

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

LORDSTOWN MOTORS CORP., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Obj Deadline: April 25, 2024 at 4:00 p.m. (ET)

Hearing Date: *Only if objections are filed*

**SUMMARY COVER SHEET FOR SEVENTH MONTHLY FEE APPLICATION OF
BAKER & HOSTETLER LLP, AS SPECIAL LITIGATION AND CORPORATE
COUNSEL FOR THE DEBTORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF
JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

Name of Applicant	Baker & Hostetler LLP
Authorized to Provide Professional Services to:	Debtors
Date of Retention:	August 18, 2023, <i>nunc pro tunc to June 27, 2023</i>
Period for Which Compensation and reimbursement are Requested:	January 1, 2024 – January 31, 2024
Total Amount of Compensation (100%):	\$158,128.20 ²
Amount of Compensation Requested (80%):	\$126,502.56
Amount of Compensation Held Back (20%):	\$31,625.64
Amount of Expense Reimbursement Requested:	\$28.18
Aggregate Amount to be Paid Under Interim Compensation Order upon filing certificate of no objection regarding Application after expiration of Objection Deadline:	\$126,530.74

This is a monthly fee application.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Baker & Hostetler has reduced the amount requested by \$17,569.80 as a result of courtesy discounts that have been applied consistent with past practices.



23108312404050000000000002

**SUMMARY OF BILLING BY PROFESSIONAL
JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

Name of Professional	Date of Bar Admission	Position with the Applicant	Hourly Billing Rate	Total Billed Hours	Total Compensation
Susan L. Atkinson		Paralegal	285.00	2.7	769.50
Michael W. Gunther	11/13/2023	Associate	380.00	8.7	3,306.00
Suzanne K. Hanselman	11/18/1991	Partner	855.00	1.8	1,539.00
Amy E. Kellogg	11/12/1986	Partner	850.00	2.1	1,785.00
Melissa A. Leonard	05/15/1995	Partner	650.00	64.0	41,600.00
Robert L. McEvoy	11/13/2018	Associate	500.00	6.9	3,450.00
Brian M. Murray	11/08/1999	Partner	730.00	2.0	1,460.00
Jennifer R. Rodriguez	09/08/2014	Associate	985.00	2.4	2,364.00
Douglas L. Shively	01/11/2016	Partner	615.00	.6	369.00
Janet A. Spreen	05/16/2005	Partner	825.00	113.1	93,307.50
Brittany E. Stevenson	12/14/2020	Associate	445.00	54.0	24,030.00
Sarah M. Szalay		Paralegal	300.00	2.3	690.00
Carrie A. Valdez	11/16/2015	Associate	560.00	.3	168.00
Michael A. VanNiel	11/13/2001	Partner	860.00	1.0	860.00
TOTAL INCURRED				261.9	175,698.00
LESS DISCOUNTS					-17,569.80
TOTAL AMOUNT				261.9	158,128.20
	Blended Rate:				603.77

COMPENSATION BY PROJECT CATEGORY
JANUARY 1, 2024 THROUGH JANUARY 31, 2024

Task Code	Category Description	Total Hours	Total Fees
B100	Administration	4.5	2,308.50
B110	Case Administration	15.0	9,582.00
B160	Fee – Employment Applications	2.5	1,310.00
B200	Operations	28.5	18,525.00
B250	Real Estate	9.0	5,235.00
B260	Board of Director Matters	15.3	9,945.00
B460	Securities Matters	187.1	128,792.50
	Totals	261.9	175,698.00
	Less Discounts		-17,569.80
	Totals	261.9	158,128.20

EXPENSE SUMMARY
JANUARY 1, 2024 THROUGH JANUARY 31, 2024

Expense Category	Amount
Delivery Services	28.18
Total:	28.18

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

LORDSTOWN MOTORS CORP., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Obj Deadline: April 25, 2024 at 4:00 p.m. (ET)

Hearing Date: *Only if objections are filed*

**NOTICE OF SEVENTH MONTHLY FEE APPLICATION OF BAKER & HOSTETLER
LLP, AS SPECIAL LITIGATION AND CORPORATE COUNSEL FOR THE DEBTORS,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OF JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

PLEASE TAKE NOTICE that Baker & Hostetler LLP (“**B&H**”) has filed the attached *Seventh Monthly Fee Application of Baker & Hostetler LLP for Allowance of Compensation and Reimbursement of Expenses as Special Litigation and Corporate Counsel for the Debtors for the Period from January 1, 2024 through January 31, 2024* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, DE 19801 (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE objections, if any, to the Application must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members*, entered July 25, 2023 [D.I. 181] (the “**Interim Compensation Order**”) and must be filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, DE 19801, and be served upon and received by (a) counsel to the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”), (i) White & Case LLP, 200 South Biscayne Boulevard, Suite 4900, Miami, FL 33131 (Attn: Thomas E. Lauria (tlauria@whitebase.com), Matthew C. Brown (mbrown@whitecase.com), and Fan B. He (fhe@whitecase.com)); (ii) White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020 (Attn: David M. Turetsky (david.turetsky@whitecase.com)); (iii) White & Case LLP, 111 South Wacker Drive, Suite 5100, Chicago, IL 60606 (Attn: Jason N. Zakia (jzakia@whitecase.com)); and (iv) White & Case LLP, 555 South Flower Street, Suite 2700, Los Angeles, CA 90071 (Attn: Roberto Kampfner (rkampfner@whitecase.com)); (b) counsel to the Debtors, Womble Bond Dickinson (US) LLP, 1313 North Market Street, Suite 1200, Wilmington, DE 19801 (Attn: Donald J. Detweiler (don.detweiler@wbd-us.com) and Morgan L. Patterson (morgan.patterson@wbd-us.com)); (c) counsel to the Official Committee of Unsecured Creditors, (i) Troutman Pepper Hamilton Sanders LLP, Hercules Plaza, Suite 5100, 1313 N. Market Street, Wilmington, DE 19801 (Attn: David M.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Fournier (david.fournier@troutman.com), Marcy J. McLaughlin Smith (marcy.smith@troutman.com), and Tori L. Remington (tori.remington@troutman.com)); (ii) Troutman Pepper Hamilton Sanders LLP, 3000 Tow Logan Square, 18th & Arch Streets, Philadelphia, PA 19103-2799 (Attn: Francis J. Lawall (francis.lawall@troutman.com)); (iii) Troutman Pepper Hamilton Sanders LLP, 875 Third Avenue, New York, NY 10022 (Attn: Deborah Kovsky-Apap (deborah.kovsky@troutman.com)); and (iv) Troutman Pepper Hamilton Sanders LLP, 4000 Town Center, Suite 1800, Southfield, MI 48075 (Attn: Sean P. McNally (sean.mcnally@troutman.com)); (d) proposed counsel to the Official Committee of Equity Security Holders, Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, DE 19801 (Attn: Eric J. Monzo, Brya M. Keilson); (e) proposed counsel to the Official Committee of Equity Security Holders, (i) Brown Rudnick LLP, 7 Times Square, New York, NY 10036 (Attn: Robert J. Stark (rstark@brownrudnick.com) and Bennet S. Silverberg (bsilverberg@brownrudnick.com)), and (ii) Brown Rudnick LLP, One Financial Center, Boston, MA 02111 (Attn: Matthew A. Sawyer (msawyer@brownrudnick.com)); (f) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, DE 19801 (Attn: Benjamin A. Hackman (Benjamin.A.Hackman@sdoj.gov)); (g) the Applicant, Baker & Hostetler LLP, Key Tower, 127 Public Square, Suite 2000, Cleveland, OH 44114 (Attn: Michael A. VanNiel (mvanniel@bakerlaw.com)) by no later than **4:00 p.m. (prevailing Eastern Time) on April 25, 2024 (the “Objection Deadline”)**.

