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[www.genovaburns.com](http://www.genovaburns.com)

AP MEWA  
ATTN: John McSorley  
c/o Concord Management Resources  
1 Mill Ridge Ln, Suite 100  
Chester, NJ 07930  
jmcsorley@concordmgt.com

January 11, 2023  
Invoice No.: 487111

For professional services rendered and disbursements through December 31, 2022

**Client Matter: 24718.3**

**RE: Chapter 11 Debtor**

**PROFESSIONAL SERVICES RENDERED**

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
12/01/22	DWC	B110	Call from member re court notice	.40	550.00	220.00
12/01/22	DWC	B110	Rvw proposed changes by IRS to JSO	.60	550.00	330.00
12/01/22	DWC	B110	Rvw proposed consent order for partner	.30	550.00	165.00
12/01/22	DWC	B110	Emails with client and team; SM LAW re motions to dismiss; discovery	.90	550.00	495.00
12/02/22	DWC	B110	Rvw emails from DFL, concord, SM Law, re member defenses, potential litigants; broker agreements; e&o; brokers training	1.80	550.00	990.00
12/02/22	DWC	B110	Rvw broker training materials; email with DFL and concord re responsibility to pursue broker policy	.60	550.00	330.00
12/02/22	DWC	B110	Call with Aetna counsel re brainbuilders and claim adjudication	.90	550.00	495.00
12/02/22	DWC	B110	Email with concord re SDA and Friedman; member/broker	.30	550.00	165.00

<b>Date</b>	<b>Atty</b>	<b>Task</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
12/02/22	DWC	B110	Rvw members issues and collection responses	1.70	550.00	935.00
12/05/22	DWC	B110	Rvw and revise draft objection to motion to dismiss member complaint	4.10	550.00	2,255.00
12/05/22	DWC	B110	Call with MMiceli re draft objection to Motion to Dismiss	.60	550.00	330.00
12/05/22	DWC	B110	Call with ERIC GARFINKLE re purchase of member; sale agreement; member info	.50	550.00	275.00
12/05/22	DWC	B110	Emails with chambers re JSO already submitted in lieu of status conf	.30	550.00	165.00
12/06/22	DWC	B110	Email from SM Law re scheduling hearings	.20	550.00	110.00
12/06/22	DWC	B110	Call and email with SM Law re detail assessment numbers	.80	550.00	440.00
12/06/22	DWC	B110	Email with Sari P re IRS JSO	.10	550.00	55.00
12/06/22	DWC	B110	Court email re no status conf in lieu of JSO	.10	550.00	55.00
12/06/22	DWC	B110	Email IRS re no status conf	.10	550.00	55.00
12/06/22	DWC	B110	Rvw assessment notes and calculation from MM at SM LAW and JM at Concord	.40	550.00	220.00
12/06/22	DWC	B110	Multiple emails re adjourning multiple motions to dismiss	.30	550.00	165.00
12/06/22	DWC	B110	Email from QualCare re SPDs from 2018; email to Concord re same	.30	550.00	165.00
12/07/22	DMS	B110	Call from member regarding assessment.	.20	750.00	150.00
12/07/22	DWC	B110	Call with SM LAW and IR profs re statutory notice	.60	550.00	330.00
12/07/22	DWC	B110	Multiple emails with SM LAW re responses to members	.90	550.00	495.00
12/07/22	DWC	B110	Multiple communications with BWH and Mediator Dickson re scheduling	.60	550.00	330.00

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12/07/22	DWC	B110	Multiple emails with qualcare re mediation scheduling an expectations	.30	550.00	165.00
12/07/22	DWC	B110	Email to and from Brad Rice re obligations in broker notice dispute	.20	550.00	110.00
12/07/22	DWC	B110	Email from SPLacona re IRS status conf	.10	550.00	55.00
12/08/22	DWC	B110	Emails from SM Law re BULDO	.40	550.00	220.00
12/08/22	DWC	B110	Call from IRS; George Hellerman re payments on claims; email write up to concord and BWH	.80	550.00	440.00
12/09/22	DWC	B110	Call with BWH re status; claim objections; assume contracts; state court pleadings to be drafted	.80	550.00	440.00
12/09/22	DWC	B110	Rvw concord docs and schedule re claims objections; request original format	.70	550.00	385.00
12/09/22	DWC	B310	Email concord re claims objections and omnibus schedule	.70	550.00	385.00
12/09/22	DWC	B185	Email concord re unexpired leases and exec contracts for assumption	.80	550.00	440.00
12/09/22	DWC	B110	Multiple emails with member reps and attorneys re complaint and resolution	.70	550.00	385.00
12/10/22	DWC	B110	Emails with SM Law and member attorneys re proposed resolutions	.80	550.00	440.00
12/11/22	DWC	B110	Emails with SM Law and member re complaint and resolution	.60	550.00	330.00
12/12/22	DWC	B110	Conference call on qualcare with QC attys; discuss mediation agreement requirements	1.10	550.00	605.00
12/12/22	DWC	B110	Email with concord re QC request for 2018 SPDs and schedules	.40	550.00	220.00
12/12/22	DWC	B110	Draft discovery responses to Hill and Johnson; RFAs	1.70	550.00	935.00
12/12/22	DWC	B110	Call from member atty re judgment and payment plan	.70	550.00	385.00

