

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

In re:

WHITE FOREST RESOURCES, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10195 (TMH)

(Jointly Administered)

**Objection Deadline: September 26, 2025 at 4:00
p.m. (ET)**

**SUMMARY OF CONSOLIDATED SIXTH MONTHLY AND FINAL FEE
AND EXPENSE APPLICATION OF RAINES FELDMAN LITTRELL LLP
FOR SERVICE RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Name of Applicant:	Raines Feldman Littrell LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	Effective February 26, 2025
Period for Which Final Compensation and reimbursement sought (the “ Final Period ”)	February 26, 2025 through August 29, 2025
Amount of compensation sought as actual, reasonable and necessary for the Final Period	\$449,344.00
Amount of expense reimbursement sought as actual, reasonable and necessary for Final Period	\$2,836.53
Amount of compensation sought as actual, reasonable and necessary for August 1, 2025 through August 29, 2025 (“Sixth Monthly”):	\$15,184.00

This is a(n) ☐ Interim ☐ Monthly ☒ Final Fee Application.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: White Forest Resources, Inc. (3764); Xinerger Corp. (3865); Xinerger of West Virginia, Inc. (2401); Shenandoah Energy, LLC (6770); South Fork Coal Company, LLC (3113); Bull Creek Processing Company, LLC (0894); Raven Crest Mining, LLC (0122); Brier Creek Coal Company, LLC (9999) Raven Crest Contracting, LLC (7796); Raven Crest Leasing, LLC (7844); and Raven Crest Minerals, LLC (7746). The Debtors’ service address is 1295 Ashford Hill Rd., Ashford, WV 25009.

PRIOR MONTHLY APPLICATIONS FILED

Date Filed	Period Covered	Requested Fees	Requested Expenses	Allowed Fees	Allowed Expenses
4/21/2025 [Dkt. 234]	February 27, 2025 – March 31, 2025	\$180,752.00	\$0	\$180,752.00 ²	\$0
5/16/2025 [Dkt. 272]	April 1, 2025 – April 30, 2025	\$117,080.00	\$2,048.53	\$117,080.00 ³	\$2,048.53
6/17/2025 [Dkt. 346]	May 1, 2025 – May 31, 2025	\$29,060.00	\$0	\$23,248.00	\$0
7/16/2025 [Dkt. 390]	June 1, 2025 – June 30, 2025	\$45,682.00	\$788.00	\$36,546.60	\$788.00
8/15/25 [Dkt. 430]	July 1, 2025 – July 31, 2025	\$61,586.00	\$0		

The total time expended in connection with the preparation of this fee application is not included herein as such time was expended after the Application Period.

INTERIM FEE APPLICATIONS:

		Requested		Approved	
Date Filed	Period	Fees	Expenses	Fees	Expenses
6/3/2025 [Dkt. 314]	2/26/2025 – 4/30/2025	\$297,832.00	\$2,048.53	\$292,332.00 ⁴	\$2,048.53

Objections to Monthly or Interim Fee Applications: None.

Compensation by Professional for the Final Period

Name of Professional	Position of the Applicant	Hourly Billing Rate	Total Billed Hours	Total Compensation
Hamid Rafatjoo	Partner	\$1,300.00	3.10	\$4,030.00
David Forsh	Partner	\$875.00	15.2	\$13,300.00
Kenneth Lund	Partner	\$875.00	168.4	\$147,350.00
Mark Melickian	Partner	\$865.00	120.4	\$104,146.00

² The Court's requested reduction is included in the interim fee application approved fees amount.

³ The Court's requested reduction is included in the interim fee application approved fee amount.

⁴ This amount reflects reduction requested by the Court.

