

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

In re: TEHUM CARE SERVICES, INC., ¹ Debtor.	Chapter 11 Case No. 23-90086 (CML)
--	---

**SUMMARY COVERSHEET TO FIRST INTERIM FEE APPLICATION
OF BROWN RUDNICK LLP FOR COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES INCURRED
AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS
FOR THE PERIOD FROM NOVEMBER 22, 2023, THROUGH MARCH 31, 2024**

Name of Professional:	Brown Rudnick LLP
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, effective as of November 22, 2023 [ECF No. 1294]
Interim Application (X) Final Application ()	First Interim Fee Application
Time Period Covered by this Application for which interim compensation has not previously been awarded:	November 22, 2023 – March 31, 2024
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case?	Yes
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed?	Yes
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases?	Yes
Do expense reimbursements represent actual and necessary expenses incurred?	Yes
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$2,644,262.50
Total professional hours covered by this statement:	2,230.4
Average hourly rate for professionals:	\$1,185.56

¹ The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.



Total paraprofessional fees covered by this statement:	\$77,257.00
Total paraprofessional hours covered by this statement:	154.7
Average hourly rate for paraprofessionals:	\$499.40
Total fees requested in this Application:	\$2,721,519.50
Total expense reimbursements requested in this Application:	\$95,703.41
Total fees and expenses requested in this Application:	\$2,817,222.91
Total fees and expenses requested in all prior Applications:	N/A

Plan Status: The Debtor filed a second amended disclosure statement in October 2023.

Primary Benefits: Throughout the Application Period, as co-counsel to the TCC, Brown Rudnick: (i) objected to the Debtor's and the UCC's Rule 9019 Motion (D.I. 1386), (ii) moved to dismiss the Debtor's chapter 11 case (D.I. 1260 & 1404), (iii) propounded discovery, deposed witnesses, and analyzed documents produced by parties, (iv) moved to compel discovery or to preclude the Debtor and the UCC from offering certain evidence at trial (D.I. 1418 & 1422); (v) engaged in mediation and attempted to engage in further mediation; (vi) objected to the Debtor's exclusivity motion and DIP financing (D.I. 1303 & 1332); and (vii) met with and advised Committee members and their advisors.

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

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**FIRST INTERIM FEE APPLICATION OF BROWN
RUDNICK LLP FOR COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES INCURRED
AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS
FOR THE PERIOD FROM NOVEMBER 22, 2023, THROUGH MARCH 31, 2024**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Brown Rudnick LLP (“**Brown Rudnick**”), co-counsel to the Official Committee of Tort Claimants (the “**TCC**”), hereby submits its *First Interim Fee Application of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from November 22, 2023 through March 31, 2024* (the “**Application**”) for interim allowance of compensation for professional services provided in the amount of \$2,721,519.50 and reimbursement of actual and necessary expenses in the amount of \$95,703.41 that Brown Rudnick incurred for the period from

¹ The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

November 22, 2023 through March 31, 2024 (the “**Application Period**”). In support of this Application, Brown Rudnick attaches the following exhibits:

EXHIBIT	DESCRIPTION
A	First Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from November 22, 2023 through December 31, 2023 [Docket No. 1310]
B	Second Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from January 1, 2024 through January 31, 2024 [Docket No. 1416]
C	Third Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from February 1, 2023 through February 29, 2024 [Docket No. 1443]
D	Fourth Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses Co-Counsel to the Official Committee of Tort Claimants for the Period from March 1, 2024 through March 31, 2024 [Docket No. 1523]
E	Supplement to First Interim Fee Application

NOTICE

Pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 357] (the “**Interim Compensation Order**”), notice of this Fee Application will be provided to the Application Recipients (as defined in the Interim Compensation Order).

[Remainder of Page Intentionally Left Blank]

Dated: April 23, 2024
New York, NY

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Eric R. Goodman

David J. Molton (*pro hac vice*)

Eric R. Goodman (*pro hac vice*)

D. Cameron Moxley (*pro hac vice*)

Jessica N. Meyers (*pro hac vice*)

Gerard T. Cicero (*pro hac vice*)

Meghan McCafferty (*pro hac vice*)

Seven Times Square

New York, NY 10036

Telephone: (212) 209-4800

Facsimile: (212) 209-4801

Email: dmolton@brownrudnick.com

egoodman@brownrudnick.com

cmoxley@brownrudnick.com

jmeyers@brownrudnick.com

gcicero@brownrudnick.com

mmccafferty@brownrudnick.com

CERTIFICATE OF SERVICE

I certify that on April 23, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Eric R. Goodman

Exhibit A

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

In re: TEHUM CARE SERVICES, INC., ¹ Debtor.	Chapter 11 Case No. 23-90086 (CML)
--	---

**FIRST MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP FOR
 COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
 EXPENSES AS CO-COUNSEL TO THE OFFICIAL COMMITTEE
OF TORT CLAIMANTS FOR THE PERIOD FROM NOVEMBER 22, 2023 THROUGH
 DECEMBER 31, 2023**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Brown Rudnick LLP
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 22, 2023 [ECF No. 1294]
Time Period Covered:	November 22, 2023 – December 31, 2023
Total Fees Sought:	\$115,000.67
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$126,840.00
Total professional hours covered by this statement:	125.40
Average hourly rate for professionals:	\$1,011.48

¹ The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.



Total paraprofessional fees covered by this statement:	\$9,849.00
Total paraprofessional hours covered by this statement:	20.10
Average hourly rate for paraprofessionals:	\$490.00
Reimbursable expenses sought in this statement:	\$5,649.47
Payment requested:	
80% Fees	\$109,351.20
100% Expenses	\$5,649.47
Total:	\$115,000.67

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Brown Rudnick LLP as Co-Counsel for the Official Committee of Tort Claimants as of November 22, 2023 [ECF No. 1294], the law firm of Brown Rudnick LLP (“Brown Rudnick”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this First Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from November 22, 2023 to December 31, 2023 (the “First Monthly Fee Statement”). By the First Monthly Fee Statement and pursuant to the Interim Compensation Order, Brown Rudnick seeks interim payment of (i) \$109,351.20 (80% of \$136,689.00) as compensation for professional services rendered to the Committee and (ii) \$5,649.47 for reimbursement of actual and necessary expenses, for a total of \$115,000.67 for

the period November 22, 2023 through and including December 31, 2023 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this First Monthly Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this First Monthly Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Brown Rudnick partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Brown Rudnick established in accordance with its internal billing procedures. As reflected in Exhibit A, Brown Rudnick incurred \$136,689.00 in fees during the Fee Period. Pursuant to this First Monthly Fee Statement, Brown Rudnick seeks compensation in the amount of \$109,351.20 or 80% of such fees

Exhibit B is a schedule providing certain information regarding the Brown Rudnick attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this First Monthly Fee Statement. Attorneys and paraprofessionals of Brown Rudnick expended a total of 145.50 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this First Monthly Fee Statement. This First Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$5,649.47.

Exhibit D consists of Brown Rudnick’s detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Brown Rudnick has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this First Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Brown Rudnick reserves the right to seek payment of such fees

and expenses not included herein. Subsequent monthly fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Brown Rudnick respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$115,000.67, consisting of (i) \$109,351.20, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Brown Rudnick, and (ii) \$5,649.47, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: January 30, 2024
New York, NY

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Eric R. Goodman

David J. Molton (*pro hac vice forthcoming*)
Eric R. Goodman (*pro hac vice forthcoming*)
Gerard T. Cicero (*pro hac vice forthcoming*)
Seven Times Square
New York, NY 10036
Telephone: (212) 209-4800
Facsimile: (212) 209-4801
Email: dmolton@brownrudnick.com
 egoodman@brownrudnick.com
 gcicero@brownrudnick.com

-AND-

Jeffrey L. Jonas (*pro hac vice forthcoming*)
Sunni P. Beville (*pro hac vice forthcoming*)
One Financial Center
Boston, MA 02111
Telephone: (617) 856-8200
Facsimile: (617) 856-8201
Email: jjonas@brownrudnick.com
 sbeville@brownrudnick.com

CERTIFICATE OF SERVICE

I certify that on January 30, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Eric R. Goodman
Eric R. Goodman

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

FEE APPLICATION DATA

1/26/2024



CLIENT: 040178

1

Bill Date range: 1/19/2024 to 1/19/2024

CLNT MATT CODE	MATTER NAME	ID	EMPLOYEE NAME	BASE HRS	BASE AMT	BILLED HRS	BILLED AMT	
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	4749	BURNS, THOMAS	1.60	784.00	1.60	\$784.00	
				1.60	784.00	1.60	\$784.00	
040178.0002	ASSET ANALYSIS AND RECOVERY	4435	GOODMAN, ERIC R.	0.30	397.50	0.30	\$397.50	
				0.30	397.50	0.30	\$397.50	
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	3660	CICERO, GERARD T.	1.00	1,000.00	1.00	\$1,000.00	
			4435	GOODMAN, ERIC R.	0.50	662.50	0.50	\$662.50
				1.50	1,662.50	1.50	\$1,662.50	
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	4768	CALHOUN, ETHAN H.	0.30	190.50	0.30	\$190.50	
				0.30	190.50	0.30	\$190.50	
040178.0008	FEE/EMPLOYMENT APPLICATIONS	3660	CICERO, GERARD T.	5.90	5,900.00	5.90	\$5,900.00	
			4435	GOODMAN, ERIC R.	0.50	662.50	0.50	\$662.50
			4749	BURNS, THOMAS	0.70	343.00	0.70	\$343.00
			4768	CALHOUN, ETHAN H.	4.50	2,857.50	4.50	\$2,857.50
			11.60	9,763.00	11.60	\$9,763.00		
040178.0009	FEE/EMPLOYMENT OBJECTIONS	4435	GOODMAN, ERIC R.	0.00	0.00	0.00	\$0.00	
				0.00	0.00	0.00	\$0.00	
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	3660	CICERO, GERARD T.	22.50	22,500.00	22.50	\$22,500.00	
			3663	MEYERS, JESSICA N.	1.50	1,507.50	1.50	\$1,507.50
			4146	MCCAFFERTY, MEGHAN	9.10	8,099.00	9.10	\$8,099.00
			4435	GOODMAN, ERIC R.	25.50	33,787.50	25.50	\$33,787.50
			4473	VEILLEUX, BRITTANY E.	17.80	8,722.00	17.80	\$8,722.00
			4768	CALHOUN, ETHAN H.	18.80	11,938.00	18.80	\$11,938.00
			95.20	86,554.00	95.20	\$86,554.00		
040178.0014	PLAN AND DISCLOSURE STATEMENT	3660	CICERO, GERARD T.	2.50	2,500.00	2.50	\$2,500.00	
			4768	CALHOUN, ETHAN H.	2.50	1,587.50	2.50	\$1,587.50
				5.00	4,087.50	5.00	\$4,087.50	
040178.0015	MEDIATION/SETTLEMENT	3660	CICERO, GERARD T.	18.50	18,500.00	18.50	\$18,500.00	
			4435	GOODMAN, ERIC R.	10.00	13,250.00	10.00	\$13,250.00
				28.50	31,750.00	28.50	\$31,750.00	
040178.0016	COURT ATTENDANCE	3660	CICERO, GERARD T.	1.50	1,500.00	1.50	\$1,500.00	
				1.50	1,500.00	1.50	\$1,500.00	
				145.50	136,689.00	145.50	\$136,689.00	

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

SUMMARY OF TIME & COMPENSATION

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
Eric R. Goodman	Partner; Admitted to Ohio Bar in 2003; Admitted to New York Bar in 2018; Admitted to Illinois Bar in 2020; Admitted to District Court of Columbia Bar in 2021; Admitted to Massachusetts Bar in 2021; Dispute Resolution & Restructuring	\$1,325	36.80	\$48,760.00
Gerard T. Cicero	Partner; Admitted to New Jersey Bar in 2015; Admitted to New York Bar in 2016; Dispute Resolution & Restructuring	\$1,000	51.90	\$51,900.00
Jessica N. Meyers	Partner; Admitted in Massachusetts Bar in 2015; Admitted to New York Bar in 2017; Dispute Resolution & Restructuring	\$1,005	1.50	\$1,507.50
Meghan McCafferty	Associate; Admitted to Massachusetts Bar in 2019; Dispute Resolution & Restructuring	\$890	9.10	\$8,099.00
Ethan H. Calhoun	Associate; Admitted to Alabama Bar in 2021; Admitted to New York Bar in 2023; Dispute Resolution & Restructuring	\$635	26.10	\$16,573.50
TOTAL			125.40	\$126,840.00
PROFESSIONAL BLENDED RATE		\$1,011.48		

COMPENSATION BY PARAPROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
Brittany E. Veilleux	Litigation Technology Specialist	\$490	17.80	\$8,722.00
Thomas Burns	Paralegal; Bankruptcy & Corporate Restructuring	\$490	2.30	\$1,127.00
TOTAL			20.10	\$9,849.00
PARAPROFESSIONAL BLENDED RATE		\$490.00		

EXHIBIT C

Record of Expenses

BILLED DISBURSEMENTS

Client: TEHUM CARE SERVICES, INC., OFFICIAL TORT (040178)

Amounts shown in USD

BILL NUM	BILL DATE	CLIENT NAME	COST DESC	HARD/SOFT	BASE AMT	BILLED AMT
6972527	1/19/2024	TEHUM CARE SERVICES, INC., OFFICIAL TORT	Copies	S	2.00	2.00
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Document Production	S	180.00	0.00
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	eDiscovery Hosting	S	2,140.40	2,140.40
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Filing Fee	H	300.00	300.00
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Hotel	H	1,245.93	1,245.93
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Lexis	S	21.97	21.97
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Meals	H	67.22	67.22
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Parking and Tolls	H	45.00	45.00
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Taxi	H	109.95	109.95
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Westlaw Online Transactional Searches / Docs	S	1,717.00	1,717.00
					5,829.47	5,649.47
Total					5,829.47	5,649.47

EXHIBIT D

Detailed Record of Time Entries



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

INVOICE

For professional services rendered in connection with the above captioned matter through December 31, 2023:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	784.00	5,649.47	6,433.47
040178.0002	ASSET ANALYSIS AND RECOVERY	397.50	0.00	397.50
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	1,662.50	0.00	1,662.50
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	190.50	0.00	190.50
040178.0008	FEE/EMPLOYMENT APPLICATIONS	9,763.00	0.00	9,763.00
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	86,554.00	0.00	86,554.00
040178.0014	PLAN AND DISCLOSURE STATEMENT	4,087.50	0.00	4,087.50
040178.0015	MEDIATION/SETTLEMENT	31,750.00	0.00	31,750.00
040178.0016	COURT ATTENDANCE	1,500.00	0.00	1,500.00
	Total	136,689.00	5,649.47	142,338.47

Total Current Fees	\$136,689.00
20% Holdback Amount	(27,337.80)
80% CURRENT BALANCE DUE	\$109,351.20
Total Current Costs	\$5,649.47
Total Invoice	\$115,000.67



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: CASE ADMINISTRATION/DISBURSEMENTS

INVOICE

For professional services rendered in connection with the above captioned matter through December 31, 2023:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	784.00	5,649.47	6,433.47
	Total	784.00	5,649.47	6,433.47

Total Current Fees	\$784.00
Total Current Costs	\$5,649.47
Total Invoice	\$6,433.47



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
January 19, 2024

Invoice 6972596
Page 3

RE: CASE ADMINISTRATION/DISBURSEMENTS

TIME DETAIL

Date	Professional	Description	Hours	Value
12/06/23	BURNS	PREPARED AND FILED PRO HAC VICE MOTIONS FOR D. CICERO, D. MOLTON, AND E. GOODMAN	0.80	392.00
12/06/23	BURNS	REVIEW AND ANALYZE DOCKET, CIRCULATE RECENT PERTINENT ENTRIES	0.10	49.00
12/08/23	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	98.00
12/11/23	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	98.00
12/14/23	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2)	0.30	147.00
Total Hours and Fees			1.60	784.00

TIME SUMMARY

Professional	Hours	Rate	Value
THOMAS BURNS	1.60 hours at	490.00	784.00
Total Fees			784.00

COST SUMMARY

Description	Value
FILING FEE	300.00
PARKING AND TOLLS	45.00
MEALS	67.22
TAXI	109.95
HOTEL	1,245.93
LEXIS	21.97
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	1,717.00
EDISCOVERY HOSTING	2,140.40
COPIES	2.00
Total Costs	5,649.47



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: ASSET ANALYSIS AND RECOVERY

INVOICE

For professional services rendered in connection with the above captioned matter through December 31, 2023:

Matter No.	Matter Name	Fees	Costs	Total
040178.0002	ASSET ANALYSIS AND RECOVERY	397.50	0.00	397.50
	Total	397.50	0.00	397.50

Total Current Fees	\$397.50
Total Current Costs	\$0.00
Total Invoice	\$397.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 January 19, 2024

Invoice 6972596
 Page 5

RE: ASSET ANALYSIS AND RECOVERY

TIME DETAIL

Date	Professional	Description	Hours	Value
12/18/23	GOODMAN	CONFERENCE WITH MR. ATKINSON REGARDING CLAIMS ANALYSIS	0.30	397.50
Total Hours and Fees			0.30	397.50

TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	0.30 hours at	1,325.00	397.50
Total Fees			397.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH
COMMITTEE/CREDITORS

INVOICE

For professional services rendered in connection with the above captioned matter
through December 31, 2023:

Matter No.	Matter Name	Fees	Costs	Total
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	1,662.50	0.00	1,662.50
	Total	1,662.50	0.00	1,662.50

Total Current Fees	\$1,662.50
Total Current Costs	\$0.00
Total Invoice	\$1,662.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 January 19, 2024

Invoice 6972596
 Page 7

RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

TIME DETAIL

Date	Professional	Description	Hours	Value
12/19/23	CICERO	PARTICIPATE IN WEEKLY COMMITTEE STRATEGY AND UPDATE CALL	1.00	1,000.00
12/19/23	GOODMAN	ATTEND COMMITTEE MEETING REGARDING MEDIATION AND CASE STATUS	0.50	662.50
Total Hours and Fees			1.50	1,662.50

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	1.00 hours at	1,000.00	1,000.00
ERIC R. GOODMAN	0.50 hours at	1,325.00	662.50
Total Fees			1,662.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

INVOICE

For professional services rendered in connection with the above captioned matter through December 31, 2023:

Matter No.	Matter Name	Fees	Costs	Total
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	190.50	0.00	190.50
	Total	190.50	0.00	190.50

Total Current Fees	\$190.50
Total Current Costs	\$0.00
Total Invoice	\$190.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
January 19, 2024

Invoice 6972596
Page 9

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

TIME DETAIL

Date	Professional	Description	Hours	Value
12/27/23	CALHOUN	DISCUSSIONS WITH CO-COUNSEL CONCERNING DISCOVERY DOCUMENTS	0.30	190.50
Total Hours and Fees			0.30	190.50

TIME SUMMARY

Professional	Hours	Rate	Value
ETHAN H. CALHOUN	0.30 hours at	635.00	190.50
Total Fees			190.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: FEE/EMPLOYMENT APPLICATIONS

INVOICE

For professional services rendered in connection with the above captioned matter through December 31, 2023:

Matter No.	Matter Name	Fees	Costs	Total
040178.0008	FEE/EMPLOYMENT APPLICATIONS	9,763.00	0.00	9,763.00
	Total	9,763.00	0.00	9,763.00

Total Current Fees	\$9,763.00
Total Current Costs	\$0.00
Total Invoice	\$9,763.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
January 19, 2024

Invoice 6972596
Page 11

RE: FEE/EMPLOYMENT APPLICATIONS

TIME DETAIL

Date	Professional	Description	Hours	Value
12/18/23	CALHOUN	ANALYZING CONFLICTS AND DRAFTING RETENTION APPLICATION	0.40	254.00
12/18/23	BURNS	FACILITATE THE CREATION OF EXHIBITS FOR RETENTION APPLICATION	0.30	147.00
12/20/23	CALHOUN	ANALYZING RETENTION APPLICATION DRAFT DOCUMENTS	0.50	317.50
12/21/23	CICERO	DRAFT AND REVISE EMPLOYMENT APPLICATION	5.90	5,900.00
12/21/23	GOODMAN	REVIEW FEE APPLICATION AND DECLARATION IN SUPPORT	0.50	662.50
12/21/23	CALHOUN	REVISING RETENTION APPLICATION AND EXHIBITS	0.60	381.00
12/21/23	CALHOUN	REVISING AND REVIEWING RETENTION APPLICATION AND EXHIBITS	0.70	444.50
12/21/23	BURNS	WORK ON RETENTION	0.40	196.00
12/22/23	CALHOUN	PREPARING RETENTION APPLICATION AND EXHIBITS FOR FILING	2.30	1,460.50
Total Hours and Fees			11.60	9,763.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	5.90 hours at	1,000.00	5,900.00
ERIC R. GOODMAN	0.50 hours at	1,325.00	662.50
THOMAS BURNS	0.70 hours at	490.00	343.00
ETHAN H. CALHOUN	4.50 hours at	635.00	2,857.50
Total Fees			9,763.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

INVOICE

For professional services rendered in connection with the above captioned matter through December 31, 2023:

Matter No.	Matter Name	Fees	Costs	Total
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	86,554.00	0.00	86,554.00
	Total	86,554.00	0.00	86,554.00

Total Current Fees	\$86,554.00
Total Current Costs	\$0.00
Total Invoice	\$86,554.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
January 19, 2024

Invoice 6972596
Page 13

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

TIME DETAIL

Date	Professional	Description	Hours	Value
12/06/23	CICERO	REVISE DRAFT PLEADING OUTLINE RE: CASE STRATEGY (2.0); CALL WITH E. GOODMAN RE: SAME (.6)	2.60	2,600.00
12/07/23	CICERO	CONTINUED WORK ON CASE BACKGROUND FOR POTENTIAL PLEADING	3.00	3,000.00
12/07/23	VEILLEUX	ORGANIZE AND PREPARE ELECTRONIC DATA FOR INCLUSION INTO REVIEW DATABASE PER CASE TEAM SPECIFICATIONS (1.1); DESIGN AND CREATE DATABASE PER CASE TEAM SPECIFICATIONS FOR DOCUMENT MANAGEMENT AND REVIEW (.4); LOAD DATA SET TO DATABASE FOR CASE TEAM ACCESS (4.3)	5.80	2,842.00
12/08/23	VEILLEUX	LOAD DATA SET TO DATABASE FOR CASE TEAM ACCESS (4.9); QUERY DATABASE PER CASE TEAM SPECIFICATIONS AND REPORT FINDINGS (.6)	5.40	2,646.00
12/09/23	VEILLEUX	LOAD DATA SET TO DATABASE FOR CASE TEAM ACCESS	0.70	343.00
12/10/23	VEILLEUX	LOAD DATA SET TO DATABASE FOR CASE TEAM ACCESS	0.90	441.00
12/11/23	CALHOUN	ANALYZING DISCOVERY MATERIALS PRODUCED BY DEBTORS	4.80	3,048.00
12/11/23	CALHOUN	ANALYZING DISCOVERY MATERIALS PRODUCED BY M2LOANCO	1.10	698.50
12/12/23	CALHOUN	ANALYZING DISCOVERY DOCUMENTS PRODUCED BY THE DEBTOR, M2LOANCO, AND GENEVA	3.90	2,476.50
12/12/23	CALHOUN	ANALYZING DISCOVERY DOCUMENTS PRODUCED BY THE DEBTOR, M2LOANCO, AND GENEVA	1.50	952.50
12/12/23	CALHOUN	ANALYZING CASE LAW AND PRIOR RULINGS RELATED TO THE CASE FOR MOTION TO DISMISS IN THE EVENT MEDIATION FAILS	1.50	952.50
12/12/23	CICERO	RESEARCH, DRAFT AND REVISE PLEADING IN EVENT MEDIATION FAILS	5.50	5,500.00
12/12/23	VEILLEUX	CONFER WITH CASE TEAM REGARDING INCOMING DATASET (.4); LOAD DATA SET TO DATABASE FOR CASE TEAM ACCESS (2.6); QUERY DATABASE PER CASE TEAM SPECIFICATIONS AND REPORT FINDINGS (.2)	3.20	1,568.00
12/13/23	GOODMAN	DRAFT AND EDIT MOTION TO DISMISS CHAPTER 11 CASE IN THE EVENT MEDIATION FAILS	10.60	14,045.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
January 19, 2024

Invoice 6972596
Page 14

Date	Professional	Description	Hours	Value
12/13/23	CALHOUN	ANALYZING DRAFT OF MOTION TO DISMISS IN THE EVENT MEDIATION FAILS	0.50	317.50
12/13/23	CICERO	STRATEGY MEETING WITH E. GOODMAN (.9); REVISE DISMISSAL MOTION IN THE EVENT MEDIATION FAILS (2.1)	3.00	3,000.00
12/14/23	GOODMAN	EDIT AND REVISE MOTION TO DISMISS AND PROPOSED ORDER IN THE EVENT MEDIATION FAILS	1.00	1,325.00
12/15/23	GOODMAN	EDIT AND REVISE MOTION TO DISMISS CHAPTER 11 CASE IN THE EVENT MEDIATION FAILS	2.80	3,710.00
12/15/23	CICERO	DRAFT AND REVISE PLEADING IN EVENT MEDIATION FAILS RE: DISMISSAL	4.50	4,500.00
12/16/23	GOODMAN	EDIT AND REVISE MOTION TO DISMISS IN THE EVENT MEDIATION FAILS	1.30	1,722.50
12/17/23	GOODMAN	EDIT AND REVISION MOTION TO DISMISS IN THE EVENT MEDIATION FAILS	1.00	1,325.00
12/18/23	GOODMAN	EDIT AND REVISE MOTION TO DISMISS IN THE EVENT MEDIATION FAILS	1.40	1,855.00
12/18/23	CICERO	DRAFT AND REVISE MOTION TO DISMISS IN THE EVENT MEDIATION FAILS	2.60	2,600.00
12/18/23	VEILLEUX	EVALUATE DATA SET FOR CASE TEAM TO PROVIDE INFORMATION REGARDING DATA CONTENTS AND INTEGRITY (.2); ORGANIZE AND PREPARE ELECTRONIC DATA FOR DELIVERY TO VENDOR (NAME) PER CASE TEAM SPECIFICATIONS (.1); LOAD DATA SET TO DATABASE FOR CASE TEAM ACCESS (.3); QUERY DATABASE PER CASE TEAM SPECIFICATIONS AND REPORT FINDINGS (.1)	0.70	343.00
12/19/23	MCCAFFERTY	IN THE EVENT MEDIATION FAILS REVIEW AND ANALYZE MOTION TO DISMISS IN THE EVENT MEDIATION FAILS IN SUPPORT OF RESEARCH QUESTIONS (.5); PREPARE RESEARCH ON SUCCESSOR LIABILITY AND ALTER EGO CLAIMS TO DRAFT REVISIONS TO MOTION TO DISMISS IN THE EVENT MEDIATION FAILS (.6)	1.10	979.00
12/19/23	GOODMAN	EDIT AND REVISE MOTION TO DISMISS IN THE EVENT MEDIATION FAILS	0.20	265.00
12/19/23	CICERO	REVIEW CASE LAW ON SUCCESSORSHIP ISSUES FOR MTD	1.30	1,300.00
12/19/23	GOODMAN	CONFERENCE CALL WITH MS. MCCAFFERTY REGARDING MOTION TO DISMISS AND RESEARCH IN SUPPORT IN THE EVENT MEDIATION FAILS	0.50	662.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
January 19, 2024

Invoice 6972596
Page 15

Date	Professional	Description	Hours	Value
12/20/23	GOODMAN	EDIT AND REVISE MOTION TO DISMISS IN THE EVENT MEDIATION FAILS (.5); FURTHER RESEARCH IN SUPPORT OF MOTION TO DISMISS IN THE EVENT MEDIATION FAILS (1.5); TELEPHONE CALL WITH MS. MEYERS AND MR. CICERO REGARDING MOTION TO DISMISS IN THE EVENT MEDIATION FAILS (.7)	2.70	3,577.50
12/21/23	MEYERS	REVIEW AND PROPOSE REVISIONS TO DRAFT MOTION TO DISMISS BANKRUPTCY CASE IN THE EVENT MEDIATION FAILS	1.50	1,507.50
12/21/23	GOODMAN	EDIT AND REVISE MOTION TO DISMISS IN THE EVENT MEDIATION FAILS AND PROPOSED ORDER (2.3); FURTHER RESEARCH IN SUPPORT OF MOTION TO DISMISS IN THE EVENT MEDIATION FAILS (.5)	2.80	3,710.00
12/22/23	GOODMAN	EDIT AND REVISE MOTION TO DISMISS CHAPTER 11 CASE IN THE EVENT MEDIATION FAILS	0.50	662.50
12/22/23	VEILLEUX	MODIFY DATABASE SECURITY TO ADD AUTHORIZED COMPUTER ACCESS PER CASE TEAM SPECIFICATIONS (.3); CONFER WITH CASE TEAM REGARDING EXTERNAL USER ACCESS (.1)	0.40	196.00
12/23/23	GOODMAN	FURTHER REVISIONS TO MOTION TO DISMISS IN THE EVENT MEDIATION FAILS AND COMMUNICATIONS WITH MS.. MEYERS REGARDING THE SAME	0.30	397.50
12/23/23	MCCAFFERTY	RESEARCH TEXAS CHOICE OF LAW ISSUES IN SUPPORT OF MOTION TO DISMISS IN THE EVENT MEDIATION FAILS (.9); RESEARCH SUCCESSOR LIABILITY LAW IN SUPPORT OF MOTION TO DISMISS IN THE EVENT MEDIATION FAILS (1.3); DRAFT REVISIONS TO MOTION TO DISMISS IN THE EVENT MEDIATION FAILS (.4)	2.60	2,314.00
12/26/23	GOODMAN	TELEPHONE CALL WITH MR. CICERO REGARDING MOTION TO DISMISS IN THE EVENT MEDIATION FAILS AND RELATED MATTERS	0.40	530.00
12/26/23	VEILLEUX	CONFER WITH CASE TEAM REGARDING EXTERNAL USER ACCESS	0.20	98.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
January 19, 2024

Invoice 6972596
Page 16

Date	Professional	Description	Hours	Value
12/27/23	MCCAFFERTY	RESEARCH SUCCESSOR LIABILITY LAW IN SUPPORT OF MOTION TO DISMISS IN THE EVENT MEDIATION FAILS(1.5); RESEARCH ALTER EGO LAW IN SUPPORT OF MOTION TO DISMISS IN THE EVENT MEDIATION FAILS (1.6); RESEARCH CHOICE OF LAW WITH RESPECT TO INDIRECT LIABILITY CAUSES OF ACTION IN SUPPORT OF MOTION TO DISMISS IN THE EVENT MEDIATION FAILS (1.2); DRAFT REVISED MOTION TO DISMISS IN THE EVENT MEDIATION FAILS INCLUDING RESEARCH FINDINGS (1.1)	5.40	4,806.00
12/27/23	CALHOUN	ANALYZING DISCOVERY DOCUMENTS SUBMITTED BY DEBTORS	1.00	635.00
12/27/23	CALHOUN	ANALYZING DISCOVERY DOCUMENTS SUBMITTED BY DEBTORS	3.10	1,968.50
12/27/23	VEILLEUX	CONFER WITH CASE TEAM REGARDING EXTERNAL USER ACCOUNTS (.1); CONFER WITH CASE TEAM REGARDING WORKFLOW FOR EXTERNAL USERS (.1)	0.20	98.00
12/28/23	VEILLEUX	MODIFY DATABASE SECURITY TO ADD AUTHORIZED COMPUTER ACCESS PER CASE TEAM SPECIFICATIONS (.1); CONFER WITH CASE TEAM REGARDING VIEWPOINT FUNCTIONALITY (.2)	0.30	147.00
12/29/23	CALHOUN	ANALYZING DISCOVERY DOCUMENTS SUBMITTED BY DEBTORS	1.40	889.00
Total Hours and Fees			95.20	86,554.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	22.50 hours at	1,000.00	22,500.00
JESSICA N. MEYERS	1.50 hours at	1,005.00	1,507.50
MEGHAN MCCAFFERTY	9.10 hours at	890.00	8,099.00
ERIC R. GOODMAN	25.50 hours at	1,325.00	33,787.50
BRITTANY E. VEILLEUX	17.80 hours at	490.00	8,722.00
ETHAN H. CALHOUN	18.80 hours at	635.00	11,938.00
Total Fees			86,554.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: PLAN AND DISCLOSURE STATEMENT

INVOICE

For professional services rendered in connection with the above captioned matter through December 31, 2023:

Matter No.	Matter Name	Fees	Costs	Total
040178.0014	PLAN AND DISCLOSURE STATEMENT	4,087.50	0.00	4,087.50
	Total	4,087.50	0.00	4,087.50

Total Current Fees	\$4,087.50
Total Current Costs	\$0.00
Total Invoice	\$4,087.50

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
January 19, 2024Invoice 6972596
Page 18

RE: PLAN AND DISCLOSURE STATEMENT

TIME DETAIL

Date	Professional	Description	Hours	Value
12/06/23	CICERO	REVIEW DISCLOSURE STATEMENT	2.50	2,500.00
12/11/23	CALHOUN	ANALYZING DEBTORS SECOND AMENDED DISCLOSURE STATEMENT	2.50	1,587.50
Total Hours and Fees			5.00	4,087.50

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	2.50 hours at	1,000.00	2,500.00
ETHAN H. CALHOUN	2.50 hours at	635.00	1,587.50
Total Fees			4,087.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: MEDIATION/SETTLEMENT

I N V O I C E

For professional services rendered in connection with the above captioned matter through December 31, 2023:

Matter No.	Matter Name	Fees	Costs	Total
040178.0015	MEDIATION/SETTLEMENT	31,750.00	0.00	31,750.00
Total		31,750.00	0.00	31,750.00

Total Current Fees	\$31,750.00
Total Current Costs	\$0.00
Total Invoice	\$31,750.00

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
January 19, 2024Invoice 6972596
Page 20

RE: MEDIATION/SETTLEMENT

TIME DETAIL

Date	Professional	Description	Hours	Value
12/11/23	CICERO	CASE RESEARCH AND DEVELOP PLEADING AHEAD OF MEDIATION	9.00	9,000.00
12/14/23	CICERO	ATTEND MEDIATION AT NORTON ROSE FULBRIGHT	9.50	9,500.00
12/14/23	GOODMAN	PLAN AND PREPARE FOR MEDIATION IN NEW YORK (1.0); ATTEND MEDIATION PROCEEDING IN NEW YORK REGARDING PLAN PROPOSAL (9.0)	10.00	13,250.00
Total Hours and Fees			28.50	31,750.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	18.50 hours at	1,000.00	18,500.00
ERIC R. GOODMAN	10.00 hours at	1,325.00	13,250.00
Total Fees			31,750.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: COURT ATTENDANCE

INVOICE

For professional services rendered in connection with the above captioned matter through December 31, 2023:

Matter No.	Matter Name	Fees	Costs	Total
040178.0016	COURT ATTENDANCE	1,500.00	0.00	1,500.00
	Total	1,500.00	0.00	1,500.00

Total Current Fees	\$1,500.00
Total Current Costs	\$0.00
Total Invoice	\$1,500.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 January 19, 2024

Invoice 6972596
 Page 22

RE: COURT ATTENDANCE

TIME DETAIL

Date	Professional	Description	Hours	Value
12/06/23	CICERO	PREPARE FOR AND ATTEND TEHUM STATUS CONFERENCE	1.50	1,500.00
Total Hours and Fees			1.50	1,500.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	1.50 hours at	1,000.00	1,500.00
Total Fees			1,500.00

INCLUDES ONLY TIME AND COSTS TO DATE
 KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT
 PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

brownrudnick

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6972596
Date Jan 19, 2024
Client 040178

RE: TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Remittance **remit**

Balance Due: \$115,000.67

To ensure proper credit to your account, please include this page with your payment.

