

**IN THE UNITED STATES BANKRUPTCY COURT
FOR WESTERN DISTRICT OF TEXAS
WACO DIVISION**

IN RE:	§	
LITTLE RIVER HEALTHCARE	§	CASE NO. 18-60526-RBK
HOLDINGS, LLC, <i>et al.</i> , ¹	§	
	§	CHAPTER 7
Debtors.	§	

**JACKSON WALKER LLP'S SECOND INTERIM FEE
APPLICATION FOR ALLOWANCE AND PAYMENT OF
FEES AND EXPENSES AS SPECIAL COUNSEL TO THE TRUSTEE
FOR THE PERIOD NOVEMBER 1, 2020 THROUGH JULY 31, 2021**

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within 21 days from the date of service, the relief requested herein may be granted without a hearing being held.

A timely filed response is necessary for a hearing to be held.

TO THE HONORABLE RONALD B. KING, CHIEF U.S. BANKRUPTCY JUDGE:

Jackson Walker LLP ("JW" or the "Firm"), as special counsel to James Studensky, the duly appointed Chapter 7 Trustee (the "Trustee") for Little River Healthcare Holdings, LLC, *et al.* (the "Debtors"), and hereby files his *Second Interim Fee Application for Allowance and Payment of Fees and Expenses as Special Counsel to the Trustee for the Period November 1, 2020 Through July 31, 2021* (the "Second Interim Fee Application") and requests approval and allowance of payment on an interim basis for professional fees earned in the amount of \$597,943.50 and

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Compass Pointe Holdings, LLC (1142), Little River Healthcare Holdings, LLC (7956), Timberlands Healthcare, LLC (1890), King's Daughters Pharmacy, LLC (7097), Rockdale Blackhawk, LLC (0791), Little River Healthcare - Physicians of King's Daughters, LLC (5264), Cantera Way Ventures, LLC (7815), and Little River Healthcare Management, LLC (6688)

reimbursement of actual and necessary expenses in the amount of \$7,117.24 for the period from November 1, 2020 through July 31, 2021 (the “Application Period”). As detailed herein, and pursuant to Local Rule 2016(a)(1), attached hereto as **Exhibit A** is the Fee Application Summary. As more fully described in **Exhibit A**, during the Application Period, JW has expended 1210.3 hours in representation of the Trustee during the Application Period. In support of the Second Interim Fee Application, JW respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1334. This Application is a “core” proceeding to be heard and determined by the Court pursuant to 28 U.S.C. § 157(b), and the Court may enter final orders for matters contained herein.

2. The statutory and legal predicates for the relief sought herein are §§ 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule 2016(a) of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Western District of Texas (the “Local Rules”).

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

FACTUAL BACKGROUND

4. On July 24, 2018 (the “Petition Date”), the Debtors each commenced a case by filing a voluntary petition for relief in this Court under chapter 11 of the Bankruptcy Code.

5. On July 27, 2018, the Court entered an order authorizing the joint administration of the chapter 11 cases for procedural purposes pursuant to Bankruptcy Rule 1015(b) [Docket No. 38]. On December 7, 2018, this Court entered its Order Converting Chapter 11 Cases to Chapter 7, and appointing the Trustee [Docket No. 547].

6. On June 10, 2020, the Trustee filed his *Application for Retention of Jackson Walker LLP Pursuant to 11 U.S.C. §327(a) to Pursue Chapter 5 Causes of Action* (“Retention Application”) [Docket No. 1118].

7. On July 6, 2020, the Court entered its *Order Approving Retention of Jackson Walker LLP Pursuant to 11 U.S.C. § 327(a) to Pursue Chapter 5 Causes of Action* (“Retention Order”) [Docket No. 1141].

8. On October 2, 2020, the Trustee filed his *First Supplemental Application for Retention of Jackson Walker LLP as Counsel to the Chapter 7 Trustee for Certain Health Law Matters* (“Supplemental Retention Application”) [Docket No. 1278].

9. On October 27, 2020, the Court entered its *Order Approving Supplemental Application for Retention of Jackson Walker LLP, as Counsel to the Trustee or Certain Health Law Matters* (“Supplemental Retention Order”) [Docket No. 1280]. The Retention Order and Supplemental Retention Order is attached hereto as **Exhibit B**.

10. On February 14, 2019, the Court entered its *Order Establishing Interim Compensation and Reimbursement of Expenses for Trustee and Professionals* (“Interim Compensation Order”) [Docket No. 785].

11. On July 23, 2020 and July 24, 2020, JW filed numerous adversary proceedings, asserting causes of action under chapter 5 of the Bankruptcy Code (“Preference Litigation”).

12. Additionally, on July 24, 2021, JW filed three (3) adversary proceedings, asserting causes of action under §§ 544, 548 and 550 of the Bankruptcy Code (“Fraudulent Litigation” and together with the Preference Litigation the “Adversary Proceedings”).

a. Description of Legal Services Provided to Trustee by JW

13. JW has represented the Trustee with respect to the Preference Litigation, including providing analyses of the Debtors' pre-petition payments and other matters, preparing and filing the complaints necessary to institute the Preference Litigation, serving demand letters on certain recipients of preferential payments, informally resolving some such matters, and continuing to prosecute the balance.

14. JW has represented the Trustee with respect to the Fraudulent Litigation, including providing analyses of the Debtors' pre-petition transfers and other matters, and preparing and filing the complaints necessary to institute the Fraudulent Litigation.

15. The blended rate of timekeepers is \$494.05. The Summary of Timekeepers for the professionals and paraprofessionals involved in the representation of the Trustee is attached hereto as **Exhibit C**.

16. This Second Interim Fee Application seeks authority to be paid on an interim basis all fees and expenses during the Application Period.

17. The Trustee has reviewed and approved this Second Interim Fee Application.

18. JW submitted monthly fee statements to the Trustee as allowed under the Interim Compensation Order. As to services provided with respect to the Preference Litigation, JW submits a Detailed Record of Fees as Special Counsel to the Trustee in the Preference Litigation for the Application Period, attached hereto as **Exhibit D**, as required under Local Rule 2016(a)(2) and (3). As to services provided with respect to the Fraudulent Litigation, JW Submits a Detailed Record of Fees as Special Counsel to the Trustee for Fraudulent Litigation for the Application Period, attached hereto as **Exhibit E**. All receipts for expenses in excess of \$100.00 will be made available upon request.

19. As of the filing of this Interim Fee Application, the Trustee continues to prosecute the Adversary Proceedings.

20. A Summary of Compensation Request by Project Category for the Preference Litigation, as required by the U.S. Trustee Guidelines is set forth below:

Task Code	Description	Hours	Billable Fees
B160	Retention and Fee Applications	4.1	\$1,618.50
TOTAL:		4.1	\$1,618.50

Task Code	Description	Hours	Billable Fees
B180	Avoidance Actions	529.4	\$288,483.00
TOTAL:		529.4	\$288,483.00

21. A Summary of Compensation Request by Project Category for the Fraudulent Litigation, as required by the U.S. Trustee Guidelines is set forth below:

Task Code	Description	Hours	Billable Fees
B110	Case Administration	0.2	\$69.00
TOTAL:		0.2	\$69.00

Task Code	Description	Hours	Billable Fees
B180	Avoidance Actions	676.6	\$307,773.00
TOTAL:		676.6	\$307,773.00

22. The services performed by JW were necessary to and were beneficial to the Trustee at the time which the services were rendered. All services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed. JW asserts that it has provided value to the Trustee as further explained below.

23. B110 – Case Administration: These fees include time spent obtaining and reviewing PACER dockets for upcoming deadlines and hearings, communicating with court staff, and preparing worksite for document production.

24. B160 – Employment and Fee Applications: These fees include preparation of JW first interim fee application.

25. B180 – Avoidance Actions: These fees include all services rendered by JW that deal with analysis, prosecution, and efforts related to the Adversary Proceedings, and may also include specific matters that are not readily classifiable into other more specific matters. The time expended by JW includes telephonic conferences with opposing counsel and parties-in-interest, drafting pleadings, preparing for and attending hearings, and addressing other matters relative to prosecution of the Adversary Proceedings. These fees also pertain to review and analysis of potential avoidance actions under Chapter 5 of the Bankruptcy Code to determine whether to bring such causes of action, analyzing defenses asserted to the various claims brought in the Preference Litigation, and negotiating settlements related to the Preference Litigation. Additionally, these fees also pertain to analysis of the potential fraudulent transfers under §§ 544, 548 and 550 of the Bankruptcy Code to determine whether to bring such causes of action and analyzing certain defenses asserted thereto.

EXPENSES INCURRED BY JW

26. JW has incurred \$7,117.24 in reasonable and necessary expenses relating to the representation of the Trustee in this case during the Application Period. Pursuant to the Supplemental Retention Order and the Interim Compensation Order, and subject to the Court's approval, JW is entitled to reimbursement of actual and necessary expenses.

27. JW has made effort to minimize both expenses and fees in these cases. The expenses incurred are necessary, reasonable, and justified under the circumstances.

LEGAL STANDARDS

28. JW provided necessary and beneficial services to the Trustee in myriad ways. The time JW spent on services rendered and the rates charged for such services were reasonable and necessary to fully prosecute the Adversary Proceedings, and to maximize the dividend to creditors, in line with the *Johnson*² factors adopted by the Fifth Circuit in *In re First Colonial Corp.*, 544 F.2d 1291, 1299 (5th Cir. 1977), as follows:

a. The Time and Labor Required.

29. As further illustrated by the fee breakdown in the Fee Application Summary, the amount of time spent by JW professionals and paraprofessionals on this case for the Application Period is 1210.3 hours.

b. The Novelty and Difficulty of the Questions Presented by the Case.

30. This case has presented unique questions of fact and law relevant to both bankruptcy and applicable non-bankruptcy law, including laws and issues related to the healthcare industry.

c. The Skill Requisite to Perform the Legal Services Properly.

31. JW possesses the skill required to properly perform the legal services involved, in particular bankruptcy law expertise and specifically significant experience in prosecution of chapter 5 avoidance actions (and their state law counterparts), fraudulent transfer litigation, as well as practice experience before this Court, and knowledge of the Local Rules.

² See *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974).

d. The Preclusion of Other Employment by the Attorneys due to Acceptance of the Case.

32. Attorneys at JW were necessarily precluded from employment on other cases by the size and exigency of these cases. These cases have moved at an expedient pace requiring quick attention and open availability from JW attorneys.

e. The Customary Fee for Similar Work in the Community.

33. The fees charged by JW compare favorably with fees charged by other counsel in similar cases in this jurisdiction. JW sets its fees consistent with available market data for similarly sized and situated firms given the years of experience of each attorney, and for Adversary Proceeding dockets of this size. In addition, JW employs associates, a legal assistant, and bankruptcy case clerk on this case in lieu of a single attorney, resulting in a blended rate of \$494.05 per hour. JW's blended rate compares favorably with hourly rates charged by local practitioners in this District.

f. Whether the Fees are Fixed or Contingent.

34. JW attorneys in these cases do not charge either fixed or contingent fees.

g. Time Pressures Imposed by the Client or Circumstances.

35. The circumstances of the bankruptcy cases imposed time pressures due to the need to take steps to help the Adversary Proceedings to progress at an expedient pace.

h. The Amount Involved and Results Obtained as a Result of the Attorney Services.

36. As a result of JW's services, strategy, and efficiency as counsel, the Trustee has made substantial progress in the Adversary Proceedings. During the Application Period, JW has been able to successfully settle over 90% of the Adversary Proceedings, including several at the demand letter stage, which resulted in the flow of funds from same into the chapter 7 estate.

i. The Experience, Reputation, and Ability of the Attorneys.

37. The JW attorneys involved in the work on behalf of the Trustee represent significant relevant experience in the particular area of bankruptcy law and avoidance law. The JW attorneys bring extensive experience in bankruptcy and healthcare law, and ongoing operations and have substantial experience practicing in this Court and extensive familiarity with applicable Fifth Circuit bankruptcy law necessary for the successful prosecution of the Adversary Proceedings.

j. The Undesirability of the Cases.

38. Every chapter 7 trustee representation can carry some risk due to the uncertainty of payment stemming from the unknown. These cases presented no additional undesirable elements.

k. The Nature and Length of the Professional Relationship with the Client.

39. On or about May 14, 2020, JW was engaged by the Trustee to assist in the prosecution of the Adversary Proceedings. In addition, on or about September 18, 2020, JW was engaged by the Trustee to provide representation with respect to matters related to the Healthcare Law Matters.

l. Awards in Similar Cases.

40. The fees herein requested are in line with fee awards approved in similar cases, by counsel with similar sophistication and relevant experience, particularly with respect to an Adversary Proceedings docket of this size and with respect to the Healthcare Law Matters.

41. In conclusion, the services provided by JW have been necessary to the prosecution of the Adversary Proceedings during the Fee Period, and beneficial at the time at which the services were rendered. Further, JW performed the services within a reasonable amount of time commensurate with the complexity, importance, nature of the problems, issues, and tasks. Finally,

the compensation sought is reasonable based on the customary compensation charged by comparably skilled practitioners of the district. JW requests that the Court determine that the nature, extent, and value of these services were appropriate under the circumstances at the time the services were rendered.

WHEREFORE, PREMISES CONSIDERED, Jackson Walker LLP requests that this Court enter an order (a) granting interim allowance and approval of compensation for professional services rendered during the Application Period in the amount of \$597,943.50, and reimbursement of actual and necessary expenses incurred by Jackson Walker LLP during the Application Period in the amount of \$7,117.24, (b) authorizing the Trustee to pay the fees and expenses as requested, and (c) granting such other and further relief as is just and proper.

Dated: December 14, 2021

JACKSON WALKER LLP
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Austin, TX 78701
(512) 236-2000 – Telephone
(512) 236-2002 – Facsimile

/s/ Jennifer F. Wertz

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Email: vanaya@jw.com

**COUNSEL FOR JAMES STUDENSKY,
CHAPTER 7 TRUSTEE**

Certificate of Service

I hereby certify that on the 14th day of December 2021, a true and correct copy of the foregoing was served via the Court's CM/ECF electronic notification system for the Western District of Texas upon all parties requesting service via same, and via U.S. Mail, postage paid upon the parties listed below. The Notice to Creditors attached hereto and the Fee Application Summary (Exhibit A to this Interim Fee Application) shall be served on all parties on the service matrix attached hereto by U.S. Mail, postage paid, within five business days of the date of filing.

Little River Healthcare Holdings, LLC
Attn: Ronald Winters, Restructuring Officer
1700 Brazos Ave
Rockdale, Texas 76567

James Studensky
Chapter 7 Trustee
3912 W Waco Drive
Waco, TX 76710

Office of the United States Trustee
Attn: Shane P. Tobin
003 San Jacinto, Room 230
Austin, TX 78701
Shane.P.Tobin@usdoj.gov

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Counsel for the Debtor

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Morris.Weiss@wallerlaw.com

/s/ Jennifer F. Wertz
Jennifer F. Wertz

Exhibit A

Fee Application Summary

IN THE UNITED STATES BANKRUPTCY COURT
FOR WESTERN DISTRICT OF TEXAS
WACO DIVISION

IN RE: §
LITTLE RIVER HEALTHCARE § CASE NO. 18-60526-RBK
HOLDINGS, LLC, *et al.*,¹ §
§ CHAPTER 7
Debtors. §

SECOND INTERIM FEE APPLICATION SUMMARY

- I. CLIENT: James Studensky, Chapter 7 Trustee
- II. REQUEST APPLICANT: Jackson Walker LLP
- III. TOTAL AMOUNT OF FEES REQUESTED:
- (a) Fees: \$597,943.50
- (b) Expenses: \$7,117.24
- (c) Prepetition retainer: None.
- (d) Time Period Covered: November 1, 2020 through July 31, 2021
- IV. BREAKOUT OF CURRENT APPLICATION

NAME	CAPACITY	TOTAL HOURS	RATE	TOTAL
Nathan T. Smithson	Attorney	3.9	\$815	\$3,178.50
Jennifer F. Wertz	Attorney	5.5	\$645	\$3,547.50
Joshua A. Romero	Attorney	125.1	\$625	\$78,187.50
Sara Harris	Attorney	0.9	\$615	\$553.50
Jack E. Skaggs	Attorney	51.9	\$600	\$31,140.00
Vienna F. Anaya	Attorney	441.4	\$585	\$258,219.00
Michael Roberts	Attorney	66	\$565	\$37,290.00
Victoria N. Argeroplos	Attorney	4.1	\$495	\$2,029.50
Tiara E. Seals	Attorney	1.2	\$400	\$480.00
Jean R. Phillips	Attorney	15.5	\$465	\$7,207.50
Ashley Withers	Attorney	51.6	\$465	\$23,994.00
Peter C. Hansen	Attorney	14.1	\$435	\$6,133.50

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Compass Pointe Holdings, LLC (1142), Little River Healthcare Holdings, LLC (7956), Timberlands Healthcare, LLC (1890), King's Daughters Pharmacy, LLC (7097), Rockdale Blackhawk, LLC (0791), Little River Healthcare - Physicians of King's Daughters, LLC (5264), Cantera Way Ventures, LLC (7815), and Little River Healthcare Management, LLC (6688)

NAME	CAPACITY	TOTAL HOURS	RATE	TOTAL
Daniela Mondragon	Attorney	51.1	\$435	\$22,228.50
Abigail Griffith	Attorney	78.7	\$435	\$34,234.50
Tori B. Coates	Attorney	13.6	\$400	\$5,440.00
Caren Z. Luckie	Staff Attorney	0.9	\$310	\$279.00
Gavin B. Justiss	Research Attorney	0.4	\$310	\$124.00
Sam Richards	Staff Attorney	138.5	\$295	\$40,857.50
Anais O. Stevens	Clerk	7.7	\$290	\$2,079.00
Duane C. Lites	Lit Support	1.6	\$380	\$608.00
Michael Wilkins	Lit Support	86.2	\$345	\$29,739.00
Miguel Villalpando	Lit Support	3.1	\$310	\$961.00
Leo Gonzalez	Lit Support	1.8	\$285	\$513.00
Deborah Williams	Paralegal	0.8	\$280	\$224.00
Kendra E. Gradney	Legal Assistant	42.6	\$195	\$8,307.00
Daniela M. Trevino	Case Clerk	2.1	\$185	\$388.50
Totals		1210.3		\$597,943.50

V. MINIMUM FEE INCREMENT: 1/10 hour

VI. EXPENSES: \$7,117.24

VII. TOTAL FEES AND EXPENSES: \$605,060.74

VIII. AMOUNT ALLOCATED FOR PREPARATION OF THIS FEE APPLICATION – Estimated 3.5.

IX. PRIOR APPLICATIONS: \$142,369.90

X. OTHER CO-EQUAL OF ADMINISTRATIVE CLAIMANTS IN THIS CASE:

The Trustee will be entitled to his statutory commission. Brian Cumings and Graves Dougherty Hearon & Moody, P.C. is also counsel to the Trustee. In addition, Centurion Service Group, LLC dba Centurion Equipment Auctions, LLC as Auctioneer for the Trustee; Ryan Downton and the Law Offices of Ryan Downton, as Special Counsel to the Trustee; Pud Owens-Judith Matula Realty, as realtor to the Trustee; Keller Williams as realtor to the Trustee; George C. DeReese, Hr. CPA, PLLC, as accountant. JW understands that the Trustee may hire additional professionals who would be entitled to administrative claims. The Trustee anticipates that allowance of this Application will not result in the bankruptcy estates not being able to pay all co-equal or superior administrative claims in these cases.

XI. SUMMARY OF SERVICES:

Among other things, JW has represented the Trustee with respect to the Adversary Proceedings, including providing analysis of the Debtors' pre-petition payments and other matters, preparing and filing the complaints necessary to institute the Adversary Proceedings, serving demand letters on certain recipients of preferential payments, informally resolving some such matters, and continuing to prosecute the balance. The services performed by JW were necessary and beneficial to the Trustee and these estates at the time which the services were rendered. All services performed by JW were performed within a reasonable amount of time commensurate with the complexity, importance, timing, and nature of the Adversary Proceedings. JW respectfully asserts that it has provided value to these estates as set forth in the below:

ADVERSARY PROCEEDINGS			
Task Code	Description	Hours	Billable Fees
B180	Avoidance Actions	529.4	\$288,483.00
TOTAL:		529.4	\$288,483.00

ADVERSARY PROCEEDINGS			
Task Code	Description	Hours	Billable Fees
B160	Retention and Fee Applications	4.1	\$1,618.50
TOTAL:		4.1	\$1,618.50

FRAUDULENT PROCEEDINGS			
Task Code	Description	Hours	Billable Fees
B110	Case Administration	0.2	\$69.00
TOTAL:		0.2	\$69.00

FRAUDULENT PROCEEDINGS			
Task Code	Description	Hours	Billable Fees
B180	Avoidance Actions	676.6	\$307,773.00
TOTAL:		676.6	\$307,773.00

1. B110 – Case Administration: These fees include time spent obtaining and reviewing PACER dockets for upcoming deadlines and hearings, communicating with court staff, and preparing worksite for document production.

2. B160 – Employment and Fee Applications: These fees include preparation of JW first interim fee application.

3. B180 – Avoidance Actions: These fees include all services rendered by JW that deal with analysis, prosecution, and efforts related to the Adversary Proceedings, and may also include specific matters that are not readily classifiable into other more specific matters. The time expended by JW includes telephonic conferences with opposing counsel and parties-in-interest, drafting pleadings, preparing for and attending hearings, and addressing other matters relative to prosecution of the Adversary Proceedings. These fees also pertain to review and analysis of potential avoidance actions under Chapter 5 of the Bankruptcy Code to determine whether to bring such causes of action, analyzing defenses asserted to the various claims brought in the Preference Litigation, and negotiating settlements related to the Preference Litigation. Additionally, these fees also pertain to analysis of the potential fraudulent transfers under §§ 544, 548 and 550 of the Bankruptcy Code to determine whether to bring such causes of action and analyzing certain defenses asserted thereto.

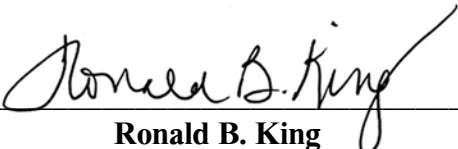
Exhibit B

Retention Orders



The relief described hereinbelow is SO ORDERED.

Signed July 06, 2020.


 Ronald B. King
 Chief United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
 WESTERN DISTRICT OF TEXAS
 WACO DIVISION

In Re:	§	Chapter 7
	§	
LITTLE RIVER HEALTHCARE	§	Case No. 18-60526-rbk
HOLDINGS, LLC, <i>et al.</i> ¹	§	
	§	(Jointly Administered)
Debtors.	§	

**ORDER APPROVING RETENTION OF JACKSON WALKER, LLP PURSUANT TO 11
U.S.C. §327(a) TO PURSUE CHAPTER 5 CAUSES OF ACTION**

ON THIS DAY, the Court considered the *Application for Retention of Jackson Walker, LLP Pursuant to 11 U.S.C. § 327(a) to Pursue Chapter 5 Causes of Action* (the “Application”) [Dkt. No. 1118] and the responses, if any. The Court finds that the Application has merit and should be and hereby is GRANTED.

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Compass Pointe Holdings, LLC (1142), Little River Healthcare Holdings, LLC (7956), Timberlands Healthcare, LLC (1890), King’s Daughters Pharmacy, LLC (7097), Rockdale Blackhawk, LLC (0791), Little River Healthcare - Physicians of King’s Daughters, LLC (5264), Cantera Way Ventures, LLC (7815), and Little River Healthcare Management, LLC (6688).

ORDERED, that the employment of Jackson Walker, LLC (“JW”) as counsel for the Trustee under the engagement letter attached as Exhibit A to the Application, be, and is hereby, approved.

ORDERED, that final compensation for services provided by JW will be paid upon application to this Court only after notice and hearing, pursuant to 11 U.S.C. §330 and the requirements of any other applicable law.

#

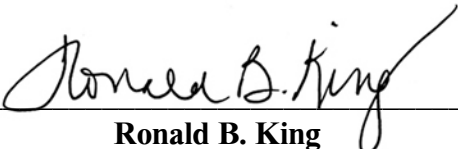
Order Prepared by Counsel for Ch. 7 Trustee

Brian T. Cumings
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Graves Dougherty Hearon & Moody, P.C.
401 Congress Ave., Suite 2700
Austin, Texas 78701
512.480.5626
512.536.9926 (Fax)
Email: bcumings@gdhm.com



The relief described hereinbelow is SO ORDERED.

Signed October 27, 2020.


