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AP MEWA  
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3131 Princeton Pike  
Building 5, Suite 110  
Lawrenceville, NJ 08648  
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April 13, 2023  
Invoice No.: 491913

For professional services rendered and disbursements through March 31, 2023

**Client Matter: 24718.3**

**RE: Chapter 11 Debtor**

**PROFESSIONAL SERVICES RENDERED**

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
3/01/23	DWC	B110	Email BWH and professionals	.30	600.00	180.00
3/01/23	DWC	B110	Emails with Qualcare re JSO	.60	600.00	360.00
3/02/23	DWC	B110	Emails to BWH and professionals; EANJ (Nancy Isaacson re assumption motion	.80	600.00	480.00
3/03/23	DWC	B110	Emails with EANJ re motion to assume contracts	.50	600.00	300.00
3/03/23	DWC	B110	Rvw member responses and issues from SM Law; respond with proposed course of action and response	1.20	600.00	720.00
3/06/23	DWC	B110	Emails with BWH re settlement authority; emails with SM Law and members and BWH re member negotiation issues.	2.40	600.00	1,440.00
3/06/23	LD	B110	File certificates of service regarding motion to assume all member contracts, and motion to expunge or reduce claims.	.40	250.00	100.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
3/07/23	DWC	B110	Emails with SM Law and to members re issues and settlement	1.80	600.00	1,080.00
3/08/23	DWC	B110	Emails with qualcare re proposed J SO and case ideology	1.10	600.00	660.00
3/08/23	DWC	B110	Emails with members and BWH professionals re releasing members	1.20	600.00	720.00
3/10/23	DWC	B110	Emails with BWH professionals re release and settling wit members; requirements for court order	2.10	600.00	1,260.00
3/13/23	DWC	B110	Call with Qualcare and Brainbuilders re subpoena; failure to appear	1.00	600.00	600.00
3/13/23	DWC	B110	Emails from SM LAW and to members	.80	600.00	480.00
3/14/23	DWC	B110	Rvw JSO	.80	600.00	480.00
3/14/23	DWC	B110	Emails with SM LAW re responses to memebtrs	1.10	600.00	660.00
3/14/23	DWC	B110	Calls to members re assumption motion	2.20	600.00	1,320.00
3/15/23	DWC	B110	Draft status letter to chambers	1.10	600.00	660.00
3/15/23	DWC	B110	Email brainbuilders re witness	.30	600.00	180.00
3/16/23	DMS	B110	Review notice regarding delay in closing case.	.20	800.00	160.00
3/16/23	DWC	B110	Emails with SM LAW re collection issues	.70	600.00	420.00
3/16/23	DWC	B110	Prep for IRS Mediation	1.90	600.00	1,140.00
3/17/23	DWC	B110	SM LAW emails re collection matter responses; emails to members re assumption motion	1.40	600.00	840.00
3/17/23	DWC	B110	Emails with brainbuilders re subpoena	.70	600.00	420.00
3/17/23	DWC	B110	IRS mediation	2.70	600.00	1,620.00
3/17/23	DWC	B110	Email with concord re payment of taxes	.30	600.00	180.00
3/20/23	DWC	B110	Revise 2014 notice; email brattle re correction; prep for efile	.60	600.00	360.00

