

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 AUGUST 1, 2022 THROUGH DECEMBER 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 or hearing unless a party in interest files an objection within 21 days from the date this paper is served. 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), and the Court’s *Order Granting Assignee’s Motion for Entry of an Order: (1) Approving Noticing Procedures, (2) Approving Proof of Claim Forms; and (3) Extending Deadline to Serve Notice of Assignment* (the “Notice Procedures Order”) entered on March 3, 2022, files this motion (the “Motion”) for approval and payment of fees in the amount of \$340,676.25 and reimbursement of expenses in the amount of \$18,245.36 for a total award of \$358,921.61 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 Aircruises LLC (“Crystal Aircruises”, and, together with Crystal Cruises and Crystal Holdings, collectively, the “Assignors”) during the period of August 1, 2022 through December 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 Aircruises 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.

3. 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.

4. 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.

5. As a result of extensive efforts by the Applicant during the Application Period, the Assignee negotiated a settlement and release with the Pension Benefit Guaranty Corporation (the “PBGC”) that will result in the reduction of secured and priority claims in these cases in the amount of several million dollars, which funds will be freed up for distribution to other priority creditors in this case, including consumer and employee wage creditors. Specifically, the PBGC filed nine proofs of claim against the Assignors in excess of \$3.7 million in aggregate liquidated claims *per Assignor*, plus an unknown amount of additional unliquidated claims, each with differing levels of secured and priority status pursuant to Fla. Stat. §§ 727.114(1)(a) (*secured claims*); 727.114(1)(b) (*administrative expense claims*); 727.114(1)(c) (*governmental unit claims*), and 727.114(1)(d) (*claims for contributions to an employee benefit plan*), as well as a variety of federal statutes. Due to the extensive research and negotiations with the PBGC over several months, the PBGC’s claims will be reduced to a single priority claim in the amount of \$150,000, and a general unsecured claim for the balance. Through this settlement and release, in excess of *at least* \$3.5 million will become available for distribution to other priority creditors including consumer creditors.

6. The Applicant has also expended a significant amount of time litigating and defending the supplemental proceeding filed by The Independent Order of Foresters (“Foresters”) against the Assignee, Case No. 2022-6401-CA-01 (the “Foresters Case”). This includes, *inter alia*, preparing responses and reviewing and producing responsive documents and ESI to three requests

for production served upon the Assignee by Foresters, as well as extensive discussions and meet-and-confer sessions with counsel for Foresters relating to the discovery and other matters. The Applicant prepared and filed a Motion for Protective Order, which was extensively litigated at various hearings. To date, the Assignee has produced over 100,000 pages of documents to Foresters, and discovery in the Foresters Case continues.

7. Further, in the Foresters Case, the Applicant prepared and filed a Motion for Summary Judgment in an effort to provide for an early disposition of the Foresters Case. The Motion for Summary Judgment will be heard after the close of discovery in the Foresters Case.

8. As of January 9, 2023, the current cash balance in the estates is \$13,008,511.74 (the “Estate Funds”).

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

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

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

(c) prepared for and attended status calls with the Assignee on a weekly basis with his team to discuss all matters affecting the administration of the Assignors’ estates;

(d) assisted the Assignee in the evaluation of various claims filed against the 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, foreign fiduciaries, and governmental agencies regarding claims issues and other issues;

(g) Engaged with travel insurance companies; and

(h) prepared and filed several motions for approval of payment of the fees of the Assignee and his professionals, attended the related hearing, and prepared and uploaded orders granting these motions.

10. The Applicant, as counsel to the Assignee, has incurred fees in the amount of \$340,676.25 for legal services provided to the Assignee during the Application Period as identified in the chart below and expenses in the amount of \$18,245.36 (for a total of \$358,921.61) 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**

<b>Partners/Associates &amp; Paraprofessionals</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Paul Steven Singerman	3.10	\$765.00	\$2,371.50
Ilyse M. Homer	147.10	\$595.00	\$87,524.50
Samuel J. Capuano	282.00	\$525.00	\$148,050.00
Jessie G. Torres	14.10	\$360.00	\$5,076.00
Michael Clinch	11.20	\$395.00	\$4,424.00
Carmen M. Cruz	99.30	\$265.00	\$26,314.50
Charles M. Gantz	10.80	\$265.00	\$2,862.00
Jeffrey L. Hajny	5.70	\$265.00	\$1,510.50
E-Discovery/Document Review (multiple professionals)	366.20	\$225.00	\$82,395.00
<b>TOTALS</b>	<b>939.50</b>		<b>\$360,528.00<sup>1</sup></b>

<sup>1</sup> The Applicant provided the Assignee with a \$19,851.75 discount on the amount of time expended on document review in connection with the Foresters Case. Therefore, the Applicant is requesting an award of \$340,676.25 for fees expended during this Application Period.

**SUMMARY OF EXPENSES INCURRED**

Type of Expense	Amount of Expense
Conference Call Charges	\$422.18
Reproductions/Photocopies	\$36.90
Court Reporter/Transcript Fees	\$375.00
E-Discovery Data Storage Fee	\$17,160.00
Westlaw	\$246.98
PACER charges	\$4.30
<b>Total Expenses</b>	<b>\$18,245.36</b>

11. 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 award of fees in the amount of \$340,676.25 and reimbursement of expenses in the amount of \$18,245.36, for a total of \$358,921.61 for the period of August 1, 2022 through December 31, 2022.

**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 \$340,676.25 and reimbursement of expenses in the amount of \$18,245.36, (iii) authorizing the Assignee to pay the Applicant the sum of \$358,921.61 representing the fees and expenses awarded; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: January 13, 2023

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](mailto:singerman@bergersingerman.com)  
Samuel J. Capuano  
Florida Bar No. 90946  
[scapuano@bergersingerman.com](mailto: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 January 13, 2023 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](mailto:alosey@losey.law); via email to [cbl44@jud11.flcourts.org](mailto: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**

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FORT LAUDERDALE, FLORIDA 33301  
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[WWW.BERGERSINGERMAN.COM](http://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

September 7, 2022  
**Invoice: 256797**

**Client: 30806-0001**

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

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

Fees	144,512.50
*30% Discount on E-Discovery/Doc. Review Team	(19,851.75)
Total Fees	124,660.75
Total Expenses	3,589.79
<b>Current Balance Due</b>	<b>128,250.54</b>

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/](http://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: September 7, 2022  
INVOICE NO. 256797

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

MATTER ID: 30806-0001

**PROFESSIONAL LEGAL SERVICES RENDERED THROUGH: August 31, 2022**

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>	
08/01/22	IMH	REVISE TASK LIST IN PREPARATION FOR TODAY'S TEAM CALL WITH ASSIGNEE (.2); PARTICIPATE IN SAME AND ATTN TO FOLLOW UP ISSUES REGARDING CLAIMS RECONCILIATION PROCEDURES (.5); WORK ON MOTION FOR APPROVAL OF FEES OF ASSIGNEE'S PROFESSIONALS (.3);	1.00	
08/01/22	CC	UPDATE TASK LIST.	0.30	
08/01/22	CC	ATTEND WEEKLY TEAM STATUS CALL.	0.40	
08/01/22	CC	WORK ON MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY PARRISWHITTAKER; PREPARE PROPOSED ORDER GRANTING MOTION.	2.50	
08/01/22	JLH	PROCESS CLIENT ESI AND UPLOAD TO ECLIPSE	2.50	N/C
08/01/22	MAC	INTEROFFICE CONFERENCE (X2) WITH S. CAPUANO RE: PBGC AND POC. PERFORM LEGAL RESEARCH AND ANALYSIS RE: CALCULATION AND PRIORITY OF CLAIMS UNDER FEDERAL AND STATE LAW. PREPARE STATUTORY PROVISION BINDER RE: THREE POC. PREPARE INITIAL MEMO RE: PBGC CLAIMS -- AMOUNT AND PRIORITY. PREPARE SUPPLEMENT MEMORANDA RE: EACH OF THE POC. TRANSMITTAL EMAIL TO S. CAPUANO AND I. HOMER RE: SAME IN PREPARATION FOR CLIENT STATUS MEETING.	6.10	
08/01/22	SJC	MEETING WITH ESI TEAM REGARDING FORESTERS MATTER AND COMMUNICATIONS REGARDING SAME (1.2); CONFERENCE CALLS AND EMAIL	4.80	

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		COMMUNICATIONS WITH TEAM REGARDING PBGC CLAIMS AND RESEARCH, AND REVIEW RESEARCH (1.4); CONTINUE WORKING ON FEE APPLICATIONS FORMS AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.1); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING CLAIMS REVIEW, LEASE REJECTION ISSUES, PENSION ISSUES, FEE APPLICATIONS, AND OTHER CASE MATTERS (1.1).	
08/01/22	JGT	MEETING WITH THE LITIGATION AND DISCOVERY TEAMS ON FORESTER CLAIMS, WORKING IN DATABASE ON INITIAL SEARCH TERMS AND REPORTS, THEN COMMUNICATING WITH VARIOUS TEAMS ON NEXT STEPS.	2.50
08/02/22	IMH	FOLLOW UP WITH ASSIGNEE'S OFFICE REGARDING INTERIM REPORT (.2) MEETING WITH ESI TEAM REGARDING FURTHER STREAMLINED PROCESS FOR RESPONDING TO FORRESTER'S (.3); BEGIN WORKING ON STATUS SECTION FOR NEXT CASE MANAGEMENT REPORT (.8)	1.30
08/02/22	CC	PREPARE SECOND INTERIM CASE MANAGEMENT REPORT.	1.90
08/02/22	CC	CONDUCT CALCULATIONS RE PARRISWHITTAKER FEE APPLICATION; CORRESPOND WITH S. CAPUANO RE SAME.	0.30
08/02/22	CC	CONFER WITH S. CAPUANO AND I. HOMER RE DELIVERABLES.	0.20
08/02/22	MAC	FURTHER REVIEW OF POC RE: PBGC ANALYSIS. PERFORM LEGAL RESEARCH AND ANALYSIS OF RE: DETERMINATION OF PRIORITY. BEGIN EMAIL MEMO RE: REPLY TO S. CAPUANO AND I. HOMER.	2.40
08/02/22	SJC	REVIEW AND PRODUCE DOCUMENTS TO PBGC AND COMMUNICATIONS WITH ASSIGNEE, TEAM, AND PENSION ADMINISTRATOR REGARDING SAME, AND COMMUNICATIONS WITH TEAM REGARDING PENSION RELATED RESEARCH (1.6); MEETINGS, CONFERENCE CALLS, AND EMAIL COMMUNICATIONS WITH ESI TEAM AND COUNSEL FOR FORESTERS REGARDING ESI PROJECT AND ISSUES AND REVISE REVIEW PROTOCOL (2.3); COMMUNICATIONS WITH COUNSEL FOR CREDITOR AND ASSIGNEE REGARDING CONTINUATION OF SERVICES (.2); CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH ASSIGNEE, COCOUNSEL AND TEAM REGARDING FEE APPLICATIONS AND RELATED ISSUES (.5).	4.60
08/02/22	JGT	WORKING WITH THE LITIGATION AND DISCOVERY	3.10

## F E E S

Date	Attorney	Description	Hours	
		TEAMS ON PROTOCOL AND KEYWORD SEARCHES FOR REVIEWING THE FORESTER DOCUMENTS AND MEETING WITH VARIOUS TEAMS.		
08/02/22	MER	REVIEW OF PROTOCOL AND CREATION OF ISSUE LOG.	1.00	N/C
08/02/22	SCJ	REVIEWED PROTOCOL FOR 1L REVIEW.	0.60	
08/02/22	SCJ	CREATED 1L CODING PANEL.	0.60	
08/03/22	JD	TEAM MEETING IN CONNECTION WITH FORESTERS DOCUMENTS REVIEW PROJECT	0.50	
08/03/22	IMH	REVIEW INVOICES RELATED TO PROFESSIONAL TIME FOR FIRST GROUP OF FEE APPLICATIONS AND REVISE SAME (.5)	0.50	
08/03/22	CC	PREPARE MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY PHELPS DUNBAR AND PROPOSED FORM OF ORDER.	1.00	
08/03/22	CC	WORK ON MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY PARRISWHITTAKER.	0.40	
08/03/22	CC	REVIEW BSLLP JULY INVOICE.	0.40	
08/03/22	MAC	RESPONSIVE EMAIL MEMO TO S. CAPUANO AND I. HOMER RE: STRATEGY AND PLANNING AROUND PBGC POCS.	0.40	
08/03/22	SJC	PREPARE FOR AND ATTEND CONFERENCE CALL WITH ESI TEAM REGARDING FORESTERS DOCUMENT REVIEW PROJECT, AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING SAME AND RELATED MATTERS (1.9); CONFERENCE CALL WITH COUNSEL FOR POTENTIAL PURCHASER OF ASSETS REGARDING NDA, DESTRUCTION OF DATA, AND RELATED MATTERS (.3); CONFERENCE CALL WITH COUNSEL FOR C BREIER REGARDING HEARING ON MOTION TO CLARIFY (.1); COMMUNICATIONS WITH TEAM REGARDING PARRISWHITTAKER FEE APPLICATION AND CONTINUE WORKING ON SAME AND OTHER APPLICATIONS (1.1); COMMUNICATIONS WITH COUNSEL FOR CREDITOR AND ASSIGNEE REGARDING CONTINUATION OF SERVICES (.1)	3.50	
08/03/22	JGT	CALL WITH THE LITIGATION AND DISCOVERY TEAMS VIA CONFERENCE CALL, WORKING IN REVIEW PLATFORM DESIGNING WORKFLOW, SEARCHES AND PERSISTENT HIGHLIGHTING, AND ADJUSTING REVIEW SET FOR THE TEAM	2.20	
08/03/22	JGT	REVIEWING OVER 100 FORESTER DOCUMENTS AND ANALYZING THEM FOR RESPONSIVENESS, PRIVILEGE AND CONFIDENTIALITY.	1.60	

## F E E S

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
08/03/22	MER	REVIEW COMPLAINT, RFP AND MEETING WITH BRIEF OVERVIEW OF THE PROTOCOL FOR ESI. REVIEWED HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	6.00
08/03/22	SCJ	KICK OF CALL AND ORIENTATION ON REVIEW FOR 1L DOCUMENTS	1.00
08/03/22	SCJ	REVIEW 1L DOCUMENTS.	5.50
08/04/22	JD	FORESTERS DOCUMENT REVIEW IN CONNECTION WITH FIRST REQUEST FOR PRODUCTION	2.00
08/04/22	IMH	REVIEW LEGAL ANALYSIS REGARDING POTENTIAL PRIORITY CLAIMS AND PREPARE PROPOSED STRATEGY FOR RESOLVING SAME (.8); REVIEW UPDATED BILLINGS FOR ASSIGNEE PROFESSIONALS TO BE INCLUDED IN COURT FILINGS (.7)	1.50
08/04/22	SJC	FINALIZE AND FILE FEE APPLICATION FOR BAHAMAS COUNSEL AND COMMUNICATIONS WITH TEAM AND ASSIGNEE'S REGARDING SAME AND RELATED MATTERS (.8); COMMUNICATIONS WITH BERMUDA COUNSEL REGARDING RECOGNITION AND OTHER CASE MATTERS (.6); REVIEW FEE APPLICATION MATERIALS FROM LOSEY FIRM AND DISCUSSION WITH TEAM REGARDING SAME (.5); COMMUNICATIONS WITH TEAM REGARDING PBGC ISSUES AND DOCUMENT PRODUCTION (.8); REVIEW AND REVISE INTERIM CASE MANAGEMENT REPORT (.8); REVIEW AND REVISE FEE APPLICATION FOR PHELPS DUNBAR (.8); CONFERENCE CALL WITH COUNSEL FOR ROYAL CARIBBEAN REGARDING ITEMS ON BOARD ENDEAVOR, VENDORS, AND RELATED MATTERS, AND EMAIL COMMUNICATIONS WITH ASSIGNEE REGARDING SAME (.7); COMMUNICATIONS WITH DUTCH TRUSTEE REGARDING ACCESS (.1); COMMUNICATIONS WITH ESI TEAM REGARDING FORESTERS DISCOVERY REVIEW PROJECT AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS (.7).	5.80
08/04/22	JGT	CODING APPROXIMATELY 200 FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE WITHIN THE REVIEW DATABASE, AND COMMUNICATING ISSUE LOG QUESTIONS AND ADDING TAGS FOR THE TEAM.	3.10
08/04/22	MER	REVIEWED HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	7.00
08/04/22	SCJ	REVIEWED 500 DOCUMENTS OF FORESTER	9.20

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		DOCUMENTS FOR RELEVANCY AND PRIVACY.	
08/05/22	JD	FORESTERS DOCUMENT REVIEW IN CONNECTION WITH THE FIRST REQUEST FOR PRODUCTION	4.00
08/05/22	IMH	TEAM DISCUSSIONS AND REVIEW DOCUMENTS REGARDING VARIOUS OPEN ISSUES INCLUDING PREPARATION FOR UPCOMING STATUS CONFERENCES, CLAIMS RESOLUTION PROCESS AND ANALYSIS OF DUPLICATE CLAIMS (.6); DISCUSSION WITH ASSIGNEE REGARDING SAME (.2); WORK ON FURTHER NARROWING OF SCOPE OF DISCOVERY REQUESTED BY FORESTERS (.8)	1.60
08/05/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF HEARING (MOTION CALENDAR) ON MOTION FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES TO PARRISWHITTAKER; UPLOAD SUPPORTING DOCUMENTS INTO COURTMAP.	0.40
08/05/22	CC	WORK ON VARIOUS MOTIONS FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF ESTATE PROFESSIONALS INCORPORATING COMMENTS AND INFORMATION RECEIVED.	1.00
08/05/22	CC	WORK ON MOTION FOR APPROVAL OF FEES OF MARK HEALY, AS ASSIGNEE.	0.80
08/05/22	CC	UPDATE FEE APPLICATION CHART.	0.20
08/05/22	CC	OBTAIN HEARING DATE AND PREPARE, FINALIZE AND E-FILE NOTICE OF HEARING (MOTION CALENDAR) ON MOTION TO REJECT UNEXPIRED LEASE (FL).	0.30
08/05/22	SJC	PREPARE FOR AND ATTEND MEET AND CONFER CONFERENCE WITH COUNSEL FOR FORESTERS AND EMAIL COMMUNICATIONS WITH FORESTERS AND ESI TEAM REGARDING SAME AND RELATED MATTERS AND ADDITIONAL REQUESTED SEARCH TERMS (1.0); FINALIZE AND FILE NOTICE OF HEARING AND AFFIDAVIT OF SERVICE OF FEE APPLICATION FOR BAHAMIAN FIRM, AND COMMUNICATIONS WITH TEAM AND K PARRIS-WHITTAKER REGARDING SAME AND RELATED MATTERS (.4); COMMUNICATIONS WITH ROYAL CARIBBEAN COUNSEL REGARDING ENDEAVOR (.1); CONFERENCE CALL WITH ASSIGNEE REGARDING PENSION ISSUES, FEE APPLICATIONS, AND OTHER MATTERS (.5); REVISE SECOND INTERIM CASE MANAGEMENT REPORT (1.8); COMMUNICATIONS WITH BERMUDA COUNSEL REGARDING FEE APPLICATION (.1)	3.90
08/05/22	JGT	CODING HUNDREDS OF FORESTER DOCUMENTS FOR	2.60

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		RELEVANCY AND WORKING WITH THE LITIGATION TEAM ON ADDITIONAL TEAMS TO RUN ACROSS THE DATABASE.	
08/05/22	MER	REVIEWED HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	7.00
08/05/22	SCJ	CODED 400 DOCUMENTS OF FORESTER FOR RELEVANCY AND PRIVILEGE,	7.20
08/08/22	PSS	REVIEW SUMMONSES IN NEW LAWSUITS AND MEMO TO/FROM S. CAPUANO RE SAME (1) STATUS CALL WITH M. HEALY AND M. NARDELLA AND S. CAPUANO AND I HOMER (.9)	1.00
08/08/22	JD	FORESTERS DOCUMENT REVIEW IN CONNECTION WITH THE FIRST REQUEST FOR PRODUCTION	2.00
08/08/22	IMH	REVIEW INVOICES FROM ASSIGNEE'S PROFESSIONALS IN ADVANCE OF SUBMISSION IN SUPPORT OF FEE APPLICATIONS (.4); REVISE MOTION IN SUPPORT OF SAME (.3); FOLLOW UP WITH ASSIGNEE REGARDING INTERIM REPORT (.2) REVISE TEAM STATUS REPORT AND DISCUSSIONS REGARDING SAME (.3); PREPARE FOR AND PARTICIPATE IN HANDS ON MEETING WITH ASSIGNEE AND ATTN TO FOLLOW UP ISSUES(1.3); REVISE PBGC CLAIMS MEMO (.2)	2.60
08/08/22	CC	ATTEND WEEKLY TEAM STATUS CALL.	0.80
08/08/22	CC	UPDATE TASK LIST.	0.30
08/08/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF FILING AFFIDAVIT OF SERVICE OF MOTION FOR APPROVAL AND PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES INCURRED BY PARRISWHITTAKER AND CORRESPONDING NOTICE OF HEARING.	0.30
08/08/22	CC	WORK ON FIRST INTERIM FEE APPLICATIONS OF ASSIGNEE AND HIS PROFESSIONALS.	1.50
08/08/22	CC	WORK ON SECOND INTERIM CASE MANAGEMENT REPORT.	0.30
08/08/22	SJC	FINALIZE AND CIRCULATE SECOND INTERIM CASE MANAGEMENT REPORT AND COMMUNICATIONS REGARDING SAME (1.6); REVIEW INTERIM REPORT FROM ASSIGNEE AND COMMUNICATIONS REGARDING SAME (.2); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ESI TEAM AND COUNSEL FOR FORESTERS REGARDING DISCOVERY DISPUTE, SEARCH TERMS, AND ONGOING REVIEW, AND REVIEW CERTAIN DOCUMENTS (1.1); COMMUNICATIONS WITH TEAM REGARDING	4.50

