# UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

| In Day                     | )                              |
|----------------------------|--------------------------------|
| In Re:                     | ) Chapter 11                   |
| TELEXFREE, LLC,            | ) Case No. 14-40987-MSH        |
| TELEXFREE, INC.,           | ) Case No. 14-40988-MSH        |
| TELEXFREE FINANCIAL, INC., | ) Case No. 14-40989-MSH        |
| Reorganized Debtors.       | ) Substantively Consolidated ) |

# SUPPLEMENT TO THE SIXTH AND FINAL APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES BY HURON CONSULTING SERVICES, LLC AS SUCCESSOR ACCOUNTANT AND FINANCIAL ADVISOR TO STEPHEN B. DARR, CHAPTER 11 TRUSTEE

To The Honorable Melvin S. Hoffman, United States Bankruptcy Judge:

Huron Consulting Services, LLC ("Huron"), successor accountant and financial advisor to Stephen B. Darr, the duly appointed Chapter 11 trustee (the "Trustee") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors") respectfully submits this Supplement to the Sixth and Final Application for Compensation and Reimbursement of Expenses (the "Application") for the period from April 1, 2018 through July 14, 2020 ("Application Period").

1. On July 24, 2020, Huron filed the Application which sought approval and payment of fees in the amount of \$5,431,205.00 and reimbursement of expenses in the sum of \$25,527.50 for services rendered and expenses incurred during the Application Period. The Application included the actual amounts for services rendered and expenses incurred through June 30, 2020 and estimated fees and expenses of \$100,000 for the period from July 1, 2020 through the Effective Date of the Plan July 14, 2020 (the "Supplemental Period"). As set forth in



the Application, Huron represented that it would file a supplement to the Application reflecting the actual amount of fees and expenses relating to the Supplemental Period for which approval is sought.

- 2. During the Supplemental Period, Huron expended a total of 157.1 hours in this matter for total requested compensation of \$82,370 resulting in an average hourly rate of \$524.32. As set forth in its retention application, Huron agreed to a blended hourly rate not to exceed \$550 per hour for each fee application.<sup>1</sup>
- 3. The fees sought in services rendered during the Supplemental Period are supported by the exhibits attached to this application:
  - (i) Exhibit A are the names, titles, hourly rates, and a summary of hours charged, and the fees incurred at Huron's regular hourly rates sought for each professional whose services are being billed;
  - (ii) Exhibit B contains a summary of hours and fees billed by category;
  - (iii) Exhibits C and C-1 contain a summary and detail of expense reimbursements requested by category; and
  - (iv) Exhibits D-1 through D-11 contain detailed daily descriptions of services rendered by category.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> As set forth in Huron's retention application, for each fee application, Huron will calculate its blended rate as total fees divided by total hours. Should that blended rate exceed \$550 per hour, Huron will reduce its requested fees by an amount sufficient to result in a \$550 per hour blended rate.

<sup>&</sup>lt;sup>2</sup> A narrative description of the services rendered by Huron is included in the Application.

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WHEREFORE, Huron respectfully moves the Court for an Order:

(i) approving on a final basis fees in the sum of \$5,413,575.00 and reimbursement of expenses in the sum of \$25,527.50 for services rendered and expenses incurred during the Sixth and Final Application Period and the Supplemental Period;

- (ii) authorizing payment of the foregoing amounts;
- (iii) Approving as final all fees and expenses previously approved by the Court on an interim basis; and
- (iv) granting such other relief as is just and proper.

Dated: August 6, 2020

Respectfully submitted:

/s/ Timothy J. Martin
Timothy J. Martin
Managing Director
Huron Consulting Services, LLC
100 High St., Suite 2301
Boston, MA 02110
(617) 226-5530

