

In re:)	
)	Chapter 11
BOLTA US LTD., ¹)	
)	Case No. 23-70042
Debtor.)	
)	
)	Chief Judge Jennifer Henderson
)	

Name of Applicant:	MAPLES LAW FIRM, PC	
Applicant's Role in Case:	Counsel for Unsecured Creditors Committee	
Date Order of Employment Signed:	February 16, 2023 [Docket No. 218]	
	Beginning of Period:	End of Period
Time period covered by this Statement:	February 1, 2023	February 28, 2023
Summary of Total Fees and Expenses Requested		
Total fees requested for payment in this Statement:	\$36293.20 (80% of \$45366.50)	
Total expenses requested for payment in this Statement:	\$0.00	
Total fees and expenses requested for payment in this Statement (excluding the 20% Holdback):	\$36293.20	
Total fees and expenses for the period covered by this Statement (includes the 20% Holdback):	\$45366.50	
Summary of <u>Attorney</u> Fees for the Period Covered by This Statement		
Attorney fees:	\$40540.50	
Actual attorney hours:	81.90	
Average hourly rate for attorneys:	\$495.00	
Summary of <u>Paraprofessional</u> Fees for the Period Covered by This Statement		
Paraprofessional fees:	\$4826.00	
Actual paraprofessional hours:	21.00	
Average hourly rate for paraprofessionals:	\$172.50	

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In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 229], each party receiving notice of the monthly fee statement will have until 21 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 21-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

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”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, Docket No. 229 (the “Fee Procedures Order”), Maples Law Firm, PC (“Firm”), as Counsel to the Unsecured Creditors Committee, hereby files its *Second Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses for the Period from February 1, 2023 through February 28, 2023* (“Monthly Fee Statement”).

1. By this Monthly Fee Statement, and pursuant to the Fee Procedures Order, Maples Law Firm, PC seeks interim payment of \$36,293.20 (80% of \$45,366.50) as compensation for professional services rendered to the Debtor during the period from February 1, 2023, through February 28, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$0.00, for a total amount of \$36,293.20 to be paid upon expiration of the objection deadline.

2. In support of the Monthly Fee Statement, Maples Law Firm, PC submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Unsecured Creditors Committee for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Unsecured Creditors Committee for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall follow the procedures outlined for objections as set forth in Paragraph 2 of the Fee Procedures Order.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Maples Law Firm, PC reserves the right to make further application to the Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: March 23, 2023

/s/ Stuart M Maples, Esq.

Maples Law Firm, PC

200 Clinton Ave. West, Ste 1000

Huntsville, AL 35801

Telephone: 256-489-9779

Email: smaples@mapleslawfirmpc.com

Counsel for the Unsecured Creditors Committee

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served via the method indicated below on March 23, 2023.

Notice Parties – via email

All parties requesting service through ECF – via email

Via U.S. Mail:

Attn: Jeffrey Truitt
Bolta US Ltd.
1650 Boone Blvd.
Northport, AL 35476

/s/ Stuart M. Maples

Stuart M. Maples

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
None	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
TOTAL	\$

EXHIBIT B

**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

	DESCRIPTION	LEGAL FEES	EXPENSES	TOTAL
#1	Avoidance Claim Analysis	\$		
#2	Lease Analysis	\$		
#3	Other Claim Analysis	\$612.50		\$612.50
#4	Secured Claim Analysis	\$9776.00		\$9776.00
#5	Case Administration	\$6566.50		\$6566.50
#6	General Business/Operations	\$1311.00		\$1311.00
#7	Professional Retention and Fee Application	\$3560.50		\$3560.50
#8	DIP Financing/Cash Collateral	\$20473.25		\$20473.25
#9	Unexpired Leases/Executory Contracts	\$0.00		\$0.00
#10	Claims Resolution	\$0.00		\$0.00
#11	Asset Sales	\$1781.50		\$1781.50
#12	Landlord Issues	544.50		\$544.50
#13	Debtor/Creditor Communication	\$0.00		\$0.00
#14	Creditor Committee Meetings and Communications	\$740.75		\$740.75
#15	Travel	0.00		0.00
#16	Asset Analysis and Recovery	0.00		0.00
	Totals	\$45366.50	\$0.00	\$45366.50

Total Fees for Fee Period	\$45366.50
20% Fee Holdback for Fee Period	\$9072.30
80% of Fees Amount for Fee Period	\$36293.20
Expenses for Fee Period	\$0.00
TOTAL REQUEST	<u>\$36293.20</u>

EXHIBIT C

DETAILED RECORD OF FEES FOR THE FEE PERIOD

[TIME DETAIL (I.E., INVOICES)]