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3/20/23	DWC	B110	Rvw emails from smlaw re trust doc production; email BWH re production of trust docs	1.30	600.00	780.00
3/20/23	DWC	B110	Email with BWH professionals re service of order authorizing retentions	.40	600.00	240.00
3/20/23	DWC	B110	Emails with IRS amendments to JSO	.40	600.00	240.00
3/20/23	DWC	B110	Emails re DOBI objection to state court pleadings by BWH	.40	600.00	240.00
3/21/23	GM	B190	Draft notice of motion, certification of client in support, certification in support of Donald Clarke, Esq., and Order to compel discovery.	1.50	250.00	375.00
3/21/23	DWC	B110	Draft motion to compel BrianBuilders to comply with discovery; draft motion for a protective order from BrainBuilders subpoena emailed to debtor's counsel	3.70	600.00	2,220.00
3/21/23	DWC	B110	Rvw discovery demands from SM LAW collections; email memo/recommendation to BWH	1.30	600.00	780.00
3/21/23	LD	B110	Prepare draft notice of motion and order to quash BrainBuilders' discovery request.	1.00	250.00	250.00
3/22/23	GM	B190	Research issue on standard for motion to compel compliance with subpoena to a non-party.	2.10	250.00	525.00
3/22/23	GM	B190	Email memo to Donald Clarke, Esq. regarding research on motion to compel standard.	.20	250.00	50.00
3/22/23	DWC	B110	Research subpoena to IRS service issues; emails re revisions to JSO	1.30	600.00	780.00
3/22/23	DWC	B110	Review and advise on issues including discovery production; collection amounts due; and settlement parameters, member financial ability	2.70	600.00	1,620.00
3/22/23	LD	B110	Prepare and file certificate of service regarding motion to quash BrainBuilders discovery.	.50	250.00	125.00
3/22/23	SS	B410	Finding who to properly serve subpoena at Department of Treasury.	1.20	275.00	330.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
3/22/23	SS	B410	Reading case law in motion to quash discovery; Researching case law to add to quash discovery.	2.70	275.00	742.50
3/23/23	DWC	B110	Omnibus creditor objection negotiations with central pathology, discovery issues with SM law collection litigation	1.80	600.00	1,080.00
3/23/23	SS	B410	Researching case law in support of motion to quash.	4.20	275.00	1,155.00
3/24/23	DWC	B110	Rvw draft of IRS subpoena	.40	600.00	240.00
3/24/23	DWC	B110	Email with BWH and professionals and SM Law	.40	600.00	240.00
3/24/23	DWC	B110	Rvw omnibus claim objections; revise order schedules	1.70	600.00	1,020.00
3/24/23	SS	B410	Confirming Treasury service address and receiver; Drafting subpoena to Department of Treasury.	1.00	275.00	275.00
3/24/23	SS	B410	Researching case law in support of motion to quash.	.50	275.00	137.50
3/27/23	DWC	B110	Finalize and forward IRS subpoenas	.60	600.00	360.00
3/27/23	DWC	B110	Calls and emails re creditor late request for adjournment to file claims objection	.80	600.00	480.00
3/27/23	DWC	B110	Email BWH re proposed course of action with late adjournment request	.80	600.00	480.00
3/27/23	LD	B110	Email subpoena to Guaranteed Subpoena for service.	.20	250.00	50.00
3/27/23	SS	B410	Researching case law in support of motion to quash.	7.70	275.00	2,117.50
3/28/23	GM	B190	Draft Rule 34 document request	.30	250.00	75.00
3/28/23	DWC	B110	Rvw and finalize subpoena for IRS converted to doc demand	.40	600.00	240.00
3/28/23	DWC	B110	Revise schedule of claims	.70	600.00	420.00
3/28/23	DWC	B110	Call with BWH re late adjournment request; email service provider firms re no consent to extend deadline	.90	600.00	540.00
3/28/23	DWC	B110	Multiple more email re reasonableness of late adj request	.60	600.00	360.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
3/28/23	DWC	B110	Email with final doc demand draft for acceptance of service	.30	600.00	180.00
3/28/23	DWC	B110	Email revised omnibus order to creditor and confirm; confirm with BWH	.50	600.00	300.00
3/30/23	DWC	B110	Rvw brainbuilders objection; respond to chambers	.60	600.00	360.00
3/30/23	DWC	B110	Review email chain from SM Law re discovery to all members	.60	600.00	360.00
3/31/23	DWC	B110	Rvw docket for SM Law info requested by DFL	.60	600.00	360.00
3/31/23	DWC	B110	Rvw docket and pleadings for statute language and explanation for SM Law request	1.40	600.00	840.00
<b>TOTAL PROFESSIONAL SERVICES</b>						<b>\$ 37,787.50</b>

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Gina Maturi	Law CLerk	4.10	250.00	1,025.00
Daniel M Stolz	Partner	.20	800.00	160.00
Donald W. Clarke	Partner	52.20	600.00	31,320.00
Lorrie Denson	Paralegal	2.10	250.00	525.00
Sydney Schubert	Junior Associate	17.30	275.00	4,757.50
<b>TOTALS</b>		<b>75.90</b>		<b>\$ 37,787.50</b>

Reviewed and Approved for Payment

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**DISBURSEMENTS**

	<b>Description</b>	<b>Amount</b>
12/02/22	PACER SERVICE, U.S. Courts: PACER, 5252288-Q42022 - Fee for Usage From: 10/1/22 to: 12/31/22 - Amex Period Ending - 2-28-CH	1.10
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Gregory Bliakhman)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Elimelech Gelbawchs)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Ci Aya Shwartz)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Tay Davis)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Chaim Obstfeld)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Malik Rubin)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Chana Greenhaus)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Shimi Nussbaum)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Shoshana Hoffman)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Elizer Shtul)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Shraga Katz)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Maurice Jacobvitz)	27.23
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Eliyahu Haltovskiy)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Ahron Beyda)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Moshe Scheinbaum)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Yeziel Rivlin)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Rivka Falik)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Rahcel Binder)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Timur Mativetskiy)	34.07
2/23/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Elimelech Rubin)	34.07

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2/24/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020413295 (Angelo Genova)	17.07
2/24/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020437349 (Brainbuilders, LLC, Simon Nussbaum, Director)	27.23
2/24/23	UPS Delivery - UPS Delivery, Unishippers NJN, 1020437349 (Brainbuilders, LLC, Simon Nussbaum, Director)	27.23
2/28/23	Subpoena Service, Guaranteed Subpoena Service, Inc., 20230224131703 - Dkt. 21 14286 MBK, fee for subpoena service, Entity Served: Simon Nussbaum, Director of Finances.	80.00
3/01/23	Other Professional, BMC Group, Inc., 429-20230301-1 - Noticing Document, Dkt. #540 Motion to Assume All Members Contracts.	19,670.80
3/27/23	Photocopies .30 cents x 11 copies = \$ 3.30.	3.30

**TOTAL DISBURSEMENTS** Reviewed and Approved for Payment **\$ 20,501.29**

**TOTAL THIS INVOICE** Reviewed and Approved for Payment **\$ 58,288.79**



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**REMITTANCE ADVICE**

**RE: Chapter 11 Debtor**

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**BALANCE DUE THIS INVOICE**

**\$ 58,288.79**

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**Payments via Wire/ACH are welcomed at:**

Citizens Bank  
1 Citizens Drive  
Riverside, RI 02915  
ABA: 011500120

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ATTN: Accounts Receivable  
494 Broad Street  
Newark, NJ 07102-3230

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494 Broad Street  
Newark, NJ 07102  
Account: 1000893972  
Swift Code: CTZIUS33 (for international wires only)

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**TERMS: DUE UPON RECEIPT**