

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 7
	§	
Country Fresh Holding Company, Inc. <i>et al</i> ¹	§	Case No. 21-30574
Debtors	§	Jointly Administered

**TRUSTEE’S STATUS REPORT TO THE COURT REGARDING ANKURA
CONSULTING GROUP**

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Janet S. Northrup, Chapter 7 Trustee of the estates of Country Fresh Holdings, Inc. *et al*, (“Trustee”), through counsel, and files this Status Report Regarding Ankura Consulting Group (“Ankura”), and shows:

1. The Court held a hearing on September 8, 2021, regarding, *inter alia*, the Trustee’s Application to Employ Ankura Consulting Group LLC as Special Consultant. *See Docket Nos. 799 and 939.*
2. During its ruling on September 8, 2021, the Court expressed several concerns and reservations regarding the Trustee’s application to employ Ankura. References herein are taken from the Court’s oral ruling found at *Docket No. 940*, and the time during the oral ruling when the comments by the Court were made. The Court stated, on the record (hereinafter, the “Record”), as follows:

¹ The Debtors in these Chapter 7 cases and the last four digits of each Debtors’ taxpayer identification number are as follows: Country Fresh Holding Company Inc. (7822); Country Fresh Midco Corp. (0702); Country Fresh Acquisition Corp. (5936); Country Fresh Holdings, LLC (7551); Country Fresh LLC (1258); Country Fresh Dallas, LLC (7237); Country Fresh Carolina, LLC (8026); Country Fresh Midwest, LLC (0065); Country Fresh Orlando, LLC (7876); Country Fresh Transportation LLC (8244) CF Products, LLC (8404) Country Fresh Manufacturing, LLC (7839); Champlain Valley Specialty of New York, Inc. (9030); Country Fresh Pennsylvania, LLC (7969); Sun Rich Fresh Foods (NV) Inc. (5526); Sun Rich Fresh Foods (USA) Inc. (0429); and Sun Rich Fresh Foods (PA) Inc. (4661).

- a. "I actually have a fairly substantial problem on where we're going on the Ankura matter." Record at 39:42.
 - b. "So, I have what is probably best described initially as a disclosure issue with respect to the retention of Ankura by the Trustee." Record at 40:47.
 - c. "At one point during the case, we found that Ankura had violated a court order with respect to the PACA claims." Record at 41:11
 - d. "At another point in the case, we found that Mr. Marotta's testimony regarding the KEIP and the arrangement of the KEIP was less than credible." Record at 41:24.
 - e. "I don't really see how the Trustee's decision to retain him [Marotta] gets made and where parties have a chance to object to that without that disclosure having been in the Application." Record at 41:37.
 - f. "It also raises the question in my mind of how much the estate either lost directly in cash or more likely lost because those events drove up the litigation costs in the case, and if the Trustee has a claim against Ankura for that then I don't see how we take up the retention because he's [Marotta] not disinterested at all, nor do I see how we approve fees under 5th Circuit law where it says you waive all the claims." Record at 41:52.
 - g. "Since the disclosure wasn't made in the first instance, it seems very hard for me to say that the Trustee can then retain them [Ankura] to do post-conversion work...If it was an actual disclosure problem, I want her [Trustee] to have an opportunity to consider whether this is something she wants to pursue or not." Record at 42:42.
 - h. "It's a major event in the case for me when my PACA order wasn't followed. And of course, we wrote a memorandum opinion about the KEIP, and we identified these problems with the credibility of Mr. Marotta." Record at 43:14.
 - i. "I need to be sure that they're [Ankura] disinterested or else the business judgment rule can't overcome an absence of disinterestedness. I need to give you [Trustee] a chance to read my show cause order and to listen to the hearing." Record at 45:30.
3. In response to the Court's concerns set forth in the Record, the Trustee and her counsel carefully reviewed, read, and/or listened to the following:
- a. *Docket No. 12*. Emergency Motion for Entry of an Order Authorizing the Debtors to Pay or Honor Certain Prepetition Shipping Charges. **Note: The Trustee believes this is what the Court referred to several times in the September 8, 2021, hearing as the "PACA" motion.**
 - b. *Docket No. 95*. Order Granting Emergency Motion for Entry of an Order Authorizing the Debtors to Pay or Honor Certain Prepetition Shipping Charges **Note: The Trustee believes this is what the Court referred to several times in the September 8, 2021, hearing as the "PACA" order and which the Court expressed concerns regarding Ankura's compliance.**

