

**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 28, 2023 at 5:00 p.m. ET

**SECOND MONTHLY FEE STATEMENT 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
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 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:	November 1, 2023 through November 30, 2023
Amount of compensation sought as actual, reasonable, and necessary:	\$179,528.50²
Eighty percent of actual, reasonable and necessary compensation:	\$143,662.80
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$9,731.86

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

Is this the first monthly statement? 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 \$1,575.00.

This application includes 40.2 hours with a value of \$21,579.00 incurred in connection with the preparation of Fee Statements.

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	2.60	3,315.00
Douglas Mannal	Partner	2001	1,650.00	26.40	43,560.00
Gary J. Mennitt	Partner	1991	1,600.00	0.60	960.00
Bishoy Eskander	Counsel	2010	1,105.00	2.60	2,873.00
Stephen M. Wolpert	Counsel	2007	1,175.00	4.00	4,700.00
Pat Andriola	Associate	2016	1,140.00	16.90	19,266.00
Daniel Cherif	Associate	2014	1,140.00	3.30	3,762.00
James S. Moser	Associate	2023	775.00	0.80	620.00
Donghao Yan	Associate	2023	775.00	101.10	78,352.50
Matthew B. Stone	Legal Assistant	N/A	490.00	43.00	21,070.00
Elisabeth L. Sachse	eDiscovery Specialist	N/A	525.00	2.00	1,050.00
Total				203.30	\$179,528.50
Total Amount Requested Herein					\$143,662.80

The blended hourly billing rate of professionals for all services provided during the Fee Period is \$883.07.

Compensation by Project Category

Code	Project Category	Total Hours	Total Fees
001	Retention and Fee Applications	47.20	26,719.00
002	DIP/Cash Collateral/Cash Management	6.00	4,588.00
006	Use, Sale, and Lease of Property	10.80	9,670.00
007	Business Operations and Governance	1.20	930.00
008	Case Administration	4.80	3,601.50
009	Claims Administration and Objections	0.80	620.00
013	Hearings	2.20	2,934.00
014	Litigation	51.00	46,537.50
015	Investigation	6.90	7,410.00
016	Plan/Disclosure Statement/Confirmation	51.80	54,148.50
019	Committee	20.60	22,370.00
Total		203.30	\$179,528.50

Expense Summary

Expenses Category	Total Expenses
Document Storage/Retrieval	249.30
Filing Fees and Related	9,046.00
Westlaw Search Fees	436.56
Total	\$9,731.86

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Debtors.)	Jointly Administered
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OF UNSECURED CREDITORS FOR THE PERIOD FROM
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

By this monthly fee statement (the “**Statement**”), 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 **\$143,662.80** together with reimbursement for actual and necessary expenses incurred in the amount of **\$9,731.86**, for the period commencing November 1, 2023 through and including November 30, 2023 (the “**Fee Period**”). In support of the Statement, 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 \$179,528.50,² of which \$143,662.80 is requested for fees in this Statement. **Exhibit B** is a detailed statement of expenses paid during the Fee Period showing the amount of \$9,731.86 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 \$9,731.86. 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 \$1,575.00.

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 203.3 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 \$179,528.50, of which \$143,662.80 is requested for fees in this Statement.

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 Statement covers the period of November 1, 2023 through and including November 30, 2023 with respect to the Committee. Dechert has and will continue to perform additional necessary services for the Committee subsequent to November 30, 2023, for which Dechert will file subsequent fee statements.

Dated: December 13, 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*

**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 Statement 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: December 13, 2023

Respectfully submitted,

/s/ Douglas Mannal _____

Douglas Mannal
DECHERT LLP
1095 Avenue of the Americas
New York, New York 10036
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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

December 13, 2023
Invoice Number 1010124406

Firm Client Matter Number: 408863.204884

Matter Name: Benitago Inc., et al.

