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April 9, 2024
Invoice No.: 511878

For professional services rendered and disbursements through March 31, 2024

Client Matter: 24718.3

RE: Chapter 11 Debtor

PROFESSIONAL SERVICES RENDERED

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
3/01/24	DWC	B110	Rv case from MJ; respond with relevant case law	1.30	700.00	910.00
3/01/24	DWC	B190	Appear for arbitration	2.30	700.00	1,610.00
3/01/24	SS	B110	Correspondence with outside counsel regarding administrative dismissal research.	.10	325.00	32.50
3/02/24	DWC	B110	Review and begin drafting objection to IRS motion for SJ; circulate to professionals and expert witness for input	3.40	700.00	2,380.00
3/04/24	DWC	B110	Circulate comments and notes re outcome of arbitration	.60	700.00	420.00
3/04/24	SS	B110	Researching administrative dismissal rules.	.80	325.00	260.00
3/05/24	SS	B110	Continuing researching administrative dismissal rules.	2.00	325.00	650.00
3/05/24	SS	B110	Summarizing dismissal research to DWC.	.10	325.00	32.50
3/05/24	SS	B110	Summarizing dismissal research to outside counsel.	.10	325.00	32.50

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
3/05/24	SS	B110	Correspondence from outside counsel regarding dismissal research and next steps.	.10	325.00	32.50
3/06/24	DWC	B110	IRS Motion for Summary Judgment and Witness suppression; rvw and prrep response	2.40	700.00	1,680.00
3/06/24	SS	B110	Correspondence with outside counsel regarding filings for trial.	.20	325.00	65.00
3/06/24	SS	B110	Adding trial dates to attorney calendars.	.10	325.00	32.50
3/06/24	SS	B110	Correspondence from opposing counsel providing discovery responses.	.10	325.00	32.50
3/07/24	DWC	B110	Draft Objection to IRS SJ and WITNESS SUPPRESSION	4.60	700.00	3,220.00
3/07/24	DWC	B110	Call with Concord and SM LAW re trial prep	1.60	700.00	1,120.00
3/07/24	DWC	B110	Witness trial prep BG from Concord	1.60	700.00	1,120.00
3/07/24	SS	B110	Reviewing QC responses to discovery.	.40	325.00	130.00
3/07/24	SS	B110	Correspondence from opposing counsel regarding arbitrations.	.10	325.00	32.50
3/07/24	SS	B110	Preparing notices of appearance for upcoming trials.	.40	325.00	130.00
3/07/24	SS	B110	Coordinating filing of notices of appearance.	.10	325.00	32.50
3/07/24	SS	B110	Reviewing notices of appearance filing.	.10	325.00	32.50
3/08/24	DWC	B110	Rvw file and collect relevant pleadings to prepare SJ post mediation	1.10	700.00	770.00
3/08/24	DWC	B110	Collection trial, witness and document preparation; rvw file and docket	1.30	700.00	910.00
3/08/24	DWC	B110	Call with Sari and BWH	.70	700.00	490.00
3/08/24	DWC	B110	Revisions to IRS Objections to SJ and Witness; draft CC certification and BWH verification	3.70	700.00	2,590.00
3/09/24	DWC	B110	Coordinate certification edits with CC	1.70	700.00	1,190.00