- c. *Docket No. 549*. Emergency Motion for Entry of Order Enforcing the Protections of Sections 362, 365, 525, and 541(c) of the Bankruptcy Code Pursuant to Section 105 of the Bankruptcy Code.
 - d. *Docket No. 552*. Order to Show Cause.
 - e. *Docket No. 564*. Audio recording of the Court's hearing and ruling on Docket Nos. 549 and 552.
 - f. *Docket No. 571*. Order Enforcing the Protections of Sections 362, 365, 525, and 541(c) of the Bankruptcy Code Pursuant to Section 105 of the Bankruptcy Code.
 - g. *Docket No. 275*. Emergency Motion for Entry of an Order (A) Authorizing and Approving the Debtor's Key Employee Incentive Plan and (B) Granting Related Relief.
 - h. *Docket No. 520*. Audio recording of the Court's hearing regarding Docket No. 275.
 - i. *Docket No. 771*. Memorandum Opinion related to Docket Nos. 275 and 520.
4. In response to the Court's concerns regarding how much cash the bankruptcy estates lost directly or through increased litigation costs caused by Ankura's actions regarding the KEIP and PACA/show cause issues, the Trustee and her counsel conducted a thorough investigation and review of the relevant fees charged by Debtor's counsel, the unsecured creditors committee's counsel, Ankura itself, and the Trustee's counsel. A chart showing the amounts the Trustee believes are directly attributable to the Court's concerns is attached hereto as Exhibit A.
5. In addition, the Trustee and her counsel have had extensive discussions and negotiations with Ankura's outside legal counsel, Mr. Strubeck at the O'Melveny & Myers LLP firm and Mr. Marotta regarding possible resolution of the issues raised by the Court, which as of the date of the filing of this Report are still ongoing. At all times, Ankura (through Mr. Marotta) and its counsel have fully cooperated with the Trustee in this investigation.
6. The Trustee takes the Court's concerns regarding lack of disclosure, possible causes of action, and potential damages to the bankruptcy estates extremely seriously, and is confident that Ankura does as well. It was never the Trustee's intent to minimize or obfuscate these issues in her application to retain Ankura.

7. In response to the Court's concerns, the Trustee will be filing a supplemental objection to Ankura's final fee application. In such supplemental objection, the Trustee will reiterate the review described above, and ask for a reduction in Ankura's fees equal to the total of the fees and costs described on Exhibit A attached hereto. If Ankura agrees to such a reduction, or if the Court ultimately orders it, the Trustee believes that the bankruptcy estates will have been adequately compensated in connection with the issues noted by the Court.
8. Inasmuch as a reserve or escrow fund has been established *and funded* to pay the fees of case professionals as part of the Carve-Out as defined in the Final DIP Order [*Docket No. 335*], and is therefore no longer part of the Lender's collateral, the Trustee will request that any reduction in Ankura's fees be paid over to or retained by the Trustee as unencumbered property of the bankruptcy estates to be distributed by the Trustee pursuant to the Bankruptcy Code. The Trustee anticipates these may be the only funds available to pay administrative claims in this case.

9. The Trustee has not made a final decision as to whether she will either amend the application to employ Ankura for post-conversion work or withdraw the application entirely. If she does decide to proceed with the application to employ Ankura, she intends to file supplemental disclosures, and will include all of the disclosures that the Court addressed in its rulings.

The Trustee files this status report to advise the Court of the results of her investigation per this Court's directives from the September 8, 2021 hearing. The Trustee will continue

to fulfill her statutory and fiduciary duties and responsibilities per the Bankruptcy Code and this Court's orders.

