

Matthew A. Clemente (admitted *pro hac vice*)
Dennis M. Twomey (admitted *pro hac vice*)
Alyssa Russell (admitted *pro hac vice*)
Sidley Austin LLP
One South Dearborn Street
Chicago, Illinois 60603
Telephone: (312) 853-7000
Facsimile: (312) 853-7036

Penny P. Reid
Paige Holden Montgomery
Juliana L. Hoffman
Sidley Austin LLP
2021 McKinney Avenue
Suite 2000
Dallas, Texas 74201
Telephone: (214) 981-3300
Facsimile: (214) 981-3400

**IN THE UNITED STATES BANKRUPTCY COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Debtor.

Chapter 11

Case No. 19-34054-sgj11

Objection deadline: August 9, 2021 @ 5:00 p.m. (CT)
Hearing Date: TBD

**SUMMARY COVER SHEET FOR THE SIXTH INTERIM FEE APPLICATION
OF SIDLEY AUSTIN LLP, ATTORNEYS FOR THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS, FOR COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD FROM MARCH 1, 2021
THROUGH AND INCLUDING MAY 31, 2021**

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.



1934054210719000000000006

Name of Applicant:	Sidley Austin LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors of Highland Capital Management, LP
Date of Retention:	October 29, 2019 by Order entered January 9, 2019
Time period covered by this Application:	March 1, 2020 – May 31, 2021
Total amounts awarded in prior Applications:	NA
Total amount of fees requested in this Application:	\$1,527,522.75
Total amount of reimbursable expenses sought in this Application:	\$32,957.78

This is a: ☐ monthly ☒ interim ☐ final application.

This is Sidley's sixth interim fee application.

PRIOR MONTHLY APPLICATIONS FILED

		Requested		Approved		Outstanding	
Date Filed; Docket No.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses
1/10/20; #343	10/29/19-11/30/19	\$993,818.70	\$10,247.88	\$993,818.70	\$10,247.88	\$0.00	\$0.00
1/31/20; #420	12/1/19-12/31/19	\$878,331.60	\$30,406.08	\$878,331.60	\$30,406.08	\$0.00	\$0.00
3/4/20; #501	1/1/20-1/31/20	\$711,364.50	\$12,673.30	\$711,364.50	\$12,673.30	\$0.00	\$0.00
3/20/20; #542	2/1/20-2/29/20	\$571,444.65	\$2,927.21	\$571,444.65	\$2,927.21	\$0.00	\$0.00
4/20/20; #594	3/1/20-3/31/20	\$596,045.25	\$14,406.39	\$596,045.25	\$14,406.39	\$0.00	\$0.00
5/20/20; #639	4/1/20-4/30/20	\$548,274.15	\$5,765.07	\$548,274.15	\$5,765.07	\$0.00	\$0.00
6/22/20; #767	5/1/20-5/31/20	\$429,530.85	\$2,758.75	\$429,530.85	\$2,758.75	\$0.00	\$0.00

7/20/20; #877	6/1/20- 6/30/20	\$617,236.20	\$5,759.29	\$617,236.20	\$5,759.29	\$0.00	\$0.00
8/19/20; #969	7/1/20- 7/31/20	\$663,867.90	\$10,470.96	\$663,867.90	\$10,470.96	\$0.00	\$0.00
9/19/20; #1074	8/1/20- 8/31/20	\$584,416.35	\$2,448.22	\$584,416.35	\$2,448.22	\$0.00	\$0.00
10/23/20; #1283	9/1/20- 9/30/20	\$446,112.45	\$2,204.73	\$446,112.45	\$2,204.73	\$0.00	\$0.00
11/30/20; #1490	10/1/20- 10/31/20	\$672,302.25	\$3,125.47	\$672,302.25	\$3,125.47	\$0.00	\$0.00
12/24/20; #1632	11/1/20- 11/30/20	\$502,074.90	\$3,643.80	\$502,074.90	\$3,643.80	\$0.00	\$0.00
1/26/21; #1842	12/1/20- 12/31/20	\$520,448.85	\$5,403.36	\$520,448.85	\$5,403.36	\$0.00	\$0.00
3/2/21; #1963	1/1/21- 1/31/21	\$819,656.10	\$6,612.00	\$819,656.10	\$6,612.00	\$0.00	\$0.00
4/5/21; #2160	2/1/21- 2/28/21	\$616,905.00	\$11,141.12	\$616,905.00	\$11,141.12	\$0.00	\$0.00
5/18/21; #2328	3/1/21- 3/31/21	\$464,802.75	\$6,279.02	\$371,842.20	\$6,279.02	\$92,960.55	\$0.00
6/1/21; #2396	4/1/21- 4/30/21	\$521,784.00	\$21,694.88	\$417,427.20	\$21,694.88	\$104,356.80	\$0.00
7/14/21; #2570	5/1/21- 5/31/21	\$540,936.00	\$4,983.88	<i>Pending</i>	<i>Pending</i>	\$540,936.00	\$4,983.88

**SUMMARY OF TOTAL FEES AND HOURS
BY ATTORNEYS AND PARAPROFESSIONALS**

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate	Total Hours Billed²	Total Compensation
Suresh T. Advani	Partner Restructuring	1992	\$1,625	1.10	\$1,787.50
David R. Carpenter	Partner Litigation	2004	\$1,175	1.60	\$1,880.00
Matthew A. Clemente	Partner Restructuring	1998	\$1,350	351.00	\$473,850.00

² Sidley charged for only 50% of non-working travel time. Such reductions are reflected in the figures in this column.

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate	Total Hours Billed ²	Total Compensation
Thomas D. Cunningham	Partner Litigation	1995	\$1,200	5.00	\$6,000.00
Michael P. Goldman	Partner Insurance	1985	\$1,600	20.50	\$32,800.00
Paige H. Montgomery	Partner Litigation	2002	\$1,125	151.00	\$169,875.00
Penny R. Reid	Partner Litigation	1989	\$1,400	53.90	\$75,460.00
Dennis M. Twomey	Partner Restructuring	2000	\$1,350	18.90	\$25,515.00
Mustafa Abdul-Jabbar	Associate Litigation	2016	\$930	103.80	\$96,534.00
Elliot A. Bromagen	Associate Restructuring	2017	\$885	143.10	\$126,643.50
Ryan Fink	Associate Restructuring	2021	\$590	65.10	\$39,711.00
Patrick G. Foley	Associate Litigation	2013	\$1,025	12.00	\$12,300.00
Sophie V. Franks	Associate Litigation	2020	\$610	.50	\$305.00
Nidhi George	Associate Litigation	2020	\$610	5.00	\$3,050.00
Juliana Hoffman	Associate Restructuring	2017	\$815	164.40	\$133,986.00
Seulbee Lee	Associate Insurance	2015	\$970	18.60	\$18,042.00
Taylor Nifong	Associate Restructuring	2020	\$610	195.20	\$119,072.00
Chandler M. Rognes	Associate Litigation	2019	\$715	238.20	\$170,313.00
Alyssa Russell	Associate Restructuring	2015	\$970	105.70	\$102,529.00
Nancy P. Cade	Paralegal Litigation	30 years	\$450	18.70	\$8,415.00
Crystal Clark	Paralegal Litigation	10 years	\$415	7.50	\$3,112.50
David J. Lutes	Paralegal Restructuring	34 years	\$490	154.70	\$75,803.00
Danielle Griffith	Research Analyst Library	3 years	\$240	.50	\$120.00
Judy Yu	Research Analyst Library	11 years	\$240	.60	\$144.00
Total				1,836.60	\$1,697,247.50
10% Discount					\$169,724.75
Grand Total					\$1,527,522.75
Blended Rate					\$831.71

STATEMENT OF FEES AND EXPENSES BY PROJECT CATEGORY

Task Description	Total Hours	Total Fees
001 – Asset Analysis and Recovery	.50	\$407.50
002 – Asset Disposition	.90	\$873.00
005 – Committee Meetings	49.20	\$45,390.50
006 – Business Operations	5.40	\$6,841.00
007 – Case Administration	130.70	\$133,759.50
008 – Claims Administration and Objections	13.70	\$14,552.50
009 – Corporate Governance	32.60	\$33,698.00
011 – Retention	62.20	\$46,006.00
012 – Fee Applications	134.00	\$75,241.00
013 – Financing and Cash Collateral	6.80	\$8,218.00
014 – Litigation	1,155.40	\$1,051,356.00
015 – Plan and Disclosure Statement	224.40	\$253,130.50
016 – Non-Working Travel ³	0.00	\$0.00
021 – Tax	1.50	\$2,167.00
024 – Creditor Communications	19.30	\$25,607.00
TOTAL	1,836.60	\$1,697,247.50
TOTAL WITH 10% DISCOUNT		\$1,527,522.75

EXPENSE SUMMARY

Category	Amount
Copying	\$343.99
Court Costs	\$2,410.63
Delivery Services/Messenger	\$494.20
Litigation Support Vendors	\$7,939.76
On-line Research Services (Westlaw, Lexis, Pacer and related services)	\$7,732.02
Outside Printing	\$1,730.25
Postage	\$113.85
Telephone (includes non-local calls)	\$16.63
Transcripts (includes trial and deposition transcripts)	\$12,176.45
TOTAL:	\$32,957.78

³ As noted above, Sidley charged the Debtor for only 50% of non-working travel time.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Debtor.

Chapter 11

Case No. 19-34054-sgj11

**Objection deadline: August 9, 2021 @ 5:00 p.m. (CT)
Hearing: TBD**

**SIXTH INTERIM FEE APPLICATION OF SIDLEY AUSTIN LLP, ATTORNEYS FOR
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM MARCH 1, 2021 THROUGH AND INCLUDING MAY 31, 2021**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), and the Delaware Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, entered on November 14, 2019 [Docket No. 136] (the “Interim Compensation Procedures Order”), Sidley Austin LLP (“Sidley”), attorneys for the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned chapter 11 case (the “Chapter 11 Case”), hereby files this sixth interim fee application (this “Application”) for entry of an order (the “Order”), substantially in the form attached to this Application as **Exhibit A** granting interim allowance of (a) compensation for professional services to the Committee during the period from March 1, 2021 to and including May 31, 2021 (the “Interim Fee Period”) in the amount of \$1,527,522.75, and (b) reimbursement

¹ The Debtor’s last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

of the actual and necessary expenses incurred by Sidley during the Interim Fee Period, in the amount of \$32,957.78. In support of this Application, Sidley submits the declaration of Matthew

A. Clemente, a partner of Sidley (the “Clemente Declaration”), which is attached hereto as **Exhibit**

B. In further support of the Application, Sidley respectfully represents as follows:

STATUS OF CASE AND JURISDICTION

1. On October 16, 2019 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Delaware Court”). The Debtor has continued in possession of its properties and has continued to operate and manage its business as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On October 29, 2019, the United States Trustee for the District of Delaware (the “U.S. Trustee”) filed its Notice of Appointment of Committee of Unsecured Creditors [Docket No. 65].

3. On November 14, 2019, the Delaware Court signed the Interim Compensation Procedures Order, authorizing certain professionals and members of any official committee (“Professionals”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to procedures specified therein. The Interim Compensation Procedures Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within twenty-one (21) days after service of the monthly fee application the Debtor is authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. Beginning with the period ending December 31, 2019 and at three-month intervals or such other intervals convenient to the Court, each Professional shall file and serve an interim application

for allowance of the amounts sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

4. On December 4, 2019, the Delaware Court entered an order transferring venue of this case from the District of Delaware to the Northern District of Texas [Docket No. 1084].

5. The United States Bankruptcy Court for the Northern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

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

7. The statutory and other bases for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, Local Rule 2016-1, and the Interim Compensation Order. This Application also substantially complies with the requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. §330 by Attorneys in Larger Chapter 11 Cases, Effective as of November 1, 2013* (the “U.S. Trustee Guidelines”), and the *General Order 2006-02 Regarding Procedures For Complex Chapter 11 Cases* from the United States Bankruptcy Court Northern District of Texas.

8. The Committee retained Sidley as its bankruptcy counsel, *nunc pro tunc*, to October 29, 2019, pursuant to the *Order Authorizing the Retention and Employment of Sidley Austin LLP as Counsel to the Official Committee of Unsecured Creditors, Nunc Pro Tunc to October 29, 2019* [Docket No. 334] (the “Retention Order”). The Retention Order authorizes the Committee to compensate and reimburse Sidley in accordance with the terms and conditions

set forth in the Committee's application to retain Sidley, subject to Sidley's application to the Court.

SIDLEY'S PRIOR FEE APPLICATIONS

9. The Interim Compensation Order provides that, during pendency of this Chapter 11 Case, all retained professionals shall file with the Court monthly applications for interim allowance of compensation of services rendered and reimbursement of expenses incurred in connection with such services, together with copies of the applicable time records and itemized expenses (each a "Monthly Fee Application"). Pursuant to the procedures set forth in the Interim Compensation Order, Sidley has filed with the Court and served upon the appropriate notice parties a Monthly Fee Application for each month from March 1, 2021 through May 31, 2021. Each of Sidley's Monthly Fee Applications is incorporated herein by reference.² The computerized records of time expended providing professional services to the Committee are attached hereto as **Exhibit C**.³ A detailed statement of Sidley's out-of-pocket expenses incurred during the Interim Fee Period is attached hereto as **Exhibit D**.⁴

10. In addition to establishing procedures for the submission of Monthly Fee Applications, the Interim Compensation Order provides that, beginning with the period from the Petition Date to and including February 29, 2020, and continuing at regular intervals thereafter during the pendency of this Chapter 11 Case, each professional may file with the Court an application for interim approval and allowance of any outstanding compensation for

² The docket numbers of Sidley's Monthly Fee Applications are 2328, 2396 and 2570. The docket numbers of the corresponding certificates of no objection for Sidley's three Monthly Fee Applications are 2512, 2498 and TBD.

³ Detailed time records which relate to the periods covered by each Monthly Fee Application were also attached to the Monthly Fee Applications as Exhibit A thereto.

⁴ Detailed expense records which relate to the periods covered by each Monthly Fee Application were also attached to each Monthly Fee Application as Exhibit B thereto.

services rendered and reimbursement of expenses sought in the Monthly Fee Applications filed during such period.

11. A summary of the Monthly and Interim Fee Applications previously filed in this Chapter 11 Case is set forth in the chart below:

		Requested		Approved		Outstanding	
Date Filed; Docket Nos.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses
1st Interim ⁵ ; 4/7/20; [ECF No. 569]	10/29/19 – 2/29/20	\$3,154,959.45	\$56,254.47	\$3,154,959.45	\$56,254.47	\$0.00	\$0.00
2nd Interim 7/14/20; [ECF No. 831]	3/1/20 – 5/31/20	\$1,573,850.25	\$22,930.21	\$1,573,850.25	\$22,930.21	\$0.00	\$0.00
3rd Interim; 10/27/20; [ECF No. 1296]	6/1/20 – 8/31/20	\$1,865,520.45	\$18,678.47	\$1,865,520.45	\$18,678.47	\$0.00	\$0.00
4th Interim; 1/27/21; [ECF No. 1853]	9/1/20 – 11/30/20	\$1,620,489.60	\$8,974.00	\$1,620,489.60	8,974.00	\$0.00	\$0.00
5th Interim; 4/21/21; [ECF No. 2233]	12/1/20 – 2/28/21	\$1,957,009.95	\$23,156.48	\$1,957,009.95	\$23,156.48	\$0.00	\$0.00
17th Monthly; 5/18/21; [ECF No. 2328]	3/1/21 – 3/31/21	\$464,802.75	\$6,279.02	\$371,842.20	\$6,279.02	\$92,960.55	\$0.00
18th Monthly; 6/1/21; [ECF No. 2396]	4/1/21 – 4/30/21	\$521,784.00	\$21,694.88	\$417,427.20	\$21,694.88	\$104,356.80	\$0.00
19th Monthly; 7/14/21; [ECF No. 2570]	5/1/21 – 5/31/21	\$540,936.00	\$4,983.88	<i>Pending</i>	<i>Pending</i>	\$540,936.00	\$4,983.88
Total		\$11,699,352.45	\$162,951.41	\$10,961,099.10	\$157,967.53	\$738,253.35	\$4,983.88

RELIEF REQUESTED

12. By this Application, Sidley respectfully requests entry of an order (a) granting allowance and approval of compensation for Sidley's services to the Committee for the Interim Fee Period in the amount of \$1,527,522.75, (b) reimbursement of expenses that

⁵ Sidley's First Interim Fee Application incorporated Sidley's first, second, third and fourth Monthly Fee Statements.

Sidley incurred during the Interim Fee Period in the amount of \$32,957.78, and (c) authorizing and directing payment of such sums to Sidley pursuant to the Interim Compensation Order.

FEES EARNED DURING THE INTERIM FEE PERIOD

I. Customary Billing Disclosures

13. Sidley's hourly rates are set at a level designed to compensate Sidley fairly for the work of its attorneys and paraprofessionals and to cover fixed and routine expenses. The hourly rates charged by Sidley in this Chapter 11 Case were billed in accordance with Sidley's rates and procedures in effect during the Interim Fee Period and in accordance with the Retention Order. As described in the Retention Application, the rates Sidley charges for the services of its attorneys and paraprofessionals in this Chapter 11 Case are consistent with the rates Sidley charges other comparable chapter 11 clients, regardless of the location of the case. Moreover, Sidley's rate structure is appropriate and not significantly different from the rates that Sidley charges for non-bankruptcy representations or the rates that other comparable counsel would charge to perform substantially similar services.

14. Sidley has received no payment or promises of payment from any source other than the Committee for services rendered in this Chapter 11 Case. There is no agreement or understanding between Sidley and any other entity or person, other than members of the Firm, for the sharing of compensation to be received for services rendered in or in connection with this Chapter 11 Case. All professional and paraprofessional services for which Sidley is requesting compensation were rendered solely on behalf of the Committee.

II. Supporting Documentation

15. For the convenience of the Court and parties in interest and in accordance with paragraph C of the U.S. Trustee Guidelines, the following information is prefixed to this Application:

- (a) a cover sheet summarizing the contents of this Application;
- (b) schedules identifying all Sidley attorneys and paraprofessionals who provided services to the Committee during the Interim Fee Period, including, with respect to each attorney and paraprofessional, as applicable, his or her position and area of expertise, date of admission or years of experience, hourly rate, hours billed and total fees charged;
- (c) a summary of Sidley's compensation by project matter category for services provided to the Committee during the Interim Fee Period; and
- (d) a summary of the actual and necessary expenses that Sidley incurred during the Interim Fee Period in connection with its professional services to the Committee.

16. In addition: (a) the Clemente Declaration, which includes, among other things, a statement under paragraph C.5 of the U.S. Trustee Guidelines, is attached hereto as **Exhibit B**; (b) the budget and staffing plan of Sidley for the Interim Fee Period is attached hereto as **Exhibit E**; and (c) Sidley's disclosures of customary and comparable compensation, including blended hourly rates, for the Interim Fee Period is attached hereto as **Exhibit F**.

SUMMARY OF SERVICES

17. During the Interim Fee Period, Sidley vigorously represented the Committee and enhanced its understanding of many issues critical in this Chapter 11 Case, thereby providing their constituency with the opportunity to obtain a meaningful recovery. During the Interim Fee Period, the Committee: (a) prosecuted key discovery issues, including procuring an order requiring preservation of documents, (b) negotiated various stipulations, settlement agreements, and consensual resolutions to outstanding motions, (c) commenced and pursued critical investigations, both independently and alongside the Litigation Trustee, and (d) monitored and participated in various litigation proceedings, including depositions, adversary proceedings and Fifth Circuit and district court appeals. The advice and assistance of Sidley in

connection with these and all other facets of the Committee's oversight of the Debtor's reorganization serves as the basis for the compensation requested in this Application.

18. The services rendered by Sidley during the Interim Fee Period can be grouped into the categories set forth below. Sidley attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category. Categories with less than one hour of services are not listed below.

(a) Asset Disposition – Category No. 02

Interim Fee Period: .90 hours; \$873.00

19. This matter category includes time spent by Sidley attorneys reviewing and analyzing asset purchase proposals from various third parties, including the Debtor's former principal.

(b) Committee Meetings – Category No. 5

Interim Fee Period: 49.20 hours; \$45,390.50

20. This matter category includes time spent by Sidley attorneys and paraprofessionals in connection with regular and special meetings held telephonically with the Committee, the Committee's other professional advisors, and the Committee members' advisors.

(c) Business Operations – Category No. 6

Interim Fee Period: 5.40 hours; \$6,841.00

21. This matter category includes time spent by Sidley attorneys analyzing and performing diligence on various asset sales, distributions, and other transactions proposed by third parties in furtherance of the Committee's oversight role under the agreed protocols. This

matter category also includes strategic discussions with the Committee's financial professionals, the Debtor's professionals, and the Debtor's independent directors.

(d) Case Administration – Category No. 7

Interim Fee Period: 130.70 hours; \$133,759.50

22. This matter category includes time spent on various tasks that were necessary to ensure the efficient administration of legal services related to this Chapter 11 Case. Specifically, Sidley attorneys and paraprofessionals spent time (i) coordinating, managing and administering this Chapter 11 Case, including reviewing filings on the case docket, monitoring critical dates, and maintaining a case calendar, work plan and status reports; (ii) communicating with the Committee, its members, their advisors and the Debtor's counsel to manage various work streams throughout the Chapter 11 Case; (iii) reviewing procedures for case administration and docket monitoring; (iv) organizing and maintaining document files for the case; (v) ensuring compliance with service and notice requirements of the Bankruptcy Code, the Bankruptcy Rules, Local Rules, including coordinating service of pleadings and related notices with the Debtor's claims and noticing agent; (vi) ensuring compliance with all other applicable requirements of the Bankruptcy Code, Bankruptcy Rules, Local Rules and orders and procedures issued by the Court; (vii) reviewing monthly operating reports of the Debtor; and (viii) communicating with the Court regarding hearings and various procedural matters. This matter category also includes work and meetings related to multiple matters such that the time cannot be easily allocated to one of the other matter categories.

(e) Claims Administration and Objections – Category No. 8

Interim Fee Period: 13.70 hours; \$14,552.50

23. This matter category includes time spent by Sidley attorneys reviewing and analyzing various proofs of claim filed against the Debtor, as well as the terms of proposed

settlement agreements and 9019 motions in connection with claims against the estate. Additionally, Sidley reviewed, assessed and advised the Committee on implications of claim transfers as well as certain tax distribution claims. This matter category also includes strategic discussions and review of the Debtor's claims analysis and proposal for reducing the Debtor's claim pool, as well as the Committee's own analysis of implications for disputing or settling Debtor claims.

(f) Corporate Governance and Board Matters – Category No. 9

Interim Fee Period: 32.60 hours; \$33,698.00

24. This matter category includes time spent by Sidley attorneys in connection with the Debtor's governance structure, including participating and advising the Committee on communications and conferences with the Debtor's independent board of directors. This matter category also includes time spent analyzing and strategizing with other professionals regarding the Debtor's post-effective date governance structure, as well as critical matters pertaining to the D&O policies.

(g) Retention – Category No. 11

Interim Fee Period: 62.20 hours; \$46,006.00

25. This matter category includes time spent by Sidley attorneys and paraprofessionals providing services related to the negotiation of the terms of the Litigation Trustee's engagement, as well as the execution and filing of its engagement letter and retention application. This matter category also includes time spent by Sidley attorneys conducting, reviewing and filing the customary supplemental conflicts check.

(h) Fee Applications – Category No. 12

Interim Fee Period: 134.00 hours; \$75,241.00

26. This matter category includes time spent by Sidley attorneys and paraprofessionals: (i) preparing monthly and interim fee application materials and exhibits; (ii) ensuring that the time entries and expense entries for which Sidley is requesting compensation and reimbursement pursuant to this Application comply with the applicable provisions of the Bankruptcy Rules, Local Rules and the U.S. Trustee Guidelines; (iii) reviewing the U.S. Trustee Guidelines; (iv) advising the Committee's other professionals on matters related to fee applications and compliance with U.S. Trustee Guidelines and Local Rules; and (v) engaging in correspondence with the Committee and its other professionals regarding the same.

(i) Financing and Cash Collateral – Category No. 13

Interim Fee Period: 6.80 hours; \$8,218.00

27. This matter category includes time spent by Sidley attorneys providing services in connection with the Debtor's exit financing. Specifically, Sidley reviewed, analyzed and advised the Committee on the terms of the proposed exit financing and engaged in strategic discussions with the Debtor's Board and team of professionals to assess the impact the financing would have on the Plan's effectiveness.

(j) Litigation – Category No. 14

Interim Fee Period: 1,155.40 hours; \$1,051,356.00

28. This matter category includes time spent by Sidley attorneys and paraprofessionals providing services related to matters in an adversarial posture, as well as investigating potential claims and causes of action held by the Debtor's estate. Specifically, Sidley attorneys spent time: (i) assessing potential causes of action to leverage estate value and developing strategy for such potential litigation; (ii) researching, prosecuting and analyzing

various discovery-related issues and pleadings, including the Committee's Preservation Motion, privilege logs and document review; (iii) analyzing and advising the Committee on various pleadings and adversary proceedings, including the Debtor's Contempt Motion and the implications of the TRO violation; (iv) preparing for and participating in depositions and Court hearings, and (v) monitoring, assessing and participating in various adversary and appeals proceedings on behalf of the creditors and creditor-constituents.

(k) Plan and Disclosure Statement – Category No. 15

Interim Fee Period: 224.40 hours; \$253,130.50

29. This matter category includes time spent by Sidley attorneys related to the review, analysis and negotiation surrounding the terms of the Debtor's Plan and effective date conditions, litigation trust agreement and related issues, as well as overall investigation into and strategy regarding the Debtor's emergence. This matter category also includes time spent reviewing and analyzing pleadings relating to the appeal of the confirmation order, as well as time spent researching and drafting responses in furtherance of same. Sidley attorneys utilized this matter category for time spent assessing liquidity needs for the Plan's effectiveness, D&O policy issues, and proposals to purchase the Debtor's assets. Further, Sidley attorneys assessed, advised the Committee on, and responded to various motions and issues relating to the various requests for a stay pending appeal of the confirmation order.

(l) Tax – Category No. 21

Interim Fee Period: 1.50 hours; \$2,167.00

30. This matter category includes Sidley attorneys' review and analysis of the tax implications of certain transactions, as well as time spent conferring with the Committee's financial advisors to assess certain audits and tax claims.

(m) Creditor Communications – Category No. 24

Interim Fee Period: 19.30 hours; \$25,607.00

31. This matter category includes time spent by Sidley attorneys communicating with individual unsecured creditors and their respective counsel (both members of the Committee and non-members) regarding the status of specific motions, discovery and Plan-related issues, as well as the status of the case generally.

ACTUAL AND NECESSARY EXPENSES

32. Attached hereto as **Exhibit D** is a detailed statement of Sidley’s out-of-pocket expenses incurred during the Interim Fee Period, totaling \$32,957.78. These expenses include, but are not limited to, reprographics services, court fees, out-of-town travel expenses, and litigation support vendors.

**SIDLEY’S REQUESTED COMPENSATION AND
EXPENSE REIMBURSEMENT SHOULD BE ALLOWED**

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

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

- (a) the time spent on such services;
- (b) the rates charged for such services;
- (c) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered towards the completion of, a case under this title;

- (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and expertise in the bankruptcy field; and
- (f) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

34. Sidley respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, necessary for and beneficial to the Committee and were rendered to assist the Committee in discharging its statutory duties during the pendency of this Chapter 11 Case. Sidley further believes that its services to the Committee during the Interim Fee Period were performed efficiently and in an expert manner and ultimately benefitted the Committee and the Debtor's unsecured creditors, the Debtor, and its estate. Sidley submits that the compensation requested herein is reasonable in light of the nature, extent, and value of Sidley's services to the Committee. Accordingly, the Application should be approved.

RESERVATION OF RIGHTS

35. Sidley reserves the right to modify, amend, or supplement this Application at any time before the hearing on this Application.

NOTICE

36. Pursuant to the Interim Compensation Order, the Interim Fee Application is being served upon the Notice Parties and all parties that have requested notice in this Chapter 11 case pursuant to Bankruptcy Rule 2002. Sidley submits that, in light of the nature of the relief requested, no other or further notice need be given.

[Remainder of page intentionally left blank]

WHEREFORE, Sidley respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, (a) approving the Interim Fee Application; (b) awarding Sidley compensation for professional services to the Committee during the Interim Fee Period in the amount of \$1,527,522.75; (c) awarding Sidley reimbursement of expenses during the Interim Fee Period in the amount of \$32,957.78; (d) authorizing payment of such sums to Sidley pursuant to the Interim Compensation Order; and (e) granting such other and further relief as the Court may deem just and proper.

Dated: July 19, 2021

Respectfully submitted,

SIDLEY AUSTIN LLP

/s/ Juliana L. Hoffman

Matthew A. Clemente (admitted *pro hac vice*)

Dennis M. Twomey (admitted *pro hac vice*)

One South Dearborn Street

Chicago, Illinois 60603

Telephone: (312) 853-7000

Facsimile: (312) 853-7036

-and-

Penny P. Reid

Paige Holden Montgomery

Juliana L. Hoffman

2021 McKinney Avenue

Suite 2000

Dallas, Texas 74201

Telephone: (214) 981-3300

Facsimile: (214) 981-3400

*Counsel For the Official Committee of Unsecured
Creditors*

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Debtor.

Chapter 11

Case No. 19-34054-sgj11

**ORDER GRANTING SIXTH INTERIM FEE APPLICATION OF SIDLEY AUSTIN LLP,
ATTORNEYS FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM MARCH 1, 2021 THROUGH AND INCLUDING MAY 31, 2021**

Upon consideration of the application (“Application”)² of Sidley Austin LLP (“Sidley”) for allowance of compensation for professional services rendered in the above captioned Chapter 11 Case during the period from March 1, 2021 through and including May 31, 2021 (the “Fee Period”), it is HEREBY ORDERED THAT:

1. Sidley is granted interim allowance of compensation in the amount of \$1,527,522.75 for the Interim Fee Period.

2. Sidley is granted interim allowance of reimbursements for expenses incurred in the amount of \$32,957.78 for the Interim Fee Period.

¹ The Debtor’s last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

² Each capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Application.

3. The Debtor is authorized and directed to remit payment to Sidley of such allowed compensation and expense reimbursement amounts, less any and all amounts previously paid on account of such fees and expenses.

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

End of Order

Exhibit B

Clemente Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Debtor.

Chapter 11

Case No. 19-34054-sgj11

**Objection Deadline: August 9, 2021 at 5:00 p.m. (CT)
Hearing Date: TBD**

**DECLARATION OF MATTHEW A. CLEMENTE IN SUPPORT OF THE SIXTH
INTERIM FEE APPLICATION OF SIDLEY AUSTIN LLP, ATTORNEYS
FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM MARCH 1, 2021 THROUGH AND INCLUDING
MAY 31, 2021**

I, Matthew A. Clemente, being duly sworn, state the following under penalty of perjury:

1. I am a partner of the law firm Sidley Austin LLP (“Sidley” or the “Firm”) located at One South Dearborn Street, Chicago, Illinois 60603.

2. I have reviewed the foregoing sixth interim fee application of Sidley for compensation as attorneys for the Official Committee of Unsecured Creditors (the “Application”).² To the best of my knowledge, information and belief, the statements contained in the Application are true and correct.

3. The following statement is provided in response to the questions set forth in paragraph C.5 of the U.S. Trustee Guidelines:

¹ The Debtor’s last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

- a. As previously disclosed, Sidley and the Committee agreed to ten percent (10%) reduction of Sidley's standard hourly billing rates for this engagement.
- b. The fees requested in the Application were not higher by 10% or more than the fees budgeted for the Interim Fee Period.
- c. None of the professionals included in the Application varied their hourly rate based on the geographic location of the Debtor's Chapter 11 Case.
- d. Sidley is not requesting compensation for the review or revision of time records or the preparation, review and revision of invoices that is not related to the preparation of applications for compensation.
- e. The time period covered by the Application for the Interim Fee Period includes approximately 7.40 hours with a value of \$6,889.50 spent to ensure the time entries subject for the Interim Fee Period do not disclose privileged or confidential information. This review and any revisions associated therewith are a necessary component of Sidley's preparation of each monthly application.
- f. The Application does include rate increases since the date of Sidley's retention in these chapter 11 cases as particularly noted in the *Application for Employment of Sidley Austin LLP as counsel to the Official Committee of Unsecured Creditors*.

4. In accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, no agreement or understanding exists between Sidley and any other entity or person, other than members of the Firm, for the sharing of compensation received or to be received for services rendered in or in connection with this Chapter 11 Case.

5. All professional and paraprofessional services for which Sidley is requesting compensation were rendered solely on behalf of the Official Committee of Unsecured Creditors.

