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January 16, 2024
Invoice No.: 507942

For professional services rendered and disbursements through December 31, 2023

Client Matter: 24718.3

RE: Chapter 11 Debtor

PROFESSIONAL SERVICES RENDERED

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
12/01/23	DWC	B190	Rvw expert witness transcript; forward to witness for changes	.70	600.00	420.00
12/01/23	DWC	B110	Emails with MM and SS re connecting on Gershon to work out course of action	.40	600.00	240.00
12/01/23	DWC	B110	Emails discussing status of gershon case and proposed next steps.	.40	600.00	240.00
12/01/23	SS	B110	Sending deposition transcript copy and deadline to expert witness for review and signature.	.10	275.00	27.50
12/01/23	SS	B110	Call with Marc Miceli regarding Gershon claims, discovery, and discovery extension.	.10	275.00	27.50
12/01/23	SS	B110	Correspondence with DWC, Marc Miceli, and Sue Brophy regarding Gershon claim, discovery, and next steps.	.20	275.00	55.00
12/01/23	SS	B110	Summary to DWC regarding phone call with Marc Miceli and next steps discussed.	.10	275.00	27.50

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
12/04/23	DWC	B110	Mutiple emails with BWH and professionals to coordinate meeting to discuss BB and status	.60	600.00	360.00
12/04/23	DWC	B190	Coordinate confirmation of planned meeting of professionals	.30	600.00	180.00
12/05/23	DWC	B110	Request rescheduling of professionals meeting	.20	600.00	120.00
12/05/23	DWC	B110	Email re consent of all parties to extend discovery; coordination of motion to request extension	.40	600.00	240.00
12/05/23	DWC	B190	Communication from counsel from BrainBuilders re draft scheduling order	.20	600.00	120.00
12/05/23	DWC	B110	Rvw draft joint scheduling order	.60	600.00	360.00
12/06/23	DWC	B190	Brief review of QualCare exposure assessment	.80	600.00	480.00
12/06/23	DWC	B190	Rvw QualCare draft of joint scheduling order	.60	600.00	360.00
12/06/23	DWC	B110	Meeting of all BWH professionals	.40	600.00	240.00
12/07/23	DWC	B110	Rvw arbitrators response in collection action; discuss with MarcM re law of the case and next steps	.70	600.00	420.00
12/07/23	DWC	B110	Rvw motion to extend discovery deadline in Gershon	.90	600.00	540.00
12/07/23	DWC	B110	Consult with DFL re outstanding claim exposure	.20	600.00	120.00
12/08/23	DWC	B110	Discuss pushback of BB demand to include Stern relief; reasons not entitled	.60	600.00	360.00
12/08/23	DWC	B190	Research stern issue waiver	.60	600.00	360.00
12/08/23	DWC	B110	Emails from BB atty re docket scheduling issues	.20	600.00	120.00
12/08/23	SS	B110	Reviewing court notice regarding scheduled decision on motion to extend discovery against Gershon.	.10	275.00	27.50
12/09/23	DWC	B110	Coordinate new hearing date on APEMT/BB discovery cross-motions	.20	600.00	120.00
12/11/23	DWC	B190	Rvw proposed resolution of fee dispute	.70	600.00	420.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
12/12/23	DWC	B190	Rvw discovery demands from Sheflin on collection matters; rvw reporting available and suggest resolution	1.10	600.00	660.00
12/12/23	SS	B110	Conferring with DWC on updating discovery and settlement discussions.	.30	275.00	82.50
12/13/23	DWC	B190	Rvw joint scheduling order from QC and BB	.30	600.00	180.00
12/13/23	DWC	B190	Resolve inquiries from exert witness re transcript corrections	.60	600.00	360.00
12/13/23	DWC	B110	Coordination with debtor member reps re paying member rep expenses.	.40	600.00	240.00
12/13/23	DWC	B110	Coordinate setup of online repository for expenses proofs by member	.80	600.00	480.00
12/13/23	DWC	B110	Circulate update repository and expense calculation with cocounsel and member reps	.30	600.00	180.00
12/13/23	DWC	B110	Coordinate filing objection to motion for reconsideration of HL fees	.30	600.00	180.00
12/13/23	SS	B110	Correspondence with expert witness regarding transcript review.	.10	275.00	27.50
12/14/23	DWC	B190	Call with counsel for IRS re JSO	.60	600.00	360.00
12/14/23	DWC	B190	Call coordinating final briefing schedule for resolution of IRS adversary proceeding	.80	600.00	480.00
12/14/23	DWC	B110	Rvw case; main case; BK case; Adv Pro; state court; draft and circulate outline for BWH professionals meeting	2.40	600.00	1,440.00
12/14/23	DWC	B110	Draft and circulate the revised member rep expenses per order	.60	600.00	360.00