DATED: November 22, 2021.

Respectfully submitted,

/s/ Wayne Kitchens

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**ATTORNEYS FOR JANET S. NORTHRUP,
CHAPTER 7 TRUSTEE**

EXHIBIT "A"**Summary of Professional Time**

<u>Firm</u>	<u>KEIP</u>	<u>Transport Order</u>	<u>Sub-Total</u>
Foley Lardner (Dr counsel)	\$22,342.50	\$8,678.50	\$31,021.00
KT (UCC counsel)	\$18,490.00	\$7,714.00	\$26,204.00
Ankura (Dr CRO)		\$6,001.00	\$6,001.00
HWA (Te counsel) investigation*			\$19,892.50
Total cost to the estate			\$83,118.50

*HWA fees associated with this investigation will be sought in forthcoming fee application

UCC Counsel Time - KEIP

Date	Kilpatrick Townsend Entry for KEIP/Attorney	Time	Amount
4/12/2021	Telephone conference with H. Duran regarding status (.2); prepare for hearing (1.0); KEIP hearing (1.1); telephone conference with H. Duran regarding same (.2); exchanges with P. Rosenblatt regarding hearing (.1); exchanges regarding hearing transcript (.1); exchanges with debtor regarding order and review same (.2)./TCM	2.9	\$3,596.00
4/12/2021	Attend KEIP hearing (1.1); review and revise KEIP escrow form of order (.2); emails regarding same (.1)./PMR	1.4	\$1,477.00
4/12/2021	Draft email to Committee regarding KEIP hearing (.2); correspondence from Committee members and S. Hammond regarding budgets (.1)./KM	0.3	\$177.00
4/13/2021	Review KEIP reservation order./KM	0.1	\$59.00
4/19/2021	Email J. Melko regarding fill rate./TCM	0.1	\$124.00
4/19/2021	Email from T. Meyers regarding fill rate in connection with KEIP./KM	0.1	\$59.00
4/23/2021	Review PricewaterhouseCoopers email regarding fill rate./TCM	0.1	\$124.00
4/23/2021	Email from S. Hammond regarding fill rate in connection with KEIP./KM	0.1	\$59.00
4/26/2021	Emails regarding unresolved motion to seal KEIP objection./PMR	0.2	\$211.00
4/28/2021	Telephone conference with J. Duran regarding KEIP status (.2); exchanges with K. Moynihan regarding same (.1)./TCM	0.3	\$372.00
4/30/2021	Review Debtors' motion to enforce stay (.2); email to J. Melko regarding KEIP and interim comp (.1); correspondence with T. Meyers regarding same (.1)/KM	0.4	\$236.00
4/30/2021	Exchanges with PricewaterhouseCoopers regarding fill rate./TCM	0.1	\$124.00
5/7/2021	Email regarding fill rate calculations/TCM	0.1	\$124.00
5/7/2021	Email to J. Melko regarding KEIP exhibit./TCM	0.1	\$59.00
5/8/2021	Exchanges regarding KEIP calculations with PricewaterhouseCoopers./TCM	0.1	\$248.00
5/8/2021	Analyze Debtors' revised KEIP calculation./PMR	0.2	\$211.00

