

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p><i>In re:</i></p> <p>AH LIQUIDATION, INC., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No.: 21-10883 (CTG)</p> <p>(Jointly Administered)</p> <p>Objections Due: November 29, 2021 at 4:00 p.m.</p>
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FOURTH MONTHLY FEE APPLICATION OF FOX ROTHSCHILD LLP FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD OF SEPTEMBER 1, 2021 THROUGH SEPTEMBER 30, 2021

Name of Applicant	Fox Rothschild LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	June 10, 2021
Period for which Compensation and Reimbursement is Sought for the Fourth Monthly Period:	September 1, 2021 through September 30, 2021
Amount of Compensation Sought as Actual, Reasonable, and Necessary for the Fourth Monthly Period:	\$45,037.00
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary for the Fourth Monthly Period:	\$79.49

This is a(n): X Monthly _____ Interim ____ Final Fee Application

This is Fox Rothschild’s fourth monthly fee application. The total time expended in connection with the preparation of this fee application is not included herein as such time

¹ The Debtors, along with the last four digits of each Debtor’s federal tax identification number are: Avadim Health, Inc. (8411); Avadim Health IP, Inc. (7594); Bionome Properties Corp. (6483); Quality Assurance Associates, Inc. (5613); and Relion Manufacturing, Inc. (0430). The Debtors’ business address is 81 Thompson Street, Asheville, NC 28803.

was expended after the Compensation Period.

PREVIOUS FEE APPLICATIONS

Application	Dated Filed	Fees Sought	Expenses Sought	CNO Filed	Fees Approved	Expenses Approved
First Monthly [D.I. 226]	7/20/21	\$77,155.00	\$161.03	8/25/21 [D.I. 276]	\$61,724.00	\$161.03
Second Monthly [D.I. 287]	8/27/21	\$36,534.50	\$126.24	9/17/21 [D.I. 318]	\$29,227.60	\$126.24
Third Monthly [D.I. 320]	9/20/21	\$40,747.50	\$0.00	10/26/21 [D.I. 388]	\$32,598.00	\$0.00
	TOTAL:	\$154,437.00	\$287.27		\$123,549.60	\$287.27

**CUMULATIVE SUMMARY OF PROFESSIONAL SERVICES RENDERED BY
FOX ROTHSCHILD LLP AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR THE PERIOD SEPTEMBER 1, 2021 THROUGH
SEPTEMBER 30, 2021**

Timekeeper	Title	Rate	Hours	Total Fees
Gordon E. Gouveia	Partner – Admitted to the Bar of Illinois; Joined Fox Rothschild in 2018	\$550.00	19.6	\$10,780.00
Jeffrey L. Widman	Partner – Admitted to the Bar of Illinois; Joined Fox Rothschild in 2018	\$595.00	15.2	\$9,044.00
Seth A. Niederman	Partner – Admitted to Bars of Delaware and New Jersey. Joined Fox Rothschild in 2004	\$565.00	18.6	\$10,509.00
Joseph A. Caneco	Associate – Admitted to Bars of New Jersey and New York – Joined Fox Rothschild in 2021	\$440.00	25.5	\$11,220.00
Stephanie Slater	Law Clerk	\$355.00	0.9	\$319.50
Robin I. Solomon	Paralegal since 1982; Joined Fox Rothschild in 1987	\$415.00	4.7	\$1,950.00
Marcia L. Steen	Paralegal since 1987; Joined Fox Rothschild in 2010	\$380.00	0.3	\$114.00
Shavone Green	Paralegal since 2016; joined Fox Rothschild in 2021	\$250.00	4.4	\$1,100.00
TOTALS			89.2	\$45,037.00
Total Blended Rate		\$504.90		

**CUMULATIVE SUMMARY OF PROFESSIONAL SERVICES
 RENDERED BY FOX ROTHSCHILD LLP AS CO-COUNSEL TO THE OFFICIAL
 COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD OF
 SEPTEMBER 1, 2021 THROUGH SEPTEMBER 30, 2021**

TASK SUMMARY:

Task	Description	Hours	Total
1	CASE ADMINISTRATION	6.9	\$3,105.00
3	CREDITORS AND CLAIMS	5.0	\$2,916.50
9	PRE-PETITION LITIGATION	0.2	\$113.00
11	PLAN	20.8	\$10,078.50
14	FEE APPLICATIONS	6.5	\$2,627.00
18	SETTLEMENT/ADR	0.2	\$113.00
21	COMMITTEE MEETINGS AND COMMUNICATIONS	1.7	\$935.00
22	OTHER CREDITOR MEETING AND COMMUNICATIONS	0.2	\$113.00
23	COURT HEARINGS	3.7	\$1,921.50
24	ASSET ANALYSIS AND RECOVERY	2.0	\$1,190.00
28	AUTOMATIC STAY	42.0	\$21,924.50

**CUMULATIVE SUMMARY OF EXPENSES INCURRED BY
FOX ROTHSCHILD LLP AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR THE PERIOD OF
SEPTEMBER 1, 2021 THROUGH SEPTEMBER 30, 2021**

Description	Amount
WESTLAW, RESEARCH 205	\$16.80
WESTLAW, RESEARCH 205	\$12.69
COURT FILINGS WELLS FARGO CREDIT CARD - Court Filing Fee	\$50.00
TOTAL EXPENSES	\$79.49

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AVADIM HEALTH, INC., *et al.*,¹

Debtors.

Chapter 11

Case No.: 21-10883 (CTG)

(Jointly Administered)

**Objection Deadline: November 29, 2021 at
4:00 p.m.**

**FOURTH MONTHLY FEE APPLICATION OF FOX ROTHSCHILD LLP FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD OF SEPTEMBER 1, 2021 THROUGH SEPTEMBER 30, 2021**

Fox Rothschild LLP (“Fox Rothschild”), as co-counsel to the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession (the “Debtors”), submits its Fourth Monthly Fee Application (the “Application”), pursuant to sections 330(a) and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and this Court’s Order (I) Establishing Procedures for Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief, entered June 28, 2021 (the “Interim Compensation Order”)² [D.I. 134], for (i) the allowance of interim compensation for professional services performed by Fox Rothschild for the Fourth

¹ The Debtors, along with the last four digits of each Debtor’s federal tax identification number are: Avadim Health, Inc. (8411); Avadim Health IP, Inc. (7594); Bionome Properties Corp. (6483); Quality Assurance Associates, Inc. (5613); and Relion Manufacturing, Inc. (0430). The Debtors’ business address is 81 Thompson Street, Asheville, NC 28803.

² Capitalized terms used herein but not capitalized shall have the meaning(s) ascribed to them in the Interim Compensation Order.

monthly application period from September 1, 2021 through September 30, 2021 (the “Compensation Period”) in the amount of \$45,037.00 (the “Monthly Compensation Amount”) incurred during the Fourth Compensation Period and reimbursement of expenses in the amount of \$79.49. In support of this Application, Fox Rothschild respectfully represents:

I. Jurisdiction

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. § 157(b)(2).
2. Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

II. Background

3. On May 31, 2021, the above-captioned debtors (the “Debtors”) filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Court”). No trustee has been appointed, and the Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

4. On June 9, 2021, the Office of the United States Trustee for the District of Delaware appointed the following three members to the Committee: (i) Berlin Packaging, LLC.; (ii) QSD, Inc.; and (iii) Donnelley Financial Solutions.

5. On June 10, 2021 (the “Retention Date”), the Committee selected Fox as its counsel.

6. By this Court’s Order Granting Application of the Official Committee of Unsecured Creditors Pursuant to 11 U.S.C. Section 1103(a) and Bankruptcy Rule 2014(a) for Authority to Employ and Retain Fox Rothschild LLP as Co-Counsel Effective as of

June 10, 2021, entered on July 14, 2020, the Committee was authorized to retain Fox Rothschild as their attorneys effective as of June 10, 2021 (the “Retention Order”) [D.I. 189]. The Retention Order authorizes the Debtors to compensate Fox Rothschild in accordance with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and such other procedures as were to be fixed by order of the Court. The Interim Compensation Order established such procedures.

7. On October 25, 2021, the Debtors and the Committee filed the *Second Amended Joint Combined Chapter 11 Plan of Liquidation and Disclosure Statement for AH Liquidation, Inc. and Certain Affiliate Debtors* [D.I. 380]. A hearing was held on final approval of the Disclosure Statement and confirmation of the Plan on October 27, 2021, and the parties are awaiting entry of the Order granting final approval of the Disclosure Statement and confirming the Plan.

8. Fox filed its First Monthly Application for Compensation and Reimbursement of Expenses for the Period June 10, 2021 through June 30, 2021 on July 20, 2021 [D.I. 226] the (“First Monthly Fee Application”), requesting (i) compensation in the amount of \$77,155.00 (the “First Monthly Compensation Amount”), and (ii) reimbursement of its actual and necessary expenses in the amount of \$161.03 (the “First Monthly Expense Amount”).

9. Fox filed a Certification of No Objection [D.I. 276] on August 25, 2021 with regard to the First Monthly Fee Application, and pursuant to the Interim Compensation Order was allowed fees in the amount of \$61,885.03 (80% of \$77,155.00) and expenses in the amount of \$161.03.

10. Fox filed its Second Monthly Application for Compensation and Reimbursement of Expenses for the Period July 1, 2021 through July 31, 2021 on August 27, 2021 [D.I. 287] the (“Second Monthly Fee Application”), requesting (i) compensation in the amount of \$36,534.50 (the “Second Monthly Compensation Amount”), and (ii) reimbursement of its actual and necessary expenses in the amount of \$126.24 (the “Second Monthly Expense Amount”).

11. Fox filed a Certification of No Objection [D.I. 318] on September 17, 2021 with regard to the Second Monthly Fee Application, and pursuant to the Interim Compensation Order was allowed fees in the amount of \$29,227.60 (80% of \$36,534.50) and expenses in the amount of \$126.24.

