

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION**

In re:

ROMAN CATHOLIC DIOCESE OF
HARRISBURG,

Debtor.¹

Chapter 11

Case No. 1:20-bk-00599 (HWV)

**TWENTY-FOURTH MONTHLY FEE STATEMENT OF WALLER LANSDEN
DORTCH & DAVIS, LLP, FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE
DEBTOR FOR THE PERIOD OF FEBRUARY 1, 2022 THROUGH FEBRUARY 28, 2022**

| | |
|---|--|
| Name of Applicant | Waller Lansden Dortch & Davis, LLP |
| Authorized to provide professional services to | Debtor and Debtor-in-Possession |
| Effective Date of Retention | April 15, 2020, <i>nunc pro tunc</i> to February 19, 2020 (the “ <i>Petition Date</i> ”) |
| Period for which compensation and reimbursement are sought | February 1, 2022 through February 28, 2022 |
| Amount of Compensation sought as actual, reasonable and necessary | \$72,378.00 |
| Amount of Expense Reimbursement sought as actual, reasonable and necessary | \$1,169.62 |
| Total Amount Sought | \$73,547.62 |
| Total Amount of Compensation (at 80%) and Expenses (at 100%) authorized to be paid per monthly fee applications | \$59,072.02 |
| Blended Rate for all Attorneys | \$456.34 |
| Blended Rate for all Timekeepers | \$447.61 |

¹ The last four digits of the Debtor’s federal tax identification number are: 4791. The Debtor’s principal place of business is located at 4800 Union Deposit Road, Harrisburg, Pennsylvania 17111.

1. Pursuant to sections 327, 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**”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 121] (the “**Interim Compensation Order**”), the law firm of Waller Lansden Dortch & Davis, LLP (“**Waller**”), counsel to the Roman Catholic Diocese of Harrisburg, as debtor and debtor in possession (the “**Debtor**”), hereby files this monthly fee statement (the “**Monthly Fee Statement**”) for (a) compensation in the amount of \$57,902.40 for the reasonable and necessary legal services Waller rendered to the Debtor from February 1, 2022 through and including February 28, 2022 (the “**Compensation Period**”) (80% of \$72,378.00) and (b) reimbursement for 100% of the actual and necessary expenses that Waller incurred, in the amount of \$1,169.62 during the Compensation Period.

Services Rendered and Disbursements Incurred

2. Attached as **Exhibit A** is a billing summary of Waller professionals and paraprofessionals by individual, setting forth the (a) name and title of each individual who performed services during the Compensation Period, (b) aggregate time expended by each such individual, (c) hourly billing rate for each such individual, and (d) amount of fees earned by each Waller professional and paraprofessional.

3. Attached as **Exhibit B** is a summary of hours and fees by task code.

4. Attached as **Exhibit C** is a summary of reimbursement sought by expense type for all expenses for the Compensation Period incurred in connection with the performance of professional services.

5. Attached as **Exhibit D** is Waller’s itemized time records of its professionals and paraprofessionals and itemized records of reimbursement sought for the Compensation Period.

Reservations

6. This Monthly Fee Statement includes all the information and supporting detail regarding fees and expenses available to Waller at the time of the filing of this Monthly Fee Statement. If additional information and supporting detail in connection with this Compensation Period should become available, as a result of delays in accounting processing or an inadvertence with respect to time entered in the accounting system, or any other valid reason, Waller reserves the right to make an application to the Court for an allowance of such fees and expenses not included in this Monthly Statement.

Notice

7. Pursuant to the Interim Compensation Order, notice of this Monthly Fee Statement shall be served upon:

- a. the Debtor, the Roman Catholic Diocese of Harrisburg, Attn: Fr. David L. Danneker, 4800 Union Deposit Road, Harrisburg, PA 17111, frddanneker@hbgdiocese.org;
- b. counsel to the Debtor, Waller, Lansden, Dortch & Davis, LLP, Attn: Blake D. Roth, 511 Union Street, Suite 2700, Nashville, TN 37219, blake.roth@wallerlaw.com;
- c. counsel to the Official Committee of Tort Claimants, Stinson, LLP, Attn: Robert T. Kugler and Edwin H. Caldie, 50 South Sixth Street, Suite 2600, Minneapolis, MN 55402, robert.kugler@stinson.com and ed.caldie@stinson.com; and
- d. the Office of the United States Trustee, Attn: Troy Sellars and Gregory Schiller, 228 Walnut Street, Suite 1190, Harrisburg, PA 17101, d.troy.sellars@usdoj.gov and Gregory.b.schiller@usdoj.gov.

