

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

	)	
In re:	)	Chapter 11
	)	
VYAIRE MEDICAL, INC., <i>et al.</i> , ¹	)	Case No. 24-11217 (BLS)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Hearing Date: March 5, 2025, at 10:30 a.m. (ET)
	)	Objection Deadline: February 5, 2025, at 4:00 p.m. (ET)

**SUMMARY OF FINAL FEE
APPLICATION OF COLE SCHOTZ P.C., DELAWARE
CO-COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD FROM JUNE 9, 2024 THROUGH NOVEMBER 14, 2024**

Name of Applicant:	Cole Schotz, P.C.
Authorized to provide professional services to:	Vyaire Medical, Inc., <i>et al.</i>
Date of retention:	July 30, 2024 (Effective as of June 9, 2024) [Docket No. 333]
Period for which compensation and reimbursement is sought:	June 9, 2024 through November 14, 2024
Amount of compensation sought as actual, reasonable and necessary:	\$3,131,085.00 ²
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$16,601.99
This is a(n):	___ monthly ___ interim <u>X</u> final application

¹ The last four digits of Debtor Vyaire Medical, Inc.'s federal tax identification number are 6495. A complete list of each of the Debtors in these chapter 11 cases and each such Debtor's federal tax identification number may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/Vyaire>. The location of Debtor Vyaire Medical, Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is 26125 North Riverwoods Boulevard, Mettawa, Illinois, USA 60045.

² As set forth in the *First Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and Reimbursement of expenses* [Docket No. 834], Cole Schotz agreed to a voluntary fee reduction of \$9,150.00. Cole Schotz also agreed with the Office of the United States Trustee for the District of Delaware to a voluntary fee reduction of \$204.50 during the Final Fee Period.

Prior Interim Fee Application:

Application Docket No. Date Filed	Interim Fee Period	Approved Fees and Expenses
Docket No. 715 11/08/24	6/9/2024 – 8/31/2024	\$1,548,894.48

Prior Monthly Fee Applications:

Monthly Application		Requested Fees and Expenses		Approved Fees and Expenses		Holdback
Monthly Fee Period, Application Docket No., and Date Filed	CNO Docket No. and Date Filed	Total Fees Requested	Total Expenses Requested	Approved Fees (80%)	Approved Expenses (100%)	Fees Holdback (20%)
06/09/24 – 06/30/24 Docket No. 355 08/08/24	Docket No. 488 08/30/24	\$649,519.50	\$3,085.71	\$519,615.60	\$3,085.71	\$129,903.90
07/01/24 – 07/31/24 Docket No. 510 09/06/24	Docket No. 594 10/01/24	\$489,621.00	\$1,494.81	\$391,696.80	\$1,494.81	\$97,924.20
08/24/24 – 08/31/24 Docket No. 568 09/24/24	Docket No. 639 10/17/24	\$413,078.00	\$1,449.96	\$330,462.40	\$1,449.96	\$82,615.60
09/01/24 – 09/30/24 Docket No. 717 11/11/24	Docket No. 816 12/04/24	\$739,539.50	\$8,543.18	\$591,631.60	\$8,543.18	\$147,907.90
10/01/24 – 10/31/24 Docket No. 753 11/15/24	Docket No. 831 12/09/24	\$594,117.50	\$934.16	\$475,294.00	\$934.16	\$118,823.50
11/01/24 – 11/14/24 Docket No. 845 12/17/24	Docket No. 931 01/15/24	\$254,564.00	\$1,094.17	\$203,651.20	\$1,094.17	\$50,912.80

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

	)	
In re:	)	Chapter 11
	)	
VYAIRE MEDICAL, INC., <i>et al.</i> , ¹	)	Case No. 24-11217 (BLS)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Hearing Date: March 5, 2025, at 10:30 a.m. (ET)
	)	Objection Deadline: February 5, 2025, at 4:00 p.m. (ET)

**FINAL FEE APPLICATION OF COLE SCHOTZ P.C., DELAWARE
CO-COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD FROM JUNE 9, 2024 THROUGH NOVEMBER 14, 2024**

