

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Stage Stores, Inc., *et al.*Debtors.¹

Chapter 11

Case No. 20-32564 (DRJ)

(Jointly Administered)

**COVERSHEET TO FIRST INTERIM APPLICATION OF COLE SCHOTZ P.C.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS CO-
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM MAY 22, 2020 THROUGH JULY 31, 2020**

Name of Applicant:	Cole Schotz P.C.	
Applicant's Role in case:	Counsel to the Official Committee of Unsecured Creditors	
Date Order of Employment Signed:	July 2, 2020 (Docket No. 547)	
Time Period Covered in Application:	Beginning of Period	Ending of Period
	May 22, 2020	July 31, 2020
Time Period covered by any prior applications:	N/A	N/A
Total amounts awarded in all prior applications:	N/A	
Total fees requested in this Application:	\$422,292.00	
Total professional fees requested in this Application:	\$416,121.00	
Total actual professional hours covered by this Application:	664.6	
Average hourly rate for professionals:	\$563.64	
Total paraprofessional fees requested in this Application:	\$6,171.00	
Total actual paraprofessional hours covered by this Application:	21.6	
Average hourly rate for paraprofessionals:	\$296.00	
Reimbursable expenses sought in this application:	\$221.99	
Total to be Paid to Priority Unsecured Creditors:	N/A	
Anticipated % Dividend to Priority Unsecured Creditors:	N/A	
Total to be Paid to General Unsecured Creditors	N/A	

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900). The Debtors' service address is: 2425 West Loop South, Houston, Texas 77027.



Anticipated % Dividend to Unsecured Creditors:	N/A
Date of confirmation hearing:	August 14, 2020
Indicate whether the plan has been confirmed.	Yes

Date Signed: September 17, 2020

/s/ Michael D. Warner

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*Co-Counsel to the Official Committee of
Unsecured Creditors*

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ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM MAY 22, 2020 THROUGH JULY 31, 2020**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900). The Debtors' service address is: 2425 West Loop South, Houston, Texas 77027.

Cole Schotz P.C. (“Cole Schotz”) as co-counsel to the Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned cases (the “Chapter 11 Cases”) of Stage Stores, Inc. and the affiliated debtors and debtors in possession (collectively, the “Debtors”) hereby files its first application for allowance of compensation for services rendered and necessary expenses incurred for the period from May 22, 2020 through July 31, 2020 (the “First Interim Application Period”), pursuant to sections 330 and 331 of the United States Bankruptcy Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2016-1 and 9013-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 437] (the “Interim Compensation Order”). For the First Interim Application Period, Cole Schotz seeks interim allowance of \$422,292.00 as fees for services rendered and \$221.99 as reimbursement of expenses incurred. In support of this application (this “Application”), Cole Schotz submits the Declaration of Seth Van Aalten (the “Van Aalten Declaration”) attached hereto as **Exhibit 1** and a proposed order approving the Application attached hereto as **Exhibit 2**. In further support of this Application, Cole Schotz respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of Texas*, dated May 24, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2) and Article III of the United States Constitution. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330, 331 and 1103 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rules 2016-1 and 9013-1 of the Local Rules.

BACKGROUND

A. General Background

3. On May 10, 2020 (the “Petition Date”), each of the Debtors commenced a voluntary case under chapter 11 of the Bankruptcy Code in this Court. The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these Chapter 11 Cases.

4. On May 20, 2020, the Office of the United States Trustee for the Southern District of Texas (the “U.S. Trustee”) appointed the Committee pursuant to Section 1102 of the Bankruptcy Code. The Committee consists of the following seven (7) members: (i) Seven Apparel Group, Inc., (ii) Nike USA, Inc., (iii) Specialty Store Services, Inc., (iv) Adobe Systems, Inc., (v) Enchante Accessories, Inc., (vi) Sketchers USA Inc., and (vii) Regency Commercial Associates LLC.

B. The Committee’s Retention of Cole Schotz

5. On May 22, 2020, the Committee selected Cole Schotz and Cooley LLP (“Cooley”) to serve as co-counsel to the Committee, and Province, Inc. (“Province”) to serve as financial advisor to the Committee, subject to Court approval.

6. On July 2, 2020, the Court entered the *Order Approving Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment*

and Retention of Cole Schotz P.C., as Co-Counsel to the Committee Effective as of May 22, 2020 [Docket No. 547] (the “Retention Order”).

7. Among other things, the Retention Order authorizes the Debtors to compensate and reimburse Cole Schotz in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any orders entered in these cases. The Retention Order also authorizes the compensation of Cole Schotz at its standard hourly rates and the reimbursement of Cole Schotz’s actual and necessary out-of-pocket expenses incurred, subject to application to this Court.

C. Case Status

8. On the Petition Date, the Debtors initiated store closings at all of their retail locations. Concurrently, the Debtors continued their prepetition marketing efforts to explore going-concern transactions involving all or a subset of their stores. Although the Debtors received numerous indications of interest, ultimately, none of those efforts materialized into an actionable bid and the Debtors continued with the orderly liquidation of their assets. On August 14, 2020, the Court confirmed the *Joint Second Amended Chapter 11 Plan of Stage Stores, Inc. and Specialty Retailers, Inc.* (the “Plan”), which provides for the appointment of the Plan Administrator on the Plan effective date to, among other things, monetize remaining assets and make distributions as contemplated by the Plan. As of the date hereof, the Plan has not yet gone effective, and the Debtors continue to liquidate their remaining assets and wind-down their estates.

**SUMMARY OF PROFESSIONAL COMPENSATION AND REIMBURSEMENT
OF EXPENSES REQUESTED**

9. Cole Schotz seeks interim allowance of \$422,292.00 in fees calculated at the hourly billing rates of Cole Schotz’s professionals who worked on this case, and \$221.99 in expenses actually and necessarily incurred by Cole Schotz while providing services to the

Committee during the First Interim Application Period. During the First Interim Application Period, Cole Schotz attorneys and paraprofessionals expended a total of 686.2 hours for which compensation is requested.

10. Pursuant to the Interim Compensation Order, during these cases, Cole Schotz has filed monthly fee statements and has received payment of 80% of fees and 100% of expenses for services rendered and expenses incurred from May 22, 2020 through June 30, 2020. Cole Schotz has not yet received payment of 80% of fees and 100% of expenses for services rendered and expenses incurred from July 1 through July 31, 2020, as the objection deadline for that monthly fee statement has not yet expired.² As of the date of this Application, Cole Schotz has not received any objections to its monthly fee statements. A summary of the amounts paid to Cole Schotz in accordance with the Interim Compensation Order for monthly fee statements relating to the First Interim Application Period is set forth as follows:

Period	Fees Incurred	Fees Paid	Expenses Incurred	Expenses Paid	Balance (Fees & Expenses)
5/22/2020 – 6/30/2020 [Docket No. 612]	\$293,832.50	\$235,066.00	\$39.19	\$39.19	\$58,766.50
7/1/2020 – 7/31/2020 [Docket No. 722]	\$128,459.50	\$0	\$182.80	\$0	\$128,642.30
Balance Owning:	\$422,292.00	\$235,066.00	\$221.99	\$39.19	\$187,408.80

11. Pursuant to this Application, Cole Schotz now seeks payment of the twenty percent (20%) “hold-back” amounts in connection with its previously filed monthly fee statements, in addition to any other amounts owed that (i) are allowed under the Interim Compensation Order, and (ii) remain unpaid as of the date of any order approving this Application.

² The objection deadline for Cole Schotz’s second monthly fee statement covering the period of July 1 through July 31, 2020 is September 11, 2020.

12. The fees charged by Cole Schotz in these cases are billed in accordance with Cole Schotz's existing billing rates and procedures in effect during the First Interim Application Period. The rates Cole Schotz charges for the services rendered by its professionals and paraprofessionals in these chapter 11 cases generally are the same rates Cole Schotz charges for professional and paraprofessional services rendered in comparable bankruptcy and non-bankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable bankruptcy and non-bankruptcy cases in a competitive national legal market.

13. Attached hereto as **Exhibit 3** is a summary breakdown of hours and amounts billed by timekeeper. The summary sheet lists those Cole Schotz professionals, and paraprofessionals who have performed services for the Committee during the First Interim Application Period, the capacities in which each individual is employed by Cole Schotz, the department in which each individual practices, the hourly billing rate charged by Cole Schotz for services performed by such individual, the year in which each attorney was first licensed to practice law, where applicable, and the aggregate number of hours expended in this matter and fees billed therefor.

14. Attached hereto as **Exhibit 4** is a summary break down of hours and amounts billed by project category.

15. Cole Schotz maintains computerized records of the time spent by all Cole Schotz attorneys and paraprofessionals in connection with these chapter 11 cases. Copies of these computerized records were filed and served with Cole Schotz's monthly fee statements in the format and by the procedure specified by the Interim Compensation Order. Copies of the monthly fee statements together with the time records are attached hereto as **Exhibit 5**.

16. Cole Schotz reserves the right to request additional compensation for the First Interim Application Period to the extent that it is later determined that time or disbursement charges for services rendered or disbursements incurred during such time period have not yet been submitted.

SUMMARY OF SERVICES RENDERED

17. The following narrative provides a brief summary of the services rendered by Cole Schotz on behalf of the Committee organized by project category. The summary that follows is not intended to be a detailed description of the work performed by Cole Schotz during the First Interim Application Period, as those day-to-day services and the time expended in performing such services are fully set forth in the contemporaneous time records that are attached in **Exhibit 5**. Rather, the following summary attempts to highlight certain of those areas in which services were entered to the Committee.

A. Asset Disposition

Fees: \$11,445.00 Total Hours: 15.0

18. This category includes time spent (i) reviewing the indications of interest submitted by potential purchasers, (ii) reviewing the sale notice and other documents related to the sale process, and (iii) communicating with Cooley, Province, and the Debtors' professionals regarding the sale process.

B. Asset Acquisitions/Business Combinations

Fees: \$1,200.00 Total Hours: 1.5

19. This category includes time spent in connection with, among other things, the termination of the Debtors' NetJets contract.

C. Assumption and Rejection of Leases and Contracts

Fees: \$910.00 Total Hours: 1.4

20. This category includes time spent communicating with parties-in-interest regarding the Debtors' section 365(d)(3) extension motion.

D. Bank Claims/Litigation

Fees: \$1,360.00 Total Hours: 1.7

21. This category includes time spent reviewing loan documents in connection with the Committee's investigation of potential claims against the Prepetition Lenders.

E. Business Operations

Fees: \$910.00 Total Hours: 1.4

22. This category includes time spent reviewing the cash management motion and information provided by the Debtors' professionals regarding the company's business operations.

F. Case Administration

Fees: \$22,629.00 Total Hours: 48.1

23. This category includes work performed in connection with the day-to-day management of the Chapter 11 Cases including, but not limited to, (i) reviewing and monitoring the case docket and certain generic filings in these Chapter 11 Cases, (ii) maintaining a case calendar of upcoming events, hearings, and deadlines, (iii) conferring with the Debtors and the Committee's other professionals regarding, among other things, the case status and sale process, (iv) preparing and filing a notice of appearance and *pro hac vice* applications, (v) preparing and maintaining the Committee distribution lists, and (vi) coordinating with Cooley and the

Committee regarding the division of labor between the Committee professionals in these Chapter 11 Cases.

G. Claims Administration and Objections

Fees: \$5,352.50 Total Hours: 7.1

24. This category includes time spent (i) reviewing the Debtors' motion to pay certain prepetition claims and the order approving same, (ii) reviewing the bar date motion, order, and notice, and (iii) corresponding with counsel for the wage and hour class action claims.

H. Corporate Governance and Board Matters

Fees: \$687.50 Total Hours: 1.1

25. This category includes time spent analyzing the insurance motion, the NOL motion, and the related proposed orders.

I. Employee Matters

Fees: \$3,495.50 Total Hours: 4.9

26. This category includes time spent reviewing and analyzing the employee wage motion, the KEIP/KERP motion, and the related proposed orders.

J. Retention Matters

Fees: \$35,067.50 Total Hours: 51.6

27. This category includes time spent (i) preparing, reviewing, and filing Cole Schotz's retention application, (ii) reviewing, revising, and filing the retention applications of Province and Cooley, and (iii) reviewing, analyzing, and commenting on the retention applications filed by the Debtors' professionals.

K. Fee Applications/Objections

Fees: \$9,337.50 Total Hours: 14.8

28. This category includes time spent (i) preparing and filing Cole Schotz's monthly fee statements, (ii) reviewing, revising, and filing the monthly fee statements of Cooley and Province, and (iii) reviewing the monthly fee statements filed by the Debtors' professionals.

L. Financing and Cash Collateral

Fees: \$148,146.50 Total Hours: 217.6

29. This category includes time spent with respect to the Debtors' use of cash collateral in these Chapter 11 Cases. During the First Interim Application Period, Cole Schotz spent substantial time, among other things, (i) reviewing and analyzing the cash collateral motion, related budget, and the order approving same, (ii) conferring with Province regarding the budget and issues with respect thereto, (iii) drafting an objection to the Debtors' cash collateral motion and a related supporting declaration, (iv) negotiating with the Debtors and the Prepetition Lenders regarding a consensual resolution of the Committee's claims, (v) preparing for a contested cash collateral hearing, and (vi) conferring with the Committee and other parties-in-interest regarding same.

M. General

Fees: \$3,248.00 Total Hours: 4.1

30. This category includes time spent communicating with Committee members, reviewing various first day pleadings and other generic filings, and attending to other tasks that did not properly fit into any other task category.

N. Investigative Matters

Fees: \$19,655.00 Total Hours: 47.2

31. This category primarily includes time spent investigating the extent, validity, priority, and perfection of the Prepetition Lenders' liens.

O. Leases (Real Property)

Fees: \$3,036.00 Total Hours: 4.8

32. This category includes time spent (i) responding to landlord inquiries, (ii) reviewing the lease rejection notices, and (iii) reviewing the store closing motion and related order.

P. Creditor Inquiries

Fees: \$5,123.50 Total Hours: 7.2

33. This category includes time spent responding to creditor inquiries regarding, among other things, the sale process, the store closing sales, the disclosure statement and Plan, and the general case status.

Q. Litigation

Fees: \$94,043.50 Total Hours: 176.5

34. This category includes time spent (i) corresponding with Cooley, Province, and the Debtors regarding the Committee's claims investigation, (ii) investigating the extent, validity, and perfection of the Prepetition Lenders' liens, (iii) researching and analyzing potential claims against the Prepetition Lenders and drafting a memorandum to the Committee regarding same, and (iv) attending to various other litigation matters.

R. Meetings and Communications with Creditors

Fees: \$18,471.00 Total Hours: 26.7

35. This category includes time spent (i) preparing for and participating in weekly meetings and communications with the Committee, including its individual members and other professionals, (ii) preparing updates to the Committee, (iii) reviewing and commenting on the non-disclosure agreement with the Debtors, and (iv) preparing the Committee bylaws.

S. Reorganization Plan

Fees: \$18,182.50 Total Hours: 24.0

36. This category includes time spent (i) reviewing, analyzing, and commenting on the Plan and disclosure statement, and (ii) conferring with the Committee, the Debtors, and other parties-in-interest regarding same.

T. Preferences and Avoidance Actions

Fees: \$800.00 Total Hours: 1.0

37. This category includes time spent conferring with Cooley and Province regarding potential preference actions.

U. Reports; Statements and Schedules

Fees: \$320.00 Total Hours: 0.4

38. This category includes time spent reviewing the memorandum regarding the Debtors' statements of financial affairs and schedules of assets of liabilities that was prepared by Province.

V. Disclosure Statement/Voting Issues

Fees: \$3,110.00 Total Hours: 4.5

39. This category includes time spent (i) reviewing and commenting on the Committee's statement filed in response to the disclosure statement that was prepared by Cooley, (ii) analyzing the revised disclosure statement.

W. Preparation and Hearings Attendance

Fees: \$15,761.50 Total Hours: 23.6

40. This category includes time spent preparing for and attending hearings held in these Chapter 11 Cases.

SUMMARY OF ACTUAL AND NECESSARY EXPENSES

41. During the First Interim Application Period, Cole Schotz incurred \$221.99 in expenses on behalf of the Committee. It is Cole Schotz's policy to charge its clients in all areas of practice for out-of-pocket expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, court fees, conference calls, deposition transcripts, Investigators, lien/litigation work, outside printing, and photocopying. Cole Schotz charges for these expenses in a manner and at rates consistent with charges made generally to its other clients. A summary of Cole Schotz's expenses incurred during the First Interim Application Period is provided in Exhibit 6.

BASIS FOR THE RELIEF REQUESTED

42. Section 331 of the Bankruptcy Code provides for interim compensation of professionals not more than once every 120 days after the commencement of the cases (or more often as the court may permit) and incorporates the substantive standards of section 330 to govern the Court's award of such compensation. *See* 11 U.S.C. § 331. Section 330 provides that

a Court may award a professional employed under section 327 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered [and] reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1).

43. Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded to . . . [a] professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- A. the time spent on such services;
- B. the rates charged for such services;
- C. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- D. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- E. with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- F. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

44. In determining the reasonableness of fees, courts routinely employ the twelve factors set forth by the Fifth Circuit in *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974). These factors include: (1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by client or the

circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation and ability of the attorneys; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. *Id.* at 123 n.8. In *In re First Colonial Corp. of America*, 544 F.2d 1291, 1298-99 (5th Cir. 1977), *cert. denied*, 431 U.S. 904 (1977), the Fifth Circuit applied the *Johnson* factors to the analysis of fee awards in bankruptcy cases.

45. Under an analysis utilizing the *Johnson* factors and the standards customarily applied to fee awards under sections 330 and 331 of the Bankruptcy Code, Cole Schotz submits that its request for compensation and reimbursement of expenses is reasonable and proper, and that such request should be allowed in the requested amount. Cole Schotz devoted a substantial amount of time and effort addressing the numerous issues involved in these Chapter 11 Cases. Whenever possible, Cole Schotz sought to minimize the costs of its services to the Committee by utilizing junior attorneys and paraprofessionals to handle the more routine aspects of case administration.

46. Cole Schotz respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, believed to be necessary to effectively represent the Committee and the interests of the Debtors' estates and creditors, were performed economically, effectively and efficiently.

47. Further, Cole Schotz submits that consideration of the relevant *Johnson* factors establishes that the compensation requested is reasonable in light of the nature, extent, and value of such services to the Debtors, their estates, and all parties-in-interest:

- (a) *The Time and Labor Required.* The professional services rendered by Cole Schotz on behalf of the Committee have required the expenditure of substantial time and effort, as well as a high degree of professional competence and expertise, in order to deal with the many issues encountered with skill and

dispatch. Cole Schotz respectfully represents that the services rendered by it were performed efficiently, effectively, and economically.

- (b) *The Novelty and Difficulty of Questions.* Although the issues in this case were not particularly novel, many legal challenges have arisen in the course of these cases. Cole Schotz's effective assistance has and will continue to maximize value for the benefit of the estate and its stakeholders and facilitate resolutions of such challenges.
- (c) *The Skill Required to Perform the Legal Services Properly.* Cole Schotz believes that its recognized expertise in the area of insolvency proceedings and reorganization have contributed to the efficient and effective administration of these Chapter 11 Cases.
- (d) *The Preclusion of Other Employment by Applicant Due to Acceptance of the Case.* Cole Schotz's representation of the Committee has not precluded its acceptance of new clients. However, Cole Schotz dedicated substantial time to these Chapter 11 Cases, particularly with respect to the terms of the Debtors' use of cash collateral and the Committee's investigation of potential claims against the Prepetition Lenders.
- (e) *The Customary Fee.* The fees sought herein are based upon Cole Schotz's normal hourly rates for services of this kind. Cole Schotz respectfully submits that the hourly rates of its professionals are not unusual given the time expended in attending to the representation of the Committee. Cole Schotz's hourly rates and the fees requested herein are commensurate with fees Cole Schotz has been awarded in other Chapter 11 cases, as well as with fees charged by other attorneys of comparable experience.
- (f) *Whether the Fee is Fixed or Contingent.* The fees requested in this Application represent fees incurred based upon a fixed hourly rate basis, contingent upon the Court's approval of this Application.
- (g) *Time Limitations Imposed by Client or other Circumstances.* Cole Schotz provided capable legal representation within the time limitations imposed under the unique circumstances of these cases. During these Chapter 11 Cases, there were numerous instances in which it was necessary for Cole Schotz to deliver services on very short notice and under significant time constraints.
- (h) *The Amount Involved and Results Obtained.* For the reasons described above, Cole Schotz respectfully submits that the amount of fees for which compensation is sought is reasonable under the circumstances given the numerous matters that had to be addressed.
- (i) *The Experience, Reputation and Ability of the Attorneys.* Cole Schotz is a professional association whose attorneys practice extensively in the fields of bankruptcy and corporate restructuring; litigation; real estate; tax, trusts and estates; corporate, finance and business transactions; employment; environmental;

construction services and other phases of the law. Cole Schotz has represented debtor, creditors, creditors' committees, fiduciaries and numerous other parties in cases before the Bankruptcy Courts for the Southern District of Texas as well as in various other Bankruptcy Courts throughout the country.

