

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

	:	
In re	:	Chapter 11
	:	
DBMP LLC, <sup>1</sup>	:	Case No. 20-30080 (JCW)
	:	
Debtor.	:	
	:	

**SUMMARY OF FIFTH INTERIM APPLICATION OF BATES WHITE LLC FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED  
AND FOR REIMBURSEMENT OF EXPENSES AS ASBESTOS CONSULTANTS TO  
THE DEBTOR FOR THE PERIOD FROM  
MAY 1, 2021 THROUGH AUGUST 31, 2021**

Name of Applicant:	Bates White, LLC
Authorized to Provide Professional Services to:	The above-captioned Debtor
Date of Order Approving Retention:	January 24, 2020
Petition Date:	January 23, 2020
Period for which compensation and reimbursement are sought:	May 1, 2021 through August 31, 2021
Amount of Compensation sought as actual, reasonable, and necessary:	\$579,871.93 <sup>2</sup>
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$0.00
Total Compensation Approved by Interim Fee Order to Date:	\$3,267,423.36

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 8817. The Debtor's address is 20 Moores Road, Malvern, Pennsylvania 19355.

<sup>2</sup> Stated amount reflects a 5% prompt pay discount. Bates White reserves its right to revise this amount to eliminate the prompt pay discount for the Nineteenth Monthly Statement covering August 2021 should it not receive the corresponding payment within the negotiated prompt payment period.

Total Expenses Approved by Interim Fee Order to Date:	\$13,780.00
Total Allowed Compensation Paid to Date:	\$3,267,423.36
Total Allowed Expenses Paid to Date:	\$13,780.00
Compensation Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed:	\$420,929.76 <sup>3</sup>
Expenses Already Paid Pursuant to a Monthly Fee Statement But Not Yet Allowed:	\$0.00

This is a(n):  X  interim   final application

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<sup>3</sup> As of the date of this Interim Application, Bates White has not received payment for its Nineteenth Monthly Statement.

Prior Monthly Fee Statements Submitted:

Date Submitted	Month Covered	Fees <sup>4</sup>	Expenses
July 15, 2021	May 1, 2021 - May 31, 2021	\$185,797.68	\$0.00
July 30, 2021	June 1, 2021 - June 30, 2021	\$163,957.18	\$0.00
September 8, 2021	July 1, 2021 - July 31, 2021	\$117,944.88	\$0.00
October 6, 2021	August 1 - August 31, 2021	\$112,172.20 (\$118,076.00)	\$0.00
	<b>Total</b>	<b>\$579,871.93</b> <b>(\$585,775.73)</b>	<b>\$0.00</b>

To date, no objections have been received to any prior monthly fee statements.

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<sup>4</sup> Fee amounts reflect a 5% prompt pay discount, per the terms Bates White negotiated with the Debtor, provided Bates White receives payment for its Interim Amount within 30 days of submitting its invoice. As of the date of this Interim Application, Bates White has not received payment for the Interim Amount in its Nineteenth Monthly Statement and the 30 days for the prompt pay discount with respect to the Nineteenth Monthly Statement has not elapsed. The amounts in parenthesis represent the requested fees should Bates White not receive payment for the Interim Amount in its Nineteenth Monthly Statement within the prompt payment period.

**SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL**

Employee	Title	Hourly Rate 2021	Hours (May – August 2021)	Amount with prompt pay discount (May – August 2021)*	Amount without prompt pay discount for August (May – August 2021)
Bates, Charles	Partner	\$1,250.00	117.0	\$138,937.50	\$141,431.25
Mullin, Charles	Partner	\$1,025.00	0.5	\$486.88	\$486.88
Gallardo-Garcia, Jorge	Partner	\$850.00	70.8	\$57,171.00	\$57,991.25
Johnson, Samantha	Manager	\$485.00	7.4	\$3,409.55	\$3,433.80
Kincheloe, Connor	Manager	\$475.00	183.2	\$82,669.00	\$83,269.88
Sun, Phyllis	Manager	\$585.00	12.1	\$6,724.58	\$6,753.83
Xu, Alicia	Senior Economist	\$485.00	3.1	\$1,428.33	\$1,428.33
Calder, Sara	Consultant II	\$395.00	82.6	\$30,995.65	\$31,041.08
Cumbo, Peter	Consultant II	\$375.00	7.2	\$2,565.00	\$2,565.00
Miller, Justin	Consultant II	\$375.00	143.6	\$51,157.50	\$51,986.25
Sherman, Catherine	Consultant II	\$375.00	144.2	\$51,371.25	\$51,371.25
Shim, Michelle**	Consultant I	\$350.00	340.9	\$113,349.25	\$113,349.25
	Consultant II	\$375.00	56.6	\$20,163.75	\$21,225.00
Williams, Grace	Consultant I	\$350.00	5.1	\$1,695.75	\$1,695.75
Atsalis, Andrew	Project Assistant	\$195.00	95.8	\$17,746.95	\$17,746.95
<b>Total</b>			<b>1,270.1</b>	<b>\$579,871.93</b>	<b>\$585,775.73</b>

\* Fee amounts reflect a 5% prompt pay discount, per the terms Bates White negotiated with the Debtor, provided Bates White receives payment for its Interim Amount within 30 days of submitting its invoice. As of the date of this Interim Application, Bates White has not received payment for the Interim Amount in its Nineteenth Monthly Statement. The 30 days for the prompt pay discount with respect to the Nineteenth Monthly Statement have not elapsed. The amounts in the last column of the table represent the requested fees should Bates White not receive payment for the Interim Amount in its Nineteenth Monthly Statement within the prompt payment period.

\*\* Promoted from Consultant I to Consultant II effective August 1, 2021.

**COMPENSATION BY PROJECT CATEGORY**

Project Category	Total Hours	Total Fees*
Analysis	116.7	\$127,701.85 (\$129,742.48)
Client Communication	34.9	\$29,274.25 (\$29,907.38)
Data Analysis	104.4	\$41,769.60 (\$42,051.23)
Data Gathering & Processing	966.6	\$346,635.05 (\$349,094.48)
Fee Request Preparation	26.7	\$14,149.30 (\$14,258.93)
Project Management	16.1	\$14,760.63 (\$14,846.25)
Testimony	4.7	\$5,581.25 (\$5,875.00)
Research	0.0	\$0.00 (\$0.00)
<b>Total</b>	<b>1,270.1</b>	<b>\$579,871.93 (\$585,775.73)</b>

\* Fee amounts reflect a 5% prompt pay discount, per the terms Bates White negotiated with the Debtor, provided Bates White receives payment for its Interim Amount within 30 days of submitting its invoice. As of the date of this Interim Application, Bates White has not received payment for the Interim Amount in its Nineteenth Monthly Statement and the 30 days for the prompt pay discount have not elapsed. The amounts in parenthesis represent the requested fees should Bates White not receive payment for the Interim Amount in its Nineteenth Monthly Statement within the prompt payment period.

**EXPENSE SUMMARY**

Expense Category	Total Expenses
Meals	\$0.00
Research	\$0.00
Travel	\$0.00
Vendor Costs	\$0.00
<b>Total</b>	<b>\$0.00</b>

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re	:	Chapter 11
	:	
DBMP LLC, <sup>1</sup>	:	Case No. 20-30080 (JCW)
	:	
Debtor.	:	
	:	

**SUMMARY OF FIFTH INTERIM APPLICATION OF BATES WHITE LLC FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED  
AND FOR REIMBURSEMENT OF EXPENSES AS ASBESTOS CONSULTANTS TO  
THE DEBTOR FOR THE PERIOD FROM  
MAY 1, 2021 THROUGH AUGUST 31, 2021**

Bates White, LLC (“BW” or “Bates White”), asbestos consultants to the above-captioned debtor (the “Debtor”), makes its fifth interim application (the “Interim Application”) for allowance of compensation of \$579,871.93<sup>2</sup> and reimbursement of expenses of \$0.00 for the period from May 1, 2021 through August 31, 2021 (the “Compensation Period”) in accordance with the Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals, dated August 6, 2020 [Doc. 402] (the “Amended Interim Compensation Order”). In support of this application, BW respectfully represents as follows:

1. BW’s professionals expended a total of 1,270.1 hours during the Compensation Period for which compensation is requested.
2. During the Compensation Period, BW did not receive any payments or promises of payment from any source other than the Debtor for services rendered or to be

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

<sup>2</sup> Stated amount reflects a 5% prompt pay discount. Bates White reserves its right to revise this amount to eliminate the prompt pay discount for the Nineteenth Monthly Statement covering August 2021 should it not receive the corresponding payment within the negotiated prompt payment period.

rendered in any capacity whatsoever in connection with the matters covered by this application. There is no agreement or understanding between BW and any other person for sharing of compensation to be received for services rendered in this case except as allowed by section 504(b) of the Bankruptcy Code and Rule 2016 of the Federal Rules of Bankruptcy Procedure with respect to the sharing of compensation between and among partners of BW.

3. The fees charged by BW in this case are billed in accordance with its existing billing rates and procedures. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable bankruptcy and non-bankruptcy cases in a competitive national economic consulting market.

4. Pursuant to the Amended Interim Compensation Order, included with this application are (a) a schedule setting forth all BW's professionals who have performed services in this chapter 11 case during the Compensation Period, the capacities in which each individual is employed by BW, the hourly billing rate charged by BW for the services performed by such individual, the aggregate number of hours expended in this case during the Compensation Period, and the fees billed therefor; (b) a summary of services by billing category for services rendered by BW during the Compensation Period; and (c) a schedule setting forth the actual and necessary disbursements that BW incurred during the Compensation Period in connection with the performance of professional services for the Debtor and for which it seeks reimbursement.

5. BW's itemized time records for professionals performing services for the Debtor during the Compensation Period and BW's itemized records detailing expenses incurred on behalf of the Debtor during the Compensation Period are attached hereto as Exhibit A.

6. This application complies with sections 330 and 331 of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Amended



Interim Compensation Order, and the Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Western District of North Carolina (the “Local Rules”).

### **Background**

7. On January 23, 2020 (the “Petition Date”), the Debtor commenced a case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor continues in possession of its properties and is managing its businesses, as debtor in possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.<sup>3</sup>

8. On February 14, 2020, the Court entered an order appointing the official committee of asbestos personal injury claimants (the “Asbestos Committee”) [Doc. 155], and on June 1, 2020, the Court entered an order appointing a legal representative for future asbestos personal injury claimants (the “Future Claimants’ Representative”) [Doc. 310].

9. On January 23, 2020, the Debtor filed its *Ex Parte* Application for an Order Authorizing It to Retain and Employ Bates White, LLC as Asbestos Consultants as of the Petition Date (the “Retention Application”) [Doc. 19], by which the Debtor sought authority to retain and employ BW as its asbestos consultants in this chapter 11 case. On January 24, 2020, the Court entered an order (the “Retention Order”) [Doc. 37] authorizing the retention of BW as the Debtor’s asbestos consultants, which the Court modified on June 30, 2020 (the “Reconsideration Order”) [Doc. 363].

### **Summary of Services**

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<sup>3</sup> This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for this matter is proper in this district pursuant to 28 U.S.C. § 1409.

10. The professional services performed by BW were necessary and appropriate to the administration of the Debtor's chapter 11 case. These services were in the best interests of the Debtor and other parties in interest. The compensation requested is commensurate with the complexity and nature of the issues and tasks involved.

**Prior Monthly Fee Statements**

11. Pursuant to the Interim Compensation Order, BW has submitted the following monthly fee statements (the "Prior Monthly Fee Statements") to the Debtor for the four months within the Compensation Period, each of which is incorporated herein by reference in its entirety:<sup>4</sup>

Date Submitted	Period Covered	Requested Fees <sup>5</sup>	Requested Expenses	Payment Received	Amount Outstanding <sup>6</sup>
July 15, 2021	May 1 - 31, 2021	\$185,797.68	\$0.00	\$167,217.91	\$18,579.77
July 30, 2021	Jun. 1 - 30, 2021	\$163,957.18	\$0.00	\$147,561.46	\$16,395.72
September 8, 2021	Jul. 1 - 31, 2021	\$117,944.88	\$0.00	\$106,150.39	\$11,794.49
October 6, 2021	Aug. 1 - 31, 2021	\$112,172.20 (\$118,076.00)	\$0.00	\$0.00	\$112,172.20 (\$118,076.00)
	<b>Total</b>	<b>\$579,871.93</b> <b>(\$585,775.73)</b>	<b>\$0.00</b>	<b>\$420,929.76</b>	<b>\$158,942.17</b> <b>(\$164,845.97)</b>

<sup>4</sup> Copies of the Prior Monthly Fee Statements are attached hereto as Exhibit A.

<sup>5</sup> Fee amounts reflect a 5% prompt pay discount, per the terms Bates White negotiated with the Debtor, provided Bates White receives payment for its Interim Amount within 30 days of submitting its invoice. As of the date of this Interim Application, Bates White has not received payment of the Interim Amount in its Nineteenth Monthly Statement and the 30 days for the prompt pay discount have not elapsed. The amounts in parenthesis represent the requested fees should Bates White not receive payment for the Interim Amount in its Nineteenth Monthly Statement within the prompt payment period.

<sup>6</sup> As of the date of this Interim Application, Bates White has not received payment for its Nineteenth Monthly Statement. The amounts in parenthesis represent the requested fees should BW not receive payment for the Interim Amount in its Nineteenth Monthly Statement within the prompt payment period.

12. In total, BW has submitted Prior Monthly Fee Statements during the Compensation Period for total fees of \$579,871.93<sup>7</sup> and expenses of \$0.00. As of the date of this application, no party has objected to any of BW's Prior Monthly Fee Statements.

**Compensation by Project Category**

The following is a summary of the activities performed by BW's professionals during the Compensation Period, organized by project billing category.<sup>8</sup> BW grouped its services using the categories set forth below in accordance with the recommendation of the Compensation Guidelines. BW attempted to place the services provided in the category that best relates to such services. While some services may overlap categories, BW has allocated services to the most applicable category only. The services provided are generally described below by category.

13. **Asset Transactions**

During the Compensation Period, BW professionals devoted no time to this project category.

14. **Case Administration and Business Operations**

During the Compensation Period, BW professionals devoted no time to this project category.

15. **Fee Proceedings**

During the Compensation Period, BW devoted time to (a) preparing, reviewing, and supplementing the April 2021 through July 2021 invoices for privilege and to ensure

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<sup>7</sup> Amount assumes that a 5% prompt pay discount will be applicable to the Nineteenth Monthly Statement fees.

<sup>8</sup> The summary set forth below is qualified in its entirety by reference to the time and services detail attached to each Prior Monthly Fee Statement.

compliance with the Local Rules; (b) preparing, drafting, revising, and submitting its Fifteenth through Seventeenth Monthly Fee Statements; and (c) preparing, drafting, revising, and submitting its Fourth Interim Application. BW spent 26.7 hours (\$14,149.30<sup>9</sup> in fees) during the Compensation Period on this task. BW intends to seek compensation in connection with preparing this Interim Application at a later date.

**16. Financing and Relief from Stay Proceedings**

During the Compensation Period, BW professionals devoted no time to this project category.

**17. Litigation**

During the Compensation Period, BW professionals devoted no time to this project category.

**18. Plan and Disclosure**

During the Compensation Period, BW professionals devoted no time to this project category.

**19. Claims Administration**

BW serves as asbestos consultants to the Debtor in this matter. As such, BW takes primary responsibility for providing the Debtor with economic and statistical advice and analyses regarding the estimation of the Debtor's asbestos liabilities and related topics. During the Compensation Period, BW performed analyses of the Debtor's asbestos claims history and provided advice to the Debtor as requested by the Debtor's counsel. The tasks performed within this category are varied and BW has categorized its time spent in this matter using subcategories

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<sup>9</sup> Amount assumes that a 5% prompt pay discount will be applicable to the Nineteenth Monthly Statement fees.

that are more descriptive. Such subcategories are used in the Monthly Fee Statements and are summarized below.

- **Analysis:** This subcategory is for recording time spent on the analyses performed in relation with the valuation and estimation of the Debtor's asbestos claims liabilities.
- **Client Communication:** This subcategory is for recording time spent in calls and in meetings with the Debtor's counsel and representatives to discuss the chapter 11 case and BW's work in the matter. When BW staff meets with the Debtor's counsel or representatives, more than one BW staff member may be present; this is because the Debtor's counsel benefits from discussing aspects of the case with BW staff with different backgrounds and who have varied experiences with regard to a given topic. The participation of a BW staff member is customarily restricted to the time in which such member contributes to the case either through direct participation on the discussion or through gathering information from the meeting to guide future analytical tasks. Additionally, it is often beneficial to the Debtor's estate for professionals within BW to meet with each other to discuss and brainstorm ideas regarding how to approach a particular task or analysis. These meetings can often save professionals in charge of overseeing a particular issue or aspect of the case time and effort (and thus save the client fees) by tapping on the past experience of other professionals (typically, more senior). This category also includes time spent by Bates White staff on attending depositions and other court proceedings.
- **Data Analysis:** This subcategory is for recording time spent analyzing the Debtor's asbestos claims data and related publicly available data.
- **Data Gathering & Processing:** This subcategory is for recording time spent in the review, standardization, and processing of the Debtor's asbestos claims data and related publicly available data to construct an analytical database used in BW's analyses. This category also includes work performed on documenting the analyses related to testimony and on preparing the corresponding backup materials for such testimony.
- **Project Management:** This subcategory is for recording time spent in the organization of BW's work for the Debtor.
- **Research:** This subcategory is for recording time spent conducting research related to the analyses performed for the Debtor.
- **Testimony:** This subcategory is for recording time spent in deposition or trial testimony by experts in this matter.

The table below summarizes the time spent by BW and related fees in each of the subcategories described above.

Category	Billed Hours	Amount <sup>10</sup>
Analysis	116.7	\$127,701.85 (\$129,742.48)
Client Communication	34.9	\$29,274.25 (\$29,907.38)
Data Analysis	104.4	\$41,769.60 (\$42,051.23)
Data Gathering & Processing	966.6	\$346,635.05 (\$349,094.48)
Project Management	16.1	\$14,760.63 (\$14,846.25)
Testimony	4.7	\$5,581.25 (\$5,875.00)
Research	0.0	\$0.00
<b>Total</b>	<b>1,243.4</b>	<b>\$565,722.63 (\$571,516.80)</b>

## 20. Bankruptcy Write-Offs

At times, BW will not bill some or all of the time of one professional's time based upon BW's billing judgment regarding what is fair and reasonable for the client. This time is not reflected on the invoices and, therefore, is not quantified in this Interim Application. Should specific amounts to be excluded from billing to the Debtor be identified in the future, BW will include such amounts in this category.

### Expenses Incurred by BW

21. It is BW's policy with respect to expenses not to charge its clients with expenses such as telephone and facsimile charges, photocopying charges, and regular mail

<sup>10</sup> Fee amounts reflect a 5% prompt pay discount, per the terms Bates White negotiated with the Debtor, provided Bates White receives payment for its Interim Amount within 30 days of submitting its invoice. As of the date of this Interim Application, Bates White has not received payment of the Interim Amount in its Nineteenth Monthly Statement and the 30 days for the prompt pay discount have not elapsed. The amounts in parenthesis represent the requested fees should Bates White not receive payment for the Interim Amount in its Nineteenth Monthly Statement within the prompt payment period.

charges. BW customarily charges its clients for special or hand delivery charges, travel expenses, expenses for “working meals,” computerized research charges, and transcription costs. Section 330 of the Bankruptcy Code authorizes “reimbursement for actual, necessary expenses” incurred by professionals employed in a chapter 11 case. BW incurred \$0.00 in expenses to be reimbursed (“Expenses”) in rendering services to the Debtor during the Compensation Period.

### **Adjustments to Fees and Expenses**

22. BW has agreed to apply a 5% prompt discount payment to its standard rates in a Monthly Fee Request for services provided to the Debtor, provided that BW receives payment for the majority of its fees and expenses within 30 days of submitting such Monthly Fee Request. During the Compensation Period, BW discounted \$30,519.57<sup>11</sup> from the amount that BW otherwise would have charged for its services for the Compensation Period.

### **Conclusion**

23. The fees and expenses requested herein by BW are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable bankruptcy and non-bankruptcy matters in a competitive national economic consulting market.

24. No agreement or understanding exists between BW or any third person for the sharing of compensation to be received for services rendered in this case except as allowed by section 504(b) of the Bankruptcy Code and Rule 2016 of the Federal Rules of Bankruptcy Procedure with respect to the sharing of compensation between and among partners of BW.

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<sup>11</sup> As of this Interim Application’s date, BW has not received payment for its Nineteenth Monthly Fee Request. The 30-day prompt pay period for its Nineteenth Monthly Statement has not elapsed. Should the Debtor not pay within 30 days for the Interim Amount of BW’s Nineteenth Monthly Fee Request, the discount would be reduced from the \$30,519.57 stated above to \$24,615.78.

25. All of the services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtor, and not on behalf of any other entity.

**Notice**

26. This application has been served in accordance with the Amended Interim Compensation Order and the Local Rules.

**No Prior Request**

27. No prior request for the relief sought in this application has been made to this or any other court.



WHEREFORE, BW respectfully requests that, pursuant to the Amended Interim Compensation Order, the Court (i) allow on an interim basis compensation of \$579,871.93 for services rendered by BW during the Compensation Period; (ii) allow on an interim basis reimbursement of Expenses of \$0.00 for Expenses incurred during the Compensation Period; (iii) authorize payment of these allowed fees and Expenses to BW; and (iv) grant such other and further relief as the Court may deem proper.

Dated: October 27, 2021  
Washington, DC

Respectfully submitted,

/s/ Jorge Gallardo-Garcia  
Jorge Gallardo-Garcia, PhD  
Partner  
BATES WHITE LLC  
2001 K Street N.W.  
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E-mail: jorge.gallardogarcia@bateswhite.com

ASBESTOS CONSULTANTS FOR DEBTOR  
AND DEBTOR IN POSSESSION

# EXHIBIT A

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re

DBMP LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**SIXTEENTH MONTHLY STATEMENT OF FEES AND EXPENSES  
INCURRED BY BATES WHITE LLC AS ASBESTOS CONSULTANTS FOR THE  
DEBTOR FOR  
THE PERIOD FROM MAY 1, 2021 THROUGH MAY 31, 2021**

In accordance with the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 402) (the “Amended Interim Compensation Order”), Bates White LLC (“BW”), Asbestos Consultants to DBMP LLC as debtor and debtor in possession (the “Debtor”), submits its *Sixteenth Monthly Statement of Fees and Expenses Incurred by Bates White LLC as Asbestos Consultants for the Debtor for the Period From May 1, 2021 through May 31, 2021* (the “Monthly Fee Statement”).

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A is BW’s invoice for the period May 1, 2021 through May 31, 2021 (the “Statement Period”). Exhibit B provides the time entry detail for services rendered by BW during the Statement Period.