Professional Services Rendered Through November 30, 2023

VALUES ON THIS INVOICE ARE BILLED IN USD

TOTAL FEES FOR THIS INVOICE 179,528.50

TOTAL DISBURSEMENTS FOR THIS INVOICE 9,731.86

TOTAL AMOUNT DUE FOR THIS INVOICE USD 189,260.36

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				
11/01/23	Matthew Stone	1.50	001	735.00
	Assist in preparation of September fee statement regarding privilege and confidentiality.			
11/03/23	Matthew Stone	1.90	001	931.00
	Assist in preparation of September fee statement regarding privilege and confidentiality (1.7); email with D. Mannel regarding combined September/October fee statement (.2).			
11/04/23	Matthew Stone	2.90	001	1,421.00
	Assist in preparation of October fee statement regarding privilege and confidentiality (2.9).			
11/05/23	Matthew Stone	4.70	001	2,303.00
	Assist in preparation of October fee statement regarding privilege and confidentiality (4.5); email correspondence with H. Yan regarding same (.2).			
11/06/23	Donghao Yan	2.40	001	1,860.00
	Discuss fee statements with B. Stone (0.3); review professionals fees budget (0.2); provide comments to fee statements (1.8); email Debtors' counsel regarding Portage Point's retention application (0.1).			
11/06/23	Matthew Stone	3.00	001	1,470.00
	Assist in preparation of October fee statement regarding privilege and confidentiality (2.5); email with H. Yan regarding same (.1); call with H. Yan regarding same (.3); email with H. Yan regarding budget (.1).			
11/07/23	Matthew Stone	0.50	001	245.00
	Assist in preparation of October fee statement regarding privilege and confidentiality (.4); email with H. Yan regarding same (.1).			
11/08/23	Donghao Yan	1.60	001	1,240.00
	Review Portage's retention applications and supporting documents (1.2); summarize key terms of the same (0.4).			
11/08/23	Matthew Stone	2.70	001	1,323.00
	Revise September fee statement regarding privilege and confidentiality (.8); revise October fee statement regarding privilege and confidentiality (1.8); email with H. Yan regarding same (.1).			
11/09/23	Donghao Yan	1.60	001	1,240.00
	Revise September fee statement regarding privilege and confidentiality (.5); revise October fee statement regarding privilege and confidentiality (.9); email with B. Stone regarding same (.2).			
11/09/23	Donghao Yan	0.10	001	77.50
	Email B. Stone regarding retention orders (0.1).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/10/23	Matthew Stone	0.70	001	343.00
	Assist in preparation of September fee statement regarding privilege and confidentiality (.2); assist in preparation of October fee statement regarding privilege and confidentiality (.3); email with D. Mannal regarding same (.1); email with H. Yan regarding same (.1).			
11/13/23	Donghao Yan	0.80	001	620.00
	Review Portage Point retention application (0.2); call with Province regarding same (0.2); coordinate entry of proposed orders of Dechert and Province retention applications (0.3); email with Debtors' counsel regarding entry of retention applications (0.1).			
11/13/23	Matthew Stone	0.80	001	392.00
	Email with D. Mannal regarding first monthly fee statement (.1); draft email to Chambers regarding proposed orders for Dechert and Province retention applications (.5); email with H. Yan regarding same (.1); email with Chambers regarding same (.1).			
11/14/23	Matthew Stone	4.30	001	2,107.00
	Draft Dechert first monthly fee statement (2.5); email with I. Campos regarding same (.1); call with I. Campos regarding same (.1); further draft Dechert first monthly fee statement (1.6).			
11/15/23	Donghao Yan	0.90	001	697.50
	Revise Dechert monthly fee statement (0.9).			
11/15/23	Donghao Yan	0.20	001	155.00
	Email B. Stone regarding entry of certificate of no objection and retention applications (0.1); email D. Mannal regarding entry of retention applications (0.1).			
11/15/23	Matthew Stone	0.70	001	343.00
	Revise Dechert first monthly fee statement (.6); email with H. Yan regarding same (.1).			
11/16/23	Matthew Stone	0.10	001	49.00
	Email with D. Mannal regarding Dechert first monthly fee statement.			
11/20/23	Matthew Stone	1.90	001	931.00
	Email with D. Mannal regarding retention order (.1); email with Chambers regarding Dechert and Province retention orders (.2); assist in preparation of November fee statement regarding privilege and confidentiality (1.6).			
11/21/23	Matthew Stone	1.40	001	686.00
	Assist in preparation of November fee statement regarding privilege and confidentiality (1.4).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/22/23	Donghao Yan	2.20	001	1,705.00
	Discuss Portage retention application with Debtors' counsel (0.3); email with Province regarding Portage's retention application (0.3); call with Province regarding Portage retention application (0.1); email with B. Stone regarding comments to Dechert's first fee statement (0.1); email D. Mannal regarding Dechert and Province's fee statements (0.1); revise Province first fee statement (0.9); email with Province regarding same (0.1); email with Committee regarding same (0.1); review relevant authority on service of fee statements (0.2).			
11/22/23	Matthew Stone	1.50	001	735.00
	Call with H. Yan regarding Dechert first fee statement (.1); revise Dechert fee statement (.2); email with D. Mannal regarding same (.1); assist in preparation of November fee statement regarding privilege and confidentiality (1.1).			
11/24/23	Donghao Yan	0.70	001	542.50
	Review U.S. Trustee guidelines on fee statements (0.2); email with B. Stone regarding same (0.2); email with Province regarding Province's fee statement (0.1); call with Province regarding Portage retention application (0.2).			
11/24/23	Matthew Stone	2.00	001	980.00
	Revise Dechert fee statement (.4); email with H. Yan regarding same (.1); review U.S. Trustee guidelines regarding Province fee statement (.3); revise Province fee statement (.7); email with H. Yan regarding same (.1); file Dechert fee statement (.2); serve same (.2).			
11/25/23	Donghao Yan	0.30	001	232.50
	Review Province's analysis of Portage's retention application (0.2); email D. Mannal regarding Portage's fee statement (0.1).			
11/26/23	Donghao Yan	0.30	001	232.50
	Review Portage's engagement letter (0.2); email D. Mannal regarding Portage's fee structure (0.1).			
11/26/23	Donghao Yan	0.20	001	155.00
	Email B. Stone regarding Province's fee statement (0.1); circulate finalized Province's fee statement (0.1).			
11/26/23	Matthew Stone	0.70	001	343.00
	Revise Province fee statement (.4); email with H. Yan regarding same (.1); calendar objection deadline regarding Dechert fee statement (.1); email with D. Mannal regarding payments for same (.1).			
11/27/23	Matthew Stone	0.50	001	245.00
	Finalize Province fee statement (.1); file same (.2); serve same (.2).			
11/28/23	Donghao Yan	1.10	001	852.50
	Review revised Portage's retention application and proposed order (0.8); email D. Mannal regarding the same (0.2); email Province regarding the same (0.1).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/28/23	Matthew Stone	2.40	001	1,176.00
	Assist in preparation of November fee statement regarding privilege and confidentiality.			
11/29/23	Donghao Yan	0.20	001	155.00
	Discuss docketing of fee statement with B. Stone (0.1); discuss docketing of fee statement with D. Mannal (0.1).			
11/29/23	Matthew Stone	0.40	001	196.00
	Email with D. Mannal regarding Dechert fee statement (.1); confer with H. Yan regarding same (.1); call with Chambers regarding same (.1); call with bankruptcy court regarding same (.1).			
001 SUBTOTAL HOURS AND FEES:		47.20		26,719.00