- (j) The Undesirability of the Case. Not applicable.
- (k) Nature and Length of Professional Relationship. Not applicable.
- (l) Awards In Similar Cases. As previously indicated, the fees sought herein are commensurate with fees Cole Schotz has been awarded in other chapter 11 cases.

48. In addition, consistent with Section 331 of the Bankruptcy Code, this is Cole Schotz's first and only interim fee application during the first 120 days since the Petition Date. See 11 U.S.C. § 331.

49. In sum, the services rendered by Cole Schotz were necessary and beneficial to the Committee and were consistently performed in a timely manner commensurate with the complexity, importance, and nature of the issues involved. Accordingly, approval of the compensation for professional services and reimbursement of the expenses sought herein is warranted.

50. No previous application for the relief sought herein has been made to this or any other Court.

WHEREFORE, Cole Schotz respectfully requests that the Court (i) approve the allowance of \$422,292.00 for compensation for professional services rendered to the Committee by Cole Schotz during the First Interim Application Period, (ii) approve the reimbursement of \$221.99 for Cole Schotz's out-of-pocket expenses incurred in connection with the rendering of such services during the First Interim Application Period, (iii) authorize and direct the Debtors to immediately pay to Cole Schotz the unpaid portion of such allowed fees and expenses, and (iv) award such other relief as the Court deems just and proper.

Respectfully submitted,

Dated: September 17, 2020

/s/ Michael D. Warner

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- and -

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*Co-Counsel to the Official Committee of
Unsecured Creditors*

EXHIBIT 1

Van Aalten Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Stage Stores, Inc., *et al.*

Debtors.¹

Chapter 11

Case No. 20-32564 (DRJ)

(Jointly Administered)

**DECLARATION OF SETH VAN AALTEN IN SUPPORT OF THE
FIRST INTERIM APPLICATION OF COLE SCHOTZ P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM MAY 22, 2020 THROUGH JULY 31, 2020**

I, Seth Van Aalten, declare under penalty of perjury:

1. I am a partner in the Bankruptcy and Corporate Restructuring Group at Cole Schotz P.C. ("Cole Schotz"), a law firm which employs approximately 140 attorneys and maintains an office for the practice of law at 1325 Avenue of the Americas, Suite 1900, New York, New York 10019. I am the attorney from Cole Schotz with responsibility for this engagement.

2. I have read the *First Interim Application of Cole Schotz P.C., for Allowance of Compensation for Services Rendered as Counsel to the Official Committee of Unsecured Creditors for the Period from May 22, 2020 through July 31, 2020* (the "Application") filed contemporaneously herewith.² To the best of my knowledge, information, and belief, formed after reasonable inquiry, the statements contained in the Application are true and correct. In

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900). The Debtors' service address is: 2425 West Loop South, Houston, Texas 77027.

² Capitalized terms used but not defined herein shall have the meanings assigned to them in the Application.

addition, I believe that the Application conforms with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, this Court's orders, and the U.S. Trustee Guidelines.

3. In connection therewith, I hereby certify that:
 - a. The fees and disbursements sought in the Application are billed at rates customarily employed by Cole Schotz and generally accepted by Cole Schotz's clients. In addition, none of the professionals seeking compensation varied their hourly rates based on the geographic location of the Debtors' cases;
 - b. In providing a reimbursable expense, Cole Schotz does not make a profit on that expense, whether the service is performed by Cole Schotz in-house or through a third party;
 - c. In accordance with Bankruptcy Rule 2016(a) and Bankruptcy Code Section 504, no agreement or understanding exists between Cole Schotz and any other person for the sharing of compensation to be received in connection with these Chapter 11 Cases except as authorized pursuant to the Bankruptcy Code, Bankruptcy Rules and Local Rules; and
 - d. All services for which compensation is sought were professional services on behalf of the Committee and not on behalf of any other person.

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

Executed on September 17, 2020

By: /s/ Seth Van Aalten
Seth Van Aalten

EXHIBIT 2

PROPOSED ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Stage Stores, Inc., *et al.*

Debtors.¹

Chapter 11

Case No. 20-32564 (DRJ)

(Jointly Administered)

**ORDER GRANTING FIRST INTERIM APPLICATION OF COLE SCHOTZ
P.C. FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AS COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR THE PERIOD FROM
MAY 22, 2020 THROUGH JULY 31, 2020
(Related Docket No. _____)**

Upon consideration of the *First Interim Application of Cole Schotz P.C., for Allowance of Compensation for Services Rendered as Counsel to the Official Committee of Unsecured Creditors for the Period from May 22, 2020 Through July 31, 2020* (the “Application”)² filed by Cole Schotz P.C. (“Cole Schotz”); and this Court having jurisdiction over the Application; and due and adequate notice of the Application and the relief requested therein having been given under the circumstances and no other or further notice being required; and the Court having read and considered the Application, objections to Application, if any, and arguments of counsel, if any; and any objections to the Application having been resolved or overruled; and for good cause shown;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900). The Debtors’ service address is: 2425 West Loop South, Houston, Texas 77027.

² Capitalized terms used but not defined herein shall have the meanings assigned to them in the Application.

IT IS HEREBY ORDERED THAT:

1. The relief requested in the Application is hereby GRANTED as provided herein.

2. Cole Schotz is hereby awarded, on an interim basis, the allowance of \$422,292.00 for compensation for professional services and \$221.99 for reimbursement of expenses for the period of May 22, 2020 through July 31, 2020.

3. The Debtors are hereby authorized and directed to immediately pay Cole Schotz the unpaid portion of such allowed fees and expenses.

Dated: _____, 2020

THE HONORABLE DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 3**SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FEE APPLICATION**

NAME	TITLE OR POSITION	DEPARTMENT GROUP, OR SECTION	DATE OF FIRST ADMISSION	HOURS BILLED IN THIS APPLICATION	HOURLY RATE BILLED IN THIS APPLICATION	FEES BILLED IN THIS APPLICATION
Michael D. Warner	Member	Bankruptcy & Restructuring	1984	28.0	\$840	\$23,520.00
Seth Van Aalten	Member	Bankruptcy & Restructuring	2004	143.70	\$800	\$114,960.00
Justin R. Alberto	Member	Bankruptcy & Restructuring	2008	16.60	\$625	\$10,375.00
Irving E. Walker	Member	Bankruptcy & Restructuring	1978	20.60	\$675	\$13,905.00
Roger M. Iorio	Member	Corporate	2002	31.40	\$670	\$21,038.00
G. David Dean	Member	Bankruptcy & Restructuring	2002	124.30	\$600	\$74,580.00
Sarah A. Carnes	Associate	Bankruptcy & Restructuring	2015	190.00	\$650	\$123,500.00
Benjamin L. Wallen	Associate	Bankruptcy & Restructuring	2016	2.80	\$350	\$980.00
Adam Garrastegui	Associate	Bankruptcy & Restructuring	2019	78.20	\$290	\$22,678.00
H.C. Jones	Associate	Bankruptcy & Restructuring	2016	23.20	\$375	\$8,700.00
Shelby K. Nace	Associate	Bankruptcy & Restructuring	2019	5.80	\$325	\$1,885.00
Kerri L. LaBrada	Paralegal	Bankruptcy & Restructuring	n/a	8.40	\$265	\$2,226.00
Frances Pisano	Paralegal	Bankruptcy & Restructuring	n/a	1.90	\$305	\$579.50
Kim McEllen	Paralegal	Corporate	n/a	5.60	\$290	\$1,624.00
Roseanne Cohen	Paralegal	Bankruptcy & Restructuring	n/a	.60	\$310	\$186.00
Suhailah S. Sallie	Paralegal	Bankruptcy & Restructuring	n/a	5.10	\$305	\$1,555.50
			Total:	686.20		\$422,292.00

EXHIBIT 4**TASK CODE SUMMARY FROM
MAY 22, 2020 THROUGH JULY 31, 2020**

Task Code	Billed Hours	Billed Amount
Asset Disposition	15.00	\$11,445.00
Asset Acquisitions/Business Combinations	1.50	\$1,200.00
Assumption and Rejection of Leases and Contracts	1.40	\$910.00
Bank Claims/Litigation	1.70	\$1,360.00
Business Operations	1.40	\$910.00
Case Administration	48.10	\$22,629.00
Claims Administration and Objections	7.10	\$5,352.50
Corporate Governance and Broad Matters	1.10	\$687.50
Employee Matters	4.90	\$3,495.50
Fee Applications/Objections	14.80	\$9,337.50
Financing and Cash Collateral	217.60	\$148,146.50
General	4.10	\$3,248.00
Investigative Matters	47.20	\$19,655.00
Leases (Real Property)	4.80	\$3,036.00
Litigation	176.50	\$94,043.50
Creditor Inquires	7.20	\$5,123.50
Meetings and Communications with Creditors	26.70	\$18,471.00
Reorganization Plan	24.00	\$18,182.50
Preferences and Avoidance Actions	1.0	\$800.00
Reports; Statements and Schedules	.40	\$320.00
Disclosure Statement/Voting Issues	4.50	\$3,110.00
Preparation and Hearings Attendance	23.60	\$15,761.50
Retention Matters	51.6	\$35,067.50
TOTAL:	686.20	\$422,292.00

Exhibit 5

MONTHLY FEE STATEMENTS

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:)	
)	Chapter 11
Stage Stores, Inc., <i>et al.</i>)	
)	Case No. 20-32564 (DRJ)
)	
Debtors. ¹)	(Jointly Administered)

MONTHLY FEE STATEMENT OF COLE SCHOTZ P.C. FOR
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF
EXPENSES AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR THE PERIOD FROM
MAY 22, 2020 THROUGH JUNE 30, 2020

Pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* entered by the Court on June 10, 2020 (the “Interim Compensation Order”) [Docket No. 437], Cole Schotz P.C. (“Cole Schotz”), co-counsel for the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), submits this monthly statement (this “Statement”) of services rendered and expenses incurred in these cases for the period from May 22, 2020 through June 30, 2020 (the “Statement Period”).

I. Itemization of Services Rendered by Cole Schotz

A. The following is a list of individuals and their respective titles that provided services during the Statement Period. It includes information regarding their respective billing rates and the total number of hours spent by each individual providing services during the Statement Period for which Cole Schotz seeks compensation.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900). The Debtors’ service address is: 2425 West Loop South, Houston, Texas 77027.



SUMMARY

Name	Position / Dept.	State of Bar Admission / Year	Hours	Hourly Rate²	Total Compensation
Michael D. Warner	Member/ Bankruptcy & Restructuring	California, 1984	23.50	\$840	\$19,740.00
Seth Van Aalten	Member/ Bankruptcy & Restructuring	New York, 2004	111.00	\$800	\$88,800.00
Justin R. Alberto	Member/ Bankruptcy & Restructuring	Delaware, 2008	16.60	\$625	\$10,375.00
Irving E. Walker	Member/ Bankruptcy & Restructuring	Maryland, 1978	3.70	\$675	\$2,497.50
Roger M. Iorio	Member/ Corporate	New Jersey, 2002	3.90	\$670	\$2,613.00
G. David Dean	Member/ Bankruptcy & Restructuring	Delaware 2017, D.C. 2003, Maryland, 2002	72.80	\$600	\$43,680.00
Sarah A. Carnes	Associate/ Bankruptcy & Restructuring	New York, 2015	166.70	\$650	\$108,355.00
Benjamin L. Wallen	Associate/ Bankruptcy & Restructuring	Texas, 2016	2.60	\$350	\$910.00
Adam Garrastegui	Associate/ Bankruptcy & Restructuring	New Jersey, 2019	36.00	\$290	\$10,440.00
Shelby K. Nace	Associate/ Bankruptcy & Restructuring	New York, 2019	3.70	\$325	\$1,202.50
Kerri L. LaBrada	Paralegal	n/a	6.30	\$265	\$1,669.50
Frances Pisano	Paralegal	n/a	1.50	\$305	\$457.50
Kim McEllen	Paralegal	n/a	5.30	\$290	\$1,537.00
Suhailah S. Sallie	Paralegal	n/a	5.10	\$305	\$1,555.50
Total			458.70		\$293,832.50

² This rate is Cole Schotz's regular hourly rate for legal services. All hourly rates are adjusted by Cole Schotz on a periodic basis. The last adjustment occurred on October 1, 2019.

B. The time records of Cole Schotz consisting of a daily breakdown of the time spent by each person on each day, and detail as to the disbursements incurred are attached as **Exhibit A** to this Statement.

II. Itemization of Services Rendered and Disbursements Incurred by Category

The following itemization presents the services rendered by Cole Schotz by task category and provides a summary of disbursements incurred by category of disbursement.

1. Services Rendered

The following services were rendered in the following task category:

Task Category	Hours	Fees Earned
Asset Disposition	8.50	\$6,395.00
Assumption and Rejection of Leases and Contracts	1.40	\$910.00
Bank Claims/Litigation	1.70	\$1,360.00
Business Operations	.90	\$585.00
Case Administration	42.30	\$20,203.50
Claims Administration and Objections	4.20	\$3,092.50
Corporate Governance and Board Matters	1.10	\$687.50
Employee Matters	4.90	\$3,495.50
Employment and Fee Applications	49.70	\$33,802.50
Fee Applications/Objections	.30	\$240.00
Financing and Cash Collateral	216.50	\$147,266.50
General	4.10	\$3,248.00
Investigative Matters	47.20	\$19,655.00
Leases (Real Property)	3.70	\$2,435.00
Litigation	2.40	\$1,635.00
Creditors Inquires	3.50	\$2,471.50
Meetings and Communications with Creditors	24.50	\$16,981.00
Reorganization Plan	15.60	\$11,867.50
Disclosure Statement/Voting Issues	3.90	\$2,720.00
Preparation and Hearings Attendance	22.30	\$14,781.50
TOTAL	458.70	\$293,832.50

A detailed itemization of the services rendered in each of the above task categories is set forth in **Exhibit A**.

2. Disbursements Incurred

The disbursements incurred by Cole Schotz for this Statement are as follows:

Expense Category	Total Expenses
Conference Call	\$30.89
Photocopy	\$5.60
Online Research	\$2.70
Total	\$39.19

3. Total Amount Payable

Accordingly, the amount of compensation and expenses payable for this Statement Period is **\$235,105.19**, which is calculated as follows:

Total Fees for Services Rendered During Statement Period	\$293,832.50
Twenty Percent (20%) Holdback	-\$58,766.50
Fees Minus Holdback	\$235,066.00
Costs (100%)	\$39.19
TOTAL	\$235,105.19

[Remainder of Page Intentionally Left Blank]

WHEREFORE, pursuant to the Interim Compensation Order, Cole Schotz requests payment of (i) compensation in the amount of \$235,066.00 (80% of \$293,832.50) on account of actual, reasonable and necessary professional services rendered to the Committee by Cole Schotz and (ii) reimbursement of actual and necessary costs and expenses in the amount of \$39.19 incurred on behalf of the Committee by Cole Schotz.

Dated: July 21, 2020

Respectfully submitted,

/s/ Michael D. Warner

Michael D. Warner (TX Bar No. 00792304)

COLE SCHOTZ P.C.

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- and -

Seth Van Aalten, Esq. (admitted *pro hac vice*)

Justin R. Alberto, Esq. (admitted *pro hac vice*)

Sarah A. Carnes, Esq. (admitted *pro hac vice*)

COLE SCHOTZ P.C.

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jalberto@coleschotz.com

scarnes@coleschotz.com

EXHIBIT A

Cole Schotz P.C.

Cole Schotz P.C.
1325 Avenue of the Americas
19th Floor
New York, NY 10019

FEDERAL ID# 22-2113414

New Jersey — Delaware — Maryland — Texas — Florida

OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF STAGE STORES, INC.
ET AL.
NIKE USA, INC.
NOEL RUNGE, DIRECTOR OF CREDIT & RISK
ONE BOWERMAN DRIVE
BEAVERTON, OH 97005

Invoice Date: July 13, 2020
Invoice Number: 866593
Matter Number: 61201-0001

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS

FOR PROFESSIONAL SERVICES THROUGH JUNE 30, 2020

CASH COLLATERAL AND DIP FINANCING			216.50		147,266.50
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/22/20	SVA	REVIEWED CASH COLLATERAL AND OTHER FIRST DAY PLEADINGS	3.60	800.00	2,880.00
05/23/20	SVA	REVIEW/COMMENT ON PROVINCE INITIAL DILIGENCE LIST	0.60	800.00	480.00
05/23/20	SVA	CONTINUED REVIEW OF FIRST DAY FILINGS	2.80	800.00	2,240.00
05/23/20	SVA	REVIEW/COMMENT ON PROPOSED BYLAWS	0.40	800.00	320.00
05/23/20	JRA	ANALYZE CASH MANAGEMENT MOTION AND PROPOSED FINAL ORDER	0.60	625.00	375.00
05/24/20	SVA	REVIEWED CREDITOR RELIEF FROM STAY MOTIONS AND OBJECTIONS TO CASH COLLATERAL	0.40	800.00	320.00
05/24/20	JRA	KICKOFF T/C WITH J. ALTMAN, S. VAN AALTEN, S. COLUMBE AND P. HUYGENS RE LEASES, INVENTORY AND GENERAL CASE ISSUES	0.80	625.00	500.00
05/24/20	JRA	BEGIN ANALYZING CASH COLLATERAL MOTION AND ISSUES POINTS (1.2); EMAILS WITH S. VAN AALTEN RE SAME (.2)	1.40	625.00	875.00
05/25/20	SVA	REVIEW/COMMENT ON DIP ISSUES LIST	0.60	800.00	480.00
05/25/20	JRA	EMAILS WITH S. VAN AALTEN RE CASH COLLATERAL	0.20	625.00	125.00
05/26/20	MDW	REVIEW LEAD COUNSEL'S PUNCH LIST RE CASH COLLATERAL ISSUES TO RAISE WITH THE DEBTORS.	0.30	840.00	252.00
05/27/20	SVA	T/C W/ PROVINCE RE CASH COLLATERAL MOTION	0.80	800.00	640.00
05/27/20	SVA	T/C W/ CARNES RE CASH COLLATERAL OBJECTION	0.40	800.00	320.00

COLE SCHOTZ P.C.