WHEREFORE, Waller, in connection with services rendered on behalf of the Debtor, respectfully requests (a) allowance of compensation and reimbursement in the amount of (i) \$57,902.40 for reasonable and necessary professional services rendered (80% of \$72,378.00) and (ii) \$1,169.62 for 100% of actual and necessary costs and expenses incurred during the Compensation Period, for a total of \$59,072.02, and (b) payment of the forgoing sums.

Dated: March 21, 2022
Nashville, Tennessee

Respectfully submitted,

WALLER LANSDEN DORTCH & DAVIS, LLP

/s/Blake D. Roth

Blake D. Roth (State Bar No. 306951)
Tyler N. Layne (admitted *pro hac vice*)
511 Union Street, Suite 2700
Nashville, TN 37219
Telephone: (615) 244-6380
Facsimile: (615) 244-6804
Email: blake.roth@wallerlaw.com
tyler.layne@wallerlaw.com

-and-

KLEINBARD, LLC

Matthew H. Haverstick (State Bar No. 85072)
Joshua J. Voss (State Bar No. 306853)
Three Logan Square
1717 Arch Street, 5th Floor
Philadelphia, Pennsylvania 19103
Telephone: (215) 568-2000
Facsimile: (215) 568-0140
Email: mhaverstick@kleinbard.com
jvoss@kleinbard.com

Attorneys for the Debtor and Debtor In Possession

EXHIBIT A

COMPENSATION BY PROFESSIONAL

| Name | Position/Bar Year/Start Year | Effective Billing Rate | Bill Hours | Billed Amount |
|--------------------|-------------------------------------|-------------------------------|-------------------|----------------------|
| Mace, Gerald | Partner/1985/2000 | — | — | — |
| Hills, Richard | Partner/1996/2014 | — | — | — |
| Gaston, Jon | Partner/2004/2006 | — | — | — |
| Layne, Tyler | Partner/2012/2014 | \$465.00 | 17.2 | \$7,998.00 |
| Bell, Mark | Partner/2010/2010 | — | — | — |
| Roth, Blake | Partner/2009/2012 | \$470.00 | 85.9 | \$40,373.00 |
| Flinn, Aaron | Partner/2004/2010 | — | — | — |
| Yopp, Michael | Partner/1975/2000 | — | — | — |
| Bunge, John | Partner/2013/2016 | — | — | — |
| Ray, Eric | Partner/1998/2020 | \$475.00 | 22.7 | \$10,782.50 |
| Weiss, Morris | Partner/1985/2016 | — | — | — |
| Peebles, Thomas | Of Counsel/1986/1989 | — | — | — |
| Timblin, Dustin | Of Counsel/2012/2012 | — | — | — |
| Atkinson, Evan | Associate/2017/2018 | \$400.00 | 30.1 | \$12,040.00 |
| Henninger, Samuel | Associate/2019/2020 | \$355.00 | 0.5 | \$177.50 |
| Thornton, Hunter | Associate/2019/2019 | — | — | — |
| Stansell, Clayton | Associate/2019/2021 | — | — | — |
| Sands, Lee | Associate/2020/2020 | — | — | — |
| Berny, Hannah | Associate/2021/2021 | — | — | — |
| Cronk, Chris | Paralegal/NA/2000 | — | — | — |
| Freeman, Brooke | Paralegal/NA/2020 | — | — | — |
| Jezisek, Ann Marie | Paralegal/NA/2016 | \$190.00 | 5.3 | \$1,007.00 |
| Ramer, Jeanette L. | Paralegal/NA/1993 | — | — | — |
| Hawks, Angela | Practice Support Specialist/NA/2000 | — | — | — |
| | | Totals | 161.7 | \$72,378.00 |

