

McDONALD CARANO LLP
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ALLEN OVERY SHEARMAN STERLING US LLP
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Counsel to the Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

- ☒ NEVADA COPPER, INC.
- ☒ NEVADA COPPER CORP.
- ☒ NC DITCH COMPANY LLC
- ☒ NC FARMS LLC
- ☒ LION IRON CORP.
- ☒ 0607792 B.C. LTD.

Debtors.¹

Lead Case No.: 24-50566-hlb
Chapter 11

Jointly Administered with:
Case No.: 24-50567-hlb
Case No.: 24-50568-hlb
Case No.: 24-50569-hlb
Case No.: 24-50570-hlb
Case No.: 24-50571-hlb

**NINTH INTERIM MONTHLY FEE STATEMENT OF
MCDONALD CARANO LLP FOR ALLOWANCE AND PAYMENT OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF
MARCH 1, 2025, THROUGH MARCH 31, 2025**

¹ The Debtors in these chapter 11 cases and the last four digits of their registration numbers in the jurisdiction in which they are organized are: Nevada Copper, Inc. (1157) (Nevada); Nevada Copper Corp. (5323) (British Columbia); 0607792 B.C. Ltd. (2524) (British Columbia); Lion Iron Corp. (2904) (Nevada); NC Farms LLC (0264) (Nevada); and NC Ditch Company LLC (4396) (Nevada).

Name of Applicant:	McDonald Carano LLP
Authorized to Provide Services to:	Nevada Copper, Inc., <i>et al.</i>
Date of Retention:	Order entered on August 5, 2024, authorizing retention as of June 10, 2024 [ECF No. 494].
Period for which Compensation and Expenses are Sought:	March 1, 2025, through March 31, 2025.
Total Fees Incurred in Period:	\$14,937.50
20% Holdback:	-\$2,987.50
Compensation Net of Holdback:	\$11,950.00
Amount of Expenses Requested:	\$167.60
Total Compensation and Expenses (Net of Holdback):	\$12,117.60
Objection Deadline:	May 14, 2025

McDonald Carano LLP (“McDonald Carano” or the “Applicant”), co-counsel for the Debtors Nevada Copper, Inc., Nevada Copper Corp., NC Ditch Company LLC, NC Farms LLC, Lion Iron Corp., and 0607792 B.C. Ltd. (“**Debtors**”), hereby submits its interim monthly fee statement (the “**Interim Fee Statement**”) for allowance and payment of compensation for professional services rendered and for reimbursement of actual and necessary expenses incurred for the period commencing March 1, 2025, through March 31, 2025 (the “**Interim Fee Period**”) pursuant to the *Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [ECF No. 501] (the “**Interim Compensation Procedures Order**”).

By this Interim Fee Statement, McDonald Carano requests allowance and payment of \$11,950.00 (representing 80% of the \$14,937.50 in fees incurred) as compensation for professional services rendered to the Debtors and allowance and payment of \$167.60 (representing 100% of expenses incurred) as reimbursement for actual and necessary expenses incurred by McDonald Carano during the Interim Fee Period.

Attached hereto as **Exhibit 1** is the name of each professional at McDonald Carano who performed services for the Debtors in connection with these Chapter 11 Cases during the Interim Fee Period and the hourly rate and total fees for each professional. Attached hereto as **Exhibit 2** is a summary of hours during the Interim Fee Period by task. Attached hereto as **Exhibit 3** are detailed

time entries and expenses for the Interim Fee Period (invoice for the period March 1, 2025, through March 31, 2025) redacted only to protect work product and/or privilege.

Some fees and expenses may not be included in this Statement due to delays in the accounting and processing of certain fees and expenses during the Interim Fee Period. McDonald Carano reserves all rights to seek further allowance of such fees and expenses not set forth herein.

In accordance with the Interim Compensation Procedures Order, objections to this Interim Fee Statement, if any, must be served within 20 days of receipt of the Interim Fee Statement. At the expiration of this 20-day review period, the Debtors will promptly pay 80% of the fees and all the disbursements requested in this Interim Fee Statement, except such fees or disbursements as to which an objection has been served.

Dated this 24th day of April 2025.

