

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Objection Deadline: April 29, 2024, at 4:00 p.m. (ET)

SUMMARY COVER SHEET OF EIGHTH MONTHLY APPLICATION OF
WHITE & CASE LLP FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
FEBRUARY 1, 2024 TO AND INCLUDING FEBRUARY 29, 2024

Name of Applicant:	White & Case LLP
Authorized to Provide Professional Services to:	Debtors and Debtors-in-Possession
Date of Retention:	Effective June 27, 2023
Period for Which Compensation and Reimbursement Are Requested:	February 1, 2024 – February 29, 2024
Total Amount of Compensation (100%):	\$858,338.00
Amount of Compensation Requested (80%):	\$686,670.40
Amount of Compensation Held Back (20%):	\$171,667.60
Amount of Expense Reimbursement Requested:	\$4,193.42
Aggregate Amount to be Paid Under Compensation Procedures Order:	\$690,863.82

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 is 27000 Hills Tech Ct., Farmington Hills, MI 48331.



MONTHLY FEE APPLICATIONS FILED

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
		Requested		Approved On Monthly Basis		Holdback On Monthly Basis		Total Approved By Interim Order	
Date; D.I.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses	Fees	Expenses
9/13/2023 D.I. 422	6/27/2023 – 7/31/2023	\$2,296,617.00	\$4,880.64	\$1,837,293.60	\$4,880.64	\$459,323.40	\$0.00	\$2,296,617.00	\$4,880.64
10/20/2023 D.I. 594	8/1/2023 – 8/31/2023	\$1,923,539.00	\$4,149.65	\$1,538,831.20	\$4,149.65	\$384,707.80	\$0.00	\$1,923,539.00	\$4,149.65
11/10/2023 D.I. 684	9/1/2023 – 9/30/2023	\$1,313,604.00	\$36.58	\$1,050,883.20	\$36.58	\$262,720.80	\$0.00	\$1,313,604.00	\$36.58
11/30/2023 D.I. 762	10/1/2023 – 10/31/2023	\$1,654,153.00	\$3,903.33	\$1,323,322.40	\$3,903.33	\$330,830.60	\$0.00	\$1,654,153.00	\$3,903.33
1/12/2024 D.I. 912	11/1/2023 – 11/30/2023	\$989,463.00	\$0.00	\$791,570.40	\$0.00	\$197,892.60	\$0.00	\$989,463.00	\$0.00
2/13/2024 D.I. 967	12/1/2023 – 12/31/2023	\$692,738.00	\$4,504.73	\$554,190.40	\$4,504.73	\$138,547.60	\$0.00	\$692,738.00	\$4,504.73
3/14/2024 D.I. 1099	1/1/2024 – 1/31/2024	\$661,229.00	\$608.60	\$528,983.20	\$608.60	\$132,245.80	\$0.00	TBD	TBD

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

Name	Title	Year Admitted	Areas of Expertise	Hours	Rate	Fees
Ericksen, A.J.	Partner	2005	Securities Practice	3.5	\$1,720.00	\$6,020.00
He, Fan	Counsel	2007	Financial Restructuring & Insolvency (FRI) Practice	26.7	\$1,470.00	\$39,249.00
Hirshorn, Deanna	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	5.7	\$450.00	\$2,565.00
Kagay, Sally	Associate	2022	Commercial Litigation Practice	4.7	\$1,110.00	\$5,217.00
Kampfner, Roberto	Partner	1995	Financial Restructuring & Insolvency (FRI) Practice	90.8	\$1,900.00	\$172,520.00
Kim, Doah	Associate	2012	Financial Restructuring & Insolvency (FRI) Practice	56.2	\$1,430.00	\$80,366.00
Ludovici, Stephen	Associate	2014	Financial Restructuring & Insolvency (FRI) Practice	11.5	\$1,380.00	\$15,870.00
Mezei, Livy	Associate	2017	Financial Restructuring & Insolvency (FRI) Practice	8.9	\$1,160.00	\$10,324.00
Pryor, Gregory	Partner	1989	M&A - Corporate Practice	1.1	\$2,150.00	\$2,365.00
Szuba, RJ	Associate	2017	Financial Restructuring & Insolvency (FRI) Practice	121.8	\$1,290.00	\$157,122.00
Turetsky, David	Partner	2003	Financial Restructuring & Insolvency (FRI) Practice	156.8	\$1,900.00	\$297,920.00
Zakia, Jason	Partner	1999	Commercial Litigation Practice	34.4	\$2,000.00	\$68,800.00
Grand Total				522.1		\$858,338.00

STATEMENT OF FEES AND HOURS BY PROJECT CATEGORY

Cat. No.	Project Category Description	Total Hours	Total Fees
B01	Asset Analysis, Sale & Disposition	0.0	\$0.00
B02	Automatic Stay Issues	0.0	\$0.00
B03	Avoidance Actions & Other Asset Recovery	0.0	\$0.00
B04	Business Operations, Vendor & Utility Issues	0.0	\$0.00
B05	Case Administration	8.1	\$6,085.00
B06	Case Strategy	0.0	\$0.00
B07	Claims Administration & Objections	92.6	\$158,223.00
B08	Corporate Advice & Board Meetings	1.6	\$2,918.00
B09	Creditor Meetings & Statutory Committees	0.0	\$0.00
B10	Disbursement	0.0	\$0.00
B11	Discovery	0.0	\$0.00
B12	Exclusivity, Plan & Disclosure Statement	363.8	\$601,463.00
B13	Executory Contracts & Unexpired Leases	4.2	\$6,198.00
B14	First Day Pleadings	0.0	\$0.00
B15	Hearings & Court Matters	3.3	\$4,754.00
B16	Insurance Issues	0.8	\$1,337.00
B17	Litigation	3.1	\$6,030.00
B18	Nonworking Travel	0.0	\$0.00
B19	Professional Retention & Fees – W&C	10.7	\$15,442.00
B20	Professional Retention & Fees – Other	2.1	\$2,898.00
B21	Reports, Schedules & U.S. Trustee Issues	31.8	\$52,990.00
B22	Tax Issues	0.0	\$0.00
B23	Employee Issues	0.0	\$0.00
Grand Total		522.1	\$858,338.00

EXPENSE SUMMARY

Description	Amount
Deposition Transcripts	\$4,193.42
Grand Total	\$4,193.42

**IN THE UNITED STATES BANKRUPTCY COURT
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In re

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Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Objection Deadline: April 29, 2024, at 4:00 p.m. (ET)

**EIGHTH MONTHLY APPLICATION OF WHITE & CASE LLP FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FEBRUARY 1, 2024 TO AND INCLUDING FEBRUARY 29, 2024**

White & Case LLP (“**White & Case**”), counsel for the debtors and the debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, hereby files this eighth monthly application (this “**Application**”) for the period from February 1, 2024 to and including February 29, 2024 (the “**Compensation Period**”) requesting (a) interim allowance and payment of compensation for professional services to the Debtors in the amount of \$686,670.40, representing 80% of the \$858,338.00 of fees earned by White & Case for professional services to the Debtors during the Compensation Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by White & Case during the Compensation Period in connection with such services in the amount of \$4,193.42. In support of this Application, White & Case respectfully represents as follows:

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 is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

JURISDICTION, VENUE AND PREDICATES FOR RELIEF

1. This Court has jurisdiction to consider this Application under 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, dated February 29, 2012 (Sleet, C.J.). This is a core proceeding under 28 U.S.C. § 157(b). Venue of the Chapter 11 Cases and this Application is proper in this District under 28 U.S.C. §§ 1408 and 1409.

2. The predicates for the relief requested by this Application are sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), rule 2016 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* [Docket No. 181] (the “**Compensation Procedures Order**”).

BACKGROUND

3. On June 27, 2023 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (collectively, the “**Chapter 11 Cases**”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). Prior to the Effective Date, the Debtors continued to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On July 11, 2023, the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed the official committee of unsecured creditors (the “**Creditors’ Committee**”) for these Chapter 11 Cases. On September 7, 2023, the U.S. Trustee appointed the official committee of equity security holders (the “**Equity Committee**”).

and collectively with the Creditors' Committee, the "**Committees**") for these Chapter 11 Cases. No trustee or examiner has been appointed in these Chapter 11 Cases.

4. The Court has authorized the Debtors to retain and employ White & Case as their lead bankruptcy counsel, effective as of the Petition Date, pursuant to the *Order Authorizing the Employment and Retention of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date* [Docket No. 175] (the "**Retention Order**"). The Retention Order authorizes the Debtors to compensate and reimburse White & Case in accordance with the terms and conditions set forth in the Debtors' application to retain White & Case, subject to White & Case's application to the Court.

5. On July 25, 2023, the Court entered the Compensation Procedures Order, which provides, among other things, that each chapter 11 professional seeking interim compensation in the Chapter 11 Cases 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 Compensation Procedures 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 Monthly Fee Application; and (ii) 80 percent (80%) of the fees and 100 percent (100%) of the expenses not subject to an objection.

6. On March 6, 2024, the Court entered the *Order (I) Confirming Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors and (II) Granting Related Relief* [Docket No. 1069].

7. On March 14, 2024, the Effective Date under the Plan occurred.

RELIEF REQUESTED

8. By this Application, in accordance with the Compensation Procedures Order, White & Case requests payment in the aggregate amount of \$690,863.82, which is equal to (a) 80% of the \$858,338.00 of fees earned by White & Case for professional services to the Debtors during the Compensation Period; and (b) 100% of the \$4,193.42 of actual and necessary expenses incurred by White & Case during the Compensation Period in connection with its services to the Debtors.

SUMMARY OF SERVICES RENDERED

9. Prior to filing this Application, White & Case reviewed its fees worked (which totaled 569.9 hours and \$923,656.00) and expenses incurred (which totaled \$4,193.42). Following that review, White & Case voluntarily elected to reduce its fees by 47.8 hours (~8.4%) and \$65,318.00 (~7.1%). White & Case will not hereafter seek payment for the fees that it has voluntarily reduced.

10. Attached hereto as **Exhibit A** is a detailed statement of White & Case's hours expended and fees earned during the Compensation Period. A summary of White & Case's hours expended and fees earned during the Compensation Period grouped by category (discussed below) is in the summary cover sheets prefixed to this Application. The attorneys and paraprofessionals who provided services to the Debtors during the Compensation Period are also identified in **Exhibit A** and in the summary cover sheets. The services rendered by White & Case during the

Compensation Period are grouped into the categories set forth in **Exhibit A** and in the summary cover sheets prefixed to this Application. The following is a brief narrative summary of the services performed by White & Case professionals and paraprofessionals on behalf of the Debtors during the Compensation Period, organized by category:

No.	Category Name
	Brief Narrative Summary
B01	Asset Analysis, Sale & Disposition
	During the Compensation Period, White & Case billed no time to this project category.
B02	Automatic Stay Issues
	During the Compensation Period, White & Case billed no time to this project category.
B03	Avoidance Actions & Other Asset Recovery
	During the Compensation Period, White & Case billed no time to this project category.
B04	Business Operations, Vendor & Utility Issues
	During the Compensation Period, White & Case billed no time to this project category.
B05	Case Administration
	During the Compensation Period, White & Case professionals and paraprofessionals worked on various matters related to the management of these Chapter 11 Cases, including addressing certain client inquiries, monitoring the docket, reviewing the data room, and addressing and monitoring work in progress.
B06	Case Strategy
	During the Compensation Period, White & Case billed no time to this project category.
B07	Claims Administration & Objections
	During the Compensation Period, White & Case attorneys advised the Debtors with respect to various matters concerning claims and the claims administration process, including assisting the Debtors and their professionals in their analysis of both disputed and undisputed claims, as well as developing, negotiating, and reaching agreement with each of the Committees on proposals regarding the claims reserve, mechanics concerning reduction of the claims reserve following the effectiveness of the Plan, and related matters. Furthermore, White & Case advised the Debtors in connection with certain potential claims, including the investigation into derivative claims, the SEC claim and the consensual resolution of same, the consensual resolution of the Ohio securities class action,

	matters concerning certain indemnification claims, and certain other matters concerning the claims that were filed against the Debtors. Lastly, White & Case created exhibits for the confirmation hearing related to the claims reserve.
B08	Corporate Advice & Board Meetings
	During the Compensation Period, White & Case professionals advised the Debtors in connection with certain matters relating to board meetings and corporate governance, including preparing talking points and advising the Debtors in connection with such matters.
B09	Creditor Meetings & Statutory Committees
	During the Compensation Period, White & Case billed no time to this project category.
B10	Disbursement
	During the Compensation Period, White & Case billed no time to this project category.
B11	Discovery
	During the Compensation Period, White & Case billed no time to this project category.
B12	Exclusivity, Plan & Disclosure Statement
	During the Compensation Period, White & Case continued to advise the Debtors in connection with issues concerning the Debtors' chapter 11 plan and proposed confirmation order, including plan confirmation strategy matters, certain Plan settlement matters, and resolutions of plan issues raised by certain constituents, including the Committees, the Ohio Plaintiffs, Foxconn, DiamondPeak directors, and the SEC. Additionally, White & Case advised the Debtors in connection with responding to and attempting to resolve informal plan comments and objections, and conferred with the Committees to discuss and work to resolve their plan issues. White & Case continued to draft a brief in support of confirmation and drafted declarations in support of plan confirmation. White & Case reviewed and resolved comments relating to the proposed confirmation order from various stakeholders, including the Debtors. White & Case also finalized the Debtors' reply in support of the Debtors' second exclusivity motion and reply section of the confirmation brief. White & Case drafted a voting report and voting declaration for the confirmation hearing. Lastly, White & Case prepared and revised documents to be included in an amendment to the Plan Supplement.
B13	Executory Contracts & Unexpired Leases
	During the Compensation Period, White & Case advised the Debtors on issues related to the Debtors' assumption and/or rejection of executory contracts and unexpired leases, including security deposits, and reviewing motions to extend the removal period and assume leases.

B14	First Day Pleadings
	During the Compensation Period, White & Case billed no time to this project category.
B15	Hearings & Court Matters
	During the Compensation Period, White & Case prepared for and attended a hearing on February 22, 2024 and prepared for the confirmation hearing in March.
B16	Insurance Issues
	During the Compensation Period, White & Case professionals advised the Debtors in connection with certain D&O insurance issues, including analyzing director & officer insurance issues.
B17	Litigation
	During the Compensation Period, White & Case advised the Debtors regarding certain pending litigation matters, including a settlement of the DiamondPeak litigation.
B18	Nonworking Travel
	During the Compensation Period, White & Case billed no time to this project category.
B19	Professional Retention & Fees – W&C
	During the Compensation Period, White & Case worked on preparing its monthly fee applications for December and January, and worked on an interim fee application.
B20	Professional Retention & Fees – Other
	During the Compensation Period, White & Case assisted its co-advisors with respect to its fee applications.
B21	Reports, Schedules & U.S. Trustee Issues
	During the Compensation Period, White & Case advised the Debtors in connection with aspects of the Debtors' public securities filings, including certain bankruptcy issues relating to such filings.
B22	Tax Issues
	During the Compensation Period, White & Case billed no time to this project category.
B23	Employee Issues
	During the Compensation Period, White & Case billed no time to this project category.

11. White & Case attorneys and paraprofessionals billed a total of 522.1 hours for which White & Case seeks compensation in connection with these Chapter 11 Cases during the

Compensation Period. All services rendered by White & Case for which compensation is sought pursuant to this Application were rendered solely to or on behalf of the Debtors. No payments were received by White & Case from any other source for services rendered or to be rendered in connection with these Chapter 11 Cases.

ACTUAL AND NECESSARY EXPENSES

12. Attached as **Exhibit B** is a detailed statement of White & Case's out-of-pocket expenses incurred during the Compensation Period for \$4,193.42 for deposition expenses that occurred during an earlier compensation period and have now been processed by the firm's accounting department.