ACCOUNTANT AND FINANCIAL ADVISOR
TO THE TRUSTEE

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# EXHIBIT B

# TELEXFREE Summary of Hours Incurred by Category July 1, 2020 through July 14, 2020

|      | Time Category   | Hours | Fees         |
|------|---|-------|--------------|
| D-1  | Services Relating to Litigation / Avoidance Actions           | 1.1   | \$<br>715.00 |
| D-2  | Services Relating to Asset Analysis / Investigation           |       | -            |
| D-3  | Services Relating to Claims Administration                    | 5.7   | 3,135.00     |
| D-4  | Services Relating to Fee/Employment Applications              | 15.5  | 8,655.00     |
| D-5  | Services Relating to Case Administration                      |       | -            |
| D-6  | Services Relating to Meetings with Government Agencies        |       | -            |
| D-7  | Services Relating to Claim Objections                         | 41.9  | 20,472.50    |
| D-8  | Travel  |       | -            |
| D-9  | Services Relating to Communications with Creditors            | 76.3  | 38,557.50    |
| D-10 | Services Relating to Disclosure Statement, Plan, Confirmation | 16.1  | 10,435.00    |
| D-11 | Services Relating to Meetings with Trustee or Counsel         | 0.5   | 400.00       |

**Total Hours and Fees Requested** 

157.1 \$ 82,370.00

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### EXHIBIT D-1

### TELEXFREE

Services Relating to Litigation / Avoidance Actions July 1, 2020 through July 14, 2020

| Name                | Date                   | Description  | Time | F  | Rate | I  | Amount |
|---------------------|------------------------|--|------|----|------|----|--------|
| Sorondo, Jean-Louis | 7/7/2020 Perform fir   | nal review of data export to be sent to Stoneturn. | 1.1  | \$ | 650  | \$ | 715.00 |
|                     |                        |  |      |    |      |    |        |
| 7                   | otal Services Relating | to Litigation / Avoidance Actions                  | 1.1  |    |      | \$ | 715.00 |

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# EXHIBIT D-2

TELEXFREE
Services Relating to Asset Analysis / Investigation
July 1, 2020 through July 14, 2020

| Name | Date                   | Description                          | Time | Rate | Amount      |
|------|------------------------|--------------------------------------|------|------|-------------|
|      | Total Services Relatin | ng to Asset Analysis / Investigation |      |      | <i>\$</i> - |

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# **EXHIBIT D-3**

### TELEXFREE

Services Relating to Claims Administration July 1, 2020 through July 14, 2020

| Name                | Date              | Description  | Time Rate |    | Rate | Amount |          |
|---------------------|-------------------|--|-----------|----|------|--------|----------|
| Berardino, Emma     | 7/6/2020 Resea    | arch and manually review claim 106610-000.                         | 0.90      | \$ | 400  | \$     | 360.00   |
|                     | Revie             | ew organization and documentation of claimant emails re: change of |           |    |      |        |          |
| Goldsmith, Zachary  | 7/8/2020 claim    | ant information $(6/1 - 6/3)$ .                                    | 2.20      |    | 425  |        | 935.00   |
| Sorondo, Jean-Louis | 7/9/2020 Upda     | te noticing information in claim register.                         | 1.60      |    | 650  |        | 1,040.00 |
| Martin, Timothy     | 7/13/2020 Discu   | ssion with J. Miller (KCC) regarding noticing of claim transfers.  | 0.20      |    | 800  |        | 160.00   |
| Martin, Timothy     | 7/13/2020 Revie   | ew of noticing lists for claim transfers.                          | 0.80      |    | 800  |        | 640.00   |
|                     | Total Services Re | lating to Claims Administration                                    | 5.7       | -  |      | \$     | 3,135.00 |

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# EXHIBIT D-4

### TELEXFREE

Services Relating to Fee/Employment Applications July 1, 2020 through July 14, 2020

