

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE DISTRICT OF DELAWARE**

)	
In re:)	Chapter 11
LIGADO NETWORKS LLC, <i>et al.</i> , ¹)	Case No. 25-10006 (TMH)
Debtors.)	(Jointly Administered)
)	
)	<u>Objection Deadline:</u>
)	March 24, 2025, at 4:00 p.m. (ET)

**FIRST MONTHLY FEE APPLICATION OF
 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP FOR
 ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
 AND REIMBURSEMENT OF EXPENSES AS SPECIAL LITIGATION
 COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION
 FOR THE PERIOD FROM JANUARY 5, 2025 THROUGH JANUARY 31, 2025**

Name of Applicant:	<u>Paul, Weiss, Rifkind, Wharton & Garrison LLP</u>
Authorized to Provide Professional Services to:	<u>Debtors and Debtors in Possession</u>
Date of Retention:	<u>February 20, 2025 [D.I. 254]</u> (Effective as of January 5, 2025)
Period for Which Compensation and Reimbursement is Sought:	<u>January 5, 2025 through January 31, 2025</u>
Amount of Compensation sought as actual, reasonable and necessary	<u>\$121,865.86 (80% of \$152,332.32)</u>
Amount of Expense Reimbursement sought as actual, reasonable and necessary	<u>\$0</u>

This is a(n): X monthly ___interim___ final application.
 Prior Applications: None.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Ligado Networks LLC (3801); ATC Technologies, LLC (N/A); Ligado Networks (Canada) Inc. (N/A); Ligado Networks Build LLC (N/A); Ligado Networks Corp. (N/A); Ligado Networks Finance LLC (N/A); Ligado Networks Holdings (Canada) Inc. (N/A); Ligado Networks Inc. of Virginia (9725); Ligado Networks Subsidiary LLC (N/A); One Dot Six LLC (8763); and One Dot Six TVCC LLC (N/A). The Debtors’ headquarters is located at: 10802 Parkridge Boulevard, Reston, Virginia 20191

MONTHLY COMPENSATION BY PROFESSIONAL

Name of Professional	Position and Year of Admission	Hourly Billing Rate	Total Billed Hours	Total Compensation²
Martin Flumenbaum	Of Counsel (Litigation); admitted NY 1975	\$2,595.00	9.10	\$23,614.50
Harris Fischman	Partner (Litigation); admitted NY 2006	\$2,445.00	10.80	\$26,406.00
Jacob Adlerstein	Partner (Bankruptcy); admitted NY 2008	\$2,595.00	4.00	\$10,380.00
Carter E. Greenbaum	Associate (Litigation); admitted NY 2017	\$1,695.00	14.90	\$25,255.50
Grant May	Associate (Litigation); admitted NY 2017	\$1,695.00	5.50	\$9,322.50
Alice Nofzinger	Associate (Bankruptcy); admitted NY 2017	\$1,695.00	20.30	\$34,408.50
Max Siegel	Associate (Litigation); admitted NY 2019	\$1,695.00	3.80	\$6,441.00
Emily Sasso	Associate (Litigation); admitted NY 2021	\$1,675.00	3.20	\$5,360.00
Bruce C. Racine	Associate (Bankruptcy); admitted NY 2021	\$1,595.00	9.20	\$14,674.00
Jonathan Jaroslawicz	Associate (Litigation); admitted NY 2022	\$1,675.00	8.20	\$13,735.00
Casey Sandalow	Associate (Litigation); admitted NY 2025	\$1,220.00	7.00	\$8,540.00
Zoe Basulto	Paralegal	\$490.00	0.10	\$49.00
Beth Lewitzky	Paralegal	\$460.00	0.90	\$414.00
Michael Johnson	Paralegal	\$525.00	0.20	\$105.00
Jae Han	Paralegal	\$375.00	0.50	\$187.50
Stephen LaFalce	Paralegal	\$460.00	0.70	\$322.00
Total:			98.40	\$179,214.50
Blended Rate:		\$1,816.59		
Attorney Total:			96.00	\$178,137.00
Attorney Blended Rate:		\$1,849.48		

² As described in the Debtors' Application for an Order Authorizing the Retention and Employment of Paul, Weiss, Rifkind, Wharton & Garrison LLP as Special Litigation Counsel for the Debtors and Debtors in Possession as of the Petition Date [D.I. 184] (the "Retention Application"), Paul, Weiss agreed to defer payment of certain Deferred Fees (as defined in the Retention Application), including 15% of its total fees incurred during the First Monthly Fee Period.