Remittance Address

Brown Rudnick LLP
P.O. Box 23079
New York, NY 10087-3079

Wire Instructions

JP Morgan Chase
270 Park Avenue
New York, NY 10017
ABA Number: 021000021
SWIFT Code: CHASUS33

For Credit To

Brown Rudnick LLP Deposit Account
Account Number: 760367067

Exhibit B

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

In re: TEHUM CARE SERVICES, INC., ¹ <p style="text-align: center;">Debtor.</p>	Chapter 11 Case No. 23-90086 (CML)
---	---

**SECOND MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP FOR
 COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
 EXPENSES AS CO-COUNSEL TO THE OFFICIAL COMMITTEE
 OF TORT CLAIMANTS FOR THE PERIOD FROM
JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Brown Rudnick LLP
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 22, 2023 [ECF No. 1294]
Time Period Covered:	January 1, 2024 – January 31, 2024
Total Fees Sought:	\$553,835.50
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$546,549.50
Total professional hours covered by this statement:	440.70
Average hourly rate for professionals:	\$1,240.18

¹ The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.



Total paraprofessional fees covered by this statement:	\$7,286.00
Total paraprofessional hours covered by this statement:	14.5
Average hourly rate for paraprofessionals:	\$502.48
Reimbursable expenses sought in this statement:	\$8,311.30
Payment requested:	
80% Fees	\$443,068.40
100% Expenses	\$8,311.30
Total:	\$451,379.70

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Brown Rudnick LLP as Co-Counsel for the Official Committee of Tort Claimants as of November 22, 2023 [ECF No. 1294], the law firm of Brown Rudnick LLP (“Brown Rudnick”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this Second Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from January 1, 2024 to January 31, 2024 (the “Second Monthly Fee Statement”). By the Second Monthly Fee Statement and pursuant to the Interim Compensation Order, Brown Rudnick seeks interim payment of (i) \$443,068.40 (80% of \$553,835.50) as compensation for professional services rendered to the Committee and (ii) \$8,311.30 for reimbursement of actual and necessary expenses, for a total of \$451,379.70 for

the period January 1, 2024 through and including January 31, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this First Monthly Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Second Monthly Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Brown Rudnick partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Brown Rudnick established in accordance with its internal billing procedures. As reflected in Exhibit A, Brown Rudnick incurred \$553,835.50 in fees during the Fee Period. Pursuant to this Second Monthly Fee Statement, Brown Rudnick seeks compensation in the amount of \$443,068.40 or 80% of such fees

Exhibit B is a schedule providing certain information regarding the Brown Rudnick attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Second Monthly Fee Statement. Attorneys and paraprofessionals of Brown Rudnick expended a total of 455.2 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this Second Monthly Fee Statement. This Second Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$8,311.30.

Exhibit D consists of Brown Rudnick’s detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Brown Rudnick has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Second Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Brown Rudnick reserves the right to seek payment

of such fees and expenses not included herein. Subsequent monthly fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Brown Rudnick respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$451,379.70, consisting of (i) \$443,068.40, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Brown Rudnick, and (ii) \$8,311.30, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: February 28, 2024
New York, NY

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Eric R. Goodman

David J. Molton (*pro hac vice*)

Eric R. Goodman (*pro hac vice*)

Gerard T. Cicero (*pro hac vice*)

Seven Times Square

New York, NY 10036

Telephone: (212) 209-4800

Facsimile: (212) 209-4801

Email: dmolton@brownrudnick.com

egoodman@brownrudnick.com

gcicero@brownrudnick.com

CERTIFICATE OF SERVICE

I certify that on February 28, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Eric R. Goodman
Eric R. Goodman

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

FEE APPLICATION DATA

2/23/2024



CLIENT: 040178

1

Bill Date range: 2/20/2024 to 2/20/2024

CLNT MATT CODE	MATTER NAME	ID	EMPLOYEE NAME	BASE HRS	BASE AMT	BILLED HRS	BILLED AMT
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	2655	MOLTON, DAVID J.	1.50	3,375.00	1.50	\$3,375.00
		4435	GOODMAN, ERIC R.	5.20	8,320.00	5.20	\$8,320.00
		4598	REYES, MADELINE, P.	0.00	0.00	0.00	\$0.00
		4621	RIZKALLA, ANDREW	0.00	0.00	0.00	\$0.00
		4749	BURNS, THOMAS	3.60	1,800.00	3.60	\$1,800.00
		4768	CALHOUN, ETHAN H.	0.30	208.50	0.30	\$193.50
					10.60	13,703.50	10.60
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMM	2655	MOLTON, DAVID J.	0.80	1,800.00	0.80	\$1,800.00
		3660	CICERO, GERARD T.	3.90	5,850.00	3.80	\$5,700.00
		4435	GOODMAN, ERIC R.	4.40	7,040.00	4.40	\$7,040.00
				9.10	14,690.00	9.00	\$14,540.00
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-C	3660	CICERO, GERARD T.	2.40	3,600.00	2.40	\$3,600.00
		4368	SIEGER-GRIMM, SUSAN	4.30	5,160.00	4.30	\$5,160.00
		4435	GOODMAN, ERIC R.	4.90	7,840.00	4.90	\$7,840.00
		4598	REYES, MADELINE, P.	0.20	129.00	0.20	\$129.00
		4768	CALHOUN, ETHAN H.	4.30	2,988.50	4.30	\$2,953.50
		16.10	19,717.50	16.10	\$19,682.50		
040178.0008	FEE/EMPLOYMENT APPLICATIONS	3660	CICERO, GERARD T.	0.60	900.00	0.60	\$900.00
		4621	RIZKALLA, ANDREW	0.40	310.00	0.00	\$0.00
		4749	BURNS, THOMAS	4.20	2,100.00	2.80	\$1,400.00
		4768	CALHOUN, ETHAN H.	4.40	3,058.00	4.40	\$2,943.00
		9.60	6,368.00	7.80	\$5,243.00		
040178.0010		0325	JONAS, JEFFREY L.	0.40	900.00	0.00	\$0.00
		1164	VLACHOS, HELEN	1.80	801.00	1.80	\$801.00
		2655	MOLTON, DAVID J.	8.00	18,000.00	8.00	\$18,000.00
		3660	CICERO, GERARD T.	42.90	64,350.00	42.90	\$64,350.00
		3663	MEYERS, JESSICA N.	37.50	39,750.00	37.50	\$39,750.00

FEE APPLICATION DATA

2/23/2024



CLIENT: 040178

1

Bill Date range: 2/20/2024 to 2/20/2024

		3863	MOXLEY, D. CAMERON	94.90	118,625.00	94.90	\$118,625.00
		4034	KERNS, DANIEL F.	5.80	5,597.00	5.80	\$5,597.00
	CONTESTED MATTERS/LITIGATION (GENERAL)	4114	COHEN, HARRIET E.	0.40	200.00	0.40	\$200.00
		4146	MCCAFFERTY, MEGHAN	16.90	16,055.00	16.90	\$16,055.00
		4368	SIEGER-GRIMM, SUSAN	1.20	1,440.00	1.20	\$1,440.00
		4435	GOODMAN, ERIC R.	76.10	121,760.00	76.10	\$121,760.00
		4473	VEILLEUX, BRITTANY E.	3.20	1,648.00	3.20	\$1,648.00
		4595	CASTANO, ELIZABETH, C.	0.60	387.00	0.60	\$387.00
		4598	REYES, MADELINE, P.	5.50	3,547.50	5.50	\$3,547.50
		4749	BURNS, THOMAS	2.10	1,050.00	2.10	\$1,050.00
		4768	CALHOUN, ETHAN H.	64.70	44,966.50	64.70	\$44,481.50
				362.00	439,077.00	361.60	\$437,692.00
040178.0011	NON-WORKING TRAVEL @ 50%	3863	MOXLEY, D. CAMERON	10.50	6,562.50	10.50	\$6,562.50
				10.50	6,562.50	10.50	\$6,562.50
040178.0013	CLAIMS ADMINISTRATION AND OBJECTIONS	4435	GOODMAN, ERIC R.	0.50	800.00	0.50	\$800.00
				0.50	800.00	0.50	\$800.00
040178.0014	PLAN AND DISCLOSURE STATEMENT	4368	SIEGER-GRIMM, SUSAN	2.50	3,000.00	2.50	\$3,000.00
		4435	GOODMAN, ERIC R.	0.70	1,120.00	0.70	\$1,120.00
				3.20	4,120.00	3.20	\$4,120.00
040178.0015	MEDIATION/SETTLEMENT	4768	CALHOUN, ETHAN H.	2.80	1,946.00	2.80	\$1,946.00
				2.80	1,946.00	2.80	\$1,946.00
040178.0016	COURT ATTENDANCE	2655	MOLTON, DAVID J.	0.80	1,800.00	0.80	\$1,800.00
		4435	GOODMAN, ERIC R.	2.00	3,007.50	2.00	\$3,007.50
		4768	CALHOUN, ETHAN H.	1.00	695.00	1.00	\$695.00
				3.80	5,502.50	3.80	\$5,502.50
040178.0017	DISMISSAL/TRUSTEE/EXAMINER MATTERS	2655	MOLTON, DAVID J.	2.50	5,625.00	2.50	\$5,625.00
		3660	CICERO, GERARD T.	22.30	33,450.00	22.30	\$33,450.00
		4368	SIEGER-GRIMM, SUSAN	2.60	3,120.00	2.60	\$3,120.00

FEE APPLICATION DATA

2/23/2024



CLIENT: 040178

1

Bill Date range: 2/20/2024 to 2/20/2024

		4435	GOODMAN, ERIC R.	0.60	960.00	0.60	\$960.00
				28.00	43,155.00	28.00	\$43,155.00
040178.0018	FINANCING ISSUES	4768	CALHOUN, ETHAN H.	1.30	903.50	1.30	\$903.50
				1.30	903.50	1.30	\$903.50
				457.50	556,545.50	455.20	\$553,835.50

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

SUMMARY OF TIME & COMPENSATION

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
David J. Molton	Partner; Admitted to New York Bar in 1983; Admitted to New Jersey Bar in 1990; Admitted to California Bar in 2009; Dispute Resolution & Restructuring	\$2,250	13.60	\$30,600.00
Eric R. Goodman	Partner; Admitted to Ohio Bar in 2003; Admitted to New York Bar in 2018; Admitted to Illinois Bar in 2020; Admitted to District Court of Columbia Bar in 2021; Admitted to Massachusetts Bar in 2021; Dispute Resolution & Restructuring	\$1,600	94.40	\$150,847.50
Gerard T. Cicero	Partner; Admitted to New Jersey Bar in 2015; Admitted to New York Bar in 2016; Dispute Resolution & Restructuring	\$1,500	72.00	\$108,000.00
D. Cameron Moxley	Partner; Admitted to New York Bar in 2005; Admitted to Connecticut Bar in 2022; Dispute Resolution & Restructuring	\$1,250	105.40	\$125,187.50
Susan Sieger-Grimm	Counsel; Admitted to Virginia Bar in 1994; Admitted to New York Bar 1997; Dispute Resolution & Restructuring	\$1,200	10.60	12,720.00
Jessica N. Meyers	Partner; Admitted in Massachusetts Bar in 2015; Admitted to New York Bar in 2017;	\$1,060	37.50	\$39,750.00

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
	Dispute Resolution & Restructuring			
Daniel F. Kerns	Associate; Admitted to the New York Bar in 2019; Dispute Resolution & Restructuring	\$965	5.80	\$5,597.00
Meghan McCafferty	Associate; Admitted to Massachusetts Bar in 2019; Dispute Resolution & Restructuring	\$950	16.90	\$16,055.00
Ethan H. Calhoun	Associate; Admitted to Alabama Bar in 2021; Admitted to New York Bar in 2023; Dispute Resolution & Restructuring	\$695	78.80	\$54,116.00
Madeline P. Reyes	Associate; Admitted to the New York Bar in 2024	\$645	5.70	\$3,676.50
TOTAL			440.70	\$546,549.50
PROFESSIONAL BLENDED RATE		\$1,240.18		

COMPENSATION BY PARAPROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
Elizabeth C. Castano	Law Clerk	\$645	.60	\$387.00
Brittany E. Veilleux	Litigation Technology Specialist	\$515	3.20	\$1,648.00
Harriet E. Cohen	Paralegal; Bankruptcy & Corporate Restructuring	\$500	.40	\$200.00
Thomas Burns	Paralegal; Bankruptcy & Corporate Restructuring	\$500	8.5	\$4,250.00
Helen Vlachos	Manager of Research Services	\$445	1.80	\$801.00
TOTAL			14.5	\$7,286.00
PARAPROFESSIONAL BLENDED RATE		\$502.48		

EXHIBIT C

Record of Expenses

BILLED DISBURSEMENTS

Client: TEHUM CARE SERVICES, INC., OFFICIAL TORT (040178)

Amounts shown in USD

BILL NUM	BILL DATE	CLIENT NAME	COST DESC	HARD/SOFT	BASE AMT	BILLED AMT
6973791	2/20/2024	TEHUM CARE SERVICES, INC., OFFICIAL TORT	Copies	S	1.20	1.20
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Document Production	S	141.00	0.00
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	eDiscovery Hosting	S	2,230.40	2,230.40
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Pacer	S	10.70	10.70
		TEHUM CARE SERVICES, INC., OFFICIAL TORT	Westlaw Online Transactional Searches / Docs	S	6,069.00	6,069.00
Total					8,452.30	8,311.30

EXHIBIT D

Detailed Record of Time Entries



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	13,688.50	8,311.30	21,999.80
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	14,540.00	0.00	14,540.00
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	19,682.50	0.00	19,682.50
040178.0008	FEE/EMPLOYMENT APPLICATIONS	5,243.00	0.00	5,243.00
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	437,692.00	0.00	437,692.00
040178.0011	NON-WORKING TRAVEL @ 50%	6,562.50	0.00	6,562.50
040178.0013	CLAIMS ADMINISTRATION AND OBJECTIONS	800.00	0.00	800.00
040178.0014	PLAN AND DISCLOSURE STATEMENT	4,120.00	0.00	4,120.00
040178.0015	MEDIATION/SETTLEMENT	1,946.00	0.00	1,946.00
040178.0016	COURT ATTENDANCE	5,502.50	0.00	5,502.50
040178.0017	DISMISSAL/TRUSTEE/EXAMINER MATTERS	43,155.00	0.00	43,155.00
040178.0018	FINANCING ISSUES	903.50	0.00	903.50
	Total	553,835.50	8,311.30	562,146.80

Total Current Fees	\$553,835.50
20% Holdback Amount	(110,767.10)
80% CURRENT BALANCE DUE	\$443,068.40
Total Current Costs	\$8,311.30
Total Invoice	\$451,379.70



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: CASE ADMINISTRATION/DISBURSEMENTS

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	13,688.50	8,311.30	21,999.80
	Total	13,688.50	8,311.30	21,999.80

Total Current Fees	\$13,688.50
Total Current Costs	\$8,311.30
Total Invoice	\$21,999.80



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 3

RE: CASE ADMINISTRATION/DISBURSEMENTS

TIME DETAIL

Date	Professional	Description	Hours	Value
01/16/24	MOLTON	PREPARE FOR WEEKLY COMMITTEE CALL RE CASE STATUS AND ACTION ITEMS (.5); PARTICIPATE IN WEEKLY COMMITTEE CALL RE CASE STATUS AND ACTION ITEMS (1.0)	0.50	1,125.00
01/16/24	MOLTON	PARTICIPATE IN WEEKLY COMMITTEE CALL RE CASE STATUS AND ACTION ITEMS	1.00	2,250.00
01/16/24	BURNS	ATTENTION TO THE CREATION OF FEE MATTERS FOR TIME KEEPING PURPOSES	0.20	100.00
01/18/24	CALHOUN	COORDINATING ADDITIONAL PRO HAC VICE FILINGS	0.30	193.50
01/22/24	GOODMAN	CONFERENCE CALL WITH LITIGATION TEAM REGARDING DISCOVERY AND RELATED MATTERS (.5); EDIT AND REVISE OBJECTION TO MOTION TO EXTEND EXCLUSIVE PERIODS (.5); REVIEW DEBTOR'S AND UCC'S DISCOVERY REQUESTS (.5); TELEPHONE CALL WITH MR. MOXLEY REGARDING DISCOVERY REQUESTS (.4); ATTEND MEET AND CONFER WITH THE DEBTOR AND THE UCC (.5); CONFERENCE CALL WITH THE UST REGARDING MOTION TO DISMISS (.5); TELEPHONE CALL WITH MR. MOXLEY REGARDING DISCOVERY SCHEDULE (.3); BEGIN DRAFTING RESPONSES TO REQUESTS FOR ADMISSION (2.0).	5.20	8,320.00
01/23/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1). PREPARING AND FILING PRO HAC VICE MOTIONS FOR J. MEYERS AND C. MOXLEY (.6). PREPARING FOR FILING AND FILING EMERGENCY MOTION FOR STATUS CONFERENCE (.4)	1.20	600.00
01/25/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.30	150.00
01/26/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	100.00
01/29/24	BURNS	PREPARING FOR FILING AND THE ELECTRONIC FILING OF LETTER REGARDING STATUS CONFERENCE	0.40	200.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 4

Date	Professional	Description	Hours	Value
01/30/24	BURNS	REVIEW AND ANALYZE DOCKET(.1) , CIRCULATE RECENT PERTINENT ENTRIES (.1). PREPARE FOR FILING AND ELECTRONICALLY FILE FIRST FEE APPLICATION (.4). PREPARE AND ELECTRONICALLY FILE NOTICE OF JANUARY 31, 2024 STATUS CONFERENCE (.5)	1.10	550.00
01/31/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	100.00
Total Hours and Fees			10.60	13,688.50

TIME SUMMARY

Professional	Hours	Rate	Value
DAVID J. MOLTON	1.50 hours at	2,250.00	3,375.00
ERIC R. GOODMAN	5.20 hours at	1,600.00	8,320.00
THOMAS BURNS	3.60 hours at	500.00	1,800.00
ETHAN H. CALHOUN	0.30 hours at	645.00	193.50
Total Fees			13,688.50

COST SUMMARY

Description	Value
DOCUMENT PRODUCTION	0.00
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	6,069.00
PACER	10.70
EDISCOVERY HOSTING	2,230.40
COPIES	1.20
Total Costs	8,311.30



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	14,540.00	0.00	14,540.00
	Total	14,540.00	0.00	14,540.00

Total Current Fees	\$14,540.00
Total Current Costs	\$0.00
Total Invoice	\$14,540.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 6

RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

TIME DETAIL

Date	Professional	Description	Hours	Value
01/05/24	CICERO	PARTICIPATE IN MEETING WITH LAWYERS FOR COMMITTEE MEMBERS RE: CASE LITIGATION STRATEGY	1.30	1,950.00
01/05/24	GOODMAN	CONFERENCE CALL WITH THE TCC REGARDING MOTION TO DISMISS	1.10	1,760.00
01/09/24	CICERO	PARTICIPATE IN WEEKLY UPDATE AND STRATEGY CALL	0.90	1,350.00
01/09/24	MOLTON	PARTICIPATE IN WEEKLY COMMITTEE CALL RE CASE STATUS AND ACTION ITEMS	0.80	1,800.00
01/09/24	GOODMAN	CONFERENCE CALL WITH THE TCC REGARDING CASE STATUS AND MOTION TO DISMISS	0.90	1,440.00
01/16/24	CICERO	PARTICIPATE IN WEEKLY COMMITTEE MEETING	1.00	1,500.00
01/16/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE AND STATE COURT COUNSEL REGARDING CASE STATUS AND MOTION TO DISMISS	1.00	1,600.00
01/17/24	GOODMAN	CONFERENCE CALL WITH COUNSEL FOR CLAIMANT REGARDING MOTION TO DISMISS	0.30	480.00
01/17/24	CICERO	CALL WITH K&E RE: PRO BONO CLIENT AND TEHUM CASE STATUS	0.60	900.00
01/23/24	GOODMAN	ATTEND MEETING WITH TCC REGARDING CASE STATUS, DISCOVERY, AND MOTION TO DISMISS	0.60	960.00
01/30/24	GOODMAN	ATTEND MEETING WITH THE TCC REGARDING CASE STATUS	0.50	800.00
Total Hours and Fees			9.00	14,540.00

TIME SUMMARY

Professional	Hours	Rate	Value
DAVID J. MOLTON	0.80 hours at	2,250.00	1,800.00
GERARD T. CICERO	3.80 hours at	1,500.00	5,700.00
ERIC R. GOODMAN	4.40 hours at	1,600.00	7,040.00
Total Fees			14,540.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	19,682.50	0.00	19,682.50
	Total	19,682.50	0.00	19,682.50

Total Current Fees	\$19,682.50
Total Current Costs	\$0.00
Total Invoice	\$19,682.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 8

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

TIME DETAIL

Date	Professional	Description	Hours	Value
01/02/24	REYES	CORRESPONDING WITH J. MEYERS ON CASE BACKGROUND AND STRATEGY	0.20	129.00
01/05/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS AND MOTION TO DISMISS	0.20	320.00
01/05/24	CALHOUN	STRATEGIZING WITH CO-COUNSEL REGARDING SUBPOENAS OF DEPOSITIONS, NOTICES OF DEPOSITIONS, AND OTHER DISCOVERY MATTERS	0.30	208.50
01/08/24	GOODMAN	FOLLOW UP CALL WITH MR. ZIMMERMAN REGARDING MOTION TO DISMISS	0.20	320.00
01/09/24	CICERO	CALL WITH CO-COUNSEL AND FINANCIAL ADVISOR RE: CASE STRATEGY AND 9019 MOTION	1.40	2,100.00
01/16/24	CALHOUN	STRATEGIZING RESPONSE TO 9019 MOTION WITH CO-COUNSEL	0.50	347.50
01/17/24	CALHOUN	STRATEGIZING ARGUMENTS FOR OBJECTION TO DEBTOR'S 9019 MOTION WITH CO-COUNSEL	0.20	129.00
01/17/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS	0.50	800.00
01/18/24	CALHOUN	STRATEGIZING DISCOVERY OBJECTIVES, TIMELINES, AND DEPOSITIONS WITH CO-COUNSEL	0.50	322.50
01/19/24	GOODMAN	CONFERENCE CALL WITH PROVINCE REGARDING RULE 9019 SETTLEMENT (.5); CONFERENCE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS (.5)	1.00	1,600.00
01/19/24	CICERO	PARTICIPATE IN CALL WITH FINANCIAL ADVISOR RE: LITIGATION AND PREPARATION THEREFORE	1.00	1,500.00
01/22/24	SIEGER-GRIMM	DISCUSSION OF NEXT STEPS RE: DISCOVERY (.5)	0.50	600.00
01/22/24	CALHOUN	STRATEGIZING OBJECTIVES AND APPROACHES FOR UPCOMING MEET AND CONFER WITH OPPOSING COUNSEL REGARDING DISCOVERY RELATED MATTERS.	0.50	347.50
01/22/24	CALHOUN	ANALYZING DISCOVERY DOCUMENTS FROM THE VARIOUS PRODUCTIONS.	1.80	1,251.00
01/22/24	GOODMAN	CONFERENCE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS	0.50	800.00
01/23/24	GOODMAN	COMMUNICATIONS WITH CO-COUNSEL REGARDING DISCOVERY ISSUES	1.50	2,400.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 9

Date	Professional	Description	Hours	Value
01/23/24	SIEGER-GRIMM	STRATEGY DISCUSSION (.5); REVIEW DRAFT CORRESPONDENCE WITH COUNSEL FOR DEBTOR AND UCC AND PROVIDE COMMENTS (.7); REVIEW DRAFT EMERGENCY MOTION FOR STATUS CONFERENCE (.3); REVIEW ONGOING CORRESPONDENCE WITH DEBTOR'S COUNSEL RE: EMERGENCY STATUS CONFERENCE (.4); DISCUSSION RE: LEFKOWITZ CALL AND DISCOVERY ISSUES (.5)	2.40	2,880.00
01/23/24	CALHOUN	STRATEGIZING WITH CO-COUNSEL CONCERNING DISCOVERY RELATED MATTERS AND RESPONSES.	0.50	347.50
01/24/24	GOODMAN	COMMUNICATIONS WITH CO-COUNSEL REGARDING DISCOVERY REQUESTS	1.00	1,600.00
01/26/24	SIEGER-GRIMM	TEAM MEETING RE: NEXT STEPS (1.4)	1.40	1,680.00
Total Hours and Fees			16.10	19,682.50

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	2.40 hours at	1,500.00	3,600.00
SUSAN SIEGER-GRIMM	4.30 hours at	1,200.00	5,160.00
ERIC R. GOODMAN	4.90 hours at	1,600.00	7,840.00
MADELINE P. REYES	0.20 hours at	645.00	129.00
ETHAN H. CALHOUN	3.60 hours at	695.00	2,502.00
ETHAN H. CALHOUN	0.70 hours at	645.00	451.50
Total Fees			19,682.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: FEE/EMPLOYMENT APPLICATIONS

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0008	FEE/EMPLOYMENT APPLICATIONS	5,243.00	0.00	5,243.00
Total		5,243.00	0.00	5,243.00

Total Current Fees	\$5,243.00
Total Current Costs	\$0.00
Total Invoice	\$5,243.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 11

RE: FEE/EMPLOYMENT APPLICATIONS

TIME DETAIL

Date	Professional	Description	Hours	Value
01/16/24	CALHOUN	ANALYZING TEHUM DOCKET FILINGS RELATED TO FEE STATEMENTS AND APPLICATIONS FOR FEES AND EXPENSES	0.60	417.00
01/17/24	CALHOUN	COORDINATING FEE STATEMENT RELATED MATTERS	0.50	322.50
01/17/24	CALHOUN	DRAFTING MONTHLY FEE STATEMENT	1.40	903.00
01/17/24	BURNS	FURTHER ATTENTION TO FEE MATTER CREATION FOR TIME KEEPING PURPOSES	0.20	100.00
01/18/24	CALHOUN	COORDINATING/DRAFTING MONTHLY FEE APPLICATION	0.40	258.00
01/22/24	BURNS	WORK ON INITIAL FEE STATEMENT	0.70	350.00
01/24/24	CALHOUN	INCORPORATING FINAL EDITS ALONG WITH EXHIBITS INTO FINAL DRAFT OF MONTHLY FEE APPLICATION.	1.20	834.00
01/24/24	BURNS	FURTHER WORK ON FIRST FEE APPLICATION	1.10	550.00
01/25/24	BURNS	WORK ON FIRST MONTHLY FEE APPLICATION	0.40	200.00
01/29/24	BURNS	FURTHER WORK ON FIRST FEE STATEMENT	0.40	200.00
01/30/24	CICERO	FINALIZE FIRST FEE STATEMENT FOR FILING	0.60	900.00
01/30/24	CALHOUN	FINALIZING DECEMBER FEE STATEMENT/COORDINATING FILING OF FEE STATEMENT.	0.30	208.50
Total Hours and Fees			7.80	5,243.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	0.60 hours at	1,500.00	900.00
THOMAS BURNS	2.80 hours at	500.00	1,400.00
ETHAN H. CALHOUN	2.10 hours at	695.00	1,459.50
ETHAN H. CALHOUN	2.30 hours at	645.00	1,483.50
Total Fees			5,243.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE

Invoice 6973791
 Date Feb 20, 2024
 Client 040178

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	437,692.00	0.00	437,692.00
	Total	437,692.00	0.00	437,692.00

Total Current Fees	\$437,692.00
Total Current Costs	\$0.00
Total Invoice	\$437,692.00

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024Invoice 6973791
Page 13

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

TIME DETAIL

Date	Professional	Description	Hours	Value
01/02/24	CALHOUN	ANALYZING DISCOVERY DOCUMENTS SUBMITTED BY DEBTORS	0.30	208.50
01/02/24	CALHOUN	ANALYZING REQUIREMENTS FOR FILING DOCUMENTS UNDER SEAL AND PURSUANT TO THE PROTECTIVE ORDER IN THE CASE	0.60	417.00
01/02/24	CALHOUN	REVISING POTENTIAL DRAFT OF MOTION TO DISMISS CASE	0.70	486.50
01/02/24	MEYERS	ATTEND INTERNAL CALL TO DISCUSS CASE BACKGROUND AND PREPARATION OF DEPOSITION NOTICES AND SUBPOENAS	0.50	530.00
01/03/24	REYES	MEET WITH TEAM TO DISCUSS DEPOSITION PREPARATION	1.10	709.50
01/03/24	REYES	BEGIN RESEARCH AND REVIEW OF SUBPOENAS AND NOTICE OF DEPOSITIONS	0.30	193.50
01/03/24	CALHOUN	ANALYZING DISCOVERY DOCUMENTS SUBMITTED BY DEBTOR	0.20	139.00
01/03/24	CALHOUN	STRATEGIZING TEHUM DISCOVERY/DEPOSITIONS/SUBPOENAS WITH CO-COUNSEL	1.20	834.00
01/03/24	CALHOUN	ANALYZING COURT FILINGS RELATED TO PRIOR SUBPOENAED PARTIES IN THE CASE	1.30	903.50
01/03/24	CALHOUN	ANALYZING FEDERAL RULES OF PROCEDURE, FEDERAL RULES OF BANKRUPTCY PROCEDURE, AND LOCAL BANKRUPTCY RULES RELATED TO SUBPOENAS AND DEPOSITION REQUESTS	0.60	417.00
01/03/24	MEYERS	ATTEND INTERNAL MEETING TO DISCUSS CASE BACKGROUND, DEPOSITION SUBPOENAS, AND DEPOSITION STRATEGIES; COLLECT DEPOSITION NOTICES AND SUBPOENAS TO USE AS TEMPLATES	1.50	1,590.00
01/04/24	REYES	REVIEW MTD, CASE LAW, AND RULES RELEVANT TO SUBMITTING DOCUMENTS FOR DEPOSITION AND FILL THEM OUT (1.8); CORRESPOND WITH E. CALHOUN REGARDING CASE AND RESEARCH (.5)	2.30	1,483.50
01/04/24	CALHOUN	ANALYZING DISCOVERY DOCUMENTS SUBMITTED BY DEBTORS AND STRATEGIZING APPROACH RELATED TO DEFICIENCIES IN DEBTORS' DISCOVERY FILES	0.80	556.00
01/04/24	CALHOUN	STRATEGIZING APPROACH TO NOTICE OF AND SUBPOENA SUBMISSIONS RELATED TO POTENTIAL DEPOSITIONS WITH CO-COUNSEL	0.90	625.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 14

Date	Professional	Description	Hours	Value
01/04/24	CALHOUN	ANALYZING DRAFT SUBPOENAS AND NOTICES OF DEPOSITIONS FOR COMPLIANCE WITH FEDERAL RULES OF CIVIL PROCEDURE, FEDERAL RULES OF BANKRUPTCY PROCEDURE, AND LOCAL RULES	0.80	556.00
01/04/24	CALHOUN	ANALYZING PRIOR DOCKET ENTRIES RELATED TO SUBPOENAS FILED IN THE CASE AND SUBSEQUENT MOTIONS TO COMPEL COMPLIANCE, WITNESS AND EXHIBIT LISTS FILED, AND PRIOR DEPOSITIONS FILED IN CONNECTION WITH DRAFT OF NEW SUBPOENAS AND NOTICES OF DEPOSITIONS	0.90	625.50
01/04/24	CALHOUN	REVISING DRAFT SUBPOENAS AND NOTICES OF DEPOSITIONS	0.40	278.00
01/04/24	MEYERS	DISCUSS ACTION ITEMS RELATED TO SUBPOENAS AND ANTICIPATED CONTESTED MATTERS WITH NEW TEAM MEMBER	0.20	212.00
01/04/24	KERNS	REVIEW MOTION FOR DISMISSAL (.7); RESEARCH RE MATTER WITH AIMS TO ASSIST WITH DISCOVERY (1.3)	2.00	1,930.00
01/04/24	VEILLEUX	CONFER WITH CASE TEAM REGARDING INCOMING DATA DEFICIENCIES	0.20	103.00
01/05/24	REYES	CORRESPOND WITH E. CALHOUN REGARDING REVISION OF DOCUMENTS AND CONTINUED RESEARCH (.3); MEETING WITH D. KERNS, J. MEYERS, AND E. CALHOUN TO DISCUSS PACKAGE AND NEXT STEPS (.3); WORK ON REVISING NOTICES (.6)	1.20	774.00
01/05/24	CALHOUN	DRAFTING/REVISING NOTICES OF DEPOSITIONS	1.50	1,042.50
01/05/24	CALHOUN	ANALYZING FEDERAL PROCEDURAL RULES, FEDERAL BANKRUPTCY RULES, AND LOCAL RULES RELATED TO NOTICES OF SUBPOENAS FOR DEPOSITIONS	0.50	347.50
01/05/24	CALHOUN	DRAFTING NOTICES OF SUBPOENA OF DEPOSITIONS	1.10	764.50
01/05/24	CALHOUN	ASSESSING THE RELEVANT SERVICE ADDRESSES OF VARIOUS PARTIES IN CONNECTION TO NOTICES OF DEPOSITIONS AND SUBPOENAS OF DEPOSITIONS	0.50	347.50
01/05/24	CALHOUN	INCORPORATING THE ACCEPTANCE OF SERVICE ADDRESSES OF THE RELEVANT PARTIES INTO THE DRAFT NOTICES OF DEPOSITIONS	0.30	208.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 15

Date	Professional	Description	Hours	Value
01/05/24	CALHOUN	COORDINATING AND EVALUATING OPTIONS RELATED TO THE LOCATIONS FOR CONDUCTING DEPOSITIONS AND OTHER RELATED LOGISTICAL MATTERS	0.80	556.00
01/05/24	CALHOUN	INCORPORATING SUGGESTED REVISIONS INTO NOTICE OF DEPOSITIONS	0.30	208.50
01/05/24	CICERO	COMMUNICATIONS WITH LITIGATION TEAM RE: SUBPOENAS AND DISCOVERY PLAN (.9); REVIEW DOCUMENTS FOR PREPARATION OF DEPOSITION TOPICS FOR 30(B)(6) WITNESSES (2.6)	3.50	5,250.00
01/05/24	MEYERS	ATTEND INTERNAL CALL TO DISCUSS PREPARATION OF DEPOSITION NOTICES AND SUBPOENAS; REVIEW AND PROPOSE REVISIONS TO DRAFT DEPOSITION NOTICES AND SUBPOENAS	1.00	1,060.00
01/05/24	KERNS	REVISE DISCOVERY REQUESTS (2.1); CONFER WITH MEYERS, J. & REYES, M. RE SAME (.4)	2.50	2,412.50
01/06/24	CALHOUN	ANALYZING DISCOVERY DOCUMENTS SUBMITTED BY DEBTORS AND COORDINATING WITH FINANCIAL ADVISORS RELATED TO DISCOVERY DOCUMENTS	0.60	417.00
01/08/24	REYES	REVISE AND EDIT NOTICES OF DEPOSITION AND SUBPOENAS	0.60	387.00
01/08/24	GOODMAN	EDIT AND REVISE MOTION TO DISMISS	0.60	960.00
01/08/24	CALHOUN	IMPLEMENTING FINAL EDITS TO DRAFT SUBPOENAS AND NOTICES OF DEPOSITIONS	0.20	139.00
01/08/24	MEYERS	REVIEW AND REVISE DEPOSITION NOTICES AND SUBPOENAS	0.30	318.00
01/08/24	KERNS	REVIEW DRAFT DISCOVERY PACKAGE	0.90	868.50
01/09/24	GOODMAN	EDIT AND REVISE MOTION TO DISMISS (2.1); FURTHER REVIEW OF CASE LAW IN SUPPORT OF MOTION TO DISMISS (.8); CONFERENCE CALL WITH MR. MOXLEY REGARDING DISCOVERY FOR RULE 9019 MOTION (.9); TELEPHONE CALL WITH MS. MCCAFFERTY REGARDING OBJECTION TO RULE 9019 MOTION (.1); DRAFT OUTLINE FOR OBJECTION RULE 9019 MOTION (3.9); TELEPHONE CALL WITH PROVINCE REGARDING RULE 9019 SETTLEMENT (1.2)	9.00	14,400.00
01/09/24	MCCAFFERTY	RESEARCH IN SUPPORT OF [REDACTED] ARGUMENT FOR MOTION TO DISMISS	0.30	285.00
01/09/24	CALHOUN	EVALUATING POTENTIAL MOTION TO DISMISS AND COMPLIANCE WITH RELATED REQUIREMENTS IN PROTECTIVE ORDER	0.50	347.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 16

