

the original budget provided by Young Conaway to the Debtors, and the reasons for the variation were discussed with the Debtors.

c. The professionals included in the Fourth Interim Request did not vary their hourly rate based on the geographic location of the bankruptcy case.

d. The Fourth Interim Request did not include any fees dedicated to reviewing or revising time records, or, preparing, reviewing, and revising invoices that would not normally be compensable outside of bankruptcy.

e. The time period covered by the Fourth Interim Request includes approximately 2.80 hours with a value of \$1,750.00 spent by Young Conaway to ensure that the time entries subject to the Fourth Interim Request comply with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and do not disclose privileged or confidential information. This review and any revisions associated therewith are a necessary component of Young Conaway's preparation of each monthly fee application.

f. The Fourth Interim Request reflects Young Conaway's annual rate increase, which took effect on January 1, 2019.

Dated: November 14, 2019
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

Sean M. Beach (No. 4070)

Robert F. Poppiti, Jr., (No. 5052)

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Counsel to the Debtors

EXHIBIT A**CUSTOMARY AND COMPARABLE
COMPENSATION DISCLOSURES**

Young Conaway's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. In addition, Young Conaway's hourly rates for bankruptcy services are comparable to the rates charged by the Firm, and by comparably skilled practitioners in other firms, for complex corporate and litigation matters, whether in court or otherwise, regardless of whether a fee application is required. By way of example, Young Conaway's blended hourly rates for attorneys and paraprofessionals in the Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation sections of the Firm for the prior calendar year were as set forth below. Young Conaway believes that the services performed by those three sections of the Firm are comparable to the services performed in the Bankruptcy and Corporate Restructuring section. Also included below is 2018 blended hourly rate information for all sections of the Firm, excluding the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

Category of Timekeeper	Blended Hourly Rate		
	Billed In comparable practice areas for preceding calendar year ¹	Billed Firm-wide for preceding calendar year ²	Billed This Application
Partner	\$800.00	\$667.00	\$691.28
Counsel	\$514.00	\$465.00	\$600.00
Associate	\$417.00	\$414.00	\$389.47
Paralegal	\$240.00	\$195.00	\$273.00
Aggregated:	\$542.00	\$487.00	\$503.47

¹ This column reflects the blended 2018 rates charge by the firm for complex corporate and litigation matters in the following sections of the firm: Corporate Counseling and Litigation, Business Planning and Tax, and Intellectual Property Litigation.

² This column excludes blended hourly rates for the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

EXHIBIT B**BUDGET AND STAFFING PLAN**

	BUDGETED AMOUNT			
	<u>July</u>	<u>August</u>	<u>September</u>	<u>Application Period</u>
Total Budgeted Fees/Expenses	\$305,550.00	\$358,125.00	\$411,000.00	\$1,074,675.00
	PROFESSIONAL RATES			
<u>Professional</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>Application Period</u>
Michael R. Nestor	\$905.00	\$905.00	\$905.00	\$905.00
Sean M. Beach	\$785.00	\$785.00	\$785.00	\$785.00
Matthew B. Lunn	\$745.00	\$745.00	\$745.00	\$745.00
Robert F. Poppiti, Jr.	\$625.00	\$625.00	\$625.00	\$625.00
Erin D. Edwards	\$655.00	\$655.00	\$655.00	\$655.00
Michael S. Neiburg	\$600.00	\$600.00	\$600.00	\$600.00
Travis G. Buchanan	\$530.00	\$530.00	\$530.00	\$530.00
Allison S. Mielke	\$415.00	\$415.00	\$415.00	\$415.00
Tara C. Pakrouh	\$400.00	\$400.00	\$400.00	\$400.00
Betsy L. Feldman	\$340.00	\$340.00	\$340.00	\$340.00
Beth Olivere (paralegal)	\$285.00	\$285.00	\$285.00	\$285.00
	BUDGETED HOURS			
<u>Professional</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>Application Period</u>
Michael R. Nestor	5	5	5	15
Sean M. Beach	100	125	125	350
Matthew B. Lunn	50	50	100	200
Robert F. Poppiti, Jr.	50	75	100	225
Erin D. Edwards	10	10	10	30
Michael S. Neiburg	10	10	10	30
Travis G. Buchanan	10	10	10	30
Allison S. Mielke	110	125	125	360
Tara C. Pakrouh	110	125	125	360
Betsy L. Feldman	110	125	125	360
Beth Olivere (paralegal)	25	25	25	75
TOTAL BUDGETED HOURS	590	685	760	2035
	BUDGETED FEES			
<u>Professional</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>Application Period</u>
Michael R. Nestor	\$4,525.00	\$4,525.00	\$4,525.00	\$13,575.00