Maples Law Firm, PC
200 Clinton Avenue West, Suite 1000
Huntsville, Alabama 35801
256.489.9779
Tax ID No. 26-2476092
STATEMENT FOR SERVICES RENDERED

Bolta

Page: 1
03/08/2023
Account No: 1141-000M
Statement No: 116447

Fees

			Hours	
02/01/2023	SM	Saved Proof of Claims to master file; input Proof of Claims information into claims analysis-excel	1.00	100.00
	SMM	Telephone conference with committee (weekly update)	0.75	371.25
	SMM	Review draft DIP order	2.50	1,237.50
	KP	Receive and review POC filed by Landstar Ranger; save to file	0.10	24.50
	KP	Update Claims Analysis to include POC filed by Landstar Ranger	0.10	24.50
	KP	Receive and review all daily email exchanges and save to master files	0.10	24.50
	KP	Create an Unsecured Creditors Committee Microsoft TEAMS document portal and upload various documents	0.30	73.50
	KP	Receive and review Application to Employ Hilco and Supplement and Motion for Entry of and Order (I) Approving Debtors (A) Key Employee Incentive Program And Key Employee Retention Plan And (B) Authorizing Payments Under The Same; And (II) Granting Related Relief; save to file	0.10	24.50
02/02/2023	SMM	Worked on comments to draft bid procedures order	2.70	1,336.50
	SMM	Review Deutsche leasing documents and UCC search documents	5.30	2,623.50
	KP	Receive and review Order and Notice of Hearing on Application to Employ, Motion filed by Debtor Bolta US Ltd, Notice of Continued on Limited Objection to Motion of Debtor for an Order to Obtain Post-Petition Financing and Use Cash Collateral and Related Relief Filed by ICICI Bank UK, PLC; save to file; calendar hearing dates	0.20	49.00
	KP	Receive and review Proof of Claim filed by Synergi Partners	0.10	24.50
	KP	Update Claims Analysis to include POC filed by Synergi Partners	0.10	24.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
	KP	Receive and review Proof of Claim filed by ABC Employment Holdings and Northwest Supply Company; save to file	0.10	24.50
02/03/2023	SMM	Review cash flow analysis	2.50	1,237.50
	KP	Receive and review Proof of Claim filed by ABC		

			Hours	
		Employment Holdings and Northwest Supply Company; save to file	0.10	24.50
	KP	Update Claims Analysis to include POCs filed by ABC Employment Holdings and Northwest Supply Company	0.10	24.50
	KP	Receive and review all daily email exchanges and draft documents attached; save to master files	0.20	49.00
	KP	Receive and review Motion to Shorten Time Bolta Us Ltd's Motion To Shorten Time For Icici Bank Uk, Plc To Respond To Discovery; save to file	0.10	24.50
	KP	Update UCC Teams Portal with weekly meeting notes and recently filed pleadings	0.10	24.50
02/05/2023	SMM	Review draft DIP order	2.00	990.00
02/06/2023	SM	Email exchange with Mike from BK court to receive First Day Motions audio recording	0.30	30.00
	SMM	Telephone call to Allerdig re bid procedures	0.10	49.50
	SMM	Prepare for hearing; attend hearing via phone	3.00	1,485.00
	KP	Identify, gather and organize documents and pleadings pertinent to 2/6 hearing	0.20	49.00
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
	KP	Draft Unsecured Creditors Committee's Objection to Debtor's Entry of Final DIP Order	4.20	1,029.00
	KP	Receive, review and offload SMP's document production; organize and save to file	0.40	98.00
	KP	Receive and review POC filed by Nicro Bolta N.A., Bischof +Klein SE & Co. and Southland International Trucks; save to file	0.10	24.50
	KP	Update Claims Analysis with POCs filed by Nicro Bolta N.A., Bischof +Klein SE & Co. and Southland International Trucks	0.10	24.50
	KP	Receive and review Notice of Hearing on Motion to Shorten Time, Response to Motion to Shorten Time, Order Withdrawing Motion to Shorten Time, Notice of Court Hearing Audios; save to file and calendar hearing date	0.10	24.50
	SMM	Telephone call to debtor's counsel regarding DIP loan	1.20	594.00
	SMM	Review cash DIP loan	1.75	866.25
02/07/2023	SM	Phone call/email exchange with Mike in BK court to receive other half of audio for First Day Motions hearing	0.30	30.00
	SMM	Worked on final draft DIP order; telephone call to debtor's and lender's counsel on bid procedures	4.10	2,029.50
	KP	Review all daily email exchanges and draft documents attached; save to master file	0.10	24.50
	KP	Continue drafting Objection to Final DIP Order	1.30	318.50
	KP	Receive and review POC filed by Quill/Tom Riggelman, Notice of Court Hearing Audio, varies Position Statements filed by the Bankruptcy Administrator; Notices of hearings on BA's varies Position Statements; save to file; calendar hearings	0.30	73.50
	KP	Update Claims Analysis to include POC filed by Quill/Tom Riggelman	0.10	24.50
02/08/2023	SM	Set up a conference call with the committee for 2/9/23	0.20	20.00

