

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: EXPRESS GRAIN TERMINALS, LLC¹
Debtor

CHAPTER 11
CASE NO. 21-11832-SDM

FIRST APPLICATION FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF NECESSARY EXPENSES
FOR THE LAW OFFICES OF CRAIG M. GENO, PLLC
[Sale Issues]

COMES NOW the Law Offices of Craig M. Geno, PLLC (“Applicant”), and files this its *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC [Sales Issues]* (the “Application”), counsel for the Debtor, and in support thereof, would show as follows:

1. Debtor initiated this Chapter 11 case by the filing a Voluntary Petition on September 29, 2021. Subsequent thereto, the Debtor has been, and is, the duly qualified, and acting Debtor-in-Possession in this Chapter 11 case. The Debtor is in control of its assets and is managing and operating the Debtor-in-Possession’s businesses.

2. On December 14, 2021, an Order [DK #1466] approving the employment of the Law Offices of Craig M. Geno, PLLC, as attorneys for the Debtor was entered by the Court.

3. The substantial services rendered to the Debtor and the expenses incurred by Applicant benefitted the estate. An Affidavit reflecting said legal services rendered and expenses incurred is attached hereto as **Exhibit “A”**. The Affidavit also certifies and represents to the Court that the services rendered to the Debtor were reasonable and necessary and that said services have actually been rendered. A detailed itemization of such services and expenses is attached as **Exhibit “B”** and incorporated by reference.

¹Jointly administered with *In re Express Biodiesel, LLC*, Case No. 21-11834-SDM and *In re Express Processing, LLC*, Case No. 21-11835-SDM.

4. The Debtor made the decision relatively early on in this case that its assets should be marketed, and then sold, at the appropriate time. The Debtor, and its chief restructuring firm, CR3 Partners, LLC (“CR3”), and Dennis Gerrard, the actual designated Chief Restructuring Officer (the “CRO”), actively marketed substantially all of the assets of the Debtor, entertained prospective purchasers, gathered and compiled non-disclosure agreements, conducted site visits and negotiations with respect to the sale of substantially all of the assets of the Debtor.

5. Those efforts culminated in an order, after an auction was held, approving the sale of substantially all of the assets of the Debtor (the “Sale Order”). The Sale Order was entered on April 11, 2022, and appears at Docket Number 2708, and is incorporated herein by reference.

6. As noted in prior pleadings that have been filed with this Court, UMB Bank, N.A. (“UMB”) has agreed to provide a payment to the Debtor in the form of a surcharge with respect to the efforts of Debtor’s counsel and CR3 regarding the efforts they made and incurred that resulted in the entry of the Sale Order.

7. The surcharge will be paid by UMB to Debtor’s counsel, Applicant here, and to CR3 (which is filing a separate application for compensation to be paid from the same \$400,000 surcharge).

8. Accordingly, in order to reflect only those services rendered, and expenses incurred, with respect to the sale of substantially all of the assets of the Debtor, the auction in connection therewith, the sale hearing, the entry of the order and the follow up work necessary to eventually get to a closing (which has not yet occurred), Applicant prepares this separate Application limited only to fees and expenses incurred in connection with the sale of substantially all of the assets of the Debtor.

9. The fees and expenses charged and incurred represent reasonable and necessary fees and expenses that were required to be extended by Applicant to the Debtor in all matters in connection with the sale of substantially all of the assets of the Debtor, case administration of the sale of assets and to protect and preserve all rights of the Debtor and the interests of creditors in furtherance of the counsel's obligations herein; and they represent normal and customary fees and expenses incurred and charged for representation of debtors in similar cases for asset sales. The time, skill and experience utilized by counsel for the Debtor justify the approval of the Application.

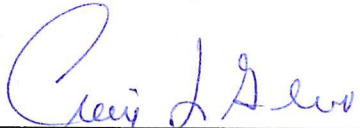
5. This is the Applicant's first request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from October 18, 2021, to and including April 29, 2022, and is for the sum of \$85,629.62 (\$84,257.50 in fees and \$1,372.12 in expenses), limited to fees and expenses incurred with respect to the sale of substantially all of the Debtor's assets. Applicant's rate through December 3, 2022, is \$400 per hour; it increased to \$450 per hour as of January 1, 2022.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys' fees for the professional services rendered herein and authorizing and directing UMB to pay said attorneys' fees and expenses as a surcharge not to exceed \$400,000 for Applicant and CR3. Applicant prays for general relief.

THIS, the 29th day of April, 2022.

Respectfully submitted,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
LAW OFFICES OF CRAIG M. GENO, PLLC
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Ridgeland, MS 39157
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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Abigail M. Marbury, Esq.
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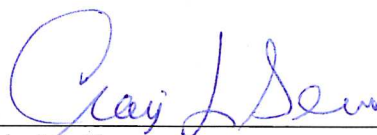
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Kristina M. Johnson, Esq.
kjohnson@joneswalker.com

Mr. Dennis Gerard
dennis.gerrard@cr3partners.com

THIS, the 29th day of April, 2022.



Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: EXPRESS GRAIN TERMINALS, LLC
Debtor**

**CHAPTER 11
CASE NO. 21-11832-SDM**

EXHIBIT “A”

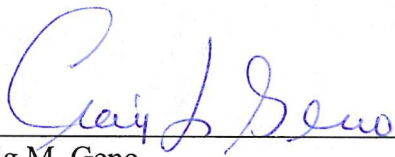
IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: EXPRESS GRAIN TERMINALS, LLC
Debtor

CHAPTER 11
CASE NO. 21-11832-SDM

AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno, one of the attorneys for the Debtor, who after having been first by me duly sworn, stated on oath that this Affidavit is submitted in support of the *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC [Sale Issues]* (the "Application"), Debtor's counsel, that the statements which are attached to the Application as Exhibit "B" represent a detailed statement of reasonable fees and expenses. Affiant hereby makes application for payment of reasonable attorney's fees and necessary expenses.

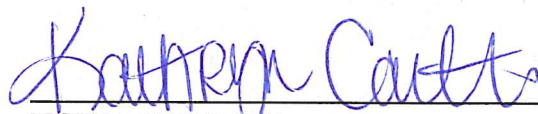


Craig M. Geno

STATE OF MISSISSIPPI
COUNTY OF Madison

SWORN TO AND SUBSCRIBED BEFORE ME, this the 29th day of April, 2022.





NOTARY PUBLIC

MY COMMISSION EXPIRES June 21, 2025

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: EXPRESS GRAIN TERMINALS, LLC
Debtor**

**CHAPTER 11
CASE NO. 21-11832-SDM**

EXHIBIT "B"

Law Offices of Craig M. Geno, PLLC

587 Highland Colony Parkway
Ridgeland, MS-Mississippi 39157 USA

Ph:601-427-0048

Fax:601-427-0050

Express Grain Terminals, LLC
2015 River Road Extd
Greenwood, MS-Mississippi
38930 USA

April 29, 2022

Attention: John Coleman

File #: 322003

Inv #: 347638

RE: Sales

DATE	TASK CODE	ACTIVITY CODE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Oct-18-21	B130	A104	Review memos to/from CRO and WM Gilliam regarding interest in facility	0.20	80.00	CMG
Oct-20-21	B130	A106	Telephone conference with Mr. Coleman regarding potential investors, sale process; expenses to be paid and CV supplies	0.75	300.00	CMG
	B130	A104	Review memos to/from Ira Perlmutter, Mr. Gerrard regarding expression of sale interests	0.20	80.00	CMG
Oct-21-21	B130	A104	Review memos to/from Ira Perlmutter; CRO regarding interest in purchasing/investing	0.20	80.00	CMG
	B185	A104	Review memos to/from Mr. Coleman regarding sale timing; alternate grain sources	0.20	80.00	CMG
Oct-26-21	B130	A104	Review memos to/from Collin Schumacher regarding interest in assets, and direction to Mr. Gerrard	0.20	80.00	CMG
Nov-01-21	B130	A104	Review memos to/from Jacob Eberhart concerning contract or interest in purchase issues	0.10	40.00	CMG
	B185	A107	Telephone conference with Charlie Swayze III regarding update on status of	0.35	140.00	CMG

