

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
Benitago Inc., <i>et al.</i> , ¹)	Case No. 23-11394 (SHL)
)	Jointly Administered
Debtors.)	Objection Deadline:
)	December 11, 2023 at 5:00 p.m. ET

**FIRST MONTHLY FEE APPLICATION OF DECHERT LLP FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM
SEPTEMBER 19, 2023 THROUGH OCTOBER 31, 2023**

Name of Applicant:	Dechert LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Effective Date of Retention:	Nunc Pro Tunc to September 19, 2023
Period for which compensation and reimbursement is sought:	September 19 2023 through October 31, 2023
Amount of compensation sought as actual, reasonable, and necessary:	\$423,075.00²
Eighty percent of actual, reasonable and necessary compensation:	\$338,460.00
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$191.76

This is a(n): Monthly Interim Final application.

Is this the first monthly application? Yes No

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Benitago, Inc. (4084); Acrux LLC (9391); Aludra Limited (4147); Algedi LLC (3835); Biham LLC (4095); Canopus LLC (8124); Denebola LLC (5430); Errai LLC (7652); Felis LLC (4176); Ginan LLC (2439); Hamal LLC (1775); Izar LLC (6010); Jabbar LLC (0658); Kamuy LLC (8461); Lich LLC (2892); Maasym LLC (9332); Nusakan LLC (1861); Okab LLC (6499); Phact LLC (3663); Chechia LLC (N/A); Dalim LLC (4741); Segin LLC (8849); Taiyi LLC (N/A); Veritate LLC (6416); Wazn LLC (7193); Yildun LLC (3017); Bharani LLC (1732); Alhena LLC (7613); and Revati LLC (0170). The location of the Debtors' service address for purposes of these chapter 11 cases is: 1 Liberty Street, Ste. 320, New York, New York 10006.

² This amount reflects a voluntary reduction in fees in the amount of \$15,996.79.

This application includes 6.5 hours with a value of \$3,185.00 incurred in connection with the preparation of Fee Applications.

Compensation by Individual

Name of Professional Person	Position of the Applicant	Year of Obtaining License to Practice (if Applicable)	Hourly Billing Rate (Including Changes)	Total Billed Hours	Total Compensation
David Herman	Partner	2008	1,275.00	0.30	382.50
Douglas Mannal	Partner	2001	1,650.00	106.50	175,725.00
Stephen M. Wolpert	Counsel	2007	1,175.00	53.50	62,862.50
Daniel Cherif	Associate	2014	1,140.00	23.30	26,562.00
Owen S. Haney	Associate	2022	875.00	2.80	2,450.00
James S. Moser	Associate	2023	775.00	17.90	13,872.50
Donghao Yan	Associate	2023	775.00	163.20	126,480.00
Kimberly Lloyd	Legal Assistant	N/A	435.00	5.50	2,392.50
Matthew B. Stone	Legal Assistant	N/A	490.00	25.20	12,348.00
Total				398.20	\$423,075.00
Total Amount Requested Herein					\$338,460.00

The blended hourly billing rate of professionals for all services provided during the Fee Period is \$1,062.47.

Compensation by Project Category

Code	Project Category	Total Hours	Total Fees
001	Retention and Fee Applications	47.30	39,327.00
002	DIP/Cash Collateral/Cash Management	174.80	206,685.50
006	Use, Sale, and Lease of Property	0.60	465.00
007	Business Operations and Governance	9.10	9,327.50
008	Case Administration	22.00	18,407.00
009	Claims Administration and Objections	36.70	40,351.50
013	Hearings	29.20	30,003.50
014	Litigation	5.20	5,055.00
015	Investigation	14.20	11,186.00
016	Plan/Disclosure Statement/Confirmation	2.20	2,812.50
019	Committee	56.90	59,454.50
Total		398.20	\$423,075.00

Expense Summary

Expenses Category	Total Expenses
Taxi Fare	191.76
Total	\$191.76

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OF UNSECURED CREDITORS FOR THE PERIOD FROM
SEPTEMBER 19, 2023 THROUGH OCTOBER 31, 2023**

By this monthly fee application (the “**Application**”), pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Dechert LLP (“**Dechert**”) hereby moves this Court for compensation for professional legal services rendered as attorneys to the Official Committee of Unsecured Creditors (the “**Committee**”) in the amount of **\$338,460.00** together with reimbursement for actual and necessary expenses incurred in the amount of **\$191.76**, for the period commencing September 19, 2023 through and including October 31, 2023 (the “**Fee Period**”). In support of the Application, Dechert respectfully represents as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: Benitago, Inc. (4084); Acrux LLC (9391); Aludra Limited (4147); Algedi LLC (3835); Biham LLC (4095); Canopus LLC (8124); Denebola LLC (5430); Errai LLC (7652); Felis LLC (4176); Ginan LLC (2439); Hamal LLC (1775); Izar LLC (6010); Jabbah LLC (0658); Kamuy LLC (8461); Lich LLC (2892); Maasym LLC (9332); Nusakan LLC (1861); Okab LLC (6499); Phact LLC (3663); Chechia LLC (N/A); Dalim LLC (4741); Segin LLC (8849); Taiyi LLC (N/A); Veritate LLC (6416); Wazn LLC (7193); Yildun LLC (3017); Bharani LLC (1732); Alhena LLC (7613); and Revati LLC (0170). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 1 Liberty Street, Ste. 320, New York, New York 10006.

1. Dechert was employed as counsel to the Committee in connection with these chapter 11 cases pursuant to an order entered by this Court on November 22, 2023 [Docket No. 218] (the “**Retention Order**”). The Retention Order authorized Dechert to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

2. All services for which compensation is requested by Dechert were performed for or on behalf of the Committee.

SUMMARY OF SERVICES RENDERED

3. Attached hereto as **Exhibit A** is a detailed statement of fees incurred during the Fee Period showing the amount of \$423,075.00,² of which \$338,460.00 is requested for fees in this Application. **Exhibit B** is a detailed statement of expenses paid during the Fee Period showing the amount of \$191.76 for reimbursement of expenses.

4. The services rendered by Dechert during the Fee Period are grouped into the categories set forth in **Exhibit A**. The attorneys and paralegals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in the attachments hereto.

DISBURSEMENTS

5. Dechert has incurred out-of-pocket disbursements during the Fee Period in the amount of \$191.76. This disbursement sum is broken down into categories of charges, including, among other things, document hosting and management, temporary employee expenses, expert consulting charges, telephone and telecopier toll and other charges, mail and express mail charges, special or hand delivery charges, document processing, photocopying charges, charges for mailing supplies (including, without limitation, envelopes and labels)

² This amount reflects a voluntary reduction in fees in the amount of \$15,996.79.

provided by Dechert to outside copying services for use in mass mailings, travel expenses, expenses for “working meals,” computerized research, and transcription costs.

6. A complete review of the expenses incurred for the Fee Period may be found in the attachments hereto as **Exhibit B**. To the extent such itemization is insufficient to satisfy the requirements of Rule 2016-1(a) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of New York (the “**Local Rules**”), Dechert respectfully requests that the Court waive strict compliance with such rule.

7. Costs incurred for computer assisted research are not included in Dechert’s normal hourly billing rates and, therefore, are itemized and included in Dechert’s disbursements. Pursuant to Local Rule 2016-1, Dechert represents that its rate for duplication is \$.10 per page, there is no charge for incoming or outgoing telecopier transmissions, and there is no surcharge for computerized research.

VALUATION OF SERVICES

8. Attorneys and paraprofessionals of Dechert have expended a total of 398.2 hours on behalf of the Committee in connection with the Debtors’ chapter 11 cases during the Fee Period.

9. The amount of time spent by each of these persons providing services to the Committee for the Fee Period is fully set forth in detail in **Exhibit A**. These are Dechert’s hourly rates for compensation in this case, as reflected in the Retention Application. The value of the services rendered by Dechert for the Fee Period as counsel for the Committee in these cases under chapter 11 is \$423,075.00, of which \$338,460.00 is requested for fees in this Application.

10. Dechert believes that the time entries included in Exhibit A attached hereto and the expense breakdown set forth in Exhibit B attached hereto are in compliance with the requirements of Local Rule 2016-1.

11. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

12. This Application covers the period of September 19, 2023 through and including October 31, 2023 with respect to the Committee. Dechert has and will continue to perform additional necessary services for the Committee subsequent to October 31, 2023, for which Dechert will file subsequent fee applications.

CONCLUSION

WHEREFORE, Dechert respectfully requests that (a) allowance be made to it in the sum of \$338,460.00 as compensation for necessary professional services rendered to the Committee for the Fee Period, and the sum of \$191.76 for reimbursement of actual necessary costs and expenses incurred during the Fee Period, and (b) such other relief as this Court may deem just and proper.

Dated: November 24, 2023

Respectfully submitted,

/s/ Douglas Mannal

Douglas Mannal

DECHERT LLP

1095 Avenue of the Americas

New York, New York 10036

Telephone: (212) 698-3500

Facsimile: (212) 698-3599

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*Attorneys for the Official Committee of
Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
Benitago Inc., <i>et al.</i> , ¹)	Case No. 23-11394 (SHL)
)	
Debtors.)	Jointly Administered
)	

VERIFICATION OF DOUGLAS MANNAL

I, Douglas Mannal, Esquire, hereby declare the following under penalty of perjury:

1. I am a Partner in the applicant firm, Dechert LLP, and have been admitted to the bar of New York since 2001.
2. I have personally performed some of the legal services rendered by Dechert LLP as counsel for the Committee, and I am generally familiar with all other work performed on behalf of the Committee by the lawyers and paraprofessionals in the firm.
3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

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4. I hereby certify under 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: November 24, 2023

Respectfully submitted,

/s/ Douglas Mannal _____

Douglas Mannal
DECHERT LLP
1095 Avenue of the Americas
New York, New York 10036
Telephone: (212) 698-3500
Facsimile: (212) 698-3599
douglas.mannal@dechert.com

*Attorneys for the Official Committee of
Unsecured Creditors*

EXHIBIT A

Description of Legal Services



Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036-6797
FED. ID. 23-1425587
www.dechert.com

Official Committee of Unsecured Creditors of Benitago Inc.
1 Liberty St
Suite 320
New York, NY 10006

November 3, 2023
Invoice Number 0

Firm Client Matter Number: 408863.204884

Matter Name: Benitago Inc., et al.

