

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT  
BRIDGEPORT DIVISION**

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In re:	:	:	Chapter 11
	:	:	
HO WAN KWOK, <i>et al.</i> ,	:	:	Case No. 22-50073 (JAM)
	:	:	
Debtors. <sup>1</sup>	:	:	Jointly Administered
	:	:	
	-----X		

**COVERSHEET FOR FOURTH INTERIM FEE APPLICATION OF  
O'SULLIVAN MCCORMACK JENSEN & BLISS PC**

Interim Application of:	O'Sullivan McCormack Jensen & Bliss PC
Time Period:	September 1, 2024 through December 31, 2024
Bankruptcy Petition Filed:	February 15, 2022
Date of Entry of Retention Order:	August 22, 2023 [Docket No. 2241] (effective as of July 27, 2023).

<b>Amount Requested</b>		<b>Reductions</b>	
Fees:	\$35,485.00	Voluntary Fee Reductions:	none
Expenses:	\$2,421.66	Voluntary Expenses Reductions:	none
<b>Total:</b>	<b>\$37,906.66</b>		

<b>Fees Previously Requested:</b>		<b>Retainer Request:</b>
Requested Fees:	\$227,919.90	None
Awarded Fees:	\$227,919.90	
Paid Fees:	\$227,919.90 <sup>2</sup>	

<b>Expenses Previously Requested:</b>		<b>Expense Detail:</b>
Requested Expenses:	\$7,870.69	Retainer Received: Not applicable
Awarded Expenses:	\$7,870.69	Copies per page cost & total: Not applicable
Paid Expenses:	\$7,870.69	

<sup>1</sup> The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despina, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

<sup>2</sup> As detailed below, with respect to the Application Period, an additional \$28,388.00 in fees and \$2,421.66 in expenses were paid in accordance with the Interim Compensation Order (as defined below) and OMJB's monthly fee statements.

**MONTHLY FEE REQUESTS FOR APPLICATION PERIOD**

<b>Monthly Period Covered</b>	<b>Total Fees (100%)</b>	<b>Requested Fees (80%)</b>	<b>Requested Expenses (100%)</b>	<b>Fees Paid</b>	<b>Expenses Paid</b>	<b>20% Fee Holdback</b>
9/1/24 - 9/30/24	\$11,130.00	\$8,904.00	\$435.94	\$8,904.00	\$435.94	\$2,226.00
10/1/24 - 10/31/24	\$4,145.00	\$3,316.00	\$179.22	\$3,316.00	\$179.22	\$829.00
11/1/24 - 11/30/24	\$9,292.50	\$7,434.00	\$207.48	\$7,434.00	\$207.48	\$1,858.50
12/1/24 - 12/31/24	\$10,917.50	\$8,734.00	\$1,599.02	\$8,734.00	\$1,599.02	\$2,183.50
<b>TOTAL</b>	<b>\$35,485.00</b>	<b>\$28,388.00</b>	<b>\$2,421.66</b>	<b>\$28,388.00</b>	<b>\$2,421.66</b>	<b>\$7,097.00</b>

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT  
BRIDGEPORT DIVISION**

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In re:	:	Chapter 11
	:	
HO WAN KWOK, <i>et al.</i> ,	:	Case No. 22-50073 (JAM)
	:	
Debtors. <sup>1</sup>	:	Jointly Administered
	:	
	-----X	

**FOURTH INTERIM FEE APPLICATION OF O’SULLIVAN MCCORMACK JENSEN  
& BLISS PC, AS SPECIAL INSURANCE COVERAGE COUNSEL, FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR PERIOD FROM  
SEPTEMBER 1, 2024 THROUGH DECEMBER 31, 2024**

Pursuant to sections 105(a), 330, and 331 of title 11 of the United States Code (such title, hereinafter, the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Connecticut (the “Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals, dated August 18, 2023* [Docket No. 2094] (the “Interim Compensation Order”), O’Sullivan McCormack Jensen & Bliss PC (“OMJB”), as special insurance coverage counsel for Genever Holdings LLC (“Genever (US)”), hereby files this *Fourth Interim Application of O’Sullivan McCormack Jensen & Bliss PC, as Special Insurance Coverage Counsel, for Compensation and Reimbursement of Expenses for the Period from*

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<sup>1</sup> The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

*September 1, 2024 through December 31, 2024* (the “Application”). By this Application, OMJB requests interim allowance of professional fees incurred during the period from September 1, 2024 through and including December 31, 2024 (the “Application Period”) in Genever (US)’s chapter 11 case. In support of this Application, OMJB respectfully states as follows:

**JURISDICTION, VENUE, BASES FOR RELIEF, AND COMPLIANCE**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference* from the United States District Court for the District of Connecticut. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The legal predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

3. OMJB believes that this Application, together with the attachments hereto, substantially complies with the Bankruptcy Rules, Local Rule 2016-1, and the *United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the “U.S. Trustee Guidelines”).<sup>2</sup> OMJB respectfully requests a waiver of any of the foregoing requirements not met by this Application.

4. Attached and incorporated herein by reference are the following Exhibits:

- **Exhibit A** contains the Proposed Order granting this Application.
- **Exhibit B** is a timekeeper summary that includes the name, title, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each OMJB individual who provided services during the Application Period;

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<sup>2</sup> OMJB reserves all rights as to the relevance and substantive legal effect of the U.S. Trustee Guidelines with respect to any application for compensation in these chapter 11 cases.

- **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, during the Application Period; and
- **Exhibit D** contains the detail of the fees and expenses incurred during the Application Period.

## **BACKGROUND**

### **I. Chapter 11 Cases**

5. On October 12, 2020, Genever (US) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Bankruptcy Code before the United States Bankruptcy Court for the Southern District of New York (the “SDNY Bankruptcy Court”), thereby commencing case number 20-12411 (JLG). See Chapter 11 Petition [Docket No. 1 in Case No. 22-50592 (JAM)].