12/15/23	DWC	B110	Prep and participation for an ALL PROFs meeting for BWH	3.30	600.00	1,980.00
12/15/23	DWC	B110	Meeting with SLong to bring up to speed on BrainBuilders	1.10	600.00	660.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
12/15/23	DWC	B110	Call with QualCare re position on settlement offer	.90	600.00	540.00
12/20/23	DWC	B110	Meeting with QualCare re their offer and settlement structure	.80	600.00	480.00
12/20/23	DWC	B190	Email status memo to BWH and professionals re call with QC attys	.60	600.00	360.00
12/20/23	DWC	B110	Rvw DFL 3rd Interim Report; propose changes and include additional information	1.20	600.00	720.00
12/20/23	DWC	B190	Draft new Joint scheduling order per call with DOJ; circulate to DOJ atty	.90	600.00	540.00
12/20/23	DWC	B190	Email with expert re transcript changes and corrections	.60	600.00	360.00
12/21/23	DWC	B110	Draft correspondence to chambers; copy DOJ	.60	600.00	360.00
12/21/23	DWC	B110	Call and email with Aetna atty re brainbuilders position and caselaw	1.30	600.00	780.00
12/21/23	DWC	B110	Emails from professionals re QualCare position/threats	.30	600.00	180.00
12/21/23	DWC	B110	Email corresp from collection attys (Sheflin) re updated information	.30	600.00	180.00
12/22/23	DWC	B190	Rvw file and organize pleadings with current information for Sheflin collection atty; draft outline for convenience and reference	1.60	600.00	960.00
12/22/23	DWC	B110	Emails with expert re transcript revision process	.30	600.00	180.00
12/22/23	DWC	B110	Rvw arbitration award and emails from collection attys at sm law	1.80	600.00	1,080.00
12/22/23	SS	B110	Conferring with DWC regarding discovery production and expert transcript review.	.10	275.00	27.50
12/22/23	SS	B110	Sending transcript and proposed changes to opposing counsel and court reporter.	.20	275.00	55.00
12/22/23	SS	B110	Revising and finalizing discovery responses to QC.	.80	275.00	220.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
12/26/23	DWC	B110	Rvw gershon discovery for use in all collection suits; revise and edit	2.20	600.00	1,320.00
12/26/23	DWC	B110	Rvw and finalize QualCare discovery responses	1.40	600.00	840.00
12/26/23	DWC	B190	Coordinate call with aetna atty to discuss BB	.30	600.00	180.00
12/26/23	SS	B110	Reviewing client edits to discovery requests.	.10	275.00	27.50
12/26/23	SS	B110	Finalizing discovery requests to Gershon.	.30	275.00	82.50
12/26/23	SS	B110	Revising and finalizing responses to QC discovery requests.	.40	275.00	110.00
12/27/23	DWC	B110	Email to chambers re JSO	.20	600.00	120.00
12/27/23	DWC	B110	Outline discovery strategy and organize team; attach relevant docs	.60	600.00	360.00
12/27/23	DWC	B110	Prepare and plan discovery litigation strategy	.60	600.00	360.00
12/28/23	DWC	B110	Coordinate with SM LAw re gershon answer to refiled complaint	.30	600.00	180.00
12/28/23	SS	B110	Reviewing research regarding contracts, preemption, and contingent claims.	.30	275.00	82.50
12/28/23	SS	B110	Correspondence with RES regarding preemption research and summary judgment motion.	.10	275.00	27.50
12/28/23	SS	B110	Updating and finalizing discovery requests to Gershon.	.10	275.00	27.50
12/28/23	SS	B110	Serving discovery requests to Gershon.	.10	275.00	27.50

TOTAL PROFESSIONAL SERVICES **\$ 24,422.50**

SUMMARY OF PROFESSIONAL SERVICES Reviewed and Approved for Payment

Name	Staff Level	Hours	Rate	Total
Donald W. Clarke	Partner	39.10	600.00	23,460.00
Sydney Schubert	Junior Associate	3.50	275.00	962.50
TOTALS		42.60		\$ 24,422.50

Reviewed and Approved for Payment

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DISBURSEMENTS

	Description	Amount
9/22/23	PACER SERVICE, U.S. Courts: PACER, 2552798-Q32023 - Amex Period Ending 11-30-CH	10.10
11/10/23	WestLaw Research - WestLaw Research, Thomson Reuters - West Payment Center, 849403699	12.60

TOTAL DISBURSEMENTS Reviewed and Approved for Payment **\$ 22.70**

TOTAL THIS INVOICE **\$ 24,445.20**

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CC: dflgroup@comcast.net



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REMITTANCE ADVICE

RE: Chapter 11 Debtor

BALANCE DUE THIS INVOICE

\$ 24,445.20

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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)

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TERMS: DUE UPON RECEIPT