

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
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In re

Chapter 11

RUDOLPH W. GIULIANI  
a/k/a RUDOLPH WILLIAM GIULIANI

Case No.: 23-12055

Debtor

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**DEBTOR'S OPPOSITION TO THE FEE APPLICATION OF GLOBAL DATA RISK,  
LLC.**

**TO: THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE**

Rudolph W. Giuliani, the Debtor and Debtor-in-Possession herein ("Debtor") by and through his attorneys Berger, Fischhoff, Shumer, Wexler & Goodman, LLP as and for his response to the application by Global Data Risk, LLC ("GDR"), specialized forensic financial advisor to the Official Committee of Unsecured Creditors for allowance of fees and expenses, respectfully sets forth and submits as follows:

**BACKGROUND**

1. The Debtor commenced a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on December 21, 2023.
2. An Official Committee of unsecured creditors was appointed on January 12, 2024.
3. The Official Committee retained GDR to serve as a specialized forensic financial advisor on February 9, 2024.
4. A Retention Application requesting court approval of the appointment was submitted on March 20, 2024.
5. An Order approving the aforementioned retention was entered on April 19, 2024.

6. The Chapter 11 case was dismissed on July 12, 2024.

7. On August 19, 2024, GDR submitted its Final Fee Application, with respect to services rendered to the Official Committee of Unsecured Creditors in relation to the case herein.

8. GDR's Application, submitted pursuant to §330(a) and §331 of Title 11 of the United States Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York, requested approval of compensation for services rendered from February 9, 2024 through July 11, 2024.

9. GDR's Application seeks final approval of compensation in the amount of \$324,843.75, representing 1,181.25 hours of services, and final allowance of expenses incurred of \$6,854.29.

#### **JURISDICTION AND VENUE**

10. The United States Bankruptcy Court for the Southern District of New York (this Honorable "Court") maintains jurisdiction over the instant Opposition to Fee Application pursuant to 28 U.S.C. §1334. This matter is a core proceeding within the meaning of 28 U.S.C. §157(b)(2). To the extent it is later determined that the Court lacks authority consistent with Article III of the U.S. Constitution to enter a final order, the Debtor consents to entry by the Court of a final order.

11. Venue in this Court is proper pursuant to 28 U.S.S. §§ 1408 and 1409.

#### **APPLICABLE RULES**

12. Authority is vested in the Court to determine whether one is entitled to compensation requested and if so, whether requested compensation is reasonable. *York International Building, Inc. v. Chaney*, 527 F.2d 1061, 1077 (9th Cir. 1975). *In re Aminex Corp.*, 15 B.R. 356, 360, 5 C.B.C.2d 155 (Bankr. S.D.N.Y. 1981).

13. A fee applicant bears the burden of proof on his claim for compensation. *Houlihan Lokey Howard & Zukin Capital v. High River Ltd. P'Ship*, No. 05 Civ. 5726 (BSJ), 369 B.R. 111, 2007 U.S. Dist. LEXIS 30426, 2007 WL 1217268 (S.D.N.Y. Apr. 24, 2007); *In re Keene Corp.*, 205 B.R. 690, 695 (Bankr. S.D.N.Y. 1997).

14. 11 U.S.C. §330 provides guidelines for fee applicants and dictates the appropriate compensation. In particular, §330(a)(3) lists a non-exhaustive list regarding factors to be considered in evaluating compensation, including “. . . the nature, the extent, and the value of such services, taking into account all relevant factors, including . . .the time spent on such services . . . 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. . . 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.” §330(a)(4) goes on to state that compensation shall not be permitted for unnecessary duplication of services, or services that were either not reasonably likely to benefit the debtor’s estate or necessary to the administration of the case.

15. In disputing a fee request, an objector must “identify any allegedly improper, insufficient, or excessive entries and direct the Court's attention to them. The objector should also be able to identify a reason why [such entries] . . . are not reasonable . . . and offer evidence supporting its position.” *In re Blackwood Assocs., L.P.*, 165 B.R. 108(1994)(*quoting In re Hunt's Health Care*, 161 B.R. 971).

## **LEGAL ARGUMENT**

### **I. The Fees Sought Are Duplicitous**

16. §330(a)(4) explicitly states that compensation is not to be permitted for services that are duplicative.

17. A review of the Billing and Expense Details (*Exhibit E of GDR's Application*), demonstrates that the employees and staff of GDR routinely engaged in such duplicative billing in that multiple individual timekeepers charged for attendance at the same event, meeting, or discussion and/or completion of the same service, thereby creating duplicate time entries for any given single service.

18. Not only do several entries bear the same time, date, and task description with minute changes, some even appear to be copied and pasted entirely. The below cited time entries tend to carry overlapping timeframes, indicative that a single given event/task was being conducted contemporaneously by multiple different timekeepers, and being billed more than once.

19. The Court is directed to the following examples of time entries within GDR's *Exhibit E* demonstrating the duplicitous billing custom:

**February 12, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Akin Meeting.	1.0
E. Laykin	Kick-off meeting with Akin and GDR	1.0
H. Looney	Note-taking for kick off call with UCC and internal team.	1.0
J. Bass	Large group kick off call with Akin.	1.0
L. Snow	Call with Akin and GDR team (partial).	0.5
<b>Total</b>		<b>4.5</b>

**February 13, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Planning call with J. Bass, E. Laykin and H. Looney	1.0

E. Laykin	Planning call with J. Bass, E. Laykin and H. Looney	1.0
H. Looney	Note-taking for kick off call with UCC and internal team.	1.0
J. Bass	Large group kick off call with Akin.	1.0
<b>Total</b>		<b>4.0</b>

**February 14, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal GDR meeting with L. Snow re case objectives.	.5
L. Snow	Internal GDR meeting with B. Ebert re case strategy.	.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	Planning call with J. Bass re project strategy.	.5
J. Bass	Planning call with E. Laykin re project strategy.	.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with [REDACTED] for internal objectives and project management strategy.	.5
[REDACTED]	Meeting with B. Ebert for internal objectives and project management strategy.	.5
<b>Total</b>		<b>1.0</b>

**February 16, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
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B. Ebert	Attend status conference with bankruptcy judge.	1.0
E. Laykin	Attend status conference with bankruptcy judge.	1.0
J. Bass	Attend status conference with bankruptcy judge.	1.0
L. Snow	Attend status conference with bankruptcy judge.	1.0
<b>Total</b>		<b>4.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	UCC Meeting.	1.0
E. Laykin	UCC Meeting.	1.0
J. Bass	Weekly call with UCC.	1.0
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	Team meeting with GDR re: taskings.	1.0
J. Bass	Call with team re case projects and strategy	1.0
<b>Total</b>		<b>2.0</b>

**February 18, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal GDR meeting with J. Bass and M. O'Dea re: open source media research.	.5
J. Bass	Internal GDR meeting with B. Ebert and M. O'Dea re: open source media research.	.5
M. O'Dea	Internal GDR meeting with J. Bass and B. Ebert re: open source media research.	.5
<b>Total</b>		<b>1.5</b>

**February 20, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with Akin re case strategy.	2.0
E. Laykin	Meeting with Akin in NYC re case matters.	2.0
J. Bass	Meeting in the offices of Akin with same Global Data Risk colleagues re case matters.	2.0
L. Snow	Meeting with Akin in NYC.	2.0
P. Orphanos	Team meeting at Akin and discussion of case administration.	2.0
<b>Total</b>		<b>10.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Extended internal working group session to prepare materials for 2004 filing with E. Laykin and J. Bass (5.5); documentation of notes re same (0.5).	6.0
E. Laykin	Extended internal working group session to prepare materials for 2004 filing with B. Ebert and J. Bass (5.5); documentation of notes re same (0.5).	6.0
J. Bass	Extended internal working group session to prepare materials for 2004 filing with B. Ebert and E. Laykin (5.5); documentation of notes re same (0.5).	6.0
<b>Total</b>		<b>18.0</b>