UCC Counsel Time - KEIP

5/10/2021	Email exchanges with J. Melko regarding fill rate calculation./TCM	0.2	\$248.00
5/10/2021	Emails regarding KEIP calculation/PMR	0.2	\$211.00
5/12/2021	Various exchanges with J. Melko and U.S. Trustee regarding fill rate./TCM	0.4	\$496.00
5/12/2021	Correspondence from T. Meyers and P. Rosenblatt regarding KEIP calculations (.2); review KEIP motion regarding same (.1); correspondence from J. Melko, M. Moore and H. Duran regarding KEIP exhibit (.2)./KM	0.5	\$295.00
5/12/2021	Telephone discussion with UST regarding KEIP exhibit (.2); email debtors counsel regarding objection to KEIP exhibit (.1)./PMR	0.3	\$316.50
5/17/2021	Various exchanges regarding KEIP supplement (.3); exchanges with J. Melko regarding fill rate issue (.1); review exhibit regarding same and notice of filing (.2)./TCM	0.6	\$744.00
5/17/2021	Correspondence from T. Meyers and P. Rosenblatt regarding KEIP exhibit (.1); correspondence with T. Meyers and P. Rosenblatt regarding KEIP supplemental objection (.6); review hearing audios regarding same (.9); call with J. Risener regarding same (.2); correspondence with J. Risener regarding same (.2); call with P. Rosenblatt regarding same (.1)./KM	2.1	\$1,239.00
5/17/2021	Draft post-hearing objection to KEIP (1.8); research legislative history regarding same (.5); emails regarding same (.2)./PMR	2.5	\$2,637.50
5/18/2021	Revise and edit KEIP supplement./TCM	0.9	\$1,116.00
5/18/2021	Correspondence from T. Meyers and P. Rosenblatt regarding KEIP supplemental objection./KM	0.2	\$118.00
5/18/2021	Revise supplemental KEIP objection (.8); emails regarding same (.1)./PMR	0.9	\$949.50
5/19/2021	Prepare and file objection./SG	0.5	\$167.50
5/19/2021	Exchanges with P. Rosenblatt and revise and edit KEIP objection./TCM	0.8	\$992.00
5/19/2021	Correspondence from T. Meyers and P. Rosenblatt regarding KEIP objection (.1); revise same (.1)./KM	0.2	\$118.00

UCC Counsel Time - KEIP

5/19/2021	Revise and finalize supplemental objection regarding KEIP (.6); emails regarding same (.2)./PMR	0.8	\$844.00
5/19/2021	Email to Committee regarding 5/18 hearing and KEIP Objection	0.2	\$118.00
3/25/3021	Review U.S. Trustee KEIP objection (.2); exchanges with P. Rosenblatt regarding same (.1); review PACA KEIP objection (.1); review U.S. Trustee objection to seal motion (.1)./TCM	0.5	\$620.00
Total		18.4	\$18,490.00

Exhibit "A"**UCC Counsel Time - Transport Order**

Date	Kilpatrick Townsend Entry for Transport Order/Show Cause/Attorney	Time	Amount
5/3/2021	Review exhibit lists (.2); review Epiq invoice and exchanges with K. Moynihan regarding same (.1); review emergency motion filed by debtors (.2); conference with P. Rosenblatt regarding hearing (.1);	0.9	\$1,116.00
5/3/2021	Review debtor's injunction request (.6); review shipper's opposition to injunction request (.8); attend go-to-meeting bankruptcy court hearing	3.4	\$3,587.00
5/5/2021	Exchanges with P. Rosenblatt regarding hearing and review carrier order (.2); exchanges with K. Moynihan regarding same	0.3	\$372.00
5/5/2021	Attend hearing./JRR	0.5	\$187.50
5/5/2021	Attend continued hearing on Shipper/Carrier injunction hearing (.5); emails regarding same	0.7	\$738.50
Totals		5.8	\$6,001.00

Ankura Time - Transport Order

<u>Date</u>	<u>Time Entry</u>	<u>Hours</u>	<u>Amount</u>
4/30/2021	Court Hearings - Filings and Litigation	1.4	\$1,617.00
4/30/2021	Court Hearings - Filings and Litigation	1.4	\$1,323.00
5/3/2021	Court Hearings - Filings and Litigation	1.2	\$1,386.00
5/3/2021	Court Hearings - Filings and Litigation	1.2	\$1,188.00
5/5/2021	Court Hearings - Filings and Litigation	0.6	\$693.00
5/5/2021	Court Hearings - Filings and Litigation	0.4	\$396.00
Total		6.2	\$6,603.00

