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November 10, 2023  
Invoice No.: 504439

For professional services rendered and disbursements through October 31, 2023

**Client Matter: 24718.3**

**RE: Chapter 11 Debtor**

**PROFESSIONAL SERVICES RENDERED**

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
9/27/23	RES	B110	Drafting answer to Gershon counterclaim. Call with SS to discuss expectations for counterclaim draft. Create draft of counterclaim. Send to SS for feedback.	1.70	250.00	425.00
10/02/23	DWC	B190	Coordinate filing final draft of answer to counterclaim and NOAs	.70	600.00	420.00
10/02/23	DWC	B110	Email from and to concord re aetna runout issues	.50	600.00	300.00
10/02/23	DWC	B110	Rvw aetna MSA approved by court order	.60	600.00	360.00
10/02/23	DWC	B190	Email with Megna atty re discovery issues in QC/BB litigation	.30	600.00	180.00
10/02/23	DWC	B110	Email from BWH re answer to counterclaim	.20	600.00	120.00
10/02/23	SS	B110	Finalizing notices of appearance, answer to counterclaim, and exhibit.	.20	275.00	55.00
10/03/23	DWC	B190	Emails re service of pleadings in Collection Matters	.50	600.00	300.00

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10/03/23	DWC	B110	Call with MM re service of pleadings in collection matters	.50	600.00	300.00
10/03/23	DWC	B110	Email magna atty re conf call	.40	600.00	240.00
10/03/23	SS	B110	Conferring with DWC on filing answer to counterclaim and upcoming conference call.	.20	275.00	55.00
10/03/23	SS	B110	Coordinating filing answer to counterclaim.	.10	275.00	27.50
10/04/23	DWC	B110	Call with magna atty re QC and BB discovery issues	.80	600.00	480.00
10/04/23	DWC	B110	Email and internal follow up re payments to professionals	.40	600.00	240.00
10/04/23	DWC	B190	Emails from and to concord and BWH professionals re privilege in trustee packages	.60	600.00	360.00
10/04/23	DWC	B190	Emails with PM re trustee board disclosures with magna	.40	600.00	240.00
10/04/23	DWC	B190	Letter and discovery production from BB to APEMT and QC	2.20	600.00	1,320.00
10/04/23	SS	B110	Conference call with DWC and outside counsel regarding discovery.	.40	275.00	110.00
10/04/23	SS	B110	Conferring with DWC on discovery next steps.	.10	275.00	27.50
10/04/23	SS	B110	Reviewing client document for relevant report.	.30	275.00	82.50
10/04/23	SS	B110	Email to client regarding conference call.	.10	275.00	27.50
10/04/23	SS	B110	Correspondence with outside counsel regarding Answer to Counterclaim.	.10	275.00	27.50
10/04/23	SS	B110	Reviewing correspondence with client regarding discovery.	.10	275.00	27.50
10/04/23	SS	B110	Correspondence with DWC and PWM regarding phone call.	.10	275.00	27.50
10/04/23	SS	B110	Creating file of newly produced documents.	3.10	275.00	852.50

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/05/23	PWM	B110	Exchange emails with D. Clarke regarding estimate of case exposure posed by BrainBuilders claims in 2021.	.20	600.00	120.00
10/05/23	DWC	B190	Emails with PM re Megna disclosures in trustee board minutes	.30	600.00	180.00
10/05/23	DWC	B190	Emails with SM Law re discovery responses; rvw pleadings and discovery with economy freight	2.10	600.00	1,260.00
10/05/23	DWC	B190	Rvw DFL email memo re BB discovery production; rvw memo and discovery referenced	.80	600.00	480.00
10/05/23	SS	B110	Reviewing correspondence with client regarding discovery.	.20	275.00	55.00
10/05/23	SS	B110	Reviewing correspondence with DWC and PWM regarding prior work.	.10	275.00	27.50
10/09/23	DWC	B190	Emails from SM Law MM re collection matters (discovery responses); rvw discovery responses and respond	1.90	600.00	1,140.00
10/10/23	DMS	B110	Review pleadings filed in Shypdirect case.	.30	800.00	240.00
10/10/23	DWC	B190	Rvw proposed discovery responses from SM Law MM on collection matters	1.20	600.00	720.00
10/10/23	DWC	B190	Emails and calls coordinating deposition of C Condeluci	.60	600.00	360.00
10/11/23	DWC	B110	Email from SPLacono re claim inquiry; rvw aetna report for proof of payment	.60	600.00	360.00
10/11/23	DWC	B190	Rvw BrainBuilders litigation; prep next steps and coordinate discovery response	2.10	600.00	1,260.00
10/12/23	DMS	B110	Email with Court regarding case reassignment.	.20	800.00	160.00
10/12/23	DWC	B110	Emails with BWH transfer of case from kaplan to gravelle	.40	600.00	240.00
10/12/23	DWC	B110	Rvw dockets and pending issues in light of case transfer to Gravelle	.70	600.00	420.00