**February 21, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with Willkie re case matters.	2.0
E. Laykin	Meeting at Willkie re case matters.	2.0

J. Bass	“ . . . meeting with Willkie re case matters (2.0).”	2.0
L. Snow	Meeting with Willkie and GDR team re case matters.	2.0
P. Orphanos	Meeting at Willkie re: information from related cases.	2.0
<b>Total</b>		<b>10.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Review of 341 meeting transcript.	1.0
E. Laykin	Review of provided documents and 341 meeting transcript following meeting with Willkie.	3.0
J. Bass	Detailed review of 341 meeting transcript.	1.0
<b>Total</b>		<b>5.0</b>

**February 22, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with Akin (weekly).	1.0
E. Laykin	Weekly Meeting with Akin.	1.0
J. Bass	Weekly meeting with Akin.	1.0
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	Internal discussions with J. Bass on research findings.	2.0
J. Bass	Internal discussions with E. Laykin re: open source research.	2.0
<b>Total</b>		<b>4.0</b>



**February 23, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal GDR project management Meeting with [REDACTED].	0.5
E. Laykin	Meeting with B. Ebert regarding Master file and Timeline task.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
J. Bass	UCC call with L. Snow	0.5
L. Snow	UCC call with J. Bass	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
J. Bass	“Call with S. Ditto (0.5) . . .”	0.5
S. Ditto	“Call with J. Bass (0.5) . . .”	0.5
<b>Total</b>		<b>1.0</b>

**February 24, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal GDR meeting to discuss investigative operations.	1.0
J. Bass	Internal GDR meeting to discuss investigative operations.	1.0
<b>Total</b>		<b>2.0</b>

**February 26, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
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B. Ebert	Internal GDR investigative strategy session with J. Bass.	1.0
J. Bass	Call with B. Ebert re investigative strategy.	1.0
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal GDR project management meeting with [REDACTED].	1.0
[REDACTED]	Meeting with the GDR management project management team to discuss Management Master file and structure.	1.0
<b>Total</b>		<b>2.0</b>

**February 27, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Review of 2004 filing.	1.0
J. Bass	Review of debtor's tax filing (.5); review and expansion of 2004 bankruptcy filing (.5).	1.0
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
L. Snow	Discussion of analysis of debtor credit card data with [REDACTED].	0.5
[REDACTED]	Discussion of analysis of debtor credit card data with L. Snow.	0.5
<b>Total</b>		<b>1.0</b>

**February 28, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with Akin and Buchalter/Dominion.	1.0

H. Looney	Interview with Buchalter and Akin about case background and history.	1.0
J. Bass	Call with Dominion /Buchalter.	1.0
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Review of project master file with B. Ebert (.5) and work on reflecting the modification of Project master file (.5).	1.0
[REDACTED]	Review of project master file with B. Ebert (.5) and start work on reflecting the modification of Project master file (.5).	1.0
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Call with J. Bass in connection with UCC slide deck preparation.	1.0
J. Bass	Call with J. Bass in connection with UCC slide deck preparation.	1.0
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Call with J. Bass and planning for next days internal call with Akin.	0.5
J. Bass	Call with B. Ebert (.5) and planning for call with Akin.	0.5
<b>Total</b>		<b>1.0</b>

**February 29, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
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B. Ebert	Akin call with E. Laykin and J. Bass.	1.0
J. Bass	Weekly Akin meeting.	1.0
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with [REDACTED] re: research.	0.5
[REDACTED]	Meeting with B. Ebert re research matters.	0.5
<b>Total</b>		<b>1.0</b>

**March 1, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Preparation for UCC call.	0.5
J. Bass	Preparation for UCC call.	1.0
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly UCC meeting.	1.0
J. Bass	UCC Call.	1.0
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Media research re location and identification of debtor assets.	1.0
M. O'Dea	Media research re location and identification of debtor assets.	3.0
<b>Total</b>		<b>4.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
M. O'Dea	Project management support call with B. Ebert related to analytical tools for media research.	0.5
B. Ebert	Meeting with M. O'Dea re: media research.	0.5
<b>Total</b>		<b>1.0</b>

**March 2, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
[REDACTED]	Translating financial data into a searchable, tagging format.	3.0
[REDACTED]	Translating financial data into a searchable, tagging format.	2.0
<b>Total</b>		<b>5.0</b>

**March 3, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with [REDACTED] re: task tracking management.	0.5
[REDACTED]	Meeting with B. Ebert to discuss the taskings.	0.5
<b>Total</b>		<b>1.0</b>

**March 4, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with M. O'Dea to discuss results of media research.	1.0
M. O'Dea	Meeting with B. Ebert to discuss results of media research.	0.5
<b>Total</b>		<b>1.5</b>

**March 5, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
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B. Ebert	Meeting with [REDACTED] re: financial analysis and data structuring.	1.0
[REDACTED]	Meeting with B. Ebert re: financial analysis and data structuring.	1.0
<b>Total</b>		<b>2.0</b>

**March 6, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
[REDACTED]	Call with [REDACTED] to discuss research approach.	0.5
[REDACTED]	Call with [REDACTED] to discuss research approach.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	“ . . . executive planning call with J. Bass and E. Laykin (1.0).”	1.0
E. Laykin	Executive planning call with J. Bass and B. Ebert.	1.0
J. Bass	Executive planning call with E. Laykin and B. Ebert.	1.0
<b>Total</b>		<b>3.0</b>

**March 7, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly meeting with Akin.	0.5
E. Laykin	Weekly meeting with Akin.	0.5
J. Bass	Weekly call with Akin.	0.5
L. Snow	Weekly meeting with Akin.	0.5

<b>Total</b>		<b>2.0</b>
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<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Prepare for subject interview.	1.5
J. Bass	Preparation for subject interview.	0.5
<b>Total</b>		<b>2.0</b>

**March 8, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly UCC meeting.	0.5
B. Ebert	Meeting with R. Biblo Block & L. Snow to discuss tax returns.	0.5
L. Snow	Call with Akin regarding tax returns (.5); call with Akin and UCC (.5).	1.0
<b>Total</b>		<b>2.0</b>

**March 11, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Pre-interview meeting with J. Bass, E. Laykin, and Akin.	0.5
E. Laykin	Prep meeting with Akin, J. Bass, and B. Ebert.	0.5
J. Bass	Interview prep meeting with Akin, E. Laykin and B. Ebert.	0.5
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Interview assisted by E. Laykin, J. Bass, and Akin.	2.0
E. Laykin	Participate in third party interview with J. Bass and B. Ebert	2.0

J. Bass	Interview assisted by E. Laykin, B. Ebert, and Akin.	2.0
<b>Total</b>		<b>6.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
[REDACTED]	“Conduct open source research. . . and drafting report re same (2).”	2.0
[REDACTED]	Drafting of open source research report.	2.0
<b>Total</b>		<b>4.0</b>

**March 12, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
[REDACTED]	Preparing the documents structure including the Documents master files.	0.5
[REDACTED]	Preparing the documents structure including the Documents master files.	3.5
<b>Total</b>		<b>4.0</b>