[Remainder of page intentionally left blank]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 19, 2021
Chicago, Illinois

/s/ Matthew A. Clemente

Matthew A. Clemente
Sidley Austin LLP

Exhibit C

Fees Statement

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

T A S K D E T A I L

Date	Name	Narrative	Hours
02 Asset Disposition			
03/05/21	A Russell	Review, analyze Dondero proposal re acquisition of HCFMA/NPA assets	.30
03/29/21	A Russell	Review, analyze update re Dondero asset purchase proposal and correspondence re same.	.60
Task Subtotal			.90
05 Committee Meetings			
03/03/21	T Nifong	Participate in UCC call regarding current case issues	.50
03/03/21	J Hoffman	Attend weekly committee meeting regarding current case issues	.50
03/03/21	MA Clemente	Prepare and participate in committee meeting	.60
03/03/21	A Russell	Telephone conference with Sidley, FTI, and Committee re current case issues.	.50
03/03/21	PP Reid	Participate in UCC call regarding various case issues	.50
03/03/21	PH Montgomery	Prepare for and participate in call with UCC regarding status of proceedings	.50
03/03/21	CM Rognes	Attend UCC call regarding current case issues	.50
03/03/21	R Fink	Participate in and take notes on weekly UCC meeting re: confirmation appeal/motion for stay pending appeal, D&O insurance search, and Kirschner retention (.5); revise notes on 3/3/21 UCC meeting (.3); draft email to E. Bromagen re: same (.1)	.90
03/03/21	EA Bromagen	Prepare for and participate in Committee meeting	.60
03/10/21	R Fink	Participate in weekly Highland UCC meeting and take notes re: same	.40
03/10/21	CM Rognes	Attend pre-UCC call with Sidley and FTI regarding UCC call	.40
03/10/21	MA Clemente	Call with the Committee regarding various case issues (.4); review materials for same (.1)	.50
03/10/21	A Russell	Attend weekly committee meeting regarding various case issues	.40
03/10/21	PP Reid	Participate in weekly UCC call regarding various case issues	.40
03/10/21	PH Montgomery	Attend UCC call meeting regarding various case updates	.40
03/10/21	CM Rognes	Attend UCC call regarding various case issues	.40

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/10/21	T Nifong	Participate in UCC call regarding various case issues	.40
03/10/21	EA Bromagen	Call with Committee and advisors re various issues	.40
03/17/21	T Nifong	Participate in weekly UCC call regarding various case issues	.80
03/17/21	MA Clemente	Participate on weekly committee call regarding various case issues (.8); assess various case issues regarding committee call (.2)	1.00
03/17/21	J Hoffman	Attend weekly Committee meeting regarding various case issues	.80
03/17/21	A Russell	Attend weekly Committee meeting regarding various case issues	.80
03/17/21	R Fink	Participate in and take notes on HCM UCC weekly meeting regarding various case issues	.80
03/17/21	PP Reid	Participate in UCC call regarding various case issues	.80
03/17/21	CM Rognes	Attend weekly UCC call regarding various case issues	.80
03/17/21	EA Bromagen	Weekly call with committee and advisors re various issues	.80
03/24/21	MA Clemente	Participate in weekly committee meeting regarding various case issues (.6); review materials for same (.2)	.80
03/24/21	J Hoffman	Attend committee meeting (in part)	.20
03/24/21	A Russell	Attend weekly Committee meeting regarding various case issues	.60
03/24/21	R Fink	Participate in and take minutes of weekly UCC meeting	.60
03/24/21	CM Rognes	Attend weekly UCC call regarding various case issues	.60
03/24/21	T Nifong	Participate in weekly UCC call regarding various case issues	.60
03/24/21	EA Bromagen	Attend weekly Committee call with advisors re various issues (.6); emails with FTI and Committee re agenda for same (.2)	.80
03/31/21	R Fink	Participate in and take minutes on weekly UCC meeting (.5); revise and synthesize meeting minutes re- same (.3)	.80
03/31/21	T Nifong	Participate in weekly UCC standing call (.5); review materials regarding same (.1)	.60
03/31/21	MA Clemente	Participate in weekly committee meeting regarding various case issues	.50
03/31/21	A Russell	Attend weekly Committee meeting (.5); correspond with Sidley team same (.1)	.60
03/31/21	J Hoffman	Attend weekly committee meeting regarding various case issues	.50

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/31/21	PP Reid	Participate in portion of weekly UCC call	.30
03/31/21	PH Montgomery	Attend weekly UCC meeting regarding various case issues	.50
03/31/21	CM Rognes	Attend weekly UCC call regarding various case issues	.50
03/31/21	EA Bromagen	Call with Committee and advisors re various issues (.5); preparation for same (.1)	.60
Task Subtotal			24.50
06 Business Operations			
03/11/21	MA Clemente	Call with J. Seery re: Acis 7 (.3); analysis of issues regarding Acis 7 and Neutra raised by J. Seery (.9)	1.20
03/12/21	MA Clemente	Review materials for call with the board	.30
03/12/21	A Russell	Review, analyze notice to Committee re Acis 7 and Acis CLO transactions.	.30
03/15/21	MA Clemente	Analysis of Acis 7 distributions (.7); review protocols (.4) email with E. Bromagen re: distributions (.1)	1.20
03/15/21	A Russell	Review, analyze update Dondero proposal for purchase of certain assets, Acis 7 transaction.	.30
03/16/21	MA Clemente	Analysis of proposed ACIS 7 CLO distributions	.60
Task Subtotal			3.90
07 Case Administration			
03/01/21	DM Twomey	Confer with M. Clemente regarding appeals update and issues, discussions with J. Pomerantz and related analysis	.40
03/01/21	J Hoffman	Multiple emails with court clerk, Sidley team re: hearing dates for various committee motions	.40
03/01/21	MA Clemente	Call with FTI team re: various issues (.6); call with E. Bromagen re: various issues (.4)	1.00
03/01/21	EA Bromagen	Call with FTI and Sidley teams re various issues	.60
03/02/21	MA Clemente	Emails with E. Bromagen re: committee agenda	.30
03/02/21	EA Bromagen	Emails with M. Clemente and E. Cheng re agenda for Committee meeting	.30
03/03/21	R Fink	Prepare for weekly HCM UCC meeting	.10
03/03/21	CM Rognes	Attend pre-UCC call with Sidley and FTI	.40
03/03/21	DJ Lutes	Prepare electronic files for Sidley team (.2); research docket for same (.1)	.30
03/03/21	J Hoffman	Update case calendar	.20

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/03/21	MA Clemente	Call with S. Starr re: various issues (.1); team call with FTI re: committee meeting (.4); prepare for committee meeting (.9); call with J. Pomerantz re: various issues (.3)	1.70
03/03/21	A Russell	Telephone conference with Sidley and FTI teams to coordinate and prepare for Committee meeting.	.40
03/03/21	EA Bromagen	Email to Committee re agenda for meeting (.1) emails with IT team re distribution list (.1)	.20
03/04/21	DJ Lutes	Review hearing calendar status, case updates (.1); prepare electronic files for Sidley team (.2)	.30
03/04/21	J Hoffman	Update case calendar	.20
03/05/21	DJ Lutes	Review incoming email materials from Sidley team regarding meetings, deadlines and case developments	.30
03/05/21	MA Clemente	Call with J. Seery re: various issues	.50
03/05/21	J Hoffman	Revise notice of appearance (0.2); correspondence with Sidley team re: same (0.2); update case calendar (0.2)	.60
03/08/21	J Hoffman	Correspondence with FTI team re: conflicts check (0.2); research regarding same (0.2); update case calendar (0.2)	.60
03/08/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.80
03/08/21	MA Clemente	Team call (in part) with FTI re: various issues	.50
03/08/21	EA Bromagen	Weekly call (in part) with FTI and Sidley re various issues	.50
03/09/21	R Fink	Revise and consolidate notes on Highland Committee/Board Meeting on 3-9-21 (.3); draft email to E. Bromagen re-same (.1)	.40
03/10/21	R Fink	Revise and synthesize notes re: weekly Highland UCC meeting (.4); draft email to E. Bromagen re: same (.1)	.50
03/10/21	DM Twomey	Phone conference with M. Clemente regarding status update, insurance, effectiveness and appeal issues (.40); briefly review emails regarding case updates/issues (.30)	.70
03/10/21	MA Clemente	Call with FTI and Sidley teams regarding UCC call (.4); prepare for committee meeting (.6); call with D. Twomey regarding case issues and strategies (.4)	1.40
03/10/21	A Russell	Telephone conference with Sidley and FTI teams re preparation and coordination for Committee meeting.	.40
03/10/21	EA Bromagen	Weekly pre call with FTI and Sidley re various issues (.4); emails with M. Clemente re agenda for Committee meeting (.2); emails with R. Fink re scheduling (.2)	.80
03/11/21	DM Twomey	Phone conference with M. Clemente regarding plan	.30

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		effectiveness update, related issues	
03/11/21	MA Clemente	Call with J. Seery re: various issues (.4); call with D. Twomey re: plan effective date (.3)	.70
03/11/21	J Hoffman	Confer with Sidley team re: case management procedures (0.3); correspondence with Sidley litigation team re: strategy for hearing (0.2)	.50
03/12/21	J Hoffman	Correspondence with Sidley team re: case management strategy	.20
03/12/21	R Fink	Prepare for call with HCM directors reviewing directors' presentation materials (.1); revise and synthesize notes on UCC/Directors meeting 3-12-21 (.2)	.30
03/15/21	DJ Lutes	Review materials from Sidley team regarding case update and deadlines	.20
03/15/21	DM Twomey	Correspond with and review email from M. Clemente regarding status update	.30
03/15/21	MA Clemente	Call with J. Seery re: various issues (.4); email to E. Bromagen re: follow up on board call (.1); team call with FTI re: various issues (.5); call with E. Bromagen re: various issues (.4)	1.40
03/15/21	J Hoffman	Confer with Sidley team re: issuance of summons	.20
03/15/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.50
03/15/21	EA Bromagen	Weekly call with FTI and Sidley teams (.5); call with G. Demo re various issues (.3); emails with M. Clemente re same (.3); discuss various issues with M. Clemente (.4)	1.50
03/16/21	J Hoffman	Correspondence with court, Sidley team re: hearing settings (0.2); research requirements for supplemental conflicts check (0.3); confer with D. Lutes re: same (0.2)	.70
03/16/21	MA Clemente	Call with D. Pauker re: update and current situation (.4); call with E. Bromagen re: various issues (.3); review agenda items for committee call (.1)	.80
03/17/21	R Fink	Revise and synthesize notes on HCM UCC weekly meeting (.3); draft email to E. Bromagen re- same (.1)	.40
03/17/21	CM Rognes	Attend pre-UCC call (in part) with Sidley and FTI	.20
03/17/21	MA Clemente	Team call with FTI re: committee call prep (.3); prepare for committee call (1.4); call with E. Bromagen regarding various case issues (.3)	2.00
03/17/21	J Hoffman	Correspondence with Sidley team re: Writ of mandamus (0.2); research re: same (0.2); correspondence with Sidley team re: adversary matters (0.4)	.80

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/17/21	A Russell	Telephone conference with Sidley and FTI teams to prepare and coordinate for Committee meeting.	.30
03/17/21	EA Bromagen	Call with M. Clemente re various issues (.3); call with FTI and Sidley teams in advance of weekly committee call (.3)	.60
03/18/21	R Fink	Research and compile filings related to motion for stay of confirmation order	.30
03/18/21	DJ Lutes	Review incoming motions and hearing agendas for case developments (.3); prepare electronic files for same (.1)	.40
03/18/21	J Hoffman	Confer with debtor counsel, Sidley team re: hearing details for 3/19 hearing (0.2); multiple emails with Sidley team, committee members re: hearing details (0.4); multiple emails with KCC team re: new service requirements (0.2)	.80
03/18/21	MA Clemente	Conference with D. Twomey re: stay and various issues	.40
03/18/21	EA Bromagen	Email to Committee re various filings and case update (.3); correspond with M. Clemente re various issues (.1)	.40
03/19/21	J Hoffman	Confer with C. Rognes re: filing strategy (0.4); finalize and file motion to continue (0.4); finalize and upload related order (0.2); finalize and file witness and exhibit list (0.4)	1.40
03/19/21	MA Clemente	Call with J. Seery re: various issues (.4); call with J. Pomerantz re: various issues (.3)	.70
03/19/21	EA Bromagen	Call with FTI, Sidley and Pachulski teams re D&O insurance and related issues (.9); correspond with M. Clemente re various issues (.2)	1.10
03/21/21	MA Clemente	Email with A. Russell re: recusal motion	.10
03/21/21	EA Bromagen	Emails with J. Hoffman re case scheduling	.10
03/22/21	DJ Lutes	Review docket and emails for case developments and timing (.1); prepare electronic files for Sidley team regarding same (.1)	.20
03/22/21	J Hoffman	Emails with court re: hearing continuance and related requirements	.20
03/23/21	R Fink	Review email from Court regarding findings related to stay briefings and cancellation of stay hearing	.10
03/23/21	DJ Lutes	Call with E. Bromagen regarding case administrative tasks (.3); prepare excel and related materials for same (.5); review calendar, deadlines and recusal materials for updates (.2)	1.00
03/23/21	J Hoffman	Finalize and file supplemental objection (0.3); update case calendar (0.3); correspondence with KCC, Sidley teams re: service requirements (0.3); draft CNOs (0.4)	1.30

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/23/21	MA Clemente	Address committee issues (.4); call with J. Seery re: various issues (.3)	.70
03/24/21	R Fink	Revise and synthesize UCC meeting minutes (.3); email to E. Bromagen re: same (.1)	.40
03/24/21	CM Rognes	Attend pre-UCC call with Sidley and FTI	.30
03/24/21	MA Clemente	Team call with FTI re: various issues (.3); prepare for FTI and committee call (.9)	1.20
03/24/21	A Russell	Telephone conference with Sidley and FTI teams to prepare and coordinate for Committee meeting.	.30
03/24/21	EA Bromagen	Weekly call with Sidley and FTI team re various issues (.3); emails with FTI and M. Hankin re debtor projections (.2)	.50
03/25/21	DJ Lutes	Review correspondence from Sidley team regarding meetings, case updates and calendar (.2); prepare electronic files for E. Bromagen regarding case administrative tasks (.3)	.50
03/26/21	R Fink	Revise and synthesize meeting minutes on HCM Directors/UCC meeting 3-26-21	.20
03/26/21	MA Clemente	Call with E. Bromagen re: board call (.3); detailed email from E. Bromagen re: board call (.2)	.50
03/26/21	J Hoffman	Revise and file CNOs (0.4); review new case pleadings (0.4); update case calendars for Sidley team (0.4)	1.20
03/26/21	EA Bromagen	Email summary re Board and Committee and advisors meeting to M. Clemente (.3); discuss same with M. Clemente (.3)	.60
03/29/21	DJ Lutes	Prepare electronic materials for case administrative tasks (.2); review calendar and deadlines (.1); emails with S. Caputo regarding same (.2)	.50
03/29/21	MA Clemente	Team call with FTI re: various issues (.8); call with J. Pomertantz re: various issues (.4); call with E. Bromagen re: various issues (.3)	1.50
03/29/21	J Hoffman	Confer with Sidley team re: deposition notices	.30
03/29/21	A Russell	Telephone conference with Sidley and FTI team re current case issues.	.80
03/29/21	EA Bromagen	Weekly call with FTI team and Sidley team re various issues	.80
03/29/21	EA Bromagen	Call with M. Clemente re various issues	.30
03/30/21	DM Twomey	Emails with team regarding proceedings schedule, agenda, recent pleadings	.30
03/30/21	MA Clemente	Emails with E. Bromagen re: call agenda (.2); call with E. Bromagen re: various issues (.3); call with J. Pomerantz re: various issues (.3)	.80

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/30/21	EA Bromagen	Emails with M. Clemente re: Committee call agenda (.2); call with M. Clemente re: various issues (.3) review of case calendar and email to Committee re same (.4) emails with J. Hoffman re notifications of filings and filing notices of appearance (.3)	1.20
03/31/21	R Fink	Prepare for and review relevant materials and emails for weekly UCC call	.10
03/31/21	MA Clemente	Meeting prep call with FTI (.5); prepare for committee meeting (1.0)	1.50
03/31/21	A Russell	Telephone conference with Sidley and FTI team to prepare and coordinate for Committee call (.5); correspond with E. Bromagen and creditor re inquiry re case (.1)	.60
03/31/21	EA Bromagen	Call with FTI and Sidley in preparation of Committee call re various issues	.50
Task Subtotal			50.80
08 Claims Administration and Objections			
03/10/21	MA Clemente	Assess overall strategy and timing relative to Kirschner and claims	.80
03/13/21	EA Bromagen	Emails with S. Advani and D. Steinberg re tax distribution claims	.10
03/16/21	MA Clemente	Review tax claims by employees (.3); assess interrelation with Hunton request (.7)	1.00
03/16/21	EA Bromagen	Emails with G. Demo re Hunton tax distribution claims issue	.20
03/16/21	EA Bromagen	Draft email summary of Hunton retention issue re tax distribution claims to Committee (.4); emails with M. Clemente re same (.1)	.50
03/17/21	EA Bromagen	Discuss tax distribution claims with G. Demo (.2); review of tax distribution claims (.5); emails with G. Demo re same (.2); emails with E. Cheng re same (.2)	1.10
03/18/21	MA Clemente	Review claim purchase notices (.3); analysis of Dondero strategy in claim purchases (.5); review omnibus claims objection (.4)	1.20
03/18/21	EA Bromagen	Emails with G. Demo re tax distribution claims (.2); review omnibus objection to claims filed by Debtor (.4)	.60
03/19/21	A Russell	Review, analyze omnibus objection to employee claims and correspond with Sidley team re same	.40
03/23/21	A Russell	Review update and correspondence re confidential claim matter.	.40

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/25/21	MA Clemente	Review claim transfers (.2); implications of claim transfers (.4)	.60
03/25/21	EA Bromagen	Emails with M. Hankin and FTI re claims makeup (.3); review of summary of same (.3)	.60
03/29/21	EA Bromagen	Call with G. Demo re tax distribution claims (.2); email to G. Demo re same (.3) review of tax claims filed (.4); emails with FTI re same (.1)	1.00
Task Subtotal			8.50
09 Corporate Governance and Board Matters			
03/02/21	EA Bromagen	Emails with FTI and Alliant team re D&O search (.2); review of quote (.3)	.50
03/04/21	TD Cunningham	Review new D&O proposals for HCM (0.7); attend call with FTI and Alliant re: D&O wordings and potential next steps (0.8); email exchange with M. Clemente re: CNA policy and next steps (0.2)	1.70
03/05/21	TD Cunningham	Email exchange with M. Clemente re: CNA quote on D&O insurance renewal and potential next steps	.20
03/09/21	R Fink	Participate in and take notes on Highland Committee/Board Meeting 3-9-21	.80
03/09/21	PP Reid	Participate in call with Board update call to committee regarding Dondero proposal (.9); emails with professionals regarding same regarding same (.2)	1.10
03/09/21	MA Clemente	Attend call with the Board update call to committee	.80
03/09/21	PH Montgomery	Attend (in part) Board update call to the committee	.60
03/09/21	A Russell	Telephone conference with Sidley, FTI, Pachulski, DSI, Committee and Independent Directors re Board update to committee.	.90
03/09/21	EA Bromagen	Call with UCC and Board re various plan related issues	.90
03/12/21	R Fink	Participate in and take notes on HCM UCC/Directors call	1.10
03/12/21	PP Reid	Participate (in part) in board call to Committee	.90
03/12/21	MA Clemente	Call with Board re: liquidity and effective date	1.10
03/12/21	A Russell	Telephone conference with Sidley, FTI, DSI, Pachulski, Committee, and Independent Directors re weekly presentation of Board to Committee.	1.10
03/12/21	EA Bromagen	Call with Board and UCC re various plan related issues	1.10
03/17/21	A Russell	Review, analyze update re D&O coverage.	.30
03/19/21	A Russell	Telephone conference with Board, Committee and advisors re weekly Board update to Committee (.8); review materials for	.90

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		same (.1)	
03/19/21	MA Clemente	Attend Board call with the Committee regarding updates	.80
03/19/21	PP Reid	Participate in board/UCC meeting regarding weekly update	.90
03/19/21	EA Bromagen	Call with Board and Committee re various issues	.80
03/23/21	R Fink	Review UCC Bylaws and UST questionnaire for UCC members	.40
03/23/21	TD Cunningham	Review final correspondence prior to submitting requests to D&O underwriters and comments thereon	.40
03/23/21	A Russell	Correspond with E. Bromagen and M. Clemente re D&O insurance policy follow up.	.20
03/26/21	R Fink	Attend and take minutes on HCM directors/UCC meeting regarding board update to committee	.50
03/26/21	A Russell	Telephone conference with Sidley, FTI, Pachulski, DSI, Independent Directors and Committee members re Board's weekly update to Committee.	.50
03/26/21	EA Bromagen	Call with Board and Committee and advisors re various plan related effective date issues	.50
03/29/21	TD Cunningham	Email update on D&O policy issues	.10
Task Subtotal			19.10
11 Retention			
03/01/21	MA Clemente	Address Kirchner retention strategy	.40
03/01/21	EA Bromagen	Review and revision of Teneo retention application (.6); further review and revision of same (1.2)	1.80
03/02/21	MA Clemente	Emails with Kirschner re: retention timing (.3); address Kirschner retention issues (.3)	.60
03/03/21	EA Bromagen	Further review of Teneo draft application	.20
03/11/21	DJ Lutes	Confer with J. Hoffman regarding supplemental connection searches and disclosures (.2); prepare supplemental parties of interest materials for A. McGarry and S. Frye regarding same (1.7); emails with M. McGarry regarding the same (.2)	2.10
03/11/21	J Hoffman	Confer with D. Lutes re: strategy for connections check (0.2); review conflicts list from debtor (0.2); correspondence with FTI team re: same (0.2)	.60
03/12/21	DJ Lutes	Analyze parties of interest connections and supplemental conflict reports (1.8); emails with A. McGarry regarding same (.1); prepare tracker summary materials for conflict reports (1.4)	3.30

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/15/21	DJ Lutes	Analyze parties of interest connections and supplemental conflict reports (3.1); emails with A. McGarry regarding same (.2); prepare tracker summary report for supplemental conflict searches (1.0)	4.30
03/15/21	MA Clemente	Address Hunton email from E. Bromagen (.2); review Hunton role and tax issues (.4)	.60
03/16/21	DJ Lutes	Analyze incoming supplemental conflict reports (5.1); emails with J. Hoffman and A. McGarry regarding same (.2)	5.30
03/16/21	MA Clemente	Review Kirschner retention application	.40
03/17/21	DJ Lutes	Analyze incoming supplemental conflict reports (2.3); emails with S. Frye and J. Hoffman regarding same (.2); prepare spreadsheet summaries of supplemental reports (1.0); confer with J. Hoffman regarding same (.3)	3.80
03/17/21	J Hoffman	Confer with D. Lutes re: conflicts/connections check (0.3); review conflicts/connections report (0.3); revise FTI declaration (0.2); finalize and file same (0.3)	1.10
03/18/21	DJ Lutes	Analyze incoming supplemental conflict reports (4.2); emails with A. McGarry regarding same (.3); prepare spreadsheet tracker summaries for supplemental conflicts (.8)	5.30
03/19/21	DJ Lutes	Analyze supplemental connection conflict searches including finalization of summaries for same (2.5); emails with J. Hoffman regarding same (.2)	2.70
03/19/21	J Hoffman	Correspondence with D. Lutes re: conflicts/connections updates	.20
03/23/21	DJ Lutes	Prepare connections summary materials (.6); emails with J. Hoffman regarding same (.1); call with J. Hoffman regarding same (.5)	1.20
03/23/21	MA Clemente	Revisions to Kirschner retention application (.5); email and call with E. Bromagen re: retention application (.2)	.70
03/23/21	J Hoffman	Call with D. Lutes re: connections review (0.5); begin connections review (0.5)	1.00
03/23/21	EA Bromagen	Emails and discussion with M. Clemente re Teneo retention	.20
03/25/21	MA Clemente	Revisions to Kirschner retention application	.40
03/25/21	J Hoffman	Analyze connections report (1.0); prepare declaration in connection with same (0.3)	1.30
03/31/21	DJ Lutes	Prepare exhibits to supplemental declaration for retention (2.7); emails with J. Hoffman regarding same (.2); research materials for same (1.1)	4.00

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/31/21	J Hoffman	Confer with D. Lutes re: supplemental declaration requirements (0.2); revise supplemental declaration (0.3)	.50
Task Subtotal			42.00
12 Fee Applications			
03/01/21	J Hoffman	Confer with FTI team re: fee application filing (0.2); review, revise FTI fee application (0.6); correspondence with Committee re: same (0.1)	.90
03/02/21	J Hoffman	Finalize and file monthly fee application	.30
03/03/21	DJ Lutes	Prepare monthly fee application materials for January and February (1.0); email to S. Caputo regarding same (.1)	1.10
03/03/21	J Hoffman	Revise FTI Fee application (0.2); finalize and file fee application (0.3)	.50
03/04/21	DJ Lutes	Prepare monthly fee application materials (.7); emails with S. Caputo regarding same (.2)	.90
03/05/21	DJ Lutes	Prepare monthly fee application materials and exhibits	1.20
03/05/21	J Hoffman	Draft and file CNO for fee application	.40
03/08/21	DJ Lutes	Prepare monthly fee application materials and exhibits	2.70
03/09/21	DJ Lutes	Prepare monthly fee application materials and exhibits (3.5); emails with S. Caputo regarding same (.1)	3.60
03/10/21	DJ Lutes	Prepare monthly fee application exhibits and materials (2.9); emails with S. Caputo regarding same (.1); prepare electronic files regarding same (.2)	3.20
03/11/21	DJ Lutes	Prepare monthly fee application exhibits and materials	.30
03/15/21	DJ Lutes	Review monthly fee application materials and costs (.5); emails with S. Caputo regarding same (.1)	.60
03/16/21	DJ Lutes	Review electronic files regarding fee application status and related tasks (.2); prepare monthly fee application materials (.2)	.40
03/18/21	DJ Lutes	Prepare monthly fee application materials	.30
03/19/21	DJ Lutes	Prepare monthly fee application materials (.9); email with M. Clemente regarding same (.1); emails with S. Caputo and J. Hoffman regarding same (.2); prepare interim fee application spreadsheets (1.4)	2.60
03/22/21	DJ Lutes	Prepare monthly fee application materials and exhibits (.5); emails with S. Caputo regarding same (.2); prepare interim fee application materials (2.0)	2.70
03/23/21	DJ Lutes	Prepare monthly fee application materials and exhibits (.4); prepare interim fee application materials and exhibits (.5);	1.10

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		emails with S. Caputo regarding same (.2)	
03/24/21	DJ Lutes	Prepare February, March monthly and interim fee applications (2.6); emails and call with S. Caputo regarding same (.2); prepare electronic files for same (.1)	2.90
03/24/21	J Hoffman	File CNO for Sidley fee application (0.3); discuss deposition details with Sidley team (0.3); draft analysis for scheduling order (0.5); review new case pleadings for internal updates (0.3)	1.40
03/26/21	DJ Lutes	Prepare monthly and interim fee application materials	.50
03/29/21	DJ Lutes	Prepare monthly and interim fee applications (4.2); prepare spreadsheets for interim (.7); emails with P. Foley regarding privilege review (.1); prepare materials for same (.3); emails with S. Caputo regarding fee application issues (.2); emails with E. Bromagen regarding same (.1)	5.60
03/29/21	MA Clemente	Review fee application (.4); email from D. Lutes re: fees (.1)	.50
03/30/21	DJ Lutes	Prepare 5th interim fee application and exhibits (3.9); research blended rates and emails to A. Herbstman regarding same (.3); emails with P. Foley regarding privilege review (.1); review materials regarding same (.3); emails with S. Caputo regarding same (.2)	4.80
03/31/21	DJ Lutes	Prepare February and March monthly fee application materials and exhibits (.5); email to M. Clemente regarding same (.1); prepare interim fee application materials (.2)	.80
Task Subtotal			39.30
14 Litigation			
03/01/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); draft emails to E. Bromagen and FTI team re-same (.1)	.30
03/01/21	T Nifong	Prepare chronology re: Hunter Mountain Transaction	1.10
03/01/21	CM Rognes	Correspond with P. Montgomery re: service (0.2); correspond with J. Hoffman re: correspondence from clerk (0.1)	.30
03/01/21	M Abdul-Jabbar	Participate in professional call with FTI and Sidley regarding pending adversarial claims	.60
03/01/21	J Hoffman	Draft notice of service (0.8); research re: Hague convention service requirements (1.2); correspondence with Sidley litigation team re: adversary hearing dates (0.2); research re: intervention requirements (0.7); call with P. Montgomery to discuss Debtor proposal (0.2); research rules regarding preservation motion (0.3)	3.40
03/01/21	MA Clemente	Prepare strategy regarding timing of motion to compel and	.50

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		sanctions	
03/01/21	PP Reid	Participate in call with FTI regarding various issues (.6); emails Sidley team regarding Dondero preservation order (.3); review Hunter Mountain chronology (.4)	1.30
03/01/21	PH Montgomery	Call with FTI regarding outstanding work streams and preparation for UCC meeting (.6); communications with Sidley team regarding proposed revised preservation order (.3); communications with Dondero counsel regarding preservation (.5); call with J. Morris regarding scheduling issues (.1); communications with debtor regarding document preservation issues (.5); coordinate review of MGM production (.3)	2.30
03/01/21	PG Foley	UCC professionals' call with FTI and Sidley teams regarding various issues	.60
03/02/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.1); draft email to E. Bromagen regarding same (.1)	.20
03/02/21	T Nifong	Review documents re: 2/25 MGM production	2.40
03/02/21	CM Rognes	Draft proof of service (0.3); review local rules re: proof of service (0.2); research re: service (0.5); correspond with J. Hoffman re: notice of hearing (0.2); review, revise correspondence to clerk re: notice of hearing (0.1); review laptop sale list (0.1); calculate CLO Holdco response deadlines (0.2); correspond with P. Montgomery re: laptop sale list (0.1)	1.70
03/02/21	J Hoffman	Research re: AP requirements for committee notice (0.5); revise notice for service in AP (0.3); confer with C. Rognes re: revisions to same (0.2); correspondence with Sidley litigation team re: strategy for notice and service of pleadings (0.3)	1.30
03/02/21	PP Reid	Emails regarding adversary proceeding against Dugaboy (.2); emails and telephone conference with Debtor's counsel regarding laptop transfers proposed by Debtor (.3)	.50
03/02/21	PH Montgomery	Communications with Sidley team regarding service issues (.3); review of communications produced by objectors and related communications (.2); communications with Debtor re preservation issues (.4); review and revise statement regarding adversary proceeding (.3)	1.20
03/02/21	A Russell	Review, analyze update re schedule re appeals and motions to stay pending appeal (.2); review, analyze Dondero motion to continue (.2); correspond with Sidley team re employee list for document preservation (.3).	.70
03/02/21	D Griffith	Perform business research for C. Rognes	.50
03/03/21	CM Rognes	Review, summarize opposition re: motion to preserve evidence (0.5); draft proofs of service (0.3); research re: trusts (1.5);	2.70

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		correspond with P. Montgomery re: service (0.4)	
03/03/21	T Nifong	Participate in standing Sidley/FTI teams pre-UCC call	.40
03/03/21	J Hoffman	Revise statement in response for AP (0.3); finalize and file statement (0.2); revise notice of appearance (0.2); research re: intervention requirements (0.8); confer with Sidley litigation team re: response deadlines (0.2); analyze objection to preservation motion (0.3); analyze appeal pleadings (0.7); review local rules for pleading requirements (0.3); review proof of service for adversary (0.2)	3.20
03/03/21	PP Reid	Participate in professionals call in preparation for UCC call (.4); review Dondero's objection to preservation motion (.4); emails with Sidley team regarding same (.2)	1.00
03/03/21	PH Montgomery	Prepare for and participate in call with FTI regarding UCC meeting (.4); call with C. Rognes regarding service issues (.3); review and revise statement regarding adversary status (.5)	1.20
03/03/21	PG Foley	Attend UCC professionals' call with Sidley and FTI regarding case issues	.40
03/03/21	A Russell	Review, analyze amended deposition notices (.2); correspond with J. Hoffman re updating litigation schedule re same (.1); review, analyze notices of appeal and motions to stay pending appeal (.6)	.90
03/04/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.10
03/04/21	CM Rognes	Correspond with opposing counsel re: service	.10
03/04/21	J Hoffman	Advise litigation team of proofs of service procedure	.20
03/04/21	MA Clemente	Assess questions and issues regarding statute of limitations	.40
03/04/21	PP Reid	Emails with Sidley team regarding reply to Dondero's preservation objection	.20
03/04/21	DM Twomey	Correspond with M. Clemente regarding emergence, statute of limitation issues, related questions (.30); emails with team regarding same (.20)	.50
03/04/21	PH Montgomery	Communications with C. Rognes regarding reply to motion for preservation and service issues (.3); communications with Sidley team regarding bankruptcy claims issues (.7); review and revise draft stipulation regarding privilege issues (2.1)	3.10
03/04/21	A Russell	Correspond with Sidley team re tolling of statutes of limitations re estate claims.	.20
03/05/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.10

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/05/21	CM Rognes	Revise stipulation re: privilege (0.5); correspond with P. Montgomery re: privilege stipulation (0.1); correspond with T. Nifong re: preservation motion reply (0.1)	.70
03/05/21	T Nifong	Draft reply motion to Dondero's response to motion to compel preservation	.40
03/05/21	MA Clemente	Update email with M. Kirschner	.20
03/05/21	J Hoffman	Confer with Sidley team re: proofs of service (0.2); review rules regarding same (0.1)	.30
03/05/21	PH Montgomery	Communications with pricing committee regarding Highland pitch	.40
03/05/21	A Russell	Correspond with Sidley team re stipulation with Debtor re preservation of privilege	.20
03/07/21	CM Rognes	Research re: service	1.10
03/08/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.3); draft emails to FTI and E. Bromagen re same (.1)	.40
03/08/21	T Nifong	Draft reply to Dondero's objection to motion to compel preservation	7.70
03/08/21	T Nifong	Confer with C. Rognes regarding draft reply to Dondero's objection to motion to compel preservation	.30
03/08/21	CM Rognes	Attend UCC professionals call (in part) with Sidley and FTI regarding current case issues (0.5); correspond with FTI and P. Montgomery re: data preservation (0.3); draft proof of service (0.2); research re: service (1.0); correspond with T. Nifong re: reply in support of motion to preserve (0.3); correspond with J. Hoffman re: service (0.4); correspond with FTI re: adversary proceedings (0.2); correspond with P. Montgomery re: service (0.1)	3.00
03/08/21	J Hoffman	Review, analyze appeal documents (0.3); call with C. Rognes to discuss service issues (0.4); research regarding proof of claim jurisdiction issues (0.9)	1.60
03/08/21	PP Reid	Participate in call with FTI and Sidley teams regarding current case issues and preservation issues (.8); emails with FTI and Sidley teams regarding same (.2); emails with FTI and Sidley regarding document preservation issues (.4); review draft stipulation with Debtor regarding privilege materials (.2)	1.60
03/08/21	PH Montgomery	Call with FTI and Sidley teams (in part) regarding document preservation and other issues	.70
03/08/21	M Abdul-Jabbar	Confer with bankruptcy team regarding adversary proceeding against Dondero, D&O insurance, and related litigation issues	.50

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/08/21	MA Clemente	Evaluate issues with preservation motion (.3); assess timing for Kirscher retention (.2); strategy regarding related party notes (.7)	1.20
03/08/21	PG Foley	Attend UCC professionals call with FTI and Sidley teams regarding various case issues	.80
03/09/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
03/09/21	CM Rognes	Draft litigation task list (0.2); research re: service (1.0); correspond with P. Montgomery re: service (0.1)	1.30
03/09/21	J Hoffman	Analyze case law in connection with service on foreign corporation (0.3); research re: same (0.3)	.60
03/09/21	T Nifong	Draft reply to Dondero's objection to motion to compel preservation	3.10
03/09/21	MA Clemente	Analysis of debtor strategy on related party notes including acceleration (.8); review various materials from P. Daugherty (.5)	1.30
03/09/21	PH Montgomery	Call with C. Rognes regarding service issues (.2); communications with P. Reid regarding stipulation (.1) communications with C. Rognes and J. Hoffman regarding motion for preservation (.3); communications with A. Russell and others regarding legal research (.3)	.90
03/09/21	A Russell	Review, analyze stipulation re preservation of privilege (.3); correspond with Sidley team re same (.1).	.40
03/10/21	R Fink	Research and revise summary and schedule of pending HCM adversary/appellate proceedings and claims objection/motion to stay (.5); draft email to E. Bromagen re: same (.1)	.60
03/10/21	CM Rognes	Update litigation task list (0.1); correspond with P. Montgomery, FTI, DSI and Debtor's counsel re: data preservation and accounting information (0.6); correspond with P. Montgomery re: CLO Holdco answer deadline (0.1); review, analyze federal rules re: amending pleadings (0.3)	1.10
03/10/21	T Nifong	Participate in Standing Sidley/FTI pre-UCC call	.40
03/10/21	PP Reid	Participate in professional call with FTI and Sidley teams regarding UCC call (.4); review data preservation issues (.2)	.60
03/10/21	J Hoffman	Finalize and file notices of appearance (0.4); review writ of mandamus (0.2); research re: intervention requirements (0.4); review rules for answer requirements to advise Sidley team (0.2)	1.20
03/10/21	PH Montgomery	Participate in FTI and Sidley team call regarding UCC call (.4); call with DSI regarding data preservation (.6) communications	1.10