COMPENSATION BY PROJECT CATEGORY

<u>Project Category</u>	<u>Total Hours</u>	<u>Total Fees</u>
Litigation	58.20	\$108,476.00
Retention and Fee Applications	40.20	\$70,738.50
Totals	98.40	\$179,214.50

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Debtors.)	(Jointly Administered)
)	
)	<u>Objection Deadline:</u>
)	March 24, 2025, at 4:00 p.m. (ET)

**FIRST MONTHLY FEE APPLICATION OF
 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP FOR
 ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
 AND REIMBURSEMENT OF EXPENSES AS SPECIAL LITIGATION
 COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION
 FOR THE PERIOD FROM JANUARY 5, 2025 THROUGH JANUARY 31, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and in accordance with that certain *Order Authorizing the Retention and Employment of Paul, Weiss, Rifkind, Wharton & Garrison LLP as Special Litigation Counsel for the Debtors and Debtors in Possession as of the Petition Date* [D.I. 254] (the “Retention Order”) and that certain *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 195], the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”) hereby submits this first monthly fee application (the “Application”), seeking compensation for services rendered and reimbursement

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Ligado Networks LLC (3801); ATC Technologies, LLC (N/A); Ligado Networks (Canada) Inc. (N/A); Ligado Networks Build LLC (N/A); Ligado Networks Corp. (N/A); Ligado Networks Finance LLC (N/A); Ligado Networks Holdings (Canada) Inc. (N/A); Ligado Networks Inc. of Virginia (9725); Ligado Networks Subsidiary LLC (N/A); One Dot Six LLC (8763); and One Dot Six TVCC LLC (N/A). The Debtors’ headquarters is located at: 10802 Parkridge Boulevard, Reston, Virginia 20191.

of expenses incurred as special litigation counsel to the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for the period commencing January 5, 2025 through and including January 31, 2025 (the “First Monthly Fee Period”). By this Application, Paul, Weiss seeks payment in the amount of \$121,865.86, representing eighty percent (80%) of the total amount of compensation (\$152,332.32), sought for actual and necessary services billed during the First Monthly Fee Period, excluding all Deferred Fees (as defined below). In support of its Application, Paul, Weiss respectfully represents as follows:

BACKGROUND

1. On January 5, 2025 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are authorized to operate their business and manage their properties as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

2. On February 4, 2025, the Debtors filed the Debtors’ Application for an Order Authorizing the Retention and Employment of Paul, Weiss, Rifkind, Wharton & Garrison LLP as Special Litigation Counsel for the Debtors and Debtors in Possession as of the Petition Date [D.I. 184] (the “Retention Application”). Pursuant to the Retention Order, Paul, Weiss was retained as special litigation counsel to the Debtors in these chapter 11 cases effective as of the Petition Date. The Retention Order authorized Paul, Weiss to be compensated on an hourly basis and to be reimbursed for certain actual and necessary out-of-pocket expenses.

3. All services for which compensation is requested by Paul, Weiss were performed for or on behalf of the Debtors.

SERVICES RENDERED

4. Attached hereto as **Exhibit A** is a detailed statement of fees incurred during the First Monthly Fee Period reflecting total fees of \$152,332.32, which amount excludes all Deferred

Fees (as defined in the Retention Application). As described in the Retention Application, Paul, Weiss agreed to defer payment of certain Deferred Fees, including 15% of its total fees incurred during the First Monthly Fee Period.

5. The services rendered by Paul, Weiss during the First Monthly Fee Period are grouped into the categories set forth in Exhibit A. The attorneys and paralegals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in the attachments hereto.