**March 13, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Edits and collaboration with H. Looney and Akin team re retention application.	0.5
H. Looney	Edits and collaboration with B. Ebert and Akin team re retention application.	1.0
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with J. Bass to discuss application retention edits.	1.0



J. Bass	Meeting with J. Bass to discuss application retention edits.	1.0
<b>Total</b>		<b>2.0</b>

**March 14, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
J. Bass	Weekly meeting with Akin.	0.5
L. Snow	Call with Akin.	0.5
P. Orphanos	Weekly Akin meeting.	0.5
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting (in person) with J. Bass re: investigation.	1.0
J. Bass	Meeting with B. Ebert re investigative strategy.	1.0
<b>Total</b>		<b>2.0</b>

**March 15, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly UCC call.	0.5
L. Snow	UCC weekly meeting.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
J. Bass	Coordination with [REDACTED] of research efforts.	1.0
[REDACTED]	Coordination with J. Bass of research efforts.	1.0
<b>Total</b>		<b>2.0</b>

**March 18, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	In person planning meeting with J. Bass.	1.0
J. Bass	Planning meeting with B. Ebert.	1.0
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with Akin (R. Biblo Block).	0.5
L. Snow	Call with Akin, R. Biblo Block regarding budget.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
H. Looney	Preparation of documents provided by Akin.	0.5
J. Bass	Review of submissions from Akin.	0.5
<b>Total</b>		<b>1.0</b>

**March 19, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal GDR meeting to discuss next steps re: research.	0.5
J. Bass	Internal GDR meeting to discuss next steps re: open source research.	0.5
[REDACTED]	Discussion with J. Bass re open source research.	0.5
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal GDR meeting to discuss next steps re: research.	0.5

J. Bass	Internal GDR meeting to discuss next steps re: open source research.	0.5
[REDACTED]	Discussion with J. Bass re open source research.	0.5
[REDACTED]	“. . . and meeting with J. Bass.”	0.5
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
M. O’Dea	Project management coordination with [REDACTED].	0.5
[REDACTED]	Project management coordination with M. O’Dea.	0.5
<b>Total</b>		<b>1.0</b>

**March 20, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with J. Bass re: project management analysis protocols.	0.5
J. Bass	Strategy meeting with B. Ebert.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting the [REDACTED] & H. Looney re: document tracking.	0.5
B. Ebert	Meeting with H. Looney and [REDACTED] to track document logging process and updates.	0.5
H. Looney	Meeting with [REDACTED] and B. Ebert to track document logging process and updates.	0.5
[REDACTED]	Meeting with H. Looney and B. Ebert to track document logging process and updates.	0.5

<b>Total</b>		<b>2.0</b>
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**March 21, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with L. Snow re: budget formation & document tracking.	0.5
L. Snow	“Meeting with B. Ebert re: budget formulation & document tracking (0.5) . . .”	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with Akin re: Investigative next steps and Akin/GDR info sharing.	0.5
B. Ebert	Weekly Akin/GDR team call.	1.0
J. Bass	Weekly meeting with Akin.	1.0
L. Snow	Call with Akin re next steps.	1.0
<b>Total</b>		<b>3.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Strategy meeting with E. Laykin and J. Bass	0.5
E. Laykin	Meeting with J. Bass and B. Ebert.	0.5
J. Bass	Meeting with E. Laykin and B. Ebert.	0.5
<b>Total</b>		<b>1.5</b>

**March 22, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	Weekly UCC Call.	0.5
J. Bass	Meeting with UCC.	0.5

L. Snow	UCC Weekly call.	0.5
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	Post-call re tasking.	0.5
J. Bass	Internal Review post-call we workstreams.	0.5
<b>Total</b>		<b>1.0</b>

**March 26, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	“ . . . GDR internal call re newly provided materials.”	0.5
J. Bass	GDR internal call re newly provided materials.	0.5
P. Orphanos	GDR internal call re newly provided materials.	0.5
<b>Total</b>		<b>1.5</b>

**March 27, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Call with J. Bass re: investigative progress.	0.5
J. Bass	Planning call with B. Ebert.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
H. Looney	Internal meeting to report on progress and summary of 2004 motion next steps.	0.5
J. Bass	Internal meeting to report on progress and summary of 2004 motion next steps..	0.5
[REDACTED]	Internal meeting to report on progress and summary of 2004 motion next steps.	0.5

<b>Total</b>		<b>1.5</b>
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**March 28, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Akin/GDR weekly meeting.	1.0
J. Bass	Call with Akin/GDR.	1.0
L. Snow	Call with Akin/GDR.	1.0
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
M. O’Dea	Call with [REDACTED] re workstreams.	0.5
[REDACTED]	Call with M. O’Dea re workstreams.	0.5
<b>Total</b>		<b>1.0</b>

**April 2, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with R. Biblo Block re support for 2004 Motion.	0.5
B. Ebert	Meeting with Akin re Rule 2004 Motion.	1.0
E. Laykin	Meeting with Akin team re Hearing on Rule 2004 Motion.	1.0
J. Bass	Meeting with Akin re Rule 2004 Motion hearing.	1.0
L. Snow	Meeting with Akin team re Hearing on Rule 2004 Motion.	1.0
<b>Total</b>		<b>4.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
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B. Ebert	Team collaboration with E. Laykin and J. Bass to respond to U.S. Trustee questions (0.5) and prepare for meeting with Akin (0.5).	1.0
E. Laykin	Team collaboration with B. Ebert and J. Bass to respond to U.S. Trustee questions (0.5) and prepare for meeting with Akin (0.5).	1.0
J. Bass	Team collaboration with E. Laykin and E. Laykin to respond to U.S. Trustee questions (0.5) and prepare for meeting with Akin (0.5).	1.0
<b>Total</b>		<b>3.0</b>

**April 4, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	Discussions with J. Bass of U.S. Trustee requirements.	0.5
J. Bass	Discussions with E. Laykin of US Trustee requirements.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	Hearing on Rule 2004 Motion.	1.5
J. Bass	Attend hearing on Rule 2004 Motion.	1.5
L. Snow	Attend hearing on Rule 2004 Motion.	1.5
<b>Total</b>		<b>4.5</b>

**April 6, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Coordination with Akin and J. Bass regarding U.S. Trustee feedback re retention Application.	1.0
J. Bass	Coordination with Akin and J. Bass regarding U.S. Trustee feedback re retention Application.	1.0

<b>Total</b>		<b>2.0</b>
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<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Strategy call with J. Bass.	0.5
J. Bass	Strategy call with B. Ebert.	0.5
<b>Total</b>		<b>1.0</b>

**April 8, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with GDR leadership & Akin re: investigative strategy.	1.0
E. Laykin	Meeting with GDR leadership & Akin re: investigative strategy.	1.0
J. Bass	Meeting with GDR leadership & Akin re: investigative strategy.	1.0
L. Snow	Meeting with GDR leadership & Akin re: investigative strategy.	1.0
<b>Total</b>		<b>4.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with L. Snow re: accounting protocols.	0.5
L. Snow	Meeting with B Ebert re: accounting protocols.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Planning call with J. Bass in advance of meeting with Akin re investigative progress.	1.0
J. Bass	Planning call with B. Ebert in advance of meeting with Akin.	1.0



<b>Total</b>		<b>2.0</b>
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<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Planning call with E. Laykin, J. Bass and H. Looney re investigative strategies and retention application.	0.5
E. Laykin	Planning call with J. Bass, H. Looney, and B. Ebert re investigative strategies and retention application.	0.5
H. Looney	Planning call with E. Laykin, J. Bass and B. Ebert re investigative strategies and retention application.	1.0
J. Bass	Planning call with E. Laykin, H. Looney, and B. Ebert re investigative strategies and retention application.	0.5
<b>Total</b>		<b>2.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with H. Looney re: retention application.	0.5
H. Looney	Meeting with B. Ebert re: retention application.	0.5
<b>Total</b>		<b>1.0</b>