Professional Services Rendered Through October 31, 2023

VALUES ON THIS INVOICE ARE BILLED IN USD

TOTAL FEES FOR THIS INVOICE 423,075.00

TOTAL DISBURSEMENTS FOR THIS INVOICE 191.76

TOTAL AMOUNT DUE FOR THIS INVOICE USD 423,266.76

Payment by Wire or ACH

Bank Name: Citi Private Bank
Bank Address: 153 East 53rd St., New York, NY
Account Name: Dechert LLP Main Account
Account #: 759527772 | ABA #: 021272655 | Swift Code: CITIUS33

VALUES ON THIS INVOICE ARE BILLED IN USD

PROFESSIONAL SERVICES RENDERED:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
001 – Retention and Fee Applications				
09/19/23	Douglas Mannal	1.60	001	2,640.00
	Call with M. Dundon regarding financial advisor interviews and next steps (.2); email with M. Dundon regarding same (.2); review financial advisor pitch materials (.9); coordinate with H. Yan and M. Dundon regarding same (.3).			
09/19/23	Donghao Yan	0.40	001	310.00
	Coordinate financial advisor pitch and interview schedules (.4).			
09/20/23	Douglas Mannal	0.70	001	1,155.00
	Review financial advisor pitch materials (.7).			
09/20/23	Donghao Yan	1.30	001	1,007.50
	Coordinate financial advisor presentations (1.3).			
09/21/23	Douglas Mannal	2.00	001	3,300.00
	Prepare for presentations from potential financial advisors for the Committee (.5); attend presentations from potential financial advisors for the Committee (1.3); follow-up call with Province regarding engagement by Committee (.2).			
09/21/23	Donghao Yan	1.70	001	1,317.50
	Prepare for potential financial advisor interviews (.2); attend potential financial advisor interviews and Committee update meeting (1.3); review party in interests list (.1); email with financial advisor candidates regarding the Committee's selection (.1).			
09/22/23	Donghao Yan	0.30	001	232.50
	Review retention application precedent (.2); prepare conflicts checks for parties in interest (.1).			
10/02/23	Donghao Yan	0.30	001	232.50
	Review financial advisor's retention application (.3).			
10/05/23	James Moser	0.50	001	387.50
	Review retention application precedent (.5).			
10/06/23	Douglas Mannal	0.20	001	330.00
	Email with S. Kietlinksy regarding Province retention application (.2).			
10/06/23	Owen Haney	0.20	001	175.00
	Meeting with J. Moser regarding retention application.			
10/06/23	Matthew Stone	0.50	001	245.00
	Call with J. Moser regarding Dechert retention application (.1); review precedent regarding same (.1); revise exhibits to Dechert retention application (.3).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/06/23	James Moser	0.50	001	387.50
	Call with D. Mannal regarding retention application (.2); email with B. Stone regarding retention application (.2); confer with O. Haney regarding same (.1).			
10/07/23	Owen Haney	2.30	001	2,012.50
	Draft Dechert retention application (1.6); review precedent regarding same (.5); further revise Dechert retention application (.2).			
10/07/23	Donghao Yan	1.40	001	1,085.00
	Call with financial advisor regarding allocation of expenses (.5); review report on allocation of performance (.6); email with financial advisor regarding materials related to retention application (.3).			
10/07/23	Matthew Stone	2.70	001	1,323.00
	Revise parties-in-interest and conflicts exhibits regarding Dechert retention application (2.5); email with J. Moser regarding same (.2).			
10/08/23	Owen Haney	0.30	001	262.50
	Email with J. Moser regarding retention application (.1); review draft of same (.2).			
10/08/23	James Moser	4.20	001	3,255.00
	Revise Dechert retention application (2.4); email with Dechert firm regarding conflicts (.5); review comments from D. Mannal regarding Dechert retention application (.4); further revise Dechert retention application (.9).			
10/09/23	James Moser	0.60	001	465.00
	Revise Dechert retention application (.5); email with conflicts department regarding same (.1).			
10/10/23	Douglas Mannal	0.60	001	990.00
	Revise Benitago retention application (.4); call with M. Dundon regarding same (.2).			
10/10/23	Matthew Stone	0.20	001	98.00
	Email with financial services regarding task code revision (.1); email with D. Mannal regarding same (.1).			
10/11/23	Douglas Mannal	0.50	001	825.00
	Call with Committee members regarding retention application (.2); revise same (.3).			
10/11/23	Matthew Stone	0.90	001	441.00
	Assist in preparation of September fee statement regarding privilege and confidentiality (.8); email with D. Mannal regarding same (.1).			
10/12/23	Matthew Stone	2.50	001	1,225.00
	Assist in preparation of September fee statement regarding privilege and confidentiality.			
10/13/23	Douglas Mannal	0.90	001	1,485.00
	Email with J. Moser regarding Dechert retention application (.3); review Province retention application (.2); email with H. Yan regarding same (.1); call with V. Sticlaru regarding retention and operations of the Debtors (.3).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/13/23	Donghao Yan	1.30	001	1,007.50
	Revise financial advisor retention application (.7); discuss retention application with financial advisor (.5); email with financial advisor regarding same (.1).			
10/13/23	Matthew Stone	1.60	001	784.00
	Assist in preparation of September fee statement regarding privilege and confidentiality.			
10/13/23	James Moser	1.10	001	852.50
	Review D. Mannal comments on Dechert retention application (.3); revise Dechert retention application (.8).			
10/16/23	Douglas Mannal	0.30	001	495.00
	Review Togut and Klestdadt retention applications (.2); email with U.S. Trustee regarding same (.1).			
10/16/23	Donghao Yan	1.00	001	775.00
	Finalize exhibit to retention application (.2); draft cover email to U.S. Trustee regarding retention application (.2); review Appendix B (Large Case Fee) Guidelines (.3); review retention application for compliance with the Appendix B guidelines (.2); discuss retention applications with D. Mannal and J. Moser (.1).			
10/16/23	James Moser	0.80	001	620.00
	Review U.S. Trustee fee guidelines regarding Dechert retention application (.5); discuss same with B. Stone (.1); discuss same with H. Yan and D. Mannal (.2).			
10/19/23	Donghao Yan	2.80	001	2,170.00
	Analyze retention application for Debtors' counsel (.9); analyze retention application for Debtors' co-counsel (1.0); prepare summary regarding retention applications (.6); email with Debtors regarding the payment structure of Debtors' co-counsel (.3).			
10/20/23	Donghao Yan	0.20	001	155.00
	Review U.S. Trustee's comments to retention application (.2).			
10/23/23	Donghao Yan	0.10	001	77.50
	Email with U.S. Trustee regarding retention applications (.1).			
10/23/23	Matthew Stone	0.10	001	49.00
	Review notice of effective date; calendar interim fee application deadline for Dechert team.			
10/27/23	Douglas Mannal	0.10	001	165.00
	Email with U.S. Trustee and Dechert team regarding retention application.			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/27/23	Donghao Yan	3.30	001	2,557.50
	Email with U.S. Trustee regarding proposed order to Dechert's retention (.1); revise proposed order to Dechert's retention application (.3); draft email to-do list of tasks to finalize retention applications and circulate with team (.3); email regarding signatures to retention applications with J. Moser (.1); review financial advisor's retention application (.8); coordinate filing of retention applications (.1); review chambers' rules and local rules regarding presentment of retention applications (.5); review notice of presentment for Dechert's retention application and provide comments (.3); review Dechert's retention application and provide comments (.3); draft notice of presentment for financial advisor's retention application (.2); proofread retention applications (.3).			
10/27/23	Matthew Stone	2.40	001	1,176.00
	Assist in preparation of notice and presentment and Province retention application (.8); email with H. Yan regarding same (.1); file notice and retention application with bankruptcy court (.2); assist in preparation of notice and presentment and Dechert retention application (.9); email with J. Moser regarding same (.2); file notice and retention application with bankruptcy court (.2).			
10/27/23	James Moser	3.00	001	2,325.00
	Confer with H. Yan regarding Dechert retention application (.2); review comments to same from D. Mannal (.2); revise Dechert retention application (1.3); draft notice regarding same (1.0); email with B. Stone regarding same (.3).			
10/30/23	Matthew Stone	1.50	001	735.00
	Revise September fee statement regarding privilege and confidentiality.			
10/31/23	Matthew Stone	0.40	001	196.00
	Review certificate of service regarding Dechert and Province retention applications (.1); email with H. Yan regarding same (.1); file certificate of service with bankruptcy court (.2).			
001 SUBTOTAL HOURS AND FEES:		47.30		39,327.00
002 – DIP/Cash Collateral/Cash Management				
09/19/23	Douglas Mannal	5.50	002	9,075.00
	Research regarding company's cash management system (.4); prepare for call with Debtors' counsel regarding strategy of case and next steps (1.3); call with Debtors' counsel regarding strategy of case and next steps (.5); review Seller finance documents (.4); review CoVenture loan documents (.5); conduct legal research regarding defense to potential claims (1.3); review and comment on second day orders (1.1).			
09/20/23	Douglas Mannal	3.10	002	5,115.00
	Call with CoVenture counsel regarding case status and next steps (.5); review and comment on second day orders (2.3); office conference with H. Yan regarding same (.3).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
09/22/23	Douglas Mannal	1.10	002	1,815.00
	Prepare for kick-off meeting with Province team to discuss work plans and next steps (.3); attend kick-off meeting with Province team to discuss work plans and next steps (.8); review variance report (.2); email with Province regarding same (.1).			
09/25/23	Douglas Mannal	0.70	002	1,155.00
	Review cash management order (.7).			
09/26/23	Douglas Mannal	1.30	002	2,145.00
	Call with O. Haney and H. Yan regarding cash management and cash collateral legal research (.5); review same (.6); review shared services agreement (.2).			
