

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--|---|-------------------------|
| In re: | § | |
| | § | Chapter 11 |
| | § | |
| RED RIVER TALC, LLC <i>et al.</i> , ¹ | § | Case No. 24-90505 (CML) |
| | § | |
| Debtor. | § | |
| | § | |

**THIRD MONTHLY FEE STATEMENT OF
PORTER HEDGES LLP, AS CO-COUNSEL TO THE DEBTOR AND
DEBTOR IN POSSESSION, FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM DECEMBER 1, 2024 THROUGH DECEMBER 31, 2024**

| | |
|---|---|
| Name of Applicant: | Porter Hedges LLP, as Co-Counsel to the Debtor |
| Date of Retention: | December 3, 2024 effective as of September 20, 2024 [Docket No. 696] |
| Period for which Fees and Expenses are Incurred: | December 1, 2024 through and including December 31, 2024 |
| Interim Fees Incurred: | \$84,588.00 |
| Interim Payment of Fees Requested (80%): | \$67,670.40 |
| Interim Expenses Incurred: | \$2,049.94 |
| Total Fees and Expenses Due: | \$69,720.34 |

This is the Third Fee Statement.

Porter Hedges LLP (“Porter Hedges”), as Co-Counsel for the Debtor and the Debtor in Possession, submits this *Third Monthly Fee Statement* (the “Fee Statement”) for the period December 1, 2024 through December 31, 2024 (the “Application Period”) in accordance with the

¹ The last four digits of the Debtor’s federal tax identification number are 8508. The Debtor’s address is 501 George Street, New Brunswick, NJ 08933.

Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [Docket No. 521] (the “Interim Compensation Order”).

Porter Hedges requests compensation for professional services rendered in the amount of \$84,588.00 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$2,049.94 (the “Expenses”), during the Application Period. Eighty percent (80%) of the Fees equals \$67,670.40 and one hundred percent (100%) of the Expenses equals \$2,049.94 for a total requested amount of \$69,720.34. Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by Porter Hedges’ attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. Porter Hedges’ invoices for the Application Period are attached hereto as **Exhibit 4**.

Notice

Notice of this Fee Statement will be served upon (i) the Debtor, (a) Red River Talc LLC c/o Accordion Partners, LLC, 1920 McKinney Avenue, Suite 950, Dallas, TX 75201, Attn: John Bittner (jbittner@accordion.com) and (b) Red River Talc LLC, 501 George Street, New Brunswick, NJ 08933, Attn: John K. Kim, Esq., (jkim8@its.jnj.com); (ii) attorneys for the Debtor, (a) Jones Day, 2727 N. Harwood, Dallas, TX 75201, Attn: Dan B. Prieto (dbprieto@jonesday.com), Amanda Rush (asrush@jonesday.com), and Saylor Nolan (snolan@jonesday.com) and (b) Porter Hedges LLP, 1000 Main Street, 36th Floor, Houston, TX 77002, Attn: John F. Higgins, (jhiggins@porterhedges.com), M. Shane Johnson, (sjohnson@porterhedges.com), Megan Young-John, (myoung-john@porterhedges.com), and James A. Keefe, (jkeefe@porterhedges.com); (iii) the United States Trustee for the Southern District of Texas (the “U.S. Trustee”), 515 Rusk Street, Suite 3516, Houston TX 77002, Attn: Ha

Minh Nguyen (ha.nguyen@usdoj.gov), and Jayson B. Ruff, (jayson.b.ruff@usdoj.gov); (iv) counsel to the Debtor's non-debtor affiliates, Johnson & Johnson Holdco (NA) Inc. and Johnson & Johnson, White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020, Attn: Jessica C. Lauria (Boelter), (jessica.boelter@whitecase.com); (v) counsel to any Committee and Future Claimants' Representative appointed in the Chapter 11 Case; and (vi) any other parties that the court may designate. Porter Hedges submits that in light of the relief requested, no other or further notice need be provided.

WHEREFORE, Porter Hedges respectfully requests payment and reimbursement in accordance with the procedures set forth in the Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought), in the amount of \$67,670.40 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$2,049.94 in the total amount of \$69,720.34.

Dated: February 11, 2025

Respectfully submitted,

PORTER HEDGES LLP

By: /s/ John F. Higgins

John F. Higgins (TX Bar No. 09597500)

M. Shane Johnson (TX Bar No. 24083263)

Megan Young-John (TX Bar No. 24088700)

James A. Keefe (TX Bar No. 24122842)

1000 Main St., 36th Floor

Houston, Texas 77002

Telephone: (713) 226-6000

Email: jhiggins@porterhedges.com

sjohnson@porterhedges.com

myoung-john@porterhedges.com

jkeefe@porterhedges.com

Attorneys for Debtor

EXHIBIT 1**SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY**

| Project Category | Total Hours | Total Fees Requested |
|--|--------------------|-----------------------------|
| Case Administration | 3.20 | \$1,488.00 |
| Debtor Meetings and Communications | 1.20 | \$737.50 |
| Hearings | 29.20 | \$17,621.50 |
| Assumption and Rejection of Leases | .40 | \$420.00 |
| Claims Administration and Objections | .70 | \$735.00 |
| Plan and Disclosure Statement and Confirmation | 10.90 | \$8,983.50 |
| Litigation | 23.70 | \$20,514.00 |
| Motions | 41.90 | \$20,467.50 |
| Debtor Fees/Employment Applications | 18.70 | \$11,016.00 |
| Reporting | 3.00 | \$1,551.00 |
| Appeal | 1.50 | \$1,054.00 |
| | | |
| TOTAL | 134.40 | \$84,588.00 |

EXHIBIT 2**SUMMARY OF OUT-OF-POCKET EXPENSES**

| Expenses | Cost |
|----------------------------------|-------------------|
| Computer Assisted Legal Research | \$25.00 |
| Delivery Service | \$82.00 |
| Deposition Expense | \$1,343.30 |
| Service Fee | \$393.00 |
| Working Meals | \$206.64 |
| | |
| TOTAL | \$2,049.94 |

EXHIBIT 3**SUMMARY OF TIME EXPENDED BY ATTORNEYS AND SUPPORT STAFF**

| Professional | Hourly Rate | Total Hours |
|---------------------|--------------------|--------------------|
| Higgins, John | 1050 | 24.70 |
| Johnson, Shane | 835 | 6.60 |
| Keefe, James A. | 625 | 43.80 |
| Sarda, Grecia V. | 500 | 1.20 |
| Webb, Mitzie | 465 | 30.30 |
| Garfias, Eliana | 405 | 26.70 |
| Flinn, Stephanie | 240 | 1.10 |
| | | |
| TOTAL | | 134.40 |

EXHIBIT 4

PORTER HEDGES LLP INVOICES

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510
P.O. BOX 4346
HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573025
Matter Number: 018688-0002
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Case Administration

For professional services rendered and costs incurred through December 31, 2024

| | |
|-------------------------|-------------------|
| Professional Services | 1,488.00 |
| Disbursements | 2,049.94 |
| Total Amount Due | \$3,537.94 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Case Administration