<b>Date</b>	<b>Atty</b>	<b>Task</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
12/12/22	DWC	B110	Email BWH re proposal to extend payment plans	.20	550.00	110.00
12/12/22	DWC	B110	Email SM Law re settlement requirements for member M&L and chestnut	.30	550.00	165.00
12/12/22	DWC	B110	Rvw mediation order changes	.40	550.00	220.00
12/12/22	DWC	B110	Email mediator judge steckroth and IRS re draft mediation order	.30	550.00	165.00
12/12/22	DWC	B110	Email member atty for ALL SECURE LOCK AND SAFE	.60	550.00	330.00
12/13/22	DWC	B110	Follow up wioncord on claims schedule for omnibus motion	.30	550.00	165.00
12/13/22	DWC	B110	Email from BWH and to SM Law re settlement authority	.20	550.00	110.00
12/13/22	DWC	B110	Rvw multiple emails from Concord re ALL SECURE LOCK timeline and explanation of claim payment; deny request for extension; demand answer	1.10	550.00	605.00
12/13/22	DWC	B110	Rvw schedule of claims filed and scheduled for motion to expunge; email concord re input in correct format	1.70	550.00	935.00
12/13/22	DWC	B110	Emails with members re acceptable payment timelines	.40	550.00	220.00
12/13/22	DWC	B110	Rvw list of executory contracts with Concord; request input	.60	550.00	330.00
12/13/22	DWC	B110	Draft letter to trustees discharging from service; circulate to BWH and professionals	.70	550.00	385.00
12/13/22	DWC	B110	Email chambers cc of proposed mediation order	.40	550.00	220.00
12/13/22	DWC	B110	Email concord and SM law re voicemail from member atty	.40	550.00	220.00
12/13/22	DWC	B110	Emails with SM Law re member DORSO REALTY	.40	550.00	220.00
12/13/22	DWC	B110	Email with mediator steckroth re mediation order and next steps	.20	550.00	110.00

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12/13/22	DWC	B110	Send member atty the SM Law application with the breakdown	.20	550.00	110.00
12/13/22	DWC	B110	Emails with chestnut hill atty re settlement offer amount	.60	550.00	330.00
12/13/22	DWC	B110	Emails from aetna re member info; email to concord re input	.40	550.00	220.00
12/14/22	DMS	B110	Review S. Mitnick collection report.	.20	750.00	150.00
12/14/22	DWC	B110	Call with member per DMS vmail	.60	550.00	330.00
12/14/22	DWC	B110	Rvw claims schedule from concord; modified original; returned with request for input	.80	550.00	440.00
12/14/22	DWC	B110	Email concord re repository to qualcare	.20	550.00	110.00
12/14/22	DWC	B110	Rvw information from concord re claim schedule	.60	550.00	330.00
12/14/22	DWC	B110	Email mediator and adversary availability for mediation call	.10	550.00	55.00
12/15/22	DWC	B110	Hearing on APEMT motion to extend time to object to claims or assume contracts; notice to close case	1.10	550.00	605.00
12/15/22	DWC	B110	Emails re collection amounts	.30	550.00	165.00
12/15/22	DWC	B110	Emails with sm law re payment plans available	.40	550.00	220.00
12/15/22	DWC	B110	Call with SM Law re plan projections for assessment	.70	550.00	385.00
12/15/22	DWC	B110	Draft response to member re calculation of assessment	.70	550.00	385.00
12/15/22	DWC	B110	Email sm law re trust payments; application of payment to balance	.10	550.00	55.00
12/15/22	DWC	B110	Forward relevant docs to SM Law for exhibits to objection	.30	550.00	165.00
12/15/22	DWC	B110	Rvw final draft of objection to motions to dismiss; edit and return to SM LAW	3.60	550.00	1,980.00
12/15/22	DWC	B110	Rvw concord certification re assessment calculation	.70	550.00	385.00

