

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

In re

Chapter 11

THE CENTER SPECIAL FOR SPECIAL NEEDS  
TRUST ADMINISTRATION, INC.

Case No. 8:24-bk-676-RTC

Debtor.

**APPLICATION OF UNDERWOOD MURRAY, P.A. FOR COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD  
FROM MARCH 4, 2024 TO SEPTEMBER 30, 2024**

1. Name of Applicant: Underwood Murray, P.A.
2. Services Provided to: Official Committee of Unsecured Creditors
3. Date of Retention: March 4, 2024 (ECF No. 76)
4. Period for this Application: March 4, 2024 to September 30, 2024
5. Date case filed: February 9, 2024 (Doc. No. 1)
6. Amount of Compensation Sought: \$ 300,138.50
7. Amount of Expense Reimbursement: \$ 213.01
8. Amount of Original Retainer: \$0 Current Balance: \$0
9. Blended Hourly Rate this Application: \$477.17
10. Cumulative: 629 hrs.
11. This is an: X interim \_\_\_ final application.
12. Disclose the following for each prior application: N/A

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THE CENTER SPECIAL FOR SPECIAL NEEDS  
TRUST ADMINISTRATION, INC.

Case No. 8:24-bk-676-RTC

**SUMMARY OF APPLICATION OF UNDERWOOD MURRAY, P.A. FOR  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES AS COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR THE PERIOD FROM MARCH 4, 2024 TO SEPTEMBER 30, 2024**

1. Name of Applicant: **Megan W. Murray and the law firm of Underwood Murray, P.A.**
2. Role of Applicant: **Attorney for the Official Committee of Unsecured Creditors**
3. Name of certifying professional: **Megan W. Murray, Esq.**
4. Date case filed: **February 9, 2024 (Doc. No. 1)**
5. Date of application for employment: **March 14, 2024 (Doc. No. 7)**
6. Date of order approving employment: **March 18, 2024 (Doc. No 76)**
7. If debtor's counsel, date of Disclosure of Compensation form: **N/A**
8. Date of this application: **September 13, 2024**
9. Dates of services covered: **March 4, 2024 to September 30, 2024<sup>1</sup>**
10. If case is chapter 7, amount trustee has on hand: ..... \$ **N/A**
11. Total fee requested for this period (from Exhibit 1).....\$**300,138.50**
12. Blended hourly rate for this period (from Exhibit 1).....\$**477.17**
13. Balance remaining in fee retainer account, not yet awarded .....\$**0**
14. Fees paid or advanced for this period, by other sources.....\$**0**
15. Net amount of fee requested for this period..... \$**0**
- Expenses:**
16. Total expense reimbursement requested for this period..... \$**213.01**
17. Balance remaining in expense retainer account, not yet received.....\$**0.00**
18. Expenses paid or advanced for this period, by other sources.....\$**0.00**
19. Net amount of expense reimbursements requested for this period .....\$**213.01**
20. Gross award requested for this period (#11 + #16)..... \$**300,351.51**
21. Net award requested for this period (#15 + #19)..... \$**300,351.51**
22. If Final Fee Application, amounts of net awards requested in interim applications but not previously awarded (total from History of Fees and Expenses, following pages):..... \$ **N/A**
23. Final fee and expense award requested (#15 + #19)..... **300,351.51**

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<sup>1</sup> Applicant reserves the right to file subsequent fee applications as necessary to supplement its request for actual time and costs expended.

History of Fees and Expenses

1. Dates, sources, and amounts of retainers received: None.
2. Prior fee and expense awards: None.

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**APPLICATION OF UNDERWOOD MURRAY, P.A. FOR COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD  
FROM MARCH 4, 2024 TO SEPTEMBER 30, 2024**

Megan W. Murray and Underwood Murray, P.A., (“**Underwood Murray**” or “**Applicant**”) having been approved by this Court as counsel for The Official Committee of Unsecured Creditors (“**Committee**”), apply for compensation for fees for services rendered and reimbursement of costs incurred in the Chapter 11 case for the period of March 4, 2024 to September 30, 2024.

This Application is filed pursuant to 11 U.S.C. §§ 330, 331 and Bankruptcy Rule 2016, and meets all the requirements set forth in the Guidelines incorporated in Local Rule 2016-1(B)(1). The exhibits attached to this application, pursuant to the Guidelines, are:

**Exhibit 1– Fee Application Summary Chart**

**Exhibit 2 – Summary by Professional**

**Exhibit 3 – Daily time records by activity code**

Applicant believes that the requested fees in the amount of \$300,138.50 for 629 hours (reflecting an average hourly rate of approximately \$477.17) worked is reasonable considering the twelve factors enumerated in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir.

1974), made applicable to bankruptcy proceedings by *In re First Colonial Corp. of America* 554 F.2d 1291 (5th Cir. 1977).

**I. RETENTION OF APPLICANT, DISCLOSURE OF COMPENSATION AND REQUESTED AWARD**

On March 21, 2024, the Court authorized Underwood Murray's retention (Doc. No. 99) as counsel to the Committee. Underwood Murray's compensation is conditioned on approval by this Court. Accordingly, Underwood Murray submits this Application for an interim award of professional fees and expenses incurred by Underwood Murray during the period from March 4, 2024 to September 30, 2024 (the "**Application Period**").

This Application is the first application filed in this case by Underwood Murray.

Underwood Murray seeks a total award of \$300,138.50 in fees for services rendered and \$213.01 for reimbursement of expenses incurred during the Application Period covered by this Application, for a total of \$300,351.51.

Section 331 of the Bankruptcy Code permits Applicant to seek approval of its fees "not more than once every 120 days after an order for relief is entered, or more if the Court permits." Applicant has not filed any other application during this 120-day period, therefore this Application is timely and appropriate.

**II. CASE BACKGROUND**

1. The Debtor filed for protection under Chapter 11 of the United States Bankruptcy Code on February 9, 2024 (the "**Petition Date**").

2. As the Debtor outlined in its Case Management Summary (Doc. No. 7), the Debtor's leadership discovered that approximately \$100,000,000 of funds from victims' trusts and the Debtor itself was loaned to Boston Financial Group ("**BFG**"), a group controlled by the Debtor's founder Leo Govoni ("**Govoni**"), which loan remains outstanding in the amount of

approx. \$150 million. See 8:24-ap-139-RTC (Doc. No. 23). The improper transfers of these funds have left over 1500 trust accounts either partially or fully compromised, which has made regular and full trust administration impossible for many victims.

3. Due to the nature of the case, the Committee was appointed by the United States Trustee (Doc. No. 75, 76, 87).

4. Shortly after such appointment of the Committee, the United States Trustee filed a Motion to appoint a Chapter 11 Trustee (Doc. No. 88), without opposition.

5. The Court held a hearing and approved the appointment of Michael Goldberg as Chapter 11 Trustee (See Doc. Nos. 93, 105, 109, 110).

6. The Committee convened and sought to appoint Megan W. Murray and the firm of Underwood Murray, P.A. as counsel to the Committee (see Doc. Nos. 96, 99). Accordingly, Underwood Murray has served as counsel to the Committee since March 4, 2024 (see Doc. No. 99, application was approved retroactive to March 4, 2024).

7. The unsecured creditors in this case are largely comprised of 2000+ beneficiaries of special needs trusts, many of whom have had their trusts compromised and their faith in those who they relied on destroyed. These are unsecured creditors are referred to throughout the case as “Beneficiaries” or “Victims.”

8. The Committee’s Application covers the period from March 4, 2024 to September 30, 2024, and includes employment of the Committee professionals, assistance with case management, attendance at 341 examination, assistance with communications with the Debtor’s 2000+ beneficiaries regarding case status updates and filing proofs of claims, working with the Debtor’s claim agent and generous volunteers (individuals and organizations) to ensure notice is provided to Beneficiaries regarding claims and estate issues, communications with the Chapter 11

Trustee and U.S. Trustee in the case to work collaboratively in the best interest of the Beneficiaries, attendance at hearings and coordination with the Committee on a regular basis to analyze and advance issues affecting the Beneficiaries, assessment and advancement of arguments in connection with the various class actions complaints and American Momentum Bank's requests for stay relief, analysis of the Debtor's executory contracts, business operations, and assistance to the Chapter 11 Trustee's efforts to find a replacement trustee and wind down the Debtor's trust administration operations.

9. All of the foregoing services rendered by Underwood Murray were performed for and on behalf of the Committee, which has worked to avoid duplication of resources with other professionals in the case.

### **III. DESCRIPTION AND SUMMARY OF SERVICES PERFORMED**

10. During the Application Period, Underwood Murray provided comprehensive services which were necessary to effectively represent the Committee in this case.

11. The specific services provided by Underwood Murray are detailed in the Underwood Murray billing records attached as **Exhibit 3**. Highlights of the services rendered by Underwood Murray on behalf of the Committee are set forth below. The following narrative is intended to serve only as a summary description of the services rendered by the undersigned Underwood Murray and the related benefits to the estate, as a result of Underwood Murray's efforts during its employment.

#### **a. Retention of Professionals**

12. As noted above, the Court authorized the appointment of the Committee on March 4, 2024 (Doc. No. 76).

13. The Committee convened and sought to appoint Megan W. Murray and the firm of Underwood Murray, P.A. as counsel to the Committee retroactive to March 4, 2024 (see Doc. No.

96). Underwood Murray prepared and filed its Application for Employment (Doc. No. 96), which was approved expeditiously (Doc. No. 99). Underwood Murray has provided services to the Committee since March 4, 2024.

**b. Committee Administration**

14. The Committee and its professionals meet on a regular basis to discuss critical issues affecting the victims in this case – the 2000+ Beneficiaries of the Debtor.

15. At the inception of the Committee, Applicant assisted the Committee set up governance documents and establish a process for communications. Applicant regularly communicates not only with the Committee members, but with Beneficiaries who seek information about the case. To advance these endeavors, Applicant has worked with the Debtor's claims agent, Epiq, to assist in the advancement of important information to the Beneficiaries through Epiq's website. Applicant worked to create an FAQ and develop a Committee page with additional information for Beneficiaries, which work remains ongoing.

16. Applicant has spent many hours with the Committee and the estate's Beneficiaries explaining the bankruptcy process, working with Beneficiaries to ensure they understand the claims process and the timelines related to this chapter 11 case, answering questions about their trusts and status of the wind down procedures. Clarity of the Beneficiaries' trust accounts is impacted by the complicated nature of the Debtor's transfers and accounting procedures.

17. Applicant also has also worked with the Chapter 11 Trustee to understand and ensure the Beneficiaries' remaining property in trust is protected.

18. Applicant and the Committee have had regular and frequent discussions with Chapter 11 Trustee and U.S. Trustee to ensure the estate's dwindling resources are allocated appropriately.



19. As can be expected with a case of this nature, Applicant has fielded calls from press regarding the case. Applicant also is working on processes to maximize recoveries for Beneficiaries that do not include overlapping litigation with the Chapter 11 Trustee, including setting up volunteer contribution channels and creative outlets to leverage recoveries.

**c. Class Action / Automatic Stay Litigation**

20. The Committee has had an instrumental role in analyzing the claims and litigation asserted by Class Counsel in the Chamberlin Class Action (8:24-cv-438), and negotiating with Class Counsel related to this proceeding and the Trustee's motion to enforce the automatic stay (See Doc. No. 195) ("**Stay Action**"). The Committee (on behalf of the Beneficiaries) and the Class (comprised of a portion of the estate's Beneficiaries for whom Applicant represents), have similar goals of maximizing recovery to their overlapping constituents at the least expense possible. Applicant has worked with Class Counsel and the Chapter 11 Trustee to advance this goal.

21. Applicant prepared for and attended numerous hearings on the Stay Action, which ultimately resulted in the Court's order granting the Trustee's Motion to Enforce Automatic Stay (Doc. No. 314).

22. Applicant also assisted Beneficiaries in obtaining stay relief to permit the move of new trust funds to a new trust administrator, without violating the automatic stay (see Doc. No. 229).

**d. Analysis of Business, Trust Issues, Replacement Trustee**

23. A significant portion of Applicant's time has been spent reviewing, revising, and considering the Beneficiaries' needs and rights regarding the wind down of the Debtor and the transfer of trusts to a new third party Trustee, CPT Institute ("**CPT**"). The Trustee and United

States Trustee identified CPT as a successor trustee shortly after the Chapter 11 Trustee's appointment; as the Chapter 11 Trustee noted "the Debtor does not deserve to be in the trust business."

24. Applicant has worked with the Committee and the Chapter 11 Trustee to understand CPT's ability to take on the Beneficiaries' various trusts. Applicant has spent hours with the Chapter 11 Trustee reviewing and revising various forms of agreements, motions, orders, and notices regarding the appointment of CPT to ensure the needs and rights of the Beneficiaries are met, and to ensure the process complies with applicable trust laws. This process has been challenging due to the nature of the various trusts at issue, the many states' laws involved, and the extent to which the trusts were compromised.

25. Applicant has also collaborated with the Chapter 11 Trustee to address nature and scope of the Debtor's business operations post-petition, including nature of employment of the CRO and individuals working with the Debtor, analysis of the Debtor's monthly operations and assessment of business needs, and analysis of resources available for distribution to the estates' professionals.

26. Applicant has worked with the Chapter 11 Trustee to assess the Beneficiaries' remaining trusts which remain intact at third party financial institutions and to ensure trust distribution procedures continue to benefit victims, including those with critical needs whose trusts were fully compromised.

27. With the recent filing of the "Wind Down Motion" (Doc. No. 346), Applicant has worked with numerous attorneys and individuals across the country to convene legal aid resources to assist Victims with their fiduciary choices. The Wind Down Motion provides that Beneficiaries can choose CPT as a successor trustee, or they may select any other trust fiduciary of their choice.

Many Victims may need assistance with this process, and Applicant has spent time advancing a process that will provide Beneficiaries with additional resources as the estate winds down.

**e. Adversary Proceedings and related litigation**

28. The Chapter 11 Trustee has regularly updated the Committee on its advancement of its adversary proceeding against Leo Govoni and BFG. Applicant has advised on these ongoing litigation efforts to the extent necessary to ensure Beneficiaries' rights and needs are met, without duplication of effort.

29. On occasion, Applicant has assisted the Committee investigate non-estate litigation that affects the estate and Beneficiaries' recoveries tangentially, including, e.g., the case involving The Directed Benefits. See e.g., Doc. Nos. 350, 351, 352. In May, 2024, the Florida Office of Attorney General filed a cause of action with case style Office of the Attorney General, Department of Legal Affairs v. The Directed Benefits Foundation, Inc., et al.; Case No. Case No.: 24-002321-CI in the Circuit Court in and for Pinellas County, Florida. Applicant has taken an active role in assessing third party actions which may have a direct impact on Beneficiaries' recoveries in this case, including where resources deployed by Govoni and BFG in those cases likely originated from Beneficiaries' trusts. See e.g., Doc. No. 352.

**INDEXING OF TASKS BY ACTIVITY CODES**

As set forth in the various exhibits attached to this Application, Underwood Murray has organized its time records by activity codes in accordance with the Guidelines. Accordingly, each of the time entries of the attorneys, paralegals and paraprofessionals of Underwood Murray has been indexed into one of the categories listed below.

**B110 Case Administration:** Coordination and compliance activities, including review of the Debtor's schedules and statement of financial affairs; general creditor inquiries; other tasks not otherwise indexed by activity code. **(\$17,928.50) (48.10 hours)**

**B120 Asset Analysis and Recovery.** Identification and review of potential assets including causes of action and non-litigation recoveries. **(\$28,883.50) (61.20 hours)**

**B130 Asset Disposition.** Sales, abandonment and transaction work related to asset disposition. **(\$1,305.00) (3.20 hours)**

**B140 Relief from stay / Adequate protection.** Matters relating to termination or continuation of automatic stay under 362 and motions for adequate protection. **(\$32,458.50) (64.20 hours)**

**B150 Meetings of and Communications with Creditors.** Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings (includes 2004 examination requests with alleged interested parties). **(\$117,536) (242.10 hours)**

**B160 Fee/Employment Applications:** Preparation of employment and fee applications for professionals; related tasks. **(\$6,945.50) (13.70 hours)**

**B190 Other Contested Matters.** Aanalysis and preparation of all other motions, opposition to motions and reply memoranda in support of motions. **(\$45,872) (92.20)**

**B210 Business Operations:** Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems. **(\$43,484) (90.20 hours)**

**B310 Claims Administration and Objections.** Specific claim inquiries; bar date motions; analyses, objections and allowances of claims. **(\$4,757) (11.20 hours)**

**B320 Plan and Disclosure Statement:** Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to the allowance and objections to allowance of claims. **(\$1,435.50) (2.90 hours)**

### **FIRST COLONIAL CONSIDERATIONS**

The requested fee of \$300,138.50 for 629 hours worked is reasonable considering the twelve factors enumerated in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Circuit 1974), made applicable to bankruptcy proceedings by *In re First Colonial Corp. of America*, 544 F.2d 1291 (5th Cir. 1977).