 Ronald B. King
 Chief United States Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE WESTERN DISTRICT OF TEXAS
 WACO DIVISION**

LITTLE RIVER HEALTHCARE	§	
HOLDINGS, LLC, <i>et al.</i> ¹	§	CASE NO. 18-60526-RBK
	§	
DEBTORS.	§	CHAPTER 7

**ORDER APPROVING SUPPLEMENTAL APPLICATION
 FOR RETENTION OF JACKSON WALKER, LLP, AS COUNSEL
 TO THE CHAPTER 7 TRUSTEE FOR CERTAIN HEALTH LAW MATTERS**

ON THIS DAY, the Court considered the First Supplemental Application for Retention of Jackson Walker LLP, as Counsel to the Chapter 7 Trustee for Certain Health Law Matters (the “First Supplemental Application”), and the responses, if any. The Court finds that the Application has merit and should be and hereby is GRANTED; it is further

ORDERED, that the employment of Jackson Walker LLC (“JW”) as counsel for the

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Compass Pointe Holdings, LLC (1142), Little River Healthcare Holdings, LLC (7956), Timberlands Healthcare, LLC (1890), King’s Daughters Pharmacy, LLC (7097), Rockdale Blackhawk, LLC (0791), Little River Healthcare - Physicians of King’s Daughters, LLC (5264), Cantera Way Ventures, LLC (7815), and Little River Healthcare Management, LLC (6688).

Trustee under the engagement letter attached as Exhibit A to the First Supplemental Application, be, and is hereby, approved; and it is further

ORDERED, that final compensation for services provided by JW will be paid upon application to this Court only after notice and hearing, pursuant to 11 U.S.C. §330 and the requirements of any other applicable law.

###

Order prepared by:

/s/ Brian T. Cumings

Brian T. Cumings

State Bar No. 24082882

GRAVES, DOUGHERTY, HEARON & MOODY, P.C.

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COUNSEL FOR JAMES STUDENSKY, CHAPTER 7 TRUSTEE

Exhibit C

Summary of Timekeepers Included in Interim Fee Application

NAME	TITLE OR POSITION	DEPARTMENT , GROUP, OR SECTION	DATE OF FIRST ADMISSION	FEES BILLED IN THIS APPLICATION	HOURS BILLED IN THIS APPLICATION	HOURLY RATE BILLED IN THIS APPLICATION	HOURLY RATE BILLED IN FIRST INTERIM APPLICATION	NUMBER OF RATE INCREASES SINCE CASE INCEPTION
Nathan T. Smithson	Partner	Tax	11/5/2004	\$3,178.50	3.9	\$815.00	\$815.00	N/A
Jennifer F. Wertz	Partner	Bankruptcy	11/4/2011	\$3,547.50	5.5	\$645.00	\$645.00	N/A
Joshua A. Romero	Partner	Litigation	11/5/2004	\$78,187.50	125.1	\$625.00	\$625.00	N/A
Sara Harris	Associate	Labor & Employment	11/2/2012	\$553.50	0.9	\$615.00	\$615.00	N/A
Jack Skaggs	Partner	Litigation	11/4/2005	\$31,140.00	51.9	\$600.00	\$600.00	N/A
Vienna F. Anaya	Associate	Bankruptcy	5/18/2016	\$258,219.00	441.4	\$585.00	\$585.00	N/A
Michael Roberts	Associate	Litigation	11/2/2012	\$37,290.00	66.0	\$565.00	\$565.00	N/A
Victoria N. Argeroplos	Associate	Bankruptcy	11/3/2017	\$2,029.50	4.1	\$495.00	\$495.00	N/A
Jean Phillips	Associate	Litigation	11/2/2018	\$7,207.50	15.5	\$465.00	\$465.00	N/A
Ashley Withers	Associate	Tax	11/4/2011	\$23,994.00	51.6	\$465.00	\$465.00	N/A
Daniela Mondragon	Associate	Litigation	11/2/2018	\$22,228.50	51.1	\$435.00	\$435.00	N/A
Abigail Griffith	Associate	Litigation	5/3/2019	\$34,234.50	78.7	\$435.00	\$435.00	N/A
Peter Hansen	Sr. Counsel	Litigation	12/11/2008	\$6,133.50	14.1	\$435.00	\$435.00	N/A
Tori Coates	Associate	Litigation	10/30/2020	\$5,440.00	13.6	\$400.00	\$400.00	N/A
Tiara E. Seals	Associate	Litigation	12/4/2020	\$480.00	1.2	\$400.00	\$400.00	N/A
Gavin Justiss	Research Attorney	Library	11/6/2009	\$124.00	0.4	\$310.00	\$310.00	N/A
Caren Luckie	Staff Attorney	Library	11/2/1990	\$279.00	0.9	\$310.00	\$310.00	N/A
Samuel Richards	Attorney	Litigation	11/3/2017	\$40,857.50	138.5	\$295.00	\$295.00	N/A
Anais Stevens	Clerk	Litigation	N/A	\$2,079.00	7.7	\$270.00	\$270.00	N/A
Duane Lites	Lit Support	IT	N/A	\$608.00	1.6	\$380.00	\$380.00	N/A
Miguel Villalpando	Lit Support	IT	N/A	\$961.00	3.1	\$310.00	\$310.00	N/A
Mike Wilkins	Lit Support	IT	N/A	\$29,739.00	86.2	\$345.00	\$345.00	N/A
Leo Gonzalez	Lit Support	IT	N/A	\$513.00	1.8	\$285.00	\$285.00	N/A
Deborah Williams	Paralegal	Litigation	N/A	\$224.00	0.8	\$280.00	\$280.00	N/A
Kendra Gradney	Legal Assistant	Bankruptcy	N/A	\$8,307.00	42.6	\$195.00	\$195.00	N/A
Daniela Trevino	Case Clerk	Bankruptcy	N/A	\$388.50	2.1	\$185.00	\$185.00	N/A
Total				\$597,943.50	1210.3			

Exhibit D

**Detailed Record of Fees as Special Counsel to the Trustee in the Preference Litigation for
the Application Period**



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00001-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1793775
Invoice Date: 09/03/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Preference Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending November 30, 2020:

INVOICE SUMMARY

Total Fees	\$46,452.50
Total Expenses	45.11
Total Due This Invoice:	\$46,497.61

Reference No.:

Invoice No: 1793775

156819-00001-JFW1

Page 2

Invoice Date: 09/03/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Fee/Employment Applications:</u>				
11/30/20	K. Gradney	1.5	292.50	Update Jackson Walker first interim fee application.
Total Fee/Employment Applications		1.5	\$ 292.50	
<u>Avoidance Action Analysis:</u>				
11/01/20	K. Gradney	0.9	175.50	Review recently entered scheduling orders for various adversary proceedings, and update calendar with relevant deadlines.
11/02/20	V. Anaya	6.7	3,919.50	Prepare stipulation of extension for three stryker cases (0.2); Review issues with respect to new value for Zimmer claims and respond to counsel for same (1.8); Review analysis provided by Siemens and others with defenses (2.9); Prepare form settlement agreement (1.0); Prepare discovery requests to Enterprise (0.5); Correspond with J. Studensky regarding Arthrex settlement acceptance and provide with draft settlement agreement (0.3).
11/02/20	D. Trevino	0.5	92.50	Review docket in main case to determine bar date for filing claims following conversion of case and other related deadlines (.4); brief conversation with V Anaya regarding same (.1).
11/02/20	K. Gradney	0.2	39.00	Prepare for filing various stipulations extending answer date to complaint.
11/04/20	V. Anaya	0.2	117.00	Review email from counsel to McGinnis with preference defense information.
11/05/20	V. Anaya	2.6	1,521.00	Review R. McGinnis preference defense information (0.7); Call with counsel to same (0.4); Review Motion to Dismiss filed by Downton (0.5); Call with counsel to Simply Direct (0.2); Review Motion to Dismiss filed by William Kloppe (0.8).
11/06/20	V. Anaya	0.2	117.00	Correspond with J. Hammersmith regarding document search.
11/08/20	K. Gradney	0.6	117.00	Review scheduling orders and update calendar with dates and deadlines.
11/09/20	V. Anaya	1.9	1,111.50	Correspond with counsel to Amerisource (0.2); Prepare stipulations of dismissal for Male (0.2); Prepare same for Mitchell (0.2); Prepare settlement agreement with Arthrex (1.0); Call with J. Hammersmith regarding discovery requests (0.3).

Reference No.:

Invoice No: 1793775

156819-00001-JFW1

Page 3

Invoice Date: 09/03/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
11/09/20	V. Anaya	5.0	2,925.00	Correspond with counsel to Wright, Bhatt, and Cox (0.2); Prepare settlement agreement for Zimmer (0.3); Correspond with counsel to Zimmer regarding same (0.2); Call with D. Mondragon about response to Kloppe Motion to Dismiss (0.2); Review Kloppe information (2.0); Review Medtronic ordinary course of business defense (1.3); Review Hammes offer and correspond with J. Studensky regarding same (0.4); Review Equity Bastrop and Simply Direct stipulation to extend (0.4).
11/09/20	K. Gradney	0.2	39.00	Prepare for filing stipulation extending time for Defendant Updax to answer complaint (.1); review and prepare for filing stipulation of dismissal in Mitchell adversary (.1).
11/10/20	V. Anaya	4.6	2,691.00	Review executed settlement agreement from Arthrex (0.2); Correspond with Court regarding Kloppe motion to dismiss (0.2); Correspond with Equity Bastrop regarding extension (0.1); Prepare Hammes settlement agreement (0.5); Prepare agreed continuance for Kloppe Motion (0.7); Review Downton information in preparation for hearing on Motion (1.8); Correspond with J. Studensky regarding Kloppe motion (0.6); Review Kloppe information in preparation for response (0.5).
11/10/20	K. Gradney	0.2	39.00	Prepare for filing stipulation extending answer deadline (.1); review and finalize for filing motion to continue hearing on Defendant's motion to dismiss (.1).
11/11/20	V. Anaya	0.2	117.00	Correspond with counsel to Hammes about settlement agreement.
11/11/20	K. Gradney	0.6	117.00	Draft and prepare for filing statement regarding consent in multiple adversary cases.
11/12/20	V. Anaya	4.4	2,574.00	Review outstanding items (0.5); Review outstanding enterprise issues and determine information needed (0.9); Prepare rule 26 for agilent (0.3); Review defense information for same (0.4); Call with counsel to enterprise (0.3); Prepare rule 26 disclosures for Beckman (0.3); Prepare same for Engage (0.3); Prepare same for Janelle house (0.3); Prepare same for Georgetown (0.3); Review defenses related to Masergy (0.8).
11/12/20	K. Gradney	0.3	58.50	Prepare draft of notice to reset hearing on Defendant's Motion to Dismiss (.2); finalize for filing (.1).
11/13/20	V. Anaya	2.9	1,696.50	Review information provided by Pharmerica regarding defenses (0.2); Call regarding outstanding items with J. Wertz (0.5); Begin preparing for Downton motion to dismiss hearing (2.2).

Reference No.:

Invoice No: 1793775

156819-00001-JFW1

Page 4

Invoice Date: 09/03/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
11/16/20	V. Anaya	7.7	4,504.50	Prepare for hearing on motion to dismiss (2.5); Review information regarding tax distributions and tax statements related to Downton (5.2).
11/17/20	N. Smithson	0.8	652.00	Review and proposed revisions to memorandum regarding partnership tax operations and rationale for distributions.
11/17/20	V. Anaya	6.5	3,802.50	Continue to review information related to Downton payments (1.6); Prepare for Motion to Dismiss hearing (3.9); Attend hearing on Downton Motion to Dismiss (1.0).
11/17/20	V. Anaya	0.2	117.00	Prepare stipulation for extension with Texas Mutual Insurance (0.1); Prepare same for Dahill (0.1).
11/18/20	V. Anaya	0.4	234.00	Call with M. Roberts regarding discovery for fraudulent transfer cases (0.2); Correspond with J. Hammersmith regarding conducting searches of server (0.2).
11/19/20	V. Anaya	4.8	2,808.00	Review and revise Kloppe response to motion to dismiss (4.8).
11/19/20	V. Anaya	1.7	994.50	Draft Rule 27 Disclosures for Central Texas Pathology (0.2); Prepare Stipulations to extend time with stryker (0.2); Review and revise outstanding items and prepare action item list (1.3).
11/20/20	V. Anaya	5.8	3,393.00	Review and revise response to Kloppe Motion to Dismiss (5.8).
11/20/20	V. Anaya	0.9	526.50	Review and revise Hammes settlement agreement to incorporate all defendants and additional related parties.
11/20/20	V. Anaya	0.2	117.00	Prepare action item list for outstanding issues in adversary proceedings.
11/20/20	K. Gradney	0.5	97.50	Finalize for filing response to Downton motion to dismiss (.2); prepare for filing stipulation extending time for Met Life to answer complaint (.1); prepare for filing multiple stipulations for Stryker to answer complaint (.2).
11/23/20	V. Anaya	1.9	1,111.50	Prepare extension stipulations for multiple adversaries, including Medtronic, Greenway, Bio-Rad, Central Texas Oncology, Hologic, Zimmer, Praxair, Pharmerica, 3M, and Simply Direct.
11/23/20	V. Anaya	1.0	585.00	Prepare discovery requests for Cox, Wright, Bhatt, JWC Rentals, McGinnis, and Massergy adversary proceedings.

Reference No.:

Invoice No: 1793775

156819-00001-JFW1

Page 5

Invoice Date: 09/03/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
11/23/20	V. Anaya	3.2	1,872.00	Prepare amended complaint with respect to Healthcare Trust Inc. adversary proceeding (0.3); Draft motion for leave to file amended complaint for same (1.8); Draft motion to dismiss one of the engage adversary proceeding defendants (0.2); Review and revise Motion for Default Judgment against Abbvie (0.9).
11/23/20	K. Gradney	0.5	97.50	Prepare for filing stipulations to extend time to answer complaint on behalf of Greenway, Medtronic and Hologic (.2); finalize for filing motion for leave to file amended complaint (.3);
11/24/20	V. Anaya	5.5	3,217.50	Review and revise default judgment for Regus Corporation and related attachments (3.5); Prepare same for Abbvie (1.4); Correspond with counsel for Abbvie (0.2); Finalize settlement agreement with Hammes (0.4).
11/24/20	V. Anaya	0.2	117.00	Update status chart.
11/25/20	V. Anaya	1.8	1,053.00	Draft agreed scheduling order for McGinnis adversary (1.2); Prepare list of outstanding items related to all adversary proceedings (0.3); Draft extension stipulations for Med One, Leica, and RevMD adversaries (0.3).
11/25/20	K. Gradney	0.3	58.50	Finalize and prepare for filing motion for default judgment against Regus (.2); coordinate service of same upon defendant (.1).
11/29/20	K. Gradney	0.6	117.00	Review adversary dockets and reconcile deadlines to internal calendar.
11/30/20	V. Anaya	0.4	234.00	Draft extension stipulations for Principal and Equity Bastrop (0.3); Correspond with counsel to McGinnis regarding amended scheduling order (0.1).
11/30/20	V. Anaya	3.1	1,813.50	Review defense analysis provided by Enterprise (0.7); Review analysis for Bio-Rad, Simply Direct, Siemens, Advanced Analytical, and Medtronic (1.6); Review Zimmer revisions to settlement (0.3); Correspond with Trustee regarding recommended courses of action with respect to certain preference actions (0.5).
11/30/20	D. Mondragon	2.6	1,131.00	Draft responses to request for production; requests for admission and interrogatories re: Studensky v. Enterprise Fleet Management, Inc. and Enterprise FM Trust
11/30/20	K. Gradney	0.2	39.00	Finalize and prepare for filing stipulations extending answer deadline for defendants Equity Bastrop, Principal Life, Microport, and REVMD.
Total Avoidance Action Analysis		83.0	\$ 46,160.00	

Reference No.:

Invoice No: 1793775

156819-00001-JFW1

Page 6

Invoice Date: 09/03/21

Total Fees

\$46,452.50

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
N. Smithson	0.80	815.00	\$ 652.00
Total Partner	0.80		\$ 652.00
Associate:			
V. Anaya	74.00	585.00	\$ 43,290.00
D. Mondragon	2.60	435.00	\$ 1,131.00
Total Associate	76.60		\$ 44,421.00
Legal Assistants:			
K. Gradney	6.60	195.00	\$ 1,287.00
Total Legal Assistants	6.60		\$ 1,287.00
Case Clerks:			
D. Trevino	0.50	185.00	\$ 92.50
Total Case Clerks	0.50		\$ 92.50
TOTAL	84.50		\$ 46,452.50

Expenses:

Copying Expense	6.00
Delivery Fees	15.81
Postage	2.00
Research Services	16.30
SOS Direct On Line Filing Services	5.00

Total Expenses

45.11

TOTAL DUE THIS INVOICE:

\$46,497.61



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00001-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1793777
Invoice Date: 09/03/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Preference Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending December 31, 2020:

INVOICE SUMMARY

Total Fees	\$33,367.50
Total Expenses	68.06
Total Due This Invoice:	\$33,435.56

Reference No.:

Invoice No: 1793777

156819-00001-JFW1

Page 2

Invoice Date: 09/03/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Fee/Employment Applications:</u>				
12/01/20	V. Anaya	1.5	877.50	Review and revise first interim fee application.
12/02/20	V. Anaya	0.6	351.00	Review and revise fee application.
12/03/20	K. Gradney	0.5	97.50	Finalize Jackson Walker interim fee application (.3); prepare same for filing and coordinate service (.2).
Total Fee/Employment Applications		2.6	\$ 1,326.00	
<u>Avoidance Action Analysis:</u>				
12/01/20	V. Anaya	2.0	1,170.00	Prepare extension for Cortex (0.1); Correspond with counsel to same regarding defense information (0.1); Review upcoming dates and deadlines and outstanding issues (0.3); Revise McGinnis Scheduling Order and correspond with Court regarding same (0.5); Draft stipulation of dismissal based on defenses for Enterprise (0.4); Draft Bio-Rad settlement agreement (0.6).
12/02/20	V. Anaya	2.9	1,696.50	Prepare stipulation with Group & Pension (0.1); Prepare dismissal of Enterprise Adversary proceeding (0.3); Coordinate continuance of dates and deadlines for McGinnis adversary (0.2); Review reply filed by W. Kloppe (0.2); Review and revise Zimmer settlement agreement (1.1); Review defenses to Bhatt., Cox, Wright, and JWC rentals (1.0).
12/03/20	V. Anaya	1.2	702.00	Provide extensions to Texas Urologic and Infusion (0.2); Correspond with Hammes regarding settlement (0.1); Review outstanding issues related to each adversary proceeding (0.6); Correspond with counsel to Wright defendant (0.1); Review and revise Zimmer settlement agreement (0.2).
12/04/20	V. Anaya	0.9	526.50	Review information related to Intrinsiq and potential defenses (0.6); Review settlement offer provided by Besse (0.3).
12/04/20	V. Anaya	0.9	526.50	Draft confidentiality agreement for Group and Pension to determine defenses.
12/07/20	V. Anaya	2.1	1,228.50	Correspond with counsel to Zimmer regarding payment of settlement (0.1); Correspond with counsel to Hammes regarding same (0.1); Review preference defenses based on information provided by Troy for Cox, Wright, Bhatt., and JWC (1.9).

Reference No.:

Invoice No: 1793777

156819-00001-JFW1

Page 3

Invoice Date: 09/03/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
12/08/20	V. Anaya	4.3	2,515.50	Prepare rule 26 disclosures for Modular Space (0.2); Prepare same for Altaworx (0.2); Correspond with Trustee regarding receipt of settlement checks and confidentiality agreement (0.3); Review defenses provided by MedOne (0.6); Prepare discovery responses for Bhatt, Cox, and Wright (3.0).
12/09/20	V. Anaya	0.5	292.50	Finalize Cox, Wright, and Bhatt discovery responses and serve.
12/09/20	D. Mondragon	3.6	1,566.00	Research and analyze whether preference liability may be "setoff" with a postpetition claim, and/or whether a setoff may qualify as a defense under section 550.
12/09/20	D. Mondragon	0.1	43.50	Prepare outline on Motion to Dismiss in Advanced Analytical adversary for the purpose of hearing preparation and send to V. Anaya.
12/10/20	V. Anaya	1.8	1,053.00	Coordinate review of authorities regarding setoff issues related to certain preference defenses (0.2); Review preference action against Georgetown pulmonary and call with counsel to same (0.5); Review defenses provided by Updax (0.6); Review defenses provided by Chudleigh (0.5).
12/11/20	V. Anaya	6.4	3,744.00	Review defense information provided by Modular Space (0.4); Review same regarding Siemens (0.3); Review same regarding Texas Mutual (0.5); Review defenses for Dr. House, Georgetown Pulmonary, Med One, and Chudleigh (2.7); Review same for Equity Bastrop (0.2); Review same for Microport, Hologic, and Engage (0.9); Review same for Rev MD (0.4); Draft email to Trustee regarding analysis of all (1.0).
12/13/20	K. Gradney	0.6	117.00	Review scheduling order for Penmesta and update docket for deadlines.
12/14/20	V. Anaya	7.5	4,387.50	Review case law regarding 1409(b) issues (1.3); Prepare for hearing on motion to dismiss (5.0); Review case law regarding personal jurisdiction issues (1.2).
12/14/20	V. Anaya	0.2	117.00	Coordinate updating answer deadline with Court for certain adversary proceedings.
12/14/20	V. Anaya	6.0	3,510.00	Prepare for hearing on Motion to dismiss (5.5); Attend and argue hearing on Motion to dismiss (0.5).
12/15/20	V. Anaya	1.4	819.00	Prepare Rule 26 disclosures for Hing, Samesta, and Quest (0.3); Correspond with Amerisource regarding stipulation of dismissal (0.2); Review defenses for Hologic, Engage and Microport (0.3); Review settlement offer from Dahill and correspond with Trustee regarding same (0.6).

Reference No.:

Invoice No: 1793777

156819-00001-JFW1

Page 4

Invoice Date: 09/03/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
12/16/20	V. Anaya	4.9	2,866.50	Draft Dahill settlement agreement (0.3); review defenses for Genzyme, Straker, Praxair, Medtronic (1.0); Continue review of Praxair and Agilent (0.5); Call with counsel to Chudleigh (0.2); Call with J. Wertz regarding outstanding issues (0.5); Review authorities regarding recent issues with ordinary course (0.7); Review authorities regarding setoff of postpetition invoices for preference actions (1.7).
12/16/20	K. Gradney	0.9	175.50	Review adversary dockets for updated deadlines and reconcile internal calendar (.7); prepare for filing statements regarding consent in adversary cases Penmetsa, Hing-Sheung and Quest NS (.2).
12/17/20	V. Anaya	0.6	351.00	Review information provided regarding Genzyme and Praxair.
12/21/20	V. Anaya	2.6	1,521.00	Call with counsel to Cox, Bhatt, Wright, and JWC regarding continuance (0.2); Correspond with counsel to Stryker regarding defenses (0.1); Review and revise Settlement Agreement with Dahill and send to opposing counsel (0.3); Draft Motion to Dismiss Modular Space Corporation and correspond with opposing counsel regarding same (0.2); Draft discovery and serve on Georgetown OB-GYN (0.2); Draft discovery and serve on counsel for Beckman (0.2); Draft settlement agreement with Siemens (0.4); Correspond with counsel for Georgetown Pulmonary regarding settlement (0.2); Correspond with counsel for Med One regarding settlement (0.6); Draft Continuance Motions for Cox, Bhatt, Wright, and JWC (0.2).
12/22/20	V. Anaya	1.4	819.00	Prepare amended complaint regarding ARHC defendant (0.3); Call with counsel for Massergy regarding defenses (0.2); Call with counsel to McGinnis regarding discovery (0.2); Prepare discovery requests related to Dr. House (0.2); Prepare discovery requests related to Agilent (0.2); Draft settlement agreement for Simply Direct (0.3).
12/22/20	V. Anaya	0.2	117.00	Call with counsel to Medtronic regarding settlement offer.
12/22/20	T. Seals	0.3	120.00	Revise Further Stipulations Extending Answer Date for Stryker Sales instruments and Stryker & Howmedica.
12/22/20	K. Gradney	0.4	78.00	Prepare for filing amended complaint against American Realty (.2); coordinate alias summons and service upon defendants (.2).