002 – DIP/Cash Collateral/Cash Management

11/03/23	Donghao Yan	1.70	002	1,317.50
	Review final cash collateral order (0.3); review final cash management order (0.2); review costs reimbursement schedules (0.6); discuss costs reimbursement schedules with Province (0.4); email S. Wolpert regarding final cash management and cash collateral orders (0.1); email D. Mannal regarding same (0.1).			
11/03/23	Matthew Stone	0.10	002	49.00
	Calendar objection deadline regarding final cash management and cash collateral orders.			
11/06/23	Donghao Yan	0.40	002	310.00
	Email Debtors' counsel regarding final cash management and cash collateral orders (0.1); discuss final cash management and cash collateral orders on a phone call with Debtors' counsel (0.2); email D. Mannal regarding update on the final orders (0.1).			
11/07/23	Donghao Yan	0.20	002	155.00
	Discuss extension of objection deadline of final cash management and cash collateral orders with Debtors' counsel (0.1); review Debtors' email regarding the same (0.1).			
11/07/23	Matthew Stone	0.10	002	49.00
	Revise attorney calendars regarding objection deadline to final cash management and cash collateral orders.			
11/08/23	Donghao Yan	0.20	002	155.00
	Review Dechert fees for cash collateral budget (0.1); email with Province regarding cash collateral budget (0.1).			
11/10/23	Matthew Stone	0.20	002	98.00
	Review notice of adjourned hearing on cash management and cash collateral (.1); calendar same for D. Mannal and H. Yan (.1).			

VALUES ON THIS INVOICE ARE BILLED IN USD

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/14/23	Donghao Yan	1.60	002	1,240.00
	Discuss entry of motion to redact objection to cash management with B. Stone (0.2); draft certificate of no objection for the motion to redact (1.1); discuss certificate of no objection with S. Wolpert (0.1); email with D. Mannal regarding the same (0.2).			
11/14/23	Stephen Wolpert	0.30	002	352.50
	Discussion with H. Yan regarding motion to redact (.1); review draft certificate of no objection (.1); email with H. Yan regarding same (.1).			
11/14/23	Matthew Stone	0.20	002	98.00
	Call with H. Yan regarding call from Chambers regarding motion to seal.			
11/15/23	Matthew Stone	0.20	002	98.00
	Call with Chambers regarding motion to seal (.1); email with H. Yan regarding same (.1).			
11/20/23	Matthew Stone	0.40	002	196.00
	Email with H. Yan regarding call from Chambers regarding proposed order to motion to redact Committee's limited objection (.1); email with Chambers regarding same (.2); call with Chambers regarding same (.1).			
11/27/23	Stephen Wolpert	0.40	002	470.00
	Review cash collateral order for questions regarding inventory ownership (.2); correspondence with D. Mannal regarding same (.2).			
002 SUBTOTAL HOURS AND FEES:		6.00		4,588.00
006 – Use, Sale, and Lease of Property				
11/20/23	Donghao Yan	2.40	006	1,860.00
	Review the Debtors' draft motion regarding indemnity claims (1.2); review certain indemnification agreements in connection with same (0.8); email with Province regarding same (0.4).			
11/21/23	Donghao Yan	0.40	006	310.00
	Coordinate call with Debtors' counsel regarding the Debtors' draft motion regarding indemnity claims (0.1); discuss the Debtors' draft motion regarding indemnity claims with D. Mannal (0.1); email regarding letter to Debtors' counsel with D. Herman (0.2).			
11/22/23	David Herman	2.60	006	3,315.00
	Call with H. Yan regarding Debtors' draft motion (.5); review Debtors' draft motion regarding indemnity claims (1.2); review and comment on draft letter regarding same (.7); call with H. Yan regarding same (.2).			
11/22/23	Donghao Yan	4.70	006	3,642.50
	Research case law cited in the Debtors' draft motion regarding indemnity claims (1.0); draft letter to the Debtors regarding same (2.4); discuss letter to the Debtors with D. Herman (0.3); incorporate D. Herman's comments on letter to the Debtors (0.5); discuss revisions to the letter to the Debtors with D. Herman (0.2); create e-binder of cases cited in the Debtors' draft motion regarding indemnity claims (0.3).			