McDONALD CARANO LLP

/s/ Ryan J. Works

Ryan J. Works (NSBN 9224)

Amanda M. Perach (NSBN 12399)

2300 West Sahara Avenue, Suite 1200

Las Vegas, Nevada 89102

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ALLEN OVERY SHEARMAN STERLING US LLP

Fredric Sosnick (NYSBN 2472488) (*admitted pro hac vice*)

Sara Coelho (NYSBN 4530267) (*admitted pro hac vice*)

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New York, New York 10022

fsosnick@aoshearman.com

sara.coelho@aoshearman.com

Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT 1**Fee Summary for March 1, 2025, through March 31, 2025****COMPENSATION BY PROFESSIONAL FOR FEE PERIOD**

<u>Name</u>	<u>Position</u>	<u>Admission Year</u>	<u>Rate</u>	<u>Hours Billed</u>	<u>Total Compensation</u>
Works, Ryan	Partner	2004	\$650.00	14.30	\$9,295.00
Perach, Amanda	Partner	2011	\$550.00	0.80	\$440.00
Dahu, Jimmy	Of Counsel	2006 (Texas) 2011 (Arizona)	\$550.00	5.00	\$2,750.00
Whittaker, Michael	Partner	2015 (Nevada) 2011 (Idaho)	\$475.00	0.30	\$142.50
Grubb, Brian	Paralegal		\$300.00	7.70	\$2,310.00
Total				28.10	\$14,937.50

EXHIBIT 2**Fee Summary by Project Category for March 1, 2025, through March 31, 2025****COMPENSATION BY MATTER**

<u>Matter Description</u>	<u>Hours Billed</u>	<u>Total Compensation</u>
Case Administration (B110)	10.30	\$4,230.00
Fee/Employment Applications (B160)	0.80	\$240.00
Assumption/Rejection of Leases/Contracts (B185)	3.70	\$2,405.00
Business Operation (B210)	1.30	\$692.52
Claims Administration and Objections (B310)	11.80	\$7,240.00
Plan and Disclosure Statement (B320)	0.20	\$130.00
Total =	28.10	\$14,937.52

EXHIBIT 3

**McDonald Carano LLP invoice, including detailed fee entries and summary of expenses,
for March 1, 2025, through March 31, 2025**



FEDERAL TAX ID 88-0074283

Nevada Copper Inc.
Gregory J. Martin, CEO
61 E. Pursel Lane
P.O. Box 1640
Yerington, NV 89447

Invoice No. 12502335
April 16, 2025

FOR PROFESSIONAL SERVICES RENDERED through March 31, 2025:

Re: Client.Matter: 19642 - 13
CHAPTER 11 BANKRUPTCY COUNSEL
EMAIL INVOICES

ACCOUNT SUMMARY

Balance Forward as of Previous Invoice	\$ 87,623.82
Payments	-40,505.20
Adjustments	.00
Balance Outstanding	\$ 47,118.62

CURRENT INVOICE

Total Professional Services	\$ 14,937.50
Total Expenses	\$ 167.60
Total This Invoice	\$ 15,105.10

TOTAL BALANCE NOW DUE **\$ 62,223.72**

Trust Balance	\$ 19,389.80
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mcdonaldcarano.com

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100 West Liberty Street, Tenth Floor • Reno, Nevada 89501 • 775.788.2000

Mailing Address: P.O. Box 2670 • Reno, Nevada 89505





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McDONALD CARANO LLP

Invoice No. 12502335

April 16, 2025

Re: Client.Matter: 19642 - 13
CHAPTER 11 BANKRUPTCY COUNSEL
EMAIL INVOICES

PROFESSIONAL SERVICES

Date	Atty	Task	Actv	Description of Services	Hours	Amount
3/05/25	JFD	B210		Meet with Ryan Works re renewal of non-operational entities with the Nevada Secretary of State	.20	110.00
3/05/25	JFD	B210		Commence research re renewal of non-operational corporations with the Nevada Secretary of State and potential effect on liquidating plan	.20	110.00
3/05/25	JFD	B210		Meet with Michael Whittaker re renewal of non-operational entities with the Nevada Secretary of State	.20	110.00
3/05/25	JFD	B210		Send email to Ryan Works and Michael Whittaker re renewal of non-operational entities with the Nevada Secretary of State	.10	55.00
3/05/25	MGW	B210		Discussions with Jimmy Dahu re effect of non-compliance with business license and reporting compliance	.30	142.50
3/06/25	JFD	B210		Exchange emails with Michael Whittaker and Melissa Payette re renewal of non-operational entities with the Nevada Secretary of State	.20	110.00
3/07/25	JFD	B210		Exchange emails with Melissa Payette re renewal of non-operational entities with the Nevada Secretary of State	.10	55.00
3/08/25	RJW	B310		Exchange emails with Greg Martin to obtain fully-executed settlement agreement with Lyon County in light of board approval from Lyon County Commissioners	.20	130.00
3/10/25	RJW	B310		Prepare supplement to file with fully-executed settlement agreement attached	.20	130.00
3/10/25	RJW	B310		Emails with John Lewis, Esq. representing	.10	65.00