Invoice Date: January 27, 2025
Invoice Num.: 573025
Matter Number: 018688-0002

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-----------------------|-----------------|--|--------------|-------------------|
| 12/03/2024 | MLW | Email exchanges with Jones Day team regarding edits to Notice of Case Management Order. | 0.30 | 139.50 |
| 12/10/2024 | MLW | Travel to courthouse and gather computer for G. Gordon and coordinate delivery to Jones Day Houston office. | 1.40 | 651.00 |
| 12/12/2024 | MLW | Email exchanges and calls with I. Perez regarding copying video to CD for submitting to Court (.8); confer with Litigation Support and outside vendor regarding same (.7). | 1.50 | 697.50 |
| Total | | | 3.20 | \$1,488.00 |
| Total Services | | | | \$1,488.00 |

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-----------------|----------------|-------------------------|--------------|-------------|-------------------|
| MLW | Mitzie L. Webb | Paralegal | 3.20 | 465.00 | 1,488.00 |
| Total | | | 3.20 | | \$1,488.00 |

Cost Summary

| <u>Description</u> | <u>Amount</u> |
|----------------------------------|-------------------|
| Computer Assisted Legal Research | 25.00 |
| Delivery Service | 82.00 |
| Deposition Expense | 1,343.30 |
| Service Fee | 393.00 |
| Working Meals | 206.64 |
| Total Disbursements | \$2,049.94 |

Total This Invoice **\$3,537.94**

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HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573026
Matter Number: 018688-0005
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Debtor Meetings and Communications

For professional services rendered and costs incurred through December 31, 2024

Professional Services 737.50

Total Amount Due \$737.50

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Debtor Meetings and Communications

Invoice Date: January 27, 2025
Invoice Num.: 573026
Matter Number: 018688-0005

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-----------------------|-----------------|--|--------------|-----------------|
| 12/03/2024 | GVS | Email exchanges with J. Keefe regarding legal research on redactions. | 0.10 | 50.00 |
| 12/13/2024 | JAK | Review M. Rasmussen emails regarding upcoming filings and call M. Webb on the same. | 0.30 | 187.50 |
| 12/19/2024 | JAK | Review D. Merrett's email regarding expected filing in adversary proceeding. | 0.10 | 62.50 |
| 12/22/2024 | JAK | Review I. Perez's email regarding expected filing on 12/23 (.1); exchange emails with M. Webb regarding the same (.2). | 0.30 | 187.50 |
| 12/27/2024 | JAK | Email G. Sarda regarding upcoming deadlines and events in case. | 0.30 | 187.50 |
| 12/28/2024 | JAK | Email Jones Day team regarding G. Sarda assisting with filing matters in case. | 0.10 | 62.50 |
| Total | | | 1.20 | \$737.50 |
| Total Services | | | | \$737.50 |

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|---------------------------|-----------------|-------------------------|--------------|-------------|-----------------|
| JAK | James A. Keefe | Associate | 1.10 | 625.00 | 687.50 |
| GVS | Grecia V. Sarda | Associate | 0.10 | 500.00 | 50.00 |
| Total | | | 1.20 | | \$737.50 |
| Total Disbursements | | | | | \$0.00 |
| Total This Invoice | | | | | \$737.50 |

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TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573027
Matter Number: 018688-0006
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Hearings

For professional services rendered and costs incurred through December 31, 2024

Professional Services 17,621.50

Total Amount Due \$17,621.50

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Hearings

Invoice Date: January 27, 2025
Invoice Num.: 573027
Matter Number: 018688-0006

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|--|--------------|---------------|
| 12/02/2024 | MSJ | Attend hearing on preliminary injunction. | 1.30 | 1,085.50 |
| 12/02/2024 | GVS | Confer with J. Higgins and J. Keefe regarding attendance at 12/2 hearing (.3). | 0.30 | 150.00 |
| 12/02/2024 | JFH | Attend hearing on extension of stay (1.3); email Jones Day team and M. Webb regarding hearing transcript (.1). | 1.40 | 1,470.00 |
| 12/02/2024 | MLW | Handle courthouse logistics (1.1); attend hearing (1.3); receive/circulate November 26th hearing transcript (.1). | 2.50 | 1,162.50 |
| 12/03/2024 | MLW | Email exchange with Court Transcriber regarding status of December 2nd hearing transcript. | 0.10 | 46.50 |
| 12/04/2024 | MLW | Receive/circulate December 2nd hearing transcript. | 0.10 | 46.50 |
| 12/10/2024 | JAK | Attend status conference on scheduling (1.8); enter notice of appearance for status conference (.1). | 1.90 | 1,187.50 |
| 12/10/2024 | MLW | Attend hearing. | 1.80 | 837.00 |
| 12/11/2024 | JAK | Confer with M. Webb regarding scheduling conference set for 12/17. | 0.10 | 62.50 |
| 12/13/2024 | MLW | Receive and circulate December 10th hearing transcript (.1); email exchanges with Jones Day team regarding logistics for December 17th hearing (.3) | 0.40 | 186.00 |
| 12/16/2024 | JAK | Exchange emails with I. Perez and Porter Hedges team regarding witness and exhibit list for 12/17 hearing (.7); email I. Perez regarding agenda (.1); exchanged emails with M. Webb and S. Johnson regarding agenda (.4); email J. Higgins regarding 12/17 hearing (.1); review I. Perez's email with draft of witness and exhibit list (.1); review witness and exhibit list and email M. Webb and E. Garfias (.2). | 1.60 | 1,000.00 |
| 12/16/2024 | MLW | Email exchanges regarding witness/exhibit list for December 17th hearing (.3); receive/review and file (.4); email exchanges regarding matters set for hearing (.3). | 1.00 | 465.00 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Hearings

Invoice Date: January 27, 2025
Invoice Num.: 573027
Matter Number: 018688-0006

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-----------------------|-----------------|---|--------------|--------------------|
| 12/17/2024 | MSJ | Attend portion of status conference on discovery and confirmation schedule. | 2.50 | 2,087.50 |
| 12/17/2024 | JAK | Assemble relevant documents to prepare for 12/17 hearing (.2); attend 12/17 hearing (4.4). | 4.60 | 2,875.00 |
| 12/17/2024 | MLW | Coordinate hearing logistics and attend hearing (4.4); draft and notice request for hearing transcript (.2). | 4.60 | 2,139.00 |
| 12/18/2024 | JAK | Exchange emails with J. Higgins regarding 12/17 hearing. | 0.60 | 375.00 |
| 12/19/2024 | JAK | Review docket for audio for 12/17 hearing and email M. Webb on the same (.3); review M. Webb's email with transcript of 12/17 hearing attached (.1); review 12/17 transcript (.3). | 0.70 | 437.50 |
| 12/19/2024 | MLW | Receive and circulate December 17th hearing transcript. | 0.10 | 46.50 |
| 12/23/2024 | JAK | Review Court's calendar and email I. Perez regarding witness and exhibit list for hearing on Morelli motion (.2); review M. Webb's email regarding witness and exhibit list and email I. Perez on the same (.3); review A. Rush's email regarding hearing (.1). | 0.60 | 375.00 |
| 12/23/2024 | MLW | Email exchange with J. Keefe regarding deadline to file witness/exhibit list December 27th hearing. | 0.10 | 46.50 |
| 12/26/2024 | MLW | Email exchanges with Jones Day team regarding hearings set for December 27th (.3); confer with Court Case Manager regarding same (.2). | 0.50 | 232.50 |
| 12/27/2024 | JAK | Make notice of electronic appearance (.1); attend hearing on oral ruling on assertions of mediation and common interest privileges (1.1). | 1.20 | 750.00 |
| 12/27/2024 | MLW | Attend virtual ruling hearing and submit request for copy of transcript. | 1.20 | 558.00 |
| Total | | | 29.20 | \$17,621.50 |
| Total Services | | | | \$17,621.50 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Hearings

