

**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)

**SECOND INTERIM APPLICATION OF ALEXANDER RICKS PLLC  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR PROFESSIONAL SERVICES RENDERED AS  
COUNSEL TO SANDER L. ESSERMAN, LEGAL REPRESENTATIVE FOR FUTURE  
ASBESTOS CLAIMANTS, FOR THE PERIOD OF  
MAY 1, 2021 THROUGH AUGUST 31, 2021**

Name of Applicant:	Alexander Ricks PLLC
Authorized to Provide Professional Services to:	Sander L. Esserman, legal representative for future asbestos claimants
Date of Retention:	February 1, 2021 (by Order dated February 5, 2021)
Period for which compensation and reimbursement is sought:	May 1, 2021 through August 31, 2021
Amount of Compensation sought:	\$75,350.00
Amount of Expense Reimbursement sought:	\$0.00
Total amount of compensation and expense reimbursement:	\$75,350.00
This is an:	<input type="checkbox"/> monthly <input checked="" type="checkbox"/> interim <input type="checkbox"/> final application

This is the Second Interim Application for Allowance of Compensation and Expenses filed by Alexander Ricks PLLC

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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.

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re:

DBMP LLC,

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**SECOND INTERIM APPLICATION OF ALEXANDER RICKS PLLC  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR PROFESSIONAL SERVICES RENDERED AS  
COUNSEL TO SANDER L. ESSERMAN, LEGAL REPRESENTATIVE FOR FUTURE  
ASBESTOS CLAIMANTS, FOR THE PERIOD OF  
MAY 1, 2021 THROUGH AUGUST 31, 2021**

Alexander Ricks PLLC (“Alexander Ricks” or “Applicant”), as North Carolina counsel to Sander L. Esserman, the legal representative for future claimants (the “Future Claimants’ Representative” or the “FCR”) in the chapter 11 case commenced by DBMP, LLC (“DBMP” or the “Debtor”), files this Second Interim Application (the “Application”) for Allowance of Compensation and Reimbursement of Expenses for Professional Services Rendered as Counsel to Sander L. Esserman, Legal Representative for Future Claimants for the period from May 1, 2021 through August 31, 2021 (the “Interim Period”) pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”) and this Court’s *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* dated August 6, 2020 [Docket No. 402] (the “Interim Compensation Order”).

By this Application, Alexander Ricks respectfully requests that the Court enter an order

awarding Applicant reasonable compensation for the Interim Period in the amount of \$75,350.00 and reimbursement of actual and necessary expenses in the amount of \$0.00 for a total amount of \$75,350.00. In support of this Application, Alexander Ricks states as follows:

### **BACKGROUND**

1. On January 23, 2020 (the “Petition Date”), the Debtor filed a voluntary petition in this Court for relief under chapter 11 of the Bankruptcy Code.
2. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
3. On February 5, 2021, the Court entered the *Ex Parte Order Authorizing Retention and Employment of Alexander Ricks PLLC as North Carolina Counsel for the Future Claimants’ Representative* [Docket No. 653] (the “Retention Order”).
4. Pursuant to the Interim Compensation Order, professionals may request monthly compensation and reimbursement. Such requests are to be served on the Notice Parties (as further defined in the Interim Compensation Order, the “Notice Parties”) for review. The Interim Compensation Procedures require a fourteen (14) day objection period. Accordingly, if no objection to a professional’s request is received within fourteen (14) days of such request, the Debtor is authorized to pay 90% of the fees and 100% of the expenses requested. The Interim Compensation Order also requires each retained professional to file, approximately every four (4) months, an application for interim Court approval and allowance pursuant to sections 330 and 331 of the Bankruptcy Code of 100% of the compensation and reimbursement expenses for the prior four (4) months.

### **COMPENSATION RECEIVED DURING INTERIM PERIOD**

5. All services for which the Applicant seeks compensation were performed

in connection with Applicant's role as counsel to the FCR. During the Interim Period, Applicant submitted the following monthly fee statements:

<b>Date of Request</b>	<b>Period Covered</b>	<b>Requested Fees/Expenses</b>	<b>Amount Paid or to be Paid (90% of Fees; 100% of Expenses)</b>	<b>Amount of Holdback Requested</b>
7/2/2021	5/1/2021-5/31/2021	\$12,445.00	\$11,200.50	\$1,244.50
7/29/2021	6/1/2021-6/30/2021	\$22,187.50	\$19,968.75	\$2,218.75
8/25/2021	7/1/2021-7/31/2021	\$9,370.00	\$8,433.00	\$937.00
9/30/2021	8/1/2021-8/31/2021	\$31,347.50	\$28,212.75	\$3,134.75
<b>Total</b>		<b>\$75,350.00</b>	<b>\$67,815.00</b>	<b>\$7,535.00</b>

The monthly fee statements were served upon the Notice Parties for review as directed by the Interim Compensation Order. As of the date of this Application, no interested party has objected to Alexander Ricks' monthly fee requests as of the date of this Application.

#### **SERVICES RENDERED**

6. Attached hereto as **Exhibits A-1 through A-4** are detailed descriptions of the services performed and expenses incurred by Applicant during the Interim Period. In summary, the Applicant expended a total of 184.40 hours rendering services on behalf of the FCR. During the Interim Period, Alexander Ricks (i) assisted with issues related to the Debtor's motion to estimate its asbestos liabilities, (ii) assisted with issues related to the Court's preliminary injunction ruling, (iii) assisted with objections to the Debtor's motions to conduct discovery pursuant to Fed. R. Bankr. P. 2004 and related discovery issues, (iv) attended hearings on various

matters, and (v) assisted with preparation of fee applications for FCR professionals.

7. On **Exhibit B**, Alexander Ricks has categorized its time for the Interim Period by the project categories recommended by the Guidelines for Compensation and Expense Reimbursement of Professionals (the “Compensation Guidelines”) adopted by the United States Bankruptcy Court for the Western District of North Carolina.

8. **Exhibit B** also contains a listing of each professional of Alexander Ricks who provided services during the interim period and the total hours worked by each such professional.

9. Alexander Ricks believes that its billing rates for the Interim Period are consistent with billing rates charged by other professionals in this District for the services provided.