## F E E S

Date	Attorney	Description	Hours
		PROVIDING VARIOUS INSURANCE MATTERS (.3); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, TEAM, AND COCOUNSEL REGARDING CLAIMS ANALYSIS AND OTHER ISSUES, LEASE REJECTIONS ISSUES, CREDIT CARD ISSUES, BERMUDA ISSUES, FEE APPLICATIONS, AND OTHER CASE MATTERS (1.3).	
08/08/22	JGT	CODING HUNDREDS OF FORESTER DOCUMENTS FOR RELEVANCY AND WORKING WITH THE LITIGATION TEAM ON ADDITIONAL TEAMS TO RUN ACROSS THE DATABASE.	2.50
08/08/22	MER	REVIEWED HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION. EMAIL TO S. CAPUANO WITH QUESTION ON ESCROW DOCUMENT AND UPDATED ISSUE LOG.	7.00
08/08/22	SCJ	REVIEWED AND CODED 400 OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	6.70
08/09/22	JD	FORESTER DOCUMENT REVIEW IN CONNECTION WITH FIRST REQUEST FOR PRODUCTION	2.50
08/09/22	IMH	ATTENTION TO SECOND TIER REVIEW INQUIRIES BY DOCUMENT REVIEW TEAM FOR FORESTERS PRODUCTION (.4); STRATEGIZE REGARDING POSSIBILITY OF ROLLING PRODUCTION (.2); FOLLOW UP WITH ASSIGNEE REGARDING SAME (.2); REVISE NOTICE LETTER TO INSURERS RELATED TO CERTAIN EMPLOYEE CLAIMS (.2)	1.00
08/09/22	CC	PREPARE MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY INCE (GIBRALTAR) LIMITED AND PROPOSED FORM OF ORDER.	1.00
08/09/22	CC	REVIEW INSURANCE POLICES RECEIVED FROM MOECKER.	0.40
08/09/22	SJC	MEETINGS AND COMMUNICATIONS WITH TEAM AND COCOUNSEL REGARDING VARIOUS FEE APPLICATION RELATED ISSUES (.8); CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH COUNSEL FOR FORESTERS, TEAM AND ESI TEAM REGARDING DISCOVERY DISPUTE, SEARCH TERMS, REVIEW, AND OTHER RELATED MATTERS (.9); COMMUNICATIONS WITH ASSIGNEE'S TEAM AND TEAM REGARDING INSURANCE ISSUES (.2); COMMUNICATIONS WITH COUNSEL FOR CREDITOR REGARDING CASE STATUS (.1).	2.00
08/09/22	JGT	CODE HUNDREDS OF FORESTER DOCUMENTS FOR RELEVANCY AND WORKING WITH THE LITIGATION	2.10



## F E E S

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		TEAM ON QUESTIONS FROM THE REVIEW TEAM.	
08/09/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	7.00
08/09/22	SCJ	REVIEWED AND CODED 250 OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	4.70
08/10/22	JD	FORESTERS DOCUMENT REVIEW IN CONNECTION WITH FIRST REQUEST FOR PRODUCTION	1.00
08/10/22	IMH	WORK ON SUBMISSION IN SUPPORT OF CASE MANAGEMENT CONFERENCE (.3); REVISE LETTER TO INSURERS RELATED TO EMPLOYEE CLAIMS (.2); REVISE NARRATIVE IN SUPPORT OF INTERIM REPORT (.2); STRATEGIZE REGARDING OPEN ISSUES RELATED TO FEE APPLICATIONS (.3);	1.00
08/10/22	CC	WORK ON MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY INCE (GIBRALTAR) LIMITED.	0.40
08/10/22	CC	WORK ON SECOND INTERIM CASE MANAGEMENT REPORT.	0.60
08/10/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING INTERIM CASE MANAGEMENT REPORT AND INTERIM REPORT (.8); REVIEW AND REVISE FEE APPLICATIONS FOR VARIOUS PROFESSIONALS AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (2.1); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ESI TEAM REGARDING FORESTERS DOCUMENT REVIEW (.6).	3.50
08/10/22	JGT	CODE HUNDREDS OF FORESTER DOCUMENTS FOR RELEVANCY AND WORKING WITH THE LITIGATION TEAM ON QUESTIONS FROM THE REVIEW TEAM.	2.20
08/10/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	6.00
08/10/22	SCJ	REVIEW AND CODE 300 OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	4.30
08/11/22	IMH	FOLLOW UP REGARDING STATUS OF REVIEW BY E-DISCOVERY TEAM OF DOCUMENTS TO BE PRODUCED TO FORESTERS AND OPEN ISSUES RELATED TO SAME (.4); COMMUNICATE WITH ASSIGNEE REGARDING REVISIONS TO INTERIM REPORT AND FINALIZE SAME (.4); REVISE NOTICE TO TO INSURER OF CLAIMS FILED BY VARIOUS INSURED (.2); NUMEROUS TEAM COMMUNICATIONS REGARDING FEE APPLICATIONS FOR ASSIGNEE'S PROFESSIONALS AND REVIEW AND	2.90

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		REVISE MULTIPLE DRAFTS OF SAME (1.9)	
08/11/22	CC	REVIEW EMPLOYEE PRACTICES INSURANCE POLICY; PREPARE LETTER TO BEAZLEY INSURANCE COMPANY RE NOTICE OF LAWSUIT OF MIRKO LAPTALO.	0.80
08/11/22	CC	WORK ON SECOND INTERIM CASE MANAGEMENT REPORT; CONFER WITH I. HOMER RE SAME.	0.70
08/11/22	CC	WORK ON VARIOUS MOTIONS TO APPROVE PAYMENT OF FEES AND EXPENSES OF ASSIGNEE'S PROFESSIONALS.	1.50
08/11/22	JGT	CODE HUNDREDS OF FORESTER DOCUMENTS FOR RELEVANCY AND WORKING WITH THE LITIGATION TEAM ON QUESTIONS FROM THE REVIEW TEAM.	2.60
08/11/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	8.00
08/11/22	SCJ	REVIEW AND CODED 400 OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	5.30
08/12/22	JD	FORESTERS DOCUMENT REVIEW IN CONNECTION WITH FIRST REQUEST FOR PRODUCTION	1.50
08/12/22	IMH	CONTINUE REVIEW AND REVISIONS TO FEE APPLICATIONS FOR ASSIGNEE'S PROFESSIONALS (1.1); STRATEGIZE WITH TEAM REGARDING ADDITIONAL SECOND TIER REVIEW OF FORESTERS DOCUMENTS AND PERFORM SAME (.9)	2.00
08/12/22	CC	WORK ON DRAFTS OF MOTIONS TO APPROVE FEES AND EXPENSES OF ASSIGNEE AND HIS PROFESSIONALS; CONFER WITH I. HOMER RE SAME.	2.50
08/12/22	CC	FINALIZE AND E-FILE SECOND INTERIM CASE MANAGEMENT REPORT; UPLOAD TO COURTMAP FOR 8.17.2022 INTERIM CASE MANAGEMENT CONFERENCE.	1.00
08/12/22	JGT	CODE HUNDREDS OF FORESTER DOCUMENTS FOR RELEVANCY AND WORKING WITH THE LITIGATION TEAM ON QUESTIONS FROM THE REVIEW TEAM.	3.10
08/12/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	4.00
08/12/22	SCJ	REVIEW AND CODE 400 OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	5.50
08/15/22	IMH	PREPARE FOR CASE MANAGEMENT CONFERENCE (1.1); EMAILS WITH ASSIGNEE AND REVISE MULTIPLE FEE APPLICATIONS FOR ASSIGNEE'S VARIOUS	4.00

## F E E S

Date	Attorney	Description	Hours	
		PROFESSIONALS (1.9); EMAILS WITH LOSEY REGARDING HIS SPECIAL COUNSEL APPLICATION (.1); EMAILS WITH J PILL OF PHELPS DUNBAR REGARDING SAME (.2); REVISE CHART OF VARIOUS SPECIAL COUNSEL FEE REQUESTS TO PRESENT IN COURT TO JUDGE FINE (.2); REVISE WORKING TASK LIST FOR NEXT HANDS ON TEAM CALL (.2); DISCUSSIONS WITH E-DISCOVERY TEAM REGARDING ADDITIONAL SEARCHES AND REVIEW AGREED TO FOR FORESTERS REVIEW (.3);		
08/15/22	CC	PREPARE CHART OF STATUS OF PREPARATION AND FILING OF FIRST INTERIM FEE APPLICATIONS.	0.60	
08/15/22	CC	FINALIZE MOTION FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES TO LOSEY PLLC.	0.40	
08/15/22	CC	PREPARE E-BINDER FOR AUGUST 17, 2022 CASE MANAGEMENT CONFERENCE.	0.40	
08/15/22	CC	WORK ON MOTION FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF BERGER SINGERMAN LLP.	0.50	
08/15/22	JGT	WORKING ON SEARCHES, KEYWORD LISTS AND TEAM INSTRUCTIONS FOR ADDITIONAL ~3,000 DOCUMENTS ADDED TO REVIEW SET 2 AND ALSO CODING HUNDREDS OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	3.10	
08/15/22	SCJ	REVIEW AND CODE 250 FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	4.00	
08/16/22	JD	FORESTERS DOCUMENT REVIEW IN CONNECTION WITH FIRST REQUEST FOR PRODUCTION	1.50	N/C
08/16/22	IMH	REVIEW EMAIL ITEMIZATIONS FROM INCE FOR REVISIONS TO FEE APPLICATION FOR SPECIAL COUNSEL (.2); EMAILS WITH ASSIGNEE AND THEAM DISCUSSIONS REGARDING STATUS OF ALL SPECIAL COUNSEL APPLICATIONS (.4); STRATEGIZE WITH S CAPUANO REGARDING MATTERS SET FOR COURT THIS WEEK AND ISSUES RELATED TO HEALY, BERGER SINGERMAN AND NARDELLA FILINGS (.3); STRATEGIZE WITH ASSIGNEE REGARDING DISPUTE WITH LANDLORD AND POTENTIAL RESOLUTION OF SAME (.4); REVISE MATERIALS IN SUPPORT OF CASE MANAGEMENT CONFERENCE (.3); REVIEW DOCKET REGARDING FILINGS AGAINST ASSIGNEE (.1); DISCUSSIONS REGARDING TIMING OF HEARING ON FEE APPLICATIONS (.2)	1.90	
08/16/22	CC	UPDATE TASK LIST.	0.30	
08/16/22	CC	WORK ON MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY INCE (GIBRALTAR) LIMITED.	0.80	

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<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
08/16/22	CC	CONFER WITH S. CAPUANO RE STATUS OF MOTIONS FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF ASSIGNEE AND HIS PROFESSIONALS.	0.20
08/16/22	SJC	CONTINUE WORKING ON FEE APPLICATIONS FOR NARDELLA, INCE, ASSIGNEE, PHELPS, AND OTHERS, AND CONFERENCE CALLS AND COMMUNICATIONS WITH ASSIGNEE, TEAM, AND COCOUNSEL REGARDING SAME (1.8); MEETING AND COMMUNICATIONS WITH ESI TEAM REGARDING FORESTERS DISCOVERY REVIEW (1.6); COMMUNICATIONS REGARDING INTERIM CASE MANAGEMENT REPORT (.4); PREPARE FOR INTERIM CASE MANAGEMENT CONFERENCE (1.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND COCOUNSEL REGARDING LEASE REJECTION MATTERS, ESTATE CLAIMS, AND OTHER MATTERS (1.0); COMMUNICATIONS WITH DUTCH TRUSTEE AND ASSIGNEE REGARDING DUTCH WAREHOUSE (.3); COMMUNICATIONS WITH COUNSEL FOR SALESFORCE AND ASSIGNEE REGARDING DATA (.2)	6.80
08/16/22	JGT	WORKING ON NEW SEARCHES FOR AND MEETING WITH THE LITIGATION TEAM, AND THEN REVIEWING HUNDREDS OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	3.40
08/16/22	SCJ	REVIEW AND CODE 400 OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	6.50
08/17/22	IMH	PREPARE FOR TODAY'S STATUS CONFERENCE (.3); DEBRIEF REGARDING OPEN ISSUES POST CASE MANAGEMENT CONFERENCE (.3); REVISE TEAM TASK LIST (.2); REVIEW PBGC ANALYSIS AND STRATEGIZE REGARDING POTENTIAL DISTRIBUTION (.6); FOLLOW UP RESEARCH REGARDING SAME (.5)	1.90
08/17/22	CC	PREPARE AMENDED MOTION FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF NARDELLA & NARDELLA.	1.00
08/17/22	CC	REVIEW FORESTERS DOCUMENT REVIEW PROTOCOL; CONFER WITH J. TORRES AND S. CHOCRAN RE SAME.	1.00
08/17/22	CC	REVIEW DOCUMENTS FOR RESPONSIVENESS TO FORESTERS' REQUEST FOR PRODUCTION OF DOCUMENTS.	2.10
08/17/22	SJC	PREPARE FOR AND ATTEND INTERIM CASE MANAGEMENT CONFERENCE FOR ASSIGNORS AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (2.5); CONTINUE WORKING ON FEE APPLICATIONS FOR	5.50

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		INCE, LOSEY, AND OTHERS, AND CONFERENCE CALLS AND COMMUNICATIONS WITH TEAM AND COCOUNSEL REGARDING SAME (1.3); COMMUNICATIONS WITH COUNSEL FOR C BREIER REGARDING HEARING ON MOTION FOR CLARIFICATION OF STAY (.2); COMMUNICATIONS WITH POTENTIAL PURCHASER OF ASSETS REGARDING DESTRUCTION OF CONFIDENTIAL DATA (.2); COMMUNICATIONS WITH ESI TEAM REGARDING FORESTERS DISCOVERY MATTERS (.8); REVIEW AND REVISE MOTION TO REJECT FLORIDA LEASE AND COMMUNICATIONS REGARDING SAME (.3); COMMUNICATIONS WITH DUTCH TRUSTEE AND ASSIGNEE REGARDING DUTCH WAREHOUSE (.2);	
08/17/22	JGT	WORK WITH DISCOVERY TEAM ON TRAINING FOR ADDITIONAL DOCUMENTS AND SEARCHES, AND REVIEWING HUNDREDS OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	3.80
08/17/22	SCJ	REVIEW AND CODE 400 OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	6.60
08/18/22	IMH	TEAM DISCUSSIONS AND EMAILS REGARDING POST-CASE MANAGEMENT FILINGS INCLUDING FEE APPLICATIONS OF SPECIAL COUNSEL AND UPDATE ON CLAIMS ADMINISTRATION (.6); ATTN TO SECOND TIER REVIEW OF LATEST FORESTERS SEARCHES (.4)	1.00
08/18/22	CC	FINALIZE MOTIONS FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF ASSIGNEE AND HIS PROFESSIONALS, EXHIBITS AND PROPOSED FORM OF ORDERS.	2.00
08/18/22	CC	PREPARE AMENDED MOTION FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF NARDELLA & NARDELLA.	0.80
08/18/22	CC	REVIEW DOCUMENTS FOR RESPONSIVENESS TO FORESTERS' REQUEST FOR PRODUCTION OF DOCUMENTS.	1.80
08/18/22	SJC	FINALIZE FEE APPLICATIONS FOR ASSIGNEE, NARDELLA, BERGER SINGERMAN, PHELPS, LOSEY, KENNEDYS, AND INCE, AND CIRCULATE SAME TO TEAM, COCOUNSEL, AND ASSIGNEE FOR REVIEW, AND CONFERENCE CALLS AND COMMUNICATIONS WITH TEAM AND COCOUNSEL REGARDING SAME (3.5); MEETING AND COMMUNICATIONS WITH ESI TEAM REGARDING FORESTERS DISCOVERY REVIEW (.9); COMMUNICATIONS WITH TEAM REGARDING CREDITOR INQUIRIES (.1);	4.50
08/18/22	JGT	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR	3.50

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<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>	
		RELEVANCY AND PRIVILEGE WITHIN THE ADDITIONAL SET RECENTLY ADDED AND COMMUNICATE WITH THE REVIEW TEAM ON ISSUE LOG QUESTIONS.		
08/19/22	IMH	PREPARE MATERIALS FOR UPCOMING HEARING ON FEE APPLICATIONS OF ASSIGNEE'S PROFESSIONALS (1.2); TEAM DISCUSSIONS AND WORK ON SUBMISSION FOR JUDGE FINE REGARDING SAME (.5)	1.70	
08/19/22	CC	FINALIZE AND E-FILE MOTIONS FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF ASSIGNEE AND HIS PROFESSIONALS (7 IN TOTAL); SERVE ON CBL AND INTERESTED PARTIES.	2.50	
08/19/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF FILING AFFIDAVIT OF SERVICE OF MOTION FOR APPROVAL AND PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES INCURRED BY ASSIGNEE AND HIS PROFESSIONALS AND CORRESPONDING NOTICE OF HEARING.	0.40	
08/19/22	CC	REVIEW AVAILABLE SPECIAL SET HEARINGS ON COURTMAP; CONFER WITH D. DIAZ OF JUDGE'S CHAMBERS RE SAME; PREPARE, FINALIZE AND E-FILE NOTICE OF HEARING ON MOTIONS FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES TO ASSIGNEE AND HIS PROFESSIONALS (SPECIAL SET HEARING); UPLOAD SUPPORTING DOCUMENTS ON COURTMAP.	1.00	
08/19/22	CC	REVIEW DOCUMENTS FOR RESPONSIVENESS TO FORESTERS' REQUEST FOR PRODUCTION OF DOCUMENTS.	0.80	
08/19/22	SJC	FINALIZE AND FILE ALL FEE APPLICATIONS, NOTICE OF HEARING, AND AFFIDAVIT OF SERVICE OF SAME, AND COMMUNICATIONS WITH TEAM, ASSIGNEE, AND ASSIGNEE'S TEAM REGARDING SAME, HEARING, SERVICE, AND OTHER RELATED MATTERS (2.0); COMMUNICATIONS WITH TEAM REGARDING PENSION RELATED ISSUES AND RESEARCH REGARDING SAME (.6); COMMUNICATIONS WITH CREDITORS REGARDING CLAIMS (.1).	2.70	
08/19/22	JGT	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE WITHIN THE ADDITIONAL SET RECENTLY ADDED AND COMMUNICATE WITH THE REVIEW TEAM.	3.10	
08/19/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	4.00	
08/19/22	CKC	PREPARE CLOSING BINDER.	0.50	N/C