12. Fox filed its Third Monthly Application for Compensation and Reimbursement of Expenses for the Period August 1, 2021 through August 31, 2021 on September 20, 2021 [D.I. 320] the (“Third Monthly Fee Application”), requesting (i) compensation in the amount of \$40,747.50 (the “Third Monthly Compensation Amount”) (no expense reimbursement requested).

13. Fox filed a Certification of No Objection [D.I. 388] on October 26, 2021 with regard to the Third Monthly Fee Application, and pursuant to the Interim Compensation Order was allowed fees in the amount of \$32,598.00 (80% of \$40,747.50).

III. Summary of Application for the Compensation Period

14. By this Application, and in accordance with the Interim Compensation Order, Fox Rothschild requests approval of the Monthly Compensation Amount and the Monthly Expense Amount for the Compensation Period.

15. During the Compensation Period, Fox Rothschild performed the services

for which it is seeking compensation from the Debtors and their estates. Fox Rothschild received no payment and no promises of payment from any other source for services rendered, or to be rendered, in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Fox Rothschild and any other person, other than members of the firm, for the sharing of compensation received for services rendered in these cases.

16. Fox Rothschild maintains computerized records of the time spent by all Fox Rothschild attorneys and paraprofessionals in connection with its representation of the Committee. Fox Rothschild's invoice for the Compensation Period is attached hereto as Exhibit A.

17. Fox Rothschild seeks monthly allowance and payment, pursuant to Bankruptcy Code sections 330 and 331, of all fees and expenses incurred during the Compensation Period. The firm's total fees sought for the Compensation Period are \$45,037.00.

18. Fox Rothschild seeks reimbursement of expenses in the amount of \$79.49 for the Fourth Compensation Period as set forth in Exhibit B.

19. A description of the task codes used to categorize time spent by project category is attached as Exhibit C.

20. Pursuant to the Interim Compensation Order, absent an objection to the Application, 80% of the firm's fees, or \$36,029.60, is payable to Fox Rothschild.

A. Summary of Services Rendered by Fox Rothschild During the Compensation Period

21. This Application is the fourth monthly fee application for Interim Compensation that Fox Rothschild has filed in this case. During the Application Period,

Fox Rothschild provided the professional services that are set forth in the attached time records.

22. Attached as Exhibit A are Fox Rothschild's itemized time records for professionals and paraprofessionals performing services for the Committee during the Compensation Period.

23. During the Compensation Period, Fox Rothschild billed the Committee for time expended by attorneys and paraprofessionals based on hourly rates ranging from \$370 to \$755 per hour. The professional services performed by Fox Rothschild on behalf of the Committee during the Compensation Period required an aggregate expenditure of 74 recorded hours by Fox Rothschild's partners, associates, and paraprofessionals. Fox Rothschild's blended hourly rate for services provided during the Compensation Period is \$504.90.

24. The fees charged by Fox Rothschild as set forth in Exhibit A are billed in accordance with Fox Rothschild's existing billing rates and procedures in effect during the Compensation Period.

25. All entries itemized in Fox Rothschild's time records comply with the requirements set forth in Local Rule 2016-2, including, without limitation, (i) the utilization of project categories, (ii) a description of each activity or service that each individual performed, and (iii) the number of hours (in increments of one-Second of an hour) spent by each individual providing the services. Each project category in Exhibit A is organized in accordance with Fox Rothschild's internal system of project category or work codes (each a "Task Code"). If a Task Code does not appear, then Fox Rothschild did not bill time or expenses for that Task Code during the Compensation Period, but Fox Rothschild

may bill time for that Task Code in the future. In accordance with Local Rule 2016-2(d)(xi), all activity descriptions in Exhibit A are presented by task code and chronologically within each task code.

26. The professional services performed by Fox Rothschild were necessary and appropriate to the administration of these cases. The professional services performed by Fox Rothschild were in the best interests of the Committee and other parties in interest. Compensation for the foregoing services as requested is commensurate with the complexity, importance, and time-sensitive nature of the problems, issues, or tasks involved. The professional services were performed expeditiously and efficiently.

27. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount of fees requested is fair and reasonable given: (a) the complexity of the cases; (b) the time expended; (c) the nature and extent of the services rendered; (d) the value of such services; (e) Fox Rothschild's established expertise in the bankruptcy field; and (f) the costs of comparable services other than in a case under the Bankruptcy Code.

28. Undersigned counsel has reviewed the requirements of Local Rule 2016-2 and the Application complies with Local Rule 2016-2.

B. Actual and Necessary Expenses of Fox Rothschild

29. Pursuant to Local Rule 2016-2(e), attached as Exhibit B are Fox Rothschild's itemized records detailing expenses incurred on behalf of the Committee during the Compensation Period.

30. All entries detailed in Exhibit B comply with the requirements set forth in Local Rule 2016-2(e), including an itemization of the expenses by category, the date the expense was incurred, and the individual incurring the expense, where available. Fox

Rothschild has not requested for reimbursement of expenses related to overhead charges.

31. No expense reimbursement is sought for the Fourth Compensation Period (see Exhibit B).

C. The Requested Compensation Should be Allowed

32. The professional time expended by the firm, the value of said time in fees, and the value of the actual expenses incurred by the firm were actual, reasonable, and necessary. In all respects, the firm's fees and expenses meet the standards for allowance under Bankruptcy Code section 330, as well as the standards that govern the review and allowance of bankruptcy professionals' fees. See, e.g., In re Busy Beaver Bldg. Ctrs., Inc., 19 F.3d 833 (3d Cir. 1994).

33. Bankruptcy Code section 331 provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court's award of such compensation. See 11 U.S.C. § 331. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 1103 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered . . . and reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1)(A)(B). Bankruptcy Code section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded ... the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the

administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

(D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

34. Whenever possible, Fox Rothschild sought to minimize the costs of its services to the Committee by assigning tasks as appropriate to junior attorneys and paraprofessionals whose rates are lower. Fox Rothschild's delegation as such has resulted in a desirable blended rate for its timekeepers.

35. Moreover, professionals in the firm's commercial bankruptcy and restructuring practice area rendered the vast majority of the services performed by Fox Rothschild. In so doing, Fox Rothschild brought to bear the utmost in relevant experience for the Committee and the Debtors' estates.

36. In sum, the services rendered by Fox Rothschild were necessary and beneficial to the Committee and the Debtors' estates and were performed in a timely manner commensurate with the complexity, importance, and nature of the issues involved. Accordingly, approval of the compensation for professional services and reimbursement of expenses sought herein is warranted.

D. Reservation

37. To the extent time or disbursement charges for services rendered or disbursements incurred relate to the Compensation Period but were not processed prior to the preparation of this Application, or Fox Rothschild has for any other reason not sought compensation or reimbursement of expenses herein with respect to any services rendered or expenses incurred during the Compensation Period, Fox Rothschild reserves the right to request additional compensation for such services and reimbursement of such expenses in a future application.

IV. Notice

38. Notice of this Application will be served upon: (i) the Debtors, c/o Carl Marks Advisory Group LLC, 900 Fourth Avenue, 33rd Floor, New York, NY 10022, Attn: Keith Daniels (kdaniels@carlmarks.com); (ii) counsel for the Debtors, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, De 19801 (Attn: Laura Davis Jones, Esq. ljones@pszjlaw.com and Timothy P. Cairns, Esq. tcairns@pszjlaw.com) and Chapman and Cutler LLP, 1270 Avenue of the Americas, New York, NY 10020 (Larry G. Halperin halperin@chapman.com and Joon P. Hong (joonhong@chapmen.com); (iii) counsel to the DIP Agent and Administrative Agent, Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153 (Attn: David N. Giffiths David.giffiths@weil.com and Bryan R. Podzius bryan.podzius@weil.com) and Richards Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, DE 19801 (Attn: Zachary I Shapiro shapiro@rlf.com); and (iv) Office of the United States Trustee, District of Delaware, 844 N. King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Richard L. Schepacarter richard.schepacarter@usdoj.gov).

V. Conclusion

WHEREFORE, Fox Rothschild respectfully requests that an interim allowance be made for professional services rendered during the Compensation Period in the amount of \$45,037.00 for services rendered and \$79.49 as reimbursement of costs expended during the period September 1, 2021 through September 30, 2021, and that the Court enter an order: (i) allowing such compensation for professional services rendered and reimbursement of actual and necessary expenses incurred without prejudice to Fox Rothschild's right to seek additional compensation for services performed and expenses incurred during the Compensation Period, which were not processed at the time of this Application, (ii) authorizing payment by the Debtors for services rendered during the Fee Period in the amount of \$36,029.60 (80% of \$45,037.00) and reimbursement of costs in the amount of \$79.49; and (iii) granting Fox Rothschild such other and further relief as is just and proper.

Dated: November 4, 2021

FOX ROTHSCHILD LLP

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-and-

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*Counsel to the Official Committee of
Unsecured Creditors*

Exhibit A



Fox Rothschild LLP
ATTORNEYS AT LAW

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TAX I.D. NO. 23-1404723

OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF AH LIQUIDATION, INC.

Invoice Number 2839900
Invoice Date 10/13/21
Client Number 340136
Matter Number 00001

RE: AVADIM HEALTH, INC.

