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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV001
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - General Case Administration

Terms: Net 30 days

For Services Rendered from 09/13/2019 Through 09/28/2020

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
9/13/2019	RSB	Conference with client pre-filing	550.00	0.90	495.00
9/13/2019	RSB	Track down and call counsel for EDA	550.00	0.30	165.00
9/13/2019	RSB	Additional research on UCC filings	550.00	0.30	165.00
9/13/2019	SEW	Preparing first day motions, research regarding claims, and trade e-mail messages with Robert Bernstein, Christina Wirick, and Mark Lindsay regarding case details in preparation for emergency filing	175.00	2.90	507.50
9/13/2019	SEW	Conference call with client, Robert Bernstein and Christina Wirick	175.00	0.80	140.00
9/14/2019	RSB	Review documents from client, note garnishment and possible effects	550.00	0.10	55.00
9/15/2019	SEW	Review emails from Robert Bernstein regarding strategy	175.00	0.10	17.50
9/16/2019	CAB	Receive, review and respond to email from Corporation Services with authorization to proceed with UCC searches	175.00	0.10	17.50
9/16/2019	CNW	Trade e-mail messages with internal team and draft/send email to client team with request for corporate documents, executory contract and any loan documents	155.00	0.30	46.50
9/16/2019	CNW	Review deficiency notice, review operating order, calendar deadlines, send email to internal team	155.00	0.50	77.50
9/16/2019	CNW	Trade e-mail messages with Internal team regarding 341 meeting, initial debtor interview, review request from US Trustee and compare to operating order issued by the Judge, telephone	155.00	0.50	77.50

		call from Lisa at Judge Flatley's chambers regarding initial telephone conference, send email to internal team regarding discrepancies in order and initial conference with Judge			
9/16/2019	MAL	Review filed Petition, various discussions and emails regarding same	340.00	1.00	340.00
9/16/2019	RSB	Receive, review and respond to emails from US Trustee on scheduling	550.00	0.30	165.00
9/16/2019	RSB	Additional research on corporate structure and executory contracts	550.00	1.00	550.00
9/16/2019	SEW	Review all emails from Robert Bernstein and Mark Lindsay regarding strategy and assignment and review email correspondences between Robert Bernstein and the client	175.00	0.40	70.00
9/17/2019	CAB	Receive then review acknowledgment from Corporation Services Company regarding UCC search orders	175.00	0.10	17.50
9/17/2019	CAB	Receive then review email from Corporation Services with partial results of UCC debtor searches in Delaware	175.00	0.20	35.00
9/17/2019	CAB	Receive, review and respond to email from Sarah Wenrich regarding UCC search results, receive and review search results, send email to Corporation Services regarding problem accessing order results	175.00	0.40	70.00
9/17/2019	CAB	Receive, review and respond to email from Corporation Services regarding UCC searches	175.00	0.10	17.50
9/17/2019	CAB	Receive then review reports with UCC search results	175.00	0.30	52.50
9/17/2019	CNW	Open fee application files	155.00	0.30	46.50
9/17/2019	CNW	Review 341 notice and order setting status conference, send email to internal team with update and deadlines regarding the same	155.00	0.20	31.00
9/17/2019	MAL	Review Petition, docket and related initial documentation and consider next steps	340.00	2.00	680.00
9/17/2019	RSB	Prepare client for IDI and make requests related to Monday court call	550.00	0.70	385.00
9/17/2019	SEW	Review Delaware UCC search reports for the Panthera Entities and email Robert Bernstein and Mark Lindsay regarding reports	175.00	1.10	192.50
9/18/2019	CAB	Receive, review and respond to email from Christina Wirick regarding TENX Group searches, place search orders	175.00	0.50	87.50
9/18/2019	CAB	Receive, review and respond to email from Corporation Services cost estimate for Delaware and West Virginia searches	175.00	0.10	17.50
9/18/2019	CNW	Meeting with internal team to discuss case and initial requirements of the Court, as well as strategy moving forward	155.00	1.00	155.00
9/18/2019	CNW	Plan and prepare for internal meeting	155.00	0.20	31.00
9/18/2019	CNW	Initial review of secured lender documents from	155.00	0.30	46.50

		client			
9/18/2019	CNW	Review and organize secured loan document and secured creditor information received from the client	155.00	2.50	387.50
9/18/2019	CNW	Transfer secured creditor documents to the electronic file, update internal team	155.00	0.50	77.50
9/18/2019	MAL	Internal group meeting regarding status and strategy, telephone call with Robert Bernstein and client regarding same, initial review of various contract documents and various correspondence regarding ongoing case matters	340.00	4.50	1,530.00
9/18/2019	RSB	Meet with staff to review and assign tasks	550.00	1.00	550.00
9/18/2019	RSB	Prepare for and conduct call with client for review and preparation for IDI and conference with court	550.00	1.50	825.00
9/18/2019	SEW	Internal meeting with Robert Bernstein, Mark Lindsay, and Christina Wirick regarding ongoing assignments and strategy moving forward	175.00	1.00	175.00
9/19/2019	CAB	Receive then review results of Delaware UCC search for TENX GROUP LLC	175.00	0.10	17.50
9/19/2019	CNW	Receive then review email from client with completed questionnaire, discuss the same with Sarah Wenrich	155.00	0.30	46.50
9/19/2019	MAL	Review various correspondence and meetings regarding status and strategy	340.00	2.00	680.00
9/19/2019	RSB	Prepare for and attend the Initial Debtor Interview	550.00	1.00	550.00
9/19/2019	SEW	Review UCC research and trade e-mail messages with Robert Bernstein regarding such research	175.00	0.60	105.00
9/20/2019	MAL	Review and analyze various contracts, subcontracts and property lease and consider questions, issues, etc	340.00	3.00	1,020.00
9/20/2019	MAL	Research regarding contract and lease rejection issues and implications	340.00	2.00	680.00
9/23/2019	MAL	Initial status conference with Judge Flatley	340.00	0.50	170.00
9/23/2019	MAL	Review petition and financial information and various other items in preparation for initial conference with Judge Flatley	340.00	1.00	340.00
9/23/2019	RSB	Prepare for and attend Status Conference	550.00	0.50	275.00
9/24/2019	MAL	Various conferences and telephone calls regarding status and strategy and preparation of draft schedules	340.00	2.50	850.00
9/25/2019	MAL	Various group meetings and correspondence regarding scheduling, status and case strategy	340.00	1.50	510.00
9/25/2019	RSB	Conference with Mark Lindsay, Sarah Wenrich, and Christina Wirick regarding task assignments and progress	550.00	0.50	275.00
9/25/2019	RSB	Receive then review emails and voice message from Debra Allen regarding valuations	550.00	0.10	55.00
9/25/2019	SEW	Meeting with Robert Bernstein, Mark Lindsay, and Christina Wirick regarding case updates, strategy, and next steps	175.00	0.70	122.50

9/26/2019	MAL	Various correspondence and discussion regarding modular building sales agreement and schedules of same	340.00	1.00	340.00
9/26/2019	SEW	Review and analysis of Delaware UCC filings for TenX	175.00	0.50	87.50
9/30/2019	MAL	Review contract default information and correspondence and consider strategy for responses to subcontract party and issues for action regarding DEA contract violations and interference	340.00	2.00	680.00
9/30/2019	SEW	Research garnishments as a violation of the automatic stay then draft and Proofread/revise letter to counsel for West Virginia Paving, Inc	175.00	2.20	385.00
10/1/2019	SEW	Final review of letter notifying garnishment creditor of bankruptcy	175.00	0.20	35.00
10/2/2019	MAL	Continuing review and analysis of potential legal issues and consideration of reorganization plan strategy	340.00	3.00	1,020.00
10/9/2019	MAL	Review correspondence from PT's counsel regarding subcontract and consider issues regarding same	340.00	0.50	170.00
10/15/2019	SEW	Review email from US Trustee regarding bank accounts, review file for necessary information, trade e-mail messages with client regarding missing information relating to the bank accounts, and trade e-mail messages with US Trustee regarding updated bank account information	175.00	1.10	192.50
10/18/2019	MAL	Travel to and from Martinsburg, WV and attend 341 meeting with debtor representative	340.00	8.50	2,890.00
10/21/2019	MAL	Review notes from 341 meeting, consider additional US Trustee requests and review available documents.	340.00	1.00	340.00
10/25/2019	JJR	Review emails regarding Trustee's requests for documents from Panthera Enterprises	310.00	0.30	93.00
10/28/2019	MAL	Begin review of various documents and correspondence regarding UST requests for information	340.00	0.50	170.00
10/29/2019	MAL	Review various debtor documents and statements and prepare responses to UST inquiries, and various correspondence with debtor regarding same	340.00	3.00	1,020.00
10/29/2019	SEW	Discuss status of various motions with Mark Lindsay and review emails between Mark Lindsay and Jamese Punelli regarding requested information	175.00	0.40	70.00
10/30/2019	MAL	Revise and finalize responses to UST inquiries, various correspondence and discussions with client regarding same	340.00	2.50	850.00
11/1/2019	CNW	Review emails from client, draft response to US Trustee regarding bank accounts, Timber Agreement, property transaction info, A/R and non-publicly traded entities, etc., send email with responses and documents to US Trustee	155.00	0.50	77.50

11/5/2019	CNW	Telephonce call with Court regarding procedure related to motion to dismiss, send update to the internal team	155.00	0.30	46.50
12/31/2019	MAL	Review and address issues regarding outstanding issued task orders, and various correspondence regarding same	340.00	2.00	680.00
2/12/2020	MAL	Review and consider request Panthera Training regarding building armory structure on property, discussions with J. Punelli regarding same	350.00	1.00	350.00
2/25/2020	CNW	Receive then review email from client regarding US Trustee invoices, review filed petition to determine mailing address, send email to UST requesting that quarterly invoices be sent to the Virginia mailing address	175.00	0.30	52.50
2/26/2020	SMK	Review pleading in the case and confer with Mark Lindsay regarding same, emails to possible lenders regarding same	325.00	2.10	682.50
7/23/2020	CNW	Receive then review Order Converting Case to Chapter 7, discuss the same with Mark Lindsay and update the file	175.00	0.60	105.00
7/27/2020	MAL	Prepare for and telephone call with Aaron Amore, Chapter 7 trustee, regarding case background and outstanding issues	350.00	2.00	700.00
7/30/2020	MAL	E-mails with Chapter 7 trustee regarding status and reporting	350.00	0.40	140.00
7/31/2020	MAL	Prepare for telephone call with Chapter 7 trustee and J. Punelli and R. Jones regarding various operational issues and transition	350.00	2.00	700.00
7/31/2020	MAL	E-mails with J. Punelli and R. Jones regarding documents to be provided to trustee and reporting of any post-petition debts	350.00	0.50	175.00
8/4/2020	CNW	Receive then review e-mail from client with various documents and explanations that need turned over to the Trustee, send e-mail to Mark Lindsay regarding the same	175.00	0.20	35.00
8/4/2020	MAL	Various correspondence regarding trustee's inquiries and production of documents to trustee	350.00	1.00	350.00
8/6/2020	CNW	Create Bluestylus account as per instructions from US Trustee, review portal information and instructions on uploading documents, upload voluminous amount of documents from the Debtor, as requested by the Trustee	175.00	2.00	350.00
8/7/2020	CNW	Receive then review e-mail from Trustee with additional document request, submit request to client, receive then review e-mail from client wtih login information for website and e-mail accounts, send e-mail to Trustee regarding the same	175.00	0.30	52.50
8/7/2020	CNW	Receive then review e-mail from client with Panthera Mission documents, send the same to the Trustee	175.00	0.20	35.00
8/7/2020	CNW	Trade e-mail messages with Trustee regarding letter from House Subcommittee, send e-mail to client regarding the same	175.00	0.20	35.00

8/7/2020	CNW	Trade e-mail messages with Trustee and client regarding additional information and documents needed	175.00	0.20	35.00
8/10/2020	CNW	Trade e-mail messages with Trustee and client regarding final production of documents and timeline for the same	175.00	0.20	35.00
8/11/2020	CNW	Receive then review e-mail from client with additional requested documents for the US Trustee, forward the same to the US Trustee	175.00	0.20	35.00
8/11/2020	CNW	Receive then review e-mail from Trustee requesting missing e-mail attachments, send e-mail to client requesting the same	175.00	0.20	35.00
8/18/2020	CNW	Discuss final report wtih Mark Lindsay, send e-mail to District Court regarding mediation, update Trustee regarding the same	175.00	0.30	52.50
8/20/2020	CNW	Review comments & suggested revisions to the Final Report, revise Final Report and send to Mark Lindsay for final review	175.00	0.50	87.50
8/20/2020	MAL	Review and finalize Rule 2019 Report for filing	350.00	1.00	350.00
8/24/2020	MAL	Various correspondence with debtor and trustee regarding status of tax returns and certain claims against estate	350.00	0.50	175.00
9/10/2020	MAL	Prepare for and attend 341 examination of Chapter 7 debtor representative, J. Punelli	350.00	2.50	875.00
9/28/2020	MAL	Telephone call with Chapter 7 Trustee and J. Nash regarding action against Panthera Training Center, review complaint and related documents	350.00	1.00	350.00
		TOTAL SERVICES RENDERED		93.20	28,935.00