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<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
08/22/22	PSS	STATUS CALL RE OPEN ISSUES	0.50
08/22/22	IMH	COMMUNICATE WITH COURT REGARDING HEARINGS ON 8/25 AND JUDGE'S REQUEST TO CHANGE SAME (.2); REVISE TEAM TASK LIST FOR TODAY'S HANDS ON CALL (.2); PARTICIPATE IN SAME AND ATTN TO FOLLOW UP ISSUES (.9); FOLLOW UP WITH E-DISCOVERY TEAM REGARDING OPEN ISSUES FOR FORESTERS REVIEW (.2); ATTN TO ISSUES REGARDING FORESTERS SECOND ROUND OF DISCOVERY AND DISCUSS OBJECTION TO SAME (.3); CALL WITH ASSIGNEE AND TEAM REGARDING OPEN ISSUES RELATED TO UPCOMING FEE APPLICATION HEARINGS (.3); STRATEGIZE REGARDING LETTER TO PBGC AND ANALYSIS RELATED TO SAME (.8)	2.90
08/22/22	CC	UPDATE TASK LIST.	0.40
08/22/22	CC	ATTEND WEEKLY TEAM STATUS CALL.	0.50
08/22/22	CC	REVIEW REQUEST BY COURT TO CHANGE DATE OF HEARING ON MOTION TO APPROVE PAYMENT OF FEES AND EXPENSES TO PARRISWHITTAKER; REVIEW OPTIONS FOR NEW HEARING; PREPARE, FINALIZE AND E-FILE RE-NOTICE OF HEARING ON; UPLOAD INTO COURTMAP.	1.00
08/22/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF FILING AFFIDAVIT OF SERVICE OF RE-NOTICE OF HEARING ON MOTION FOR APPROVAL AND PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES INCURRED BY PARRISWHITTAKER	0.40
08/22/22	CC	REVIEW DOCUMENTS FOR RESPONSIVENESS TO FORESTERS' REQUEST FOR PRODUCTION OF DOCUMENTS.	2.60
08/22/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CLAIMS ISSUES, FORESTERS MATTER, PBGC, REJECTION OF LEASE ISSUES, FEE APPLICATIONS, AND OTHER MATTERS (1.3); REVIEW AND SUBMIT DISCOVERY TO PBGC AND COMMUNICATIONS WITH PBGC, ASSIGNEE AND TEAM REGARDING SAME AND RELATED PBGC MATTERS (.8); REVIEW AND ANALYZE FORESTERS SECOND REQUEST FOR PRODUCTION AND COMMUNICATIONS WITH TEAM REGARDING SAME (.9); COMMUNICATIONS WITH ESI TEAM REGARDING FORESTERS FIRST REQUEST FOR PRODUCTION (.5); RECEIPT OF DISCOVERY REQUEST FROM GERMAN OWNER OF RIVER SHIP ENTITIES AND SEND RESPONSE, AND COMMUNICATIONS WITH ASSIGNEE REGARDING SAME (.8); COMMUNICATIONS WITH CHAMBERS, TEAM, AND BAHAMAS COUNSEL	5.40

## F E E S

Date	Attorney	Description	Hours	
		REGARDING RESCHEDULED HEARING ON FEE APPLICATIONS AND FINALIZE AND FILE RENOTICE OF HEARING (.6); COMMUNICATIONS WITH OTHER SPECIAL COUNSEL REGARDING HEARING ON FEE APPLICATIONS (.5)		
08/22/22	JGT	REVIEW HUNDREDS OF DOCUMENTS IN THE FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	2.90	
08/22/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	4.00	
08/23/22	IMH	TEAM DISCUSSIONS REGARDING UPCOMING HEARINGS, FILED OBJECTIONS AND POTENTIAL RESOLUTIONS OF SAME (.3)	0.30	
08/23/22	CC	REVIEW DOCUMENTS FOR RESPONSIVENESS TO FORESTERS' REQUEST FOR PRODUCTION OF DOCUMENTS.	4.00	
08/23/22	SJC	PREPARE FOR AND ATTEND CONFERENCE CALL WITH ESI TEAM REGARDING STATUS OF FORESTERS DOCUMENT REVIEW AND RELATED MATTERS (.5); REVIEW NOTICE OF OBJECTION FILED BY CREDITOR AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (.6); CONFERENCE CALLS WITH ASSIGNEE REGARDING VARIOUS CASE MATTERS INCLUDING FORESTERS MATTERS AND PBGC (1.0); COMMUNICATIONS WITH COUNSEL FOR ROYAL CARIBBEAN AND ASSIGNEE REGARDING ENDEAVOR SALE AND RELATED MATTERS (.4); CONFERENCE CALL WITH COCOUNSEL REGARDING TEXAS MATTERS (.5).	3.00	
08/23/22	JGT	CALL WITH THE LITIGATION TEAM RE: NEXT STEPS AND ALSO REVIEWING HUNDREDS OF DOCUMENTS IN THE FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	3.50	
08/23/22	MER	REVIEWED HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	6.00	
08/23/22	DAF	ATTENTION TO REVISING CLOSING BINDER FOR CRYSTAL CRUISES; EMAIL TO C. CHAN-PAK ENCLOSING SAME FOR REVIEW AND COMMENT.	0.80	N/C
08/24/22	PSS	REVIEW OBJECTION TO FEE APPLICATIONS AND MEMOS TO S. CAPUANO	0.10	
08/24/22	IMH	RESEARCH AND ANALYSIS REGARDING SETTLEMENT EMANATING FROM INVESTIGATION BY PHELPS (.3); TEAM DISCUSSIONS REGARDING ADDITIONAL	1.60	



**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		PREPARATION FOR UPCOMING HEARING ON FEE APPLICATIONS FOR ASSIGNEE PROFESSIONALS (.2); PREPARE LETTER TO PBGC ASKING FOR DETAIL ON FILED CLAIMS (.3); TEAM DISCUSSIONS AND FOLLOW UP WITH ASSIGNEE REGARDING POTENTIAL RECOVERIES AND CLAIM ADMINISTRATION (.4); REVISE LETTER TO BEAZLEY INSURANCE (.1)	
08/24/22	CC	REVIEW DOCUMENTS FOR RESPONSIVENESS TO FORESTERS' REQUEST FOR PRODUCTION OF DOCUMENTS.	2.50
08/24/22	MAC	REVIEW AND ANALYSIS OF DRAFT EMAIL TO PBGC COUNSEL AND EMAIL MEMO TO BSLLP TEAM RE: SAME.	0.60
08/24/22	MAC	INTEROFFICE CONFERENCE WITH S. CAPUANO RE: STRATEGY AND ANALYSIS OF PBGC CLAIMS. SUPPLEMENTAL LEGAL RESEARCH IN CONNECTION THEREWITH.	0.90
08/24/22	SJC	DRAFT DISCOVERY REQUESTS TO PBGC, LEGAL AND FACTUAL RESEARCH REGARDING SAME, ANALYZE PBGC PROOFS OF CLAIM, AND COMMUNICATIONS AND MEETINGS WITH TEAM REGARDING SAME (2.6); REVISE AND FINALIZE NOTICE OF CLAIM LETTER TO INSURER AND COMMUNICATIONS WITH TEAM REGARDING SAME (.5);	3.10
08/24/22	JGT	CALL WITH THE LITIGATION TEAM AND ALSO REVIEW HUNDREDS OF DOCUMENTS IN THE FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	3.50
08/24/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	8.00
08/24/22	SCJ	REVIEW AND CODE 400 OF FORESTER DOCUMENTS FOR RELEVANCE AND PRIVILEGE.	5.10
08/25/22	JD	FORESTERS' DOCUMENTS REVIEW IN CONNECTION WITH FIRST REQUEST FOR PRODUCTION	4.00
08/25/22	IMH	ATTN TO QUESTIONS REGARDING SECOND TIER REVIEW OF DOCUMENTS RESPONSIVE TO FORESTERS REQUEST (.2); ATTN TO INQUIRY FROM COURT REGARDING UPCOMING CASE MANAGEMENT CONFERENCES (.2)	0.40
08/25/22	CC	UPDATE TASK LIST.	0.30
08/25/22	SJC	FINALIZE AND SERVE DISCOVERY REQUEST TO PBGC AND COMMUNICATIONS WITH ASSIGNEE AND PBGC REGARDING SAME (1.1); REVIEW NEW DISCOVERY	2.60

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		REQUEST FROM PBGC (.2); RECEIPT OF DISCOVERY REQUEST FROM DUTCH TRUSTEE, COMMUNICATIONS WITH ASSIGNEE, AND SEND RESPONSE (.6); COMMUNICATIONS WITH ASSIGNEE REGARDING STATUS OF TX PROCEEDINGS AND RELATED MATTERS (.5); COMMUNICATIONS WITH SPECIAL COUNSEL REGARDING FEE APPLICATION HEARING (.1); REVIEW ORDER RESCHEDULING CASE MANAGEMENT CONFERENCE (.1).	
08/25/22	JGT	MEETING WITH THE DISCOVERY TEAM ON ASSIGNMENTS AND THEN REVIEWING HUNDREDS OF DOCUMENTS IN THE FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	3.10
08/25/22	MER	REVIEWED HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	7.00
08/25/22	SCJ	REVIEWED AND CODED 500 OF FORESTER DOCUMENTS FOR RELEVANCE AND PRIVILEGE.	7.30
08/26/22	JD	FORESTERS DOCUMENT REVIEW IN CONNECTION WITH FIRST REQUEST FOR PRODUCTION	2.00
08/26/22	IMH	EMAILS AND FOLLOW UP REGARDING OPEN ISSUES ON FORESTERS REVIEW	0.30
08/26/22	CC	REVIEW DOCUMENTS FOR RESPONSIVENESS TO FORESTERS' REQUEST FOR PRODUCTION OF DOCUMENTS.	2.00
08/26/22	MAC	REVIEW OF LABOR CODE AND REGULATIONS RE: VOLUNTARY AND INVOLUNTARY PLAN TERMINATION AND ANALYSIS OF PBGC POCS.	0.80
08/26/22	SJC	RESEARCH REGARDING CLAIM PRIORITY (.5); LEGAL RESEARCH REGARDING PENSION ISSUES AND CONFERENCE WITH TEAM REGARDING SAME (1.0)	1.50
08/26/22	JGT	REVIEW HUNDREDS OF DOCUMENTS IN THE FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	2.20
08/26/22	MER	REVIEWED HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	3.50
08/26/22	SCJ	REVIEW AND CODED 250 OF FORESTER DOCUMENTS FOR RELEVANCE AND PRIVILEGE.	4.20
08/29/22	IMH	REVISE TASK LIST FOR TODAY'S HANDS ON CALL WITH ASIGNEE (.2); RESEARCH AND STRATEGIZE REGARDING CLAIM PRIORITY ISSUES (.5); PARTICIPATE IN WEEKLY CALL WITH ASSIGNEE AND	1.90

## F E E S

Date	Attorney	Description	Hours
		NARDELLA TEAM (.5); REVIEW RESPONSE FROM PBGC AND DISCUSS SAME, INCLUDING PREPARATION OF MATERIALS FOR UPCOMING PBGC MEETING (.7)	
08/29/22	CC	WORK ON MOTION FOR SUMMARY JUDGMENT (FORESTERS ADV.)	1.00
08/29/22	CC	ATTEND TEAM STATUS CALL.	0.60
08/29/22	CC	FINALIZE LETTERS TO BEAZLEY INSURANCE RE NOTICE OF LAWSUITS FILED AGAINST ASSIGNOR (MUHLBERGER, CEYHAN AND LAPTALO; EMAIL AND SERVE SAME.	0.60
08/29/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CLAIMS ISSUES, UPCOMING HEARINGS, LEASE REJECTION, PBGC, FORESTERS, AND OTHER CASE MATTERS (1.2); CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH ESI TEAM REGARDING FORESTERS REVIEW PROJECT (.4); REVIEW AND REVISE INSURANCE NOTICE LETTERS AND SEND OUT, AND COMMUNICATIONS WITH TEAM REGARDING SAME (.5); COMMUNICATIONS WITH PBGC REGARDING DISCOVERY REQUESTS (.6).	2.70
08/29/22	JGT	REVIEWING HUNDREDS OF DOCUMENTS IN THE FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE AND CALL WITH THE LITIGATION TEAM RE: QUALITY CONTROL OF RESPONSIVE DOCUMENTS.	2.50
08/29/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR RESPONSIVENESS, ISSUE, PRIVILEGE, AND CONFIDENTIALITY FOR PRODUCTION.	1.00
08/29/22	SCJ	REVIEW AND CODE 400 OF FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	4.30
08/29/22	SCJ	CLEAN UP AND QC OF 200 FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	2.50
08/30/22	IMH	REVIEW MATERIALS AND PREPARE FOR CALL WITH PBGC'S COUNSEL TO DISCUSS CLAIMS	0.90
08/30/22	CC	WORK ON SUMMARY JUDGMENT MOTION (FORESTERS).	1.00
08/30/22	SJC	REVIEW OF FORESTERS DOCUMENTS AND CONFERENCE CALLS AND COMMUNICATIONS WITH ESI TEAM REGARDING SAME (2.2); LEGAL RESEARCH IN CONNECTION WITH FORESTERS DISPOSITIVE MOTION AND COMMUNICATIONS WITH TEAM REGARDING SAME (.8); COMMUNICATIONS WITH COUNSEL FOR INSURER REGARDING POST-PETITION LITIGATION FILED AGAINST ASSIGNOR (.3);	4.10

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>	
		COMMUNICATIONS WITH ASSIGNEE AND OWNER OF RIVER SHIP ENTITIES REGARDING ACCOUNTING DATA (.6); REVIEW TX DOCKETS AND COMMUNICATIONS REGARDING SAME (.2).		
08/30/22	JGT	WORK ON QUALITY CONTROL AND CONSISTENCY OF HUNDREDS OF FORESTER DOCUMENTS.	2.10	
08/30/22	JGT	CREATE CODING FORMS, SEARCHES AND TAGGING PRODUCTION SET DOCUMENTS AND THEN SPEAK WITH THE LITIGATION TO PROVIDE GUIDANCE ON THE SECOND LEVEL PRODUCTION QC PROCESS.	0.80	N/C
08/30/22	SCJ	CLEAN UP REVIEW OF 300 OF FORESTER DOCUMENTS FOR PRIVILEGE.	4.60	
08/31/22	IMH	FURTHER ANALYSIS OF ISSUES RAISED BY 8/29 EMAIL FROM M BAIRD OF THE PBGC	1.20	
08/31/22	CC	CONDUCT 2ND LEVEL REVIEW OF DOCUMENTS RESPONSIVE TO FORESTERS FIRST REQUEST FOR PRODUCTION OF DOCUMENTS.	1.00	
08/31/22	CC	WORK ON MOTION FOR SUMMARY JUDGMENT (FORESTERS ADV.)	1.20	
08/31/22	SJC	CONTINUE REVIEW OF FORESTERS DOCUMENTS AND COMMUNICATIONS WITH TEAM REGARDING SAME AND RELATED MATTERS (1.7); PREPARE FOR AND ATTEND CONFERENCE CALL WITH COUNSEL FOR BEAZLEY INSURANCE REGARDING PENDING MATTERS AGAINST ASSIGNOR AND RELATED MATTERS AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.2); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND OTHERS REGARDING REQUESTS FOR INFORMATION FROM FOREIGN FIDUCIARIES AND AFFILIATE REPRESENTATIVES (.6); COMMUNICATIONS REGARDING FEE APPLICATION HEARINGS (.1).	3.60	
08/31/22	JGT	REVIEW DOCUMENTS IN THE FORESTER VIA QUALITY CONTROL SEARCHES OF RESPONSIVE DOCUMENTS.	2.50	
08/31/22	JGT	CREATING ADDITIONAL SEARCHES FOR SECOND LEVEL REVIEW AND QUALITY CONTROL OF THE PRODUCTION SET AND MEETING WITH THE LITIGATION TEAM TO PROVIDE GUIDANCE ON THE SECOND LEVEL PROCESSES.	1.10	N/C
08/31/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR PRIVILEGE CLEAN UP.	1.00	
08/31/22	SCJ	REVIEW AND CLEAN UP OF FORESTER DOCUMENTS FOR PRIVILEGE.	7.80	

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		<b>Total Hours:</b>	<b>468.70</b>
		<b>Sub-Total Fees:</b>	<b>144,512.50</b>
		<b>Less: Discount</b>	<b>(19,851.75)</b>
		<b>Total Fees:</b>	<b>124,660.75</b>

**F E E S U M M A R Y**

<b>Attorney</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Samuel J. Capuano	78.10	525.00	41,002.50
Christa K. Chanpak (NO CHARGE)	0.50	425.00	0.00
Michael A. Clinch	11.20	395.00	4,424.00
Carmen Cruz	40.10	265.00	10,626.50
Janette Diaz (NO CHARGE)	1.50	265.00	0.00
Deborah Fanich (NO CHARGE)	0.80	265.00	0.00
Jeffrey L. Hajny (NO CHARGE)	2.50	265.00	0.00
Ilyse M. Homer	35.40	595.00	21,063.00
Myrna E. Roure (NO CHARGE)	1.00	300.00	0.00
Paul S. Singerman	1.60	765.00	1,224.00
Jessie G. Torres (NO CHARGE)	1.90	360.00	0.00
E-Discovery/Document Review Team (BEFORE 30% DISCOUNT)	294.10	225.00	66,172.50
	<b>Total</b>	<b>468.70</b>	<b>\$144,512.50</b>

**EXPENSES**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
07/05/22	VENDOR: OUELLETTE & MAULDIN COURT REPORTERS, INC; INVOICE#: 972648; DATE: 7/5/2022 - 30806.0001 HEARING - JUDGE ALAN FINE, ATTENDANCE OF REPORTER	125.00
07/13/22	VENDOR: OUELLETTE & MAULDIN COURT REPORTERS, INC; INVOICE#: 972676; DATE: 7/13/2022 - 30806.0001 HEARING - JUDGE ALAN FINE, ATTENDANCE OF REPORTER	125.00
	CONFERENCE CALL CHARGES	295.59
	E-DISCOVERY DATA STORAGE FEE (\$12 PER GB)	2,928.00

**EXPENSES**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
	PACER CHARGE	1.00
	REPRODUCTION	23.10
	WESTLAW CHARGES	92.10
<b>Total Expenses</b>		<b>\$3,589.79</b>

<b>CURRENT BALANCE DUE</b>	<b>\$128,250.54</b>
PRIOR BALANCE	553,404.21
LESS PAYMENTS:	-0
PRIOR BALANCE DUE	<u>553,404.21</u>
PLUS CURRENT BALANCE:	128,250.54
<b>TOTAL NOW DUE:</b>	<b><u>681,654.75</u></b>

**PAST DUE BALANCE - LIST OF UNPAID INVOICE(S)**

<b>INVOICE NUMBER</b>	<b>INVOICE DATE</b>	<b>TOTAL</b>	<b>LAST PAYMENT DATE</b>	<b>LAST PAYMENT AMOUNT</b>	<b>BALANCE</b>
255069	07/15/22	465,935.55	NONE	0.00	465,935.55
255849	08/05/22	87,468.66	NONE	0.00	87,468.66
<b>Past Due Balance:</b>					<b>553,404.21</b>

 **BERGER SINGERMAN**

201 E. LAS OLAS BLVD. SUITE 1500  
FORT LAUDERDALE, FLORIDA 33301  
T: (954) 525-9900 F: (954) 523-2872  
[WWW.BERGERSINGERMAN.COM](http://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

January 12, 2023  
**Invoice: 261191**

**Client: 30806-0001**

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

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

Total Fees	216,015.50
Total Expenses	14,655.57
<b>Current Balance Due</b>	<b>230,671.07</b>
<b><i>Past Due Balance</i></b>	<b>128,250.54</b>
<b>Total Balance Due</b>	<b>\$358,921.61</b>

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/](http://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: January 12, 2023  
INVOICE NO. 261191

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

MATTER ID: 30806-0001

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**PROFESSIONAL LEGAL SERVICES RENDERED THROUGH: December 31, 2022**

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
09/01/22	IMH	PREPARE FOR AND PARTICIPATE IN HANDS ON CALL WITH PBGC TO DISCUSS CLAIMS AND POTENTIAL OBJECTIONS THERETO INCLUDING DISCUSSIONS REGARDING POTENTIAL SETTLEMENT (1.2); PREPARE FOLLOW UP MEMO REGARDING SAME (.3); ATTN TO ISSUES RELATED TO SECOND TIER REVIEW, PRIVILEGE AND PRODUCTION TO FORESTERS (.5)	2.00
09/01/22	CC	WORK ON MOTION FOR SUMMARY JUDGMENT IN FORESTERS ADVERSARY	0.50
09/01/22	CC	PREPARE, FINALIZE AND SERVE LETTERS TO CLAIMANTS RE CLAIM FOR REIMBURSEMENT OF CLAIMS MADE TO ALLIANZ.	0.60
09/01/22	CC	CONDUCT 2ND LEVEL REVIEW OF DOCUMENTS RESPONSIVE TO FORESTERS FIRST REQUEST FOR PRODUCTION OF DOCUMENTS	3.30
09/01/22	JLH	IMAGE ECLIPSE DOCUMENTS FOR REDACTION AND PRODUCTION	1.50
09/01/22	SJC	PREPARE FOR AND ATTEND SETTLEMENT CONFERENCE CALL WITH PBGC AND COMMUNICATIONS WITH TEAM REGARDING SAME, AND LEGAL RESEARCH IN CONNECTION WITH PBGC CLAIMS (3.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING TEXAS PROCEEDINGS, TRAVEL INSURANCE, CREDIT CARD CHARGEBACKS, SALES OF ASSETS, AND INQUIRIES REGARDING SAME (.9);	5.10