09/26/23	Donghao Yan	0.80	002	620.00
	Discuss extension of objection deadline with Debtors' counsel (.1); call with D. Mannal and O. Haney regarding cash management and cash collateral research (.5); email with D. Mannal regarding legal research (.2).			
09/27/23	Douglas Mannal	4.00	002	6,600.00
	Prepare for conference call with Togut and Klestadt regarding Benitago funding of Acrux (.6); attend conference call with Togut and Klestadt regarding Benitago funding of Acrux (.9); meeting with D. Herman regarding same (.3); comment on proposed cash management order and cash collateral order (2.1).			
09/27/23	Donghao Yan	0.30	002	232.50
	Confirm extension of objection deadline with Debtors' counsel (.1); discuss cash collateral order with Debtors' counsel (.2).			
09/28/23	Douglas Mannal	6.30	002	10,395.00
	Meeting with S. Wolpert and H. Yan regarding Cash Collateral Order (.6); call with Province team regarding same (.4); revise cash collateral order (3.1); email with S. Wolpert regarding same (.3); call with Togut regarding cash collateral order (.3); review collateral package for CoVenture regarding priming lien (.3); email with Togut regarding same (.1); review and comment on revised cash collateral order (1.0); email with S. Wolpert regarding same (.2).			
09/28/23	Donghao Yan	2.80	002	2,170.00
	Review cash collateral budget (.3); discuss cash collateral motion and order with Debtors' counsel (.4); discuss cash management with financial advisor (.2); meeting regarding cash collateral motion with D. Mannal and S. Wolpert (.6); review revised cash collateral order (1.3).			
09/28/23	Stephen Wolpert	3.30	002	3,877.50
	Internal meeting with D. Mannal, H. Yan regarding cash collateral and cash management orders (.6); analyze same (.5); revise same (1.9); email with D. Mannal regarding same (.3).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
09/29/23	Douglas Mannal	6.10	002	10,065.00
	Call with Togut regarding cash management and cash collateral orders (.5); email with Togut regarding cash management and cash collateral orders (.3); prepare for additional call with Togut team regarding same (.3); attend additional call with Togut team regarding same (.9); revise cash collateral and cash management orders (3.2); call with S. Wolpert and H. Yan regarding same (.5); email with S. Wolpert regarding same (.2); further email with H. Yan and S. Wolpert regarding revisions to cash management order (.2).			
09/29/23	Donghao Yan	5.50	002	4,262.50
	Revise cash collateral order (1.0); discuss revisions to cash collateral order with D. Mannal and S. Wolpert (.5); email with Debtors' counsel regarding same (.1); attend call with Debtors' counsel discussing issues related to cash collateral (.8); review second interim cash management order (1.3); identify and summarize relevant provisions in the cash management order (.4); run and circulate redlines of multiple revised drafts of the cash management order (.2); finalize and circulate revised draft of cash management with Debtors' counsel (.1); attend call with financial advisor discussing cash management (.7); review Debtors' further revisions to the cash management order (.4).			
09/29/23	Stephen Wolpert	6.40	002	7,520.00
	Analyze revised cash management order (1.2); analyze revised cash collateral order (1.5); email with H. Yan and D. Mannal regarding same (.3); call with H. Yan and D. Mannal regarding same (.5); revise cash management order (1.4); revise cash collateral order (1.5).			
09/30/23	Donghao Yan	6.80	002	5,270.00
	Review outline for limited omnibus objection (.4); draft limited omnibus objection to the Debtors' cash collateral and cash management motion (3.6); research precedent regarding objections to cash collateral and cash management motion (1.5); review cash collateral order revisions (.9); review cash management order revisions (.4).			
09/30/23	Stephen Wolpert	1.70	002	1,997.50
	Email correspondence with D. Mannal and H. Yan regarding cash management and cash collateral issues (.4); draft limited omnibus objection (1.3).			
10/01/23	Donghao Yan	6.30	002	4,882.50
	Research case law related to cash collateral issues (1.1); revise limited omnibus objection to the Debtors' cash collateral and cash management motion (2.9); discuss limited objection with S. Wolpert (.2); revise limited objection (.8); further research case law related to cash collateral issues (.5); attend call with Debtors' counsel regarding cash collateral and cash management issues (.4); call with S. Wolpert to discuss next steps (.4).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/01/23	Stephen Wolpert	3.60	002	4,230.00
	Review and comment on draft objection from H. Yan (1.2); call with H. Yan regarding same (.4); call with Togut regarding cash collateral and cash management issues (1.0); follow up call with D. Mannal and H. Yan regarding same (1.0).			
10/02/23	Douglas Mannal	5.00	002	8,250.00
	Prepare for and attend call with Province team regarding cash management and cash collateral orders (.8); call with Debtors' counsel regarding same (.6); email correspondence with Debtors' counsel regarding same (.7); further call with Debtors' counsel regarding same (.6); follow-up call with Province and Dechert teams regarding revised cash management order (.7); outline limited objection to Cash Management Motion (.3); review and comment on cash management order (.9); call with S. Wolpert regarding same (.2); review PPP analysis regarding cash flows and projections (.2).			
10/02/23	Donghao Yan	3.00	002	2,325.00
	Review Debtors' revision to second interim cash management order (.5); discuss second interim cash management order with Debtors' counsel and financial advisor (.8); review cash management diligence response provided by the Debtors (.4); discuss objection to cash management motion with D. Mannal and S. Wolpert (.4); discuss research related to limited objection with S. Wolpert (.1); research case law related to cash management issues (.3); discuss case updates with financial advisor (.5).			
10/02/23	Stephen Wolpert	6.40	002	7,520.00
	Review and revise cash management order (.4); correspondence with D. Mannal regarding same (.1); call with D. Mannal and H. Yan and Province team regarding same (.5) correspondence with Togut regarding same (.1); call with Togut regarding same (1.0); follow up calls with D. Mannal and H. Yan (1.5); draft objection to cash management (2.8).			
10/03/23	Douglas Mannal	4.40	002	7,260.00
	Revise draft objection to cash management motion and order (1.4); call with S. Wolpert regarding same (.3); email with S. Wopert regarding same (.1); review and comment on proposed order (.7); call with Togut regarding Committee objection (.6); review redactions in objection (.2); further revisions to objection (1.1).			
10/03/23	Donghao Yan	7.30	002	5,657.50
	Revise objection to cash management motion (.7); review transcript of second day hearing regarding same (.2); review Chambers' rules on motions to seal (.4); discuss revisions to second interim cash management order with S. Wolpert (.1); revise second interim cash management order (1.2); review relevant rules on motion to seal (.5); research case law on motion to seal (.8); draft motion to seal (1.9); draft proposed order granting motion to seal (.8); further revise second interim order (.2); review redacted version of objection (.2); review lender's objection to cash management and cash collateral (.3).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/03/23	Stephen Wolpert	6.30	002	7,402.50
	Analyze cash management order (.4); analyze objections regarding same (1.1); email correspondence with H. Yan regarding same (.2); discussions with D. Mannal regarding objection (.3); review and revise objections (1.5); analysis and correspondence with internal team regarding objection, service (.7); review and analyze motion to seal (.4); correspondence regarding comments on same (.6).			
10/03/23	Matthew Stone	2.60	002	1,274.00
	Review procedures regarding motions to seal (.3); email with H. Yan regarding same (.1); review docket (.1); calendar hearing date and objection deadline regarding same (.1); assist in preparation of limited objection to cash management motion (.7); email with S. Wolpert and H. Yan regarding same (.2); file limited objection with bankruptcy court (.2); email with S. Wolpert and H. Yan regarding service of same (.1); electronically serve unredacted objection (.2); assist in preparation of motion to seal limited objection (.2); file motion to seal with bankruptcy court (.2); email with D. Mannal and S. Wolpert regarding same (.1); email with D. Mannal, S. Wolpert, and H. Yan regarding Oct. 5 hearing agenda (.1).			
10/04/23	Douglas Mannal	1.40	002	2,310.00
	Call with Togut regarding cash management order and Thursday hearing regarding same (.5); prepare for hearing regarding same (.9).			
10/04/23	Donghao Yan	0.30	002	232.50
	Review revised proposed order granting motion to seal (.2); submit revised proposed order (.1).			
10/04/23	Stephen Wolpert	0.70	002	822.50
	Review proposed order to file under seal (.3); correspondence with B. Stone, H. Yan regarding same (.1); revise same (.2); correspondence with UST regarding same (.1).			
10/05/23	Douglas Mannal	0.50	002	825.00
	Review and comment on revisions to cash management order (.3); email with S. Wolpert and H. Yan regarding same (.1); call with S. Wolpert and H. Yan regarding same (.1).			
10/05/23	Donghao Yan	1.60	002	1,240.00
	Revise motion to redact based on comments received from the U.S. Trustee (.3); email with Chambers regarding proposed order on motion to redact (.2); discuss revisions to the second interim cash management order with Debtors' counsel (.2); discuss revisions to the second interim cash management order with S. Wolpert (.3); revise proposed second interim cash management order (.5); email with Debtors' counsel regarding same (.1).			
10/05/23	Stephen Wolpert	0.80	002	940.00
	Correspondence with U.S. Trustee regarding sealing order for cash management objection (.3); correspondence with D. Mannal and H. Yan regarding same (.3); review and comment on revised proposed order (.2).			