### **NOTICE**

10. Notice of this Application has been provided in accordance with the Interim Compensation Order.

WHEREFORE, Alexander Ricks respectfully requests that the Court enter an Order:

1. Allowing interim compensation to Alexander Ricks in the amount of \$75,350.00 as reasonable, actual and necessary for professional services rendered by Alexander Ricks during the Interim Period and \$0.00 as actual and necessary expenses for a total amount of \$75,350.00 without prejudice to the right of Alexander Ricks to seek additional compensation for services rendered and expenses incurred during the Interim Period that were not processed at the time of this Application;

2. Authorizing and directing the Debtor to pay Alexander Ricks the amount of 100% of the interim fees and expenses that are approved less any previous payment made to Alexander Ricks pursuant to the Interim Compensation Order; and,
3. Granting such other relief as the Court deems just and proper.

Dated: October 27, 2021

Respectfully submitted,

/s/ Felton E. Parrish

Felton E. Parrish (N.C. Bar No. 25448)  
ALEXANDER RICKS PLLC  
1420 East 7<sup>th</sup> Street, Suite 100  
Charlotte, NC 28204  
Telephone: 704-365-3656  
Facsimile: 704-365-3676  
Email: felton.parrish@alexanderricks.com

-and-

James L. Patton, Jr. (DE Bar No. 2202)  
Edwin J. Harron (DE Bar No. 3396)  
Sharon M. Zieg (N.C. Bar No. 29536, DE Bar No. 4196)  
Travis G. Buchanan (DE Bar No. 5595)  
YOUNG CONAWAY STARGATT & TAYLOR, LLP  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 571-6600  
Facsimile: (302) 571-1253  
Email: jpatton@ycst.com  
eharron@ycst.com  
szieg@ycst.com  
tbuchanan@ycst.com

*Counsel to the Future Claimants' Representative*

# **Exhibit A-1**

Alexander  
Ricks  
PLLC

July 2, 2021

Alexander Ricks PLLC  
1420 East Seventh Street, Suite 100  
Charlotte, North Carolina 28204

**VIA ELECTRONIC MAIL**

**TO: Notice Parties**

Main Tel 704.365.3656  
Main Fax 704.365.3676  
www.alexanderricks.com

**Felton E. Parrish**  
980.334.2001  
Felton.Parrish@alexanderricks.com

**RE: Monthly Compensation Statement – *In re DBMP, LLC*, Case No. 20-30080 (JCW) (Jointly Administered), U.S. Bankruptcy Court for the Western District of North Carolina (Charlotte Division)**

Alexander Ricks PLLC (“Alexander Ricks”) was retained as counsel to Sander L. Esserman, the legal representative for future claimants (the “Future Claimants’ Representative”) effective as of February 1, 2021 pursuant to the *Ex Parte Order Authorizing Substitution of Alexander Ricks PLLC As North Carolina Counsel For the Future Claimants’ Representative* dated February 5, 2021 [Docket No. 653]. Alexander Ricks hereby submits this Monthly Statement for Compensation and Reimbursement for the period from May 1, 2021 through May 31, 2021 (the “Fee Period”).

During the Fee Period, Alexander Ricks incurred fees of \$12,445.00 and expenses in the amount of \$0.00. Pursuant to the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* dated August 6, 2020 [Docket No. 402], retained professionals may request 90% of their fees and 100% of their expenses on a monthly basis. Accordingly, Alexander Ricks PLLC requests payment from the Debtor in the total amount of **\$11,200.50** which is calculated as follows: \$11,200.50 (90% of \$12,445.00) plus \$0.00 (100% of expenses).

Attached hereto and incorporated as part of this Monthly Compensation Statement is Alexander Ricks PLLC’s invoice for the Fee Period.

Sincerely,

/s/ Felton E. Parrish

Felton E. Parrish



Alexander Ricks PLLC

Document Page 9 of 48

**Invoice**

1420 E. 7th Street, Ste 100  
Charlotte, NC 28204  
704-365-3656

Sander Esserman  
Stutzman, Bromberg, Esserman & Plifka  
2323 Bryan Street, Suite 2200  
Dallas, TX 75201

Invoice # 44033

June 7, 2021

In Reference To: DBMP, LLC Chapter 11

Page 1

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**Current Billing Summary**

Current fees	\$12,445.00
Current expenses	<u>\$0.00</u>
Total Fees and Expenses this Invoice	\$12,445.00

# Invoice

Sander Esserman

Page 2

In Reference To: DBMP, LLC Chapter 11

## Professional Services Itemization

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
<u>Case Administration</u>				
5/3/2021	FEP Case Administration	Review updated critical dates calendar	0.10	\$47.50
5/3/2021	FEP Case Administration	Email to M. Moore and E. Harron re: objection deadlines	0.20	\$95.00
5/3/2021	FEP Case Administration	Emails with U. Hamilton re: hearing information	0.20	\$95.00
5/4/2021	FEP Case Administration	Email to S. Zieg re: hearing issue	0.10	\$47.50
5/4/2021	FEP Case Administration	Prepare for conference call with FCR team	0.30	\$142.50
5/4/2021	FEP Case Administration	Prepare for hearing on ACC 2004 motion	0.30	\$142.50
5/4/2021	FEP Case Administration	participate in FCR team call	0.70	\$332.50
5/4/2021	FEP Case Administration	Attend hearing on ACC 2004 Motion	1.90	\$902.50
5/5/2021	FEP Case Administration	conference with J. Spencer re: status	0.40	\$190.00
5/6/2021	FEP Case Administration	Review emails re: scheduling for PIQ/Trust discovery motions	0.20	\$95.00
5/10/2021	FEP Case Administration	Review updated critical dates calendar	0.10	\$47.50
5/11/2021	FEP Case Administration	Review emails re: hearing schedule	0.10	\$47.50
5/12/2021	FEP Case Administration	Email to Chambers re: hearing information	0.10	\$47.50

# Invoice

Sander Esserman

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In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
5/12/2021	FEP Case Administration	Review emails re: scheduling issues	0.20	\$95.00
5/13/2021	FEP Case Administration	Email to J. Spencer re: status	0.10	\$47.50
5/17/2021	FEP Case Administration	review emails re: PIQ scheduling issues	0.20	\$95.00
5/18/2021	FEP Case Administration	Attend FCR team meeting	0.50	\$237.50
5/21/2021	FEP Case Administration	Review updated critical dates calendar	0.20	\$95.00
5/25/2021	FEP Case Administration	participate in FCR team call re: status of PIQ/Trust discovery motions	0.20	\$95.00
5/25/2021	FEP Case Administration	review docket entries	0.20	\$95.00
5/27/2021	FEP Case Administration	Review docket update and critical dates calendar from M. Moore	0.20	\$95.00
5/28/2021	FEP Case Administration	Review emails from debtor counsel and chambers re: scheduling issues	0.10	\$47.50
SUBTOTAL:			6.60	\$3,135.00
<u>Fee Proceedings</u>				
5/12/2021	JMS Fee Proceedings	Draft Fee Statement.	0.30	\$75.00
5/13/2021	FEP Fee Proceedings	Email to K. Sentelle re: monthly fee statement	0.10	\$47.50
5/17/2021	FEP Fee Proceedings	Email to H. Panko re: monthly fee statement	0.10	\$47.50
5/19/2021	FEP Fee Proceedings	Review and finalize supplemental Esserman and SBEP declarations	0.80	\$380.00