			entire case, contract assumptions, sale of business, email traffic and related matters			
Nov-04-21	B130	A104	Review draft NDA and review memos to/from Mr. Gerrard regarding same	0.55	220.00	CMG
Nov-08-21	B130	A104	Review memos to/from Mr. Coleman regarding sale/refi alternatives	0.20	80.00	CMG
	B130	A108	Conference call with CR3 regarding sale and other options to exit case	0.75	300.00	CMG
Nov-10-21	B110	A104	Review Teaser program	0.25	100.00	CMG
Nov-11-21	B130	A104	Review memos to/from Mr. Gerrard, review Anderson NDA and comment on its lack of "non-tampering" with current employees during due diligence period	0.65	260.00	CMG
Nov-15-21	B130	A104	Review memos to/from Dennis Gerrard, Chris Archer, review markup of NDA with Mr. Archer's interested party and respond to inquiry from Mr. Gerrard	0.25	100.00	CMG
	B130	A104	Review memos to/from Mr. Gerrard regarding site visits and changes of plans	0.20	80.00	CMG
	B130	A103	Work on NDA	0.45	180.00	CMG
Nov-18-21	B130	A104	Review memo from Colby Gibbins; Review marked up NDA	0.25	100.00	CMG
Dec-17-21	B130	A104	Review memos to/from Nico Nesenoff at Philco regarding possible sale strategy and related matters	0.20	80.00	CMG
Dec-22-21	B130	A104	Review letter from David Rounsavall regarding interest in Express Grain facilities	0.20	80.00	CMG
	B130	A103	Dictation of letter to David Rounsavall regarding interest in facilities	0.20	80.00	CMG
	B130	A103	Dictation of letter to Mr. Gerrard regarding contact with David Rounsavall as to exploring his clients interest in asset purchase	0.20	80.00	CMG

Jan-07-22	B130	A104	Review memos to/from Doug Noble regarding possible stalking horse bid	0.20	90.00	CMG
Jan-12-22	B130	A104	Review numerous memos to/from client re golf cart sale	1.00	450.00	CMG
	B130	A104	Review memos to/from Mr. Gerrard; review marked up debtor retention version of nondisclosure agreement and comment on it	0.30	135.00	CMG
	B130	A104	Review memos to/from Eric Johnson, Mr. Gerrard regarding appraisals and access to property	0.20	90.00	CMG
	B130	A104	Review memos to/from Mr. Patterson regarding timing of sale/delivery of golf carts once court has ruled on motion	0.20	90.00	CMG
	B310	A104	Review and study Proof of Claim submitted by Caterpillar Financial for assets to be sold	0.40	180.00	CMG
Jan-13-22	B130	A104	Review information re golf carts and electric truck, purchase/sale information	0.75	337.50	CMG
	B130	A103	Dictation of sale motion re equipment and review exhibits	1.20	540.00	CMG
	B130	A103	Assist CMG drafting Motion to Sell Golf Carts, Truck	0.60	120.00	KLC
Jan-14-22	B130	A106	Telephone conference with Mr. Gerrard re StoneX analysis, bid procedures motion, equipment sale and related matters	0.40	180.00	CMG
	B130	A104	Review and revision of equipment sale motion	0.40	180.00	CMG
	B130	A103	Dictation of motion to expedite hearing re equipment sale motion; Dictation of order re same; Review and revision of motion/order	0.55	247.50	CMG
	B130	A104	Review and revision of bid procedures motion	1.40	630.00	CMG

	B130	A103	Dictation of motion and order to expedite hearing re bid procedures motion	0.55	247.50	CMG
	B130	A103	Assist CMG drafting and revising Bid Procedures Motion	0.75	150.00	KLC
	B130	A103	Assist CMG revising Motion to Sell Golf Carts, Truck	0.30	60.00	KLC
	B130	A103	Assist CMG drafting Motion to Expedite Hearing re Motion to Sell Golf Carts, Truck and Order re same	0.15	30.00	KLC
	B130	A103	Assist CMG drafting Motion to Expedite Hearing re Bid Procedures Motion and Order re same	0.10	20.00	KLC
Jan-18-22	B130	A104	Review memos to/from Frank Childress re interested going concern purchaser	0.20	90.00	CMG
	B130	A104	Review memos to/from Marc Patterson re date for bid procedures hearing	0.10	45.00	CMG
	B130	A104	Review memos to/from Dennis Gerrard, Marc Patterson regarding tolling agreement with The Andersons, Inc. and potential terms	0.20	90.00	CMG
Jan-19-22	B130	A103	Assist CMG revising Orders on Motion to Expedite Hearings on Bid Procedures Motion and Motion to Sell Golf Carts, Truck	0.10	20.00	KLC
	B130	A104	Receipt and review of Order on Motion to Expedite Hearing on Motion to Sell Golf Carts, Truck; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	30.00	KLC
	B130	A104	Receipt and review of Order on Motion to Expedite Hearing on Bid Procedures Motion; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	30.00	KLC
Jan-20-22	B130	A103	Dictation of COS re sale and bid procedures	0.30	135.00	CMG

	B130	A104	Review UST objection to sales	0.25	112.50	CMG
	B130	A103	Further dictation of COS re bid procedures motion	0.15	67.50	CMG
	B130	A103	Assist CMG drafting Certificate of Service re Motion to Sell Golf Carts, Truck	0.10	20.00	KLC
	B130	A103	Assist CMG drafting Certificate of Service re Bid Procedures Motion	0.10	20.00	KLC
	B130	A110	Organize and supervise mailout of Motion to Sell Golf Carts, Truck and Bid Procedures Motion	0.30	60.00	KLC
Jan-21-22	B130	A104	Review Bank of Commerce objection to bid procedures	0.55	247.50	CMG
	B130	A104	Review joinders to Trustee sale objection	0.30	135.00	CMG
	B190	A104	Review memos to/from Todd Bearup regarding additional information to creditors for the past year of transactions; information on golf cart source of payment and numerous related issues	0.25	112.50	CMG
	B130	A103	Assist CMG drafting Agreed Order on Motion to Sell Golf Carts, Truck	0.50	100.00	KLC
Jan-24-22	B130	A104	Review numerous memos to/from Mr. Noble re negotiations on sale/bid procedures	0.35	157.50	CMG
	B130	A108	Telephone conference with Marc Patterson re golf cart motion	0.30	135.00	CMG
	B130	A101	Review file on golf cart motion; Review all objections and joinders to sale motion and hearing preparation	1.15	517.50	CMG
	B130	A104	Review memos to/from Mr. Gerrard confirming no objection to NDA record retention language	0.15	67.50	CMG
	B130	A104	Review UMB Bank objection to bid procedures	0.75	337.50	CMG

	B130	A104	Review memos to/from Doug Noble re waiver of non-compliance	0.20	90.00	CMG
	B190	A104	Review joinder of Farm Group and Farm Groups I, II, III to Bank of Commerce objections	0.10	45.00	CMG
	B130	A110	Review file and court docket re: 1/25/22 hearing on Bid Procedures Motion; prepare hearing folder for same	0.75	150.00	KLC
	B130	A110	Review file and court docket re: 1/25/22 hearing on Motion to Sell Golf Carts, Truck; prepare hearing folder for same	0.45	90.00	KLC
Jan-25-22	B130	A101	Review file; Review motion to establish bid procedures; Review objections on motion re bid procedures; Review joinders; Prepare for hearing	1.35	607.50	CMG
	B130	A108	Telephone conference with Jimmy Horne re golf cart motion and witness preparation	0.40	180.00	CMG
	B130	A109	Attended golf cart sale motion, bid procedures motion hearings	3.00	1,350.00	CMG
	B130	A104	Review minute entry on sale of golf carts	0.10	45.00	CMG
	B130	A104	Review witness exhibit list for sale of golf carts	0.10	45.00	CMG
	B130	A104	Review memos to/from Jimmy Horne regarding waiting for order to be entered before delivery of golf carts	0.20	90.00	CMG
Jan-26-22	B130	A104	Receipt and review of minute entry re Motion to Sell Golf Carts, Truck; calendar deadline to submit order	0.10	20.00	KLC
Jan-27-22	B110	A108	Telephone conference with DEQ and client regarding wind down issues	0.55	247.50	CMG
	B130	A104	Review memos to/from Jimmy Horne, Marc Patterson regarding timing of sale of golf carts	0.25	112.50	CMG
	B130	A104	Brief review of environmental compliance reports	0.25	112.50	CMG

