

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

COMPLEX BUSINESS LITIGATION
DIVISION

In re:

CRYSTAL CRUISES LLC, a California
limited liability company,

Case No. 2022-002742-CA-01
Lead Case

CRYSTAL HOLDINGS U.S., LLC, a
Delaware limited liability company,

Case No. 2022-002757-CA-01

CRYSTAL AIRCRUISES, LLC, a Florida
limited liability company, and

Case No. 2022-002758-CA-01

Assignors,
To:

(Jointly Administered Cases)

MARK C. HEALY,

Assignee.

**MOTION FOR APPROVAL OF FEES AND EXPENSES
INCURRED BY BERGER SINGERMAN LLP, AS COUNSEL TO THE
ASSIGNEE FOR THE PERIOD OF FEBRUARY 16, 2022 THROUGH JULY 31, 2022**

**NOTICE OF OPPORTUNITY TO OBJECT
TO CREDITORS AND OTHER INTERESTED PARTIES:**

PLEASE TAKE NOTICE that, pursuant to Fla Stat. § 727.111(4), the Assignee may pay the fees and expenses of professional persons employed by the Assignee as set forth herein, and the Court may consider these actions without further notice unless a party in interest files an objection before the hearing set to consider this motion. If you object to the relief requested in this paper, you must file your objection with the Miami-Dade County Clerk of the Court at 73 W. Flagler Street, Room 133, Miami, FL 33130, and serve a copy on the Assignee's counsel, Paul Steven Singerman, Esq. and Samuel Jason Capuano, Esq., Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131, and any other appropriate person. If you do not file an objection within the time permitted, the Assignee and the Court will presume that you do not oppose the granting of the relief requested in the paper.

BERGER SINGERMAN LLP (“Applicant”), pursuant to Florida Statutes §§ 727.102, 727.109(1), (10) and (15), and § 727.111(4), files this motion (the “Motion”) for approval and payment of interim fees in the amount of \$546,993.50 and reimbursement of expenses in the amount of \$6,410.71 for a total award of \$553,404.21 incurred in connection with its representation of Mark C. Healy (“Assignee”), in his capacity as the Assignee for the benefit of creditors of Crystal Cruises LLC (“Crystal Cruises”), Crystal Holdings U.S. LLC (“Crystal Holdings”), and Crystal Aircruses LLC (“Crystal Aircruses”, and, together with Crystal Cruises and Crystal Holdings, collectively, the “Assignors”) during the period of February 16, 2022 through July 31, 2022 (the “Application Period”). In support of the Motion, the Applicant states:

1. On February 10, 2022, the Assignor executed and delivered, and the Assignee accepted, irrevocable assignments for the benefit of creditors to the Assignee (collectively, the “Assignments”). On February 11, 2022 (the “Petition Date”), a *Petition Commencing Assignment for the Benefit of Creditors* was filed by the Assignee for each of the Assignors, thereby commencing the following assignment for the benefit of creditors cases pursuant to Section 727 of the Florida Statutes, in this Court: *In re Crystal Cruises LLC*, Case No. 2022-002742-CA-01, *In re Crystal Holdings U.S. LLC*, Case No. 2022-002757-CA-01, and *In re Crystal Aircruses LLC*, Case No. 2022-002758-CA-01 (collectively, the “Assignment Cases”).

2. Pursuant to Florida Statute § 727.108(7), the Applicant was retained as co-counsel, along with Nardella & Nardella, by the Assignee to perform all legal activities required for the benefit of the estates. On March 3, 2022, the Court entered an order approving the employment of Applicant as counsel to the Assignee *nunc pro tunc* to February 16, 2022.

3. Prior to the Petition Date, the Assignors were engaged in the travel and entertainment business, including operating ocean, river, and expedition cruises and conducting related activities around the world.

4. As a result of extensive efforts by the Assignee and the Applicant, including involving complex issues of cross-border insolvency and corporate law, the Assignee successfully marketed and negotiated the sale of assets of the assignment estate of Crystal Cruises, LLC (“Assignment Estate”) resulting in a total of \$13,828,884.09 for the benefit of the Assignment Estate.

5. First, on June 22, 2022, the Assignee filed the *Assignee’s Motion (I) to Approve Sale of Assets, (II) Approve Asset Purchase Agreement and Related Documents, (III) to Shorten Notice Period, and (IV) for Other Related Relief* (the “First Sale Motion”) seeking authorization to sell various assets of the Assignment Estate, including, *inter alia*, intangible assets including Crystal Cruises’ customer database, internet domain names, social media accounts and physical assets relating to the Crystal Serenity and Crystal Symphony vessels (collectively, the “Two Ships”), including inventory in a storage unit in Rotterdam in the Netherlands, marketing materials located in a storage unit in Fort Lauderdale, Florida, inventory, medical supplies, cash, and other items onboard the Two Ships, and other assets to Crystal Cruises, Ltd., an international business governed by the laws of the Commonwealth of the Bahamas, for the purchase price of \$13,000,000.

6. Following a hearing, on July 1, 2022, the Court entered an order granting the First Sale Motion and approving the sale therein.

7. Then on July 6, 2022, the Assignee filed the *Assignee’s Motion (I) to Approve Sale of Assets on Board the Crystal Endeavor Vessel, (II) Approve Asset Purchase Agreement and*

Related Documents, (III) to Shorten Notice Period, and (IV) for Other Related Relief (the “Second Sale Motion” and, collectively with the First Sale Motions, the “Sale Motions”) seeking authorization to sell assets on board the Crystal Endeavor vessel (the “Endeavor”), including certain inventory and other items, in addition to cash on board the Endeavor to Endeavor Holdings Limited, a company incorporated under the laws of the Isle of Man, for the purchase price of \$828,884.09.

8. Following a hearing on July 13, 2022, the Court entered an order granting the Second Sale Motion and approving the sale therein.

9. The Applicant has also expended a significant amount of time defending motions and actions filed by The Independent Order of Foresters (“Foresters”). Shortly after the Petition Date, on February 25, 2022, Foresters filed its *Emergency Motion for Temporary Injunction* (“Injunction Motion”) relating to deposits made by Foresters in connection with its reservation of staterooms in connection with a future cruise (the “Deposits”). The Applicant worked with Assignee on preparing and filing a response in opposition to the Injunction Motion and after a hearing on March 2, 2022 on the Injunction Motion, the Court entered its *Order on the Independent Order of Foresters’ Emergency Motion for Temporary Injunction* (the “Injunction Order”). The Injunction Order provided, among other things, reserving its ruling on the merits of the motion, that the Assignee maintain a balance of \$1,000,000 in the Crystal Cruises account held by the Assignee, and setting briefing schedule on a potential Motion to Strike the Injunction Motion on procedural grounds to be filed by the Assignee. The Assignee went on to file the *Motion to Strike Emergency Motion for Temporary Injunction of the Independent Order of Foresters* (the “Motion to Strike”), and attended a hearing on same on April 22, 2022.

10. On April 6, 2022, Foresters filed a supplemental proceeding through its Complaint against Mark C. Healy, Assignee and Crystal Cruises, LLC, Assignor, Case No. to determine the validity, priority, or extent of the Crystal Cruises estate's interest in the Deposits and for related relief (the "Foresters Complaint"). In connection with this supplemental proceeding, Applicant, along with Assignee, have expended a significant amount of time related to discovery issued by Foresters upon the Assignee. To date, the review of and production of documents by the Assignee in connection with the discovery served by Foresters continues.

11. As of August 2, 2022, the current cash balance in the estates is \$15,283,569.94 (the "Estate Funds").

12. During the Application Period, Applicant also provided additional reasonable and necessary services to the Assignment estates including, without limitation, the following:

(a) worked on first day pleadings and prepared for and attended first day hearings and other hearings held during the course of these Assignment Cases;

(b) prepared for and conducted the examination of the Assignors' representative on March 28, 2022;

(c) assisted with evaluating the assets of the estates, including intellectual property, and potential claims available to the estates;

(d) prepared for and attended status calls with the Assignee on a weekly basis with his team to discuss the Assignee's efforts to market and sell the assets of Crystal Cruises and all other matters affecting the administration of the Assignors' estates;

(e) communicated with creditors and the Assignee's team to discuss the status of these Assignment Cases;

(f) Engaged in discussions with various creditors and governmental agencies regarding claims issues, pension issues, and other issues;

(g) Reviewed post-petition litigation and drafted and filed notices of the pendency of these assignment cases, and engaged in communications with counsel in such cases;

(h) Engaged with travel insurance companies;

(i) assisted with drafting the Asset Purchase Agreement and schedules and exhibits relating to each of the Sale Motions, attending to sale of the assets, and communicating with the Assignee and his team regarding issues pertaining to the sale;

(j) assisted with the preparation of the Sale Motions discussed above and proposed orders approving the sale of the assets;

(k) conducted analysis relating to intellectual property issues relating to the sale of the Assignor's assets;

(l) prepared for and attended the hearings to consider the Sale Motions held on July 1, 2022 and July 13, 2022, respectively;

(m) revised and finalized the proposed order granting the Sale Motions;

(n) conducted discussions following the entry of the order approving the Sale Motions, assisting with the preparation of closing documents, and communicated with the purchaser of the assets regarding closing issues; and

(o) prepared motions for approval of payment of the fees of the Assignee and his professionals and preparing proposed orders granting these motions.

13. The Applicant, as counsel to the Assignee, has incurred fees in the amount of \$546,993.50 for legal services provided to the Assignee during the Application Period as identified

in the chart below and expenses in the amount of \$6,410.71 (for a total of \$553,404.21) in the nature of filing fees, court reporter fees, photocopy charges, and other expenses. Applicant's invoice is attached hereto as **Exhibit "A"**. The summary of the fees and expenses incurred are as follows:

SUMMARY OF FEES OF PROFESSIONALS

Partners/Associates & Paraprofessionals	Hours	Rate	Total
Paul Steven Singerman	39.40	\$765.00	\$30,141.00
Daniel Lampert	92.90	\$730.00	\$67,817.00
Ilyse M. Homer	182.60	\$595.00	\$108,647.00
Geoffrey Lottenberg	10.40	\$550.00	\$5,720.00
Samuel J. Capuano	521.80	\$525.00	\$273,945.00
Jessie G. Torres	3.40	\$360.00	\$1,224.00
Arturo Fernandez	6.0	\$275.00	\$1,650.00
Carmen M. Cruz	199.30	\$265.00	\$52,814.50
Jeffrey L. Hajny	19.00	\$265.00	\$5,035.00
TOTALS	1,074.80		\$546,993.50

SUMMARY OF EXPENSES INCURRED

Type of Expense	Amount of Expense
Conference Call Charges	\$938.14
Reproductions/Photocopies	\$534.30
Court Reporter/Transcript Fees	\$1,974.90
E-Discovery Data Storage Fee	\$1,932.00
Federal Express Charges	\$98.82
Postage	\$1.96
UCC Searches	\$493.50
Westlaw	\$205.07
Working Meals	\$232.02
Total Expenses	\$6,410.71

14. Given the nature of these proceedings, and the amount of work that went into representing the Assignee during the Application Period, the Applicant respectfully requests that the Court approve this Application and allow the Applicant an interim award of fees in the amount of \$553,404.21 and reimbursement of expenses in the amount of \$6,410.71, for a total of \$553,404.21 for the period of February 16, 2022 through July 31, 2022.

15. There will be no prejudice to any party in respect of the requested interim distribution as it is being made for the purpose of administering the estate, and the fees sought by Applicant will be subject to final review and objection at the end of this case.

WHEREFORE, the Assignee respectfully requests that this Court enter an Order, in the form attached hereto as **Exhibit "B"**, (i) granting the Motion; (ii) approving the Applicant's request for compensation for services rendered in the amount of **\$546,993.50** and reimbursement of expenses in the amount of **\$6,410.71**, (iii) authorizing the Assignee to pay the Applicant the sum of **\$553,404.21** representing the fees and expenses awarded; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: August 19, 2022

BERGER SINGERMAN LLP
Co-Counsel for Assignee
1450 Brickell Avenue, Suite 1900
Miami, FL 33131
Telephone: (305) 755-9500
Facsimile: (305) 714-4340

By: /s/ Samuel J. Capuano
Paul Steven Singerman
Florida Bar No. 378860
singerman@bergersingerman.com
Samuel J. Capuano
Florida Bar No. 90946
scapuano@bergersingerman.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal on August 19, 2022 to all parties that have entered an appearance in this case; on counsel for the Assignors, Adam Losey, Esq., Losey PLLC, 1420 Edgewater Drive, Orlando, FL 32804, via email to alosey@losey.law; via email to cbl44@jud11.flcourts.org pursuant to CBL Rule 2.2; and via e-mail to all creditors and interested parties on the e-mail service list pursuant to the Notice Procedures Order.

By: /s/ Samuel J. Capuano
Samuel J. Capuano

EXHIBIT A
(Invoices)

BERGER SINGERMAN

201 E. LAS OLAS BLVD. SUITE 1500
FORT LAUDERDALE, FLORIDA 33301
T: (954) 525-9900 F: (954) 523-2872
WWW.BERGERSINGERMAN.COM
EIN# 45-3121429

MARK C. HEALY, IN HIS CAPACITY AS ASSIGNEE
FOR THE BENEFIT OF CREDITORS OF CRYSTAL
CRUISES, LLC
841 PRUDENTIAL DRIVE
JACKSONVILLE, FL 32207

July 15, 2022
Invoice: 255069

Client: 30806-0001

Re: ***REPRESENTATION OF ASSIGNEE FOR THE BENEFIT
OF CREDITORS OF CRYSTAL CRUISES LLC***

For professional services rendered thru: ***June 30, 2022***

Total Fees	461,421.50
Total Expenses	4,514.05
Total Balance Due	\$465,935.55


As always, it is our pleasure to work with you! Payment is due upon receipt.

Payments Options:

You may remit payment via check or visit www.bergersingerman.com/info/client-tools/ to pay with credit card.
If you wish to remit payment via wire transfer, please refer to the instructions below.

Thank you!

Wiring instructions for Berger Singerman:

Bank:	City National Bank of Florida
Bank Address:	25 W Flagler Street Miami, FL 33130
ABA No.:	066004367
Account Name:	Berger Singerman, LLP Merchant Account
Account No.:	
Reference Number:	30806-0001



MARK C. HEALY, IN HIS CAPACITY AS
 ASSIGNEE FOR THE BENEFIT OF CREDITORS OF
 CRYSTAL CRUISES, LLC
 841 PRUDENTIAL DRIVE
 JACKSONVILLE, FL 32207

INVOICE DATE: July 15, 2022
 INVOICE NO. 255069

REPRESENTATION OF ASSIGNEE FOR THE BENEFIT OF
 CREDITORS OF CRYSTAL CRUISES LLC

MATTER ID: 30806-0001

PROFESSIONAL LEGAL SERVICES RENDERED THROUGH: June 30, 2022

F E E S

Date	Attorney	Description	Hours
02/16/22	PSS	REVIEW MOTIONS TO TRANSFER AND CONSOLIDATE AND MEMOS TO/FROM S. CAPUANO RE SAME (.3) MEETING WITH ASSIGNEE AT CRYSTAL OFFICES RE STATUS AND OPEN ISSUES AND WORK PLAN (1.6) FOLLOW UP WITH I HOMER AND S. CAPUANO RE TASK LIST AND MOTION TO TRANSFER AND CONSENT OF ASSIGNOR (.4)	2.30
02/16/22	IMH	PREPARE FOR MEETING WITH ASSIGNEE INCLUDING TEAM MEETINGS, REVISIONS TO TASK LIST, RESEARCH REGARDING COMPLEX BUS COURT RULES AND WORK ON BACK UP TO RETENTION PAPERS (2.1); RESEARCH REGARDING BERMUDA CASE FOR PARENT GENTING (.4); ATTEND INITIAL MEETING WITH M HEALY, P VON KAHLE AND BERGER SINGERMAN TEAM (3.5); PREPARE NOTICE PROCEDURES MOTION (.8); EMAILS WITH P VON KAHLE REGARDING NEXT STEPS AND OPEN ISSUES (.2)	7.00
02/16/22	CC	PREPARE MOTION TO TRANSFER CASE TO DIVISION 44 AND PROPOSED FORM OF ORDER.	0.60
02/16/22	CC	PREPARE MOTION TO CONSOLIDATE AND JOINTLY ADMINISTER CASES FOR ADMINISTRATIVE PURPOSES ONLY AND PROPOSED FORM OF ORDER.	0.80
02/16/22	CC	PREPARE MOTION TO EMPLOY BERGER SINGERMAN AS COUNSEL TO ASSIGNEE.	0.50
02/16/22	CC	PREPARE ORGANIZATIONAL CHART.	0.80

F E E S

Date	Attorney	Description	Hours
02/16/22	CC	WORK ON ABC CHECKLIST.	0.40
02/16/22	CC	WORK ON CONFLICT SEARCH.	0.40
02/16/22	SJC	PREPARE FOR MEETING WITH ASSIGNEE AND TEAM AT ASSIGNOR OFFICES (1.5); ATTEND MEETING WITH ASSIGNEE AND TEAM AT ASSIGNOR OFFICES (3.5); REVISE ABC CHECKLIST AND CIRCULATE (1.0); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE'S TEAM REGARDING VARIOUS INITIAL CASE ISSUES, DRAFTING, CLAIMS ISSUES; CONFLICTS ANALYSIS, ASSIGNOR EXAM, RESEARCH, AND PROCEDURAL MATTERS (1.8); CONFERENCE CALL WITH A LOSEY REGARDING MOTIONS TO TRANSFER AND CONSOLIDATE AND EMAIL COMMUNICATIONS REGARDING SAME (.4); CONDUCT INITIAL UCC SEARCH AND COMMUNICATIONS REGARDING SAME (.4); DRAFT MOTION TO TRANSFER VENUE AND AGREED ORDER ON SAME AND CIRCULATE, AND RESEARCH AND COMMUNICATIONS REGARDING SAME (1.4); DRAFT MOTION TO CONSOLIDATE AND JOINTLY ADMINISTER FOR PROCEDURAL PURPOSES AND PROPOSED ORDER, AND RESEARCH AND COMMUNICATIONS IN CONNECTION WITH SAME (1.8)	11.80
02/17/22	PSS	MEMOS FROM/TO S. CAPUANO REGARDING AGENDA FOR MEETING WITH ASSIGNEE AND P. VON KAHLE AND CO-COUNSEL (.2); CALL WITH ASSIGNEE AND P. VON KAHLE AND CO-COUNSEL AND BSLLP TEAM REGARDING OPEN ISSUES AND CASE ADMIN MATTERS (1.1)	1.30
02/17/22	IMH	DISCUSSION WITH CLERK'S OFFICE REGARDING PROCEDURES FOR HEARINGS AND CBD SCHEDULE (.2); NUMEROUS TEAM DISCUSSIONS REGARDING ROLLING TASK LIST AND OPEN ISSUES AND FOLLOW UP (1.2); PREPARE FOR TODAY'S CLIENT CALL INCLUDING REVISIONS TO AGENDA (.3); RESEARCH REGARDING BERMUDA COUNSEL (.3); ATTN TO ISSUES REGARDING RETENTION APPLICATION (.6); PARTICIPATE IN ALL HANDS ON CALL WITH MOECKER TEAM AND NARDELLA TEAM (1)	3.60
02/17/22	CC	PREPARE MOTION TO APPROVE NOTICING PROCEDURES AND FORM OF PROOF OF CLAIM FORM AND PROPOSED FORM OF ORDER.	2.00
02/17/22	CC	ATTEND TEAM CONFERENCE CALL.	1.50
02/17/22	CC	FINALIZE AND E-FILE AGREED MOTION TO TRANSFER CASE TO DIVISION 44.	0.40
02/17/22	CC	FINALIZE AND UPLOAD PROPOSED ORDER GRANTING	0.30

F E E S

Date	Attorney	Description	Hours
		AGREED MOTION TO TRANSFER CASE TO DIVISION 44 ON COURTMAP.	
02/17/22	CC	PREPARE UCC SEARCH RESULTS CHART.	1.50
02/17/22	CC	WORK ON CONTACT LIST.	0.50
02/17/22	CC	REVIEW PROPOSED NOTICE OF ASSIGNMENT AND PROOF OF CLAIM FORMS; CONFER WITH I. HOMER RE SAME.	0.20
02/17/22	CC	CONFER WITH N. JOSEPH RE INTENTIONS WITH RESPECT TO PROOF OF CLAIM FORMS.	0.20
02/17/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE'S TEAM REGARDING VARIOUS ITEMS INCLUDING PLEADINGS TO BE FILED, RULES AND PROCEDURES, FIRST DAY HEARINGS, COMMUNICATIONS, PROOF OF CLAIM FORMS, RETENTION OF PROFESSIONALS, PENDING LITIGATION, SECURED STATUS OF CREDITORS, AND SECURING ASSETS (2.2); PREPARE FOR AND ATTEND CONFERENCE CALL WITH ASSIGNEE, ASSIGNEE'S TEAM, CO-COUNSEL, AND TEAM REGARDING VARIOUS PENDING ITEMS (2.5); DRAFT AND CIRCULATE TASK LIST AND AGENDA WITH DEADLINES AND DELIVERABLES AND REVIEW AND APPLY PROPOSED REVISIONS TO SAME (1.5); FINALIZE AND FILE MOTION TO TRANSFER DIVISIONS AND SUBMIT PROPOSED ORDER ON SAME, AND COMMUNICATIONS REGARDING SAME (1.0); FINALIZE AND CIRCULATE THREE MOTIONS TO CONSOLIDATE AND JOINTLY ADMINISTER FOR PROCEDURAL PURPOSES AND PROPOSED ORDER, AND RESEARCH AND COMMUNICATIONS IN CONNECTION WITH SAME (1.4); REVIEW NOTICE OF ASSIGNMENT AND COMMUNICATIONS WITH TEAM REGARDING SAME (.2); REVIEW AND REVISE RETENTION APPLICATION (.4).	9.20
02/18/22	PSS	REVIEW AND REVISE RETENTION APPLICATION AND MEMO TO S. CAPUANO REGARDING SAME (.3); TELEPHONE CALL FROM ASSIGNEE REGARDING STATUS AND OPEN ISSUES (.4)	0.70
02/18/22	IMH	REVIEW DOCKET AND COMMUNICATE WITH NARDELLA FIRM REGARDING NEW AND PENDING LITIGATION (.3); ANALYSIS FOR LOGISTICS OF SERVING NOTICE OF ASSIGNMENT WITH CLAIM FORM AND NOTICE PROCEDURES MOTION (.3); RESEARCH REGARDING OVER-RESERVES AS THEY RELATE TO CONSUMER DEPOSITS (1.3); COMMUNICATE WITH CLERK'S OFFICE REGARDING DISPOSITION OF TRANSFER MOTION (.2); STRATEGIZE	2.50

F E E S

Date	Attorney	Description	Hours
		REGARDING DISCLOSURES RELATED TO APPLICATION PAPERS (.2); REVISE SAME (.2)	
02/18/22	CC	PREPARE TASK LIST.	1.80
02/18/22	CC	PREPARE LETTER TO JUDGE BAILEY RE ENCLOSING PROPOSED ORDER GRANTING MOTION TO TRANSFER CASE TO DIVISION 44; FINALIZE PROPOSED ORDER AND LETTER AND EMAIL SAME.	0.60
02/18/22	CC	WORK ON UPDATING CONTACT LIST; CIRCULATE SAME.	0.30
02/18/22	SJC	PREPARE FOR AND ATTEND CONFERENCE CALLS WITH M NARDELLA AND P MASCIA REGARDING VARIOUS CASE ISSUES, PLEADINGS, AND FIRST DAY MATTERS (1.1); DRAFT MOTIONS TO EMPLOY BERGER SINGERMAN AS COUNSEL TO ASSIGNEE, AND COMMUNICATIONS WITH TEAM AND CO-COUNSEL IN CONNECTION WITH SAME, REVIEW PROPOSED REVISIONS FROM P SINGERMAN AND I HOMER REGARDING SAME, AND REVIEW NARDELLA MOTIONS TO EMPLOY (2.2); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, CO-COUNSEL AND ASSIGNEE REGARDING VARIOUS ITEMS INCLUDING PLEADINGS TO BE FILED, FIRST DAY HEARINGS, ASSIGNOR EXAMINATION, TASK LISTS, PUBLICATION OF NOTICE OF ASSIGNMENT, AND ASSET RECOVERY ISSUES (1.9); FINALIZE AND SUBMIT LETTER TO CHAMBERS CONCERNING MOTION TO TRANSFER VENUE AND PROPOSED ORDER, AND COMMUNICATIONS WITH TEAM REGARDING SAME, AND TELEPHONE CONFERENCE WITH CHAMBERS FOR ADMINISTRATIVE JUDGE REGARDING SAME (1.1); REVIEW MOTIONS TO SET BONDS AND CIRCULATE COMMENTS (.6);	6.90
02/19/22	IMH	TEAM EMAILS REGARDING ASSIGNEE FEE MOTION (.2); STRATEGIZE REGARDING FILINGS FOR 2/22 AND FIRST DAY HEARING (.3); PREPARE FOR SAME (1)	1.50
02/19/22	SJC	RESEARCH IN CONNECTION WITH FEE ISSUES AND COMMUNICATIONS WITH TEAM IN CONNECTION WITH SAME (.7); COMMUNICATIONS WITH CO-COUNSEL AND TEAM REGARDING DEMAND FOR TURNOVER OF FUNDS (.2)	0.90
02/21/22	PSS	MEMO FROM/TO S CAPUANO RE MEMO FROM G. FREEDMAN DEMAND (.2) MEMOS FROM/TO S. CAPUANO RE STATUS OF OPEN ISSUES AND WEEKLY STATUS CALL AND DEBRIEF AFTER WEEKLY STATUS CALL (.2)	0.40
02/21/22	IMH	REVIEW AND ANALYZE DOCUMENTS REGARDING	3.70

F E E S

Date	Attorney	Description	Hours
		POTENTIAL BERMUDA COUNSEL (.3); ANALYSIS REGARDING DISCLOSURES TO BE MADE IN PROFESSIONAL APPLICATIONS TO BE FILED (.6); PARTICIPATE IN BERGER SINGERMAN TEAM DISCUSSIONS RELATED TO VARIOUS OPEN ISSUES (.8); PARTICIPATE IN STANDING TEAM CALL WITH M HEALY AND NARDELLA TEAM TO DISCUSS TASK LIST (.6); NUMEROUS EMAILS AND COMMUNICATIONS THROUGHOUT THE DAY REGARDING COORDINATION AMONG PROFESSIONALS AND REVISIONS TO PENDING MOTIONS AND TASK LIST (1.4)	
02/21/22	CC	PREPARE, FINALIZE AND E-FILE NOTICES OF APPEARANCE FOR P. SINGERMAN, I. HOMER AND S. CAPUANO IN ALL THREE ASSIGNMENT CASES.	1.80
02/21/22	CC	ATTEND CONFERENCE CALL WITH I. HOMER AND S. CAPUANO RE TASK LIST AND PENDING DELIVERABLES.	0.70
02/21/22	CC	ATTEND TEAM STATUS CALL.	0.80
02/21/22	CC	FINALIZE AND E-FILE MOTION TO EMPLOY BSLLP AS COUNSEL TO ASSIGNEE IN ALL THREE ASSIGNMENT CASES.	0.80
02/21/22	CC	FINALIZE AND E-FILE MOTION TO CONSOLIDATE AND JOINTLY ADMINISTER ASSIGNMENT CASES IN ALL THREE ASSIGNMENT CASES.	0.80
02/21/22	CC	UPDATE TASK LIST.	1.00
02/21/22	CC	LOOK UP CASES IN MIAMI-DADE AND BROWARD COUNTIES FOR NECESSARY STRING CITE RELATED TO MOTION TO DETERMINE RATE OF COMPENSATION OF ASSIGNEE.	1.00
02/21/22	SJC	REVISE AND CIRCULATE RUNNING TASK LIST TO CO-COUNSEL AND CLIENT (1.0); PREPARE FOR AND ATTEND CONFERENCE CALL WITH ASSIGNEE REGARDING FILING OF PLEADINGS, ASSIGNOR EXAMINATION, AND CONSUMER CREDITOR ISSUES, AND COMMUNICATIONS WITH TEAM REGARDING SAME (.8); RESEARCH REGARDING CONSUMER CREDITOR ISSUES (1.2); PREPARE FOR AND ATTEND CONFERENCE CALL WITH CO-COUNSEL, TEAM, AND ASSIGNEE REGARDING VARIOUS PENDING MATTERS (1.1); COMMUNICATIONS WITH POTENTIAL LOCAL COUNSEL IN BERMUDA (.2); DRAFT MOTION TO APPROVE RATE OF COMPENSATION FOR ASSIGNEE, RESEARCH REGARDING SAME, AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.3); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH CO-COUNSEL AND TEAM	7.20

F E E S

Date	Attorney	Description	Hours
		REGARDING FILING OF PLEADINGS, DEMAND FOR FUNDS, AND OTHER PENDING CASE MATTERS (1.6).	
02/22/22	PSS	MEMOS FROM/TO S. CAPUANO REGARDING ORDER ON MOTION TO TRANSFER AND STATUS	0.20
02/22/22	IMH	DISCUSSIONS WITH CLERK OF COURT REGARDING PENDING MOTIONS AND TIMING FOR UPCOMING HEARING (.4); REVIEW MATERIALS RELEVANT TO DEPOSITION OF ASSIGNOR (.3); INTERNAL TEAM DISCUSSIONS REGARDING OPEN ISSUES (.4); ANALYZE STATUTE RELATED TO NOTICE AND STRATEGIZE REGARDING MODIFICATION TO NOTICE PROCEDURES MOTION (.4)	1.50
02/22/22	CC	PREPARE OUTLINE FOR EXAMINATION OF ASSIGNOR.	1.00
02/22/22	CC	UPDATE TASK LIST TO ADD DEADLINES ASSOCIATED WITH RECENTLY ENTERED ORDERS.	0.60
02/22/22	CC	REVIEW CBL PROCEDURES AND ADD RELEVANT PROCEDURES TO TASK LIST.	0.40
02/22/22	SJC	DRAFT MOTION TO ESTABLISH NOTICING PROCEDURES, APPROVE PROOF OF CLAIM FORMS, AND EXTEND DEADLINE TO SERVE NOTICE OF ASSIGNMENT, RESEARCH IN CONNECTION WITH SAME, REVIEW PROPOSED REVISIONS TO SAME FROM TEAM, AND COMMUNICATIONS WITH TEAM REGARDING SAME (2.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING VARIOUS MATTERS INCLUDING RESEARCH, FILING OF PLEADINGS, ASSIGNOR EXAMINATION, TRANSFER OF CASE, AND OTHER MATTERS (1.5); COMMUNICATIONS WITH CHAMBERS FOR ADMINISTRATIVE JUDGE REGARDING TRANSFER OF CASE AND COMMUNICATIONS WITH TEAM REGARDING SAME, REVIEW TRANSFER ORDER, AND CIRCULATE TO TEAM (.7); EMAIL COMMUNICATIONS WITH PROPOSED BERMUDA COUNSEL AND ASSIGNEE REGARDING RETENTION ISSUES (.5); REVIEW ORDERS ENTERED SETTING CASE MANAGEMENT DEADLINES AND SETTING INITIAL CASE MANAGEMENT CONFERENCES, AND COMMUNICATIONS WITH TEAM REGARDING SAME (.5).	5.70
02/23/22	PSS	MEMOS FROM/TO S. CAPUANO REGARDING STATUS AND DATES FOR DEPOS OF ASSIGNORS AND CASE MANAGEMENT CONFERENCE AND NOTICE MOTION	0.30
02/23/22	IMH	REVIEW CBD RULES REGARDING NEED FOR HEARING ON CERTAIN MATTERS (.2); TEAM EMAILS REGARDING SAME (.1); TEAM DISCUSSIONS	1.70

F E E S

Date	Attorney	Description	Hours
		REGARDING PREP FOR CASE MANAGEMENT HEARING AND DEPOSITION OF ASSIGNOR (.4); EMAILS REGARDING NOTICE PROCEDURES MOTION (.2); REVISE TASK LIST AND PREPARE FOR 2/24 STANDING TEAM CALL (.3); REVISE NOTICE PROCEDURES MOTION (.1); PREPARE AGREED ORDER REGARDING SAME (.2); TEAM DISCUSSIONS REGARDING SAME (.2)	
02/23/22	CC	PREPARE PROPOSED ORDERS GRANTING ASSIGNEE'S MOTION FOR ENTRY OF AN ORDER APPROVING NOTICE PROCEDURES, PROOF OF CLAIM FORMS AND EXTENDING DEADLINE TO SERVE NOTICE.	0.60
02/23/22	CC	PREPARE MOTION TO EMPLOY KENNEDYS AS BERMUDA COUNSEL TO ASSIGNEE.	0.80
02/23/22	CC	PREPARE NOTICE OF EXAMINATION OF ASSIGNOR, CRYSTAL CRUISES, LLC	0.40
02/23/22	CC	PREPARE AGREED MOTION FOR EXTENSION OF TIME TO EXAMINE ASSIGNOR.	0.60
02/23/22	CC	WORK ON ASSIGNEE'S MOTION FOR ENTRY OF AN ORDER APPROVING NOTICE PROCEDURES, PROOF OF CLAIM FORMS AND EXTENDING TIME TO SERVE NOTICE OF ASSIGNMENT.	0.60
02/23/22	CC	PREPARE AND FINALIZE EMAIL TO CBL44 FOR EACH CRYSTAL CRUISES CASE CONTAINING ALL PLEADINGS FILED TO DATE.	0.60
02/23/22	CC	UPDATE TASK LIST.	0.40
02/23/22	CC	WORK ON OUTLINE FOR EXAMINATION OF ASSIGNORS.	0.50
02/23/22	SJC	REVISE AND CIRCULATE MOTION TO APPROVE NOTICING PROCEDURES AND PROOF OF CLAIM FORMS, COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME, AND REVISE ORDER ON SAME (1.6); COMMUNICATIONS WITH CHAMBERS REGARDING INITIAL CASE MANAGEMENT CONFERENCE AND COMMUNICATIONS WITH TEAM REGARDING SAME, AND REVIEW ORDERS AND NOTICE FROM COURT REGARDING SAME (.8); REVISE ROLLING TASK LIST AND COMMUNICATIONS WITH TEAM REGARDING SAME (.9); REVIEW DEMAND LETTER FROM TRAVEL AGENCY AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (.5); CONFERENCE CALLS WITH ASSIGNEE AND TEAM REGARDING VARIOUS CASE ISSUES INCLUDING ASSIGNOR EXAMINATION, MOTION REGARDING NOTICE PROCEDURES, PROOF OF CLAIM FORMS, FIRST DAY HEARINGS, SERVICE OF	7.40