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10/06/23	Douglas Mannal	1.40	002	2,310.00
	Prepare for conference call with Togut team regarding language in cash management order to reflect the Court's ruling at Oct. 5 hearing (.2); attend conference call with Togut team regarding language in cash management order to reflect the Court's ruling at Oct. 5 hearing (.3); review revised order (.3); email with H. Yan regarding intercompany allocations and PPP report (.2); review A&M analysis (.4).			
10/06/23	Donghao Yan	1.40	002	1,085.00
	Analyze reports on expense allocation (.7); request additional report on expense allocation from Debtors' counsel (.1); review additional report on expense allocation (.6); review Debtors' revised second interim cash management order (.3).			
10/06/23	Stephen Wolpert	0.80	002	940.00
	Call with Togut regarding cash management order (.5); review edits to same (.2); correspondence with D. Mannal and H. Yan regarding same (.1).			
10/08/23	Douglas Mannal	0.50	002	825.00
	Telephone with Province regarding allocation of expenses between Benitago and its subsidiaries (.5); review allocation of expenses between Benitago and its subsidiaries (.2).			
10/08/23	Donghao Yan	0.50	002	387.50
	Attend call with D. Mannal and financial advisor regarding allocation of expenses report (.5).			
10/09/23	Douglas Mannal	0.40	002	660.00
	Review cash management order and comments to same.			
10/09/23	Stephen Wolpert	0.60	002	705.00
	Review revised cash management order (.2); correspondence with D. Mannal and H. Yan regarding comments (.2); correspondence regarding transcript of hearing (.2).			
10/10/23	Douglas Mannal	0.80	002	1,320.00
	Email with S. Wolpert regarding Interim cash management order (.1); review same (.4); review transcript for Oct 5 hearing (.3).			
10/10/23	Stephen Wolpert	0.60	002	705.00
	Review and revise proposed interim cash management order (.4); correspondence with D. Mannal regarding same (.1); correspondence with Togut regarding same (.1).			
10/11/23	Douglas Mannal	3.80	002	6,270.00
	Call with H. Yan regarding cash collateral order (.2); email with H. Yan regarding cash collateral order (.2); revise comments to cash collateral order (2.7); emails with Togut team regarding cash collateral order (.3); call and email with Province regarding budget and cash collateral order (.4).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/11/23	Donghao Yan	5.10	002	3,952.50
	Review Debtors' revised interim cash collateral order (.9); discuss cash collateral with D. Mannal and S. Wolpert (1.6); discuss revisions to interim cash collateral order with S. Wolpert (.2); research issues related to liens (.5); draft revised interim cash collateral order (.9); research case law related to waivers (1.0).			
10/11/23	Stephen Wolpert	1.80	002	2,115.00
	Meeting with D. Mannal and H. Yan to discuss cash collateral order and related issues (1.5); review same (.3).			
10/12/23	Douglas Mannal	2.80	002	4,620.00
	Prepare for conference call with Togut team regarding modifications to cash collateral order (.2); attend conference call with Togut team regarding modifications to cash collateral order (.5); review and comment on revised cash collateral order (1.1); email with H. Yan and S. Wolpert regarding same (.2); conference with H. Yan and S. Wolpert regarding cash collateral order (.8).			
10/12/23	Donghao Yan	3.90	002	3,022.50
	Research approved cash collateral orders regarding issues related to waivers and carve-outs (1.2); review cash collateral revisions (.6); discuss cash collateral order with D. Mannal and S. Wolpert (.9); revise cash collateral order (1.2).			
10/12/23	Stephen Wolpert	3.40	002	3,995.00
	Call with Togut regarding cash collateral, term sheet (.5); review and revise cash collateral order (1.2); correspondence with H. Yan regarding same (.1); correspondence with D. Mannal, H. Yan regarding questions on same (.1); meeting with D. Mannal and H. Yan regarding same (1.5).			
10/13/23	Douglas Mannal	2.30	002	3,795.00
	Revise cash collateral order (1.2); call with H. Yan regarding same (.1); email with H. Yan regarding same (.1); call with Togut team regarding term sheet and next steps on cash collateral order (.4); research regarding Judge Lane and 552/506c decisions (1.4); email with S. Kietlinki of Province regarding budget (.1).			
10/13/23	Donghao Yan	1.00	002	775.00
	Review revised third interim cash management order (.3); email with Debtors' counsel regarding same (.1); review redline of second and third interim cash management order (.2); discuss cash collateral order with Debtors' counsel (.4).			
10/13/23	Stephen Wolpert	0.70	002	822.50
	Review revised cash management order (.3); revise same (.2); review and analyze exhibit B to cash collateral order (.2).			
10/14/23	Donghao Yan	1.10	002	852.50
	Review exhibit to cash collateral order (.3); review redlines of the cash collateral order against different drafts (.2); call with financial advisor regarding same (.6).			

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10/15/23	Donghao Yan	2.50	002	1,937.50
	Review revised cash collateral order (.9); revise cash collateral order (.4); review financial advisor's notes on discussions regarding cash collateral with Debtors' financial advisor (.5); research precedent regarding fees related to cash collateral (.7).			
10/16/23	Douglas Mannal	3.00	002	4,950.00
	Revise cash collateral order (2.5); call with H. Yan and S. Wolpert regarding same (.2); email with H. Yan and S. Wolpert regarding same (.1); call with Togut regarding next steps and revisions to cash collateral order (.2).			
10/16/23	Donghao Yan	3.40	002	2,635.00
	Revise cash collateral order (.2); email with D. Mannal and S. Wolpert regarding same (.1); review budget (.2); review lender's comments to the cash collateral order (.6); discuss cash collateral and cash management orders with D. Mannal and S. Wolpert (1.5); further revise cash collateral order (.7); email with D. Mannal and S. Wolpert regarding same (.1).			
10/16/23	Stephen Wolpert	4.00	002	4,700.00
	Correspondence with H. Yan regarding cash collateral order (.4); review and analyze markup of same (.4); draft email to D. Mannal, H. Yan regarding comments on same (.3); review revised cash management order (.2); call with D. Mannal and H. Yan regarding cash management and cash collateral orders (2); review and revise cash collateral order (.7).			
10/16/23	Matthew Stone	0.10	002	49.00
	Revise calendar regarding cash collateral and cash management objection.			
10/17/23	Douglas Mannal	0.50	002	825.00
	Email with H. Yan and S. Wolpert regarding cash management order modifications (.2); review same (.1); email with Togut team regarding adjournment of hearing on cash management and cash collateral orders (.2).			
10/17/23	Donghao Yan	1.70	002	1,317.50
	Discuss budget with Province team (.5); discuss allocation of expenses with Province team (.3); review cash procedures modifications (.4); revise cash procedures modifications (.3); proofread revised cash procedures modifications (.1); circulate revised cash procedures modifications (.1).			
10/17/23	Stephen Wolpert	0.60	002	705.00
	Correspondence with D. Mannal regarding debtor request to amend cash management procedures (.2); correspondence with Togut regarding same (.1); correspondence with H. Yan regarding notice of same (.1); review and revise notice (.2).			
10/17/23	Matthew Stone	0.30	002	147.00
	Revise calendar regarding cash collateral objection deadline (.1); register attorneys for Oct. 19 and Oct. 30 hearings (.2).			
10/18/23	Stephen Wolpert	0.60	002	705.00
	Meeting with H. Yan and D. Mannal to discuss cash issues for hearing (.4); review proposed orders in connection with same (.2).			

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10/20/23	Douglas Mannal	0.20	002	330.00
	Email with S. Wolpert regarding cash management order (.2).			
10/20/23	Donghao Yan	0.20	002	155.00
	Review revised cash management modifications (.2).			
10/20/23	Matthew Stone	0.10	002	49.00
	Calendar revised objection deadline regarding cash collateral and cash management motions.			
10/22/23	Douglas Mannal	1.20	002	1,980.00
	Review claims information and business plan (.8); email with Togut regarding same (.1); email correspondence with Province regarding same (.3).			
10/22/23	Donghao Yan	0.20	002	155.00
	Email with D. Mannal and the Province team regarding business plan (.2).			
10/23/23	Douglas Mannal	0.80	002	1,320.00
	Prepare for meeting with Province regarding cash collateral order budget, allocation, business plan and inventory (.2); attend meeting with Province regarding cash collateral order budget, allocation, business plan and inventory (.6).			
10/23/23	Donghao Yan	1.00	002	775.00
	Discuss allocation and business plan with financial advisor (.4); discuss budget and allocation with D. Mannal and financial advisor (.5); review prepetition lender's claim (.1).			
10/23/23	Stephen Wolpert	0.20	002	235.00
	Review revised cash management order (.1); correspondence with D. Mannal and H. Yan regarding same (.1).			
10/24/23	Douglas Mannal	1.60	002	2,640.00
	Review cash collateral order (.5); meet with Dechert team regarding same (.4); call with Togut team regarding cash collateral order (.3); email with K. Ortiz regarding same and business plan (.3); email with Togut team regarding mark-up (.1).			
10/24/23	Donghao Yan	3.00	002	2,325.00
	Review Debtors' revised draft of cash collateral order (.4); discuss cash collateral order with D. Mannal and S. Wolpert (.2); discuss cash collateral order with S. Wolpert (.2); review revised Exhibit B to the cash collateral order (.7); review financial advisor's proposed comments to Exhibit B (.3); discuss changes to cash collateral order with Debtors' counsel (.6); draft email summarizing call with Debtors' counsel (.2); discuss email summary with S. Wolpert (.1); email with financial advisor regarding changes to Exhibit B (.1); review carve-out under cash collateral order according to budget (.2).			
10/24/23	Stephen Wolpert	1.50	002	1,762.50
	Review revised cash collateral and cash management orders (.4); discussions with D. Mannal, H. Yan regarding same (.5); call with Togut regarding same (.6).			

