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July 11, 2023
Invoice No.: 498201

For professional services rendered and disbursements through June 30, 2023

Client Matter: 24718.3

RE: Chapter 11 Debtor

PROFESSIONAL SERVICES RENDERED

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
6/01/23	DWC	B110	Collection issues with SM Law	.40	600.00	240.00
6/01/23	DWC	B110	Draft and circulate Notice of Sub Consummation; follow up with MORS	.80	600.00	480.00
6/01/23	LD	B110	Batestamp documents for production -Brain Builders.	3.30	250.00	825.00
6/02/23	DWC	B110	Rvw emails and issues re IRS production	.60	600.00	360.00
6/05/23	DWC	B110	Rvw produced docs and email coordination of additional production	.70	600.00	420.00
6/05/23	SS	B110	Reviewing docket, draft documents and DWC notes, and analyzing remaining work to be done on same.	.60	275.00	165.00
6/06/23	SS	B110	Reviewing client documents and analyzing for discovery responses.	2.20	275.00	605.00
6/07/23	DWC	B110	Rvw and revise discovery response to BrainBuilders; rvw docs for production	3.60	600.00	2,160.00

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6/07/23	DWC	B110	Emails re bate stamping production	.40	600.00	240.00
6/07/23	DWC	B110	Email discovery production with written responses to BrainBuilders; demand dates and production; follow up meet and confer	1.80	600.00	1,080.00
6/07/23	LD	B110	Bate additional documents for BrainBuilders document production.	3.50	250.00	875.00
6/07/23	SS	B110	Reviewing client documents and analyzing for responsiveness to discovery requests.	1.90	275.00	522.50
6/07/23	SS	B110	Conferring with DWC on document production strategy.	.30	275.00	82.50
6/08/23	DWC	B110	Emails with BWH re litigation status	.40	600.00	240.00
6/08/23	DWC	B110	Emails with QualCare and BB re QC letter	.80	600.00	480.00
6/08/23	DWC	B110	Coordinate discovery production	.60	600.00	360.00
6/08/23	DWC	B110	Coordinate filing substantial consummation notice	.70	600.00	420.00
6/08/23	LD	B110	Continue bate stamping BrainBuilders documents for production.	2.50	250.00	625.00
6/08/23	LD	B110	Finalize and file notice of substantial consummation.	.30	250.00	75.00
6/09/23	DWC	B110	Update BWH on status of BB discovery issues.	.60	600.00	360.00
6/09/23	LD	B110	Email to counsel with 4/27/23 transcript.	.20	250.00	50.00
6/12/23	DWC	B110	RV multiple email with BB and QC; respond to BB re discovery deficiencies	.70	600.00	420.00
6/13/23	DWC	B110	Multiple emails answering production questions from VS	.70	600.00	420.00
6/13/23	DWC	B110	Emails coordinating deposition for simon nussbaum	.40	600.00	240.00
6/13/23	DWC	B110	Resolve tech issues with production	.40	600.00	240.00
6/13/23	DWC	B110	Review brainbuilders discovery production; email QualCare with request for input	.70	600.00	420.00

