

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE
PERIOD OCTOBER 14, 2021 THROUGH NOVEMBER 30, 2021**

Debtor: LTL Management LLC

Applicant: McCarter & English, LLP

Case No.: 21-30589-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the "Petition Date")

**SECTION 1
FEE SUMMARY**

☒ Interim Fee Application No. 1 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from October 14, 2021 through November 30, 2021 (the "First Statement Period").

Total Fees:	\$119,570.27
Total Disbursements:	\$19.81
Total Fees Plus Disbursements:	\$119,590.08
Minus 20% Holdback of Fees:	\$23,914.05
Amount Sought at this Time:	\$95,676.03

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	<u>0</u>	<u>0</u>
Total Fees Allowed to Date:	<u>0</u>	<u>0</u>
Total Retainer (If Applicable):	<u>0</u>	<u>0</u>
Total Holdback (If Applicable):	<u>0</u>	<u>0</u>
Total Received by Applicant:	<u>0</u>	<u>0</u>

Name of Professional & Title	Year Admitted	Hours	Rate (discounted from standard)	Fees
Thomas W. Ladd, Esq., Partner	1986	60.8	\$688	\$41,830.40
Brett Kahn, Esq., Partner	2008	124.2	\$446	\$55,393.20
Jennifer Farina, Esq., Partner	2005	23.5	\$446	\$11,635.40
Geoffrey Lynott, Esq., Associate	2019	28.1	\$366	\$10,132.80
Andrew G. Heckler, Esq., Associate	2019	46.4	\$342	\$15,868.80
Ashley D. McWilliams, Esq., Associate	2019	48	\$303	\$14,544.00
Darren Smolarski, Esq., Associate	2019	43.5	\$342	\$14,877.00
Georgia Bender, Esq., Associate	2021	11.7	\$320	\$3,744.00
Deborah Brown, Paralegal		39.1	\$248	\$9,696.80

SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) Asset Disposition: Sales, leases, abandonment and related transaction work.		
c) Avoidance Action Litigation: Preference and fraudulent transfer litigation.		
d) Business Operations: Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) Case Administration: Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.		
f) Claims Administration and Objections: Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) Employee Benefits/Pensions: Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) Fee/Employment Applications: Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	46.4	20,834.40
i) Fee/Employment Objections: Review of an objections to the employment and fee applications of others.		
j) Financing: Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) Litigation: Other than Avoidance Action Litigation (there should be a separate category established for each major matter).		

SERVICES RENDERED	HOURS	FEES
l) Meetings of Creditors: Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.		
m) Plan and Disclosure Statement: Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.		
n) Relief from Stay Proceedings: Matters relating to termination or continuation of automatic stay under 362.		
o) Accounting/Auditing: Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) Business Analysis: Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) Corporate Finance: Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) Data Analysis: Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) Litigation Consulting: Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	378.9	\$98,735.87
t) Reconstruction Accounting: Reconstructing books and records from past transactions and brining accounting current.		
u) Tax Issues: Analysis of tax issues and preparation of state and federal tax returns.		

SERVICES RENDERED	HOURS	FEEs
v) Valuation: Appraise or review appraisals of assets.		
w) Travel Time: Please note that non-working travel time must be billed at 50% of cost.		
SERVICE TOTALS	425.3	119,570.27

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
Federal Express	\$19.81
DISBURSEMENTS TOTALS	\$19.81

**SECTION IV
CASE HISTORY**

1. Date of Retention: December 16, 2021, effective as of the Petition Date [Dkt. 861] (the "Retention Order").¹

2. Summary explaining the nature of the work performed and the results achieved:²

During the First Statement Period, McCarter & English professionals and paraprofessionals performed the following work on behalf of the Debtor:

- Assisted with preparation for hearings and preparation of motions and other documents, as related to insurance coverage issues, in connection with commencement of this chapter 11 bankruptcy case;
- Assisted with responses to discovery demands relating to insurance coverage issues in bankruptcy case;
- Reviewed, analyzed and prepared documents relating to insurance coverage issues for production in bankruptcy case and communicating with other Debtor counsel regarding same;
- Analyzed insurance policies and related case materials with respect to insurance coverage issues arising in bankruptcy;
- Analyzed bankruptcy case materials with respect to issues impacting New Jersey coverage litigation;
- Analyzed insurer document productions with respect to issues impacting insurance recovery;
- Drafted, revised and prepared for filing retention application and communicating with U.S. Trustee regarding issues relating to same;
- Communicated with other Debtor counsel as appropriate regarding various insurance coverage issues and related strategy; and
- Conducted legal research on discrete insurance coverage issues arising in bankruptcy and issues impacting New Jersey coverage litigation.

I certify under penalty of perjury that the above is true.

Date: December 30, 2021

/s/ Thomas W. Ladd
Thomas W. Ladd

¹ The Retention Order is attached hereto as Exhibit A.

² The summary set forth below is qualified in its entirety by reference to the time and services detail in the invoices attached hereto as Exhibit B.