Jan-28-22	B130	A103	Assist CMG revising Agreed Order on Motion to Sell Golf Carts, Truck	0.20	40.00	KLC
	B130	A103	Assist CMG drafting letter re draft Agreed Order on Motion to Sell Golf Carts, Truck	0.10	20.00	KLC
Jan-29-22	B110	A104	Review memos to/from Vine regarding site visit with MDEQ	0.10	45.00	CMG
Jan-30-22	B130	A104	Review memos to/from Doug Noble re notice of bid procedures changes	0.25	112.50	CMG
Jan-31-22	B130	A104	Review numerous memos to/from Kristi Johnson, Eric Johnson, Greg Hesse, Eileen Shaffer, review and revision of order on sale of golf carts	1.00	450.00	CMG
	B130	A103	Assist CMG revising Agreed Order on Motion to Sell Golf Carts, Truck	0.20	40.00	KLC
Feb-01-22	B130	A104	Review memos to/from Heather Williams re timing of distribution of sale materials	0.25	112.50	CMG
Feb-02-22	B110	A108	Telephone conference with MDEQ regarding environmental compliance in close down and report as part of modification process	0.75	337.50	CMG
	B130	A104	Review agreed order authorizing sale of golf carts	0.20	90.00	CMG
	B130	A104	Review memos to/from Jimmy Horne advising Mr. Horne to consummate sale process	0.25	112.50	CMG
	B130	A103	Dictation of memo to Jimmy Horne authorizing release of golf carts and collection of funds	0.20	90.00	CMG
	B130	A103	Assist CMG drafting APA	1.10	220.00	KLC
Feb-03-22	B130	A104	Review memos to/from Dennis Gerrard, review Tyson draft NDA and comment on same	0.85	382.50	CMG
	B130	A104	Review numerous memos to/from Jimmy Horne regarding sale of golf carts,	0.30	135.00	CMG

			disbursement of proceeds and sale of electric truck			
	B130	A104	Review memos to/from Mr. Gerrard updating tours of facility and updates as to personnel	0.20	90.00	CMG
	B130	A103	Assist CMG revising APA	0.50	100.00	KLC
Feb-04-22	B110	A104	Review notices from MDEQ for Ted Lampton and Roy Furrh	0.20	90.00	CMG
Feb-05-22	B130	A104	Review memos to/from Mr. Gerrard regarding Tyson NDA	0.35	157.50	CMG
	B130	A104	Review memos to/from Kayla Britton requesting NDA for proposed sale and access to data room	0.25	112.50	CMG
Feb-08-22	B130	A103	Assist CMG revising sample APA	1.50	300.00	KLC
Feb-10-22	B130	A103	Dictation of asset purchase agreement	3.50	1,575.00	CMG
	B130	A104	Review memos to/from James Baring regarding golf cart and related payments	0.20	90.00	CMG
Feb-11-22	B130	A104	Review memos to/from James Baring regarding distribution of check for golf cart sales	0.15	67.50	CMG
Feb-13-22	B130	A103	Dictation of Sale Motion	3.00	1,350.00	CMG
Feb-14-22	B130	A104	Review and revision of asset purchase agreement	1.20	540.00	CMG
	B130	A103	Assist CMG drafting Report of Sale for golf carts, electric truck	0.20	40.00	KLC
Feb-15-22	B130	A104	Review memos to/from Regions re golf cart account	0.20	90.00	CMG
	B130	A103	Work on schedules to asset purchase agreement and conform APA to transaction	1.00	450.00	CMG
	B130	A104	Review and revision of Sale Motion	1.50	675.00	CMG

Feb-16-22	B110	A104	Review memos to/from Marc Patterson to MDEQ regarding outline of visits, wind down plan and related matters	0.25	112.50	CMG
	B130	A104	Review order approving bid procedures	0.45	202.50	CMG
	B130	A107	Telephone conference with Charles Swayze regarding property descriptions for asset sale	0.20	90.00	CMG
	B130	A104	Review property descriptions and surveys	0.50	225.00	CMG
	B130	A104	Review memos to/from Doug Noble regarding issues concerning confirming APA/sale motion to agreement	0.20	90.00	CMG
	B130	A108	Telephone Conference with client, Eric Johnson regarding credit bidding and timing of sale of assets	0.45	202.50	CMG
	B130	A104	Final review and revision of Sale Motion	0.75	337.50	CMG
	B130	A104	Review and revision of schedules, APA and coordinate final sale product	0.50	225.00	CMG
	B130	A104	Review memos to/from Heather Williams regarding additional supplements to mail out and evidence of same with the court	0.10	45.00	CMG
	B130	A104	Review memos to/from Heather Williams regarding working through the matrix, notice provisions, lack of need for separate notice and numerous related issues regarding bundling documents and noticing	0.20	90.00	CMG
	B130	A104	Review memos to/from Charlie Swayze, careful review of descriptions of real estate and related questions for him	0.45	202.50	CMG
	B130	A104	Review memos to/from Mr. Gerrard regarding date of sale	0.20	90.00	CMG
	B130	A104	Review memos to/from Mr. Gerrard confirming the notice to interested parties of up-to-date information on bid procedures, auction, bid deadlines and hearing to approve auction results	0.20	90.00	CMG

	B130	A104	Review memo to Heather Williams re APA draft and comments	0.10	45.00	CMG
	B130	A104	Review memos to/from Doug Noble re form APA, Qualified Bid issues	0.25	112.50	CMG
	B130	A104	Review and revision of APA; Dictation of memo to Mr. Gerrard re same	1.00	450.00	CMG
	B130	A104	Review memo from Frank Brumfield re auction	0.20	90.00	CMG
	B130	A103	Assist CMG drafting and revising Motion to Sell Substantially All of the Assets	2.10	420.00	KLC
	B130	A103	Assist CMG revising sample APA and Schedules	2.00	400.00	KLC
Feb-17-22	B130	A104	Review memo from Alan Boyko re sale hearing issues and professionals involvement	0.20	90.00	CMG
	B130	A104	Review memos to/from Roy Furrh regarding discussion with MDEQ of wind down budget	0.10	45.00	CMG
	B130	A104	Review memos to/from Ed Lawler re status/expectations of sale	0.15	67.50	CMG
	B130	A104	Review order for COS	0.15	67.50	CMG
	B130	A104	Review notice of cancelled hearing	0.10	45.00	CMG
	B130	A103	Dictation of motion to reduce notice, objection deadline re 363 motion; Dictation of order; Review and revision of same	0.55	247.50	CMG
	B130	A104	Review sale order	0.20	90.00	CMG
	B130	A104	Receipt and review of Order Granting Motion to Shorten Deadlines re Motion to Sell Substantially All of the Assets; calendar various deadlines, auction date and hearing date to trigger preparation of hearing folder	0.20	40.00	KLC