Invoice Date: January 27, 2025
Invoice Num.: 573027
Matter Number: 018688-0006

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-----------------|------------------|-------------------------|--------------|-------------|--------------------|
| JFH | John F. Higgins | Partner | 1.40 | 1,050.00 | 1,470.00 |
| MSJ | M. Shane Johnson | Partner | 3.80 | 835.00 | 3,173.00 |
| JAK | James A. Keefe | Associate | 11.30 | 625.00 | 7,062.50 |
| GVS | Grecia V. Sarda | Associate | 0.30 | 500.00 | 150.00 |
| MLW | Mitzie L. Webb | Paralegal | 12.40 | 465.00 | 5,766.00 |
| Total | | | 29.20 | | \$17,621.50 |

Total Disbursements \$0.00

Total This Invoice \$17,621.50

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510
P.O. BOX 4346
HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573028
Matter Number: 018688-0011
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Assumption and Rejection of Leases and Contracts

For professional services rendered and costs incurred through December 31, 2024

Professional Services 420.00

Total Amount Due \$420.00

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Assumption and Rejection of Leases and
Contracts

Invoice Date: January 27, 2025
Invoice Num.: 573028
Matter Number: 018688-0011

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|--------------|-----------------|---|--------------|-----------------|
| 12/26/2024 | JFH | Email Jones Day team and M. Webb regarding motion to assume reimbursement agreement. | 0.20 | 210.00 |
| 12/27/2024 | JFH | Email Jones Day team and E. Garfias regarding motion to assume reimbursement agreement. | 0.20 | 210.00 |
| Total | | | 0.40 | \$420.00 |

Total Services **\$420.00**

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-----------------|-----------------|-------------------------|--------------|-------------|-----------------|
| JFH | John F. Higgins | Partner | 0.40 | 1,050.00 | 420.00 |
| Total | | | 0.40 | | \$420.00 |

Total Disbursements \$0.00

Total This Invoice **\$420.00**

PORTER HEDGES LLP

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HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573029
Matter Number: 018688-0014
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Claims Administration and Objections

For professional services rendered and costs incurred through December 31, 2024

Professional Services 735.00

Total Amount Due \$735.00

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
 MANAGEMENT
 Matter: Claims Administration and Objections

Invoice Date: January 27, 2025
 Invoice Num.: 573029
 Matter Number: 018688-0014

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|--------------|-----------------|--|--------------|-----------------|
| 12/03/2024 | JFH | Email I. Perez and J. Keefe regarding claims administrator and motion to seal. | 0.40 | 420.00 |
| 12/23/2024 | JFH | Email Jones Day team, J. Keefe and M. Webb regarding Archer and claims administration. | 0.30 | 315.00 |
| Total | | | 0.70 | \$735.00 |

Total Services **\$735.00**

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-----------------|-----------------|-------------------------|--------------|-------------|-----------------|
| JFH | John F. Higgins | Partner | 0.70 | 1,050.00 | 735.00 |
| Total | | | 0.70 | | \$735.00 |

Total Disbursements \$0.00

Total This Invoice **\$735.00**

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

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HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573030
Matter Number: 018688-0016
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Plan and Disclosure Statement and Confirmation

For professional services rendered and costs incurred through December 31, 2024

Professional Services 8,983.50

Total Amount Due \$8,983.50

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Plan and Disclosure Statement and Confirmation

Invoice Date: January 27, 2025
Invoice Num.: 573030
Matter Number: 018688-0016

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|---|--------------|---------------|
| 12/05/2024 | JFH | Review order and email Jones Day team and M. Webb regarding confirmation hearing deadlines. | 0.20 | 210.00 |
| 12/06/2024 | MSJ | Review reply in support of Disclosure Statement approval. | 1.40 | 1,169.00 |
| 12/06/2024 | JFH | Review truck insurance objection to confirmation and email regarding same. | 0.30 | 315.00 |
| 12/08/2024 | JFH | Email D. Prieto, I. Perez and M. Webb regarding motion to change votes (.4); conference call with M. Webb regarding same (.1). | 0.50 | 525.00 |
| 12/08/2024 | JAK | Exchange emails with Jones Day team regarding potential filings of revised plan and motions. | 0.30 | 187.50 |
| 12/09/2024 | MSJ | Review revised Plan. | 1.20 | 1,002.00 |
| 12/09/2024 | JAK | Review P. Lombardi's email regarding second amended plan and respond thereto (.3); review P. Lombardi's email with revised Schedule 3 (.1); prepare second amended plan for filing and email M. Webb and E. Garfias (.2); review P. Lombardi's email regarding notice of redlines of plan (.1); review notice of redline and email M. Webb and E. Garfias (.2). | 0.90 | 562.50 |
| 12/09/2024 | JFH | Email Jones Day team and J. Keefe regarding second amended plan and schedules (.3); email Jones Day team regarding redlines and notices (.2); Email Jones day team and E. Garfias regarding motion to change votes (.3). | 0.80 | 840.00 |
| 12/09/2024 | EG | Correspondence on filing logistics of 2nd amended prepackaged chapter 11 plan along with notice of redline (.3); monitor emails for status of same (.6); discuss filing with M. Webb (.1); receive, review, and electronically file same with court (.2); download and circulate filed version (.1); update file (.1); follow up emails on submission of same (.1). | 1.50 | 607.50 |
| 12/10/2024 | JFH | Email Jones Day team regarding motion to change votes | 2.30 | 2,415.00 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Plan and Disclosure Statement and Confirmation

Invoice Date: January 27, 2025
Invoice Num.: 573030
Matter Number: 018688-0016

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|--------------|-----------------|---|--------------|-------------------|
| | | and declarations (.5); email and conference call with M. Webb regarding same (.2); attend status conference regarding sealed order and discovery issues (1.6). | | |
| 12/13/2024 | JAK | Review P. Lombardi's email regarding filing amended plan exhibits (.1); attempt to call P. Lombardi (.1); email P. Lombardi regarding filing amended exhibits (.1); arrange call with K. Nelson (FTC) (.1); email S. Ewing regarding publication notice (.1). | 0.50 | 312.50 |
| 12/15/2024 | JAK | Review P. Lombardi's email regarding amended plan. | 0.10 | 62.50 |
| 12/23/2024 | JAK | Review M. Webb's email regarding schedule for confirmation (.1); review transcript from prior hearing and confirm schedule with M. Webb (.3). | 0.40 | 250.00 |
| 12/30/2024 | JFH | Email Jones Day team and G. Sarda regarding motion to change votes. | 0.20 | 210.00 |
| 12/31/2024 | JFH | Review Coalition objection to vote change and email regarding same. | 0.30 | 315.00 |
| Total | | | 10.90 | \$8,983.50 |