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		with team regarding stipulation issues (.1)	
03/10/21	A Russell	Correspond with P. Montgomery re 2004 depositions (.2); review, analyze Dondero motion to continue contempt hearing (.4); correspond with Sidley team re same, Dondero's writ of mandamus to Fifth Circuit (.3).	.90
03/10/21	PG Foley	Attend UCC professionals call with FTI and Sidley teams regarding UCC call (.4); related correspondence with Sidley and FTI teams regarding same (.1)	.50
03/11/21	R Fink	Research and revise summary and schedule of pending HCM proceedings to include newly filed appeals	.40
03/11/21	CM Rognes	Revise reply in support of motion to preserve (1.4); correspond with P. Montgomery re: CLO Holdco answer deadline (0.1)	1.50
03/11/21	T Nifong	Draft reply to Dondero's objection to Committee's motion to compel preservation	3.20
03/11/21	MA Clemente	Address emails regarding preservation order (.3); email from M. Kirschner re: status (.1)	.40
03/11/21	PH Montgomery	Correspond with C. Rognes and J. Hoffman regarding hearings and notice issues	.40
03/11/21	A Russell	Correspond with Sidley team re objection to motions to stay confirmation order pending appeal.	.30
03/12/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); draft email to E. Bromagen re same (.1)	.30
03/12/21	CM Rognes	Draft reply in support of preservation motion (3.7); correspond with T. Nifong re: reply in support of preservation motion (0.1)	3.80
03/12/21	T Nifong	Draft response to Dondero's objection to Committee's motion to compel	.80
03/12/21	MA Clemente	Call with M. Kirschner re: various issues (.3); email to Dondero team following up on voicemail (.1)	.40
03/12/21	A Russell	Review, revise omnibus objection to motions to stay confirmation order (.9); correspond with Sidley team re same, finalization for filing (.3).	1.20
03/12/21	J Hoffman	Review joinder to stay motions (0.3); finalize and file same (0.3)	.60
03/15/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.1); draft email to FTI re same (.1)	.20
03/15/21	PH Montgomery	Communications with C. Rognes and J. Hoffman regarding service issues	.50

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/15/21	M Abdul-Jabbar	Participate in professional strategy meeting regarding discovery data and litigation trust issues	.50
03/15/21	CM Rognes	Research re: service (1.6); attend weekly professionals call with Sidley and FTI (0.5); correspond with P. Montgomery re: service (0.2); correspond with J. Hoffman re: summons (0.1); review deadlines re: CLO Holdco adversary (0.1); review pleadings re: CLO Holdco adversary (0.2); correspond with N. Cade re: service (0.1)	2.80
03/15/21	PG Foley	Attend (in part) UCC professionals call with FTI and Sidley teams	.20
03/15/21	A Russell	Correspond with Sidley team re research re tolling of statute of limitations (.3); review, analyze joint motion to certify confirmation appeal to 5th Circuit and order entering same (.4).	.70
03/16/21	R Fink	Research limitations issues re: assigned claims (2.4); draft emails to E. Bromagen re same (.4)	2.80
03/16/21	R Fink	Research limitations extension (1.4); draft emails to E. Bromagen re-same (.2)	1.60
03/16/21	CM Rognes	Update litigation task list (0.2); correspond with P. Montgomery re: preservation motion hearing and stipulation (0.3); correspond with T. Nifong re: preservation motion (0.1); research re: service (0.5); review, update response deadlines re: CLO Holdco complaint (0.1); correspond with FTI re: data preservation (0.1); correspond with Debtor's counsel re: stipulation and data preservation (0.1)	1.40
03/16/21	J Hoffman	Confer with Sidley team re: strategy for preservation motion (0.3); confer with Sidley team re: 1109, Committee standing issues (0.2); research re: 1109 issues (0.4); research in connection with standing in appeals (0.4); draft amended notice of hearing (0.4); review, revise FTI supplemental declaration (0.8); review appeals pleadings in connection with related research (0.3)	2.80
03/16/21	MA Clemente	Call with M. Kirschner re: various issues	.40
03/16/21	A Russell	Correspond with Sidley team re research re tolling of statute of limitations and transfer of estate claims.	.30
03/16/21	EA Bromagen	Review of motion for direct certification and emails with M. Clemente re same (.3); emails with J. Hoffman re appeals process (.2); emails with M. Clemente re adversary proceedings re notes (.2)	.70
03/17/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
03/17/21	CM Rognes	Research re: service (0.5); correspond with J. Hoffman re:	1.00

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		service (0.1); correspond with M. Clemente re: CLO Holdco adversary response deadline (0.1); correspond with P. Montgomery re: CLO Holdco adversary response deadline (0.1); update litigation task list (0.2)	
03/17/21	PP Reid	Participate in professional call with Sidley and FTI teams regarding UCC call (.3); analyze CLO Holdco issues (.4)	.70
03/17/21	MA Clemente	Emails with DC Sauter re: extension (.2); review privilege stipulation (.4); address emails re: CLOH adversary proceeding (.3)	.90
03/17/21	J Hoffman	Research matters on appeal (1.1); analyze case law re: same (0.8); draft analysis for Sidley team re: same (0.4); draft motion to continue (0.8); draft proposed order (0.3)	3.40
03/17/21	A Russell	Review, analyze status of Dondero's writ of mandamus and correspond with Sidley team re same	.40
03/18/21	CM Rognes	Draft proof of service (0.2); research re: motion response deadlines (0.4); correspond with P. Montgomery re: CLO Holdco adversary strategy (0.4); update litigation task list (0.4); correspond with J. Hoffman re: continuance of hearing (0.1); correspond with J. Hoffman re: CLO Holdco response deadline (0.1); correspond with Debtor's counsel re: stipulation (0.1); review motion for recusal (0.3); review motion to stay pleadings (0.2)	2.20
03/18/21	C Clark	Assemble and electronically file proof of service with appendix	.60
03/18/21	J Hoffman	Research re: service deadlines, related rules (0.3); confer with C. Rognes re: same (0.2)	.50
03/18/21	MA Clemente	Read recusal motion (.9); analysis of implications and strategy of recusal motion (1.1); prepare for stay hearing (2.0); emails with P. Montgomery, P. Reid, A. Russell and E. Bromagen re: recusal and related issues (.5); analysis of Dondero standing issues (.9)	5.40
03/18/21	A Russell	Review, analyze Dondero motion to recuse judge and related filings (2.1); correspond with Sidley team re same (.2).	2.30
03/18/21	PH Montgomery	Call with C. Rognes regarding service issues and other adversary issues	.40
03/18/21	EA Bromagen	Review motion to recuse	.50
03/19/21	R Fink	Conference with Sidley team regarding recusal motion	.80
03/19/21	PP Reid	Participate in portion of hearing on motion for stay effective date (.4); review motion to disqualify (.2); telephone conference (in part) with team regarding hearing on bond issued for stay (.5)	1.10

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/19/21	CM Rognes	Attend stay hearing (in part) (1.7); correspond with P. Montgomery re: motion to continue preservation hearing (0.1); correspond with J. Hoffman re: motion to continue preservation hearing (0.2); review motion to continue preservation hearing (0.1)	2.10
03/19/21	R Fink	Attend virtually HCM hearing on motion to stay pending appeal	2.80
03/19/21	J Hoffman	Attend hearing (in part) on stay motions	2.40
03/19/21	A Russell	Attend hearing on motions to stay effectiveness of confirmation order pending appeal (2.9); review filed materials re same (.4); correspond with Sidley team re issues re follow up from hearing and next steps (.9); telephone conference with Sidley team re same, strategy for supplemental briefing (.8)	5.00
03/19/21	PH Montgomery	Attend hearing (in part) regarding stay motion (.4); call with team regarding open issues (.8)	1.20
03/19/21	MA Clemente	Participate in stay hearing (2.9); prepare for stay hearing (1.5)	4.40
03/19/21	DM Twomey	Review recusal motion, related analysis	.80
03/21/21	MA Clemente	Analysis of recusal motion (.8); email with M. Kirschner re: update (.1)	.90
03/22/21	CM Rognes	Attend contempt hearing (in part) (0.5); correspond with E. Bromagen re: deposition transcript (0.1)	.60
03/22/21	J Hoffman	Attend hearing (in part) on contempt motion (7.1); call with P. Montgomery to discuss deadline extensions (0.1); correspondence with opposing counsel re: same (0.1); discuss adversary strategy with C. Rognes (0.3)	7.60
03/22/21	PP Reid	Participate (in part) in contempt hearing	7.20
03/22/21	A Russell	Attend and observe hearing re motion to find J. Dondero in contempt of TRO.	7.50
03/22/21	PH Montgomery	Attend contempt hearing	7.50
03/22/21	MA Clemente	Participate in contempt hearing	7.50
03/22/21	EA Bromagen	Attend hearing on contempt motion	7.50
03/23/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
03/23/21	CM Rognes	Correspond with P. Montgomery re: CLO Holdco adversary proceeding response deadlines (0.3); review, revise, and docket response deadlines (0.2); correspond with J. Hoffman re: hearing transcript (0.2); research re: appellate standard of review (0.1)	.80

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/23/21	J Hoffman	Review Committee supplemental objection (0.4); revise notice of hearing (0.2); finalize and file same (0.3)	.90
03/23/21	MA Clemente	Participate in Seery deposition (1.5); call with M. Kirschner re: various issues (.4)	1.90
03/23/21	A Russell	Attend and observe deposition of J. Seery re supplemental motion to stay hearing (1.4); review, analyze order denying motion to recuse judge (.4); correspond with Sidley team re same (.2); review, analyze court correspondence re 3/24 hearing (.2).	2.20
03/23/21	PH Montgomery	Communications with J. Hoffman regarding notices of hearing and related issues (.2); communications with opposing counsel regarding answer dates (.2); communications with team regarding appeal standards (.2)	.60
03/24/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); email to E. Bromagen re- same (.1)	.30
03/24/21	R Fink	Attend (in part) virtually HCM contempt hearing	1.80
03/24/21	CM Rognes	Revise response deadlines (0.1); correspond with P. Montgomery re: extensions (0.2)	.30
03/24/21	DM Twomey	Phone conference with M. Clemente regarding hearing update, claims transfer issues (.30); analyze same issues (.20)	.50
03/24/21	T Nifong	Draft reply to Dondero's objection to motion to compel preservation	1.30
03/24/21	MA Clemente	Participate in sanctions hearing (2.0); prepare for hearing (.7); assess further Dondero stay strategy (.6); call with D. Twomey regarding same (.3)	3.60
03/24/21	J Hoffman	Attend continued hearing on the contempt motion (2.0); draft supplemental declaration (0.8)	2.80
03/24/21	PP Reid	Participate (in part) in hearing on motion for contempt (1.5); participate in call with FTI regarding UCC call (.3)	1.80
03/24/21	A Russell	Attend and observe continued hearing re motion to find J. Dondero in contempt (2.0); review, analyze Dondero motion for leave to reopen evidence re contempt hearing (.4); correspond with Sidley team re same, updates re hearing (.3); correspond with Sidley and Pachulski re updated scheduling re hearings and deposition continuances (.2).	2.90
03/24/21	PH Montgomery	Attend hearing (in part) regarding motion to stay (1.2); call with FTI regarding outstanding issue (.3)	1.50
03/24/21	EA Bromagen	Attend hearing on motion to hold Dondero in contempt (2.0); emails with E. Cheng re related party notes litigation (.1)	2.10

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/25/21	R Fink	Review 3-22-21 hearing transcript	.10
03/25/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.30
03/25/21	CM Rognes	Update litigation outstanding task list (0.5); correspond with P. Montgomery re: scheduling order (0.2); review scheduling order (0.1); draft reply in support of preservation motion (0.9); review contempt transcript (0.3); draft oral argument re: preservation motion (1.7); research re: scheduling order (0.4); draft scheduling order (0.7); correspond with debtor's counsel re: stipulation (0.1); correspond with J. Hoffman re: scheduling order (0.1); correspond with T. Nifong re: reply in support of preservation motion (0.2)	5.20
03/25/21	T Nifong	Draft reply to Dondero's objection to motion to compel preservation	5.40
03/25/21	MA Clemente	Address scheduling emails with J. Morris (.2); review FTI notes analysis (.4)	.60
03/25/21	J Hoffman	Correspondence with clerk re: scheduling order in adversary (0.2); discuss strategy of same with C. Rognes (0.3); research re: same (0.5)	1.00
03/25/21	PH Montgomery	Communications with C. Rognes regarding PI issues	.20
03/25/21	EA Bromagen	Review detail of notes litigation summary and emails with M. Clemente and E. Cheng re same (.5); emails with P. Daugherty re hearing transcripts (.1)	.60
03/26/21	T Nifong	Draft reply to Dondero's objection to UCC motion to compel preservation	.30
03/26/21	CM Rognes	Draft scheduling order	.70
03/26/21	MA Clemente	Emails with E. Bromagen re: analysis of note claims (.3); review analysis of related party notes (.2); work on value of related notes relative to proposal (.6)	1.10
03/26/21	EA Bromagen	Review notes litigation summary and emails to M. Clemente re same	.30
03/28/21	MA Clemente	Update email with M. Kirschner (.1); continued analysis of timing of Kirschner retention (.4)	.50
03/29/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
03/29/21	T Nifong	Review hearing preparation materials for motion to compel preservation hearing	.70
03/29/21	CM Rognes	Hearing preparation re: motion to preserve (3.1); correspond with P. Montgomery re: scheduling order (0.1); revise scheduling order (0.2); attend weekly professionals call with	4.40

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		Sidley and FTI (0.8); correspond with P. Montgomery re: motion to preserve (0.1); correspond with P. Montgomery re: settlement (0.1)	
03/29/21	MA Clemente	Begin review of UBS filings (1.0); address issues on seal motion (.4); address CLOH request regarding settlement conference (.3)	1.70
03/29/21	A Russell	Review, analyze update re motion to seal UBS adversary complaint (.2); correspond with Sidley team re same (.2).	.40
03/29/21	PH Montgomery	Call (in part) with Sidley and FTI teams regarding UCC call and tasks	.70
03/29/21	PG Foley	Attend (in part) UCC professionals call regarding current case tasks	.20
03/30/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.30
03/30/21	CM Rognes	Draft hearing preparation for motion to preserve (1.4); draft chronology (1.5); update litigation task list (0.2); correspond with P. Montgomery re: scheduling order (0.2); correspond with P. Montgomery re: preservation motion and hearing preparation (0.2); correspond with counsel re: settlement (0.1); review adversary proceeding schedules (0.2)	3.80
03/30/21	PP Reid	Emails and telephone conference regarding hiring of litigation trustee (.5); emails regarding adversary proceedings (.2)	.70
03/30/21	J Hoffman	Draft notices of appearance and AP pleadings (1.3); confer with E. Bromagen re: same (0.3)	1.60
03/30/21	A Russell	Review, analyze sealed pleadings re UBS adversary	.80
03/30/21	PH Montgomery	Call with P. Reid and M. Clemente regarding case status	.50
03/30/21	PG Foley	Review of February invoice (3.1); related correspondence with D. Lutes regarding same (.1)	3.20
03/30/21	MA Clemente	Call with P. Reid and P. Montgomery re: litigation strategy (.7); analysis of timing of Kirschner retention (.8); address emails regarding seal motion (.5); brief review of TRO papers (.4); update email with M. Kirschner regarding same (.1); email with P. Montgomery and P. Reid re: common interest agreement (.2)	2.70
03/31/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.10
03/31/21	PP Reid	Participate in portion of telephone conference with FTI regarding UCC call	.20
03/31/21	MA Clemente	Read exhibits and related materials for UBS TRO (1.1); call with Dondero group re: appeal schedule (.5); call with J.	2.20

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		Pomerantz re: appeal schedule (.3); address issues regarding seal motion request (.3)	
03/31/21	PH Montgomery	Attend call (in part) with FTI regarding UCC meeting	.40
03/31/21	J Hoffman	Analysis of status of cases on appeal	.30
03/31/21	CM Rognes	Attend pre-UCC call with Sidley and FTI (0.5); revise reply in support of preservation motion (0.1); correspond with T. Nifong re: preservation motion hearing (0.4)	1.00
03/31/21	T Nifong	Confer with P. Montgomery re: motion to compel preservation hearing (.1); confer with C. Rognes re: same (.4)	.50
Task Subtotal			250.90
15 Plan and Disclosure Statement			
03/01/21	MA Clemente	Call with Pachulski and Nextpoint and funds re: schedule for stay (.4); call with J. Pomerantz re: appeals (.3); analysis of appeals strategy (.9); call with Pomerantz re: appeals (.3); conference with D. Twomey re: appeals (.4)	2.30
03/01/21	EA Bromagen	Call with M. Clemente re confirmation issues (.4); call with M. Kirschner re retention issues (.3); review of motion to stay confirmation and consideration of same (.9)	1.60
03/02/21	DM Twomey	Phone conference with M. Clemente regarding appeals update and issues	.30
03/02/21	MA Clemente	Group call with Winget objectors re: appeal process (.5); emails regarding appeal schedule (.3); assess appellate strategy (.7); call with D. Twomey regarding same (.3)	1.80
03/04/21	J Hoffman	Review, analyze appeal pleadings	.30
03/04/21	MA Clemente	Respond to emails with FTI and E. Bromagen re: latest D&O developments (.4); analysis of appeals and stay motions pending appeal (.8); emails with J. Pomerantz re: appellate schedule (.2); review CNA policy (.5); email with T. Cunningham re: CAN policy (.1)	2.00
03/04/21	EA Bromagen	Call with E. Cheng, M. Flaharty, T. Cunningham and G. Vicidomono re D&O insurance search status and next steps (.8) review of quote in preparation for same (.4); emails with M. Clemente re D&O insurance search status (.3) emails with Pachulski and FTI re insurance search status (.3)	1.80
03/05/21	MA Clemente	Assess materials and emails with T. Cunningham regarding D&O insurance (.2); call with J. Pomerantz re: Dondero proposal (.3); assess most recent Dondero proposal (.9); call with E. Bromagen re: D&O status (.3); review and assess updated information on D&O proposal and latest strategy (.6)	2.30
03/05/21	EA Bromagen	Call with M. Clemente re D&O insurance search status (.3);	.60

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		further review of D&O insurance quote materials (.3)	
03/08/21	R Fink	Research limitations issues for assigned claims	2.90
03/08/21	R Fink	Draft memo regarding limitations issues for assigned claims	1.00
03/08/21	R Fink	Confer with E. Bromagen regarding findings and further research on limitations issues (.3); draft email summary reports to E. Bromagen re same (.7)	1.00
03/08/21	A Russell	Correspond with Sidley team re research re tolling of statutes of limitations re estate claims (.2); correspond with E. Bromagen re objection to motions to stay confirmation order pending appeal (.1).	.30
03/08/21	MA Clemente	Analyze issues re: D&O insurance (.5); assess timing of effective date (.2)	.70
03/08/21	EA Bromagen	Call with M. Flaharty, E. Cheng, and Alliant re D&O issues (.5); review of policy re same (.4); discuss D&O issues with M. Flaharty (.3); discuss same with M. Clemente (.2); emails with Pachulski re D&O issues (.3); review of limitations issues and emails with R. Fink re same (.6); review of research and further emails with R. Fink re same (.1); conference with R. Fink re same (.3); review of case law re same (.4)	3.10
03/09/21	DM Twomey	Brief review of emails/presentation from debtor regarding Dondero purchase proposal	.20
03/09/21	MA Clemente	Analyze D&O correspondence (.4); evaluate Dondero proposal for related party notes (.4); call with E. Bromagen re: estate claims and limitations period (.3); review analysis of estate claims and limitations periods (.4); assess strategy re: timing of Kirschner retention (.3); analysis of open issues on D&O policies and solutions (.5); assess and review debtor analysis of recent Dondero proposal (.5)	2.80
03/09/21	R Fink	Research and revise memorandum on limitations issues for assigned claims (3.3); discuss issue with E. Bromagen re: same (.1)	3.40
03/09/21	EA Bromagen	Discuss assignment of claim issue with R. Fink (.1); review of research re same (.5); further review of same (.6); discuss same with M. Clemente (.3)	1.50
03/10/21	MA Clemente	Address effective date issues including D&O insurance and liquidity	.90
03/10/21	EA Bromagen	Review motions for stay and draft Committee objection to motions for stay	2.10
03/11/21	MA Clemente	Review Debtor response to stay motion (.5); review of joinder (.2)	.70

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/11/21	DM Twomey	Emails with team regarding objection to confirmation stay request and brief review of same	.30
03/11/21	EA Bromagen	Draft objection to stay motion (1.1); emails with team re same (.1); review emails with Pachulski team, FTI team, and Alliant re open D&O issues (.4)	1.60
03/12/21	MA Clemente	Review and revise joinder to stay objection (.4); email with A. Russell and E. Bromagen re: joinder (.1); review further draft of joinder (.3); analysis of issues to effective date and assess timing (.2); call with D. Twomey regarding same (.2)	1.20
03/12/21	DM Twomey	Emails with team, UCC regarding objection to stay motion (.20); emails with Pachulski, team re notice (.10); analysis of status update, effective date, strategy going forward (.10); call with M. Clemente regarding same (.20)	.60
03/12/21	EA Bromagen	Review of materials in advance of Board/UCC call (.2); review and revise draft of objection to motion for stay re comments, finalize same for filing (1.5); emails with Committee re same (.2); emails with J. Hoffman re filing of same (.2)	2.10
03/15/21	MA Clemente	Assess latest Dondero proposal (.7); email to DC Sauter re: proposal (.1); review schedule for various appeals (.2)	1.00
03/16/21	MA Clemente	Address various questions on D&O policy (.5); analysis of potential liquidity needs under the plan (.7); analysis of timing of Effective Date (.4)	1.60
03/16/21	A Russell	Review, analyze replies in support of motions to stay effectiveness of confirmation order pending appeal.	.60
03/16/21	EA Bromagen	Review of research on litigation trust issue (.6); emails with R. Fink re same (.2) further research regarding same (1.2)	2.00
03/17/21	DM Twomey	Phone conference with M. Clemente regarding status update, effectiveness timing issues, stay/bond issue (.30); analyze issues regarding stay proposal (.30); emails with M. Clemente regarding stay pending appeal (.20)	.80
03/17/21	MA Clemente	Address D&O policy email from E. Cheng (.2); call with J. Pomerantz re: stay pending appeal (.2); call with D. Twomey re: stay pending appeal (.3); email from J. Pomerantz re: stay (.1); analysis of issues regarding stay proposal by debtor (.5); strategy regarding debtor stay proposal (.5); email to Pachulski team re: D&O (.1); analysis of D&O insurance proposal (.3); assess outstanding D&O issues (.3); issues regarding potential effective date (.5); assess liquidity need for effective date (.4)	3.40
03/17/21	A Russell	Review status of confirmation order appeal (.2); review, analyze Debtor's settlement proposal re motions to stay effectiveness of confirmation order (.2); correspond with M. Clemente re same (.3).	.70

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
03/18/21	MA Clemente	Analysis of open issues for D&O policy (.5); review emails from M. Flaharty at FTI re: policy (.2); assess issues for effective date (.5)	1.20
03/18/21	EA Bromagen	Review of stay motion pleadings	.60
03/19/21	R Fink	Confer with E. Bromagen regarding bond payment/motion to stay pending appeal research	.10
03/19/21	R Fink	Research case law regarding bond payments and motions to stay pending appeal (3.3); email to E. Bromagen re: same (.2)	3.50
03/19/21	DM Twomey	Emails with team regarding stay hearing update (.20); call with M. Clemente regarding same, stay, bond and other issues (.30); analyze materials for same (.30); conference call with team regarding stay, bond, related issues and next steps (.80); follow up emails with team regarding same (.20)	1.80
03/19/21	MA Clemente	Participate in D&O call with company, FTI and Alliant (1.0); team call regarding strategy on stay motion (.9); call with E. Bromagen re: research and related issues regarding bond and stay (.4); analysis of stay issues and strategy for further hearing (.5); call with D. Twomey regarding same (.3); call with J. Pomerantz re: stay strategy (.3); preliminary review of stay research (.5)	3.90
03/19/21	EA Bromagen	Attend hearing on stay motions (2.9); call with Sidley team re next steps re stay motion supplemental briefing (.8); call with M. Clemente re stay motion next steps (.4); research re stay motions bond posting (1.3); discussions and emails with R. Fink re same (.2); emails with M. Clemente re same (.2)	5.80
03/20/21	R Fink	Research case law regarding bond payments and motions to stay pending appeal (.8); draft memo regarding same (.9); draft email to E. Bromagen regarding same (.1)	1.80
03/21/21	R Fink	Review and respond to email from E. Bromagen on draft on pleading regarding stay hearing	.10
03/21/21	R Fink	Research bankruptcy rules and applicable case law regarding stay proceedings	.20
03/21/21	R Fink	Draft supplemental pleading to Committee objection of the stay motions	2.20
03/21/21	MA Clemente	Email with E. Bromagen re: stay response (.2); read cases regarding entitlement to a stay (.7); strategy regarding stay response (.5)	1.40
03/21/21	EA Bromagen	Research related to stay motion supplemental briefing (2.4); emails with R. Fink and M. Clemente re same (.3); emails with G. Demo re same (.2)	2.90
03/22/21	DM Twomey	Review materials from precedent case regarding confirmation	1.90

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		order appeal and bond issues (1.20); emails with team regarding same precedent materials (.20); brief review and comment on supplement objection regarding stay/bond (.30); emails with team regarding same, bond calculation issues (.20)	
03/22/21	MA Clemente	Read cases regarding stay (1.3); revisions to stay papers (1.3); call with Pachulski team re: stay strategy (.6)	3.20
03/22/21	A Russell	Telephone conference with Sidley and Pachulski teams re strategy re supplemental statements re motions to stay confirmation order (.4); review, analyze research re same (.6); correspond with Sidley team re same (.5).	1.50
03/22/21	R Fink	Draft supplemental pleading to Committee objection of the stay motions (1.4); review transcript of hearing held 3/19/21 regarding size of bond for stay motions (.1); research case law regarding appropriate size of bond in stays pending appeal of plan confirmation (1.0); draft email to E. Bromagen and A. Russell regarding calculations for bond amounts in stays pending appeal (.1); review Delaware precedent regarding posting of a bond for stay pending appeal of confirmation order (.2); revise supplemental pleading to Committee's objection to motion for stay (2.3); correspond with Sidley team and Debtors' counsel regarding supplemental responses to stay pending appeal (.4); review emails from M. Clemente, A. Russell, D. Twomey, and E. Bromagen regarding supplemental opposition to stay pending appeal (.2)	5.70
03/22/21	EA Bromagen	Review and revise supplemental objection to stay motion (.7); emails with M. Clemente and Pachulski team re same (.2); further emails with Sidley team re same (.4); call with Sidley and Pachulski team regarding strategy for supplemental briefing on stay motion (.6)	1.90
03/23/21	DM Twomey	Brief review and comment on objection supplement regarding stay/bond (.30); emails with team regarding bond amount issues (.30); phone conferences with M. Clemente regarding upcoming hearing, stay/bond issues, related strategy (.40); analyze stay/bond issues (.40); review revised objection supplement (.20)	1.60
03/23/21	MA Clemente	Work on stay objection (1.6); call with D. Twomey re: stay strategy (.4); further revisions to stay objection (.9); email with Sidley team re: stay objection and issues (.2); read cases (.8); call with J. Pomerantz re: stay issues (.3); read letter from Dondero entities (.2); address emails with court clerk re: hearing (.3); final revisions to stay objection (.7); call with E. Bromagen re: stay objection (.3)	5.70
03/23/21	A Russell	Review, analyze and comment on Committee's supplemental statement re motions to stay confirmation order pending appeal (.8); correspond with Sidley team re same (.5); review, analyze	1.70

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		other statements filed (.4).	
03/23/21	R Fink	Revise supplement to committee objection to motion for stay (1.2); review A. Russell edits to supplementary motion opposing stay pending appeal (.2); review emails from Sidley team and PSZJ regarding supplemental response and hearing on motion for stay pending appeal (.3); draft email to J. Hoffman and E. Bromagen re: filing of Committee's supplemental objection to stay pending appeal (.1)	1.80
03/23/21	EA Bromagen	Review and revise supplemental stay motion filing in response to multiple comments (2.9); emails with Sidley team re same (.4); discuss same with M. Clemente (.3); emails with J. Hoffman re filing same (.1); emails with R. Fink re revisions to same (.2); review of trust documents and email to Committee re designations on Oversight Board (.5)	4.40
03/25/21	MA Clemente	Strategy regarding timing of effective date and Kirschner retention (.5); analysis of Dondero stay options in district court (.6)	1.10
03/26/21	MA Clemente	Review emails regarding D&O questions/outstanding items (.3); call with DC Sauter re: proposal (.4); assess proposal (.2); strategy regarding proposal (.4); analysis of Effective Date timing (.3)	1.60
03/29/21	MA Clemente	Revised proposal from DC Sauter (.1); emails with FTI re: revised proposal (.3); analysis of revised proposal (.3); determine next steps with revised proposal (.4); analysis of proposed financing structure (.6)	1.70
03/30/21	MA Clemente	Assess latest Dondero proposal (.4); address issues regarding treatment of related party notes (.7)	1.10
03/30/21	EA Bromagen	Review of proposed purchase of assets	.40
03/31/21	EA Bromagen	Review of analysis of proposed asset purchase comparison to plan	.30
Task Subtotal			110.60
21 Tax			
03/01/21	ST Advani	Follow-up on e-mail request from FTI regarding Hunton status	.20
03/01/21	EA Bromagen	Emails with G. Demo and S. Advani re claims for tax distributions	.10
03/16/21	ST Advani	Review materials on status of IRS audit	.10
03/22/21	ST Advani	Review proof of claim for tax refund bonus	.20
Task Subtotal			.60

SIDLEY AUSTIN LLP

Invoice Number: 41019206
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
24 Creditor Communications			
03/01/21	MA Clemente	Call with M. Hankin re: appeals (.3); further call with M. Hankin re: appeals (.3)	.60
03/05/21	MA Clemente	Email to Committee re: Dondero proposal	.20
03/09/21	MA Clemente	Email from J. Moldovan regarding inquiry	.10
03/10/21	MA Clemente	Call with J. Terry re: various issues	.30
03/15/21	MA Clemente	Detailed email with Committee regarding case issues	.50
03/18/21	MA Clemente	Emails with M. Hankin re: claims purchases	.30
03/19/21	MA Clemente	Call with J. Terry re: various issues	.30
03/23/21	MA Clemente	Call with J. Terry re: various issues (.4); email with M. Hankin re: hearing (.1); call with J. Terry re: follow up on issues (.3)	.80
03/24/21	MA Clemente	Call with J. Terry re: various issues	.40
03/25/21	MA Clemente	Call with P. Daugherty re: various issues (.4); analysis of information from P. Daugherty (.5)	.90
03/26/21	EA Bromagen	Discuss creditor plan inquiries with E. Cheng and D. O'Brien (.3) emails with E. Cheng and D. O'Brien re same (.1)	.40
03/29/21	MA Clemente	Call with A. Clubok re: various issues (.3); email with A. Clubok re: various issues (.1)	.40
03/30/21	MA Clemente	Call with M. Hankin re: timing issues (.4); call with A. Clubok re: various issues (.3)	.70
03/31/21	MA Clemente	Call with A. Clubok re: UBS TRO (.3); call with M. Hankin re: timing issues (.2); call with J. Terry re: various issues (.4)	.90
Task Subtotal			<u>6.80</u>
Total Hours for all Tasks			557.90

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

T A S K D E T A I L

Date	Name	Narrative	Hours
05 Committee Meetings			
04/07/21	T Nifong	Participate in weekly UCC call regarding case issues	.50
04/07/21	R Fink	Participate in and take minutes on weekly UCC call (.5); revise and synthesize same (.2)	.70
04/07/21	J Hoffman	Attend weekly telephonic committee meeting	.50
04/07/21	MA Clemente	Participate in weekly committee meeting (.5); evaluate next steps from same (.2)	.70
04/07/21	PP Reid	Participate in weekly UCC call regarding case issues	.50
04/07/21	PH Montgomery	Attend weekly UCC meeting regarding various case issues	.50
04/07/21	A Russell	Attend weekly Committee meeting regarding case issues	.50
04/07/21	EA Bromagen	Call with Committee and advisors re various issues	.50
04/14/21	R Fink	Participate in and take minutes on weekly UCC call (.7); revise and synthesize minutes re- same (.3)	1.00
04/14/21	MA Clemente	Participate in committee meeting (.7); review materials and next steps regarding same (.1)	.80
04/14/21	A Russell	Attend weekly Committee meeting regarding various case issues	.70
04/14/21	T Nifong	Participate in weekly UCC call regarding case issues and updates	.70
04/14/21	EA Bromagen	Call with Committee and advisors re various issues	.70
04/14/21	PH Montgomery	Attend weekly UCC meeting regarding various issues	.70
04/14/21	CM Rognes	Attend weekly UCC call regarding various issues	.70
04/15/21	MA Clemente	Work to resolve issues re: ACIS resignation from UCC	1.00
04/28/21	R Fink	Participate in and take minutes on weekly UCC call regarding various issues	.50
04/28/21	T Nifong	Participate in weekly UCC call regarding various case issues	.50
04/28/21	EA Bromagen	Email to Committee re agenda for meeting (.1); attend weekly meeting with Committee and advisors regarding various case issues (.5)	.60
04/28/21	CM Rognes	Attend weekly UCC call regarding various case issues	.50
04/28/21	MA Clemente	Participate in weekly committee meeting regarding various case issues	.50