## F E E S

Date	Attorney	Description	Hours	
		COMMUNICATIONS WITH TEAM REGARDING HEARING ON FEE APPLICATIONS (.1); DRAFT LETTER TO CLAIMANTS REGARDING TRAVEL INSURANCE AND COMMUNICATIONS REGARDING SAME (.3); COMMUNICATIONS WITH TEAM AND COUNSEL FOR HERITAGE REGARDING CLOSING BINDER AND RESOLUTIONS (.2); COMMUNICATIONS WITH COUNSEL FOR INSURER (.1).		
09/01/22	JGT	CREATE SEVERAL SEARCHES FOR CONTINUED REVIEW AND QUALITY CONTROL OF HUNDREDS OF FORESTER DOCUMENTS AND PROVIDING GUIDANCE TO THE LITIGATION TEAM.	2.10	
09/01/22	MER	WORK ON REDACTIONS FOR THE PRODUCTION OF FORESTER DOCUMENTS.	1.00	
09/01/22	DAF	RECEIPT AND REVIEW OF BUYER'S AUTHORIZING CONSENT DELIVERED IN CONNECTION WITH RECENT SALE TRANSACTION; ATTENTION TO REVISING CLOSING SET TO INCLUDE SAME; PREPARE EMAIL TO C. CHAN-PAK ENCLOSING SAME FOR REVIEW AND COMMENT [.4 NO CHARGE].	0.00	N/C
09/01/22	SCJ	REVIEW AND CLEAN UP FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE	5.00	
09/02/22	IMH	DISCUSS RCCL LAWSUIT AGAINST BUYER AND POTENTIAL DISCOVERY EMANATING FROM SAME (.3); ATTN TO MONTHLY ADMINISTRATIVE MATTERS (.2)	0.50	
09/02/22	CC	CONDUCT 2ND LEVEL REVIEW OF DOCUMENTS RESPONSIVE TO FORESTERS FIRST REQUEST FOR PRODUCTION OF DOCUMENTS.	3.50	
09/02/22	SJC	CONTINUE REVIEWING DOCUMENTS FOR FORESTERS PRODUCTION AND COMMUNICATIONS WITH TEAM REGARDING SAME, AND BEGIN WORKING ON SUMMARY JUDGMENT MOTION (3.5); COMMUNICATIONS WITH TEAM REGARDING FEE APPLICATION ISSUES (.1); COMMUNICATIONS WITH TEAM REGARDING TRAVEL INSURANCE ISSUES (.1); COMMUNICATIONS WITH TEAM REGARDING PBGC ISSUES (.1); REVIEW COMPLAINT AND MOTION BY RCCL AGAINST NEW CRYSTAL ENTITY AND COMMUNICATIONS WITH ASSIGNEE TEAM REGARDING SAME (.7).	4.50	
09/02/22	JGT	REVIEW OF FORESTER DOCUMENTS IN QUALITY CONTROL SEARCHES AND PREPARE DOCUMENTS TO BE PART OF THE NEXT PRODUCTION.	2.50	
09/02/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR QC ANALYSIS.	4.00	

## F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	
09/02/22	SCJ	REVIEW AND CLEAN UP FORESTER DOCUMENTS FOR RELEVANCY AND PRIVILEGE.	2.50	N/C
09/06/22	IMH	FINALIZE OPEN ISSUES REGARDING FIRST TRAUNCHE OF PRODUCTION TO FORESTERS (.6); REVISE WEEKLY TASK LIST (.2); FOLLOW UP ANALYSIS REGARDING OPEN INQUIRIES AND ISSUES FOR PBGC (1.6); ATTN TO MONTHLY ADMINISTRATIVE AND BILLING MATTERS (.2)	2.60	
09/06/22	SJC	COMMUNICATIONS WITH COCOUNSEL, ASSIGNEE, AND TEAM REGARDING UPCOMING HEARINGS AND OTHER CASE MATTERS (1.3); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING FORESTERS DISCOVERY AND PRODUCTION (1.1); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH COUNSEL FOR CREDITOR, ASSIGNEE AND TEAM REGARDING FEE APPLICATIONS (.9); COMMUNICATIONS WITH COUNSEL FOR INSURER REGARDING UPCOMING HEARING (.1); COMMUNICATIONS WITH CREDITOR REGARDING CLAIMS ISSUES (.1);	3.50	
09/06/22	JGT	WORKING ON QUALITY CONTROL AND PRODUCTION QC, AS WELL AS CALLS WITH THE LITIGATION TEAM RE: PRODUCTION ISSUES.	2.20	
09/06/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR QC ON RESPONSIVENESS AND PRIVILEGE FOR PRODUCTION.	3.50	
09/07/22	IMH	CONTINUE WORK ON ON PRODUCTION TO G FREEDMAN AND STRATEGIZE REGARDING NEXT STEPS (.6); REVISE MEMO TO M HEALY REGARDING POTENTIAL SETTLEMENT WITH PBGC AND STRATEGIZE REGARDING SAME (.3); FOLLOW UP RESEARCH REGARDING PRIORITY STATUS AFFORDED PBGC CLAIMS IN BANKRUPTCY (1.2)	2.10	
09/07/22	CC	REVIEW DRAFT OF AUGUST INVOICE.	0.40	
09/07/22	CC	FINALIZE AND UPLOAD ORDER GRANTING MOTION FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES TO PARRISWHITTAKER.	0.20	
09/07/22	CMG	PREPARE ELECTRONIC DOCUMENT PRODUCTION; CREATION OF SHAREFILE LINK FOR DATA TRANSMITTAL	1.10	
09/07/22	SJC	PREPARE FOR AND ATTEND FEE APPLICATION FOR BAHAMAS COUNSEL AND COMMUNICATIONS WITH TEAM, ASSIGNEE, AND SPECIAL COUNSEL REGARDING SAME, AND FINALIZE AND SUBMIT ORDER ON SAME (1.6); FINALIZE FORESTERS	6.90	

## F E E S

Date	Attorney	Description	Hours
		PRODUCTION AND SERVE SAME, AND MEETINGS, CONFERENCE CALLS AND EMAILS WITH TEAM REGARDING SAME, LEGAL RESEARCH IN CONNECTION WITH SAME, AND BEGIN REVIEWING AND ANALYZING SECOND REQUEST FOR PRODUCTION (3.1); DRAFT AND SEND MEMO TO ASSIGNEE REGARDING PBGC CLAIMS, CONTINUE LEGAL RESEARCH IN CONNECTION WITH SAME, AND MEETINGS AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.5); CONFERENCE CALLS WITH ASSIGNEE REGARDING CLAIMS ISSUES, CREDIT CARD ISSUES, PBGC ISSUES, FORESTERS LITIGATION, AND OTHER CASE MATTERS (.7);	
09/07/22	JGT	WORKING ON QUALITY CONTROL AND PRODUCTION QC, AS WELL AS CALLS WITH THE LITIGATION TEAM RE: PRODUCTION ISSUES.	3.50
09/07/22	MER	REVIEW HUNDREDS OF FORESTER DOCUMENTS FOR QC ON RESPONSIVENESS AND PRIVILEGE FOR PRODUCTION. PREPARE SEARCHES AND REVIEW PRODUCTION TAGGING, TO SET FOR PRODUCTION AND ASSISTING WITH THE REDACTION, PRIV AND RESPONSIVE TAGS.	4.00
09/08/22	IMH	REVIEW AND REVISE CASE MANAGEMENT REPORT IN FORESTERS (.2); RESEARCH AND ANALYSIS IN SUPPORT OF SUMMARY JUDGMENT AGAINST FORESTERS (1.8); TEAM DISCUSSIONS AND ANALYSIS REGARDING LIMITATION OF PRIORITY CLAIMS (.8)	2.80
09/08/22	CC	PREPARE E-BINDER FOR HEARING ON MOTIONS FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF ASSIGNEE AND HIS PROFESSIONALS SCHEDULED FOR 9.22.2022.	1.20
09/08/22	CC	WORK ON AUGUST INVOICE RE REDUCTION IN AMOUNTS SPENT ON DOCUMENT REVIEW; CONFER WITH M. MORALES AND S. CAPUANO RE SAME.	0.80
09/08/22	CMG	ELECTRONIC BATES LABELING OF PRIVILEGED DOCUMENTS SO THAT REVIEW TEAM MAY GENERATE PRIVILEGE LOG	0.30
09/08/22	SJC	PREPARE FOR AND ATTEND CONFERENCE CALL WITH COUNSEL FOR INSURER REGARDING PENDING LITIGATION AGAINST ASSIGNOR AND HEARING ON MOTION FOR CLARIFICATION OF STAY, AND COMMUNICATIONS WITH TEAM REGARDING SAME HEARING (1.0); PREPARE FOR HEARINGS ON FEE APPLICATIONS AND COMMUNICATIONS WITH TEAM REGARDING SAME, AND WORK ON SAME (1.0); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING PBGC	2.80

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		STRATEGY, CLAIMS ISSUES, AND OTHER MATTERS (.5); REVIEW CLAIMS DATA IN CASE (.3).	
09/08/22	JGT	EXPORT DATA FROM THE REVIEW PLATFORM TO SETUP PROCESS FOR CREATION OF THE PRIVILEGE LOG AND WORKING ON THE REDACTION LOG ENTRIES.	2.10
09/08/22	MER	REVISE AND STREAMLINE PRIVILEGE LOG AND SET UP PROPOSED DESCRIPTIONS IN THE FORESTER MATTER.	0.50
09/09/22	IMH	CONTINUE REVIEW AND ANALYSIS OF BANKRUPTCY DECISIONS INVOLVING PRIORITY CLAIMS OF PBGC IN RELATION TO POTENTIAL SETTLEMENT OFFER (1.5); REVISE SETTLEMENT PROPOSAL TO PBGC (.3); REVIEW FORESTERS PRIVILEGE LOG AND ATTN TO OPEN ISSUES RELATED TO FINALIZING SAME (.8)	2.60
09/09/22	SJC	REVISE MEMO TO PBGC AND CONFERENCE CALL AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (1.5); COMMUNICATIONS WITH ASSIGNEE'S TEAM REGARDING FORESTERS 2ND REQUEST FOR PRODUCTION AND REVIEW CERTAIN RELATED DOCUMENTS, AND WORK ON PRIVILEGE LOG IN CONNECTION WITH 1ST REQUEST FOR PRODUCTION AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS REGARDING SAME (1.3); COMMUNICATIONS WITH ASSIGNEE REGARDING D&O MATTERS (.2); COMMUNICATIONS REGARDING HEARING ON MOTION FOR CLARIFICATION OF STAY (.1); CONFERENCE CALL WITH CREDITOR REGARDING CASE STATUS (.2).	3.30
09/09/22	JGT	REVIEW FINAL PRIVILEGE AND REDACTION LOG AND SHARING EXPORTED VERSION WITH THE LITIGATION TEAM.	1.10
09/09/22	MER	REVIEW AND PREPARE PRIVILEGE DESCRIPTIONS FOR PRIVILEGE LOG IN THE FORESTER MATTER.	2.00
09/12/22	IMH	PREPARE FOR HANDS ON TEAM CALL INCLUDING REVISIONS TO TASK LIST (.3); PARTICIPATE IN SAME AND ATTN TO FOLLOW UP ISSUES (.8); FOLLOW UP WITH M HEALY REGARDING PBGC SETTLEMENT PROPOSAL (.2); REVIEW DOCKET REGARDING UPDATES TO ROYAL CARIBBEAN LAWSUIT (.2); STRATEGIZE REGARDING FORRESTER'S PRIVILEGE LOG (.2)	1.70
09/12/22	CC	ATTEND WEEKLY TEAM STATUS CALL.	0.50
09/12/22	CC	UPDATE TASK LIST IN PREPARATION FOR WEEKLY	0.30

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		STATUS CALL.	
09/12/22	CC	PREPARE CHART OF BREAKDOWN OF EXPENSES OF BSLLP IN MOTION FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF BSLLP.	0.30
09/12/22	CC	CONFER WITH OUELLETTE & MAULDING COURT REPORTERS RE ATTENDANCE AT VARIOUS UPCOMING HEARINGS; EMAIL CORRESPONDING NOTICES OF HEARING.	0.20
09/12/22	SJC	PREPARE FOR AND ATTEND HEARING ON MOTION FOR CLARIFICATION OF STAY AND REVIEW ORDER ON SAME (1.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING PBGC, CLAIMS, RELATED LITIGATION, LEASE REJECTION, CLAIMS AGAINST LANDLORD, DUTCH TRUSTEE DISCOVERY, FORESTERS, FEE APPLICATIONS, AND OTHER CASE MATTERS (1.8); REVIEW ORDER ON BAHAMAS FEE APP AND SEND TO SPECIAL COUNSEL (.1)	3.40
09/13/22	IMH	RESEARCH IN SUPPORT OF MOTION FOR PROTECTION OR TO ABATE REGARDING ADDITIONAL DOCUMENT REQUEST FROM FORESTERS (.9); PREPARE FOR UPCOMING STATUS HEARING (.3); REVIEW COST SUBMISSIONS AND PREPARE FOR FEE APP HEARING FOR ASSIGNEE AND HIS PROFESSIONALS (.3)	1.50
09/13/22	CC	WORK ON OBTAINING FACTS ON SOFT COSTS IN PREPARATION FOR FEE APPLICATION HEARING.	0.30
09/13/22	CC	WORK ON CALCULATING AMOUNTS SPENT ON FORESTERS SUPPLEMENTAL PROCEEDING AND LITIGATION.	1.20
09/13/22	SJC	COMMUNICATIONS WITH ASSIGNEE AND COUNSEL FOR SALESFORCE REGARDING DATA ISSUES (.3); COMMUNICATIONS WITH ASSIGNEE AND DUTCH TRUSTEE REGARDING DISCOVERY AND RELATED MATTERS (.3).	0.60
09/14/22	IMH	PREPARE FOR NEXT CASE MANAGEMENT CONFERENCE (.2); STRATEGIZE REGARDING NEXT STEPS FOR BEAZLEY COVERAGE LETTERS (.2); FOLLOW UP WITH ASSIGNEE REGARDING UPDATES TO COMPANY WEBSITE (.3)	0.70
09/14/22	CC	PREPARE ORDER CANCELLING CASE MANAGEMENT CONFERENCE SCHEDULED FOR SEPTEMBER 21, 2022.	0.30
09/14/22	CC	CONTINUE CALCULATING AMOUNTS SPENT ON FORESTERS SUPPLEMENTAL PROCEEDING AND LITIGATION.	1.00

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
09/14/22	CC	REVIEW DOCKETED DEADLINES AND UPDATE TASK LIST TO INCLUDE FORESTERS SUPPLEMENTAL PROCEEDING DEADLINES.	0.20
09/14/22	SJC	DRAFT FORESTERS MOTION FOR SUMMARY JUDGMENT AND LEGAL AND FACTUAL RESEARCH IN CONNECTION WITH SAME, AND CIRCULATE SAME TO TEAM FOR REVIEW (6.0); COMMUNICATIONS WITH ASSIGNEE AND PBGC REGARDING PENSION ISSUES (.2); COMMUNICATIONS WITH TEAM REGARDING CREDITOR INQUIRIES (.1); REVIEW INSURANCE CORRESPONDENCE AND COMMUNICATIONS WITH TEAM REGARDING SAME (.5).	6.80
09/15/22	IMH	REVISE SUMMARY JUDGMENT MOTION AGAINST FORESTERS INCLUDING ANALYSIS OF EQUITABLE ARGUMENT ANALOGIZING TO PREFERENCE RECIPIENTS IN BANKRUPTCY AND STRATEGIZE REGARDING SAME (1.4); RESEARCH IN SUPPORT OF MOTION FOR PROTECTIVE ORDER REGARDING SECOND ROUND OF FORESTERS DISCOVERY (.4);	1.80
09/15/22	CC	FINALIZE AND UPLOAD ODER CANCELLING CASE MANAGEMENT CONFERENCE SCHEDULED FOR SEPTEMBER 21, 2022.	0.30
09/15/22	CC	PREPARE MOTION FOR PROTECTIVE ORDER OR IN THE ALTERNATIVE TO ABATE DISCOVERY (1.0); CONFER WITH I. HOMER RE SAME (.20)	1.20
09/15/22	CC	UPDATE TASK LIST.	0.20
09/15/22	SJC	CONTINUE REVISING FORESTERS SJ MOTION AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH I HOMER REGARDING SAME (1.5); REVIEW AND REVISE AMENDED JOINT CASE MANAGEMENT REPORT AND PRETRIAL ORDER AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING SAME, PRIVILEGE LOG, SECOND REQUEST FOR PRODUCTION, AND OTHER DISCOVERY ISSUES (1.5); REVIEW ORDER CANCELLING INTERIM CASE MANAGEMENT CONFERENCE (.1); CONFERENCE CALL WITH ASSIGNEE REGARDING PBGC, FORESTERS, CLAIMS ISSUE, AND OTHER CASE MATTERS (.5); FINALIZE AND SEND SETTLEMENT OFFER TO PBGC AND COMMUNICATIONS WITH TEAM REGARDING SAME (.7)	4.30
09/15/22	JGT	WORKING ON DISCOVERY PRODUCTION QUESTION AT THE LITIGATION TEAM'S REQUEST, AND ANALYZING HUNDREDS OF DOCUMENTS VIA TARGETED SEARCHES.	0.80

## F E E S

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>
09/16/22	IMH	ATTENTION TO EMAIL FROM M BAIRD REGARDING POTENTIAL SETTLEMENT WITH PBGC AND CONDUCT FOLLOW UP RESEARCH AND ANALYSIS OF BANKRUPTCY CASES AS TO PRIORITY STATUS	1.60
09/16/22	CC	WORK ON MOTION FOR PROTECTIVE ORDER OR IN THE ALTERNATIVE TO ABATE DISCOVERY.	1.80
09/16/22	CC	ATTEND CONFERENCE CALL WITH S. CAPUANO AND S. WILLIAMSON RE COMPONENTS OF E-DISCOVERY CHARGES.	0.30
09/16/22	SJC	COMMUNICATIONS WITH TEAM AND PBGC REGARDING SETTLEMENT OFFER AND RELATED MATTERS (.5); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING FEE APPLICATION HEARING PREPARATION (.5); WORK ON MOTION FOR SUMMARY JUDGMENT AND DISCOVERY MOTION IN FORESTERS CASE AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING VARIOUS CASE ISSUES (1.8).	2.80
09/16/22	JGT	ATTEND CALL AND MEETING WITH LITIGATION TEAM RE: A BREAKDOWN OF THE DISCOVERY COSTS.	0.20
09/19/22	IMH	REVIEW ADDITIONAL MATERIALS RELATED TO 9/21 HEARINGS AND REVISE PREPARATION FOR SALE (.8); PREPARE AND REVISE AGENDA FOR WEEKLY HANDS ON CALL WITH ASSIGNEE (.3); STRATEGIZE REGARDING OUTSTANDING DOCUMENT REQUESTS INCLUDING OPEN ISSUES RELATED TO FORESTERS DISPUTE (.3); RESEARCH IN SUPPORT OF MOTION FOR PROTECTION AS TO FORESTERS SECOND REQUEST FOR PRODUCTION (.4)	1.80
09/19/22	CC	UPDATE TASK LIST	0.30
09/19/22	SJC	CONTINUE DRAFTING FORESTERS DISCOVERY MOTION AND SUMMARY JUDGMENT MOTION, SEND SAME TO ASSIGNEE FOR REVIEW, AND CONFERENCE CALLS, MEETINGS, AND EMAILS WITH ASSIGNEE AND TEAM REGARDING SAME AND RELATED MATTERS (2.5); COMMUNICATIONS WITH CLIENT AND TEAM REGARDING PBGC, FORESTERS MATTERS, FEE APPLICATION HEARINGS, AND OTHER MATTERS (1.0).	3.50
09/20/22	IMH	REVIEW DOCUMENTS RELATED TO 9/22 HEARINGS AND PREPARE FOR SAME	1.00
09/20/22	CC	UPDATE E-BINDER FOR HEARINGS ON MOTION FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF ASSIGNEE AND HIS PROFESSIONALS.	0.40
09/20/22	SJC	PREPARE FOR HEARING ON FEE APPLICATIONS FOR ASSIGNEE AND ALL PROFESSIONALS	1.00

