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Hearing Date: February 28, 2024 at 9:00 a.m. (prevailing Eastern Time) Objection Deadline: February 21, 2024 at 4:00 p.m. (prevailing Eastern Time)

#### UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

INVERSIONES LATIN AMERICA POWER LTDA., *et al.*,<sup>1</sup>

Case No. 23-11891 (JPM)

(Jointly Administered)

Debtors.

#### FINAL APPLICATION OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE CHAPTER 11 DEBTORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM NOVEMBER 30, 2023 THROUGH JANUARY 12, 2024

Name of Applicant: ALIXPARTNERS, LLP			
Applicant's Role in Case:	Financial Advisor to the Chapter 11 Debtors		
Date Retention Order Entered:	January 3, 2024 [Docket No. 90]		
Time period servered by this Application.	Beginning of Period	End of Period	
Time period covered by this Application:	November 30, 2023	January 12, 2024	
Total fees requested for the Final Period:	\$207,913.00		
Total expenses requested in this Application:	\$2,694.73		
otal fees and expenses requested in this splication:			
Blended hourly rate for fees incurred during the Final Period:	\$791.15		

<sup>&</sup>lt;sup>1</sup> The Debtors, together with each Debtor's Chilean identification number, are: Inversiones Latin America Power Ltda. (76.299.635-9); San Juan S.A. (76.319.883-9); and Norvind S.A. (76.919.070-8). The location of the corporate headquarters and the service address for Inversiones Latin America Power Ltda. is Cerro El Plomo 5680, Oficina 1202, Las Condes, Santiago, Chile.

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Summary of Prior Payments & Outstanding Amount Due AlixPartners During the Final Period					
Total allowed compensation paid to date:\$0.00					
Total allowed expenses paid to date:	\$0.00				
Total amount of compensation of fees and expenses due & owing to AlixPartners:	\$210,607.73				
This is a(n): Monthly Application Interim Application Final Application					

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#### ALIXPARTNERS, LLP

### SUMMARY OF HOURS AND FEES BY PROFESSIONAL

Professional	Title	Rate	Hours		Fees
John Castellano	Partner & Managing Director	\$1,400/\$1,495	12.5	\$	18,497.50
Robb C McWilliams	Partner & Managing Director	\$1,220/\$1,380	11.6		14,520.00
Elizabeth S Kardos	Partner	\$800	4.7		3,760.00
Christopher Sanchez Montes de Oca	Senior Vice President	\$880/\$1,025	48.5		43,898.00
Hart Ku	Senior Vice President	\$805	38.3		30,831.50
Kaitlyn A Sundt	Senior Vice President	\$585/\$650	7.0		4,121.00
Alberto de la Barra	Vice President	\$715/\$770	120.8		87,780.00
Brooke Filler	Vice President/Senior Vice President	\$510	6.0		3,060.00
Lisa Marie Bonito	Vice President	\$500	0.2		100.00
Lauren Prohaska	Vice President	\$475	13.2		6,270.00
Total Hours and Fees for Professionals 262.3					212,838.00
Less 50% Travel Fees					(4,925.00)
Tot	al Fees for Professionals			\$	207,913.00

Average Billing Rate \$ 791.15

<sup>&</sup>lt;sup>1</sup> AlixPartners' standard hourly rates are reviewed semi-annually and certain professionals' rates were adjusted as of January 1, 2024. Adjustments included reasonable, routine, across-the-board rate increases to reflect promotions and general market increases comparable to market rates of comparable firms performing similar services.

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### ALIXPARTNERS, LLP

### SUMMARY OF HOURS AND FEES BY MATTER CATEGORY

Code	Matter Category	Hours	Fees
1.1	Chapter 11 Process / Case Management	25.5	\$ 23,079.50
1.3	Cash / Liquidity Matters	144.5	111,817.00
1.4	Communication & Meetings with Interested Parties	3.0	2,569.50
1.5	U.S. Trustee / Court Reporting Requirements	21.7	17,124.00
1.9	Plan & Disclosure Statement	0.7	854.00
1.10	Transaction Support	6.2	6,658.00
1.11	Business Operations	0.8	638.00
1.12	Testimony	0.5	440.00
1.13	Vendor Management	12.0	10,131.50
1.14	Executory Contracts	1.3	1,046.50
1.17	Preparation for / Attend Court Hearings	7.2	8,845.00
1.19	Retention Applications & Relationship Disclosures	32.4	19,785.00
1.31	Travel Time	7.0	4,925.00
	Total Hours and Fees by Matter Category	262.8	\$ 207,913.00

Average Billing Rate \$ 791.15

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### ALIXPARTNERS, LLP

### **SUMMARY OF EXPENSES**

Expense Category	Amount
Court Solutions	\$ 70.00
Ground Transportation	779.11
Internet	16.00
Lodging	1,467.91
Meals	361.71
Total Expenses	\$ 2,694.73

#### UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

INVERSIONES LATIN AMERICA POWER LTDA., *et al.*,<sup>1</sup> Case No. 23-11891 (JPM)

Debtors.

(Jointly Administered)

#### FINAL APPLICATION OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE CHAPTER 11 DEBTORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM NOVEMBER 30, 2023 THROUGH JANUARY 12, 2024

AlixPartners, LLP ("<u>AlixPartners</u>"), as financial advisor to the above-captioned debtors and debtors-in-possession (collectively, the "<u>Debtors</u>" or the "<u>Reorganized Debtors</u>"), hereby submits its first and final application (the "<u>Application</u>") for allowance of compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from November 30, 2023 through January 12, 2024 (the "<u>Final Period</u>"). AlixPartners respectfully states as follows:

#### **Jurisdiction and Venue**

1. The United States Bankruptcy Court for the Southern District of New York (the "<u>Court</u>") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

<sup>&</sup>lt;sup>1</sup> The Debtors, together with each Debtor's Chilean identification number, are: Inversiones Latin America Power Ltda. (76.299.635-9); San Juan S.A. (76.319.883-9); and Norvind S.A. (76.919.070-8). The location of the corporate headquarters and the service address for Inversiones Latin America Power Ltda. is Cerro El Plomo 5680, Oficina 1202, Las Condes, Santiago, Chile.

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2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

#### **Relief Requested**

3. The bases for relief requested herein are Sections 330 and 331 of Title 11 of the United States Code (the "<u>Bankruptcy Code</u>"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>"), Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the "<u>Local Rules</u>"), the *Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases*, adopted January 25, 2013 (the "<u>Local Guidelines</u>"), and the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted June 11, 2013 (the "<u>U.S. Trustee Guidelines</u>").

#### **Background**

4. On November 30, 2023 (the "<u>Petition Date</u>"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned Chapter 11 Cases (the "<u>Chapter 11 Cases</u>") in this Court.

5. No trustee or examiner has been appointed in these Chapter 11 Cases.

6. On the Petition Date, the Debtors filed the *Debtors' Joint Prepackaged Chapter 11 Plan* [Docket No. 11] (as amended from time to time, including ECF No. 68, filed on January 1, 2024, and including all supplements, the "<u>Prepackaged Plan</u>") and the *Disclosure Statement for the Joint Prepackaged Plan of Reorganization of Inversiones Latin America Power Ltda. and its Debtor Subsidiaries Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 12] (as amended from time to time, and including all exhibits attached thereto, the "<u>Disclosure Statement</u>").

7. On January 3, 2024 (the "<u>Confirmation Date</u>"), the Court entered the *Findings of Fact, Conclusions of Law and Order (i) Approving the Debtors' Disclosure Statement Pursuant* 

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to Sections 1125 and 1126(b) of the Bankruptcy Code and (ii) Confirming the Debtors' Joint Prepackaged Chapter 11 Plan of Reorganization [Docket No. 92] (the "<u>Confirmation Order</u>"), pursuant to which the Court approved and confirmed the Prepackaged Plan.

8. On January 12, 2024, the Debtors filed the *Notice of (i) Entry of Order (a) Approving Disclosure Statement and (b) Confirming Debtors' Joint Prepackaged Chapter 11 Plan and (ii) the Plan Effective Date* [Docket No. 102] (the "<u>Effective Date Notice</u>"). The Prepackaged Plan went effective on January 12, 2024 (the "<u>Effective Date</u>").

#### **Retention of AlixPartners**

9. On December 12, 2023, the Debtors filed the *Debtors' Application for Entry of an Order Authorizing the Employment and Retention of AlixPartners, LLP as Financial Advisor to the Debtors Nunc Pro Tunc to the Petition Date* [Docket No. 42].

10. On January 3, 2024, the Court entered the Order Authorizing the Employment and Retention of AlixPartners, LLP as Financial Advisor to the Debtors Nunc Pro Tunc to the Petition Date [Docket No. 90] (the "Retention Order").

11. The Retention Order approved the terms of AlixPartners' hourly fee and expense structure set forth in the engagement letter dated October 25, 2023 (the "<u>Engagement Letter</u>"), and authorized AlixPartners to be compensated and reimbursed pursuant to section 327 of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, Bankruptcy Rules, Local Rules, and any other applicable orders of this Court.

12. Pursuant to the Engagement Letter, Robb C. McWilliams is the managing director responsible for this engagement, assisted by a staff of consultants at various levels with a wide range of relevant skills and abilities.

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13. As set forth in the Engagement Letter, AlixPartners' standard hourly rates are reviewed semi-annually and certain professionals' rates were adjusted as of January 1, 2024. Adjustments included reasonable, routine, across-the-board rate increases to reflect promotions and general market increases comparable to market rates of comparable firms performing similar services.

#### Summary of Professional Fees and Expenses During the Final Period

14. During the Final Period, AlixPartners provided an aggregate of 262.8 hours for professional services rendered, incurring fees in the amount of \$207,913.00, and out-of-pocket expenses in the amount of \$2,694.73, for a total amount of \$210,607.73.

15. Detailed descriptions of the professional services rendered by each professional, organized by matter category and by date, and the aggregate hours of services provided (in tenths of an hour) during the Final Period are attached hereto as **Exhibit A**.

16. A detailed analysis of the out-of-pocket expenses incurred during the Final Period are attached hereto as **Exhibit B**.