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/28/21	J Hoffman	Participate on weekly committee call regarding various issues	.50
04/28/21	A Russell	Attend weekly Committee meeting regarding various case issues	.50
Task Subtotal			14.30
06 Business Operations			
04/13/21	A Russell	Review, analyze financing update.	.30
04/29/21	MA Clemente	Call with J. Seery re: various issues	.90
04/29/21	J Hoffman	Review, analyze CEO Bonus motion	.20
Task Subtotal			1.40
07 Case Administration			
04/01/21	J Hoffman	Correspondence with committee members re: hearing and deposition records	.30
04/01/21	MA Clemente	Email with E. Bromagen re: committee meeting	.10
04/01/21	EA Bromagen	Discuss various issues with G. Demo	.10
04/03/21	J Hoffman	Prepare materials for P. Montgomery for preservation hearing	.50
04/05/21	DJ Lutes	Review case docket for recent filings and deadlines (.2); prepare electronic files for Sidley team regarding same (.3)	.50
04/05/21	DM Twomey	Correspond with M. Clemente regarding hearing update, steps to effectiveness, related issues (.30); review emails with FTI/Sidley regarding key issues, hearing preparation (.20)	.50
04/05/21	MA Clemente	Email regarding agenda for team call with FTI (.1); address issues for upcoming board call (.1); team call with FTI re: various issues (.4)	.60
04/05/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.30
04/05/21	EA Bromagen	Weekly call (in part) with FTI and Sidley re various issues	.30
04/06/21	DJ Lutes	Emails with T. Nifong regarding case administration issues (.1); review materials regarding same (.1); prepare electronic materials regarding same (.1)	.30
04/06/21	J Hoffman	Finalize and file notices of appearance	1.00
04/06/21	MA Clemente	Call with E. Bromagen re: various issues	.40
04/06/21	EA Bromagen	Call with M. Clemente re various issues (.4); emails with Sidley and FTI teams re agenda for meeting (.2); prepare materials for same (.2)	.80
04/07/21	R Fink	Prepare for weekly UCC meeting and review relevant emails	.10

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		with Sidley and FTI teams regarding same	
04/07/21	J Hoffman	Draft and file notice of appearance (0.3); correspondence with N. Cade re: district court notices (0.3)	.60
04/07/21	MA Clemente	Revisions to email re: related party notes and control (.3); team call with FTI re: various issues (.3); prepare for committee call (1.0)	1.60
04/07/21	A Russell	Telephone conference with Sidley and FTI teams to prepare and coordinate for Committee meeting.	.30
04/07/21	EA Bromagen	Call with FTI and Sidley teams re various issues (.3); emails with M. Clemente and Committee re agenda for Committee meeting, draft of same (.3)	.60
04/08/21	J Hoffman	Revise and finalize supplemental declaration	.30
04/08/21	J Hoffman	Research district court local rules for appeals	.40
04/09/21	DJ Lutes	Review docket materials, correspondence and pleadings for status and deadlines (.2); prepare electronic files for Sidley team regarding same (.1)	.30
04/09/21	MA Clemente	Call with E. Bromagen re: various issues	.40
04/12/21	J Hoffman	Multiple calls, emails with N. Cade regarding Fifth Circuit (0.6); finalize response for filing (0.2); research regarding Fifth Circuit filings (0.5)	1.30
04/12/21	A Russell	Telephone conference with Sidley and FTI teams (in part) re current case issues.	.40
04/12/21	MA Clemente	Team call with FTI re: various issues (.5); prepare for team call (.4)	.90
04/13/21	DR Carpenter	Research regarding filing of Response to Petition for Review, and potential motion to intervene in appeal (.8); advice to Sidley team regarding same (.3)	1.10
04/13/21	J Hoffman	Correspondence with N. Cade regarding district court filings	.30
04/13/21	J Hoffman	Multiple calls to the court regarding entry of appearances	.20
04/13/21	EA Bromagen	Emails and calls with J. Hoffman and litigation team re filing of Committee response to direct appeal with Fifth Circuit (.2); emails with M. Clemente re same (.1); discuss various issues with M. Clemente (.3)	.60
04/14/21	MA Clemente	Team call with FTI re: various issues (.4); prepare for committee meeting (1.0)	1.40
04/14/21	A Russell	Telephone conference with Sidley and FTI teams to prepare and coordinate for Committee meeting.	.40
04/14/21	J Hoffman	Research regarding appearance requirements for Fifth Circuit	.20

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		appeal	
04/14/21	EA Bromagen	Correspond with M. Clemente regarding various issues (.3); call with FTI and Sidley re various issues in advance of Committee call (.4)	.70
04/15/21	A Russell	Review, analyze Acis letter of resignation from Committee (.1); correspond with Sidley team re issues and next steps re same (.4).	.50
04/15/21	DM Twomey	Analyze emails/letter regarding Acis resignation from UCC (.20); review/assess email from UST regarding same (.20)	.40
04/15/21	J Hoffman	Work with N. Cade on filing logistics (0.3); review filings (0.3)	.60
04/15/21	EA Bromagen	Calls with M. Clemente re various issues (.4); emails with IT re email distribution list and review of same (.1); review Committee bylaws re member resignation (.2)	.70
04/16/21	A Russell	Correspond with Sidley team re strategy and potential issues re replacement of Acis.	.30
04/16/21	DJ Lutes	Correspond with J. Hoffman regarding case issues (.2); review case materials and status updates for same (.4); prepare electronic files and calendar for same (.1)	.70
04/16/21	MA Clemente	Call with J. Seery re: various issues (.5); call with J. Pomerantz re: various issues (.4); emails with J. Hoffman re: various issues (.2)	1.10
04/16/21	J Hoffman	Draft email to M. Clemente regarding case issues (0.3); finalize Committee Response in preparation of filing (0.2); correspondence with Debtor counsel regarding filing logistics (0.1); multiple calls, emails with N. Cade regarding appeal documents (0.4); review pleadings filed in Fifth Circuit appeal (0.2)	1.20
04/19/21	DJ Lutes	Prepare electronic files regarding case administration for Sidley team (.2); review materials for same (.1); emails with Sidley team regarding same (.2)	.50
04/19/21	DM Twomey	Emails with FTI/Sidley regarding weekly agenda, claims purchase information/issues	.20
04/19/21	EA Bromagen	Call with Sidley and FTI teams re various issues	.80
04/19/21	J Hoffman	Discuss case issues with M. Clemente (0.4); finalize and file notices of appearance (0.8); correspondence with N. Cade regarding district court appearance requirements (0.4); finalize and file fee applications (0.2); update Sidley team regarding case deadlines and related issues (0.3); general case management (1.0)	3.10
04/19/21	MA Clemente	Call with FTI team re: various issues (.8); review Kirschner	1.00

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		email (.2)	
04/19/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.80
04/20/21	DJ Lutes	Review draft motions from Debtor's counsel for case developments and proposed hearing status	.30
04/20/21	EA Bromagen	Discuss various issues with G. Demo (.4); discuss various case issues with M. Clemente (.5)	.90
04/20/21	MA Clemente	Emails with the Court re: scheduling	.30
04/20/21	J Hoffman	Update case calendar	.20
04/20/21	A Russell	Review updates from Court re litigation scheduling matters.	.20
04/21/21	DJ Lutes	Review case docket for recent filings and downloads (.2); review critical update items and hearing agendas (.2); prepare electronic files for same (.1)	.50
04/21/21	EA Bromagen	Emails with R. Fink and M. Clemente re case calendar, review of same	.30
04/21/21	DM Twomey	Review case update from M. Clemente (.20); review emails/materials regarding exit financing (.20)	.40
04/21/21	J Hoffman	Update case calendar (0.2); correspondence with A. Russell re: same (0.1); correspondence with M. Clemente re: general case matters (0.3); prepare pro hac vice applications for appeals cases (0.8)	1.40
04/21/21	A Russell	Review, analyze case update for Committee.	.20
04/22/21	J Hoffman	Correspondence with clerk re: fee app hearings (0.4); update case calendar (0.3)	.70
04/22/21	MA Clemente	Call with J. Pomerantz re: various issues	.30
04/23/21	DJ Lutes	Review docket and motions for updates, status and deadlines (.2); prepare electronic files for same (.1)	.30
04/23/21	J Hoffman	Correspondence with clerk re: fee applications (0.1); confer with Sidley team re: general case matters (0.3); update case calendar (0.3); review, analyze new filed pleadings (0.5)	1.20
04/26/21	DM Twomey	Phone call with M. Clemente re exit financing, insurance and other case issues (.40); emails with Sidley and FTI teams re same (.20)	.60
04/26/21	EA Bromagen	Weekly call with Sidley and FTI teams re various issues (.6); call with M. Clemente re various issues (.3)	.90
04/26/21	MA Clemente	Team call with FTI re: various issues (.6); call with J. Seery re: various issues (.4); call with D. Twomey re: various issues (.4)	1.40

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/26/21	J Hoffman	Draft CNOs for fee apps (0.8); finalize, file NOH (0.3); analyze new filed pleadings (0.5)	1.60
04/26/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.60
04/27/21	MA Clemente	Call with E. Bromagen re: various issues (.4); work on issues and agenda for committee call (.4); call with D. Twomey re: various issues (.4)	1.20
04/28/21	R Fink	Prepare for and review relevant documents regarding weekly UCC call	.10
04/28/21	DJ Lutes	Review docket for deadlines, status and scheduling including preparation of electronic files for same	.30
04/28/21	DM Twomey	Phone call with M. Clemente re litigation, D&O insurance, plan effectiveness and other case issues (.50); analyze same issues and review team emails re same (.50)	1.00
04/28/21	MA Clemente	Prepare for committee meeting (.4); call with D. Twomey regarding multiple case issues and prep for meeting (.5)	.90
04/29/21	EA Bromagen	Review of motion to compel compliance with Rule 2015	.10
04/29/21	DM Twomey	Correspond with M. Clemente re notes litigation and insurance issues/strategy (.30); review emails re same, UCC meeting, compensation and other case issues (.40)	.70
04/30/21	DJ Lutes	Review docket, calendar and deadlines for Sidley team	.20
04/30/21	J Hoffman	Correspondence with Sidley team re: depositions (0.2); correspondence with Sidley team re: motion for preliminary injunction (0.2)	.40
04/30/21	A Russell	Review, analyze Redeemer Committee's notice of resignation from UCC.	.10
04/30/21	MA Clemente	Call with E. Bromagen re: various issues (.5); emails with FTI and A. Bromagen and A. Russell re: resignation (.2); review claim transfer filings (.4)	1.10
04/30/21	EA Bromagen	Emails with IT regarding email distribution listing and review of same	.20
Task Subtotal			48.30
08 Claims Administration and Objections			
04/15/21	A Russell	Review, analyze motion and related filings re settlement of UBS claims.	.60
04/16/21	A Russell	Review, analyze Acis claim transfers.	.30
04/20/21	A Russell	Review, analyze responses to Debtor's omnibus objection to employee claims.	.40

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/22/21	EA Bromagen	Review of Debtor Siepe settlement (.2); emails with E. Cheng and M. Clemente, Committee re same (.4)	.60
04/22/21	MA Clemente	Evaluate claim transfer issues	.70
04/22/21	A Russell	Review, analyze 9019 settlement motion re notes and correspond with Sidley team re same.	.40
04/23/21	EA Bromagen	Emails with Pachulski and Committee members re Siepe settlement motion	.30
04/23/21	MA Clemente	Address Siepe settlement issues with E. Bromagen	.30
04/30/21	A Russell	Review, analyze notices of claim transfers re Redeemer Committee and Harbourvest claims.	.30
Task Subtotal			3.90
09 Corporate Governance and Board Matters			
04/05/21	TD Cunningham	Receipt and review of quote for full excess Side A cover	.40
04/06/21	R Fink	Participate in and take minutes on Director/UCC Call (.6); revise and synthesize notes re same (.3)	.90
04/06/21	MA Clemente	Call with board re: various issues	.60
04/06/21	PP Reid	Participate in Board call (in part) and discussion regarding cash flow	.50
04/06/21	A Russell	Telephone conference with Sidley, FTI, Pachulski, DSI, Committee and Independent Directors re weekly Board update for Committee.	.60
04/06/21	TD Cunningham	Review prior acts endorsement on proposed Side A coverage and email exchange with CNA re: same	.20
04/06/21	EA Bromagen	Call with Board and Committee regarding cash flow	.60
04/14/21	TD Cunningham	Review email exchange re: terms of proposed D&O policy from CNA	.20
04/16/21	R Fink	Participate in and take minutes on HCM UCC/Director call regarding case updates and plan effectiveness (1.1); revise and synthesize minutes re- same (.2)	1.30
04/16/21	A Russell	Telephone conference with Sidley, FTI, DSI, Pachulski, Committee and Independent Directors re weekly Board update.	1.10
04/16/21	MA Clemente	Committee call with the Board regarding case updates and plan effectiveness	1.10
04/16/21	EA Bromagen	Call with Committee and Board re plan effectiveness	1.10
04/20/21	TD Cunningham	Revise draft responses to I. Nasatir re: CNA policy provisions (.3); email exchanges with M. Flaharty and E. Cheng re: revisions to draft responses to I. Nasatir CNA policy provisions	1.30

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		(.2); review draft response to I. Nasatir questions and corresponding CNA policy language supporting same (.8)	
04/26/21	R Fink	Participate in and take minutes on HCM UCC/Director call regarding case issues (.5); revise and synthesize minutes re-same (.1)	.60
04/26/21	MA Clemente	Call with the Committee and the Board regarding case issues	.50
04/26/21	A Russell	Attend weekly Board/UCC meeting regarding case issues	.50
04/26/21	PH Montgomery	Attend UCC/board meeting regarding effective date issues	.50
04/27/21	TD Cunningham	Prepare for and participate in telephone conference with FTI and Sidley on CNA quotation and next steps	.50
Task Subtotal			12.50
11 Retention			
04/01/21	DJ Lutes	Review exhibits to supplemental declaration for accuracy and completeness	.90
04/02/21	MA Clemente	Address Kirschner retention timing issues	.50
04/12/21	DJ Lutes	Review materials and docket regarding connection and retention issues	.30
04/13/21	DJ Lutes	Email to J. Hoffman regarding supplemental declaration	.10
04/13/21	A Russell	Correspond with Sidley team re next steps for Kirschner's professional retention prior to effective date.	.30
04/19/21	EA Bromagen	Review draft Teneo engagement letter	.40
04/19/21	MA Clemente	Review updated declaration	.30
04/20/21	A Russell	Review, analyze Teneo engagement letter and correspondence re same.	.20
04/22/21	MA Clemente	Review supplemental Sidley declaration (.4); emails with J. Hoffman re: same (.2)	.60
04/22/21	J Hoffman	Revise supplemental declaration (0.5); finalize declaration exhibits for filing (0.8)	1.30
04/27/21	MA Clemente	Revisions to Kirschner engagement letter (.8) email with E. Bromagen re: same (.1)	.90
04/28/21	EA Bromagen	Revise Teneo engagement letter	.40
04/29/21	EA Bromagen	Revise Teneo engagement letter (.5); emails with Latham team re same (.1); emails with M. Kirschner re same (.1); consider issues re revisions to engagement letter (.2)	.90
04/29/21	MA Clemente	Address questions regarding Kirchner retention terms	.40

SIDLEY AUSTIN LLP

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/30/21	EA Bromagen	Discuss Teneo retention and other issues with M. Clemente	.50
Task Subtotal			8.00
12 Fee Applications			
04/01/21	DJ Lutes	Emails with J. Hoffman regarding monthly fee application (.2); prepare interim and monthly fee application materials and exhibits (.7)	.90
04/01/21	J Hoffman	Review fee applications (0.8); revise, finalize fee applications (0.4); correspondence with Committee re: same (0.2)	1.40
04/01/21	MA Clemente	Review Sidley fee application	.50
04/05/21	DJ Lutes	Prepare 5th interim fee application and exhibits (.8); prepare spreadsheets for same (.8); emails with A. Herbstman regarding blended rates (.1); prepare monthly fee application materials and exhibits (.4)	3.20
04/05/21	J Hoffman	Finalize, file fee applications	.30
04/06/21	DJ Lutes	Prepare interim fee application materials and exhibits (1.7); prepare monthly fee application exhibits (1.6); prepare electronic files regarding same (.3)	3.60
04/06/21	J Hoffman	Advise FTI team of interim fee application requirements	.30
04/07/21	DJ Lutes	Prepare monthly fee application materials and exhibits (1.8); prepare 5th interim fee application exhibits (1.4)	3.20
04/08/21	DJ Lutes	Prepare monthly fee application materials and exhibits (2.2); prepare 5th interim fee application (.4)	2.60
04/12/21	DJ Lutes	Prepare monthly fee application exhibits and materials (2.1); prepare interim fee application exhibits (.3)	2.40
04/12/21	J Hoffman	Research regarding interim fee application procedures (0.3); correspondence with FTI team regarding same (0.1)	.40
04/13/21	DJ Lutes	Prepare monthly fee application materials and exhibits (1.3); prepare interim fee application materials and exhibits (.8); emails with J. Hoffman regarding interim fee application (.1); emails with E. Bromagen regarding monthly fee application (.1); emails with S. Caputo regarding same (.1)	2.40
04/13/21	J Hoffman	Correspondence with D. Lutes re: fifth interim fee application	.10
04/16/21	DJ Lutes	Prepare monthly fee application for March (1.9); prepare 5th interim fee application (.6); call with J. Hoffman regarding same (.2)	2.70
04/16/21	J Hoffman	Call with D. Lutes regarding Highland fee applications (0.2); correspondence with Sidley team regarding same (0.2); correspondence with M. Clemente regarding logistics for fee	.60

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		applications (0.2)	
04/19/21	DJ Lutes	Prepare March monthly fee application materials and exhibits (2.3); prepare 5th interim fee application materials and exhibits (.6); emails with J. Hoffman regarding same (.2); emails with S. Caputo regarding monthly fee application (.2); review costs for March and April (.3)	3.60
04/19/21	EA Bromagen	Review of Sidley interim fee application and email to J. Hoffman re same	.20
04/19/21	J Hoffman	Review, revise Sidley interim fee application (1.2); review, revise FTI interim fee application (1.0); correspondence with FTI Team regarding fee applications (0.3)	2.50
04/19/21	MA Clemente	Emails with J. Hoffman re: interim fee applications	.20
04/20/21	J Hoffman	Correspondence with E. Cheng re: fee application hearings	.20
04/21/21	DJ Lutes	Emails with J. Hoffman regarding monthly and interim fee application issues (.2); review materials for same (.2); emails with S. Caputo regarding same (.2); prepare electronic files regarding same (.3)	.90
04/21/21	MA Clemente	Review 5th interim fee application (.5); emails with J. Hoffman re: interim application (.2)	.70
04/21/21	J Hoffman	Revise fee application (0.5); finalize and file same (0.2)	.70
04/21/21	J Hoffman	Correspondence with D. Lutes re: fee applications	.20
04/22/21	DJ Lutes	Prepare March monthly fee application materials and exhibits	.90
04/23/21	DJ Lutes	Emails with K. Rust regarding electronic billing materials for 5th interim period (.1); prepare materials for same (.3); prepare March and April monthly fee application materials and exhibits (2.2)	2.60
04/26/21	DJ Lutes	Prepare March and April monthly fee application materials and exhibits (3.1); emails with S. Caputo regarding same (.1); email with D. Peralta regarding April fee application (.1)	3.30
04/26/21	J Hoffman	Correspondence with FTI team re: interim fee apps (0.1); draft NOH for fee apps (0.5)	.60
04/27/21	DJ Lutes	Prepare March and April monthly fee application materials (.6); emails to E. Bromagen regarding same (.1); emails to M. Clemente regarding same (.1)	.80
04/28/21	J Hoffman	Review, revise FTI fee application (0.6); correspondence with Committee re: same (0.1)	.70
04/29/21	DJ Lutes	Prepare March and April monthly fee application exhibits and materials	1.90
04/30/21	DJ Lutes	Prepare monthly fee application materials and exhibits for	2.60

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		March and April (2.2); emails with J. Hoffman regarding same (.1); emails to S. Caputo regarding same (.2); email to P. Foley regarding privilege review (.1)	
04/30/21	J Hoffman	Finalize and file FTI fee application (0.3); correspondence with D. Lutes re: fee applications (0.1)	.40
04/30/21	MA Clemente	Review Sidley fee application	.50
Task Subtotal			48.10
13 Financing and Cash Collateral			
04/16/21	DM Twomey	Phone conference with M. Clemente regarding exit financing issues, Board call update (.30); analyze same exit financing issues (.40)	.70
04/16/21	MA Clemente	Call with J. Pomerantz re: financing (.3); call with D. Twomey re: financing motion (.3)	.60
04/20/21	R Fink	Review Debtor's motion regarding exit financing	.20
04/20/21	EA Bromagen	Review Debtor motion for financing (.4); emails with G. Demo and A. Artwala re same (.2); emails with Committee re same (.1)	.70
04/20/21	MA Clemente	Email with Sidley team re: exit financing (.1); email to E. Bromagen re: exit financing (.1); email to P. Montgomery re: exit financing (.1); brief review of exit financing papers (.3); call with E. Bromagen re: exit financing (.3); review Latham comments to exit financing (.3); further review of exit financing papers (.9); assess timing for exit financing (.8); further analysis of Oversight Board structure (.7)	3.60
04/20/21	J Hoffman	Analyze exit financing motion (0.4); draft analysis for litigation team re: same (0.3)	.70
04/20/21	A Russell	Review, analyze motion re exit financing and correspondence regarding same.	.30
Task Subtotal			6.80
14 Litigation			
04/01/21	CM Rognes	Correspond with P. Montgomery re: preservation motion hearing	.10
04/01/21	PH Montgomery	Correspond with C. Rognes regarding hearing preparation (.1); review materials for same (.2)	.30
04/01/21	MA Clemente	Review revised TRO order and related email (.2); address emails regarding briefing schedule for District Court proceedings (.4); assess UBS pleadings for impact on litigation strategy (1.1)	1.70

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/01/21	A Russell	Correspond internally re deposition transcripts (.2); review, analyze Debtor's response to UBS motion to file adversary complaint under seal (.3).	.50
04/02/21	T Nifong	Draft UCC reply to Dondero's objection to motion to preserve	.60
04/02/21	T Nifong	Draft witness list for UCC motion to preserve hearing	2.60
04/02/21	T Nifong	Confer with P. Montgomery re: reply to Dondero's objection to motion to compel preservation	.20
04/02/21	T Nifong	Call with opposing counsel and P. Montgomery re: UCC motion to preserve hearing	.50
04/02/21	T Nifong	Call with P. Montgomery re: UCC motion to preserve hearing	.40
04/02/21	NP Cade	Correspond with T. Nifong cite check (.1); cite check and blue book UCC reply to response for motion for order to preserve (.8); prepare for and efile same (.4)	1.30
04/02/21	J Hoffman	Draft additional NOAs (0.5); revise NOAs (0.2); review Dondero witness and exhibit list (0.2); assist with preparation of witness, exhibit list for preservation hearing (0.6); multiple calls, correspondence with T. Nifong to discuss W&E requirements (0.5); finalize, file W&E list (0.4)	2.40
04/02/21	PP Reid	Review Dondero pleadings for hearing on preservation (1.2); emails and telephone conferences with Sidley team regarding same (.4); draft and revise exhibit/witness list (.6); emails and telephone conferences with Sidley team regarding same (.2)	2.40
04/02/21	PH Montgomery	Call regarding hearing meet and confer with opposing counsel (.5); calls with T. Nifong regarding exhibit/witness list and related correspondence (.6); review and revise witness and exhibit list and coordinate filing (1.2); review and revise reply brief (1.5)	3.80
04/02/21	MA Clemente	Read exhibits for preservation hearing (.6); emails with P. Montgomery re: strategy (.3); work on strategy for preservation hearing (2.0); analysis of strategy regarding related party notes (.8); read Dondero reply (.6)	4.30
04/02/21	A Russell	Review, analyze Dondero response re Committee's preservation motion.	.40
04/03/21	T Nifong	Prepare for UCC motion to preserve hearing	.90
04/03/21	T Nifong	Review Dondero's proposed order for motion to compel Preservation	.50
04/03/21	T Nifong	Confer with N. George re: cross examination questions for Danly	.30
04/03/21	T Nifong	Confer with J. Hoffman re: preparing for UCC motion to	.10

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		preserve hearing	
04/03/21	T Nifong	Call with M. Abdul Jabbar re: UCC motion to preserve hearing	.50
04/03/21	T Nifong	Prepare objections to Dondero's exhibit list	1.10
04/03/21	T Nifong	Prepare cross examination questions for Dondero	5.30
04/03/21	SV Franks	Research timing requirements for filing exhibit and witness lists prior to a hearing	.50
04/03/21	J Hoffman	Call with T. Nifong to discuss research for cross-examination (0.1); multiple emails with P. Montgomery, T. Nifong re: same (0.5); draft portions of cross-examination outline (1.2); review, revise cross-examination outline (0.7); research re: arguments for preservation hearing (1.1)	3.60
04/03/21	N George	Attend telephone conference with M. Abdul-Jabbar regarding matter background (.7); research regarding filings (1.5); attend telephone conference with T. Nifong regarding matter background (.3); review exhibits in preparation of upcoming hearing (.8); draft Danley cross-examination outline (1.1)	4.40
04/03/21	M Abdul-Jabbar	Confer with T. Nifong relating to hearing on motion to compel preservation (.5); prepare draft materials for P. Montgomery in connection with upcoming hearing (.2)	.70
04/03/21	M Abdul-Jabbar	Analyze exhibits and witness materials submitted by Dondero, and prepare list of draft objections per each exhibit and witness proffered	2.40
04/03/21	M Abdul-Jabbar	Review hearing transcripts in connection with preliminary injunction and contempt hearing	1.10
04/03/21	M Abdul-Jabbar	Analyze files and revise and finalize draft cross-examination outline for Dondero in connection with his taking the stand in opposition to motion to compel preservation	3.20
04/03/21	M Abdul-Jabbar	Confer with N. George and S. Franks in connection with research questions relating to Monday hearing on motion to compel preservation	.70
04/03/21	M Abdul-Jabbar	Finalize Danley cross examination outline and packet of materials for P. Montgomery in connection with hearing preparation	1.90
04/03/21	PH Montgomery	Communications with team regarding hearing preparation (.8); prepare for hearing (1.2)	2.00
04/03/21	MA Clemente	Address emails regarding exhibits and testimony (.5); address emails regarding district court stipulation (.2); analysis of timing for district court schedule (.3)	1.00
04/04/21	J Hoffman	Research in connection with arguments for cross-exam for preservation hearing (2.8); confer with T. Nifong re: same	6.30

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		(0.7); draft arguments for cross-exam (0.8); review comments to order and provide analysis, recommendation of same (0.4); review, revise oral argument outline (0.3), review, revise cross-exam outline (0.5); assist with preparation for preservation hearing (0.8)	
04/04/21	N George	Revise objection chart for upcoming hearing (.2); revise Dondero cross-examination outline based on J. Morris' comments (.4)	.60
04/04/21	PP Reid	Review materials for preservation hearing (1.2); emails with Sidley team regarding same (.3)	1.50
04/04/21	CM Rognes	Correspond with T. Nifong re: preservation motion hearing	.10
04/04/21	M Abdul-Jabbar	Revise draft hearing materials for Monday hearing	1.70
04/04/21	PH Montgomery	Review and revise directs, crosses, and oral argument materials for hearing preparation (4.3); prepare evidentiary objection materials and related caselaw (4.1)	8.40
04/04/21	MA Clemente	Study P. Montgomery hearing outline (.6); analysis of hearing strategy (.7); analysis of preservation pleadings (.9)	2.20
04/04/21	T Nifong	Draft objections to Dondero exhibits and witness list (1.7); draft Dondero cross examination questions for UCC motion to preserve hearing (3.1); correspond with C. Rognes regarding same (.1); confer with J. Hoffman regarding same (.7); UCC motion to compel preservation hearing preparation (2.4); litigation research in connection with Dondero's exhibit and witness list (2.7)	10.70
04/05/21	PP Reid	Telephone conference(s) and emails with Sidley team regarding preservation hearing (.4); participate in call with FTI regarding case issues (.4); participate (in part) in preservation hearing (1.6)	2.40
04/05/21	M Abdul-Jabbar	Participate in hearing re: preservation motion to compel (1.9); review materials for same (.1)	2.00
04/05/21	J Hoffman	Revise witness, exhibit list (0.3); drafted amended notice (0.3); prepare for hearing on preservation motion (2.0); attend hearing on preservation hearing (1.9); calls, correspondence with N. Cade re: hearing materials and related preparation (0.4)	4.90
04/05/21	PH Montgomery	Prepare for discovery hearing (4.8); correspond with T. Nifong regarding hearing (.4); attend and argue at hearing regarding motion for preservation, including updated exhibit list (1.9); call with M. Clemente regarding hearing and stipulation (.4)	7.50
04/05/21	NP Cade	Communication with attorney team regarding hearing materials (.4); preparation of hard copy binders of hearing materials per court rules (2.0); preparation of index of same (.5); preparation of case binder per court rules (.6); coordination of all binders to	4.70

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		be delivered to court chambers (.4); prepare for and efile amended witness and exhibit list with exhibits (.8)	
04/05/21	MA Clemente	Call with P. Montgomery re: hearing strategy (.4); participate in discovery hearing (1.9); emails with J. Pomerantz re: common interest agreement (.2); update email with M. Kirschner re case issues (.2); address questions from P. Montgomery in preparation for discovery hearing (.5)	3.20
04/05/21	A Russell	Correspond with Sidley litigation team re preparation for preservation hearing (.4); attend hearing on Committee's preservation motion (1.9); review Committee reply in support of preservation motion (.2).	2.50
04/05/21	EA Bromagen	Attend hearing on Dondero document preservation dispute	1.90
04/05/21	T Nifong	Confer with P. Montgomery re: UCC motion to compel preservation hearing (.4); participate in UCC motion to compel preservation hearing (1.9); prepare for UCC motion to compel preservation hearing (5.7); draft letter to Bonds Ellis re: complying with preservation order (.5)	8.50
04/05/21	R Fink	Attend Committee's preservation motion hearing (1.9); research and revise summary and schedule of pending HCM adversary and appellate proceedings (.3)	2.20
04/06/21	T Nifong	Draft letter to Dondero's counsel re: compliance with preservation order	.80
04/06/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
04/06/21	CM Rognes	Confer with opposing counsel and P. Montgomery re: CLO Holdco adversary (0.3); correspond with P. Montgomery re: conference with opposing counsel (0.1)	.40
04/06/21	M Abdul-Jabbar	Revise draft Bonds Ellis letter regarding Judge's order granting motion to compel	.80
04/06/21	MA Clemente	Update email with M. Kirschner (.2); review draft scheduling motion and stipulation for district court appeal (.3); email with Rukavina re: stipulation (.1); review common interest agreement (.4); address Dondero email re: extension on CLOH complaint (.1)	1.10
04/06/21	PH Montgomery	Settlement conference with J. Kane regarding adversary (.3); call with C. Rognes regarding same (.1); review and revise common interest agreement (.8); related communications with Sidley team regarding same (.2)	1.40
04/07/21	T Nifong	Draft Common Interest Agreement between the Debtor, PSZJ, the Committee, Sidley, M. Kirschner, and Teneo	1.30
04/07/21	T Nifong	Participate in standing Sidley/FTI pre-UCC call	.30

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/07/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
04/07/21	M Abdul-Jabbar	Review common interest and confidentiality agreement	.20
04/07/21	NP Cade	Communication with J. Hoffman regarding notices (.3); research into dockets from three current appeals matters for attorney review (.4)	.70
04/07/21	MA Clemente	Communicate with P. Montgomery re: preservation order (.3); review preservation order (.1); address timing issues and concerns with M. Kirschner retention (.5)	.90
04/07/21	PP Reid	Telephone conference with FTI regarding various case issues (.3); review materials for same (.2)	.50
04/07/21	EA Bromagen	Review of Teneo diligence requests and emails with E. Cheng and C. Rognes re same	.50
04/08/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.10
04/08/21	CM Rognes	Review order re: motion to preserve (0.1); draft summary of CLO Holdco adversary status (0.2); research re: pleadings (0.3)	.60
04/08/21	T Nifong	Draft letter to Dondero's counsel re: complying with preservation order	.30
04/08/21	MA Clemente	Review order on preservation (.3); address M. Kirschner emails regarding various issues (.3); review debtor draft of direct appeal response (.7); analysis of Dondero entities stay papers (.7)	2.00
04/08/21	J Hoffman	Confer with Sidley team regarding strategy for appeals	.30
04/08/21	J Hoffman	Draft notices of appearance for appeals	.70
04/08/21	A Russell	Review, analyze Debtor's response re direct appeal re confirmation order.	.40
04/08/21	J Yu	Research key pleadings regarding arbitration and other litigation issues	.60
04/09/21	CM Rognes	Call with T. Nifong re: spoliation	.30
04/09/21	T Nifong	Draft letter to Bonds Ellis re: complying with preservation notice	.40
04/09/21	T Nifong	Call with C. Rognes re: spoliation motion	.30
04/09/21	MA Clemente	Review common interest agreement (.5); assess M. Kirshner retention issues and structure (.4)	.90
04/11/21	CM Rognes	Review documents re: previous litigations	.50
04/11/21	PH Montgomery	Review and revise letter to Bonds Ellis regarding preservation	.40

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		and related communications (.2); review and revise common interest agreement and related communications (.2)	
04/12/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.3); emails to E. Bromagen and FTI regrading same (.1)	.40
04/12/21	J Hoffman	Research, review Fifth Circuit rules, procedures (1.2); review, revise response to petition for certification (0.8); correspondence with Sidley team regarding same (0.3); draft certificate of interested parties (0.4); review, revise entry of appearance (0.3)	3.00
04/12/21	DR Carpenter	Advise regarding Response to Petition for Review	.50
04/12/21	PH Montgomery	Review and revise preservation letter to Dondero counsel (.3); call with FTI and Sidley team regarding pending tasks (.5); call with M. Clemente re outstanding tasks (.4); communications with FTI regarding agreement (.2); review and revise notice of appearance and brief for 5th Circuit and related communications (1.3); correspond with C. Rognes regarding adversary issues (.2); analyze adversary issues for same (.3); review of materials for trustee (1.2)	4.40
04/12/21	A Russell	Review, analyze common interest stipulation and correspond with Sidley team re same.	.30
04/12/21	MA Clemente	Assess various issues regarding filing of 5th Circuit certification support (.5); call with P. Montgomery regarding same (.4); address email from M. Kirschner regarding various issues (.2)	1.10
04/12/21	NP Cade	Communications with J. Hoffman regarding 5th Circuit (.6); research Fifth Circuit local rules regarding notice of appearance form (.5); prepare form for P. Montgomery (.5); cite check Committee Response to Petition for Direct Appeal (.9); prepare materials for efile (.6)	3.10
04/12/21	EA Bromagen	Review and compile diligence items re Teneo request	1.10
04/12/21	PP Reid	Review draft common interest agreement (.9); emails with Sidley team regarding same common interest agreement (.1); participate in call with FTI and Sidley team re various issues (.5); emails with Sidley team regarding privilege issues (.2);	1.70
04/12/21	CM Rognes	Research re: spoliation (.7); revise scheduling order (.2); attend UCC professional call with Sidley and FTI (.4); correspond with P. Montgomery re: CLO Holdco adversary (.2); correspond with Sidley team re: settlement (.1); correspond with J. Morris re same (.1); review tax documents (.1);	1.80
04/12/21	T Nifong	Draft letter to Bonds Ellis re: complying with preservation order (.3); correspond with C. Rognes re: same (.2); correspond	.70