F E E S

Date	Attorney	Description	Hours
		DOCUMENTS, AND OTHER MATTERS (1.7); REVIEW DRAFT PROOF OF CLAIM FORMS AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (.4); EMAIL COMMUNICATIONS WITH PROPOSED BERMUDA COUNSEL REGARDING RETENTION ISSUES (.3); WORK ON ASSIGNOR EXAMINATION PREPARATION AND BEGIN WORKING ON NOTICE AND MOTION TO EXTEND TIME FOR SAME (.8); REVIEW CORRESPONDENCE REGARDING ARRESTED VESSEL IN URUGUAY AND COMMUNICATIONS WITH TEAM REGARDING STAFFING ON MATTER (.4).	
02/24/22	IMH	CALLS WITH M HEALY AND S CAPUANO REGARDING COURT RULES AND REQUIREMENTS (.4); SEVERAL TEAM DISCUSSIONS REGARDING TERMS AND ENTRY OF PENDING MOTIONS AND PREPARATION FOR UPCOMING HEARINGS (.6); PREPARE FOR STANDING TEAM CALL INCLUDING REVISIONS TO TASK LIST AND ATTN TO OPEN ITEMS ASSIGNED TO BERGER SINGERMAN (.5); PARTICIPATE IN BI-WEEKLY STANDING CALL (.8); FOLLOW UP REGARDING IP COUNSEL (.2)	2.50
02/24/22	CC	ATTEND TEAM STATUS CALL.	0.80
02/24/22	CC	WORK ON MOTIONS TO APPROVE NOTICING PROCEDURES, PROOF OF CLAIM FORMS AND EXTEND TIME TO SERVE NOTICE OF ASSIGNMENT AND PROPOSED FORMS OF ORDER.	1.00
02/24/22	CC	WORK ON MOTION TO EMPLOY BERMUDA COUNSEL TO INCLUDE COMPENSATION SECTION.	0.40
02/24/22	CC	UPDATE TASK LIST; REVISE DEADLINES ASSOCIATED WITH RESCHEDULED INITIAL CASE MANAGEMENT CONFERENCES.	0.60
02/24/22	GL	INITIAL ASSESSMENT OF IP ISSUES/TRADEMARK REGISTRATION OWNERSHIP.	0.40
02/24/22	SJC	REVIEW AND REVISE MOTION TO LIMIT NOTICE, APPROVE CLAIM FORMS, AND EXTEND DEADLINES, AS WELL AS ORDER ON SAME AND EXHIBITS, AND TELEPHONE CONFERENCES, MEETINGS, AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (1.7); REVIEW AND REVISE PROOF OF CLAIM FORMS AND COMMUNICATIONS REGARDING SAME (.7); TELEPHONE CONFERENCES AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND CO-COUNSEL REGARDING FILINGS, HEARINGS, NOTICE ISSUES, DEMANDS, IP ISSUES, AND OTHER MATTERS (1.2); REVIEW AMENDED CASE MANAGEMENT ORDERS AND NOTICES OF HEARING	7.40

F E E S

Date	Attorney	Description	Hours
		IN ALL CASES (.3); COMMUNICATIONS WITH COUNSEL FOR ALLIANZ REGARDING DEMAND (.2); COMMUNICATIONS WITH ASSIGNOR COUNSEL REGARDING MOTION TO LIMIT NOTICE (.1); REVISE AND CIRCULATE TASK LIST TO TEAM AND COCOUNSEL, AND COMMUNICATIONS WITH TEAM REGARDING SAME (.5); PREPARE FOR AND ATTEND CONFERENCE CALL WITH TEAM, COCOUNSEL, AND ASSIGNEE (1.2); REVISE MOTION TO EXTEND DEADLINE TO TAKE ASSIGNOR EXAMINATION AND NOTICE OF EXAMINATION (.9); REVISE MOTION TO EMPLOY BERMUDA COUNSEL (.6)	
02/25/22	PSS	MEMOS FROM/TO S. CAPUANO RE HEARING DATES AND STATUS (.4) IOC S. CAPUANO AND I HOMER RE CONSUMER ISSUES AND TEL CONFERENCE W/ M. HEALY RE SAME (.7)	1.10
02/25/22	IMH	ANALYSIS IN SUPPORT OF ISSUES RELATED TO CONSUMER ISSUES AND PREPARE FOR TEAM CALL REGARDING SAME (1.1); PARTICIPATE IN BERGER SINGERMAN TEAM CALL REGARDING SAME (.5); FOLLOW UP CALL WITH M HEALY REGARDING CRYSTAL WEBSITE (.2); ATTN TO ISSUES REGARDING SAME (.2); PREPARE FOR FIRST DAY HEARINGS (.5); STRATEGIZE REGARDING G FREEDMAN TRO AND OUTLINE ISSUES FOR RESPONSIVE PLEADING (.6); REVIEW DOCUMENTS AND ANALYSIS IN SUPPORT OF WEBSITE PAGE (.4);	3.50
02/25/22	CC	WORK ON OUTLINE FOR EXAMINATION OF ASSIGNOR.	1.20
02/25/22	CC	FINALIZE AND E-FILE MOTION TO APPROVE NOTICING PROCEDURES, PROOF OF CLAIM FORMS AND EXTENDING TIME TO SERVE NOTICE OF ASSIGNMENT.	1.00
02/25/22	CC	EMAIL TO CBL44 IN ALL 3 CASES THE MOTION TO APPROVE NOTICE PROCEDURES, PROOF OF CLAIM FORMS AND EXTENDING TIME TO SERVE NOTICE OF ASSIGNMENT.	0.30
02/25/22	CC	PREPARE E-BINDER FOR FIRST DAY HEARINGS.	0.50
02/25/22	GL	RESEARCH REGARDING IP/TRADEMARK HOLDINGS OF CRYSTAL ENTITIES. CONFERENCE CALL WITH CO-COUNSEL REGARDING TRADEMARK ISSUES IN VIEW OF ABC PROCEEDINGS, AND POTENTIAL FOR LEGAL ISSUES WITH ISLE OF MAN ENTITY.	1.20
02/25/22	SJC	PREPARE FOR AND ATTEND CONFERENCE WITH	6.10

F E E S

Date	Attorney	Description	Hours
		ALLIANZ REGARDING DEMAND AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (1.1); FINALIZE AND FILE MOTION TO ESTABLISH NOTICING PROCEDURES AND TO APPROVE CLAIM FORM AND EXTEND DEADLINES, AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (1.1); CONFERENCES AND COMMUNICATIONS WITH COCOUNSEL AND G FREDMAN REGARDING DEMAND FROM FORESTERS AND RESPONSE, AND REVIEW FILED MOTION (1.7); REVIEW AND ANALYZE DEMAND FROM ALLIANZ AND CONTRACT, LEGAL RESEARCH REGARDING SAME, AND PREPARE FOR AND ATTEND CONFERENCE CALL WITH COUNSEL FOR ALLIANZ (1); PREPARE FOR AND ATTEND CONFERENCE CALL WITH TEAM REGARDING CONSUMER ISSUES AND RELATED ISSUES (.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING VARIOUS ISSUES INCLUDING FIRST DAY HEARINGS, PLEADINGS, COMMUNICATIONS WITH THIRD PARTIES, AND OTHER MATTERS (.5); COMMUNICATIONS WITH TEAM REGARDING IP ISSUE (.2)	
02/26/22	PSS	MEMOS FROM/TO M. NESTOR RE CRYSTAL CASE AND MEMOS FROM/TO M HEALY RE SAME.	0.10
02/26/22	IMH	EMAILS AND ANALYSIS RELATED TO HEARING ON FORESTERS EMERGENCY MOTION FOR TRO	0.60
02/26/22	SJC	REVIEW AND ANALYZES EMERGENCY MOTION FOR TEMPORARY INJUNCTION FROM FORESTERS AND ATTACHMENTS AND RELEVANT CONTRACTS, LEGAL RESEARCH IN CONNECTION WITH SAME, WORK ON RESPONSE, AND COMMUNICATIONS WITH TEAM AND COCOUNSEL REGARDING SAME	3.00
02/27/22	PSS	TEL CONFERENCE WITH ██████████ RE STATUS AND INTEREST OF PROSPECTIVE PURCHASER AND MEMO TO TEAM RE DEBRIEF OF CALL WITH ██████████.	0.60
02/27/22	IMH	WORK ON AND REVIEW MATERIALS FOR WEBSITE; RESEARCH IN SUPPORT OF SAME	1.70
02/27/22	SJC	COMMUNICATIONS WITH TEAM REGARDING ACTION ITEMS	0.50
02/28/22	PSS	MEMOS FROM/TO S. CAPUANO AND REVIEW AND REVISE RESPONSE TO FORESTER MOTION FOR EMERGENCY INJUNCTION (.8) STATUS CALL WITH CLIENT AND CO-COUNSEL (.3)	1.10
02/28/22	IMH	NUMEROUS EMAILS REGARDING THIS WEEK'S COURT HEARINGS (.4); TEAM DISCUSSIONS REGARDING	3.10

F E E S

Date	Attorney	Description	Hours
		SAME (.4); BEGIN PREPARATION FOR SAME (.5); TEAM EMAILS RELATED TO TRADEMARK REGISTRATIONS OWNED BY CRYSTAL AFFILIATE (.2); REVISE TASK LIST FOR TONIGHT'S STANDING TEAM CALL (.2); CONTINUE WORK ON FAQs FOR WEBSITE (.9); PARTICIPATE IN STANDING TEAM STATUS CALL (.5)	
02/28/22	CC	WORK ON DRAFT OF WEBPAGE FOR ASSIGNMENT CASES.	2.50
02/28/22	CC	WORK ON SCRIPT FOR FIRST DAY HEARINGS.	2.50
02/28/22	CC	PREPARE E-BINDER FOR FIRST DAY HEARINGS.	1.50
02/28/22	CC	UPDATE TASK LIST FOR 5:00 P.M. TEAM STATUS CALL.	0.40
02/28/22	CC	ATTEND TEAM STATUS CALL.	0.50
02/28/22	GL	FOLLOW UP ON STRATEGY AND ASSESSMENT OF IP ASSETS.	0.30
02/28/22	SJC	PREPARE FOR AND ATTEND CONFERENCE CALL WITH TEAM, COCOUNSEL, AND ASSIGNEE REGARDING VARIOUS ISSUES INCLUDING FIRST DAY HEARINGS, PLEADINGS, DEMANDS FROM CREDITORS, AND OTHER MATTERS (1.2); CONFERENCE CALLS WITH G FREEDMAN, TEAM, ASSIGNEE, AND COCOUNSEL REGARDING DEMAND FROM FORESTERS, RESPONSE, POTENTIAL RESOLUTION, AND RELATED MATTERS (1.5); DRAFT AND CIRCULATE RESPONSE TO FORESTERS' MOTION FOR TEMPORARY INJUNCTION AND DRAFT AFFIDAVIT IN SUPPORT, LEGAL AND FACTUAL RESEARCH IN CONNECTION WITH SAME, REVIEW COMMENTS AND PROPOSED REVISIONS TO SAME FROM P SINGERMAN, AND CIRCULATE SAME TO GROUP (4.7); REVIEW AND REVISE DRAFT WEBSITE LANGUAGE AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.2); REVIEW DEMAND FROM DISTRIBUTIONS BMB CREDITOR AND DOCUMENTATION, AND COMMUNICATIONS WITH COUNSEL AND TEAM REGARDING SAME (.8); COMMUNICATIONS WITH ASSIGNOR COUNSEL AND COCOUNSEL REGARDING MOTION TO EXTEND DEADLINE TO CONDUCT EXAMINATION AND FIRST DAY HEARINGS (.9); COMMUNICATIONS WITH CHAMBERS, TEAM, ASSIGNEE AND COUNSEL FOR FORESTERS REGARDING SCHEDULING OF FIRST DAY HEARINGS (.8);	11.10
03/01/22	PSS	INTEROFFICE CONFERENCE WITH S. CAPUANO RE STATUS AND RESPONSE TO FORESTERS AND TELEPHONE CONFERENCE WITH M. HEALY RE STATUS AND PREP FOR FIRST DAY HEARINGS (1.4) REVIEW SUPPLEMENTAL REPLY AND DECLARATIONS	1.90

F E E S

Date	Attorney	Description	Hours	
		FILED BY FORESTERS (.4) MEMO FROM/TO COUNSEL TO PROSPECTIVE PURCHASER (.1)		
03/01/22	IMH	PREPARE FOR FIRST DAY HEARINGS INCLUDING WORK ON AND REVISIONS TO SCRIPT AND STRATEGIZE FOR PRESENTATION IN FRONT OF JUDGE FINE (2.6) ; ANALYSIS OF MATERIALS RELATED TO WEBSITE AND DISCUSSIONS REGARDING SAME (1.2); DISCUSSIONS WITH CLERK'S OFFICE REGARDING ADDING MOTION TO EXTEND TIME FOR TAKING DEPOSITION TO FIRST DAYS (.2); STRATEGIZE REGARDING RESPONSE TO GIELINSKY AND SIMILARLY SITUATED POTENTIAL CLAIMANTS AND DETERMINATION OF NEXT STEPS (.3); TEAM DISCUSSIONS REGARDING ORCHESTRATION FOR 3/2 COURT PRESENTATION (.5); REVISE PROPOSED ORDERS FOR 3/1 HEARINGS (.3)	5.10	
03/01/22	CC	WORK ON PROPOSED ORDERS FOR FIRST DAY MOTIONS SCHEDULED TO BE HEARD ON 3/2/2022.	1.50	
03/01/22	CC	FINALIZE AND E-FILE AGREED MOTION FOR EXTENSION OF TIME TO EXAMINE ASSIGNORS.	0.30	
03/01/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF HEARING ON MOTION FOR EXTENSION OF TIME TO EXAMINE ASSIGNORS (CRYSTAL CRUISES) AND CROSS-NOTICE OF HEARING RE FIRST DAY HEARINGS (CRYSTAL HOLDINGS AND CRYSTAL AIRCRUISES).	0.80	
03/01/22	CC	WORK ON FIRST DAY HEARINGS E-BINDER.	1.00	
03/01/22	CC	WORK ON CRYSTAL CRUISE ASSIGNMENT WEBSITE PAGE.	1.50	
03/01/22	CC	WORK ON FIRST DAY HEARING SCRIPT.	1.40	
03/01/22	MXD	REMOTE ONLINE NOTARIZATION OF THE AFFIDAVIT OF MARK C. HEALY; EMAILS AND TELEPHONE CONFERENCE REGARDING SAME [.5 NO CHARGE]	0.00	N/C
03/01/22	SJC	PREPARE FOR AND ATTEND ZOOM CONFERENCE WITH COUNSEL FOR CREDITOR WITH DEPOSIT CLAIM AND P MASCIA AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (.8); REVIEW AND REVISE HEARING OUTLINE IN CONNECTION WITH ALL FIRST DAY HEARINGS AS WELL AS EMERGENCY MOTION FOR TEMPORARY INJUNCTION AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING SAME, AND PREPARE FOR HEARING (2.5); FINALIZE AND FILE RESPONSE IN OPPOSITION TO FORESTERS MOTION FOR TEMPORARY INJUNCTION AND AFFIDAVIT, COMMUNICATIONS WITH TEAM AND COUNSEL FOR	7.50	

F E E S

Date	Attorney	Description	Hours
		FORESTERS REGARDING SAME, AND REVIEW SUPPLEMENT FROM FORESTERS AND COMMUNICATIONS REGARDING SAME, AND RESEARCH IN CONNECTION WITH SAME (2.0); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND COCOUNSEL REGARDING VARIOUS CASE MATTERS INCLUDING FIRST DAY HEARINGS, SCRIPT FOR SAME, BACKGROUND INFORMATION, FORESTERS DEMAND, AND RELATED MATTERS (1.1); REVIEW PROPOSED WEBSITE REVISIONS AND COMMUNICATIONS REGARDING SAME (.4); REVIEW DRAFT PROPOSED ORDERS ON ALL FIRST DAY FILINGS AND COMMUNICATIONS WITH TEAM REGARDING SAME (.5); REVIEW AND FILE CROSS-NOTICE OF HEARING ON FIRST DAYS IN RELATED CASES AND NOTICE OF HEARING ON MOTION TO EXTEND DEADLINE TO CONDUCT ASSIGNOR EXAM (.2)	
03/02/22	PSS	PREPARE FOR MATTERS SET FOR HEARING 3/2 AND REVISE HEARING OUTLINE AND REVIEW DECLARATIONS AND EXHIBITS FILED BY FORESTERS (2.4) HEARING ON MATTERS SET (1.3) DEBRIEF WITH M. HEALY AFTER COURT (.2)	3.90
03/02/22	IMH	REVIEW FILING BY G FREEDMAN (.2); FINAL PREPARATION FOR FIRST DAY HEARINGS INCLUDING REVISIONS TO SCRIPT AND MATERIALS IN SUPPORT OF SAME AND NUMEROUS DISCUSSIONS WITH HEALY AND TEAM (3.8); PARTICIPATE IN SAME (1.3); POST-COURT CALL WITH HEALY AND TEAM REGARDING OPEN ISSUES AND NEXT STEPS (.2); REVISE FIRST DAY ORDERS (.3); PREPARE ORDER ON FORESTER'S MOTION (.4); ATTN TO ISSUES RELATED TO CONSOLIDATION MOTION AND ORDER AND FORM OF CAPTION FOR CASE (.2)	6.40
03/02/22	CC	WORK ON PROPOSED ORDERS RESULTING FROM 3/2/2022 FIRST DAY HEARINGS.	2.50
03/02/22	CC	CONFER WITH I. HOMER AND S. CAPUANO RE FIRST DAY SCRIPT; WORK ON FIRST DAY SCRIPT.	1.50
03/02/22	CC	UPDATE FIRST DAY HEARING BINDER TO INCLUDE FORESTERS' RECENTLY FILED SUPPLEMENT, AFFIDAVITS AND EXHIBIT REGISTER.	0.60
03/02/22	CC	PREPARE ORDER ON FORESTERS' EMERGENCY MOTION FOR TEMPORARY INJUNCTION.	0.40
03/02/22	CC	ATTEND FIRST DAY HEARINGS.	0.50
03/02/22	CC	CONFER WITH I. HOMER (VARIOUS) RE DELIVERABLES POST-HEARING.	1.00

F E E S

Date	Attorney	Description	Hours
03/02/22	CC	PREPARE MATERIALS FOR FIRST DAY HEARINGS.	0.60
03/02/22	SJC	PREPARE FOR AND ATTEND FIRST DAY HEARINGS AND HEARING ON FORESTERS EMERGENCY MOTION FOR TEMPORARY INJUNCTION, CONFERENCE CALLS AND EMAILS AND MEETINGS WITH TEAM, COCOUNSEL, AND ASSIGNEE IN CONNECTION WITH SAME (4.0); REVIEW FILINGS OF DECLARATIONS AND EXHIBITS BY FORESTERS IN ADVANCE OF HEARING (.8); REVIEW, REVISE, AND CIRCULATE DRAFT ORDERS ON ALL MATTERS HEARD IN FIRST DAY HEARINGS AND FORESTERS AND COMMUNICATIONS WITH TEAM AND COCOUNSEL REGARDING SAME (1.0); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, AND COCOUNSEL IN CONNECTION WITH FIRST DAY HEARINGS AND FORESTERS MATTER, NOTICE OF ASSIGNMENT, WEBSITE, AND OTHER MATTERS (1.2); REVIEW NOTICES OF FURTHER HEARING WITH FORESTERS (.1).	7.10
03/03/22	PSS	MEMO FROM/TO COUNSEL TO FORESTERS AND TELEPHONE CONFERENCE WITH FORESTERS (.4) IOC I HOMER RE FOLLOW UP FROM HEARINGS AND ORDERS (.3)	0.70
03/03/22	IMH	FURTHER ANALYSIS OF LOCAL RULES REGARDING REVISIONS TO CONSOLIDATION ORDER AND WORDING FOR FUTURE PLEADINGS (.8); DISCUSSION WITH A DONNER REGARDING HELLMANN WORLDWIDE LOGISTICS AND POTENTIAL CLAIM OF SAME (.6); FOLLOW UP MEMO REGARDING SAME (.2); REVISE ORDER ON FORESTERS' MOTION FOR INJUNCTION (.3); TEAM EMAILS REGARDING SAME (.2); REVIEW CURRENT WEBSITE AND PROVIDE FINAL SUGGESTIONS FOR SAME (.4); EMAILS WITH MOECKER'S OFFICE REGARDING SERVICE ISSUES RELATED TO ENTRY OF COURT'S ORDERS (.2)	2.70
03/03/22	CC	WORK ON NOTICE OF ASSIGNMENT.	0.40
03/03/22	CC	CONFER WITH P. SINGERMAN, I. HOMER AND S. CAPUANO (VARIOUS) RE ORDER GRANTING MOTION TO CONSOLIDATE AND JOINTLY ADMINISTER CASES.	0.30
03/03/22	CC	UPDATE TASK LIST.	0.40
03/03/22	CC	FINALIZE AND UPLOAD INTO COURTMAP ORDERS RESULTING FROM 3/2/2022 HEARING IN CRYSTAL CRUISES, CRYSTAL HOLDINGS AND CRYSTAL AIRCRUISES.	1.70
03/03/22	SJC	COMMUNICATIONS WITH COUNSEL FOR ALLIANZ AND TEAM REGARDING DEMAND AND RELATED	2.00

F E E S

Date	Attorney	Description	Hours
		MATTERS AND REVIEW DATA FROM ALLIANZ (.8); COMMUNICATIONS WITH TEAM REGARDING FINALIZING AND SUBMITTING ORDERS ON FIRST DAY MATTERS AND RELATED MATTERS (1.2)	
03/04/22	IMH	EMAILS WITH M HEALY REGARDING DETAILS FOR TRUST ACCOUNT SUBJECT OF COURT'S RULING (.2); COMMUNICATE WITH M HEALY AND TEAM REGARDING INFORMATION ON WEB PAGE (.3); REVISE STATUS REPORT FOR 3/8 TEAM CALL (.3);	0.80
03/04/22	CC	UPDATE TASK LIST.	0.30
03/04/22	CC	REVIEW WEBSITE; CORRESPOND WITH S. CAPUANO AND I. HOMER RE COMPONENTS NECESSARY FOR UPDATING.	0.30
03/04/22	SJC	COMMUNICATIONS WITH BERMUDA COUNSEL REGARDING RETENTION ISSUES (.2); COMMUNICATIONS WITH TEAM REGARDING VARIOUS CASE ISSUES INCLUDING ASSIGNOR EXAMINATION, PROCEDURAL ISSUES, AND FORESTERS ORDER (.8)	1.00
03/06/22	SJC	COMMUNICATIONS WITH G FREEDMAN AND TEAM REGARDING PROPOSED ORDER ON FORESTERS MOTION	0.30
03/07/22	PSS	REVIEW UPDATED ROLLING TASK LIST (.2) STATUS AND STRATEGY CALL WITH M. HEALY AND TEAM (1.0)	1.20
03/07/22	IMH	TEAM DISCUSSION TO UPDATE WORKING TASK LIST AND PREPARE FOR TODAY'S STANDING CALL (.7); NUMEROUS CALLS WITH BERGER SINGERMAN TEAM AND MOECKER'S OFFICE TO FINALIZE SERVICE ISSUES AND DISCUSS UPCOMING DEADLINES (.6); REVIEW ADDITIONAL MATERIALS FOR WEB PAGE AND FOLLOW UP WITH MOECKER'S OFFICE REGARDING SAME (.4); REVIEW COURT'S PROCEDURES AS THEY RELATE TO CASE MANAGEMENT HEARINGS (.2); EMAILS REGARDING MOTION TO STRIKE FORESTERS MOTION (.2); PARTICIPATE IN STANDING TEAM CALL (1.2);; ATTN TO FOLLOW UP ISSUES (.1); PREPARE MEMO REGARDING SAME (.2); REVIEW MATERIALS FOR DEPOSITION OF ASSIGNOR (.3); REVISE TERMS OF BERMUDA COUNSEL ENGAGEMENT LETTER (.1); STRATEGIZE REGARDING MAIN ARGUMENT OF MOTION TO STRIKE FORESTERS MOTION, AND REVISE PROPERTY OF THE ESTATE ANALYSIS (.5)	4.50
03/07/22	CC	UPDATE TASK LIST AND CIRCULATE FOR TEAM STATUS CALL.	0.60

F E E S

Date	Attorney	Description	Hours
03/07/22	CC	WORK ON OUTLINE OF EXAMINATION OF ASSIGNOR.	1.30
03/07/22	CC	ATTEND TEAM STATUS CALL.	1.00
03/07/22	CC	ATTEND INTEROFFICE CONFERENCE CALL WITH S. CAPUANO AND I. HOMER.	0.40
03/07/22	CC	REVIEW OF CONFLICT SEARCH RESULTS FOR POTENTIAL DISCLOSURES IN CONNECTION WITH BSLLP RETENTION APPLICATION.	1.00
03/07/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING VARIOUS CASE ISSUES INCLUDING FORESTERS ORDER AND MOTION TO STRIKE, LEASE ISSUES, COMMUNICATIONS WITH CREDITORS, NOTICE OF ASSIGNMENT, IP ISSUES, ASSIGNOR EXAMINATION, WEBSITE, AND OTHER MATTERS (4.0); REVIEW AND REVISE NOTICE OF ASSIGNMENT (.3); REVIEW ALL ORDERS ENTERED ON FIRST DAY MATTERS (.3); EMAIL COMMUNICATIONS WITH PROSPECTIVE COUNSEL IN BERMUDA REGARDING ENGAGEMENT TERMS AND WORK ON RETENTION MOTION (.6); REVISE COMMUNICATIONS TO CREDITORS (.5).	5.70
03/08/22	PSS	REVIEW AND REVISE NOTICE LETTER TO CREDITORS AND MEMO TO S. CAPUANO RE SAME AND REVIEW REVISED ORDER AND MEMO FROM COUNSEL TO FORESTERS RE SAME (.6)	0.60
03/08/22	IMH	ATTN TO EMPLOYMENT ISSUES RELATED TO PROSPECTIVE BERMUDA COUNSEL AND REACH OUT TO SECOND OPTION FOR REPRESENTATION (.4); RESEARCH REGARDING COMMUNICATION WITH TRAVEL AGENTS AND CONSUMERS (.7); ANALYSIS IN SUPPORT OF REVISED TERMS TO ORDER DENYING FORESTER MOTION AND STRATEGIZE REGARDING MOTION TO STRIKE (.4); REVIEW TODAY'S NEW FILINGS AND EMAILS WITH TEAM REGARDING SAME (.2);	1.70
03/08/22	CC	FINALIZE AND E-FILE NOTICE OF ASSIGNMENT FOR THE BENEFIT OF CREDITORS.	0.30
03/08/22	CC	FINALIZE AND E-FILE NOTICE OF EXAMINATION OF ASSIGNORS.	0.30
03/08/22	CC	REVIEW OF CONFLICT SEARCH RESULTS FOR POTENTIAL DISCLOSURES IN CONNECTION WITH BSLLP RETENTION APPLICATION.	0.50
03/08/22	CC	REVISE PROPOSED ORDER ON FORESTERS' MOTION FOR TEMPORARY INJUNCTION.	0.20
03/08/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS	4.70

F E E S

Date	Attorney	Description	Hours
		WITH ASSIGNEE AND TEAM REGARDING VARIOUS CASE ISSUES INCLUDING FORESTERS ORDER AND MOTION TO STRIKE, WEBSITE, ACCOUNTING MATTERS, COMMUNICATIONS WITH CREDITORS, IP ISSUES, RETENTION OF FOREIGN COUNSEL, AND OTHER MATTERS (1.2); EMAIL COMMUNICATIONS WITH PROSPECTIVE COUNSEL IN BERMUDA REGARDING ENGAGEMENT TERMS, FINALIZE MOTION TO EMPLOY AND CIRCULATE SAME (.6); REVIEW MOTIONS TO EMPLOY SPECIAL COUNSEL AND CIRCULATE PROPOSED REVISIONS TO SAME (.6); FINALIZE DRAFT FORESTERS ORDER AND CIRCULATE TO OPPOSING COUNSEL, COMMUNICATIONS WITH OPPOSING COUNSEL, AND REVIEW AND DISCUSS PROPOSED REVISIONS WITH OPPOSING COUNSEL (1.1); FINALIZE AND FILE NOTICE OF ASSIGNMENT AND NOTICE OF EXAMINATION (.7); DRAFT LANGUAGE FOR COMMUNICATIONS WITH CREDITORS (.5).	
03/09/22	IMH	REVIEW PROFESSIONAL INVOICES FROM FEBRUARY FOR FEE APPLICATION TO BE SUBMITTED (.3); FOLLOW UP WITH SECOND BACK UP CHOICE FOR COUNSEL IN BERMUDA TO MONITOR GENTING PROCEEDINGS (.2); REVIEW MATERIALS REGARDING POTENTIAL NEED FOR ADDITIONAL DISCLOSURES IN CONNECTION WITH RETENTION OF PROFESSIONALS (.5); TEAM DISCUSSION REGARDING AMENDMENT TO SCHEDULES FOR LITIGATION CLAIMS (.2); PREPARE SCRIPT FOR INCOMING CREDITOR INQUIRIES (.4); PREPARE GENERAL CLAIM FORM TO ADDRESS CREDITOR INQUIRIES (.5)	2.10
03/09/22	CC	FINALIZE AND E-FILE MOTION TO EMPLOY KENNEDYS AS BERMUDA COUNSEL TO ASSIGNEE.	0.30
03/09/22	CC	PREPARE CONTACT TRACKING CHART; CONFER WITH VARIOUS CONSUMERS/CREDITORS RE QUESTIONS ON CLAIMS.	0.80
03/09/22	CC	COMPLETE REVIEW OF CONFLICT SEARCH RESULTS RE ADDITIONAL DISCLOSURES IN CONNECTION WITH BSLLP RETENTION APPLICATION, IF ANY.	1.50
03/09/22	CC	CONFER WITH N. JOSEPH OF MOECKER RE CONSUMER EMAIL BLAST; REVIEW CONSUMER EMAIL BLAST.	0.20
03/09/22	CC	FINALIZE AND SUBMIT THROUGH COURTMAP PROPOSED ORDER ON FORESTERS' EMERGENCY MOTION FOR TEMPORARY INJUNCTION.	0.30
03/09/22	CC	UPDATE TASK LIST.	0.30
03/09/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS	2.10

F E E S

Date	Attorney	Description	Hours
		WITH ASSIGNEE, COCOUNSEL AND TEAM REGARDING VARIOUS CASE ISSUES INCLUDING BOND ISSUES, CREDITOR INQUIRIES, WEBSITE, RETENTION APPLICATIONS FOR SPECIAL COUNSEL, (1.0); FINALIZE AND FILE MOTION TO EMPLOY BERMUDA COUNSEL AND COMMUNICATIONS REGARDING SAME (.4); FINALIZE AND SUBMIT FORESTERS ORDER (.1); ATTEND TO VARIOUS CREDITOR INQUIRIES (.6).	
03/10/22	PSS	STATUS AND STRATEGY CALL WITH M. HEALY AND TEAM RE OPEN ISSUES (1.1)	1.10
03/10/22	IMH	PREPARE FOR (.3); AND PARTICIPATE (1.1) IN STANDING TEAM CALL INCLUDING M HEALY; FOLLOW UP COMMUNICATIONS WITH NARDELLA TEAM (.1); REVIEW LOCAL RULES REGARDING EFFECTIVENESS OF RETENTION OF LOCAL COUNSEL AND ANALYSIS OF NEED FOR HEARING ON SAME (.3)	1.80
03/10/22	CC	ATTEND TEAM STATUS CALL.	1.00
03/10/22	CC	ATTEND TO VARIOUS CALLS AND EMAILS RE QUESTIONS FROM CONSUMERS/CREDITORS.	0.80
03/10/22	CC	UPDATE CONTACT TRACKING CHART.	0.40
03/10/22	CC	UPDATE AND CIRCULATE TASK LIST FOR TEAM STATUS CALL.	0.40
03/10/22	CC	CONFER WITH OUELLETTE & MAULDIN RE SCHEDULING COURT REPORTER FOR EXAMINATION OF ASSIGNORS ON 3/28/2022.	0.20
03/10/22	CC	REVIEW ASSIGNEE'S BONDS RECEIVED FROM MARK HEALY.	0.20
03/10/22	CC	REVIEW BSLLP INVOICE.	0.40
03/10/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, COCOUNSEL AND TEAM REGARDING VARIOUS CASE ISSUES INCLUDING WEBSITE, CREDITOR INQUIRIES, LANDLORD ISSUES, RETENTION APPLICATIONS FOR SPECIAL COUNSEL, TRAVEL INSURANCE COMPANY DEMANDS, BERMUDA LEGAL ISSUES, AND OTHER CASE MANAGEMENT ISSUES (3.0); CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH COUNSEL FOR EMPLOYEE CLAIMANT AND COMMUNICATIONS WITH TEAM REGARDING SAME (.3); CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH COUNSEL FOR EXCLUSIVE RESORTS AND COMMUNICATIONS WITH TEAM REGARDING SAME (.4); REVIEW ORDER ENTERED ON FORESTERS MOTION (.1); EMAIL COMMUNICATIONS WITH BERMUDA COUNSEL (.1);	3.90

F E E S

Date	Attorney	Description	Hours
03/11/22	IMH	ATTN TO WEBSITE ISSUES AND WORK WITH MOECKER'S OFFICE TO REVISE VARIOUS ITEMS ON WEB PAGE (.5); DISCUSSION WITH PROSPECTIVE BERMUDA COUNSEL ON LIMITATIONS OF WHAT CAN BE DISCLOSED OR DISCOVERED IN GENTING CASE (.2); RESEARCH REGARDING [REDACTED] (1.1)	1.80
03/11/22	CC	CONFER WITH VARIOUS CREDITORS; UPDATE CONTACT TRACKING CHART.	0.80
03/11/22	CC	UPDATE TASK LIST.	0.40
03/11/22	CC	PREPARE NOTICE OF FILING PROOFS OF PUBLICATION OF NOTICES OF ASSIGNMENT FOR THE BENEFIT OF CREDITORS.	0.30
03/11/22	CC	PREPARE NOTICE OF FILING BONDS OF ASSIGNEE.	0.30
03/11/22	CC	CONFER WITH K. BURNS RE FILING ORIGINAL BONDS WITH CLERK OF COURT.	0.20
03/11/22	CC	CORRESPOND WITH N. MILES (BERMUDA COUNSEL) RE OBTAINING COPY OF THE DOCKET SHEET IN GENTING HONG KONG WINDING DOWN PROCEEDING.	0.20
03/14/22	PSS	INTEROFFICE CONFERENCE S. CAPUANO RE STATUS AND OPEN ISSUES AND CALL WITH BERMUDA COUNSEL (.2) TEAM CALL RE TASK LIST AND OPEN ISSUES (.6) BEGIN REVIEW OF FISERV/FIRST DATA AGREEMENTS (.3)	1.10
03/14/22	IMH	REVIEW MATERIALS FOR ASSIGNOR EXAMINATION (.9); PREPARE FOR STANDING TEAM CALL INCLUDING UPDATES TO ROLLING TASK LIST (.4); PARTICIPATE IN SAME (.4); EMAILS WITH N MILES REGARDING STATUS OF BERMUDA GENTING PROCEEDINGS (.2);	1.90
03/14/22	GL	FOLLOW UP WITH CLIENT TEAM REGARDING TRADEMARK LICENSE AGREEMENT AND IP STRUCTURE.	0.30
03/14/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING VARIOUS CASE ISSUES INCLUDING ASSETS IN FOREIGN JURISDICTIONS, LEASE AND DEPOSIT ISSUES, ASSIGNOR EXAMINATION, WEBSITE, RETENTION APPLICATIONS AND HEARING, AND OTHER MATTERS (2.1); BEGIN REVIEW OF CREDIT CARD AGREEMENTS AND RELATED DOCUMENTS AND COMMUNICATIONS WITH CORPORATE COUNSEL REGARDING CREDIT CARD MATTERS AND CONSUMER DEPOSITS (.8).	2.90
03/15/22	PSS	INTEROFFICE CONFERENCE I HOMER RE STATUS AND	0.80