VALUATION OF SERVICES

13. As noted above, the amount of time spent by each White & Case attorney and paraprofessional providing services to the Debtors during the Compensation Period is set forth in the summary cover sheets hereto. The rates reflected thereon are White & Case's customary hourly rates for work of this character.² The reasonable value of the services rendered by White & Case for which White & Case seeks compensation for the Compensation Period as attorneys to the Debtors in these Chapter 11 Cases is \$858,338.00. The blended rate for compensation requested in this Application is approximately \$1,644.³

14. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the fees requested are fair and reasonable given (a) the complexity of these Chapter 11 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.

² This Monthly Fee Application reflects White & Case's customary annual rate increases effective January 1, 2024.

³ The blended rate is calculated by taking the total of fees included in this Monthly Fee Application and dividing by the total of hours included in this Monthly Fee Application, rounded to the nearest dollar.

15. Although White & Case has made every effort to include all fees earned and expenses incurred during the Compensation Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Compensation Period. White & Case reserves the right to make further applications to this Court for allowance of such fees and expenses not included herein. Subsequent fee applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Compensation Procedures Order. For similar reasons, some of the fees and expenses requested in this Application may have been earned or incurred before the Compensation Period.

CERTIFICATION OF COMPLIANCE

16. The undersigned has reviewed the requirements of Local Rule 2016-2 and certifies that, to the best of his knowledge, information, and belief, this Application complies with the requirements of that Local Rule.

WHEREFORE, White & Case requests allowance and payment of the aggregate amount of \$690,863.82, which is equal to (a) 80% of the \$858,338.00 of fees earned by White & Case for professional services to the Debtors during the Compensation Period; and (b) 100% of the \$4,193.42 of actual and necessary expenses incurred by White & Case during the Compensation Period in connection with its services to the Debtors.

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Dated: April 8, 2024

Respectfully submitted,

/s/David M. Turetsky

WHITE & CASE LLP

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*Co-Counsel to Debtors and
Debtors-in-Possession*

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Debtors.

Chapter 11

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(Jointly Administered)

Objection Deadline: April 29, 2024, at 4:00 p.m. (ET)

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FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD FROM
FEBRUARY 1, 2024 TO AND INCLUDING FEBRUARY 29, 2024**

PLEASE TAKE NOTICE that White & Case LLP (the “**Applicant**”) has today filed the attached *Eighth Monthly Application of White & Case LLP for Allowance of Compensation and Reimbursement of Expenses for the Period from February 1, 2024 to and Including February 29, 2024* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801 (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that 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

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cases (collectively, the “**Debtors**”), (i) White & Case LLP, 200 South Biscayne Boulevard, Suite 4900, Miami, FL 33131 (Attn: Thomas E Lauria (tlauria@whitecase.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), Doah Kim (doah.kim@whitecase.com), and RJ Szuba (rj.szuba@whitecase.com)); (b) proposed 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. Fournier (david.fournier@troutman.com), and Tori L. Remington (tori.remington@troutman.com)); (ii) Troutman Pepper Hamilton Sanders LLP, 3000 Two 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) 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@usdoj.gov)); and (e) 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 Bennett S. Silverberg (bsilverberg@brownrudnick.com)); (ii) Brown Rudnick LLP, One Financial Center, Boston, MA 02111 (Attn: Matthew A. Sawyer (msawyer@brownrudnick.com)); and (iii) Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, DE 19801 (Attn: Eric J. Monzo (emonzo@morrisjames.com) and Brya M. Keilson (bkeilson@morrisjames.com)) by no later than **4:00 p.m. (Eastern Time) on April 29, 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 Administrative Order and the procedures described herein will be considered by the Bankruptcy Court at such hearing.

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

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Dated: April 8, 2024
Wilmington, Delaware

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Exhibit A

Detailed Statement of Hours and Fees

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

For professional services for the period ending 29 February 2024

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Case Administration				
1 February 2024	Update pleadings file (0.1); update case calendar (0.1).	D Hirshorn	0.20	90.00
2 February 2024	Update pleadings file.	D Hirshorn	0.10	45.00
6 February 2024	Monitor main docket for recent activity (0.1); update pleadings file (0.1); update case calendar (0.1).	D Hirshorn	0.30	135.00
7 February 2024	Call with A. Kroll, M. Port, M. Leonard (Company), A. Crnkovich and E. Hammes (Silverman) re: case developments and issues.	F He	0.50	735.00
7 February 2024	Monitor docket for recent activity; update pleadings file (0.1); update case calendar (0.1).	D Hirshorn	0.20	90.00
8 February 2024	Monitor docket for recent activity.	D Hirshorn	0.10	45.00
12 February 2024	Update pleadings file (0.1); update case calendar (0.2).	D Hirshorn	0.30	135.00
13 February 2024	Call with D. Turetsky re: case admin issues.	F He	0.20	294.00
14 February 2024	Confer with A. Kroll (Company) re: case admin issues.	F He	0.20	294.00
14 February 2024	Monitor docket for recent activity (0.1); update pleadings file (0.1); update case calendar (0.1).	D Hirshorn	0.30	135.00
15 February 2024	Revise case task list and related matters.	D Kim	0.20	286.00
15 February 2024	Update pleadings file (0.2); update case calendar (0.2).	D Hirshorn	0.40	180.00
21 February 2024	Update case calendar.	D Hirshorn	0.10	45.00
26 February 2024	Review and respond to emails with F. He and R. Szuba re: Intralinks.	D Hirshorn	0.10	45.00
27 February 2024	Confer with D. Hirshorn and E. Hightower (Company) re: data request and uploading VDR in connection with company inquiry.	F He	1.30	1,911.00
27 February 2024	Attempt to extract Intralinks archive from flash drive (0.6); coordinate with J. Larralde and S. Maragh re: extracting archive (0.2); upload archive to secured file share for F. He in connection with company inquiry (1.3).	D Hirshorn	2.10	945.00
28 February 2024	Research patent trolls for L. Mezei (0.5); finish	D Hirshorn	0.90	405.00

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RE: Project Pickup

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	uploading Intralinks materials to secured file share and email client (0.4).			
29 February 2024	Confer with F. He re: Intralinks data room (0.2); review and respond to emails with S. Maragh and F. He re: same (0.1); review data room index and extracted document file for discrepancies (0.3).	D Hirshorn	0.60	270.00
SUBTOTAL: Case Administration			8.10	6,085.00

Claims Administration & Objections

1 February 2024	Call with D. Turetsky (W&C) and B. Silverberg (Brown Rudnick) re: claims reserve issues.	R Kampfner	0.30	570.00
1 February 2024	Call with R. Kampfner (W&C) and B. Silverberg (Brown Rudnick) re: claims reserve issues (0.3); emails to F. Lawall (Troutman) and D. Kovsky (Troutman) re: claims reserve issues (0.3); further analysis re: claims reserve issues (0.2); emails to F. He (W&C) re: claims reconciliation issues (0.1); review/analysis re: Creditors' Committee claims reserve proposal (0.2); call with F. He (W&C) re: claims reconciliation issues (0.1); further analysis re: SEC claim settlement issues (0.4); calls with J. Zakia (W&C) re: SEC settlement issues (0.3); emails to S. Peikin (S&C) and J. Croke (S&C) re: SEC settlement issues (0.2).	D Turetsky	2.10	3,990.00
1 February 2024	Confer with D. Turetsky re: claims issues.	F He	0.10	147.00
1 February 2024	Draft summary of settlement and stipulation for certification of counsel re: 7023 stipulation (0.5); draft correspondence to R. Kampfner re: same (0.1); prepare 7023 stipulation for filing (0.2).	R Szuba	0.80	1,032.00
2 February 2024	Call with D. Turetsky (W&C) re: claims reserve issues (0.8); emails with D. Turetsky (W&C) re: claims reserve issues (0.1); continued work on claims reserve issues with Creditors' Committee (1.1).	R Kampfner	2.00	3,800.00
2 February 2024	Emails to S. Peikin (S&C) and J. Croke (S&C) re: SEC settlement issues (0.3); calls with J. Zakia (W&C) re: SEC settlement issues (0.2); call with R. Kampfner (W&C) re: claims reserve issues (0.8); emails to R. Kampfner (W&C) re: claims reserve issues (0.1); email (0.1) and calls with A. Kroll (Lordstown) re: claims reserve issues (0.1); further analysis re: SEC settlement issues (0.2); further analysis re: claims reserve issues (0.4).	D Turetsky	2.20	4,180.00
2 February 2024	Revise COC re: order approving Rule 7023 stipulation with Ohio Securities Lead Plaintiff (0.2); correspond with R. Szuba, M. Patterson (WBD) re: filing of same (0.1).	D Kim	0.30	429.00
2 February 2024	Draft correspondence to D. Baddley re: non-dischargeability motion.	R Szuba	0.20	258.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
3 February 2024	Calls with R. Kampfner (W&C) re: claims reserve issues (0.3); further analysis re: claims reserve issues (0.2).	D Turetsky	0.50	950.00
5 February 2024	Confer with SEC re: SEC claim settlement (0.5); follow up with client re: same (0.3), confer with D. Turetsky re: SEC settlement issues (0.4).	J Zakia	1.20	2,400.00
5 February 2024	Calls with D. Turetsky (W&C) re: claims reserve issues (0.2) and re: Ohio litigation settlement issues (0.1).	R Kampfner	0.30	570.00
5 February 2024	Emails to S. Peikin (S&C) re: SEC settlement issues (0.2); call with D. Ninivaggi (Lordstown) re: SEC settlement issues (0.2); emails to F. He (W&C) re: claim issues (0.2); calls with J. Zakia (W&C) re: SEC settlement issues (0.4); call with M. Patterson (Womble) re: Ohio litigation 7023 matters (0.1); calls with R. Kampfner (W&C) re: claims reserve issues (0.2) and re: Ohio litigation settlement issues (0.1); email to B. Silverberg (Brown Rudnick) re: Ohio litigation 7023 stipulation issues (0.1); further analysis re: SEC settlement issues (0.8); further analysis re: claims reserve issues (0.2).	D Turetsky	2.50	4,750.00
5 February 2024	Analysis re: issues concerning certain claims (0.4); confer with A. Crnkovich (Silverman) re: same (0.3); confer with T. Constadinos (Silverman) re: claim issues (0.3).	F He	1.00	1,470.00
6 February 2024	Confer with D. Turetsky re: SEC claim settlement issues.	J Zakia	0.10	200.00
6 February 2024	Call with D. Turetsky (W&C) re: claims reserve issues (0.5); call with R. Szuba re: allowed claims (0.1); further confer with R. Szuba re: same (0.2); attend calls with Creditors' Committee and R. Szuba (partial) re: claims reserve issues (1.0).	R Kampfner	1.80	3,420.00
6 February 2024	Calls with J. Zakia (W&C) re: SEC settlement issues (0.1); call with R. Kampfner (W&C) re: claims reserve issues (0.5); further analysis re: claims reserve issues (0.2); emails to R. Szuba (W&C) re: reserve issues (0.2).	D Turetsky	1.00	1,900.00
6 February 2024	Call with R. Kampfner re: allowed claims (0.1); correspond with F. He and Silverman re: same (0.1); review undisputed claims analysis (0.3); draft analysis and correspondence to D. Turetsky and R. Kampfner re: same (0.2); draft correspondence to Silverman re: same (0.1); draft correspondence to D. Turetsky and R. Kampfner re: Claims Reserve (0.1); call with counsel to Creditors' Committee re: claims reserve (0.2); confer with R. Kampfner re: claims reserve with respect to GUC claims (0.1); review claims reserve backup (0.1); call with counsel to Foxconn re: preferred stock trading restrictions (0.2); call with A. Crnkovich and C. Tsitsis re: claims reserve amounts (0.2); review claims reserve backup (0.2); further confer with R. Kampfner re: same (0.2).	R Szuba	2.10	2,709.00

