1,552.50
	STG	Steven T. Gubner	Equity Partner	18.0	\$895.00	\$16,110.00
			[Lit] Litigation - Subtotal	20.3		\$17,662.50
			5890.002 Front Sight Management Ch. 11 BK 22-11824 Subtotal	867.1		\$534,946.00
5890.002.01			Front Sight v. Las Vegas Development Fund (Removed Action) -			
	JBK	Jason B. Komorsky	Partner	8.8	\$675.00	\$5,940.00
	JLB	Jessica L. Bagdanov	Partner	2.0	\$575.00	\$1,150.00
	SKS	Susan K. Seflin	Partner	10.8	\$675.00	\$7,290.00
	STG	Steven T. Gubner	Equity Partner	12.5	\$895.00	\$11,187.50
	JSW	Jessica S. Wellington	Associate	0.5	\$395.00	\$197.50
	JT	Juanita Treshinsky	Paralegal	1.9	\$270.00	\$513.00
			5890.002.01 Front Sight v. Las Vegas Development Fund (Removed Action) - Subtotal	36.5		\$26,278.00
5890.002.04			Meacher Claim Objection			
	JLB	Jessica L. Bagdanov	Partner	0.3	\$575.00	\$172.50
	SKS	Susan K. Seflin	Partner	2.1	\$675.00	\$1,417.50
	JSW	Jessica S. Wellington	Associate	16.9	\$395.00	\$6,675.50
			5890.002.04 Meacher Claim Objection Subtotal	19.3		\$8,265.50
			Total Fees for Professional Services Rendered:	922.9	\$617.07	\$569,489.50

EXHIBIT 3



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EXHIBIT 3 - MONTHLY FEE SUMMARY	Sep 2022	Oct 2022	Nov 2022	Dec 2022	Total
Matter	Amount Hours	Amount Hours	Amount Hours	Amount Hours	Amount Hours
5890.002	<u>\$164,050.00</u>	<u>\$133,946.50</u>	<u>\$219,629.50</u>	<u>\$17,320.00</u>	<u>\$534,946.00</u>
Front Sight Management Ch. 11 BK 22-11824	273.7	226.2	331.2	36.0	867.1
[100] Asset Analysis & Recovery		<u>\$135.00</u>	<u>\$5,704.50</u>		<u>\$5,839.50</u>
		0.2	8.7		8.9
[110] Business Operations		<u>\$2,160.00</u>	<u>\$6,277.50</u>	<u>\$1,687.50</u>	<u>\$10,125.00</u>
		3.2	9.3	2.5	15.0
[115] Case Administration	<u>\$5,337.50</u>	<u>\$3,847.50</u>	<u>\$12,345.50</u>	<u>\$472.50</u>	<u>\$22,003.00</u>
	7.2	5.7	14.9	0.7	28.5
[120] Claims Admin	<u>\$41,477.50</u>	<u>\$33,179.00</u>	<u>\$39,316.50</u>	<u>\$451.00</u>	<u>\$114,424.00</u>
	81.0	63.7	75.1	1.0	220.8
[130] Fee/Employment Applications	<u>\$16,265.50</u>	<u>\$7,534.00</u>	<u>\$2,239.50</u>	<u>\$8,002.00</u>	<u>\$34,041.00</u>
	35.7	15.6	6.7	21.2	79.2
[135] Fee/Employment Objections	<u>\$1,338.00</u>	<u>\$237.00</u>			<u>\$1,575.00</u>
	2.8	0.6			3.4
[140] Financing	<u>\$1,730.00</u>	<u>\$2,924.50</u>		<u>\$270.00</u>	<u>\$4,924.50</u>
	2.4	4.3		0.4	7.1
[170] Plan & Disclosure Statement	<u>\$91,928.00</u>	<u>\$82,782.00</u>	<u>\$137,231.00</u>	<u>\$6,437.00</u>	<u>\$318,378.00</u>
	137.7	131.2	197.9	10.2	477.0
[180] Relief from Stay Proceedings	<u>\$5,973.50</u>				<u>\$5,973.50</u>
	6.9				6.9
[Lit] Litigation -		<u>\$1,147.50</u>	<u>\$16,515.00</u>		<u>\$17,662.50</u>
		1.7	18.6		20.3
5890.002.01	<u>\$20,328.50</u>	<u>\$4,397.00</u>	<u>\$472.50</u>	<u>\$1,080.00</u>	<u>\$26,278.00</u>
Front Sight v. Las Vegas Development Fund (Removed Action) -	27.9	6.3	0.7	1.6	36.5
5890.002.04		<u>\$7,539.50</u>	<u>\$726.00</u>		<u>\$8,265.50</u>
Meacher Claim Objection		18.1	1.2		19.3
Total	<u>\$184,378.50</u>	<u>\$145,883.00</u>	<u>\$220,828.00</u>	<u>\$18,400.00</u>	<u>\$569,489.50</u>
	301.6	250.6	333.1	37.6	922.9

EXHIBIT 4



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EXHIBIT 4 - MONTHLY COST SUMMARY	Sep 2022	Oct 2022	Nov 2022	Dec 2022	Total
<u>Component Description</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>	<u>Amount</u>
Attorney Service	\$857.15	\$1,285.05	\$523.55		\$2,665.75
Copies - Outside Vendor	\$12.20	\$166.00			\$178.20
Court Reporter or Deposition Charges	\$408.75	(\$43.60)	\$974.25		\$1,339.40
Filing Fees			\$350.00		\$350.00
Messenger or Delivery charges		\$19.04	\$20.86		\$39.90
Online Research/Download Charges	\$1,050.05	\$1,201.69	\$1,050.74		\$3,302.48
Outside Professional Services	\$2,637.50	\$250.00			\$2,887.50
Postage			\$45.00		\$45.00
Prints - Inhouse	\$99.40	\$58.80	\$275.80	\$2.80	\$436.80
Total	<u>\$5,065.05</u>	<u>\$2,936.98</u>	<u>\$3,240.20</u>	<u>\$2.80</u>	<u>\$11,245.03</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>
9/27/2022	5890.002	Outside Professional Services	Client Cost Advanced to: HOLO Discovery - Export LVDF-EB5 Disclosures to tiff/jpg Images with Load Files.	\$1,400.00

EXHIBIT 5



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EXHIBIT 5 - BIOGRAPHICAL INFORMATION

For the period from 9/1/2022 through 12/9/2022

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.

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.

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.



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EXHIBIT 5 - BIOGRAPHICAL INFORMATION

For the period from 9/1/2022 through 12/9/2022

Partner

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.

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.