Reference No.:

Invoice No: 1793777

156819-00001-JFW1

Page 5

Invoice Date: 09/03/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
12/23/20	V. Anaya	1.4	819.00	Call with A. Patillo regarding Cox, Bhatt, Wright, and JWC Rentals cases (0.2); Call with J. Traurig regarding Medtronic settlement offer (0.2); Draft simply direct settlement agreement (0.4); Update status chart regarding outstanding issues related to each adversary proceeding (0.6);
12/23/20	T. Seals	0.7	280.00	Little River tracker: review docket for each adversary proceeding and update answer deadline, any court order, statement of consent, motion for default judgment, and stipulation of dismissal.
12/23/20	T. Seals	0.2	80.00	Finalize stipulation send to K.Gradney for filing.
12/29/20	V. Anaya	0.9	526.50	Call with counsel for Fujifilm regarding potential defenses (0.3); Draft settlement agreement with Medtronic (0.4); Correspond with Trustee regarding Kloppe request about leave for appeal (0.2).
12/29/20	V. Anaya	0.1	58.50	Review executed settlement agreement from Simply Direct and correspond with counsel regarding settlement funds.
12/29/20	K. Gradney	0.5	97.50	Review and update internal docket with recently entered scheduling order for LTC (.3); draft and prepare for filing statement regarding consent in LTC adversary (.2).
12/30/20	V. Anaya	0.2	117.00	Prepare discovery requests and serve same on Central Texas Pathology.
Total Avoidance Action Analysis		57.7	\$ 32,041.50	

Total Fees \$33,367.50

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Associate:			
V. Anaya	52.50	585.00	\$ 30,712.50
D. Mondragon	3.70	435.00	\$ 1,609.50
T. Seals	1.20	400.00	\$ 480.00
Total Associate	57.40		\$ 32,802.00
Legal Assistants:			
K. Gradney	2.90	195.00	\$ 565.50
Total Legal Assistants	2.90		\$ 565.50
TOTAL	60.30		\$ 33,367.50

Reference No.:

Invoice No: 1793777

156819-00001-JFW1

Page 6

Invoice Date: 09/03/21

Expenses:

Color Imaging Expense	3.40
Copying Expense	17.40
Delivery Fees	24.66
Postage	2.60
Research Services	20.00

Total Expenses	<u>68.06</u>
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TOTAL DUE THIS INVOICE:	<u>\$33,435.56</u>
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Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00001-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1793780
Invoice Date: 09/03/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Preference Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending January 31, 2021:

INVOICE SUMMARY

Total Fees	\$26,979.00
Total Expenses	28.08
Total Due This Invoice:	\$27,007.08

Reference No.:

Invoice No: 1793780

156819-00001-JFW1

Page 2

Invoice Date: 09/03/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
01/04/21	V. Anaya	3.4	1,989.00	Call with A. Patillo regarding Bhatt, Cox, Wright, and JWC Rentals cases (0.1); Correspond with J. Studensky regarding analyses of Hologic, Fujifilm, Stryker, Microport, Genzyme, and Engage adversaries (1.1); Review defenses for Beckman Coulter (1.5); Review defenses provided by Santhi defendant and correspond with J. Studensky regarding same (0.7).
01/05/21	V. Anaya	1.4	819.00	Correspond with counsel to Intrinsiq (0.3); Review Intrinsiq defenses (0.5); Review defenses related to Richards Hospital (0.3); Call with counsel to Genzyme (0.1); Call with counsel to Dr. House (0.1); Call with counsel to Chudleigh (0.1).
01/06/21	V. Anaya	2.2	1,287.00	Review information related to Equity Bastrop defenses (0.3); Respond to counsel for bio-rad regarding settlement agreement (0.2); Review information from Chudleigh and draft recommendation to Trustee (0.3); Review defenses related to Cortex and email Troy regarding questions on certain transactions related to same (0.5); Review issues related to Texas Mutual (0.3); Review authorities regarding premium payment avoidance (0.5); Correspond with Santhi defendant regarding settlement offer (0.1).
01/06/21	K. Gradney	0.5	97.50	Prepare for filing motion for amended agreed scheduling order for JWC Rentals, Bhatt, Cox, and Wright adversaries.
01/06/21	K. Gradney	0.2	39.00	Upload revised proposed orders for motions for amended agreed scheduling order for Bhatt, JWC Rentals, Cox, and Wright adversaries.
01/08/21	V. Anaya	1.8	1,053.00	Provide email update to J. Studensky regarding various settlement issues, including, Zimmer, Hammes, Arthrex, Bio-Rad, Medtronic, Siemens, Hologic, Fujifilm, Styker, Microport, Genzyme, Engage, Intrinsiq, Chudleigh, Richards Hospital, Cortex (1.1); Finalize Stipulation of Dismissal for Arthrex (0.1); Revise Bio-Rad Settlement Agreement (0.1); Draft Siemens settlement agreement (0.2); Draft Medtronic settlement agreement (0.2); Finalize stipulation of dismissal for Hammes (0.1).
01/08/21	D. Mondragon	3.5	1,522.50	Determine through research and analysis of the documents sent by V. Anaya a to whether the claims set forth by Equity Bastrop constitute a preference.

Reference No.:

Invoice No: 1793780

156819-00001-JFW1

Page 3

Invoice Date: 09/03/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
01/11/21	V. Anaya	3.6	2,106.00	Prepare stipulation of dismissal for Stryker Howmedica (0.2); Prepare settlement offer regarding stryker case (0.3); Coorespond with Masergy regarding defense information (0.2); Correspond with Fujifilm regarding settlement information (0.1); Coorespond with Siemens regarding settlement payment issues (0.3); Review Cortex defenses and provide settlement (0.5); Coorespond with counsel to Intrinsiq regarding settlement offer (0.2); Prepare Microport stipulation of dismissal (0.2); Prepare same for Richards Hospital (0.2); Prepare settlement agreement with Genzyme (0.5); Address additional issues with Siemens settlement agreement (0.2); Review information regarding Wright Medical and defenses (0.4); Prepare motion to dismiss GDL (0.2); Correspond with counsel to Hologic regarding settlement offer (0.1).
01/12/21	V. Anaya	4.3	2,515.50	Call with counsel to Greenway (0.1); Review defenses related to Central Texas Oncology (0.5); Review defenses provided by Masergy (0.5); Review defenses related to Equity Bastrop (0.3); Correspond with counsel to Dr. House regarding scheduling order (0.1); Prepare recommendation for Trustee regarding analysis of all (0.4); Draft settlement agreement for Engage Healthcare (0.2); Review issues related to Chudleigh preference action (0.3); Call with counsel to Group and Pension (0.2); Call with Greenway counsel (0.2); Review authorities regarding avoidance of certain payments related to different insurance (1.5).
01/12/21	K. Gradney	6.4	1,248.00	Prepare for filing various stipulations extending answer deadline for defendants (.8); review recently entered scheduling orders for various proceedings and update internal docket with relative deadlines (.8); review all live adversary dockets for upcoming dates and deadlines and update internal calendar with same (4.2); update tracking chart with relative deadlines (.6).
01/13/21	V. Anaya	1.8	1,053.00	Finalize Microport stipulation of dismissal and prepare for filing (0.1); Draft settlement agreements for Hologic, Chudleigh, Fujifilm, Stryker, and revise Bio-Rad (1.1); Coorespond with Trustee regarding updates on Intrinsiq, Georgetown Pulmonary, Sparks, Pharmerica, Engage, Genzyme, Beckman (0.6).
01/13/21	K. Gradney	0.3	58.50	Prepare for filing stipulation of dismissal of Microport (.1); review and prepare for filing agreed motion for amended agreed scheduling order for Janelle House (.2).

Reference No.:

Invoice No: 1793780

156819-00001-JFW1

Page 4

Invoice Date: 09/03/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
01/14/21	V. Anaya	3.5	2,047.50	Review 3M defenses (0.5); Email Troy regarding information requests (0.2); Call with Central Texas Oncology regarding settlement offer (0.2); Review Agilent defenses (0.3); Review Wright Defenses (0.3); Call with J. Wertz regarding outstanding matters (0.3); Draft settlement agreement related to Agilent (0.3); Draft email to Trustee regarding settlement offers (0.6); Review final Medtronic settlement agreement (0.1); Review Siemens revisions to settlement agreement (0.1); Correspond with counsel to Georgetown regarding defenses (0.1); Email to Sparks regarding defenses (0.2); Revise settlement agreement related to Engage (0.3).
01/15/21	V. Anaya	0.8	468.00	Draft extensions for 3M, MedOne, Texas Mutual, Group and Pension, Hologic and Metlife to finalize settlement negotiations (0.8).
01/15/21	K. Gradney	0.3	58.50	Prepare for filing stipulations extending answer deadline for defendants in various pending adversary proceedings.
01/17/21	K. Gradney	0.9	175.50	Review recently entered amended agreed scheduling orders for Janelle House and Masergy and update internal docket with deadlines (.6); review dockets for other pending adversaries and update internal docket with revised answer deadlines (.3).
01/19/21	V. Anaya	3.2	1,872.00	Update Trustee regarding Georgetown Pulmonary, Genzyme, Cortex, Equity Bastrop, Medone, Stryker, Intrinsiq, Sparks (1.1); Draft extensions for Texas Mutual, Intrinsiq, and Beckman Coulter to enable finalizing settlement discussions (0.3); Review Kloppe issues related to adversary (1.6); Call with counsel for Tex Elect regarding defenses (0.2).
01/19/21	K. Gradney	0.6	117.00	Prepare for filing multiple stipulations in various adversary cases extending time for defendants to answer complaint.
01/20/21	V. Anaya	2.5	1,462.50	Correspond with counsel to Fujifilm regarding settlement payment (0.1); Draft stipulations with Abbvie and Wright Medical to provide time to finalize settlement discussions (0.1); Correspond with Trustee regarding W. Kloppe lawsuit (0.2); Analyze defenses provided by Hing Sheung (0.3); Correspond with Trustee regarding same and Tex-Elect settlement offers (0.4); Review information provided by Advanced Analytical and correspond with Trustee regarding same (1.0); Call with counsel to Georgetown OB-GYN regarding settlement offer (0.2); Review defenses related to same (0.2).
01/21/21	V. Anaya	0.3	175.50	Review issues related to Advanced Analytical answer and appeal.

Reference No.:

Invoice No: 1793780

156819-00001-JFW1

Page 5

Invoice Date: 09/03/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
01/21/21	V. Anaya	0.2	117.00	Correspond with Ohio regarding stipulation.
01/22/21	N. Smithson	0.6	489.00	Analysis with respect to proper distributions to Members to cover allocated net income.
01/22/21	V. Anaya	2.3	1,345.50	Call with counsel for Dr. Hing regarding settlement offer (0.1); Review Georgetown-Ob GYN Offer (1.5); Update status chart to reflect status of all adversary proceedings (0.5); Draft discovery for Altaworx (0.2).
01/25/21	V. Anaya	0.9	526.50	Review Fujifilm settlement agreement (0.2); Review Agilent and Stryker Settlement Agreements (0.4); Updated to Trustee regarding Central Texas Oncology and Fujifilm (0.3).
01/26/21	V. Anaya	4.2	2,457.00	Review Agilent Settlement Agreement and file stipulation (0.2); Revise settlement agreements for Central Texas Oncology, Fujifilm, and Genzyme (0.5); Draft Settlement Agreement with Georgetown Pulmonary (0.4); Draft Settlement Agreements for Fung, Intrinsiq (0.6); Follow up with counsel for Masergy regarding settlement (0.1); Follow up with counsel for Santhi regarding settlement (0.1); Draft Tex Elect Settlement (0.3); Draft settlement agreement for Equity Bastrop (0.6); Update status chart regarding Stericylce, Greenway, Janelle House and others (0.6); Revise settlement agreement related to Hologic (0.5); Draft Central Texas Oncology Stipulation (0.3).
01/26/21	V. Anaya	0.1	58.50	Correspond with counsel for Tex-Elect regarding settlement offer.
01/26/21	S. Harris	0.9	553.50	Analyze and summarize non-profit health organization healthcare regulatory requirements in connection with Little River matter.
01/27/21	V. Anaya	0.9	526.50	Correspond with Intrinsiq regarding final settlement agreement (0.2); Call with counsel for community trust regarding settlement (0.2); Draft stipulation extending answer deadline for same (0.1); Review and revise Equity Bastrop Settlement (0.4).
01/28/21	V. Anaya	1.0	585.00	File stipulation of dismissal for Zimmer (0.1); Begin drafting motions for default judgment (0.5); Update status chart for all adversaries (0.4).
01/28/21	K. Gradney	0.6	117.00	Review and update internal docket with newly entered scheduling order for Agilent (.3); update answer deadlines for various defendants (.3).
01/29/21	K. Gradney	0.2	39.00	Prepare for filing stipulation of dismissal of Zimmer adversary (.1); coordinate filing of stipulation extending answer date (.1).
Total Avoidance Action Analysis		53.4	\$ 26,979.00	

Reference No.:

Invoice No: 1793780

156819-00001-JFW1

Page 6

Invoice Date: 09/03/21

Total Fees

\$26,979.00

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
N. Smithson	0.60	815.00	\$ 489.00
Total Partner	0.60		\$ 489.00
Associate:			
V. Anaya	38.40	585.00	\$ 22,464.00
S. Harris	0.90	615.00	\$ 553.50
D. Mondragon	3.50	435.00	\$ 1,522.50
Total Associate	42.80		\$ 24,540.00
Legal Assistants:			
K. Gradney	10.00	195.00	\$ 1,950.00
Total Legal Assistants	10.00		\$ 1,950.00
TOTAL	<u>53.40</u>		<u>\$ 26,979.00</u>

Expenses:

Copying Expense	7.60
Delivery Fees	10.68
Postage	8.80
SOS Direct On Line Filing Services	1.00

Total Expenses

28.08

TOTAL DUE THIS INVOICE:

\$27,007.08



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

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Ref No.: 156819-00001-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1793781
Invoice Date: 09/07/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Preference Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending February 28, 2021:

INVOICE SUMMARY

Total Fees	\$20,150.50
Total Expenses	146.53
Total Due This Invoice:	\$20,297.03

Reference No.:

Invoice No: 1793781

156819-00001-JFW1

Page 2

Invoice Date: 09/07/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
02/01/21	V. Anaya	1.2	702.00	Provide final settlement agreement to Tex-Elect (0.1); Provide final settlement agreement to Chudleigh (0.1); Review and revise Equity Bastrop settlement agreement (0.5); Call with D. Alford regarding two adversary proceedings (0.2); Draft stipulation regarding Central Texas Pathology (0.1); Email to Stericycle about motion for default judgment (0.1); Email to P. Thompson regarding same (0.1).
02/01/21	K. Gradney	0.1	19.50	Prepare for filing stipulation of dismissal for Central Texas Oncology.
02/02/21	V. Anaya	2.8	1,638.00	Received Siemens settlement check and correspond with counsel regarding same (0.1); Review and revise Motion for Default Judgments against Specialty Pharmacy, Stericycle, A&A, and Ecomed (1.5); Draft Motion for Default Judgment against Thompson (0.9); Correspond with Trustee regarding Motions for Default Judgment (0.3).
02/02/21	C. Luckie	0.2	62.00	Investigate the date of birth of Peyton Thompson, MD.
02/03/21	V. Anaya	4.4	2,574.00	Draft discovery for William Kloppe (1.5); Draft discovery related to William Kloppe (2.1); Correspond with counsel to Hologic regarding settlement (0.1); Finalize motions for default judgment for various adversary proceedings and prepare for filing (0.7).
02/04/21	V. Anaya	0.7	409.50	Review and revise Peyton Motion for default judgment and prepare for filing.
02/05/21	N. Smithson	0.7	570.50	Review and comment to memorandum regarding tax distributions.
02/05/21	V. Anaya	1.9	1,111.50	Finalize Kloppe and Advanced Analytical and prepare for service (1.5); Prepare rule 26 disclosure and send to same (0.4).
02/09/21	V. Anaya	0.9	526.50	Correspond with Trustee regarding outstanding settlement checks (0.3); Correspond with Court regarding certain adversary proceedings and update on same (0.2); Draft motion for default judgment against Georgetown Ortho (0.4).
02/09/21	D. Mondragon	3.0	1,305.00	Review brief prepared by Advanced Analytical Services, including all documents which pertain to the same, for the purpose of creating outline in preparation of response to the same; conduct research specifically as to elements of constructive fraudulent transfers 548(b), specifically as to "reasonably equivalent value."

Reference No.:

Invoice No: 1793781

156819-00001-JFW1

Page 3

Invoice Date: 09/07/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
02/09/21	D. Mondragon	2.1	913.50	Begin drafting response to Advance Analytical's motion to dismiss (appeal to the district court), with focus on constructive fraudulent transfers 548(b).
02/11/21	D. Mondragon	2.0	870.00	Begin drafting response to Advance Analytical's motion to dismiss (appeal to the district court), with focus on constructive fraudulent transfers 548(b).
02/12/21	K. Gradney	0.4	78.00	Coordinate service of discovery upon several adversary defendants.
02/16/21	D. Mondragon	0.5	217.50	Begin drafting facts section of response to motion to dismiss.
02/17/21	D. Mondragon	0.6	261.00	Structure several compiled citations regarding the waiver of claim issue on appeal.
02/19/21	D. Mondragon	0.9	391.50	Continue arranging applicable citations and cases for waiver issue.
02/23/21	V. Anaya	3.6	2,106.00	Review Abbvie defenses to preference action (0.3); Review Santhi response and additional defenses (0.3); Review information and defenses provided by Greenway (1.3); Correspond with Trustee regarding checks received, Pharmerica, Abbvie, and Georgetown, and Stryker settlement offers (0.6); Review Stryker Endoscopy defenses (0.1); Begin review of McGinnis defenses (0.2); Draft MedOne settlement agreement (0.3); Correspond with counsel to Siemens, Central Texas Oncology, Hologic, Tex Elect, and Dahill regarding stipulations of dismissal (0.3); Correspond with counsel for Abbvie regarding settlement offer (0.2).
02/23/21	V. Anaya	3.1	1,813.50	Begin drafting Response to Motion to Stay filed in District Court appeal of William Kloppe and Advanced Analytical.
02/23/21	D. Mondragon	5.7	2,479.50	Draft response brief.
02/23/21	D. Trevino	0.3	55.50	Review and prepare for filing Stipulations of Dismissal for Hologic, Central Texas Oncology, Dahill and Tex Elect.
02/24/21	V. Anaya	2.1	1,228.50	Continue drafting Response to Motion to Stay filed in District Court appeal of William Kloppe and Advanced Analytical.
02/24/21	D. Mondragon	0.4	174.00	Finalize footnotes and titles in response brief.
02/25/21	V. Anaya	0.1	58.50	Finalize response to Motion to Stay and serve S. Casey with same (Kloppe).
02/25/21	K. Gradney	0.2	39.00	Prepare for filing response to Kloppe motion to stay proceeding.

Reference No.:

Invoice No: 1793781

156819-00001-JFW1

Page 4

Invoice Date: 09/07/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
02/26/21	V. Anaya	0.8	468.00	Correspond with counsel to Stryker Endoscopy regarding settlement (0.1); Correspond with Greenway regarding information on defenses (0.1); Correspond with Beckman Coulter regarding defenses (0.2); Draft Stryker settlement agreement (0.4).
02/26/21	K. Gradney	0.1	19.50	Prepare for filing stipulation extending time for Defendant Stryker to answer complaint.
02/27/21	K. Gradney	0.3	58.50	Prepare for filing motion for default judgment against Georgetown Ortho.
Total Avoidance Action Analysis		39.1	\$ 20,150.50	

Total Fees

\$20,150.50

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
N. Smithson	0.70	815.00	\$ 570.50
Total Partner	0.70		\$ 570.50
Associate:			
V. Anaya	21.60	585.00	\$ 12,636.00
D. Mondragon	15.20	435.00	\$ 6,612.00
Total Associate	36.80		\$ 19,248.00
Staff Attorneys:			
C. Luckie	0.20	310.00	\$ 62.00
Total Staff Attorneys	0.20		\$ 62.00
Legal Assistants:			
K. Gradney	1.10	195.00	\$ 214.50
Total Legal Assistants	1.10		\$ 214.50
Case Clerks:			
D. Trevino	0.30	185.00	\$ 55.50
Total Case Clerks	0.30		\$ 55.50
TOTAL	39.10		\$ 20,150.50

Expenses:

Color Imaging Expense	0.85
Copying Expense	11.00

Reference No.:

Invoice No: 1793781

156819-00001-JFW1

Page 5

Invoice Date: 09/07/21

Delivery Fees	58.32
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Postage	27.20
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Research Services	43.16
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SOS Direct On Line Filing Services	6.00
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Total Expenses

146.53

TOTAL DUE THIS INVOICE:

\$20,297.03



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
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Ref No.: 156819-00001-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1793782
Invoice Date: 09/07/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Preference Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending March 31, 2021:

INVOICE SUMMARY

Total Fees	\$43,168.50
Total Expenses	44.60
Total Due This Invoice:	\$43,213.10

Reference No.:

Invoice No: 1793782

156819-00001-JFW1

Page 2

Invoice Date: 09/07/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
03/01/21	V. Anaya	4.2	2,457.00	Continue drafting and revising appellate brief related to Kloppe.
03/01/21	D. Mondragon	0.9	391.50	Find case law, if any, providing for dismissal of a case pursuant to Rule 8009 where appellant has failed to designate a record on appeal, and add case law to separate document for V. Anaya's inclusion of the argument in the Response Brief.
03/01/21	D. Mondragon	2.2	957.00	Draft argument with asserting that Trustee has meet its pleading requirements as to its fraudulent transfer claims.
03/02/21	V. Anaya	6.7	3,919.50	Continue reviewing and revising Kloppe Appellate brief (6.7).
03/02/21	V. Anaya	0.4	234.00	Call with counsel for Santhi regarding settlement discussions (0.3); Call with A. Patillo regarding discovery (0.1).
03/03/21	V. Anaya	5.3	3,100.50	Draft and revise brief of appellee.
03/03/21	V. Anaya	0.2	117.00	Correspond with court clerk regarding status of different matters.
03/03/21	V. Anaya	4.0	2,340.00	Review defenses provided by Beckman Coulter.
03/03/21	D. Mondragon	7.3	3,175.50	Continue revision of footnotes incorporated by V. Anaya as well as the brief as a whole, while condensing the currently 30-page document, and drafting the appropriate question to be answered on appeal.
03/04/21	V. Anaya	1.8	1,053.00	Finalize appellate brief and prepare for filing.

Reference No.:

Invoice No: 1793782

156819-00001-JFW1

Page 3

Invoice Date: 09/07/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
03/09/21	V. Anaya	6.2	3,627.00	Review defenses provided by Greenway, Genzyme, Regus, and Abbvie (1.0); Review defenses provided by McGinnis (0.6); Draft email to Trustee regarding Greenway, Regus, Genzyme, Abbvie settlement recommendations (1.1); Correspond with Trustee regarding counter-offer provided by Santhi (0.2); Review defenses provided by Central Texas Pathology (0.7); Update status chart regarding all adversary proceedings (0.3); Correspond with Intrinsiq regarding settlement payment (0.1); Correspond with Dr. Fung regarding settlement payment (0.1); Call with Counsel to Central Texas Oncology regarding defenses (0.2); Correspond with counsel to McGinnis regarding settlement offer (0.2); Correspond with counsel to Santhi regarding counter offer (0.1); Review defenses provided by Dr. Cox (0.3); Correspond with counsel to Greenway, Regus, Abbvie, Georgetown Pulmonary, and Genzyme regarding settlement offers (0.3); Review Bhatt preference defenses (0.3); Review House preference defenses (0.2); Review Wright preference defenses (0.3); Correspond with counsel to House, Bhatt, Cox, and Wright regarding additional information necessary to evaluate defenses (0.2).
03/10/21	V. Anaya	8.1	4,738.50	Correspond with Trustee regarding deposited settlement checks (0.3); Review Wright medical defenses (2.1); Review 3M defenses (1.0); Review Pharmerica defenses and prepare for call (1.2); Call with counsel to Pharmerica regarding settlement discussions (0.2); Draft email to Pharmerica regarding settlement proposal (0.5); Correspond with Court regarding amended scheduling order for Beckman Coulter and Georgetown Ob-GYN (0.4); Review defenses by Leica (1.8); Update status chart (0.4); Correspond with Regus regarding settlement offer (0.1); Prepare stipulation of dismissal for Fujifilm and file (0.1).
03/10/21	K. Gradney	0.2	39.00	Prepare for fling stipulations dismissing adversary for Siemens and Fujifilm.
03/10/21	K. Gradney	0.2	39.00	Coordinate settlement check to the Trustee for Hing-Sheung Eugene Fung MD.
03/11/21	V. Anaya	3.0	1,755.00	Draft extension stipulation requested by Court for Healthcare Trust (0.1); Draft agreed scheduling order for Beckman Coulter (0.5); Draft McGinnis settlement agreement (0.5); Draft Regus settlement agreement (1.1); Draft Georgetown settlement agreement (0.3); Draft agreed scheduling order for Georgetown OBGYN (0.2); Call with Leica regarding defenses (0.2); Correspond with Trustee regarding same (0.1).