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10/25/23	Douglas Mannal	1.50	002	2,475.00
	Call with Togut regarding cash collateral order (.2); email with Togut regarding cash collateral order (.2); meeting with Dechert team regarding same (.3); review and comment on cash collateral order and allocation exhibit (.8).			
10/25/23	Donghao Yan	3.40	002	2,635.00
	Discuss cash collateral order with D. Mannal and financial advisor (.5); circulate revised cash collateral with financial advisor (.1); review revised exhibit to cash collateral order and financial advisor's notes (.6); revise exhibit to cash collateral order (.3); circulate revised exhibit with a redline with the Debtors' counsel (.1); review updated budget (.4); email regarding the budget with financial advisor (.1); review newly revised exhibit to cash collateral order (.2); draft reservation of rights (1.1).			
10/25/23	Stephen Wolpert	1.70	002	1,997.50
	Review revised cash collateral order (.2); correspondence with D. Mannal and H. Yan regarding same (.3); correspondence with Togut regarding same (.3); call with Province regarding same (.5); correspondence with Province regarding same (.2); discussions with D. Mannal regarding same (.4); review comments on same (.3).			
10/26/23	Donghao Yan	0.50	002	387.50
	Review further revised cash collateral and cash management orders (.2); draft update email to Committee regarding cash collateral and cash management orders (.3).			
10/26/23	Stephen Wolpert	1.30	002	1,527.50
	Correspondence with D. Mannal regarding cash collateral order (.2); correspondence with H. Yan regarding same (.1); call with D. Mannal and H. Yan regarding same (.5); correspondence with Togut regarding same (.3); review budget in connection with same (.1); correspondence with Province regarding same (.1).			
10/26/23	Matthew Stone	0.10	002	49.00
	Email with D. Mannal regarding proposed cash management order.			
10/27/23	Douglas Mannal	0.40	002	660.00
	Review final versions of the cash collateral order and cash management order orders (.2); prepare for hearing regarding same (.2).			
10/30/23	Douglas Mannal	0.30	002	495.00
	Meet with S. Wolpert and H. Yan regarding cash collateral order and prepare for hearing.			
10/31/23	Stephen Wolpert	0.10	002	117.50
	Correspondence with D. Mannal, H. Yan regarding cash collateral and management orders.			
002 SUBTOTAL HOURS AND FEES:		174.80		206,685.50

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
006 – Use, Sale, and Lease of Property				
10/10/23	Donghao Yan	0.60	006	465.00
	Review Committee member's question regarding bid procedures (.2); review bid procedures motion and order for discussion during Committee meeting (.4).			
006 SUBTOTAL HOURS AND FEES:		0.60		465.00
007 – Business Operations and Governance				
09/20/23	Donghao Yan	1.40	007	1,085.00
	Discuss second day hearing motions with D. Mannal (.3); review second day hearing motions (.3); incorporate mark-ups to proposed orders (.5); email with Debtors' counsel regarding revised proposed orders (.2); review and discuss Debtors' counsel's proposed change to wages order with D. Mannal (.1).			
09/21/23	Donghao Yan	0.20	007	155.00
	Review final wages order (.2).			
09/25/23	Douglas Mannal	1.30	007	2,145.00
	Prepare for call with Togut regarding historical transactions and operations of the Company (.3); call with Togut regarding historical transactions and operations of the Company (1.0).			
10/01/23	Donghao Yan	1.60	007	1,240.00
	Review and summarize spreadsheet on wages payment (.5); review wages motion in connection with the spreadsheet on wages payment (.2); review final order of the vendors motion (.4); prepare summary regarding same (.3); review documents related to independent director (.2).			
10/02/23	Donghao Yan	2.40	007	1,860.00
	Review ordinary course professionals motion (1.2); review vendors motion and final order (.5); review wages motion (.3); review Debtors' answer regarding questions related to the wages motion (.2); update spreadsheet on employee salaries (.2).			
10/04/23	Douglas Mannal	0.20	007	330.00
	Email with H. Yan regarding ordinary course professionals motion (.1); review same (.1).			
10/04/23	Donghao Yan	0.90	007	697.50
	Discuss ordinary course professionals motion with Debtors' counsel (.1); summarize ordinary course professionals motion (.4); prepare email to request Committee's approval of the ordinary course professionals motion (.2); review redlines related to the final vendors order (.2).			
10/10/23	Douglas Mannal	0.20	007	330.00
	Email with Togut regarding resignation of CFO and replacement (.2).			

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10/12/23	Douglas Mannal	0.20	007	330.00
	Email with H. Yan regarding CFO issue (.1); review proposed changes regarding same (.1).			
10/17/23	Douglas Mannal	0.70	007	1,155.00
	Prepare for call with H. Yan and Province regarding work projects, business plan and budget (.2); participate in conference call with H. Yan and Province regarding work projects, business plan and budget (.5).			
007 SUBTOTAL HOURS AND FEES:		9.10		9,327.50
008 – Case Administration				
09/19/23	Douglas Mannal	0.50	008	825.00
	Meeting with D. Herman and H. Yan regarding case status and background.			
09/19/23	Donghao Yan	2.00	008	1,550.00
	Discuss administrative matters with D. Mannal and D. Herman (.5); attend call with Debtors' counsel regarding case status and strategy (.5); review materials from Debtors' counsel regarding same (1.0).			
09/20/23	Douglas Mannal	0.90	008	1,485.00
	Review case management procedures and comments to same (.7); review and comment on notice of appearance (.2).			
09/20/23	Donghao Yan	1.40	008	1,085.00
	Email with B. Stone regarding notice of appearance (.2); review same (.1); discuss notice of appearance with D. Herman (.1); discuss notice of appearance with J. Moser (.1); revise case management order (.9).			
09/20/23	Matthew Stone	1.80	008	882.00
	Prepare notice of appearance for D. Mannal and D. Herman (1.3); email with D. Herman and H. Yan regarding same (.1); email with D. Mannal regarding same (.1); file notice of appearance with bankruptcy court (.2); email with H. Yan and J. Moser regarding filing notifications (.1).			
09/20/23	James Moser	1.80	008	1,395.00
	Prepare Benitago works in progress report (1.6); email with D. Mannal regarding same (.2).			
09/21/23	Donghao Yan	1.10	008	852.50
	Review proposed case management order (.3); revise proposed case management order (.5); email with D. Mannal regarding same (.1); review and circulate weekly reporting (.2).			
09/21/23	James Moser	1.30	008	1,007.50
	Prepare WIP report (1.2); email with D. Mannal and H. Yan regarding same (.1).			
09/22/23	Douglas Mannal	0.30	008	495.00
	Attend Dechert WIP call (.3).			

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09/22/23	Donghao Yan	0.30	008	232.50
	Discuss outstanding administrative items with D. Mannal (.2); organize WIP call (.1).			
09/22/23	James Moser	1.60	008	1,240.00
	Update working group list (.3); prepare WIP report (1.2); email with D. Mannal and H. Yan regarding same (.1).			
09/23/23	Douglas Mannal	0.60	008	990.00
	Prepare for conference call with Dechert team regarding case status and strategy (.3); attend conference call with Dechert team regarding case status and strategy (.3).			
09/23/23	Donghao Yan	0.30	008	232.50
	Attend call with Dechert team regarding case status and strategy (.3).			
09/25/23	James Moser	0.60	008	465.00
	Discuss agenda items for Committee meeting with H. Yan (.1); draft agenda (.4); reach out to Committee member for missing information (.1).			
09/26/23	Donghao Yan	0.50	008	387.50
	Revise Benitago work tracker (.5).			
09/26/23	Matthew Stone	0.30	008	147.00
	Review docket (.1); calendar updates regarding Oct. 5 hearing for Dechert team (.2).			
09/27/23	Donghao Yan	2.00	008	1,550.00
	Review and revise interim compensation and order (1.2); review conflicts installments (.5); review judge's rules on motion practice (.2); review contact list (.1).			
09/27/23	Matthew Stone	0.20	008	98.00
	Review email regarding scheduling (.1); calendar updated hearing and related objection deadline for attorneys (.1).			
09/27/23	James Moser	1.30	008	1,007.50
	Draft complete contact list for all parties in the case (1.3).			
09/28/23	Donghao Yan	0.10	008	77.50
	Circulate revisions to the interim compensation motion and order (.1).			
10/03/23	Donghao Yan	0.20	008	155.00
	Review newly filed notice of hearing (.2).			
10/06/23	Donghao Yan	1.00	008	775.00
	Discuss workstreams with D. Mannal (.2); update work-in-progress plan (.8).			
10/06/23	James Moser	0.30	008	232.50
	Revise work plan (.2); email with H. Yan regarding same (.1).			
10/17/23	Donghao Yan	0.30	008	232.50
	Review mark-up to interim compensation motion and order (.4).			