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11/24/23	Donghao Yan	0.70	006	542.50
	Proofread letter regarding the Debtors' draft motion regarding indemnity claims (0.3); email with Dechert team regarding same (0.1); review the Debtors' filings to prepare summary regarding same (0.2); review the Debtors' response to letter regarding their draft motion regarding indemnity claims (0.1).			
006 SUBTOTAL HOURS AND FEES:		10.80		9,670.00
007 – Business Operations and Governance				
11/01/23	Donghao Yan	0.20	007	155.00
	Review summary provided by the Debtors' counsel regarding proposed rebranding (0.2).			
11/02/23	Donghao Yan	0.70	007	542.50
	Review Committee member's comments regarding costs of business operation (0.3); email with Province regarding the same (0.2); review Province's comments regarding analysis of the costs (0.2).			
11/06/23	Donghao Yan	0.30	007	232.50
	Review variance budget (0.3).			
007 SUBTOTAL HOURS AND FEES:		1.20		930.00
008 – Case Administration				
11/03/23	Donghao Yan	0.10	008	77.50
	Draft certificate of service regarding Rule 2019 Statement.			
11/05/23	Donghao Yan	0.10	008	77.50
	Circulate work in progress plan.			
11/08/23	Donghao Yan	0.20	008	155.00
	Discuss case strategy with S. Wolpert (0.1); discuss scheduling call with Debtors' counsel with D. Mannel (0.1).			
11/10/23	Donghao Yan	0.20	008	155.00
	Review chambers rules on presentment (0.2).			
11/13/23	Donghao Yan	0.70	008	542.50
	Update work in progress plan (0.3); attend call to discuss open work streams (0.4).			
11/13/23	Matthew Stone	0.30	008	147.00
	Review omnibus hearing notice (.1); calendar omnibus hearing dates for attorneys (.2).			
11/15/23	Donghao Yan	0.40	008	310.00
	Email D. Mannel regarding entry of certificate of no objection (0.1); review docket and Committee website (0.2); coordinate updating Committee website with Stretto (0.1).			

VALUES ON THIS INVOICE ARE BILLED IN USD

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/20/23	Douglas Mannal	0.40	008	660.00
	Attend WIP call with H. Yan (0.4).			
11/20/23	Donghao Yan	0.60	008	465.00
	Update Benitago group work plan (0.2); call with D. Mannal regarding same (0.4).			
11/21/23	Matthew Stone	1.60	008	784.00
	Prepare exhibit to certificates of service regarding email and hard copy service (.9); email with H. Yan regarding same (.2); further revise service exhibits (.5).			
11/23/23	Pat Andriola	0.20	008	228.00
	Review proposed notice of appearances to be filed on docket.			
008 SUBTOTAL HOURS AND FEES:		4.80		3,601.50
009 – Claims Administration and Objections				
11/03/23	Donghao Yan	0.80	009	620.00
	Reply to unsecured creditor's inquiry regarding bar date and proof of claim (0.8).			
009 SUBTOTAL HOURS AND FEES:		0.80		620.00
013 – Hearings				
11/14/23	Matthew Stone	0.10	013	49.00
	Revise attorney calendar regarding cancellation of Nov. 16 hearing.			
11/20/23	Matthew Stone	0.20	013	98.00
	Email with H. Yan regarding hearing transcripts.			
11/29/23	Douglas Mannal	1.60	013	2,640.00
	Prepare for status conference on scheduling of DS and Plan hearings (.5); attend status conference on scheduling of DS and Plan hearings (1.1).			
11/30/23	Matthew Stone	0.30	013	147.00
	Calendar status conference protocols regarding appointment with mediator (.1); arrange attorney appearances regarding December 14 hearing (.2).			
013 SUBTOTAL HOURS AND FEES:		2.20		2,934.00
014 – Litigation				
11/20/23	Douglas Mannal	0.50	014	825.00
	Call with S. Wolpert and H. Yan regarding status of information requests and potential 2004 discovery (0.5).			
11/20/23	Donghao Yan	0.50	014	387.50
	Attend call with D. Mannal and S. Wolpert to discuss discovery issues (0.5).			