WHITE & CASE

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
7 February 2024	Confer with D. Turetsky re: claims issues (0.2); confer with R. Szuba re: claims issues (0.2).	R Kampfner	0.40	760.00
7 February 2024	Calls with R. Kampfner (W&C) re: claim reserve issues (0.2); further analysis re: SEC settlement issues (0.4); call with J. Zakia (W&C) re: SEC settlement issues (0.1); review and analyze claims reconciliation tracker (0.2); emails to R. Szuba (W&C) re: claims issues (0.1); call with F. He (W&C) re: claims issues (0.1).	D Turetsky	1.10	2,090.00
7 February 2024	Confer with D. Turetsky re: claims issues (0.1); review claim reserve material (0.2); confer with A. Crnkovich (Silverman) re: same (0.3); review revised material (0.3); confer with R. Szuba re: same (0.3); call with R. Szuba and A. Crnkovich (Silverman) re: issues with claim reserve material (0.4).	F He	1.60	2,352.00
7 February 2024	Draft correspondence to D. Turetsky re: claim amounts and undisputed claims list (0.2); review claims reserve analysis (0.1); call with D. Turetsky re: claims (0.1); review claims disallowance analysis re: general unsecured claims reserve (0.3); call with F. He re: same (0.3); call with F. He and A. Crnkovich re: same (0.4); revise claims disallowance analysis re: general unsecured claims reserve (0.9); draft correspondence to C. Tsitsis and A. Crnkovich re: same (0.3); confer with R. Kampfner re: same (0.2); draft correspondence and analysis to R. Kampfner and D. Turetsky re: claims issues (1.2); draft correspondence to counsel to Creditors' Committee re: same (0.2); attend call with F. Lawall (UCC) and R. Kampfner re: plan and claims reserve analysis (0.4); further revise documents with respect to same (0.4).	R Szuba	5.00	6,450.00
8 February 2024	Confer with Equity Committee counsel re: D&O indemnification claims (0.9), review/analysis re: issues concerning indemnification claims (1.8); confer with directors' counsel re: indemnification claims (0.7).	J Zakia	3.40	6,800.00
8 February 2024	Continued work on disputes between Creditors' Committee and Equity Committee (1.4); call with D. Turetsky re: claim reserve issues (0.1).	R Kampfner	1.50	2,850.00
8 February 2024	Further analysis re: claims reserve issues (0.2); emails to R. Kampfner (W&C) and R. Szuba (W&C) re: claims reserve issues (0.1); calls with R. Kampfner (W&C) re: claims reserve issues (0.1).	D Turetsky	0.40	760.00
8 February 2024	Draft correspondence with A. Crnkovich and Silverman team re: asserted claims list and waterfall (0.3); draft correspondence to A. Kroll re: asserted claims detail (0.3); draft correspondence to D. Turetsky and R. Kampfner re: same (0.2); draft correspondence to Equity Committee re: same (0.1); draft correspondence to Creditors' Committee re: same (0.2).	R Szuba	1.10	1,419.00
9 February 2024	Confer with directors' counsel re: indemnification claims.	J Zakia	0.30	600.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
9 February 2024	Review/analysis spread sheet to send to Creditors' Committee with list of liquidated disputed claims.	R Kampfner	0.20	380.00
9 February 2024	Emails to R. Kampfner (W&C) re: claims reserve issues (0.1); call with D. Kovsky (Troutman) re: claim reserve issues (0.2); emails to R. Szuba (W&C) re: claim reconciliation issues (0.1).	D Turetsky	0.40	760.00
9 February 2024	Review issues re: asserted claims detail.	R Szuba	0.30	387.00
10 February 2024	Confer with directors' counsel re: indemnification claims.	J Zakia	0.50	1,000.00
10 February 2024	Confer with D. Turetsky re: claims reserve issues.	R Kampfner	0.20	380.00
10 February 2024	Call with R. Kampfner (W&C) re: claim reserve issues.	D Turetsky	0.20	380.00
12 February 2024	Review reserve language for Plan (0.7); calls with D. Turetsky (W&C) re: claim reserve issues (0.2); attend call with R. Szuba, D. Kovsky, and F. Lawall re: claims reserve (0.2).	R Kampfner	1.10	2,090.00
12 February 2024	Calls with R. Kampfner (W&C) re: claim reserve issues.	D Turetsky	0.20	380.00
12 February 2024	Review correspondence to counsel to Creditors' Committee re: claims reserve agreement (0.2); attend call with R. Kampfner, D. Kovsky, and F. Lawall re: claims reserve (0.2); review issues re: same (0.3).	R Szuba	0.70	903.00
13 February 2024	Draft reserve resolution provision in connection with Equity Committee comments.	R Kampfner	0.30	570.00
13 February 2024	Email to M. DiRisio (Winston) re: derivative claim investigation issues (0.1); further analysis re: D&O claim issues (0.3); analysis re: landlord claim issues in connection with inquiry from Lordstown (0.1); email to M. Port (Lordstown) and A. Kroll (Lordstown) re: landlord claim issues (0.1).	D Turetsky	0.60	1,140.00
14 February 2024	Confer with D. Turetsky re: SEC settlement issues.	J Zakia	0.10	200.00
14 February 2024	Emails to M. DiRisio (Winston) re: derivative claim issues (0.1); email to D. Kovsky (Troutman) and F. Lawall (Troutman) re: derivative claim issues (0.1); review SEC offer comments (0.1); emails to S. Peikin (S&C) re: same (0.1); call with J. Zakia (W&C) re: same (0.1); further research/analysis re: D&O indemnification claims (1.1).	D Turetsky	1.60	3,040.00
14 February 2024	Draft and review correspondence to Fiberdyne re: Fiberdyne claim (0.1); draft correspondence to D. Turetsky and R. Kampfner re: same (0.1); draft correspondence to S. Dwoskin re: claims reserve issues (0.1); revise Plan and confirmation order language re: same (0.4); draft correspondence to R. Kampfner re: same (0.1); draft correspondence to J.	R Szuba	1.10	1,419.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Zakia re: settlement notice issue (0.1); draft correspondence to KCC team re: Ohio Settlement obligations (0.2).			
15 February 2024	Confer with client re: Diamond Peak director indemnification claims (0.3), confer with Equity Committee counsel re: Diamond Peak claims (0.2), confer with directors' counsel re: Diamond Peak claims (0.4).	J Zakia	0.90	1,800.00
15 February 2024	Calls with D. Turetsky re: claims reserve issues (0.3) and director claim issues (0.1); attend call with Mr. Silverberg re: same (0.5).	R Kampfner	0.90	1,710.00
15 February 2024	Emails to J. Zakia (W&C) re: director indemnification claim issues (0.2); email to D. Kovsky (Troutman) and F. Lawall (Troutman) re: SEC offer (0.1); email to Brown Rudnick (B. Silverberg, S. Dwoskin, and others) re: SEC settlement (0.1); review proposed reserve language from Equity Committee (0.1); email to R. Kampfner (W&C) re: Equity Committee reserve language (0.1); calls with R. Kampfner (W&C) re: claims reserve issues (0.3) and director claim issues (0.1); emails to R. Szuba (W&C) re: Fiberdyne claim issues (0.1); call with J. Croke (S&C) re: SEC settlement issues (0.1); further research/analysis re: director indemnification claim issues (0.4); further analysis re: claims reserve issues (0.2); further analysis re: SEC settlement issues (0.2).	D Turetsky	2.00	3,800.00
15 February 2024	Draft correspondences to D. Turetsky and R. Kampfner re: Fiberdyne claim (0.1); draft correspondences to counsel to Fiberdyne re: same (0.1); draft correspondence to Womble re: same (0.1); draft correspondence to A. Kroll and M. Leonard re: Ohio Plaintiffs' proposed claims settlement notice information language (0.2).	R Szuba	0.50	645.00
16 February 2024	Call with D. Turetsky (W&C) re: claim reserve issues (0.1); call with Brown Rudnick (B. Silverberg, S. Dwoskin) and D. Turetsky (W&C) re: claims reserve issues (0.6); review and revise Plan reserve insert (0.4).	R Kampfner	1.10	2,090.00
16 February 2024	Call with R. Kampfner (W&C) re: claim reserve issues (0.1); further research/analysis re: claims reserve issues (0.4); call with Brown Rudnick (B. Silverberg, S. Dwoskin) and R. Kampfner (W&C) re: claims reserve issues (0.6).	D Turetsky	1.10	2,090.00
16 February 2024	(Partial) call with R. Kampfner, B. Silverberg, and S. Dwoskin re: reserve.	R Szuba	0.40	516.00
18 February 2024	Confer with client re: Diamond Peak director claim issues (0.5) confer with D. Turetsky re: claims reserve issues (0.2).	J Zakia	0.70	1,400.00
18 February 2024	Calls with J. Zakia (W&C) re: claims reserve issues (0.2); call with D. Ninivaggi (Lordstown) re: claims	D Turetsky	0.70	1,330.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	reserve issues (0.5).			
19 February 2024	Confer with D. Turetsky re: claims reserve issues.	J Zakia	0.40	800.00
19 February 2024	Attend call with Creditors' Committee considering reserve issues (1.0); review and revise reserve insert (1.2); confer with D. Turetsky re: claim reserve issues (0.6).	R Kampfner	2.80	5,320.00
19 February 2024	Calls with J. Zakia (W&C) re: claims reserve issues (0.4); calls with R. Kampfner (W&C) re: claims reserve issues (0.6); call with A. Kroll (Lordstown) re: claims reserve issues (0.1); emails to S. Vasser (Dechert) re: claims reserve issues (0.4); further analysis re: reserve issues (0.3).	D Turetsky	1.80	3,420.00
20 February 2024	Confer with D. Turetsky re: derivative claims issues (0.3); prepare for and participate in meeting with creditor committee counsel and Winston re: derivative claims investigation (0.8); follow up calls with Winston and committee counsel re: same (0.2).	J Zakia	1.30	2,600.00
20 February 2024	Call with Winston (M. DiRisio), Troutman (F. Lawall, D. Kovsky) and W&C (J. Zakia, D. Turetsky) re: derivative claim investigation issues (0.8); confer with R. Szuba re: reserve language for Plan (0.2); call with Equity Committee re: reserve reduction language (0.4); review and revise language and share with Creditors' Committee (0.1).	R Kampfner	1.50	2,850.00
20 February 2024	Prepare for (0.2) and call with Winston (M. DiRisio), Troutman (F. Lawall, D. Kovsky) and W&C (J. Zakia, R. Kampfner) re: derivative claim investigation issues (0.8); calls with J. Zakia (W&C) re: derivative claim issues (0.3).	D Turetsky	1.30	2,470.00
20 February 2024	Review amended claim filed by Ohio Department of Taxation (0.1); correspond with R. Szuba re: same (0.1).	D Kim	0.20	286.00
20 February 2024	Call with counsel to Equity Committee re: claims reserve reduction provisions (0.4); revise reserve language for Plan (0.1); confer with R. Kampfner re: same (0.2); revise Plan and confirmation order re: reserve language (0.2); further revise reserve language for confirmation order insert (0.2); draft correspondence to B. Silverberg and S. Dwoskin re: same (0.2); draft correspondence to D. Kovsky and F. Lawall re: same (0.2); draft correspondence to Company re: same (0.2).	R Szuba	1.70	2,193.00
21 February 2024	Confer with D. Turetsky re: claims reserve strategy (0.5); further confer with R. Kampfner and D. Turetsky re: claims reserve (0.2).	J Zakia	0.70	1,400.00
21 February 2024	Calls with D. Turetsky (W&C) re: claims reserve issues (1.1); further call with J. Zakia (W&C) and D. Turetsky (W&C) re: claims reserve issues (0.2); further analysis/work in connection with resolving claims	R Kampfner	2.70	5,130.00

WHITE & CASE

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	reserve issues (1.4).			
21 February 2024	Calls with J. Zakia (W&C) re: claims reserve issues (0.5); calls with R. Kampfner (W&C) re: claims reserve issues (1.1); calls with D. Ninivaggi (Lordstown) re: claims reserve issues (1.0); email memo to D. Ninivaggi (Lordstown) re: claims reserve issues (0.6); further analysis re: claims reserve issues (1.3); further call with J. Zakia (W&C) and R. Kampfner (W&C) re: claims reserve issues (0.2); further email to D. Ninivaggi (Lordstown) re: claims reserve issues (0.1); emails to R. Szuba (W&C) re: claims reserve issues (0.1); email to A. Kroll (Lordstown) and others re: claims reserve issues (0.2); call with R. Szuba (W&C) re: claims reserve issues (0.2).	D Turetsky	5.30	10,070.00
21 February 2024	Review correspondence from Creditors' Committee re: claims reserve language (0.1); call with D. Turetsky re: claims reserve (0.2); draft correspondence to A. Kroll and Silverman team re: claims reserve exhibit to Plan supplement (0.2); revise same (0.3); review confirmation language re: reserve (0.2); draft correspondence to D. Turetsky and R. Kampfner re: same (0.1); calls with D. Turetsky re: claims reserve language (0.2); draft claims reserve provisions (0.2); draft correspondence to B. Silverberg and S. Dwoskin re: same (0.2); review asserted claims detail (0.2); draft correspondence to D. Turetsky and R. Kampfner re: same (0.4); review claims and supporting documents re: same (0.4); review correspondence from A. Kroll re: same (0.1); further revise asserted claims detail Plan supplement (0.3).	R Szuba	3.10	3,999.00
22 February 2024	Confer with D. Turetsky re: claims reserve issues.	J Zakia	0.20	400.00
22 February 2024	Calls with D. Turetsky (W&C) re: claims reserve issues (0.1); further call with D. Turetsky (W&C) and R. Szuba (W&C) re: claims reserve issues (0.3); review/analysis list of reserve claims (0.7).	R Kampfner	1.10	2,090.00
22 February 2024	Emails to A. Kroll (Lordstown) re: claims reserve issues (0.2); calls with R. Kampfner (W&C) re: claims reserve issues (0.1); call with J. Zakia (W&C) re: claims reserve issues (0.2); call with D. Ninivaggi (Lordstown) re: claims reserve issues (0.3); call with Silverman (S. Kohler and others), R. Szuba (W&C), A. Kroll (Lordstown), and M. Leonard (Baker) re: claims reserve issues (0.8); email to R. Winning (M3) re: claims reserve issues (0.1); emails to J. Zakia (W&C) re: reserve issues (0.1); further call with R. Kampfner (W&C) and R. Szuba (W&C) re: claims reserve issues (0.3); further analysis re: claims reserve issues (0.7).	D Turetsky	2.80	5,320.00
22 February 2024	Attend call with D. Turetsky, A. Kroll, M. Leonard, and Silverman re: claims reserve (0.8); call with A. Crnkovich re: claims detail (0.2); further call with D. Turetsky and R. Kampfner re: same (0.3); draft correspondence to S. Vasser re: claims reserve (0.4); additional call with D. Turetsky re: same (0.1); draft asserted claims detail Plan supplement (0.9); draft correspondence to R. Kampfner and D. Turetsky re:	R Szuba	4.20	5,418.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	same (0.3); draft correspondence to A. Kroll, A. Crnkovich, and Silverman team re: same (0.2); draft correspondence to M. Port re: tax claim issue (0.2); review correspondence re: same (0.1); review claims and supporting documents re: same (0.2); draft further correspondence to A. Kroll re: asserted claims detail and tax claims (0.3); draft correspondence to D. Kovsky and F. Lawall re: claims reserve language and confirmation order (0.2).			
23 February 2024	Review revised asserted claims detail documents in connection with claims reserve resolution.	D Kim	0.20	286.00
23 February 2024	Draft correspondence to A. Crnkovich re: claims schedule (0.2); draft correspondence to A. Kroll re: claims detail (0.2); revise claims detail for Plan supplement (0.5); draft correspondence to D. Turetsky and R. Kampfner re: same (0.2); draft correspondence to Equity Committee and Creditors' Committee re: same (0.4); draft correspondence to Ohio Plaintiffs re: settlement notices (0.1); revise settlement notices (0.3); draft correspondence to Company re: settlement notices (0.2).	R Szuba	2.10	2,709.00
24 February 2024	Call with J. Zakia (W&C) re: claims reserve issues (0.1); email to S. Vasser (Dechert) re: reserve issues (0.2); email to Brown Rudnick (B. Silverberg and others) re: revised SEC settlement (0.1); email to D. Kovsky (Troutman) and F. Lawall (Troutman) re: SEC settlement (0.1).	D Turetsky	0.50	950.00
24 February 2024	Draft correspondence to D. Turetsky and W&C team re: settlement notices.	R Szuba	0.10	129.00
25 February 2024	Revise Ohio Settlement notices (0.2); draft correspondence to plaintiffs re: same (0.2).	R Szuba	0.40	516.00
26 February 2024	Various calls with M. Etkin considering "short form" notice to Ohio Securities Claimants.	R Kampfner	0.30	570.00
26 February 2024	Emails to D. Tsitsis (Silverman) and others re: claim reserve issues (0.2); call with D. Tsitsis (Silverman) re: claim reserve issues (0.1).	D Turetsky	0.30	570.00
26 February 2024	Draft correspondence to A. Kroll (Company) and C. Tsitsis (Silverman) re: Plan supplement exhibit re: asserted claims (0.3); draft further correspondence to E. Hammes and Silverman team re: asserted claims detail (0.2); draft correspondence to Ohio Plaintiffs re: settlement notices (0.2).	R Szuba	0.70	903.00
27 February 2024	Email to F. Lawall (Troutman) and D. Kovsky (Troutman) re: director indemnification claim issues (0.1); call with D. Kovsky (Troutman) and F. Lawall (Troutman) re: Young Conaway director claims (0.3); emails to R. Winning (M3) re: claims reserve issues (0.2); call with M3 (M. Winning, W. Gallagher) and Brown Rudnick (B. Silverberg, S. Dwoskin) re: derivative claim issues (1.1).	D Turetsky	1.70	3,230.00

WHITE & CASE

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
27 February 2024	Draft correspondence to D. Turetsky re: claims ombudsman agreement (0.2); draft correspondence to Ohio Plaintiffs re: settlement notices (0.2); revise settlement notices (0.3); draft correspondence to company re: settlement notices for confirmation order insert (0.2); draft correspondence to Ohio Plaintiffs re: notice information (0.3); draft correspondence to Company re: same (0.1).	R Szuba	1.30	1,677.00
28 February 2024	Confer with R. Szuba re: claims ombudsman agreement (0.2); review Claims Ombudsman issues (0.5).	R Kampfner	0.70	1,330.00
28 February 2024	Further analysis re: claims ombudsman issues (0.2); call with A. Halperin (Halperin Battaglia) re: claims ombudsman issues (0.2).	D Turetsky	0.40	760.00
28 February 2024	Further revise claims ombudsman agreement (0.3); correspond with B. Silverberg re: same (0.3); correspond with D. Kovsky re: same (0.2); confer with R. Kampfner re: same (0.2).	R Szuba	1.00	1,290.00
29 February 2024	Review and comment re: SEC notice of Offer/OIP (0.2); calls with J. Croke (S&C) re: SEC settlement issues (0.2); calls with B. Silverberg (Brown Rudnick) re: OIP issues (0.2); review OIP issued by SEC (0.2); emails to D. Ninivaggi (Lordstown) and others re: OIP (0.2); emails to B. Silverberg (Brown Rudnick) re: claims ombudsman agreement (0.1); emails to F. Lawall (Troutman) and D. Kovsky (Troutman) re: claims ombudsman issues (0.1).	D Turetsky	1.20	2,280.00
29 February 2024	Correspond with M. Patterson (WBD) re: notice of SEC offer and OIP (0.1); review SEC press release re: same (0.1); review and revise draft notice of SEC Offer and OIP (0.1); correspond with D. Turetsky re: same (0.1).	D Kim	0.40	572.00
29 February 2024	Draft correspondence to D. Turetsky re: claims ombudsman agreement (0.2); review correspondence from Creditors' Committee re: same (0.1); draft correspondence to Creditors' Committee re: confirmation order language re: claims Ombudsman (0.2); draft correspondence to Equity Committee re: same (0.1); review confirmation order re: same (0.1); draft correspondence to counsel to Ohio Plaintiffs re: settlement notices (0.2); draft correspondence to counsel to Creditors' Committee and Equity Committee re: same (0.2).	R Szuba	1.10	1,419.00
SUBTOTAL: Claims Administration & Objections			92.60	158,223.00

