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Facsimile: 619 230 0987

*Special Healthcare Regulatory Counsel for the
Chapter 11 Debtor and Debtor In Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION**

In re
BORREGO COMMUNITY HEALTH
FOUNDATION,

Debtor and Debtor in
Possession.

Case No. 22:BK-02384-11

Chapter 11

**HOOPER, LUNDY & BOOKMAN,
P.C.'S FIFTH MONTHLY FEE
APPLICATION FOR
ALLOWANCE AND PAYMENT OF
INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD JANUARY 1,
2023 THROUGH JANUARY 31,
2023**

Judge: Hon. Laura S. Taylor

HOOPER, LUNDY & BOOKMAN, P.C.
101 W. BROADWAY, SUITE 1200
SAN DIEGO, CALIFORNIA 92101
TEL (619) 744-7300 • FAX (619) 230-0987

CSD 1143 (04/28/96)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA**

DEBTOR: Borrego Community
Health Foundation
CASE NO.: 22:BK-02384-11

PETITION DATE: September 12, 2022

MONTHLY FEE APPLICATION SUMMARY

APPLICANT: Hooper, Lundy &
Bookman, P.C.

REPRESENTING: Borrego Community
Health Foundation

ORDER APPROVING EMPLOYMENT: Docket No. 198

CATEGORIES	<u>1/1/2023-1/31/2023 (APPLICATION PERIOD)</u>	
	HOURS	AMOUNT REQUESTED
Administration ¹	173.2	\$116,915.60
Operations		
Claims and Plan		
General Bankruptcy		
Disbursement Costs		\$7,230.42
TOTALS:		\$124,146.02

MONTHLY FEE APPLICATION

Hooper, Lundy & Bookman, P.C. (the “Firm”) submits its Monthly Fee Application (the “Application”) for Allowance and Payment of Interim Compensation and Reimbursement of Expenses for postpetition fees and the fifth application period of January 1, 2023 through January 31, 2023 (the “Application Period”) for work performed during the chapter 11 case (this “Case”) of the above-

¹ Includes bankruptcy administration, DHCS dispute, and Lease and Premier litigation.

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captioned debtor (the “Debtor”). In support of the Application, the Firm respectfully represents as follows:

1. The Firm is counsel to the Debtor. It is representing the Debtor in several legal matters, including, but not limited to, defending an ongoing government investigation and issues related to it, including, compliance, operations, and Medi-Cal suspension efforts (Matter 906), representing the Debtor in litigation initiated by Dr. Aldairi (Matter 908), representing the Debtor in litigation against its former claims manager, former executives, and formerly contracted dentists (Matter 909), representing the Debtor with ongoing issues with a prepetition sale of certain assets (Matter 911), representing the Debtor for certain Medi-Cal audit appeals (Matter 913), acting as special regulatory counsel in this bankruptcy matter (Matter 914), and representing the Debtor in litigation against its landlord (Matter 915). A detailed accounting of the work done for each matter is attached in Exhibit 2.

2. The Firm hereby applies to the Court for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the Application Period.

3. The Firm agreed to a 20% reduction on billed fees to the Debtor pursuant to a fee agreement, which is reflected in the billing on this Application.

4. The Firm billed a total of \$124,146.02 in fees and expenses during the Application Period. The total fees represent 173.2 hours expended during the period covered by this Application. These fees and expenses break down as follows:

Application Period	Fees	Expenses	Total
1/1/2023-1/31/2023	\$116,915.60	\$7,230.42	\$124,146.02

5. Accordingly, the Firm seeks allowance of interim compensation in the amount of a total of \$100,762.90 at this time. This total is comprised as follows: \$93,532.48 (80% of the fees for services rendered), plus \$7,230.42 (100% of the expenses incurred).

6. Attached as Exhibit “1” hereto is the name of each professional who performed services in connection with these matters during the period covered by this Application and hourly rate for each such professional when the 20% fee agreement discount is applied. Attached hereto as Exhibit “2” are the detailed time and expense statements for the Application Period, which were billed pursuant to the fee agreement at a 20% discount.

7. The Firm has served a copy of this Application on the Office of the United States Trustee (the “U.S. Trustee”), the Debtor, counsel to the Debtor, counsel to the Patient Care Ombudsman, and counsel to the Official Committee of Unsecured Creditors appointed in this Case. The Application was mailed by first class mail, postage prepaid, on or about March 15, 2023. Notice of the filing of this Application was served on the foregoing parties as well as any party who has requested special notice in this Case as of the date of the Notice. The Notice was mailed by first class mail, postage prepaid, on or about March 15, 2023.

8. Pursuant to this Court’s *Order On Debtor’s Motion Establishing Procedures For Monthly Payment Of Fees And Expense* that was entered on or about December 7, 2022 (the “Order Establishing Monthly Fee Procedures”) [Docket No. 282] the Debtor is authorized to make the payment requested herein without a further hearing or order of this Court unless an objection to this Application is filed with the Court and served upon the Notice Parties within ten (10) calendar days after the date of mailing of the Notice of this Application. If such an objection is filed, the Debtor is authorized to pay 80% of the uncontested fees and 100% of the uncontested expenses without further order of the Court. If no objection is filed, the Debtor is authorized to pay 80% of all fees requested in the Application and 100% of the uncontested expenses without further order of the Court.

9. The interim compensation and reimbursement of expenses sought in this Application is not final. Upon the conclusion of this Case, the Firm will seek

HOOPER, LUNDY & BOOKMAN, P.C.’S FIFTH MONTHLY FEE APPLICATION FOR ALLOWANCE & PAYMENT OF INTERIM COMPENSATION & REIMBURSEMENT OF EXPENSES FOR THE PERIOD JANUARY 1, 2023 THROUGH JANUARY 31, 2023

1 fees and reimbursement of the expenses incurred for the totality of the services
2 rendered in this Case. Any interim fees or reimbursement of expenses approved by
3 this Court and received by the Firm (along with any retainer) will be credited against
4 such final fees and expenses as may be allowed by this Court.

5 **WHEREFORE**, the Firm respectfully requests that the Debtor pay
6 compensation to the Firm as requested herein pursuant to and in accordance with the
7 terms of the Order Establishing Monthly Fee Procedures.

8
9 DATED: March 15, 2023

HOOPER, LUNDY & BOOKMAN, P.C.