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
09/20/22	JGT	ASSIST THE LITIGATION WITH DATABASE QUESTIONS RE: A PRODUCTION SUMMARY.	0.20
09/21/22	IMH	REVIEW COURT FILINGS AND PREPARE FOR TOMORROW'S HEARINGS INCLUDING TEAM DISCUSSIONS AND FOLLOW UP WITH ASSIGNEE (1.5)	1.50
09/21/22	CC	FINALIZE AND E-FILE MOTION FOR PROTECTIVE ORDER (.40); REVIEW AVAILABLE DATES IN OCTOBER FOR HEARING (.30); CORRESPOND WITH S. CAPUANO RE SAME (.10).	0.80
09/21/22	SJC	FINALIZE AND FILE MOTION FOR PROTECTIVE ORDER AND TO STAY DISCOVERY IN CONNECTION WITH FORESTERS 2ND RFP AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS, ASSIGNEE AND TEAM REGARDING SAME (1.4); COMMUNICATIONS WITH ASSIGNEE REGARDING INSURANCE DEMAND AND REVIEW SAME (.5); PREPARE FOR HEARING ON 7 FEE APPLICATIONS AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE, COCOUNSEL, AND TEAM REGARDING SAME (2.5).	4.40
09/22/22	IMH	PREPARE FOR AND PARTICIPATE IN TODAY'S COURT HEARING (1); FOLLOW UP CALL WITH M HEALY (.2); RESEARCH AND PREPARE MATERIALS TO SUBMIT IN CONNECTION WITH FEE APP ORDERS (.8); STRATEGIZE REGARDING DOCUMENTS RELEVANT TO D&O DISPUTE AND REVIEW MATERIALS REGARDING SAME (.6);	2.60
09/22/22	CC	PREPARE ORDERS GRANTING MOTIONS FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES FOR EACH OF THE ASSIGNEE AND HIS PROFESSIONALS.	1.60
09/22/22	CC	EMAIL TO ASSIGNEE'S PROFESSIONALS RE REQUEST FOR WIRE TRANSFER INSTRUCTIONS FOR PAYMENT OF FEES AND EXPENSES.	0.60
09/22/22	CC	CONDUCT RESEARCH RE PREVIOUS ORDERS APPROVING PAYMENT OF FEES OF 10% OF RECEIPTS TO ASSIGNEES.	0.30
09/22/22	CC	UPLOAD PROPOSED ORDERS GRANTING MOTIONS FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF ASSIGNEE AND HIS PROFESSIONALS.	1.00
09/22/22	SJC	PREPARE FOR AND ATTEND HEARING ON FEE APPLICATIONS FOR ASSIGNEE AND SIX COUNSEL, CONFERENCE CALLS, MEETINGS, AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, AND COCOUNSEL REGARDING SAME, REVISE AND FINALIZE AND SUBMIT ORDERS APPROVING ALL FEE	6.00



## F E E S

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		APPLICATIONS ALONG WITH SUPPORTING DOCUMENTATION REQUESTED BY JUDGE FINE, AND COMMUNICATIONS WITH CHAMBERS REGARDING SAME	
09/23/22	IMH	ADDITIONAL RESEARCH AND ANALYSIS IN SUPPORT OF SUMMARY JUDGMENT IN FORESTERS LITIGATION (1.1); REVISE MOTION IN ACCORDANCE WITH SAME (.2); REVIEW AND REVISE AFFIDAVIT IN SUPPORT OF SAME (.2)	1.60
09/23/22	CC	WORK ON ASSEMBLING EXHIBITS TO MOTION FOR SUMMARY JUDGMENT.	1.50
09/23/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF HEARING ON ASSIGNEE'S MOTION FOR PROTECTIVE ORDER AND STAY FOR DISCOVERY (.40); SERVE SAME (.20); UPLOAD DOCUMENTS TO COURTMAP FOR HEARING.	0.80
09/23/22	CC	CORRESPOND WITH ASSIGNEE'S PROFESSIONALS RE ORDER GRANTING FEE APPLICATION AND WIRE INSTRUCTIONS (.40); FOLLOW UP RE SAME (.20); CORRESPOND WITH L. WEBER OF MOECKER RE SAME (.20).	0.80
09/23/22	JLH	EXPORT PRODUCED DOCUMENTS FROM ECLIPSE FOR PARALEGAL REVIEW	0.30
09/23/22	SJC	REVIEW ORDERS GRANTING FEE APPLICATIONS AND COMMUNICATIONS WITH COCOUNSEL AND TEAM REGARDING SAME, PAYMENT, AND RELATED MATTERS (.7); COMMUNICATIONS WITH CREDITOR COUNSEL REGARDING CASE STATUS (.1); CONTINUE WORKING ON FORESTERS MOTION FOR SUMMARY JUDGMENT, AFFIDAVIT, AND EXHIBITS AND COMMUNICATIONS WITH TEAM REGARDING SAME, AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING HEARING ON MOTION FOR PROTECTIVE ORDER AND TO STAY DISCOVERY, FINALIZE NOTICE OF HEARING AND FILE SAME (2.6).	3.40
09/23/22	JGT	ASSIST THE LITIGATION TEAM WITH EXPORTING NEEDED DATA.	0.20
09/26/22	IMH	COMMUNICATE WITH ASSIGNEE REGARDING OPEN ISSUES FOLLOWING LAST WEEK'S HEARING (.2); REVISE WORKING TASK LIST (.2); EMAILS REGARDING OPEN ISSUES RELATED TO FILING OF SUMMARY JUDGEMENT MOTION IN FORESTERS AND STRATEGIZE REGARDING SAME (.3)	0.70
09/26/22	CC	WORK ON REDACTING EXHIBITS TO MOTION FOR SUMMARY JUDGMENT (FORESTERS ADV.)	1.20

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>	
09/27/22	IMH	REVIEW DOCUMENTS AND UPDATE ANALYSIS AND MOTION FOR SUMMARY JUDGMENT AGAINST FORESTERS (2); PREPARE MATERIALS FOR HEARING ON SAME (1); FOLLOW UP REGARDING NEXT STEPS RELATED TO PBGC CLAIMS (.3)	3.30	
09/27/22	CC	WORK ON EXHIBITS TO MOTION FOR SUMMARY JUDGMENT (FORESTERS ADV.).	0.30	
09/27/22	SJC	WORK ON EXHIBITS TO SUMMARY JUDGMENT MOTION WITH FORESTERS AND COMMUNICATIONS WITH TEAM REGARDING SAME (.7); REVIEW DEMAND ON INSURER (.5); COMMUNICATIONS WITH TEAM REGARDING PBGC (.1); COMMUNICATIONS WITH CREDITORS REGARDING CASE STATUS (.3).	1.60	
09/28/22	IMH	TEAM DISCUSSIONS REGARDING PREPARATION OF RECAP MEMO REGARDING OPEN DISCOVERY ISSUES RELATED TO FORESTERS AND REVIEW SAME (.6); RESEARCH AND ANALYSIS IN SUPPORT OF FINALIZING FORESTERS SUMMARY JUDGMENT MOTION (1)	1.60	
09/28/22	CC	FINALIZE AND E-FILE ASSIGNEE'S MOTION FOR SUMMARY JUDGMENT (FORESTERS ADV.) (.50); FINALIZE EXHIBITS (.30).	0.80	
09/28/22	CC	ARRANGE FOR ELECTRONIC NOTARIZATION OF AFFIDAVIT OF MARK HEALY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; CORRESPOND WITH M. DAVILA AND M. HEALY RE SAME.	0.40	
09/28/22	CC	CORRESPOND WITH CBL RE SERVICE OF ASSIGNEE'S MOTION FOR SUMMARY JUDGMENT; ASSEMBLE PARTS AND EMAIL SERVICE OF SAME.	0.40	
09/28/22	MXD	REVIEW AND REMOTE ONLINE NOTARIZATION OF THE AFFIDAVIT OF MARK C. HEALY, SEVERAL EMAILS AND TC REGARDING SAME	0.50	N/C
09/28/22	SJC	FINALIZE AND FILE MOTION FOR SUMMARY JUDGMENT, AFFIDAVIT AND EXHIBITS IN FORESTERS MATTER AND CONFERENCE CALLS AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (1.8); CONFERENCE CALLS WITH ASSIGNEE AND TEAM REGARDING CLAIMS ISSUES, INSURANCE DEMAND, AND OTHER CASE MATTERS (.4).	2.20	
09/29/22	IMH	REVIEW DOCUMENTS AND TEAM DISCUSSION REGARDING CLAIMS POOL, INCLUDING STATUS AND AMOUNT	0.40	
09/29/22	SJC	COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CLAIMS ISSUES	0.10	

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
09/30/22	IMH	ANALYSIS OF LAW AND REVIEW OF MATERIALS REGARDING POTENTIAL USE OF PBGC AS GOLDEN CREDITOR PER TEAM DISCUSSION	1.60
09/30/22	SJC	COMMUNICATIONS WITH SPECIAL COUNSEL REGARDING FEE APPLICATIONS (.1); COMMUNICATIONS WITH TEAM REGARDING STATUS (.1).	0.20
10/03/22	PSS	ATTEND WEEKLY STATUS AND STRATEGY CALL	0.40
10/03/22	IMH	PREPARE FOR (.3) AND PARTICIPATE (.5) IN HANDS ON CALL WITH ASSIGNEE AND NARDELLA TEAM; REVISE WORKING TASK LIST (.2); REVISE MATERIALS RELATED TO PREPARATION FOR FORESTERS' SUMMARY JUDGMENT HEARING (1.2); RESEARCH AND REVIEW MATERIALS RELATED TO INSURANCE ISSUES (1.3)	3.50
10/03/22	CC	UPDATE TASK LIST.	0.30
10/03/22	CC	ATTEND TEAM STATUS CALL.	0.50
10/03/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM AND COCOUNSEL REGARDING BERMUDA PROCEEDINGS, CLAIMS REVIEW, FORESTERS MATTER, D&O DEMAND, AND OTHER CASE MATTERS	1.20
10/04/22	IMH	ATTENTION TO MONTHLY ADMINISTRATIVE MATTERS FOR ASSIGNEE'S PROFESSIONALS (.4); REVIEW DOCKET REGARDING FILINGS IN RESPONSE TO MOTION FOR PROTECTIVE ORDER IN FORESTERS (.1); DISCUSSION WITH ASSIGNEE REGARDING STATUS OF CLAIMS AND POTENTIAL OBJECTIONS (.3); DISCUSSION WITH CLERK'S OFFICE REGARDING HEARING ON MOTION FOR SUMMARY JUDGMENT (.2); TEAM EMAILS REGARDING SAME (.2); DISCUSSION WITH ASSIGNEE REGARDING UPCOMING CASE MANAGEMENT HEARINGS (.2)	1.40
10/04/22	CC	PREPARE ORDER CANCELLING INTERIM CASE MANAGEMENT CONFERENCE ON OCTOBER 19, 2022	0.20
10/04/22	CC	CONFER WITH D. DIAZ, JUDICIAL ASSISTANT TO JUDGE FINE RE SPECIAL SET HEARING FOR MOTION FOR SUMMARY JUDGMENT (.10); REVIEW COURTMAP CALENDAR FOR SPECIAL SET DATES IN NOVEMBER AND DECEMBER (.10); CORRESPOND WITH S. CAPUANO RE SAME (.10).	0.30
10/04/22	SJC	REVIEW NOTICE OF CANCELLATION OF INTERIM CASE MANAGEMENT CONFERENCE AND COMMUNICATIONS WITH TEAM REGARDING SAME (.2); MEETING, CONFERENCE CALLS AND EMAIL	1.60

## F E E S

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING SUMMARY JUDGMENT AND MOTION FOR PROTECTIVE ORDER AND RELATED MATTERS (.5); CONFERENCE CALL WITH J STEARNS AS COUNSEL FOR CREDITOR REGARDING CASE STATUS (.2); COMMUNICATIONS REGARDING D&O DEMAND (.2); RESEARCH IN CONNECTION WITH FL LANDLORD DISPUTE AND COMMUNICATIONS WITH COCOUNSEL AND ASSIGNEE REGARDING SAME (.5).	
10/05/22	IMH	DISCUSSIONS AND PREPARATION FOR HEARING ON MOTION FOR SUMMARY JUDGMENT REGARDING FORESTERS	1.00
10/05/22	SJC	COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND TEAM REGARDING SUMMARY JUDGMENT HEARINGS	0.20
10/06/22	CC	REVIEW REDACTED PRIVILEGED DOCUMENTS PRODUCED TO FORESTERS.	0.40
10/06/22	SJC	COMMUNICATIONS WITH TEAM AND COCOUNSEL REGARDING FORESTERS LITIGATION AND FL LANDLORD ISSUES	0.20
10/07/22	IMH	RESEARCH AND ANALYZE DOCUMENTS PRODUCED UNDER PRIVILEGED LEGEND TO FORESTERS, PERFORM SECOND TIER SEARCH (2.4); WORK ON RESPONSE TO S LUNDINGTON (.2); FOLLOW UP REGARDING POTENTIAL RESPONSE FROM PBGC TO SETTLEMENT PROPOSAL (.2)	2.80
10/07/22	CC	WORK ON REVIEW OF PRIVILEGED DOCUMENTS IN PRODUCTION TO FORESTERS.	2.30
10/07/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND COUNSEL FOR FORESTERS REGARDING DISCOVERY ISSUES AND LEGAL RESEARCH REGARDING PRIVILEGE ISSUES (1.0); COMMUNICATIONS WITH BERMUDA COUNSEL REGARDING BERMUDA PROCEEDINGS (.2)	1.20
10/07/22	JGT	DISCUSSION AND SUBSEQUENT CALL WITH THE LITIGATION TEAM RE: QUESTIONS RAISED BY OPPOSING COUNSEL ON PRIVILEGED DOCUMENTS.	0.30
10/09/22	IMH	REVISE CASE MANAGEMENT REPORT	0.60
10/10/22	IMH	PREPARE AND REVISE AGENDA FOR WEEKLY HANDS ON MEETING WITH ASSIGNEE AND PROFESSIONALS (.4); UPDATE ANALYSIS IN SUPPORT OF MOTION FOR PROTECTIVE ORDER AS TO FORESTERS SECOND REQUEST FOR PRODUCTION (.9); RESEARCH REGARDING MOTION FOR PROCEDURES FOR CONSUMER CLAIM OBJECTIONS (.4)	1.30

## F E E S

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
10/10/22	CC	UPLOAD DOCUMENTS INTO COURTMAP FOR HEARING ON NOVEMBER 29, 2022 ON MOTION FOR SUMMARY JUDGMENT (FORESTERS ADV.).	0.20
10/10/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CLAIMS ISSUES, BERMUDA PROCEEDINGS, AND FORESTERS ISSUES, AND REVIEW DOCUMENTS FILED IN BERMUDA PROCEEDINGS (1.1); REVIEW OF PRIVILEGE DOCUMENTS IN CONNECTION WITH 1ST RFP FROM FORESTERS, AND FINALIZE AND SUBMIT AMENDED CASE MANAGEMENT REPORT AND COMMUNICATIONS REGARDING SAME (1.0)	2.10
10/11/22	IMH	TEAM EMAILS AND DISCUSSIONS REGARDING ADDITIONAL FILINGS/MATERIALS NEEDED FOR FORESTERS SUMMARY JUDGMENT HEARING (.3); COMMUNICATE WITH CLERK'S OFFICE REGARDING SAME (.2)	0.50
10/11/22	SJC	CONTINUE WORKING ON REVIEW OF PRIVILEGE DOCUMENTS IN CONNECTION WITH 1ST RFP FROM FORESTERS, AND COMMUNICATIONS WITH CHAMBERS, TEAM, AND COUNSEL FOR FORESTERS REGARDING HEARING ON SUMMARY JUDGMENT AND REVIEW NOTICE OF HEARING (2.0); COMMUNICATIONS WITH COUNSEL IN BERMUDA REGARDING GENTING WINDING UP PROCEEDINGS (.2)	2.00
10/12/22	SJC	CONTINUE WORKING ON REVIEW OF PRIVILEGE DOCUMENTS IN CONNECTION WITH 1ST RFP FROM FORESTERS AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.1); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE REGARDING CLAIMS ISSUES, D&O DEMAND, BERMUDA ISSUES, CREDITOR INQUIRIES, CREDIT CARD RECEIVABLES, CLAIMS AGAINST LANDLORD, AND OTHER MATTERS (.8); COMMUNICATIONS WITH CHAMBERS AND TEAM REGARDING CANCELLATION OF INTERIM CASE MANAGEMENT CONFERENCE AND HEARING ON SUMMARY JUDGMENT IN FORESTERS MATTER (.2); COMMUNICATIONS WITH BERMUDA COUNSEL (.1).	2.20
10/13/22	IMH	TEAM DISCUSSIONS REGARDING PRODUCTION OF REVISED PRIVILEGE LOG IN FORESTERS (.3); REVIEW DOCUMENTS REGARDING SAME (.7)	1.00
10/13/22	CC	FINALIZE AND UPLOAD ORDER CANCELLING INTERIM CASE MANAGEMENT CONFERENCE SCHEDULED ON OCTOBER 19, 2022.	0.20
10/13/22	SJC	COMMUNICATIONS WITH COUNSEL FOR CREDITOR AND ASSIGNEE REGARDING CASE STATUS (.2);	0.40

## F E E S

Date	Attorney	Description	Hours
		COMMUNICATIONS WITH TEAM REGARDING FORESTERS PRIVILEGED DOCUMENT PROJECT (.2).	
10/14/22	IMH	REVIEW PRODUCED DOCUMENTS AND STRATEGIZE REGARDING ADDITIONAL FILINGS IN SUPPORT OF SUMMARY JUDGMENT AGAINST FORESTERS (.5); PREPARE SUBMISSION/STATUS UPDATE FOR CREDITORS (.5); REVISE ROLLING TEAM TASK LIST (.2); REVIEW COURT ORDER REGARDING UPCOMING CASE MANAGEMENT CONFERENCES AND TEAM DISCUSSIONS REGARDING SAME (.3)	1.50
10/14/22	CC	WORK ON CORRECTING DOCUMENTS REDACTIONS AND NON-PRODUCED PRIVILEGED DOCUMENTS PURSUANT TO FORESTERS REQUEST.	2.00
10/14/22	CC	CONFER WITH J. TORRES (VARIOUS) RE PRIVILEGE REVIEW AND CORRECTION.	0.30
10/14/22	SJC	COMMUNICATIONS WITH CREDITOR REGARDING CLAIM ASSIGNMENT (.2); COMMUNICATIONS WITH TEAM REGARDING FORESTERS PRIVILEGE DOCUMENT PROJECT (.2); REVIEW ORDERS CANCELLING CASE MANAGEMENT CONFERENCE AND SETTING FUTURE CASE MANAGEMENT CONFERENCES (.1); COMMUNICATIONS REGARDING HEARING ON MOTION FOR PROTECTIVE ORDER AND MOTION FOR SUMMARY JUDGMENT WITH FORESTERS (.1).	0.60
10/17/22	IMH	REVIEW FORESTERS RESPONSE TO MOTION FOR PROTECTIVE ORDER AND STRATEGIZE REGARDING REPLY (.3); REVIEW AND DISCUSS REDACTION COMPILATION FOR FURTHER SUBMISSION TO FORESTERS AND TEAM DISCUSSIONS REGARDING SAME (.9); REVISE TASK LIST FOR HANDS ON CALL WITH ASSIGNEE AND PROFESSIONALS (.3)	1.50
10/17/22	CC	UPDATE TASK LIST.	0.40
10/17/22	CC	WORK ON REVISIONS TO PRIVILEGED AND/OR REDACTED DOCUMENTS REQUESTED BY FORESTERS (IN ECLIPSE).	2.00
10/17/22	CC	ATTEND TEAM STATUS CALL.	0.50
10/17/22	SJC	REVIEW RESPONSE IN OPPOSITION TO MOTION FOR PROTECTIVE ORDER IN FORESTERS MATTER AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING DOCUMENT PRODUCTION, CONFIDENTIALITY, AND PRIVILEGE ISSUES, AND REVIEW CERTAIN DOCUMENTS (2.2); CONFERENCE	3.70

## F E E S

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>	
		CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CLAIMS ISSUES, FORESTERS MATTER, LANDLORD ISSUES, PENSION MATTERS, AND OTHER CASE MATTERS (1.2); COMMUNICATIONS WITH COUNSEL FOR CREDITOR AND ASSIGNEE REGARDING CLAIMS AND STATUS (.3).		
10/17/22	JGT	WORK WITH THE LITIGATION AND DISCOVERY TEAMS ON PRIVILEGE AND REDACTION SEARCHES AND UPDATING PRODUCTION DATA.	0.50	
10/18/22	IMH	STRATEGIZE WITH TEAM REGARDING FORM OF PROCEDURES MOTION AS IT RELATES TO CLAIMS (.3); ANALYSIS AND TEAM DISCUSSIONS IN SUPPORT OF REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER (.7); RESEARCH REGARDING ABC CASES IN CONTEXT OF LIMITING DISCOVERY WHEN SUMMARY JUDGMENT IS PENDING (.8); ATTN TO DEADLINES AND OPEN ITEMS ASSOCIATED WITH PRE-TRIAL CALENDAR ISSUED BY COURT IN FORESTERS (.2)	2.00	
10/18/22	CC	WORK WITH ESI TEAM RE PRODUCTION OF REQUESTED PRIVILEGED DOCUMENTS.	0.40	
10/18/22	CC	REVISE PRODUCTION OF CERTAIN PRIVILEGED DOCUMENTS REQUESTED BY FORESTERS (IN ECLIPSE).	1.50	
10/18/22	JLH	EXPORT DOCUMENTS FROM ECLIPSE FOR TRIAL PREP	0.30	
10/18/22	SJC	DRAFT REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER IN FORESTERS MATTER AND LEGAL RESEARCH IN CONNECTION WITH SAME, CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING SAME, AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING SUPPLEMENTAL DOCUMENT PRODUCTION, AND REVIEW ORDERS AND NOTICES ENTERED BY COURT IN CONNECTION WITH PRETRIAL MATTERS (3.2); COMMUNICATIONS WITH COUNSEL FOR BUYER OF ASSETS REGARDING CLOSING BINDER (.2)	3.40	
10/18/22	JGT	WORK WITH THE LITIGATION AND DISCOVERY TEAMS PRE-PRODUCTION SEARCHES, REDACTION PROCESSES AND PRODUCTION GUIDANCE FOR THE TEAM.	0.80	
10/18/22	MER	CREATE SEARCH AND VERIFY THE PRIVILEGED DOCUMENTS THAT WILL BE PRODUCED.	2.00	N/C
10/19/22	IMH	WORK ON FILING IN SUPPORT OF MOTION FOR PROTECTION AGAINST FORESTERS INCLUDING FOLLOW UP RESEARCH AND ANALYSIS (2); EMAILS	2.20	