	B130	A104	Receipt and review of Order Approving Bid Procedures; calendar deadline to return Good Faith Deposit to unsuccessful bidders	0.10	20.00	KLC
	B130	A103	Assist CMG drafting Motion to Shorten Deadlines re Motion to Sell and Order re same	0.35	70.00	KLC
Feb-18-22	B130	A104	Review memo from Jon Hawkins (Thompson Hine representing potential purchaser) re agenda items for asset sale	0.55	247.50	CMG
	B130	A104	Review memos to/from prospective purchaser re environmental questionnaire	0.25	112.50	CMG
	B130	A108	Conference call with FTI Consulting, Thompson Hine, CR3 re bid procedures, APA concerns and related issues	1.15	517.50	CMG
	B130	A107	Telephone conference with Eric Johnson re credit bidding issues; Work on terms of credit bidding proposals	0.65	292.50	CMG
	B130	A104	Review memo from Louis Dreyfus, Robert Waxlax expressing interest in bidding	0.25	112.50	CMG
	B130	A104	Review memos to/from Louis Dreyfus re NDA and data room access	0.20	90.00	CMG
	B130	A104	Review memos to/from Mr. Gerrard re access to property and limiting access	0.25	112.50	CMG
	B130	A104	Review numerous memos to/from client, Eric Johnson re fence issues and security matters	0.25	112.50	CMG
	B130	A104	Review numerous memos to/from Robert Waxlax (Louis Dreyfus) re NDA markup	0.25	112.50	CMG
	B130	A104	Review memo from Eric Johnson re diligence requests	0.15	67.50	CMG
	B130	A104	Review memo from Heather Williams certifying sale motion notices	0.25	112.50	CMG
	B130	A104	Review numerous additional memos to/from client, Eric Johnson regarding	0.45	202.50	CMG

			possible theft exposure after plant shuts down and fencing needs			
	B130	A104	Review memo from Jon Hawkins re agenda for call	0.15	67.50	CMG
Feb-19-22	B130	A104	Review numerous additional memos to/from Mr. Gerrard, Robert Waxlax (Louis Dreyfus) re NDA; Review NDA markup and response	0.55	247.50	CMG
	B130	A104	Review memos to/from Derek Henderson, Mr. Gerrard re interest of Ware Milling in purchasing assets, how to get information to Ware Milling	0.35	157.50	CMG
	B130	A104	Review memos to/from Robert Waxlax re access to data room and seeking qualified bidder status and seeking data room access for a number of his team members	0.25	112.50	CMG
	B130	A104	Review memo from Mr. Gerrard/Robert Waxlax re qualified bidder status for Louis Dreyfus	0.25	112.50	CMG
	B130	A104	Review memo from Mr. Gerrard re confirming discussion with R. Ware re asset sale document	0.20	90.00	CMG
	B130	A104	Review memos to/from Robert Waxlax re availability of employees upon sale	0.25	112.50	CMG
	B130	A104	Review memo from James Baring re employee list and suggestions as to rehiring process upon sale	0.45	202.50	CMG
	B130	A104	Review numerous memos to/from Jon Hawkins, Eric Johnson re supplying diligence materials	0.45	202.50	CMG
Feb-20-22	B130	A107	Telephone conference with Eric Johnson re credit bid issues	0.25	112.50	CMG
	B130	A104	Review credit bid pleadings and approve	0.45	202.50	CMG
	B130	A104	Review memos to/from Jon Hawkins re sale inquiries, permits, affiliates as sellers,	0.55	247.50	CMG

			new market tax credits, NDA turnover, testimony at sale hearing, sale order			
	B130	A104	Review memos to/from Charlie Swayze re title work and status	0.30	135.00	CMG
	B130	A104	Review numerous memos to/from Marc Patterson, Robert Waxlax re sale, inspections, due diligence, volume sales, employee availability, truck scales, crush volume, title issues, Dennis Gerrard response	1.00	450.00	CMG
	B130	A104	Review memos to/from Jon Hawkins, Eric Johnson re use of UMB materials	0.20	90.00	CMG
	B130	A104	Review memo from Jon Hawkins with numerous due diligence items to respond to/resolve	0.35	157.50	CMG
	B130	A104	Review memos to/from Lucas Schneider re sale issues, executory contracts, title issues, escrow agreement and related questions	0.20	90.00	CMG
	B130	A104	Review memos to/from Sterling Kidd re Qualified Bidder	0.25	112.50	CMG
	B130	A104	Review memos to/from Eric Johnson re supplemental bid procedures pleadings/order	0.50	225.00	CMG
	B310	A104	Review numerous memos to/from R Waxlax re due diligence questions	0.45	202.50	CMG
Feb-21-22	B110	A104	Review Thoroughbred notice	0.10	45.00	CMG
	B130	A104	Review memos to/from CRO; Review Thackett NDA	0.10	45.00	CMG
	B130	A104	Review memos to/from Eileen Shaffer re bid/sale updates	0.20	90.00	CMG
	B130	A104	Review numerous memos to/from Kristi Johnson, Eric Johnson re credit bidding issues	0.35	157.50	CMG

B130	A104	Review memos to/from Mr. Gerrard re NDA markup	0.10	45.00	CMG
B130	A104	Review memos to/from CR3, various interested parties to coordinate site visits	0.45	202.50	CMG
B130	A104	Review numerous memos to/from Mr. Kerschner (Thoroughbred) re due diligence, title updates, notice issues	0.75	337.50	CMG
B130	A104	Review numerous, extensive memos to/from Lucas Schneider (The Andersons, Inc.) re due diligence, title work, secured claims, escrow agreement, executory contracts and related matters	0.75	337.50	CMG
B130	A103	Work on motion/order supplementing bid procedures; Review memo from Eric Johnson re same	0.40	180.00	CMG
B130	A103	Dictation of COS; Review and revision of same and exhibits re sale motion	0.25	112.50	CMG
B130	A104	Review memos to/from Lucas Schneider re UCC filings and notices	0.25	112.50	CMG
B130	A104	Review memos to/from CRO, Kayla Britton re NDA and ADM interest in sale	0.65	292.50	CMG
B130	A103	Work on sale order	2.55	1,147.50	CMG
B130	A103	Assist CMG drafting Certificate of Service re Motion to Sell Substantially All of the Assets	0.15	30.00	KLC
B110	A104	Review notice from the Andersons	0.20	90.00	CMG
B130	A107	Telephone conference with Charlie Tindall; Review memos from Charlie Tindall re Farmers Grain Terminal and Qualifying Bid status	0.30	135.00	CMG
B130	A104	Review memos to/from Eric Johnson; Review disclosure and consent for the sharing of information	0.35	157.50	CMG
B130	A107	Telephone conference with Eric Johnson	0.25	112.50	CMG

		re bid procedures, credit bidding, virtual bidding/auction			
B130	A106	Telephone conference with Dennis Gerrard re hearings, sale/bid issues, continuing 557 issues	0.35	157.50	CMG
B130	A104	Review order on expedited motion	0.10	45.00	CMG
B130	A104	Review memo from Jon Hawkins re transfers of property between affiliates, procedure post-closing, credit bidding	0.45	202.50	CMG
B130	A103	Work on and finalize escrow agreement, transition services agreement and dictation of memo to Mr. Gerrard re same	1.55	697.50	CMG
B130	A104	Review memos to/from Mr. Gerrard, Eric Johnson re virtual auction, credit bidding memos and pleadings	0.75	337.50	CMG
B130	A104	Review Bank of the West objection to sale	0.25	112.50	CMG
B130	A103	Dictation of memo to bidders re withdrawal of A/R and responses	0.25	112.50	CMG
B130	A104	Review Kristi Johnson objection to supplement	0.25	112.50	CMG
B130	A110	Review file and court docket re: 2/23/22 hearing on Farm Groups' and MDAC's Objection to Motion to Sell; prepare hearing folder for same	0.35	70.00	KLC
B130	A110	Review file and court docket re: 2/23/22 hearing on Joint Motion to Supplement Bid Procedures Order; prepare hearing folder for same	0.20	40.00	KLC
B130	A103	Assist CMG drafting and revising Escrow Agreement	1.80	360.00	KLC
B130	A103	Assist CMG drafting and revising Transition Services Agreement	0.30	60.00	KLC
B130	A103	Assist CMG drafting and revising Order on Motion to Sell Substantially All of the Assets	2.10	420.00	KLC