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		with P. Montgomery re: letter to Bonds Ellis and complying with preservation (.2)	
04/13/21	PP Reid	Emails with Sidley team regarding Grant Scott	.30
04/13/21	J Hoffman	Revise NOAs	.50
04/13/21	J Hoffman	Research regarding intervention rights	1.50
04/13/21	J Hoffman	Draft analysis of research regarding intervention rights	.30
04/13/21	J Hoffman	Call with E. Bromagen to discuss response to petition for certification	.10
04/13/21	MA Clemente	Call with P. Montgomery re: appellate issues (.5); correspond with E. Bromagen re: appellate issues (.2); address emails regarding appellate intervention (.5); call with P. Montgomery re: privilege issues (.3); assess privilege issues re: M. Kirshner (.6); call with E. Bromagen re: privilege issues (.3); email with E. Bromagen re: M. Kirshner (.1); review Dondero group district court stay papers (.9)	3.40
04/13/21	PH Montgomery	Calls with Sidley team regarding appeal issues (.8); emails with Sidley team regarding same (.5); review of cases and appeal issues for same (.9)	2.20
04/13/21	NP Cade	Communications with J. Hoffman regarding filings (.3); prepare for and efile attorney Notices of Appearance in three Appeals in District Court (1.4)	1.70
04/13/21	EA Bromagen	Emails with IT re sharefile for sharing diligence items with Teneo (.1); emails with C. Rognes re collection of diligence items (.1); review of diligence items and organization of same (.5)	.70
04/13/21	CM Rognes	Revise common interest agreement (.4); review tax documents (.4); research re: spoliation (.9); correspond with M. Clemente, P. Reid, and P. Montgomery re: settlement (.1); correspond with P. Montgomery and P. Reid re: privilege (.1)	1.90
04/14/21	R Fink	Review draft of UCC objection to motions for stay pending appeal	.10
04/14/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); email to E. Bromagen regarding same (.1)	.30
04/14/21	R Fink	Review Charitable DAF Fund complaint	.20
04/14/21	MA Clemente	Emails with E. Bromagen re: draft of district court appellate response (.3); read DAF lawsuit (.8); address implications of DAF lawsuit (.6); review materials for M. Kirschner (.7)	2.40
04/14/21	PH Montgomery	Review and revise document regarding privilege issues (.4); communications with debtors regarding privilege issues (.2);	.80

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		communications with opposing counsel regarding meet and confer (.2)	
04/14/21	A Russell	Review, comment on Committee's objection to motions to stay confirmation order filed in district court (.8); correspond with Sidley team re same (.3); review, analyze DAF complaint (.9); correspond with Sidley team re same (.2); review, analyze response pleadings filed in Committee's CLOH adversary (.3); review, analyze Debtor's motion to disqualify Wick Phillips (.4).	2.90
04/14/21	C Clark	Prepare addition to Notice of Appearance and Request for Service for P. Montgomery, P. Reid and J. Hoffman (.8); assemble and electronically file same (.3)	1.10
04/14/21	NP Cade	Correspond with J. Hoffman re district court filings (.3); prepare for and efile Montgomery Amended Notice of Appearance in Fifth Circuit case (.5)	.80
04/14/21	J Hoffman	Research case law regarding 8013 authority	1.90
04/14/21	T Nifong	Confer with C. Rognes re: CLO Holdco motion to withdraw reference	.40
04/14/21	T Nifong	Analyze CLO Holdco motion to withdraw reference	1.10
04/14/21	T Nifong	Participate in Standing Sidley/FTI pre-UCC call regarding various case issues	.40
04/14/21	EA Bromagen	Discuss Teneo diligence items and Committee with M. Kirschner (.2); emails with M. Kirschner re same (.2); review of DAF complaint against Debtor (.5)	.90
04/14/21	CM Rognes	Attend pre-UCC call with Sidley and FTI (0.4); revise common interest agreement (0.5); review and analyze CLO Holdco adversary motions to dismiss (2.4); calculate deadlines regarding responses (0.1); research regarding spoliation (0.2); correspond with P. Montgomery regarding scheduling order (0.1); correspond with P. Montgomery regarding amendment (0.1); correspond with P. Montgomery regarding CLO Holdco adversary (0.2); correspond with opposing counsel regarding CLO Holdco adversary (0.1); correspond with T. Nifong regarding motion to withdraw the reference research (0.4); correspond with e-discovery vendor regarding credentials (0.1); correspond with P. Montgomery regarding common interest agreement (0.1)	4.70
04/15/21	R Fink	Review Debtors' response to motions for stay pending appeal (.2); Review emails from team regarding Committee's response re- same (.1)	.30
04/15/21	CM Rognes	Document review (0.2); review note complaints (0.2); research regarding statute of limitations (0.3); review and analyze CLO	8.60

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		Holdco adversary motions to dismiss (1.1); research regarding motion to withdraw the reference (0.3); draft task list regarding litigation (0.3); review chronologies (0.1); correspond with P. Montgomery regarding scheduling order (0.1); revise scheduling order (0.2); revise common interest agreement (0.2); correspond with M. Clemente, P. Montgomery, and litigation trustee regarding bankruptcy status (1.5); correspond with P. Montgomery and T. Nifong regarding CLO Holdco adversary response strategy (0.5); draft outline regarding responses to motions to dismiss (2.3); correspond with P. Montgomery regarding extension (0.1); correspond with opposing counsel regarding extension of response deadline (0.1); correspond with P. Montgomery regarding statute of limitations (0.1); correspond with T. Nifong regarding document review (0.1); call with M. Abdul-Jabbar and T. Nifong regarding response strategy (0.9)	
04/15/21	PH Montgomery	Call with Litigation trustee regarding claims issues (1.3); team call regarding adversary issues (.5); call with C. Rognes regarding adversary tasks (.3); communications with E. Bromagen regarding research (.2); communications with debtors counsel regarding testimony issues (.2); communications with C. Rognes regarding response timing and strategy issues (.4)	2.90
04/15/21	A Russell	Review, analyze and revise Committee's objection to motions to stay in district court (.7); correspond with Sidley team re same (.3).	1.00
04/15/21	PP Reid	Emails and telephone conference regarding common interest agreement (.5); emails regarding Dondero's property (.2); review and revise objection to stay motion (.5); emails regarding same (.2)	1.40
04/15/21	MA Clemente	Call with P. Montgomery and M. Kirschner re: litigation issues (1.3); revise stay objection (1.0); read 5th Circuit papers (1.2); prepare for call with M. Kirschner (.5); emails with Pachulski re: common interest agreement (.2)	4.20
04/15/21	M Abdul-Jabbar	Participate in litigation strategy call with C. Rognes and T. Nifong regarding responding to pending motions to dismiss CLO Holdco complaint (.9); review related case law and send to C. Rognes (.2)	1.10
04/15/21	C Clark	Prepare download and assemble cases cited with in multiple motions to dismiss and motion to withdraw (2.9); create index of cases cited and coordinate delivery of binder to P. Montgomery (.8)	3.70
04/15/21	J Hoffman	Analyze pleadings in connection with appeals cases (1.0); correspondence with T. Nifong regarding same (0.2)	1.20

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/15/21	T Nifong	Prepare spoliation evidence against Dondero for M. Kirschner (.5); correspond with C. Rognes re: preparing spoliation evidence for M. Kirschner (.1); confer with J. Hoffman re: CLO Holdco transaction motion to withdraw reference (.2); call with P. Montgomery and C. Rognes re: CLO Holdco transaction motion to dismiss and motion to withdraw reference (.5); call with C. Rognes and M. Abdul Jabbar re: CLO Holdco transaction motion to dismiss and motion to withdraw reference (.9); issue tag select documents for M. Kirschner to review (1.1)	3.30
04/15/21	DM Twomey	Emails with team regarding objection to stay motions	.20
04/16/21	R Fink	Emails with team re Committee objection to stay in district court	.10
04/16/21	A Russell	Review, analyze revised and proposed final Committee objection to motions to stay in District Court (.4); correspond with Sidley team re comments and filing of same (.2).	.60
04/16/21	MA Clemente	Call with Pachulski re: common interest agreement (.3); revisions to stay opposition (1.1); emails with A. Russell and E. Bromagen re: stay opposition (.4); email with M. Kirschner re: various issues (.2); further review of stay opposition (.4)	2.40
04/16/21	M Abdul-Jabbar	Begin review of draft response outline relating to objections to Dondero, Scott, CLO Holdco and Highland Dallas Foundation's motions to dismiss	.20
04/16/21	CM Rognes	Draft outline regarding motions to dismiss responses (1.7); research regarding motions to dismiss responses (2.7); review motions to dismiss CLO Holdco adversary proceeding (0.2); research regarding consolidated responses (0.1); document review (0.4); correspond with P. Montgomery, M. Clemente, and Pachulski regarding strategy (0.2); correspond with opposing counsel in CLO Holdco adversary re: extensions (0.2); correspond with T. Nifong re: document review (0.1); correspond with J. Hoffman re: consolidation (0.1); correspond with P. Montgomery re: consolidation and motion for preliminary injunction (0.1); correspond with opposing counsel in CLO Holdco adversary regarding notice of hearing (0.2); correspond with P. Montgomery re: CLO Holdco adversary extensions (0.1); correspond with M. Abdul-Jabbar regarding motions to dismiss response strategy (0.1); review petitions with court of appeals regarding direct appeal (0.2)	6.40
04/16/21	NP Cade	Communication with J. Hoffman regarding appeal documents (.4); draft Notice of Appearance for J. Hoffman in appeal matter (.3); efile same (.2); prepare for and efile Committee's objection to motion to stay (.3)	1.20

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/16/21	T Nifong	Issue code documents for M. Kirschner	1.80
04/16/21	T Nifong	Call with J. Hoffman re: motion to withdraw the reference	.40
04/16/21	T Nifong	Assemble spoliation evidence for M. Kirschner	.60
04/16/21	J Hoffman	Call with T. Nifong to discuss MWR responses (0.4); revise supplemental declaration (0.2); review, revise response to stay motions (1.0); analyze pleadings in connection with same (0.5); analyze motions to withdraw the reference (0.7); research Stern-related issues (0.8); correspondence with Sidley team regarding same (0.3); draft additional NOAs for APs (1.5)	5.40
04/16/21	PH Montgomery	Call regarding privilege issues with debtor	.10
04/16/21	DM Twomey	Emails with Sidley team regarding objection to stay motion, related issues and review same	.40
04/17/21	MA Clemente	Address emails regarding motion to withdraw the reference (.4); email with FTI re: M. Kirshner (.1); email with M. Kirschner (.1); strategy regarding withdrawal of the reference (.4)	1.00
04/17/21	CM Rognes	Review motion to expedite (0.2); correspond with J. Hoffman regarding motion to expedite (0.1)	.30
04/18/21	MA Clemente	Address Kirschner emails re: documents and related issues (.4); review of revised common interest agreement (.3); address withdrawal of reference issues (.3)	1.00
04/18/21	CM Rognes	Review revisions to common interest agreement	.10
04/19/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
04/19/21	M Abdul-Jabbar	Confer with E. Cheng and professional team relating to strategy call (.3); review revised draft outline regarding responding to motions to dismiss (.3); confer with C. Rognes, T. Nifong, and P. Montgomery re: same (.5)	1.10
04/19/21	T Nifong	Research motion to withdraw the reference for CLO Holdco Adversary Proceeding	4.20
04/19/21	T Nifong	Call with P. Montgomery, C. Rognes, M. Abdul Jabbar re: CLO Holdco motion to withdraw reference and motion to dismiss	.50
04/19/21	PP Reid	Participate (in part) in call with FTI regarding Kirschner issues and document retention	.40
04/19/21	CM Rognes	Revise deadlines regarding CLO Holdco adversary (0.1); draft outline regarding motions to dismiss responses (2.0); research regarding pleading standards (1.6); research regarding money had and received (0.6); research regarding discovery rule (0.4); attend weekly professionals call with Sidley and FTI regarding	9.60

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		various issues (0.8); draft agenda regarding call with litigation trustee (0.2); document review regarding litigation trustee (1.4); call with P. Montgomery, M. Abdul-Jabbar, and T. Nifong regarding CLO Holdco adversary response strategy (0.5); draft response to motions to dismiss (1.6); correspond with M. Abdul-Jabbar regarding pleading standard (0.2); correspond with opposing counsel regarding deadlines (0.1); correspond with J. Hoffman regarding deadline extensions (0.1)	
04/19/21	EA Bromagen	Review of Teneo diligence items listing and emails with E. Cheng re same	.30
04/19/21	J Hoffman	Correspondence with C. Rognes regarding strategy for AP deadline extensions	.20
04/19/21	MA Clemente	Analysis of information requested by M. Kirschner	1.70
04/19/21	PH Montgomery	Call with FTI regarding outstanding tasks (.8); call with C. Rognes, M. Abdul-Jabbar, and T. Nifong regarding adversary issues (.5); communications with the litigation trustee regarding document requests (.1); review of claims related information (4.1)	5.50
04/19/21	NP Cade	Communication with J. Hoffman regarding court filings (.4); draft Notices of Appearance for P. Reid, P. Montgomery and M. Clemente in 550 appeal (.7); prepare for and efile same (.4); research court's website for form of Pro Hac Vice (.3); update pleadings management folders with newly filed documents (.3)	2.10
04/20/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); emails to FTI and E. Bromagen regarding same (.1)	.30
04/20/21	M Abdul-Jabbar	Calls with T. Nifong regarding research relating to motion to withdraw the reference including review attorney notes related to same	.90
04/20/21	M Abdul-Jabbar	Review motions to dismiss and to withdraw and analysis relating to same (1.7); analyze motion to withdraw the reference, review related case law, and draft outline for objection/response brief relating to same (2.1)	3.80
04/20/21	CM Rognes	Document review regarding litigation trustee (1.4); update litigation task list (0.4); revise common interest agreement (0.5); review notices of hearing and update deadlines (0.3); call with M. Clemente, P. Montgomery, FTI, and litigation trustee regarding next steps (1.5); review shared services agreements (0.2); review research regarding statute of limitations (0.1); correspond with opposing counsel re: deadline extensions (0.1); correspond with P. Montgomery re: deadline extensions (0.1); correspond with litigation trustee regarding documents	4.90

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		(0.1); review purchase and sale agreement (0.1); correspond with P. Montgomery regarding common interest agreement (0.1)	
04/20/21	EA Bromagen	Call with Teneo, FTI, and Sidley re litigation investigation (1.5); review of documentation in preparation of same (.2); emails with M. Kirschner re materials for litigation investigation (.4)	2.10
04/20/21	MA Clemente	Call with M. Kirschner, FTI and team regarding litigation issues (1.5); prep for call with Kirschner by reviewing agenda and Kirschner questions (1.1); review Kirschner engagement terms (.4); email with Bromagen re: engagement terms (.1)	3.10
04/20/21	PH Montgomery	Call with M. Kirschner regarding litigation issues (1.5); call with opposing counsel regarding response times (.1); analyze adversary issues (.8); call with team regarding adversary proceedings (.5); communications with C. Rognes regarding common interest agreement (.2); review and revise timelines (1.5)	4.60
04/20/21	J Hoffman	Multiple calls with T. Nifong re: motion to withdraw the reference (0.5); research re: motion to withdraw the reference arguments (2.2); analyze pleadings in connection with same (0.3)	3.00
04/20/21	T Nifong	Calls with M. Abdul-Jabbar re: motion to withdraw reference (.9); multiple calls with J. Hoffman re: motion to withdraw reference (.5); research case law re: motion to withdraw reference (4.3); analyze Acis motion to withdraw the reference and related proceedings (1.5); correspond with J. Hoffman re: purchase and sale agreement (.2); research re: purchase and sale agreement (.4); correspond with M. Abdul-Jabbar re: purchase and sale agreement (.1); research case law re: adversary proceeding (.6); review related emails on relativity (.3)	8.80
04/21/21	R Fink	Revise summary and schedule of pending HCM adversary and appellate proceedings including emails with E. Bromagen regarding same	.10
04/21/21	CM Rognes	Revise common interest agreement (0.5); correspond with M. Clemente, P. Montgomery, A. Russell, and E. Bromagen re: common interest agreement (0.3); correspond with UCC re: common interest agreement (0.3); research re: motion to withdraw the reference (0.2); update deadlines re: CLO Holdco adversary (0.2); research re: spoliation (0.2); confer with P. Montgomery and Pachulski re: document requests (0.6); update list of outstanding requests (0.3); draft responses re: CLO Holdco adversary motions to dismiss (0.6); draft chronologies re: transactions (0.9); correspond with P. Montgomery re: CLO Holdco extensions (0.2); strategize with P. Montgomery re:	5.70

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		Hunter Mountain Trust and litigation strategy (0.8); document review re: Hunter Mountain trust (0.2); correspond with M. Clemente re: litigation strategy (0.1); correspond with P. Montgomery re: pending litigation (0.3)	
04/21/21	EA Bromagen	Review of common interest agreement and comments to same (.3); emails with C. Roans re same (.2)	.50
04/21/21	MA Clemente	Address issues with common interest agreement (.4); emails with C. Rognes re: common interest agreement (.2); review updated litigation schedule (.4); analysis of claims and theories (2.2)	3.20
04/21/21	J Hoffman	Correspondence with Sidley team re: adversary pleadings	.30
04/21/21	PH Montgomery	Call with C. Rognes, T. Nifong and M. Abdul-Jabbar regarding briefing (.6); call with C. Rognes regarding other deadlines (.3); communications with team regarding preparations for M. Kirschner materials (.5); communications with J. Morris regarding discovery (.1); communications with C. Rognes regarding informational requests (.2); review and revise materials and for same (.1)	1.80
04/21/21	A Russell	Review, analyze Committee member questions re common interest agreement with Debtor and correspond with Sidley team re answers to same.	.40
04/21/21	T Nifong	Assemble key spoliation evidence (2.3); correspond with M. Abdul-Jabbar re: motion to withdraw the reference and Hunter Mountain transaction (.2)	2.50
04/22/21	CM Rognes	Finalize common interest agreement (0.3); document review re: CLO Holdco (2.1); draft chronologies re: transactions (1.3); draft response re: CLO Holdco adversary proceeding motions to dismiss (3.4); review documents re: litigation trustee (0.4); correspond with P. Montgomery re: outstanding tasks (0.1); correspond with FTI re: Hunter Mountain Trust (0.1)	7.70
04/22/21	EA Bromagen	Review of DAF complaint	.40
04/22/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.30
04/22/21	M Abdul-Jabbar	Call with T. Nifong regarding motion to withdraw the reference (.2); review second letter to opposing counsel regarding preservation order (.2); correspond with T. Nifong regarding same (.2)	.60
04/22/21	J Hoffman	Analyze settlement motion and related pleadings	.50
04/22/21	MA Clemente	Respond to emails with Sidley team re: common interest agreement (.4); analysis of Hunter Mountain documents and legal theories (1.4)	1.80

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/22/21	PH Montgomery	Communications with team regarding follow ups for order on preservation	.30
04/22/21	A Russell	Review, analyze briefing in UBS adversary proceeding.	.40
04/22/21	T Nifong	Correspond with M. Abdul-Jabbar re: second letter to Bonds Ellis re: compliance with preservation order (.2); draft second Letter to Bonds Ellis re: compliance with preservation order (1.1); analyze previous Acis motion to withdraw the reference and transcript (1.2); call with M. Abdul-Jabbar re: motion to withdraw the reference (.2); research for motion to withdraw the reference (1.2)	3.90
04/23/21	M Abdul-Jabbar	Revise second letter to opposing counsel regarding complying with preservation order (1.0); confer with C. Rognes relating to motion to dismiss response (.3); participate in conference call with P. Montgomery, C. Rognes and T. Nifong relating to litigation strategy concerning CLO Holdco complaint (.6); calls with T. Nifong regarding motion to withdraw the reference and research strategies (.6)	2.50
04/23/21	C Clark	Review summary for extension of time to file claims and download cases cites per same (.5); prepare materials for C. Rognes to review (.3)	.80
04/23/21	CM Rognes	Document review re: litigation trustee (0.3); revise deadlines re: CLO Holdco adversary proceeding (0.2); correspond with UCC re: common interest agreement (0.2); draft agenda re: team call (0.1); correspond with P. Montgomery, M. Abdul-Jabbar, and T. Nifong re: CLO Holdco adversary proceeding strategy (0.6); correspond with P. Montgomery re: common interest agreement (0.1); research re: statute of limitations (0.5); correspond with M. Abdul-Jabbar re: motion to withdraw the reference (0.3); correspond with e-discovery vendor re: database (0.1); correspond with P. Montgomery re: document review (0.1); review preservation letter (0.1); review preservation letter response (0.1)	2.70
04/23/21	MA Clemente	Read sanctions papers (.8); address appellate strategy (.6); address emails related to Kirschner requests (.4)	1.80
04/23/21	PH Montgomery	Communications with J. Morris regarding document issues (.2); correspond with Sidley team regarding same (.2); review and revise preservation letter for J. Dondero counsel and related communications (.5); call with M. Abdul-Jabbar, C. Rognes and T. Nifong regarding motion to withdraw reference (.6)	1.50
04/23/21	A Russell	Review, analyze Debtor's motion to find parties in contempt and related briefing re District Court complaint against Seery.	.90
04/23/21	T Nifong	Draft argument outline for motion to withdraw the reference	7.50

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		(.4); email with M. Abdul-Jabbar re: second letter to Bonds Ellis re: complying with preservation motion (.1); draft second letter to Bonds Ellis re: complying with preservation motion (.2); call with P. Montgomery, M. Abdul-Jabbar, and C. Rognes re: CLO Holdco adversary proceeding strategy (.6); research case law re: motion to withdraw the reference jury waiver (5.6); call with M. Abdul-Jabbar regarding motion to withdraw the reference jury waiver case law research (.2); call with M. Abdul-Jabbar re: drafting argument outline for motion to withdraw the reference (.4)	
04/24/21	CM Rognes	Finalize common interest agreement	.10
04/24/21	PH Montgomery	Communications with J. Morris and Meta-E regarding document issues	.50
04/25/21	MA Clemente	Emails with A. Russell re: depositions (.2); review email questions from M. Kirschner (.3)	.50
04/26/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
04/26/21	M Abdul-Jabbar	Provide comments on draft of response argument and case outline relating to motion to withdraw (1.5); calls with T. Nifong regarding same (.7)	2.20
04/26/21	CM Rognes	Revise scheduling order (0.3); attend weekly professionals call with Sidley and FTI (0.6); correspond with FTI re: documents (0.1); document review re: CLO Holdco re: litigation trustee (1.2); draft chronology re: CLO Holdco (1.0); correspond with M. Abdul-Jabbar re: motion to withdraw the reference (0.1); correspond with P. Montgomery re: common interest agreement (0.1)	3.40
04/26/21	PP Reid	Participate in telephone conference with FTI regarding common interest requests	.50
04/26/21	MA Clemente	Detailed response to numerous M. Kirschner questions (.3); review briefing stipulation for stay pending appeal (.2); email with A. Russell re: depositions (.1); analysis of liability theories (1.3)	1.90
04/26/21	PH Montgomery	Review of materials for litigation trustee	.20
04/26/21	A Russell	Correspond with Sidley and Latham teams re depositions scheduled in UBS adversary (.3); review, analyze Dondero and UBS briefing in UBS adversary (.5).	.80
04/26/21	T Nifong	Call with M. Abdul-Jabbar re: motion to withdraw the reference (.2); issue code select documents for M. Kirschner to review (1.8); draft motion to withdraw the reference outline (2.7); email to M. Abdul-Jabbar re: draft motion to withdraw the reference outline (.1); calls with M. Abdul-Jabbar re: draft	5.30

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		motion to withdraw the reference outline (.5)	
04/27/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
04/27/21	M Abdul-Jabbar	Correspond with C. Rognes regarding draft work plan relating to CLO Holdco matter (.2); draft talking points for call with Kirschner, and review files in connection with same (2.6); correspond with T. Nifong regarding adversary motions (.1)	2.90
04/27/21	CM Rognes	Draft chronology re: CLO Holdco (0.3); finalize common interest agreement (0.3); draft response re: CLO Holdco adversary motions to dismiss (0.7); revise scheduling order (1.5); draft investigation work plan/consolidated issue sheet (2.9); correspond with P. Montgomery re: common interest agreement (0.1); correspond with M. Abdul-Jabbar re: work plan (0.1); correspond with litigation trustee re: call agenda (0.1); strategize with P. Montgomery re: scheduling order (0.3); strategize with M. Abdul-Jabbar re: discovery for CLO Holdco adversary (0.1); correspond with T. Nifong re: trustee research (0.1); confer with J. Hoffman re: scheduling order strategy (0.3); correspond with P. Montgomery re: workplan (0.1)	6.90
04/27/21	J Hoffman	Review, analyze motion to reconsider (0.5); correspondence with litigation team re: same (0.2); call with C. Rognes re: adversary proceeding scheduling order (0.3)	1.00
04/27/21	PH Montgomery	Call with C. Rognes regarding scheduling issues (.3); review and revise draft scheduling order (.3); correspondence with J. Morris regarding discovery issues (.3); evaluate adversary issues for call to M. Clemente (.4); communications with team regarding preparations for trustee meetings (.4); review of documents related to trustee inquiries (2.0)	3.70
04/27/21	A Russell	Review, analyze DAF/Get Good motion to modify Seery CEO retention	.50
04/27/21	T Nifong	Correspond with P. Montgomery, M. Abdul-Jabbar, C. Rognes re: review of documents for M. Kirschner (.1); correspond with C. Rognes re: trustee research (.1); review and issue tag documents for M. Kirschner (3.8); research case law re: pleading (.5); correspond with M. Abdul-Jabbar re: motion to withdraw the reference (.1)	4.60
04/28/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
04/28/21	R Fink	Attend virtually hearing (in part) regarding motion for protective order, motion to modify order granting leave to file under seal, and motion for alternative service of subpoena	1.10
04/28/21	M Abdul-Jabbar	Revise draft litigation strategy relating to CLO Holdco and Hunter Mountain adversary proceedings (2.2); participate in	3.90

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		call with M. Kirschner and P. Montgomery, among others relating to litigation trustee (.9); analyze key correspondence relating to pending claims (.8)	
04/28/21	EA Bromagen	Attend hearing on UBS adversary proceeding (1.2); call with Teneo FTI, and Sidley teams re litigation trustee diligence (.9)	2.10
04/28/21	CM Rognes	Research re: discovery rule (1.1); research re: general creditor (0.6); draft responses to CLO Holdco adversary motions to dismiss (3.5); draft talking points re: litigation trustee call (1.1); draft investigation work plan (1.5); revise scheduling order (0.2); draft correspondence to opposing counsel re: scheduling order (0.1); correspond with P. Montgomery re: chronologies (0.1); confer with litigation trustee, M. Clemente, P. Montgomery, and M. Abdul-Jabbar re: investigation (0.9); review limited partnership agreements (0.2); correspond with M. Clemente re: scheduling order (0.1); correspond with T. Nifong re: trustee research (0.1); correspond with M. Abdul-Jabbar re: talking points (0.1); document review re: Hunter Mountain Trust (0.2); correspond with P. Montgomery re: investigation (0.2)	10.00
04/28/21	MA Clemente	Participate in service hearing (1.2); emails with M. Kirschner re: various issues (.2); comment on outline of issues for discussion with Kirschner (.3); call with Kirschner, Sidley and FTI teams re: various issues (.9); additional call with M. Kirschner re: various issues (.3); prepare for call with M. Kirschner (.8); prepare litigation strategy (2.6)	6.30
04/28/21	PH Montgomery	Attend hearing regarding UBS motion (1.2); call with Kirschner regarding litigation trust issues (.9); review of documents related to trustee issues (6.4)	8.50
04/28/21	J Hoffman	Attend hearing (in part) on UBS motion to seal	1.00
04/28/21	A Russell	Attend in part hearing in UBS adversary re motion to seal complaint and motion for alternative service.	1.00
04/28/21	T Nifong	Research litigation trustee issues (2.1); email to C. Rognes re: research for same (.1); draft research summary for P. Montgomery re: litigation trustee research (.5); analyze documents re: Hunter Mountain transaction (.4); correspond with Sidley team re: Hunter Mountain transaction documents (.2); investigate documents re: Hunter Mountain transaction (1.1); emails to P. Montgomery re: Hunter Mountain transaction documents (.1)	4.50
04/29/21	M Abdul-Jabbar	Review key documents in Relativity database in connection with CLO Holdco matter	.30
04/29/21	CM Rognes	Document review re: Hunter Mountain trust (0.4); draft responses re: CLO Holdco adversary proceeding motions to	11.00

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		dismiss (4.2); research re: fraud (2.9); research re: money had and received (0.9); research re: constructive fraud (2.1); correspond with opposing counsel re: Rule 26 conference (0.2); correspond with P. Montgomery re: same (0.3)	
04/29/21	PH Montgomery	Communications with C. Rognes regarding adversary Rule 26 conference	.30
04/29/21	A Russell	Review, analyze DAF/Get Good Trust motion to compel Debtor to produce 2015.3 report (.4); review, analyze Court order re motion to show cause (.1).	.50
04/29/21	MA Clemente	Read get good trust 2015.1 motion (.5); review M. Kirchner agenda for call with Debtor (.3)	.80
04/29/21	J Hoffman	Analyze motion to compel and related pleadings	.30
04/29/21	T Nifong	Review documents re: Hunter Mountain chronology (1.4); email to P. Montgomery re: Hunter Mountain chronology (.1)	1.50
04/30/21	M Abdul-Jabbar	Analyze Hunter Mountain key events timeline (.6); emails with Sidley team relating to same (.3); review draft of 12(b)(6) motion to dismiss (.2); call with T. Nifong regarding adversary motion (.2)	1.30
04/30/21	C Clark	Email with C. Rognes regarding adversary motions (.1); review Dugaboy and Get Good motion to dismiss and download cases cited per same (.6)	.70
04/30/21	CM Rognes	Review, summarize CLO Holdco adversary proceeding motions to dismiss (0.7); draft responses re: CLO Holdco adversary proceeding motions to dismiss (3.3); review clerk correspondence re: preliminary injunction motion (0.1); correspond with P. Montgomery re: clerk's correspondence (0.1); correspond with P. Montgomery re: Rule 26(f) conference (0.1); correspond with M. Abdul-Jabbar re: motion to dismiss responses (0.1)	4.40
04/30/21	J Hoffman	Review, analyze motions to dismiss	.50
04/30/21	MA Clemente	Analysis of Hunter Mountain transaction (2.1); address emails re: scheduling of various suits (.2); analysis of overall litigation strategy (1.3)	3.60
04/30/21	T Nifong	Prepare Hunter Mountain transaction chronology (1.9); review documents for same (1.7); analyze Dugaboy and Get Good motions to withdraw the reference (.4); email to P. Montgomery, M. Abdul-Jabbar, and C. Rognes re: Dugaboy and Get Good motions (.1); call with M. Abdul-Jabbar re: drafting motion to withdraw the reference response brief (.2)	4.30
Task Subtotal			447.60

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
15 Plan and Disclosure Statement			
04/02/21	MA Clemente	Analysis of related party notes treatment under the plan (.3); work on timing including financing and D&O placement (.5)	.80
04/05/21	MA Clemente	Address update on D&O coverage and issues	.40
04/05/21	EA Bromagen	Review of Advisor's request for stay filed in District Court	.30
04/06/21	R Fink	Review cash flow forecast prior to Director/UCC call	.10
04/06/21	MA Clemente	Strategy regarding Dondero district court appeals (.8); analysis of cash flow forecast from Board in preparation for call (.4); analysis of borrowing structures for exit (.6)	1.80
04/06/21	EA Bromagen	Draft email to M. Clemente re litigation trustee role issue (.4); emails with M. Clemente re preservation of post effective date litigation (.2)	.60
04/07/21	MA Clemente	Assess effective date timing, cash needs and financing	.80
04/08/21	MA Clemente	Analysis of effective date requirements (.4); update on D&O issues (.2); review related party note litigations (.4); analysis of court approval for potential financing (1.1)	2.10
04/08/21	EA Bromagen	Review Debtor's response in connection with direct certification to fifth circuit	.30
04/09/21	R Fink	Review Committee response to petition for direct appeal	.10
04/09/21	R Fink	Review Debtor response to petition for direct appeal	.20
04/09/21	J Hoffman	Research regarding Fifth Circuit precedent for issues on appeal	2.40
04/09/21	J Hoffman	Revise response to petition for certification	.60
04/09/21	A Russell	Review, analyze Committee response re direct appeal of confirmation order.	.60
04/09/21	MA Clemente	Revisions to support paper for direct appeal (1.5); email with E. Bromagen re: support paper (.1); work on timing of Effective Date (.9)	2.50
04/09/21	EA Bromagen	Draft Committee response to direct certification to Fifth Circuit (.7); emails with J. Hoffman re filing of same (.2); emails with Sidley team re same (.1); discuss Debtor response with G. Demo (.1); discuss response with M. Clemente (.2)	1.30
04/09/21	EA Bromagen	Discuss control of litigation trust claims with G. Demo (.2); emails with M. Clemente re same (.2)	.40
04/12/21	MA Clemente	Call with E. Bromagen re: various agreement revisions	.40
04/12/21	MA Clemente	Address oversight board composition issues (.9); review oversight board language in claimant trust agreement (.4); revise 5th Circuit support for certification (.7); address further	2.40