Date	Professional	Description	Hours	Value
01/09/24	MOXLEY	CONFER WITH E. GOODMAN RE CASE STRATEGY AND DISCOVERY ISSUES AND PREPARE DRAFT DISCOVERY	1.60	2,000.00
01/10/24	GOODMAN	DRAFT AND EDIT OBJECTION TO MOTION TO EXTEND EXCLUSIVE PERIODS (1.7); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING MOTION TO DISMISS AND RELATED MATTERS (.9)	2.60	4,160.00
01/10/24	MOXLEY	DRAFT DEPOSITION NOTICES AND REQUESTS FOR PRODUCTION TO DEBTOR AND THE UCC	0.80	1,000.00
01/11/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR OBJECTION TO RULE 9019 SETTLEMENT (1.4); FURTHER RESEARCH IN SUPPORT OF OBJECTION TO RULE 9019 SETTLEMENT (1.0); EDIT AND REVISE MOTION TO DISMISS (.3)	2.70	4,320.00
01/11/24	MEYERS	REVIEW CORRESPONDENCE CONCERNING MOTION TO DISMISS AND DISCOVERY REQUESTS	0.10	106.00
01/11/24	MOXLEY	DRAFT DISCOVERY TO DEBTOR, UCC, AND YESCARE IN CONNECTION WITH ANTICIPATED CONTESTED RULE 9019 MOTION	3.80	4,750.00
01/11/24	CICERO	REVIEW AND DRAFT MOTION TO DISMISS (1.9); REVIEW AND DRAFT MOTION TO TERMINATE EXCLUSIVITY (1.2); RESEARCH RELATED TO SAME (.4)	3.50	5,250.00
01/12/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR OBJECTION TO RULE 9019 MOTION (3.1); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING MOTION TO DISMISS (.4); FURTHER REVISIONS TO MOTION TO DISMISS (.6)	4.10	6,560.00
01/12/24	VLACHOS	RESEARCH INDIVIDUAL TO DETERMINE RESIDENTIAL AND BUSINESS ADDRESSES	1.80	801.00
01/12/24	KERNS	REVIEW DISCOVERY DRAFTS	0.40	386.00
01/12/24	CALHOUN	STRATEGIZING WITH TEAM ON DISCOVERY DOCUMENTS	0.40	278.00
01/12/24	CALHOUN	REVIEWING FILINGS AND EXHIBITS IN PREPARATION FOR DRAFTING PROPERLY TAILORED RFPS	2.50	1,737.50
01/12/24	CALHOUN	ANALYZING THE POTENTIAL SERVICE ADDRESS LOCATIONS FOR VARIOUS PARTIES	0.80	556.00
01/12/24	CALHOUN	EVALUATING COURT ORDERS WITH RESPECT TO CONFIDENTIAL DOCUMENTS AND IMPLEMENTING EDITS IN COMPLIANCE THEREWITH	0.30	208.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 17

Date	Professional	Description	Hours	Value
01/12/24	CALHOUN	EVALUATING MOT. TO INCLUDE THE MEMBER CLASS OF INCARCERATED CREDITORS IN THE ENTIRETY OF THE PROCEEDINGS	0.30	208.50
01/12/24	CALHOUN	COMPILING DOCKET AND EXHIBIT FILINGS IN PREPARATION FOR DRAFTING PROPERLY TAILORED RFPS	0.70	486.50
01/12/24	MOXLEY	REVISE DRAFT DISCOVERY IN CONNECTION WITH ANTICIPATED RULE 9019 MOTION AND CONFER WITH E. CALHOUN AND RESEARCH TEAM RE THE SAME	1.00	1,250.00
01/15/24	GOODMAN	TELEPHONE CALL WITH MR. MOXLEY REGARDING DISCOVERY ISSUES	0.30	480.00
01/15/24	MCCAFFERTY	RESEARCH AND ANALYZE ARGUMENT FOR RESPONSE TO 9019 MOTION REGARDING [REDACTED]	1.30	1,235.00
01/15/24	MOXLEY	CONFER WITH E. GOODMAN REGARDING POTENTIAL REQUESTS FOR ADMISSION TO DEBTORS AND UCC IN CONNECTION WITH ANTICIPATED RULE 9019 MOTION	0.30	375.00
01/16/24	CICERO	WORK ON FINALIZING MOTION TO DISMISS (3.5); REVIEW 9019 FILING AND ANALYSIS RE: SAME (1.4)	4.90	7,350.00
01/16/24	GOODMAN	EDIT AND REVISE MOTION TO DISMISS (1.3); TELEPHONE CALL WITH MS. MCCAFFERTY REGARDING FIFTH AMENDMENT RESEARCH (.3); CONFERENCE CALL WITH LITIGATION TEAM REGARDING UPCOMING HEARINGS AND DISCOVERY (.5); FINALIZE MOTION TO DISMISS (1.7); REVIEW 9019 MOTION (.3); EDIT AND REVISE OUTLINE FOR OBJECTION TO RULE 9019 MOTION (1.0); TELEPHONE CALL WITH MS. MEYERS REGARDING DEPOSITION SCHEDULE (.3); DRAFT AND EDIT DISCOVERY REQUESTS (.5); TELEPHONE WITH MR. MOLTON REGARDING MOTION TO DISMISS (.5)	6.40	10,240.00
01/16/24	MCCAFFERTY	RESEARCH AND ANALYZE ARGUMENT ON [REDACTED] FOR OPPOSITION TO 9019 MOTION (2.5); IDENTIFY AND SUMMARIZE CASE LAW IN SUPPORT OF OPPOSITION TO 9019 MOTION ARGUMENT ON [REDACTED] (2.8); RESEARCH CASE LAW IN SUPPORT OF 9019 OPPOSITION ARGUMENT REGARDING [REDACTED] (1.1)	6.40	6,080.00
01/16/24	MEYERS	DISCUSS STRATEGY FOR LEFKOWITZ DEPOSITION AND CROSS EXAMINATION; REVIEW RULE 9019 MOTION	1.20	1,272.00
01/16/24	MOLTON	REVIEW DEBTOR'S/UCC'S 9019 SETTLEMENT MOTION	1.10	2,475.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 19

Date	Professional	Description	Hours	Value
01/18/24	GOODMAN	EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (3.8); FURTHER REVIEW OF CASE LAW IN SUPPORT OF OBJECTION TO RULE 9019 MOTION (1.5); CONFERENCE CALL WITH TRIAL TEAM REGARDING PREPARATION FOR HEARING (.6); TELEPHONE CALL WITH MR. CICERO REGARDING CASE STATUS AND OBJECTION TO RULE 9019 MOTION (.4)	6.30	10,080.00
01/18/24	CALHOUN	DRAFTING/REVISING SECTION RELATED TO 9019 MOTION STANDARDS IN OBJECTION TO DEBTOR'S 9019 MOTION	1.40	903.00
01/18/24	CALHOUN	FINALIZING DEPOSITION NOTICES, DEPOSITION SUBPOENAS, PRODUCTION SUBPOENAS, PRODUCTION NOTICES, DEPOSITION TOPICS, INTERROGATORIES, AND REQUESTS FOR ADMISSION	2.80	1,806.00
01/18/24	CALHOUN	ANALYZING DOCUMENT PRODUCTIONS, EXHIBITS FILED ON DOCKET, AND CREATING LITIGATION MATERIALS	1.20	774.00
01/18/24	CALHOUN	REVIEWING EXHIBITS AND OTHER DISCOVERY MATERIAL IN RELATION TO DISCOVERY REQUESTS AND PROPER NOTICE TO PARTIES	0.40	258.00
01/18/24	MEYERS	ATTEND TEAM MEETING TO DISCUSS DISCOVERY AND DEPOSITION STRATEGY; COLLECT BACKGROUND MATERIALS TO PREPARE FOR LEFKOWITZ DEPOSITION; REVIEW AND ORGANIZE DISCOVERY TO DEBTORS, UCC, M2 AND LEFKOWITZ	1.20	1,272.00
01/18/24	MOXLEY	FINALIZE DISCOVERY (DOCUMENT REQUESTS, REQUESTS FOR ADMISSION, INTERROGATORIES, AND DEPOSITION NOTICES) IN CONNECTION WITH RULE 9019 MOTION TO DEBTOR, UCC, YESCARE, M2, AND I. LEFKOWITZ	4.60	5,750.00
01/19/24	MCCAFFERTY	REVISE OPPOSITION TO 9019 MOTION (.2)	0.20	190.00
01/19/24	COHEN	MEETING WITH MESSRS. MOXLEY AND CALHOUN (.1); RESEARCH AND COMPILER FORMS FOR DISCOVERY FILING (.3)	0.40	200.00
01/19/24	CALHOUN	STRATEGIZING/COORDINATING DISCOVERY, SUBPOENAS, AND NOTICES WITH CO-COUNSEL.	0.30	208.50
01/19/24	CALHOUN	REVISING NOTICE OF DISCOVERY OF DOCUMENTS FILING/COORDINATING FILING.	1.00	695.00
01/19/24	CALHOUN	FINALIZING/EDITING SUBPOENAS TO YESCARE AND LEFKOWITZ AND OTHER ATTACHMENTS.	0.80	556.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 20

Date	Professional	Description	Hours	Value
01/19/24	CALHOUN	REVIEWING DISCOVERY DOCUMENTS AND EXHIBITS FILED ON DOCKET IN PREPARATION FOR DEPOSITIONS OF VARIOUS PARTIES.	2.50	1,737.50
01/19/24	MEYERS	REVIEW AND PROVIDE COMMENTS ON PRO HAC FORM; COLLECT AND ORGANIZE BACKGROUND MATERIALS FOR LEFKOWITZ DEPOSITION; DISCUSS STATUS OF DISCOVERY EFFORTS AND EFFORTS TO ENFORCE SUBPOENAS.	0.50	530.00
01/19/24	BURNS	DRAFTING NOTICE OF DISCOVERY REQUESTS (.5). ELECTRONIC FILING OF NOTICE OF DISCOVERY REQUESTS (.4). DRAFTING PRO HAC VICE MOTIONS FOR C. MOXLEY AND J. MEYERS (.4)	1.30	650.00
01/19/24	MOXLEY	PREPARE FOR MEET AND CONFER WITH THE DEBTOR, UCC, YESCARE, AND M2 RE TCC'S DISCOVERY IN CONNECTION WITH THE RULE 9019 MOTION AND FOR DEPOSITIONS OF DEBTOR AND UCC	1.90	2,375.00
01/20/24	MEYERS	[REDACTED] IN PREPARATION FOR LEFKOWITZ DEPOSITION.	4.20	4,452.00
01/20/24	MOXLEY	REVIEW [REDACTED] AND PREPARE FOR DEPOSITIONS OF UCC AND DEBTOR IN CONNECTION WITH TCC'S RULE 9019 MOTION DISCOVERY	3.20	4,000.00
01/21/24	MOXLEY	ANALYZE [REDACTED] IN PREPARATION FOR DEPOSITIONS OF DEBTOR AND UCC AND PREPARE FOR MEET AND CONFER ON TCC'S RULE 9019 DISCOVERY	4.00	5,000.00
01/22/24	CICERO	PARTICIPATE IN MEET AND CONFER (1.0); REVIEW M2LOAN CO. DOCUMENT TOPICS PER MEET AND CONFER (1.2)	2.10	3,150.00
01/22/24	MOXLEY	DRAFT EMERGENCY MOTION FOR STATUS CONFERENCE RE SCHEDULING ISSUES IN CONNECTION WITH RULE 9019 MOTION AND MOTION TO DISMISS (3.0); LEAD FOR THE TCC MEET AND CONFER WITH DEBTOR, UCC, AND M2 (1.0); PREPARE FOR AND FOLLOW-UP REGARDING DISCOVERY MEET AND CONFER AND CALLS WITH E. GOODMAN RE THE SAME (2.4)	6.40	8,000.00
01/22/24	MOLTON	PREPARE FOR AND PARTICIPATE IN DISCOVERY PREP CALL RE MTD	0.80	1,800.00
01/22/24	MOLTON	REVIEW DRAFT MOTION TO VACATE EXCLUSIVITY	0.70	1,575.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 21

Date	Professional	Description	Hours	Value
01/22/24	CICERO	PARTICIPATE IN LITIGATION STRATEGY AND DISCOVERY STRATEGY CALL (1.0); REVIEW MEET AND CONFER STRATEGY OUTLINE (.5)	1.50	2,250.00
01/23/24	CICERO	VARIOUS CALLS AND EMAILS RE: MEET AND CONFER RESULTS (2.5); DRAFT AND REVISE EMERGENCY MOTION AND COMMUNICATIONS RELATED THERETO (4.5); REFIN M2 LOAN CO. TOPICS PER REQUEST FROM M2 LOAN CO (1.6)	8.60	12,900.00
01/23/24	CALHOUN	ANALYZING FILINGS IN THE CASE RELATED TO SERVICE AND OTHER PROCEDURES.	0.40	278.00
01/23/24	CALHOUN	ANALYZING FEDERAL RULES OF BANKRUPTCY PROCEDURE, LOCAL RULES, AND COMPLEX CASE PROCEDURES RELATED TO SERVICE AND NOTICE OF DOCUMENTS.	0.70	486.50
01/23/24	CALHOUN	EVALUATING CERTIFICATES OF SERVICES AND RELATED COMPLIANCE WITH BANKRUPTCY AND LOCAL PROCEDURAL RULES.	0.20	139.00
01/23/24	CALHOUN	ANALYZING DISCOVERY DOCUMENTS FROM THE VARIOUS PRODUCTIONS.	2.70	1,876.50
01/23/24	MEYERS	ATTEND INTERNAL CONFERENCE CALLS TO DISCUSS MOTION FOR STATUS CONFERENCE, PLANNED DISCOVERY AND HEARING SCHEDULE, AND LETTER CONCERNING LEFKOWITZ PHONE CALL; REVIEW CORRESPONDENCE WITH OPPOSING COUNSEL CONCERNING MOTION FOR STATUS CONFERENCE; REVIEW AND PROPOSE REVISIONS TO LETTER CONCERNING LEFKOWITZ PHONE CALL.	1.70	1,802.00
01/23/24	MOLTON	ATTENTION TO RESPONSE TO 9019 MOTION AND PREPARATION FOR OBJECTION	0.80	1,800.00
01/23/24	MOLTON	COMMUNICATE WITH TEAM RE C MOXLEY COMMUNICATION WITH LEFKOWITZ RE THREATS MADE TO C MOXLEY AND RESPONSE RE STATUS CONFERENCE MOTION AND DISCOVERY RE 9019 MOTION AND MTD	0.60	1,350.00
01/23/24	MOLTON	REVIEW AND EDIT LETTER TO PARTIES AND UST RE RE C MOXLEY COMMUNICATION WITH LEFKOWITZ RE THREATS MADE TO C MOXLEY AND RESPONSE RE STATUS CONFERENCE MOTION AND DISCOVERY RE 9019 MOTION AND MTD	0.30	675.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 22

Date	Professional	Description	Hours	Value
01/23/24	MOXLEY	ADDRESS ISSUES CONCERNING EMERGENCY MOTION FOR STATUS CONFERENCE (0.6); PARTICIPATE IN CALL WITH COMMITTEE REGARDING CASE STATUS AND STRATEGY ISSUES (1.0); CALL WITH I. LEFKOWITZ RE SUBPOENA TO HIM AND TCC MOTION FOR STATUS CONFERENCE (0.1); CONFER WITH TEAM REGARDING ISSUES RELATED TO I. LEFKOWITZ DISCOVERY AND EMERGENCY MOTION FOR CONFERENCE AND DRAFT LETTER TO DEBTOR AND UCC CONCERNING THE SAME (4.0); ATTENTION TO PREPARING FOR DEPOSITIONS AND DISCOVERY ISSUES (3.0)	8.70	10,875.00
01/23/24	GOODMAN	DRAFT AND EDIT RESPONSES TO THE DEBTOR'S DISCOVERY REQUESTS	6.20	9,920.00
01/24/24	GOODMAN	REVIEW DEBTOR'S RESPONSE TO MOTION FOR STATUS CONFERENCE (.3); DRAFT AND EDIT REPLY IN SUPPORT OF MOTION FOR STATUS CONFERENCE (.8); DRAFT AND EDIT RESPONSES TO THE DEBTOR'S DISCOVERY REQUESTS (3.0); DRAFT AND EDIT RESPONSES TO THE UCC'S DISCOVERY REQUESTS (2.8)	6.60	10,560.00
01/24/24	CALHOUN	EVALUATING DEBTOR'S VARIOUS INTERIM FINANCING ORDERS AND POTENTIAL OBJECTION THERETO.	1.20	834.00
01/24/24	CALHOUN	COORDINATING SERVICE OF PROCESS TO LEFKOWITZ AND PROVIDING RELEVANT INFORMATION TO PROCESS SERVER.	0.80	556.00
01/24/24	CALHOUN	RESEARCHING/ANALYZING FILINGS IN TEHUM COURT DOCKET, DISCOVERY MATERIALS, PROCEDURAL REQUIREMENTS, AND OTHER RELEVANT MATERIALS RELATED TO SERVICE OF PROCESS TO LEFKOWITZ	1.90	1,320.50
01/24/24	CALHOUN	DRAFTING SUMMARY ANALYSIS OF FILINGS IN TEHUM COURT DOCKET, DISCOVERY MATERIALS, PROCEDURAL REQUIREMENTS, AND OTHER RELEVANT MATERIALS RELATED TO SERVICE OF PROCESS TO LEFKOWITZ	1.10	764.50
01/24/24	CALHOUN	ANALYZING/SUMMARIZING DEBTOR AND COMMITTEE'S JOINT RESPONSE TO THE MOTION OF THE TORT CLAIMANTS COMMITTEE FOR A STATUS CONFERENCE; JOINDER TO THE TORT CLAIMANTS MOTION; AND ARIZONA DEPARTMENT OF CORRECTIONS FILINGS.	1.20	834.00

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024Invoice 6973791
Page 23

Date	Professional	Description	Hours	Value
01/24/24	MEYERS	REVIEW AZ DOC JOINDER TO REQUEST FOR STATUS CONFERENCE; REVIEW BACKGROUND MATERIALS RELATED TO LEFKOWITZ'S PRIOR EFFORTS TO AVOID SERVICE.	0.40	424.00
01/24/24	MOXLEY	ANALYZE DEBTOR'S AND UCC'S RESPONSE TO MOTION FOR EMERGENCY STATUS CONFERENCE AND REVISE TCC'S REPLY IN FURTHER SUPPORT OF EMERGENCY MOTION FOR STATUS CONFERENCE AND CONFER WITH TEAM RE THE SAME (2.0); ANALYZE PRIOR CASES CONCERNING SERVICE OF PROCESS ON I. LEFKOWITZ AND CONFER WITH TEAM REGARDING THE SAME (1.4); ATTENTION TO RESPONSES TO DISCOVERY SERVED BY THE DEBTOR AND UCC ON THE TCC AND COUNSEL (1.0)	4.40	5,500.00
01/25/24	GOODMAN	DRAFT AND EDIT RESPONSES TO DEBTOR'S REQUESTS FOR PRODUCTION (2.0); DRAFT AND EDIT RESPONSES TO UCC'S REQUESTS FOR PRODUCTION (2.0); TELEPHONE CALL WITH MR. MOXLEY REGARDING DISCOVERY AND CASE STATUS (.6); REVIEW JOINDER IN SUPPORT OF STATUS CONFERENCE MOTION AND EXHIBITS (.4).	5.00	8,000.00
01/25/24	CALHOUN	ANALYZING/RESEARCHING CASES AND RELATED MATERIALS RELEVANT TO POTENTIAL DIP OBJECTION	1.40	973.00
01/25/24	CALHOUN	ANALYZING DISCOVERY PRODUCTION OF OVER 200,000 DOCUMENTS SUBMITTED BY M2LOANCO; DEBTOR; AND GENEVA	2.70	1,876.50
01/25/24	CALHOUN	COORDINATING SERVICE OF PROCESS/SUBPOENA ON LEFTKOWITZ.	0.60	417.00
01/25/24	CALHOUN	ANALYZING CASE LAW RELATED TO SUBPOENAS AND SERVICE OF PROCESS.	0.70	486.50
01/25/24	MEYERS	REVIEW ADDITIONAL JOINDER TO TCC MOTION FOR STATUS CONFERENCE; REVIEW [REDACTED]	1.50	1,590.00
01/25/24	MOXLEY	REVISE DRAFT RESPONSES AND OBJECTIONS TO DISCOVERY REQUESTS DIRECTED TO THE TCC AND DRAFT SUPPLEMENTAL DISCOVERY REQUESTS TO THE DEBTOR AND UCC	4.40	5,500.00
01/26/24	GOODMAN	DRAFT OUTLINE FOR LEFKOWITZ DEPOSITION (1.5); CONFERENCE CALL WITH LITIGATION TEAM REGARDING DEPOSITIONS AND CASE STATUS (1.5); EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (2.5); EDIT AND REVISE DISCOVERY RESPONSES (1.0)	6.50	10,400.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 24

Date	Professional	Description	Hours	Value
01/26/24	CALHOUN	COORDINATING SERVICE OF SUBPOENA WITH PROCESS SERVER.	0.40	278.00
01/26/24	MOXLEY	REVISE DRAFT RESPONSES AND OBJECTIONS TO DEBTOR'S AND UCC'S DISCOVERY TO TCC (REQUESTS FOR ADMISSION, INTERROGATORIES, DOCUMENT REQUESTS) AND DRAFT RESPONSE TO 30(B)(6) NOTICE TO TCC (10.0); CONFER WITH E. GOODMAN AND TEAM RE DEPOSITION STRATEGY AND PREPARATION (1.5)	11.50	14,375.00
01/26/24	MEYERS	ATTEND INTERNAL CONFERENCE CALL TO DISCUSS LEFKOWITZ DEPOSITION TOPICS; REVIEW CORRESPONDENCE CONCERNING SERVICE OF LEFKOWITZ; CORRESPOND INTERNALLY AND WITH PROCESS SERVER CONCERNING SERVICE EFFORTS; PROPOSED E-MAIL TO LEFKOWITZ CONCERNING SERVICE AND DEPOSITION AND IMPLEMENT REVISIONS TO SAME; EMAIL LEFKOWITZ CONCERNING SERVICE AND DEPOSITION.	2.30	2,438.00
01/26/24	MOLTON	REVIEW DISCOVERY ISSUES RE LEFKOWITZ DEPOSITION	1.20	2,700.00
01/26/24	BURNS	CREATE AND ELECTRONICALLY FILE NOTICE OF DISCOVERY	0.50	250.00
01/27/24	GOODMAN	EDIT AND REVISE OBJECTION TO EXCLUSIVITY MOTION.	1.40	2,240.00
01/27/24	MOXLEY	CALLS WITH E. GOODMAN REGARDING STATUS OF DISCOVERY RESPONSES AND RELATED ISSUES (0.6); EMAILS WITH I. LEFKOWITZ AND COUNSEL TO YESCARE CORP. RE SUBPOENAS AND DRAFT LETTER TO COURT UPDATING THE COURT AS TO DISCOVERY STATUS AND MODIFIED SCHEDULING PROPOSAL IN LIGHT OF THE DISCOVERY DEVELOPMENTS (7.0)	7.60	9,500.00
01/27/24	MEYERS	REVIEW CORRESPONDENCE CONCERNING LEFKOWITZ SERVICE AND DEPOSITION.	0.20	212.00
01/28/24	GOODMAN	EDIT AND REVISE LETTER TO COURT REGARDING DISCOVERY ISSUES (.5); EDIT AND REVISE DISCOVERY RESPONSES (1.4); TELEPHONE CALL WITH MR. MOXLEY REGARDING DISCOVERY ISSUES AND CASE STATUS (.4).	2.30	3,680.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 25

Date	Professional	Description	Hours	Value
01/28/24	MEYERS	REVIEW LEFKOWITZ 2004 EXAMINATIONS, MATERIALS RELATED TO [REDACTED], AND MOTION TO COMPEL DISCOVERY FROM M2 LOANCO TO PREPARE FOR LEFKOWITZ DEPOSITION; REVIEW AND ORGANIZE MATERIALS [REDACTED] IN PREPARATION FOR LEFKOWITZ DEPOSITION; REVIEW LEFKOWITZ TRANSCRIPTS AND AFFIDAVITS TO CONFIRM ACCURACY OF SERVICE ADDRESS; REVISE DRAFT LETTER TO COURT CONCERNING REQUESTED STATUS CONFERENCE AND OBSTRUCTIONS TO DISCOVERY EFFORTS.	6.60	6,996.00
01/28/24	MOXLEY	REVISE DRAFT LETTER TO COURT WITH UPDATE ON DISCOVERY DEVELOPMENTS AND CHANGED TCC POSITION ON SCHEDULING PROPOSAL AND CALLS WITH D. MOLTON, E. GOODMAN, AND J. MEYERS AND EMAILS WITH TEAM RE THE SAME	4.00	5,000.00
01/28/24	CALHOUN	REVIEWING/SUMMARIZING DOCUMENTS RELATED TO DISCOVERY AND HISTORY OF CASE FOR LETTER TO COURT.	1.30	903.50
01/29/24	CASTANO	RESEARCHING AND ANALYZING VARIOUS DOCUMENTS FROM SIMILAR CASES FOR G. CICERO.	0.60	387.00
01/29/24	VEILLEUX	QUERY DATABASE PER CASE TEAM SPECIFICATIONS AND REPORT FINDINGS (.4)	0.40	206.00
01/29/24	MEYERS	REVIEW BACKGROUND MATERIALS FOR LEFKOWITZ DEPOSITION AND DRAFT DEPOSITION OUTLINE; ATTEND INTERNAL CALL CONCERNING DISCOVERY AND HEARING SCHEDULE AND RESPONSE TO OPPOSING COUNSEL REGARDING THE SAME; REVIEW AND IMPLEMENT REVISIONS TO DRAFT CORRESPONDENCE TO OPPOSING COUNSEL CONCERNING DISCOVERY EFFORTS.	4.70	4,982.00
01/29/24	GOODMAN	CONFERENCE CALL WITH BROWN RUDNICK TEAM REGARDING DISCOVERY SCHEDULE AND RELATED MATTERS (.8); REVIEW AND EDIT RESPONSE TO DEBTOR'S EMAIL REGARDING DISCOVERY SCHEDULE (.2).	1.00	1,600.00
01/29/24	CALHOUN	ANALYZING CASES RELATED TO PERSONAL SERVICE OF SUBPOENAS IN RELATION TO SERVICE OF LEFKOWITZ.	0.80	556.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 26

Date	Professional	Description	Hours	Value
01/29/24	CALHOUN	COORDINATING WITH PROCESS SERVER RELATED TO SERVICE OF SUBPOENA ON LEFKOWITZ,, ANALYZING AFFIDAVIT, AND REVIEWING OTHER POTENTIAL EVIDENCE PROVIDED BY PROCESS SERVER.	0.50	347.50
01/29/24	MOXLEY	ADDRESS AFFIRMATIVE AND DEFENSIVE DISCOVERY ISSUES IN CONNECTION WITH RULE 9019 MOTION AND MOTION TO DISMISS	3.20	4,000.00
01/30/24	GOODMAN	CONFERENCE CALL WITH JOINDER PARTIES REGARDING STATUS CONFERENCE (.6); EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (1.5); FURTHER RESEARCH IN SUPPORT OF OBJECTION TO RULE 9019 MOTION (1.0).	3.10	4,960.00
01/30/24	MOLTON	REVIEW STATUS RE ISSUES TO BE RAISED AT STATUS CONFERENCE SCHEDULED FOR 31 JANUARY	1.50	3,375.00
01/30/24	CALHOUN	ANALYZING DISCOVERY PRODUCTIONS SUBMITTED BY VARIOUS PARTIES IN THE CASE.	1.90	1,320.50
01/30/24	MCCAFFERTY	RESEARCH [REDACTED] [REDACTED] (2.0)	2.00	1,900.00
01/30/24	SIEGER-GRIMM	REVIEW HEARING OUTLINE AND PROVIDE COMMENTS (.3)	0.30	360.00
01/30/24	CALHOUN	REVIEWING NEW PRODUCTION FROM YESCARE	1.90	1,320.50
01/30/24	MEYERS	REVIEW JOINDERS TO MOTION TO DISMISS; REVIEW LEFKOWITZ TRANSCRIPTS AND IDENTIFY AND SUMMARIZE [REDACTED] [REDACTED] [REDACTED]; REVIEW INTERNAL CORRESPONDENCE CONCERNING DISCOVERY SCHEDULE, RECENT PRODUCTION, AND STATUS CONFERENCE.	3.50	3,710.00
01/30/24	CALHOUN	REVIEWING OUTLINE OF 1/31 STATUS CONFERENCE	0.30	208.50
01/30/24	MOXLEY	PREPARE FOR STATUS CONFERENCE (6.1) AND CONFER WITH CLAIMANTS' COUNSEL AND OTHER INTERESTED PARTIES RE THE SAME (1.0)	7.10	8,875.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 27

Date	Professional	Description	Hours	Value
01/31/24	GOODMAN	EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (3.1); TELEPHONE CALL WITH MR. MOXLEY IN PREPARATION FOR HEARING ON STATUS CONFERENCE MOTION (.2); POST-HEARING CALL WITH BROWN RUDNICK TEAM (1.0); POST-HEARING CALL WITH MR. MOXLEY REGARDING (.3); ATTEND PREPARATION SESSION WITH TCC'S RULE 30(B)(6) WITNESS (.4).	5.00	8,000.00
01/31/24	VEILLEUX	ORGANIZE AND PREPARE ELECTRONIC DATA FOR INCLUSION INTO REVIEW DATABASE PER CASE TEAM SPECIFICATIONS (.2); LOAD DATA SET TO DATABASE FOR CASE TEAM ACCESS (2.3); QUERY DATABASE PER CASE TEAM SPECIFICATIONS AND REPORT FINDINGS (.1)	2.60	1,339.00
01/31/24	CALHOUN	EVALUATING NEW YESCARE PRODUCTIONS SUBMITTED PRIOR TO HEARING AND DRAFTING PERIODICAL ANALYSIS.	2.20	1,529.00
01/31/24	CALHOUN	ANALYZING DISCOVERY PRODUCTION SUBMITTED BY YESCARE AND COORDINATING WITH FINANCIAL ADVISORS REGARDING EVALUATION OF FINANCIAL RELATED DISCOVERY DOCUMENTS.	1.80	1,251.00
01/31/24	CALHOUN	COORDINATING DEPOSITION LOGISTICS/SCHEDULING WITH CO-COUNSEL AND COURT REPORTER.	1.00	695.00
01/31/24	SIEGER-GRIMM	OBSERVE STATUS CONFERENCE RE: NEXT STEPS (.9)	0.90	1,080.00
01/31/24	MEYERS	ATTEND COURT CONFERENCE AND INTERNAL DEBRIEFING THEREAFTER; DRAFT OUTLINE FOR LEFKOWITZ DEPOSITION; REVIEW PROPOSED CORRESPONDENCE REGARDING DEPOSITION LOGISTICS; REVIEW INTERNAL COMMUNICATIONS CONCERNING SUBPOENA TO FIRM AND COORDINATE PREPARATION OF MOTION TO QUASH.	5.80	6,148.00
01/31/24	MOXLEY	PREPARE FOR STATUS CONFERENCE HEARING (3.0); APPEAR AND ARGUE STATUS CONFERENCE (1.0); FOLLOW-UP WITH M. ZIMMERMAN, AND BR TEAM RE STRATEGY, TRIAL PREPARATION, DEPOSITION PREPARATION AND OTHER ISSUES IN LIGHT OF STATUS CONFERENCE DISCUSSION AND FOLLOW UP WITH DEBTOR AND UCC COUNSEL RE SCHEDULE (4.0)	7.00	8,750.00
01/31/24	CICERO	ATTEND COURT HEARING (.6); PREPARE FOR SAME (1.2); PREPARE FOR DEPOSITIONS (2.2)	4.00	6,000.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 28

Date	Professional	Description	Hours	Value
01/31/24	BURNS	ARRANGED FOR SERVICE OF SUBPOENA ON YESCARE CORP	0.30	150.00
01/31/24	MCCAFFERTY	RESEARCH [REDACTED] [REDACTED] (3.0); DRAFT SUMMARY OF ARGUMENT ON [REDACTED] [REDACTED] (1.6)	4.60	4,370.00
Total Hours and Fees			361.60	437,692.00

TIME SUMMARY

Professional	Hours	Rate	Value
HELEN VLACHOS	1.80 hours at	445.00	801.00
DAVID J. MOLTON	8.00 hours at	2,250.00	18,000.00
GERARD T. CICERO	42.90 hours at	1,500.00	64,350.00
JESSICA N. MEYERS	37.50 hours at	1,060.00	39,750.00
D. C. MOXLEY	94.90 hours at	1,250.00	118,625.00
DANIEL F. KERNS	5.80 hours at	965.00	5,597.00
HARRIET E. COHEN	0.40 hours at	500.00	200.00
MEGHAN MCCAFFERTY	16.90 hours at	950.00	16,055.00
SUSAN SIEGER-GRIMM	1.20 hours at	1,200.00	1,440.00
ERIC R. GOODMAN	76.10 hours at	1,600.00	121,760.00
BRITTANY E. VEILLEUX	3.20 hours at	515.00	1,648.00
ELIZABETH C. CASTANO	0.60 hours at	645.00	387.00
MADELINE P. REYES	5.50 hours at	645.00	3,547.50
THOMAS BURNS	2.10 hours at	500.00	1,050.00
ETHAN H. CALHOUN	55.00 hours at	695.00	38,225.00
ETHAN H. CALHOUN	9.70 hours at	645.00	6,256.50
Total Fees			437,692.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: NON-WORKING TRAVEL @ 50%

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0011	NON-WORKING TRAVEL @ 50%	6,562.50	0.00	6,562.50
	Total	6,562.50	0.00	6,562.50

Total Current Fees	\$6,562.50
Total Current Costs	\$0.00
Total Invoice	\$6,562.50

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024Invoice 6973791
Page 30

RE: NON-WORKING TRAVEL @ 50%

TIME DETAIL

Date	Professional	Description	Hours	Value
01/30/24	MOXLEY	TRAVEL TO HOUSTON, TX FOR STATUS CONFERENCE WITH COURT	5.60	3,500.00
01/31/24	MOXLEY	TRAVEL FROM STATUS CONFERENCE HEARING IN HOUSTON, TX	4.90	3,062.50
Total Hours and Fees			10.50	6,562.50

TIME SUMMARY

Professional	Hours	Rate	Value
D. C. MOXLEY	10.50 hours at	625.00	6,562.50
Total Fees			6,562.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: CLAIMS ADMINISTRATION AND OBJECTIONS

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0013	CLAIMS ADMINISTRATION AND OBJECTIONS	800.00	0.00	800.00
	Total	800.00	0.00	800.00

Total Current Fees	\$800.00
Total Current Costs	\$0.00
Total Invoice	\$800.00

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024Invoice 6973791
Page 32

RE: CLAIMS ADMINISTRATION AND OBJECTIONS

TIME DETAIL

Date	Professional	Description	Hours	Value
01/26/24	GOODMAN	CONFERENCE CALL WITH MR. ATKINSON REGARDING CLAIM ANALYSIS	0.50	800.00
Total Hours and Fees			0.50	800.00

TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	0.50 hours at	1,600.00	800.00
Total Fees			800.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: PLAN AND DISCLOSURE STATEMENT

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0014	PLAN AND DISCLOSURE STATEMENT	4,120.00	0.00	4,120.00
Total		4,120.00	0.00	4,120.00

Total Current Fees	\$4,120.00
Total Current Costs	\$0.00
Total Invoice	\$4,120.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 34

RE: PLAN AND DISCLOSURE STATEMENT

TIME DETAIL

Date	Professional	Description	Hours	Value
01/24/24	GOODMAN	FURTHER REVIEW OF SETTLEMENT AGREEMENT AND CHAPTER 11 PLAN	0.70	1,120.00
01/29/24	SIEGER-GRIMM	REVIEW PROPOSED PLAN RE: [REDACTED] (1.6); SUMMARY EMAIL RE: SAME (.3)	1.90	2,280.00
01/29/24	SIEGER-GRIMM	RESEARCH RE: [REDACTED] (.6)	0.60	720.00
Total Hours and Fees			3.20	4,120.00

TIME SUMMARY

Professional	Hours	Rate	Value
SUSAN SIEGER-GRIMM	2.50 hours at	1,200.00	3,000.00
ERIC R. GOODMAN	0.70 hours at	1,600.00	1,120.00
Total Fees			4,120.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: MEDIATION/SETTLEMENT