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS
Client/Matter No. 61201-0001

Invoice Number 866593
July 13, 2020
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/27/20	SVA	REVIEWD CASH COLLATERAL MOTION AND BUDGET FOR OBJECTION	1.40	800.00	1,120.00
05/27/20	SVA	REVIEWED BUDGET MATERIALS FROM PROVINCE	0.70	800.00	560.00
05/27/20	SYC	REVIEW PROVINCE DEC RE: CASH COLLATERAL (.3); CALL RE: SAME (.8); FOLLOW UP CALL WITH SVA (.3) AND EMAIL TO TEAM RE: SAME (.2)	1.60	650.00	1,040.00
05/27/20	SYC	REVIEW PRELIMINARY CASH COLLATERAL ISSUES LIST AND CALLS TO E. LAZEROWITZ RE: SAME	0.70	650.00	455.00
05/27/20	SYC	PRELIMINARY REVIEW OF LOAN DOCUMENTS	1.80	650.00	1,170.00
05/27/20	SYC	REVIEW OF CASH COLLATERAL FILINGS AND EMAILS TO DEBTORS RE: SAME	2.90	650.00	1,885.00
05/27/20	SYC	REVIEW OF DOCUMENTS IN DATA ROOM	1.40	650.00	910.00
05/28/20	SYC	BEGIN TO DRAFT CASH COLLATERAL OBJECTION	4.10	650.00	2,665.00
05/28/20	MDW	REVIEW EMAIL RE DIP ISSUES, AND PARTICIPATE IN ALL HANDS CALL RE SAME.	0.80	840.00	672.00
05/28/20	SYC	EMAILS AND CALLS WITH PROVINCE ON DATA FOR CASH COLLATERAL OBJECTION	1.50	650.00	975.00
05/28/20	SVA	CASH COLLATERAL OBJECTION PREPARATION	1.80	800.00	1,440.00
05/28/20	SVA	T/C W/ UCC PROFESSIONALS RE CASH COLLATERAL OBJECTION AND CASE STRATEGY	0.70	800.00	560.00
05/28/20	SYC	RESEARCH RE: CASH COLLATERAL OBJECTION AND AVOIDANCE ACTIONS	1.70	650.00	1,105.00
05/28/20	SYC	CONTINUED REVIEW OF PREPETITION LOAN DOCUMENTS AND DOCUMENTS IN DATA ROOM	1.90	650.00	1,235.00
05/29/20	SYC	REVIEW OF LONG TERM BUDGET AND EMAILS RE: PROVINCE DECLARATION	1.40	650.00	910.00
05/29/20	SYC	CONTINUE TO DRAFT CASH COLLATERAL OBJECTION	5.80	650.00	3,770.00
05/29/20	SVA	RVIEWED LENDER FEE LETTERS	0.70	800.00	560.00
05/29/20	SYC	CALLS AND EMAILS WITH PROVINCE RE: CASH COLLATERAL	1.60	650.00	1,040.00
05/29/20	SYC	RESEARCH RE: CASH COLLATERAL OBJECTION	2.10	650.00	1,365.00
05/30/20	SVA	REVIEW/REVISION OF CASH COLLATERAL OBJECTION	1.70	800.00	1,360.00
05/30/20	MDW	REVIEW CO-COUNSELS ISSUES RE CASH COLLATERAL OBJECTION - SD TX ISSUES.	0.60	840.00	504.00
05/30/20	SVA	CORRES W/ J. INDYKE RE 6.1 UCC CALL AND CASH COLLATERAL OBJECTION	0.40	800.00	320.00
05/30/20	GDD	REVIEW/ANALYSIS OF CASH COLLATERAL MOTION AND ORDER	1.60	600.00	960.00

COLE SCHOTZ P.C.

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS
Client/Matter No. 61201-0001

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July 13, 2020
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/30/20	SVA	CORRES W/ CARNES AND DEAN RE CASH COLLATERAL OBJECTION	0.80	800.00	640.00
05/30/20	GDD	PRELIMINARY REVIEW/COMMENTS TO INITIAL DRAFT OF CASH COLLATERAL OBJECTION	1.40	600.00	840.00
05/30/20	SYC	CONTINUE TO DRAFT CASH COLLATERAL OBJECTION (5.9); EMAILS RE: SAME (1.1); REVISE ACCORDING TO COMMENTS FROM SVA (.7)	7.70	650.00	5,005.00
05/30/20	SVA	CORRES W/ NIKE RE CASH COLLATERAL OBJECTION	0.60	800.00	480.00
05/31/20	GDD	CALL WITH S. VAN AALTEN RE: CASH COLLATERAL OBJECTION AND REALTED ISSUES	0.30	600.00	180.00
05/31/20	GDD	RESEARCH RE: CASH COLLATERAL OBJECTION ISSUES	1.80	600.00	1,080.00
05/31/20	GDD	CALL WITH S. VAN AALTEN (PARTIAL), S. CARNES, AND M. WARNER RE: CASH COLLATERAL OBJECTION AND LITIGATION STRATEGY	1.20	600.00	720.00
05/31/20	SVA	FURTHER REVIEW/COMMENT ON REVISED CASH COLLATERAL OBJECTION	1.20	800.00	960.00
05/31/20	SYC	EMAIL TO COOLEY RE: CASH COLLATERAL OBJECTION AND UPCOMING UCC CAL	0.50	650.00	325.00
05/31/20	SYC	CALLS AND EMAILS RE: LIT STRATEGY	1.20	650.00	780.00
05/31/20	SVA	TC W/ WARNER, DEAN AND CARNES RE CASH COLLATERAL OBJECTION	0.80	800.00	640.00
05/31/20	MDW	REVIEW DRAFT CASH COLLATERAL OBJECTIONS AND ADDRESS CHAGNES AND SRATEGY WITH INTERNAL STAFF.	2.90	840.00	2,436.00
05/31/20	SVA	REVIEW/REVISION OF CASH COLLATERAL OBJECTION	3.60	800.00	2,880.00
05/31/20	SVA	T/C W/ CARNES RE CASH COLLATERAL OBJECTION	0.40	800.00	320.00
05/31/20	SYC	CALLS AND EMAILS RE: CASH COLLATERAL OBJECTION AND PROVINCE DECLARATION	1.90	650.00	1,235.00
05/31/20	GDD	FOLLOW UP CALL WITH S. CARNES RE: CASH COLLATERAL OBJECTION	0.20	600.00	120.00
05/31/20	SVA	T/C W/ DEAN RE CASH COLLATERAL OBJECTION	0.60	800.00	480.00
05/31/20	GDD	REVIEW PLEADINGS AND DOCUMENTS RE: LITIGATION STRATEGY FOR CASH COLLATERAL OBJECTION	1.00	600.00	600.00
05/31/20	SYC	REVIEW COMMENTS FROM CS TEAM ON CC OBJECTION (1.2); REVISE OBEJECTION ACCORDINGLY (3.7)	4.90	650.00	3,185.00
05/31/20	GDD	FURTHER REVISIONS TO CASH COLLATERAL MOTION	1.40	600.00	840.00

COLE SCHOTZ P.C.

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS
Client/Matter No. 61201-0001

Invoice Number 866593
July 13, 2020
Page 4

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
06/01/20	SYC	CALL WITH PROVINCE ON BUDGET AND HUYGENS DECLARATION	1.00	650.00	650.00
06/01/20	SYC	EMAILS RE: CC OBJECTION	0.40	650.00	260.00
06/01/20	GDD	REVIEW AND CONDUCT ADDITIONAL RESEARCH RE: VARIOUS CASH COLLATERAL OBJECTION ISSUES	2.00	600.00	1,200.00
06/01/20	GDD	REVIEW/ANALYSIS OF DOCUMENTS, COMMUNICATIONS AND RELATED PLEADINGS RE: EVIDENTIARY ISSUES FOR POTENTIAL CASH COLLATERAL HEARING	2.40	600.00	1,440.00
06/01/20	SVA	FURTHER REVIEW/REVISION OF CASH COLLATERAL OBJECTION	1.10	800.00	880.00
06/01/20	SVA	T/C W/ PROVINCE RE DECLARATION IN SUPPORT OF CASH COLLATERAL OBJECTION	0.80	800.00	640.00
06/01/20	BLW	CORRESPOND WITH MS. CARNES RE: MOTIONS TO SEAL IN SD TEX.	0.10	350.00	35.00
06/01/20	SVA	T/C W/ J. ALTMAN RE CASH COLLATERAL OBJECTION	0.40	800.00	320.00
06/01/20	SYC	REVIEW SVA COMMENTS TO CC OBJECTION AND REVISE OBJECTION ACCORDING TO SAME	3.20	650.00	2,080.00
06/01/20	GDD	FURTHER REVIEW OF DRAFT OBJECTION TO CASH COLLATERAL	1.50	600.00	900.00
06/01/20	GDD	CALL WITH P. HUYGENS, S. VAN AALTEN (PARTIAL) AND M. WARNER (PARTIAL) RE: CASH COLLATERAL OBJECTION	1.00	600.00	600.00
06/01/20	SYC	CALL WITH COOLEY RE: CASH COLLATERAL OBJECTION	0.30	650.00	195.00
06/02/20	SVA	CORRES W/ DEBTORS AND LENDERS RE CASH COLLATERAL OBJECTION AND SETTLEMENT DISCUSSIONS	0.80	800.00	640.00
06/02/20	SYC	REVIEW DRAFT HUYGENS DEC. AND REVISE SAME	3.40	650.00	2,210.00
06/02/20	SYC	CALL WITH PROVINCE AND COOLEY RE: CASH COLLATERAL	0.50	650.00	325.00
06/02/20	SVA	REVIEW/COMMENT ON HUYGENS DECLARATION IN SUPPORT OF CASH COLLATERAL OBJECTION	0.60	800.00	480.00
06/02/20	SVA	REVIEWED PROPOSED FINAL CASH COLLATERAL ORDER FROM DEBTORS	0.40	800.00	320.00
06/02/20	SVA	FOLLOW UP UCC PROFESSIONALS CALL RE CASH COLLATERAL STRATEGY	0.60	800.00	480.00
06/02/20	SVA	UCC PROFESSIONALS CALL RE CASH COLLATERAL STRATEGY	0.60	800.00	480.00
06/02/20	SVA	CORRES W/ CARNES RE REVISIONS TO CC OBJECTION	0.40	800.00	320.00

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06/02/20	SVA	REVIEW/REVISION OF CASH COLLATERAL OBJECTION	2.80	800.00	2,240.00
06/02/20	SYC	EMAILS RE: MOTION TO SEAL (.5); REVIEW NDA FOR PROVISIONS ON SAME (.2)	0.70	650.00	455.00
06/02/20	SYC	EMAILS AND CALLS WITH PROVINCE ON CC	0.90	650.00	585.00
06/02/20	SYC	REVISE DRAFT CC OBJECTION (3.1) AND EMAIL TO UCC RE: SAME (.3)	3.40	650.00	2,210.00
06/03/20	SYC	CALL WITH D. DEAN RE: HUYGENS DEC. FOR CC OBJECTION	0.80	650.00	520.00
06/03/20	SVA	CORRES W/ PROVINCE RE CASH COLLATERAL NEGOTIATIONS	0.60	800.00	480.00
06/03/20	SVA	T/C W/ J. ALTMAN AND P. HUYGENS RE CASH COLLATERAL NEGOTIATIONS	0.70	800.00	560.00
06/03/20	SVA	T/C W/ DEBTORS AND LENDERS RE CASH COLLATERAL NEGOTIATIONS	0.70	800.00	560.00
06/03/20	GDD	CALL WITH J. ALTMAN, S. FOX, P. HUYGENS, S. VAN AALTEN, M. BROWN AND S. CARNES RE: CASH COLLATERAL BUDGET AND RELATED SETTLEMENT ISSUES	0.70	600.00	420.00
06/03/20	SVA	CORRES W/ CARNES RE REVISIONS TO CASH COLLATERAL RODER	0.40	800.00	320.00
06/03/20	SYC	CALL WITH PROVINCE, BRG, DEBTORS, AND LENDERS RE: SETTLEMENT	0.70	650.00	455.00
06/03/20	GDD	CALL WITH S. CARNES RE: DECLARATION IN SUPPORT OF CASH COLLATERAL OBJECTION	0.80	600.00	480.00
06/03/20	SVA	T/C W/ J. ALTMAN RE CASH COLLATERAL NEGOTIATIONS	0.60	800.00	480.00
06/03/20	SYC	CALLS WITH PROVINCE RE: CASH COLLATERAL	0.80	650.00	520.00
06/03/20	SYC	REVIEW BUDGET DETAIL (.7) AND REVISE HUYGENS DECLARATION (5.2)	5.90	650.00	3,835.00
06/03/20	SVA	REVIEW/COMMENT ON HUYGENS DECLARATION IN SUPPORT OF CASH COLLATERAL OBJECTION	0.60	800.00	480.00
06/03/20	GDD	REVIEW DRAFT REVISED OBJECTION TO CASH COLLATERAL AND DECLARATION	1.80	600.00	1,080.00
06/04/20	SVA	REVIEW/COMMENT TO REVISED CASH COLLATERAL ORDER	0.70	800.00	560.00
06/04/20	SYC	DRAFT PROPOSED LANGUAGE RE: MARSHALING/ADEQUATE PROTECTION FOR CC SETTLEMENT AND EMAILS RE: SAME	0.90	650.00	585.00
06/04/20	SYC	CALL RE: BUDGET DILIGENCE WITH PROVINCE/DEBTORS	0.60	650.00	390.00
06/04/20	SVA	T/C W/ HUYGENS RE BUDGET AND CASH COLLATERAL NEGOTIATIONS	0.40	800.00	320.00

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06/04/20	SVA	T/C W/ PROVINCE, BRG AND K&E RE CASH COLLAERAL NEGOTIATIONS	0.90	800.00	720.00
06/04/20	GDD	REVIEW DOCUMENTS RE: CASH COLLATERAL OBJECTION ISSUES AND POTENTIAL EXHIBITS FOR TRIAL	2.70	600.00	1,620.00
06/04/20	SYC	CALL WITH DEBTORS: CONFIDENTIAL INFO/SEALING	0.40	650.00	260.00
06/04/20	SYC	REVISE CC OBJECTION (.8) AND PROVINCE DECLARATION (2.6)	3.40	650.00	2,210.00
06/04/20	SYC	REVIEW DIP BUDGET AND EMAIL TO SVA RE: FEE REPORTING REQUIREMENTS	0.50	650.00	325.00
06/04/20	SVA	CORRES W/ K&E RE CASH COLLATERAL NEGOTIATIONS	0.80	800.00	640.00
06/04/20	SVA	CORRES W/ DEAN AND CARNES RE CASH COLLATERAL NEGOTIATIONS	0.40	800.00	320.00
06/04/20	GDD	FURTHER REVIEW OF DECLARATION IN SUPPORT OF CASH COLLATERAL OBJECTION	0.60	600.00	360.00
06/05/20	SYC	REVISIONS TO CC OBJECTION (.9) AND PROVINCE DECLARATION (1.9)	2.80	650.00	1,820.00
06/05/20	SVA	T/C W/ HUYGENS AND INDYKE RE CASH COLLATERAL NEGOTIATIONS	0.70	800.00	560.00
06/05/20	SVA	CORRES W/ LENDERS RE CASH COLLATERAL NEGOTIATIONS	0.40	800.00	320.00
06/05/20	SVA	T/C W/ COOLEY AND PROVINCE RE CASH COLLATERAL, KEIP AND CONSULTING AGREEMENT	0.60	800.00	480.00
06/06/20	SYC	EMAILS RE: STATUS OF CC OBJECTION AND PROVINCE DEC	0.30	650.00	195.00
06/06/20	SVA	CORRES W/ DEBTORS AND LENDERS RE CASH COLLATERAL NEGOTIATIONS	0.60	800.00	480.00
06/06/20	GDD	DRAFT/REVISE OBJECTION TO CASH COLLATERAL MOTION	3.30	600.00	1,980.00
06/06/20	SVA	REVIEW/COMMENT ON REVISED HUYGENS DECLARATION TO CASH COLLATERAL OBJECTION	0.60	800.00	480.00
06/06/20	GDD	REVIEW AND ANALYSIS OF VARIOUS PLEADINGS AND DOCUMENTS RE: CASH COLLATERAL OBJECTION AND DECLARATION	2.20	600.00	1,320.00
06/07/20	SVA	CORRES W/ DEAN AND CARNES RE REVISIONS TO HUYGENS DECLARATION IN SUPPORT OF CASH COLLATERAL OBJECTION	0.70	800.00	560.00
06/07/20	SYC	EMAILS TO D. DEAN ON CASH COLLATERAL	0.50	650.00	325.00
06/07/20	SVA	CORRES W/ ALTMAN RE CASH COLLATERAL NEGOTIATIONS	0.30	800.00	240.00
06/07/20	SYC	DRAFT W&E LIST AND PREPARE EXHIBITS (1.6); EMAILS RE: SAME (1.1)	2.70	650.00	1,755.00

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06/07/20	SVA	CORRES W/ INDYKE RE CASH COLLATERAL NEGOTIATIONS	0.40	800.00	320.00
06/07/20	SVA	REVIEW/COMMENT ON REVISED CASH COLLATERAL OBJECTION AND HUYGENS DECLARATION IN SUPPORT	0.70	800.00	560.00
06/07/20	SYC	REVISIONS TO CC OBJECTION AND PROVINCE DEC (2.9) AND EMAIL TO DEBTORS FOR REDACTIONS (.2)	3.10	650.00	2,015.00
06/07/20	SVA	REVIEWED FURTHER REVISIONS TO CASH COLLATERAL OBJECTION AND HUYGENS DECLARATION IN SUPPORT	0.60	800.00	480.00
06/07/20	GDD	CONTINUE TO WORK ON DRAFT OF CASH COLLATERAL OBJECTION AND RELATED DECLARATION	2.60	600.00	1,560.00
06/07/20	SYC	EMAIL TO PROVINCE RE: OPEN CC ISSUES FOR DEC	0.40	650.00	260.00
06/08/20	SVA	T/C W/ I. GOLD RE STUB RENT AND UCC CASH COLLATERAL NEGOTIATIONS	0.40	800.00	320.00
06/08/20	SVA	T/C W/ INDYKE RE CASH COLLATERAL NEGOTIATIONS	0.20	800.00	160.00
06/08/20	GDD	REVIEW FURTHER REVISED CASH COLLATERAL OBJECTION, DECLARATION AND DRAFT WITNESS LIST	1.30	600.00	780.00
06/08/20	SVA	FURTHER CORRES W/ ALTMAN AND FOX RE CASH COLLATERAL NEGOTIATIONS	0.70	800.00	560.00
06/08/20	GDD	CONTINUE PREPARATION OF EXAMINATIONS AND ARGUMENT FOR HEARING PRIOR TO SETTLEMENT OF CASH COLLATERAL OBJECTION	1.60	600.00	960.00
06/08/20	SYC	CALLS WITH SVA RE: SETTLEMENT NEGOTIATIONS	0.50	650.00	325.00
06/08/20	SVA	REVIEWED DEBTOR COMMENTS TO UCC CASH COLLATERAL OBJECTION AND HUYGENS DECLARATION	0.30	800.00	240.00
06/08/20	SVA	FURTHER REVISION OF CASH COLLATERAL OBJECTION AND HUYGENS DECLARATION IN SUPPORT	1.30	800.00	1,040.00
06/08/20	SVA	CORRES W/ CARNES AND WALLEN RE WITNESS AND EXHIBIT LIST FOR CASH COLLATERAL OBJECTION	0.40	800.00	320.00
06/08/20	SVA	T/C W/ HUYGENS RE CASH COLLATERAL NEGOTIATIONS	0.60	800.00	480.00
06/08/20	SVA	T/C W/ ALTMAN RE CASH COLLATERAL NEGOTIATIONS	0.40	800.00	320.00
06/08/20	SVA	REVIEWED COULOMBE AND CROWELEY DECLARATIONS IN SUPPORT OF CASH COLLATERAL MOTION	0.40	800.00	320.00

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06/08/20	SVA	CORRES W/ UCC MEMBERS RE CASH COLLATERAL NEGOTIATIONS	0.80	800.00	640.00
06/08/20	SYC	REVIEW DEBTOR COMMENTS ON CC OBJECTION (.4); CALL WITH SVA RE: SAME (.2); REVISE OBJECTION ACCORDING TO SAME (.5)	1.10	650.00	715.00
06/08/20	SYC	CALLS WITH PROVINCE RE: OPEN ISSUES RE: FINANCIALS	0.60	650.00	390.00
06/08/20	GDD	REVIEW/ANALYSIS OF EXHIBITS AND RELATED DOCUMENTS RE: CASH COLLATERAL HEARING AND OBJECTION THERETO	3.30	600.00	1,980.00
06/08/20	SYC	FINALIZE W&E LIST AND EXHIBITS, AND EMAILS RE SAME	2.10	650.00	1,365.00
06/08/20	SYC	PREPARE MOTION TO SEAL CC OBJECTIO	1.40	650.00	910.00
06/08/20	SVA	T/C W/ FOX AND ALTMAN RE CASH COLLATERAL NEGOTIATIONS	0.50	800.00	400.00
06/08/20	SVA	CORRES W/ K. SIMARD RE CASH COLLATERAL NEGOTIATIONS	0.40	800.00	320.00
06/09/20	JRA	EMAILS WITH S. VAN AALTEN AND COMMITTEE MEMBERS RE CASH COLLATERAL SETTLEMENT AND GENERAL CASE UPDATE	0.20	625.00	125.00
06/09/20	SYC	REVISE CC ORDER TO REFLECT TERMS OF SETTLEMENT	1.50	650.00	975.00
06/09/20	SVA	CORRES W/ LLS RE STUB RENT AND CASH COLLATERAL NEGOTIATIONS	0.70	800.00	560.00
06/09/20	SVA	CORRES W/ ALTMAN RE REVISED CASH COLLATERAL ORDER AND BUDGET	0.60	800.00	480.00
06/09/20	SVA	REVIEWED FURTHER REVISIONS TO CASH COLLATERAL ORDER AND BUDGET	0.60	800.00	480.00
06/09/20	SVA	CORRES W/ PROVINCE RE REVISED CASH COLLATERAL BUDGET	0.70	800.00	560.00
06/09/20	SVA	CORRES W/ LENDERS RE CASH COLLATERAL NEGOTIATIONS	0.60	800.00	480.00
06/09/20	SVA	REVIEW/COMMENT TO REVISED CASH COLLATERAL ORDER AND BUDGET	1.60	800.00	1,280.00
06/09/20	GDD	REVIEW DRAFT FINAL CASH COLLATERAL ORDER AND COMMUNICATIONS RE: SAME	0.40	600.00	240.00
06/09/20	SYC	REVIEW MULTIPLE REVISIONS TO CC ORDER AND EMAILS RE: SAME	1.30	650.00	845.00
06/09/20	SVA	CORRES W/ UCC MEMBERS RE CASH COLLATERAL SETTLEMENTY NEGOTIATIONS	0.80	800.00	640.00
06/10/20	MDW	FINAL PREP FOR AND ATTEND HEARING WITH CO-COUNSEL RE CASH COLLATERAL, KERP, ETC.	1.30	840.00	1,092.00
06/10/20	SVA	CORRES W/ UCC MEMBERS RE RESULTS OF CASH COLLATERAL HEARING	0.60	800.00	480.00