| Name                | Date        | Description   | Time | Rate   | Amount      |
|---------------------|-------------|---|------|--------|-------------|
| Joseph, Anju P      | 7/1/2020    | Consolidate all detail received through month-end of June 2020, review detail, assign categories and edit as appropriate. | 1.90 | \$ 550 | \$ 1,045.00 |
| Joseph, Anju P      | 7/1/2020    | Review remaining time received through the end of June 2020 from billings and request missing detail.                     | 1.70 | 550    | 935.00      |
| Joseph, Anju P      | 7/1/2020    | Create monthly summaries of time by category and check for accuracy.  | 0.40 | 550    | 220.00      |
| Joseph, Anju P      | 7/10/2020   | Edit fee narrative to reflect current period detail.  | 1.00 | 550    | 550.00      |
| Sorondo, Jean-Louis | 7/13/2020   | Prepare initial set of fee application exhibits for discussion with T. Martin (HBA).                                      | 2.20 | 650    | 1,430.00    |
| Berardino, Emma     | 7/14/2020   | Aggregate claim review statistics for Fifth Fee Application.  | 2.90 | 400    | 1,160.00    |
| Berardino, Emma     | 7/14/2020   | Discuss Fifth Fee Application with T. Martin J. Sorondo and A. Joseph (all HBA).  | 0.50 | 400    | 200.00      |
| Joseph, Anju P      | 7/14/2020   | Call with J. Sorondo, E. Bernardino, and T. Martin (all HBA) on finalizing fee application and categories.                | 0.50 | 550    | 275.00      |
| Joseph, Anju P      | 7/14/2020   | Edit expense detail and reconcile time to capture updated write-offs.   | 0.20 | 550    | 110.00      |
| Sorondo, Jean-Louis | 7/14/2020   | Review and recategorize time entry per discussion with T. Martin (HBA).   | 2.30 | 650    | 1,495.00    |
| Sorondo, Jean-Louis | 7/14/2020   | Draft sections of fee application narrative pertaining to claims administration.  | 1.90 | 650    | 1,235.00    |
|                     | Total Servi | ces Relating to Fee / Employment Applications   | 15.5 |        | \$ 8,655.00 |

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# EXHIBIT D-5

TELEXFREE
Services Relating to Case Administration
July 1, 2020 through July 14, 2020

| Name   | Date | Description | Time | Rate | Amount     |
|--|------|-------------|------|------|------------|
|  |      |             |      |      |            |
| Total Services Relating to Case Administration |      |             |      |      | <i>s</i> - |

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# EXHIBIT D-6

# TELEXFREE

Services Relating to Meetings with Government Agencies July 1, 2020 through July 14, 2020

| Name | Date                | Description                                | Time | Rate | Amo | unt |
|------|---------------------|--|------|------|-----|-----|
|      |                     |  |      |      |     |     |
|      | Total Services Rela | ating to Meetings with Government Agencies | -    |      | \$  | -   |

