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August 15, 2023
Invoice No.: 500104

For professional services rendered and disbursements through July 31, 2023

Client Matter: 24718.3

RE: Chapter 11 Debtor

PROFESSIONAL SERVICES RENDERED

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
7/03/23	DWC	B110	Email from and to client re case status and next steps	.80	600.00	480.00
7/04/23	DWC	B110	Rvw draft report from DFL	.80	600.00	480.00
7/05/23	DWC	B110	Conf call with BWH and all professionals re data mining and claim info	1.30	600.00	780.00
7/05/23	DWC	B110	Multiple emails re meet and confer	.60	600.00	360.00
7/05/23	DWC	B110	Emails with SM Law re collection case detail	.90	600.00	540.00
7/05/23	DWC	B110	Emails re IRS discovery	.30	600.00	180.00
7/06/23	DWC	B110	Emails re admin issues; follow up with nussbaum transcript	.80	600.00	480.00
7/06/23	DWC	B110	Circulate discovery repository to professionals	.40	600.00	240.00
7/06/23	DWC	B110	Rvw multiple emails re several collection matters with BWH professionals	1.30	600.00	780.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
7/06/23	DWC	B110	Rvw draft report	1.20	600.00	720.00
7/07/23	DWC	B110	Meet and confer with Hill defendant in collection matter (rvw discovery demands and responses)	1.40	600.00	840.00
7/07/23	DWC	B110	Emails and calls with BWH professionals re discovery responses; rvw drafts and outstanding demands	1.70	600.00	1,020.00
7/10/23	DWC	B110	Call with all professionals re claims detail from Merlino; discovery demands and production	1.20	600.00	720.00
7/10/23	DWC	B110	Review and share discovery from QualCare; coordinate moving to sharefile	2.80	600.00	1,680.00
7/10/23	DWC	B110	Rvw revised draft report	.80	600.00	480.00
7/10/23	DWC	B110	Research issues and law for cross motion and objection to compel	1.90	600.00	1,140.00
7/10/23	DWC	B110	Emails re Brinen and Hill collection discovery issues	.70	600.00	420.00
7/10/23	SS	B110	Reviewing new discovery production and saving files.	.30	275.00	82.50
7/11/23	DWC	B110	Rvw demands and production of collection action discovery	.90	600.00	540.00
7/11/23	SS	B110	Reviewing client summary documents and preparing for meeting with DWC.	.40	275.00	110.00
7/11/23	SS	B110	Conferring with DWC on cross-motion to compel and assignment of rights.	.50	275.00	137.50
7/11/23	SS	B110	Reviewing discovery production for assignment of benefits.	4.10	275.00	1,127.50
7/12/23	DWC	B110	Emails with QC atty re audio of Nussbaum deposition	.60	600.00	360.00
7/12/23	DWC	B110	Continue drafting objection to compel by BB and cross motion to compel BB; research; review file and docs produced in discovery	3.70	600.00	2,220.00
7/12/23	SS	B110	Reviewing document production for assignment of benefits.	3.60	275.00	990.00