FOR PROFESSIONAL SERVICES RENDERED THROUGH 09/30/21:

Date	Timekeeper	Task	Description	Hours	Amount
09/02/21	NIEDERMAN	1	CONFER WITH CO-COUNSEL AND COUNSEL FOR PLAN PROPONENTS RE SUBMISSION OF PLAN RELATED PLEADINGS AND CONFER WITH OFFICE OF UST RE SAME	0.4	\$226.00
09/03/21	NIEDERMAN	1	REVIEW UST INQUIRY RE TIMING ON PLAN PROCEDURES AND REVIEW OF FOLLOW UP CORRESPONDENCE TO COUNSEL FOR DEBTORS RE SAME AND RE STATUS OF TAX ANALYSIS	0.3	\$169.50
09/07/21	GOUVEIA	1	EMAIL CORRESPONDENCE WITH E. CHAFETZ AND PROVINCE REGARDING STATUS UPDATE TO COMMITTEE MEMBERS IN LIEU OF MEETING TOMORROW.	0.2	\$110.00
09/07/21	GREEN	1	DISTRIBUTE RECENTLY FILED PLEADINGS.	0.1	\$25.00
09/07/21	NIEDERMAN	1	REVIEW CARDINAL HEALTH MOTION FOR PAYMENT OF ADMIN CLAIM	0.2	\$113.00
09/07/21	NIEDERMAN	1	REVIEW STATUS OF REQUEST FOR SHORTENED NOTICE AND SCHEDULING OF HEARING ON PRELIMINARY APPROVAL OF PLAN AND DISCLOSURE STATEMENT AS WELL AS SOLICITATION	0.5	\$282.50

Date	Timekeeper	Task	Description	Hours	Amount
			PROCEDURES AND NUMEROUS CORRESPONDENCE WITH CO- COUNSEL, PLAN PROponents AND CHAMBERS RE SAME		
09/07/21	NIEDERMAN	1	REVIEW OF 9/9 HEARING ON MOTION FOR LIMITED STAY RELIEF, CONFER WITH CO- COUNSEL RE STRATEGY CONCERNING SAME AND REVIEW OF AGENDA RE OMNIBUS HEARING	0.4	\$226.00
09/07/21	NIEDERMAN	1	REVIEW OF ORDER SHORTENING NOTICE ON SOLICITATION PROCEDURES AND CONFER WITH CHAMBERS AND CO- COUNSEL RE SCHEDULING ON YOM KIPPUR	0.3	\$169.50
09/08/21	GOUVEIA	1	EMAIL CORRESPONDENCE WITH COURT STAFF AND COUNSEL FOR UST, DEBTORS AND CO-COUNSEL REGARDING HEARING DATE FOR CONDITIONAL APPROVAL OF DISCLOSURE STATEMENT.	0.2	\$110.00
09/08/21	GREEN	1	CALENDAR HEARING DATE.	0.1	\$25.00
09/16/21	NIEDERMAN	1	REVIEW DRAFT OF NOTICE OF AGENDA FOR HEARING SCHEDULED FOR SEPTEMBER 21, 2021 AT 2:00 P.M. AND CONFER WITH CO- COUNSEL AND COUNSEL FOR DEBTORS RE SAME	0.2	\$113.00
09/17/21	GOUVEIA	1	EMAIL CORRESPONDENCE WITH R. SOLOMON REGARDING REGISTRATION FOR SEPTEMBER 21 HEARING.	0.1	\$55.00
09/17/21	NIEDERMAN	1	REVIEW AGENDA OF MATTERS SCHEDULED FOR HEARING ON 9/21	0.1	\$56.50
09/17/21	SOLOMON	1	REVIEW NOTICE OF AGENDA AND CIRCULATE	0.2	\$83.00
09/17/21	SOLOMON	1	REGISTER S. NIEDERMAN/G. GOUVEIA FOR CONFIRMATION HEARING	0.2	\$83.00
09/20/21	GREEN	1	PREPARE AND FILE COMMITTEE SUPPORT LETTER.	0.5	\$125.00
09/20/21	NIEDERMAN	1	REVIEW OF	0.2	\$113.00

Date	Timekeeper	Task	Description	Hours	Amount
			CORRESPONDENCE AMONG COUNSEL FOR PLAN PROPONENTS AND ADVISORS RE LIQUIDATION ANALYSIS AND GUC RECOVERY		
09/21/21	GREEN	1	PREPARE AND FILE NOTICES REGARDING PLAN AND PLAN PROCEDURES ORDER.	0.5	\$125.00
09/21/21	NIEDERMAN	1	REVIEW UST COMMENTS ON PROCEDURES ORDER AND INCORPORATE SAME INTO VERSION TO BE FILED	0.2	\$113.00
09/22/21	GREEN	1	PREPARE AND FILE NOTICES REGARDING PLAN AND PLAN PROCEDURES ORDER.	0.5	\$125.00
09/23/21	GREEN	1	PREPARE AND FILE NOTICE OF FILING REGARDING SOLICITATION VERSIONS OF PLAN AND DS (.3); CORRESPOND WITH TEAM REGARDING SAME (.2).	0.5	\$125.00
09/27/21	SOLOMON	1	DISTRIBUTE NOTICE OF AGENDA/REGISTER TEAM FOR HEARING	0.2	\$83.00
09/28/21	GOUVEIA	1	REVIEW ENTERED ORDER EXTENDING REMOVAL DEADLINE.	0.1	\$55.00
09/28/21	NIEDERMAN	1	REVIEW AND COMMENT ON DRAFT STIPULATION MODIFYING THE AUTOMATIC STAY MODIFYING THE AUTOMATIC STAY TO RESUME STATE COURT PROCEEDINGS TO LIQUIDATE COUNTERCLAIMS	0.2	\$113.00
09/29/21	GOUVEIA	1	REVIEW AMENDED AGENDA CANCELING HEARING.	0.1	\$55.00
09/29/21	NIEDERMAN	1	REVIEW AMENDED NOTICE OF AGENDA RE CANCELLATION OF OMNIBUS HEARING AND CORRESPONDENCE WITH COUNSEL FOR DEBTORS AND CHG RE SAME	0.2	\$113.00
09/30/21	NIEDERMAN	1	REVIEW MONTHLY OPERATING REPORTS SUBMITTED BY DEBTORS	0.2	\$113.00
09/01/21	WIDMAN	3	REVIEWED CHG SETTLEMENT OFFER (.3); PHONE CALL WITH FOX TEAM AND E. CHAFETZ RE: RESPONDING TO SAME (.6)	0.9	\$535.50

Date	Timekeeper	Task	Description	Hours	Amount
09/08/21	GOUVEIA	3	EMAIL CORRESPONDENCE WITH PROVINCE REGARDING STATUS OF CARDINAL HEALTH ADMINISTRATIVE CLAIM.	0.1	\$55.00
09/09/21	NIEDERMAN	3	RESEARCH REGARDING PRIORITY OF COVERAGE RELATED TO COMPETING CLAIMS AGAINST D&O POLICY	0.6	\$339.00
09/13/21	GOUVEIA	3	EMAIL CORRESPONDENCE WITH H. FOARD REGARDING STATUS OF CARDINAL HEALTH CURE AND ADMIN CLAIMS (.1); EMAIL CORRESPONDENCE WITH COUNSEL FOR DEBTORS AND HAYFIN REGARDING SAME (.1).	0.2	\$110.00
09/13/21	WIDMAN	3	DRAFTED D&O COMPLAINT AGAINST S. WOODY	2.0	\$1,190.00
09/20/21	GOUVEIA	3	REVIEW EMAIL CORRESPONDENCE AND SPREADSHEET FROM PROVINCE REGARDING STATUS OF CLAIMS REVIEW AND RECONCILIATION AND POTENTIAL CLAIM OBJECTIONS.	0.2	\$110.00
09/21/21	GOUVEIA	3	REVIEW NOTICE OF WITHDRAWAL OF CARDINAL HEALTH MOTION TO ALLOW ADMINISTRATIVE CLAIM (.1); EMAIL CORRESPONDENCE WITH CO-COUNSEL AND PROVINCE REGARDING SAME AND CALL TO DISCUSS STATUS OF CLAIMS RECONCILIATION PROCESS (.1).	0.2	\$110.00
09/23/21	WIDMAN	3	PHONE CALL W/COUNSEL FOR CHG RE: SETTLEMENT OF MOTION FOR RELIEF FROM STAY (.3); CORRESPONDENCE W/G. GOUVEIA RE: SAME (.2)	0.5	\$297.50
09/27/21	NIEDERMAN	3	REVIEW CORRESPONDENCE CONFIRMING CARVE-OUT OF THE INITIAL LENDER RECOVERY TO FUND COMMITTEE'S CLAIM ADMINISTRATION	0.2	\$113.00
09/28/21	NIEDERMAN	3	REVIEW CORRESPONDENCE FROM LENDERS RE APPROVED FEES FOR CLAIMS	0.1	\$56.50

Date	Timekeeper	Task	Description	Hours	Amount
			ADMIN		
09/21/21	NIEDERMAN	9	REVIEW OF COMMUNITY HEALTH GROUP RESPONSE TO SETTLEMENT OFFER	0.2	\$113.00
09/01/21	NIEDERMAN	11	CONFER WITH CO-COUNSEL AND PLAN PROPONENTS RE STATUS AND STRATEGY CONCERNING ANTICIPATED PLAN FILINGS	0.2	\$113.00
09/02/21	GOUVEIA	11	EMAIL CORRESPONDENCE WITH S. NIEDERMAN AND E. CHAFETZ REGARDING PLAN SOLICITATION MOTION AND RELATED ISSUES.	0.2	\$110.00
09/02/21	NIEDERMAN	11	REVIEW CURRENT DRAFT OF JOINT MOTION OF THE DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER (A) GRANTING INTERIM APPROVAL OF THE JOINT COMBINED PLAN OF LIQUIDATION AND DISCLOSURE STATEMENT, (B) GRANTING APPROVAL OF PROCEDURES FOR THE SOLICITATION AND TABULATION OF VOTES TO ACCEPT OR REJECT THE COMBINED PLAN AND DISCLOSURE STATEMENT, (C) SCHEDULING THE COMBINED HEARING ON FINAL APPROVAL OF THE ADEQUACY OF DISCLOSURE STATEMENT AND CONFIRMATION OF THE PLAN, (D) APPROVING THE FORM OF BALLOTS AND SOLICITATION PACKAGE, (E) APPROVING THE NOTICE PROVISIONS, AND (F) GRANTING RELATED RELIEF ALONG WITH DRAFT EXHIBITS THERETO	0.5	\$282.50
09/02/21	NIEDERMAN	11	REVIEW CURRENT DRAFT OF PROPOSED ORDER (A) GRANTING INTERIM APPROVAL OF THE JOINT COMBINED PLAN OF LIQUIDATION AND DISCLOSURE STATEMENT, (B) GRANTING APPROVAL OF PROCEDURES FOR THE SOLICITATION AND TABULATION OF VOTES TO ACCEPT OR REJECT THE	0.2	\$113.00