This Application presents the nature and extent of the professional services rendered by Underwood Murray in connection with its representation of the Committee. The recitals set forth in the daily time entries attached hereto constitute only a summary of the time spent. A mere reading of the time summary cannot completely reflect the full range of services Underwood Murray rendered and the nature of the issues and the pressures of time and performance which have been placed on Underwood Murray in connection with this case.

*American Benefit life Ins. Co. v. Baddock (In re First Colonial Corp.)*, 544 F.2d 1291 (5th Cir. 1977), *cert. denied*, 431 U.S. 904 (1977), enumerates twelve factors a bankruptcy court should evaluate in awarding fees. *First Colonial* remains applicable in the Eleventh Circuit to the determination of reasonableness of fees to be awarded under the Bankruptcy Code. *Grant v. George Schuman Tire & Battery Company*, 908 F.2d 874 (11th Cir. 1990); 2 *Collier on Bankruptcy* ¶ 330.05[2][a] at 330-33 through 330-37 (L. King 15th ed. 1991); *see also Bonner v. City of Prichard*, 661 F.2d 1206, 1209 (11th Cir. 1981).<sup>2</sup> The twelve factors are:

- i) The time and labor required;
- ii) The novelty and difficulty of the questions presented;
- iii) The skill required to perform the legal services properly;
- iv) The preclusion from other employment by the attorney due to acceptance of the case;
- v) The customary fee for similar work in the community;
- vi) Whether the fee is fixed or contingent;
- vii) The time limitations imposed by the client or circumstances;

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<sup>2</sup> In *Bonner v. City of Prichard*, 661 F.2d 1206, 1209 (11th Cir. 1981), the Eleventh Circuit Court of Appeals adopted as binding precedent all decisions the former Fifth Circuit handed down prior to the close of the business day on September 30, 1981.

- viii) The amount involved and results obtained;
- ix) The experience, reputation and ability of the attorneys;
- x) The undesirability of the case;
- xi) The nature and length of the professional relationship with the client; and
- xii) Awards in similar cases.

*First Colonial*, 544 F.2d at 1298-99.

Based on the standards set forth in sections 330 and 331 of the Bankruptcy Code and *First Colonial*, Underwood Murray believes that the fair and reasonable value of its services rendered during the period covered by this Application is in the amount of \$300,138.50.

**The Time and Labor Required:**

The time and labor required in the rendition of services to the Committee are reflected in Exhibit 2 to this Fee Application. Underwood Murray's professionals and paralegals devoted a total of 629 hours to providing services to the Committee for the period from March 4, 2024 to September 30, 2024. All attorneys and paralegals of Underwood Murray record the time expended in rendition of professional services in this case by recording a detailed description of the services rendered, and diligently attempting to avoid duplication of effort. Much of the work performed by Applicant has been performed out of the purview of the Court in Applicant's offices, but as this Court is aware, the Committee is effectively representing 2000+ Beneficiaries and their families, and it has taken an active role to ensure an open line of communication with victims during this very difficult time.

Applicant also has spent significant time working with the Chapter 11 Trustee to ensure the Beneficiaries' rights are adequately addressed and protected. While the Trustee has advanced level recovery efforts and moved to wind down the Debtor's estate, the Committee has assisted

with the nuanced Special Needs Trust needs of many of its constituents, and advocated for the Committee's constituents throughout the process. The collaboration of efforts will maximize recoveries to Beneficiaries.

**The Novelty and Difficulty of the Services Rendered:**

Megan W. Murray is primarily responsible for this matter and is an experienced bankruptcy practitioner. The professionals at Underwood Murray are well suited for the issues presented in this case, as its firm's attorneys regularly represent clients in complicated insolvency-related litigation and have extensive knowledge in the field. The firm also regularly represents clients in distressed situations and complicated bankruptcy and insolvency situations, which include Applicant's present clients and Beneficiaries in this case.

While challenging on many levels due to the unique nature of the Beneficiaries' loss combined with their special needs, this case is within Underwood Murray's usual repertoire, and its attorneys have represented sensitive creditors and other unsecured creditor committees. Notwithstanding the foregoing, the challenges in this case presented a unique dynamic for Applicant due to the delicate balance between a committee's usual role and the Committee's role here, which is Beneficiary-facing but not overlapping with the Chapter 11 Trustee's role.

**The Skill Requisite to Perform the Services Properly:**

To perform the services required in its representation of the Committee, legal skills and experience in the area of bankruptcy, real estate, corporate transactions, avoidance actions, fraud, trust and estate, probate law, and general civil litigation were required. Applicant has all of these skills and assisted the Committee and its Beneficiaries accordingly.

**Preclusion of Other Employment by the Professional Due to Acceptance of the Case:**

Underwood Murray did not turn away representation that was proffered during the Application Period, though it is inherent in doing work for the Committee that Applicant could not spend that same time on other pressing matters for other clients. Frequently throughout this case, Applicant was required to devote substantial resources to ensure the Committee's urgent legal needs were met.

**The Customary Fee:**

The rates charged by the attorneys providing services to the Debtor are well within the reasonable range for hourly rates charged by attorneys of comparable bankruptcy skills in the Middle District of Florida and have been awarded by this and other bankruptcy courts. Underwood Murray's blended hourly rate is \$477.17, which is reasonable in this market and appropriate in this case. All expenses charged have been documented and billed at the firm's customary rates for representations of this nature.

**Whether the Fee is Fixed or Contingent:**

Underwood Murray's compensation in this matter is contingent in that it is subject to the final approval of this Court and the availability of funds in the estate for payment of same.

**Time Limitations Imposed by the Client or Other Circumstances:**

At times, Underwood Murray was required to focus significant resources addressing urgent issues, addressing challenges affecting Beneficiaries and their trusts, preparing for deadlines and hearings before this Court.

**The Experience, Reputation, and Ability of the Professionals:**

Underwood Murray is an established, specialized commercial insolvency and distressed litigation firm having substantial experience in bankruptcy matters. Underwood Murray represents



clients throughout the State of Florida and appears regularly in the Middle District, Southern District and Northern District Bankruptcy Courts, and its attorneys are regular speakers, presenters, and authors on insolvency and litigation topics. Underwood Murray and each of its partners are “AV” rated by Martindale-Hubbell and are recognized by their peers in the state and across the country for expertise in their field. Underwood Murray and its attorneys have represented official committees of unsecured creditors as lead counsel in various chapter 11 cases including, without limitation, Senior Care Group, Inc. et al, 8:17-bk-06562 (Bankr. M.D. Fla.); ATIF, Inc., 2:17-bk-01712-FMD (Bankr. M.D. Fla.); BMR Holdings, LLC, 8:16-bk-02944-KRM (Bankr. M.D. Fla.) and All American Semiconductor, Inc., 1:07-bk-12963 (Bankr. S.D. Fla.) (special counsel).

The attorneys of Underwood Murray are experienced in matters of this kind and are well known to this Court, and have the knowledge, experience and skills necessary to handle the tasks performed and related services required in this case on behalf of the Beneficiaries.

**The Undesirability of the Case:**

This case is not undesirable, and Underwood Murray is honored to have the Committee and all 2000+ Beneficiaries entrust the firm with its serious legal needs such as those in this case.

**The Nature and Length of the Professional Relationship of the Client:**

Underwood Murray was appointed as attorney for the Committee retroactive to March 4, 2024 and it has continued to represent the Committee since this date.

**Awards in Similar Cases:**

The Bankruptcy Code, sections 11 U.S.C. §§ 330 and 331, provides that the extent of compensation to professionals shall be reasonable compensation that may be awarded to professionals based on the nature, the extent and value of such services, the time spent on such services, and the cost of comparable services in other cases under Title 11 of the United States

Code, and for the reimbursement of actual and necessary expenses incurred on behalf of the Debtor.

Applicant represents that the fees applied for are in conformity with the fees allowed in similar proceedings for similar services rendered and results obtained, especially considering the significance of this case both locally and nationally. The estate is comprised of Beneficiaries from nearly every state in the country. The hourly rates requested by Underwood Murray are the ordinary and usual hourly rates billed by Underwood Murray. During the Application period, there has been a need for fewer paralegal and administrative tasks, as compared to attorney resources advancing business issues relating to CPT transition, communicating with creditors and their counsel, analysis of the estate operations and cash flow, and strategic advancement of arguments affecting the Beneficiaries of this estate.

Applicant believes that the requested fees in the amount of \$300,138.50 for 629 hours (reflecting an average hourly rate of approximately \$477.17) worked is fair and reasonable and should be approved. Underwood Murray has conferred with the other professionals in this case and will agree to the same holdbacks it negotiated with these professionals: i.e., if approved, the Debtor shall be permitted to pay 100% of the reimbursable expenses and 50% of the fees for professional services approved by the Court. The remaining 50% of the fees for professional services approved will be paid by the Debtor when sufficient funds become available, subject to further Court order and approval of this Application on a final basis.

### **CONCLUSION**

**WHEREFORE**, Underwood Murray seeks (1) interim approval of fees in the amount of \$300,138.50 and costs in the amount of \$213.01 for the period of March 4, 2024 to September 30,

2024, for a total of \$300,351.51, and (2) such other and further relief as the court deems just and appropriate.

Dated: October 18, 2024.

Respectfully submitted,

s/ Megan W. Murray

Megan W. Murray  
Florida Bar Number 0093922  
Scott A. Underwood 730041  
Florida Bar Number  
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*Counsel for the Committee*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of the foregoing, which was filed with the Clerk of Court, has been furnished electronically to those parties registered to receive service via CM/ECF, on October 18, 2024, including the United States Trustee, who is registered to receive electronic notices in this case.

/s/ Megan W. Murray

Megan W. Murray

# **EXHIBIT 1**

**Summary of Requested Reimbursements of Fees:  
as Counsel for the Jointly Administered Debtors**

<b>Attorney Name</b>	<b>Total Hours Per Attorney</b>	<b>Effective Hourly Rate</b>	<b>Total Amount Per Attorney</b>
Scott Underwood	79.90	625.00	49,937.50
Megan Murray	423.90	495.00	209,830.50
Adam Gilbert	13.60	350.00	4,760.00
Melissa Sydow	39.70	315.00	12,505.50
Daniel Etlinger	44.80	425.00	19,040.00
<b>Totals</b>	<b>601.90</b>		<b>\$ 296,073.50</b>
Attorneys Blended Hourly Rate		\$ 491.90	
<b>Paralegal / Paraprofessional Name</b>	<b>Hours Per Paralegal</b>	<b>Effective Hourly Rate</b>	<b>Total Amount Per Paralegal</b>
Jamie Patterson	27.10	150.00	4,065.00
<b>Totals</b>	<b>27.10</b>		<b>\$ 4,065.00</b>
Paralegal Blended Hourly Rate		\$ 150.00	
<b>Total Attorneys and Paralegals</b>	<b>629.00</b>		<b>\$ 300,138.50</b>
Combined Blended Hourly Rate		\$ 477.17	
Costs			\$213.01
<b>TOTAL</b>	<b>629.00</b>		<b>\$ 300,351.51</b>

## **EXHIBIT 2**

Date	User	Work Type	Description	Billable	Rate	Total
				629.00		300,138.50
3/15/2024	Megan Murray	B110	Advise on internal documentation process (.5)	0.50	495.00	247.50
3/18/2024	Megan Murray	B110	Address NOAs in case.	0.10	495.00	49.50
3/20/2024	Daniel Etlinger	B110	Draft 2004 requests, and, conferences and email correspondences with Megan Murray and Scott Underwood re same.	4.70	425.00	1,997.50
3/21/2024	Daniel Etlinger	B110	Revise 2004 requests, finalize and file.	0.20	425.00	85.00
3/22/2024	Daniel Etlinger	B110	Draft motion pursuant to sections 1102 and 1103 to clarify solicitation and information dissemination requirements (2.0). Draft limited objection to trust motions and email correspondence with Megan Murray re same (.5).	2.50	425.00	1,062.50
3/22/2024	Megan Murray	B110	Communication with (.1) and call M Goldberg and S Wirth re next steps, reporting, etc. (.8)	0.90	495.00	445.50
3/22/2024	Megan Murray	B110	Address revisions to 1102 Motion, Objection to upcoming motions (.5) consider EPIQ issues and noticing of Claims Date, Class Action, Strategy re same (.7)	1.20	495.00	594.00
3/25/2024	Daniel Etlinger	B110	Advance draft of FAQ for Committee's landing page (1.0). Revise limited objection and file same (.2).	1.20	425.00	510.00
3/26/2024	Daniel Etlinger	B110	Add an additional FAQ and email correspondence with Megan Murray re same.	0.20	425.00	85.00
3/27/2024	Jamie Patterson	B110	Created binder index for hearing on 3.28	0.40	150.00	60.00
4/2/2024	Daniel Etlinger	B110	Analyze Nperspective March invoice (.3), analyze February MOR (.4) and email correspondences with Megan Murray re same (.2).	0.90	425.00	382.50
4/8/2024	Jamie Patterson	B110	Prepared binder index for hearing on 4.15	0.70	150.00	105.00
4/12/2024	Megan Murray	B110	Call with S Wirth (.7) communications with creditors to discuss Gov IDs (2.8) communications re Class Action (.4) prep for hearing (.2) advancement of calls for Legal Aid Clinis (.3) call T Dorr (.3)	4.70	495.00	2,326.50
4/16/2024	Jamie Patterson	B110	Calls to clinics in GA and HI to inquire pro bono capacity	1.80	150.00	270.00
4/16/2024	Megan Murray	B110	Review and address continuation of cash management and bank account orders (.2) communications re Trusts with Committee (.2)	0.40	495.00	198.00
4/17/2024	Jamie Patterson	B110	Called and emailed clinics nationwide to inquire into their ability to assist creditors with proof of claim forms	5.20	150.00	780.00
4/24/2024	Jamie Patterson	B110	Continued calling clinics nationwide to inquire into their ability to assist with proof of claim forms	2.30	150.00	345.00
5/4/2024	Scott Underwood	B110	Correspond re POC Video, Q&A from UM (.3)	0.30	625.00	187.50
5/6/2024	Jamie Patterson	B110	Updated spreadsheet with clinic responses	0.20	150.00	30.00
5/7/2024	Daniel Etlinger	B110	Analyze POC call log and email correspondences re developing same (.2). Analyze and email correspondences with Megan Murray re Andrew Richards state court order (.2). Draft proof of claim script (1.3).	1.70	425.00	722.50
5/13/2024	Daniel Etlinger	B110	Draft limited objection to trust procedures.	0.50	425.00	212.50
5/13/2024	Megan Murray	B110	Review and revise Motion for Standing Request for Copies and approve same for filing (.1) Review and revise Limited Objection to Trust Procedures (.2) and email S Wirth re Same (.1) coordination of additional meeting with Committee re Trust Procedures and Motion re Stay Relief (.2)	0.60	495.00	297.00
5/16/2024	Daniel Etlinger	B110	Email communications with Megan Murray re limited objection to trust administration and potential demand letter and revise per same (.4). Conference with Megan Murray re same and transition materials (.3).	0.70	425.00	297.50
5/16/2024	Megan Murray	B110	Review and revise trust procedures motion (.3)	0.30	495.00	148.50
5/21/2024	Daniel Etlinger	B110	Email correspondence with Megan Murray re call tracker, limited objection, POC walkthrough and weekly disclosure requests.	1.00	425.00	425.00
5/22/2024	Daniel Etlinger	B110	Call with Megan Murray re case updates, DOJ meetings, script, stay relief motion and clawback.	0.10	425.00	42.50

