

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re	:	Chapter 11
	:	
AIG FINANCIAL PRODUCTS CORP., ¹	:	Case No. 22-11309 (MFW)
	:	
Debtor.	:	
	:	Ref. Docket No. 773
	X	

**SUPPLEMENT TO ELEVENTH INTERIM FEE
APPLICATION OF LATHAM & WATKINS LLP**

Latham & Watkins LLP (“**L&W**”), co-counsel to the above-captioned debtor and debtor in possession (the “**Debtor**”), hereby files this supplement to the *Eleventh Interim Fee Application of Latham & Watkins LLP* [Docket No. 773] (the “**Eleventh Interim Application**”) and attaches hereto: (a) as **Exhibit A**, L&W’s summary cover sheet related to the Eleventh Interim Application, (b) as **Exhibit B**, a summary of compensation by each professional of L&W that worked on the above-captioned chapter 11 case, (c) as **Exhibit C**, a summary of compensation by project category, (d) as **Exhibit D**, an expense summary, (e) as **Exhibit E**, L&W’s customary and comparable compensation disclosures, (f) as **Exhibit F**, the *Budget for Latham & Watkins LLP, Bankruptcy Co-Counsel to the Debtor, for the Period from October 1, 2025 through December 31, 2025* and the *Staffing Plan for Latham & Watkins LLP, Bankruptcy Co-Counsel to the Debtor, for the Period from October 1, 2025 through December 31, 2025*, (g) as **Exhibit G**, a summary of fees and hours budgeted compared to fees and hours billed, and (h) as **Exhibit H**, a certification of Keith A. Simon in support of the Eleventh Interim Application.

¹ The Debtor in this case, along with the last four digits of the Debtor’s federal tax identification number, is: AIG Financial Products Corp. (9410). The Debtor’s address is 50 Danbury Road, Wilton, Connecticut 06897.

Dated: February 26, 2026
Wilmington, Delaware

Respectfully Submitted,

/s/ Kara Hammond Coyle

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Michael R. Nestor (No. 3526)
Kara Hammond Coyle (No. 4410)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Emails: mnestor@ycst.com
kcoyle@ycst.com

-and-

George A. Davis (admitted *pro hac vice*)
Keith A. Simon (admitted *pro hac vice*)
Annemarie V. Reilly (admitted *pro hac vice*)
Madeleine C. Parish (admitted *pro hac vice*)

LATHAM & WATKINS LLP

1271 Avenue of the Americas
New York, New York 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
Email: george.davis@lw.com
keith.simon@lw.com
annemarie.reilly@lw.com
madeleine.parish@lw.com

Co-Counsel for Debtor and Debtor in Possession

Exhibit A**Summary Cover Sheet of Eleventh Interim Fee Application**

Case Name: **AIG Financial Products Corp.**
Case Number: **22-11309 (MFW)**
Applicant's Name: **Latham & Watkins LLP**
Date of Application: **February 26, 2026**
Interim or Final: **Interim**

Name of Applicant	Latham & Watkins LLP
Name of Client	AIG Financial Products Corp.
Time Period Covered by the Eleventh Interim Fee Period	Start: October 1, 2025 End: December 31, 2025
Total compensation sought for the Eleventh Interim Fee Period	\$79,807.50
Total expenses sought for the Eleventh Interim Fee Period	\$6,408.35
Petition date	December 14, 2022
Retention date	December 14, 2022
Date of order approving employment	January 30, 2023 [Docket No. 124]
Total allowed compensation paid to date	\$27,217,051.31
Total allowed expenses paid to date	\$617,283.84
Blended rate in the Eleventh Interim Fee Period for all attorneys	\$1,925.85
Blended rate in the Eleventh Interim Fee Period for all timekeepers	\$1,731.18
Compensation sought and already paid pursuant to a monthly fee application but not yet allowed	\$0.00
Expenses sought and already paid pursuant to a monthly fee application but not yet allowed	\$0.00
Number of professionals included in this Application	8
If applicable, number of professionals included in this Application but not included in staffing plan approved by client	0 ¹
Difference between fees budgeted and compensation sought for the Eleventh Interim Fee Period	Fees sought are \$595,942.50 less

¹ The Budget and Staffing Plan approved by the client includes only the timekeepers expected to bill at least 15 hours to the Chapter 11 Case during the Eleventh Interim Fee Period. Of the 8 timekeepers included in this Application, none billed 15 hours or more.