6. No trustee or examiner has been appointed in Genever (US)’s case.

7. On February 15, 2022 (the “Petition Date”), Ho Wan Kwok (the “Individual Debtor”) filed a voluntary petition for relief under the Bankruptcy Code in the United States Bankruptcy Court for the District of Connecticut (Bridgeport Division) (the “Court”).

8. On March 21, 2022, the United States Trustee appointed an Official Committee of Unsecured Creditors (the “Committee”) in the Individual Debtor’s chapter 11 case. No examiner has been appointed in the Individual Debtor’s chapter 11 case.

9. On June 15, 2022, the Court entered a memorandum of decision and order [Docket No. 465] (the “Trustee Order”) directing the United States Trustee to appoint a chapter 11 trustee in the Individual Debtor’s chapter 11 case.

10. Pursuant to the Trustee Order, the United States Trustee selected Luc A. Despins as the Trustee. On July 8, 2022, the Court entered an order granting the appointment of Luc A. Despins as trustee (the “Trustee”) in the Individual Debtor’s chapter 11 case

11. On November 3, 2022, the SDNY Bankruptcy Court entered an order transferring the venue of Genever (US)’s chapter 11 case to this Court. *See Memorandum Decision and Order Granting the Joint Motion of (A) Genever Holdings LLC and (B) Luc A. Despins as Chapter 11 Trustee for Estate of Ho Wan Kwok to Transfer, Pursuant to 28 U.S.C. §§ 1408, and 1412 and Bankruptcy Rule 1014(a), Venue of Chapter 11 Case of Genever Holdings LLC to Bankruptcy Court for District of Connecticut* [Docket No. 225 in Case No. 22-50592 (JAM)].

12. The chapter 11 cases of the Individual Debtor, Genever (US), and Genever Holdings Corporation (“Genever (BVI)”) are being jointly administered before this Court for procedural purposes only. *See* Docket No. 1141 in Case No. 22-50073 (JAM).

13. By order entered August 22, 2023, the Court authorized OMJB’s retention as special insurance coverage counsel to Genever (US) [Docket No. 2105] (the “Retention Order”) effective as of July 27, 2023 in Genever (US)’s chapter 11 case. The Retention Order authorizes OMJB to be compensated on an hourly basis and reimbursed for actual and necessary out-of-pocket expenses pursuant to sections 328 and 330 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and such orders as the Court may direct.

## **II. Prior Interim Fee Applications**

14. On February 16, 2024, OMJB filed its *First Interim Fee Application of O’Sullivan McCormack Jensen & Bliss PC, as Special Insurance Coverage Counsel for Compensation and Reimbursement of Expenses for Period From July 27, 2023 Through December 31, 2023* [Docket No. 2928] (the “First Interim Fee Application”), requesting interim allowance of professional fees incurred during the period from July 27, 2023 through and including December 31, 2023 in these chapter 11 cases. On March 20, 2024, the Court granted the First Interim Fee Application.

15. On June 24, 2024, OMJB filed its *Second Interim Fee Application of O’Sullivan McCormack Jensen & Bliss PC, as Special Insurance Coverage Counsel for Compensation and Reimbursement of Expenses for Period From January 1, 2024 Through April 30, 2024* [Docket No. 3279] (the “Second Interim Fee Application”), requesting interim allowance of professional fees incurred during the period from January 1, 2024 through and including April 30, 2024 in these chapter 11 cases. On July 23, 2024, the Court granted the Second Interim Fee Application.

16. On October 15, 2024, OMJB filed its *Third Interim Fee Application of O’Sullivan McCormack Jensen & Bliss PC, as Special Insurance Coverage Counsel for Compensation and Reimbursement of Expenses for Period From May 1, 2024 Through August 31, 2024* [Docket No. 3697] (the “Third Interim Fee Application”), requesting interim allowance of professional fees incurred during the period from May 1, 2024 through and including August 31, 2024 in these chapter 11 cases. On November 13, 2024, the Court granted the Third Interim Fee Application.

### **III. Monthly Fee Statements**

17. On August 18, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 2094 (the “Interim Compensation Procedures Order”), which, among other things, approves procedures for the payment of 80% of fees and 100% of expenses on a monthly basis.

18. In accordance with the Interim Compensation Procedures Order, on October 21, 2024, OMJB filed and served its monthly fee statement [Docket No. 3732] (the “September Fee Statement”) requesting payment of 80% of all fees and 100% of all expenses actually and necessarily incurred for services rendered during the period from September 1, 2024 through September 30, 2024, in the amounts of \$8,904.00 (80% of \$11,130.00) and \$435.94,

respectively. No objections were filed in response to the September Fee Statement.

Accordingly, the estate has paid OMJB \$9,339.94 for fees and expenses with respect to the September Fee Statement.

19. On November 20, 2024, OMJB filed and served its monthly fee statement [Docket No. 3841] (the “October Fee Statement”) requesting payment of 80% of all fees and 100% of all expenses actually and necessarily incurred for services rendered during the period from October 1, 2024 through October 31, 2024, in the amounts of \$3,316.00 (80% of \$4,145.00) and \$179.22, respectively. No objections were filed in response to the October Fee Statement. Accordingly, the estate has paid OMJB \$3,495.22 for fees and expenses with respect to the October Fee Statement.

20. On December 20, 2024, OMJB filed and served its monthly fee statement [Docket No. 3922] (the “November Fee Statement”) requesting payment of 80% of all fees and 100% of all expenses actually and necessarily incurred for services rendered during the period from November 1, 2024 through November 30, 2024, in the amounts of \$7,434.00 (80% of \$9,292.50) and \$207.48, respectively. No objections were filed in response to the November Fee Statement. Accordingly, the estate has paid OMJB \$7,641.48 for fees and expenses with respect to the November Fee Statement.

21. On January 21, 2025, OMJB filed and served its monthly fee statement [Docket No. 3983] (the “December Fee Statement”) requesting payment of 80% of all fees and 100% of all expenses actually and necessarily incurred for services rendered during the period from December 1, 2024 through December 31, 2024, in the amounts of \$8,734.00 (80% of \$10,917.50) and \$1,599.02, respectively. No objections were filed in response to the December



Fee Statement. Accordingly, the estate has paid OMJB \$10,333.02 for fees and expenses with respect to the December Fee Statement.