F E E S

Date	Attorney	Description	Hours
		OPEN ISSUES (.2) MEMOS FROM/TO S. CAPUANO RE DEPOSITION OF ASSIGNOR AND PREP (.2) CALL WITH PROSPECTIVE BERMUDA COUNSEL (.4)	
03/15/22	IMH	REVIEW DOCUMENTS REGARDING POTENTIAL ESTATE RECOVERIES FROM CREDIT CARD COMPANIES AND STRATEGIZE REGARDING SAME (.6); ANALYSIS OF DOCUMENTS REGARDING POTENTIAL CLAIMS BY THE ESTATE AGAINST GENTING ENTITIES (.5); REVIEW FILES AND PROVIDE MATERIALS TO BE USED IN ASSIGNOR DEPOSITION (.5); TEAM CALL WITH N MILES REGARDING GENTING CASES AND OPEN ISSUES RELATED TO RETENTION (.4); EMAILS WITH A DONNER REGARDING UPCOMING DEPOSITION OF ASSIGNOR (.2)	2.20
03/15/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING VARIOUS CASE ISSUES INCLUDING CREDITOR DEMANDS, ASSIGNOR EXAMINATION, AND OTHER MATTERS (.9); PREPARE FOR AND ATTEND CONFERENCE CALL WITH COUNSEL FOR ALLIANZ REGARDING DEMAND AND RELATED ISSUES, AND COMMUNICATIONS WITH TEAM REGARDING SAME (.9); PREPARE FOR AND ATTEND CONFERENCE CALL WITH COUNSEL FOR C BRIER REGARDING PENDING LITIGATION, INSURANCE, AND RELATED ISSUES, AND COMMUNICATIONS WITH TEAM REGARDING SAME, AND REVIEW DOCUMENTS FROM COUNSEL (1.1); PREPARE FOR AND ATTEND CONFERENCE CALL WITH BERMUDA COUNSEL REGARDING GENTING LIQUIDATION PROCEEDINGS AND RELATED MATTERS AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.0); REVIEW AND REVISE OUTLINE OF EXAMINATION OF ASSIGNOR AND RESEARCH IN CONNECTION WITH SAME (1.8); REVIEW AND FINALIZE NOTICE OF FILING BONDS AND NOTICE OF AFFIDAVITS OF SERVICE (.3); REVIEW DOCUMENTS FROM ASSIGNOR INCLUDING CERTAIN INSURANCE POLICIES (.6); COMMUNICATIONS WITH BERMUDA COUNSEL REGARDING GENTING LIQUIDATION (.2).	6.80
03/16/22	IMH	RESEARCH REGARDING PROPERTY OF THE ESTATE AS IT APPLIES IN AN ASSIGNMENT CASE AND FOR UPCOMING CONTESTED MATTER AGAINST G FREEDMAN (.8); PREPARE FOR NEXT MOTION CALENDAR INCLUDING REMAINING RETENTION APPLICATIONS AND CASE MANAGEMENT HEARING (.6); REVIEW ADDITIONAL DOCUMENTS FROM ASSIGNOR TO INCLUDE IN OUTLINE FOR STATUTORY EXAMINATION (.9); REVIEW AND REVISE BERGER SINGERMAN INVOICE TO M HEALY (.2)	2.50

F E E S

Date	Attorney	Description	Hours
03/16/22	CC	UPDATE TASK LIST.	0.60
03/16/22	CC	ADDRESS VARIOUS CREDITOR CALLS AND EMAILS; UPDATE CONTACT TRACKING CHART.	1.20
03/16/22	CC	CONFER WITH DEANNE DIAZ OF THE JUDGE CHAMBERS RE SETTING HEARING ON EMPLOYMENT APPLICATIONS; PREPARE, FINALIZE AND E-FILE NOTICE OF HEARING (MOTION CALENDAR) FOR EMPLOYMENT APPLICATIONS; UPLOAD NOTICE OF HEARING AND EMPLOYMENT APPLICATIONS IN COURTMAP.	1.00
03/16/22	CC	FINALIZE AND E-FILE NOTICE OF FILING BONDS OF ASSIGNEE.	0.40
03/16/22	CC	CONFER AND CORRESPOND WITH N. JOSEPH (VARIOUS) RE AFFIDAVITS OF SERVICE OF NOTICE OF ASSIGNMENT AND PROOF OF CLAIM FORM.	0.40
03/16/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF FILING AFFIDAVITS OF SERVICE OF NOTICE OF ASSIGNMENT AND PROOF OF CLAIM FORM.	0.80
03/16/22	CC	PREPARE FORM OF NON-DISCLOSURE AND CONFIDENTIALITY AGREEMENT.	0.60
03/16/22	CC	REVIEW NARDELLA & NARDELLA INVOICES.	0.80
03/16/22	GL	ANALYZE TRADEMARK-RELATED DOCUMENTS RECOVERED FROM COMPANY SERVER.	0.50
03/16/22	SJC	BEGIN DRAFTING MOTION TO STRIKE FORESTERS MOTION FOR TEMPORARY INJUNCTION AND LEGAL RESEARCH REGARDING SAME (1.4); REVIEW AND REVISE OUTLINE OF EXAMINATION OF ASSIGNOR AND RESEARCH IN CONNECTION WITH SAME, AND CIRCULATE SAME (2.7); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE'S TEAM AND TEAM REGARDING VARIOUS CASE ISSUES INCLUDING FOREIGN ASSET COLLECTION, INTELLECTUAL PROPERTY MATTERS, ASSIGNOR EXAMINATION PREPARATION, HEARINGS, FEE APPLICATIONS, AND OTHER MATTERS (1.1); REVIEW LEGAL AND ORGANIZATIONAL DOCUMENTS FROM ASSIGNOR (.6); REVIEW, REVISE, AND CIRCULATE DRAFT NDA OR POTENTIAL PURCHASERS (.7); REVIEW NOTICE OF HEARING FOR FILING ON RETENTION APPLICATIONS (.1).	6.60
03/17/22	IMH	REVISE WORKING TASK LIST (.2); PARTICIPATE IN TEAM DISCUSSIONS REGARDING 3/23 STATUS CONFERENCE AND FOLLOW UP REGARDING ADDITION OF NEWLY FILED MOTIONS TO SAME (.6); RESEARCH IN SUPPORT OF MOTION TO STRIKE (.9)	1.70

F E E S

Date	Attorney	Description	Hours
03/17/22	CC	PREPARE NOTICE OF HEARING ON MOTION TO EMPLOY PARRIS WHITTAKER AS BAHAMAS COUNSEL TO ASSIGNEE.	0.40
03/17/22	CC	CONFER WITH VARIOUS CREDITORS; UPDATE CONTACT TRACKING CHART.	0.60
03/17/22	CC	CORRESPOND WITH K. COOPER, S. CAPUANO AND I. HOMER RE SETTING THE MOTION TO EMPLOY BAHAMAS COUNSEL FOR HEARING ON 3/23.	0.30
03/17/22	SJC	CONTINUE WORKING ON MOTION TO STRIKE FORESTERS MOTION FOR TEMPORARY INJUNCTION, LEGAL RESEARCH REGARDING SAME, AND COMMUNICATIONS AND CONFERENCES WITH TEAM REGARDING SAME (3.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE'S TEAM AND TEAM REGARDING VARIOUS CASE ISSUES INCLUDING DOCUMENT PRODUCTION, COMPANY FINANCIALS, UPCOMING HEARINGS, AND OTHER MATTERS (.8); REVIEW CORRECTED NOTICE OF HEARING RETENTION APPLICATIONS, COMMUNICATIONS REGARDING SETTING HEARING ON SAME, REVIEW MOTION TO RETAIN BAHAMAS COUNSEL AND COMMUNICATIONS REGARDING SETTING HEARING ON SAME (.6).	4.90
03/18/22	PSS	COMPLETE REVIEW OF AND REVISIONS TO MOTION TO STRIKE AND MEMO TO S. CAPUANO RE SAME (.6) MEMOS FROM/TO S. CAPUANO RE MIAMI LANDLORD ISSUES AND PROPOSE REVISIONS TO THE RESPONSE (.2)	0.80
03/18/22	IMH	FOLLOW UP LEGAL ANALYSIS IN SUPPORT OF MOTION TO STRIKE (.9); REVIEW DOCUMENTS NEEDED FOR POTENTIAL BUYERS AND COMMUNICATE WITH MOECKER TEAM REGARDING SAME (.4); DISCUSSION WITH CLERK'S OFFICE REGARDING ADDITIONAL MATTERS TO BE SET ON COURT'S CALENDAR FOR 3/23 (.2); TEAM EMAILS REGARDING SAME (.2); FOLLOW UP WITH HEALY'S TEAM REGARDING RESPONSES TO CREDITOR INQUIRIES (.2); STRATEGIZE WITH TEAM REGARDING ADDITIONAL EXAMINATION TOPICS FOR ASSIGNOR DEPOSITION (.3); ATTN TO EMERGENCY ISSUES RESULTING FROM LANDLORD SEEKING TO SECURE CRYSTAL BUILDING, INCLUDING NUMEROUS EMAILS WITH P VON KAHLE AND TEAM AND DISCUSSIONS REGARDING NEXT STEPS (.8)	3.00
03/18/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF FILING	0.40

F E E S

Date	Attorney	Description	Hours
		AFFIDAVIT OF SERVICE OF NOTICE OF ASSIGNMENT AND PROOF OF CLAIM FORM FOR CRYSTAL AIRCRUISES CREDITORS.	
03/18/22	CC	PREPARE MOTION TO CONTINUE TO CONDUCT BUSINESS FOR 90 DAYS AND PROPOSED FORM OF ORDER.	0.80
03/18/22	CC	UPDATE TASK LIST.	0.30
03/18/22	CC	ADDRESS VARIOUS CREDITOR CALLS AND EMAILS.	0.60
03/18/22	CC	FINALIZE AND E-FILE NOTICE OF HEARING ON MOTION CALENDAR OF MOTION TO EMPLOY PARRIS WHITTAKER.	0.40
03/18/22	CC	CONFER WITH DEANNE DIAZ RE SETTING ON MOTION CALENDAR MOTION TO EMPLOY PARRIS WHITTAKER; CONFER WITH S. CAPUANO RE SAME.	0.20
03/18/22	CC	UPLOAD SUPPORTING DOCUMENTS INTO COURTMAP RE MOTION TO EMPLOY PARRIS WHITTAKER.	0.40
03/18/22	CC	ATTEND TO LOGISTICS REGARDING EXAMINATION OF ASSIGNORS ON 3/28/2022 IN WEST PALM BEACH OFFICE.	0.30
03/18/22	CC	PREPARE E-BINDER FOR HEARINGS ON 3/23/2022 (MOTION CALENDAR).	0.80
03/18/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, ASSIGNEE'S TEAM, AND TEAM REGARDING CUSTOMER DEPOSITS ISSUES, LEASE ISSUES, DEMANDS, ASSET AND SALE ISSUES, FOREIGN PROCEEDINGS, (1.5); PREPARE FOR AND ATTEND MEET AND CONFER CALL WITH G FREEDMAN REGARDING FORESTERS MATTER, CONTINUATION OF BUSINESS, AND COMMUNICATIONS WITH TEAM REGARDING SAME (.5); COMMUNICATIONS WITH COUNSEL AND REPRESENTATIVES FOR GENTING LIQUIDATOR REGARDING SALE ISSUES, CONFIDENTIALITY, AND OTHER MATTERS AND REVIEW DRAFT NDA (.6); REVIEW PROPOSED CHANGES TO MOTION TO STRIKE FORESTERS MOTION, CONTINUE WORKING ON SAME, FINALIZE AND CIRCULATE SAME TO CLIENT AND TEAM AND COMMUNICATIONS REGARDING SAME (1.4); FINALIZE AND CIRCULATE TO TEAM DRAFT ASSIGNOR EXAMINATION OUTLINE AND COMMUNICATIONS REGARDING SAME (1.6); REVIEW NOTICES OF HEARING AND AFFIDAVITS OF SERVICE FOR FILING (.2).	5.80
03/20/22	IMH	PREPARE FOR 3/21 TEAM CALL (.5)	0.50

F E E S

Date	Attorney	Description	Hours
03/21/22	PSS	MEMOS FROM/TO S. CAPUANO RE STATUS, MIAMI LANDLORD ISSUES AND AMEX (.3) STATUS AND STRATEGY CALL WITH M. HEALY AND NARDELLA TEAM (.5) MEMOS FROM/TO ROBERT MILLER, COUNSEL FOR CREDITOR (.1)	0.90
03/21/22	IMH	REVISE OUTLINE FOR ASSIGNOR EXAM (.2); REVIEW ADDITIONAL DOCUMENTS RELATED TO SAME (.3); PARTICIPATE IN STANDING TEAM CALL (.9)	1.40
03/21/22	CC	CONFER WITH VARIOUS CREDITORS; UPDATE CONTACT TRACKING CHART.	0.50
03/21/22	CC	WORK ON OUTLINE OF EXAMINATION OF ASSIGNOR.	1.20
03/21/22	CC	PREPARE E-BINDER FOR EXAMINATION OF ASSIGNOR.	0.80
03/21/22	CC	ATTEND TEAM STATUS CALL.	1.00
03/21/22	CC	UPDATE TASK LIST FOR TEAM STATUS CALL; CONFER WITH I. HOMER AND S. CAPUANO RE SAME.	0.40
03/21/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING HEARINGS ON RETENTION APPLICATIONS, BERMUDA PROCEEDINGS, ASSIGNOR EXAMINATION PREPARATION AND RELATED ISSUES, LEASE AND LANDLORD ISSUES, CONSUMER DEPOSITS, CREDIT CARD COMPANY ISSUES, CREDITOR INQUIRIES, AND OTHER CASE MATTERS (1.7); CONTINUE REVISING ASSIGNOR EXAMINATION OUTLINE AND INCORPORATE PROPOSED REVISIONS, AND CIRCULATE TO ASSIGNEE (.6); COMMUNICATIONS WITH COUNSEL FOR GENTING REGARDING CONFIDENTIALITY MATTERS (.2); COMMUNICATIONS WITH CREDITOR REGARDING CLAIM ISSUES (.3); RESEARCH IN CONNECTION WITH ASSIGNOR EXAMINATION (.5).	3.30
03/22/22	PSS	MEMOS FROM/TO COUNSEL FOR CREDITORS RE STATUS OF CLAIMS AND TF CREDITOR OF CRYSTAL AND MEMO TO C. CRUZ RE SAME (.2)	0.20
03/22/22	IMH	PREPARE EMAIL TO H CONTOS REGARDING INQUIRY OF ASSIGNEE (.2); 11TH CIRCUIT RESEARCH IN SUPPORT OF REVISED ARGUMENTS IN MOTION TO STRIKE (.9); WORK ON MOTION TO CONTINUE BUSINESS OF ASSIGNOR (.4) COMMUNICATE WITH CREDITORS AND COUNSEL REGARDING UPCOMING HEARINGS, PROCEDURES AND INFORMATION ON WEBPAGE (.3); PROVIDE ADDITIONAL INSERTS TO AND QUESTIONS FOR ASSIGNOR DEPOSITION OUTLINE AND STRATEGIZE REGARDING PROCEDURE	2.40

F E E S

Date	Attorney	Description	Hours
		FOR CREDITORS ATTENDING SAME (.4); EMAILS WITH A DONNER REGARDING HELLMANN WORLDWIDE INVENTORY AND RENT ISSUES (.2)	
03/22/22	CC	FINALIZE AND E-FILE ASSIGNEE'S MOTION TO STRIKE FORESTERS MOTION FOR TEMPORARY INJUNCTION.	0.40
03/22/22	CC	INITIAL REVIEW OF FISERV DOCUMENTS RE ISSUES RELATED TO USE OF CREDIT RESERVE.	0.50
03/22/22	CC	UPDATE E-BINDER FOR HEARINGS ON MARCH 23, 2022.	0.50
03/22/22	CC	CONFER WITHY VARIOUS CREDITORS; UPDATE CONTACT TRACKING CHART.	0.40
03/22/22	CC	PREPARE ASSIGNEE'S MOTION TO CONTINUE CONDUCTING BUSINESS OF ASSIGNOR FOR 90 DAYS.	0.80
03/22/22	CC	WORK WITH IT RE FIRM'S BLOCKING OF CRYSTAL CRUISES ASSIGNMENT WEBSITE.	0.30
03/22/22	CC	WORK ON OUTLINE FOR EXAMINATION OF ASSIGNORS AND E-BINDER FOR SAME.	1.00
03/22/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE AND ASSIGNEE'S TEAM REGARDING ASSIGNOR EXAMINATION PREPARATION, HEARINGS ON RETENTION APPLICATIONS, SALE EFFORTS AND ISSUES WITH ASSETS HELD BY THIRD PARTIES, BERMUDA PROCEEDINGS, CREDITOR INQUIRIES, AND CONSUMER DEPOSIT ISSUES (1.3); COMMUNICATIONS WITH ASSIGNOR REPRESENTATIVE REGARDING DOCUMENT PRODUCTION (.2); REVISE AND CIRCULATE MOTION TO CONTINUE OPERATIONS OF ASSIGNORS AND DRAFT ORDER AND COMMUNICATIONS WITH TEAM REGARDING SAME (.7); FINALIZE AND FILE MOTION TO STRIKE MOTION FOR TEMPORARY INJUNCTION AND COMMUNICATIONS WITH TEAM AND COCOUNSEL REGARDING SAME (.8); COMMUNICATIONS WITH BERMUDA COUNSEL REGARDING BERMUDA INSOLVENCY PROCEEDINGS AND RETENTION APPLICATIONS (.2); REVIEW DOCUMENTS FROM ASSIGNOR INCLUDING CREDIT CARD AND PROCESSOR RELATED DOCUMENTS AND PREPARE MEMO REGARDING SAME AND CIRCULATE DRAFT OF SAME TO TEAM (3.0); COMMUNICATIONS WITH CREDITOR REGARDING STATUS OF ASSIGNOR FUNDS (.2); COMMUNICATIONS WITH CREDITOR REGARDING ASSIGNOR EXAMINATION (.2).	6.60
03/23/22	PSS	PREPARE FOR HEARING ON 3/23 ON RETENTIONS OF	0.40

F E E S

Date	Attorney	Description	Hours
		SPECIAL COUNSEL AND MEMO TO CLIENT RE SAME (.4)	
03/23/22	IMH	PREPARE FOR TODAY'S COURT PRESENTATION AND STATUS UPDATE (.5); TEAM EMAILS REGARDING NEXT STEPS REGARDING AMEX ANALYSIS (.2); ; CALL WITH A DONNER'S OFFICE REGARDING CLIENT COMMUNICATION WITH HELLMAN (.2); EMAILS WITH COUNSEL REGARDING NEXT STEPS (.2); EMAILS WITH P VON KAHLE AND M HEALY REGARDING SAME (.2); REVISE ORDERS GRANTING MOTIONS TO EMPLOY LOCAL COUNSEL (.2); DISCUSSION WITH OFFICE OF BERMUDA COUNSEL REGARDING SAME (.1); TEAM EMAILS REGARDING NEXT STEPS FOR VARIOUS SPECIAL COUNSEL (.2)	1.80
03/23/22	CC	PREPARE ORDERS RESULTING FROM MARCH 23, 2022 HEARING ON EMPLOYMENT APPLICATIONS OF LOSEY, PLLC, PHELPS DUNBAR, LLP, PARRIS WHITTAKER AND KENNEDYS CHUDLEIGH LTD.	1.20
03/23/22	CC	UPDATE TASK LIST.	0.30
03/23/22	CC	PREPARE FOR EXAMINATION OF ASSIGNORS ON MARCH 28, 2022.	0.80
03/23/22	SJC	CONFERENCE CALL WITH TEAM AND COCOUNSEL REGARDING RETENTION APPLICATION HEARINGS AND OTHER CASE MATTERS	0.80
03/24/22	PSS	MEMO TO/FROM M. HEALY RE MIAMI OFFICE LEASE (.1)	0.10
03/24/22	IMH	REVISE ROLLING TASK LIST FOR TODAY'S STANDING TEAM CALL (.2); PREPARE FOR SAME (.4); PARTICIPATE IN SAME (1); MEMO REGARDING OPEN ISSUES AND ATTN TO MATTERS REQUIRING ATTENTION IN THE NEXT FEW DAYS (.4); ADD ADDITIONAL LINE OF QUESTIONING TO ASSIGNOR EXAM OUTLINE FOR BELGIUM LITIGATION (.4); DISCUSSION WITH A DONNER REGARDING HELLMAN INVENTORY AND NEXT STEPS (.2)	2.60
03/24/22	CC	ATTEND TEAM STATUS CALL.	1.00
03/24/22	CC	UPDATE AND CIRCULATE TASK LIST.	0.40
03/24/22	CC	FINALIZE AND UPLOAD PROPOSED ORDERS THROUGH COURTMAP RE MOTIONS TO EMPLOY PROFESSIONALS (PHELPS DUNBAR, LOSEY, PARRIS WHITTAKER AND KENNEDYS CHUDLEIGH).	1.00
03/24/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING VARIOUS CASE MATTERS INCLUDING CREDIT CARD AND	2.80

F E E S

Date	Attorney	Description	Hours
		PROCESSOR RESERVES, LANDLORD AND LEASE ISSUES, HEARINGS, ASSIGNOR EXAMINATION, AND OTHER CASE MATTERS (2.2); FINALIZE AND FILE MOTION TO CONTINUE ASSIGNOR BUSINESS AND COMMUNICATIONS WITH TEAM REGARDING SAME (.3); REVIEW ORDERS ON FOUR RETENTION APPLICATIONS AND COMMUNICATIONS WITH TEAM REGARDING SUBMITTING SAME (.3).	
03/25/22	PSS	MEMOS FROM/TO S. CAPUANO AND TEL CONFERENCE WITH S. CAPUANO RE EXAMINATION OF ASSIGNOR (.3) TEL CONFERENCE WITH S. CAPUANO AND M. HEALY RE EXAMINATION OF ASSIGNOR (.5) MEMO FROM/TO M. RAYMOND RE EXAMINATION OF ASSIGNOR (.1)	0.90
03/25/22	IMH	STRATEGIZE REGARDING TOPICS FOR ASSIGNOR EXAMINATION (.3); EMAILS WITH ASSIGNEE TEAM REGARDING WAREHOUSED GOODS AND NEXT STEPS FOR RESOLVING SAME (.2); REVISE AND FINALIZE MOTION FOR ASSIGNOR TO CONTINUE BUSINESS (.2); ATTN TO INQUIRIES RELATED TO ORDERS GRANTING EMPLOYMENT OF SPECIAL COUNSEL (.2); ATTN TO ISSUES REGARDING MATTERS TO BE HEARD ON NEGATIVE NOTICE (.2)	1.10
03/25/22	CC	ATTEND TO VARIOUS CREDITOR CALLS.	0.50
03/25/22	CC	FINALIZE AND E-FILE MOTION FOR AUTHORITY TO CONDUCT BUSINESS FOR AN ADDITIONAL 90 DAYS; SERVE SAME TO CBL44.	0.30
03/25/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING ASSIGNOR EXAMINATION AND PREPARATION, ESTATE CLAIMS, PROFESSIONAL ISSUES, MEDIA, AND THE CONTINUATION OF ASSIGNOR BUSINESS (1.2); CONTINUE PREPARATION FOR EXAMINATION (1.5); COMMUNICATIONS WITH COUNSEL FOR CREDITORS REGARDING ASSIGNOR EXAM AND OTHER ISSUES (.3)	3.00
03/28/22	PSS	REVIEW COMMENTS TO QUESTION SET AND MEMO TO S. CAPUANO RE SAME; PARTICIPATE IN PART OF EXAMINATION OF ASSIGNOR DEBRIEF WITH M. HEALY AND TEAM AFTER EXAMINATION (.6)	0.60
03/28/22	IMH	COMMUNICATE WITH CREDITORS REGARDING TODAY'S ASSIGNOR EXAMINATION (.2); DISCUSSIONS WITH INTERNAL TEAM, ASSIGNEE AND HIS TEAM IN PREPARATION FOR STATUTORY DEPOSITION, POTENTIAL SETTLEMENT OF LANDLORD PURCHASE AGREEMENT AND VARIOUS OPEN ISSUES RELATED TO CREDITOR CONCERNS (1.6); DISCUSSION WITH M HEALY REGARDING TIMEFRAME FOR CONTINUING	5.10

F E E S

Date	Attorney	Description	Hours
		BUSINESS (.2); EMAILS WITH A DONNER REGARDING GOODS AT HELLMAN PREMISES (.2); ATTEND DEPOSITION OF RICARDO CELORIO (3.2); MEETING WITH CREDITOR REPRESENTATIVES REGARDING PLAN FOR CONSUMER DEPOSITS (.2); POST-DEPOSITION TEAM MEETING WITH M HEALY, NARDELLA TEAM AND BERGER SINGERMAN TEAM (.5)	
03/28/22	CC	CONFER WITH VARIOUS CREDITORS; UPDATE CONTACT TRACKING CHART.	0.50
03/28/22	CC	CONFER WITH I. HOMER AND S. CAPUANO RE OUTLINE FOR EXAMINATION OF ASSIGNOR.	0.20
03/28/22	CC	WORK ON OUTLINE OF EXAMINATION OF ASSIGNOR.	0.60
03/28/22	CC	UPDATE TASK LIST.	0.30
03/28/22	GL	FOLLOW UP REVIEW OF LIST OF TRADEMARKS AND SEARCH OF COMPANY RECORDS. COMMUNICATE WITH CO-COUNSEL REGARDING SAME.	0.50
03/28/22	SJC	PREPARE FOR AND CONDUCT EXAMINATION OF ASSIGNOR, MEETINGS AND CONFERENCES WITH TEAM AND ASSIGNEE'S COUNSEL REGARDING SAME, DISCUSSIONS WITH CREDITORS' COUNSEL AND ASSIGNOR'S COUNSEL REGARDING SAME (5.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING EXAMINATION AND RELATED MATTERS, BERMUDA ISSUES, INTELLECTUAL PROPERTY MATTERS, AND OTHER CASE MATTERS (1.0).	6.50
03/29/22	IMH	TELEPHONE CALL WITH A DONNER REGARDING STATUS OF INVENTORY REVIEW FOR HELLMAN (.2); DISCUSSION WITH MOECKER'S OFFICE REGARDING ADDITIONAL DOCUMENTS RELATED TO IP ISSUES (.2); TEAM DISCUSSIONS REGARDING PREPARATION FOR FIRST CASE MANAGEMENT CONFERENCE (.3); ANALYSIS IN SUPPORT OF HEARING ON MOTION TO STRIKE FORESTERS' MOTION (.3)	1.00
03/29/22	SJC	PREPARE MEMO TO BERMUDA COUNSEL REGARDING BACKGROUND AND SUPPORT FOR ASSIGNEE PETITION IN BERMUDA PROCEEDINGS, AND REVIEW MEMO FROM BERMUDA COUNSEL (1.2); REVIEW DOCUMENTS AND HAVE CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING HEARING ON MOTIONS TO STRIKE, LEASE AND LANDLORD ISSUES, CASE MANAGEMENT REPORT AND HEARING, AND OTHER CASE ISSUES (.6).	1.80
03/30/22	IMH	WORK ON CASE MANAGEMENT REPORT (.8);	1.50

F E E S

Date	Attorney	Description	Hours
		STRATEGIZE REGARDING OPENING FOR 4/6 HEARING AND PREPARE OVERVIEW COMMENTS FOR THE COURT (.4); STRATEGIZE REGARDING OPEN ISSUES RELATED TO ANALYSIS OF AMEX DOCUMENTS AND DEBRIEF ABOUT THE DISCUSSION WITH HEALY (.3)	
03/30/22	CC	PREPARE INITIAL CASE MANAGEMENT REPORT.	1.50
03/30/22	CC	UPDATE TASK LIST.	0.40
03/30/22	CC	FINALIZE AND E-FILE NOTICE OF FILING PROOFS OF PUBLICATION OF NOTICES OF ASSIGNMENT.	0.40
03/30/22	SJC	CONFERENCE CALL WITH CREDITOR'S COUNSEL REGARDING CLAIMS PROCESS AND STATUS OF CASE (.2); MEETING WITH I HOMER REGARDING VARIOUS CASE MATTERS INCLUDING CASE MANAGEMENT REPORT AND CONFERENCE, HEARING ON MOTION TO STRIKE, AND OTHER MATTERS (.3); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CREDIT CARD RESERVE ISSUES, TRAVEL AGENCIES, ASSET SALE ISSUES, PROOF OF CLAIM ISSUES, EXAMINATION, AND OTHER CASE ISSUES (1.8); REVIEW CREDIT CARD AGREEMENTS AND AGREEMENTS WITH VENDORS AS WELL AS CORPORATE GOVERNANCE DOCUMENTS (1.0); COMMUNICATIONS WITH A WERNICK AND ASSIGNEE REGARDING REQUEST FOR INFORMATION (.2); REVIEW NOTICE OF FILING OF PUBLICATION AND ATTACHMENTS FOR FILING AND COMMUNICATIONS REGARDING SAME (.2); COMMUNICATIONS WITH BERMUDA COUNSEL REGARDING RETENTION AND APPEARANCE ISSUES (.2); REVIEW ORDERS ENTERED ON RETENTION APPLICATIONS (.2); REVISE AND CIRCULATE MEMO REGARDING CREDIT CARD ISSUES (.4)	4.50
03/31/22	PSS	MEMO FROM/TO M. RAYMOND AND TEL CONFERENCE WITH M. RAYMAND RE ADJOURNMENT OF HEARING ON MOTION TO STRIKE FORESTER'S MOTION AND IOC S. CAPUANO RE SAME (.2) MEMO FROM/TO M. RAYMOND AND TEL CONFERENCE WITH M. RAYMAND RE ADJOURNMENT OF HEARING ON MOTION TO STRIKE FORESTER'S MOTION AND IOC S. CAPUANO RE SAME (.2)	0.20
03/31/22	IMH	INTERNAL TEAM CALLS TO DISCUSS OPEN ISSUES AND PREPARE FOR STANDING CALL WITH M HEALY (1.1); STRATEGIZE REGARDING ADDITIONAL DOCUMENTS FOR FISERV(.2); ATTN TO ADDITIONAL LISTINGS TO RUN FOR DISCLOSURE PURPOSES FOR PROFESSIONALS (.2); EMAILS REGARDING LATEST INQUIRY FROM HELLMAN REPRESENTATIVE (.1);	2.70

F E E S

Date	Attorney	Description	Hours
		REVISE ORDER RESETTING HEARING ON MOTION TO STRIKE (.1); PARTICIPATE IN STANDING TEAM CALL (1)	
03/31/22	CC	WORK ON DRAFT OF INITIAL CASE MANAGEMENT REPORT.	0.40
03/31/22	CC	ATTEND TEAM STATUS CALL.	1.30
03/31/22	CC	CONFER WITH I. HOMER AND S. CAPUANO RE STATUS OF DELIVERABLES AND CASE.	0.40
03/31/22	CC	UPDATE TASK LIST FOR TEAM STATUS MEETING.	0.30
03/31/22	SJC	CONFERENCE CALLS, MEETINGS, AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CONSUMER CREDIT CARD RESERVE ISSUES, CONTINUANCE OF HEARING ON MOTION TO STRIKE, EMPLOYEE LITIGATION, INSURANCE ISSUES, RETENTION MATTERS, CREDITOR DEMANDS, ASSET SALES, INTELLECTUAL PROPERTY ISSUES, CASE MANAGEMENT CONFERENCE, LANDLORD AND LEASE ISSUES, ASSET SALE ISSUES, AND OTHER CASE MATTERS, AND REVIEW DOCUMENTATION IN CONNECTION WITH SAME (3.8); CONFERENCE CALL WITH A NEWMAN REGARDING CASE STATUS (.2); REVIEW AND REVISE PROPOSED ORDER ON EXTENSION OF DEADLINE FOR FORESTERS TO RESPOND TO MOTION TO STRIKE AND CONTINUANCE OF HEARING AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING SAME (.7); COMMUNICATIONS WITH CREDITORS REGARDING CASE STATUS (.4).	5.10
04/01/22	IMH	EMAILS REGARDING STATUS OF REVIEW OF DOCUMENTS RELATED TO IP ISSUES (.2); TEAM DISCUSSIONS REGARDING ADDITIONAL DOCUMENTS RELATED TO FISERV AND AMEX (.2); FOLLOW UP WITH COURT REGARDING UPCOMING HEARINGS AND CASE MANAGEMENT CONFERENCE (.2)	0.60
04/01/22	CC	CONFER WITH VARIOUS CREDITORS AND UPDATE CONTACT TRACKING CHART.	0.40
04/01/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING INTELLECTUAL PROPERTY ISSUES, CONTINUED HEARING ON MOTION TO STRIKE, AND OTHER CASE MATTERS (.5); COMMUNICATIONS WITH CREDITOR REGARDING CASE STATUS (.3); CONTINUE REVIEW OF DOCUMENTS FROM ASSIGNOR IN CONNECTION WITH CREDIT CARD RESERVE AND OTHER CONSUMER ISSUES (1.0)	1.80

F E E S

Date	Attorney	Description	Hours
04/04/22	PSS	CALL WITH ASSIGNEE AND CO-COUNSEL RE STATUS AND OPEN ISSUES (1.0)	1.00
04/04/22	IMH	REVISE TASK LIST AND COMMUNICATE WITH NARDELLA TEAM AND MOECKER GROUP IN ADVANCE OF TODAY'S STANDING CALL REGARDING OPEN CREDITOR ISSUES AND PENDING MATTERS TO BE HEARD BY JUDGE FINE(.6); PARTICIPATE IN SAME AND REVIEW OPEN CREDITOR INQUIRIES (1.2); EMAILS WITH A DONNER REGARDING INVENTORY REQUEST (.2)	2.00
04/04/22	CC	ATTEND TEAM STATUS CALL.	1.00
04/04/22	CC	UPDATE TASK LIST FOR TEAM STATUS CALL.	0.20
04/04/22	CC	CONFER WITH VARIOUS CREDITORS AND UPDATE CONTACT TRACKING CHART.	0.30
04/04/22	SJC	CONFERENCE CALLS, MEETINGS, AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING LANDLORD AND LEASE ISSUES, CREDITOR CLAIMS, RETENTION APPLICATIONS, CASE MANAGEMENT REPORT, ASSET RECOVERIES, EMPLOYEE LITIGATION, FORESTERS MATTER, AND OTHER CASE MATTERS (1.5); COMMUNICATIONS WITH COUNSEL FOR CREDITOR REGARDING INSURANCE ISSUES (.2); REVIEW DRAFT INITIAL CASE MANAGEMENT REPORT AND BEGIN MAKING REVISIONS TO SAME (.4)	2.10
04/05/22	IMH	STRATEGIZE REGARDING DOCUMENTS TO BE PROVIDED TO POTENTIAL BUYERS AND DISCUSS EMAIL REQUESTS FOR SAME (.4); EMAILS WITH M HEALY REGARDING INVENTORY INSPECTION (.1)	0.50
04/05/22	CC	REVIEW FISERVE AGREEMENTS RE RESERVE ACCOUNT.	0.60
04/05/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING RETENTION APPLICATION, SALE RELATED MATTERS, BERMUDA APPLICATION, AND OTHER CASE MATTERS (.8); COMMUNICATIONS WITH ASSIGNEE'S TEAM REGARDING INSURANCE ISSUES (.5); REVIEW PROPOSED REVISIONS FROM COUNSEL FOR GENTING LIQUIDATORS TO NDA AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (.7).	2.00
04/06/22	IMH	FOLLOW UP WITH PROFESSIONALS REGARDING MARCH INVOICES AND ATTN TO MONTHLY ADMINISTRATIVE MATTERS (.4); STRATEGIZE REGARDING TIMING FOR FILING FEE APPS (.2) TEAM CALL REGARDING REPLY IN SUPPORT OF MOTION TO	1.90