EXPENSE REIMBURSEMENT

6. Paul, Weiss is not seeking reimbursement of any out-of-pocket costs or expenses pursuant to this Application.

VALUATION OF SERVICES

7. Attorneys and paraprofessionals of Paul, Weiss have expended a total of 98.40 hours in connection with this matter during the First Monthly Fee Period.

8. The amount of time spent by each of these persons providing services to the Debtors for the First Monthly Fee Period is fully set forth in the detail attached hereto as Exhibit A. Excluding Deferred Fees, the reasonable value of the services rendered by Paul, Weiss for the First Monthly Fee Period as counsel for the Debtors in these cases is \$152,332.32.

9. Paul, Weiss believes that the time entries included in Exhibit A attached hereto is in compliance with the requirements of Local Rule 2016-2.

10. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under chapter 11 of the Bankruptcy Code.

11. This Application covers the First Monthly Fee Period. Paul, Weiss has performed, and will continue to perform, additional necessary services subsequent to the First Monthly Fee Period, for which Paul, Weiss will file subsequent fee applications.

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CONCLUSION

WHEREFORE, Paul, Weiss hereby requests that the Court: (a) allow Paul, Weiss’s fees for actual and necessary services rendered during the First Monthly Fee Period in the amount of \$152,332.32; (b) authorize and direct the Debtors to pay Paul, Weiss \$121,865.86 (representing 80% of the total fees (\$152,332.32) billed); and (c) grant such other and further relief as the Court deems just and proper.

Dated: March 4, 2025

Respectfully submitted,

/s/ Harris Fischman

Harris Fischman (admitted pro hac vice)
Jacob A. Adlerstein (admitted pro hac vice)
Alice Nofzinger (admitted pro hac vice)
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jadlerstein@paulweiss.com
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*Special Litigation Counsel for the Debtors and
Debtors in Possession*

VERIFICATION

I, HARRIS FISCHMAN, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury:

1. I am a Partner in the applicant firm, Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”), and have been admitted to the bar of the Supreme Court of New York since 2006.

2. I have personally performed many of the legal services rendered by Paul, Weiss, as special litigation counsel to the Debtors in connection with or otherwise related to the USG Litigation (as defined in the Retention Application) and am familiar with all other work performed by the lawyers and paraprofessionals at Paul, Weiss.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

Dated: March 4, 2025

/s/ Harris Fischman

HARRIS FISCHMAN

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)	Chapter 11
LIGADO NETWORKS LLC, <i>et al.</i> , ¹)	Case No. 25-10006 (TMH)
)	
Debtors.)	(Jointly Administered)
)	
)	Objection Deadline: March 24, 2025 at 4:00 p.m. (ET)

NOTICE OF FEE APPLICATION

PLEASE TAKE NOTICE that Paul, Weiss, Rifkind, Wharton & Garrison LLP (the “Applicant”) has today filed the attached *First Monthly Fee Application of Paul, Weiss, Rifkind, Wharton & Garrison LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses as Special Litigation Counsel for the Debtors and Debtors in Possession for the Period from January 5, 2025 through January 31, 2025* (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that objections to the Application, if any, must be made in accordance with the *Order Establishing Procedures for Compensation and Reimbursement of Professionals*, dated February 7, 2025 [Docket No. 195] (the “Interim Compensation Order”) and must be filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 no later than **4:00 p.m. (prevailing Eastern Time) on March 24, 2025** (the “Objection Deadline”) and served upon: (i) counsel to the Debtors, (a) Milbank LLP, (x) 55 Hudson Yards, New York, NY 10001, Attn: Dennis F. Dunne (ddunne@milbank.com),

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Ligado Networks LLC (3801); ATC Technologies, LLC (N/A); Ligado Networks (Canada) Inc. (N/A); Ligado Networks Build LLC (N/A); Ligado Networks Corp. (N/A); Ligado Networks Finance LLC (N/A); Ligado Networks Holdings (Canada) Inc. (N/A); Ligado Networks Inc. of Virginia (9725); Ligado Networks Subsidiary LLC (N/A); One Dot Six LLC (8763); and One Dot Six TVCC LLC (N/A). The Debtors’ headquarters is located at: 10802 Parkridge Boulevard, Reston, Virginia 20191.