EXHIBIT B

COMPENSATION BY PROJECT CATEGORY

| | | Hours | Amount |
|-------------|--|--------------|--------------------|
| B100 | Administration | — | — |
| B110 | Case Administration | 3.7 | \$745.00 |
| B120 | Asset Analysis and Recovery | — | — |
| B130 | Asset Disposition | — | — |
| B140 | Relief from Stay/Adequate Projection Proceedings | — | — |
| B150 | Meetings of and Communications with Creditors | — | — |
| B160 | Fee/Employment Applications | 2.5 | \$790.00 |
| B170 | Fee/Employment Objections | — | — |
| B180 | Avoidance Action Analysis | — | — |
| B185 | Assumption/Rejection of Leases and Contracts | — | — |
| B190 | Other Contested Matters | 93.9 | \$42,858.00 |
| B195 | Non-Working Travel | — | — |
| | | | |
| B200 | Operations | — | — |
| B210 | Business Operations | — | — |
| B220 | Employee Benefits/Pensions | — | — |
| B230 | Financing/Cash Collections | — | — |
| B240 | Tax Issues | — | — |
| B250 | Real Estate | — | — |
| B260 | Board of Directors Matters | — | — |
| | | | |
| B300 | Claims and Plan | — | — |
| B310 | Claims Administration and Objections | 16.5 | \$7,509.50 |
| B320 | Plan and Disclosure Statement | 45.1 | \$20,475.50 |
| | | | |
| B400 | Bankruptcy-Related Advice | — | — |
| B410 | General Bankruptcy Advice/Opinions | — | — |
| B420 | Restructurings | — | — |
| | Total | 161.7 | \$72,378.00 |

EXHIBIT C

EXPENSE SUMMARY

| Expense Category | Amount |
|-------------------------|-------------------|
| Conference Calls | \$60.41 |
| Online Research | \$20.21 |
| Postage | — |
| Travel | — |
| Transcripts | \$1,089.00 |
| Total | \$1,169.62 |

EXHIBIT D

TIME DETAIL

WALLER LANSDEN DORTCH & DAVIS, LLP
NASHVILLE CITY CENTER
511 UNION STREET, SUITE 2700
POST OFFICE BOX 198966
NASHVILLE, TENNESSEE 37219-8966
615-244-6380
FEDERAL ID NO. 62-0479474

Roman Catholic Diocese of Harrisburg
Fr. David Danneker, Diocesan Center, Harrisburg/Prince of Peace Parish,
Steelton
PRIVILEGED & CONFIDENTIAL
Via Email:
frddanneker@hbgdiocese.org

March 21, 2022
Invoice 10848361
Page 1
Bill Through 02/28/22
Billing Atty: B. Roth

Our Matter # 036905.08024

Chapter 11 Restructuring

Fees:

B110 Case Administration

| <u>Date</u> | <u>Description</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|---|--------------------|--------------|---------------|
| 02/01/22 | Email to Epiq re: service of filings | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/01/22 | Review docket entry setting hearing on standing motion, and update case calendar re: same | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/01/22 | Emails with court staff re: procedures for demonstrative exhibit for rebuttal only | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/01/22 | Arrange for attorneys to appear telephonically for February 3 hearing | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/02/22 | Finalize and file motion to seal certificate of service and motion for expedited consideration of same | Jezisek, Ann Marie | 0.40 | 76.00 |
| 02/02/22 | Review order extending objection deadline re: late filed claim, and update calendar re: same | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/03/22 | Coordinate filing of redacted certificate of service and emails with Clerk of Court re: same and requesting that prior certificate of service be sealed | Atkinson, Evan J | 0.20 | 80.00 |
| 02/03/22 | Arrange for attorneys to appear telephonically for February 8 hearing | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/03/22 | Review docket entry continuing hearing | Jezisek, Ann Marie | 0.10 | 19.00 |

| | | | | |
|--------------|--|--------------------|-------------|---------------|
| | on standing motion, and calendar new hearing date and related deadlines re: same | | | |
| 02/04/22 | Emails with B. Roth re: requesting transcript of hearing held February 3, 2022 | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/04/22 | Emails with court recorder and transcriptionist re: preparing transcript of hearing held February 3, 2022 | Jezisek, Ann Marie | 0.30 | 57.00 |
| 02/08/22 | Review docket entries re: hearing and objection deadlines re: fee applications, and calendar hearing date and related deadlines re: same | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/09/22 | Arrange for attorneys to appear telephonically for February 15 hearing | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/09/22 | Emails with attorneys re: telephonic appearances for February 15 hearing | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/10/22 | Review orders extending U.S. Trustee's deadline to objection to disclosure statements, and calendar same | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/17/22 | Emails with court staff re: filing event for motion to toll deadlines re: late filed claim | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/17/22 | Emails with Epiq re: service of motion re: late filed claim | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/18/22 | Finalize and file certificates of no objection re: motions to extend deadlines | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/18/22 | Emails with court recorder and transcriber re: expedited transcript of February 9 hearing | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/18/22 | Emails with Epiq re: service of filings | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/21/22 | Review orders extending removal deadline and exclusivity deadlines, and update case calendar re: same | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/22/22 | Emails with Epiq re: service of filings | Jezisek, Ann Marie | 0.10 | 19.00 |
| 02/22/22 | Review order extending objection deadline and resetting hearing on disclosure statements, and calendar new deadlines and hearing date re: same | Jezisek, Ann Marie | 0.20 | 38.00 |
| Total | | | 3.70 | 745.00 |