Cole Schotz P.C. (the “Applicant” or “Cole Schotz”), Delaware co-counsel to Vyaire Medical, Inc. and certain of its subsidiaries, the debtors and debtors in possession in the above captioned cases (collectively, the “Debtors”), hereby submits this final fee application (the “Application”) pursuant to (i) sections 330 and 331 of title 11 of the United State Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), (ii) Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (iii) Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), (iv) the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Docket No. 218] (the “Interim Compensation Order”); and (v) the *Order Appointing Fee Examiner and Establishing Related Procedures for the Review of Fee Applications*

¹ The last four digits of Debtor Vyaire Medical, Inc.’s federal tax identification number are 6495. A complete list of each of the Debtors in these chapter 11 cases and each such Debtor’s federal tax identification number may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/Vyaire>. The location of Debtor Vyaire Medical, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 26125 North Riverwoods Boulevard, Mettawa, Illinois, USA 60045.

of Retained Professionals [Docket No. 690] (the “Fee Examiner Order”),² for allowance of compensation for services rendered and reimbursement of expenses for the period from June 9, 2024 through November 14, 2024 (the “Final Fee Period”). In support of this Application, Cole Schotz respectfully represents as follows:

Jurisdiction and Venue

1. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. §1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the “Court”) under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. The Debtors confirm their consent, pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief sought herein are sections 330 and 331 of the Bankruptcy Code. Such relief is also warranted under Bankruptcy Rule 2016, Local Rule 2016-2, the Interim Compensation Order, the Fee Examiner Order, the Plan, and the Confirmation Order (as defined herein).

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order, the Fee Examiner Order, or the *Second Amended Joint Chapter 11 Plan of Vyair Medical, Inc. and Its Debtor Affiliates* [Docket No. 719] (the “Plan”), as applicable.

Background

A. The Chapter 11 Cases

4. On June 9, 2024 (the “Petition Date”), Vyaire Medical, Inc. and certain of its subsidiaries filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their business and managing their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On June 11, 2024, the Court entered an order authorizing the procedural consolidation and joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1. *See* Docket No. 84.

6. No request for the appointment of a trustee or examiner has been made in these chapter 11 cases.

7. On June 26, 2024, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors (the “Committee”). *See* Docket No. 121.

8. A detailed description of the Debtors and their business, including the facts and circumstances giving rise to the Debtors’ chapter 11 cases, is set forth in the *Declaration of John Bibb, Group Chief Executive Officer of Vyaire Medical, Inc., in Support of Chapter 11 Petitions and First Day Motions*. *See* Docket No. 15.

B. The Retention of Cole Schotz

9. On July 9, 2024, the Debtors applied to the Court for an order authorizing the retention and employment of Cole Schotz as Debtors’ Delaware co-counsel effective as of the Petition Date. *See* Docket No. 239. On July 30, 2024, the Court entered an order authorizing such retention. *See* Docket No. 333.

C. The Interim Compensation Order

10. The Interim Compensation Order sets forth the procedures for final allowance of compensation and reimbursement of expenses in these chapter 11 cases. Specifically, the Interim Compensation Order provides that Professionals shall file final applications for compensation and reimbursement (collectively, the “Final Fee Applications”) by such deadline as may be established in a confirmed chapter 11 plan or in an order of the Court. *See* Interim Compensation Order ¶ 2(i). All Final Fee Applications shall comply with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and applicable orders of the Court. *Id.*

D. The Plan and Confirmation Order

11. On November 11, 2024, the Debtors filed the Plan.

12. On November 14, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving the Debtors’ Disclosure Statement For, and Confirming the Second Amended Joint Chapter 11 Plan of Vyair Medical, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 745] (the “Confirmation Order”).

13. On November 27, 2024 (the “Effective Date”), the Debtors filed the *Notice of (I) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Related Bar Dates* [Docket No. 810], (the “Effective Date Notice”), and the Plan became effective in accordance with its terms.

14. Pursuant to the confirmed Plan, and as set forth in the Effective Date Notice, the deadline to file final requests for payment of Professional Fee Claims is January 27, 2025 (the “Professional Fee Application Deadline”), which is the first Business Day that is sixty (60) days after the Effective Date. All professionals must file final requests for payment of Professional Fee Claims by no later than the Professional Fee Application Deadline to receive final approval of the fees and expenses incurred in these chapter 11 cases.