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06/10/20	AZG	ATTENDED TELEPHONE HEARING ON CASH COLLATERAL.	1.10	290.00	319.00
06/11/20	SVA	REVIEWED REVISED CASH COLLATERAL ORDER RE TEXAS TAXING AUTHORITIES REVISIONS	0.40	800.00	320.00
06/14/20	GDD	PRELIMINARY REVIEW OF SELECTED PLEADINGS AND LOAN DOCUMENTS RE: STRUCTURE, LOANS AND LIEN ISSUES	2.60	600.00	1,560.00
06/15/20	GDD	CALL WITH S. VAN AALTEN AND S. CARNES RE: LIEN REVIEW ISSUES	0.30	600.00	180.00
06/16/20	AZG	CIRCULATED CASH COLLATERAL DOCUMENTS FOR REVIEW.	0.20	290.00	58.00
06/17/20	GDD	PRELIMINARY REVIEW AND ANALYSIS OF LENDERS' LOAN AND RELATED DOCUMENTS	2.20	600.00	1,320.00
06/19/20	SVA	CORRES W/ HUYGENS RE DIP BUDGET PERFORMANCE	0.40	800.00	320.00
06/19/20	GDD	PRELIMINARY REVIEW/ANALYSIS OF LOAN DOCUMENTS RE: LIEN REVIEW ISSUES	1.80	600.00	1,080.00
06/19/20	GDD	CALL WITH A. GARRASTEGUI RE: LIEN REVIEW AND LOAN DOCUMENT ISSUES	0.50	600.00	300.00
06/20/20	GDD	REVIEW/ANALYSIS OF LENDER DOCUMENTS RE: LIEN ISSUES	2.20	600.00	1,320.00
06/22/20	GDD	CONTINUE REVIEW AND ANALYSIS OF DOCUMENTS AND LIENS OF LENDERS	2.40	600.00	1,440.00
06/23/20	GDD	REVIEW LENDER DOCUMENTS AND PRELIMINARY ANALYSIS OF DOCUMENTS NEEDED AND PRELIMINARY LIEN ISSUES ON SELECTED ASSETS	2.20	600.00	1,320.00
06/23/20	GDD	CONTINUE REVIEW/ANALYSIS OF ABL LIEN ISSUES	1.30	600.00	780.00
06/27/20	GDD	CALL WITH R. IORIO RE: WELLS FARGO DOCUMENTS AND RELATED ISSUES	0.30	600.00	180.00
06/28/20	GDD	CALL WITH I. WALKER RE: LIEN REVIEW AND BACKGROUND ISSUES	0.90	600.00	540.00
06/28/20	GDD	CONTINUE RESEARCH RE: LIEN AVOIDANCE ISSUES	1.40	600.00	840.00
06/29/20	AZG	REVIEWED CASH COLLATERAL ORDER.	0.40	290.00	116.00
06/30/20	IEW	REVIEW LOAN DOCUMENTS AS PART OF DUE DILIGENCE FOR CHALLENGE TO LENDERS' POSITION	0.30	675.00	202.50

ASSET DISPOSITIONS, SALES, USES, AND LEASES (SECTION 363) 8.50 6,395.00

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05/24/20	SVA	KICK OFF CALL W/ DEBTOR PROFESSIONALS RE SALE PROCESS	0.80	800.00	640.00
05/24/20	SVA	T/C W/ S. BALASIANO RE SALE PROCESS	0.60	800.00	480.00

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05/24/20	SVA	T/C W/ P. HUGYENS RE SALE PROCESS	0.40	800.00	320.00
05/25/20	SYC	REVIEW SALE NOTICE	0.30	650.00	195.00
05/26/20	SVA	REVIEWED SALE PROCESS CONTACT LOG	0.40	800.00	320.00
05/26/20	SVA	T/C W/ DEBTOR PROFESSIONALS RE SALE PROCESS UPDATE	0.70	800.00	560.00
05/27/20	SVA	T/C W/ S. BALASIANO RE SALE PROCESS	0.40	800.00	320.00
06/01/20	SYC	UPDATE CALL WITH DEBTORS RE: SALE PROCESS AND OTHER MATTERS	0.40	650.00	260.00
06/01/20	SVA	WEEKLY UPDATE CALL W/ DEBTORS RE SALE PROCESS AND LIQUIDATIONS	0.40	800.00	320.00
06/08/20	SVA	WEEKLY SALE UPDATE CALL W/ DEBTOR ADVISORS	0.40	800.00	320.00
06/08/20	SVA	REVIEWED PJS SALE UPDATE LOG	0.10	800.00	80.00
06/15/20	SVA	T/C W/ DEBTOR PROFESSIONALS RE SALE PROCESS UPDATE	0.40	800.00	320.00
06/16/20	SYC	REVIEW PROVINCE DEC ON SALE PROCESS AND BUSINESS OPERATIONS	0.30	650.00	195.00
06/16/20	SYC	REVIEW PHASE 2 CLOSING STORES AND EMAILS RE: SAME	0.50	650.00	325.00
06/18/20	SVA	REVIEWED IOI FROM PROSPECTIVE BIDDER	0.40	800.00	320.00
06/19/20	SYC	REVIEW IOI AND EMAILS RE: SAME	0.50	650.00	325.00
06/22/20	SYC	CALL WITH COMPANY'S ADVISORS RE: SALE PROCESS AND REVIEW EMAILS ON SAME	0.50	650.00	325.00
06/23/20	SVA	REVIEWED WELLS FARGO RESPONSE LETTER TO GOING CONCERN IOI	0.20	800.00	160.00
06/23/20	SVA	CORRES W/ PROVINCE RE SALE PROCESS UPDATE	0.20	800.00	160.00
06/23/20	SYC	REVIEW WELLS FARGO LETTER RE: SALE PROCESS	0.20	650.00	130.00
06/29/20	SVA	WEEKLY ESTATE PROFESSIONALS CALLS RE SALE PROCESS	0.40	800.00	320.00

RETENTION MATTERS**49.70****33,802.50**

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05/22/20	SVA	REVIEWED DEBTOR INTERESTED PARTIES LIST FOR CONFLICTS	0.70	800.00	560.00
05/22/20	SVA	CORRES W/ M. WARNER RE RETENTION PREP	0.40	800.00	320.00
05/22/20	JRA	CORRESPOND WITH S. VAN AALTEN RE RETENTION ISSUES	0.20	625.00	125.00
05/26/20	JRA	EMAILS WITH S. VAN AALTEN, M. WARNER, S. CARNES AND D. DACHELET RE RETENTION APPS AND OTHER INITIAL ITEMS	0.50	625.00	312.50
05/26/20	SYC	EMAILS RE: RETENTION APPLICATIONS (.4); REVIEW LOCAL FORMS RE: SAME (.2)	0.60	650.00	390.00

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05/27/20	SVA	CORRES W/ A. SACCULLO RE ENGAGMENT LETTER	0.20	800.00	160.00
05/30/20	SYC	BRIEF REVIEW OF DEBTOR RETENTION APPLICATIONS	0.50	650.00	325.00
05/30/20	SYC	EMAIL TO S. SALLIE RE: CS RETENTION DRAFT	0.60	650.00	390.00
06/01/20	SVA	CORRES W/ CS ATTORNEYS RE CONFLICTS ISSUES FOR RETENTION APPLICATION	0.60	800.00	480.00
06/01/20	JRA	EMAILS WITH S. CARNES RE RETENTION APP	0.20	625.00	125.00
06/02/20	SVA	REVIEWED CONFLICTS FOR RETENTION APPLICATION	0.80	800.00	640.00
06/03/20	BLW	COORDINATE WITH MS. LABRADA RE: GO FORWARD ADMINISTRATIVE COORDINATION WITH CO-COUNSEL.	0.20	350.00	70.00
06/03/20	BLW	COORDINATE WITH MR. WARNER RE: CO-COUNSEL ROLE AND NEXT STEPS IN CASE.	0.20	350.00	70.00
06/03/20	SVA	ATTENTION TO RETENTION APPLICATION ISSUES	0.40	800.00	320.00
06/04/20	SYC	EMAILS RE: CONFLICTS	0.30	650.00	195.00
06/05/20	SYC	REVIEW PJS RETENTION APPLICATION (.9); AND CALLS WITH PROVINCE RE: SAME (.4)	1.30	650.00	845.00
06/05/20	SVA	REVIEWED PJS RETENTION APPLICATION	0.60	800.00	480.00
06/05/20	SVA	CORRES W/ PROVINCE RE PJS RETENTION	0.30	800.00	240.00
06/07/20	MDW	PROVIDE COMMENT TO STAFF ATTORNEYS RE EMPLOYMENT APPLICATION ISSUES FOR SD TX.	0.20	840.00	168.00
06/08/20	SKN	REVIEW AND REVISE RETENTION APPLICATION DOCUMENTS.	1.10	325.00	357.50
06/09/20	SYC	REVISIONS TO RETENTION APP AND DRAFT SUPPORTING DECLARATIONS	1.60	650.00	1,040.00
06/10/20	SVA	CORRES W/ S. CARNES RE PREPARATION OF RETENTION APPLICATION	0.30	800.00	240.00
06/10/20	SYC	REVISIONS TO RETENTION APPLICATION AND REVIEW CONFLICTS FOR DISCLOSURES	1.40	650.00	910.00
06/11/20	SYC	REVIEW AND REVISE CS RETENTION APPLICATION, ORDER, AND CHAIRPERSON DEC (1.3); DRAFT VAN AALTEN DEC (1.4), DRAFT BUDGET (.5)	3.20	650.00	2,080.00
06/12/20	SVA	REVIEW/COMMENT ON CS RETENTION APPLICATION AND DECLARATION	0.80	800.00	640.00
06/12/20	SYC	REVIEW CONFLICTS RESULTS (.6); REVISE RETENTION MATERIALS (2.6); EMAILS RE: SAME (.4)	3.60	650.00	2,340.00
06/13/20	SVA	T/C W/ CARNES RE CS AND COOLEY RETENTION APPLICATION COMMENTS	0.40	800.00	320.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
06/13/20	SVA	CORRES W/ INDYKE RE RETENTION APPLICATIONS	0.40	800.00	320.00
06/13/20	SYC	CALLS AND EMAILS RE: RETENTION APPLICATIONS	0.30	650.00	195.00
06/14/20	SVA	REVIEW/COMMENT ON COOLEY RETENTION APPLICATION	0.40	800.00	320.00
06/14/20	SYC	REVIEW AND REVISE COOLEY RETENTION MATERIALS (1.2); EMAILS RE: SAME (.3)	1.50	650.00	975.00
06/15/20	JRA	EMAILS WITH S. VAN AALTEN AND M. WARNER RE RETENTION APPS	0.10	625.00	62.50
06/15/20	SYC	REVISIONS TO COOLEY, PROVINCE, AND COLE SCHOTS RETENTION MATERIALS (3.1) AND EMAILS RE: SAME (.4)	2.90	650.00	1,885.00
06/15/20	SVA	REVIEW/COMMENT ON PROVINCE RETENTION APPLICATION	0.60	800.00	480.00
06/16/20	SYC	EMAILS WITH COOLEY RE: PJS NEGOTIATIONS	0.50	650.00	325.00
06/16/20	SVA	REVIEWED CORRES RE PJS RETENTION	0.30	800.00	240.00
06/16/20	SYC	FINALIZE COLE SCHOTZ, COOLEY, PROVINCE RETENTION MATERIALS AND EMAIL TO COMMITTEE RE: SAME	0.80	650.00	520.00
06/16/20	SYC	REVIEW SUMMARIES OF DEBTOR RETENTION APPS FROM S. NACE AND REVISE SAME	1.30	650.00	845.00
06/17/20	SYC	REVIEW COOLEY EMAILS RE: PJS NEGOTIATIONS	0.40	650.00	260.00
06/17/20	SYC	REVIEW JCP CONFLICTS DISCLOSURES (.8) AND REVISE RETENTION MATERIALS (1.9) AND EMAIL TO SVA RE: SAME (.1); EMAILS RE: BUDGET (.3)	3.10	650.00	2,015.00
06/17/20	SVA	CORRES W/ COOLEY RE POTENTIAL PJS RETENTION OBJECTION	0.30	800.00	240.00
06/18/20	MDW	REVIEW DRAFT OBJECTION TO SOLOMON RETENTION; CALL WITH CO-COUNSEL RE SUGGESTED CHANGE TO SAME.	0.60	840.00	504.00
06/18/20	SVA	REVIEW/COMMENT TO PJS OBJECTION	0.60	800.00	480.00
06/18/20	JRA	EMAILS WITH M. WARNER RE RETENTION APPS	0.20	625.00	125.00
06/18/20	SYC	REVIEW LIMITED PJS OBJECTION FROM COOLEY AND EMAILS RE: SAME	0.60	650.00	390.00
06/18/20	MDW	REVIEW COMMITTEE PROFESSIONALS RETENTION APPLICATION DRAFTS IN PREP FOR DISCUSSION WITH UST; AND MULTIPLE EMAILS WITH UST RE SAME.	1.60	840.00	1,344.00
06/19/20	SVA	CORRES W/ UCC PROFESSIONALS RE RETENTION APPLICATIONS	0.60	800.00	480.00
06/19/20	SYC	EMAILS TO NIKE RE: RETENTION APPLICATIONS	0.70	650.00	455.00

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06/20/20	SVA	REVIEWED PJS RETENTION PROPOSAL	0.40	800.00	320.00
06/21/20	SVA	REVIEW/COMMENT ON REVISED PJS RETENTION ORDER	0.40	800.00	320.00
06/22/20	SYC	REVIEW COMMENTS FROM UST RE: COOLEY, PROVINCE, AND CS RETENTION APPLICATIONS	1.00	650.00	650.00
06/22/20	FP	PREPARE FOR FILING APPLICATION TO EMPLOY COLE SCHOTZ AS CO-COUNSEL FOR THE COMMITTEE, WITH EXHIBITS AND EFILE	0.40	305.00	122.00
06/22/20	FP	DOWNLOAD FILED COPIES OF APPLICATIONS TO EMPLOY (1) COLE SCHOTZ (2) COOLEY AND (3) PROVINCE, WITH EXHIBITS AND CIRCULATE TO PARTIES	0.30	305.00	91.50
06/22/20	SYC	REVISE CS AND PROVINCE FEE APPLICATIONS/ORDERS PER COMMENTS FROM UST (2.1); PREPARE FEE APPLICATIONS FOR FILING (.9)	3.00	650.00	1,950.00
06/22/20	MDW	REVIEW UST COMMENTS TO COMMITTEE RETENTION APPLICATIONS.	0.50	840.00	420.00
06/22/20	FP	PREPARE FOR FILING APPLICATION TO EMPLOY PROVINCE AS FINANCIAL ADVISORS FOR THE COMMITTEE, WITH EXHIBITS AND EFILE	0.40	305.00	122.00
06/22/20	FP	PREPARE FOR FILING APPLICATION TO EMPLOY COOLEY AS CO-COUNSEL FOR THE COMMITTEE, WITH EXHIBITS AND EFILE	0.40	305.00	122.00
06/22/20	MDW	FINAL REVIEW OF COMMITTEE PROFESSIONALS APPLICATIONS TO EMPLOY AND APPROVE FOR FILING.	1.10	840.00	924.00
06/22/20	SVA	CORRES W/ TEAM RE FILING AND SERVICE OF UCC RETENTION APPLICATIONS	0.30	800.00	240.00
06/22/20	SVA	CORRES W/ UCC PROFESSIONALS RE UST RETENTION COMMENTS	0.40	800.00	320.00
06/26/20	SVA	REVIEWED REVISED PLAN AND DS	0.90	800.00	720.00
06/26/20	SVA	REVIEWED SUPPLEMENTAL DECLARATION FOR PJS RETENTION	0.20	800.00	160.00
06/30/20	KLL	CORRESPOND WITH JUDGE'S CLERK RE RETENTION APPLICATIONS	0.10	265.00	26.50
06/30/20	SVA	CORRES W/ PROVINCE RE RETENTION APPLICATION	0.20	800.00	160.00
06/30/20	MDW	ADDRESS RETENTION ISSUES WITH UST.	0.40	840.00	336.00
06/30/20	SYC	EMAILS RE: UCC RETENTION APP COMMENTS FROM UST	0.30	650.00	195.00

OTHER INVESTIGATIVE MATTERS**47.20****19,655.00**

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05/27/20	SYC	REVIEW HISTORICAL DIVIDEND PAYMENTS AND RESEARCH ON SAME	0.70	650.00	455.00
06/10/20	AZG	REVIEWED CASE HISTORY.	0.50	290.00	145.00
06/16/20	RMI	CONFERENCE WITH CO-COUNSEL RE: LOAN STRUCTURE AND COMMITTEE INVESTIGATION	0.80	670.00	536.00
06/16/20	GDD	CALL WITH A. GARRASTEGUI AND R. IORIO RE: LIEN INVESTIGATION ISSUES	0.80	600.00	480.00
06/16/20	AZG	CONFERENCE TO DISCUSS LOAN DOCUMENTS AND LIEN INVESTIGATION.	0.80	290.00	232.00
06/17/20	AZG	CORRESPONDENCE REGARDING RECENT FILINGS AND ACCESS TO LOAN DOCUMENTS.	0.30	290.00	87.00
06/17/20	AZG	REVIEWED CASH COLLATERAL DOCS FOR LIEN INVESTIGATION.	1.90	290.00	551.00
06/17/20	SYC	EMAIL TO D. DEAN RE: WELLS DEBT DOCS	0.20	650.00	130.00
06/17/20	RMI	REVIEW LOAN DOCUMENTS	1.70	670.00	1,139.00
06/18/20	AZG	CORRESPONDENCE REGARDING DOCUMENT PRODUCTION FROM CLIENT.	0.10	290.00	29.00
06/19/20	RMI	REVIEW BANKRUPTCY PETITIONS AND FIRST DAYS	0.80	670.00	536.00
06/19/20	AZG	REVIEWED LIEN DOCUMENTS FOR INVESTIGATION.	8.10	290.00	2,349.00
06/19/20	AZG	CALL REGARDING LIEN INVESTIGATION.	0.50	290.00	145.00
06/22/20	AZG	REVIEWED LOAN DOCUMENTS FOR LIEN INVESTIGATION.	6.20	290.00	1,798.00
06/23/20	RMI	REVIEW DEEDS OF TRUST	0.60	670.00	402.00
06/23/20	AZG	REVIEWED LOAN DOCUMENTS FOR LIEN INVESTIGATION.	5.10	290.00	1,479.00
06/24/20	KM	WORK ON REVIEW OF SEARCHES; PREP OF UCC LIEN CHART RE: SAME	1.00	290.00	290.00
06/25/20	KM	WORK ON MEMO AND UCC LIEN CHART IN CONNECTION WITH SEARCHES	1.50	290.00	435.00
06/27/20	GDD	CONTINUE REVIEW/ANALYSIS OF LENDER DOCUMENTS AND RELATED PLEADINGS RE: CASH COLLATERAL, ADEQUATE PROTECTION AND POTENTIAL CHALLENGES TO LIENS	3.30	600.00	1,980.00
06/27/20	GDD	CALL WITH A. GARRASTEGUI RE: POTENTIAL CHALLENGES TO LENDERS' LIENS	0.90	600.00	540.00
06/27/20	AZG	CORRESPONDENCE REGARDING LIEN REVIEW.	0.20	290.00	58.00
06/27/20	GDD	RESEARCH RE: LIEN AVOIDANCE ISSUES	2.60	600.00	1,560.00
06/27/20	AZG	CALL REGARDING LIEN REVIEW AND MEMO.	0.80	290.00	232.00
06/28/20	IEW	CALL WITH D. DEAN FOR BACKGROUND FOR ANALYSIS OF LIEN REVIEW AND POTENTIAL ISSUES FOR CHALLENGE TO SCOPE OF LENDERS' COLLATERAL	0.90	675.00	607.50