PLEASE TAKE FURTHER NOTICE that if any responses or objections to the Application are timely filed, served and received in accordance with this notice, a hearing on the Application will be held at the convenience of the Bankruptcy Court. Only those objections made in writing and timely filed and received in accordance with the Interim Compensation Order and the procedures described herein will be considered by the Bankruptcy Court at such hearing.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Interim Compensation Order, if no objection to the Application is timely filed, served and received by the Objection Deadline, B&H may be paid an amount equal to the lesser of (i) 80 percent (80%) of the fees and 100 percent (100%) of the expenses requested in the Application or (ii) 80 percent (80%) of the fees and 100 percent (100%) of the expenses not subject to an objection without the need for further order of the Bankruptcy Court.

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Dated: April 5, 2024

BAKER & HOSTETLER LLP

/s Michael A. VanNiel

Michael A. VanNiel
Key Tower
127 Public Square, Suite 2000
Cleveland, Ohio 44114
Telephone: (216) 621-0200
Facsimile: (216) 696-0740
mvanniel@bakerlaw.com

*Special Litigation and Corporate Counsel for
the Debtors*

BAKER & HOSTETLER LLP

/s Jeffrey J. Lyons

Jeffrey J. Lyons (#6437)
1201 N. Market Street, Suite 1407
Wilmington, DE 19801
Telephone: (302) 468-7088
jjlyons@bakerlaw.com

*Special Litigation and Corporate Counsel for
the Debtors*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

LORDSTOWN MOTORS CORP., *et al.*,

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Chapter 11

Case No. 23-10831 (MFW)

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**SEVENTH MONTHLY FEE APPLICATION OF BAKER & HOSTETLER LLP, AS SPECIAL
LITIGATION AND CORPORATE COUNSEL FOR THE DEBTORS, FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OF JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

Baker & Hostetler LLP (“**B&H**”), special litigation and corporate counsel for the Debtors and the debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, hereby submits its *Seventh Monthly Fee Application of Baker & Hostetler LLP, as Special Litigation and Corporate Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period January 1, 2024 through January 31, 2024* (the “**Application**”), pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”), Rule 2016(a) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members*, entered July 25, 2023 [D.I. 181] (the “**Interim Compensation Order**”), for (i) allowance of compensation for professional legal

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services rendered and reimbursement of actual and necessary expenses incurred for the period from January 1, 2024 through January 31, 2024 (the “**Application Period**”), and respectfully represents as follows:

JURISDICTION AND VENUE

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

2. Venue of this proceeding and this Application is proper in this District pursuant to 28 U.S.C. §§1408 and 1409.

3. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code. Such relief is also warranted under Bankruptcy Rule 2016(a), Local Rule 2016-2, and the Interim Compensation Order.

BACKGROUND

A. The Chapter 11 Cases

4. On June 27, 2023, (the “**Petition Date**”), the Debtors commenced the above-captioned bankruptcy cases (the “**Chapter 11 Cases**”) by filing voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.

5. The Debtors have continued in the possession of their property and have continued to operate and manage its businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On July 11, 2023, the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed the official committee of unsecured creditors for these Chapter 11 Cases. No trustee or examiner has been appointed in these Chapter 11 Cases.

B. The Retention of Baker & Hostetler

7. The Court has authorized the Debtors to retain and employ B&H as their special litigation and corporate counsel, effective as of the Petition Date, pursuant to the *Order Authorizing the Retention and Employment of Baker & Hostetler LP as Special Litigation and Corporate Counsel for the Debtors Effective Nunc Pro Tunc to the Petition Date*, entered August 18, 2023 [D.I. 265] (the “**Retention Order**”).

C. The Interim Compensation Order

8. On July 25, 2023, the Court entered the Interim Compensation Order which sets forth the procedures for interim compensation and reimbursement of expenses in these Chapter 11 Cases. Specifically, the Interim Compensation Order provides that each Professional (as defined in the Interim Compensation Order) seeking interim compensation may file an application (a “**Monthly Fee Application**”) for interim approval and allowance of compensation for services rendered and reimbursement of expenses incurred during the immediately preceding month and serve a copy of such Monthly Fee Application on the Notice Parties (as defined in the Interim Compensation Order). Then, each Notice Party will have until 4:00 p.m. (prevailing Eastern Time) on the twentieth (20th) day after service of a Monthly Fee Application to object thereto (the “**Objection Deadline**”). Upon expiration of the Objection Deadline, the Professional may file a certificate of no objection consistent with Local Rule 9013-1(j) with the Court after which the Debtors are authorized to pay each Professional an amount equal to the lesser of: (i) 80 percent (80%) of the fees and 100 percent (100%) of the expenses requested in the Application or (ii) 80 percent (80%) of the fees and 100 percent (100%) of the expenses not subject to an objection.

RELIEF REQUESTED

9. Pursuant to the Interim Compensation Order and section 331 of the Bankruptcy Code, B&H makes this Application for allowance of compensation in the amount of \$158,128.20,

less a 20% holdback (in the amount \$31,625.64), for a total of \$126,502.56, for professional services rendered. This amount is derived solely from the applicable hourly billing rates of B&H's attorneys and paraprofessionals who rendered such services to the Debtors. In addition, B&H seeks reimbursement of expenses incurred during the Application Period in the amount of \$28.18.