### **ALLOWANCE REQUEST**

22. The Applicant is applying for compensation pursuant to Sections 330 and 331 of the Bankruptcy Code for legal services performed for Genever (US) during the Application Period.

23. For the Application Period, the Applicant seeks allowance of \$35,485.00 as compensation for services rendered and allowance and reimbursement of \$2,421.66 in expenses incurred in connection with such services. The Applicant devoted 95.1 hours to this case during the Application Period, equating to an overall blended rate of \$373.13.

24. As noted, OMJB has already received payment of \$28,388.00 of the fees incurred during the Application Period and \$2,421.66 of the expenses incurred during the Application Period, such that OMJB is only seeking payment of the remaining 20% of its fees incurred during the Application Period, namely \$7,097.00.

25. Throughout the Application Period, the Applicant maintained records to indicate the name of each professional working on this matter, the time spent on a particular issue, and the nature of the work performed. These records, which describe in detail the services rendered by the Applicant, were created at the approximate time the services were performed.

26. Annexed hereto and made a part hereof as **Exhibit D** is a detailed billing report, upon which this application is based that contains each individual professional's time for Genever (US)'s bankruptcy proceedings, itemizing the dates upon which services were rendered, including a summary of the services on each of such dates by each person rendering the service, the time spent in rendering such service, and the dollar value of such services. The time detail

attached hereto as **Exhibit D** include certain redactions to protect against the disclosure of privileged or confidential information.

### **SUMMARY OF SERVICES RENDERED**

27. OMJB is special insurance coverage counsel for Genever (US) in its pending litigation against American International Group, Inc. (“AIG”) under Adv. Proc. No. 23-5007 (the “AIG Action”). Generally, OMJB represents Genever (US) with respect to insurance coverage advice and litigation services to recover insurance benefits claimed to be due to Genever (US) for losses it sustained as well as to any matters related to the AIG Action.

28. During the Application Period, OMJB continued to work closely with Genever (US) regarding its prosecution of the AIG Action, reviewing documents and pursuing discovery from AIG and nonparties, taking the deposition of Wolfson Insurance, and preparing briefing in connection with a stay of discovery. In addition, OMJB prepared for and attended the status conference with respect to the AIG Action on October 8, 2024, as well as worked with counsel for AIG regarding a scheduling order, including as it relates to expert discovery. Finally, OMJB prepared a substantive response to AIG’s submission of supplemental materials in opposition to Genever (US)’s motion for partial summary judgment in the AIG Action.

29. The work undertaken by OMJB to date has been significant and remains ongoing, with additional work expected in due course.

### **LEGAL AUTHORITY FOR COMPENSATION**

30. All of the professional services for which this award is being sought hereby were rendered solely on behalf of Genever (US) in connection with the chapter 11 cases herein.

31. Applicant respectfully submits that its services have benefited Genever (US) with the expertise and skill required in insurance litigation. The services for which such

compensation is requested were performed for and on behalf of Genever (US). Such services have been necessary to protect and enforce the rights and interests of Genever (US) in connection with these chapter 11 cases. The reasonable value of services rendered by OMJB in these cases is based upon OMJB' usual hourly rates for matters of this nature.

32. Section 330 of the Bankruptcy Code prescribes the general standards for determining the amount of compensation to be paid to professionals. The Applicant submits that the amount sought for the Application Period represents reasonable compensation for professional services rendered based upon the time spent, the nature, the extent, and the value of such services, taking into account the cost of comparable services in a non-bankruptcy case.

33. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court's award of such compensation. Section 330(a) of the Bankruptcy Code provides that, after notice and a hearing, the Court may award a professional employed under 11 U.S.C. § 327 "reasonable compensation for actual, necessary services rendered" and "reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1).<sup>3</sup>

34. In determining the amount of "reasonable compensation," the Court must consider the nature, extent, and value of the services, taking into account all the relevant factors, including the time spent on such services, the rates charged for such services, whether the services were necessary and beneficial, whether the services were performed in a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed, and whether the compensation is reasonable based on the customary

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<sup>3</sup> Under section 328(a) of the Bankruptcy Code, with bankruptcy court approval, a trustee may employ professional persons under section 327(a) of the Bankruptcy Code "on any reasonable terms and conditions of employment, including on a retainer, on an hourly basis, on a fixed or percentage fee basis, or on a contingent fee basis." 11 U.S.C. § 328(a).

compensation charged by comparably skilled practitioners in cases other than cases under the Bankruptcy Code. See 11 U.S.C. § 330(a)(3). The Court enjoys “considerable discretion in determining reasonable fee awards.” *In re Ahead Communication Systems, Inc.*, 395 B.R. 512 (D. Conn. 2008).

35. In assessing the “reasonableness” of the fees requested, the Second Circuit has stated that courts should consider the factors enumerated in *Johnson v. Ga. Highway Express, Inc.*,<sup>4</sup> while also incorporating the “lodestar method.” See *Arbor Hill Concerned Citizens Neighborhood Ass’n v. County of Albany and Albany County Bd. of Elections*, 522 F.3d 182, 190 (2d Cir. 2007) (citing *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714 (5th Cir.1974), *abrogated on other grounds by Blanchard v. Bergeron*, 489 U.S. 87, 92–93, 96 (1989)). The “lodestar method” of calculating the reasonable fee contemplates “the number of hours reasonably expended . . . multiplied by a reasonable hourly rate.” See *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983); *Gisbrecht v. Barnhart*, 535 U.S. 789, 801 (2002); *Perdue v. Kenny A.*, 130 S.Ct. 1662, 1672 (2010); *In re Drexel Burnham Lambert Grp., Inc.*, 133 B.R. 13 (Bankr. S.D.N.Y. 1991). The factors set forth in *Johnson* and *In re First Colonial Corp. of Am.*, 544 F.2d 1291, 1298–99 (5th Cir. 1977) have been adopted by most courts.<sup>5</sup> See *In re Nine Assocs., Inc.*, 76 B.R. 943, 945 (S.D.N.Y. 1987) (adopting *First Colonial/Johnson* analysis); *In re Cuisine*

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<sup>4</sup> The twelve *Johnson* factors are (1) the time and labor required, (2) the novelty and difficulty of the questions, (3) the skill requisite to perform the legal service properly, (4) the preclusion of other employment by the attorney due to acceptance of the case, (5) the customary fee, (6) whether the fee is fixed or contingent, (7) the time limitations imposed by the client or the circumstances, (8) the amount involved and the results obtained, (9) the experience, reputation, and ability of the attorneys, (10) the “undesirability” of the case, (11) the nature and length of the professional relationship with the client, and (12) awards in similar cases. *Johnson*, 488 F.2d at 717-19.