5/22/2024	Scott Underwood	B110	Correspondence regarding manner in which to work cooperatively between Trustee and Committee, including types and timing of reporting.	0.10	625.00	62.50
5/30/2024	Jamie Patterson	B110	Prepared binder index for court hearing scheduled for 6/4	0.60	150.00	90.00
6/10/2024	Jamie Patterson	B110	Created binder index for hearing on June 14	0.80	150.00	120.00
6/10/2024	Jamie Patterson	B110	Called Zoom and Nextiva to learn about firm's ability to have a call with 500 participants	1.40	150.00	210.00
6/10/2024	Megan Murray	B110	Address dropbox with Raye Elliott	0.20	495.00	99.00
6/16/2024	Megan Murray	B110	Preprepare for call with KM (1) and call re AMB Bank accounts and Call with CRO (.5)	1.50	495.00	742.50
6/20/2024	Megan Murray	B110	Call S wirth re Insurance, NDAs, other matters (.3) review confi line items (.2)	0.50	495.00	247.50
6/20/2024	Megan Murray	B110	Discussions with Class Action counsel re post hearing communications, order, and timing of briefing (.4)	0.40	495.00	198.00
6/25/2024	Megan Murray	B110	Communcate with Trustee re Sixth Interim Order	0.10	495.00	49.50
6/25/2024	Megan Murray	B110	Communicate with committee, Trustee, T Dorr re Broadleaf and T Bales	0.40	495.00	198.00
7/2/2024	Megan Murray	B110	Communications w/ Emma Hemness re contributions for beneficiaries.	0.20	495.00	99.00
7/16/2024	Daniel Etlinger	B110	Research bankruptcy court's powers to authorize omnibus successor trustee provisions.	1.80	425.00	765.00
7/22/2024	Megan Murray	B110	Review docket, agenda, prepare for hearing items set for 7/23 other than stay issues.	0.70	495.00	346.50
8/15/2024	Megan Murray	B110	Strategy / list of questions to S Wirth re advancement of topics and issues, collection of funds, CPT, directed benefits (.3) review final order on MSJ, related emails (.2)	0.50	495.00	247.50
8/30/2024	Megan Murray	B110	Email to R Elliott re deceased beneficiary Trusts.	0.10	495.00	49.50
9/6/2024	Jamie Patterson	B110	Created binder index for hearing on 9.9.24	0.60	150.00	90.00
9/10/2024	Megan Murray	B110	Prepare for and attend status conference, discussion with DOJ afterwards.	1.50	495.00	742.50
9/15/2024	Melissa Sydow	B110	Strategize re: collection of NDA for committee to execute.	0.10	315.00	31.50
9/25/2024	Megan Murray	B110	Revise and approve certificate of service on Order Shortening Time	0.10	495.00	49.50
9/27/2024	Megan Murray	B110	Call with NALA and APT regarding trust options, assistance with Opt Outs (1.7) follow up email to group re agenda, next steps, planning meetings (.4) review spreadsheet by state to address larger state optiosn (.1) email to Kevin / Steve W re same for Motion (.1) Email Epiq re website agenda (.2) additional emails to Hannah (Nala) re presentation (.4) address discovery from Trenam and PFS re Ozk (.4) Several conferences regarding case background, possible recoveries, history, and chapter 11 trustee with T. Dorr (.2, .1), D. Kirk (.2, .1) M. Murray (.4); and possible candidates for trustee or counsel (.2, .2, .4);	3.20	495.00	1,584.00
3/12/2024	Scott Underwood	B120	Analysis of case background, trust processes, and discovery for overall planning on asset recovery in the long term.	1.80	625.00	1,125.00
3/18/2024	Scott Underwood	B120	Review HWH disclosure (.1); conference with P. Mosley regarding HWH involvement background and general understanding of how the loan process worked and pooling of funds was orchestrated (1.0); advance analysis of Arena Finance complaint (.4); related correspondence (.3).	0.60	625.00	375.00
3/20/2024	Scott Underwood	B120	Conferences with D. Kirk and M. Murray regarding chapter 11 trustee and recovery actions (.1, .2);	1.80	625.00	1,125.00
3/22/2024	Scott Underwood	B120	Attend meeting with Trustee and counsel regarding strategy and recovery plan.	0.30	625.00	187.50
3/22/2024	Scott Underwood	B120	Call with S Wirth re Reservation of Rights (.2) review and finalize Lim.Objecton and ROR re bank accounts and trust process (.5)	0.80	625.00	500.00
3/25/2024	Megan Murray	B120		0.70	495.00	346.50



3/26/2024	Scott Underwood	B120	Conferences with S. Wirth (.3) and M. Murray regarding next steps of coordination amongst committee and trustee to maximize recovery and minimize expense (.3); related correspondence (.3).	0.90	625.00	562.50
3/28/2024	Scott Underwood	B120	Conference with J. Markowitz regarding Miami proceeding (.2); conference with S. Wirth regarding case and next steps for trustee/committee integration (.2); related correspondence (.2).	0.60	625.00	375.00
4/5/2024	Megan Murray	B120	Address communications and strategy re Class Action	0.30	495.00	148.50
4/10/2024	Scott Underwood	B120	Analysis of recent suits, asset recovery areas, and advise regarding upcoming trustee meeting and these topics, including related correspondence.	0.70	625.00	437.50
4/19/2024	Daniel Etlinger	B120	Analyze class action lawsuits and begin research re standing.	1.50	425.00	637.50
4/19/2024	Scott Underwood	B120	Analysis of further fraud details and assess possible claims impact for estate vs non-estate claims (.4);	0.40	625.00	250.00
4/22/2024	Daniel Etlinger	B120	Continue researching and drafting brief re trustee standing.	3.00	425.00	1,275.00
4/29/2024	Daniel Etlinger	B120	Analyze trustee's adversary complaint, motion to enforce stay and conference with Megan Murray re same and next steps.	1.00	425.00	425.00
5/23/2024	Daniel Etlinger	B120	Email correspondences with Megan Murray re best potential avenue for litigation recoveries.	0.20	425.00	85.00
5/29/2024	Daniel Etlinger	B120	Analyze Charles Schwab production and email correspondence with Megan Murray re same.	0.10	425.00	42.50
5/29/2024	Megan Murray	B120	Address ME Property and recovery efforts with S Wirth and Committee members (.6)	0.60	495.00	297.00
5/29/2024	Megan Murray	B120	Callw ith Committee (1.5) call with S Wirth / Goldberg and Class Counsel re continued negotiations (1) follow up straegy (.3) address Motion for turnover of FTAS (.4) and related communications (.2)	2.50	495.00	1,237.50
5/30/2024	Megan Murray	B120	Communications regarding T Bales, Maine Property (.4) call to Committee Member regarding case issues, getting Trust docs (.5) related communications with S Wirth re same (.2)	1.10	495.00	544.50
6/7/2024	Megan Murray	B120	Email with beneficiary re successor trustee for beneficiary matter in state court. (.1)	0.10	495.00	49.50
6/7/2024	Megan Murray	B120	Call with S Wirth about catch up items, call with S Kapila, status of insurance recoveries	0.50	495.00	247.50
6/8/2024	Megan Murray	B120	Review answers, email Committee re same regarding summary judgment, admission to defaults (.6) review NOA by Edward Peterson(.1)	0.60	495.00	297.00
6/10/2024	Scott Underwood	B120	Conference with Trustee and his FA regarding trust accounting status (.7); advance follow up steps following the same (.2);	0.90	625.00	562.50
6/11/2024	Daniel Etlinger	B120	Email correspondences with Megan Murray re AMB production.	0.10	425.00	42.50
6/11/2024	Megan Murray	B120	Set up call re GoFundMe	0.20	495.00	99.00
6/13/2024	Scott Underwood	B120	Attend committee zoom call with Trustee and counsel (2.0); follow up steps and prepare for hearing argument on stay relief (.4); attend zoom meeting with counsel specifically for hearing preparation and discussion of open items that may come up at the hearing (.9); conference with Committee Member regarding the foregoing (1.0); further advance hearing preparation (.4); related correspondence (.4).	5.10	625.00	3,187.50
6/14/2024	Daniel Etlinger	B120	Conference call with task force re potential volunteer contribution vehicle.	0.70	425.00	297.50
6/17/2024	Daniel Etlinger	B120	Access and analyze Relativity site and internal email communications re same.	0.20	425.00	85.00
6/25/2024	Daniel Etlinger	B120	Begin analyzing AMB production.	1.00	425.00	425.00

6/26/2024	Daniel Etlinger	B120	Spotcheck additional AMB production and email communications with Megan Murray re same.	0.30	425.00	127.50
6/27/2024	Scott Underwood	B120	Analysis of Govoni asset inquiries.	0.20	625.00	125.00
6/28/2024	Megan Murray	B120	Review information regarding "tails policies" and communicate with SWirth re same (.3) communicate with Committee re same (.1) brief re view contracts with client for T Bales property work (.4)	0.40	495.00	198.00
7/1/2024	Adam Gilbert	B120	Review public records related to Central Properties Inc. and email SAU and MWM re: findings (1.2). Email MWM re: appraisal for central properties transfer (.3).	1.50	350.00	525.00
7/1/2024	Jamie Patterson	B120	Reviewed Bales' invoices for January-July to calculate how much was charged per month	1.60	150.00	240.00
7/1/2024	Scott Underwood	B120	Analysis of assets and property transfers related to the Center and insiders.	0.30	625.00	187.50
7/7/2024	Megan Murray	B120	Review and update FTAS request for turnover, review MOR in connection with same and overall MOR review	0.50	495.00	247.50
7/8/2024	Daniel Etlinger	B120	Draft discovery analysis memo to Megan Murray.	3.00	425.00	1,275.00
7/9/2024	Megan Murray	B120	Advance Relativity access and AMB production (.2)	0.20	495.00	99.00
7/10/2024	Daniel Etlinger	B120	Email correspondences with Megan Murray and Raye Elliott re Tom Bales' follow ups.	0.20	425.00	85.00
8/7/2024	Scott Underwood	B120	Review and comment on most recent version of note case SJ order.	0.20	625.00	125.00
8/8/2024	Megan Murray	B120	Communicate with Michelle Gilbert re escrow account (.2)	0.20	495.00	99.00
8/13/2024	Megan Murray	B120	Address AMB other discovery ingestion	0.20	495.00	99.00
8/15/2024	Scott Underwood	B120	Review and correspondence regarding final form of note SJ order.	0.20	625.00	125.00
8/20/2024	Melissa Sydow	B120	Compose email to Michelle Gilbert Garcia re: escrow agreement.	0.10	315.00	31.50
8/22/2024	Melissa Sydow	B120	Conference call with Michelle Gilbert re: escrow account for donations (.3) call with Attorney General's office re: Directed Benefits and our case (.2)	0.50	315.00	157.50
8/22/2024	Scott Underwood	B120	Analysis of revised injunction in Directed Benefits that granted liens on potential assets.	0.40	625.00	250.00
8/23/2024	Melissa Sydow	B120	Review First Amended Temporary Injunction to prepare for call with AG.	0.40	315.00	126.00
8/23/2024	Melissa Sydow	B120	Correspond via email with Attorney General's office re: call to discuss status of Directed case.	0.20	315.00	63.00
8/27/2024	Melissa Sydow	B120	Call with Associate Deputy Attorney General re: communication and plans for CNSTA matter (.4) review pleadings of docket of Big Brewery case (1.1) follow up calls and emails with Megan Murray re: forgoing (.5) review email and attachments from beneficiary re: escrow agreement (.4)	2.40	315.00	756.00
9/3/2024	Scott Underwood	B120	Analysis and correspondence with Trustee regarding recent sales, settlements, and asset/lien transfer with possible impact on SJ recovery.	0.40	625.00	250.00
9/5/2024	Jamie Patterson	B120	Researched various properties to determine current and past owners	1.70	150.00	255.00
9/5/2024	Megan Murray	B120	Prepare for (.2) and attend Meeting with M Goldberg re discovery issues, advancement of all matters (1) , review subpoena chart and follow up correspondence re same (.5) advance research on property subject to liens / AG Wenk dispute (.4)	2.10	495.00	1,039.50
9/5/2024	Scott Underwood	B120	Continued analysis of and correspondence regarding responses and discovery for various known settlements and issues with pushing estate recovery efforts pace, including status of KM analysis.	0.50	625.00	312.50

9/6/2024	Melissa Sydow	B120	Review various organizations involving collection of attorneys from across the country who practice in the area of special needs, including special needs trusts to prepare for call with Mark Munson re: same (.3) strategize re: tracking of subpoenas and other issues currently pending with Trustee (1.3)	1.60	315.00	504.00
9/11/2024	Megan Murray	B120	Finalize 2004 exam with M to Shorten Time and add BFG to same (1.3)	1.30	495.00	643.50
9/12/2024	Scott Underwood	B120	Attend conference with Trustee and KM regarding status of forensic analysis and next steps.	0.90	625.00	562.50
9/13/2024	Daniel Etlinger	B120	Analyze escrow package and email correspondence with Megan Murray and Melissa Sydow re same.	0.50	425.00	212.50
9/13/2024	Jamie Patterson	B120	Researched KY property appraiser sites for information on property owners and sales and then sent attorney the details	1.00	150.00	150.00
9/13/2024	Melissa Sydow	B120	Review correspondence from Committee re: interviews with Center employees today and strategize re: interviews (.7) strategize re: next steps after conclusion of interviews (.5) Emergency Motion to Shorten Time to Five Days to Respond to Request for Production (.9)	2.10	315.00	661.50
9/14/2024	Jamie Patterson	B120	Organized parcel search information for attorney	0.40	150.00	60.00
9/14/2024	Megan Murray	B120	Significant edits re Motion to Shorten Discovery; 2004 notices and subpoena with review of state court records, federal AP docket, related real estate proper records, follow up strategy w/ MJS re same	4.50	495.00	2,227.50
9/16/2024	Melissa Sydow	B120	Review and exchange correspondence with Akerman re: Relativity access to review production (.5)	0.50	315.00	157.50
9/19/2024	Jamie Patterson	B120	Reviewed and scheduled document production- docket #350/351	0.10	150.00	15.00
9/25/2024	Daniel Etlinger	B120	Analyze memo re revisions to escrow package.	0.10	425.00	42.50
9/25/2024	Megan Murray	B120	Address E Discovery requests, obtaining additional information for review in connection with Committee's concerns about Govoni's use of funds with Beneficiary assets, advancing claims against AMB.	0.40	495.00	198.00
9/25/2024	Megan Murray	B120	Email Rich McIntyre re Meeting to discuss Brewery idea to recovery funds (.1)	0.10	495.00	49.50
9/27/2024	Daniel Etlinger	B120	Revise escrow package and email correspondence with Megan Murray re same.	1.00	425.00	425.00
9/27/2024	Megan Murray	B120	Call and email to J Shifino re case discovery	0.20	495.00	99.00
9/30/2024	Scott Underwood	B120	Review and analysis, including correspondence with Trustee counsel, regarding Govoni/brewery settlement, SJ motion to quantify note claim, and employee ties to Govoni.	0.50	625.00	312.50
6/26/2024	Megan Murray	B130	Review filing of Landvest Broker (.2) Advance issues with Maine Property (.3)	0.50	495.00	247.50
7/1/2024	Adam Gilbert	B130	Email MWM re: land appraisal (.3) and review Maine property appraisal (.3)	0.60	350.00	210.00
7/3/2024	Adam Gilbert	B130	Continue to review ME property appraisal (.4) and email MWM re: proposed sale of property (.2)	0.60	350.00	210.00
7/9/2024	Daniel Etlinger	B130	Conference call with Tom Bales re work with the debtor.	1.00	425.00	425.00
8/1/2024	Daniel Etlinger	B130	Analyze and comment on motion to approve CPT management agreement and asset transfer agreement.	0.50	425.00	212.50
3/19/2024	Megan Murray	B140	Communications with D Kirk (AMB) re Center complaint issues.	0.20	495.00	99.00
4/22/2024	Megan Murray	B140	Strategy re Motion for Rellief from Stay with SAU (.2) call with S Wirth re ClassAction (.5) review Class Action's stay motion (.2) Communicate with D Ferguson re same(.1)	1.00	495.00	495.00
4/23/2024	Megan Murray	B140	Review, revise / comments on stay relief motion, including review of case law related ot same (2.7)	2.70	495.00	1,336.50
5/1/2024	Scott Underwood	B140	Analysis of stay relief and trust transfer issues and strategy for the same (.6);	0.60	625.00	375.00
5/8/2024	Megan Murray	B140	Review and revise M for S Relief (1.3)	1.30	495.00	643.50