A. Compensation Requested

10. Attached hereto as Exhibit A is a detailed itemization, by project category, of all services performed by B&H with respect to the Chapter 11 Cases during the Application Period. This detailed itemization complies with Local Rule 2016-2(d) in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

11. The attorneys and paraprofessionals who rendered services related to each category are identified in Exhibit A, along with the number of hours for each individual and the total compensation sought for each category. All services for which B&H requests compensation were performed for or on behalf of the Debtors.

B. Expense Reimbursement

12. B&H incurred out-of-pocket expenses during the Application Period in the amount of \$28.18. Attached hereto as Exhibit A is a description of the expenses actually incurred by B&H in the performance of services rendered as counsel to the Debtors. The expenses are broken down into categories of charges, which may include, among other things, the following charges: photocopying, postage, telephonic appearances, messenger service, transcripts, computerized legal research, and filing fees.

13. In accordance with section 330 of the Bankruptcy Code, B&H seeks reimbursement only for the actual cost of such expenses to B&H. B&H submits that the expenses incurred were customary and necessary.

VALUATION OF SERVICES

14. Attorneys and paraprofessionals of B&H have expended a total of 261.9 hours in connection with this matter during the Application Period.

15. The amount of time spent by each of the professionals providing services to the Debtors for the Application Period is set forth in Exhibit A. The rates are B&H's normal hourly rates of compensation for work of this nature. The reasonable value of the services rendered by B&H for the Application Period as counsel for the Debtors in the Chapter 11 Cases is \$158,128.20.

16. B&H believes that the time entries and the expense breakdown, included in Exhibit A attached hereto, are in compliance with the requirements of Local Rule 2016-2.

17. In accordance with the factors enumerated in 11 U.S.C. § 330, the amount requested is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

CERTIFICATE OF COMPLIANCE AND WAIVER

18. The undersigned representative of B&H certifies that he has reviewed the requirements of Local Rule 2016-2 and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-2, B&H believes that such deviations are not material and respectfully requests that any such requirements be waived.

NOTICE

19. Pursuant to the Interim Compensation Order, this Application is being served on: (a) the Debtors, (b) counsel to the Debtors, (c) the U.S. Trustee, and (d) all parties that have requested notice pursuant to Local Rule 2002-1. B&H submits that no other or further notice need be provided.

WHEREFORE, Baker & Hostetler LLP respectfully requests the Court enter an order: (i) granting the Application and authorizing (a) allowance of compensation in the amount of \$126,502.56 (80% of \$158,128.20) for professional services rendered, and (b) reimbursement of actual and necessary costs in the amount of \$28.18 incurred, during the Application Period; (ii) directing the payment by the Debtors of the foregoing amounts; and (iii) granting such other and further relief as the Court deems just and proper.

Dated: April 5, 2024

BAKER & HOSTETLER LLP

/s/ Michael A. VanNiel
Michael A. VanNiel (0073948)
Key Tower
127 Public Square, Suite 2000
Cleveland, Ohio 44114
Telephone: (216) 621-0200
Facsimile: (216) 696-0740
mvanniel@bakerlaw.com

*Special Litigation and Corporate Counsel
to the Debtors*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

LORDSTOWN MOTORS CORP., *et al.*,

Debtors.⁵

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2024, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the:

**SEVENTH MONTHLY FEE APPLICATION OF BAKER & HOSTETLER LLP,
SPECIAL LITIGATION AND CORPORATE COUNSEL TO THE DEBTORS, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OF JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and additional service was completed by U.S. mail on the parties indicated below.

White & Case LLP
Attn: Thomas E. Lauria,
Matthew C. Brown & Fan B. He
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131

White & Case LLP
Attn: David M. Turetsky
1221 Avenue of the Americas
New York, NY 10020

White & Case LLP
Attn: Jason N. Zakia
111 South Wacker Drive, Suite 5100
Chicago, IL 60606

White & Case LLP
Attn: Roberto Kampfner
555 South Flower Street, Suite 2700
Los Angeles, CA 90071

Womble Bond Dickinson (US) LLP
Attn: Donald J. Detweiler
Morgan L. Patterson
1313 North Market Street, Suite 1200,
Wilmington, DE 19801

Troutman Pepper Hamilton Sanders LLP
Attn: David M. Fournier, Marcy J. McLaughlin
Smith and Tori L. Remington
Hercules Plaza, Suite 5100
1313 N. Market Street
Wilmington, DE 19801

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Troutman Pepper Hamilton Sanders LLP
Attn: Francis J. Lawall
3000 Tow Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2799

Troutman Pepper Hamilton Sanders LLP
Attn: Deborah Kovsky-Apap
875 Third Avenue
New York, NY 10022

Troutman Pepper Hamilton Sanders LLP
Attn: Sean P. McNally
4000 Town Center, Suite 1800
Southfield, MI 48075

Office of the United States Trustee
Attn: Benjamin A. Hackman
844 King Stret, Suite 2207
Wilmington, DE 19801

Morris James LLP
Attn: Eric J. Monzo
Brya M. Keilson
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801

Brown Rudnick LLP
Attn: Robert J. Stark
Bennett S. Silverberg
7 Times Square
New York, NY 10036

Brown Rudnick LLP
Attn: Matthew A. Sawyer
One Financial Center
Boston, MA 02111

/s/ Michael A. VanNiel

Michael A. VanNiel

EXHIBIT A

Invoices

LORDSTOWN MOTORS CORP.
TASK CODE SUMMARY
JANUARY 1, 2024 - JANUARY 31, 2024

<u>Code</u>	<u>Category</u>	<u>Hours</u>	<u>Amount</u>
B100	Administration	4.5	2,308.50
B110	Case Administration	15.0	9,582.00
B160	Fee - Employment Applications	2.5	1,310.00
B200	Operations	28.5	18,525.00
B250	Real Estate	9.0	5,235.00
B260	Board of Director Matters	15.3	9,945.00
B460	Securities Matters	187.1	128,792.50
		261.9	175,698.00
	Less Discounts		-17,569.80
	Total	261.9	158,128.20