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10/12/23	DWC	B190	Rvw proposed discovery responses on collection matter from SMLAW	.90	600.00	540.00
10/12/23	DWC	B190	Emails with PM re magna discovery issues	.20	600.00	120.00
10/13/23	DWC	B110	Rvw emails from NJ courts re appearance and answer in collection matter	.70	600.00	420.00
10/13/23	DWC	B110	Coordinate service of pleadings in collection matters	.60	600.00	360.00
10/13/23	SS	B110	Reviewing deficiency notice and docket entries.	.20	275.00	55.00
10/13/23	SS	B110	Call with Judge's chambers regarding deficiency notice.	.20	275.00	55.00
10/13/23	SS	B110	Reviewing initial complaint and CIS, pulling relevant documents, and sending instructive email with same.	.50	275.00	137.50
10/14/23	DWC	B110	Emails from SB at SM LAW re state court filing status	.30	600.00	180.00
10/16/23	DWC	B190	Emails with counsel for QC and BB re draft discovery order	.40	600.00	240.00
10/16/23	DWC	B190	Email counsel for IRS re CC deposition details	.40	600.00	240.00
10/16/23	DWC	B190	Email update to client and professionals re status of IRS case and assignment to new judge	.40	600.00	240.00
10/16/23	DWC	B190	Email scheduling virtual deposition for CC by the IRS	.20	600.00	120.00
10/16/23	DWC	B110	Email from staff re state court corrective filing	.30	600.00	180.00
10/16/23	DWC	B190	Emails to anf from VS re BB response to proposed discovery Order	.30	600.00	180.00
10/16/23	SS	B110	Updating attorney calendars with deposition schedule.	.10	275.00	27.50
10/16/23	SS	B110	Coordinating updating and filing NOA with CIS.	.20	275.00	55.00
10/16/23	SS	B110	Confirming amended filing on docket.	.10	275.00	27.50
10/17/23	DWC	B190	Emails with QC and BB atty re protocol for brining new judge up to speed and finalizing discovery order	.60	600.00	360.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/17/23	DWC	B110	Email from atty for IRS re adjusting scheduling in light of additional discovery and deposition	.40	600.00	240.00
10/18/23	DWC	B190	Emails with IRS counsel re expert disclosures	.40	600.00	240.00
10/18/23	DWC	B190	Research timing and requirement of expert disclosures	.80	600.00	480.00
10/18/23	DWC	B190	Rvw BB proposed discovery order	.50	600.00	300.00
10/19/23	DWC	B190	Rvw arbitration docs for eight (8) separate collection matters; rvw pleadings and emails from MM at SM law	2.40	600.00	1,440.00
10/19/23	DWC	B190	Rvw files from SM Law on various collection matters; arbitration (not duplicate of other entry of this date)	1.70	600.00	1,020.00
10/20/23	PWM	B110	Confer with DC regarding background facts in defense of BrainBuilders claims and issue as to whether the claims were correctly p[aid.	.30	600.00	180.00
10/20/23	DWC	B190	Call with Pat M re involvement in QualCare brainbuilders case	.30	600.00	180.00
10/20/23	DWC	B190	Call with Brett T re BB proposed changes to discovery order	.60	600.00	360.00
10/20/23	DWC	B190	Email atty for IRS re expert witness availability and information	.60	600.00	360.00
10/20/23	DWC	B190	Emails with Chris C re availability and deposition and information for expert disclosures	.60	600.00	360.00
10/20/23	DWC	B190	Emails re coordinating service of collection matters in states court with SM LAW	.40	600.00	240.00
10/20/23	DWC	B190	Emails re proposed resolution with Brinen clients	.60	600.00	360.00
10/20/23	DWC	B190	Call with atty for IRS re expert disclosures and deposition; case disposition	.80	600.00	480.00
10/20/23	DWC	B190	Emails with expert witness, atty for IRS re rescheduling deposition	.40	600.00	240.00
10/20/23	SS	B110	Coordinating service of Answer to Counterclaim.	.10	275.00	27.50

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10/23/23	DWC	B190	Call with IRS atty re case disposition	.70	600.00	420.00
10/23/23	DWC	B190	Rvw discovery from collection matter; rvw pleadings and proposed dico responses from SM Law; edit and propose language	2.70	600.00	1,620.00
10/23/23	DWC	B190	Draft expert disclosures; rvw input from CCondeluci for same	2.30	600.00	1,380.00
10/23/23	SS	B110	Researching contract liability.	2.80	275.00	770.00
10/26/23	DWC	B190	Email from SM Law re collection defense atty	.40	600.00	240.00
10/27/23	DWC	B190	Rvw emails from SM LAw re contested matter issues	.70	600.00	420.00
10/30/23	DWC	B190	Email to QC re discovery order language	.30	600.00	180.00
10/30/23	SS	B110	Organizing research and sending related instructions to RES.	.20	275.00	55.00
10/31/23	DWC	B110	Rvw update from DFL; propose language to insert on update of various matters including IRS litigation and BB litigation and	1.30	600.00	780.00

**TOTAL PROFESSIONAL SERVICES** **\$ 29,537.50**

**SUMMARY OF PROFESSIONAL SERVICES** Reviewed and Approved for Payment

Name	Staff Level	Hours	Rate	Total
Patrick W. McGovern	Partner	.50	600.00	300.00
Daniel M Stolz	Partner	.50	800.00	400.00
Donald W. Clarke	Partner	43.00	600.00	25,800.00
Sydney Schubert	Junior Associate	9.50	275.00	2,612.50
R. Edward Stone	Law CLerk	1.70	250.00	425.00
<b>TOTALS</b>		<b>55.20</b>		<b>\$ 29,537.50</b>

Reviewed and Approved for Payment

**DISBURSEMENTS**

Description	Amount
10/20/23 Filing Fee, Treasurer, State of N.J., 140030-Oct.2023 - Dkt. #L 001141 22, Notice Appearance.	<b>50.00</b>

Reviewed and Approved for Payment

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**TOTAL DISBURSEMENTS**

Reviewed and Approved for Payment **\$ 50.00**

**TOTAL THIS INVOICE**

**\$ 29,587.50**

Reviewed and Approved for Payment

CC: dflgroup@comcast.net



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### REMITTANCE ADVICE

**RE: Chapter 11 Debtor**

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**BALANCE DUE THIS INVOICE**

**\$ 29,587.50**

Reviewed and Approved for Payment

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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:**

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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**