F E E S

Date	Attorney	Description	Hours
		STRIKE AND ANALYSIS REGARDING SAME (.8); REVISE SAME (.3); FOLLOW UP REGARDING CREDITOR INQUIRY (HORACE) (.2)	
04/06/22	CC	UPDATE TASK LIST.	0.40
04/06/22	CC	FINALIZE AND E-FILE MOTION TO APPROVE EMPLOYMENT OF BAST AMRON AS SPECIAL COUNSEL TO ASSIGNEE.	0.50
04/06/22	CC	SEARCH FOR AND REVIEW COMPLAINTS FILED AGAINST CRYSTAL CRUISES POST-PETITION; RESEARCH SERVICE ISSUES.	0.40
04/06/22	SJC	REVIEW AND ANALYZE FORESTERS RESPONSE TO MOTION TO STRIKE AND CONFERENCE CALLS AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (1.0); DRAFT AND CIRCULATE REPLY IN SUPPORT OF MOTION TO STRIKE AND COMMUNICATIONS WITH TEAM REGARDING SAME AND PROPOSED REVISIONS TO SAME, AND RESEARCH IN CONNECTION WITH SAME (1.6); PREPARE FOR AND ATTEND CONFERENCE WITH BERMUDA COUNSEL REGARDING BERMUDA PROCEEDINGS, APPLICATION FOR ACCESS TO COURT FILE AND FOR RECOGNITION OF FOREIGN INSOLVENCY REPRESENTATIVE, AND OTHER MATTERS (1.0); REVIEW COMPLAINT FILED BY FORESTERS AND COMMUNICATIONS WITH ASSIGNEE, TEAM, AND FORESTERS REGARDING SAME (.8); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING BERMUDA INSOLVENCY MATTERS, CREDIT CARD AGREEMENTS, AND OTHER CASE MATTERS (.5).	4.90
04/07/22	PSS	MEMO FROM/TO I HOMER RE FORESTER'S COMPLAINT AND REPLY TO RESPONSE TO MOTION TO STRIKE (.1)	0.10
04/07/22	IMH	TEAM DISCUSSIONS REGARDING FORESTERS COMPLAINT AND STRATEGY FOR REVISING ARGUMENT IN SUPPORT OF MOTION TO STRIKE; REVISE SAME (.7); INTERNAL TEAM CALL REGARDING OPEN ISSUES, REVISIONS TO TASK LIST AND STATUS OF MATTERS TO BE HEARD BY JUDGE FINE (.5); REVISE BAST AMRON RETENTION APPLICATION (.2); PREPARE TRANSFER MOTION FOR FORESTER COMPLAINT PENDING BEFORE HANZMAN (.2); PREPARE MOTION TO ABATE SAME (.3)	2.10
04/07/22	CC	REVIEW FISERV AGREEMENTS AND PREPARE MEMO RE SAME.	2.50
04/07/22	CC	CONFER WITH CREDITORS AND UPDATED CONTACT TRACKING CHART.	0.30

F E E S

Date	Attorney	Description	Hours
04/07/22	CC	ATTEND TEAM STATUS CALL.	0.60
04/07/22	SJC	MAKE FURTHER REVISIONS TO REPLY AND CIRCULATE TO CLIENT, AND COMMUNICATIONS REGARDING SAME, AND BRIEF RESEARCH REGARDING ISSUES RELATING TO COMPLAINT (1.2); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING FORESTERS MATTERS, CASE MANAGEMENT REPORT, RETENTION APPLICATION, CREDIT CARD RESERVE MATTERS, AND OTHER CASE MATTERS (.9); COMMUNICATIONS WITH VARIOUS CREDITORS REGARDING CLAIMS ISSUES (.5); COMMUNICATIONS WITH COUNSEL FOR GENTING LIQUIDATORS REGARDING SALE EFFORTS (.2)	2.80
04/08/22	PSS	MEMOS FROM/TO S. CAPUANO RE DRAFT OF REPLY TO FORESTERS' RESPONSE TO MOTION TO STRIKE (.1)	0.10
04/08/22	IMH	REVIEW MATERIALS REGARDING CEYHAN LITIGATION (.2); STRATEGIZE REGARDING DOCUMENTS POTENTIALLY RELATED TO CRYSTAL RIVER NL COOP (.3); REVISE PROPOSED ORDER APPROVING RETENTION OF BAST AMRON(.2); EMAILS REGARDING IP DOCUMENTS (.2); REVISE TASK LIST FOR TEAM (.2); EMAILS REGARDING HEARING ON MOTION TO STRIKE FORESTERS' MOTION (.2); REVISE REPLY IN SUPPORT OF MOTION TO STRIKE (.2)	1.50
04/08/22	CC	WORK ON MEMO RE REVIEW OF FISERV AGREEMENTS.	1.20
04/08/22	CC	UPDATE TASK LIST TO INCLUDE NEW COMPLAINTS FILED AGAINST CRYSTAL CRUISES.	0.20
04/08/22	CC	PREPARE MOTION TO APPROVE EMPLOYMENT OF BAST AMRON AS SPECIAL COUNSEL TO ASSIGNEE AND PROPOSED FORM OF ORDER.	0.60
04/08/22	SJC	COMMUNICATIONS WITH DUTCH BANKRUPTCY TRUSTEE FOR RIVER BOAT ENTITY AND ASSIGNEE REGARDING NEW INSOLVENCY PROCEEDING AND REQUESTS FOR DATA (.4); CONFERENCE CALLS AND COMMUNICATIONS WITH TEAM AND COCOUNSEL REGARDING FORESTERS COMPLAINT AND REPLY TO MOTION TO STRIKE, RETENTION APPLICATIONS, FISERV AND AMEX MATTERS, INTELLECTUAL PROPERTY ISSUES, AND OTHER CASE MATTERS (1.1); CONTINUE REVISING FORESTERS REPLY (.4); COMMUNICATIONS WITH CREDITORS REGARDING CASE STATUS (.2).	2.10
04/11/22	PSS	REVIEW AND REVISE REPLY TO RESPONSE TO FORESTERS MOTION TO STRIKE AND MEMO TO TEAM	1.40

F E E S

Date	Attorney	Description	Hours
		RE SAME (.4) CALL WITH M. HEALY AND TEAM RE OPEN ISSUES AND STATUS AND STRATEGY (1.0)	
04/11/22	IMH	PREPARE FOR STANDING TEAM CALL INCLUDINGS REVISIONS TO TASK LIST, EMAILS REGARDING STATUS AND CONFER WITH COURT'S CLERK REGARDING UPCOMING HEARINGS (.8); PARTICIPATE IN SAME (1.1); PREPARE FOR CASE MANAGEMENT HEARING (.6); EMAILS WITH A DONNER REGARDING DEPOSITION OF ASSIGNOR (.1); EMAILS REGARDING POTENTIAL PURCHASER FOR HELLMAN INVENTORY (.2); PREPARE FOR HEARING ON MOTION TO STRIKE FORESTERS MOTION INCLUDING DISCUSSIONS ABOUT SETTING THE MATTER ON MOTION CALENDARL INSTEAD OF SPECIAL SET (.4); STRATEGIZE REGARDING UPCOMING DEPOSITIONS IN NETHERLANDS (.2); ATTN TO TRANSFER OF PENDING CASES BEFORE JUDGE HANZMAN AND NON-BUSINESS COURT JUDGE (.3); REVIEW CONSTRUCTIVE TRUST LAW ASSERT BY BARESOVA WITH RESPECT TO STARBOARD HOLDINGS (.8)	4.50
04/11/22	CC	ATTEND TEAM STATUS CALL.	1.00
04/11/22	CC	UPDATE TASK LIST FOR TEAM STATUS CALL.	0.40
04/11/22	CC	REVIEW N&N INVOICES FOR MARCH 2022.	0.40
04/11/22	CC	FINALIZE AND E-FILE ASSIGNEE'S REPLY IN SUPPORT OF MOTION TO STRIKE FORESTERS MOTION FOR TEMPORARY INJUNCTION	0.40
04/11/22	SJC	FINALIZE AND FILE REPLY IN SUPPORT OF MOTION TO STRIKE FORESTERS MOTION FOR TEMPORARY INJUNCTION, AND REVIEW COMMENTS AND REVISIONS FROM P SINGERMAN IN CONNECTION WITH SAME (.5); MEETINGS, CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING INSURANCE ISSUES, DUTCH BANKRUPTCY ISSUES, FORESTERS MATTERS, INITIAL CASE MANAGEMENT REPORT, AND OTHER CASE MATTERS (1.8); CONTINUE REVISING INITIAL CASE MANAGEMENT REPORT AND CIRCULATE SAME TO TEAM AND ASSIGNEE FOR REVIEW (1.0); COMMUNICATIONS WITH CREDITOR REGARDING DUTCH LEGAL PROCEEDINGS (.2); COMMUNICATIONS WITH B AMRON REGARDING RETENTION (.2). REVIEW AND ANALYZE DEMAND FROM STARBOARD, BRIEF LEGAL RESEARCH IN CONNECTION WITH SAME, AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (.9); COMMUNICATIONS REGARDING NDAS (.2); COMMUNICATIONS WITH COUNSEL FOR IDAIR (.2).	5.00

F E E S

Date	Attorney	Description	Hours
04/12/22	PSS	MEMOS FROM I HOMER AND S. CAPUANO RE STATUS AND OPEN ISSUES (.2)	0.20
04/12/22	IMH	RESEARCH REGARDING RULES AND PARAMETERS FOR MOTION TO TRANSFER PENDING COMPLAINTS (.4); STRATEGIZE REGARDING DISPOSITION OF SEAMAN'S COMPLAINT (.2); RESEARCH AND ANALYSIS REGARDING POTENTIAL RES JUDICATA EFFECT OF JUDGMENT (1.2); DISCUSSION WITH HEALY'S OFFICE REGARDING CLAIMS PROCESS INCLUDING TIMING OF CLAIM OBJECTIONS (.2); EMAILS REGARDING REVIEW OF DOCUMENTS RELATED TO TRADEMARKS (.1); ANALYSIS OF STATUTE REGARDING AUCTION PROCEDURES (.2); COMMUNICATE WITH ASSIGNEE REGARDING SCOPE OF SERVICE OF SALE NOTICE, CASE MANAGEMENT ORDER AND STATUS OF DOCUMENTS POSTED ON ASSIGNEE'S WEBSITE (.3)	2.60
04/12/22	CC	PREPARE NOTICE OF HEARING (MOTION CALENDAR) RE MOTION TO STRIKE FORESTERS' EMERGENCY MOTION FOR TEMPORARY INJUNCTION AND MOTION TO EMPLOY BAST AMRON AS SPECIAL COUNSEL TO ASSIGNEE.	0.30
04/12/22	CC	PREPARE NOTICE OF AUCTION SALE.	0.40
04/12/22	CC	PREPARE NOTICE OF PENDENCY OF ASSIGNMENT FOR THE BENEFIT OF CREDITORS FOR 3 STATE COURT ACTIONS.	0.60
04/12/22	CC	FINALIZE AND E-FILE MOTION TO EMPLOY BAST AMRON AS SPECIAL COUNSEL TO ASSIGNEE.	0.30
04/12/22	CC	UPDATE TASK LIST.	0.30
04/12/22	CC	WORK ON INITIAL CASE MANAGEMENT REPORT.	0.60
04/12/22	SJC	CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH COUNSEL FOR CREDITOR IDAIR REGARDING CASE STATUS AND RELATED MATTERS (.5); FINALIZE AND FILE RETENTION MOTION FOR BAST AMRON (.4); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH E PENZ, COUNSEL IN BERMUDA REGARDING BERMUDA PROCEEDINGS (.6); EMAIL COMMUNICATIONS WITH SEVERAL INTERESTED PARTIES REGARDING NDAS AND CIRCULATE DRAFTS OF SAME, AND COMMUNICATIONS REGARDING SAME WITH ASSIGNEE AND TEAM (.9); COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING SCHEDULING OF HEARING ON MOTION TO STRIKE (.3); COMMUNICATIONS WITH COUNSEL FOR CREDITOR PLAINTIFF IN CALIFORNIA REGARDING INSURANCE MATTERS (.2); REVISE	5.40

F E E S

Date	Attorney	Description	Hours
		NOTICE OF AUCTION SAME AND RESEARCH IN CONNECTION WITH SAME (.5); CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH D GRAMMES REGARDING STATUS OF CASE AND LITIGATION (.6); COMMUNICATIONS WITH M LANDEN, COUNSEL FOR PLAINTIFF IN NEW LITIGATION, REGARDING CASE STATUS (.2); COMMUNICATIONS WITH COUNSEL FOR DUTCH PLAINTIFF (.2); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING INITIAL CASE MANAGEMENT REPORT, INTELLECTUAL PROPERTY, DEMAND REGARDING RETAIL STORES, INSURANCE MATTERS, SERVICE OF PLEADINGS, AND OTHER CASE MATTERS (1.0)	
04/13/22	PSS	MEMO FROM COUNSEL TO DUTCH BANKRUPTCY TRUSTEE (.2) MEMOS FROM/TO S. CAPUANO AND I HOMER RE FOLLOW UP FROM STATUS CALL (.1)	0.30
04/13/22	IMH	STRATEGIZE REGARDING PROCEDURES FOR HANDLING SUPPLEMENTAL LITIGATION AND MINIMIZING COSTS ASSOCIATED WITH SAME (.3); REVIEW DOCUMENTS REGARDING ADDITIONAL ITEMS/DATA TO ADD TO CASE MANAGEMENT REPORT (.9); REVISE ROLLING TEAM TASK LIST (.2); EMAILS WITH CREDITORS' COUNSEL REGARDING TRANSCRIPT OF R CELORIO (.2); TEAM STRATEGY SESSION REGARDING IP ISSUES (.3)	1.90
04/13/22	CC	FINALIZE AND E-FILE NOTICE OF AUCTION SALE.	0.30
04/13/22	CC	PREPARE E-BINDER FOR HEARING ON APRIL 22, 2022.	1.00
04/13/22	CC	FINALIZE AND E-FILE NOTICE OF HEARING ON MOTION TO STRIKE FORESTERS' EMERGENCY MOTION FOR TEMPORARY INJUNCTION AND MOTION TO EMPLOY BAST AMRON AS SPECIAL COUNSEL TO ASSIGNEE.	0.40
04/13/22	CC	SCHEDULE AND UPLOAD SUPPORTING DOCUMENTS FOR APRIL 22, 2022 HEARING IN COURTMAP.	0.40
04/13/22	CC	WORK ON NOTICES OF PENDENCY OF ASSIGNMENT FOR THE BENEFIT OF CREDITORS.	0.30
04/13/22	CC	REVIEW AND TRACK FULLY-EXECUTED NON-DISCLOSURE AGREEMENTS.	0.20
04/13/22	CC	CONFER WITH VARIOUS CREDITORS AND UPDATE CONTACT TRACKING CHART.	0.30
04/13/22	GL	COMMUNICATION WITH CO-COUNSEL AND ASSIGNEE REGARDING IP ISSUES. ANALYZE SAME.	0.50
04/13/22	SJC	REVIEW PROPOSED REVISIONS TO NDAS FROM	3.80

F E E S

Date	Attorney	Description	Hours
		VARIOUS INTERESTED PARTIES IN CONNECTION WITH SHIP SALE AND COMMUNICATIONS WITH COUNSEL FOR INTERESTED PARTIES AND ASSIGNEE REGARDING SAME AND RELATED MATTERS (1.0); FINALIZE AND FILE NOTICE OF AUCTION SALE AND COMMUNICATIONS WITH TEAM AND ASSIGNEE'S REGARDING SAME AND SERVICE OF SAME (.4); COMMUNICATIONS WITH COUNSEL FOR ICELAND CREDITORS AND ASSIGNEE REGARDING CASE ISSUES (.2); FINALIZE AND CIRCULATE NOTICE OF PENDENCY OF ABC CASES FOR FILING IN POST-PETITION LITIGATION AND COMMUNICATIONS WITH TEAM REGARDING SAME (.4); REVISE INITIAL CASE MANAGEMENT REPORT AND CIRCULATE TO TEAM FOR REVIEW, AND COMMUNICATIONS REGARDING SAME (.4); COMMUNICATIONS WITH DUTCH BANKRUPTCY TRUSTEE REGARDING PROCEEDINGS (.2); FINALIZE AND FILE NOTICE OF HEARING ON MOTION TO STRIKE AND MOTION TO EMPLOY BAST AMRON AND COMMUNICATIONS REGARDING SAME (.3); COMMUNICATIONS WITH COUNSEL FOR DUTCH BANKRUPTCY TRUSTEE REGARDING DUTCH PROCEEDING (.2); COMMUNICATIONS WITH COUNSEL FOR DUTCH PLAINTIFF REGARDING SEPARATE DUTCH PROCEEDING (.2); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING BERMUDA PROCEEDINGS, SALE EFFORTS, INTELLECTUAL PROPERTY ISSUES, NDAS, AND OTHER CASE MATTERS (.5).	
04/14/22	IMH	DISCUSSIONS WITH ASSIGNEE REGARDING DOCUMENTS RELEVANT TO IP ANALYSIS (.4); TEAM DISCUSSIONS WITH G LOTTENBERG REGARDING SAME, INCLUDING SUGGESTIONS FOR STREAMLINING ANALYSIS RELATED TO LICENSING ISSUES (.4); LEGAL RESEARCH AND PREPARATION FOR 4/22 COURT HEARING AND STATUS CONFERENCE (1)	1.80
04/14/22	CC	WORK ON FINALIZE AND E-FILE INITIAL CASE MANAGEMENT REPORT.	0.40
04/14/22	CC	UPDATE TASK LIST.	0.30
04/14/22	GL	CALL WITH MARK RE: TRADEMARK ISSUES AND FOLLOW UP WITH INTERNAL TEAM REGARDING SAME.	1.00
04/14/22	SJC	COMMUNICATIONS WITH ASSIGNEE AND PROSPECTIVE PURCHASERS REGARDING NDA FORMS AND PROPOSED REVISIONS (.3); FINALIZE AND FILE INITIAL CASE MANAGEMENT REPORT AND COMMUNICATIONS WITH TEAM REGARDING SAME	1.00

F E E S

Date	Attorney	Description	Hours
		(.3); ZOOM CONFERENCE WITH TEAM REGARDING INTELLECTUAL PROPERTY MATTERS (.4)	
04/15/22	IMH	REVIEW OF AUCTION ITEMS AND LEGAL ANALYSIS RELATED TO NOTICE AND DISCLOSURES FOR PERSONAL ITEMS TO BE SOLD (.6); REVISE ROLLING TASK LIST (.2); COMMUNICATE WITH ASSIGNEE PROFESSIONALS REGARDING UPCOMING AUCTION AND COURT HEARINGS (.4)	1.20
04/15/22	CC	UPDATE TASK LIST.	0.30
04/15/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF FILING AFFIDAVIT OF MAILING OF MOTION TO EXTEND TIME TO CONDUCT BUSINESS AND MOTION TO EMPLOY BAST AMRON.	0.40
04/15/22	CC	CONFER WITH I. HOMER AND S. CAPUANO RE STATUS AND OUTSTANDING DELIVERABLES.	0.30
04/15/22	CC	CONFER WITH VARIOUS CREDITORS AND UPDATE CONTACT TRACKING CHART.	0.30
04/15/22	SJC	COMMUNICATIONS WITH ASSIGNEE'S TEAM REGARDING INSURANCE ISSUE AND REVIEW DOCUMENTATION REGARDING CLAIMS (.2); CONFERENCE CALLS AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING ASSET SALE ISSUES, INTELLECTUAL PROPERTY, NDAS, NOTICE OF PENDENCY OF ASSIGNMENTS FOR FILING IN NEW LITIGATION, AFFIDAVIT OF SERVICE, AND OTHER CASE MATTERS (.7)	0.90
04/18/22	PSS	INTEROFFICE CONFERENC WITH S. CAPUANO RE STATUS AND OPEN ISSUES (.2) WEEKLY CALL WITH M HEISE AND CO-COUNSEL RE STATUS AND OPEN ISSEUES (.5)	0.70
04/18/22	IMH	REVIEW FILINGS IN SUPPLEMENTAL PROCEEDINGS AND CLAIMS FILED BY SAME PARTIES AND PREPARE MEMO ENCOURAGING MOVANTS TO DISMISS COMPLAINTS IN FAVOR OF CLAIM OBJECTION PROCESS (.8); EMAILS WITH ASSIGNEE'S TEAM REGARDING INTERESTED BIDDERS AND SALE PROCESS (.2); PREPARE FOR (.2) AND PARTICIPATE IN WEEKLY STANDING TEAM CALL (.9)	2.10
04/18/22	CC	FINALIZE AND E-FILE NOTICE OF PENDENCY OF ASSIGNMENT FOR THE BENEFIT OF CREDITORS PROCEEDING IN 2 FILED CASES IN MIAMI-DADE COUNTY CIRCUIT COURT.	0.40
04/18/22	CC	ATTEND TEAM STATUS CALL.	1.00
04/18/22	GL	ATTEND STANDING CALL TO DISCUSS IP ISSUES.	0.50

F E E S

Date	Attorney	Description	Hours
04/18/22	SJC	COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING TRANSFER OF SUPPLEMENTAL PROCEEDING TO JUDGE FINE (.4); TELEPHONE CONFERENCES AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING NDAS, INITIAL CASE MANAGEMENT CONFERENCE, ASSET SALE ISSUES, CLAIMS AND ASSET RECOVERY ISSUES, FOREIGN RELATED PROCEEDINGS, AND OTHER CASE MATTERS (1.8); COMMUNICATIONS WITH COUNSEL AND REPRESENTATIVES OF VARIOUS INTERESTED PURCHASERS OF ASSETS OF ESTATE REGARDING NDA AND RELATED ISSUES, AND REVIEW PROPOSED CHANGES TO TEMPLATE NDA (.6); FINALIZE AND FILE NOTICES OF PENDENCY OF ABC CASE IN POST PETITION LITIGATION (.2).	3.00
04/19/22	PSS	MEMO FROM/TO S. CAPIUANO RE COMMUNICATION WITH COUNSEL TO FORESTER'S (.1) INTEROFFICE CONFERENCE WITH I HOMER RE HEARING ON MOTION TO STRIKE (.1)	0.20
04/19/22	IMH	STRATEGIZE REGARDING FILING OF MOTION TO ABATE FORESTERS' COMPLAINT (.3); REVISE MOTION TO ABATE (.2); PREPARE AND ANALYZE SCENARIOS FOR CLIENT AND COURT FOR PROCEEDING AGAINST FORESTERS' MOTION AND COMPLAINT IN PREPARATION FOR ORAL PRESENTATION TO COURT (1.3)	1.80
04/19/22	CC	PREPARE MOTION TO ABATE PROCEEDING RE FORESTERS COMPLAINT.	1.50
04/19/22	SJC	MEETINGS, TELEPHONE CONFERENCES AND EMAIL COMMUNICATIONS REGARDING SALE OF ESTATE ASSETS, FORESTERS MATTERS, AND OTHER CASE MATTERS (.5); REVIEW FORESTERS COMPLAINT AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING RESPONSE TO SAME AND EXTENSION OF DEADLINE TO RESPOND, AND REVIEW MOTION AND DRAFT ORDER TRANSFERRING CASE AND COMMUNICATIONS REGARDING SAME WITH COUNSEL FOR FORESTERS, TEAM AND CHAMBERS (1.2); PREPARE FOR HEARING ON MOTION TO STRIKE (1.2); COMMUNICATIONS WITH COUNSEL AND REPRESENTATIVES OF VARIOUS INTERESTED PURCHASERS OF ASSETS OF ESTATE, AND ASSIGNEE'S TEAM, REGARDING NDA AND RELATED ISSUES, AND REVIEW PROPOSED CHANGES TO TEMPLATE NDA (.7).	3.60
04/20/22	PSS	INTEROFFICE CONFERENCE WITH I HOMER RE FORESTOR'S COMPLAINT AND FOLLOW UP	0.30

F E E S

Date	Attorney	Description	Hours	
		INTEROFFICE CONFERENCE WITH S. CAPUANO AND I HOMER RE ARGUMENT ON MOTION TO STRIKE (.3)		
04/20/22	IMH	REVIEW DOCUMENTS SENT BY ASSIGNEE RELATED TO FISERV AND AMEX AND STRATEGIZE WITH TEAM REGARDING TIMETABLE FOR POTENTIALLY RESOLVING SAME (.4); REVISE FORESTER STIPULATION RELATED TO COMPLAINT (.2); REVIEW CBL RULES AND ANALYSIS IN SUPPORT OF REVISIONS TO MOTION TO ABATE (.8); TEAM STRATEGY CALL IN PREPARATION FOR 4/22 HEARING INCLUDING RESEARCH AND ANALYSIS FOR PRELIMINARY RESPONSE TO FORESTERS COMPLAINT (.8)	2.20	
04/20/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF FILING AFFIDAVIT OF SERVICE OF MOTION TO EXTEND TIME TO CONDUCT BUSINESS AND NOTICE OF AUCTION SALE.	0.30	
04/20/22	CC	PREPARE STIPULATION TO ACCEPT SERVICE AND EXTENDING TIME TO FILE RESPONSE TO COMPLAINT.	0.40	
04/20/22	CC	WORK ON MOTION TO ABATE PROCEEDING.	1.40	
04/20/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH COUNSEL AND REPRESENTATIVES OF VARIOUS INTERESTED PURCHASERS OF ASSETS OF ESTATE, ASSIGNEE AND ASSIGNEE'S TEAM, REGARDING NDA AND OTHER SALE RELATED ISSUES (1.1); PREPARATION FOR HEARING ON MOTION TO STRIKE AND MOTION TO EMPLOY SPECIAL COUNSEL (1.2); DRAFT AND CIRCULATE STIPULATION TO ACCEPT SERVICE AND EXTEND DEADLINES AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.0); ANALYZE COMPLAINT FROM FORESTERS AND LEGAL RESEARCH AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (1.2); CONFERENCE CALL WITH BERMUDA COUNSEL REGARDING BERMUDA PROCEEDINGS (.3); COMMUNICATIONS WITH COUNSEL FOR CREDITOR A NEWMAN AND ASSIGNEE'S TEAM REGARDING INQUIRY REGARDING ASSETS (.1).	4.90	
04/21/22	PSS	RESEARCH FS 727 RE FORESTER'S AND IOC S. CAPUANO RE ARGUMENT APPROACH	0.50	
04/21/22	JD	FINALIZE E-FILE STIPULATION TO ACCEPT SERVICE AND EXTENDING TIME TO FILE RESPONSE TO COMPLAINT [.2 NO CHARGE]	0.00	N/C
04/21/22	IMH	REVIEW DISCOVERY PROPOUNDED BY FORESTERS AND DISCUSS STRATEGY WITH RESPECT TO SAME	0.40	

F E E S

Date	Attorney	Description	Hours	
04/21/22	SJC	COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING SUBMISSION OF STIPULATION AND OTHER ISSUES RELATING TO SUPPLEMENTAL PROCEEDING AND SUBMIT SAME (.4); REVIEW REQUEST FOR PRODUCTION FROM FORESTERS AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (.8); PREPARE FOR HEARINGS ON MOTION TO STRIKE AND MOTION TO EMPLOY SPECIAL COUNSEL AND CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (2.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH COUNSEL AND REPRESENTATIVES OF VARIOUS INTERESTED PURCHASERS OF ASSETS OF ESTATE AND ASSIGNEE REGARDING DATA SHARING AND NDA REVISIONS AND OTHER RELATED ISSUES (1.2); EMAIL COMMUNICATIONS WITH COUNSEL FOR PLAINTIFF IN CALIFORNIA ACTION AND ASSIGNEE'S TEAM REGARDING INSURANCE ISSUES (.2);	5.10	
04/22/22	PSS	INTEROFFICE CONFERENCE WITH S. CAPUANO RE FORESTER'S HEARING (.2)	0.20	
04/22/22	JD	UPLOAD ORDER APPROVING EMPLOYMENT OF BAST AMRON LLP AS SPECIAL COUNSEL TO ASSIGNEE, MARK C. HEALY, EFFECTIVE AS OF MARCH 24, 2022 AND AUTHORIZING ASSIGNEE TO EXECUTE ENGAGEMENT LETTER [.1 NO CHARGE]	0.00	N/C
04/22/22	IMH	EMAILS AND FOLLOW UP WITH ASSIGNEE REGARDING SALE PROCESS AND ADDITIONAL DOCUMENTS NEEDED FOR SAME	0.30	
04/22/22	SJC	PREPARE FOR AND ATTEND HEARINGS ON MOTION TO STRIKE MOTION FOR INJUNCTION AND MOTION TO EMPLOY SPECIAL COUNSEL, AND TELEPHONE CONFERENCES AND EMAIL COMMUNICATIONS WITH CLIENT AND TEAM IN CONNECTION WITH SAME (2.5); FINALIZE AND SUBMIT ORDER ON MOTION TO EMPLOY SPECIAL COUNSEL AND COMMUNICATIONS WITH B AMRON AND TEAM REGARDING SAME (.3); EMAIL COMMUNICATIONS WITH COUNSEL FOR PLAINTIFF IN CALIFORNIA ACTION AND ASSIGNEE'S TEAM REGARDING INSURANCE ISSUES AND REVIEW POLICY (.8); CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND REPRESENTATIVES FOR POTENTIAL PURCHASERS REGARDING SHARING OF DATA AND NDAS (.6).	4.20	
04/25/22	PSS	ATTEND WEEKLY STATUS AND STRATEGY CALL	0.80	
04/25/22	IMH	TEAM DISCUSSIONS REGARDING ASSET SALE PROCESS AND COMMUNICATION WITH INTERESTED	2.40	

F E E S

Date	Attorney	Description	Hours
		BUYERS (.6); REVISE TEAM TASK LIST (.2); FOLLOW UP WITH CLERK OF COURT REGARDING ORDERS ON OPEN MATTERS (.2); TEAM DISCUSSIONS REGARDING STRATEGY FOR RESPONDING TO FORESTERS DISCOVERY REQUESTS (.3); PREPARE FOR AND PARTICIPATE IN STANDING ALL HANDS ON CALL LED BY M HEALY(.8); TEAM DISCUSSIONS REGARDING LATEST DISCUSSIONS WITH AMEX AND FISERVE-TIMELINE FOR DEALING WITH SAME (.3)	
04/25/22	CC	UPDATE TASK LIST.	0.40
04/25/22	CC	ATTEND TEAM STATUS CALL.	0.80
04/25/22	CC	CONFER WITH VARIOUS CREDITORS RE STATUS OF CLAIMS.	0.30
04/25/22	CC	REVIEW TRANSCRIPT OF HEARING HELD ON APRIL 22, 2022.	0.20
04/25/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING DISCUSSIONS AND COLLECTION FROM CREDIT CARD COMPANIES, OTHER ASSET COLLECTIONS AND SALE ISSUES, FORESTERS LITIGATION AND RELATED MATTERS, LANDLORD ISSUES, AND OTHER CASE MATTERS (1.8); REVIEW MOTION FOR REASSIGNMENT OF FORESTERS LITIGATION AND PROPOSED ORDER (.2); COMMUNICATIONS WITH BERMUDA COUNSEL REGARDING STATUS AND APPLICATION (.3); REVIEW ORDER APPROVING RETENTION OF SPECIAL COUNSEL AND COMMUNICATIONS WITH B AMRON REGARDING SAME (.2).	2.50
04/26/22	IMH	REVISE FORESTERS ORDER AND STRATEGIZE REGARDING NEXT STEPS (.3); REVIEW DOCUMENTS POTENTIALLY RESPONSIVE TO FORESTERS' REQUEST FOR PRODUCTION (.5)	0.80
04/26/22	CC	PREPARE E-BINDER FOR INITIAL CASE MANAGEMENT CONFERENCE ON 4/29/2022.	1.00
04/26/22	CC	ATTEND TO CREDITOR CALLS AND UPDATE CONTACT TRACKING CHART.	0.20
04/26/22	SJC	PREPARE FOR AND ATTEND ZOOM CONFERENCE WITH BERMUDA COUNSEL REGARDING APPLICATION IN BERMUDA, AND CIRCULATE PROPOSED LANGUAGE FOR APPLICATION (1.3); COMMUNICATIONS WITH COUNSEL FOR PLAINTIFF IN CALIFORNIA LITIGATION AND TEAM REGARDING INSURANCE ISSUES (.3); COMMUNICATIONS WITH TEAM REGARDING FORESTERS DISCOVERY AND OTHER LITIGATION ISSUES (.5); PREPARE FOR CASE	3.70

F E E S

Date	Attorney	Description	Hours
		MANAGEMENT CONFERENCE AND COMMUNICATIONS WITH TEAM REGARDING SAME (.8); REVIEW AND REVISE PROPOSED ORDER ON MOTION TO STRIKE FORESTERS MOTION FOR INJUNCTION AND CIRCULATE SAME TO COUNSEL FOR FORESTERS AND REVIEW TRANSCRIPT OF HEARING, AND COMMUNICATIONS WITH TEAM REGARDING SAME (.7)	
04/27/22	IMH	REVIEW MATERIALS NEEDED FOR CASE MANAGEMENT CONFERENCE AND PREPARE STATUS REPORT FOR THE COURT (.5); STRATEGIZE REGARDING FOLLOW UP COMMUNICATIONS WITH AMEX ON CHARGEBACK ISSUE (.3); TEAM DISCUSSIONS REGARDING ██████████ ██████████ IN FORESTERS ADVERSARY (.3); EMAILS WITH A DONNER REGARDING STATUS OF HELLMAN INVENTORY (.1)	1.20
04/27/22	CC	PREPARE REQUEST FOR ADMISSIONS TO FORESTERS.	1.50
04/27/22	SJC	CONFERENCE CALLS WITH TEAM REGARDING LITIGATION STRATEGY AND RELATED MATTERS (.5); EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING CREDIT CARD CHARGEBACKS, CREDITOR INQUIRIES, AND OTHER CASE MATTERS (.5); REVIEW COMMUNICATION FROM D HASLEM REGARDING IT ISSUES RELATED TO DUTCH INSOLVENCY PROCEEDING (.1); COMMUNICATIONS WITH ASSIGNEE REGARDING CREDIT CARD CHARGEBACK AND DISPUTE ISSUES (.1).	1.20
04/28/22	PSS	MEMO FROM/TO M. NARDELLA AND MARK HEALY RE PBGC COMMUNICATION (.1) MEMO TO PBGC COUNSEL (.1)	0.20
04/28/22	CC	UPDATE TASK LIST.	0.30
04/28/22	CC	WORK ON REQUEST FOR ADMISSIONS DIRECTED TO FORESTERS.	0.80
04/28/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING INITIAL CASE MANAGEMENT CONFERENCES, PENSION BENEFIT GUARANTY CORPORATION, CREDIT CARD RESERVE ISSUES, AND OTHER CASE MATTERS (1.3); PREPARE FOR INITIAL CASE MANAGEMENT CONFERENCES (1.6); REVIEW PROPOSED REVISIONS TO ORDER ON MOTION TO STRIKE FROM FORESTERS AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING SAME (.2); REVIEW DRAFT REQUEST FOR ADMISSIONS TO FORESTERS (.3)	3.40

F E E S

Date	Attorney	Description	Hours
04/29/22	PSS	REVIEW MEMO FROM S. CAPUANO RE CASE MANAGEMENT CONFERENCE (.1)	0.10
04/29/22	IMH	REVIEW AFFIDAVIT TO BE FILED IN BERMUDA PROCEEDING (.2); EMAILS WITH BERMUDA COUNSEL REGARDING SAME (.2); TEAM EMAILS REGARDING PROCEDURES FOR UPCOMING CASE MANAGEMENT CONFERENCES (.2); ATTN TO POTENTIAL FILINGS IN SUPPLEMENTAL ADVERSARIES FILED AGAINST THE ASSIGNEE (.2); FOLLOW UP WITH ASSIGNEE REGARDING DOCUMENTS TO BE PRODUCED TO FORESTERS (.3)	1.10
04/29/22	CC	UPDATE TASK LIST.	0.40
04/29/22	SJC	PREPARE FOR AND ATTEND INITIAL CASE MANAGEMENT CONFERENCES IN EACH ABC CASE AND COMMUNICATIONS WITH TEAM REGARDING SAME AND RELATED MATTERS (2.5); COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING VARIOUS SUPPLEMENTAL PROCEEDINGS AND PRE-ASSIGNMENT LITIGATION CASES AND REVIEW DOCKETS AND FILINGS (1.0); REVIEW AND WORK ON RESPONSE TO FORESTERS REQUEST FOR PRODUCTION AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (.6); COMMUNICATIONS WITH COUNSEL IN BERMUDA REGARDING DRAFT APPLICATION (.1)	4.20
05/02/22	PSS	MEMO TO M. HEALY RE PBGC/PENSION PLAN ISSUES (.1)	0.10
05/02/22	IMH	TEAM EMAILS REGARDING TODAY'S STANDING CALL (.2); REVIEW COURT'S ORDER SETTING ADDITIONAL CASE MANAGEMENT CONFERENCES AND PREPARE MEMO FOR TEAM REGARDING SAME (.3); EMAILS WITH AMSTERDAM TRUSTEE REGARDING INFORMATION REQUESTED FROM ASSIGNMENT CASE (.2); PARTICIPATE IN STANDING WEEKLY CALL WITH ASSIGNEE AND NARDELLA TEAM (.4); FOLLOW UP WITH M HEALY REGARDING PENSION ISSUES (.2)	1.20
05/02/22	CC	ATTEND WEEKLY TEAM STATUS CALL.	0.80
05/02/22	CC	UPDATE TASK LIST FOR WEEKLY TEAM STATUS CALL.	0.30
05/03/22	IMH	REVISE DISCOVERY TO FORESTERS (.3); FOLLOW UP WITH COURT REGARDING OPEN EMPLOYMENT APPLICATIONS (.2); ATTN TO EMAIL FROM C GLENN REGARDING INSURANCE INQUIRY AND COMMUNICATE WITH ASSIGNEE REGARDING SAME (.2); EMAILS AND ANALYSIS REGARDING ██████████ INQUIRIES (.5)	1.20

