

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related Doc No.:164, 229, 359 & 475
v.	Hearing Date:
NO RESPONDENT.	Hearing Time:
	Response Deadline:

**SUMMARY OF EXPEDITED FINAL FEE APPLICATION OF RAINES FELDMAN
LITRELL, LLP, FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD JANUARY 6, 2025 THROUGH JUNE 3, 2025**

Name of Applicant:	Raines Feldman Littrell, LLP
Authorized to provide professional services to:	Wilson Creek Energy, LLC, <i>et al.</i>
Petition Date:	January 6, 2025
Date of retention:	January 28, 2025, effective as of January 6, 2025, <i>see</i> Doc. No. 192
This is a:	Final Fee Application
Period for which compensation and reimbursement are sought:	January 6, 2025 – June 3, 2025

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors' address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

Compensation Sought as Actual, Reasonable and Necessary:	\$1,866,000.50
Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$41,443.27
Blended Hourly Rate (Final Application):	\$700.90
Payments Previously Received Pursuant to Fee Statements:	\$1,589,443.50 in fees and \$39,693.72 in expenses
Payment Requested in Connection with Final Application	\$276,557.00 in fees and \$1,749.55 in expenses for a total of \$278,306.55

SUMMARY OF PRIOR MONTHLY FEE STATEMENTS

DATE FILED	PERIOD COVERED	REQUESTED		UNOPPOSED		PAID		HOLDBACK FEES
		FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES	
2/12/2025	1/6/2025 – 1/31/2025	\$430,937.60	\$20,055.87	\$430,937.60	\$20,055.87	\$430,937.60	\$20,055.87	\$107,734.40
3/14/2025	2/1/2025 – 2/28/2025	\$262,573.60	\$0	\$262,573.60	\$0	\$262,573.60	\$0	\$65,643.40
4/11/2025	3/1/2025 – 3/31/2025	\$406,696.40	\$16,003.50	\$406,696.40	\$16,003.50	\$406,696.40	\$16,003.50	\$101,674.10
5/12/2025	4/1/2025 – 4/30/2025	\$214,184.00	\$3,634.35	\$214,184.00	\$3,634.35	\$214,184.00	\$3,634.35	\$53,546.00
	Totals:	\$1,100,207.60	\$36,059.37	\$1,100,207.60	\$36,059.37	\$1,100,207.60	\$36,059.37	\$275,051.90

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

DATE FILED	PERIOD COVERED	ORDER ENTERED	REQUESTED		ALLOWED		PAID	
			FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES
4/23/2025	1/6/2025 – 3/31/2025		\$1,100,207.60	\$36,059.37	\$1,100,207.60	\$36,059.37	\$1,100,207.60	\$36,059.37
		Totals:	\$1,100,207.60	\$36,059.37	\$1,100,207.60	\$36,059.37	\$1,100,207.60	\$36,059.37

COMPENSATION BY PROFESSIONAL

The attorneys who rendered professional services in these Chapter 11 Cases from January 6, 2025 through June 3, 2025 (the “Final Application Period”) are:

NAME OF PROFESSIONAL	POSITION	DEPT.	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Michael J. Roeschenthaler	Partner	Bankruptcy	2001	\$860.00	432.6	\$372,036.00
Kenneth J. Lund	Partner	Bankruptcy	1991	\$875.00	137.5	\$120,312.50
Eric Blum	Partner	Corporate	1998	\$845.00	46.8	\$39,546.00
Gregg B. Shulklapper	Partner	Corporate	1993	\$925.00	0.8	\$740.00
Keith E. Whitson	Partner	Bankruptcy	1993	\$910.00	1.6	\$1,456.00
Daniel R. Schimizzi	Partner	Bankruptcy	2011	\$615.00	298	\$183,270.00
Mark Melickian	Partner	Bankruptcy	1995	\$865.00	2.1	\$1,816.50
Matthew Schiff	Partner	Labor & Employment	1982	\$720.00	14.7	\$10,584.00
Scott Hare	Partner	Litigation	1991	\$920.00	1.1	\$1,012.00
Ronald W. Crouch	Counsel	Bankruptcy	1981	\$825.00	90.7	\$74,827.50
Harry A. Readshaw	Counsel	Bankruptcy	2006	\$665.00	63.3	\$42,094.50

