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March 13, 2024
Invoice No.: 510755

For professional services rendered and disbursements through February 29, 2024

Client Matter: 24718.3

RE: Chapter 11 Debtor

PROFESSIONAL SERVICES RENDERED

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
2/01/24	DWC	B190	Trial Prep at GB in Basking Ridge; in person and virtual; professionals (concord, DFL, GB, BWH)	4.60	700.00	3,220.00
2/01/24	DWC	B190	Coordinate dispositive motion research for brainbuilders adversary	.70	700.00	490.00
2/01/24	SS	B110	Correspondence with SSL and DWC regarding summary judgment strategy.	.10	325.00	32.50
2/01/24	SS	B110	Correspondence from opposing counsel regarding QC discovery production.	.10	325.00	32.50
2/01/24	SS	B110	Researching notice obligations.	.40	325.00	130.00
2/01/24	SS	B110	Attending meeting with clients and outside counsel regarding upcoming trial preparation.	1.90	325.00	617.50
2/01/24	SSL	B150	Teams meeting regarding collection trial coordination.	1.50	550.00	825.00
2/02/24	DWC	B190	BrainBuilders discovery prep call with BWH and professionals (concord, DFL)	1.20	700.00	840.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
2/02/24	DWC	B110	Rvw letter from NJDOBI re receipt of chancery filing	.20	700.00	140.00
2/02/24	SS	B110	Correspondence with DWC regarding QC production.	.10	325.00	32.50
2/02/24	SS	B110	Conference call with DWC and clients regarding BB discovery, mediation, and exhibit list.	.60	325.00	195.00
2/02/24	SSL	B150	Teams meeting regarding discovery with DWC, SS, MaryJo Perez of DFL Group, Brian Hoffmeister, and Concord.	1.50	550.00	825.00
2/05/24	DWC	B190	Rvw file for Concord detail on assessment calculation	.70	700.00	490.00
2/05/24	SS	B110	Correspondence from outside counsel regarding BB spreadsheets.	.10	325.00	32.50
2/06/24	DWC	B110	Coordinate transfer of files to QualCare	.30	700.00	210.00
2/06/24	SS	B110	Correspondence with DWC regarding QC production.	.10	325.00	32.50
2/06/24	SS	B110	Sending QC discovery link to opposing counsel.	.10	325.00	32.50
2/08/24	SS	B110	Conferring with DWC regarding research and summary judgment.	.30	325.00	97.50
2/09/24	DWC	B190	Draft and prep summary judgment for IRS adversary proceeding	3.60	700.00	2,520.00
2/09/24	DWC	B110	Rvw and forward CC Law Policy invoice for work	.40	700.00	280.00
2/09/24	SS	B110	Researching duty to disclose.	3.50	325.00	1,137.50
2/09/24	SS	B110	Sending and summarizing research to DWC.	.10	325.00	32.50
2/12/24	DWC	B190	Appear in Morris county for trial call on microseal	3.40	700.00	2,380.00
2/12/24	DWC	B190	Emails and calls with concord re availability	.60	700.00	420.00
2/12/24	DWC	B110	Emails from professionals re obligation and economics for settlement	.60	700.00	420.00
2/12/24	DWC	B110	Communicate with other professionals re legal strategy	.40	700.00	280.00