5/9/2024	Megan Murray	B140	Call with Committee regardign M Stay Relief (1.8) draft stay relief motion (1.5) advance Motion to Modify Trust Procedures (.2)	3.50	495.00	1,732.50
5/9/2024	Megan Murray	B140	Draft Stay Relief Motion	1.20	495.00	594.00
5/10/2024	Megan Murray	B140	Reviewand consider implications of M re Briefing Schedules (.1)	0.10	495.00	49.50
5/12/2024	Megan Murray	B140	Review scheduling motion (.1) email Committee re same (.1) review AM Bank's limited objection (.3) review and respond to FL Bar committee re Elder Law legislation (.1)	0.60	495.00	297.00
5/12/2024	Megan Murray	B140	Email Committee re Motoin /Stay	0.20	495.00	99.00
5/14/2024	Scott Underwood	B140	Review and analysis of objection of Bank to stay enforcement motion (.3) and develop possible strategies regarding the same (.7); analysis of and review draft response to stay enforcement motion to class counsel (.5);	1.50	625.00	937.50
5/15/2024	Scott Underwood	B140	Analyze stay relief/enforcement issues concerning class action and AMB motion (.4);	0.40	625.00	250.00
5/21/2024	Megan Murray	B140	Call with M Goldberg/S Wirth re Class Action Stay Motion (1.2) call with Class Action Counsel regarding claim splitting, derivative vs direct and stay action (1.5) follow up call with S Wirth (.5) revisions to stay motion with Committee member, S Wirth, related correspondence regarding same (.6)	3.80	495.00	1,881.00
5/22/2024	Megan Murray	B140	Address expedited hearing on 5/23 with Court for Stay relief and notice of hearing on same, email service to UST and S Wirth (.4) call with D Etlinger re trust matters, alternative solutions (.2) address demand letter to FTAS (.2)	0.80	495.00	396.00
5/24/2024	Scott Underwood	B140	Further analysis and strategy regarding nuances of possible cooperation agreement/stay order for class counsel (.4);	0.40	625.00	250.00
5/28/2024	Megan Murray	B140	Review and revise order on Stay Motion (.4) and circualte with comment (.1) review and provide edits on transition agreement (1.4) email S Wirth (.1) and Committee re same (.1)	2.10	495.00	1,039.50
5/31/2024	Megan Murray	B140	Reivew and revise stay motion (.4) and communicate with trsutee and class counsel on same, (.1) review and address stay deadlines (.1)	0.30	495.00	148.50
6/1/2024	Megan Murray	B140	Communications to Committee and Trustee re Class Action compormise on stay motoion	0.70	495.00	346.50
6/5/2024	Scott Underwood	B140	Analysis of Big Storm lawsuit (.4); analysis of order scheduling stay motion (.2); correspondence regarding the foregoing (.5).	1.10	625.00	687.50
6/6/2024	Megan Murray	B140	Strategy re upcoming hearing, address issues related to Class Action meetings and stay motion.	0.40	495.00	198.00
6/6/2024	Scott Underwood	B140	Conferences with S. Wirth regarding stay motion and draft order (.1, .2, .3); advance issues regarding the same with committee (.5); initial review of objection of Committee on stay motion (.4); review and comment on draft order (.2); related correspondence (.5).	2.20	625.00	1,375.00
6/7/2024	Megan Murray	B140	Address motion / hearing status on Motion to Stay (.1), review Class Counsel objection (.5)	0.60	495.00	297.00
6/10/2024	Megan Murray	B140	Communicate with Committee member, M Goldberg re meeting (.3) and T Dorr re outstanding Stay Motion (.1)	0.40	495.00	198.00
6/11/2024	Megan Murray	B140	Correspondence re Stay Relief Order and revision to same	0.20	495.00	99.00
6/14/2024	Scott Underwood	B140	Prepare for hearing and argument on stay relief issues (2.5); conference with S. Wirth regarding the same (.4); attend hearing on the same and meeting following the same with counsel for trustee and class plaintiffs (2.2); follow up conference with Trustee and counsel after hearing (.7);	5.80	625.00	3,625.00
6/26/2024	Megan Murray	B140	Comunicate with J Streisfeld re meeting on stay motion	0.10	495.00	49.50
7/9/2024	Megan Murray	B140	Advance stay motion briefing (.1)	0.10	495.00	49.50

7/11/2024	Adam Gilbert	B140	Call with SAU re: overview of pending stay relief issue and needed research (.5). Research application of 362(a) for use in supplemental brief (6.4)	6.90	350.00	2,415.00
7/11/2024	Megan Murray	B140	Review AMB stay relief motion and consider response (.2) work on stay relief response (3.5)	3.70	495.00	1,831.50
7/11/2024	Scott Underwood	B140	Analysis of, further refine argument theme and structure outline, advance related research and draft first summary of argument (2.8); review and analysis of initial/partial research results (.6); related correspondence (.3).	3.70	625.00	2,312.50
7/12/2024	Adam Gilbert	B140	Continue to work on research for supplemental brief re: 362(a)(3)	2.20	350.00	770.00
7/12/2024	Megan Murray	B140	Advance work on Response to stay motion with various calls, drafting and related research to finalize (4.5) related communications with Trustee (.3)	4.70	495.00	2,326.50
7/18/2024	Megan Murray	B140	Review class action response to Trustee's Reply Reserach claims in case and address issues with SAU and S Wirth on multimple calls and emails related to AMB Motion for Stay Relief (.7) revisons to Center's response to AMB Motion (2.5) review Trustee response and communicate re same(.5)	0.30	495.00	148.50
7/19/2024	Megan Murray	B140	Finalize and file response to AMB Motion	3.70	495.00	1,831.50
7/20/2024	Megan Murray	B140		0.40	495.00	198.00
7/22/2024	Daniel Etlinger	B140	Analyze Committee and Trustee's responses to AMB motion for stay relief (.2) and analyze Trustee's MSJ in adversary (.2).	0.40	425.00	170.00
7/22/2024	Megan Murray	B140	Calls to address stay issues and upcoming hearing on same 1.5, redline overview with M Munson and DEtlinger (.6)	1.60	495.00	792.00
7/22/2024	Megan Murray	B140	Review Class action response to AMB Motion and related communications	0.20	495.00	99.00
7/23/2024	Megan Murray	B140	Call S Wirth re Hearing re stay hearing (.8) Prepare for same with review of schedules, claims, analysis (1)	1.80	495.00	891.00
7/26/2024	Megan Murray	B140	Communications with Class Counsel and others re 'comfort order', review same provide thoughts (.6) and brief call (.4)	1.00	495.00	495.00
8/7/2024	Daniel Etlinger	B140	Analyze order granting trustee's motion to enforce automatic stay and denying AMB's motion for stay relief.	0.20	425.00	85.00
8/10/2024	Megan Murray	B140	Address stay relief issue in connection with Mullholland Complaint with S Wirth	0.50	495.00	247.50
8/12/2024	Megan Murray	B140	Email correspondence re cause of action, stay issues in connection with beneficiaries (.4)	0.40	495.00	198.00
8/14/2024	Megan Murray	B140	Reivew daily wire re AMB issues sent from S Wirth	0.20	495.00	99.00
2/19/2024	Megan Murray	B150	Prep for and Call for Center w/ creditors.	1.80	495.00	891.00
3/7/2024	Megan Murray	B150	Call with K Roberts on behalf of committee members (.7) and advancements and send letter (2) Discussions regarding same (.1)	2.80	495.00	1,386.00
3/8/2024	Megan Murray	B150	Draft Letter to Committee and related communications Prep for SNT Committee / Trustee - call with Matt Rowe, Call Kelly Roberts, review docket, address hearing matters, Comm. from potential trustees.	3.00	495.00	1,485.00
3/11/2024	Megan Murray	B150	Call with M Rowe re committee representaation (.8) draft engagement letter (.7) field calls from various constituents regarding Committee representation (1.4) review docket and address checklist of issues to address at first meeting (.8)	2.00	495.00	990.00
3/12/2024	Megan Murray	B150	Communication and strategy re 341 examination tomorrow (.3) begin draft of bylaws, resolutions (.5) Calls and emails regarding appointment and trustee status (1.7) review and revise resolutions for Committee (.2)	4.50	495.00	2,227.50
3/13/2024	Megan Murray	B150	Prepare and circulate ByLaws (2.8) extensive review of peladings and dockets (2)	6.70	495.00	3,316.50
3/13/2024	Megan Murray	B150	Attend 341 Exam, communications with creditors following same.	2.00	495.00	990.00

3/13/2024	Megan Murray	B150	Communicated with potential trustee candidate re case, advancement of creditor interests (.3) call with M Rowe re next steps, engagement and exam (.2)	0.50	495.00	247.50
3/14/2024	Megan Murray	B150	prepare Agenda for First Committee Meeting (1.5) Calls with Ms. Dorr re Trustee, issues in case (.3) Ms. Rowe (.2) + (.1) and related communications with creditors calling re inquiries (.4)	2.50	495.00	1,237.50
3/15/2024	Megan Murray	B150	Prepare for committee meeting (1 ) Call with Debtor's Counsel re Issues in case (.3) Call with Committee and follow up strategy re action items (.3)	1.60	495.00	792.00
3/15/2024	Scott Underwood	B150	Analysis of 341 process, next steps, chapter 11 trustee, and advancing interests of committee in light of all the foregoing (.8); attend zoom meeting with committee regarding the same (.5); analysis of next steps as counsel following the same (.3);	1.60	625.00	1,000.00
3/18/2024	Megan Murray	B150	Calls from creditors regarding questions about case, set up process for intake (.7) Set up committee meeting and communications with same (.3) _ (.2), analysis of trust accounting (.4)	1.60	495.00	792.00
3/18/2024	Megan Murray	B150	Communicate re EPIQ re committee page, setting up page, status, process.	0.50	495.00	247.50
3/19/2024	Megan Murray	B150	Address letter from beneficiary counsel to Center, trust statutes related to same from Committee Member	1.00	495.00	495.00
3/19/2024	Megan Murray	B150	Address Cardozo trust email from Committee Member (.2) Communications with other beneficiary counsel re status of case (.1) + (.2) + review and respond to email from Committee Member re Minutes (.1) analyze additional facts related to trust assets, state breakdown, investment holdings (.8) initial review of SNT Trust Docs to assess issues and prepare issue spotting. (.5)	1.90	495.00	940.50
3/19/2024	Megan Murray	B150	Call with Creditor attorney re questions about case. (.2) call w/ Matt Rowe re Center issues, (.7)	0.90	495.00	445.50
3/19/2024	Megan Murray	B150	Call with Epiq re setup of website questions (.2) address follow up email from Epiq re same (.1) and advance options for benefit of committee members (.6) communicate with B Mueller re interview (.2)	1.10	495.00	544.50
3/20/2024	Megan Murray	B150	Communications regarding press related to case (0.8) call with Patrick Mosley (HWH) re litigation claims (1).	1.80	495.00	891.00
3/20/2024	Megan Murray	B150	Communications with various creditors re inquiries including communications with press/media	0.80	495.00	396.00
3/20/2024	Megan Murray	B150	Call Committee member re Press	0.60	495.00	297.00
3/22/2024	Megan Murray	B150	Emails to coordinate conference with Trustee / Committee	0.10	495.00	49.50
3/25/2024	Megan Murray	B150	Extensive communications with committee member re Committee, Trust matters, other significant concerns in case about trust funds protection (1.5)	1.50	495.00	742.50
3/26/2024	Megan Murray	B150	Communicate with T Dorr re 341 meeting	0.20	495.00	99.00
3/26/2024	Megan Murray	B150	Respond to B Muller re Center, update for Creditors.	0.40	495.00	198.00
3/26/2024	Megan Murray	B150	Collect, organize, annotate and send legal pleadings to committee this week.	0.30	495.00	148.50
3/27/2024	Megan Murray	B150	Call Y Haidermota re CSNTA case, creditor.	0.10	495.00	49.50
3/27/2024	Megan Murray	B150	Extensive work on FAQs to Epiq for Committee (2.4) review and edit Notice to GUCS (.5) and related communications (.3) Call from Reporter (.7) and related follow up communications via emails and outline of topics for discussion (.8) email pleadings to Committee with comment on status of same and highlight issues for meeting (.3)	5.00	495.00	2,475.00
4/1/2024	Megan Murray	B150	Communications with Epiq re website matters (.5) and communication with various creditors (.7)	1.20	495.00	594.00
4/1/2024	Megan Murray	B150	Communicate with K McCoy re accounting meetings (.3)	0.10	495.00	49.50

4/1/2024	Megan Murray	B150	Communications with Creditors. (.2) + (.3) + (.5) and communications with WFLA News Media on various matters, proofs of claim, and upcoming spotlight (.4)	1.40	495.00	693.00
4/2/2024	Megan Murray	B150	Communications with Committee members in advance of accounting meetings (.4)	0.40	495.00	198.00
4/2/2024	Megan Murray	B150	Call with S Wirth re trust process (.4) follow up with various creditors re trust and proof of claim questions (.2 + .3 + .4); communications with EPIQ and UST re posting information and FAQs (.5) Call with WFLA and prep for same (1)	2.80	495.00	1,386.00
4/3/2024	Daniel Etlinger	B150	Conference with Megan Murray in preparation for creditor accounting interviews.	0.20	425.00	85.00
4/3/2024	Megan Murray	B150	Review issues with bond instruments (.1) and communicate with committee members re bond instruments (.2)	0.30	495.00	148.50
4/5/2024	Daniel Etlinger	B150	Analyze trust documents and attend interview with Committee Members (.8), (.8)(.7).	2.40	425.00	1,020.00
4/5/2024	Megan Murray	B150	Communications with committee member re Trustee accounting meeting and quick review of docs (.3) Comm. with S Wirth re AMB account (.2) and other interestd parties (.2) + (.4) + (.1) + (.3)	1.50	495.00	742.50
4/5/2024	Megan Murray	B150	Call Committee Member (.2) Communicate with J Markowitz (.1) commnications with S Wirth re Accounting meetings (.2) follow up communications and review of notes re following same (.3) communications regarding website updates and committee page (.2) field additional calls / emails from committee members (.3)	1.30	495.00	643.50
4/6/2024	Megan Murray	B150	Review and respond to committee questions, recovery of assets.	0.30	495.00	148.50
4/9/2024	Megan Murray	B150	Lengthy Commitee meeting (2) and review information re life insurance / vehicle on documents with Center to understand nature of Center's leins (.4) communicatons with creditors calls regardign claims, case status (.3)	2.70	495.00	1,336.50
4/10/2024	Megan Murray	B150	Prepare Agenda (.4) and prep for meeting; attend meeting with Committee members (1.9) review and respond to emails from Committee members post-meeting (.6) review class action complaint and coordinate with Trustee counsel re same. (1.4) email Epiq regarding state by state legal pro bono bankruptcy clinic or legal aid socieity for providing to unsecured creditors (.1) Emails to Accountant with additional information from committee members (.1)	3.50	495.00	1,732.50
4/11/2024	Megan Murray	B150	Call with committee member regarding Class Action (.3) communicatiosn with EPIQ regarding legal aid contacts and review of spreadsheet , strategy re communicatiosn with US Office and UCC counsel from Boy Scouts regarding same issues (.4) call from D Kirk re AMB pleadings and reservation of rights (.2)	0.90	495.00	445.50
4/12/2024	Megan Murray	B150	Review notice of 2004 exam and communications with creditors re same (.3)	0.30	495.00	148.50
4/15/2024	Megan Murray	B150	Calls to / from creditor beneficiaries in connection with proof of claim deadline (.8) draft letter to beneficiaries regarding claim purchases (.5) communications from credtors re trasnfer of docs to Meryll Lynch (.3) address legal aid clinics and advance reserach on same (.4) communicate with Court about website (.1) communicate with Press re Legal Aid (.2) attend hearing on status conference (.8)	2.60	495.00	1,287.00
4/16/2024	Megan Murray	B150	Calls from Creditors asking questions re status of case (.2) + (.3)	0.50	495.00	247.50
4/17/2024	Megan Murray	B150	Draft letter to beneficiaries	0.70	495.00	346.50