B160 Fee/Employment Applications

| Date | Description | Timekeeper | Hours | Amount |
|--------------|---|--------------------|--------------|---------------|
| 02/01/22 | Finalize and file fee applications for Debtors' professionals | Jezisek, Ann Marie | 0.40 | 76.00 |
| 02/14/22 | Finalize and file certificates of no objection re: monthly fee statements of Debtor's professionals | Jezisek, Ann Marie | 0.30 | 57.00 |
| 02/21/22 | Prepare monthly fee applications | Atkinson, Evan J | 0.60 | 240.00 |
| 02/22/22 | Prepare monthly fee applications | Atkinson, Evan J | 0.90 | 360.00 |
| 02/22/22 | Finalize and file monthly fee statements | Jezisek, Ann Marie | 0.30 | 57.00 |
| Total | | | 2.50 | 790.00 |

B190 Other Contested Matters

| Date | Description | Timekeeper | Hours | Amount |
|-------------|---|-------------------|--------------|---------------|
| 02/01/22 | Attend hearing/status conference (1.5); search re: [REDACTED] | Atkinson, Evan J | 3.00 | 1,200.00 |

| | | | | |
|----------|---|------------------|------|----------|
| | ██████████ (1.5) | | | |
| 02/01/22 | Participate in status conference re: Committee standing motion | Layne, Tyler N | 1.40 | 651.00 |
| 02/01/22 | Prepare for and attend hearing | Roth, Blake D | 2.90 | 1,363.00 |
| 02/01/22 | Prepare for February 3 hearing on Committee's motion for derivative standing | Roth, Blake D | 2.30 | 1,081.00 |
| 02/02/22 | Review materials in preparation for derivative standing hearing (1.3); prepare motion to seal docket entry and motion to expedite same (0.7); | Atkinson, Evan J | 2.00 | 800.00 |
| 02/02/22 | Review and comment on argument and testimony outlines and demonstratives for hearing on Committee standing motion | Layne, Tyler N | 0.80 | 372.00 |
| 02/02/22 | Prepare for hearing on motion for derivative standing | Roth, Blake D | 8.00 | 3,760.00 |
| 02/03/22 | Attend derivative standing hearing (2.3); telephone call with B. Roth following hearing (0.2) | Atkinson, Evan J | 2.50 | 1,000.00 |
| 02/03/22 | Participate in hearing on Committee standing motion (2.7); calls with B. Roth and E. Ray re: same (.6); email to A. Jezisek re: preparation for continued hearing re: same (.1) | Layne, Tyler N | 3.40 | 1,581.00 |
| 02/03/22 | Prepare for and attend hearing | Roth, Blake D | 5.00 | 2,350.00 |
| 02/04/22 | Review demonstratives in preparation for continued hearing | Layne, Tyler N | 0.10 | 46.50 |
| 02/04/22 | Plan and prepare for February 9 hearing on motion for derivative standing | Roth, Blake D | 2.10 | 987.00 |
| 02/07/22 | Conference call with T. Layne, B. Roth, and E. Ray to discuss ██████████ | Atkinson, Evan J | 0.50 | 200.00 |
| 02/07/22 | Call with B. Roth, E. Ray, and E. Atkinson re: ██████████ | Layne, Tyler N | 0.50 | 232.50 |
| 02/07/22 | Plan and prepare for hearing on motion for derivative standing | Roth, Blake D | 4.00 | 1,880.00 |
| 02/08/22 | Review argument outline for continued hearing on Committee standing motion | Layne, Tyler N | 0.20 | 93.00 |
| 02/08/22 | Plan and prepare for hearing on motion for derivative standing | Roth, Blake D | 3.20 | 1,504.00 |
| 02/08/22 | Communicate with T. Kerwin re: survivor issues | Roth, Blake D | 0.10 | 47.00 |
| 02/09/22 | Attend hearing on derivative standing motion | Atkinson, Evan J | 2.00 | 800.00 |
| 02/09/22 | Emails to E. Atkinson and A. Jezisek re: Committee standing hearing and preparation for continued hearing re: same | Layne, Tyler N | 1.60 | 744.00 |
| 02/09/22 | Prepare for and attend hearing on Committee's motion for derivative standing | Roth, Blake D | 4.40 | 2,068.00 |
| 02/09/22 | Attention to insurance and mediation issues | Roth, Blake D | 1.00 | 470.00 |
| 02/11/22 | Email to B. Roth re: ██████████ | Layne, Tyler N | 0.10 | 46.50 |
| 02/11/22 | Attention to plan and disclosure statement issues | Roth, Blake D | 2.90 | 1,363.00 |
| 02/13/22 | Review and revise Catholic Mutual settlement agreement | Layne, Tyler N | 1.40 | 651.00 |