17. AlixPartners received no payments from the Debtors and the total amount of \$210,607.73 remains outstanding as of the filing of this Application.

#### **Summary of Professional Services Rendered During the Final Period**

18. AlixPartners played an integral role in assisting the Debtors achieve swift and efficient confirmation of the Prepackaged Plan. The Prepackaged Plan (a) restructures approximately \$408.7 million in principal in secured funded det through an exchange of new notes, (b) authorizes the reorganized ILAP to issue approximately \$14 million in senior secured notes, which would have super priority over the take-back senior and convertible notes, (c) contemplates reinstatement or payment in the ordinary course of general unsecured claims and reinstatement of

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existing guarantor equity interests, and (d) contemplates a "best efforts" post-emergence sale of 100% of reorganized equity by December 31, 2025. On November 29, 2023, the Debtors commenced solicitation of votes on the Prepackaged Plan in accordance with the Restructuring Support Agreement that was entered into with key stakeholders, including its equity holders as well as holders representing over 80% of the outstanding principal amount of its senior secured notes due 2033. The plan was supported by holders of 83.8% of the 2033 notes and 100% of the debtors' letter of credit, facility claims, which signed a joinder to the RSA on November 29, 2023. The Debtors minimized their time in bankruptcy, resulting in an accelerated timeline whereby confirmation occurred in just over six weeks from the filing date. As a result, the Debtors consummated a fully consensual Prepackaged Plan that maximizes value for their stakeholders.

19. During the Final Period, AlixPartners: (i) advised and assisted the Debtors in forecasting, planning, controlling and other aspects of cash management, including but not limited to preparing and delivering weekly liquidity reporting, (ii) assisted the Debtors' treasury and accounting teams with additional support, managing vendor inquiries, reconciliations, and payments, (iii) advised the Debtors in its development of the Prepackaged Plan, (iv) assisted with Prepackaged Plan negotiations with various creditor constituents which culminated in a fully-consensual Prepackaged Plan, (v) led the coordination, response and information flow to creditor constituents, which was crucial to ensure all constituents received the information they requested on a timely basis and allowed the company's personnel to focus efforts on their day to day responsibilities, and (vi) facilitated final distribution of funds.

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#### Summary of Services By Category During the Final Period

20. AlixPartners classified services performed into separate categories. The

descriptions below summarize the services provided by AlixPartners to the Debtors during the

Final Period.

#### Matter Code 1.1: Chapter 11 Process/Case Management 25.5 hours - \$23,079.50

- Organized and managed the Debtors' resources to effectively and efficiently plan, coordinate and manage the Chapter 11 process
- Held working sessions to keep the engagement team informed of the latest case developments, remain aligned on the many workstreams, verify that resources are properly allocated to meet deadlines, and ensure all matters and issues are addressed in an efficient and timely manner

### Matter Code 1.3: Cash/Liquidity Matters

#### 144.5 hours - \$111,817.00

- Monitored daily liquidity
- Assisted the Debtors in planning and tracking cash payments
- Developed, designed and prepared various cash flow projections
- Monitored and reported on ongoing covenant compliance and assisted the company in determining what prepetition payments can be made based upon payments made to date, available liquidity, and if allowable by the Court
- Developed detailed weekly cash flow forecasts, which are critical to managing liquidity and serve as a basis for funding requirements

### Matter Code 1.4: Communication & Meetings with Interested Parties 3.0 hours - \$2,569.50

• Met and communicated with various other Debtor professionals, lenders and/or their advisors, and other parties in interest

#### Matter Code 1.5: U.S. Trustee/Court Reporting Requirements

#### 21.7 hours - \$17,124.00

- Complied with the requirements of the Court, the U.S. Trustee, and/or the Bankruptcy Code
- Prepared financial and operating information and monthly operating reports

### Matter Code 1.9: Plan & Disclosure Statement

#### 0.7 hours - \$854.00

- Assisted with the development of the Debtors' disclosure statement and the Prepackaged Plan
- Assisted with the valuation of encumbered and unencumbered assets in the context of an asset sale or reorganization

• Prepared various exhibits including financial projections and expert reports on liquidation analysis

### Matter Code 1.10: Transaction Support

#### 6.2 hours - \$6,658.00

- Assisted the Debtors with various transaction and closing-related tasks, including researching and responding to inquiries and information requests from parties in interest, coordinating and managing closing mechanics
- Prepared and managed the emergence day funds flow

### Matter Code 1.11: Business Operations

### 0.8 hours - \$638.00

- Analyzed Shared Services operations and Service Agreements
- Communicated with vendors

### Matter Code 1.12: Testimony

#### 0.5 hours - \$440.00

- Prepared testimony for Court hearings
- Provided testimony

### Matter Code 1.13: Vendor Management

### 12.0 hours - \$10,131.50

• Assisted the Debtors with vendor management, including performing accounts payable analyses, communicating with vendors

### Matter Code 1.14: Executory Contracts

#### 1.3 hours - \$1,046.50

• Analyzed contracts for counterparty noticing and conflict checks

#### Matter Code 1.17: Preparation for/Attend Court Hearing

### 7.2 hours - \$8,845.00

- Prepared for Court hearings
- Attended Court hearings in person, by video conference, or telephonically

### Matter Code 1.19: Retention Application & Relationship Disclosures

### 32.4 hours - \$19,785.00

- Drafted AlixPartners' retention application, proposed order and declaration
- Analyzed relationship disclosures required by the Bankruptcy Code
- Communications regarding AlixPartners' retention
- Responded to inquiries from the U.S. Trustee regarding AlixPartners' retention

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### Matter Code 1.31: Travel Time

### 7.0 hours - \$4,925.00

- Traveled to meetings outside of consultants' respective "home" office region (Hours billed under this category were billed at 50% of AlixPartners' standard rates)
- 21. AlixPartners has not entered into any agreement, express or implied, with any other

party for the purpose of fixing or sharing fees or other compensation to be paid for professional services rendered in these Chapter 11 Cases. No promises have been received by AlixPartners or any member thereof as to compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code.

#### AlixPartners' Requested Compensation and Reimbursement of Expenses Should be Allowed

22. Section 330 of the Bankruptcy Code provides that a court may award a professional

employed under section 327 of the Bankruptcy Code "reasonable compensation for actual

necessary services rendered . . . and reimbursement for actual, necessary expenses." 11 U.S.C. §

330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and

reimbursement:

In determining the amount of reasonable compensation to be awarded, the court should consider the nature, extent, and the value of such services, taking into account all relevant factors, including-

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue or task addressed; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than under this title.

11 U.S.C. § 330(a)(3).

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23. AlixPartners respectfully submits that the services for which it seeks compensation in this Application were necessary for and beneficial to the Debtors and their estates and were rendered to protect and preserve the Debtors' estates. AlixPartners further believes that it performed the services for the Debtors economically, effectively and efficiently, and that the results obtained benefited not only the Debtors, but also the Debtors' estates and constituencies. AlixPartners further submits that the compensation requested herein is reasonable in light of the nature, extent and value of such services to the Debtors, their estates and all parties in interest.

#### **Certification**

24. A Certification of Robb C. McWilliams is attached hereto as  $\underline{\text{Exhibit C}}$  and incorporated herein.

#### Notice

25. Notice of this Application has been provided to the following parties, or to their counsel, if known: (a) the Debtors, Cerro El Plomo 5680, Oficina 1202, Las Condes, Santiago, Chile (Attention: Esteban Moraga (esteban.moraga@latampower.com)); (b) counsel for the Debtors: Greenberg Traurig, LLP, One Vanderbilt Avenue, New York, NY 10017 (Attention: Oscar N. Pinkas (PinkasO@gtlaw.com); Brian E. Greer (GreerB@gtlaw.com); Leo Muchnik (MuchnikL@gtlaw.com); Sara A. Hoffman (HoffmanS@gtlaw.com); and Jessica M. Wolfert (Jessica.Wolfert@gtlaw.com)); (c) counsel to the Ad Hoc Group: Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, NY 10006 (Attention: Richard J. Cooper (rcooper@cgsh.com); Adam Brenneman (abrenneman@cgsh.com); and Thomas S. Kessler (tkessler@cgsh.com)); and (d) the United States Trustee, Department of Justice, One Bowling Green, Room 534, New York, New York 10004 (Attention: Tara Tiantian (Tara.Tiantian@usdoj.gov) and Mark Bruh (Mark.Bruh@usdoj.gov)). AlixPartners submits that

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such notice is appropriate and sufficient under the circumstances and that no other or further notice need be provided.

### No Prior Request

26. No prior request for the relief sought in this Application has been made to this or any other Court.

[Remainder of page intentionally left blank.]

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#### **Conclusion**

WHEREFORE, AlixPartners, as financial advisor to the Reorganized Debtors, respectfully requests that the Court enter an order providing: (i) a final allowance in the amount of \$207,913.00 as compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred in the amount of \$2,694.73 during the Final Period; (ii) that the Debtors are authorized and directed to pay AlixPartners the remaining outstanding balance of \$210,607.73; and (iii) such other and further relief as this Court deems proper.