10
11
12 By:


JOSEPH R. LAMAGNA

13 Special Healthcare Regulatory Counsel for the
14 Chapter 11 Debtor and Debtor In Possession
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EXHIBIT “1”**(Summary of Hours by Professional for Application Period 1/1/2023-1/31/2023)**

Name of Professional	Title	Hours	Rate	Total Billed
Patrick Davoodi	Paralegal	1.1	\$364.00	\$400.40
Andrea Frey	Associate	5.4	\$724.00	\$3,909.60
Cole Hoyt	Associate	3.3	\$540.00	\$1,782.00
David Hatch	Partner	0.1	\$792.00	\$79.20
Devin Senelick	Partner	43.1	\$792.00	\$34,135.20
Nina Marsden	Partner	0.2	\$788.00	\$157.60
Katrina Pagonis	Partner	0.5	\$788.00	\$394.00
Jordan Kearney	Partner	16.6	\$756.00	\$12,549.60
Jeffrey Lin	Associate	8.6	\$580.00	\$4,988.00
Joseph LaMagna	Partner	18.8	\$788.00	\$14,814.40
Maydha Vinson	Associate	9.1	\$476.00	\$4,331.60
Matthew Lahana	Associate	1.5	\$724.00	\$1,086.00
Herby Preval	Litigation Support	0.1	\$288.00	\$28.80
Aida Ramos	Paralegal	2.2	\$388.00	\$853.60
Stanton Stock	Partner	5.6	\$776.00	\$4,345.60
Taryn Reid	Associate	57	\$580.00	\$33,060.00
Totals:		173.2		\$116,915.60

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EXHIBIT “2”

(Detailed Time and Expense Statements for Application Period 1/1/2023-1/31/2023)

HOOVER, LUNDY & BOOKMAN, P.C.
101 W. BROADWAY, SUITE 1200
SAN DIEGO, CALIFORNIA 92101
TEL (619) 744-7300 • FAX (619) 230-0987



1875 Century Park East
Suite 1600
Los Angeles, CA 90067
T: 310.551.8111
Tax ID Number: 95-4109805

Borrego Health
Rose Macisaac
P.O. Box 2369
Borrego Springs, CA 92004

Invoice Date: February 27, 2023
Invoice Number: 304282
JRL

INVOICE TOTAL \$ 49,909.39

10335 Borrego Health
909 Premier Litigation

Professional Services Rendered Through January 31, 2023

TOTAL FEES THIS INVOICE	62,112.50
Less 20% Discount	(12,422.50)
NET TOTAL FEES THIS INVOICE	49,690.00
TOTAL DISBURSEMENTS THIS INVOICE	219.39
CURRENT INVOICE TOTAL	\$ 49,909.39
PREVIOUS OUTSTANDING BALANCE FOR THIS MATTER	116,391.20
TOTAL AMOUNT DUE	\$ 166,300.59

*****PAYMENT DUE IN 10 DAYS*****

Please Use One of our Convenient Payment Options

Payment via ACH:	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Reference: Please include invoice number
Payment via Wire: (bank wire fees may apply)	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Bank Address: 2029 Century Park East, Suite 800, Los Angeles, CA 90067 Reference: Please include invoice number
Payment via Check:	Hooper, Lundy & Bookman, PC 1875 Century Park East, Suite 1600 Los Angeles, CA 90067



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10335
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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/02/2023	JRL	Review and analyze motion and opposition to BCHF's Motion/Application for Order Directing Auditor/Controller to Draw Warrant	0.80	788.00
01/03/2023	DMS	Plan and prepare for litigation next steps, upcoming hearing and discovery	0.80	792.00
01/03/2023	TAR	Strategize re 26(f) conference and motion for leave to amend	0.40	290.00
01/04/2023	DMS	Prepare for and meeting with bankruptcy counsel re interpleader funds, settlement process	1.10	1,089.00
01/04/2023	TAR	Strategize re settlement offers	0.30	217.50
01/05/2023	DMS	Plan and prepare for litigation budget issues, request from counsel re same	0.40	396.00
01/06/2023	TAR	Prepare communications chart re settlement discussions	1.10	797.50
01/09/2023	DMS	Plan and prepare for settlement, discovery issues	1.40	1,386.00
01/09/2023	DMS	Review and analyze data re dental claims, fraud "scores"	1.00	990.00
01/09/2023	DMS	Draft and send email to client summarizing various issues, status and strategy	0.50	495.00
01/09/2023	TAR	Prepare e-mail to N. Venugopal re patient records	0.10	72.50
01/09/2023	TAR	Strategize re settlement offers	0.30	217.50
01/09/2023	TAR	Strategize re review and production of e-discovery	0.10	72.50
01/09/2023	TAR	Continue to prepare chart re settlement communication	0.40	290.00
01/09/2023	TAR	Prepare chart re patient records and discovery requests	1.00	725.00
01/09/2023	TAR	Review e-mail to Borrego re status of litigation	0.10	72.50
01/09/2023	TAR	Review dental services agreements	0.10	72.50
01/10/2023	JCK	Call with I. Lee re bids and next steps with DHCS	0.40	378.00
01/10/2023	DMS	Prepare for and meeting with client re status of litigation matters	1.10	1,089.00
01/12/2023	TAR	Review e-mail from M. Tusio	0.10	72.50
01/12/2023	TAR	Prepare and review e-mail from C. Jeng re settlement	0.10	72.50
01/13/2023	JCK	Analyze HIPAA issue raised by dentists refusing to provide records	0.40	378.00



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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/13/2023	DMS	Plan and prepare for litigation budget, communication with client re same	2.10	2,079.00
01/13/2023	DMS	Email correspondence with counsel, client re budget issues, next steps, meeting	0.40	396.00
01/13/2023	TAR	Prepare budget re motions to dismiss	0.10	72.50
01/13/2023	TAR	Prepare reply to opposition to motion for leave to amend	2.90	2,102.50
01/17/2023	JCK	Call with client re litigation budget and documentation for creditors committee	0.40	378.00
01/17/2023	JRL	Meeting with D. Habig re litigation update and budgeting	0.50	492.50
01/17/2023	JRL	Revise budget estimates and litigation outline	0.30	295.50
01/17/2023	DMS	Prepare for and meeting with client re budget	0.60	594.00
01/17/2023	DMS	Draft, review and revise budget memorandum, spreadsheet	2.20	2,178.00
01/18/2023	JCK	Strategy discussion about prediscovery factual development	1.00	945.00
01/18/2023	JRL	Outline potential internal discovery plan	0.40	394.00
01/18/2023	JRL	Strategize with D. Senelick, J. Kearney, and T. Reid re discovery plan	0.40	394.00
01/18/2023	DMS	Plan and prepare litigation, discovery strategy and budget for same	2.20	2,178.00
01/18/2023	TAR	Strategize re litigation strategy, including discovery	1.30	942.50
01/19/2023	DMS	Email correspondence with client re budget issues, patient contact	0.50	495.00
01/19/2023	TAR	Strategize re e-discovery	1.00	725.00
01/19/2023	TAR	Prepare litigation strategy re document review and production	0.40	290.00
01/23/2023	JRL	Virtual meeting with T. Reid and D. Senelick re open action items	0.60	591.00
01/23/2023	TAR	Strategize re e-discovery	0.10	72.50
01/23/2023	TAR	Review e-mail from M. Tuso's counsel	0.10	72.50
01/24/2023	DMS	Email correspondence with counsel re discovery issues, funding sources, etc.	0.60	594.00
01/24/2023	DMS	Plan and prepare for Rule 26 compliance, conferences	1.50	1,485.00
01/24/2023	DMS	Email correspondence with all counsel re Rule 26 conferences, status and schedule	1.40	1,386.00
01/24/2023	MIL	Phone conference w/ D. Senelick re interpleader	0.30	271.50