| | | | | |
|--------------|--|---------------------|--------------|------------------|
| 02/14/22 | Plan and prepare for hearing | Roth, Blake D | 3.00 | 1,410.00 |
| 02/15/22 | Email to internal Waller team re: [REDACTED] | Layne, Tyler N | 0.10 | 46.50 |
| 02/17/22 | Research pleadings re: [REDACTED] | Henninger, Samuel R | 0.20 | 71.00 |
| 02/17/22 | Review opinion re: Committee standing motion (.3); research re: [REDACTED] (.6) | Layne, Tyler N | 0.90 | 418.50 |
| 02/17/22 | Review and analyze court's opinion regarding Committee's derivative standing motion and multiple conversations re: same and impact of same | Roth, Blake D | 2.80 | 1,316.00 |
| 02/18/22 | Research [REDACTED] | Henninger, Samuel R | 0.30 | 106.50 |
| 02/18/22 | Emails to B. Roth and S. Henninger re: [REDACTED] | Layne, Tyler N | 0.30 | 139.50 |
| 02/18/22 | Email to B. Roth re: [REDACTED] | Layne, Tyler N | 0.10 | 46.50 |
| 02/18/22 | Review and analyze adversary complaints and attachments to same | Roth, Blake D | 0.60 | 282.00 |
| 02/18/22 | Call with D. Kaercher | Roth, Blake D | 0.50 | 235.00 |
| 02/18/22 | Review and analyze court opinion and next steps | Roth, Blake D | 2.30 | 1,081.00 |
| 02/19/22 | Email to B. Roth re: [REDACTED] | Layne, Tyler N | 0.10 | 46.50 |
| 02/21/22 | Review and analyze court's ruling and options re: same | Roth, Blake D | 0.60 | 282.00 |
| 02/22/22 | Emails to E. Atkinson re: [REDACTED] | Layne, Tyler N | 0.20 | 93.00 |
| 02/22/22 | Draft motion to alter or amend court's ruling and research re: same | Roth, Blake D | 2.50 | 1,175.00 |
| 02/23/22 | Research case law re: [REDACTED] | Atkinson, Evan J | 1.20 | 480.00 |
| 02/23/22 | Draft motion to alter or amend judgment and research re: same | Roth, Blake D | 4.80 | 2,256.00 |
| 02/24/22 | Draft motion to alter or amend ruling and research re: same | Roth, Blake D | 3.30 | 1,551.00 |
| 02/25/22 | Draft [REDACTED] (1.0); draft [REDACTED] (2.8) | Atkinson, Evan J | 3.80 | 1,520.00 |
| 02/25/22 | Draft motion to alter or amend judgment and research re: same | Roth, Blake D | 5.40 | 2,538.00 |
| 02/28/22 | Review and revise motion to amend derivative standing order and emails with B. Roth re: same | Atkinson, Evan J | 1.50 | 600.00 |
| 02/28/22 | Review and revise 9023 motion | Layne, Tyler N | 1.30 | 604.50 |
| 02/28/22 | Review and revise motion to alter or amend judgment and multiple communications with T. Layne, E. Atkinson, E. Ray, and D. Kaercher re: same | Roth, Blake D | 2.70 | 1,269.00 |
| Total | | | 93.90 | 42,858.00 |