Mark A. Lindsay	Counsel	Bankruptcy	2002	\$780.00	749.7	\$584,766.00
Tina Roeschenthaler	Counsel	Bankruptcy	2001	\$670.00	138	\$92,460.00
Sarah E. Wenrich	Associate	Bankruptcy	2018	\$575.00	177.8	\$102,235.00
Jordan N. Kelly	Associate	Bankruptcy	2020	\$485.00	426.9	\$206,561.50
Jesse D. Nelms	Associate	Litigation	2024	\$425.00	56.7	\$24,097.50
Total for Attorneys:					2,638.3	\$1,857,815.00

The paraprofessionals and other staff who rendered professional services in these Chapter 11 Cases during the Final Application Period are:

NAME OF PARAPROFESSIONAL OR STAFF MEMBER	POSITION	DEPT.	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Lela M. Lescalette	Paralegal	Bankruptcy	\$375.00	14.3	\$3,675.00
Michael Sally	Paralegal	Bankruptcy	\$465.00	9.7	\$4,510.50
Total for Paraprofessionals and Other Staff:					\$8,185.50

COMPENSATION BY PROFESSIONAL CATEGORY

PROFESSIONALS	BLENDED RATE	TOTAL HOURS	TOTAL COMPENSATION
Partners	\$781.41	935.2	\$730,773.00
Counsel	\$762.36	1,041.7	\$794,148.00
Associates	\$503.32	661.4	\$332,894.00
Paralegals	\$341.06	24	\$8,185.50
Blended Hourly Rate/Total Fees		2,662.3	\$1,866,000.50
Less Amounts Paid Pursuant to Interim Compensation Order and Fee Statements			
Total Fees Requested			

COMPENSATION BY PROJECT CATEGORY

NO.	PROJECT CATEGORY	TOTAL HOURS BILLED	TOTAL COMPENSATION
B110	Case Administration	304.7	\$208,432.50
B120	Asset Analysis and Recovery	128.3	\$91,190.50
B130	Asset Disposition	822.6	\$606,885.50
B140	Relief from Stay / Adequate Protection	1.5	\$1,212.50
B150	Meetings and Communications with Creditors	32.6	\$23,963.50
B160	Fee Applications and Objections to Fee Applications	45.4	\$23,728.00
B170	Employment Applications and Objections	56.1	\$34,563.50
B185	Assumption / Rejection of Leases	114.2	\$70,599.50
B190	Other Contested Matters and Omnibus Hearings	528.3	\$332,537.50
B200	Adversary Actions	6.7	\$4,894.00
B205	State Court Matters	11.3	\$7,132.00
B210	Business Operations	279.9	\$207,831.50
B220	Employee Benefits	40.5	\$28,296.00
B230	Financing/ Cash Collateral	68.1	\$50,548.00

B235	Financial Filings	12.9	\$10,635.50
B240	Tax Issues	5.2	\$3,816.50
B250	Real Estate	3.2	\$2,493.50
B260	Board of Directors Matters	9.4	\$6,761.00
B310	Claims Administration and Objections	143.4	\$114,360.00
B320	Plan and Disclosure Statement	47.1	\$34,433.50
B410	Restructuring	1.1	\$946.00
E124	*Time accidently billed as an expense.	0.8	\$740.00
	TOTAL:	2,662.3	1,866,000.50
	Less Amounts Paid Pursuant to Interim Compensation Order and Fee Statements		\$1,589,443.50
	Total Fees Requested		\$276,557.00

**IN THE UNITED STATES BANKRUPTCY COURT
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In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related to Document No.: 164, 229, 359 & 475
v.	Hearing Date:
NO RESPONDENT.	Hearing Time:
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**FINAL FEE APPLICATION OF RAINES FELDMAN LITTRELL, LLP, FOR
PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF JANUARY 6, 2025 THROUGH JUNE 3, 2025
AND REQUEST FOR EXPEDITED HEARING**

Pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, rule 2016 of the Federal Rules of Bankruptcy Procedure, rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Western District of Pennsylvania, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [Doc. No. 164] (the “Interim Compensation Order”), Raines Feldman Littrell, LLP (“Raines”), counsel for the Debtors, hereby files this *Final Fee Application of Raines Feldman Littrell, LLP for Payment of Compensation and Reimbursement of Expenses for the Period of January 6, 2025*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

Through June 3, 2025 and Request for an Expedited Hearing (the “Final Application”) for: (i) final allowance and approval of reasonable compensation for professional services rendered by Raines during period of January 6, 2025 through June 3, 2025 (the “Final Application Period”); (ii) final allowance and approval reimbursement of actual and necessary expenses and disbursements incurred by Raines during the Final Application Period in rendering professional services on behalf of the Debtors; (iii) payment of any outstanding compensation for professional fees and reimbursement of expenses approved and allowed on a final basis; and (iv) final allowance and approval of compensation for the actual, reasonable, and necessary professional services to be rendered as bankruptcy counsel for the Debtors in these Chapter 11 Cases during period of June 4, 2025 through June 16, 2025; and in support thereof respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are sections 330, 331, 503(b)(2), and 507(a)(2) of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

STATUS OF THE CHAPTER 11 CASES

3. On January 6, 2025 (the “Petition Date”), the Debtors filed voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code. A description of the Debtors’ business, corporate structure, and events leading to the Debtors’ chapter 11 cases is set forth in the *Amended Declaration of Kevin Harrigan, Chief Executive Officer of Wilson Creek Energy, LLC and its Affiliated Debtors, in Support of Chapter 11 Petitions and Various First Day Motions* [Doc. No. 51-1], which is incorporated herein by reference.

4. The Debtors are authorized to operate their businesses and manage their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. As of the date hereof, no trustee or examiner has been appointed in the Chapter 11 Cases.

5. On January 24, 2025, the United States Trustee for the Western District of Pennsylvania appointed an official committee of unsecured creditors in these Chapter 11 Cases (the “Committee”) pursuant to section 1102 of the Bankruptcy Code.

6. On January 27, 2025, this Court entered the Interim Compensation Order [Doc. No. 164], which authorized Raines and other retained professionals of the estates to file monthly fee statements, interim fee applications, and final fee applications. The Interim Compensation Order authorized the Debtors to pay an amount equal to 80% of the fees and 100% of the expenses requested in the monthly fee statements that are not subject to an objection.

7. On January 28, 2025, this Court entered an order [Doc. No. 192] (the “Retention Order”) authorizing Raines to serve as counsel to the Debtors effective as of January 6, 2025. A copy of the Retention Order is attached hereto as **Exhibit A**.

8. Since the filing of the *First Interim Fee Application of Raines Feldman Littrell, LLP, for Payment of Compensation and Reimbursement of Expenses for the Period January 6, 2025 through March 31, 2025* [Doc. No. 507] (the “Interim Fee Application”), the Debtors have: (i) successfully closed on three court approved sales transactions; (ii) resolved various disputes with the Pennsylvania Department of Environmental Protection as more fully set forth in the *Expedited Motion for Order Approving Settlement Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure* [Doc. No. 565], which this Court approved on May 29, 2025, *see* Doc. No. 578; and (iii) continued to facilitate a full and final winddown of the Debtors remaining *de minimis* assets in an effort to bring these Chapter 11 Cases to their conclusion.

9. In furtherance of an orderly winddown process, on June 3, 2025, the Debtors filed an *Expedited Motion for Entry of an Order (I) Dismissing the Chapter 11 Cases; (II) Exculpating Certain Parties from Liability in Connection with the Chapter 11 Cases; (III) Terminating Engagement of Claims Agent; (IV) Recognition of Final Fee Applications; and (V) Granting Related Relief* [Doc. No. 593] (the “Motion to Dismiss”). This Court scheduled an expedited hearing on the Motion to Dismiss for June 16, 2025, at 10:00 AM. See Doc. No. 596.