Michael Roeschenthaler	Partner	\$860.00	13.3	\$11,438.00
Mark Eckard	Partner	\$780.00	17.5	\$13,650.00
Tina Roeschenthaler	Counsel	\$670.00	12.3	\$8,241.00
Harry Readshaw	Counsel	\$665.00	147.1	97,821.50
Daniel Schimizzi	Partner	\$615.00	.8	\$492.00
Sarah Wenrich	Associate	\$575.00	7.2	\$4,140.00
Jordan Kelly	Associate	\$485.00	2.8	\$1,358.00
Jesse Nelms	Associate	\$425.00	67.8	\$28,815.00
Bambi Clark	Paralegal	\$465.00	3.5	\$1,627.50
Michael Sally	Paralegal	\$465.00	1.5	\$697.50
Sandi Shidner	Paralegal	\$445.00	27.5	\$12,237.50
			608.4	\$449,344.00

Compensation by Professional for Sixth Monthly Period

Name of Professional	Position of the Applicant	Hourly Billing Rate	Total Billed Hours	Total Compensation
Kenneth Lund	Partner	\$875.00	5.2	\$4,550.00
Mark Melickian	Partner	\$865.00	8.8	\$7,612.00
Harry Readshaw	Partner	\$665.00	1.6	\$1,064.00
Sandi Shidner	Paralegal	\$445.00	4.4	\$1,958.00
		Total:	20	\$15,184.00

Compensation by Project Category for Final Period

Project Category	Total Hours	Total Fees
B110 – Case Administration	86.9	\$63,185.50
B120 – Asset Analysis and Recovery	42.1	\$27,132.50
B130 – Asset Disposition	135.7	\$100,541.00
B140 – Relief From Stay/Adequate Protection	8.3	\$6,919.50
B150 – Meetings and Communications with Creditors	18.6	\$14,437.50
B160 – Fee Applications and Objections	38.1	\$25,454.50
B170 – Employment Applications and Objections	15.7	\$10,528.50

B185 – Assumption/Rejection of Leases and Contracts	3.4	\$2,303.00
B190 – Other Contested Matters/Omnibus Hearings	73.1	\$53,330.50
B195 – Non-working Travel	10	\$8,650.00
B200 – Adversary Actions	.5	\$432.50
B210 – Business Operations	26.9	\$18,966.00
B220 – Employee Benefits/Pensions	1.5	\$1,312.50
B230 – Financing/Cash Collections	121.7	\$95,737.50
B235 – Financial Filings	4.6	\$3,752.00
B310 – Claims Administration and Objections	.8	\$692.00
B320 – Plan and Disclosure Statement	.9	\$785.00
	588.8	\$434,160.00

Compensation by Project Category for Sixth Monthly Period

Project Category	Total Hours	Total Fees
B110 – Case Administration	11.5	\$9,343.50
B130 – Asset Disposition	4.1	\$3,576.50
B150 – Meetings and Communications with Creditors	.5	\$332.50
B160 – Fee Applications and Objections	3.4	\$1,599.00
B190 – Other Contested Matters/Omnibus Hearings	.5	\$332.50
	20	\$15,184.00

Expense Summary for Final Period

Expense Category	Service Provider	Total Expense
Travel related expenses including airfare, lodging and meals for DIP Hearing		\$2,048.53

Pettit Records Research LLC; Search of all open Deeds of Trust, at County Clerk, Coone County , West VA against 2 entities		\$333.00
Pettit Records Research LLC; Search of all open Deeds of Trust, at County Clerk, Coone County , West VA against 7 entities		\$455.00
		\$2,836.53

Expense Summary for Sixth Monthly Period

None.

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FOR THE DISTRICT OF DELAWARE**

In re:

WHITE FOREST RESOURCES, INC., *et al.*,¹

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Chapter 11

Case No. 25-10195 (TMH)

(Jointly Administered)

**Objection Deadline: September 26, 2025 at 4:00
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**CONSOLIDATED SIXTH MONTHLY AND FINAL FEE
APPLICATION OF RAINES FELDMAN LITRELL LLP FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES AS COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE
PERIOD FROM FEBRUARY 26, 2025 THROUGH AND INCLUDING AUGUST 29, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code §§ 101-1532 (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), Raines Feldman Littrell LLP (“**RFL**”), counsel to the Official Committee of Unsecured Creditors (the “**Committee**”), hereby submits this consolidated sixth monthly and final application (the “**Application**”) for compensation and reimbursement of expenses for the period from February 26, 2025 through and including August 29, 2025 (the “**Application Period**”). By this Application, RFL seeks a monthly interim allowance of compensation in the amount of \$15,184.00 for August 1, 2025 through August 29, 2025 (the “**Sixth Monthly Period**”) and \$449,344.00 for final allowance of compensation for February 26, 2025 through August 29, 2025 (the “**Final Period**”) and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: White Forest Resources, Inc. (3764); Xinerger Corp. (3865); Xinerger of West Virginia, Inc. (2401); Shenandoah Energy, LLC (6770); South Fork Coal Company, LLC (3113); Bull Creek Processing Company, LLC (0894); Raven Crest Mining, LLC (0122); Brier Creek Coal Company, LLC (9999) Raven Crest Contracting, LLC (7796); Raven Crest Leasing, LLC (7844); and Raven Crest Minerals, LLC (7746). The Debtors’ service address is 1295 Ashford Hill Rd., Ashford, WV 25009.