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0015	MEDIATION/SETTLEMENT	1,946.00	0.00	1,946.00
	Total	1,946.00	0.00	1,946.00

Total Current Fees	\$1,946.00
Total Current Costs	\$0.00
Total Invoice	\$1,946.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 36

RE: MEDIATION/SETTLEMENT

TIME DETAIL

Date	Professional	Description	Hours	Value
01/16/24	CALHOUN	ANALYZING JOINT MOTION FOR ENTRY OF AN ORDER AUTHORIZING AND APPROVING THE SETTLEMENT B/W DEBTOR, UCC, AND PARTIES TO SETTLEMENT FILED AT D.I. 1259 (1.0); EVALUATING CASES IN FIFTH CIRCUIT AND SUPREME COURT RELATED TO STANDARDS APPLIED TO 9019 MOTIONS (INCLUDING 365) (1.8)	2.80	1,946.00
Total Hours and Fees			2.80	1,946.00

TIME SUMMARY

Professional	Hours	Rate	Value
ETHAN H. CALHOUN	2.80 hours at	695.00	1,946.00
Total Fees			1,946.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: COURT ATTENDANCE

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0016	COURT ATTENDANCE	5,502.50	0.00	5,502.50
	Total	5,502.50	0.00	5,502.50

Total Current Fees	\$5,502.50
Total Current Costs	\$0.00
Total Invoice	\$5,502.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 38

RE: COURT ATTENDANCE

TIME DETAIL

Date	Professional	Description	Hours	Value
12/18/23	GOODMAN	CONFERENCE WITH MR. ZIMMERMAN REGARDING STATUS CONFERENCE (.4); ATTEND STATUS CONFERENCE BEFORE THE BANKRUPTCY COURT (.3)	0.70	927.50
01/16/24	GOODMAN	ATTEND STATUS CONFERENCE WITH THE COURT AND HEARING ON MOTION FOR RELIEF FROM STAY	0.30	480.00
01/31/24	CALHOUN	ATTENDING 1/31 EMERGENCY STATUS CONFERENCE REGARDING DISCOVERY AND 9019 MOTION.	1.00	695.00
01/31/24	MOLTON	ATTEND COURT STATUS CONFERENCE RE SCHEDULING OF DEBTOR'S 9019 MOTION AND DISCOVERY ISSUES PERTAINING THERETO	0.80	1,800.00
01/31/24	GOODMAN	ATTEND STATUS CONFERENCE WITH THE COURT	1.00	1,600.00
Total Hours and Fees			3.80	5,502.50

TIME SUMMARY

Professional	Hours	Rate	Value
DAVID J. MOLTON	0.80 hours at	2,250.00	1,800.00
ERIC R. GOODMAN	1.30 hours at	1,600.00	2,080.00
ERIC R. GOODMAN	0.70 hours at	1,325.00	927.50
ETHAN H. CALHOUN	1.00 hours at	695.00	695.00
Total Fees			5,502.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: DISMISSAL/TRUSTEE/EXAMINER MATTERS

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0017	DISMISSAL/TRUSTEE/EXAMINER MATTERS	43,155.00	0.00	43,155.00
Total		43,155.00	0.00	43,155.00

Total Current Fees	\$43,155.00
Total Current Costs	\$0.00
Total Invoice	\$43,155.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 40

RE: DISMISSAL/TRUSTEE/EXAMINER MATTERS

TIME DETAIL

Date	Professional	Description	Hours	Value
01/08/24	GOODMAN	CONFERENCE CALL WITH THE UST REGARDING CASE STATUS	0.60	960.00
01/09/24	MOLTON	REVIEW DRAFT MOTION RE CASE EXIT	2.50	5,625.00
01/24/24	CICERO	PARTICIPATE IN CALL RE: BR SUBPOENA (.6); FOLLOW-UP EMAILS RE: SAME (.5); REVIEW DEPOSITION TRANSCRIPTS AND FILINGS RE: I. LEFTKOWITZ FROM OTHER LEGAL PROCEEDINGS ALLEGING FRAUD FOR DEPOSITIONS RE: SAME (4.1); REVIEW DISCOVERY LIST FROM PROVINCE (.9)	6.10	9,150.00
01/25/24	CICERO	PREPARE FOR MULTIPLE DEPOSITIONS INCLUDING DOCUMENT REVIEW AND REVIEW OF OTHER COURT PROCEEDINGS INVOLVING PARTIES	4.10	6,150.00
01/26/24	CICERO	DISCOVERY RELATED STRATEGIZING WITH LITIGATION TEAM	2.80	4,200.00
01/26/24	SIEGER-GRIMM	ONGOING DISCUSSION AMONG COUNSEL RE: DISCOVERY ISSUES (.5); REVIEW DRAFT CORRESPONDENCE AND PROVIDE COMMENTS (.2)	0.70	840.00
01/28/24	CICERO	DISCOVERY RELATED STRATEGIZING WITH LITIGATION TEAM	0.90	1,350.00
01/28/24	SIEGER-GRIMM	REVIEW DRAFT FILING RE: DISCOVERY ISSUES AND PROVIDE COMMENTS (1.4); CONTINUED DISCUSSION AND REVIEW OF CORRESPONDENCE RE: SAME (.5)	1.90	2,280.00
01/29/24	CICERO	PREPARE LEFTKOWITZ DEPOSITION OUTLINE (5.2); GATHER RESEARCH AND MATERIAL FOR LEFTKOWITZ DEPOSITION OUTLINE (2.4); PARTICIPATE IN CALL WITH D. MOXLEY AND E. GOODMAN RE: DISCOVERY ISSUES AND STATUS CONFERENCE PREP (.8)	8.40	12,600.00
Total Hours and Fees			28.00	43,155.00

TIME SUMMARY

Professional	Hours	Rate	Value
DAVID J. MOLTON	2.50 hours at	2,250.00	5,625.00
GERARD T. CICERO	22.30 hours at	1,500.00	33,450.00
SUSAN SIEGER-GRIMM	2.60 hours at	1,200.00	3,120.00
ERIC R. GOODMAN	0.60 hours at	1,600.00	960.00
Total Fees			43,155.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 41

brownrudnick

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: FINANCING ISSUES

INVOICE

For professional services rendered in connection with the above captioned matter through January 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0018	FINANCING ISSUES	903.50	0.00	903.50
	Total	903.50	0.00	903.50

Total Current Fees	\$903.50
Total Current Costs	\$0.00
Total Invoice	\$903.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
February 20, 2024

Invoice 6973791
Page 42

RE: FINANCING ISSUES

TIME DETAIL

Date	Professional	Description	Hours	Value
01/31/24	CALHOUN	ANALYZING CASE LAW RELATED TO DEBTOR IN POSSESSION FINANCING IN THE FIFTH CIRCUIT AND EVALUATING ARGUMENTS.	1.30	903.50
Total Hours and Fees			1.30	903.50

TIME SUMMARY

Professional	Hours	Rate	Value
ETHAN H. CALHOUN	1.30 hours at	695.00	903.50
Total Fees			903.50

INCLUDES ONLY TIME AND COSTS TO DATE
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

brownrudnick

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6973791
Date Feb 20, 2024
Client 040178

RE: TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Remittance **remit**

Balance Due: \$451,379.70

To ensure proper credit to your account, please include this page with your payment.

Remittance Address

Brown Rudnick LLP
P.O. Box 23079
New York, NY 10087-3079

Wire Instructions

JP Morgan Chase
270 Park Avenue
New York, NY 10017
ABA Number: 021000021
SWIFT Code: CHASUS33

For Credit To

Brown Rudnick LLP Deposit Account
Account Number: 760367067

Exhibit C

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

In re: TEHUM CARE SERVICES, INC., ¹ Debtor.	Chapter 11 Case No. 23-90086 (CML)
--	---

**THIRD MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP FOR
 COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
 EXPENSES AS CO-COUNSEL TO THE OFFICIAL COMMITTEE
 OF TORT CLAIMANTS FOR THE PERIOD FROM
FEBRUARY 1, 2024 THROUGH FEBRUARY 29, 2024**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Brown Rudnick LLP
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 22, 2023 [ECF No. 1294]
Time Period Covered:	February 1, 2024 – February 29, 2024
Total Fees Sought:	\$1,217,462.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$1,164,929.50
Total professional hours covered by this statement:	984.50
Average hourly rate for professionals:	\$1,183.27

¹ The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.



Total paraprofessional fees covered by this statement:	\$52,532.50
Total paraprofessional hours covered by this statement:	104.90
Average hourly rate for paraprofessionals:	\$500.79
Reimbursable expenses sought in this statement:	\$30,965.98
Payment requested:	
80% Fees	\$973,969.60
100% Expenses	\$30,965.98
Total:	\$1,004,935.58

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Brown Rudnick LLP as Co-Counsel for the Official Committee of Tort Claimants as of November 22, 2023 [ECF No. 1294], the law firm of Brown Rudnick LLP (“Brown Rudnick”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this Third Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from February 1, 2024 to February 29, 2024 (the “Third Monthly Fee Statement”). By the Third Monthly Fee Statement and pursuant to the Interim Compensation Order, Brown Rudnick seeks interim payment of (i) \$973,969.60 (80% of \$1,217,462.00) as compensation for professional services rendered to the Committee and (ii) \$30,965.98 for reimbursement of actual and necessary expenses, for a total of \$1,004,935.58 for

the period February 1, 2024 through and including February 29, 2024 (the “Fee Period”).

Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m.

(CT) on the fourteenth day following service of this First Monthly Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Third Monthly Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Brown Rudnick partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Brown Rudnick established in accordance with its internal billing procedures. As reflected in Exhibit A, Brown Rudnick incurred \$1,217,462.00 in fees during the Fee Period. Pursuant to this Third Monthly Fee Statement, Brown Rudnick seeks compensation in the amount of \$973,969.60 or 80% of such fees

Exhibit B is a schedule providing certain information regarding the Brown Rudnick attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Third Monthly Fee Statement. Attorneys and paraprofessionals of Brown Rudnick expended a total of 1,089.40 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this Second Monthly Fee Statement. This Second Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$30,965.98.

Exhibit D consists of Brown Rudnick’s detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Brown Rudnick has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Third Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Brown Rudnick reserves the right to seek payment of such fees

and expenses not included herein. Subsequent monthly fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Brown Rudnick respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$1,004,935.58, consisting of (i) \$973,969.60, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Brown Rudnick, and (ii) \$30,965.98, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: March 12, 2024
New York, NY

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Eric R. Goodman

David J. Molton (*pro hac vice*)

Eric R. Goodman (*pro hac vice*)

Gerard T. Cicero (*pro hac vice*)

Seven Times Square

New York, NY 10036

Telephone: (212) 209-4800

Facsimile: (212) 209-4801

Email: dmolton@brownrudnick.com

egoodman@brownrudnick.com

gcicero@brownrudnick.com

CERTIFICATE OF SERVICE

I certify that on March 12, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Eric R. Goodman
Eric R. Goodman

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

FEE APPLICATION DATA

3/8/2024



CLIENT: 040178

1

Bill Date range: 3/8/2024 to 3/8/2024

CLNT MATT CODE	MATTER NAME	EMPLOYEE NAME	BILLED HRS	BILLED AMT
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	BURNS, THOMAS	5.50	\$2,750.00
			5.50	\$2,750.00
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE	CICERO, GERARD T. GOODMAN, ERIC R.	2.40	\$3,600.00
			1.50	\$2,400.00
			3.90	\$6,000.00
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	CICERO, GERARD T. CALHOUN, ETHAN H.	0.50	\$750.00
			3.50	\$2,432.50
			4.00	\$3,182.50
040178.0008	FEE/EMPLOYMENT APPLICATIONS	BURNS, THOMAS CALHOUN, ETHAN H.	6.80	\$3,400.00
			1.10	\$764.50
			7.90	\$4,164.50
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	VLACHOS, HELEN MOLTON, DAVID J. CICERO, GERARD T. MEYERS, JESSICA N. MOXLEY, D. CAMERON MCCAFFERTY, MEGHAN WELLS, KELCEY C. SIEGER-GRIMM, SUSAN GOODMAN, ERIC R. VEILLEUX, BRITTANY E. CASTANO, ELIZABETH, C. ALICEA, SHARIX A. QUIJANO, ANDRES HESTER, EMILY A. BURNS, THOMAS	0.30	\$133.50
			3.00	\$6,750.00
			148.20	\$222,300.00
			55.20	\$58,512.00
			188.90	\$236,125.00
			169.90	\$161,405.00
			7.60	\$3,648.00
			113.10	\$135,720.00
			142.80	\$228,480.00
			6.60	\$3,399.00
			20.40	\$13,158.00
			5.00	\$3,875.00
			9.50	\$3,657.50
			14.90	\$5,736.50
33.30	\$16,650.00			

FEE APPLICATION DATA

3/8/2024



CLIENT: 040178

1

Bill Date range: 3/8/2024 to 3/8/2024

		CALHOUN, ETHAN H.	76.40	\$53,098.00
			995.10	\$1,152,647.50
040178.0011		CICERO, GERARD T.	7.00	\$5,250.00
		MEYERS, JESSICA N.	21.00	\$11,130.00
	NON-WORKING TRAVEL @ 50%	MOXLEY, D. CAMERON	34.70	\$21,687.50
		MCCAFFERTY, MEGHAN	1.00	\$475.00
		GOODMAN, ERIC R.	5.40	\$4,320.00
			69.10	\$42,862.50
040178.0014	PLAN AND DISCLOSURE STATEMENT	GOODMAN, ERIC R.	0.50	\$800.00
			0.50	\$800.00
040178.0015	MEDIATION/SETTLEMENT	GOODMAN, ERIC R.	1.20	\$1,920.00
			1.20	\$1,920.00
040178.0016		MOLTON, DAVID J.	0.80	\$1,800.00
	COURT ATTENDANCE	GOODMAN, ERIC R.	0.40	\$640.00
		CALHOUN, ETHAN H.	1.00	\$695.00
			2.20	\$3,135.00
			1,089.40	\$1,217,462.00

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

SUMMARY OF TIME & COMPENSATION

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
David J. Molton	Partner; Admitted to New York Bar in 1983; Admitted to New Jersey Bar in 1990; Admitted to California Bar in 2009; Dispute Resolution & Restructuring	\$2,250	3.80	\$8,550.00
Eric R. Goodman	Partner; Admitted to Ohio Bar in 2003; Admitted to New York Bar in 2018; Admitted to Illinois Bar in 2020; Admitted to District Court of Columbia Bar in 2021; Admitted to Massachusetts Bar in 2021; Dispute Resolution & Restructuring	\$1,600	151.80	\$238,560.00
Gerard T. Cicero	Partner; Admitted to New Jersey Bar in 2015; Admitted to New York Bar in 2016; Dispute Resolution & Restructuring	\$1,500	158.10	\$231,900.00
D. Cameron Moxley	Partner; Admitted to New York Bar in 2005; Admitted to Connecticut Bar in 2022; Dispute Resolution & Restructuring	\$1,250	223.60	\$257,812.50
Susan Sieger-Grimm	Counsel; Admitted to Virginia Bar in 1994; Admitted to New York Bar 1997; Dispute Resolution & Restructuring	\$1,200	113.10	\$135,720.00
Jessica N. Meyers	Partner; Admitted in Massachusetts Bar in 2015; Admitted to New York Bar in 2017;	\$1,060	76.20	\$69,642.00

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
	Dispute Resolution & Restructuring			
Meghan McCafferty	Associate; Admitted to Massachusetts Bar in 2019; Dispute Resolution & Restructuring	\$950	170.90	\$161,880.00
Sharix A. Alicea	Associate; Admitted to Connecticut Bar in 2020; Admitted to New York Bar in 2020; Admitted to District Court of Columbia Bar in 2023; Corporate & Capital Markets	\$775	5.00	\$3,875.00
Ethan H. Calhoun	Associate; Admitted to Alabama Bar in 2021; Admitted to New York Bar in 2023; Dispute Resolution & Restructuring	\$695	82.00	\$56,990.00
TOTAL			984.50	\$1,164,929.50
PROFESSIONAL BLENDED RATE		\$1,183.27		

COMPENSATION BY PARAPROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
Elizabeth C. Castano	Law Clerk	\$645	20.40	\$13,158.00
Brittany E. Veilleux	Litigation Technology Specialist	\$515	6.60	\$3,399.00
Thomas Burns	Paralegal	\$500	45.60	\$22,800.00
Kelcey C. Wells	Paralegal	\$480	7.60	\$3,648.00
Helen Vlachos	Manager of Research Services	\$445	.30	\$133.50
Emily A. Hester	Paralegal	\$385	14.90	\$5,736.50
Andres Quijano	Paralegal	\$385	9.50	\$3,657.50
TOTAL			104.90	\$52,532.50
PARAPROFESSIONAL BLENDED RATE		\$500.79		

EXHIBIT C

Record of Expenses

brownrudnick

BILLED DISBURSEMENTS

Client: TEHUM CARE SERVICES, INC., OFFICIAL TORT (040178)

3/8/2024

Amounts shown in USD

1

CLIENT NAME	COST DESC	BILLED AMT
TEHUM CARE SERVICES, INC., OFFICIAL TORT	Airfare	3,427.11
	Copies	107.20
	Document Production	0.00
	eDiscovery Hosting	2,473.90
	Expert Fees	5,358.00
	Hotel	3,495.27
	Lexis	138.50
	Meals	548.80
	Outside Copies	4,664.97
	Pacer	48.30
	Searches	80.00
	Taxi	1,354.21
	Travel Agent Fee	180.00
	Westlaw Online Transactional Searches / Docs	9,089.72
	30,965.98	

EXHIBIT D

Detailed Record of Time Entries

brownrudnick

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	2,750.00	30,607.98	33,357.98
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	6,000.00	0.00	6,000.00
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	3,182.50	0.00	3,182.50
040178.0008	FEE/EMPLOYMENT APPLICATIONS	4,164.50	0.00	4,164.50
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	1,152,647.50	0.00	1,152,647.50
040178.0011	NON-WORKING TRAVEL @ 50%	42,862.50	0.00	42,862.50
040178.0014	PLAN AND DISCLOSURE STATEMENT	800.00	0.00	800.00
040178.0015	MEDIATION/SETTLEMENT	1,920.00	0.00	1,920.00
040178.0016	COURT ATTENDANCE	3,135.00	0.00	3,135.00
040178.0017	DISMISSAL/TRUSTEE/EXAMINER MATTERS	0.00	358.00	358.00
	Total	1,217,462.00	30,965.98	1,248,427.98

Total Current Fees	\$1,217,462.00
20% Holdback Amount	(243,492.40)
80% CURRENT BALANCE DUE	\$973,969.60
Total Current Costs	\$30,965.98
Total Invoice	\$1,004,935.58



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: CASE ADMINISTRATION/DISBURSEMENTS

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	2,750.00	30,607.98	33,357.98
	Total	2,750.00	30,607.98	33,357.98

Total Current Fees	\$2,750.00
Total Current Costs	\$30,607.98
Total Invoice	\$33,357.98



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 3

RE: CASE ADMINISTRATION/DISBURSEMENTS

TIME DETAIL

Date	Professional	Description	Hours	Value
02/02/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1), PERFORMED MAINTENANCE ON INTERNAL EMAIL DISTRIBUTION LIST (.4); OBTAINED TRANSCRIPT OF JANUARY 31, 2024 HEARING (.4)	1.00	500.00
02/06/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES(.2)	0.30	150.00
02/08/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	100.00
02/12/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1); CONFER WITH M. MCCAFFERTY RE SD TEXAS PRO HAC VICE MOTION (.3)	0.50	250.00
02/13/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1); DRAFTED PRO HAC VICE MOTION FOR M. MCCAFFERTY (.7)	0.90	450.00
02/14/24	BURNS	FILE PRO HAC VICE MOTION FOR MEGHAN MCCAFFERTY	0.60	300.00
02/23/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2)	0.30	150.00
02/26/24	BURNS	DRAFT MOTION FOR ADMISSION PRO HAC VICE FOR S. SIEGER-GRIMM	0.70	350.00
02/27/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2)	0.30	150.00
02/27/24	BURNS	FILE MOTION FOR ADMISSION PRO HAC VICE FOR S. SIEGER-GROSS (.5)	0.50	250.00
02/29/24	BURNS	REVIEW AND ANALYZE DOCKET (.1); CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	100.00
Total Hours and Fees			5.50	2,750.00

TIME SUMMARY

Professional	Hours	Rate	Value
THOMAS BURNS	5.50 hours at	500.00	2,750.00
Total Fees			2,750.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 4

COST SUMMARY

Description	Value
EXPERT FEES	5,000.00
MEALS	548.80
OUTSIDE COPIES	4,664.97
TRAVEL AGENT FEE	180.00
SEARCHES	80.00
AIRFARE	3,427.11
TAXI	1,354.21
HOTEL	3,495.27
LEXIS	138.50
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	9,089.72
PACER	48.30
EDISCOVERY HOSTING	2,473.90
COPIES	107.20
Total Costs	30,607.98



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH
COMMITTEE/CREDITORS

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	6,000.00	0.00	6,000.00
	Total	6,000.00	0.00	6,000.00

Total Current Fees	\$6,000.00
Total Current Costs	\$0.00
Total Invoice	\$6,000.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 6

RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

TIME DETAIL

Date	Professional	Description	Hours	Value
02/06/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE REGARDING CASE STATUS	0.50	800.00
02/13/24	GOODMAN	ATTEND COMMITTEE CALL REGARDING CASE STATUS	1.00	1,600.00
02/20/24	CICERO	PARTICIPATE IN WEEKLY COMMITTEE MEETING	0.80	1,200.00
02/27/24	CICERO	PARTICIPATE IN MEDIATION RELATED CALL WITH SUBGROUP OF COMMITTEE MEMBERS (.5); ATTEND WEEKLY COMMITTEE CALL (1.1)	1.60	2,400.00
Total Hours and Fees			3.90	6,000.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	2.40 hours at	1,500.00	3,600.00
ERIC R. GOODMAN	1.50 hours at	1,600.00	2,400.00
Total Fees			6,000.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	3,182.50	0.00	3,182.50
	Total	3,182.50	0.00	3,182.50

Total Current Fees	\$3,182.50
Total Current Costs	\$0.00
Total Invoice	\$3,182.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 March 8, 2024

Invoice 6974376
 Page 8

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

TIME DETAIL

Date	Professional	Description	Hours	Value
02/01/24	CALHOUN	STRATEGIZING WITH CO-COUNSEL REGARDING PROCEDURAL REQUIREMENTS FOR FILING MOTION TO QUASH SUBPOENA.	0.40	278.00
02/02/24	CALHOUN	STRATEGIZING DISCOVERY RELATED MATTERS/ISSUES WITH CO-COUNSEL.	1.40	973.00
02/04/24	CALHOUN	STRATEGIZING DISCOVERY RELATED MATTERS WITH CO-COUNSEL	0.50	347.50
02/05/24	CALHOUN	STRATEGIZING WITH CO-COUNSEL IN PREPARATION FOR STATUS CONFERENCE AND DEPOSITIONS.	0.80	556.00
02/22/24	CALHOUN	DISCUSSING REDACTION RELATED RULES WITH CO-COUNSEL.	0.40	278.00
02/25/24	CICERO	MEETING WITH M. ATKINSON	0.50	750.00
Total Hours and Fees			4.00	3,182.50

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	0.50 hours at	1,500.00	750.00
ETHAN H. CALHOUN	3.50 hours at	695.00	2,432.50
Total Fees			3,182.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: FEE/EMPLOYMENT APPLICATIONS

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0008	FEE/EMPLOYMENT APPLICATIONS	4,164.50	0.00	4,164.50
	Total	4,164.50	0.00	4,164.50

Total Current Fees	\$4,164.50
Total Current Costs	\$0.00
Total Invoice	\$4,164.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 10

RE: FEE/EMPLOYMENT APPLICATIONS

TIME DETAIL

Date	Professional	Description	Hours	Value
02/07/24	CALHOUN	DRAFTING FEE STATEMENT FOR MONTH OF JANUARY.	0.50	347.50
02/09/24	BURNS	CONFER WITH E. CALHOUN RE SECOND MONTHLY FEE STATEMENT	0.30	150.00
02/15/24	BURNS	WORK ON SECOND MONTHLY FEE STATEMENT (1.2); TIME AND COST REVIEW W/O (.7)	1.20	600.00
02/16/24	BURNS	TIME AND COST REVIEW W/O (1.1); WORK ON MONTHLY FEE APPLICATION (.8)	0.80	400.00
02/20/24	BURNS	TIME AND COST REVIEW W/O (1.3); WORK ON SECOND MONTHLY FEE STATEMENT (1.1)	1.10	550.00
02/21/24	CALHOUN	EDITING FEE APPLICATION FOR MONTH OF JANUARY.	0.60	417.00
02/21/24	BURNS	TIME AND COST REVIEW W/O (.8); WORK ON SECOND MONTHLY FEE APPLICATION (.9); CONFER WITH E. CALHOUN REGARDING MONTHLY FEE APPLICATION (.3)	1.20	600.00
02/22/24	BURNS	TIME AND COST REVIEW W/O (.8); WORK ON SECOND FEE STATEMENT (1.2)	1.20	600.00
02/26/24	BURNS	WORK ON SECOND MONTHLY FEE STATEMENT	1.00	500.00
Total Hours and Fees			7.90	4,164.50

TIME SUMMARY

Professional	Hours	Rate	Value
THOMAS BURNS	6.80 hours at	500.00	3,400.00
ETHAN H. CALHOUN	1.10 hours at	695.00	764.50
Total Fees			4,164.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	1,152,647.50	0.00	1,152,647.50
	Total	1,152,647.50	0.00	1,152,647.50

Total Current Fees	\$1,152,647.50
Total Current Costs	\$0.00
Total Invoice	\$1,152,647.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 12

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

TIME DETAIL

Date	Professional	Description	Hours	Value
02/01/24	MCCAFFERTY	RESEARCH AND ANALYZE CASE LAW IN SUPPORT OF ARGUMENT FOR OFFENSIVE NON-MUTUAL COLLATERAL ESTOPPEL AND DRAFT ARGUMENT (.7); REVIEW LETTER FROM SENATOR WARREN TO UNITED STATES TRUSTEE REGARDING MOTION TO DISMISS AND IDENTIFY SOURCES RELIED ON (.4)	1.10	1,045.00
02/01/24	VEILLEUX	CONFER WITH CASE TEAM REGARDING DATABASE FUNCTIONALITY	0.20	103.00
02/01/24	SIEGER-GRIMM	REVIEW CORRESPONDENCE RE: DISCOVERY DEADLINES AND DEPOSITIONS (.1); REVIEW SENATE CORRESPONDENCE AND RESPONSES RE: YESCARE/TEHUM (.9); MEET AND CONFER WITH DEBTOR/UCC COUNSEL RE: DISCOVERY SCHEDULE ISSUES (.6)	1.60	1,920.00
02/01/24	CALHOUN	REVIEWING NEW PRODUCTIONS RELATED TO YESCARE AND COORDINATING EXHIBITS	1.90	1,320.50
02/01/24	CALHOUN	PREPARING MATERIALS/SUMMARIES IN PREPARATION FOR UPCOMING DEPOSITIONS	2.00	1,390.00
02/01/24	CALHOUN	ANALYZING FEDERAL PROCEDURAL REQUIREMENTS, BANKRUPTCY PROCEDURAL REQUIREMENTS, AND CASE LAW RELATED TO PROCEDURE OF MOTION TO QUASH SUBPOENA WHERE ISSUING COURT AND COMPLIANCE COURT ARE NOT THE SAME	1.30	903.50
02/01/24	CALHOUN	DRAFTING ANALYSIS AND STRATEGY RELATED TO PROCEDURAL REQUIREMENTS OF A MOTION TO QUASH A SUBPOENA AND A MOTION TO TRANSFER A MOTION TO QUASH SUBPOENA	0.30	208.50
02/01/24	MOXLEY	CONFER WITH E. GOODMAN IN PREPARATION FOR UCC AND DEBTOR RULE 30(B)(6) DEPOSITIONS AND REVISE OUTLINE FOR THE SAME (1.3); REVIEW COMMENTS TO TCC RESPONSES AND OBJECTIONS TO DISCOVERY (.3); MEET AND CONFER WITH INTERESTED PARTIES REGARDING DEPOSITION AND DISCOVERY SCHEDULE PRE-HEARING AND PREPARE FOR THE SAME (.8); PREPARE FOR FEB. 21 HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (1.0)	3.40	4,250.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 13

Date	Professional	Description	Hours	Value
02/01/24	GOODMAN	EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (3.3); DRAFT OUTLINE FOR REPLY IN SUPPORT OF MOTION TO DISMISS (2.5); REVIEW WARREN LETTER AND RELATED DOCUMENTS (1.3); FURTHER REVIEW OF CASE LAW IN SUPPORT OF OBJECTION TO RULE 9019 MOTION (.4); CONFERENCE CALLS WITH MR. MOXLEY REGARDING DISCOVERY SCHEDULE (.3)(.3); CONFERENCE CALL WITH MR. ZIMMERMAN REGARDING DISCOVERY SCHEDULE (.6); MEET AND CONFER REGARDING DISCOVERY SCHEDULE (.5); TELEPHONE CALL WITH MR. MOXLEY REGARDING UCC DEPOSITIONS (.8)	10.00	16,000.00
02/01/24	CALHOUN	MEET AND CONFER REGARDING DEPOSITIONS AND RELATED LOGISTICS	0.50	347.50
02/01/24	CICERO	PREPARE FOR DEPOSITIONS FOR NEXT WEEK	6.30	9,450.00
02/01/24	MEYERS	DRAFT DEPOSITION OUTLINE FOR LEFKOWITZ DEPOSITION; ATTEND CONFERENCE CALLS TO DISCUSS DEPOSITIONS AND TRIAL STRATEGY AND MOTION TO QUASH; ATTEND MEET AND CONFER WITH DEBTOR'S AND UCC'S COUNSEL	3.30	3,498.00
02/02/24	GOODMAN	CONFERENCE CALL WITH BROWN RUDNICK TEAM REGARDING DISCOVERY PLAN AND LITIGATION STRATEGY (.6); TELEPHONE CALL WITH PROVINCE REGARDING SUPPLEMENTAL PRODUCTION (.4); TELEPHONE CALL WITH MR. ZIMMERMAN AND MR. MOXLEY REGARDING STATUS CONFERENCE (.5); EDIT AND REVISE MOTION FOR STATUS CONFERENCE (.5); TELEPHONE CALL WITH MR. MOXLEY REGARDING MOTION FOR STATUS CONFERENCE AND RELATED MATTERS (.5); TELEPHONE CALLS WITH MR. MOXLEY REGARDING DISCOVERY ISSUES (.1)(.2)(.1)(.3); CONFERENCE CALL WITH THE UST REGARDING RULE 9019 MOTION (.5); FOLLOW-UP CALL WITH MR. ZIMMERMAN REGARDING RULE 9019 MOTION (.4); REVIEW FINAL DISCOVERY RESPONSES (.4); EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (2.5); DRAFT AND EDIT OUTLINE FOR PROVINCE QUESTIONS (1.6)	8.60	13,760.00
02/02/24	CALHOUN	STRATEGIZING DISCOVERY, EXHIBITS, AND OTHER PRE-DEPOSITION PREP WITH BR TEAM	1.20	834.00
02/02/24	CALHOUN	COORDINATING SERVICE AND SUBPOENAS RELATED TO DEPOSITIONS	0.40	278.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 14

Date	Professional	Description	Hours	Value
02/02/24	CALHOUN	ANALYZING CASE LAW AND EVALUATING ARGUMENTS RELATED TO MOTION TO QUASH SUBPOENA TO BROWN RUDNICK	1.60	1,112.00
02/02/24	VEILLEUX	LOAD DATA SET TO DATABASE FOR CASE TEAM ACCESS	0.60	309.00
02/02/24	CALHOUN	EVALUATING DISCOVERY ISSUES AND ASSISTING WITH DRAFTING EMERGENCY MOTION FOR STATUS CONFERENCE	1.30	903.50
02/02/24	CALHOUN	STRATEGIZING DISCOVERY RELATED MATTERS WITH FINANCIAL ADVISORS	0.50	347.50
02/02/24	CALHOUN	ANALYZING PROCEDURAL RULES RELATED TO DISCOVERY RESPONSES AND REVIEWING DISCOVERY RESPONSES TO BE SUBMITTED TO DEBTORS AND UCC	0.50	347.50
02/02/24	CALHOUN	STRATEGIZING DIP OBJECTION WITH CO-COUNSEL	0.50	347.50
02/02/24	CALHOUN	ANALYZING DISCOVERY DOCUMENTS SUBMITTED BY DEBTORS AND CREATING EXHIBITS FOR UPCOMING DEPOSITIONS	5.80	4,031.00
02/02/24	CALHOUN	PREPARING MATERIALS FOR UPCOMING DEPOSITIONS	1.10	764.50
02/02/24	SIEGER-GRIMM	DISCUSSION OF MOTION TO QUASH RE: BR SUBPOENA (.3); REVIEW CORRESPONDENCE RE: POTENTIAL WITHDRAWAL OF SUBPOENA (.1)	0.40	480.00
02/02/24	CICERO	CALLS RE: DISCOVERY ISSUES WITH CO-COUNSEL (2.1); DRAFT AND REVISE LEFKOWITZ DEPOSITION (5.5)	7.60	11,400.00
02/02/24	SIEGER-GRIMM	REVIEW EXHIBIT LIST FOR LEFKOWITZ/YESCARE DEPOS (.2); REVIEW DOCKET RE: POSSIBLE ADDITIONAL EXHIBITS (.4); EMERGENCY HEARING RE: DISCOVERY (.5); PROFESSIONAL TEAM PLANNING MEETING (.5)	1.60	1,920.00
02/02/24	MEYERS	DRAFT OUTLINE FOR LEFKOWITZ DEPOSITION; ATTEND INTERNAL CONFERENCE CALLS TO DISCUSS DISCOVERY SCHEDULE AND LOGISTICS, MOTION TO QUASH SUBPOENA TO BROWN RUDNICK, AND EXAMINATION TOPICS	6.20	6,572.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 15

Date	Professional	Description	Hours	Value
02/02/24	MOXLEY	PREPARE FOR TRIAL ON MOTION TO DISMISS AND RULE 9019 MOTION (.3); DRAFT EMERGENCY MOTION FOR STATUS CONFERENCE IN LIGHT OF NEWLY-PRODUCED DOCUMENTS (1.5); PREPARE FOR MEET AND CONFER AND MEET AND CONFER (2.0); PREPARE FOR EMERGENCY CONFERENCE, ATTEND EMERGENCY COURT CONFERENCE, AND FOLLOW-UP WITH TEAM REGARDING YESCARE DOCUMENTS IN LIGHT OF CONFERENCE DISCUSSION (2.7); FINALIZE RESPONSES AND OBJECTIONS TO WRITTEN DISCOVERY AND REVIEW DEBTOR'S AND UCC'S DISCOVERY RESPONSES (1.4)	7.90	9,875.00
02/02/24	MOLTON	ATTENTION TO PROGRESS DISCOVERY ISSUES RE DEBTOR'S 9019 MOTION	1.30	2,925.00
02/02/24	BURNS	PREPARE FOR FILING AND ELECTRONICALLY FILE EMERGENCY MOTION FOR STATUS CONFERENCE (.4); PREPARE FOR FILING AND ELECTRONICALLY FILE NOTICE OF STATUS CONFERENCE (.3)	0.70	350.00
02/03/24	CALHOUN	ANALYZING DISCOVERY PRODUCED BY DEBTORS NIGHT OF 2/2 AND DRAFTING SUMMARIES OF INVENTORY	3.50	2,432.50
02/03/24	GOODMAN	FURTHER REVISIONS TO OBJECTION TO RULE 9019 MOTION (1.1); TELEPHONE CALL WITH MR. MOXLEY REGARDING DISCOVERY ISSUES (.5)	1.60	2,560.00
02/03/24	CALHOUN	ANALYZING YESCARE RELATED PRODUCTIONS	5.60	3,892.00
02/03/24	CALHOUN	DRAFTING SUMMARIES OF DOCUMENTS IN YESCARE PRODUCTION AND PREPARING LITIGATION MATERIALS	1.40	973.00
02/03/24	VEILLEUX	MODIFY DATABASE STRUCTURE PER CASE TEAM SPECIFICATIONS TO ADD REVIEW TAGS	0.10	51.50
02/03/24	SIEGER-GRIMM	REVIEW FILINGS RE: BR SUBPOENA (.2); OUTLINE POINTS FOR MOTION TO QUASH (.4); REVIEW FURTHER CORRESPONDENCE RE: POTENTIAL WITHDRAWAL OF SUBPOENA (.2)	0.80	960.00
02/03/24	MOXLEY	ATTENTION TO YESCARE NEWLY-PRODUCED DOCUMENTS AND REVIEW WRITTEN RESPONSES TO TCC'S DISCOVERY TO THE DEBTOR AND UCC	1.60	2,000.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 16