RELIEF REQUESTED

10. Raines submits this Final Application for (i) final allowance and approval of compensation for the actual, reasonable, and necessary professional services that it has rendered as bankruptcy counsel for the Debtors in these Chapter 11 Cases during the Final Application Period; (ii) final allowance and approval of actual, reasonable, and necessary expenses incurred by Raines in representing the Debtors during the Final Application Period; (iii) payment of any outstanding compensation for professional fees and reimbursement of expenses approved and allowed on a final basis; and (iv) final allowance and approval of compensation for the actual, reasonable, and necessary professional services to be rendered as bankruptcy counsel for the Debtors in these Chapter 11 Cases during period of June 4, 2025 through June 16, 2025.

PRIOR MONTHLY FEE STATEMENTS AND INTERIM FEE APPLICATION

11. Prior to the submission of this Final Fee Applications, in accordance with the Interim Compensation Procedures Order, Raines filed four (4) monthly fee statements (collectively, the “Monthly Fee Statements”):

- a. Monthly Fee Statement of Raines Feldman Littrell, LLP for the Period of January 6, 2025 through January 31, 2025 (Doc. No. 229);

- b. Monthly Fee Statement of Raines Feldman Littrell, LLP for the Period of February 1, 2024 through February 28, 2025 (Doc. No. 359);
- c. Monthly Fee Statement of Raines Feldman Littrell, LLP for the Period of March 1, 2025 through March 31, 2025 (Doc. No. 475); and
- d. Monthly Fee Statement of Raines Feldman Littrell, LLP for the Period of April 1, 2025 through April 30, 2025 (Doc. No. 537).

12. True and correct copies of the Monthly Fee Statements are included in **Exhibit D**.

13. As also noted above, on April 23, 2025, Raines submitted its first and only Interim Fee Application for the period from January 6, 2025, through March 31, 2025. Among other things, the Interim Fee Application: (i) sought the allowance and approval of actual, reasonable, and necessary compensation for legal services rendered by Raines to the Debtors in the amount of \$1,375,259.50; (ii) sought the allowance and approval of the reimbursement of actual, reasonable and necessary expenses totaling \$36,059.37; (iii) include a report on the status of the Chapter 11 Cases at that time, a summary of both professional compensation and reimbursement of expenses requested, as well as the services Raines provided; and (iv) the exhibits required under the large case fee guidelines. A true and correct copy of the Interim Fee Application is included in **Exhibit D**.

14. As a result of the Interim Fee Application not including Raines' Monthly Fee Statement for April, 2025, the amount due and owing to Raines for actual, reasonable, and necessary compensation for legal services rendered to the Debtors in April, 2025, is \$53,546.00 (which is the 20% holdback of the total fees sought of \$214,184.00 for April, 2025).

15. In addition to the amounts requested in connection with the Monthly Fee Statements and the Interim Fee Application, Raines incurred fees in the amount of \$223,011.00

during the period of May 1, 2025 through June 3, 2025. Further, Raines actual, reasonable, and necessary expenses for the period of May 1, 2025, through June 3, 2025, total \$1,749.55. True and correct copies of the invoices for the period of May 1, 2025, through June 3, 2025, are also included in **Exhibit D**.

16. As of the date of this Application, Raines has yet to receive the 20% holdback for the fees requested in the April, 2025, Monthly Fee Statement, and has not received any compensation for the fees and expenses incurred from May 1, 2025 through June 3, 2025.

REQUEST FOR APPROVAL OF PROSPECTIVE FEES

17. The Debtors further seek allowance and approval of prospective fees and expenses, subject to and in accordance with the approved Extended Wind Down Budget and Second Cash Collateral Stipulation, for legal services to be rendered by Raines from June 4, 2025 through and including June 16, 2025, which is the date set for the hearing on the Debtors' Expedited Motion to Dismiss, without need for further order of court.