TIMEKEEPER SUMMARY

Cheryl A. Bauer	1.90	HRS @ $	175.00/hr =	332.50
Robert S. Bernstein	8.20	HRS @ $	550.00/hr =	4,510.00
Salene Mazur Kraemer	2.10	HRS @ $	325.00/hr =	682.50
Mark A. Lindsay	44.00	HRS @ $	340.00/hr =	14,960.00
Mark A. Lindsay	11.90	HRS @ $	350.00/hr =	4,165.00
John J. Richardson	0.30	HRS @ $	310.00/hr =	93.00
Sarah E. Wenrich	12.00	HRS @ $	175.00/hr =	2,100.00
Christina N. Wirick	7.40	HRS @ $	155.00/hr =	1,147.00
Christina N. Wirick	5.40	HRS @ $	175.00/hr =	945.00
Totals	93.20		$	28,935.00

COSTS ADVANCED

DATE	DESCRIPTION	AMOUNT
9/16/2019	Disbursed to Bankruptcy Court- file Chapter 11 Petition	1,717.00
9/18/2019	Disbursed to CSC - Delaware UCC searches	450.00
9/23/2019	Disbursed to CSC - New Castle County, DE UCC search	242.00

10/12/2019	Disbursed for monthly conference call(s)	40.99
10/26/2019	Disbursed to Bankruptcy Court	350.00
10/30/2019	Travel Expense - Mark Lindsay travel to/from Martinsburg, WV for US Trustee 341 Meeting	214.00
11/15/2019	Disbursed to LogMeIn October, 2019 conference calls	16.71
11/27/2019	Travel Expense - John Richardson attend Preliminary Injuction Hearing in Wheeling	140.00
11/30/2019	Travel Expense - John Richardson 11/23/19 travel	8.16
12/20/2019	Travel Expense - John Richardson attend evidentiay hearing in Wheeling, WV	50.60
12/22/2019	Travel Expense - Mark Lindsay additional travel expense from November, 2019	144.10
5/19/2020	Disbursed for monthly conference call(s)	22.71
8/19/2020	Disbursed for monthly conference call(s)	40.94
	TOTAL COSTS ADVANCED:	3,437.21

PREVIOUS BALANCE:	9,400.00
CURRENT CHARGES:	32,372.21
LESS PAYMENTS:	9,400.00
TOTAL AMOUNT DUE$	**32,372.21**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV002
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Petition

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
9/13/2019	CNW	Continue drafting schedules, search Lexis for UCC information on the client, discuss cash collateral motion with Sarah Wenrich and UCC information with Sarah Wenrich	155.00	1.20	186.00
9/13/2019	CNW	Organize and finalize final petition documents	155.00	0.60	93.00
9/13/2019	CNW	Telephone call from Robert Bernstein regarding slight change to petition, finalize and file the bankruptcy petition and 20 largest, call to Robert Bernstein regarding deadline to file schedules, send email to client team with filed petition and deadlines	155.00	0.60	93.00
9/13/2019	MAL	Review and analyze UCC filing report and various correspondence regarding same, review Cash Management Motion and various items in preparation for filing petition	340.00	2.50	850.00
9/13/2019	MAL	Review draft petition documents and various supporting information	340.00	1.00	340.00
9/13/2019	RSB	Final review of petition and approval for filing	550.00	0.30	165.00
9/20/2019	CNW	Discuss schedules with Sarah Wenrich	155.00	0.30	46.50
9/20/2019	SEW	Begin reviewing materials for the schedules	175.00	1.90	332.50
9/21/2019	SEW	Continue reviewing questionnaire and updated questionnaire to prepare the schedules	175.00	0.60	105.00
9/22/2019	SEW	Reviewing contracts and claims provided by the client and continue preparing the schedules	175.00	2.10	367.50
9/23/2019	CNW	Discuss inconsistencies in the Debtor questionnaire with Sarah Wenrich	155.00	0.10	15.50

9/23/2019	CNW	Receive then review email from client with revisions to the debtor questionnaire related to schedule G and corresponding agreements	155.00	0.20	31.00
9/23/2019	RSB	Locate list of depositories for client to open new accounts	550.00	0.20	110.00
9/23/2019	SEW	Reviewing contracts and documents and continuing to work on schedules	175.00	3.80	665.00
9/24/2019	RSB	Conference with Sarah Wenrich reviewing schedules progress	550.00	0.50	275.00
9/24/2019	SEW	Discuss petition schedules with Robert Bernstein	175.00	0.50	87.50
9/24/2019	SEW	Continue reviewing pertinent documents and drafting and revising the schedules	175.00	3.20	560.00
9/25/2019	CNW	Meet with Sarah Wenrich to review schedules and organize questions for client	155.00	1.10	170.50
9/25/2019	CNW	Review questions for client and internal team related to schedules, revise the same, begin reviewing draft schedules	155.00	0.60	93.00
9/25/2019	CNW	Continued review of draft schedules, prepare for meeting with internal team to discuss the same	155.00	0.90	139.50
9/25/2019	CNW	Attend meeting with internal team regarding schedules, deadlines, etc. and debrief with Sarah Wenrich regarding tasks	155.00	0.60	93.00
9/25/2019	CNW	Review notes from meeting, draft questions to client requesting missing information, review file to determine loan payoff amounts, gross revenue, etc., revisions to the schedules and SOFA	155.00	1.00	155.00
9/25/2019	CNW	Review the local rules of court and draft a Corporate Ownership statement pursuant to 1007(a)(1) & 7007.1	155.00	0.30	46.50
9/25/2019	SEW	Meeting with Christina Wirick regarding outstanding questions and information for the schedules	175.00	0.90	157.50
9/25/2019	SEW	Continue review of pertinent documents and compiling schedules	175.00	4.10	717.50
9/26/2019	CNW	Discuss revisions to schedules with Sarah Wenrich, receive then review email from client with additional changes, send email to Sarah Wenrich regarding the same	155.00	0.80	124.00
9/26/2019	CNW	Additional revisions to schedules, send to internal team for review	155.00	0.70	108.50
9/26/2019	MAL	Review, analyze and revise draft schedules, various meetings regarding same	340.00	2.00	680.00
9/26/2019	RSB	Review various emails regarding schedules and other required documents	550.00	0.20	110.00
9/26/2019	SEW	Continue drafting schedules based upon information provided by clients and finalize draft of schedules	175.00	1.20	210.00
9/27/2019	CNW	Receive then review revisions from Robert Bernstein, telephone call with Sarah Wenrich to discuss the same, meet with Mark Lindsay to discuss additional items, revisions to schedules	155.00	3.80	589.00

		and SOFA and send to client for review and approval			
9/27/2019	CNW	Receive then review email from client regarding schedules, discuss the same with Mark Lindsay, revise accordingly and finalize and file Amended 20 Largest and Schedules and SOFA wtih the Court	155.00	0.80	124.00
9/27/2019	MAL	Review, revise and finalize schedules and statement of financial affairs, various meetings and correspondence regarding same	340.00	3.00	1,020.00
9/27/2019	RSB	Review draft schedules, outline questions, telephone call with Mark Lindsay regarding modular officers and character, telephone call with Christina Wirick regarding answers to open items	550.00	0.75	412.50
9/27/2019	SEW	Phone call with Christina Wirick regarding revisions to be made to the schedules	175.00	0.60	105.00
10/17/2019	MAL	Review Schedules and various documents in preparation for 341 meeting	340.00	2.50	850.00
11/1/2019	CNW	Review emails from client with co-debtor information, discuss the same with Sarah Wenrich, draft amended Schedule H and send to internal team for review.	155.00	1.00	155.00
11/1/2019	SEW	Discuss schedule amendments with Christina Wirick and review said amendments	175.00	0.30	52.50
		TOTAL SERVICES RENDERED		46.75	10,435.50

TIMEKEEPER SUMMARY

Robert S. Bernstein	1.95	HRS @ $	550.00/hr =	1,072.50
Mark A. Lindsay	11.00	HRS @ $	340.00/hr =	3,740.00
Sarah E. Wenrich	19.20	HRS @ $	175.00/hr =	3,360.00
Christina N. Wirick	14.60	HRS @ $	155.00/hr =	2,263.00
Totals	46.75		$	10,435.50

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	10,435.50
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**10,435.50**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV003
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Cash Collateral

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
9/16/2019	SEW	Continue reviewing and revising cash collateral motion	175.00	1.30	227.50
9/17/2019	SEW	Research regarding cash collateral and the potential need for a motion	175.00	1.70	297.50
9/18/2019	SEW	Research regarding debtor's name change	175.00	0.80	140.00
9/18/2019	SEW	Continue review of UCC documents and research and drafting of a cash collateral motion potentially needed	175.00	1.50	262.50
9/19/2019	RSB	Multiple emails with Sarah Wenrich regarding UCC's and need for Motion	550.00	0.20	110.00
		TOTAL SERVICES RENDERED		5.50	1,037.50

TIMEKEEPER SUMMARY

Robert S. Bernstein	0.20	HRS @ $	550.00/hr =	110.00
Sarah E. Wenrich	5.30	HRS @ $	175.00/hr =	927.50
Totals	5.50		$	1,037.50

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	1,037.50
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**1,037.50**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV004
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - DIP Financing

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
9/25/2019	RSB	Receive then review email from lender, send info to client	550.00	0.20	110.00
3/4/2020	SMK	Call with potential lender regarding financing	325.00	0.20	65.00
3/5/2020	SMK	Call and emails to various parties regarding DIP Financing	325.00	0.30	97.50
3/9/2020	SMK	Call with possible DIP lender	325.00	0.20	65.00
3/9/2020	SMK	Call with potential DIP lenders	325.00	0.90	292.50
		TOTAL SERVICES RENDERED		1.80	630.00

TIMEKEEPER SUMMARY

Robert S. Bernstein	0.20	HRS @ $	550.00/hr =	110.00
Salene Mazur Kraemer	1.60	HRS @ $	325.00/hr =	520.00
Totals	1.80		$	630.00

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	630.00
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**630.00**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV007
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Monthly Operating Reports

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
9/25/2019	CNW	Review guidelines for preparation of the initial report, begin drafting initial report and send update to Robert Bernstein	155.00	0.40	62.00
9/26/2019	CNW	Review draft Initial Operating Report and send to client for review and signature	155.00	0.20	31.00
9/26/2019	RSB	Draft initial Operating Report, for client review	550.00	0.40	220.00
9/30/2019	CNW	Review email from client with signed initial report, finalize and file the same with the Court	155.00	0.30	46.50
10/14/2019	CNW	Review email from client with questions/statement regarding operating report, review and mark-up September operating report, provide comments to Mark Lindsay	155.00	0.50	77.50
10/16/2019	CNW	Review additional information provided by client, revise September operating report accordingly	155.00	0.40	62.00
10/16/2019	SEW	Review monthly operating report and discuss discrepancies with Christina Wirick in preparation of call with client	175.00	0.40	70.00
10/17/2019	CNW	Mark-up September report, send to Mark Lindsay for review and additional comments	155.00	0.40	62.00
10/17/2019	MAL	Review and comment on draft monthly operating report	340.00	0.70	238.00
10/17/2019	SEW	Review emails between Mark Lindsay and James Punelli regarding the Monthly Operating Report	175.00	0.10	17.50
10/21/2019	CNW	Discuss operating report with Mark Lindsay, finalize and send to client for signature	155.00	0.60	93.00
11/13/2019	JJR	Review/analyze Enterprises' monthly operating	310.00	0.30	93.00

		report			
11/19/2019	CNW	Receive then review October operating report and follow up with client regarding the same	155.00	0.60	93.00
11/20/2019	CNW	Finalize monthly operating report and discuss with Mark Lindsay	155.00	0.20	31.00
11/20/2019	CNW	Discuss issues with operating report with Mark Lindsay and work to correct the same	155.00	0.30	46.50
11/20/2019	CNW	Finalize and file monthly operating report	155.00	0.20	31.00
1/20/2020	CNW	Review and mark-up December 2019 operating report, send email to client with question to clarify information	155.00	0.30	46.50
1/21/2020	CNW	Trade e-mail messages with client regarding operating report, finalize report and send back to client for review and signature	155.00	0.40	62.00
1/21/2020	CNW	Receive e-mail message from client with signed operating report, finalize and file the same with the Court	155.00	0.30	46.50
2/25/2020	MAL	Review current and prior monthly operating reports and payments made from Debtor	350.00	0.70	245.00
2/28/2020	CNW	Review and revise December operating report, file the same with the Court	175.00	0.80	140.00
3/20/2020	CNW	Prepare operating report, redact account numbers and send to Mark Lindsay for review	175.00	0.80	140.00
3/20/2020	CNW	Finalize and file February operating report	175.00	0.80	140.00
4/15/2020	CNW	Send e-mail message to client regarding March operating report deadline	175.00	0.10	17.50
4/20/2020	CNW	Receive then review March 2020 operating report, redact account number, send Mark Lindsay email regarding the same	175.00	0.30	52.50
4/20/2020	MAL	Review draft monthly operating report for filing	350.00	0.60	210.00
5/18/2020	CNW	Email to client regarding April operating report	175.00	0.10	17.50
5/20/2020	CNW	Receive then review April operating report, redact account numbers and send to Mark Lindsay for review	175.00	0.50	87.50
6/16/2020	MAL	Review monthly operating reports for filing	350.00	2.00	700.00
6/17/2020	CNW	Finalize and file April and May 2020 operating reports	175.00	0.80	140.00
7/15/2020	CNW	E-mail to client requesting June MOR	175.00	0.10	17.50
7/20/2020	CNW	Receive then review operating report, discuss the same with Mark Lindsay, redact account numbers, organize report and file the same with the Court	175.00	0.60	105.00
7/20/2020	MAL	Review monthly operating report for filing, various discussions confirming details of same	350.00	1.00	350.00
		TOTAL SERVICES RENDERED		16.20	3,791.50