Number of professionals billing fewer than 15 hours to the case during the Eleventh Interim Fee Period	8
Are any rates higher than those approved or disclosed at retention?	Yes ²

² The billable rates for Latham attorneys are adjusted on January 1 of each year. Notice of Latham's rate increase effective as of January 1, 2025 was filed on December 30, 2024 [Docket No. 532].

Exhibit B**Compensation by Professional**

Name of Professional	Position; Date of Hire; Year of Obtaining License to Practice	Hourly Billing Rate¹	Total Hours Billed	Total Compensation
Simon, Keith A.	Partner. Joined firm in 2004. Member of Illinois Bar since 1999. Member of New York Bar since 2008.	\$2,325.00	12.40	\$28,830.00
Wine, Jamie L.	Partner. Joined firm in 1995. Member of California Bar since 1996. Member of District of Columbia Bar since 2007. Member of New York Bar since 2007. Member of Vermont Bar since 2020.	\$2,070.00	3.10	\$6,417.00
Gardiner, Drew T.	Partner. Joined firm in 2004. Member of California Bar since 2004.	\$1,680.00	0.90	\$1,512.00
Marks, Elizabeth R.	Partner. Joined firm in 2006. Member of California Bar since 2006. Member of Massachusetts Bar since 2020. New York 2010.	\$1,680.00	2.70	\$4,536.00
Reilly, Annemarie V.	Counsel. Joined firm in 2009. Member of New York Bar since 2010.	\$1,775.00	13.40	\$23,785.00
Parish, Madeleine C.	Associate. Joined firm in 2019. Member of New York Bar since 2019.	\$1,565.00	6.90	\$10,798.50
Tarrant, Christopher M.	Senior Paralegal. Joined firm in 2022.	\$595.00	6.20	\$3,689.00
Jaman, Ella M.	Paralegal. Joined firm in 2022.	\$480.00	0.50	\$240.00

Grand Total **\$79,807.50**
Total Hours **46.10**
Blended Rate **\$1,731.18**

¹ The billable rates for L&W attorneys are adjusted on January 1 of each year. Notice of L&W's rate increase effective as of January 1, 2025 was filed on December 30, 2024 [Docket No. 532].

Exhibit C**Compensation by Project Category**

Project Category	Total Hours	Total Fees
Business Operations	0.90	\$1,512.00
Case Administration	0.40	\$626.00
Claims Administration and Objections	0.50	\$782.50
Corporate Governance and Board Matters	8.90	\$16,353.50
Employment and Fee Applications	10.30	\$9,857.00
Litigation – Deferred Compensation Plan	14.80	\$32,394.00
Plan and Disclosure Statement	10.30	\$18,282.50
Total	46.10	\$79,807.50

Exhibit D**Expense Summary**

Expense Category	Total Expenses
Court Research	\$364.10
Outside Services - Non-Attorney (Witness Travel)	\$1,121.35
Transcripts	\$2,987.00
Westlaw	\$1,935.90
Total	\$6,408.35

Exhibit E**Customary and Comparable Compensation Disclosures**

Category of Timekeeper	Blended Hourly Rate	
	Billed Firm-Wide for Preceding Year (2024) ¹	Billed October 1, 2025 through December 31, 2025
Partner	\$1,809	\$2,162
Counsel	\$1,522	\$1,775
Senior Associate (7 years or more since first admission)	\$1,393	\$1,565
Mid-Level Associate (4-6 years since first admission)	\$1,273	N/A
Junior Associate (0-3 years since first admission)	\$961	N/A
Professional Staff	\$547	N/A
Paraprofessionals	\$533	\$586
All Timekeepers Aggregated	\$1,329	\$1,731

¹ The data in this column excludes 2024 blended hourly rate information for members of the Restructuring and Special Situations practice group. The billable rates for Latham attorneys are adjusted on January 1 of each year.

Exhibit F

Budget & Staffing Plan

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

----- X
 :
 In re: : Chapter 11
 :
 AIG FINANCIAL PRODUCTS CORP.,¹ : Case No. 22-11309 (MFW)
 :
 Debtor. :
 :
 ----- X

**BUDGET FOR LATHAM & WATKINS LLP, BANKRUPTCY
CO-COUNSEL TO THE DEBTOR, FOR THE PERIOD
FROM OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025**