**Invoice**

Sander Esserman

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In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
5/23/2021	FEP Fee Proceedings	Email to H. Panko re: fee applications	0.20	\$95.00
5/25/2021	FEP Fee Proceedings	finalize and circulate fee statements for FCR professionals	0.30	\$142.50
SUBTOTAL:			1.80	\$787.50
<u>Litigation</u>				
5/3/2021	FEP Litigation	Review responses to ACC 2004 motion and related issues	1.80	\$855.00
5/4/2021	JMS Litigation	Attend Hearing on ACC's Rule 2004 Motion.	1.90	\$475.00
5/5/2021	JMS Litigation	Research potential bankruptcy issues.	0.30	\$75.00
5/5/2021	JMS Litigation	Conference with F. Parrish re: status	0.40	\$100.00
5/7/2021	FEP Litigation	Email to E. Bradley re: PIQ issues	1.20	\$570.00
5/7/2021	FEP Litigation	Review PIQ issues	2.30	\$1,092.50
5/10/2021	JMS Litigation	Research potential Bankruptcy issues.	0.80	\$200.00
5/11/2021	FEP Litigation	Email to J. Spencer re: potential issue for research	0.30	\$142.50
5/12/2021	JMS Litigation	Research potential bankruptcy issues.	0.30	\$75.00
5/12/2021	JMS Litigation	Research Potential bankruptcy issues.	0.60	\$150.00
5/13/2021	FEP Litigation	Review PIQ issues	1.60	\$760.00

**Invoice**

Sander Esserman

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In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
5/14/2021	FEP Litigation	Email to E. Bradley re: potential PIQ issue	1.20	\$570.00
5/17/2021	JMS Litigation	Research potential bankruptcy issues.	0.50	\$125.00
5/18/2021	JMS Litigation	Research potential bankruptcy issues.	0.60	\$150.00
5/20/2021	FEP Litigation	Initial review of draft objection to trust motion	0.80	\$380.00
5/22/2021	FEP Litigation	Review draft PIQ/Trust discovery objections and related issues	3.20	\$1,520.00
5/23/2021	FEP Litigation	Review email from T. Phillips re: deposition designations	0.10	\$47.50
5/23/2021	FEP Litigation	Email to E. Harron, S. Zieg, and E. Bradley re: PIQ/Trust objections	0.20	\$95.00
5/23/2021	FEP Litigation	Revisions to draft PIQ/Trust objections	1.70	\$807.50
5/26/2021	FEP Litigation	Call with G. Thompson and H. Culp re: status of PIQ/Trust discovery motions	0.10	\$47.50
5/27/2021	FEP Litigation	Initial review of revised drafts of PIQ/Trust Discovery objections	0.60	\$285.00
Subtotal:			20.50	\$8,522.50

For professional services rendered

28.90 \$12,445.00

**Invoice**

Sander Esserman

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In Reference To: DBMP, LLC Chapter 11

Name	Timekeeper Summary	Hours	Rate	Amount
Felton Parrish		23.20	475.00	\$11,020.00
Jack Spencer		5.70	250.00	\$1,425.00

## **Exhibit A-2**

Alexander  
Ricks  
PLLC

July 29, 2021

**VIA ELECTRONIC MAIL**

**TO: Notice Parties**

Alexander Ricks PLLC  
1420 East Seventh Street, Suite 100  
Charlotte, North Carolina 28204

Main Tel 704.365.3656  
Main Fax 704.365.3676  
www.alexanderricks.com

**Felton E. Parrish**  
980.334.2001  
Felton.Parrish@alexanderricks.com

**RE: Monthly Compensation Statement – *In re DBMP, LLC*, Case No. 20-30080 (JCW) (Jointly Administered), U.S. Bankruptcy Court for the Western District of North Carolina (Charlotte Division)**

Alexander Ricks PLLC (“Alexander Ricks”) was retained as counsel to Sander L. Esserman, the legal representative for future claimants (the “Future Claimants’ Representative”) effective as of February 1, 2021 pursuant to the *Ex Parte Order Authorizing Substitution of Alexander Ricks PLLC As North Carolina Counsel For the Future Claimants’ Representative* dated February 5, 2021 [Docket No. 653]. Alexander Ricks hereby submits this Monthly Statement for Compensation and Reimbursement for the period from June 1, 2021 through June 30, 2021 (the “Fee Period”).

During the Fee Period, Alexander Ricks incurred fees of \$22,187.50 and expenses in the amount of \$0.00. Pursuant to the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* dated August 6, 2020 [Docket No. 402], retained professionals may request 90% of their fees and 100% of their expenses on a monthly basis. Accordingly, Alexander Ricks PLLC requests payment from the Debtor in the total amount of **\$19,968.75** which is calculated as follows: \$19,968.75 (90% of \$22,187.50) plus \$0.00 (100% of expenses).

Attached hereto and incorporated as part of this Monthly Compensation Statement is Alexander Ricks PLLC’s invoice for the Fee Period.