Date	Timekeeper	Task	Description	Hours	Amount
			JOINT COMBINED PLAN AND DISCLOSURE STATEMENT, (C) SCHEDULING THE COMBINED HEARING ON FINAL APPROVAL OF THE ADEQUACY OF DISCLOSURE STATEMENT AND CONFIRMATION OF THE PLAN, (D) APPROVING THE FORM OF BALLOTS AND SOLICITATION PACKAGE, (E) APPROVING THE NOTICE PROVISIONS, AND (F) GRANTING RELATED RELIEF		
09/02/21	NIEDERMAN	11	REVIEW CURRENT DRAFT OF JOINT COMBINED CHAPTER 11 PLAN OF LIQUIDATION AND DISCLOSURE STATEMENT FOR AH LIQUIDATION, INC. AND CERTAIN AFFILIATE DEBTORS	0.3	\$169.50
09/03/21	GOUVEIA	11	EMAIL CORRESPONDENCE WITH S. NIEDERMAN AND LOWENSTEIN ATTORNEYS REGARDING PLAN SOLICITATION PROCEDURES MOTION AND HEARING DATE BASED ON FEEDBACK FROM UST.	0.2	\$110.00
09/03/21	NIEDERMAN	11	REVIEW REVISED DRAFTS OF SOLICITATION MOTION, PLAN PROCEDURES ORDER, SOLICITATION EXHIBITS, MOTION TO SHORTEN, AND COMBINED PLAN/DS	0.3	\$169.50
09/03/21	NIEDERMAN	11	REVIEW DEBTORS REVISIONS TO PLAN/DISCLOSURE STATEMENT TO ACCOUNT FOR TAX CONSIDERATIONS	0.2	\$113.00
09/03/21	NIEDERMAN	11	REVIEW AND COMMENT ON FINALIZING AND FILING OF SOLICITATION MOTION, PLAN PROCEDURES ORDER, SOLICITATION EXHIBITS, MOTION TO SHORTEN TIME, AND JOINT COMBINED PLAN AND DISCLOSURE STATEMENT	0.5	\$282.50
09/03/21	SOLOMON	11	MULTIPLE EMAILS WITH ERICA MANNIX, GORDON GOUVEIA AND SETH NIEDERMAN RE: FILING OF COMBINED PLAN, D/S, SOLICITATION MOTION AND MOTION TO SHORTEN	0.2	\$83.00

Date	Timekeeper	Task	Description	Hours	Amount
09/03/21	SOLOMON	11	REVISE COMBINED PLAN/DS, SOLICITATION MOTION AND MOTION TO SHORTEN AND FILE SAME	1.0	\$415.00
09/03/21	SOLOMON	11	EMAIL TO OMNI RE: SERVICE OF PLAN/DS, SOLICITATION MOTION, ETC.	0.2	\$83.00
09/07/21	GOUVEIA	11	REVIEW ENTERED ORDER GRANTING MOTION TO SHORTEN NOTICE ON SOLICITATION PROCEDURES MOTION (.1) AND EMAIL CORRESPONDENCE WITH CO-COUNSEL REGARDING SAME (.1).	0.2	\$110.00
09/07/21	STEEN	11	COMMUNICATIONS WITH OMNI REGARDING SERVICE OF ORDER SHORTENING TIME AND SOLICITATION MOTION.	0.1	\$38.00
09/08/21	GOUVEIA	11	EMAIL CORRESPONDENCE WITH J. CANECO REGARDING PREPARATION OF LIQUIDATING TRUST AGREEMENT.	0.2	\$110.00
09/08/21	NIEDERMAN	11	REVIEW SOLICITATION MOTION AND SCHEDULING RE SAME AND CONFER WITH CO-COUNSEL AND CHAMBERS RE SAME	0.4	\$226.00
09/08/21	NIEDERMAN	11	REVIEW ORDER RESCHEDULING HEARING ON SOLICITATION MOTION	0.3	\$169.50
09/09/21	CANECO	11	DRAFTING LIQUIDATING TRUST AGREEMENT	1.4	\$616.00
09/10/21	CANECO	11	DRAFTING LIQUIDATING TRUST AGREEMENT	1.1	\$484.00
09/15/21	CANECO	11	DRAFTING LIQUIDATING TRUST AGREEMENT	2.8	\$1,232.00
09/16/21	CANECO	11	DRAFTING AND REVISING LIQUIDATING TRUST AGREEMENT	0.4	\$176.00
09/16/21	GOUVEIA	11	REVIEW EMAIL FROM US TRUSTEE REGARDING INITIAL COMMENTS AND CONCERNS WITH RESPECT TO THE COMBINED PLAN AND DISCLOSURE STATEMENT AND SOLICITATION PROCEDURES MOTION.	0.1	\$55.00
09/16/21	NIEDERMAN	11	REVIEW UST COMMENTS ON THE COMBINED PLAN AND	0.3	\$169.50

Date	Timekeeper	Task	Description	Hours	Amount
			DISCLOSURE STATEMENT AND ATTENDANT MOTION		
09/18/21	CANECO	11	REVIEW AND INCORPORATE COMMENTS TO LIQUIDATING TRUST AGREEMENT FROM G. GOUVEIA AND SEND SAME TO CO-COUNSEL	0.5	\$220.00
09/18/21	GOUVEIA	11	REVIEW DRAFT RESPONSES TO UST COMMENTS ON COMBINED DISCLOSURE STATEMENT AND PLAN FROM CO-COUNSEL (.2); REVIEW AND EDIT DRAFT LIQUIDATING TRUST AGREEMENT (.8); EMAIL CORRESPONDENCE WITH J. CANECO REGARDING SAME (.1).	1.1	\$605.00
09/20/21	GOUVEIA	11	REVIEW DRAFT COMMITTEE SUPPORT LETTER (.1) AND EMAIL CORRESPONDENCE WITH CO-COUNSEL REGARDING SAME (.1).	0.2	\$110.00
09/20/21	NIEDERMAN	11	REVIEW PLAN PROPONENTS 'RESPONSE TO THE UST REGARDING HIS COMMENTS TO THE COMBINED PLAN AND DISCLOSURE STATEMENT	0.2	\$113.00
09/20/21	NIEDERMAN	11	REVIEW AND ATTENTION TO FILING OF NOTICE OF FILING OF LETTER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS IN SUPPORT OF JOINT COMBINED CHAPTER 11 PLAN OF LIQUIDATION AND DISCLOSURE STATEMENT FOR AH LIQUIDATION, INC. AND CERTAIN AFFILIATE DEBTORS	0.2	\$113.00
09/20/21	NIEDERMAN	11	REVIEW OF DRAFT COMMITTEE SUPPORT LETTER AND CONFER WITH CO-COUNSEL RE SAME	0.2	\$113.00
09/20/21	SLATER	11	DRAFT NOTICE FOR COMMITTEE LETTER IN SUPPORT OF PLAN	0.5	\$177.50
09/20/21	SLATER	11	PHONE CONFERENCE WITH E. MANNIX (0.1) AND S. GREEN (0.1) RE FILING OF NOTICE RE COMMITTEE SUPPORT LETTER	0.2	\$71.00
09/21/21	GOUVEIA	11	EMAIL CORRESPONDENCE WITH CO-COUNSEL	0.1	\$55.00

Date	Timekeeper	Task	Description	Hours	Amount
			REGARDING AMENDED PLAN DOCUMENTS AND PREPARATION FOR TODAY'S HEARING.		
09/21/21	NIEDERMAN	11	REVIEW OF REVISED: (1) COMBINED PLAN AND DISCLOSURE STATEMENT; (2) PLAN PROCEDURES ORDER; AND (2) EXHIBITS TO THE PLAN PROCEDURES ORDER	0.4	\$226.00
09/21/21	NIEDERMAN	11	REVIEW AND COMMENT ON CERTIFICATION OF COUNSEL REGARDING ORDER (A) GRANTING INTERIM APPROVAL OF THE AMENDED JOINT COMBINED PLAN OF LIQUIDATION AND DISCLOSURE STATEMENT, (B) GRANTING APPROVAL OF PROCEDURES FOR THE SOLICITATION AND TABULATION OF VOTES TO ACCEPT OR REJECT THE JOINT COMBINED PLAN AND DISCLOSURE STATEMENT, (C) SCHEDULING THE COMBINED HEARING ON FINAL APPROVAL OF THE ADEQUACY OF DISCLOSURE STATEMENT AND CONFIRMATION OF THE PLAN; (D) APPROVING THE FORM OF BALLOTS AND SOLICITATION PACKAGE, (E) APPROVING THE NOTICE PROVISIONS, AND (F) GRANTING RELATED RELIEF	0.2	\$113.00
09/21/21	NIEDERMAN	11	REVIEW NOTICE OF FILING OF AMENDED JOINT COMBINED CHAPTER 11 PLAN OF LIQUIDATION AND DISCLOSURE STATEMENT FOR AH LIQUIDATION, INC. AND CERTAIN AFFILIATE DEBTORS	0.2	\$113.00
09/21/21	NIEDERMAN	11	EMAIL CORRESPONDENCE WITH FOX TEAM REGARDING PREPARATION OF NOTICES RE REVISED PLAN AND DISCLOSURE STATEMENT; PLAN PROCEDURES ORDER; AND) EXHIBITS TO THE PLAN PROCEDURES ORDER	0.3	\$169.50
09/21/21	SLATER	11	REVIEW NOTICE PREPARED BY S. GREEN RE AMENDED PLAN AND DISCLOSURE	0.2	\$71.00