Corporate Advice & Board Meetings

19 February 2024	Email to R. Szuba (W&C) re: board meeting issues.	D Turetsky	0.10	190.00
20 February 2024	Email to R. Szuba (W&C) re: board meeting issues.	D Turetsky	0.10	190.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
20 February 2024	Review prior board resolutions re: Plan and Plan supplement approvals.	R Szuba	0.20	258.00
21 February 2024	Call with R. Szuba (W&C) re: board meeting issues.	D Turetsky	0.10	190.00
22 February 2024	Call with D. Ninivaggi (Lordstown) re: board meeting issues (0.1); prepare for board meeting (0.2); email to R. Szuba (W&C) re: talking points for board meeting (0.1).	D Turetsky	0.40	760.00
23 February 2024	Prepare for Lordstown board meeting (0.2); attend and advise at Lordstown board meeting with Lordstown board (K. Feldman, D. Hamamoto, D. Ninivaggi, E. Hightower, A. Strand, D. Spencer, J. Reiss, and others), A. Kroll (Lordstown), M. Leonard (Baker), M. Schiernholdt (KPMG), S. Stelk (KPMG), J. Spreen (Baker) (0.5).	D Turetsky	0.70	1,330.00
SUBTOTAL: Corporate Advice & Board Meetings			1.60	2,918.00

Exclusivity, Plan & Disclosure Statement

1 February 2024	Continue to work on Plan issues, including resolving issues with Ohio Securities claimants, Equity Committee and Creditors' Committee (1.3); calls with D. Turetsky (W&C) re: Creditors' Committee Plan issues (0.3) and Ohio litigant Plan issues (0.4); call with D. Kim, F. He, R. Szuba re: Plan strategy and confirmation issues (0.4).	R Kampfner	2.40	4,560.00
1 February 2024	Call with D. Ninivaggi (Lordstown) re: Plan issues (0.1); emails to M. Patterson (Womble) re: Plan issues (0.1); calls with R. Kampfner (W&C) re: Creditors' Committee Plan issues (0.3) and Ohio litigant Plan issues (0.4); further analysis re: Foxconn Plan issues (0.2); call with D. Guyder (Allen Overy) re: Foxconn Plan issues (0.2); email to J. Herz (Allen & Overy) re: Foxconn Plan issues (0.1); review DiamondPeak director Plan issues (0.2); further analysis re: additional Plan issues (0.5); further review and comment re: Plan (0.3); review and comment re: proposed Ohio litigant Plan language (0.2).	D Turetsky	2.60	4,940.00
1 February 2024	Research re: confirmation issues concerning former D&O issues (0.9) and revise confirmation brief (1.7); call with R. Szuba and D. Kim re: Plan/confirmation issues (0.7); confer with A. Crnkovich (Silverman) re: material for effective date of Plan (0.4); confer with C. Tsitsis (Silverman) re: same (0.4).	F He	4.10	6,027.00
1 February 2024	Call with F. He, R. Szuba re: Plan-related pending case matters (0.8); review and revise draft Ninivaggi confirmation declaration (0.7); analyze proposed changes to Plan and confirmation to resolve certain informal objections (0.4); review draft litigation trust agreement (0.2); further revise reply in support of confirmation (1.4); call with R. Kampfner, F. He, R. Szuba re: Plan strategy and confirmation issues (0.4).	D Kim	3.90	5,577.00

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LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
1 February 2024	Draft correspondence to counsel to former D&O re: Plan filing (0.1); draft correspondence to Womble team re: Plan service (0.1); call with D. Turetsky re: same (0.1); call with F. He and D. Kim re: confirmation brief, Plan supplement, and other open Plan/confirmation issues (0.8); draft correspondence to M. Etkins re: Plan (0.1); review Plan comments from Ohio Plaintiffs and Equity Committee (0.3); review correspondence from counsel to Creditors' Committee re: Plan (0.3); draft correspondence to J. Spreen re: new organizational documents (0.1); review same (0.1); attend Plan strategy call with F. He, R. Kampfner, and D. Kim (0.5).	R Szuba	2.50	3,225.00
2 February 2024	Continued work on resolving Ohio litigation Plan issues (1.9); further revise Plan (0.9); calls with D. Turetsky (W&C) re: Plan issues (0.6).	R Kampfner	3.40	6,460.00
2 February 2024	Calls with R. Kampfner (W&C) re: Plan issues (0.6); call with M. Patterson (Womble) re: confirmation issues (0.2); call with R. Szuba (W&C) re: Plan issues (0.2); further review/comment Plan ahead of filing (0.8); further analysis re: Plan issues (0.6).	D Turetsky	2.40	4,560.00
2 February 2024	Review and revise confirmation brief (1.4); confer with M. Leonard re: Plan issues (0.3).	F He	1.70	2,499.00
2 February 2024	Further review and revise draft confirmation brief (2.1); correspond with M. Patterson (WBD) re: same (0.1); correspond with F. He, R. Szuba re: updates to brief (0.3); review and revise draft Kroll declaration in support of confirmation (0.5).	D Kim	3.00	4,290.00
2 February 2024	Revise Plan re: adequate protection language (0.7); draft correspondence to R. Kampfner re: same (0.3); draft correspondence to Equity Committee re: same (0.1); draft correspondence to Ohio Plaintiffs re: same (0.1); draft correspondence to D. Turetsky, KCC, and Womble teams re: service of modified Plan (0.2); draft correspondence to Silverman re: flow of funds memo and modified Plan (0.2); confer with F. He re: same (0.2).	R Szuba	1.80	2,322.00
3 February 2024	Calls with R. Kampfner (W&C) re: DiamondPeak director Plan issues (0.2) and further Plan issues (0.3); further research/analysis re: confirmation issues/strategy (0.7).	D Turetsky	1.20	2,280.00
4 February 2024	Analysis re: Foxconn preferred Plan treatment issues.	D Turetsky	0.20	380.00
5 February 2024	Calls with D. Turetsky re: director Plan matters.	J Zakia	0.60	1,200.00
5 February 2024	Attend call with Foxconn re: preferred certificate and other Plan issues (0.6); review Jefferies Declaration (0.5); call with Mr. Winning re: 510(b) treatment issues (0.5); review Plan comments from Creditors' Committee and Equity Committee (0.5); calls with D. Turetsky (W&C) re: Plan issues (0.6); further call with W&C team (F. He, D. Kim, D. Turetsky) re: Plan issues	R Kampfner	2.90	5,510.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	and strategy (0.2).			
5 February 2024	Call with D. Ninivaggi (Lordstown) re: Plan issues (0.1); calls with R. Kampfner (W&C) re: Plan issues (0.6); email to J. Herz (Allen Overy) and D. Guyder (Allen Overy) re: Foxconn Plan issues (0.1); calls with M. Leonard (Baker) re: Foxconn preferred equity issues (0.1); emails to S. Vasser (Dechert) re: director Plan issues (0.1); call with S. Vasser (Dechert) re: director Plan issues (0.5); calls with J. Zakia (W&C) re: director Plan issues (0.6); email to D. Ninivaggi (Lordstown) re: director Plan issues (0.1); further call with W&C team (F. He, D. Kim, R. Kampfner) re: Plan issues and strategy (0.2); review potential draft director Plan objection issues (0.2); further analysis re: Foxconn Plan issues (0.3).	D Turetsky	2.90	5,510.00
5 February 2024	Call with D. Turetsky, R. Kampfner, D. Kim re: various Plan developments and strategy.	F He	0.20	294.00
5 February 2024	Review and revise draft Kroll declaration in support of Plan confirmation (0.7); review and revise draft Finger declaration in support of Plan confirmation (0.4); correspond with R. Szuba, F. He re: confirmation declarations (0.2); further review and revise confirmation brief (0.5); call with D. Turetsky, R. Kampfner, F. He, R. Szuba re: confirmation issues and strategy (0.2).	D Kim	2.00	2,860.00
5 February 2024	Draft correspondence to M. Leonard re: 7023 Stipulation (0.1); revise voting declaration of A. Estrada (0.2); draft correspondence with A. Estrada re: same (0.1); draft correspondence with D. Turetsky and R. Kampfner re: same (0.1).	R Szuba	0.50	645.00
6 February 2024	Further review Plan confirmation documents/issues.	J Zakia	0.40	800.00
6 February 2024	Review Plan comments sent by Creditors' Committee (0.5); review comments from Equity Committee re: open Plan issues (0.7); attend various calls with Equity Committee re: Plan (1.1); call with Allen Overy (D. Guyder, J. Herz) and W&C (D. Turetsky, R. Szuba) re: Foxconn Plan matters (0.3); calls with D. Turetsky (W&C) re: Plan issues (0.6).	R Kampfner	3.20	6,080.00
6 February 2024	Emails to R. Kampfner (W&C) re: Plan issues (0.2); review and comment re: Jefferies declaration in support of confirmation (0.4); calls with R. Szuba (W&C) re: confirmation brief issues (0.3); further research/analysis re: section 510(b) confirmation issues (0.5); emails to R. Szuba (W&C) re: confirmation brief issues (0.1); call with B. Silverberg (Brown Rudnick) re: Plan issues (0.6); calls with R. Kampfner (W&C) re: Plan issues (0.6); call with M. Leonard (Baker Hostetler) re: Plan issues (0.1); further research/analysis re: Plan discharge issues re: US Trustee objection (0.4); email to B. Silverberg (Brown Rudnick) re: US Trustee discharge issues (0.2); call with Allen Overy (D. Guyder, J. Herz) and W&C (R. Kampfner, R. Szuba) re: Foxconn Plan matters (0.3);	D Turetsky	4.00	7,600.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	further analysis re: additional Plan issues (0.3).			
6 February 2024	Further revise declaration of A. Kroll in support of confirmation (0.9); review and analyze revised confirmation declaration (0.8); correspond with R. Szuba, F. He re: same (0.1); revise Plan supplement filing list (0.2); draft response to R. Singh re: exclusivity motion (0.2); correspond with F. He, R. Szuba re: same (0.1).	D Kim	2.30	3,289.00
6 February 2024	Call with D. Turetsky re: law and argument re: treatment of 510(b) claims (0.1); review confirmation brief re: same (0.2); review documents re: same (0.2); draft declaration in support of confirmation of Jefferies re: 510(b) formula (0.1); review correspondence from D. Turetsky re: same (0.1); draft correspondence to Jefferies re: same (0.1); revise D. Ninivaggi confirmation declaration (1.1); revise A. Kroll confirmation declaration (0.9); compile Plan supplement documents (0.5); draft Plan supplement notice (0.4); draft correspondence to counsel to Creditors' Committee re: same (0.2); draft correspondence to counsel to Equity Committee re: same (0.1); draft correspondence to Company re: same (0.2).	R Szuba	4.20	5,418.00
7 February 2024	Calls with M. Patterson (Womble) re: Plan confirmation issues (0.5); further analysis re: Plan/confirmation strategy issues (0.6); email to D. Ninivaggi (Lordstown) re: Plan supplement issues (0.1); call with D. Ninivaggi (W&C) re: Plan supplement issues (0.1); further analysis/resolve Plan supplement issues (0.3); review and comment re: response to shareholder Plan inquiry (0.2); review and comment re: post-effective date bylaws/certificate (0.1); emails to R. Szuba (W&C) re: Plan supplement issues (0.1); call with D. Kovsky (Troutman) re: Plan issues (0.2).	D Turetsky	2.20	4,180.00
7 February 2024	Call with C. Tsitsis and A. Crnkovich (Silverman) and R. Szuba re: effective date issues (1.1); confer with D. Turetsky re: waterfall issues for Plan (0.2).	F He	1.30	1,911.00
7 February 2024	Further revise 1129 section of confirmation brief (0.5); review revised first supplemental Plan supplement (0.3).	D Kim	0.80	1,144.00
7 February 2024	Attend call with R. Kampfner and Counsel to Equity Committee (0.5); review Creditors' Committee Plan comments (0.2); revise Plan with respect to same (0.3); call with C. Tsitsis and A. Crnkovich re: Plan, flow of funds with respect to Plan, and effective date issues (1.1); review correspondence from D. Ninivaggi and D. Turetsky re: Plan supplement documents (0.2); revise new organizational documents (0.1); draft correspondence to D. Turetsky re: same (0.1); draft correspondence to D. Ninivaggi re: same (0.1); draft correspondence to counsel to Creditors' Committee and Equity Committee re: Plan supplement documents (0.1); review correspondence from Foxconn re: Plan (0.1); revise Plan (0.2).	R Szuba	3.00	3,870.00