TIMEKEEPER SUMMARY

Robert S. Bernstein	0.40 HRS @ $	550.00/hr =	220.00
Mark A. Lindsay	0.70 HRS @ $	340.00/hr =	238.00

Mark A. Lindsay	4.30	HRS @ $ 350.00/hr =		1,505.00
John J. Richardson	0.30	HRS @ $ 310.00/hr =		93.00
Sarah E. Wenrich	0.50	HRS @ $ 175.00/hr =		87.50
Christina N. Wirick	5.10	HRS @ $ 155.00/hr =		790.50
Christina N. Wirick	4.90	HRS @ $ 175.00/hr =		857.50
Totals	16.20		$	3,791.50

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	3,791.50
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE	**$ 3,791.50**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV008
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Executory Contracts

Terms: Net 30 days

For Services Rendered from 09/17/2019 Through 11/11/2019

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
9/17/2019	MAL	Further review and analysis of outstanding contracts, terms and implications.	340.00	1.50	510.00
9/19/2019	RSB	Trade e-mail messages with client regarding subordination, non-disturbance and attornment agreement	550.00	0.20	110.00
9/20/2019	RSB	Receive and review client emails regarding PT reports and responses, send e-mail message to counsel for PT	550.00	0.20	110.00
9/23/2019	MAL	Review and analyze various contracts and loan and security documents and various internal meetings regarding same	340.00	3.00	1,020.00
9/23/2019	MAL	Research regarding lease and contract rejections and tenant elections under 365(h)	340.00	1.00	340.00
9/23/2019	RSB	Conference with Mark Lindsay regarding training and reconciling contract rights	550.00	1.00	550.00
9/24/2019	RSB	Conference with Jim Punelli and Mark Lindsay regarding contracts	550.00	0.60	330.00
9/24/2019	SEW	Discuss status of various contracts with Mark Lindsay	175.00	0.50	87.50
9/25/2019	MAL	Continuing research and consideration regarding contract and lease rejection issues	340.00	1.50	510.00
9/28/2019	RSB	Review and analyze draft notices of default, email comments to Mark Lindsay and Jim	550.00	0.75	412.50
9/30/2019	RSB	Receive then review emails between Mark Lindsay and client regarding PT violations	550.00	0.20	110.00
10/1/2019	MAL	Research and analysis regarding various	340.00	3.00	1,020.00

		contract/lease and potential assumption or rejection issues			
10/1/2019	RSB	Review and analyze redraft default letters, meet with Mark Lindsay regarding prior defaults	550.00	0.30	165.00
10/1/2019	SEW	Begin drafting motion to reject lease with Panthera Training	175.00	0.50	87.50
10/1/2019	SEW	Reviewing Lease between Panthera Training and Panthera Enterprises and revise letter to reflect termination of lease	175.00	2.40	420.00
10/2/2019	MAL	Review lease documents, correspondence, etc. and revise notice of lease termination	350.00	1.00	350.00
10/2/2019	RSB	Review recent email thread regarding Training LLC	550.00	0.20	110.00
10/3/2019	MAL	Review subcontract documents, correspondence, etc. and draft letter regarding defaults	340.00	1.00	340.00
10/3/2019	SEW	Phone conference with James Punelli and Mark Lindsay regarding lease	175.00	0.60	105.00
10/4/2019	MAL	Review and revise notice of default on subcontract and address various related ongoing issues	340.00	1.50	510.00
10/4/2019	RSB	Review counsel response	550.00	0.20	110.00
10/30/2019	SEW	Research for and draft Motion to reject subcontract	175.00	2.20	385.00
11/4/2019	SEW	Proofread/revise motion to reject subcontract with Panthera Training	175.00	0.40	70.00
11/7/2019	MAL	Review and revise temporary Army task order, various correspondence and discussions regarding same	340.00	1.00	340.00
11/11/2019	MAL	Draft notice of additional lease defaults, review lease provisions and prior correspondence regarding same.	340.00	1.00	340.00
		TOTAL SERVICES RENDERED		25.75	8,442.50

TIMEKEEPER SUMMARY

Robert S. Bernstein	3.65	HRS @ $ 550.00/hr =		2,007.50
Mark A. Lindsay	14.50	HRS @ $ 340.00/hr =		4,930.00
Mark A. Lindsay	1.00	HRS @ $ 350.00/hr =		350.00
Sarah E. Wenrich	6.60	HRS @ $ 175.00/hr =		1,155.00
Totals	25.75		$	8,442.50

PREVIOUS BALANCE:	680.00
CURRENT CHARGES:	8,442.50
LESS PAYMENTS:	680.00
TOTAL AMOUNT DUE$	**8,442.50**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV011
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Conference with Client

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
9/13/2019	CNW	Telephone call conference with client team and internal team to discuss strategy of case moving forward, follow-up email to internal team with final petition to be filed	155.00	0.90	139.50
10/3/2019	MAL	Telephone call with Jim Punelli regarding status and strategy and review and revise letter to tenant regarding pre-petition lease defaults and lease termination	340.00	1.50	510.00
10/16/2019	CNW	Prepare for and attend conference call with client and client team	155.00	1.10	170.50
10/16/2019	MAL	Prepare for and have telephone conference with client regarding various ongoing matters and general strategy issues	340.00	1.50	510.00
10/16/2019	SEW	Phone conference with client to discuss status of case	175.00	0.90	157.50
12/19/2019	MAL	Review business development issues regarding Debtor subsidiary and discussions with J. Punelli regarding same	340.00	1.00	340.00
2/18/2020	MAL	Telephone calls with J. Punelli and counsel for potential DIP lender	350.00	0.80	280.00
3/11/2020	MAL	Various correspondence and discussions regarding call order assignments and ongoing training and payment assurances	350.00	1.50	525.00
4/2/2020	MAL	Various emails and discussions with debtor regarding ongoing tax and potential insurance issues and plan for resolving, review various documents and pleadings regarding same	350.00	2.00	700.00

4/10/2020	JJR	Conference call with Mark Lindsay, Jim Punelli and Ray Jones regarding status update, insurance issue and state court litigation.	365.00	0.70	255.50
		TOTAL SERVICES RENDERED		11.90	3,588.00

TIMEKEEPER SUMMARY

Mark A. Lindsay	4.00	HRS @ $	340.00/hr =	1,360.00
Mark A. Lindsay	4.30	HRS @ $	350.00/hr =	1,505.00
John J. Richardson	0.70	HRS @ $	365.00/hr =	255.50
Sarah E. Wenrich	0.90	HRS @ $	175.00/hr =	157.50
Christina N. Wirick	2.00	HRS @ $	155.00/hr =	310.00
Totals	11.90		$	3,588.00

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	3,588.00
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**3,588.00**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV012
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Plan & Disclosure Statement

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
12/12/2019	SEW	Research regarding exclusivity and begin drafting motion to extend exclusivity	175.00	1.20	210.00
12/16/2019	SEW	Complete draft of motion to extend exclusivity period	175.00	0.60	105.00
12/30/2019	JJR	Review/comment on draft motion to extend exclusivity period	310.00	0.60	186.00
12/30/2019	SEW	Review motion to extend exclusivity period, make final revisions, and send to John Richardson and Mark Lindsay for review	175.00	0.20	35.00
1/8/2020	MAL	Review and revise Motion to Extend Exclusivity and conference with Sarah Wenrich regarding same	340.00	2.00	680.00
1/9/2020	CNW	Draft proposed order and certificate of service, finalize and file Motion to Extend Exclusivity	155.00	0.50	77.50
1/9/2020	SEW	Discuss motion to extend exclusivity with Mark Lindsay, review Mark Lindsay's revisions, and complete final review of same	175.00	0.50	87.50
1/10/2020	CNW	Review motion to extend exclusivity, draft proposed order, file the motion and order with the court	155.00	0.50	77.50
1/30/2020	MAL	Various correspondence and discussions regarding potential plan provisions and funding sources	340.00	2.00	680.00
2/13/2020	MAL	Telephone call with J. Punelli and consider Plan issues and potential terms	350.00	3.00	1,050.00
2/14/2020	SEW	Begin drafting Plan of Reorganization	210.00	0.60	126.00

2/15/2020	SEW	Complete template of Plan with relevant definitions and provisions	210.00	1.30	273.00
2/19/2020	MAL	Conference with Salene Mazur Kraemer regarding case background, plan issues and strategy	350.00	1.00	350.00
2/19/2020	MAL	Various correspondence and review various documents regarding ongoing training services	350.00	1.00	350.00
2/19/2020	SMK	Confer with Mark Lindsay regarding case strategy	325.00	0.50	162.50
2/27/2020	MAL	Review and consider plan issues, review claims, contracts, etc. and consider potential plan provisions	350.00	2.50	875.00
3/9/2020	MAL	Conferences with Sarah Wenrich regarding exclusivity and reasons for extension	350.00	0.50	175.00
3/9/2020	MAL	Various telephone conferences with J. Punelli regarding Plan issues, potential terms and funding, review documents regarding same	350.00	2.00	700.00
3/10/2020	SEW	Draft and Proofread/revise second motion to extend exclusivity and send to Mark Lindsay and John Richardson for review	210.00	1.70	357.00
3/11/2020	SMK	Review forms for Plan and Disclosure Statement	325.00	0.30	97.50
3/12/2020	CNW	Review and finalize Second Motion to Extend Exclusivity, file the same with the Court	175.00	0.40	70.00
3/12/2020	MAL	Review and revise Motion to Extend Exclusivity, various conferences with Sarah Wenrich regarding same	350.00	1.50	525.00
3/12/2020	MAL	Telephone calls with J. Punelli and review of prior correspondence regarding ongoing Plan preparation and call order assignments	350.00	1.00	350.00
3/12/2020	MAL	Telephone call with counsel for Panthera Training regarding call order assignments, review of various correspondence and assignment documents for same	350.00	1.00	350.00
3/13/2020	MAL	Research regarding Plan and creditor treatment issues	350.00	2.50	875.00
3/20/2020	MAL	Email to J. Punelli regarding status, claims review and research regarding plan terms	350.00	2.00	700.00
3/25/2020	MAL	Various correspondence and discussions with client regarding potential plan issues	350.00	1.00	350.00
3/27/2020	MAL	Various emails and discussions regarding tax issues, potential plan terms and effects of Covid-19 situation.	350.00	2.00	700.00
3/30/2020	MAL	Continuing discussions with client regarding plan considerations and potential terms	350.00	1.00	350.00
3/31/2020	MAL	Telephone call with client group regarding ongoing Covid-19 situation and case effects	350.00	1.00	350.00
4/1/2020	MAL	Various correspondence and telephone discussions regarding plan funding and issues to be resolved	350.00	1.50	525.00
4/2/2020	MAL	Continuing review of potential plan issues and terms to be implemented	350.00	2.00	700.00
4/4/2020	JJR	Review/analyze objection to second motion to	365.00	0.40	146.00

		extend exclusivity period			
4/10/2020	JJR	Review/analyze WVEDA supplemental objection to motion to extend exclusivity period and hearing notice on motion to dismiss; confer with Mark Lindsay regarding same	365.00	0.40	146.00
4/13/2020	MAL	Research claim treatment and various potential plan issues	350.00	2.00	700.00
4/15/2020	MAL	Various emails and telephone calls regarding ongoing plan issues	350.00	2.00	700.00
4/22/2020	MAL	Various discussions and correspondence regarding ongoing plan issues, motion to extend exclusivity and trustee's motion to dismiss/convert	350.00	2.00	700.00
5/11/2020	CNW	Finalize and file third motion to extend exclusivity	175.00	0.30	52.50
5/11/2020	JJR	Review/comment on third motion to extend exclusivity period, confer with Mark Lindsay regarding same	365.00	0.90	328.50
5/11/2020	MAL	Draft and revise Motion to Extend Exclusivity	350.00	1.50	525.00
5/11/2020	SEW	Review Motion to Extend Exclusivity	210.00	0.20	42.00
5/14/2020	MAL	Various emails and discussions regarding recent contract issues and plan development	350.00	1.00	350.00
6/22/2020	MAL	Review objection and telephone call with counsel for WVEDA regarding objection to motion to extend exclusivity and potential alternative resolutions	350.00	1.00	350.00
6/24/2020	MAL	Prepare for and attend hearing on motion to extend exclusivity period by telephone, various follow-up communications regarding same	350.00	2.00	700.00
7/3/2020	MAL	Telephone call with J. Punelli regarding status of ongoing plan discussions and pending motion issues	350.00	0.60	210.00
		TOTAL SERVICES RENDERED		53.70	17,449.50