Relief Requested

15. By this Application, and pursuant to the Interim Compensation Order, the Plan, and section 331 of the Bankruptcy Code, Cole Schotz is seeking compensation in the amount of \$3,131,085.00 in fees for professional services rendered by Cole Schotz during the Final Fee Period. This amount is derived solely from the applicable hourly billing rates of Cole Schotz personnel who rendered such services to the Debtors. In addition, Cole Schotz is seeking reimbursement of expenses incurred during the Final Fee Period in the amount of \$16,601.99.

**The Final Fee Application
and Compliance with Guidelines**

16. This Application was prepared in accordance with (a) Local Rule 2016-2, (b) the United States Trustee *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, adopted on June 11, 2013* (the “UST Guidelines”), and (c) the Interim Compensation Order (collectively with Local Rule 2016-2 and the UST Guidelines, the “Guidelines”).

17. Annexed hereto are various schedules required by the Guidelines, as applicable.

18. Applicant provides the following responses to the questions set forth under ¶ C.5 of Appendix B of the UST Guidelines.

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Response: No.

Question: If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: The fees sought in this Application are less than the amount budgeted for the Final Fee Period.

Question: Have any of the professionals included in this fee application varied their hourly rates based on the geographic location of the bankruptcy case.

Response: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? If so, please quantify by hours and fees.

Response: This Application does not include any fees dedicated to revising time records or preparing and revising invoices that would not normally be compensable outside of bankruptcy.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: Does this fee application include rate increases since retention?

Response: Yes. On September 1, 2024, Cole Schotz increased its rates in accordance with its standard practice and such rates are included herein.

Reasonable and Necessary Services

19. The services for which Cole Schotz seeks compensation were, at the time rendered, necessary for, beneficial to, and in the best interests of the Debtors and the Debtors' estates. The services rendered were consistently performed in a timely manner commensurate with the complexity, importance and nature of the issues involved. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Applicant is fair and reasonable given (a) the complexity of these cases, (b) the time

expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

Notice

20. Cole Schotz will provide notice and serve this Application on the Application Recipients (as defined and set forth in the Interim Compensation Order) and the Fee Examiner. In light of the nature of the relief requested in this Application, Cole Schotz submits that no other or further notice is required.

No Prior Request

21. No prior request for the relief sought in the Application has been made to this or any other court.

Certification of Compliance and Waiver

22. The undersigned representative of Cole Schotz certifies that he has reviewed the requirements of Local Rule 2016-2, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-2, Cole Schotz believes that such deviations are not material and respectfully requests that any such requirements be waived.

[Remainder of Page Intentionally Left Blank]

Conclusion

WHEREFORE, Cole Schotz respectfully requests the Court enter an order (a) approving the Application; (b) awarding Cole Schotz compensation for the Final Fee Period in the amount of \$3,131,085.00 and reimbursement for actual and necessary expenses in the amount of \$16,601.99; (c) authorizing the payment of such sums to Cole Schotz; and (d) granting such other and further relief as the Court may deem just and proper.

Dated: January 15, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
500 Delaware Avenue, Suite 1410
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com

- and -

Michael D. Sirota, Esq. (admitted *pro hac vice*)
Warren A. Usatine, Esq (admitted *pro hac vice*)
Court Plaza North, 25 Main Street
Hackensack, New Jersey 07601
Telephone: (201) 489-3000
Facsimile: (201) 489-1536
Email: msirota@coleschotz.com
wusatine@coleschotz.com

*Co-Counsel to the Debtors
and Debtors in Possession*

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
601 Lexington Ave
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: joshua.sussberg@kirkland.com

- and -

Spencer A. Winters, P.C. (admitted *pro hac vice*)
Yusuf U. Salloum (admitted *pro hac vice*)
333 West Wolf Point Plaza
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: spencer.winters@kirkland.com
yusuf.salloum@kirkland.com

*Co-Counsel to the Debtors
and Debtors in Possession*

VYAIR MEDICAL, INC., ET AL.**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES**

The aggregate hourly rate for all Cole Schotz Delaware, New Jersey and New York non-bankruptcy timekeepers (including both attorneys and paralegals) (the “Non-Bankruptcy Blended Rate”) for the year ending December 31, 2023 (the “Comparable Period”) was \$545.85 per hour, and the aggregate hourly rate for all Cole Schotz Delaware, New Jersey and New York bankruptcy timekeepers (including both attorneys and paralegals) (the “Bankruptcy Blended Rate”) for the Comparable Period was \$637.37 per hour.