Sincerely,

/s/ Felton E. Parrish

Felton E. Parrish



Alexander Ricks PLLC

Document Page 17 of 48

**Invoice**

1420 E. 7th Street, Ste 100  
Charlotte, NC 28204  
704-365-3656

Sander Esserman  
Stutzman, Bromberg, Esserman & Plifka  
2323 Bryan Street, Suite 2200  
Dallas, TX 75201

Invoice # 44273

July 2, 2021

In Reference To: DBMP, LLC Chapter 11

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**Current Billing Summary**

Current fees	<b>\$22,187.50</b>
Current expenses	<b>\$0.00</b>
Total Fees and Expenses this Invoice	<b>\$22,187.50</b>

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# Invoice

Sander Esserman

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In Reference To: DBMP, LLC Chapter 11

## Professional Services Itemization

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
<u>Case Administration</u>				
6/7/2021	FEP Case Administration	Review recent filings and correspondence	0.30	\$142.50
6/7/2021	FEP Case Administration	Conference call with FCR team re: status and open issues	1.40	\$665.00
6/9/2021	JMS Case Administration	Conference with F. Parrish re: status of open items.	0.20	\$50.00
6/9/2021	FEP Case Administration	conference with J. Spencer re: status of open items	0.20	\$95.00
6/10/2021	FEP Case Administration	Review docket update from C. Cathcart	0.10	\$47.50
6/10/2021	FEP Case Administration	Review updated critical dates calendar	0.20	\$95.00
6/14/2021	FEP Case Administration	Review updated critical dates calendar	0.10	\$47.50
6/14/2021	FEP Case Administration	Review emails re: motion to reopen	0.20	\$95.00
6/15/2021	FEP Case Administration	review order shortening notice on motion to reopen	0.10	\$47.50
6/15/2021	FEP Case Administration	Participate in FCR team status call	0.80	\$380.00
6/16/2021	FEP Case Administration	Review hearing agenda	0.10	\$47.50
6/16/2021	FEP Case Administration	Review correspondence to chambers re: Gross deposition	0.10	\$47.50

# Invoice

Sander Esserman

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In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/16/2021	FEP Case Administration	Review email from J. Ellman re: Gross transcript	0.10	\$47.50
6/18/2021	FEP Case Administration	Review email from J. Ellman re: expert protocol	0.20	\$95.00
6/22/2021	FEP Case Administration	Review status	0.30	\$142.50
6/23/2021	FEP Case Administration	Review updated critical dates calendar	0.10	\$47.50
6/23/2021	FEP Case Administration	Review debtor motion to extend removal deadline	0.20	\$95.00
6/24/2021	FEP Case Administration	Email summary of Aldrich hearing to E. Harron, S. Zieg and S. Esserman	0.40	\$190.00
6/24/2021	FEP Case Administration	monitor hearing in Aldrich Pump case	0.60	\$285.00
6/28/2021	FEP Case Administration	Docket Review	0.20	\$95.00
6/29/2021	FEP Case Administration	Review updated critical dates calendar	0.10	\$47.50
6/29/2021	FEP Case Administration	participate in FCR team status call	0.60	\$285.00
6/29/2021	FEP Case Administration	prepare for FCR team status call	0.80	\$380.00
SUBTOTAL:			7.40	\$3,470.00
<u>Fee Proceedings</u>				
6/5/2021	FEP Fee Proceedings	Prepare Hull & Chandler Fee Application	0.70	\$332.50

# Invoice

Sander Esserman

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In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/6/2021	FEP Fee Proceedings	Prepare Alexander Ricks Fee Application	1.40	\$665.00
6/7/2021	FEP Fee Proceedings	Email to I. Perez re: fee applications	0.10	\$47.50
6/8/2021	FEP Fee Proceedings	Email to H. Panko re: timing of filing for interim fee apps	0.10	\$47.50
6/8/2021	FEP Fee Proceedings	Email to L. Eden re: status of fee applications	0.10	\$47.50
6/8/2021	FEP Fee Proceedings	Review and circulate Ankura fee statement	0.20	\$95.00
6/14/2021	FEP Fee Proceedings	Review SBEP interim fee application	0.30	\$142.50
6/16/2021	FEP Fee Proceedings	Email I. Perez re: fee application status	0.10	\$47.50
6/16/2021	FEP Fee Proceedings	Review and revise draft fee statement	0.30	\$142.50
6/21/2021	FEP Fee Proceedings	Review fee applications for FCR professionals	0.70	\$332.50
6/24/2021	FEP Fee Proceedings	finalize and file fee applications for FCR professionals	0.70	\$332.50
6/30/2021	JMS Fee Proceedings	Draft Order granting fee application for Alexander Ricks.	0.30	\$75.00
SUBTOTAL:			5.00	\$2,307.50
<u>Litigation</u>				
6/4/2021	FEP Litigation	Emails with T. Buchanan re: PIQ Objection	0.20	\$95.00

# Invoice

Sander Esserman

Page 5

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/5/2021	FEP Litigation	Initial review of revised PIQ objection	0.60	\$285.00
6/5/2021	FEP Litigation	Review discovery requests from Debtor	0.30	\$142.50
6/6/2021	FEP Litigation	Review draft PIQ objection and related issues	2.30	\$1,092.50
6/8/2021	FEP Litigation	Review revised drafts of objections to 2004 motions and related documents	3.30	\$1,567.50
6/9/2021	JMS Litigation	Conference with F. Parrish re: PIQ/Trust discovery issues.	0.20	\$50.00
6/9/2021	FEP Litigation	conference with J. Spencer re: PIQ/Trust discovery issues	0.20	\$95.00
6/9/2021	JMS Litigation	Research potential bankruptcy issues.	0.60	\$150.00
6/9/2021	FEP Litigation	Revisions to draft objections to 2004 motions	1.70	\$807.50
6/10/2021	FEP Litigation	Review emails re: objections to 2004 motions	0.30	\$142.50
6/10/2021	FEP Litigation	Review revised drafts of objections to 2004 motions	0.80	\$380.00
6/10/2021	FEP Litigation	Draft motion to seal	1.50	\$712.50
6/10/2021	FEP Litigation	Emails with E. Bradley and S. Zieg re: motion to strike	0.40	\$190.00
6/11/2021	JMS Litigation	Address issues related to Debtor's motion for a preliminary injunction.	0.50	\$125.00
6/11/2021	FEP Litigation	Email to M. Fryling re: motion to seal and unredacted documents	0.30	\$142.50