VALUES ON THIS INVOICE ARE BILLED IN USD

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/20/23	Stephen Wolpert	0.60	014	705.00
	Call with D. Mannal and H. Yan regarding status of information requests and potential 2004 discovery (.5); email with G. Mennitt regarding same (.1).			
11/21/23	Douglas Mannal	0.40	014	660.00
	Meeting with Dechert litigation team regarding rule 2004 and Motion to convert chapter 11 cases to chapter 7 (.4).			
11/21/23	Pat Andriola	2.60	014	2,964.00
	Meet with D. Mannal, S. Wolpert, G. Mennitt, and H. Yan to prepare for rule 2004 motion (0.4); review documents and pleadings to prepare to draft rule 2004 motion (2.0); confer with H. Yan regarding same (0.2).			
11/21/23	Donghao Yan	6.40	014	4,960.00
	Draft outline for rule 2004 motion (3.5); meeting with D. Mannal, S. Wolpert, G. Mennitt, and P. Andriola to discuss 2004 motion (0.4); circulate materials related to rule 2004 motion (0.2); email P. Andriola regarding notice of rule 2004 motion (0.3); discuss service of same with B. Stone (0.2); discuss document requests with Province (0.3); email Province regarding informal diligence (0.1); draft document requests (1.0); discuss draft of document requests with P. Andriola (0.1); email P. Andriola regarding definitions in the document requests (0.1); email D. Mannal regarding the Debtors' internal investigation (0.2).			
11/21/23	Stephen Wolpert	0.80	014	940.00
	Review outline of potential rule 2004 motion (.2); meeting with G. Mennitt, D. Mannal, H. Yan, and P. Andriola regarding same (.4); email with P. Andriola regarding same (.2).			
11/22/23	Pat Andriola	4.30	014	4,902.00
	Draft rule 2004 motion to conduct discovery.			
11/22/23	Donghao Yan	3.60	014	2,790.00
	Draft rule 2004 motion (2.3); email D. Cherif regarding document request on financing agreements (0.2); email B. Eskander regarding document requests (0.1); revise document request (0.2); email Province regarding informal diligence requests (0.1); review proposed mediation motion and order (0.7).			
11/23/23	Donghao Yan	1.90	014	1,472.50
	Prepare notice of appearance (0.5); email P. Andriola regarding service (0.1); revise mediation order (0.1); email D. Mannal regarding mediation order (0.1); revise document requests (0.6); email Province regarding document requests (0.2); further revise document requests (0.2); email Province regarding revised document requests (0.1).			
11/24/23	Pat Andriola	0.50	014	570.00
	Review timing rules regarding rule 2004 discovery motion (0.3); email with D. Mannal, H. Yan regarding rule 2004 discovery motion (0.2).			
11/24/23	Donghao Yan	0.80	014	620.00
	Coordinate call with the Debtors to discuss document requests (0.1); summarize required disclosures (0.4); revise document requests (0.3).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/24/23	Donghao Yan	0.20	014	155.00
	Review rules on notice period (0.1); email P. Andriola regarding notice period (0.1).			
11/25/23	Pat Andriola	0.50	014	570.00
	Revise rule 2004 motion for discovery.			
11/25/23	Donghao Yan	1.30	014	1,007.50
	Revise document requests (0.2); revise rule 2004 motion (0.7); review Province's log of informal diligence requests (0.4).			
11/26/23	Pat Andriola	0.80	014	912.00
	Review and comment on rule 2004 motion for discovery from Debtors (0.6); email with H. Yan, D. Mannal regarding same (0.2).			
11/26/23	Donghao Yan	1.40	014	1,085.00
	Revise rule 2004 motion and document requests (0.8); email D. Mannal and P. Andriola regarding new productions (0.2); further revised diligence status chart included in rule 2004 motion (0.4).			
11/27/23	Douglas Mannal	0.90	014	1,485.00
	Revise rule 2004 motion and order (.9).			
11/27/23	Pat Andriola	3.60	014	4,104.00
	Revise rule 2004 motion for discovery (2.1); call with H. Yan regarding same (.4); further revise same (1.1).			
11/27/23	Donghao Yan	3.30	014	2,557.50
	Discuss document requests with the Debtors (0.4); email P. Andriola regarding revising and filing the rule 2004 motion (0.2); discuss with P. Andriola regarding notice for the rule 2004 motion (0.4); email Province regarding the rule 2004 motion (0.2); discuss document requests and rule 2004 motion with Province (0.4); revise rule 2004 motion and document requests (1.2); incorporate Province's comments to the rule 2004 motion (0.2); email the Debtors regarding the 2004 motion (0.2); coordinate filing of the 2004 motion with B. Stone (0.2); email D. Mannal regarding presentment (0.1).			
11/27/23	Matthew Stone	2.00	014	980.00
	Assist in preparation of rule 2004 motion (1.8); email with H. Yan regarding same (.2).			
11/28/23	Gary Mennitt	0.60	014	960.00
	Analyze rule 2004 motion.			
11/28/23	Pat Andriola	2.90	014	3,306.00
	Review rule 2004 motion for discovery (1.0); prepare internal review of Debtors' document productions (1.9).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/28/23	Donghao Yan	2.60	014	2,015.00
	Revise Rule 2004 motion (0.8); email Debtors' counsel regarding Rule 2004 motion and redline (0.2); review rules on notice (0.2); email D. Mannal regarding motion to convert and notice (0.1); review case management order and protective order (0.3); draft and circulate agenda and materials for team meeting (0.2); attend team meeting (0.1); discuss drafting with P. Andriola (0.2); review finalized 2004 motion (0.3); email L. Sachse regarding document review and data room (0.1); circulate proposed order with Debtors' counsel (0.1).			
11/28/23	Matthew Stone	1.50	014	735.00
	Revise rule 2004 motion (.4); email with H. Yan regarding same (.1); file rule 2004 motion (.2); serve same via email (.3); arrange service of same via hard copy (.3); arrange service to Chambers regarding same (.2).			
11/28/23	Elisabeth Sachse	1.00	014	525.00
	Prepare and process initial datasite export (.5); compile and prepare datasite production materials for upload (.5).			
11/29/23	Donghao Yan	1.10	014	852.50
	Draft coding layout for document review (0.3); email P. Andriola and S. Wolpert regarding coding layout (0.1); review data room (0.3); email Portage Point regarding data room (0.1); discuss rule 2004 motion with D. Mannal (0.1); discuss document review with D. Mannal (0.2).			
11/29/23	Donghao Yan	0.40	014	310.00
	Email P. Andriola regarding document review (0.1); discuss document review with J. Moser (0.1); email L. Sachse regarding document review (0.2).			
11/29/23	Matthew Stone	0.50	014	245.00
	Draft certificate of service regarding rule 2004 motion (.4); email with H. Yan regarding same (.1).			
11/29/23	Elisabeth Sachse	1.00	014	525.00
	Email correspondence with Dechert team regarding review information (.3); prepare review layout (.2); prepare received productions for attorney review (.5).			
11/30/23	Pat Andriola	1.30	014	1,482.00
	Meet with H. Yan, J. Moser to discuss document review (0.4); review 2004 proposed order from debtors (0.9)			
11/30/23	James Moser	0.80	014	620.00
	Meet with P. Andriola and H. Yan regarding document production (0.6); discuss discovery further with H. Yan (0.2)			
11/30/23	Donghao Yan	0.40	014	310.00
	Email B. Stone regarding email to chambers for entry of rule 2004 motion (0.2); review revised proposed order granting Rule 2004 motion (0.2).			
014 SUBTOTAL HOURS AND FEES:		51.00		46,537.50