The blended hourly rate for all Cole Schotz timekeepers (including both attorneys and paralegals) who provided services to the Debtors during the Final Fee Period was approximately \$668.04 per hour.

Category of Timekeeper	2023 Bankruptcy Blended Rate	2023 Non-Bankruptcy Blended Rate	Final Fee Period Blended Rate
Member	\$765.64	\$665.22	\$777.02
Special Counsel	N/A	\$673.65	\$644.64
Associate	\$475.36	\$421.60	\$517.05
Paralegal	\$356.74	\$335.20	\$386.70
Aggregate	\$637.37	\$545.85	\$668.04

VYAIR MEDICAL, INC., ET AL.**BUDGET AND BILLING BY PROJECT CATEGORY**
JUNE 9, 2024 THROUGH NOVEMBER 14, 2024

Project Category	Budgeted Hours	Budgeted Fees	Total Hours	Total Fees
Asset Acquisitions/Business Combinations	10.0	\$6,350.00	0.7	\$1,032.50
Asset Analysis and Recovery	5.0	\$3,175.00	0.4	\$340.00
Asset Dispositions, Sales, Uses, and Leases	350.0	\$222,250.00	299.9	\$188,447.50
Automatic Stay Matters/Litigation	25.0	\$15,875.00	8.1	\$5,904.50
Business Operations	10.0	\$6,350.00	12.7	\$9,457.00
Case Administration	300.0	\$190,500.00	275.2	\$185,143.00
Cash Collateral and DIP Financing	40.0	\$25,400.00	29.9	\$20,434.00
Claims Analysis, Administration and Objections	25.0	\$15,875.00	18.4	\$11,769.50
Committee Matters and Creditor Meetings	10.0	\$6,350.00	1.0	\$786.00
Creditor Inquiries	10.0	\$6,350.00	3.3	\$2,650.50
Disclosure Statement/Voting Issues	140.0	\$88,900.00	132.2	\$88,276.50
Document Review	5.0	\$3,175.00	0.8	\$920.00
Document Review/Committee Investigation	5.0	\$3,175.00	0.6	\$690.00
Employee Matters	25.0	\$15,875.00	17.9	\$12,435.00
Executory Contracts	125.0	\$79,375.00	111.9	\$78,705.00
Fee Application Matters/Objections	100.0	\$63,500.00	99.4	\$53,695.50
Foreign Law/Proceedings/Regs; Non-Debtor Affiliate JV Matter	5.0	\$3,175.00	1.0	\$900.00
General	10.0	\$6,350.00	9.5	\$4,889.50
General Corporate	5.0	\$3,175.00	0.4	\$284.00
Leases (Real Property)	25.0	\$15,875.00	16.7	\$9,999.50
Litigation/Gen. (Except Automatic Stay)	75.0	\$47,625.00	59.8	\$46,809.00
Other Investigative Matters	1,725.0	\$1,095,375.00	1,697.9	\$1,128,503.00
Preparation for and Attendance at Hearings	175.0	\$111,125.00	155.6	\$90,561.00
Reorganization Plan	475.0	\$301,625.00	468.9	\$346,575.50
Reports, Statements and Schedules	50.0	\$31,750.00	50.9	\$33,686.50
Retention Matters	110.0	\$69,850.00	104.4	\$54,359.50
Rule 2004 Motions and Subpoenas	1,000.0	\$635,000.00	1,004.9	\$684,689.50
Tax/General	20.0	\$12,700.00	10.5	\$6,758.50
U.S. Trustee Matters and Meetings	35.0	\$22,225.00	31.3	\$15,268.50
Utilities/Sec. 366 Issues	10.0	\$6,350.00	5.5	\$3,682.00
Valuation	5.0	\$3,175.00	0.5	\$402.50
Vendor Matters	75.0	\$47,625.00	70.8	\$52,384.50
TOTAL	4,985.0	\$3,165,475.00	4,701.0	\$3,140,439.50
VOLUNTARY REDUCTION AGREED TO WITH U.S. TRUSTEE AND FEE EXAMINER				9,354.50
TOTAL WITH REDUCTIONS				3,131,085.00