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12/15/22	DWC	B110	Email discussion re settlement parameters	.60	550.00	330.00
12/16/22	DWC	B110	Finalize mediation order with IRS and prep for filing	.60	550.00	330.00
12/16/22	DWC	B110	Rvw letter from member atty re member claims payments to service providers	.30	550.00	165.00
12/16/22	DWC	B110	Email with SM Law re payment schedules	.30	550.00	165.00
12/16/22	DWC	B110	Email member atty re assessment valuation and service provider claims	1.30	550.00	715.00
12/16/22	DWC	B110	Email with concord re executory contracts	.40	550.00	220.00
12/19/22	DWC	B110	Revise and final draft for letter to trustees thanking for help and discharging	.40	550.00	220.00
12/19/22	DWC	B110	Email BWH re call with insurer and special counsel	.20	550.00	110.00
12/19/22	DWC	B110	Follow up on concord input for claims objection schedules	.10	550.00	55.00
12/19/22	DWC	B110	Rvw motion to dismiss by BOLAN	.60	550.00	330.00
12/19/22	DWC	B110	Call with attorney for member re status and nature of case	.80	550.00	440.00
12/19/22	DWC	B110	Rvw motion to dismiss; draft proposed response and notes for inclusion to SM Law.	1.10	550.00	605.00
12/19/22	DWC	B110	Rvw and adjust claims objection schedules	1.80	550.00	990.00
12/20/22	DWC	B110	Rvw and propose action on filed and scheduled claims of APMET for Omnibus claim objection; request info and input from professionals	3.40	550.00	1,870.00
12/21/22	DWC	B110	Call with Steckroth re mediation scheduling	.70	550.00	385.00
12/21/22	DWC	B110	Email from and to Dr. Flores re trustee representation and issues	.30	550.00	165.00
12/21/22	DWC	B110	Email BWH re status of call with mediator	.30	550.00	165.00

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12/22/22	DWC	B110	Emails with client and professionals re outstanding prof fees	.20	550.00	110.00
12/23/22	DWC	B110	Call with BWH re status	.50	550.00	275.00
12/23/22	DWC	B110	Emails with APEMT professionals re outstanding fees	.30	550.00	165.00
12/23/22	DWC	B110	Email from and to SM Law re pending collections; dollar value outstanding	.40	550.00	220.00
12/23/22	DWC	B110	Emails with SM LAW re settlement offer	.30	550.00	165.00
12/23/22	DWC	B110	Emails with SM Law re member collection suits	1.60	550.00	880.00
12/23/22	DWC	B110	Rvw emails re merlinos database from Aetna information	.40	550.00	220.00
12/23/22	DWC	B110	Multiple emails with BWH professionals re payment of fees	.60	550.00	330.00
12/27/22	DWC	B110	Email from SariP re shebell; forward retainer	.30	550.00	165.00
12/28/22	DWC	B110	Email from and to sari P re request from Special insurance counsel	.20	550.00	110.00
12/28/22	DWC	B110	Multiple communications with SM LAw re member collections	.80	550.00	440.00
12/28/22	DWC	B110	Rvw mediator letter; forward to BWH with input	.30	550.00	165.00
12/28/22	DWC	B110	Rvw member collection demand for discovery; propose responses	2.90	550.00	1,595.00
12/28/22	DWC	B110	Rvw letter from special insurance counsel re euclid response	.40	550.00	220.00
12/29/22	DWC	B110	Rvw emails and call with DFL group re merlinos database from Aetna information	.80	550.00	440.00
12/29/22	DWC	B110	Call with BWH and professionals re Euclid coverage	.70	550.00	385.00
12/29/22	DWC	B110	Multiple emails with member re demands for more assessment information and background	.70	550.00	385.00

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12/30/22	DWC	B110	Follow up with Concord and Aetna re BrainBuilders fraud report	.40	550.00	220.00
12/30/22	DWC	B110	Multiple emails with Feltman for member info demand on assessment; email BWH and attys re request for contact	.70	550.00	385.00

**TOTAL PROFESSIONAL SERVICES** \$ 40,725.00

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Hours	Rate	Total
Daniel M Stolz	Partner	.40	750.00	300.00
Donald W. Clarke	Counsel	73.50	550.00	40,425.00
<b>TOTALS</b>		<b>73.90</b>		<b>\$ 40,725.00</b>

**DISBURSEMENTS**

Description	Amount
9/10/22 PACER SERVICE, U.S. Courts: PACER, 5252288-Q32022 - Usage From 7/1/22 - 9/30/22 - Amex Period Ending 11-30-CH	5.70
9/20/22 PACER SERVICE, U.S. Courts: PACER, 2552798-Q32022	9.80
12/07/22 Other Professional, CourtSolutions, LLC, Case: 21-14286-23 - Case: 21-14286, fee for virtual hearing, Judge: Michael Kaplan, Participant: Don Clarke, Date and Time of Hearing: 12/15/22, 10:00 AM - Amex Period Ending 12-31-DMS	50.00

**TOTAL DISBURSEMENTS** Reviewed and Approved for Payment \$ 65.50

**TOTAL THIS INVOICE** Reviewed and Approved for Payment \$ 40,790.50





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**REMITTANCE ADVICE**

**RE: Chapter 11 Debtor**

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**BALANCE DUE THIS INVOICE**

**\$ 40,790.50**

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

Investors Bank division of Citizens NA  
Short Hills, NJ

**Payments via Check can be mailed to:**

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

Genova Burns LLC  
ABA: 221272031  
Account: 1000893972  
Swift Code: IBNJUS33 (for international wires only)

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**TERMS: DUE UPON RECEIPT**