Date Retention Approved: January 30, 2023, *nunc pro tunc* to December 14, 2022

Date Budget Approved by Client: September 3, 2025

PROJECT CATEGORY	ESTIMATED HOURS	ESTIMATED FEES ²
Asset Disposition	10	\$12,750.00
Assumption and Rejection of Leases and Contracts	10	\$12,750.00
Avoidance Action Analysis	10	\$12,750.00
Business Operations	40	\$51,000.00
Case Administration	50	\$63,750.00
Claims Administration and Objections	50	\$63,750.00
Corporate Governance and Board Matters	50	\$63,750.00
Employment and Fee Applications	20	\$25,500.00
Employment and Fee Application Objections	10	\$12,750.00
Hearings	25	\$31,875.00

¹ The Debtor in this case, along with the last four digits of the Debtor’s federal tax identification number, is: AIG Financial Products Corp. (9410). The Debtor’s address is 50 Danbury Road, Wilton, Connecticut 06897.

² The estimated fees for each project category were calculated by multiplying the estimated number of hours by \$1,275, which is consistent with the average hourly rate for the L&W attorneys expected to work on the matter during the budget period as set forth in the accompanying staffing plan.

PROJECT CATEGORY	ESTIMATED HOURS	ESTIMATED FEES²
Litigation ³	75	\$95,625.00
Non-Working Travel	25	\$31,875.00
Meetings and Communications with Creditors	25	\$31,875.00
Plan and Disclosure Statement	100	\$127,500.00
Relief from Stay and Adequate Protection	10	\$12,750.00
Reporting	10	\$12,750.00
Tax	10	\$12,750.00
TOTAL	530	\$675,750.00

³ This category reflects all estimated hours and fees relating to litigation-related work, including with respect to the Deferred Compensation Plan.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

-----	x	
	:	
In re:	:	Chapter 11
	:	
AIG FINANCIAL PRODUCTS CORP., ¹	:	Case No. 22-11309 (MFW)
	:	
Debtor.	:	
	:	
-----	x	

**STAFFING PLAN FOR LATHAM & WATKINS LLP, BANKRUPTCY
CO-COUNSEL TO THE DEBTOR, FOR THE PERIOD
FROM OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025**

Date Retention Approved: January 30, 2023, *nunc pro tunc* to December 14, 2022

Date Budget Approved by Client: September 3, 2025

CATEGORY OF TIMEKEEPER	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER ²	APPROXIMATE HOURLY RATE
Partners	6	\$1,265 – \$1,895
Counsel	4	\$1,210 – \$1,360
Associates	15	\$655 – \$1,165
Professional Staff	4	\$370 – \$650
Paralegals	2	\$455

¹ The Debtor in this case, along with the last four digits of the Debtor’s federal tax identification number, is: AIG Financial Products Corp. (9410). The Debtor’s address is 50 Danbury Road, Wilton, Connecticut 06897.

² These numbers reflect the timekeepers expected to bill at least 15 hours to the Chapter 11 Case during the Eleventh Interim Fee Period.

Exhibit G**Summary of Fees/Hours Budgeted Compared with Fees/Hours Billed**

Project Category	Budgeted Hours	Billed Hours	Budgeted Fees	Billed Fees
Asset Disposition	10	0.00	\$12,750.00	\$0.00
Assumption and Rejection of Leases and Contracts	10	0.00	\$12,750.00	\$0.00
Avoidance Actions	10	0.00	\$12,750.00	\$0.00
Business Operations	40	0.90	\$51,000.00	\$1,512.00
Case Administration	50	0.40	\$63,750.00	\$626.00
Claims Administration and Objections	50	0.50	\$63,750.00	\$782.50
Corporate Governance and Board Matters	50	8.90	\$63,750.00	\$16,353.50
Employment and Fee Applications	20	10.30	\$25,500.00	\$9,857.00
Employment and Fee Application Objections	10	0.00	\$12,750.00	\$0.00
Hearings	25	0.00	\$31,875.00	\$0.00
Litigation – Deferred Compensation Plan	75	14.80	\$95,625.00	\$32,394.00
Non-Working Travel	25	0.00	\$31,875.00	\$0.00
Meetings and Communications with Creditors	25	0.00	\$31,875.00	\$0.00
Plan and Disclosure Statement	100	10.30	\$127,500.00	\$18,282.50
Relief from Stay and Adequate Protection	10	0.00	\$12,750.00	\$0.00
Reporting	10	0.00	\$12,750.00	\$0.00
Tax	10	0.00	\$12,750.00	\$0.00
Totals	530	46.10	\$675,750.00	\$79,807.50

Exhibit H

Certification Regarding Application

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re:	:	Chapter 11
	:	
AIG FINANCIAL PRODUCTS CORP., ¹	:	Case No. 22-11309 (MFW)
	:	
Debtor.	:	
	:	
	X	

**CERTIFICATION OF KEITH A. SIMON IN SUPPORT OF THE
ELEVENTH INTERIM FEE APPLICATION OF LATHAM & WATKINS LLP**

1. I am a partner with the applicant firm, Latham & Watkins LLP (the “**Firm**”), and have been admitted to the bar of the State of Illinois since 1999 and the State of New York since 2008.