LORDSTOWN MOTORS CORP.
TIMEKEEPER SUMMARY
JANUARY 1, 2024 - JANUARY 31, 2024

<u>Timekeeper</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Atkinson, Susan L.	Paralegal	285.00	2.7	769.50
Gunther, Michael W.	Associate	380.00	8.7	3,306.00
Hanselman, Suzanne K.	Partner	855.00	1.8	1,539.00
Kellogg, Amy E.	Partner	850.00	2.1	1,785.00
Leonard, Melissa A.	Partner	650.00	64.0	41,600.00
McEvoy, Robert L.	Associate	500.00	6.9	3,450.00
Murray, Brian M.	Partner	730.00	2.0	1,460.00
Rodriguez, Jennifer R.	Associate	985.00	2.4	2,364.00
Shively, Douglas L.	Partner	615.00	0.6	369.00
Spreen, Janet A.	Partner	825.00	113.1	93,307.50
Stevenson, Brittany E.	Associate	445.00	54.0	24,030.00
Szalay, Sarah M.	Paralegal	300.00	2.3	690.00
Valdez, Carrie A.	Associate	560.00	0.3	168.00
VanNiel, Michael A.	Partner	860.00	1.0	860.00
			261.9	175,698.00
		Less Discounts		-17,569.80
		Total	261.9	158,128.20

**LORDSTOWN MOTORS CORP.
EXPENSE SUMMARY
JANUARY 1, 2024 - JANUARY 31, 2024**

Delivery Services	28.18
Total	28.18

Date	Name	Description	Rate	Hours	Amount
	L.	comments to audit response.			
01/18/24	Atkinson, Susan	Revise draft to reflect matter summary provided by Mr. Dawson.	285.00	0.20	57.00
	L.				
01/22/24	Atkinson, Susan	Re-run the audit inquiry to comply with the terms of the request.	285.00	0.10	28.50
	L.				
01/22/24	Atkinson, Susan	Review and track attorney responses to audit request inquiry and send follow up email to those who have not yet responded.	285.00	0.20	57.00
	L.				
01/22/24	Atkinson, Susan	Request updates to seven previously reported matters.	285.00	0.10	28.50
	L.				
01/22/24	Atkinson, Susan	Review prior correspondence to determine which attorneys to ask for specific matter updates.	285.00	0.20	57.00
	L.				
01/23/24	Atkinson, Susan	Request and receive Ms. Leonard's approval for audit response content, detailing outstanding issues in track changes.	285.00	0.30	85.50
	L.				
01/23/24	Atkinson, Susan	Send response to audit committee member for approval.	285.00	0.10	28.50
	L.				
01/23/24	Atkinson, Susan	Finalize audit response.	285.00	0.20	57.00
	L.				
01/23/24	Atkinson, Susan	Obtain signature to response and send to auditor and client.	285.00	0.10	28.50
	L.				
01/23/24	Atkinson, Susan	Supplement electronic and hard copy files.	285.00	0.10	28.50
	L.				
01/23/24	Hanselman, Suzanne K.	Conduct audit committee review of audit response.	855.00	0.30	256.50
Administration(B100)				4.50	2,308.50
01/02/24	Szalay, Sarah M.	Access and obtain current docket and recently filed pleadings and forward to Mr. VanNiel for review.	300.00	0.20	60.00
01/04/24	Shively, Douglas L.	Attention to document preservation issues relating to shipment of boxes received from	615.00	0.60	369.00

Baker & Hostetler LLP

Date	Name	Description	Rate	Hours	Amount
		Amanda Ciccone.			
01/08/24	Leonard, Melissa A.	Messages to and from White & Case and Mr. Ninivaggi regarding outstanding disputes to Plan and status of Hudson's response to Dechert.	650.00	0.50	325.00
01/08/24	Leonard, Melissa A.	Weekly update meeting with White & Case.	650.00	0.50	325.00
01/08/24	Szalay, Sarah M.	Access and obtain current docket and recently filed pleadings and forward to Mr. VanNiel for review.	300.00	0.10	30.00
01/09/24	Szalay, Sarah M.	Access and obtain recently filed pleadings and forward to Mr. VanNiel for review.	300.00	0.10	30.00
01/11/24	Leonard, Melissa A.	Attend meeting with White & Case to review outstanding work streams.	650.00	0.80	520.00
01/11/24	Leonard, Melissa A.	Attention to SEC communications.	650.00	1.00	650.00
01/12/24	Leonard, Melissa A.	Attention to SEC matters.	650.00	1.50	975.00
01/15/24	Leonard, Melissa A.	Review revised Plan and Schedule of Retained Causes of Action.	650.00	1.00	650.00
01/15/24	Leonard, Melissa A.	Respond to Mr. Ninivaggi's question concerning factual information impacting the revised Plan.	650.00	0.50	325.00
01/15/24	Valdez, Carrie A.	Advise client regarding EEO-1 filing obligations.	560.00	0.30	168.00
01/16/24	Leonard, Melissa A.	Attention to case administration.	650.00	1.00	650.00
01/17/24	Leonard, Melissa A.	Attention to case administration.	650.00	1.00	650.00
01/17/24	Murray, Brian M.	Draft email for Ms. Leonard regarding the permissible uses of forfeitures under the savings plan.	730.00	0.30	219.00
01/18/24	Leonard,	Attention to case administration.	650.00	1.00	650.00

Baker & Hostetler LLP

Date	Name	Description	Rate	Hours	Amount
	Melissa A.				
01/19/24	Leonard, Melissa A.	Attention to case administration.	650.00	1.00	650.00
01/22/24	Leonard, Melissa A.	Attention to case administration.	650.00	1.00	650.00
01/22/24	Szalay, Sarah M.	Access and obtain current docket and recently filed pleadings and forward to Mr. VanNiel for review.	300.00	0.10	30.00
01/23/24	Szalay, Sarah M.	Access and obtain recently filed pleadings and forward to Mr. VanNiel for review.	300.00	0.20	60.00
01/29/24	Leonard, Melissa A.	Attention to filings.	650.00	0.50	325.00
01/29/24	Murray, Brian M.	Draft e-mail for Mr. Port regarding the categories of compensation that would be includible under the savings plan to determine the amount of matching contributions and the plan's provisions regarding true-up contributions.	730.00	1.70	1,241.00
01/30/24	Szalay, Sarah M.	Access and obtain recently filed pleadings and forward to Mr. VanNiel for review.	300.00	0.10	30.00
Case Administration(B110)				15.00	9,582.00
01/08/24	VanNiel, Michael A.	Review and comment on Fourth Monthly Fee Statement.	860.00	0.10	86.00
01/08/24	VanNiel, Michael A.	Correspondence with working group regarding Fourth Monthly Fee Statement.	860.00	0.10	86.00
01/09/24	Szalay, Sarah M.	Prepare Baker & Hostetler's Fifth Monthly Fee Statement and forward to Mr. VanNiel for review and comment.	300.00	1.00	300.00
01/09/24	VanNiel, Michael A.	Correspondence with White & Case team regarding Baker Fourth Monthly Statement.	860.00	0.10	86.00
01/09/24	VanNiel, Michael A.	Review and address supplemental disclosures regarding Baker Hostetler retention.	860.00	0.10	86.00