\$15,184.00 for reimbursement of expenses for the Final Period in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 121] entered March 7, 2025 (the “**Interim Compensation Order**”). In support thereof, RFL respectfully represents as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over the Debtors, their estates, and this matter under 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding under 28 U.S.C. § 157(b).

2. Venue of this proceeding and this Application is proper in this district pursuant to 28 U.S.C. § 1408.

3. Pursuant to Local Rule 9013-1(f), RFL consents to the entry of a final order by the Court in connection with this Application, to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

4. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-1.

BACKGROUND

A. GENERAL BACKGROUND

5. On February 7, 2025 (the “**Petition Date**”), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned jointly administered chapter 11 cases (these “**Cases**”). The Debtors are authorized to continue operating their businesses and manage their properties as debtors in possession pursuant

to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these Cases.

6. On February 26, 2025, the Office of the United States Trustee appointed the Official Committee of Unsecured Creditors [D.I. 84] (the “**Committee**”).

7. On August 25, 2025, the Court entered the *Order (I) Converting These Chapter 11 Cases to Cases Under Chapter 7, (II) Establishing a Deadline for Filing Final Chapter 11 Fee Applications, and (III) Granting Related Relief* [D.I. 457] (the “Conversion Order”).

B. RETENTION OF RAINES FELDMAN LITRELL LLP

8. On March 20, 2025, the Committee filed the *Application to Retain and Employ Raines Feldman Littrell, LLP as Counsel for the Official Committee of Unsecured Creditors Pursuant to Bankruptcy Code Section 1103 Effective as of February 26, 2025* [D.I. 157] (the “**RFL Retention Application**”).

9. On April 7, 2025, the Court entered the *Order Approving [the RFL Retention Application]* [D.I. 209] (the “**RFL Retention Order**”).

RELIEF REQUESTED

10. Subject to Court approval, RFL seeks the final allowance of compensation on an hourly basis, plus reimbursement of actual, necessary expenses incurred by RFL during the Final Period. The rates charged by RFL in these Cases do not differ from the rates charged to RFL’s non-bankruptcy clients.

A. COMPENSATION REQUESTED

11. 8. Attached hereto as **Exhibit A** is an itemized list of tasks performed, the date on which each task was performed, and an hourly breakdown of the fees sought for services provided by RFL for the Sixth Monthly Period.

12. RFL is not seeking reimbursement of expenses in this Sixth Monthly Period but requests final approval reimbursement of expenses in the amount of \$15,184.00.

13. A copy of the computer-generated time entries reflecting the time recorded for these services, organized in project billing categories in accordance with the *United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (the "**Guidelines**"), is attached hereto as Exhibit A.

RESPONSES TO FEE GUIDELINES QUESTIONNAIRE

QUESTION	RESPONSE	EXPLANATION
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.	NO	N/A
If the fees sought in this fee application as compared to the fees budgeted for this time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A	N/A
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No	N/A
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices?	No	N/A
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information?	No	N/A
If the fee application includes any rate increases since retention: i. Did your client review and approve those rate increases in advance? ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the	N/A	N/A

representation, consistent with ABA formal Ethics Opinion 11-458?		
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LEGAL STANDARD

14. Section 330(a)(1) of the Bankruptcy Code allows the payment of:

- (A) Reasonable compensation for actual, necessary services rendered by the trustee, examiner, professional person, or attorney and by any paraprofessional person employed by any such person; and
- (B) Reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a)(1). Reasonableness of compensation is driven by the “market-driven approach” which considers the nature, extent and value of services provided by the professional and cost of comparable services in the non-bankruptcy contexts. See *Zolfo Cooper & Co. v. Sunbeam-Oster Co.*, 50 F.3d 253, 258 (3d Cir. 1995); *In re Busy Beaver Building Ctr., Inc.*, 19 F.3d 833, 849 (3d Cir. 1994). Thus, the “baseline rule is for firms to receive their customary rates.” *Zolfo Cooper*, 50 F.3d at 259.