B310 Claims Administration and Objections

| <u>Date</u> | <u>Description</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------------------------|-------------------|--------------|---------------|
| 02/01/22 | Review response to claim objections | Layne, Tyler N | 0.10 | 46.50 |
| 02/02/22 | Review reply in support of claim | Layne, Tyler N | 0.10 | 46.50 |

| | | | | |
|----------|--|--------------------|------|----------|
| | objections | | | |
| 02/02/22 | Review and comment upon argument outlines for hearing on committee's standing motion | Ray, Eric T | 0.60 | 285.00 |
| 02/02/22 | Call with carriers re: omnibus hearing on claim objections | Roth, Blake D | 0.60 | 282.00 |
| 02/03/22 | Prepare motion and agreed order reclassifying POC 10014 as a Class 5 Claim | Atkinson, Evan J | 0.30 | 120.00 |
| 02/03/22 | Review responses to claim objections | Layne, Tyler N | 0.20 | 93.00 |
| 02/03/22 | Attend hearing on Committee's standing motion | Ray, Eric T | 2.60 | 1,235.00 |
| 02/03/22 | Follow up email correspondences and telephone conferences with B. Roth and T. Layne re: [REDACTED] | Ray, Eric T | 0.30 | 142.50 |
| 02/03/22 | Attention to status of claim objections | Roth, Blake D | 0.90 | 423.00 |
| 02/04/22 | Finalize and file motion for entry of agreed order re: classifying claim | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/04/22 | Emails with court staff re: motion for entry of agreed order re: classifying claim | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/04/22 | Review motion to classify claim | Layne, Tyler N | 0.10 | 46.50 |
| 02/08/22 | Review and provide comments on argument to hearing on standing | Ray, Eric T | 0.30 | 142.50 |
| 02/09/22 | Emails with Cold Stone Granite re: withdrawal of their proofs of claim | Atkinson, Evan J | 0.30 | 120.00 |
| 02/09/22 | Review response to claim objection | Layne, Tyler N | 0.10 | 46.50 |
| 02/10/22 | Review response to claim objection and reply in support of claim objection | Layne, Tyler N | 0.20 | 93.00 |
| 02/10/22 | Multiple communications re: claim objections and status of same | Roth, Blake D | 1.00 | 470.00 |
| 02/11/22 | Review Committee response to claim objections | Layne, Tyler N | 0.10 | 46.50 |
| 02/14/22 | Review responses to claim objections | Layne, Tyler N | 0.20 | 93.00 |
| 02/14/22 | Review and revise motion for omnibus hearing on claim objections | Roth, Blake D | 0.20 | 94.00 |
| 02/15/22 | Review replies in support of claim objections | Layne, Tyler N | 0.20 | 93.00 |
| 02/15/22 | Communicate with R. Serbin | Roth, Blake D | 0.30 | 141.00 |
| 02/16/22 | Review response to claim objection | Layne, Tyler N | 0.10 | 46.50 |
| 02/16/22 | Multiple communications re: claims and claim objections | Roth, Blake D | 1.60 | 752.00 |
| 02/17/22 | Finalize and file motion to toll deadlines re: late filed claim | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/17/22 | Review claim objection-related pleadings | Layne, Tyler N | 0.20 | 93.00 |
| 02/17/22 | Numerous internal electronic mail correspondences with Waller team re: [REDACTED] | Ray, Eric T | 0.60 | 285.00 |
| 02/17/22 | Attention to various claim objections and responses to same | Roth, Blake D | 0.40 | 188.00 |
| 02/18/22 | Draft motion agreed order to disallow claims | Atkinson, Evan J | 0.70 | 280.00 |
| 02/18/22 | Review claim objection-related pleadings | Layne, Tyler N | 0.20 | 93.00 |
| 02/23/22 | Review Committee's omnibus response to Debtor's claim objections | Roth, Blake D | 0.10 | 47.00 |
| 02/23/22 | Multiple communications re: omnibus claim procedures and related issues | Roth, Blake D | 0.60 | 282.00 |

| | | | | |
|--------------|---|----------------|--------------|-----------------|
| 02/24/22 | Multiple communications with carriers regarding claim objections | Roth, Blake D | 0.60 | 282.00 |
| 02/25/22 | Review responses to debtor claim objections (.5); review reply in support of insurer claim objections (.1); review motion to seal claim objections (.2) | Layne, Tyler N | 0.80 | 372.00 |
| 02/25/22 | Communicate with carriers re: motions regarding hearing and procedures for claim objections | Roth, Blake D | 0.20 | 94.00 |
| 02/28/22 | Review motion re: omnibus hearings related to abuse claim objections | Layne, Tyler N | 0.10 | 46.50 |
| 02/28/22 | Review draft of, and provide comment to, motion to alter or amend order on derivative standing motion filed by Committee | Ray, Eric T | 0.70 | 332.50 |
| 02/28/22 | Multiple internal email correspondences with debtor team re: [REDACTED] | Ray, Eric T | 0.30 | 142.50 |
| Total | | | 16.50 | 7,509.50 |