Sean M. Beach	\$78,500.00	\$98,125.00	\$98,125.00	\$274,750.00
Matthew B. Lunn	\$37,250.00	\$37,250.00	\$74,500.00	\$149,000.00
Robert F. Poppiti, Jr.	\$31,250.00	\$46,875.00	\$62,500.00	\$140,625.00
Erin D. Edwards	\$6,550.00	\$6,550.00	\$6,550.00	\$19,650.00
Michael S. Neiburg	\$6,000.00	\$6,000.00	\$6,000.00	\$18,000.00
Travis G. Buchanan	\$5,300.00	\$5,300.00	\$5,300.00	\$15,900.00
Allison S. Mielke	\$45,650.00	\$51,875.00	\$51,875.00	\$149,400.00
Tara C. Pakrouh	\$44,000.00	\$50,000.00	\$50,000.00	\$144,000.00
Betsy L. Feldman	\$37,400.00	\$42,500.00	\$42,500.00	\$122,400.00
Beth Olivere (paralegal)	\$7,125.00	\$7,125.00	\$7,125.00	\$21,375.00
TOTAL BUDGETED FEES	\$303,550.00	\$356,125.00	\$409,000.00	\$1,068,675.00
	BUDGETED EXPENSES			
	<u>July</u>	<u>August</u>	<u>September</u>	<u>Application Period</u>
TOTAL BUDGETED EXPENSES	\$2,000.00	\$2,000.00	\$2,000.00	\$6,000.00

Professional	Position of the Professional; Number of Years in that Position; Year Obtaining License to Practice, if Applicable
Michael R. Nestor	Partner since 2003. Joined firm as an associate in 1998. Member of PA and NJ bars since 1995. Member of DE Bar since 1996.
Sean M. Beach	Partner since 2009. Joined firm as an associate in 2000. Member of DE bar since 2001 and NY bar since 2007.
Matthew B. Lunn	Partner since 2010. Joined firm as an associate in 2001. Member of DE bar since 2001 and NY bar since 2009.
Robert F. Poppiti, Jr.	Partner since 2018. Joined firm as an associate in 2007. Member of DE bar since 2007 and NY bar since 2015.
Erin D. Edwards	Partner since 2014. Joined firm as an associate in 2003. Member of DE bar since 2003.
Michael S. Neiburg	Partner since 2019. Joined firm as an associate in 2008. Member of DE bar since 2009 and PA bar since 2006.
Travis G. Buchanan	Joined firm as an associate in 2011. Member of DE bar since 2011.
Allison S. Mielke	Joined firm as an associate in 2017. Member of DE bar since 2013.
Tara C. Pakrouh	Joined firm as an associate in 2017. Member of DE bar since 2015.
Betsy L. Feldman	Joined firm as an associate in 2017. Member of DE bar since 2017.
Beth Olivere	Paralegal