#### **EXHIBIT D-7**

# TELEXFREE Services Relating to Claim Objections July 1, 2020 through July 14, 2020

Time Name Date Description Rate Amount 7/1/2020 Review of newly received documents related to claim #106510-000. 0.30 \$ 800 Martin, Timothy \$ 240.00 7/1/2020 Review of claim support provided by Kirschner. 800 Martin, Timothy 0.30 240.00 Martin, Timothy 7/1/2020 Review of Borges claim dispute information. 0.20 800 160.00 Martin, Timothy 7/1/2020 Review of documents in connection with Tenth Omnibus objection. 0.30 800 240.00 Record additional responses to Motions to Disallow Non-Participant 7/6/2020 Claims. 0.40 400 160.00 Berardino, Emma 7/6/2020 Review draft stipulation related to Shapiro claims. Martin, Timothy 0.30 800 240.00 Create support packages for AF Consultores claims that remain under Berardino, Emma 7/7/2020 dispute following 9th Omnibus Objection hearing. 2.40 400 960.00 Berardino, Emma 7/7/2020 Discuss AF Consultores claims under dispute with J. Sorondo (HBA). 1.10 400 440.00 Create disputed claims summary for AF Consultores claims that remain 400 Berardino, Emma 7/7/2020 under dispute. 0.80 320.00 Berardino, Emma 7/7/2020 Review response history and Net Equity for claim 07863-001. 0.60 400 240.00 Berardino, Emma 7/7/2020 Create Net Equity summary and manually review claim 50200-001. 0.60 400 240.00 Sorondo, Jean-Louis 7/7/2020 Research remaining unresolved AFC claims and prepare schedule. 1.20 650 780.00 Sorondo, Jean-Louis 7/7/2020 Review unresolved claims with E. Berardino (HBA). 650 650.00 1.00 Update claim register for changes related to the June 30 hearing and Berardino, Emma 7/8/2020 settled claims filed by Jordan Shapiro. 2.10 400 840.00 Review and create support packages for AF Consultores claims 36814-7/8/2020 000 54482-000 72220-001 and 65505-000. Berardino, Emma 1.30 400 520.00 Review and create support packages for AF Consultores claims 01426-7/8/2020 000 and 105465-000. Berardino, Emma 0.80 320.00 400 Berardino, Emma 7/8/2020 Finalize reconciliation of claims register to current allowed claims status. 0.70 400 280.00 Berardino, Emma 7/8/2020 Discuss claim register reconciliation with J Sorondo (HBA). 400 0.60 240.00 Discuss summary of disputed and resolved claims with J. Sorondo Berardino, Emma 7/8/2020 (HBA). 0.40 400 160.00 Discuss claims status and objections to be filed with A. Lizotte Berardino, Emma 7/8/2020 (Counsel). 0.20 400 80.00 Review and organization of dockets relating to claimant letters to the 425 Goldsmith, Zachary 7/8/2020 court. 1.50 637.50 Sorondo, Jean-Louis 7/8/2020 Summarize unresolved claims and research additional information. 2.40 650 1,560.00 Modify AF Consultores Disputed claims summary for 9th Omnibus Berardino, Emma 7/9/2020 Objection claims still disputed. 1.20 400 480.00 Berardino, Emma 7/9/2020 Update listing of Non-Participant Docket Responses to date. 0.60 400 240.00 7/9/2020 Manual review of Net Equity and objection history for claim 11384-000. 400 200.00 Berardino, Emma 0.50 7/9/2020 Research docketed claim inquiry for claim 52054-000. 0.20 400 80.00 Berardino, Emma 7/9/2020 Review of Tenth and Eleventh Omnibus objections. 800 Martin, Timothy 1.40 1,120.00 Perform quality control of AF Consultores 9th Omnibus Objection Berardino, Emma 7/10/2020 disputed claims exhibits for Martin Affidavit. 2.20 400 880.00 Berardino, Emma 7/10/2020 Finalize 10th and 11th Omnibus Objection exhibits for filing. 1.30 400 520.00 Review and organization of dockets relating to claimant letters to the 2.40 Goldsmith, Zachary 7/10/2020 court. 425 1,020.00 Martin, Timothy 7/10/2020 Continued review of Tenth and Eleventh Omnibus objections. 800 720.00 0.90 Sorondo, Jean-Louis 7/10/2020 Research various inquiries on claims by M. Llenas of AF Consultores. 2.10 650 1,365.00 7/10/2020 Review Ninth Omnibus objection support packages. Sorondo, Jean-Louis 0.50 650 325.00 7/10/2020 Review Tenth and Eleventh Omnibus objections for accuracy. 0.70 455.00 Sorondo, Jean-Louis 650

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# EXHIBIT D-7

# TELEXFREE Services Relating to Claim Objections July 1, 2020 through July 14, 2020

| Name            | Date          | Description  | Time | Rate | Amount       |
|-----------------|---------------|--|------|------|--------------|
|                 |               | Perform data aggregation for 7th Affidavit of Claim Allowance or   |      |      |              |
| Berardino, Emma | 7/13/2020     | Disallowance.  | 1.10 | 400  | 440.00       |
| Berardino, Emma | 7/13/2020     | Finalize 11th Omnibus Objection to Claims.   | 0.70 | 400  | 280.00       |
|                 |               | Communicate with KCC regarding noticing of 10th and 11th Omnibus   |      |      |              |
| Berardino, Emma | 7/13/2020     | Objections to Claims.  | 0.60 | 400  | 240.00       |
| Berardino, Emma | 7/13/2020     | Research and correspond regarding claim 70874-000.   | 0.20 | 400  | 80.00        |
| Martin, Timothy | 7/13/2020     | Final review of Tenth and Eleventh Omnibus objections.   | 0.40 | 800  | 320.00       |
|                 |               | Analyze several claims to be included on 7th Affidavit of Claim  |      |      |              |
| Berardino, Emma | 7/14/2020     | Allowance or Disallowance.   | 2.40 | 400  | 960.00       |
| Berardino, Emma | ,             | Draft Exhibit A to 7th Affidavit of Claim Allowance or Disallowance.  Reconcile claims register to 7th Affidavit of Claim Allowance or | 1.90 | 400  | 760.00       |
| Berardino, Emma |               | Disallowance.  | 1.10 | 400  | 440.00       |
|                 | Total Service | es Relating to Claim Objections  | 41.9 | =    | \$ 20,472.50 |