**SUMMARY OF BILLING BY PROFESSIONAL
JUNE 9, 2024 THROUGH NOVEMBER 14, 2024**

Attorney Name	Year Admitted	Position (Department)	Hourly Billing Rate	Total Hours Billed	Total Compensation
Michael D. Sirota	1986	Member (Bankruptcy)	\$1,475.00	11.1	\$16,372.50
			\$1,575.00	12.0	\$18,900.00
Warren A. Usatine	1995	Member (Bankruptcy & Litigation)	\$1,150.00	55.6	\$63,940.00
			\$1,250.00	20.8	\$26,000.00
Steven L. Klepper	1993	Member (Litigation)	\$875.00	180.2	\$157,675.00
			\$960.00	17.8	\$17,088.00
Felice Yudkin	2005	Member (Bankruptcy)	\$940.00	0.6	\$564.00
J. Jeffrey Cash	2003	Member (Corporate)	\$875.00	75.9	\$66,412.50
			\$960.00	3.0	\$2,880.00
Patrick J. Reilley	2003	Member (Bankruptcy)	\$805.00	179.7	\$144,658.50
			\$900.00	198.6	\$178,740.00
Jason R. Melzer	2001	Member (Litigation)	\$800.00	199.3	\$159,440.00
			\$875.00	77.6	\$67,900.00
Daniel J. Harris	2008	Member (Bankruptcy)	\$850.00	89.2	\$75,820.00
Jamie Clare	1994	Member (Litigation)	\$780.00	75.5	\$58,890.00
			\$800.00	129.2	\$103,360.00
Stacy L. Newman	2007	Member (Bankruptcy)	\$725.00	130.8	\$94,830.00
			\$800.00	109.8	\$87,840.00
Rachel A. Mongiello	2010	Member (Litigation)	\$650.00	179.3	\$116,545.00
			\$730.00	167.9	\$122,543.00
Matteo Percontino	2010	Member (Bankruptcy)	\$710.00	383.7	\$272,427.00
Megan B. Kilzy	2010	Member (Litigation)	\$625.00	148.5	\$92,812.50
			\$700.00	69.6	\$48,720.00
Marissa A. Mastrianni	2015	Member (Employment & Litigation)	\$700.00	8.0	\$5,600.00
Krista L. Kulp		Member (Bankruptcy)	\$600.00	81.8	\$49,080.00
H.C. Jones, III	2016	Member (Bankruptcy & Litigation)	\$540.00	98.5	\$53,190.00
			\$650.00	9.1	\$5,915.00
Jamie A. Quick	2001	Special Counsel (Litigation)	\$620.00	71.5	\$44,330.00
			\$700.00	163.3	\$114,310.00
Brandon M. Fierro	2012	Special Counsel (Litigation)	\$560.00	86.0	\$48,160.00

Attorney Name	Year Admitted	Position (Department)	Hourly Billing Rate	Total Hours Billed	Total Compensation
Andreas A. Apostolides	2013	Associate (Tax)	\$580.00	49.3	\$28,594.00
			\$650.00	60.0	\$39,000.00
Ian R. Phillips	2015	Associate (Litigation)	\$550.00	88.8	\$48,840.00
			\$650.00	137.9	\$89,635.00
Michael E. Fitzpatrick	2022	Associate (Bankruptcy)	\$500.00	265.9	\$132,950.00
			\$575.00	227.0	\$130,525.00
Jack M. Dougherty	2021	Associate (Bankruptcy)	\$575.00	28.6	\$16,445.00
Marian A. Bekheet	2015	Associate (Tax)	\$480.00	84.0	\$40,320.00
			\$565.00	53.8	\$30,397.00
Patrick E. Parrish	2019	Associate (Real Estate)	\$550.00	6.2	\$3,410.00
Arjun Padmanabhan	2022	Associate (Litigation)	\$385.00	50.5	\$19,442.50
			\$455.00	63.0	\$28,665.00
Melissa M. Hartlipp	2022	Associate (Bankruptcy)	\$385.00	38.9	\$14,976.50
			\$430.00	19.1	\$8,213.00
Adam H. Bouvier	2023	Associate (Corporate)	\$350.00	28.7	\$10,045.00
			\$415.00	92.5	\$38,387.50
Dalila E. Haden	2023	Associate (Litigation)	\$350.00	33.4	\$11,690.00
			\$415.00	46.3	\$18,837.50
Patt Feuerbach	N/A	Senior eDiscovery Analyst	\$435.00	12.8	\$5,568.00
			\$455.00	1.5	\$682.50
Amanda M. Cook	N/A	Litigation Support	\$510.00	9.6	\$4,896.00
			\$535.00	3.0	\$1,605.00
Carinda E. Hardison	N/A	Litigation Support	\$425.00	1.2	\$510.00
Larry S. Morton	N/A	Paralegal (Bankruptcy)	\$380.00	172.2	\$65,436.00
			\$400.00	70.8	\$28,320.00
Pauline Ratkowiak	N/A	Paralegal (Bankruptcy)	\$385.00	6.9	\$2,656.50
			\$405.00	12.3	\$4,981.50
Christine M. Challis	N/A	Paralegal (Litigation)	\$315.00	0.2	\$63.00
Caroline De Courcey	N/A	Legal Practice Assistant	\$150.00	2.7	\$405.00
VOLUNTARY REDUCTION AGREED TO WITH U.S. TRUSTEE AND FEE EXAMINER				N/A	\$9,354.50
TOTAL				4,107.0	\$3,131,085.00