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		WITH M HEALY AND TEAM REGARDING SAME (.2)	
10/19/22	CC	WORK ON MOTION TO APPROVE CLAIM OBJECTION PROCEDURES.	0.60
10/19/22	CC	WORK ON UNREDACTING DOCUMENTS PREVIOUSLY PRODUCED REDACTED (FORESTERS ADV.).	1.00
10/19/22	JLH	CREATE CRYSTAL PROD004 DOCUMENT PRODUCTION	1.30
10/19/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER IN FORESTERS MATTER AND REVIEW REVISED REPLY, AND COMMUNICATIONS REGARDING DISCOVERY MATTERS AND PRODUCE ADDITIONAL DISCOVERY TO FORESTERS (1.3); REVIEW LETTER FROM DUTCH JUDGE REGARDING FOREIGN INSOLVENCY TRUSTEE'S DISCOVERY REQUEST AND COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (.7); COMMUNICATIONS WITH BERMUDA COUNSEL REGARDING JOINT PROVISIONAL LIQUIDATORS (.1)	2.10
10/19/22	JGT	WORK WITH THE LITIGATION AND DISCOVERY TEAMS FINAL PRODUCTIONS RELATED TO REDACTION DOWNGRADES.	0.70
10/20/22	IMH	ANALYSIS IN SUPPORT OF RESPONSE TO DUTCH TRUSTEE FOR TURNOVER (.9); FOLLOW UP WITH ASSIGNEE REGARDING FILING IN SUPPORT OF MOTION FOR PROTECTIVE ORDER AGAINST FORESTERS (.2); REVIEW AND ANALYZE CASE LAW REGARDING SAME (.8); ATTENTION TO ISSUES REGARDING REDACTIONS NEEDED FOR ADDITIONAL POTENTIAL PRODUCTION (.5)	2.40
10/20/22	CC	PREPARE E-BINDER FOR HEARING ON MOTION FOR PROTECTIVE ORDER; PULL CASES.	1.00
10/20/22	SJC	COMMUNICATIONS WITH TEAM REGARDING HEARING ON MOTION FOR PROTECTIVE ORDER IN FORESTERS MATTER (.4); REVIEW CORRESPONDENCE FROM DUTCH TRUSTEE AND COMMUNICATIONS WITH ASSIGNEE'S TEAM AND TEAM REGARDING SAME AND CORRESPONDENCE FROM FOREIGN JUDGE (.5)	0.90
10/21/22	IMH	FINALIZE REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER AND PREPARE FOR NEXT WEEK'S HEARING ON SAME (.6); WORK ON TEAM TASK LIST AND MEMO FOR 10/24 CALL WITH ASSIGNEE (.3); REVIEW FORESTERS THIRD REQUEST FOR PRODUCTION AND TEAM DISCUSSIONS REGARDING	1.20



**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		SAME (.3)	
10/21/22	CC	FINALIZE AND E-FILE REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER AND STAY OF DISCOVERY (FORESTERS V HEALY).	0.40
10/21/22	CC	WORK ON MOTION TO APPROVE NOTICING PROCEDURES FOR CLAIM OBJECTIONS.	0.50
10/21/22	CC	UPDATE BINDER FOR HEARING ON ASSIGNEE'S MOTION FOR PROTECTIVE ORDER.	0.30
10/21/22	SJC	FINALIZE AND FILE REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER IN FORESTERS MATTER AND COMMUNICATIONS WITH TEAM REGARDING SAME AND HEARING (.6); COMMUNICATIONS WITH ASSIGNEE REGARDING D&O MATTERS AND OTHER CASE ISSUES (.3); COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING CORRESPONDENCE FROM DUTCH TRUSTEE AND FOREIGN JUDGE (.3);	1.20
10/23/22	SJC	COMMUNICATIONS WITH COUNSEL FOR CREDITOR	0.10
10/24/22	IMH	PREPARE FOR HANDS ON CALL WITH ASSIGNEE AND ATTENTION TO FOLLOW UP ITEMS FROM TASK LIST (.9); PARTICIPATE IN SAME (.8); REVIEW DOCUMENTS RELATED TO STRUCTURE FOR NOTICE IN CLAIMS PROCEDURES MOTION(.4); MEET WITH E DISCOVERY TEAM REGARDING ADDITIONAL DOCUMENT REQUEST FROM FORESTERS (.4); PREPARE MATERIALS IN SUPPORT OF UPCOMING SUMMARY JUDGEMENT HEARING (.4); REVIEW CORRESPONDENCE FROM CREDITOR REGARDING CLAIMS PROCEDURES AND FOLLOW UP REGARDING SAME (.2)	3.10
10/24/22	CC	ATTEND TEAM STATUS CALL.	0.80
10/24/22	CC	UPDATE E-BINDER FOR HEARING ON MOTION FOR PROTECTIVE ORDER AND FOR STAY OF DISCOVERY.	0.50
10/24/22	CC	UPDATE TASK LIST.	0.30
10/24/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, AND ASSIGNEE'S TEAM REGARDING FORESTERS MATTER AND DISCOVERY, DUTCH TRUSTEE AND JUDGE CORRESPONDENCE, LANDLORD AND RELATED ISSUES, PENSION ISSUES, BERMUDA ISSUES, AND OTHER CASE MATTERS (2.0); REVIEW DATA FROM ASSIGNEE (.6) COMMUNICATIONS WITH DUTCH JUDGE AND TRUSTEE (.1); COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING MEET AND CONFER, AND REVIEW THIRD REQUEST FOR PRODUCTION (.3). COMMUNICATIONS WITH PBGC REGARDING	3.10

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		SETTLEMENT (.1).	
10/25/22	IMH	ANALYZE FORESTERS' POWER POINT SUBMISSION IN SUPPORT OF OPPOSITION TO PROTECTIVE ORDER AND IN SUPPORT OF ADDITIONAL DISCOVERY REQUESTS (.6); TEAM DISCUSSIONS REGARDING RESPONSE TO SAME (.3); STRATEGIZE REGARDING TODAY'S MEET AND CONFER WITH S LUDINGTON (.4); REVIEW DOCUMENTS AND DISCUSS POTENTIAL SETTLEMENT FRAMEWORK (.4); TEAM DISCUSSIONS REGARDING POTENTIAL OBJECTION TO PBGC CLAIMS AND STRATEGIZE REGARDING SETTLEMENT (.3)	2.00
10/25/22	CC	REVIEW DOCUMENT DATABASE FOR RESERVE ACCOUNT RECONCILIATIONS AND CHARTERS AND INCENTIVE GROUP RESERVE REQUIREMENTS FOR CUSTOMERS WHO HELD RESERVE DEPOSITS IN CITIBANK ACCOUNT (FORESTERS ADV.).	1.50
10/25/22	CC	REVIEW PROOFS OF CLAIM FILED ON BEHALF OF CUSTOMERS FOR RETURN OF DEPOSITS.	0.60
10/25/22	CC	DOWNLOAD AND REVIEW ENTITY-LEVEL FINANCIALS RECEIVED FROM B. STRAKA.	0.40
10/25/22	SJC	PREPARE FOR AND ATTEND MEET AND CONFER WITH COUNSEL FOR FORESTERS REGARDING DISCOVERY, REVIEW PRESENTATION FOR HEARING ON MOTION FOR PROTECTIVE ORDER, MEETINGS AND TELEPHONE CALLS AND EMAILS WITH TEAM AND ASSIGNEE REGARDING SAME AND OTHER PRETRIAL MATTERS AND PREPARE FOR HEARING (4.2); PREPARE FOR AND ATTEND CONFERENCE CALL WITH COUNSEL FOR CREDITOR REGARDING CLAIMS ALLOWANCE ISSUES AND MEETING WITH TEAM REGARDING SAME (.5); COMMUNICATIONS WITH PBGC AND ASSIGNEE REGARDING CLAIMS (.2).	4.90
10/25/22	JGT	WORK WITHIN SEARCHES FOR TARGETED DOCUMENTS FOLLOWING MEETING WITH LITIGATION TEAM AND EXPORTING NATIVE DOCUMENTS FOR THE TEAM.	0.40
10/26/22	PSS	MEMOS FROM/TO S. CAPUANO RE DEBRIEF OF HEARING ON MOTION FOR PROTECTION	0.20
10/26/22	IMH	REVIEW CASE MANAGEMENT REPORT AND WORK ON NEXT SUBMISSION TO COURT (.4); DISCUSSIONS WITH M HEALY AND S CAPUANO REGARDING TODAY'S HEARING ON MOTION FOR PROTECTIVE ORDER (.6); REVISE ANALYSIS OF CONSUMER DEPOSIT ACCOUNTS (.5); STRATEGIZE REGARDING CUSTOMER DEPOSIT CLAIMS, INCLUDING POTENTIAL RESOLUTION OF CLAIMS SIMILARLY SITUATED WITH	2.20

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		FORESTERS (.4); REVIEW DOCUMENTS REGARDING SAME (.3)	
10/26/22	CC	DOCUMENT REVIEW CHART - ANALYSIS OF RESERVED ACCOUNT DEPOSITS AND RELATED PROOFS OF CLAIM	4.70
10/26/22	SJC	PREPARE FOR AND ATTEND HEARING ON MOTION FOR PROTECTIVE ORDER AND TO STAY DISCOVERY, AND MEETINGS, CONFERENCE CALLS, AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME AND STRATEGY, COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING MEET AND CONFER, AND MEETINGS WITH TEAM REGARDING DISCOVERY PROJECT (4.6); COMMUNICATIONS WITH PBGC REGARDING SETTLEMENT (.2)	4.80
10/27/22	PSS	INTEROFFICE CONFERENCE WITH I. HOMER RE STATUS AND ALLEGED ESCROWED/SEGREGATED DEPOSIT CLAIMS	0.20
10/27/22	IMH	STRATEGIZE WITH ASSIGNEE'S OFFICE REGARDING INFORMATION TO ADD TO ANALYSIS OF RESERVED ACCOUNTS AND PREPARE FOR NEXT MEET AND CONFER WITH FREEDMAN (1); RESEARCH IN SUPPORT OF SUPPLEMENT TO SUMMARY JUDGMENT (1)	2.00
10/27/22	CC	WORK ON CALCULATING DEADLINES IN CONNECTION WITH PRETRIAL/TRIAL DEADLINES ENTERED IN FORESTER ADV.	0.30
10/27/22	SJC	REVIEW AND REVISE PROPOSED ORDERS ON MOTION TO STAY DISCOVERY, FOR PROTECTIVE ORDER, AND TO CONTINUE HEARING ON SUMMARY JUDGMENT, AND READ TRANSCRIPT FROM HEARING, AND CIRCULATE REVISED ORDERS TO COUNSEL FOR FORESTERS, AND COMMUNICATIONS WITH TEAM REGARDING FORESTERS DISCOVERY (1.7); COMMUNICATIONS WITH TEAM REGARDING DUTCH JUDGE AND TRUSTEE ISSUES (.1)	1.80
10/28/22	IMH	ATTN TO ISSUES RELATED TO TODAY'S MEET AND CONFER WITH FORESTERS	0.90
10/28/22	SJC	PREPARE FOR AND ATTEND MEET AND CONFER ZOOM MEETING WITH COUNSEL FOR FORESTERS REGARDING DISCOVERY, TRIAL SCHEDULE, AND OTHER CASE MATTERS, AND REVISE AND COMMUNICATE REGARDING PROPOSED ORDERS ON MOTION FOR PROTECTIVE ORDER AND STAY OF DISCOVERY, AND COMMUNICATIONS WITH TEAM REGARDING SAME AND RELATED DISCOVERY MATTERS	2.20

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
10/31/22	IMH	TEAM DISCUSSIONS REGARDING REVISIONS TO WORKING TASK LIST (.2); ANALYSIS IN SUPPORT OF POTENTIAL DISTRIBUTION AND CLASSIFICATION OF PRIORITY CLAIMS (.5)	0.70
10/31/22	SJC	COMMUNICATIONS WITH TEAM REGARDING FORESTERS DISCOVERY MATTERS	0.40
11/01/22	IMH	REVIEW DOCUMENTS AND TEAM DISCUSSIONS TO DETERMINE ADDITIONAL DOCUMENTS TO PRODUCE TO FORESTERS (.7)	0.70
11/01/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CLAIMS ISSUES, FEE APPLICATIONS, LITIGATION, AND OTHER CASE MATTERS (1.1); RESEARCH IN CONNECTION WITH LITIGATION CLAIMS (.9)	2.00
11/01/22	JGT	WORKING ON KEYWORD LISTS AND SEARCHES AT THE DIRECTION OF THE LITIGATION TEAM AND MEETING TO DISCUSS POSSIBLE STRATEGIES.	0.70
11/02/22	PSS	MEMOS TO/FROM S. CAPUANO RE DEFAULT JUDGMENT (.2)	0.20
11/02/22	IMH	WORK ON ADDITIONAL PRODUCTION FOLLOWING FRIDAY'S MEET AND CONFER WITH FORESTERS (.9); TEAM EMAILS REGARDING OPEN FEE APPLICATIONS TO BE FILED AND NEXT SET OF REQUESTS FOR FEES BY ASSIGNEE AND COUNSEL (.3); STRATEGIZE REGARDING LAPALO DEFAULT AND RESEARCH RES JUDICATA IMPLICATIONS OF SAME (.4)	1.60
11/02/22	CC	REVIEW WIPS OF BSLLP FOR PERIOD OF SEPTEMBER - OCTOBER, 2022 IN PREPARATION FOR NEXT FEE APPLICATION.	1.20
11/02/22	SJC	DRAFT AND CIRCULATE DISCOVERY PROPOSAL TO FORESTERS, AND CORRESPONDENCE WITH FORESTERS, TEAM, AND ASSIGNEE REGARDING SAME, AND CONTINUE WORKING THRU FORESTERS SECOND AND THIRD REQUESTS OR PRODUCTION, AND CONFERENCES WITH ESI TEAM REGARDING SAME (3.2); COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING FEE APPLICATIONS (.5).	3.70
11/02/22	JGT	WORKING ON SEARCHES IN ECLIPSE AND PROVIDING GUIDANCE TO THE LITIGATION TEAM.	0.30
11/03/22	IMH	ANALYSIS IN SUPPORT OF RESPONSE TO DUTCH TRUSTEE REGARDING DOCUMENT REQUEST (.5); ATTN TO ISSUES REGARDING ADDITIONAL PRODUCTION BY FORESTERS AND ASSIGNEE'S PROPOSAL TO STREAMLINE SAME (.4); FOLLOW UP ANALYSIS REGARDING ACCOUNT CHART AS IT	1.20

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		RELATES TO CLAIMS AND ESCROW ISSUES (.3)	
11/03/22	CC	PREPARE AND FINALIZE LETTER TO THE HONORABLE SUPERVISORY JUDGE W.M. DE VRIES RE CRYSTAL RIVER CRUISES OPERATIONS COOPERATIEF.	0.30
11/03/22	CC	PREPARE MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY PHELPS DUNBAR.	0.40
11/03/22	CC	REVIEW INVOICE OF BSLLP FOR MONTH OF OCTOBER FOR FEE APPLICATION.	0.80
11/03/22	SJC	DRAFT RESPONSE TO DUTCH JUDGE DEMAND AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME, AND LEGAL RESEARCH IN CONNECTION WITH SAME (1.7); COMMUNICATIONS WITH COCOUNSEL AND ASSIGNEE'S TEAM REGARDING D&O CLAIMS, TRAVEL INSURANCE MATTERS, AND OTHER CASE MATTERS (.6); COMMUNICATIONS WITH CLAIMS TRADER REGARDING STATUS AND REVIEW DOCUMENTATION (.3); COMMUNICATIONS WITH TEAM REGARDING PHELPS FEE APPLICATION AND OTHER RELATED MATTERS (.5).	3.10
11/04/22	IMH	FOLLOW UP ANALYSIS REGARDING RESPONSE TO DUTCH TRUSTEE (.3); TEAM DISCUSSIONS REGARDING NEXT UPCOMING CASE MANAGEMENT CONFERENCE (.2)	0.50
11/04/22	SJC	COMMUNICATIONS WITH COUNSEL FOR PBGC AND TEAM REGARDING SETTLEMENT (.4); COMMUNICATIONS WITH TEAM AND ASSIGNEE'S TEAM REGARDING FOREIGN JUDGE LETTER RESPONSE (.3).	0.70
11/06/22	IMH	REVIEW MATERIALS FOR CALL WITH PBGC	0.30
11/07/22	IMH	EMAILS REGARDING CLAIMS OF PBGC (.2); PREPARE FOR HANDS ON STATUS CALL WITH ASSIGNEE (.4); PARTICIPATE IN SAME (.4); FOLLOW UP REGARDING RECENT PROPOSAL TO FORESTERS REGARDING ADDITIONAL DISCOVERY (.2); STRATEGIZE REGARDING POTENTIAL DISTRIBUTION INCLUDING TIMING AND SCOPE OF CLAIM OBJECTIONS (.3); DISCUSSIONS REGARDING CORRESPONDENCE FROM ARCH (.2)	1.70
11/07/22	CC	ATTEND TEAM STATUS CALL.	0.50
11/07/22	CC	UPDATE TASK LIST.	0.30
11/07/22	CC	FINALIZE AND EMAIL LETTER TO SUPERVISORY JUDGE DE VRIES RE PRODUCTION OF DOCUMENTS.	0.20

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
11/07/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CREDIT CARD COMPANY ISSUES, D&O MATTERS, FOREIGN JUDGE REQUEST, CLAIMS TRADERS, FORESTERS MATTER, LANDLORD LITIGATION, AND OTHER CASE MATTER (1.7); COMMUNICATIONS WITH PBGC REGARDING SETTLEMENT AND PREPARE FOR SETTLEMENT CONFERENCE (1.3); COMMUNICATIONS WITH TEAM AND ASSIGNEE'S TEAM REGARDING RESPONSE TO DUTCH JUDGE DEMAND, FINALIZE AND SERVE SAME (.6); REVIEW DOCKETS AND FILINGS IN RELATED CASES (.6); REVIEW PROPOSED PROTECTIVE ORDER RELATING TO INSURANCE MATTERS AND COMMUNICATIONS WITH TEAM REGARDING SAME AND RESEARCH REGARDING SAME (.7).	4.90
11/08/22	IMH	PREPARE FOR AND PARTICIPATE IN CONF CALL WITH REPRESENTATIVES FROM PBGC REGARDING GLOBAL SETTLEMENT (.6); FOLLOW UP CALL WITH M HEALY REGARDING SAME (.2); ATTN TO FOLLOW UP ANALYSIS AND ISSUES NEEDED IN AGREEMENT FOR RESOLVING SAME (.8); EMAILS WITH COURT REGARDING NEXT CASE MANAGEMENT CONFERENCE AND FOLLOW UP WITH ASSIGNEE REGARDING SAME (.2)	1.80
11/08/22	SJC	PREPARE FOR AND ATTEND SETTLEMENT CONFERENCE WITH PBGC, AND FOLLOW UP COMMUNICATIONS WITH PBGC, TEAM, AND ASSIGNEE REGARDING SETTLEMENT, AND DRAFT SETTLEMENT AGREEMENT, MOTION TO APPROVE SAME, AND ORDER APPROVING SAME, AND CIRCULATE ALL TO TEAM, AND LEGAL RESEARCH IN CONNECTION WITH SAME (6.2); COMMUNICATIONS WITH ASSIGNEE REGARDING INSURANCE ISSUES AND PROTECTIVE ORDER (.3); COMMUNICATIONS WITH TEAM REGARDING CASE MANAGEMENT CONFERENCE AND OTHER SCHEDULING MATTERS (.2); CONFERENCE CALL WITH COUNSEL FOR CREDITOR REGARDING STATUS AND CLAIMS (.2).	6.90
11/09/22	IMH	WORK ON PBGC SETTLEMENT PAPERS (1.5); REVIEW CORRESPONDENCE AND STRATEGIZE REGARDING LATEST RESPONSE AND PROPOSAL FROM S LUDINGTON REGARDING SCOPE OF FORESTERS DISCOVERY (.3)	1.80
11/09/22	CC	PREPARE AND UPLOAD ORDER CANCELLING INTERIM CASE MANAGEMENT CONFERENCE ON OCTOBER 19, 2022	0.20
11/09/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND COUNSEL FOR FORESTERS	4.30