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
015 – Investigation				
11/07/23	Daniel Cherif	1.70	015	1,938.00
	Review IP lien search documents (1.3); call with H. Yan regarding same (.2); email with D. Mannal and H. Yan regarding same (.2).			
11/07/23	Donghao Yan	0.20	015	155.00
	Discuss IP lien search with D. Cherif.			
11/10/23	Donghao Yan	0.30	015	232.50
	Review invoice for lien searches (0.2); email with D. Mannal regarding the same (0.1).			
11/13/23	Daniel Cherif	0.20	015	228.00
	Email with H. Yan regarding lien search results.			
11/20/23	Daniel Cherif	0.60	015	684.00
	Email with H. Yan and B. Eskander regarding SellersFunding loan document collateral and related matters (.4); review emails regarding same (.2).			
11/20/23	Donghao Yan	0.50	015	387.50
	Email D. Cherif regarding non-Debtor affiliate (0.3); email D. Mannal regarding the same (0.2).			
11/21/23	Daniel Cherif	0.60	015	684.00
	Email with H. Yan regarding UK searches (.2); call with H. Yan regarding same (.2); email with B. Eksander regarding same including to facilitate language for document request (.2).			
11/21/23	Bishoy Eskander	1.50	015	1,657.50
	Conduct legal research regarding UK securities query.			
11/22/23	Daniel Cherif	0.20	015	228.00
	Email with B. Eskander and H. Yan regarding document requests.			
11/22/23	Bishoy Eskander	1.10	015	1,215.50
	Review and comment on motion language relating to English security (0.8); email with D. Cherif and H Yan regarding same (0.3).			
015 SUBTOTAL HOURS AND FEES:		6.90		7,410.00
016 – Plan/Disclosure Statement/Confirmation				
11/08/23	Donghao Yan	0.10	016	77.50
	Email with Province regarding plan term sheet (0.1).			
11/09/23	Douglas Mannal	1.20	016	1,980.00
	Prepare for and attend conference call with counsel for Benitago (.9); numerous calls/emails with H. Yan regarding same (.3).			
11/09/23	Donghao Yan	1.30	016	1,007.50
	Attend call with Debtors' counsel regarding plan term sheet and next steps in the case (0.5); discuss plan term sheet with Province (0.5); review financial update regarding plan term sheet provided by Province (0.3).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/15/23	Donghao Yan	1.10	016	852.50
	Discuss plan negotiations with Committee member (0.4); discuss CoVenture's plan with Province (0.5); discuss CoVenture's plan with D. Mannal (0.2).			
11/16/23	Donghao Yan	1.00	016	775.00
	Discuss plan issues and next steps with Province (0.5); discuss case progress and plan issues with SellersFi's counsel (0.5).			
11/17/23	Douglas Mannal	2.20	016	3,630.00
	Teleconferences with Committee members regarding claims and next steps on plan negotiations (.9); numerous emails/teleconferences with M. Dundon regarding same (.3); prepare for call with Province regarding next steps on discovery and motion to convert case from chapter 11 to chapter 7 (.3); call with Province regarding next steps on discovery and motion to convert case from chapter 11 to chapter 7 (.7).			
11/17/23	Donghao Yan	2.40	016	1,860.00
	Discuss plan proposal with Committee member (0.3); discuss the same with Province (0.5); review case law related to potential motion practice in response to plan proposal (1.6).			
11/20/23	Douglas Mannal	0.70	016	1,155.00
	Attend call with Province regarding plan proposal (.5); call with K. Ortiz regarding next steps (.2).			
11/20/23	Donghao Yan	0.90	016	697.50
	Attend call with Province to discuss plan proposal alternatives (0.5); review proposed plan (0.4).			
11/20/23	Stephen Wolpert	0.50	016	587.50
	Conference call with D. Mannal, H. Yan, Province team to discuss plan proposal.			
11/21/23	Douglas Mannal	1.10	016	1,815.00
	Prepare for call with J. Baker and Togut team regarding plan settlement constructs and next steps (.2); call with J. Baker and Togut team regarding plan settlement constructs and next steps (.9).			
11/21/23	Donghao Yan	0.20	016	155.00
	Research dockets related to motion to convert (0.2).			
11/21/23	Donghao Yan	1.40	016	1,085.00
	Review the Debtors' supplemental declarations (0.5); prepare summary regarding supplemental declarations (0.2); email Province regarding supplemental declarations (0.2); email with D. Mannal regarding counter plan proposal (0.2); email Province regarding counter plan proposal (0.1); coordinate call with Province to discuss counter plan proposal (0.2).			
11/21/23	Donghao Yan	0.80	016	620.00
	Review revised master service list (0.2); attend call with the Debtors' counsel and independent director (0.4); review Province's analysis regarding brands and unsecured claims (0.2).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/22/23	Douglas Mannal	1.20	016	1,980.00
	Email with K. Ortiz regarding next steps on plan (.5); prepare for Friday Committee call (.4); call with Province regarding same (.3).			
11/22/23	Pat Andriola	0.20	016	228.00
	Review and comment on draft mediation order.			
11/22/23	Donghao Yan	0.60	016	465.00
	Discuss counter plan proposal with Province (0.5); coordinate call to discuss plan proposal with SellersFunding (0.1).			
11/22/23	Stephen Wolpert	0.50	016	587.50
	Attend conference call with Province regarding plan proposal.			
11/24/23	Donghao Yan	0.80	016	620.00
	Coordinate call with SellersFunding to discuss plan proposal (0.1); discuss counter plan proposal with D. Mannal (0.6); review draft counter plan proposal (0.1).			
11/26/23	Donghao Yan	1.10	016	852.50
	Review precedents of motion to convert (0.5); draft preliminary statement included in motion to convert (0.6).			
11/27/23	Douglas Mannal	3.30	016	5,445.00
	Prep for and telephone conference with Sellers Funding regarding claim treatment and possible settlement on plan (.4); telephone conference with Province regarding plan discovery (.5); prepare for and attend conference call with counsel for CoVenture (.6); follow-up emails and telephone conference with S. Wolpert and H. Yan regarding plan objection (.5); review chapter 11 plan (1.3).			
11/27/23	Donghao Yan	0.60	016	465.00
	Attend call to discuss plan with the Debtors and CoVenture (0.6).			
11/27/23	Donghao Yan	8.60	016	6,665.00
	Research case law related to conversion (3.4); review hearing transcripts for background section of motion to convert (0.8); draft background section of motion to convert (0.9); draft proposed order to motion to convert (1.1); draft basis for relief section of motion to convert (2.4).			
11/27/23	Donghao Yan	2.10	016	1,627.50
	Draft motion to redact (0.7); draft proposed order to motion to redact (0.5); revise preliminary statement of motion to convert (0.9).			
11/28/23	Douglas Mannal	2.40	016	3,960.00
	Telephone conference with S. Wolpert regarding rule 2004 and Plan/DS objection and motion to convert to a chapter 7 case (.6); prepare for Dechert team meeting regarding same (.4); attend Dechert team meeting regarding same (.5); call with Debtors' counsel regarding intercompany claims at Benitago LTD (.2); email with Debtors' counsel regarding same (.1); email correspondence with S. Wolpert and H. Yan regarding DS objection (.3); meeting with Dechert team regarding discovery effort (.3).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/28/23	Donghao Yan	1.00	016	775.00
	Email counsel for SellersFunding regarding negotiations (0.1); review intercompany report (0.3); email Province regarding intercompany report (0.1); review disclosure statement (0.5).			
11/28/23	Stephen Wolpert	0.50	016	587.50
	Meeting with P. Andriola, D. Mannal, G. Mennitt, H. Yan regarding plan issues and discovery.			
11/28/23	Matthew Stone	0.20	016	98.00
	Review calendar regarding plan voting date (.1); email with D. Mannal regarding same (.1).			
11/29/23	Douglas Mannal	2.00	016	3,300.00
	Outline DS objection (.4); call with Province regarding liquidation analysis (.3); email correspondence with Province regarding same (.2); office conference with H. Yan regarding same (.3); review Portage liquidation analysis (.8).			
11/29/23	Donghao Yan	4.50	016	3,487.50
	Review motion to shorten notice (0.5); review disclosure statement approval motion (0.8); research issues related to motion to shorten notice (0.5); discuss status conference with D. Mannal (0.1); draft talking points for status conference (1.0); attend status conference (1.4); work with Research Services to find precedents for disclosure statement objection (0.2).			
11/30/23	Douglas Mannal	1.20	016	1,980.00
	Prep for and video hearing with Judge Lane regarding mediation (.5); review order regarding same (.2); telephone conference with Province regarding liquidation analysis and prep for Committee discussion regarding plan settlement proposals (.5).			
11/30/23	Donghao Yan	6.10	016	4,727.50
	Review research results regarding motion to convert (0.2); discuss document review with J. Moser (0.1); discuss document review with P. Andriola and J. Moser (0.5); discuss disclosure statement objection with D. Mannal (0.2); attend call with D. Mannal and Province (0.5); attend status conference on mediation (0.3); review revised mediation order (0.2); email P. Andriola regarding revised mediation order (0.1); email Debtors' counsel regarding revised mediation order (0.1); email Province regarding information for the disclosure statement objection (0.2); finalize motion to redact (0.2); draft motion to convert (1.1); draft disclosure statement objection (2.4).			
016 SUBTOTAL HOURS AND FEES:		51.80		54,148.50
019 – Committee				
11/03/23	Donghao Yan	0.20	019	155.00
	Discuss upcoming Committee meeting with Province (0.1); discuss the same with D. Mannal (0.1).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/03/23	Matthew Stone	0.30	019	147.00
	Email with H. Yan regarding proposed order for 1102 motion (.1); email with Chambers regarding same (.2).			
11/06/23	Donghao Yan	1.20	019	930.00
	Discuss Committee meeting with D. Mannal (0.1); discuss drafting an update to Committee with Province (0.5); draft Committee update (0.2); review Province's summaries of financial items for Committee update (0.2); email D. Mannal regarding Committee update (0.1); circulate Committee update (0.1).			
11/08/23	Matthew Stone	0.20	019	98.00
	Call with Chambers regarding entry of 1102 order (.1); email with H. Yan regarding same (.1).			
11/13/23	Douglas Mannal	1.10	019	1,815.00
	Prep for and attend professionals call regarding upcoming committee call and next steps; telephone conference with H. Yan regarding next steps.			
11/13/23	Donghao Yan	2.40	019	1,860.00
	Call with Province regarding preparation for team call (0.3); attend team call with Province to discuss upcoming Committee meeting (0.5); email with Debtors' counsel regarding upcoming creditors' meeting (0.1); call with Province regarding draft Committee update (0.3); email with D. Cherif regarding Committee update (0.1); draft Committee update (0.6); review Province's updates to be included in the financial update (0.2); email with D. Mannal regarding the Committee update (0.2); revise and finalize Committee update (0.3); circulate Committee update (0.1).			
11/13/23	Stephen Wolpert	0.40	019	470.00
	Call with D. Mannal and H. Yan regarding status of case and next steps regarding Committee call.			
11/14/23	Douglas Mannal	0.40	019	660.00
	Telephone with counsel for CoVenture regarding plan structure.			
11/15/23	Donghao Yan	0.30	019	232.50
	Coordinate call with the Debtors and Committee member (0.3).			
11/17/23	Donghao Yan	1.40	019	1,085.00
	Attend 341 meeting (1.1); summarize notes on 341 meeting (0.3).			
11/20/23	Douglas Mannal	0.80	019	1,320.00
	Prepare for Committee meeting (0.6); email with H. Yan regarding same (0.2).			
11/20/23	Donghao Yan	0.70	019	542.50
	Draft agenda for Committee meeting (0.4); email Province regarding meeting agenda (0.1); email with D. Mannal regarding the same (0.1); circulate agenda with the Committee (0.1).			