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Date	Name	Description	Rate	Hours	Amount
01/10/24	Szalay, Sarah M.	Prepare Notice of Rate Increase and forward to Mr. VanNiel for review and comment.	300.00	0.30	90.00
01/10/24	VanNiel, Michael A.	Correspondence with working group regarding supplemental disclosures for filing with court.	860.00	0.20	172.00
01/17/24	VanNiel, Michael A.	Review and comment on latest monthly fee statement for Baker & Hostetler.	860.00	0.40	344.00
01/19/24	Szalay, Sarah M.	Revise Notice of Rate Increase at the request of Mr. VanNiel.	300.00	0.20	60.00

Fee - Employment Application(B160)

2.501,310.00

01/02/24	Leonard, Melissa A.	Attention to severance agreements.	650.00	0.50	325.00
01/02/24	Leonard, Melissa A.	Attention to supplier issues.	650.00	0.50	325.00
01/02/24	Leonard, Melissa A.	Attention to obtaining title documents from DC.	650.00	0.50	325.00
01/03/24	Leonard, Melissa A.	Attention to severance agreements.	650.00	0.50	325.00
01/04/24	Leonard, Melissa A.	Attention to obtaining vehicles titles from DC.	650.00	0.10	65.00
01/04/24	Leonard, Melissa A.	Meeting with White & Case to review open items.	650.00	0.20	130.00
01/04/24	Leonard, Melissa A.	Attention to issues with former employees.	650.00	0.70	455.00
01/04/24	Leonard, Melissa A.	Meeting to review winddown checklist and follow-up on responsibilities.	650.00	2.00	1,300.00
01/05/24	Leonard, Melissa A.	Attention to transfer of charging truck to Fisker.	650.00	1.50	975.00
01/05/24	Leonard, Melissa A.	Attention to scrapping of DC vehicle that was located in Farmington Hills.	650.00	1.50	975.00
01/05/24	Leonard,	Review Asset Transfer Letter from Dassault	650.00	0.20	130.00

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Date	Name	Description	Rate	Hours	Amount
	Melissa A.	Systems.			
01/05/24	Leonard, Melissa A.	Messages from and to Mr. Hightower regarding same.	650.00	0.10	65.00
01/08/24	Leonard, Melissa A.	Review information provided by Aon.	650.00	0.50	325.00
01/08/24	Leonard, Melissa A.	Attention to supplier claims.	650.00	1.00	650.00
01/08/24	Leonard, Melissa A.	Attention to vehicle removal from Farmington Hills.	650.00	0.30	195.00
01/09/24	Leonard, Melissa A.	Attention to Mr. Bowen's garnishment issue.	650.00	0.50	325.00
01/10/24	Leonard, Melissa A.	Attention to Mr. Backing's claims regarding severance payment.	650.00	0.50	325.00
01/10/24	Leonard, Melissa A.	Attention to documents needed by KPMG for audit.	650.00	4.50	2,925.00
01/10/24	Leonard, Melissa A.	Messages to and from Mr. Skiljan regarding information needed from Aon.	650.00	0.20	130.00
01/10/24	Leonard, Melissa A.	Attention to destruction of vehicle in Farmington Hills.	650.00	0.10	65.00
01/10/24	Leonard, Melissa A.	Telephone meeting with collection agency regarding Mr. Bowen's garnishment.	650.00	0.20	130.00
01/11/24	Leonard, Melissa A.	Attend meetings regarding supplier claims and pre-emergence matters.	650.00	1.50	975.00
01/11/24	Leonard, Melissa A.	Attend meeting with Aon to discuss existing policies and manner in which to extend D&O policy, if necessary.	650.00	1.00	650.00
01/12/24	Leonard, Melissa A.	Attention to payment for repurchased DC vehicles.	650.00	0.70	455.00
01/12/24	Leonard, Melissa A.	Attention to Mr. Bowen's garnishment issue.	650.00	0.50	325.00
01/12/24	Leonard, Melissa A.	Attention to retainers and the return of the retainers.	650.00	0.70	455.00

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Date	Name	Description	Rate	Hours	Amount
01/23/24	Leonard, Melissa A.	Attention to issues relating to rejected leases.	650.00	1.00	650.00
01/24/24	Leonard, Melissa A.	Attention to status of various pre-emergence activities.	650.00	1.00	650.00
01/25/24	Leonard, Melissa A.	Attention to NHTSA correspondence and pre-emergence activities.	650.00	1.00	650.00
01/26/24	Leonard, Melissa A.	Meet with NHTSA counsel and Mr. Hightower to discuss NHTSA correspondence and response thereto.	650.00	0.70	455.00
01/26/24	Leonard, Melissa A.	Review and comment on NHTSA correspondence.	650.00	0.80	520.00
01/26/24	Leonard, Melissa A.	Attention to 401K true up questions.	650.00	0.50	325.00
01/29/24	Leonard, Melissa A.	Attention to return of security deposits and sale of vehicle to Fisker.	650.00	1.00	650.00
01/30/24	Leonard, Melissa A.	Attention to execution of SEC offer.	650.00	0.50	325.00
01/31/24	Leonard, Melissa A.	Attention to accounting memo for litigation reserve.	650.00	1.00	650.00
01/31/24	Leonard, Melissa A.	Attention to supplier claims.	650.00	0.50	325.00
Operations(B200)				28.50	18,525.00

01/23/24	Kellogg, Amy E.	Conference with Ms. Leonard regarding letter to landlord of Irvine, CA lease.	850.00	0.30	255.00
01/23/24	McEvoy, Robert L.	Discuss security deposit dispute and discuss matters relating to same.	500.00	0.20	100.00
01/23/24	McEvoy, Robert L.	Review and analyze correspondence regarding bankruptcy law analysis of landlord's calculation of leasing costs.	500.00	0.20	100.00
01/23/24	McEvoy, Robert L.	Review and analyze proof of claim and Lease.	500.00	0.20	100.00