Date	Timekeeper	Task	Description	Hours	Amount
			STATEMENT		
09/22/21	NIEDERMAN	11	REVIEW STATUS OF ENTRY OF SOLICITATION PROCEDURES ORDER AND FOLLOW UP WITH CO-COUNSEL AND CHAMBERS RE SAME	0.3	\$169.50
09/23/21	GOUVEIA	11	REVIEW ENTERED SOLICITATION PROCEDURES ORDER.	0.2	\$110.00
09/23/21	NIEDERMAN	11	REVIEW ENTERED SOLICITATION ORDER AND FILING/SERVICE OF THE SOLICITATION VERSION OF THE COMBINED PLAN AND DISCLOSURE STATEMENT ALONG WITH NOTICE OF FILING OF SOLICITATION VERSION OF AMENDED JOINT COMBINED CHAPTER 11 PLAN OF LIQUIDATION AND DISCLOSURE STATEMENT FOR AH LIQUIDATION, INC. AND CERTAIN AFFILIATE DEBTORS	0.2	\$113.00
09/28/21	GOUVEIA	11	EMAIL CORRESPONDENCE WITH HAYFIN COUNSEL AND CO-COUNSEL REGARDING STATUS OF DRAFT LIQUIDATING TRUST AGREEMENT.	0.1	\$55.00
09/28/21	NIEDERMAN	11	REVIEW INQUIRY FROM LENDERS RE STATUS OF THE LIQUIDATING TRUST AGREEMENT	0.1	\$56.50
09/29/21	CANECO	11	REVIEWING CO-COUNSEL COMMENTS TO LIQUIDATING TRUST AGREEMENT	0.8	\$352.00
09/29/21	GOUVEIA	11	REVIEW CO-COUNSEL COMMENTS ON DRAFT LIQUIDATING TRUST AGREEMENT (.2); EMAIL CORRESPONDENCE WITH J. CANECO REGARDING SAME (.1).	0.3	\$165.00
09/29/21	NIEDERMAN	11	REVIEW OF DRAFT LIQUIDATING TRUST AGREEMENT AND CORRESPONDENCE WITH COUNSEL FOR DEBTORS/LENDERS RE SAME	0.4	\$226.00
09/29/21	SOLOMON	11	CALENDAR ALL DATES/HEARINGS RELEVANT	0.5	\$207.50

Date	Timekeeper	Task	Description	Hours	Amount
			TO CONFIRMATION AND EFFECTIVE DATE		
09/30/21	CANECO	11	REVIEWING LIQUIDATING TRUST AGREEMENT AND COMMENTS OF CO-COUNSEL; PROVIDE COMMENTS TO SAME AND NOTES TO G. GOUVEIA	2.1	\$924.00
09/07/21	GOUVEIA	14	EMAIL CORRESPONDENCE WITH S. KIETLINSKI AND FOX TEAM REGARDING PROVINCE SECOND MONTHLY FEE APPLICATION.	0.2	\$110.00
09/08/21	GOUVEIA	14	REVIEW AND EDIT DRAFT PROVINCE SECOND MONTHLY FEE APPLICATION AND NOTICE (.1); EMAIL CORRESPONDENCE WITH S. GREEN AND S. NIEDERMAN REGARDING SAME (.1).	0.2	\$110.00
09/08/21	GREEN	14	PREPARE, FILE AND SERVE PROVINCE FEE APPLICATION.	0.5	\$125.00
09/08/21	NIEDERMAN	14	REVIEW SECOND MONTHLY FEE APPLICATION OF PROVINCE LLC FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD OF JULY 1, 2021 THROUGH JULY 31, 2021	0.2	\$113.00
09/16/21	GOUVEIA	14	EMAIL CORRESPONDENCE WITH CO-COUNSEL REGARDING STATUS OF JULY MONTHLY FEE APPLICATIONS AND CERTIFICATES OF NO OBJECTION.	0.1	\$55.00
09/17/21	GOUVEIA	14	REVIEW AND EDIT CNOS FOR FOX AND LOWENSTEIN SECOND MONTHLY FEE APPLICATIONS (.2); EMAIL CORRESPONDENCE WITH R. SOLOMON REGARDING SAME (.1).	0.3	\$165.00
09/17/21	GREEN	14	PREPARE AUGUST MONTHLY FEE APPLICATION.	1.0	\$250.00
09/17/21	NIEDERMAN	14	REVIEW AND APPROVE CNOS RE COMMITTEE PROFESSIONALS FEE APPS	0.2	\$113.00
09/17/21	SOLOMON	14	DRAFT AND FILE FOX/LOWENSTEIN CNOS (2ND	0.4	\$166.00

Date	Timekeeper	Task	Description	Hours	Amount
			MONTHLY FEE APPLICATIONS)		
09/20/21	GOUVEIA	14	REVIEW PROVINCE THIRD MONTHLY FEE APPLICATION (.1); EMAIL CORRESPONDENCE WITH S. GREEN REGARDING SAME (.1).	0.2	\$110.00
09/20/21	GOUVEIA	14	REVIEW PEDIGO LAW FIRM FEE APPLICATION (.1); EMAIL CORRESPONDENCE WITH E. CHAFETZ REGARDING SAME (.1).	0.2	\$110.00
09/20/21	GREEN	14	PREPARE, FILE AND SERVE FOX FEE APPLICATION (.4); PREPARE PROVINCE FEE APPLICATION (.3)	0.7	\$175.00
09/21/21	SOLOMON	14	PREPARE/FILE PROVINCE'S 3RD MONTHLY FEE APPLICATION AND SERVE ON NOTICE PARTIES	0.5	\$207.50
09/22/21	SOLOMON	14	REVIEW/REVISE LOWENSTEIN'S 3RD MONTHLY FEE APPLICATION	0.3	\$124.50
09/22/21	SOLOMON	14	DRAFT NOTICE OF LOWENSTEIN'S 3RD MONTHLY FEE APPLICATION	0.3	\$124.50
09/24/21	GOUVEIA	14	REVIEW THIRD MONTHLY APPLICATION OF CHAPMAN AND CUTLER LLP AS CO-COUNSEL FOR THE DEBTORS AND DEBTORS-IN-POSSESSION FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM AUGUST 1, 2021 THROUGH AND INCLUDING AUGUST 31, 2021	0.1	\$55.00
09/27/21	GOUVEIA	14	REVIEW AND EDIT LOWENSTEIN THIRD MONTHLY FEE APPLICATION (.1); EMAIL CORRESPONDENCE WITH R. SOLOMON AND S. NIEDERMAN REGARDING SAME (.1).	0.2	\$110.00
09/27/21	NIEDERMAN	14	REVIEW THIRD MONTHLY FEE APPLICATION OF LOWENSTEIN SANDLER LLP	0.2	\$113.00
09/27/21	SOLOMON	14	PREPARE AND FILE LOWENSTEIN'S 3RD	0.5	\$207.50

Date	Timekeeper	Task	Description	Hours	Amount
			MONTHLY FEE STATEMENT		
09/27/21	SOLOMON	14	EMAIL TO NOTICE PARTIES TRANSMITTING LOWENSTEIN FEE APPLICATION	0.2	\$83.00
09/14/21	NIEDERMAN	18	REVIEW SETTLEMENT OFFER RECEIVED RE NC ACTION AND CONSIDER COUNTERPROPOSAL IN TERMS OF ACCESS TO INSURANCE PROCEEDS	0.2	\$113.00
09/01/21	GOUVEIA	21	EMAIL CORRESPONDENCE WITH PROVINCE AND CO-COUNSEL IN PREPARATION FOR TODAY'S COMMITTEE MEETING (.1); REVIEW OF PROVINCE FINANCIAL UPDATE MATERIALS (.1); FINALIZE AND SEND AGENDA AND PROVINCE MATERIALS TO COMMITTEE MEMBERS (.1); PREPARE FOR (.1) AND ATTEND (.4) WEEKLY COMMITTEE MEETING.	0.8	\$440.00
09/07/21	GOUVEIA	21	DRAFT STATUS UPDATE EMAIL TO COMMITTEE AND CANCEL WEEKLY COMMITTEE MEETING.	0.2	\$110.00
09/15/21	GOUVEIA	21	EMAIL CORRESPONDENCE WITH COMMITTEE MEMBERS AND COUNSEL REGARDING STATUS UPDATE AND CHG SETTLEMENT PROPOSAL.	0.3	\$165.00
09/29/21	GOUVEIA	21	EMAIL CORRESPONDENCE WITH CO-COUNSEL AND PROVINCE REGARDING INFORMATION FOR UPDATE IN LIEU OF COMMITTEE MEETING TODAY (.2); DRAFT/SEND EMAIL UPDATE TO COMMITTEE MEMBERS AND COUNSEL (.2).	0.4	\$220.00
09/01/21	NIEDERMAN	22	REVIEW CREDITOR INQUIRY RE STATUS OF CLAIM	0.2	\$113.00
09/07/21	STEEN	23	REGISTER ATTORNEYS FOR UPCOMING HEARING ON STAY MOTION VIA ZOOM.	0.2	\$76.00
09/09/21	CANECO	23	APPEARANCE AND ARGUMENT FOR HEARING ON LIMITED STAY RELIEF	0.9	\$396.00
09/09/21	GOUVEIA	23	ATTEND CONTINUED PRELIMINARY HEARING ON CHG STAY RELIEF MOTION.	0.8	\$440.00