Matthew L. Brod (mbrod@milbank.com), and Lauren C. Doyle (ldoyle@milbank.com), and (y) 1850 K Street, NW, Suite 1100, Washington, DC 20006, Attn: Andrew M. Leblanc (aleblanc@milbank.com), and (b) Richards, Layton & Finger, PA, 920 North King Street, Wilmington, DE 19801, Attn: Mark Collins (collins@rlf.com), Michael J. Merchant (merchant@rlf.com), and Amanda R. Steele (steele@rlf.com); (ii) the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") , 844 King Street, Suite 2207, Wilmington, DE 19801 (Attn: Benjamin Hackman (Benjamin.A.Hackman@usdoj.gov)); (iii) counsel for the Ad Hoc Cross-Holder Group, (a) Kirkland and Ellis, LLP, 601 Lexington Avenue, New York, New York 10022 (Attn: Brian Schartz (brian.schartz@kirkland.com) and Derek Hunter (derek.hunter@kirkland.com)) and (b) Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, Delaware 19801, Attn: Seth Van Aalten (svanaalten@coleschotz.com), Justin R. Alberto (jalberto@coleschotz.com), and Stacy L. Newman (snewman@coleschotz.com); and (iv) counsel for Ad Hoc First Lien Group, Sidley Austin LLP, One South Dearborn, Chicago, Illinois 60603 (Attn: Stephen E. Hessler (shessler@sidley.com), Jason Hufendick (jhufendick@sidley.com), and Dennis M. Twomey (dtwomey@sidley.com)).

PLEASE TAKE FURTHER NOTICE that if no objections to the Application are filed prior to the Objection Deadline, the Applicant may file a certificate of no objection with the Court, after which the Debtors shall be authorized by the Interim Compensation Order to pay the Applicant an amount equal to 80% of the fees and 100% of the expenses requested in the Application without the need for further order of the Court.

PLEASE TAKE FURTHER NOTICE that if an objection to the Application is filed prior to the Objection Deadline, the Debtors shall be authorized by the Interim Compensation

Order to pay the Applicant 80% of the fees and 100% of the expenses requested in the Application not subject to such objection without the need for further order of the Court.

Dated March 4, 2025
Wilmington, Delaware

/s/ Emily R. Mathews

Mark D. Collins, Esq. (Bar No. 2981)
Michael J. Merchant, Esq. (Bar No. 3854)
Amanda R. Steele, Esq. (Bar No. 5530)
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-and-

Dennis F. Dunne, Esq. (admitted *pro hac vice*)
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Co-Counsel for Debtors in Possession

Exhibit A

Fees

TIME DETAIL

Name	Dept	Title	Date	Task	Description	Hours
Fischman, Harris	Lit	Partner	01/05/25	FEEAPP	Review, revise draft pleadings.	1.00
Nofzinger, Alice	Rstr	Associate	01/06/25	FEEAPP	Correspond with PW, Milbank teams re chapter 11 filing, PW retention application (.3); review, analyze engagement letter, first day declaration, RSA re PW retention application (.7).	1.00
Nofzinger, Alice	Rstr	Associate	01/07/25	FEEAPP	Correspond with Milbank re retention application, parties in interest list (.2); review, analyze same (.2); correspond with PW team re same, next steps (.4); conference with J. Adlerstein re retention application (.1); correspond with J. Adlerstein re same (.2); research, review precedent re same (1.2).	2.30
Nofzinger, Alice	Rstr	Associate	01/08/25	FEEAPP	Correspond with PW team re 327e requirements, retention application (.3); prepare same (.2); telephone conference with T. Peretz re same (.1).	0.60
Greenbaum, Carter E.	Lit	Associate	01/08/25	FEEAPP	Review, revise draft interrogatories.	1.80
Adlerstein, Jacob	Rstr	Partner	01/08/25	FEEAPP	Review, analyze retention application, proposed order, and related declarations (.3); correspond with PW team re retention application comments and next steps (.2).	0.50
Adlerstein, Jacob	Rstr	Partner	01/10/25	FEEAPP	Correspond with PW team re retention application, proposed order, and related declarations (.1); review and comment re same (.4).	0.50