TIMEKEEPER SUMMARY

Salene Mazur Kraemer	0.80 HRS @ $	325.00/hr =	260.00
Mark A. Lindsay	4.00 HRS @ $	340.00/hr =	1,360.00
Mark A. Lindsay	38.60 HRS @ $	350.00/hr =	13,510.00
John J. Richardson	0.60 HRS @ $	310.00/hr =	186.00
John J. Richardson	1.70 HRS @ $	365.00/hr =	620.50
Sarah E. Wenrich	2.50 HRS @ $	175.00/hr =	437.50
Sarah E. Wenrich	3.80 HRS @ $	210.00/hr =	798.00
Christina N. Wirick	1.00 HRS @ $	155.00/hr =	155.00
Christina N. Wirick	0.70 HRS @ $	175.00/hr =	122.50
Totals	53.70		$ 17,449.50

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	17,449.50
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**17,449.50**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV013
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Insurance

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
4/3/2020	MAL	Various emails and discussions regarding tenant's insurance policy requirements and status of same	350.00	1.00	350.00
4/7/2020	MAL	Various emails and discussions with Debtor regarding property insurance and review various lease and other contract provisions	350.00	1.50	525.00
4/17/2020	MAL	Confirm insurance policy for property and telephone call to UST regarding same	350.00	0.50	175.00
4/21/2020	MAL	Review insurance details and telephone call with G. Kinder regarding insurance issue and various overall issues	350.00	0.50	175.00
4/30/2020	MAL	Emails with counsel for personal injury claimant and consideration of insurance and claim issues.	350.00	0.50	175.00
5/1/2020	MAL	Telephone call with G. Kinder and various correspondence and discussions regarding insurance	350.00	1.00	350.00
5/6/2020	MAL	Telephone call with counsel for Panthera Training employee personal injury claimant and potential relief from stay and insurance coverage, and review of available Panthera Training insurance information and lease requirements	350.00	1.50	525.00
5/19/2020	MAL	Communications with Panthera Training counsel regarding request for general liability insurance information as required by lease	350.00	0.40	140.00
6/18/2020	MAL	E-mails with counsel for WVEDA regarding insurance issues and review of entire new policy	350.00	1.00	350.00
		TOTAL SERVICES RENDERED		7.90	2,765.00

TIMEKEEPER SUMMARY

Mark A. Lindsay	7.90	HRS @ $ 350.00/hr =		2,765.00
Totals	7.90		$	2,765.00

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	2,765.00
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**2,765.00**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV014
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Taxes

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
10/22/2019	SEW	Speak with Tammy from Hardy County on the phone	175.00	0.20	35.00
10/30/2019	MAL	Conference with Sarah Wenrich regarding Hardy County tax delinquency	340.00	0.50	170.00
10/30/2019	SEW	Call Tammy at the Hardy County Sheriff's office regarding the tax lien sale to confirm cancellation and discuss same with Mark Lindsay	175.00	0.70	122.50
11/20/2019	SEW	Phone call with Tammy from Hardy County Sheriff's Office regarding tax matter	175.00	0.10	17.50
		TOTAL SERVICES RENDERED		1.50	345.00

TIMEKEEPER SUMMARY

Mark A. Lindsay	0.50	HRS @ $ 340.00/hr =		170.00
Sarah E. Wenrich	1.00	HRS @ $ 175.00/hr =		175.00
Totals	1.50		$	345.00

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	345.00
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**345.00**

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1.5% finance charge per month for invoices over 30 days old
Tax I.D. Number 25-1441443

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV016
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Claims

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
9/19/2019	RSB	Trade e-mail messages with Travis Knobbe regarding status of WVEDA claim, telephone call with Travis	550.00	0.30	165.00
9/20/2019	RSB	Receive, review and respond to email from client regarding Agility litigation	550.00	0.10	55.00
9/23/2019	RSB	Trade e-mail messages with Debra Allen regarding statements and title search	550.00	0.20	110.00
4/21/2020	JJR	Telephone call and emails with Spencer Elliott regarding administrative claim related to personal injury claim.	365.00	0.60	219.00
		TOTAL SERVICES RENDERED		1.20	549.00

TIMEKEEPER SUMMARY

Robert S. Bernstein	0.60	HRS @ $ 550.00/hr =		330.00
John J. Richardson	0.60	HRS @ $ 365.00/hr =		219.00
Totals	1.20		$	549.00

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	549.00
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**549.00**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV017
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Miscellaneous Motions

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
10/22/2019	JJR	Review Panthera Training's motion to compel performance under subcontract, meeting and discuss same with Mark Lindsay	310.00	0.50	155.00
10/22/2019	MAL	Review and analyze Motion to Compel Compliance with Subcontract filed by Panthera Training	340.00	2.00	680.00
10/23/2019	MAL	Review documents and pleadings and draft response to Motion to Compel	340.00	4.00	1,360.00
10/23/2019	SEW	Research regarding local rules and federal rules for notice period of motions and response deadlines for a general motion and email Mark Lindsay regarding the rules	175.00	0.70	122.50
10/24/2019	MAL	Continue review, revise and draft Response to Motion to Compel	340.00	3.00	1,020.00
10/24/2019	SEW	Review Mark Lindsay's response to Panthera Training's motion to compel	175.00	0.30	52.50
10/25/2019	CNW	Finalize Response to Motion to Compel and submit to Court and counsel as per instructions by the Court	155.00	0.40	62.00
10/25/2019	MAL	Revise and finalize Response to Motion to Compel, various correspondence and discussions with client regarding same, and coordinate submission of same	340.00	3.00	1,020.00
10/25/2019	SEW	Final proofreading and review of the response to Pathera Training's Motion to Compel	175.00	0.30	52.50
10/28/2019	MAL	Prepare for and attend telephonic hearing on Motion to Compel	340.00	3.00	1,020.00

11/4/2019	JJR	Review/analyze motion to convert or dismiss case and voluminous exhibits, discuss same with Mark Lindsay	310.00	1.50	465.00
11/4/2019	JJR	Review/analyze WVEDA's motion for relief from stay, discuss same with Mark Lindsay	310.00	0.50	155.00
11/4/2019	MAL	Review EDA Motion to Dismiss/Convert and Motion for Relief from Stay and consider responses	340.00	2.50	850.00
11/4/2019	SEW	Begin reviewing WDEVA's motion to convert or dismiss the case	175.00	0.30	52.50
11/5/2019	JJR	Meetings with Mark Lindsay regarding responding to Training's letter regarding task orders and documents and WVEDA's motions to convert/dismiss and for relief from stay	310.00	0.50	155.00
11/5/2019	JJR	Review/analyze Jim Punelli's comments to Training's motion to convert/dismiss, discuss same with Mark Lindsay	310.00	0.60	186.00
11/5/2019	MAL	Further review of EDA Motions, conference with John Richardson regarding same and various outstanding matters and telephone call with J. Punelli regarding status and strategy	340.00	3.50	1,190.00
11/5/2019	RSB	Receive and review messages regarding conversion motion, respond to Mark Lindsay	550.00	0.20	110.00
11/5/2019	SEW	Complete review of the motion to dismiss or convert the case filed by the WVEDA	175.00	0.60	105.00
11/5/2019	SEW	Review James Punelli's response to the WVEDA claims	175.00	0.40	70.00
11/7/2019	MAL	Review, revise and finalize Motion for temporary restraining order and preliminary injunction, various correspondence and discussions regarding same	340.00	3.00	1,020.00
11/12/2019	JJR	Prepare for telephonic hearing on WVEDA's motion to convert and motion for relief from stay, review/analyze motions, outline comments, discussion with Mark Lindsay regarding same	310.00	1.20	372.00
11/12/2019	JJR	Telephonic hearing regarding WVEDA's motion to convert and motion for relief from stay, meeting with Mark Lindsay regarding same, then telephone call with Jim Punelli regarding same	310.00	1.10	341.00
11/12/2019	MAL	Review various pleadings and documents, conference with John Richardson, prepare for and attend telephone preliminary hearing on WVEDA Motions	340.00	2.50	850.00
11/22/2019	MAL	Prepare and transmit requests for production of documents to WVEDA	340.00	1.50	510.00
11/25/2019	CNW	Receive then review Order setting hearing date and response deadline related to EDA's motions to convert and for relief, send update to Sarah Wenrich	155.00	0.20	31.00
11/26/2019	SEW	Begin researching statutory issue regarding argument of WV EDA	175.00	1.70	297.50
11/27/2019	SEW	Begin reviewing WVEDA's motion to convert /	175.00	2.80	490.00

		dismiss the case as well as other relevant documents and prepare strategy and ideas in preparation to draft response			
12/1/2019	SEW	Review and analyze motion for relief from stay in preparation for response	175.00	0.80	140.00
12/3/2019	MAL	Further review and analysis of EDA Motions for Relief from Stay and to Convert/Dismiss Case, various conferences regarding same	340.00	2.00	680.00
12/3/2019	MAL	Various conferences with J. Punelli, John Richardson and Sarah Wenrich regarding potential agreement with Panthera Training and various other pending issues	340.00	2.00	680.00
12/3/2019	MAL	Telephone call with EDA counsel regarding potential discovery requests	340.00	0.30	102.00
12/3/2019	MAL	Review EDA mortgage documents and related SNDA	340.00	0.50	170.00
12/3/2019	SEW	Discuss WVEDA's motions for relief and to convert/dismiss case with Mark Lindsay and contact chambers regarding responses to same	175.00	0.40	70.00
12/3/2019	SEW	Begin drafting objection to WVEDA's motion to convert / dismiss case	175.00	1.00	175.00
12/3/2019	SEW	Begin drafting objection to WVEDA's motion for relief from stay	175.00	0.60	105.00
12/4/2019	MAL	Draft Motion to Extend time to answer EDA Motions for Relief from Stay and to Convert/Dismiss	340.00	0.50	170.00
12/4/2019	MAL	Analyze and prepare partial draft responses to EDA Motion to Convert/Dismiss and Motion for Relief from Stay	340.00	3.50	1,190.00
12/4/2019	MAL	Follow up review of EDA informal discovery requests and correspondence with J. Punelli regarding same	340.00	1.00	340.00
12/4/2019	SEW	Drafting of and research regarding objection to WVEDA's Motion for Relief	175.00	3.70	647.50
12/4/2019	SEW	Drafting objection to WVEDA's Motion to Convert / Dismiss	175.00	3.00	525.00
12/5/2019	CNW	Review and finalize and file Motion to Extend Time to Respond to EDA's Motions	155.00	0.30	46.50
12/5/2019	MAL	Continuing review and revise draft responses to EDA Motions for Relief from Stay and to convert/dismiss case	340.00	2.50	850.00
12/5/2019	SEW	Proofread/revise objection to motion for relief and email to Mark Lindsay for review	175.00	0.40	70.00
12/5/2019	SEW	Complete draft of Objection to Motion to Convert	175.00	2.50	437.50
12/5/2019	SEW	Proofread/revise objection to WVEDA's motion to convert	175.00	1.10	192.50
12/7/2019	JJR	Review/analyze letter from WVEDA's counsel regarding document request, confer with Mark Lindsay regarding same	310.00	0.30	93.00
12/9/2019	JJR	Review/comment/revise response to WVEDA's	310.00	0.80	248.00

		motion to dismiss/convert, confer with Mark Lindsay regarding same			
12/10/2019	MAL	Draft and revise objections to EDA Motions for Relief from Stay and to Convert/Dismiss, various meetings and correspondence regarding same	340.00	7.00	2,380.00
12/10/2019	MAL	Finalize and transmit informal discovery responses to EDA counsel	340.00	0.50	170.00
12/10/2019	SEW	Discuss responses to WVEDA motions with Mark Lindsay	175.00	0.10	17.50
12/11/2019	JJR	Review/comment/revise responses to WVEDA's motion to convert/dismiss and for relief from stay, confer with Mark Lindsay and Sarah Wenrich regarding same	310.00	1.00	310.00
12/11/2019	MAL	Revise and finalize Objections to EDA Motions for Relief from Stay and to Convert/Dismiss case	340.00	8.00	2,720.00
12/11/2019	SEW	Review response to EDA's Motion to Convert/Dismiss and revise the response to the EDA's Motion for Relief to incorporate the same revisions	175.00	1.50	262.50
12/11/2019	SEW	Proofread response to EDA's Motion to Convert to prepare for filing	175.00	1.00	175.00
12/12/2019	MAL	Review pleadings, consider issues and prepare for hearing on EDA Motion to convert/dismiss	340.00	3.50	1,190.00
12/12/2019	SEW	Review various email correspondences and documents received from client and compile the same for Mark Lindsay to prepare for the hearing on WVEDA's Motion to Convert/Dismiss	175.00	1.30	227.50
12/13/2019	MAL	Review all pleadings, exhibits, etc. and prepare for EDA hearing	340.00	3.50	1,190.00
12/13/2019	MAL	Review and comment on proposed stipulated facts and exhibits	340.00	1.00	340.00
12/15/2019	JJR	Prepare for hearing on WVEDA motion to dismiss/convert, meeting with Mark Lindsay regarding same, review Jim Punelli's testimony from Rule 341 meeting, telephone calls with Jim Punelli and Mark Lindsay regarding same, review/comment on proposed stipulation of facts	310.00	6.50	2,015.00
12/15/2019	MAL	Meetings with John Richardson regarding hearing on EDA Motion to Convert or Dismiss and prepare for same	340.00	6.00	2,040.00
12/16/2019	JJR	Travel to/from Wheeling, WV in connection with WVEDA's motion to convert/dismiss	310.00	2.50	775.00
12/16/2019	JJR	Evidentiary hearing on WVEDA's motion to convert/dismiss, pre and post-hearing meetings with Mark Lindsay, Jim Punelli and Ray Jones	310.00	9.30	2,883.00
12/16/2019	MAL	Travel to and from Bankruptcy Court, meetings with client, and attend evidentiary hearings on EDA Motion to Convert or Dismiss	340.00	12.00	4,080.00
12/17/2019	MAL	Follow up correspondence with EDA counsel regarding discovery requests and review prior	340.00	0.50	170.00
12/27/2019	SEW	Review court order denying WVEDA's motion to	175.00	0.30	52.50