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Premier Litigation

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/24/2023	TAR	Prepare e-mail to M. Tusso's counsel	0.20	145.00
01/24/2023	TAR	Review e-mail from Dr. Hawatmeh's counsel	0.10	72.50
01/24/2023	TAR	Strategize e e-discovery	0.50	362.50
01/24/2023	TAR	Strategize re fact development and discovery	1.00	725.00
01/24/2023	TAR	Prepare e-mail to N. Venugopal re patient records	0.10	72.50
01/24/2023	TAR	Analysis re HIPAA and authorization issues re release of patient records	0.20	145.00
01/25/2023	JCK	Prepare for 26(f) conferences	0.40	378.00
01/25/2023	JRL	Review correspondence with opposing counsel re 26(f) conference	0.10	98.50
01/25/2023	DMS	Draft and revise Rule 26 report, stipulation for extension	1.50	1,485.00
01/25/2023	DMS	Plan and prepare for Rule 26 conferences with all defendants, including email correspondence	4.70	4,653.00
01/25/2023	DMS	Prepare for and Rule 26 Conference with first set of defendants	0.80	792.00
01/25/2023	TAR	Review e-mail from K. Rutman re 26(f) conference	0.10	72.50
01/25/2023	TAR	Review e-mails from defense counsel re 26(f) conference and prepare e-service list re same	1.10	797.50
01/25/2023	TAR	Prepare protective order	0.10	72.50
01/25/2023	TAR	Prepare for 26(f) conference; attend 26(f) conference	2.70	1,957.50
01/25/2023	TAR	Prepare e-mail to S. Hansberger re e-discovery	0.10	72.50
01/25/2023	TAR	Prepare stipulation to continue the ENE and CMC	0.70	507.50
01/26/2023	DMS	Email correspondence with counsel re Rule 26 conferences, schedule, related issues	1.60	1,584.00
01/26/2023	TAR	Review e-mails from defense counsel re joint motion to magistrate judge	0.20	145.00
01/26/2023	TAR	Strategize re joint motion to extend	0.20	145.00
01/27/2023	DMS	Telephone conference with counsel for Dr. Velasquez re status, possible settlement	0.60	594.00
01/27/2023	DMS	Plan and prepare for Rule 26 conferences and related deadlines	0.80	792.00
01/27/2023	DMS	Email correspondence and telephone conferences with counsel re Rule 26 conferences and related deadlines, proposed joint motion/stipulation	2.30	2,277.00
01/27/2023	MIL	Draft Federal Interpleader	1.20	1,086.00
01/27/2023	TAR	Strategize and prepare for 26(f) conferences and discovery	1.30	942.50



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Premier Litigation

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/27/2023	TAR	Review e-mail to and from co-defendants re 26(f) and discovery	0.70	507.50
01/27/2023	TAR	Prepare e-mail to C. Jeng re settlement	0.10	72.50
01/27/2023	TAR	Analysis re potential use of consultants	0.10	72.50
01/27/2023	TAR	Prepare e-mail re proposed continuance schedule of discovery	0.10	72.50
01/27/2023	TAR	Prepare e-mail to D. Baldwin re pst data	0.40	290.00
01/27/2023	TAR	Prepare stipulation to continue ENE and CMC	0.30	217.50
01/27/2023	TAR	Prepare e-mail to S. Hansberger re discovery	0.10	72.50
01/27/2023	TAR	Call with C. Jeng	0.20	145.00
01/27/2023	TAR	Prepare proposed order re stipulation and joint motion to continue CMC and ENE	0.30	217.50
01/30/2023	JRL	Strategize with D. Senelick and J. Kearney re potential settlement methodologies, 26(f) conferences, and open discovery plan	1.40	1,379.00
01/30/2023	JRL	Review joint motion re 26(f)	0.20	197.00
01/30/2023	DMS	Plan and prepare for investigation, settlement analysis	1.30	1,287.00
01/30/2023	DMS	Prepare for and Rule 26 conference with two defendants	0.70	693.00
01/30/2023	DMS	Review and analyze court order re extension of discovery, ENE deadlines	0.40	396.00
01/30/2023	TAR	Analysis re settlement calculations	1.80	1,305.00
01/30/2023	TAR	Review and prepare e-mails to and from counsel for D. Thompson	0.10	72.50
01/30/2023	TAR	Prepare e-mail to D. Baldwin re data collection	0.10	72.50
01/30/2023	TAR	Attend 26(f) Conference	0.60	435.00
01/30/2023	TAR	Review court order re continuance of 26(f) conference and corresponding discovery; prepare e-mail to parties re same	0.10	72.50
01/30/2023	TAR	Prepare litigation status update	0.20	145.00
01/30/2023	A R	Research criminal cases in Riverside and San Diego county for Attorney review.	2.20	1,067.00
01/31/2023	DMS	Email correspondence with client re potential analysis tool for dentist settlement, pleadings	0.60	594.00
01/31/2023	CMH	Draft and revise protective order regarding PHI and HIPAA.	2.10	1,417.50
01/31/2023	TAR	Review status of criminal cases	0.20	145.00
01/31/2023	TAR	Prepare e-mail to Borrego re use of consultants	0.10	72.50



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909 Premier Litigation

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/31/2023	TAR	Prepare protective order	0.30	217.50
01/31/2023	TAR	Strategize re e-discovery platforms and PST data review	1.00	725.00
TOTAL HOURS AND FEES			71.60	\$ 62,112.50
LESS 20% DISCOUNT				(12,422.50)
NET TOTAL DUE				\$ 49,690.00

TIMEKEEPER SUMMARY:

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>BILLED HOURS</u>	<u>BILLED RATE</u>	<u>BILLED AMOUNT</u>
Devin Senelick	Partner	33.10	792.00	26,215.20
Joseph LaMagna	Partner	4.70	788.00	3,703.60
Jordan Kearney	Partner	2.60	756.00	1,965.60
Matthew Lahana	Senior Counsel	1.50	724.00	1,086.00
Taryn Reid	Associate	25.40	580.00	14,732.00
Cole Hoyt	Associate	2.10	540.00	1,134.00
Aida Ramos	Paralegal	2.20	388.00	853.60
PRE-DISCOUNTED TOTAL		71.60		\$ 62,112.50
LESS 20% DISCOUNT				(12,422.50)
NET TOTAL DUE				\$ 49,690.00