## F E E S

Date	Attorney	Description	Hours
		REGARDING DISCOVERY MATTERS, WORK ON SAME, AND RECEIPT AND REVIEW OF MEMO REGARDING SAME (1.8); COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING PBGC SETTLEMENT AGREEMENT, MOTION TO APPROVE, AND ORDER, AND CONTINUE WORKING ON SAME, AND CIRCULATE SAME TO ASSIGNEE AND TO PBGC (2.4); REVIEW AND SUBMIT ORDER CANCELLING INTERIM CASE MANAGEMENT CONFERENCE AND COMMUNICATIONS WITH TEAM REGARDING SAME (.1).	
11/10/22	IMH	ATTN TO FOLLOW UP ISSUES RELATED TO TODAY'S MEET AND CONFER IN FORESTERS (.7)	0.70
11/10/22	SJC	PREPARE FOR AND ATTEND MEET AND CONFER DISCOVERY CONFERENCE WITH COUNSEL FOR FORESTERS, AND FOLLOW UP CONFERENCE CALLS, MEETINGS, AND EMAIL COMMUNICATIONS WITH TEAM AND COUNSEL FOR FORESTERS REGARDING SAME AND DISCOVERY REVIEW PROJECT AND RELATED ISSUES (2.1); CONFERENCE CALL WITH COUNSEL FOR CREDITOR REGARDING CLAIMS REVIEW PROCESS (.2).	2.30
11/10/22	JGT	COMMUNICATIONS WIT THE LITIGATION TEAM AND WORKING ON INITIAL HIGHLIGHTING AND SEARCHES FOR THE DISCOVERY TEAM.	0.50
11/11/22	IMH	WORK WITH ESI TEAM REGARDING ADDITIONAL PRODUCTION AND SEARCHES (.5); STRATEGIZE REGARDING POTENTIAL FIRST ROUND OF OBJECTIONS TO CLAIMS AND ANALYSIS REGARDING RELATED ISSUES (.8); ATTN TO ISSUES RELATED TO PBGC SETTLEMENT (.5)	1.80
11/11/22	SJC	LEGAL AND FACTUAL RESEARCH IN CONNECTION WITH FORESTERS DISPUTE AND CONFERENCE CALL WITH TEAM REGARDING SAME (1.4); COMMUNICATIONS WITH TEAM AND SPECIAL COUNSEL AND REVIEW INVOICES REGARDING SPECIAL COUNSEL FEE APPLICATIONS (.2)	1.60
11/11/22	JGT	WORKING WITH THE LITIGATION AND DISCOVERY TEAMS AND SETTING UP SEARCHES TO BEGIN REVIEW TARGETED SET OF POTENTIALLY PRIVILEGED DOCUMENTS, THEN BEGINNING REVIEW OF THESE DOCUMENTS.	2.20
11/11/22	MER	REVIEWED HUNDREDS OF DOCUMENTS FOR PRIVILEGE.	3.00
11/14/22	PSS	WEEKLY STATUS AND STRATEGY CALL	0.50

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
11/14/22	IMH	PREPARE AGENDA FOR HANDS ON WEEKLY CALL WITH ASSIGNEE AND TEAM (.2); PREPARE FOR (.2) AND PARTICIPATE IN SAME (.7); CALL WITH CLERK'S OFFICE REGARDING UPCOMING CASE MANAGEMENT CONFERENCES (.2); FOLLOW UP WITH PBGC REGARDING OPEN ISSUES RELATED TO SETTLEMENT (.2); CONFER WITH E DISCOVERY TEAM REGARDING OPEN DISCOVERY REQUESTS AND DISCUSS STREAMLINING OF REVIEW PROCESS (.4); WORK ON PROCEDURES FOR OBJECTIONS TO CLAIMS (.5)	2.40
11/14/22	CC	WORK ON FINAL FEE APPLICATION OF PHELPS DUNBAR.	0.70
11/14/22	CC	ATTEND TEAM STATUS CALL.	0.50
11/14/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ESI TEAM REGARDING NEW FORESTERS SEARCHES (.9); COMMUNICATIONS WITH D&O SPECIAL COUNSEL AND CIRCULATE FORM, AND REVIEW CLAIMS (.6); CONFERENCE CALLS, MEETINGS, AND EMAIL COMMUNICATIONS WITH TEAM REGARDING PBGC SETTLEMENT AND DOCUMENTS, DISCOVER ON TRAVEL INSURANCE COMPANIES AND RELATED COMMUNICATIONS, CLAIMS OBJECTIONS AND CLAIMS PROCEDURE MOTION, RESORTS WORLD LITIGATION, CALIFORNIA LETTER OF CREDIT, AND FORESTERS DISCOVERY (2.8); REVIEW DISCOVERY ORDERS ENTERED IN FORESTERS MATTER (.1)	4.40
11/14/22	JGT	REVIEWING HUNDREDS OF DOCUMENTS FOR PRIVILEGE IN SEARCHES WITHIN THE REVIEW DATABASE.	1.70
11/14/22	JGT	MEETING WITH THE LITIGATION TEAM AND WORKING ON NEW SEARCH TERMS AND TARGETED SEARCHES FOR THE DISCOVERY TEAM AND PROVIDING GUIDANCE TO BOTH TEAMS.	0.80
11/14/22	MER	REVIEWED HUNDREDS OF DOCUMENTS FOR PRIVILEGE.	5.00
11/15/22	IMH	FOLLOW UP REGARDING COURT'S REQUIREMENTS FOR UPCOMING CASE MANAGEMENT CONFERENCES (.2)	0.20
11/15/22	SJC	REVIEW ADDITIONAL DOCUMENTS FOR PRODUCTION TO FORESTERS AND COMMUNICATIONS WITH ESI TEAM REGARDING PRODUCTION, AND REVIEW DRAFT FORESTERS ORDER CONTINUING PRETRIAL DEADLINES AND COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING SAME (2.8); REVIEW FEE APPLICATION FOR SPECIAL COUNSEL AND	3.80



**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		COMMUNICATIONS WITH SPECIAL COUNSEL AND TEAM REGARDING SAME (.8); COMMUNICATIONS WITH COUNSEL FOR TRAVEL INSURANCE COMPANY (.2)	
11/15/22	JGT	REVIEWING HUNDREDS OF DOCUMENTS FOR PRIVILEGE IN SEARCHES WITHIN THE REVIEW DATABASE.	2.20
11/15/22	MER	REVIEWED HUNDREDS OF DOCUMENTS FOR PRIVILEGE.	8.00
11/16/22	IMH	ANALYSIS OF PROCEDURE FOR SEEKING DISCOVERY FROM NON-PARTIES AND STRATEGIZE REGARDING SAME (.5)	0.50
11/16/22	SJC	DRAFT SUBPOENAS AND DOCUMENT REQUEST ON TRAVEL INSURANCE COMPANIES, RESEARCH IN CONNECTION WITH SAME, AND MEETINGS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING SAME (1.6); DRAFT CLAIMS OBJECTION PROCEDURE MOTION, AND RESEARCH REGARDING SAME, AND COMMUNICATIONS WITH TEAM REGARDING SAME (1.4); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM, ASSIGNEE, AND CLAIMS ASSIGNEE REGARDING STATUS, AND RESEARCH REGARDING CLAIMS TRANSFER ISSUES (1.1); MEETING WITH ESI DIRECTOR REGARDING STATUS OF FORESTERS REVIEW PROJECT (.2); COMMUNICATIONS WITH COUNSEL FOR TRAVEL INSURANCE COMPANY (.1).	4.40
11/16/22	JGT	REVIEWING ANOTHER SET OF DOCUMENTS FOR PRIVILEGE IN SEARCHES WITHIN THE REVIEW DATABASE.	0.80
11/16/22	MER	REVIEWED HUNDREDS OF DOCUMENTS FOR PRIVILEGE.	5.00
11/17/22	IMH	TEAM DISCUSSIONS REGARDING OPEN ISSUES RELATED TO NEXT ROUND OF PRODUCTION TO FORESTERS AND STRATEGIZE REGARDING RESOLUTION OF SAME (.8); EMAILS RELATED TO OPEN ISSUES FOR PBGC SETTLEMENT (.2)	1.00
11/17/22	CC	FINALIZE AND E-FILE FINAL MOTION FOR APPROVAL AND PAYMENT OF FEES AND EXPENSES OF PHELPS DUNBAR.	0.60
11/17/22	CC	WORK ON MOTION TO APPROVE OBJECTIONS TO CLAIM PROCEDURES.	0.90
11/17/22	CC	WORK ON, FINALIZE AND E-FILE FINAL MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY PHELPS DUNBAR.	0.80

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
11/17/22	SJC	PREPARE FOR AND ATTEND CONFERENCE CALL WITH COUNSEL FOR TRAVEL INSURANCE COMPANY REGARDING CLAIMS ISSUES, CONFIDENTIALITY, AND OTHER RELATED MATTERS, AND RESEARCH IN CONNECTION WITH SAME, AND BEGIN REVISING CONFIDENTIALITY ORDER FORM (1.5); CONTINUE WORKING ON CLAIMS OBJECTION PROCEDURE MOTION (.7); REVIEW DRAFT CONFIDENTIALITY ORDER AND TOLLING AGREEMENT IN CONNECTION WITH D&O DISPUTE AND COMMUNICATIONS WITH CO-COUNSEL AND TEAM REGARDING SAME, BERMUDA PROCEEDINGS, AND OTHER RELATED MATTERS (1.4); COMMUNICATIONS WITH PBGC REGARDING SETTLEMENT AND DOCUMENTATION (.2); CONFERENCE WITH ESI TEAM REGARDING FORESTERS REVIEW (.3); FINALIZE AND FILE PHELPS DUNBAR FEE APPLICATION (.3).	4.40
11/17/22	JGT	REVIEWING OVER HUNDRED DOCUMENTS FOR PRIVILEGE IN SEARCHES WITHIN THE REVIEW DATABASE, PLUS WORKING ON ADDITIONAL PRODUCTION FOR THE LITIGATION TEAM.	1.70
11/18/22	IMH	STRATEGIZE REGARDING NEXT STEPS WITH ARCH AND ANALYSIS IN SUPPORT OF MOTION FOR PROTECTION FOR TRAVEL INSURANCE (.9); EMAILS REGARDING CLAIMS PROCEDURE MOTION (.2); TEAM EMAILS REGARDING LATEST PRODUCTION TO FORESTERS (.1)	1.20
11/18/22	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF FILING AFFIDAVIT OF SERVICE OF FINAL MOTION FOR APPROVAL AND PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES INCURRED BY PHELPS DUNBAR.	0.40
11/18/22	JLH	CREATE CRYSTAL PROD005 DOCUMENT PRODUCTION	0.50
11/18/22	JLH	IMAGE ECLIPSE NATIVE FILES FOR PRODUCTION PREP	1.80
11/18/22	SJC	PREPARE FOR AND ATTEND CONFERENCE CALL WITH ASSIGNEE AND PURCHASER OF CLAIMS, AND FURTHER CONFERENCES AND EMAIL COMMUNICATIONS WITH ASSIGNEE REGARDING SAME AND RELATED CASE AND CLAIMS MATTERS (1.5); COMMUNICATIONS WITH ESI TEAM REGARDING FORESTERS PRODUCTION (.3); COMMUNICATIONS WITH SPECIAL LITIGATION CO-COUNSEL AND BERMUDA COUNSEL REGARDING INTERSECTING ISSUES (.4); COMMUNICATIONS WITH COUNSEL FOR C BREIER AND ASSIGNEE REGARDING SETTLEMENT AND WITHDRAWAL OF CLAIM (.3)	2.50

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
11/18/22	JGT	COMPLETING REVIEW OF DOCUMENTS FOR PRIVILEGE IN SEARCHES IN THE REVIEW DATABASE AND THEN PREPARING TAGS AND FIELDS FOR THE NEXT PRODUCTION SET, AS WELL AS PREPARING A SMALLER TARGETED PRODUCTION SET WITH THE DISCOVERY TEAM.	1.70
11/18/22	MER	REDACTIONS OF THE NEXT SET.	0.50
11/21/22	IMH	PREPARE FOR WEEKLY HANDS ON CALL WITH ASSIGNEE AND TEAM (.3); PARTICIPATE IN SAME (.8)	1.10
11/21/22	CMG	DATA STAGING, PROCESSING AND OVERLAYING IMAGES INTO ECLIPSE REVIEW PLATFORM	5.50
11/21/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM AND ASSIGNEE REGARDING CLAIMS REVIEW AND OBJECTION PROCESS, D&O CLAIMS, FORESTERS DISCOVERY MATTERS, LANDLORD CLAIMS AND ISSUES, PBGC SETTLEMENT, TRAVEL INSURANCE SUBPOENAS AND PROTECTIVE ORDER, AND OTHER CASE MATTERS (1.2); CONTINUE WORKING ON SUBPOENA TO TRAVEL INSURANCE COMPANIES (.6); COMMUNICATIONS WITH ASSIGNEE'S TEAM REGARDING FORESTERS DISCOVERY (.2)	2.00
11/21/22	JGT	WORKING ON PRODUCTION SEARCHES, TAGS, IMAGING AND OTHER PREPARATIONS FOR THE NEXT PRODUCTION AND PRIVILEGE SETS.	0.80
11/22/22	IMH	ATTN TO OPEN ISSUES RELATED TO REMAINING DOCUMENT PRODUCTION TO FORESTERS	0.50
11/22/22	SJC	COMMUNICATIONS WITH ASSIGNEE'S TEAM, ESI TEAM AND TEAM REGARDING FORESTERS DISCOVERY MATTERS AND CONTINUE WORKING ON SAME	1.10
11/22/22	JGT	WORKING ON MORE PRODUCTION QC REVIEW AND COMMUNICATING WITH THE LITIGATION TEAM.	0.50
11/23/22	IMH	TEAM DISCUSSIONS AND ANALYSIS OF ASSIGNMENT CLAIMS (.8)	0.80
11/23/22	SJC	ANALYZE PROOF OF CLAIM AND SUPPORTING DOCUMENTS FROM BANK CREDITOR AND SEND MEMO TO ASSIGNEE REGARDING SAME, AND CONFERENCE CALL REGARDING SAME (1.1); PREPARE FOR AND ATTEND CONFERENCE CALL WITH ASSIGNEE'S TEAM REGARDING FORESTERS 2ND AND 3RD RFP ISSUES, COMMUNICATIONS WITH ESI TEAM REGARDING PRODUCTION OF DOCUMENTS FROM 1ST RFP NOT PREVIOUSLY PRODUCED AS WELL AS NEW SEARCH RESULTS, FINALIZE RESPONSE AND	4.60

## F E E S

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		OBJECTIONS TO 2ND AND 3RD RFP AND COMMUNICATIONS WITH TEAM REGARDING SAME, AND DRAFT CORRESPONDENCE TO COUNSEL FOR FORESTERS REGARDING NEW SEARCH RESULTS, DOCUMENTS NOT PREVIOUSLY PRODUCED, AND DOCUMENTS RESPONSIVE TO 2ND AND 3RD RFP (3.4); COMMUNICATIONS WITH COCOUNSEL REGARDING BERMUDA AND D&O MATTERS (.1)	
11/23/22	JGT	WORKING ON PRODUCTION SEARCHES, TARGETED PRIVILEGE QC, COMMUNICATING WITH THE DISCOVERY TEAM ON GUIDANCE FOR PRODUCTION AND PRIVILEGE EXPORT SETS.	1.20
11/28/22	IMH	PREPARE FOR HANDS ON CALL WITH ASSIGNEE INCLUDING REVISIONS TO TASK LIST AND FOLLOW UP REGARDING OPEN ITEMS (.5); PARTICIPATE IN SAME (.5); COMMUNICATE WITH PBGC REGARDING OPEN ISSUES RELATED TO SETTLEMENT (.2)	1.20
11/28/22	CC	ATTEND TEAM STATUS CALL.	0.50
11/28/22	CC	UPDATE TASK LIST.	0.30
11/28/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING PBGC SETTLEMENT AND PLAN TERMINATION, CLAIMS ISSUES, FORESTERS MATTER, TRAVEL INSURANCE COMPANIES, RESORTS WORLD LITIGATION AND OTHER CASE MATTERS (1.1); COMMUNICATIONS WITH PBGC COUNSEL REGARDING SETTLEMENT AND PENSION PLAN STATUS (.2); COMMUNICATIONS WITH ESI TEAM AND ASSIGNEE'S TEAM REGARDING FORESTERS PRODUCTION AND BEGIN PREPARING SAME (.9); COMMUNICATIONS WITH COUNSEL AT PHELPS DUNBAR REGARDING FINAL FEE APPLICATION (.2)	2.40
11/28/22	JGT	WORKING ON LARGE PRODUCTION AND COMMUNICATING WITH THE DISCOVERY TEAM ON SPECIFICATIONS AND EXPORTING THE POTENTIAL PRIVILEGE DATA.	1.10
11/29/22	CMG	PREPARATION OF ELECTRONIC DOCUMENT PRODUCTION; CREATION OF SHAREFILE LINK FOR DATA TRANSMITTAL	3.50
11/29/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE REGARDING TRAVEL INSURANCE COMPANY CLAIMS AND DISCOVERY AND WORK ON SAME (.5); FINALIZE AND SERVE DISCOVERY RESPONSES TO SECOND AND THIRD REQUEST FOR PRODUCTION ON FORESTERS, AND FINALIZE AND SERVE TWO DIFFERENT PRODUCTIONS OF	2.80

## F E E S

Date	Attorney	Description	Hours
		DOCUMENTS ON FORESTERS, AND COMMUNICATIONS WITH ESI TEAM AND COUNSEL FOR FORESTERS REGARDING SAME, REVIEW AND PREPARE FOR PROCESSING ADDITIONAL DOCUMENTS RESPONSIVE TO SECOND AND THIRD REQUESTS FOR PRODUCTION AND COMMUNICATIONS WITH ESI TEAM REGARDING SAME AND PRODUCTION (2.2); COMMUNICATIONS WITH PBGC COUNSEL REGARDING STATUS (.1).	
11/29/22	JGT	REVIEWING PRODUCTION, COMMUNICATING WITH THE LITIGATION TEAM ON DELIVERY, AND UPLOADING AND TRANSFERRING ADDITIONAL DOCUMENTS TO BE INCLUDED IN THE NEXT PRODUCTION SET.	0.80
11/30/22	IMH	FOLLOW UP WITH ASSIGNEE REGARDING LATEST PRODUCTION TO FORESTERS (.2); EMAILS WITH TEAM REGARDING TIMING OF PBGC SETTLEMENT (.2); STRATEGIZE REGARDING GENTING APPEARANCE IN CASES (.3); FOLLOW UP REGARDING FIRST ROUND OF CLAIM OBJECTIONS (.2)	0.90
11/30/22	SJC	REVIEW DATA ON GENTING SALES AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND COCOUNSEL REGARDING SAME AND RESORTS WORLD LITIGATION, AND REVIEW DOCKET (.8); COMMUNICATIONS WITH ESI DIRECTOR REGARDING NEW FORESTERS PRODUCTION AND REVIEW NOTICE OF INTENT TO ISSUE SUBPOENA TO CITIBANK BY FORESTERS (.6).	1.40
11/30/22	JGT	WORKING ON WITH NEW DOCUMENTS FOR THE DISCOVERY TEAM TO LOAD AND EVENTUAL PRODUCE AS WELL AS COMMUNICATING WITH THE LITIGATION TEAM AND SETTING UP SEARCHES AND PROCESS TO POTENTIAL PRIVILEGE DATA.	1.30
12/01/22	IMH	ATTENTION TO ISSUES REGARDING PRIVILEGE LOG REQUESTED BY FORESTERS (.3); REVISE WORKING TEAM TASK LIST (.2)	0.50
12/01/22	SJC	COMMUNICATIONS WITH COUNSEL FOR FORESTERS AND ESI TEAM REGARDING VARIOUS DISCOVERY PRODUCTIONS, DISPUTES, MEET AND CONFER, AND THIRD PARTY DISCOVERY.	1.00
12/01/22	JGT	WORKING WITH THE LITIGATION AND DISCOVERY TEAMS ON PRODUCTION AND PRIVILEGE QUESTIONS.	0.20
12/02/22	IMH	TEAM DISCUSSIONS AND ANALYSIS REGARDING CLAIMS OBJECTIONS AND PROCEDURES TO BE FILED WITH THE COURT	0.90