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# EXHIBIT D-8

TELEXFREE Travel July 1, 2020 through July 14, 2020

| Name | Date         | Description | Time | Rate | Amount |
|------|--------------|-------------|------|------|--------|
|      |              |             |      |      |        |
|      | Total Travel |             |      |      | \$ -   |

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# EXHIBIT D-9

### TELEXFREE

Services Relating to Communications with Creditors July 1, 2020 through July 14, 2020

| Name                | Date Description   | Time | Rate   | Amount    |
|---------------------|--|------|--------|-----------|
| Martin, Timothy     | 7/1/2020 Attend to inquiries regarding ballot forms.   | 0.40 | \$ 800 | \$ 320.00 |
| Sorondo, Jean-Louis | 7/1/2020 Respond to backlogged claimant inquiries.   | 1.60 | 650    | 1,040.00  |
| Sorondo, Jean-Louis | 7/1/2020 Respond to claimant inquires and update information.  | 1.40 | 650    | 910.00    |
| Sorondo, Jean-Louis | 7/2/2020 Review claim response email and respond as needed.  | 2.80 | 650    | 1,820.00  |
| Sorondo, Jean-Louis | 7/2/2020 Research and respond to claimant requests for information.  | 2.70 | 650    | 1,755.00  |
| Berardino, Emma     | 7/6/2020 Address 61 inquiries sent to ClaimResponse regarding balloting and other matters.                                   | 2.80 | 400    | 1,120.00  |
| Berardino, Emma     | 7/6/2020 Address 49 emails sent to ClaimResponse related to balloting and other matters.                                     | 2.30 | 400    | 920.00    |
| Berardino, Emma     | 7/6/2020 Call or email 11 claimants who called the Trustee with inquiries the week of 6/29/20.                               | 1.80 | 400    | 720.00    |
| Berardino, Emma     | 7/6/2020 Continue to review and correspond regarding claim 106610-000.   | 0.60 | 400    | 240.00    |
| Berardino, Emma     | 7/6/2020 Address docketed response regarding claim 79747-000.  | 0.20 | 400    | 80.00     |
| Berardino, Emma     | 7/6/2020 Address inquiry regarding claim 52054-000 sent to Murphy and King.  | 0.20 | 400    | 80.00     |
| Berardino, Emma     | 7/6/2020 Address inquiry regarding claim 105131-001 sent to Murphy and King.   | 0.10 | 400    | 40.00     |
| Berardino, Emma     | 7/6/2020 Address inquiry regarding claim 70874-000 sent to the Trustee.  | 0.10 | 400    | 40.00     |
| Martin, Timothy     | 7/6/2020 Attend to questions regarding claim transfer to which claimant objection to authenticity.                           | 0.80 | 800    | 640.00    |
| Sorondo, Jean-Louis | 7/6/2020 Research and respond to claimant inquiries in claim response.   | 2.90 | 650    | 1,885.00  |
| Sorondo, Jean-Louis | 7/6/2020 Respond to claimant email requests for information.   | 2.20 | 650    | 1,430.00  |
| Berardino, Emma     | 7/7/2020 Address 48 emails sent to ClaimResponse regarding balloting and other matters.                                      | 2.70 | 400    | 1,080.00  |
| Berardino, Emma     | 7/7/2020 Manually review and correspond regarding claim 16069-000.   | 0.40 | 400    | 160.00    |
| Sorondo, Jean-Louis | 7/7/2020 Respond to claimant inquiries regarding payment information.  | 2.80 | 650    | 1,820.00  |
| Sorondo, Jean-Louis | 7/8/2020 Respond to claimant requests for information about their claims.  | 1.50 | 650    | 975.00    |
| Sorondo, Jean-Louis | 7/8/2020 Respond to claimant inquiries for balloting information ahead of deadline.  | 1.40 | 650    | 910.00    |
| Berardino, Emma     | 7/9/2020 Address 52 emails sent to ClaimResponse regarding balloting and other matters.                                      | 2.80 | 400    | 1,120.00  |
| Berardino, Emma     | 7/9/2020 Address 47 emails sent to ClaimResponse regarding balloting and other matters.                                      | 2.70 | 400    | 1,080.00  |
| Goldsmith, Zachary  | 7/9/2020 Review claimant emails (6/1 -6/3) related to address updates and claim status and updates to claims registry site.  | 2.90 | 425    | 1,232.50  |
| Goldsmith, Zachary  | 7/9/2020 Review claimant emails (6/3 -6/5) related to address updates and claim status and updates to claims registry site.  | 2.20 | 425    | 935.00    |
| Sorondo, Jean-Louis | 7/9/2020 Respond to claimant inquiries and forward balloting requests to questions.  | 2.20 | 650    | 1,430.00  |
| Sorondo, Jean-Louis | 7/9/2020 Review claimant emails and categorize responses.  | 1.80 | 650    | 1,170.00  |
| Berardino, Emma     | 7/10/2020 Address 38 emails sent to ClaimResponse regarding balloting and other matters.                                     | 2.40 | 400    | 960.00    |
| Berardino, Emma     | 7/10/2020 Address 26 emails sent to ClaimResponse regarding balloting and other matters.                                     | 1.80 | 400    | 720.00    |
| Goldsmith, Zachary  | 7/10/2020 Review claimant emails (6/5 -6/7) related to address updates and claim status and updates to claims registry site. | 2.20 | 425    | 935.00    |
| Goldsmith, Zachary  | 7/10/2020 Review claimant emails (6/7 -6/8) related to address updates and claim status and updates to claims registry site. | 0.90 | 425    | 382.50    |
| Sorondo, Jean-Louis | 7/10/2020 Reply to claimants with requests for information about their claims.   | 2.80 | 650    | 1,820.00  |
| Berardino, Emma     | 7/13/2020 Address 46 emails sent to ClaimResponse regarding payment portal and other matters.                                | 2.90 | 400    | 1,160.00  |
| Berardino, Emma     | 7/13/2020 Address 43 emails sent to ClaimResponse regarding payment portal and other matters.                                | 2.80 | 400    | 1,120.00  |