DISBURSEMENTS:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Attorney Service	



Invoice Date: February 27, 2023

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909 Premier Litigation

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
01/01/2023	Vendor: Nationwide Legal, LLC; Invoice#: 51182; Date: 12/5/2022 - SD 2039	219.39
		219.39
TOTAL DISBURSEMENTS		\$ 219.39

TOTAL AMOUNT DUE FOR THIS INVOICE	\$ 49,909.39
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1875 Century Park East
Suite 1600
Los Angeles, CA 90067
T: 310.551.8111
Tax ID Number: 95-4109805

REMITTANCE AND PAYMENT INSTRUCTIONS

Borrego Health
Rose Macisaac, CFO
P.O. Box 2369
Borrego Springs, CA 92004

Invoice Date: February 27, 2023
Invoice Number: 304282
JRL

INVOICE TOTAL \$ 49,909.39

10335 **Borrego Health**
909 **Premier Litigation**

TOTAL AMOUNT DUE FOR THIS INVOICE	\$ 49,909.39
PREVIOUS OUTSTANDING BALANCE FOR THIS MATTER	116,391.20
TOTAL AMOUNT DUE	\$ 166,300.59

*****PAYMENT DUE IN 10 DAYS*****

Please Use One of our Convenient Payment Options	
Payment via ACH:	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Reference: Please include invoice number
Payment via Wire: (bank wire fees may apply)	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Bank Address: 2029 Century Park East, Suite 800, Los Angeles, CA 90067 Reference: Please include invoice number
Payment via Check:	Hooper, Lundy & Bookman, PC 1875 Century Park East, Suite 1600 Los Angeles, CA 90067



1875 Century Park East
Suite 1600
Los Angeles, CA 90067
T: 310.551.8111
Tax ID Number: 95-4109805

Borrego Health
Rose Macisaac
P.O. Box 2369
Borrego Springs, CA 92004

Invoice Date: February 27, 2023
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JRL

INVOICE TOTAL \$ 25,652.60

10335 Borrego Health
915 Lease Litigation

Professional Services Rendered Through January 31, 2023

TOTAL FEES THIS INVOICE	32,062.00
Less 20% Discount	(6,412.40)
NET TOTAL FEES THIS INVOICE	25,649.60
TOTAL DISBURSEMENTS THIS INVOICE	3.00
CURRENT INVOICE TOTAL	\$ 25,652.60
PREVIOUS OUTSTANDING BALANCE FOR THIS MATTER	15,441.60
TOTAL AMOUNT DUE	\$ 41,094.20

*****PAYMENT DUE IN 10 DAYS*****

Please Use One of our Convenient Payment Options

Payment via ACH:	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Reference: Please include invoice number
Payment via Wire: (bank wire fees may apply)	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Bank Address: 2029 Century Park East, Suite 800, Los Angeles, CA 90067 Reference: Please include invoice number
Payment via Check:	Hooper, Lundy & Bookman, PC 1875 Century Park East, Suite 1600 Los Angeles, CA 90067



Invoice Date: February 27, 2023

Invoice Number: 304281

JRL

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10335
915Borrego Health
Lease Litigation**PROFESSIONAL SERVICES RENDERED:**

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/2023	DMS	Plan and prepare for litigation next steps, interpleaded funds	0.80	792.00
01/03/2023	CMH	Research interpleader rules under CA and local rules.	1.20	810.00
01/03/2023	TAR	Review and evaluate arguments raised in Premier Defendants' opposition to Borrego's Motion to Deposit Money re interpleader action	1.80	1,305.00
01/03/2023	TAR	Strategize re interpleader and current status of damages	0.40	290.00
01/03/2023	TAR	Prepare e-mail to G. Hatton re status of leases	0.10	72.50
01/03/2023	TAR	Prepare e-mail to bankruptcy counsel re interpleader action	0.10	72.50
01/04/2023	DMS	Review and analyze issues relating to lease litigation, interpleader matter, cross-claim	0.80	792.00
01/04/2023	TAR	Prepare and review e-mails to and from G. Hatten re interpleader action	0.40	290.00
01/04/2023	TAR	Strategize re interpleader hearing	0.10	72.50
01/04/2023	TAR	Prepare client summary of lease litigation and litigation strategies	1.60	1,160.00
01/04/2023	TAR	Strategy call with bankruptcy counsel re interpleader action	0.40	290.00
01/04/2023	TAR	Prepare and review e-mails to and from bankruptcy counsel re interpleader	0.20	145.00
01/05/2023	TAR	Prepare litigation summary and strategy re interpleader and lease litigation	1.10	797.50
01/06/2023	DMS	Email correspondence with counsel re interpleader action/funds, next steps	0.40	396.00
01/06/2023	TAR	Prepare and review e-mail to and from bankruptcy counsel re interpleader action	0.20	145.00
01/06/2023	TAR	Call and e-mail with G. Hatton re reply in interpleader action	0.60	435.00
01/06/2023	TAR	Review lease litigation and prepare litigation strategy and client summary re same	2.00	1,450.00
01/09/2023	JRL	Strategize with D. Senelick and J. Kearney re interpleader action and potential impact on litigation	0.70	689.50
01/09/2023	DMS	Review and analyze reply brief re interplead funds	0.40	396.00



Invoice Date: February 27, 2023

Invoice Number: 304281

JRL

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915Borrego Health
Lease Litigation