**April 9, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with H. Looney and [REDACTED] to prepare for invoicing following retention process.	0.5
H. Looney	Meeting with B. Ebert and [REDACTED] to prepare for invoicing following retention process.	0.5

J. Bass	Meeting with B. Ebert and H. Looney to prepare for invoicing following retention process.	0.5
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting strategy discussion with J. Bass.	1.0
J. Bass	Meeting strategy discussion with B. Ebert.	1.0
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Feedback call re retention matters with J. Bass and E. Laykin following meeting with U.S. Trustee.	1.0
E. Laykin	Feedback call re retention matters with B. Ebert and J. Bass following meeting with US Trustee re Retention Application.	1.0
J. Bass	Feedback call re retention matters with B. Ebert and E. Laykin following meeting with U.S. Trustee re Retention Application.	1.0
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
H. Looney	Distribution of fee application tasks with [REDACTED].	0.5
[REDACTED]	Distribution of fee application tasks with H. Looney.	0.5
<b>Total</b>		<b>1.0</b>

April 10, 2024

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
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B. Ebert	Planning call with J. Bass on responding to Akin request re deposition support.	0.5
H. Looney	Planning call with B. Ebert on responding to Akin request re deposition support.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly GDR internal meeting re preparations for the deposition.	1.0
H. Looney	Weekly GDR internal meeting re preparations for the deposition.	1.0
J. Bass	Weekly GDR internal meeting re preparations for the deposition.	1.0
L. Snow	Weekly GDR internal meeting re preparations for the deposition.	1.0
[REDACTED]	Weekly GDR internal meeting re preparations for the deposition.	1.0
[REDACTED]	Weekly GDR internal meeting re preparations for the deposition.	1.0
P. Orphanos	Weekly GDR internal meeting re preparations for the deposition.	1.0
<b>Total</b>		<b>7.0</b>

**April 11, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly call with Akin.	0.5
E. Laykin	Weekly call with Akin.	0.5
J. Bass	Weekly call with Akin.	0.5
L. Snow	Weekly call with Akin.	0.5

<b>Total</b>		<b>2.0</b>
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<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal planning call with J. Bass in advance of call with Akin.	1.0
J. Bass	Internal planning call with B. Ebert in advance of call with Akin.	1.0
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with M. O’Dea to discuss/scope deposition materials.	0.5
M. O’Dea	Meeting with B. Ebert to discuss/scope deposition materials.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal strategy meeting to discuss deposition materials.	1.0
E. Laykin	Internal strategy meeting to discuss deposition prep.	1.0
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with E. Laykin, J. Bass and H. Looney to strategize deposition prep.	1.0
E. Laykin	Meeting with J. Bass, B. Ebert and H. Looney to discuss deposition prep.	1.0

H. Looney	Meeting with J. Bass, B. Ebert and E. Laykin to discuss deposition prep.	1.0
J. Bass	Meeting with E. Laykin and B. Ebert to discuss deposition prep.	1.0
<b>Total</b>		<b>4.0</b>

**April 12, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly meeting with UCC.	0.5
J. Bass	Weekly meeting of UCC.	0.5
L. Snow	Weekly meeting of UCC.	0.5
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Coordination call with J. Bass before weekly UCC call.	0.5
J. Bass	Coordination call with B. Ebert before weekly UCC call Akin.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal planning call with J. Bass in advance of call with Akin.	1.0
J. Bass	Internal planning call with B. Ebert in advance of call with Akin.	1.0
<b>Total</b>		<b>2.0</b>

**April 13, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
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B. Ebert	Meeting with E. Laykin to discuss deposition prep and support.	0.5
E. Laykin	Meeting with B. Ebert to discuss deposition prep and support.	0.5
<b>Total</b>		<b>1.0</b>

**April 14, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Coordination call with J. Bass on asset tracing initiatives and deposition plans.	0.5
J. Bass	Coordination call with B. Ebert on asset tracing initiatives and deposition plans.	0.5
<b>Total</b>		<b>1.0</b>

**April 15, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Pre-depo coordination with J. Bass and E. Laykin.	0.5
E. Laykin	Pre-depo coordination with B. Ebert and J. Bass.	0.5
J. Bass	Pre-depo coordination with B. Ebert and E. Laykin.	0.5
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Deposition of debtor.	3.0
E. Laykin	Deposition of debtor.	3.0
J. Bass	Deposition of debtor.	3.0
L. Snow	Deposition of debtor.	3.0

M. O’Dea	Deposition of debtor.	3.0
<b>Total</b>		<b>15.0</b>

**April 17, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly GDR Meeting.	0.5
H. Looney	Weekly GDR Meeting.	0.5
J. Bass	Weekly GDR Meeting.	0.5
L. Snow	Weekly GDR Meeting.	1.0
P. Orphanos	Weekly GDR Meeting.	0.5
[REDACTED]	Weekly GDR Meeting.	0.5
<b>Total</b>		<b>3.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Briefing J. Bass on discussion with R. Biblo Block re investigations workstream.	1.0
J. Bass	Briefing from B. Ebert re investigations tasks	1.0
<b>Total</b>		<b>2.0</b>

**April 19, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with E. Laykin & J. Bass re: investigations.	1.0
E. Laykin	Meeting with B. Ebert & J. Bass re: investigations.	1.0
J. Bass	Meeting with E. Laykin & B. Ebert re: investigations.	1.0
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	Weekly meeting with UCC.	1.0
J. Bass	Weekly meeting with UCC.	1.0
L. Snow	Weekly meeting with UCC.	1.0
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Follow on call with E. Laykin, L. Snow and J. Bass to assess information provided by deposition.	0.5
E. Laykin	Follow on call with B. Ebert, L. Snow and J. Bass to assess information provided by deposition.	0.5
J. Bass	Follow on call with E. Laykin, L. Snow and B. Ebert re deposition follow up.	0.5
L. Snow	Follow on call with E. Laykin, J. Bass and B. Ebert re deposition.	0.5
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with H. Looney re: project management.	1.0
H. Looney	Meeting with B. Ebert re: project management.	1.0
<b>Total</b>		<b>2.0</b>

**April 23, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
[REDACTED]	“ . . . Review of address research with [REDACTED] (1.0).”	1.0



[REDACTED]	Review of research re address verification with [REDACTED].	1.0
<b>Total</b>		<b>2.0</b>

**April 24, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly GDR Meeting.	0.5
H. Looney	Weekly GDR Meeting.	0.5
J. Bass	Weekly GDR Meeting.	0.5
[REDACTED]	Weekly GDR Meeting.	0.5
<b>Total</b>		<b>2.0</b>

**April 26, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Review with J. Bass re interview research report.	0.5
J. Bass	Review with B. Ebert re interview research report.	0.5
<b>Total</b>		<b>2.0</b>

**May 1, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting regarding location of subjects and service of subpoenas.	0.5
J. Bass	Meeting regarding location of subjects and service of subpoenas.	0.5
<b>Total</b>		<b>1.0</b>

**May 2, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
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B. Ebert	GDR/Akin weekly call.	1.0
H. Looney	GDR/Akin weekly call.	1.0
J. Bass	GDR/Akin weekly call.	1.0
L. Snow	GDR/Akin weekly call.	1.0
<b>Total</b>		<b>4.0</b>