Reference No.:

Invoice No: 1793782

156819-00001-JFW1

Page 4

Invoice Date: 09/07/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
03/12/21	V. Anaya	2.3	1,345.50	Call with J. Wertz regarding upcoming dates and deadlines (0.3); Coordinate reset docket calls with chambers for Beckman Coulter and Georgetown OBGYN (0.2); Draft Leica settlement agreement (0.5); Correspond with Wright Medical regarding settlement offer (0.4); Correspond with 3M regarding settlement offer (0.5); Finalize McGinnis settlement agreement and provide execution version (0.3); Update chart of outstanding issues related to all adversary proceedings (0.1).
03/15/21	V. Anaya	2.0	1,170.00	Review and revise Greenway settlement agreement (0.2); Revise Regus settlement agreement (0.4); Correspond with Trustee regarding same (0.2); Correspond with Georgetown OBGYN about extension of deadlines (0.1); Review RevMD defenses (1.0); Review issues related to Altus Biologics (0.1).
03/15/21	K. Gradney	0.3	58.50	Prepare for filing motion for agreed amended scheduling order in Georgetown OB-GYN docket (.2); prepare for filing stipulation extending answer deadline for Defendant UPDOX (.1).
03/16/21	V. Anaya	0.1	58.50	Correspond with counsel to Infusion regarding defenses.
03/16/21	V. Anaya	1.3	760.50	Correspond with counsel to Santhi regarding settlement offer (0.2); Correspond with RevMD regarding defenses and extension (0.2); Correspond with Central Texas Pathology regarding stip of dismissal (0.2); Correspond with Court regarding upcoming deadlines in face of McGinnis settlement (0.1); Draft settlement agreement with Santhi (0.3); Call with counsel to Santhi regarding same (0.1); Correspond with counsel to Regus regarding settlement agreement (0.1); Correspond with counsel to Central Texas Pathology regarding stipulation (0.1).
03/16/21	K. Gradney	0.2	39.00	Prepare for filing stipulations extending time for Defendants Greenway and Pharmerica to answer complaint (.1); prepare for filing stipulation of dismissal of Central Texas Pathology (.1).
03/18/21	V. Anaya	0.3	175.50	Call with Group & Pension defendant regarding defenses (0.2); Draft stipulation on answer deadline regarding met life (0.1).
03/18/21	K. Gradney	1.0	195.00	Update internal dates and deadlines and reconcile recently entered amended scheduling orders with calendar for upcoming deadlines.
03/19/21	V. Anaya	0.5	292.50	Correspond with counsel for RevMD regarding defenses (0.2); Review and revise MedOne settlement agreement (0.2); Review and revise Santhi settlement agreement (0.1).

Reference No.:

Invoice No: 1793782

156819-00001-JFW1

Page 5

Invoice Date: 09/07/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
03/22/21	V. Anaya	0.4	234.00	Correspond with Trustee regarding clearance of settlement checks (0.1); Prepare and file stipulations of dismissal based on terms of settlement agreement with Medtronic, Chudleigh, and Equity Bastrop (0.3).
03/22/21	V. Anaya	4.1	2,398.50	Review discovery provided by Kloppe (1.6); Prepare Second Amended Complaint in Kloppe matter (1.4); Draft Motion for Leave to file Amended Complaint (1.1).
03/22/21	K. Gradney	0.5	97.50	Prepare for filing stipulations dismissing adversary proceedings for LTC Support Services, Equity Bastrop, and Medtronic (.3); correspondence with V Anaya regarding same (.2).
03/22/21	K. Gradney	0.1	19.50	Upload order granting Trustee's motion for leave to amend complaint in Kloppe adversary proceeding.
03/23/21	V. Anaya	0.8	468.00	Prepare Bio-Rad stipulation of dismissal for filing based on terms of settlement (0.2); Attend hearing on McGinnis setting and report settlement to the Court (0.3); Update status chart regarding settled adversaries (0.3).
03/23/21	V. Anaya	0.1	58.50	Prepare second amended complaint related to Kloppe adversary for filing as instructed by Court order.
03/23/21	V. Anaya	0.3	175.50	Update status chart related to settlement negotiations in all adversaries.
03/23/21	K. Gradney	0.4	78.00	Review and prepare for filing second amended complaint against W. Kloppe (.2); review docket sheet of R Downton adversary for status of docket call setting (.1); communication with V Anaya regarding same (.1).
03/24/21	V. Anaya	0.4	234.00	Review fully executed settlement agreement from Santhi (0.1); Correspond with Stryker regarding settlement funds (0.1); Review issues related to Genzyme response (0.2).
03/25/21	V. Anaya	1.5	877.50	Coordinate remaining issues with J. Wertz regarding settlement of Genzyme action (0.1); Draft update email to Trustee regarding cashed checks and Leica and Regus issues (0.8); Review issues related to Texas Mutual adversary and defenses (0.6).
03/25/21	K. Gradney	0.5	97.50	Update docket with new answer dates in various adversaries.

Reference No.:

Invoice No: 1793782

156819-00001-JFW1

Page 6

Invoice Date: 09/07/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
03/26/21	V. Anaya	4.4	2,574.00	Review issues related to Group and Pension adversary proceeding (1.2); Call with Group and Pension regarding adversary (0.8); Correspond with Leica regarding extension to effectuate terms of settlement (0.1); Review issues related to Texas Mutual, Met Life, Principal and Group and Pension adversary proceedings (2.2); Correspond with A. Patillo regarding information provided (0.1).
03/26/21	K. Gradney	0.2	39.00	Prepare for filing stipulations extending answer deadlines for Leica and Group Pension advesaries.
03/29/21	V. Anaya	1.4	819.00	Finalize settlement agreement and stipulation of dismissal with Genzyme (0.3); Review additional information from 3M as part of defenses (1.0); Review correspondence from Altaworx (0.1).
03/29/21	D. Mondragon	2.5	1,087.50	Determine whether premium payments payable to an insurance company subject to avoidance under 11 U.S.C. § 547 (as well as two additional questions).
03/29/21	K. Gradney	0.1	19.50	Prepare for filing stipulation of dismissal in Genzyme adversary.
03/30/21	V. Anaya	0.9	526.50	Correspond with 3M about defenses (0.1); Correspond with Texas Mutual regarding defenses (0.3); Correspond with A. Patillo regarding defenses (0.1); Call with counsel to infusion regarding defenses (0.2); Draft extension stipulations for Texas Mutual, Infusion, 3M, Cortex, Community, given continued settlement discussions (0.2).
03/30/21	K. Gradney	0.2	39.00	Prepare for filing stipulations extending answer deadline for Texas Mutual and Infusion.
03/31/21	V. Anaya	2.2	1,287.00	Correspond with Trustee regarding updates to adversary proceedings (0.3); Review authorities regarding insurance preference issues (0.8); Correspond with Wright Medical regarding defenses (0.1); Correspond with Trustee about checks deposited (0.1); Prepare stipulation of dismissal for Hing Sheung adversary (0.2); Correspond with counsel to Regus regarding changes to settlement agreements (0.4); Correspond with Med One about status of settlement agreement (0.2); Correspond with Intrinsic regarding stipulation of dismissal (0.1).
Total Avoidance Action Analysis		79.7	\$ 43,168.50	

Total Fees

\$43,168.50

Reference No.:

Invoice No: 1793782

156819-00001-JFW1

Page 7

Invoice Date: 09/07/21

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Associate:			
V. Anaya	62.90	585.00	\$ 36,796.50
D. Mondragon	12.90	435.00	\$ 5,611.50
Total Associate	75.80		\$ 42,408.00
Legal Assistants:			
K. Gradney	3.90	195.00	\$ 760.50
Total Legal Assistants	3.90		\$ 760.50
TOTAL	<u>79.70</u>		<u>\$ 43,168.50</u>

Expenses:

Delivery Fees 43.00

Postage 1.60

Total Expenses 44.60

TOTAL DUE THIS INVOICE: **\$43,213.10**



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00001-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1793785
Invoice Date: 09/07/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Preference Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending April 30, 2021:

INVOICE SUMMARY

Total Fees	\$16,438.50
Total Expenses	10.80
Total Due This Invoice:	\$16,449.30

Reference No.:

Invoice No: 1793785

156819-00001-JFW1

Page 2

Invoice Date: 09/07/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
04/05/21	V. Anaya	2.4	1,404.00	Review authorities regarding Bhatt, Wright, Cox, and House defenses asserted to administrative claim issues (1.7); Correspond with Trustee regarding same issues (0.7).
04/05/21	K. Gradney	0.1	19.50	Prepare for filing stipulation of dismissal of Intrinsiq adversary.
04/06/21	V. Anaya	0.4	234.00	Correspond with court clerk regarding outstanding issues in adversary proceedings (0.4).
04/06/21	V. Anaya	3.3	1,930.50	Review Altaworx defenses (0.6); Review authorities related to antecedent debt issues (1.8); Correspond with Altaworx regarding settlement proposal (0.2); Call with counsel to Quest regarding defenses (0.1); Coordinate extension of scheduling order deadlines with Court related to Quest and Altaworx cases (0.2); Draft agreed scheduling order for same and prepare for filing (0.4).
04/06/21	K. Gradney	0.1	19.50	Prepare for filing stipulation of dismissal of Stryker Corporation.
04/07/21	V. Anaya	0.2	117.00	Prepare agreed motion for filing with Altaworx regarding scheduling order (0.1); Correspond with counsel for Stryker regarding settlement (0.1).
04/07/21	K. Gradney	0.8	156.00	Review multiple adversary dockets for dismissed parties, extended answer deadlines, and amended scheduling orders in order to reconcile internal docket to same.
04/07/21	K. Gradney	0.2	39.00	Review recently entered orders granting amended scheduling orders for Altaworx and Quest (.1); serve same upon opposing counsel (.1).
04/12/21	V. Anaya	1.7	994.50	Continue review avoidance defenses submitted by Bhatt, Wright, Cox, and House Defendants.
04/13/21	V. Anaya	1.4	819.00	Call with counsel for Wright, Bhatt, Cox, and House regarding settlement offer (0.2); Correspond with J. Studensky regarding recommendation on Wright, Bhatt, Cox, and House adversaries (0.8); Attend docket call for Santhi adversary proceeding (0.4).
04/19/21	V. Anaya	0.1	58.50	Correspond with Trustee regarding Altaworx settlement offer.
04/22/21	V. Anaya	0.6	351.00	Review Quest Diagnostics defenses.

Reference No.:

Invoice No: 1793785

156819-00001-JFW1

Page 3

Invoice Date: 09/07/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
04/23/21	V. Anaya	4.7	2,749.50	Review issues related to Central Texas Urologic and defenses available (0.5); Call with Kerry regarding Quest defenses (0.2); Correspond with Trustee regarding settlement proposal for Question (0.2); Review additional defense information provided by Masergy (0.8); Review and revise settlement agreement with Greenway (0.3); Review and revise Praxair settlement offer (0.2); Correspond with counsel to Leica regarding settlement agreement issues (0.1); Review defenses provided by Community Trust (2.0); Review defenses provided by American Realty (0.4).
04/26/21	V. Anaya	1.5	877.50	Correspond with A. Patillo regarding discovery in Bhatt, Wright, Cox, and House cases (0.1); Correspond with Trustee regarding stipulations of dismissal to file (0.2); Call with counsel to Pharmerica regarding resolution of adversary proceeding (0.6); Prepare stipulations of dismissal for Santhi, Georgetown Pulmonary, Stryker (0.4); Review revisions to Regus Corporation settlement agreement (0.2).
04/26/21	K. Gradney	0.4	78.00	Prepare for filing stipulation of dismissal for Pensmetsa and Georgetown Pulmonary (.2); review recently filed motion to dismiss by Kloppe and docket responsive date for same (.2).
04/27/21	V. Anaya	0.3	175.50	Correspond with counsel to Regus regarding settlement payment (0.1); Correspond with A. Patillo regarding settlement offers for Bhatt, Cox, and House (0.2).
04/27/21	D. Mondragon	1.9	826.50	Review response filed for the purpose of drafting reply as well as identifying applicable pleadings for the purpose of setting up the outline for the same.
04/27/21	K. Gradney	0.1	19.50	Prepare for filing stipulation of dismissal of adversary against Georgetown Pulmonary.
04/28/21	V. Anaya	2.0	1,170.00	Prepare for call with counsel to Masergy (0.6); Review settlement terms and prepare email to counsel for Pharmerica regarding same (0.9); Call with counsel for Masergy regarding settlement (0.2); Correspond with Trustee regarding settlement offer (0.3).
04/28/21	D. Mondragon	1.7	739.50	Begin drafting reply to response to motion to dismiss.
04/29/21	V. Anaya	1.2	702.00	Correspond with counsel to Pharmerica regarding settlement terms (0.2); Correspond with Trustee regarding claims register issues (0.1); Correspond with Masergy regarding settlement offer (0.1); Correspond with Quest regarding settlement offer (0.3); Draft Praxair settlement agreement (0.4); Draft settlement proposal to Community Healthcare Trust defendant (0.1).

Reference No.:

Invoice No: 1793785

156819-00001-JFW1

Page 4

Invoice Date: 09/07/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
04/29/21	D. Mondragon	2.8	1,218.00	Continue drafting response.
04/29/21	D. Mondragon	3.6	1,566.00	Continue drafting Response to Second Amended Motion to Dismiss; specifically crafting the background to reflect updated information in the Second Amended Complaint.
04/29/21	D. Mondragon	0.4	174.00	Research law of the case doctrine as applied to Defendant's Amended Motion.
Total Avoidance Action Analysis		31.9	\$ 16,438.50	

Total Fees \$16,438.50

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Associate:			
V. Anaya	19.80	585.00	\$ 11,583.00
D. Mondragon	10.40	435.00	\$ 4,524.00
Total Associate	30.20		\$ 16,107.00
Legal Assistants:			
K. Gradney	1.70	195.00	\$ 331.50
Total Legal Assistants	1.70		\$ 331.50
TOTAL	31.90		\$ 16,438.50

Expenses:

Delivery Fees 10.80

Total Expenses 10.80

TOTAL DUE THIS INVOICE: **\$16,449.30**



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00001-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1793787
Invoice Date: 09/10/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Preference Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending May 31, 2021:

INVOICE SUMMARY

Total Fees	\$46,778.50
Total Expenses	0.00
Total Due This Invoice:	\$46,778.50

Reference No.:

Invoice No: 1793787

156819-00001-JFW1

Page 2

Invoice Date: 09/10/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
05/03/21	V. Anaya	2.4	1,404.00	Draft Altaworx settlement agreement and send to opposing counsel for review (0.3); Review counteroffer provided by Masergy and communicate same with Trustee (0.1); Draft settlement agreement for Dr. Bhatt (0.4); Draft settlement agreement for Dr. Cox (0.4); Correspond with Trustee regarding same (0.1); Correspond with counsel to Greenway regarding revisions to settlement agreement (0.1); Review additional information to fully analyze Praxair defenses (0.2); Review and revise Leica settlement agreement (0.7); Correspond with counsel to Leica regarding same (0.1).
05/04/21	V. Anaya	8.3	4,855.50	Review information related to Kloppe adversary proceeding and document production (4.2); Review and revise response to Kloppe motion to dismiss (3.1); Correspond with counsel to Pharmerica regarding settlement (0.1); Correspond with counsel to Dr. Bhatt and Dr. Cox regarding settlement agreements (0.1); Draft Masergy settlement agreement (0.6); Review and revise Altaworx settlement agreement based on revisions provided by opposing counsel (0.2).
05/04/21	D. Trevino	0.2	37.00	Review and prepare for filing the Response to Defendants' Amended Second Motion to Dismiss (.1) Circulate to opposing counsel (.1).
05/05/21	V. Anaya	0.5	292.50	Draft House settlement agreement (0.5).
05/06/21	V. Anaya	1.2	702.00	Correspond with Wright regarding settlement offer (0.1); Correspond with counsel to Bhatt, House, and Cox regarding settlement agreements (0.3); Draft settlement agreement for Community Trust (0.5); Correspond with A. Patillo regarding Dr. Wright settlement offer (0.3).
05/07/21	V. Anaya	0.2	117.00	Review Bhatt and House fully executed settlement agreements and file stipulation of dismissal for same (0.2).
05/07/21	K. Gradney	0.1	19.50	Prepare stipulation of dismissal of adversary proceeding for Janelle House.
05/10/21	V. Anaya	0.8	468.00	Call with counsel to Greenway regarding revisions to settlement agreement (0.2); Review changes to Masergy settlement agreement (0.1); Review Kloppe motion to dismiss (0.5).

Reference No.:

Invoice No: 1793787

156819-00001-JFW1

Page 3

Invoice Date: 09/10/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/11/21	V. Anaya	2.8	1,638.00	Review revisions to Greenway settlement agreement and revise accordingly (0.5); Review JWC Rental issues and defenses and correspond with A. Patillo regarding same (1.6); Review issues related to Dr. Wright (0.2); Correspond with Kloppe regarding withdrawal of motion for summary judgment because it was based on improper admissions (0.2); Finalize Masergy settlement agreement (0.2); Prepare stipulation of dismissal for Cox adversary proceeding for filing (0.1).
05/11/21	K. Gradney	0.3	58.50	Prepare for filing stipulation of dismissal of Bhatt adversary proceeding (.1); update internal docket regarding dismissal and removal of pending deadlines (.1); prepare for filing stipulation of dismissal for Ronald Cox adversary proceeding (.1).
05/12/21	V. Anaya	0.3	175.50	Correspond with Court regarding Sparks adversary proceeding and MedOne (0.2); Correspond with D. Castleberry regarding Masergy hearing (0.1).
05/12/21	V. Anaya	7.6	4,446.00	Begin drafting Kloppe Motion to Strike Admissions (4.4); Begin drafting declarations in support of motion to strike (3.2).
05/13/21	V. Anaya	7.3	4,270.50	Continue drafting motion to strike and related exhibits for Kloppe.
05/14/21	V. Anaya	8.0	4,680.00	Begin drafting Kloppe show cause motion (4.2); Begin reviewing motion for summary judgment and related evidence related to Kloppe (3.8).
05/17/21	V. Anaya	0.4	234.00	Review information on defenses provided by JWC Rentals (0.4).
05/17/21	V. Anaya	6.0	3,510.00	Begin drafting response to motion for summary judgment filed by Kloppe.
05/17/21	V. Anaya	0.2	117.00	Correspond with Med One and McGinnis counsel regarding filing of stipulation of dismissal.
05/17/21	K. Gradney	0.6	117.00	Begin draft of second interim fee application.
05/17/21	K. Gradney	0.4	78.00	Prepare for filing motion for amended scheduling order in JWC Rental adversary (.1); prepare for filing motion for amended scheduling order in Steven Turner Wright adversary (.1); prepare for filing stipulation of dismissal of MedOne adversary (.1); prepare for filing stipulation of dismissal of McGinnis adversary (.1).
05/18/21	V. Anaya	0.8	468.00	Review and revise Greenway settlement agreement (0.2); Prepare for hearing on Massergy, Wright, and JWC Rentals (0.3); Attend docket call hearings on same (0.3).

Reference No.:

Invoice No: 1793787

156819-00001-JFW1

Page 4

Invoice Date: 09/10/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/18/21	V. Anaya	7.6	4,446.00	Continue drafting response to Kloppe Motion for Summary Judgment.
05/19/21	V. Anaya	8.3	4,855.50	Begin drafting Studensky declaration in support of Response to Motion for Summary Judgment (5.4); Continue drafting and revising Response to motion for summary judgment (2.9).
05/19/21	K. Gradney	0.5	97.50	Continue editing second interim fee application.
05/20/21	V. Anaya	1.6	936.00	Review authorities related to preference defenses in relation to motion for summary judgment filed by Kloppe/AAS.
05/21/21	V. Anaya	6.4	3,744.00	Review and revise Response to Motion for Summary Judgment filed by AAS /Kloppe (4.5); Review and revise Studensky declaration (1.2); Review documents on server regarding issues related to same (0.7).
05/22/21	V. Anaya	4.4	2,574.00	Review and revise response to motion for summary judgment and relevant declaration related to AAS/Kloppe.
05/23/21	V. Anaya	0.6	351.00	Review and revise response to AAS/Kloppe Motion for summary judgment (0.5); Correspond with Trustee regarding approval of same (0.1).
05/24/21	V. Anaya	0.4	234.00	Prepare response to AAS/Kloppe MSJ for filing.
05/24/21	K. Gradney	2.1	409.50	Review response to motion for summary judgment and edit same (.4); prepare exhibits to motion to show cause (.6); review motion to show cause and order granting and edit same (.6); multiple email correspondence with J Wertz regarding same (.3); finalize response and motion to show cause for filing (.2).
05/26/21	K. Gradney	0.1	19.50	Draft stipulation extending answer to complaint for Updax defendant.
05/27/21	V. Anaya	0.3	175.50	Correspond with Trustee regarding Quest and Sparks settlement offers (0.1); Correspond with counsel to Quest regarding counteroffer (0.1); Correspond with Pharmerica regarding 9019 (0.1).
05/27/21	V. Anaya	0.4	234.00	Correspond with Wright Medical regarding settlement offer (0.2); Correspond with Greenway regarding settlement proceeds (0.1); Correspond with Leica regarding additional revisions to settlement agreement (0.1).
05/27/21	K. Gradney	0.1	19.50	Prepare for filing stipulation extending answer date for Pharmerica.

Reference No.:

Invoice No: 1793787

156819-00001-JFW1

Page 5

Invoice Date: 09/10/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/28/21	V. Anaya	1.6	936.00	Revise Leica Settlement agreement (0.3); Make additional revisions to same based on suggestions proposed by Trustee (0.2); Correspond with counsel to Leica regarding same (0.1); Correspond with Trustee regarding Praxair settlement funds (0.1); Correspond with Ms. Sparks regarding potential settlement (0.1); Correspond with Wright about settlement agreement (0.2); Draft Sparks settlement agreement (0.2); Review outstanding adversary proceeding issues (0.2); Correspond with Regus regarding settlement funds received (0.1); Correspond with Community trust regarding comments to settlement agreement (0.1).
05/31/21	K. Gradney	0.3	58.50	Review recently entered amended scheduling orders for JWC Rentals and Steven Turner Wright and update calendar with trial setting and related deadlines.
Total Avoidance Action Analysis		83.1	\$ 46,778.50	
Total Fees				\$46,778.50

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Associate:			
V. Anaya	78.40	585.00	\$ 45,864.00
Total Associate	78.40		\$ 45,864.00
Legal Assistants:			
K. Gradney	4.50	195.00	\$ 877.50
Total Legal Assistants	4.50		\$ 877.50
Case Clerks:			
D. Trevino	0.20	185.00	\$ 37.00
Total Case Clerks	0.20		\$ 37.00
TOTAL	83.10		\$ 46,778.50

TOTAL DUE THIS INVOICE:

\$46,778.50



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00001-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1793788
Invoice Date: 09/10/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Preference Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending June 30, 2021:

INVOICE SUMMARY

Total Fees	\$36,779.00
Total Expenses	559.91
Total Due This Invoice:	\$37,338.91

Reference No.:

Invoice No: 1793788

156819-00001-JFW1

Page 2

Invoice Date: 09/10/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
06/01/21	V. Anaya	0.2	117.00	Correspond with Ms. Castleberry regarding status of certain adversary proceedings.
06/01/21	V. Anaya	0.6	351.00	Review and revise Sparks settlement agreement (0.1); Review and revise Greenway stipulation due to settlement terms (0.1); Begin drafting Pharmerica 9019 motion (0.4).
06/01/21	K. Gradney	0.1	19.50	Prepare for filing stipulation extending answer date for Healthcare Trust.
06/02/21	V. Anaya	1.4	819.00	Review reply and motion to strike filed by Kloppe and correspond with J. Wertz regarding same.
06/02/21	K. Gradney	0.2	39.00	Review reply in support of motion for summary judgment filed by Defendant and motion to strike Trustee declaration.
06/03/21	V. Anaya	2.3	1,345.50	Begin drafting 9019 related to Pharmerica (0.4); Begin drafting settlement agreement related to Pharmerica (0.9); Draft settlement agreement related to Quest (0.4); Call with K. Halliburton regarding Quest Settlement Agreement (0.1); Correspond with Trustee regarding Infusion (0.2); Finalize Community Healthcare Stipulation (0.3).
06/03/21	K. Gradney	0.1	19.50	Update answer deadlines for Greenway and Healthcare Trust defendants.
06/04/21	V. Anaya	0.2	117.00	Correspond with S. Casey regarding information on invoices not produced through MSJ.
06/07/21	V. Anaya	2.1	1,228.50	Review declaration from K. Bassett regarding Kloppe matter in response to show cause motion (0.2); Begin drafting response to Kloppe Motion to Strike Response Exhibits (0.7); Review issues related to same (1.0); Call with S. Casey regarding Kloppe Show Cause Motion (0.2).
06/08/21	V. Anaya	4.3	2,515.50	Review Motion to Withdraw deemed admissions filed by Kloppe and determine issues outstanding related to MSJ filed by Kloppe (0.8); Review Response to Show Cause Motion (0.4); Continue drafting Response to Motion to Strike (3.1).
06/08/21	K. Gradney	0.2	39.00	Prepare for filing response to Kloppe motion to strike.
06/09/21	J. Romero	0.5	312.50	Confer with J. Wertz regarding show cause issues in preparation for hearing.
06/09/21	V. Anaya	0.7	409.50	Review and revise Kloppe Notice of Subpoena and Deposition (0.7).