Date	Professional	Description	Hours	Value
02/04/24	MCCAFFERTY	STRATEGIZE REGARDING MOTION TO QUASH (.6); STRATEGIZE WITH FINANCIAL ADVISOR TEAM REGARDING CONFERENCE (.6); RESEARCH AND ANALYZE CASE LAW IN SUPPORT OF MOTION TO QUASH, MOTION FOR PROTECTIVE ORDER, AND MOTION FOR SANCTIONS (3.2); DRAFT NOTICE OF MOTION TO QUASH, MOTION FOR PROTECTIVE ORDER, AND MOTION FOR SANCTIONS (.6); DRAFT MEMORANDUM OF LAW IN SUPPORT OF MOTION TO QUASH, MOTION FOR PROTECTIVE ORDER, AND MOTION FOR SANCTIONS (3.6)	8.60	8,170.00
02/04/24	CALHOUN	ANALYZING 7,642 YESCARE DOCUMENTS PRODUCED ON EVE OF SCHEDULED DEPOSITIONS AND DRAFTING SUMMARIES/PREPARING EXHIBITS	3.90	2,710.50
02/04/24	VEILLEUX	QUERY DATABASE PER CASE TEAM SPECIFICATIONS AND REPORT FINDINGS	0.90	463.50
02/04/24	GOODMAN	DRAFT DEPOSITION QUESTIONS FOR MR. LETKOWITZ (.3); EDIT AND REVISE MOTION TO QUASH (.7); CONFERENCE CALL WITH PROVINCE REGARDING YESCARE DOCUMENTS (.6); CONFERENCE CALL WITH MR. MOXLEY AND MS. SIEGER-GRIMM REGARDING MOTION TO QUASH (.4)	2.00	3,200.00
02/04/24	CALHOUN	DRAFTING SUMMARY OF RECENT DISCOVERY FINDINGS IN ANTICIPATION OF FEBRUARY 5 HEARING	2.80	1,946.00
02/04/24	SIEGER-GRIMM	RESEARCH RE: SDNY MOTION TO QUASH SERVICE OF SUBPOENA ON NON-PARTY LAW FIRM (1.7); REVIEW AND REVISE MOTION TO QUASH (3.1); DISCUSSION WITH E. GOODMAN AND C. MOXLEY RE: MOTION TO QUASH/NEXT STEPS (.5); FOLLOW UP WITH M. MCCAFFREY RE: MOTION TO QUASH AND SUPPORTING DOCUMENTS (.2); FURTHER REVISIONS TO MOTION TO QUASH (2.0); DISCUSSION RE: SUPPORTING DECLARATION AND FOLLOW UP RE: SAME (.3)	7.80	9,360.00
02/04/24	CICERO	REVIEW MATERIAL FROM DISCOVERY RE: LEFKOWITZ DEPOSITION	3.50	5,250.00
02/04/24	SIEGER-GRIMM	DISCUSSION WITH TEHUM PROFESSIONALS RE: LATE-PRODUCED DOCUMENTS AND IMPLICATIONS (.6); FOLLOW UP DISCUSSION WITH C. MOXLEY AND E. GOODMAN RE: NEXT STEPS (.5)	1.10	1,320.00
02/04/24	MEYERS	DRAFT OUTLINE FOR LEFKOWITZ DEPOSITION	5.70	6,042.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 17

Date	Professional	Description	Hours	Value
02/04/24	MOXLEY	PREPARE FOR CONFERENCE ON JANUARY 30TH NEWLY-PRODUCED DOCUMENTS AND MEET WITH PROVINCE AND BR TEAMS RE THE SAME	1.60	2,000.00
02/04/24	MOXLEY	CALLS WITH M. MCCAFFERTY AND TEAM RE MOTION TO QUASH AND REVISE DRAFT MOTION TO QUASH	1.30	1,625.00
02/05/24	MCCAFFERTY	REVISE DECLARATION IN SUPPORT OF MOTION TO QUASH AND FOR SANCTIONS (.7); REVISE MOTION TO QUASH (1.1); REVISE MOTION FOR SANCTIONS (.5); RESEARCH IN SUPPORT OF MOTION FOR SANCTIONS (.8); RESEARCH IN SUPPORT OF MOTION TO QUASH (.9); DRAFT NOTICE OF MOTION (.4); PREPARE EXHIBITS FOR DEPOSITION OF LEFKOWITZ (.5); FINALIZE, FILE, AND PREPARE SERVICE FOR MOTION TO QUASH, MOTION FOR PROTECTIVE ORDER, AND MOTION FOR SANCTIONS (1.0)	5.90	5,605.00
02/05/24	GOODMAN	DRAFT AND EDIT DEPOSITION QUESTIONS FOR LEFKOWITZ DEPOSITION (2.8); REVIEW AND EDIT MOTION TO QUASH (1.0); EDIT AND REVISE OBJECTION TO DIP MOTION (1.0); CONFERENCE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS (.5); ATTEND HEARING ON SCHEDULING MOTION (.5); POST-HEARING CONFERENCE CALL WITH LITIGATION TEAM REGARDING CASE PLAN (.5); TELEPHONE CALLS WITH MR. MOXLEY REGARDING CASE STATUS (.2)(.1)(.1)	6.70	10,720.00
02/05/24	SIEGER-GRIMM	REVIEW COMMENTS TO MOTION TO QUASH AND UPDATE/REVISE MOTION (1.4); COORDINATE FILING ISSUES RE: SAME (.6); REVIEW AND UPDATE DRAFT DECLARATION (.9); REVIEW AND REVISE NOTICE OF MOTION TO QUASH (.4); DRAFT EMAIL TO UCC COUNSEL RE: SERVICE OF MOTION TO QUASH (.4); DISCUSSION WITH C. MOXLEY RE: SERVICE EMAIL (.1); DISCUSSION WITH J. MILIBAND RE: SAME (.1); DISCUSSIONS WITH BR TEAM RE: NECESSITY OF NOTICE IN BANKRUPTCY CASE (.4); FOLLOW UP RE: SERVICE ISSUES FOR MOTION TO QUASH (.3)	4.60	5,520.00
02/05/24	CALHOUN	PREPARING MATERIALS FOR LEFKOWITZ DEPOSITION	1.40	973.00
02/05/24	CALHOUN	RESEARCH RELATED TO FIFTH INTERIM DIP OBJECTION	0.80	556.00
02/05/24	CALHOUN	DRAFTING OUTLINE FOR DIP OBJECTION AND ARGUMENTS	0.90	625.50
02/05/24	CALHOUN	ANALYZING DISCOVERY DOCUMENTS/COMPILING DOCUMENTS FOR UPCOMING DEPOSITIONS	2.20	1,529.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 18

Date	Professional	Description	Hours	Value
02/05/24	MEYERS	PREPARE OUTLINE FOR LEFKOWITZ DEPOSITION; ATTEND COURT CONFERENCE REGARDING DISCOVERY DISPUTES AND SCHEDULING ISSUES AND ATTEND INTERNAL DEBRIEFING CALL THEREAFTER	9.10	9,646.00
02/05/24	MOXLEY	REVISE OPPOSITION TO MOTION TO QUASH SUBPOENA TO BROWN RUDNICK	0.60	750.00
02/05/24	MOXLEY	PREPARE FOR AND PRESENT AT CONTINUED COURT STATUS CONFERENCE (2.2); ATTENTION TO SUBPOENAS TO FTI AND YESCARE EXECUTIVES (.4); PREPARE FOR DEBTOR AND UCC AND OTHER DEPOSITIONS (3.3)	5.90	7,375.00
02/05/24	CICERO	DEPOSITION PREP WITH JESS MEYERS	5.00	7,500.00
02/05/24	CICERO	DRAFT DIP OBJECTION	3.50	5,250.00
02/05/24	MOLTON	ATTENTION TO PROGRESS DISCOVERY ISSUES RE DEBTOR'S 9019 MOTION	0.90	2,025.00
02/05/24	BURNS	RETRIEVING DOCUMENTS TO BE USED IN LEFKOWITZ 2/8 DEPOSITION	0.70	350.00
02/05/24	CALHOUN	DRAFTING OUTLINE OF EXHIBITS AND OTHER LITIGATION MATERIALS	0.80	556.00
02/05/24	WELLS	REVISE AND FINALIZE MOTION TO QUASH SUBPOENA AND SUPPORTING PAPERS, FINALIZE AND FILE SAME	2.30	1,104.00
02/06/24	CICERO	PREPARE FOR M2 DEPOSITION AND LEFKOWITZ DEPOSITION	2.90	4,350.00
02/06/24	MCCAFFERTY	STRATEGIZE WITH E. GOODMAN REGARDING DRAFTING ALTER EGO ARGUMENT FOR OPPOSITION TO 9019 MOTION (.5); RESEARCH IN SUPPORT OF ALTER EGO ARGUMENT FOR OPPOSITION TO 9019 MOTION (.6); COMPILE EXHIBITS FOR DEPOSITION OF LEFKOWITZ (.9); DRAFT SUBPOENAS, DOCUMENT REQUESTS, AND DEPOSITION TOPICS FOR DEPOSITIONS OF FTI AND YESCARE WITNESSES (1.4); RESEARCH IN SUPPORT OF SERVICE OF SUBPOENAS (.6)	4.00	3,800.00
02/06/24	GOODMAN	REVIEW LEFKOWITZ DEPOSITION OUTLINE (1.0); CONFERENCE CALL WITH MS. MEYERS AND MR. MOXLEY REGARDING LEFKOWITZ DEPOSITION OUTLINE (.5); FURTHER REVISIONS TO OBJECTION TO RULE 9019 MOTION (1.5); TELEPHONE CALL MS. MCCAFFERTY REGARDING FURTHER RESEARCH IN SUPPORT OF RULE 9019 OBJECTION (.5); FURTHER REVIEW OF YESCARE RESPONSE TO WARREN LETTER (.2)	0.20	320.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 19

Date	Professional	Description	Hours	Value
02/06/24	SIEGER-GRIMM	EMAILS AND FOLLOW UP RE: ISSUES RELATED TO SERVICE OF MOTION TO QUASH	0.40	480.00
02/06/24	MEYERS	DISCUSS ISSUES WITH SERVICE OF TRIAL SUBPOENA ON LEFKOWITZ INTERNALLY; ATTEND INTERNAL CONFERENCE CALL TO DISCUSS LEFKOWITZ DEPOSITION; CORRESPOND CONCERNING LOGISTICS FOR LEFKOWITZ DEPOSITION; REVISE LEFKOWITZ DEPOSITION OUTLINE	3.60	3,816.00
02/06/24	CALHOUN	ANALYZING FEDERAL AND STATE PROCEDURAL RULES AND CASES RELATED TO SERVICE OF PROCESS	1.30	903.50
02/06/24	CALHOUN	DRAFTING DISCOVERY RELATED MATERIALS FOR UPCOMING DEPOSITIONS	1.50	1,042.50
02/06/24	CALHOUN	ANALYZING DISCOVERY MATERIALS FROM RECENT PRODUCTIONS AND PREPARING MATERIALS FOR UPCOMING DEPOSITIONS	2.20	1,529.00
02/06/24	CALHOUN	COORDINATING SERVICE OF PROCESS OF DISCOVERY MATERIALS	0.60	417.00
02/06/24	BURNS	ARRANGING THE PRINTING AND SHIPPING OF DEPOSITION DOCUMENTS TO DALLAS FOR LEFKOWITZ DEPOSITION	0.50	250.00
02/06/24	MOXLEY	ATTENTION TO YESCARE SUBPOENA SERVICE ISSUES AND COORDINATE WITH NASHVILLE COUNSEL RE THE SAME (1.3); PARTICIPATE IN COMMITTEE STRATEGY MEETING AND FOLLOW-UP RE THE SAME (1.2); CONFER WITH E. GOODMAN AND J. MEYERS RE I. LEFKOWITZ DEPOSITION STRATEGY AND ANALYZE OUTLINE FOR THE SAME (1.3); COORDINATE TRIAL PREPARATION WITH TEAM (.4); PREPARE FOR I. LEFKOWITZ DEPOSITION (.8)	5.00	6,250.00
02/06/24	WELLS	COORDINATE SERVICE OF MOTION TO QUASH	0.50	240.00
02/06/24	GOODMAN	CONFERENCE CALL WITH MS. MEYERS AND MR. MOXLEY REGARDING LEFKOWITZ DEPOSITION OUTLINE	0.50	800.00
02/06/24	GOODMAN	REVIEW LEFKOWITZ DEPOSITION OUTLINE (1.0); FURTHER REVISIONS TO OBJECTION TO RULE 9019 MOTION (1.5); TELEPHONE CALL MS. MCCAFFERTY REGARDING FURTHER RESEARCH IN SUPPORT OF RULE 9019 OBJECTION (.5)	3.00	4,800.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 20

Date	Professional	Description	Hours	Value
02/07/24	GOODMAN	FURTHER REVIEW OF DEBTOR AND UCC DISCOVERY RESPONSES (.5); REVIEW DEBTOR CORRESPONDENCE REGARDING YESCARE DOCUMENTS (.5); EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (2.0); DRAFT AND EDIT RESPONSE TO DISCOVER EMAIL (1.0); TELEPHONE CALL WITH MR. MOXLEY REGARDING DISCOVERY EMAIL AND RELATED MATTERS (.3)	4.30	6,880.00
02/07/24	CICERO	CONTINUED WORK ON DEPOSITION PREPARATION FOR LEFKOWITZ	4.10	6,150.00
02/07/24	MCCAFFERTY	FINALIZE AND SERVE SUBPOENAS FOR WITNESS DEPOSITIONS (.4); PREPARE FOR LEFKOWITZ DEPOSITION (.3)	0.70	665.00
02/07/24	CALHOUN	PREPARING MATERIALS FOR DEPOSITION ON 2/8	1.80	1,251.00
02/07/24	CALHOUN	COORDINATING MATERIALS, EXHIBITS, AND LOGISTICS FOR 2/8 DEPOSITION WITH COURT REPORTER	0.70	486.50
02/07/24	CALHOUN	ANALYZING DISCOVERY DOCUMENTS FROM RECENT PRODUCTION OF YESCARE	2.30	1,598.50
02/07/24	CALHOUN	DRAFTING ADDITIONAL SUBPOENAS AND DISCOVERY DOCUMENTS	0.70	486.50
02/07/24	CALHOUN	ANALYZING DEBTORS' 10TH PRODUCTION OF DISCOVERY DOCUMENTS	0.50	347.50
02/07/24	BURNS	COORDINATING WITH PROCESS SERVER FOR SERVICE OF SUBPOENA ON D. GEFNER	0.30	150.00
02/07/24	MEYERS	PREPARE OUTLINE AND EXHIBITS FOR LEFKOWITZ DEPOSITION	1.00	1,060.00
02/07/24	SIEGER-GRIMM	REVIEW CORRESPONDENCE RE: DISCOVERY ISSUES	0.40	480.00
02/07/24	MOXLEY	PREPARE FOR I. LEFKOWITZ DEPOSITIONS IN INDIVIDUAL CAPACITY AND AS M2 LOANCO LLC DESIGNEE AND ATTENTION TO SERVICE OF THIRD-PARTY SUBPOENAS	4.00	5,000.00
02/08/24	GOODMAN	DRAFT AND EDIT CONTENT FOR OPENING SLIDES (3.1); COMMUNICATIONS WITH MR. CALHOUN REGARDING OPENING PRESENTATION (.1); COMMUNICATIONS WITH MR. MOXLEY REGARDING LEFKOWITZ DEPOSITION (.1)(.1)(.1)(.2)	3.70	5,920.00
02/08/24	MCCAFFERTY	PREPARE EXHIBITS AND CIRCULATE TO DEPOSITION COUNSEL DURING DEPOSITION OF LEFKOWITZ (1.1); ATTEND DEPOSITION OF LEFKOWITZ (2.1); RESEARCH IN SUPPORT OF OPPOSITION TO 9019 MOTION (.7)	3.90	3,705.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 21

Date	Professional	Description	Hours	Value
02/08/24	CALHOUN	COORDINATING DEPOSITION LOGISTICS/EXHIBITS WITH COURT REPORTER	0.20	139.00
02/08/24	SIEGER-GRIMM	REVIEW STINSON REMOVAL MOTION (.9) FOLLOW UP WITH TEAM RE: SAME (.4)	1.30	1,560.00
02/08/24	MOXLEY	COORDINATE WITH J. MEYERS AND G. CICERO ON I. LEFKOWITZ DEPOSITION PREPARATION, PARTICIPATE IN I. LEFKOWITZ DEPOSITION AS INDIVIDUAL AND AS M2 LOANCO LLC DESIGNEE, AND FOLLOW-UP WITH E. GOODMAN AND TEAM RE THE SAME	10.50	13,125.00
02/08/24	MOLTON	COMMUNICATE WITH TEAM RE UPDATE FROM DEPOSITION OF I LEFKOWITZ	0.80	1,800.00
02/08/24	CALHOUN	ATTENDING ISAAC LEFKOWITZ DEPOSITION	7.00	4,865.00
02/08/24	CICERO	PREPARE FOR M2 DEPOSITION (3); PARTICIPATE IN M2 AND LEFKOWITZ DEPOSITIONS (7.5); DEBRIEF WITH LITIGATION TEAM RE SAME (1.7)	12.20	18,300.00
02/08/24	MEYERS	PREPARE FOR, ATTEND, AND CONDUCT DEPOSITION OF ISAAC LEFKOWITZ IN HIS INDIVIDUAL CAPACITY AND DISCUSS FOLLOW-ON ACTION ITEMS AS A RESULT OF SAME	8.50	9,010.00
02/08/24	BURNS	ARRANGE FOR PROCESS SERVER TO SERVE DEPOSITION SUBPOENA ON A. NORRIS (.4); COORDINATE WITH E. CALHOUN TO ESTABLISH DATABASE TO MAINTAIN LEFKOWITZ DEPOSITION EXHIBITS (.5)	0.90	450.00
02/09/24	MCCAFFERTY	RESEARCH IN SUPPORT OF OPPOSITION TO RULE 9019 MOTION (2.3); DRAFT ARGUMENTS REGARDING ALTER EGO AND COLLATERAL ESTOPPEL IN SUPPORT OF OPPOSITION TO RULE 9019 MOTION (1.0); STRATEGIZE WITH S. SIEGER-GRIMM REGARDING OPPOSITION TO MOTION TO TRANSFER MOTION TO QUASH (.4)	3.70	3,515.00
02/09/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING RULE 30(B)(6) DEPOSITION AND RELATED MATTERS (.5); COMMUNICATIONS WITH MR. MOXLEY REGARDING DEPOSITIONS AND RELATED MATTERS (.5)	1.00	1,600.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 22

Date	Professional	Description	Hours	Value
02/09/24	SIEGER-GRIMM	MULTIPLE DISCUSSIONS WITH E. GOODMAN, C. MOXLEY AND J. MILIBAND RE: RESPONSE TO MOTION TO TRANSFER (.1), (.1), (.2), (.1), (.3), (.2), (.1); ANALYSIS AND DISCUSSION OF LEGAL RESEARCH RE: MOTION TO TRANSFER (.4); REVIEW FILINGS RE: MOTION TO QUASH (.7); RESEARCH RE: CASES CITED BY STINSON (1.9); DRAFT OBJECTION TO MOTION TO REMOVE (2.9)	7.00	8,400.00
02/09/24	MOXLEY	ANALYZE MOTION TO TRANSFER VENUE AND COORDINATE WITH J. MILIBAND, E. GOODMAN, AND S. SIEGER-GRIMM ON STRATEGY WITH RESPECT TO THE SAME	0.80	1,000.00
02/09/24	MOXLEY	REVIEW DRAFT OBJECTION TO RULE 9019 MOTION AND COORDINATE WITH TEAM REGARDING PREPARATION FOR TRIAL	0.80	1,000.00
02/09/24	BURNS	EMAIL/PHONE CALL RE SERVICE OF PROCESS OF THE D. GEFNER AND A. NORRIS SUBPOENAS	0.30	150.00
02/09/24	BURNS	RETRIEVE TRANSCRIPT/EXHIBITS FROM LEFKOWITZ 1.31 DEPOSITION (.4); SAVE TO DATABASE (.3), CIRCULATE SAME TO TEAM (.2)	0.90	450.00
02/09/24	CALHOUN	COORDINATING SERVICE OF PROCESS WITH PROCESS SERVER	0.30	208.50
02/09/24	WELLS	FINALIZE AND FILE NOTICE OF FILING PROOF OF SERVICE RE: MOTION TO QUASH SUBPOENA	0.70	336.00
02/10/24	MCCAFFERTY	RESEARCH IN SUPPORT OF ARGUMENT ON ALTER EGO LIABILITY AND SETTLEMENT COMPLEXITY IN SUPPORT OF OPPOSITION TO RULE 9019 MOTION (1.8); DRAFT ARGUMENT REGARDING ALTER EGO LIABILITY IN SUPPORT OF RULE 9019 MOTION (.7)	2.50	2,375.00
02/10/24	MOXLEY	PREPARE FOR BARTON, PERRY, AND DUNDON DEPOSITIONS	3.00	3,750.00
02/11/24	MCCAFFERTY	RESEARCH PROTECTIVE ORDER PROCESS AND DRAFT AGREEMENT TO BE BOUND (.6); PREPARE SUBPOENAS TO DORRIS FOR SERVICE (.4); RESEARCH IN SUPPORT OF OPPOSITION TO MOTION TO TRANSFER MOTION TO QUASH (1.1)	2.10	1,995.00
02/11/24	VEILLEUX	EXPORT DATA SET FROM DATABASE PER CASE TEAM SPECIFICATIONS	0.40	206.00
02/11/24	SIEGER-GRIMM	OUTLINE / DRAFT OBJECTION TO TRANSFER MOTION	3.80	4,560.00
02/11/24	MOXLEY	PREPARE FOR DEPOSITIONS OF UCC AND DEBTOR	1.80	2,250.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 23

Date	Professional	Description	Hours	Value
02/12/24	MCCAFFERTY	STRATEGIZE WITH PROVINCE REGARDING GEFNER DEPOSITION (.4); COORDINATE SERVICE OF SUBPOENAS TO YESCARE COUNSEL (.5); COORDINATE SERVICE OF SUBPOENAS AND NOTICE OF SUBPOENAS TO COUNSEL (.8); COORDINATE MEETING WITH FTI CAPITAL ADVISORS COUNSEL REGARDING SUBPOENA (.4); RESEARCH IN SUPPORT OF OPPOSITION TO MOTION TO QUASH (5.4); DRAFT ARGUMENT IN SUPPORT OF OPPOSITION TO MOTION TO QUASH (2.3); REVISE OPPOSITION TO MOTION FOR 9019 SETTLEMENT (.4); PREPARE EXHIBITS AND QUESTIONS FOR DEPOSITION OF GEFNER (.9)	11.10	10,545.00
02/12/24	CASTANO	WORKING THROUGH AND STRATEGIZING THE DRAFT OPENING SLIDES FOR TRIAL WITH E. GOODMAN	1.00	645.00
02/12/24	VEILLEUX	QUERY DATABASE PER CASE TEAM SPECIFICATIONS AND REPORT FINDINGS	0.10	51.50
02/12/24	GOODMAN	EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (2.5); FURTHER REVIEW OF CASE LAW IN SUPPORT OF OBJECTION TO RULE 9019 MOTION (2.8); COMMUNICATIONS WITH MR. ZIMMERMAN REGARDING RULE 30(B)(6) DEPOSITION (.2)(.2); TELEPHONE CALL WITH MR. MOXLEY REGARDING DEPOSITIONS (.5); REVIEW JOINDERS IN SUPPORT OF MOTION TO DISMISS AND RELATED EXHIBITS (.5)	6.70	10,720.00
02/12/24	SIEGER-GRIMM	DRAFT AND REVISE OBJECTION TO TRANSFER MOTION (10.9); RESEARCH RE: UCC CITED CASES (1.1); RESEARCH RE: COMPLEXITY FACTOR FOR RULE 45(F) ANALYSIS (.9)	12.90	15,480.00
02/12/24	CALHOUN	ATTENDING DEPOSITION OF SCOTT GRIFFITHS	7.10	4,934.50
02/12/24	MOXLEY	PREPARE FOR UCC AND DEBTOR DEPOSITIONS (5.5); REVISE AMENDED NOTICES OF DEPOSITIONS (.2); CONFER WITH E. GOODMAN RE CASE STRATEGY (.5); REVISE BRIEF OPPOSING MOTION TO TRANSFER VENUE ON MOTION TO QUASH UCC'S SUBPOENA (.8)	7.00	8,750.00
02/12/24	BURNS	PREPARE AMENDED NOTICES OF DEPOSITION FOR DEBTOR AND TWO NOTICES FOR UCC REPRESENTATIVE (.8); PREPARE NOTICE OF DISCOVERY REQUESTS (.5); PREPARE THE FTI SUBPOENA FOR SERVICE (.3)	1.60	800.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 24

Date	Professional	Description	Hours	Value
02/12/24	BURNS	RETRIEVE AND CIRCULATE THE LEFKOWITZ TRANSCRIPT CONTAINING EXHIBITS (.2); PERFORM MAINTENANCE ON LEFKOWITZ DEPOSITION DOCUMENT DATABASE (.3); FILE NOTICE OF DISCOVERY REQUEST (.5)	1.00	500.00
02/13/24	GOODMAN	EDIT AND REVISE OUTLINE FOR REPLY IN SUPPORT OF MOTION TO DISMISS (5.5); TELEPHONE CALL WITH MS. MCCAFFERTY REGARDING REPLY IN SUPPORT OF MOTION TO DISMISS (.7); FURTHER REVISIONS TO SCRIPT FOR OPEN ARGUMENT (1.0); TELEPHONE CALLS WITH MR. MOXLEY REGARDING DISCOVERY ISSUES (.2)(.2)	7.60	12,160.00
02/13/24	MCCAFFERTY	STRATEGIZE WITH E. GOODMAN REGARDING REPLY TO MOTION TO DISMISS (.7); DRAFT REVISIONS TO THE DECLARATION IN SUPPORT OF THE OPPOSITION TO THE MOTION TO TRANSFER (.6); DRAFT REVISIONS TO THE OPPOSITION TO THE MOTION TO TRANSFER (.5); PREPARE EXHIBITS TO OPPOSITION TO MOTION TO TRANSFER FOR FILING (.5); FINALIZE AND PREPARE OPPOSITION TO MOTION TO TRANSFER AND DECLARATION AND EXHIBITS FOR FILING (.5); MEET AND CONFER WITH FTI COUNSEL REGARDING SUBPOENA (.2); MEET AND CONFER WITH YESCARE COUNSEL REGARDING SUBPOENAS (.3); PREPARE FOR MEET AND CONFERS WITH COUNSEL (.6); RESEARCH IN SUPPORT OF SERVICE ARGUMENT RELATED TO THIRD PARTY SUBPOENAS (.8); DRAFT CORRESPONDENCE TO COUNSEL ATTACHING SUBPOENAS AND AFFIDAVITS OF SERVICE (.3); COORDINATE AFFIDAVITS OF SERVICE RELATED TO SUBPOENAS (.5); PREPARE PRO HAC VICE MOTION (.2); RESEARCH AND REVIEW DOCUMENTS IN SUPPORT OF OPPOSITION TO RULE 9019 MOTION (1.3)	7.00	6,650.00
02/13/24	SIEGER-GRIMM	REVISE OBJECTION TO TRANSFER MOTION (2.2); REVIEW DOCUMENTS AND FILINGS RE: STATEMENTS IN DECLARATION (1.1); FOLLOW UP WITH E. GOODMAN AND C. MOXLEY RE: DECLARATION AND STATEMENTS IN OBJECTION (.2); CALL WITH C. MOXLEY AND E. GOODMAN RE: SAME AND RELATED ISSUES (.4); FURTHER REVISIONS TO OBJECTION AND FINALIZE FOR FILING (1.1); DRAFT AND REVISE DECLARATION ISO OBJECTION (1.9); FURTHER REVISIONS TO DECLARATION (.7); CONFORMING UPDATES TO DOCUMENTS FOR FILING (.5); REVIEW AND SIGN OFF ON ALL DOCUMENTS FOR FILING (.6)	8.70	10,440.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 25

Date	Professional	Description	Hours	Value
02/13/24	CASTANO	CREATING OPENING SLIDES FOR TRIAL	1.00	645.00
02/13/24	MOXLEY	PREPARE FOR UCC (BARTON AND DUNDON) AND DEBTOR DEPOSITIONS (10.3); REVIEW REVISED OPPOSITION TO MOTION TO TRANSFER VENUE ON MOTION TO QUASH AND CONFER WITH E. GOODMAN AND S. SIEGER-GRIMM RE THE SAME (.7); MEET AND CONFER WITH FTI'S COUNSEL RE SUBPOENA (.2); MEET AND CONFER WITH YESCARE'S COUNSEL RE SUBPOENA AND FOLLOW-UP RE THE SAME (.3)	11.50	14,375.00
02/13/24	BURNS	EMAIL WITH PROCESS SERVER RE STATUS OF AFFIDAVIT OF SERVICE FOR D. GEFNER SUBPOENA (.3); DRAFTED NOTICE OF WITHDRAWAL OF SUBPOENA (.7)	1.00	500.00
02/13/24	WELLS	DRAFT TABLE OF AUTHORITIES, FINALIZE AND FILE OPPOSITION TO MOTION TO TRANSFER, RE: MOTION TO QUASH SUBPOENA	1.70	816.00
02/14/24	GOODMAN	EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (1.2); EDIT AND REVISE REPLY IN SUPPORT OF MOTION TO DISMISS (.8); ATTEND UCC RULE 30(B)(6) DEPOSITION (IN PART) (5.5); COMMUNICATIONS WITH MR. MOXLEY AND BROWN RUDNICK TEAM REGARDING DEPOSITIONS (.4); CONFERENCE WITH MS. MCCAFFERTY REGARDING MOTION IN LIMINE AND RELATED MATTERS (.4)	8.30	13,280.00
02/14/24	MCCAFFERTY	DRAFT LETTER REQUESTING PRODUCTION OF DOCUMENTS FROM UCC (1.8); RESEARCH IN SUPPORT OF LETTER REQUESTING PRODUCTION OF DOCUMENTS FROM UCC (1.7); PREPARE EXHIBITS FOR DEBTOR 30(B)(6) DEPOSITION (.5); DRAFT DECLARATION IN LIEU OF TESTIMONY FOR FTI (1.2); DRAFT NOTICE OF WITHDRAWAL OF SUBPOENAS TO GEFNER AND DORRIS (.5); COORDINATE SERVICE OF WITHDRAWAL OF SUBPOENA TO GEFNER (.4); ATTEND DEPOSITION OF UCC 30(B)(6) (.5)	6.60	6,270.00
02/14/24	VEILLEUX	CONFER WITH CASE TEAM REGARDING INCOMING PRODUCTIONS	0.20	103.00
02/14/24	SIEGER-GRIMM	DISCUSSION AND ANALYSIS RE: DEPOSITION / EVIDENCE REGARDING SETTLEMENT (.4); DISCUSSION WITH M. MCCAFFERTY RE: NEXT STEPS/ MIL (.3); REVIEW UCC REPLY AND DECLARATION ISO TRANSFER MOTION (.4); SUMMARY OVERVIEW TO BR TEAM (.1); POST-DECLARATION DEBRIEFING DISCUSSION (.6)	1.80	2,160.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 26

Date	Professional	Description	Hours	Value
02/14/24	MOXLEY	PREPARE FOR UCC (BARTON) DEPOSITION (1.2); DEPOSE UCC'S FIRST RULE 30(B)(6) DESIGNEE AND FOLLOW-UP WITH TEAM REGARDING THE SAME (7.5); PREPARE FOR DEBTOR (PERRY) DEPOSITION (1.7)	10.40	13,000.00
02/14/24	BURNS	FOLLOW UP PHONE CALL WITH COURT REPORTER ON GRIFFITHS DEPO TRANSCRIPT (.3) RETRIEVE AND SAVE BARTON DEPOSITION TRANSCRIPTS AND VIDEOS TO DATABASE (.7)	1.00	500.00
02/15/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR MOTION TO COMPEL (3.2); RESEARCH AND REVIEW CASE LAW IN SUPPORT OF MOTION TO COMPEL (1.5); CONFERENCE WITH MS. MCCAFFERTY REGARDING MOTION TO COMPEL (.3).	5.00	8,000.00
02/15/24	CASTANO	CREATING OPENING SLIDES FOR E. GOODMAN	6.40	4,128.00
02/15/24	BURNS	ASSISTING IN RETRIEVING (.4) AND ORGANIZING (.4) DEPOSITION EXHIBITS FOR PERRY DEPOSITION; COORDINATE WITH LOCAL DALLAS PRINTER TO PRINT AND DELIVER EXHIBITS TO C. MOXLEY (.3)	1.10	550.00
02/15/24	MOXLEY	FINALIZE OUTLINE AND PREPARATION FOR DEBTOR'S RULE 30(B)(6) DEPOSITION (6.5); CALLS WITH E. GOODMAN, P. HILKERT, AND M. MCCAFFERTY CONCERNING CASE STRATEGY AND DEPOSITION PREPARATION ISSUES (1.2)	7.70	9,625.00
02/15/24	MCCAFFERTY	DRAFT LETTER TO UCC COUNSEL REGARDING PRODUCTION OF DOCUMENTS AND PRIVILEGED COMMUNICATIONS (.8); DRAFT CORRESPONDENCE TO FTI REGARDING DECLARATION (.2); RESEARCH IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE REGARDING PRIVILEGE ASSERTIONS RELATED TO DEBTOR AND UCC INVESTIGATION OF SETTLEMENT AGREEMENT (3.1); DRAFT MOTION TO COMPEL AND MOTION IN LIMINE (1.1); PREPARE EXHIBITS FOR DEBTOR DEPOSITION (.7)	5.90	5,605.00
02/15/24	VEILLEUX	CONFER WITH CASE TEAM REGARDING INCOMING PRODUCTIONS	0.20	103.00
02/16/24	GOODMAN	REVIEW DRAFT EXPERT REPORT (1.0); EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (1.2); ATTEND DEBTOR'S RULE 30(B)(6) DEPOSITION (5.5); POST-DEPOSITION CONFERENCE WITH MR. MOXLEY (.3); COMMUNICATIONS WITH MS. MCCAFFERTY REGARDING MOTION TO COMPEL (.1); REVIEW POWERPOINT PRESENTATION FOR OPEN ARGUMENT (.3)	8.40	13,440.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 27