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7/12/23	SS	B110	Gathering supporting details and documents for cross-motion to compel.	2.50	275.00	687.50
7/13/23	DWC	B110	Rvw claim memos from DFL and Concord re BBuilders discovery objection and cross motion; email professionals for additional input	2.10	600.00	1,260.00
7/13/23	DWC	B110	Call with Dawn C re BBuilders claim information	.80	600.00	480.00
7/13/23	DWC	B110	Proposed response to Hill/Brinen re discovery dispute in collection matters	.60	600.00	360.00
7/13/23	SS	B110	Drafting motion to seal documents.	2.00	275.00	550.00
7/13/23	SS	B110	Finding and pulling all assignment of benefits from adversary discovery production and adding to spreadsheet.	2.40	275.00	660.00
7/13/23	SS	B110	Reviewing transcript and pulling relevant portions to support motion.	4.10	275.00	1,127.50
7/14/23	DWC	B110	Multiple emails from SM Law re collection issues	.60	600.00	360.00
7/14/23	SS	B110	Reviewing provided discovery documents for assignment of benefits.	2.50	275.00	687.50
7/17/23	DWC	B110	Rvw Nussbaum transcript and exhibits	1.80	600.00	1,080.00
7/17/23	DWC	B110	Rvw comments to report from B rice	.60	600.00	360.00
7/17/23	DWC	B110	Review reply in support of motion to dismiss by Auto Tech Driving in collection matter with SM Law	.70	600.00	420.00
7/17/23	SS	B110	Researching case law discussing reimbursement for insurance carrier change and drafting case summary document.	6.10	275.00	1,677.50
7/17/23	SS	B110	Reviewing discovery production for assignment of benefits.	1.60	275.00	440.00
7/18/23	DWC	B110	Continue drafting and revising objection and motion to compel re BBuilders discovery; rvw SS exhibit organization	4.30	600.00	2,580.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
7/18/23	DWC	B110	Assign additional research and draft pleadings projects to SS	.60	600.00	360.00
7/18/23	SS	B110	Finishing reviewing discovery, pulling assignment of benefits, analyzing and adding each to spreadsheet.	3.10	275.00	852.50
7/18/23	SS	B110	Researching case law discussing contingent and unliquidated claims.	3.30	275.00	907.50
7/19/23	SS	B110	Reviewing most recent draft opposition and cross-motion.	.60	275.00	165.00
7/19/23	SS	B110	Researching case law discussing contingent and unliquidated claims.	2.60	275.00	715.00
7/20/23	DWC	B110	Finalize draft objection and cross motion for BB discovery; review, gather, organize exhibits; draft motion to seal and app and order shortening notice	5.70	600.00	3,420.00
7/20/23	LD	B110	Redact exhibits for cross-motion, revisions to cross-motion, prepare documents for filing.	1.50	250.00	375.00
7/20/23	LD	B110	File opposition and cross motion to motion to compel, motion to seal and order shortening time.	1.00	250.00	250.00
7/20/23	LD	B110	Email filed motion to seal and order shortening time to Chambers.	.20	250.00	50.00
7/20/23	SS	B110	Drafting research summary document and sending same to DWC with pulled case law.	.60	275.00	165.00
7/21/23	DWC	B110	Calls emails with BNadler re scheduling of cross motion	.60	600.00	360.00
7/21/23	DWC	B110	Emails calls re collection matters	.40	600.00	240.00
7/21/23	LD	B110	Serve entered order shortening time and opposition papers on parties.	.20	250.00	50.00
7/21/23	LD	B110	Prepare and file certificate of service re opposition papers and order shortening time.	.40	250.00	100.00
7/22/23	DWC	B110	Emails re collection matters	.30	600.00	180.00
7/22/23	DWC	B110	Emails re collection matters; discovery; replies	.40	600.00	240.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
7/24/23	DWC	B110	Call and emails with BNadler re extending time for hearing on cross motion; emails to chambers re same	1.60	600.00	960.00
7/24/23	DWC	B110	Rvw file for status of all contested matters; discovery; JSOs	2.10	600.00	1,260.00
7/24/23	DWC	B110	Assign SS research ; rvw SS research; call and emails re same	1.80	600.00	1,080.00
7/24/23	DWC	B110	Multiple emails re various collection matters	.60	600.00	360.00
7/24/23	SS	B110	Reviewing draft discovery demand responses and production list and determining next steps.	.50	275.00	137.50
7/24/23	SS	B110	Research for upcoming motion.	1.50	275.00	412.50
7/25/23	DWC	B110	Rvw QCare discovery production	2.30	600.00	1,380.00
7/25/23	DWC	B110	Rvw collection emails	.60	600.00	360.00
7/26/23	DWC	B110	Emails with professionals re discovery and collection matters	.60	600.00	360.00
7/26/23	DWC	B110	Rvw updated IRS motion to compel from SS	.80	600.00	480.00
7/26/23	SS	B110	Revising motion to compel application, notice, and order.	1.80	275.00	495.00
7/26/23	SS	B110	Research in preparation for upcoming QC motion.	1.40	275.00	385.00
7/26/23	SS	B110	Research in preparation for upcoming BB motion.	1.20	275.00	330.00
7/27/23	DWC	B110	Call with Sm Law	1.10	600.00	660.00
7/28/23	SS	B110	Research in preparation for upcoming QC motion.	1.20	275.00	330.00
7/31/23	DWC	B110	Call with brett Theisen re discovery issues and amended JSO	.60	600.00	360.00
7/31/23	DWC	B110	Collection emails	.60	600.00	360.00
7/31/23	SS	B110	Research in preparation for upcoming QC motion.	1.30	275.00	357.50
7/31/23	SS	B110	Research in preparation for upcoming BB motion.	1.10	275.00	302.50

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TOTAL PROFESSIONAL SERVICES **\$ 48,437.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Donald W. Clarke	Partner	56.30	600.00	33,780.00
Lorrie Denson	Paralegal	3.30	250.00	825.00
Sydney Schubert	Junior Associate	50.30	275.00	13,832.50
TOTALS		109.90		\$ 48,437.50

Reviewed and Approved for Payment

DISBURSEMENTS

	Description	Amount
1/06/23	PACER SERVICE, U.S. Courts: PACER, 2522798-Q22023	6.90
3/23/23	PACER SERVICE, U.S. Courts: PACER, 2552798-Q12023 - Amex Period Ending 5-31-CH	17.70
7/07/23	Court Reporter, Veritext Corp., 6692143 - Court Reporter Fee - Courts / Trials / Bankruptcy, Witness: Simon Nussbaum. Job #: 5974878, Job Date: 6/21/23.	2,115.80

TOTAL DISBURSEMENTS Reviewed and Approved for Payment **\$ 2,140.40**

TOTAL THIS INVOICE Reviewed and Approved for Payment **\$ 50,577.90**

CC: dflgroup@comcast.net



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REMITTANCE ADVICE

RE: Chapter 11 Debtor

BALANCE DUE THIS INVOICE

\$ 50,577.90

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Payments via Wire/ACH are welcomed at:

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

Payments via Check can be mailed to:

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

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

To Pay by Credit/ Debit Card, please click here: [Pay Now](#)

TERMS: DUE UPON RECEIPT