McDONALD CARANO LLP

Invoice No. 12502335

April 16, 2025

Date	Atty	Task	Actv	Description of Services	Hours	Amount
3/10/25	RJW	B185		Southern Tire Mart re resolution of dispute Follow-up emails with Jeremy Duke re status and update on final resolution and documents re assumption and assignment of NV Energy agreements (and settlement agreement) with SCM and Trisura	.20	130.00
3/10/25	RJW	B110		Receive, review and provide comments and changes to proposed agenda for this week's hearings	.50	325.00
3/10/25	RJW	B110		Prepare for and attend all-hands conference call with A&O Shearman team re various open matters and strategy going forward this week at omnibus hearing	.70	455.00
3/11/25	RJW	B310		Work on perfecting the docket to reflect various resolutions, withdrawals and stipulations re claims objections	1.00	650.00
3/11/25	RJW	B110		Make further changes to agenda for hearings on March 13, 2025 and cause to file and serve same	.50	325.00
3/11/25	BAG	B110		Exchange emails with Ryan Works and client re motion to seal MF related filings (.1); Revise same (.2)	.30	90.00
3/12/25	RJW	B310		Work on resolving issues with claim objections with Bankruptcy Court as well as A&O Shearman Team in advance of hearings on same tomorrow (no charge 2.5 for a total of 5 hours worked on this task)	2.50	1,625.00
3/12/25	BAG	B160		Draft and file certificates of no objection re Alixpartners and A&O's seventh fee statements	.50	150.00
3/13/25	RJW	B310		Prepare for and attend hearings on omnibus claim objections, settlement motion under 9019 and other matters (1.2); continue working on proposed orders with clerk's office and court (.7); prepare and submit proposed order on 9019 approval of Lyon County settlement agreement and general mutual release and	2.70	1,755.00

McDONALD CARANO LLP

Invoice No. 12502335

April 16, 2025

Date	Atty	Task	Actv	Description of Services	Hours	Amount
3/13/25	BAG	B110		circulate to Illyssa Fogel (.8)		
3/13/25	BAG	B110		Review orders and motions to be filed (.4);	.80	240.00
3/14/25	JFD	B310		Exchange emails with team re same (.4)		
3/14/25	JFD	B310		Exchange emails with Chris Newcomb re	.10	55.00
3/14/25	JFD	B310		draft complaint asserting causes of action		
3/14/25	JFD	B310		and objecting to proof of claim of Concord		
3/14/25	JFD	B310		Resources Limited		
3/14/25	JFD	B310		Review draft complaint asserting causes of	.40	220.00
3/14/25	JFD	B310		action and objecting to proof of claim of		
3/14/25	JFD	B310		Concord Resources Limited and ensure		
3/14/25	JFD	B310		compliance with local rules		
3/14/25	RJW	B185		Prepare for and attend all-hands meeting	.50	325.00
3/14/25	RJW	B185		to complete settlement agreement as		
3/14/25	RJW	B185		between Debtor, SCM and NV Energy and		
3/14/25	RJW	B185		provide redlines to group to finalize same		
3/14/25	BAG	B110		Review, revise, and finalize order granting	4.00	1,200.00
3/14/25	BAG	B110		second stipulation re cash collateral (.4);		
3/14/25	BAG	B110		Review, revise, and finalize order granting		
3/14/25	BAG	B110		motion to approve settlement agreement		
3/14/25	BAG	B110		(.3); Review, revise, and finalize order re		
3/14/25	BAG	B110		second omnibus objection for equity		
3/14/25	BAG	B110		claims (.4); Review, revise, and finalize		
3/14/25	BAG	B110		motion to seal objection to MF Claim,		
3/14/25	BAG	B110		including its proposed order (.7); Review,		
3/14/25	BAG	B110		revise, and finalize notice of hearing for		
3/14/25	BAG	B110		April 17, 2025 morning hearings (.5);		
3/14/25	BAG	B110		Exchange emails with Team re same (.6);		
3/14/25	BAG	B110		Confer with Ryan Works re same (.2); File		
3/14/25	BAG	B110		or upload all above (.5); Review, revise,		
3/14/25	BAG	B110		finalize and file order sustaining debtors'		
3/14/25	BAG	B110		objection to spectrum's no liability claim		
3/14/25	BAG	B110		(.4)		
3/17/25	AMP	B310		Exchange emails with Chris Newcomb re	.20	110.00
3/17/25	AMP	B310		service via Hague Convention and related		
3/17/25	AMP	B310		issues with respect to NC Concord		
3/17/25	AMP	B310		complaint		
3/17/25	AMP	B310		Exchange emails with lead counsel re	.20	110.00
3/17/25	AMP	B310		Changrun Lu's response to objection to		
3/17/25	AMP	B310		claim		