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
3/10/24	DWC	B110	Final draft of Objection to IRS SJ and Witness suppression	2.40	700.00	1,680.00
3/11/24	DWC	B110	Confer with BWH and MM re trial call and resolution of pending collection matters.	1.40	700.00	980.00
3/11/24	DWC	B110	Follow up on sheflin motion in limine	.40	700.00	280.00
3/11/24	DWC	B110	Bench trial memo from sm law	.80	700.00	560.00
3/11/24	DWC	B110	Call with Chris Condeluci to discuss cross SJ and witness suppression	.80	700.00	560.00
3/11/24	DWC	B110	Calls with MM and BWH re collection trial call and chambers position on cases	2.60	700.00	1,820.00
3/11/24	DWC	B110	Review and circulate IRS opposition to SJ motion	1.10	700.00	770.00
3/11/24	LD	B110	Finalize and file objection to motion for summary judgment and motion in limine.	.50	275.00	137.50
3/11/24	SS	B110	Confirming filing of notices of appearance.	.10	325.00	32.50
3/11/24	SS	B110	Correspondence with outside counsel regarding status of Gershon motion.	.10	325.00	32.50
3/12/24	DWC	B110	Rvw and draft edits to reply to collection suit demand to settle	.60	700.00	420.00
3/13/24	DWC	B110	Draft reply in support of motion for SJ	2.40	700.00	1,680.00
3/14/24	DWC	B110	Draft reply in support of motion for SJ	3.10	700.00	2,170.00
3/15/24	DWC	B190	Draft reply in support of motion for summary judgment	3.10	700.00	2,170.00
3/15/24	DWC	B110	Review position suggested by SM Law on Microseal	.40	700.00	280.00
3/18/24	DWC	B110	Finalize reply in support of motion for SJ on IRS HIT tax and prep with exhibits to file	2.90	700.00	2,030.00
3/18/24	DWC	B110	Rvw proposed revised joint scheduling order to extend deadline per BB request	.60	700.00	420.00
3/18/24	DWC	B110	Rvw IRS reply in support of SJ and witness suppression	2.40	700.00	1,680.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
3/18/24	DWC	B110	Begin exhibit list drafting for chambers per mediation of BB claims: rvw docket and case file; draft exhibit list for disclosure to chambers on mediation rvw docket and case file	3.40	700.00	2,380.00
3/18/24	LD	B110	File Verified Reply of BWH.	.30	275.00	82.50
3/19/24	DWC	B110	Rvw docket and case file; draft exhibit list for disclosure to chambers on mediation	6.80	700.00	4,760.00
3/19/24	DWC	B110	Rvw transcripts from SM Law retention with favorable language supporting fee structure	1.30	700.00	910.00
3/19/24	DWC	B110	Rvw QualCare report and 3rd party QualCare claim audit	.80	700.00	560.00
3/19/24	DWC	B110	Email BWH and professionals re additional discovery to produce and include in Exhibit List	.40	700.00	280.00
3/19/24	SS	B110	Correspondence from DWC to client regarding exhibit list and spreadsheet.	.10	325.00	32.50
3/20/24	DWC	B110	Rvw docs for bate stamping and production; rvw sharelink to appropriate docs	.70	700.00	490.00
3/20/24	DWC	B110	Rvw and finalize exhibit list for BB mediation	2.30	700.00	1,610.00
3/20/24	DWC	B110	Email memo to SM LAW re fee retention	.60	700.00	420.00
3/20/24	SS	B110	Reviewing file and emails for requested transcripts.	.40	325.00	130.00
3/20/24	SS	B110	Correspondence with DWC regarding transcripts.	.10	325.00	32.50
3/20/24	SS	B110	Conferring with JH regarding transcript requests and status.	.10	325.00	32.50
3/20/24	SS	B110	Correspondence from client regarding DOL letter.	.10	325.00	32.50
3/25/24	SS	B110	Reviewing court notices regarding collections cases.	.10	325.00	32.50
3/26/24	DWC	B110	Hearing on IRS and APEMT cross motions for SJ and IRS motion in limine	4.60	700.00	3,220.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
3/26/24	DWC	B110	Update BWH and professionals on outcome of IRS hearing; success on witness suppression resistance	.80	700.00	560.00
3/27/24	DWC	B110	Begin drafting mediation statement for BB POC and QualCare adversary proceeding	4.70	700.00	3,290.00
3/27/24	DWC	B110	Prepare and finalize discovery production to parties and exhibit list for BB mediation	2.40	700.00	1,680.00
3/27/24	DWC	B110	Rvw respective exhibit lists and proposed exhibits for QualCare and BrainBuilders	2.90	700.00	2,030.00
3/27/24	LD	B110	Batestamp documents for discovery.	.60	275.00	165.00
3/27/24	SS	B110	Correspondence with DWC regarding mediation and hearing.	.10	325.00	32.50
3/27/24	SS	B110	Correspondence with outside counsel regarding further document production.	.10	325.00	32.50
3/27/24	SS	B110	Correspondence with DWC and outside counsel regarding exhibit lists.	.10	325.00	32.50
3/27/24	SS	B110	Reviewing BB exhibits list.	.10	325.00	32.50
3/27/24	SS	B110	Reviewing BB deponents list.	.10	325.00	32.50
3/27/24	SS	B110	Reviewing APEMT exhibits list.	.10	325.00	32.50
3/27/24	SS	B110	Correspondence with outside counsel regarding exhibits and deponents.	.10	325.00	32.50
3/28/24	DWC	B110	Rvw DFL concerns of exhibit lists; respond accordingly	.50	700.00	350.00
3/28/24	DWC	B110	Rvw respective exhibit lists and proposed exhibits for QualCare and BrainBuilders	2.90	700.00	2,030.00
3/28/24	DWC	B110	Rvw respective exhibit lists and proposed exhibits for QualCare and BrainBuilders	2.90	700.00	2,030.00
3/28/24	SS	B110	Correspondence with DWC and outside counsel regarding QC exhibits.	.20	325.00	65.00
3/28/24	SS	B110	Reviewing QC exhibit and deposition lists.	.20	325.00	65.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
3/30/24	DWC	B110	Draft mediation statement in QualCare / BB adversary proceeding; circulate to BWH for comment	3.40	700.00	2,380.00
3/31/24	DWC	B110	Draft final revisions to mediation statement in QualCare / BB adversary proceeding	4.10	700.00	2,870.00