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LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
8 February 2024	Confer with D. Turetsky re: DiamondPeak director Plan issues (0.5); confer with client re: Plan strategy issues (0.6), confer with SEC counsel re: confirmation timing (0.4).	J Zakia	1.50	3,000.00
8 February 2024	Team Plan call with D. Kim R. Szuba F. He re: pending case issues and strategy.	R Kampfner	0.20	380.00
8 February 2024	Emails to R. Szuba (W&C) re: Plan supplement issues (0.1); review and comment re: Equity Committee revisions to bylaws and company certificate (0.1); calls with J. Zakia (W&C) re: DiamondPeak director Plan issues (0.5); further analysis re: additional Plan issues (0.3).	D Turetsky	1.00	1,900.00
8 February 2024	Call with R. Szuba, D. Kim re: Plan matters and strategy (0.2); confer with D. Turetsky re: Plan issues (0.2); research re: same (0.1); confer with D. Turetsky re: same (0.1).	F He	0.60	882.00
8 February 2024	Team call with R. Kampfner, R. Szuba, F. He re: pending Plan issues and strategies.	D Kim	0.20	286.00
8 February 2024	Attend Plan strategy call with D. Turetsky, R. Kampfner, and D. Kim (0.3); draft correspondence with J. Cushing re: new organizational documents (0.1); revise same (0.2).	R Szuba	0.60	774.00
9 February 2024	Confer with D. Turetsky re: DiamondPeak director (0.1) and Young Conaway director (0.1) Plan issues; further analysis re: strategy in connection with potential confirmation objections (0.4); review email response to US Trustee Plan release inquiry (0.2).	J Zakia	0.80	1,600.00
9 February 2024	Calls with D. Turetsky (W&C) re: Young Conaway Plan issues (0.3) and additional Plan issues (0.2); call with W&C team (R. Szuba, F. He, D. Kim, D. Turetsky) re: Plan strategy issues (1.0).	R Kampfner	1.50	2,850.00
9 February 2024	Calls with J. Zakia (W&C) re: DiamondPeak director issues (0.1) and Young Conaway director Plan issues (0.1); further analysis re: DiamondPeak director Plan objection issues (0.3); analysis re: Plan issues raised by Young Conaway directors (0.4); analysis re: Plan release inquiry raised by US Trustee (0.7); email to B. Hackman (US Trustee) re: response to US Trustee Plan release inquiry (0.4); calls with R. Kampfner (W&C) re: Young Conaway Plan issues (0.3) and additional Plan issues (0.2); call with W&C team (R. Szuba, F. He, D. Kim, R. Kampfner) re: Plan strategy issues (1.0); call with M. Patterson (Womble) re: Plan issues (0.2); review Singh exclusivity objection (0.1); call with B. Hackman (US Trustee) re: Plan issues (0.3); emails to R. Szuba (W&C) and F. He (W&C) re: exclusivity issues (0.1); further analysis re: discharge issues (0.2); call with D. Guyder (Allen Overy) re: Foxconn Plan issues (0.1); call with B. Silverberg (Brown Rudnick) re: Plan issues (0.4); call with D. Kovsky (Troutman) re: Plan issues (0.2); email to R. Szuba (W&C) re: Plan supplement issues (0.1); email	D Turetsky	6.00	11,400.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	to F. He (W&C) re: Singh exclusivity objection (0.1); further analysis re: additional Plan confirmation issues (0.6); review confirmation hearing notice and emails to D. Kim (W&C) re: same (0.1).			
9 February 2024	Call with D. Turetsky, R. Kampfner, D. Kim, and R. Szuba re: various Plan confirmation strategies and issues (1.0); confer with R. Szuba re: confirmation issues (0.2); review potential objections to Plan (0.4) and revise brief (0.8).	F He	2.40	3,528.00
9 February 2024	Call with D. Turetsky, R. Kampfner, R. Szuba, F. He re: Plan confirmation issues and related strategies (1.0); review objection to Debtors' exclusivity motion filed by R. Singh (0.2); review and analyze issues re: same (0.5); correspond with D. Turetsky re: same (0.1); review proposed modifications to form of confirmation order (0.3).	D Kim	2.10	3,003.00
9 February 2024	Review correspondence from counsel to former Directors and Officers (0.2); draft correspondence to J. Cushing re: new organizational documents (0.1); call with J. Cushing re: same (0.1); revise same (0.1); draft correspondence to D. Ninivaggi and company re: Plan supplement (0.1); draft correspondence to Equity Committee re: requests from former Directors and Officers (0.2); draft correspondence to D. Turetsky and R. Kampfner re: voting report and voting declaration (0.2); draft voting declaration (0.2); correspond with R. Kampfner and F. He re: same (0.2); draft correspondence to A. Kroll re: same (0.1); draft correspondence to counsel to former directors and officers responding to Plan issues raised (1.6); research/review of documents re: issues concerning same (0.8).	R Szuba	3.90	5,031.00
10 February 2024	Confer with D. Turetsky re: DiamonPeak director Plan issues.	J Zakia	0.40	800.00
10 February 2024	Review Plan of reorganization (0.2); confer with D. Turetsky re: YCST director Plan issues (0.2).	R Kampfner	0.40	760.00
10 February 2024	Call with J. Zakia (W&C) re: DiamondPeak director Plan issues (0.4); call with R. Kampfner (W&C) re: Young Conaway director Plan issues (0.2); email and call with R. Szuba (W&C) re: Plan/insurance issue (0.1).	D Turetsky	0.70	1,330.00
11 February 2024	Research re: Plan requirement requiring claimants to pursue insurance prior to recovery from Debtors (1.7); draft email analysis to D. Turetsky re: same (0.6).	R Szuba	2.30	2,967.00
12 February 2024	Review revised Plan documents (1.3); confer with directors' counsel re: potential Plan objection (0.8); confer with D. Turetsky re: DiamondPeak director Plan issues (0.7).	J Zakia	2.80	5,600.00
12 February 2024	Review confirmation order edits from Ohio Securities Claimants (0.7); calls with D. Turetsky (W&C) re:	R Kampfner	1.00	1,900.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	former director Plan issues (0.2) and additional Plan issues (0.1).			
12 February 2024	Calls with J. Zakia (W&C) re: DiamondPeak director Plan issues (0.7); call with M. Patterson (Womble) re: exclusivity objection issues (0.2); review and analysis re: Ohio litigant confirmation order issues (0.3); email to R. Kampfner (W&C) and R. Szuba (W&C) re: Ohio litigant confirmation order issues (0.2); further research/analysis re: voting/potential Plan objection issues (1.4); email to J. Zakia (W&C) re: same (0.3); calls with R. Kampfner (W&C) re: former director Plan issues (0.2) and additional Plan issues (0.1); review and comment re: response to Young Conaway director Plan email (0.3); review and comment re: Plan reserve ratcheting mechanism (0.1); further analysis re: Plan insurance requirement issues (0.3); further analysis re: Plan discharge/release issues (0.3); (partial) call with W&C team (R. Szuba, F. He, D. Kim) re: Plan issues (0.1); email to D. Ninivaggi (Lordstown) re: exclusivity objection issues (0.1); further analysis re: additional Plan issues (0.5).	D Turetsky	5.10	9,690.00
12 February 2024	Review draft objection to Plan from D&O (0.4) and draft response for confirmation brief (2.4); confer with R. Szuba re: same (0.5); confer with D. Turetsky re: issues re: potential Plan objection by D&O (0.3); call with D. Turetsky, D. Kim and R. Szuba re: Plan developments and strategy (0.3).	F He	3.90	5,733.00
12 February 2024	Draft Debtors' reply to Singh exclusivity objection (0.8); correspond with R. Szuba, F. He re: same (0.1); review draft response re: Plan comments from former D&Os (0.2); review and analyze further modified form of confirmation order (0.6); review and revise Plan closing list (0.5); team Plan call with D. Turetsky, F. He, R. Szuba re: Feb. 22 hearing and related confirmation strategy issues (0.4).	D Kim	2.60	3,718.00
12 February 2024	Attend Plan strategy call with D. Turetsky, R. Kampfner, and D. Kim (0.2); revise response to counsel to former directors and officers based on comments received re: Plan (0.9); draft correspondence to J. Zakia re: confirmation order language re: settlement notices (0.1); draft correspondence to Equity Committee re: confirmation order and Plan (0.2).	R Szuba	1.40	1,806.00
12 February 2024	Research re: accepting creditor standing to object to Plan (3.5); summarize rules and case law for J. Zakia (1.2).	S Kagay	4.70	5,217.00
13 February 2024	Review draft DiamondPeak D&O objection to confirmation.	J Zakia	0.40	800.00
13 February 2024	Review confirmation order comments from M. Etkin (0.5); review/comment on confirmation brief (1.6); calls with D. Turetsky (W&C) re: Plan issues (0.7); call with S. Dwoskin (Brown Rudnick), D. Turetsky (W&C) and R. Szuba (W&C) re: Plan issues (0.6).	R Kampfner	3.40	6,460.00

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RE: Project Pickup

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
13 February 2024	Email to R. Stark (Brown Rudnick) re: Plan issues (0.1); confer with B. Silverberg (Brown Rudnick) re: exclusivity matters (0.1); calls with R. Kampfner (W&C) re: Plan issues (0.7); calls with M. Patterson (Womble) re: exclusivity issues (0.3); call with R. Szuba (W&C) re: Young Conaway director Plan issues (0.1); review and comment re: KCC voting declaration/exhibits (0.4); email to R. Szuba (W&C) re: KCC declaration (0.1); further research/analysis re: Plan discharge issues (0.3); further review/analysis re: confirmation order issues (0.3); further analysis re: Plan/insurance issues (0.3); further analysis re: additional Plan issues (0.2); review and comment re: confirmation order (0.1); call with D. Ninivaggi (Lordstown) re: Plan issues (0.4); email S. Vasser (Dechert) re: DiamondPeak settlement/Plan issues (0.1); review potential DiamondPeak director Plan objection issues (0.2); call with S. Dwoskin (Brown Rudnick), R. Kampfner (W&C) and R. Szuba (W&C) re: Plan issues (0.6); review and comment re: certificate of counsel re: exclusivity motion (0.1); email to M. Patterson (Womble) re: exclusivity motion issues (0.1); call and emails to S. Vasser (Dechert) re: Plan issues (0.1); further email to Brown Rudnick (S. Dwoskin, B. Silverberg, and R. Stark) re: DiamondPeak settlement/Plan issues (0.1).	D Turetsky	4.70	8,930.00
13 February 2024	Further revise draft response to objections for confirmation brief (1.6); confer with R. Szuba and D. Kim re: Plan/confirmation issues (0.5).	F He	2.10	3,087.00
13 February 2024	Finalize draft reply in support of Debtors' second exclusivity motion (0.6); further revise Plan checklist (0.4); (partial) call with F. He, R. Szuba re: pending case Plan/confirmation issues (0.2).	D Kim	1.20	1,716.00
13 February 2024	Call with F. He and D. Kim re: open Plan/confirmation issues (0.5); attend call with S. Dwoskin, R. Kampfner, and D. Turetsky re: Plan and confirmation issues (0.6); revise voting declaration (0.3) and exhibits to same (0.3); draft correspondence to D. Turetsky re: same (0.2).	R Szuba	1.90	2,451.00
14 February 2024	Confer with D. Turetsky re: DiamondPeak director plan issues (0.2); review/analysis re: issues in connection with potential confirmation objections (2.2).	J Zakia	2.40	4,800.00
14 February 2024	Attend call with Jefferies re: confirmation declaration (0.8); further review confirmation order comments by Mr. Etkin (0.8); review issues re: potential director objections (1.7); calls with D. Turetsky (W&C) re: Plan issues (0.8).	R Kampfner	4.10	7,790.00
14 February 2024	Calls with J. Zakia (W&C) re: DiamondPeak director Plan issues (0.2); email to R. Szuba (W&C) re: confirmation order issues (0.1); email to L. Hultgren (Jefferies) re: Plan issues (0.1); call with R. Hamilton (Jefferies) re: Jefferies declaration in support of Plan (0.2); calls with R. Kampfner (W&C) re: Plan issues (0.8); further analysis re: DiamondPeak director Plan issues (0.2); further analysis re: 510(b) treatment issues (0.3); (partial) call with Jefferies (J. Finger, R.	D Turetsky	2.50	4,750.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Hamilton, L. Hultgren) re: Jefferies declaration (0.3); further analysis re: additional Plan issues (0.3).			
14 February 2024	Further draft/revise confirmation brief (0.8); further review/revise Kroll declaration in support of Plan confirmation (0.3); revise Plan confirmation closing checklist (0.2); correspond with R. Szuba re: same (0.1).	D Kim	1.40	2,002.00
14 February 2024	Revise Plan with respect to comments from Foxconn (0.1); draft correspondence to counsel to J. Herz (Foxconn) (0.1); revise Plan supplement (0.4); draft correspondence to R. Kampfner and D. Turetsky re: open issues related to same (0.3); research re: subordination issues in connection with Plan (0.4); draft correspondence to D. Turetsky and R. Kampfner re: same (0.2).	R Szuba	1.50	1,935.00
15 February 2024	Confer with D. Turetsky re: DiamondPeak director/Plan issues (0.8), review revised Plan documents (0.7).	J Zakia	1.50	3,000.00
15 February 2024	Team call (partial) with D. Kim, R. Szuba re: confirmation order and Plan issues.	R Kampfner	0.40	760.00
15 February 2024	Calls with J. Zakia (W&C) re: DiamondPeak director/Plan issues (0.8); email to J. Herz (Allen & Overy) re: Foxconn Plan issues (0.1); calls with S. Vasser (Dechert) re: DiamondPeak settlement/Plan issues (0.2); emails to J. Zakia (W&C) re: DiamondPeak settlement/Plan issues (0.1); calls with B. Silverberg (Brown Rudnick) re: DiamondPeak settlement/Plan issues (0.4); emails to R. Szuba (W&C) re: Plan/confirmation order issues (0.1); further analysis re: 510(b) Plan treatment issues (0.7); further analysis re: confirmation order issues (0.2); review revisions to confirmation order (0.2); further analysis re: director Plan issues (0.4); further analysis re: DiamondPeak settlement/Plan issues (0.4).	D Turetsky	3.60	6,840.00
15 February 2024	Team call with R. Kampfner, R. Szuba re: confirmation order and Plan issues (0.6); review revised voting declaration (0.4); review and analyze revised voting exhibits (0.2); correspond with A. Estrada re: voting declaration/exhibits (0.1).	D Kim	1.30	1,859.00
15 February 2024	Attend Plan strategy call with R. Kampfner and D. Kim (0.7); review Plan supplement documents from Equity Committee (0.2); draft correspondence to R. Kampfner and D. Turetsky re: Plan Supplement (0.3); review correspondence from J. Zakia and D. Turetsky re: subordination issue (0.3); draft correspondence to J. Herz (A&O counsel to Foxconn) re: Foxconn voting status (0.1); draft correspondence to A. Crnkovich re: cash flow analysis (0.1); revise confirmation order with respect to comments from Creditors' Committee and other parties in interest (1.9); draft correspondence to R. Kampfner and D. Turetsky re: confirmation order (0.3); draft correspondence to counsel to Ohio Plaintiffs re: confirmation order (0.3); draft correspondence to counsel to Foxconn re: same (0.1);	R Szuba	4.60	5,934.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	draft correspondence to counsel to SEC re: same (0.1); draft correspondence to counsel to Company re: same (0.2).			
16 February 2024	Confer with D. Turetsky re: DiamondPeak settlement/Plan issues (0.8), confer with directors' counsel re: potential Plan objection (0.6), confer with Equity Committee counsel re: potential Plan objection (0.2).	J Zakia	1.60	3,200.00
16 February 2024	Review and revise confirmation order (0.8); review D&O release issues (2.3); calls with D. Turetsky (W&C) re: Plan issues (0.5).	R Kampfner	3.60	6,840.00
16 February 2024	Emails to J. Zakia (W&C) re: DiamondPeak settlement/Plan issues (0.1); calls with J. Zakia (W&C) re: DiamondPeak settlement/Plan issues (0.8); call with S. Vasser (Dechert) re: DiamondPeak settlement/Plan issues (0.2); calls with R. Kampfner (W&C) re: Plan issues (0.5); further analysis re: DiamondPeak settlement/Plan issues (0.3); further research/analysis re: Plan discharge issues (1.3); further research/analysis re: class 8 treatment issues (1.4); further analysis re: additional Plan issues (0.4); call with B. Silverberg (Brown Rudnick) re: Plan issues (0.2); further review and comment re: confirmation order language (0.3).	D Turetsky	5.50	10,450.00
16 February 2024	Further revise confirmation brief (0.4); review and analyze potential objection to same (0.5).	D Kim	0.90	1,287.00
16 February 2024	Review correspondence from J. Herz (A&O counsel to Foxconn) re: confirmation order (0.1); revise confirmation order re: same (0.1).	R Szuba	0.20	258.00
17 February 2024	Further analysis re: Plan discharge issues (0.4) and Plan cramdown issues (0.4).	D Turetsky	0.80	1,520.00
18 February 2024	Review and revise confirmation order per comments from Creditors' Committee (0.7); calls with D. Turetsky re: Plan issues (0.2).	R Kampfner	0.90	1,710.00
18 February 2024	Emails to R. Szuba (W&C) re: Young & Conaway director issues (0.1); calls with R. Kampfner (W&C) re: Plan issues (0.2).	D Turetsky	0.30	570.00
19 February 2024	Confer with D. Turetsky re: DiamondPeak director Plan issues (0.5); confer with Equity Committee counsel re: Diamond Peak resolution (0.5).	J Zakia	1.00	2,000.00
19 February 2024	Review/analysis issues re: confirmation order and related matters (0.5); review voting issues re: D&Os (0.7); review Jeffries declaration (0.7); review D&O potential objections (0.3); calls with D. Turetsky re: Plan issues (0.4).	R Kampfner	2.60	4,940.00
19 February 2024	Emails to J. Zakia (W&C) re: DiamondPeak director Plan issues (0.2); calls with J. Zakia (W&C)	D Turetsky	2.00	3,800.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	DiamondPeak director Plan issues (0.5); calls with R. Kampfner (W&C) re: Plan issues (0.4); call with S. Vasser (Dechert) re: DiamondPeak director Plan issues (0.3); analysis re: voting issues (0.2); further analysis re: DiamondPeak director Plan issues (0.4).			
19 February 2024	Attend Plan strategy call with R. Kampfner, D. Turetsky, and D. Kim.	R Szuba	0.80	1,032.00
20 February 2024	Confer with D. Turetsky re: DiamondPeak director Plan issues (0.4); confer with directors' counsel re: resolution of potential Plan objections (0.8), confer with Equity Committee counsel re: directors' potential Plan objection (0.3).	J Zakia	1.50	3,000.00
20 February 2024	Calls with D. Turetsky (W&C) re: Plan issues (0.6); call with R. Szuba re: Plan (0.3).	R Kampfner	0.90	1,710.00
20 February 2024	Email to D. Ninivaggi (Lordstown) and M. Leonard (Baker) re: Plan issues (0.1); call with J. Zakia (W&C) re: DiamondPeak director Plan issues (0.4); calls with R. Kampfner (W&C) re: Plan issues (0.6); calls with R. Szuba (W&C) re: Plan issues (0.2); emails to J. Zakia (W&C) and R. Kampfner (W&C) re: Plan issues (0.2); further analysis re: Young Conaway director Plan issues (0.1).	D Turetsky	1.60	3,040.00
20 February 2024	Further revise reply and confirmation brief based on revisions to modified Plan (0.8); correspond with R. Szuba re: same (0.1).	D Kim	0.90	1,287.00
20 February 2024	Call with R. Kampfner re: Plan issues (0.3); draft correspondence to A. Estrada (KCC) re: voting issues (0.1); calls with D. Turetsky re: Plan issues (0.1); draft correspondence to D. Turetsky re: voting issues (0.2); draft correspondence to M. Leonard re: balloting (0.1); draft correspondence to J. Spreen, J. Rodriguez, and M. Leonard re: datasite (0.1); review issues re: same (0.2); draft correspondence to R. Kampfner re: confirmation declarations (0.1); draft correspondence to R. Kampfner re: third amended Plan (0.1); draft correspondence to D. Turetsky and R. Kampfner re: requests from former directors and officers (0.2); draft correspondence to D. Turetsky re: same (0.1); draft correspondence to SEC re: Plan and confirmation order (0.2); draft correspondence to Ohio Plaintiffs re: Plan and confirmation order (0.2); draft correspondence to counsel to Foxconn re: same (0.1); review correspondence from counsel to Ohio Plaintiffs re: confirmation order (0.1); draft responses to same (0.2); draft correspondence to Company re: Plan and confirmation order (0.2).	R Szuba	2.60	3,354.00
21 February 2024	Further analysis re: resolving Youn Conaway director Plan issues (0.6) and other Plan issues re: D&Os (0.3); review/comment re: confirmation declarations (0.5); calls with D. Turetsky (W&C) re: Plan issues (0.8) and confirmation order issues (0.1); call with Jefferies (R. Hamilton, L. Hultgren, K. Lisanti, J. Finger, and L. Hultgren) and W&C (D. Turetsky and J. Zakia) re:	R Kampfner	2.50	4,750.00