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		update on D&O policy (.4)	
04/12/21	EA Bromagen	Review of trust agreement and plan re oversight board (.6); call with M. Clemente re trust agreement revisions (.4); call with M. Hankin and M. Clemente re same (.3); further correspondence with M. Clemente re same (.2); draft summary of process for oversight board member replacement (.6); emails with J. Hoffman re filing of Committee response to direct appeal to Fifth Circuit (.2); review of same (.2)	2.50
04/14/21	DM Twomey	Correspond with M. Clemente regarding status update, trust oversight issues, recent Dondero filings (.30); review emails, related materials regarding same (.20)	.50
04/14/21	MA Clemente	Call with J. Seery re: various issues including effective date timing	.50
04/14/21	EA Bromagen	Draft Committee response to motions for stay pending appeal in District court (1.9); emails with Sidley team re revisions to same (.2)	2.10
04/15/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.10
04/15/21	MA Clemente	Assess oversight board membership issues	1.00
04/15/21	EA Bromagen	Revisions to Committee response to motions for stay (1.2); emails with Sidley team re same (.2)	1.40
04/16/21	MA Clemente	Emails with A. Russell re: oversight board composition (.3); analysis of oversight board structure issues (.9); analysis of financing structure (.7)	1.90
04/16/21	EA Bromagen	Review of materials prepared by Debtor re plan effectiveness (.2); further revisions to Committee objection to stay of plan (.8); finalize same and emails with J. Hoffman re filing of same (.3); emails with G. Demo re filing of same (.1); emails with Sidley team re additional filings re direct appeal with the Fifth Circuit (.1)	1.50
04/19/21	MA Clemente	Assess issues regarding resignation of ACIS	.40
04/21/21	EA Bromagen	Review of claimant trust agreement and consideration of compensation arrangements, emails with M. Clemente, C. Rognes and A. Russell re same (.3); emails with A. Artwala re post effective date compensation arrangements (.2)	.50
04/21/21	MA Clemente	Review filed financing motion (.3); address issues regarding appointment of oversight board (.4)	.70
04/21/21	A Russell	Correspond with E. Bromagen and M. Clemente re Seery compensation, last proposal for consideration.	.30
04/22/21	EA Bromagen	Call with G. Demo re post effective date governance (.1); emails with M. Clemente re same (.1) emails with G. Demo re	.70

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		D&O insurance (.2); emails and calls with M. Flaharty re same (.3)	
04/22/21	MA Clemente	Analyze D&O emails with FTI (.4); email from E. Bromagen re: oversight board (.1); address issues regarding oversight board (.9)	1.40
04/23/21	MA Clemente	Call with J. Pomerantz re: appeal litigation (.3); address emails re: continuance of agreed upon stay (.3); analysis of litigation trust agreement and oversight board provisions (.7)	1.30
04/26/21	EA Bromagen	Emails with G. Demo re D&O insurance issue (.1); call with Committee and Board re effective date issues (.5); emails with Committee re Debtor request for payment of CEO bonus for plan effectiveness (.2); emails with A. Attarwala and E. Cheng re plan projections (.1)	.90
04/26/21	MA Clemente	Email with A. Russell, E. Bromagen and E. Cheng re: Seery comp (.1); review financing motion (.5); work on issues regarding control of related party note litigation (.7)	1.30
04/26/21	A Russell	Correspond with E. Bromagen, M. Clemente and Committee re follow up from Seery compensation request/proposal.	.30
04/27/21	EA Bromagen	Call with FTI and Sidley teams re D&O insurance issues (.5); review comments to Teneo engagement letter (.3); discuss Teneo engagement with M. Clemente (.4)	1.20
04/27/21	MA Clemente	Call with FTI re: D&O issues (.5); review plan re: estate claims (.4); analysis of D&O endorsement (.4); call with J. Pomerantz re: D&O issues (.4); work through control of related party notes litigation under provision of plan (.5); analysis of D&O issues in FTI/Alliant email (.6)	2.80
04/28/21	MA Clemente	Draft email to J. Pomerantz re: control of related party note litigation (.4); call with E. Bromagen re: plan provisions (.2)	.60
04/28/21	EA Bromagen	Call with M. Clemente to discuss notes litigation (.2); review of plan documents including emails with M. Clemente re same (.2)	.40
04/29/21	EA Bromagen	Emails with S. Advani re post effective trust agreements	.10
04/29/21	MA Clemente	Email with A. Russell re: trust interests (.1); review transferability of trust interests (.9); analysis of financing materials (1.1); address issues re: Seery comp proposal (.7)	2.80
04/30/21	A Russell	Correspond with Sidley and FTI teams re tax questions re claimant trust agreement and transferability of interests (.3); review materials regarding same (.1)	.40

SIDLEY AUSTIN LLP

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/30/21	EA Bromagen	Call with Latham and Sidley teams re trust interests (.3); review of trust documents (.2); emails with M. Clemente, A. Russell and G. Demo re same (.2)	.70
Task Subtotal			46.40
21 Tax			
04/29/21	ST Advani	Review team e-mail on liquidating trust questions	.20
04/29/21	A Russell	Correspond with M. Clemente, E. Bromagen, S. Advani and Latham re UBS tax questions re claimant trust agreement.	.30
04/30/21	ST Advani	Telephone conference with Latham tax regarding trust agreement (.3); prepare for same (.1)	.40
Task Subtotal			.90
24 Creditor Communications			
04/01/21	MA Clemente	Call with A. Clubok re: various issues (.4); update email to Committee (.2)	.60
04/01/21	A Russell	Correspond with E. Bromagen and creditor re case inquiry.	.20
04/05/21	EA Bromagen	Discuss plan with B. Oberg of Hain Capital	.40
04/09/21	MA Clemente	Call with M. Hankin re: various issues (.4); call with P. Daugherty re: various issues (.6)	1.00
04/12/21	MA Clemente	Call with M. Hankin and E. Bromagen re: oversight board issues (.3); correspond with E. Bromagen regarding same (.2)	.50
04/13/21	MA Clemente	Call with A. Clubok re: various issues	.30
04/14/21	MA Clemente	Call with J. Terry re: various issues	.60
04/15/21	MA Clemente	Call with J. Terry re: various issues (.5); call with M. Hankin re: various issues (.3)	.80
04/16/21	MA Clemente	Call with M. Hankin re: various issues	.30
04/19/21	MA Clemente	Email with Latham re: adversary proceeding (.1); read letter re: ACIS resignation (.2)	.30
04/21/21	MA Clemente	Detailed update email to Creditor Committee (.5); address emails from L&W (.3)	.80
04/23/21	MA Clemente	Call with P. Daugherty re: various issues	.50
04/26/21	MA Clemente	Call with M. Hankin re: various issues (.4); call with A. Clubok re: various issues (.4)	.80
04/27/21	MA Clemente	Call with M. Hankin re: various issues (.3); call with K. Posin and M. Hankin re: various issues (.8)	1.10
04/29/21	MA Clemente	Email with UBS re: trust interests	.10

SIDLEY AUSTIN LLP

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
04/30/21	MA Clemente	Call with M. Hankin re: resignation (.3); review resignation letter from E. Felton (.1); emails with Committee members re: resignation (.3)	.70
Task Subtotal			<u>9.00</u>
Total Hours for all Tasks			647.20

SIDLEY AUSTIN LLP

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

T A S K D E T A I L

Date	Name	Narrative	Hours
01 Asset Analysis and Recovery			
05/13/21	J Hoffman	Research re: 2004 exams (0.3); provide analysis of same to Sidley team (0.2)	.50
Task Subtotal			.50
05 Committee Meetings			
05/05/21	R Fink	Participate in and take minutes on weekly UCC call (.6); revise and synthesize minutes regarding same (.2)	.80
05/05/21	EA Bromagen	Weekly call with Committee and professionals re various issues	.60
05/05/21	T Nifong	Participate in weekly UCC call regarding various case issues	.60
05/05/21	J Hoffman	Participate on weekly committee call regarding various case issues	.60
05/05/21	MA Clemente	Participate in committee meeting regarding various case issues	.60
05/05/21	A Russell	Attend weekly Committee meeting.	.60
05/05/21	CM Rognes	Attend weekly UCC call regarding various case issues	.60
05/12/21	R Fink	Participate in and take minutes on weekly UCC call (.3); revise and synthesize minutes regarding same (.2)	.50
05/12/21	CM Rognes	Attend pre-UCC call with Sidley and FTI teams (0.3); attend UCC call regarding various case issues (0.3); review materials for same (0.3)	.90
05/12/21	J Hoffman	Participate on weekly committee call regarding various case issues	.30
05/12/21	MA Clemente	Participate in committee meeting regarding various case issues (.3); address follow-up issues for same (.4)	.70
05/12/21	A Russell	Attend Committee meeting regarding various case issues	.30
05/19/21	R Fink	Participate in and take minutes on weekly UCC call (.3); revise and synthesize minutes re- same (.1)	.40
05/19/21	T Nifong	Participate in Weekly Sidley/FTI UCC call regarding various case issues	.30
05/19/21	EA Bromagen	Call with Committee and advisors re various issues	.30
05/19/21	MA Clemente	Participate in committee meeting (.3); address follow-up tasks from meeting (.1)	.40
05/19/21	A Russell	Attend weekly Committee meeting.	.30

SIDLEY AUSTIN LLP

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/19/21	PH Montgomery	Attend weekly UCC meeting	.30
05/19/21	PP Reid	Participate in weekly committee call	.30
05/19/21	CM Rognes	Attend weekly UCC call regarding various case issues	.30
05/24/21	MA Clemente	Call with J. Moldovan re: various issues (.3); email to Committee re: subpoena (.1)	.40
05/26/21	MA Clemente	Participate in committee meeting regarding various case issues	.30
Task Subtotal			10.40
06 Business Operations			
05/21/21	MA Clemente	Call to P. Montgomery re: real estate transaction	.10
Task Subtotal			.10
07 Case Administration			
05/02/21	MA Clemente	Emails with E. Bromagen re: Seery comp (.2); email from J. Pomerantz re: Seery bonus (.1)	.30
05/03/21	DM Twomey	Review UCC resignation letter/emails (.20); phone call with M. Clemente re status update, strategic issues (.20)	.40
05/03/21	EA Bromagen	Weekly call with FTI and Sidley re various issues (.6); emails with P. Daugherty and C. Rognes re past transcripts (.1); emails with Latham and Meta-E re Debtor's motion for CEO Compensation (.1)	.80
05/03/21	MA Clemente	Team call with FTI re: various issues (.6); address committee composition issues (.3); call with D. Twomey regarding status and strategic issues (.2)	1.10
05/03/21	J Hoffman	Correspondence with clerk re: hearing dates (0.1); confer with Sidley team re: same (0.2)	.30
05/03/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues (.6); prepare for same (.1)	.70
05/04/21	EA Bromagen	Email to M. Clemente re agenda for Committee meeting	.20
05/04/21	MA Clemente	Emails with Sidley team re: discussion with M. Kirschner	.20
05/04/21	J Hoffman	Correspondence with clerk, Sidley team re: preliminary injunction hearing	.30
05/05/21	DJ Lutes	Emails with J. Hoffman regarding case administration tasks (.1); prepare materials for same (.2)	.30
05/05/21	EA Bromagen	Call with FTI and Sidley re various issues in advance of call with Committee (.2); call with G. Demo re various issues (.1)	.30
05/05/21	T Nifong	Participate in weekly pre UCC Sidley/FTI call regarding various case issues	.20

SIDLEY AUSTIN LLP

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/05/21	CM Rognes	Attend pre-UCC call with FTI and Sidley teams regarding various case issues	.20
05/05/21	J Hoffman	Correspondence with A. Russell re: UBS depositions (0.1); provide analysis of status conference for FTI team (0.3); correspondence with Debtor counsel re: status conference (0.1); update case calendar (0.1)	.60
05/05/21	MA Clemente	Team call with FTI and Sidley teams re: various issues (.2); prepare for committee call (1.1); email with J. Pomerantz re: Seery comp (.1); review committee bylaws in light of member resignation (.4); email with E. Bromagen re: member resignation (.1)	1.90
05/05/21	A Russell	Telephone conference with Sidley and FTI teams to coordinate and prepare for Committee meeting.	.20
05/06/21	EA Bromagen	Review docket and emails with G. Demo re hearing scheduling	.10
05/06/21	DM Twomey	Correspond with M. Clemente regarding status update	.20
05/06/21	J Hoffman	Research re: status conference (0.2); update case calendar (0.1); advise Committee members on hearing updates (0.1)	.40
05/06/21	MA Clemente	Call with J. Pomerantz re: various issues	.30
05/06/21	A Russell	Correspond with J. Hoffman re hearing scheduling updates.	.20
05/07/21	EA Bromagen	Emails with M. Clemente, Committee members re meeting with Committee/Board (.1); emails and call with G Demo re same (.1)	.20
05/07/21	DJ Lutes	Emails with Sidley team regarding agendas, hearings and filing status (.1); prepare electronic files for Sidley team (.3)	.40
05/07/21	MA Clemente	Emails with J. Pomerantz re: committee materials (.2); call with J. Pomerantz re: various issues (.4); emails with L. Lambert re: committee status (.2)	.80
05/07/21	A Russell	Correspond with E. Bromagen and M. Clemente re Debtor's motion to continue hearing on exit financing.	.20
05/08/21	J Hoffman	Update case calendar	.20
05/10/21	EA Bromagen	Weekly call with FTI and Sidley re various issues	.70
05/10/21	J Hoffman	Update case calendar (0.2); correspondence with A. Russell re: same (0.1)	.30
05/10/21	MA Clemente	Call with J. Pomerantz re: numerous issues (.3); team call with FTI re: various issues (.7); call with A. Russell re: various issues (.2)	1.20
05/10/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.70

SIDLEY AUSTIN LLP

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/11/21	DM Twomey	Correspond with M. Clemente regarding case update, financing and claims trade issues	.20
05/11/21	MA Clemente	Call with J. Pomerantz re: various issues (.4); call with J. Seery re: various issues (.2); address agenda for committee call (.3)	.90
05/11/21	J Hoffman	Update case calendar	.30
05/12/21	DJ Lutes	Review hearing calendars, agendas and updates for status and deadlines	.20
05/12/21	EA Bromagen	Call with FTI and Sidley teams re various issues (.3); discuss various issues with M. Clemente regarding same (.2)	.50
05/12/21	DM Twomey	Confer with M. Clemente regarding status update and UCC call	.20
05/12/21	MA Clemente	Call with FTI to prepare for committee meeting (.3); prepare for committee meeting (.9); call with D. Twomey regarding same (.2)	1.40
05/12/21	A Russell	Telephone conference with Sidley and FTI teams re preparation and coordination for Committee meeting.	.30
05/14/21	MA Clemente	Emails with L. Lambert re: committee composition	.20
05/14/21	J Hoffman	Finalize and file Teneo retention application (0.3); correspondence with H. Young re: pro hac requirements (0.2)	.50
05/17/21	J Hoffman	Prepare materials for M. Clemente for May 18th hearing (0.5); correspondence with debtor counsel re: hearing updates (0.1)	.60
05/17/21	MA Clemente	Team call with FTI re: various issues (.4); prepare for same (.1); review hearing agenda (.1); call with J. Pomerantz re: various issues (.3); address incoming team emails re: committee communication (.2); emails with E. Bromagen re: status on several issues (.2)	1.30
05/17/21	EA Bromagen	Weekly call with FTI and Sidley re various issues	.40
05/18/21	DJ Lutes	Research case docket for orders and pleadings (.1); prepare electronic files for Sidley team regarding same (.2)	.30
05/18/21	J Hoffman	Correspondence with FTI, Sidley teams re: hearing status (0.2); correspondence with Debtor, Sidley teams re: transcripts (0.1); calls, correspondence with court re: emergency motion (0.1)	.40
05/18/21	EA Bromagen	Emails with G. Demo re scheduling call re indemnity trust	.10
05/19/21	CM Rognes	Attend pre-UCC call with Sidley and FTI teams regarding various case issues	.30
05/19/21	DM Twomey	Phone conference with M. Clemente regarding update on current case issues	.20
05/19/21	J Hoffman	Draft and file notice of hearing for motion to stay (.4); review, file witness and exhibit list (.2); review service list and	1.00

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		questions from KCC team re: service for adversary (.2); correspondence with KCC team re: same (.2)	
05/19/21	EA Bromagen	Call with FTI and Sidley teams re various issues	.30
05/19/21	MA Clemente	Team call with FTI and Sidley teams regarding various case issues (.3); prepare for committee meeting (.8); call with D. Twomey regarding various case issues (.2)	1.30
05/19/21	A Russell	Telephone conference with Sidley and FTI teams to coordinate and prepare for Committee meeting.	.30
05/20/21	EA Bromagen	Discuss various issues with G. Demo (.1); discuss various issues with M. Clemente (.2)	.30
05/20/21	MA Clemente	Call with E. Bromagen re: various issues (.2); assess next steps regarding same (.1)	.30
05/21/21	DJ Lutes	Prepare electronic files for case administration and Sidley team updates	.30
05/21/21	J Hoffman	Complete transcript forms for multiple hearings	.20
05/21/21	MA Clemente	Call with J. Seery re: various issues	.50
05/24/21	DM Twomey	Correspond with M. Clemente regarding litigation trust issues, plan effectiveness issues (.20); review emails regarding same, case issues, discovery requests (.30)	.50
05/24/21	J Hoffman	Call to court re: reconsideration statement (0.1); confer with C. Rognes re: same (0.2); call with S. Palmer re: hearing transcripts (0.1); review COS for adversary (0.1); correspondence with KCC team re: same (0.1)	.60
05/24/21	MA Clemente	Team call with FTI re: various issues	.40
05/24/21	EA Bromagen	Call with FTI and Sidley teams re various issues	.30
05/24/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.30
05/26/21	MA Clemente	Prepare for committee call	.80
05/26/21	J Hoffman	Correspondence with Sidley team re: May 20 hearing (0.1); correspondence with clerk re: same (0.1); correspondence with clerk re: post-hearing memorandum (0.1)	.30
05/27/21	J Hoffman	Confer with Sidley team re: response to post-hearing memorandum	.10
05/28/21	MA Clemente	Email with J. Hoffman re: upcoming hearings (.1); review hearing dates and schedule (.3)	.40

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/28/21	J Hoffman	Research issues related to upcoming hearings (0.4); draft, revise outline of hearings (0.6); correspondence with Sidley team re: same (0.2)	1.20
Task Subtotal			31.60
08 Claims Administration and Objections			
05/03/21	EA Bromagen	Attend hearing on omnibus objection to claims (.5); prepare for same (.1)	.60
05/03/21	A Russell	Attend status hearing (in part) on Debtor's omnibus claim objection.	.30
05/05/21	EA Bromagen	Emails with E. Cheng re tax distribution claims	.10
05/18/21	A Russell	Review, analyze BHH response re Debtor's claim objection.	.30
Task Subtotal			1.30
09 Corporate Governance and Board Matters			
05/05/21	EA Bromagen	Call with Sidley, Pachulski, FTI, and Alliant re D&O coverage (.5); emails with M. Clemente re same (.2); emails with M. Flaharty re same (.1)	.80
05/06/21	EA Bromagen	Emails with M. Flaharty re update on D&O policies, review pricing re same	.20
Task Subtotal			1.00
11 Retention			
05/01/21	EA Bromagen	Revisions to Teneo engagement letter (.6); emails with A. Attarwala re same (.3)	.90
05/01/21	MA Clemente	Review further revised Teneo retention (.3); email from E. Bromagen re: revisions (.1); email from A. Artawalla re: rates (.1)	.50
05/04/21	EA Bromagen	Revise draft Teneo engagement letter (.4); emails with A. Attarwala and M. Kirschner re same (.3)	.70
05/04/21	MA Clemente	Email with J. Pomerantz re: Seery compensation (.1); address issues surrounding Seery compensation (.5)	.60
05/06/21	A Russell	Review, analyze correspondence with Committee members re Teneo retention.	.20
05/10/21	EA Bromagen	Emails with M. Kirchner, M. Clemente, J. Moldovan re Teneo retention	.20
05/11/21	EA Bromagen	Call with M. Kirschner re Teneo retention documents (.3); emails with M. Clemente and M. Kirschner re Teneo retention (.2); finalize engagement letter, emails with Meta-E, UBS, Teneo re signatures for same (.5); discuss Teneo engagement	3.80

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		and other issues with M. Clemente (.2); further discussion of same with M. Clemente (.1); revisions to Teneo retention application (1.5); emails with M. Clemente re same (.2); further revisions to Teneo retention application (.6); emails with M. Kirschner and Committee re same (.2)	
05/11/21	MA Clemente	Calls with E. Bromagen re: Kirschner retention (.3); revisions to retention application for M. Kirschner (.7); email with E. Bromagen re: same (.1)	1.10
05/13/21	J Hoffman	Review Teneo retention application (0.2); provide comments to E. Bromagen re: same (0.2)	.40
05/13/21	MA Clemente	Further review of Kirschner retention application (.4); address emails re: Kirschner retention app (.3); continued analysis of timing for Kirschner application (.4)	1.10
05/13/21	EA Bromagen	Revise and finalize Teneo retention application (.7); emails with P. McVoy, A. Attarwala re filing of same (.2); emails with J. Hoffman re filing of same (.1)	1.00
05/14/21	MA Clemente	Review further revised versions of Teneo retention (.4); address emails re: retention application (.3)	.70
05/14/21	J Hoffman	Revise Teneo retention application	.70
05/14/21	EA Bromagen	Emails with A. Attarwala and J. Hoffman re revisions to Teneo retention application	.20
05/28/21	J Hoffman	Correspondence with M. Clemente re: Kirschner retention application	.10
Task Subtotal			12.20
12 Fee Applications			
05/03/21	DJ Lutes	Emails with P. Foley regarding privilege review (.1); prepare monthly fee application materials for same (1.5); emails with S. Caputo regarding same (.1)	1.70
05/04/21	DJ Lutes	Prepare monthly fee application exhibits and materials for March and April (1.6); emails with M. Clemente regarding same (.1); emails with J. Hoffman regarding same (.1); emails with S. Caputo regarding same (.1); prepare electronic files for same (.2)	2.10
05/04/21	J Hoffman	Correspondence with D. Lutes re: fee applications	.20
05/05/21	J Hoffman	Correspondence with D. Lutes, FTI team re: fee applications	.20
05/06/21	DJ Lutes	Emails with J. Hoffman and E. Bromagen regarding FTI estimations (.2); analyze materials for same (.3); prepare April monthly materials (.2)	.70
05/06/21	J Hoffman	Correspondence with Sidley, FTI teams re: fee applications	.30

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/07/21	DJ Lutes	Prepare April monthly fee application materials and exhibits (.3); emails with J. Hoffman regarding same (.2)	.50
05/07/21	J Hoffman	Correspondence with D. Lutes re: monthly fee applications	.20
05/10/21	DJ Lutes	Prepare monthly fee application exhibits and materials (3.6); emails with J. Hoffman regarding same (.1); emails with M. Clemente regarding same (.3); emails with S. Caputo regarding same (.1)	4.10
05/10/21	MA Clemente	Review draft fee app (.5); emails with D. Lutes re: fee app (.3)	.80
05/11/21	DJ Lutes	Prepare monthly fee application exhibits and materials (1.6); emails to M. Clemente and J. Hoffman regarding same (.1)	1.70
05/11/21	J Hoffman	Draft and file CNO for interim fee application	.40
05/12/21	DJ Lutes	Prepare monthly fee application materials and exhibits (.5); emails with J. Hoffman and M. Clemente regarding same (.1)	.60
05/13/21	DJ Lutes	Prepare monthly fee application materials	.70
05/14/21	DJ Lutes	Prepare monthly fee application materials and exhibits	2.90
05/16/21	MA Clemente	Review Sidley fee app (.4); email with D. Lutes re: same (.1)	.50
05/16/21	J Hoffman	Review, finalize Sidley fee application (0.3); correspondence with Sidley team, Committee re: same (0.1)	.40
05/17/21	DJ Lutes	Prepare monthly fee application materials and exhibits (4.6); prepare interim fee application and assess deadlines (.3); prepare electronic files for Sidley team (.3)	5.20
05/17/21	J Hoffman	Draft, file CNO for Sidley fee app (0.3); revise orders for 4th, 5th interim fee apps (0.5); finalize and upload orders (0.3)	1.10
05/17/21	MA Clemente	Emails with J. Hoffman re: interim applications	.20
05/18/21	DJ Lutes	Prepare monthly fee application materials and exhibits (4.8); emails with S. Caputo regarding same (.2); prepare interim fee application and assess deadlines (.3)	5.30
05/18/21	J Hoffman	Finalize and file Sidley fee application	.20
05/19/21	DJ Lutes	Review monthly costs for compliance (.6); prepare monthly fee application materials and exhibits (4.5); emails with S. Caputo regarding same (.2)	5.30
05/20/21	DJ Lutes	Prepare monthly fee application materials and exhibits (2.9); emails with S. Caputo regarding same (.2); emails with J. Hoffman regarding monthly fee application issues (.1); analyze materials for same (.2)	3.40
05/20/21	J Hoffman	Multiple emails with E. Cheng, D. Lutes re: monthly fee application	.20

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/20/21	J Hoffman	Review Sidley monthly fee application	.20
05/21/21	DJ Lutes	Emails to P. Foley regarding privilege review (.1); prepare materials for same (.2); email to J. Hoffman regarding fee application issue (.1)	.40
05/24/21	J Hoffman	Draft and file CNO for fee application (0.3); review, revise FTI fee application (0.4)	.70
05/25/21	DJ Lutes	Prepare monthly fee application materials and exhibits	.50
05/26/21	DJ Lutes	Prepare monthly fee application and exhibits (.9); research cost materials and invoices for compliance (.8); email to P. Foley regarding privilege review (.1)	1.80
05/27/21	DJ Lutes	Emails with P. Foley regarding privilege review (.1); prepare electronic materials for same (.3); emails with S. Caputo regarding same (.2); prepare monthly fee application exhibits (.6)	1.20
05/27/21	J Hoffman	Finalize and file FTI fee application (0.2); draft and file CNOs (0.3)	.50
05/28/21	DJ Lutes	Prepare April fee application materials for M. Clemente review (.3); emails with M. Clemente regarding same (.2); prepare monthly fee application materials for May (.8)	1.30
05/28/21	MA Clemente	Review Sidley fee app (.6); emails with D. Lutes re: Sidley fee application (.2)	.80
05/28/21	J Hoffman	Review, revise Sidley fee application (0.2); correspondence with UCC re: same (0.1)	.30
Task Subtotal			46.60

14 Litigation

05/02/21	T Nifong	Draft UCC Response to CLO Holdco defendants motion to withdraw the reference	4.40
05/02/21	T Nifong	Call with M. Abdul-Jabbar re: drafting motion to withdraw the reference response brief	.30
05/02/21	CM Rognes	Draft responses re: CLO Holdco adversary proceeding motions to dismiss (0.4); research re: individual liability (3.5)	3.90
05/03/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.1); draft emails to E. Bromagen and FTI regarding same (.1)	.20
05/03/21	CM Rognes	Attend weekly professionals call with Sidley and FTI (0.6); research re: individual liability (2.8); draft responses re: CLO Holdco adversary proceeding motions to dismiss (2.1); draft outline re: individual liability (0.5); draft investigation workplan (1.0); correspond with P. Montgomery re: hearing for	7.70

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		preliminary injunction motion (0.1); correspond with P. Montgomery re: Rule 26(f) conference (0.3); correspond with opposing counsel re: Rule 26(f) conference (0.1); correspond with T. Nifong re: Hunter Mountain chronology (0.1); correspond with J. Hoffman re: notice of hearing; correspond with M. Abdul-Jabbar re: notice of hearing (0.1)	
05/03/21	M Abdul-Jabbar	Confer with T. Nifong in connection with committee's response to motion to withdraw	.20
05/03/21	MA Clemente	Participate in omnibus claims hearing (.5); emails with the Debtor re: meeting with M. Kirschner (.2); analysis of Hunter Mountain materials (.9)	1.60
05/03/21	J Hoffman	Attend (in part) telephonic status conference hearing (0.3); confer with T. Nifong re: motion to withdraw the reference response (0.3)	.60
05/03/21	PH Montgomery	Call with FTI and Sidley teams regarding outstanding tasks (.6); call with C. Rognes regarding adversary issues (.1); attend claim status hearing (.5); prepare for same (.7)	1.90
05/03/21	A Russell	Review, analyze Dondero trial brief re permanent injunction (.7); correspond with Sidley team re document production (.2).	.90
05/03/21	PG Foley	Review of March invoice including related correspondence with D. Lutes regarding same	2.80
05/03/21	T Nifong	Correspond with C. Rognes re: Hunter Mountain transaction chronology (.1); confer with M. Abdul-Jabbar re: draft response brief to CLO Holdco Motion to withdraw the reference (.2); draft response brief to CLO Holdco motion to withdraw the reference (6.2)	6.50
05/04/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.10
05/04/21	T Nifong	Draft UCC response brief to CLO Holdco MTWR	1.70
05/04/21	CM Rognes	Review notice of hearing re: motions to dismiss (0.2); correspond with P. Montgomery, FTI, and litigation trustee re: accounting databases (0.5); draft talking points re: Rule 26(f) conference (1.3); research re: conspiracy (0.4); correspond with opposing counsel re: Rule 26(f) conference (0.1); correspond with DSI re: data map (0.1); correspond with M. Abdul-Jabbar re: motions to dismiss (0.1); review clerk correspondence re: hearings for motions to withdraw the reference (0.1)	2.80
05/04/21	EA Bromagen	Review Debtor's objection to emergency motion by Dondero to stay injunction proceedings	.40
05/04/21	M Abdul-Jabbar	Correspond with T. Nifong regarding status of motion to withdraw the reference (.2); review draft motion (.3); research	3.20

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		case law regarding Holland factors (2.7)	
05/04/21	MA Clemente	Read objection to UBS settlement (.4); call with M. Kirschner re: various issues (.4); strategy regarding withdrawal of reference (.6)	1.40
05/04/21	PH Montgomery	Call with debtor regarding accounting issues (.4); communications with counsel regarding briefing issues (.2); communications with debtors counsel re documents (.3)	.90
05/04/21	A Russell	Review, analyze Dugaboy Trust's preliminary objection to UBS settlement motion (.2); review, analyze correspondence from the Court re Committee's adversary proceeding (.1); review, analyze Debtor's objections to motion to stay pending appeal and motion to withdraw reference (.4).	.70
05/05/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.10
05/05/21	M Abdul-Jabbar	Confer with T. Nifong relating to motion to withdraw the reference (.2); analyze bankruptcy jurisdiction statutes and core jurisdiction statutes (1.1); review case law in connection with same (2.2); review research in connection with motion to dismiss response (1.2)	4.70
05/05/21	CM Rognes	Review notice of hearing (0.1); draft talking points re: Rule 26(f) conference (0.3); draft response re: CLO Holdco adversary motions to dismiss (1.0); research re: conspiracy (4.7); research re: motion for leave to exceed brief page limits (0.2); correspond with P. Montgomery re: common interest agreement (0.1); correspond with M. Abdul-Jabbar re: motion to dismiss response strategy (0.7); correspond with J. Hoffman re: notice of hearing (0.1); correspond with T. Nifong re: motion to withdraw reference (0.2); correspond with P. Montgomery re: motion to withdraw reference hearing (0.1); correspond with J. Hoffman re: motion to dismiss response strategy (0.1)	7.60
05/05/21	J Hoffman	Analyze response to motion to withdraw the reference (0.2); calls with T. Nifong re: same (0.3); emails with T. Nifong re: same (0.2); research re: motion to withdraw response (0.9); provide analysis of same (0.5); review case law in support of MWR response (0.4); confer with C. Rognes re: motion for leave (0.1)	2.60
05/05/21	A Russell	Review, analyze Debtor's objection to NexPoint administrative claim.	.40
05/05/21	T Nifong	Draft UCC response to CLO Holdco motion to withdraw the reference (5.3); calls with J. Hoffman re: draft UCC response to CLO Holdco motion to withdraw the reference (.3); call with C. Rognes re: draft UCC response to CLO Holdco motion to	6.00

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		withdraw the reference (.2); call with M. Abdul-Jabbar re: draft UCC response to CLO Holdco motion to withdraw the reference (.2)	
05/06/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.10
05/06/21	T Nifong	Confer with J. Hoffman re: UCC response to CLO Holdco motion to withdraw the reference	.10
05/06/21	T Nifong	Draft Hunter Mountain transaction chronology	3.20
05/06/21	M Abdul-Jabbar	Review motions to dismiss filed by Dondero and CLO Holdco and confer with C. Rognes regarding opposition response	1.60
05/06/21	CM Rognes	Revise Rule 26(f) talking points (0.2); draft outlines and summaries re: claims and arguments (4.5); draft response re: CLO Holdco adversary motions to dismiss (0.4); confer with Teneo, Pachulski, Debtor, M. Clemente, and P. Montgomery (in part) re: onboarding and strategy (3.4); correspond with P. Montgomery re: Rule 26(f) conference (0.1); correspond with M. Abdul-Jabbar re: motion to dismiss response strategy (0.6); correspond with P. Montgomery re: scheduling order (0.1)	9.30
05/06/21	J Hoffman	Correspond with P. Montgomery, C. Rognes re: Rule 26(f) conference (0.2); discuss MWR response with T. Nifong (0.2)	.40
05/06/21	MA Clemente	Call with the Debtor and Kirschner regarding various issues (3.4); call with E. Bromagen re: various follow up on litigation call (.5); call with P. Montgomery re: various issues (.4); review structure chart and other litigation materials (.5)	4.80
05/06/21	PH Montgomery	Call with litigation trustee and debtor (in part) (2.0); call with M. Clemente re various litigation issues (.4); communications with C. Rognes regarding rule 26 conference (.2)	2.60
05/06/21	A Russell	Review, analyze response to Debtor's motion to disqualify Wick Phillips and related brief.	.60
05/07/21	CM Rognes	Draft responses re: CLO Holdco adversary proceeding motions to dismiss (3.5); research re: dismissal (0.9)	4.40
05/07/21	M Abdul-Jabbar	Analyze draft omnibus response to motions to dismiss (.8); correspond with C. Rognes relating to argument inserts re: same (.2); review draft omnibus rebuttal to motions to withdraw reference (1.6); confer with T. Nifong re: same (.1); revise draft omnibus rebuttal regarding maintaining the reference (1.9)	4.60
05/07/21	MA Clemente	Call with M. Kirschner re: various issues (.5); address timing of Kirschner retention (.3); review numerous UBS subpoenas (.3)	1.10
05/07/21	PH Montgomery	Review of materials related to potential claims	3.30