# Invoice

Sander Esserman

Page 6

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/11/2021	FEP Litigation	Revise motion to seal	0.60	\$285.00
6/11/2021	FEP Litigation	Call with E. Harron, S. Zieg and S. Esserman re: draft motion to reopen record	0.80	\$380.00
6/11/2021	FEP Litigation	review and compile exhibits for confidentiality issues	1.60	\$760.00
6/11/2021	FEP Litigation	Review revised drafts of objections to 2004 motions	2.30	\$1,092.50
6/11/2021	FEP Litigation	Review and finalize objections and motion to seal for filing	2.80	\$1,330.00
6/11/2021	FEP Litigation	Review emails re: draft objections to 2004 motions	0.30	\$142.50
6/11/2021	FEP Litigation	Review draft discovery requests	0.40	\$190.00
6/14/2021	FEP Litigation	Review emails re: discovery requests	0.20	\$95.00
6/16/2021	FEP Litigation	Review filings and related materials re: motion to reopen PI record	3.20	\$1,520.00
6/17/2021	FEP Litigation	Attend hearing on motion to reopen record of PI hearing	0.80	\$380.00
6/17/2021	JMS Litigation	Review issues related to Motion to Reopen the Record (.6); Attend Omnibus Hearing (.8)	1.40	\$350.00
6/21/2021	FEP Litigation	Review supplemental filing re: Trust discovery	0.20	\$95.00
6/22/2021	JMS Litigation	Review documents and research issues related to Rule 2004 Motion.	0.20	\$50.00
6/23/2021	FEP Litigation	Email to S. Zieg and E. Edwards re: potential motion filing	0.20	\$95.00

**Invoice**

Sander Esserman

Page 7

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/24/2021	JMS Litigation	Research and address issues related to Rule 2004 Motions.	0.80	\$200.00
6/24/2021	FEP Litigation	Email to S. Zieg, E. Bradley and E. Edwards re: discovery motions	0.20	\$95.00
6/24/2021	FEP Litigation	Call with S. Zieg re: debtors 2004 discovery motions	0.30	\$142.50
6/24/2021	FEP Litigation	Review draft motion re evidentiary issues	0.70	\$332.50
6/25/2021	JMS Litigation	Research and address issues related to Rule 2004 Motion.	3.40	\$850.00
6/28/2021	FEP Litigation	Review ACC 2004 motion re: defense files	1.30	\$617.50
6/28/2021	JMS Litigation	Research potential bankruptcy issues	0.40	\$100.00
6/29/2021	FEP Litigation	Review issues related to Debtors PIQ/Trust discovery motions	2.80	\$1,330.00
SUBTOTAL:			38.10	\$16,410.00
For professional services rendered			50.50	\$22,187.50

**Invoice**

Sander Esserman

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In Reference To: DBMP, LLC Chapter 11

Name	Timekeeper Summary	Hours	Rate	Amount
Felton Parrish		42.50	475.00	\$20,187.50
Jack Spencer		8.00	250.00	\$2,000.00



## **Exhibit A-3**

Alexander  
Ricks  
PLLC

August 25, 2021

**VIA ELECTRONIC MAIL**

**TO: Notice Parties**

Alexander Ricks PLLC  
1420 East Seventh Street, Suite 100  
Charlotte, North Carolina 28204

Main Tel 704.365.3656  
Main Fax 704.365.3676  
www.alexanderricks.com

**Felton E. Parrish**  
980.334.2001  
Felton.Parrish@alexanderricks.com

**RE: Monthly Compensation Statement – *In re DBMP, LLC*, Case No. 20-30080 (JCW) (Jointly Administered), U.S. Bankruptcy Court for the Western District of North Carolina (Charlotte Division)**

Alexander Ricks PLLC (“Alexander Ricks”) was retained as counsel to Sander L. Esserman, the legal representative for future claimants (the “Future Claimants’ Representative”) effective as of February 1, 2021 pursuant to the *Ex Parte Order Authorizing Substitution of Alexander Ricks PLLC As North Carolina Counsel For the Future Claimants’ Representative* dated February 5, 2021 [Docket No. 653]. Alexander Ricks hereby submits this Monthly Statement for Compensation and Reimbursement for the period from July 1, 2021 through July 31, 2021 (the “Fee Period”).

During the Fee Period, Alexander Ricks incurred fees of \$9,370.00 and expenses in the amount of \$0.00. Pursuant to the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* dated August 6, 2020 [Docket No. 402], retained professionals may request 90% of their fees and 100% of their expenses on a monthly basis. Accordingly, Alexander Ricks PLLC requests payment from the Debtor in the total amount of **\$8,433.00** which is calculated as follows: \$8,433.00 (90% of \$9,370.00) plus \$0.00 (100% of expenses).

Attached hereto and incorporated as part of this Monthly Compensation Statement is Alexander Ricks PLLC’s invoice for the Fee Period.

Sincerely,

/s/ Felton E. Parrish

Felton E. Parrish

Alexander Ricks PLLC

Document Page 27 of 48

**Invoice**

1420 E. 7th Street, Ste 100  
Charlotte, NC 28204  
704-365-3656

Sander Esserman  
Stutzman, Bromberg, Esserman & Plifka  
2323 Bryan Street, Suite 2200  
Dallas, TX 75201

Invoice # 44986

August 5, 2021

In Reference To: DBMP, LLC Chapter 11

Page 1

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**Current Billing Summary**

Current fees	<b>\$9,370.00</b>
Current expenses	<b>\$0.00</b>
Total Fees and Expenses this Invoice	<b>\$9,370.00</b>

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# Invoice

Sander Esserman

Page 2

In Reference To: DBMP, LLC Chapter 11

## Professional Services Itemization

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
<u>Case Administration</u>				
7/2/2021	FEP Case Administration	Review D. Schilli email re: request for continuance	0.10	\$47.50
7/5/2021	FEP Case Administration	Review emails from M. Fryling, J. Ellman and N. Ramsay re: hearing dates for PIQ motions	0.20	\$95.00
7/6/2021	FEP Case Administration	review emails re: hearing status	0.10	\$47.50
7/7/2021	FEP Case Administration	Conference with J. Spencer re: case status	0.20	\$95.00
7/8/2021	FEP Case Administration	review docket update	0.10	\$47.50
7/8/2021	FEP Case Administration	Review updated critical dates calendar from M. Moore	0.10	\$47.50
7/13/2021	FEP Case Administration	Review and respond to emails re: continuing hearing on motion to seal to 8/12	0.20	\$95.00
7/14/2021	FEP Case Administration	Review updated critical dates calendar	0.10	\$47.50
7/23/2021	FEP Case Administration	Review email from G. Cassada re: Trust Discovery depositions	0.10	\$47.50
7/23/2021	FEP Case Administration	Review motion to retain DRC for PIQ portal	0.10	\$47.50
7/27/2021	FEP Case Administration	participate in FCR team status call	0.60	\$285.00
7/28/2021	FEP Case Administration	Review updated critical dates calendar	0.20	\$95.00