		convert/dismiss case and send e-mail message to John Richardson and Mark Lindsay regarding same			
12/30/2019	MAL	Various correspondence regarding status of pending EDA Motion for Relief from Stay	340.00	0.30	102.00
12/30/2019	MAL	Review research and legal authority regarding relief from stay in light of recent Court ruling on EDA Motion	340.00	1.00	340.00
12/31/2019	JJR	Emails with Mark Lindsay and Jim Punelli regarding task orders and assignment issues, confer with Mark Lindsay regarding same	310.00	0.60	186.00
12/31/2019	JJR	Review/analyze court's opinion and order denying WVEDAs motion to convert/dismiss, confer with Mark Lindsay and Jim Punelli regarding same	310.00	0.50	155.00
1/2/2020	MAL	Telephone call with counsel for WVEDA regarding ongoing issues and discovery and various correspondence regarding Training issues	340.00	2.00	680.00
4/7/2020	JJR	Review/analyze motion to convert case to Chapter 7	365.00	0.40	146.00
4/8/2020	MAL	Review Trustee's Motion to Dismiss and various correspondence and discussions regarding same	350.00	2.00	700.00
4/15/2020	MAL	Discussions regarding trustee's motion to dismiss/convert and status of insurance	350.00	0.70	245.00
4/16/2020	MAL	Various discussions regarding ongoing plan issues and pending UST motion to dismiss/convert and status of insurance	350.00	1.50	525.00
4/23/2020	MAL	Draft response to trustee's motion to dismiss/convert and review insurance information	350.00	1.00	350.00
4/24/2020	CNW	Finalize and file response to US Trustee's Motion to Dismiss	175.00	0.30	52.50
4/24/2020	MAL	Finalize and coordinate filing of response to trustee's motion to dismiss and email to trustee's office regarding same	350.00	0.80	280.00
4/29/2020	MAL	Review pleadings, documents and legal authority and prepare for hearings on Motion to Dismiss/Convert and Motion to Extend Exclusivity	350.00	3.00	1,050.00
4/29/2020	MAL	Telephone call with G. Kinder regarding status of UST's Motion to Dismiss/Convert and request for continuance	350.00	0.30	105.00
4/29/2020	MAL	Attend telephonic hearings on Motion to Dismiss/Convert and Motion to Extend Exclusivity	350.00	0.80	280.00
4/30/2020	MAL	Discussions with debtor regarding issues raised at 4/29 hearings on motion to dismiss and motion to extend exclusivity.	350.00	0.50	175.00
5/4/2020	MAL	Various discussions and correspondence regarding motion to dismiss and resolution of issues	350.00	1.00	350.00
5/5/2020	CNW	Receive then review order setting deadlines for Training's Amended Motion, update file regarding the same	175.00	0.20	35.00
5/5/2020	JJR	Review/analyze scheduling order regarding motion	365.00	0.20	73.00

		to convert, confer with Mark Lindsay regarding same			
5/7/2020	SEW	Review Joint Motion to convert case	210.00	0.30	63.00
5/14/2020	MAL	Research regarding motion to dismiss or convert issues and review of prior documents and pleadings	350.00	2.50	875.00
5/14/2020	SMK	Email to and from Mark Lindsay regarding motion to dismiss	325.00	0.20	65.00
5/15/2020	MAL	Review joint motion to dismiss and Telephone call with J. Punelli regarding same	350.00	2.00	700.00
5/15/2020	SMK	Review various motions to dismiss filed in the case and related documentation; email to Mark Lindsay regarding insurance	325.00	0.80	260.00
5/19/2020	MAL	Communications with Salene Mazur Kraemer regarding discovery requests related to motion to dismiss/convert	350.00	0.50	175.00
5/19/2020	SMK	Email to and from Mark Lindsay regarding motion to dismiss	325.00	0.10	32.50
5/20/2020	MAL	Review Motion to Dismiss and consider various response issues and draft language, Telephone call with Salene Mazur Kraemer regarding same	350.00	1.50	525.00
5/20/2020	SEW	Phone call with Mark Lindsay regarding response to motion to convert	210.00	0.10	21.00
5/20/2020	SMK	Call with Mark Lindsay regarding answer to motion to dismiss	325.00	0.50	162.50
5/21/2020	MAL	Review operating reports, correspondence, insurance information, etc., and draft various portions of response to Motion to Dismiss	350.00	3.00	1,050.00
5/21/2020	SMK	Email to Mark Lindsay regarding response to motion to dismiss, draft response to motion to dismiss	325.00	0.50	162.50
5/22/2020	MAL	Review and finalize debtor's response to joint motion to dismiss or convert case, various correspondence and telephone calls with Salene Mazur Kraemer and Sarah Wenrich regarding same	350.00	3.00	1,050.00
5/22/2020	MAL	Research regarding motion to dismiss issues and cited case law	350.00	1.00	350.00
5/22/2020	SEW	Complete research to support reply in opposition to motion to dismiss case	210.00	1.00	210.00
5/22/2020	SEW	Review Motion to Convert / Dismiss and email from Mark Lindsay regarding reply to the same, review Salene Mazur Kraemer's draft of the reply, phone call with Mark Lindsay regarding reply and filing	210.00	1.20	252.00
5/22/2020	SEW	Phone call with Mark Lindsay regarding revisions to reply, review same and Send e-mail message to Mark Lindsay regarding same	210.00	0.50	105.00
5/22/2020	SEW	Phone call with Mark Lindsay regarding final version of objection to the motion to convert; finalize documents and exhibit for filing and file	210.00	0.30	63.00

		same			
5/22/2020	SMK	Continued revisions to objection to motion to dismiss	325.00	0.80	260.00
5/22/2020	SMK	Further revise pleading in the case, email to Mark Lindsay and Sarah Wendrich regarding legal research and factual issues, final revisions to motion regarding same	325.00	3.90	1,267.50
5/22/2020	SMK	Further revisions to motion to dismiss	325.00	0.40	130.00
5/27/2020	MAL	Review and initial consideration of responses to discovery requests, Telephone call with Salene Mazur Kraemer and email with John Richardson regarding same	350.00	1.50	525.00
5/27/2020	SMK	Call with Mark Lindsay regarding revisions to discovery requests	325.00	0.30	97.50
5/27/2020	TRH	Discuss discovery responses with Salene Mazur Kraemer	215.00	0.20	43.00
5/28/2020	MAL	Review and revise discovery requests upon EDA and Panthera Training, discussions with Salene Mazur Kraemer regarding same	350.00	2.00	700.00
5/28/2020	MAL	Communications with UST regarding motion to dismiss/convert issues	350.00	0.30	105.00
5/28/2020	SEW	Review motion for relief from stay and trade e-mail messages with Christina Wirick regarding same	210.00	0.30	63.00
5/28/2020	SMK	Call with Mark Lindsay regarding discovery and email and call with Trisha Hudkins regarding same	325.00	0.80	260.00
5/28/2020	SMK	Draft discovery regarding motion to dismiss	325.00	1.00	325.00
5/28/2020	SMK	Completion of Draft discovery regarding motion to dismiss	325.00	1.00	325.00
5/28/2020	SMK	Draft discovery for Panthera Training and email to parties regarding same	325.00	0.90	292.50
5/29/2020	MAL	Review Motion to Dismiss and various documentation, and telephone call with G. Kinder regarding various issues and potential resolution of same	350.00	1.50	525.00
5/30/2020	JJR	Review/analyze WVEDA's motion to convert and Panthera response thereto, review/analyze WVEDA's discovery requests related thereto, confer with Mark Lindsay regarding potential objections and responses, draft potential objections	365.00	3.50	1,277.50
6/1/2020	JJR	Review/analyze Gust motion for relief from stay	365.00	1.00	365.00
6/1/2020	MAL	Additional and continuing research regarding case conversion and dismissal issues	350.00	3.00	1,050.00
6/1/2020	SEW	Review Trustee's response to Motion to Convert/ Dismiss	210.00	0.10	21.00
6/1/2020	SMK	Call to and from Trisha Hudkins and Mark Lindsay regarding answers to discovery requests	325.00	0.10	32.50
6/1/2020	TRH	Review discovery requests in preparation for drafting response to the same, communicate with Salene Mazur Kraemer regarding client contact	215.00	0.50	107.50

6/2/2020	SMK	E-mail to Trisha Hudkins regarding discovery	325.00	0.10	32.50
6/2/2020	TRH	E-mail to client regarding discovery requests and conference call regarding the same	215.00	0.20	43.00
6/2/2020	TRH	Exchange e-mails with Salene Mazur Kraemer and client regarding discovery responses	215.00	0.20	43.00
6/3/2020	JJR	Review discovery requests related to conversion motion and suggest objections and responses, confer with Mark Lindsay regarding same	365.00	0.50	182.50
6/3/2020	MAL	Review and draft comments for discovery responses to EDA and Training	350.00	2.00	700.00
6/3/2020	SMK	E-mails to and from Trisha Hudkins and Mark Lindsay regarding discovery	325.00	0.30	97.50
6/3/2020	TRH	Conference call with Jim Punelli discussing discovery responses	215.00	0.40	86.00
6/3/2020	TRH	E-mail communications with John Richardson, Mark Lindsay, and Salene Mazur Kraemer discussing discovery responses	215.00	0.20	43.00
6/3/2020	TRH	Receipt and review of documents for production from client and explanations for interrogatory responses	215.00	0.30	64.50
6/3/2020	TRH	Preparing responses to Movants' Discovery Requests	215.00	2.60	559.00
6/4/2020	SMK	E-mail to Mark Lindsay and Trisha Hudkins regarding discovery responses	325.00	0.30	97.50
6/4/2020	TRH	E-mail communications discussing proposed revisions to discovery responses	215.00	0.30	64.50
6/5/2020	JJR	Confer with Trisha Hudkins and Mark Lindsay regarding final revisions to discovery requests	365.00	0.70	255.50
6/5/2020	MAL	Review draft and revise discovery responses and telephone call with John Richardson and Trisha Hudkins regarding same	350.00	2.00	700.00
6/5/2020	SEW	Review motion for protective order filed by Panthera Training, LLC	210.00	0.20	42.00
6/5/2020	SMK	Review discovery and recent pleadings	325.00	0.30	97.50
6/5/2020	TRH	Confer with John Richardson and Mark Lindsay regarding final revisions to discovery requests; confer with client regarding follow-up questions; make revisions to discovery responses	215.00	0.90	193.50
6/6/2020	JJR	Review/analyze Debtor's objection to Motion to Dismiss or convert	365.00	0.50	182.50
6/7/2020	MAL	Various e-mails with client and UST regarding discovery responses and documents and review of same	350.00	2.00	700.00
6/8/2020	MAL	Review all pleading, relevant document and discovery responses regarding motion to convert or dismiss	350.00	2.00	700.00
6/8/2020	SMK	Review e-mails regarding discovery and coverage of hearing	325.00	0.30	97.50
6/9/2020	MAL	Review pleadings, research, etc. and prepare for hearings on Motion to Dismiss/Convert and other	350.00	2.00	700.00

		matters			
6/9/2020	MAL	Correspondence and telephone call with debtor regarding hearing and continuing preparation for same	350.00	2.00	700.00
6/10/2020	CNW	Draft stipulation regarding extension of time to respond to Gust Motion for Relief, send to Sarah Wenrich for review	175.00	0.50	87.50
6/10/2020	CNW	Receive then review approval of opposing to counsel to file, send to John Richardson for final review, finalize and file the same with the Court	175.00	0.40	70.00
6/10/2020	JJR	Review stipulation regarding motion for relief from stay; approve same for filing	365.00	0.20	73.00
6/10/2020	JJR	Attend telephonic hearing on motion to dismiss or convert case; confer with Mark Lindsay regarding same	365.00	1.50	547.50
6/10/2020	MAL	Prepare for and attend telephonic hearing on Motion to Dismiss or Convert and other matters	350.00	2.50	875.00
6/10/2020	SEW	Proofread/revise stipulation to extend debtor's deadline to reply to Motion for Relief and send e-mail message to Spencer Elliot regarding same	210.00	0.20	42.00
6/10/2020	SMK	Call with Mark Lindsay in preparation for hearing on motion to dismiss and attend telephonic hearing regarding same	325.00	0.80	260.00
6/15/2020	JJR	Review e-mails and notice regarding intent to offer bank account statements into evidence; confer with Mark Lindsay regarding same	365.00	0.30	109.50
6/15/2020	MAL	Review and consideration of issues for motion to dismiss/convert hearing and scheduling	350.00	1.00	350.00
6/16/2020	MAL	Address personal injury motion for relief from stay, review insurance information and consider issues for stipulated order	350.00	1.00	350.00
6/17/2020	MAL	Review Gust motion for relief from stay and proposed order, telephone call and e-mails with Gust's counsel regarding potential resolution	350.00	1.50	525.00
6/22/2020	MAL	Review background, allegations and insurance issues, and address proposed resolution of Gust motion for relief from stay regarding personal injury action	350.00	1.50	525.00
6/23/2020	MAL	Review trial scheduling order and communications regarding same	350.00	0.50	175.00
6/23/2020	SEW	Review order regarding hearing requirements for the motions to dismiss	210.00	0.20	42.00
6/30/2020	CNW	Trade e-mail messages with Judges chambers regarding continuation of mediation	175.00	0.20	35.00
6/30/2020	CNW	Discussion with internal team regarding upcoming deadlines related to the evidentiary hearing, witnesses, etc	175.00	0.50	87.50
6/30/2020	CNW	Draft Subpoena to Appear and Testify and send to Mark Lindsay	175.00	0.40	70.00
6/30/2020	MAL	Conference with Christina Wirick regarding scheduling order and preparation of witness and	350.00	1.50	525.00