**Total Fees and Expenses For the Statement Period**

2. The total amounts of fees and expenses incurred by BW during the Statement Period are as follows:

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

Total Fees	\$195,576.50
Total Expenses	\$0.00
<b>TOTAL</b>	<b>\$195,576.50</b>

3. Pursuant to BW's agreement with Debtor, provided BW receives payment of the majority of its monthly invoice within 30 days of presentation, BW will apply a prompt payment discount of 5% to its fees. Further, pursuant to the Amended Interim Compensation Order, BW may seek payment from the Debtor for the Statement Period (the "Interim Amount"), representing (a) 90% of BW's fees and (b) 100% of its incurred expenses. With no prompt pay discount, BW's total amount for this Monthly Statement is \$195,576.50 and BW's Interim Amount for this Monthly Fee Statement is \$176,018.85, which represents 90% of BW's fees and \$0.00 in incurred expenses in the Statement Period; these amounts would leave a holdback amount of \$19,557.65. However, should BW receive payment within 30 days of the date of this invoice, BW would apply a 5% prompt pay discount to its fees resulting in a total amount for this Monthly Statement of \$185,797.68 and an Interim Amount for this Monthly Fee Statement of \$167,217.91, which represents 90% of BW's fees and \$0.00 in incurred expenses in the Statement Period; these amounts would leave a holdback amount of \$18,579.77.

4. Cumulative holdback analysis. The holdback amounts carried forward are the following:

<b>Statement Period</b>	<b>Hold-back Amount*</b>
January 1 - January 31, 2021	\$12,303.40
February 1 - February 28, 2021	\$24,211.51
March 1 - March 31, 2021	\$24,639.39
April 1 - April 30, 2021	\$27,827.40
May 1 - May 31, 2021	\$18,579.77 (\$19,557.65)
<b>Total</b>	<b>\$107,561.47 (\$108,539.35)</b>

\* Figures in parenthesis represent amounts with no prompt pay discount to BW's fees. The January 1 – May 31, 2021 statements were included in the Fourth Interim Fee Application filed on June 24<sup>th</sup>, 2021. The order awarding compensation is expected to be entered on July 15<sup>th</sup>, 2021, so Bates White expects to receive payment for the January 1– May 31, 2021 holdback amounts in short order.

**Notice and Objection Procedures**

In accordance with the Amended Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtor, DBMP LLC, 20 Moores Road, Malvern, Pennsylvania 19355 (Attn: Michael T. Starczewski, Esq., dbmp@saint-gobain.com); (b) the Debtor’s Counsel, (I) Jones Day, 1420 Peachtree Street, N.E., Suite 800, Atlanta, Georgia 30309 (Attn: Jeffrey B. Ellman, Esq., jbellman@jonesday.com; Danielle Barav-Johnson, Esq., dbarav@jonesday.com); and (II) Robinson, Bradshaw & Hinson, P.A., 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246 (Attn: Garland S. Cassada, Esq., gcassada@robinsonbradshaw.com); (c) the office of the United States Bankruptcy Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., shelley\_abel@ncwba.uscourts.gov); and (d) counsel to the Debtor’s non-debtor affiliate, CertainTeed LLC, Goodwin Procter LLP, 1900 N Street NW, Washington, District of Columbia 20036 (Attn: Richard M. Wyner, Esq., rwyner@goodwinlaw.com); (e) proposed counsel to the Official Committee of Asbestos Personal Injury Claimants, (I) Caplin & Drysdale, Chartered, One Thomas Circle NW, Suite 1100, Washington, District of Columbia 20005 (Kevin C. Maclay, Esq., kmaclay@capdale.com; James P. Wehner, Esq., jwehner@capdale.com; Todd E. Phillips, Esq., tphillips@capdale.com); (II) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie Ramsey, Esq., nramsey@rc.com; Davis Wright, Esq., dwright@rc.com); and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com).

5. Pursuant to the Amended Interim Compensation Order, objections to this Monthly Fee Statement (each, an “Objection”), if any, must be served upon the Notice Parties, including BW, no later than 14 days after this Monthly Fee Statement’s date (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtor will be authorized to pay BW an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection. As noted above, these amounts will be drawn from BW’s retainer consistent with paragraph 3(f) of the Amended Interim Compensation Order.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by BW at a later date.

Dated: July 15, 2021  
Washington, DC

Respectfully submitted,

/s/ Jorge Gallardo-Garcia

Jorge Gallardo-Garcia, PhD

Partner

BATES WHITE LLC

2001 K Street NW, North Building, Suite 500

Washington, DC 20006

Telephone: (202) 408-6110

Facsimile: (202) 408-7838

E-mail: [jorge.gallardogarcia@bateswhite.com](mailto:jorge.gallardogarcia@bateswhite.com)

ASBESTOS CONSULTANTS FOR DEBTOR  
AND DEBTOR IN POSSESSION

**EXHIBIT A**

**Bates White LLC Invoice**

In Account With  
Bates White LLC  
Washington, DC  
2001 K Street NW, North Building, Suite 500  
Washington, DC 20006  
(202) 408-6110

July 15, 2021

DBMP LLC  
c/o Leslie Dallas  
20 Moores Road  
Malvern, PA 19355

For consulting services rendered for the period May 1, 2021 through May 31, 2021:

**INTERIM AMOUNT AT STANDARD RATES AND PROMPT PAY DISCOUNT RATES**

Concept	No prompt pay discount	With prompt pay discount
Total Fees	\$195,576.50	\$195,576.50
5% Prompt Payment Discount*	\$0.00	\$9,778.83
10% Hold-Back Amount	\$19,557.65	\$18,579.77
Total Disbursements & Charges	\$0.00	\$0.00
<b>TOTAL INTERIM AMOUNT PAYABLE</b>	<b>\$176,018.85</b>	<b>\$167,217.91</b>

\* Fees subject to a 5% prompt pay discount, per the terms Bates White negotiated with the Debtor, provided Bates White receives payment for its Interim Amount within 30 days of submitting its invoice.



Bates White LLC

**SUMMARY BY CATEGORY**  
**May 1 through May 31, 2021**

Category	Billing Code	Billed Hours	Total Fees*
Analysis	L120	35.7	\$42,505.00
Client Communication	L130	10.8	\$8,590.00
Data Analysis	L130	26.9	\$10,210.50
Data Gathering & Processing	L130	366.7	\$126,578.00
Fee Request Preparation	B160	7.2	\$3,903.00
Project Management	L130	4.0	\$3,790.00
Total Fees		451.3	\$195,576.50
Total Disbursements & Charges			\$0.00
<b>TOTAL</b>			<b>\$195,576.50</b>

\* Total Fees based on standard rates without prompt pay discount.

Bates White LLC

**FEE SUMMARY BY TIMEKEEPER**  
**May 1 through May 31, 2021**

Timekeeper Name	Title	Billed Hours	Billing Rate*	Total Fees*
Bates, Charles	Partner	34.4	\$1,250.00	\$43,000.00
Gallardo-Garcia, Jorge	Partner	19.2	\$850.00	\$16,320.00
Johnson, Samantha	Manager	3.3	\$485.00	\$1,600.50
Kincheloe, Connor	Manager	44.3	\$475.00	\$21,042.50
Sun, Phyllis	Manager	7.4	\$585.00	\$4,329.00
Xu, Alicia	Senior Economist	1.1	\$485.00	\$533.50
Calder, Sara	Consultant II	30.5	\$395.00	\$12,047.50
Cumbo, Peter	Consultant II	2.4	\$375.00	\$900.00
Miller, Justin	Consultant II	17.4	\$375.00	\$6,525.00
Sherman, Catherine	Consultant II	65.2	\$375.00	\$24,450.00
Shim, Michelle	Consultant I	128.7	\$350.00	\$45,045.00
Williams, Grace	Consultant I	5.1	\$350.00	\$1,785.00
Atsalis, Andrew	Research Assistant	92.3	\$195.00	\$17,998.50
<b>TOTAL</b>		<b>451.3</b>		<b>\$195,576.50</b>

\* Billing Rates and Total Fees based on standard rates without prompt pay discount.

Bates White LLC

**DISBURSEMENT SUMMARY**  
**May 1 through May 31, 2021**

Category	Expenses
Research	\$0.00
Travel	\$0.00
Meals	\$0.00
Vendor costs	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>

**EXHIBIT B**

**Bates White LLC Time Detail**

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
5/1/2021	Atsalis, Andrew	0.8	\$ -	Data Gathering & Processing	L130	Reviewed publicly-sourced trial data	\$ 195.00	\$ 156.00
5/3/2021	Atsalis, Andrew	1.7	\$ -	Data Gathering & Processing	L130	Analyzed trial data from public sources	\$ 195.00	\$ 331.50
5/3/2021	Atsalis, Andrew	2.3	\$ -	Data Gathering & Processing	L130	Researched publicly available data sources	\$ 195.00	\$ 448.50
5/4/2021	Atsalis, Andrew	1.9	\$ -	Data Gathering & Processing	L130	Assessed outcomes found in publicly available trial summaries	\$ 195.00	\$ 370.50
5/4/2021	Atsalis, Andrew	2.1	\$ -	Data Gathering & Processing	L130	Reviewing publicly available data	\$ 195.00	\$ 409.50
5/5/2021	Atsalis, Andrew	0.9	\$ -	Data Gathering & Processing	L130	Continued reviewing publicly available data sources	\$ 195.00	\$ 175.50
5/5/2021	Atsalis, Andrew	3.1	\$ -	Data Gathering & Processing	L130	Documenting publicly available data sources	\$ 195.00	\$ 604.50
5/6/2021	Atsalis, Andrew	0.8	\$ -	Data Gathering & Processing	L130	Reviewed publicly-sourced data	\$ 195.00	\$ 156.00
5/6/2021	Atsalis, Andrew	3.2	\$ -	Data Gathering & Processing	L130	Researched and recorded publicly-sourced verdict outcomes	\$ 195.00	\$ 624.00
5/7/2021	Atsalis, Andrew	2.1	\$ -	Data Gathering & Processing	L130	Assessed publicly available asbestos-related trial data	\$ 195.00	\$ 409.50
5/7/2021	Atsalis, Andrew	1.9	\$ -	Data Gathering & Processing	L130	Collected and updated data from public sources	\$ 195.00	\$ 370.50
5/9/2021	Atsalis, Andrew	2.9	\$ -	Data Gathering & Processing	L130	Documented public trial and verdict information	\$ 195.00	\$ 565.50
5/9/2021	Atsalis, Andrew	3.1	\$ -	Data Gathering & Processing	L130	Evaluated publicly available verdict outcomes	\$ 195.00	\$ 604.50
5/10/2021	Atsalis, Andrew	1.4	\$ -	Data Gathering & Processing	L130	Reviewed data from public sources	\$ 195.00	\$ 273.00
5/10/2021	Atsalis, Andrew	2.6	\$ -	Data Gathering & Processing	L130	Documented publicly available asbestos-related verdict outcomes	\$ 195.00	\$ 507.00
5/11/2021	Atsalis, Andrew	1.9	\$ -	Data Gathering & Processing	L130	Evaluated data sourced from public sources	\$ 195.00	\$ 370.50
5/11/2021	Atsalis, Andrew	2.1	\$ -	Data Gathering & Processing	L130	Gathered relevant verdict info from publicly sourced articles	\$ 195.00	\$ 409.50
5/12/2021	Atsalis, Andrew	0.8	\$ -	Data Gathering & Processing	L130	Reviewed and updated publicly-sourced verdict data	\$ 195.00	\$ 156.00
5/12/2021	Atsalis, Andrew	3.2	\$ -	Data Gathering & Processing	L130	Collected and recorded asbestos trial information from public summary articles	\$ 195.00	\$ 624.00
5/13/2021	Atsalis, Andrew	1.6	\$ -	Data Gathering & Processing	L130	Assessed publicly-sourced information and data	\$ 195.00	\$ 312.00
5/13/2021	Atsalis, Andrew	2.4	\$ -	Data Gathering & Processing	L130	Reviewed publicly available data	\$ 195.00	\$ 468.00
5/14/2021	Atsalis, Andrew	1.3	\$ -	Data Gathering & Processing	L130	Reviewed trial data from public sources	\$ 195.00	\$ 253.50
5/14/2021	Atsalis, Andrew	2.7	\$ -	Data Gathering & Processing	L130	Researched asbestos trial information from public sources	\$ 195.00	\$ 526.50
5/16/2021	Atsalis, Andrew	1.6	\$ -	Data Gathering & Processing	L130	Reviewed and updated records of publicly sourced trial information	\$ 195.00	\$ 312.00
5/17/2021	Atsalis, Andrew	1.8	\$ -	Data Gathering & Processing	L130	Assessed publicly available asbestos data	\$ 195.00	\$ 351.00
5/17/2021	Atsalis, Andrew	2.2	\$ -	Data Gathering & Processing	L130	Reviewed publicly-sourced verdict data	\$ 195.00	\$ 429.00
5/18/2021	Atsalis, Andrew	1.8	\$ -	Data Gathering & Processing	L130	Documented trial information from public sources	\$ 195.00	\$ 351.00
5/18/2021	Atsalis, Andrew	1.7	\$ -	Data Gathering & Processing	L130	QC of publicly available data collection	\$ 195.00	\$ 331.50
5/19/2021	Atsalis, Andrew	1.9	\$ -	Data Gathering & Processing	L130	Documented publicly available trial data	\$ 195.00	\$ 370.50
5/19/2021	Atsalis, Andrew	1.6	\$ -	Data Gathering & Processing	L130	Gathered relevant verdict info from publicly sourced articles	\$ 195.00	\$ 312.00
5/20/2021	Atsalis, Andrew	2.4	\$ -	Data Gathering & Processing	L130	Collected asbestos trial information from public summary articles	\$ 195.00	\$ 468.00
5/20/2021	Atsalis, Andrew	1.6	\$ -	Data Gathering & Processing	L130	Researched and recorded publicly-sourced data	\$ 195.00	\$ 312.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
5/21/2021	Atsalis, Andrew	2.1	\$ -	Data Gathering & Processing	L130	Determined and recorded relevant variables extracted from public trial summaries	\$ 195.00	\$ 409.50
5/21/2021	Atsalis, Andrew	1.9	\$ -	Data Gathering & Processing	L130	Reviewed and updated data from public sources	\$ 195.00	\$ 370.50
5/24/2021	Atsalis, Andrew	2.3	\$ -	Data Gathering & Processing	L130	Documented asbestos data from publicly available articles	\$ 195.00	\$ 448.50
5/25/2021	Atsalis, Andrew	2.4	\$ -	Data Gathering & Processing	L130	Assessed information found in publicly available asbestos-related trial summaries	\$ 195.00	\$ 468.00
5/25/2021	Atsalis, Andrew	1.6	\$ -	Data Gathering & Processing	L130	Recorded information from publicly sourced trial data	\$ 195.00	\$ 312.00
5/26/2021	Atsalis, Andrew	2.9	\$ -	Data Gathering & Processing	L130	Collected and evaluated data from public summary articles	\$ 195.00	\$ 565.50
5/27/2021	Atsalis, Andrew	1.9	\$ -	Data Gathering & Processing	L130	Reviewed and updated public verdict information	\$ 195.00	\$ 370.50
5/28/2021	Atsalis, Andrew	2.4	\$ -	Data Gathering & Processing	L130	Analyzed publicly available trial summaries	\$ 195.00	\$ 468.00
5/29/2021	Atsalis, Andrew	1.5	\$ -	Data Gathering & Processing	L130	Gathered information from publicly sourced asbestos articles	\$ 195.00	\$ 292.50
5/29/2021	Atsalis, Andrew	1.9	\$ -	Data Gathering & Processing	L130	Researched and recorded publicly-sourced verdict outcomes	\$ 195.00	\$ 370.50
5/30/2021	Atsalis, Andrew	2.2	\$ -	Data Gathering & Processing	L130	Calculated relevant verdict data from publicly sourced articles	\$ 195.00	\$ 429.00
5/30/2021	Atsalis, Andrew	1.3	\$ -	Data Gathering & Processing	L130	Determined and categorized relevant variables extracted from public data	\$ 195.00	\$ 253.50
5/31/2021	Atsalis, Andrew	2.8	\$ -	Data Gathering & Processing	L130	Documented information and recorded inputs in analysis of publicly available data	\$ 195.00	\$ 546.00
5/31/2021	Atsalis, Andrew	1.7	\$ -	Data Gathering & Processing	L130	Reviewed data drawn from publicly available sources	\$ 195.00	\$ 331.50
5/3/2021	Bates, Charles	2.5	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 3,125.00
5/3/2021	Bates, Charles	0.4	\$ -	Client Communication	L130	Call with counsel Gordon, Worf, Cassada, and Gallardo Garcia on next steps for case.	\$ 1,250.00	\$ 500.00
5/3/2021	Bates, Charles	0.2	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 250.00
5/4/2021	Bates, Charles	2.0	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 2,500.00
5/4/2021	Bates, Charles	0.5	\$ -	Analysis	L120	Work on liability analysis, continued	\$ 1,250.00	\$ 625.00
5/6/2021	Bates, Charles	3.5	\$ -	Analysis	L120	Work on mathematics of liability analysis	\$ 1,250.00	\$ 4,375.00
5/6/2021	Bates, Charles	0.2	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 250.00
5/7/2021	Bates, Charles	2.2	\$ -	Analysis	L120	Work on liability modeling	\$ 1,250.00	\$ 2,750.00
5/7/2021	Bates, Charles	2.6	\$ -	Analysis	L120	Review deposition transcript	\$ 1,250.00	\$ 3,250.00
5/7/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Review case status	\$ 1,250.00	\$ 625.00
5/10/2021	Bates, Charles	2.1	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 2,625.00
5/10/2021	Bates, Charles	0.3	\$ -	Client Communication	L130	Call with counsel Cassada, Worf, and Gordon, and Gallardo-Garcia on next steps.	\$ 1,250.00	\$ 375.00
5/11/2021	Bates, Charles	1.9	\$ -	Analysis	L120	Work on mathematics of liability analysis	\$ 1,250.00	\$ 2,375.00
5/11/2021	Bates, Charles	1.0	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 1,250.00
5/12/2021	Bates, Charles	2.5	\$ -	Analysis	L120	Continued work on liability analysis	\$ 1,250.00	\$ 3,125.00
5/13/2021	Bates, Charles	1.3	\$ -	Analysis	L120	Work on liability modeling	\$ 1,250.00	\$ 1,625.00
5/13/2021	Bates, Charles	0.3	\$ -	Project Management	L130	Review work status	\$ 1,250.00	\$ 375.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
5/17/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Work on liability modeling	\$ 1,250.00	\$ 1,875.00
5/18/2021	Bates, Charles	1.6	\$ -	Analysis	L120	Work on liability modeling, continued.	\$ 1,250.00	\$ 2,000.00
5/18/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Reviewed status of liability analysis	\$ 1,250.00	\$ 1,875.00
5/19/2021	Bates, Charles	1.0	\$ -	Analysis	L120	Continued review of liability analysis	\$ 1,250.00	\$ 1,250.00
5/20/2021	Bates, Charles	1.0	\$ -	Client Communication	L130	Call with counsel Cassada, Ross, Geise, and Gallardo-Garcia, Kincheloe, and others on next steps (left early).	\$ 1,250.00	\$ 1,250.00
5/24/2021	Bates, Charles	1.2	\$ -	Analysis	L120	work on liability analysis	\$ 1,250.00	\$ 1,500.00
5/24/2021	Bates, Charles	0.2	\$ -	Client Communication	L130	Call with counsel Cassada, Worf, and Gordon, and Gallardo-Garcia on next steps for case.	\$ 1,250.00	\$ 250.00
5/25/2021	Bates, Charles	0.5	\$ -	Analysis	L120	Work on liability analysis and modeling	\$ 1,250.00	\$ 625.00
5/25/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 625.00
5/26/2021	Bates, Charles	1.0	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 1,250.00
5/26/2021	Bates, Charles	0.4	\$ -	Project Management	L130	Review case status	\$ 1,250.00	\$ 500.00
5/3/2021	Calder, Sara	1.8	\$ -	Data Gathering & Processing	L130	Update processing of date variables in public trust data	\$ 395.00	\$ 711.00
5/4/2021	Calder, Sara	1.3	\$ -	Data Gathering & Processing	L130	Update public trust data processing scripts	\$ 395.00	\$ 513.50
5/4/2021	Calder, Sara	1.9	\$ -	Data Gathering & Processing	L130	QC and update processing of public data	\$ 395.00	\$ 750.50
5/5/2021	Calder, Sara	1.7	\$ -	Data Gathering & Processing	L130	Process publicly available data	\$ 395.00	\$ 671.50
5/6/2021	Calder, Sara	1.4	\$ -	Data Gathering & Processing	L130	Process claims information in publicly sourced trust data	\$ 395.00	\$ 553.00
5/6/2021	Calder, Sara	0.8	\$ -	Data Gathering & Processing	L130	Update collection of public trust data	\$ 395.00	\$ 316.00
5/7/2021	Calder, Sara	1.1	\$ -	Data Gathering & Processing	L130	QC and review input files with public trust data	\$ 395.00	\$ 434.50
5/10/2021	Calder, Sara	0.8	\$ -	Data Gathering & Processing	L130	Review next steps for processing public data	\$ 395.00	\$ 316.00
5/11/2021	Calder, Sara	1.4	\$ -	Data Gathering & Processing	L130	Update processing of publicly sourced data	\$ 395.00	\$ 553.00
5/12/2021	Calder, Sara	1.6	\$ -	Data Gathering & Processing	L130	Update and format public data input tables	\$ 395.00	\$ 632.00
5/18/2021	Calder, Sara	0.3	\$ -	Data Gathering & Processing	L130	Reviewing status publicly available data collection	\$ 395.00	\$ 118.50
5/19/2021	Calder, Sara	1.8	\$ -	Data Gathering & Processing	L130	Update and QC processing of public data	\$ 395.00	\$ 711.00
5/19/2021	Calder, Sara	1.6	\$ -	Data Gathering & Processing	L130	Prepare summary stats and update processing of publicly available data	\$ 395.00	\$ 632.00
5/20/2021	Calder, Sara	2.1	\$ -	Data Gathering & Processing	L130	Update and process public trust input data files	\$ 395.00	\$ 829.50
5/20/2021	Calder, Sara	1.3	\$ -	Data Gathering & Processing	L130	Update publicly sourced data processing code	\$ 395.00	\$ 513.50
5/21/2021	Calder, Sara	1.6	\$ -	Data Gathering & Processing	L130	Continue to QC and update processing scripts	\$ 395.00	\$ 632.00
5/21/2021	Calder, Sara	0.5	\$ -	Data Gathering & Processing	L130	Review work stream and next steps	\$ 395.00	\$ 197.50
5/24/2021	Calder, Sara	0.6	\$ -	Data Gathering & Processing	L130	Update code that processes public trust information	\$ 395.00	\$ 237.00
5/24/2021	Calder, Sara	2.1	\$ -	Data Gathering & Processing	L130	QC and update publicly sourced financial data	\$ 395.00	\$ 829.50
5/25/2021	Calder, Sara	1.2	\$ -	Data Gathering & Processing	L130	Update processing of public trust data	\$ 395.00	\$ 474.00
5/26/2021	Calder, Sara	1.9	\$ -	Data Gathering & Processing	L130	QC and update processing of public trust data	\$ 395.00	\$ 750.50
5/27/2021	Calder, Sara	1.0	\$ -	Data Gathering & Processing	L130	Update processing of public data	\$ 395.00	\$ 395.00
5/28/2021	Calder, Sara	0.7	\$ -	Data Gathering & Processing	L130	QC public trust processing code	\$ 395.00	\$ 276.50
5/17/2021	Cumbo, Peter	1.0	\$ -	Data Analysis	L130	Analyzing claims data	\$ 375.00	\$ 375.00
5/28/2021	Cumbo, Peter	1.4	\$ -	Data Analysis	L130	QCing updates to claimant level matching	\$ 375.00	\$ 525.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
5/3/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Client Communication	L130	Call with counsel Gordon, Worf, Cassada, with Dr. Bates on next steps for case.	\$ 850.00	\$ 340.00
5/4/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Analysis	L120	Continue review of documents from court for analysis.	\$ 850.00	\$ 425.00
5/5/2021	Gallardo-Garcia, Jorge	0.9	\$ -	Analysis	L120	Continue reviewing deposition transcript.	\$ 850.00	\$ 765.00
5/5/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Data Gathering & Processing	L130	Continue review of data processing and identify next tasks.	\$ 850.00	\$ 510.00
5/5/2021	Gallardo-Garcia, Jorge	1.0	\$ -	Data Gathering & Processing	L130	Review database processing and plan next steps.	\$ 850.00	\$ 850.00
5/6/2021	Gallardo-Garcia, Jorge	1.3	\$ -	Analysis	L120	Continue review of deposition transcript and work on errata.	\$ 850.00	\$ 1,105.00
5/6/2021	Gallardo-Garcia, Jorge	1.1	\$ -	Analysis	L120	Review deposition transcript and work on errata.	\$ 850.00	\$ 935.00
5/7/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Analysis	L120	Work on deposition transcript edits compilation.	\$ 850.00	\$ 255.00
5/10/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Gathering & Processing	L130	Database processing status update.	\$ 850.00	\$ 340.00
5/10/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Project Management	L130	Follow up with disclosure statement.	\$ 850.00	\$ 170.00
5/10/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Client Communication	L130	Call with counsel Cassada, Worf, and Gordon, with Dr. Bates on next steps for case.	\$ 850.00	\$ 255.00
5/11/2021	Gallardo-Garcia, Jorge	0.7	\$ -	Data Gathering & Processing	L130	Claims database review and plan next steps.	\$ 850.00	\$ 595.00
5/12/2021	Gallardo-Garcia, Jorge	0.7	\$ -	Data Gathering & Processing	L130	Analytical database construction status update and plan next steps.	\$ 850.00	\$ 595.00
5/12/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Project Management	L130	Review of resource allocation and plan next steps.	\$ 850.00	\$ 255.00
5/13/2021	Gallardo-Garcia, Jorge	0.8	\$ -	Fee Request Preparation	B160	Work on monthly compensation request.	\$ 850.00	\$ 680.00
5/13/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Client Communication	L130	Call with counsel Cassada on next steps for case.	\$ 850.00	\$ 425.00
5/14/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Analysis	L130	Claim resolutions and filings analysis.	\$ 850.00	\$ 340.00
5/14/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Gathering & Processing	L130	Database processing work status update and plan next steps for analytical database.	\$ 850.00	\$ 340.00
5/17/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Analysis	L120	Finalize deposition transcript errata.	\$ 850.00	\$ 340.00
5/19/2021	Gallardo-Garcia, Jorge	0.9	\$ -	Data Gathering & Processing	L130	Work on review of analytical database and plan next steps for processing.	\$ 850.00	\$ 765.00
5/20/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Data Gathering & Processing	L130	Review publicly available data collection process and plan next steps.	\$ 850.00	\$ 425.00
5/20/2021	Gallardo-Garcia, Jorge	1.7	\$ -	Client Communication	L130	Call with counsel Cassada, Ross, Geise, with Dr. Bates, Kincheloe, and others on next steps for case.	\$ 850.00	\$ 1,445.00
5/21/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Analysis	L120	Review materials provided by counsel.	\$ 850.00	\$ 170.00
5/21/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Analysis	L120	Review data processing tasks.	\$ 850.00	\$ 510.00
5/21/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Project Management	L130	Finalize updated disclosure.	\$ 850.00	\$ 170.00
5/21/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Client Communication	L130	Call with counsel Ross on next steps for case.	\$ 850.00	\$ 255.00
5/24/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Data Gathering & Processing	L130	Analytical database review and plan next steps.	\$ 850.00	\$ 510.00
5/24/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Fee Request Preparation	B160	Work on monthly compensation request.	\$ 850.00	\$ 340.00
5/24/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Client Communication	L130	Call with counsel Cassada, Worf, and Gordon, with Dr. Bates on next steps for case.	\$ 850.00	\$ 170.00
5/26/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Data Gathering & Processing	L130	Database construction status update.	\$ 850.00	\$ 425.00



Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
5/27/2021	Gallardo-Garcia, Jorge	1.9	\$ -	Client Communication	L130	Call with counsel Ross, Geise, Cassada, with Kincheloe on next steps for case.	\$ 850.00	\$ 1,615.00
5/11/2021	Johnson, Samantha	0.7	\$ -	Fee Request Preparation	B160	Preparing for fee application	\$ 485.00	\$ 339.50
5/12/2021	Johnson, Samantha	0.5	\$ -	Fee Request Preparation	B160	Begin preparation for interim application	\$ 485.00	\$ 242.50
5/12/2021	Johnson, Samantha	1.3	\$ -	Fee Request Preparation	B160	Updating monthly fee application info	\$ 485.00	\$ 630.50
5/13/2021	Johnson, Samantha	0.5	\$ -	Fee Request Preparation	B160	continue preparing monthly application	\$ 485.00	\$ 242.50
5/25/2021	Johnson, Samantha	0.3	\$ -	Fee Request Preparation	B160	Updating fee application information	\$ 485.00	\$ 145.50
5/3/2021	Kincheloe, Connor	1.4	\$ -	Data Gathering & Processing	L130	QC of claims data processing updates	\$ 475.00	\$ 665.00
5/4/2021	Kincheloe, Connor	0.9	\$ -	Data Gathering & Processing	L130	Continued QC of claimant-level data processing updates	\$ 475.00	\$ 427.50
5/4/2021	Kincheloe, Connor	1.3	\$ -	Data Gathering & Processing	L130	QC of claimant-level data processing and merging	\$ 475.00	\$ 617.50
5/5/2021	Kincheloe, Connor	1.3	\$ -	Data Gathering & Processing	L130	QC of claimant-level data processing updates	\$ 475.00	\$ 617.50
5/5/2021	Kincheloe, Connor	2.2	\$ -	Data Gathering & Processing	L130	QC of claims data processing updates	\$ 475.00	\$ 1,045.00
5/5/2021	Kincheloe, Connor	1.1	\$ -	Data Gathering & Processing	L130	Reviewing status of updates to claims-data processing	\$ 475.00	\$ 522.50
5/6/2021	Kincheloe, Connor	1.8	\$ -	Data Gathering & Processing	L130	Continued QC of claims data processing updates	\$ 475.00	\$ 855.00
5/6/2021	Kincheloe, Connor	1.1	\$ -	Data Gathering & Processing	L130	QC of publicly-available trust data collection	\$ 475.00	\$ 522.50
5/6/2021	Kincheloe, Connor	1.5	\$ -	Data Gathering & Processing	L130	QC of claims data processing	\$ 475.00	\$ 712.50
5/7/2021	Kincheloe, Connor	1.8	\$ -	Data Gathering & Processing	L130	QC of publicly-available claims data processing updates	\$ 475.00	\$ 855.00
5/7/2021	Kincheloe, Connor	1.7	\$ -	Data Gathering & Processing	L130	Reviewing publicly available trust data collection and processing	\$ 475.00	\$ 807.50
5/10/2021	Kincheloe, Connor	2.4	\$ -	Data Gathering & Processing	L130	QC of analytical claims database processing updates	\$ 475.00	\$ 1,140.00
5/11/2021	Kincheloe, Connor	1.0	\$ -	Project Management	L130	Reviewing status of data processing tasks	\$ 475.00	\$ 475.00
5/11/2021	Kincheloe, Connor	1.4	\$ -	Data Gathering & Processing	L130	Reviewing status of claims data processing updates	\$ 475.00	\$ 665.00
5/12/2021	Kincheloe, Connor	1.5	\$ -	Data Gathering & Processing	L130	QC of claims-level data processing scripts and updates	\$ 475.00	\$ 712.50
5/12/2021	Kincheloe, Connor	2.1	\$ -	Data Gathering & Processing	L130	Continued QC of publicly available claims data processing	\$ 475.00	\$ 997.50
5/12/2021	Kincheloe, Connor	2.3	\$ -	Data Gathering & Processing	L130	QC of publicly available claims data processing updates	\$ 475.00	\$ 1,092.50
5/13/2021	Kincheloe, Connor	2.7	\$ -	Data Gathering & Processing	L130	Reviewing and QC of data grouping code	\$ 475.00	\$ 1,282.50
5/13/2021	Kincheloe, Connor	2.1	\$ -	Fee Request Preparation	B160	Reviewing and preparing monthly compensation request	\$ 475.00	\$ 997.50
5/14/2021	Kincheloe, Connor	1.2	\$ -	Data Gathering & Processing	L130	Updating claims-level data processing, cont.	\$ 475.00	\$ 570.00
5/14/2021	Kincheloe, Connor	1.3	\$ -	Data Gathering & Processing	L130	Updating claims-level data processing	\$ 475.00	\$ 617.50
5/17/2021	Kincheloe, Connor	1.2	\$ -	Data Analysis	L130	Reviewing claims data analysis and updates to processing	\$ 475.00	\$ 570.00
5/18/2021	Kincheloe, Connor	1.0	\$ -	Data Gathering & Processing	L130	Reviewing updates and status of publicly available data collection	\$ 475.00	\$ 475.00
5/19/2021	Kincheloe, Connor	0.2	\$ -	Project Management	L130	Reviewing status of project workstreams and data processing	\$ 475.00	\$ 95.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
5/20/2021	Kincheloe, Connor	0.5	\$ -	Data Gathering & Processing	L130	Reviewing status of publicly-available data collection	\$ 475.00	\$ 237.50
5/20/2021	Kincheloe, Connor	1.7	\$ -	Client Communication	L130	Call with counsel Cassada, Ross, and Geise, and Dr. Bates, and Gallardo-Garcia, and others to discuss next steps for case analysis	\$ 475.00	\$ 807.50
5/21/2021	Kincheloe, Connor	1.8	\$ -	Data Gathering & Processing	L130	Reviewing status of publicly available trust data collection and processing	\$ 475.00	\$ 855.00
5/24/2021	Kincheloe, Connor	0.6	\$ -	Fee Request Preparation	B160	Preparing monthly compensation request	\$ 475.00	\$ 285.00
5/24/2021	Kincheloe, Connor	1.3	\$ -	Data Gathering & Processing	L130	QC of updates to claimant-level data processing	\$ 475.00	\$ 617.50
5/27/2021	Kincheloe, Connor	1.9	\$ -	Client Communication	L130	Call with counsel Cassada, Ross, Geise, and Gallardo-Garcia, and others to discuss next steps for analysis	\$ 475.00	\$ 902.50
5/4/2021	Miller, Justin	1.1	\$ -	Data Gathering & Processing	L130	Reviewed claims data processing scripts	\$ 375.00	\$ 412.50
5/5/2021	Miller, Justin	2.2	\$ -	Data Gathering & Processing	L130	Review of public data processing scripts and updates	\$ 375.00	\$ 825.00
5/10/2021	Miller, Justin	0.6	\$ -	Data Gathering & Processing	L130	Updating data processing scripts	\$ 375.00	\$ 225.00
5/11/2021	Miller, Justin	2.2	\$ -	Data Gathering & Processing	L130	QC of claims data processing scripts	\$ 375.00	\$ 825.00
5/12/2021	Miller, Justin	2.6	\$ -	Data Gathering & Processing	L130	Reviewed data processing code and scripts	\$ 375.00	\$ 975.00
5/13/2021	Miller, Justin	2.1	\$ -	Data Gathering & Processing	L130	Reviewed scripts for claims data processing	\$ 375.00	\$ 787.50
5/14/2021	Miller, Justin	0.6	\$ -	Data Gathering & Processing	L130	Updates to claims data processing code	\$ 375.00	\$ 225.00
5/17/2021	Miller, Justin	1.7	\$ -	Data Gathering & Processing	L130	Reviewed claims data processing script updates	\$ 375.00	\$ 637.50
5/20/2021	Miller, Justin	1.3	\$ -	Data Gathering & Processing	L130	QC of claims data processing code	\$ 375.00	\$ 487.50
5/24/2021	Miller, Justin	1.3	\$ -	Data Gathering & Processing	L130	QC of claims data processing code, continued.	\$ 375.00	\$ 487.50
5/25/2021	Miller, Justin	1.7	\$ -	Data Gathering & Processing	L130	Reviewed claims data processing code and scripts	\$ 375.00	\$ 637.50
5/4/2021	Sherman, Catherine	1.7	\$ -	Data Gathering & Processing	L130	Evaluated publicly sourced data	\$ 375.00	\$ 637.50
5/4/2021	Sherman, Catherine	1.8	\$ -	Data Gathering & Processing	L130	Assessed verdict data from public articles	\$ 375.00	\$ 675.00
5/5/2021	Sherman, Catherine	1.6	\$ -	Data Gathering & Processing	L130	Recorded relevant variables from publicly sourced data	\$ 375.00	\$ 600.00
5/5/2021	Sherman, Catherine	2.2	\$ -	Data Gathering & Processing	L130	Summarized research for publicly available data	\$ 375.00	\$ 825.00
5/6/2021	Sherman, Catherine	1.2	\$ -	Data Gathering & Processing	L130	Collected publicly available data	\$ 375.00	\$ 450.00
5/6/2021	Sherman, Catherine	2.4	\$ -	Data Gathering & Processing	L130	Analyzed outcomes in publicly sourced data	\$ 375.00	\$ 900.00
5/7/2021	Sherman, Catherine	1.2	\$ -	Data Gathering & Processing	L130	Researched publicly sourced data	\$ 375.00	\$ 450.00
5/7/2021	Sherman, Catherine	1.9	\$ -	Data Gathering & Processing	L130	Updated and documented verdict information from publicly available articles	\$ 375.00	\$ 712.50
5/10/2021	Sherman, Catherine	2.3	\$ -	Data Gathering & Processing	L130	Assessed inputs in public verdict data	\$ 375.00	\$ 862.50
5/10/2021	Sherman, Catherine	1.7	\$ -	Data Gathering & Processing	L130	Gathered and evaluated publicly available sources on trial outcomes	\$ 375.00	\$ 637.50
5/11/2021	Sherman, Catherine	2.6	\$ -	Data Gathering & Processing	L130	Evaluated publicly available data	\$ 375.00	\$ 975.00
5/11/2021	Sherman, Catherine	0.8	\$ -	Data Gathering & Processing	L130	Documented verdict information sourced from public articles	\$ 375.00	\$ 300.00
5/12/2021	Sherman, Catherine	2.3	\$ -	Data Analysis	L130	Analyzed trial outcomes in publicly sourced verdict data	\$ 375.00	\$ 862.50
5/12/2021	Sherman, Catherine	1.6	\$ -	Data Gathering & Processing	L130	Recorded publicly available trial data	\$ 375.00	\$ 600.00
5/13/2021	Sherman, Catherine	1.7	\$ -	Data Gathering & Processing	L130	Collected public data analysis	\$ 375.00	\$ 637.50
5/13/2021	Sherman, Catherine	1.9	\$ -	Data Gathering & Processing	L130	Updated variables in publicly sourced verdict data	\$ 375.00	\$ 712.50

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
5/14/2021	Sherman, Catherine	1.8	\$ -	Data Gathering & Processing	L130	Recorded data from public sources	\$ 375.00	\$ 675.00
5/14/2021	Sherman, Catherine	1.4	\$ -	Data Analysis	L130	Calculated inputs for publicly sourced trial data	\$ 375.00	\$ 525.00
5/14/2021	Sherman, Catherine	2.7	\$ -	Data Gathering & Processing	L130	Researched public verdict information	\$ 375.00	\$ 1,012.50
5/18/2021	Sherman, Catherine	1.2	\$ -	Data Gathering & Processing	L130	Recorded publicly sourced data	\$ 375.00	\$ 450.00
5/18/2021	Sherman, Catherine	1.6	\$ -	Data Analysis	L130	Assessed publicly available data	\$ 375.00	\$ 600.00
5/19/2021	Sherman, Catherine	2.6	\$ -	Data Analysis	L130	Analyzed relevant fields in public data	\$ 375.00	\$ 975.00
5/19/2021	Sherman, Catherine	2.3	\$ -	Data Gathering & Processing	L130	Documented and reviewed publicly available verdict information	\$ 375.00	\$ 862.50
5/20/2021	Sherman, Catherine	1.9	\$ -	Data Gathering & Processing	L130	Evaluated data inputs for public verdict data analysis	\$ 375.00	\$ 712.50
5/20/2021	Sherman, Catherine	2.1	\$ -	Data Gathering & Processing	L130	Updated and reviewed publicly sourced trial information	\$ 375.00	\$ 787.50
5/24/2021	Sherman, Catherine	1.4	\$ -	Data Analysis	L130	Tabulated variables in publicly sourced trial data	\$ 375.00	\$ 525.00
5/24/2021	Sherman, Catherine	2.1	\$ -	Data Gathering & Processing	L130	Assessed information from public trial summaries	\$ 375.00	\$ 787.50
5/25/2021	Sherman, Catherine	2.7	\$ -	Data Gathering & Processing	L130	Analyzed publicly sourced trial data	\$ 375.00	\$ 1,012.50
5/25/2021	Sherman, Catherine	1.8	\$ -	Data Gathering & Processing	L130	Recorded publicly available verdict information	\$ 375.00	\$ 675.00
5/26/2021	Sherman, Catherine	1.9	\$ -	Data Analysis	L130	Calculated relevant variables for publicly sourced verdict data	\$ 375.00	\$ 712.50
5/26/2021	Sherman, Catherine	2.4	\$ -	Data Gathering & Processing	L130	Collected and updated publicly available trial information	\$ 375.00	\$ 900.00
5/27/2021	Sherman, Catherine	0.9	\$ -	Data Gathering & Processing	L130	Documented verdict information from public sources	\$ 375.00	\$ 337.50
5/27/2021	Sherman, Catherine	2.6	\$ -	Data Analysis	L130	Evaluated publicly available data	\$ 375.00	\$ 975.00
5/28/2021	Sherman, Catherine	1.7	\$ -	Data Gathering & Processing	L130	Recorded verdict outcomes from publicly sourced articles	\$ 375.00	\$ 637.50
5/28/2021	Sherman, Catherine	1.2	\$ -	Data Gathering & Processing	L130	Researched publicly available data sources	\$ 375.00	\$ 450.00
5/3/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Reviewing public claim-level data grouping code	\$ 350.00	\$ 805.00
5/3/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Continued QCing claim-level data standardization and supplementation	\$ 350.00	\$ 910.00
5/3/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	QCing claim-level data standardization and supplementation	\$ 350.00	\$ 770.00
5/4/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Reviewing claimant-level data processing and standardization	\$ 350.00	\$ 630.00
5/4/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	QCing public claim-level data standardization and matching	\$ 350.00	\$ 770.00
5/4/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Updating public claim-level data standardization and matching	\$ 350.00	\$ 910.00
5/5/2021	Shim, Michelle	1.9	\$ -	Data Gathering & Processing	L130	QCing claim-level data supplementation code	\$ 350.00	\$ 665.00
5/5/2021	Shim, Michelle	2.7	\$ -	Data Gathering & Processing	L130	Continued reviewing and updating claimant-level grouping code	\$ 350.00	\$ 945.00
5/5/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Reviewing and updating claimant-level grouping code	\$ 350.00	\$ 840.00
5/6/2021	Shim, Michelle	1.5	\$ -	Data Gathering & Processing	L130	Continued updating public claimant-level data grouping and standardization	\$ 350.00	\$ 525.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
5/6/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Updating public claimant-level data grouping and standardization	\$ 350.00	\$ 805.00
5/6/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Continued QCing claim-level data supplementation code	\$ 350.00	\$ 840.00
5/7/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Updating claim status data standardization script	\$ 350.00	\$ 735.00
5/7/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Continued QCing publicly available data grouping and supplementation code	\$ 350.00	\$ 595.00
5/7/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	QCing publicly available data grouping and supplementation code	\$ 350.00	\$ 910.00
5/10/2021	Shim, Michelle	1.3	\$ -	Data Gathering & Processing	L130	Continued working on claim-level data standardization script	\$ 350.00	\$ 455.00
5/10/2021	Shim, Michelle	1.2	\$ -	Data Gathering & Processing	L130	Working on claim-level data standardization script	\$ 350.00	\$ 420.00
5/10/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued reviewing and updating claim-level data processing code	\$ 350.00	\$ 805.00
5/10/2021	Shim, Michelle	1.4	\$ -	Data Gathering & Processing	L130	Reviewing and updating claim-level data processing code	\$ 350.00	\$ 490.00
5/10/2021	Shim, Michelle	1.2	\$ -	Data Gathering & Processing	L130	Reviewing and updating claim-level data processing code, cont.	\$ 350.00	\$ 420.00
5/11/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Preparing claim-level data processing and standardization	\$ 350.00	\$ 910.00
5/11/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued updating public claimant-level data matching code	\$ 350.00	\$ 770.00
5/11/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Updating public claimant-level data matching code	\$ 350.00	\$ 875.00
5/12/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Reviewing and updating public data grouping code structure	\$ 350.00	\$ 805.00
5/12/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Continued preparing claim-level data for grouping code	\$ 350.00	\$ 840.00
5/12/2021	Shim, Michelle	0.9	\$ -	Data Gathering & Processing	L130	Preparing claim-level data for grouping code	\$ 350.00	\$ 315.00
5/12/2021	Shim, Michelle	1.3	\$ -	Data Gathering & Processing	L130	Continued preparing claim-level data for grouping code	\$ 350.00	\$ 455.00
5/13/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued aggregating claimant-level data for grouping code	\$ 350.00	\$ 770.00
5/13/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Aggregating claimant-level data for grouping code	\$ 350.00	\$ 595.00
5/13/2021	Shim, Michelle	0.7	\$ -	Data Gathering & Processing	L130	Aggregating claimant-level data for grouping code, continued	\$ 350.00	\$ 245.00
5/13/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Continued reviewing and updating public data grouping code structure	\$ 350.00	\$ 875.00
5/14/2021	Shim, Michelle	1.0	\$ -	Data Gathering & Processing	L130	Continued reviewing and updating claim-level data matching for grouping code	\$ 350.00	\$ 350.00
5/14/2021	Shim, Michelle	1.4	\$ -	Data Gathering & Processing	L130	Updating claim-level data matching for grouping code	\$ 350.00	\$ 490.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
5/14/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Reviewing and updating claim-level data matching for grouping code	\$ 350.00	\$ 770.00
5/17/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Implementing processing updates for public data grouping code	\$ 350.00	\$ 770.00
5/17/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Reviewing claim-level data processing and matching code for high-value claims	\$ 350.00	\$ 735.00
5/17/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Continued updating claim-level data processing for high-value claims	\$ 350.00	\$ 595.00
5/17/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Updating claim-level data processing for high-value claims	\$ 350.00	\$ 875.00
5/18/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Working on public claimant-level data reconciliation code	\$ 350.00	\$ 910.00
5/18/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Reviewing updates to public claimant-level data matching script	\$ 350.00	\$ 595.00
5/18/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued implementing processing updates for public data grouping code	\$ 350.00	\$ 805.00
5/19/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Continued updating public claimant-level data matching and supplementation code	\$ 350.00	\$ 595.00
5/19/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Updating public claimant-level data matching and supplementation code	\$ 350.00	\$ 805.00
5/19/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Continued working on public claimant-level data reconciliation code	\$ 350.00	\$ 875.00
5/20/2021	Shim, Michelle	1.2	\$ -	Data Gathering & Processing	L130	Reviewing public claim and claimant-level data mapping	\$ 350.00	\$ 420.00
5/20/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Continued updating public claimant-level data mapping script	\$ 350.00	\$ 630.00
5/20/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Updating public claimant-level data mapping script	\$ 350.00	\$ 840.00
5/21/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued working on claimant-level grouping configuration updates	\$ 350.00	\$ 770.00
5/21/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Working on claimant-level grouping configuration updates	\$ 350.00	\$ 840.00
5/21/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued reviewing public claim and claimant-level data mapping	\$ 350.00	\$ 805.00
5/21/2021	Shim, Michelle	0.8	\$ -	Data Gathering & Processing	L130	Reviewing lawyer standardization script	\$ 350.00	\$ 280.00
5/24/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Reviewing claimant-level data grouping for public and claims data	\$ 350.00	\$ 735.00
5/24/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued incorporating claims data to claimant-level data grouping	\$ 350.00	\$ 805.00
5/24/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Incorporating claims data to claimant-level data grouping	\$ 350.00	\$ 840.00
5/25/2021	Shim, Michelle	1.2	\$ -	Data Analysis	L130	Reviewing matching code for claims data	\$ 350.00	\$ 420.00
5/25/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Updating claimant-level matching across public data	\$ 350.00	\$ 805.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
5/25/2021	Shim, Michelle	1.4	\$ -	Data Gathering & Processing	L130	Continued reviewing claimant-level data grouping for public and claims data	\$ 350.00	\$ 490.00
5/25/2021	Shim, Michelle	1.2	\$ -	Data Gathering & Processing	L130	Updating claimant-level data grouping for public and claims data	\$ 350.00	\$ 420.00
5/26/2021	Shim, Michelle	1.3	\$ -	Data Analysis	L130	Continued QCing public claims data analysis	\$ 350.00	\$ 455.00
5/26/2021	Shim, Michelle	2.1	\$ -	Data Analysis	L130	QCing public claims data analysis	\$ 350.00	\$ 735.00
5/26/2021	Shim, Michelle	1.8	\$ -	Data Analysis	L130	Continued updating matching code for claims data analysis	\$ 350.00	\$ 630.00
5/26/2021	Shim, Michelle	2.4	\$ -	Data Analysis	L130	Updating matching code for claims data analysis	\$ 350.00	\$ 840.00
5/27/2021	Shim, Michelle	1.6	\$ -	Data Gathering & Processing	L130	QCing claimant-level data processing and standardization	\$ 350.00	\$ 560.00
5/27/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Continued working on claimant-level data processing and standardization	\$ 350.00	\$ 875.00
5/27/2021	Shim, Michelle	2.8	\$ -	Data Gathering & Processing	L130	Working on claimant-level data processing and standardization	\$ 350.00	\$ 980.00
5/3/2021	Sun, Phyllis	0.6	\$ -	Data Gathering & Processing	L130	Review processing of publicly available data	\$ 585.00	\$ 351.00
5/6/2021	Sun, Phyllis	0.5	\$ -	Data Gathering & Processing	L130	Reviewing public data collection	\$ 585.00	\$ 292.50
5/12/2021	Sun, Phyllis	0.5	\$ -	Data Gathering & Processing	L130	Review progress on data collection task from public sources	\$ 585.00	\$ 292.50
5/13/2021	Sun, Phyllis	0.9	\$ -	Data Gathering & Processing	L130	Work on data standardization in public data gathering	\$ 585.00	\$ 526.50
5/17/2021	Sun, Phyllis	0.7	\$ -	Data Gathering & Processing	L130	Quality checks on standardization of extracted data from public sources	\$ 585.00	\$ 409.50
5/19/2021	Sun, Phyllis	0.7	\$ -	Data Gathering & Processing	L130	Review data extraction of trial records from public sources	\$ 585.00	\$ 409.50
5/20/2021	Sun, Phyllis	1.2	\$ -	Data Gathering & Processing	L130	QC review of publicly-available information about trial verdicts	\$ 585.00	\$ 702.00
5/24/2021	Sun, Phyllis	1.2	\$ -	Data Gathering & Processing	L130	Review task in gathering of public-sourced trial records	\$ 585.00	\$ 702.00
5/25/2021	Sun, Phyllis	0.6	\$ -	Data Gathering & Processing	L130	Review data collection protocols on publicly-sourced trial information	\$ 585.00	\$ 351.00
5/30/2021	Sun, Phyllis	0.5	\$ -	Data Gathering & Processing	L130	Review project timeline on public data collection	\$ 585.00	\$ 292.50
5/3/2021	Williams, Grace	2.9	\$ -	Data Gathering & Processing	L130	Update documentation on standardization of publicly available data	\$ 350.00	\$ 1,015.00
5/4/2021	Williams, Grace	2.2	\$ -	Data Gathering & Processing	L130	Analyze processing scripts for publicly available data	\$ 350.00	\$ 770.00
5/5/2021	Xu, Alicia	0.3	\$ -	Data Analysis	L130	Case and task status updates and plan for next step analysis	\$ 485.00	\$ 145.50
5/12/2021	Xu, Alicia	0.3	\$ -	Data Gathering & Processing	L130	Review case and task updates	\$ 485.00	\$ 145.50
5/19/2021	Xu, Alicia	0.2	\$ -	Data Gathering & Processing	L130	Follow up on task and case status	\$ 485.00	\$ 97.00
5/26/2021	Xu, Alicia	0.3	\$ -	Data Gathering & Processing	L130	Update on case and tasks	\$ 485.00	\$ 145.50