# Invoice

Sander Esserman

Page 3

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
7/29/2021	FEP Case Administration	Review email from J. Ellman re: September hearing	0.10	\$47.50
SUBTOTAL:			2.20	\$1,045.00

## Fee Proceedings

7/1/2021	JMS Fee Proceedings	Draft Order granting fee applications for FCR professionals	1.60	\$400.00
7/2/2021	FEP Fee Proceedings	Review and finalize fee statements for FCR professionals	0.40	\$190.00
7/9/2021	FEP Fee Proceedings	Review and finalize orders granting fee applications for FCR professionals	0.90	\$427.50
7/14/2021	JMS Fee Proceedings	Draft Fee Statement for June 2021.	0.20	\$50.00
7/14/2021	FEP Fee Proceedings	Address fee statement issues	0.30	\$142.50
7/19/2021	FEP Fee Proceedings	Review monthly fee statement and email S. Esserman re: same	0.30	\$142.50
7/29/2021	FEP Fee Proceedings	Review and finalize monthly fee statements for FCR professionals	0.40	\$190.00
SUBTOTAL:			4.10	\$1,542.50

## Litigation

7/2/2021	FEP Litigation	Review PIQ discovery issues	2.30	\$1,092.50
7/5/2021	FEP Litigation	Review debtor motion to continue ACC 2004 motion	0.70	\$332.50
7/6/2021	FEP Litigation	Email to S. Zieg re: status of discovery responses and deadlines	0.20	\$95.00

**Invoice**

Sander Esserman

Page 4

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
7/6/2021	FEP Litigation	Review emails re: briefing and discovery deadlines	0.20	\$95.00
7/6/2021	FEP Litigation	Review draft order to reopen the record of the PI hearing	0.20	\$95.00
7/6/2021	FEP Litigation	review and finalize discovery responses	1.20	\$570.00
7/7/2021	JMS Litigation	Conference with F. Parrish regarding pending litigation.	0.20	\$50.00
7/14/2021	FEP Litigation	review email from J. Rubinstein re: trust discovery issue	0.10	\$47.50
7/15/2021	FEP Litigation	Review emails among debtor and DCPF counsel re: deposition issues	0.20	\$95.00
7/19/2021	FEP Litigation	Review Peterson depo notice and request for production of documents	0.20	\$95.00
7/20/2021	JMS Litigation	Draft and File Notice of Appearance.	0.20	\$50.00
7/29/2021	FEP Litigation	Review Debtor responses to discovery requests re: 2004 motions	0.60	\$285.00
7/29/2021	FEP Litigation	Finalize FCR responses and objections to Debtor's discovery requests re: 2004 motions	1.30	\$617.50
7/29/2021	JMS Litigation	Begin estimation research	0.70	\$175.00
7/29/2021	FEP Litigation	Review debtor reply in support of PIQ Motion	1.40	\$665.00
7/29/2021	FEP Litigation	Initial review of estimation motion and related issues	1.80	\$855.00
7/30/2021	FEP Litigation	Email to J. Spencer re: estimation research issue	0.70	\$332.50

**Invoice**

Sander Esserman

Page 5

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
SUBTOTAL:			12.20	\$5,547.50

Plan and Disclosure

7/24/2021	FEP Plan and Disclosure	Initial review of plan of reorganization (2.3); email to S. Esserman, E. Harron and S. Zieg re: same (.3)	2.60	\$1,235.00
SUBTOTAL:			2.60	\$1,235.00

For professional services rendered	21.10	\$9,370.00
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**Invoice**

Sander Esserman

Page 6

In Reference To: DBMP, LLC Chapter 11

Name	Timekeeper Summary	Hours	Rate	Amount
Felton Parrish		18.20	475.00	\$8,645.00
Jack Spencer		2.90	250.00	\$725.00



## **Exhibit A-4**

Alexander  
Ricks  
PLLC

September 30, 2021

**VIA ELECTRONIC MAIL**

**TO: Notice Parties**

Alexander Ricks PLLC  
1420 East Seventh Street, Suite 100  
Charlotte, North Carolina 28204

Main Tel 704.365.3656  
Main Fax 704.365.3676  
www.alexanderricks.com

**Felton E. Parrish**  
980.334.2001  
Felton.Parrish@alexanderricks.com

**RE: Monthly Compensation Statement – *In re DBMP, LLC*, Case No. 20-30080 (JCW) (Jointly Administered), U.S. Bankruptcy Court for the Western District of North Carolina (Charlotte Division)**

Alexander Ricks PLLC (“Alexander Ricks”) was retained as counsel to Sander L. Esserman, the legal representative for future claimants (the “Future Claimants’ Representative”) effective as of February 1, 2021 pursuant to the *Ex Parte Order Authorizing Substitution of Alexander Ricks PLLC As North Carolina Counsel For the Future Claimants’ Representative* dated February 5, 2021 [Docket No. 653]. Alexander Ricks hereby submits this Monthly Statement for Compensation and Reimbursement for the period from August 1, 2021 through August 31, 2021 (the “Fee Period”).

During the Fee Period, Alexander Ricks incurred fees of \$31,347.50 and expenses in the amount of \$0.00. Pursuant to the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* dated August 6, 2020 [Docket No. 402], retained professionals may request 90% of their fees and 100% of their expenses on a monthly basis. Accordingly, Alexander Ricks PLLC requests payment from the Debtor in the total amount of **\$28,212.75** which is calculated as follows: \$28,212.5 (90% of \$31,347.50) plus \$0.00 (100% of expenses).

Attached hereto and incorporated as part of this Monthly Compensation Statement is Alexander Ricks PLLC’s invoice for the Fee Period.