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Date	Name	Description	Rate	Hours	Amount
01/24/24	McEvoy, Robert L.	Review and analyze lease, addenda and first amendment.	500.00	0.20	100.00
01/24/24	McEvoy, Robert L.	Review and analyze proof of claim.	500.00	0.30	150.00
01/24/24	McEvoy, Robert L.	Draft letter to landlord regarding request for return of the security deposit and matters relating to rejection damages pursuant to landlord's proof of claim filing.	500.00	0.30	150.00
01/25/24	Kellogg, Amy E.	Review lease and proof of claim.	850.00	0.50	425.00
01/25/24	Kellogg, Amy E.	Review and revise letter to landlord regarding security deposit.	850.00	0.50	425.00
01/25/24	Kellogg, Amy E.	Conference with Mr. McEvoy.	850.00	0.50	425.00
01/25/24	McEvoy, Robert L.	Review and analyze lease and addenda and first amendment thereto.	500.00	0.30	150.00
01/25/24	McEvoy, Robert L.	Review and analyze landlord's proof of claim and assertion of damages in connection with same.	500.00	0.30	150.00
01/25/24	McEvoy, Robert L.	Draft letter to landlord regarding the return of the security deposit and matters relating to landlord's claim for rejection damages.	500.00	2.30	1,150.00
01/25/24	McEvoy, Robert L.	Draft summary of lease analysis in connection with analysis of landlord's Proof of Claim and attend to discussions of same.	500.00	0.90	450.00
01/29/24	Kellogg, Amy E.	Conference with Mr. McEvoy.	850.00	0.10	85.00
01/29/24	Kellogg, Amy E.	Review revised letter to landlord.	850.00	0.10	85.00
01/29/24	Kellogg, Amy E.	Communications with Ms. Leonard regarding revised letter to landlord.	850.00	0.10	85.00
01/29/24	McEvoy, Robert L.	Conduct research regarding return of security deposit to tenant under commercial lease pursuant to California law and discuss same.	500.00	0.90	450.00
01/29/24	McEvoy, Robert L.	Draft correspondence regarding summary of laws regarding timing to return a security	500.00	0.30	150.00

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Date	Name	Description	Rate	Hours	Amount
		deposit for a commercial tenant and questions relating to same.			
01/29/24	McEvoy, Robert L.	Review and analyze correspondence regarding return of possession of property to landlord.	500.00	0.10	50.00
01/29/24	McEvoy, Robert L.	Revise letter to landlord regarding return of security deposit and attend to matters relating to same.	500.00	0.40	200.00
Real Estate(B250)				9.00	5,235.00
01/02/24	Leonard, Melissa A.	Attention to board matters.	650.00	0.50	325.00
01/03/24	Leonard, Melissa A.	Attention to board matters.	650.00	0.50	325.00
01/08/24	Leonard, Melissa A.	Review D&O forms and correspondence from Ms. Spreen regarding plan to distribute same.	650.00	1.00	650.00
01/08/24	Leonard, Melissa A.	Review information regarding share availability and board members' deferral of RSUs.	650.00	0.70	455.00
01/10/24	Leonard, Melissa A.	Attention to scheduling board of directors meeting.	650.00	0.50	325.00
01/11/24	Leonard, Melissa A.	Attention to board of director meeting.	650.00	1.30	845.00
01/11/24	Leonard, Melissa A.	Attention to minutes for prior board meetings.	650.00	3.00	1,950.00
01/12/24	Leonard, Melissa A.	Attention to minutes for prior board meetings.	650.00	0.20	130.00
01/12/24	Leonard, Melissa A.	Attend board of directors' meeting and provide materials for same.	650.00	1.30	845.00
01/23/24	Leonard, Melissa A.	Attention to board of director minutes and questionnaires.	650.00	2.00	1,300.00
01/25/24	Leonard, Melissa A.	Attention to bankruptcy plan and communications to directors.	650.00	1.00	650.00

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Date	Name	Description	Rate	Hours	Amount
01/26/24	Leonard, Melissa A.	Attention to certification to SEC in connection with offer to SEC.	650.00	0.50	325.00
01/26/24	Leonard, Melissa A.	Draft resolution for approval by the Board of Directors.	650.00	0.50	325.00
01/26/24	Leonard, Melissa A.	Correspondence to Board of Directors regarding draft resolution.	650.00	0.50	325.00
01/29/24	Leonard, Melissa A.	Attention to board resolution.	650.00	0.30	195.00
01/31/24	Leonard, Melissa A.	Draft and distribute unanimous written consent for Board.	650.00	1.00	650.00
01/31/24	Leonard, Melissa A.	Correspondence with Board regarding draft consent.	650.00	0.50	325.00
Board Of Directors Matters(B260)				15.30	9,945.00

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B460 **Securities Matters**
 116592.000024

Name	Hours	Rate	Amount
Leonard, Melissa A.	8.90	\$ 650.00	\$ 5,785.00
Spreen, Janet A.	113.10	825.00	93,307.50
Gunther, Michael W.	8.70	380.00	3,306.00
Rodriguez, Jennifer R.	2.40	985.00	2,364.00
Stevenson, Brittany E.	54.00	445.00	24,030.00
10% Courtesy Discount			(12,879.25)
Total	187.10	\$	115,913.25

Date	Name	Description	Hours	Amount
01/02/24	Spreen, Janet A.	Correspondence with CUSIP and DTC regarding questions.	0.30	247.50
01/02/24	Spreen, Janet A.	Attention to Form 10-K preparation questions and planning.	2.00	1,650.00
01/02/24	Stevenson, Brittany E.	Prepare resolutions.	1.60	712.00
01/03/24	Spreen, Janet A.	Call with Ms. Stevenson regarding preparation of items for emergence and 10-K filing.	0.50	412.50
01/03/24	Spreen, Janet A.	Correspondence with DTC and CUSIP regarding requirements.	0.50	412.50
01/03/24	Stevenson, Brittany E.	Prepare director and officer questionnaires.	0.50	222.50
01/03/24	Stevenson, Brittany E.	Prepare resolutions.	1.60	712.00
01/03/24	Stevenson, Brittany E.	Prepare director resignation letters.	0.50	222.50
01/03/24	Stevenson, Brittany E.	Call with Ms. Spreen to discuss post-effective matters.	0.60	267.00
01/03/24	Stevenson, Brittany E.	Review sample disclosure and prepare Form 8-K.	1.00	445.00