Dated: January 31, 2024

ALIXPARTNERS, LLP 2101 Cedar Springs Road Suite 1100 Dallas, TX 75201

/s/ Robb C. McWilliams

By: Robb C. McWilliams Partner & Managing Director 23-11891-jpm Doc 111 Filed 01/31/24 Entered 01/31/24 23:24:55 Main Document Pg 17 of 62

### <u>Exhibit A</u>

Detailed Description of AlixPartners' Fees and Hours by Matter Category

Inversiones Latin America Power Ltda. Calle Cerro El Plomo 5420 Of. 705 Santiago 7560000 Chile

Re:Chapter 11 Process / Case ManagementCode:20010151PA0002.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2023	JRC	Review first day matters.	1.0
12/04/2023	ADB	Prepare communication to vendor	0.3
12/04/2023	ADB	Organize information for reporting purposes	0.3
12/04/2023	HK	Review accounts payable detail to support OCP Motion analysis.	1.2
12/04/2023	HK	Revise noticing details for First Day communications.	1.4
12/05/2023	ADB	Meeting with G. Crisostomo, C. Larrain, V. Ringwald (all Banco de Chile), L.	0.3
		Muchnik (GT), V. Orueta, P. Cruces (both ILAP), C. Sanchez, A. de la Barra (both	
		AlixPartners) re: discuss updated cash accounts permissions under Chapter 11	
12/05/2023	CSM	Meeting with G. Crisostomo, C. Larrain, V. Ringwald (all Banco de Chile), L.	0.3
		Muchnik (GT), V. Orueta, P. Cruces (both ILAP), C. Sanchez, A. de la Barra (both	
		AlixPartners) re: discuss updated cash accounts permissions under Chapter 11	
12/05/2023	НК	Review accounts payable detail to support OCP Motion analysis.	0.8
12/06/2023	ADB	Prepare explanation of regular course of business financing opportunities	0.1
12/06/2023	CSM	Meeting with E. Moraga (ILAP), L. Muchnik, O. Pinkas, O. Stephens (both GT), F.	0.7
		Barros, J. Castro (both Barros) re: review outstanding items, next steps in the	
		Chapter 11 process and weekly deliverables	
12/06/2023	HK	Review accounts payable detail to support OCP Motion analysis.	1.3
12/06/2023	HK	Reviewed creditor noticing information to support potential creditor matrix supplement.	1.8
12/07/2023	CSM	Participate in meetings with V. Orueta (ILAP), L. Muchnik, J. Wolfert (both GT) C.	0.4
		Sanchez, and H. Ku (both AlixPartners) re: OCP motion	
12/07/2023	HK	Participate in meeting with V. Orueta (ILAP), L. Muchnik, J. Wolfert (both GT), C.	0.4
		Sanchez, and H. Ku (both AlixPartners) re: OCP motion.	
12/07/2023	HK	Review historical vendor disbursements to support noticing information revisions.	2.4
12/07/2023	RCM	Correspond with colleagues on case status and next steps	0.3
12/08/2023	CSM	Participate in meeting with R. McWilliams, C. Sanchez, and H. Ku (all	0.3
		AlixPartners) re: vendor management and payment tracking	
12/08/2023	HK	Participate in meeting with R. McWilliams, C. Sanchez, and H. Ku (all	0.3
		AlixPartners) re: vendor management and payment tracking.	
12/08/2023	HK	Review draft contracts data for counterparty noticing information.	2.5
12/08/2023	HK	Review updated accounts payables data for payment tracking.	2.2
12/08/2023	RCM	Participate in meeting with R. McWilliams, C. Sanchez, and H. Ku (all	0.3
		AlixPartners) re: vendor management and payment tracking.	
12/12/2023	CSM	Meeting with E. Moraga (ILAP), L. Muchnik, O. Pinkas, O. Stephens (both GT), F.	0.5
		Barros, J. Castro (both Barros) re: discuss outstanding items, next steps in the	
		Chapter 11 process and weekly deliverables	
12/12/2023	RCM	Correspond with colleagues on status of the case and next steps	0.2

12/12/2023	ICCIVI	Concepting with concegues on status of the case and next steps	0.2
12/13/2023	CSM	Meeting with E. Moraga (ILAP), L. Muchnik, O. Pinkas, O. Stephens (both GT), F.	0.8
		Barros, J. Castro (both Barros) re: review outstanding items, next steps in the	
		Chapter 11 process and weekly deliverables	
12/13/2023	RCM	Correspond with colleague on status of the case and next steps	0.2
12/15/2023	CSM	Meeting with E. Moraga (ILAP), L. Muchnik, O. Pinkas, O. Stephens (both GT), F.	0.3
		Barros, J. Castro (both Barros) re: review outstanding items, next steps in the	
		Chapter 11 process and weekly deliverables	
12/18/2023	ADB	Review weekly task progression	0.1

Inversiones Latin America Power Ltda. Calle Cerro El Plomo 5420 Of. 705 Santiago 7560000 Chile

Re:Chapter 11 Process / Case ManagementCode:20010151PA0002.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/18/2023	HK	Participate in meeting with L. Muchnik, S. Hoffman (both GT) re: updated to	0.4
		creditor matrix.	
12/20/2023	CSM	Meeting with E. Moraga (ILAP), L. Muchnik, O. Pinkas, O. Stephens (both GT), F.	0.5
		Barros, J. Castro (both Barros) re: review outstanding items, next steps in the	
		Chapter 11 process and weekly deliverables	
12/21/2023	ADB	Review weekly task progression	0.1
12/26/2023	ADB	Review weekly task progression	0.2
12/26/2023	JRC	Review declaration and prep for confirmation hearing.	1.0
12/27/2023	CSM	Meeting with E. Moraga (ILAP), L. Muchnik, O. Pinkas, O. Stephens (both GT), F.	0.5
		Barros, J. Castro (both Barros) re: discuss outstanding items, next steps in the	
		Chapter 11 process and weekly deliverables	
01/04/2024	RCM	Correspond with colleagues on the status of open items for the U.S. Trustee and	0.4
		next steps	
01/04/2024	RCM	Review finalized court orders for first day motions	0.3
01/05/2024	RCM	Correspond with colleague on the status of case matters and next steps	0.4
01/09/2024	ADB	Prepared overview of plan confirmation process	0.4
01/10/2024	CSM	Meeting with E. Moraga (ILAP), L. Muchnik, O. Pinkas, O. Stephens (both GT), F.	0.6
		Barros, J. Castro (both Barros) re: discuss outstanding items, next steps in the	
		Chapter 11 process and weekly deliverables	
<b>Total Profession</b>	al Hours	<u> </u>	25.5

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Re:Chapter 11 Process / Case ManagementCode:20010151PA0002.1.1

PROFESSIONAL	RATE	HOURS	FEES
John Castellano	\$1,400/\$1,495	2.0	\$ 2,800.00
Robb C McWilliams	\$1,220/\$1,380	2.1	2,738.00
Christopher Sanchez Montes de Oca	\$880/\$1,025	4.9	4,399.00
Hart Ku	\$805	14.7	11,833.50
Alberto de la Barra	\$715/\$770	1.8	1,309.00
<b>Total Professional Hours and Fees</b>		25.5	\$ 23,079.50

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/30/2023	ADB	Update cash forecast with latest cash movements	1.2
12/01/2023	ADB	Update daily cash balance by account for the 13W Cash Flow Forecast	0.6
12/01/2023	CSM	Analyze Operational Disbursements forecast for the week ending 12/09/23 by	1.5
		disbursement category	
12/04/2023	ADB	Finalize previous week cash flow actuals	0.7
12/04/2023	ADB	Review last week actuals vs forecast for collections and disbursements	0.2
12/04/2023	ADB	Update cash forecast with latest cash balance	0.2
12/04/2023	ADB	Update cash forecast with latest collection information	0.3
12/04/2023	ADB	Update cash forecast with latest payment information	0.3
12/05/2023	ADB	Analyze updated accounts receivables information to update forecasted collections	1.9
12/05/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review updates of vendor payment terms	0.1
12/05/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: weekly collections actuals	0.1
12/05/2023	ADB	Review cash forecast week to week variance	0.2
12/05/2023	ADB	Update cash forecast with new vendor terms	0.2
12/05/2023	ADB	Update cash forecast with updated collection projections	0.3
12/05/2023	ADB	Update cash forecast with updated vendor terms	0.2
12/05/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: weekly collections actuals	0.1
12/05/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review updates of vendor payment terms	0.1
12/06/2023	ADB	Analyze latest accounts receivables information	1.3
12/06/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review latest 13 week cash flow forecast	0.3
12/06/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review latest accounts receivables information	0.1
12/06/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review latest cash balance reconciliation	0.1
12/06/2023	ADB	Call with V. Orueta (ILAP) re: review latest updates on vendor payment	0.3
12/06/2023	ADB	Call with V. Orueta, P. Cruces (both ILAP), C. Sanchez, A. de la Barra (both AlixPartners) re: review analysis of collection forecast	0.6
12/06/2023	ADB	Revise week to week variance reporting	0.2
12/06/2023	ADB	Review Debtor's comments of latest accounts receivables status	1.3
12/06/2023	ADB	Update cash forecast with latest accounts receivables information	0.2
12/06/2023	ADB	Update cash forecast with latest cash balance	0.4
12/06/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review latest 13 week cash flow forecast	0.3
12/06/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review latest accounts	0.1

		receivable information	
12/06/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review latest cash	0.1
		balance reconciliation	
12/06/2023	CSM	Call with V. Orueta, P. Cruces (both ILAP) C. Sanchez, A. de la Barra (both	0.6
		AlixPartners) re: review of forecast of collections for subsequent weeks based on	
		variances from previous week	
12/07/2023	ADB	Analyze differences between overall week to week cash flow forecast variance	0.8
12/07/2023	ADB	Email to P. Cruces (ILAP) re: access to internal accounting system	0.1