4/17/2024	Megan Murray	B150	call from Committee member (.1) prepare for and call with committee meeting (1.5) calls from creditors asking questions about case status, claims (.4) emails from Committee Member with information to provide to DOJ and brief review and forward of same (.4) coordinate response to Legal Aid agencies to assist creditors (.2) review documents regardign directed benefits from Committee Members (.5)	3.10	495.00	1,534.50
4/19/2024	Megan Murray	B150	Communicate with Epiq and Court re Letter to Beneficiaries.	0.20	495.00	99.00
4/19/2024	Megan Murray	B150	Revise Letter to Beneficiaries (.1) and circulate to Comittee for review (.1)	0.20	495.00	99.00
4/22/2024	Megan Murray	B150	Call from Credior re add'l Govt ID questions	0.20	495.00	99.00
4/22/2024	Megan Murray	B150	Call to Creditor re Govt IDs (.3) call from creditor regarding accounting of lost monies (.1)	0.40	495.00	198.00
4/25/2024	Megan Murray	B150	review Email re Trust balances and communicate with Committee re same	0.30	495.00	148.50
4/26/2024	Daniel Etlinger	B150	Call and email correspondences with beneficiary re case status.	0.20	425.00	85.00
4/26/2024	Megan Murray	B150	Call with Committee member re discovery, trust balances, and transfer of trusts	0.60	495.00	297.00
4/28/2024	Megan Murray	B150	Advance research re Govoni sent from Committee members (.3) and advancement of movement of funds for handful of beneficiaries (.1)	0.40	495.00	198.00
4/29/2024	Megan Murray	B150	Advance calls and list with M Sydow re Gov't IDs (.2 + .2) calls to various creditors regardign case questions (.5) email to K Mukamal re additional documentation (.1) refiew and respond to DOJ re update (.1)	1.10	495.00	544.50
4/29/2024	Melissa Sydow	B150	Telephone call to xxx re: info needed to facilitate transfer funds of xxx(.1) call to xxx re: info needed to facilitate transfer funds to xxx and left voicemails to other creditors (.1) telephone call with xxx re: info needed to facilitate transfer funds and follow up call with paralegal re: same (.2) telephone conference with xxx re: info needed to facilitate transfer funds (.1) telephone conference with xxx re: info needed to facilitate transfer funds of family trust (.1)	0.80	315.00	252.00
4/30/2024	Megan Murray	B150	compose call notes summarizing same (.2) Follow up call with Class Action counsel Communications with Committee re 2023 accounting (.4) call with S Wirth re various matters in case (.7) + (.2) extensive advancement of beneficiary / GOV ID Issues (.5) review notes from prior exam, prepare notes for 341 examination tomorrow (.6) communications with Epiq to address / update website wtih legal aid matters, additonal information and new docket entries (.3) Call with beneficiary with Claim question (.2) call ane email with attorneys re case questions (.3) review docket and updated appearances (.1) Call with DOJ (.6)	0.80	495.00	396.00
4/30/2024	Megan Murray	B150	tomorrow (.6) communications with Epiq to address / update website wtih legal aid matters, additonal information and new docket entries (.3) Call with beneficiary with Claim question (.2) call ane email with attorneys re case questions (.3) review docket and updated appearances (.1) Call with DOJ (.6)	4.00	495.00	1,980.00
4/30/2024	Melissa Sydow	B150	Call with xxx re: info needed to facilitate transfer funds (.4) send written correspondence re: same (.1) compose email to representative of trust forwarding contact information in order to obtain info needed to facilitate transfer of funds (.1) exchange emails with counsel for beneficiary re: transfer of funds (.2) call contacts for xxxx (.1) update notes re: forgoing and correspond with Steve Wirth re: same (.2)	1.10	315.00	346.50



			Attend 341 Exam (2) Attend to various and multiple calls from creditors, attorneys and constituents after the 341 exam (2.2) prepare agenda for and attend creditor committee meeting (1.7) finalize minutes afterwards (.4)			
5/1/2024	Megan Murray	B150	communications with DOJ and S Wirth re follow up items from Committee Meeting (.4) calls / emails with M Munson re new money from creditors (.5) additional strategy re dealing with Stay Motion, complaint, State Court hearing and agreed order, and coverage of same (.6)	7.50	495.00	3,712.50
5/1/2024	Melissa Sydow	B150	Attend 341 meeting (1.6) (dropped early) review email responses from beneficiaries re: government ID (.1)	1.70	315.00	535.50
5/2/2024	Megan Murray	B150	Communications with Epiq re Committee website / tab information	0.10	495.00	49.50
5/2/2024	Megan Murray	B150	Review correspondence re C Choe to B's trust, related strategy on behalf of committee re same (.3)	0.30	495.00	148.50
5/2/2024	Megan Murray	B150	Review Complaint in preparation for additional follow up with DOJ (.5) Emails with Committee and DOJ re interview times (.3) .	0.50	495.00	247.50
5/3/2024	Megan Murray	B150	Review news link article sent from committee member relating to CSNTA issues.	0.10	495.00	49.50
5/3/2024	Megan Murray	B150	Attention to B Mueller at 8 On Your Side communications.	0.20	495.00	99.00
5/3/2024	Megan Murray	B150	Call from Committee member re concerns related to trust situation.	0.30	495.00	148.50
5/3/2024	Megan Murray	B150	Address correspondence re creditors and trustee counsel and exit of trust relationship, call with S Wirth re same, and strategy re adjustment to trust process	1.40	495.00	693.00
5/3/2024	Megan Murray	B150	Respond to calls from creditors related to their trust plans Analyze correspondence from creditors regarding Trustee's position regarding new trust monies, change in trust administration, correspondence with S Wirth, counsel for trustee re same, and strategy re Committee motion to address new trust deposits (2) call with committee member re same (.5); conference with S. Wirth regarding the same (.6); related correspondence (.2).	0.40	495.00	198.00
5/3/2024	Scott Underwood	B150	Communications regarding script, creditor call log, and begin preparation of script for Epiq.	3.30	625.00	2,062.50
5/6/2024	Megan Murray	B150	Call with Arc of Space Coast (.1) Communications with Committee and S Wirth re trust deposits (.3)	0.60	495.00	297.00
5/6/2024	Megan Murray	B150	Call with Regina, Epiq contact re: status of updated language on website related to claims to assist claimants (.1) follow up written communication to xxxx re: info needed to facilitate transfer funds of xxxx Family Trust (.4) compose follow up email to representative of xxxx re forwarding contact information to obtain info needed to facilitate transfer of funds (.1) send written communication to xxxx (.1) telephone conference with xxxx re: grantor info needed for transfer and follow up written communication (.1) telephone conference with xxxx re grantor information and exchange emails re: same (.2) update notes re: forgoing and correspond with Steve Wirth re: same (.2)	0.40	495.00	198.00
5/6/2024	Melissa Sydow	B150	Calls from from two creditors with questions about claims. Address POC Video steps and Loom (.4) address questions and oversight of issues from individual creditors and tracking (.1)	0.50	495.00	247.50
5/7/2024	Megan Murray	B150	Coordination and communication with DOJ and Committee re meeting on 5/21 and 5/20.	0.50	495.00	247.50
5/7/2024	Megan Murray	B150	Call with Creditor regarding claim process (.3) review and revise script for claim overview with Epiq and advance same (.5) strategy regarding creditor deposit issues (.4) + (.2) communicate with Committee members re Govoni research (.2)	1.60	495.00	792.00

5/7/2024	Melissa Sydow	B150	Review email from beneficiaries re legal/medical records department.	0.10	315.00	31.50
5/8/2024	Megan Murray	B150	Communications with Committee re adjustments to stay relief discussion	0.10	495.00	49.50
5/8/2024	Melissa Sydow	B150	Review emails received from general counsel beneficiaries	0.10	315.00	31.50
5/9/2024	Melissa Sydow	B150	Review correspondence from Regina Amporfro re: language on the website (.1) review email from Pathways legal liason re: signed release (.1)	0.20	315.00	63.00
5/13/2024	Megan Murray	B150	Call with Jonathan Striefield re Class Action Stay Motion / Discussion (.8) communications with Creditors re same (.1) review and respond to email re crtical expenses (.1)	1.00	495.00	495.00
5/14/2024	Megan Murray	B150	Call with Committee re Stay issues and class actions (1) Attend hearing on stay relief (1.0) strategy calls regarding same (.5) review and comment on CPT Mgmt Agreement (.6)	1.00	495.00	495.00
5/14/2024	Megan Murray	B150	emails with S Wirth / Committee Counsel re stay issues and other MOR related issues (.4) eamils to creditor re claims, trust assets (.2)	2.70	495.00	1,336.50
5/15/2024	Megan Murray	B150	Prepare for (.3) and Call with Committee (1.5) call with S. Wirth re Class Action (.3) additional strategy re same (.4)	2.50	495.00	1,237.50
5/16/2024	Megan Murray	B150	Communication with M Munson re blog post (.1)	0.10	495.00	49.50
5/16/2024	Megan Murray	B150	Review article from R Bowman re Govoni past crimes (.2)	0.20	495.00	99.00
5/17/2024	Megan Murray	B150	Communications with DOJ regarding upcoming meetings (.1) and same wtih committee members (.1)	0.20	495.00	99.00
5/17/2024	Megan Murray	B150	Revisions to Stay Motion evaluating both M Rowe and M Munson's separate drafts (.8) Additional revisions to Managment Agreement and circualte same to S Wirth, DOJ (.5) Communications with Committee re revisions to same (.2) communications with S Wirth and creditors regarding various issues including FTAS Payments (.4) communications with Class Action Counsel re meeting (.1)	2.00	495.00	990.00
5/20/2024	Megan Murray	B150	Communicate with Creditors regarding DOJ meeting (.4) and advance prep calls re same (.3)	0.80	495.00	396.00
5/21/2024	Megan Murray	B150	Calls wtih DOJ / Creditor (1.0) creditor (1.5) email Creditor (.1) emails and calls with creditors re claims (.2) + .4)	3.20	495.00	1,584.00
5/21/2024	Melissa Sydow	B150	Attend meeting with the govt re claims (.7) summarize same to send notes to affected creditor (.3)	1.00	315.00	315.00
5/22/2024	Megan Murray	B150	Call with R Yant re creditor issuses in advance of hearing (.4) comunications with T Leeder re upcoming call (.1)	0.50	495.00	247.50
5/22/2024	Megan Murray	B150	Prepare for (.3) and attend Committee meeting (2.1)	2.40	495.00	1,188.00
5/23/2024	Megan Murray	B150	Review Trust of xxxx case regarding trust matters sent by Committee member (.4)	0.40	495.00	198.00
5/23/2024	Megan Murray	B150	Review and address thoughts from Committee members re standing, Trust fund spending, damages computations (.4) review extension to briefing schedules wtih Class Counsel(.1) address information and turnover request from FTAS with S Wirth and Committee (.2) comunication w/ Pro Bono counse re issues in case (.1) review correspondence re S.B. Trust (.1) Attend hearing (1) communications with D. Kirk re Wells Fargo funds (.2) communicate with E Hemmes re gofundme (.2)	1.30	495.00	643.50
5/29/2024	Melissa Sydow	B150	Compose detailed email to Committee re collecting additional information after calls with DOJ.	0.20	315.00	63.00
5/30/2024	Megan Murray	B150	review and respond to request from Beneficiary re Feb. Account Statement.	0.10	495.00	49.50
5/30/2024	Megan Murray	B150	Receive and review communications re Center employees, forward to Committee (.1)	0.10	495.00	49.50
6/6/2024	Megan Murray	B150	Review and respond to mail re committee member health issues. (.1)	0.10	495.00	49.50
6/6/2024	Megan Murray	B150	Communication with B Long re beneficiary request	0.10	495.00	49.50
6/7/2024	Megan Murray	B150	Address beneficiary request for recovery of funds (.2)	0.20	495.00	99.00
6/7/2024	Megan Murray	B150	Communications with Committee member and DOJ re request for information	0.40	495.00	198.00

6/7/2024	Megan Murray	B150	Communicate with Committee re AM Bank docs, advance storage and organization of same.	0.20	495.00	99.00
6/9/2024	Megan Murray	B150	Review and forward B Long invoice (.3) review CPT due diligence information and circulate (.3) review and respond to Beneficiary re 2 claims (.2) Review and respond to Committe Member re CPT (.1) email and call to cerditor regarding claims on Critical Expenses and forward to pro bono counse re same (.4)	1.30	495.00	643.50
6/9/2024	Megan Murray	B150	Call with committee member re litigaiton strategy.	0.70	495.00	346.50
6/10/2024	Megan Murray	B150	Call with M Goldberg, coordiate meetings with committee members, address coordiation of information with EPIQ, review proof of claim portion on website and address claim questions from beneficiaries, communicate with T Dorr (2.2)	2.20	495.00	1,089.00
6/11/2024	Megan Murray	B150	Address questions and communications, documents re CPT	1.50	495.00	742.50
6/11/2024	Megan Murray	B150	Revisions to POC Script, recorrecord same to provide to creditors (2) address zoom hearing issues (.3)	2.30	495.00	1,138.50
6/11/2024	Megan Murray	B150	Additional email with victims re POCs	0.20	495.00	99.00
6/12/2024	Megan Murray	B150	Prepare for (.5) and attend Committee Call (2.5) , review documents provided by , emails, CPT managment and asset atransfer agreement, Calls re same (2) Review and revise NDA (.6) Communicate with Epiq re video access, prep for Zoom Call (.7)	6.10	495.00	3,019.50
6/12/2024	Megan Murray	B150	Updated email to Comittee in preparation for meeting with collection of significant documents and records, bank account info, loan list, Trust balances, employees, information from Ashley Moody, other related Committee information for consideration	1.50	495.00	742.50
6/13/2024	Megan Murray	B150	Prepare outline for (.4)) and meeting with M. Goldberg re Committee Questions (2) Meeting with US re questions and concerns (1) separate calls with committee members re same (.5) follow up review and respond to various topics related to CPT Trust and questions, review of FL statutes and law and analysis of in pari delicto (.5) + (.6), coordination re meeting with B Long and AMB questions (.4).address strategy for hearing Friday (.5) Communicate with M Kish re beneficiary issues and prepetition trust requests (.3) and initial review of Kish trust docs (.2) address issues related to The Directed injunction and review documents related to same (.4) Communicate with Epiq re meeting with Creditors (.3)	7.00	495.00	3,465.00
6/15/2024	Megan Murray	B150	Review and respond to B Long re Boston Settlement Group	0.10	495.00	49.50
6/15/2024	Megan Murray	B150	Emails with B Long and Email / Calls re client's trust funds at Boston Settlement Group, advise communications with Attorney General. (.8) emails S Wirth and S Kapila re: agenda for Monday (.2) review of trust docs email M Kish re post petition requests and release of trust funds / recent order (.5) Calls and emails tounsecured beneficiaires (.6) Prepare NDA for Committee (.6) Prep agenda for M. Goldberg Meeting (.4) Emails with UST and Court re Order on stay motion and revise same to include hearing (.3) Email Committee re Soneet Zoom (.1) review claim register, email SWirth re POC status (.2) address Epiq hosted meeting (.2) coordinate with Epiq directly (.1) Communicate with Committee member re BSG issues (.1)	3.40	495.00	1,683.00
6/16/2024	Megan Murray	B150		0.70	495.00	346.50

6/17/2024	Megan Murray	B150	Call with Soneet and KMckoy regarding status of trust issues (1.2) prepare for and call with B Long re Bank 01 and other related trust issues (1.4) correspondence with beneficiary regarding vehicle payment (.2) and email correspondence with B Long and beneficiary re same (.2) call with S Wirth re class counsel issues and trust disbursement procedures (.4) advance AMB production matters (.2) Prepare notes for (.3) and call with CPT (1.0), calls with Beneficiaries (S F. (.2) + (.1) re trust payment issues, status of case (.2) , call with T Dorr re case (.1) call with M Munson re CPT call (.1) Communciation w/ Committee re research matters (.1) realated communications in advance of committee call tomorrow (.4) Prepare for (.8) and call with Committee (1.7) emails re bank accounts follow up (.4) and communicate with other commitee members, Trustee and Center re bank account / trust matters (.4)	3.60	495.00	1,782.00
6/18/2024	Megan Murray	B150	Communication with EPIQ re Zoom capacity	2.50	495.00	1,237.50
6/19/2024	Megan Murray	B150	Review and respond to email from S Wirth re order langauge (.2) add order langauge to address bank accounts (.1) cancel EPIQ zoom (.1) address beneficiary calls and response to B Long re critical claims (.4) Call with beneficiary (.6) additional call with other beneficiary counsel (.3)	3.30	495.00	1,633.50
6/21/2024	Megan Murray	B150	Communication with victim / trustee re taxes	0.10	495.00	49.50
6/24/2024	Megan Murray	B150	Calls with Victims (.4+.2). Ms. Leali (.1) advance information with Mr. Taibi re Alient Resident accounts (.4)	1.70	495.00	841.50
6/25/2024	Megan Murray	B150	Communicate with multiple Victim re issues with trust, questions.	0.20	495.00	99.00
6/25/2024	Megan Murray	B150	Communicate with Coommittee re former officers and related info	1.10	495.00	544.50
6/25/2024	Megan Murray	B150	Review and revise script (.8) and prepare and circulate agenda (.7) call with Committee (1.5) prepare minutes (.5)	1.20	495.00	594.00
6/25/2024	Megan Murray	B150	follow up with S Wirth re questions arising from call (.2) review information from Committee re TBales (.3) and discussions re same (.1)	0.40	495.00	198.00
6/26/2024	Megan Murray	B150	Reivew and responsd to Committee Member re Trust balances (.5)	4.10	495.00	2,029.50
6/29/2024	Megan Murray	B150	Call with Creditors re account, status of case, claims from Center (.3+.2).	0.30	495.00	148.50
7/1/2024	Megan Murray	B150	Communicate with Victim re car payments	0.50	495.00	247.50
7/2/2024	Megan Murray	B150	Prepare agenda for (.4) and attend Committee Call (1) email to S Wirth following meeting with questions for Govoni, et al. (.1)	0.20	495.00	99.00
7/3/2024	Megan Murray	B150	Call with Beneficiary, Center, and related emails to address car payments.	1.50	495.00	742.50
7/3/2024	Megan Murray	B150	Follow up call with Creditor to address car payment issues	0.50	495.00	247.50
7/5/2024	Megan Murray	B150	(.8) email B Long re same (.1) email creditor (.1) review script for Committee Zoom and outline of changes (.2) Revise minutes for Commitee and finalize (.5) set up calls with T Bales and Landvest Broker and related communications (.4) revisions to NDA based on Committee discussion (.5) address T Bales contracts to prepare questions (.4) review, revise and send qusetions to S Wirth for call on 7/6 (.3) address updated discovery dropbox (.1) revise script for Committee (1)	1.20	495.00	594.00
7/7/2024	Megan Murray	B150	Call with Victim to answer questions (.2) communicate with Committee re script updates (.2)	3.20	495.00	1,584.00
7/8/2024	Megan Murray	B150		0.40	495.00	198.00