Sincerely,

/s/ Felton E. Parrish

Felton E. Parrish

Alexander Ricks PLLC

Document Page 35 of 48

**Invoice**

1420 E. 7th Street, Ste 100  
Charlotte, NC 28204  
704-365-3656

Sander Esserman  
Stutzman, Bromberg, Esserman & Plifka  
2323 Bryan Street, Suite 2200  
Dallas, TX 75201

Invoice # 45611

September 9, 2021

In Reference To: DBMP, LLC Chapter 11

Page 1

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**Current Billing Summary**

Current fees	<b>\$31,347.50</b>
Current expenses	<b>\$0.00</b>
Total Fees and Expenses this Invoice	<b>\$31,347.50</b>

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# Invoice

Sander Esserman

Page 2

In Reference To: DBMP, LLC Chapter 11

## Professional Services Itemization

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
<u>Case Administration</u>				
8/2/2021	FEP Case Administration	Email to M. Fryling re: continuance of hearing	0.20	\$95.00
8/3/2021	FEP Case Administration	review email from M. Fryling re: upcoming hearing as status conference	0.10	\$47.50
8/3/2021	FEP Case Administration	email to S. Zieg, E. Edwards and E. Bradley re: Motion to Continue	0.20	\$95.00
8/3/2021	FEP Case Administration	conference with J. Spencer re: status	0.30	\$142.50
8/3/2021	JMS Case Administration	meet with F. Parrish re: status of open issues	0.30	\$75.00
8/5/2021	FEP Case Administration	Review updated critical dates calendar from M. Moore	0.10	\$47.50
8/5/2021	FEP Case Administration	review revisions to draft motion to continue hearings	0.30	\$142.50
8/11/2021	FEP Case Administration	review hearing agenda	0.10	\$47.50
8/11/2021	FEP Case Administration	review updated critical dates calendar from M. Moore	0.20	\$95.00
8/12/2021	FEP Case Administration	Attend court status conference	1.40	\$665.00
8/12/2021	JMS Case Administration	Attend status hearing.	1.40	\$350.00
8/13/2021	FEP Case Administration	participate in court scheduling status conference	0.40	\$190.00

**Invoice**

Sander Esserman

Page 3

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/13/2021	FEP Case Administration	participate in FCR team status call	0.70	\$332.50
8/13/2021	JMS Case Administration	Attend continued status conference.	0.40	\$100.00
8/15/2021	FEP Case Administration	Review status of pending matters	0.70	\$332.50
8/17/2021	FEP Case Administration	Review updated critical dates calendar from M. Moore	0.20	\$95.00
8/20/2021	FEP Case Administration	participate in status meeting with YCST team	0.90	\$427.50
8/24/2021	FEP Case Administration	participate in FCR Team Conference Call	0.50	\$237.50
SUBTOTAL:			8.40	\$3,517.50
<u>Fee Proceedings</u>				
8/3/2021	FEP Fee Proceedings	Review and respond to email from L. Eden re: Ankura fee order	0.20	\$95.00
8/5/2021	FEP Fee Proceedings	review and finalize order for Ankura fee app	0.30	\$142.50
8/15/2021	FEP Fee Proceedings	prepare monthly fee statement	0.20	\$95.00
SUBTOTAL:			0.70	\$332.50
<u>Litigation</u>				
8/2/2021	FEP Litigation	participate in call with FCR and ACC counsel re: 2004 and estimation issues	0.90	\$427.50
8/3/2021	FEP Litigation	Review emails re: PI findings of fact/conclusions	0.20	\$95.00

**Invoice**

Sander Esserman

Page 4

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/4/2021	FEP Litigation	initial review of draft motion to continue PIQ/Trust hearing	0.60	\$285.00
8/4/2021	FEP Litigation	Review email from J. Spencer re: estimation research issue	0.40	\$190.00
8/4/2021	JMS Litigation	Research issues related to estimation motion	0.80	\$200.00
8/5/2021	FEP Litigation	Conference with J. Spencer re: estimation issues	0.40	\$190.00
8/5/2021	FEP Litigation	Review revised draft of motion to continue	0.60	\$285.00
8/5/2021	JMS Litigation	Research issues related to estimation proceedings.	3.90	\$975.00
8/5/2021	JMS Litigation	discuss estimation issues with F. Parrish	0.40	\$100.00
8/6/2021	FEP Litigation	email from S. Zieg re: motion to continue	0.10	\$47.50
8/6/2021	FEP Litigation	review and respond to email from S. Zieg re: injunction issues	0.30	\$142.50
8/6/2021	FEP Litigation	review further revised draft motion to continue 2004 motions	0.80	\$380.00
8/6/2021	FEP Litigation	review revised draft of motion to continue	0.40	\$190.00
8/10/2021	FEP Litigation	Review PI ruling and related issues	2.20	\$1,045.00
8/10/2021	JMS Litigation	Research issues related to potential appeal	1.10	\$275.00
8/11/2021	FEP Litigation	review email from T. Buchanan re: status	0.20	\$95.00

**Invoice**

Sander Esserman

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In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/11/2021	FEP Litigation	Email to S. Esserman, E. Harron and S. Zieg re: potential preliminary injunction appeal issues	1.30	\$617.50
8/11/2021	JMS Litigation	Research cases addressing standard for motion for extension of time.	0.40	\$100.00
8/11/2021	JMS Litigation	Research issues related to estimation proceedings.	3.10	\$775.00
8/11/2021	JMS Litigation	Draft Motion for Extension of Time to Appeal.	1.10	\$275.00
8/13/2021	JMS Litigation	Research issues related to estimation proceedings.	2.30	\$575.00
8/16/2021	JMS Litigation	meeting with F. Parrish re: estimation issues	0.30	\$75.00
8/16/2021	FEP Litigation	conference with J. Spencer re: estimation issues	0.30	\$142.50
8/16/2021	FEP Litigation	Revise draft extension motion (.4) and email J. Spencer re: same (.2)	0.60	\$285.00
8/16/2021	FEP Litigation	address potential appeal issues for PI order	1.30	\$617.50
8/16/2021	JMS Litigation	Revise Motion for extension of time to appeal.	1.50	\$375.00
8/16/2021	JMS Litigation	Research issues related to estimation motions.	0.50	\$125.00
8/17/2021	JMS Litigation	Draft Order granting motion for extension of time to file appeal.	0.60	\$150.00
8/17/2021	JMS Litigation	Research issues related to motion for estimation.	1.20	\$300.00
8/18/2021	JMS Litigation	conference with F. Parrish re: appeal issues	0.30	\$75.00

**Invoice**

Sander Esserman

Page 6

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/18/2021	FEP Litigation	Email to G. Thompson and R. Cox re: potential appeal issue	0.40	\$190.00
8/18/2021	FEP Litigation	Review potential appeal issues	0.80	\$380.00
8/18/2021	FEP Litigation	Email to E. Harron and S.Zieg re: potential appeal issues	0.20	\$95.00
8/18/2021	FEP Litigation	conference with J. Spencer re: appeal issues	0.30	\$142.50
8/18/2021	JMS Litigation	address issues re: potential appeal	1.70	\$425.00
8/19/2021	FEP Litigation	Discussion with S. Zieg re: appeal issues	0.30	\$142.50
8/19/2021	FEP Litigation	review research memo from J. Spencer	0.40	\$190.00
8/19/2021	FEP Litigation	Email to E. Harron re: research issues	0.50	\$237.50
8/19/2021	FEP Litigation	Review injunction appeal issues	0.60	\$285.00
8/19/2021	FEP Litigation	email to J. Spencer re: research issue	0.60	\$285.00
8/19/2021	FEP Litigation	Email to E. Harron re: issues with draft motions	0.60	\$285.00
8/19/2021	FEP Litigation	conference call with ACC and FCR counsel re: potential motions	0.70	\$332.50
8/19/2021	FEP Litigation	research issues re potential motions	1.20	\$570.00
8/19/2021	FEP Litigation	Review draft motions	2.10	\$997.50