15. In accordance with its practices in non-bankruptcy matters, RFL has calculated its compensation requested in this Application by applying its standard hourly rates. RFL’s calculation is based upon hourly rates that are well within the range of rates that are charged by comparable firms in similar bankruptcy cases. Accordingly, RFL’s rates should be determined to be reasonable under section 330 of the Bankruptcy Code.

16. RFL’s fees during the Application Period are also reasonable under the prevailing legal standard and should be allowed. The amount of these fees is not unusual given the complexity, accelerated deadlines, and size of these Cases. RFL’s fees are commensurate with fees that other attorneys of comparable experience and expertise have charged and been awarded in similar chapter 11 cases. Accordingly, RFL’s fees are reasonable pursuant to section 330 of the Bankruptcy Code.

17. Section 330(a)(1)(B) of the Bankruptcy Code permits reimbursement for actual, necessary expenses. As stated above, RFL incurred out-of-pocket expenses during this Sixth Monthly Period in the amount of \$0.

18. Except as permitted by Bankruptcy Rule 2016, no agreement or understanding exists between RFL and/or any third person for the sharing or division of compensation. All the services for which compensation is requested in this Application were rendered at the request of and solely on behalf of the Committee.

19. Pursuant to the standards set forth in sections 330 and 331 of the Bankruptcy Code, RFL submits that the compensation requested is for actual and necessary services and expenses, and is reasonable, based upon the nature, extent and value of such services, the time spent thereon, and the costs of comparable services in a case under the Bankruptcy Code.

20. The time records annexed to this Application constitute only a general statement of the services rendered and time expended without description of the pressure and constraints under which RFL actually rendered these services. The considerable challenges of this case have been attended to and managed by RFL at all levels, promptly, expertly, and often to the exclusion of the other matters in RFL's office. RFL submits, therefore, that its fees and expenses were actual, necessary, reasonable, and justified, and should be allowed in full.

RESERVATION OF RIGHTS

21. To the extent time or disbursement charges for services rendered or disbursements incurred relate to the Application Period but were not processed prior to the preparation of this Application, or RFL has for any other reason not sought compensation or reimbursement of expenses herein with respect to any services rendered or expenses incurred during the Application

Period, RFL reserves the right to request additional compensation for such services and reimbursement of such expenses in a future application.

CERTIFICATE OF COMPLIANCE AND WAIVER

22. Pursuant to Local Rule 2016-1 (g), the undersigned representative of RFL certifies that he has reviewed the requirements of Local Rule 2016-1, 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 2016-1, RFL believes that such deviations are not material and respectfully requests that any such requirements be waived.

23. Pursuant to the Interim Compensation Order, notice of the Fee Application has been served upon (collectively, the “**Notice Parties**”): (i) the Office of the U.S. Trustee for the District of Delaware; (ii) counsel to the Debtors; (iii) counsel to the DIP Term Loan Agent and DIP Term Loan Lenders, and (iv) counsel to the DIP Revolving Lender and the Prepetition Revolving Lender.

24. Pursuant to the Conversion Order, objections to this Fee Application, if any, must be served upon the Notice Parties no later than **September 26, 2025** at 4:00 p.m. (Eastern) (the “**Objection Deadline**”).

25. A hearing to consider the Fee Application shall be held on a date to be scheduled by the Court.

CONCLUSION

WHEREFORE, RFL respectfully requests (a) that it be allowed interim allowance of compensation in the amount of \$15,184.00 for August 1, 2025 through August 29, 2025; (b) \$449,344.00 for final allowance of compensation for February 26, 2025 through August 29, 2025 and (c) \$15,184.00 for reimbursement of expenses for the Final Period.