Total Requested Compensation (with voluntary reduction): **\$3,131,085.00**
 Total Attorney Compensation: **\$3,025,316.00**
 Blended Rate All Attorneys: **\$686.36**
 Blended Rate All Timekeepers: **\$668.04**

VYAIR MEDICAL, INC., ET AL.**SUMMARY OF BILLING BY EXPENSE CATEGORY
JUNE 9, 2024 THROUGH NOVEMBER 14, 2024**

Expense Category	Service Provider (if applicable)	Total Expenses
Photocopying/Printing/Scanning (6,592 pages @ \$0.10 per page)		\$659.20
Outside Photocopying	Reliable/Parcels	\$3,191.46
Delivery/Couriers	Reliable/Parcels	\$5,928.80
Court Fees	PACER Service Center	\$1,383.90
Filing Fees	U.S. Bankruptcy Court; U.S. District Court	\$550.00
Datahost	Relativity	\$559.00
Luncheon/Dinner Conferences for Hearings		\$1,545.15
Transcripts	Reliable/Parcels	\$1,919.90
Online Research	Westlaw/LexisNexis	\$864.58
TOTAL		\$16,601.99

VYAIR MEDICAL, INC., ET AL.

**STAFFING PLAN FOR COLE SCHOTZ P.C.
JUNE 9, 2024 – NOVEMBER 14, 2024**

ALL FIGURES ARE ESTIMATES

Category of Timekeeper	Estimated Number of Timekeepers Expected to Work on Matters During the Budget Period	Average Hourly Rate
Members & Special Counsel	18	\$750.00
Associates	10	\$480.00
Paralegals	2	\$380.00
	Estimated Blended Hourly Rate:	\$635.00

SUMMARY OF FINAL FEE APPLICATION	
Name of Applicant	Cole Schotz P.C.
Name of Client	Vyaire Medical, Inc., <i>et al.</i>
Fee period covered by Application	June 9, 2024 through November 14, 2024
Total compensation sought during Final Fee Period	\$3,131,085.00
Total expenses sought during Final Fee Period	\$16,601.99
Petition Date	June 9, 2024
Retention Date	June 9, 2024
Date of order approving employment	July 30, 2024
Total compensation and expenses approved by interim order to date	\$1,548,894.48
Total allowed compensation paid to date	\$1,539,539.98
Total allowed expenses paid to date	\$9,477.34
Blended rate in Application for all Attorneys	\$686.36
Blended rate in Application for all Timekeepers	\$668.04
Compensation sought in this Application already paid pursuant to a monthly compensation order but not yet allowed	\$1,333,657.00
Expenses sought in this Application already paid pursuant to a monthly compensation order but not yet allowed	\$9,477.34
Number of professionals included in this Application	35
If applicable, number of professionals in this Application not included in staffing plan	N/A
If applicable, difference between fees budgeted and compensation sought for this Final Fee Period	Budgeted: \$3,165,475.00 Difference: (\$34,390.00)
Number of professionals billing fewer than 15 hours to the case during this Final Fee Period:	8
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this Application using the rates originally disclosed in the retention application:	Cole Schotz increased its rates on September 1, 2024. ¹ Without such rate increase, the total fees sought in this Application would have been \$3,075,801.50.

¹ See *Notice of Increase of the Hourly Rates of Professionals* [Docket No. 490].