EXHIBIT C**SUMMARY OF TIMEKEEPERS INCLUDED
IN THE FOURTH INTERIM REQUEST**

Name	Title	Department	Date of First Admission	Fees Billed in the Application Period	Hours Billed in the Application Period	Hourly Rate Billed in the Application Period
Craig D. Gear	Partner	Business and Tax	1996	\$195.00	0.20	\$975.00
John J. Paschetto	Partner	Business and Tax	1998	\$15,470.00	18.20	\$850.00
Sean M. Beach	Partner	Bankruptcy	2001	\$297,358.00	378.80	\$785.00
Matthew B. Lunn	Partner	Bankruptcy	2001	\$61,388.00	82.40	\$745.00
Kevin A. Guerke	Partner	Bankruptcy	2001	\$75,472.50	104.10	\$725.00
Erin Edwards	Partner	Bankruptcy	2003	\$103,359.00	157.80	\$655.00
Kenneth J. Enos	Partner	Bankruptcy	2004	\$41,151.00	63.80	\$645.00
Robert F. Poppiti, Jr.	Partner	Bankruptcy	2007	\$179,062.50	286.50	\$625.00
Timothy Snyder	Partner	Employment Law	1985	\$10,230.00	18.60	\$550.00
Michael S. Neiburg	Partner	Bankruptcy	2009	\$105,780.00	176.30	\$600.00
Jaime L. Chapman	Counsel	Bankruptcy	2006	\$2,160.00	3.60	\$600.00
Ian J. Bambrick	Associate	Bankruptcy	2010	\$1,253.50	2.30	\$545.00
Justin P. Duda	Associate	Business and Tax	2010	\$436.00	0.80	\$545.00
Travis G. Buchanan	Associate	Bankruptcy	2011	\$81,355.00	153.50	\$530.00
Pilar G. Kraman	Associate	Business and Tax	2008	\$265.00	0.50	\$530.00
Joseph M. Mulvihill	Associate	Bankruptcy	2015	\$52,440.00	114.00	\$460.00
Shane M. Reil	Associate	Bankruptcy	2015	\$4,738.00	10.30	\$460.00
Allison S. Mielke	Associate	Bankruptcy	2013	\$153,840.50	370.70	\$415.00

Tara C. Pakrouh	Associate	Bankruptcy	2015	\$105,560.00	263.90	\$400.00
Betsy L. Feldman	Associate	Bankruptcy	2017	\$154,360.00	454.00	\$340.00
Brittani Gordon	Associate	Bankruptcy	-	\$12,784.00	37.60	\$340.00
Jared W. Kochenash	Associate	Bankruptcy	2018	\$1,332.50	4.10	\$325.00
Catherine C. Lyons	Associate	Bankruptcy	-	\$27,787.50	85.50	\$325.00
Matthew Milana	Associate	Bankruptcy	-	\$26,195.00	80.60	\$325.00
Jacob D. Morton	Associate	Bankruptcy	-	\$24,732.50	76.10	\$325.00
Malak S. Doss	Law Clerk	Bankruptcy	-	\$14,755.00	45.40	\$325.00
Andrew Kim	Summer Associate	Bankruptcy	-	\$242.00	1.10	\$220.00
Titus Kabega	Summer Associate	Bankruptcy	-	\$2,772.00	12.60	\$220.00
Brenda Walters	Paralegal	Bankruptcy	-	\$4,248.00	14.40	\$295.00
Debbie Laskin	Paralegal	Bankruptcy	-	\$2,360.00	8.00	\$295.00
Beth Olivere	Paralegal	Bankruptcy	-	\$40,755.00	143.00	\$285.00
Troy Bollman	Paralegal	Bankruptcy	-	\$484.50	1.70	\$285.00
Chad A. Corazza	Paralegal	Bankruptcy		\$399.00	1.40	\$285.00
Melissa Romano	Paralegal	Bankruptcy		\$342.00	1.20	\$285.00
Monica Fratticci	Paralegal	Litigation Support	-	\$3,132.50	17.90	\$175.00
Patrick M. Foss	Paralegal	Litigation Support	-	\$759.00	4.60	\$165.00
Karen Luongo	Paralegal	Corporate	-	\$100.00	0.40	\$250.00
TOTAL				\$1,609,054.50	3195.90	