<sup>5</sup> The factors articulated in *First Colonial* were first articulated by the Fifth Circuit in *Johnson*, with the *First Colonial* court adding the factor of the “spirit of economy,” which was later rejected by Congress. See *Stroock & Stroock & Lavan v. Hillsborough Holdings Corp. (In re Hillsborough Holdings Corp.)*, 127 F.3d 1398, 1403 (11th Cir. 1997).

*Magazine, Inc.*, 61 B.R. 210, 212–13 (Bankr. S.D.N.Y. 1986) (same); *Green v. City of New York*, 403 F. Appx. 626, 629 (2d Cir. 2010) (summary order); *see generally* 3 COLLIER ON BANKRUPTCY ¶ 330.03[9] (Lawrence P. King ed., 16th ed. 2016) (describing *First Colonial* and *Johnson* as the “leading cases with regard to the factors to be considered in determining a reasonable allowance of compensation”).

36. In accordance with the factors enumerated in section 330 of the Bankruptcy Code and applicable case law, the amount requested herein by OMJB is fair and reasonable.

### **STATUTORY COMPLIANCE**

38. No agreement or understanding exists between OMJB and any other person for the sharing of compensation received or to be received for services rendered in or in connection with this matter. OMJB will not, in any form or guise, share or agree to share compensation for services with any person, nor will OMJB share in the compensation for any other person rendering service in these cases, except as so provided by Section 504(b) of the Bankruptcy Code and Rule 2016 of the Bankruptcy Rules.

### **RESERVATION OF RIGHTS**

39. To the extent that time or disbursement charges for services rendered or expenses incurred during the Application Period are not included in this Application, or OMJB has for any reason not sought compensation or reimbursement with respect to such services, OMJB reserves the right to request compensation and reimbursement for such services in a supplemental or future application in these chapter 11 cases. Also, OMJB does not waive, and expressly reserves, its right to respond to any objections regarding this Application and the amounts sought for services rendered and expenses incurred.

**NO PRIOR REQUEST**

40. No previous request for the relief sought herein has been made to this Court or any other court.

*[THE REMAINDER OF THIS PAGE IS INTENTIONALLY BLANK.]*

**WHEREFORE**, OMJB respectfully requests entry of an order, substantially in the form attached hereto, (i) allowing interim compensation for professional services rendered during the Application Period in the amount of \$35,485.00 and reimbursement of \$2,421.66 in expenses, (ii) authorizing and directing prompt payment of fees and expenses from the estate, to the extent not already paid, (iii) allowing such compensation and payment for professional services rendered without prejudice to OMJB's right to seek further compensation and/or payment from the estates for the full value of services performed and expenses incurred, and (iv) granting OMJB such other and further relief as is just.

Dated: February 24, 2025  
Glastonbury, Connecticut

By: /s/ Michael T. McCormack  
Michael T. McCormack (ct13799)  
O'Sullivan McCormack Jensen & Bliss PC  
180 Glastonbury Boulevard, Suite 210  
Glastonbury, CT 06033  
Tel: 860-258-1993  
Fax: 860-258-1991  
mmccormack@omjblaw.com

*Special Insurance Coverage Counsel for  
Debtor-In-Possession Genever Holdings  
LLC*





Dated: February 24, 2025  
New York, New York

By: /s/ G. Alexander Bongartz  
G. Alexander Bongartz (*pro hac vice*)  
Douglass Barron (*pro hac vice*)  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, New York 10166  
(212) 318-6000  
alex bongartz@paulhastings.com  
douglassbarron@paulhastings.com

*Counsel for Genever Holdings LLC*

**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT  
BRIDGEPORT DIVISION**

	-X	
	:	
In re:	:	Chapter 11
	:	
HO WAN KWOK, <i>et al.</i> ,	:	Case No. 22-50073 (JAM)
	:	
Debtors. <sup>1</sup>	:	Jointly Administered
	:	
	-X	

**[PROPOSED] ORDER GRANTING FOURTH INTERIM FEE APPLICATION OF  
O’SULLIVAN MCCORMACK JENSEN & BLISS PC, AS SPECIAL INSURANCE  
COVERAGE COUNSEL, FOR COMPENSATION AND REIMBURSEMENT OF  
EXPENSES FOR PERIOD FROM SEPTEMBER 1, 2024  
THROUGH DECEMBER 31, 2024**

Upon consideration of the Application (the “Application”) of O’Sullivan McCormack Jensen & Bliss PC (“OMJB”), as special insurance coverage counsel for Genever Holdings LLC (“Genever (US)”),<sup>2</sup> for interim allowance of compensation and reimbursement of expenses from September 1, 2024 through December 31, 2024; and sufficient notice having been given; and a hearing having been held on \_\_\_\_\_, 2025 and due consideration having been given to any responses thereto; and sufficient cause having been shown therefor, it is hereby:

1. ORDERED that the Application is granted, pursuant to 11 U.S.C. §§ 330 and 331, and compensation in the amount of \$35,485.00 and reimbursement of expenses in the amount of

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<sup>1</sup> The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

<sup>2</sup> Capitalized terms not otherwise defined herein adopt the definitions set forth in the Application.