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/07/2023	ADB	Email to P. Cruces (ILAP) re: provide more information about individual client	0.3
		invoicing status	
12/07/2023	ADB	Email to P. Cruces (ILAP) re: request information about individual client invoicing	0.2
		status	
12/07/2023	ADB	Review invoicing status of Vestas	0.1
12/07/2023	ADB	Prepare analysis to explain week to week collections variance	1.1
12/07/2023	ADB	Review latest week to week collections variance	0.6
12/07/2023	ADB	Update cash forecast with latest cash balance	0.3
12/07/2023	ADB	Update cash forecast with latest collections information	0.7
12/07/2023	CSM	Prepare weekly variance of weekly collections against budget for the week ending 12/02/23 in accordance with Cash Collateral order	0.7
12/07/2023	CSM	Prepare weekly variance of weekly disbursements against budget for the week	1.1
		ending 12/02/23 in accordance with Cash Collateral order	
12/08/2023	ADB	Analyze collections week to week variation	0.3
12/08/2023	ADB	Prepare explanation of variation in collections in the short term	1.2
12/08/2023	ADB	Review cash forecast collections week to week variance	0.9
12/08/2023	CSM	Prepare weekly variance report for bondholder advisors	0.7
12/11/2023	ADB	Analyze week to week differences in accounts receivables	0.6
12/11/2023	ADB	Analyze week to week differences in collections	0.4
12/11/2023	ADB	Email to P. Cruces (ILAP) re: request information about operational disbursements	0.2
		for the previous week	
12/11/2023	ADB	Prepare cash balance report of the filing date	0.6
12/11/2023	ADB	Review comparison between accounts receivables information	0.4
12/11/2023	CSM	Call with V. Orueta, E. Moraga (both ILAP), L. Muchnik (GT) re: review of	0.5
		operational process for monthly flow of funds from Banco de Chile accounts	
12/12/2023	ADB	Revise cash flow forecast weekly variance explanation comment	0.1
12/12/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review cash balance	0.4
	112.2	report of the filing date	011
12/12/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review week to week	0.3
	112.2	variance of collections	0.0
12/12/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review cash flow	0.2
12, 12, 2023		forecast weekly variance	0.2
12/12/2023	ADB	Call with V. Orueta (ILAP) re: access to internal systems	0.1
12/12/2023	ADB	Close previous week cash flow actuals	0.7
12/12/2023	ADB	Analyze weekly collections information against last week accounts receivables	0.7
12/12/2023	ADB	Email to H. Ku (AlixPartners) re: provide comments to revision of proposed weekly	0.7
12/12/2023	ΠΟΟ	payments	0.2
12/12/2023	ADB	Email to I. Garnham (ILAP) re: request additional information of weekly payments	0.4
12/12/2023	ADB	Email to P. Cruces (ILAP) re: request further information about payments to	0.4
12/12/2023	ADD	Linan to 1. Cruces (ILAI) to. request further information about payments to	0.1

12/12/2023	nd d	specific vendors	0.1
12/12/2023	ADB	Email to P. Cruces (ILAP) re: request information about cash balances for previous	0.1
		week	
12/12/2023	ADB	Prepare weekly disbursement information	1.1
12/12/2023	ADB	Review cash balance report of the filing date	0.4
12/12/2023	ADB	Review updated accounts receivables information	0.3
12/12/2023	ADB	Update cash balance report of the filing date	0.6
12/12/2023	ADB	Update cash forecast with latest cash balance	0.2

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/12/2023	ADB	Update cash forecast with latest collection information	0.2
12/12/2023	ADB	Update cash forecast with latest payment information	0.4
12/12/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review cash balance report of the filing date	0.4
12/12/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review week to week variance of collections	0.3
12/12/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review cash flow forecast weekly variance	0.2
12/12/2023	CSM	Review timing and permanent variances of operational disbursements for 2 weeks from week ending 12/02/23 to week ending 12/09/23	1.3
12/12/2023	CSM	Review variance of collections and disbursements for week ending 12/09/23	1.1
12/13/2023	ADB	Analyze latest information of weekly collections	0.8
12/13/2023	ADB	Analyze past week collection information	0.3
12/13/2023	ADB	Call with C. Sanchez, A. de la Barra (all AlixPartners) re: review of accounts receivables	0.2
12/13/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review tasks progression	0.1
12/13/2023	ADB	Call with P. Cruces (ILAP) re: review cash payments around filing date	0.1
12/13/2023	ADB	Call with S. Hoffman (GT) re: review cash payments around filing date	0.1
12/13/2023	ADB	Call with V. Orueta (ILAP) re: analyze specific proposed payments to Vesta	0.1
12/13/2023	ADB	Call with V. Orueta, G. Milic (both ILAP), C. Sanchez, A. de la Barra (both AlixPartners) re: review weekly cash forecast variance report	0.2
12/13/2023	ADB	Email to H. Ku (AlixPartners) re: analyze revision of weekly proposed vendor payments	0.1
12/13/2023	ADB	Email to P. Cruces (ILAP) re: request additional information of proposed weekly payments	0.1
12/13/2023	ADB	Email to V. Orueta, P. Cruces (ILAP) re: answer inquiry about a specific proposed payment	0.1
12/13/2023	ADB	Prepare collection variance explanation	1.2
12/13/2023	ADB	Review cash payments around filing date	0.3
12/13/2023	ADB	Review latest information of accounts receivables	1.4
12/13/2023	ADB	Review weekly proposed vendor payments	0.1
12/13/2023	ADB	Review timing vs permanent variance of last week's payments	1.1
12/13/2023	ADB	Update weekly disbursement information	0.1
12/13/2023	CSM	Call with C. Sanchez, A. de la Barra (all AlixPartners) re: review of accounts receivables	0.2
12/13/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: update of weekly cash flow update process	0.1
12/13/2023	CSM	Call with V. Orueta, G. Milic (both ILAP), C. Sanchez, A. de la Barra (both	0.2

12/13/2023	CONT	Can white V. Oracia, G. White (John 12/11), C. Sanchez, M. de la Darra (John	0.2
		AlixPartners) re: review of week to week variance report	
12/14/2023	ADB	Analyze collection information for current week	0.9
12/14/2023	ADB	Call with V. Orueta (ILAP): review latest analysis on collections forecast	0.3
12/14/2023	ADB	Finalize access to internal accounting system	0.3
12/14/2023	ADB	Email to H. Ku (AlixPartners) re: request review of approved order amounts	0.1
12/14/2023	ADB	Prepare collections forecast analysis to review with V. Orueta	0.7
12/14/2023	ADB	Review differences between forecasted and actual collections	0.8
12/14/2023	ADB	Update cash flow forecast with latest advisors cost information	0.9

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/14/2023	ADB	Update cash forecast model with latest disbursement information	0.1
12/14/2023	ADB	Update cash forecast with latest cash balance	0.9
12/14/2023	ADB	Update cash forecast with latest cash collections information	0.4
12/15/2023	ADB	Call with G. Masman (ILAP) re: research further information about internal accounting system	0.4
12/15/2023	ADB	Call with V. Orueta (ILAP) re: research further information about internal accounting system	0.1
12/15/2023	ADB	Finalize access to internal accounting system	0.4
12/15/2023	ADB	Prepare MOR preparation	0.2
12/15/2023	ADB	Prepare software installation request to gain access to internal systems	0.4
12/15/2023	ADB	Review case task progression	0.2
12/15/2023	ADB	Analyze week to week variances of cash flow forecast	0.3
12/15/2023	ADB	Update cash flow forecast with latest collections information	0.4
12/15/2023	CSM	Prepare weekly variance report for previous week in accordance with Cash Collateral Order	0.7
12/18/2023	ADB	Finalize updating forecast with previous week cash flow actuals	1.4
12/18/2023	ADB	Email to H. Ku (AlixPartners) re: request information related to vendor payments	0.1
12/18/2023	ADB	Email to H. Ku (AlixPartners) re: request review of approved order amounts	0.1
12/18/2023	ADB	Prepare summary of updates to cash flow forecast	0.9
12/18/2023	ADB	Review differences between forecasted and actuals	0.7
12/18/2023	ADB	Review updated information on collections	0.6
12/18/2023	ADB	Update cash forecast with latest cash balance	0.3
12/18/2023	ADB	Update cash forecast with latest collection information	0.3
12/18/2023	ADB	Update cash forecast with latest payment information	0.4
12/18/2023	HK	Review planned disbursements per First Day Orders.	0.2
12/19/2023	ADB	Prepare two week accumulated variance to the cash flow forecast	0.3
12/19/2023	ADB	Analyze service agreements historical payments	0.6
12/19/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: follow-up review of updated cash flow forecast	0.3
12/19/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review updated cash flow forecast	0.4
12/19/2023	ADB	Review permitted amount of payments according to all trade motion	0.4
12/19/2023	ADB	Draft email to H. Ku (AlixPartners) re: request review of proposed weekly vendor payments	0.7
12/19/2023	ADB	Draft email to P. Cruces (ILAP) re: request information about timing of invoices	0.2
12/19/2023	ADB	Email to I. Garnham (ILAP) re: request additional information of weekly vendor payments	0.1
12/19/2023	ADB	Email to P. Cruces (ILAP) re: request more information service agreements historical payments	0.2

		insterieur pujments	
12/19/2023	ADB	Meeting with V. Orueta (ILAP) re: follow-up review latest catch up payments	0.2
12/19/2023	ADB	Meeting with V. Orueta (ILAP) re: review latest information of catch-up payments	0.6
12/19/2023	ADB	Prepare weekly analysis of accounts receivables	0.9
12/19/2023	ADB	Prepare weekly vendor payment information	1.2
12/19/2023	ADB	Review service agreements historical payments	0.6
12/19/2023	ADB	Update cash forecast with latest cash balance	0.3
12/19/2023	ADB	Update the cash forecast with the latest catch up payments information	0.6

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/19/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: follow-up review of updated cash flow forecast	0.3
12/19/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review updated cash flow forecast	0.4
12/19/2023	CSM	Review timing and permanent variances of collections for the week ending 12/16/23	1.1
12/19/2023	CSM	Review timing and permanent variances of operational disbursements for the week ending $12/16/23$	1.2
12/20/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review of service agreement historical payments summary table	0.2
12/20/2023	ADB	Call with H. Ku, A. de la Barra (both AlixPartners) re: review of weekly vendor payments	0.1
12/20/2023	ADB	Review insurance certificate information	0.2
12/20/2023	ADB	Email to P. Cruces (ILAP) re: request further information about service agreements historical payments	0.2
12/20/2023	ADB	Email to P. Cruces (ILAP) re: request information about timing of invoices	0.4
12/20/2023	ADB	Prepare software to access accounting system information	0.9
12/20/2023	ADB	Meeting with V. Orueta (ILAP) re: review of service agreement historical payments summary	0.1
12/20/2023	ADB	Prepare service agreement historical payments summary table	0.4
12/20/2023	ADB	Prepare weekly accounts receivables variance analysis	1.1
12/20/2023	ADB	Review cash flow forecast accumulated variance	0.7
12/20/2023	ADB	Review list of weekly proposed payment list	0.2
12/20/2023	ADB	Review timing of Vestas payment	0.3
12/20/2023	ADB	Review service agreements historical payments information	0.4
12/20/2023	ADB	Update weekly vendor payment list information	0.4
12/20/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review of service agreement historical payments summary table	0.2
12/20/2023	НК	Call with H. Ku, A. de la Barra (both AlixPartners) re: review of weekly vendor payments	0.1
12/21/2023	ADB	Analyze historical vs current professional advisor payments	0.9
12/21/2023	ADB	Call with P. Cruces (ILAP) re: review updated list of weekly proposed vendor payment list	0.2
12/21/2023	ADB	Compile advisor invoices received	0.3
12/21/2023	ADB	Meeting with V. Orueta (ILAP) re: review latest cash balance estimates	0.3
12/21/2023	ADB	Prepare current week accounts receivables information for the weekly variance analysis	1.8
12/21/2023	ADB	Prepare filing week accounts receivables information for the variance analysis	1.1
12/21/2023	ADB	Prepare post filing week accounts receivables information for the variance analysis	1.3
12/21/2023	ADB	Review main drivers behind daily cash balance variance	0.6