2. I make this certification regarding the *Eleventh Interim Fee Application of Latham & Watkins LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Bankruptcy Co-Counsel to the Debtor for the Period from October 1, 2025 through December 31, 2025* (the “**Application**”) to certify matters addressed in the *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [Docket No. 212] (the “**Interim Compensation Order**”).²

3. I have personally performed many of the legal services rendered by L&W as counsel to the Debtor in the Chapter 11 Case and am familiar with the other work performed on behalf of the Debtor by the lawyers in the firm.

¹ The Debtor in this case, along with the last four digits of the Debtor’s federal tax identification number, is: AIG Financial Products Corp. (9410). The Debtor’s address is 50 Danbury Road, Wilton, Connecticut 06897.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

4. Specifically, I have reviewed the Eleventh Interim Application, including each monthly fee application relating to the period from October 1, 2025 through and including December 31, 2025 (the “**Eleventh Interim Fee Period**”), and I hereby certify that such applications comply with the Interim Compensation Order and the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules. In addition, I hereby certify that, in accordance with the Interim Compensation Order, and in connection with preparing the Application, L&W has made a reasonable effort to comply with the U.S. Trustee’s requests for information and additional disclosures set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective November 1, 2013 (the “**U.S. Trustee Guidelines**”).

Disclosures Pursuant to the U.S. Trustee Guidelines

5. By order dated January 30, 2023 [Docket No. 124] (the “**Retention Order**”), the Court approved the *Debtor’s Application for Entry of an Order Authorizing the Employment and Retention of Latham & Watkins LLP as Bankruptcy Co-Counsel Effective as of the Petition Date* [Docket No. 74] (the “**Retention Application**”), authorizing the Debtor to retain L&W as its co-counsel in the Chapter 11 Case.

6. Eight professionals of L&W provided services to the Debtor during the Eleventh Interim Fee Period. Of those professionals, all eight of those professionals billed fewer than 15 hours.

7. L&W discussed its rates, fees, and staffing plan with the Debtor at the outset of the Eleventh Interim Fee Period and provided the Debtor with an updated budget and staffing plan, which is attached to the Application as **Exhibit F** (the “**Budget and Staffing Plan**”). The compensation sought for the Eleventh Interim Fee Period is \$595,942.50 less than the fees budgeted for the period from October 1, 2025 through December 31, 2025.

8. In accordance with the U.S. Trustee Guidelines, L&W responds to the questions identified therein as follows:

Question 1: Did L&W agree to any variations from, or alternatives to, L&W's standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the Eleventh Interim Fee Period? If so, please explain.

Answer: No.

Question 2: If the fees sought in the Application as compared to the fees budgeted for the time period covered by the Application are higher by 10% or more, did L&W discuss the reasons for the variation with the client?

Answer: The fees sought in the Application are not 10% more than the fees budgeted for the Eleventh Interim Fee Period.

Question 3: Have any of the professionals included in the Application varied their hourly rate based on geographic location of the Chapter 11 Case?

Answer: No.

Question 4: Does the Application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices?

Answer: Yes. The Application includes time and fees related to reviewing or revising time records or preparing, reviewing, or revising invoices in connection with the preparation of the Combined Monthly Fee Application relating to the Eleventh Interim Fee Period. L&W is seeking compensation for approximately 10.30 hours and \$9,857.00 in fees with respect to reviewing and revising time records with respect to the preparation of such fee applications.

Question 5: Does the Application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify hours and fees.

Answer: Yes. The time and fees described in response to Question 4 above includes time expended for such matters during the Eleventh Interim Fee Period; however, such time was not separately tracked.

Question 6: Does the Application include any rate increases since L&W's retention in the Chapter 11 Case?

Answer: Yes. The billable rates for Latham attorneys are adjusted on January 1 of each year. Notice of L&W's rate increase effective as of January 1, 2025 was filed on December 30, 2024 [Docket No. 532].

Date: February 26, 2026
New York, New York

/s/ Keith A. Simon

Keith A. Simon