		exhibit list; review various documents regarding same			
7/1/2020	MAL	Various e-mails and telephone calls regarding scheduled hearing on motion to dismiss and items to prepare for same	350.00	2.00	700.00
7/5/2020	MAL	Review and consider changes to draft joint list of witnesses and exhibits; e-mails regarding same	350.00	1.50	525.00
7/6/2020	MAL	Review exhibits, correspondence, etc. and prepare debtor's portion of joint witness and exhibit list	350.00	2.00	700.00
7/8/2020	JJR	Confer with Mark Lindsay regarding motion to convert strategy	365.00	0.30	109.50
7/8/2020	MAL	Review and revise draft protective order and e-mails with counsel for Training and debtor regarding same	350.00	1.00	350.00
7/9/2020	MAL	Review final protective order and resulting production from Training	350.00	1.50	525.00
7/10/2020	CNW	Review Exhibit List, organize exhibits, scan and mark exhibits, bookmark exhibits in PDF form, as per instructions of the Court and send to Mark Lindsay for review	175.00	1.70	297.50
7/10/2020	JJR	Telephone call with Mark Lindsay, Jim Punelli and Ray Jones regarding hearing on conversion motion	365.00	0.50	182.50
7/10/2020	MAL	Prepare for and attend telephone call with John Richardson, J Punelli and R. Jones regarding case status and upcoming hearing on motion to dismiss/convert	350.00	1.00	350.00
7/10/2020	MAL	Review and prepare exhibits for submission to court in advance of hearing and review file copies of proposed Movants' exhibits	350.00	2.00	700.00
7/13/2020	CNW	Trade e-mails with clients regarding information for evidentiary hearing; draft notice of intent to appear remotely and send to Mark Lindsay for revisions	175.00	0.70	122.50
7/13/2020	CNW	Finalize draft notice of remote appearance for hearing, send to Mark Lindsay for review and approval	175.00	0.30	52.50
7/13/2020	CNW	File the Notice of Witnesses with the Court	175.00	0.20	35.00
7/13/2020	MAL	Review all exhibits and conference with J. Punelli regarding same and task items to prepare for hearing	350.00	2.00	700.00
7/14/2020	MAL	Review and revise proposed stipulated facts and emails and telephone call with J. Punelli regarding same	350.00	1.50	525.00
7/15/2020	MAL	Telephone call with G. Kinder regarding potential resolution to motion to convert and review documents and draft outlines for hearing preparation and presentation	350.00	4.00	1,400.00
7/15/2020	SMK	Calls to and from Mark Lindsay regarding scheduling of Sheriff's sale	325.00	0.30	97.50
7/16/2020	CNW	Prepare exhibit binders in advance of evidentiary hearing for Mark Lindsay	175.00	2.00	350.00
7/16/2020	MAL	Continue preparing for hearing on Motion to	350.00	6.00	2,100.00

		Convert, various conferences and correspondence with debtor and counsel for other parties			
7/16/2020	SMK	E-mail to and from Mark Lindsay regarding Midtown Resources and joinder to objection to Motion to Dismiss; e-mail to A. Robleto regarding same	325.00	0.30	97.50
7/17/2020	MAL	Draft and revise proposed conversion order and various correspondence and telephone calls regarding same and next steps	350.00	2.50	875.00
7/20/2020	MAL	Review conversion rules and provisions and discussions with debtor regarding same	350.00	1.00	350.00
7/21/2020	MAL	Telephone call with John Richardson regarding conversion details and next steps	350.00	0.40	140.00
7/23/2020	MAL	Review conversion order and e-mails with appointed trustee regarding same	350.00	0.50	175.00
		TOTAL SERVICES RENDERED		263.90	83,037.50

TIMEKEEPER SUMMARY

Robert S. Bernstein	0.20	HRS @ $ 550.00/hr =		110.00
Trisha R. Hudkins	5.80	HRS @ $ 215.00/hr =		1,247.00
Salene Mazur Kraemer	14.00	HRS @ $ 325.00/hr =		4,550.00
Mark A. Lindsay	85.60	HRS @ $ 340.00/hr =		29,104.00
Mark A. Lindsay	83.80	HRS @ $ 350.00/hr =		29,330.00
John J. Richardson	27.40	HRS @ $ 310.00/hr =		8,494.00
John J. Richardson	9.60	HRS @ $ 365.00/hr =		3,504.00
Sarah E. Wenrich	24.80	HRS @ $ 175.00/hr =		4,340.00
Sarah E. Wenrich	4.40	HRS @ $ 210.00/hr =		924.00
Christina N. Wirick	0.90	HRS @ $ 155.00/hr =		139.50
Christina N. Wirick	7.40	HRS @ $ 175.00/hr =		1,295.00
Totals	263.90		$	83,037.50

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	83,037.50
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**83,037.50**

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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV018
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Adversary Proceedings

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
10/3/2019	SEW	Begin drafting adversary proceeding complaint	175.00	2.80	490.00
10/4/2019	SEW	Research for and drafting of adversary proceeding against Panthera Training	175.00	3.50	612.50
10/5/2019	SEW	Review letter from Panthera Training's counsel and Jim Punelli's response to said letter	175.00	0.40	70.00
10/7/2019	MAL	Review draft complaint regarding lease defaults and termination and conference with John Richardson regarding same	340.00	1.50	510.00
10/7/2019	MAL	Continuing review and analysis of lease default issues and response and assertions from tenant	340.00	1.00	340.00
10/7/2019	SEW	Proofread/revise adversary complaint and accompanying proposed order against Panthera Training	175.00	1.70	297.50
10/8/2019	JJR	Meeting with Mark Lindsay regarding turnover complaint	310.00	0.40	124.00
10/8/2019	MAL	Review all agreements and correspondence and meet with John Richardson to discuss litigation strategy	340.00	2.00	680.00
10/9/2019	MAL	Review and consider responses to Debtor's notices of default under operative contracts and leases	340.00	1.50	510.00
10/11/2019	JJR	Review draft complaint, agreements, correspondence and other background materials, formulate litigation strategy, meeting with Mark Lindsay regarding same	310.00	2.40	744.00
10/14/2019	MAL	Review and revise draft Complaint against PT regarding lease termination and various	340.00	2.00	680.00

		conferences and correspondence regarding same			
10/14/2019	SEW	Review John Richardson's suggested revisions to the complaint, complete final proofread/revisions to the complaint, then send to the client for review	175.00	1.50	262.50
10/15/2019	JJR	Review/comment on revised complaint, research regarding injunction procedure, meeting with Mark Lindsay regarding strategy	310.00	0.60	186.00
10/15/2019	MAL	Review and revise draft complaint and conference with John Richardson regarding same	340.00	3.00	1,020.00
10/16/2019	JJR	Strategy meeting with Mark Lindsay regarding temporary restraining order and preliminary injunction, telephone call with Jim Punelli regarding same	310.00	1.00	310.00
10/16/2019	MAL	Review and revise complaint and conference with John Richardson regarding same	340.00	1.50	510.00
10/16/2019	RSB	Revise Adversary Complaint	550.00	0.30	165.00
10/17/2019	CNW	Review Panthera Training complaint, make revisions, discuss with Mark Lindsay and Sarah Wenrich, file the same with the Court	155.00	0.90	139.50
10/21/2019	MAL	Review complaint for turnover of property and consider issues for motion for temporary restraining order, review legal authority regarding same	340.00	2.00	680.00
10/21/2019	SEW	Review necessary documents and begin drafting motion for temporary restraining order / preliminary injunction	175.00	5.00	875.00
10/22/2019	MAL	Conference with Sarah Wenrich regarding Motion for TRO, review standards for same and underlying complaint and documents.	340.00	2.00	680.00
10/22/2019	SEW	Continue motion for temporary restraining order & preliminary injunction and affidavit	175.00	0.50	87.50
10/23/2019	CNW	Review Summons for Panthera Training, draft proof of service, serve complaint and summons, file proof of service with the Court	155.00	0.40	62.00
10/23/2019	SEW	Complete draft of motion for temporary restraining order / preliminary injunction, draft proposed order, and draft accompanying affidavit	175.00	3.30	577.50
10/24/2019	JJR	Review and comment on draft response to motion to compel performance and motion for temporary restraining order and preliminary injunction	310.00	1.00	310.00
10/24/2019	MAL	Review and revise draft Motion for temporary restraining order and temporary injunction and related documents	340.00	1.50	510.00
10/25/2019	MAL	Further review and revision to draft Motion for TRO and preliminary injunction	340.00	1.00	340.00
10/28/2019	JJR	Conference call with Court and opposing counsel regarding motions for preliminary relief, briefing schedule and hearing, strategy meeting with Mark Lindsay regarding same, telephone call with Mark Lindsay and Jim Punelli regarding same	310.00	2.50	775.00
10/28/2019	MAL	Conferences with John Richardson and client	340.00	1.50	510.00

		regarding scheduling and planning for evidentiary hearings			
10/30/2019	JJR	Review defendant's request for documents and discuss same with Mark Lindsay	310.00	0.30	93.00
10/30/2019	MAL	Initial review of document requests form Panthera Training and correspondence with debtor regarding same	340.00	0.50	170.00
10/31/2019	JJR	Review letter from defendant's counsel demanding extension of task orders, discuss same with Mark Lindsay and Jim Punelli, draft responsive letter to Doug Kahle, review subcontract in connection with same	310.00	2.50	775.00
11/4/2019	JJR	Meeting with Mark Lindsay regarding demand for task orders, motion to convert, document request and preparation for preliminary injunction hearing	310.00	0.40	124.00
11/4/2019	JJR	Review/analyze documents provided by Jim Punelli in response to Training's informal request for documents	310.00	0.70	217.00
11/4/2019	JJR	Review/analyze enumerated list of items that must be turned over upon transition of possession of leased premises, discuss same with Mark Lindsay and Sarah Wenrich	310.00	0.40	124.00
11/5/2019	JJR	Telephone calls with Mark Lindsay and Jim Punelli regarding responses to Training's letters and motions	310.00	1.00	310.00
11/5/2019	JJR	Review DOJ letter regarding novation of government contracts	310.00	0.20	62.00
11/5/2019	JJR	Draft letter to Doug Kahle responding to his November 4 letter regarding Army task order and refusal to produce documents	310.00	0.80	248.00
11/6/2019	AS	Draft/proofread/revise letter to Douglas Kahle regarding communications between Panthera Training and 1st SIG	145.00	0.10	14.50
11/6/2019	JJR	Edit/revise letter to Doug Kahle regarding task orders and document requests	310.00	1.00	310.00
11/6/2019	MAL	Conference with John Richardson regarding status and strategy, review various correspondence with Panthera Training's counsel	340.00	1.50	510.00
11/7/2019	CNW	Review and finalize TRO Motion, file with the Court, update internal team	155.00	0.40	62.00
11/7/2019	JJR	Review, revise and comment on draft task order, emails with Jim Punelli and Mark Lindsay regarding same, emails with Doug Kahle regarding same	310.00	0.80	248.00
11/7/2019	JJR	Review/comment on revised draft of motion for temporary restraining order and preliminary injunction, discuss same with Mark Lindsay	310.00	0.80	248.00
11/8/2019	CNW	Review docket and Panthera Training's Answer and Counterclaim, send to internal team, review scheduling order related to TRO hearing, update file	155.00	0.40	62.00
11/8/2019	CNW	Review docket to determine counsel for Panthera	155.00	0.20	31.00