Name	Dept	Title	Date	Task	Description	Hours
Nofzinger, Alice	Rstr	Associate	01/10/25	FEEAPP	Draft retention application, proposed order, related declarations (4.3); review, analyze precedent, local rules, guidelines re same (.8); correspond with PW team re same (.3).	5.40
Nofzinger, Alice	Rstr	Associate	01/11/25	FEEAPP	Correspond with PW, Milbank re retention application.	0.10
Adlerstein, Jacob	Rstr	Partner	01/12/25	FEEAPP	Correspond with PW team re retention application, proposed order, and related declarations (.2); review and comment re same (.8).	1.00
Nofzinger, Alice	Rstr	Associate	01/12/25	FEEAPP	Correspond with PW, Milbank re retention application (.1); review, analyze comments re same (.1).	0.20
Fischman, Harris	Lit	Partner	01/13/25	FEEAPP	Review, analyze retention application and related materials (1.5); emails with J. Adlerstein and A. Nofzinger re retention materials (.5).	2.00
Nofzinger, Alice	Rstr	Associate	01/13/25	FEEAPP	Review, analyze comments re retention application, declaration (.3); review, revise same, disclosure schedule (2.5); correspond with PW team re same (.5); review, analyze materials re same (1.0); correspond with Milbank re same, next steps (.2).	4.50
Adlerstein, Jacob	Rstr	Partner	01/13/25	FEEAPP	Review and comment on retention application, proposed order, and related declarations (1.2); correspond with PW team re same (.3).	1.50
Nofzinger, Alice	Rstr	Associate	01/14/25	FEEAPP	Correspond with PW team re retention application, finalization of same (.3); prepare same (.3); telephone conference with Milbank re same, filing (.1); correspond with Milbank re same, updates (.2).	0.90
Nofzinger, Alice	Rstr	Associate	01/15/25	FEEAPP	Conference with B. Racine re retention application, disclosure schedule, next steps (.5); correspond with PW team re same (.2); correspond with Milbank re same (.2); review, analyze revised parties in interest list (.1).	1.00
Racine, Bruce	Rstr	Associate	01/15/25	FEEAPP	Conference with A. Nofzinger re retention application, disclosure schedule, and next steps (.5); correspond with A. Platek re conflicts reports (.1); review, analyze parties in interest list (.1).	0.70
Racine, Bruce	Rstr	Associate	01/16/25	FEEAPP	Review, comment on retention application disclosure schedule (3.1); review, analyze parties in interest list (.1); review, analyze disclosure schedules and conflicts reports (.8); conference with A. Nofzinger re disclosure schedule (.1).	4.10
Nofzinger, Alice	Rstr	Associate	01/16/25	FEEAPP	Conference with B. Racine re disclosure schedule (.1); correspond with A. Platek re same (.1).	0.20