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06/29/20	IEW	BEGIN ANALYSIS OF LIEN ISSUES	2.30	675.00	1,552.50
06/29/20	GDD	REVIEW/ANALYSIS OF LENDER DOCUMENTS RE: LIEN AND CLAIM INVESTIGATION	1.60	600.00	960.00
06/30/20	IEW	CALL WITH R. IORIO TO COORDINATE LIEN REVIEW PROJECT	0.20	675.00	135.00
06/30/20	KM	WORK ON MEMO AND UCC LIEN CHART IN CONNECTION WITH SEARCHES	2.80	290.00	812.00

CLAIMS ANALYSIS, ADMINISTRATION AND OBJECTIONS **4.20** **3,092.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/23/20	JRA	ANALYZE LIEN CLAIMANTS MOTION AND PROPOSED FINAL ORDER	0.50	625.00	312.50
05/24/20	SVA	REVIEW/COMMENT ON BAR DATE MOTION	0.40	800.00	320.00
05/25/20	JRA	ANALYZE BAR DATE MOTION AND PROPOSED PROCEDURES FOR SAME	0.60	625.00	375.00
06/10/20	SVA	CORRES W/ M. DUNDON RE 507A4 EMPLOYEE WAGE CLAIMS	0.40	800.00	320.00
06/12/20	SVA	T/C W/ FED EX RE CASE STATUS AND CREDITOR DISTRIBUTIONS	0.40	800.00	320.00
06/12/20	SVA	T/C W/ M. DUNDON RE WAGE AND HOUR CLASS CLAIM UNDER 507A4	0.40	800.00	320.00
06/18/20	SVA	FURTHER CORRES W/ M. DUNDON RE WAGE AND HOUR PRIORITY CLASS CLAIM	0.40	800.00	320.00
06/19/20	SYC	REVIEW BAR DATE EMAIL FROM A. GARRASTEGUI AND PROVIDE COMMENTS TO SAME (.6); EMAIL TO COOLEY RE: SAME (.3)	0.50	650.00	325.00
06/23/20	SVA	CORRES W/ INDYKE AND HUYGENS RE PREFERENCE CLAIMS	0.30	800.00	240.00
06/23/20	SVA	REVIEWED PROVINCE PRELIMINARY PREFERENCE CLAIM ANALYSIS	0.30	800.00	240.00

CASE ADMINISTRATION **42.30** **20,203.50**

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05/22/20	SVA	CORRES W/ K&E RE INITIAL MATTERS	0.60	800.00	480.00
05/22/20	SVA	CONF W/ COOLEY AND PROVINCE RE WORK STREAMS	0.40	800.00	320.00
05/24/20	JRA	REVIEW CROWLEY DECLARATION	0.50	625.00	312.50
05/24/20	SYC	KICK-OFF CALL WITH DEBTORS PROFESSIONALS	0.60	650.00	390.00
05/24/20	SYC	BRIEF REVIEW OF FIRST DAY PLEADINGS AND PUBLIC FILINGS	2.10	650.00	1,365.00
05/25/20	SYC	REVIEW LOCAL RULES AND PREPARE JOINT NOA (.9); EMAILS WITH COOLEY RE: SAME (.4)	1.30	650.00	845.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/26/20	KLL	FINALIZE AND FILE PRO HAC VICE RE LAZEROWITZ	0.30	265.00	79.50
05/26/20	KLL	SUBMIT APPEARANCES RE 5/27 HEARING FOR COURT	0.20	265.00	53.00
05/26/20	KLL	FINALIZE AND FILE PRO HAC VICE RE ALBERTO	0.30	265.00	79.50
05/26/20	KLL	FINALIZE AND FILE NOTICE OF APPEARANCE	0.30	265.00	79.50
05/26/20	KLL	FINALIZE AND FILE PRO HAC VICE RE BROWN	0.30	265.00	79.50
05/26/20	SYC	REVIEW LOCAL RULES AND CHAMBERS PROCEDURES (.5); CALENDAR CRITICAL DATES AND HEARINGS AND EMAILS TO TEAM RE: SAME (1.3); PREPARE PRO HACs FOR COOLEY AND CS TEAMS (1.7) AND EMAILS RE: SAME (.5); REVISE NOA ACCORDING TO COOLEY COMMENTS (.7)	4.70	650.00	3,055.00
05/26/20	KLL	FINALIZE AND FILE PRO HAC VICE RE KLEIN	0.30	265.00	79.50
05/26/20	KLL	FINALIZE AND FILE PRO HAC VICE RE INDYKE	0.30	265.00	79.50
05/26/20	KLL	FINALIZE AND FILE PRO HAC VICE RE VAN AALTEN	0.30	265.00	79.50
05/26/20	KLL	REVIEW DOCKET AND UPCOMING DATES/DEADLINES	0.10	265.00	26.50
05/26/20	KLL	FINALIZE AND FILE PRO HAC VICE RE CARNES	0.30	265.00	79.50
05/27/20	SVA	CORRES W/ INDYKE RE DIVISION OF RESPONSIBILITIES	0.20	800.00	160.00
05/27/20	KLL	DOWNLOAD AND CIRCULATE ORDERS APPROVING PRO HAC VICE'S	0.40	265.00	106.00
05/28/20	SVA	CORRES W/ UCC PROFESSIONALS RE CASE STRATEGY	0.60	800.00	480.00
05/29/20	SSS	DISCUSSION WITH CARNES AND LABRADA RE (I) CALENDARING (II) DOCKETING MONITORING STRATEGIES	0.30	305.00	91.50
05/29/20	KLL	CORRESPOND WITH COUNSEL ON FILINGS AND ECF NOTICES	0.20	265.00	53.00
05/30/20	SYC	EMAILS TO COMMITTEE MEMBERS RE: BYLAWS AND NDA	0.50	650.00	325.00
05/30/20	SYC	REVIEW LOCAL RULES RE: FILING OF EXHIBIT AND WITNESS LISTS FOR CONTESTED HEARING	0.40	650.00	260.00
05/31/20	SYC	EMAILS TO UCC MEMBERS ON ADMIN MATTERS	0.40	650.00	260.00
06/01/20	KLL	CIRCULATE FORMS OF MOTION TO SEAL AND EXPEDITE ON SAME	0.20	265.00	53.00
06/01/20	SYC	REVISIONS TO NDA AND EMAILS RE: SAME	0.60	650.00	390.00
06/01/20	SSS	DISCUSSION WITH CARNES RE CS RETENTION MOTION TEMPLATE (.30); ASSEMBLED PROOFREAD RE EXECUTED COMMITTEE NDA (.90)	1.20	305.00	366.00

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06/02/20	SSS	REVIEW AND ANALYSIS OF DRAFT IGNITE CS RETENTION (I) MOTION (II) COMMITTEE CHAIR DECLARATION (III) PROPOSED ORDER (.50); DRAFTED CS RETENTION TEMPLATE (I) MOTION (II) COMMITTEE CHAIR DECLARATION (III) PROPOSED ORDER (1.50)	2.00	305.00	610.00
06/03/20	SSS	DISCUSSION WITH COUNSEL RE MOTION TEMPLATE TO SEAL OBJECTION TO DIP MOTION (.30); REVIEW_ANALYSIS OF JCP MOTION TO SEAL OBJECTION TO DIP MOTION (.40); DRAFTED MOTION TEMPLATE RE MOTION TO SEAL OBJECTION TO DIP MOTION (.90)	1.60	305.00	488.00
06/03/20	SKN	CALL WITH S. CARNES TO GET UP TO SPEED (.2) REVIEW FIRST DAY DECLARATION OF STAGE STORES (1.1)	1.30	325.00	422.50
06/03/20	BLW	REVIEW LOCAL PRACTICE PROTOCOL AND GUIDELINES.	0.40	350.00	140.00
06/05/20	SYC	EMAILS RE: CALENDARING	0.50	650.00	325.00
06/08/20	KLL	FINALIZE AND FILE SEALED EXHIBITS RE 6-10 HEARING	0.40	265.00	106.00
06/08/20	KLL	PREPARE EXHIBITS FOR FILING WITH THE COURT RE 6-10 HEARING	0.70	265.00	185.50
06/08/20	KLL	PREPARE PRO HAC FOR D. DEAN	0.30	265.00	79.50
06/08/20	KLL	FINALIZE AND FILE WITNESS AND EXHIBIT LIST WITH EXHIBITS	0.50	265.00	132.50
06/08/20	KLL	CIRCULATE COPIES OF EXHIBITS TO THE COURT RE 6-10 HEARING	0.20	265.00	53.00
06/09/20	KLL	SUBMIT ELECTRONIC SUBMISSIONS RE COURT APPEARANCES FOR 6-10 HEARING	0.20	265.00	53.00
06/11/20	SYC	REVIEW DOCKET AND EMAIL TO SVA RE: UPCOMING DEADLINES	0.50	650.00	325.00
06/15/20	SVA	CORRES W/ WARNER AND WALLEN RE CASE UPDATE	0.20	800.00	160.00
06/16/20	SYC	EMAILS RE: SCHEDULING UCC CALLS	0.30	650.00	195.00
06/16/20	SYC	REVIEW S. NACE SUMMARY OF 341 MEETING AND COMMENT ON SAME	0.60	650.00	390.00
06/16/20	SKN	DRAFT EMAIL TO COMMITTEE REGARDING 341 MEETING (.2). CALL WITH S. CARNES RE: SAME (.2)	0.40	325.00	130.00
06/17/20	SYC	CALL WITH A. GARRASTEGUI RE: KEY DATES MEMO AND BAR DATE EMAIL TO UCC	0.50	650.00	325.00
06/17/20	AZG	CALL TO DISCUSS CASE ADMINISTRATION.	0.50	290.00	145.00
06/17/20	KLL	ELECTRONICALLY SUBMIT ATTORNEY APPEARANCES RE 6/18 HEARING	0.20	265.00	53.00

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06/17/20	MDW	REVIEW PLEADINGS FILED IN CASE THIS DATE ARE TEXAS ISSUES.	0.90	840.00	756.00
06/18/20	AZG	REVIEWED DOCKET AND DRAFTED DEADLINE CHART.	3.60	290.00	1,044.00
06/19/20	SYC	EMAILS RE: SCHEDULING (.3); INSTRUCTION TO A. GARRASTEGUI RE: ADMIN MATTERS	0.60	650.00	390.00
06/19/20	SYC	EMAILS TO D. DEAN RE: WELLS FARGO LOAN DOCS	0.30	650.00	195.00
06/19/20	SYC	REVIEW CRITICAL DATES MEMO AND PROVIDE COMMENTS TO A. GARRASTEGUI RE: SAME	0.90	650.00	585.00
06/20/20	SVA	REVIEWED SOFA AND SCHEDULES	0.70	800.00	560.00
06/22/20	AZG	REVISED CRITICAL DEADLINE CHART.	2.10	290.00	609.00
06/22/20	SVA	WEEKLY DEBTOR/UCC PROFESSIONALS UPDATE CALL	0.40	800.00	320.00
06/23/20	AZG	REVIEWED DOCKET, CALENDARED OBJECTION DEADLINES AND UPDATED TEAM ON CASE STATUS.	0.90	290.00	261.00
06/23/20	AZG	ENTERED APPEARANCE FOR COMMITTEE COUNSEL.	0.20	290.00	58.00
06/23/20	SYC	REVIEW AND REVISE CRITICAL DATES CHART (.5); EMAILS TO J. INDYKE RE: UPCOMING HEARINGS (.2)	0.70	650.00	455.00
06/26/20	SYC	UPDATE CASE CALENDAR	0.30	650.00	195.00
06/26/20	AZG	CORRESPONDENCE REGARDING LEASE REJECTION NOTICES.	0.10	290.00	29.00
06/28/20	AZG	CORRESPONDENCE REGARDING SCHEDULES.	0.20	290.00	58.00
06/29/20	AZG	CALENDARED DEADLINES.	0.10	290.00	29.00
06/29/20	AZG	REVIEWED DOCKET AND INFORMED TEAM ABOUT CURRENT LEASE REJECTIONS.	0.60	290.00	174.00
06/30/20	KLL	SUBMIT ELECTRONIC SUBMISSIONS RE 6/30 HEARING FOR COUNSEL	0.20	265.00	53.00
06/30/20	AZG	REVIEWED DOCKET AND NOTICE OF REJECTION.	0.20	290.00	58.00
06/30/20	AZG	CORRESPONDENCE REGARDING AND NOTICES.	0.10	290.00	29.00

CREDITOR INQUIRIES**3.50****2,471.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
06/10/20	MDW	ADDRESS CORRESPONDENCE AND CALLS FROM CREDITORS.	0.50	840.00	420.00
06/12/20	JRA	T/C'S WITH S. VAN AALTEN AND VENDOR REGARDING POST PETITION CREDIT AND PLAN ISSUES	0.50	625.00	312.50

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06/22/20	MDW	MULTIPLE CALLS & E-MAILS FROM COUNSEL FOR CREDITORS RE GENERAL INFORMATION REQUESTS.	0.60	840.00	504.00
06/26/20	SYC	RESPOND TO CREDITOR INQUIRIES	0.70	650.00	455.00
06/29/20	SYC	RESPOND TO CREDITOR INQUIRIES	0.60	650.00	390.00
06/30/20	SYC	RESPOND TO CREDITOR INQUIRIES	0.60	650.00	390.00
GENERAL			4.10		3,248.00

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/24/20	MDW	KICK-OFF CALL AMONG DEBTORS AND COMMITTEE.	0.80	840.00	672.00
05/24/20	MDW	REVIEW VARIOUS FIRST DAY PLEADINGS AND OTHER FILINGS FOR GENERA BACKGROUND INFORMATION.	2.90	840.00	2,436.00
06/08/20	BLW	ADDRESS LOCAL PRACTICE ISSUES RE: WITNESS AND EXHIBIT LISTS WITH CO-COUNSEL.	0.40	350.00	140.00
PREPARATION FOR AND ATTENDANCE AT HEARINGS			22.30		14,781.50

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05/26/20	SVA	T/C W/ M. WARNER AND J. ALBERTO RE 5.27 HEARING	0.40	800.00	320.00
05/26/20	JRA	T/C WITH M. WARNER AND S. VAN AALTEN RE TOMORROW'S HEARING	0.70	625.00	437.50
05/26/20	MDW	CALL WITH CO-COUNSEL RE HEARING PROCESSES AND STRATEGIES.	0.90	840.00	756.00
05/27/20	SVA	ATTENDED HEARING ON RENT SUSPENSION MOTION	0.50	800.00	400.00
05/27/20	SVA	PREPARATION FOR HEARING ON RENT SUSPENSION MOTION	0.30	800.00	240.00
05/27/20	SYC	PREPARE FOR AND ATTEND HEARING ON 365(D)(3) MOTION	0.60	650.00	390.00
05/27/20	MDW	E-MAIL TO PROFESSIONALS RE PREP FOR TODAY'S HEARINGS, AND RELATED PROCEDURES.	0.20	840.00	168.00
05/27/20	MDW	ATTENDANCE TELEPHONICALLY AT TODAY'S HEARINGS RE LANDLORD ISSUES.	0.50	840.00	420.00
06/05/20	GDD	PREPARE FOR HEARING ON CASH COLLATERAL OBJECTION	2.60	600.00	1,560.00
06/07/20	GDD	BEGIN TO PREPARE FOR HEARING ON CASH COLLATERAL OBJECTION	3.10	600.00	1,860.00
06/07/20	GDD	REVIEW/ANALYSIS OF PROPOSED EXHIBITS FOR CASH COLLATERAL HEARING AND RELATED POTENTIAL EXHIBITS RE: SAME	2.70	600.00	1,620.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
06/10/20	BLW	ATTEND HEARING RE: INTER ALIA, CASH COLLATERAL.	1.10	350.00	385.00
06/10/20	SYC	PREPARATION FOR (2.5) AND ATTENDANCE AT (1.4) CASH COLLATERAL HEARING	3.90	650.00	2,535.00
06/10/20	SVA	ATTENDED CASH COLLATERAL HEARING	0.80	800.00	640.00
06/17/20	SYC	EMAILS/CALLS WITH COOLEY RE: 6/18 HEARING AND CALL WITH SVA RE SAME	0.50	650.00	325.00
06/18/20	SVA	PREPARATION FOR BAR DATE AND KEIP HEARING	0.60	800.00	480.00
06/18/20	SYC	ATTEND HEARING ON KEIP AND BAR DATE MOTION	0.50	650.00	325.00
06/18/20	SVA	KEIP AND BAR DATE HEARING	0.70	800.00	560.00
06/30/20	SVA	DISCLOSURE STATEMENT HEARING	1.10	800.00	880.00
06/30/20	SVA	PREPARATION FOR DS HEARING	0.60	800.00	480.00

COMMITTEE MATTERS AND CREDITOR MEETINGS**24.50****16,981.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/22/20	SVA	CORRES W/ NIKE RE CASE STRATEGY	0.30	800.00	240.00
05/22/20	MDW	COMMUNICATION WITH UST RE COMMITTEE SELECTION OF PROFESSIONALS.	0.20	840.00	168.00
05/22/20	SVA	CORRES W/ ENCHANTE ACCESSORIES RE CASE STRATEGY	0.40	800.00	320.00
05/22/20	SVA	REVIEW/COMMENT ON DEBTOR NDA	0.70	800.00	560.00
05/22/20	SVA	FA INTERVIEWS AND SELECTION	0.80	800.00	640.00
05/22/20	JRA	PARTICIPATE IN INITIAL UCC CALL WITH J. INDYKE, S. VAN AALTEN AND COMMITTEE MEMBERS RE SELECTION OF FINANCIAL ADVISORS	0.90	625.00	562.50
05/22/20	JRA	CORRESPOND WITH S. VAN AALTEN AND S. CARNES RE NOA, BYLAWS AND OTHER PRELIMINARY MATTERS	0.60	625.00	375.00
05/22/20	SYC	ATTEND CALL RE: FA APPOINTMENT (.7); ATTENTION TO FIRST DAY MATTERS (.6); EMAILS WITH COOLEY RE: SAME (.3)	1.60	650.00	1,040.00
05/22/20	JRA	FURTHER EMAILS WITH S. CARNES RE BYLAWS	0.10	625.00	62.50
05/22/20	JRA	INITIAL PROFESSIONALS CALL RE IMMEDIATE ACTION ITEMS WITH J. INDYKE, D. DACHELET AND S. VAN AALTEN	0.40	625.00	250.00
05/23/20	SVA	REVIEW/COMMENT ON PROPOSED NDA	0.60	800.00	480.00
05/23/20	JRA	EMAILS WITH D. DACHELET, S. VAN AALTEN AND J. INDYKE RE BYLAWS AND NDA	0.30	625.00	187.50
05/23/20	JRA	REVIEW UCC NDA	0.30	625.00	187.50