B320 Plan and Disclosure Statement

| <u>Date</u> | <u>Description</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|--|-------------------|--------------|---------------|
| 02/01/22 | Call with E. Atkinson re: [REDACTED] | Layne, Tyler N | 0.10 | 46.50 |
| 02/01/22 | Continued work on argument section of objection to Committee's disclosure statement | Ray, Eric T | 1.90 | 902.50 |
| 02/01/22 | Call with Judge Hogan | Roth, Blake D | 0.50 | 235.00 |
| 02/03/22 | Emails to B. Roth re: [REDACTED] | Layne, Tyler N | 0.20 | 93.00 |
| 02/04/22 | Prepare confirmation brief | Atkinson, Evan J | 3.80 | 1,520.00 |
| 02/04/22 | Attention to plan issues | Roth, Blake D | 1.20 | 564.00 |
| 02/07/22 | Emails to Safety National's counsel and B. Roth re: additional language for plan related to workers' compensation insurance (.3); review UST motions to extend time to respond to disclosure statements (.2) | Layne, Tyler N | 0.50 | 232.50 |
| 02/08/22 | Further research into [REDACTED] | Ray, Eric T | 2.10 | 997.50 |
| 02/08/22 | Continued drafting [REDACTED] | Ray, Eric T | 4.60 | 2,185.00 |
| 02/09/22 | Continued work on [REDACTED] | Ray, Eric T | 2.30 | 1,092.50 |
| 02/09/22 | Call with D. Kaercher re: plan [REDACTED] | Roth, Blake D | 0.50 | 235.00 |
| 02/10/22 | Continue drafting confirmation brief | Atkinson, Evan J | 1.40 | 560.00 |
| 02/10/22 | Review of issues re: [REDACTED] | Layne, Tyler N | 1.20 | 558.00 |
| 02/10/22 | Multiple communications re: [REDACTED] | Roth, Blake D | 2.00 | 940.00 |
| 02/14/22 | Continue drafting confirmation brief | Atkinson, Evan J | 0.30 | 120.00 |
| 02/14/22 | Review Catholic Mutual settlement agreement | Roth, Blake D | 0.40 | 188.00 |
| 02/15/22 | Work on plan and disclosure statement issues and revisions to same | Roth, Blake D | 3.30 | 1,551.00 |
| 02/16/22 | Continue drafting confirmation brief | Atkinson, Evan J | 0.60 | 240.00 |
| 02/16/22 | Thorough review of draft objection to disclosure statement proposed by | Ray, Eric T | 1.20 | 570.00 |

| | | | | |
|---|--|--------------------|---------------|------------------|
| 02/16/22 | insurers Analyze [REDACTED] | Ray, Eric T | 0.60 | 285.00 |
| 02/16/22 | [REDACTED] Multiple communications re: plan and disclosure statement issues and attention to same | Roth, Blake D | 3.00 | 1,410.00 |
| 02/17/22 | Review court order granting derivative standing (1.4); research re: [REDACTED] (1.0); research re: [REDACTED] (0.7); draft agreed motion to extend disclosure statement objection deadline and coordinate filing of same (0.5) | Atkinson, Evan J | 3.60 | 1,440.00 |
| 02/17/22 | Receipt and review of B. Roth's proposed edits to [REDACTED] | Ray, Eric T | 0.60 | 285.00 |
| 02/17/22 | Receipt and review of court's order on committee's motion for derivative standing | Ray, Eric T | 1.80 | 855.00 |
| 02/17/22 | Initial preparation of edits to [REDACTED] [REDACTED] [REDACTED] | Ray, Eric T | 2.20 | 1,045.00 |
| 02/17/22 | Draft [REDACTED] | Roth, Blake D | 3.00 | 1,410.00 |
| 02/18/22 | Review [REDACTED] | Atkinson, Evan J | 0.90 | 360.00 |
| 02/18/22 | Finalize and file motion extending deadlines to object to disclosure statements | Jezisek, Ann Marie | 0.20 | 38.00 |
| 02/24/22 | Call with United States Trustee re: plan and disclosure statement | Roth, Blake D | 1.10 | 517.00 |
| Total | | | 45.10 | 20,475.50 |
| Total Fees for Professional Services | | | 161.70 | 72,378.00 |