Feb-23-22	B130	A104	Review draft orders/proposals from Eric Johnson, Kristi Johnson re credit bidding issue resolution	0.35	157.50	CMG
	B130	A104	Review numerous minute entries and witness/exhibit lists from 2/23 hearings	0.25	112.50	CMG
	B130	A104	Review memo from Charles Swayze, review documents and diligence materials concerning ERGON sale/purchase that has not been completed and efforts to resolve the ERGON transaction	0.75	337.50	CMG
	B130	A104	Review memos to/from Chad Hammons re confirming status of Bank of the West; Review cleanup for its credit bid	0.25	112.50	CMG
	B130	A104	Review memos to/from Jon Hawkins re sale motion proof	0.25	112.50	CMG
	B130	A104	Review memos to/from Tim Anzenberger re sale issues	0.20	90.00	CMG
	B130	A104	Review memos to/from Andy Phillips re modifying reps and warranties, agreed order	0.55	247.50	CMG
	B130	A104	Review GB&T sale motion objection	0.40	180.00	CMG
	B130	A103	Finalize sale order	1.20	540.00	CMG
	B130	A104	Review Gresham objection	0.30	135.00	CMG
	B130	A104	Review memo from Charlie Swayze re title insurance wait period	0.20	90.00	CMG
	B130	A104	Review further memo from Tim Anzenberger re items for sale and related issues	0.25	112.50	CMG
	B130	A104	Review memo from Lucas Schneider re disclosures of bids and related material	0.25	112.50	CMG
	B130	A104	Review order on auction procedures and supplements	0.25	112.50	CMG
	B130	A104	Review CompuWeigh response	0.35	157.50	CMG

	B130	A104	Review Brumfield proof of ability to close	0.20	90.00	CMG
	B130	A104	Review memos to/from Jon Hawkins re witness and exhibit list	0.25	112.50	CMG
	B130	A103	Dictation of exhibit, witness list; Review and revision of same	0.30	135.00	CMG
	B130	A103	Assist CMG revising Order on Motion to Sell Substantially All of the Assets	0.40	80.00	KLC
Feb-24-22	B110	A104	Review notice from Farmers Grain	0.10	45.00	CMG
	B130	A108	Numerous telephone conferences with FBI, US Attorneys, client re office raid, efforts to resolve computer shut down and preserve ongoing business preservation, reopening computers and office, exclusion of personnel from computer access, future returns to business office and numerous related issues to maintain viability	2.40	1,080.00	CMG
	B130	A104	Review CFSC proof of claim in support of bid	0.25	112.50	CMG
	B130	A104	Review memos to/from Eric Johnson, Kristi Johnson, Chad Hammons re credit bid order	0.75	337.50	CMG
	B130	A107	Telephone conference with Eric Johnson re credit bid order	0.25	112.50	CMG
	B130	A104	Review memo from Jennifer Moffett; Review executed escrow agreement	0.20	90.00	CMG
	B130	A104	Review search warrant	0.25	112.50	CMG
	B130	A104	Review minute entries	0.35	157.50	CMG
	B130	A104	Review memos to/from Chad Hammons re personal property taxes	0.25	112.50	CMG
	B130	A104	Review memos to/from Alan Boyko re permit issues for sale interest	0.20	90.00	CMG
	B130	A104	Review memos to/from Tim Anzenberger re bid issues	0.20	90.00	CMG

B130	A104	Review memo from Eric Johnson and review credit bid procedures order	0.25	112.50	CMG
B130	A104	Review memos to/from Andy Phillips; Review draft order re APA revision	0.25	112.50	CMG
B130	A104	Review bids and APAs	3.15	1,417.50	CMG
B130	A104	Review numerous memos to/from Doug Noble re bid deadlines, APA execution and related issues	0.45	202.50	CMG
B130	A104	Review memo from Charlie Tindall re Sidon deposit	0.20	90.00	CMG
B130	A104	Review further memo from Mr. Johnson and review credit bid order	0.45	202.50	CMG
B130	A104	Review numerous memos to/from Sam Wright, Clay Dabbs regarding FBI raid, reopening for business and obtaining/retaining documents; computer lock out	1.00	450.00	CMG
B130	A104	Review memos to/from Chad Hammons re additions to supplemental bid procedures order	0.35	157.50	CMG
B130	A104	Review minute entry re hearings re sale issues	0.20	90.00	CMG
B130	A104	Review Macquarie objection to sale	0.40	180.00	CMG
B130	A104	Review memos to/from Thoroughbred reps re escrow agreement and deposits	0.35	157.50	CMG
B130	A104	Review The Andersons, Inc. witness and exhibit list	0.20	90.00	CMG
B130	A104	Review memos to/from Eric Johnson re bid summaries	0.25	112.50	CMG
B130	A104	Review memos to/from Sterling Kidd re lease/sale issues and credit bids	0.45	202.50	CMG
B130	A104	Review UMB sale objection	0.30	135.00	CMG

	B130	A104	Review numerous witness/exhibit lists	0.40	180.00	CMG
	B130	A104	Continuing review of bids/APAs and related materials	1.75	787.50	CMG
	B130	A104	Review UMB bid	0.85	382.50	CMG
	B130	A104	Numerous additional telephone conferences with FBI, AUSA, client negotiating release of computers, business assets to stay in business and to sell assets at hearing	1.55	697.50	CMG
	B130	A104	Review bid summary and exhibits	0.55	247.50	CMG
	B195	A111	Travel to Aberdeen	1.50	675.00	CMG
	B130	A103	Assist CMG drafting letter re exhibits for 2/25 hearing	0.20	40.00	KLC
	B130	A103	Assist CMG preparing summary of bids received	1.15	230.00	KLC
	B130	A110	Assist CMG preparing exhibits for 2/25 hearing/auction	0.75	150.00	KLC
	B195	A111	Travel to Aberdeen	1.50	300.00	KLC
Feb-25-22	B130	A104	Review memos to/from Tyler Mass re additional auction services	0.20	90.00	CMG
	B130	A109	Attended hearings	1.00	450.00	CMG
	B130	A109	Conference with CRO; Prepare for sale hearing	1.60	720.00	CMG
	B130	A109	Attended auction/sale hearing	7.50	3,375.00	CMG
	B130	A104	Review numerous memos from John Henson, Lance Mohamed re correct purchaser of wheel loader	0.25	112.50	CMG
	B130	A104	Review memo from Eric Johnson re credit bid treatment; Review proposed credit bid treatment	0.25	112.50	CMG

	B130	A108	Numerous telephone conferences with Dennis Gerrard, Eric Johnson re bids, procedures and auction facets	0.75	337.50	CMG
	B130	A104	Review UMB bid and exhibits	1.65	742.50	CMG
	B195	A111	Travel to Jackson	1.50	675.00	CMG
	B130	A103	Assist CMG revising Order on Motion to Sell Substantially All of the Assets	0.50	100.00	KLC
	B130	A109	Attended auction for substantially all of the assets and hearing on Motion to Sell Substantially All of the Assets	7.50	1,500.00	KLC
	B195	A111	Travel to Jackson	1.50	300.00	KLC
Feb-26-22	B130	A104	Review minute entry re sale order	0.20	90.00	CMG
	B130	A104	Review exhibit/witness list	0.20	90.00	CMG
Feb-27-22	B130	A104	Review memos to/from Eric Johnson; Review credit bid language and personal property taxes	0.25	112.50	CMG
	B130	A103	Dictation of memo to Charles Kelley re sale/bids	0.20	90.00	CMG
	B130	A104	Review memos to/from Alan Boyko re timing of sale hearing and order entry	0.20	90.00	CMG
	B130	A104	Review memos to/from Mr. Gerrard, Alan Boyko re timing for sale order entry and closing	0.20	90.00	CMG
Feb-28-22	B130	A104	Review memos to/from Les Alvis re CompuWeigh Corp. language in sale order	0.20	90.00	CMG
	B130	A104	Review memos to/from T. Mass re sale/auction results/remnants	0.20	90.00	CMG
	B130	A104	Review memos to/from CRO, Thoroughbred re opening bids - again	0.20	90.00	CMG
	B130	A104	Review various sale order iterations to/from Eric Johnson, tax issues and timing	0.65	292.50	CMG