F E E S

Date	Attorney	Description	Hours
05/03/22	CC	UPDATE TASK LIST.	0.50
05/03/22	CC	PREPARE ANSWER AND AFFIRMATIVE DEFENSES TO FORESTERS COMPLAINT.	2.00
05/03/22	SJC	COMMUNICATIONS WITH TEAM REGARDING ASSET SALE ISSUES, CREDITOR INQUIRIES, FORESTERS LITIGATION, AND INSURANCE ISSUES, AND REVIEW ORDERS ON CASE MANAGEMENT SCHEDULE AND MOTION TO STRIKE	0.70
05/04/22	IMH	FOLLOW UP WITH ASSIGNEE REGARDING POTENTIAL OBJECTIONS TO AUCTION SALE (.2); TEAM STRATEGY CALL REGARDING DOCUMENTS TO BE PRODUCED TO FORESTERS (.2); WORK ON INTERROGATORIES TO FORESTERS (.2); REVIEW DOCUMENTS REGARDING ██████████ OFFER (.2); PREPARE NOTICE OF CONSUMMATION OF AUCTION (.2); FOLLOW UP WITH ASSIGNEE REGARDING LAWSUITS FILED BY CLAIMANTS AND PREPARE LETTER TO ENCOURAGE RESOLUTION AS PART OF CLAIMS OBJECTION PROCESS (.3)	1.30
05/04/22	CC	UPDATE TASK LIST.	0.30
05/04/22	CC	WORK ON ██████████	1.00
05/04/22	CC	PREPARE ASSIGNEE'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO FORESTERS.	0.80
05/04/22	CC	PREPARE ASSIGNEE'S OBJECTIONS AND RESPONSES TO FORESTER'S REQUEST FOR PRODUCTION OF DOCUMENTS.	0.80
05/04/22	CC	WORK ON REQUEST FOR ADMISSIONS.	0.40
05/04/22	CC	ATTEND CONFERENCE CALL WITH S. CAPUANO AND I. HOMER RE STATUS OF DELIVERABLES.	0.30
05/04/22	CC	WORK ON ANSWER AND AFFIRMATIVE DEFENSES TO FORESTERS' COMPLAINT.	1.20
05/04/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH COUNSEL FOR INTERESTED PURCHASER REGARDING SALE AND PRIVACY ISSUES (.6); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SALE ISSUES, LANDLORD AND LEASE ISSUES, BERMUDA ISSUES, INSURANCE ISSUES, PENSION ISSUES, FORESTERS LITIGATION, AND OTHER CASE MATTERS (1.4); COMMUNICATIONS WITH E PENZ REGARDING BERMUDA APPLICATION (.2); REVIEW APPLICATION TO EMPLOY BELGIUM COUNSEL AND COMMUNICATIONS REGARDING SAME AND HEARING	2.40

F E E S

Date	Attorney	Description	Hours
		(.2).	
05/05/22	PSS	STATUS MEMO FROM S. CAPUANO (.2) TELEPHONE CONFERENCE WITH CREDITOR RE CLAIM AND STATUS OF CASE AND MEMO TO C. CRUZ RE CLAIM FORM (.2)	0.40
05/05/22	IMH	REVISE TEAM'S WORKING TASK LIST (.2); REVIEW RECENT FILINGS AND PREPARE SUMMARY OF SAME FOR NEXT CASE MANAGEMENT CONFERENCE (.3)	0.50
05/05/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SALE EFFORTS AND PROCESS, NDA AND PRIVACY ISSUES, BERMUDA ISSUES, BAHAMAS ISSUES, BELGIUM ISSUES, NETHERLANDS ISSUES, PENSION ISSUES, AND OTHER CASE ISSUES (1.1); CONFERENCE CALLS WITH COUNSEL FOR INTERESTED PURCHASER REGARDING PRIVACY ISSUES (.5); WORK ON RESPONSE TO FORESTERS COMPLAINT AND COMMUNICATIONS WITH TEAM REGARDING SAME (.3); CONFERENCE CALL WITH E PENZ AND BEGIN REVIEW OF DOCUMENTS FROM BERMUDA COUNSEL (.3)	2.20
05/06/22	IMH	TEAM DISCUSSIONS REGARDING TIMING AND PROCEDURES FOR UPCOMING SALES	0.40
05/06/22	CC	FINALIZE AND E-FILE NOTICE OF HEARING ON MOTION TO APPROVE EMPLOYMENT OF ASTREA CVBA; SCHEDULE HEARING ON COURTMAP.	0.40
05/06/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING FORESTERS DISCOVERY, ORDER TO CONTINUE CONDUCTING BUSINESS, AND OTHER CASE ISSUES (.8); CONFERENCE CALL WITH S BREUER REGARDING CREDITOR ISSUES AND EMAIL COMMUNICATIONS REGARDING SAME (.3); CONFERENCE CALL WITH COUNSEL FOR INTERESTED PURCHASER REGARDING NDA ISSUES AND EMAIL COMMUNICATIONS WITH COUNSEL AND ASSIGNEE REGARDING SAME, AND REVIEW PROPOSED AGREEMENT (1.0); EMAIL COMMUNICATIONS WITH H RAY AND D SLIM REGARDING CREDITOR ISSUES (.1); WORK ON FORESTERS DISCOVERY AND COMMUNICATIONS WITH ASSIGNEE'S TEAM REGARDING SAME (.8); COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING ORDER ON REASSIGNMENT (.1); COMMUNICATIONS REGARDING HEARING ON RETENTION OF BELGIUM COUNSEL AND REVIEW NOTICE (.3).	3.40
05/09/22	IMH	REVIEW BILLING FOR ASSIGNEE'S PROFESSIONALS AND REVISE FOR FEE APPLICATION (.6); REVISE	1.50

F E E S

Date	Attorney	Description	Hours
		LANGUAGE IN NDA RELATED TO SALE PROCESS (.3)PARTICIPATE IN STANDING WEEKLY CALL WITH ASSIGNEE AND PROFESSIONALS AND ATTN TO FOLLOW UP ISSUES(.6)	
05/09/22	CC	ATTEND WEEKLY TEAM STATUS CALL.	0.80
05/09/22	CC	UPDATE TASK LIST FOR TEAM STATUS CALL.	0.40
05/09/22	CC	REVIEW N&N INVOICES; SUMMARIZE INVOICES OF N&N AND BSLLP.	0.40
05/09/22	CC	FINALIZE AND UPLOAD ORDER GRANTING ASSIGNEE'S MOTION TO CONTINUE CONDUCTING BUSINESS OF ASSIGNORS.	0.30
05/09/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND CO-COUNSEL REGARDING VARIOUS SALE ISSUES, PENSIONS ISSUES, DUTCH ISSUES, FORESTERS MATTER AND DISCOVERY, AUCTION SALE, AND OTHER CASE MATTERS (1.1); ZOOM CONFERENCE WITH H RAY AND D SLIM REGARDING CASE STATUS AND CREDITOR ISSUES (.5); REVIEW AND REVISE DRAFT AGREEMENT FROM PROSPECTIVE PURCHASER REGARDING DATA PROCESSING AND COMMUNICATIONS WITH ASSIGNEE REGARDING SAME, AND CONFERENCE CALL WITH COUNSEL FOR PURCHASER REGARDING SAME AND OTHER SALE ISSUES (1.4): REVIEW AND SUBMIT ORDER ON CONTINUATION OF BUSINESS AND COMMUNICATIONS REGARDING SAME (.2); COMMUNICATIONS WITH COUNSEL FOR INSURANCE COMPANIES REGARDING POLICIES AND REVIEW DOCUMENTS (.2); COMMUNICATIONS WITH CREDITORS REGARDING CLAIMS AND STATUS (.2).	3.60
05/10/22	IMH	TEAM EMAILS REGARDING SCOPE OF BERMUDA COUNSEL'S REPORT (.2); ATTN TO DOCUMENTS PROVIDED BY ASSIGNEE AS THEY RELATE TO FORESTER LITIGATION AND BEGIN REVIEW OF SAME (.5)	0.70
05/10/22	SJC	REVIEW AND REVISE AFFIDAVIT AND APPLICATION FOR RECOGNITION OF FOREIGN PROCEEDING IN BERMUDA COURT IN CONNECTION WITH GENTING PROCEEDING, AND COMMUNICATIONS WITH ASSIGNEE, BERMUDA COUNSEL AND TEAM IN CONNECTION WITH SAME (1.1); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING FORESTERS DISCOVERY, BERMUDA PROCEEDINGS, AND OTHER CASE MATTERS (.7); REVISE ANSWER AND AFFIRMATIVE DEFENSES TO FORESTERS' COMPLAINT AND LEGAL RESEARCH IN CONNECTION WITH SAME (.9);	4.20

F E E S

Date	Attorney	Description	Hours	
		CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH COUNSEL FOR INTERESTED PURCHASER OF ASSETS AND ASSIGNEE REGARDING SALE ISSUES (.8); CONFERENCE CALL WITH C JARVINEN REGARDING FOREIGN BANKRUPTCY TRUSTEE MATTERS AND COMMUNICATIONS WITH TEAM REGARDING SAME (.6); COMMUNICATIONS WITH CREDITORS REGARDING CLAIMS AND STATUS (.1).		
05/11/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH POTENTIAL PURCHASER OF ASSETS AND ASSIGNEE REGARDING DATA SHARING AND RELATED AGREEMENTS AND OTHER ISSUES, AND REVIEW AND REVISE AGREEMENT (2.0); COMMUNICATIONS WITH ASSIGNEE'S TEAM REGARDING TRAVEL INSURANCE MATTERS (.2); COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND CHAMBERS REGARDING REASSIGNMENT OF DEC ACTION (.1).	2.30	
05/12/22	CC	PREPARE [REDACTED]	1.50	
05/12/22	CC	BEGAN REVIEW OF DOCUMENTS RESPONSIVE TO FORESTERS' DOCUMENT REQUEST.	1.00	
05/12/22	CMG	CREATE ECLIPSE DATABASE [1.0 NO CHARGE]	0.00	N/C
05/12/22	CMG	DATA STAGING, PROCESSING AND LOADING OF FORESTER REQUEST FOR PRODUCTION INTO ECLIPSE REVIEW PLATFORM [.5 NO CHARGE]	0.00	N/C
05/12/22	SJC	COMMUNICATIONS WITH POTENTIAL PURCHASER OF ASSETS AND ASSIGNEE REGARDING DATA SHARING AND RELATED AGREEMENTS AND OTHER ISSUES (1.5); COMMUNICATIONS WITH TEAM AND ASSIGNEE'S TEAM REGARDING FORESTERS DISCOVERY (.8)	2.30	
05/13/22	IMH	ANALYSIS FOR BEST PROCEDURAL MECHANISM TO RESPOND TO FORESTER COMPLAINT (.4); REVIEW AND REVISE SAME (.3); REVISE RESPONSES TO OUTSTANDING DISCOVERY REQUESTS RELATED TO SAME (.3)	1.00	
05/13/22	CC	BEGIN REVIEW OF DOCUMENTS IN ECLIPSE FOR RESPONSIVE DOCUMENTS TO FORESTERS' REQUEST FOR PRODUCTION.	4.00	
05/13/22	SJC	DRAFT ANSWER AND AFFIRMATIVE DEFENSES TO FORESTERS COMPLAINT AND COMMUNICATIONS WITH TEAM AND CO-COUNSEL REGARDING SAME, AND LEGAL RESEARCH IN CONNECTION WITH SAME (2.3); CONFERENCE CALLS AND EMAIL	4.00	

F E E S

Date	Attorney	Description	Hours
		COMMUNICATION WITH TEAM REGARDING FORESTERS LITIGATION AND DISCOVERY AND BEGIN DOCUMENT REVIEW OF FORESTERS DISCOVERY (1.0); COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND CHAMBERS FOR J BAILEY REGARDING REASSIGNMENT OF LITIGATION (.2); EMAIL COMMUNICATIONS WITH ASSIGNEE AND COUNSEL FOR POTENTIAL PURCHASERS REGARDING ASSET PURCHASE ISSUES (.3); COMMUNICATIONS WITH ASSIGNEE REGARDING BERMUDA ISSUE (.1); COMMUNICATION WITH CREDITOR REGARDING STATUS (.1).	
05/16/22	IMH	PERFORM SECOND TIER REVIEW/ANALYSIS OF FLAGGED DOCUMENTS TO BE PRODUCED TO FORESTERS (.4); DRAFT DISCOVERY REQUESTS FOR FORESTERS (.4); TEAM DISCUSSIONS RELATED TO BIDS FOR ASSETS (.3); PARTICIPATE IN WEEKLY CALL WITH ASSIGNEE AND COUNSEL (.6)	1.70
05/16/22	CC	UPDATE TASK LIST FOR WEEKLY MEETING.	0.40
05/16/22	CC	ATTEND TEAM STATUS CALL.	0.80
05/16/22	CC	DOWNLOAD BANK STATEMENTS FROM ECLIPSE; RESEARCH STATEMENTS FOR PAYMENTS MADE BY FORESTERS INTO BANK OF TOKYO AND CITIBANK.	1.00
05/16/22	CC	FINALIZE AND E-FILE MARK HEALY'S ANSWER AND AFFIRMATIVE DEFENSES TO FORESTERS COMPLAINT.	0.20
05/16/22	CC	CONTINUE REVIEWING DOCUMENTS IN ECLIPSE FOR RESPONSIVE DOCUMENTS FOR THE PRODUCTION OF DOCUMENTS TO FORESTERS.	3.50
05/16/22	SJC	CONTINUE WORKING ON, FINALIZE AND FILE ANSWER AND AFFIRMATIVE DEFENSES AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.1); CONTINUE REVIEW OF DOCUMENTS FOR FORESTERS AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.2); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SALE MATTERS, BERMUDA MATTERS, PBGC MATTER, FORESTERS LITIGATION, FMC ISSUES, LEASE ISSUES, AND DISCOVERY, AND OTHER CASE MATTERS (1.2); REVISE BERMUDA AFFIDAVIT AND CIRCULATE SAME TO ASSIGNEE, AND CONFERENCE CALL WITH ASSIGNEE REGARDING SAME (.6); REVIEW ORDER ON EMPLOYMENT OF BELGIUM COUNSEL AND COMMUNICATIONS REGARDING SAME (.1).	4.20
05/17/22	IMH	ANALYSIS OF ISSUES RELATED TO PRIVILEGE IN PRODUCTION RESPONSIVE TO FORESTER'S REQUESTS	1.00

F E E S

Date	Attorney	Description	Hours
05/17/22	CC	REVIEW OF DOCUMENTS IN ECLIPSE FOR PRODUCTION TO FORESTERS IN RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS.	3.00
05/17/22	CC	CONTINUE PULLING AND SAVING BANK STATEMENTS RE FORESTERS.	1.50
05/17/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING SALE ISSUES, LEASE ISSUES, BERMUDA MATTERS, AND OTHER CASE MATTERS	0.90
05/18/22	IMH	REVISE DISCOVERY RESPONSES TO FORESTERS (.2); ANALYSIS REGARDING NEED TO FILE SALE NOTICE WITH REJECTION MOTION (.3)	0.50
05/18/22	SJC	REVISE AND CIRCULATE RESPONSES AND OBJECTIONS TO FORESTERS FIRST REQUEST FOR PRODUCTION, AND RESEARCH IN CONNECTION WITH SAME, AND COMMUNICATIONS WITH TEAM REGARDING SAME (2.0); COMMUNICATIONS WITH CO-COUNSEL REGARDING REJECTION OF LEASES (.3)	2.30
05/19/22	IMH	REVIEW MATERIALS REGARDING CURRENT GENTING PLANS AND STATUS OF OFFSHORE PROCEEDINGS (.4); EMAILS WITH ASSIGNEE AND TEAM REGARDING SAME (.2); REVISE DISCOVERY TO BE SERVED ON FORESTERS AND STRATEGIZE REGARDING NEXT STEPS (.3)	0.90
05/19/22	SJC	DRAFT FIRST REQUEST FOR ADMISSION AND FIRST SET OF INTERROGATORIES TO FORESTERS AND CONFERENCE CALLS AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (1.7); CONTINUE REVIEW OF DOCUMENTS (1.0); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING DUTCH BANKRUPTCY OF AFFILIATE, FORESTERS DISCOVERY AND OTHER CASE ISSUES (1.0).	3.70
05/20/22	IMH	ANALYSIS OF JUDGE'S RULES REGARDING IN PERSON SALE HEARING AND OPEN ISSUES RELATED TO SAME	0.40
05/20/22	SJC	BEGIN DRAFTING MOTION TO SELL ASSETS AND ORDER ON SAME (1.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SALE OF ESTATE ASSETS, SALE RELATED PREPARATION AND RELATED ISSUES, FORESTERS DISCOVERY AND OTHER CASE ISSUES (1.0); COMMUNICATIONS WITH FORESTERS COUNSEL REGARDING EXTENSION OF DEADLINES (.2); CONTINUE REVIEW OF FORESTERS DOCUMENTS AND COMMUNICATIONS WITH TEAM REGARDING SAME (.8); COMMUNICATIONS WITH CREDITOR REGARDING CLAIMS (.1).	3.60

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Date	Attorney	Description	Hours
05/21/22	SJC	COMMUNICATIONS WITH ASSIGNEE REGARDING FORESTERS DISCOVERY AND ASSET SALE ISSUES	0.20
05/22/22	PSS	MEMOS FROM M. HEALY AND S. CAPUANO RE OFFERS FOR ASSIGNEE ASSETS	0.20
05/22/22	SJC	REVIEW AND ANALYZE OFFER LETTER FOR ASSETS AND COMMUNICATIONS WITH ASSIGNEE REGARDING SAME	0.50
05/23/22	PSS	MEMOS TO M. HEALY RE SALE ISSUES AND MEMOS FROM/TO S. CAPUANO RE SAME (.2)	0.20
05/23/22	IMH	TEAM STRATEGY DISCUSSIONS REGARDING NEXT STEPS RELATED TO SALE OF ASSETS AND PROCEDURES RELATED TO SAME (.3); PARTICIPATE IN STANDING TEAM CALL INCLUDING DISCUSSION OF SALE PROCESS AND OPEN ISSUES RELATED TO NEXT CASE MANAGEMENT CONFERENCE (.9)	1.20
05/23/22	CC	UPDATE TASK LIST FOR WEEKLY CONFERENCE CALL.	0.40
05/23/22	CC	PREPARE NOTICE OF SERVICE OF DEFENDANT'S FIRST SET OF INTERROGATORIES TO PLAINTIFF.	0.30
05/23/22	CC	FINALIZE AND SERVE DEFENDANT'S FIRST REQUEST FOR ADMISSIONS AND FIRST SET OF INTERROGATORIES TO PLAINTIFF.	0.60
05/23/22	CC	FINALIZE AND SERVE DEFENDANT'S RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST REQUEST FOR PRODUCTION.	0.30
05/23/22	CC	ATTEND WEEKLY TEAM STATUS CALL.	1.00
05/23/22	SJC	FINALIZE AND SERVE RESPONSE AND OBJECTIONS TO FORESTERS' FIRST REQUEST FOR PRODUCTION, ASSIGNEE'S FIRST REQUEST FOR ADMISSION, AND ASSIGNEE'S FIRST SET OF INTERROGATORIES, RESEARCH IN CONNECTION WITH SAME, AND CONFERENCES AND COMMUNICATIONS WITH TEAM AND CO-COUNSEL REGARDING SAME AND PROPOSED REVISIONS TO SAME (1.8); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING ASSET SALE ISSUES, BERMUDA ISSUES, LEASE REJECTION MATTERS, AIRCRUISES ISSUES, AND OTHER CASE MATTERS (1.7); COMMUNICATIONS WITH LITIGANTS IN THE NETHERLANDS REGARDING CLAIM ISSUES (.2).	3.70
05/24/22	PSS	MEMOS TO/FROM S. CAPUANO RE STATUS RE SALE MATTERS	0.20
05/24/22	IMH	SECOND TIER REVIEW OF ADDITIONAL DOCUMENTS RESPONSIVE TO FORESTERS' REQUESTS (.5); CALL	1.10

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Date	Attorney	Description	Hours
		WITH CLERK REGARDING FORESTER CASE RE-ASSIGNMENT (.2); TEAM DISCUSSIONS REGARDING HERITAGE SALE PROCEDURE AND NEXT STEPS (.4);	
05/24/22	SJC	CONTINUE WORKING ON MOTION TO SELL ASSETS (1.0); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SALE OF ESTATE ASSETS, OFFER LETTER, RELATED COMPANY INSOLVENCY PROCEEDINGS, LANDLORD AND REJECTION ISSUES, AND OTHER CASE ISSUES (1.8); COMMUNICATIONS WITH PURCHASER OF ESTATE ASSETS REGARDING SALE ISSUES (.2); REVIEW ORDER TRANSFERRING FORESTERS LITIGATION AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING SAME (.3); REVIEW CREDIT CARD AGREEMENTS AND ANALYSES (.4).	3.70
05/25/22	IMH	ATTN TO ISSUES OF DOCUMENTATION OF HERITAGE SALE AND PREPARE OUTLINE FOR SAME	0.50
05/25/22	CC	PREPARE LETTERS TO [REDACTED] [REDACTED] E DELETION OF EVALUATION MATERIAL PURSUANT TO NDA.	0.40
05/25/22	GL	ANALYZE SALE OF CUSTOMER LIST/IP DATA RIGHTS ISSUES.	0.20
05/25/22	SJC	MEETINGS, CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING VARIOUS ASSET SALE AND RELATED ISSUES, PRIVACY RELATED ISSUES, FORESTERS LITIGATION, AND OTHER CASE ISSUES, AND LEGAL RESEARCH IN CONNECTION WITH SAME (1.7); DRAFT AND SERVE NOTICE TO DESTROY CONFIDENTIAL DATA TO INTERESTED PURCHASERS OF ASSETS AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, PURCHASERS AND THEIR COUNSEL REGARDING SAME (1.1).	2.80
05/26/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF PENDENCY OF ASSIGNMENT FOR THE BENEFIT OF CREDITORS - MIRKO LAPTALO.	0.60
05/26/22	CC	FINALIZE LETTERS TO [REDACTED] [REDACTED] E DELETION OF EVALUATION MATERIALS PURSUANT TO NDA.	0.40
05/26/22	CC	UPDATE TASK LIST.	0.40
05/26/22	SJC	COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SALE ISSUES, PRIVACY AND CONSUMER DATA ISSUES, PENSION ISSUES, D&O ISSUES, AND	1.90

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Date	Attorney	Description	Hours
		OTHER CASE ISSUES (.8); REVIEW AND REVISE MOTION TO REJECT LEASE AND COMMUNICATIONS WITH CO-COUNSEL REGARDING SAME, AND RESEARCH REGARDING SAME (.6); REVIEW NEWLY FILED LITIGATION AND FILE NOTICE OF PENDENCY OF ASSIGNMENT CASE AND COMMUNICATIONS WITH TEAM REGARDING SAME (.4); COMMUNICATIONS WITH COUNSEL FOR CREDITOR REGARDING CASE STATUS (.1)	
05/27/22	IMH	COMMUNICATE WITH CLERK'S OFFICE REGARDING NEXT CASE MANAGEMENT CONFERENCE AND STATUS OF PENDING SUPPLEMENTAL PROCEEDINGS (.2); REVISE INTERNAL STATUS MEMO AND COMMUNICATE WITH ASSIGNEE'S TEAM REGARDING OPEN ISSUES ON TASK LIST (.3)	0.50
05/27/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM AND CO-COUNSEL REGARDING ASSET SALE ISSUES AND OTHER CASE MATTERS (.7); COMMUNICATIONS WITH COUNSEL FOR PURCHASER OF ESTATE ASSETS (.1); RESEARCH REGARDING DISCOVERY ISSUES AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.0);	1.80
05/30/22	IMH	RESEARCH AND ANALYSIS REGARDING HANDLING PRIVACY ISSUES	0.40
05/30/22	SJC	COMMUNICATIONS WITH TEAM AND CO-COUNSEL REGARDING PRIVACY ISSUES (.2); COMMUNICATIONS WITH CREDITOR REGARDING CLAIM ISSUE (.1)	0.30
05/31/22	PSS	MEMO FROM COUNSEL TO PBGC AND MEMO TO S. CAPUANO RE STATUS (.1) MEMOS TO/FROM S. CAPUANO RE SALE ISSUES (.2)	0.30
05/31/22	IMH	TEAM EMAILS REGARDING LATEST REQUESTS BY BANKRUPTCY TRUSTEE IN AMSTERDAM AND REVIEW DOCUMENTS RELATED TO SAME (.3) EMAILS WITH L KAUFMAN REGARDING POTENTIAL CLAIMS AND PROCEDURES FOR ASSERTING SAME (.2); TEAM EMAILS REGARDING NEXT STEPS FOR RESPONDING TO PBGC INQUIRIES (.2)	0.70
05/31/22	SJC	PREPARE FOR AND ATTEND CALL WITH A LOSEY REGARDING PRIVACY AND SALE ISSUES (.6); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SALE ISSUES, PRIVACY MATTERS, PREPETITION LITIGATION, PENSION ISSUES, DUTCH BANKRUPTCY AND FOREIGN INSOLVENCY MATTERS, AND OTHER CASE ISSUES (1.3); COMMUNICATIONS WITH COUNSEL FOR PENSION BENEFIT GUARANTY CORPORATION	2.30

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Date	Attorney	Description	Hours	
		REGARDING CLAIMS ISSUES (.1); COMMUNICATIONS WITH L KAUFMAN REGARDING PREPETITION LITIGATION (.1); COMMUNICATIONS WITH COUNSEL FOR BUYER OF ESTATE ASSETS (.2).		
06/01/22	PSS	MEMOS FROM/TO S. CAPUANO AND COUNSEL FOR HERITAGE RE SALE ISSUES AND INTEROFFICE CONFERENCE WITH S. CAPUANO RE SALE ISSUES	0.40	
06/01/22	IMH	TEAM DISCUSSIONS AND RESEARCH REGARDING PROTOCOLS FOR POTENTIAL BUYERS OF ASSETS (.8); ANALYSIS REGARDING SCOPE OF APPROVAL PAPERS FOR POTENTIAL SALE (.3)	1.10	
06/01/22	DL	CONFER, MEMOS RE DEAL TERMS, ARRANGEMENTS, AGREEMENTS FOR POTENTIAL SALE TRANSACTION	0.20	
06/01/22	CC	PREPARE NOTICE OF HEARING ON MOTION TO REJECT CA LEASE; COORDINATE HEARING DATE WITH K. COOPER OF N&N.	0.30	
06/01/22	CC	PREPARE SUMMARY OF DOCUMENTS PROVIDED TO US BY MOECKER IN RESPONSE TO FORESTERS' REQUEST FOR PRODUCTION.	0.60	
06/01/22	CC	WORK ON REDACTIONS TO CRYSTAL CRUISES BANK STATEMENTS IN PREPARATION OF FORESTER PRODUCTION.	2.80	
06/01/22	SJC	PREPARE FOR AND ATTEND ZOOM CONFERENCE WITH COUNSEL FOR BUYER OF ESTATE ASSETS REGARDING SALE PROCESS AND RELATED MATTERS (.7); CONFERENCE CALLS, MEETINGS, AND EMAIL COMMUNICATIONS WITH ASSIGNEE, COCOUNSEL AND TEAM REGARDING SALE ISSUES, PRIVACY MATTERS, AND OTHER CASE MATTERS (1.7); REVIEW FORESTERS DOCUMENTS AND COMMUNICATIONS WITH TEAM REGARDING SAME (2.3); COMMUNICATIONS WITH COUNSEL FOR C BREIER RE CALIFORNIA LITIGATION ISSUES (.1)	4.80	
06/02/22	PSS	MEMOS FROM/TO S. CAPUANO RE SALE ISSUES (.2)	0.20	
06/02/22	JD	REDACT BANK STATEMENTS TO BE PRODUCED TO FORESTERS [1.0 NO CHARGE]	0.00	N/C
06/02/22	KLB	DISCUSSIONS WITH C. CRUZ REGARDING REDACTIONS TO BANK RECORDS AND ASSIST WITH REDACTING SAME IN ADVANCE OF PRODUCTION [.7 NO CHARGE]	0.00	N/C
06/02/22	CC	FINALIZE AND E-FILE NOTICE OF HEARING ON MOTION TO REJECT CA LEASE; UPLOAD DOCUMENTS IN COURTMAP.	0.40	

F E E S

Date	Attorney	Description	Hours	
06/02/22	CC	WORK ON REDACTIONS TO CRYSTAL CRUISES BANK STATEMENTS IN PREPARATION OF FORESTER PRODUCTION.	3.00	
06/02/22	SJC	PREPARE FOR AND ATTEND MULTIPLE CONFERENCE CALLS WITH COUNSEL FOR BUYER OF ASSETS REGARDING AGREEMENT AND OTHER SALE ISSUES (1.0); PREPARE FOR AND ATTEND CONFERENCE CALL WITH COUNSEL FOR C BRIER REGARDING INSURANCE ISSUES AND PREPETITION LITIGATION (.3); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING FORESTERS DISCOVERY, SALE ISSUES, HEARING ON LEASE REJECTION, AND OTHER CASE MATTERS (1.1); CONTINUE REVIEWING DOCUMENTS FOR PRODUCTION TO FORESTERS AND COMMUNICATIONS WITH TEAM IN CONNECTION WITH SAME (.7); DRAFT AGREED CONFIDENTIALITY ORDER AND SEND TO COUNSEL FOR FORESTERS, AND COMMUNICATIONS REGARDING SAME (.7).	3.80	
06/03/22	JD	REDACT BANK STATEMENTS TO BE PRODUCED TO FORESTERS [2.5 NO CHARGE]	0.00	N/C
06/03/22	IMH	STRATEGIZE REGARDING FORESTERS PRODUCTION, INCLUDING SCOPE OF CONFIDENTIALITY AGREEMENT (.3); PREPARE FOR NEXT CASE MANAGEMENT CONFERENCE (.3); DISCUSSION WITH ASSIGNEE REGARDING SALE OF CUSTOMER LISTS AND PRIVACY CONCERNS (.2)	0.80	
06/03/22	KLB	CONTINUE REDACTING CONFIDENTIAL INFORMATION FROM BANK STATEMENTS IN ADVANCE OF PRODUCTION [3.2 NO CHARGE]	0.00	N/C
06/03/22	CC	TAGGED RESPONSIVE DOCUMENTS "CONFIDENTIAL" FOR FORESTERS PRODUCTION.	1.00	
06/03/22	CC	CONFER WITH J. TORRES RE SPECIFICS OF PRODUCTION SET 1 TO FORESTERS.	0.20	
06/03/22	SJC	CONTINUE REVIEWING DOCUMENTS FOR PRODUCTION TO FORESTERS AND COMMUNICATIONS WITH TEAM IN CONNECTION WITH SAME (1.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING FORESTERS DISCOVERY, BERMUDA MATTER, SALE ISSUES, CASE MANAGEMENT CONFERENCE, AND OTHER CASE MATTERS (1.3); REVIEW PROPOSED REVISIONS FROM COUNSEL FOR FORESTERS TO AGREED CONFIDENTIALITY ORDER, MAKE FURTHER REVISIONS, AND CIRCULATE SAME (.5).	3.20	
06/03/22	JGT	CALL WITH THE LITIGATION TEAM AND WORKING	0.00	N/C

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Date	Attorney	Description	Hours	
		ON UPDATED REVIEW PANELS, TAGS AND SEARCHES TO ALLOW FOR CODING DOCUMENTS FOR PRODUCTION [.7 NO CHARGE].		
06/06/22	PSS	STATUS AND STRATEGY CALL WITH ASSIGNEE, M. NARDELLA AND BSLLP TEAM	0.90	
06/06/22	IMH	PREPARE REVISED TEAM AGENDA FOR TODAY'S HANDS ON CALL TO DISCUSS STATUS (.3); EMAILS REGARDING OPEN ISSUES RELATED TO HERITAGE SALE (.2); WORK ON DETAILS OF PROCEDURE FOR PRODUCTION OF DOCUMENTS TO FORESTERS AND IDENTIFY OPEN ISSUES RELATED TO SAME; STRATEGIZE REGARDING POTENTIAL SETTLEMENT OPTIONS (.5); PARTICIPATE IN TEAM CALL WITH ASSIGNEE (.9);	1.90	
06/06/22	CC	UPDATE TASK LIST.	0.30	
06/06/22	CC	WORK ON PRODUCTION SET 1 TO FORESTERS.	0.60	
06/06/22	CC	FINALIZE AND UPLOAD AGREED CONFIDENTIALITY ORDER.	0.30	
06/06/22	CMG	PREPARATION OF ELECTRONIC DOCUMENT PRODUCTION; CREATION OF SHAREFILE LINK FOR DATA TRANSMITTAL [1.3 NO CHARGE]	0.00	N/C
06/06/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND COCOUNSEL REGARDING SALE EFFORTS, LEASE REJECTION ISSUES, FORESTERS LITIGATION, PENSION ISSUES, AND OTHER CASE MATTERS (2.2); REVIEW REPLY BY FORESTERS TO ANSWER AND AFFIRMATIVE DEFENSES AND COMMUNICATIONS WITH TEAM REGARDING SAME (.3); COMMUNICATIONS WITH BUYER'S COUNSEL AND TEAM REGARDING DILIGENCE ISSUES (.8); COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING DOCUMENT PRODUCTION MATTERS (.3); FINALIZE AND FILE AGREED CONFIDENTIALITY ORDER AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING SAME, AND REVIEW ENTERED ORDER (.3); COMMUNICATIONS WITH TEAM REGARDING FORESTERS DOCUMENT PRODUCTION ISSUES (.6).	4.50	
06/07/22	IMH	ATTN TO ISSUES RELATED TO POTENTIAL HERITAGE SALE AND COMMUNICATE WITH ASSIGNEE REGARDING SAME	0.50	
06/07/22	CC	CORRESPOND WITH COUNSEL FOR FORESTERS RE PRODUCTION OF DOCUMENTS.	0.20	
06/07/22	SJC	COMMUNICATIONS WITH COUNSEL FOR BUYER AND	2.20	