\$2,421.66 are awarded to OMJB, subject to final adjustment and disgorgement in the event all administrative expenses are not paid in full; it is further

2. ORDERED that nothing herein modified the Retention Order; it is further

3. ORDERED that the estates are authorized and directed to pay OMJB's fees in the amount of \$7,097.00, *i.e.*, 20% of the fees allowed in paragraph 1 above, within fourteen days of the date of this Order; it is further

4. ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order; it is further

5. ORDERED that Genever (US)'s estate and OMJB are authorized and empowered to take all necessary actions to implement the relief granted in this Order; it is further

6. ORDERED that notwithstanding the possible applicability of Bankruptcy Rules 6006(d), 7062, 9014, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry; and it is further

7. ORDERED that all time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

**EXHIBIT B****Timekeeper Summary**

<b>TIMEKEEPER</b>	<b>DATE OF FIRST BAR ADMISSION</b>	<b>TITLE</b>	<b>HOURS</b>	<b>HOURLY RATE</b>	<b>TOTAL</b>
Timothy P. Jensen	1997	Shareholder	28.2	\$450.00	\$12,690.00
Michael T. McCormack	1993	Shareholder	27.2	\$400.00	\$10,880.00
Amy E. Markim	2008	Shareholder	30.9	\$350.00	\$10,815.00
Melissa Gambardella		Paralegal	8.8	\$125.00	\$1,100.00
		<b>Total</b>	<b>95.1</b>		<b>\$35,485.00</b>

**Blended Hourly Rate: \$373.13**

**EXHIBIT C****Summary of Actual and Necessary Expenses**

<b>Expense Category</b>	<b>Amount (US\$)</b>
PACER	\$9.10
Copying	\$57.20
Westlaw	\$453.33
Fees Advanced to Logikcull	\$709.78
Fees Advanced to Veritext (transcript)	\$1,192.25
<b>TOTAL</b>	<b>\$2,421.66</b>

**EXHIBIT D**

**Fee and Expense Detail**



O'Sullivan McCormack Jensen & Bliss <sup>PC</sup>  
Attorneys at Law

180 Glastonbury Boulevard, Suite 210  
Glastonbury, CT 06033  
Phone: 860-258-1993  
www.omjblaw.com

## INVOICE

Invoice No. 28156  
Date: 10/15/2024

Genever Holdings LLC  
c/o Luc Despins, Esq.  
Paul Hastings LLP  
200 Park Avenue  
New York, NY 10166

### 3726-001-Genever Holdings/AIG Property Casualty

#### Services

Date	Attorney	Activity	Time	Rate	Total
09/02/2024	TPJ	Review background scheduling filings and orders; outline for modifying discovery schedule and specifically damages experts	1.00	\$450.00	\$450.00
09/03/2024	MTM	Revise and supplement draft motion re stay of expert discovery	0.40	\$400.00	\$160.00
09/03/2024	TPJ	Drafting motion to modify first level of expert discovery	1.00	\$450.00	\$450.00
09/04/2024	TPJ	Revise motion to modify discovery schedule	0.30	\$450.00	\$135.00
09/05/2024	TPJ	Communications re motion to modify discovery schedule; Revise motion and finalize	1.00	\$450.00	\$450.00
09/10/2024	MTM	Telephone conference and email communications with L. Despins re REDACTED	0.20	\$400.00	\$80.00
09/11/2024	MTM	Review order re status conference re discovery	0.10	\$400.00	\$40.00
09/11/2024	MTM	Email communications with AIG counsel re status conference issues	0.10	\$400.00	\$40.00
09/12/2024	MTM	Review of AIG Opposition to Motion to Stay; email correspondence with L. Despins re REDACTED	0.30	\$400.00	\$120.00
09/13/2024	TPJ	Review and analysis of AIG objection to motion to extend	0.30	\$450.00	\$135.00
09/16/2024	MBG	Draft August OMJB Fee Statement and begin redactions of invoice exhibit to same.	0.40	\$125.00	\$50.00
09/16/2024	TPJ	Review fee application; communications re reply brief	0.30	\$450.00	\$135.00
09/17/2024	MTM	Review and analysis of AIG motions to continue status conference and motion to depose Kwok; email correspondence with Attny Despins re REDACTED	0.30	\$400.00	\$120.00



09/18/2024	TPJ	Review motion to depose Kwok. Outlining response to objection to extending expert discovery.	1.50	\$450.00	\$675.00
09/18/2024	MTM	Review of AIG motion to depose Kwok; email correspondence to L. Despins re REDACT...	0.20	\$400.00	\$80.00
09/19/2024	TPJ	Review cases cited by AIG in objection; additional research re REDACTED REDACTED	3.90	\$450.00	\$1,755.00
09/20/2024	MTM	Revise and supplement fee application and redacted invoice in support	0.20	\$400.00	\$80.00
09/20/2024	MBG	Attention to further redactions to OMJB August 2024 invoice and finalize Fee Application.	0.20	\$125.00	\$25.00
09/20/2024	MBG	Attention to E-file and service of OMJB August 2024 Fee Application on Notice Parties.	0.20	\$125.00	\$25.00
09/23/2024	TPJ	Draft reply brief to opposition to motion, for motion to compel and in support of motion to extend expert deadlines	5.00	\$450.00	\$2,250.00
09/24/2024	MTM	Review draft reply to AIG memorandum in opposition to motion to stay expert discovery.	0.20	\$400.00	\$80.00
09/24/2024	TPJ	Continue drafting reply brief to opposition to motion, for motion to compel and in support of motion to extend expert deadlines (2.1); review REDACTED REDACTED REDACTED (2.8)	4.90	\$450.00	\$2,205.00
09/25/2024	MTM	Revise and supplement draft reply to AIG opposition to motion to stay (1.2); review and analysis of case re REDACTED REDACTED (.5); email communications with L. Despins re REDACTED REDACTED (.2)	1.90	\$400.00	\$760.00
09/25/2024	TPJ	Revise reply brief	0.50	\$450.00	\$225.00
09/26/2024	MTM	Attention to revision to reply brief re stay of discovery and summary judgment issues	0.20	\$400.00	\$80.00
09/26/2024	MBG	Review and finalize Reply to AIG's Opposition to Motion to Stay.	0.60	\$125.00	\$75.00
09/26/2024	TPJ	Communications re reply brief; revisions to reply brief	1.00	\$450.00	\$450.00
				<b>Services Subtotal</b>	<b>\$11,130.00</b>