		Training, send email to counsel and US Trustee serving the TRO Motion			
11/8/2019	MAL	Review answer and counterclaim filed by Panthera Training, and review various related documentation, allegations, etc	340.00	1.00	340.00
11/8/2019	MAL	Review and consider legal authority for preliminary injunction relief and review various related contractual provisions	340.00	2.00	680.00
11/10/2019	JJR	Review/analyze/comment on Training's answer and counterclaim	310.00	1.10	341.00
11/10/2019	JJR	Review/analyze Training's request for production of documents	310.00	0.30	93.00
11/10/2019	SEW	Review Panthera Training's answer to complaint	175.00	0.60	105.00
11/11/2019	CNW	Email to client with copy of Panthera Training's Answer and Counterclaim	155.00	0.10	15.50
11/11/2019	JJR	Draft/edit/revise request for production of documents directed to Training, confer with Mark Lindsay regarding same	310.00	0.60	186.00
11/11/2019	JJR	Review/analyze affidavits attached to Training's counterclaim, begin outlining cross-examination questions of witnesses	310.00	0.80	248.00
11/11/2019	MAL	Various conferences and correspondence regarding TRO Motion and Panthera Training Answer/Counterclaim	340.00	2.00	680.00
11/12/2019	AS	Draft/revise Requests for Production of Documents to Panthera Training, LLC	145.00	0.80	116.00
11/12/2019	JJR	Draft/edit/revise discovery requests directed to Training	310.00	0.60	186.00
11/12/2019	MAL	Various conferences with John Richardson and Sarah Wenrich regarding status of preparation for 11/25 preliminary relief hearings	340.00	1.00	340.00
11/12/2019	MAL	Review and deliver documents in response to Panthera Training requests, and further review of Panthera Training's refusal to produce requested documents to Debtor	340.00	0.70	238.00
11/12/2019	SEW	Discuss pre-trial brief with Mark Lindsay and John Richardson	175.00	0.40	70.00
11/13/2019	MAL	Various review and analysis of answer and counterclaim pleadings and consideration of issues, legal authority, etc	340.00	2.50	850.00
11/14/2019	MAL	Review pleadings, documents, etc. and legal authority for brief preparation	340.00	2.00	680.00
11/14/2019	SEW	Research for and draft pre-trial memorandum	175.00	8.20	1,435.00
11/15/2019	JJR	Review/analyze email response and voluminous documents from Jim Punelli regarding responding to Training's counterclaim	310.00	1.20	372.00
11/15/2019	MAL	Telephone call with Jim Punelli regarding upcoming hearing on preliminary injunction	340.00	0.50	170.00
11/15/2019	MAL	Review correspondence and multiple documents addressing and refuting motion to dismiss/convert	340.00	2.00	680.00

		allegations			
11/15/2019	SEW	Proofread/revise pre-trial memorandum	175.00	0.80	140.00
11/15/2019	SEW	Review cases and laws cited in pre-trial memorandum and draft table of authorities	175.00	0.30	52.50
11/15/2019	SEW	Discuss Panthera adversary complaint exhibits with John Richardson	175.00	0.10	17.50
11/17/2019	JJR	Review/comment/revise pre-hearing brief and exhibit/witness list, confer with Mark Lindsay and Sarah Wenrich regarding same	310.00	1.20	372.00
11/17/2019	JJR	Draft/edit/revise objections and responses to Training's discovery requests, emails with Mark Lindsay and Sarah Wenrich regarding same	310.00	1.10	341.00
11/17/2019	MAL	Analyze, review and revise draft pre-trial brief and review and consider witness list and exhibits	340.00	4.00	1,360.00
11/18/2019	AS	Draft/revise/finalize Objections and Answers to Panthera Training, LLC's First Set of Interrogatories and Request for Production of Documents to Debtor	145.00	0.50	72.50
11/18/2019	AS	Draft/revise Letter to Counsel regarding Discovery Responses	145.00	0.10	14.50
11/18/2019	CNW	Finalize brief, draft exhibit and witness list, discussions with Mark Lindsay and John Richardson regarding the same, final revisions to same, file Brief, witness/exhibit list and exhibits with the Court	155.00	1.50	232.50
11/18/2019	JJR	Edit/finalize/serve objections and responses to Training's discovery requests, confer with Mark Lindsay regarding same	310.00	0.60	186.00
11/18/2019	JJR	Review/analyze Training's written responses and objections to Enterprises' discovery requests. and document production, confer with Mark Lindsay and Sarah Wenrich regarding same	310.00	1.50	465.00
11/18/2019	MAL	Review and revise pre-trial brief and memorandum	340.00	3.00	1,020.00
11/18/2019	SEW	Discuss pre-trial memorandum with John Richardson and Mark Lindsay and begin making suggested revisions	175.00	0.80	140.00
11/18/2019	SEW	Make final revisions to pre-trial memorandum and prepare exhibits to be filed	175.00	1.20	210.00
11/19/2019	AS	Preliminary review of Document Production of Panthera Training, LLC to determine what has been produced (3000+ pages)	145.00	1.20	174.00
11/19/2019	CNW	Initial draft of Answer to Counterclaim, send to Sarah Wenrich for review and revisions	155.00	0.90	139.50
11/19/2019	CNW	Review file and docket, gather documents for trial binders, instruct on the same	155.00	0.50	77.50
11/19/2019	CNW	Prepare binders with pleadings and exhibits in advance of trial preparation meeting with client	155.00	0.70	108.50
11/19/2019	JJR	Review/analyze Debra Allen's informal document request letter to Mark Lindsay	310.00	0.20	62.00
11/19/2019	JJR	Detailed review of Training's pre-hearing	310.00	1.30	403.00

		memorandum and exhibits; confer with Mark Lindsay and Sarah Wenrich regarding potential follow-up interrogatories and motion in limine to exclude non-injunctive claims and evidence			
11/19/2019	JJR	Thorough review of subcontract for any provision providing for offset of administrative fees against additional rent, confer with Mark Lindsay and Sarah Wenrich regarding same	310.00	0.50	155.00
11/19/2019	JJR	Review/comment/revise answer to counterclaim, confer with Mark Lindsay and Sarah Wenrich regarding same	310.00	0.60	186.00
11/19/2019	MAL	Review and revise draft answer to Training's answer and counterclaims, and various meetings regarding same	340.00	2.00	680.00
11/19/2019	MAL	Review Training's pretrial brief and various conferences with John Richardson and Sarah Wenrich regarding same and other pending issues	340.00	2.00	680.00
11/19/2019	MAL	Review various documents, exhibits and potential exhibits	340.00	1.00	340.00
11/19/2019	SEW	Draft answer to counterclaim and affirmative responses and documents as necessary to prepare such answer	175.00	3.10	542.50
11/19/2019	SEW	Discuss Panthera Training's pre-trial memorandum with John Richardson and Mark Lindsay	175.00	0.20	35.00
11/20/2019	CNW	Gather additional exhibits, instruct staff on preparing	155.00	0.50	77.50
11/20/2019	CNW	Finalize and file Answer to Counterclaim	155.00	0.30	46.50
11/20/2019	JJR	Prepare for and attend trial preparation meeting with Jim Punelli, confer with Mark Lindsay and Sarah Wenrich regarding discovery requests to WVEDA.	310.00	8.50	2,635.00
11/20/2019	MAL	Trial preparation meetings with J. Punelli, John Richardson and Sarah Wenrich	340.00	7.00	2,380.00
11/20/2019	SEW	Review John Richardson's revisions and comments to draft of answer to counterclaim and prepare documents for review with James Punelli	175.00	0.60	105.00
11/20/2019	SEW	Meeting with John Richardson and James Punelli to review and make necessary revisions to the answer to counterclaim	175.00	1.50	262.50
11/20/2019	SEW	Make final revisions to answer to counterclaim and email to John Richardson and Mark Lindsay for a final review	175.00	1.20	210.00
11/20/2019	SEW	Conference with John Richardson and Mark Lindsay regarding adversary proceeding strategy	175.00	0.30	52.50
11/20/2019	SEW	Begin draft of discovery requests for WVEDA	175.00	0.30	52.50
11/20/2019	SEW	Research regarding pre-trial motion for the evidentiary hearing	175.00	3.20	560.00
11/21/2019	AS	Discuss exhibits with Christina Wirick as part of planning strategy for November 25, 2019 Hearing	145.00	0.20	29.00
11/21/2019	AS	Review/analyze/compile key materials for attorney use during cross examination at upcoming TRO	145.00	1.70	246.50

		Hearing			
11/21/2019	CNW	Discuss trial preparations with Abigail Smith and coordination of the same	155.00	0.20	31.00
11/21/2019	CNW	Discuss further trial preparations with John Richardson and Abigail Smith	155.00	0.30	46.50
11/21/2019	CNW	Receive then review Debtor's answer to counterclaim and Training's response to the TRO Motion, send to client and internal team for review	155.00	0.30	46.50
11/21/2019	CNW	Receive then review numerous emails from opposing counsel containing 35 exhibits for intended use at trial	155.00	0.50	77.50
11/21/2019	JJR	Confer with Mark Lindsay regarding discovery, Training's response to motion for TRO, preparation for hearing and related issues	310.00	0.60	186.00
11/21/2019	MAL	Initial review of various exhibit copies received from Training's counsel	340.00	1.00	340.00
11/21/2019	SEW	Reviewing Panthera Training's pre-trial memorandum and various pleadings and draft motion in limine and order	175.00	3.60	630.00
11/22/2019	CNW	Prepare various trial exhibit binders, tables of contents, update existing binders for Mark Lindsay and John Richardson and review and prepare potential rebuttal exhibits in advance of trial	155.00	4.00	620.00
11/22/2019	JJR	Review/comment/revise motion in limine, confer with Mark Lindsay and Sarah Wenrich regarding same	310.00	1.40	434.00
11/22/2019	JJR	Hearing preparation meetings with Mark Lindsay and Christina Wirick	310.00	0.60	186.00
11/22/2019	MAL	Review and revise Motion in Limine and various other trial preparation	340.00	5.00	1,700.00
11/22/2019	SEW	Proofread/revise after Mark Lindsay's revisions and send to Christina Wirick for filing	175.00	0.20	35.00
11/23/2019	JJR	Review/analyze Training's response to Enterprises' motion for TRO/Injunction, research regarding various legal assertions made by Training therein, confer with Mark Lindsay regarding same	310.00	1.80	558.00
11/23/2019	JJR	Review final as-filed version of Enterprises' motion in limine; confer with Mark Lindsay regarding same	310.00	0.50	155.00
11/23/2019	JJR	Review FOIA documents related to explosives license issue	310.00	0.50	155.00
11/23/2019	JJR	Review Enterprises' discovery requests to WVEDA	310.00	0.20	62.00
11/23/2019	JJR	Review/analyze schedule of assets sold to SMI, confer with Mark Lindsay regarding same	310.00	0.30	93.00
11/23/2019	JJR	Outline and rehearse direct examination of Jim Punelli, review all exhibits to be used on direct, emails with Jim Punelli and Mark Lindsay regarding same	310.00	6.80	2,108.00
11/24/2019	JJR	Prepare for injunction hearing: outline and	310.00	4.20	1,302.00

		rehearse cross-examination of Bob Starer and Bill White; confer with Mark Lindsay regarding same			
11/24/2019	JJR	Telephone calls with Jim Punelli and Mark Lindsay regarding planning and preparation for injunction hearing	310.00	0.80	248.00
11/24/2019	JJR	Review/analyze all of Training's proposed hearing exhibits; incorporate same into cross-examination outlines	310.00	2.40	744.00
11/24/2019	JJR	Review/analyze all documents produced by Training in response to discovery requests	310.00	1.80	558.00
11/25/2019	JJR	Prepare and participate in preliminary injunction hearing; pre and post-hearing meetings with Jim Punelli and Mark Lindsay; travel to/from Wheeling, WV in connection with same	310.00	11.00	3,410.00
11/25/2019	MAL	Travel to and from Wheeling, meetings with client, and attend trial on preliminary injunction request	340.00	11.00	3,740.00
11/26/2019	JJR	Prepare and participate in preliminary injunction hearing; pre and post-hearing meetings with Jim Punelli and Mark Lindsay; travel to/from Wheeling, WV in connection with same	310.00	11.00	3,410.00
11/26/2019	MAL	Travel to and from Wheeling, meetings with client, and attend trial on preliminary injunction request	340.00	11.00	3,740.00
12/2/2019	JJR	Telephonic hearing with court regarding motion for preliminary injunction; telephone call with Mark Lindsay and Jim Punelli regarding same; meeting with Mark Lindsay regarding strategy	310.00	2.00	620.00
12/2/2019	MAL	Attend telephonic hearing on court's decision on preliminary injunction, various conferences with John Richardson and Telephone call with J. Punelli regarding same	340.00	2.00	680.00
12/4/2019	MAL	Various continuing discussions and meetings regarding potential agreement with Training, and review applicable contractual documents and correspondence	340.00	2.00	680.00
12/5/2019	JJR	Review/comment on draft motion for extension of time to file response to WVEDA motions	310.00	0.30	93.00
12/5/2019	JJR	Review/analyze Training's proposed consent order; confer with Mark Lindsay regarding same	310.00	0.40	124.00
12/5/2019	JJR	Review/analyze SNDA between WVEDA and Training, confer with Mark Lindsay regarding same	310.00	0.50	155.00
12/5/2019	MAL	Telephone call with Training's counsel, various conferences with John Richardson regarding status, and attend telephonic status conference on Training's injunctive relief request	340.00	2.50	850.00
12/5/2019	SEW	Discuss issue of irreparable harm and general status of the case with Mark Lindsay and John Richardson	175.00	0.40	70.00
12/6/2019	JJR	Telephone calls and emails with Jim Punelli and Mark Lindsay regarding Training's demand for assignment, wire of payment for SOCOM and related matters	310.00	0.80	248.00
12/6/2019	MAL	Various telephone calls and correspondence	340.00	3.00	1,020.00