Reference No.:

Invoice No: 1793788

156819-00001-JFW1

Page 3

Invoice Date: 09/10/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
06/09/21	G. Justiss	0.4	124.00	Locate service address for Kimberly "Kim" Basse.
06/09/21	K. Gradney	0.5	97.50	Prepare notice of deposition of K Bassett (.2); revise Rule 45 notice (.2); finalize same for service (.1).
06/10/21	V. Anaya	4.7	2,749.50	Begin drafting FOF and CLAW related to Kloppe adversary proceeding (1.0); Begin drafting Pre-Trial Order related to same (3.7).
06/10/21	K. Gradney	0.6	117.00	Coordinate service of subpoena on K Bassett (.3); prepare Rule 45 subpoena (.3).
06/11/21	V. Anaya	1.0	585.00	Correspond with Beckman Coulter regarding preference analysis (0.1); Correspond with Trustee regarding Sparks settlement (0.1); Review motion to quash filed by Kloppe (0.1); Review and revise Kloppe Pre-Trial Scheduling Order (0.7).
06/11/21	M. Roberts	0.7	395.50	Confer with J. Wertz concerning motion to quash and basis for same under federal rules.
06/11/21	K. Gradney	0.7	136.50	Prepare for filing stipulation of dismissal for Sparks (.1); revise Rule 45 subpoena for Kloppe adversary (.6).
06/14/21	J. Romero	0.5	312.50	Analyze and review motion to quash and privilege log (.3); confer with J. Wertz regarding strategy for addressing same (.2).
06/14/21	V. Anaya	2.3	1,345.50	Continue drafting pre-trial order regarding Kloppe Adversary Proceeding (1.6); Review and revise response to Kloppe Motion to Quash (0.7).
06/15/21	V. Anaya	7.8	4,563.00	Continue drafting findings of fact and conclusions of law for Kloppe adversary proceeding.
06/15/21	V. Anaya	0.4	234.00	Call with S. Casey regarding Motion to Quash and privilege log.
06/15/21	V. Anaya	0.5	292.50	Review and revise motion to quash response.
06/15/21	K. Gradney	0.6	117.00	Prepare response to motion to quash deposition in Kloppe adversary (.3); prepare pretrial order in Kloppe adversary (.2); prepare motion to extend time for Defendant Met Lift to answer complain (.1).
06/15/21	K. Gradney	0.2	39.00	Coordinate transmittal of Quest NS Southwest settlement check to trustee.
06/16/21	J. Romero	0.2	125.00	Confer with J. Wertz regarding strategy issues on Kloppe matter.

Reference No.:

Invoice No: 1793788

156819-00001-JFW1

Page 4

Invoice Date: 09/10/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
06/16/21	V. Anaya	1.8	1,053.00	Correspond with K. Gradney regarding witness and exhibit list for show cause motion (0.1); Correspond with chambers regarding filed findings of fact and conclusions of law (0.1); Correspond with L. Gonzalez regarding Basset declaration (0.1); Call with L. Gonzalez regarding same (0.2); Call with B. Finner regarding same (0.3); Review witness and exhibit list for show cause motion (0.4); Attend hearing on motion to quash (0.4); Review findings of fact and conclusions of law filed by Kloppe (0.2).
06/16/21	V. Anaya	0.6	351.00	Review Met Life avoidance action defenses (0.3); Update status chart regarding all adversary proceedings (0.3).
06/16/21	K. Gradney	0.2	39.00	Prepare for filing witness and exhibit list for contested hearing on motion to dismiss and motion for summary judgment (.1); email correspondence regarding same (.1).
06/16/21	K. Gradney	0.3	58.50	Attend hearing on Defendant Kloppe's motion to quash deposition.
06/16/21	K. Gradney	0.1	19.50	Prepare for filing stipulation extending answer deadline for Met Life.
06/17/21	V. Anaya	3.4	1,989.00	Continue drafting Pharmerica settlement agreement (2.0); Review and revise Pharmerica 9019 motion (1.4).
06/18/21	V. Anaya	0.2	117.00	Review motion to dismiss issues in preparation for hearing on Kloppe motion to dismiss.
06/18/21	V. Anaya	0.6	351.00	Review Texas Mutual defenses to adversary proceeding (0.6).
06/21/21	V. Anaya	9.1	5,323.50	Prepare for hearing on Kloppe motion for summary judgment (6.9); Prepare for hearing on Kloppe motion to dismiss (2.2).
06/22/21	V. Anaya	5.4	3,159.00	Continue preparing for hearing on Kloppe's Motion to Dismiss and Motion for Summary Judgment (4.2); Attend and succesfully argue against Kloppe Motion to Dismiss and Motion for Summary Judgment (1.2).
06/22/21	V. Anaya	0.2	117.00	Correspond with Chambers regarding filing of stipulation of Dismissal in Masergy case (0.1); Correspond with Pharmerica regarding settlement agreement (0.1).
06/23/21	V. Anaya	0.1	58.50	Prepare stipulation of dismissal for PRaxair based on terms of settlement agreement (0.1).
06/25/21	V. Anaya	2.4	1,404.00	Continue review of Texas Mutual defenses (1.8); Revise Pharmerica settlement agreement based on revisions provided by Trustee (0.6).

Reference No.:

Invoice No: 1793788

156819-00001-JFW1

Page 5

Invoice Date: 09/10/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
06/28/21	V. Anaya	2.7	1,579.50	Call with P. Thompson regarding default judgment (0.2); Review documents related to Beckman Coulter defenses (2.5).
06/29/21	V. Anaya	3.5	2,047.50	Review outstanding issues in all remaining adversary proceedings (0.5); Correspond with counsel to JWC regarding outstanding issues (0.1); Correspond with counsel to Wright Medical regarding settlement agreement (0.2); Correspond with counsel to Altaworx regarding settlement agreement (0.1); Correspond with D. Alford regarding outstanding information for adversary (0.1); Prepare stipulation of dismissal for Masergy (0.2); Prepare stipulation of dismissal for Greenway, Community, Regus (0.6); Call with Andrea, former GC, regarding Kloppe adversary proceeding (0.3); Finalize Wright Settlement Agreement and correspond with counsel regarding same (0.3); Review 3M defenses (1.1).
06/29/21	V. Anaya	0.3	175.50	Begin coordinating preparation for Kloppe trial.
06/29/21	K. Gradney	0.2	39.00	Prepare for filing notice of release and satisfaction of judgment with Regus (.1); prepare for filing Greenway and Community Health dismissal (.1).
06/30/21	V. Anaya	0.5	292.50	Call with D. Alford regarding Central Urology (0.1); Correspond with Leica and provide fully executed settlement agreement (0.2); Correspond with Wright regarding extension to fully effectuate terms of settlement agreement (0.2).
06/30/21	K. Gradney	0.1	19.50	Prepare for filing stipulation extending answer deadline.
06/30/21	K. Gradney	0.1	19.50	Prepare for filing stipulation extending answer date for Wright Medical.
Total Avoidance Action Analysis		65.8	\$ 36,779.00	

Total Fees

\$36,779.00

Reference No.:

Invoice No: 1793788

156819-00001-JFW1

Page 6

Invoice Date: 09/10/21

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
J. Romero	1.20	625.00	\$ 750.00
Total Partner	1.20		\$ 750.00
Associate:			
V. Anaya	59.30	585.00	\$ 34,690.50
M. Roberts	0.70	565.00	\$ 395.50
Total Associate	60.00		\$ 35,086.00
Staff Attorneys:			
G. Justiss	0.40	310.00	\$ 124.00
Total Staff Attorneys	0.40		\$ 124.00
Legal Assistants:			
K. Gradney	4.20	195.00	\$ 819.00
Total Legal Assistants	4.20		\$ 819.00
TOTAL	65.80		\$ 36,779.00

Expenses:

Delivery Fees	10.81
Federal Express	20.62
Lexis Research	11.78
Transcripts -VENDOR: Kendra Gradney; INVOICE#: ER333014; DATE: 6/16/2021 - hearing transcript	78.65
VENDOR: Kendra Gradney INVOICE#: ER332982 DATE: 6/17/2021 Miscellaneous Expense - process server	190.00
VENDOR: Kendra Gradney INVOICE#: ER334520 DATE: 6/22/2021 Miscellaneous Expense - hearing transcript	248.05

Total Expenses

559.91

TOTAL DUE THIS INVOICE:

\$37,338.91



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00001-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1793789
Invoice Date: 09/10/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Preference Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending July 30, 2021:

INVOICE SUMMARY

Total Fees	\$19,987.50
Total Expenses	0.00
Total Due This Invoice:	\$19,987.50

Reference No.:

Invoice No: 1793789

156819-00001-JFW1

Page 2

Invoice Date: 09/10/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
07/05/21	K. Gradney	1.0	195.00	Review recently updated dockets and calendar related deadlines to upcoming trial settings and docket calls for various defendants.
07/06/21	V. Anaya	0.7	409.50	Begin preparing for Kloppe trial through preparation of Issue/Proof outline.
07/07/21	V. Anaya	4.2	2,457.00	Review Cortex Medical defenses and correspond with counsel regarding counteroffer (1.0); Review 3M defenses and prepare counteroffer (3.1); Review Wright Medical fully executed settlement agreement (0.1).
07/08/21	V. Anaya	1.5	877.50	Correspond with J. Studensky regarding Leica settlement funds (0.1); Correspond with J. Studensky regarding 3M counteroffer (0.3); Correspond with J. Studensky regarding Georgetown Ob-Gyn settlement offer (0.5); Review Updax defenses and prepare settlement offer for Trustee's review (0.6).
07/09/21	V. Anaya	3.6	2,106.00	Prepare Quest stipulation of dismissal (0.1); Correspond with Chambers regarding certain orders (0.2); Begin drafting issue proof outline for trial (2.1); Call with J. Wertz regarding trial preparation (0.9); Draft Rule 26 disclosures for Texas Mutual (0.3).
07/09/21	K. Gradney	0.1	19.50	Prepare for filing stipulation of dismissal of Quest NS Southwest adversary.
07/12/21	K. Gradney	0.2	39.00	Prepare and finalize for filing stipulation extending Defendant Infusion time to answer complaint.
07/13/21	V. Anaya	0.1	58.50	Correspond with Wright Medical regarding settlement agreement and settlement fund issues.
07/13/21	K. Gradney	0.1	19.50	Update answer deadline for Defendant Infusion.
07/13/21	K. Gradney	0.1	19.50	Email correspondence with J McCann counsel for Wright Medical regarding W-9.
07/15/21	K. Gradney	0.3	58.50	Prepare statement regarding consent on behalf of Trustee in Texas Mutual Case (.2); update internal calendar with related dates and deadlines (.1).
07/19/21	K. Gradney	0.1	19.50	Coordinate hearing transcript for hearing held on June 22 in Advanced Analytical adversary.

Reference No.:

Invoice No: 1793789

156819-00001-JFW1

Page 3

Invoice Date: 09/10/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
07/20/21	V. Anaya	2.4	1,404.00	Correspond with Trustee regarding Leica settlement (0.1); Correspond with Georgetown OB-GYN regarding settlement (0.7); Correspond with Updax regarding settlement offer (0.3); Correspond with Altaworx (0.1); Correspond with Trustee regarding Texas Mutual (0.2); Begin drafting outlines in preparation for Kloppe trial (1.0).
07/21/21	V. Anaya	5.3	3,100.50	Continue preparing for Kloppe trial (4.1); Call with J. Studensky regarding same (1.0); Call with counsel for Pharmerica regarding 9019 and settlement agreement revisions (0.2).
07/21/21	K. Gradney	0.1	19.50	Prepare for filing stipulation of dismissal of Leica Microsystems.
07/22/21	V. Anaya	3.0	1,755.00	Call with J. Wertz regarding trial preparation (0.7); Call with Troy regarding same (0.3); Continue preparing for trial by drafting witness and exhibit list (1.8); Call with counsel for Updax regarding settlement offer (0.2).
07/22/21	K. Gradney	0.3	58.50	Review live adversary proceedings for upcoming deadlines (.2); email correspondence with V Anaya regarding same (.1).
07/23/21	V. Anaya	0.5	292.50	Review 3M's counteroffer and correspond with Trustee regarding same.
07/26/21	V. Anaya	4.9	2,866.50	Call with T. Headden regarding Trustee's offer (0.2); Correspond with T. Headden regarding same (0.1); Review revisions to Pharmerica settlement agreement (0.3); Review issues with Wright and JWC rentals (0.7); Call with counsel for same regarding defenses (0.3); Review adversary tracker and update accordingly based on settlements and revised dates and deadlines (0.6); Call with counsel for updax regarding settlement agreement (0.2); Correspond with counsel to Georgetown OB-GYN regarding settlement and other issues related to preference action (0.5); Review agreement between same parties regarding Stark law (0.2); Draft settlement agreement with Updax (0.3); Review beckman coulter defenses (0.5); Continue preparing for Kloppe trial (1.0).
07/27/21	V. Anaya	2.5	1,462.50	Continue preparing for Kloppe trial (0.5); Call with J. Studensky and J. Wertz regarding trial preparation (1.6); Begin drafting stipulated facts for same (0.4).

Reference No.:

Invoice No: 1793789

156819-00001-JFW1

Page 4

Invoice Date: 09/10/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
07/28/21	V. Anaya	2.0	1,170.00	Call with J. Wertz regarding Georgetown OB-GYN case and Beckman Coulter negotiations (0.5); Correspond with Updox regarding final execution version of settlement agreement (0.1); Call with S. Lemon regarding status of Georgetown OB-GYN case (0.3); Call with counsel to infusion management regarding potential defenses (0.2); Continue drafting stipulation of facts for Kloppe case (0.9).
07/29/21	V. Anaya	0.3	175.50	Correspond with counsel to pharmerica regarding settlement agreement (0.1); Correspond with counsel to 3M regarding settlement offer (0.1); Correspond with counsel to group and pension regarding status of resolving adversary (0.1).
07/30/21	V. Anaya	2.4	1,404.00	Review Pharmerica's revisions to 9019 and settlement agreement (0.2); Review and revise stipulated facts for Kloppe trial (1.7); Draft settlement agreement for Texas Mutual (0.5).
Total Avoidance Action Analysis		35.7	\$ 19,987.50	

Total Fees \$19,987.50

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Associate:			
V. Anaya	33.40	585.00	\$ 19,539.00
Total Associate	33.40		\$ 19,539.00
Legal Assistants:			
K. Gradney	2.30	195.00	\$ 448.50
Total Legal Assistants	2.30		\$ 448.50
TOTAL	35.70		\$ 19,987.50

TOTAL DUE THIS INVOICE:

\$19,987.50

Exhibit E

**Detailed Record of Fees as Special Counsel to the Trustee For Fraudulent Litigation for the
Application Period**



Remit by mail to:
P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:
Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00003-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1797239
Invoice Date: 09/27/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Fraudulent Transfer Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending November 30, 2020:

INVOICE SUMMARY

Total Fees	\$21,938.50
Total Expenses	109.84
Total Due This Invoice:	\$22,048.34

Reference No.:

Invoice No: 1797239

156819-00003-JFW1

Page 2

Invoice Date: 09/27/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
11/06/20	J. Romero	0.4	250.00	Confer with J. Wertz regarding fraudulent transfer actions and case issues.
11/08/20	M. Roberts	0.5	282.50	Research standards for recovery in preparation for drafting discovery.
11/09/20	M. Roberts	0.2	113.00	Review pleading and hearing documents (.1); draft correspondence to J. Romero concerning same (.1).
11/10/20	J. Romero	1.3	812.50	Analyze and review Madison complaint, motion to dismiss on Madison case, amended Madison complaint, and Madison's answer.
11/10/20	J. Romero	0.8	500.00	Analyze and review Borgfeld scheduling order, Borgfeld complaint, motion to dismiss, and amended complaint against Borgfeld.
11/10/20	J. Romero	0.5	312.50	Analyze and review compliant, amended complaint, and motion to dismiss related to Downton.
11/10/20	J. Romero	0.2	125.00	Analyze and review motion to consolidate and related correspondence.
11/11/20	J. Romero	0.2	125.00	Analyze and review additional motion to consolidate cases.
11/12/20	J. Romero	1.6	1,000.00	Draft and edit discovery requests to Borgfeld (1.4); receipt and review additional motion to consolidate (.2).
11/12/20	M. Roberts	0.2	113.00	Review pleadings related to fraudulent transfer action in anticipation of strategy call.
11/13/20	J. Romero	2.2	1,375.00	Teleconference with counsel on D&O claims regarding consolidation motions and strategy (1.0); confer with M. Roberts regarding discovery (.1); work on discovery requests and search terms (1.1).
11/13/20	M. Roberts	1.3	734.50	Prepare for call with lawyers handling D&O adversary concerning motion for consolidation, schedule, and discovery.
11/16/20	J. Romero	2.9	1,812.50	Analyze and review D&O suit and scheduling order to analyze for purposes of proposed consolidation (.8); work on list of relevant custodians, entities, and search terms for electronic evidence gathering and searches (2.1).
11/16/20	N. Smithson	0.9	733.50	Analysis with respect to partnership distributions with respect to federal income tax matters.
11/16/20	C. Luckie	0.5	155.00	Investigate assets owned by Jeffrey P. Madison, Peggy S. Borgfeld, and Ryan H. Downton.

Reference No.:

Invoice No: 1797239

156819-00003-JFW1

Page 3

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
11/16/20	A. Withers	4.1	1,906.50	Analysis of Little River Healthcare Holdings, LLC tax returns including R. Downton K-1s (1.0); discussion with V. Anaya regarding same (.1); discussion with N. Smithson regarding same (.1); preparation of memorandum regarding tax treatment of Little River Healthcare Holdings, LLC and distributions made to R. Downton (2.9).
11/17/20	J. Romero	2.8	1,750.00	Work on memo to trustee outlining motion to consolidate, pros and cons of consolidation, and recommendation regarding same (.9); attend hearing on motion to dismiss claims against Downton (.5); continue work on memo to trustee and search terms (1.1); review memo regarding tax issues with fraudulent transfer claims (.3).
11/17/20	M. Roberts	1.4	791.00	Review pros and cons and federal discovery limitations (1.1); draft correspondence to Mike Wilkins concerning servers (.1); draft correspondence to Vienna Anaya concerning same (.1); review search terms (.1).
11/17/20	M. Roberts	0.1	56.50	Review asset searches related to Defendants' assets.
11/17/20	M. Roberts	0.1	56.50	Speak with Josh Romero concerning strategy.
11/17/20	A. Withers	0.2	93.00	Analysis of memorandum analyzing distributions made to R. Downton and tax treatment thereof.
11/18/20	M. Roberts	0.3	169.50	Review documents related to IT capabilities (.1); speak with V. Anaya concerning IT capabilities and next steps related to e-mails (.2).
11/18/20	A. Withers	0.4	186.00	Discussion with N. Smithson regarding revisions to memorandum analyzing distributions made to R. Downton and tax treatment thereof.
11/19/20	J. Romero	1.1	687.50	Review various correspondence from IT representative regarding email searches (.2); correspond with Graves lawyers and J. Wertz regarding consolidation (.1); draft and edit discovery requests to P. Borgfeld (.8).
11/20/20	J. Romero	0.8	500.00	Review consolidation motions and correspond with opposing counsel regarding same (.4); teleconference with opposing counsel regarding consolidation issues (.2); confer with M. Roberts on amended scheduling order and response to motion to consolidate (.2).
11/20/20	M. Roberts	0.2	113.00	Review deadlines concerning response.

Reference No.:

Invoice No: 1797239

156819-00003-JFW1

Page 4

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
11/23/20	J. Romero	0.7	437.50	Teleconference with M. Powers regarding response to motion to consolidate (.1); confer with M. Roberts regarding draft of response briefs (.1); edit and revise responses to motions to consolidate matters (.3); review and revise proposed order on motion to dismiss (.2).
11/23/20	M. Roberts	2.8	1,582.00	Draft motions related to motion for consolidation; review motions filed in proceedings; correspond with Josh Romero concerning same.
11/23/20	M. Roberts	0.7	395.50	Prepare for call with Jacob Hammersmith by reviewing previous correspondence and search terms (.4); speak with Jacob Hammersmith related to search terms and further searches of gathered documents (.3).
11/23/20	M. Roberts	0.1	56.50	Draft correspondence related to motion to consolidate.
11/24/20	J. Romero	0.3	187.50	Confer with M. Roberts regarding two responses to motions to consolidate cases (.2); review revised response to motion to consolidate from M. Powers (.1).
11/24/20	M. Roberts	1.1	621.50	Multiple correspondences concerning adversary responses (.4); draft additions to adversary responses (.7).
11/24/20	M. Wilkins	2.4	828.00	Create new Relativity workspace (.6); incorporate documents, indexing, threading (1.2); prepare for review (.4).
11/24/20	K. Gradney	0.3	58.50	Prepare for filing Trustee's response to Borgfeld and Madison's motions to consolidate proceedings (.2); coordinate service of same (.1).
11/25/20	M. Roberts	0.1	56.50	Correspond concerning discussions on motions to consolidate.
11/25/20	A. Withers	0.1	46.50	Revision of memorandum discussing partnership taxation considerations with regard to R. Downton distributions.
11/27/20	J. Romero	0.8	500.00	Correspond with co-counsel regarding consolidation motions and discovery issues (.1); teleconference with opposing counsel regarding consolidation issues and discovery (.3); confer with M. Roberts regarding consolidation order and trial schedule (.1); draft detailed correspondence to opposing counsel regarding proposal for consolidation and specific discovery increases (.3).
11/27/20	M. Roberts	0.4	226.00	Prepare for and attend call with opposing counsel concerning consolidation.

Reference No.:

Invoice No: 1797239

156819-00003-JFW1

Page 5

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
11/27/20	A. Withers	1.1	511.50	Further revision of memorandum discussing partnership taxation considerations with regard to R. Downton distributions.
11/30/20	J. Romero	0.5	312.50	Edit and revise proposed order granting consolidation motions (.3); review comments to proposed order and correspondence from J. Wertz regarding same (.2).
11/30/20	N. Smithson	0.9	733.50	Revisions to memorandum regarding partnership tax operations and review of allocations and distributions.
11/30/20	V. Anaya	0.5	292.50	Draft Second Amended Complaint related to Downton.
11/30/20	M. Roberts	0.6	339.00	Draft proposed order related to motion to consolidation (.4); review Jennifer Wertz's comments (.2)
Total Avoidance Action Analysis		38.6	\$ 21,938.50	

Total Fees

\$21,938.50

Reference No.:

Invoice No: 1797239

156819-00003-JFW1

Page 6

Invoice Date: 09/27/21

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
J. Romero	17.10	625.00	\$ 10,687.50
N. Smithson	1.80	815.00	\$ 1,467.00
Total Partner	18.90		\$ 12,154.50
Associate:			
V. Anaya	0.50	585.00	\$ 292.50
M. Roberts	10.10	565.00	\$ 5,706.50
A. Withers	5.90	465.00	\$ 2,743.50
Total Associate	16.50		\$ 8,742.50
Staff Attorneys:			
C. Luckie	0.50	310.00	\$ 155.00
Total Staff Attorneys	0.50		\$ 155.00
Litigation ediscovery Para Professional:			
M. Wilkins	2.40	345.00	\$ 828.00
Total Litigation ediscovery Para Professional	2.40		\$ 828.00
Legal Assistants:			
K. Gradney	0.30	195.00	\$ 58.50
Total Legal Assistants	0.30		\$ 58.50
TOTAL	38.60		\$ 21,938.50

Expenses:

Lexis Research	31.06
Research Services	78.78

Total Expenses 109.84

TOTAL DUE THIS INVOICE: **\$22,048.34**



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00003-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1797240
Invoice Date: 09/27/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Fraudulent Transfer Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending December 31, 2020:

INVOICE SUMMARY

Total Fees	\$12,130.50
Total Expenses	0.00
Total Due This Invoice:	\$12,130.50

Reference No.:

Invoice No: 1797240

156819-00003-JFW1

Page 2

Invoice Date: 09/27/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
12/01/20	J. Romero	1.7	1,062.50	Draft and finalize proposed consolidation order (.2); draft correspondence to counsel in D&O suit regarding drat order (.1); various correspondence with opposing counsel regarding consolidation and proposed consolidation order (.3); draft and finalize discovery requests to Borgfeld (1.1).
12/01/20	M. Roberts	0.4	226.00	Review discovery (.2) correspond related to scheduling (.2)
12/01/20	M. Roberts	0.7	395.50	Draft additions to Downton initial disclosures.
12/02/20	J. Romero	4.2	2,625.00	Draft and finalize discovery requests to P. Borgfield (.7); draft and edit discovery requests to R. Downton (.6); draft and edit discovery requests to Madison (.4); correspond with co-counsel regarding discovery issues and consolidation (.2); analyze and review amended petition in Downton case (.2); edit and revise Rule 26 disclosures to Downton (.2); analyze and review slide deck regarding financial health of various debtor entities before bankruptcy (.3); review revisions to discovery requests and finalize discovery requests to Borgfeld, Downton, and Madison (1.6).
12/02/20	M. Roberts	1.3	734.50	Draft additions to initial disclosure (.7); draft protective order (.4); review amended complaint (.2).
12/02/20	K. Gradney	0.3	58.50	Finalize and prepare for filing second amended complaint (.2); coordinate service of same (.1).
12/03/20	J. Romero	0.3	187.50	Analyze and review revisions to proposed consolidation order from opposing counsel and confer with co-counsel regarding same (.3).
12/03/20	M. Roberts	0.5	282.50	Speak with clerk (.2); correspond with Josh Romero concerning same (.3).
12/04/20	J. Romero	0.7	437.50	Various correspondence with defense counsel regarding consolidation order, depositions, and scheduling order (.3); review various scheduling orders and outline potential new deadlines (.4).
12/04/20	J. Romero	0.2	125.00	Review and respond to correspondence from opposing counsel regarding depositions and discovery (.2).
12/08/20	M. Roberts	0.4	226.00	Speak with Judge Albright's chambers concerning trial setting (.1); draft correspondence to clerk concerning same (.1); correspond with J. Wertz concerning same (.2)

Reference No.:

Invoice No: 1797240

156819-00003-JFW1

Page 3

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
12/09/20	M. Roberts	0.7	395.50	Prepare for call with Judge Albright's clerk concerning trial date (.3); attend call with Judge Albright's clerk concerning trial date (.2); draft correspondence concerning same (.2).
12/11/20	J. Romero	0.4	250.00	Review correspondence from defense counsel regarding discovery (.1); teleconference with counsel regarding discovery issues and strategy (.3).
12/13/20	J. Romero	0.3	187.50	Analyze and review correspondence from M. Sprouse regarding order and mediation (.1); draft proposed response email and circulate to M. Powers for consideration (.2).
12/14/20	J. Romero	0.6	375.00	Receipt and review correspondence from B. Cummings regarding insurance issues (.1); edit and finalize correspondence to M. Sprouse regarding scheduling order, mediation, and insurance issues (.2); review correspondence from B. Cummings regarding mediation and insurance issue (.1); various correspondence with opposing counsel and B. Cummings regarding revisions to consolidation order and scheduling order (.2).
12/15/20	J. Romero	1.9	1,187.50	Analyze and review revisions to proposed consolidation order from opposing counsel (.2); various correspondence with B. Cummings regarding order and provision regarding insurer participation (.2); attend hearing on consolidation motion (.4); draft and edit eight orders on jury demand and consolidation order per court's request (.9); confer with J. Wertz regarding orders and mediation (.2).
12/15/20	J. Romero	1.1	687.50	Analyze and review insurance denial correspondence (.3); draft, edit, and finalize eight orders on jury demand request and consolidation orders (.8).
12/15/20	M. Roberts	0.1	56.50	Draft correspondence to Josh Romero related to trial dates and hearing over jury demand.
12/16/20	J. Romero	1.8	1,125.00	Draft, edit, and revise eight orders on consolidation and jury requests (.9); analyze and review local rules on reference withdrawal and jury demand (.2); correspond with Graves counsel regarding orders (.1); draft correspondence to opposing counsel regarding orders and carrier denial of coverage (.2); work with M. Roberts on document collection issues (.2); review correspondence from defendants regarding draft proposed orders and mediation (.2).
12/16/20	M. Roberts	0.2	113.00	Correspond related to document searches.
12/17/20	A. Withers	0.3	139.50	Revision of memorandum discussing tax treatment of Little River Healthcare Holdings LLC and distributions made to Downton (.2); email correspondence with J. Wertz regarding such (.1).