Total Services **\$8,983.50**

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-----------------|------------------|-------------------------|--------------|-------------|-------------------|
| JFH | John F. Higgins | Partner | 4.60 | 1,050.00 | 4,830.00 |
| MSJ | M. Shane Johnson | Partner | 2.60 | 835.00 | 2,171.00 |
| JAK | James A. Keefe | Associate | 2.20 | 625.00 | 1,375.00 |
| EG | Eliana Garfias | Paralegal | 1.50 | 405.00 | 607.50 |
| Total | | | 10.90 | | \$8,983.50 |

Total Disbursements \$0.00

Total This Invoice **\$8,983.50**

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510
P.O. BOX 4346
HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573031
Matter Number: 018688-0017
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Litigation

For professional services rendered and costs incurred through December 31, 2024

Professional Services 20,514.00

| | |
|-------------------------|--------------------|
| Total Amount Due | \$20,514.00 |
|-------------------------|--------------------|

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Litigation

Invoice Date: January 27, 2025
Invoice Num.: 573031
Matter Number: 018688-0017

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|---|--------------|---------------|
| 12/01/2024 | JAK | Review D. Merrett's email regarding possible COC for PI litigation (.1); email E. Garfias and M. Webb on the same (.1). | 0.20 | 125.00 |
| 12/02/2024 | JFH | Email G. Gordon and D. Prieto regarding PI hearing (.2); email M. Webb regarding hearing (.1); email D. Prieto, J. Keefe, D. Merrett, and S. Johnson regarding stay order and protected party list (.3). | 0.60 | 630.00 |
| 12/02/2024 | JAK | Review Jones Day and Porter Hedges emails regarding PI/TRO hearing (.2); attend PI/TRO hearing (1.6); review I. Perez and D. Merrett emails regarding revised list of protected parties (.2); review draft of notice of revised list and email J. Higgins and S. Johnson (.3); email D. Merrett regarding noticed of revised list (.1). | 2.40 | 1,500.00 |
| 12/03/2024 | MLW | Email exchanges with Jones Day team regarding corrected protected parties list (.3); receive/review and file notice of same with copy to Court Case Manager (.4). | 0.70 | 325.50 |
| 12/03/2024 | JAK | Review D. Merrett's email regarding notice of corrected protected parties list (.1); review notice and confer with M. Webb (.2); review D. Merrett's email regarding status of PI/TRO order and email M. Webb (.2); review M. Webb's email regarding PI/TRO and email D. Merrett on the same (.2). | 0.70 | 437.50 |
| 12/03/2024 | JFH | Email Jones Day team and M. Webb regarding protected party list (.1); email Jones Day team regarding Travelers motion to compel and objection (.2); email D. Merrett, J. Keefe, and M. Webb regarding PI order (.3). | 0.60 | 630.00 |
| 12/04/2024 | JFH | Review office correspondence of Talc claimants elections to appeal to district court. | 0.20 | 210.00 |
| 12/05/2024 | EG | Correspondence on filing logistics of counter-designations (.2); discuss same with M. Webb (.1). receive, review, and electronically file same with court (.4); download and circulate filed version (.1); update | 0.90 | 364.50 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Litigation

Invoice Date: January 27, 2025
Invoice Num.: 573031
Matter Number: 018688-0017

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|---|--------------|---------------|
| | | file (.1). | | |
| 12/05/2024 | JFH | Email regarding order extending stay (.2); review orders regarding motion to seal and PII (.1); email Jones Day team and M. Webb regarding motion to compel (.2); email Jones Day team and M. Webb regarding motion to compel, motion to seal, and filings (.4); email D. Prieto and A. Rush regarding motion to compel, revisions, and hearing (.3). | 1.20 | 1,260.00 |
| 12/06/2024 | JFH | Review coalition letter to court regarding discovery and email regarding same (.2); email I. Perez and M. Webb regarding vote motion (.3). | 0.50 | 525.00 |
| 12/07/2024 | JFH | Email I. Perez and M. Webb regarding motion. | 0.30 | 315.00 |
| 12/09/2024 | MLW | Email exchanges with Jones Day team regarding response letter to Coalition's response to Debtor's Emergency Motion Compel Beasley Allen to Produce Solicitation Documents (.4); receive/review and coordinate filing of same with E. Garfias (.2); forward copy of same to Case Manager (.1). | 0.70 | 325.50 |
| 12/09/2024 | JFH | Email M. Hirst and D. Torborg regarding coalition letter and response (.3); email G. Gordon, D. Torborg, M. Hirst, J. Keefe, and M. Webb regarding AHC response, letter, and confidential exhibit (.4); email Jones Day team and M. Webb regarding letter and motion to seal (.3). | 1.00 | 1,050.00 |
| 12/10/2024 | JFH | Review Travelers reply to motion to compel and email regarding same. | 0.30 | 315.00 |
| 12/11/2024 | JFH | Email regarding continued hearing. | 0.20 | 210.00 |
| 12/12/2024 | JFH | Review coalition emergency motion for AH service. | 0.20 | 210.00 |
| 12/13/2024 | MSJ | Telephone conference with M. Webb regarding potential motion to compel. | 0.20 | 167.00 |
| 12/13/2024 | JFH | Review notice and email regarding Travelers motion to compel (.2); email Jones Day team and conference call with M. Webb regarding deposition (.3); email M. | 1.90 | 1,995.00 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Litigation

Invoice Date: January 27, 2025
Invoice Num.: 573031
Matter Number: 018688-0017

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|--|--------------|---------------|
| | | Rasmussen regarding motion to strike, letter, motion to compel, and surreply and email and conference call with M. Webb regarding same (.3); email I. Perez and J. Keefe regarding motion to file surreply (.2); conference call with D. Prieto regarding motion to compel and plan (.3); email Jones Day team regarding status report (.1); review coalition motion to compel and motion to seal (.2); email Jones Day team, J. Keefe and E. Garfias regarding motion to strike (.3). | | |
| 12/14/2024 | JFH | Review Beasley Allen status report. | 0.20 | 210.00 |
| 12/15/2024 | JFH | Review AHC of supporting counsel discovery status report and email M. Webb regarding same (.3); email T. Torberg regarding motion to compel and letter (.2). | 0.50 | 525.00 |
| 12/16/2024 | JFH | Email Jones Day team regarding motion to seal and status letter (.5); meeting with M. Webb regarding same (.1); email Jones Day team, J. Keefe, and S. Johnson regarding motion (.2). | 0.80 | 840.00 |
| 12/17/2024 | JFH | Email I. Perez regarding status conference (.2); attend status and discovery conference (1.7). | 1.90 | 1,995.00 |
| 12/18/2024 | JFH | Email Jones Day team and J. Keefe regarding motion to extend removal deadlines and revisions (.3); email J. Keefe regarding motion to compel (.2). | 0.50 | 525.00 |
| 12/19/2024 | JFH | Email and conference call with E. Wade regarding motion to dismiss and plan confirmation hearing (.5); review coalition notice of appeal and email regarding same (.3). | 0.80 | 840.00 |
| 12/20/2024 | JAK | Review D. Merrett's email regarding filing brief in adversary proceeding. | 0.10 | 62.50 |
| 12/20/2024 | JFH | Email D. Merritt regarding brief in support of preserving stay (.3); email M. Webb regarding same (.1); email regarding motion to seal (.1); email regarding Coalition appeal (.1). | 0.60 | 630.00 |
| 12/20/2024 | EG | Correspondence on filing logistics of sealed and public brief ISO preserving stay along with motion to seal (.4); | 2.30 | 931.50 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Litigation