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Date	Name	Description	Hours	Amount
01/04/24	Leonard, Melissa A.	Attention to 8-K.	0.30	195.00
01/04/24	Spreen, Janet A.	Prepare and file Form 8-K.	2.50	2,062.50
01/04/24	Stevenson, Brittany E.	Prepare director and officer questionnaires.	1.30	578.50
01/04/24	Stevenson, Brittany E.	Prepare Form 8-K for filing.	0.40	178.00
01/05/24	Spreen, Janet A.	Attention to Broadridge question.	0.10	82.50
01/05/24	Spreen, Janet A.	Prepare Board minutes.	0.30	247.50
01/05/24	Spreen, Janet A.	Review updates to D&O questionnaires.	0.70	577.50
01/05/24	Spreen, Janet A.	Attention to Form 10-K preparation questions and planning.	1.70	1,402.50
01/06/24	Leonard, Melissa A.	Attention to potential 8-K filing.	0.50	325.00
01/06/24	Leonard, Melissa A.	Telephone meetings with Mr. Ninivaggi and Ms. Spreen regarding potential 8-K filing.	0.30	195.00
01/06/24	Spreen, Janet A.	Attention to Form 8-K for filing of SEC claim.	4.00	3,300.00
01/07/24	Leonard, Melissa A.	Attention to 8-K filing.	1.00	650.00
01/07/24	Leonard, Melissa A.	Telephone meetings with Mr. Ninivaggi, Mr. Kroll and Ms. Spreen regarding 8-K filing.	0.30	195.00
01/07/24	Spreen, Janet A.	Attention to Form 8-K for filing of SEC claim.	1.50	1,237.50
01/07/24	Stevenson, Brittany E.	Prepare director and officer questionnaires.	0.30	133.50
01/08/24	Leonard, Melissa A.	Attention to 8-K.	0.50	325.00
01/08/24	Spreen, Janet A.	Review equity grant and plan balance matters.	2.00	1,650.00
01/08/24	Spreen, Janet A.	Review draft documents for termination of registration statement matters.	2.20	1,815.00
01/08/24	Spreen, Janet A.	Attention to Form 8-K for filing of SEC claim.	1.50	1,237.50

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Date	Name	Description	Hours	Amount
01/08/24	Stevenson, Brittany E.	Prepare director and officer questionnaires.	6.00	2,670.00
01/09/24	Leonard, Melissa A.	Attention to 8K.	0.50	325.00
01/09/24	Spreen, Janet A.	Attention to share deferral questions.	0.80	660.00
01/09/24	Spreen, Janet A.	Attention to questionnaires and 10-K planning.	2.50	2,062.50
01/09/24	Spreen, Janet A.	Attention to open items on emergence checklist.	0.40	330.00
01/09/24	Stevenson, Brittany E.	Review and update resolutions.	0.40	178.00
01/09/24	Stevenson, Brittany E.	Review and update director and officer questionnaires.	2.50	1,112.50
01/10/24	Leonard, Melissa A.	Review emergence checklist prepared by Ms. Spreen.	0.50	325.00
01/10/24	Leonard, Melissa A.	Review emails regarding RSU deferrals by directors.	0.50	325.00
01/10/24	Spreen, Janet A.	Update emergence checklist.	0.20	165.00
01/10/24	Spreen, Janet A.	Attention to share deferral questions.	0.70	577.50
01/10/24	Spreen, Janet A.	Attention to Board resolutions for emergence matters.	0.50	412.50
01/11/24	Spreen, Janet A.	Attention to 10-K information, timing and drafting.	2.90	2,392.50
01/11/24	Spreen, Janet A.	Attention to share deferral and stock plan questions.	0.70	577.50
01/11/24	Spreen, Janet A.	Attention to open items on emergence checklist for registration statements.	1.00	825.00
01/12/24	Gunther, Michael W.	Meeting with Ms. Spreen to discuss assignment regarding 10-K filing.	0.30	114.00
01/12/24	Leonard, Melissa A.	Attention to 10K matters.	1.00	650.00
01/12/24	Spreen, Janet A.	Draft 10-K.	6.50	5,362.50
01/12/24	Spreen, Janet A.	Review and revise sets of resolutions	1.50	1,237.50

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Date	Name	Description	Hours	Amount
		needed for emergence matters.		
01/12/24	Spreen, Janet A.	Review materials for and attend LMC Board Meeting.	1.00	825.00
01/12/24	Spreen, Janet A.	Call regarding Form 10-K timeline and process.	0.80	660.00
01/12/24	Spreen, Janet A.	Attention to draft minutes status.	0.30	247.50
01/13/24	Spreen, Janet A.	Draft 10-K.	7.00	5,775.00
01/15/24	Leonard, Melissa A.	Review draft of compensation disclosure for the 10K.	0.70	455.00
01/15/24	Leonard, Melissa A.	Messages to and from Ms. Spreen and Mr. Port regarding compensation disclosure for the 10-K.	0.30	195.00
01/15/24	Leonard, Melissa A.	Review documents prepared by Ms. Spreen relating to withdrawal of registration statement, registration rights waiver, emergence checklist and proposed resolutions.	1.00	650.00
01/15/24	Spreen, Janet A.	Attention to questions on executive compensation disclosure and other 10-K items.	2.50	2,062.50
01/16/24	Spreen, Janet A.	Prepare 10-K draft.	9.00	7,425.00
01/16/24	Spreen, Janet A.	Attention to D&O questionnaire updates and responses.	0.60	495.00
01/16/24	Spreen, Janet A.	Attention to deferral questions.	0.30	247.50
01/17/24	Gunther, Michael W.	Draft 10-k bios for new directors and officers.	1.50	570.00
01/17/24	Spreen, Janet A.	Attention to open items for effective date.	0.50	412.50
01/17/24	Spreen, Janet A.	Prepare 10-K draft.	5.60	4,620.00
01/17/24	Spreen, Janet A.	Call with working group regarding 10-K.	1.00	825.00
01/17/24	Stevenson, Brittany E.	Review and update Form 10-K.	3.30	1,468.50