Date	Professional	Description	Hours	Value
02/16/24	MCCAFFERTY	RESEARCH IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE (4.2); DRAFT MOTION TO COMPEL AND MOTION IN LIMINE (4.7); PROVIDE EXHIBITS FOR DEPOSITION OF DEBTOR (.8); ATTEND DEPOSITION OF DEBTOR (.7)	10.40	9,880.00
02/16/24	MOXLEY	DEPOSE THE DEBTOR'S RULE 30(B)(6) DESIGNEE R. PERRY AND PREPARE FOR AND FOLLOW-UP WITH E. GOODMAN AND TEAM AFTER RE THE SAME	9.60	12,000.00
02/16/24	CICERO	PARTICIPATE IN R. PERRY DEPOSITION (7.0); MULTIPLE PRE AND POST CALLS RE: SUBSTANCE OF SAME (1.4)	8.40	12,600.00
02/16/24	SIEGER-GRIMM	REVIEW/ COMMENTS TO DEPOSITION OUTLINE (.6); REVIEW NY DOCKET RE: UCC FILINGS (.2); DISCUSSION AND ANALYSIS RE: UCC DEPOSITION TESTIMONY (.4)	1.20	1,440.00
02/16/24	BURNS	COORDINATE WITH PRINTER IN DALLAS FOR THE PRINTING AND DELIVERY OF ADDITIONAL EXHIBITS FOR THE PERRY DEPOSITION (.3); RETRIEVE AND SAVE TO DATABASE THE TRANSCRIPTS, EXHIBITS AND VIDEOS FROM THE PERRY AND LEFKOWITZ DEPOSITIONS (.6)	0.90	450.00
02/16/24	CASTANO	EDITS AND ADDITIONS TO THE OPENING SLIDE DECK	0.20	129.00
02/17/24	MCCAFFERTY	DRAFT MOTION TO COMPEL AND MOTION IN LIMINE	3.60	3,420.00
02/17/24	MOXLEY	CONFER WITH E. GOODMAN RE LITIGATION STRATEGY AHEAD OF HEARING ON RULE 9019 MOTION	0.20	250.00
02/17/24	CICERO	ORGANIZE DEPOSITION TESTIMONY FOR USE AT TRIAL	2.90	4,350.00
02/17/24	VEILLEUX	AUDIT DATABASE TO CONFIRM DATA SET INTEGRITY (.6); EXPORT DATA SET FROM DATABASE PER CASE TEAM SPECIFICATIONS (.3)	0.90	463.50
02/18/24	MOXLEY	ANALYZE COMMENTS TO DRAFT FTI DECLARATION AND EMAIL WITH E. GOODMAN AND M. MCCAFFERTY RE SAME	0.10	125.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 28

Date	Professional	Description	Hours	Value
02/19/24	MCCAFFERTY	PREPARE EXHIBITS FOR DEPOSITION OF UCC WITNESS DUNDON (.7); DRAFT REVISIONS TO FTI DECLARATION (.8); RESEARCH IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE (2.3); REVIEW DEPOSITION TRANSCRIPT OF UCC WITNESS BARTON AND DRAFT SUMMARIES OF TESTIMONY IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE (1.8); REVIEW DEPOSITION TRANSCRIPT OF DEBTOR WITNESS R. PERRY AND DRAFT SUMMARIES OF TESTIMONY IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE (1.3); DRAFT MOTION TO COMPEL AND MOTION IN LIMINE (3.4)	10.30	9,785.00
02/19/24	CASTANO	REVIEWING AND EDITING OPENING SLIDES WITH E. GOODMAN AND G. CICERO	1.10	709.50
02/19/24	GOODMAN	EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (5.3); CONFERENCE CALL WITH MR. CICERO AND MS. CASTANAO REGARDING PRESENTATION FOR OPENING ARGUMENT (.7); CONFERENCE CALL WITH BROWN RUDNICK TEAM AND ADVISORS REGARDING ANALYSIS OF ESTATE CAUSES OF ACTION, DISCOVERY, AND RELATED MATTERS (2.0); FURTHER REVIEW OF DEPOSITION TRANSCRIPTS IN SUPPORT OF OBJECTION TO RULE 9019 MOTION (3.3)	11.30	18,080.00
02/19/24	CICERO	MEETING WITH TEAM RE: OPENING STRATEGY FOR R. 9019 MOTION (.9); MEETING WITH TEAM RE: TRIAL STRATEGY AND COORDINATION OF EVIDENCE (2.0); ORGANIZE DEPOSITION TESTIMONY FOR USE AT TRIAL (1.6)	4.50	6,750.00
02/19/24	SIEGER-GRIMM	DISCUSSION AND ANALYSIS RE: HEARING PREPARATION AND DEPOSITION TESTIMONY (1.4); REVIEW NY DOCKET RE: UCC RESPONSE TO MOTION TO QUASH (.2); REVIEW UCC RESPONSE (.4); EMAILS AND FOLLOW UP RE: SAME (.2); DISCUSSION WITH C. MOXLEY AND M. MCCAFFERTY RE: REPLY ISO MOTION TO QUASH (.4); DRAFT REPLY ISO MOTION TO QUASH (2.2)	4.80	5,760.00
02/19/24	MOXLEY	PREPARE FOR DEPOSITION OF UCC DESIGNEE M. DUNDON (5.0); REVIEW DRAFT OPPOSITION TO MOTION TO QUASH AND ATTENTION TO DRAFT REPLY TO THE SAME (.7); CONFER WITH E. GOODMAN RE CASE STRATEGY AND DEPOSITION PREPARATION (1.5); REVIEW DRAFT FTI DECLARATION (.2)	7.40	9,250.00
02/20/24	CICERO	ATTEND PORTIONS OF M. DUNDON DEPOSITION (1.5); DRAFT OPENING ARGUMENT OUTLINE AND PPT (5.2)	6.70	10,050.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 29

Date	Professional	Description	Hours	Value
02/20/24	MCCAFFERTY	RESEARCH IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE FOR 9019 HEARING (4.4); DRAFT MOTION TO COMPEL AND MOTION IN LIMINE FOR 9019 HEARING (5.1); FINALIZE AND FILE REPLY IN SUPPORT OF MOTION TO COMPEL (.7); REVIEW DEPOSITION TESTIMONY OF BARTON, PERRY, AND DUNDON IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE (1.8)	12.00	11,400.00
02/20/24	CASTANO	MAKING EDITS TO THE OPENING SLIDES AND ADDING VARIOUS EXCERPTS FOR G. CICERO AND E. GOODMAN	7.20	4,644.00
02/20/24	CALHOUN	STRATEGIZING WITH CO-COUNSEL REGARDING MOTION TO COMPEL	0.20	139.00
02/20/24	CALHOUN	REVIEWING DRAFT OF MOTION TO COMPEL	0.50	347.50
02/20/24	GOODMAN	EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (5.5); ATTEND DUNDON DEPOSITION (2.0); COMMUNICATIONS WITH MR. MOXLEY REGARDING DUNDON DEPOSITION AND RELATED MATTERS (.4)	7.90	12,640.00
02/20/24	SIEGER-GRIMM	REVIEW COMMENTS AND REVISE / UPDATE REPLY ISO MOTION TO QUASH (2.1); FURTHER UPDATES FOR FILING (.6); DRAFT DECLARATION IN SUPPORT (.7); FOLLOW UP RE: NECESSITY OF DECLARATION (.1); REVIEW/COMMENTS TO 9019 OBJECTION (2.1); REVIEW YESCARE DISCOVERY OBJECTIONS AND RESPONSES (.3)	5.90	7,080.00
02/20/24	CALHOUN	DRAFTING SECTIONS OF MOTION TO COMPEL AND FOR SANCTIONS	3.10	2,154.50
02/20/24	WELLS	FINALIZE AND FILE REPLY, RE: MOTION TO QUASH SUBPOENA	0.70	336.00
02/20/24	BURNS	DRAFT AMENDED NOTICE OF DISCOVERY REGARDING UPDATED STATUS OF GEFNER, DORRIS AND YES CARE SUBPOENAS (.9); RETRIEVE TRANSCRIPTS, EXHIBITS AND VIDEOS FROM DUNDON DEPOSITION AND SAVE TO DATABASE (.8); RETRIEVE AND CIRCULATE DUNDON TRANSCRIPT WITH EXHIBITS TO TEAM (.2)	1.90	950.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 30

Date	Professional	Description	Hours	Value
02/20/24	MOXLEY	PREPARE FOR UCC RULE 30(B)(6) DEPOSITION OF M. DUNDON (.6); DEPOSE UCC DESIGNEE M. DUNDON (3.5); CALLS WITH E. GOODMAN AND M. MCCAFFERTY RE DEPOSITION AND TRIAL ISSUES (1.0); PREPARE FOR YESCARE DEPOSITION (.4); REVIEW REPLY IN FURTHER SUPPORT OF MOTION TO QUASH SUBPOENA TO BROWN RUDNICK (.2); PREPARE STRATEGY FOR TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS (.8); REVIEW YESCARE RESPONSES AND OBJECTIONS TO SUBPOENA (.3)	6.80	8,500.00
02/20/24	VLACHOS	LOCATE AND OBTAIN TRANSCRIPT OF ORAL HEARING	0.30	133.50
02/21/24	CICERO	CONDUCT DOCUMENT REVIEW AND DISCOVERY (4.5); DRAFT AND REVISE OBJECTION TO RULE 9019 OBJECTION (3.1); CALL WITH E. GOODMAN RE: SAME (.2)	7.80	11,700.00
02/21/24	GOODMAN	CONFERENCE CALL WITH MR. MOXLEY REGARDING UCC TESTIMONY AND TRIAL STRATEGY (1.0); CONFERENCE WITH MS. CASTANO AND MR. CICERO REGARDING HEARING PRESENTATION (1.0); CONFERENCE CALL WITH THE UNITED STATES TRUSTEE REGARDING OBJECTION TO RULE 9019 MOTION (.5); CONFERENCE CALL WITH MR. ZIMMERMAN AND MR. MOXLEY REGARDING HEARING ON MOTIONS (.4); EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (6.8); FURTHER REVIEW OF CASE LAW IN SUPPORT OF OBJECTION TO RULE 9019 MOTION (2.0); TELEPHONE CALL WITH MR. MOXLEY REGARDING MOTION TO COMPEL AND RELATED MATTERS (.4); CONFERENCE WITH MR. ATKINSON REGARDING REPORT (.3)	12.40	19,840.00
02/21/24	MCCAFFERTY	RESEARCH CASE LAW IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE (2.7); DRAFT MOTION TO COMPEL AND MOTION IN LIMINE (2.6); DRAFT REVISIONS TO 9019 MOTION OBJECTION (.6); REVIEW DEBTOR'S PRODUCTION TO IDENTIFY EXHIBITS IN SUPPORT OF 9019 OBJECTION (1.5)	7.40	7,030.00
02/21/24	CASTANO	ADDITIONAL EDITS TO THE OPENING SLIDES	1.30	838.50
02/21/24	CASTANO	MEETING WITH E. GOODMAN AND G. CICERO RE REVIEWING OPENING SLIDES, AND IMPLEMENTING ERIC'S EDITS AND GERARD'S EDITS	1.80	1,161.00
02/21/24	SIEGER-GRIMM	FURTHER REVIEW/COMMENTS TO 9019 OBJECTION	3.90	4,680.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 31

Date	Professional	Description	Hours	Value
02/21/24	CALHOUN	DRAFTING SECTION/OUTLINE OF DUNDEN DEPOSITION FOR MOTION TO COMPEL	1.50	1,042.50
02/21/24	CALHOUN	ANALYZING DUNDEN DEPOSITION TRANSCRIPT	0.60	417.00
02/21/24	MOXLEY	COMMENT ON DRAFT OBJECTION TO RULE 9019 MOTION (4.6); CALLS WITH E. GOODMAN REGARDING OBJECTION, DEPOSITION PREPARATION, AND TRIAL STRATEGY (2.3); PREPARE FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION (1.5)	8.40	10,500.00
02/21/24	CALHOUN	ANALYZING DISCOVERY PRODUCTIONS	0.60	417.00
02/21/24	BURNS	MAINTENANCE ON DATABASE CONTAINING TRANSCRIPTS, EXHIBITS, AND VIDEOS FROM THE BARTON, LEFKOWITZ, DUNDON AND PERRY DEPOSITIONS	0.90	450.00
02/21/24	WELLS	ASSEMBLE COURTESY COPIES OF MOTION TO QUASH SUBPOENA AND COORDINATE SUBMISSION OF SAME	0.70	336.00
02/21/24	VEILLEUX	QUERY DATABASE PER CASE TEAM SPECIFICATIONS AND REPORT FINDINGS (.4); CONFER WITH CASE TEAM REGARDING INCOMING DATASETS AND SEARCH RESULTS (.8)	1.20	618.00
02/22/24	GOODMAN	CONFERENCE CALL WITH MS. CASTANO REGARDING OPENING PRESENTATION (.3); TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING OBJECTION TO RULE 9019 MOTION AND RELATED MATTERS (.5); TELEPHONE CALL WITH MR. ATKINSON REGARDING REPORT (.3); EDIT AND REVISE OBJECTION TO RULE 9019 MOTION (5.5); FURTHER REVIEW OF CASE LAW IN SUPPORT OF OBJECTION TO RULE 9019 MOTION (1.5); REVIEW DRAFT EXPERT REPORT (1.2); TELEPHONE CALLS WITH MR. MOXLEY REGARDING CASE STATUS, DISCOVERY, AND TRIAL PREPARATION (1.0)	10.30	16,480.00
02/22/24	MCCAFFERTY	RESEARCH IN SUPPORT OF LETTER TO DEBTOR (1.3) DRAFT LETTER TO DEBTOR REGARDING DISCOVERY RESPONSES (.8); RESEARCH IN SUPPORT OF OBJECTION TO RULE 9019 MOTION (.9); DRAFT REVISIONS TO OBJECTION TO RULE 9019 MOTION (.5); STRATEGIZE WITH PRE-TRIAL PREPARATION TEAM (.8); IDENTIFY DOCUMENTS FOR EXHIBIT LIST AND DRAFT EXHIBIT LIST (1.5); IDENTIFY AND PREPARE EXHIBITS TO OBJECTION TO RULE 9019 MOTION FOR FILING (.4)	6.20	5,890.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 32

Date	Professional	Description	Hours	Value
02/22/24	CICERO	REVISE 9019 OBJECTION (3.8); REVIEW DOCKET RELATED TO 9019 MOTION AND MOTION TO DISMISS FOR FILINGS RE: SAME (.9); CONDUCT DOCUMENT REVIEW RE: SAME (2.4)	7.10	10,650.00
02/22/24	CASTANO	MEETING WITH E. GOODMAN TO REVIEW AND CONTINUE WITH EDITS ON THE OPENING SLIDES	0.40	258.00
02/22/24	MOXLEY	REVIEW DRAFT M. ATKINSON REPORT AND CONFER WITH E. GOODMAN RE THE SAME (1.0); REVISE DRAFT PRE-TRIAL MOTION IN LIMINE AND MOTION TO COMPEL (2.0); PREPARE FOR HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS AND CALLS WITH E. GOODMAN RE THE SAME (4.2); CONFER WITH G. CICERO AND M. MCCAFFERTY ON DRAFT EXHIBIT LIST (.8)	8.00	10,000.00
02/22/24	HESTER	RETRIEVE AND ORGANIZE DOCUMENTS FOR PROPOSED EXHIBIT LIST	1.00	385.00
02/22/24	SIEGER-GRIMM	REVIEW AND ANALYSIS OF NEW FILINGS (.9); REVIEW DOCKET RE: CLAIM OBJECTIONS (.3)	1.20	1,440.00
02/22/24	CALHOUN	WORKING ON POTENTIAL EXHIBIT LISTS WITH CO-COUNSEL FOR UPCOMING HEARING	1.00	695.00
02/22/24	CALHOUN	STRATEGIZING POTENTIAL EXHIBITS FOR TRIAL WITH T. BURNS AND MCCAFFERTY	0.20	139.00
02/22/24	BURNS	CONFER WITH E. CALHOUN AND M. MCCAFFERTY REGARDING THE FILING OF THE OBJECTION TO RULE 9019 MOTION (.5); COLLECT AND PREPARE EXHIBITS FOR FILING THE EXHIBITS TO THE OBJECTION TO RULE 9019 MOTION (.9)	1.40	700.00
02/22/24	VEILLEUX	CONFER WITH CASE TEAM REGARDING INCOMING PRODUCTIONS (.2); EXPORT DATA SET FROM DATABASE PER CASE TEAM SPECIFICATIONS (.1)	0.30	154.50
02/23/24	GOODMAN	FINALIZE OBJECTION TO RULE 9019 MOTION (4.0); CONFERENCE WITH MR. ATKINSON IN PREPARATION FOR DEPOSITION (.7); REVIEW THE DEBTOR'S AND THE UCC'S OBJECTION TO MOTION TO DISMISS (1.5); CONFERENCE WITH MR. CICERO AND MR. MOXLEY REGARDING REPLY BRIEF AND MOTION IN LIMINE (1.5)	7.70	12,320.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 33

Date	Professional	Description	Hours	Value
02/23/24	MCCAFFERTY	PREPARE EXHIBITS TO OBJECTION TO 9019 MOTION FOR FILING (1.6); FINALIZE OBJECTION TO RULE 9019 MOTION FOR FILING (1.3); SERVE EXHIBITS AND SEALED MOTION ON DEBTOR AND UCC (.6); DRAFT AND SERVE LETTER TO DEBTOR REGARDING DISCOVERY RESPONSES (.8); DRAFT PROPOSED REVISIONS TO MOTION TO COMPEL AND MOTION IN LIMINE (.7); PREPARE EXHIBIT AND WITNESS LIST FOR HEARING (.6)	5.60	5,320.00
02/23/24	HESTER	RETRIEVE AND ORGANIZE DOCUMENTS FOR PROPOSED EXHIBIT LIST	2.00	770.00
02/23/24	CICERO	FINALIZE AND ASSIST IN FILING 9019 OBJECTION (3.2); REVIEW AND ANALYZE OBJECTIONS TO MOTIONS TO DISMISS AS WELL AS SUPPORTING PAPERS (2.5); STRATEGY CALL RE: REPLY FILING WITH E. GOODMAN AND D. MOXLEY (2.3)	8.00	12,000.00
02/23/24	SIEGER-GRIMM	REVIEW FILINGS RE: MOTION TO DISMISS AND SETTLEMENT MOTION (4.6); MULTIPLE EMAILS TO COUNSEL RE: FILED JOINDERS AND STATEMENTS (.3)	4.90	5,880.00
02/23/24	SIEGER-GRIMM	NY DOCKET REVIEW RE: ENTRY OF ORDER (.2); REVIEW OF ORDER GRANTING TRANSFER MOTION (.3); FOLLOW UP WITH BR TEAM RE: SAME (.3); ANALYSIS RE: NEXT STEPS (.4); FOLLOW UP WITH D. MOLTON AND G. CICERO RE: SAME (.1); FOLLOW UP WITH FIRM COUNSEL RE: NEXT STEPS RE: MOTION TO QUASH (.3)	1.60	1,920.00
02/23/24	MOXLEY	REVISE DRAFT MOTION IN LIMINE/MOTION TO COMPEL (8.0); PREPARE FOR HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (2.0); PREPARE FOR YESCARE DEPOSITION (2.0); ANALYZE OBJECTIONS TO MOTION TO DISMISS AND CONFER WITH E. GOODMAN AND G. CICERO RE THE SAME (2.3)	14.30	17,875.00
02/23/24	BURNS	AMENDED NOTICE OF DISCOVERY FILED (.5); PREPARE OBJECTION TO RULE 9019 MOTION FOR FILING (.5); FILE OBJECTION TO 9019 MOTION (.5); FILE SEALED OBJECTION TO RULE 9019 MOTION (.8)	2.30	1,150.00
02/23/24	QUIJANO	COLLECTING DOCUMENTS FOR EXHIBIT LIST AND PREPARATION OF TRIAL	3.00	1,155.00
02/23/24	BURNS	RETRIEVE AND ADD DOCUMENTS TO DATABASE AND UPDATE DRAFT OF EXHIBIT LIST FOR MARCH 1, 2024 HEARING	1.00	500.00
02/24/24	MCCAFFERTY	RESEARCH IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE	0.50	475.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 34

Date	Professional	Description	Hours	Value
02/24/24	CICERO	REVIEW AND ANALYZE OBJECTIONS TO MOTION TO DISMISS (2.5); REVIEW RECORD AND DEPO TRANSCRIPTS FOR REPLY (1.8); DRAFT REPLY (6.7)	11.00	16,500.00
02/24/24	GOODMAN	EDIT AND REVISE MOTION TO COMPEL AND IN LIMINE	3.20	5,120.00
02/24/24	MOXLEY	REVIEW COMMENTS TO DRAFT MOTION IN LIMINE/MOTION TO COMPEL	0.10	125.00
02/25/24	MCCAFFERTY	REVISE DRAFT OF MOTION IN LIMINE AND MOTION TO COMPEL (1.8); PREPARE EXHIBIT AND WITNESS LIST (.9)	2.70	2,565.00
02/25/24	CICERO	DRAFT REPLY (11.5); CALL WITH E. GOODMAN RE: REPLY (.3)	11.80	17,700.00
02/25/24	HESTER	ADD DOCS TO EXHIBIT LIST	1.00	385.00
02/25/24	SIEGER-GRIMM	DOCUMENT REVIEW AND SUMMARY RE: DEPOSITION PREP	1.90	2,280.00
02/25/24	SIEGER-GRIMM	REVIEW AND ANALYSIS OF DISCOVERY REQUESTS RE: MOTION TO QUASH NEXT STEPS	2.40	2,880.00
02/25/24	MOXLEY	DRAFT OUTLINE FOR YESCARE RULE 30(B)(6) DEPOSITION (4.6); PREPARE FOR M. ATKINSON DEPOSITION AND CONFER WITH M. ATKINSON AND G. CICERO RE THE SAME (1.3)	5.90	7,375.00
02/26/24	CICERO	ATTEND DEPOSITION OF M. ATKINSON AND PROVIDE ASSISTANCE TO D. MOXLEY THROUGH SAME	7.90	11,850.00
02/26/24	MCCAFFERTY	DRAFT REVISIONS TO MOTION TO COMPEL AND MOTION IN LIMINE (2.3); PREPARE EXHIBITS FOR FILING WITH MOTION TO COMPEL AND MOTION IN LIMINE (1.6); DRAFT REVISIONS TO REPLY IN SUPPORT OF MOTION TO DISMISS (1.4); PREPARE EXHIBITS FOR FILING WITH REPLY IN SUPPORT OF MOTION TO DISMISS (1.3); DRAFT EXHIBIT AND WITNESS LIST AND PREPARE EXHIBITS FOR HEARING (1.8)	8.40	7,980.00
02/26/24	GOODMAN	EDIT AND REVISE REPLY IN SUPPORT OF MOTION TO DISMISS	3.10	4,960.00
02/26/24	MOXLEY	PREPARE FOR M. ATKINSON DEPOSITION (1.0); DEFEND M. ATKINSON DEPOSITION (8.5); MEET AND CONFER WITH DEBTOR AND UCC COUNSEL RE DISCOVERY ISSUES (.2); CALLS WITH E. GOODMAN, J. MEYERS, D. MOLTON, AND M. MCCAFFERTY REGARDING DEPOSITION STATUS AND CASE STRATEGY (.6); REVISE DRAFT MOTION IN LIMINE/MOTION TO COMPEL AND CONFER WITH M. MCCAFFERTY RE THE SAME (2.2); PREPARE FOR YESCARE DEPOSITION (.3)	12.80	16,000.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 35

Date	Professional	Description	Hours	Value
02/26/24	HESTER	COMPILE EXHIBIT LIST	2.00	770.00
02/26/24	BURNS	ARRANGE FOR DEPOSITION EXHIBITS TO BE PRINTED AND DELIVERED TO NASHVILLE FOR 2/27/24 YESCARE DEPOSITION (.5); ARRANGE FOR HOTEL TO RECEIVE DELIVERY AND HOLD DOCUMENTS FOR C. MOXLEY (.3); CONFER WITH M. MCCAFFERTY REGARDING EXHIBITS FROM GRIFFITHS DEPOSITION (.3); RETRIEVE AND ORGANIZE EXHIBITS FOR EXHIBIT LIST FOR MARCH 1, 2024 EVIDENTIARY HEARING (2.1)	3.20	1,600.00
02/26/24	MEYERS	DISCUSS LOGISTICS FOR TRIAL AND OPEN ACTION ITEMS; REVIEW AND PROPOSE ADDITIONS TO DRAFT WITNESS AND EXHIBIT LIST; PREPARE DEPOSITION DESIGNATIONS FOR LEFKOWITZ DEPOSITION	3.80	4,028.00
02/26/24	VEILLEUX	EXPORT DATA SET FROM DATABASE PER CASE TEAM SPECIFICATIONS	0.60	309.00
02/26/24	SIEGER-GRIMM	REVIEW AND ANALYSIS OF MOTION TO QUASH ISSUES / OUTLINE POTENTIAL NEXT STEPS (4.3); FOLLOW UP RE: PRO HAC VICE MOTION (.2)	4.50	5,400.00
02/26/24	SIEGER-GRIMM	DRAFT OUTLINE FOR DIRECT FOR M. ATKINSON AS EXPERT WITNESS	3.40	4,080.00
02/27/24	CICERO	CALLS WITH M. MCCAFFERTY RE: FINALIZING MOTION IN LIMINE AND RELATED WORK PRODUCT (.5); FINALIZE MOTION IN LIMINE AND RELATED FILINGS (1.8)	2.30	3,450.00
02/27/24	MCCAFFERTY	DRAFT EXHIBIT AND WITNESS LIST FOR HEARING (3.5); PREPARE EXHIBITS FOR HEARING (2.7); DRAFT REVISIONS TO MOTION TO COMPEL AND MOTION IN LIMINE FOR FILING (1.1); REDACT MOTION TO COMPEL AND MOTION IN LIMINE FOR FILING (.4); REVISE REPLY IN SUPPORT OF MOTION TO DISMISS FOR FILING (1.0); PREPARE EXHIBITS FOR MOTION TO COMPEL AND IN LIMINE AND REPLY IN SUPPORT OF MOTION TO DISMISS FOR FILING (1.5)	10.20	9,690.00
02/27/24	QUIJANO	PREPARING FINAL EXHIBITS FOLDER AND EXHIBIT LIST	5.00	1,925.00
02/27/24	SIEGER-GRIMM	REVIEW MOTION IN LIMINE/MOTION TO COMPEL RE: FINAL EDITS AND REDACTIONS (1.1); CALL RE: FILINGS FOR THE DAY (.3); REDACT AND FINALIZE DOCUMENTS FOR FILING (3.6); FOLLOW UP RE: SAME (.2)	5.20	6,240.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 36

Date	Professional	Description	Hours	Value
02/27/24	SIEGER-GRIMM	CALL WITH J. MILIBAND RE: MOTION TO COMPEL NEXT STEPS (.2); FOLLOW UP WITH TEHUM TEAM RE: SAME (.2); REVIEW TRANSFER ORDER AND DOCKETS RE: ACTIONS TO BE TAKEN RE: TRANSFER (.4)	0.80	960.00
02/27/24	VEILLEUX	EXPORT DATA SET FROM DATABASE PER CASE TEAM SPECIFICATIONS	0.20	103.00
02/27/24	MEYERS	RESEARCH AND DRAFT MOTION TO COMPEL LEFKOWITZ COMPLIANCE WITH TRIAL SUBPOENA; REVISE DRAFT WITNESS AND EXHIBIT LIST TO INCLUDE DEPOSITION DESIGNATIONS FOR LEFKOWITZ	5.50	5,830.00
02/27/24	CALHOUN	ASSISTING WITH POTENTIAL EXHIBIT LISTS	0.30	208.50
02/27/24	HESTER	COMPILE EXHIBIT LIST DOCUMENTS	4.00	1,540.00
02/27/24	HESTER	ATTEND EXHIBIT LIST TEAM MEETING	0.30	115.50
02/27/24	WELLS	REVIEW REPLY IN SUPPORT OF MOTION TO DISMISS AND DRAFT TABLE OF AUTHORITIES TO SAME	1.00	480.00
02/27/24	BURNS	DOWNLOAD VIDEOS FROM RECENT DEPOSITIONS, SAVE TO DATABASE, REVIEW PERRY, LEFKOWITZ, LEFKOWITZ 30(6)(B), DUNDON, BARTON DEPOSITION FILES IN DATABASE TO ENSURE THEY CONTAIN ALL VIDEOS FOR MARCH 1, 2024 EVIDENTIARY HEARING (.7); CALL WITH M. MCCAFFERTY AND EXHIBIT LIST TEAM TO DISCUSS STATUS OF EXHIBITS AND EXHIBIT LIST FOR SAME(.5); RETRIEVE AND SAVE TO DATABASE EXHIBITS FOR SAME (.9); PREPARE MOTION TO COMPEL/MOTION IN LIMINE FOR FILING IN BOTH PUBLIC VERSION AND SEALED VERSION (.6); PREPARE REPLY TO MOTION TO DISMISS FOR FILING IN BOTH PUBLIC VERSION AND SEALED VERSION (.3); FILE MOTION TO COMPEL/ MOTION IN LIMINE IN PUBLIC VERSION (.4); FILE MOTION TO COMPEL/MOTION IN LIMINE IN SEALED VERSION (.4); FILE REPLY TO MOTION TO DISMISS IN PUBLIC VERSION (.4); FILE REPLY TO MOTION TO DISMISS IN SEALED VERSION (.4);	4.60	2,300.00
02/27/24	MOXLEY	PREPARE FOR YESCARE RULE 30(B)(6) DEPOSITION (.5); DEPOSE YESCARE'S CORPORATE REPRESENTATIVE (2.0); ATTENTION TO FINALIZING MOTION IN LIMINE/MOTION TO COMPEL (.7); PREPARE J. SPROUSE (YESCARE) DEPOSITION DESIGNATIONS FOR HEARING (2.5); PREPARE FOR HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (1.4)	7.10	8,875.00
02/27/24	CICERO	PREPARE FOR TRIAL	2.50	3,750.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 37

Date	Professional	Description	Hours	Value
02/27/24	GOODMAN	REVIEW AND EDIT REPLY IN SUPPORT OF MOTION TO DISMISS	0.30	480.00
02/28/24	MCCAFFERTY	REVISE DRAFT OF EXHIBIT LIST AND WITNESS LIST (3.2); PREPARE EXHIBITS FOR HEARING (5.4); STAMP EXHIBITS FOR HEARING (1.1); PRINT EXHIBITS FOR HEARING (2.4); REVIEW DEBTOR AND UCC EXHIBITS AND DRAFT POTENTIAL OBJECTIONS TO PREPARE FOR MEET AND CONFER (1.2)	13.30	12,635.00
02/28/24	QUIJANO	NUMBERING FINAL EXHIBIT DOCUMENTS	1.50	577.50
02/28/24	HESTER	NUMBER DOCUMENTS IN ACCORDANCE WITH EXHIBIT LIST	4.00	1,540.00
02/28/24	HESTER	QC EXHIBIT LIST	0.30	115.50
02/28/24	HESTER	QC EXHIBIT LIST AS FILED	0.30	115.50
02/28/24	SIEGER-GRIMM	REVIEW SDNY AND BANKRUPTCY DOCKETS RE: MOTION TO QUASH STATUS (.2); FOLLOW UP RE: SAME (.2); REVIEW EMAILS RE: MEET AND CONFER OFFERS/RESPONSES (.6); EXHIBIT REVIEW AND PREPARATION FOR TRIAL (2.7); TRIAL PREP / NEXT STEPS TEAM MEETING (1.1)	4.80	5,760.00
02/28/24	CICERO	ATTEND YESCARE 30(B)(6) DEPOSITION (3.5); WORK ON EXHIBIT LIST AND EXHIBIT PREP FOR TRIAL (4.5)	8.00	12,000.00
02/28/24	CICERO	MEETING RE: TRIAL PREPARATION	2.20	3,300.00
02/28/24	MOXLEY	CALLS WITH D. MOLTON, E. GOODMAN, AND J. MEYERS RE HEARING EXHIBITS AND CASE STRATEGY (.8); PREPARING FOR D. BARTON CROSS-EXAMINATION AT HEARING (2.0); MEETING AND CALLS WITH G. CICERO, J. MEYERS, S. SIEGER-GRIMM, AND M. MCCAFFERTY RE TRIAL PLANNING AND STRATEGY AND PREPARE FOR TRIAL (4.4)	7.20	9,000.00
02/28/24	MEYERS	PROOF AND FINALIZE WITNESS AND EXHIBIT LIST AND COORDINATE FILING AND EXCHANGE OF SAME; TROUBLESHOOT EXCHANGE OF ELECTRONIC COPIES OF EXHIBITS; ATTEND TEAM MEETING TO DISCUSS TRIAL LOGISTICS, STRATEGY AND ACTION ITEMS; COORDINATE PREPARATION OF EXHIBIT BINDERS AND WITNESS BINDERS	5.50	5,830.00
02/28/24	VEILLEUX	EXPORT DATA SET FROM DATABASE PER CASE TEAM SPECIFICATIONS	0.60	309.00
02/28/24	ALICEA	DISCUSS TRIAL NEEDS WITH C. MOXLEY; EXAMINE MOTION TO DISMISS IN PREPARATION OF TRIAL ASSISTANCE	1.70	1,317.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 38

Date	Professional	Description	Hours	Value
02/28/24	ALICEA	EXAMINE EXHIBIT LIST AND EACH OF THE EXHIBITS NECESSARY FOR TRIAL; DETERMINE AND ANALYZE ANY DISCREPANCIES OR ISSUES WITH THE EXHIBITS TO BE SENT TO OPPOSING COUNSEL	3.30	2,557.50
02/28/24	SIEGER-GRIMM	COORDINATE AND FOLLOW UP ON ELECTRONIC EXHIBIT MARKING AND PRINTING FOR TRIAL	0.70	840.00
02/28/24	BURNS	ARRANGE FOR PRINTER TO PRINT LIST OF EXHIBITS FOR MARCH1 HEARING (.6); ARRANGE FOR PRINTER TO PRINT WITNESS BINDER FOR MARCH 1, 2024 WITNESS EXAMINATION (.3); CONTACT COURT DOCUMENT SPECIALIST TO ARRANGE FOR EXHIBIT STAMPING FOR MARCH 1 HEARING (.4); RETRIEVE DOCUMENTS AND ADD TO AND ORGANIZE IN DATABASE FOR WITNESS LIST EXCHANGE FOR MARCH 1 HEARING (2.1); FILE WITNESS LIST (.6); DOWNLOAD AND ADD DEBTOR'S WITNESS LIST TO DATABASE AND CIRCULATE SAME (.5)	4.50	2,250.00
02/29/24	MCCAFFERTY	PREPARE EXHIBITS FOR HEARING (4.6), SHARE REVISED EXHIBITS WITH OPPOSING COUNSEL (.9), PREPARE PRINTED EXHIBITS IN BINDERS FOR HEARING (3.3); DRAFT REPLY IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE (4.1); FINALIZE AND FILE AND SERVE REPLY IN SUPPORT OF MOTION TO COMPEL AND MOTION IN LIMINE (1.1); PREPARE EXHIBITS AND QUESTIONS FOR CROSS EXAMINATION OF D. BARTON (2.2)	16.20	15,390.00
02/29/24	VEILLEUX	ORGANIZE AND PREPARE ELECTRONIC DATA FOR DELIVERY	0.10	51.50
02/29/24	GOODMAN	CONFERENCE WITH MR. MOXLEY REGARDING BARTON TESTIMONY AND QUESTIONS (2.0); EDIT AND REVISE OPEN ARGUMENT PRESENTATION (2.0); REVIEW OBJECTION TO MOTION IN LIMINE (.5); DRAFT AND EDIT REPLY IN SUPPORT OF MOTION IN LIMINE (1.5); PLAN AND PREPARE FOR HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (3.0)	9.00	14,400.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 39

Date	Professional	Description	Hours	Value
02/29/24	SIEGER-GRIMM	REVIEW TCC EXHIBITS FOR ISSUES AND REVISE AS NEEDED (2.3); ANALYSIS AND DISCUSSION OF EXHIBIT ISSUES WITH M. MCCAFFERTY (.7); FOLLOW UP WITH G. CICERO RE: SAME (.2); FURTHER EXHIBIT REVIEW AND PREPARATION FOR TRIAL (1.5); MULTIPLE CALLS AND FOLLOW UP WITH CLERKS OF SDNY AND SD TEXAS COURTS RE: STATUS OF TRANSFERRED MOTION TO QUASH (.9); INTERNAL UPDATE RE: SAME (.2); FOLLOW UP WITH DEBTOR'S COUNSEL RE: ACCESS TO TCC EXHIBIT (.2); MEET AND CONFER RE: EXHIBITS (.4); ANALYSIS OF POSSIBLE OBJECTIONS TO TRIAL EXHIBITS AND RESPONSES (1.9); COORDINATE RE-NUMBERING OF EXHIBITS (.3); REVIEW UPDATED EXHIBITS RE: REMAINING ISSUES (1.1); SUMMARIZE CHANGES TO DOCUMENTS PER LOCAL RULES (.9); COORDINATE PRINTING ISSUES AND BINDER UPDATE FOR TRIAL (.5); FOLLOW UP RE: OUTSTANDING ISSUES FOR FIRST DAY (.6)	11.70	14,040.00
02/29/24	MEYERS	REVIEW DEBTOR/UCC EXHIBIT LIST TO ASSESS POSITION ON ADMISSIBILITY AND POTENTIAL OBJECTIONS; ATTEND MEET AND CONFER WITH DEBTOR AND UCC COUNSEL REGARDING EXHIBITS; CORRESPOND WITH DEBTOR'S COUNSEL CONCERNING ADMISSIBILITY OF EXHIBITS	3.00	3,180.00
02/29/24	CICERO	PREPARE FOR TRIAL	12.00	18,000.00
02/29/24	BURNS	FILE REPLY TO TCC'S MOTION TO COMPEL/MOTION IN LIMINE IN A SEALED VERSION AND A PUBLIC VERSION (.8); CONFER WITH B. VEILLEUX REGARDING OUR DATABASES CONTAINING EXHIBITS FOR MARCH 1 HEARING (.3); ATTENTION TO DATABASE CONTAINING EXHIBIT LISTS FOR MARCH 1 HEARING (1.5)	2.60	1,300.00
02/29/24	MOXLEY	PREPARE FOR D. BARTON CROSS-EXAMINATION (12.0); PREPARE FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION (4.2)	16.20	20,250.00
Total Hours and Fees			995.10	1,152,647.50