Date	Timekeeper	Task	Description	Hours	Amount
09/09/21	NIEDERMAN	23	ATTEND OMNIBUS HEARING	0.8	\$452.00
09/21/21	GOUVEIA	23	ATTEND ZOOM HEARING ON CONDITIONAL APPROVAL OF DISCLOSURE STATEMENT AND PLAN SOLICITATION PROCEDURES.	0.5	\$275.00
09/21/21	NIEDERMAN	23	ATTEND ZOOM HEARING ON CONDITIONAL APPROVAL OF DISCLOSURE STATEMENT AND PLAN SOLICITATION PROCEDURES.	0.5	\$282.50
09/14/21	WIDMAN	24	DRAFTED COMPLAINT FOR BREACH OF FIDUCIARY DUTY AGAINST S. WOODY	2.0	\$1,190.00
09/01/21	CANECO	28	CONFERENCE WITH E. CHAFETZ, G. GOUVEIA, S. NIEDERMAN, J. WIDMAN RE: PROPOSAL FROM CHG COUNSEL, PLAN FOR HEARING	0.6	\$264.00
09/01/21	CANECO	28	REVIEW EMAIL CORRESPONDENCE WITH DEBTORS' COUNSEL AND LENDER'S COUNSEL RE: STAY MOTION, INSURANCE ISSUES.	0.3	\$132.00
09/01/21	GOUVEIA	28	REVIEW COMMUNITY HEALTH GROUP FILED PROOFS OF CLAIM (.3); EMAIL CORRESPONDENCE (.1) AND CONFERENCE CALL WITH FOX TEAM AND E. CHAFETZ REGARDING CHG SETTLEMENT PROPOSAL AND RELATED ISSUES (0.6)	1.0	\$550.00
09/01/21	NIEDERMAN	28	REVIEW CHG CLAIMS FILING	0.2	\$113.00
09/01/21	NIEDERMAN	28	REVIEW OF INSURANCE INQUIRY TO DEBTORS RELATED TO STAY RELIEF MOTION AS WELL AS ANALYSIS OF D&O POLICY TERMS AND LIMITS	0.1	\$56.50
09/01/21	NIEDERMAN	28	TELEPHONE CONFERENCE WITH E. CHAFETZ, G. GOUVEIA, J. CANECO, AND J. WIDMAN RE CHG SETTLEMENT PROPOSAL AND RELATED ISSUES	0.6	\$339.00
09/02/21	GOUVEIA	28	EMAIL CORRESPONDENCE WITH DEBTORS' COUNSEL REGARDING STATUS OF INSURANCE INQUIRY AND PROPOSED CALL WITH NC	0.2	\$110.00

Date	Timekeeper	Task	Description	Hours	Amount
			COUNSEL.		
09/02/21	NIEDERMAN	28	REVIEW OF UPDATE FROM COUNSEL FOR DEBTORS RE INQUIRY TO INSURANCE COUNSEL IN CONNECTION WITH STAY RELIEF MOTION AND BILL TO ESTATE RE SAME AND REVIEW CORRESPONDENCE RE CALL TO DISCUSS STATUS OF NC CASE	0.3	\$169.50
09/03/21	GOUVEIA	28	CONFERENCE CALL WITH NC COUNSEL REGARDING STATUS OF CHG LAWSUIT AND RELATED ISSUES (.7); REVIEW INSURANCE POLICY (.1); FOLLOW UP PHONE CALL WITH J. WIDMAN REGARDING NEXT STEPS RE CHG SETTLEMENT OFFER AND PREPARATION FOR PRELIMINARY HEARING (.3); PHONE CALL WITH HAYFIN COUNSEL REGARDING CHG SETTLEMENT OFFER AND RELATED ISSUES (.3); FOLLOW UP EMAIL TO J. WIDMAN REGARDING SAME (.1)	1.5	\$825.00
09/03/21	NIEDERMAN	28	REVIEW EMAIL CORRESPONDENCE WITH CO-COUNSEL RE SCHEDULING SOLICITATION MOTION AND CONFER WITH CO-COUNSEL, COUNSEL FOR PLAN PROPONENTS, UST AND CHAMBERS RE SAME	0.3	\$169.50
09/03/21	NIEDERMAN	28	ATTEND CONFERENCE CALL WITH N.C. COUNSEL FOR DEBTORS RE STATUS AND REQUESTED STAY RELIEF	0.7	\$395.50
09/03/21	WIDMAN	28	PHONE CALL W/ G. GOUVEIA RE: STRATEGY IN RESPONDING TO CHG'S SETTLEMENT DEMAND (0.3); CONFERENCE CALL WITH NC COUNSEL REGARDING STATUS OF CHG LAWSUIT AND RELATED ISSUES (0.7)	1.0	\$595.00
09/07/21	GOUVEIA	28	EMAIL CORRESPONDENCE WITH FOX TEAM REGARDING PREPARATION FOR PRELIMINARY HEARING ON THURSDAY REGARDING CHG STAY RELIEF MOTION.	0.1	\$55.00

Date	Timekeeper	Task	Description	Hours	Amount
09/07/21	GOUVEIA	28	REVIEW PROPOSED AGENDA FOR SEPTEMBER 9 HEARING ON CHG STAY RELIEF MOTION.	0.1	\$55.00
09/08/21	CANECO	28	CONFERENCE CALL WITH J. WIDMAN, G. GOUVEIA AND S. NIEDERMAN REGARDING CHG SETTLEMENT PROPOSAL AND PREPARATION FOR CONTINUED PRELIMINARY HEARING ON STAY RELIEF MOTION.	0.6	\$264.00
09/08/21	CANECO	28	PREPARATION AND OUTLINING FOR ARGUMENT/COURT APPEARANCE ON LIMITED STAY RELIEF MOTION	2.7	\$1,188.00
09/08/21	GOUVEIA	28	CONFERENCE CALL WITH J. WIDMAN, J. CANECO AND S. NIEDERMAN REGARDING CHG SETTLEMENT PROPOSAL AND PREPARATION FOR CONTINUED PRELIMINARY HEARING ON STAY RELIEF MOTION.	0.6	\$330.00
09/08/21	GOUVEIA	28	REVIEW AND COMMENT ON ARGUMENT OUTLINE FOR TOMORROW'S HEARING ON STAY RELIEF MOTION (.5); EMAIL CORRESPONDENCE WITH J. CANECO REGARDING SAME (.1).	0.6	\$330.00
09/08/21	NIEDERMAN	28	TELEPHONE CALL WITH CO-COUNSEL IN PREPARATION FOR ARGUMENT ON STAY RELIEF MOTION	0.5	\$282.50
09/08/21	WIDMAN	28	CONFERENCE CALL W/G. GOUVEIA, S. NIEDERMAN AND J. CANECO RE: CHG'S SETTLEMENT PROPOSAL AND PREPARATION FOR CONTINUED HEARING ON MOTION FOR RELIEF FROM STAY	0.6	\$357.00
09/09/21	CANECO	28	PREPARATION AND REVISION OF OUTLINE FOR HEARING AND ARGUMENT	1.0	\$440.00
09/09/21	CANECO	28	POST-HEARING DEBRIEF AND CONFERENCE WITH G. GOUVEIA, J. WIDMAN. S. NIEDERMAN	0.5	\$220.00
09/09/21	CANECO	28	REVIEW/COMMENT ON PROPOSED ORDER FOR	0.3	\$132.00

Date	Timekeeper	Task	Description	Hours	Amount
			LIMITED STAY RELIEF; INTERNAL DISCUSSION WITH FOX TEAM RE: SAME		
09/09/21	GOUVEIA	28	EMAIL CORRESPONDENCE WITH J. CANECO IN PREPARATION FOR TODAY'S HEARING ON CHG STAY RELIEF MOTION (.1); ATTEND WEBEX WITH J. CANECO, S. NIEDERMAN AND J. WIDMAN FOLLOWING HEARING (.5); REVIEW PRECEDENT FOR STAY RELIEF AS TO D&O POLICY PROCEEDS (.2); EMAIL CORRESPONDENCE WITH FOX TEAM REGARDING SAME (.1); LISTEN TO RECORDING OF STAY RELIEF HEARING IN HMR FOODS CASE (.5); FOLLOW UP EMAIL CORRESPONDENCE WITH FOX TEAM (.1); REVIEW PROPOSED ORDER GRANTING LIMITED STAY RELIEF (.1) AND EMAIL CORRESPONDENCE WITH J. CANECO REGARDING SAME (.1).	1.7	\$935.00
09/09/21	NIEDERMAN	28	POST-HEARING DEBRIEF AND CONFERENCE WITH G. GOUVEIA, J. WIDMAN. AND J. CANECO	0.5	\$282.50
09/09/21	NIEDERMAN	28	REVIEW OF PROPOSED ORDER GRANTING LIMITED RELIEF FROM THE AUTOMATIC STAY TO PERMIT THE STATE COURT TO RULE ON THE PENDING MOTION TO DISMISS IN THE STATE COURT ACTION	0.2	\$113.00
09/09/21	WIDMAN	28	PREPARED FOR AND ATTENDED HEARING ON CHG'S MOTION FOR RELIEF FROM STAY (1.5); REVIEWED PROPOSED ORDER RE: SAME (.3); CONFERENCE CALL W/G. GOUVEIA, J. CANECO AND S. NIEDERMAN RE: SAME (.5)	2.3	\$1,368.50
09/10/21	NIEDERMAN	28	REVIEW ORDER GRANTING LIMITED STAY RELIEF AND REVIEW CORRESPONDENCE FROM MOVANTS RE EXPIRATION OF SETTLEMENT PROPOSAL	0.2	\$113.00
09/11/21	GOUVEIA	28	REVIEW ENTERED ORDER	0.1	\$55.00