Time Summary

| <u>Timekeeper</u> | <u>Position</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|---------------------|-----------------|---------------|-------------|------------------|
| Layne, Tyler N | Partner | 17.20 | 465.00 | 7,998.00 |
| Ray, Eric T | Partner | 22.70 | 475.00 | 10,782.50 |
| Roth, Blake D | Partner | 85.90 | 470.00 | 40,373.00 |
| Atkinson, Evan J | Associate | 30.10 | 400.00 | 12,040.00 |
| Henninger, Samuel R | Associate | 0.50 | 355.00 | 177.50 |
| Jezisek, Ann Marie | Paralegal | 5.30 | 190.00 | 1,007.00 |
| Totals | | 161.70 | | 72,378.00 |

Task Summary

| <u>Task</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|--------------------------------------|--------------|---------------|
| B110 | Case Administration | 3.70 | 745.00 |
| B160 | Fee/Employment Applications | 2.50 | 790.00 |
| B190 | Other Contested Matters | 93.90 | 42,858.00 |
| B310 | Claims Administration and Objections | 16.50 | 7,509.50 |

| | | | |
|------|-------------------------------|---------------|------------------|
| B320 | Plan and Disclosure Statement | 45.10 | 20,475.50 |
| | Totals | 161.70 | 72,378.00 |

Disbursements:

| <u>Date</u> | <u>Description</u> | <u>Amount</u> |
|-------------|--|-----------------|
| 01/04/22 | Conference Call :Conference Call: 7 participants by: Tyler Layne @ 13:59PM | 29.74 |
| 01/04/22 | Conference Call :Conference Call: 5 participants by: Tyler Layne @ 09:59AM | 20.84 |
| 01/19/22 | Conference Call :Conference Call: 3 participants by: Blake Roth @ 13:24PM | 9.83 |
| 02/04/22 | VENDOR: Transcripts Plus, Inc. INVOICE#: 020422 DATE: 2/4/2022 Expedited transcript of February 3 hearing | 641.30 |
| 02/18/22 | VENDOR: Transcripts Plus, Inc. INVOICE#: 021822 DATE: 2/18/2022 estimated cost of transcript of February 9 hearing | 447.70 |
| 02/28/22 | Lexis Online Research on 02/28/2022 by Tyler Layne | 9.89 |
| 02/28/22 | Lexis Online Research on 02/28/2022 by Tyler Layne | 10.32 |
| | Total Disbursements: | 1,169.62 |

Disbursement Summary

| | |
|-------------------|----------|
| Client Charges | 1,089.00 |
| Conference Call | 60.41 |
| Online Researches | 20.21 |

| | |
|----------------------------|-----------------|
| Total Disbursements | 1,169.62 |
|----------------------------|-----------------|

| | |
|--|--------------|
| Total Fees and Disbursements on This Invoice | \$ 73,547.62 |
|--|--------------|

| | |
|-------------------------------|--------------|
| PLEASE REMIT TOTAL AMOUNT DUE | \$ 73,547.62 |
|-------------------------------|--------------|

New Lockbox Address and Remittance Instructions – Action Required

We have a new lockbox location for your remittances available immediately. It is important that you use this new address to avoid delays in processing your payments. We will be accepting checks with remittance documentation at our lockbox facility. Additionally, you may pay via ACH or wire, and you'll find payment instructions for all options below.

NEW LOCKBOX ADDRESS:

MSC 7594
Waller Lansden Dortch & Davis, LLP
PO Box 415000
Nashville, TN 37241-7594

ACH Payment Instructions:

Beneficiary Bank: Regions Bank

Bank Address: 150 4th Avenue North
Nashville, TN 37219
1-800-843-1158

ABA Number: 064000017
Beneficiary Acct Number: 0001920307
Beneficiary Acct Name: Waller Lansden Dortch & Davis General Account

Please send remittance advice to: ARDept@wallerlaw.com

If you prefer to pay via wire transfer, the instructions are:

Wire Instructions:

Beneficiary Bank: Regions Bank

Bank Address: 150 4th Avenue North
Nashville, TN 37219
1-800-843-1158

ABA Number: 062005690
Beneficiary Acct Number: 0001920307
Beneficiary Acct Name: Waller Lansden Dortch & Davis General Account
SWIFT Code: UPNBUS 44

Please send remittance advice to: ARDept@wallerlaw.com

Thank you for your prompt attention to this matter.