Foley Lardner Time - KEIP

Date	Foley Lardner Entry for KEIP/Attorney	Time	Amount
4/12/2021	Prepare outline of closing argument for KEIP including record references (1.3);/JPME	1.3	\$1,176.50
4/12/2021	Prepare for and participate in hearing on KEIP motion (1.5); telephone conference with lenders' counsel regarding extension of challenge period and issues relating to same (.8); draft KEIP reservation order and circulate to parties in interest following direction from Court regarding same (.6)/MCM	2.9	\$1,624.00
4/12/2021	attendance at the court hearing on the cure objections and the KEIP motion (.9)/SB	0.9	\$558.00
4/12/2021	Emails with J. Weber regarding KEIP discussion and allocation issue (.3)/JPME	0.3	\$271.50
4/19/2021	Work with client to finalize and obtain releases from KEIP recipients./JM	0.5	\$275.00
5/7/2021	Emails from/to T. Meyers regarding budget (.2); series of emails to K. Moynihan regarding KEIP calculation, budget and interim fee procedure CNO (.4); email revised Ankura calculation of KEIP to Committee (.1); review markup of Challenge period stipulation (.4)/JPME	1.1	\$995.00
5/7/2021	review updated KEIP calculation (.3); emails with M. western regarding same (.2)/JPME	0.5	\$452.50
5/7/2021	email correspondence with various parties regarding KEIP calculations and telephone conference with Ankura regarding same (.5); prepare notice regarding KEIP calculation exhibit for filing with bankruptcy court (.4)/MCM	0.9	\$504.00
5/10/2021	Email from/to Committee counsel regarding KEIP schedule (.2); email to S. Marotta regarding Committee request (.1)/JPME	0.3	\$271.50
5/12/2021	work on issues in connection with KEIP exhibit requested by Court and objections by UCC and UST to same (.8)/MCM	0.8	\$448.00
5/12/2021	Email to S. Beausoleil and M. Moore regarding KEIP updated calculation./JPME	0.2	\$181.00
5/13/2021	work on KEIP exhibit issues prior to submission of same to bankruptcy court (.4)/MCM	0.4	\$224.00
5/17/2021	Conference call with client parties and Foley team regarding hearing preparation (.8); finalize and file notice of KEIP exhibit (.6)/MCM	1.4	\$784.00
5/17/2021	Emails with M. Moore regarding filing of updated KEIP exhibit (.2); several emails from/to Committee counsel regarding same (.2)/JPME	0.4	\$362.00
6/9/2021	Emails from/to W. Andersen regarding status of ruling on KEIP (.3)/JPME	0.3	\$271.50
6/15/2021	Email correspondence and analysis of issues relating to outstanding KEIP matter./MCM	0.5	\$280.00
Totals		12.7	\$8,678.50

Foley Lardner Time - Transport Order

Date	Foley Lardner Entry for Transport Order/Show Cause/Attorney	Time	Amount
4/29/2021	File Stipulation and Agreed Order (.2); revise proposed order for automatic stay/protections motion (.2); email correspondence with Foley team regarding filing of emergency motion (.5); file Notice	1.1	\$258.50
4/29/2021	Analysis of Emergency Motion for Entry of Order Enforcing the Protections of Sections 362, 365, 525, and 541(c) of the Bankruptcy Code for downloading, printing and organizing the cases cited for	0.6	\$177.00
4/30/2021	Continued calls with C. Hendricks (.4); review show cause order and critical vendor order (.5)./JPME	0.9	\$814.50
4/30/2021	Finalize and coordinate filing of motion to enforce (1.0); review show-cause order and confer with Foley team regarding same and preparation for hearing	1.8	\$1,008.00
5/1/2021	Review critical vendor order (.3); send relevant portion to T. Murray (.1); conference call with T. Murray and M. Moore regarding motion to enforce	1.4	\$1,267.00
5/1/2021	Email and telephone correspondence with Foley team regarding show-cause hearing and related issues (1.0); work on strategy in connection with	1.7	\$952.00
5/1/2021	Prepare for hearing on emergency motion./TAM	2.7	\$2,187.00
5/2/2021	Emails from/to T. Murray regarding Silchuk claim (.2); conference call with J. Goodwin to prepare for hearing (.7); conference call with S. Marotta, A. Dalsass and L. Fletcher to prepare S. Marotta for hearing on show cause orders regarding Stilchuk (.6); email E. Song and D. Adlerstein regarding APA/TSA (.3); review emails from D. Adlerstein and E.	2.2	\$1,991.00
5/2/2021	Prepare for hearing on emergency motion./TAM	5.7	\$4,617.00
5/3/2021	Email correspondence with Foley team in preparation for showcause hearing (.4); draft motion to seal exhibit in connection with same hearing in order to protect documents relating to key suppliers (.7); review and analyze response prior to hearing (.5); prepare for and participate in hearing on show-cause order from Court (2.0); follow-up email and telephone correspondence regarding same (.6);	4.7	\$2,632.00
5/4/2021	review email correspondence and outline in connection with closing on show-cause order for Wednesday (.7)./MCM	0.7	\$392.00