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2/12/24	DWC	B110	Draft summary judgement vs IRS; notice, statement of facts, brief, order; rvw IRS prior motion to dismiss; rvw prior motion to suppress witness	3.80	700.00	2,660.00
2/12/24	SS	B110	Scheduling new trial date.	.10	325.00	32.50
2/12/24	SS	B110	Correspondence from outside counsel regarding upcoming trial and preparation.	.10	325.00	32.50
2/12/24	SS	B110	Reviewing court order regarding upcoming trial.	.10	325.00	32.50
2/12/24	SS	B110	Correspondence with client and DWC regarding trial and settlement.	.30	325.00	97.50
2/13/24	DWC	B190	Discuss pleading practice for failure to answer discovery	.40	700.00	280.00
2/13/24	DWC	B190	Prepare drafting summary judgement vs IRS; notice, statement of facts, brief, order	2.40	700.00	1,680.00
2/13/24	SS	B110	Correspondence with outside counsel regarding discovery end dates.	.20	325.00	65.00
2/14/24	DWC	B110	Continue drafting summary judgement vs IRS; notice, statement of facts, brief, order; rvw IRS prior motion to dismiss; rvw prior motion to suppress witness	4.60	700.00	3,220.00
2/14/24	SS	B110	Correspondence to DWC regarding Gershon discovery.	.10	325.00	32.50
2/15/24	DWC	B110	Discuss refiling in Special Civil Part	.40	700.00	280.00
2/15/24	DWC	B190	Discuss response deadline with QualCare and make reasonable accommodation for deadline adjustment	.40	700.00	280.00
2/15/24	DWC	B110	Coordinate sharefile for QualCare file transfer	.20	700.00	140.00
2/15/24	DWC	B110	Discuss file excel spreadsheet transfer from debtor	.30	700.00	210.00
2/15/24	SS	B110	Correspondence with DWC and opposing counsel regarding discovery extension.	.20	325.00	65.00
2/15/24	SS	B110	Researching case law regarding course of dealing.	1.50	325.00	487.50
2/15/24	SS	B110	Correspondence with DWC and QC counsel regarding BB spreadsheets.	.10	325.00	32.50

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
2/16/24	DWC	B110	Call with MM at SM Law and BWH and other professionals to discuss proofs and trial	.90	700.00	630.00
2/16/24	DWC	B110	Coordinate extension of deadline to file summary judgement motion	.40	700.00	280.00
2/16/24	DWC	B110	Discuss collection matter threatening to deposit funds into court	.40	700.00	280.00
2/16/24	DWC	B110	Draft summary judgment motion; proof citations	3.10	700.00	2,170.00
2/19/24	DWC	B190	Continue drafting summary judgment motion for IRS adversary	2.70	700.00	1,890.00
2/20/24	DWC	B110	Discuss draft of SJ certification for IRS matter	1.10	700.00	770.00
2/20/24	SS	B110	Correspondence from opposing counsel regarding discovery extension.	.10	325.00	32.50
2/21/24	DWC	B110	Declaration in support of motion for summary judgement	2.30	700.00	1,610.00
2/21/24	DWC	B110	Discuss summary judgement pleading with expert and BWH	.30	700.00	210.00
2/21/24	DWC	B110	Coordinate filing of SJ motion with all parts	.40	700.00	280.00
2/21/24	DWC	B190	IRS motion for summary judgment rvw and prep response	1.90	700.00	1,330.00
2/21/24	DWC	B190	Rvw and prep response to motion to quash expert testimony; rvw first case for response to IRS	2.20	700.00	1,540.00
2/21/24	LD	B190	Minor edits and file SJ Motion; email to Chambers and cc's.	1.00	275.00	275.00
2/21/24	LD	B190	Prepare and file COS re SJ Motion.	.40	275.00	110.00
2/21/24	SS	B110	Reviewing and analyzing proposed stipulation regarding exhibit list.	.10	325.00	32.50
2/21/24	SS	B110	Correspondence from DWC regarding summary judgment motion reply.	.10	325.00	32.50