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re

DBMP LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**SEVENTEENTH MONTHLY STATEMENT OF FEES AND EXPENSES  
INCURRED BY BATES WHITE LLC AS ASBESTOS CONSULTANTS FOR THE  
DEBTOR FOR  
THE PERIOD FROM JUNE 1, 2021 THROUGH JUNE 30, 2021**

In accordance with the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 402) (the “Amended Interim Compensation Order”), Bates White LLC (“BW”), Asbestos Consultants to DBMP LLC as debtor and debtor in possession (the “Debtor”), submits its *Seventeenth Monthly Statement of Fees and Expenses Incurred by Bates White LLC as Asbestos Consultants for the Debtor for the Period From June 1, 2021 through June 30, 2021* (the “Monthly Fee Statement”).

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A is BW’s invoice for the period June 1, 2021 through June 30, 2021 (the “Statement Period”). Exhibit B provides the time entry detail for services rendered by BW during the Statement Period.

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.



**Total Fees and Expenses For the Statement Period**

2. The total amounts of fees and expenses incurred by BW during the Statement Period are as follows:

Total Fees	\$172,586.50
Total Expenses	\$0.00
<b>TOTAL</b>	<b>\$172,586.50</b>

3. Pursuant to BW's agreement with Debtor, provided BW receives payment of the majority of its monthly invoice within 30 days of presentation, BW will apply a prompt payment discount of 5% to its fees. Further, pursuant to the Amended Interim Compensation Order, BW may seek payment from the Debtor for the Statement Period (the "Interim Amount"), representing (a) 90% of BW's fees and (b) 100% of its incurred expenses. With no prompt pay discount, BW's total amount for this Monthly Statement is \$172,586.50 and BW's Interim Amount for this Monthly Fee Statement is \$155,327.85, which represents 90% of BW's fees and \$0.00 in incurred expenses in the Statement Period; these amounts would leave a holdback amount of \$17,258.65. However, should BW receive payment within 30 days of the date of this invoice, BW would apply a 5% prompt pay discount to its fees resulting in a total amount for this Monthly Statement of \$163,957.18 and an Interim Amount for this Monthly Fee Statement of \$147,561.46, which represents 90% of BW's fees and \$0.00 in incurred expenses in the Statement Period; these amounts would leave a holdback amount of \$16,395.72.

4. Cumulative holdback analysis. The holdback amounts carried forward are the following:



Statement Period	Hold-back Amount*
May 1 - May 31, 2021	\$18,579.77 (\$19,557.65)
June 1 - June 30, 2021	\$16,395.72 (\$17,258.65)
<b>Total</b>	<b>\$34,975.49 (\$36,816.30)</b>

\* Figures in parenthesis represent amounts with no prompt pay discount to BW's fees.

### **Notice and Objection Procedures**

In accordance with the Amended Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the "Notice Parties"): (a) the Debtor, DBMP LLC, 20 Moores Road, Malvern, Pennsylvania 19355 (Attn: Michael T. Starczewski, Esq., dbmp@saint-gobain.com); (b) the Debtor's Counsel, (I) Jones Day, 1420 Peachtree Street, N.E., Suite 800, Atlanta, Georgia 30309 (Attn: Jeffrey B. Ellman, Esq., jbellman@jonesday.com; Danielle Barav-Johnson, Esq., dbarav@jonesday.com); and (II) Robinson, Bradshaw & Hinson, P.A., 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246 (Attn: Garland S. Cassada, Esq., gcassada@robinsonbradshaw.com); (c) the office of the United States Bankruptcy Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., shelley\_abel@ncwba.uscourts.gov); and (d) counsel to the Debtor's non-debtor affiliate, CertainTeed LLC, Goodwin Procter LLP, 1900 N Street NW, Washington, District of Columbia 20036 (Attn: Richard M. Wyner, Esq., rwyner@goodwinlaw.com); (e) proposed counsel to the Official Committee of Asbestos Personal Injury Claimants, (I) Caplin & Drysdale, Chartered, One Thomas Circle NW, Suite 1100, Washington, District of Columbia 20005 (Kevin C. Maclay, Esq., kmaclay@capdale.com; James P. Wehner, Esq., jwehner@capdale.com; Todd E. Phillips, Esq., tphillips@capdale.com); (II) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie Ramsey, Esq., nramsey@rc.com; Davis Wright, Esq., dwright@rc.com); and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North

Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com).

5. Pursuant to the Amended Interim Compensation Order, objections to this Monthly Fee Statement (each, an “Objection”), if any, must be served upon the Notice Parties, including BW, no later than 14 days after this Monthly Fee Statement’s date (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtor will be authorized to pay BW an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection. As noted above, these amounts will be drawn from BW’s retainer consistent with paragraph 3(f) of the Amended Interim Compensation Order.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by BW at a later date.

Dated: July 30, 2021  
Washington, DC

Respectfully submitted,

/s/ Jorge Gallardo-Garcia

Jorge Gallardo-Garcia, PhD

Partner

BATES WHITE LLC

2001 K Street NW, North Building, Suite 500

Washington, DC 20006

Telephone: (202) 408-6110

Facsimile: (202) 408-7838

E-mail: jorge.gallardogarcia@bateswhite.com

ASBESTOS CONSULTANTS FOR DEBTOR  
AND DEBTOR IN POSSESSION



**EXHIBIT A**

**Bates White LLC Invoice**

In Account With  
Bates White LLC  
Washington, DC  
2001 K Street NW, North Building, Suite 500  
Washington, DC 20006  
(202) 408-6110

July 30, 2021

DBMP LLC  
c/o Leslie Dallas  
20 Moores Road  
Malvern, PA 19355

For consulting services rendered for the period June 1, 2021 through June 30, 2021:

**INTERIM AMOUNT AT STANDARD RATES AND PROMPT PAY DISCOUNT RATES**

Concept	No prompt pay discount	With prompt pay discount
Total Fees	\$172,586.50	\$172,586.50
5% Prompt Payment Discount*	\$0.00	\$8,629.33
10% Hold-Back Amount	\$17,258.65	\$16,395.72
Total Disbursements & Charges	\$0.00	\$0.00
<b>TOTAL INTERIM AMOUNT PAYABLE</b>	<b>\$155,327.85</b>	<b>\$147,561.46</b>

\* Fees subject to a 5% prompt pay discount, per the terms Bates White negotiated with the Debtor, provided Bates White receives payment for its Interim Amount within 30 days of submitting its invoice.

Bates White LLC

**SUMMARY BY CATEGORY**  
**June 1 through June 30, 2021**

Category	Billing Code	Billed Hours	Total Fees*
Analysis	L120	17.0	\$20,972.50
Client Communication	L130	5.3	\$4,817.50
Data Analysis	L130	58.8	\$23,037.50
Data Gathering & Processing	L130	285.2	\$111,343.00
Fee Request Preparation	B160	10.2	\$5,911.00
Project Management	L130	5.7	\$6,505.00
Total Fees		382.2	\$172,586.50
Total Disbursements & Charges			\$0.00
<b>TOTAL</b>			<b>\$172,586.50</b>

\* Total Fees based on standard rates without prompt pay discount.

Bates White LLC

**FEE SUMMARY BY TIMEKEEPER**  
**June 1 through June 30, 2021**

Timekeeper Name	Title	Billed Hours	Billing Rate*	Total Fees*
Bates, Charles	Partner	23.3	\$1,250.00	\$29,125.00
Gallardo-Garcia, Jorge	Partner	14.4	\$850.00	\$12,240.00
Johnson, Samantha	Manager	1.6	\$485.00	\$776.00
Kincheloe, Connor	Manager	47.4	\$475.00	\$22,515.00
Sun, Phyllis	Manager	1.3	\$585.00	\$760.50
Xu, Alicia	Senior Economist	1.2	\$485.00	\$582.00
Calder, Sara	Consultant II	25.9	\$395.00	\$10,230.50
Cumbo, Peter	Consultant II	4.8	\$375.00	\$1,800.00
Miller, Justin	Consultant II	54.6	\$375.00	\$20,475.00
Sherman, Catherine	Consultant II	77.2	\$375.00	\$28,950.00
Shim, Michelle	Consultant I	127.0	\$350.00	\$44,450.00
Atsalis, Andrew	Research Assistant	3.5	\$195.00	\$682.50
<b>TOTAL</b>		<b>382.2</b>		<b>\$172,586.50</b>

\* Billing Rates and Total Fees based on standard rates without prompt pay discount.

Bates White LLC

**DISBURSEMENT SUMMARY**  
**June 1 through June 30, 2021**

Category	Expenses
Research	\$0.00
Travel	\$0.00
Meals	\$0.00
Vendor costs	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>



**EXHIBIT B**

**Bates White LLC Time Detail**

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
6/1/2021	Atsalis, Andrew	1.2	\$ -	Data Gathering & Processing	L130	Assessed trial variables in public verdict data	\$ 195.00	\$ 234.00
6/1/2021	Atsalis, Andrew	1.8	\$ -	Data Gathering & Processing	L130	Researched verdict outcomes sourced from public trial summaries	\$ 195.00	\$ 351.00
6/2/2021	Atsalis, Andrew	0.5	\$ -	Data Gathering & Processing	L130	Reviewed inputs of variables extracted from public asbestos-related trial data	\$ 195.00	\$ 97.50
6/1/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 625.00
6/4/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Reviewed status of case workstreams	\$ 1,250.00	\$ 625.00
6/7/2021	Bates, Charles	0.2	\$ -	Client Communication	L130	Confer with Cassada, Garland, Worf, and Gallardo-Garcia on next steps	\$ 1,250.00	\$ 250.00
6/7/2021	Bates, Charles	1.3	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 1,625.00
6/8/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Continued work on liability analysis	\$ 1,250.00	\$ 1,875.00
6/9/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Analyzing DBMP data	\$ 1,250.00	\$ 1,875.00
6/10/2021	Bates, Charles	0.3	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 375.00
6/10/2021	Bates, Charles	1.0	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 1,250.00
6/14/2021	Bates, Charles	0.3	\$ -	Project Management	L130	Review status of project analysis	\$ 1,250.00	\$ 375.00
6/14/2021	Bates, Charles	0.5	\$ -	Client Communication	L130	Confer with Gordon and Cassada on next steps	\$ 1,250.00	\$ 625.00
6/14/2021	Bates, Charles	0.7	\$ -	Analysis	L120	Work on exposure analysis	\$ 1,250.00	\$ 875.00
6/15/2021	Bates, Charles	0.3	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 375.00
6/15/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Work on liability modeling and analysis	\$ 1,250.00	\$ 1,875.00
6/16/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Review status of case workstreams	\$ 1,250.00	\$ 625.00
6/16/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Work on liability modeling	\$ 1,250.00	\$ 1,875.00
6/18/2021	Bates, Charles	1.0	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 1,250.00
6/18/2021	Bates, Charles	1.0	\$ -	Client Communication	L130	Confer with counsel on next steps	\$ 1,250.00	\$ 1,250.00
6/21/2021	Bates, Charles	0.3	\$ -	Client Communication	L130	Confer with Cassada, Garland, Worf, and Gallardo-Garcia on next steps	\$ 1,250.00	\$ 375.00
6/21/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 1,875.00
6/22/2021	Bates, Charles	2.5	\$ -	Analysis	L120	Work on liability analysis, cont.	\$ 1,250.00	\$ 3,125.00
6/23/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Review status of case workstreams and analysis	\$ 1,250.00	\$ 625.00
6/23/2021	Bates, Charles	1.0	\$ -	Analysis	L120	Analyzing claims data	\$ 1,250.00	\$ 1,250.00
6/24/2021	Bates, Charles	0.3	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 375.00
6/28/2021	Bates, Charles	0.9	\$ -	Analysis	L120	Work on data analysis	\$ 1,250.00	\$ 1,125.00
6/29/2021	Bates, Charles	0.2	\$ -	Project Management	L130	Review case workstream and project status	\$ 1,250.00	\$ 250.00
6/29/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Continued review of liability analysis	\$ 1,250.00	\$ 1,875.00
6/30/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Reviewing status of case analysis	\$ 1,250.00	\$ 625.00
6/1/2021	Calder, Sara	0.4	\$ -	Data Gathering & Processing	L130	Continue to analyze publicly sourced trust data	\$ 395.00	\$ 158.00
6/1/2021	Calder, Sara	0.8	\$ -	Data Gathering & Processing	L130	Review public data	\$ 395.00	\$ 316.00
6/1/2021	Calder, Sara	0.9	\$ -	Data Gathering & Processing	L130	Analyze publicly sourced data	\$ 395.00	\$ 355.50
6/1/2021	Calder, Sara	1.2	\$ -	Data Gathering & Processing	L130	Update processing of public trust claim activity data	\$ 395.00	\$ 474.00
6/2/2021	Calder, Sara	1.6	\$ -	Data Gathering & Processing	L130	Continue to update processing of public trust claims data	\$ 395.00	\$ 632.00
6/3/2021	Calder, Sara	0.8	\$ -	Data Gathering & Processing	L130	Update publicly sourced data	\$ 395.00	\$ 316.00
6/3/2021	Calder, Sara	1.3	\$ -	Data Gathering & Processing	L130	Process public data	\$ 395.00	\$ 513.50