TIME SUMMARY

Professional	Hours	Rate	Value
HELEN VLACHOS	0.30 hours at	445.00	133.50
DAVID J. MOLTON	3.00 hours at	2,250.00	6,750.00
GERARD T. CICERO	148.20 hours at	1,500.00	222,300.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 40

Professional	Hours		Rate	Value
JESSICA N. MEYERS	55.20	hours at	1,060.00	58,512.00
D. C. MOXLEY	188.90	hours at	1,250.00	236,125.00
MEGHAN MCCAFFERTY	169.90	hours at	950.00	161,405.00
KELCEY C. WELLS	7.60	hours at	480.00	3,648.00
SUSAN SIEGER-GRIMM	113.10	hours at	1,200.00	135,720.00
ERIC R. GOODMAN	142.80	hours at	1,600.00	228,480.00
BRITTANY E. VEILLEUX	6.60	hours at	515.00	3,399.00
ELIZABETH C. CASTANO	20.40	hours at	645.00	13,158.00
SHARIX A. ALICEA	5.00	hours at	775.00	3,875.00
ANDRES QUIJANO	9.50	hours at	385.00	3,657.50
EMILY A. HESTER	14.90	hours at	385.00	5,736.50
THOMAS BURNS	33.30	hours at	500.00	16,650.00
ETHAN H. CALHOUN	76.40	hours at	695.00	53,098.00
Total Fees				1,152,647.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: NON-WORKING TRAVEL @ 50%

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0011	NON-WORKING TRAVEL @ 50%	42,862.50	0.00	42,862.50
	Total	42,862.50	0.00	42,862.50

Total Current Fees	\$42,862.50
Total Current Costs	\$0.00
Total Invoice	\$42,862.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 42

RE: NON-WORKING TRAVEL @ 50%

TIME DETAIL

Date	Professional	Description	Hours	Value
02/07/24	MEYERS	TRAVEL TO DALLAS FOR LEFKOWITZ DEPOSITION.	8.00	4,240.00
02/07/24	MOXLEY	TRAVEL TO DALLAS, TX FOR I. LEFKOWITZ DEPOSITION	4.40	2,750.00
02/09/24	MEYERS	RETURN TRAVEL FROM DALLAS / DEPOSITION OF ISAAC LEFKOWITZ.	7.00	3,710.00
02/09/24	CICERO	[MOVE TO TRAVEL] RETURN TRAVEL FROM DALLAS	7.00	5,250.00
02/09/24	MOXLEY	TRAVEL FROM HOUSTON FOR I. LEFKOWITZ DEPOSITION AND M2 LOANCO LLC DEPOSITION	5.30	3,312.50
02/15/24	MOXLEY	TRAVEL TO DALLAS, TX FOR DEPOSITION OF DEBTOR'S RULE 30(B)(6) DESIGNEE	7.90	4,937.50
02/17/24	MOXLEY	TRAVEL FROM DALLAS, TX FOR DEBTOR RULE 30(B)(6) DEPOSITION (CRO R. PERRY)	6.50	4,062.50
02/25/24	MOXLEY	TRAVEL TO WASHINGTON, D.C. FOR M. ATKINSON DEPOSITION	3.00	1,875.00
02/26/24	MOXLEY	TRAVEL TO NASHVILLE, TN FOR YESCARE RULE 30(B)(6) DEPOSITION	3.20	2,000.00
02/28/24	MOXLEY	TRAVEL FROM NASHVILLE, TN TO HOUSTON, TX FOR EVIDENTIARY HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS	4.40	2,750.00
02/28/24	MCCAFFERTY	TRAVEL TO HEARING	1.00	475.00
02/29/24	GOODMAN	TRAVEL TO HOUSTON, TEXAS FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION (NON-WORKING TRAVEL) (5.4).	5.40	4,320.00
02/29/24	MEYERS	TRAVEL TO HOUSTON FOR HEARING ON MOTIONS TO DISMISS AND FOR 9019 SETTLEMENT.	6.00	3,180.00
Total Hours and Fees			69.10	42,862.50

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	7.00 hours at	750.00	5,250.00
JESSICA N. MEYERS	21.00 hours at	530.00	11,130.00
D. C. MOXLEY	34.70 hours at	625.00	21,687.50
MEGHAN MCCAFFERTY	1.00 hours at	475.00	475.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 43

Professional	Hours	Rate	Value
ERIC R. GOODMAN	5.40 hours at	800.00	4,320.00
Total Fees			42,862.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: PLAN AND DISCLOSURE STATEMENT

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0014	PLAN AND DISCLOSURE STATEMENT	800.00	0.00	800.00
	Total	800.00	0.00	800.00

Total Current Fees	\$800.00
Total Current Costs	\$0.00
Total Invoice	\$800.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 March 8, 2024

Invoice 6974376
 Page 45

RE: PLAN AND DISCLOSURE STATEMENT

TIME DETAIL

Date	Professional	Description	Hours	Value
02/14/24	GOODMAN	FURTHER REVIEW OF DISCLOSURE STATEMENT	0.50	800.00
Total Hours and Fees			0.50	800.00

TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	0.50 hours at	1,600.00	800.00
Total Fees			800.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: MEDIATION/SETTLEMENT

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0015	MEDIATION/SETTLEMENT	1,920.00	0.00	1,920.00
	Total	1,920.00	0.00	1,920.00

Total Current Fees	\$1,920.00
Total Current Costs	\$0.00
Total Invoice	\$1,920.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 March 8, 2024

Invoice 6974376
 Page 47

RE: MEDIATION/SETTLEMENT

TIME DETAIL

Date	Professional	Description	Hours	Value
02/27/24	GOODMAN	CONFERENCE CALL WITH STATE COURT COUNSEL REGARDING SETTLEMENT ISSUES (1.0); TELEPHONE CALL WITH MEDIATOR REGARDING SETTLEMENT ISSUES (.2)	1.20	1,920.00
Total Hours and Fees			1.20	1,920.00

TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	1.20 hours at	1,600.00	1,920.00
Total Fees			1,920.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: COURT ATTENDANCE

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0016	COURT ATTENDANCE	3,135.00	0.00	3,135.00
	Total	3,135.00	0.00	3,135.00

Total Current Fees	\$3,135.00
Total Current Costs	\$0.00
Total Invoice	\$3,135.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 49

RE: COURT ATTENDANCE

TIME DETAIL

Date	Professional	Description	Hours	Value
02/01/24	MOLTON	ATTEND COURT STATUS CONFERENCE RE SCHEDULING OF DEBTOR'S 9019 MOTION AND DISCOVERY ISSUES PERTAINING THERETO	0.80	1,800.00
02/02/24	CALHOUN	ATTENDING EMERGENCY STATUS CONFERENCE.	0.50	347.50
02/02/24	GOODMAN	ATTEND STATUS CONFERENCE ON EMERGENCY MOTION	0.40	640.00
02/05/24	CALHOUN	ATTENDING COURT HEARING/STATUS CONFERENCE 2/5.	0.50	347.50
Total Hours and Fees			2.20	3,135.00

TIME SUMMARY

Professional	Hours	Rate	Value
DAVID J. MOLTON	0.80 hours at	2,250.00	1,800.00
ERIC R. GOODMAN	0.40 hours at	1,600.00	640.00
ETHAN H. CALHOUN	1.00 hours at	695.00	695.00
Total Fees			3,135.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: DISMISSAL/TRUSTEE/EXAMINER MATTERS

INVOICE

For professional services rendered in connection with the above captioned matter through February 29, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0017	DISMISSAL/TRUSTEE/EXAMINER MATTERS	0.00	358.00	358.00
	Total	0.00	358.00	358.00

Total Current Fees	\$0.00
Total Current Costs	\$358.00
Total Invoice	\$358.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
March 8, 2024

Invoice 6974376
Page 51

RE: DISMISSAL/TRUSTEE/EXAMINER MATTERS

COST SUMMARY

Description	Value
EXPERT FEES	358.00
Total Costs	358.00

INCLUDES ONLY TIME AND COSTS TO DATE
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

brownrudnick

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6974376
Date Mar 8, 2024
Client 040178

RE: TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Remittance 



Balance Due: \$1,004,935.58

To ensure proper credit to your account, please include this page with your payment.

Remittance Address

Brown Rudnick LLP
P.O. Box 23079
New York, NY 10087-3079

Wire Instructions

JP Morgan Chase
270 Park Avenue
New York, NY 10017
ABA Number: 021000021
SWIFT Code: CHASUS33

For Credit To

Brown Rudnick LLP Deposit Account
Account Number: 760367067

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

In re: TEHUM CARE SERVICES, INC., ¹ Debtor.	Chapter 11 Case No. 23-90086 (CML)
--	---

**FOURTH MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP FOR
 COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
 EXPENSES AS CO-COUNSEL TO THE OFFICIAL COMMITTEE
 OF TORT CLAIMANTS FOR THE PERIOD FROM
MARCH 1, 2024 THROUGH MARCH 31, 2024**

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [ECF No. 357], each Application Recipient receiving notice of this monthly fee statement shall have until 4:00 p.m. (CT), 14 days after service of this monthly fee statement to object to the fees and expenses requested herein. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay 80% of the fees and 100% of the expenses requested in this monthly fee statement that are not subject to an objection.

Name of Professional:	Brown Rudnick LLP
Authorized to Provide Professional Services to:	Official Committee of Tort Claimants
Date Order of Employment Signed:	January 24, 2024, as of November 22, 2023 [ECF No. 1294]
Time Period Covered:	March 1, 2024 – March 31, 2024
Total Fees Sought:	\$813,533.00
Amount of retainer received in case:	N/A
Total professional fees covered by this statement:	\$805,943.50
Total professional hours covered by this statement:	679.80
Average hourly rate for professionals:	\$1,185.56

¹ The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.



Total paraprofessional fees covered by this statement:	\$7,589.50
Total paraprofessional hours covered by this statement:	15.20
Average hourly rate for paraprofessionals:	\$499.31
Reimbursable expenses sought in this statement:	\$50,776.66
Payment requested:	
80% Fees	\$650,826.40
100% Expenses	\$50,776.66
Total:	\$701,603.06

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the “Interim Compensation Order”), and the Order Authorizing the Employment and Retention of Brown Rudnick LLP as Co-Counsel for the Official Committee of Tort Claimants as of November 22, 2023 [ECF No. 1294], the law firm of Brown Rudnick LLP (“Brown Rudnick”), as co-counsel to the Official Committee of Tort Claimants (the “Committee”) appointed in this chapter 11 case, hereby submits this Fourth Monthly Fee Statement of Brown Rudnick LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from March 1, 2024 to March 31, 2024 (the “Fourth Monthly Fee Statement”). By the Fourth Monthly Fee Statement and pursuant to the Interim Compensation Order, Brown Rudnick seeks interim payment of (i) \$650,826.40 (80% of \$813,533.00) as compensation for professional services rendered to the Committee and (ii) \$50,776.66 for reimbursement of actual and necessary expenses, for a total of \$701,603.06 for

the period March 1, 2024 through and including March 31, 2024 (the “Fee Period”). Pursuant to the Interim Compensation Order, the Application Recipients have until 4:00 p.m. (CT) on the fourteenth day following service of this Fourth Monthly Fee Statement to object to the requested fees and expenses.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Fourth Monthly Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Brown Rudnick partners, counsel, associates, consultants and paraprofessionals during the Fee Period with respect to each of the subject matter categories Brown Rudnick established in accordance with its internal billing procedures. As reflected in Exhibit A, Brown Rudnick incurred \$813,533.00 in fees during the Fee Period. Pursuant to this Fourth Monthly Fee Statement, Brown Rudnick seeks compensation in the amount of \$650,826.40 or 80% of such fees

Exhibit B is a schedule providing certain information regarding the Brown Rudnick attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Fourth Monthly Fee Statement. Attorneys and paraprofessionals of Brown Rudnick expended a total of 695.00 hours in connection with this chapter 11 case during the Fee Period.

Exhibit C is a schedule setting forth the amount sought with respect to each category of expenses for which reimbursement is sought in this Fourth Monthly Fee Statement. This Fourth Monthly Fee Statement seeks reimbursement of expenses in the aggregate total amount of \$50,776.66.

Exhibit D consists of Brown Rudnick’s detailed records of fees and expenses incurred during the Fee Period in rendering professional services to the Committee.

Representations

2. Although Brown Rudnick has used its reasonable best efforts to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Fourth Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Brown Rudnick reserves the right to seek payment

of such fees and expenses not included herein. Subsequent monthly fee statements will be submitted in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules and the Interim Compensation Order.

WHEREFORE, Brown Rudnick respectfully requests compensation and reimbursement of its expenses incurred during the Fee Period in the total amount of \$701,603.06, consisting of (i) \$650,826.40, which is 80% of the fees incurred by the Debtors for reasonable and necessary professional services rendered by Brown Rudnick, and (ii) \$50,776.66, which is 100% of actual necessary costs and expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

Dated: April 23, 2024
New York, NY

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Eric R. Goodman

David J. Molton (*pro hac vice*)

Eric R. Goodman (*pro hac vice*)

Gerard T. Cicero (*pro hac vice*)

Seven Times Square

New York, NY 10036

Telephone: (212) 209-4800

Facsimile: (212) 209-4801

Email: dmolton@brownrudnick.com

egoodman@brownrudnick.com

gcicero@brownrudnick.com

CERTIFICATE OF SERVICE

I certify that on April 23, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Eric R. Goodman

Eric R. Goodman

EXHIBIT A

Summary of Hours Expended and Fees Incurred by Matter Category

FEE APPLICATION DATA

4/9/2024

CLIENT: 040178

1

Bill Date range: 4/9/2024 to 4/9/2024

MATTER NAME	EMPLOYEE NAME	BILLED HRS	BILLED AMT
CASE ADMINISTRATION/DISBURSEMENTS	SIEGER-GRIMM, SUSAN	0.10	\$120.00
	BURNS, THOMAS	2.20	\$1,100.00
		2.30	\$1,220.00
MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE	MOXLEY, D. CAMERON	1.60	\$2,000.00
	GOODMAN, ERIC R.	2.80	\$4,480.00
		4.40	\$6,480.00
MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	GOODMAN, ERIC R.	0.80	\$1,280.00
		0.80	\$1,280.00
FEE/EMPLOYMENT APPLICATIONS	BURNS, THOMAS	6.30	\$3,150.00
		6.30	\$3,150.00
CONTESTED MATTERS/LITIGATION (GENERAL)	CICERO, GERARD T.	37.80	\$56,700.00
	MEYERS, JESSICA N.	28.70	\$30,422.00
	MOXLEY, D. CAMERON	130.20	\$162,750.00
	MCCAFFERTY, MEGHAN	69.30	\$65,835.00
	WELLS, KELCEY C.	0.60	\$288.00
	SIEGER-GRIMM, SUSAN	7.00	\$8,400.00
	GOODMAN, ERIC R.	90.10	\$144,160.00
	VEILLEUX, BRITTANY E.	0.10	\$51.50
	CASTANO, ELIZABETH, C.	7.20	\$4,644.00
	RIZKALLA, ANDREW	0.40	\$310.00
	ALICEA, SHARIX A.	3.60	\$2,790.00
	BURNS, THOMAS	6.00	\$3,000.00
		381.00	\$479,350.50
	CICERO, GERARD T.	21.00	\$15,750.00
	MEYERS, JESSICA N.	18.50	\$9,805.00

FEE APPLICATION DATA

4/9/2024

CLIENT: 040178

1

Bill Date range: 4/9/2024 to 4/9/2024

NON-WORKING TRAVEL @ 50%	MOXLEY, D. CAMERON	23.60	\$14,750.00
	MCCAFFERTY, MEGHAN	17.00	\$8,075.00
	GOODMAN, ERIC R.	13.80	\$11,040.00
		93.90	\$59,420.00
CLAIMS ADMINISTRATION AND OBJECTIONS	CASTANO, ELIZABETH, C.	5.50	\$3,547.50
		5.50	\$3,547.50
COURT ATTENDANCE	CICERO, GERARD T.	45.20	\$67,800.00
	MEYERS, JESSICA N.	30.00	\$31,800.00
	MOXLEY, D. CAMERON	41.80	\$52,250.00
	MCCAFFERTY, MEGHAN	41.30	\$39,235.00
	GOODMAN, ERIC R.	42.50	\$68,000.00
		200.80	\$259,085.00
		695.00	\$813,533.00

EXHIBIT B

Summary of Hours Expended and Fees Incurred by Professional

SUMMARY OF TIME & COMPENSATION

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
Eric R. Goodman	Partner; Admitted to Ohio Bar in 2003; Admitted to New York Bar in 2018; Admitted to Illinois Bar in 2020; Admitted to District Court of Columbia Bar in 2021; Admitted to Massachusetts Bar in 2021; Dispute Resolution & Restructuring	\$1,600	150.00	\$228,960.00
Gerard T. Cicero	Partner; Admitted to New Jersey Bar in 2015; Admitted to New York Bar in 2016; Dispute Resolution & Restructuring	\$1,500	104.00	\$140,250.00
D. Cameron Moxley	Partner; Admitted to New York Bar in 2005; Admitted to Connecticut Bar in 2022; Dispute Resolution & Restructuring	\$1,250	197.20	\$231,750.00
Susan Sieger-Grimm	Counsel; Admitted to Virginia Bar in 1994; Admitted to New York Bar 1997; Dispute Resolution & Restructuring	\$1,200	7.10	\$8,520.00
Jessica N. Meyers	Partner; Admitted in Massachusetts Bar in 2015; Admitted to New York Bar in 2017; Dispute Resolution & Restructuring	\$1,060	77.20	\$72,027.00
Meghan McCafferty	Associate; Admitted to Massachusetts Bar in 2019; Dispute Resolution & Restructuring	\$950	127.60	\$113,145.00

COMPENSATION BY PROFESSIONAL				
Name of Professional Person	Position; Admission Date; Specialty	Hourly Billing Rate	Total Hours	Total Compensation
Sharix A. Alicea	Associate; Admitted to Connecticut Bar in 2020; Admitted to New York Bar in 2020; Admitted to District Court of Columbia Bar in 2023; Corporate & Capital Markets	\$775	3.60	\$2,790.00
Andrew Rizkalla	Associate; Admitted to Illinois Bar in 2021; Admitted to Tennessee Bar in 2021	\$775	.40	310.00
Elizabeth C. Castano	Associate; Admitted to New York Bar in 2024; Dispute Resolution & Restructuring	\$645	12.70	\$8,191.50
TOTAL			679.80	\$805,943.50
PROFESSIONAL BLENDED RATE		\$1,185.56		

COMPENSATION BY PARAPROFESSIONAL				
Name of Professional Person	Position	Hourly Billing Rate	Total Hours	Total Compensation
Brittany E. Veilleux	Litigation Technology Specialist	\$515	.10	\$51.50
Thomas Burns	Paralegal	\$500	14.50	\$7,250.00
Kelcey C. Wells	Paralegal	\$480	.60	\$288.00
TOTAL			15.20	\$7,589.50
PARAPROFESSIONAL BLENDED RATE		\$499.31		

EXHIBIT C

Record of Expenses

BILLED DISBURSEMENTS

Client: TEHUM CARE SERVICES, INC., OFFICIAL TORT (040178)

Amounts shown in USD

BILL DATE	COST DESC	BILLED AMT
4/9/2024	Copies	83.20
	Document Production	0.00
	eDiscovery Hosting	2,473.90
	Filing Fee	300.00
	Hotel	1,158.10
	Meals	969.02
	Outside Copies	7,805.72
	Pacer	79.40
	Parking and Tolls	105.00
	Taxi	1,713.29
	Transcripts	34,235.03
	Westlaw Online Transactional Searches / Docs	1,854.00
		50,776.66
		50,776.66

EXHIBIT D

Detailed Record of Time Entries



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6976463
Date Apr 9, 2024
Client 040178

RE: TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

INVOICE

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	1,220.00	50,776.66	51,996.66
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	6,480.00	0.00	6,480.00
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	1,280.00	0.00	1,280.00
040178.0008	FEE/EMPLOYMENT APPLICATIONS	3,150.00	0.00	3,150.00
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	479,350.50	0.00	479,350.50
040178.0011	NON-WORKING TRAVEL @ 50%	59,420.00	0.00	59,420.00
040178.0013	CLAIMS ADMINISTRATION AND OBJECTIONS	3,547.50	0.00	3,547.50
040178.0016	COURT ATTENDANCE	259,085.00	0.00	259,085.00
Total		813,533.00	50,776.66	864,309.66

Total Current Fees	\$813,533.00
20% Holdback Amount	(162,706.60)
80% CURRENT BALANCE DUE	\$650,826.40
Total Current Costs	\$50,776.66
Total Invoice	\$701,603.06



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE

Invoice 6976463
Date Apr 9, 2024
Client 040178

RE: CASE ADMINISTRATION/DISBURSEMENTS

INVOICE

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0001	CASE ADMINISTRATION/DISBURSEMENTS	1,220.00	50,776.66	51,996.66
	Total	1,220.00	50,776.66	51,996.66

Total Current Fees	\$1,220.00
Total Current Costs	\$50,776.66
Total Invoice	\$51,996.66

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024Invoice 6976463
Page 3

RE: CASE ADMINISTRATION/DISBURSEMENTS

TIME DETAIL

Date	Professional	Description	Hours	Value
03/05/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2)	0.30	150.00
03/07/24	BURNS	ORDER TRANSCRIPT FROM 3/5 HEARING	0.20	100.00
03/14/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.2)	0.30	150.00
03/25/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	100.00
03/26/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1); ANALYSIS OF PERTINENT DATES AND DEADLINES (.2)	0.40	200.00
03/27/24	SIEGER-GRIMM	FOLLOW UP WITH T. BURNS RE: CALENDAR ISSUES	0.10	120.00
03/27/24	BURNS	ANALYSIS OF PERTINENT DATES AND DEADLINES (.4); REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1);	0.60	300.00
03/29/24	BURNS	REVIEW AND ANALYZE DOCKET (.1), CIRCULATE RECENT PERTINENT ENTRIES (.1)	0.20	100.00
Total Hours and Fees			2.30	1,220.00

TIME SUMMARY

Professional	Hours	Rate	Value
SUSAN SIEGER-GRIMM	0.10 hours at	1,200.00	120.00
THOMAS BURNS	2.20 hours at	500.00	1,100.00
Total Fees			1,220.00

COST SUMMARY

Description	Value
FILING FEE	300.00
PARKING AND TOLLS	105.00
MEALS	969.02
OUTSIDE COPIES	7,805.72
TRANSCRIPTS	34,235.03



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 4

Description	Value
TAXI	1,713.29
HOTEL	1,158.10
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	1,854.00
PACER	79.40
EDISCOVERY HOSTING	2,473.90
COPIES	83.20
Total Costs	50,776.66



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6976463
Date Apr 9, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH
COMMITTEE/CREDITORS

INVOICE

For professional services rendered in connection with the above captioned matter
through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0005	MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS	6,480.00	0.00	6,480.00
	Total	6,480.00	0.00	6,480.00

Total Current Fees \$6,480.00

Total Current Costs \$0.00

Total Invoice \$6,480.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 April 9, 2024

Invoice 6976463
 Page 6

RE: MEETINGS OF AND COMMUNICATIONS WITH COMMITTEE/CREDITORS

TIME DETAIL

Date	Professional	Description	Hours	Value
03/04/24	GOODMAN	ATTEND COMMITTEE CALL REGARDING CASE STATUS	1.10	1,760.00
03/04/24	MOXLEY	PARTICIPATE IN TCC MEETING	0.50	625.00
03/12/24	GOODMAN	CONFERENCE CALL WITH THE TCC REGARDING CASE STATUS (ATTEND IN PART)	0.60	960.00
03/19/24	GOODMAN	CONFERENCE CALL WITH THE COMMITTEE REGARDING CASE STATUS AND HEARING PREPARATION	1.10	1,760.00
03/19/24	MOXLEY	ATTEND AND PARTICIPATE IN WEEKLY COMMITTEE MEETING REGARDING CASE STATUS AND STRATEGY	1.10	1,375.00
Total Hours and Fees			4.40	6,480.00

TIME SUMMARY

Professional	Hours	Rate	Value
D. C. MOXLEY	1.60 hours at	1,250.00	2,000.00
ERIC R. GOODMAN	2.80 hours at	1,600.00	4,480.00
Total Fees			6,480.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6976463
Date Apr 9, 2024
Client 040178

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

INVOICE

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0006	MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL	1,280.00	0.00	1,280.00
	Total	1,280.00	0.00	1,280.00

Total Current Fees	\$1,280.00
Total Current Costs	\$0.00
Total Invoice	\$1,280.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 April 9, 2024

Invoice 6976463
 Page 8

RE: MEETINGS OF AND COMMUNICATIONS WITH CO-COUNSEL

TIME DETAIL

Date	Professional	Description	Hours	Value
03/04/24	GOODMAN	MEET AND CONFER WITH THE DEBTOR'S COUNSEL AND THE UCC'S COUNSEL REGARDING HEARING SCHEDULE	0.50	800.00
03/22/24	GOODMAN	TELEPHONE CALL WITH MR. ZIMMERMAN REGARDING CASE STATUS	0.30	480.00
Total Hours and Fees			0.80	1,280.00

TIME SUMMARY

Professional	Hours	Rate	Value
ERIC R. GOODMAN	0.80 hours at	1,600.00	1,280.00
Total Fees			1,280.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6976463
Date Apr 9, 2024
Client 040178

RE: FEE/EMPLOYMENT APPLICATIONS

INVOICE

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0008	FEE/EMPLOYMENT APPLICATIONS	3,150.00	0.00	3,150.00
Total		3,150.00	0.00	3,150.00

Total Current Fees	\$3,150.00
Total Current Costs	\$0.00
Total Invoice	\$3,150.00

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024Invoice 6976463
Page 10

RE: FEE/EMPLOYMENT APPLICATIONS

TIME DETAIL

Date	Professional	Description	Hours	Value
03/06/24	BURNS	WORK ON THIRD MONTHLY FEE APPLICATION	1.20	600.00
03/07/24	BURNS	WORK ON THIRD MONTHLY FEE APPLICATION	0.70	350.00
03/08/24	BURNS	WORK ON THIRD FEE APPLICATION	2.40	1,200.00
03/11/24	BURNS	FURTHER WORK ON THIRD FEE APPLICATION	1.10	550.00
03/29/24	BURNS	WORK ON FOURTH FEE APPLICATION	0.90	450.00
Total Hours and Fees			6.30	3,150.00

TIME SUMMARY

Professional	Hours	Rate	Value
THOMAS BURNS	6.30 hours at	500.00	3,150.00
Total Fees			3,150.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6976463
Date Apr 9, 2024
Client 040178

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

INVOICE

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0010	CONTESTED MATTERS/LITIGATION (GENERAL)	479,350.50	0.00	479,350.50
	Total	479,350.50	0.00	479,350.50

Total Current Fees	\$479,350.50
Total Current Costs	\$0.00
Total Invoice	\$479,350.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 12

RE: CONTESTED MATTERS/LITIGATION (GENERAL)

TIME DETAIL

Date	Professional	Description	Hours	Value
02/02/24	MCCAFFERTY	STRATEGIZE WITH TEAM RE 9109 OBJECTION AND DEPOSITIONS (.9); STRATEGIZE REGARDING MOTION TO QUASH AND MOTION FOR SANCTION (.5); RESEARCH AND ANALYZE CASE LAW IN SUPPORT OF MOTION TO QUASH (1.5)	2.90	2,755.00
03/01/24	SIEGER-GRIMM	REVIEW SDNY DOCKET AND FOLLOW UP RE: STATUS OF MOTION TO QUASH (.3); ONGOING HEARING ANALYSIS AND COMMUNICATION WITH TRIAL TEAM RE: SAME (4.9)	5.20	6,240.00
03/01/24	MOXLEY	PREPARE FOR D. BARTON CROSS-EXAMINATION, MOTION IN LIMINE ARGUMENT, AND TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS	16.20	20,250.00
03/01/24	BURNS	DRAFT TRANSCRIPT ORDER FORM FROM MARCH 1, 2024 HEARING (.5); FILE SAME (.3)	0.80	400.00
03/01/24	ALICEA	EXAMINE AND REVISE EXHIBIT LIST; EXAMINE DOCUMENTS TO BE FILED ON THE PUBLIC RECORDS; EXAMINE DOCUMENTS TO BE FILED UNDER SEAL.	3.60	2,790.00
03/01/24	MCCAFFERTY	PREPARE EXHIBITS FOR SUBMISSION POST-TRIAL	0.30	285.00
03/01/24	CICERO	MEET WITH TEAM RE: CONTINUED TRIAL STRATEGY	3.00	4,500.00
03/02/24	GOODMAN	REVIEW AND ANALYZE ATKINSON DEPOSITION TRANSCRIPT (5.4); DRAFT AND EDIT OUTLINE FOR ATKINSON QUESTIONS FOR HEARING (7.1).	12.50	20,000.00
03/02/24	MCCAFFERTY	PREPARE EXHIBITS FOR FILING IN PREPARATION FOR TRIAL (4.3); PREPARE QUESTIONS FOR CROSS EXAMINATION OF D. BARTON (1.5); RESEARCH IN SUPPORT OF WITNESS EXAMINATION OF D. BARTON (1.8); RESEARCH AND PREPARE QUESTIONS FOR WITNESS EXAMINATION FOR TRIAL (2.0)	9.60	9,120.00
03/02/24	CICERO	PREPARATION FOR FORTHCOMING TRIAL DAYS	10.60	15,900.00
03/02/24	MEYERS	DISCUSS STRATEGY FOR BARTON CROSS AND FIND SUPPORTING MATERIALS; DRAFT OUTLINE FOR LEFKOWITZ CROSS EXAMINATION AND DISCUSS STRATEGY FOR SAME.	3.50	3,710.00
03/03/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR ATKINSON DIRECT (5.5); FURTHER REVISE OF EXHIBITS FOR ATKINSON DIRECT (3.3).	8.80	14,080.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 13

Date	Professional	Description	Hours	Value
03/03/24	MCCAFFERTY	PREPARE EXHIBITS AND LINES OF QUESTIONING FOR CROSS OF R. PERRY (2.4); PREPARE EXHIBITS AND LINES OF QUESTIONING FOR M. DUNDON (.6); PREPARE FOR HEARING TESTIMONY OF EXPERT WITNESS M. ATKINSON (.6); RESEARCH IN SUPPORT OF CROSS EXAMINATION QUESTIONING OF R.PERRY AND D.BARTON (1.3)	4.90	4,655.00
03/03/24	SIEGER-GRIMM	UPDATE EMAIL TO J. MILIBAND RE: STATUS OF MOTION TO COMPEL AND FIRST DAY HEARING	0.30	360.00
03/03/24	MEYERS	PREPARE OUTLINE FOR LEFKOWITZ CROSS EXAMINATION AND DISCUSS SAME INTERNALLY.	7.00	7,420.00
03/03/24	MOXLEY	PREPARE FOR CROSS EXAMINATIONS OF M. DUNDON AND R. PERRY AND FOR TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS	12.20	15,250.00
03/03/24	CICERO	PREPARE FOR RESTART OF TRIAL AND PREPARATION OF CROSS EXAMINATION OUTLINES RE: SAME	9.00	13,500.00
03/04/24	GOODMAN	EDIT AND REVISE OUTLINE FOR ATKINSON TESTIMONY (3.5); CONFERENCE WITH MR. ATKINSON TO PREPARE FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION (3.0); REVIEW REVISED DIP ORDER (.2); TELEPHONE CALL WITH MR. BROOKNER REGARDING DIP ORDER (.2)	6.90	11,040.00
03/04/24	GOODMAN	CONFERENCE WITH MR. MOXLEY AND TEAM REGARDING DUNDON AND PERRY OUTLINES.	2.00	3,200.00
03/04/24	MOXLEY	MEET AND CONFER WITH DEBTOR, UCC AND OTHER PARTIES RE WITNESS TIMING AND SCHEDULE ISSUES (0.5); PREPARE FOR CROSS-EXAMINATION OF R. PERRY AND M. DUNDON (13.0)	13.50	16,875.00
03/04/24	CICERO	PREPARE RUSSELL PERRY AND DUNDON CROSS OUTLINES	9.20	13,800.00
03/04/24	MCCAFFERTY	PREPARE EXHIBITS FOR EXAMINATION OF M.ATKINSON (.8); PREPARE EXHIBITS FOR EXAMINATION OF M.DUNDON (1.0); PREPARE EXHIBITS FOR EXAMINATION OF R.PERRY (2.2); PREPARE CROSS EXAMINATION OF R.PERRY (3.5); PREPARE FOR HEARING ON 9019 MOTION (1.6)	9.10	8,645.00
03/04/24	BURNS	CONFER WITH TRANSCRIPTION COMPANY REGARDING THE STATUS OF TRANSCRIPT REQUEST ON 3/1/24 HEARING (.3); CONFER WITH M. MCCAFFERTY REGARDING SAME (.2)	0.50	250.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 14

Date	Professional	Description	Hours	Value
03/04/24	MEYERS	ASSIST IN PREPARATIONS FOR CROSS EXAMINATION OF PERRY AND DUNDON.	2.50	2,650.00
03/05/24	CASTANO	RESEARCH ON 9019 ISSUES FOR J. MEYERS.	0.70	451.50
03/05/24	MOXLEY	PREPARE FOR HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (4.7); CONFER WITH E. GOODMAN AND TEAM POST-HEARING AND PLAN FOR HEARING GOING FORWARD (2.0)	6.70	8,375.00
03/05/24	BURNS	FOLLOW UP PHONE CALL WITH TRANSCRIPTION COMPANY REGARDING STATUS OF TRANSCRIPT	0.20	100.00
03/05/24	SIEGER-GRIMM	ANALYSIS RE: MOTION TO DISMISS HEARING	0.90	1,080.00
03/05/24	VEILLEUX	EXPORT DATA SET FROM DATABASE PER CASE TEAM SPECIFICATIONS	0.10	51.50
03/06/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR CLOSING ARGUMENTS.	1.00	1,600.00
03/06/24	SIEGER-GRIMM	INTERNAL FOLLOW UP RE: HEARING STATUS (.1); SUMMARIZE MOTION TO QUASH STATUS AND ISSUES TO CONSIDER (.4)	0.50	600.00
03/06/24	BURNS	DOWNLOAD TRANSCRIPT OF MARCH 1 HEARING, CIRCULATE TO TEAM AND ADD TO DATABASE (.3); CONFER WITH M. MCCAFFERTY REGARDING STATUS OF TRANSCRIPT OF MARCH 5 HEARING (.2)	0.50	250.00
03/06/24	MOXLEY	CALLS WITH E. GOODMAN REGARDING HEARING STRATEGY ISSUES AND PREPARING FOR CONTINUED HEARING	0.70	875.00
03/07/24	GOODMAN	DRAFT AND EDIT REVISED HEARING QUESTIONS FOR TCC WITNESS (2.0); TELEPHONE CALL WITH MR. MOXLEY REGARDING UPDATED QUESTIONS FOR TCC WITNESS AND RELATED MATTERS (.9).	2.90	4,640.00
03/07/24	MOXLEY	CALL WITH E. GOODMAN RE STRATEGY FOR CONTINUED HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION	1.00	1,250.00
03/08/24	GOODMAN	CONFERENCE CALL WITH TCC WITNESS REGARDING HEARING PREPARATION.	1.20	1,920.00
03/08/24	MOXLEY	CONFER WITH S. GRIFFITHS, M. ZIMMERMAN, AND E. GOODMAN REGARDING TRIAL PREPARATION AND PREPARE FOR SAME (1.3); PREPARE FOR CONTINUED HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (0.2)	1.50	1,875.00
03/09/24	GOODMAN	DRAFT AND EDIT CLOSING ARGUMENT.	1.40	2,240.00
03/11/24	CASTANO	RESEARCH RE: 9019 ISSUES FOR J. MEYERS.	6.50	4,192.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 15