12/21/2023	ADD	Review main arrivers bennite dany easil balance variance	0.0
12/21/2023	ADB	Review updated list of weekly proposed vendor payment list	0.4
12/21/2023	ADB	Update cash forecast with latest cash balance	0.2
12/21/2023	CSM	Review permanent vs timing variances for collections for the week ending 12/16/23	0.7
12/22/2023	ADB	Call with V. Orueta (ILAP) re: review historical commercial balances	0.3
12/22/2023	ADB	Review cash balances for previous week	0.3
12/22/2023	ADB	Prepare explanation of main week to week cost variances	0.4
12/22/2023	ADB	Analyze historical commercial balances	0.2
12/22/2023	ADB	Review weekly payments to compare it to the original forecast	0.4

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/22/2023	CSM	Prepare weekly variance report related to variance to the week ending 12/16/23	0.8
12/22/2023	CSM	Review permanent vs. timing variances for disbursements for the week ending 12/16/23	0.7
12/26/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review updated cash collateral budget	0.6
12/26/2023	ADB	Close previous week cash flow actuals	0.4
12/26/2023	ADB	Revise cash collateral budget update	0.2
12/26/2023	ADB	Review differences between forecasted vs actual net cash	0.3
12/26/2023	ADB	Review week to week variance of operational disbursements	0.6
12/26/2023	ADB	Update cash forecast with latest cash balance	0.3
12/26/2023	ADB	Update cash forecast with latest collection information	0.6
12/26/2023	ADB	Update cash forecast with latest payment information	0.2
12/26/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review updated cash collateral budget	0.6
12/26/2023	CSM	Prepare updated 13 week collections forecast for new 13 week budget	1.2
12/27/2023	ADB	Update cash flow forecast with February commercial balance	0.1
12/27/2023	ADB	Update cash flow forecast with March tax forecast	0.1
12/27/2023	ADB	Analyze collection information for the previous week	0.8
12/27/2023	ADB	Analyze updated accounts receivables information	0.4
12/27/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review weekly variance report	0.4
12/27/2023	ADB	Call with G. Masman (ILAP) re: prepare access to accounting system	0.2
12/27/2023	ADB	Call with P. Cruces (ILAP) re: review accounts receivables files	0.4
12/27/2023	ADB	Updates dates of weekly payment information	0.1
12/27/2023	ADB	Check specific payments proposed for this week	0.1
12/27/2023	ADB	Email to H. Ku (AlixPartners) re: review of proposed weekly payments	0.1
12/27/2023	ADB	Email to I. Garnham (ILAP) re: request additional information of weekly vendor payments	0.1
12/27/2023	ADB	Meeting with S. Olmedo (ILAP) re: finalize access process for accounting system information	0.2
12/27/2023	ADB	Meeting with S. Olmedo (ILAP) re: prepare access to accounting system	0.3
12/27/2023	ADB	Meeting with V. Orueta (ILAP) re: review specific vendor payment plan	0.2
12/27/2023	ADB	Prepare weekly vendor payment information	0.4
12/27/2023	ADB	Summarize call to review accounts receivables files	0.3
12/27/2023	ADB	Review last week's collections	0.4
12/27/2023	ADB	Update accounts receivables file	0.7
12/27/2023	ADB	Update cash flow forecast to prepare for updated budget	0.8
12/27/2023	ADB	Update cash flow forecast with updated collections information	0.8
12/27/2023	ADB	Update cash flow forecast with updated commercial cost information	0.2

12/2//2025	<b>I ID D</b>	opulie cush now forecast with updated commercial cost mitorination	0.2
12/27/2023	ADB	Update weekly disbursement information	0.2
12/27/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review weekly variance	0.4
		report	
12/27/2023	CSM	Call with E. Moraga (ILAP) re: review of updated 13W cash flow budget through	1.1
		week ending 03-03-24	
12/27/2023	CSM	Prepare updated 13 week operational disbursements forecast for new 13 week	1.3
		budget	

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/27/2023	CSM	Prepare updated weekly variance report re: 13 week cash flow budget actuals vs forecast	0.9
12/27/2023	CSM	Review projected fees for Company professionals through emergence	0.8
12/28/2023	ADB	Finalize adjustments to cash flow forecast budget	0.8
12/28/2023	ADB	Meeting with V. Orueta (ILAP), C. Sanchez, A. de la Barra (both AlixPartners) re: review updated budget	0.8
12/28/2023	ADB	Email to H. Ku (AlixPartners) re: provide comments to questions about proposed weekly payments	0.2
12/28/2023	ADB	Update professional fees forecast in cash flow forecast	0.7
12/28/2023	CSM	Meeting with V. Orueta (ILAP) C. Sanchez, A. de la Barra (both AlixPartners) re: review updated budget	0.8
12/28/2023	RCM	Email to C. Sanchez (AlixPartners) re: review forecasted professional fees through effective date	0.3
12/29/2023	ADB	Revise catch up payment classification in cash flow forecast	0.2
12/29/2023	ADB	Revise withholding tax calculation in cash flow forecast	0.1
12/29/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review updated cash flow budget	0.4
12/29/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: update of specific advisor fee forecast	0.1
12/29/2023	ADB	Call with E. Moraga (ILAP) re: review updated cash flow budget	0.2
12/29/2023	ADB	Prepare variance analysis of professional fee payments at emergence	0.4
12/29/2023	ADB	Create forecast to forecast tab in cash flow forecast	0.4
12/29/2023	ADB	Email to P. Cruces (ILAP) re: request information of weekly payments	0.1
12/29/2023	ADB	Finalize adjustments to original cash flow forecast budget	0.2
12/29/2023	ADB	Grant access to internal folder to G. Milic (ILAP)	0.1
12/29/2023	ADB	Meeting with E. Moraga, V. Orueta (both ILAP) C. Sanchez, A. de la Barra (both AlixPartners) re: review of updated 13W budget	0.4
12/29/2023	ADB	Review weekly collections	0.9
12/29/2023	ADB	Update forecasted advisor fees in cash flow forecast	0.4
12/29/2023	ADB	Update cash flow forecast with latest collection information	0.4
12/29/2023	ADB	Update cash flow forecast with latest payment information	0.2
12/29/2023	ADB	Update cash forecast with latest cash balance	0.3
12/29/2023	CSM	Call with A. Morley (Rothschild) re: review variances to professional fee estimates through emergence	0.5
12/29/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review updated cash flow budget	0.4
12/29/2023	CSM	Call with C. Sanchez, A. de la barra (both AlixPartners) re: update of specific advisor fee forecast	0.1
12/29/2023	CSM	Meeting with E. Moraga, V. Orueta (both ILAP) C. Sanchez, A. de la Barra (both	0.4

12/2//2023	COM	Weeting with L. Woraga, V. Ordeta (both "LAT") C. Banenez, A. de la Darra (both	U.T
		AlixPartners) re: review of updated 13W budget	
12/29/2023	CSM	Review forecast to forecast variances of collections for the updated 13W Cash Flow	1.2
		budget.	
12/29/2023	CSM	Review forecast to forecast variances of collections for the updated 13W Cash Flow	1.2
		budget.	
01/03/2024	ADB	Finalize cash flow actuals for the previous week	0.7
01/03/2024	ADB	Prepare week to week variation report	0.6
01/03/2024	ADB	Update cash forecast with latest cash balance	0.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
01/03/2024	RCM	Listen to confirmation hearing	0.3
01/04/2024	ADB	Email to H. Ku (AlixPartners) re: seeking confirmation for weekly payment	0.3
01/04/2024	ADB	Email to P. Cruces (AlixPartners) re: provide comments to proposed weekly	0.3
		payments	
01/04/2024	ADB	Prepare weekly payment information	0.7
01/04/2024	ADB	Review weekly payment information	0.7
01/05/2024	ADB	Review week to week variance report	0.7
01/05/2024	ADB	Update cash forecast with latest cash balance	0.7
01/08/2024	ADB	Prepare wire instructions for funds flow	0.6
01/08/2024	ADB	Review actual net cash flow for the previous week	0.6
01/08/2024	ADB	Update cash forecast with latest cash balance	0.3
01/08/2024	CSM	Review detailed collections from previous week by account	1.1
01/08/2024	CSM	Review operational disbursement amounts from previous week	0.9
01/09/2024	ADB	Finalize cash flow actuals for previous week	0.2
01/09/2024	ADB	Compare latest accounts receivables information against last week information	0.6
01/09/2024	ADB	Compile latest professional invoices	0.2
01/09/2024	ADB	Prepare week to week variance analysis	0.6
01/09/2024	ADB	Review latest accounts receivables information	0.6
01/09/2024	ADB	Update cash forecast with latest cash balance	0.6
01/09/2024	ADB	Update cash forecast with latest collections information	0.2
01/09/2024	ADB	Update cash forecast with latest payment information	0.2
01/09/2024	CSM	Prepare actual vs forecast variance of week ending $01/05/24$ and the two weeks	1.1
		ending 01/05/24 for operational disbursements by category and explanation of	
		significant variances	
01/09/2024	CSM	Prepare Funds Flow for exit financing, payment of professional fees and	1.2
		professional fee escrow	
01/10/2024	ADB	Prepare forecast to actuals analysis with updated budget	0.4
01/10/2024	ADB	Analyze latest accounts receivables information	1.1
01/10/2024	ADB	Analyze latest collections information	0.8
01/10/2024	ADB	Analyze latest payment information	0.9
01/10/2024	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review latest cash flow	0.2
		forecast	-
01/10/2024	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review of weekly cash	0.2
		flow variances	-
01/10/2024	ADB	Call with V. Orueta (ILAP) re: review weekly cash flow variances	0.6
01/10/2024	ADB	Email to P. Cruces (ILAP) re: request information about last week payments	0.4
01/10/2024	ADB	Prepare advisory comparison	0.3
01/10/2024	ADB	Prepare projected collections analysis for discussions with client	2.1
01/10/2024	ADB	Review differences between forecasted collections and actuals collections using	0.9
01/10/2021		collections and accounts receivables analysis	0.9
01/10/2024	ADB	Review latest accounts receivables information	0.4
01/10/2024	ADB	Review latest accounts receivables information	0.1
01/10/2024	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review latest cash flow	0.2
01/10/2027	COM	forecast	0.2
01/10/2024	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: review week to week	0.2
01/10/2027		cash flow variance	0.2