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/07/21	A Russell	Review notices of subpoenas and depositions re UBS adversary and correspond with J. Hoffman re same.	.20
05/07/21	T Nifong	Draft Hunter Mountain transaction chronology (.4); correspond with P. Montgomery, C. Rognes, and M. Abdul-Jabbar re: same (.1); research case law re: 544 (4.8); confer with M. Abdul-Jabbar re: 544 (.1)	5.40
05/08/21	CM Rognes	Research re: proof of claims	.20
05/08/21	M Abdul-Jabbar	Mark up defendants' motions to withdraw the reference and identify rebuttal points for omnibus opposition brief (1.8); revise arguments for rebuttal relating to factors concerning withdrawal (1.0); analyze caselaw relating to same (2.1); analyze bankruptcy docket relating to proofs of claim filed by defendants (.6); research Stern claims (.6)	6.10
05/09/21	T Nifong	Correspond with M. Abdul-Jabbar re: drafting UCC response to CLO Holdco motion to withdraw the reference	.10
05/09/21	T Nifong	Research case law re: proof of claim issues	1.30
05/09/21	M Abdul-Jabbar	Research case law relating to jurisdiction (2.3); revise opposition to motion to withdraw regarding jurisdictional analysis and Stern claims (1.9); draft related section inserts (2.1); emails T. Nifong regarding same (.1)	6.40
05/10/21	M Abdul-Jabbar	Conference with C. Rognes relating to draft opposition to motion to withdraw the reference (.3); discuss same with T. Nifong (.4); draft preliminary statement section insert for omnibus opposition brief regarding motion to withdraw the reference (4.3); revise draft inserts relating to factual background and analyze prior briefing re: same (1.1)	6.10
05/10/21	CM Rognes	Attend weekly professional call with Sidley and FTI (0.7); correspond with M. Abdul-Jabbar re: motion to dismiss strategy (0.3)	1.00
05/10/21	PP Reid	Participate in telephone conference with FTI and Sidley teams regarding outstanding tasks (.7); participate in court hearing on Dondero claim (1.7); prepare for same (.2)	2.60
05/10/21	T Nifong	Analyze Dondero's motion to withdraw the reference in CLO Holdco adversary proceeding (.9); email to P. Montgomery, M. Abdul-Jabbar, and C. Rognes re: same (.2); draft UCC response to CLO Holdco transaction defendants motion to withdraw the reference (3.2); call with M. Abdul-Jabbar re: same (.4); correspond with P. Montgomery, C. Rognes re: Hunter Mountain transaction chronology (.2)	4.90
05/10/21	J Hoffman	Review motion to withdraw the reference (0.1); confer with T. Nifong, C. Rognes re: same (0.1); participate (in part) in telephonic hearing on motion to stay (1.5)	1.70

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/10/21	MA Clemente	Attend emergency hearing regarding injunction (1.7); call with P. Montgomery re: rule 2004 and related issues (.4); emails with M. Kirschner re: retention (.3)	2.40
05/10/21	PH Montgomery	Participate in hearing regarding injunction (1.7); call with FTI and Sidley teams regarding outstanding tasks (.7); call with M. Clemente regarding litigation issues (.4); review and revise chronology (2.2)	5.00
05/10/21	A Russell	Review, analyze Dondero motion to withdraw reference in CLOH adversary (.3); correspond with Sidley teams re strategy issues re UBS adversary (.2); review, analyze Dondero objection to Debtor's witness/exhibit list re permanent injunction trial (.1); attend (in part) emergency hearing on Dondero motion to continue permanent injunction trial (1.5).	2.10
05/11/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.30
05/11/21	CM Rognes	Draft list of parties re: discovery (0.6); draft potential topics re: discovery (2.0)	2.60
05/11/21	T Nifong	Correspond with C. Rognes re: 2004 examinations (.1); analyze discovery issues (.8); correspond with M. Abdul-Jabbar re: drafting opposition to CLO Holdco motion to withdraw the reference (.2); correspondence with P. Montgomery, M. Abdul-Jabbar, and C. Rognes re: same (.2)	1.30
05/11/21	MA Clemente	Call with M. Kirschner re: various issues (.4); call with P. Montgomery and Pachulski re: litigation issues (.4); call with P. Montgomery re: strategy (.3); email with M. Kirschner re: strategy (.1); analysis of rule 2004 issues (.6); brief review of UBS deposition transcripts (.5)	2.30
05/11/21	M Abdul-Jabbar	Complete initial draft of motion to withdraw the reference and submit to P. Montgomery for review (1.0); review proposed list of individuals and entities pertinent to 2004 examination (.4)	1.40
05/11/21	A Russell	Review, analyze transcripts from UBS depositions (.7); correspond with Sidley team re same (.1); correspond with Pachulski re Seery deposition (.1).	.90
05/11/21	PH Montgomery	Call with M. Clemente regarding discovery issues and strategies (.3); call with Pachulski and M. Clemente regarding litigation issues (.4); communications with team regarding discovery issues (.2); review of adversary issues (.3)	1.20
05/11/21	NP Cade	Communications with T. Nifong regarding litigation project (.2); pull cases cited in opposition to motion to withdraw the reference (.9); prepare case binder of same with index (1.1)	2.20
05/12/21	T Nifong	Call with P. Montgomery, M. Abdul-Jabbar, and C. Rognes re: responding to motion to withdraw the reference, and motion to	2.90

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		dismiss (.6); correspond with P. Montgomery, M. Abdul-Jabbar, and C. Rognes re: Section 2004 requests for production (.3); participate in weekly Sidley/FTI re-UCC call (.3); participate in weekly UCC call regarding various case issues (.3); research case law re: jury demand (1.4)	
05/12/21	EA Bromagen	Call with Committee and advisors re various issues (.3); prepare for same (.1)	.40
05/12/21	EA Bromagen	Discuss UCC litigation standing issues with C. Rognes (.1); review DAF/CLO Holdco motion to reconsider prior orders (.3); review Debtor's objection to same (.4)	.80
05/12/21	CM Rognes	Correspond with P. Montgomery, M. Clemente, and Teneo re: discovery (0.5); draft motion for leave to exceed page limit (0.7); confer with P. Montgomery, M. Abdul-Jabbar, and T. Nifong re: motion to dismiss strategy (0.6); correspond with M. Abdul-Jabbar re: motion to dismiss strategy (0.1); correspond with opposing counsel re: page limit (0.1); correspond with E. Bromagen re: standing (0.1); correspond with P. Montgomery re: standing (0.1)	2.20
05/12/21	J Hoffman	Research re: order granting leave to appeal	.20
05/12/21	MA Clemente	Call with M. Kirschner and P. Montgomery re: rule 2004 (1.0); analysis of 2004 strategy (.7); read reconsideration papers (.6); assess potential responses (.6)	2.90
05/12/21	PH Montgomery	Call with C. Rognes, T. Nifong and M. Abdul-Jabbar regarding CLO Holdco adversary (.6); attend UCC meeting regarding various case issues (.3); call with FTI and Sidley teams regarding UCC meeting (.3); call with litigation trustee regarding various issues (.3); communications with C. Rognes and M. Abdul-Jabbar re 2004 discovery (.3)	1.80
05/12/21	PP Reid	Participate in professionals call with FTI and Sidley teams for committee call (.3); participate in committee call regarding various case issues (.3); prepare for same (.2)	.80
05/12/21	M Abdul-Jabbar	Revise 2004 examination topics list, list of identified individual entities and select documents regarding same while mostly on call with Sidley team	.70
05/12/21	A Russell	Correspond with E. Bromagen and M. Clemente re response to motion to reconsider motion to appoint J. Seery as CEO (.3); review, analyze Debtor's draft objection to same (.6); review, analyze Dugaboy Trust's supplemental objection to UBS settlement (.4); review, analyze Dondero objection to UBS settlement (.2); review, analyze Fifth Circuit order certifying direct appeal of confirmation order (.1); correspond with J. Hoffman re same (.1).	1.70
05/13/21	CM Rognes	Draft motion for leave to exceed page limit (0.5); draft	1.50

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		proposed order re: motion for leave (0.2); review rule 2004 case (0.3); correspond with J. Hoffman re: motion to exceed page limits (0.1); correspond with P. Montgomery re: motion to exceed page limits (0.1); review documents re: CLO Holdco (0.2); correspond with P. Montgomery re: CLO Holdco documents (0.1)	
05/13/21	J Hoffman	Confer with A. Russell re: adversary depositions	.10
05/13/21	MA Clemente	Prepare 2004 strategy (.8) analysis of 2004 precedent (.6); address numerous questions from M. Kirschner (.4)	1.80
05/13/21	PH Montgomery	Review and revise draft motion to file brief in excess of page limits including related communications with Sidley team regarding same (.5); communications with Sidley team re discovery issues (.5)	1.00
05/13/21	A Russell	Review, comment on joinder to Debtor's objection to motion to reconsider CEO motion (.2); correspond with Sidley team re same (.1).	.30
05/13/21	EA Bromagen	Review Debtor's opposition to review of prior orders and draft Committee joinder to same (.8); revisions to same (.2); emails with A. Russell, M. Clemente, and J. Hoffman re filing same (.2)	1.20
05/13/21	T Nifong	Email to C. Rognes re: documents necessary for motion to withdraw the reference response appendix (.1); draft research email to P. Montgomery, C. Rognes, and M. Abdul-Jabbar re: research of case law re: CLO Holdco litigation issue (.3); research case law re: same (1.4)	1.80
05/14/21	CM Rognes	Review local rules re: Rule 2004 motions (0.3); correspond with Teneo, M. Clemente, and P. Montgomery re: Rule 2004 (0.7); correspond with P. Montgomery re: stay (0.1); draft response re: CLO Holdco adversary proceeding motions to dismiss (1.1); research re: stay (0.2); correspond with P. Montgomery re: litigation task list (0.2); correspond with J. Hoffman re: stay (0.2)	2.80
05/14/21	R Fink	Revise joinder to debtors' response regarding Seery retention	.10
05/14/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.30
05/14/21	MA Clemente	Read 2004 materials (.9); call with P. Montgomery re: Seery deposition (.3); call with M. Kirschner, P. Montgomery and C. Rognes re: 2004 (.7); prepare for call with Kirschner (.5); review joinder re: motion to reconsider (.1); emails with team re: joinder (.3); read debtor response to motion to reconsider (.8); beginning reading responses re: order to show cause (.9); analysis of Hunter Mountain materials including timeline (1.1)	5.60

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/14/21	PP Reid	Participate in deposition of J. Seery (in part)	1.30
05/14/21	J Hoffman	Research re: scope of discovery mechanisms (1.0); draft analysis of same for Sidley team (0.5); call with C. Rognes re: adjournment of proceedings (0.2); research re: NDTX discovery motions (0.7); revise, finalize joinder to Seery motion (0.3)	2.70
05/14/21	A Russell	Observe deposition of J. Seery re UBS settlement (1.4); prepare materials for same (.6); correspond with P. Montgomery re same (.1).	2.10
05/14/21	PH Montgomery	Attend Seery deposition (1.4); call re discovery with litigation trustee M. Clemente, and C. Rognes (.7); call with M. Clemente re Seery deposition (.3); call with C. Rognes regarding litigation task list (.2); communications with team re litigation trustee materials (.4)	3.00
05/14/21	T Nifong	Draft response to CLO Holdco motion to withdraw the reference	.60
05/14/21	T Nifong	Correspond with C. Rognes re: documents to support background of opposition to CLO Holdco motion to withdraw the reference	.10
05/14/21	NP Cade	Communication with J. Hoffman regarding joinder (.1); prepare materials for and efile joinder to debtor objection to reconsideration motion (.6)	.70
05/14/21	EA Bromagen	Emails with C. Rognes re example 2004 motions and review of same	.30
05/15/21	CM Rognes	Revise response re: CLO Holdco adversary proceeding motion to dismiss (1.0); research re: conspiracy (1.0); research re: stay (1.6)	3.60
05/15/21	M Abdul-Jabbar	Analyze defendants' motions to dismiss in connection with drafting omnibus opposition brief inserts rebutting specific claims and alleged defenses (3.1); draft rebuttal arguments (4.2); research case law in connection with same (3.5)	10.80
05/16/21	M Abdul-Jabbar	Complete initial draft of omnibus opposition brief, responding to specific allegations and defenses raised by Dondero, Scott, CLO Holdco, HDF, Get Good and Dugaboy's motions to dismiss (2.1); draft preliminary statement and factual background sections re: same (1.8); revise draft inserts (.7); revise rebuttal arguments (0.7)	5.30
05/16/21	CM Rognes	Research re: stay (1.3); draft motion re: stay (2.0); revise motion for leave to exceed page limit (0.1); review omnibus response re: CLO Holdco adversary proceeding motions to dismiss (0.1); revise omnibus response re: CLO Holdco adversary proceeding motions to dismiss (0.3); correspond with	3.90

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		M. Abdul-Jabbar re: omnibus response strategy (0.1)	
05/16/21	MA Clemente	Email from M. Kirschner re: 2004 (.1); review materials attached to M. Kirschner email (.3); strategy re: 2004 exams (.4)	.80
05/16/21	T Nifong	Draft UCC response to CLO Holdco motion to withdraw the reference	3.40
05/17/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); emails to E. Bromagen and FTI regarding same (.1)	.30
05/17/21	CM Rognes	Draft motion to stay (1.4); draft motion to exceed page limit (0.2); attend weekly professional call with FTI and Sidley teams regarding various case issues (0.4); draft responses to CLO Holdco adversary proceeding motions to dismiss (2.0); draft expedited hearing motion (1.1); review documents (0.1); research re: waiver (0.5); research re: information and belief (1.3); correspond with P. Montgomery re: motion to stay (0.2); draft order re: page limit (0.2); correspond with T. Nifong re: motion to withdraw the reference (0.2); correspond with M. Abdul-Jabbar re: motion to dismiss response strategy (0.4); draft agenda re: litigation update call (0.1); correspond with J. Hoffman re: Rule 2004 (0.1); correspond with M. Abdul-Jabbar re: motion to stay (0.1); correspond with M. Clemente and P. Montgomery re: Rule 2004 (0.1); correspond with opposing counsel re: requested stay (0.1); correspond with Debtor's counsel re: stay (0.1); correspond with P. Montgomery re: miscellaneous discovery (0.4)	9.00
05/17/21	J Hoffman	Correspondence with C. Rognes re: discovery motion research	.20
05/17/21	M Abdul-Jabbar	Prepare omnibus response to motions to dismiss (.7); correspond with C. Rognes re: same (.4); call with T. Nifong re: same (.4); draft omnibus response to motions to withdraw the reference (.7)	2.20
05/17/21	MA Clemente	Revisions to extension motion (.5); emails with litigation team re: timing (.1); analysis of appellate timing in 5th Circuit (.4); strategy regarding 2004 (.8); review case law re: 2004 (.8); review Wick Philips and related pleadings (.4); address issues re: timing of Effective Date (.5)	3.50
05/17/21	C Clark	Assemble and electronically file motion for leave to exceed page limits (.5); upload order per same (.1)	.60
05/17/21	PP Reid	Participate in call with FTI and Sidley teams regarding various case issues (.4); prepare for same (.1)	.50
05/17/21	PH Montgomery	Call with Sidley and FTI teams regarding various case issues (.4); call with C. Rognes regarding discovery issues (.4); review and revise motion to stay (.7); review and revise	2.30

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		correspondence regarding motion (.3); communications with lit advisor regarding stay (.5)	
05/17/21	T Nifong	Confer with M. Wolf re: pulling documents for UCC response to CLO Holdco motion to withdraw the reference (.1); correspond with C. Rognes regarding UCC response to CLO Holdco motion to withdraw the reference (.1); call with M. Abdul-Jabbar regarding UCC response to CLO Holdco motion to withdraw the reference (.4); draft UCC response to CLO Holdco Motion to withdraw the reference (2.6)	3.20
05/18/21	CM Rognes	Call with M. Clemente, P. Montgomery, and Teneo re: motion to stay (0.4); draft declaration in support of motion to stay (1.2); draft motion to stay (1.0); draft motion for expedited hearing (0.9); correspond with vendor re: credentials (0.1); correspond with P. Montgomery re: motion to stay (0.2); correspond with M. Abdul-Jabbar re: motion to dismiss response strategy (0.2); correspond with P. Montgomery re: motion for expedited hearing (0.2); correspond with J. Hoffman re: motion to stay (0.2); draft correspondence to client re: motion to stay (0.2); correspond with Teneo re: motion to stay (0.2)	4.80
05/18/21	J Hoffman	Attend telephonic hearing for adversary trial (0.5); review, revise motion to stay, ancillary pleadings (0.4); review, revise motion to expedite (0.3); multiple calls, correspondence with Sidley team re: emergency motion (0.6)	1.80
05/18/21	M Abdul-Jabbar	Revise omnibus opposition brief regarding motions to dismiss and analyze Dondero, CLO Holdco, and other Defendants' arguments in support of dismissal (4.1); call with T. Nifong regarding same (.3)	4.40
05/18/21	MA Clemente	Participate in contempt hearing (.5); call with M. Kirschner and Sidley team re: strategy (.4); call with J. Pomerantz re: appeals and related issues (.4); review revised motion for delay (.3); work on 2004 strategy (.6); analysis of Hunter Mountain materials (1.1)	3.30
05/18/21	PP Reid	Participate in adversary hearing (.5); prepare for same (.6); emails with Sidley team regarding hearing (.2); emails with Sidley team regarding motion to stay adversary proceeding (.2)	1.50
05/18/21	EA Bromagen	Attend adversary hearing	.50
05/18/21	PH Montgomery	Call with Sidley team and Teneo regarding stay motion (.4); attend adversary hearing (.5); review and revise motion to expedite and motion to stay (2.6); coordinate filing issues with Sidley team (.4)	3.90
05/18/21	A Russell	Attend hearing for adversary proceeding re permanent injunction against J. Dondero (.5); review, analyze new	1.20

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		NexPoint lawsuit against Acis and J. Terry and correspond re same (.3); review, analyze Debtor's response to motion to compel J. Seery testimony (.2); review, analyze order resolving Dondero adversary (.1); review update re Kirschner request for motion to stay CLO adversary (.1)	
05/18/21	T Nifong	Call with M. Abdul-Jabbar re: UCC opposition to motion to withdraw the reference (.3); research case law re: jurisdiction (1.6); draft UCC opposition to motion to withdraw the reference (1.5)	3.40
05/19/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.30
05/19/21	CM Rognes	Revise motion to expedite order (0.2); correspond with Teneo and P. Montgomery regarding discovery (0.6); correspond with P. Montgomery and litigation advisor regarding motion to stay hearing preparation (0.4); draft witness list (0.2); review CLO Holdco's objection to motion to stay (0.4); correspond with T. Nifong regarding motion to stay hearing preparation (0.2); correspond with M. Abdul-Jabbar regarding motion to dismiss response strategy (0.1); correspond with litigation advisor regarding motion to stay (0.2); correspond with J. Hoffman regarding notice of hearing and emergency setting (0.2); correspond with P. Montgomery regarding motion to stay hearing (0.2); correspond with clerk re: emergency order (0.1); strategize with P. Montgomery re: motion to stay hearing preparation (2.0); draft oral argument re: motion to stay hearing (5.0)	9.80
05/19/21	M Abdul-Jabbar	Review research relating to Texas law and apply to Dugaboy motion to dismiss arguments (1.2); correspond with T. Nifong re: same (.3); revise draft omnibus opposition to motions to dismiss and finalize for filing (1.8); review and finalize omnibus draft rebuttal to motions to withdraw the reference (1.7); review cited exhibits for appendix in connection with same (1.3)	6.30
05/19/21	NP Cade	Correspond with C. Rognes regarding order (.1); re-upload proposed order per Clerk's request (.1)	.20
05/19/21	PP Reid	Participate in professionals call with FTI and Sidley teams regarding various case issues (.3); prepare for same (.1); emails with Sidley team regarding motion to stay hearing (.3)	.70
05/19/21	J Hoffman	Call with P. Montgomery, C. Rognes re: hearing prep (.4); research re: Committee standing post-effective date (.4); draft analysis of same for P. Montgomery (.1); multiple calls, emails with Sidley team re: motion to stay and related hearing prep (.8); prepare for hearing on emergency motion (.7)	2.40
05/19/21	EA Bromagen	Review of Debtor objection to motion to compel compliance	.80

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		with code (.6); emails with A. Russell and M. Clemente re same (.2)	
05/19/21	MA Clemente	Call with P. Montgomery re: strategy (.3); call with P. Montgomery re: litigation issues (.5); work on materials responsive to M. Kirschner requests (2.0)	2.80
05/19/21	PH Montgomery	Call with FTI and Sidley teams regarding UCC meeting (.3); prepare for FTI call (.3); call with litigation advisor regarding document data (1.1); call with M. Clemente regarding strategy (.3); call with M. Clemente regarding litigation issues (.5); prepare for hearing on motion to stay (4.3); review and revise exhibit and witness list (.5); review cases regarding response brief (.9)	8.20
05/19/21	A Russell	Review, analyze UBS deposition transcripts.	.60
05/19/21	T Nifong	Analyze CLO Holdco opposition to emergency hearing on staying adversary proceeding (.2); prepare responses to CLO Holdco's opposition to motion to stay (1.2); correspond with P. Montgomery, M. Abdul-Jabbar, and C. Rognes re: responses to CLO Holdco's opposition to motion to stay (.1); prepare case summaries and distinctions for cases cited in CLO Holdco's opposition to motion to stay (1.8); correspond with P. Montgomery, M. Abdul-Jabbar, and C. Rognes re: case summaries and distinctions for cases cited in CLO Holdco's opposition to motion to stay (.1); call with M. Abdul-Jabbar re: researching claim for CLO Holdco AP motion to dismiss (.1); research case law re: claim for CLO Holdco AP motion to dismiss (2.2); call with M. Abdul-Jabbar re: drafting response to Dugaboy's motion to dismiss (.1); draft response to Dugaboy's Motion to Dismiss (1.2); correspond with M. Abdul-Jabbar and C. Rognes re: response to Dugaboy's motion to dismiss (.1); participate in weekly Sidley/FTI pre-UCC call regarding various case (.3)	7.40
05/20/21	R Fink	Attend virtually (in part) hearing re- motion to stay adversary proceeding	1.40
05/20/21	CM Rognes	Revise case distinctions regarding motion to stay hearing (0.1); preparation regarding motion to stay hearing (1.5); correspond with P. Montgomery and litigation advisor regarding motion to stay hearing (0.2); attend motion to stay adversary proceeding hearing (2.3); revise proposed order regarding stay (0.2); correspond with J. Hoffman regarding proposed order (0.1)	4.40
05/20/21	PP Reid	Participate in adversary hearing and motion to stay hearing (2.3); prepare for same (.2); emails with Sidley team regarding same (.2); participate in telephone conference with M. Kirschner regarding various issues (.5)	3.20
05/20/21	EA Bromagen	Attend hearing on various issues (2.3); revise Debtor's	3.20

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		objection to motion to compel (.5); emails with Committee, Pachulski re same (.3); emails with J. Hoffman re filing of joinder (.1)	
05/20/21	MA Clemente	Correspond with P. Montgomery re: litigation issues (.1); read joinder (.1); review witness and exhibit list (.2); participate in hearing regarding stay of CLOH adversary (2.3); read debtor's draft opposition to 2015.3 information (.7); emails with A. Russell re: 2015 (.3); review further revisions to debtor's draft (.3); emails with E. Bromagen re: 2015 (.3); email with E. Bromagen re: joinder (.1); review joinder (.1); email with J. Hoffman re: joinder (.1); call with P. Montgomery re: litigation strategy (.4); brief review of 5th Circuit appellate materials (.4)	5.40
05/20/21	PH Montgomery	Prepare for hearing on motion to stay (1.7); correspond with M. Clemente regarding litigation issues (.1); participate in hearing (2.3); communications with Debtor regarding data issues (.3); call with M. Clemente regarding strategy (.4)	4.80
05/20/21	A Russell	Attend hearing on motion to compel debtor testimony and Committee's motion to stay CLO adversary proceeding (2.3); review, analyze Debtor's draft objection to motion to compel 2015.3 (.4); correspond with M. Clemente, E. Bromagen and Pachulski re comments and joinder to same (.3)	3.00
05/20/21	T Nifong	Participate in emergency motion to stay hearing (2.3); prepare for hearing re: motion for emergency stay (1.4); prepare Hunter Mountain transaction chronology (3.2)	6.90
05/20/21	J Hoffman	Prepare materials for stay hearing (.5); correspond with C. Rognes re: orders for motion to stay (.1); participate in hearing on motion to stay, motion to compel (2.3); research re: motion to stay pending appeal (.2); draft, file joinder to objection to 2015.3 motion (.3); correspondence with Sidley team re: same (.1)	3.50
05/21/21	CM Rognes	Document review (0.3); correspond with P. Montgomery re: discovery (0.1); strategize re: discovery requests (0.2); correspond with J. Hoffman re: transcript (0.1); revise deadlines re: stay (0.1); correspond with M. Abdul-Jabbar re: post hearing memorandum (0.1); review, summarize post hearing memorandum (0.3); correspond with P. Montgomery re: post hearing memorandum (0.1); correspond with T. Nifong re: preservation order (0.1)	1.40
05/21/21	M Abdul-Jabbar	Review letter memorandum submitted to court by CLO Holdco's counsel (.6); correspond with litigation team regarding response strategy (.4); revise response letter to Dondero's counsel relating to compliance with Court's preservation order (.8); confer with T. Nifong re: same (.2)	2.00
05/21/21	J Hoffman	Attend hearing for the UBS settlement (5.8); finalize notes	6.20

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		from hearing for Sidley team (0.2); review post-hearing memorandum re: reconsideration (0.1); correspondence with C Rognes re: same (0.1)	
05/21/21	EA Bromagen	Attend UBS settlement hearing (in part)	.80
05/21/21	MA Clemente	Participate in UBS settlement hearing (5.8); review UBS settlement pleadings (.9); address error issues filed by Dondero re: stay of CLOH (.6); emails with litigation team re: errors from Dondero (.3)	7.60
05/21/21	PH Montgomery	Attend hearing regarding UBS settlement	5.80
05/21/21	A Russell	Attend hearing (in part) on approval of UBS settlement	5.00
05/21/21	T Nifong	Correspond with C. Rognes re: Dondero's compliance with motion to compel preservation (.1); correspond with P. Montgomery, C. Rognes, and M. Abdul-Jabbar re: Dondero's compliance with motion to compel preservation (.1); draft third letter to Bonds Ellis re: Dondero complying with preservation order (1.1); confer with M. Abdul-Jabbar re: draft third letter to Bonds Ellis re: Dondero complying with preservation order (.2); prepare Hunter Mountain transaction chronology (1.4)	2.90
05/22/21	MA Clemente	Read motion to amend answer in note suit (.5); review document request to committee (.3); call with M. Kirschner re: various litigation issues (.9); follow up call with P. Montgomery regarding same (.3)	2.00
05/23/21	CM Rognes	Draft response re: post hearing memorandum	1.60
05/24/21	M Abdul-Jabbar	Prepare Plan litigation strategy in connection with motion to stay adversary proceeding and upcoming hearing re: motions to withdraw reference	.40
05/24/21	PP Reid	Participate in telephone conference with FTI and Sidley teams regarding various issues (.3); participate in telephone conference with Sidley team regarding discovery requests on UCC (.4); review materials for same (.1)	.80
05/24/21	CM Rognes	Attend weekly professionals call with Sidley and FTI regarding various case issues (0.4); revise response to post hearing memorandum (0.4); review document requests (0.1); research re: document requests (1.2); review order granting stay of adversary proceeding (0.1); calculate, calendar stay deadlines (0.2); correspond with P. Montgomery re: litigation task list (0.2); correspond with P. Montgomery re: post hearing memorandum (0.1); correspond with J. Hoffman re: post hearing memorandum (0.1); correspond with P. Montgomery re: miscellaneous discovery (0.1); correspond with FTI re: miscellaneous discovery (0.1); call with M. Clemente, P. Reid, P. Montgomery, A. Russell, and E. Bromagen re: discovery requests (0.4)	3.40

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/24/21	MA Clemente	Team call re: document subpoena (.4); read subpoena (.3); conference with E. Bromagen re: subpoena (.1); call with M. Kirschner re: various issues (.3); work on litigation strategy outline (1.0); assess topics for 2004 strategy (1.5)	3.60
05/24/21	PH Montgomery	Attend (in part) J. Seery depo (1.5); call with Sidley team regarding discovery requests (.4); review subpoena and communications regarding same (.6)	2.50
05/24/21	EA Bromagen	Discuss document request from CPCM with M. Clemente (.1); review of document request (.1); call with Sidley team re response to same (.4); discuss document request with G. Demo (.1); emails to Sidley team re document request (.1); review of research re limitations on trust (.9)	1.70
05/24/21	A Russell	Observe deposition of J. Seery re promissory note adversary (2.5); telephone conference and correspond with Sidley team re discovery requests to Committee re objection to employee claims (.4).	2.90
05/25/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); email updates to E. Bromagen and FTI regarding same (.1)	.30
05/25/21	T Nifong	Attend hearing (in part) regarding motion to withdraw the reference for NexPoint/Dondero adversary proceeding	1.80
05/25/21	CM Rognes	Research re: discovery requests (1.0); correspond with P. Montgomery re: miscellaneous discovery (0.2); correspond with FTI re: miscellaneous discovery (0.2); attend hearing re: motions to withdraw the reference (in part) (0.3); correspond with DSI re: outstanding discovery requests (0.1); review outstanding discovery requests (0.3); research re: consent decree (0.2)	2.30
05/25/21	PP Reid	Emails with Sidley team regarding discovery issues (.2); participate in adversary proceeding (2.2); review materials received from DSI (1.0)	3.40
05/25/21	J Hoffman	Attend Highland hearing on motion to withdraw the reference	2.20
05/25/21	MA Clemente	Participate in reference withdrawal hearing (2.2); read new complaint filed against debtor (.4); work on litigation strategy (2.1)	4.70
05/25/21	PH Montgomery	Attend hearing regarding advisory proceedings (2.2); prepare litigation strategy (.7); correspondence to M. Clemente and P. Reid regarding case issues (.3); communications with C. Rognes regarding document production (.3); correspond with M. Clemente and P. Reid regarding 2004 subpoenas (.4); communications with J. Morris regarding documents (.2)	4.10
05/25/21	A Russell	Attend hearing on Dondero motions for withdrawal of	2.70

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		reference and to stay adversary proceeding. (2.2); review, analyze new complaint filed against Debtor in district court (.4); correspond with Sidley team re same (.1).	
05/25/21	EA Bromagen	Attend hearing re various issues	2.20
05/26/21	PP Reid	Review materials for M. Kirschner (1.9); emails regarding same (.3)	2.20
05/26/21	CM Rognes	Research re: document requests (1.7); correspond with P. Montgomery re: investigation (0.1); review motions to withdraw reference (0.2); correspond with P. Montgomery re: Hunter Mountain (0.2)	2.20
05/26/21	M Abdul-Jabbar	Analyze Hunter Mountain talking points	.30
05/26/21	MA Clemente	Analysis of potential claim cap issues (.4); prepare strategy for discussion with M. Kirschner (1.0); analysis of 2004 strategy (.9)	2.30
05/26/21	J Hoffman	Confer with Sidley team re: strategy for response to brief	.20
05/26/21	EA Bromagen	Review of case law on fraudulent transfer claims (.7); emails with M. Clemente re same (.2)	.90
05/27/21	CM Rognes	Correspond with DSI and P. Montgomery re: discovery (0.5); correspond with Debtor re: discovery (0.1); correspond with P. Montgomery re: priority custodians (0.1); review priority custodian list (0.1); strategize with P. Montgomery re: discovery (0.4)	1.20
05/27/21	PH Montgomery	Call with DSI regarding documents (.4); communications with M. Kirschner regarding adversary filing (.1); review data regarding cross-trading (1.2)	1.70
05/27/21	PG Foley	Review of April invoice, time detail for privilege	3.30
05/27/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
05/27/21	PP Reid	Emails with Sidley team regarding NexPoint adversary proceeding issues	.50
05/28/21	CM Rognes	Document review (0.2); correspond with FTI re: discovery (0.2); correspond with P. Montgomery and Pachulski re: discovery (0.5); correspond with P. Montgomery re: discovery (0.2); correspond with P. Montgomery re: investigation (0.1)	1.20
05/28/21	MA Clemente	Participate in Dondero deposition (4.0); read motion to compel filed by Dondero (.4)	4.40
05/28/21	PH Montgomery	Attend Dondero deposition (4.0); review materials for same (.5); research regarding cross-trading (2.1); participate in discovery call with Debtor (.5)	7.10

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/28/21	A Russell	Attend and observe deposition of J. Dondero.	3.90
05/28/21	PP Reid	Participate in portion of Dondero deposition	2.20
Task Subtotal			456.90
15 Plan and Disclosure Statement			
05/03/21	MA Clemente	Call with J. Seery re: various issues (.5); assess timing issues for effective date (.4); address need for financing (.6)	1.50
05/03/21	DM Twomey	Review emails re plan effectiveness and other current issues	.30
05/04/21	MA Clemente	Call with Debtor, Alliant and FTI re: D&O insurance (.9); call with M. Flaharty re: D&O insurance (.2); address strategy for D&O insurance (.6); review Oversight Board issues (.4)	2.10
05/05/21	EA Bromagen	Emails with M. Clemente re post effective date governance	.40
05/05/21	MA Clemente	Call with D. Pauker re: various issues (.6); call with M. Flaharty re: D&O issues (.3); emails with E. Bromagen re: D&O call (.3); review current contours of D&O proposal (.3); emails from FTI re: projections and various issues (.2)	1.70
05/06/21	EA Bromagen	Call with Sidley, Pachulski, Teneo, J. Seery, and creditors re plan overview and litigation trust next steps (3.4); call with M. Clemente re effective date issues (.5)	3.90
05/07/21	MA Clemente	Analysis of Effective Date timing (.3); analysis of Effective Date issues/strategy (1.3); emails with M. Flaharty re: D&O insurance (.2)	1.80
05/10/21	MA Clemente	Call with Seery and team regarding effective date (.7); work on potential indemnity trust solution for D&O (1.1); analysis of effective date issues (.7)	2.50
05/11/21	EA Bromagen	Review of proposed CEO bonus structure and comp analysis (.4); emails with M. Clemente and E. Cheng re same (.2); analyze post effective date compensations structures (.4); call to M. Clemente re summary of same (.2)	1.20
05/11/21	MA Clemente	Call with M. Goldman re: indemnity trust (.8); address queries re: compensation for post effective rolls (.3); call with E. Bromagen re: post effective date roles (.2); analysis of potential insurance solutions (.8)	2.10
05/11/21	MP Goldman	Conference call with Clemente and attention to underlying Claimant Trust and corresponding Indemnity Trust (.8); related analysis and documentation of approach (1.2)	2.00
05/12/21	MP Goldman	Evaluate structure of claimant trust and documentation approach (.8); analysis of documents related to same (.6)	1.40
05/13/21	S Lee	Call with M. Goldman to discuss background and structure of trust issues	1.00