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	Jefferies declaration (0.2).			
21 February 2024	Email to J. Zakia (W&C) and R. Kampfner (W&C) re: DiamondPeak director Plan issues (0.1); email to B. Silverberg (Brown Rudnick) re: Young Conaway director Plan issues (0.1); call with R. Szuba (W&C) re: confirmation order issues (0.1); calls with R. Kampfner (W&C) re: Plan issues (0.8) and confirmation order issues (0.1); call with Jefferies (R. Hamilton, L. Hultgren, K. Lisanti, J. Finger, and L. Hultgren) and W&C (R. Kampfner and J. Zakia) re: Jefferies declaration (0.2); calls with B. Silverberg (Brown Rudnick) re: Plan issues (0.2); further review and comment re: confirmation order (0.6); further research/analysis re: discharge issues (0.3); further analysis re: additional Plan issues (0.6).	D Turetsky	3.10	5,890.00
21 February 2024	Further revise reply section of confirmation brief (1.6); review revised voting report (0.3); correspond with A. Estrada re: revisions to exhibits to same (0.1); further review revised voting exhibits (0.3); review and analyze Plan revisions (0.3).	D Kim	2.60	3,718.00
21 February 2024	Review correspondence from D. Ninivaggi re: confirmation order (0.1); draft Plan supplement notice and exhibits thereto (0.4); draft correspondence to R. Kampfner and D. Turetsky re: same (0.2); draft correspondence to counsel to former directors and officers re: requested confirmation order language (0.1); call with D. Turetsky re: Plan and confirmation issues (0.1); further research re: discharge issues in connection with UST Plan objection (0.3).	R Szuba	1.20	1,548.00
22 February 2024	Confer with D. Turetsky re: Plan release issues (0.1); review revised Plan documents (0.5).	J Zakia	0.60	1,200.00
22 February 2024	Review SEC issue re: Foxconn distributions (0.8); review and revise Plan wording re: Foxconn distributions (0.7); calls with D. Turetsky re: Plan issues (0.7); call with D. Baddley re: SEC Plan issues (0.3); review confirmation declarations (0.6); call with D. Kim, R. Szuba re: case administration (0.4); call with Allen Overy (J. Herz and others), D. Turetsky (W&C) and R. Szuba (W&C) re: Foxconn Plan issues (0.3).	R Kampfner	3.80	7,220.00
22 February 2024	Calls with R. Kampfner (W&C) re: Plan issues (0.7); call with D. Baddley (SEC) and R. Kampfner (W&C) re: SEC Plan issues (0.2); call with D. Ninivaggi (Lordstown) re: Plan issues (0.1); call with S. Vasser (Dechert) re: Plan issues (0.1); call with R. Stark (Brown Rudnick) and B. Silverberg (Brown Rudnick) re: Plan issues (0.4); further calls with D. Baddley (SEC) re: SEC Plan issues (0.3); call with S. Riel (Young Conaway) re: Plan issues (0.6); emails to R. Szuba (W&C) re: confirmation order issues (0.2); email to D. Kim (W&C) re: Plan voting issues (0.1); email to Brown Rudnick (B. Silverberg, R. Stark, S. Dwoskin and others) re: Young Conaway director Plan issues (0.3); call with Allen Overy (J. Herz and others), R. Kampfner (W&C) and R. Szuba (W&C) re: Foxconn	D Turetsky	4.70	8,930.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Plan issues (0.3); call with R. Szuba (W&C) re: confirmation order issues (0.1); call with D. Kim (W&C) re: Plan voting issues (0.1); call with M. Patterson (Womble) re: confirmation issues (0.2); further analysis re: discharge issues (0.6); further analysis re: DiamondPeak director Plan issues (0.3); call with J. Zakia (W&C) re: derivative claims release issues (0.1).			
22 February 2024	Call with R. Kampfner, R. Szuba re: confirmation matters and open issues re: same (0.4); further revise draft confirmation brief (1.3); call with D. Turetsky re: voting issues (0.1); review revised Plan provisions for same (0.4); correspond with R. Szuba re: same (0.1).	D Kim	2.30	3,289.00
22 February 2024	Attend confirmation strategy call with R. Kampfner and D. Kim (0.4); call with counsel to Foxconn re: SEC proposed change (0.3); review Plan related to same (0.1); draft correspondence to KCC re: voting report and declaration (0.1); research re: discharge (0.2); revise confirmation brief (0.8); correspond with D. Kim re: same (0.2); draft correspondence to A. Estrada re: voting declaration (0.2); draft correspondence to D. Ninivaggi re: balloting issue (0.1); draft correspondence to J. Herz (Foxconn) re: confirmation order (0.1); revise confirmation order (0.1); draft correspondence to S. Vasser re: confirmation order (0.1).	R Szuba	2.70	3,483.00
23 February 2024	Confer with D. Turetsky re: Plan issues.	J Zakia	0.20	400.00
23 February 2024	Continued work on Plan supplement and related issues (1.6); review and revise Plan to address SEC and Foxconn comments (0.7); review/comment Ninivaggi Declaration (0.6); call with Allen & Overy (D. Guyder, J. Herz) and W&C (D. Turetsky and R. Szuba) re: Foxconn Plan issues (0.1); further calls with D. Turetsky (W&C) re: Plan/confirmation issues (0.8).	R Kampfner	3.80	7,220.00
23 February 2024	Calls with B. Silverberg (Brown Rudnick) re: Plan issues (0.2); calls with J. Zakia (W&C) re: Plan issues (0.2); call with Allen & Overy (D. Guyder, J. Herz) and W&C (R. Kampfner and R. Szuba) re: Foxconn Plan issues (0.1); further calls with R. Kampfner (W&C) re: Plan/confirmation issues (0.8); calls with S. Dwoskin (Brown Rudnick) re: discharge issues (0.2); email to S. Dwoskin (Brown Rudnick) and others re: discharge issues (0.2); calls with D. Baddley (SEC) re: SEC Plan issues (0.2); further research/analysis re: discharge issues (1.7).	D Turetsky	3.60	6,840.00
23 February 2024	Review/comment Plan supplement documents (0.7); review and revise draft first supplemental Plan supplement notice (0.1).	D Kim	0.80	1,144.00
23 February 2024	Revise confirmation order (0.6); draft correspondence to Creditors' Committee re: same (0.1); draft correspondence to counsel to Director re: confirmation order/Plan (0.4); compile Plan supplement (0.7); draft correspondence to W&C team re: same (0.1); draft correspondence to A. Kroll re: post-effective date	R Szuba	5.60	7,224.00

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	debtor amount (0.1); draft/revise confirmation brief (2.4); research re: same (0.7); revise declarations in support of confirmation (0.3); draft correspondence to D. Turetsky and R. Kampfner re: confirmation brief and declarations in support of confirmation (0.2).			
24 February 2024	Review and revise confirmation brief and related declarations (5.2); calls with D. Turetsky (W&C) re: Plan issues (0.5) and confirmation brief (0.1).	R Kampfner	5.80	11,020.00
24 February 2024	Calls with R. Kampfner (W&C) re: Plan issues (0.5) and confirmation brief (0.1); call with R. Szuba (W&C) re: confirmation order issues (0.1); further review and comment re: confirmation order (0.3); further analysis re: issues re: Singh Plan objection (0.2); emails to R. Szuba (W&C) re: confirmation order/confirmation issues (0.4); emails to D. Kim (W&C) and R. Szuba (W&C) re: confirmation brief (0.1); calls with R. Winning (M3) re: post effective date debtor issues (0.1); email to L. Oswell (S&C) re: DiamondPeak director Plan issues (0.1); call with B. Silverberg (Brown Rudnick) re: confirmation order issues (0.1); review and comment re: confirmation brief (2.4); further research/analysis re: discharge issues in connection with UST Plan objection (2.0).	D Turetsky	6.40	12,160.00
24 February 2024	Review and analyze draft class notices re: first supplemental Plan supplement (0.5); analyze revisions to draft confirmation brief (0.5); correspond with R. Szuba re: same (0.1); further revise draft confirmation brief based on same (0.3).	D Kim	1.40	2,002.00
24 February 2024	Revise confirmation order (0.9); draft correspondence to Creditors' Committee re: same (0.1); draft correspondence to Equity Committee re: same (0.1); draft correspondence to SEC re: same (0.1); draft correspondence to counsel to directors and officers re: same (0.1); draft correspondence to Ohio Plaintiffs re: same (0.1); draft correspondence to Foxconn re: same (0.1); draft correspondence to Company re: same (0.1); revise confirmation brief (1.6); call with D. Turetsky re: confirmation issues (0.1); revise Ninivaggi declaration (0.3); draft correspondence to D. Turetsky and R. Kampfner re: confirmation brief and declarations in support of same (0.2).	R Szuba	3.80	4,902.00
25 February 2024	Review revised confirmation brief and related declarations (1.0); confer with D. Turetsky re: discharge issues (0.2).	R Kampfner	1.20	2,280.00
25 February 2024	Email to M. Patterson (Womble) re: confirmation issues (0.1); email to R. Kampfner (W&C) re: discharge issues (0.1); further review and comment re: confirmation brief (2.2); further research/analysis re: Plan discharge issues (1.2); call with R. Kampfner (W&C) re: discharge issues (0.2); calls with R. Szuba (W&C) re: confirmation issues (0.2); email to D. Ninivaggi (Lordstown) confirmation order issues (0.1); review and comment re: Ninivaggi declaration (0.5); review and comment re: Kroll declaration (0.7).	D Turetsky	5.30	10,070.00

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25 February 2024	Further revise confirmation brief based on comments received (0.7); further revise draft Kroll declaration in support of confirmation (0.2).	D Kim	0.90	1,287.00
25 February 2024	Draft confirmation order (0.9); draft correspondence to R. Kampfner and D. Turetsky re: same (0.5); revise Kroll Declaration in support of confirmation (0.2); draft confirmation brief (1.1); call with D. Turetsky re: confirmation issues (0.2); draft correspondence to Company re: same (0.2); draft correspondence to Equity Committee re: same (0.1); draft correspondence to Creditors' Committee re: same (0.1).	R Szuba	3.30	4,257.00
26 February 2024	Confer with D. Turetsky re: Plan strategy (0.4); further analysis re: same (0.2); review declarations in support of confirmation (0.9).	J Zakia	1.50	3,000.00
26 February 2024	Review and comment re: Jefferies declaration (0.4) and Kroll declaration (0.2); further review of confirmation brief (1.1); calls with D. Turetsky (W&C) re: Plan issues (1.4); call with D. Baddley (SEC), Allen & Overy (D. Guyder and C. Newcomb), Lowenstein (M. Etkin), and W&C (D. Turetsky and R. Szuba) re: Plan/confirmation order issues (0.3); call with W&C team (R. Szuba, D. Kim, and D. Turetsky) re: Plan/confirmation strategy issues (0.6); further call with D. Turetsky (W&C) and S. Dwoskin (W&C) re: discharge issues (0.2); call with R. Szuba re: Plan Supplement (0.1); further analysis re: resolution of Foxconn/SEC Plan issues (1.6); further analysis re: discharge issues (0.3); further analysis re: additional Plan issues (0.4).	R Kampfner	6.60	12,540.00
26 February 2024	Calls with M. Patterson (Womble) re: Plan/confirmation issues (0.2); calls with J. Zakia (W&C) re: Plan/confirmation issues (0.4); call with R. Szuba (W&C) re: Plan issues (0.2); calls with R. Kampfner (W&C) re: Plan issues (1.4); email to S. Reil (Young Conaway) re: Young Conaway director Plan issues (0.1); call with D. Baddley (SEC), Allen & Overy (D. Guyder and C. Newcomb), Lowenstein (M. Etkin), and W&C (R. Kampfner and R. Szuba) re: Plan/confirmation order issues (0.3); call with W&C team (R. Szuba, D. Kim, and R. Kampfner) re: Plan/confirmation strategy issues (0.6); further call with R. Kampfner (W&C) and S. Dwoskin (W&C) re: discharge issues (0.2); further research/analysis re: discharge issues (1.6).	D Turetsky	5.00	9,500.00
26 February 2024	Review/comment notice of filing modified Plan (0.1); review/comment notice of filing revised confirmation order (0.1); correspond with C. Giobbe (WBD) re: same (0.1); call with D. Turetsky, R. Kampfner, R. Szuba re: confirmation issues and strategy (0.6); further review and draft portions of confirmation brief (2.2); confer with R. Szuba re: same (0.2); review and revise Ninivaggi confirmation declaration (0.1); review and revise Kroll confirmation declaration (0.1).	D Kim	3.50	5,005.00
26 February 2024	Draft correspondence to counsel to Equity Committee	R Szuba	5.90	7,611.00

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RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	re: confirmation brief and supporting declarations (0.2); draft correspondence to Creditors' Committee re: same (0.1); draft correspondence to Womble re: same (0.1); correspond with D. Turetsky and D. Kim re: Plan Supplement (0.2); draft correspondence to Equity Committee re: Litigation Trust Agreement (0.2); call with D. Turetsky re: discharge and other confirmation issues (0.2); call with R. Kampfner re: Plan Supplement (0.1); call with SEC, Foxconn, and Ohio Plaintiffs re: Plan language (0.3); revise confirmation order (0.3); draft correspondence to D. Turetsky re: same (0.2); draft correspondence to L. Mezei and P. Strom re: research re: discharge and 510(b) confirmation issues (0.3); draft correspondence to A. Kroll re: Ninivaggi declaration in support of confirmation (0.2); draft correspondence to Equity Committee and Creditors' Committee re: confirmation order language re: directors and officers (0.2); draft Plan supplement notice re: GUC Reserve breakdown (0.6); draft correspondence to D. Turetsky and W&C team re: same (0.2); prepare Plan supplement for filing (0.9); revise Plan (0.5); revise confirmation order (0.3); draft correspondence to Creditors' Committee re: Plan, confirmation order, and Plan supplement filing (0.2); draft correspondence to Equity Committee re: same (0.1); draft correspondence to SEC re: same (0.1); draft correspondence to Foxconn re: same (0.1); draft correspondence to Ohio Plaintiffs re: same (0.1); draft correspondence to Company re: same (0.1); draft correspondence to Womble team re: same (0.1).			
27 February 2024	Confer with D. Turetsky re: confirmation issues.	J Zakia	0.80	1,600.00
27 February 2024	Continued work on Plan issues, including review of Foxconn treatment re: Plan (1.3); review and revise confirmation order (0.7); continued review of brief and declarations (0.6); review and revise Plan based on Creditors' Committee comments and Equity Committee Comments (0.7); calls with D. Turetsky (W&C) re: Plan/confirmation issues (1.6); calls with W&C team (R D. Turetsky, D. Kim, R. Szuba re: Plan issues (1.3); further call with S. Dwoskin (Brown Rudnick) and D. Turetsky (W&C) re: Plan issues (0.3).	R Kampfner	6.50	12,350.00
27 February 2024	Emails to R. Szuba (W&C) and D. Kim (W&C) re: Plan/confirmation issues (0.2); calls with S. Dwoskin (Brown Rudnick) re: Plan/discharge issues (0.4); calls with R. Kampfner (W&C) re: Plan/confirmation issues (1.6); email to S. Dwoskin (Brown Rudnick) re: Young Conaway director Plan issues (0.2); call with J. Zakia (W&C) re: confirmation issues (0.8); calls with S. Riel (Young Conaway) re: Plan issues (0.2); calls with W&C team (R. Kampfner, D. Kim, R. Szuba re: Plan issues (1.3); further review and comment re: confirmation order (0.6); emails to D. Baddley (SEC) re: confirmation order issues (0.2); call with D. Baddley (SEC) re: Plan/confirmation issues (0.2); call with B. Silverberg (Brown Rudnick) re: Plan/confirmation matters (0.1); call with M. Patterson (Womble) re: confirmation issues (0.2); review and comment re: Gallagher declaration (0.4); further call with S. Dwoskin (Brown Rudnick) and R. Kampfner (W&C) re:	D Turetsky	10.20	19,380.00