## Expenses

Type	Date	Activity	Total
Expense	09/04/2024	Fees advanced to Logikcull INV270179 8/1/2024 - 8/31/2024	\$191.66
Expense	09/30/2024	Westlaw: Month of September	\$235.68
Expense	09/30/2024	PACER: Month of September	\$8.60
Expenses Subtotal			\$435.94

Time Keeper	Time	Rate	Total
Timothy Jensen	20.7	\$450.00	\$9,315.00
Michael McCormack	4.1	\$400.00	\$1,640.00

Melissa Gambardella	1.4	\$125.00	\$175.00
Invoice Subtotal			\$11,565.94
Invoice Total			\$11,565.94

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Please make all amounts payable to: O'Sullivan McCormack Jensen & Bliss PC

Payment is due upon receipt.

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O'Sullivan McCormack Jensen & Bliss<sup>PC</sup>  
Attorneys at Law

180 Glastonbury Boulevard, Suite 210  
Glastonbury, CT 06033  
Phone: 860-258-1993  
www.omjblaw.com

## INVOICE

Invoice No. 28257  
Date: 11/12/2024

Genever Holdings LLC  
c/o Luc Despins, Esq.  
Paul Hastings LLP  
200 Park Avenue  
New York, NY 10166

### 3726-001-Genever Holdings/AIG Property Casualty

#### Services

Date	Attorney	Activity	Time	Rate	Total
10/02/2024	MTM	Review of materials from Attny Linsey re <span>REDACTED</span> telephone conference with. P. Linsey re same	0.70	\$400.00	\$280.00
10/02/2024	MTM	Review and analysis of policy cancellation letter and policy terms re <span>REDACTED</span> <span>REDACTED</span> email correspondence to Attny Linsey re <span>REDACTED</span>	0.40	\$400.00	\$160.00
10/04/2024	MBG	Review, revise and finalize Motion to Hold Remote Hearing.	0.50	\$125.00	\$62.50
10/07/2024	MBG	Attention to Order converting 10/08/2024 hearing to remote and contact clerk for zoom link.	0.10	\$125.00	\$12.50
10/07/2024	TPJ	Communications with counsel re hearing date	0.20	\$450.00	\$90.00
10/08/2024	MTM	Review of motion to stay, opposition and reply brief in preparation for status conference; review motion for summary judgment affidavit of O'Connor re <span>REDACTED</span> (.9); attend status hearing and argument re motion to stay expert discovery and motions re Kwok deposition(1.8)	2.70	\$400.00	\$1,080.00
10/08/2024	MBG	Review recent fee applications and update spreadsheet of fees and expenses to date.	0.30	\$125.00	\$37.50
10/08/2024	TPJ	Communications with MTM re hearing and status	0.20	\$450.00	\$90.00
10/09/2024	MTM	Telephone conference with L. Despins re <span>REDACTED</span> <span>REDACTED</span>	0.30	\$400.00	\$120.00
10/09/2024	MTM	Attention to status conference hearing transcript issues	0.10	\$400.00	\$40.00
10/09/2024	MBG	Draft, revise and finalize Transcript Request for 10/08 hearing in bankruptcy court.	0.30	\$125.00	\$37.50

10/10/2024	MTM	Attention to issues re modified pretrial scheduling order and draft proposed order re granting of motion to stay expert discovery and proposed order re msj and pretrial order, email communications to L. Despina and AIG counsel re same	1.50	\$400.00	\$600.00
10/10/2024	MBG	Telcon with court clerk and email to court reporter to request copy of 10/08/2024 transcript ordered by other counsel.	0.10	\$125.00	\$12.50
10/11/2024	MTM	Telephone conference with J. O'Connor re status conference follow up and depositions; email correspondence to court clerk re proposed order re motion stay	0.30	\$400.00	\$120.00
10/11/2024	MTM	Review of AIG/Wolfson documents re issues <i>REDACTED</i>	0.30	\$400.00	\$120.00
10/13/2024	MTM	Review, revise and supplement interim fee application, email correspondence with Attny Bongartz re same	0.50	\$400.00	\$200.00
10/14/2024	MTM	Review and comment re revised interim fee application; email correspondence with Attny Bongartz re same	0.10	\$400.00	\$40.00
10/16/2024	MBG	Draft September Fee Application and begin redactions of OMJB invoices for same.	0.40	\$125.00	\$50.00
10/17/2024	MTM	Review court orders re modified scheduling order and AIG motion to depose Kwok	0.10	\$400.00	\$40.00
10/17/2024	MBG	Additional redactions to OMJB invoice.	0.10	\$125.00	\$12.50
10/17/2024	TPJ	Review fee application	0.20	\$450.00	\$90.00
10/18/2024	MBG	Finalize OMJB September fee application.	0.20	\$125.00	\$25.00
10/25/2024	TPJ	Communications re Wolfson deposition	0.50	\$450.00	\$225.00
10/29/2024	MTM	Telephone conference with Luc Despina re <i>REDACTED</i>	0.20	\$400.00	\$80.00
10/29/2024	MTM	Review of Wolfson production in preparation of for AIG deposition of Wolfson; review <i>REDACTED</i>	0.80	\$400.00	\$320.00
10/31/2024	MTM	Telephone conference with <i>REDACTED</i> re deposition	0.50	\$400.00	\$200.00
<b>Services Subtotal</b>					<b>\$4,145.00</b>

## Expenses

Type	Date	Activity	Total
Expense	10/01/2024	Fees advanced to Logikcull INV2722378 9/1/2024 - 9/30/2024	\$176.92
Expense	10/31/2024	Copying: Month of October	\$1.80
Expense	10/31/2024	PACER: Month of October	\$0.50
<b>Expenses Subtotal</b>			<b>\$179.22</b>

Time Keeper	Time	Rate	Total
Timothy Jensen	1.1	\$450.00	\$495.00
Michael McCormack	8.5	\$400.00	\$3,400.00

Melissa Gambardella	2.0	\$125.00	\$250.00
Invoice Subtotal			\$4,324.22
Invoice Total			\$4,324.22

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Payment is due upon receipt.