7/10/2024	Megan Murray	B150	Review and address Trustee Supplements (.5 + 1) email re Committee Member (.1) Call Linda L re claimant issues (.4) and follow up email (.1) address emails regarding T Bales and review of yesterday's meeting, information from R Elliott (.6) emails addressing Creditor issues with car payment (.3) and related victim calls (.3) + (.6)	3.90	495.00	1,930.50
7/11/2024	Megan Murray	B150	Communicate with Committee re meeting, payment to former officers (.4)	0.40	495.00	198.00
7/11/2024	Megan Murray	B150	Call beneficiary counsel re status of cases, transfer (.2) strategy re response to Class Action supplement (.5) Strategy re Class Action (.1) revise and send SRBP Order and communicate with Trustee re same (.2) follow up with Committee on NDA and Script (.5) call/email beneficiary re Car Payment (.1)	0.70	495.00	346.50
7/15/2024	Megan Murray	B150	Return calls to Beneficiaries	0.10	495.00	49.50
7/16/2024	Megan Murray	B150	Calls to Beneficiaries re cars, status of case, etc.	0.80	495.00	396.00
7/16/2024	Megan Murray	B150	Address creditors' questions re POCs, status updates re case (.5)	1.40	495.00	693.00
7/17/2024	Megan Murray	B150	Communication with S Kapila to set meeting on 8/8, follow up with S Wirth (.1) prepare agenda for (1) and attend Committee Call (1.7) finalize minutes (.5) email to M Goldberg re agenda (.2) call and related emails with S Wirth re updates (.5) + (.2)	0.50	495.00	247.50
7/17/2024	Megan Murray	B150	Circulate NDA to Committee members	4.00	495.00	1,980.00
7/18/2024	Megan Murray	B150	Prepare for and call with M Goldberg and Committee	0.10	495.00	49.50
7/18/2024	Megan Murray	B150	Discussions with Trustee and creditor re victim trust and car payment	1.00	495.00	495.00
7/19/2024	Megan Murray	B150	Attend update call with M Goldberg (1) review and respond to KM and Committee re documents and NDA (.4)	0.40	495.00	198.00
7/19/2024	Megan Murray	B150	Review and address Beneficiary NOA	0.50	495.00	247.50
7/22/2024	Megan Murray	B150	Return calls to Beneficiaries	0.10	495.00	49.50
7/23/2024	Megan Murray	B150	Call with Victim re request for legal aid, critical expense issues, related email (.4)	1.40	495.00	693.00
7/24/2024	Megan Murray	B150	Communicate with Creditors/victims re C Odonnell re TBT News (.2) additional update re car payments, critical expenses (.4)	0.40	495.00	198.00
7/24/2024	Megan Murray	B150	Prepare agenda, circulate (.7) attend meeting with Committee (1.5) minutes post meeting (.4)	0.30	495.00	148.50
7/25/2024	Megan Murray	B150	Call Beneficiary re MSA (.3) call with S Wirth re CPT (.1)	2.60	495.00	1,287.00
7/26/2024	Megan Murray	B150	Communicate with victim re insurance for truck (.1) membership into Committee (.2)	0.40	495.00	198.00
7/29/2024	Megan Murray	B150	Call with Beneficiary re trust numbers.	0.30	495.00	148.50
7/30/2024	Megan Murray	B150	Call with victims re case questions (.4) + (.2) + (.1)	0.10	495.00	49.50
7/31/2024	Megan Murray	B150	Call with Creditor re statement, update in case.	0.70	495.00	346.50
8/2/2024	Megan Murray	B150	Communicate with Committee members re political donations	0.30	495.00	148.50
8/2/2024	Megan Murray	B150	Review and respond to email from Beneficiary (.2)	0.10	495.00	49.50
8/4/2024	Megan Murray	B150	Email trust links and Long Invoices to committee	0.20	495.00	99.00
8/5/2024	Megan Murray	B150	Calls to beneficiaries re questions, status of case.	0.20	495.00	99.00
8/5/2024	Megan Murray	B150	Call with Beneficiary re POC filing process and confirmation of filing.	0.40	495.00	198.00
8/6/2024	Megan Murray	B150	Call with Creditor re status of case, issues with opting out, etc. (.3) + (.4) (wayne Everatt) review notice by MG in Class Action, (.1) review Order on Stay Relief and related communications (.5) address opt out notice and CPT management agreement and motion / order, asset transfer agreement (3) email to creditor again addressing calls (.1) review response to discovery (.2) emails re Summary Judgment Order and related strategy (.4)	0.20	495.00	99.00
8/7/2024	Megan Murray	B150	Prepare agenda (.4) and attend zoom call with Committee members (1.5)	5.20	495.00	2,574.00
8/7/2024	Megan Murray	B150		1.90	495.00	940.50

8/8/2024	Megan Murray	B150	Follow up call with Committee after KM Call (.5)	0.70	495.00	346.50
8/8/2024	Scott Underwood	B150	communications with CRO's office re Creditor's medicine (.2)			
8/8/2024	Scott Underwood	B150	Analysis of complaint of committee member and potential impact upon membership on committee.	0.70	625.00	437.50
8/9/2024	Megan Murray	B150	Email Creditor re Legal Aid (.1) emails with CRO team re medicines (.2) respond to calls from other victims (.5)	0.80	495.00	396.00
8/12/2024	Megan Murray	B150	Call and email with Beneficiary re car payment	0.30	495.00	148.50
8/13/2024	Megan Murray	B150	Address issues with Death benefits for beneficiaries, review communication from Committee and Akerman re same, sort out issues with wrong name	1.50	495.00	742.50
8/14/2024	Megan Murray	B150	prepare agenda for 8/14 call (.8) circulate and address emails re same (.2) Attend Committee meeting (1.6)	2.40	495.00	1,188.00
8/14/2024	Melissa Sydow	B150	Attend Committee call today and prepare minutes for August 14th meeting (1.9)	1.90	315.00	598.50
8/16/2024	Megan Murray	B150	Call to beneficiary (.2) and related communication re legal aid services , spanish speaking beneficiairy (.2)	0.40	495.00	198.00
8/16/2024	Megan Murray	B150	Calls with Creditor re critical needs payment, claims, problems with health. (.3+.5 + .1) email to her re claim and process.	0.90	495.00	445.50
8/23/2024	Megan Murray	B150	Communicate with Committee re Directed article, sale of property	0.30	495.00	148.50
8/30/2024	Megan Murray	B150	Prepare agenda for call, minues from last call, attachments to circualte for discussion	0.80	495.00	396.00
8/30/2024	Megan Murray	B150	Call with Committee to update on status	1.50	495.00	742.50
8/30/2024	Melissa Sydow	B150	Attend weekly call with Committee to discuss AG communication and potential escrow account and follow up discussion with Megan Murray re: next steps.	2.90	315.00	913.50
9/4/2024	Megan Murray	B150	Call w/ court re letter (.4)Meeting with Committee and long strategy in advance to move cases and litigaiton forward (2.4 + 1.8) extensive work on tracking spreadsheet and issues to advance with Trustee (2) follow up on officer matters with Committee Member and email S Wirth re same (.3)	6.90	495.00	3,415.50
9/9/2024	Megan Murray	B150	Address request for interview news and with Committee member	0.40	495.00	198.00
9/9/2024	Megan Murray	B150	Communicate with Victims (.4) pre and post hearing.	0.40	495.00	198.00
9/11/2024	Megan Murray	B150	Prepare for and attend Committee call (2.4)	0.70	495.00	346.50
9/11/2024	Melissa Sydow	B150	Prepare for and attend weekly meeting with Committee.	2.20	315.00	693.00
9/12/2024	Melissa Sydow	B150	Receive and review correspondence with client re: proposed questions for Friday informal meeting with Center employees.	0.20	315.00	63.00
9/14/2024	Megan Murray	B150	Call with Committee Members re call with Center	0.50	495.00	247.50
9/15/2024	Melissa Sydow	B150	Attend call with committee re: call with Center employees.	0.50	315.00	157.50
9/16/2024	Megan Murray	B150	Talk to creditor re clam procedures (.3)	0.30	495.00	148.50
9/23/2024	Megan Murray	B150	Address letter to Mr. Holmes and notice with Court (.3) + .2)	0.50	495.00	247.50
9/25/2024	Megan Murray	B150	Meeting with MJS to address issue tracking and modification of spreadsheet after calls with S Wirth and Committee (.2) +(2) Meet wtih SWirth re same (1) meeting with Committee on various issues (1.5) follow up call with S Wirth re servers and discovery (.3) email with committee members re Brittany Govoni (.2)	4.90	495.00	2,425.50
9/25/2024	Melissa Sydow	B150	Zoom Meeting with Committee	1.50	315.00	472.50
9/27/2024	Megan Murray	B150	Email / call with victim re \$215 Storage	0.20	495.00	99.00
9/30/2024	Megan Murray	B150	Communicate with T Dorr re Victim call (.1) review and provide comments on escrow agreement (.5) communicate re Class Action AMB discussion (.1)	0.70	495.00	346.50
3/14/2024	Daniel Etlinger	B160	Revise UM employment package from negative notice to expedited consideration.	1.00	425.00	425.00
3/14/2024	Megan Murray	B160	Revisions to Application, Declaration and Order (1.8) + (.4)	2.20	495.00	1,089.00

3/18/2024	Megan Murray	B160	Address EPIQ as claims agent, analysis and inquiry regarding EIPQ application.	0.20	495.00	99.00
3/18/2024	Megan Murray	B160	Email to Committee re Application	0.10	495.00	49.50
3/20/2024	Megan Murray	B160	Address additional concerns and issue with Declaration of Hill Ward Henderson	0.30	495.00	148.50
3/20/2024	Megan Murray	B160	Draft Objection to Hill Ward Henderson application regarding disclosure concerns of Committee	2.00	495.00	990.00
3/28/2024	Megan Murray	B160	Call with P. Mosley re case, involvement, and pending application (.8)	0.80	495.00	396.00
3/28/2024	Scott Underwood	B160	Conference with P. Mosley regarding case background per his knowledge, history of firm involvement, and pending application to employ/likely objection to the same (.9); outline next steps and advance the same (.3);	1.20	625.00	750.00
4/16/2024	Megan Murray	B160	Review and address Akerman E Discovery application (.5) and run by Committee (.1)	0.60	495.00	297.00
5/10/2024	Scott Underwood	B160	Analysis of class and stay issues (.3);	0.30	625.00	187.50
5/29/2024	Megan Murray	B160	Review and consider SRPB application for fees (.5)	0.50	495.00	247.50
6/19/2024	Megan Murray	B160	Draft/outline putative potential objection to SRBP fees with Trustee after hours, send same with comment (.5)	0.50	495.00	247.50
6/20/2024	Megan Murray	B160	Call with SRBP re App and extension of DL, interim order only (.2) review S Wirth's amendments (.1)	0.30	495.00	148.50
7/2/2024	Megan Murray	B160	review SRBP Fee app, advance discussions	0.20	495.00	99.00
7/2/2024	Scott Underwood	B160	Review and analyze, including related correspondence, of SRBP fee application order and protections for estate.	0.30	625.00	187.50
7/3/2024	Megan Murray	B160	Revise order on SRBP App, email S Wirth re same (.2)	0.20	495.00	99.00
7/17/2024	Megan Murray	B160	Email to S Stichter re App Order and related communication with S Wirth re same	0.10	495.00	49.50
9/6/2024	Megan Murray	B160	Review and consider implications of Akerman Fee App	0.30	495.00	148.50
9/7/2024	Megan Murray	B160	Advance Application for Fees	0.80	495.00	396.00
9/11/2024	Megan Murray	B160	Review Trustee application and address potential holdback (.5)	0.50	495.00	247.50
9/13/2024	Megan Murray	B160	Email S Wirth re holdback	0.10	495.00	49.50
9/23/2024	Megan Murray	B160	Review KM Application (.5) and communicate with S Wirth re same (.1)	0.60	495.00	297.00
9/26/2024	Megan Murray	B160	Email to S Wirth re Applications and holdback, with review of MORs and distributions, address concerns over amount of funds left in estate	0.40	495.00	198.00
9/27/2024	Megan Murray	B160	Communicate with S Wirth re Akerman App.	0.20	495.00	99.00
3/18/2024	Megan Murray	B190	Address potential 2004 exam of Debtor	0.20	495.00	99.00
3/19/2024	Daniel Etlinger	B190	Analyze class action lawsuit's complaint in preparation of drafting 2004 requests.	1.00	425.00	425.00
3/19/2024	Megan Murray	B190	Email to P Mosely re CSNTA issues	0.10	495.00	49.50
3/19/2024	Megan Murray	B190	Address changes, concerns re CSNTA 2004 exam	0.30	495.00	148.50
3/19/2024	Megan Murray	B190	Reivew new motion to appoint interim class counsel, assess email from S Wirth re new class complaint, issues with Orris complaint, and review allegations in same	0.50	495.00	247.50
3/20/2024	Megan Murray	B190	Strategy re 2004 examination requests, (.4) and review of Various Trust iterations from creditors (.2)	0.60	495.00	297.00
3/22/2024	Jamie Patterson	B190	Started outlining the executive summary of the second amended complaint	1.00	150.00	150.00
3/22/2024	Jamie Patterson	B190	Read and highlighted key points in the Second Amended Complaint of Arena versus the multiple Defendants to assist counsel in deeper analysis	2.60	150.00	390.00
3/22/2024	Jamie Patterson	B190	Initial phone call with attorney to get background on case and subject of the project	0.20	150.00	30.00
3/23/2024	Jamie Patterson	B190	Continued writing up executive summary of second amended complaint	2.00	150.00	300.00
3/24/2024	Jamie Patterson	B190	Finalized executive summary of second amended complaint and sent it to attorneys to review	1.80	150.00	270.00