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/23/20	SYC	DRAFT BYLAWS AND EMAIL TO UCC RE: SAME (.9); REVIEW OF LOCAL RULES AND FIRST DAY PLEADINGS AND CASE BACKGROUND MATERIALS (.8); REVIEW CONTACT LIST AND CALLS AND EMAILS WITH SVA RE: ADMIN (.3)	2.00	650.00	1,300.00
05/24/20	JRA	FURTHER EMAILS WITH M. ROBINSON, S. VAN AALTEN AND P. HUYGENS RE DILIGENCE REQUESTS	0.30	625.00	187.50
05/28/20	SYC	FOLLOW-UP EMAILS TO COMMITTEE RE: BYLAWS AND NDA	0.70	650.00	455.00
05/28/20	SYC	STRATEGY CALL WITH COOLEY AND PROVINCE	1.00	650.00	650.00
05/30/20	SVA	REVIEWED REVISED NDA	0.20	800.00	160.00
05/31/20	JRA	EMAILS WITH J. INDYKE AND COMMITTEE MEMBERS RE UCC CALL	0.20	625.00	125.00
06/02/20	SYC	PREPARE FOR AND ATTEND PROFESSIONALS ONLY PRE-UCC CALL	0.50	650.00	325.00
06/02/20	SVA	PREPARATION FOR UCC CALL RE CASH COLLATERAL OBJECTION	0.40	800.00	320.00
06/02/20	SVA	REVIEWED PROVINCE UCC DECK FOR CALL	0.40	800.00	320.00
06/02/20	SVA	UCC UPDATE CALL RE CASH COLLATERAL AND SALE PROCESS	0.80	800.00	640.00
06/02/20	MDW	REVIEW AGENDA, AND PARTICPATE IN COMMITTEE CALL.	0.90	840.00	756.00
06/02/20	SYC	PREPARE FOR AND ATTEND UCC CALL	1.00	650.00	650.00
06/03/20	MDW	INTERNAL TEXAS TEAM DISCUSSION ON COMING EVENTS, AND DRAFT PROTOCOL TO PROVIDE TO ALL PROFESSIONALS RE JUDGE JONES ISSUES.	1.50	840.00	1,260.00
06/10/20	MDW	REVIEW RECENTLY FILED PLEADINGS AND ADDRESS ISSUES WITH CO-COUNSEL.	1.10	840.00	924.00
06/12/20	SVA	CORRES W/ INDYKE RE UCC MEETING AND KEIP	0.20	800.00	160.00
06/15/20	SKN	SIT IN ON CREDITORS MEETING AND TAKE NOTES	0.30	325.00	97.50
06/15/20	SYC	STAGE STORES PROFESSIONALS CALL	0.60	650.00	390.00
06/15/20	AZG	CONFERENCE CALL ON STATUS OF THE CASE.	0.40	290.00	116.00
06/15/20	SYC	CALL RE: ABL INVESTIGATION	0.40	650.00	260.00
06/16/20	SVA	REVIEW/COMMENT ON PROVINCE DECK FOR 6.17 UCC UPDATE CALL	0.70	800.00	560.00
06/16/20	SYC	EMAIL TO COMMITTEE RE: PENDING MATTERS, HEARING NIKE SETTLEMENT, AND 6/17 MGMT MEETING	0.90	650.00	585.00
06/17/20	SYC	PREPARE FOR AND ATTEND COMMITTEE CALL	1.10	650.00	715.00
06/17/20	SVA	UCC UPDATE CALL RE SALE PROCESS, KEIP, PJS RETENTION AND PLAN UPDATE	0.90	800.00	720.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
06/19/20	AZG	DRAFT COMMITTEE EMAIL REGARDING BAR DATE ORDER.	0.80	290.00	232.00

LEASES (REAL PROPERTY)			3.70		2,435.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/23/20	JRA	ANALYZE REJECTION PROCEDURES MOTION AND ATTENDANT PROCEDURES	0.60	625.00	375.00
05/23/20	JRA	ANALYZE 365(D)(3) MOTION (.4) AND RESEARCH REGARDING RECENT CASE PRECEDENT (.5)	0.90	625.00	562.50
05/24/20	SVA	REVIEWED PROPOSED ORDER RE RENT EXTENSIONS	0.30	800.00	240.00
05/24/20	JRA	REVIEW STORE CLOSING/WIND DOWN MOTION AND ORDER	1.50	625.00	937.50
06/15/20	SVA	CORRES W/ H. EHRLICH RE LEASE REJECTION NOTICE	0.40	800.00	320.00

REORGANIZATION PLAN			15.60		11,867.50
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/23/20	SVA	REVIEW/COMMENT ON PLAN AND DISCLOSURE STATEMENT	2.60	800.00	2,080.00
05/25/20	JRA	ANALYZE PLAN AND DS AS FILED	1.70	625.00	1,062.50
05/26/20	SYC	REVIEW OF DRAFT PLAN AND DISCLOSURE STATEMENT	1.40	650.00	910.00
06/12/20	SVA	REVIEW/COMMENT ON PLAN AND DISCLOSURE STATEMENT	2.10	800.00	1,680.00
06/15/20	SVA	T/C W/ PROVINCE AND COOLEY RE PLAN AND SALE PROCESS	0.60	800.00	480.00
06/15/20	SVA	T/C W/ BROOKFIELD COUNSEL RE DISCLOSURE STATEMENT ISSUES	0.40	800.00	320.00
06/16/20	SYC	EMAILS WITH COOLEY RE: DISCLOSURE STATEMENT	0.50	650.00	325.00
06/17/20	SVA	CORRES W/ DEBTORS AND WAGE AND HOUR CLASS COUNSEL RE PLAN TREATMENT	0.60	800.00	480.00
06/17/20	SVA	CORRES W/ UCC MEMBERS RE PLAN NEGOTIATIONS	0.70	800.00	560.00
06/21/20	SVA	REVIEWED DEBTOR RESPONSES TO UCC PLAN/DS COMMENTS	0.60	800.00	480.00
06/26/20	BLW	ADDRESS ISSUES RE: DS OBJECTION AND FILING OF SAME.	0.20	350.00	70.00
06/26/20	SVA	REVIEWED EXHIBIT LIST FOR DS HEARING	0.30	800.00	240.00
06/27/20	SVA	REVIEWED REVISED PLAN AND DS	1.40	800.00	1,120.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
06/29/20	SVA	CORRES W/ CARNES AND INDYKE RE PREPARATION FOR DISCLOSURE STATEMENT HEARING	0.30	800.00	240.00
06/30/20	SVA	REVIEWED AMENDED PLAN AND DS	0.70	800.00	560.00
06/30/20	MDW	REVIEW INTERNAL COMMITTEE MEMO RE DS ISSUES; AND PARTICIPATE IN TELEPHONIC HEARING ON DEBTORS' DS.	1.50	840.00	1,260.00

DISCLOSURE STATEMENT/VOTING ISSUES **3.90** **2,720.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
06/23/20	SVA	REVIEW/COMMENT ON UCC STATEMENT IN RESPONSE TO DS APPROVAL MOTION	0.60	800.00	480.00
06/26/20	MDW	REVIEW AND PROVIDE COMMENTS TO DRAFT OBJECTION TO DS.	0.50	840.00	420.00
06/26/20	SYC	REVIEW DRAFT COOLEY DS OBJECTION AND EMAILS RE: SAME	0.70	650.00	455.00
06/27/20	SYC	BRIEF REVIEW OF REVISED DS	0.50	650.00	325.00
06/29/20	SYC	REVIEW EMAILS RE: DS NEGOTIATIONS AND EMAILS RE: SAME	0.70	650.00	455.00
06/30/20	SYC	ATTEND DS HEARING AND EMAILS RE: SAME	0.90	650.00	585.00

LITIGATION/ GEN. (EXCEPT AUTOMATIC STAY RELIEF) **2.40** **1,635.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
06/08/20	SKN	REVIEW AND REVISE MOTION TO SEAL	0.60	325.00	195.00
06/23/20	SVA	CORRES W/ DEBTORS RE UCC CLAIM INVESTIGATION	0.80	800.00	640.00
06/24/20	SVA	T/C W/ SUSSBERG AND INDYKE RE CLAIMS INVESTIGATION	0.40	800.00	320.00
06/24/20	SVA	MULT CORRES W/ SUSSBERG AND INDYKE RE CLAIMS INVESTIGATION	0.60	800.00	480.00

EMPLOYEE MATTERS **4.90** **3,495.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/23/20	JRA	BRIEFLY ANALYZE WAGES MOTION (.2) AND RESEARCH RE PAYMENTS UNDER SAME (.3)	0.50	625.00	312.50
05/28/20	SYC	REVIEW KEIP/KERP MOTION	1.40	650.00	910.00
05/29/20	SVA	REVIEWED PROVINCE KEIP ANALYSIS	0.60	800.00	480.00
05/30/20	SYC	REVIEW OF PROVINCE MATERIALS RE: KEIP/KERP	0.40	650.00	260.00
06/04/20	MDW	CALL WITH UST RE KERP/KEIP.	0.20	840.00	168.00
06/05/20	SYC	REVIEW KEIP ISSUES LIST FROM COOLEY	0.20	650.00	130.00
06/12/20	SVA	REVIEW/COMMENT ON KEIP TERM SHEET	0.60	800.00	480.00
06/16/20	SYC	EMAILS WITH COOLEY ON KEIP REVISIONS	0.30	650.00	195.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
06/17/20	SVA	REVIEW/COMMENT ON KEIP TERM SHEET	0.40	800.00	320.00
06/17/20	SVA	REVIEWED REVISED KERP ORDER	0.30	800.00	240.00

FEE APPLICATION MATTERS/OBJECTIONS **0.30** **240.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/24/20	SVA	REVIEW/COMMENT ON INTERIM COMP PROCEDURES MOTION	0.30	800.00	240.00

BANK CLAIMS AND LITIGATION MATTERS **1.70** **1,360.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/26/20	SVA	REVIEW/COMMENT ON NOA AND PRO HAC	0.40	800.00	320.00
06/15/20	SVA	CORRES W/ DEAN AND CARNES RE ABL LIEN INVESTIGATION	0.60	800.00	480.00
06/15/20	SVA	REVIEWED DOCUMENT PRODUCTION FROM ABL LENDERS	0.70	800.00	560.00

GENERAL CORPORATE ADVICE **1.10** **687.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/23/20	JRA	ANALYZE FIRST DAY INSURANCE MOTION	0.40	625.00	250.00
05/23/20	JRA	ANALYZE NOL MOTION AND ORDER	0.70	625.00	437.50

ASSUMPTION AND REJECTIONS OF LEASES AND CONTRACTS **1.40** **910.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/24/20	SYC	EMAILS AND RE: FIRST DAY ADMIN AND 365(D)(3) RELIEF	1.40	650.00	910.00

BUSINESS OPERATIONS **0.90** **585.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
05/25/20	SYC	REVIEW CASH MGMT MOTION	0.90	650.00	585.00

TOTAL HOURS 458.70

PROFESSIONAL SERVICES: \$293,832.50

TIMEKEEPER SUMMARY

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Alberto, Justin	Member	16.60	625.00	10,375.00
Benjamin L. Wallen	Associate	2.60	350.00	910.00
Carnes, Sarah A.	Associate	166.70	650.00	108,355.00
Frances Pisano	Paralegal	1.50	305.00	457.50

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<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
G. David Dean	Member	72.80	600.00	43,680.00
Garrastegui, Adam	Associate	36.00	290.00	10,440.00
Irving E. Walker	Member	3.70	675.00	2,497.50
Kerri L. LaBrada	Paralegal	6.30	265.00	1,669.50
Kim McEllen	Paralegal	5.30	290.00	1,537.00
Michael D. Warner	Member	23.50	840.00	19,740.00
Nace, Shelby	Associate	3.70	325.00	1,202.50
Roger M. Iorio	Member	3.90	670.00	2,613.00
Suhailah S. Sallie	Paralegal	5.10	305.00	1,555.50
Van Aalten, Seth	Member	111.00	800.00	88,800.00
		Total	458.70	\$293,832.50

COST DETAIL

<u>DATE</u>	<u>Description</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
05/26/20	CONFERENCE CALL	115.00	5.75
05/29/20	ONLINE RESEARCH	25.00	2.50
05/29/20	ONLINE RESEARCH	1.00	0.10
05/29/20	ONLINE RESEARCH	1.00	0.10
06/03/20	CONFERENCE CALL	492.00	25.14
06/19/20	PHOTOCOPY /PRINTING/SCANNING	28.00	5.60
		Total	\$39.19

TOTAL SERVICES AND COSTS:

\$ 293,871.69

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
Stage Stores, Inc., <i>et al.</i>)	Chapter 11
Debtors. ¹)	Case No. 20-32564 (DRJ)
)	(Jointly Administered)

**SECOND MONTHLY FEE STATEMENT OF COLE SCHOTZ P.C. FOR
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF
EXPENSES AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR THE PERIOD FROM
JULY 1, 2020 THROUGH JULY 31, 2020**

Pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* entered by the Court on June 10, 2020 (the “Interim Compensation Order”) [Docket No. 437], Cole Schotz P.C. (“Cole Schotz”), co-counsel for the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), submits this monthly statement (this “Statement”) of services rendered and expenses incurred in these cases for the period from July 1, 2020 through July 31, 2020 (the “Statement Period”).

I. Itemization of Services Rendered by Cole Schotz

A. The following is a list of individuals and their respective titles that provided services during the Statement Period. It includes information regarding their respective billing rates and the total number of hours spent by each individual providing services during the Statement Period for which Cole Schotz seeks compensation.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900). The Debtors’ service address is: 2425 West Loop South, Houston, Texas 77027.



SUMMARY

Name	Position / Dept.	State of Bar Admission / Year	Hours	Hourly Rate²	Total Compensation
Michael D. Warner	Member/ Bankruptcy & Restructuring	California, 1984	4.50	\$840	\$3,780.00
Seth Van Aalten	Member/ Bankruptcy & Restructuring	New York, 2004	32.70	\$800	\$26,160.00
Irving E. Walker	Member/ Bankruptcy & Restructuring	Maryland, 1978	16.90	\$675	\$11,407.50
Roger M. Iorio	Member/ Corporate	New Jersey, 2002	27.50	\$670	\$18,425.00
G. David Dean	Member/ Bankruptcy & Restructuring	Delaware 2017, D.C. 2003, Maryland, 2002	51.50	\$600	\$30,900.00
Sarah A. Carnes	Associate/ Bankruptcy & Restructuring	New York, 2015	23.30	\$650	\$15,145.00
Benjamin L. Wallen	Associate/ Bankruptcy & Restructuring	Texas, 2016	0.20	\$350	\$70.00
Adam Garrastegui	Associate/ Bankruptcy & Restructuring	New Jersey, 2019	42.20	\$290	\$12,238.00
H.C. Jones	Associate/ Bankruptcy & Restructuring	Maryland, 2016	23.20	\$375	\$8,700.00
Shelby K. Nace	Associate/ Bankruptcy & Restructuring	New York, 2019	2.10	\$325	\$682.50
Kerri L. LaBrada	Paralegal	n/a	2.10	\$265	\$682.50
Frances Pisano	Paralegal	n/a	0.40	\$305	\$122.00
Kim McEllen	Paralegal	n/a	0.30	\$290	\$87.00
Roseanne Cohen	Paralegal	n/a	0.60	\$310	\$186.00
Total			277.50	\$6,745.00	\$128,459.50

² This rate is Cole Schotz's regular hourly rate for legal services. All hourly rates are adjusted by Cole Schotz on a periodic basis. The last adjustment occurred on October 1, 2019.

B. The time records of Cole Schotz consisting of a daily breakdown of the time spent by each person on each day, and detail as to the disbursements incurred are attached as **Exhibit A** to this Statement.

II. Itemization of Services Rendered and Disbursements Incurred by Category

The following itemization presents the services rendered by Cole Schotz by task category and provides a summary of disbursements incurred by category of disbursement.

1. Services Rendered

The following services were rendered in the following task category:

Task Category	Hours	Fees Earned
Asset Disposition	6.50	\$5,050.00
Asset Acquisitions/Business Combinations	1.50	\$1,200.00
Business Operations	.50	\$325.00
Case Administration	5.80	\$2,425.50
Claims Administration and Objections	2.90	\$2,260.00
Fee Applications/Objections	14.50	\$9,097.50
Financing and Cash Collateral	1.10	\$880.00
Leases (Real Property)	1.10	\$601.00
Litigation	174.10	\$92,408.50
Creditor Inquires	3.70	\$2,652.00
Meetings and Communications with Creditors	2.20	\$1,490.00
Reorganization Plan	8.40	\$6,315.00
Preferences and Avoidance Actions	1.00	\$800.00
Reports; Statements and Schedules	.40	\$320.00
Disclosure Statement/Voting Issues	.60	\$390.00
Preparation and Hearings Attendance	1.30	\$980.00
Retention Matters	1.90	\$1,265.00
TOTAL	227.50	\$128,459.50

A detailed itemization of the services rendered in each of the above task categories is set forth in **Exhibit A**.

2. Disbursements Incurred

The disbursements incurred by Cole Schotz for this Statement are as follows:

Expense Category	Total Expenses
Conference Call	\$6.20
Photocopy	\$14.80

Expense Category	Total Expenses
Online Research	\$161.80
Total	\$182.80

3. Total Amount Payable

Accordingly, the amount of compensation and expenses payable for this Statement Period is **\$102,950.40**, which is calculated as follows:

Total Fees for Services Rendered During Statement Period	\$128,459.50
Twenty Percent (20%) Holdback	\$25,691.90
Fees Minus Holdback	\$102,767.60
Costs (100%)	\$182.80
TOTAL	\$102,950.40

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WHEREFORE, pursuant to the Interim Compensation Order, Cole Schotz requests payment of (i) compensation in the amount of \$102,767.60 (80% of \$128,459.50) on account of actual, reasonable and necessary professional services rendered to the Committee by Cole Schotz and (ii) reimbursement of actual and necessary costs and expenses in the amount of \$182.80 incurred on behalf of the Committee by Cole Schotz.

Dated: August 21, 2020

Respectfully submitted,

/s/ Michael D. Warner

Michael D. Warner (TX Bar No. 00792304)

COLE SCHOTZ P.C.

301 Commerce Street, Suite 1700

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(817) 810-5250

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- and -

Seth Van Aalten, Esq. (admitted *pro hac vice*)

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COLE SCHOTZ P.C.