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/09/2023	DMS	Email correspondence and telephone conference with counsel, client re interplead funds, budget for matter, status	0.90	891.00
01/09/2023	DMS	Plan and prepare for interpleader issues, motion for leave to amend	0.70	693.00
01/09/2023	DMS	Draft and send email to client summarizing various issues, status and strategy	0.50	495.00
01/09/2023	TAR	Read and review e-mail from G. Hatton re reply to opposition to Borrego's motion to release interpleader funds	0.20	145.00
01/09/2023	TAR	Read and review Premier defendant's opposition to Borrego's motion for leave to amend	0.70	507.50
01/09/2023	TAR	Prepare e-mail to bankruptcy counsel re reply to opposition to Borrego's motion to release interpleader funds	0.10	72.50
01/09/2023	TAR	Review e-mails to and from bankruptcy counsel re fees associated with interpleader hearing	0.10	72.50
01/09/2023	TAR	Read and review reply to opposition to Borrego's motion to release interpleader funds	0.30	217.50
01/10/2023	TAR	Prepare outline to reply brief	1.90	1,377.50
01/11/2023	TAR	Prepare outline to reply to opposition to motion for leave to amend	2.10	1,522.50
01/12/2023	DMS	Review and analyze tentative ruling re interplead funds	0.50	495.00
01/12/2023	TAR	Strategize re reply to opposition to motion to dismiss	1.10	797.50
01/12/2023	TAR	Read and review tentative ruling re motion for release of funds	0.10	72.50
01/12/2023	TAR	Prepare e-mail to bankruptcy counsel re tentative ruling	0.20	145.00
01/16/2023	TAR	Prepare reply to opposition to motion for leave to amend	7.10	5,147.50
01/17/2023	TAR	Prepare reply to opposition to motion for leave to amend	1.30	942.50
01/19/2023	DMS	Plan and prepare for reply brief re motion for leave to amend pleading	1.10	1,089.00
01/19/2023	DMS	Review and analyze draft reply brief	0.70	693.00
01/19/2023	TAR	Prepare reply to opposition to motion for leave to amend	3.90	2,827.50
01/20/2023	DMS	Draft, review, revise and finalize reply brief in support of motion for leave to amend	3.20	3,168.00



Invoice Date: February 27, 2023

Invoice Number: 304281

JRL

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10335 Borrego Health
915 Lease Litigation

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/20/2023	TAR	Prepare reply to motion for leave to amend	0.30	217.50
01/23/2023	TAR	Prepare e-mail to G. Hatton re motion for release of interpleader funds	0.10	72.50
TOTAL HOURS AND FEES			40.40	\$ 32,062.00
LESS 20% DISCOUNT				(6,412.40)
NET TOTAL DUE				\$ 25,649.60

TIMEKEEPER SUMMARY:

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>BILLED HOURS</u>	<u>BILLED RATE</u>	<u>BILLED AMOUNT</u>
Devin Senelick	Partner	10.00	792.00	7,920.00
Joseph LaMagna	Partner	0.70	788.00	551.60
Taryn Reid	Associate	28.50	580.00	16,530.00
Cole Hoyt	Associate	1.20	540.00	648.00
PRE-DISCOUNTED TOTAL		40.40		\$ 32,062.00
LESS 20% DISCOUNT				(6,412.40)
NET TOTAL DUE				\$ 25,649.60

DISBURSEMENTS:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
Costs Advanced		
01/17/2023	Vendor: Griselda Rodriguez; Invoice#: 01.17.23.; Date: 1/17/2023 - San Diego Superior Court - Copy of Proposed Order	3.00
		3.00



Invoice Date: February 27, 2023

Invoice Number: 304281

JRL

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10335 Borrego Health
915 Lease Litigation

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
TOTAL DISBURSEMENTS		<u>\$ 3.00</u>

TOTAL AMOUNT DUE FOR THIS INVOICE	\$ 25,652.60
-----------------------------------	--------------



1875 Century Park East
Suite 1600
Los Angeles, CA 90067
T: 310.551.8111
Tax ID Number: 95-4109805

REMITTANCE AND PAYMENT INSTRUCTIONS

Borrego Health
Rose Macisaac, CFO
P.O. Box 2369
Borrego Springs, CA 92004

Invoice Date: February 27, 2023
Invoice Number: 304281
JRL

INVOICE TOTAL \$ 25,652.60

10335 **Borrego Health**
915 **Lease Litigation**

TOTAL AMOUNT DUE FOR THIS INVOICE	\$ 25,652.60
PREVIOUS OUTSTANDING BALANCE FOR THIS MATTER	15,441.60
TOTAL AMOUNT DUE	\$ 41,094.20

*****PAYMENT DUE IN 10 DAYS*****

Please Use One of our Convenient Payment Options	
Payment via ACH:	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Reference: Please include invoice number
Payment via Wire: (bank wire fees may apply)	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Bank Address: 2029 Century Park East, Suite 800, Los Angeles, CA 90067 Reference: Please include invoice number
Payment via Check:	Hooper, Lundy & Bookman, PC 1875 Century Park East, Suite 1600 Los Angeles, CA 90067



1875 Century Park East
Suite 1600
Los Angeles, CA 90067
T: 310.551.8111
Tax ID Number: 95-4109805

Borrego Health
Rose Macisaac
P.O. Box 2369
Borrego Springs, CA 92004

Invoice Date: February 27, 2023
Invoice Number: 304280
JRL

INVOICE TOTAL \$ 15,675.20

10335 **Borrego Health**
914 **Regulatory Counsel - Bankruptcy**
Electronic Billing Number: 10335.914

Professional Services Rendered Through January 31, 2023

TOTAL FEES THIS INVOICE	19,594.00
Less 20% Discount	(3,918.80)
NET TOTAL FEES THIS INVOICE	15,675.20
CURRENT INVOICE TOTAL	\$ 15,675.20
PREVIOUS OUTSTANDING BALANCE FOR THIS MATTER	52,470.16
TOTAL AMOUNT DUE	\$ 68,145.36

*****PAYMENT DUE IN 10 DAYS*****

Please Use One of our Convenient Payment Options

Payment via ACH:	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Reference: Please include invoice number
Payment via Wire: (bank wire fees may apply)	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Bank Address: 2029 Century Park East, Suite 800, Los Angeles, CA 90067 Reference: Please include invoice number
Payment via Check:	Hooper, Lundy & Bookman, PC 1875 Century Park East, Suite 1600 Los Angeles, CA 90067



Invoice Date: February 27, 2023

Invoice Number: 304280

JRL

Page 2

10335

Borrego Health

914

Regulatory Counsel - Bankruptcy

PROFESSIONAL SERVICES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/2023	JCK	Legal status update call with client and bankruptcy counsel	0.30	283.50
01/09/2023	JCK	Internal call to coordinate open projects	1.00	945.00
01/10/2023	JCK	Call with J. LaMagna re outstanding tasks and next steps	0.30	283.50
01/10/2023	JCK	Legal status update call with client and bankruptcy counsel	0.80	756.00
01/10/2023	JRL	Telephone correspondence with client and BK counsel re open legal items	0.70	689.50
01/13/2023	JRL	Telephone correspondence with E. Balfour re bid inquiry	0.40	394.00
01/17/2023	JCK	Call with client and bankruptcy counsel re status and next steps	1.10	1,039.50
01/17/2023	JRL	Telephone correspondence with BK counsel and management team re IOIs and mediation	1.00	985.00
01/18/2023	JRL	Email correspondence with BK counsel re fee application and review same and propose revisions to same	0.50	492.50
01/18/2023	MBV	Retrieving and compiling contract medical records requested by DHCS re prior Wipfli audit	1.30	773.50
01/23/2023	JCK	Research re nonprofit status	0.30	283.50
01/23/2023	JCK	Internal call re status of outstanding projects and next steps	0.50	472.50
01/23/2023	JCK	Follow up emails re document production to DHCS	0.20	189.00
01/23/2023	JRL	Review fee application for potential revisions	0.20	197.00
01/24/2023	JRL	Review settlement illustration and cost breakdown and communications with mediator and	0.40	394.00
01/24/2023	JRL	Telephone correspondence with client and BK counsel re mediation and bankruptcy strategy	1.00	985.00
01/24/2023	JRL	Email correspondence with BK counsel re mediation and tolling agreements	0.40	394.00
01/25/2023	JCK	Review and revise email re status of 2019-2021 audits and coordinate with bankruptcy counsel re the same	1.80	1,701.00
01/25/2023	JCK	Analysis of research on appeal process after 330 grant award	0.60	567.00
01/25/2023	JRL	Email correspondence re Department motion and impact of stay/tolling agreement	0.80	788.00