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10/18/23	Donghao Yan	1.00	008	775.00
	Update work in progress plan (.5); attend internal team meeting to discuss work in progress plan (.5).			
10/27/23	Donghao Yan	0.30	008	232.50
	Update work plan (.3).			
008 SUBTOTAL HOURS AND FEES:		22.00		18,407.00
009 – Claims Administration and Objections				
09/20/23	Douglas Mannal	0.80	009	1,320.00
	Call with Province regarding intercompany claims issues (.4); call with R. Winning of M3 regarding intercompany claims between parent and subsidiary (.4).			
09/22/23	Douglas Mannal	0.70	009	1,155.00
	Prepare for call with D. Cherif regarding CoVenture and Sellers Finance loan documents (.2); call with D. Cherif regarding CoVenture and Sellers Finance loan documents (.5).			
09/22/23	Daniel Cherif	1.50	009	1,710.00
	Review limited guaranty and other loan documents (1.3); email with D. Mannal and H. Yan regarding same (.2).			
09/22/23	Donghao Yan	0.40	009	310.00
	Email with D. Cherif regarding loan-related materials (.2); review and circulate vendor relief and intercompany reporting (.2).			
09/23/23	Daniel Cherif	5.50	009	6,270.00
	Analyze CoVenture and Sellers Finance loan documents.			
09/23/23	Donghao Yan	0.90	009	697.50
	Draft initial document requests (.9).			
09/24/23	Douglas Mannal	0.90	009	1,485.00
	Review and comment on Committee's diligence request list (.7); telephone conference and email with H. Yan regarding same (.2).			
09/24/23	Daniel Cherif	8.00	009	9,120.00
	Analyze CoVenture and Sellers Finance loan documents (4.7); summarize certain documents regarding the limited guaranty (2.8); email with H. Yan regarding same (.5).			
09/24/23	Donghao Yan	1.10	009	852.50
	Circulate updated diligence items (.1); circulate diligence list with Debtors' counsel and organize call regarding the same (.1); review amendment to loan agreement (.2); review loan documents received from the Debtors (.7).			
09/25/23	Douglas Mannal	2.20	009	3,630.00
	Review guarantee provisions in CoVenture loan agreement (.4); conduct research regarding guarantee obligation issues (.9); call with D. Cherif and H. Yan regarding same (.5); conduct research regarding 11 USC 552 (.4).			

VALUES ON THIS INVOICE ARE BILLED IN USD

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
09/25/23	Daniel Cherif	3.00	009	3,420.00
	Analyze CoVenture and Sellers Finance loan documents (2.3); email with H. Yan regarding same (.2); call with D. Mannal and H. Yan regarding same (.5).			
09/25/23	Donghao Yan	0.90	009	697.50
	Review documents produced by Debtors' counsel to identify missing documents (.2); compile list of documents to request (.2); attend call with D. Mannal and D. Cherif to discuss loan documents review (.5).			
09/26/23	Douglas Mannal	1.40	009	2,310.00
	Research regarding potential guarantee claim (.3); review CoVenture loan documents regarding collateral package (1.1).			
09/26/23	Daniel Cherif	0.10	009	114.00
	Email with H. Yan regarding Committee update on loan document.			
09/26/23	Donghao Yan	0.50	009	387.50
	Prepare request for additional documents from Debtors' counsel (.3); coordinate obtaining access to data room (.2).			
09/27/23	Daniel Cherif	0.30	009	342.00
	Call with H. Yan regarding loan documents (.2); email with H. Yan regarding same (.1).			
09/27/23	Donghao Yan	0.20	009	155.00
	Discussion with D. Cherif regarding loan documents (.2).			
10/01/23	Donghao Yan	0.10	009	77.50
	Follow up with Debtors' counsel regarding diligence request (.1).			
10/13/23	Donghao Yan	1.20	009	930.00
	Discuss information related to claims with Committee member (.6); draft answer to unsecured creditor's inquiry regarding claim administration (.3); discuss unsecured creditor's inquiry with D. Mannal (.1); review docket entries on extension of deadline to file schedules (.2).			
10/13/23	Matthew Stone	0.20	009	98.00
	Review notice of presentment regarding schedules (.1); email with H. Yan regarding same (.1).			
10/19/23	Donghao Yan	0.30	009	232.50
	Arrange call to discuss claims with the Debtors' counsel (.3).			
10/20/23	Donghao Yan	4.50	009	3,487.50
	Analyze Debtors' draft of bar date application (.8); analyze Debtors' draft of bar date order (.7); review precedent regarding same (1.4); revise bar date order (.9); analyze Debtors' draft bar date notice (.7).			
10/21/23	Donghao Yan	0.60	009	465.00
	Email with Debtors' counsel regarding revised bar date notice (.2); finalize comments to the bar date order (.4).			
10/23/23	Donghao Yan	0.80	009	620.00
	Review bar date notice (.6); revise bar date notice (.2).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/24/23	Donghao Yan	0.30	009	232.50
	Email with creditor regarding bar date application (.1); review order to extend time to file schedules (.1); email with financial advisor regarding the same (.1).			
10/29/23	Donghao Yan	0.10	009	77.50
	Circulate schedules and statement of financial affairs with unsecured creditor (.1).			
10/31/23	Donghao Yan	0.20	009	155.00
	Review revised bar date order and notice (.2).			
009 SUBTOTAL HOURS AND FEES:		36.70		40,351.50

013 – Hearings

09/20/23	Matthew Stone	0.40	013	196.00
	Arrange attorney appearances regarding second day hearing (.2); email with H. Yan regarding same (.1); calendar second day hearing (.1).			
09/21/23	Douglas Mannal	2.00	013	3,300.00
	Prepare for second day hearing (.8); attend second day hearing (.9); follow up with Togut firm regarding orders (.1); attention to same (.1); call with Committee member regarding hearing (.1).			
09/21/23	Donghao Yan	0.90	013	697.50
	Attend second day hearing (.9).			
09/21/23	Matthew Stone	0.60	013	294.00
	Calendar hearing dates and objection deadlines for D. Mannal and H. Yan (.5); email with H. Yan regarding same (.1).			
09/27/23	Douglas Mannal	0.20	013	330.00
	Call with H. Yan regarding hearing schedules.			
09/27/23	Donghao Yan	0.20	013	155.00
	Call with D. Mannal regarding revised hearing date (.2).			
10/02/23	Matthew Stone	0.30	013	147.00
	Register D. Mannal and D. Herman for Oct. 5 hearing (.2); email with D. Mannal and D. Herman regarding same (.1).			
10/04/23	Donghao Yan	0.30	013	232.50
	Discuss October 5 hearing preparation with D. Mannal (.1); email with B. Stone regarding same (.1); review agenda for October 5 hearing (.1).			
10/04/23	Matthew Stone	1.50	013	735.00
	Email with Chambers regarding proposed order and Chambers copies (.3); email with S. Wolpert regarding same (.1); call with Chambers regarding same (.1); call with D. Mannal regarding same (.1); prepare Oct. 5 hearing binder for D. Mannal (.6); email with H. Yan regarding same (.1); review protocols regarding Oct. 5 hearing (.1); email with S. Wolpert and H. Yan regarding same (.1).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/05/23	Douglas Mannel	2.40	013	3,960.00
	Prepare for hearing on second interim cash management order (1.3); attend hearing on second interim cash management order (1.1).			
10/05/23	Donghao Yan	4.50	013	3,487.50
	Prepare for October 5 hearing by reviewing the Debtors' revised cash management order and accompanying redline (.9); prepare for October 5 hearing by reviewing the motion on the agenda and objections filed (.8); discuss hearing with D. Mannel (.2); attend hearing remotely (1.1); attend hearing recap with D. Mannel and S. Wolpert (.2); draft summary of hearing to update the Committee (1.3).			
10/05/23	Stephen Wolpert	2.10	013	2,467.50
	Email correspondence with D. Mannel regarding hearing (.4); prepare for and attend hearing (1.2); call with D. Mannel, H. Yan regarding same (.3); call with K. Ortiz regarding same (.2).			
10/05/23	Matthew Stone	0.30	013	147.00
	Email with H. Yan regarding hearing protocols (.1); email with S. Wolpert regarding same (.1); update attorney calendar regarding Oct. 19 hearing (.1).			
10/06/23	Donghao Yan	0.10	013	77.50
	Email with B. Stone regarding Oct. 5 hearing transcript (.1).			
10/06/23	Matthew Stone	0.20	013	98.00
	Email with court reporter regarding Oct. 5 hearing transcript (.1); email with H. Yan regarding same (.1).			
10/09/23	Matthew Stone	0.30	013	147.00
	Email with court reporter regarding Oct. 5 hearing transcript (.1); call with court reporter regarding same (.1); email with D. Mannel and S. Wolpert regarding same (.1).			
10/18/23	Douglas Mannel	0.50	013	825.00
	Meet with H. Yan and S. Wolpert regarding presentation to Court at Oct. 19 hearing (.5).			
10/19/23	Douglas Mannel	2.20	013	3,630.00
	Prepare for Oct. 19 hearing (.4); attend Oct. 19 hearing (1.8).			
10/19/23	Donghao Yan	2.10	013	1,627.50
	Review agenda and motions on the agenda for the hearing (.3); prepare for hearing appearance (.2); attend omnibus hearing (.5); organize notes of hearing (.3); draft Committee update on hearing (.6); review Committee update on hearing (.2).			
10/26/23	Matthew Stone	0.20	013	98.00
	Register attorneys for Oct. 30 hearing.			
10/27/23	Donghao Yan	0.70	013	542.50
	Review omnibus hearing transcript (.4); prepare binder for October 30 hearing (.3).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/27/23	Matthew Stone	0.60	013	294.00
	Prepare Oct. 30 hearing binder for D. Mannal (.5); email with H. Yan regarding same (.1).			
10/30/23	Donghao Yan	3.10	013	2,402.50
	Review filings on the agenda for the omnibus hearing (1.1); prepare for presentation at the hearing (.7); discuss hearing with D. Mannal and S. Wolpert (.3); attend omnibus hearing (.8); summarize hearing notes (.2).			
10/30/23	Stephen Wolpert	3.50	013	4,112.50
	Call with H. Yan and D. Mannal regarding preparation for hearing on cash collateral and cash management (.5); review documents in preparation for hearing (.8); draft script for hearing (.5); attend hearing (1.3); correspondence with D. Mannal, H. Yan regarding hearing and next steps (.2); correspondence with Togut regarding hearing issues (.2).			
013 SUBTOTAL HOURS AND FEES:		29.20		30,003.50
014 – Litigation				
09/21/23	Donghao Yan	0.60	014	465.00
	Review protective order against precedent (.5); discuss protective order with D. Herman (.1).			
09/22/23	Donghao Yan	1.00	014	775.00
	Review confidentiality agreement and protective order (1.0).			
09/24/23	Douglas Mannal	0.60	014	990.00
	Review and comment on protective order (.6).			
09/25/23	Donghao Yan	0.20	014	155.00
	Review revised confidentiality agreement and protective order (.2).			
09/26/23	Douglas Mannal	0.40	014	660.00
	Review and comment on protective order (.4).			
09/26/23	Donghao Yan	1.60	014	1,240.00
	Review and summarize relevant provisions in protective orders entered in similar cases (1.6).			
09/28/23	Donghao Yan	0.20	014	155.00
	Review revised confidentiality agreement and protective order (.2).			
10/03/23	David Herman	0.30	014	382.50
	Review and comment on protective order.			
10/03/23	Donghao Yan	0.30	014	232.50
	Review final version of protective order (.3).			
014 SUBTOTAL HOURS AND FEES:		5.20		5,055.00