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
6/4/2021	Calder, Sara	1.6	\$ -	Data Gathering & Processing	L130	Update public data documentation	\$ 395.00	\$ 632.00
6/7/2021	Calder, Sara	0.3	\$ -	Data Gathering & Processing	L130	QC processing of public trust payment variables	\$ 395.00	\$ 118.50
6/7/2021	Calder, Sara	0.4	\$ -	Data Gathering & Processing	L130	Review public trust data processing work stream	\$ 395.00	\$ 158.00
6/7/2021	Calder, Sara	0.6	\$ -	Data Gathering & Processing	L130	Update documentation on publicly sourced data	\$ 395.00	\$ 237.00
6/8/2021	Calder, Sara	0.6	\$ -	Data Gathering & Processing	L130	Update public data processing work stream	\$ 395.00	\$ 237.00
6/9/2021	Calder, Sara	0.4	\$ -	Data Gathering & Processing	L130	Update public trust data collection methodology	\$ 395.00	\$ 158.00
6/9/2021	Calder, Sara	0.8	\$ -	Data Gathering & Processing	L130	Review and update publicly sourced data	\$ 395.00	\$ 316.00
6/10/2021	Calder, Sara	0.7	\$ -	Data Gathering & Processing	L130	QC publicly sourced documents	\$ 395.00	\$ 276.50
6/10/2021	Calder, Sara	1.1	\$ -	Data Gathering & Processing	L130	Review data collection processing methodology	\$ 395.00	\$ 434.50
6/11/2021	Calder, Sara	1.1	\$ -	Data Gathering & Processing	L130	Update publicly sourced data	\$ 395.00	\$ 434.50
6/11/2021	Calder, Sara	0.9	\$ -	Data Gathering & Processing	L130	QC public trust data	\$ 395.00	\$ 355.50
6/14/2021	Calder, Sara	0.6	\$ -	Data Gathering & Processing	L130	Reviewing status of data processing	\$ 395.00	\$ 237.00
6/14/2021	Calder, Sara	0.9	\$ -	Data Gathering & Processing	L130	Evaluate trust document collection methodology	\$ 395.00	\$ 355.50
6/15/2021	Calder, Sara	1.8	\$ -	Data Gathering & Processing	L130	Continue to review and update public trust data and document collection	\$ 395.00	\$ 711.00
6/16/2021	Calder, Sara	1.6	\$ -	Data Gathering & Processing	L130	Review data collection and processing of public data	\$ 395.00	\$ 632.00
6/17/2021	Calder, Sara	1.1	\$ -	Data Gathering & Processing	L130	Continue to review data gathering and processing	\$ 395.00	\$ 434.50
6/22/2021	Calder, Sara	1.5	\$ -	Data Gathering & Processing	L130	Analyze and review data from publicly sourced trust documents	\$ 395.00	\$ 592.50
6/23/2021	Calder, Sara	1.6	\$ -	Data Gathering & Processing	L130	Analyze publicly sourced trust data	\$ 395.00	\$ 632.00
6/24/2021	Calder, Sara	1.3	\$ -	Data Gathering & Processing	L130	Continue analysis of public data	\$ 395.00	\$ 513.50
6/3/2021	Cumbo, Peter	2.1	\$ -	Data Analysis	L130	Working on summary claimant tabulations using public claims data	\$ 375.00	\$ 787.50
6/3/2021	Cumbo, Peter	2.2	\$ -	Data Analysis	L130	QCing claimant summary tabulations	\$ 375.00	\$ 825.00
6/8/2021	Cumbo, Peter	0.5	\$ -	Data Analysis	L130	Reviewing public claims data for summary tabulations	\$ 375.00	\$ 187.50
6/2/2021	Gallardo-Garcia, Jorge	0.7	\$ -	Data Gathering & Processing	L130	Analytical database construction status update.	\$ 850.00	\$ 595.00
6/3/2021	Gallardo-Garcia, Jorge	0.8	\$ -	Data Gathering & Processing	L130	Analytical database construction review and plan next steps.	\$ 850.00	\$ 680.00
6/7/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Client Communication	L130	Call with counsel Cassada, Gordon and Worf, with Dr. Bates on next steps for case.	\$ 850.00	\$ 170.00
6/7/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Gathering & Processing	L130	Database processing status update and plan next steps.	\$ 850.00	\$ 340.00
6/7/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Data Analysis	L130	Review claims data summary.	\$ 850.00	\$ 170.00
6/7/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Fee Request Preparation	B160	Work on interim application review.	\$ 850.00	\$ 255.00
6/8/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Fee Request Preparation	B160	Work on interim application review, cont.	\$ 850.00	\$ 340.00
6/8/2021	Gallardo-Garcia, Jorge	0.7	\$ -	Data Gathering & Processing	L130	Database processing status update and plan next steps.	\$ 850.00	\$ 595.00
6/9/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Data Gathering & Processing	L130	Reviewing status of data processing	\$ 850.00	\$ 510.00
6/9/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Gathering & Processing	L130	Review potential sources of data and plan next steps.	\$ 850.00	\$ 340.00
6/10/2021	Gallardo-Garcia, Jorge	0.7	\$ -	Data Gathering & Processing	L130	Review data collection process and plan next steps.	\$ 850.00	\$ 595.00
6/14/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Data Gathering & Processing	L130	Review public data availability and plan next steps.	\$ 850.00	\$ 510.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
6/15/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Fee Request Preparation	B160	Work on monthly compensation request.	\$ 850.00	\$ 425.00
6/15/2021	Gallardo-Garcia, Jorge	1.1	\$ -	Fee Request Preparation	B160	Work on interim application.	\$ 850.00	\$ 935.00
6/15/2021	Gallardo-Garcia, Jorge	0.7	\$ -	Data Gathering & Processing	L130	Review data availability and plan next steps for data collection.	\$ 850.00	\$ 595.00
6/15/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Gathering & Processing	L130	Analytical database construction status update.	\$ 850.00	\$ 340.00
6/16/2021	Gallardo-Garcia, Jorge	1.0	\$ -	Data Gathering & Processing	L130	Review collection of publicly available data.	\$ 850.00	\$ 850.00
6/17/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Client Communication	L130	Call with counsel Cassada, Worf, Gordon, Kincheloe, and others on next steps for case.	\$ 850.00	\$ 425.00
6/17/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Analysis	L120	Prepare for call with counsel.	\$ 850.00	\$ 170.00
6/17/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Gathering & Processing	L130	Identify tasks for data processing.	\$ 850.00	\$ 340.00
6/21/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Client Communication	L130	Call with counsel Cassada, Gordon, Worf, and Dr. Bates on next steps for case.	\$ 850.00	\$ 255.00
6/22/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Analysis	L120	Review available materials for call with counsel.	\$ 850.00	\$ 255.00
6/22/2021	Gallardo-Garcia, Jorge	1.0	\$ -	Client Communication	L130	Call with counsel Cassada, Ross, Geise, with Kincheloe and others on next steps for case.	\$ 850.00	\$ 850.00
6/22/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Fee Request Preparation	B160	Review interim application draft.	\$ 850.00	\$ 425.00
6/23/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Data Gathering & Processing	L130	Status update of public trust data collection and plan next steps.	\$ 850.00	\$ 510.00
6/24/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Data Gathering & Processing	L130	Review publicly available data and plan next steps for data processing.	\$ 850.00	\$ 425.00
6/30/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Gathering & Processing	L130	Review status of data processing tasks.	\$ 850.00	\$ 340.00
6/5/2021	Johnson, Samantha	0.6	\$ -	Fee Request Preparation	B160	Preparing draft interim application	\$ 485.00	\$ 291.00
6/10/2021	Johnson, Samantha	0.2	\$ -	Fee Request Preparation	B160	Begin working on monthly fee application	\$ 485.00	\$ 97.00
6/16/2021	Johnson, Samantha	0.2	\$ -	Fee Request Preparation	B160	Preparing fee application draft	\$ 485.00	\$ 97.00
6/18/2021	Johnson, Samantha	0.6	\$ -	Fee Request Preparation	B160	Preparing monthly fee application	\$ 485.00	\$ 291.00
6/2/2021	Kincheloe, Connor	0.9	\$ -	Data Analysis	L130	QC of claims-level data analysis	\$ 475.00	\$ 427.50
6/3/2021	Kincheloe, Connor	2.1	\$ -	Data Analysis	L130	Analyzing claims-level data	\$ 475.00	\$ 997.50
6/3/2021	Kincheloe, Connor	1.6	\$ -	Data Analysis	L130	Continued analyzing claims level data	\$ 475.00	\$ 760.00
6/4/2021	Kincheloe, Connor	2.1	\$ -	Data Analysis	L130	QC of claims data analysis	\$ 475.00	\$ 997.50
6/6/2021	Kincheloe, Connor	0.5	\$ -	Data Analysis	L130	Updating claims data analysis	\$ 475.00	\$ 237.50
6/6/2021	Kincheloe, Connor	1.0	\$ -	Fee Request Preparation	B160	Reviewing interim fee application	\$ 475.00	\$ 475.00
6/7/2021	Kincheloe, Connor	1.2	\$ -	Fee Request Preparation	B160	Updating and reviewing interim fee application	\$ 475.00	\$ 570.00
6/8/2021	Kincheloe, Connor	2.2	\$ -	Data Analysis	L130	Analyzing DBMP claims data	\$ 475.00	\$ 1,045.00
6/8/2021	Kincheloe, Connor	2.3	\$ -	Data Analysis	L130	QC of DBMP claims data analysis	\$ 475.00	\$ 1,092.50
6/9/2021	Kincheloe, Connor	2.2	\$ -	Data Analysis	L130	QC of claims data analysis	\$ 475.00	\$ 1,045.00
6/9/2021	Kincheloe, Connor	0.8	\$ -	Project Management	L130	Reviewing status of data processing and workstreams	\$ 475.00	\$ 380.00
6/9/2021	Kincheloe, Connor	1.9	\$ -	Data Gathering & Processing	L130	QC of claims data processing updates	\$ 475.00	\$ 902.50
6/10/2021	Kincheloe, Connor	2.2	\$ -	Data Gathering & Processing	L130	QC of claims data processing	\$ 475.00	\$ 1,045.00
6/10/2021	Kincheloe, Connor	1.5	\$ -	Data Gathering & Processing	L130	Continued QC of claims data processing	\$ 475.00	\$ 712.50
6/11/2021	Kincheloe, Connor	2.0	\$ -	Data Gathering & Processing	L130	QC of claims data processing	\$ 475.00	\$ 950.00
6/11/2021	Kincheloe, Connor	0.6	\$ -	Fee Request Preparation	B160	Updating interim application	\$ 475.00	\$ 285.00
6/14/2021	Kincheloe, Connor	1.3	\$ -	Fee Request Preparation	B160	Preparing monthly compensation request	\$ 475.00	\$ 617.50

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
6/14/2021	Kincheloe, Connor	0.4	\$ -	Fee Request Preparation	B160	Updating interim compensation request	\$ 475.00	\$ 190.00
6/14/2021	Kincheloe, Connor	2.8	\$ -	Data Analysis	L130	Analyzing DBMP claims data	\$ 475.00	\$ 1,330.00
6/15/2021	Kincheloe, Connor	0.5	\$ -	Fee Request Preparation	B160	Preparing monthly compensation request	\$ 475.00	\$ 237.50
6/15/2021	Kincheloe, Connor	0.8	\$ -	Fee Request Preparation	B160	Reviewing and updating interim application	\$ 475.00	\$ 380.00
6/15/2021	Kincheloe, Connor	1.2	\$ -	Data Analysis	L130	Analyzing DBMP claims data	\$ 475.00	\$ 570.00
6/15/2021	Kincheloe, Connor	0.6	\$ -	Data Gathering & Processing	L130	Continued review of claims data processing	\$ 475.00	\$ 285.00
6/16/2021	Kincheloe, Connor	2.5	\$ -	Data Gathering & Processing	L130	QC of claims data processing updates	\$ 475.00	\$ 1,187.50
6/17/2021	Kincheloe, Connor	0.3	\$ -	Client Communication	L130	Call with counsel Cassada, Gordon, and Gallardo-Garcia, and others to discuss next steps for case (arrived late)	\$ 475.00	\$ 142.50
6/17/2021	Kincheloe, Connor	1.5	\$ -	Data Gathering & Processing	L130	QC of claims data processing	\$ 475.00	\$ 712.50
6/17/2021	Kincheloe, Connor	1.8	\$ -	Data Gathering & Processing	L130	Continued QC of claims data processing updates	\$ 475.00	\$ 855.00
6/22/2021	Kincheloe, Connor	0.1	\$ -	Analysis	L120	Prepare for client call	\$ 475.00	\$ 47.50
6/22/2021	Kincheloe, Connor	1.0	\$ -	Client Communication	L130	Call with counsel Ross, Geise, Cassada, and Gallardo-Garcia, and others to discuss status of case and next steps for analysis	\$ 475.00	\$ 475.00
6/22/2021	Kincheloe, Connor	1.4	\$ -	Data Gathering & Processing	L130	QC of grouping code processing updates	\$ 475.00	\$ 665.00
6/23/2021	Kincheloe, Connor	2.7	\$ -	Data Gathering & Processing	L130	Reviewing updates to claims-level data processing scripts	\$ 475.00	\$ 1,282.50
6/24/2021	Kincheloe, Connor	1.2	\$ -	Data Gathering & Processing	L130	QC of updates to claims data processing	\$ 475.00	\$ 570.00
6/25/2021	Kincheloe, Connor	2.2	\$ -	Data Gathering & Processing	L130	QC of updates to claims data processing code	\$ 475.00	\$ 1,045.00
6/2/2021	Miller, Justin	0.9	\$ -	Data Gathering & Processing	L130	Reviewed data processing code	\$ 375.00	\$ 337.50
6/3/2021	Miller, Justin	1.3	\$ -	Data Gathering & Processing	L130	Continued updating claims data processing scripts	\$ 375.00	\$ 487.50
6/3/2021	Miller, Justin	1.9	\$ -	Data Gathering & Processing	L130	Updated claims data processing scripts	\$ 375.00	\$ 712.50
6/4/2021	Miller, Justin	1.6	\$ -	Data Gathering & Processing	L130	Reviewed claims data processing code and scripts	\$ 375.00	\$ 600.00
6/4/2021	Miller, Justin	2.2	\$ -	Data Gathering & Processing	L130	Continued reviewing claims data processing code and scripts	\$ 375.00	\$ 825.00
6/7/2021	Miller, Justin	2.7	\$ -	Data Gathering & Processing	L130	Updates to claims data processing scripts	\$ 375.00	\$ 1,012.50
6/8/2021	Miller, Justin	2.8	\$ -	Data Gathering & Processing	L130	Reviewed data processing scripts and code	\$ 375.00	\$ 1,050.00
6/9/2021	Miller, Justin	0.7	\$ -	Data Gathering & Processing	L130	QC of updates to scripts for claims data processing	\$ 375.00	\$ 262.50
6/9/2021	Miller, Justin	2.4	\$ -	Data Gathering & Processing	L130	Updates to scripts for claims data processing	\$ 375.00	\$ 900.00
6/10/2021	Miller, Justin	1.6	\$ -	Data Gathering & Processing	L130	QC of data processing scripts and code	\$ 375.00	\$ 600.00
6/10/2021	Miller, Justin	1.1	\$ -	Data Gathering & Processing	L130	Continued QC of data processing scripts and code	\$ 375.00	\$ 412.50
6/11/2021	Miller, Justin	2.2	\$ -	Data Gathering & Processing	L130	Code updates for claims data processing	\$ 375.00	\$ 825.00
6/14/2021	Miller, Justin	2.8	\$ -	Data Gathering & Processing	L130	Review of claims data processing scripts	\$ 375.00	\$ 1,050.00
6/14/2021	Miller, Justin	0.9	\$ -	Data Gathering & Processing	L130	QC of claims data processing scripts	\$ 375.00	\$ 337.50
6/14/2021	Miller, Justin	2.1	\$ -	Data Gathering & Processing	L130	Continued review of claims data processing scripts	\$ 375.00	\$ 787.50
6/15/2021	Miller, Justin	2.6	\$ -	Data Gathering & Processing	L130	QC of scripts for processing of claims data	\$ 375.00	\$ 975.00
6/15/2021	Miller, Justin	0.8	\$ -	Data Gathering & Processing	L130	Continued QC of scripts for processing of claims data	\$ 375.00	\$ 300.00
6/16/2021	Miller, Justin	0.6	\$ -	Data Gathering & Processing	L130	Continued QC of data processing code	\$ 375.00	\$ 225.00
6/16/2021	Miller, Justin	2.7	\$ -	Data Gathering & Processing	L130	QC of data processing code	\$ 375.00	\$ 1,012.50
6/18/2021	Miller, Justin	1.3	\$ -	Data Gathering & Processing	L130	QC of claims data processing code	\$ 375.00	\$ 487.50

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
6/21/2021	Miller, Justin	2.4	\$ -	Data Gathering & Processing	L130	Updates to claims data processing code	\$ 375.00	\$ 900.00
6/22/2021	Miller, Justin	2.1	\$ -	Data Gathering & Processing	L130	QC of scripts for processing of claims data	\$ 375.00	\$ 787.50
6/22/2021	Miller, Justin	1.1	\$ -	Data Gathering & Processing	L130	Continued QC of scripts for processing of claims data	\$ 375.00	\$ 412.50
6/23/2021	Miller, Justin	2.6	\$ -	Data Gathering & Processing	L130	Claims data processing scripts QC	\$ 375.00	\$ 975.00
6/24/2021	Miller, Justin	2.3	\$ -	Data Gathering & Processing	L130	Reviewed code for claims data scripts and processing	\$ 375.00	\$ 862.50
6/25/2021	Miller, Justin	2.7	\$ -	Data Gathering & Processing	L130	QC of processing code for claims data	\$ 375.00	\$ 1,012.50
6/25/2021	Miller, Justin	0.4	\$ -	Data Gathering & Processing	L130	Continued QC of processing code for claims data	\$ 375.00	\$ 150.00
6/28/2021	Miller, Justin	0.7	\$ -	Data Gathering & Processing	L130	QC of scripts for claims data processing	\$ 375.00	\$ 262.50
6/29/2021	Miller, Justin	1.9	\$ -	Data Gathering & Processing	L130	Updates to claims data processing scripts	\$ 375.00	\$ 712.50
6/29/2021	Miller, Justin	1.1	\$ -	Data Gathering & Processing	L130	Continued updates to claims data processing scripts	\$ 375.00	\$ 412.50
6/30/2021	Miller, Justin	2.1	\$ -	Data Gathering & Processing	L130	Code updates to claims data processing scripts	\$ 375.00	\$ 787.50
6/1/2021	Sherman, Catherine	2.3	\$ -	Data Gathering & Processing	L130	Analyzed publicly sourced verdict information	\$ 375.00	\$ 862.50
6/1/2021	Sherman, Catherine	1.4	\$ -	Data Gathering & Processing	L130	Updated trial information from public articles	\$ 375.00	\$ 525.00
6/2/2021	Sherman, Catherine	2.6	\$ -	Data Gathering & Processing	L130	Assessed information from publicly sourced verdict data	\$ 375.00	\$ 975.00
6/2/2021	Sherman, Catherine	0.7	\$ -	Data Gathering & Processing	L130	Collected publicly available data	\$ 375.00	\$ 262.50
6/3/2021	Sherman, Catherine	2.9	\$ -	Data Gathering & Processing	L130	Evaluated publicly sourced information	\$ 375.00	\$ 1,087.50
6/3/2021	Sherman, Catherine	1.4	\$ -	Data Gathering & Processing	L130	Tabulated fields in publicly available data	\$ 375.00	\$ 525.00
6/4/2021	Sherman, Catherine	1.3	\$ -	Data Gathering & Processing	L130	Documented information from publicly available data	\$ 375.00	\$ 487.50
6/4/2021	Sherman, Catherine	1.2	\$ -	Data Gathering & Processing	L130	Researched trial outcomes in publicly sourced articles	\$ 375.00	\$ 450.00
6/7/2021	Sherman, Catherine	3.1	\$ -	Data Gathering & Processing	L130	Analyzed publicly available information	\$ 375.00	\$ 1,162.50
6/7/2021	Sherman, Catherine	2.6	\$ -	Data Gathering & Processing	L130	Collected and recorded publicly sourced data	\$ 375.00	\$ 975.00
6/9/2021	Sherman, Catherine	2.2	\$ -	Data Gathering & Processing	L130	Evaluated publicly sourced information and data	\$ 375.00	\$ 825.00
6/9/2021	Sherman, Catherine	1.7	\$ -	Data Gathering & Processing	L130	Assessed publicly available data	\$ 375.00	\$ 637.50
6/10/2021	Sherman, Catherine	2.6	\$ -	Data Gathering & Processing	L130	Documented publicly sourced verdict data	\$ 375.00	\$ 975.00
6/10/2021	Sherman, Catherine	1.9	\$ -	Data Gathering & Processing	L130	Reviewed trial information from public sources and QC data	\$ 375.00	\$ 712.50
6/11/2021	Sherman, Catherine	1.3	\$ -	Data Gathering & Processing	L130	Researched verdict outcomes in publicly sourced articles	\$ 375.00	\$ 487.50
6/11/2021	Sherman, Catherine	2.7	\$ -	Data Gathering & Processing	L130	Recorded public data for asbestos cases	\$ 375.00	\$ 1,012.50
6/14/2021	Sherman, Catherine	2.4	\$ -	Data Gathering & Processing	L130	Analyzed information from publicly sourced data	\$ 375.00	\$ 900.00
6/14/2021	Sherman, Catherine	2.1	\$ -	Data Gathering & Processing	L130	Evaluated relevant variables in publicly available data	\$ 375.00	\$ 787.50
6/15/2021	Sherman, Catherine	1.6	\$ -	Data Gathering & Processing	L130	Collected information from publicly sourced articles	\$ 375.00	\$ 600.00
6/15/2021	Sherman, Catherine	2.8	\$ -	Data Gathering & Processing	L130	Updated publicly available data	\$ 375.00	\$ 1,050.00
6/16/2021	Sherman, Catherine	1.9	\$ -	Data Gathering & Processing	L130	Assessed publicly sourced information	\$ 375.00	\$ 712.50
6/18/2021	Sherman, Catherine	2.3	\$ -	Data Gathering & Processing	L130	Recorded verdict information from publicly sourced articles	\$ 375.00	\$ 862.50
6/21/2021	Sherman, Catherine	1.1	\$ -	Data Gathering & Processing	L130	Documented publicly sourced verdict information	\$ 375.00	\$ 412.50
6/21/2021	Sherman, Catherine	3.1	\$ -	Data Gathering & Processing	L130	Analyzed publicly available verdict data	\$ 375.00	\$ 1,162.50
6/22/2021	Sherman, Catherine	1.6	\$ -	Data Gathering & Processing	L130	Calculated fields for publicly sourced verdict data	\$ 375.00	\$ 600.00
6/22/2021	Sherman, Catherine	2.1	\$ -	Data Gathering & Processing	L130	Updated publicly available verdict information	\$ 375.00	\$ 787.50



Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
6/23/2021	Sherman, Catherine	2.7	\$ -	Data Gathering & Processing	L130	Evaluated publicly sourced data	\$ 375.00	\$ 1,012.50
6/23/2021	Sherman, Catherine	1.3	\$ -	Data Gathering & Processing	L130	Researched publicly available data	\$ 375.00	\$ 487.50
6/24/2021	Sherman, Catherine	2.2	\$ -	Data Gathering & Processing	L130	Recorded publicly sourced data	\$ 375.00	\$ 825.00
6/24/2021	Sherman, Catherine	1.1	\$ -	Data Gathering & Processing	L130	Tabulated relevant variables in public trial data	\$ 375.00	\$ 412.50
6/25/2021	Sherman, Catherine	1.9	\$ -	Data Gathering & Processing	L130	Collected publicly available trial information	\$ 375.00	\$ 712.50
6/25/2021	Sherman, Catherine	2.8	\$ -	Data Gathering & Processing	L130	Assessed verdict outcomes in publicly sourced articles	\$ 375.00	\$ 1,050.00
6/28/2021	Sherman, Catherine	2.4	\$ -	Data Gathering & Processing	L130	Analyzed publicly sourced information and data	\$ 375.00	\$ 900.00
6/28/2021	Sherman, Catherine	1.7	\$ -	Data Gathering & Processing	L130	Evaluated data from public articles	\$ 375.00	\$ 637.50
6/29/2021	Sherman, Catherine	2.9	\$ -	Data Gathering & Processing	L130	Updated fields in publicly sourced data	\$ 375.00	\$ 1,087.50
6/29/2021	Sherman, Catherine	1.3	\$ -	Data Gathering & Processing	L130	Documented publicly available verdict information	\$ 375.00	\$ 487.50
6/30/2021	Sherman, Catherine	2.8	\$ -	Data Gathering & Processing	L130	Recorded publicly sourced data	\$ 375.00	\$ 1,050.00
6/30/2021	Sherman, Catherine	1.2	\$ -	Data Gathering & Processing	L130	Calculated variables for publicly available verdict data	\$ 375.00	\$ 450.00
6/1/2021	Shim, Michelle	2.4	\$ -	Data Analysis	L130	QCing and updating matching code for DBMP claims	\$ 350.00	\$ 840.00
6/1/2021	Shim, Michelle	2.3	\$ -	Data Analysis	L130	Continued QCing and updating matching code for DBMP claims	\$ 350.00	\$ 805.00
6/1/2021	Shim, Michelle	1.4	\$ -	Data Analysis	L130	Tabulating publicly available data	\$ 350.00	\$ 490.00
6/2/2021	Shim, Michelle	1.3	\$ -	Data Analysis	L130	Continued tabulating publicly available data for claim matching	\$ 350.00	\$ 455.00
6/2/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Preparing public data to match with DBMP claims	\$ 350.00	\$ 910.00
6/2/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Continued preparing public data to match with DBMP claims	\$ 350.00	\$ 735.00
6/2/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Working on public data matching code with claims	\$ 350.00	\$ 630.00
6/2/2021	Shim, Michelle	0.7	\$ -	Data Gathering & Processing	L130	Reviewing progress on claimant-level grouping code	\$ 350.00	\$ 245.00
6/3/2021	Shim, Michelle	2.6	\$ -	Data Analysis	L130	QCing public data matching results for DBMP claims	\$ 350.00	\$ 910.00
6/3/2021	Shim, Michelle	1.8	\$ -	Data Analysis	L130	Continued working on public data analysis	\$ 350.00	\$ 630.00
6/3/2021	Shim, Michelle	2.5	\$ -	Data Analysis	L130	Continued QCing public data matching results for claims	\$ 350.00	\$ 875.00
6/3/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Reviewing and updating matching code with public data	\$ 350.00	\$ 770.00
6/4/2021	Shim, Michelle	1.6	\$ -	Data Gathering & Processing	L130	Continued reviewing and updating matching code with public data	\$ 350.00	\$ 560.00
6/4/2021	Shim, Michelle	2.3	\$ -	Data Analysis	L130	Updating claims matching code with public data	\$ 350.00	\$ 805.00
6/4/2021	Shim, Michelle	1.8	\$ -	Data Analysis	L130	Continued updating claims with public data	\$ 350.00	\$ 630.00
6/4/2021	Shim, Michelle	2.4	\$ -	Data Analysis	L130	Tabulating matches between claims data and public data	\$ 350.00	\$ 840.00
6/7/2021	Shim, Michelle	2.3	\$ -	Data Analysis	L130	Preparing claimant-level information for DBMP claims data	\$ 350.00	\$ 805.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
6/7/2021	Shim, Michelle	1.7	\$ -	Data Analysis	L130	Continued preparing claimant-level information for claims	\$ 350.00	\$ 595.00
6/7/2021	Shim, Michelle	2.6	\$ -	Data Analysis	L130	QCing claimant-level information review for claim analysis	\$ 350.00	\$ 910.00
6/8/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Updating claim-level prioritization code for claim grouping	\$ 350.00	\$ 875.00
6/8/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Continued updating claimant-level prioritization code for claim grouping	\$ 350.00	\$ 735.00
6/8/2021	Shim, Michelle	2.3	\$ -	Data Analysis	L130	Reviewing publicly available data for DBMP claimants	\$ 350.00	\$ 805.00
6/8/2021	Shim, Michelle	2.2	\$ -	Data Analysis	L130	Updating public claims data processing for DBMP claimant analysis	\$ 350.00	\$ 770.00
6/9/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	QCing claimant-level groups for reconciliation code	\$ 350.00	\$ 805.00
6/9/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Continued QCing claimant-level groups for reconciliation code	\$ 350.00	\$ 735.00
6/9/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Updating claimant-level processing for public data	\$ 350.00	\$ 630.00
6/10/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Updating claim-level prioritization code across data sources	\$ 350.00	\$ 910.00
6/10/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Continued updating claim-level prioritization code across data sources	\$ 350.00	\$ 630.00
6/10/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	QCing claim-level prioritization code for public data	\$ 350.00	\$ 840.00
6/11/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Updating public data claimant-level prioritized groupings	\$ 350.00	\$ 840.00
6/11/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Continued QCing claim-level prioritization code for public data	\$ 350.00	\$ 630.00
6/11/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Processing claimant-level data for DBMP claims	\$ 350.00	\$ 595.00
6/14/2021	Shim, Michelle	2.2	\$ -	Data Analysis	L130	Tabulating claimant-level data for DBMP claims	\$ 350.00	\$ 770.00
6/14/2021	Shim, Michelle	1.8	\$ -	Data Analysis	L130	Continued tabulating claimant-level data for DBMP claims	\$ 350.00	\$ 630.00
6/14/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Continued updating public data claimant-level processing	\$ 350.00	\$ 910.00
6/15/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued updating code with claim-level prioritization	\$ 350.00	\$ 805.00
6/15/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Updating grouping code with claim-level prioritization	\$ 350.00	\$ 735.00
6/15/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	QCing and reviewing prioritized claimant-level groupings	\$ 350.00	\$ 595.00
6/16/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued QCing and reviewing prioritized claimant-level groupings	\$ 350.00	\$ 805.00
6/16/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Updating mapping code for claimant-level data processing	\$ 350.00	\$ 735.00



Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
6/16/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Continued updating mapping code for claimant-level processing	\$ 350.00	\$ 630.00
6/17/2021	Shim, Michelle	1.4	\$ -	Data Gathering & Processing	L130	QCing public claims data grouping code updates	\$ 350.00	\$ 490.00
6/17/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Continued QCing public claims data processing code updates	\$ 350.00	\$ 595.00
6/18/2021	Shim, Michelle	1.4	\$ -	Data Gathering & Processing	L130	Continued reviewing claim-level data processing and standardization	\$ 350.00	\$ 490.00
6/18/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Reviewing and updating claim-level data processing and standardization	\$ 350.00	\$ 770.00
6/21/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	QCing and updating claimant-level data processing	\$ 350.00	\$ 770.00
6/21/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Continued QCing and updating claimant-level data processing	\$ 350.00	\$ 735.00
6/22/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Reviewing and tabulating claim-level public data	\$ 350.00	\$ 630.00
6/23/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Preparing tabulations of public claim-level data	\$ 350.00	\$ 770.00
6/23/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Updating claim prioritization for claimant-level processing	\$ 350.00	\$ 595.00
6/24/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	QCing claim-level data processing	\$ 350.00	\$ 595.00
6/24/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Continued updating prioritization for claimant-level processing code	\$ 350.00	\$ 840.00
6/25/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued QCing claim-level data processing	\$ 350.00	\$ 805.00
6/25/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Reviewing claim status processing for public data grouping code	\$ 350.00	\$ 630.00
6/28/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued reviewing claim status processing for public data grouping code	\$ 350.00	\$ 770.00
6/28/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Updating claimant-level data processing	\$ 350.00	\$ 840.00
6/28/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Continued updating claimant-level data processing	\$ 350.00	\$ 595.00
6/29/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Reviewing code structure and processing	\$ 350.00	\$ 840.00
6/29/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued reviewing code structure and criteria	\$ 350.00	\$ 770.00
6/30/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Updating claimant-level data prioritization for grouping code	\$ 350.00	\$ 770.00
6/30/2021	Shim, Michelle	1.9	\$ -	Data Gathering & Processing	L130	Continued updating claimant-level data prioritization for grouping code	\$ 350.00	\$ 665.00
6/30/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	QCing and reviewing claimant-level data processing	\$ 350.00	\$ 630.00
6/2/2021	Sun, Phyllis	0.7	\$ -	Data Gathering & Processing	L130	Review the data fields collected from publicly-available trial articles	\$ 585.00	\$ 409.50
6/29/2021	Sun, Phyllis	0.6	\$ -	Data Gathering & Processing	L130	Review progress on data collection task from publicly-available documents about trials	\$ 585.00	\$ 351.00
6/2/2021	Xu, Alicia	0.4	\$ -	Data Gathering & Processing	L130	Update on general case and task status	\$ 485.00	\$ 194.00
6/9/2021	Xu, Alicia	0.4	\$ -	Data Gathering & Processing	L130	Case and task updates	\$ 485.00	\$ 194.00
6/25/2021	Xu, Alicia	0.4	\$ -	Data Gathering & Processing	L130	Review status for tasks and case	\$ 485.00	\$ 194.00

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re

DBMP LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**EIGHTEENTH MONTHLY STATEMENT OF FEES AND EXPENSES  
INCURRED BY BATES WHITE LLC AS ASBESTOS CONSULTANTS FOR THE  
DEBTOR FOR  
THE PERIOD FROM JULY 1, 2021 THROUGH JULY 31, 2021**

In accordance with the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 402) (the “Amended Interim Compensation Order”), Bates White LLC (“BW”), Asbestos Consultants to DBMP LLC as debtor and debtor in possession (the “Debtor”), submits its *Eighteenth Monthly Statement of Fees and Expenses Incurred by Bates White LLC as Asbestos Consultants for the Debtor for the Period From July 1, 2021 through July 31, 2021* (the “Monthly Fee Statement”).

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A is BW’s invoice for the period July 1, 2021 through July 31, 2021 (the “Statement Period”). Exhibit B provides the time entry detail for services rendered by BW during the Statement Period.

**Total Fees and Expenses For the Statement Period**

2. The total amounts of fees and expenses incurred by BW during the Statement Period are as follows:

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

Total Fees	\$124,152.50
Total Expenses	\$0.00
<b>TOTAL</b>	<b>\$124,152.50</b>

3. Pursuant to BW's agreement with Debtor, provided BW receives payment of the majority of its monthly invoice within 30 days of presentation, BW will apply a prompt payment discount of 5% to its fees. Further, pursuant to the Amended Interim Compensation Order, BW may seek payment from the Debtor for the Statement Period (the "Interim Amount"), representing (a) 90% of BW's fees and (b) 100% of its incurred expenses. With no prompt pay discount, BW's total amount for this Monthly Statement is \$124,152.50 and BW's Interim Amount for this Monthly Fee Statement is \$111,737.25, which represents 90% of BW's fees and \$0.00 in incurred expenses in the Statement Period; these amounts would leave a holdback amount of \$12,415.25. However, should BW receive payment within 30 days of the date of this invoice, BW would apply a 5% prompt pay discount to its fees resulting in a total amount for this Monthly Statement of \$117,944.88 and an Interim Amount for this Monthly Fee Statement of \$106,150.39, which represents 90% of BW's fees and \$0.00 in incurred expenses in the Statement Period; these amounts would leave a holdback amount of \$11,794.49.

4. Cumulative holdback analysis. The holdback amounts carried forward are the following:

<b>Statement Period</b>	<b>Hold-back Amount*</b>
May 1 - May 31, 2021	\$18,579.77
June 1 - June 30, 2021	\$16,395.72
July 1 - July 31, 2021	\$11,794.49 (\$12,415.25)
<b>Total</b>	<b>\$46,769.98 (\$47,390.74)</b>

\* Figures in parenthesis represent amounts with no prompt pay discount to BW's fees.

**Notice and Objection Procedures**

In accordance with the Amended Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtor, DBMP LLC, 20 Moores Road, Malvern, Pennsylvania 19355 (Attn: Michael T. Starczewski, Esq., dbmp@saint-gobain.com); (b) the Debtor’s Counsel, (I) Jones Day, 1420 Peachtree Street, N.E., Suite 800, Atlanta, Georgia 30309 (Attn: Jeffrey B. Ellman, Esq., jbellman@jonesday.com; Danielle Barav-Johnson, Esq., dbarav@jonesday.com); and (II) Robinson, Bradshaw & Hinson, P.A., 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246 (Attn: Garland S. Cassada, Esq., gcassada@robinsonbradshaw.com); (c) the office of the United States Bankruptcy Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., shelley\_abel@ncwba.uscourts.gov); and (d) counsel to the Debtor’s non-debtor affiliate, CertainTeed LLC, Goodwin Procter LLP, 1900 N Street NW, Washington, District of Columbia 20036 (Attn: Richard M. Wyner, Esq., rwyner@goodwinlaw.com); (e) proposed counsel to the Official Committee of Asbestos Personal Injury Claimants, (I) Caplin & Drysdale, Chartered, One Thomas Circle NW, Suite 1100, Washington, District of Columbia 20005 (Kevin C. Maclay, Esq., kmaclay@capdale.com; James P. Wehner, Esq., jwehner@capdale.com; Todd E. Phillips, Esq., tphillips@capdale.com); (II) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie Ramsey, Esq., nramsey@rc.com; Davis Wright, Esq., dwright@rc.com); and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., gthompson@lawhssm.com).

5. Pursuant to the Amended Interim Compensation Order, objections to this Monthly Fee Statement (each, an “Objection”), if any, must be served upon the Notice Parties, including

BW, no later than 14 days after this Monthly Fee Statement's date (the "Objection Deadline").

Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtor will be authorized to pay BW an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection. As noted above, these amounts will be drawn from BW's retainer consistent with paragraph 3(f) of the Amended Interim Compensation Order.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by BW at a later date.

Dated: September 8, 2021  
Washington, DC

Respectfully submitted,

/s/ Jorge Gallardo-Garcia

Jorge Gallardo-Garcia, PhD

Partner

BATES WHITE LLC

2001 K Street NW, North Building, Suite 500

Washington, DC 20006

Telephone: (202) 408-6110

Facsimile: (202) 408-7838

E-mail: [jorge.gallardogarcia@bateswhite.com](mailto:jorge.gallardogarcia@bateswhite.com)

ASBESTOS CONSULTANTS FOR DEBTOR  
AND DEBTOR IN POSSESSION

**EXHIBIT A**

**Bates White LLC Invoice**

In Account With  
Bates White LLC  
Washington, DC  
2001 K Street NW, North Building, Suite 500  
Washington, DC 20006  
(202) 408-6110

September 8, 2021

DBMP LLC  
c/o Leslie Dallas  
20 Moores Road  
Malvern, PA 19355

For consulting services rendered for the period July 1, 2021 through July 31, 2021:

**INTERIM AMOUNT AT STANDARD RATES AND PROMPT PAY DISCOUNT RATES**

Concept	No prompt pay discount	With prompt pay discount
Total Fees	\$124,152.50	\$124,152.50
5% Prompt Payment Discount*	\$0.00	\$6,207.63
10% Hold-Back Amount	\$12,415.25	\$11,794.49
Total Disbursements & Charges	\$0.00	\$0.00
<b>TOTAL INTERIM AMOUNT PAYABLE</b>	<b>\$111,737.25</b>	<b>\$106,150.39</b>

\* Fees subject to a 5% prompt pay discount, per the terms Bates White negotiated with the Debtor, provided Bates White receives payment for its Interim Amount within 30 days of submitting its invoice.

Bates White LLC

**SUMMARY BY CATEGORY**  
**July 1 through July 31, 2021**

Category	Billing Code	Billed Hours	Total Fees*
Analysis	L120	30.2	\$30,133.00
Client Communication	L130	5.3	\$4,745.00
Data Analysis	L130	8.5	\$5,087.50
Data Gathering & Processing	L130	193.8	\$77,769.50
Fee Request Preparation	B160	5.1	\$2,887.50
Project Management	L130	4.1	\$3,530.00
Total Fees		247.0	\$124,152.50
Total Disbursements & Charges			\$0.00
<b>TOTAL</b>			<b>\$124,152.50</b>

\* Total Fees based on standard rates without prompt pay discount.



Bates White LLC

**FEE SUMMARY BY TIMEKEEPER**  
**July 1 through July 31, 2021**

Timekeeper Name	Title	Billed Hours	Billing Rate*	Total Fees*
Bates, Charles	Partner	19.4	\$1,250.00	\$24,250.00
Mullin, Charles	Partner	0.5	\$1,025.00	\$512.50
Gallardo-Garcia, Jorge	Partner	17.9	\$850.00	\$15,215.00
Johnson, Samantha	Manager	1.5	\$485.00	\$727.50
Kincheloe, Connor	Manager	66.2	\$475.00	\$31,445.00
Sun, Phyllis	Manager	2.4	\$585.00	\$1,404.00
Xu, Alicia	Senior Economist	0.8	\$485.00	\$388.00
Calder, Sara	Consultant II	23.9	\$395.00	\$9,440.50
Miller, Justin	Consultant II	27.4	\$375.00	\$10,275.00
Sherman, Catherine	Consultant II	1.8	\$375.00	\$675.00
Shim, Michelle	Consultant I	85.2	\$350.00	\$29,820.00
<b>TOTAL</b>		<b>247.0</b>		<b>\$124,152.50</b>

\* Billing Rates and Total Fees based on standard rates without prompt pay discount.

Bates White LLC

**DISBURSEMENT SUMMARY**  
**July 1 through July 31, 2021**

Category	Expenses
Research	\$0.00
Travel	\$0.00
Meals	\$0.00
Vendor costs	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>

**EXHIBIT B**

**Bates White LLC Time Detail**

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
7/2/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 1,875.00
7/6/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Continued work on liability analysis	\$ 1,250.00	\$ 1,875.00
7/7/2021	Bates, Charles	0.3	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 375.00
7/13/2021	Bates, Charles	0.7	\$ -	Analysis	L120	Work on liability modeling and analysis	\$ 1,250.00	\$ 875.00
7/14/2021	Bates, Charles	1.0	\$ -	Client Communication	L130	Confer with counsel on next steps	\$ 1,250.00	\$ 1,250.00
7/19/2021	Bates, Charles	0.2	\$ -	Client Communication	L130	Confer with counsel Cassada and Gordon regarding next steps	\$ 1,250.00	\$ 250.00
7/19/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 1,875.00
7/21/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 625.00
7/21/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Continued review of liability analysis	\$ 1,250.00	\$ 1,875.00
7/26/2021	Bates, Charles	0.4	\$ -	Client Communication	L130	Call with counsel Cassada, Gordon, and Worf, and Gallardo-Garcia on next steps for case.	\$ 1,250.00	\$ 500.00
7/26/2021	Bates, Charles	0.8	\$ -	Analysis	L120	Review motion and Peterson declaration	\$ 1,250.00	\$ 1,000.00
7/27/2021	Bates, Charles	3.0	\$ -	Analysis	L120	Attend Peterson deposition	\$ 1,250.00	\$ 3,750.00
7/27/2021	Bates, Charles	3.0	\$ -	Analysis	L120	Attend Peterson deposition, cont.	\$ 1,250.00	\$ 3,750.00
7/27/2021	Bates, Charles	1.0	\$ -	Analysis	L120	Analyze Peterson deposition	\$ 1,250.00	\$ 1,250.00
7/28/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 625.00
7/28/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Work on data analysis	\$ 1,250.00	\$ 1,875.00
7/29/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Review project progress	\$ 1,250.00	\$ 625.00
7/6/2021	Calder, Sara	1.1	\$ -	Data Gathering & Processing	L130	Update documentation on publicly sourced trust data	\$ 395.00	\$ 434.50
7/7/2021	Calder, Sara	1.4	\$ -	Data Gathering & Processing	L130	Review and update processing methodology for public verdicts data	\$ 395.00	\$ 553.00
7/8/2021	Calder, Sara	1.3	\$ -	Data Gathering & Processing	L130	Analyze processing of public data	\$ 395.00	\$ 513.50
7/9/2021	Calder, Sara	1.3	\$ -	Data Gathering & Processing	L130	Review public data processing methodology	\$ 395.00	\$ 513.50
7/12/2021	Calder, Sara	0.2	\$ -	Data Gathering & Processing	L130	Review public trust data work stream	\$ 395.00	\$ 79.00
7/14/2021	Calder, Sara	0.6	\$ -	Data Gathering & Processing	L130	Review updates to public data processing scripts	\$ 395.00	\$ 237.00
7/15/2021	Calder, Sara	1.1	\$ -	Data Gathering & Processing	L130	Continue to QC and update public data	\$ 395.00	\$ 434.50
7/15/2021	Calder, Sara	2.3	\$ -	Data Gathering & Processing	L130	QC and update publicly sourced data	\$ 395.00	\$ 908.50
7/16/2021	Calder, Sara	2.4	\$ -	Data Gathering & Processing	L130	Update processing of public verdicts data	\$ 395.00	\$ 948.00
7/16/2021	Calder, Sara	1.1	\$ -	Data Gathering & Processing	L130	Continue to update public verdicts data processing	\$ 395.00	\$ 434.50
7/19/2021	Calder, Sara	1.2	\$ -	Data Gathering & Processing	L130	Review public trust data	\$ 395.00	\$ 474.00
7/20/2021	Calder, Sara	1.5	\$ -	Data Gathering & Processing	L130	Review and process public data	\$ 395.00	\$ 592.50
7/21/2021	Calder, Sara	1.4	\$ -	Data Gathering & Processing	L130	Process publicly available data	\$ 395.00	\$ 553.00
7/22/2021	Calder, Sara	1.4	\$ -	Data Gathering & Processing	L130	Process publicly available data, cont.	\$ 395.00	\$ 553.00
7/23/2021	Calder, Sara	1.3	\$ -	Data Gathering & Processing	L130	Continue processing amount variables in claim level data	\$ 395.00	\$ 513.50
7/23/2021	Calder, Sara	0.7	\$ -	Data Gathering & Processing	L130	QC processing of publicly sourced data	\$ 395.00	\$ 276.50
7/26/2021	Calder, Sara	1.7	\$ -	Data Gathering & Processing	L130	Process public verdicts data	\$ 395.00	\$ 671.50
7/27/2021	Calder, Sara	1.2	\$ -	Data Gathering & Processing	L130	Update public data input files	\$ 395.00	\$ 474.00
7/30/2021	Calder, Sara	0.7	\$ -	Data Gathering & Processing	L130	Update public data workstream and next steps	\$ 395.00	\$ 276.50
7/7/2021	Gallardo-Garcia, Jorge	0.7	\$ -	Data Gathering & Processing	L130	Database processing status update; plan next steps for data collection.	\$ 850.00	\$ 595.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
7/12/2021	Gallardo-Garcia, Jorge	1.1	\$ -	Analysis	L120	Review documents from counsel.	\$ 850.00	\$ 935.00
7/13/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Fee Request Preparation	B160	Work on compensation request.	\$ 850.00	\$ 425.00
7/13/2021	Gallardo-Garcia, Jorge	0.8	\$ -	Analysis	L120	Review documents filed with court.	\$ 850.00	\$ 680.00
7/13/2021	Gallardo-Garcia, Jorge	0.8	\$ -	Data Analysis	L130	Review claims database and analyze resolved claims.	\$ 850.00	\$ 680.00
7/13/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Client Communication	L130	Call with counsel Ross on next steps for case.	\$ 850.00	\$ 170.00
7/14/2021	Gallardo-Garcia, Jorge	1.1	\$ -	Data Analysis	L130	Work on database and claims data analysis review.	\$ 850.00	\$ 935.00
7/15/2021	Gallardo-Garcia, Jorge	0.1	\$ -	Analysis	L120	Prep for client call.	\$ 850.00	\$ 85.00
7/15/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Client Communication	L130	Call with counsel Cassada, Gordon, and Kincheloe, and others to discuss case progress.	\$ 850.00	\$ 425.00
7/15/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Data Analysis	L130	Analyze historical claims data.	\$ 850.00	\$ 255.00
7/15/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Fee Request Preparation	B160	Work on monthly compensation request.	\$ 850.00	\$ 255.00
7/15/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Analysis	L120	Review summary of review of documents filed with court.	\$ 850.00	\$ 425.00
7/16/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Analysis	L120	Continue work on summary of review of document filed with court and data analysis.	\$ 850.00	\$ 510.00
7/21/2021	Gallardo-Garcia, Jorge	1.2	\$ -	Analysis	L120	Review document from counsel.	\$ 850.00	\$ 1,020.00
7/22/2021	Gallardo-Garcia, Jorge	1.1	\$ -	Analysis	L120	Review document from counsel and provide feedback.	\$ 850.00	\$ 935.00
7/22/2021	Gallardo-Garcia, Jorge	1.2	\$ -	Analysis	L120	Review case filings.	\$ 850.00	\$ 1,020.00
7/23/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Gathering & Processing	L130	Database processing status update.	\$ 850.00	\$ 340.00
7/23/2021	Gallardo-Garcia, Jorge	0.8	\$ -	Client Communication	L130	Call with counsel Cassada, Ellman, Crandall, with Kincheloe and others on next steps for case.	\$ 850.00	\$ 680.00
7/23/2021	Gallardo-Garcia, Jorge	0.8	\$ -	Analysis	L120	Review document from counsel.	\$ 850.00	\$ 680.00
7/26/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Client Communication	L130	Call with counsel Cassada, Gordon, and Worf, with Dr. Bates on next steps for case.	\$ 850.00	\$ 340.00
7/26/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Data Gathering & Processing	L130	Database processing status update.	\$ 850.00	\$ 255.00
7/27/2021	Gallardo-Garcia, Jorge	1.0	\$ -	Analysis	L120	Review statements from opposing expert.	\$ 850.00	\$ 850.00
7/28/2021	Gallardo-Garcia, Jorge	0.8	\$ -	Data Gathering & Processing	L130	Analytical database review and plan next steps.	\$ 850.00	\$ 680.00
7/28/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Data Analysis	L130	Analyze claims resolutions and expenses.	\$ 850.00	\$ 510.00
7/28/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Analysis	L120	Debrief opposing counsel deposition.	\$ 850.00	\$ 340.00
7/30/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Project Management	L130	Work on disclosure and send document to counsel.	\$ 850.00	\$ 425.00
7/30/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Fee Request Preparation	B160	Work on compensation request.	\$ 850.00	\$ 340.00
7/30/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Data Gathering & Processing	L130	Database processing review and plan next steps.	\$ 850.00	\$ 425.00
7/9/2021	Johnson, Samantha	0.3	\$ -	Fee Request Preparation	B160	Preparing for monthly application	\$ 485.00	\$ 145.50
7/20/2021	Johnson, Samantha	1.0	\$ -	Fee Request Preparation	B160	Updating fee application information	\$ 485.00	\$ 485.00
7/21/2021	Johnson, Samantha	0.2	\$ -	Fee Request Preparation	B160	Preparing monthly fee application draft	\$ 485.00	\$ 97.00
7/1/2021	Kincheloe, Connor	1.2	\$ -	Data Gathering & Processing	L130	Reviewing updates to claims data processing code	\$ 475.00	\$ 570.00
7/7/2021	Kincheloe, Connor	0.8	\$ -	Data Gathering & Processing	L130	Reviewing status of claims data processing	\$ 475.00	\$ 380.00
7/7/2021	Kincheloe, Connor	1.1	\$ -	Project Management	L130	Planning next steps for case analysis	\$ 475.00	\$ 522.50
7/8/2021	Kincheloe, Connor	2.7	\$ -	Data Gathering & Processing	L130	QC of updates to claims data processing	\$ 475.00	\$ 1,282.50
7/9/2021	Kincheloe, Connor	2.2	\$ -	Data Gathering & Processing	L130	QC of claims data processing	\$ 475.00	\$ 1,045.00
7/9/2021	Kincheloe, Connor	1.8	\$ -	Data Gathering & Processing	L130	Continued QC of claims data processing	\$ 475.00	\$ 855.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
7/12/2021	Kincheloe, Connor	1.2	\$ -	Fee Request Preparation	B160	Reviewing monthly time records	\$ 475.00	\$ 570.00
7/13/2021	Kincheloe, Connor	0.5	\$ -	Fee Request Preparation	B160	Reviewing monthly time records, cont.	\$ 475.00	\$ 237.50
7/13/2021	Kincheloe, Connor	1.1	\$ -	Analysis	L120	Reviewing case filings	\$ 475.00	\$ 522.50
7/13/2021	Kincheloe, Connor	1.4	\$ -	Data Gathering & Processing	L130	QC of claims data processing updates	\$ 475.00	\$ 665.00
7/14/2021	Kincheloe, Connor	2.1	\$ -	Analysis	L120	Reviewing court filings	\$ 475.00	\$ 997.50
7/14/2021	Kincheloe, Connor	2.7	\$ -	Data Gathering & Processing	L130	Reviewing claims data processing	\$ 475.00	\$ 1,282.50
7/15/2021	Kincheloe, Connor	0.5	\$ -	Client Communication	L130	Call with counsel Cassada, Gordon, and Gallardo-Garcia, and others to discuss case status	\$ 475.00	\$ 237.50
7/15/2021	Kincheloe, Connor	2.9	\$ -	Data Analysis	L130	Analyzing DBMP claims data	\$ 475.00	\$ 1,377.50
7/15/2021	Kincheloe, Connor	1.1	\$ -	Data Gathering & Processing	L130	QC and review of DBMP claims database structure	\$ 475.00	\$ 522.50
7/16/2021	Kincheloe, Connor	2.8	\$ -	Data Analysis	L130	Continued analysis of DBMP claims data	\$ 475.00	\$ 1,330.00
7/16/2021	Kincheloe, Connor	2.1	\$ -	Data Gathering & Processing	L130	Continued QC of claims data processing structure	\$ 475.00	\$ 997.50
7/19/2021	Kincheloe, Connor	2.0	\$ -	Data Gathering & Processing	L130	QC of claims-level data processing updates	\$ 475.00	\$ 950.00
7/19/2021	Kincheloe, Connor	2.5	\$ -	Data Gathering & Processing	L130	Continued QC of claims-level data processing updates	\$ 475.00	\$ 1,187.50
7/20/2021	Kincheloe, Connor	2.8	\$ -	Data Gathering & Processing	L130	Updating claims data structure and processing	\$ 475.00	\$ 1,330.00
7/20/2021	Kincheloe, Connor	2.7	\$ -	Data Gathering & Processing	L130	Updating claims data structure and processing, cont.	\$ 475.00	\$ 1,282.50
7/21/2021	Kincheloe, Connor	1.5	\$ -	Data Gathering & Processing	L130	QC of claims data processing updates	\$ 475.00	\$ 712.50
7/21/2021	Kincheloe, Connor	0.7	\$ -	Project Management	L130	Reviewing status of claims data processing and planning next steps	\$ 475.00	\$ 332.50
7/21/2021	Kincheloe, Connor	2.6	\$ -	Data Gathering & Processing	L130	Updating claims data processing and data structure	\$ 475.00	\$ 1,235.00
7/22/2021	Kincheloe, Connor	2.0	\$ -	Data Gathering & Processing	L130	Updating claim-level data processing scripts	\$ 475.00	\$ 950.00
7/22/2021	Kincheloe, Connor	2.6	\$ -	Data Gathering & Processing	L130	Updating claim-level data processing scripts, continued.	\$ 475.00	\$ 1,235.00
7/23/2021	Kincheloe, Connor	0.8	\$ -	Client Communication	L130	Call with counsel Cassada, Ellman, and others, and Gallardo-Garcia to discuss case analysis	\$ 475.00	\$ 380.00
7/23/2021	Kincheloe, Connor	1.4	\$ -	Analysis	L120	Reviewing documents from clients	\$ 475.00	\$ 665.00
7/23/2021	Kincheloe, Connor	2.0	\$ -	Data Gathering & Processing	L130	QC of claims data processing and updates	\$ 475.00	\$ 950.00
7/23/2021	Kincheloe, Connor	1.7	\$ -	Data Gathering & Processing	L130	Continued QC of claims data processing	\$ 475.00	\$ 807.50
7/26/2021	Kincheloe, Connor	2.4	\$ -	Data Gathering & Processing	L130	Updating claims data processing scripts	\$ 475.00	\$ 1,140.00
7/26/2021	Kincheloe, Connor	2.2	\$ -	Data Gathering & Processing	L130	Continued updating claims data processing	\$ 475.00	\$ 1,045.00
7/26/2021	Kincheloe, Connor	1.9	\$ -	Data Gathering & Processing	L130	QC of claims data processing structure	\$ 475.00	\$ 902.50
7/27/2021	Kincheloe, Connor	2.0	\$ -	Data Gathering & Processing	L130	QC of claims-level database	\$ 475.00	\$ 950.00
7/27/2021	Kincheloe, Connor	1.4	\$ -	Data Gathering & Processing	L130	Reviewing updates to claims-level database processing	\$ 475.00	\$ 665.00
7/27/2021	Kincheloe, Connor	0.7	\$ -	Fee Request Preparation	B160	Preparing monthly compensation request	\$ 475.00	\$ 332.50
7/31/2021	Kincheloe, Connor	2.1	\$ -	Data Gathering & Processing	L130	Updating claims data processing	\$ 475.00	\$ 997.50
7/1/2021	Miller, Justin	2.6	\$ -	Data Gathering & Processing	L130	Reviewed processing for claims data scripts	\$ 375.00	\$ 975.00
7/2/2021	Miller, Justin	2.1	\$ -	Data Gathering & Processing	L130	QC of code for claims data processing	\$ 375.00	\$ 787.50
7/7/2021	Miller, Justin	0.8	\$ -	Data Gathering & Processing	L130	Reviewed data processing code and updates	\$ 375.00	\$ 300.00
7/8/2021	Miller, Justin	2.2	\$ -	Data Gathering & Processing	L130	Continued QC of data processing code and scripts	\$ 375.00	\$ 825.00
7/8/2021	Miller, Justin	1.9	\$ -	Data Gathering & Processing	L130	QC of data processing code and scripts	\$ 375.00	\$ 712.50