RAINES FELDMAN LITTRELL LLP

Dated: September 12, 2025

/s/ Mark W. Eckard

Mark W. Eckard (No. 4542)
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Wilmington, DE 19801
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- and -

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*Counsel to the Official Committee
of Unsecured Creditors*

EXHIBIT A



1900 Avenue of the Stars, 19th Floor
 Los Angeles, CA 90067
 (310) 440-4100
 www.raineslaw.com
 Federal Tax ID: 20-4515337

Invoice Date: 9/10/2025

Invoice Number: 138974

Official Committee of Unsecured Creditors of In re White Forest Resour
 Ryan Hager, Committee Chair

8422-001 / Creditors Committee Representation

Professional Services				Hours	Rate	Amount
08/01/2025	SXS	B110	Review agenda for 8/5 hearing, update calendar	0.10	445.00	44.50
08/07/2025	KJL	B110	Analysis of strategic options and related follow up	0.50	875.00	437.50
08/08/2025	MSM	B110	Call with A. Root regarding sale and case status (0.2); email memorandum to Committee team regarding same (0.1)	0.30	865.00	259.50
08/08/2025	SXS	B110	Review docket and update calendar dates/deadlines	0.20	445.00	89.00
08/11/2025	MSM	B110	Email exchanges with K. Lund regarding case status (0.1); email to A. Root regarding case status (n/c)	0.10	865.00	86.50
08/13/2025	MSM	B110	Call with A. Root regarding status (0.1); call with K. Lund regarding same (0.2)	0.30	865.00	259.50
08/14/2025	MSM	B110	Email exchange with A. Root regarding status	0.10	865.00	86.50
08/14/2025	SXS	B110	Review docket and update calendar	0.10	445.00	44.50
08/15/2025	KJL	B110	Analysis of Debtor's proposed Motion to Convert and calls and emails with Debtor's counsel regarding same (0.7); follow up re options, including calls with interested parties (0.5)	1.20	875.00	1,050.00
08/15/2025	MSM	B110	Conference call with K. Lund, M. Roeschenthaler (0.2) plus A. Root (0.2) regarding case status and next steps; review motion to convert and order (0.3); email to Committee team regarding proposed conversion order (0.1); call with H. Readshaw regarding same (0.1); review/circulate filed motion to convert and related motion to shorten time (0.2)	1.10	865.00	951.50
08/18/2025	MSM	B110	Call with L. Appleby regarding case path (0.3); call with K. Lund regarding same (0.1); call with A. Root regarding same (0.1); draft email to Committee team summarizing case issues with lenders (0.2)	0.70	865.00	605.50
08/19/2025	SXS	B110	Update calendar dates/deadlines	0.20	445.00	89.00

08/20/2025	HAR	B110	Review local and chambers rules regarding hearing participation (.1); analyze strategy regarding pending motions and potential alternative buyer(.4)	0.60	665.00	399.00
08/20/2025	MSM	B110	Email exchanges with Committee professional team about scheduled Friday hearing on conversion	0.20	865.00	173.00
08/20/2025	SXS	B110	Prepare attorney hearing binder for 8/22	0.30	445.00	133.50
08/20/2025	SXS	B110	Register M. Melickian for virtual appearance at 8/22 hearing	0.20	445.00	89.00
08/22/2025	KJL	B110	Discussion with RFL team re motion to convert and hearing	0.30	875.00	262.50
08/22/2025	MSM	B110	Pre-hearing email exchanges (0.3) and call (0.2) with A. Root regarding conversion order; attend hearing on motion to convert by Zoom (1.2); follow up call with K. Lund regarding outcome (0.2); review/comment on draft conversion order (0.2); email memorandum to Committee professional team summarizing final order and upcoming dates (0.5)	2.60	865.00	2,249.00
08/25/2025	SXS	B110	Update calendar dates/deadlines	0.10	445.00	44.50
08/26/2025	MSM	B110	Prepare information for A. Root related to conversion (0.5); call with A. Root regarding same (0.1)	0.60	865.00	519.00
08/27/2025	MSM	B110	Call with A. Root regarding status of conversion and related issues	0.20	865.00	173.00
08/28/2025	MSM	B110	Multiple email exchanges with Committee team professionals and Alan Root regarding conversion and carve out protocols	0.50	865.00	432.50
08/29/2025	MSM	B110	Call with A. Root (0.1) and K. Lund (0.1) regarding conversion issues; email exchanges with A. Root (0.4) and internal Committee team (0.4) regarding conversion issues	1.00	865.00	865.00
Sub-total: B110 Case Administration						9,343.50
08/01/2025	MSM	B130	Call with A. Root regarding sale status (0.1); internal email to Committee team regarding same (0.1)	0.20	865.00	173.00
08/04/2025	KJL	B130	Confer with L. Evans and H. Readshaw regarding status of South Fork sales process	0.40	875.00	350.00
08/07/2025	KJL	B130	Communications with Force 10 and Raines team regarding status of sale hearing and other case matters	0.90	875.00	787.50
08/13/2025	KJL	B130	Confer with M. Melickian regarding status of South Fork sale process	0.30	875.00	262.50
08/18/2025	KJL	B130	Confer with L. Evans regarding regarding potential bidder for South Fork Assets and status of matter	0.40	875.00	350.00
08/19/2025	KJL	B130	Confer with Debtor's counsel and L. Evans regarding potential bid for South Fork Assets	0.50	875.00	437.50
08/20/2025	KJL	B130	Analysis of revised Asset Purchase Agreement and confer with M. Melickian regarding sale hearing	0.50	875.00	437.50
08/20/2025	MSM	B130	Call with A. Root regarding status of sale (0.1); call with L. Appleby regarding status of sale	0.30	865.00	259.50
08/20/2025	MSM	B130	Review new APA proposal from Spectrum affiliate (0.2); email exchanges with Committee professional team regarding same (0.2)	0.40	865.00	346.00