Date	Professional	Description	Hours	Value
03/11/24	GOODMAN	DRAFT AND EDIT ADDITIONAL QUESTIONS FOR PERRY (.5); CONFERENCE WITH MR. MOXLEY REGARDING PERRY QUESTIONS AND RELATED MATTERS (.7).	1.20	1,920.00
03/11/24	MOXLEY	PREPARE FOR R. PERRY CROSS-EXAMINATION AND S. GRIFFITHS DIRECT	2.30	2,875.00
03/12/24	MCCAFFERTY	CIRCULATE TRANSCRIPT FROM HEARING (.1)	0.10	95.00
03/12/24	MOXLEY	PREPARE FOR S. GRIFFITHS DIRECT EXAMINATION AND CONTINUED HEARING (2.1); CONFER WITH S. GRIFFITHS AND M. ZIMMERMAN RE DIRECT EXAMINATION (1.1)	3.20	4,000.00
03/12/24	GOODMAN	DRAFT AND EDIT OUTLINE FOR ATKINSON DIRECT	1.80	2,880.00
03/13/24	GOODMAN	TELEPHONE CALLS WITH MR. BARTON REGARDING TRIAL TESTIMONY (.5); EDIT AND REVISE OUTLINE FOR ATKINSON DIRECT (1.7); FURTHER REVIEW OF PERRY CHART (.3).	2.50	4,000.00
03/13/24	MOXLEY	PREPARE FOR D. BARTON CONTINUED CROSS-EXAMINATION (1.0); CONFER WITH S. GRIFFITHS IN PREPARATION FOR DIRECT EXAMINATION (1.0); PREPARE FOR CONTINUED HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (1.2)	3.20	4,000.00
03/14/24	MCCAFFERTY	PREPARE FOR CONTINUED HEARING ON 9019 MOTION	0.20	190.00
03/14/24	GOODMAN	FURTHER REVISIONS TO OUTLINE FOR ATKINSON DIRECT (.5); TELEPHONE CALL WITH MR. MOXLEY REGARDING TRIAL STRATEGY (.6).	1.10	1,760.00
03/14/24	MOXLEY	PREPARE FOR CONTINUED HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION AND CALL WITH E. GOODMAN RE SAME (1.5); CONFER WITH S. GRIFFITHS IN PREPARING FOR HEARING (1.0)	2.50	3,125.00
03/15/24	WELLS	DRAFT PRO HAC VICE MOTION AND COORDINATE E-FILING ACCESS, RE: MOTION TO QUASH SUBPOENA	0.60	288.00
03/15/24	MOXLEY	PREPARE FOR CONTINUED HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS	0.30	375.00
03/18/24	MCCAFFERTY	PREPARE ANALYSIS OF I.LEFKOWITZ TESTIMONY FOR CONTINUED HEARING	0.20	190.00
03/18/24	GOODMAN	EDIT AND REVISE SCRIPT FOR CLOSING ARGUMENT.	1.80	2,880.00
03/18/24	MOXLEY	PREPARE FOR CONTINUED CROSS OF R. PERRY AND D. BARTON AND CONFER WITH J. MEYERS RE CROSS OF I. LEFKOWITZ	2.70	3,375.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 16

Date	Professional	Description	Hours	Value
03/19/24	MCCAFFERTY	REVIEW AND ANALYZE I.LEFKOWITZ TESTIMONY IN SUPPORT OF HEARING CROSS EXAMINATION	0.50	475.00
03/19/24	MOXLEY	PREPARE FOR CONTINUED CROSS OF R. PERRY AND PREPARE FOR DIRECT EXAMINATION OF S. GRIFFITHS AND SEPARATE CALLS WITH E. GOODMAN AND S. GRIFFITHS RE THE SAME	6.40	8,000.00
03/19/24	MEYERS	REVIEW AMENDED PROPOSED ORDER GRANTING 9019 MOTION AND DRAFT CROSS EXAMINATION QUESTIONS FOR LEFKOWITZ REGARDING THE SAME; DISCUSS LEFKOWITZ CROSS EXAMINATION INTERNALLY.	1.40	1,484.00
03/19/24	GOODMAN	TELEPHONE CALL WITH MR. MOXLEY REGARDING HEARING PREPARATION (1.1); DRAFT AND EDIT QUESTIONS FOR MR. PERRY (1.5); FURTHER REVIEW OF REVISED ORDER FOR RULE 9019 MOTION AND RELATED PLAN PROVISIONS (.6); REVIEW TRIAL TRANSCRIPT (1.9).	5.10	8,160.00
03/20/24	MCCAFFERTY	PREPARE WITNESS BINDERS FOR CONTINUED HEARING ON 9019 MOTION AND MOTION TO DISMISS (1.3); REVIEW AND ANALYZE LEFKOWITZ DEPOSITION TRANSCRIPT IN SUPPORT OF CROSS EXAMINATION AT HEARING (1.2)	2.50	2,375.00
03/20/24	GOODMAN	EDIT AND REVISE QUESTIONS FOR ATKINSON TESTIMONY (1.3); FURTHER REVIEW OF DEPOSITIONS TRANSCRIPT FOR ATKINSON (1.8); COMMUNICATIONS WITH MS. MCCAFFERTY REGARDING HEARING EXHIBITS (.1); TELEPHONE CALL WITH MR. MOXLEY REGARDING PERRY TESTIMONY (.9); CONFERENCE WITH MR. MOXLEY AND MR. GRIFFITHS REGARDING HEARING ON RULE 9019 MOTION (IN PART) (1.7); TELEPHONE CALL WITH MR. MOXLEY REGARDING HEARING PREPARATION (.1).	5.90	9,440.00
03/20/24	BURNS	CONFER WITH M. MCCAFFERTY AND C. MOXLEY REGARDING GRIFFITHS DEPOSITION TRANSCRIPT (.2); RETRIEVE AND CIRCULATE SAME (.3)	0.50	250.00
03/20/24	MOXLEY	PREPARE FOR CONTINUED CROSS-EXAMINATION OF R. PERRY (1.3); PREPARE FOR DIRECT EXAMINATION OF S. GRIFFITHS AND CONFER WITH S. GRIFFITHS AND E. GOODMAN RE THE SAME (7.5)	8.80	11,000.00
03/20/24	MEYERS	INVENTORY ADMITTED EXHIBITS AND EXHIBITS DEBTOR STIPULATED TO ADMIT.	0.30	318.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 17

Date	Professional	Description	Hours	Value
03/21/24	GOODMAN	CONFERENCE CALL WITH BROWN RUDNICK TEAM REGARDING CASE STRATEGY (.5); DRAFT AND EDIT QUESTION REGARDING DIP FUNDING (1.2); DRAFT AND EDIT MOTION TO COMPEL PAYMENT OF TCC FEES AND EXPENSES (4.3).	6.00	9,600.00
03/21/24	MCCAFFERTY	STRATEGIZE WITH TRIAL TEAM REGARDING CONTINUED HEARING (1.0); REVIEW AND ANALYZE I.LEFKOWITZ DEPOSITION TRANSCRIPT TO PREPARE CROSS EXAMINATION IMPEACHMENT (2.5); DRAFT SUMMARY OF IMPEACHMENT TESTIMONY FOR I.LEFKOWITZ (2.1); REVIEW AND ANALYZE I.LEFKOWITZ CREDITOR MEETING TRANSCRIPTS FOR IMPEACHMENT TESTIMONY (1.5); DRAFT SUMMARY OF I.LEFKOWITZ TESTIMONY FROM CREDITORS MEETING FOR IMPEACHMENT TESTIMONY (.8); PREPARE WITNESS BINDERS FOR HEARING (.8)	8.70	8,265.00
03/21/24	MEYERS	ATTEND INTERNAL CONFERENCE CALL TO DISCUSS TRIAL PREP AND CROSS EXAMINATION OF LEFKOWITZ; PREPARE OUTLINE FOR CROSS EXAMINATION OF LEFKOWITZ; DISCUSS CONTENT OF 341 TRANSCRIPTS IN PREPARATION FOR LEFKOWITZ CROSS EXAMINATION.	6.00	6,360.00
03/21/24	MOXLEY	PREPARE FOR R. PERRY CROSS-EXAMINATION AND S. GRIFFITHS DIRECT EXAMINATION AT CONTINUED HEARING	10.00	12,500.00
03/21/24	RIZKALLA	CONFER W/ E. CASTANO AND LEGAL RESEARCH RE: PLAN ISSUES	0.40	310.00
03/22/24	MCCAFFERTY	PREPARE WITNESS BINDER AND CROSS EXAMINATION TESTIMONY OF I.LEFKOWITZ FOR HEARING ON 9019 MOTION AND MOTION TO DISMISS (1.4); PREPARE WITNESS BINDER AND CROSS EXAMINATION TESTIMONY OF R.PERRY FOR HEARING ON 9019 MOTION AND MOTION TO DISMISS (1.5); PREPARE WITNESS BINDER AND CROSS EXAMINATION TESTIMONY OF M.ATKINSON FOR HEARING ON 9019 MOTION AND MOTION TO DISMISS (.3);	3.20	3,040.00
03/22/24	MEYERS	ATTEND INTERNAL CALL TO DISCUSS LEFKOWITZ CROSS; DRAFT OUTLINE FOR LEFKOWITZ CROSS EXAMINATION.	3.00	3,180.00
03/22/24	MOXLEY	PREPARE FOR S. GRIFFITHS DIRECT EXAMINATION AND FOR TRIAL	4.10	5,125.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 18

Date	Professional	Description	Hours	Value
03/22/24	GOODMAN	DRAFT AND EDIT MOTION TO COMPEL PAYMENT OF INTERIM COMPENSATION (1.5); RESEARCH IN SUPPORT OF MOTION TO COMPEL (1.0); CONFERENCE CALL WITH MS. MEYERS REGARDING LEFKOWITZ TESTIMONY AND HEARING PREPARATION (1.2)	3.70	5,920.00
03/23/24	MEYERS	PREPARE OUTLINE FOR LEFKOWITZ CROSS EXAMINATION AND COORDINATE PREPARATION OF WITNESS BINDERS FOR SAME.	5.00	5,300.00
03/23/24	MOXLEY	REVISE BARTON AND DUNDON CROSS OUTLINES	2.60	3,250.00
03/24/24	MCCAFFERTY	PREPARE S.GRIFFITHS FOR DIRECT AND CROSS EXAMINATION IN SUPPORT OF MOTION TO DISMISS AND 9019 MOTION HEARING (2.2); RESEARCH FACTS AND LAW IN SUPPORT OF CROSS EXAMINATION OF R.PERRY AT 9019 AND DISMISSAL HEARING (2.4); PREPARE EXHIBITS AND DIRECT EXAMINATION FOR M.ATKINSON IN SUPPORT OF 9019 AND DISMISSAL HEARING (3.5); PREPARE EXHIBITS FOR CROSS EXAMINATION OF R.PERRY, D.BARTON, AND M.DUNDON FOR 9019 AND DISMISSAL HEARING (3.5)	11.60	11,020.00
03/24/24	MOXLEY	MEETINGS WITH S. GRIFFITHS AND M. ATKINSON RE TRIAL PREPARATION AND REVISE WITNESS OUTLINES AND PREPARE FOR TRIAL	14.00	17,500.00
03/24/24	GOODMAN	EDIT AND REVISE CLOSING ARGUMENT SCRIPT (2.8); CONFERENCES WITH TRIAL TEAM REGARDING PREPARATION FOR HEARING RULE 9019 MOTION AND MOTION TO DISMISS (6.8).	9.60	15,360.00
03/25/24	MCCAFFERTY	PREPARE FOR HEARING ON 9019 MOTION AND MOTION TO DISMISS	3.70	3,515.00
03/25/24	GOODMAN	LAN AND PREPARING FOR HEARING ON RULE 9019 MOTION (1.5); POST-HEARING CONFERENCE WITH TRIAL TEAM (.5)	2.00	3,200.00
03/25/24	BURNS	DRAFT ECF TRANSCRIPT ORDER FORM FOR MARCH 25TH HEARING (.5); FILED SAME (.3)	0.80	400.00
03/25/24	BURNS	CONFER WITH M. MCCAFFERTY RE TRANSCRIPTS OF 341 MEETINGS	0.30	150.00
03/25/24	MOXLEY	PREPARE FOR CONTINUED HEARING ON RULE 9019 MOTION (2.5); FOLLOW-UP AND PREPARE FOR FINAL DAY OF HEARING (1.5)	4.00	5,000.00
03/26/24	MCCAFFERTY	PREPARE EXHIBITS AND CROSS EXAMINATION FOR D.BARTON AND M.DUNDON FOR 9019 MOTION AND MOTION TO DISMISS TRIAL	1.10	1,045.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 19

Date	Professional	Description	Hours	Value
03/26/24	GOODMAN	EDIT AND REVISE CLOSING ARGUMENT SCRIPT (2.4); EDIT AND REVISE QUESTIONS FOR MR. ATKINSON (3.4); MEETINGS WITH MR. ATKINSON TO PREPARE FOR COURT HEARING (3.0); CONFERENCE WITH MR. MOXLEY REGARDING BARTON TESTIMONY AND RELATED MATTERS (2.0).	10.80	17,280.00
03/26/24	MOXLEY	PREPARE FOR CROSS OF M. DUNDON AND D. BARTON AND FINAL DAY OF HEARING	12.80	16,000.00
03/26/24	BURNS	CONFER WITH M. MCCAFFERTY REGARDING OBTAINING TRANSCRIPT OF 3/25 HEARING (.2); CONFERRING WITH COURT PERSONNEL REGARDING SAME (.3)	0.50	250.00
03/26/24	MCCAFFERTY	PREPARE HEARING BINDERS FOR TRIAL ON 9019 MOTION AND MOTION TO DISMISS (3.6); DRAFT CROSS EXAMINATION AND PREPARE EXHIBITS FOR D.BARTON AND M. DUNDON IN SUPPORT OF TRIAL ON 9019 MOTION AND MOTION TO DISMISS (2.5); PREPARE DIRECT EXAMINATION AND EXHIBITS FOR M.ATKINSON IN SUPPORT OF TRIAL ON 9019 MOTION AND MOTION TO DISMISS (1.6)	7.70	7,315.00
03/26/24	CICERO	PREPARE FOR TRIAL DAY 4	6.00	9,000.00
03/27/24	MOXLEY	PREPARE FOR HEARING	1.50	1,875.00
03/27/24	BURNS	PREPARE MOTION TO COMPEL PAYMENT TO TCC PROFESSIONALS FOR FILING (.6); FILE SAME (.4);PREPARE ECF TRANSCRIPT REQUEST FOR MARCH 27TH HEARING (.6); FILE SAME (.3)	1.90	950.00
03/27/24	GOODMAN	PLAN AND PREPARE FOR HEARING ON RULE 9019 MOTION (1.5); POST-HEARING CONFERENCE WITH TRIAL TEAM (.4).	1.90	3,040.00
03/27/24	MCCAFFERTY	PREPARE EXHIBITS FOR TRIAL ON 9019 MOTION AND MOTION TO DISMISS	1.50	1,425.00
03/27/24	SIEGER-GRIMM	FOLLOW UP WITH D. MOLTON RE: HEARING	0.10	120.00
03/28/24	MCCAFFERTY	PREPARE EXHIBITS FOR DESTRUCTION POST HEARING	1.50	1,425.00
Total Hours and Fees			381.00	479,350.50

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	37.80 hours at	1,500.00	56,700.00
JESSICA N. MEYERS	28.70 hours at	1,060.00	30,422.00
D. C. MOXLEY	130.20 hours at	1,250.00	162,750.00
MEGHAN MCCAFFERTY	69.30 hours at	950.00	65,835.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 April 9, 2024

Invoice 6976463
 Page 20

Professional	Hours	Rate	Value
KELCEY C. WELLS	0.60 hours at	480.00	288.00
SUSAN SIEGER-GRIMM	7.00 hours at	1,200.00	8,400.00
ERIC R. GOODMAN	90.10 hours at	1,600.00	144,160.00
BRITTANY E. VEILLEUX	0.10 hours at	515.00	51.50
ELIZABETH C. CASTANO	7.20 hours at	645.00	4,644.00
ANDREW RIZKALLA	0.40 hours at	775.00	310.00
SHARIX A. ALICEA	3.60 hours at	775.00	2,790.00
THOMAS BURNS	6.00 hours at	500.00	3,000.00
Total Fees			479,350.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6976463
Date Apr 9, 2024
Client 040178

RE: NON-WORKING TRAVEL @ 50%

INVOICE

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0011	NON-WORKING TRAVEL @ 50%	59,420.00	0.00	59,420.00
	Total	59,420.00	0.00	59,420.00

Total Current Fees	\$59,420.00
Total Current Costs	\$0.00
Total Invoice	\$59,420.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 22

RE: NON-WORKING TRAVEL @ 50%

TIME DETAIL

Date	Professional	Description	Hours	Value
03/06/24	GOODMAN	RETURN TRAVEL FROM HOUSTON FOR HEARINGS ON RULE 9019 MOTION AND MOTION TO DISMISS (NON-WORKING TIME).	5.00	4,000.00
03/06/24	MCCAFFERTY	TRAVEL FROM HEARING IN HOUSTON	3.00	1,425.00
03/06/24	CICERO	RETURN TRAVEL FROM HOUSTON	8.00	6,000.00
03/06/24	MEYERS	RETURN TRAVEL FROM HEARING ON MOTIONS TO DISMISS AND TO APPROVE SETTLEMENT PURSUANT TO RULE 9019.	6.00	3,180.00
03/06/24	MOXLEY	TRAVEL FROM HOUSTON, TEXAS FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION	9.10	5,687.50
03/24/24	CICERO	TRAVEL FROM NJ TO HOUSTON TO HOTEL	7.00	5,250.00
03/24/24	GOODMAN	TRAVEL TO HOUSTON, TEXAS FOR COURT HEARINGS (NON-WORKING TRAVEL TIME)	4.20	3,360.00
03/24/24	MCCAFFERTY	TRAVEL TO HOUSTON FOR HEARING ON 9019 MOTION AND MOTION TO DISMISS	7.00	3,325.00
03/24/24	MEYERS	TRAVEL TO HOUSTON FOR CONTINUATION OF HEARING ON MOTIONS TO DISMISS AND TO APPROVE SETTLEMENT.	6.00	3,180.00
03/24/24	MOXLEY	TRAVEL TO HOUSTON, TX FOR CONTINUED HEARING	4.80	3,000.00
03/28/24	GOODMAN	RETURN TRAVEL FROM HOUSTON, TEXAS FOR COURT HEARING.	4.60	3,680.00
03/28/24	CICERO	RETURN TRAVEL FROM HOUSTON	6.00	4,500.00
03/28/24	MEYERS	RETURN FROM EVIDENTIARY HEARING IN TEXAS ON MOTIONS TO DISMISS AND FOR APPROVAL OF RULE 9019 SETTLEMENT.	6.50	3,445.00
03/28/24	MCCAFFERTY	TRAVEL FROM TEXAS FROM 9019 AND DISMISSAL HEARING	7.00	3,325.00
03/29/24	MOXLEY	TRAVEL FROM TEXAS FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION	9.70	6,062.50
Total Hours and Fees			93.90	59,420.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	21.00 hours at	750.00	15,750.00
JESSICA N. MEYERS	18.50 hours at	530.00	9,805.00
D. C. MOXLEY	23.60 hours at	625.00	14,750.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024

Invoice 6976463
Page 23

Professional	Hours	Rate	Value
MEGHAN MCCAFFERTY	17.00 hours at	475.00	8,075.00
ERIC R. GOODMAN	13.80 hours at	800.00	11,040.00
Total Fees			59,420.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6976463
Date Apr 9, 2024
Client 040178

RE: CLAIMS ADMINISTRATION AND OBJECTIONS

INVOICE

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0013	CLAIMS ADMINISTRATION AND OBJECTIONS	3,547.50	0.00	3,547.50
Total		3,547.50	0.00	3,547.50

Total Current Fees	\$3,547.50
Total Current Costs	\$0.00
Total Invoice	\$3,547.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 April 9, 2024

Invoice 6976463
 Page 25

RE: CLAIMS ADMINISTRATION AND OBJECTIONS

TIME DETAIL

Date	Professional	Description	Hours	Value
03/22/24	CASTANO	RESEARCH ON ADMINISTRATIVE EXPENSE CLAIMS FOR G. CICERO.	5.50	3,547.50
Total Hours and Fees			5.50	3,547.50

TIME SUMMARY

Professional	Hours	Rate	Value
ELIZABETH C. CASTANO	5.50 hours at	645.00	3,547.50
Total Fees			3,547.50



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6976463
Date Apr 9, 2024
Client 040178

RE: COURT ATTENDANCE

INVOICE

For professional services rendered in connection with the above captioned matter through March 31, 2024:

Matter No.	Matter Name	Fees	Costs	Total
040178.0016	COURT ATTENDANCE	259,085.00	0.00	259,085.00
Total		259,085.00	0.00	259,085.00

Total Current Fees	\$259,085.00
Total Current Costs	\$0.00
Total Invoice	\$259,085.00

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
April 9, 2024Invoice 6976463
Page 27

RE: COURT ATTENDANCE

TIME DETAIL

Date	Professional	Description	Hours	Value
03/01/24	MCCAFFERTY	PREPARE FOR TRIAL (2.5); ATTEND TRIAL ON RULE 9019 MOTION AND DISMISSAL (6.0)	8.50	8,075.00
03/01/24	GOODMAN	PLAN AND PREPARE FOR HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION (3.5); ATTEND HEARING ON MOTION TO DISMISS AND RULE 9019 MOTION (6.0); POST-HEARING CONFERENCE WITH LITIGATION TEAM REGARDING COURT HEARING (1.5)	11.00	17,600.00
03/01/24	CICERO	PREPARE FOR TRIAL (4.0); PARTICIPATE IN TRIAL (6.0)	10.00	15,000.00
03/01/24	MEYERS	PREPARE FOR AND ATTEND FIRST DAY OF HEARING ON MOTION TO DISMISS AND MOTION FOR RULE 9019 MOTION.	8.00	8,480.00
03/02/24	MOXLEY	PREPARE FOR TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS (3.0); ATTEND TRIAL, INCLUDING ARGUING MOTION IN LIMINE AND CROSS-EXAMINING D. BARTON (6.0); POST-TRIAL DISCUSSIONS AND PREPARE FOR SECOND DATE OF TRIAL (3.0)	12.00	15,000.00
03/05/24	GOODMAN	PLAN AND PREPARE FOR COURT HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (3.5); ATTEND HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS (6.0); POST-HEARING CONFERENCE WITH TRIAL TEAM (.5).	10.00	16,000.00
03/05/24	MEYERS	PREPARE FOR AND ATTEND HEARING ON MOTIONS TO DISMISS AND TO APPROVE 9019 SETTLEMENT.	7.00	7,420.00
03/05/24	MCCAFFERTY	PREPARE FOR HEARING ON 9019 MOTION AND DISMISSAL MOTION (1.8); ATTEND HEARING ON 9019 AND DISMISSAL MOTION (8.0)	9.80	9,310.00
03/05/24	CICERO	PREPARE FOR TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS (5.0) PARTICIPATE IN TRIAL ON RULE 9019 MOTION AND MOTION TO DISMISS (6.0)	11.00	16,500.00
03/05/24	MOXLEY	ATTEND HEARING AND CROSS-EXAMINE R. PERRY	6.00	7,500.00
03/15/24	MOXLEY	ATTEND HEARING ON MOTION TO DISMISS PERIGROVE 1018 LLC INVOLUNTARY PETITION TO EXTENT RELEVANT TO TEHUM BANKRUPTCY CASE AND DRAFT SUMMARY OF THE SAME	0.80	1,000.00



TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS' COMMITTEE
 April 9, 2024

Invoice 6976463
 Page 28

Date	Professional	Description	Hours	Value
03/25/24	CICERO	PREPARE FOR 9019/DISMISSAL HEARING (1.2); PARTICIPATE IN 9019/DISMISSAL HEARING (10.5)	11.70	17,550.00
03/25/24	MEYERS	PREPARE FOR AND ATTEND HEARING ON MOTIONS TO DISMISS AND APPROVE SETTLEMENT.	11.00	11,660.00
03/25/24	GOODMAN	ATTEND HEARING ON RULE 9019 MOTION BEFORE THE BANKRUPTCY COURT IN THE SOUTHERN DISTRICT OF TEXAS	10.50	16,800.00
03/25/24	MOXLEY	PARTICIPATE IN EVIDENTIARY HEARING AND HANDLING CROSS OF R. PERRY AND DIRECT OF S. GRIFFITHS	11.00	13,750.00
03/25/24	MCCAFFERTY	ATTEND HEARING ON 9019 MOTION AND MOTION TO DISMISS	11.00	10,450.00
03/27/24	CICERO	PREPARE FOR TRIAL (1.0); ATTEND TRIAL DAY 4 (11.5)	12.50	18,750.00
03/27/24	MEYERS	ATTEND FINAL DAY OF EVIDENTIARY HEARING ON MOTIONS TO DISMISS AND FOR APPROVAL OF RULE 9019 SETTLEMENT.	4.00	4,240.00
03/27/24	GOODMAN	ATTEND HEARING ON RULE 9019 MOTION AND MOTION TO DISMISS	11.00	17,600.00
03/27/24	MOXLEY	PARTICIPATE IN HEARING CROSSING D. BARTON AND M. DUNDON	12.00	15,000.00
03/27/24	MCCAFFERTY	ATTEND TRIAL ON 9019 MOTION AND MOTION TO DISMISS	12.00	11,400.00
Total Hours and Fees			200.80	259,085.00

TIME SUMMARY

Professional	Hours	Rate	Value
GERARD T. CICERO	45.20 hours at	1,500.00	67,800.00
JESSICA N. MEYERS	30.00 hours at	1,060.00	31,800.00
D. C. MOXLEY	41.80 hours at	1,250.00	52,250.00
MEGHAN MCCAFFERTY	41.30 hours at	950.00	39,235.00
ERIC R. GOODMAN	42.50 hours at	1,600.00	68,000.00
Total Fees			259,085.00

INCLUDES ONLY TIME AND COSTS TO DATE
 KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT
 PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

brownrudnick

TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Invoice 6976463
Date Apr 9, 2024
Client 040178

RE: TEHUM CARE SERVICES, INC., OFFICIAL TORT CLAIMANTS'
COMMITTEE

Remittance **remit**

Balance Due: \$701,603.06

To ensure proper credit to your account, please include this page with your payment.

Remittance Address

Brown Rudnick LLP
P.O. Box 23079
New York, NY 10087-3079

Wire Instructions

JP Morgan Chase
270 Park Avenue
New York, NY 10017
ABA Number: 021000021
SWIFT Code: CHASUS33

For Credit To

Brown Rudnick LLP Deposit Account
Account Number: 760367067

EXHIBIT E

SUPPLEMENT TO FIRST INTERIM FEE APPLICATION

Brown Rudnick LLP (“Brown Rudnick”) files this Supplement in support of its First Interim Fee Application. Brown Rudnick believes that the fees and expenses sought by its First Interim Fee Application are reasonable given the litigation strategy pursued here by the Debtor and the UCC. While the Local Form does not call for an extended narrative, Brown Rudnick submits the following Supplement in support of its First Interim Fee Application.

The Appointment of the TCC

On November 20, 2023, the Office of the United State Trustee (the “U.S. Trustee”) formed the Tort Claimants’ Committee in this chapter 11 case (the “TCC”). On November 21, 2023, the TCC selected Brown Rudnick as its proposed co-counsel. After retaining Brown Rudnick, the TCC instructed Brown Rudnick to consider whether dismissal would be appropriate. Brown Rudnick analyzed this issue. Brown Rudnick also urged the TCC to participate in mediation and determine if a consensual resolution is possible.

December 14, 2023, Mediation

The TCC was invited to participate in a mediation held in New York on December 14, 2023. The TCC attended this mediation. On or about the date of the first mediation with the TCC, in December 2023, the Debtor and the UCC provided the TCC with access to approximately 600,000 pages of information. At that time, the Debtor and the UCC informed the TCC that the TCC had access to all documents that were available to the Debtor and the UCC.

On December 19, 2023, the TCC hired Province, LLC (“Province”) as its financial advisor to assist it with, among other things, reviewing the documents provided by the Debtor and the UCC. Contrary to their representations to the TCC, the Debtor and the UCC did not provide the TCC with access to certain key documents until January 30, 2024. Following the December 14, 2023, the TCC made it clear to the Debtor and the UCC that it needed to evaluate the estate causes of action that the Debtor and the UCC were seeking to settle. The TCC had two primary concerns.

First, the TCC was concerned that the Debtor (which is controlled by Mr. Lefkowitz through funding) had not identified all the causes of action that could be asserted by the estate against Mr. Lefkowitz, YesCare, and other non-debtor affiliates and insiders. The TCC directed Brown Rudnick to evaluate all potential causes of action that the Debtor could attempt to settle as part of a global settlement. The TCC ultimately identified seven potential causes of action.

Second, the TCC was concerned that the Debtor and the UCC did not have sufficient information to value the causes of action that they had identified, including the potential avoidance actions arising out of the divisional merger. Based on representations made by the Debtor’s counsel on January 2, 2024, it was clear to the TCC that the Debtor and the UCC did not have sufficient information available to them to value the causes of action arising out of the divisional merger.

The Debtor and the UCC Elect to Push Forward with Their Settlement

At a status conference held on December 18, 2023, the Debtor and the UCC announced the settlement that they had negotiated during the December 14, 2023, mediation, without the TCC, and that they were prepared to move forward with that settlement. The TCC warned the Debtor and the UCC that if a Rule 9019 motion was filed prematurely, without an adequate basis, given that the TCC believed that dismissal was warranted, the TCC would seek dismissal.

A few weeks later, on January 9, 2024, the Debtor filed a motion and stated clearly and unequivocally that the Debtor, the UCC, and certain non-debtor parties had agreed to the terms of a settlement which would be the subject of a Rule 9019 motion “to be filed **in the next several days**.” Dkt. No. 1244 at ¶ 13 (emphasis added). Based on the Debtor’s representations, it was clear to the TCC that the filing of a Rule 9019 motion was now imminent.

Further, seven days earlier (on January 2, 2024), the Debtor’s counsel informed the TCC’s financial advisor that “the Debtor does **not** have any YesCare financials post-[Divisional Merger], other than a balance sheet showing the allocation of assets and liabilities as of the [Divisional Merger], which we previously provided you. I reached out to counsel to YesCare, and YesCare indicated that they will **not produce financial** information other than the balance sheet referenced above.” See Jan. 2, 2024, *Email from Ms. Webb to Mr. Atkinson* (TCC 331) (emphasis added).

The TCC understood this to mean that the Debtor was intending to move forward with a settlement without sufficient information to value certain of the claims that the Debtor and the UCC were proposing to settle. The TCC could not understand how the Debtor could move forward with a settlement when YesCare was refusing to produce its financial records, including the records reflecting a billion-dollar contract with the State of Alabama.

On January 16, 2024, consistent with the Debtor’s representations to the Court, the Debtor and the UCC filed their Rule 9019 Motion. See Dkt. No. 1259. The Rule 9019 Motion stated that the Debtor and the UCC had identified “four main categories of potential claims” against the released parties, all of which were avoidance actions. *Id.* at ¶ 27. One of the avoidance actions identified in the Rule 9019 Motion was the avoidance action related to the divisional merger, although no value was assigned to this avoidance action. See *id.* at ¶ 34.

Hours later, on January 16, 2024, the TCC filed its Motion to Dismiss. See Dkt. No. 1260. The TCC’s Motion to Dismiss was joined by multiple *pro se* claimants, the U.S. Trustee, and various public service organizations committed to defending the rights of incarcerated individuals (including *pro se* claimants). See Dkt. No. 1283, 1305, 1329, 1331, 1337, 1340, 1345, 1348, 1367 & 1389. Many of these same parties also opposed the Rule 9019 Motion.

The Debtor and the UCC Refuse to Mediate and Stay Litigation

Shortly after these filings, the TCC—through Brown Rudnick—offered to engage in further mediation. See Dkt. No. 1303 at ¶ 11. The TCC suggested that the parties agree to a stay of litigation and discovery while mediation took place so that no estate resources would be spent on discovery and trial preparation while mediation took place. *Id.* The UCC and the Debtor rejected this proposal. The TCC learned at trial that the UCC’s counsel did not advise the Chair of the UCC that the TCC made this proposal and wanted to mediate with the UCC.

The Debtor and the UCC wanted to move forward as quickly as possible with the Rule 9019 Motion. The rush to litigation may have been motivated by the case deadlines imposed by M2 LoanCo in the proposed Fifth Interim DIP Order (Dkt. No. 1258), as well as the desire to provide the TCC with a little time as possible to mount an effective opposition to the proposed settlement.

Contentious Litigation

The litigation that ensued was highly contentious and required Brown Rudnick to devote considerable time and resources to this case. The Debtor and the UCC would not agree on a litigation schedule that provided the TCC with adequate time to enforce a subpoena against YesCare. Mr. Lefkowitz initially refused to accept service of a subpoena and personally threatened Brown Rudnick attorneys. *See* Dkt. No. 1288 at Ex. A. YesCare refused to produce key documents bearing on the value of the assets transferred to YesCare under the divisional merger.

The Debtor's and the UCC's respective counsel instructed their witnesses to not answer questions at deposition based on dubious assertions of the attorney-client privilege, work product doctrines, and mediation privilege. This led to additional motion practice (*see* Dkt. Nos. 1402 & 1422) and impaired the TCC's efforts to discover the factual basis supporting the Debtor's and the UCC's positions. During the first interim period, Brown Rudnick devoted considerable time to opposing to the Rule 9019 Motion and pursuing discovery. *See* Dkt. No. 1386. Brown Rudnick also prepared and filed an objection to the Debtor's motion to extend exclusivity (*see* Dkt. No 1303) and the proposed Fifth Interim DIP Order (*see* Dkt. No. 1332).

The Court Denies the Rule 9019 Motion and the Motion to Dismiss

On April 11, 2024, the Court denied the Rule 9019 Motion and the Motion to Dismiss. *See* Dkt. Nos. 1505 & 1506. Since the Court's rulings, the Debtor and the UCC have agreed to engage in further mediation with the TCC, which mediation is scheduled to take place on May 6, 2024. The TCC has also renewed its requests that YesCare produce the financial information that the TCC has been seeking since December 2023. As of the date of this First Interim Fee Application, that information has not been produced.

Brown Rudnick believes that the fees and expenses sought by the First Interim Fee Application are appropriate and reasonable. Brown Rudnick's advocacy on behalf of the TCC has drawn public praise from the American Civil Liberties Union, the Center for Constitutional Rights, Human Rights Defense Center, Public Justice, Rights Behind Bars, and the UC Berkeley Center for Consumer Law & Economic Justice, as well as Senator Elizabeth Warren.

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

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

Re: Docket No. _____

**ORDER GRANTING FIRST INTERIM FEE APPLICATION
OF BROWN RUDNICK LLP FOR COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES INCURRED AS
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS
FOR THE PERIOD FROM NOVEMBER 22, 2023, THROUGH MARCH 31, 2024**

The Court has considered the *First Interim Fee Application of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from November 22, 2023, through March 31, 2024* (the “Application”) filed by Brown Rudnick LLP (the “Applicant”). The Court hereby orders that:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of \$2,817,222.91 for the period set forth in the Application.
2. The Debtor is authorized and directed to disburse any unpaid amounts allowed by Paragraph 1 of this Order within three (3) business days of the entry of this Order. The Applicant shall promptly notify the Court if payment is not received within three (3) business days of the entry of this Order.
3. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon entry.

¹ The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

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

Signed: _____, 2024

Christopher López
United States Bankruptcy Judge