Invoice Date: February 27, 2023

Invoice Number: 304280

JRL

Page 3

10335

Borrego Health

914

Regulatory Counsel - Bankruptcy

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/25/2023	JRL	Strategize with J. Kearney and S. Stock re audit appeal deadlines and impact of DHCS request	0.50	492.50
01/25/2023	NAM	Call with J. Kearney and M. Vinson re appeal process for HRSA's failure to timely renew Section 330 grant	0.20	197.00
01/25/2023	KAP	Analyze Section 330 grants and possible appeal avenues with J. Kearney	0.50	492.50
01/25/2023	MBV	Researching statutory, regulatory and HRSA guidance on appeal options available for termination of Section 330 grant	3.20	1,904.00
01/25/2023	MBV	Reviewing HRSA grant research with J. Kearney and N. Marsden	0.30	178.50
01/26/2023	JCK	Analysis of research on HRSA appeal process	0.20	189.00
01/26/2023	MBV	Researching possible APA challenges to grant nonrenewal	2.40	1,428.00
01/26/2023	MBV	Drafting summary correspondence on administrative and non-administrative options for appeal to HRSA	1.90	1,130.50
01/31/2023	DAH	Review and analyze issues re California Attorney General nonprofit compliance and filings	0.10	99.00
01/31/2023	TAR	Prepare summary of litigation	1.10	797.50
01/31/2023	TAR	Prepare fee application for December 2022	0.10	72.50
TOTAL HOURS AND FEES			24.10	\$ 19,594.00
LESS 20% DISCOUNT				(3,918.80)
NET TOTAL DUE				\$ 15,675.20



Invoice Date: February 27, 2023

Invoice Number: 304280

JRL

Page 4

10335
914

Borrego Health
Regulatory Counsel - Bankruptcy

TIMEKEEPER SUMMARY:

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>BILLED HOURS</u>	<u>BILLED RATE</u>	<u>BILLED AMOUNT</u>
David Hatch	Partner	0.10	792.00	79.20
Joseph LaMagna	Partner	5.90	788.00	4,649.20
Nina Marsden	Partner	0.20	788.00	157.60
Katrina Pagonis	Partner	0.50	788.00	394.00
Jordan Kearney	Partner	7.10	756.00	5,367.60
Taryn Reid	Associate	1.20	580.00	696.00
Maydha Vinson	Associate	9.10	476.00	4,331.60
PRE-DISCOUNTED TOTAL		24.10		\$ 19,594.00
LESS 20% DISCOUNT				(3,918.80)
NET TOTAL DUE				\$ 15,675.20

TOTAL AMOUNT DUE FOR THIS INVOICE

\$ 15,675.20



1875 Century Park East
Suite 1600
Los Angeles, CA 90067
T: 310.551.8111
Tax ID Number: 95-4109805

REMITTANCE AND PAYMENT INSTRUCTIONS

Borrego Health
Rose Macisaac, CFO
P.O. Box 2369
Borrego Springs, CA 92004

Invoice Date: February 27, 2023
Invoice Number: 304280
JRL

INVOICE TOTAL \$ 15,675.20

10335 **Borrego Health**
914 **Regulatory Counsel - Bankruptcy**
Electronic Billing Number: 10335.914

TOTAL AMOUNT DUE FOR THIS INVOICE	\$ 15,675.20
PREVIOUS OUTSTANDING BALANCE FOR THIS MATTER	52,470.16
TOTAL AMOUNT DUE	\$ 68,145.36

*****PAYMENT DUE IN 10 DAYS*****

Please Use One of our Convenient Payment Options	
Payment via ACH:	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Reference: Please include invoice number
Payment via Wire: (bank wire fees may apply)	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Bank Address: 2029 Century Park East, Suite 800, Los Angeles, CA 90067 Reference: Please include invoice number
Payment via Check:	Hooper, Lundy & Bookman, PC 1875 Century Park East, Suite 1600 Los Angeles, CA 90067



1875 Century Park East
Suite 1600
Los Angeles, CA 90067
T: 310.551.8111
Tax ID Number: 95-4109805

Borrego Health
Rose Macisaac
P.O. Box 2369
Borrego Springs, CA 92004

Invoice Date: February 27, 2023
Invoice Number: 304284
JRL

INVOICE TOTAL \$ 22,516.83

10335 Borrego Health
906 DOJ Investigation

Professional Services Rendered Through January 31, 2023

TOTAL FEES THIS INVOICE	19,386.00
Less 20% Discount	(3,877.20)
NET TOTAL FEES THIS INVOICE	15,508.80
TOTAL DISBURSEMENTS THIS INVOICE	7,008.03
CURRENT INVOICE TOTAL	\$ 22,516.83
PREVIOUS OUTSTANDING BALANCE FOR THIS MATTER	17,148.83
TOTAL AMOUNT DUE	\$ 39,665.66

*****PAYMENT DUE IN 10 DAYS*****

Please Use One of our Convenient Payment Options

Payment via ACH:	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Reference: Please include invoice number
Payment via Wire: (bank wire fees may apply)	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Bank Address: 2029 Century Park East, Suite 800, Los Angeles, CA 90067 Reference: Please include invoice number
Payment via Check:	Hooper, Lundy & Bookman, PC 1875 Century Park East, Suite 1600 Los Angeles, CA 90067