Name	Dept	Title	Date	Task	Description	Hours
Racine, Bruce	Rstr	Associate	01/17/25	FEEAPP	Review, comment on retention application disclosure schedule (.9); review, analyze parties in interest list (.2); review, analyze disclosure schedules and conflicts reports (.2); correspond with A. Nofzinger re retention application disclosure schedule (.1); correspond with J. Adlerstein re retention application disclosure schedule (.1).	1.50
Nofzinger, Alice	Rstr	Associate	01/17/25	FEEAPP	Correspond with Milbank re retention application (.1); review, comment on draft disclosure schedule for Fishman declaration (.4); correspond with PW team re same (.2); review, analyze OCP motion (.1).	0.80
Basulto, Zoe	Lit	Paralegal	01/17/25	FEEAPP	Review, analyze newly filed pleadings.	0.10
Nofzinger, Alice	Rstr	Associate	01/21/25	FEEAPP	Telephone conference with Milbank re retention application, updates (.1); correspond with Milbank re same (.1); correspond with PW team re same (.1).	0.30
Lewitzky, Beth	Oth	Paragl	01/21/25	FEEAPP	Research precedent scheduling orders.	0.90
Nofzinger, Alice	Rstr	Associate	01/22/25	FEEAPP	Correspond with Milbank re retention application, next steps.	0.10
Racine, Bruce	Rstr	Associate	01/23/25	FEEAPP	Correspond with A. Nofzinger re retention application and disclosure schedule (.2); correspond with PW team re time entries (.1).	0.30
Nofzinger, Alice	Rstr	Associate	01/23/25	FEEAPP	Review, analyze interim comp order (.1); correspond with PW team re same, retention application updates (.1).	0.20
Nofzinger, Alice	Rstr	Associate	01/24/25	FEEAPP	Correspond with Milbank re retention application comments.	0.10
Nofzinger, Alice	Rstr	Associate	01/27/25	FEEAPP	Telephone conferences with Milbank re comments to retention application (.4); review, analyze same (.2); correspond with Milbank re same (.2); telephone conference with B. Racine re same (.1); conference with H. Fischman, J. Adlerstein, B. Racine re same, next steps (.2); review, revise retention application, declaration (.3); review, analyze precedent re same (.2); correspond with PW team re same (.2).	1.80
Adlerstein, Jacob	Rstr	Partner	01/27/25	FEEAPP	Conference with PW team re retention app (.2); emails with team re same (.3).	0.50
Racine, Bruce	Rstr	Associate	01/27/25	FEEAPP	Telephone conference with A. Nofzinger re comments to retention application (.1); conference with H. Fischman, J. Adlerstein, A. Nofzinger re same, next steps (.2); telephone conferences with Milbank re same (.4).	0.70
Racine, Bruce	Rstr	Associate	01/28/25	FEEAPP	Telephone conference with A. Nofzinger re comments to retention application (.1); telephone conferences with Milbank re same (.2).	0.30

Name	Dept	Title	Date	Task	Description	Hours
Nofzinger, Alice	Rstr	Associate	01/28/25	FEEAPP	Telephone conferences with B. Racine re retention application updates (.1); correspond with PW team re same (.2).	0.30
Racine, Bruce	Rstr	Associate	01/29/25	FEEAPP	Conference with Milbank re retention application (.2); review, analyze same (.4); correspond with A. Nofzinger re: same (.3).	0.90
Nofzinger, Alice	Rstr	Associate	01/29/25	FEEAPP	Correspond with Milbank re retention application filing updates.	0.10
Nofzinger, Alice	Rstr	Associate	01/30/25	FEEAPP	Correspond with B. Racine re retention application updates (.1); conference with B. Racine re same (.1).	0.20
LaFalce, Stephen	Oth	Paragl	01/30/25	FEEAPP	Conduct legal research per G. May request.	0.70
Johnson, Michael	Oth	Paragl	01/30/25	FEEAPP	Coordinate fileshare.	0.20
Racine, Bruce	Rstr	Associate	01/30/25	FEEAPP	Conference with Milbank re retention application filing (.2); conference with A. Nofzinger re same (.1).	0.30
Racine, Bruce	Rstr	Associate	01/31/25	FEEAPP	Telephone conference with Milbank re retention application filing (.2); correspond with A. Nofzinger re same (.1); correspond with A. Nofzinger re revised PII List (.1).	0.40
Nofzinger, Alice	Rstr	Associate	01/31/25	FEEAPP	Correspond with Milbank re retention application filing updates (.1); correspond with B. Racine re revised parties in interest list (.1).	0.20
Sandalow, Casey	Lit	Associate	01/06/25	LIT	Revise litigation timeline based on scheduling order.	0.30
Sandalow, Casey	Lit	Associate	01/07/25	LIT	Review, propose redactions on filing (1.3); correspond with PW team re same (.3).	1.60
Jaroslavicz, Jonathan	Lit	Associate	01/07/25	LIT	Review, revise document requests.	1.20
Greenbaum, Carter E.	Lit	Associate	01/07/25	LIT	Review, comment on pleading redactions.	0.50
Jaroslavicz, Jonathan	Lit	Associate	01/08/25	LIT	Review, revise document requests.	1.50
Flumenbaum, Martin	Lit	Of Counsel	01/08/25	LIT	Correspond with PW team re case strategy and next steps.	0.20
Greenbaum, Carter E.	Lit	Associate	01/09/25	LIT	Review, comment on draft interrogatories.	0.60
Sandalow, Casey	Lit	Associate	01/09/25	LIT	Review, draft RFP definitions.	1.10
Jaroslavicz, Jonathan	Lit	Associate	01/09/25	LIT	Review, revise document requests.	3.80