Invoice Date: January 27, 2025
Invoice Num.: 573031
Matter Number: 018688-0017

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|--------------|-----------------|--|--------------|--------------------|
| | | monitor emails for status of same (1.0); receive, review, and electronically file same (.6); download and circulate filed versions (.2); update file (.1). | | |
| 12/22/2024 | JFH | Email I. Perez regarding designation of record. | 0.10 | 105.00 |
| 12/23/2024 | JFH | Email H. Cohen and D. Prieto regarding brief. | 0.20 | 210.00 |
| 12/24/2024 | JFH | Email D. Prieto, S. Johnson and M. Webb regarding Morello and Travelers motions. | 0.30 | 315.00 |
| 12/26/2024 | JFH | Email M. Webb regarding coalition notice of appeal and deadlines (.2); email D. Prieto, M. Hirst, and M. Webb regarding hearing and exhibit list (.3). | 0.50 | 525.00 |
| 12/27/2024 | JFH | Email D. Prieto regarding hearing (.1); email and attend hearing on motion to compel and privilege issues (1.1). | 1.20 | 1,260.00 |
| 12/29/2024 | JFH | Email Jones Day team and G. Sarda regarding emergency motion to compel and motion to seal. | 0.20 | 210.00 |
| 12/30/2024 | JFH | Email Jones Day team, E. Garfias and M. Webb regarding motion to compel and motion to seal and exhibits (.4); email M. Boles and M. Webb regarding hearing (.2). | 0.60 | 630.00 |
| 12/31/2024 | JFH | Email A. Rush and S. Johnson regarding transcript. | 0.10 | 105.00 |
| Total | | | 23.70 | \$20,514.00 |

Total Services **\$20,514.00**

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-----------------|------------------|-------------------------|--------------|-------------|--------------------|
| JFH | John F. Higgins | Partner | 15.50 | 1,050.00 | 16,275.00 |
| MSJ | M. Shane Johnson | Partner | 0.20 | 835.00 | 167.00 |
| JAK | James A. Keefe | Associate | 3.40 | 625.00 | 2,125.00 |
| MLW | Mitzie L. Webb | Paralegal | 1.40 | 465.00 | 651.00 |
| EG | Eliana Garfias | Paralegal | 3.20 | 405.00 | 1,296.00 |
| Total | | | 23.70 | | \$20,514.00 |

Total Disbursements \$0.00

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Litigation

Invoice Date: January 27, 2025
Invoice Num.: 573031
Matter Number: 018688-0017

Total This Invoice **\$20,514.00**

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510
P.O. BOX 4346
HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573032
Matter Number: 018688-0018
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Motions

For professional services rendered and costs incurred through December 31, 2024

Professional Services 20,467.50

Total Amount Due \$20,467.50

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Motions

Invoice Date: January 27, 2025
Invoice Num.: 573032
Matter Number: 018688-0018

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|--------------------|------------------------|--|---------------------|----------------------|
| 12/03/2024 | EG | Correspondence on filing logistics of objection to motion to compel (.2); continuous monitoring of emails for status of same (.8); discuss same with M. Webb (.1). | 1.10 | 445.50 |
| 12/03/2024 | MLW | Email exchanges with Jones Day team regarding Debtor and Johnson and Johnson's Objection to Travelers' Emergency Motion to Compel (.6); confer with J. Keefe and E. Garfias regarding same (.3); receive/review and file same (.4). | 1.30 | 604.50 |
| 12/03/2024 | JAK | Review C. Smith's emails regarding objection to Travelers' motion to compel (.2); review objection and email M. Webb and E. Garfias (.2). | 0.40 | 250.00 |
| 12/04/2024 | EG | Correspondence on filing logistics of OCP declaration (.1); discuss same with M. Webb (.1). | 0.20 | 81.00 |
| 12/05/2024 | EG | Correspondence on filing logistics of public and sealed versions of motion to compel (.3); discuss same with M. Webb (.2). monitor emails for status of same (.5); receive, review, and electronically file same with court (.5); download and circulate filed version (.1); update file (.1). | 1.70 | 688.50 |
| 12/05/2024 | MLW | Email exchanges regarding possible filing of an Emergency Motion to Compel (.5); confer with J. Higgins and S. Johnson regarding same (.3); confer with the Court Manager regarding court's availability for emergency hearing (.3). | 1.10 | 511.50 |
| 12/05/2024 | JAK | Review C. Smith's email regarding motion to compel (.1); review motion to compel and email J. Higgins (.2); email M. Webb and E. Garfias regarding motion to compel (.1); review C. Smith's email regarding revised motion to compel (.1); review revised motion to compel and email M. Webb and E. Garfias (.2); review C. Smith's email regarding motion to seal (.1); review motion to seal and email M. Webb and E. Garfias (.2); review C. Smith's email regarding counter-designations | 1.30 | 812.50 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Motions

Invoice Date: January 27, 2025
Invoice Num.: 573032
Matter Number: 018688-0018

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|--|--------------|---------------|
| | | (.1); review counter-designations and email M. Webb and E. Garfias (.2). | | |
| 12/06/2024 | GVS | Review and analyze declaration for OCP motion in preparation for filing. | 0.30 | 150.00 |
| 12/06/2024 | EG | Correspondence on logistics of anticipated filing (.2); monitor emails for status of same (1.8); receive, review, and electronically file same with court (.2); download and circulate filed version (.1); update file (.1). | 2.40 | 972.00 |
| 12/08/2024 | MLW | Email exchanges with I. Perez regarding potential filing of a motion. | 0.20 | 93.00 |
| 12/09/2024 | JAK | Review Jones Day and Porter Hedges emails regarding filing letter response (.4); review C. Smith's email regarding filing public letter (.1); review public letter and email M. Webb and E. Garfias (.2); review C. Smith's email regarding sealed version of letter (.1); review sealed letter and email M. Webb and E. Garfias (.2); review C. Smith's email regarding motion to seal (.1); review motion to seal and email M. Webb and E. Garfias (.2); review I. Perez's email regarding motion to change votes (.1); review motion to change votes and email M. Webb and E. Garfias (.3). | 1.70 | 1,062.50 |
| 12/09/2024 | MLW | Email exchanges with Jones Day regarding Motion to Change Vote (.3); receive/review and coordinate filing of same (.3); docket deadline to object and file CNO (.1). | 0.70 | 325.50 |
| 12/10/2024 | JAK | Review C. Smith's email regarding Morelli declaration (.1); review declaration (.2). | 0.30 | 187.50 |
| 12/10/2024 | MLW | Email exchanges with Jones Day team regarding filing Morelli Declaration (.3); confer with J. Higgins regarding same (.2); receive/review and file (.3). | 0.80 | 372.00 |
| 12/10/2024 | EG | Correspondence on filing logistics of OCP declaration (.2); receive, review, and electronically file same with court (.2); download and circulate filed version (.1); update file (.1); follow up emails on submission of same | 0.70 | 283.50 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Motions