			Hours	
	SMM	Worked on DIP financing and bid procedures; preparation of objections	3.70	1,831.50
	KP	Draft Amended Application to Approve Employment of Maples Law Firm as Counsel for UCC; finalize and efile same	0.20	49.00
	KP	Draft proposed order Approving Application to Employ Maples Law Firm as Counsel for UCC; forward same to R. Webber for review and approval	0.40	98.00
	KP	Receive and review all daily email exchanges and draft documents attached; save to master files	0.10	24.50
	KP	Continue drafting Objection to Final DIP Order	1.10	269.50
	KP	Receive and review Supplement to Application to Employ Rosen Harwood; save to file	0.10	24.50
02/09/2023	SMM	Attend SMP deposition via telephone	3.30	1,633.50
	SMM	Worked on objection to DIP financing	1.60	792.00
	KP	Revise Objection to Final DIP Order	0.50	122.50
	KP	Receive and review Proof of Claim filed by V-Line Europe	0.10	24.50
	KP	Update Claims analysis to include POC V-Line Europe	0.10	24.50
	KP	Receive and review Stipulated Order Amended Deadline in the Order Granting the Debtor Additional Time to File Schedules	0.10	24.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
02/10/2023	SMM	Continued work on objection to DIP financing	1.70	841.50
	KP	Receive and review all daily email exchanges and draft documents attached; save to master files	0.20	49.00
	KP	Continue revising Objection to DIP Order	0.40	98.00
	KP	Receive and review Amendment by certain parties to Final Order (I) Authorizing Debtor To Obtain Secured Postpetition Financing, Motion For An Order To Limit Notice And Establish Notice Procedures, and Motion to Shorten Time to Hear Motion For An Order To Limit Notice; save to file	0.20	49.00
02/13/2023	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
	KP	Finalize UCCs Objection to Final DIP Order and efile same	0.10	24.50
	KP	Receive and review Motion to Appoint Examiner, various Hearing Notices on filed Motions; save to file and calendar hearing dates	0.20	49.00
	KP	Receive and review POCs filed by TForce Freight and American CRS Equipment; save to file TForce Freight and American CRS Equipment	0.10	24.50
	KP	Update Claims Analysis to include POCs filed by	0.10	24.50
02/14/2023	SMM	Prepare for hearings on 2/15	3.30	1,633.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
	KP	Receive and review Objection to Motion to Sell Property, Statement of Volkswagen, Motion In Camera, Order Granting Motion to File Under Seal and Notices of Hearings; save to file and calendar hearing dates	0.20	49.00

			Hours	
02/15/2023	SMM	Attend 341 meeting; review schedules; prepare for 341 meeting	3.20	1,584.00
	SMM	Prepare for hearing; attend hearing; travel to and from hearing	5.40	2,673.00
	KP	Receive and review Agenda For Hearing Scheduled For February 15, 2023; save to file	0.10	24.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
	KP	Update UCC Microsoft TEAMS portal with weekly meeting notes and current pleadings	0.10	24.50
02/16/2023	SMM	Review proposed retention orders	3.20	1,584.00
	KP	Receive and review Order Approving Employment of Maples Law Firm PC, Notices of Hearing Audio; Order Granting Application to Employ McDonald Hopkins, and Order Granting Application to Employ Rosen Harwood; save to file	0.10	24.50
	KP	Receive and review POC filed by Robert Half Finance; save to file	0.10	24.50
	KP	Update Claims Analysis to include POC filed by Robert Half Finance	0.10	24.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
02/17/2023	SMM	Review schedules and work on document requests	2.60	1,287.00
	SMM	Review retention orders	0.70	346.50
	KP	Receive and review Order Granting Debtor's Motion to Limit Notice and Establish Notice Procedures, Order Establishing Procedures for Interim Compensation, Order Authorizing the Debtor to Retain, Employ, and Compensate Certain Professionals, and Order (I) Approving the Retention of Epiq Corporate Restructuring, LLC; save to file	0.20	49.00
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
02/20/2023	SMM	Review Reilly retention order	0.50	247.50
	SMM	Review ICICI loan documents	2.60	1,287.00
	SMM	Draft consent to employee order and appraiser order	0.50	247.50
	KP	Receive and review ORDER Approving Bidding Procedures; etc.; calendar deadlines; save to file	0.20	49.00
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
	KP	Draft Consent Motion by the Official Committee of Unsecured Creditors to Debtor's Motions [docket no. 157 & 159]; efile same	0.20	49.00
02/21/2023	SMM	Telephone conference with Gross; worked on fee issues	1.10	544.50
	KP	Receive and review Revised Order Approving Bidding Procedures, Notice to Creditors of Auction and Sale, Order on Debtor's Motion for Order Approving Terms of Engagement Letter with B. Riley Advisory Services, and Order Authorizing the Employment and Retention of Donnelly Penman; save to file	0.10	24.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50