Reference No.:

Invoice No: 1797240

156819-00003-JFW1

Page 4

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
12/18/20	A. Withers	0.2	93.00	Analysis regarding question from B. Cumings regarding potential reasoning behind distributions made to Downton in excess of tax liability (.1); email correspondence with J. Wertz regarding such (.1).
12/28/20	J. Romero	1.5	937.50	Analyze and review correspondence and revised orders from M. Sprouse (.2); various correspondence with opposing counsel and co-counsel regarding consolidation orders, jury trial orders, and requested extension on discovery (.3); edit and revise consolidation and jury orders (.3); further edits and revisions to orders and discovery plan per discussions with opposing counsel (.7).
12/29/20	J. Romero	0.2	125.00	Draft correspondence to opposing counsel regarding eight proposed orders (.1); confer with K. Gradney regarding filing of orders (.1).
12/29/20	K. Gradney	0.5	97.50	Telephone conference with J Romero regarding proposed orders for upload (.1); prepare agreed orders regarding jury demand and consolidation in each adversary proceeding (.4).
Total Avoidance Action Analysis		20.5	\$ 12,130.50	
Total Fees				\$12,130.50

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
J. Romero	14.90	625.00	\$ 9,312.50
Total Partner	14.90		\$ 9,312.50
Associate:			
M. Roberts	4.30	565.00	\$ 2,429.50
A. Withers	0.50	465.00	\$ 232.50
Total Associate	4.80		\$ 2,662.00
Legal Assistants:			
K. Gradney	0.80	195.00	\$ 156.00
Total Legal Assistants	0.80		\$ 156.00
TOTAL	20.50		\$ 12,130.50

TOTAL DUE THIS INVOICE:

\$12,130.50



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

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Ref No.: 156819-00003-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1797241
Invoice Date: 09/27/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Fraudulent Transfer Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending January 31, 2021:

INVOICE SUMMARY

Total Fees	\$29,695.00
Total Expenses	0.00
Total Due This Invoice:	\$29,695.00

Reference No.:

Invoice No: 1797241

156819-00003-JFW1

Page 2

Invoice Date: 09/27/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
01/05/21	J. Romero	0.3	187.50	Review correspondence and orders from opposing counsel on reference issues (.2); confer with J. Wertz regarding mediations (.1).
01/06/21	J. Romero	0.7	437.50	Review correspondence from B. Cumings regarding proposed order (.1); analyze and review proposed orders (.2); respond to team regarding same (.1); analyze and review redlined orders and comment on same (.2); draft correspondence to opposing counsel regarding revisions to proposed orders (.1).
01/11/21	J. Romero	1.8	1,125.00	Teleconference with opposing counsel regarding reference motion and orders and discovery issues (.2); confer with team regarding same and suggested approach (.2); analyze and review discovery responses and documents from defendants (1.4).
01/11/21	M. Roberts	0.1	56.50	Draft correspondence related to document production.
01/12/21	J. Romero	0.5	312.50	Review correspondence and order from M. Sprouse (.1); review discovery from defendants (.4).
01/12/21	M. Wilkins	0.6	207.00	Receive new documents and incorporate into workspace for review.
01/13/21	J. Romero	0.6	375.00	Teleconference with J. Wertz regarding reference withdrawal issues, mediation, and discovery (.5); confer with M. Roberts regarding document production and review issues (.1).
01/13/21	A. Withers	0.1	46.50	Analysis and review of company agreement and discovery responses in furtherance of analysis of distributions made to R. Downton.
01/13/21	M. Wilkins	0.5	172.50	Receive additional production documents and incorporate into workspace for legal team review.
01/14/21	J. Romero	1.0	625.00	Confer with M. Wilkins regarding document collection and review issues (.3); briefly review documents from Borgfeld (.7).
01/14/21	M. Wilkins	1.3	448.50	Receive documents produced by J Madison and incorporate into workspace for attorney review.
01/15/21	M. Wilkins	0.7	241.50	Receipt of additional production documents and incorporate into workspace.
01/18/21	J. Romero	0.6	375.00	Review documents produced by Borgfeld (.4); correspond with team regarding document review (.2).
01/19/21	J. Romero	0.2	125.00	Various correspondence with team members regarding collection of data and documents from Little River (.2).

Reference No.:

Invoice No: 1797241

156819-00003-JFW1

Page 3

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
01/19/21	M. Roberts	0.8	452.00	Review documents produced to date (.4); correspond with Jacob Hammersmith concerning documents (.2).
01/19/21	M. Wilkins	0.4	138.00	Receipt of additional opposing party production documents and incorporate into workspace for review (.3) analyze options for outside co-counsel access to Relativity (.1).
01/20/21	J. Romero	2.2	1,375.00	Confer with M. Wilkins and M. Roberts regarding document collection and review issues (.4); Teleconference with document review team regarding document collection, discovery, and mediation (.6); analyze tax memo and draft meet-and-confer correspondence to each defendant regarding objections to production of relevant documents (.9); analyze and review defendants' document requests and confer with M. Roberts regarding responses to same (.3).
01/20/21	V. Anaya	0.6	351.00	Call with team regarding discovery issues.
01/20/21	M. Roberts	2.0	1,130.00	Speak with Jacob Hammersmith related to document retrieval (.4); review documents already gathered based on search terms (.8); speak with J. Romero and M. Wilkins concerning document retrieval (.3); attend call with Graves Dougherty attorneys concerning document retrieval (.5)
01/20/21	A. Withers	0.2	93.00	Analysis of company agreements regarding ability to make tax distributions to members.
01/20/21	M. Wilkins	1.0	345.00	Legal team call to discuss data and review with outside co-counsel (.6); analysis of Relativity remote access options for Graves Dougherty attorneys (.4).
01/21/21	J. Romero	0.7	437.50	Analyze and respond to various correspondence from defendants regarding arguments for irrelevancy of personal tax returns (.4); review memo on tax issues (.2); confer with team regarding Defendants' arguments (.1).
01/21/21	M. Roberts	1.1	621.50	Review documents related to company agreements (.6); draft correspondence concerning same to Ashley Withers (.5)
01/21/21	A. Withers	0.6	279.00	Analysis of Little River Healthcare Holdings, LLC company agreement regarding ability to make tax distributions to members (.3); analysis of R. Downton's email regarding treatment of distributions (.3).
01/22/21	J. Romero	0.6	375.00	Analyze and review correspondence from A. Withers regarding legal analysis of tax issues (.2); draft response to same regarding relevancy of personal tax returns (.2); review correspondence from defendants regarding mediation and discovery issues (.2).

Reference No.:

Invoice No: 1797241

156819-00003-JFW1

Page 4

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
01/22/21	A. Withers	6.3	2,929.50	Analysis regarding email by R. Downton and his attorney discussing treatment of discoverability of personal tax returns and permissibility of tax distributions made to him under LLC agreement (.8); analysis of LLC agreement and discussion with N. Smithson regarding same (1.0); analysis of case law cited by R. Downton and analysis of case law related to tax distributions and fraudulent transfer claims (4.5).
01/25/21	M. Roberts	0.3	169.50	Draft multiple correspondences related to document analysis.
01/25/21	A. Withers	4.0	1,860.00	Analysis of case law discussing distributions to company owners that were fraudulent transfers (2.5); analysis of case law regarding discoverability of tax returns and R. Downton's authorities cited to regarding same (1.5).
01/26/21	M. Roberts	0.6	339.00	Prepare for call with Mike Wilkins and Jacob Hammersmith concerning document review (.2); attend call with Mike Wilkins and Jacob Hammersmith concerning same (.3); draft e-mail related to further correspondence concerning same (.1).
01/26/21	A. Withers	3.5	1,627.50	Further analysis of case law discussing distributions to company owners that were fraudulent transfers (2.0); analysis of case law regarding discoverability of tax returns and R. Downton's authorities cited to regarding same (1.5).
01/26/21	M. Wilkins	2.2	759.00	Conference call with J. Hammersmith at SheeldIT on email searches (.5); workspace preparation for outside review access (1.0); review inventory reports (.7).
01/26/21	K. Gradney	0.4	78.00	Draft brief response to Defendants' motion to withdraw the reference (.3); finalize and prepare same for filing (.1).
01/27/21	A. Withers	7.8	3,627.00	Analysis of case law discussing distributions to company owners that were fraudulent transfers (1.0); analysis of case law regarding discoverability of tax returns and R. Downton's authorities cited to regarding same (1.0); preparation of memorandum regarding such analysis (5.8).
01/27/21	M. Wilkins	7.1	2,449.50	Creation of online Relativity instance for sharing purposes with Graves Dougherty team (3.2); permissions, incorporate client documents and production data into workspace (1.6); test outside user permissions and access (.6); prepare review and coding short cut sheets for review team (1.7).
01/28/21	J. Romero	1.0	625.00	Analyze and review memo regarding tax returns (.6); attend Relativity meeting (.4).

Reference No.:

Invoice No: 1797241

156819-00003-JFW1

Page 5

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
01/28/21	V. Argeroplos	2.1	1,039.50	Draft motions for default judgment against Community Healthcare (.7); A&A Telecom et al. (.7); and Peyton Thompson MD (.7).
01/28/21	M. Roberts	1.0	565.00	Attend relativity training related to searching documents pulled from Little River data system.
01/28/21	A. Withers	2.1	976.50	Preparation of memorandum and email to B. Cummings, M. Powers, and others related to case law in support of discoverability of R. Downton's personal tax returns, cases addressing company distributions constituting fraudulent transfers, and related concepts.
01/28/21	M. Wilkins	2.2	759.00	Document search and term hit searches (1.2); training with legal team in Relativity (1.0).
01/29/21	J. Romero	0.8	500.00	Teleconference with B. Cumings and J. Wertz regarding discovery dispute on tax returns and strategy going forward (.4); teleconference with M. Sprouse regarding discovery dispute (.1); draft detailed meet-and-confer letter to defendants' counsel regarding tax returns and mediation (.3).
01/29/21	V. Argeroplos	2.0	990.00	Draft motions for default judgment against Ecomed Imaging (.7), Stericycle (.7), and Specialty Pharmacy (.6).
01/29/21	M. Wilkins	0.2	69.00	Follow-up with J. Hammersmith on filtering and preparation of data exports.
Total Avoidance Action Analysis		62.8	\$ 29,695.00	

Total Fees

\$29,695.00

Reference No.:

Invoice No: 1797241

156819-00003-JFW1

Page 6

Invoice Date: 09/27/21

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
J. Romero	11.00	625.00	\$ 6,875.00
Total Partner	11.00		\$ 6,875.00
Associate:			
V. Anaya	0.60	585.00	\$ 351.00
V. Argeroplos	4.10	495.00	\$ 2,029.50
M. Roberts	5.90	565.00	\$ 3,333.50
A. Withers	24.60	465.00	\$ 11,439.00
Total Associate	35.20		\$ 17,153.00
Litigation ediscovery Para Professional:			
M. Wilkins	16.20	345.00	\$ 5,589.00
Total Litigation ediscovery Para Professional	16.20		\$ 5,589.00
Legal Assistants:			
K. Gradney	0.40	195.00	\$ 78.00
Total Legal Assistants	0.40		\$ 78.00
TOTAL	<u>62.80</u>		<u>\$ 29,695.00</u>

TOTAL DUE THIS INVOICE:

\$29,695.00



Remit by mail to:
P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:
Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00003-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1797242
Invoice Date: 09/27/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Fraudulent Transfer Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending February 28, 2021:

INVOICE SUMMARY

Total Fees	\$67,127.00
Total Expenses	0.00
Total Due This Invoice:	\$67,127.00

Reference No.:

Invoice No: 1797242

156819-00003-JFW1

Page 2

Invoice Date: 09/27/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
02/01/21	J. Romero	4.6	2,875.00	Teleconference with Madison's counsel regarding tax return dispute (.1); draft and edit motion to compel tax records (.7); analyze and review case law for motion to compel tax returns and draft and edit motion to compel (3.8).
02/02/21	J. Romero	5.1	3,187.50	Analyze and review case law for motion to compel (1.1); draft, edit, and finalize motion to compel tax returns (2.4); analyze and review documents produced by defendants (1.3); edit and revise motion or input from counsel (.3).
02/02/21	J. Wertz	0.2	129.00	Review motion to compel drafted by J. Romero.
02/02/21	M. Roberts	0.3	169.50	Analyze issues in anticipation of mediation.
02/03/21	J. Romero	1.9	1,187.50	Draft and finalize motion to compel production of tax returns (.9); correspond with all defendants in effort to get agreement on production (.2); correspond with M. Sprouse regarding agreement to produce tax records (.1); edit and revise motion to compel to remove Borgfeld (.2); draft and finalize proposed order granting motion to compel (.3); draft correspondence to opposing counsel regarding expedited relief (.1); revise motion for expedited relief (.1).
02/03/21	J. Romero	1.0	625.00	Confer with S. Meisel regarding agreement to produce tax returns and protective order (.1); edit and revise motion to compel to remove Madison from claims (.2); review and redline protective order and confer with opposing counsel regarding same (.3); work on motion for expedited ruling (.2); review various correspondence from opposing party regarding discovery dispute and confer with J. Wertz regarding same (.2).
02/03/21	M. Roberts	0.1	56.50	Draft additions to mediation statement.
02/03/21	A. Withers	1.5	697.50	Revision and preparation of memorandum to Trustee regarding tax analysis of Downton distributions and permissibility of such as tax distributions under the company agreement.
02/03/21	M. Wilkins	4.3	1,483.50	Receipt of initial set of filtered data from J. Hammersmith (.6); ingestion and search updates into Nuix (3.7).
02/03/21	K. Gradney	0.5	97.50	Review motion to compel tax returns (.1); draft motion for expedited hearing on same (.3); email correspondence with J Romero and J Wertz regarding same (.1).

Reference No.:

Invoice No: 1797242

156819-00003-JFW1

Page 3

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
02/04/21	J. Romero	0.7	437.50	Review court correspondence regarding hearing setting (.1); confer with team regarding collection of discovery documents (.1); draft motion for entry of protective order and finalize proposed order (.5).
02/04/21	J. Romero	0.6	375.00	Review correspondence from R. Downton regarding tax return dispute and draft response to same (.2); finalize motion for entry of protective order and draft order and correspond with defendants regarding same (.4).
02/04/21	A. Withers	5.6	2,604.00	Further revision and preparation of memorandum to Trustee regarding tax analysis of Downton distributions and permissibility of such as tax distributions under the company agreement.
02/04/21	M. Wilkins	6.8	2,346.00	Retrieve new sets of filtered data and process into workspace (5.9); update document searches (.9).
02/05/21	J. Romero	0.2	125.00	Review and respond to correspondence from opposing counsel regarding protective order (.1); review correspondence from R. Downton regarding motion to compel (.1).
02/05/21	A. Withers	0.4	186.00	Revision of memorandum analyzing tax and corporate aspects of distributions made to R. Downton by Little River Healthcare Holdings, LLC (.3); email correspondence with N. Smithson regarding such (.1).
02/05/21	M. Wilkins	6.6	2,277.00	Continue to receive voluminous collection data from J. Hammersmith and work on incorporating into workspace and filtering and searching data.
02/06/21	M. Roberts	1.5	847.50	Review documents related to mediation statement.
02/07/21	M. Wilkins	3.8	1,311.00	Receipt of additional custodial data from J. Hammersmith (.6); extraction and ingestion into workspace (3.2).
02/08/21	J. Romero	0.2	125.00	Work on mediation statement for submission (.2).
02/08/21	J. Romero	3.7	2,312.50	Analyze and review Borgfeld tax statements for 2016 (.4); analyze and review Downton's response to motion to compel (.9); work on outline for hearing on motion to compel (1.1); teleconference with J. Wertz and M. Roberts regarding Downton's documents referenced in response and case law (.5); analyze and review Faulkner and Reis case for oral argument (.3); analyze and review Downton's financial statements and production (.5).
02/08/21	J. Romero	1.7	1,062.50	Analyze and review case law cited by Downton and prepare for hearing on motion to compel.
02/08/21	J. Wertz	0.9	580.50	Review R. Downton response to motion to compel and K1s and Little River tax return.

Reference No.:

Invoice No: 1797242

156819-00003-JFW1

Page 4

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
02/08/21	M. Roberts	3.9	2,203.50	Review documents related to Trustee's claims in preparation for drafting additions to mediation statement (1.5); draft additions to mediation statement (2.2); speak with J. Romero and J. Wertz concerning status and hearing (.2).
02/08/21	A. Withers	6.0	2,790.00	Analysis and review of tax return information for P. Borgfeld, and J. Madison (2.0); preparation of memorandum analyzing permissibility of tax distributions by Little River Healthcare Holdings LLC in anticipation of mediation (4.0).
02/08/21	M. Wilkins	4.4	1,518.00	Continued data ingestion into workspace (3.4); searching and highlight report updates (.6); prepare data searches (.4).
02/09/21	J. Romero	3.2	2,000.00	Prepare for hearing on motion to compel and review Downton's cases (1.1); attend hearing on motion to compel (.7); teleconference with J. Wertz and B. Cumings regarding mediation and strategy (.3); finalize protective order and motion (.2); draft, edit, and revise mediation statement (.9).
02/09/21	J. Wertz	1.3	838.50	Review and revise draft mediation statement, review updated tax memo by A. Withers in light of tax returns produced (.8); participate in hearing on motion to compel with respect to Downton (.5).
02/09/21	M. Roberts	2.9	1,638.50	Draft additions to mediation statement (2.6); speak with Ashley Withers concerning Kevin Owens (.2); draft correspondence related to new documentation (.1).
02/09/21	A. Withers	3.1	1,441.50	Analysis and review of tax return information for R. Downton (1.0); preparation of memorandum analyzing permissibility of tax distributions by Little River Healthcare Holdings LLC in anticipation of mediation (2.1).
02/09/21	M. Wilkins	3.3	1,138.50	Work on document searches, threading updates (1.2); incorporate Borgfeld, Owens and Madison production supplements into workspace (2.1).
02/09/21	K. Gradney	0.5	97.50	Attend hearing on Trustee's motion to compel tax returns.
02/09/21	K. Gradney	0.4	78.00	Update agreed protective order and prepare same for filing.
02/10/21	J. Romero	7.8	4,875.00	Analyze and review document production and work on mediation presentations (4.7); analyze and review tax memo, company agreement, and tax documents and attend Zoom meeting with team regarding case theory (3.1).

Reference No.:

Invoice No: 1797242

156819-00003-JFW1

Page 5

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
02/10/21	J. Wertz	0.4	258.00	Review and revise draft mediation statement and submit same to Judge Gargotta.
02/10/21	D. Mondragon	2.8	1,218.00	Finalize memo on whether a chapter 7 trustee may step in the shoes of the IRS, or a governmental entity for the purpose of extending the look back period in section 544 as to fraudulent transfers.
02/10/21	M. Roberts	1.5	847.50	Draft additions to mediation statement (.2); attend Zoom call concerning tax distribution figures (1.3).
02/10/21	M. Roberts	0.5	282.50	Analysis tax payments with Ashley Withers and Josh Romero.
02/10/21	A. Withers	1.3	604.50	Conference with B. Cumings, M. Powers, J. Romero, and M. Roberts regarding analysis of R. Downton, P. Borgfeld, and J. Madison's tax returns, alleged tax distributions, and preparation for mediation.
02/10/21	M. Villalpando	0.9	279.00	Assist J. Romero with preparation of graphics presentation for use in upcoming mediation.
02/11/21	J. Romero	4.7	2,937.50	Analyze and review documents and work on mediation presentation (2.1); continue work on mediation presentation and helpful case law to dispel anticipated arguments from defendants (2.6).
02/11/21	J. Wertz	0.5	322.50	Participate in call with J. Studensky, B. Cumings, and J. Romero concerning mediation with Judge Gargotta to develop strategy with respect to same.
02/11/21	M. Roberts	0.2	113.00	Determine company agreement (.1); draft correspondence concerning provisions (.1).
02/11/21	M. Roberts	1.6	904.00	Review mediation powerpoint (.4); draft correspondence concerning same (.1); research case law related to distributions in preparation for mediation (1.1).
02/11/21	M. Villalpando	2.2	682.00	Assist J. Romero with preparation of graphics presentation for use in upcoming mediation.
02/11/21	M. Wilkins	0.4	138.00	Incorporate additional documents into workspace for review.
02/12/21	J. Romero	6.1	3,812.50	Prepare for and attend mediation and confer with team afterwards.
02/12/21	J. Wertz	2.2	1,419.00	Prepare for and participate in mediation on fraudulent transfer/director officer litigation matter with Judge Gargotta.
02/12/21	M. Roberts	3.4	1,921.00	Attend mediation of Trustee's claims.
02/12/21	A. Withers	2.2	1,023.00	Attended mediation with R. Downton, P. Borgfeld, J. Madison, and K. Owens.