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
2/21/24	SS	B110	Correspondence from DWC regarding motion to quash testimony.	.10	325.00	32.50
2/22/24	DWC	B190	Multiple communications discussing plaintiff's ability to settle or waive an assessment for shuttered business APEMT v CAPABILITY	1.20	700.00	840.00
2/23/24	DWC	B110	Rvw trial letter from SM Law to court re procedural posture of cases; propose edits	.70	700.00	490.00
2/23/24	DWC	B190	Rvw motion in limine from Sheflin; draft response on 7c and 7d not being mutually exclusive	1.20	700.00	840.00
2/23/24	DWC	B110	Rvw draft scheduling order from QualCare; propose edits	.40	700.00	280.00
2/26/24	DWC	B110	Rvw BB v Aetna opinion; circulate to BWH and professionals	.90	700.00	630.00
2/26/24	SS	B110	Researching course of dealing.	2.50	325.00	812.50
2/26/24	SS	B110	Correspondence with DWC and client summarizing recent decision.	.10	325.00	32.50
2/27/24	DWC	B110	Discuss timing of cross motion on IRS SJ; planned	.30	700.00	210.00
2/28/24	DWC	B190	Discuss and explain calculation of assessment with MM of SM Law	.60	700.00	420.00
2/28/24	DWC	B110	Rvw demands from collection defendants re information from trust; rvw website and circulate with SM LAW and MM	.60	700.00	420.00
2/28/24	SS	B110	Reviewing court docket for collections arbitration schedule.	.10	325.00	32.50
2/28/24	SS	B110	Correspondence with outside counsel regarding recent decision.	.10	325.00	32.50
2/28/24	SS	B110	Scheduling arbitration date for attorneys.	.10	325.00	32.50
2/29/24	DWC	B190	Discuss status of motion to strike for failure to answer discovery	.40	700.00	280.00

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2/29/24	SS	B110	Reviewing court notice regarding collections matters arbitration.	.10	325.00	32.50
2/29/24	SS	B110	Reviewing rules regarding requests for admission.	.10	325.00	32.50
2/29/24	SS	B110	Correspondence with DWC and outside counsel regarding status and steps for Gershon matter.	.10	325.00	32.50
2/29/24	SS	B110	Correspondence from outside counsel regarding active dockets.	.10	325.00	32.50
2/29/24	SS	B110	Reviewing spreadsheet of active dockets and status.	.20	325.00	65.00
2/29/24	SS	B110	Correspondence with outside counsel regarding upcoming trials and notices of appearance.	.10	325.00	32.50
2/29/24	SS	B110	Correspondence with DWC regarding notices of appearance.	.10	325.00	32.50
2/29/24	SS	B110	Pulling upcoming collection trial dates, parties, and other information.	.20	325.00	65.00

TOTAL PROFESSIONAL SERVICES**\$ 42,555.00****SUMMARY OF PROFESSIONAL SERVICES**

Reviewed and Approved for Payment

Name	Staff Level	Hours	Rate	Total
Donald W. Clarke	Partner	51.20	700.00	35,840.00
Lorrie Denson	Paralegal	1.40	275.00	385.00
Sydney Schubert	Junior Associate	14.40	325.00	4,680.00
Susan S. Long	Counsel	3.00	550.00	1,650.00
TOTALS		70.00		\$ 42,555.00

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DISBURSEMENTS

Description		Amount
12/15/23	Meals - Bagels for hosting a meeting with client and client associates.- Amex Period Ending 12-31-DWC	48.75
2/12/24	Parking Parking for trial call in collection matters.	5.00
TOTAL DISBURSEMENTS		\$ 53.75
TOTAL THIS INVOICE		\$ 42,608.75

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ACCOUNTS RECEIVABLE INVOICES OUTSTANDING

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
508775	2/13/24	83,845.71	.00	83,845.71
Previous Balance				\$ 83,845.71
Balance Due This Invoice				<u>\$ 42,608.75</u>
TOTAL BALANCE DUE				<u>\$ 126,454.46</u>

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CC: dflgroup@comcast.net



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REMITTANCE ADVICE

RE: Chapter 11 Debtor

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BALANCE DUE THIS INVOICE

\$ 42,608.75

Previous Balance

~~\$ 83,845.71~~

TOTAL BALANCE DUE

~~**\$ 126,454.46**~~

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

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

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TERMS: DUE UPON RECEIPT