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
7/9/2021	Miller, Justin	2.6	\$ -	Data Gathering & Processing	L130	Updated to scripts in claims data processing	\$ 375.00	\$ 975.00
7/12/2021	Miller, Justin	2.4	\$ -	Data Gathering & Processing	L130	Script updates for claims data processing	\$ 375.00	\$ 900.00
7/13/2021	Miller, Justin	1.1	\$ -	Data Gathering & Processing	L130	Updates to claims data processing code	\$ 375.00	\$ 412.50
7/14/2021	Miller, Justin	2.7	\$ -	Data Gathering & Processing	L130	Updated code for claims data processing scripts	\$ 375.00	\$ 1,012.50
7/14/2021	Miller, Justin	2.3	\$ -	Data Gathering & Processing	L130	Continued updating code for claims data processing scripts	\$ 375.00	\$ 862.50
7/15/2021	Miller, Justin	1.8	\$ -	Data Gathering & Processing	L130	Updated scripts and code for claims data processing	\$ 375.00	\$ 675.00
7/16/2021	Miller, Justin	1.6	\$ -	Data Gathering & Processing	L130	Script updates for claims data processing	\$ 375.00	\$ 600.00
7/16/2021	Miller, Justin	2.2	\$ -	Data Gathering & Processing	L130	Continued script updates for claims data processing	\$ 375.00	\$ 825.00
7/19/2021	Miller, Justin	1.1	\$ -	Data Gathering & Processing	L130	Script updates for processing of claims data	\$ 375.00	\$ 412.50
7/14/2021	Mullin, Charles	0.5	\$ -	Client Communication	L130	Call with counsel (Gordon) regarding discovery and Peterson declaration	\$ 1,025.00	\$ 512.50
7/1/2021	Sherman, Catherine	1.5	\$ -	Data Gathering & Processing	L130	Evaluated publicly sourced verdict information	\$ 375.00	\$ 562.50
7/12/2021	Sherman, Catherine	0.3	\$ -	Data Gathering & Processing	L130	Assessed publicly available trial information	\$ 375.00	\$ 112.50
7/1/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued QCing and reviewing claimant-level grouping results	\$ 350.00	\$ 805.00
7/1/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Updating claimant-level data prioritization and reconciliation code	\$ 350.00	\$ 630.00
7/1/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Continued updating claimant-level data prioritization and reconciliation code	\$ 350.00	\$ 735.00
7/1/2021	Shim, Michelle	1.2	\$ -	Data Gathering & Processing	L130	Updating claim-level information processing and standardization	\$ 350.00	\$ 420.00
7/2/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Continued updating claim-level information processing and standardization	\$ 350.00	\$ 910.00
7/2/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	QCing and updating claimant-level data summarization code	\$ 350.00	\$ 770.00
7/2/2021	Shim, Michelle	1.6	\$ -	Data Gathering & Processing	L130	Continued QCing and updating claimant-level data summarization code	\$ 350.00	\$ 560.00
7/6/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Updating merge code for grouped public claim-level data	\$ 350.00	\$ 805.00
7/6/2021	Shim, Michelle	1.9	\$ -	Data Gathering & Processing	L130	Continued updating merge code for grouped public claim-level data	\$ 350.00	\$ 665.00
7/6/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	QCing and reviewing merge code for grouped public claim-level data	\$ 350.00	\$ 840.00
7/7/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued QCing and reviewing merge code for grouped public claim-level data	\$ 350.00	\$ 805.00
7/7/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Reviewing claimant-level data merge and supplementation for grouped claims data	\$ 350.00	\$ 770.00
7/7/2021	Shim, Michelle	1.9	\$ -	Data Gathering & Processing	L130	Continued reviewing claimant-level data merge and supplementation for grouped claims data	\$ 350.00	\$ 665.00
7/8/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Updating post-grouping public claimant-level data supplementation code	\$ 350.00	\$ 805.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
7/8/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued updating post-grouping claimant-level data supplementation code	\$ 350.00	\$ 770.00
7/8/2021	Shim, Michelle	1.6	\$ -	Data Gathering & Processing	L130	Reviewing post-grouping public claim-level data merge code	\$ 350.00	\$ 560.00
7/9/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued reviewing post-grouping public claim-level data merge code	\$ 350.00	\$ 805.00
7/9/2021	Shim, Michelle	2.1	\$ -	Data Gathering & Processing	L130	Updating claim-level data supplementation code	\$ 350.00	\$ 735.00
7/9/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Continued updating claim-level data supplementation code	\$ 350.00	\$ 840.00
7/12/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Updating grouped public claim-level data processing and standardization	\$ 350.00	\$ 840.00
7/12/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued updating grouped public claim-level data processing and standardization	\$ 350.00	\$ 770.00
7/13/2021	Shim, Michelle	1.2	\$ -	Data Gathering & Processing	L130	Updating namings data supplementation for grouped claims data	\$ 350.00	\$ 420.00
7/13/2021	Shim, Michelle	1.0	\$ -	Data Gathering & Processing	L130	Updating namings data supplementation for grouped claims data, continued	\$ 350.00	\$ 350.00
7/13/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Continued updating namings data supplementation for grouped claims data	\$ 350.00	\$ 840.00
7/14/2021	Shim, Michelle	1.4	\$ -	Data Gathering & Processing	L130	QCing and reviewing namings data supplementation for grouped claims	\$ 350.00	\$ 490.00
7/14/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Updating public claimant-level data merge for grouped claims	\$ 350.00	\$ 805.00
7/14/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Continued updating public claimant-level data merge for grouped claims	\$ 350.00	\$ 595.00
7/15/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Updating claimant exposure data standardization and merging	\$ 350.00	\$ 595.00
7/15/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued QCing and reviewing namings data supplementation for grouped claims	\$ 350.00	\$ 770.00
7/15/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Updating claimant exposure data processing	\$ 350.00	\$ 840.00
7/15/2021	Shim, Michelle	1.6	\$ -	Data Gathering & Processing	L130	Continued updating claimant exposure data processing	\$ 350.00	\$ 560.00
7/16/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	QCing and updating public claim-level data supplementation code	\$ 350.00	\$ 770.00
7/16/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Continued updating claimant exposure data standardization and merging	\$ 350.00	\$ 875.00
7/16/2021	Shim, Michelle	1.3	\$ -	Data Gathering & Processing	L130	Continued QCing and updating public claim-level data supplementation code	\$ 350.00	\$ 455.00
7/19/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Updating public ballots data processing and merge	\$ 350.00	\$ 770.00
7/19/2021	Shim, Michelle	1.9	\$ -	Data Gathering & Processing	L130	Continued updating public ballots data processing and merge	\$ 350.00	\$ 665.00



Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
7/19/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	QCing claimant-level data grouping and prioritization scripts	\$ 350.00	\$ 840.00
7/19/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued QCing claimant-level data grouping and prioritization scripts	\$ 350.00	\$ 805.00
7/20/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	QCing and updating additional claim-level fields in analytical database	\$ 350.00	\$ 875.00
7/20/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Continued QCing and updating additional claim-level fields in analytical database	\$ 350.00	\$ 805.00
7/20/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Reviewing claimant-level groupings and merge for analytical database	\$ 350.00	\$ 630.00
7/21/2021	Shim, Michelle	1.6	\$ -	Data Gathering & Processing	L130	Continued reviewing claimant-level groupings and merge for analytical database	\$ 350.00	\$ 560.00
7/1/2021	Sun, Phyllis	0.4	\$ -	Data Gathering & Processing	L130	Update documentation on trial information from publicly available source	\$ 585.00	\$ 234.00
7/9/2021	Sun, Phyllis	0.8	\$ -	Analysis	L120	Review court filings	\$ 585.00	\$ 468.00
7/13/2021	Sun, Phyllis	0.3	\$ -	Data Gathering & Processing	L130	Review the compiling of publicly-available verdicts information work	\$ 585.00	\$ 175.50
7/15/2021	Sun, Phyllis	0.5	\$ -	Data Gathering & Processing	L130	Review progress on database updates	\$ 585.00	\$ 292.50
7/21/2021	Sun, Phyllis	0.4	\$ -	Data Gathering & Processing	L130	Review updates in public verdicts data processing	\$ 585.00	\$ 234.00
7/7/2021	Xu, Alicia	0.2	\$ -	Data Gathering & Processing	L130	Case and task updates	\$ 485.00	\$ 97.00
7/15/2021	Xu, Alicia	0.3	\$ -	Data Gathering & Processing	L130	Case update and task planning	\$ 485.00	\$ 145.50
7/28/2021	Xu, Alicia	0.3	\$ -	Data Gathering & Processing	L130	Case and task updates	\$ 485.00	\$ 145.50

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re

DBMP LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**NINETEENTH MONTHLY STATEMENT OF FEES AND EXPENSES  
INCURRED BY BATES WHITE LLC AS ASBESTOS CONSULTANTS FOR THE  
DEBTOR FOR  
THE PERIOD FROM AUGUST 1, 2021 THROUGH AUGUST 31, 2021**

In accordance with the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* (Docket No. 402) (the “Amended Interim Compensation Order”), Bates White LLC (“BW”), Asbestos Consultants to DBMP LLC as debtor and debtor in possession (the “Debtor”), submits its *Nineteenth Monthly Statement of Fees and Expenses Incurred by Bates White LLC as Asbestos Consultants for the Debtor for the Period From August 1, 2021 through August 31, 2021* (the “Monthly Fee Statement”).

**Itemization of Services Rendered and Expenses Incurred**

1. Attached hereto as Exhibit A is BW’s invoice for the period August 1, 2021 through August 31, 2021 (the “Statement Period”). Exhibit B provides the time entry detail for services rendered by BW during the Statement Period.

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

**Total Fees and Expenses For the Statement Period**

2. The total amounts of fees and expenses incurred by BW during the Statement Period are as follows:

Total Fees	\$118,076.00
Total Expenses	\$0.00
<b>TOTAL</b>	<b>\$118,076.00</b>

3. Pursuant to BW's agreement with Debtor, provided BW receives payment of the majority of its monthly invoice within 30 days of presentation, BW will apply a prompt payment discount of 5% to its fees. Further, pursuant to the Amended Interim Compensation Order, BW may seek payment from the Debtor for the Statement Period (the "Interim Amount"), representing (a) 90% of BW's fees and (b) 100% of its incurred expenses. With no prompt pay discount, BW's total amount for this Monthly Statement is \$118,076.00 and BW's Interim Amount for this Monthly Fee Statement is \$106,268.40, which represents 90% of BW's fees and \$0.00 in incurred expenses in the Statement Period; these amounts would leave a holdback amount of \$11,807.60. However, should BW receive payment within 30 days of the date of this invoice, BW would apply a 5% prompt pay discount to its fees resulting in a total amount for this Monthly Statement of \$112,172.20 and an Interim Amount for this Monthly Fee Statement of \$100,954.98, which represents 90% of BW's fees and \$0.00 in incurred expenses in the Statement Period; these amounts would leave a holdback amount of \$11,217.22.

4. Cumulative holdback analysis. The holdback amounts carried forward are the following:

Statement Period	Hold-back Amount*
May 1 - May 31,2021	\$18,579.77
June 1 - June 30, 2021	\$16,395.72
July 1 - July 31, 2021	\$11,794.49 (\$12,415.25)
August 1 - August 30, 2021	\$11,217.22 (\$11,807.60)
<b>Total</b>	<b>\$57,987.20 (\$59,198.34)</b>

\* Figures in parenthesis represent amounts with no prompt pay discount to BW's fees.

**Notice and Objection Procedures**

In accordance with the Amended Interim Compensation Order, notice of this Monthly Fee Statement has been served by e-mail upon the following parties (collectively, the “Notice Parties”): (a) the Debtor, DBMP LLC, 20 Moores Road, Malvern, Pennsylvania 19355 (Attn: Michael T. Starczewski, Esq., [dbmp@saint-gobain.com](mailto:dbmp@saint-gobain.com)); (b) the Debtor’s Counsel, (I) Jones Day, 1420 Peachtree Street, N.E., Suite 800, Atlanta, Georgia 30309 (Attn: Jeffrey B. Ellman, Esq., [jbellman@jonesday.com](mailto:jbellman@jonesday.com); Danielle Barav-Johnson, Esq., [dbarav@jonesday.com](mailto:dbarav@jonesday.com)); and (II) Robinson, Bradshaw & Hinson, P.A., 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246 (Attn: Garland S. Cassada, Esq., [gcassada@robinsonbradshaw.com](mailto:gcassada@robinsonbradshaw.com)); (c) the office of the United States Bankruptcy Administrator, 402 West Trade Street, Suite 200, Charlotte, North Carolina 28202 (Attn: Shelley K. Abel, Esq., [shelley\\_abel@ncwba.uscourts.gov](mailto:shelley_abel@ncwba.uscourts.gov)); and (d) counsel to the Debtor’s non-debtor affiliate, CertainTeed LLC, Goodwin Procter LLP, 1900 N Street NW, Washington, District of Columbia 20036 (Attn: Richard M. Wyner, Esq., [rwynr@goodwinlaw.com](mailto:rwynr@goodwinlaw.com)); (e) proposed counsel to the Official Committee of Asbestos Personal Injury Claimants, (I) Caplin & Drysdale, Chartered, One Thomas Circle NW, Suite 1100, Washington, District of Columbia 20005 (Kevin C. Maclay, Esq., [kmaclay@capdale.com](mailto:kmaclay@capdale.com); James P. Wehner, Esq., [jwehner@capdale.com](mailto:jwehner@capdale.com); Todd E. Phillips, Esq., [tphillips@capdale.com](mailto:tphillips@capdale.com)); (II) Robinson & Cole LLP, 1201 North Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie Ramsey, Esq., [nramsey@rc.com](mailto:nramsey@rc.com); Davis Wright, Esq., [dwright@rc.com](mailto:dwright@rc.com)); and (III) Hamilton Stephens Steele + Martin, PLLC, 525 North Tryon Street, Suite 1400, Charlotte, North Carolina 28202 (Attn: Glenn Thompson, Esq., [gthompson@lawhssm.com](mailto:gthompson@lawhssm.com)).

5. Pursuant to the Amended Interim Compensation Order, objections to this Monthly Fee Statement (each, an “Objection”), if any, must be served upon the Notice Parties, including BW, no later than 14 days after this Monthly Fee Statement’s date (the “Objection Deadline”). Any Objection must set forth the nature of the objection and the specific amount of fees or expenses at issue.

6. Upon the expiration of the Objection Deadline, the Debtor will be authorized to pay BW an amount equal to the lesser of (a) 90% of the fees and 100% of the expenses requested in this Monthly Fee Statement and (b) the aggregate amount of fees and expenses not subject to an Objection. As noted above, these amounts will be drawn from BW’s retainer consistent with paragraph 3(f) of the Amended Interim Compensation Order.

7. All fees and expenses in this Monthly Fee Statement will be included in the next interim fee application for compensation and reimbursement of expenses to be filed and served by BW at a later date.

Dated: October 6, 2021  
Washington, DC

Respectfully submitted,

/s/ Jorge Gallardo-Garcia

Jorge Gallardo-Garcia, PhD

Partner

BATES WHITE LLC

2001 K Street NW, North Building, Suite 500

Washington, DC 20006

Telephone: (202) 408-6110

Facsimile: (202) 408-7838

E-mail: jorge.gallardogarcia@bateswhite.com

ASBESTOS CONSULTANTS FOR DEBTOR  
AND DEBTOR IN POSSESSION

**EXHIBIT A**

**Bates White LLC Invoice**

In Account With  
 Bates White LLC  
 Washington, DC  
 2001 K Street NW, North Building, Suite 500  
 Washington, DC 20006  
 (202) 408-6110

October 6, 2021

DBMP LLC  
 c/o Leslie Dallas  
 20 Moores Road  
 Malvern, PA 19355

For consulting services rendered for the period August 1, 2021 through August 31, 2021:

**INTERIM AMOUNT AT STANDARD RATES AND PROMPT PAY DISCOUNT RATES**

Concept	No prompt pay discount	With prompt pay discount
Total Fees	\$118,076.00	\$118,076.00
5% Prompt Payment Discount*	\$0.00	\$5,903.80
10% Hold-Back Amount	\$11,807.60	\$11,217.22
Total Disbursements & Charges	\$0.00	\$0.00
<b>TOTAL INTERIM AMOUNT PAYABLE</b>	<b>\$106,268.40</b>	<b>\$100,954.98</b>

\* Fees subject to a 5% prompt pay discount, per the terms Bates White negotiated with the Debtor, provided Bates White receives payment for its Interim Amount within 30 days of submitting its invoice.