**May 3, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly UCC meeting.	0.5
J. Bass	Weekly UCC meeting.	0.5
L. Snow	Weekly UCC meeting.	0.5
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Project management coordination with M. O'Dea.	0.5
M. O'Dea	Project management coordination with B. Ebert.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
J. Bass	Meeting with P. Orphanos, M. O'Dea, and PI re briefing on determining addresses for two persons requiring service of subpoenas.	0.5
M. O'Dea	Meeting with P. Orphanos, J. Bass, and PI re briefing on determining addresses for two persons requiring service of subpoenas.	0.5
P. Orphanos	Meeting with J. Bass, M. O'Dea, and PI re briefing on determining addresses for two persons requiring service of subpoenas.	0.5

<b>Total</b>		<b>1.5</b>
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**May 5, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting re: fees & expense statement with E. Laykin, J. Bass and L. Snow.	1.5
E. Laykin	Meeting re: fees & expense statement with B. Ebert, J. Bass and L. Snow.	1.5
J. Bass	Meeting re: fees & expense statement with E. Laykin, B. Ebert and L. Snow.	1.5
L. Snow	Meeting re: fees & expense statement with E. Laykin, J. Bass and B. Ebert.	1.5
<b>Total</b>		<b>6.0</b>

**May 6, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meetings with H. Looney re: fees & expenses statement.	1.5
H. Looney	Meetings with B. Ebert re: fees & expenses statement.	1.5
<b>Total</b>		<b>3.0</b>

**May 8, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	Call with J. Bass and L. Snow re Monthly Operating Reports.	0.5
J. Bass	Call with E. Laykin and L. Snow re Monthly Operating Reports.	0.5
L. Snow	Call with E. Laykin and J. Bass re Monthly Operating Reports.	0.5

<b>Total</b>		<b>1.5</b>
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<b>Name</b>	<b>Notes</b>	<b>Hours</b>
H. Looney	GDR Weekly Meeting.	0.5
J. Bass	GDR Weekly Meeting.	0.5
L. Snow	GDR Weekly Meeting.	0.5
[REDACTED]	GDR Weekly Meeting.	0.5
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
L. Snow	Call with P. Orphanos re Financial Presentation.	0.5
P. Orphanos	Call with L. Snow re Financial Presentation	0.5
<b>Total</b>		<b>1.0</b>

**May 9, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	GDR/Akin weekly call.	1.0
J. Bass	GDR/Akin weekly call.	1.0
L. Snow	GDR/Akin weekly call.	1.0
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with J. Bass and [REDACTED] to identify source for service of subpoena.	1.0
J. Bass	Meeting with [REDACTED] and B. Ebert to identify source of subpoena.	1.0

[REDACTED]	Meeting with J. Bass and B. Ebert to identify source of subpoena.	1.0
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Review and analyze debtor limited production.	1.5
L. Snow	Review (0.5) and analyze (1.0) debtor limited production.	1.5
<b>Total</b>		<b>3.0</b>

**May 10, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly UCC meeting with UCC.	0.5
E. Laykin	Weekly UCC meeting.	0.5
J. Bass	Weekly UCC meeting with UCC.	0.5
L. Snow	Weekly UCC meeting with UCC.	0.5
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
J. P. Bass	Audit of financial statements with [REDACTED].	1.0
[REDACTED]	Audit of financial statements with J. P. Bass	0.5
<b>Total</b>		<b>1.5</b>

**May 13, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with R. Biblo Block and A. Qureshi re: investigative strategy.	1.0

J. Bass	Meeting with R. Biblo Block and A. Qureshi re: investigative strategy.	1.0
<b>Total</b>		<b>2.0</b>

**May 14, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Attendance in Hearing for Freeman v. Giuliani adversary proceeding.	1.5
E. Laykin	Attendance in Hearing for Freeman v. Giuliani adversary proceeding.	1.5
J. Bass	Attendance in Hearing for Freeman v. Giuliani adversary proceeding.	1.5
L. Snow	Attendance in Hearing for Freeman v. Giuliani adversary proceeding.	1.5
<b>Total</b>		<b>6.0</b>

**May 16, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	GDR/ Akin weekly call.	0.5
L. Snow	GDR/ Akin weekly call.	0.5
<b>Total</b>		<b>1.0</b>

**May 17, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly UCC meeting.	0.5
E. Laykin	Weekly UCC meeting.	0.5
J. Bass	Weekly UCC meeting.	0.5
L. Snow	Weekly UCC meeting.	0.5
<b>Total</b>		<b>2.0</b>

May 20, 2024

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal meeting with [REDACTED], L. Snow, J. Bass, and H. Looney re: approach to files and investigative prioritization debtor-related documents.	1.0
H. Looney	Internal meeting with B. Ebert, L. Snow, J. Bass, and [REDACTED] re: approach to files and investigative prioritization debtor-related documents.	1.0
J. Bass	Internal meeting with B. Ebert, L. Snow, H. Looney, and [REDACTED] re: approach to files and investigative prioritization debtor-related documents.	1.0
L. Snow	Internal meeting with B. Ebert, [REDACTED], J. Bass, and H. Looney re: approach to files and investigative prioritization debtor-related documents.	1.0
[REDACTED]	Internal meeting with B. Ebert, L. Snow, J. Bass, and H. Looney re: approach to files and investigative prioritization debtor-related documents.	1.0
<b>Total</b>		<b>5.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Internal coordination with L. Snow and J. Bass on the status of the sale of the property and of Sotheby's retention.	0.5
J. Bass	Internal coordination with L. Snow and B. Ebert on the status of the sale of the property and of Sotheby's retention.	0.5

L. Snow	Internal coordination with J. Bass and B. Ebert on the status of the sale of the property and of Sotheby's retention.	0.5
<b>Total</b>		<b>1.5</b>

**May 22, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly GDR Meeting.	0.5
H. Looney	Weekly GDR Meeting.	0.5
J. Bass	Weekly GDR Meeting.	0.5
L. Snow	Weekly GDR Meeting.	0.5
P. Orphanos	Weekly GDR Meeting.	0.5
[REDACTED]	Weekly GDR Meeting.	0.5
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with H. Looney to update monthly invoice.	1.0
H. Looney	Meeting with B. Ebert to update monthly invoice.	1.0
<b>Total</b>		<b>2.0</b>

**May 23, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	GDR/Akin weekly call.	0.5
J. Bass	Weekly Akin meeting.	0.5
L. Snow	Weekly Akin Meeting.	0.5
P. Orphanos	Weekly Akin Meeting.	0.5



<b>Total</b>		<b>2.0</b>
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<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Coordination with P. Orphanos re: source of income to debtor.	0.5
P. Orphanos	Coordination with B. Ebert re: source of income to debtor.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
J. P. Bass	Assist [REDACTED] in auditing financial statements.	0.5
[REDACTED]	Analysis of financial statement with assistance from J. P. Bass.	0.5
<b>Total</b>		<b>1.0</b>

**May 24, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly UCC meeting.	0.5
J. Bass	Weekly UCC meeting.	0.5
L. Snow	Weekly UCC meeting.	0.5
<b>Total</b>		<b>1.5</b>

**May 28, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Call with J. Bass re: former associate of the Debtor interview.	1.0
J. Bass	Call with B. Ebert re: former associate of the Debtor interview.	1.0

<b>Total</b>		<b>2.0</b>
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<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Logistics meeting with counsel of former associate of Debtor.	1.0
J. Bass	Logistics meeting with counsel of former associate of Debtor.	1.0
<b>Total</b>		<b>2.0</b>