F E E S

Date	Attorney	Description	Hours
		TEAM AND REGARDING ASSET AND LIEN ISSUES AND REVIEW DOCUMENTS IN CONNECTION WITH SAME (1.5); FINALIZE AND PRODUCE FIRST SET OF DOCUMENTS TO FORESTERS AND COMMUNICATIONS WITH TEAM REGARDING SAME (.4); CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH M LESSNE COUNSEL FOR CREDITOR REGARDING CLAIM ISSUES AND CASE STATUS AND REVIEW NOTICE AND CLAIM (.3).	
06/08/22	PSS	INTEROFFICE CONFERENCE WITH S. CAPUANO RE HERITAGE APA AND PRELIMINARY REVIEW HERITAGE APA (.3) INTEROFFICE CONFERENCE WITH S. CAPUANO AND D. LAMPERT RE SALE TRANSACTION (.3)	0.60
06/08/22	IMH	REVIEW INQUIRY FROM CREDITOR MASON AND COMMUNICATE WITH ASSIGNEE REGARDING SAME (.2); ATTN TO INQUIRIES RELATED TO DEADLINE FOR FILING PROOFS OF CLAIM (.3)	0.50
06/08/22	DL	RECEIVE DRAFT APA, PRELIMINARY REVIEW OF SAME (.6), PREPARE FOR AND PARTICIPATE IN CONFERENCE WITH REORG TEAM RE CONTEXT AND DEAL PARTICIPANTS (.7); BEGIN DETAILED REVIEW OF THE AGREEMENT AND BEGIN TO DRAFT ISSUES, COMMENTS (1.2), CONFER, MEMOS COLLABORATE FOR DISCUSSION POINTS LIST PRESENTATION TO CLIENT (.3); CONTINUE REVIEW, ANALYSIS OF APA, CROSS ANALYSIS AGAINST OTHER FORMS, ETC (.8); FINALIZE COMMENTS TO THE APA AND SEND FOR INTERNAL REVIEW (.4)	4.00
06/08/22	SJC	COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING FORESTERS LITIGATION, CASE MANAGEMENT CONFERENCE AND DEADLINES, DUTCH INSOLVENCY PROCEEDINGS, SALE ISSUES, LIEN ISSUES, CREDITOR INQUIRIES, AND OTHER CASE MATTERS (1.1); REVIEW AND BEGIN REVISING APA AND MEETINGS, CONFERENCES CALLS, AND EMAILS WITH ASSIGNEE AND TEAM REGARDING SAME, AND EMAIL COMMUNICATIONS WITH COUNSEL FOR BUYER REGARDING SAME (3.8); COMMUNICATIONS WITH COUNSEL FOR PGBC REGARDING PENSION ISSUES (.2);	5.10
06/09/22	PSS	MEMO FROM S. CAPUANO RE SALE STATUS AND REVIEW LETTER FROM LENDER'S COUNSEL (.2)	0.20
06/09/22	IMH	ANALYSIS RELATED TO CLAIMS FILED BY PBGC (.3); TEAM DISCUSSIONS REGARDING NEWLY SET CASE MANAGEMENT CONFERENCES, INCLUDING PREPARATION FOR SAME (.4); STRATEGIZE	1.20

F E E S

Date	Attorney	Description	Hours	
		REGARDING OPEN ISSUES RELATED TO APA AND CORRESPOND WITH M HEALY REGARDING SAME (.5)		
06/09/22	DL	CONFER, MEMOS WITH REORG TEAM RE NEXT STEPS WITH APA, COLLABORATE RE PREPARING DISCUSSION POINTS LIST (.4) CONTINUE REVIEW OF APA AND ANALYSIS RE REVISIONS REQUIRED, CLIENT INPUT NECESSARY, ETC (.9); RECEIVE FIRST DRAFT DISCUSSION POINTS LIST, REVIEW, REVISE, SHORTEN LIST AND CROSS ANALYSIS WITH APA AS REQUIRED TO DO SO; (1.3); FINALIZE AND SEND LIST FOR INTERNAL REVIEW (.4); DRAFT AND SEND COVER LETTER, COLLABORATE RE PRESENTATION TO CLIENT AND NEXT STEPS (.2),	3.20	
06/09/22	MXD	REVIEW AND REVISE APA ISSUES LIST; EMAILS REGARDING SAME [.2 NO CHARGE]	0.00	N/C
06/09/22	SJC	CONTINUE REVISING ASSET PURCHASE AGREEMENT AND TELEPHONE CONFERENCE AND EMAIL COMMUNICATIONS WITH TEAM, BUYER COUNSEL AND ASSIGNEE REGARDING SAME AND VARIOUS OTHER SALE RELATED ISSUES, AND CONTINUE WORKING ON MOTION TO SELL (4.2); COMMUNICATIONS WITH COUNSEL FOR PBGC, ASSIGNEE, AND TEAM REGARDING PENSION ISSUES (.3); COMMUNICATIONS WITH TEAM REGARDING FORESTERS LITIGATION AND REVIEW ORDERS AND NOTICES ENTERED BY JUDGE IN CASE, AND REVIEW FORESTERS PROOF OF CLAIM (.6); COMMUNICATIONS WITH TEAM REGARDING CREDITOR INQUIRIES AND PROOFS OF CLAIM (.3).	5.40	
06/10/22	PSS	MEMOS FROM/TO S. CAPUANO RE STATUS OF HERITAGE APA (.2)	0.20	
06/10/22	IMH	ATTN TO ISSUES REGARDING CONTINUATION OF ASSIGNEE CONDUCTING ASSIGNOR'S BUSINESS (.2); FOLLOW UP WITH ASSIGNEE REGARDING HERITAGE APA (.2); REVIEW TEAM EMAILS AND STRATEGIZE REGARDING OPEN ISSUES RELATED TO SAME (.7); STRATEGIZE REGARDING PRIVACY ISSUES RELATED TO SAME AND EMAILS WITH LOSEY REGARDING SAME (.3);	1.20	
06/10/22	DL	CONFER, MEMOS, COLLABORATE RE REVISIONS TO THE APA, DRAFTING AND OTHER ISSUES (.6), CONFER RE RESULTS OF CLIENT CONFERENCE, DEAL DECISIONS ON THE ISSUES LIST, FOLLOW UP RE SAME (.7), ANALYSIS, BEGIN TO DRAFT REVISIONS AND RIDERS TO THE APA (1.7); MEMOS AND FOLLOW UP RE DRAFTING, DEAL AND OTHER ISSUES (.4), CONTINUE DRAFTING REVISIONS AND RIDERS AND GENERATE	7.50	

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<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
		QUICK DRAFT FOR INTERNAL REVIEW (2.4); MEMOS AND FOLLOW UP RE COMMENTS AND NEXT STEPS, ISSUES RESIGN/CLOSE AT SAME TIME VIZ COURT APPROVAL, ETC (.6); CONTINUE REVIEW, ANALYSIS AND REVISIONS TO THE APA, FINALIZE NEXT DRAFT AND SEND FOR INTERNAL REVIEW (.8), FOLLOW UP MEMOS, ISSUES, ETC (.3)		
06/10/22	CC	UPDATE TASK LIST.	0.40	
06/10/22	MXD	REVIEW AND COMPARE ASSET PURCHASE AGREEMENT; EMAILS REGARDING SAME [.1 NO CHARGE]	0.00	N/C
06/10/22	SJC	CONTINUE REVISING ASSET PURCHASE AGREEMENT AND CONFERENCE CALLS, EMAIL COMMUNICATIONS WITH ASSIGNEE, BUYER COUNSEL, TEAM, AND COCOUNSEL REGARDING SAME AND RELATED ISSUES (6.0); COMMUNICATIONS REGARDING CREDITOR AND CLAIM ISSUES AND REVIEW VARIOUS FILED PROOFS OF CLAIM AND COMMUNICATIONS WITH TEAM REGARDING SAME (.7).	6.70	
06/11/22	DL	MEMOS, COLLABORATE RE COMMENTS AND CLIENT INPUT RE APA (.3) ; REVIEW MEMOS, PREPARE FOR AND PARTICIPATE IN CONFERENCE RE CLIENT COMMENTS TO APA (.6); REVIEW TURN OF THE APA AND BEGIN ANALYSIS, REVIEW, REVISIONS AND RIDERS TO APA, EFFECTUATING CLIENT COMMENTS, DEAL DECISIONS, AND OTHER REVISIONS, ETC (1.2); REVIEW NDA AND RESPOND TO MEMO RE SAME (.3); DRAFT AND SEND APA CLAUSES REQUIRING REORG TEAM INPUT (.4); CONTINUE REVIEW, REVISIONS TO THE APA FOR PRESENTATION TO THE CLIENT (.6); MEMOS, COLLABORATE RE TAX ISSUES, TRANSFER TAXES AND PURCHASE PRICE ALLOCATION (.3); CONTINUE APA REVISIONS, DRAFT REVISIONS TO COVER NOTE TO CLIENT RE STRUCTURE OF DEAL AND TAX POINTS (.4); FINALIZE NEXT TURN OF THE APA AND SEND TO REORG TEAM (.3); COLLABORATE RE CLIENT REVIEW, ISSUES AND RELATED REVISIONS, REVIEW NEW TURN OF APA AND COLLABORATE RE FINAL TWEAKS AND COVER NOTE TO BUYER COUNSEL (.4); COORDINATE, MEMOS RE CONFERENCE WITH BUYER COUNSEL (.2); PREPARE FOR AND PARTICIPATE IN CONFERENCE RE REVIEW OF APA (.1)	5.10	
06/11/22	SJC	CONTINUE WORKING ON APA AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, BUYER COUNSEL AND ASSIGNEE REGARDING SAME, AND CIRCULATE SAME TO CLIENT AND BUYER COUNSEL (5.5); COMMUNICATIONS WITH COCOUNSEL	5.60	

F E E S

Date	Attorney	Description	Hours
		REGARDING UPCOMING HEARINGS (.1)	
06/12/22	DL	MEMOS, COORDINATE RE ALL HANDS CONFERENCE CALL, APA DRAFTING AND OTHER POINTS, ETC	0.20
06/12/22	SJC	COMMUNICATIONS WITH BUYER COUNSEL AND TEAM REGARDING APA	0.20
06/13/22	PSS	INTEROFFICE CONFERENCE WITH S. CAPUANO RE STATUS OF HERITAGE SALE (.2) STATUS CALL WITH ASSIGNEE AND TEAM RE STATUS AND OPEN ISSUES (.5)	0.70
06/13/22	IMH	PREPARE FOR TEAM CALL WITH ASSIGNEE TO DISCUSS OPEN ISSUES (.3); PARTICIPATE IN SAME (.4); CALL WITH CLERK'S OFFICE REGARDING HEARING ON APA (.2); DISCUSSION WITH ASSIGNEE'S OFFICE REGARDING DOCUMENTS STILL TO BE PRODUCED TO FORESTERS (.2); DISCUSSIONS WITH M HEALY AND TEAM REGARDING DIFFERENT SCENARIOS FOR APPROVAL OF HERITAGE APA AND TIMING FOR SAME (.4)	1.50
06/13/22	DL	MEMOS, COLLABORATE, REVIEW DOCUMENTS AND PREPARE FOR CONFERENCE CALL WITH CLIENT AND BUYER'S COUNSEL (.6); REVIEW AND COLLABORATE RE NDA AND ATTY/CLIENT PRIVILEGE, OTHER ISSUES AND LANGUAGE (.3); PREPARE FOR AND PARTICIPATE IN ALL HANDS CONFERENCE CALL TO ADDRESS AND RESOLVE APA ISSUES (.7); MEMOS RE FREE CLEAR AND OTHER ABC ISSUES VS BANKRUPTCY CONCEPTS; COLLABORATE RE DEAL ISSUES AND NEXT STEPS, MEMOS RE SAME (.7); CONFER, MEMOS RE TAX ALLOCATION AND RELATED RISKS, NEED FOR TAX REVIEW (.3) ; MEMOS AND COLLABORATE FOR INPUT RE CONSUMER PRIVACY DATA (.4); MEMOS AND RESPONSES RE SALE HEARING SCHEDULE AND ALTERNATIVES, MEANS TO EXPEDITE (.2); REVIEW APA AND MEMOS, FOLLOW UP RE SCHEDULES TO THE AGREEMENT RE PURCHASED ASSETS, COLLABORATE RE DRAFTING THE SAME (.4); REVIEW MEMO AND ATTACHMENTS RE PRIVACY DATA, COVENANTS, COLLABORATE RE REVIEW OF SAME AND CLIENT INPUT (.3); CONFER, MEMOS, COLLABORATE RE APA SCHEDULES, RELATED ISSUES, AND REVIEW, REVISE, COMMENT UPON DISCLOSURE SCHEDULE MEMO (.4) ; MEMOS RE REQUESTING EXHIBITS FROM BUYER (.2);	4.50
06/13/22	CC	UPDATE TASK LIST AND CIRCULATE SAME FOR WEEKLY TEAM STATUS CALL.	0.20
06/13/22	CC	ATTEND WEEKLY TEAM STATUS CALL.	0.50

F E E S

Date	Attorney	Description	Hours
06/13/22	SJC	CONTINUE WORKING ON ASSET PURCHASE AGREEMENT AND SCHEDULES, PREPARE FOR AND ATTEND CONFERENCE CALL WITH TEAM, ASSIGNEE, AND COUNSEL FOR BUYER, AND VARIOUS OTHER MEETINGS, CONFERENCES, AND EMAIL COMMUNICATIONS WITH ASSIGNEE, COCOUNSEL AND TEAM REGARDING SAME AND OTHER SALE RELATED ISSUES (6.0); CONTINUE WORKING ON MOTION TO SELL ASSETS AND APPROVE APA AND ORDER ON SALE (1.3); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND COCOUNSEL REGARDING CASE MANAGEMENT CONFERENCE, FORESTERS DISCOVERY ISSUES, LEASE ISSUES, AND OTHER CASE ISSUES (.5)	7.80
06/14/22	PSS	MEMOS FROM/TO D. LAMPERT RE SALE ISSUES (.2)	0.20
06/14/22	IMH	EMAILS WITH M BAIRD AND TEAM REGARDING PBGC ISSUES (.3); FOLLOW UP WITH ASSIGNEE REGARDING CONTINUING PRODUCTION TO FORESTERS (.2)	0.50
06/14/22	DL	CONFER, MEMOS RE APA AND SCHEDULES (.3); PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL WITH REORG TEAM (.4); CONFER, MEMOS, COLLABORATE RE SHIP MOVEMENT, AGREEMENT IN PRINCIPLE, ETC, DRAFT REVISIONS TO MEMO AND COLLABORATE FOR FINAL COMMUNICATION RE SAME (.6); RECEIVE NEW DRAFT OF THE APA FROM BUYER COUNSEL, PRELIMINARY REVIEW, CONFER, COLLABORATE RE ISSUES AND POTENTIAL RESOLUTIONS, DRAFT, REVISE FINALIZE ISSUES LIST AND SEND FOR REVIEW (1.3) ; CONFER, MEMOS, ANALYSIS RE RESPONSE TO ISSUES LIST, APPROACHES TO RESOLVE SAME (.4); PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL WITH CLIENT TO ADDRESS AND RESOLVE ISSUES LIST (.7); FOLLOW UP RE DRAFTING AND OTHER ISSUES IN APA AND DISCLOSURE SCHEDULES, DIVISION OF LABOR AND ADVANCE APA AND DISCUSS DRAFTING AND OTHER ISSUES IN DISCLOSURE SCHEDULES (.4); MEMOS RE REORG TEAM INPUT INTO THE APA REVISIONS (.2), CONTINUE DRAFTING APA REVISIONS AND RIDERS, FINALIZE QUICK DRAFT OF APA TURN AND CIRCULATE FOR COMMENTS (.8); MEMOS AND FOLLOW UP RE COMMENTS TO APA (.2); RECEIVE AND BEGIN TO REVIEW DISCLOSURE SCHEDULES, REVISIONS AND RIDERS TO SAME (.7); CONSOLIDATE COMMENTS TO APA AND BEGIN ANALYSIS, REVISIONS, RIDERS TO TURN APA FOR CLIENT REVIEW (.6); MEMOS AND FOLLOW UP RE CONSUMER PRIVACY ISSUE REVIEW AND LANGUAGE TO RESOLVE (.2)	6.80

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
06/14/22	MXD	REVIEW AND REVISE THE ASSIGNMENT OF BILL AND SALE; EMAILS REGARDING SAME; REVIEW, REVISE AND COMPARE THE ASSET PURCHASE AGREEMENT; EMAILS REGARDING SAME [.2 NO CHARGE]	0.00	N/C
06/14/22	SJC	CONTINUE REVISING APA AND SCHEDULES THERETO AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND BUYER COUNSEL REGARDING SAME AND RELATED SALE MATTERS (7.0); PREPARE FOR AND ATTEND CONFERENCE CALL WITH COUNSEL FOR PENSION BENEFIT GUARANTY CORPORATION REGARDING PENSION ISSUES AND COMMUNICATIONS WITH ASSIGNEE REGARDING SAME (1.0)	8.00	
06/15/22	PSS	INTEROFFICE CONFERENCE WITH I. HOMER RE MOTION TO SHORTEN TIME AND SALE AGREEMENT	0.10	
06/15/22	IMH	ATTN TO ISSUES RELATED TO SECOND TIER REDACTION OF FORESTERS DOCUMENTS (.8); EMAILS AND DISCUSSIONS REGARDING SALE OF ASSETS AND OPEN ITEMS FOR APA (.9); REVISE MOTION AND ORDER REGARDING SAME (.3);	2.00	
06/15/22	DL	MEMOS, CONFER, COLLABORATE RE CUSTOMER PRIVACY PROVISIONS, ALTERNATIVES AND NEGOTIATION STANCE (.2); MEMOS AND FOLLOW UP RE FIRST DRAFT OF SCHEDULES, DETAILS OF ASSETS INCLUDED AND EXCLUDED (.3); PREPARE FOR, PARTICIPATE IN CONFERENCE CALL RE OPEN ISSUES AND RESOLUTIONS, NEXT STEPS (.4); REVIEW COMMENTS TO THE APA, ABC DOCUMENTS NEEDED FOR APA (.4); ; COORDINATE FOR CUMULATIVE MARK TO SEND FOR CLIENT REVIEW (.2); MEMOS AND FOLLOW UP RE LANGUAGE FOR CLOSING DATE, WAIVER OF FINALITY REQUIREMENT FOR SALE ORDER (.2); COLLABORATE RE SENDING FINAL REVISED AND CUMULATIVE MARKED APA TO THE CLIENT FOR COMMENT (.2); RECEIVE FIRST DRAFT OF THE APA SCHEDULES, LISTS OF INCLUDED AND EXCLUDED ASSETS; REVIEW OTHER FORMS ESP RE EXCLUDED ASSETS; COMPLETE INITIAL REVIEW AND SEND ISSUES, COMMENTS LIST/MEMO (.5); FOLLOW UP FOR DETAILED REVIEW AND DRAFTING REVISIONS AND COMMENTS (.3); CONFER, MEMOS RE CIRCULATING THE APA TO THE BUYER, COORDINATING FOR A CONFERENCE (.2); BEGIN REVIEW OF TWEAKS TO BILL OF SALE, MEMOS AND CONFER RE ISSUES (.2); FINALIZE, COMPLETE DRAFT OF SCHEDULES OTHER THAN EXCLUDED ASSETS (.3); MEMOS AND COLLABORATE PRIVACY CONCERNS ADDRESSING EMPLOYEE DATA (.2); REVIEW EXCLUDED ASSET FORMS AND ANALYSIS OF	6.70	

F E E S

Date	Attorney	Description	Hours	
		ADDITIONS TO OUR LIST RE CREDIT CARD RESERVE ACCOUNTS, ETC (.3); FINALIZE COMMENTS TO THE BILL OF SALE/ASSIGNMENT; SEND FOR INTERNAL REVIEW WITH COVER NOTE (.3); BEGIN REVIEW OF DRAFT ORDER APPROVE SALE, ANALYSIS AND REVISIONS, RIDERS, MEMOS RE ISSUES AND RESOLUTIONS; FINALIZE AND SEND FOR INTERNAL REVIEW (.2); REVIEW COMMENTS TO SCHEDULES AND COLLABORATE FOR FINAL VERSION TO RELEASE TO THE CLIENT (.3); MEMOS AND COLLABORATE, PREPARE FOR CONFERENCE WITH BUYER COUNSEL RE PENDING DOCUMENTS AND ITEMS (.3); MEMOS RE ISSUES IN MOTION TO APPROVE SALE (.1); PARTICIPATE IN CONFERENCE CALL WITH BUYER'S COUNSEL (.6); RECEIVE AND BEGIN TO REVIEW BUYER'S TURN OF THE APA AND BILL OF SALE, MEMOS RE ISSUES RE SAME, INCLUDING EMPLOYEE PRIVACY LANGUAGE (.3); MEMOS AND FOLLOW UP RE ADVANCING THE DISCLOSURE SCHEDULES TO THE BUYER (.2); MEMOS RE TWO SHIPS' PURCHASE CLOSING, CONSUMMATION (.1); REVIEW NEW TURN O THE APA, EFFECT TWEAKS, REVISIONS, CIRCULATE FOR COMMENTS (.4)		
06/15/22	MXD	REVIEW, REVISE AND COMPARE THE ASSET PURCHASE AGREEMENT; EMAILS AND ATTEND TELEPHONE CONFERENCE REGARDING SAME; REVIEW, REVISE AND COMPARE THE SCHEDULED TO APA; EMAILS AND TC REGARDING SAME [.5 NO CHARGE]	0.00	N/C
06/15/22	SJC	CONTINUE REVISING SALE MOTION AND ORDER AND CIRCULATE SAME TO TEAM AND ASSIGNEE FOR REVIEW, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, AND BUYER COUNSEL REGARDING SAME (2.0); CONTINUE WORKING ON APA, SCHEDULES, AND EXHIBITS, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, COCOUNSEL, AND BUYER'S COUNSEL REGARDING SAME AND VARIOUS RELATED SALE ISSUES (7.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH COUNSEL FOR FORESTERS, ASSIGNEE AND TEAM REGARDING FORESTERS EMAIL PRODUCTION, SEARCH TERMS, EXTENSION OF DEADLINES, AND OTHER RELATED MATTERS (.6)	10.50	
06/16/22	PSS	INTEROFFICE CONFERENCE WITH S. CAPUANO RE STATUS AND OPEN SALE ISSUES	0.20	
06/16/22	IMH	PREPARE FOR NEXT CASE MANAGEMENT CONFERENCE (.3); DISCUSSION REGARDING POTENTIAL 6/27 SALE HEARING AND PREPARE FOR	0.80	

F E E S

Date	Attorney	Description	Hours
		SAME (.5)	
06/16/22	DL	<p>CONFER, MEMOS, COLLABORATE FOR MEANINGFUL REDLINE OF APA (.2); MEMOS AND FOLLOW UP RE APA SCHEDULES, EXPEDITE CLIENT COMMENTS AND DISTRIBUTION TO BUYER COUNSEL (.2); REVIEW AND RESPOND TO MEMOS RE COMLUX AND RESPONSE THERETO (.1); CONFIRM CLIENT DECISION NOT TO USE IP TEAM(.2); REVIEW, ANALYSIS OF ALTERNATIVE FORMS, BEGIN TO REVIEW REVISE AND INSERT RIDERS INTO IP ASSIGNMENT (.6); COLLABORATE RE CLIENT CLEARANCE OF SCHEDULES AND SENDING TO BUYER COUNSEL WITH COVER NOTE (.2); FOLLOW UP REVIEW OF DOMAIN NAME LIST AND CONFER, MEMOS, TWEAKS RE DOMAINS RELATING TO OTHER SHIPS; CIRCULATE AS FOLLOW UP TO PRELIMINARY LIST (.4); REVIEW APA RE CONDITION RE PURCHASE OF THE TWO SHIPS AS NOW COMPLETED, CONFER, MEMOS RE SAME; DRAFT, REVISE AND SEND MEMO TO BUYER PROPOSING TO DELETE THE CONDITION AND REVISE THE MOTION TO APPROVE SALE TO MAKE THE ARGUMENT RE THE NEED FOR SPEED GIVEN THE CLOSING ON SALE OF THE TWO SHIPS; MEMOS AND FOLLOW UP RE SAME (.7); MEMOS RE DISCLOSURE SCHEDULE ISSUES RE EXCLUDED SHIPS AND ASSETS ON OTHER VESSELS, NEXT STEPS VIZ SAME (.2); COMPLETE INITIAL REVIEW, REVISIONS TO THE IP ASSIGNMENT AND SEND FOR COMMENT WITH RENEWED REQUEST FOR IP INPUT GIVEN THE COMPLEXITY OF THE DOCUMENT (.5); DRAFT, FINALIZE AND SEND REVISION TO THE MOTION TO APPROVE SALE ADDRESSING THE SALE OF THE TWO SHIPS COMPLETE NOW AND NEXT STEPS VIZ SALE HEARING SCHEDULE, TIMING (.3); REVIEW AND COORDINATE RE SIGNATURE PAGES FOR APA; FILING PACKAGES AND COORDINATE RE SAME INCLUDING WITH BUYER COUNSEL TO SIGN THE SAME PAGE (.3); REVIEW COMMENTS TO IP ASSIGNMENT, DRAFT REVISIONS TO INCLUDE COMMENTS, FINALIZE AND SEND NEXT DRAFT FOR REVIEW (.4); MEMOS AND COORDINATE RE SIGNATURE PAGES AND FILING PACKAGES TO GET TO THE COURT IN TIME FOR LATE JUNE HEARING DATE (.2); RECEIVE NEW TURN OF THE APA FROM BUYER COUNSEL, OBTAIN MEANINGFUL REDLINE, PRELIMINARY REVIEW AND MEMOS RE SAME, ETC (.4); PREPARE FOR ALL HANDS CONFERENCE CALL AND PARTICIPATE RE SAME, NEGOTIATE ISSUES WITH BUYER COUNSEL (.4); FOLLOW UP CONFERENCE WITH CLIENT RE RESOLUTIONS TO ISSUES AND NEXT STEPS (.2); DRAFT AND SEND FOLLOW UP MEMO TO PRIVACY</p>	6.90

F E E S

Date	Attorney	Description	Hours	
		COUNSEL RE EMPLOYEE INFORMATION AND RELATED CONCERNS (.1); REVIEW, REVISE, FINALIZE NEW TURN OF THE APA AND SEND WITH COVER NOTE RE INDEMNITY/OPT OUT ISSUES (.6); REVIEW, REVISE, FINALIZE NEW TURN OF THE SCHEDULES AND SEND WITH COVER NOTE (.2); REVIEW PRIVACY COUNSEL RESPONSE RE INDEMNITY BASKET, OTHER PROPOSALS; RESPOND TO SAME BY MEMOS (.2); REVIEW COUNSEL RESPONSE TO IP ASSIGNMENT AND ANALYSIS, DRAFT AND SEND PROPOSED TWEAKS TO SAME (.3)		
06/16/22	CC	REVIEW BSLLP INVOICES FOR REDACTIONS FOR FILING OF FIRST FEE APPLICATION.	0.80	
06/16/22	MXD	REVIEW, REVISE AND COMPARE THE ASSET PURCHASE AGREEMENT AND ASSIGNMENT OF BILL OF SALE; EMAILS AND TC REGARDING SAME [.5 NO CHARGE]	0.00	N/C
06/16/22	SJC	CONTINUE WORKING TO FINALIZE APA, SCHEDULES, AND EXHIBITS, AS WELL AS SALE MOTION AND SALE ORDER, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, COCOUNSEL, AND BUYER COUNSEL REGARDING SAME	8.20	
06/16/22	DAF	ATTENTION TO CREATING LITERA TRANSACT CHECKLIST FOR THE SALE OF CRYSTAL CRUISES; PREPARE SIGNATURE PAGE AND CIRCULATE FOR EXECUTION [2.1 NO CHARGE].	0.00	N/C
06/16/22	CKC	REVIEW PURCHASE AGREEMENT TO DETERMINE SIGNING DELIVERABLES. COORDINATE PREPARATION OF SIGNATURE PAGES [.9 NO CHARGE].	0.00	N/C
06/17/22	IMH	ANALYSIS OF OPEN ISSUES RELATED TO MOTION FOR APPROVAL OF APA AND REQUEST TO SHORTEN TIME TO CONSIDER SAME (.8); FOLLOW UP WITH ASSIGNEE'S TEAM REGARDING ADDITIONAL SEARCH TERMS AND ANALYSIS OF FORESTERS DOCUMENTS (.3)	1.10	
06/17/22	DL	MEMOS, CONFER RE PRIVACY COUNSEL AND OTHER COMMENTS TO THE APA AND IP ASSIGNMENT AND RELATED REVISIONS TO THE DOCUMENTS(.3); REVIEW AND REVISE IP ASSIGNMENT LANGUAGE; FINALIZE AND SEND TO BUYER'S COUNSEL WITH COVER NOTE (.3); MEMOS, CONFER RE SIGNATURE PAGE CONVENTION, ESCROW DELIVERY AND COORDINATE FOR SIMULTANEOUS RELEASE AND MOTION FILING (.2); COORDINATE FOR, PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL RE APA AND IP ASSIGNMENT, SOME DISCUSSION OF THE	2.00	

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Date	Attorney	Description	Hours
		SCHEDULES (.6), FOLLOW UP RE INDEMNITY AND OPT OUT ISSUES, MEMOS RE SAME AND FOLLOW UP CONFERENCE RE ALTERNATIVE RESOLUTIONS PENDING RESPONSE FROM BUYER (.4); REVIEW AND CONFER RE FILING PACKAGE, DATE ON FORM OF CLOSING DOCUMENTS (.2)	
06/17/22	SJC	CONTINUE WORKING ON APA, EXHIBITS, AND SCHEDULES, AS WELL AS SALE MOTION AND ORDER, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, COCOUNSEL, AND BUYER COUNSEL REGARDING SAME	6.20
06/18/22	DL	MEMOS, COORDINATE FOR CONFERENCE CALL RE SCHEDULES AND APA ISSUES, ETC (.2); MEMOS RE ISSUES AND OPPORTUNITIES ESP INDEMNITY LANGUAGE (.3)	0.50
06/18/22	SJC	COMMUNICATIONS WITH BUYER'S COUNSEL, TEAM AND ASSIGNEE REGARDING APA ISSUES	0.30
06/19/22	DL	PREPARE FOR CONFERENCE INCLUDING RE SPREADSHEETS ON FIXED ASSETS AND INVENTORY, PROPOSED LANGUAGE (.3), PARTICIPATE IN CONFERENCE CALL RE SCHEDULES AND APA, DISCUSS AND NEGOTIATE REVISIONS AND ISSUES (.8), COLLABORATE RE RESULTS OF NEGOTIATIONS, MEMOS AND CONFER RE SAME (.3); REVIEW BUYER COUNSEL MEMO RE APA AND DRAFT REVISIONS (.3) PLACE APA IN EXECUTION FORMAT, FINALIZE DRAFT AND PREPARE, REVISE, SEND WITH COVER NOTE RE CONCLUDING APA AND FILING MOTION FOR APPROVAL WITHOUT FINAL SCHEDULES (.6) ; REVIEW AND MEMO RE PRIVACY POLICY AS REFERENCED IN THE APA (.2); FOLLOW UP RE APA AND COVER NOTE, SEND WITH FINAL TWEAKS TO CLIENT(.3)	2.80
06/19/22	SJC	PREPARE FOR AND ATTEND CONFERENCE CALLS WITH BUYER, BUYER'S COUNSEL, ASSIGNEE, AND TEAM REGARDING APA, SCHEDULES, AND RELATED SALE ISSUES, AND EMAIL COMMUNICATIONS REGARDING SAME	2.20
06/20/22	PSS	INTEROFFICE CONFERENCE WITH S. CAPUANO RE STATUS OF SALE ISSUES AND DOCUMENTS (.2)	0.20
06/20/22	IMH	TEAM DISCUSSIONS REGARDING OPEN ISSUES RELATED TO APA AND STRATEGIZE REGARDING TIMING FOR HEARING ON SAME (.4); FOLLOW UP WITH ASSIGNEE REGARDING LATEST PBGC INQUIRY (.2)	0.60
06/20/22	DL	CONFER, MEMOS RE SCHEDULES AND OPEN APA	5.20

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Date	Attorney	Description	Hours
		ISSUES, FILING APA WITHOUT SCHEDULES, TIMING ISSUES AND ALTERNATIVES (.4); REVIEW MEMO RE APA TWEAKS FROM BUYER, REVISE AND CIRCULATE NEW DRAFT OF APA WITH BUYER REVISION (.3); COLLABORATE FOR ASSISTANCE IN NEGOTIATIONS, DISCUSSIONS, MEMOS AND COLLABORATE RE ISSUES AND NEXT STEPS (.4); MEMOS RE COMMENTS ON SCHEDULES AND APA RE TECHNOLOGY TRANSFER, INCLUDING NEED FOR IP ASSISTANCE, ETC (.6); MEMOS AND RESPONSES RE BUYER QUESTIONS RE LOCATION OF SERVERS, ETC (.2); BEGIN TO REVIEW, REVISE, ANALYZE TWEAKS TO THE SCHEDULES ESP RE TECHNOLOGY MATTERS (.4); COORDINATE FOR AND PREPARE FOR, PARTICIPATE IN ALL HANDS CONFERENCE CALL WITH BUYER COUNSEL AND CLIENT, NEGOTIATE MEMOS RE TIMING AND HEARING SCHEDULE AND DEADLINES TO FILE WITH MOTION PACKAGE AND NOTICE COMPLETION (.8); MEMOS RE REVISIONS TO APA AND SCHEDULES, DRAFTING ASSIGNMENTS (.3); COLLABORATE FOR CONFERENCE WITH BUYER COUNSEL, PREPARE FOR AND PARTICIPATE IN CONFERENCE WITH BUYER COUNSEL (.6); REVIEW NEW DRAFT OF SCHEDULES RE TECHNOLOGY TWEAKS (.2), MEMOS, ANALYSIS AND REVISIONS TO SAME INCLUDING REQUEST FOR IP REVIEW (.3); COMPLETE REVISIONS TO THE SCHEDULES AND DRAFT, REVISE FINALIZE COVER NOTE TO CLIENT RE SAME (.3); MEMOS AND FOLLOW UP RE RISK ELEMENTS (.2); MEMOS RE FILING DOCUMENTS AFTER MOTION (.2)	
06/20/22	SJC	CONTINUE REVISING APA AND SCHEDULES AND MULTIPLE CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH BUYER GROUP, BUYER COUNSEL, ASSIGNEE, AND TEAM REGARDING SAME AND VARIOUS SALE ISSUES (8.0); DRAFT ORDER CANCELLING INTERIM CASE MANAGEMENT CONFERENCE AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME, AND REVIEW ENTERED ORDER (.4); COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING DISCOVERY, SEARCH TERMS, AND RELATED ISSUES (.4); COMMUNICATIONS WITH COCOUNSEL AND TEAM REGARDING AIRCRUISES AND COMLUX ISSUES AND PBGC ISSUES (.4);	9.20
06/21/22	PSS	INTEROFFICE CONFERENCE WITH S. CAPUANO RE STATUS AND OPEN SALE ISSUES AND FORESTER'S DISCOVERY ISSUES AND MEMOS TO/FROM S. CAPUANO AND D. LAMPERT RE IP ISSUES IN SALE AGREEMENT	0.50
06/21/22	IMH	ATTN TO ISSUES RELATED TO HEARING ON APA AND	0.90