Invoice Date: January 27, 2025
Invoice Num.: 573032
Matter Number: 018688-0018

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|--|--------------|---------------|
| | | (.1). | | |
| 12/13/2024 | JAK | Review I. Perez's email regarding motion for leave for surreply (.1); email I. Perez regarding status of motion to strike experts (.1); confer with I. Perez and E. Garfias regarding expected timing for filings (.3); review Jones Day team's multiple emails regarding motion to strike experts (.3); review motion to strike experts and email E. Garfias (.3). | 1.10 | 687.50 |
| 12/13/2024 | MLW | Gather/circulate Coalition's Supplemental Emergency Motion for Alternative Service. | 0.10 | 46.50 |
| 12/13/2024 | EG | Correspondence on filing logistics of (i) status report, (ii) sur-reply, (iii) motion to strike, (iv) motion to compel, (v) PH's monthly fee statements (.4); monitor emails for status of same (1.6); receive, review, and electronically file motion to strike (.3); download and circulate same (.1); update file (.1). | 2.50 | 1,012.50 |
| 12/14/2024 | MLW | Forward Debtor's Emergency Motion to Strike to Court Case Manager. | 0.10 | 46.50 |
| 12/15/2024 | JAK | Review D. Torborg's email regarding motion to compel. | 0.10 | 62.50 |
| 12/16/2024 | JAK | Review I. Perez's email regarding expected filings (.1); review I. Perez's email regarding filing letter with court and email M. Webb and E. Garfias (.2); review public version of letter and email M. Webb and E. Garfias (.3); review sealed version of letter and email M. Webb and E. Garfias (.3); exchange emails with Jones Day team regarding emailing case manager about sealed filing (.2); review I. Perez's email regarding corrected letter to be filed with court (.1); review corrected letter and email M. Webb and E. Garfias (.2); review S. Nolan's email regarding drafting Jones Day notice of rate increase (.1); review A. Williams email regarding motion to seal letter (.1); review motion to seal and email M. Webb and E. Garfias (.2); review I. Perez's email regarding motion for leave to draft surreply along with surreply (.1); review motion for leave and surreply and email M. Webb and | 4.60 | 2,875.00 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Motions

Invoice Date: January 27, 2025
Invoice Num.: 573032
Matter Number: 018688-0018

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|---|--------------|---------------|
| | | E. Garfias (.4); attend call with M. Webb regarding motion for leave (.1); review local rules and complex case procedures regarding surreply (.2); email J. Higgins and S. Johnson regarding motion for leave (.1); call I. Perez regarding motion for leave (.1); review L. Saber's and I. Perez's email regarding revised motion for leave (.2); review revised motion for leave and email E. Garfias and M. Webb (.4); review S. Nolan's email regarding Jones Day notice of rate increase (.1); review notice of rate increase and email M. Webb and E. Garfias (.2); call M. Webb regarding objection to motion to compel testimony (.2); review M. Bales email regarding motion to compel (.1); review public and sealed versions of objection to motion to compel and email M. Webb and E. Garfias (.3); review M. Bales email regarding motion to seal (.1); review motion to seal and email M. Webb and E. Garfias (.2). | | |
| 12/16/2024 | MLW | Email exchanges regarding Debtor's Objection to Coalition's Emergency Motion to Compel and Motion to Seal (.2); confer with J. Keefe and E. Garfias regarding same (.2); receive/review and file Motion to Seal (.2). | 0.60 | 279.00 |
| 12/16/2024 | EG | Correspondence on filing logistics of sealed and public letter on discovery and status along with motion to seal (.4); monitor emails for status of same (1.6); receive, review, and electronically file same (.4); download and circulate filed versions (.2); update file (.1); further emails on surreply and motion for leave (.3); receive, review, and electronically file with court (.4); download and circulate filed version (.2); update file (.1); additional email on sealed and public objection to emergency motion to compel (.3); receive, review, and electronically file same with court (.5); download and circulate filed version (.2); update file (.2). | 4.80 | 1,944.00 |
| 12/17/2024 | EG | Correspondence on draft motion to extend removal period. | 0.30 | 121.50 |
| 12/18/2024 | JAK | Review I. Perez's emails regarding draft of removal | 1.60 | 1,000.00 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Motions

Invoice Date: January 27, 2025
Invoice Num.: 573032
Matter Number: 018688-0018

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|--|--------------|---------------|
| | | extension motion (.2); review removal extension motion and email J. Higgins and S. Johnson (.9); review J. Higgins's email regarding removal extension motion and email comments to Jones Day team (.2); review I. Perez's email regarding filing version of extension motion (.1); review extension motion and email M. Webb and E. Garfias (.2). | | |
| 12/18/2024 | MLW | Email exchanges with Jones Day team regarding Motion Extend Removal Period (.4); receive/review and file same (.3); docket deadline to objection and file CNO (.1). | 0.80 | 372.00 |
| 12/23/2024 | JAK | Exchange emails with A. Rush and M. Webb regarding motions to be filed later in week (.2); review and respond to J. Higgins's email regarding ARCHER motion (.2). | 0.40 | 250.00 |
| 12/23/2024 | MLW | Email exchanges with J. Keefe regarding Motion Establish Claim/Lien Process and Motion Assume Reimbursement Agreement. | 0.20 | 93.00 |
| 12/26/2024 | JAK | Review A. Tawil's email regarding ARCHER motion (.1); review G. Ghaul's email regarding ARCHER motion (.1); review draft of ARCHER motion and email M. Webb and E. Garfias (.3); review M. Webb's email regarding ARCHER motion (.1); review I. Perez's email regarding status of assumption motion (.1); review I. Perez's and G. Ghaul's emails regarding corrected ARCHER motion and respond thereto (.4); review corrected ARCHER motion and email M. Webb (.4). | 1.50 | 937.50 |
| 12/26/2024 | MLW | Email exchanges with Jones Day team regarding Archer Motion (.4); receive and file same (.3); docket deadline to object and file CNO (.1); email exchanges regarding Motion to Assume Reimbursement Agreement (.2). | 1.00 | 465.00 |
| 12/26/2024 | EG | Correspondence on filing logistics of Archer motion (.2); monitor emails for status of same (1.0); follow up with M. Webb on submission of same (.1); further emails on filing of reimbursement motion (.2). | 1.50 | 607.50 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Motions