**May 29, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly GDR Meeting.	0.5
J. Bass	Weekly GDR Meeting.	0.5
L. Snow	Weekly GDR Meeting.	0.5
P. Orphanos	Weekly GDR Meeting.	0.5
[REDACTED]	Weekly GDR Meeting.	0.5
<b>Total</b>		<b>2.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with L. Snow, D. Hill and J. Latov re: financial summary presentation for UCC.	0.5
L. Snow	Meeting with L. Snow, D. Hill and J. Latov re: financial summary presentation for UCC.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Preparation for interview with the former associate of Debtor.	2.0

J. Bass	Preparation for interview with the former associate of Debtor.	1.0
<b>Total</b>		<b>3.0</b>

**May 30, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Interview with former associate of Debtor re Debtor and assets.	4.0
J. Bass	Interview with former associate of Debtor re Debtor and assets.	4.0
<b>Total</b>		<b>8.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Prep for interview of former associate of the Debtor with J. Bass.	3.0
J. Bass	Prep for interview of former associate of the Debtor with B. Ebert.	3.0
<b>Total</b>		<b>6.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	TRAVEL TIME to and from DC to West Palm Beach (actual: 7 hours).	3.50
J. Bass	TRAVEL TIME to and from DC to West Palm Beach (actual: 7 hours).	3.50
<b>Total</b>		<b>7.0</b>

**June 3, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with J. Bass re: review of emails provided by associates of Debtor.	0.5

J. Bass	Meeting with B. Ebert re: review of emails provided by associates of Debtor.	0.5
<b>Total</b>		<b>1.0</b>

**June 5, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with L. Snow re: debtor owned charity & financial analysis.	0.5
L. Snow	Meeting with B. Ebert re: debtor owned charity & financial analysis.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Call with M. O’Dea re: debtor owned charity & other investigative leads.	0.5
M. O’Dea	Call with B. Ebert re: debtor owned charity & other investigative leads.	0.5
<b>Total</b>		<b>1.0</b>

**June 6, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meet with H. Looney re: April team hours.	0.5
H. Looney	Meet with B. Ebert re: April team hours.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly call with Akin.	0.5
E. Laykin	Weekly call with Akin.	0.5
J. Bass	Weekly call with Akin.	0.5

L. Snow	Weekly call with Akin.	0.5
<b>Total</b>		<b>2.0</b>

**June 7, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly UCC meeting.	1.0
J. Bass	Weekly UCC meeting.	1.0
L. Snow	Weekly UCC meeting.	1.0
<b>Total</b>		<b>3.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Coordination with J. Bass on remote access to data provided by former associate of the Debtor_ following Akin-Global Data Risk meeting and subsequent UCC meeting.	0.5
J. Bass	Coordination with B. Ebert on remote access to data provided by former associate of the Debtor_ following Akin-Global Data Risk meeting and subsequent UCC meeting.	0.5
<b>Total</b>		<b>1.0</b>

**June 11, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
J. Bass	Call with L. Snow, J. P. Bass, and [REDACTED] re financial findings.	0.5
J. P. Bass	Call with J. Bass, L. Snow, and [REDACTED] re financial findings.	0.5
L. Snow	Call with J. Bass, J. P. Bass, and [REDACTED] re financial findings.	0.5

[REDACTED]	Call with J. Bass, J. P. Bass, and L. Snow re financial findings.	0.5
<b>Total</b>		<b>2.0</b>

**June 12, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly GDR Meeting	0.5
E. Laykin	Weekly GDR Meeting	0.5
H. Looney	Weekly GDR Meeting	0.5
J. Bass	Weekly GDR Meeting	0.5
L. Snow	Weekly GDR Meeting	0.5
[REDACTED]	Weekly GDR Call.	0.5
M. O’Dea	Weekly GDR Meeting.	0.5
P. Orphanos	Weekly GDR Meeting.	0.5
[REDACTED]	Weekly GDR Meeting	0.5
<b>Total</b>		<b>4.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Extended strategy and project management call with J. Bass.	0.5
J. Bass	Extended strategy and project management call with B. Ebert.	0.5
<b>Total</b>		<b>1.0</b>

**June 13, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly call with Akin.	0.5

E. Laykin	Weekly call with Akin.	0.5
J. Bass	Weekly call with Akin.	0.5
L. Snow	Weekly call with Akin.	0.5
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with M. O’Dea re: review of Rule 2004 produced material.	0.5
M. O’Dea	Meeting with B. Ebert re: review of Rule 2004 produced material.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with L. Snow re: financial analysis.	0.5
L. Snow	Meeting with B. Ebert re: financial analysis.	0.5
<b>Total</b>		<b>1.0</b>

**June 14, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly UCC meeting.	0.5
E. Laykin	Weekly UCC meeting.	0.5
J. Bass	Weekly UCC meeting.	0.5
L. Snow	Weekly UCC meeting.	0.5
<b>Total</b>		<b>2.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
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B. Ebert	Report preparation with J. Bass and E. Laykin for UCC Meeting.	0.5
E. Laykin	Report preparation with J. Bass and B. Ebert for UCC Meeting.	0.5
J. Bass	Report preparation with E. Laykin and B. Ebert for UCC Meeting.	0.5
<b>Total</b>		<b>1.5</b>

**June 17, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Attendance in Hearing re Appointment of Trustee.	4.0
E. Laykin	Attendance in Hearing re Appointment of Trustee.	4.0
J. Bass	Attendance in Hearing re Appointment of Trustee.	4.0
L. Snow	Attendance in Hearing re Appointment of Trustee (partial).	1.0
<b>Total</b>		<b>13.0</b>

**June 18, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Strategic call with J. Bass re Hearing.	0.5
J. Bass	Strategic call with B. Ebert re Hearing.	0.5
<b>Total</b>		<b>1.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Call with M. O’Dea re: research of person of interest related to Debtor.	0.5
M. O’Dea	Call with B. Ebert re: Huvane research.	0.5



<b>Total</b>		<b>1.0</b>
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<b>Name</b>	<b>Notes</b>	<b>Hours</b>
L. Snow	Meeting with M. O’Dea re Rule 2004 produced materials and debtor filings.	0.5
M. O’Dea	Meeting with L. Snow re Rule 2004 produced materials and debtor filings.	0.5
<b>Total</b>		<b>1.0</b>

**June 19, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly GDR Call.	0.5
E. Laykin	Weekly GDR Call.	0.5
H. Looney	Weekly GDR Call.	0.5
J. Bass	Weekly GDR Call.	0.5
[REDACTED]	Weekly GDR Call.	0.5
M. O’Dea	Weekly GDR Call.	0.5
P. Orphanos	Weekly GDR Call.	0.5
[REDACTED]	Weekly GDR Call.	0.5
[REDACTED]	Weekly GDR Call.	0.5
<b>Total</b>		<b>4.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meet with J. Bass re investigative strategy on Associate of Debtor.	0.5
J. Bass	Meet with B. Ebert re investigative strategy on Associate of Debtor.	0.5

<b>Total</b>		<b>1.0</b>
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**June 20, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly call with Akin.	0.5
E. Laykin	Weekly call with Akin.	0.5
J. Bass	Weekly call with Akin.	0.5
L. Snow	Weekly call with Akin.	0.5
<b>Total</b>		<b>2.0</b>