Foley Lardner Time - Transport Order

5/4/2021	Prepare for closing in emergency motion hearing (3.9); calls with respondent and buyer regarding resolution (.8); prepare closing argument (2.5);/TAM	7.2	\$5,835.00
5/5/2021	Email correspondence with T. Murray regarding proposed order to be uploaded regarding Debtors' protections motion (.2); file proposed order regarding Debtors' protections motion (.2); correspondence with T. Murray and J. Melko regarding same (.5); file proposed agreed order regarding protections motion and email same to Judge Isgur's case manager (.2); follow up email to Judge Isgur's case manager regarding incorrect order entered (.2)./JCH	1.3	\$305.50
Totals		32	\$22,436.50

HWA Time - Investigation Per Court Directive

<u>Date</u>	<u>Time Entry</u>	<u>Hours</u>	<u>Amount</u>
9/8/2021	Attend Foley and Ankura hearings and follow up with H. Emails to and from J. Weber and J. Melco regarding show	1.2	\$690.00 WK
9/8/2021	cause order and harm to the Estate; telephone conference Review docket nos. 552 and 549 in order to comply with the	0.5	\$287.50 WK
9/8/2021	Court's instructions; discuss same with H. McIntyre and Extended telephone conference with J. Melko regarding	1.2	\$690.00 WK
9/8/2021	ankura issues and next steps regarding the Court's directives. Prepare for and attend hearing on Foley fee application	0.4	\$230.00 WK
9/8/2021	Ankura fee application and application to employ Ankura.	1.4	\$665.00 HM
9/8/2021	Confer with Trustee regarding hearing as to Ankura issues Conference call with Weber, Myers, Hotz, H. McIntyre and	0.4	\$190.00 HM
9/9/2021	Trustee regarding Ankura, Foley and cash collateral issues. Review Ankura application to employ and also their fee	0.5	\$287.50 WK
9/9/2021	application and order in accordance with the Court's	0.7	\$402.50 WK
9/9/2021	Review show cause order regarding Ankura alleged Confer with Trustee regarding open issues including TSA	0.3	\$142.50 HM
9/9/2021	reconciliation and possible claims against Ankura per Judge Telephone conference with lenders regarding open issues	0.3	\$142.50 HM
9/9/2021	including TSA reconciliation, Ankura fee issue per Judge Isgur.	0.7	\$332.50 HM
9/10/2021	Exchange emails with Ankura regarding meeting.	0.1	\$47.50 HM
9/10/2021	Emails to and from L. Strubeck regarding Ankura matters. Emails to and from A. Dalsass regarding Court's directive and	0.3	\$172.50 WK
9/10/2021	Trustee's investigation into certain actions by Ankura.	0.3	\$172.50 WK
9/10/2021	Continue review of Ankura hearings and orders to fulfill	1.6	\$920.00 WK
9/13/2021	Telephone conference with Ankura regarding Isgur directive.	0.4	\$190.00 HM
9/13/2021	Confer with Trustee regarding approach to Ankura issue Telephone conference with L. Strubeck regarding issues	0.2	\$95.00 HM
9/13/2021	relating to Ankura and possible solutions. Conference call with Trustee, H. McIntyre, L. Strubeck and L.	0.5	\$287.50 WK
9/13/2021	Smith regarding their representation of Ankura, the Court's Review Court's concerns regarding Ankura employment and	0.5	\$287.50 WK
9/16/2021	fee application. Per Court's instruction, listen to show cause Meeting with Trustee and H. McIntyre regarding Ankura	0.7	\$332.50 HM
9/16/2021	application and the Court's issues with same and how to Emails to and from L. Krucks regarding Ankura issues;	0.8	\$460.00 WK
9/23/2021	telephone conference with Strubeck regarding same.	0.3	\$172.50 WK
9/24/2021	Telephone conference with L. Strubeck regarding Ankura Emails to and from L. Smith and L. Strubeck regarding Ankura	0.3	\$172.50 WK
9/29/2021	call and issues. Emails and telephone conferences with L. Smith regarding	0.3	\$172.50 WK
9/29/2021	Ankura issues. Emails to and from L. Krucks regarding Oswego lease assignment and issues with same and change relevant	0.2	\$115.00 WK
9/30/2021	documents to conform.	0.5	\$287.50 WK