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/13/21	MA Clemente	Analyze indemnity trust structure	.90
05/13/21	MP Goldman	Assess underlying documents and related potential indemnity trust structure	1.10
05/13/21	MP Goldman	Conference call with S. Lee regarding base documents of indemnity trust (1.0); prepare materials for same (.2)	1.20
05/14/21	MP Goldman	Review of background information and trust documentation	1.40
05/14/21	MP Goldman	Follow up correspondence with Sidley bankruptcy team regarding proposed Indemnity Trust structure	.40
05/17/21	S Lee	Review background documents in connection with indemnity trust (3.9); emails with M. Goldman and bankruptcy team regarding same (.2)	4.10
05/17/21	MP Goldman	Analyze documentation approach for Indemnity trust (.5); follow-up emails with S. Lee and bankruptcy team (.2)	.70
05/17/21	MA Clemente	Email with E. Bromagen re: indemnity trust (.1); follow up email from E. Bromagen re: indemnity trust (.1); assess structure of indemnity trust (.8)	1.00
05/17/21	EA Bromagen	Emails with G. Demo, M. Clemente, M. Goldman re call re indemnity trust	.20
05/18/21	S Lee	Review background documents and form of reinsurance comfort trust	2.40
05/18/21	MP Goldman	Review of underlying Estate documents for Claimant Trust and Indemnity Trust precedent	.60
05/18/21	MA Clemente	Call with J. Seery re: timing of effective date (.4); analyze structure of indemnity trust (1.0)	1.40
05/19/21	MP Goldman	Analyze claimant trust and related indemnity provisions	.50
05/19/21	EA Bromagen	Emails with G. Demo and M. Goldman re call re indemnity trust	.20
05/19/21	MA Clemente	Emails with E. Bromagen re: indemnity trust (.3); assess issues regarding exit financing/timing (.8)	1.10
05/20/21	MP Goldman	Review and analysis of indemnity and exculpation provisions of claimant trust and related priority issues	.60
05/20/21	MA Clemente	Continued analysis of viability of indemnity trust structure	.90
05/24/21	MP Goldman	Review of indemnity and exculpation provisions of claimant trust and related collateral trust approach	.60
05/25/21	MP Goldman	Review of underlying estate documents in connection with analysis of indemnity provisions of Claimant Trust (2.2); evaluate precedent collateral trust agreement for Indemnity Trust (.9)	3.10

SIDLEY AUSTIN LLP

Invoice Number: 41033191
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/25/21	EA Bromagen	Emails with Pachulski and Sidley teams re discussion re indemnity trust	.30
05/26/21	S Lee	Draft indemnity trust term sheet	.50
05/26/21	MP Goldman	Review of underlying Plan document and analysis of proposed indemnity trust (1.9); conference call with Claremont Trust trustee and representatives regarding potential structure and strategy for indemnity trust (1.2); follow-up conference with S. Lee regarding term sheet for indemnity trust (.4)	3.50
05/26/21	MA Clemente	Call with the Debtors re: indemnity trust (1.2); prep for call on indemnity trust (.5)	1.70
05/26/21	MA Clemente	Call with J. Seery re: various issues	.50
05/26/21	EA Bromagen	Emails with M. Goldman re indemnity trust (.2); call with Pachulski, Sidley, FTI and Latham re indemnity trust (1.2); emails with M. Clemente and E. Cheng re MGM potential sale (.2)	1.60
05/26/21	S Lee	Call with Claremont trustee, representatives and Sidley team regarding structure and strategy for indemnity trust (1.2); call with M. Goldman to discuss term sheet issues (.4);	1.60
05/27/21	MP Goldman	Assess structure of proposed indemnity trust and integration with claimant trust (.2); call with S. Lee regarding same (1.3)	1.50
05/27/21	MA Clemente	Prepare portions of indemnity trust structure	1.00
05/27/21	S Lee	Call with M. Goldman to discuss term sheet issues (1.3); draft indemnity trust term sheet (4.6)	5.90
05/28/21	S Lee	Draft indemnity trust term sheet	3.10
05/31/21	MP Goldman	Analyze structure and core terms of indemnity trust (.8); review of initial draft of term sheet and related features of claimant trust (1.1)	1.90
Task Subtotal			67.40

24 Creditor Communications

05/07/21	MA Clemente	Call to A. Clubok regarding various issues (.1); call with K. Posin re: update on various issues (.4); call with claim buyer regarding various issues (.4)	.90
05/11/21	MA Clemente	Call with J. Moldovan re: various issues (.4); address J. Moldovan questions (.2); email with J. Moldovan re: questions (.1)	.70
05/12/21	MA Clemente	Email with P. McVoy re: comp questions	.10
05/17/21	MA Clemente	Call with P. Daugherty re: various issues	.60
05/18/21	MA Clemente	Call with P. Daugherty re: various issues	.30

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
05/24/21	MA Clemente	Emails from P. Daugherty (.1); review materials from P. Daugherty (.5)	.60
05/25/21	MA Clemente	Call with claimholder re: various issues	.30
Task Subtotal			<u>3.50</u>
Total Hours for all Tasks			631.50

Exhibit D

Expense Detail

Invoice Number: 41019206
Official Committee of Unsecured

Restructuring

EXPENSE DETAIL

Date	Narrative	Amount
03/02/21	03/01/21-Duplicating Charges (Color) Time: 13:30:00	\$0.29
03/05/21	02/22/21-Lexis research service	199.50
03/05/21	E-Discovery Monthly Service Fee	2,308.00
03/05/21	01/22/2021 - TSG REPORTING INC - 2037514 - Certified Transcript of witness Michael Pugatch	1,451.60
03/06/21	02/24/21-Westlaw research service	55.01
03/06/21	02/16/21-Westlaw research service	187.04
03/06/21	02/16/21-Westlaw research service	119.03
03/06/21	02/24/21-Westlaw research service	31.20
03/06/21	02/24/21-Westlaw research service	176.40
03/09/21	02/24/2021-Postage	79.05
03/09/21	02/24/2021-Postage	8.45
03/09/21	02/26/2021-Postage	26.35
03/09/21	12/03/2019 - THE BUREAU OF NATIONAL AFFAIRS - 6888229870 - Bloomberg BNA charges 97661-30030-10922	3.00
03/10/21	Electronic Data Hosting	280.50
03/11/21	02/28/2021 - SECRETARY OF STATE OF TEXAS - 204000221 - Document retrieval	1.00
03/12/21	03/11/21-Duplicating Charges (Color) Time: 12:34:00	0.58
03/13/21	03/12/21-Duplicating Charges (Color) Time: 9:46:00	1.45
03/13/21	03/12/21-Duplicating Charges (Color) Time: 13:29:00	16.53
03/18/21	03/08/21-Westlaw research service	143.23
03/18/21	03/08/21-Westlaw research service	85.02
03/18/21	03/08/21-Westlaw research service	281.22
03/18/21	03/09/21-Westlaw research service	21.26
03/18/21	03/09/21-Westlaw research service	393.71
03/18/21	03/08/21-Westlaw research service	55.01
03/18/21	03/11/21-Westlaw research service	55.01
03/18/21	03/03/21-Westlaw research service	55.01

Invoice Number: 41019206
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
03/18/21	03/07/21-Westlaw research service	55.01
03/18/21	03/15/21-Westlaw research service	110.01
03/23/21	02/05/21-Telephone Charges Conference Call	0.02
03/23/21	02/15/21-Telephone Charges Conference Call	12.24
03/23/21	02/05/21-Telephone Charges Conference Call	0.19
03/24/21	03/21/2021 - ON TIME COURIERS INC - 320445 - Courier service from Dallas office to P. Montgomery regarding litigation and hearing preparation materials	35.75
03/24/21	03/21/2021 - ON TIME COURIERS INC - 320445 - Courier service from Dallas office to P. Reid regarding litigation and hearing preparation materials	31.35
Total		\$6,279.02

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

EXPENSE DETAIL

Date	Narrative	Amount
01/26/21	01/22/2021 - TSG REPORTING INC - 2037582 - CERTIFIED TRANSCRIPT	\$965.70
02/03/21	01/28/2021 - TSG REPORTING INC - 2037992 - CERTIFIED TRANSCRIPT OF JASON POST	917.20
02/05/21	02/02/2021 - TSG REPORTING INC - 2038454 - CERTIFIED TRANSCRIPT OF JAMES P. SEERY, JR.	1,852.80
02/05/21	01/29/2021 - TSG REPORTING INC - 2038462 - CERTIFIED TRANSCRIPT OF GRANT SCOTT	915.15
03/12/21	02/26/2021 - TSG REPORTING INC - 2040858 - CERTIFIED TRANSCRIPT OF DUSTIN NORRIS, JAMES DONDERO	1,041.00
03/12/21	02/26/2021 - TSG REPORTING INC - 2040974 - CERTIFIED TRANSCRIPT OF JAMES P. SEERY JR.	502.20
03/16/21	02/26/2021 - TSG REPORTING INC - 2041049 - CERTIFIED TRANSCRIPT OF ISAAC LEVENTON	1,799.80
04/01/21	Mar 28, 2021 - Juliana Hoffman - Transcript Fees - Transcript	2,015.50
04/06/21	04/05/21-Duplication charges Time: 9:52:00	0.30
04/06/21	04/05/21-Duplication charges Time: 11:10:00	0.90
04/06/21	04/05/21-Duplication charges Time: 11:05:00	123.75
04/06/21	04/05/21-Duplication charges Time: 11:04:00	22.95
04/06/21	04/05/21-Duplication charges Time: 11:30:00	1.50
04/06/21	04/05/21-Duplicating Charges (Color) Time: 11:01:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:26:00	0.58
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:17:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:22:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:27:00	0.58
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:45:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 11:47:00	26.10
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:18:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:20:00	1.16
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:21:00	1.74
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:23:00	0.29

Invoice Number: 41027663
 Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
04/06/21	04/05/21-Duplicating Charges (Color) Time: 12:07:00	0.87
04/06/21	04/05/21-Duplicating Charges (Color) Time: 11:57:00	26.10
04/06/21	04/05/21-Duplicating Charges (Color) Time: 12:03:00	1.16
04/06/21	04/05/21-Duplicating Charges (Color) Time: 13:20:00	26.10
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:37:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 12:58:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 11:45:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 11:56:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 12:01:00	0.58
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:19:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:24:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:27:00	0.87
04/06/21	04/05/21-Duplicating Charges (Color) Time: 9:56:00	0.58
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:19:00	1.45
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:23:00	2.03
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:24:00	1.16
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:25:00	0.87
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:18:00	1.45
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:48:00	1.16
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:47:00	2.03
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:50:00	0.58
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:47:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:48:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:53:00	0.58
04/06/21	04/05/21-Duplicating Charges (Color) Time: 11:03:00	0.58
04/06/21	04/05/21-Duplicating Charges (Color) Time: 11:04:00	0.87
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:49:00	0.87
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:51:00	0.87
04/06/21	04/05/21-Duplicating Charges (Color) Time: 10:46:00	0.29
04/06/21	04/05/21-Duplicating Charges (Color) Time: 11:02:00	0.58
04/06/21	04/05/21-Duplicating Charges (Color) Time: 11:05:00	2.61

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
04/06/21	03/10/21-Lexis research service	69.30
04/06/21	03/08/21-Lexis research service	138.60
04/06/21	03/22/21-Lexis research service	207.90
04/06/21	04/01/21 - DTI TOPCO INC - #67715690421 - Color Print (8x11 8x14)	72.26
04/06/21	04/04/2021 - ON TIME COURIERS INC - 320818 - Courier service from Dallas office includes two separate deliveries on 4/4/21 to P. Montgomery regarding litigation and hearing preparation materials	143.01
04/06/21	03/16/21-Westlaw research service	84.69
04/06/21	03/16/21-Westlaw research service	84.69
04/06/21	03/16/21-Westlaw research service	85.02
04/06/21	03/16/21-Westlaw research service	168.73
04/06/21	03/19/21-Westlaw research service	47.74
04/06/21	03/19/21-Westlaw research service	21.26
04/06/21	03/19/21-Westlaw research service	449.95
04/06/21	03/20/21-Westlaw research service	168.73
04/06/21	03/21/21-Westlaw research service	21.26
04/06/21	03/22/21-Westlaw research service	63.77
04/06/21	03/22/21-Westlaw research service	168.73
04/06/21	03/16/21-Westlaw research service	55.01
04/06/21	03/15/21-Westlaw research service	110.01
04/06/21	03/23/21-Westlaw research service	55.01
04/12/21	03/15/2021 - FIRST LEGAL INVESTIGATIONS - 55155 - International Process Serve to CHARTIABLE DAF HOLD LTD (2-23-21)	795.00
04/12/21	04/11/2021 - ON TIME COURIERS INC - 320965 - Two separate courier services between Sidley Dallas office to Bankruptcy Court on 4/5/21 regarding litigation and hearing materials for hearing	62.70
04/12/21	04/11/2021 - ON TIME COURIERS INC - 320965 - Courier service from Sidley office to Bankruptcy Court on 4/5/21 regarding additional litigation and hearing materials for hearing	31.35
04/13/21	04/06/21 - Epiq Connect - 060421.00165 Reprographics	884.49
04/13/21	04/06/21 - Epiq Connect - 060421.00160 Reprographics	118.91
04/13/21	04/06/21 - Epiq Connect - 060421.00127 Reprographics	432.14
04/13/21	E-Discovery Monthly Service Fee	2,308.00

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
04/13/21	Electronic Data Hosting	280.50
04/15/21	03/30/2021 - TSG REPORTING INC - 2043442 - CERTIFIED TRANSCRIPT OF JAMES SEERY JR	639.90
04/15/21	01/28/21-PACER INSBK	6.20
04/15/21	01/28/21-PACER NYSBK	0.10
04/15/21	01/28/21-PACER TXSBK	16.40
04/15/21	01/28/21-PACER NYSBK	10.30
04/15/21	02/11/21-PACER TXNDC	0.40
04/15/21	02/22/21-PACER TXNBK	0.70
04/15/21	02/23/21-PACER TXNBK	1.90
04/15/21	02/24/21-PACER TXNBK	2.00
04/15/21	02/25/21-PACER TXNBK	2.00
04/15/21	02/26/21-PACER TXNBK	2.00
04/15/21	02/27/21-PACER TXNBK	2.00
04/15/21	02/28/21-PACER TXNBK	2.00
04/15/21	03/01/21-PACER TXNBK	2.00
04/15/21	03/03/21-PACER TXNBK	2.10
04/15/21	03/04/21-PACER TXNBK	2.10
04/15/21	03/05/21-PACER TXNBK	2.10
04/15/21	03/06/21-PACER TXNBK	2.10
04/15/21	03/07/21-PACER TXNBK	2.10
04/15/21	03/08/21-PACER TXNBK	2.10
04/15/21	03/09/21-PACER TXNBK	2.10
04/15/21	03/10/21-PACER TXNBK	2.20
04/15/21	03/11/21-PACER TXNBK	2.20
04/15/21	03/12/21-PACER TXNBK	2.20
04/15/21	03/13/21-PACER TXNBK	2.20
04/15/21	03/14/21-PACER TXNBK	2.20
04/15/21	03/15/21-PACER TXNBK	2.20
04/15/21	03/16/21-PACER TXNBK	2.20
04/15/21	03/17/21-PACER TXNBK	2.20

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
04/15/21	03/18/21-PACER TXNBK	2.20
04/15/21	03/19/21-PACER TXNBK	2.20
04/15/21	03/20/21-PACER TXNBK	2.20
04/15/21	03/21/21-PACER TXNBK	2.20
04/15/21	03/22/21-PACER TXNBK	2.20
04/15/21	03/23/21-PACER TXNBK	2.20
04/15/21	03/24/21-PACER TXNBK	2.20
04/15/21	03/25/21-PACER TXNBK	2.30
04/15/21	03/26/21-PACER TXNBK	2.40
04/15/21	03/27/21-PACER TXNBK	2.40
04/15/21	03/28/21-PACER TXNBK	2.40
04/15/21	03/29/21-PACER TXNBK	2.40
04/15/21	03/30/21-PACER TXNBK	2.40
04/15/21	03/31/21-PACER TXNBK	2.40
04/15/21	01/01/21-PACER TXNBK	0.70
04/15/21	01/02/21-PACER TXNBK	0.70
04/15/21	01/03/21-PACER TXNBK	0.70
04/15/21	01/04/21-PACER TXNBK	0.70
04/15/21	01/05/21-PACER TXNBK	0.80
04/15/21	01/06/21-PACER TXNBK	0.80
04/15/21	01/07/21-PACER TXNBK	0.80
04/15/21	01/08/21-PACER TXNBK	1.70
04/15/21	01/09/21-PACER TXNBK	1.00
04/15/21	01/10/21-PACER TXNBK	1.00
04/15/21	01/11/21-PACER TXNBK	1.00
04/15/21	01/12/21-PACER TXNBK	1.10
04/15/21	01/13/21-PACER TXNBK	1.20
04/15/21	01/14/21-PACER TXNBK	1.20
04/15/21	01/15/21-PACER TXNBK	1.20
04/15/21	01/16/21-PACER TXNBK	1.20
04/15/21	01/17/21-PACER TXNBK	1.20

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
04/15/21	01/18/21-PACER TXNBK	1.20
04/15/21	01/19/21-PACER TXNBK	1.20
04/15/21	01/20/21-PACER TXNBK	1.20
04/15/21	01/21/21-PACER 05CA	0.80
04/15/21	01/21/21-PACER TXNBK	1.30
04/15/21	01/22/21-PACER TXNBK	1.30
04/15/21	01/23/21-PACER TXNBK	1.30
04/15/21	01/24/21-PACER TXNBK	1.30
04/15/21	01/25/21-PACER TXNBK	1.30
04/15/21	02/12/21-PACER TXNBK	1.70
04/15/21	02/13/21-PACER TXNBK	1.70
04/15/21	02/14/21-PACER TXNBK	1.70
04/15/21	02/15/21-PACER TXNBK	1.70
04/15/21	02/16/21-PACER TXNBK	1.70
04/15/21	02/17/21-PACER TXNBK	1.70
04/15/21	02/18/21-PACER TXNBK	1.80
04/15/21	02/19/21-PACER TXNBK	1.80
04/15/21	02/20/21-PACER TXNBK	1.80
04/15/21	02/21/21-PACER TXNBK	7.60
04/15/21	02/22/21-PACER TXNBK	2.40
04/15/21	01/26/21-PACER TXNBK	1.30
04/15/21	01/27/21-PACER TXNBK	1.30
04/15/21	01/28/21-PACER TXNBK	1.30
04/15/21	01/29/21-PACER TXNBK	3.20
04/15/21	01/30/21-PACER TXNBK	1.30
04/15/21	01/31/21-PACER TXNBK	1.30
04/15/21	02/01/21-PACER TXNBK	1.30
04/15/21	02/02/21-PACER TXNBK	1.40
04/15/21	02/03/21-PACER TXNBK	1.50
04/15/21	02/04/21-PACER TXNBK	1.50
04/15/21	02/05/21-PACER TXNBK	1.60

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
04/15/21	02/06/21-PACER TXNBK	1.60
04/15/21	02/07/21-PACER TXNBK	1.60
04/15/21	02/08/21-PACER TXNBK	1.60
04/15/21	02/09/21-PACER TXNBK	1.60
04/15/21	02/10/21-PACER TXNBK	1.60
04/15/21	02/11/21-PACER TXNBK	1.70
04/15/21	02/17/21-PACER TXNBK	2.00
04/17/21	04/15/21 - Epiq Connect - 150421.00565 Reprographics	190.61
04/20/21	04/13/21-Westlaw research service	337.80
04/20/21	04/03/21-Westlaw research service	55.01
04/20/21	04/03/21-Westlaw research service	55.01
04/20/21	04/04/21-Westlaw research service	220.02
04/20/21	04/09/21-Westlaw research service	46.69
04/20/21	04/09/21-Westlaw research service	55.01
04/20/21	04/04/21-Westlaw research service	220.02
04/20/21	04/12/21-Westlaw research service	55.01
04/20/21	04/13/21-Westlaw research service	55.01
04/21/21	04/18/2021 - ON TIME COURIERS INC - 321118 - Two separate courier service deliveries from Sidley Dallas office to P. Montgomery on 4/14/21 and 4/15/21 regarding litigation, appeal and hearing preparation materials	89.38
04/21/21	03/18/21-PACER TXNBK	0.70
04/21/21	03/11/21-PACER TXNBK	0.70
04/21/21	02/25/21-PACER TXNBK	1.20
04/21/21	01/06/21-PACER TXNBK	1.40
04/21/21	01/26/21-PACER 00PCL	0.10
04/21/21	01/26/21-PACER TXSBK	3.30
04/21/21	01/28/21-PACER 00PCL	0.30
04/21/21	01/28/21-PACER TXNBK	10.90
04/21/21	01/28/21-PACER TXNDC	0.90
04/21/21	02/08/21-PACER TXNBK	0.60
04/21/21	02/09/21-PACER 00PCL	5.70

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
04/21/21	02/09/21-PACER 05CA	4.60
04/21/21	02/09/21-PACER CANDC	3.00
04/21/21	02/09/21-PACER DEBK	1.30
04/21/21	02/09/21-PACER LAEBK	6.30
04/21/21	02/09/21-PACER LAWBK	0.40
04/21/21	02/09/21-PACER MSNBK	2.00
04/21/21	02/09/21-PACER TXEBK	4.70
04/21/21	02/09/21-PACER TXEDC	11.30
04/21/21	02/09/21-PACER TXNBK	3.30
04/21/21	02/09/21-PACER TXNDC	1.20
04/21/21	02/09/21-PACER TXSBK	24.80
04/21/21	02/09/21-PACER TXSDC	10.00
04/21/21	02/09/21-PACER TXWBK	3.00
04/21/21	02/10/21-PACER 00PCL	0.30
04/21/21	02/10/21-PACER TXNBK	2.90
04/21/21	03/01/21-PACER TXNBK	0.30
04/21/21	03/17/21-PACER 00PCL	0.50
04/21/21	03/17/21-PACER TXNBK	6.00
04/21/21	03/17/21-PACER TXNDC	3.50
04/21/21	03/31/21-PACER 00PCL	0.60
04/21/21	03/31/21-PACER TXNDC	1.30
04/21/21	03/09/21-PACER TXNBK	0.30
04/21/21	03/25/21-PACER TXNBK	3.90
04/21/21	03/08/21-PACER TXEDC	4.10
04/21/21	02/26/21-PACER TXNBK	5.00
04/21/21	02/28/21-PACER TXNBK	3.70
04/21/21	03/01/21-PACER 11CA	0.70
04/21/21	03/01/21-PACER TXNBK	0.20
04/21/21	01/13/21-PACER TXNBK	0.20
04/21/21	01/22/21-PACER TXNBK	0.80
04/21/21	02/22/21-PACER TXNBK	0.30

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
04/21/21	02/23/21-PACER TXNBK	4.10
04/21/21	02/23/21-PACER TXNDC	0.20
04/21/21	01/07/21-PACER TXNBK	12.40
04/21/21	01/11/21-PACER TXNBK	0.50
04/21/21	01/06/21-PACER TXNBK	14.90
04/21/21	03/15/21-PACER TXNBK	1.30
04/21/21	03/17/21-PACER TXNBK	0.20
04/21/21	03/02/21-PACER TXNDC	0.80
04/21/21	03/03/21-PACER TXNBK	0.90
04/21/21	03/04/21-PACER TXNBK	0.40
04/21/21	01/12/21-PACER TXNBK	2.20
04/21/21	01/05/21-PACER TXNBK	5.60
04/21/21	01/05/21-PACER TXNBK	0.10
04/21/21	01/05/21-PACER TXNDC	0.10
04/21/21	01/12/21-PACER TXNBK	1.20
04/21/21	01/08/21-PACER TXNBK	0.30
04/21/21	02/02/21-PACER TXNDC	0.10
04/21/21	02/03/21-PACER TXNDC	0.10
04/21/21	02/17/21-PACER TXNBK	4.30
04/21/21	03/25/21-PACER TXNBK	0.10
04/23/21	04/22/21-Duplicating Charges (Color) Time: 12:15:00	0.29
04/23/21	04/22/21-Duplicating Charges (Color) Time: 11:20:00	0.29
04/23/21	04/22/21-Duplicating Charges (Color) Time: 9:15:00	2.61
04/23/21	04/22/21-Duplicating Charges (Color) Time: 9:51:00	0.29
04/23/21	04/22/21-Duplicating Charges (Color) Time: 12:14:00	2.90
04/23/21	01/06/21-PACER TXNBK	6.80
04/23/21	01/07/21-PACER TXNBK	3.90
04/23/21	01/11/21-PACER TXNBK	40.30
04/23/21	01/12/21-PACER TXNBK	2.50
04/23/21	01/13/21-PACER TXNBK	11.60
04/23/21	01/14/21-PACER TXNBK	1.00

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
04/23/21	01/15/21-PACER TXNBK	4.00
04/23/21	01/19/21-PACER TXNBK	19.20
04/23/21	01/20/21-PACER TXNBK	6.00
04/23/21	01/21/21-PACER TXNBK	10.30
04/23/21	01/22/21-PACER TXNBK	11.60
04/23/21	01/25/21-PACER TXNBK	11.70
04/23/21	01/26/21-PACER TXNBK	7.10
04/23/21	01/27/21-PACER TXNBK	1.40
04/23/21	01/28/21-PACER TXNBK	0.70
04/23/21	02/01/21-PACER TXNBK	1.90
04/23/21	02/04/21-PACER TXNBK	5.00
04/23/21	02/05/21-PACER TXNBK	6.90
04/23/21	02/09/21-PACER TXNBK	2.80
04/23/21	02/10/21-PACER TXNBK	5.90
04/23/21	03/08/21-PACER TXNBK	6.20
04/23/21	03/17/21-PACER TXNBK	4.20
04/23/21	03/18/21-PACER TXNBK	5.60
04/23/21	03/19/21-PACER TXNBK	7.50
04/23/21	03/22/21-PACER TXNBK	1.40
04/23/21	03/23/21-PACER TXNBK	5.70
04/23/21	03/24/21-PACER TXNBK	9.60
04/23/21	03/25/21-PACER TXNBK	1.00
04/23/21	03/26/21-PACER TXNBK	2.00
04/26/21	03/15/2021 - FIRST LEGAL INVESTIGATIONS - 55153 - International Process Serve to CLO HOLDCO LTD (2-23-21)	795.00
04/26/21	03/15/2021 - FIRST LEGAL INVESTIGATIONS - 55154 - International Process Serve to Charitable Daf Fund LP (2-23-21)	795.00
04/27/21	Professional Services Consulting (Project Mgr) in connection with Litigation Support customized services	97.50
04/30/21	04/29/21-Duplicating Charges (Color) Time: 10:37:00	0.29
04/30/21	04/29/21-Duplicating Charges (Color) Time: 10:38:00	0.58

Invoice Number: 41027663
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
04/30/21	03/08/21-Telephone Charges Conference Call	0.19
		<hr/>
	Total	\$21,694.88

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

EXPENSE DETAIL

Date	Narrative	Amount
04/21/21	01/13/21-PACER TXNBK	\$0.40
04/21/21	02/24/21-PACER TXNBK	0.20
04/21/21	02/23/21-PACER TXNBK	0.20
04/21/21	01/07/21-PACER TXNBK	0.40
05/05/21	05/04/21-Duplicating Charges (Color) Time: 15:37:00	0.58
05/05/21	05/04/21-Duplicating Charges (Color) Time: 13:48:00	1.16
05/05/21	05/04/21-Duplicating Charges (Color) Time: 13:44:00	4.93
05/11/21	E-Discovery Monthly Service Fee	2,308.00
05/11/21	Electronic Data Hosting	285.00
05/11/21	04/26/21-Westlaw research service	55.01
05/11/21	04/20/21-Westlaw research service	55.01
05/11/21	04/23/21-Westlaw research service	46.69
05/11/21	04/23/21-Westlaw research service	55.01
05/11/21	04/27/21-Westlaw research service	55.01
05/11/21	04/28/21-Westlaw research service	165.02
05/11/21	04/16/21-Westlaw research service	110.01
05/11/21	04/19/21-Westlaw research service	330.03
05/11/21	04/22/21-Westlaw research service	55.01
05/11/21	04/28/21-Westlaw research service	330.03
05/11/21	04/29/21-Westlaw research service	440.05
05/12/21	05/11/21-Duplicating Charges (Color) Time: 16:35:00	1.16
05/12/21	05/11/21-Duplicating Charges (Color) Time: 16:24:00	1.16
05/12/21	05/11/21-Duplicating Charges (Color) Time: 16:45:00	0.58
05/12/21	04/15/21-Lexis research service	277.20
05/13/21	05/11/21 - Epiq Connect - 110521.00367 Reprographics	57.16
05/13/21	05/12/21-Duplicating Charges (Color) Time: 16:32:00	0.29
05/13/21	05/12/21-Duplicating Charges (Color) Time: 16:21:00	0.29
05/13/21	05/12/21-Duplicating Charges (Color) Time: 16:21:00	3.48

Invoice Number: 41033191
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
05/13/21	05/12/21-Duplicating Charges (Color) Time: 16:32:00	0.29
05/15/21	05/14/21-Duplicating Charges (Color) Time: 11:09:00	1.45
05/15/21	05/14/21-Duplicating Charges (Color) Time: 13:57:00	1.45
05/18/21	05/17/21-Duplicating Charges (Color) Time: 15:49:00	1.45
05/20/21	05/19/21-Duplicating Charges (Color) Time: 16:32:00	0.29
05/20/21	05/16/2021 - ON TIME COURIERS INC - 321839 - messenger delivery service to P. Montgomery residence from Sidley Dallas office regarding litigation and hearing preparation materials on 5/11/21	53.63
05/21/21	05/20/21-Duplicating Charges (Color) Time: 12:07:00	0.58
05/21/21	05/20/21-Duplicating Charges (Color) Time: 9:04:00	11.89
05/22/21	05/20/21 - Epiq Connect - 200521.00661 Reprographics	45.94
05/24/21	04/30/21 - LEXISNEXIS US USD - 3093244945 - SEARCH SERVICE	46.59
05/25/21	05/24/21-Duplicating Charges (Color) Time: 14:46:00	14.79
05/25/21	05/23/2021 - ON TIME COURIERS INC - 322005 - messenger delivery service to P. Reid residence from Sidley office regarding litigation preparation and hearing materials on 5/19/21	47.03
05/25/21	04/27/21-Telephone Charges Conference Call Customer: HMC5692 MATTHEW A CLEMENTE	3.23
05/26/21	05/25/21-Duplicating Charges (Color) Time: 16:09:00	8.70
05/27/21	May 24, 2021 - Juliana Hoffman - Transcript Fees - Transcript	75.60
05/28/21	05/27/21-Duplicating Charges (Color) Time: 12:43:00	5.51
05/28/21	Filing Fees 4/14/21 - WF4STATBRCA SERVICE FEE - CERTIFICATE OF GOOD STANDING	25.63
05/28/21	04/05/21-Telephone Charges Conference Call	0.76
Total		\$4,983.88

Exhibit E

Budget and Staffing Plan for the Interim Fee Period

**Budget by Matter Category for the Period from
March 1, 2021 to and Including May 31, 2021**

Matter Number	Project Category	Hours Budgeted	Total Fees Budgeted¹
001	Asset Analysis and Recovery	0 - 3	\$0.00 - \$2,460
002	Asset Disposition	0 - 3	\$0.00 - \$2,910
005	Committee Meetings	45 - 55	\$41,400 - \$50,600
006	Business Operations	5 - 10	\$6,350 - \$25,400
007	Case Administration	120 - 140	\$122,400 - \$142,800
008	Claims Administration and Objections	10 - 15	\$10,600 - \$15,900
009	Corporate Governance and Board Matters	30 - 35	\$30,900 - \$36,050
011	Retention	55 - 65	\$40,700 - \$48,100
012	Fee Applications	125 - 145	\$70,000 - \$81,200
013	Financing and Cash Collateral	5 - 10	\$6,050 - \$12,100
014	Litigation	1,100 - 1,250	\$955,500 - \$1,137,500
015	Plan and Disclosure Statement	200 - 250	\$226,000 - \$282,500
021	Tax	0 - 5	\$0.00 - \$7,200
024	Creditor Communications	15 - 20	\$19,950 - \$26,600
	TOTAL	1,750 - 1,950	\$1,610,000 - \$1,794,000
	TOTAL WITH 10% DISCOUNT	1,750 - 1,950	\$1,449,000 - \$1,614,600

¹ Budgeted amounts do not necessarily reflect to a 1:1 ratio because they reflect a blended hourly rate and a variable allocation of timekeepers and hours, depending on the needs for each category.

**Staffing Across All Matter Categories for the Period from
March 1, 2021 to and Including May 31, 2021**

Category of Timekeeper	Number of Timekeepers Expected to Perform Work Across All Matter Categories During the Application Period	Average Hourly Rate²
Partner	6 - 8	\$1,305
Senior Counsel/Counsel	NA	NA
Associate (3+ years since first admission)	5 - 6	\$895
Jr. Associate (1–3 years since first admission)	3 - 5	\$660
Paraprofessionals	2 - 3	\$483
Support Staff	0 – 2	\$240
Total Attorney	14 – 19	\$1,024
Total Non-Attorney	2 – 5	\$481
Total	16 – 24	\$924
Total with 10% Discount	16 – 24	\$832

² The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of chargeable hours worked by, each timekeeper during the Interim Fee Period.

Exhibit F

Customary and Comparable Compensation Disclosure

Customary and Comparable Compensation Disclosure

The blended hourly rate of the Sidley timekeepers (including both professionals and paraprofessionals) who provided services to the Committee during the Interim Fee Period was \$924.12 per hour (the “Committee Blended Rate”).¹ The Committee Blended Rate after applying a 10% Discount was \$831.71 per hour.

The blended hourly standard rate for all of Sidley’s domestic, non-bankruptcy timekeepers during the twelve-month period from June 1, 2020 to and including May 31, 2021 (the “Comparable Period”) was, in the aggregate, approximately \$957.00 (the “Non-Bankruptcy Blended Rate”).²

A detailed comparison of the Committee Blended Rate, Committee Blended Rate with 10% Discount and the Non-Bankruptcy Blended Rate is set forth in the chart below.

Category of Timekeeper	Committee Blended Rate	Committee Blended Rate with 10% Discount	Non-Bankruptcy Blended Rate
Partner	\$1,305	\$1,174.50	\$1,232
Senior Counsel/Counsel	NA	NA	\$1,062
Associate	\$895	\$805.50	\$906
Junior Associate	\$660	\$594.00	\$657
Paraprofessional	\$481	\$432.90	\$360
Aggregate	\$924	\$831.71	\$957

¹ Sidley calculated the Committee Blended Rate by dividing the total fees billed by Sidley timekeepers to the Committee during the Interim Fee Period by the total number of chargeable hours worked by such timekeepers on behalf of the Committee during such period. The Committee Blended Rate does not include fees and corresponding chargeable hours voluntarily reduced by Sidley, if any, prior to the filing of the Application.

² Sidley calculated the Non-Bankruptcy Blended Rate by dividing the total amount of fees billed to clients by Sidley’s domestic, non-bankruptcy timekeepers during the Comparable Period by the total number of chargeable hours worked on behalf of clients by such timekeepers during the Comparable Period. The Non-Bankruptcy Blended Rate does not include fees and corresponding chargeable hours voluntarily reduced by Sidley prior to submission of the relevant invoices to Sidley’s clients. For the avoidance of doubt, the Non-Bankruptcy Blended Hourly Rates reflect Firm-wide increases that took effect across all of the Firm’s practice groups on January 1, 2021.