WHITE & CASE

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Plan issues (0.3); further research/analysis re: discharge issues (2.1); further review and comment re: Plan language (0.4); further research re: fair and equitable issues (0.6); further analysis re: additional Plan issues (0.2); call with D. Ninivaggi (Lordstown) re: Plan issues (0.2).			
27 February 2024	Team conference calls with D. Turetsky, R. Kampfner, R. Szuba re: confirmation strategies and finalization of Plan confirmation-related documents (1.3); prepare final confirmation filing checklist (0.1); correspond with R. Kampfner, D. Turetsky, R. Szuba and Womble team re: same (0.1); review and provide comments to further revised Plan filing notices (0.1); further review and revise portions of confirmation brief (1.8); further review and revise Ninivaggi declaration (0.7); further review and revise Kroll declaration (0.5); further review and revise M3 declaration (0.9); further review and revise draft Jefferies declaration (0.5); further revise draft reply in support of exclusivity motion (0.6); correspond with D. Turetsky, R. Kampfner re: same (0.1).	D Kim	6.70	9,581.00
27 February 2024	Revise confirmation brief (1.1); revise Ninivaggi declaration (0.8); draft correspondence to D. Ninivaggi and Company re: Ninivaggi declaration (0.5); draft correspondence to Equity Committee and Creditors' Committee re: language for confirmation order re: former directors and officers (0.3); review correspondence from D. Turetsky re: same (0.1); calls with D. Turetsky, R. Kampfner, and D. Kim re: confirmation brief, Plan, confirmation order and related issues (1.3); draft correspondence to D. Turetsky and R. Kampfner re: Plan waterfall (0.1); draft correspondence to Creditors' Committee and Equity Committee re: Plan, confirmation order, and Plan supplement filing (0.2); draft/revise confirmation order (1.3); draft correspondence to W&C team re: same (0.5); draft correspondence to S. Reil re: confirmation order language (0.2); call with D. Turetsky re: same (0.1); draft correspondence to Creditors' Committee re: same (0.2); draft correspondence to Equity Committee re: same (0.1); review confirmation order edits from SEC (0.1); draft correspondence to D. Turetsky and W&C team re: same (0.1); draft and review correspondence to Equity Committee re: retained causes of action Plan supplement (0.1); draft correspondence to W&C team re: same (0.1); draft correspondence to Foxconn re: voting declaration (0.1); draft correspondence to company re: confirmation order language re: notice insert (0.1); review research from L. Mezei re: discharge issue (0.3); draft correspondence to L. Mezei re: same (0.1); draft correspondence to D. Turetsky re: same (0.2); draft correspondence to A. Kroll re: confirmation brief matters (0.2); comment re: new organizational documents (0.2); draft correspondence to Equity Committee re: same (0.1); compile Plan supplement for filing (0.3); draft Plan supplement notice re: same (0.4); revise Plan (0.4); prepare Plan for filing (0.3); draft correspondence to Equity Committee re: Plan supplement filing (0.2); draft correspondence to Company re: Plan, confirmation order filings (0.6); draft	R Szuba	11.90	15,351.00

WHITE & CASE

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	correspondence to Equity Committee and Creditors' Committee re: same (0.4); draft correspondence to Womble re: Plan, confirmation order, and Plan supplement filing (0.3); draft correspondence to SEC re: same (0.2); draft correspondence to company re: as-filed Plan, confirmation order, and Plan supplement (0.3).			
27 February 2024	Research re: discharge issues in connection with anticipated contested confirmation hearing.	L Mezei	6.20	7,192.00
28 February 2024	Confer with D. Turetsky re: Plan/confirmation strategy (0.8); review confirmation brief (0.9).	J Zakia	1.70	3,400.00
28 February 2024	Review and revise Finger/Hamilton declaration (0.6); call with Mr. Hamilton re: declaration (0.4); review/analysis changes in Foxconn treatment requested by Equity Committee (1.0); review of confirmation brief (0.9); review exclusivity reply (0.9); calls with D. Turetsky (W&C) re: Plan/confirmation matters (0.5); call with D. Turetsky (W&C) and R. Szuba (W&C) re: Plan/confirmation matters (0.3).	R Kampfner	4.60	8,740.00
28 February 2024	Calls with J. Zakia (W&C) re: Plan/confirmation issues (0.8); call with A. Kroll (Lordstown) re: confirmation brief issues (0.1); further review and comment re: confirmation brief (2.4); calls with R. Kampfner (W&C) re: Plan/confirmation matters (0.5); further research/analysis re: discharge issues (2.2); further analysis re: additional Plan confirmation issues (0.9); calls with S. Dwoskin (Brown Rudnick) re: Plan/confirmation issues (0.3); call with R. Hamilton (Jefferies) re: Jefferies declaration (0.1); further review and comment re: Jefferies declaration (0.2); further review and comment re: Gallagher declaration (0.2); emails R. Szuba (W&C) and D. Kim (W&C) re: confirmation brief (0.2); review and comment re: reply in support of exclusivity (0.2); further call with R. Kampfner (W&C) and R. Szuba (W&C) re: Plan/confirmation matters (0.3); further call with D. Kim (W&C) and (partial) R. Szuba (W&C) and D. Kim (W&C) re: confirmation issues (0.4).	D Turetsky	8.80	16,720.00
28 February 2024	Further revise confirmation filing checklist (0.4); revise Plan confirmation closing checklists (0.2); analyze case law and conduct further research re: discharge issues (1.6); correspond with R. Szuba re: outstanding confirmation issues (0.3); calls with D. Turetsky, R. Szuba (partial) re: confirmation preparation (0.4); review and revise draft Gallagher declaration (0.5); correspond with counsel for Equity Committee re: same (0.1); review revised draft Hamilton declaration (0.3); finalize draft exclusivity reply (0.5); correspond with D. Turetsky, R. Kampfner re: same (0.1); further revise comments to Equity Committee confirmation joinder (0.3); further review revised confirmation brief (0.7).	D Kim	5.40	7,722.00
28 February 2024	Draft confirmation brief (3.4); research re: same (1.5); draft correspondence to D. Ninivaggi, A. Kroll, M. Leonard, and E. Hightower re: confirmation brief and	R Szuba	7.80	10,062.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	supporting declarations (0.3); draft correspondence to D. Turetsky and R. Kampfner re: same and open issues (0.5); confer with D. Kim and D. Turetsky re: confirmation research (0.2); call with D. Turetsky and R. Kampfner re: confirmation issues (0.3); draft correspondence to A. Kroll and Silverman team re: confirmation brief/declaration issues (0.2); call with A. Crnkovich re: closing issues (0.1); draft correspondence to R. Kampfner and D. Turetsky re: same (0.1); review correspondence re: Plan insurance issues and draft confirmation order insert re: same (0.2); review Gallagher confirmation declaration (0.2); revise Kroll confirmation declaration (0.3); correspond with A. Kroll re: same (0.1); draft correspondence to Creditors' Committee re: documents in support of confirmation (0.1); draft correspondence to Equity Committee re: documents in support of confirmation (0.1); review correspondence from D. Kim re: open issues (0.1); draft correspondence to Womble team re: confirmation papers (0.1).			
28 February 2024	Continued research re: discharge issues.	L Mezei	2.70	3,132.00
29 February 2024	Review and revise confirmation brief (1.8), confer with D. Turetsky re: confirmation issues (0.4); confer with R. Kampfner re: confirmation issues (0.1), review retained causes of action schedule, confer with Equity Committee counsel re: same (0.6), review confirmation declarations (0.6).	J Zakia	3.50	7,000.00
29 February 2024	Further revise confirmation brief (2.6); revise Hamilton Declaration (1.0); revise exclusivity reply (0.8); analysis re: related confirmation issues (0.2); calls with D. Turetsky (W&C) re: confirmation issues (0.8); call with W&C team (D. Kim, R. Szuba, and R. Kampfner) re: Plan/confirmation issues (0.4); confer with J. Zakia re: confirmation issues (0.1).	R Kampfner	5.90	11,210.00
29 February 2024	Calls with J. Zakia (W&C) re: confirmation issues (0.4); calls with R. Kampfner (W&C) re: confirmation issues (0.8); email to D. Ninivaggi (Lordstown) re: confirmation brief issues (0.2); call with B. Hackman (US Trustee) re: US Trustee Plan issues (0.6); emails to S. Dwoskin (Brown Rudnick) re: confirmation issues (0.1); emails to S. Vasser (Dechert) re: confirmation issues (0.1); email to J. Zakia (W&C) and R. Kampfner (W&C) re: US Trustee Plan issues (0.1); calls with R. Hamilton (Jefferies) re: Jefferies declaration (0.4); call with B. Silverberg (Brown Rudnick) re: confirmation issues (0.1); review and comment re: Equity Committee confirmation brief/joinder (0.4); call with A. Kroll (Lordstown) re: confirmation brief issues (0.1); review and comment re: revised Gallagher declaration (0.2); email to R. Szuba (W&C) re: confirmation brief issues (0.1); further review and comment re: reply in support of exclusivity (0.3); emails to M. Patterson (Womble) re: exclusivity reply (0.1); review retained causes of action schedule (0.2); call with W&C team (D. Kim, R. Szuba, and R. Kampfner) re: Plan/confirmation issues (0.4); call with D. Baddley (SEC) re: Plan/confirmation issues (0.1); further call with B. Silverberg (Brown Rudnick) and (partial) J.	D Turetsky	8.40	15,960.00

WHITE & CASE

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Zakia (W&C) re: Plan/confirmation issues (0.5); further research/analysis re: discharge issues (1.1); further analysis re: additional confirmation issues (0.7); review and comment re: Debtors' confirmation brief (0.9); further review Jefferies declaration (0.2); call with M. Patterson (Womble) re: confirmation brief issues (0.2); calls with R. Szuba (W&C) re: Plan issues (0.1).			
29 February 2024	Team call with D. Turetsky, R. Kampfner, R. Szuba re: confirmation filing and related matters (0.4); further comment/revise draft Gallagher declaration based on comments received (0.3); review and revise second supplemental Plan supplement notice (0.4); review and analyze revisions to draft confirmation order (0.3); finalize exclusivity reply (0.1); correspond with M. Patterson and Womble team re: filing of same (0.1); correspond with counsel for Ohio Lead Plaintiff re: Plan supplement notices (0.1); review draft of same (0.7); review/comment confirmation brief (1.5); correspond with A. Estrada (KCC) re: confirmation preparation (0.1); finalize Plan supplement documents (0.6); further review and revise draft notice of confirmation order (0.1); revise confirmation checklist (0.2).	D Kim	4.90	7,007.00
29 February 2024	Revise analysis to D. Turetsky re: 510(b) treatment issues (0.2) and follow up with D. Turetsky re: same (0.2); review research from P. Strom re: same (0.4); draft correspondence to Creditors' Committee and Equity Committee re: Plan Supplement (0.3); draft Plan supplement notice (0.7); draft correspondence to Womble re: same (0.2); draft correspondence to counsel to Equity Committee and Creditors' Committee re: same (0.2); review retained causes of action Plan supplement (0.1); draft correspondence to W&C team re: same (0.1); further draft confirmation brief (2.7); draft declarations in support of confirmation (0.9); draft correspondence to D. Ninivaggi, A. Kroll, and Company re: confirmation brief and declarations (0.3); draft reservation of rights and disclosure for Plan supplement notice re: same (0.2); correspond with D. Turetsky and R. Kampfner re: same (0.2); draft correspondence to Womble team coordinating filing of confirmation brief, Plan supplement, and confirmation order (0.3); draft correspondence to Company and W&C team re: as-filed documents (0.4); draft correspondence to R. Hamilton re: declaration (0.2); draft correspondence to Equity Committee re: Gallagher declaration (0.2); correspond with Womble team re: confirmation brief and declarations re: same (0.4); review Creditors' Committee and Equity Committee joinders in support of confirmation (0.2); review solicitation procedures with respect to reclassification of equity (0.2); call with D. Turetsky re: same (0.1); plan strategy call with D. Turetsky, R. Kampfner, and D. Kim (0.5).	R Szuba	9.20	11,868.00
SUBTOTAL: Exclusivity, Plan & Disclosure Statement			363.80	601,463.00

Executory Contracts & Unexpired Leases

WHITE & CASE

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 February 2024	Analysis re: issues re: registration rights agreement inquiry raised by Equity Committee/company (0.2); emails to F. He (W&C) re: registration rights agreement inquiry raised by Equity Committee/company (0.2); call with F. He (W&C) re: registration rights agreement issues (0.2).	D Turetsky	0.60	1,140.00
2 February 2024	Call/confer with D. Turetsky re: registration rights agreement issues (0.2); analysis re: registration rights agreement issues (0.2); correspondence with D. Turetsky re: same (0.1); confer with M. Leonard (Baker) re: registration rights agreement issues (0.2).	F He	0.70	1,029.00
5 February 2024	Review CNO for motions to extend removal period and to assume leases (0.2); confer with S. Ludovici re: case admin issues per inquiry from Company (0.1).	F He	0.30	441.00
7 February 2024	Review correspondence with landlord (0.2) and confer with M. Leonard (Baker) re: same (0.3).	F He	0.50	735.00
13 February 2024	Confer with R. Szuba re: landlord's response re: security deposit (0.3); confer with D. Turetsky re: same. (0.2).	F He	0.50	735.00
13 February 2024	Review correspondence from counsel to Landlord (0.1); draft correspondence to A. Kroll re: same (0.2).	R Szuba	0.30	387.00
14 February 2024	Draft correspondence to A. Kroll and M. Port re: request to landlord to return security deposit (0.1); review issues re: same (0.2).	R Szuba	0.30	387.00
15 February 2024	Review rejection motion, order, and docket re: MEDC rejection (0.1); draft correspondence to A. Crnkovich re: same (0.1); draft correspondence to A. Kroll re: rejection pursuant to Plan (0.2).	R Szuba	0.40	516.00
21 February 2024	Draft correspondence to A. Kroll and Silverman team re: rejected contracts Plan supplement.	R Szuba	0.10	129.00
27 February 2024	Confer with D. Kim re: assumption motion issues.	F He	0.30	441.00
27 February 2024	Review issues re: assumption and rejection of contracts in connection with Plan (0.1); draft correspondence to D. Turetsky and W&C team re: same (0.1).	R Szuba	0.20	258.00
SUBTOTAL: Executory Contracts & Unexpired Leases			4.20	6,198.00

Hearings & Court Matters

7 February 2024	Correspond with F. He re: February 22 hearing matters (0.1); review and revise pending workstreams tracker (0.1).	D Kim	0.20	286.00
9 February 2024	Review notice to continue confirmation hearing (0.2); confer with M. Patterson (Womble) re: same (0.2).	F He	0.40	588.00

WHITE & CASE

LORDSTOWN MOTORS CORP.