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# EXHIBIT D-9

### TELEXFREE

Services Relating to Communications with Creditors July 1, 2020 through July 14, 2020

| Name                | Date        | Description   | Time | Rate | Amount       |
|---------------------|-------------|---|------|------|--------------|
| Goldsmith, Zachary  | 7/13/2020 F | Review claimant emails (6/12-6/18) related to address updates and claim | 2.70 | 425  | 1,147.50     |
|                     | s           | tatus and updates to claims registry site.                              |      |      |              |
| Goldsmith, Zachary  | 7/13/2020 F | Review claimant emails (6/2-6/12) related to address updates and claim  | 2.20 | 425  | 935.00       |
|                     | S           | tatus and updates to claims registry site.                              |      |      |              |
| Sorondo, Jean-Louis | 7/13/2020 F | Respond to various claimant inquiries regarding status.                 | 2.10 | 650  | 1,365.00     |
| Goldsmith, Zachary  | 7/14/2020 F | Review claimant emails (6/22-6/26) related to address updates and claim | 2.90 | 425  | 1,232.50     |
|                     | s           | tatus and updates to claims registry site.                              |      |      |              |
| Goldsmith, Zachary  | 7/14/2020 F | Review claimant emails (6/26-6/30) related to address updates and claim | 2.50 | 425  | 1,062.50     |
|                     | s           | tatus and updates to claims registry site.                              |      |      |              |
| Goldsmith, Zachary  | 7/14/2020 F | Review claimant emails (6/18-6/22) related to address updates and claim | 1.80 | 425  | 765.00       |
|                     | S           | tatus and updates to claims registry site.                              |      |      |              |
|                     | Total Commi | nication with Creditors   | 76.3 | _    | \$ 38,557.50 |