**June 26, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly GDR Call.	0.5
E. Laykin	Weekly GDR Call.	0.5
H. Looney	Weekly GDR Call.	0.5
J. Bass	Weekly GDR Call.	0.5
L. Snow	Weekly GDR Call.	0.5
[REDACTED]	Weekly GDR Call.	0.5
[REDACTED]	Weekly GDR Call.	0.5
M. O'Dea	Weekly GDR Call.	0.5
P. Orphanos	Weekly GDR Call.	0.5
[REDACTED]	Weekly GDR Call.	0.5
<b>Total</b>		<b>5.0</b>

**June 27, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
J. Bass	Weekly call with Akin.	1.0

L. Snow	Weekly call with Akin.	1.0
<b>Total</b>		<b>2.0</b>

**July 2, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with J. Bass to discuss service in Florida, latest filings and plans with Akin.	0.5
J. Bass	Meeting with B. Ebert to discuss service matters, latest filings and plans with Akin.	0.5
<b>Total</b>		<b>1.0</b>

**July 3, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Attend emergency court hearing.	1.5
E. Laykin	Participation in emergency hearing with court.	1.5
J. Bass	Participation in emergency hearing with court.	1.5
<b>Total</b>		<b>4.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Weekly GDR meeting.	0.5
E. Laykin	Weekly GDR meeting.	0.5
H. Looney	Weekly GDR meeting.	0.5
J. Bass	Weekly GDR meeting.	0.5
L. Snow	Weekly GDR meeting.	0.5
[REDACTED]	Weekly GDR meeting.	0.5
M. O'Dea	Weekly GDR meeting.	0.5
P. Orphanos	Weekly GDR meeting.	0.5

[REDACTED]	Weekly GDR meeting.	0.5
<b>Total</b>		<b>4.5</b>

**July 9, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting re: July 10 hearing.	0.5
E. Laykin	Meeting re: July 10 hearing.	0.5
J. Bass	Meeting re: July 10 hearing.	0.5
<b>Total</b>		<b>1.5</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
E. Laykin	Strategy discussions with J. Bass in advance of hearing re/trustee.	1.0
J. Bass	Strategy discussions with E. Laykin in advance of hearing re dismissal/trustee.	1.0
<b>Total</b>		<b>2.0</b>

**July 10, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Attend status hearing.	1.5
E. Laykin	Attend status hearing.	1.5
J. Bass	Participation in status hearing.	1.5
L. Snow	Participation in status hearing.	1.5
<b>Total</b>		<b>6.0</b>

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Coordination with J. Bass re hearing on dismissal of bankruptcy.	1.0

J. Bass	Coordination with B. Ebert re hearing on dismissal of bankruptcy.	1.0
<b>Total</b>		<b>2.0</b>

**July 11, 2024**

<b>Name</b>	<b>Notes</b>	<b>Hours</b>
B. Ebert	Meeting with J. Bass re case dismissal.	1.0
J. Bass	Meeting with B. Ebert re case dismissal.	1.0
<b>Total</b>		<b>2.0</b>

20. The above cited entries indicate timekeepers would each individually bill for the same respective event. Such time tracking is duplicative as it essentially charges twice for the same task. *See Seigal v. Merrick*, 1979 U.S. Dist. LEXIS 12744 (finding certain fees to be duplicative wherein the applicants charged for work done by two attorneys when only one was necessary). *See also In re Navis Realty*, 126 B.R. 137 (finding only one attorney may charge for an intra-office conference absent any explanation as to each attorney’s participation).

21. Permitting Applicants to claim the full amount requested, when their entries demonstrate a clear practice of duplicative billing would not be adjacent with the aims of this Court. “One of the most pressing concerns in awarding professional fees in bankruptcy is to avoid compensating for duplication of services.” *In re Ferkauf, Inc.*, 42 B.R.852 (1984). *See also Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714,(5th Cir. 1974); *Matter of J. J. Bradley & Co. Inc.*, 6 B.R. 529, 6 B.C.D. 1109, 2 C.B.C.2d 1245, 1254 (Bankr. E.D.N.Y. 1980).

22. As such, it is proposed that the fee be amended and reduced to \$77, 275.00.

23. This amount reflects a total of 281 hours of work. This was calculated by taking each respective duplicative time entry billed and reducing it so as to only account for one

timekeeper per task. In the event that different timekeepers billed different times for the same task, the higher entry was kept, and the remaining timekeepers' entries forgone.

24. In the alternative, it is respectfully requested that the fee be reduced by a flat percentage. *See Ferkauf* (finding 5% of the total hours recorded by counsel for the trustee be discounted due to the duplication of one another's work in having two attorneys perform a single task).

**II. The Fees Sought Are Unreasonable and/or Inadequate**

25. In assessing an application for fees, the Court is to consider the nature, extent, and the value of such services, and in doing so, take into account the time spent on such services, whether such services were necessary or beneficial, and whether the services were performed within a reasonable amount of time given the complexity, importance, and nature of the task addressed. 11 U.S.C. §330(a)(3).

26. Several fees sought by GDR, incurred during a five-month span, are overstated, unreasonable, and excessive. However, for purposes of this immediate opposition, the Court is directed to the time entries indicating over 270.5 hours of research and chronology performed in relation to this matter.

27. Specifically, this Court is directed to the following time entries within *GDR's Exhibit E*:

<b>Date</b>	<b>Name</b>	<b>Notes</b>	<b>Hours</b>
2/9/2024	S. Ditto	Giuliani research on foreign/security business per J. Bass tasking.	8.5
2/9/2024	S. Ditto	Editing of research report.	0.5
2/16/2024	S. Ditto	Drafting of research report based on open source information.	10.0

2/17/2024	S. Ditto	Drafting of Giuliani research product based on open source research.	10.0
2/18/2024	S. Ditto	Research to expand on new information for Giuliani report product.	10.0
2/19/2024	S. Ditto	Additional research for Giuliani research report.	7.0
2/23/2024	S. Ditto	“ . . . Research in connection with matter investigation (1.5).”	1.5
2/28/2024	S. Ditto	Research re: known associates.	4.0
3/1/2024	S. Ditto	Research on personal background of interview subject.	4.0
3/2/2024	S. Ditto	Research on professional background of interview subject.	3.0
3/4/2024	S. Ditto	General background research on known associate in preparation for interview.	4.0
3/5/2024	S. Ditto	“Follow on research for interview preparation (3); research on interview subject’s professional associations (4) . . .”	7.0
3/6/2024	S. Ditto	Research regarding interview subject (7); research regarding potential future interview subjects (1).	8.0
3/7/2024	S. Ditto	“Research into interview (7) . . .”	7.0
<b>Total Hours Spent on Services Related to Solely Research</b>			<b>84.5</b>

<b>Date</b>	<b>Name</b>	<b>Notes</b>	<b>Hours</b>
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3/7/2024	[REDACTED]	Joint ventures formation research for investigation into debtor assets (3.5); cross-analysis of publicly available resources and debtor-related documents re joint ventures (3); drafting report re same (2).	8.5
3/8/2024	[REDACTED]	Research on joint ventures formation re debtor assets (3), known associates of debtor (3), and associated companies (2); report drafting re same (1.5).	9.5
3/10/2024	[REDACTED]	Research on joint ventures formation.	3.0
3/11/2024	[REDACTED]	Conduct open source research in connection with investigation of debtor financial information (4) and drafting report re same (2).	6.0
3/11/2024	[REDACTED]	Drafting of open source research report.	2.0
3/12/2024	[REDACTED]	Review of joint ventures formation research and discussion with [REDACTED] regarding recommendations.	2.0
3/14/2024	[REDACTED]	Research into various associates of the debtor (6); draft materials re same (2).	8.0
3/15/2024	[REDACTED]	Research into known associates of debtor (6); drafting of biographies and associations re same (2).	8.0
3/15/2024	[REDACTED]	Coordination with J. Bass of research efforts.	1.0
3/19/2024	[REDACTED]	Discussion with J. Bass re open source research.	0.5