Invoice Date: February 27, 2023

Invoice Number: 304284

JRL

Page 2

10335
906Borrego Health
DOJ Investigation**PROFESSIONAL SERVICES RENDERED:**

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/09/2023	JCK	Call with D. Erwin re access to medical records for DHCS	0.20	189.00
01/09/2023	JCK	Analysis of HIPAA concern re granting access to medical records to DHCS	0.40	378.00
01/09/2023	JRL	Telephone correspondence with Monitor re DHCS oversight	0.40	394.00
01/09/2023	JRL	Investigate referral timing calculations, including email and telephone correspondence with Giovanna re same to answer monitor questions	0.80	788.00
01/09/2023	JRL	Review interpleader summary of pleadings from T. Reid	0.20	197.00
01/09/2023	JRL	Email update to client re meeting with monitor	0.30	295.50
01/09/2023	ALF	Strategize ability to share access to medical records with DHCS for purposes of record audit under applicable health privacy laws.	0.40	362.00
01/09/2023	TAR	Prepare agenda of outstanding tasks re strategy call and attend strategy call re same	1.30	942.50
01/10/2023	JRL	Telephone correspondence with client re update from call with monitor	0.30	295.50
01/10/2023	JRL	Email correspondence with monitor re appointment availability	0.10	98.50
01/10/2023	JRL	Strategize with J. Kearney re monitor and follow up with client	0.40	394.00
01/11/2023	ALF	Review applicable federal and state health privacy laws in connection with providing access to DHCS to medical records.	1.20	1,086.00
01/11/2023	ALF	Summarize considerations under applicable federal and state health privacy laws in connection with providing access to DHCS to medical records.	0.90	814.50
01/13/2023	JCK	Review DHCS request for records and develop strategy for response	0.40	378.00
01/13/2023	ALF	Confer with J. Kearney re disclosure of patient records to DHCS.	0.40	362.00
01/16/2023	JRL	Telephone correspondence with F. Stevens (monitor) re status update	0.80	788.00
01/16/2023	JRL	Telephone conference with I. Lee re monitor feedback and IOIs	0.30	295.50



Invoice Date: February 27, 2023

Invoice Number: 304284

JRL

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906Borrego Health
DOJ Investigation

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/16/2023	JRL	Telephone correspondence with D. Baldwin re data requests from DHCS	0.30	295.50
01/17/2023	JRL	Telephone conference with management team re updates from monitor	0.50	492.50
01/17/2023	JRL	Review correspondence from D. Baldwin re data requests from DHCS	0.20	197.00
01/17/2023	ALF	Confer with J. Kearney re disclosure of patient records to DHCS.	0.50	452.50
01/17/2023	TAR	Prepare agenda for strategy call re outstanding tasks	0.10	72.50
01/18/2023	JCK	Analysis of DHCS request for documents, develop strategy, and coordinate with client re the same	3.00	2,835.00
01/18/2023	JRL	Strategize with J. Kearney, D. Senelick and T. Reid re potential application to federal court for release of funds	0.20	197.00
01/18/2023	ALF	Confer with J. Kearney re disclosure of patient records to DHCS.	0.40	362.00
01/19/2023	JCK	Collecting client files and preparing for production	1.00	945.00
01/19/2023	P D	Review and compare information provided in Borrego files set spreadsheet and Borrego Tracer spreadsheet against patient files produced by client; identify missing files and incorrect entries; email to J. Kearney regarding same	1.10	500.50
01/20/2023	JCK	Prepare DHCS document production	0.50	472.50
01/20/2023	HP	Prepare electronically-stored information for production	0.10	36.00
01/23/2023	JRL	Review materials provided by Dr. Tuso in response to her attorney's request	0.50	492.50
01/23/2023	JRL	Email correspondence with G. Gedulin re document request for Dr. Tuso	0.20	197.00
01/23/2023	JRL	Meeting with monitor re status update	0.30	295.50
01/23/2023	ALF	Confer with D. Habig re BCHF non-profit registry status in California.	0.40	362.00
01/23/2023	TAR	Strategize re impact of BK on investigation and RICO litigation	0.50	362.50
01/24/2023	JRL	Email correspondence re email collection	0.10	98.50
01/24/2023	JRL	Review ruling on motion to dismiss in traveler's litigation	0.50	492.50
01/24/2023	JRL	Email correspondence with J. Sokol and S. Maizel re same	0.10	98.50



Invoice Date: February 27, 2023

Invoice Number: 304284

JRL

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10335
906Borrego Health
DOJ Investigation

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/25/2023	JRL	Telephone correspondence with client re monitor update and request	0.20	197.00
01/25/2023	ALF	Strategize staff members whose email should be pulled prior to auction.	0.40	362.00
01/25/2023	ALF	Confer with J. Kearney re filing RRF-1 to update registration status.	0.30	271.50
01/30/2023	JRL	Preparation for and telephone conference with monitor re status update	0.50	492.50
01/30/2023	JRL	Summarize meeting with monitor	0.10	98.50
01/31/2023	JRL	Email and telephone correspondence with client re monitor update	0.20	197.00
01/31/2023	ALF	Confer with CJ Pease re preparing RRF-1 filing to update registration status.	0.20	181.00
01/31/2023	ALF	Confer with J. Kearney re filing RRF-1 to update registration status.	0.10	90.50
01/31/2023	ALF	Review RRF-1 filing form requirements to update charitable registration status with state.	0.20	181.00
TOTAL HOURS AND FEES			21.50	\$ 19,386.00
LESS 20% DISCOUNT				(3,877.20)
NET TOTAL DUE				\$ 15,508.80



Invoice Date: February 27, 2023

Invoice Number: 304284

JRL

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10335
906Borrego Health
DOJ Investigation**TIMEKEEPER SUMMARY:**

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>BILLED HOURS</u>	<u>BILLED RATE</u>	<u>BILLED AMOUNT</u>
Joseph LaMagna	Partner	7.50	788.00	5,910.00
Jordan Kearney	Partner	5.50	756.00	4,158.00
Andrea Frey	Senior Counsel	5.40	724.00	3,909.60
Taryn Reid	Associate	1.90	580.00	1,102.00
Patrick Davoodi	Paralegal	1.10	364.00	400.40
Herby Preval	Litigation Support	0.10	288.00	28.80
PRE-DISCOUNTED TOTAL		21.50		\$ 19,386.00
LESS 20% DISCOUNT				(3,877.20)
NET TOTAL DUE				\$ 15,508.80

DISBURSEMENTS:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
Costs Advanced		
01/01/2023	Vendor: CS Disco Inc.; Invoice#: 208933; Date: 1/1/2023 - January, 2023 document hosting	7,008.03
		7,008.03
TOTAL DISBURSEMENTS		\$ 7,008.03