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6/13/23	DWC	B110	Rvw brainbuilders letter alleging discovery deficiencies; follow up with debtor professionals	.80	600.00	480.00
6/13/23	DWC	B110	Provide email memo update on status of claims in the BK case.	1.50	600.00	900.00
6/13/23	DWC	B110	Emails from IRA professionals re discovery from BB	.60	600.00	360.00
6/13/23	LD	B110	Review link for document production.	.20	250.00	50.00
6/13/23	SS	B110	Reviewing and analyzing deficiency letter and comparing to discovery responses and production.	.60	275.00	165.00
6/14/23	DWC	B110	Email from court re objections to notice of sub consummation	.30	600.00	180.00
6/14/23	DWC	B110	Review doc production from BB and QC	2.60	600.00	1,560.00
6/14/23	DWC	B110	Multiple emails with professionals re discovery	.90	600.00	540.00
6/14/23	SS	B110	Conferring with DWC on discovery responses and motion to compel.	.50	275.00	137.50
6/14/23	SS	B110	Reviewing joint order and updating calendars as relevant.	.10	275.00	27.50
6/14/23	SS	B110	Reviewing and updating motion to compel IRS documents.	.80	275.00	220.00
6/14/23	SS	B110	Reviewing docket orders to determine whether confidentiality covers receiver.	.80	275.00	220.00
6/14/23	SS	B110	Reviewing document requests and analyzing client documents for responses.	3.20	275.00	880.00
6/14/23	SS	B110	Researching admissibility and relevance boundaries.	2.20	275.00	605.00
6/15/23	DWC	B110	Rvw prior discovery corresp; email brainbuilders re deficiencies and propose meet and confer	.80	600.00	480.00
6/15/23	DWC	B110	Emails re discovery obligations	.70	600.00	420.00
6/15/23	SS	B110	Reviewing document requests and client documents to determine responsiveness.	1.30	275.00	357.50