McDONALD CARANO LLP

Invoice No. 12502335

April 16, 2025

Date	Atty	Task	Actv	Description of Services	Hours	Amount
3/17/25	JFD	B310		Review emails re foreign service of summons and adversary complaint objecting to proof of claim 10102	.20	110.00
3/17/25	JFD	B310		Exchange emails with Brian Grubb, Amanda Perach, and Ryan Works re responses sent by pro per claimants to Debtors' Second (Non-Substantive) Omnibus Objection to Claims Asserting Equity Interests	.20	110.00
3/17/25	RJW	B110		Attention to various open matters, orders to upload and filings to complete to perfect docket	.50	325.00
3/17/25	BAG	B110		Work on multiple filings requested by lead counsel with Kimberly Kirn	.40	120.00
3/18/25	AMP	B310		Exchange emails with Jimmy Dahu and Sara Coelho re notice of response to objection to equity claims (.2); revise same (.2)	.40	220.00
3/18/25	JFD	B310		Commence drafting Notice of Debtors' Receipt of Pro Per Objections to Debtors' Second (Non-Substantive) Omnibus Objection to Claims Asserting Equity Interests [ECF No. 1219]	.70	385.00
3/18/25	JFD	B310		Review draft adversary complaint objecting to Proof of Claim 10102	.40	220.00
3/18/25	JFD	B310		Review and analyze local and federal rules regarding adversary complaints objecting to proofs of claim re complaint objecting to proof of claim 10102	.40	220.00
3/19/25	JFD	B110		Review email from Chris Newcomb re service of summons and extension of deadline to serve same re complaint objecting to proof of claim 10102	.20	110.00
3/19/25	JFD	B310		Exchange emails with Kimberly Kirn re filing of Notice of Debtors' Receipt of Pro Per Objections to Debtors' Second (Non-Substantive) Omnibus Objection to Claims Asserting Equity Interests	.10	55.00
3/20/25	JFD	B310		Review draft of motion to seal re	.40	220.00

McDONALD CARANO LLP

Invoice No. 12502335

April 16, 2025

Date	Atty	Task	Actv	Description of Services	Hours	Amount
				complaint objecting to proof of claim 10102		
3/20/25	JFD	B310		Review complaint objecting to proof of claim 10102	.40	220.00
3/20/25	JFD	B310		Exchange emails with Chris Newcomb re motion to seal and complaint objecting to proof of claim 10102	.10	55.00
3/21/25	BAG	B110		Exchange emails with team re LEDES data file(s) in support of McDonald Carano's second fee application (.2); Work with accounting re same (.1); Send email to Jared Day/U.S. Trustee enclosing same (.1)	.40	120.00
3/21/25	BAG	B110		Review and respond to email from Alpesh Surati re monthly operating reports (.1); Finalize all six monthly operating reports and prepare to be filed (.5); File same (.4)	1.00	300.00
3/21/25	BAG	B160		Draft and file certificate of no objection re McDonald Carano's seventh fee statement	.30	90.00
3/22/25	RJW	B110		Receive and review dozens of emails from last week re case administration	.50	325.00
3/24/25	RJW	B110		Attend weekly conference call with A&O Shearman Team re status and update on several open items	.20	130.00
3/24/25	RJW	B310		Review objections of pro-per shareholders and devise strategy to notify bankruptcy court of same	.40	260.00
3/25/25	RJW	B185		Prepare for and attend Teams meeting with F. Sosnick, G. Martin et al. to discuss Design Contract with NV Energy and follow-up emails to NV Energy and SCM re same	.50	325.00
3/25/25	RJW	B185		Emails throughout day re Design Contract with Nevada Energy and issues with same	.40	260.00
3/25/25	RJW	B310		Call with Shawen Michael re equity claim and issues with same	.20	130.00
3/25/25	JFD	B110		Teleconference with Ryan Works, Greg Martin, and Alpesh Surati re Nevada Energy contract	.30	165.00
3/26/25	RJW	B185		Emails with Austin Jensen (SCM) and	.50	325.00