**Invoice**

Sander Esserman

Page 7

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/19/2021	JMS Litigation	Research issues related to draft motions	3.40	\$850.00
8/19/2021	JMS Litigation	Address potential appeal issues	2.10	\$525.00
8/20/2021	JMS Litigation	conference with F. Parrish re: injunction issues	0.40	\$100.00
8/20/2021	FEP Litigation	conference with J. Spencer re: injunction issues	0.40	\$190.00
8/20/2021	FEP Litigation	Finalize ex parte motion to extend appeal period	1.30	\$617.50
8/20/2021	JMS Litigation	Address potential appeal issues	3.10	\$775.00
8/20/2021	FEP Litigation	Email to S. Esserman re: potential appeal issues	0.30	\$142.50
8/23/2021	FEP Litigation	review draft 2004 motion (.6); respond to email from R. Cox re; same (.1)	0.70	\$332.50
8/23/2021	FEP Litigation	Review draft motion (.4) and email comments to G. Thompson (.3)	0.70	\$332.50
8/23/2021	FEP Litigation	review potential appeal issues	1.80	\$855.00
8/23/2021	JMS Litigation	Correspond with U. Hamilton re: upcoming hearing	0.20	\$50.00
8/23/2021	FEP Litigation	review and respond to email from G. Thompson re: DBMP filings	0.20	\$95.00
8/23/2021	FEP Litigation	review final drafts of DBMP filings	1.30	\$617.50
8/25/2021	JMS Litigation	conference with F. Parrish re: potential appeal issues	0.20	\$50.00

# Invoice

Sander Esserman

Page 8

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/25/2021	FEP Litigation	Review and respond to email from C. Hardman re: appendix to standing motion	0.30	\$142.50
8/25/2021	FEP Litigation	revise draft motion to compel	0.60	\$285.00
8/25/2021	FEP Litigation	Review and revise draft motion re: exemplar claim files	1.20	\$570.00
8/25/2021	JMS Litigation	Draft Notice of Hearing.	0.20	\$50.00
8/25/2021	FEP Litigation	conference with J. Spencer re: potential appeal issues	0.20	\$95.00
8/25/2021	FEP Litigation	Draft motion to compel	6.30	\$2,992.50
8/25/2021	JMS Litigation	Research issues related to potential appeal	0.40	\$100.00
8/25/2021	JMS Litigation	Conference with F. Parrish regarding potential issues on appeal.	0.30	\$75.00
8/26/2021	JMS Litigation	Attend Aldrich Pump hearing.	1.00	\$250.00
8/26/2021	FEP Litigation	Call with S. Zieg re: discovery issues	0.20	\$95.00
8/26/2021	FEP Litigation	research re: discovery issue	2.40	\$1,140.00
8/26/2021	JMS Litigation	Prepare summary of Aldrich hearing (.3); Correspond with counsel for FCR via email regarding same (.1).	0.40	\$100.00
8/26/2021	FEP Litigation	revise motion to compel	1.30	\$617.50
8/27/2021	FEP Litigation	emails with S. Zieg re: discovery issues	0.20	\$95.00

**Invoice**

Sander Esserman

Page 9

In Reference To: DBMP, LLC Chapter 11

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/27/2021	JMS Litigation	Draft subpoena and supporting exhibit to Bates White, LLC.	1.30	\$325.00
8/29/2021	JMS Litigation	Revise Subpoena to Bates White.	0.50	\$125.00
8/30/2021	JMS Litigation	Review and analyze proposed findings from PI Order.	1.00	\$250.00
8/30/2021	FEP Litigation	participate in meet and confer with ACC and Debtor counsel re: standing, sub-con, and 2004 motions	0.40	\$190.00
8/30/2021	JMS Litigation	Research issues related to estimation proceedings.	2.00	\$500.00
SUBTOTAL:			74.80	\$27,497.50

For professional services rendered	83.90	\$31,347.50
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**Invoice**

Sander Esserman

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In Reference To: DBMP, LLC Chapter 11

Name	Timekeeper Summary	Hours	Rate	Amount
Felton Parrish		46.10	475.00	\$21,897.50
Jack Spencer		37.80	250.00	\$9,450.00

## **Exhibit B**

Cumulative Compensation Summary by  
Project Category

Period 5/1/2021 - 8/31/2021

Project Category	Total Hours for the Period	Total Hours from the Petition Date	Total Fees for the Period	Total Fees from the Petition Date
Asset Transactions	0.00	0.00	\$0.00	\$0.00
Case Administration and Business Operations	24.60	44.80	\$11,167.50	\$20,447.50
Fee Proceedings	11.60	20.00	\$4,970.00	\$8,892.50
Financing and Relief from Stay Proceedings	0.00	0.00	\$0.00	\$0.00
Litigation	145.60	398.30	\$57,977.50	\$166,760.00
Plan and Disclosure	2.60	2.60	\$1,235.00	\$1,235.00
Claims Administration	0.00	0.00	\$0.00	\$0.00
Other	0.00	0.00	\$0.00	\$0.00
		0.00		\$0.00
<b>Total</b>	<b>184.40</b>	<b>465.70</b>	<b>\$75,350.00</b>	<b>\$197,335.00</b>

Summary of Professionals

Professional	Title	Hourly Rate	Total Billed Hours	Total Fees
Felton Parrish	Partner	\$475.00	130.00	\$61,750.00
Jack Spencer	Associate	\$250.00	54.40	\$13,600.00

## **Exhibit C**

**Summary of Prior Fee Applications**

<b>Application</b>	<b>Period Covered</b>	<b>Fees Requested and Allowed</b>	<b>Expenses Requested and Allowed</b>
First Interim Application (Docket No. 891)	February 1, 2021 – April 30, 2021	\$121,985.00	\$361.89