Invoice Date: January 27, 2025
Invoice Num.: 573032
Matter Number: 018688-0018

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|---|--------------|---------------|
| 12/27/2024 | JAK | Review I. Perez's email regarding assumption motion (.1); review assumption motion and email M. Webb and E. Garfias (.3). | 0.40 | 250.00 |
| 12/27/2024 | EG | Correspondence on filing logistics of reimbursement motion (.2); monitor emails for status of same (.8); receive, review, and electronically file same (.4); download and circulate filed version (.1); update file (.1). | 1.60 | 648.00 |
| 12/30/2024 | GVS | Finalize motion to compel for filing (.2); email E. Garfias regarding filing sealed motion (.2); email JD team regarding filing CNO for vote change motion on 12/31 (.1). | 0.50 | 250.00 |
| 12/30/2024 | MLW | Email exchanges and calls with M. Bales regarding upcoming emergency motion to compel for filing and hearing date for same (.5); receive/review emergency motion and organize for filing (.3); confer with E. Garfias regarding filing same (.2). | 1.00 | 465.00 |
| 12/30/2024 | EG | Correspondence on filing logistics of sealed and public motion to compel along with motion to seal (.4); monitor emails for status of same (1.5); discuss same with M. Webb (.2); receive, review, and electronically file same (.6); download and circulate filed versions (.2); update file (.1). | 3.00 | 1,215.00 |

Total **41.90** **\$20,467.50**

Total Services **\$20,467.50**

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-----------------|-----------------|-------------------------|--------------|-------------|--------------------|
| JAK | James A. Keefe | Associate | 13.40 | 625.00 | 8,375.00 |
| GVS | Grecia V. Sarda | Associate | 0.80 | 500.00 | 400.00 |
| MLW | Mitzie L. Webb | Paralegal | 7.90 | 465.00 | 3,673.50 |
| EG | Eliana Garfias | Paralegal | 19.80 | 405.00 | 8,019.00 |
| Total | | | 41.90 | | \$20,467.50 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Motions

Invoice Date: January 27, 2025
Invoice Num.: 573032
Matter Number: 018688-0018

| | |
|---------------------------|--------------------|
| Total Disbursements | \$0.00 |
| Total This Invoice | \$20,467.50 |

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510
P.O. BOX 4346
HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573033
Matter Number: 018688-0027
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Debtor Fees/Employment Applications

For professional services rendered and costs incurred through December 31, 2024

Professional Services 11,016.00

Total Amount Due \$11,016.00

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Debtor Fees/Employment Applications

Invoice Date: January 27, 2025
Invoice Num.: 573033
Matter Number: 018688-0027

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|--|--------------|---------------|
| 12/01/2024 | JAK | Review S. Johnson's email regarding Accordion's first monthly fee statement (.1); review fee statement notice parties and revise Accordion's fee statement and email draft to J. Bittner and M. Garside (.4); review M. Garside's email regarding filing version of fee statement (.1). | 0.60 | 375.00 |
| 12/02/2024 | JFH | Email and conference call with M. Webb regarding PH retention and CNO. | 0.20 | 210.00 |
| 12/02/2024 | MLW | Email exchange regarding filing CNO - Retain Porter Hedges (.4); receive/review and file with copy to Court Case Manager (.3). | 0.70 | 325.50 |
| 12/02/2024 | EG | Correspondence on filing logistics of Accordion's fee statement (.2); receive, review, and electronically file same with court (.3); download and circulate filed version (.1); update file (.1); follow up emails on same (.1). | 0.80 | 324.00 |
| 12/02/2024 | JAK | Review Accordion's fee statement (.2); email M. Garside regarding Accordion's fee statement (.1); email M. Webb regarding Accordion's fee statement (.1); review M. Garside's email with revised fee statement (.1); prepare Accordion's fee statement for filing and email M. Webb and E. Garfias (.2); draft CNO for Porter Hedges' retention application and email M. Webb and E. Garfias (.3). | 1.00 | 625.00 |
| 12/03/2024 | MLW | Gather/circulate entered Order Employ Porter Hedges. | 0.10 | 46.50 |
| 12/03/2024 | JAK | Review I. Perez's email regarding Archer retention application (.1); review and revise PH's first monthly fee statement (1.2); exchange emails with Porter Hedges regarding fee statement (.7); exchange emails with Jones Day team regarding motion to seal retention application names (.5). | 2.50 | 1,562.50 |
| 12/03/2024 | JFH | Email J. Keefe, M. Webb, and S. Johnson regarding fee statements (.2); email regarding retention order and fee | 0.50 | 525.00 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Debtor Fees/Employment Applications

Invoice Date: January 27, 2025
Invoice Num.: 573033
Matter Number: 018688-0027

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|--|--------------|---------------|
| | | statement (.3). | | |
| 12/04/2024 | MLW | Email exchanges with J. Higgins and J. Keefe regarding PH's 1st Monthly Fee Statement (.2); email exchanges with Jones Day team regarding OCP Declaration - Weil, Gotshal (.1); receive/review and file (.2). | 0.50 | 232.50 |
| 12/04/2024 | JAK | Review interim compensation order and email M. Webb on the same (.3); review E. Moreland's email regarding Porter Hedges November fee statement (.1). | 0.40 | 250.00 |
| 12/05/2024 | JAK | Review Porter Hedges November fee statement (1.5); email E. Moreland regarding November fee statement (.1); review I. Perez's email regarding OCP report (.1). | 1.70 | 1,062.50 |
| 12/05/2024 | JFH | Email Jones Day team and M. Webb regarding OCP report. | 0.10 | 105.00 |
| 12/06/2024 | JFH | Email S. Nolan and E. Garfias regarding Faegre OCP. | 0.10 | 105.00 |
| 12/09/2024 | JAK | Review OCP report (.1); email sample OCP report to I. Perez (.2); review I. Perez's email regarding Epiq's supplemental declaration (.1); review supplemental declaration and email M. Webb and E. Garfias (.2). | 0.60 | 375.00 |
| 12/09/2024 | MLW | Email exchanges with E. Moreland regarding PH's 1st Monthly Fee Statement and finalizing same. | 0.20 | 93.00 |
| 12/09/2024 | JFH | Email I. Perez and J. Keefe regarding OCP report. | 0.20 | 210.00 |
| 12/09/2024 | EG | Correspondence on filing logistics of supplemental declaration of claims agent employment (.1); receive, review, and electronically file same with court (.2); download and circulate filed version (.1); update file (.1); follow up emails on submission of same (.1). | 0.60 | 243.00 |
| 12/11/2024 | SMF | Draft and chart fees and expenses for Porter Hedges second monthly fee statement (.7); draft and prepare Porter Hedges second monthly fee statement (.4). | 1.10 | 264.00 |
| 12/11/2024 | JAK | Attend call with M. Webb regarding Porter Hedges fee statements (.2); review M. Webb's email regarding Porter Hedges fee statements (.2). | 0.40 | 250.00 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Debtor Fees/Employment Applications