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
01/10/2024	CSM	Prepare actual vs forecast variance of week ending 01/05/24 and the two weeks	0.9
		week ending $12/29/23$ and week ending $01/05/24$ for operational collections	
		reviewing timing vs permanent impacts	
01/10/2024	CSM	Prepare weekly variance report of actual against forecast for Bondholder advisors	1.0
01/11/2024	ADB	Analyze week's collections details	1.1
01/11/2024	ADB	Prepare forecats to forecast analysis	0.3
01/11/2024	ADB	Compile specific vendor invoices	0.4
01/11/2024	ADB	Email to C. Sanchez (AlixPartners) re: send total advisors fees summary	0.1
01/11/2024	ADB	Email to E. Moraga (ILAP) re: analysis of professional fees forecast	0.1
01/11/2024	ADB	Email to L. Muchnik (GT) re: review commercial vendor invoices	0.3
01/11/2024	ADB	Email to P. Cruces (ILAP) re: comments about proposed weekly payments	0.2
01/11/2024	ADB	Meeting with V. Orueta (ILAP), C. Sanchez, A. de la Barra (both AlixPartners) re:	0.4
		review latest cash flow forecast	
01/11/2024	ADB	Prepare total professional fees summary	1.2
01/11/2024	ADB	Review payment information	0.1
01/11/2024	CSM	Call with V. Orueta (ILAP) re: review of weekly cash flow variance	0.8
01/11/2024	CSM	Meeting with V. Orueta (ILAP), C. Sanchez, A. de la Barra (both AlixPartners) re:	0.4
		review latest cash flow forecast	
01/12/2024	ADB	Review week to week collection analysis	0.7
01/12/2024	ADB	Update cash forecast with latest cash balance	0.4
<b>Total Professiona</b>	ll Hours		144.5

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Re:	Cash / Liquidity Matters
Code:	20010151PA0002.1.3

PROFESSIONAL	RATE	HOURS	FEES
Robb C McWilliams	\$1,220/\$1,380	0.6	\$ 780.00
Christopher Sanchez Montes de Oca	\$880/\$1,025	34.4	31,403.00
Hart Ku	\$805	0.3	241.50
Alberto de la Barra	\$715/\$770	109.2	79,392.50
<b>Total Professional Hours and Fees</b>		144.5	\$ 111,817.00

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Re:Communication & Meetings with Interested PartiesCode:20010151PA0002.1.4

DATE	PROFESSIONAL	<b>DESCRIPTION OF SERVICES</b>	HOURS
12/08/2023	CSM	Telephone call with A. Morley (Rothschild) to review weekly variances of	0.6
		collections and disbursements for the week ending 12/02/23	
12/11/2023	HK	Participate in meeting with L. Munchik, S. Hoffman, J. Wolfert (all GT) re: PIP	0.5
		supplement.	
12/13/2023	ADB	Email to P. Cruces (ILAP) re: request information about last week's cash balances	0.2
12/15/2023	CSM	Telephone call with A. Morley (Rothschild) to review weekly variances of	0.3
		collections and disbursements for the week ending 12/09/23	
12/29/2023	CSM	Call with A. Morley (Rothschild) re: review of funds flow	0.5
12/29/2023	CSM	Call with A. Morley (Rothschild) to review updated 13W budget	0.9
<b>Total Professiona</b>	al Hours		3.0

Re:

Code:

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Communication & Meetings with Interested Parties 20010151PA0002.1.4

PROFESSIONAL	RATE	HOURS	FEES
Christopher Sanchez Montes de Oca	\$880/\$1,025	2.3	\$ 2,024.00
Hart Ku	\$805	0.5	402.50
Alberto de la Barra	\$715/\$770	0.2	143.00
<b>Total Professional Hours and Fees</b>		3.0	\$ 2,569.50

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Re:U.S. Trustee / Court Reporting RequirementsCode:20010151PA0002.1.5

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/05/2023	НК	Review updated accounts payables data for payment tracking.	2.1
12/05/2023	LMB	Review Court docket	0.2
12/07/2023	HK	Review updated accounts payables data for payment tracking.	1.3
12/11/2023	ADB	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: prepare cash balance	0.2
		report of filing date for U.S. Trustee	
12/11/2023	ADB	Review historical payments to selected OCPs	0.7
12/11/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: prepare cash balance	0.2
		report of filing date for U.S. Trustee	
12/11/2023	CSM	Review report of total disbursements on filing date to report to the U.S. Trustee	1.5
12/12/2023	ADB	Email to L. Muchnick, S, Hoffman (both GT) re: send cash balance report of the	0.2
		filing date for U.S. Trustee	
12/13/2023	ADB	Call with C. Sanchez, A. de la Barra (all AlixPartners) re: review latest information	0.4
		of cash payments around filing date for U.S. Trustee	
12/13/2023	ADB	Call with P. Cruces (ILAP) re: review of cash payments around filing date for U.S.	0.3
12/13/2023	ADB	Email to C. Sanchez (AlixPartners) re: summarize payment process for explanation	0.6
		to the U.S. Trustee	
12/13/2023	ADB	Email to S. Hoffman (GT) re: explain in detail payment process for explanation to	0.2
		the U.S. Trustee	
12/13/2023	ADB	Review email from S. Hoffman (GT) regarding outstanding items from U.S. Trustee	0.1
12/13/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners) re: latest information of	0.4
		cash payments around filing date for U.S. Trustee	
12/13/2023	HK	Review initial Debtor interview documents for delivery to U.S. Trustee.	0.8
12/14/2023	ADB	Call with C. Sanchez, A. de la Barra (all AlixPartners) re: review latest information	0.5
		of cash payments around filing date to report to the U.S. Trustee	
12/14/2023	ADB	Email to S. Hoffman (GT) re: answer questions regarding detailed payment process	0.4
12/14/2023	CSM	Call with C. Sanchez, A. de la Barra (both AlixPartners), re: review latest	0.5
		information of cash payments around filing date	
12/14/2023	RCM	Correspond with colleagues on status and next steps for court reporting	0.3
12/15/2023	ADB	Prepare MOR explanation material to present it to the client	0.6
12/17/2023	HK	Revise creditor information to support creditor matrix review activity.	1.1
12/18/2023	ADB	Review MOR information	0.8
12/18/2023	HK	Revise creditor information to support creditor matrix review activity.	0.3
12/19/2023	HK	Revise creditor information to support creditor matrix review activity.	0.5
12/20/2023	ADB	Meeting with V. Orueta, G. Milic, I. Garnham (all ILAP) re: review MOR	0.5
		information	
12/20/2023	ADB	Meeting with V. Orueta, G. Milic, I. Garnham (all ILAP), H. Ku, C. Sanchez, A. de	0.3
		la Barra (all AlixPartners) re: review MOR information	
12/20/2023	ADB	Prepare MOR preparation meeting	0.8
12/20/2023	CSM	Meeting with V. Orueta, G. Milic, I. Garnham (all ILAP), H. Ku, C. Sanchez, A. de	0.3

12:20:2020	0.01/1		0.0
		la Barra (all AlixPartners) re: review MOR information	
12/20/2023	HK	Meeting with V. Orueta, G. Milic, I. Garnham (all ILAP), H. Ku, C. Sanchez, A. de	0.3
		la Barra (all AlixPartners) re: review MOR information	
12/20/2023	HK	Revise creditor information to support creditor matrix review activity.	0.5
12/21/2023	HK	Revise creditor information to support creditor matrix review activity.	1.2
12/22/2023	HK	Revise creditor information to support creditor matrix review activity.	1.1
12/27/2023	HK	Revise creditor information to support creditor matrix review activity.	1.6

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Re:	U.S. Trustee / Court Reporting Requirements
Code:	20010151PA0002.1.5

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
01/09/2024	ADB	Email to S. Hoffman and L. Muchnik (both GT) re: send cash balance report for the	0.2
		U.S. Trustee	
01/09/2024	ADB	Prepare cash balances report for U.S. Trustee	0.7
<b>Total Profession</b>	al Hours		21.7

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Re:U.S. Trustee / Court Reporting RequirementsCode:20010151PA0002.1.5

PROFESSIONAL	RATE	HOURS	FEES
Robb C McWilliams	\$1,220/\$1,380	0.3	\$ 366.00
Christopher Sanchez Montes de Oca	\$880/\$1,025	2.9	2,552.00
Hart Ku	\$805	10.8	8,694.00
Alberto de la Barra	\$715/\$770	7.5	5,412.00
Lisa Marie Bonito	\$500	0.2	100.00
<b>Total Professional Hours and Fees</b>		21.7	\$ 17,124.00