3/25/2024	Megan Murray	B190	Communications with other creditors in response to Center matters, representation, status of case and recovery (.2) + (.3) + (.5) + (.2) communicate with WFLA Reporter (.1)	1.30	495.00	643.50
3/25/2024	Megan Murray	B190	Review Pleadings from BFG / Govoni in Class Action and consider Committee response, status of stay relief, effect on BK (.8)	0.80	495.00	396.00
3/25/2024	Megan Murray	B190	Review outline of causes of action (.5) begin prep of FAQ for Epiq website (.5) review and revise / respond to extensive trust email from Committe Member (.8)	1.80	495.00	891.00
3/25/2024	Scott Underwood	B190	Analysis of motion to stay and Defendants' positions in class action suit filing.	0.40	625.00	250.00
3/26/2024	Megan Murray	B190	Advance detailed FAQs for EPIQ website, case facts and background of case and trust issues.	2.50	495.00	1,237.50
3/31/2024	Megan Murray	B190	Communications with Committee member and S Wirth re annual financial statement language and potential for issues, Website language and changes for same (.6)	0.60	495.00	297.00
4/1/2024	Megan Murray	B190	Strategy with D Etlinger re contingency fee issue, Class Action matters.	0.40	495.00	198.00
4/8/2024	Daniel Etlinger	B190	Call and email correspondence with Tom Leeder re class action lawsuit.	0.20	425.00	85.00
4/12/2024	Scott Underwood	B190	Conference with Bank counsel regarding class case and pending motions there (.1);	0.10	625.00	62.50
4/15/2024	Scott Underwood	B190	Analysis of events of hearing and next steps for committee (.5);	0.50	625.00	312.50
4/16/2024	Megan Murray	B190	Call Steve Wirth (.5) address class action issues and analysis of claims, email to S Wirth re same (.5) Review status report (.1) and related communications (.2)	1.30	495.00	643.50
4/17/2024	Megan Murray	B190	Address Class Action Complaint allegations (1.4) and send to DEtlinger to review, assist	1.40	495.00	693.00
4/21/2024	Megan Murray	B190	Rview of class action Motion re class Counsel and discussion with S Wirth re same (.9) communications regarding emails related to Staunton, Govoni, related entities and advancement of related analysis from committee member (2)	2.90	495.00	1,435.50
4/25/2024	Megan Murray	B190	Email to Committee re Subpoenas (.1) email complaint and review of same (.4)	0.50	495.00	247.50
4/25/2024	Megan Murray	B190	Strategy call re Class Action	0.80	495.00	396.00
4/26/2024	Megan Murray	B190	Attend call on Class Actions (1) and communication with S Wirth re SNT grantors (.1)	1.10	495.00	544.50
5/3/2024	Daniel Etlinger	B190	Prepare for and attend hearing on urgent petition to appoint a successor trustee in beneficiary's case, related to stay relief in CSNTA.	1.00	425.00	425.00
5/3/2024	Megan Murray	B190	Review subpeona to Key Bank	0.10	495.00	49.50
5/6/2024	Megan Murray	B190	Review and revise Requeset for Copies	0.10	495.00	49.50
5/6/2024	Megan Murray	B190	Communication with S Wirth and Committee members re emergency motion issues, depository issues regarding new and old deposits (.5) review state court order addressing same and consideration of implications for emergency motion (.3) begin draft of E Motion for Relief from Stay (.5)	1.30	495.00	643.50
5/8/2024	Megan Murray	B190	Review notice, email re subpoenas to Committee (.1)	0.10	495.00	49.50
5/14/2024	Megan Murray	B190	Communications with DOJ re upcoming meetings and find and send Committee Member information (.6)	0.60	495.00	297.00
5/20/2024	Megan Murray	B190	Calls to creditors regarding seeking payments out of trust (.3 + .4) revisons to Motion (.5) and follow up call with M Rowe re Motion (.3) prep demand letter to B Long re payment timing (.8 prep for call with B Long and S Wirth tomorrow, draft outline (.1)	2.40	495.00	1,188.00
5/21/2024	Megan Murray	B190	Email and call with Matt Kish re Center issues, timing and status of recovery	0.40	495.00	198.00



5/21/2024	Scott Underwood	B190	Conference calls with 11 Trustee and counsel regarding litigation strategy and payment to Govani related accountant (1.3); and with the same and counsel in class action (1.4); follow up action items regarding the same (.3); related correspondence (.2).	3.20	625.00	2,000.00
5/23/2024	Scott Underwood	B190	Attend conference with Trustee and class action counsel regarding stay motion and possible resolutions (1.0);	1.00	625.00	625.00
5/28/2024	Megan Murray	B190	Call S Wirth re timing, etc. of class action.	0.40	495.00	198.00
6/1/2024	Scott Underwood	B190	Analysis, revisions to, and correspondence regarding proposed order to resolve stay issues and let class action proceed in more controlled/agreed manner.	0.40	625.00	250.00
6/3/2024	Scott Underwood	B190	Analysis and correspondence regarding possible resolution of class stay motion issues.	0.30	625.00	187.50
6/4/2024	Scott Underwood	B190	Conference with S. Wirth regarding class action dynamics (.2); conference with class action counsel regarding the same (1.0); edit draft order on stay relief for the same (.3); review state of Florida injunction against Govoni and BFG and related filings (.3); related correspondence (.5).	2.30	625.00	1,437.50
6/12/2024	Scott Underwood	B190	Attend zoom conference call with committee regarding class/stay relief issues and current trust accounting status (1.6);	1.60	625.00	1,000.00
6/20/2024	Scott Underwood	B190	Review and edit draft stay enforcement motion order for briefing (.3); related correspondence (.2).	0.50	625.00	312.50
6/26/2024	Scott Underwood	B190	Review and analysis of draft confidentiality agreement and edit the same (.7); conferences with S. Wirth and M. Murray regarding the same and overall stay issues (.9); related correspondence (.2).	1.80	625.00	1,125.00
6/30/2024	Scott Underwood	B190	Analysis and correspondence regarding possible resolution with class counsel.	0.30	625.00	187.50
7/5/2024	Megan Murray	B190	Review and consider 2004 request by creditor and related communications	0.30	495.00	148.50
7/5/2024	Scott Underwood	B190	Analysis of possible discovery re estate and committee member.	0.20	625.00	125.00
7/9/2024	Scott Underwood	B190	Correspondence regarding stay motion briefing timelines.	0.30	625.00	187.50
7/10/2024	Megan Murray	B190	Draft M to extend Briefing Schedule	0.60	495.00	297.00
7/11/2024	Megan Murray	B190	Communicate w Committee Member re Goldberg meeting. (.1) review and revise NDA and send to S Wirth (.3) revise Supplement and send to SAU for comment (.1)	0.50	495.00	247.50
7/12/2024	Scott Underwood	B190	Analysis of additional research, and advance further research for draft brief on stay motion (.7); review and revise draft brief further (1.9).	2.60	625.00	1,625.00
7/15/2024	Scott Underwood	B190	Conferences with counsel, including for trustee, regarding possible stay issue resolutions and status of discussions.	0.50	625.00	312.50
7/16/2024	Megan Murray	B190	Strategy re Class Action timing, strategy, response.	0.40	495.00	198.00
7/16/2024	Scott Underwood	B190	Lengthy conference regarding possible stay issues resolution with D. Jennis and M. Murray (.9); follow up to advance next steps and advise trustee (.2).	1.10	625.00	687.50
7/17/2024	Scott Underwood	B190	Review and analysis of and correspondence regarding AMB's stay relief motion and arguments in response to the same.	0.50	625.00	312.50
7/19/2024	Scott Underwood	B190	Review and analyze response of Trustee to AMB motion (.3); analysis of and comment upon Committee's draft and outline of argument on the same topic (.5).	0.80	625.00	500.00
7/22/2024	Scott Underwood	B190	Prepare for stay hearing, including claims analysis, and analysis of new solicitation and advertising efforts of class counsel.	1.80	625.00	1,125.00
7/23/2024	Scott Underwood	B190	Prepare for, including argument outline (2.5) and attend hearing on the same (2.2).	4.70	625.00	2,937.50
7/24/2024	Scott Underwood	B190	Conference with Trustee's counsel regarding next steps in note litigation and following stay hearing (.3); advance the same for committee (3).	0.60	625.00	375.00

7/25/2024	Scott Underwood	B190	Review and comment on draft summary judgment order and related correspondence.	0.50	625.00	312.50
7/26/2024	Megan Murray	B190	Communicate with S Wirth re proposed order on MSJ, revisions to same (.4)	0.40	495.00	198.00
7/26/2024	Scott Underwood	B190	Review defendant edits and further edit SJ proposed order following other side comments (.3); review draft comfort motion to appoint interim counsel from class counsel (.2); conference with trustee's counsel regarding the foregoing (.3); related correspondence (.2).	1.00	625.00	625.00
7/29/2024	Megan Murray	B190	Review correspondence re questions re reserach on Class Action matter (.1) review case law circualted by S Wirth and comment on same (.4) email re Trust updates (.1)	0.60	495.00	297.00
7/29/2024	Scott Underwood	B190	Analysis of Trustee's property of the estate cases in response to class arguments.	0.40	625.00	250.00
8/2/2024	Megan Murray	B190	Review extensive article and reserach additional information in Directed Case (.6) email S Wirth re same (.1)	0.70	495.00	346.50
8/5/2024	Megan Murray	B190	Address additional changes on MSJ wtih Trenam comments	0.10	495.00	49.50
8/5/2024	Scott Underwood	B190	Review, analysis, and assess next steps following stay enforcement motion order.	0.50	625.00	312.50
8/6/2024	Megan Murray	B190	Call re MSJ Order, (.3) review and revise same with comments (.8)	1.10	495.00	544.50
8/6/2024	Scott Underwood	B190	Communicate, correspondence, and analysis of SJ order edits from Defendnats.	0.40	625.00	250.00
8/7/2024	Megan Murray	B190	Review MSJ Order and related communications	0.10	495.00	49.50
8/9/2024	Megan Murray	B190	Review continued settlement communications between S Wirth and L Fernandez	0.10	495.00	49.50
8/9/2024	Megan Murray	B190	Followup with MJS re case issues, advancement of trustee issues and overview of litigaiton	1.00	495.00	495.00
8/9/2024	Melissa Sydow	B190	Discuss with Megan Murray recent meeting with Trustee and litigation approach for Committee moving forward.	1.00	315.00	315.00
8/9/2024	Scott Underwood	B190	Further analysis and input regarding committee member suit and continued settlement discussions on other disputes.	0.30	625.00	187.50
8/10/2024	Scott Underwood	B190	Analysis of and correspondence regarding possible stay issues of insurance claim against law firm from committee member.	0.30	625.00	187.50
8/11/2024	Scott Underwood	B190	Correspondence with Trustee counsel regarding possible stay violation.	0.10	625.00	62.50
8/12/2024	Scott Underwood	B190	Continued analysis and correspondence regarding trustee's concerns about insurance related stay violation.	0.40	625.00	250.00
8/13/2024	Megan Murray	B190	Communication with COMmittee members re missing funds, article related to Directed case.	0.30	495.00	148.50
9/3/2024	Megan Murray	B190	Review PFS and other docs from Trenam (.7) review subpoenas etc. (.4) communicate with S Wirth and M Goldberg re MSA issues and Gap period for one of the beneficiaries (.4) advance excel spreadsheet overview of issues (1.2+.7)	3.20	495.00	1,584.00
9/3/2024	Megan Murray	B190	Return calls to Victims (2.5)	2.50	495.00	1,237.50
9/4/2024	Scott Underwood	B190	Analysis and preparation for committee meeting in light of growing settlements likely usurping potential assets from this estate and next steps/approach (.4); attend portion of committee meeting regarding this topic (not full meeting) (.9); related correspondence (.4).	1.70	625.00	1,062.50
9/6/2024	Megan Murray	B190	Initial review of Akerman app to advance discovery, Strategy re supboenas, C. Schroeder, moving forward with 2004 exam and suboena tracking, etc. (1.2) review and revise opt out procedures (.5) Streategy re advancement of all these matters with MJS (.5)	2.20	495.00	1,089.00
9/7/2024	Megan Murray	B190	Review Suboenas filed yesterday (.1)	0.10	495.00	49.50
9/8/2024	Megan Murray	B190	Review documents related to fmr officers and email Committee and S Wirth to advance investigation (.5)	0.50	495.00	247.50

9/10/2024	Megan Murray	B190	Address discovery with AMB and others in Relativity	0.40	495.00	198.00
9/10/2024	Melissa Sydow	B190	Receive message from AG attorney (.1) review meeting minutes and org chart from Trustee's counsel (.3) compose email to Committee re: FBI investigation (.1) review recently served subpoenas and update tracking chart (.1) exchange emails with Raye with Trustee's office re: subpoena tracking system (.2)	0.70	315.00	220.50
9/11/2024	Megan Murray	B190	Advanced emails re collection efforts with Akerman, AMG, other targets (.5) reiew E Discovery Platform and call to Akerman for assistance (.2)	2.40	495.00	1,188.00
9/13/2024	Megan Murray	B190	Review summary judgment motion	0.10	495.00	49.50
9/13/2024	Megan Murray	B190	Assist with property record searches to advise J Patterson re real estate searches and liens	0.30	495.00	148.50
9/16/2024	Melissa Sydow	B190	Edit and finalize 2004 exam of Boston Financial Group and to Leo Govoni.	1.60	315.00	504.00
9/23/2024	Megan Murray	B190	Email to E Koenig re service of subpoena, discussion with Trenam (.2)	0.20	495.00	99.00
9/24/2024	Megan Murray	B190	Review and respond to email from S Wirth re discovery (.1) Email to J Shifino re document requeuest (.1) revie MOR, address questions with Steve re other operating items (.4) call with R Yant re Teresa Foundation (.3) address supoena tracking spreadsheet (3.2) emails with S Wirth re T foundation and Class Action (.4)	4.60	495.00	2,277.00
9/25/2024	Jamie Patterson	B190	Created drafts of 2004 exams for Fmr. Employees	0.70	150.00	105.00
9/25/2024	Melissa Sydow	B190	Call with counsel for trustee re: status of subpoenas (1.) exchange emails with escrow agent office re: necessary documents (.1)	1.10	315.00	346.50
9/26/2024	Megan Murray	B190	Call E Koenig re Subpoena, Leo's position on Note, etc.	1.00	495.00	495.00
1/19/2024	Megan Murray	B210	Review and analyze dockets to address SNT Case in advance of meeting with creditors (1.5) and call to discuss same (1)	2.50	495.00	1,237.50
3/13/2024	Scott Underwood	B210	Analysis of case history and docket to assess and strategize regarding next steps operationally and with possible trustee and goals for the same (1.6); conferences regarding the same with M. Murray, and possible trustee candidate (.5); Analysis of case, next steps, and trustee status (.9);	2.10	625.00	1,312.50
3/19/2024	Scott Underwood	B210	conference with possible candidate regarding status (.4); conference with counsel for bank regarding class action and overall status (.5); related correspondence (.6).	2.40	625.00	1,500.00
3/20/2024	Scott Underwood	B210	Lengthy conference with bank counsel regarding their knowledge and history of Debtor operations and scheme (.9); prepare for committee call (.2);	1.10	625.00	687.50
3/21/2024	Scott Underwood	B210	Attend conference call with Debtor's counsel regarding filing and operations history (.4); follow up action items from the same (.3); conference with S. Wirth regarding chapter 11 trustee appointment and key next steps (.2); related correspondence (.3).	1.20	625.00	750.00
3/29/2024	Scott Underwood	B210	Conference with D. Goldfarb regarding historical special needs structures, founding in congress, and possible expert witnesses for the same in future litigation, as well as alternative trustee's to possible transfer trustee role to (.6);	0.60	625.00	375.00
4/14/2024	Megan Murray	B210	Review and approve Motion re Bonds and communication with S Wirth re same (.2)	0.20	495.00	99.00
4/25/2024	Megan Murray	B210	review and respond to email from S Wirth re business transfer of trusts using grantor IDs	0.10	495.00	49.50
5/19/2024	Megan Murray	B210	Finalize and circulate with comment motion regarding taking new funds / trust elsewhere.	0.30	495.00	148.50
5/29/2024	Megan Murray	B210	Email re Wells Fargo and Lien rights.	0.10	495.00	49.50
5/30/2024	Daniel Etlinger	B210	Analyze and comment on proposed asset transfer agreement.	0.70	425.00	297.50