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>TASK</u>	<u>AMOUNT</u>
11/21/23	Douglas Manna	2.10	019	3,465.00
	Prepare for (.8) and attend call with Committee members regarding Plan contracts and next steps (.8); numerous follow-up emails regarding same (.5).			
11/21/23	Donghao Yan	0.20	019	155.00
	Coordinate Committee call (0.2).			
11/22/23	Donghao Yan	0.30	019	232.50
	Draft status summary of items to discuss at Committee meeting (0.3).			
11/24/23	Douglas Manna	2.80	019	4,620.00
	Prep for (.4) and attend meeting with Committee regarding Benitago plan term sheet and next steps (.6) draft plan proposal and email with Committee regarding same (.5); review mediation order (.3); email with H. Yan re same (.1); email with Togut regarding chapter 11 plan and payments to insiders (.6); telephone call/email with H. Yan regarding letter regarding Quinn retainer (.3).			
11/24/23	Donghao Yan	0.50	019	387.50
	Attend Committee meeting (0.5).			
11/25/23	Donghao Yan	1.20	019	930.00
	Summarize key points of Committee call and next steps in Chinese for Committee member (1.2).			
11/28/23	Douglas Manna	0.10	019	165.00
	Email with Committee regarding status of discussions with Debtors and CoVenture (.2); review and revise Committee update memorandum (.5).			
11/28/23	Donghao Yan	2.50	019	1,937.50
	Draft Committee update (1.1); coordinate Committee meeting (0.2); discuss Committee update with D. Manna (0.3); revise Committee update (0.5); review Province's financial analysis piece of Committee and provide comments (0.3); circulate Committee update (0.1).			
11/29/23	Donghao Yan	0.80	019	620.00
	Draft Committee update (0.6); revise Committee update (0.1); circulate Committee update (0.1).			
11/30/23	Donghao Yan	0.70	019	542.50
	Email Province regarding Committee update (0.2); draft Committee update (0.3); coordinate updating Committee website (0.2).			
019 SUBTOTAL HOURS AND FEES:		20.60		22,370.00
TOTAL HOURS AND FEES		203.30		USD 179,528.50