			Hours	
02/22/2023	SMM	Meeting with committee	0.40	198.00
	SMM	Review data room information	1.80	891.00
	SMM	Telephone call to Gross and investment banker and CRO	1.60	792.00
	SMM	Review ICICI proposed order	0.60	297.00
	SM	Set up SMM meeting with Jeff, Roy and Steve Gross	0.20	20.00
	KP	Receive and review Letter Filed by Tedrow & Myers Immigration Law Group; save to file	0.10	24.50
	KP	Receive and review POC filed by IRS; save to file	0.10	24.50
	KP	Update Claims Analysis to include POC filed by IRS	0.10	24.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
	KP	Receive notice of Intralinks documents available for download; access, offload and organize Project Star documents	0.80	196.00
	KP	Update UCC Microsoft TEAMS portal with weekly meeting notes and current pleadings	0.10	24.50
	KP	Update UCC Microsoft TEAMS portal with weekly meeting notes and current pleadings	0.10	24.50
02/23/2023	SMM	Telephone call to Steve Gross re ICICI claim	0.40	198.00
	SMM	Review fixture filing research	2.20	1,089.00
	SM	Requested dial in information for SMM for hearing on 2/24/23	0.20	20.00
	KP	Receive and review Amended Objection to Motion Regarding Chapter 11 First Day Motions filed by ICICI, Amended Objection to Motion to Sell Property Free and Clear of Liens filed by ICICI; save to file	0.10	24.50
	KP	Receive and review POC filed by Wells Fargo; save to file	0.10	24.50
	KP	Update Claims Analysis to include POC filed by Wells Fargo	0.10	24.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
02/24/2023	SMM	Review ICICI's secured position	4.70	2,326.50
	SMM	Prepare for employee incentives hearing; attend hearing	3.20	1,584.00
	SMM	Email traffic and telephone call from John Allarding regarding ICICI lien claim	1.20	594.00
	SMM	Review Hilco order	0.30	148.50
	KP	Receive and review Notice of Hearing on Motion to Sell Property, Order Authorizing the Employment of Hilco Valuation Services, Report to Court Notice of McDonald Hopkins LLC's First Monthly First Monthly Fee Statement, Notice of Hearing re Assumption and Assignments of Leases and Contracts; save to file; calendar hearing dates	0.20	49.00
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
02/27/2023	SMM	Review ICICI lien attachments; worked on settlement of ICICI allowed secured claim and credit bid rights	3.30	1,633.50
	SMM	Review Hilco order	0.20	99.00
	SMM	Review Keip and Kerp order	0.50	247.50
	KP	Receive and review Order Approving Debtor's Key Employee Incentive Program, and Notice of Appearance and Request for Notice by Ryan David Thompson Filed		

			Hours	
		by Creditor Bolta Investment; save to file	0.10	24.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
	KP	Create a compare document to distinguish edits made to the multiple versions of the Agreed Order Determining Validity, Extent, and Priority of Lien, etc.	0.10	24.50
	KP	Receive notice of Intralinks documents available for download; access, offload and organize Project Star documents	0.20	49.00
02/28/2023	SMM	Worked on ICICI credit bid issues	0.80	396.00
	SMM	Review landlord issues	1.10	544.50
	SMM	Telephone call to Debtor's counsel regarding liquidating plan	0.30	148.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
	KP	Receive and review Chapter 11 Monthly Operating Report for January 31, 2023; save to file	0.10	24.50
	KP	Receive and review all daily email exchanges, draft documents attached; save to master files	0.10	24.50
	KP	Receive notice of Intralinks documents available for download; access, offload and organize Project Star documents	0.80	196.00
		For Current Services Rendered	102.90	45,366.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Stuart M. Maples	81.90	\$495.00	\$40,540.50
Samantha Marks	2.20	100.00	220.00
Kristin Pickett	18.80	245.00	4,606.00

Total Current Work 45,366.50

Previous Balance \$18,727.75

TOTAL AMOUNT DUE \$64,094.25

Aged Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
64,094.25	0.00	0.00	0.00	0.00	0.00

Billing History

<u>Fees</u>	<u>Expenses</u>	<u>Finance Charge</u>	<u>Payments</u>
64,094.25	0.00	0.00	0.00

PAYMENT DUE UPON RECEIPT