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
015 – Investigation				
09/23/23	Donghao Yan	0.20	015	155.00
	Review Province's initial diligence list (.2).			
09/28/23	Douglas Mannal	0.30	015	495.00
	Meeting with D. Cherif and H. Yan regarding lien issues (.3).			
09/28/23	Daniel Cherif	0.70	015	798.00
	Email with H. Yan and D. Mannal regarding loan agreement and collateral documents (.4); attend meeting regarding liens with D. Mannal and H. Yan (.3).			
09/28/23	Donghao Yan	2.10	015	1,627.50
	Research case law related to lien issues (1.2); discuss diligence request with Debtors' counsel (.2); review data room (.3); request additional diligence from Debtors' financial advisor (.1); meet with D. Mannal and D. Cherif regarding lien issues (.3).			
10/02/23	Daniel Cherif	0.40	015	456.00
	Email email with H. Yan regarding lien searches and related document availability.			
10/06/23	Daniel Cherif	0.60	015	684.00
	Email with H. Yan regarding lien searches (.3); email with K. Lloyd regarding same (.3).			
10/06/23	Donghao Yan	1.00	015	775.00
	Email with D. Cheif and K. Lloyd regarding lien searches (.3); compile Debtors' information for lien searches (.6); revise list of Debtors (.1).			
10/09/23	Daniel Cherif	0.20	015	228.00
	Email with H. Yan regarding lien search, estimates (.1); email with K. Lloyd regarding same (.1).			
10/09/23	Donghao Yan	0.20	015	155.00
	Review estimated quote for lien searches (.1); coordinate revising requests for lien searches (.1).			
10/09/23	Kimberly Lloyd	1.00	015	435.00
	E-mail with Dechert team regarding UCC and lien search estimate (.2); request estimate from CT Corp. (.2); review estimate (.2); e-mail with Dechert team regarding same (.1) e-mail with service company related to fees (.1); obtain additional estimate (.2).			
10/10/23	Daniel Cherif	0.10	015	114.00
	Email with K. Lloyd regarding lien searches.			
10/10/23	Kimberly Lloyd	1.10	015	478.50
	E-mail with Dechert team regarding UCC and lien search estimates (.3); review lien search results (.6); e-mail United Corporate to obtain additional search estimate (.2).			
10/13/23	Daniel Cherif	0.20	015	228.00
	Email with D. Mannal regarding lien searches.			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/13/23	Kimberly Lloyd	0.40	015	174.00
	Follow-up UCC and lien search results (.3); email with D. Cherif regarding same (.1).			
10/18/23	Daniel Cherif	0.10	015	114.00
	Email with K. Lloyd regarding lien search summary chart.			
10/18/23	Kimberly Lloyd	0.60	015	261.00
	E-mail with working group and service company related to UCC and lien search summary (.2); review lien search summary (.4).			
10/19/23	Daniel Cherif	0.40	015	456.00
	Analyze lien search summary chart.			
10/19/23	Kimberly Lloyd	2.40	015	1,044.00
	Review UCC and lien search results (1.2); prepare summary regarding same (1.0); email with Dechert team regarding same (.2).			
10/27/23	Daniel Cherif	0.10	015	114.00
	Email with H. Yan regarding lien search results.			
10/30/23	Daniel Cherif	0.10	015	114.00
	Email with H. Yan regarding lien searches.			
10/31/23	Daniel Cherif	2.00	015	2,280.00
	Prepare analysis of lien and other search results (1.4); call with D. Mannal and H. Yan regarding same (.3); email with H. Yan and D. Mannal regarding same (.3).			
015 SUBTOTAL HOURS AND FEES:		14.20		11,186.00

016 – Plan/Disclosure Statement/Confirmation

10/10/23	Douglas Mannal	0.30	016	495.00
	Email and call with K. Ortiz of Togut regarding plan term sheet (.3).			
10/13/23	Donghao Yan	0.50	016	387.50
	Review plan term sheet (.5).			
10/13/23	Stephen Wolpert	0.80	016	940.00
	Review and analyze plan term sheet (.4); call with Togut regarding same, status (.4).			
10/19/23	Douglas Mannal	0.40	016	660.00
	Call with Greenberg Traurig regarding status of negotiations on plan and coordination going forward (.4).			
10/25/23	Douglas Mannal	0.20	016	330.00
	Call with Togut regarding chapter 11 plan and potential settlement.			
016 SUBTOTAL HOURS AND FEES:		2.20		2,812.50