Bates White LLC

**SUMMARY BY CATEGORY**  
**August 1 through August 31, 2021**

Category	Billing Code	Billed Hours	Total Fees*
Analysis	L120	33.8	\$40,812.50
Client Communication	L130	13.5	\$12,662.50
Data Analysis	L130	10.2	\$5,632.50
Data Gathering & Processing	L130	120.9	\$49,188.50
Fee Request Preparation	B160	4.2	\$2,192.50
Project Management	L130	2.3	\$1,712.50
Testimony	L420	4.7	\$5,875.00
Total Fees		189.6	\$118,076.00
Total Disbursements & Charges			\$0.00
<b>TOTAL</b>			<b>\$118,076.00</b>

\* Total Fees based on standard rates without prompt pay discount.

Bates White LLC

**FEE SUMMARY BY TIMEKEEPER**  
**August 1 through August 31, 2021**

Timekeeper Name	Title	Billed Hours	Billing Rate*	Total Fees*
Bates, Charles	Partner	39.9	\$1,250.00	\$49,875.00
Gallardo-Garcia, Jorge	Partner	19.3	\$850.00	\$16,405.00
Johnson, Samantha	Manager	1	\$485.00	\$485.00
Kincheloe, Connor	Manager	25.3	\$475.00	\$12,017.50
Sun, Phyllis	Manager	1	\$585.00	\$585.00
Calder, Sara	Consultant II	2.3	\$395.00	\$908.50
Miller, Justin	Consultant II	44.2	\$375.00	\$16,575.00
Shim, Michelle	Consultant II	56.6	\$375.00	\$21,225.00
<b>TOTAL</b>		<b>189.6</b>		<b>\$118,076.00</b>

\* Billing Rates and Total Fees based on standard rates without prompt pay discount.

Bates White LLC

**DISBURSEMENT SUMMARY**  
**August 1 through August 31, 2021**

Category	Expenses
Research	\$0.00
Travel	\$0.00
Meals	\$0.00
Vendor costs	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>

**EXHIBIT B**

**Bates White LLC Time Detail**

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
8/2/2021	Bates, Charles	0.3	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 375.00
8/2/2021	Bates, Charles	0.2	\$ -	Client Communication	L130	Call with Cassada, Worf, and Gordon, and Gallardo-Garcia on next steps for case.	\$ 1,250.00	\$ 250.00
8/5/2021	Bates, Charles	0.5	\$ -	Project Management	L130	Review project status	\$ 1,250.00	\$ 625.00
8/10/2021	Bates, Charles	1.0	\$ -	Analysis	L120	Work on analysis	\$ 1,250.00	\$ 1,250.00
8/16/2021	Bates, Charles	2.5	\$ -	Analysis	L120	Deposition prep	\$ 1,250.00	\$ 3,125.00
8/16/2021	Bates, Charles	0.3	\$ -	Client Communication	L130	Confer with Gordon, Worf, and Gallardo-Garcia on next steps	\$ 1,250.00	\$ 375.00
8/17/2021	Bates, Charles	1.4	\$ -	Analysis	L120	Work on analysis in prep for depo	\$ 1,250.00	\$ 1,750.00
8/18/2021	Bates, Charles	2.5	\$ -	Analysis	L120	Work on liability analysis	\$ 1,250.00	\$ 3,125.00
8/19/2021	Bates, Charles	0.5	\$ -	Client Communication	L130	Call with counsel with Gallardo-Garcia and Kincheloe on next steps	\$ 1,250.00	\$ 625.00
8/19/2021	Bates, Charles	0.5	\$ -	Analysis	L120	Prepare for call with client	\$ 1,250.00	\$ 625.00
8/20/2021	Bates, Charles	2.5	\$ -	Analysis	L120	Review of materials for depo prep	\$ 1,250.00	\$ 3,125.00
8/20/2021	Bates, Charles	1.5	\$ -	Analysis	L120	Continued review of materials for depo prep	\$ 1,250.00	\$ 1,875.00
8/23/2021	Bates, Charles	0.4	\$ -	Client Communication	L130	Confer with counsel Cassada and Gordon regarding next steps	\$ 1,250.00	\$ 500.00
8/23/2021	Bates, Charles	1.0	\$ -	Analysis	L120	Continued work on review of material	\$ 1,250.00	\$ 1,250.00
8/23/2021	Bates, Charles	3.6	\$ -	Analysis	L120	Work on review of material	\$ 1,250.00	\$ 4,500.00
8/24/2021	Bates, Charles	3.2	\$ -	Analysis	L120	Work on materials review	\$ 1,250.00	\$ 4,000.00
8/25/2021	Bates, Charles	2.2	\$ -	Client Communication	L130	Confer with Cassada, Worf, and Gallardo-Garcia on next steps	\$ 1,250.00	\$ 2,750.00
8/25/2021	Bates, Charles	3.6	\$ -	Analysis	L120	Continue review of materials	\$ 1,250.00	\$ 4,500.00
8/26/2021	Bates, Charles	0.5	\$ -	Client Communication	L130	Confer with counsel	\$ 1,250.00	\$ 625.00
8/26/2021	Bates, Charles	2.4	\$ -	Analysis	L120	Review materials for depo prep	\$ 1,250.00	\$ 3,000.00
8/26/2021	Bates, Charles	3.6	\$ -	Analysis	L120	Continue review of materials	\$ 1,250.00	\$ 4,500.00
8/27/2021	Bates, Charles	4.7	\$ -	Testimony	L420	Sit for deposition	\$ 1,250.00	\$ 5,875.00
8/27/2021	Bates, Charles	0.5	\$ -	Analysis	L120	Prep for deposition	\$ 1,250.00	\$ 625.00
8/27/2021	Bates, Charles	0.5	\$ -	Analysis	L120	Follow up on deposition	\$ 1,250.00	\$ 625.00
8/5/2021	Calder, Sara	1.2	\$ -	Data Gathering & Processing	L130	Update processing of public data	\$ 395.00	\$ 474.00
8/16/2021	Calder, Sara	1.1	\$ -	Data Gathering & Processing	L130	Review public data processing status	\$ 395.00	\$ 434.50
8/2/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Client Communication	L130	Call with counsel Cassada, Worf, and Gordon, with Dr. Bates on next steps for case.	\$ 850.00	\$ 170.00
8/2/2021	Gallardo-Garcia, Jorge	1.1	\$ -	Data Analysis	L130	Claim resolutions' analysis.	\$ 850.00	\$ 935.00
8/3/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Analysis	L130	Work on resolutions analysis.	\$ 850.00	\$ 340.00
8/3/2021	Gallardo-Garcia, Jorge	1.0	\$ -	Client Communication	L130	Call with counsel Cassada, Ross, Geise, Gordon, Worf, with Sun and others on next steps for analysis.	\$ 850.00	\$ 850.00
8/4/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Data Analysis	L130	Work on data analysis.	\$ 850.00	\$ 510.00
8/9/2021	Gallardo-Garcia, Jorge	0.7	\$ -	Data Gathering & Processing	L130	Database processing status update.	\$ 850.00	\$ 595.00
8/10/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Data Gathering & Processing	L130	Database processing status update and plan next steps for analytical database.	\$ 850.00	\$ 510.00
8/11/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Fee Request Preparation	B160	Work on monthly compensation request.	\$ 850.00	\$ 425.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
8/12/2021	Gallardo-Garcia, Jorge	1.2	\$ -	Data Gathering & Processing	L130	Review draft analytical database and plan next steps.	\$ 850.00	\$ 1,020.00
8/13/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Data Gathering & Processing	L130	Follow up with database processing.	\$ 850.00	\$ 510.00
8/16/2021	Gallardo-Garcia, Jorge	0.3	\$ -	Client Communication	L130	Call with counsel Gordon and Worf, with Dr. Bates on next steps for case.	\$ 850.00	\$ 255.00
8/18/2021	Gallardo-Garcia, Jorge	0.9	\$ -	Data Gathering & Processing	L130	Analytical database processing status update.	\$ 850.00	\$ 765.00
8/19/2021	Gallardo-Garcia, Jorge	0.5	\$ -	Client Communication	L130	Call with counsel with Dr. Bates and Kincheloe on case status update.	\$ 850.00	\$ 425.00
8/25/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Analysis	L120	Review court documents and plan next steps for analysis.	\$ 850.00	\$ 510.00
8/25/2021	Gallardo-Garcia, Jorge	2.0	\$ -	Client Communication	L130	Call with counsel Cassada, Worf, with Dr. Bates and others on next steps for case (left early).	\$ 850.00	\$ 1,700.00
8/25/2021	Gallardo-Garcia, Jorge	1.0	\$ -	Data Gathering & Processing	L130	Review analytical database and plan next steps.	\$ 850.00	\$ 850.00
8/26/2021	Gallardo-Garcia, Jorge	1.4	\$ -	Analysis	L120	Review court documents and filings for analysis.	\$ 850.00	\$ 1,190.00
8/27/2021	Gallardo-Garcia, Jorge	3.5	\$ -	Client Communication	L130	Attend Dr. Bates deposition.	\$ 850.00	\$ 2,975.00
8/27/2021	Gallardo-Garcia, Jorge	0.8	\$ -	Analysis	L120	Review materials related to deposition.	\$ 850.00	\$ 680.00
8/27/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Client Communication	L130	Call with counsel Cassada on next steps for case.	\$ 850.00	\$ 170.00
8/27/2021	Gallardo-Garcia, Jorge	0.2	\$ -	Client Communication	L130	Call with counsel Cassada, Worf, and others on next steps for case.	\$ 850.00	\$ 170.00
8/30/2021	Gallardo-Garcia, Jorge	0.6	\$ -	Analysis	L120	Review documents filed with court.	\$ 850.00	\$ 510.00
8/31/2021	Gallardo-Garcia, Jorge	0.4	\$ -	Data Gathering & Processing	L130	Review database updates.	\$ 850.00	\$ 340.00
8/12/2021	Johnson, Samantha	0.3	\$ -	Fee Request Preparation	B160	Working on fee application	\$ 485.00	\$ 145.50
8/16/2021	Johnson, Samantha	0.7	\$ -	Fee Request Preparation	B160	Updating fee application information	\$ 485.00	\$ 339.50
8/1/2021	Kincheloe, Connor	2.8	\$ -	Data Gathering & Processing	L130	QC of claims-data processing scripts and updates	\$ 475.00	\$ 1,330.00
8/2/2021	Kincheloe, Connor	0.8	\$ -	Data Gathering & Processing	L130	QC of claimant-level data processing	\$ 475.00	\$ 380.00
8/9/2021	Kincheloe, Connor	1.5	\$ -	Project Management	L130	Planning next steps for case data processing and analysis	\$ 475.00	\$ 712.50
8/11/2021	Kincheloe, Connor	0.8	\$ -	Fee Request Preparation	B160	Reviewing monthly time entries	\$ 475.00	\$ 380.00
8/12/2021	Kincheloe, Connor	0.5	\$ -	Fee Request Preparation	B160	Continued review of monthly time entries	\$ 475.00	\$ 237.50
8/12/2021	Kincheloe, Connor	1.1	\$ -	Data Gathering & Processing	L130	Reviewing and analyzing claims data	\$ 475.00	\$ 522.50
8/18/2021	Kincheloe, Connor	1.5	\$ -	Data Analysis	L130	Analyzing preliminary DBMP analytical claims database	\$ 475.00	\$ 712.50
8/18/2021	Kincheloe, Connor	2.2	\$ -	Data Gathering & Processing	L130	QC of DBMP claims database	\$ 475.00	\$ 1,045.00
8/19/2021	Kincheloe, Connor	0.5	\$ -	Client Communication	L130	Call with counsel, and Dr. Bates, and Gallardo-Garcia to discuss status of work streams	\$ 475.00	\$ 237.50
8/19/2021	Kincheloe, Connor	0.1	\$ -	Analysis	L120	Prepare for client call	\$ 475.00	\$ 47.50
8/19/2021	Kincheloe, Connor	2.0	\$ -	Data Gathering & Processing	L130	Reviewing updates to claims database	\$ 475.00	\$ 950.00
8/19/2021	Kincheloe, Connor	1.5	\$ -	Data Analysis	L130	Analyzing DBMP claims database	\$ 475.00	\$ 712.50
8/19/2021	Kincheloe, Connor	2.4	\$ -	Data Analysis	L130	Continued analysis of DBMP claims database	\$ 475.00	\$ 1,140.00
8/20/2021	Kincheloe, Connor	2.1	\$ -	Data Gathering & Processing	L130	Reviewing DBMP claims database	\$ 475.00	\$ 997.50
8/20/2021	Kincheloe, Connor	1.2	\$ -	Data Analysis	L130	Analyzing DBMP claims data	\$ 475.00	\$ 570.00
8/30/2021	Kincheloe, Connor	1.4	\$ -	Data Gathering & Processing	L130	Reviewing updates to data processing and preliminary analytical database	\$ 475.00	\$ 665.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
8/30/2021	Kincheloe, Connor	0.8	\$ -	Fee Request Preparation	B160	Reviewing monthly compensation request	\$ 475.00	\$ 380.00
8/31/2021	Kincheloe, Connor	0.6	\$ -	Fee Request Preparation	B160	Updating monthly compensation request	\$ 475.00	\$ 285.00
8/31/2021	Kincheloe, Connor	1.5	\$ -	Data Analysis	L130	Analyzing DBMP claims data	\$ 475.00	\$ 712.50
8/17/2021	Miller, Justin	1.9	\$ -	Data Gathering & Processing	L130	Review of updates to claims data processing code	\$ 375.00	\$ 712.50
8/20/2021	Miller, Justin	1.2	\$ -	Data Gathering & Processing	L130	Reviewed documentation of code and case materials	\$ 375.00	\$ 450.00
8/20/2021	Miller, Justin	1.3	\$ -	Data Gathering & Processing	L130	Reviewed scripts for claims data processing	\$ 375.00	\$ 487.50
8/23/2021	Miller, Justin	2.9	\$ -	Data Gathering & Processing	L130	Script review for claims data processing code	\$ 375.00	\$ 1,087.50
8/23/2021	Miller, Justin	2.5	\$ -	Data Gathering & Processing	L130	Continued script review for claims data processing code	\$ 375.00	\$ 937.50
8/23/2021	Miller, Justin	2.3	\$ -	Data Gathering & Processing	L130	Updated scripts for claims data processing code	\$ 375.00	\$ 862.50
8/24/2021	Miller, Justin	2.2	\$ -	Data Gathering & Processing	L130	QC of claims data processing scripts	\$ 375.00	\$ 825.00
8/24/2021	Miller, Justin	2.7	\$ -	Data Gathering & Processing	L130	Updates to claims data processing scripts	\$ 375.00	\$ 1,012.50
8/24/2021	Miller, Justin	1.9	\$ -	Data Gathering & Processing	L130	Continued updates to claims data processing scripts	\$ 375.00	\$ 712.50
8/25/2021	Miller, Justin	2.9	\$ -	Data Gathering & Processing	L130	Review of claims data processing scripts	\$ 375.00	\$ 1,087.50
8/25/2021	Miller, Justin	2.4	\$ -	Data Gathering & Processing	L130	Continued review of claims data processing scripts	\$ 375.00	\$ 900.00
8/25/2021	Miller, Justin	2.3	\$ -	Data Gathering & Processing	L130	Further review of claims data processing scripts	\$ 375.00	\$ 862.50
8/26/2021	Miller, Justin	1.4	\$ -	Data Gathering & Processing	L130	Continued script updates in claims data processing code	\$ 375.00	\$ 525.00
8/26/2021	Miller, Justin	2.4	\$ -	Data Gathering & Processing	L130	Script updates in claims data processing code	\$ 375.00	\$ 900.00
8/27/2021	Miller, Justin	2.8	\$ -	Data Gathering & Processing	L130	Claims data processing script review	\$ 375.00	\$ 1,050.00
8/27/2021	Miller, Justin	2.1	\$ -	Data Gathering & Processing	L130	Further claims data processing script review	\$ 375.00	\$ 787.50
8/27/2021	Miller, Justin	2.4	\$ -	Data Gathering & Processing	L130	Continued claims data processing script review	\$ 375.00	\$ 900.00
8/30/2021	Miller, Justin	2.4	\$ -	Data Gathering & Processing	L130	Script review for claims data processing	\$ 375.00	\$ 900.00
8/30/2021	Miller, Justin	2.9	\$ -	Data Gathering & Processing	L130	Continued script review for claims data processing	\$ 375.00	\$ 1,087.50
8/31/2021	Miller, Justin	1.3	\$ -	Data Gathering & Processing	L130	Review of claims data code and scripts	\$ 375.00	\$ 487.50
8/2/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Updating additional claim and claimant-level data supplementation for grouped claims	\$ 375.00	\$ 937.50
8/2/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued updating additional claim and claimant-level data supplementation for grouped claims	\$ 375.00	\$ 825.00
8/2/2021	Shim, Michelle	1.4	\$ -	Data Gathering & Processing	L130	QCing claims data source information for analytical database	\$ 375.00	\$ 525.00
8/4/2021	Shim, Michelle	1.3	\$ -	Data Gathering & Processing	L130	Reviewing and updating processing code for implicated entities	\$ 375.00	\$ 487.50
8/11/2021	Shim, Michelle	0.7	\$ -	Data Gathering & Processing	L130	Continued reviewing and updating processing code for implicated entities	\$ 375.00	\$ 262.50
8/12/2021	Shim, Michelle	2.4	\$ -	Data Gathering & Processing	L130	Reviewing and updating claim-level groupings for analytical database	\$ 375.00	\$ 900.00
8/17/2021	Shim, Michelle	1.4	\$ -	Data Gathering & Processing	L130	Reviewing tasks for updating analytical database claim groupings	\$ 375.00	\$ 525.00
8/19/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Updating claim-level data merge and supplementation code	\$ 375.00	\$ 975.00

Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
8/20/2021	Shim, Michelle	2.8	\$ -	Data Gathering & Processing	L130	Continued updating claim-level data merge and supplementation code	\$ 375.00	\$ 1,050.00
8/20/2021	Shim, Michelle	1.5	\$ -	Data Gathering & Processing	L130	Reviewing claim-level data processing from grouping code	\$ 375.00	\$ 562.50
8/23/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	Continued QCing and reviewing claim-level data processing from grouping code	\$ 375.00	\$ 675.00
8/24/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	Continued updating claim-level prioritization code for grouped claims database	\$ 375.00	\$ 637.50
8/24/2021	Shim, Michelle	1.3	\$ -	Data Gathering & Processing	L130	Reviewing updates for claim and claimant-level grouping code	\$ 375.00	\$ 487.50
8/24/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Updating claim-level prioritization code for grouped claims database	\$ 375.00	\$ 825.00
8/25/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Continued reviewing updates for claim and claimant-level grouping code	\$ 375.00	\$ 937.50
8/25/2021	Shim, Michelle	2.3	\$ -	Data Gathering & Processing	L130	Updating public settlement amount calculations for grouped claims	\$ 375.00	\$ 862.50
8/25/2021	Shim, Michelle	1.9	\$ -	Data Gathering & Processing	L130	QCing and updating claim-level data processing and merging code	\$ 375.00	\$ 712.50
8/26/2021	Shim, Michelle	1.8	\$ -	Data Gathering & Processing	L130	QCing claim-level data consolidation and supplementation code	\$ 375.00	\$ 675.00
8/26/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued QCing and updating claim-level data consolidation and supplementation code	\$ 375.00	\$ 825.00
8/26/2021	Shim, Michelle	1.6	\$ -	Data Gathering & Processing	L130	Continued QCing and updating claim-level data processing and merging code	\$ 375.00	\$ 600.00
8/27/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Updating claim-level merge with publicly available data	\$ 375.00	\$ 937.50
8/27/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued updating claim-level merge with publicly available data	\$ 375.00	\$ 825.00
8/27/2021	Shim, Michelle	1.7	\$ -	Data Gathering & Processing	L130	QCing claim-level data processing and merge code	\$ 375.00	\$ 637.50
8/30/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Reviewing and updating claimant-level data processing for grouped claims	\$ 375.00	\$ 975.00
8/30/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued QCing claim-level data processing and merge code	\$ 375.00	\$ 825.00
8/31/2021	Shim, Michelle	2.6	\$ -	Data Gathering & Processing	L130	Reviewing claim-level data processing and grouping code results	\$ 375.00	\$ 975.00
8/31/2021	Shim, Michelle	2.2	\$ -	Data Gathering & Processing	L130	Continued reviewing and updating claimant-level data processing for grouped claims	\$ 375.00	\$ 825.00
8/31/2021	Shim, Michelle	2.5	\$ -	Data Gathering & Processing	L130	Continued reviewing and updating claim-level data grouping code results	\$ 375.00	\$ 937.50



Date incurred	Employee	Hours	Expense	Category	Billing code	Notes	Bill rate	Professional fees
8/3/2021	Sun, Phyllis	1.0	\$ -	Client Communication	L130	Call with counsel V. Ross, counsel Geise, counsel J. Ellman, counsel R. Worf, counsel G. Cassada, counsel G. Gordon, with J. Gallardo-Garcia, and others on next steps in analysis	\$ 585.00	\$ 585.00

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re

DBMP LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**ORDER GRANTING THE FIFTH INTERIM APPLICATION OF  
BATES WHITE FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES AS ASBESTOS CONSULTANTS TO THE DEBTOR  
FOR THE PERIOD FROM MAY 1, 2021 THROUGH AUGUST 31, 2021**

This matter coming before the Court on the *Fifth Interim Application of Bates White LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Asbestos Consultants to the Debtor for the Period From May 1, 2021 Through August 31, 2021* (the “Interim Fee Application”)<sup>2</sup> filed by Bates White, LLC (“Bates White”) as asbestos consultants to the above-captioned debtor and debtor in possession (the “Debtor”); the Court having reviewed the Interim Fee Application; the

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Interim Fee Application.

Court having found that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (c) notice of the Interim Fee Application and the notice of an opportunity for hearing were served upon the parties required by Local Rule 2002-1(g) and the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 402] (the “Amended Interim Compensation Order”) and no other or further notice is required, (d) the compensation requested in the Interim Fee Application is reasonable and for actual and necessary services rendered by Bates White on behalf of the Debtor during the period from May 1, 2021 through August 31, 2021 (the “Compensation Period”), (e) the expenses for which reimbursement is sought in the Interim Fee Application are actual and necessary expenses incurred by Bates White during the Compensation Period on behalf of the Debtor and (f) the Interim Fee Application fully complies with the Amended Interim Compensation Order, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the Compensation Guidelines; and the Court having determined that the legal and factual bases set forth in the Interim Fee Application establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Interim Fee Application is GRANTED.
2. Bates White is awarded, on an interim basis, compensation for professional services rendered during the Compensation Period in the amount of \$579,871.93, and reimbursement for actual and necessary expenses incurred by Bates White during the Compensation Period in the amount of \$0.00.

3. The Debtor is authorized and directed to pay promptly to Bates White the amount of fees and expenses approved by this Order, to the extent that such amounts have not previously been paid by the Debtor.

4. The Debtor and Bates White are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

5. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, enforcement or interpretation of this Order.

This Order has been signed electronically.  
The Judge's signature and Court's seal appear  
at the top of the Order.

United States Bankruptcy Court