		finalizing agreement with Training for December courses and payment, review contractual documents, correspondence and review and revise task order for delivery and conference with Training's counsel regarding status of same			
12/6/2019	SEW	Begin researching issue of irreparable harm	175.00	1.80	315.00
12/7/2019	JJR	Review/comment on WVEDA's objection to Enterprises' motion for extension to respond to motion to dismiss, confer with Mark Lindsay regarding same	310.00	0.50	155.00
12/7/2019	MAL	Research for brief in opposition to Training's request for preliminary injunction and begin draft of brief in opposition to said preliminary injunction request	340.00	4.00	1,360.00
12/7/2019	SEW	Complete research regarding issue of irreparable harm	175.00	1.20	210.00
12/8/2019	JJR	Review/comment on legal research regarding Training's request for preliminary injunctive relief, review/revise draft brief in opposition to same, conduct legal research for case authority to support brief, confer with Mark Lindsay and Sarah Wenrich regarding same	310.00	2.80	868.00
12/8/2019	MAL	Review and analyze additional legal authority and continuing drafting brief in opposition to Training's request for preliminary injunction	340.00	5.00	1,700.00
12/8/2019	SEW	Follow-up research regarding irreparable harm	175.00	0.50	87.50
12/9/2019	JJR	Review/analyze Judge Flatley decisions regarding irreparable harm, edit/revise brief in opposition to Training's request for preliminary injunctive relief, confer with Mark Lindsay and Sarah Wenrich regarding same	310.00	0.80	248.00
12/9/2019	JJR	Review/analyze Training's brief in support of request for preliminary injunctive relief, confer with Mark Lindsay regarding same	310.00	1.20	372.00
12/9/2019	MAL	Revise and finalize brief in opposition to Training's request for preliminary injunction, various conferences and correspondence regarding same	340.00	5.00	1,700.00
12/10/2019	JJR	Review/comment on email chains regarding Army training	310.00	0.30	93.00
12/20/2019	JJR	Review emails from Jim Punelli and confer with Mark Lindsay regarding global strategy with respect to PTC contracts	310.00	0.30	93.00
1/3/2020	MAL	Various correspondence and telephone calls regarding January task orders and agreement for performance	340.00	2.00	680.00
1/14/2020	JJR	Meeting with Mark Lindsay regarding redemption of property, refinancing options, plan submission and related matters	310.00	0.50	155.00
1/21/2020	JJR	Telephonic status conference with Judge Flatley and Mark Lindsay	310.00	0.50	155.00
1/21/2020	MAL	Review pleadings, status, and meet and prepare for status conference, and telephonic participation	340.00	2.00	680.00

		in same			
1/31/2020	MAL	Review correspondence regarding invoicing issues with government contracts, review related contract provisions and consider expeditious resolution	340.00	1.00	340.00
2/18/2020	MAL	Review adversary complaint filed by Bill Neff	350.00	0.70	245.00
2/24/2020	MAL	Various meetings and correspondence regarding ongoing government task order issues	350.00	2.00	700.00
2/25/2020	MAL	Prepare for and participate in telephone status conference on Training adversary proceeding	350.00	1.00	350.00
2/25/2020	MAL	Conferences with J. Punelli and John Richardson regarding various ongoing strategy issues and plan considerations and planning and review various correspondence regarding task order issues	350.00	2.00	700.00
2/25/2020	MAL	Further review of Neff Complaint and review and execute waiver of service and return to plaintiff's counsel	350.00	1.00	350.00
2/26/2020	JJR	Review/analyze new adversary proceeding filed by Neff, confer with Mark Lindsay regarding same	365.00	1.00	365.00
2/26/2020	MAL	Various correspondence and discussions and review and revise of documents regarding assignment of individual monetary claim under particular task orders	340.00	2.50	850.00
2/28/2020	MAL	Review and analyze Panthera Training profit and loss statements, various correspondence regarding same and review prior correspondence regarding contract revenue	350.00	2.00	700.00
3/3/2020	MAL	Review P&L statements provided by Panthera Training through January	350.00	1.00	350.00
3/4/2020	MAL	Various correspondence and discussions regarding mediation and defendant's motion to amend counterclaim	350.00	1.50	525.00
3/9/2020	CNW	Draft a stipulation of extension of time to respond to Motion to Amend Counter Claim and send to Mark Lindsay for review	175.00	0.60	105.00
3/9/2020	JJR	Review mediation order and confer with Mark Lindsay regarding same	365.00	0.30	109.50
3/9/2020	MAL	Review Motion to Amend Counterclaim and consider responses, review related documents and prior pleadings	350.00	1.00	350.00
3/9/2020	SEW	Discuss response to Panthera Training's motion to amend counterclaim with Mark Lindsay	210.00	0.20	42.00
3/9/2020	SEW	Review Motion to amend answer to counterclaim	210.00	0.30	63.00
3/10/2020	SEW	Begin researching issue of estoppel and the standard for amending a complaint	210.00	3.10	651.00
3/11/2020	SEW	Complete research and draft memorandum regarding Training's Motion for Leave to Amend Complaint	210.00	4.20	882.00
3/12/2020	SEW	Draft response in opposition to the Motion for Leave to Amend Counterclaim	210.00	1.30	273.00

3/12/2020	SEW	Proofread/revise response in opposition to Motion for Leave to Amend	210.00	0.40	84.00
3/16/2020	CNW	Finalize and file response to motion for leave to amend counterclaim	175.00	0.30	52.50
3/16/2020	MAL	Revise and finalize response to Defendant's Motion to Amend Counterclaim, review related pleadings and research	350.00	3.00	1,050.00
3/18/2020	MAL	Various discussions and correspondence regarding scheduled mediation and preparation for same, review pleadings and consider potential settlement offer	350.00	2.50	875.00
3/19/2020	CNW	Review updated Court procedures, send email to Judge Trumble's law clerk regarding the status of the mediation, send email to internal team regarding possible upcoming deadlines	175.00	0.40	70.00
3/23/2020	MAL	Various emails and discussions regarding rescheduling mediation and overall effects of Covid-19 circumstances on case proceedings	350.00	1.00	350.00
3/26/2020	MAL	Review new mediation scheduling order and discussions with client regarding same	350.00	0.70	245.00
4/14/2020	MAL	Various discussions and correspondence regarding status of mediation, review pleadings and related orders	350.00	1.00	350.00
4/14/2020	SMK	Emails to and from Mark Lindsay regarding plan and answer to complaint and draft answer to complaint	325.00	1.10	357.50
4/15/2020	CNW	Trade e-mail messages with Court regarding mediation date	175.00	0.20	35.00
4/15/2020	MAL	Emails and discussions regarding mediation status	350.00	0.50	175.00
4/15/2020	SMK	Draft answer to Neff Complaint	325.00	0.80	260.00
4/16/2020	SMK	Revise answer to Complaint	325.00	0.90	292.50
4/17/2020	SMK	Finalize answer for Panthera and email to Mark Lindsay regarding same	325.00	0.10	32.50
4/17/2020	SMK	Additional revisions to Panthera answer	325.00	0.50	162.50
4/20/2020	JJR	Telephone calls and emails to enlist local counsel for VA state court suit against Punelli and Jones	365.00	0.60	219.00
4/20/2020	MAL	Review Neff adversary complaint and discussions with Salene Mazur Kraemer and Neff counsel regarding same	350.00	2.00	700.00
4/20/2020	SMK	Email to and from Mark Lindsay regarding answer to adversary proceeding	325.00	0.10	32.50
4/20/2020	SMK	Final revisions to Answer and call with Mark Lindsay regarding same	325.00	0.70	227.50
4/21/2020	SMK	Further revisions to Answer and Declaratory judgment counter claim	325.00	0.50	162.50
4/22/2020	SMK	Final revisions to Answer to Neff Complaint	325.00	1.50	487.50
4/22/2020	SMK	Finalize answer to Neff Complaint, research standard for True Lease v. disguised financing, email to Mark Lindsay regarding same, review	325.00	4.90	1,592.50

		claims register and petition			
4/29/2020	SMK	Email to Mark Lindsay regarding answer and counterclaims to Neff complaint	325.00	0.10	32.50
5/1/2020	MAL	Review and revise Answer to Neff complaint and Telephone call with Salene Mazur Kraemer regarding same	350.00	2.00	700.00
5/1/2020	SMK	Call with Mark Lindsay regarding revisions to Complaint	325.00	0.30	97.50
5/1/2020	SMK	Further revisions to answers to complaint and call with Mark Lindsay	325.00	0.50	162.50
5/5/2020	MAL	Review and revise new matter to Neff complaint and Telephone call with Salene Mazur Kraemer regarding same	350.00	1.50	525.00
5/5/2020	SMK	Finalize answer for filing, email to Mark Lindsay regarding same, file Answer and serve parties regarding same	325.00	1.20	390.00
5/6/2020	CNW	Trade emails with the Court regarding new mediation date	175.00	0.20	35.00
5/7/2020	SMK	Call with Mark Lindsay regarding motion to dismiss	325.00	0.50	162.50
6/2/2020	MAL	E-mails and telephone call with Salene Mazur Kraemer regarding Neff adversary	350.00	0.50	175.00
6/4/2020	MAL	Review discovery requests and work on responses and objections and consideration of document productions	350.00	2.50	875.00
6/25/2020	MAL	Telephone call with J. Punelli regarding various outstanding issues and preparation of initial disclosures for Neff proceeding	350.00	1.00	350.00
6/25/2020	MAL	Prepare and transmit Rule 26 initial disclosures for Neff adversary proceeding	350.00	1.50	525.00
6/26/2020	MAL	Various communications regarding adversary scheduling and status of mediation and other issues	350.00	1.00	350.00
		TOTAL SERVICES RENDERED		331.80	97,526.00

TIMEKEEPER SUMMARY

Robert S. Bernstein	0.30 HRS @ $	550.00/hr =	165.00
Salene Mazur Kraemer	13.70 HRS @ $	325.00/hr =	4,452.50
Mark A. Lindsay	114.20 HRS @ $	340.00/hr =	38,828.00
Mark A. Lindsay	32.90 HRS @ $	350.00/hr =	11,515.00
John J. Richardson	91.70 HRS @ $	310.00/hr =	28,427.00
John J. Richardson	1.90 HRS @ $	365.00/hr =	693.50
Abigail L. Smith	4.60 HRS @ $	145.00/hr =	667.00
Sarah E. Wenrich	49.20 HRS @ $	175.00/hr =	8,610.00
Sarah E. Wenrich	9.50 HRS @ $	210.00/hr =	1,995.00
Christina N. Wirick	12.10 HRS @ $	155.00/hr =	1,875.50
Christina N. Wirick	1.70 HRS @ $	175.00/hr =	297.50
Totals	331.80	$	97,526.00

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	97,526.00
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**97,526.00**

For billing questions, please contact billing@bernsteinlaw.com or 412-456-8100
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Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV020
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Professional Retentions

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
9/16/2019	CNW	Begin drafting retention application	155.00	0.30	46.50
9/17/2019	CNW	Continue drafting retention application and send to Robert Bernstein for review	155.00	0.50	77.50
9/23/2019	CNW	Telephone call from Robert Bernstein regarding proposed order related to retention application, discuss revisions	155.00	0.20	31.00
9/23/2019	CNW	Finalize application to employ, send to client for review	155.00	0.30	46.50
9/23/2019	CNW	Draft certificate of service related to the retention application	155.00	0.20	31.00
9/23/2019	CNW	File Retention Application with the Court	155.00	0.20	31.00
9/23/2019	CNW	Receive then review ecf notice from court regarding the deadline for responses to be filed for the retention application, send email to internal team.	155.00	0.10	15.50
9/23/2019	RSB	Review and approve application for filing	550.00	0.30	165.00
		TOTAL SERVICES RENDERED		2.10	444.00

TIMEKEEPER SUMMARY

Robert S. Bernstein	0.30	HRS @ $	550.00/hr =	165.00
Christina N. Wirick	1.80	HRS @ $	155.00/hr =	279.00
Totals	2.10		$	444.00

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	444.00
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**444.00**

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www.bernsteinlaw.com

Panthera Enterprises, LLC
James Punelli
1900 Campus Commons Drive, Suite 100
Reston, Virginia 20191

File #: 2539-WV021
As of Date: 9/30/2020
** DRAFT **

Re:
In Re: Panthera Enterprises, LLC - Fee Applications

Terms: Net 30 days

For Services Rendered from Through

SERVICES RENDERED

DATE		DESCRIPTION OF SERVICES RENDERED	Rate	Hours	Amount
5/21/2020	CNW	Begin reviewing and editing time entries for fee application	175.00	1.20	210.00
5/21/2020	CNW	Continued review and revisions to time entries	175.00	1.40	245.00
5/21/2020	CNW	Further review and revisions to time entries	175.00	0.90	157.50
9/29/2020	CNW	Review of time entries	175.00	0.90	157.50
9/29/2020	CNW	Further review of time entries	175.00	0.40	70.00
9/30/2020	CNW	Draft, revise and finalize fee application, file the same with the Court, service the same upon all parties.	175.00	4.20	735.00
		TOTAL SERVICES RENDERED		9.00	1,575.00

TIMEKEEPER SUMMARY

Christina N. Wirick		9.00 HRS @ $	175.00/hr =	1,575.00
	Totals	9.00		$ 1,575.00

PREVIOUS BALANCE:	0.00
CURRENT CHARGES:	1,575.00
LESS PAYMENTS:	0.00
TOTAL AMOUNT DUE$	**1,575.00**

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1.5% finance charge per month for invoices over 30 days old
Tax I.D. Number 25-1441443