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
6/15/23	SS	B110	Continuing research on boundaries of discovery relevance.	5.30	275.00	1,457.50
6/16/23	DWC	B110	Call with IR and APEMT professionals re discovery issues	1.40	600.00	840.00
6/16/23	DWC	B110	Emails re collection proofs and issues	.60	600.00	360.00
6/16/23	DWC	B110	Multiple emails and calls re last minute rescheduling of witness deposition	.80	600.00	480.00
6/16/23	DWC	B110	Multiple emails re BrainBuilders doc production	.70	600.00	420.00
6/16/23	DWC	B110	Email Aetna re docs received in adversary proceeding	.40	600.00	240.00
6/16/23	SS	B110	Drafting adversary caption page.	.10	275.00	27.50
6/16/23	SS	B110	Conference call discussing discovery responses and document production.	1.10	275.00	302.50
6/16/23	SS	B110	Reviewing adversary discovery production to cross-reference patient names.	3.60	275.00	990.00
6/19/23	DWC	B110	Multiple emails re substance of BB production and missing production	.70	600.00	420.00
6/19/23	DWC	B110	Rvw multiple emails from professionals re substance of discovery	1.20	600.00	720.00
6/19/23	SS	B110	Comparing discovery production to patient key.	1.80	275.00	495.00
6/20/23	DWC	B110	Rvw correspondence from professional team re discovery and sufficiency of proofs	1.40	600.00	840.00
6/20/23	DWC	B110	Prep for Nussbaum deposition; rvw pleadings and discovery	3.70	600.00	2,220.00
6/20/23	DWC	B110	Email circulate links to deposition	.40	600.00	240.00
6/20/23	SS	B110	Reviewing client emails and attached discovery and saving same to relevant folder.	.20	275.00	55.00
6/21/23	DWC	B110	BrainBuilders adversary - simon nussbaum deposition	7.00	600.00	4,200.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
6/21/23	DWC	B110	Call with QualCare re deposition	.60	600.00	360.00
6/21/23	DWC	B110	Emails re tech issues from IRS discovery production	.60	600.00	360.00
6/21/23	LD	B110	Emails and phone calls with Mark regarding document production for IRS.	.40	250.00	100.00
6/21/23	SS	B110	Reading email exchanges regarding discovery.	.10	275.00	27.50
6/21/23	SS	B110	Sending email to client providing draft claim form and addendum.	.10	275.00	27.50
6/21/23	SS	B110	Conferring with GNM on general claim form and addendum.	.30	275.00	82.50
6/21/23	SS	B110	Revising general proof of claim form and addendum.	.30	275.00	82.50
6/21/23	SS	B110	Reviewing discovery production link and provided documents.	.20	275.00	55.00
6/21/23	SS	B110	Conferring with LD on production link and folders.	.20	275.00	55.00
6/22/23	DWC	B110	Review emails and arbitration docs from Sm law	1.30	600.00	780.00
6/22/23	DWC	B110	Forward 10 exhibits to court reporter for preparation with transcript.	.70	600.00	420.00
6/23/23	DWC	B110	Consult with electronic discovery hosting vendor	.90	600.00	540.00
6/23/23	SS	B110	Checking and gathering discovery files to determine size.	.20	275.00	55.00
6/23/23	SS	B110	Researching valid assignment of rights.	.90	275.00	247.50
6/26/23	DWC	B110	Coordinate discovery conference	.40	600.00	240.00
6/26/23	DWC	B110	Emails with brainbuilders re discovery meet and confer	.40	600.00	240.00
6/26/23	DWC	B110	Rvw notes from deposition; email memo to BWH and professionals re Nussbaum dep; rvw discovery produced	1.70	600.00	1,020.00
6/26/23	DWC	B110	Rvw collection litigation issues from SM Law	1.40	600.00	840.00
6/26/23	SS	B110	Compiling all discovery files and calculating size.	.20	275.00	55.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
6/26/23	SS	B110	Sharing discovery folders with relevant parties.	.10	275.00	27.50
6/26/23	SS	B110	Confirming discovery size and sending to vendor.	.10	275.00	27.50
6/26/23	SS	B110	Researching assignment of rights and validity of an assignment obtained after a claim is made.	3.90	275.00	1,072.50
6/27/23	DWC	B110	Emails re prep for motion to compel re brainbuilders discovery demands and production	1.10	600.00	660.00
6/27/23	DWC	B110	Email IRS re discovery concerning the email.	.40	600.00	240.00
6/27/23	DWC	B110	Emails with Vafa re meet and confer	.40	600.00	240.00
6/27/23	DWC	B110	Email adversary re discovery on email	.20	600.00	120.00
6/28/23	DWC	B110	Email with counsel for qualcare	.40	600.00	240.00
6/28/23	DWC	B110	Rvw brainbuilders motion to compel discovery	.80	600.00	480.00
6/28/23	SS	B110	Reviewing filed motion and responsive supporting documents, outlining response strategy, calculating response deadline, reviewing samples, starting research and drafting objection and cross-motion.	3.30	275.00	907.50
6/29/23	DWC	B110	Emails re collection issues;	.60	600.00	360.00
6/29/23	DWC	B110	Rvw discovery for production to QualCare; additional docs to BB	2.10	600.00	1,260.00
6/29/23	DWC	B110	Emails with qualCare atty	.40	600.00	240.00
6/29/23	SS	B110	Researching and drafting cross-motion to compel.	9.80	275.00	2,695.00
6/30/23	DWC	B110	Prep for discovery conf call; rvw proofs from BB and alleged outstanding discovery from APEMT	1.80	600.00	1,080.00
6/30/23	SS	B110	Reviewing document production for assignment of rights documents.	2.40	275.00	660.00
6/30/23	SS	B110	Continuing adding research to draft opposition and motion to compel.	3.30	275.00	907.50

TOTAL PROFESSIONAL SERVICES

\$ 51,100.00

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SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Donald W. Clarke	Partner	57.00	600.00	34,200.00
Lorrie Denson	Paralegal	10.40	250.00	2,600.00
Sydney Schubert	Junior Associate	52.00	275.00	14,300.00
TOTALS		119.40		\$ 51,100.00

Reviewed and Approved for Payment

DISBURSEMENTS

Description	Amount
5/05/23 WestLaw Research - WestLaw Research, Thomson Reuters - West Payment Center, 848453361	69.27

Reviewed and Approved for Payment

TOTAL DISBURSEMENTS \$ 69.27

TOTAL THIS INVOICE \$ 51,169.27

Reviewed and Approved for Payment

CC: dflgroup@comcast.net



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REMITTANCE ADVICE

RE: Chapter 11 Debtor

BALANCE DUE THIS INVOICE

\$ 51,169.27

Payments via Wire/ACH are welcomed at:

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TERMS: DUE UPON RECEIPT