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
12/02/22	SJC	CONFERENCE CALL WITH CO-COUNSEL REGARDING D&O LITIGATION, BERMUDA ISSUES, AND OTHER MATTERS, REVIEW RELATED DOCUMENTS AND DRAFTS, AND RESEARCH IN CONNECTION WITH SAME (1.3); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND ASSIGNEE'S TEAM REGARDING TRAVEL INSURANCE ISSUES, FMC ISSUES, AND OTHER CASE MATTERS, AND REVIEW AND ANALYZE DOCUMENTS RELATING TO SAME (1.7)	3.00
12/05/22	IMH	REVIEW AND REVISE WORKING TEAM TASK LIST (.3); ATTENTION TO FORESTERS' FILINGS AND REQUESTS FOR DOCUMENTS FROM THIRD PARTIES (.2); PREPARE DISCOVERY FOR TRAVEL INSURANCE COMPANIES (.4)	0.90
12/05/22	CMG	PREPARATION OF ELECTRONIC DOCUMENT PRODUCTION; CREATION OF SHAREFILE LINK FOR DATA TRANSMITTAL	0.40
12/05/22	SJC	REVIEW AND ANALYZE AGREEMENTS AND OTHER DOCUMENTS IN CONNECTION WITH FEDERAL MARITIME COMMISSION REQUIREMENTS, LEGAL RESEARCH IN CONNECTION WITH SAME, AND DISCUSSION OF ANALYSIS WITH ASSIGNEE AND TEAM (1.8); FINALIZE AND PRODUCE DOCUMENTS RESPONSIVE TO FORESTERS 2ND REQUEST FOR PRODUCTION AND COMMUNICATIONS WITH ESI TEAM AND COUNSEL FOR FORESTERS REGARDING SAME, AND COMMUNICATIONS WITH ASSIGNEE REGARDING FORESTERS DISCOVERY TO CITIBANK (.8); CONTINUE REVISING FORM OF SUBPOENA FOR TRAVEL INSURANCE COMPANIES, REVIEW PROOFS OF CLAIM FILED BY TRAVEL INSURANCE COMPANIES, LEGAL RESEARCH, AND CIRCULATE DRAFT OF SAME TO TEAM (1.2); REVIEW DRAFT AGREEMENTS WITH D&O LITIGATION PARTICIPANTS AND COMMUNICATIONS WITH SPECIAL COUNSEL REGARDING SAME (.7)	4.50
12/05/22	JGT	WORKING WITH THE LITIGATION AND DISCOVERY TEAMS ON THE NEXT PRODUCTION SET AND PREPARING SEARCHES FOR THE TEAM.	0.80
12/06/22	IMH	FOLLOW UP REGARDING COMMUNICATIONS WITH THE FEDERAL MARITIME COMMISSION (.2); STRATEGIZE REGARDING FURTHER DOCUMENT REQUESTS TO TRAVEL INSURANCE COMPANIES (.2)	0.40
12/06/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING TRAVEL INSURANCE COMPANY DISCOVERY AND CLAIMS ISSUES (.7); COMMUNICATIONS WITH ASSIGNEE, TEAM, AND ASSIGNEE'S TEAM REGARDING FMC AGREEMENTS	2.10

## F E E S

Date	Attorney	Description	Hours
		AND FUNDS AND RELATED CLAIMS ISSUES, AND RESEARCH IN CONNECTION WITH SAME (1.2); COMMUNICATIONS REGARDING D&O DISPUTE (.2). 2.1	
12/06/22	JGT	WORKING WITH THE DISCOVERY TEAMS ON ONE MORE POTENTIAL PRODUCTION AND PRIVILEGE LOG QUESTIONS.	0.50
12/07/22	IMH	RESEARCH IN SUPPORT OF CLAIMS PROCEDURES MOTION (.8); TEAM EMAILS REGARDING TERMINATION OF PBGC PLAN (.2); ATTN TO ADMINISTRATIVE ISSUES FOR NEXT ROUND OF PROFESSIONAL FEE APPLICATION REQUESTS (.4)	1.40
12/07/22	CC	DOWNLOAD CRYSTAL 2020 TAX RETURN FINANCIALS RECEIVED FROM B. STRAKA.	0.30
12/07/22	SJC	COMMUNICATIONS WITH TEAM REGARDING ASSIGNOR RECORDS AND DISCOVERY MATTERS, AND ORGANIZATION (.6); CONFERENCE CALL WITH ASSIGNEE REGARDING CLAIMS ISSUES AND DISCOVERY AND REVIEW RECORDS RELATING TO SAME (.5); REVISE, FINALIZE, AND CIRCULATE FORM SUBPOENA TO TRAVEL INSURANCE COMPANIES, RESEARCH REGARDING SAME AND COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (1.0).	2.10
12/08/22	IMH	FOLLOW UP WITH ASSIGNEE'S OFFICE REGARDING DOCUMENT REQUESTS TO TRAVEL INSURANCE COMPANIES (.2); ATTN TO UPCOMING STATUS CONFERENCES WITH COURT (.2) REVIEW UPCOMING DEADLINES IN CONNECTION WITH FORESTERS (.2); TEAM CALL REGARDING VARIOUS OPEN MATTERS AND REVISIONS TO TEAM TASK LIST (.2); COMMUNICATE WITH COURT REGARDING 2/16 PRETRIAL CONFERENCE (.2)	1.00
12/08/22	SJC	COMMUNICATIONS WITH BERMUDA COUNSEL AND TEAM REGARDING FEE APPLICATIONS AND STATUS (.2); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING THIRD PARTY DISCOVERY, RESORTS WORLD LITIGATION, AND OTHER MATTERS (.7); COMMUNICATIONS WITH COUNSEL FOR FORESTERS, TEAM, AND CHAMBERS STAFF REGARDING PRETRIAL CONFERENCE AND OTHER DATES AND DEADLINES, AND OTHER DISCOVERY AND TRIAL PREPARATION MATTERS (1.1)	2.00
12/09/22	IMH	TEAM DISCUSSIONS REGARDING CLAIMS ISSUES AND ANALYSIS (.6); ANALYSIS RELATED TO PBGC TERMINATION PROPOSAL (.9)	1.50
12/09/22	SJC	CONFERENCE CALLS WITH ASSIGNEE AND TEAM	2.40

## F E E S

Date	Attorney	Description	Hours
		REGARDING DISCOVERY ON TRAVEL INSURANCE COMPANIES AND OTHER CASE MATTERS, AND REVISE AND CIRCULATE FURTHER DRAFT OF SAME (1.3); RECEIPT AND REVIEW OF PROPOSED TERMINATION AGREEMENT FROM PBGC AND COMMUNICATIONS WITH COUNSEL FOR PBGC, TEAM, AND ASSIGNEE REGARDING SAME AND SETTLEMENT, AND BEGIN REVISING SETTLEMENT (.9); COMMUNICATIONS WITH TEAM REGARDING SCHEDULING MATTERS (.2)	
12/12/22	IMH	REVISE WORKING TEAM TASK LIST AND PREPARE FOR HANDS ON CALL WITH ASSIGNEE AND PROFESSIONALS (.4); PARTICIPATE IN SAME (.6); ATTN TO FOLLOW UP DELIVERABLES (.3); REVISE PBGC MOTION AFTER REVIEWING EMAILS AND ADDITIONAL DOCUMENTS PROVIDED REGARDING TERMINATION (.6); DISCUSSION WITH HEALY REGARDING STATUS OF CLAIMS ANALYSIS (.2); STRATEGIZE REGARDING FIRST ROUND OF OBJECTIONS (.2) DISCUSSION WITH ASSIGNEE AND TEAM REGARDING HEARING ON SUMMARY JUDGMENT IN FORESTERS (.2)	2.50
12/12/22	CC	UPDATE TASK LIST.	0.30
12/12/22	CC	ATTEND TEAM STATUS CALL.	0.60
12/12/22	CC	FINALIZE AND UPLOAD ORDER GRANTING FINAL MOTION FOR APPROVAL OF PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES - PHELPS DUNBAR, LLP.	0.30
12/12/22	SJC	REVIEW AND ANALYZE TERMINATION AND TRUSTEESHIP AGREEMENT FROM PBGC TO ASSIGNEE AND CIRCULATE COMMENTS TO SAME, REVIEW PROPOSED REVISIONS TO SETTLEMENT AGREEMENT AND MOTION TO APPROVE SAME FROM PBGC, AND MAKE FURTHER REVISIONS TO SAME, AND CIRCULATE SAME ALONG WITH FURTHER REVISIONS TO ORDER, AND FURTHER COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (3.1); CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING CLAIMS ISSUES, TRAVEL INSURANCE MATTERS, FORESTERS DISPUTE, RESORTS WORLD DISPUTE, AND OTHER MATTERS (1.6); REVIEW AND SUBMIT ORDER ON PHELPS DUNBAR FEE APPLICATION (.1); COMMUNICATIONS WITH COUNSEL FOR FORESTERS REGARDING MEET AND CONFER SCHEDULING (.1);	4.90
12/13/22	IMH	REVISE REQUESTS TO TRAVEL INSURANCE COMPANIES SUBJECT OF SUBPOENAS (.8);	1.30



## F E E S

Date	Attorney	Description	Hours
		PARTICIPATE WITH NELSON MULLENS IN MEET AND CONFER (.3); STRATEGIZE REGARDING EXPERTS IN FORESTERS LITIGATION (.2)	
12/13/22	SJC	WORK ON SUBPOENAS TO TRAVEL INSURANCE COMPANIES AND CONFERENCE CALLS AND EMAIL COMMUNICATIONS WITH ASSIGNEE AND TEAM REGARDING SAME (1.1); PREPARE FOR AND ATTEND MEET AND CONFER SESSION WITH COUNSEL FOR FORESTERS AND MEETINGS AND EMAIL COMMUNICATIONS WITH TEAM REGARDING SAME, REVIEW PROPOSED SCHEDULING ORDER AND PROVIDE COMMENTS (1.5).	2.60
12/14/22	IMH	EMAILS AND TEAM FOLLOW UP REGARDING UPCOMING CASE MANAGEMENT CONFERENCES AND PROVIDE INFORMATION TO CREDITORS REQUESTING SAME (.5); REVIEW PENDING FEE APPLICATIONS AND COMMUNICATE WITH ASSIGNEE PROFESSIONALS REGARDING SUBMISSION OF NEXT SET TO BE FILED WITH THE COURT (.5)	1.00
12/14/22	CC	PREPARE AND UPLOAD ORDER CANCELING INTERIM CASE MANAGEMENT CONFERENCE SCHEDULED FOR DECEMBER 21, 2022.	0.40
12/14/22	SJC	COMMUNICATIONS WITH TEAM REGARDING CLAIMS MATTERS AND SCHEDULING, AND OTHER CASE MATTERS (.6); COMMUNICATIONS WITH CHAMBERS, TEAM, AND CREDITORS REGARDING INTERIM CASE MANAGEMENT CONFERENCE, REVIEW ORDER AND SUBMIT SAME (.3); COMMUNICATION WITH COUNSEL FOR FORESTERS AND CHAMBERS REGARDING CANCELLING INTERIM CASE MANAGEMENT CONFERENCE AND REVIEW ORDER FOR SAME (.3). RESEARCH IN CONNECTION WITH CLAIMS PRIORITY (.8)	2.00
12/15/22	IMH	ANALYSIS IN SUPPORT OF DOCUMENTS NEEDED FOR SUMMARY JUDGMENT ON FORESTERS (1.70; TEAM EMAILS AND STRATEGIZE REGARDING OPEN ISSUES RELATED TO PBGC SETTLEMENT (.6)	2.30
12/15/22	SJC	CONFERENCE CALL WITH ASSIGNEE REGARDING ESTATE REFUNDS AND PBGC MATTERS (.2); FINALIZE AND CIRCULATE REVISED MOTION TO APPROVE SETTLEMENT, SETTLEMENT AGREEMENT, AND PROPOSED ORDER TO PBGC ALONG WITH COMMENTS TO TRUSTEESHIP AND TERMINATION AGREEMENT, AND CONFERENCE CALL WITH ASSIGNEE REGARDING SAME (1.2)	1.40
12/16/22	IMH	TEAM DISCUSSIONS REGARDING REMAINING OPEN ISSUES WITH PBGC SETTLEMENT DOCUMENTS AND	1.30

## F E E S

Date	Attorney	Description	Hours	
		STRATEGIZE REGARDING FINALIZING SAME (.9); FOLLOW UP WITH PBGC REPRESENTATIVES REGARDING SAME (.2); STRATEGIZE REGARDING AMENDED REVISED CASE MANAGEMENT REPORT WITH FORESTERS (.2)		
12/16/22	SJC	REVIEW AND REVISE CASE MANAGEMENT REPORT IN FORESTERS MATTER, REVIEW RELEVANT DOCUMENTS AND PLEADINGS, AND COMMUNICATIONS WITH TEAM AND ESI TEAM REGARDING SAME AND RELATED MATTERS (1.2); MEETING AND COMMUNICATIONS WITH TEAM REGARDING STATUS OF VARIOUS MATTERS (.6).	1.80	
12/16/22	JGT	WORKING ON PRODUCTION LOG WITH THE DISCOVERY TEAM AND COMMUNICATING WITH THE LITIGATION TEAM.	0.50	
12/16/22	MER	CREATED PRODUCTION LOG OF SET 1-7 AT THE REQUEST OF LITIGATION TEAM.	0.80	N/C
12/19/22	IMH	FOLLOW UP WITH ASSIGNEE'S TEAM REGARDING PROCEDURES FOR RESPONDING TO CLAIM INQUIRIES AND STATUS OF OPEN REQUESTS (.3); REVISE "FORM" CREDITOR RESPONSE (.2) REVIEW REVISIONS TO CASE MANAGEMENT REPORT FOR FORESTERS AND STRATEGIZE REGARDING ADDITIONS TO SAME (.3); REVISE TEAM TASK LIST AND DISCUSSIONS REGARDING 2023 FIRST QUARTER PLANNING (.4)	1.20	
12/19/22	SJC	REVIEW REVISED JOINT CASE MANAGEMENT REPORT AND ORDER SETTING TRIAL AND DEADLINES FROM FORESTERS, CIRCULATE COMMENTS REGARDING SAME AND ADDITIONAL COMMUNICATIONS REGARDING SAME (1.0); COMMUNICATIONS WITH CREDITOR REGARDING STATUS (.2); REVIEW REVISED CONFIDENTIALITY ORDER IN D&O DISPUTE AND COMMUNICATIONS WITH COCOUNSEL REGARDING SAME (.5).	1.70	
12/20/22	IMH	WORK WITH ESI TEAM ON DOCUMENTS TO BE PRODUCED IN TRAUNCHES FOR UPCOMING DEPOSITIONS IN FORESTERS (.8); FOLLOW UP WITH CLERK'S OFFICE REGARDING DEADLINES EMANATING FROM REVISED CASE MANAGEMENT ORDER (.2); STRATEGIZE WITH TEAM REGARDING TIMING FOR CLAIM OBJECTIONS (.3)	1.30	
12/20/22	SJC	CONFERENCE CALLS AND EMAIL COMMUNICATIONS REGARDING TRIAL, PRETRIAL MATTERS, AND INTERIM CASE MANAGEMENT CONFERENCES IN FORESTERS MATTER, AND REVIEW VARIOUS ORDERS AND NOTICES ENTERED IN CONNECTION WITH SAME (.8); COMMUNICATIONS REGARDING D&O MATTER	0.90	

**F E E S**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>
		(.1).	
12/22/22	IMH	REVISE WORKING TASK LIST TO INCLUDE DATES OBTAINED FROM THE COURT FOR 2023 (.2)	1.90
12/22/22	CC	UPDATE TASK LIST TO INCLUDE NEW DEADLINES ASSOCIATED WITH NEW FORRESTERS/HEALY TRIAL.	0.80
12/22/22	SJC	COMMUNICATIONS WITH TEAM REGARDING SCHEDULING MATTERS (.2); REVIEW FEE ORDER AND COMMUNICATIONS WITH SPECIAL COUNSEL AND ASSIGNEE REGARDING SAME (.2); CONFERENCE CALL WITH ASSIGNEE REGARDING TRAVEL AGENT CLAIMS AND OTHER CASE ISSUES (.3).	0.70
12/23/22	IMH	PREPARE MATERIALS IN SUPPORT OF SECOND ROUND OF FEE APPLICATIONS FOR ASSIGNEE PROFESSIONALS (.6)	0.60
12/23/22	CC	REVIEW CASE MANAGEMENT ORDERS ENTERED BY THE COURT AND CALCULATED PERTINENT DEADLINES.	0.50
12/23/22	SJC	COMMUNICATIONS WITH TEAM REGARDING STATUS (.1); COMMUNICATIONS REGARDING CREDITOR INQUIRIES (.1)	0.20
12/27/22	SJC	REVIEW DATA FROM ASSIGNEE RELATING TO TRAVEL INSURANCE COMPANIES AND CLAIMS AND COMMUNICATIONS REGARDING SAME (.4); REVIEW NOTES IN CONNECTION WITH PENDING MATTERS (.2).	0.60
<b>Total Hours:</b>			<b>484.80</b>
<b>Total Fees:</b>			<b>216,015.50</b>

**F E E S U M M A R Y**

<b>Attorney</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Samuel J. Capuano	203.90	525.00	107,047.50
Stephanie Chocron Jean	5.00	225.00	1,125.00
Stephanie Chocron Jean	2.50	0.00	0.00
Carmen Cruz	6.80	225.00	1,530.00
Carmen Cruz	59.20	265.00	15,688.00
Milaidy Davila	0.50	0.00	0.00
Deborah Fanich	0.00	0.00	0.00
Charles M. Gantz	10.80	265.00	2,862.00

**FEE SUMMARY**

<b>Attorney</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jeffrey L. Hajny	5.70	265.00	1,510.50
Ilyse M. Homer	111.70	595.00	66,461.50
Myrna E. Roure	36.50	225.00	8,212.50
Myrna E. Roure	2.80	0.00	0.00
Paul S. Singerman	1.50	765.00	1,147.50
Jessie G. Torres	23.80	225.00	5,355.00
Jessie G. Torres	14.10	360.00	5,076.00
<b>Total</b>	<b>484.80</b>		<b>\$216,015.50</b>

**EXPENSES**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
10/04/22	VENDOR: OUELLETTE & MAULDIN COURT REPORTERS, INC; INVOICE#: 972971; DATE: 10/4/2022 - 30806.0001 HEARING - JUDGE ALAN FINE, VIA ZOOM VIDEOCONFERENCE, ATTENDANCE OF REPORTER	125.00
	CONFERENCE CALL CHARGES	126.59
	E-DISCOVERY DATA STORAGE FEE (\$12 PER GB)	14,232.00
	PACER CHARGE	3.30
	REPRODUCTION	13.80
	WESTLAW CHARGES	154.88
<b>Total Expenses</b>		<b>\$14,655.57</b>

<b>CURRENT BALANCE DUE</b>	<b>\$230,671.07</b>
PRIOR BALANCE	681,654.75
LESS PAYMENTS:	553,404.21
PRIOR BALANCE DUE	128,250.54
PLUS CURRENT BALANCE:	230,671.07
<b>TOTAL NOW DUE:</b>	<b>358,921.61</b>

**PAST DUE BALANCE - LIST OF UNPAID INVOICE(S)**

<b>INVOICE NUMBER</b>	<b>INVOICE DATE</b>	<b>TOTAL</b>	<b>LAST PAYMENT DATE</b>	<b>LAST PAYMENT AMOUNT</b>	<b>BALANCE</b>
256797	09/07/22	128,250.54	NONE	0.00	128,250.54
<b>Past Due Balance:</b>					<b>128,250.54</b>

**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 AUGUST 1, 2022 THROUGH DECEMBER 31, 2022**

**THIS CAUSE** came before the Court for hearing on \_\_\_\_\_, February \_\_\_, 2023 at \_\_\_\_\_  
a.m./p.m. 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 August 1, 2022  
Through December 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 \$340,676.25 and  
reimbursement of expenses in the amount of \$18,245.36, for a total interim award of \$358,921.610  
for the period of August 1, 2022 through December 31, 2022. The Court, having considered the

Motion and the record in this proceeding, heard argument of counsel, finding that notice of the Motion and the hearing 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 \$340,676.25 and expenses in the amount of \$18,245.36, for a total award of \$358,921.61, 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 \$358,921.61.
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 February, 2023.

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HONORABLE ALAN FINE  
Circuit Court Judge

Copies furnished to:

Counsel of record