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	26.40	43,560.00
G. Mennitt	Partner	1,600.00	0.60	960.00
D. Herman	Partner	1,275.00	2.60	3,315.00
P. Andriola	Associate	1,140.00	16.90	19,266.00
D. Cherif	Associate	1,140.00	3.30	3,762.00
J. Moser	Associate	775.00	0.80	620.00
D. Yan	Associate	775.00	101.10	78,352.50
S. Wolpert	Counsel	1,175.00	4.00	4,700.00
B. Eskander	Counsel	1,105.00	2.60	2,873.00
M. Stone	Legal Assistant	490.00	43.00	21,070.00
E. Sachse	eDiscovery Specialist	525.00	2.00	1,050.00
TOTALS			203.30	USD 179,528.50



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

December 13, 2023
Invoice Number
1010124406

Firm Client Matter Number: 408863.204884

Matter Name: Benitago Inc., et al.

Professional Services Rendered Through November 30, 2023

VALUES ON THIS INVOICE ARE BILLED IN USD

TOTAL AMOUNT DUE FOR THIS INVOICE USD 189,260.36

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 (1010124406) in the check memo. Mail to:
Dechert LLP | P.O. Box 7247-6643 Philadelphia, PA | 19170-6643

EXHIBIT B

Expenses

VALUES ON THIS INVOICE ARE BILLED IN USD

DISBURSEMENTS:

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Filing Fees and Related Vendor: United Corporate Services, Inc Invoice#: P1180149 Date: 10/13/2023	9,046.00
	9,046.00
Document Storage/Retrieval Vendor: Complete Discovery Source Inc.; Invoice#: INV-CDS-38500; Date: 11/30/2023	249.30
	249.30
Westlaw Search Fees Westlaw Search Fees	436.56
	436.56
TOTAL DISBURSEMENTS	USD 9,731.86