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
019 – Committee				
09/20/23	Douglas Mannal	1.40	019	2,310.00
	Draft Committee update email (1.2); coordinate with H. Yan regarding same (.2).			
09/20/23	Donghao Yan	1.00	019	775.00
	Draft cover email to Committee members summarizing motions (.6); email revised proposed orders to Committee members (.2); email with Committee regarding financial advisor materials (.1); draft meeting agenda for September 21, 2023 Committee meeting (.1).			
09/21/23	Donghao Yan	2.50	019	1,937.50
	Review Committee member's summary of claims (.2); discuss bylaws with D. Herman (.1); email with D. Mannal and D. Herman regarding relevant materials (.1); review precedent regarding Committee bylaws (.6); draft Committee bylaws (1.5).			
09/21/23	James Moser	0.30	019	232.50
	Confer with D. Mannal regarding Committee communications (.3).			
09/22/23	Douglas Mannal	0.50	019	825.00
	Call with Committee member regarding certain claims and case strategy (.5).			
09/22/23	Donghao Yan	4.20	019	3,255.00
	Review Committee member's summary of claims (.3); follow up with Committee member regarding same (.1); review precedent regarding Rule 2019 statement (.3); draft Rule 2019 statement (1.1); review precedent regarding 1102 motion (.4); draft 1102 motion (1.4); finalize Committee bylaws (.6).			
09/24/23	Douglas Mannal	3.00	019	4,950.00
	Review and comments to By-laws (1.3); email with H. Yan regarding same (.2); review and comment on Rule 2019 statement (.9); review and comment on 1102 motion (.6).			
09/24/23	Donghao Yan	1.10	019	852.50
	Revise Rule 2019 statement (.3); revise 1102 motion (.6); draft email to Debtors' counsel regarding information sharing procedures (.2).			
09/25/23	Douglas Mannal	2.30	019	3,795.00
	Revise Committee by-laws (1.7); email with H. Yan regarding same (.2); revise Committee meeting agenda (.4).			
09/25/23	Donghao Yan	1.90	019	1,472.50
	Review meeting agenda (.1); circulate agenda to Committee professionals (.1); follow up with Committee member for information (.1); revise Committee by-laws (1.4); email with Committee regarding administrative documents and agenda (.2).			
09/26/23	Douglas Mannal	1.60	019	2,640.00
	Prepare for Committee meeting (.6); attend Committee meeting (.8); follow-up with Province regarding same (.2).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
09/26/23	Donghao Yan	1.30	019	1,007.50
	Prepare for weekly Committee meeting (.2); attend weekly Committee meeting (.8); review list of aggregators provided by Committee member (.1); contact Committee member regarding rule 2019 information (.2).			
09/29/23	Donghao Yan	0.30	019	232.50
	Request approval of the Committee by-laws from the members (.3).			
10/01/23	Donghao Yan	0.40	019	310.00
	Draft Committee update email (.4).			
10/02/23	Douglas Mannal	1.40	019	2,310.00
	Revise update email to Committee (1.3); email with Province regarding same (.1).			
10/02/23	Donghao Yan	1.10	019	852.50
	Revise Committee update (.3); discuss Committee update with D. Mannal (.5); email with Committee members regarding by-laws (.2); email with Committee regarding case update (.1).			
10/03/23	Douglas Mannal	1.20	019	1,980.00
	Prepare for conference call with Committee regarding financial update and cash management (.3); attend conference call with Committee regarding financial update and cash management (.9).			
10/03/23	Donghao Yan	0.90	019	697.50
	Attend Committee meeting (.7); draft and circulate Committee update (.2).			
10/05/23	Donghao Yan	0.70	019	542.50
	Review comments to the 1102 motion received from Debtors' counsel (.3); email with claims agent regarding Committee website (.4).			
10/06/23	Douglas Mannal	0.70	019	1,155.00
	Revise update email to Committee regarding hearing summary (.4); email with H. Yan regarding same (.1); email with Committee member regarding participation (.2).			
10/06/23	Donghao Yan	0.90	019	697.50
	Revise summary of hearing for Committee update (.6); email with Committee regarding same (.1); email with claims agent regarding requirements for Committee website (.2).			
10/09/23	Donghao Yan	1.20	019	930.00
	Review and finalize Committee website (.2); email with Debtors' counsel regarding pending order (.1); prepare agenda for Committee meeting (.3); revise Committee website (.1); follow up with Committee members to solicit executed by-laws (.1); coordinate call with Committee member (.1); review financial advisor's presentation for Committee meeting (.2); finalize and circulate Committee meeting agenda (.1).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/10/23	Douglas Mannal	1.50	019	2,475.00
	Prepare for Committee meeting regarding updated financial status (.4); attend Committee meeting regarding updated financial status issues (.4); call with Committee member regarding claim and Committee participation (.2); email with Committee member regarding same (.4); review 1102 motion and Committee website (.3).			
10/10/23	Donghao Yan	5.20	019	4,030.00
	Draft email responses to financial advisor's questions regarding various open legal and case administration issues (1.2); attend Committee meeting (.4); discuss follow-up items with financial advisor (.2); discuss case updates, claim information and Committee obligations with Committee member (.4); review contract and invoices provided by Committee member (.3); review employment agreements in connection with Committee member's question (.3); email with Debtors' counsel and Committee member to coordinate discussion of Committee member's claim (.2); prepare certificate of service (.9); draft notice of hearing for 1102 motion (.8); finalize 1102 motion (.8); revise 2019 statement (.9).			
10/10/23	Matthew Stone	0.20	019	98.00
	Review certificate of service regarding limited objection (.1); email with H. Yan regarding same (.1).			
10/11/23	Donghao Yan	0.80	019	620.00
	Coordinate call with Committee member (.1); revise 1102 motion (.4); investigate and draft answer to question regarding claims submitted by unsecured creditor (.3).			
10/11/23	Matthew Stone	0.80	019	392.00
	Assist in preparation of 1102 motion (.1); call with Chambers regarding hearing date for same (.1); file 1102 motion with bankruptcy court (.2); email with H. Yan regarding certificate of service for 1102 motion (.1); file certificate of service regarding same with bankruptcy court (.2); calendar hearing date and objection deadline regarding same for Dechert team (.1).			
10/12/23	Douglas Mannal	0.20	019	330.00
	Revise update email to UCC (.2).			
10/12/23	Donghao Yan	0.50	019	387.50
	Draft Committee update on changes to employee compensation (.2); review update on the company's changes to employee compensation (.2); coordinate revision of Committee website (.1).			
10/12/23	Matthew Stone	0.10	019	49.00
	Calendar objection deadline regarding 1102 Motion for Dechert team.			
10/13/23	Douglas Mannal	0.90	019	1,485.00
	Prepare for call with CalMyotis regarding unsecured claim (.2); attend call with CalMyotis regarding unsecured claim (.5); revise update email to Committee regarding cash collateral and cash management orders (.2).			
10/13/23	Donghao Yan	0.50	019	387.50
	Draft Committee update (.5).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/16/23	Douglas Mannal	0.50	019	825.00
	Prepare for Committee call (.2); revise agenda regarding same (.1); email with Province regarding same (.2).			
10/16/23	Donghao Yan	0.30	019	232.50
	Draft agenda for Committee meeting (.2); revise and circulate agenda for Committee meeting (.1).			
10/17/23	Douglas Mannal	0.90	019	1,485.00
	Prepare for weekly Committee call (.4); attend weekly Committee call (.5).			
10/17/23	Donghao Yan	2.80	019	2,170.00
	Attend Committee meeting (.5); review prior Committee update on ordinary course professionals motion and order (.2); review mark-up to case management procedures motion and order (.3); draft Committee update on uncontested motions (.9); discuss Committee update with D. Mannal (.3); revise Committee update on uncontested motions (.4); circulate Committee update (.1).			
10/18/23	Donghao Yan	0.40	019	310.00
	Follow up with Committee member regarding claim (.3); coordinate call between Committee member and the Debtors' professional (.1).			
10/19/23	Douglas Mannal	0.20	019	330.00
	Email with H. Yan regarding Committee update email (.2).			
10/20/23	Donghao Yan	0.40	019	310.00
	Revise Committee update (.3); email with Committee regarding same (.1).			
10/23/23	Donghao Yan	1.00	019	775.00
	Draft Committee update (.8); finalize and circulate Committee update (.2).			
10/24/23	Donghao Yan	1.80	019	1,395.00
	Draft certificate of no objection for 1102 motion (1.0); email with Committee member regarding resignation (.2); update the U.S. Trustee and the Committee regarding Committee member's resignation (.2); update Rule 2019 statement (.4).			
10/25/23	Donghao Yan	0.80	019	620.00
	Finalize certificate of no objection (.2); circulate the update regarding Committee membership with Debtors' counsel (.1); draft and circulate update email to Committee regarding the company's proposed new hires (.3); draft and circulate update email to Committee regarding new bar date (.1); email with Debtors' counsel regarding no objection from the Committee regarding new hires (.1).			
10/26/23	Matthew Stone	0.70	019	343.00
	Assist in preparation of Certificate of No Objection regarding 1102 motion (.2); file certificate with bankruptcy court (.2); email with Chambers regarding proposed order to 1102 motion (.3).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
10/27/23	Donghao Yan	1.40	019	1,085.00
	Draft email response to Committee member's inquiry regarding bar date (.4); draft Committee update email (.6); review notice of 341 meeting (.2); email with Debtors' counsel regarding 341 meeting (.2); prepare certificate of service (.1); revise and circulate Committee update (.1).			
10/29/23	Donghao Yan	0.50	019	387.50
	Draft meeting agenda for Committee meeting (.2).			
10/30/23	Douglas Mannal	0.70	019	1,155.00
	Prepare for weekly Committee call.			
10/30/23	Donghao Yan	0.90	019	697.50
	Update Committee meeting agenda (.2); review financial advisor's presentation (.2); discuss presentation with financial advisor (.3); draft and circulate Committee update (.2).			
10/30/23	Matthew Stone	0.10	019	49.00
	Email with H. Yan regarding proposed order for 1102 motion.			
10/31/23	Douglas Mannal	1.30	019	2,145.00
	Prepare for and attend weekly Committee call.			
10/31/23	Donghao Yan	1.20	019	930.00
	Review Committee member's questions regarding operational item (.1); attend Committee hearing (.8); coordinate filing of certificate of service (.1); update Committee website (.2).			
10/31/23	Matthew Stone	0.40	019	196.00
	Review 2019 statement (.1); email with H. Yan regarding same (.1); file 2019 statement with bankruptcy court (.2).			
019 SUBTOTAL HOURS AND FEES:		56.90		59,454.50
TOTAL HOURS AND FEES		398.20		USD 423,075.00

VALUES ON THIS INVOICE ARE BILLED IN USD

<u>TIMEKEEPER SUMMARY:</u>				
<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
D. Manna	Partner	1,650.00	106.50	175,725.00
D. Herman	Partner	1,275.00	0.30	382.50
D. Cherif	Associate	1,140.00	23.30	26,562.00
O. Haney	Associate	875.00	2.80	2,450.00
D. Yan	Associate	775.00	163.20	126,480.00
S. Wolpert	Counsel	1,175.00	53.50	62,862.50
M. Stone	Legal Assistant	490.00	25.20	12,348.00
K. Lloyd	Legal Assistant	435.00	5.50	2,392.50
J. Moser	Law Clerk	775.00	17.90	13,872.50
TOTALS			398.20	USD 423,075.00



Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036-6797
FED. ID. 23-1425587
www.dechert.com

REMITTANCE AND PAYMENT INSTRUCTIONS

For questions about payment instructions please call (215) 994-4000.

Official Committee of Unsecured Creditors of Benitago Inc.
1 Liberty St
Suite 320
New York, NY 10006

November 3, 2023
Invoice Number 0

Firm Client Matter Number: 408863.204884

Matter Name: Benitago Inc., et al.

Professional Services Rendered Through October 31, 2023

VALUES ON THIS INVOICE ARE BILLED IN USD

TOTAL AMOUNT DUE FOR THIS INVOICE USD 423,266.76

REMITTANCE INSTRUCTIONS

For questions about payment instruction please call (215) 994-4000

Payment by Wire or ACH

Bank Name: Citi Private Bank
Bank Address: 153 East 53rd St., New York, NY
Account Name: Dechert LLP Main Account
Account #: 759527772 | ABA #: 021272655 | Swift Code: CITIUS33

Payment by Check (U.S. Only)

Please include this remittance or print the invoice number (0) in the check memo. Mail to:
Dechert LLP | P.O. Box 7247-6643 Philadelphia, PA | 19170-6643

EXHIBIT B

Expenses

DISBURSEMENTS:

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Taxi Fare	
Vendor: Douglas Mannal; Invoice#: 101823-423900; Date: 10/18/2023 - DM - 10.16 Uber - Taxi -	191.76
	<hr/>
	191.76
TOTAL DISBURSEMENTS	<hr/>
	USD 191.76