Date	Timekeeper	Task	Description	Hours	Amount
			GRANTING LIMITED RELIEF FROM AUTOMATIC STAY FOR CHG STATE COURT TO RULE ON MOTION TO DISMISS.		
09/13/21	CANECO	28	RESEARCH REGARDING TREATMENT OF INSURANCE PROCEEDS AS PROPERTY OF ESTATE FOR STAY RELIEF	3.5	\$1,540.00
09/14/21	CANECO	28	DRAFTING NOTES ON D&O RESEARCH	2.5	\$1,100.00
09/14/21	CANECO	28	CONFERENCE CALL WITH J. WIDMAN AND G. GOUVEIA REGARDING STATUS OF CHG STAY RELIEF MOTION AND RESPONSE TO SETTLEMENT PROPOSAL.	0.6	\$264.00
09/14/21	CANECO	28	DRAFTING COUNTEROFFER LANGUAGE FOR INTERNAL DISCUSSION AND RELATED EMAILS	0.5	\$220.00
09/14/21	GOUVEIA	28	CONFERENCE CALL WITH J. WIDMAN AND J. CANECO REGARDING STATUS OF CHG STAY RELIEF MOTION AND RESPONSE TO SETTLEMENT PROPOSAL (.6); EMAIL CORRESPONDENCE WITH J. WIDMAN AND J. CANECO REGARDING SETTLEMENT COUNTERPROPOSAL (.2).	0.8	\$440.00
09/14/21	WIDMAN	28	PHONE CALL W/G. GOUVEIA AND J. CANECO RE: RESPONDING TO CHG'S SETTLEMENT DEMAND	0.6	\$357.00
09/15/21	CANECO	28	CONFERENCE WITH CASE PROFESSIONALS RE: STAY MOTION AND OPTIONS FOR APPROACHES	0.3	\$132.00
09/15/21	CANECO	28	CONFERENCE WITH G. GOUVEIA RE: ANALYSIS OF CALL WITH LENDER AND DEBTOR PROFESSIONALS; STRATEGY FOR RESPONSE TO CHG	0.2	\$88.00
09/15/21	GOUVEIA	28	PHONE CALL WITH CO-COUNSEL REGARDING CHG SETTLEMENT STRATEGY (.2); EMAIL CORRESPONDENCE WITH FOX TEAM REGARDING SETTLEMENT COUNTERPROPOSAL AND RELATED ISSUES (.1); EMAIL CORRESPONDENCE (.1) AND	0.9	\$495.00

Date	Timekeeper	Task	Description	Hours	Amount
			CONFERENCE CALL (.3) WITH COUNSEL FOR DEBTORS AND HAYFIN REGARDING CALL TO DISCUSS CHG SETTLEMENT COUNTERPROPOSAL; FOLLOW UP CALL WITH J. CANECO REGARDING NEXT STEPS STRATEGY (.2)		
09/15/21	NIEDERMAN	28	CONFER WITH CO-COUNSEL AND REVIEW OF CORRESPONDENCE TO COMMITTEE RE STATUS OF SETTLEMENT NEGOTIATIONS WITH COMMUNITY HEALTH GROUP AND COUNTER--PROPOSAL TO RESOLVE ACCESS TO INSURANCE PROCEEDS DISPUTE	0.2	\$113.00
09/17/21	GOUVEIA	28	EMAIL CORRESPONDENCE WITH COUNSEL FOR HAYFIN REGARDING PROPOSED SETTLEMENT STRATEGY (.1); EMAIL CORRESPONDENCE WITH J. WIDMAN AND J. CANECO REGARDING DELIVERY OF SETTLEMENT COUNTERPROPOSAL TO CHG COUNSEL (.1).	0.2	\$110.00
09/17/21	NIEDERMAN	28	REVIEW CORRESPONDENCE FROM CO-COUNSEL REGARDING SETTLEMENT NEGOTIATIONS WITH COMMUNITY HEALTH GROUP AND COUNTER--PROPOSAL TO RESOLVE ACCESS TO INSURANCE PROCEEDS DISPUTE	0.2	\$113.00
09/21/21	CANECO	28	CONFERENCE WITH G. GOUVEIA, S. NIEDERMAN, J. WIDMAN RE: COUNTEROFFER OF CHG	0.3	\$132.00
09/21/21	CANECO	28	REVIEW AND ANALYZE CHG COUNTER-OFFER OF SETTLEMENT AND REVIEW CASE LAW RE: SAME	0.5	\$220.00
09/21/21	GOUVEIA	28	EMAIL CORRESPONDENCE WITH FOX TEAM REGARDING STATUS OF CHG SETTLEMENT NEGOTIATIONS AND SCHEDULING CALL TO DISCUSS FINAL HEARING PREP (.1); REVIEW CHG RESPONSE TO SETTLEMENT COUNTEROFFER (.2); CONFERENCE CALL WITH	0.6	\$330.00

Date	Timekeeper	Task	Description	Hours	Amount
09/21/21	NIEDERMAN	28	FOX TEAM REGARDING SETTLEMENT STRATEGY (.3) REVIEW CORRESPONDENCE FROM CO-COUNSEL STATUS OF SETTLEMENT TALKS RE RELIEF FROM STAY MOTION AND PROPOSED CAP ON ACCESS TO INSURANCE POLICY	0.1	\$56.50
09/21/21	NIEDERMAN	28	REVIEW CORRESPONDENCE FROM CO-COUNSEL SETTLEMENT STRATEGY CONCERNING STAY RELIEF MOTION AND OUTSTANDING COUNTER-PROPOSAL AND T/C WITH CO-COUNSEL RE SAME	0.2	\$113.00
09/21/21	WIDMAN	28	REVIEWED SETTLEMENT PROPOSAL FROM CHG'S COUNSEL (.3); CONFERENCE W/G. GOUVEIA RE: SAME (.2)	0.5	\$297.50
09/22/21	GOUVEIA	28	CONFER WITH J. WIDMAN REGARDING STATUS OF SETTLEMENT NEGOTIATIONS WITH CHG COUNSEL.	0.2	\$110.00
09/22/21	WIDMAN	28	PHONE CALL W/COUNSEL FOR CHG RE: SETTLEMENT OF MOTION FOR RELIEF FROM STAY (.3); CORRESPONDENCE W/G. GOUVEIA RE: SAME (.2)	0.5	\$297.50
09/23/21	GOUVEIA	28	EMAIL CORRESPONDENCE WITH J. WIDMAN REGARDING STATUS OF SETTLEMENT NEGOTIATIONS WITH CHG COUNSEL.	0.2	\$110.00
09/24/21	GOUVEIA	28	EMAIL CORRESPONDENCE WITH J. WIDMAN REGARDING STATUS OF CHG SETTLEMENT NEGOTIATIONS.	0.2	\$110.00
09/24/21	NIEDERMAN	28	ATTENTION TO SETTLEMENT OF CHG STAY RELIEF MOTION AND NOTICE TO CHAMBERS RE SAME	0.3	\$169.50
09/24/21	WIDMAN	28	MULTIPLE PHONE CALLS AND EMAILS WITH COUNSEL FOR COMMUNITY HEALTH GROUP TO NEGOTIATE SETTLEMENT OF CHG'S MOTION FOR RELIEF FROM STAY	0.8	\$476.00
09/25/21	GOUVEIA	28	EMAIL CORRESPONDENCE WITH FOX TEAM REGARDING FOLLOW UP ON CHG	0.2	\$110.00

Date	Timekeeper	Task	Description	Hours	Amount
			SETTLEMENT INCLUDING NOTIFICATION OF OTHER PARTIES AND DOCUMENTATION OF SAME.		
09/27/21	CANECO	28	REVIEWING PROPOSED STIPULATION AND ORDER GRANTING STAY RELIEF AND PROVIDING/ INCORPORATING COMMENTS TO THE SAME	1.1	\$484.00
09/27/21	GOUVEIA	28	EMAIL CORRESPONDENCE WITH FOX TEAM REGARDING STATUS OF CHG SETTLEMENT AND NOTIFICATION TO COURT AND OTHER PARTIES (.1); EMAIL CORRESPONDENT WITH DEBTORS' COUNSEL REGARDING STATUS OF CHG SETTLEMENT AND AGENDA FOR WEDNESDAY HEARING (.1); REVIEW AND COMMENT ON DRAFT STIPULATION AND AGREED ORDER RESOLVING CHG STAY RELIEF MOTION (.2); EMAIL CORRESPONDENCE WITH FOX TEAM REGARDING SAME (.1); EMAIL CORRESPONDENCE WITH HAYFIN COUNSEL REGARDING PROPOSED SETTLEMENT (.1).	0.6	\$330.00
09/27/21	NIEDERMAN	28	REVIEW AND ATTENTION TO THE STATUS OF COMMUNITY HEALTH GROUP SETTLEMENT AND INDICATION OF SUCH ON AGENDA OF MATTERS SCHEDULED FOR HEARING AS WELL AS REVIEW OF PROPOSED STIPULATION RE SAME	0.2	\$113.00
09/27/21	NIEDERMAN	28	REVIEW CORRESPONDENCE RE LENDER INQUIRY RE STATUS OF CHG SETTLEMENT AND TERMS	0.1	\$56.50
09/27/21	WIDMAN	28	MULTIPLE PHONE CALLS AND CORRESPONDENCE W/COUNSEL FOR CHG AND DEBTOR RE: SETTLEMENT OF MOTION FOR RELIEF FROM STAY	1.0	\$595.00
09/28/21	GOUVEIA	28	EMAIL CORRESPONDENCE AND EXCHANGE VOICEMAIL MESSAGES WITH DEBTORS' COUNSEL REGARDING	0.7	\$385.00