McDONALD CARANO LLP

Invoice No. 12502335

April 16, 2025

Date	Atty	Task	Actv	Description of Services	Hours	Amount
				Jeremy Duke (NVE) re final changes to assignments of NVE contracts and settlement agreement and request for update on timing of signatures		
3/26/25	RJW	B310		Review and make changes to cover sheet to file shareholders' objection to plan and confirmation	.20	130.00
3/27/25	RJW	B320		Call with Chris Newcomb re status and update on solicitation, plan and exclusivity issues	.20	130.00
3/28/25	RJW	B185		Emails with Austin Jensen, Greg Martin and Fred Sosnick re status and update on NV Energy assignment documents and follow-up calls with Jeremy Duke re same	.80	520.00
3/31/25	RJW	B185		Several emails with Jeremy Duke on behalf of NV Energy, Austin Jensen on behalf of SCM, Greg Martin and A&O Shearman team re settlement, assumption, assignment agreements and finalizing same for execution	.80	520.00
3/31/25	JFD	B310		Exchange emails with Chris Newcomb re draft adversary complaint asserting a claim objection	.10	55.00
Current Professional Services						\$ 14,937.50

SUMMARY OF PROFESSIONAL SERVICES

Timekeeper	Title	Rate	Hours	Amount	N/C \$
Brian Grubb	Paralegal	300.00	7.70	2,310.00	.00
Michael Whittaker	Partner	475.00	.30	142.50	.00
Amanda Perach	Partner	550.00	.80	440.00	.00
Jimmy Dahu	Of Counsel	550.00	5.00	2,750.00	.00
Ryan J. Works	Partner	650.00	14.30	9,295.00	.00
Total			28.10	\$ 14,937.50	\$.00

McDONALD CARANO LLP

Invoice No. 12502335

April 16, 2025

EXPENSES

Description		Amount
3/10/25	Transcripts, Bankcard Center- Refund for Transcripts	-36.50
	Copying	27.50
3/18/25	Mileage, Ryan Imsdahl	1.40
3/25/25	Transcripts, Bankcard Center	175.20
Current Expenses		\$ 167.60

TOTAL THIS INVOICE \$ 15,105.10

McDONALD CARANO LLP

Invoice No. 12502335

April 16, 2025

INVOICES OUTSTANDING

INVOICE NUMBER	DATE	INVOICE TOTAL	PAYMENTS RECEIVED	ENDING BALANCE
12490979	11/14/24	34,514.66	27,899.66	6,615.00
12492448	12/20/24	17,349.38	14,091.88	3,257.50
12497886	1/17/25	11,503.80	9,295.80	2,208.00
12499293	2/20/25	50,452.20	40,505.20	9,947.00
12500840	3/24/25	25,091.12	.00	25,091.12

Outstanding Balance \$ 47,118.62

Current Invoice \$ 15,105.10

TOTAL BALANCE DUE **\$ 62,223.72**



FEDERAL TAX ID 88-0074283

REMITTANCE PAGE

Nevada Copper Inc.
 Gregory J. Martin, CEO
 61 E. Pursel Lane
 P.O. Box 1640
 Yerington, NV 89447

Invoice No. 12502335
 April 16, 2025

FOR PROFESSIONAL SERVICES RENDERED through March 31, 2025:

Re: Client.Matter: 19642 - 13
CHAPTER 11 BANKRUPTCY COUNSEL

Balance Due This Invoice	\$ 15,105.10
Balance Outstanding	<u>\$ 47,118.62</u>
TOTAL BALANCE DUE	<u>\$ 62,223.72</u>

To Ensure Proper Credit Refer to Matter No. 19642 - 13

All Checks should be made payable to:
 Please return this page with payment

McDonald Carano LLP
 P.O. Box 2670 ; Reno, Nevada 89505

For payment by wire or ACH:
 Please email wire confirmation to
 accounting@mcdonaldcarano.com

Nevada State Bank
 1 West Liberty Street
 Reno, Nevada 89501
 McDonald Carano LLP
 Account No. 0542004190
 Routing No. 122400779
 Swift Code No. ZFNBUS55

To pay online via credit/debit card please visit: www.mcdonaldcarano.com/online-payments/

To read our current Privacy Policy, please visit: www.mcdonaldcarano.com/privacy

PAYMENT IS DUE UPON RECEIPT

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