EXHIBIT D**SUMMARY OF COMPENSATION AND EXPENSE REIMBURSEMENT**

SUMMARY OF COMPENSATION BY PROJECT CATEGORY			
Project Category		Hours Billed	Fees Sought
B001	Case Administration	51.20	\$17,461.50
B002	Court Hearings	34.40	\$13,636.00
B003	Cash Collateral/DIP Financing	1.00	\$785.00
B004	Schedules & Statements, U.S. Trustee Reports	8.00	\$3,326.00
B005	Lease/Executory Contract Issues	48.30	\$24,788.00
B006	Use, Sale or Lease of Property (363 issues)	319.70	\$174,784.00
B007	Claims Analysis, Objections and Resolutions	637.40	\$304,013.50
B008	Meetings	118.90	\$73,339.50
B009	Stay Relief Matters	31.60	\$17,667.00
B011	Other Adversary Proceedings	829.90	\$400,969.00
B012	Plan and Disclosure Statement	216.90	\$130,150.00
B013	Creditor Inquiries	2.10	\$1,204.50
B014	General Corporate Matters	15.90	\$11,196.50
B015	Employee Matters	30.90	\$17,776.00
B016	Asset Analysis	1.70	\$687.50
B017	Retention of Professionals/Fee Issues	16.20	\$5,903.50
B018	Fee Application Preparation	20.30	\$7,470.50
B019	Travel	16.60	\$12,461.00
B190	Other Contested Matters	184.90	\$77,056.50
B768	Williams Litigation	610.00	\$314,379.00
	Total	3195.90	\$1,609,054.50

SUMMARY OF EXPENSE REIMBURSEMENT BY CATEGORY	
Category	Amount
Air/Rail Travel	\$2,829.22
Car/Bus/Subway Travel	\$927.99
Computerized Legal Research	\$6,332.34
Court Reporter	\$673.75
Delivery / Courier	\$287.50
Docket Retrieval/Search	\$665.36
Expert Fee	\$7,420.00
Federal Express	\$231.89
Filing Fee	\$56.00
Hotel/Lodging	\$1,450.78
Miscellaneous	\$650.00
Parking	\$103.24
Postage	\$1.15
Reproduction Charges	\$2,340.90
Service fee	\$51.68
Secretary of State	\$14.00
Teleconference/Video Conference	\$896.97
Working Meals	\$1,145.96
TOTAL	\$26,078.73

EXHIBIT E

SUMMARY OF FOURTH INTERIM APPLICATION	
Name of Applicant	Young Conaway Stargatt & Taylor, LLP
Name of Client	Debtors
Time period covered by Fourth Interim Application	July 1, 2019 through September 30, 2019
Total compensation sought during the Application Period	\$1,609,054.50
Total expenses sought during the Application Period	\$26,078.73
Petition Date	October 22, 2018
Retention Date	October 22, 2018
Date of order approving employment	November 15, 2018
Total compensation approved by interim order to date	\$3,949,092.50
Total expenses approved by interim order to date	\$59,996.01
Total allowed compensation paid to date	\$3,949,092.50
Total allowed expenses paid to date	\$59,996.01
Blended rate in the Fourth Interim Application for all attorneys	\$519.62
Blended rate in the Fourth Interim Application for all timekeepers	\$503.47
Compensation sought in the Fourth Interim Application already paid pursuant to a monthly compensation order but not yet allowed	\$1,287,243.60
Expenses sought in the Fourth Interim Application already paid pursuant to a monthly compensation order but not yet allowed	\$26,078.73
Number of professionals included in the Fourth Interim Application	37
If applicable, number of professionals in the Fourth Interim Application not included in staffing plan approved by client	27
If applicable, difference between fees budgeted and compensation sought during the Application Period	Amt. Budgeted: \$1,068,675.00 Amt. Sought: \$1,609,054.20
Number of professionals billing fewer than 15 hours to the case during the Application Period	14
Are any rates higher than those approved or disclosed at retention?	No