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Re:Plan & Disclosure StatementCode:20010151PA0002.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/29/2023	RCM	Review correspondence from client attorneys and client personnel on the Plan of	0.3
		Reorganization and next steps	
12/29/2023	RCM	Review limited objection to the Plan of Reorganization	0.4
<b>Total Profession</b>	al Hours		0.7

Re:	Plan & Disclosure Statement
Code:	20010151PA0002.1.9

PROFESSIONAL	RATE	HOURS	 FEES
Robb C McWilliams	\$1,220/\$1,380	0.7	\$ 854.00
<b>Total Professional Hours and Fees</b>		0.7	\$ 854.00

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Re:Transaction SupportCode:20010151PA0002.1.10

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/21/2023	CSM	Call with B. Kardos, R. McWilliams, C. Sanchez (all AlixPartners) re: review	0.5
		Professional Fees Escrow Account document	
12/21/2023	ESK	Review Escrow Agreement	1.0
12/21/2023	ESK	Call with B. Kardos, R. McWilliams, C. Sanchez (all AlixPartners) re: review	0.5
		Professional Fees Escrow Account document	
12/21/2023	RCM	Call with B. Kardos, R. McWilliams, C. Sanchez (all AlixPartners) re: review	0.5
		Professional Fees Escrow Account document	
12/21/2023	RCM	Correspond with counsel on escrow agreement and next steps	0.3
12/21/2023	RCM	Review escrow agreement received from counsel	0.8
12/22/2023	RCM	Review updated escrow agreement received from counsel	0.4
12/27/2023	RCM	Correspond with counsel on the escrow agreement and bank information	0.7
12/28/2023	CSM	Review Professional Fee Escrow document	0.4
01/08/2024	RCM	Review latest updates to the escrow agreement received from counsel	0.3
01/09/2024	RCM	Correspond with colleague on the escrow agreement and next steps	0.2
01/09/2024	RCM	Correspond with counsel on the executed escrow agreement	0.4
01/10/2024	KAS	Email. J. Castellano, R. McWilliams and C. Sanches Montes De Oca (all	0.2
		AlixPartners) to follow up re: status of escrow agreement signatures	
<b>Total Profession</b>	al Hours		6.2

Re:	Transaction Support
Code:	20010151PA0002.1.10

PROFESSIONAL	RATE	HOURS	FEES
Robb C McWilliams	\$1,220/\$1,380	3.6	\$ 792.00
Elizabeth S Kardos	\$800	1.5	1,200.00
Christopher Sanchez Montes de Oca	\$880/\$1,025	0.9	4,536.00
Kaitlyn A Sundt	\$585/\$650	0.2	130.00
<b>Total Professional Hours and Fees</b>		6.2	\$ 6,658.00

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Re:Business OperationsCode:20010151PA0002.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/19/2023	ADB	Meeting with E. Moraga (ILAP), O. Stephens, L. Muchnik (both GT), A. Lefkovits, N. Angelo (both Lazard), C. Sanchez, A. de la Barra (both AlixPartners) re: discuss related parties service agreement	0.4
12/19/2023	CSM	Meeting with E. Moraga (ILAP), O. Stephens, L. Muchnik (both GT), A. Lefkovits, N. Angelo (both Lazard), C. Sanchez, A. de la Barra (both AlixPartners) re: discuss related parties service agreement	0.4
<b>Total Professional</b>	Hours		0.8

Re:	<b>Business Operations</b>
Code:	20010151PA0002.1.11

PROFESSIONAL	RATE	HOURS	 FEES
Christopher Sanchez Montes de Oca	\$880/\$1,025	0.4	352.00
Alberto de la Barra	\$715/\$770	0.4	286.00
<b>Total Professional Hours and Fees</b>		0.8	\$ 638.00

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Re: Testimony Code: 20010151PA0002.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/26/2023	CSM	Call with S. Hoffman, L. Muchnik (both GT), C. Sanchez (AlixPartners) re: John	0.5
		Castellano's declaration	
<b>Total Profession</b>	nal Hours		0.5

Re:	Testimony
Code:	20010151PA0002.1.12

PROFESSIONAL	RATE	HOURS	FEES
Christopher Sanchez Montes de Oca	\$880/\$1,025	0.5	\$ 440.00
<b>Total Professional Hours and Fees</b>		0.5	\$ 440.00

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Re:Vendor ManagementCode:20010151PA0002.1.13

DATE	PROFESSIONAL	<b>DESCRIPTION OF SERVICES</b>	HOURS
11/30/2023	HK	Review vendor data to support communications activity for high-priority and	2.4
		critical vendors	
11/30/2023	HK	Review updated accounts payable data for payment tracking	3.4
11/30/2023	RCM	Correspond with colleagues on vendors and next steps	0.3
11/30/2023	RCM	Review communication materials for vendors	0.5
12/01/2023	HK	Review vendor data to support communications activity for high-priority and	3.3
		critical vendors	
12/05/2023	CSM	Participate in discussion with J. Sullivan (Epiq), C. Sanchez, H. Ku (both	0.2
		AlixPartners) re: company question re: noticing to vendors	
12/05/2023	HK	Participate in discussion with J. Sullivan (Epiq), C. Sanchez, and H. Ku (both	0.2
		AlixPartners) re: company question re: noticing to vendors.	
12/05/2023	RCM	Review correspondence on ordinary course professionals and next steps	0.3
12/11/2023	HK	Review open accounts payable data to support creditor review activity.	1.4
<b>Total Profession</b>	al Hours		12.0

Re:	Vendor Management
Code:	20010151PA0002.1.13

PROFESSIONAL	RATE	HOURS	FEES
Robb C McWilliams	\$1,220/\$1,380	1.1	\$ 1,342.00
Christopher Sanchez Montes de Oca	\$880/\$1,025	0.2	176.00
Hart Ku	\$805	10.7	8,613.50
<b>Total Professional Hours and Fees</b>		12.0	\$ 10,131.50

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Re:Executory ContractsCode:20010151PA0002.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/11/2023	НК	Review preliminary executory contract data.	1.3
<b>Total Profession</b>	al Hours		1.3

Re:	<b>Executory Contracts</b>
Code:	20010151PA0002.1.14

PROFESSIONAL	RATE	HOURS	FEES
Hart Ku	\$805	1.3	1,046.50
<b>Total Professional Hours and Fees</b>		1.3	\$ 1,046.50

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Re:Preparation for / Attend Court HearingsCode:20010151PA0002.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2023	ADB	Attend First Day Hearing	1.2
12/01/2023	CSM	Attend First Day Hearing	1.0
12/26/2023	ADB	Coordinate hearing attendance	0.1
01/01/2024	JRC	Review draft declaration for confirmation hearing.	0.5
01/02/2024	JRC	Review documents to prepare for confirmation hearing.	2.0
01/03/2024	ADB	Virtually attend Second Day and Plan Confirmation hearing	0.4
01/03/2024	JRC	Prepare for and attend confirmation hearing.	2.0
Total Profession	al Hours		7.2

Re:	Preparation for / Attend Court Hearings
Code:	20010151PA0002.1.17

PROFESSIONAL	RATE	HOURS	FEES
John Castellano	\$1,400/\$1,495	4.5	\$ 6,727.50
Christopher Sanchez Montes de Oca	\$880/\$1,025	1.0	880.00
Alberto de la Barra	\$715/\$770	1.7	1,237.50
<b>Total Professional Hours and Fees</b>		7.2	\$ 8,845.00

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Re:Retention Applications & Relationship DisclosuresCode:20010151PA0002.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/06/2023	BF	Revise draft AlixPartners' retention documents per counsel's comments	1.8
12/06/2023	KAS	Review updated retention documents from E. WooKee (GT) and B. Filler (AlixPartners)	1.3
12/06/2023	LP	Analyze the Schedule I in connection to the parties-in-interest for disclosure purposes	0.8
12/07/2023	BF	Revise draft AlixPartners' retention documents	1.2
12/07/2023	KAS	Review draft updated retention application, including additional disclosures	0.4
12/07/2023	LP	Draft disclosures for new parties received on December 7, 2023 to be included in retention documents	0.5
12/07/2023	RCM	Review correspondence on the D&O policy and next steps	0.3
12/07/2023	RCM	Review retention application received from counsel	1.3
12/10/2023	KAS	Review updated draft AlixPartners' retention documents from E. WooKee (GT)	0.3
12/11/2023	KAS	Review draft emails to investors re: potential relationship disclosures	0.3
12/11/2023	KAS	Review draft firmwide email distribution re: relationship disclosures	0.4
12/11/2023	RCM	Review additional updates and correspondence on the retention application	0.3
12/11/2023	RCM	Review updates on the relationship disclosures	0.2
12/12/2023	BF	Draft firmwide disclosures	2.6
12/12/2023	BF	Draft investor solicitation emails	0.4
12/12/2023	ESK	Finalize and issue investor emails re: disclosures	1.0
12/12/2023	KAS	Email to/from B. Filler (AlixPartners) re: firmwide email distribution	0.2
12/12/2023	KAS	Email to/from T. Brewer (AlixPartners) re: 90 day payment history detail	0.2
12/12/2023	KAS	Respond to U.S. Trustee inquiries re: AlixPartners' retention	0.3
12/12/2023	LP	Revise firmwide document based on comments from B. Filler (AlixPartners)	0.2
12/13/2023	ESK	Finalize and distribute firmwide email re: disclosures	1.0
12/13/2023	ESK	Meeting with K. Sundt, E. Kardos (both AlixPartners) re: U.S. comments to retention application	0.5
12/13/2023	ESK	Respond to employee emails re: disclosure matters.	0.5
12/13/2023	ESK	Review comments of U.S. Trustee to retention.	0.2
12/13/2023	KAS	Meeting with K. Sundt, E. Kardos (both AlixPartners) re: U.S. comments to retention application	0.5
12/13/2023	KAS	Respond to inquiries related to firmwide email re: relationship disclosures	0.3
12/13/2023	KAS	Respond to S. Hoffman (GT) re: correspondence with U.S. Trustee	0.2
12/13/2023	KAS	Respond to U.S. Trustee re: AlixPartners' retention application	1.7
12/13/2023	RCM	Correspond with colleagues on the retention application and next steps	0.3
12/18/2023	KAS	Correspondence with L. Prohaska, B. Filler (both AlixPartners) and E. WooKee (GT) re: additional parties-in-interest	0.4
12/18/2023	LP	Analyze connections to parties-in-interest for disclosure purposes	0.2
12/19/2023	KAS	Email response to E. WooKee (GT) re: supplemental declaration	0.1
12/19/2023	LP	Draft supplemental disclosures to be included in the Supplemental Declaration of	1.0

