

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET FOR THE PERIOD
NOVEMBER 15, 2021 THROUGH DECEMBER 15, 2021

Debtor: LTL Management LLC Applicant: Genova Burns LLC
Case No.: 21-30589(MBK) Client: Official Comm of Talc Claimant
Chapter: 11 Case Filed: October 14, 2021

SECTION 1
FEE SUMMARY

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

Summary of Amounts Requested for the Period from November 15, 2021 through December 15, 2021
(the "First Statement Period")

Total Fees: \$148,385.00
Total Disbursements: \$ 1,009.45
Minus 20% holdback of Fees: \$ 29,677.00
Amount Sought at this Time: \$119,717.45*

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years Of Professional Service)	HOURS	RATE	FEE
1. Angelo J. Genova, Senior Partner	1979	.80	850.00	680.00
2. James M. Burns, Senior Partner	1982	1.70	600.00	1,020.00
3. Daniel M. Stolz, Partner	1980	131.10	650.00	85,215.00
4. Scott S. Rever	1994	2.10	500.00	1,050.00
5. Donald W. Clarke	2008	94.60	500.00	47,300.00
6. Matthew I. Baker	2013	5.10	400.00	2,040.00
7. Lorrie Denson	Paralegal	55.40	200.00	11,080.00

Fee Totals: \$ 148,385.00
Disbursements Totals: \$ 1,009.45
Total Fee Application \$149,394.45*

**SECTION II SUMMARY
OF SERVICES**

SERVICES RENDERED	HOURS	FEE
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.	274.60	142,205.00
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.	8.90	2,860.00
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).	5.10	2,040.00
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.		

SERVICES RENDERED	HOURS	FEE
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.		
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.		
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.		
v) Valuation Appraise or review appraisals of assets.		
w) Travel Time	2.20	1,280.00
SERVICE TOTALS:	290.80	\$148,385.00

SECTION III SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	188.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	
d) Fax Include per page fee charged.	

e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.	
f) In-house Reproduction Services Exclusive of overhead charges.	138.40
g) Outside Reproduction Services Including scanning services.	
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	
i) Court Reporting Transcripts.	507.25
j) Travel Mileage, tolls, airfare, parking.	
k) Courier & Express Carriers Overnight and personal delivery.	
l) Postage	13.70
m) Other (specify) Subpoena Fees	162.10
DISBURSEMENTS TOTAL:	\$1,009.45

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

Date: January 3, 2022

/s/ Daniel M. Stolz

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:



Order Filed on December 16, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Case No.: _____

Chapter: _____

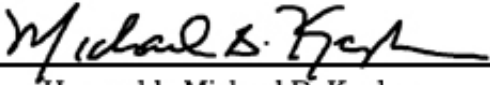
Judge: _____

REVISED

ORDER AUTHORIZING RETENTION OF

The relief set forth on the following page is **ORDERED**.

DATED: December 16, 2021



Honorable Michael B. Kaplan
United States Bankruptcy Judge

Upon the applicant's request for authorization to retain _____
as _____, it is hereby ORDERED:

1. The applicant is authorized to retain the above party in the professional capacity noted.
The professional's address is: _____

2. Compensation will be paid in such amounts as may be allowed by the Court on proper application(s).
3. If the professional requested a waiver as noted below, it is ☐ Granted ☐ Denied.
☐ Waiver, under D.N.J. LBR 2014-2(b), of the requirements of D.N.J. LBR 2016-1.
☐ Waiver, under D.N.J. LBR 2014-3, of the requirements of D.N.J. LBR 2016-1 in a chapter 13 case. Payment to the professional may only be made after satisfactory completion of services.
4. The effective date of retention is ~~the date the application was filed with the Court~~
as of November 15, 2021.
5. The terms of retention shall be as follows:
(i) Genova Burns will only bill 50% for non-working travel and shall not seek the reimbursement of any fees or costs, including attorney fees and costs, arising from the defense of any of Genova Burns' fee applications in this case;
(ii) Genova Burns will agree to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "U.S. Trustee Guidelines");
(iii) Genova Burns will use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category");
(iv) Genova Burns will provide any and all monthly fee statements, interim fee applications, and final fee applications in "LEDES" format to the United States Trustee; and
(v) any and all compensation to be paid to Genova Burns for services rendered on the Talc Committee's behalf shall be fixed by application to this Court in accordance with Sections 330 and 331 of the Bankruptcy Code, such Federal Rules and Local Rules as may then be applicable, and any orders entered in this case governing the compensation and reimbursement of professionals for services rendered and charges and disbursements incurred.