	B130	A107	Telephone conference with Eric Johnson re sale order, new sale opportunities	0.20	90.00	CMG
	B130	A107	Telephone conference with Eric Johnson re further sale/assignment issues	0.20	90.00	CMG
	B130	A104	Review draft sale/resale offer and emails in support	0.25	112.50	CMG
	B130	A107	Telephone conference with Roy Furrh re inspections and compliance filings for closing	0.25	112.50	CMG
	B130	A104	Receipt and review of minute entry re Motion to Sell Substantially All of the Assets; calendar deadline to submit proposed order	0.10	20.00	KLC
Mar-01-22	B130	A104	Review memos from M. Stovers re UMB assets and disposition of them	0.20	90.00	CMG
	B130	A104	Review memo from Eric Johnson re status conference for sale issues and transition	0.10	45.00	CMG
	B130	A104	Review memos to/from Roy Furrh, Marc Patterson re MDEQ issues, site visit, wind down plan re asset sale	0.25	112.50	CMG
Mar-02-22	B130	A107	Telephone conference with Eric Johnson re wind up/sale and transition issues	0.20	90.00	CMG
	B130	A104	Review file re deposits; Dictation of letter to bidders re cash deposit returns	0.35	157.50	CMG
	B130	A104	Review numerous memos re finalizing sale terms	0.25	112.50	CMG
	B130	A108	Conference call with CR3, UMB re transition of assets and closing	0.45	202.50	CMG
Mar-03-22	B130	A104	Review wire transfer funds to bidders, requests for wire transfer information	0.35	157.50	CMG
	B130	A103	Work on sale order	0.35	157.50	CMG
	B130	A104	Review memos to/from Dennis Gerrard. Wayne Lewis regarding wind down	0.15	67.50	CMG

			activities including insurance, utilities and related matters			
	B130	A103	Assist CMG drafting Agreed Order re sale of articulated boom lift to Bank of the West	0.30	60.00	KLC
	B130	A103	Assist CMG drafting Agreed Order re sale of telehandler to Cat Financial	0.30	60.00	KLC
	B130	A103	Assist CMG drafting Order re sale of small wheel loader to Roebuck Landing	0.30	60.00	KLC
Mar-04-22	B130	A104	Review memos to/from Tim Anzenberger re sale/auction bids	0.20	90.00	CMG
	B130	A107	Telephone conference with Eric Johnson re sale issues; Dictation of sale order and implementation of sale	0.20	90.00	CMG
	B130	A104	Review memos to/from Roy Furrh regarding observations of initial pass through on wind down plan with MDEQ and related matters	0.25	112.50	CMG
Mar-05-22	B130	A104	Review memos to/from client, Eric Johnson re unencumbered assets	0.20	90.00	CMG
Mar-07-22	B130	A106	Telephone conference with Dennis Gerrard re sale/transition issues	0.15	67.50	CMG
	B130	A103	Work on sale order	1.00	450.00	CMG
	B130	A104	Review memos to/from Lance Mohammed, D. Grossman re deposit return	0.20	90.00	CMG
	B130	A107	Telephone conference with Les Alvis re scales control	0.25	112.50	CMG
	B130	A104	Review memos to/from UMB/Debtor/Marc Patterson re transition team	0.25	112.50	CMG
	B130	A104	Review memos to/from Eric Johnson re redlined sale order; Review revisions	0.35	157.50	CMG

	B130	A104	Review memos to/from Lance Mohammed re escrow issues	0.25	112.50	CMG
	B130	A104	Review memos to/from Marc Patterson regarding updates on MDEQ issues	0.20	90.00	CMG
Mar-08-22	B130	A104	Review memos to/from Sterling Kidd, Marc Patterson re return/pickup of Caterpillar equipment	0.25	112.50	CMG
	B130	A104	Review memos to/from Cookie Thomas re return of deposits and Tiger claim of loan	0.25	112.50	CMG
	B130	A104	Review memos to/from CR3 re possession of CFSC leased equipment	0.20	90.00	CMG
	B130	A104	Review memos to/from Dennis Gerrard re packaging GrainSoft software for transfer	0.25	112.50	CMG
	B310	A104	Review memos to/from Mr. Gerrard re Kayla Britton (ADM) request for data room interest/NDA; Review Eric Johnson response	0.25	112.50	CMG
	B110	A103	Assist CMG drafting New Client Data Sheet	0.10	20.00	KLC
Mar-09-22	B130	A104	Review memo from Eric Johnson; Review draft Transition Services Agreement	0.85	382.50	CMG
	B130	A104	Review memos to/from Dennis Gerrard, Eric Johnson re CR3 personnel needed under TSA	0.20	90.00	CMG
Mar-10-22	B130	A104	Review updated TSA	0.30	135.00	CMG
	B130	A104	Review numerous memos to/from Bobby Warrington re utility termination, meter disconnects, timing of ownership transfer, contract rejection and additional matters; Review utility file	0.75	337.50	CMG
	B130	A104	Review additional memos to/from John Stewart re asset sale of equipment included in UMB credit bid	0.25	112.50	CMG
	B130	A104	Review memo from Eric Johnson and review most recent version of TSA	0.65	292.50	CMG

Mar-11-22	B130	A104	Review memos to/from Eric Johnson re finalizing TSA, approval of TSA	0.35	157.50	CMG
	B130	A104	Review memo from Eric Johnson; Telephone conference with Dennis Gerrard; Review latest draft of TSA and need to fill in Exhibit A	0.45	202.50	CMG
	B130	A103	Work on sale order	0.75	337.50	CMG
	B210	A104	Review memos to/from Bobby Warrington re utility service transition; Dictation of memo to Eric Johnson re same	0.25	112.50	CMG
	B130	A103	Assist CMG revising Order on Motion to Sell Substantially All of the Assets	2.90	580.00	KLC
Mar-12-22	B130	A104	Review memo from Dennis Gerrard re TSA assumptions and calculations	0.40	180.00	CMG
	B130	A104	Review memos to/from Eric Johnson, Dennis Gerrard re form and content of TSA, accurate divisions of labor and cost reimbursement; Review TSA revisions	0.65	292.50	CMG
Mar-14-22	B130	A104	Review final draft of UMB sale order; Review memos to/from Eric Johnson re same	0.20	90.00	CMG
	B130	A104	Review memos to/from CR3, Eric Johnson re TSA and related compensation issues	0.20	90.00	CMG
	B130	A104	Review memo from Dennis Gerrard and review funding needs from UMB in transition	0.55	247.50	CMG
	B130	A104	Review memo from Cookie Thomas, Heartland re deposit from sale	0.20	90.00	CMG
	B130	A104	Review memos to/from Bobby Warrington re utility transfer at transition	0.25	112.50	CMG
	B130	A104	Review bill of sale issues and memo to Dennis Gerrard re same	0.25	112.50	CMG
	B130	A104	Review memo from James Baring re utility provider issues	0.55	247.50	CMG

	B130	A104	Review memos to/from Roy Furrh re MDEQ issues to be addressed before sale closes; Review file; Dictation of memo to client re action plan to wrap up environmental closure plan	0.65	292.50	CMG
	B130	A104	Review memos to/from Charlie Swayze, client group re software licenses	0.20	90.00	CMG
	B130	A104	Review memos to/from Eric Johnson; Review redlined sale order	0.35	157.50	CMG
Mar-16-22	B130	A104	Review memos to/from James Baring re licenses/ownership issues in software	0.25	112.50	CMG
	B130	A104	Review memos to/from client; Review utility provider list and transfer/termination of providers	0.35	157.50	CMG
	B130	A104	Review memos to/from Heather Williams, KLC re sale administrative expenses	0.30	135.00	CMG
	B130	A104	Review memos to/from R. Effling re sale/transition notes and contacts	0.10	45.00	CMG
	B130	A104	Review memos to/from James Baring re GrainSoft license/owned and status as UMB collateral	0.20	90.00	CMG
Mar-17-22	B130	A104	Review memos to/from client, Pearman Casanova, Eric Johnson re status of GrainSoft software and collateralization of it by UMB	0.40	180.00	CMG
Mar-18-22	B130	A104	Review memos to/from Charlie Tindall re Farmers Grain deposit	0.15	67.50	CMG
	B130	A104	Review memos to/from Eric Johnson re TSA status, closing issues	0.10	45.00	CMG
	B130	A103	Work on bills of sale; Review memos to/from Dennis Gerrard re same	0.25	112.50	CMG
	B130	A104	Review memos to/from Pete Mirakian re TSA, finalizing sale order, closing date	0.20	90.00	CMG
Mar-19-22	B130	A107	Telephone conference with Charlie	0.25	112.50	CMG

