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November 8, 2024
Invoice No.: 526541

For professional services rendered and disbursements through October 31, 2024

Client Matter: 24718.3

RE: Chapter 11 Debtor

PROFESSIONAL SERVICES RENDERED

Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/01/24	DWC	B110	Call with CConelucci re availability and prep for hearing on IRS SJ motions	1.10	700.00	770.00
10/01/24	DWC	B110	Email from chambers re adjournment of trial date	.20	700.00	140.00
10/01/24	DWC	B190	Email Aetna counsel re response to BB motion to compel	.20	700.00	140.00
10/01/24	DWC	B190	Rvw Aetna objection to BB motion to compel and cross motion to quash	.70	700.00	490.00
10/01/24	DWC	B190	Revise objection and joinder to Aetna objection and cross motion	.70	700.00	490.00
10/01/24	DWC	B190	Late-evening filing of objection and joinder to Aetna objection and cross motion to BB motion to compel	.80	700.00	560.00
10/01/24	DWC	B190	Multiple emails and texts to SP counsel for BWH re joinder to Aetna and Affiliated responses to BB motion to compel	.40	700.00	280.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/01/24	DWC	B110	Email from and to BWH professionals re conference call	.20	700.00	140.00
10/02/24	DWC	B110	Conference call with BWH professionals re BB discovery and next steps in Aetna litigation	.80	700.00	560.00
10/02/24	DWC	B110	Rvw sharefile of BB discovery production and coordinate correction and removal of erroneous documents	.80	700.00	560.00
10/02/24	DWC	B110	Communication with Aetna regarding documents produced by BB in response to second document request	.60	700.00	420.00
10/02/24	DWC	B110	Email with BWH re aetna cross motion	.10	700.00	70.00
10/02/24	DWC	B110	Emails regarding BB request for adjournment	.20	700.00	140.00
10/03/24	DWC	B110	Communication from chambers re adjournment of hearing on motion to compel aetna	.20	700.00	140.00
10/03/24	DWC	B190	Email chambers regarding witness availability	.20	700.00	140.00
10/03/24	DWC	B190	Advise witness and BWH re first on calendar	.20	700.00	140.00
10/03/24	DWC	B190	Review BB production of documents	2.70	700.00	1,890.00
10/03/24	DWC	B190	Multiple emails with BWH and professionals regarding BB production of documents	.60	700.00	420.00
10/04/24	DWC	B110	Call with Aetna to discuss production; coordination on litigation vs BB	1.20	700.00	840.00
10/10/24	DWC	B190	Coordinate with adversary re hearing protocol	.40	700.00	280.00
10/11/24	DWC	B110	Witness availability coordination	.40	700.00	280.00
10/14/24	DWC	B110	Emails from qualcare re status of BB claim litigation	.30	700.00	210.00
10/14/24	DWC	B110	Coordinate with witness re hearing on IRS dispositive motions	.40	700.00	280.00
10/15/24	DMS	B110	Email with DWC regarding result of hearing.	.20	900.00	180.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/15/24	DWC	B110	Update DMS on IRS hearing	.40	700.00	280.00
10/15/24	DWC	B110	Hearing and settlement discussions on BrainBuilders / QualCare / Aetna	4.50	700.00	3,150.00
10/15/24	DWC	B195	Travel for IRS hearing	2.80	700.00	1,960.00
10/16/24	DWC	B110	Rvw interim report and draft language on IRS litigation	.80	700.00	560.00
10/16/24	DWC	B110	Rvw interim report information on brainbuilders litigation	.60	700.00	420.00
10/17/24	DWC	B110	Email memo to BWH professionals re IRS hearing	.30	700.00	210.00
10/21/24	DWC	B110	Rvw inquiry re pursuit of judgment in light of the defenses	.40	700.00	280.00
10/21/24	DWC	B110	Coordinate with cocounsel re hearing on Aetna	.20	700.00	140.00
10/21/24	DWC	B110	Begin drafting SJ motion; review docket and pending and prior pleadings for context; frame argument	2.70	700.00	1,890.00
10/22/24	DWC	B110	Hearing on motion to compel Aetna to produce discovery and settlement discussions	4.10	700.00	2,870.00
10/22/24	DWC	B195	Hearing on motion to compel Aetna to produce discovery	2.70	700.00	1,890.00
10/22/24	DWC	B110	Continue drafting SJ motion; review docket and pending and prior pleadings for context; frame argument	1.90	700.00	1,330.00
10/22/24	DWC	B110	Research ERISA preemption and shepardize cases	2.90	700.00	2,030.00
10/23/24	DWC	B110	Forward Aetna counsel brainbuilders' excel data dump	.30	700.00	210.00
10/24/24	DWC	B110	Research implied contract law and available fact base, Castner decision	2.90	700.00	2,030.00
10/25/24	DWC	B110	Research and start drafting summary judgment; review Castner opinion	3.70	700.00	2,590.00
10/26/24	DWC	B110	Summarize BrainBuilders opinions	.70	700.00	490.00

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Date	Atty	Task	Description Of Services Rendered	Hours	Rate	Amount
10/29/24	DWC	B110	Draft summary judgment motion in BB litigation	2.40	700.00	1,680.00
10/29/24	DWC	B110	Begin review of hearing transcript	1.60	700.00	1,120.00
10/31/24	DWC	B110	Exchange transcript with Aetna counsel	.40	700.00	280.00

TOTAL PROFESSIONAL SERVICES**\$ 34,970.00****SUMMARY OF PROFESSIONAL SERVICES**

Reviewed and Approved for Payment

Name	Staff Level	Hours	Rate	Total
Daniel M Stolz	Partner	.20	900.00	180.00
Donald W. Clarke	Partner	49.70	700.00	34,790.00
TOTALS		49.90		\$ 34,970.00

Reviewed and Approved for Payment

DISBURSEMENTS

	Description	Amount
9/19/24	Meals - Tin June Downtown, Newark NJ - Amex Period Ending 9-30-DWC	26.70
9/30/24	Lexis-Nexis Research, RELX Inc. DBA LexisNexis, 3095366189	75.07
9/30/24	PACER SERVICE, U.S. Courts: PACER, 5252288-Q32024	2.20
9/30/24	PACER SERVICE, U.S. Courts: PACER, 2552798-Q32024	8.70
10/25/24	Court Reporter, Tracy Gribben Transcription Service, LLC, 2024-00831 - court reporter fee, 1 original copy of 45 page transcript, shpped Federal Express Overnight on 10/22/24.- Amex Period Ending 10-31-DMS	270.00

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TOTAL DISBURSEMENTS**\$ 382.67****TOTAL THIS INVOICE****\$ 35,352.67**

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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

\$ 35,352.67

Payments via Wire/ACH are welcomed at:

Citizens Bank
1 Citizens Drive
Riverside, RI 02915
ABA: 036076150

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