TOTAL PROFESSIONAL SERVICES **\$ 70,387.50**

SUMMARY OF PROFESSIONAL SERVICES

Reviewed and Approved for Payment

Name	Staff Level	Hours	Rate	Total
Donald W. Clarke	Partner	96.80	700.00	67,760.00
Lorrie Denson	Paralegal	1.40	275.00	385.00
Sydney Schubert	Junior Associate	6.90	325.00	2,242.50
TOTALS		105.10		\$ 70,387.50

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DISBURSEMENTS

	Description	Amount
1/23/24	Parking - Station Plza Parking-Trenton, NJ - Amex Period Ending 1-31-DWC	11.00
2/07/24	WestLaw Research - WestLaw Research, Thomson Reuters - West Payment Center, 849864622	67.98
2/09/24	WestLaw Research - WestLaw Research, Thomson Reuters - West Payment Center, 849864622	213.65
3/19/24	Filing Fee, Treasurer, State of N.J., 140030-March 2024 - Docket L 001165 22, Notice of Appearance.	50.00
3/19/24	Filing Fee, Treasurer, State of N.J., 140030-March 2024 - Docket L 001261 22, Notice of Appearance.	50.00
3/20/24	Filing Fee, Treasurer, State of N.J., 140030-March 2024 - Docket L 001296 22, Notice of Appearance filed.	50.00
3/20/24	Filing Fee, Treasurer, State of N.J., 140030-March 2024 - Docket L 001548 22, Notice of Appearance filed.	50.00
3/20/24	Filing Fee, Treasurer, State of N.J., 140030-March 2024 - Docket L 001187 22, Notice of Appearance filed.	50.00
3/20/24	Filing Fee, Treasurer, State of N.J., 140030-March 2024 - Docket L 001206 22, Notice of Appearance filed.	50.00

TOTAL DISBURSEMENTS Reviewed and Approved for Payment **\$ 592.63**

TOTAL THIS INVOICE **\$ 70,980.13**

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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		Reviewed and Approved for Payment	<u>\$ 70,980.13</u>
	TOTAL BALANCE DUE			\$ 154,825.84

CC: dflgroup@comcast.net



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REMITTANCE ADVICE

RE: Chapter 11 Debtor

Reviewed and Approved for Payment

BALANCE DUE THIS INVOICE	\$ 70,980.13
Previous Balance	\$ 83,845.71
TOTAL BALANCE DUE	<u><u>\$ 154,825.84</u></u>

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