			Swayze re closing of sale, title insurance premium and alteration			
	B130	A104	Review memos to/from all counsel, Charlie Swayze re closing of sale issues	0.10	45.00	CMG
Mar-21-22	B130	A104	Review memos to/from Cookie Thomas, Charlie Tindall re wrap up of Farmers Grain Terminal issues on sale	0.20	90.00	CMG
	B130	A104	Review memos to/from Marc Patterson re staffing/labor divisions between EGT and UMB	0.25	112.50	CMG
	B130	A104	Review numerous memos to/from Rob Effling/client re completion of sales/shipping of inventory	0.25	112.50	CMG
	B130	A103	Dictation of memo to Charlie Swayze re land allocation	0.20	90.00	CMG
Mar-22-22	B130	A104	Review memos to/from Eric Johnson re time to finalize sale order and TSA	0.15	67.50	CMG
	B130	A104	Review further memos to/from Eric Johnson re TSA and sale order issues	0.15	67.50	CMG
	B130	A104	Review memos to/from Dennis Gerrard re adding insurance costs to expense list	0.20	90.00	CMG
	B130	A104	Review memo from Eric Johnson re updated estimate of costs to operate/secure assets	0.10	45.00	CMG
	B130	A107	Conference call with UMB counsel, Charlie Swayze re sale/closing issues, reservation of jurisdiction and surcharges in sale order and in TSA motion, sale allocation, treatment/discussion of surcharge in TSA motion	0.50	225.00	CMG
	B130	A104	Review memos to/from Dennis Gerrard re updated budget with allocations to UMB/Debtor	0.20	90.00	CMG
	B130	A104	Review memos to/from Dennis Gerrard, Rob Effling re start date of UMB expense	0.30	135.00	CMG

			sharing, coverage period, utility time frame			
	B130	A104	Review revised sale order, TSA, motion to approve TSA; Review memos to/from Eric Johnson re changes/revisions to order and TSA motion	1.00	450.00	CMG
	B130	A104	Review memo from Eric Johnson outlining release procedures and settlement element	0.10	45.00	CMG
Mar-23-22	B130	A104	Review memos to/from Pete Mirakian, Charlie Swayze re amount of title insurance and premiums	0.20	90.00	CMG
	B130	A104	Review to/from Kristi Johnson, Eric Johnson re sale order review	0.10	45.00	CMG
	B130	A104	Review memos to/from Eric Johnson/Chad Hammons re bid evidence in sale order	0.15	67.50	CMG
	B130	A104	Review memos to/from Marc Patterson re storage/disposition of chemicals as part of sale	0.15	67.50	CMG
	B130	A104	Review motion/order to expedite TSA motion	0.25	112.50	CMG
	B130	A104	Review memos to/from counsel re TSA motion	0.20	90.00	CMG
	B130	A104	Review notices re motion to expedite	0.20	90.00	CMG
	B130	A104	Review order to expedite TSA motion	0.20	90.00	CMG
	B130	A104	Review memos to/from Pete Mirakian, Charlie Swayze re title policy issues	0.20	90.00	CMG
	B130	A104	Review memos to/from Les Alvis re terms of sale order for CompuWeigh	0.20	90.00	CMG
Mar-24-22	B130	A104	Review memo from Eric Johnson re recap of assets	0.10	45.00	CMG
	B130	A104	Review memo from Kristi Johnson re	0.15	67.50	CMG

			objection to TSA/cash collateral motion and respond			
	B130	A104	Review BOC, PCA response	0.35	157.50	CMG
	B130	A104	Review memos to/from Marc Patterson, Roy Furrh re current MDEQ status as to sale	0.20	90.00	CMG
	B130	A104	Review minute entries	0.20	90.00	CMG
	B130	A104	Review witness/exhibit list	0.20	90.00	CMG
	B130	A103	Assist CMG drafting letter re exhibits for 3/24 hearing	0.10	20.00	KLC
Mar-25-22	B130	A104	Review memos to/from Charlie Swayze, Eric Johnson, Pete Mirakian re title insurance	0.20	90.00	CMG
Mar-27-22	B130	A104	Review memos to/from Charlie Swayze, Pete Mirakian re title insurance and related closing issues	0.15	67.50	CMG
Mar-28-22	B130	A104	Review sale order as revised	0.25	112.50	CMG
	B130	A104	Review draft TSA order; Review memos to/from Eric Johnson re same	0.75	337.50	CMG
	B130	A104	Review memos to/from Kristi Johnson, Eric Johnson re addition to sale order	0.15	67.50	CMG
	B130	A104	Review memos to/from Kristi Johnson re her comments to TSA order	0.15	67.50	CMG
Mar-29-22	B130	A106	Telephone conference with Dennis Gerrard re closing of sale and related issues	0.25	112.50	CMG
	B130	A104	Review memos to/from Eric Johnson, Charlie Swayze re insurance coverage, closing date	0.25	112.50	CMG
Mar-30-22	B310	A104	Review examiner's motion for access to interest data room	0.75	337.50	CMG
Mar-31-22	B130	A104	Review memos to/from Eric Johnson,	0.20	90.00	CMG

			Dennis Gerrard re possible damage to property due to weather and notification of insurance company of possible claim			
	B310	A104	Review order to submit order on motion for access to interest data room	0.10	45.00	CMG
	B310	A104	Review notice of hearing by telephone on examiner motion	0.20	90.00	CMG
Apr-01-22	B210	A103	Work on objection to Altro motion; Review and revision of same	0.45	202.50	CMG
	B210	A101	Trial preparation for Altro motion	0.30	135.00	CMG
	B210	A109	Attended Altro motion hearing re sale data to be offered	1.00	450.00	CMG
Apr-02-22	B130	A104	Review memos to/from Eric Johnson; Review NDA and data room access	0.20	90.00	CMG
Apr-04-22	B130	A104	Review letter from, dictation of letter to, Don Barrett re asset sale and its effect upon ESI	0.45	202.50	CMG
Apr-05-22	B130	A104	Review memos to/from Dennis Gerrard re sale and closing issues on costs	0.25	112.50	CMG
	B130	A104	Review memos to/from Dennis Gerrard re insurance claim - sale effect	0.20	90.00	CMG
Apr-06-22	B110	A104	Review Examiner request for documents; Review CRO response	0.40	180.00	CMG
	B130	A104	Review memo from Dennis Gerrard; Review GlassRatner NDA	0.55	247.50	CMG
	B130	A107	Telephone conference with Eric Johnson re carve outs and administrative claims	0.20	90.00	CMG
	B130	A104	Review memo from Dennis Gerrard; Review GlassRatner NDA markup	0.65	292.50	CMG
	B130	A104	Review memos to/from Kristi Johnson, Eric Johnson re sale order and cash collateral orders	0.20	90.00	CMG

	B130	A104	Review memo from Wayne Lewis re new account at Express re transition	0.10	45.00	CMG
	B130	A104	Review memos from Dennis Gerrard re sale/labor assignments	0.10	45.00	CMG
	B130	A104	Review memos to/from Dennis Gerrard re final approval of B. Riley NDA	0.20	90.00	CMG
	B160	A104	Review memos to/from Dennis Gerrard re payment for fees in dealing with examiner report	0.20	90.00	CMG
Apr-07-22	B130	A104	Review memos to/from Richard Peil; Review executed NDA from GlassRatner	0.25	112.50	CMG
	B130	A104	Review memos to/from Erin McManus, Kristi Johnson, Eric Johnson re sale/TSA orders	0.25	112.50	CMG
	B130	A104	Review memo from Eric Johnson re last revision of sale order; Review and approve sale order	0.25	112.50	CMG
	B130	A104	Review memos to/from Eric Johnson approving TSA order; Review TSA order update	0.20	90.00	CMG
	B130	A104	Review numerous memos to/from UMB, Debtor re bank account info	0.25	112.50	CMG
Apr-08-22	B130	A104	Review numerous memos to/from client, Vickie Beason, Wayne Lewis re post-sale cash management motions	0.25	112.50	CMG
	B130	A104	Review memos to/from Eric Johnson, Kristi Johnson re updated TSA order; Review updated TSA order and approve	0.25	112.50	CMG
	B130	A104	Review memos to/from Erin McManus re status of order on DK #2546	0.20	90.00	CMG
Apr-11-22	B130	A107	Telephone conference with Don Barrett; Review memos to/from Don Barrett, B. Reed re ESI from asset sale	0.25	112.50	CMG
	B130	A107	Telephone conference with David McMullen, Don Barrett re ESI storage and transition of ownership	0.25	112.50	CMG