Name	Dept	Title	Date	Task	Description	Hours
Jaroslawicz, Jonathan	Lit	Associate	01/10/25	LIT	Review, revise document requests.	1.10
Sasso, Emily G	Lit	Associate	01/10/25	LIT	Review, revise Requests for Production.	1.50
Fischman, Harris	Lit	Partner	01/14/25	LIT	Review and revise draft discovery requests.	1.00
Greenbaum, Carter E.	Lit	Associate	01/14/25	LIT	Review, revise RFPs.	2.60
Greenbaum, Carter E.	Lit	Associate	01/15/25	LIT	Emails with PW team re chapter 11 filing, litigation updates.	0.30
Flumenbaum, Martin	Lit	Of Counsel	01/15/25	LIT	Emails with H. Fischman re case issues (.4); conference call with opposing counsel and client re valuation issue (.4); review, analyze case strategy (.1).	0.90
Sandalow, Casey	Lit	Associate	01/15/25	LIT	Review, analyze litigation docket and alerts.	0.30
Sandalow, Casey	Lit	Associate	01/16/25	LIT	Research case law re procedural issues.	0.90
Greenbaum, Carter E.	Lit	Associate	01/16/25	LIT	Review, revise witness interview memo (2.0); research re interlocutory appeals (1.0).	3.00
Flumenbaum, Martin	Lit	Of Counsel	01/16/25	LIT	Review, analyze emails re government motion (.3); email with H. Fischman re same (.1); review, analyze case strategy re government motion (.3); review, analyze emails re bankruptcy issues (.1).	0.80
Fischman, Harris	Lit	Partner	01/17/25	LIT	Review, comment on draft discovery requests.	1.00
Flumenbaum, Martin	Lit	Of Counsel	01/17/25	LIT	Review, analyze government motion (.5); correspond with PW team re same (.1).	0.60
Greenbaum, Carter E.	Lit	Associate	01/21/25	LIT	Review, revise RFPs, interrogatories.	1.60
Jaroslawicz, Jonathan	Lit	Associate	01/21/25	LIT	Revise RFPs.	0.60
Flumenbaum, Martin	Lit	Of Counsel	01/21/25	LIT	Review, analyze emails re updates (.2); review, analyze case strategy (.1)	0.30
Sasso, Emily G	Lit	Associate	01/21/25	LIT	Review, revise memo re witness interview.	0.20
Siegel, Max	Lit	Associate	01/22/25	LIT	Revise draft opposition to motion for leave to appeal.	2.70