Reference No.:

Invoice No: 1797242

156819-00003-JFW1

Page 6

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
02/24/21	J. Romero	0.2	125.00	Confer with team regarding Defendants' discovery requests and document review (.2).
02/24/21	J. Romero	0.8	500.00	Teleconference with trial team regarding scheduling order and document production issues (.5); work on purposed scheduling order (.3).
02/24/21	J. Phillips	0.6	279.00	Analyze pleadings and confer with trial team regarding upcoming document review.
02/24/21	M. Roberts	1.3	734.50	Attend call with team (.5); draft correspondence to Mike Wilkins related to documents (.1); gather documents for document reviewer's consideration (.7).
02/24/21	A. Withers	0.5	232.50	Preparation and compilation of documents and materials relied upon in support of memorandum analysing tax distributions made to Borgfeld, Downton, and Madison.
02/25/21	J. Romero	0.3	187.50	Meet with document review team to discuss document review process and relevant timeline of events.
02/25/21	T. Coates	2.0	800.00	Review complaints in order to analyze client documents for responsiveness (.4); conference regarding same (1.6).
02/25/21	J. Phillips	0.6	279.00	Telephone conference with document review team to discuss strategy for document review efficiency and issues to flag.
02/25/21	M. Roberts	1.4	791.00	Review documents related to production (1.1); attend call concerning document review (.2); draft correspondence to Mike Wilkins concerning same (.1).
02/25/21	M. Wilkins	2.8	966.00	Receipt of M. Nitsch documents (.4); filter data and prepare for batching (2.1); add new users to workspace (.3).
02/26/21	J. Romero	1.4	875.00	Confer with M. Roberts regarding production issues (.1); confer with B. Cummings regarding discovery objections and related issues (.1); edit, draft, and finalize responses and objections to Defendants' first request for production of documents (1.2).
02/26/21	M. Roberts	0.7	395.50	Prepare final document production by discussing confidentiality, determining previous productions, and reviewing documents.
02/26/21	M. Wilkins	1.4	483.00	Incorporate M. Nitsch documents into workspace (.7); preparation of production set (.4); edit batch search criteria and parse documents for batching (.3).
Total Avoidance Action Analysis		133.9	\$ 67,127.00	

Reference No.:

Invoice No: 1797242

156819-00003-JFW1

Page 7

Invoice Date: 09/27/21

Total Fees

\$67,127.00

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
J. Romero	44.20	625.00	\$ 27,625.00
J. Wertz	5.50	645.00	\$ 3,547.50
Total Partner	49.70		\$ 31,172.50
Associate:			
T. Coates	2.00	400.00	\$ 800.00
D. Mondragon	2.80	435.00	\$ 1,218.00
J. Phillips	1.20	465.00	\$ 558.00
M. Roberts	19.30	565.00	\$ 10,904.50
A. Withers	20.60	465.00	\$ 9,579.00
Total Associate	45.90		\$ 23,059.50
Litigation ediscovery Para Professional:			
M. Wilkins	33.80	345.00	\$ 11,661.00
Total Litigation ediscovery Para Professional	33.80		\$ 11,661.00
Litigation Trial Para Professional:			
M. Villalpando	3.10	310.00	\$ 961.00
Total Litigation Trial Para Professional	3.10		\$ 961.00
Legal Assistants:			
K. Gradney	1.40	195.00	\$ 273.00
Total Legal Assistants	1.40		\$ 273.00
TOTAL	133.90		\$ 67,127.00

TOTAL DUE THIS INVOICE:

\$67,127.00



Remit by mail to:
P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:
Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

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Ref No.: 156819-00003-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1797243
Invoice Date: 09/27/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Fraudulent Transfer Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending March 31, 2021:

INVOICE SUMMARY

Total Fees	\$26,153.00
Total Expenses	0.00
Total Due This Invoice:	\$26,153.00

Reference No.:

Invoice No: 1797243

156819-00003-JFW1

Page 2

Invoice Date: 09/27/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
03/01/21	J. Phillips	0.1	46.50	Initial access and overview of review batch structure.
03/02/21	M. Roberts	0.1	56.50	Call Judge Albright's chambers related to obtaining trial date.
03/03/21	M. Roberts	0.1	56.50	Draft correspondence concerning document production.
03/04/21	T. Coates	0.8	320.00	Meeting via Zoom with M. Wilkins and J. Phillips to plan and discuss batching, issue tags, and coding procedures in order to properly analyze and review documents for responding to discovery requests.
03/04/21	T. Coates	0.8	320.00	Review complaints and make notes of key issues in order to consistently code documents responsive to the claims at issue as well as defendant's requests for production.
03/04/21	J. Phillips	0.3	139.50	Team conference regarding upcoming document review strategy to improve efficiency.
03/04/21	M. Roberts	0.2	113.00	Correspond related to document production.
03/04/21	M. Wilkins	3.0	1,035.00	Legal team conference to discuss batch document review (.8); batching set revisions (1.5); prepare cheatsheet for reviewers to use while batching documents out for review (.7).
03/08/21	J. Romero	0.8	500.00	Teleconference with B. Cummings regarding document review and scheduling order issues (.1); work with M. Wilkins and M. Roberts on document review instructions and division of work (.7).
03/08/21	M. Roberts	0.2	113.00	Correspond related to document production.
03/08/21	M. Roberts	0.2	113.00	Review notes related to miscellaneous action (.1); review correspondence with court; review necessary trial date information for judge Albright's court (.1).
03/08/21	M. Wilkins	0.9	310.50	Batch review edits (.4); prepare modified instructions to review team (.5).
03/09/21	J. Romero	0.2	125.00	Correspond with M. Wilkins regarding document review tags (.1); confer with B. Cummings regarding document review cheat sheet and portocols (.1).
03/09/21	J. Phillips	0.6	279.00	Analyze document review instructions provided by B. Cumings and objections to the related requests for production.
03/09/21	M. Roberts	0.1	56.50	Analyze document outlines in preparation for document review to begin.

Reference No.:

Invoice No: 1797243

156819-00003-JFW1

Page 3

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
03/10/21	J. Phillips	0.6	279.00	Analyze documents for privilege and responsiveness (~60 documents).
03/11/21	J. Romero	1.0	625.00	Confer with potential expert witness (.6); confer with M. Roberts regarding document review and production issues (.2); compile documents for expert's review (.2).
03/11/21	A. Griffith	0.3	130.50	Review emails from M. Roberts and M. Wilkins regarding document review.
03/11/21	J. Phillips	0.6	279.00	Review documents for responsiveness and privilege (~ 100 documents).
03/11/21	M. Roberts	0.3	169.50	Multiple correspondences related to setting up new document reviewer to assist with production.
03/11/21	M. Wilkins	0.4	138.00	Create additional user profiles and grant access to workspace (.2); create issue tags for reviewers (.2).
03/12/21	J. Romero	0.3	187.50	Teleconference with potential expert witness regarding case assessment and issues.
03/15/21	M. Wilkins	1.5	517.50	Indexing (.4); active learning analytics set up for review (.9); testing of coding decisions and propagate to appropriate fields (.2).
03/16/21	J. Romero	0.8	500.00	Confer with M. Roberts regarding scheduling order and trial dates (.2); confer with potential expert witness (.6).
03/16/21	A. Griffith	0.4	174.00	Call with M. Roberts regarding facts of the case in preparation for reviewing and analyzing documents.
03/16/21	J. Phillips	1.7	790.50	Review documents for responsiveness and privilege (~180 documents).
03/16/21	M. Roberts	1.0	565.00	Attempt to call court clerk related to trial date (.1); correspond with J. Romero and team concerning same (.1); review documents related to document review (.7); speak with A. Griffith concerning same (.1).
03/16/21	M. Wilkins	1.0	345.00	Permissions, views, analytics index for Active Learning review
03/17/21	A. Griffith	0.1	43.50	Review relevant pleadings in preparation for reviewing documents for relevance and privilege.
03/17/21	M. Roberts	0.5	282.50	Speak with Judge Albright's clerk concerning trial date and procedure (.2); draft correspondence to team concerning same (.3).
03/17/21	M. Wilkins	1.7	586.50	Active learning review set up (1.0); confer with legal team on search questions (.7).
03/18/21	A. Griffith	2.1	913.50	Begin reviewing documents for privilege.

Reference No.:

Invoice No: 1797243

156819-00003-JFW1

Page 4

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
03/18/21	J. Phillips	2.5	1,162.50	Review documents for responsiveness and privilege (~250 documents).
03/18/21	M. Roberts	0.1	56.50	Draft correspondence related to scheduling order.
03/18/21	M. Wilkins	2.7	931.50	Legal team review filtering and searches for Monroe domain (1.4); Active review setup and monitoring based on coding decisions (1.3).
03/19/21	J. Romero	0.3	187.50	Confer with potential forensic accountant expert.
03/19/21	A. Griffith	0.1	43.50	Call with J. Phillips regarding document review and types of documents contained in the document set.
03/19/21	M. Roberts	0.1	56.50	Correspond with team concerning accounting adjustments in 2016.
03/19/21	M. Roberts	0.1	56.50	Draft correspondence concerning scheduling order and speak with Josh Romero concerning strategy.
03/19/21	M. Wilkins	3.4	1,173.00	Searching for P. Ballard term docs (.6); tags (.3); assisted review updates and revisions (2.5).
03/20/21	A. Griffith	1.3	565.50	Review documents for relevance and privilege before production.
03/21/21	A. Griffith	6.3	2,740.50	Review documents for relevance and privilege before production.
03/22/21	J. Romero	0.2	125.00	Analyze and review proposed scheduling order.
03/22/21	A. Griffith	1.0	435.00	Review documents for relevance and privilege.
03/22/21	M. Roberts	0.9	508.50	Draft additions to agreed scheduling order.
03/23/21	J. Romero	0.3	187.50	Confer with potential expert witness regarding matter.
03/25/21	J. Romero	1.3	812.50	Teleconference with potential forensic accounting experts; correspond with team regarding scheduling order; draft correspondence to team regarding testifying experts; finalize proposed scheduling order and correspond with defendants regarding same,
03/25/21	M. Roberts	0.9	508.50	Draft additions to scheduling order for opposing counsels' consideration (.5); research proposed expert (.4)
03/26/21	J. Romero	1.6	1,000.00	Confer with potential expert witness and correspond with team regarding engagement and document requests; confer with B. Cummings regarding expert issues and confer with potential expert regarding same.
03/26/21	A. Griffith	0.8	348.00	Review documents for responsiveness and privilege.
03/28/21	A. Griffith	2.5	1,087.50	Review documents for responsiveness and privilege.
03/29/21	J. Phillips	2.8	1,302.00	Review and analyze documents for responsiveness and privilege (~315 documents).

Reference No.:

Invoice No: 1797243

156819-00003-JFW1

Page 5

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
03/30/21	A. Griffith	0.8	348.00	Review documents for responsiveness and privilege.
03/31/21	J. Romero	1.2	750.00	Teleconference with team regarding discovery issues and expert witnesses; review revisions to scheduling order from defendants and correspond with defendants regarding same.
03/31/21	T. Coates	2.0	800.00	Review documents for privilege and responsiveness to claims and defendant's requests for production.
03/31/21	A. Griffith	0.8	348.00	Review documents for responsiveness and privilege.
03/31/21	M. Roberts	0.9	508.50	Correspond related to document production.
Total Avoidance Action Analysis		57.6	\$ 26,153.00	

Total Fees

\$26,153.00

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
J. Romero	8.00	625.00	\$ 5,000.00
Total Partner	8.00		\$ 5,000.00
Associate:			
T. Coates	3.60	400.00	\$ 1,440.00
A. Griffith	16.50	435.00	\$ 7,177.50
J. Phillips	9.20	465.00	\$ 4,278.00
M. Roberts	5.70	565.00	\$ 3,220.50
Total Associate	35.00		\$ 16,116.00
Litigation ediscovery Para Professional:			
M. Wilkins	14.60	345.00	\$ 5,037.00
Total Litigation ediscovery Para Professional	14.60		\$ 5,037.00
TOTAL	57.60		\$ 26,153.00

TOTAL DUE THIS INVOICE:

\$26,153.00



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P. O. Box 130989
Dallas, Tx 75313-0989

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(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1797244
Invoice Date: 09/27/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Fraudulent Transfer Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending April 30, 2021:

INVOICE SUMMARY

Total Fees	\$29,644.50
Total Expenses	0.00
Total Due This Invoice:	\$29,644.50

Reference No.:

Invoice No: 1797244

156819-00003-JFW1

Page 2

Invoice Date: 09/27/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
04/01/21	T. Coates	0.5	200.00	Phone call to discuss procedures for protecting confidential documents when reviewing documents for responsiveness to defendant's requests for production.
04/01/21	A. Griffith	2.7	1,174.50	Call with M. Roberts regarding parameters of review (.4); review 200 documents for responsiveness and privilege (2.3).
04/01/21	J. Phillips	0.3	139.50	Document review team telephone conference to address new issues and strategy.
04/01/21	M. Roberts	0.4	226.00	Discuss document review with document review team.
04/05/21	J. Romero	0.6	375.00	Confer with potential expert witnesses (.3); correspond with B. Cummings regarding same (.3)
04/05/21	T. Coates	2.0	800.00	Review documents for privilege and responsiveness to discovery requests.
04/05/21	A. Griffith	3.0	1,305.00	Review documents for responsiveness and privilege.
04/06/21	J. Romero	0.3	187.50	Edit and finalize scheduling order and correspond with defendants regarding same.
04/06/21	A. Griffith	2.0	870.00	Review documents for responsiveness and privilege.
04/06/21	K. Gradney	0.2	39.00	Prepare for upload the agreed scheduling order (.1); email correspondence with chambers regarding same (.1).
04/07/21	J. Romero	1.6	1,000.00	Attend conference with potential expert witnesses; confer with D. Studensky regarding same.
04/07/21	A. Griffith	0.8	348.00	Review documents for responsiveness and privilege.
04/08/21	J. Romero	0.6	375.00	Review draft correspondence from M. Roberts to Judge Albright's chambers on trial date; teleconference with team regarding expert witnesses, document review, and pre-trial issues.
04/08/21	A. Griffith	0.2	87.00	Review documents for responsiveness and privilege.
04/08/21	M. Roberts	0.7	395.50	Draft correspondence related to scheduling order (.1); attend weekly check in call (.6)
04/08/21	K. Gradney	0.4	78.00	Review and docket dates and deadlines associated with recently entered agreed scheduling order.
04/09/21	J. Romero	0.1	62.50	Confer with co-counsel regarding expert witnesses.
04/09/21	A. Griffith	1.0	435.00	Review documents for responsiveness and privilege.
04/10/21	A. Griffith	0.8	348.00	Review documents for responsiveness and privilege.

Reference No.:

Invoice No: 1797244

156819-00003-JFW1

Page 3

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
04/11/21	A. Griffith	1.8	783.00	Review documents for responsiveness and privilege.
04/12/21	J. Phillips	1.4	651.00	Review and analyze documents for responsiveness and privilege (~200 documents).
04/13/21	J. Romero	0.6	375.00	Meet with potential expert witnesses and discuss with team.
04/13/21	A. Griffith	2.1	913.50	Review documents for responsiveness and privilege.
04/14/21	A. Griffith	1.8	783.00	Review documents for responsiveness and privilege.
04/15/21	J. Romero	0.6	375.00	Teleconference with team regarding experts and strategy going forward and confer with M. Roberts regarding document review.
04/15/21	A. Griffith	0.4	174.00	Review documents for responsiveness and privilege.
04/15/21	J. Phillips	0.1	46.50	Provide status update to M. Roberts re status of review.
04/15/21	M. Roberts	0.9	508.50	Attend weekly call concerning status.
04/16/21	J. Romero	0.1	62.50	Confer with potential witness regarding meeting.
04/16/21	A. Griffith	1.6	696.00	Review documents for responsiveness and privilege.
04/17/21	A. Griffith	0.4	174.00	Review documents for responsiveness and privilege.
04/19/21	J. Romero	0.2	125.00	Confer with potential expert witness.
04/19/21	A. Griffith	2.4	1,044.00	Review documents for responsiveness and privilege.
04/20/21	A. Griffith	1.3	565.50	Review documents for responsiveness and privilege.
04/20/21	J. Phillips	2.4	1,116.00	Analyze documents for responsiveness and privilege (~ 300 docs).
04/21/21	A. Griffith	0.9	391.50	Review documents for responsiveness and privileges.
04/21/21	J. Phillips	0.9	418.50	Review and analyze documents for responsiveness (~153 documents).
04/21/21	M. Roberts	0.3	169.50	Draft correspondence related to document review status.
04/22/21	J. Romero	0.3	187.50	Work on expert witness engagement.
04/22/21	A. Griffith	1.9	826.50	Review documents for responsiveness and privilege.
04/22/21	M. Roberts	0.4	226.00	Prepare for meeting with team by reviewing status of document production (.1); attend status call (.2); draft correspondence to J. Romero concerning same (.1).
04/23/21	T. Coates	1.0	400.00	Review documents for privilege and responsiveness to discovery requests.
04/23/21	A. Griffith	0.1	43.50	Review documents for responsiveness and privilege.

Reference No.:

Invoice No: 1797244

156819-00003-JFW1

Page 4

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
04/25/21	A. Griffith	3.5	1,522.50	Review documents for responsiveness and privilege.
04/26/21	A. Griffith	4.6	2,001.00	Review documents for responsiveness and privilege.
04/27/21	T. Coates	0.5	200.00	Review documents for privilege and responsiveness to discovery requests.
04/27/21	A. Griffith	3.0	1,305.00	Review documents for privilege and responsiveness.
04/28/21	J. Romero	0.1	62.50	Correspond with team regarding expert witnesses.
04/28/21	T. Coates	4.0	1,600.00	Review documents for privilege and responsiveness to discovery requests.
04/28/21	A. Griffith	2.4	1,044.00	Review documents for responsiveness and privilege.
04/29/21	J. Romero	0.5	312.50	Teleconference with team regarding document review status and expert witnesses.
04/29/21	A. Griffith	2.3	1,000.50	Review documents for responsiveness and privilege.
04/29/21	M. Roberts	0.7	395.50	Prepare for call and attend call related to strategy.
04/29/21	M. Roberts	0.4	226.00	Attend call with Judge Albright's law clerk concerning trial date.
04/29/21	K. Gradney	0.2	39.00	Prepare order granting motion to withdraw the reference for district court.
04/30/21	A. Griffith	1.0	435.00	Review documents for responsiveness and privilege.
Total Avoidance Action Analysis		65.3	\$ 29,644.50	

Total Fees

\$29,644.50

Reference No.:

Invoice No: 1797244

156819-00003-JFW1

Page 5

Invoice Date: 09/27/21

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
J. Romero	5.60	625.00	\$ 3,500.00
Total Partner	5.60		\$ 3,500.00
Associate:			
T. Coates	8.00	400.00	\$ 3,200.00
A. Griffith	42.00	435.00	\$ 18,270.00
J. Phillips	5.10	465.00	\$ 2,371.50
M. Roberts	3.80	565.00	\$ 2,147.00
Total Associate	58.90		\$ 25,988.50
Legal Assistants:			
K. Gradney	0.80	195.00	\$ 156.00
Total Legal Assistants	0.80		\$ 156.00
TOTAL	65.30		\$ 29,644.50

TOTAL DUE THIS INVOICE:

\$29,644.50



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

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Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

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Ref No.: 156819-00003-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1797245
Invoice Date: 09/27/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Fraudulent Transfer Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending May 31, 2021:

INVOICE SUMMARY

Total Fees	\$20,490.00
Total Expenses	1,528.76
Total Due This Invoice:	\$22,018.76

Reference No.:

Invoice No: 1797245

156819-00003-JFW1

Page 2

Invoice Date: 09/27/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Case Administration:</u>				
05/21/21	M. Wilkins	0.2	69.00	RelOne access troubleshooting for V. Anaya
Total Case Administration		0.2	\$ 69.00	
<u>Avoidance Action Analysis:</u>				
05/04/21	A. Griffith	0.1	43.50	Email with M. Wilkins regarding technical issues with attachments in document review.
05/04/21	M. Roberts	0.2	113.00	Draft correspondence related to document review and proposed order.
05/04/21	M. Wilkins	0.3	103.50	Isolate documents with passwords and provide options for review of these documents
05/05/21	A. Griffith	0.6	261.00	Review documents for responsiveness and privilege.
05/06/21	J. Romero	0.5	312.50	Attend trial team meeting to discuss trial date, discovery, and expert witnesses (.4); draft correspondence to opposing counsel regarding trial (.1).
05/06/21	A. Griffith	1.6	696.00	Review documents for responsiveness and privilege.
05/06/21	M. Roberts	0.4	226.00	Prepare for meeting (.1); attend call with team (.3).
05/09/21	A. Griffith	1.2	522.00	Review documents for responsiveness and Privilege.
05/11/21	A. Griffith	0.8	348.00	Review documents for responsiveness and privilege.
05/12/21	J. Romero	0.3	187.50	Confer with B. Cummings regarding expert witness retention (.1); correspond with expert witness (.2).
05/12/21	A. Griffith	2.0	870.00	Review documents for responsiveness and Privilege.
05/12/21	L. Gonzalez	0.9	256.50	Review and analysis of purported email from Stephen Casey to Vienna Anaya and conduct research and reporting on metadata to show that the attachments were indeed created after the original email date in preparation of filing Motion to Strike Motion for Summary Judgment.
05/13/21	J. Romero	0.3	187.50	Teleconference with team regarding discovery and strategy (.2); draft correspondence to defendants regarding trial setting (.1).
05/14/21	A. Griffith	2.3	1,000.50	Review documents for responsiveness and privilege.
05/17/21	A. Griffith	0.2	87.00	Review documents for responsiveness and privilege.
05/17/21	L. Gonzalez	0.9	256.50	Research regarding metadata subject of emails from Stephen Casey regarding discovery requests per V. Anaya.

Reference No.:

Invoice No: 1797245

156819-00003-JFW1

Page 3

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/18/21	D. Lites	1.6	608.00	Analyze and perform forensic analysis on email and attachments from opposing counsel.
05/19/21	J. Romero	0.8	500.00	Confer with expert witness regarding engagement (.2); review and execute expert engagement (.3); confer with opposing counsel regarding trial date (.1); confer with M. Roberts regarding motion for trial date (.2).
05/19/21	M. Roberts	0.2	113.00	Draft correspondence related to motion to enter scheduling order.
05/20/21	J. Romero	0.5	312.50	Conference call with team regarding discovery and trial issues (.3); confer with J. Skaggs regarding document review (.2).
05/20/21	M. Roberts	0.2	113.00	Draft correspondence related to document review.
05/20/21	M. Roberts	0.7	395.50	Draft additions to Joint Motion and Scheduling Order.
05/20/21	M. Wilkins	1.0	345.00	Receive Defendant production documents from Kloppe and AAS and incorporate into workspace for review.
05/23/21	A. Griffith	1.1	478.50	Review documents for responsiveness and privilege.
05/24/21	M. Wilkins	0.2	69.00	New user assignments (.1); forward batch review and instructions to J. Skaggs (.1).
05/25/21	J. Skaggs	2.4	1,440.00	Review and analysis of complaints and mediation statement for this case in order to prepare for document review (.6); e-mail correspondence with J. Romero regarding definitions for the coding of documents (.2); begin review of documents in order to mark for responsiveness and other issues (1.6).
05/25/21	M. Roberts	0.2	113.00	Draft correspondence to J. Skaggs and J. Romero related to document review categories.
05/25/21	D. Trevino	0.8	148.00	Compiling the docket documents from the True Health Adversary in Delaware, circulate to J. Wertz.
05/26/21	J. Skaggs	4.2	2,520.00	Continue review and analysis of batch of potentially responsive documents in order to review for responsiveness and code accordingly.
05/27/21	J. Romero	2.0	1,250.00	Analyze and review counterclaims and amended answer [.5]; review research on dismissal grounds [.4]; attend teleconference with team regarding strategy [1.0]; correspond with opposing counsel regarding document production and responsive pleading extension [.1].
05/27/21	J. Skaggs	2.4	1,440.00	Review and analysis of documents in order to determine whether they are responsive and ready for production.
05/27/21	A. Griffith	0.8	348.00	Review documents for responsiveness and privilege.