Apr-12-22	B130	A104	Review memo from Charlie Swayze re real estate tax update	0.20	90.00	CMG
	B130	A104	Review memos to/from, telephone conference with, Kersten Holzhuetter, Peter Riggs re ESI and transition to UMB; Review memos to/from Heather Williams, UMB counsel re status of ESI transition	0.50	225.00	CMG
	B130	A104	Review notice - UMB	0.15	67.50	CMG
	B130	A104	Review memos to/from Alysha Cooke re Thoroughbred withdrawals and notices; Conference with CCT re same issue	0.25	112.50	CMG
	B130	A104	Review numerous memos to/from Heather Williams, Dennis Gerrard re ESI and transfer of computers, software, etc. to UMB	0.55	247.50	CMG
	B130	A104	Review memos to/from R. Barrett, Heather Williams re asset sale effect on ESI	0.35	157.50	CMG
	B130	A104	Receipt and review of Order Approving Transition Services Agreement, etc.; calendar various deadlines	0.15	30.00	KLC
Apr-13-22	B130	A108	Conference call with UMB, Heather Williams re ESI issues on sale	0.55	247.50	CMG
	B130	A104	Review memos to/from Dennis Gerrard; Review additional NDA mark up for sale/review	0.60	270.00	CMG
	B130	A104	Review draft asset closing motion and order; Review memos to/from Eric Johnson, Camber Jones re modifying order and motion	0.60	270.00	CMG
	B130	A104	Review memos to/from Heather Williams re Randy Moss at MicroSpeed to replace Pearman as IT contact	0.20	90.00	CMG
	B130	A104	Review memos to/from Thoroughbred counsel, CCT re returns to be made	0.40	180.00	CMG
	B130	A104	Review memos to/from Dennis Gerrard re finalizing Silverado sale	0.10	45.00	CMG

	B130	A104	Review memos to/from Eric Johnson, et al. re service of pleadings & TSA	0.20	90.00	CMG
	B130	A104	Review memo from Eric Johnson; Further review and approval of revised joint motion/order to extend closing; Review file re deadline	1.00	450.00	CMG
	B130	A104	Review entered order extending closing; Dictation of memo to CR3 team re same	0.25	112.50	CMG
	B130	A108	Conference call with Heather Williams, Eric Johnson, Peter Riggs, Kersten Holzhuetter re ESI, transfer of property to UMB and response to plaintiffs re ESI	0.55	247.50	CMG
	B130	A104	Review memos to/from Eric Johnson, Andrea Chase re noticing TSA order	0.15	67.50	CMG
Apr-14-22	B130	A104	Review numerous memos to/from James Baring, UMB staff re TSA accounts and transfers	0.40	180.00	CMG
	B130	A104	Review COS re generic order and closing	0.10	45.00	CMG
	B130	A104	Review memos to/from James Baring, Eric Johnson re copier lease	0.30	135.00	CMG
	B130	A104	Review memos to/from Dennis Gerrard re title to books and records of Debtor after sale to UMB closes	0.25	112.50	CMG
	B130	A104	Receipt and review of Agreed Order on Joint Motion to Extend Closing Date; calendar closing date	0.10	20.00	KLC
Apr-15-22	B130	A104	Review memos to/from Travis, Robert, James Baring re TSA, retainer, invoices for TSA and bank account delay	0.30	135.00	CMG
Apr-16-22	B130	A104	Review memos to/from Dennis Gerrard re ownership of books and records post-expiration of cash collateral	0.25	112.50	CMG
Apr-18-22	B130	A104	Review memos to/from Eric Johnson, CR3 re employee status and update	0.20	90.00	CMG

	B130	A104	Review memos to/from Eric Johnson, Dennis Gerrard re updated asset analysis	0.20	90.00	CMG
	B130	A107	Telephone conference with Charlie Swayze re closing date for UMB Bank purchase of assets	0.20	90.00	CMG
Apr-19-22	B130	A104	Review numerous memos to/from James Baring, UMB representative re insurance, personnel, billings and related transition issues	0.65	292.50	CMG
Apr-21-22	B130	A104	Review memos to/from James Baring, Eric Johnson re invoices, billing under TSA	0.25	112.50	CMG
Apr-22-22	B130	A104	Review memos to/from James Baring re reconciliation of sale/TSA funds/invoices	0.25	112.50	CMG
	B130	A104	Review memos to/from James Baring re future use of sale data room	0.20	90.00	CMG
Apr-27-22	B130	A104	Review memos to/from Charlie Swayze re postponing closing and tax increase	0.20	90.00	CMG
	B160	A103	Dictation of fee applications for LOCMG and CR3	1.10	495.00	CMG
Apr-28-22	B130	A104	Review motion/order re TSA and closing extension	0.45	202.50	CMG
	B130	A104	Review memos to/from Eric Johnson, Camber Jones approving extension papers	0.20	90.00	CMG
	B160	A104	Review and revision of itemizations	1.00	450.00	CMG
	B160	A104	Review and revision of CR3's itemizations and invoices	0.45	202.50	CMG
	B160	A104	Review and revision of fee applications	0.45	202.50	CMG
	B160	A103	Assist CMG reviewing and revising itemizations	1.10	220.00	KLC
Apr-29-22	B160	A103	Dictation of motions/orders to expedite; Review and revision of same	0.75	337.50	CMG

B160	A103	Dictation of orders on fees; Review and revision of same	0.75	337.50	CMG
B160	A103	Assist CMG drafting and revising CMG's Fee Application for Sale Issues, Certificate of Service and Order re same, Motion to Expedite Hearing and Order re same	2.00	400.00	KLC
B160	A103	Assist CMG drafting and revising CR3 Partners' Fee Application for Sale Issues, Certificate of Service and Order re same, Motion to Expedite Hearing and Order re same	0.75	150.00	KLC
Totals			210.05	<u>\$84,257.50</u>	

DISBURSEMENTS

EXPENSE CODE

Jan-14-22	E105	Long Distance	3.13
Jan-20-22	E101	Photocopies 23 @ \$.25 re mailout	5.75
	E108	Postage 2 @ \$1.76 re mailout	3.52
	E112	Court Fees COURTS/USBC-MS-N	188.00
Jan-24-22	E105	Long Distance	3.13
Jan-25-22	E105	Long Distance	3.13
Feb-17-22	E112	Court Fees COURTS/USBC-MS-N	188.00
Feb-20-22	E105	Long Distance Sale	3.13
Feb-22-22	E105	Long Distance Sale	2.13
	E105	Long Distance Sale	3.13
	E105	Long Distance Sale	3.13
Feb-24-22	E101	Photocopies 1200 @ \$.25 re auction/trial preparation	300.00
	E105	Long Distance	9.00
	E105	Long Distance	2.13
	E110	Out-of-town travel Mileage 184 miles @ \$.585/mile	107.64

	E110	Out-of-town travel Lodging	378.64
	E111	Meals	47.24
Feb-25-22	E110	Out-of-town travel Mileage 184 miles @ \$.585/mile	107.64
Feb-28-22	E105	Long Distance - Sale	2.00
Mar-02-22	E105	Long Distance - Sale	2.13
Mar-06-22	E105	Long Distance	2.13
Mar-07-22	E105	Long Distance - Sale	2.13
Mar-29-22	E105	Long Distance Sale	3.13
Apr-18-22	E105	Long Distance Sale	2.13
Totals			\$1,372.12
Total Fee & Disbursements			\$85,629.62
Balance Now Due			\$85,629.62

SUMMARY BY TIMEKEEPER

	RATE	HOURS	AMOUNT
Craig M. Geno	\$448.08	170.30	\$76,307.50
Kathryn L. Carter	\$200.00	39.75	\$7,950.00

TAX ID Number 45-4013160