08/20/2025	MSM	B130	Email to L. Appleby with Committee response to new APA	0.20	865.00	173.00
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Sub-total: B130 Asset Disposition					3,576.50
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08/25/2025	HAR	B150	Review order converting case to Chapter 7 (.1); provide detailed update to committee members regarding conversion (.4)	0.50	665.00	332.50
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Sub-total: B150 Meetings and Communications w/ Creditors					332.50
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08/01/2025	SXS	B160	Finalize and file Certification of Counsel regarding Raines' interim fee application, upload proposed form of order	0.20	445.00	89.00
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08/01/2025	SXS	B160	Retrieve, review and circulate order approving Raines' interim fee application	0.10	445.00	44.50
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08/05/2025	SXS	B160	Correspondence with counsel regarding status of monthly fee applications	0.10	445.00	44.50
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08/08/2025	SXS	B160	Draft, finalize and file Certificate of No Objection to Raines' June monthly fee application	0.30	445.00	133.50
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08/08/2025	SXS	B160	Draft, finalize and file Certificate of No Objection to MERA's June monthly fee application	0.30	445.00	133.50
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08/08/2025	SXS	B160	Draft, finalize and file Certificate of No Objection to Force 10's June monthly fee application	0.30	445.00	133.50
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08/15/2025	KJL	B160	Review fee apps	0.20	875.00	175.00
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08/15/2025	SXS	B160	Draft, finalize and file Raines' July monthly fee application	1.20	445.00	534.00
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08/15/2025	SXS	B160	Finalize and file Force 10's July monthly fee application	0.20	445.00	89.00
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08/15/2025	SXS	B160	Finalize and file MERA's July monthly fee application	0.20	445.00	89.00
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08/15/2025	SXS	B160	Coordinate service of Committee professionals' fee applications	0.20	445.00	89.00
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08/22/2025	SXS	B160	Correspondence with counsel regarding timing of final fee application filing	0.10	445.00	44.50
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Sub-total: B160 Fee Applications/Objections					1,599.00
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08/15/2025	HAR	B190	Review/Analyze draft of motion to convert case and provide comments to A. Root regarding same.	0.50	665.00	332.50
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Sub-total: B190 Other Contested Matters/ Omnibus Hearing					332.50
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Sub-total Fees:	\$15,184.00
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Total Current Billing:	\$15,184.00
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Rate Summary

Kenneth J. Lund	5.20 hours at \$875.00/hr	\$4,550.00
Mark S. Melickian	8.80 hours at \$865.00/hr	\$7,612.00
Harry A. Readshaw	1.60 hours at \$665.00/hr	\$1,064.00
Sandi Shidner	4.40 hours at \$445.00/hr	\$1,958.00
Total hours:	20.00	\$15,184.00