HWA Time - Investigation Per Court Directive

10/4/2021	Telephone conference with Ankura counsel regarding next steps as to pending fee application to employ and \$114K.	0.4	\$190.00	HM
10/4/2021	Follow up call regarding Ankura problems with Smith and Strubeck.	0.5	\$287.50	WK
10/5/2021	Emails to and from L. Krucks regarding Ankura issues.	0.3	\$172.50	WK
10/25/2021	Telephone conference with W. Kitchen regarding notice to Court regarding Ankura investigation.	0.2	\$95.00	HM
10/25/2021	Continue work on Ankura status report including audio hearing review and notations on same.	2.8	\$1,610.00	WK
10/25/2021	Conference call with H. McIntyre and Trustee regarding Ankura issues.	0.4	\$230.00	WK
10/26/2021	Consider possible 549 cause of action against Ankura and transportation vendor regarding Court's directive into claims against Ankura.	0.5	\$237.50	HM
10/26/2021	Continue work on Ankura status report including audio hearing review and notations on same.	1.5	\$862.50	WK
10/27/2021	Confer with Trustee regarding Ankura issue.	0.6	\$285.00	HM
10/27/2021	Work on calculating professional fees associated with transportation vendor order and KEIP order.	0.2	\$95.00	HM
10/27/2021	Conference call with Trustee and H. McIntyre regarding Ankura issues.	0.6	\$345.00	WK
10/27/2021	Listen to multiple hearing on the transportation motion, show cause motion and KEIP hearing; review numerous pleadings all regarding Ankura status report.	4.2	\$2,415.00	WK
10/27/2021	Email to and from L. Strubeck and L. Smith regarding Ankura status report.	0.2	\$115.00	WK
10/28/2021	Review of billing records and preparation of spreadsheet regarding the same.	5.7	\$2,223.00	CA
10/28/2021	Review HWA time for fees spent on Ankura issues and 9/8/21 hearing directives.	0.3	\$142.50	HM
10/28/2021	Emails to and from L. Strubeck regarding Ankura issues and meeting to resolve same.	0.2	\$115.00	WK
10/28/2021	Continue work on Ankura status report; discuss same with H. McIntyre and Trustee.	1.1	\$632.50	WK
10/29/2021	Review of billing records and preparation of spreadsheet regarding the same related to supplemental objection to Ankura fees.	2.3	\$897.00	CA
10/29/2021	Confer with Trustee on open issues including Ankura.	0.2	\$95.00	HM
10/29/2021	Work in professional time spent on violation of Isiguro order and KEIP issue per Court's instruction.	1.9	\$902.50	HM
Total		38.7	\$19,892.50	