3/22/2024	[REDACTED]	Continued research taskings.	1.0
4/23/2024	[REDACTED]	Conduct address verification research (5.0). Review of address research with [REDACTED] (1.0).	6.0
4/23/2024	[REDACTED]	Review of research re address verification with [REDACTED].	1.0
5/17/2024	[REDACTED]	Research around asset tracing leads linked to foreign jurisdictions.	4.0
5/17/2024	[REDACTED]	Review of research regarding potential leads in foreign jurisdictions on the Subject.	0.5
5/31/2024	[REDACTED]	Distribution of research materials for support team.	1.0
6/11/2024	[REDACTED]	Research re Associate of Debtor.	2.0
<b>Total Hours Spent on Services Related to Solely Research</b>			<b>64</b>

<b>Date</b>	<b>Name</b>	<b>Notes</b>	<b>Hours</b>
2/19/2024	M. O'Dea	Research for timeline report on debtor (5); analysis (3) and production of timeline deliverable (3.5).	12.5
2/20/2024	M. O'Dea	Research collection from publicly available sources for timeline report.	3.5
2/21/2024	M. O'Dea	Chronology tasking on Subject; analysis and production of chronology deliverable.	2.0
2/22/2024	M. O'Dea	Analysis and production of chronology deliverable.	2.0

2/23/2024	M. O'Dea	Analysis (2) and production (1) of timeline deliverable.	3.0
2/26/2024	M. O'Dea	Integration of research into timeline report.	4.0
2/27/2024	M. O'Dea	Research of publicly available data re debtor associations.	3.0
2/28/2024	M. O'Dea	Chronology tasking on Subject (0.5); open source research (1.0).	1.5
2/29/2024	M. O'Dea	Chronology tasking on Subject (1.0); open source research (1.0).	2.0
3/1/2024	M. O'Dea	Media research re location and identification of debtor assets.	3.0
3/4/24	M. O'Dea	Chronology tasking on Subject.	1.0
3/5/24	M. O'Dea	Continue to prepare chronology on Subject.	1.5
3/6/24	M. O'Dea	"Prepare . . . and chronology on Subject (1.5)."	1.5
3/7/24	M. O'Dea	Continue to work on chronology on Subject.	3.0
3/8/24	M. O'Dea	Continued work on debtor timeline report (1.0); drafting report re same (.5).	1.5
3/11/24	M. O'Dea	Further conduct data management and chronology on Subject.	2.5
3/12/24	M. O'Dea	Research on Subject.	1.5
3/12/24	M. O'Dea	Chronology tasking and reporting on Subject.	2.0
3/13/24	M. O'Dea	Conduct chronology on Subject, analysis and reporting.	3.0

3/14/24	M. O'Dea	Chronology on Subject.	1.5
3/15/24	M. O'Dea	Chronology on Subject.	2.0
3/16/24	M. O'Dea	Data integration related to chronology and open-source products.	3.0
3/18/24	M. O'Dea	Chronology on Subject.	2.0
3/19/24	M. O'Dea	Further prepare chronology on Subject.	1.0
3/20/24	M. O'Dea	Chronology on Subject.	2.5
3/23/24	M. O'Dea	Continue chronology on Subject.	1.0
3/25/24	M. O'Dea	Continue chronology on Subject.	0.5
3/26/24	M. O'Dea	Continue chronology on Subject.	2.0
3/27/24	M. O'Dea	Research on Subject.	2.0
3/27/24	M. O'Dea	Continue research of chronology on Subject.	1.0
3/28/24	M. O'Dea	Continue to conduct chronology on Subject.	1.5
4/1/24	M. O'Dea	Draft chronology on Subject (0.5); conduct open source research.	1.0
4/2/24	M. O'Dea	Drafting of timeline report (1.0); structured timeline data analysis (1.5).	2.5
4/3/24	M. O'Dea	Drafting of timeline report (1.0); structured timeline data analysis (1.5).	2.5

4/4/24	M. O'Dea	Drafting of timeline report (0.5); structured timeline data analysis (0.5).	1.0
4/5/24	M. O'Dea	Drafting of timeline report (1.0); structured timeline data analysis (1.5).	2.5
4/8/24	M. O'Dea	Research (1.5) and drafting of report (1.0) on persons of interest related to debtor.	2.5
4/9/24	M. O'Dea	Research (1.5) and drafting of report (1.0) on persons of interest related to debtor.	2.5
4/10/24	M. O'Dea	"Research (2.0) and production of deliverable on persons of interest (1.5). . ."	3.5
4/11/24	M. O'Dea	Research (2.0) and analysis (1.0) related to persons of interest.	3.0
4/11/24	M. O'Dea	"Deliverable production related to persons of interest (3.0). . ."	3.0
4/12/24	M. O'Dea	Analysis related to persons of interest.	2.0
4/17/24	M. O'Dea	Drafting of report re structured data on persons of interest.	1.5
4/19/24	M. O'Dea	Research on persons of interest.	3.5
4/21/24	M. O'Dea	Report drafting on persons of interest.	2.5
4/23/24	M. O'Dea	Timeline research (0.5) and analysis (1.5).	2.0
4/24/24	M. O'Dea	Drafting of timeline report.	1.5

5/1/24	M. O'Dea	Investigating individuals of interest.	1.0
5/2/24	M. O'Dea	Investigation into 5 individuals of interest.	5.0
7/3/24	M. O'Dea	Investigation into information related to communications received by Akin.	3.0
7/5/24	M. O'Dea	Report production re person of interest related to debtor.	1.0
<b>Total Hours Spent on Research/Chronology</b>			<b>122</b>

28. The above cited entries accumulate to: 84.5 hours of research related services by S. Ditto; 64 hours of research related services by [REDACTED](although it is noted that there is more than one redacted employee, our assertion remains that the amount of time spent on research is excessive even if representing two or three employees); and 122 hours of research related services by M. O'Dea. This comes out to a sum of 270.5 hours in total for all, or \$74,387.50 for a five-month span.

29. With consideration of the nature and complexity of this matter, the short-term duration of GDR's assignment to this matter is noted. Five months for 270.5 hours of research for one debtor, often repetitive, seems to be inflated, if not excessive.

### CONCLUSION

30. Whether by duplicative billing or excessive/unreasonable amount of time spent on research and chronology, GDR fees are unnecessarily excessive and should be reduced.

31. GDR billed a total of 1,181.25 hours over the course of five months. To put this into context, there are approximately 2,080 hours in a calendar year, accounting for an employee working a traditional 40 hour work week.

32. The Court has previously determined that any uncertainties in a compensation request due to inadequate entries or due to poor record keeping are to be resolved against the applicant. *See In re Poseidon Pools of America*, 216 B.R. 98 (E.D.N.Y. 1997).

33. As such, it is the Debtor's position that the fees requested by GDR are duplicative and excessive, and should be reduced by this Court.

**WHEREFORE**, it is respectfully requested that the Court reduce the fees requested by GDR by \$151,662.50, representative of the total sum of \$77,275.00 overbilled due to duplicative time entries and \$74,387.50 of excessive research related services, together with such other, further, and different relief as this Court deems just, proper, and equitable.

Dated: Syosset, New York  
September 11, 2024

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