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Glastonbury, CT 06033  
Phone: 860-258-1993  
www.omjblaw.com

## INVOICE

Invoice No. 28257  
Date: 11/12/2024

*REDACTED*



O'SullivanMcCormackJensen & Bliss<sup>PC</sup>  
Attorneys at Law

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Glastonbury, CT 06033  
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## INVOICE

Invoice No. 28372  
Date: 12/11/2024

Genever Holdings LLC  
c/o Luc Despins, Esq.  
Paul Hastings LLP  
200 Park Avenue  
New York, NY 10166

### 3726-001-Genever Holdings/AIG Property Casualty

#### Services

Date	Attorney	Activity	Time	Rate	Total
11/01/2024	MTM	Revise depositionnotice re AIG deposition, draft list of topics re AIG deposition, email correspondence to Attny O'Connor re same	0.90	\$400.00	\$360.00
11/01/2024	MBG	Draft 30b(6) depositionnotice on AIG.	0.40	\$125.00	\$50.00
11/01/2024	TPJ	Attend to deposition topics	0.90	\$450.00	\$405.00
11/02/2024	TPJ	Review corporate witness depositiontopics; communications re same	0.50	\$450.00	\$225.00
11/03/2024	TPJ	Communications re Wolfson deposition	0.20	\$450.00	\$90.00
11/04/2024	MBG	Communications with court reporter re AIG 30b(6) deposition.	0.10	\$125.00	\$12.50
11/04/2024	AM	Email correspondence with J. O'Connor, A. Wolfson, et al. re: Wolfson 30b6 deposition.	0.30	\$350.00	\$105.00
11/06/2024	MTM	Email communications with AIG counsel re motion to modify scheduling order	0.10	\$400.00	\$40.00
11/06/2024	MTM	Review of draft motion to modifyfact discovery deadline; email correspondence with counsel re same	0.10	\$400.00	\$40.00
11/09/2024	MTM	Email communications with T. Garg re status conference transcript	0.10	\$400.00	\$40.00
11/13/2024	MBG	Draft of OMJB Fee Application for October Fees and initial redaction of invoice re same.	0.40	\$125.00	\$50.00
11/14/2024	AM	Review Wolfson documentproduction in preparation for Wolfson deposition.	3.30	\$350.00	\$1,155.00
11/16/2024	MTM	Email communications re AIG deposition	0.20	\$400.00	\$80.00



11/16/2024	TPJ	Communications re Wolfson deposition; review documents for information to use for deposition	0.80	\$450.00	\$360.00
11/17/2024	TPJ	Review and analysis of information for Wolfson depo	0.70	\$450.00	\$315.00
11/18/2024	AM	Prepare for deposition of Wolfson by reviewing documents/potential exhibits and outlining examination.	3.50	\$350.00	\$1,225.00
11/18/2024	MBG	Attention to court order converting hearing to remote proceeding.	0.10	\$125.00	\$12.50
11/18/2024	TPJ	Communications re Wolfson deposition	0.50	\$450.00	\$225.00
11/18/2024	MTM	Telephone conference with <span style="background-color: #f0f0f0;">REDACTED</span> (2.) review of documents re preparation for deposition, email communications re Wolfson deposition (.6)	0.80	\$400.00	\$320.00
11/18/2024	MTM	Email correspondence to L. Despins re <span style="background-color: #f0f0f0;">REDACTED</span> <span style="background-color: #f0f0f0;">REDACTED</span>	0.20	\$400.00	\$80.00
11/19/2024	AM	Attend deposition of Wolfson Insurance.	4.20	\$350.00	\$1,470.00
11/19/2024	MTM	Attend status conference with J. Manning re discovery deadlines; telephone conference with J. O'Connor re depositions and status re potential mediation	0.50	\$400.00	\$200.00
11/19/2024	AM	Continue preparing for deposition of Wolfson Insurance.	2.90	\$350.00	\$1,015.00
11/19/2024	AM	Prepare and send exhibits to court reporter and AIG counsel.	0.20	\$350.00	\$70.00
11/19/2024	TPJ	Review and pull additional documents for use at Wolfson deposition (.8) Review fee application (.3)	1.10	\$450.00	\$495.00
11/19/2024	MBG	Further revisions to October OMJB fee application and redactions to invoice.	0.20	\$125.00	\$25.00
11/19/2024	MTM	Attention to issues re <span style="background-color: #f0f0f0;">REDACTED</span> <span style="background-color: #f0f0f0;">REDACTED</span>	0.50	\$400.00	\$200.00
11/19/2024	MTM	Email correspondence to Attny O'Connor re AIG deposition (.1), email communications with L. Despins re <span style="background-color: #f0f0f0;">REDACTED</span> (2)	0.30	\$400.00	\$120.00
11/20/2024	MTM	Review proposed order re modification of scheduling order; email correspondence to L. Despins re <span style="background-color: #f0f0f0;">REDACTED</span> ; review summary re Wolfson deposition testimony	0.30	\$400.00	\$120.00
11/20/2024	MBG	Finalize and e-file OMJB October Fees Application and transmit to notice parties.	0.30	\$125.00	\$37.50
11/20/2024	AM	Email to L. Despins re: <span style="background-color: #f0f0f0;">REDACTED</span>	1.00	\$350.00	\$350.00
<span style="background-color: #f0f0f0;">REDACTED</span>					
<b>Services Subtotal</b>					<b>\$9,292.50</b>