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*Co-Counsel to the Official Committee of
Unsecured Creditors*

EXHIBIT A

OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF STAGE STORES, INC.
ET AL.
NIKE USA, INC.
NOEL RUNGE, DIRECTOR OF CREDIT & RISK
ONE BOWERMAN DRIVE
BEAVERTON, OH 97005

Invoice Date: August 9, 2020
Invoice Number: 868232
Matter Number: 61201-0001

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS

FOR PROFESSIONAL SERVICES THROUGH JULY 31, 2020

FEE APPLICATION MATTERS/OBJECTIONS			14.50	9,097.50	
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/02/20	KLL	CIRCULATE MONTHLY FEE STATEMENT APPLICATION TO CO-COUNSEL	0.20	265.00	53.00
07/02/20	SYC	EMAILS RE: INITIAL FEE APPLICATIONS	0.50	650.00	325.00
07/03/20	SVA	REVIEW/REVISE JUNE BILL	0.70	800.00	560.00
07/06/20	SYC	EMAILS RE: FEE APPLICATIONS	0.20	650.00	130.00
07/06/20	SVA	CORRES W/ CARNES RE PREPARATION OF FIRST MONTHLY FEE STATEMENT	0.20	800.00	160.00
07/07/20	SYC	EMAILS RE: FEE APP	0.30	650.00	195.00
07/07/20	SVA	CORRES W/ DEBTORS AND LENDERS RE PJS REVISED COMPENSATION STRUCTURE	0.30	800.00	240.00
07/09/20	SYC	EMAILS RE: FEE APPLICATION	0.30	650.00	195.00
07/09/20	SVA	FURTHER REVIEW OF STAGE STORES BILL	0.40	800.00	320.00
07/09/20	SVA	CORRES W/ CARNES RE MONTHLY FEE APPLICATION	0.20	800.00	160.00
07/10/20	SYC	REVIEW DRAFT BILL AND EMAILS RE: SAME	0.50	650.00	325.00
07/13/20	SKN	REVIEW INVOICE FOR FEE APPLICATION	0.30	325.00	97.50
07/15/20	SVA	CORRES W/ LABRADA AND WARNER RE FIRST MONTHLY FEE APPLICATIONS	0.20	800.00	160.00
07/15/20	SYC	EMAILS TO PROVINCE AND SVA RE: FEE APPLICATION FILING	0.20	650.00	130.00
07/15/20	KLL	REVIEW COOLEY MONTHLY FEE STATEMENT AND PROVIDE COMMENTS ON SAME	0.20	265.00	53.00
07/15/20	MDW	ADDRESS COOLEY FIRST INTERIM FEE REPORT.	0.50	840.00	420.00
07/15/20	SYC	REVIEW COOLEY FIRST MFA AND PROVIDE COMMENTS TO SAME	0.50	650.00	325.00
07/16/20	SKN	DRAFT AND REVISE FEE APPLICATION	1.80	325.00	585.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/16/20	SYC	REVIEW 1ST MFA (.6); PROVIDE COMMENTS TO SAME (.5); AND CALL WITH S. NACE RE: SAME (2.)	1.30	650.00	845.00
07/17/20	SVA	REVIEW/COMMENT ON REVISED UCC PROFESSIONALS FIRST MONTHLY FEE STATEMENTS	0.60	800.00	480.00
07/17/20	SYC	REVISE COOLEY AND PROVINCE FEE APPLICATIONS AND EMAILS RE: SAME	1.00	650.00	650.00
07/20/20	MDW	REVIEW AND PROVIDE COMMENTS RE INTERIM FEE APPLICATION OF PROFESSIONALS.	1.30	840.00	1,092.00
07/21/20	MDW	FINAL REVIEW OF PROFESSIONAL FEE APLNS OF COMMITTEE PRIOR TO FILING.	1.10	840.00	924.00
07/21/20	SVA	CORRES W/ COOLEY AND PROVINCE RE MONTHLY FEE APP FILINGS	0.20	800.00	160.00
07/21/20	KLL	FINALIZE AND FILE COOLEY MONTHLY FEE STATEMENT	0.40	265.00	106.00
07/21/20	SYC	EMAILS RE: SECOND MONTHLY FEE APPS	0.30	650.00	195.00
07/21/20	KLL	FINALIZE AND FILE CS MONTHLY FEE STATEMENT	0.40	265.00	106.00
07/21/20	KLL	FINALIZE AND FILE PROVINCE MONTHLY FEE STATEMENT	0.40	265.00	106.00

LITIGATION/ GEN. (EXCEPT AUTOMATIC STAY RELIEF) 174.10 92,408.50

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/01/20	GDD	REVIEW FEE LETTERS AND RELATED LOAN DOCUMENTS RE: FEES	1.40	600.00	840.00
07/01/20	GDD	RESEARCH RE: FRAUDULENT TRANSFER ISSUES	2.10	600.00	1,260.00
07/01/20	IEW	REVIEW LOAN OOCUMENTS AS PART OF LIEN REVIEW PROCESS FOR POTENTIAL CHALLENGES	0.60	675.00	405.00
07/01/20	IEW	CALL WITH D. DEAN TO REVIEW ISSUES FOR REVIEW OF LENDERS' LIENS AND CLAIMS (.6); EMAILS WITH D. DEAN REGARDING POINTS FOR PROVINCE TO REVIEW TO ASSIST IN OUR LIEN AND CLAIMS REVIEW ANALYSIS (.1)	0.70	675.00	472.50
07/01/20	RMI	REVIEW LOAN DOCUMENTS	1.30	670.00	871.00
07/01/20	RMI	REVIEW LIEN SEARCH RESULTS	1.80	670.00	1,206.00
07/01/20	GDD	CALL WITH I. WALKER RE: LENDER AVOIDANCE ISSUES	0.60	600.00	360.00
07/02/20	GDD	CALL WITH S. VAN AALTEN RE: LIEN REVIEW ANALYSIS	0.40	600.00	240.00

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Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS
Client/Matter No. 61201-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/02/20	IEW	CALL WITH M. ROBINSON OF PROVINCE TO DISCUSS INVESTIGATION OF LENDER CLAIMS (.3); EMAIL TO D. DEAN AND FILE REGARDING SAME (.2)	0.50	675.00	337.50
07/02/20	GDD	CALL WITH I. WALKER RE: LIEN REVIEW ISSUES	0.30	600.00	180.00
07/02/20	GDD	REVIEW DOCUMENTS RE: LIEN AVOIDANCE AND REVIEW ISSUES	2.30	600.00	1,380.00
07/02/20	AZG	CALL WITH IRVING TO DISCUSS RESEARCH ON SECTION 548 IN THE 5TH CIRCUIT.	0.30	290.00	87.00
07/02/20	IEW	REVIEW LOAN DOCUMENTS AND OTHER MATERIALS FOR LIEN AND CLAIM ANALYSIS TO DETERMINE ANY GROUNDS FOR COMMITTEE CHALLENGE	1.60	675.00	1,080.00
07/03/20	GDD	REVIEW/ANALYSIS OF DOCUMENTS RE: LIEN REVIEW ISSUES	2.30	600.00	1,380.00
07/04/20	GDD	REVIEW RESEARCH AND ANALYSIS RE: POTENTIAL LIEN AVOIDANCE ISSUES	1.60	600.00	960.00
07/04/20	GDD	REVIEW/ANALYSIS OF DOCUMENTS AND FINANCIAL ISSUES RE: LIEN INVESTIGATION AND POTENTIAL AVOIDANCE ISSUES	2.50	600.00	1,500.00
07/05/20	GDD	RESEARCH AND REVIEW OF DOCUMENTS RE: POTENTIAL LIEN AVOIDANCE AND CHALLENGE ISSUES	2.80	600.00	1,680.00
07/06/20	RMI	REVIEW LOAN DOCUMENTS AND LIEN RESULTS	3.30	670.00	2,211.00
07/06/20	AZG	RESEARCHED FRAUDULENCE CONVEYANCE LAW AND DRAFTED MEMO TO THE COMMITTEE.	8.20	290.00	2,378.00
07/06/20	GDD	REVIEW/ANALYSIS OF DOCUMENTS AND RESEARCH RE: LIEN REVIEW ISSUES	2.10	600.00	1,260.00
07/06/20	SYC	EMAILS AND CALLS RE: LIEN REVIEW	0.50	650.00	325.00
07/07/20	AZG	RESEARCHED FRAUDULENT CONVEYANCE LAW AND DRAFTED MEMO TO COMMITTEE.	6.90	290.00	2,001.00
07/07/20	GDD	MEMO RE: LIEN INVESTIGATION ISSUES	2.20	600.00	1,320.00
07/07/20	GDD	REVIEW RESEARCH AND DOCUMENTS RE: POTENTIAL AVOIDANCE ISSUES	2.30	600.00	1,380.00
07/07/20	RMI	REVIEW LOAN DOCUMENTS AND LIEN SEARCH RESULTS	2.80	670.00	1,876.00
07/07/20	KM	UPDATE/FINALIZE MEMO IN CONNECTION WITH LIEN SEARCHES	0.30	290.00	87.00
07/08/20	AZG	RESEARCH REGARDING EXCESSIVE LENDER FEES AS A FRAUDULENT CONVEYANCE.	1.60	290.00	464.00
07/08/20	SVA	REVIEWED BUDGET UPDATE FROM PROVINCE	0.40	800.00	320.00
07/08/20	GDD	REVIEW/ANALYSIS OF RESEARCH AND DOCUMENTS RE: LIEN AVOIDANCE ISSUES	3.50	600.00	2,100.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/08/20	RMI	WORK ON DRAFT LIEN REVIEW AND ANALYSIS MEMO	4.20	670.00	2,814.00
07/08/20	IEW	REVIEW RESEARCH REGARDING POTENTIAL AVOIDANCE CLAIMS	1.10	675.00	742.50
07/08/20	AZG	REVISED MEMO REGARDING FRAUDULENT CONVEYANCE.	1.20	290.00	348.00
07/09/20	RC	RECEIPT AND REVIEW OF WEST VIRGINIA AND TEXAS MORTGAGES; EMAIL TOWN TITLE ORDERING SEARCHES FOR DISCHARGES OF MORTGAGES.	0.10	310.00	31.00
07/09/20	GDD	REVIEW/ANALYSIS OF SCHEDULES, SOFAS AND RELATED PLEADINGS RE: LENDER LIENS AND POTENTIAL AVOIDANCE CLAIMS	2.10	600.00	1,260.00
07/09/20	IEW	CONFERENCE CALL WITH D. DEAN AND PAUL H. REGARDING ANALYSIS OF ISSUES FOR REPORT TO COMMITTEE ON POTENTIAL CHALLENGES TO LENDERS' CLAIMS	0.60	675.00	405.00
07/09/20	SYC	REVIEW OF MORTGAGES AND FORBEARANCE AGREEMENT (.9); DRAFT WRITE-UP RE: SAME (1)	1.90	650.00	1,235.00
07/09/20	GDD	CALL WITH S. VAN AALTEN RE: LIEN INVESTIGATION AND POTENTIAL STIPULATION ISSUES	0.20	600.00	120.00
07/09/20	IEW	DRAFT MEMORANDUM TO COMMITTEE ON POTENTIAL CLAIMS TO CHALLENGE LENDER LIENS AND CLAIMS	3.30	675.00	2,227.50
07/09/20	GDD	CALL WITH I. WALKER RE: LIEN INVESTIGATION	0.20	600.00	120.00
07/09/20	IEW	CONFERENCE CALL WITH PAUL H. AND DAVID D. REGARDING ANALYSIS OF DEBTORS' FINANCIAL CONDITION PREBANKRUPTCY RELATING TO POTENTIAL CHALLENGE TO LENDERS' CLAIMS AND LIENS	0.60	675.00	405.00
07/09/20	GDD	FOLLOW UP WITH I. WALKER RE: LIEN INVESTIGATION	0.30	600.00	180.00
07/09/20	HCJ	DRAFT MEMO FOR CREDITORS' COMMITTEE CONCERNING POTENTIAL OBJECTION TO SECURED LENDERS' CLAIMS	1.60	375.00	600.00
07/09/20	IEW	WORK ON ANALYSIS OF ABILITY TO CHALLENGE LENDER FEES, INCLUDING REVIEW OF CASE LAW (.6); CONFER WITH D. DEAN REGARDING REPORT TO COMMITTEE AND INFORMATION NEEDED FROM FINANCIAL ADVISOR (.4); CONFER WITH HC JONES ON LEGAL RESEARCH FOR ANALYSIS (.2);	1.20	675.00	810.00
07/09/20	GDD	REVIEW DOCUMENTS, RESEARCH AND DRAFT MEMO RE: LIEN INVESTIGATION ISSUES	2.40	600.00	1,440.00

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Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/09/20	GDD	CALL WITH I. WALKER AND P. HUYGENS RE: AVOIDANCE AND VALUATION ISSUES	0.60	600.00	360.00
07/09/20	HCJ	RESEARCH RE: SECURED LENDER FEES AS FRAUDULENT OBLIGATION INCURRED	7.30	375.00	2,737.50
07/09/20	SVA	T/C W/ DEAN RE ABL LIEN INVESTIGATION STATUS	0.40	800.00	320.00
07/09/20	HCJ	CALL WITH I.WALKER RE: CHALLENGING LENDER'S FEES AS FRAUDULENT INCURRENCE OF DEBT	0.50	375.00	187.50
07/09/20	HCJ	DRAFT EMAIL TO I.WALKER RE: ANALYSIS OF POTENTIAL CLAIM OBJECTION	0.40	375.00	150.00
07/09/20	RMI	WORK ON COMMITTEE MEMO RE: LIEN ANALYSIS	4.10	670.00	2,747.00
07/10/20	RMI	WORK ON LIEN REVIEW AND ANALYSIS MEMO TO CREDITORS COMMITTEE	6.80	670.00	4,556.00
07/10/20	HCJ	RESEARCH/DRAFT AND REVISE MEMO RE: EXCESSIVE FORBEARANCE FEES AS CONSTRUCTIVELY FRAUDULENT TRANSFERS	4.70	375.00	1,762.50
07/10/20	HCJ	CALL WITH I.WALKER RE: POTENTIAL FRAUDULENT TRANSFER CLAIMS	0.20	375.00	75.00
07/10/20	HCJ	DRAFT EMAIL TO I.WALKER RE: RESEARCH RESULTS	0.30	375.00	112.50
07/10/20	IEW	DRAFT REPORT TO COMMITTEE ON POTENTIAL CHALLENGES TO LENDER CLAIMS	3.80	675.00	2,565.00
07/10/20	AZG	CORRESPONDENCE REGARDING COMMITTEE MEMO AND OBTAINING FURTHER DOCUMENTATION FROM LENDERS.	0.90	290.00	261.00
07/10/20	SVA	T/C W/ J. ALTMAN RE ABL LIEN INVESTIGATION	0.40	800.00	320.00
07/10/20	GDD	REVIEW/ANALYSIS OF DOCUMENTS RE: LENDERS' LIENS	2.80	600.00	1,680.00
07/10/20	SYC	EMAILS RE: WELLS CREDIT DOCS	0.60	650.00	390.00
07/10/20	SVA	T/C W/ J. INDYKE RE ABL LIEN INVESTIGATION	0.40	800.00	320.00
07/10/20	GDD	CALL WITH I. WALKER RE: LIEN AVOIDANCE ISSUES	0.30	600.00	180.00
07/11/20	GDD	WORK ON LIEN MEMO AND REVIEW OF DOCUMENTS RE: SAME	3.20	600.00	1,920.00
07/11/20	GDD	WORK ON MEMO RE: CLAIMS AGAINST LENDERS AND REVIEW OF RESEARCH RE: SAME	1.80	600.00	1,080.00
07/11/20	IEW	REVIEW DRAFT LIEN REPORT (.2); DRAFT REPORT ON POTENTIAL CHALLENGES TO LENDERS' CLAIMS AND LIENS (1.7)	1.90	675.00	1,282.50
07/12/20	GDD	CONTINUE TO WORK ON LIEN MEMO AND REVIEW/ALYSIS OF DOCUMENTES RE: SAME	3.10	600.00	1,860.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/12/20	GDD	CONTINUE TO WORK ON ANALYSIS OF POTENTIAL CLAIMS AGAINST LENDERS IN LIEN INVESTIGATION	2.10	600.00	1,260.00
07/13/20	GDD	CALL WITH I. WALKER RE: LIEN REVIEW ISSUES	0.30	600.00	180.00
07/13/20	IEW	CONFERENCE CALL WITH D. DEAN AND PROVINCE REGARDING SOLVENCY ANALYSIS (.3); COMPLETE MEMORANDUM TO COMMITTEE ANALYZING POTENTIAL AVOIDANCE ACTIONS AGAINST LENDERS (.5)	0.80	675.00	540.00
07/13/20	AZG	RESEARCHED DEFENSES TO PREFERENCE ACTIONS.	4.90	290.00	1,421.00
07/13/20	GDD	DRAFT/REVISE LIEN AND CLAIMS MEMOS RE: LIEN INVESTIGATION	2.90	600.00	1,740.00
07/13/20	SVA	T/C W/ DEAN RE ABL INVESTIGATION	0.40	800.00	320.00
07/13/20	HCJ	REVIEW/ANALYZE DRAFT OF MEMORANDUM TO COMMITTEE RE: LIENS AND POTENTIAL CLAIMS	0.30	375.00	112.50
07/13/20	GDD	CALL WITH I. WALKER AND PROVINCE TEAM RE: FRAUDULENT TRANSFER AND AVOIDANCE ISSUES	0.30	600.00	180.00
07/13/20	RMI	WORK ON DRAFT MEMO TO COMMITTEE RE: LIEN AND ANALYSIS	3.20	670.00	2,144.00
07/14/20	SVA	CORRES W/ HUYGENS RE TIMING OF PAYMENT OF DEFERRED RENT AND IP SALE PROCEEDS	0.40	800.00	320.00
07/14/20	SVA	CORRES W/ UCC PROFESSIONALS RE LENDER LIEN REVIEW MEMO AND STRATEGY	0.60	800.00	480.00
07/14/20	GDD	REVIEW FINAL LIEN AND CLAIM MEMO AND COMMUNICATIONS TO COMMITTEE AND CO-COUNSEL RE: SAME	0.40	600.00	240.00
07/14/20	SVA	CORRES W/ COMMITTEE MEMBERS RE LENDER LIEN REVIEW MEMO AND STRATEGY	0.70	800.00	560.00
07/14/20	GDD	CALL WITH S. FOX RE: CHALLENGE DEADLINE AND STATUS OF LIEN INVESTIGATION	0.10	600.00	60.00
07/14/20	SVA	REVIEW/REVISION OF LENDER LIEN REVIEW MEMO	2.70	800.00	2,160.00
07/14/20	SYC	REVIEW LIEN REVIEW MEMO	0.80	650.00	520.00
07/14/20	AZG	RESEARCHED NEW VALUE AND DRAFTED MEMO ON 547(C)(3) DEFENSE.	5.50	290.00	1,595.00
07/15/20	AZG	RESEARCHED CASELAW AND DRAFTED MEMO REGARDING PREFERENCE ACTION DEFENSES.	6.20	290.00	1,798.00
07/16/20	AZG	RESEARCHED CASELAW AND DRAFTED MEMO REGARDING PREFERENCE ACTION DEFENSES.	2.60	290.00	754.00
07/16/20	SVA	CORRES W/ DEAN RE EXTENSION OF CHALLENGE PERIOD	0.40	800.00	320.00
07/17/20	SVA	CORRES W/ DEAN RE ABL INVESTIGATION	0.40	800.00	320.00

COLE SCHOTZ P.C.

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/17/20	SYC	REVIEW EMAILS RE: LIEN REVIEW/CHALLENGE PERIOD	0.30	650.00	195.00
07/17/20	SVA	CORRES W/ S. FOX AND D. DEAN RE EXTENSION OF CHALLENGE PERIOD	0.30	800.00	240.00
07/17/20	GDD	E-MAILS WITH S. VAN AALTEN AND S. FOX RE: CHALLENGE PERIOD ISSUES	0.30	600.00	180.00
07/17/20	SVA	REVIEWED PROVINCE BUDGET AND PERFORMANCE UPDATE DECK	0.60	800.00	480.00
07/17/20	RC	FOLLOW UP EMAIL TO TOWN TITLE RE: STATUS OF SEARCHES.	0.10	310.00	31.00
07/19/20	GDD	REVIEW DOCUMENTS AND PLEADINGS RE: STIPULATION ON CHALLENGE PERIOD ISSUES	0.70	600.00	420.00
07/19/20	HCJ	DRAFT/REVISE STIPULATION EXTENDING COMMITTEE'S TIME TO CHALLENGE CERTAIN LIENS AND CLAIMS	3.20	375.00	1,200.00
07/20/20	HCJ	REVIEW/ANALYZE LOGAN COUNTY, WEST VIRGINIA PROPERTY RECORDS	0.80	375.00	300.00
07/20/20	HCJ	EMAILS WITH D.DEAN RE: PREPETITION LEINS AND COUNSEL FOR PREPETITION AGENTS	0.60	375.00	225.00
07/20/20	GDD	PREPARE STIPULATION EXTENDING CHALLENGE DEADLINE AND REVIEW OF DOCUMENTS AND PLEADINGS RE: SAME	0.80	600.00	480.00
07/20/20	SYC	EMAILS AND CALLS RE: LIEN REVIEW STIP/OWNED REAL ESTATE	0.60	650.00	390.00
07/20/20	RC	REVIEW OF WEST VIRGINIA SEARCH RESULTS.	0.10	310.00	31.00
07/20/20	HCJ	EMAILS WITH D.DEAN AND S.CARNES RE: ADDRESS OF LOGAN COUNTY STORE LOCATION	0.40	375.00	150.00
07/20/20	SVA	CORRES W/ DEAN AND CARNES RE STIPULATION EXTENDING TIME TO CHALLENGE LIENS FOR UCC	0.40	800.00	320.00
07/20/20	HCJ	REVIEW/ANALYZE DEBTORS' SCHEDULES	1.10	375.00	412.50
07/20/20	HCJ	REVISE/FINALIZE STIPULATION OF EXTENSION OF TIME FOR COMMITTEE TO CHALLENGE CERTAIN LIENS AND CLAIMS	1.80	375.00	675.00
07/20/20	AZG	DISCUSSED LETTER OF CREDIT ISSUE WITH COOLEY AND INTERNALLY.	0.30	290.00	87.00
07/20/20	IEW	REVIEW DRAFT STIPULTATION EXTENDING CHALLENGE PERIOD AND EMAIL TO D. DEAN AND HC JONES REGARDING THE SAME	0.20	675.00	135.00
07/20/20	SVA	REVIEW/COMMENT ON STIPULATION WITH LENDERS EXTENDING CHALLENGE DEADLINE FOR UCC	0.40	800.00	320.00
07/21/20	SVA	REVIEWED REVISED CHALLENGE DEADLINE EXTENSION STIPULATION FROM WELLS FARGO (.4) CORRES W/ DEAN RE SAME (.2)	0.60	800.00	480.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/22/20	SVA	CORRES W/ DEAN RE CHALLENGE PERIOD EXTENSION STIPULATION WITH LENDERS	0.40	800.00	320.00
07/23/20	RC	REVIEW FILE. EMAILS WITH TOWN TITLE RE: TEXAS SEACH; CANCEL ORDER.	0.30	310.00	93.00
07/23/20	SVA	REVIEWED FURTHER REVISED CHALLENGE PERIOD EXTENSION STIPULATION	0.20	800.00	160.00
07/23/20	MDW	REVIEW ND APPROVE FILING OF STIP RE CHALLENGE EXTENSION.	0.30	840.00	252.00
07/23/20	GDD	FINALIZE CHALLENGE PERIOD STIPULATION	0.20	600.00	120.00
07/24/20	FP	PREPARE STIPULATION EXTENDING PERIOD FOR COMMITTEE TO CHALLENGE AND EFILE (.20); DOWNLOAD FILED COPY AND CIRCULATE (.20)	0.40	305.00	122.00