# EXHIBIT D-10

### TELEXFREE

Services Relating to Disclosure Statement, Plan, Confirmation July 1, 2020 through July 14, 2020

| Name   | Date                           | Description  | Time | Rate   | Amount          |
|--|--------------------------------|--|------|--------|-----------------|
| Martin, Timothy                                | 7/1/2020 Attend to             | o translating issues related to Confirmation Hearing.                  | 0.60 | \$ 800 | \$<br>480.00    |
| Sorondo, Jean-Louis                            | 7/1/2020 Review                | translated versions of hearing notices.                                | 0.50 | 650    | 325.00          |
| Sorondo, Jean-Louis                            | 7/1/2020 Prepare disputed      | ballot template for voting by AF Consultores allowed and claims.       | 1.20 | 650    | 780.00          |
| Sorondo, Jean-Louis                            | 7/1/2020 Research<br>other cla | n and reconcile various ballot issues related to transferred and ims.  | 1.80 | 650    | 1,170.00        |
| Martin, Timothy                                | 7/2/2020 Attend to related n   | o questions regarding access to Plan Confirmation hearing and otice.   | 0.90 | 800    | 720.00          |
| Martin, Timothy                                | 7/2/2020 Analyze               | inquiries received from creditors regarding ballots.                   | 0.70 | 800    | 560.00          |
| Berardino, Emma                                |                                | ummary of docketed and non-docketed Objections to ation of Plan.       | 1.90 | 400    | 760.00          |
| Martin, Timothy                                | 7/6/2020 Review                | emailed and docketed objections to confirmation.                       | 0.60 | 800    | 480.00          |
| Martin, Timothy                                | 7/7/2020 Review                | summary of objection to confirmation.                                  | 0.50 | 800    | 400.00          |
| Berardino, Emma                                |                                | ummary of disputed and resolved claims ahead of Plan<br>ation Hearing. | 1.70 | 400    | 680.00          |
| Berardino, Emma                                | 7/8/2020 Attend F<br>Court.    | Plan Confirmation Hearing telephonically in the Bankruptcy             | 0.90 | 400    | 360.00          |
| Martin, Timothy                                | 7/8/2020 Assist in             | preparing claim summary for Confirmation Hearing.                      | 1.30 | 800    | 1,040.00        |
| Martin, Timothy                                | 7/8/2020 Prepare               | for and participate in Confirmation Hearing.                           | 1.10 | 800    | 880.00          |
| Martin, Timothy                                | 7/8/2020 Attend to             | o translating issues related to Confirmation Order.                    | 0.40 | 800    | 320.00          |
| Sorondo, Jean-Louis                            | 7/8/2020 Attend c              | onfirmation hearing telephonically.                                    | 0.80 | 650    | 520.00          |
| Martin, Timothy                                | 7/14/2020 Analyze form.        | instances of claimants modifying payment addresses on ballot           | 0.70 | 800    | 560.00          |
| Martin, Timothy                                | 7/14/2020 Call with            | h T. Feil (BMC) regarding balloting status.                            | 0.40 | 800    | 320.00          |
| Martin, Timothy                                | 7/14/2020 Call with            | n Trustee regarding transfers of claims.                               | 0.10 | 800    | 80.00           |
| Total Disclosure Statement, Plan, Confirmation |                                |  |      |        | \$<br>10,435.00 |

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# EXHIBIT D-11

# TELEXFREE

Services Relating to Meetings with Trustee or Counsel July 1, 2020 through July 14, 2020

| Name                                   | Date        | Description  |      | e Rate |     | Amount |        |  |
|--|-------------|--|------|--------|-----|--------|--------|--|
| Martin, Timothy                        | 7/2/2020 Ca | Il with Trustee regarding notices of Confirmation Hearing. | 0.20 | \$     | 800 | \$     | 160.00 |  |
| Martin, Timothy                        | 7/7/2020 Ca | Ill with Trustee regarding objections to confirmation.     | 0.30 |        | 800 |        | 240.00 |  |
| Total Meetings with Trustee or Counsel |             |  | 0.5  |        |     | \$     | 400.00 |  |