F E E S

Date	Attorney	Description	Hours
		PREPARATION FOR SAME INCLUDING TEAM CALLS AND ANALYSIS (.7); EMAILS REGARDING NEXT STEPS FOR MEET AND CONFER WITH FORESTERS (.2)	
06/21/22	DL	CONFER, MEMOS, REVIEW MATERIALS RE CLIENT RESPONSE TO REVISED APA SCHEDULES, ISSUES RE LANGUAGE AND RESOLUTIONS THEREOF (.5); COLLABORATE, DRAFT REVISIONS TO FINALIZE AGREED LANGUAGE FOR OK BY THE CLIENT (.4); MEMOS AND COLLABORATE RE IP INPUT TO TECHNOLOGY, COMPUTER LANGUAGE AND ISSUES (.3); CONFER, MEMOS RE SALE HEARING SCHEDULE AND PRACTICAL DEADLINE FOR RELEASE OF SIGNATURE PAGES AND MOTION FILING (.4); MEMOS AND COLLABORATE RE BUYER COUNSEL MEMOS RE REVIEW OF APA ISSUES, TWEAKS TO COME FROM THE BUYER; FOLLOW UP RE SAME (.3); RECEIVE NEW APA DRAFT AND NEW SECTION RE TRANSITION SERVICES, ANALYSIS, MEMOS AND CONFER RE SAME (.6); DRAFT REVISIONS TO NEW TECHNOLOGY PROVISIONS, FINALIZE AND CIRCULATE FOR COMMENTS (.7); CONTINUE REVIEW, RECEIVE COMMENTS, INTEGRATE INTO VERSION TO PRESENT TO CLIENT ; COLLABORATE TO FINALIZE SAME (.4); COMPILE AND SEND TO CLIENT WITH COVER NOTE (.2); MEMOS AND FOLLOW UP RE PRESENTATION TO CLIENT AND IP REVIEW, RELATED POINTS, CONFER RE SAME, ETC (.3); SEND DRAFT LANGUAGE TO BUYER COUNSEL SUBJECT TO CLIENT REVIEW WITH COVER NOTE (.2);	4.30
06/21/22	SJC	CONTINUE WORKING ON APA AND SCHEDULES AND TELEPHONE CONFERENCES AND EMAIL COMMUNICATIONS WITH TEAM, BUYER'S COUNSEL, AND ASSIGNEE REGARDING SAME AND OTHER SALE RELATED MATTERS (5.8); DRAFT LETTER TO POTENTIAL PURCHASER OF ASSETS REGARDING DESTRUCTION OF CONFIDENTIAL MATERIAL AND COMMUNICATIONS WITH TEAM REGARDING SAME (.4); COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CASE MANAGEMENT ISSUES (.1); COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING MEET AND CONFER (.2).	7.00
06/22/22	PSS	MEMOS FROM/TO S. CAPUANO AND D. LAMPERT RE STATUS AND SALE	0.20
06/22/22	PSS	MEMOS FROM/TO S. CAPUANO AND D. LAMPERT RE STATUS OF IP ISSUES AND PURCHASE AND SALE AGREEMENT (.4)	0.40
06/22/22	IMH	TEAM CALLS REGARDING STATUS OF APA AND FOLLOW UP REGARDING OPEN ISSUES	0.30

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
06/22/22	DL	REVIEW AND RESPOND TO MEMOS RE REVISIONS TO SCHEDULES, APA, MOTION RE 9 DAYS AND OTHER TERMS (.4), MEMOS AND COLLABORATE RE IP TEAM REVIEW AND MEMOS BRINGING IP TEAM TO SPEED (.3); REVIEW AND ANALYSIS, MEMOS RE REVISED TERMS FROM BUYER INCLUDING CLIENT LIABILITY FOR GROSS NEGLIGENCE (.4), MEMOS RE SAME AND COLLABORATE RE RESPONSE (.2); MEMOS RE BUYER'S ACCEPTANCE OF LANGUAGE AND COORDINATE RE FILING PACKAGE, INCLUDING APA, SCHEDULES, EXHIBITS (.3), COORDINATE RE SAME AND FOLLOW UP MEMOS RE FILING AND HEARING DATE (.2)	1.80	
06/22/22	CC	FINALIZE AND E-FILE MOTION TO APPROVE SALE OF ASSETS; PREPARE NOTICE OF HEARING.	1.00	
06/22/22	CC	PREPARE LETTER TO [REDACTED] RE DELETION OF EVALUATION MATERIALS PURSUANT TO NDA.	0.30	
06/22/22	GL	REVIEW AND ANALYZE APA, IP ASSIGNMENT, AND SCHEDULES REGARDING IP AND SOFTWARE ISSUES. PREPARE REVISIONS AND RECOMMENDATIONS REGARDING SAME. CONFER WITH DEAL TEAM REGARDING SAME.	2.00	
06/22/22	SJC	MEETINGS, CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, ASSIGNEE'S TEAM, TEAM, BUYER'S COUNSEL, AND IP TEAM REGARDING APA, SCHEDULES, AND EXHIBITS THERETO, AND MOTION AND SALE ORDER, AND NOTICE OF HEARING, AND FINALIZE AND FILE AND SERVE SAME (4.8); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH VARIOUS CREDITORS' COUNSEL REGARDING PROPOSED ASSET SALE (.5)	5.30	
06/22/22	DAF	UPLOAD REVISED ASSET PURCHASE AGREEMENT, EXHIBITS AND SCHEDULES TO LITERA TRANSACT, CREATE FULLY EXECUTED COLLATED ASSET PURCHASE AGREEMENT AND EMAIL SAME TO C. CHAN-PAK [2.1 NO CHARGE].	0.00	N/C
06/22/22	CKC	PREPARE FULLY EXECUTED APA INCLUDING SCHEDULES, NUMEROUS EXHIBITS AND SCHEDULES TO EXHIBITS. CORRESPONDENCE WITH WORKING GROUP REGARDING EDITS TO SCHEDULES TO IP ASSIGNMENT AGREEMENT. REVISE SCHEDULES TO IP ASSIGNMENT AGREEMENT ACCORDINGLY [2.3 NO CHARGE].	0.00	N/C
06/23/22	IMH	EMALS WITH E FERNANDEZ,, FORMER EMPLOYEE, REGARDING STATUS AND OPEN ISSUES (.2); EMAILS AND FOLLOW UP REGARDING ASSERTED SECURED	1.00	

F E E S

Date	Attorney	Description	Hours
		CLAIM BY HELLMAN (.4); EMAILS AND DISCUSSIONS REGARDING SCOPE OF SEARCH FOR ADDITIONAL DOCUMENTS REQUESTED BY FORESTERS (.4)	
06/23/22	CC	PREPARE, FINALIZE AND E-FILE CERTIFICATE OF SERVICE OF NOTICE OF HEARING ON SALE MOTION.	0.30
06/23/22	CC	PREPARE AND FINALIZE LETTER TO ██████████ RE DELETION OF EVALUATION MATERIAL PURSUANT TO NDA.	0.30
06/23/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF FILING AFFIDAVIT OF SERVICE OF MOTION TO APPROVE SALE OF ASSETS AND CORRESPONDING NOTICE OF HEARING.	0.40
06/23/22	SJC	REVIEW DISCOVERY RESPONSES FROM FORESTERS TO REQUESTS FOR ADMISSION AND INTERROGATORIES AND REVIEW AND ANALYZE NEW SEARCH TERM LIST FROM FORESTERS (.9); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SALE HEARING, NOTICE ISSUES, TRANSITION SERVICES AGREEMENT, CLAIMS ISSUES, AND OTHER SALE RELATED MATTERS (2.0); REVIEW RULING ON MARITIME ATTACHMENT ISSUE AND COMMUNICATIONS WITH ASSIGNEE REGARDING SAME (.3); COMMUNICATIONS WITH TEAM REGARDING CREDITOR INQUIRIES (.2).	3.40
06/24/22	IMH	REVIEW MATERIALS FOR 7/1 SALE HEARING	0.70
06/24/22	DL	MEMOS, CONFER RE CLOSING ARRANGEMENTS, SALE HEARING AND ORDER PROCESS AND TIMING, POTENTIAL TO CLOSE ON JULY 1 BEFORE THE HOLIDAY (.4); COORDINATE FOR CONFERENCE WITH BUYER'S COUNSEL RE SAME (.2); RECEIVE AND BEGIN REVIEW OF NETHERLANDS TRUSTEE LETTER (.3), CONFER, MEMOS, COLLABORATE RE RESPONSE AND DISCLOSURE TO THE BUYER COUNSEL (.2); FOLLOW UP AND COORDINATE RE SAME INCLUDING RE CLIENT RESPONSE (.3); PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL WITH BUYER COUNSEL, COLLABORATE RE CLOSING DOCUMENTS, SALE ORDER PROCESS AND REQUIREMENTS FOR ENTRY, AND DUTCH LETTER AND RESPONSE (.5); FOLLOW UP MEMOS, CONFER RE RESULTS AND NEXT STEPS, INCLUDING REVIEW OF STORAGE COST ALLOCATION, AGREEMENT RE PAST DUE AND CURRENT PORTION (.4)	2.30
06/24/22	SJC	REVIEW AND REVISE JOINT CASE MANAGEMENT REPORT IN FORESTERS LITIGATION AND PREPARE FOR AND ATTEND MEET AND CONFER WITH	5.90

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>
		COUNSEL FOR FORESTERS REGARDING DISCOVERY AND CASE MANAGEMENT REPORT, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (2.6); REVIEW CORRESPONDENCE FROM DUTCH TRUSTEE AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (.6); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND BUYER'S COUNSEL REGARDING TRANSITION SERVICES AGREEMENT AND OTHER EXHIBITS TO APA, CLOSING ISSUES, HEARING ON SALE, AND OTHER RELATED SALE MATTERS (2.7).	
06/27/22	IMH	TEAM EMAILS REGARDING UPDATES TO STATUS REPORT AND LATEST DISCUSSIONS WITH ASSIGNEE'S TEAM ON PBGC ISSUE AND FORESTERS DISPUTE (.4); TEAM DISCUSSIONS REGARDING MATERIALS NEEDED FOR SALE HEARING AND ANALYSIS OF SAME (.6)	1.00
06/27/22	CC	PREPARE E-BINDER FOR HEARING ON SALE MOTION SCHEDULED FOR JULY 1, 2022.	1.00
06/27/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND ASSIGNEE'S TEAM REGARDING FORESTERS DISCOVERY AND ESI ISSUES, SEARCH TERMS, CASE MANAGEMENT REPORT, AND RELATED MATTERS, AND REVIEW CERTAIN DOCUMENTS IN CONNECTION WITH SAME (1.8); COMMUNICATIONS WITH ASSIGNEE AND DUTCH TRUSTEE REGARDING SALE ISSUES (.6); REVIEW CREDITOR CLAIMS AND COMMUNICATIONS REGARDING SAME (.3); COMMUNICATIONS WITH POTENTIAL PURCHASER REGARDING DESTRUCTION OF DATA (.2); COMMUNICATIONS WITH TEAM REGARDING SALE ISSUES AND EXHIBITS (.3); COMMUNICATIONS WITH PENSION BENEFIT GUARANTY CORPORATION AND ASSIGNEE REGARDING PENSION ISSUES (.2).	3.40
06/28/22	PSS	INTEROFFICE CONFERENCE WITH S. CAPUANO RE STATUS AND CLAIMS OF DUTCH FIDUCIARY RE GOODS IN STORAGE AND POSITION OF BUYER (.2)	0.20
06/28/22	IMH	STRATEGIZE REGARDING POTENTIAL OBJECTIONS TO SALE MOTION (.3); PREPARE FOR HANDS ON CALL WITH ASSIGNEE TO DISCUSS CURRENT OPEN ITEMS (.4); PARTICIPATE IN SAME (.4)	1.10
06/28/22	DL	CONFER RE TSA AND DUTCH RECEIVER ISSUES, PAYMENTS AND BALANCE OF RISKS (.4); RECEIVE NEW DRAFT OF TRANSITION SERVICES AGREEMENT; FORWARD FOR IP TEAM REVIEW AND COMMENT (.2); REVIEW, ANALYSIS AND COMMENT ON AGREEMENT,	2.20

F E E S

Date	Attorney	Description	Hours	
		FORWARD DRAFT AND COVER NOTE WITH COMMENTS FOR INTERNAL REVIEW (1.6).		
06/28/22	CC	UPDATE TASK LIST.	0.40	
06/28/22	CC	ATTEND WEEKLY TEAM STATUS CALL.	0.50	
06/28/22	MXD	REVIEW AND REVISE THE TRANSITION SERVICES AGREEMENT; EMAILS REGARDING SAME [.2 NO CHARGE]	0.00	N/C
06/28/22	GL	INITIAL REVIEW OF TRANSITION SERVICES AGREEMENT. ATTENTION TO EMAIL COMMUNICATION WITH BUYER COUNSEL AND CLIENT REGARDING SAME.	0.80	
06/28/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND COCOUNSEL REGARDING LEASE ISSUES, CREDIT CARD ISSUES, AND OTHER CASE MATTERS (.5); REVISE JOINT CASE MANAGEMENT REPORT AND CIRCULATE TO FORESTERS COUNSEL, REVIEW DOCUMENTS AND COMMUNICATIONS WITH ASSIGNEE AND ASSIGNEE'S TEAM REGARDING FORESTERS DISCOVERY (1.3); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND BUYER'S COUNSEL REGARDING TRANSITION SERVICES AGREEMENT, SALE HEARING, DUTCH TRUSTEE CONCERNS, AND OTHER SALE AND CLOSING RELATED MATTERS AND REVIEW INITIAL DRAFT (1.2).	3.00	
06/29/22	PSS	MEMOS FROM/TO S. CAPUANO RE STATUS OF SALE ISSUES AND CLAIM OF DUTCH FIDUCIARY AND REVIEW LETTER AND OBJECTION OF DUTCH TRUSTEE (.5)	0.50	
06/29/22	IMH	EMAILS AND STRATEGY REGARDING SALE OF ASSETS ON ENDEAVOR	0.30	
06/29/22	DL	REVIEW AND RESPOND TO MEMOS (.2), PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL WITH CLIENT RE TSA AND EXCULPATION, LIABILITY LIMITING CONCEPTS AND OTHER ISSUES (.6); REVIEW LETTER FROM DUTCH RECEIVER AND ANALYSIS, CONFER, MEMOS RE RESPONSE AND POTENTIAL RESOLUTIONS (.4); PREPARE FOR, PARTICIPATE IN CONFERENCE WITH BUYER'S COUNSEL RE TSA AND DUTCH RECEIVER ISSUES AND POTENTIAL RESOLUTIONS (.6); CONFER, MEMOS RE NEW DEAL RE ENDEAVOR ASSETS, ARRANGEMENTS, CONFER, MEMOS RE COURT APPROVAL AND DOCUMENTATION REQUIREMENTS (.4); BEGIN REVIEW OF TSA AGREEMENT, COMMENTS, RESULTS OF COMMENTS AND CLIENT DECISIONS AND BEGIN DRAFTING	4.00	

F E E S

Date	Attorney	Description	Hours
		REVISIONS AND RIDERS TO THE TSA (.5); REVIEW FORMS AND DRAFT ADDITIONAL PROVISIONS; FINALIZE DRAFT AND SEND FOR INTERNAL REVIEW (.6), BEGIN REVIEW OF ENDEAVOR AGREEMENT, ANALYSIS RE COMMENTS AND ISSUES (.4), DRAFT NEW VERSION WITH COMMENTS, SEND FOR INTERNAL REVIEW (.3)	
06/29/22	CC	CONFER WITH DEANNE SANCHEZ OF JUDGE FINE'S CHAMBERS RE UPLOADING DOCUMENTS INTO COURTMAP; UPLOAD DOCUMENTS FOR JULY 1, 2022 HEARING INTO COURTMAP.	0.40
06/29/22	GL	WORK ON REVISIONS TO TRANSITION SERVICES AGREEMENT. CONFER WITH DEAL TEAM REGARDING SAME.	1.20
06/29/22	SJC	CONTINUE WORKING ON TRANSITION SERVICES AGREEMENT AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND BUYER COUNSEL REGARDING SAME, DUTCH TRUSTEE LETTER, AND OTHER SALE AND CLOSING RELATED ISSUES, AND BEGIN PREPARING FOR SALE HEARING (4.8); COMMUNICATIONS WITH DUTCH TRUSTEE AND REVIEW LETTERS (.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SALE OF ASSETS ON ENDEAVOR AND BEGIN REVIEWING PROPOSED DOCUMENTATION (1.2); REVIEW AND REVISE FORESTERS JOINT CASE MANAGEMENT REPORT REVISIONS AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING SAME, AND COMMUNICATIONS WITH ASSIGNEE'S TEAM REGARDING DISCOVERY AND ESI MATTERS (1.0)	7.50
06/30/22	PSS	MEMOS FROM/TO S. CAPUANO RE STATUS OF SALE ISSUES AND NEGOTIATIONS WITH DUTCH TRUSTEE (.2)	0.20
06/30/22	IMH	REVIEW MATERIALS RELATED TO 7/1 SALE HEARING AND PREPARE RESPONSE TO POTENTIAL OBJECTIONS (1.2); EMAILS REGARDING ISSUES RELATED TO ENDEAVOR APA (.2)	1.40
06/30/22	DL	MEMOS, COLLABORATE RE ENDEAVOR DEAL, ASSET PURCHASE, RELATED DOCUMENTS AND ISSUES (.4); CONFER, MEMOS RE COMPILING COMPREHENSIVE COMMENTS FOR DELIVERY TO CLIENT (.2); CONFER, MEMOS RE DUTCH ISSUES AND RESOLUTIONS WITHOUT DOCUMENTATION WITH BUYER (.3); REVIEW LIST OF PARTS, COLLABORATE RE SAME, ETC (.2); CONFER, MEMOS RE CLOSING UNDER APA AND RELATED ARRANGEMENTS, SIGNATURE PAGES,	3.70

F E E S

Date	Attorney	Description	Hours	
		ETC (.3); COLLABORATE FOR SALE HEARING, TSA REVISIONS, REVIEW NEW DRAFT COMMENTS FROM BUYER COUNSEL AND ESP RELATED SCHEDULES, OFFER CLEARANCE RE AGREEMENT AND COMMENTS RE SCHEDULES (.4); FOLLOW UP RE ENDEAVOR SALE AND RELATIONSHIP WITH ADMIRALTY MARSHALL SALE, ROLE OF BUYER AND RELATED CONCERNS (.3); FINALIZE DRAFT AGREEMENT RE ENDEAVOR AND SEND FOR COMMENTS (.4), REVIEW COMMENTS AND CONFER RE TALK WITH LENDER COUNSEL RE PARTIES, ETC (.2); COLLABORATE FOR AND PARTICIPATE IN CONFERENCE WITH LENDER COUNSEL RE IDENTITIES OF THE PARTIES, RELATIONSHIP WITH NEW BUYER, ETC (.3); FINALIZE LANGUAGE AND COLLABORATE TO GET DRAFT TO OTHER SIDE (.2); MEMOS AND COLLABORATE RE FINAL VERSIONS OF SIGNATURE PAGES (.2); MEMOS RE TRAILING ISSUES AND RESOLUTIONS RE SAME, THIRD PARTY BENEFICIARY LANGUAGE, TWEAKS AND SEND BACK FOR COMMENT (.3)		
06/30/22	CC	UPDATE E-BINDER FOR JULY 1, 2022 HEARING ON SALE MOTION.	0.30	
06/30/22	CC	UPLOAD OBJECTION TO SALE FILED BY NETHERLANDS BANKRUPTCY TRUSTEE INTO COURTMAP FOR JULY 1, 20220 SALE MOTION HEARING.	0.20	
06/30/22	MXD	REVIEW AND REVISE THE ASSET PURCHASE AGREEMENT FOR CRYSTAL ENDEAVOR; EMAILS REGARDING SAME; REVIEW, REVISE AND COMPARE THE TRANSITION SERVICES AGREEMENT; EMAILS REGARDING SAME [.2 NO CHARGE]	0.00	N/C
06/30/22	MXD	REVIEW AND REVISE THE CRYSTAL ENDEAVOR ASSET PURCHASE AGREEMENT; EMAILS REGARDING SAME [.2 NO CHARGE]	0.00	N/C
06/30/22	GL	ANALYZE SOFTWARE SCHEDULES TO TRANSITION SERVICES AGREEMENT	0.50	
06/30/22	SJC	CONTINUE PREPARING FOR HEARING ON SALE MOTION AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE AND BUYER COUNSEL REGARDING SAME, AND CONTINUE WORKING ON TRANSITION SERVICES AGREEMENT AND SCHEDULE (4.3); PREPARE FOR AND ATTEND CONFERENCE CALL WITH DUTCH TRUSTEE AND COMMUNICATIONS WITH ASSIGNEE, TEAM, AND BUYER COUNSEL REGARDING SAME (1.6); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND COUNSEL FOR	11.40	

F E E S

Date	Attorney	Description	Hours
		PROSPECTIVE PURCHASER FOR ASSETS ON ENDEAVOR REGARDING SALE, MAKE REVISIONS TO DRAFT ASSET PURCHASE AGREEMENT, DRAFT BILL OF SALE, AND RELATED TASKS RELATING TO POTENTIAL NEW SALE (5.1); REVIEW CLAIMS FILED IN CASE AND COMMUNICATIONS WITH COCOUNSEL REGARDING SAME (.2); COMMUNICATIONS WITH CREDITOR REGARDING CLAIMS ISSUES (.2)	
Total Hours:			900.50
Total Fees:			461,421.50

F E E S U M M A R Y

Attorney	Hours	Rate	Total
Kerry L. Burns	0.00	0.00	0.00
Samuel J. Capuano	438.30	525.00	230,107.50
Christa K. Chanpak	0.00	0.00	0.00
Carmen Cruz	180.30	265.00	47,779.50
Milaidy Davila	0.00	0.00	0.00
Janette Diaz	0.00	0.00	0.00
Deborah Fanich	0.00	0.00	0.00
Charles M. Gantz	0.00	0.00	0.00
Ilyse M. Homer	161.20	595.00	95,914.00
Daniel Lampert	73.90	730.00	53,947.00
Geoffrey Lottenberg	9.90	550.00	5,445.00
Paul S. Singerman	36.90	765.00	28,228.50
Jessie G. Torres	0.00	0.00	0.00
Total		900.50	\$461,421.50

E X P E N S E S

Date	Description	Amount
02/17/22	VENDOR: PLATINUM FILINGS LLC; INVOICE#: 2022-25546; DATE: 2/17/2022 - 30806.0001 UCC SEARCHES IN CALIFORNIA AND DELAWARE	493.50

EXPENSES

Date	Description	Amount
03/14/22	VENDOR: VERITEXT; INVOICE#: 5640833; DATE: 3/14/2022 - 30806.0001 WITNESS: JUDGE A. FINE, TRANSCRIPT HEARING, TRANSCRIPT SERVICES	664.50
03/24/22	VENDOR: OUELLETTE & MAULDIN COURT REPORTERS, INC; INVOICE#: 972281; DATE: 3/24/2022 - 30806.0001 HEARING - JUDGE ALAN FINE, ATTENDANCE OF REPORTER - 03/23/22	125.00
04/11/22	VENDOR: OUELLETTE & MAULDIN COURT REPORTERS, INC; INVOICE#: 972353; DATE: 4/11/2022 - 30806.0001 EXAMINATION OF: RICARDO CELORIO, ATTENDANCE OF REPORTER	887.90
04/25/22	VENDOR: OUELLETTE & MAULDIN COURT REPORTERS, INC; INVOICE#: 972402; DATE: 4/25/2022 - 30806.0001 HEARING - JUDGE ALAN FINE, ATTENDANCE OF REPORTER - 04/22/22	297.50
05/09/22	VENDOR: CITY NATIONAL BANK; INVOICE#: 7710-04/12/22; DATE: 5/9/2022 - FIRMS CORPORATE VISA 03/28/22 SQ SACHA'S AT BRICKELL	232.02
	CONFERENCE CALL CHARGES	734.32
	E-DISCOVERY DATA STORAGE FEE (\$12 PER GB)	264.00
	FEDERAL EXPRESS	98.82
	POSTAGE	1.96
	REPRODUCTION	523.80
	WESTLAW CHARGES	190.73
Total Expenses		\$4,514.05
CURRENT BALANCE DUE		\$465,935.55

 **BERGER SINGERMAN**

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FORT LAUDERDALE, FLORIDA 33301
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EIN# 45-3121429

MARK C. HEALY, IN HIS CAPACITY AS ASSIGNEE
FOR THE BENEFIT OF CREDITORS OF CRYSTAL
CRUISES, LLC
841 PRUDENTIAL DRIVE
JACKSONVILLE, FL 32207

August 5, 2022
Invoice: 255849

Client: 30806-0001

Re: ***REPRESENTATION OF ASSIGNEE FOR THE BENEFIT
OF CREDITORS OF CRYSTAL CRUISES LLC***

For professional services rendered thru: ***July 31, 2022***

Total Fees	85,572.00
Total Expenses	1,896.66
Total Balance Due	\$87,468.66

As always, it is our pleasure to work with you! Payment is due upon receipt.

Payments Options:

You may remit payment via check or visit www.bergersingerman.com/info/client-tools/ to pay with credit card.

If you wish to remit payment via wire transfer, please refer to the instructions below.

Thank you!

Wiring instructions for Berger Singerman:

Bank:	City National Bank of Florida
Bank Address:	25 W Flagler Street Miami, FL 33130
ABA No.:	066004367
Account Name:	Berger Singerman, LLP Merchant Account
Account No.:	██████████
Reference Number:	30806-0001



MARK C. HEALY, IN HIS CAPACITY AS
ASSIGNEE FOR THE BENEFIT OF CREDITORS OF
CRYSTAL CRUISES, LLC
841 PRUDENTIAL DRIVE
JACKSONVILLE, FL 32207

INVOICE DATE: August 5, 2022
INVOICE NO. 255849

REPRESENTATION OF ASSIGNEE FOR THE BENEFIT OF
CREDITORS OF CRYSTAL CRUISES LLC

MATTER ID: 30806-0001

PROFESSIONAL LEGAL SERVICES RENDERED THROUGH: July 31, 2022

F E E S

Date	Attorney	Description	Hours
02/15/22	IMH	PREPARE FOR MEETING WITH HEALY AND VON KAHLE INCLUDING REVIEW OF COMPANY DOCUMENTS AND REVISIONS TO CHECKLIST; TEAM EMAILS AND DISCUSSIONS REGARDING SAME	1.20
02/15/22	SJC	REVIEW PETITIONS AND SCHEDULES OF ASSIGNORS, RESEARCH REGARDING FILINGS AND ASSIGNOR BUSINESS, AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (1.7); DRAFT AND REVISE TASK AND CHECKLIST FOR CASE (1.6)	3.30
06/10/22	AJF	REVIEW APA FOR ISSUES AND PROVIDE COMMENTS	4.00
06/15/22	AJF	REVIEW AND REDLINE BILL OF SALE AGREEMENT	2.00
07/01/22	IMH	WORK ON SALE MOTION FOR ENDEAVOR APA (.3); EMAILS AND FOLLOW UP REGARDING HEARING ON SAME (.3); DEBRIEF REGARDING TODAY'S SALE HEARING AND NEXT STEPS FOR SCRUBBING CREDITOR CLAIMS (.4)	1.00
07/01/22	DL	REVIEW, RESPOND TO MEMOS, RE DUTCH RECEIVER ISSUES AND RESOLUTIONS, DOCUMENTATION AND COURT APPROVAL, RELATED CONCERNS AND ISSUES (.8); CONFER, MEMOS RE ENDEAVOR SALE AND RELATED PAPERS, SALE MOTION, ETC (.6); MEMOS AND COORDINATE RE SIGNATURE PAGES FOR HERITAGE SALE, CLOSING ARRANGEMENTS PENDING ENTRY OF SALE ORDER (.4); REVIEW AND FORWARD BUYER'S SIGNATURE PAGES (.3). MEMOS RE SELLER'S PAGES AND ADVANCING THE CLOSING (.3); REVIEW	6.00

F E E S

Date	Attorney	Description	Hours
		AND RESPOND TO MEMOS RE SALE ORDER AND ENTRY (.2), MEMOS FORWARDING SELLER'S SIGNATURE PAGES AND COORDINATING FOR CLOSING AND FUNDING, WIRE TRANSFER (.2); REVIEW AND RESPOND TO MEMOS RE ENDEAVOR ISSUES AND EXTENT OF CLAIMS WAIVER, ISSUES RE NEW OWNER OF THE ENDEAVOR AND SCOPE OF RELEASE (.7); ANALYSIS AND MEMOS, REVISIONS RE LIMIT TO PURCHASED ASSETS OR BROADER SCOPE DESPITE LACK OF IDENTITY (.4); MEMOS, CONFER RE SALE ORDER APPROVAL AND DUTCH RECEIVER RESOLUTION (.3); MEMOS AND CONFER RE FUNDING CONDITION, ETC; RECEIVE AND REVIEW MEMOS, SWIFT CONFIRMATION (.3); MEMOS AND RESPONSES RE SIGNATURES AND ARRANGEMENTS TO CONSUMMATE THE HERITAGE TRANSACTION (.3); MEMOS RE ISSUES AND RESOLUTIONS RE TSA AND OTHER ISSUES, ETC (.2); REVIEW MEMOS, CONFER, ANALYSIS OF ISSUES AND OPEN ITEMS RE ENDEAVOR TRANSACTION (.4); CONFER, MEMOS RE ISSUES RE SCOPE OF RELEASE, AGREEMENT RE NO TRANSFER, NEXT STEPS AND CLIENT OK BEFORE DRAFTING, ETC (.6)	
07/01/22	CC	PREPARE MOTION TO APPROVE SALE OF ASSETS OF CRYSTAL ENDEAVOR.	0.80
07/01/22	CC	WORK ON JOINT CASE MANAGEMENT REPORT (FORESTERS ADV.).	0.30
07/01/22	SJC	PREPARE FOR AND ATTEND HEARING ON SALE MOTION, REVISE AND SUBMIT SALE ORDER, AND CONFERENCE CALLS AND COMMUNICATIONS WITH TEAM, ASSIGNEE, AND BUYER COUNSEL REGARDING SAME AND VARIOUS CLOSING ISSUES, AND CONTINUE WORKING ON TRANSITION SERVICES AGREEMENT AND SCHEDULE TO SAME, AND VARIOUS CONFERENCE CALLS AND EMAILS REGARDING SAME, AND CLOSE SALE (3.5); EMAIL COMMUNICATIONS WITH DUTCH TRUSTEE AND COMMUNICATIONS WITH ASSIGNEE REGARDING RESOLVED OBJECTION TO SALE (.6); CONTINUE WORKING ON APA FOR ENDEAVOR SALE AND CONFERENCE CALLS AND COMMUNICATIONS WITH ASSIGNEE, TEAM, AND OPPOSING COUNSEL REGARDING SAME, AND BEGIN WORKING ON SALE MOTION AND SALE ORDER AND CIRCULATE INITIAL DRAFT TO TEAM (3.2); REVIEW JOINT CASE MANAGEMENT REPORT IN FORESTERS CASE AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING DISCOVERY ISSUES (.6); COMMUNICATIONS WITH MARITIME COUNSEL AND CONFERENCE CALL WITH ASSIGNEE REGARDING	8.30

F E E S

Date	Attorney	Description	Hours	
		LITIGATION OVER DEPOSITS (.4).		
07/01/22	DAF	RECEIPT AND REVIEW OF SELLER AND BUYER EXECUTED SIGNATURE PAGES; UPLOAD TO LITERA TRANSACT IN ANTICIPATION OF COLLATING FULLY EXECUTED DOCUMENT VERSIONS [.7 NO CHARGE].	0.00	N/C
07/02/22	DL	REVIEW NEW TURN OF THE ENDEAVOR AGREEMENT, DRAFT REVISIONS, RIDERS(.5); COLLABORATE RE SECTION 5.3 WAIVER, OTHER ISSUES AND RESOLUTIONS (.4); DRAFT, REVISE AND SEND LANGUAGE RE SUCCESSOR LIABILITY AS RELEASE (.2); COORDINATE RE BILL OF SALE (.1); COLLABORATE FOR FINAL DRAFT TO SEND TO BUYER/MORTGAGEE (.3); REVIEW MEMO SENT TO LONDON AND FRIENDLY AMEND RE CLIENT REVIEW AND COMMENT (.2); REVIEW NEW DRAFT CONCEPTS, DRAFT REVISIONS, SUGGESTIONS, COLLABORATE RE NEXT TURN OF THE ENDEAVOR APA (.3)	2.00	
07/02/22	SJC	CONTINUE REVISING APA WITH NEW BUYER RELATING TO ENDEAVOR SHIP, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, AND BUYER COUNSEL REGARDING SAME	2.80	
07/03/22	DL	REVIEW AND RESPOND TO MEMOS RE PENDING ISSUES AND NEXT STEPS (.3); MEMOS RE OPEN POINTS (.2); REVIEW AND ANALYSIS, COMMENT RE THE SALE MOTION AND ISSUE OF MARKETING EFFORTS (.6); FINALIZE SALE MOTION COMMENTS AND SEND FOR INTERNAL REVIEW (.2); RECEIVE NEW DRAFT APA FROM BUYER/MORTGAGEE COUNSEL, ANALYSIS, MEMOS AND COLLABORATE RE ISSUES AND COMMENTS (.4), FORWARD TO CLIENT WITH COVER NOTE RE ISSUES LISTED, MARKETING QUESTION POSED (.2); MEMOS AND FOLLOW UP RE RESPONSE AND NEXT STEPS (.3); REVIEW NEW TURN OF THE APA, ANALYSIS AND MEMOS TO APPROVE SAME (.2)	2.40	
07/03/22	SJC	CONTINUE REVISING APA WITH NEW BUYER RELATING TO ENDEAVOR SHIP, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, AND BUYER COUNSEL REGARDING SAME, AND CONTINUE WORKING ON SALE MOTION AND ORDER AND COMMUNICATIONS REGARDING SAME	2.60	
07/04/22	DL	REVIEW NEW TURN OF THE APA AND ESP COMMENTS FROM BUYER RE PROTECTION FROM ESTATE CLAIMS, ANALYSIS RE LIMITS ON ESTATE'S LIABILITIES, CONFINING STATEMENTS REGARDING ABSENCE OF OTHER CLAIMS, ETC, AND SEEKING SIMPLEST SOLUTION FOR END BUYER'S REQUIREMENTS (.7); CONFER, MEMOS WITH REORG TEAM RE NEW TURN	2.30	

F E E S

Date	Attorney	Description	Hours
		OF APA, FOLLOW UP MEMOS TO RESOLVE ISSUES (.3); DRAFT, REVISE AND SEND PROPOSED QUESTIONS FOR COUNSEL REGARDING SECTION 5.3 REQUEST, MEMOS RE NEXT STEPS WITH SAME (.4); REVIEW CLIENT MEMO RE AGREEMENT TO WAIVE CLAIMS RE OFF SHIP ITEMS, COLLABORATE RE SAME (.3); REVIEW, ANALYSIS RE BUYER'S NEW AND ADDITIONAL REQUEST; DRAFT AND SEND MEMOS RE LAST AND FINAL REQUEST (.2); ANALYSIS RE AFFIRMATIVE REPRESENTATIONS, MEMOS RE LIMIT RE NO NOTICE OF THIRD PARTY CLAIMS GIVEN OTHER GENTING ENTITY CLAIMS EVIDENCED THAT COULD BE ASSERTED (.4);	
07/04/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, AND BUYER COUNSEL REGARDING FURTHER REVISIONS TO APA	1.50
07/05/22	PSS	MEMOS FROM/TO S. CAPUANO RE STATUS OF DEAL RE PROPERTY RELATED TO EXPEDITION SHIP (.2)	0.20
07/05/22	IMH	REVISE MOTION FOR APPROVAL OF ENDEAVOR APA SALE TO BE HEARD ON 7/13 (.3); STRATEGIZE REGARDING OPEN ISSUES, TIMING FOR FILING AND NEXT STEPS (.4); PREPARE FOR CALL WITH NELSON MULLINS TEAM REGARDING ADDITIONAL SEARCHES AND PENDING DISCOVERY REQUESTS (.4)	1.10
07/05/22	DL	REVIEW AND RESPOND TO MEMOS RE ASSIGNEE EXECUTION AND SALE ORDER, MECHANICS AND PROCESS (.3); REVIEW, ANALYSIS AND RESPOND RE MEMOS REQUESTING NEW LANGUAGE FOR REPRESENTATION FROM ASSIGNEE RE ABSENCE OF CLAIMS, MEMOS AND CONFER RE EXISTENCE OF RELATED PARTY (GENTING) CLAIMS AND 20% PRICE (.4); REVIEW NEW TURN OF THE SALE MOTION AND ORDER (.4); DRAFT, REVISE, FINALIZE AND SEND PROPOSED LANGUAGE RE RECEIVED NO WRITTEN DEMAND TO ENFORCE AN ADVERSE THIRD PARTY CLAIM RE TITLE (.3); REVIEW AND RESPOND TO MEMOS RE DIFFERENT LANGUAGE; FOLLOW UP AND CONFER RE SAME (.3); CONFER, MEMOS SAME CLOSING BINDER ON THE FIRST DEAL, BUYER RESOLUTION, ETC (.2); MEMOS AND FOLLOW UP RE STATUS AND NEXT STEPS WITH THE ENDEAVOR BUYER, FINAL APPROVAL OF ALL LANGUAGE, DOCUMENTS AND MOTION (.4)	2.30
07/05/22	CC	REVIEW JUNE WIP.	0.40
07/05/22	SJC	CONTINUE REVISING APA WITH NEW BUYER RELATING TO ENDEAVOR SHIP, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM,	6.10