**Expenses**

Type	Date	Activity	Total
Expense	11/04/2024	Fees advanced to Logikcull INV273921 10/1/2024 - 10/31/2024	\$164.28
Expense	11/30/2024	Copying: Month of November	\$43.20

**Expenses Subtotal \$207.48**

Time Keeper	Time	Rate	Total
Timothy Jensen	4.7	\$450.00	\$2,115.00
Amy Markim	15.4	\$350.00	\$5,390.00
Michael McCormack	4.0	\$400.00	\$1,600.00
Melissa Gambardella	1.5	\$125.00	\$187.50
Administrator OMJB	1.0	\$0.00	\$0.00

**Invoice Subtotal \$9,499.98**

**Invoice Total \$9,499.98**

**Payment (12/11/2024) -\$4.32**

**Balance Owing \$9,495.66**

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O'Sullivan McCormack Jensen & Bliss<sup>PC</sup>  
Attorneys at Law

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## INVOICE

Invoice No. 28454  
Date: 01/13/2025

Genever Holdings LLC  
c/o Luc Despins, Esq.  
Paul Hastings LLP  
200 Park Avenue  
New York, NY 10166

### 3726-001-Genever Holdings/AIG Property Casualty

#### Services

Date	Attorney	Activity	Time	Rate	Total
12/04/2024	MTM	Email correspondence from Attny O'Connor re AIG deposition issues	0.10	\$400.00	\$40.00
12/04/2024	AM	Review supplemental submission by AIG and email from opposing counsel re: extending depositions/mediation.	0.30	\$350.00	\$105.00
12/04/2024	MBG	Draft Re-NOD of AIG 30(b)(6) deposition and finalize same with Schedule A.	0.20	\$125.00	\$25.00
12/05/2024	AM	Confer with M. McCormack and T. Jensen re: strategy re: deposition, summary judgment, and mediation.	0.50	\$350.00	\$175.00
12/05/2024	MTM	Review and analysis of AIG supplemental memorandum in opposition to motion for summary judgment (.4), analysis re REDACTED REDACTED (.5), review of Wolfson deposition transcript re AIG MSJ opposition issues (1.4)	2.30	\$400.00	\$920.00
12/05/2024	MTM	Draft email to L. Despins re REDACTED REDACTED	0.30	\$400.00	\$120.00
12/05/2024	TPJ	Communications re MSJ strategy and discovery	0.50	\$450.00	\$225.00
12/06/2024	MTM	Email communications with Attny O'Connor re AIG deposition issues	0.10	\$400.00	\$40.00
12/12/2024	AM	Legal research to respond to supplemental materials/brief of AIG.	5.00	\$350.00	\$1,750.00
12/12/2024	MTM	Review of MSJ cases re REDACTED from Attny Barron; attention to reply brief issues re AIG supplemental opposition	0.20	\$400.00	\$80.00
12/12/2024	MBG	Begin draft of November OMJB Fee Application and redaction of invoice.	0.50	\$125.00	\$62.50

12/13/2024	AM	Continue drafting response to supplemental submission of AIG re: summary judgment.	5.10	\$350.00	\$1,785.00
12/13/2024	MTM	Analysis and strategy re reply to AIG supplement opposition	0.30	\$400.00	\$120.00
12/16/2024	MTM	Review and revise draft of reply re AIG supplemental summary judgment submission; email communications with L. Despina re REDA...	1.00	\$400.00	\$400.00
12/16/2024	MTM	Telephone conference with Attny O'Connor re possible mediation issues	0.20	\$400.00	\$80.00
12/16/2024	AM	Revise/supplement response to AIG summary judgment supplement.	1.60	\$350.00	\$560.00
12/16/2024	TPJ	Review draft reply and comments re same	1.00	\$450.00	\$450.00
12/17/2024	AM	Revise/supplement response to AIG's supplemental MSJ submission.	3.00	\$350.00	\$1,050.00
12/17/2024	MTM	Revise and supplement reply brief to AIG supplemental submission and review and analysis of cases re REDACTED review AIG brief in opposition to motion for summary judgment	3.30	\$400.00	\$1,320.00
12/17/2024	MTM	Revise and supplement declaration and supporting documents re reply to AIG opposition (.8); email communications and telephone conference with Attny Despina re REDACTED (.4)	1.20	\$400.00	\$480.00
12/17/2024	MTM	Review and analysis of cases re summary judgment and declarations re REDACTED (.8); review of REDACTED (.5)	1.30	\$400.00	\$520.00
12/17/2024	MBG	Review and revise Response to AIG Supplemental Materials memorandum and draft MTM Declaration including preparation of attached exhibits.	2.80	\$125.00	\$350.00
12/20/2024	MTM	Review, revise and supplement interim fee application and supporting documents	0.30	\$400.00	\$120.00
12/20/2024	MBG	Revise and finalize OMJB November Fees Application and further redaction of invoice attachment.	0.40	\$125.00	\$50.00
12/20/2024	TPJ	Review fee application	0.20	\$450.00	\$90.00
Services Subtotal					\$10,917.50

## Expenses

Type	Date	Activity	Total
Expense	12/03/2024	Fees advanced to Logikcull INV275607 11/1-2024-11/30/2024	\$176.92
Expense	12/23/2024	Fees advanced to Veritext LLC invoice 7893246 11-22-2024 re Adam Wolfson transcript	\$1,192.25
Expense	12/31/2024	Copying: Month of December	\$12.20
Expense	12/31/2024	Westlaw: Month of December	\$217.65
Expenses Subtotal			\$1,599.02

Time Keeper	Time	Rate	Total
Timothy Jensen	1.7	\$450.00	\$765.00

Amy Markim	15.5	\$350.00	\$5,425.00
Michael McCormack	10.6	\$400.00	\$4,240.00
Melissa Gambardella	3.9	\$125.00	\$487.50
Invoice Subtotal			\$12,516.52
Invoice Total			\$12,516.52

REDACTED

Please make all amounts payable to: O'Sullivan McCormack Jensen & Bliss PC      Tax ID# REDACTED

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