Invoice Date: January 27, 2025
Invoice Num.: 573033
Matter Number: 018688-0027

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-----------------|--|--------------|---------------|
| 12/11/2024 | MLW | Email exchange with S. Nolan (Jones Day) regarding OCP Declaration for filing (.2); confer with S. Flinn regarding charting PH's fees/expenses for November Monthly Fee Statement (.2); receive/review and forward to Accounting for confirmation of numbers (.2); circulate PH's November Monthly to J. Keefe (.1). | 0.70 | 325.50 |
| 12/12/2024 | JAK | Exchange emails with S. Johnson and M. Webb regarding Porter Hedges fee statements (.5); review Porter Hedges first monthly fee statement and email M. Webb and E. Moreland (1.1); review Porter Hedges second monthly fee statement and email M. Webb and E. Moreland (.7). | 2.30 | 1,437.50 |
| 12/13/2024 | JAK | Review I. Perez's email regarding OCP report (.1); review OCP report and email M. Webb and E. Garfias (.2); review S. Nolan's email regarding notice of rate increase (.1); locate precedent notice and email S. Nolan (.2); review J. Higgins's email regarding Porter Hedges fee statements (.1). | 0.70 | 437.50 |
| 12/13/2024 | JFH | Email I. Perez and conference call with M. Webb regarding OCP report and motion to compel. | 0.30 | 315.00 |
| 12/13/2024 | MLW | Email exchanges with J. Higgins and J. Keefe regarding finalizing/filing PH's 1st and 2nd Monthly Fee Statements (.2); email exchanges regarding OCP Report, receive and file same (.3). | 0.50 | 232.50 |
| 12/16/2024 | JAK | Review J. Higgins's email regarding Porter Hedges fee statements (.1); email M. Webb and E. Garfias regarding Porter Hedges fee statements (.1). | 0.20 | 125.00 |
| 12/16/2024 | MLW | Email exchanges with Jones Day team regarding Notice of Rate Increase. | 0.20 | 93.00 |
| 12/16/2024 | JFH | Email D. Prieto and M. Webb regarding fee statement. | 0.20 | 210.00 |
| 12/17/2024 | JAK | Revise Porter Hedges fee statements and email M. Webb and E. Garfias. | 0.40 | 250.00 |
| 12/17/2024 | MLW | Email exchanges with J. Keefe regarding PH's 1st and 2nd Monthly Fee Statements (.2); receive and file same | 0.70 | 325.50 |

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Debtor Fees/Employment Applications

Invoice Date: January 27, 2025
Invoice Num.: 573033
Matter Number: 018688-0027

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|--------------|-----------------|---|--------------|--------------------|
| | | (.3); docket deadline to object and submit request to Noticing Agent for service (.2). | | |
| 12/17/2024 | EG | Correspondence on PH's monthly fee statements. | 0.20 | 81.00 |
| Total | | | 18.70 | \$11,016.00 |

| | |
|-----------------------|--------------------|
| Total Services | \$11,016.00 |
|-----------------------|--------------------|

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-----------------|--------------------|-------------------------|--------------|-------------|--------------------|
| JFH | John F. Higgins | Partner | 1.60 | 1,050.00 | 1,680.00 |
| JAK | James A. Keefe | Associate | 10.80 | 625.00 | 6,750.00 |
| MLW | Mitzie L. Webb | Paralegal | 3.60 | 465.00 | 1,674.00 |
| EG | Eliana Garfias | Paralegal | 1.60 | 405.00 | 648.00 |
| SMF | Stephanie M. Flinn | Paralegal | 1.10 | 240.00 | 264.00 |
| Total | | | 18.70 | | \$11,016.00 |

| | |
|---------------------|--------|
| Total Disbursements | \$0.00 |
|---------------------|--------|

| | |
|---------------------------|--------------------|
| Total This Invoice | \$11,016.00 |
|---------------------------|--------------------|

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510
P.O. BOX 4346
HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573034
Matter Number: 018688-0032
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Reporting

For professional services rendered and costs incurred through December 31, 2024

Professional Services 1,551.00

Total Amount Due \$1,551.00

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Reporting

Invoice Date: January 27, 2025
Invoice Num.: 573034
Matter Number: 018688-0032

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|--------------|-----------------|--|--------------|-------------------|
| 12/19/2024 | JAK | Email I. Perez regarding November MOR. | 0.20 | 125.00 |
| 12/19/2024 | EG | Correspondence on draft November operating report. | 0.20 | 81.00 |
| 12/20/2024 | JAK | Review I. Perez's emails regarding MOR (.2); process MOR on SimplyAgree and email R. Dickinson (.3); exchange emails with R. Dickinson regarding MOR (.3); prepare MOR for filing and email M. Webb and E. Garfias (.2). | 1.00 | 625.00 |
| 12/20/2024 | MLW | Email exchanges with J. Keefe regarding November MOR; receive and file same. | 1.20 | 558.00 |
| 12/20/2024 | EG | Correspondence on filing logistics of consolidated monthly operating report (.2); electronically file same with court (.1); update file (.1). | 0.40 | 162.00 |
| Total | | | 3.00 | \$1,551.00 |

Total Services **\$1,551.00**

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-----------------|----------------|-------------------------|--------------|-------------|-------------------|
| JAK | James A. Keefe | Associate | 1.20 | 625.00 | 750.00 |
| MLW | Mitzie L. Webb | Paralegal | 1.20 | 465.00 | 558.00 |
| EG | Eliana Garfias | Paralegal | 0.60 | 405.00 | 243.00 |
| Total | | | 3.00 | | \$1,551.00 |

Total Disbursements \$0.00

Total This Invoice **\$1,551.00**

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510
P.O. BOX 4346
HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

RED RIVER TALC, LLC F/K/A LLT MANAGEMENT
ATTN: JOHN KIM
501 GEORGE STREET
NEW BRUNSWICK, NY 08933

Invoice Date: January 27, 2025
Invoice Num.: 573035
Matter Number: 018688-0034
Billing Attorney: John F. Higgins
Tax ID: #74-2174193

Matter: Appeal

For professional services rendered and costs incurred through December 31, 2024

Professional Services 1,054.00

Total Amount Due \$1,054.00

PORTER HEDGES LLP

Client: RED RIVER TALC, LLC F/K/A LLT
MANAGEMENT
Matter: Appeal

Invoice Date: January 27, 2025
Invoice Num.: 573035
Matter Number: 018688-0034

Time Detail

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|--------------|-----------------|---|--------------|-------------------|
| 12/06/2024 | JFH | Email Jones Day team and M. Webb regarding appellee designation of record. | 0.20 | 210.00 |
| 12/11/2024 | JFH | Email regarding deficiency and record (.2); review statement of issues (.1). | 0.30 | 315.00 |
| 12/23/2024 | JAK | Review A. Johnson's emails regarding counter designations for venue appeal (.2); review counter designations and email M. Webb and E. Garfias (.2). | 0.40 | 250.00 |
| 12/23/2024 | MLW | Email exchanges regarding Debtor's Designations for Venue Appeal, receive and file same. | 0.40 | 186.00 |
| 12/26/2024 | MLW | Gather/circulate Clerk's Notice of Appeal, docket deadline for filing designations of record. | 0.20 | 93.00 |
| Total | | | 1.50 | \$1,054.00 |

Total Services **\$1,054.00**

Timekeeper Summary

| <u>Initials</u> | <u>Name</u> | <u>Timekeeper Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-----------------|-----------------|-------------------------|--------------|-------------|-------------------|
| JFH | John F. Higgins | Partner | 0.50 | 1,050.00 | 525.00 |
| JAK | James A. Keefe | Associate | 0.40 | 625.00 | 250.00 |
| MLW | Mitzie L. Webb | Paralegal | 0.60 | 465.00 | 279.00 |
| Total | | | 1.50 | | \$1,054.00 |

Total Disbursements \$0.00

Total This Invoice **\$1,054.00**