			-
		Robb C McWilliams of AlixPartners, LLP	
12/19/2023	LP	Draft supplemental disclosures to be included in the Supplemental Declaration of	2.9
		Robb C McWilliams of AlixPartners, LLP	
12/19/2023	LP	Prepare parties-in-interest list for firm database	1.0
12/19/2023	LP	Review parties-in-interest list for disclosure purposes	0.8
12/20/2023	LP	Draft supplemental disclosures to be included in the Supplemental Declaration of	2.9
		Robb C McWilliams of AlixPartners, LLP	

Re:	Retention Applications & Relationship Disclosures
Code:	20010151PA0002.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/20/2023	LP	Draft supplemental disclosures to be included in the Supplemental Declaration of	2.9
		Robb C McWilliams of AlixPartners, LLP	
12/20/2023	RCM	Review updated disclosure information	0.5
12/21/2023	RCM	Review updated disclosure information	0.3
01/03/2024	KAS	Correspondence with B. Filler (AlixPartners) re: retention hearing	0.2
<b>Total Profession</b>	al Hours		32.4

Re:

Code:

Inversiones Latin America Power Ltda. Calle Cerro El Plomo 5420 Of. 705 Santiago 7560000 Chile

Retention Applications & Relationship Disclosures 20010151PA0002.1.19

PROFESSIONAL	RATE	HOURS	FEES
Robb C McWilliams	\$1,220/\$1,380	3.2	\$ 3,904.00
Elizabeth S Kardos	\$800	3.2	2,560.00
Kaitlyn A Sundt	\$585/\$650	6.8	3,991.00
Brooke Filler	\$510	6.0	3,060.00
Lauren Prohaska	\$475	13.2	6,270.00
<b>Total Professional Hours and Fees</b>		32.4	\$ 19,785.00

Inversiones Latin America Power Ltda. Calle Cerro El Plomo 5420 Of. 705 Santiago 7560000 Chile

Re:Travel TimeCode:20010151PA0002.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2023	CSM	Travel from New York, NY to Boston, MA (return from Court hearing)	1.0
01/02/2024	JRC	Travel from Chicago, IL to New York, NY (Court Hearing)	3.0
01/03/2024	JRC	Travel from New York, NY to Chicago, IL (return from Court hearing)	3.0
<b>Total Profession</b>	al Hours		7.0

Re:	Travel Time
Code:	20010151PA0002.1.31

PROFESSIONAL	RATE	HOURS	FEES
John Castellano	\$1,400	6.0	\$ 8,970.00
Christopher Sanchez Montes de Oca	\$880	1.0	880.00
<b>Total Professional Hours and Fees</b>		7.0	\$ 9,850.00
Less 50% Travel Fees			 (4,925.00)
<b>Total Professional Hours and Fees</b>			\$ 4,925.00

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#### <u>Exhibit B</u>

Summary and Detailed Description of AlixPartners' Expenses

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#### **Alix**Partners

Inversiones Latin America Power Ltda. Calle Cerro El Plomo 5420 Of. 705 Santiago 7560000

Re:ExpensesCode:20010151PA0002.1.22

Date	Description	Amount
12/01/2023	Remote/Virtual Court Hearing Fee	70.00
12/19/2023	Individual Meal - Alberto De La Barra - Lunch	9.43
12/21/2023	Taxi/Car Service Alberto De La Barra Francisco bulnes correa 3763, las condes to Cerro el plomo 5680, las condes (travel to in-person client meeting)	10.22
01/02/2024	Lodging Christopher Sanchez Montes De Oca - The Lexington Hotel, New York, NY 2024-01-02 2024-01-04 (travel to in-person court hearing)	724.28
01/02/2024	Group Meal - with Client/Contact Christopher Sanchez Montes De Oca - Lunch - Christopher Sanchez Montes De Oca; John Castellano; Alberto De La Barra	164.98
01/02/2024	Individual Meal - John Castellano - Breakfast	16.83
01/02/2024	Individual Meal - John Castellano - Dinner	75.00
01/02/2024	Individual Meal - John Castellano - Lunch	19.36
01/02/2024	Internet Access John Castellano	8.00
01/03/2024	Individual Meal - John Castellano - Breakfast	16.98
01/03/2024	Individual Meal - John Castellano - Dinner	19.36
01/03/2024	Individual Meal - John Castellano - Lunch	15.67
01/03/2024	Taxi/Car Service John Castellano (travel to in-person client meeting)	22.50
01/03/2024	Taxi/Car Service John Castellano Hotel to Meeting (Travel to in-person team meeting)	56.62
01/03/2024	Taxi/Car Service John Castellano Airport to Meeting (Travel to in-person team meeting)	245.20
01/03/2024	Taxi/Car Service John Castellano Home to Airport (Travel to in-person court hearing)	128.41
01/03/2024	Internet Access John Castellano	8.00
01/04/2024	Taxi/Car Service Alberto De La Barra Office to Restaurant (travel to in- person client meeting)	5.27

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#### **Alix**Partners

Inversiones Latin America Power Ltda. Calle Cerro El Plomo 5420 Of. 705 Santiago 7560000

Re:ExpensesCode:20010151PA0002.1.22

Date	Description	Amount
01/04/2024	Individual Meal - Christopher Sanchez Montes De Oca - Lunch	24.10
01/04/2024	Taxi/Car Service Christopher Sanchez Montes De Oca Hotel to Court (travel to in-person court hearing)	52.53
01/04/2024	Lodging John Castellano - St. Regis New York, New York, NY 2024-01- 03 2024-01-04 (travel to in-person court hearing)	743.63
01/05/2024	Taxi/Car Service John Castellano Meeting to Airport (travel to in-person court hearing)	128.41
01/08/2024	Taxi/Car Service John Castellano Airport to Home (travel from in-person court hearing)	129.95

Total

\$ 2,694.73

Inversiones Latin America Power Ltda. Calle Cerro El Plomo 5420 Of. 705 Santiago 7560000

Client: 20010151Pa0002

Expenses	Amount
Court Solutions	\$ 70.00
Ground Transportation	779.11
Internet	16.00
Lodging	1,467.91
Meals	361.71
Total Disbursements	<u>\$ 2,694.73</u>

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#### Exhibit C

Certification of Robb C. McWilliams

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#### UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

INVERSIONES LATIN AMERICA POWER LTDA., *et al.*,<sup>1</sup>

Case No. 23-11891 (JPM)

Reorganized Debtors.

(Jointly Administered)

#### **CERTIFICATION OF ROBB C. McWILLIAMS**

I, Robb C. McWilliams, declare under the penalty of perjury as follows:

1. I am a Partner & Managing Director with AlixPartners, LLP ("<u>AlixPartners</u>"),<sup>2</sup> with offices at 2101 Cedar Springs Road, Suite 1100, Dallas, Texas 75201. AlixPartners serves as financial advisor to to the above-captioned debtors and debtors-in-possession (collectively, the "<u>Debtors</u>" or the "<u>Peeproprized Debtors</u>")

"<u>Reorganized Debtors</u>"),.

2. In compliance with the Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases, adopted January 29, 2013 (the "Local Guidelines"), and the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted June 11, 2013 (the "U.S. Trustee Guidelines"), I hereby certify as follows:

3. I have reviewed the Final Application of AlixPartners, LLP, Financial Advisor to the

<sup>&</sup>lt;sup>1</sup> The Debtors, together with each Debtor's Chilean identification number, are: Inversiones Latin America Power Ltda. (76.299.635-9); San Juan S.A. (76.319.883-9); and Norvind S.A. (76.919.070-8). The location of the corporate headquarters and the service address for Inversiones Latin America Power Ltda. is Cerro El Plomo 5680, Oficina 1202, Las Condes, Santiago, Chile.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Application.

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Chapter 11 Debtors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from November 30, 2023 through January 12,

2024 (the "Application").

- 4. As required by Section A.1 of the Local Guidelines, I certify that:
  - a) I have read the Application;
  - b) To the best of my knowledge, information and belief formed after reasonable inuiry, the fees and disbursements sought in the Application fall within the Local Guidelines;
  - c) The fees and disbursements sought are billed at rates and in accordance with practices customarily employed by AlixPartners and are generally accepted by AlixPartners' clients; and
  - d) In providing reimbursable services, AlixPartners does not make a profit on such service, whether the service is performed by AlixPartners in-house or through a third party.
- 5. In accordance with section B.2 of the Local Guidelines, given the short duration of

these Chapter 11 Cases and because interim approval or payment of the fees and expenses was not sought, AlixPartners did not provide a formal statement of AlixPartners' fees and disbursements to the Debtors for November (November 30, 2023), December (December 1–31), or January (January 1–12) prior to delivering this statement of fees and disbursements for the Final Period of November 30, 2023 through January 12, 2024.

6. I have reviewed Southern District of New York Bankruptcy Local Rule 2016(a) (the "<u>Rule</u>") and submit that the Application substantially complies with such Rule. In accordance with Federal Rule of Bankruptcy Procedure 2016(a) and section 504 of the Bankruptcy Code, no agreement or understanding exists between me, my firm or any professional thereof, on the one hand, and any other person, on the other hand, for the division of such compensation as my firm may receive from the Court herein, nor will any division of fees prohibited by section 504 of the Bankruptcy Code be

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made by me, or any attorney of my firm.

7. To the best of my knowledge, information and belief formed after reasonable inquiry,

the Application complies with the U.S. Trustee Guidelines.

8. I certify, under penalty of perjury, that the foregoing statements made by me are true to the best of my knowledge, information and belief.

Dated: January 31, 2024

/s/ Robb C. McWilliams Robb C. McWilliams Partner & Managing Director