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

In re:

WHITE FOREST RESOURCES, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10195 (TMH)

(Jointly Administered)

**Objection Deadline: September 26, 2025 at 4:00
p.m. (ET)**

**NOTICE OF CONSOLIDATED SIXTH MONTHLY AND FINAL
FEE APPLICATION OF RAINES FELDMAN LITRELL LLP FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM FEBRUARY 26, 2025, THROUGH AND INCLUDING AUGUST 29, 2025**

PLEASE TAKE NOTICE that on September 12, 2025, Raines Feldman Littrell LLP, counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) in the above-captioned matter, filed and caused to be served the *Consolidated Sixth Monthly and Final Fee Application of Raines Feldman Littrell LLP for Compensation and Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors for the Period from February 26, 2025 through and Including August 29, 2025* (the “**Fee Application**”) seeking compensation in the amount of \$15,184.00 for August 1, 2025 through August 29, 2025; (b) \$449,344.00 for final allowance of compensation for February 26, 2025 through August 29, 2025 and (c) \$15,184.00 for reimbursement of expenses for the Final Period. A copy of the Fee Application is attached hereto.

PLEASE TAKE FURTHER NOTICE that objections or responses to the Fee

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: White Forest Resources, Inc. (3764); Xinery Corp. (3865); Xinery of West Virginia, Inc. (2401); Shenandoah Energy, LLC (6770); South Fork Coal Company, LLC (3113); Bull Creek Processing Company, LLC (0894); Raven Crest Mining, LLC (0122); Brier Creek Coal Company, LLC (9999) Raven Crest Contracting, LLC (7796); Raven Crest Leasing, LLC (7844); and Raven Crest Minerals, LLC (7746). The Debtors’ service address is 1295 Ashford Hill Rd., Ashford, WV 25009.

Application, if any, must be made in writing and filed with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Court”), on or before **September 26, 2025 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon (i) counsel to the Debtors, Chipman Brown Cicero & Cole LLP, 1313 N. Market Street, Suite 5400, Wilmington, DE 19801 (Attn: William E. Chipman, Jr.; email: chipman@chipmanbrown.com; and Alan M. Root; email: root@chipmanbrown.com); (ii) counsel to the DIP Term Loan Agent and the DIP Term Loan Lenders, Faegre Drinker Biddle & Reath LLP, 1177 Avenue of the Americas, 41st Floor, New York, NY 10036 (Attn: Laura E. Appleby; email: laura.appleby@faegredrinker.com); (iii) counsel to the DIP Revolving Lender and the Prepetition Revolving Lender, Bowen Law Group, PO Box 173442, Tampa, FL 33672 (Attn: Chad S. Bowen; email: chad@bowenlg.com); and Gellert Seitz Busenkell & Brown, LLC, 1201 N. Orange Street, Suite 300, Wilmington, DE 19801 (Attn: Michael Busenkell; email: mbusenkell@gsbblaw.com); (iv) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lock Box 35, Wilmington, Delaware 19801 (Attn: Joseph Cudia; email: joseph.cudia@usdoj.gov); and (v) counsel to the Committee, Raines Feldman Littrell LLP, 824 N. Market Street, Suite 805, Wilmington, DE 19801 (Attn: Thomas J. Francella, Jr., email: tfrancella@raineslaw.com; and Mark W. Eckard, email: meckard@raineslaw.com); and Raines Feldman Littrell LLP, 11 Stanwix Street, Suite 1100, Pittsburgh, PA 15222 (Attn: Michael J. Roeschenthaler, email: MRoeschenthaler@RainesLaw.com; Kenneth J. Lund, email: KLund@RainesLaw.com; and Harry A. Readshaw, email: HReadshaw@RainesLaw.com).

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE FINAL FEE APPLICATION WILL BE HELD AT A TIME AND DATE TO BE SCHEDULED BY THE COURT.

RAINES FELDMAN LITTRELL LLP

Dated: September 12, 2025

/s/ Mark W. Eckard

Mark W. Eckard (No. 4542)
824 N. Market Street, Suite 805
Wilmington, DE 19801
Telephone: (302) 647-1018
MEckard@RainesLaw.com

- and -

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of Unsecured Creditors*