Reference No.:

Invoice No: 1797245

156819-00003-JFW1

Page 4

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/27/21	M. Roberts	1.2	678.00	Draft correspondence related to motion to enter scheduling order (.1); attend weekly status call related to strategy (1.0); draft additions to motion (.1).
05/27/21	M. Wilkins	2.7	931.50	Work on identifying documents tagged for production including imaging and isolating native files for production export.
05/28/21	J. Skaggs	2.2	1,320.00	Continued analysis and review of documents involved in case in order to seek out responsive documents and mark the same accordingly.
05/29/21	A. Griffith	0.3	130.50	Review documents for responsiveness and privilege.
05/30/21	A. Griffith	1.9	826.50	Review documents for responsiveness and privileges.
05/31/21	A. Griffith	2.0	870.00	Review documents for responsiveness and privilege.
Total Avoidance Action Analysis		42.0	\$ 20,421.00	

Total Fees

\$20,490.00

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
J. Romero	4.40	625.00	\$ 2,750.00
J. Skaggs	11.20	600.00	\$ 6,720.00
Total Partner	15.60		\$ 9,470.00
Associate:			
A. Griffith	14.90	435.00	\$ 6,481.50
M. Roberts	3.10	565.00	\$ 1,751.50
Total Associate	18.00		\$ 8,233.00
Litigation ediscovery Para Professional:			
L. Gonzalez	1.80	285.00	\$ 513.00
D. Lites	1.60	380.00	\$ 608.00
M. Wilkins	4.40	345.00	\$ 1,518.00
Total Litigation ediscovery Para Professional	7.80		\$ 2,639.00
Case Clerks:			
D. Trevino	0.80	185.00	\$ 148.00
Total Case Clerks	0.80		\$ 148.00
TOTAL	42.20		\$ 20,490.00

Reference No.:

Invoice No: 1797245

156819-00003-JFW1

Page 5

Invoice Date: 09/27/21

Expenses:

Relativity Data Hosting Fee 1,528.76

-Relativity Data Hosting Fee

Total Expenses

1,528.76

TOTAL DUE THIS INVOICE:

\$22,018.76



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00003-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1797246
Invoice Date: 09/27/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Fraudulent Transfer Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending June 30, 2021:

INVOICE SUMMARY

Total Fees	\$64,784.00
Total Expenses	2,261.79
Total Due This Invoice:	\$67,045.79

Reference No.:

Invoice No: 1797246

156819-00003-JFW1

Page 2

Invoice Date: 09/27/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
06/01/21	M. Wilkins	3.7	1,276.50	Finalize voluminous production set and upload to Sharefile ftp for transmittal to parties.
06/02/21	J. Romero	1.0	625.00	Work with M. Wilkins on document production [.4]; edit and finalize motion for extension and proposed order [.2]; correspond with opposing counsel regarding same [.1]; finalize document production and correspond with opposing counsel regarding same [.3].
06/02/21	J. Skaggs	4.4	2,640.00	Review documents received from opposing party in order to seek out responsive documents and mark the same accordingly.
06/02/21	M. Roberts	0.2	113.00	Draft motion to extend deadline.
06/02/21	M. Roberts	0.2	113.00	Discuss discovery response with Jennifer Wertz.
06/02/21	M. Roberts	0.8	452.00	Draft motion to extend.
06/02/21	D. Trevino	0.3	55.50	Compile and circulate to J. Wertz documents filed.
06/03/21	J. Romero	1.6	1,000.00	Work on compiling key financial information and documents for expert witnesses [.9]; work on jury charge issues [.4]; work with M. Wilkins on production issues [.3].
06/03/21	J. Skaggs	1.2	720.00	Continue analysis of documents taken from Ryan Downton's e-mail in order to determine responsiveness of same.
06/03/21	M. Roberts	0.6	339.00	(.5) attend call related to weekly update; (.1) draft email to court clerk concerning update.
06/04/21	J. Skaggs	1.6	960.00	Analysis of documents received from defendants in order to seek out responsive documents and mark accordingly.
06/04/21	M. Roberts	0.2	113.00	Facilitate filing of motion to extend.
06/04/21	M. Wilkins	0.4	138.00	Receipt of documents sent to experts and incorporate into workspace for legal team review.
06/04/21	K. Gradney	0.2	39.00	Prepare for filing agreed motion to extend deadline to file reply.
06/07/21	J. Romero	0.6	375.00	Review correspondence from B. Cumings regarding adversary proceeding (.1); edit and finalize rule 26 disclosures and correspond with team regarding same (.3); review additions and revisions t Rule 26 disclosures (.2).

Reference No.:

Invoice No: 1797246

156819-00003-JFW1

Page 3

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
06/07/21	J. Skaggs	1.7	1,020.00	Analysis of documents filed in Relativity in order to determine whether documents contain pertinent information to be used at trial.
06/07/21	M. Roberts	3.5	1,977.50	Draft initial disclosures (2.6); draft correspondence concerning same(.1); finalize and serve initial disclosures (.8).
06/08/21	J. Skaggs	1.4	840.00	Analysis of documents in order to review for responsiveness and mark accordingly.
06/08/21	M. Roberts	0.2	113.00	Draft correspondence related to clerk and document production.
06/09/21	J. Romero	0.8	500.00	Confer with experts regarding documents and analysis [.4]; work on compiling information for expert review [.4].
06/09/21	J. Skaggs	1.2	720.00	Analysis of documents in order to review for responsiveness and potential use in adversary cases.
06/09/21	M. Roberts	0.2	113.00	Correspondence related to motion to extend.
06/09/21	M. Wilkins	0.2	69.00	Prepare additional user updates (S. Richards) for batch document review.
06/10/21	J. Romero	0.2	125.00	Confer with M. Roberts regarding document review [.1]; review court order on motion for extension [.1].
06/10/21	J. Skaggs	2.6	1,560.00	Continue analysis of documents from Ryan Dounton's e-mail in order to determine importance and responsiveness of documents for these cases.
06/10/21	M. Roberts	0.2	113.00	Draft correspondence related to document review.
06/10/21	S. Richards	1.3	383.50	Review RFP to familiarize myself prior to beginning document review.
06/10/21	S. Richards	0.6	177.00	Review mediation statement to familiarize myself prior to beginning document review.
06/10/21	S. Richards	0.4	118.00	Review and code 57 documents.
06/11/21	J. Skaggs	5.3	3,180.00	Review and analysis of documents in Ryan Dounton's e-mails in order to mark for responsiveness.
06/11/21	S. Richards	3.5	1,032.50	Review and code 443 documents.
06/11/21	S. Richards	0.7	206.50	Review and code 122 documents.
06/13/21	J. Skaggs	1.2	720.00	Continue review and analysis of documents from opposing parties in order to mark for production and non-relevance.

Reference No.:

Invoice No: 1797246

156819-00003-JFW1

Page 4

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
06/14/21	J. Romero	2.0	1,250.00	Call with team regarding case issues and motion to dismiss [.5]; correspond with document reviewers regarding review status [.3]; review suit brought by Downton and others against BCBS [.4]; analyze and review documents prior to production to experts [.8].
06/14/21	J. Skaggs	3.8	2,280.00	Review and analysis of documents from Ryan Downton to determine responsiveness for cases.
06/14/21	M. Roberts	2.5	1,412.50	Work related to document review; attend call with team related to strategy; review documents for provision to experts.
06/14/21	S. Richards	5.5	1,622.50	Review and code 878 documents.
06/14/21	M. Wilkins	0.7	241.50	Work with B. Cumings on searches and tags; conversion of docs for J. Skaggs; update coding/production percentages for M. Roberts.
06/14/21	K. Gradney	0.3	58.50	Revisions to motion to dismiss.
06/15/21	J. Romero	2.3	1,437.50	Analyze and review counterclaims and edit and revise motion to dismiss counterclaims.
06/15/21	J. Romero	0.6	375.00	Edit and revise motion.
06/15/21	J. Skaggs	2.8	1,680.00	Continue analysis of documents received from Defendants in order to mark for responsiveness.
06/15/21	P. Hansen	3.0	1,305.00	Research case law and authority re evidentiary standard governing intent element of federal fraudulent transfer claim.
06/15/21	S. Richards	1.1	324.50	Review and code 210 documents.
06/15/21	S. Richards	4.1	1,209.50	Review and code 652 documents.
06/16/21	J. Romero	0.9	562.50	Draft and finalize motion to dismiss [.4]; review correspondence from client and revise motion accordingly [.3]; review protective order and confer with experts regarding same [.2].
06/16/21	J. Skaggs	0.9	540.00	Continue review of documents in order to mark key documents and remove non-responsive e-mails.
06/16/21	M. Roberts	0.2	113.00	Draft correspondence related to expert review and confidentiality.
06/16/21	S. Richards	0.7	206.50	Review and code 139 documents.
06/16/21	S. Richards	2.2	649.00	Review and code 155 documents.
06/17/21	J. Romero	0.2	125.00	Confer with experts on protective order and documents [.2].
06/17/21	J. Skaggs	3.4	2,040.00	Continued analysis of document group in order to review for responsiveness and usefulness in lawsuits.

Reference No.:

Invoice No: 1797246

156819-00003-JFW1

Page 5

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
06/17/21	M. Roberts	0.7	395.50	Review local rules related to page length and orders; draft order for motion to dismiss; correspond concerning same.
06/17/21	S. Richards	4.2	1,239.00	Review and code documents in Relativity.
06/17/21	M. Wilkins	1.3	448.50	Receive documents sent to experts and incorporate into workspace for legal team review.
06/17/21	K. Gradney	0.2	39.00	Update and prepare for filing motion to dismiss district court matter.
06/18/21	J. Skaggs	1.8	1,080.00	Continue review and analysis of documents received from Debtors to check for responsiveness and for use in litigation.
06/18/21	S. Richards	2.6	767.00	Review and code 302 documents in Relativity.
06/21/21	J. Skaggs	2.9	1,740.00	Continue analysis of documents collected from opposing parties in order to review for responsiveness and importance to cases.
06/21/21	P. Hansen	4.0	1,740.00	Research case law and authority re Section 548 jury instructions.
06/21/21	S. Richards	6.0	1,770.00	Review and code 781 documents.
06/22/21	J. Skaggs	0.4	240.00	Continue review and analysis of document group in order to mark for responsiveness and usefulness for trial.
06/22/21	P. Hansen	3.3	1,435.50	Draft jury charge.
06/22/21	S. Richards	5.4	1,593.00	Review and code 619 documents.
06/22/21	A. Stevens	3.1	837.00	Researching for authority that indicates what standard a majority of courts are using for the intent element of fraudulent transfer claims.
06/22/21	M. Wilkins	1.8	621.00	Password protected document identification and attempts to locate passwords in data set to unlock documents.
06/23/21	P. Hansen	1.0	435.00	Draft jury charge with respect to section 548.
06/23/21	A. Stevens	4.6	1,242.00	Researching secondary sources and drafting email to P. Hansen discussing the trend towards using preponderance of the evidence in fraudulent transfer cases.
06/24/21	A. Griffith	0.6	261.00	Review documents for responsiveness and privilege.
06/24/21	M. Roberts	0.3	169.50	Attend call on update.
06/24/21	M. Wilkins	3.2	1,104.00	Search for passwords on documents in batch review sets and apply to documents to unlock when found.
06/25/21	S. Richards	4.0	1,180.00	Review and code 712 documents.

Reference No.:

Invoice No: 1797246

156819-00003-JFW1

Page 6

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
06/25/21	M. Wilkins	2.8	966.00	Document password searching and application to locked documents in review batch sets.
06/28/21	J. Skaggs	2.1	1,260.00	Analysis and review of documents received from Debtor in order to review for responsiveness and usefulness in lawsuits.
06/28/21	S. Richards	4.5	1,327.50	Review and code 509 documents.
06/29/21	A. Griffith	0.4	174.00	Reviewed documents for responsiveness and privilege.
06/29/21	S. Richards	5.2	1,534.00	Review and code 720 documents.
06/30/21	A. Griffith	0.4	174.00	Review documents for responsiveness and privilege.
06/30/21	S. Richards	5.6	1,652.00	Review and code 791 documents.
Total Avoidance Action Analysis		151.8	\$ 64,784.00	

Total Fees

\$64,784.00

Reference No.:

Invoice No: 1797246

156819-00003-JFW1

Page 7

Invoice Date: 09/27/21

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
J. Romero	10.20	625.00	\$ 6,375.00
J. Skaggs	38.70	600.00	\$ 23,220.00
Total Partner	48.90		\$ 29,595.00
Senior Counsel:			
P. Hansen	11.30	435.00	\$ 4,915.50
Total Senior Counsel	11.30		\$ 4,915.50
Associate:			
A. Griffith	1.40	435.00	\$ 609.00
M. Roberts	9.80	565.00	\$ 5,537.00
Total Associate	11.20		\$ 6,146.00
Staff Attorneys:			
S. Richards	57.60	295.00	\$ 16,992.00
Total Staff Attorneys	57.60		\$ 16,992.00
Litigation ediscovery Para Professional:			
M. Wilkins	14.10	345.00	\$ 4,864.50
Total Litigation ediscovery Para Professional	14.10		\$ 4,864.50
Summer Associates/Law Clerks:			
A. Stevens	7.70	270.00	\$ 2,079.00
Total Summer Associates/Law Clerks	7.70		\$ 2,079.00
Legal Assistants:			
K. Gradney	0.70	195.00	\$ 136.50
Total Legal Assistants	0.70		\$ 136.50
Case Clerks:			
D. Trevino	0.30	185.00	\$ 55.50
Total Case Clerks	0.30		\$ 55.50
TOTAL	151.80		\$ 64,784.00

Expenses:

Relativity Software User Access Fee 540.00

Relativity Data Hosting Fee -Relativity Data Hosting Fee 1,721.79

Total Expenses 2,261.79

TOTAL DUE THIS INVOICE: **\$67,045.79**



Remit by mail to:

P. O. Box 130989
Dallas, Tx 75313-0989

Remit by wire or ACH to:

Bank of America, N.A. Acct # 0180472852
Wire Routing # 026009593
ACH Routing # 111000025
Int'l use only: Swift Code: BOFAUS3N

Federal Tax ID: 75-0764921

**Payment due upon receipt. Please
include Invoice No. with remittance.**

Ref No.: 156819-00003-JFW1
(512)236-2096/lstone@jw.com

Page 1

Invoice No: 1797247
Invoice Date: 09/27/2021

James Studensky, Chapter 7 Trustee
Via Email: jstudensky.trustee@outlook.com

Re: Fraudulent Transfer Litigation

FOR LEGAL SERVICES RENDERED and expenses incurred in connection with the above-referenced matter for the period ending July 31, 2021:

INVOICE SUMMARY

Total Fees	\$35,879.50
Total Expenses	2,313.76
Total Due This Invoice:	\$38,193.26

Reference No.:

Invoice No: 1797247

156819-00003-JFW1

Page 2

Invoice Date: 09/27/21

TIME DETAIL:

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Avoidance Action Analysis:</u>				
07/01/21	J. Romero	0.9	562.50	Teleconference with trial team regarding case status and strategy [.5]; confer with P. Hansen regarding consolidation of complaints and amendments [.2]; review financial documents for expert witness use [.2].
07/01/21	S. Richards	5.0	1,475.00	Review and code 865 documents.
07/02/21	S. Richards	4.1	1,209.50	Review and code 571 documents.
07/06/21	J. Romero	0.7	437.50	Work on amended complaint [.3]; edit and revise response to motion to stay counterclaims [.4].
07/06/21	M. Roberts	0.2	113.00	Review draft motion in opposition to stay.
07/06/21	S. Richards	5.2	1,534.00	Review and code 731 documents.
07/06/21	K. Gradney	0.3	58.50	Prepare for filing response to motion to stay (.1); execute service upon defendants (.2).
07/07/21	J. Romero	0.6	375.00	Review Downton's response to motion to dismiss and edit and revise reply to same.
07/07/21	C. Luckie	0.2	62.00	Investigate the ownership of the property at 193 Dorado Beach East Dorado, PR.
07/07/21	S. Richards	3.1	914.50	Review and code 513 documents.
07/08/21	J. Romero	1.1	687.50	Draft and edit amended and consolidated complaint.
07/08/21	J. Skaggs	1.2	720.00	Continue review of documents received from defendants to search for responsive and useful documents.
07/08/21	P. Hansen	1.7	739.50	Draft consolidated and amended complaint in adversary proceeding.
07/08/21	A. Griffith	0.7	304.50	Review documents for responsiveness and privilege.
07/08/21	M. Roberts	0.8	452.00	Attend call regarding strategy.
07/08/21	S. Richards	4.6	1,357.00	Review and code 701 documents.
07/08/21	D. Williams	0.8	224.00	Researched and downloaded live pleadings and docket sheets from the PACER court website and forwarded to P. Hansen.
07/08/21	K. Gradney	0.2	39.00	Finalize for filing reply in support of motion to dismiss counterclaims.
07/09/21	J. Romero	1.1	687.50	Correspond with opposing counsel regarding opposition to counterclaims and motion for leave to amend complaint [.2]; edit and finalize motion for leave to file amended complaint [.3]; work on amended complaint [.6].

Reference No.:

Invoice No: 1797247

156819-00003-JFW1

Page 3

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
07/09/21	P. Hansen	0.5	217.50	Draft motion for leave to file amended complaint.
07/09/21	P. Hansen	0.6	261.00	Review and edit amended complaint.
07/09/21	A. Griffith	0.8	348.00	Review documents for responsiveness and privilege.
07/09/21	M. Roberts	0.1	56.50	Draft additions to complaint.
07/09/21	M. Roberts	0.4	226.00	Draft additions to proposed order and motion for leave.
07/09/21	S. Richards	3.2	944.00	Review and code 366 documents.
07/09/21	K. Gradney	0.5	97.50	Review motion for leave to file amended complaint and update same (.2); review order approving same and make edits (.1); finalize motion for leave, complaint and revised order for filing (.2).
07/12/21	S. Richards	4.8	1,416.00	Review and code 519 documents.
07/13/21	J. Romero	0.4	250.00	Analyze and review motion to lift stay for D&O insurance and related correspondence from carrier.
07/13/21	A. Griffith	0.3	130.50	Review documents for responsiveness and privilege.
07/13/21	M. Roberts	0.4	226.00	Review Joint Motion to Lift Stay to Pursue D&O Coverage (.2); review correspondence related to Joint Motion to Lift Stay to Pursue D&O Coverage (.2).
07/13/21	S. Richards	4.2	1,239.00	Review and code 502 documents.
07/14/21	S. Richards	4.5	1,327.50	Review and code 551 documents.
07/15/21	J. Romero	1.2	750.00	Confer with expert witnesses regarding analysis of documents [.3]; teleconference with team regarding litigation strategy and update [.5].; review documents for provision to experts [.6].
07/15/21	M. Roberts	0.4	226.00	Attend call related to strategy.
07/15/21	S. Richards	6.1	1,799.50	Review and code 885 documents.
07/15/21	S. Richards	1.3	383.50	Review and code 201 documents.
07/15/21	M. Wilkins	0.7	241.50	Retrieve documents from iManage and Sharefile consisting of additional data sent to experts (.4); incorporate data into workspace for preservation (.3).
07/16/21	J. Romero	0.4	250.00	Review insurance correspondence from opposing counsel and related correspondence on coverage.
07/16/21	S. Richards	5.2	1,534.00	Review and code 729 documents.
07/17/21	S. Richards	2.0	590.00	Review and code 275 documents.
07/19/21	S. Richards	3.0	885.00	Review and code 300 documents.
07/21/21	A. Griffith	0.5	217.50	Review documents for responsiveness and privilege.

Reference No.:

Invoice No: 1797247

156819-00003-JFW1

Page 4

Invoice Date: 09/27/21

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
07/22/21	J. Romero	1.1	687.50	Teleconference with trial team regarding motions and pending issues [.5]; confer with expert witnesses [.2]; edit and revise response brief [.4].
07/22/21	M. Roberts	0.5	282.50	Attend weekly strategy call.
07/22/21	S. Richards	5.2	1,534.00	Review and code 709 documents.
07/23/21	A. Griffith	1.0	435.00	Review documents for responsiveness and privilege.
07/23/21	S. Richards	3.7	1,091.50	Review and code 406 documents.
07/26/21	J. Romero	0.2	125.00	Confer with expert witnesses regarding analysis.
07/26/21	A. Griffith	0.6	261.00	Review documents for responsiveness and privilege.
07/26/21	S. Richards	1.0	295.00	Review and code 97 documents.
07/27/21	S. Richards	1.7	501.50	Review and code 203 documents.
07/28/21	S. Richards	3.7	1,091.50	Review and code 402 documents.
07/29/21	J. Romero	0.2	125.00	Confer with M. Roberts regarding document production issues and expert witness analysis.
07/29/21	J. Romero	0.2	125.00	Review subpoena to Monroe and confer with team regarding same.
07/29/21	S. Richards	3.5	1,032.50	Review and code 395 documents.
07/30/21	J. Romero	0.4	250.00	Teleconference with experts regarding analysis [.4]; work with document reviewers to compile relevant documents for experts [.4].
07/30/21	J. Skaggs	0.8	480.00	Telephone conference with J. Romero and M. Roberts regarding documents found in document review (.1); continue review and analysis of documents produced in order to determine responsiveness and importance to case of same (.7).
07/30/21	M. Roberts	0.5	282.50	Attend call with experts to discuss document review.
07/30/21	S. Richards	5.7	1,681.50	Review and code 795 documents.
07/30/21	S. Richards	0.1	29.50	Discuss with Josh Romero latest requests from economic experts and document review strategy to answer their requests.
Total Avoidance Action Analysis		104.1	\$ 35,879.50	

Total Fees

\$35,879.50

Reference No.:

Invoice No: 1797247

156819-00003-JFW1

Page 5

Invoice Date: 09/27/21

SUMMARY BY TIMEKEEPER

	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Partner:			
J. Romero	8.50	625.00	\$ 5,312.50
J. Skaggs	2.00	600.00	\$ 1,200.00
Total Partner	10.50		\$ 6,512.50
Senior Counsel:			
P. Hansen	2.80	435.00	\$ 1,218.00
Total Senior Counsel	2.80		\$ 1,218.00
Associate:			
A. Griffith	3.90	435.00	\$ 1,696.50
M. Roberts	3.30	565.00	\$ 1,864.50
Total Associate	7.20		\$ 3,561.00
Staff Attorneys:			
C. Luckie	0.20	310.00	\$ 62.00
S. Richards	80.90	295.00	\$ 23,865.50
Total Staff Attorneys	81.10		\$ 23,927.50
Paralegal:			
D. Williams	0.80	280.00	\$ 224.00
Total Paralegal	0.80		\$ 224.00
Litigation ediscovery Para Professional:			
M. Wilkins	0.70	345.00	\$ 241.50
Total Litigation ediscovery Para Professional	0.70		\$ 241.50
Legal Assistants:			
K. Gradney	1.00	195.00	\$ 195.00
Total Legal Assistants	1.00		\$ 195.00
TOTAL	<u>104.10</u>		<u>\$ 35,879.50</u>

Expenses:

Lexis Research	50.26
Relativity Software User Access Fee	540.00
Relativity Data Hosting Fee -Relativity Data Hosting Fee	1,723.50

Total Expenses 2,313.76

TOTAL DUE THIS INVOICE: **\$38,193.26**

IN THE UNITED STATES BANKRUPTCY COURT
FOR WESTERN DISTRICT OF TEXAS
WACO DIVISION

IN RE:	§	
LITTLE RIVER HEALTHCARE	§	CASE NO. 18-60526-RBK
HOLDINGS, LLC, <i>et al.</i> , ¹	§	
	§	CHAPTER 7
Debtors.	§	

**NOTICE OF FILING OF SECOND INTERIM FEE APPLICATION OF
JACKSON WALKER LLP, AS SPECIAL COUNSEL TO THE TRUSTEE**

Jackson Walker, LLP (“JW”), as special counsel to James Studensky, the duly appointed Chapter 7 Trustee (the “Trustee”) for Little River Healthcare Holdings, LLC, *et al.* (the “Debtors”), hereby serves this notice to those listed on the attached creditors mailing matrix that JW has filed its *Second Interim Fee Application for Allowance and Payment of Fees and Expenses as Special Counsel to the Trustee for the Period November 1, 2020 Through July 31, 2021* (“Second Interim Fee Application”) in the above-styled and numbered case, and that the complete Second Interim Fee Application filing referenced above can be obtained: (a) for a fee, by going to <https://www.pacer.gov/>; or (b) for no fee, by contacting special counsel to the Trustee, Jennifer F. Wertz by email at jwertz@jw.com with a subject line of: “Little River – Case No. 18-60526-rbk”.

Attached to this Notice is a copy of the Second Interim Fee Application Summary, which was **Exhibit A** to the Interim Fee Application filed. Unless you wish to object to the proposed

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Compass Pointe Holdings, LLC (1142), Little River Healthcare Holdings, LLC (7956), Timberlands Healthcare, LLC (1890), King’s Daughters Pharmacy, LLC (7097), Rockdale Blackhawk, LLC (0791), Little River Healthcare - Physicians of King’s Daughters, LLC (5264), Cantera Way Ventures, LLC (7815), and Little River Healthcare Management, LLC (6688)

Second Interim Fee Application within 21 days of the date of this Notice, you do not need to take any further action in this regard.

Dated: December 14, 2021

Respectfully Submitted,

By: /s/ James Studensky

James Studensky, Chapter 7 Trustee

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100 Congress Avenue, Suite 1100
Austin, TX 78701
(512) 236-2000 – Telephone
(512) 236-2002 – Facsimile

/s/ Jennifer F. Wertz

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**COUNSEL FOR JAMES STUDENSKY,
CHAPTER 7 TRUSTEE**

Certificate of Service

I hereby certify that this Notice to Creditors and the Fee Application Summary (Exhibit A to this Interim Fee Application) shall be served on all parties on the service matrix attached hereto by U.S. Mail, postage paid, within five business days of the date of filing.

/s/ Jennifer F. Wertz

Jennifer F. Wertz

Service List

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100 Congress Avenue, Suite 1800 Austin,
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Internal Revenue Service Centralized
Insolvency Office
PO Box 7346
Philadelphia, PA 19101-7346

Texas Attorney General's Office
Bankruptcy-Collections Division 300 W
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PO Box 12548-MC 008
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Norton Rose Fulbright US LLP Attn:
Michael M. Parker, Ryan E. Manns
300 Convent Street, Suite 2100
San Antonio, TX 7820

Texas Comptroller Of Public Accounts
Revenue
Accounting Division Bankruptcy Section
PO Box 13528 Capital Station Austin, TX
78711

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Austin, TX 78701

Texas Comptroller Of Public Accounts
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Accounting Division Bankruptcy Section
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111 East 17th Street
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Texas State Board of Pharmacy
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Commission
Attn: J. Casey Roy Assistant Attorney
General Bankruptcy & Collections Div.
PO Box 12548-MC 008
Austin, TX 78711-2548
Texas Workforce Commission
Regulatory Integrity Division
Collections & Civil Actions Dept.
101 East 15th Street, Room 556
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F0005-055
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Des Moines, IA 50309

American Express 1017
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