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Date	Name	Description	Hours	Amount
01/17/24	Stevenson, Brittany E.	Review share deferral elections and share ownership records.	1.60	712.00
01/18/24	Gunther, Michael W.	Draft 10-k bios for new directors and officers.	1.70	646.00
01/18/24	Rodriguez, Jennifer R.	Research questions relating to disclosure of director and officer indemnity in 10-K.	2.40	2,364.00
01/18/24	Spreen, Janet A.	Prepare 10-K draft.	4.00	3,300.00
01/18/24	Spreen, Janet A.	Attention to review of questionnaires.	0.70	577.50
01/18/24	Stevenson, Brittany E.	Review and update Form 10-K.	5.90	2,625.50
01/19/24	Gunther, Michael W.	Draft 10-k bios for new directors and officers.	1.90	722.00
01/19/24	Spreen, Janet A.	Attention to 10-K matters.	0.70	577.50
01/19/24	Stevenson, Brittany E.	Attend call with Mr. Gunther to discuss director and officer biographies.	0.50	222.50
01/19/24	Stevenson, Brittany E.	Review and update Form 10-K.	3.80	1,691.00
01/20/24	Stevenson, Brittany E.	Review and update Form 10-K.	3.10	1,379.50
01/21/24	Stevenson, Brittany E.	Review and update Form 10-K.	3.10	1,379.50
01/22/24	Spreen, Janet A.	Prepare and update 10-K.	3.00	2,475.00
01/22/24	Spreen, Janet A.	Prepare DTC Indemnity Letter.	1.30	1,072.50
01/22/24	Stevenson, Brittany E.	Review and update Form 10-K.	3.10	1,379.50
01/23/24	Gunther, Michael W.	Track and review for completeness the Director and Officer questionnaires.	1.20	456.00
01/23/24	Spreen, Janet A.	Attention to Broadridge questions.	0.20	165.00
01/23/24	Spreen, Janet A.	Attention to DTC letter request.	0.30	247.50
01/23/24	Spreen, Janet A.	Attend 10-K meeting.	0.60	495.00
01/23/24	Spreen, Janet A.	Review and revise risk factors and related matters for Form 10-K.	3.50	2,887.50

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Date	Name	Description	Hours	Amount
01/23/24	Spreen, Janet A.	Assemble sections for equity review and update and circulate same.	1.00	825.00
01/23/24	Stevenson, Brittany E.	Review completed director and officer questionnaires.	0.50	222.50
01/23/24	Stevenson, Brittany E.	Attend call to discuss Form 10-K.	0.60	267.00
01/24/24	Gunther, Michael W.	Correspondence regarding 10-k bios and warrant holders list.	0.10	38.00
01/24/24	Gunther, Michael W.	Update questionnaire tracker to reflect Mr. Hightower's responses.	0.40	152.00
01/24/24	Spreen, Janet A.	Attention to 10-K questions and updates.	2.00	1,650.00
01/24/24	Spreen, Janet A.	Attention to identifying potential remaining parties to registration rights agreement for waiver.	0.80	660.00
01/24/24	Spreen, Janet A.	Attention to potential 8-K for plan update.	1.00	825.00
01/24/24	Stevenson, Brittany E.	Review completed director and officer questionnaires.	0.50	222.50
01/25/24	Gunther, Michael W.	Draft 10-K biography for Mr. Gallagher and update questionnaire tracker accordingly.	0.70	266.00
01/25/24	Gunther, Michael W.	Check shareholder list and Warrantholder list for discrepancies.	0.40	152.00
01/25/24	Spreen, Janet A.	Attention to 10-K updates and related calls.	5.00	4,125.00
01/25/24	Spreen, Janet A.	Attention to emergence tasks.	1.70	1,402.50
01/25/24	Stevenson, Brittany E.	Review and update Form 10-K.	1.70	756.50
01/25/24	Stevenson, Brittany E.	Call with Ms. Spreen to discuss Form 10-K.	0.30	133.50
01/25/24	Stevenson, Brittany E.	Attend call to discuss Form 10-K updates.	0.40	178.00
01/26/24	Spreen, Janet A.	Attention to registration rights party list and other emergence items.	0.80	660.00
01/26/24	Spreen, Janet A.	Review and revise Part III and other 10-K information.	2.00	1,650.00

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Houston
Wilmington

Date	Name	Description	Hours	Amount
01/26/24	Stevenson, Brittany E.	Review and update Form 10-K.	7.40	3,293.00
01/27/24	Spreen, Janet A.	Review comments on Disclosure Controls section for 10-K.	0.50	412.50
01/27/24	Spreen, Janet A.	Attention to emergence steps for notifications.	0.50	412.50
01/27/24	Spreen, Janet A.	Review and revise Part III information and circulate for review.	1.30	1,072.50
01/28/24	Spreen, Janet A.	Address 10-K questions.	0.30	247.50
01/29/24	Spreen, Janet A.	Attention to Form 8-K for Second Modified Plan Filing.	2.00	1,650.00
01/29/24	Spreen, Janet A.	Attention to 10-K matters.	0.50	412.50
01/30/24	Gunther, Michael W.	Review new questionnaire responses.	0.10	38.00
01/30/24	Leonard, Melissa A.	Attention to 8-K.	0.50	325.00
01/30/24	Leonard, Melissa A.	Attention to 10-K.	1.00	650.00
01/30/24	Spreen, Janet A.	Attention to 10-K matters.	3.50	2,887.50
01/30/24	Spreen, Janet A.	Attention to Form 8-K for Second Modified Plan Filing.	1.00	825.00
01/30/24	Stevenson, Brittany E.	Review Form 10-K.	0.20	89.00
01/30/24	Stevenson, Brittany E.	Attend call with Ms. Spreen to discuss Form 10-K.	0.20	89.00
01/30/24	Stevenson, Brittany E.	Attend call to discuss Form 10-K.	0.30	133.50
01/31/24	Gunther, Michael W.	Update tracker to reflect questionnaire responses of Ms. Bell and Ms. Reiss.	0.40	152.00
01/31/24	Spreen, Janet A.	Attention to Form 8-K for Second Modified Plan Filing and updates to plan.	1.00	825.00
01/31/24	Spreen, Janet A.	Attention to 10-K comments and revisions.	7.30	6,022.50
01/31/24	Spreen, Janet A.	Prepare board minutes.	0.50	412.50
01/31/24	Stevenson, Brittany E.	Review completed director and officer	0.40	178.00

Baker & Hostetler LLP

Date	Name	Description	Hours	Amount
		questionnaires.		
01/31/24	Stevenson, Brittany E.	Prepare and distribute written consent for signature.	0.40	178.00
	Total		187.10	128,792.50