5/30/2024	Megan Murray	B210	Review CPT Transfer agreement edits / D Etlinger	0.20	495.00	99.00
5/30/2024	Megan Murray	B210	Communications w/ S Wirth re CPT, obtaining copies of trust accounting	0.20	495.00	99.00
6/10/2024	Megan Murray	B210	Address CPT due diligence matters	0.20	495.00	99.00
6/11/2024	Megan Murray	B210	Address AMB Production matters on call with B Long (.5), follow up strategy re same (.2), questions and discussion re trust balances (.6)	1.30	495.00	643.50
6/14/2024	Daniel Etlinger	B210	Analyze MTA and ATA, and email correspondences with Megan Murray re same.	2.00	425.00	850.00
6/14/2024	Megan Murray	B210	Prepare for hearing with review of Class response and assesment (1) and attend hearing on CSNTA issues, Stay Relief and related communications with Trustee and counsel re same (3.5) call with Trustee re UST meeting (.4) prep agenda for KM Meeting and circualte to S Wirth (.1) review and analyze request from beneficiary and begin response re same w/ documents (.3) call to assess gofundme options (.7) and prepare notes re same (.2) review and respond to emails re Boston Settlement Group (.3) and review Sunbiz for other Govoni entities to address on Monday (.4)	6.70	495.00	3,316.50
6/14/2024	Megan Murray	B210	Reivew and respond to CPT questions	0.20	495.00	99.00
6/18/2024	Daniel Etlinger	B210	Attend conference call with CPT re transition logistics. Analyze information from Emma Hemmnes re Trust	1.00	425.00	425.00
6/19/2024	Megan Murray	B210	Adminstrators and communications with M Goldberg re same	0.30	495.00	148.50
6/21/2024	Megan Murray	B210	Assess motion on increasing critical expenses	0.20	495.00	99.00
6/21/2024	Megan Murray	B210	Review and edit / provide comments to CPT Mgmt Agreeemnt and strategy re next steps in process, address critical concerns about standalone trusts	1.50	495.00	742.50
6/27/2024	Megan Murray	B210	Review Conractor agreement for T Bales, request additional information (.3) advance additional analysis re concerns about T Bales' connections with Govoni (.2)	0.50	495.00	247.50
7/1/2024	Megan Murray	B210	Communicate with S Wirth re Insurance	0.20	495.00	99.00
7/1/2024	Megan Murray	B210	Communications with Emma Hemnes re escrow (.1) review B Long invoice and send to Committee with comment, (.3) and email B Long re same (.1) address T Bales invoices and communicate with Committee re same in advance of approval of services with review of contract (.7) review Pinellas and Hllls Clerk of Court records and address sale of Govoni property, email to Trustee re same (.6) communications with S Wirth re continuation of trust procedures (.3)	2.10	495.00	1,039.50
7/2/2024	Megan Murray	B210	Review MOR, address issues with same (.5) review FTAS recrods, email to S Wirth re same (.2) prepare quetions for Glenn G for tomorrow. (.2)	0.90	495.00	445.50
7/8/2024	Megan Murray	B210	Call re Landvest (.6) and related follow up communications (.4) advance call with T Bales (.2) addrss questions re Maine Property from Committee (.4)	1.60	495.00	792.00
7/11/2024	Megan Murray	B210	Reivew and response to CRO office re beneficiary properties	0.20	495.00	99.00
7/15/2024	Megan Murray	B210	Address CPT redlines ( .4 )	0.40	495.00	198.00
7/15/2024	Megan Murray	B210	Communicate with S Wirth and AKerman re CPT, review redlines, consideration of changes, scope of issues to address. (2) emails internally to address same (.2)	2.00	495.00	990.00
7/16/2024	Megan Murray	B210	Additional redlines revisions to CPT redlines	2.40	495.00	1,188.00
7/17/2024	Megan Murray	B210	Revisions and comments to CPT redline (2.3) and related communications with Akerman and CPT (.2)	2.50	495.00	1,237.50
7/18/2024	Megan Murray	B210	Communicaions re CPT contract, updates and meeting Monday	0.20	495.00	99.00
7/22/2024	Daniel Etlinger	B210	Analyze latest ATA and MTA redlines, and, conference call with Mark Munson and Megan Murray re same.	1.00	425.00	425.00

7/22/2024	Megan Murray	B210	Long call with CPT to address management agreement and other changes and review revised CPT docs (2) follow up revisions to revised set of documents circulated by CPT following call (.7)	2.70	495.00	1,336.50
7/22/2024	Megan Murray	B210	Communications with MGoldberg re alternate trustees. Review MOR and advance issues with CPT costs, windown costs and related questions from C9mmitee (.4)	0.20	495.00	99.00
7/24/2024	Megan Murray	B210	communicate with CRO re trust statements (.1) Analyze latest management services agreement, and, asset transfer agreement and provide comments to Megan Murray.	0.40	495.00	198.00
7/25/2024	Daniel Etlinger	B210	Address CPT questions	1.00	425.00	425.00
7/25/2024	Megan Murray	B210	Extensive CPT revision to Motion related communications with S Wirth re same (2.4) review SWirth revisions (.4)	0.40	495.00	198.00
7/30/2024	Megan Murray	B210	Address CPT communications with S Wirth, MGoldberg and concepts, exchange emails on Mgmt Agreement, Asset Transfer Agreement (and review and revise same).	2.80	495.00	1,386.00
7/31/2024	Megan Murray	B210	Revisions to CPT Motion, calls to S Wirth re same, circulate to DEtlinger with comment.	4.20	495.00	2,079.00
8/1/2024	Megan Murray	B210	Review and revise mangment agreements and send to S Wirth with comments (2.4) review notice of filing (.1)	2.50	495.00	1,237.50
8/7/2024	Megan Murray	B210	Help advance download dropbox docs / AMB docs	2.50	495.00	1,237.50
8/7/2024	Megan Murray	B210	Prepare for and prepare MJS for call with KM (1) and attend call with S Kapila (.5)	0.10	495.00	49.50
8/8/2024	Megan Murray	B210	Discuss status of case with Megan Murray (1.) review agenda for call and initial review docket materials to prepare for same (1.2) attend call with Trustee (1.)	1.50	495.00	742.50
8/8/2024	Melissa Sydow	B210	Review and edit Opt out Provisions (.3) review last drafts and communicate with Steve and Will CPT re provisions (.8) email re same (.1) review and communicate re Trust Distribution Procedures changes (.4)	3.20	315.00	1,008.00
8/11/2024	Megan Murray	B210	Review and respond to email from Will @ CPT re billing rates, review past documents and website for billing structure of CSNTA	1.60	495.00	792.00
8/12/2024	Megan Murray	B210	Communications re Bluerock, titling of trusts in name of officers personally, additional investigation needed with Committee (.4) and Akerman (.1)	0.50	495.00	247.50
8/12/2024	Megan Murray	B210	Address fee structure changes, propose new sliding scale, request additional thought and consideration of the issue for beneficiaries, review trust spreadsheet and sort, analyze to address same	0.50	495.00	247.50
8/13/2024	Megan Murray	B210	Calls with S Wirth re case matters	0.60	495.00	297.00
8/14/2024	Megan Murray	B210	Research CPT background and additional analysis in preparation for evaluation of new agreement with CPT (1.3)	0.30	495.00	148.50
8/14/2024	Melissa Sydow	B210	Emails re Trustee fees and calculations	1.30	315.00	409.50
8/16/2024	Megan Murray	B210	Receive and review email from Michelle Garcia re: her interest in serving as escrow agent (.1)	0.10	495.00	49.50
8/21/2024	Melissa Sydow	B210		0.10	315.00	31.50
8/22/2024	Megan Murray	B210	Review and address issues in connection with CPT revisions Communications re revised CPT motion and opt out notice; Akerman redline (.4) revisions to same and send back to Akerman with comments (1.7)	3.00	495.00	1,485.00
8/23/2024	Megan Murray	B210	Emails with Committee and Kapila Mukamal re accounting meeting	2.10	495.00	1,039.50
8/27/2024	Megan Murray	B210	Email with Caren Deruiter CPT re staff members and contracts; address same and consider issues with certain former employees	0.40	495.00	198.00
8/27/2024	Megan Murray	B210	Review email from committee member and related links. Draft redlines CPT (advance call S Wirth re meeting with Govoni counsel and prepare extensive questions for same (1.4)	0.30	495.00	148.50
8/31/2024	Melissa Sydow	B210		0.10	315.00	31.50
9/4/2024	Megan Murray	B210		1.40	495.00	693.00

9/5/2024	Megan Murray	B210	Communications re C Schoreder matter, review additional documents related to same.	0.30	495.00	148.50
9/5/2024	Megan Murray	B210	Communicate with KMukamal and Akerman re CPT meeting (.2)	0.20	495.00	99.00
9/5/2024	Melissa Sydow	B210	Summarize position of AG attorney as to individuals exposure.	0.20	315.00	63.00
9/6/2024	Megan Murray	B210	Communications with S Wirth re scheduling, CPT changes from Steve Wirth and K McCoy, opt out deadlines (.6)	0.60	495.00	297.00
9/7/2024	Melissa Sydow	B210	Review status of subpoenas served by Trustee to prepare draft of subpoenas from Committee.	0.30	315.00	94.50
9/9/2024	Megan Murray	B210	Email with R Elliott re CPT and deceased beneficiaries (.1) Strategy with MJS regarding CPT meeting and advance same	0.10	495.00	49.50
9/9/2024	Megan Murray	B210	(.4) call with MG, S Wirth and B Long re 3 employees, set up call on Friday to address questions (.3)	0.70	495.00	346.50
9/9/2024	Melissa Sydow	B210	Correspond via telephone conference and email with Committee Member re: his contacts with organizations with collection of attorneys who practice in the area of special needs, including special needs trusts (.5) edit draft of email to organization executive directors (.3) correspond with Kevin McCoy re: upcoming call re: CPT (.1) compose notice of service of 2004 exam subpoena (.2) prepare for today's call with Trustee and CPT and prepare outline of issues to address (.9) compose follow up email to Counsel for Trustee re: status of subpoenas (.2) review draft of CPT motion and edits (.6) attend call with CPT and Trustee re: succession trustees (1.1) follow up call with Megan Murray re: next steps for CPT motion (.2)	4.10	315.00	1,291.50
9/10/2024	Megan Murray	B210	Call with CPT to address plan strategy and timing matters.	0.80	495.00	396.00
9/11/2024	Megan Murray	B210	Review and revise CPT Motion for Winddown (1) Call with SWirth re same (.2)	1.20	495.00	594.00
9/11/2024	Melissa Sydow	B210	Exchange emails with Raye Elliot re: reoccurring call to discuss subpoena status (.2) compose email with attachments to Dan Etlinger re: escrow documents (.1) Prepare for Call with employees (former officers) (1.2) attend call (1) to understand business operations and knowledge at Center. Call with S Wirth re CPT Drafts (.8) communications with S Wirth and K Urbasch re CPT edits, call with S Wirth re same (.3)	0.30	315.00	94.50
9/13/2024	Megan Murray	B210	CPT revisions of extensive edits of motion and opt out	3.30	495.00	1,633.50
9/13/2024	Megan Murray	B210	CSNTA Conference Call with CPT	1.40	495.00	693.00
9/15/2024	Megan Murray	B210	CPT Revisions to Motion, Order, Opt Out	1.00	495.00	495.00
9/24/2024	Megan Murray	B210	Additional emails and calls with NALA member (.3) call with S Wirth re CPT Motion and death residuals negotiation (.2) Call with M Sydow re updates on CPT (.5)	1.80	495.00	891.00
9/27/2024	Megan Murray	B210	Review and Communicate with EPIQ re website edits (.5)	1.00	495.00	495.00
3/26/2024	Megan Murray	B310	review and revise pleading re Motion to Extend Bar date and provide edits to same with additional comments to Exhibit (.8)	1.30	495.00	643.50
4/3/2024	Megan Murray	B310	Review and revise trust account motion, order, communicate with S Wirth and T Dorr re same (.5) communications with committee members re calls with K Mukamal (.4) Review M to Extend bar date (.1) review and send committee members' trust statements to K Mukamal (.3)	1.30	495.00	643.50
4/17/2024	Megan Murray	B310	Email to Epiq re POC Extension	0.10	495.00	49.50
5/1/2024	Melissa Sydow	B310	Strategize to discuss next steps with Epiq (.2) telephone conference and exchange emails with Epiq representative re: website information re: claims (.2) .	2.10	315.00	661.50
5/3/2024	Megan Murray	B310	Review potential sources to assist in recorded POC walk thorough .	0.50	495.00	247.50
5/3/2024	Megan Murray	B310	Communicate with EPIQ re claims	0.20	495.00	99.00
5/3/2024	Melissa Sydow	B310	Review emails from Epiq re: access to claims.	0.10	315.00	31.50

5/6/2024	Adam Gilbert	B310	Create internal call tracker spreadsheet to log incoming calls from unsecured creditors	0.50	350.00	175.00
5/7/2024	Adam Gilbert	B310	Prep for and call with beneficiaries (.8) and update call tracker (.1)	0.90	350.00	315.00
5/7/2024	Daniel Etlinger	B310	Call and email correspondences with Creditor re claim for storage.	0.20	425.00	85.00
5/8/2024	Adam Gilbert	B310	Leave VM with beneficiary and update call tracker	0.10	350.00	35.00
5/9/2024	Daniel Etlinger	B310	Call with creditor re case and claim.	0.20	425.00	85.00
5/9/2024	Megan Murray	B310	Email to committee re obtaining claims from Epiq.	0.10	495.00	49.50
5/10/2024	Adam Gilbert	B310	Call with beneficiary re: claims process (.2) and update call tracker (.1)	0.30	350.00	105.00
5/10/2024	Daniel Etlinger	B310	Return calls and emails from creditors re general case status and proof of claims (.4). Email correspondences with Epiq re script (.2).	0.60	425.00	255.00
5/13/2024	Daniel Etlinger	B310	Call with Epiq re claims process video.	0.20	425.00	85.00
5/14/2024	Daniel Etlinger	B310	Revise potential script for proof of claim filing video based on Epiq conversation.	0.40	425.00	170.00
6/4/2024	Daniel Etlinger	B310	Return calls and emails re proof of claim inquiries.	0.10	425.00	42.50
6/5/2024	Daniel Etlinger	B310	Call with Matt Kish re claim and urgent expenses.	0.20	425.00	85.00
6/12/2024	Daniel Etlinger	B310	Call and email correspondences with creditor re proof of claim filing.	0.40	425.00	170.00
6/12/2024	Daniel Etlinger	B310	Analyze POC presentation and email correspondences with Megan Murray re same.	0.30	425.00	127.50
6/16/2024	Scott Underwood	B310	Analysis and correspondence regarding timing of claims deadline.	0.20	625.00	125.00
6/17/2024	Megan Murray	B310	Review and address Claims Extention / Order and send back to Raye Elliott with comment.	0.40	495.00	198.00
7/8/2024	Megan Murray	B310	Review new claims register for updates.	0.10	495.00	49.50
7/22/2024	Megan Murray	B310	Reivew updated claims register (.1) request updated trust statement for victims (.1)	0.20	495.00	99.00
8/23/2024	Scott Underwood	B310	Telephone conference with attorney for trust beneficiary regarding claim process.	0.20	625.00	125.00
8/27/2024	Megan Murray	B320	Calls re CSNTA with S Wirth and M Goldberg (.8) with MJS (.5) M Rowe re distribution matters for plan (.2) email committee re various topics regarding case updates(.4)	1.90	495.00	940.50
9/13/2024	Megan Murray	B320	Call re Plan and timing of same with Trustee and CRO / Kapila Mukamal	1.00	495.00	495.00

# **EXHIBIT 3**



**Indexing by Task Codes**

<u><b>Task Code</b></u>	<u><b>Description</b></u>	<u><b>Hours</b></u>	<u><b>Amount</b></u>
B110	Case Administration	48.10	17,928.50
B120	Asset Analysis and Recovery	61.20	28,388.50
B130	Asset Dispositiion	3.20	1,305.00
B140	Relief From Stay/Adequate Protection Proceedings	64.20	32,458.50
B150	Meetings of and Communications with Creditors	242.10	117,563.50
B160	Fee/Employment Applications	13.70	6,945.50
B190	Other Contested Matters (excluding assumption/rejection motions)	92.20	45,872.50
B210	Business Operations	90.20	43,484.00
B310	Claims Administration and Objections	11.20	4,757.00
B320	Plan and Disclosure Statement (including Business Plan).	2.90	1,435.50
<b>Totals</b>		<b>629.00</b>	<b>300,138.50</b>

# **EXPENSES**

Date	Description	Amount
9/23/2024	Postage – BK Mail Bankruptcy pleadings mailed to Robert Holmes, III (Docs. 109, 286, 288, 313, 360, POC Form, and Adv. Pro. Docs. 23, 24)	\$2.04
9/23/2024	Postage – BK Mail Correspondence to Robert Holmes, III in response to letters dated September 3 and 16, 2024 and to ensure receipt of relevant legal pleadings and corresp. from the bankruptcy case	\$0.69
9/16/2024	Woodford County property appraiser search- CSNTA research	\$10.00
5/21/2024	Pay.gov – Court filing fee (Doc. 299-Expedited Motion to Determine Automatic Stay does not Exits, or Alternatively for Relief from Stay re: post-petition Payments into Non-Debtor Accounts, on behalf of Creditor Committee Unsecured Creditors' Committee)	\$199.00
5/13/2024	Postage – BK Mail Doc-214-Standing Request for Copies	\$0.64
5/10/2024	Postage – BK Mail (Doc-204-Request for Copies Notice of Issuance of Subpoenas [Doc. No. 187] and Notice of Issuance of Subpoena [Doc. No. 202]; Doc 211-Request for Copies Notice of Issuance of Subpoenas [Doc. No. 209])	\$0.64
		\$213.01