RE: Project Pickup

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 February 2024	Call with M. Patterson (Womble) re: exclusivity hearing.	D Turetsky	0.10	190.00
13 February 2024	Correspondence with M. Patterson (WBD) and D. Turetsky re: continued hearing for exclusivity (0.2); review draft certification of counsel re: continued hearing (0.2).	D Kim	0.40	572.00
20 February 2024	Review draft February 22 hearing agenda (0.1); correspond with M. Patterson re: same (0.1); review hearing cancellation notice (0.1).	D Kim	0.30	429.00
22 February 2024	Correspond with M. Patterson (WBD) re: omnibus hearing matter.	D Kim	0.10	143.00
29 February 2024	Review and revise draft confirmation hearing agenda (0.3); correspond with M. Patterson (WBD) re: same (0.1); research and draft outlines in preparation for confirmation hearing (1.2).	D Kim	1.60	2,288.00
29 February 2024	Coordinate logistics for confirmation hearing.	R Szuba	0.20	258.00
SUBTOTAL: Hearings & Court Matters			3.30	4,754.00

Insurance Issues

1 February 2024	Further analysis re: D&O insurance issues.	D Turetsky	0.20	380.00
12 February 2024	Review issue re: former D&Os request for relief from stay to pursue insurance (0.2); draft correspondence to D. Turetsky and R. Kampfner re: same (0.1).	R Szuba	0.30	387.00
21 February 2024	Further analysis re: D&O insurance issues.	D Turetsky	0.30	570.00
SUBTOTAL: Insurance Issues			0.80	1,337.00

Litigation

5 February 2024	Review draft DiamondPeak settlement.	D Turetsky	0.70	1,330.00
6 February 2024	Confer with D. Turetsky re: DiamondPeak litigation/settlement issues.	J Zakia	0.10	200.00
6 February 2024	Call with J. Zakia (W&C) re: DiamondPeak settlement issues.	D Turetsky	0.10	190.00
7 February 2024	Email to D. Kovsky (Troutman) and F. Lawall (Troutman) re: DiamondPeak settlement.	D Turetsky	0.10	190.00
13 February 2024	Confer with D. Turetsky re: DiamonPeak settlement issues (0.1); further analysis re: DiamondPeak issues (0.6).	J Zakia	0.70	1,400.00
13 February 2024	Calls with J. Zakia (W&C) re: DiamondPeak settlement issues.	D Turetsky	0.10	190.00

LORDSTOWN MOTORS CORP.

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23 February 2024	Confer with D. Turetsky re: RIDE litigation matters (0.3); further analysis re: litigation matters (0.3).	J Zakia	0.60	1,200.00
23 February 2024	Review and analysis re: defendants' motion to dismiss RIDE litigation (0.4); call with J. Zakia (W&C) re: defendants' motion to dismiss RIDE litigation (0.3).	D Turetsky	0.70	1,330.00
SUBTOTAL: Litigation			3.10	6,030.00

Professional Retention & Fees – W&C

2 February 2024	Review CNO for W&C monthly fee application (0.1); emails with D. Turetsky and with C. Giobbe (WBD) re: same (0.1).	S Ludovici	0.20	276.00
5 February 2024	Review D. Turetsky edits to December fee application (0.1); review pro forma time entries or expense entries for January monthly fee statement for privilege and confidentiality (0.5); email with staff re: pro forma for fee application (0.1).	S Ludovici	0.70	966.00
6 February 2024	Draft December monthly fee application.	S Ludovici	0.50	690.00
8 February 2024	Review and comment re: December fee application.	D Turetsky	0.30	570.00
8 February 2024	Revise December monthly fee application (0.8); email with D. Turetsky re: same (0.3).	S Ludovici	1.10	1,518.00
9 February 2024	Draft interim fee application.	S Ludovici	0.30	414.00
12 February 2024	Review final fee application process (0.2); email with A. Padmanabhan re: drafting same (0.2).	S Ludovici	0.40	552.00
13 February 2024	Review and comment re: W&C December fee application (0.4); emails to S. Ludovici (W&C) re: W&C December fee application (0.2).	D Turetsky	0.60	1,140.00
13 February 2024	Emails with D. Turetsky re: December fee application (0.1); revise December monthly fee application per D. Turetsky comments (0.1); review pro forma time entries or expense entries for January monthly fee statement for privilege and confidentiality (2.5); email with WBD re: filing W&C December monthly fee application (0.1); revise 2d interim fee application (0.7).	S Ludovici	3.50	4,830.00
14 February 2024	Review and comment re: W&C second interim fee application (0.3); email to S. Ludovici (W&C) re: same (0.1).	D Turetsky	0.40	760.00
14 February 2024	Revise 2d interim fee application (0.5); email with D. Turetsky re: comments to same (0.3); emails with P. Strom and L. Mezei re: reviewing same (0.1).	S Ludovici	0.90	1,242.00
15 February 2024	Review pro forma time entries or expense entries for Jan monthly fee statement for privilege and confidentiality (0.5); revise January monthly fee	S Ludovici	0.80	1,104.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	application (0.3).			
20 February 2024	Revise January fee application.	S Ludovici	0.80	1,104.00
21 February 2024	Review January fee application.	S Ludovici	0.20	276.00
SUBTOTAL: Professional Retention & Fees – W&C			10.70	15,442.00

Professional Retention & Fees – Other

7 February 2024	Prepare OCP monthly report and email to M Port re: same.	S Ludovici	0.10	138.00
8 February 2024	Review KPMG interim fee application (0.3); emails with KPMG and with WBD re: same (0.2).	S Ludovici	0.50	690.00
9 February 2024	Follow up with KPMG re: interim fee application (0.1); review Silverman 2d interim fee application (0.2); emails with D. Tsitsis re: same (0.1).	S Ludovici	0.40	552.00
14 February 2024	Review Jefferies interim fee application.	S Ludovici	0.10	138.00
20 February 2024	Review and comment on Silverman January fee application.	S Ludovici	0.50	690.00
24 February 2024	Email with W. McManus (CSB) re: case status (0.1); email with R. Szuba re: same (0.1).	S Ludovici	0.20	276.00
26 February 2024	Review KCC monthly fee application (0.1); review KPMG's 5th monthly fee application (0.1); email to W. McManus (CSB) re: Plan status and professional fees (0.1).	S Ludovici	0.30	414.00
SUBTOTAL: Professional Retention & Fees – Other			2.10	2,898.00

Reports, Schedules & U.S. Trustee Issues

1 February 2024	Review audit write-up (0.2); call with M. Leonard re: same (0.2).	R Szuba	0.40	516.00
5 February 2024	Call with R. Szuba (W&C) re: 10-K issues (0.1); further review 10-K (0.7); further analysis re: 10-K issues (0.3).	D Turetsky	1.10	2,090.00
5 February 2024	Review and comment on 10-K.	F He	2.30	3,381.00
5 February 2024	Call with D. Turetsky re: 10-K (0.1); review latest 10-K draft (0.2); correspond with F. He re: same (0.1).	R Szuba	0.40	516.00
6 February 2024	Call with R. Szuba (W&C) re: 10-K issues (0.2); further review and comment re: 10-K (1.3).	D Turetsky	1.50	2,850.00
6 February 2024	Confer with M. Leonard (Company) re: 10-K issues and research re: same.	F He	0.50	735.00

WHITE & CASE

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RE: Project Pickup

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
6 February 2024	Call with D. Turetsky re: 10-K (0.1); review same and draft correspondence to J. Spreen and Baker re: same (0.1); call with J. Spreen re: same (0.1); revise 10-K (0.8); draft correspondence to J. Spreen and M. Leonard re: same (0.1).	R Szuba	1.20	1,548.00
7 February 2024	Further analysis re: 10-K issues (0.2); emails to A. Kroll (Lordstown) re: 10-K issues (0.1); call with R. Szuba (W&C) re: 10-K issues (0.1).	D Turetsky	0.40	760.00
7 February 2024	Review email from A. Kroll re: 10K reporting re: claim reserve (0.1); draft correspondence to A. Kroll re: same (0.1).	R Szuba	0.20	258.00
14 February 2024	Call with A. Ericksen (W&C) re: 10-K issues (0.1); call with R. Szuba (W&C) re: 10-K issues (0.1); email to J. Spreen (Baker Hostetler) re: 10-K issues (0.1).	D Turetsky	0.30	570.00
14 February 2024	Discuss 10-K with D. Turetsky.	A Ericksen	0.10	172.00
14 February 2024	Draft correspondence to J. Spreen re: 8-K re: Plan (0.1); draft correspondence to M. Leonard re: 10-K language describing Plan (0.1).	R Szuba	0.20	258.00
15 February 2024	Review correspondence from M. Leonard re: 10-K provisions re: Plan (0.3); draft correspondence to M. Leonard re: same (0.5); review Plan provisions re: same (0.3).	R Szuba	1.10	1,419.00
19 February 2024	Emails to M. Leonard (Baker) re: 10-K.	D Turetsky	0.20	380.00
20 February 2024	Email to M. Leonard (Baker) re: 10-K issues (0.1); call with A. Ericksen (W&C) re: 10-K issues (0.1); call with S. Dwoskin (Brown Rudnick) re: 10-K issues (0.1); call with M. Leonard (Baker) and J. Spreen (Baker) re: 10-K issues (0.2).	D Turetsky	0.50	950.00
20 February 2024	Discuss disclosure considerations with D. Turetsky.	A Ericksen	0.10	172.00
20 February 2024	Review draft January MOR for LMC (0.1); review draft January MOR for LEVS (0.1); review draft January MOR for LEVC (0.1); correspond with M. Port re: same (0.1); correspond with M. Patterson re: filing status (0.1).	D Kim	0.50	715.00
21 February 2024	Correspond with M. Port re: January MORs (0.1); correspond with M. Patterson (WBD) re: same (0.1).	D Kim	0.20	286.00
21 February 2024	Review 10-K language re: Plan and confirmation order (0.2); draft correspondence to M. Leonard re: same (0.2).	R Szuba	0.40	516.00
23 February 2024	Analyze question re: 10K issues.	G Pryor	0.50	1,075.00
23 February 2024	Emails to B. Silverberg (Brown Rudnick) and S. Dwoskin (Brown Rudnick) re: 10-K (0.1); emails to M. Leonard (Baker) and J. Spreen (Baker) re: 10-K (0.2);	D Turetsky	3.70	7,030.00

WHITE & CASE

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	calls with D. Ninivaggi (Lordstown) re: 10-K (0.4); calls with B. Silverberg (Brown Rudnick) re: 10-K (0.2); emails to A. Ericksen (W&C) and G. Pryor (W&C) re: 10-K (0.3); call with A. Ericksen (W&C) re: 10-K issues (0.2); call with Brown Rudnick (J. Cushing, W. Gallagher, B. Silverberg, S. Dwoskin), D. Ninivaggi (Lordstown), Baker Hostetler (J. Spreen, M. Leonard) re: 10-K issues (0.7); call with J. Spreen (Baker) re: 10-K issues (0.2); further analysis re: 10-K issues (1.4).			
23 February 2024	Analyze considerations re: 10 issues in connection with SEC Rules.	A Ericksen	0.70	1,204.00
23 February 2024	Revise 10-K (0.4); confer with D. Turetsky re: same (0.1).	R Szuba	0.50	645.00
24 February 2024	Call with R. Szuba (W&C) re: 10-K issues (0.1); call with R. Szuba (W&C) re: 10-K (0.2); review and comment re: 10-K (0.8).	D Turetsky	1.10	2,090.00
24 February 2024	Draft correspondence to D. Turetsky and R. Kampfner re: 10-K (0.1); draft correspondence to M. Leonard re: same (0.2); review same (0.2).	R Szuba	0.50	645.00
25 February 2024	Email to R. Szuba (W&C) re: 10-K issues (0.2); emails to M. Leonard (Baker) and J. Spreen (Baker) re: 10-K issues (0.1).	D Turetsky	0.30	570.00
25 February 2024	Revise 10-K (0.2); draft correspondence to J. Spreen and M. Baker re: same (0.1).	R Szuba	0.30	387.00
26 February 2024	Review 10-K disclosure issues (0.5); correspondence with D. Turetsky and A. Ericksen re: same (0.1).	G Pryor	0.60	1,290.00
26 February 2024	Calls with D. Ninivaggi (Lordstown) re: 10-K issues (0.5); emails to A. Ericksen (W&C) and G. Pryor (W&C) re: 10-K issues (0.3); calls with A. Ericksen (W&C) re: 10-K issues (0.7); calls with J. Spreen (Baker) re: 10-K issues (0.2); emails to J. Spreen (Baker) and M. Leonard (Baker) re: 10-K issues (0.1); call with M. Leonard (Baker), J. Spreen (Baker), and A. Ericksen (W&C) re: 10-K issues (0.5); call with S. Dwoskin (Brown Rudnick) re: 10-K issues (0.1); further research/analysis re: 10-K issues (1.3).	D Turetsky	3.70	7,030.00
26 February 2024	Discuss 10-K with D. Turetsky (0.6); analyze Exchange Act definitions (1.5); call with J. Spreen, M. Leonard and D. Turetsky re: 10-K (0.5).	A Ericksen	2.60	4,472.00
26 February 2024	Correspond with M. Patterson re: MORs.	D Kim	0.10	143.00
26 February 2024	Review 10-K excerpts re: provisions re: chapter 11 cases (0.3); draft correspondence to M. Leonard and A. Kroll re: same (0.2); calls with D. Turetsky re: 10-K (0.3); draft 10-K excerpt re: required Exchange Act disclosures (0.3); draft correspondence to D. Turetsky re: 10-K Plan disclosures (0.1); revise same (0.3); call	R Szuba	2.70	3,483.00

WHITE & CASE

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	with Silverman re: same (0.2); draft and review correspondence to D. Turetsky and W&C team re: same (0.3); draft correspondences to A. Kroll re: 10-K disclosures re: Plan and confirmation order (0.5); confer with D. Turetsky re: same (0.2).			
27 February 2024	Review and comment re: 10-K language (0.3); call with Brown Rudnick (J. Cushing, B. Silverberg, and S. Dwoskin), Baker Hostetler (J. Spreen, M. Leonard), W. Gallagher (M3) re: 10-K issues (0.5).	D Turetsky	0.80	1,520.00
27 February 2024	Draft disclosure insert for 10-K (0.6); email D. Turetsky and J. Zakia re: same (0.1); draft correspondence to J. Spreen and M. Leonard re: 10-K (0.1).	R Szuba	0.80	1,032.00
28 February 2024	Review final drafts of amended LEVC and LMC December MORs (0.1); review final drafts of Debtors' January MORs (0.1); correspond with A. Kroll re: same (0.1); correspond with M. Patterson (WBD) for filing of same (0.1).	D Kim	0.40	572.00
29 February 2024	Emails to D. Ninivaggi (Lordstown), M. Leonard (Baker Hostetler), J. Spreen (Baker Hostetler) and others re: OIP 8-K issues (0.2); call with J. Spreen (Baker) re: OIP 8-K issues (0.1); review and comment re: 8K re: OIP (0.6).	D Turetsky	0.90	1,710.00
SUBTOTAL: Reports, Schedules & U.S. Trustee Issues			31.80	52,990.00
TOTAL			522.10	858,338.00

Exhibit B

Expense Detail

Date	Name	Narrative	Category	Amount
2/13/2024	Turetsky, David	Everest Court Reporting LLC. Invoice Date: 15 August 2023. - CERTIFIED COPY OF TRANSCRIPT OF: Adam Kroll Case Name: In re Lordstown Motor Corp., et al. v. Atri Amin and Benjamin Hebert, et al.	Deposition Transcripts	\$4,193.42