DISCLOSURE STATEMENT/VOTING ISSUES **0.60** **390.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/01/20	SYC	REVIEW ENTERED DS ORDER AND EMAILS RE: CALENDARING	0.60	650.00	390.00

RETENTION MATTERS **1.90** **1,265.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/01/20	BLW	CORRESPOND WITH CO COUNSEL RE: LOCAL PRACTICE ISSUES RE: PROFESSIONAL RETENTION AND COURT APPROVAL OF SAME.	0.20	350.00	70.00
07/02/20	SVA	CORRES W/ SUSSBERG RE PJS RETENTION	0.20	800.00	160.00
07/02/20	SYC	BRIEF REVIEW OF GT RETENTION APP AND EMAILS RE: SAME	0.50	650.00	325.00
07/02/20	SYC	BRIEF REVIEW OF ENTERED RETENTION ORDERS AND EMAILS RE: SAME	0.60	650.00	390.00
07/03/20	SVA	T/C W/ DEBTOR AND LENDER COUNSEL RE PJS RETENTION	0.40	800.00	320.00

CREDITOR INQUIRIES **3.70** **2,652.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/06/20	SYC	RESPOND TO CREDITOR INQUIRIES	0.50	650.00	325.00
07/07/20	SYC	RESPOND TO CREDITOR INQUIRIES	0.40	650.00	260.00
07/13/20	SYC	RESPOND TO CREDITOR INQUIRIES RE: LEASE ISSUES	0.30	650.00	195.00
07/15/20	SYC	RESPOND TO CREDITOR INQUIRIES	0.30	650.00	195.00
07/20/20	MDW	CALLS FROM CREDITORS RE GENERAL INFORMATION RE CLAIMS.	0.50	840.00	420.00
07/21/20	MDW	CREDITOR CALLS RE CASE STATUS.	0.80	840.00	672.00
07/30/20	SYC	RESPOND TO CREDITOR INQUIRIES	0.40	650.00	260.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/31/20	SYC	RESPOND TO CREDITOR INQUIRIES	0.50	650.00	325.00

CASE ADMINISTRATION			5.80		2,425.50
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/01/20	KLL	SUBMIT ELECTRONIC SUBMISSIONS RE 7/2 HEARING	0.10	265.00	26.50
07/01/20	AZG	CORRESPONDENCE REGARDING CASE ADMINISTRATION.	0.10	290.00	29.00
07/01/20	SYC	BRIEF REVIEW OF EMERGENCY FINANCING AGREEMENT MOTION AND EMAILS RE: HEARING ON SAME	0.50	650.00	325.00
07/01/20	AZG	REVIEWED DOCKET AND CALENDARED HEARINGS AND DEADLINES.	0.40	290.00	116.00
07/02/20	AZG	REVIEWED DOCKET AND CALENDARED HEARING DATES AND DEADLINES.	0.20	290.00	58.00
07/06/20	AZG	REVIEWED DOCKET AND CALENDARED DEADLINES.	0.30	290.00	87.00
07/08/20	AZG	REVIEWED DOCKET FOR NEW FILINGS.	0.20	290.00	58.00
07/08/20	AZG	CORRESPONDENCE REGARDING CONFLICT CHECKS.	0.20	290.00	58.00
07/09/20	AZG	REVIEWED NEW DOCKET FILING NOTIFICATIONS.	0.10	290.00	29.00
07/09/20	SYC	EMAILS RE: SCHEDULING/UPCOMING DATES/DEADLINES	0.40	650.00	260.00
07/10/20	AZG	REVIEWED FILINGS AND CALENDARED DEADLINES AND HEARING DATES.	0.50	290.00	145.00
07/14/20	SYC	EMAILS RE: SCHEDULING	0.30	650.00	195.00
07/15/20	SYC	EMAILS RE: SCHEDULING	0.30	650.00	195.00
07/16/20	KLL	REVIEW COURT NOTICE ON JUDGE'S NEW VIDEO PROCEDURES AND CIRCULATE SAME TO TEAM	0.10	265.00	26.50
07/16/20	AZG	REVIEWED NEW FILING NOTICES.	0.10	290.00	29.00
07/17/20	KLL	REVIEW DOCKET ON TRANSCRIPT REQUEST FOR 6/10 HEARING	0.10	265.00	26.50
07/22/20	AZG	REVIEWED DOCKET AND CIRCULATED NEW FILINGS.	0.20	290.00	58.00
07/23/20	AZG	REVIEWED NEW FILINGS.	0.10	290.00	29.00
07/24/20	AZG	REVIEWED NEW FILINGS.	0.10	290.00	29.00
07/27/20	AZG	REVIEWED NEW FILINGS.	0.10	290.00	29.00
07/27/20	KLL	RECEIVE POC IN MAIL FROM CREIDOTR AND EMAIL SAME ON WHY SENT TO COMMITTEE	0.20	265.00	53.00
07/28/20	AZG	REVIEWED DOCKET AND CIRCULATED RELEVANT DOCUMENTS FOR STATUS CONFERENCE.	0.30	290.00	87.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/29/20	SYC	EMAILS RE: STATUS CONFERENCE	0.20	650.00	130.00
07/30/20	AZG	REVIEWED DOCKET FOR NEW FILINGS.	0.10	290.00	29.00
07/30/20	SYC	EMAILS RE: SCHEDULING AND CALENDARING	0.40	650.00	260.00
07/31/20	AZG	REVIEWED COURT DOCKET AND SCHEDULED FOLLOW UP STATUS CONFERENCE.	0.20	290.00	58.00

CLAIMS ANALYSIS, ADMINISTRATION AND OBJECTIONS **2.90** **2,260.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/11/20	SVA	CORRES W/ M. DUNDON RE FLSA CLAIMS	0.40	800.00	320.00
07/15/20	SVA	CORRES W/ DEBTORS AND HARRIS & CROSBY COUNSEL RE CLAIM RECONCILIATION	0.30	800.00	240.00
07/16/20	SVA	CORRES W/ DEBTORS AND H&C REPRESENTATIVES RE GUC AND PRIORITY CLAIM RECONCILIATIONS	0.40	800.00	320.00
07/22/20	SVA	CORRES W/ UCC MEMBERS RE CLAIMS BAR DATE	0.30	800.00	240.00
07/23/20	SVA	CORRES W/ DEBTORS AND M. DUNDON RE HARRIS & CROSBY WAGE AND HOUR CLASS CLAIMS	0.40	800.00	320.00
07/24/20	SVA	CORRES W/ DUNDON AND K&E RE HARRIS & CROSBY WAGE AND HOUR CLASS CLAIM FILINGS	0.40	800.00	320.00
07/24/20	SYC	EMAILS AND CALLS RE: CONSIGNMENT VENDORS	0.40	650.00	260.00
07/29/20	SVA	CORRES W/ DUNDON AND K&E RE WAGE AND HOUR CLASS CLAIM	0.30	800.00	240.00

ASSET ACQUISITIONS/BUSINESS COMBINATIONS **1.50** **1,200.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/16/20	SVA	T/C W/ ALTMAN RE NETJETS REFUND	0.40	800.00	320.00
07/20/20	SVA	CORRES W/ INDYKE RE NETJETS CONTRACT TERMINATION	0.20	800.00	160.00
07/20/20	SVA	CORRES W/ UCC RE NETJETS CONTRACT TERMINATION	0.40	800.00	320.00
07/21/20	SVA	CORRES W/ ALTMAN AND PRSPECTIVE BIDDER RE VISA/MASTERCARD CLAIM	0.30	800.00	240.00
07/23/20	SVA	CORRES W/ J. ALTMAN RE NETJETS CONTRACT TERMINATION	0.20	800.00	160.00

PREPARATION FOR AND ATTENDANCE AT HEARINGS **1.30** **980.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/02/20	SVA	ATTENDED HEARING ON INSURANCE MOTION	0.30	800.00	240.00
07/02/20	SYC	HEARING ON FINANCING AGREEMENT	0.40	650.00	260.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/31/20	SVA	STATUS CONFERENCE RE POTENTIAL GOING CONCERN SALE	0.60	800.00	480.00

REORGANIZATION PLAN			8.40		6,315.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/01/20	SVA	CORRES W/ UCC MEMBERS RE POST-CONFIRMATION ISSUES	0.40	800.00	320.00
07/02/20	SVA	CORRES W/ UCC RE PLAN AND DS TIMELINE AND NEXT STEPS	0.40	800.00	320.00
07/13/20	SYC	EMAILS RE: PLAN/CASE STATUS	0.50	650.00	325.00
07/14/20	SVA	T/C W/ COOLEY AND PROVINCE RE CASH FLOW FORECAST AND PLAN ISSUES	0.60	800.00	480.00
07/14/20	SYC	CALL RE: PLAN AND EXIT STRATEGY	0.50	650.00	325.00
07/22/20	SVA	CORRES W/ COOLEY AND PROVINCE RE PLAN ADMINISTRATOR SELECTION	0.30	800.00	240.00
07/23/20	SYC	CALL RE: PLAN ADMINISTRATOR AND WIND-DOWN	0.50	650.00	325.00
07/24/20	SVA	T/C W/ NIKE RE PLAN PROCESS AND ADMINISTRATOR SELECTION	0.30	800.00	240.00
07/24/20	SVA	CORRES W/ J. INDYKE RE PLAN ADMINISTRATOR SELECTION PROCESS	0.40	800.00	320.00
07/26/20	SVA	CORRES W/ INDYKE RE PLAN AND PLAN ADMINISTRATOR	0.30	800.00	240.00
07/28/20	SVA	T/C W/ BALASIANO RE PLAN ADMINISTRATOR ROLE	0.20	800.00	160.00
07/28/20	SVA	UCC CALL RE PLAN ISSUES	0.70	800.00	560.00
07/28/20	SYC	REVIEW PROVINCE MATERIALS RE: WIND-DOWN/EXIT	0.50	650.00	325.00
07/29/20	SVA	T/C W/ INDYKE AND BALASIANO RE PLAN ADMINISTRATOR ROLE	0.40	800.00	320.00
07/29/20	SVA	T/C W/ BALASIANO RE PLAN ADMINISTRATOR ROLE	0.20	800.00	160.00
07/30/20	SVA	T/C W/ INDYKE RE BUDGETING AND PLAN ISSUES	0.40	800.00	320.00
07/30/20	SVA	REVIEW/COMMENT ON PLAN SUPPLEMENT	0.60	800.00	480.00
07/30/20	SVA	CORRES W/ INDYKE AND BALASIANO RE PLAN ADMINISTRATOR SELECTION AND WORK FLOW	0.20	800.00	160.00
07/31/20	SYC	BRIEF REVIEW OF PLAN SUPPLEMENT/AMENDED PLAN AND EMAILS RE: SAME	0.50	650.00	325.00
07/31/20	SVA	CORRES W/ NIKE RE PLAN VOTING AND BALLOT INSTRUCTIONS	0.30	800.00	240.00
07/31/20	SYC	BRIEF REVIEW OF WIND-DOWN BUDGET	0.20	650.00	130.00

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ASSET DISPOSITIONS, SALES, USES, AND LEASES (SECTION 363)	6.50	5,050.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/06/20	SVA	UCC/DEBTOR UPDATE CALL RE SALE PROCESS	0.20	800.00	160.00
07/13/20	SVA	WEEKLY UPDATE CALL W/ DEBTOR PROFESSIONALS RE SALE PROCESS	0.30	800.00	240.00
07/20/20	SVA	CORRES W/ INDYKE AND PROVINCE RE REAL ESTATE SALES	0.30	800.00	240.00
07/20/20	SYC	WEEKLY CASE UPDATE CALL RE SALE PROCESS	0.20	650.00	130.00
07/20/20	SVA	WEEKLY SALE PROCESS UPDATE CALL WITH DEBTOR PROFESSIONALS	0.40	800.00	320.00
07/21/20	SVA	CORRES W/ UCC MEMBERS RE NETJETS CONTRACT TERMINATION	0.20	800.00	160.00
07/22/20	SVA	T/C W/ DEBTORS RE SALE PROCESS UPDATE	0.40	800.00	320.00
07/23/20	SVA	CONF W/ A. GRAISER RE DC SALE PROCESS	0.60	800.00	480.00
07/23/20	SVA	UCC PROFESSIONALS CALL RE SALE AND PLAN ISSUES	0.70	800.00	560.00
07/25/20	SVA	CORRES W/ SUSSBERG RE POTENTIAL GOING CONCERN BUYER	0.40	800.00	320.00
07/27/20	SVA	WEEKLY UPDATE CALL WITH DEBTORS RE SALE PROCESS DEVELOPMENTS	0.40	800.00	320.00
07/28/20	SYC	REVIEW IOI (.3); CALLS AND EMAILS RE: SALE PROCESS (.5)	0.80	650.00	520.00
07/28/20	SVA	T/C W/ DEBTORS AND LENDERS RE POTENTIAL GOING CONCERN BID	0.50	800.00	400.00
07/28/20	SVA	REVIEW IOI FROM POTENTIAL GOING CONCERN BIDDER	0.40	800.00	320.00
07/30/20	SVA	T/C W/ DEBTOR PROFESSIONALS RE POTENTIAL GOING CONCERN BID	0.40	800.00	320.00
07/31/20	SVA	T/C W/ J. ALTMAN RE AUGMENT SHARING ON GOB SALES	0.30	800.00	240.00

LEASES (REAL PROPERTY)	1.10	601.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/10/20	SYC	RESPOND TO INQUIRIES FROM LANDLORDS RE: LEASE REJECTIONS	0.50	650.00	325.00
07/13/20	AZG	REVIEWED DOCKET FOR ANY 356(D)(3) FILINGS.	0.20	290.00	58.00
07/15/20	AZG	REVIEWED DOCKET AND LEASE REJECTIONS.	0.20	290.00	58.00
07/30/20	SVA	T/C W/ J. ALTMAN RE STUB RENT RESERVE	0.20	800.00	160.00

PREFERENCES AND AVOIDANCE ACTIONS	1.00	800.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/12/20	SVA	CORRES W/ INDYKE AND PROVINCE RE PREFERENCE CLAIMS ANALYSIS	0.60	800.00	480.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/13/20	SVA	CORRES W/ INDYKE AND HUYGENS RE PREFERENCE CLAIMS	0.40	800.00	320.00

BUSINESS OPERATIONS			0.50		325.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/17/20	SYC	REVIEW BRG UPDATE	0.50	650.00	325.00

COMMITTEE MATTERS AND CREDITOR MEETINGS			2.20		1,490.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/06/20	SYC	WEEKLY UPDATE CALL	0.30	650.00	195.00
07/13/20	SYC	WEEKLY CASE UPDATE CALL	0.20	650.00	130.00
07/28/20	SVA	REVIEW/COMMENT ON PROVINCE DECK FOR 7.29 UCC UPDATE CALL	0.40	800.00	320.00
07/28/20	SYC	ATTEND COMMITTEE CALL	0.70	650.00	455.00
07/30/20	SYC	CALL WITH DEBTORS' ADVISORS RE: WIND-DOWN	0.60	650.00	390.00

CASH COLLATERAL AND DIP FINANCING			1.10		880.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/30/20	SVA	REVIEWED PROVINCE UPDATE MATERIALS ON BUDGET CONSIDERATIONS AND PROJECTIONS	0.40	800.00	320.00
07/31/20	SVA	REVIEWED DRAFT WIND DOWN BUDGET FROM BRG	0.70	800.00	560.00

REPORTS; STATEMENTS AND SCHEDULES			0.40		320.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
07/02/20	SVA	REVIEWED PROVINCE UCC MEMO RE SOFAS AND SCHEDULES	0.40	800.00	320.00

TOTAL HOURS 227.50

PROFESSIONAL SERVICES: \$128,459.50

TIMEKEEPER SUMMARY

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Benjamin L. Wallen	Associate	0.20	350.00	70.00
Carnes, Sarah A.	Associate	23.30	650.00	15,145.00
Frances Pisano	Paralegal	0.40	305.00	122.00
G. David Dean	Member	51.50	600.00	30,900.00
Garrastegui, Adam	Associate	42.20	290.00	12,238.00
Irving E. Walker	Member	16.90	675.00	11,407.50

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<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Jones, H.C.	Associate	23.20	375.00	8,700.00
Kerri L. LaBrada	Paralegal	2.10	265.00	556.50
Kim McEllen	Paralegal	0.30	290.00	87.00
Michael D. Warner	Member	4.50	840.00	3,780.00
Nace, Shelby	Associate	2.10	325.00	682.50
Roger M. Iorio	Member	27.50	670.00	18,425.00
Rosanne Cohen	Paralegal	0.60	310.00	186.00
Van Aalten, Seth	Member	32.70	800.00	26,160.00
Total		227.50		\$128,459.50

COST DETAIL

<u>DATE</u>	<u>Description</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
05/26/20	CONFERENCE CALL	115.00	6.20
06/02/20	ONLINE RESEARCH	1.00	0.10
06/03/20	CONFERENCE CALL	492.00	25.14
06/18/20	ONLINE RESEARCH	1.00	0.10
06/18/20	ONLINE RESEARCH	4.00	0.40
06/18/20	ONLINE RESEARCH	1.00	0.10
06/18/20	ONLINE RESEARCH	3.00	0.30
06/18/20	ONLINE RESEARCH	28.00	2.80
06/18/20	ONLINE RESEARCH	2.00	0.20
06/22/20	ONLINE RESEARCH	10.00	1.00
06/22/20	ONLINE RESEARCH	6.00	0.60
06/22/20	ONLINE RESEARCH	30.00	3.00
06/22/20	ONLINE RESEARCH	6.00	0.60
06/22/20	ONLINE RESEARCH	15.00	1.50
06/22/20	ONLINE RESEARCH	11.00	1.10
06/22/20	ONLINE RESEARCH	5.00	0.50
06/22/20	ONLINE RESEARCH	2.00	0.20
06/22/20	ONLINE RESEARCH	6.00	0.60
06/22/20	ONLINE RESEARCH	6.00	0.60
06/22/20	ONLINE RESEARCH	8.00	0.80
06/22/20	ONLINE RESEARCH	30.00	3.00
07/06/20	PHOTOCOPY /PRINTING/SCANNING	12.00	2.40
07/06/20	PHOTOCOPY /PRINTING/SCANNING	29.00	5.80
07/06/20	PHOTOCOPY /PRINTING/SCANNING	18.00	3.60
07/07/20	ONLINE RESEARCH	1.00	9.25
07/08/20	ONLINE RESEARCH	1.00	18.51

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<u>DATE</u>	<u>Description</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
07/09/20	ONLINE RESEARCH	1.00	9.25
07/10/20	ONLINE RESEARCH	1.00	17.36
07/13/20	ONLINE RESEARCH	1.00	27.77
07/13/20	PHOTOCOPY /PRINTING/SCANNING	15.00	3.00
07/15/20	ONLINE RESEARCH	1.00	37.02
	Total		\$182.80

TOTAL SERVICES AND COSTS: \$ 128,642.30

EXHIBIT 6

**EXPENSE SUMMARY FROM
MAY 22, 2020 THROUGH JULY 31, 2020**

Expense	Billed Amount
Conference Call	\$37.09
Photocopy	\$20.40
Online Research	\$164.50
TOTAL:	\$221.99