F E E S

Date	Attorney	Description	Hours	
		ASSIGNEE, GIBRALTAR COUNSEL AND BUYER COUNSEL REGARDING SAME, AND CONTINUE WORKING ON SALE MOTION AND ORDER AND COMMUNICATIONS REGARDING SAME (5.5); COMMUNICATIONS WITH BUYER COUNSEL IN HERITAGE DEAL REGARDING CLOSING (.5); COMMUNICATIONS WITH PROSPECTIVE PURCHASER REGARDING DESTRUCTION OF DATA (.1).		
07/05/22	DAF	PREPARE CLOSING BINDER FOR THE CRYSTAL CRUISES ASSET SALE; EMAIL SAME TO C. CHAN-PAK FOR REVIEW AND COMMENT [.9 NO CHARGE].	0.00	N/C
07/06/22	PSS	MEMO FROM/TO S. CAPUANO RE PBGC DOCUMENT REQUEST AND INTEROFFICE CONFERENCE WITH S. CAPUANO	0.20	
07/06/22	IMH	ANALYSIS OF PRIVILEGED DOCUMENTS POTENTIALLY RESPONSIVE TO FORESTERS' REQUEST FOR PRODUCTION (.3); TEAM DISCUSSIONS REGARDING 7/13 HEARING (.2); REVIEW INVOICES RELATED TO ASSIGNEE'S PROFESSIONALS IN BERMUDA AND BAHAMAS (.2); DISCUSSION WITH ASSIGNEE'S TEAM REGARDING TIMING OF FEE APPLICATIONS (.2); EMAILS REGARDING DOCUMENTS REQUESTED BY THE PBGC (.2)	1.10	
07/06/22	CC	FINALIZE AND E-FILE MOTION TO APPROVE SALE OF ASSETS (ENDEAVOR).	0.40	
07/06/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF HEARING RE MOTION TO APPROVE SALE OF ASSETS (ENDEAVOR).	0.40	
07/06/22	SJC	CONTINUE REVISING APA RELATING TO ENDEAVOR SHIP AS WELL AS SALE MOTION AND SALE ORDER, AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, GIBRALTAR COCOUNSEL, AND BUYER COUNSEL REGARDING SAME, AND FINALIZE AND FILE SAME AND NOTICE OF HEARING, AND BEGIN PREPARING FOR HEARING (3.8); REVIEW DOCUMENT AND INFORMATION REQUEST FROM PBGC AND CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH TEAM AND PBGC COUNSEL REGARDING SAME (.7); CONFERENCE CALL WITH D HASLEM REGARDING FORESTERS ESI AND DISCOVERY ISSUES AND COMMUNICATIONS WITH G FREEDMAN REGARDING SAME (1.1); COMMUNICATIONS WITH CREDITOR REGARDING PROOF OF CLAIM ISSUES (.1); COMMUNICATIONS WITH DUTCH TRUSTEE (.1).	5.80	
07/06/22	CKC	PREPARE INITIAL INDEX FOR CLOSING BINDER. PREPARATION OF VARIOUS CORRESPONDENCE REGARDING ITEMS NEEDED TO PREPARE CLOSING	0.00	N/C

F E E S

Date	Attorney	Description	Hours
		BINDER [1.6 NO CHARGE].	
07/07/22	IMH	EMAILS WITH D HASLAM REGARDING OPEN ISSUES RELATED TO FORESTERS PRODUCTIONS AND FOLLOW UP REGARDING REMAINING OPEN ISSUES RELATED TO G FREEDMAN'S LATEST REQUEST	0.50
07/07/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE'S TEAM REGARDING FORESTERS DISCOVERY PROJECT AND RELATED MATTERS (1.4); BEGIN PREPARATION FOR ENDEAVOR SALE HEARING AND COMMUNICATIONS WITH GIBRALTAR COUNSEL REGARDING RELATED MATTERS (1.0); COMMUNICATIONS WITH DUTCH TRUSTEE (.2); FINALIZE AFFIDAVIT OF SERVICE OF ENDEAVOR SALE MOTION AND HEARING NOTICE AND FILE SAME (.2).	2.80
07/08/22	IMH	PREPARE FOR NEXT WEEK'S CASE MANAGEMENT CONFERENCE IN FORESTERS	0.30
07/08/22	CC	PREPARE E-BINDER FOR 7/13/2022 SALE HEARING.	1.00
07/08/22	SJC	COMMUNICATIONS WITH DUTCH TRUSTEE REGARDING REQUEST FOR DATA AND OTHER ISSUES (.2); COMMUNICATIONS WITH TEAM AND COUNSEL FOR FORESTERS REGARDING DISCOVERY AND SEARCH TERMS AND ICMC (.8); COMMUNICATIONS WITH TEAM REGARDING CLOSING OF SYMPHONY AND SERENITY SALE AND RELATED ISSUES (.5)	1.50
07/10/22	SJC	COMMUNICATIONS WITH TEAM REGARDING ENDEAVOR SALE HEARING	0.20
07/11/22	PSS	INTEROFFICE CONFERENCE WITH S. CAPUANO RE STATUS AND OPEN ISSUES AND FORESTERS LITIGATION (.3) TEAM CALL RE STATUS (.5)	0.80
07/11/22	IMH	DISCUSSION WITH ASSIGNEE'S TEAM REGARDING PLAN FOR MEETING DEADLINE FOR FORESTERS PRODUCTION AND REVIEW DOCUMENTS RELATED TO SAME (.4); REVISE TEAM TASK LIST FOR TODAY'S HANDS ON CALL WITH NARDELLA TEAM AND ASSIGNEE (.2); PARTICIPATE IN SAME AND ATTN TO FOLLOW UP ISSUES (.7); FOLLOW UP WITH ASSIGNEE REGARDING PBGC DOCUMENT REQUESTS (.2); PREPARE UPDATE OF MATERIALS FOR TOMORROW'S ENDEAVOR ASSET SALE HEARING (.2)	1.70
07/11/22	DL	REVIEW MATERIALS, PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL WITH REORG TEAM TO GET TO SPEED ON THE DEAL AND OPEN ITEMS FOR CLOSING (.4), COLLABORATE RE SAME, SIGNATURE PAGES, ETC (.3)	0.70

F E E S

Date	Attorney	Description	Hours
07/11/22	CC	ATTEND WEEKLY TEAM STATUS CALL.	0.80
07/11/22	CC	UPDATE TASK LIST.	0.30
07/11/22	CC	REVIEW N&N INVOICES FOR MONTH OF JUNE.	0.30
07/11/22	CC	REVIEW BSLLP INVOICES FOR MONTH OF JUNE.	0.30
07/11/22	CC	ASSEMBLE INVOICES FOR FIRST INTERIM FEE APPLICATION OF PROFESSIONALS.	0.30
07/11/22	SJC	PREPARE FOR HEARING ON SALE OF ENDEAVOR ASSETS AND COMMUNICATIONS WITH TEAM REGARDING SAME AND RELATED MATTERS, AND COMMUNICATIONS WITH BUYER COUNSEL AND TEAM REGARDING PRECLOSING ISSUES AND FINALIZING EXHIBIT (2.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING ENDEAVOR SALE HEARING AND RELATED SALE MATTERS, FORESTERS LITIGATION AND DISCOVERY, PENSION ISSUES, ISSUES REGARDING DUTCH TRUSTEE, FEE APPLICATIONS, LANDLORD AND REJECTION MATTERS, CLAIMS ANALYSIS, CREDIT CARD RESERVES, AND OTHER CASE MATTERS (2.6); COMMUNICATIONS WITH COUNSEL FOR CREDITOR REGARDING LATE FILED CLAIMS AND NOTICE ISSUES (.2)	5.30
07/12/22	IMH	STRATEGIZE REGARDING KNOWN CLAIMS OBJECTIONS AND LITIGATION (.4); REVIEW INVOICES AND REDACTIONS FOR PROFESSIONAL FEE STATEMENTS (1.2); CONTINUE SECOND TIER REVIEW AND ANALYSIS OF DOCUMENTS FOR PRODUCTION IN FORESTERS LITIGATION (.5)	2.10
07/12/22	DL	CONFER, MEMOS, COLLABORATE RE SALE HEARING, CLOSING DOCUMENTS (.2); MEMOS RE BILL OF SALE RE EXECUTION COPY (.2); FOLLOW UP RE CLOSING ARRANGEMENTS (.2)	0.60
07/12/22	CC	PREPARE MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY BERGER SINGERMAN LLP.	2.00
07/12/22	SJC	FINALIZE ENDEAVOR BILL OF SALE AND COMMUNICATIONS WITH TEAM AND BUYER COUNSEL REGARDING SAME, PREPARE FOR SALE HEARING RELATING TO ENDEAVOR ASSETS, AND TELEPHONE CONFERENCE AND EMAIL COMMUNICATIONS REGARDING SAME WITH TEAM, ASSIGNEE, AND BUYER'S COUNSEL (4.5); EMAIL COMMUNICATIONS WITH COUNSEL FOR CREDITOR AND ASSIGNEE REGARDING NOTICE AND CLAIMS ISSUES (.1); COMMUNICATIONS WITH TEAM REGARDING THE PREPARATION OF FEE	5.10

F E E S

Date	Attorney	Description	Hours	
		APPLICATIONS FOR ASSIGNEE AND COUNSEL (.5)		
07/12/22	DAF	RECEIPT AND REVIEW OF EMAILS FROM S. CAPUANO AND D. LAMPERT, PREPARE COLLATED COPY OF EXECUTED ENDEAVOR BILL OF SALE; EMAIL SAME TO D. LAMPERT AND C. CHAN-PAK [.4 NO CHARGE].	0.00	N/C
07/13/22	PSS	MEMO FROM/TO S. CAPUANO RE SALE OF ENDEAVOR ASSETS (.1)	0.10	
07/13/22	IMH	MEETING WITH M HEALY AND S CAPUANO REGARDING VARIOUS OPEN ISSUES, PLANNING FOR NEXT CASE MANAGEMENT CONFERENCE AND INITIAL DISTRIBUTION TO CREDITORS (.8); WORK ON MOTION TO APPROVE FEES FOR ALL ESTATE PROFESSIONALS (.4)	1.20	
07/13/22	DL	CONFER, MEMOS RE SALE HEARING AND RESULTS (.3), COLLABORATE FOR CIRCULATING EXECUTION COPY OF BILL OF SALE (.2), DRAFT, REVISE ESCROW DELIVERY/CLOSING INSTRUCTIONS TO BUYER; FOLLOW UP RE SAME (.4)	0.90	
07/13/22	CC	WORK ON MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY BERGER SINGERMAN LLP.	1.20	
07/13/22	CC	WORK ON MOTION FOR APPROVAL OF FEES OF MARK HEALY, ASSIGNEE	1.00	
07/13/22	CC	WORK ON INVOICE OF BSLLP FOR PERIOD OF FEBRUARY 16, 2022 THROUGH JUNE 30, 2022 IN PREPARATION OF FIRST INTERIM FEE APPLICATION.	1.00	
07/13/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF ZOOM/VIRTUAL HEARING (MOTION CALENDAR) RE MOTION TO EMPLOY INCE (GIBRALTAR) LIMITED; UPLOAD DOCUMENTS INTO COURTMAP FOR HEARING ON AUGUST 3, 2022.	0.30	
07/13/22	CC	FINALIZE AND UPLOAD ORDER GRANTING MOTION TO APPROVE SALE OF ASSETS - CRYSTAL ENDEAVOR.	0.30	
07/13/22	SJC	PREPARE FOR AND ATTEND SALE HEARING IN CONNECTION WITH ENDEAVOR, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, ASSIGNEE'S TEAM, COCOUNSEL IN GIBRALTAR, COUNSEL FOR BUYER REGARDING SAME AND RELATED MATTERS AND CLOSING MATTERS, AND FINALIZE AND SUBMIT DRAFT SALE ORDER AND REVIEW SAME WHEN ENTERED (4.5); REVIEW NOTICE AND AMENDED NOTICE OF HEARING REGARDING EMPLOYMENT OF GIBRALTAR COUNSEL AND COMMUNICATIONS REGARDING SAME (.2).	4.70	
07/14/22	IMH	ANALYSIS OF PROPOSAL BY S LUDINGTON RELATED	1.50	

F E E S

Date	Attorney	Description	Hours
		TO SEARCH TERMS FOR STREAMLINED DISCOVERY IN FORESTERS LITIGATION (.4); WORK WITH E-DISCOVERY TEAM REGARDING SAME (.4); PREPARE FOR 7/15 CASE MANAGEMENT CONFERENCE INVOLVING SAME (.7)	
07/14/22	DL	REVIEW AND RESPOND TO MEMOS, COLLABORATE RE COMPILING APA, BILL OF SALE, SALE ORDER AND WIRE INSTRUCTIONS, EXPEDITE CLOSING (.4); DRAFT, REVISE AND SEND PROPOSED CLOSING INSTRUCTION MEMO, ETC (.2); REVIEW AND COMMENT UPON, CORRECT ATTACHMENTS (.2), FOLLOW UP THROUGH TO ASSURE FUNDING, ETC (.2)	1.00
07/14/22	CC	WORK ON E-BINDER FOR JULY 15, 2022 INITIAL CASE MANAGEMENT CONFERENCE (FORESTERS ADV.).	1.00
07/14/22	CC	WORK ON MOTION FOR APPROVAL OF PAYMENT OF FEES AND EXPENSES OF BERGER SINGERMAN.	0.40
07/14/22	SJC	COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND ASSIGNEE'S TEAM REGARDING ESI AND SEARCH TERMS AND PREPARE FOR INITIAL CASE MANAGEMENT CONFERENCE (1.2); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, ASSIGNEE'S TEAM, GIBRALTAR COCOUNSEL, AND BUYER COUNSEL REGARDING FUNDING ISSUES AND CLOSING OF ENDEAVOR DEAL AND RELATED MATTERS, AND PREPARE FINAL CLOSING DOCUMENTS (3.5); COMMUNICATIONS WITH ASSIGNEE AND DUTCH TRUSTEE REGARDING DUTCH ISSUES (.1); FINALIZE AND SUBMIT ORDER CANCELLING INTERIM CASE MANAGEMENT CONFERENCE IN MAIN CASE (.1).	4.90
07/15/22	IMH	REVIEW ADDITIONAL MATERIALS FOR TODAY'S CASE MANAGEMENT CONFERENCE FOR THE FORESTERS DISPUTE AND TEAM DISCUSSIONS REGARDING STREAMLINED SCOPE OF FORESTERS' RENEWED AND NEW DISCOVERY REQUESTS (.8); CONTINUE WORK ON SUBMISSIONS IN SUPPORT OF FEE REQUESTS OF ASSIGNEE'S PROFESSIONALS (.5)	1.30
07/15/22	CC	WORK ON MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY BERGER SINGERMAN LLP.	0.50
07/15/22	CC	REVIEW AND REDACT BSLLP INVOICES IN PREPARATION OF FIRST INTERIM FEE APPLICATION.	1.20
07/15/22	SJC	CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH COUNSEL FOR CREDITOR AND ASSIGNEE REGARDING NOTICE AND CLAIMS ISSUES (.4); PREPARE FOR AND ATTEND INITIAL CASE MANAGEMENT CONFERENCE AND	3.40

F E E S

Date	Attorney	Description	Hours
		COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND ASSIGNEE'S TEAM REGARDING VARIOUS E-DISCOVERY ISSUES, CASE MANAGEMENT CONFERENCE, AND CASE MANAGEMENT REPORT (2.8); REVIEW ORDER CANCELLING INTERIM CASE MANAGEMENT CONFERENCE IN MAIN CASE AND COMMUNICATIONS REGARDING SAME (.1); COMMUNICATIONS REGARDING CLOSING OF ENDEAVOR SALE (.1).	
07/17/22	SJC	COMMUNICATIONS WITH TEAM REGARDING ENDEAVOR SALE CLOSING AND RELATED MATTERS	0.30
07/18/22	PSS	TEAM CALL WITH M. HEALY AND BERGER SINGERMAN TEAM AND NARDELLA TEAM (.4)	0.40
07/18/22	IMH	ATTN TO SILVER SEAS PRESS RELEASE AS IT RELATES TO CLAIM OBJECTIONS AND STRATEGY FOR CONSUMER DEPOSIT CLAIMS (.2); TEAM DISCUSSIONS REGARDING SAME (.2); ATTN TO INQUIRY REGARDING G PITTS REGARDING CLAIMS AND TIMING FOR POTENTIAL DISTRIBUTION (.2); REVISE TEAM TASK LIST FOR TODAY'S HANDS ON CALL (.1); FURTHER TAILOR SEARCH TERMS FOR DOCUMENT REQUEST BY FORESTERS AND STRATEGIZE WITH ASSIGNEE REGARDING NEXT STEPS (.3); PARTICIPATE IN WEEKLY HANDS ON CALL WITH COUNSEL AND ASSIGNEE AND ATTN TO FOLLOW UP AGENDA ITEMS(.6)	1.60
07/18/22	DL	REVIEW AND RESPOND TO MEMOS RE RCCL BUYING CRYSTAL DEPOSITS, MEMOS RE EFFECT ON CREDIT CARD RESERVE RECONCILIATIONS, ETC	0.60
07/18/22	CC	PREPARE LETTER TO [REDACTED] RE DELETION OF EVALUATION MATERIAL PURSUANT TO NDA.	0.30
07/18/22	CC	UPDATE TASK LIST.	0.40
07/18/22	CC	ATTEND TEAM STATUS CALL.	0.60
07/18/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, ASSIGNEE'S TEAM, AND COCOUNSEL REGARDING CLOSING OF ENDEAVOR SALE, OTHER SALE AND NON-DISCLOSURE ISSUES, CREDITOR INQUIRIES, PENSION ISSUES, AND POST-PETITION LITIGATION, FEE APPLICATIONS, AND OTHER CASE MATTERS (2.5); REVIEW DRAFT MOTION AND ORDER FROM C BREIER REGARDING MOTION FOR CLARIFICATION AND COMMUNICATIONS WITH ASSIGNEE AND M EDELBOIM REGARDING SAME (.5); DRAFT AND SEND NOTICE TO DESTROY DATA TO POTENTIAL PURCHASER AND COMMUNICATIONS	4.20

F E E S

Date	Attorney	Description	Hours
		REGARDING SAME (.4); COMMUNICATIONS WITH COUNSEL FOR FORESTERS, TEAM, AND ASSIGNEE'S TEAM REGARDING FORESTERS DISCOVERY AND VARIOUS ESI ISSUES (.8).	
07/19/22	IMH	REVIEW MOTION TO APPROVE FEES FOR BAHAMIAN COUNSEL (.2); WORK WITH ESI TEAM TO FURTHER NARROW SEARCHES FOR FORESTERS PRODUCTION (.3); REVIEW DOCUMENTS AND TEAM DISCUSSIONS REGARDING PRIORITY CLAIM PAYMENTS AND OBJECTIONS (.4);	0.90
07/19/22	GL	ADDRESS ISSUES RELATED TO ROYAL PRESS RELEASE, USE OF CRYSTAL NAME, AND CUSTOMER LIST ISSUES.	0.50
07/19/22	SJC	WORK ON FEE APPLICATIONS AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (.7); COMMUNICATIONS WITH ASSIGNEE, COUNSEL FOR PBGC AND TEAM REGARDING PENSION ISSUES (.1); COMMUNICATIONS WITH COCOUNSEL AND COUNSEL FOR C BREIER REGARDING MOTION FOR CLARIFICATION, REVIEW DOCUMENTS IN CONNECTION WITH SAME, AND REVISE MOTION AND ORDER AND CIRCULATE SAME (.8); COMMUNICATIONS WITH TEAM REGARDING FORESTERS ESI REVIEW (.1); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH D GRAMMES AND TEAM REGARDING DEMAND LETTERS, CASE STATUS, AND OTHER RELATED MATTERS (.6).	2.30
07/20/22	IMH	FOLLOW UP REGARDING STATUS OF PENDING SUPPLEMENTAL PROCEEDINGS, INCLUDING UPCOMING CASE MANAGEMENT CONFERENCES AND CLAIMS FILED BY PETITIONERS (.3); DISCUSSION WITH CLERK'S OFFICE REGARDING JULY CASE MANAGEMENT CONFERENCE IN MAIN CASE (.2); STRATEGIZE AND REVIEW DOCUMENTS REGARDING ABILITY TO MAKE PARTIAL PRODUCTION IN FORESTERS (.3); TEAM EMAILS REGARDING MOTION TO APPROVE FEE APPLICATIONS FOR ASSIGNEE'S PROFESSIONALS (.2)	1.00
07/20/22	DL	REVIEW AND RESPOND TO MEMOS RE RCCL BUYING CRYSTAL DEPOSITS, MEMOS RE EFFECT ON CREDIT CARD RESERVE RECONCILIATIONS, ETC	0.20
07/20/22	CC	WORK ON MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY BERGER SINGERMAN.	1.00
07/20/22	CC	PREPARE MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY PARRISWHITTAKER..	0.80
07/20/22	CC	CONTINUE REDACTING BERGER SINGERMAN	0.40

F E E S

Date	Attorney	Description	Hours	
		INVOICES FOR FIRST INTERIM FEE APPLICATION.		
07/20/22	SJC	COMMUNICATIONS WITH ASSIGNEE'S TEAM, TEAM, AND COUNSEL FOR FORESTERS REGARDING ESI ISSUES (.3); COMMUNICATIONS WITH ASSIGNEE AND COUNSEL FOR PBGC REGARDING PENSION ISSUES (.1)	0.40	
07/20/22	DAF	RECEIPT AND REVIEW OF EMAILS FROM S. CAPUANO, D. LAMPERT AND C. CHAN-PAK; PREPARE EMAIL TO C. CHAN-PAK ENCLOSING ASSEMBLED CLOSING BINDER [.3 NO CHARGE].	0.00	N/C
07/21/22	IMH	REVIEW STATUS OF CEYHAN LITIGATION INCLUDING WHETHER SUMMONS SERVED AND PROCEDURE FOR DISMISSING SAME	0.30	
07/21/22	SJC	COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND ASSIGNEE'S TEAM REGARDING ESI AND SEARCH TERMS (.6); COMMUNICATIONS WITH MEDELBOIM REGARDING PROPOSED REVISIONS TO MOTION FOR CLARIFICATION REGARDING STAY (.3); REVISE FEE APPLICATION TEMPLATE FOR PROFESSIONALS AND COMMUNICATIONS WITH TEAM, ASSIGNEE, AND CO-COUNSEL REGARDING SAME AND RELATED MATTERS (1.5); COMMUNICATIONS WITH TEAM REGARDING FILINGS AGAINST ASSIGNOR (.2).	2.60	
07/22/22	IMH	WORK ON CATEGORIES OF DOCUMENTS TO BE PRODUCED TO FORESTERS INCLUDING TEAM DISCUSSIONS AND REVIEW OF DOCUMENTS FROM ASSIGNEE (.5); REVISE GLOBAL MOTION RELATED TO PROFESSIONAL FEE REQUESTS (.2)	0.70	
07/22/22	CC	UPDATE TASK LIST.	0.30	
07/22/22	CC	PREPARE, FINALIZE AND SERVE LETTERS TO ALL PROFESSIONALS IN CASE RE UPCOMING PREPARATION OF FIRST INTERIM FEE APPLICATIONS.	1.00	
07/22/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, AND MOST RETAINED PROFESSIONALS IN CASE REGARDING FEE APPLICATIONS AND RELATED MATTERS (1.1); CONTINUE WORKING ON BERMUDA AFFIDAVIT AND RESEARCH IN CONNECTION WITH SAME (.7)	1.80	
07/25/22	PSS	STATUS CALL WITH ASSIGNEE AND CO-COUNSEL (.7)	0.70	
07/25/22	IMH	ANALYSIS IN SUPPORT OF OPEN ISSUES FOR BAHAMAS FEE APPLICATION AND COMMUNICATE WITH A ROSE REGARDING SAME (.4); DISCUSSION WITH ASSIGNEE REGARDING CLAIMS ANALYSIS AND POTENTIAL TIMING FOR OBJECTIONS (.2); REVISE TASK LIST FOR WEEKLY CALL WITH ASSIGNEE AND HIS PROFESSIONALS (.2); PARTICIPATE IN SAME (.6)	1.40	

F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
07/25/22	CJ	COMMUNICATIONS FROM/TO IH, RE: PROPER APPROACH FOR NON-US COUNSEL ON CASE ISSUE (.20) AND SEPARATE RESEARCH (.10) [.3 NO CHARGE]	0.00	N/C
07/25/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING CLAIMS REVIEW AND ANALYSIS, FORESTERS MATTER, PBGC ISSUES, CREDIT CARD ISSUES, LEASE AND LANDLORD MATTERS, TRAVEL INSURANCE, BREIER LITIGATION, MARITIME ATTACHMENT ISSUES, AND OTHER CASE MATTERS (1.7); COMMUNICATIONS WITH COCOUNSEL IN BAHAMAS REGARDING FEE APPLICATION (.1); COMMUNICATIONS WITH COCOUNSEL IN BERMUDA REGARDING STATUS OF PROCEEDINGS AND RECOGNITION IN BERMUDA, AS WELL AS POTENTIAL CLAIMS AGAINST THIRD PARTIES (.3); COMMUNICATIONS WITH COUNSEL IN GIBRALTAR AND TEAM REGARDING FEE APPLICATION ISSUES (.4); REVIEW MOTION TO REJECT LEASE AND COMMUNICATIONS WITH COCOUNSEL REGARDING PROPOSED CHANGES TO SAME (.3); REVIEW AND REVISE MOTION AND ORDER REGARDING CLARIFICATION OF STAY IN CONNECTION WITH C BREIER LITIGATION AND COMMUNICATIONS WITH COUNSEL REGARDING SAME AND HEARING (.7); COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CONSUMER CREDITOR ISSUES (.2); COMMUNICATIONS WITH COUNSEL FOR LENDER IN ENDEAVOR DEAL REGARDING CLOSING (.1).	3.80	
07/26/22	IMH	REVIEW MATERIALS PROVIDED BY PROFESSIONALS IN SUPPORT OF FEE APPLICATIONS (.2); EMAILS WITH ASSIGNEE REGARDING STATUS OF OPEN PRODUCTION REQUESTS (.2); TEAM DISCUSSIONS REGARDING PLAN FOR COMPLYING WITH REVISED DISCOVERY SCHEDULE IN FORESTERS (.2)	0.60	
07/26/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH COUNSEL FOR FORESTERS, ESI TEAM AND ASSIGNEE'S TEAM REGARDING ESI AND SEARCH TERMS (.7); WORK ON AFFIDAVIT FOR RECOGNITION IN BERMUDA AND COMMUNICATIONS WITH BERMUDA COCOUNSEL REGARDING SAME (.7); COMMUNICATIONS WITH TEAM REGARDING CLOSING BINDER FOR HERITAGE DEAL (.1); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING PENSION ISSUES, CLAIMS ISSUES, AND OTHER CASE MATTERS (.7); COMMUNICATIONS WITH COUNSEL FOR C BREIER REGARDING MOTION FOR CLARIFICATION REGARDING STAY AND HEARING ON SAME (.3)	2.50	
07/26/22	JGT	COMMUNICATING ADVICE TO THE LITIGATION TEAM	0.10	

F E E S

Date	Attorney	Description	Hours
		RE: DISCOVERY QUESTIONS.	
07/27/22	PSS	TELEPHONE CALL WITH DEPOSIT CREDITOR AND MEMO TO S. CAPUANO RE SAME	0.10
07/27/22	IMH	TEAM ESI MEETING REGARDING ADDITIONAL SEARCH TERMS FOR FORESTERS PRODUCTION (.3); STRATEGIZE REGARDING PBGC CLAIMS, STATUS AND NEXT STEPS (.2); RESEARCH REGARDING SAME (.8)	1.30
07/27/22	SJC	PREPARE FOR AND ATTEND CONFERENCE CALL WITH PENSION BENEFIT GUARANTY CORPORATION AND ASSIGNEE REGARDING ASSIGNOR PENSION PLAN, TERMINATION, PROOFS OF CLAIM, AND RELATED ISSUES, AND CONFERENCE CALLS AND COMMUNICATIONS WITH TEAM REGARDING SAME AND RESEARCH, AND REVIEW OF SUPPLEMENTAL DOCUMENT AND INFORMATION REQUEST FROM PBGC (2.2); COMMUNICATIONS WITH COCOUNSEL IN BERMUDA REGARDING RECOGNITION (.1); COMMUNICATIONS WITH COCOUNSEL IN BAHAMAS REGARDING FEE APPLICATION (.2); CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH ESI TEAM AND ASSIGNEE'S TEAM REGARDING FORESTERS MATTER AND ESI ISSUES AND COMMUNICATIONS WITH TEAM REGARDING SAME (.9); COMMUNICATIONS WITH COUNSEL FOR C BREIER REGARDING CASE STATUS (.1).	3.50
07/27/22	JGT	CALL WITH THE CLIENT AND THE LITIGATION TEAM RE: DOCUMENT COLLECTIONS AND THEN COMMUNICATING WITH SEVERAL INTERNAL TEAMS ON THE NEXT STEPS.	0.90
07/28/22	IMH	TEAM DISCUSSIONS AND ANALYSIS REGARDING PRIORITY RECOGNITION IN THE ASSIGNMENT STATUTE AND CLAIMS BY THE PBGC (.3); WORK WITH ESI TEAM TO PREPARE INITIAL RESPONSE TO G FREEDMAN REGARDING SCOPE OF DISCOVERY IN FORESTERS (.3)	0.60
07/28/22	JLH	COPY ESI DATA TO SERVER FOR PROCESSING	6.00
07/28/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING ISSUES WITH NDAS, SALES, AND RELATED ISSUES (1.2); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH COUNSEL FOR FORESTERS, ASSIGNEE'S TEAM AND ESI TEAM REGARDING FORESTERS DISCOVERY ISSUES INCLUDING REQUEST FOR ADDITIONAL INFORMATION REGARDING SEARCH RESULTS (1.3); COMMUNICATIONS WITH COCOUNSEL IN BAHAMAS REGARDING FEE APPLICATION (.1); COMMUNICATIONS WITH TEAM REGARDING PBGC	2.90

F E E S

Date	Attorney	Description	Hours	
		CLAIMS AND OTHER ISSUES (.3)		
07/28/22	JGT	CALLS WITH THE LITIGATION AND THE DISCOVERY TEAMS AND THEN DRAFTING MODIFIED SEARCH TERM INSTRUCTIONS FOR THE TEAMS, AS WELL AS COORDINATING WITH FORT LAUDERDALE OFFICE ON DATA DRIVES.	1.60	
07/29/22	JLH	PROCESS CLIENT ESI AND UPLOAD TO ECLIPSE	6.50	
07/29/22	SJC	COMMUNICATIONS WITH COUNSEL FOR C BREIER REGARDING CASE STATUS (.3); COMMUNICATIONS WITH TEAM REGARDING PBGC REQUESTS (.2); COMMUNICATIONS WITH TEAM REGARDING FEE APPLICATION ISSUES (.2); COMMUNICATIONS WITH TEAM REGARDING INTERIM REPORT (.2)	0.90	
07/29/22	JGT	WORKING WITH THE DISCOVERY TEAM ON PROGRESS RE: DOCUMENT COLLECTIONS AND PREPARING INTERNAL FIELDS AND LAYOUTS IN ECLIPSE IN PREPARATION FOR DOCUMENT REVIEW.	0.80	
07/30/22	JLH	PROCESS CLIENT ESI AND UPLOAD TO ECLIPSE	4.00	
07/31/22	JLH	PROCESS CLIENT ESI AND UPLOAD TO ECLIPSE	2.50	
07/31/22	MAC	INITIAL REVIEW OF POC AND PBGC ERISA PROVISIONS RE: POC IN ABC [.4 NO CHARGE].	0.00	N/C
Total Hours:			174.30	
Total Fees:			85,572.00	

F E E S U M M A R Y

Attorney	Hours	Rate	Total
Samuel J. Capuano	83.50	525.00	43,837.50
Christa K. Chanpak	0.00	0.00	0.00
Michael A. Clinch	0.00	0.00	0.00
Carmen Cruz	19.00	265.00	5,035.00
Deborah Fanich	0.00	0.00	0.00
Arturo Fernandez	6.00	275.00	1,650.00
Jeffrey L. Hajny	19.00	265.00	5,035.00
Ilyse M. Homer	21.40	595.00	12,733.00
Christopher Jarvinen	0.00	0.00	0.00
Daniel Lampert	19.00	730.00	13,870.00
Geoffrey Lottenberg	0.50	550.00	275.00

FEE SUMMARY

Attorney	Hours	Rate	Total
Paul S. Singerman	2.50	765.00	1,912.50
Jessie G. Torres	3.40	360.00	1,224.00
Total	174.30		\$85,572.00

EXPENSES

Date	Description	Amount
	CONFERENCE CALL CHARGES	203.82
	E-DISCOVERY DATA STORAGE FEE (\$12 PER GB)	1,668.00
	REPRODUCTION	10.50
	WESTLAW CHARGES	14.34
	Total Expenses	\$1,896.66

CURRENT BALANCE DUE **\$87,468.66**

EXHIBIT B
(Proposed Order)

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

In re:

COMPLEX BUSINESS LITIGATION
DIVISION

CRYSTAL CRUISES LLC, a California
limited liability company,

Case No. 2022-002742-CA-01
Lead Case

CRYSTAL HOLDINGS U.S., LLC, a
Delaware limited liability company,

Case No. 2022-002757-CA-01

CRYSTAL AIRCRUISES, LLC, a Florida
limited liability company, and

Case No. 2022-002758-CA-01

Assignors,
To:

(Jointly Administered Cases)

MARK C. HEALY,

Assignee.
_____/

**ORDER GRANTING MOTION FOR APPROVAL AND
PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES
INCURRED BY BERGER SINGERMAN LLP AS COUNSEL TO THE
ASSIGNEE FOR THE PERIOD FEBRUARY 16, 2022 THROUGH JULY 31, 2022**

THIS CAUSE came before the Court without a hearing upon the *Motion for Approval and Payment of Fees and Reimbursement of Expenses Incurred by Berger Singerman LLP as Counsel to the Assignee for the Period February 16, 2022 Through July 31, 2022* (the “Motion”), filed on negative notice by Mark C. Healy (the “Assignee”), solely in his capacity as the Assignee for the benefit of creditors of Crystal Cruises LLC, Crystal Holdings U.S. LLC, and Crystal AirCruises LLC (collectively, the “Assignors”), pursuant to which Berger Singerman LLP seeks compensation in the amount of \$546,993.50 and reimbursement of expenses in the amount of \$6,410.71, for a total interim award of \$553,404.21, for the period of February 16, 2022 through July 31, 2022. The Court, having considered the Motion and the record in this proceeding, noting

that no objections to the Motion have been filed, finding that notice of the Motion was sufficient, and good cause appearing, it is hereby

ORDERED that:

1. The Motion is **GRANTED**.
2. Berger Singerman, LLP, as counsel to the Assignee, is awarded fees in the amount of \$546,993.50 and expenses in the amount of \$6,410.71, for a total award of \$553,404.21, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Berger Singerman LLP the sum of \$553,404.21.
4. In making the foregoing award, the Court finds that the amounts awarded represent reasonable compensation for actual and necessary services rendered and expenses incurred by Berger Singerman LLP for the benefit of the assignment estate.

DONE AND ORDERED in Chambers, at Miami-Dade County, Florida on this ___ day of _____, 2022.

HONORABLE ALAN FINE
Circuit Court Judge

Copies furnished to:

Counsel of record