Date	Timekeeper	Task	Description	Hours	Amount
			PROPOSED STIPULATION AND CONSENT ORDER RE CHG STAY RELIEF MOTION (.2); FOLLOW UP EMAIL CORRESPONDENCE AND PHONE CALL WITH J. WIDMAN REGARDING DEBTOR CONCERNS RELATED TO PROPOSED SETTLEMENT OF STAY RELIEF MOTION (.2); PHONE CALL WITH E. CHAFETZ REGARDING SAME (.2); EMAIL CORRESPONDENCE WITH HAYFIN COUNSEL REGARDING STATUS OF SETTLEMENT AND TOMORROW'S HEARING (.1).		
09/28/21	NIEDERMAN	28	REVIEW DEBTORS' INQUIRY FROM DEBTORS RE TERMS OF CHG SETTLEMENT AND REVIEW OF CORRESPONDENCE WITH CO-COUNSEL AND COUNSEL FOR CHG RE SAME	0.4	\$226.00
09/28/21	NIEDERMAN	28	REVIEW CORRESPONDENCE FROM DEBTORS AND LENDERS RESOLVING CONCERNS RELATED TO CHG SETTLEMENT AND APPROVING CERT OF COUNSEL RE SAME	0.2	\$113.00
09/28/21	WIDMAN	28	MULTIPLE PHONE CALLS W/COUNSEL FOR CHG, DEBTOR TO NEGOTIATE STIPULATION REGARDING CHG'S MOTION FOR RELIEF FROM STAY	1.5	\$892.50
09/29/21	GOUVEIA	28	EMAIL CORRESPONDENCE WITH FOX TEAM REGARDING FINALIZATION OF STIPULATION AND CONSENT ORDER RESOLVING CHG STAY RELIEF MOTION.	0.2	\$110.00
09/29/21	GOUVEIA	28	REVIEW ENTERED ORDER APPROVING STIPULATION MODIFYING THE AUTOMATIC STAY FOR CHG TO RESUME STATE COURT PROCEEDINGS TO LIQUIDATE COUNTERCLAIMS.	0.1	\$55.00
09/29/21	NIEDERMAN	28	REVIEW AND ATTENTION TO THE RESOLUTION OF CHG STAY RELIEF MOTION AS WELL AS STIPULATION	0.4	\$226.00

Date	Timekeeper	Task	Description	Hours	Amount
			DOCUMENTING SAME AND HEARING ON SAME		
09/29/21	WIDMAN	28	MULTIPLE PHONE CALLS AND CORRESPONDENCE W/COUNSEL FOR CHG AND DEBTOR RE: SETTLEMENT OF MOTION AND STIPULATION	1.0	\$595.00
			TOTAL	89.2	\$45,037.00

TASK SUMMARY:

Task	Description	Hours	Total
1	CASE ADMINISTRATION	6.9	\$3,105.00
3	CREDITORS AND CLAIMS	5.0	\$2,916.50
9	PRE-PETITION LITIGATION	0.2	\$113.00
11	PLAN	20.8	\$10,078.50
14	FEE APPLICATIONS	6.5	\$2,627.00
18	SETTLEMENT/ADR	0.2	\$113.00
21	COMMITTEE MEETINGS AND COMMUNICATIONS	1.7	\$935.00
22	OTHER CREDITOR MEETING AND COMMUNICATIONS	0.2	\$113.00
23	COURT HEARINGS	3.7	\$1,921.50
24	ASSET ANALYSIS AND RECOVERY	2.0	\$1,190.00
28	AUTOMATIC STAY	42.0	\$21,924.50

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours	Rate	Total
G.E. GOUVEIA	19.6	\$550.00	\$10,780.00
J.L. WIDMAN	15.2	\$595.00	\$9,044.00
S. A. NIEDERMAN	18.6	\$565.00	\$10,509.00
J. A. CANECO	25.5	\$440.00	\$11,220.00
S. SLATER	0.9	\$355.00	\$319.50
S. GREEN	4.4	\$250.00	\$1,100.00
R. I. SOLOMON	4.7	\$415.00	\$1,950.50
M. L. STEEN	0.3	\$380.00	\$114.00
TOTAL	89.2		\$45,037.00

TOTAL PROFESSIONAL SERVICES \$45,037.00

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
WESTLAW, RESEARCH WEST PAYMENT CENTER WESTLAW, RESEARCH 205 - REMOVING DUP COST FROM UPLOAD FILE (8/15 INCLUDED TWICE)	(\$12.69)
WESTLAW, RESEARCH 205	\$16.80
WESTLAW, RESEARCH 205	\$12.69
COURT FILINGS WELLS FARGO CREDIT CARD - Court Filing Fee	\$50.00
WESTLAW, RESEARCH 205	\$12.69
	TOTAL EXPENSES <u> \$79.49</u>
	TOTAL AMOUNT OF THIS INVOICE \$45,116.49

Exhibit B

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
WESTLAW, RESEARCH 205	\$16.80
WESTLAW, RESEARCH 205	\$12.69
COURT FILINGS WELLS FARGO CREDIT CARD - Court Filing Fee	\$50.00
TOTAL EXPENSES	\$79.49

Exhibit C

PROJECT CATEGORY TASK CODES

TASK CODE	DESCRIPTION
1	CASE ADMINISTRATION
2	GENERAL INVESTIGATION
3	CREDITORS AND CLAIMS
4	CASH COLLATERAL/DIP FINANCING
5	UNEXPIRED LEASES
6	EXECUTORY CONTRACTS
7	STATEMENTS AND SCHEDULES
8	UTILITY ISSUES
9	PRE-PETITION LITIGATION
10	DISCLOSURE STATEMENT
11	PLAN OF REORGANIZATION
12	EMPLOYEE ISSUE
13	TAX ISSUES
14	FEE APPLICATIONS
15	CASE CLOSING
16	RETENTION OF PROFESSIONALS
17	SALE OF ASSETS
18	SETTLEMENT/ADR
19	REAL ESTATE MATTERS
20	INSURANCE MATTERS
21	COMMITTEE MEETINGS AND COMMUNICATIONS
22	OTHER CREDITOR MEETING AND COMMUNICATIONS
23	OMNIBUS HEARINGS
24	ASSET ANALYSIS AND RECOVERY
25	ASSET DISPOSITION
26	BUSINESS OPERATIONS

27	CONTESTED MATTERS/ADVERSARY PROCEEDINGS
28	AUTOMATIC STAY
29	CHALLENGE INVESTIGATION
30	DISCOVERY

**21-10883 IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AH LIQUIDATION, INC., *et al.*,¹

Debtors.

Chapter 11

Case No.: 21-10883 (CTG)

(Jointly Administered)

Objections Due: November 29, 2021 at 4:00 p.m.

**NOTICE OF FOURTH MONTHLY FEE APPLICATION OF FOX ROTHSCHILD LLP
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD OF SEPTEMBER 1, 2021 THROUGH SEPTEMBER 30, 2021**

PLEASE TAKE NOTICE that Fox Rothschild LLP (the “**Applicant**”) has filed the attached *Fourth Monthly Fee Application of Fox Rothschild LLP for Services Rendered and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for the Period of September 1, 2021 through September 30, 2021* (the “**Application**”).

PLEASE TAKE FURTHER NOTICE that responses or objections to the Application, if any, are to be filed on or before **November 29, 2021 at 4:00 p.m. (Prevailing Eastern Time)** (the “**Objection Deadline**”). At the same time, you must serve a copy of the objection or response on the undersigned attorneys.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon the following: (i) the Debtors c/o Carl Marks Advisory Group LLC, 900 Third Avenue, 33rd Floor, New York, NY 10022, Attn: Keith Daniels (kdaniels@carlmarks.com); (ii) counsel for the Debtors, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, De 19801, Attn: Laura Davis Jones, Esq. (ljones@pszjlaw.com) and Timothy P. Cairns, Esq. (tcairns@pszjlaw.com) and Chapman and Cutler LLP, 1270 Avenue of the Americas, New York, NY 10020, Attn: Larry G. Halperin (halperin@chapman.com) and Joon P. Hong (joonhong@chapmen.com); (iii) counsel to the DIP Agent and Administrative Agent, Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153, Attn: David N. Griffiths (David.griffiths@weil.com) and Bryan R. Podzius (bryan.podzius@weil.com) and Richards Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, DE 19801, Attn: Zachary I Shapiro (shapiro@rlf.com); and (iv) Office of the United States Trustee, District of Delaware, 844 N. King Street, Suite 2207, Lockbox 35,

¹ The Debtors, along with the last four digits of each Debtor’s federal tax identification number are: Avadim Health, Inc. (8411); Avadim Health IP, Inc. (7594); Bionome Properties Corp. (6483); Quality Assurance Associates, Inc. (5613); and Relion Manufacturing, Inc. (0430). The Debtors’ business address is 81 Thompson Street, Asheville, NC 28803.

Wilmington, DE 19801 Attn: Richard L. Schepacarter (richard.schepacarter@usdoj.gov); and Counsel to the Creditors' Committee, Fox Rothschild LLP, 919 N. Market Street, Suite 300, Wilmington, DE 19899-2323 Attn: Seth A. Niederman (sniederman@foxrothschild.com) and 345 California Street, Suite 2200, San Francisco, CA 94104 Attn: Michael A. Sweet, Esq. (msweet@foxrothschild.com) and 321 North Clark Street, Suite 1600, Chicago, IL 60654 Attn: Gordon E. Gouveia, Esq. (ggouveia@foxrothschild.com) and Lowenstein Sandler LLP, 1251 Avenue of the Americas, New York, New York 10020, Attn: Robert M. Hirsh (rhirsh@lowenstein.com) and Eric S. Chafetz (echafetz@lowenstein.com).

PLEASE TAKE FURTHER NOTICE that if any responses are timely filed in accordance with this Notice, a hearing on the Motion will be held on **a date and time to be determined** before The Honorable Craig T. Goldblatt at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that pursuant to the *Court's Order (I) Establishing Procedures for Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief*, entered June 28, 2021 (the "Interim Compensation Order")² [D.I. 134], upon the expiration of the Objection Deadline, the Applicant may be paid an amount equal to (i) 80% of the fees and 100% of expenses requested in the Application if no objection to the Application is timely filed, served and received by the Objection Deadline or (ii) 80% of the fees and 100% of the expenses not subject to such an objection, in either case, without the need for further order of the Bankruptcy Court.

Dated: November 4, 2021

FOX ROTHSCHILD LLP

/s/ Seth A. Niederman

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-and-

² Capitalized terms used herein but not capitalized shall have the meaning(s) ascribed to them in the Interim Compensation Order.

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-and-

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Unsecured Creditors*