TOTAL AMOUNT DUE FOR THIS INVOICE	\$ 22,516.83
--	---------------------



1875 Century Park East
Suite 1600
Los Angeles, CA 90067
T: 310.551.8111
Tax ID Number: 95-4109805

REMITTANCE AND PAYMENT INSTRUCTIONS

Borrego Health
Rose Macisaac, CFO
P.O. Box 2369
Borrego Springs, CA 92004

Invoice Date: February 27, 2023
Invoice Number: 304284
JRL

INVOICE TOTAL \$ 22,516.83

10335 Borrego Health
906 DOJ Investigation

TOTAL AMOUNT DUE FOR THIS INVOICE	\$ 22,516.83
PREVIOUS OUTSTANDING BALANCE FOR THIS MATTER	17,148.83
TOTAL AMOUNT DUE	\$ 39,665.66

*****PAYMENT DUE IN 10 DAYS*****

Please Use One of our Convenient Payment Options	
Payment via ACH:	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Reference: Please include invoice number
Payment via Wire: (bank wire fees may apply)	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Bank Address: 2029 Century Park East, Suite 800, Los Angeles, CA 90067 Reference: Please include invoice number
Payment via Check:	Hooper, Lundy & Bookman, PC 1875 Century Park East, Suite 1600 Los Angeles, CA 90067



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Suite 1600
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T: 310.551.8111
Tax ID Number: 95-4109805

Borrego Health
Rose Macisaac
P.O. Box 2369
Borrego Springs, CA 92004

Invoice Date: February 27, 2023
Invoice Number: 304283
JRL

INVOICE TOTAL \$ 10,392.00

10335 Borrego Health
913 Medi-Cal Audit Appeals

Professional Services Rendered Through January 31, 2023

TOTAL FEES THIS INVOICE	12,990.00
Less 20% Discount	(2,598.00)
NET TOTAL FEES THIS INVOICE	10,392.00
CURRENT INVOICE TOTAL	\$ 10,392.00
PREVIOUS OUTSTANDING BALANCE FOR THIS MATTER	52,617.20
TOTAL AMOUNT DUE	\$ 63,009.20

*****PAYMENT DUE IN 10 DAYS*****

Please Use One of our Convenient Payment Options

Payment via ACH:	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Reference: Please include invoice number
Payment via Wire: (bank wire fees may apply)	Bank Name: Comerica Bank ABA/Routing Number: 121137522 Account Number: 1895755088 Bank Address: 2029 Century Park East, Suite 800, Los Angeles, CA 90067 Reference: Please include invoice number
Payment via Check:	Hooper, Lundy & Bookman, PC 1875 Century Park East, Suite 1600 Los Angeles, CA 90067



Invoice Date: February 27, 2023

Invoice Number: 304283

JRL

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10335
913Borrego Health
Medi-Cal Audit Appeals**PROFESSIONAL SERVICES RENDERED:**

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/10/2023	SJS	Review and revise update to client acceptance of SODI	0.20	194.00
01/10/2023	JL	Draft strategy update email to client regarding SODI and request for informal appeal	0.40	290.00
01/17/2023	SJS	Review and analyze rejection letter from OAHA; correspond with HLB team re the same; facilitate calendaring of submission deadlines	0.50	485.00
01/18/2023	SJS	Draft and revise declaration in support of good cause submission; review and circulate correspondence and evidence of exit conference and exchange of data from CMS	1.50	1,455.00
01/18/2023	JL	Draft declaration of Rose MacIsaac ISO statement of good cause	0.70	507.50
01/18/2023	JL	Draft email analyzing strategy for statement of good cause	0.20	145.00
01/19/2023	SJS	Review and revise declaration in support of good cause submission; review prior emails and correspondence re timeline for good cause submission; conference with J. Lin re good cause submission	1.10	1,067.00
01/19/2023	JL	Strategize w. S. Stock on revising declaration of Rose MacIsaac in support of statement of good cause	0.90	652.50
01/20/2023	SJS	Review correspondence from DHCS re good cause briefing	0.20	194.00
01/21/2023	JL	Review and revise declaration of Rose MacIsaac ISO statement of good cause	1.10	797.50
01/23/2023	JL	Review and revise declaration of Rose MacIsaac ISO statement of good cause	0.40	290.00
01/24/2023	JCK	Call with Bankruptcy counsel to coordinate re outstanding issues relating to audit appeals	1.10	1,039.50
01/24/2023	SJS	Conference with BK counsel re Medi-Cal audit appeal strategy	1.00	970.00
01/26/2023	SJS	Review and revise declaration in support of good cause arguments	1.10	1,067.00
01/26/2023	JL	Review and revise declaration of Rose MacIsaac ISO statement of good cause	0.20	145.00
01/27/2023	JCK	Call with R. MacIsaac re response to 15 day letters	0.20	189.00



Invoice Date: February 27, 2023

Invoice Number: 304283

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10335 Borrego Health
913 Medi-Cal Audit Appeals

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>NARRATIVE</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/27/2023	JL	Draft statement of good cause for late submission of SODI	1.30	942.50
01/28/2023	JL	Draft statement of good cause	0.30	217.50
01/30/2023	JL	Draft statement of good cause to submit SODI	1.70	1,232.50
01/31/2023	JCK	Communicate with R. MacIsaac re declaration in support of good cause motion	0.10	94.50
01/31/2023	JL	Review and revise statement of good cause for submitting SODI	0.80	580.00
01/31/2023	JL	Review and revise declaration of Rose MacIsaac ISO statement of good cause	0.60	435.00
TOTAL HOURS AND FEES			15.60	\$ 12,990.00
LESS 20% DISCOUNT				(2,598.00)
NET TOTAL DUE				\$ 10,392.00

TIMEKEEPER SUMMARY:

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>BILLED HOURS</u>	<u>BILLED RATE</u>	<u>BILLED AMOUNT</u>
Stanton Stock	Partner	5.60	776.00	4,345.60
Jordan Kearney	Partner	1.40	756.00	1,058.40
Jeffrey Lin	Associate	8.60	580.00	4,988.00
PRE-DISCOUNTED TOTAL		15.60		\$ 12,990.00
LESS 20% DISCOUNT				(2,598.00)
NET TOTAL DUE				\$ 10,392.00

TOTAL AMOUNT DUE FOR THIS INVOICE**\$ 10,392.00**



1875 Century Park East
Suite 1600
Los Angeles, CA 90067
T: 310.551.8111
Tax ID Number: 95-4109805

REMITTANCE AND PAYMENT INSTRUCTIONS

Borrego Health
Rose Macisaac, CFO
P.O. Box 2369
Borrego Springs, CA 92004

Invoice Date: February 27, 2023
Invoice Number: 304283
JRL

INVOICE TOTAL \$ 10,392.00

10335 **Borrego Health**
913 **Medi-Cal Audit Appeals**

TOTAL AMOUNT DUE FOR THIS INVOICE	\$ 10,392.00
PREVIOUS OUTSTANDING BALANCE FOR THIS MATTER	52,617.20
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