Name	Dept	Title	Date	Task	Description	Hours
Sasso, Emily G	Lit	Associate	01/22/25	LIT	Review, revise memo re witness interview.	0.60
Sandalow, Casey	Lit	Associate	01/22/25	LIT	Research case law re discovery schedule (1.6); draft proposed discovery schedule (.9).	2.50
Fischman, Harris	Lit	Partner	01/22/25	LIT	Review, revise draft opposition to motion for certification and stay (1.7); conference with client, opposing counsel re case matters (.4); emails with PW team, client re same (.4).	2.50
Flumenbaum, Martin	Lit	Of Counsel	01/22/25	LIT	Review, analyze emails re updates (.2); conference call with client and opposing counsel re same (.4); review, analyze strategy (.1); review, analyze, comment on draft brief (.9).	1.60
Flumenbaum, Martin	Lit	Of Counsel	01/23/25	LIT	Correspond with PW team re case strategy and open issues (.2); correspond with H. Fischman re same (.1); review, analyze Selendy Gay edits to brief (.3); review, analyze, comment on brief (.3); review, analyze discovery issues (.2); review, analyze witness interview memo (.5).	1.60
Sandalow, Casey	Lit	Associate	01/23/25	LIT	Correspond with PW team regarding proposed discovery schedule.	0.30
Sasso, Emily G	Lit	Associate	01/23/25	LIT	Call with C. Greenbaum and Selendy team re pre-discovery issues.	0.30
Siegel, Max	Lit	Associate	01/23/25	LIT	Revise opposition to leave to appeal.	1.10
Greenbaum, Carter E.	Lit	Associate	01/23/25	LIT	Review, comment on draft opposition to motion to certify (1.4); emails with PW team re discovery matters (.2); call with Selendy re same (.3).	1.90
Fischman, Harris	Lit	Partner	01/23/25	LIT	Review, comment on revised draft opposition to motion for certification and stay.	1.00
Flumenbaum, Martin	Lit	Of Counsel	01/24/25	LIT	Correspond with PW team re draft brief (.2); review, analyze draft brief (.2).	0.20
Fischman, Harris	Lit	Partner	01/25/25	LIT	Review, revise draft brief in opposition to motion for interlocutory appeal.	1.80

Name	Dept	Title	Date	Task	Description	Hours
Flumenbaum, Martin	Lit	Of Counsel	01/27/25	LIT	Correspond with PW team re revised brief (.2); review, analyze revised brief (.4).	0.60
Greenbaum, Carter E.	Lit	Associate	01/27/25	LIT	Review, analyze emails re case updates.	0.10
Sasso, Emily G	Lit	Associate	01/28/25	LIT	Call with M. Flumenbaum, H. Fischman, C. Greenbaum re pre-discovery issues.	0.40
Flumenbaum, Martin	Lit	Of Counsel	01/28/25	LIT	Correspond with PW team re case status (.2); conference call with H. Fischman, E. Sasso and C. Greenbaum re case status and next steps (.4); review, analyze case strategy (.2).	0.80
Fischman, Harris	Lit	Partner	01/28/25	LIT	Review, comment on draft brief in opposition to motion for interlocutory appeal.	0.50
Greenbaum, Carter E.	Lit	Associate	01/28/25	LIT	Call with PW team re case status, next steps (.4); emails with PW team re same (.1).	0.50
Greenbaum, Carter E.	Lit	Associate	01/29/25	LIT	Draft case memo (.1).	0.10
Flumenbaum, Martin	Lit	Of Counsel	01/29/25	LIT	Review, comment on interlocutory appeal brief (.3); call with client re same (.3); review, analyze emails re case updates (.2).	0.80
Flumenbaum, Martin	Lit	Of Counsel	01/30/25	LIT	Review, analyze interlocutory appeal brief (.4); review, analyze emails re case updates (.3).	0.70
May, Grant	Lit	Associate	01/30/25	LIT	Review, analyze case memo, related materials (2.1); review, analyze discovery matters (1.2).	3.30
Greenbaum, Carter E.	Lit	Associate	01/30/25	LIT	Draft, revise case memo.	1.90
Sasso, Emily G	Lit	Associate	01/30/25	LIT	Coordinate filing of response to motion to certify interlocutory appeal.	0.20
Han, Jae	Othr	Paragl	01/30/25	LIT	Coordinate filing of opposition to motion to certify interlocutory appeal.	0.50
May, Grant	Lit	Associate	01/31/25	LIT	Review, analyze case materials (1.5); review, analyze discovery plan (.5); emails with team re same, next steps (.2).	2.20

TOTAL

98.40