18. Pursuant to the *Amended Second Stipulation and Agreed Order Between the Debtors, the Committee, and KeyBank National Association (I) Extending the Use of Cash Collateral and (II) Modifying Certain Terms Under the Final DIP Order* [Doc. No. 581] (the "Second Cash Collateral Stipulation")², the Debtors filed an Extended Wind Down Budget for use of cash collateral during the Extended Wind Down Period. The Debtors anticipate additional fees and expenses will accrue following the submission of this Application through the hearing on the Expedited Motion to Dismiss set for June 16, 2025 and the Debtors hereby seek prospective

² Capitalized terms contained in paragraphs 17 through 19 and not defined therein have the meanings ascribed to them in the Second Cash Collateral Stipulation.

approval of said fees and expenses up to the amounts provided for in the Extended Wind Down Budget.

19. To confirm that the prospective fees and expenses for which the Debtors hereby seek approval are within the amounts permitted under the Extended Wind Down Budget, the Debtors submit that Raines will file with the Court a final statement of actual fees and expenses rendered for the period of June 4, 2025 through and including the date on the Debtor's Motion to Dismiss.

THE FINAL FEE APPLICATION

20. Pursuant to the Interim Compensation Order, Raines submits this Final Fee Application seeking: (i) final allowance and approval of compensation for professional services rendered to the Debtors during the Final Application Period in the total amount of \$1,866,000.50; (ii) final allowance and approval of all expenses billed during the Final Application Period in the amount of \$41,443.27; (iii) authorizing and directing the Debtors to pay Raines the amount of \$278,306.55, representing the total compensation and reimbursement of expenses authorized and approved on a final basis in connection with this Final Fee Application after giving credit for amounts previously paid in connection with the Monthly Fee Statements and the Interim Fee Application; and (iv) final allowance and approval of compensation for the actual, reasonable, and necessary professional services to be rendered as bankruptcy counsel for the Debtors in these Chapter 11 Cases during period of June 4, 2025 through June 16, 2025 in accordance with the Extended Wind Down Budget and Second Cash Collateral Stipulation;.

21. The Application is supported by the following Exhibits:

- a. **Exhibit B** contains a summary schedule of the time expended by all Raines professionals engaged in the representation of the Debtors during the Final Application Period.
- b. **Exhibit C** contains a summary schedule of hours and fees covered by this Application, categorized by project code.
- c. **Exhibit D** contains: (i) the Monthly Fee Statements for January through April, 2025; (ii) the Interim Fee Application; and (iii) the invoices for services rendered from May 1, 2025 through June 3, 2025, including a detailed itemization of the service hours expended by matter and professional and a summary schedule of hours and fees categorized by project code and a detailed chronological itemization of the services rendered by each professional and paraprofessional, calculated by tenths of an hour and categorized in accordance with the appropriate project code.
- d. **Exhibit E** contains a disclosure of “customary and comparable compensation” charged by Raines’ professionals. As set forth in ¶ C.3 of the Appendix B Guidelines, Exhibit E provides a summary of the blended hourly rates of the timekeepers (segregated by rank) included in this Application compared to the blended hourly rates charged by similar non-bankruptcy timekeepers at Raines.

**SUMMARY OF PROFESSIONAL COMPENSATION AND
REIMBURSEMENT OF EXPENSES REQUESTED**

22. During the Final Application Period, Raines, by and through its professionals and paraprofessionals, has performed all necessary professional services which are described and narrated in detail below and set forth in Raines’ Invoices.

23. Raines has not entered into any agreement, express or implied, with any other party for the purpose of fixing or sharing fees or other compensation to be paid for professional services rendered in this case. No promises have been received by Raines as to compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code.

24. Raines is a disinterested party and does not represent or hold an interest adverse to the interests of the Debtors' estates on the matters for which it was retained.

25. The fees charged by Raines are billed in accordance with its existing billing rates and procedures in effect during the Final Application Period. The rates Raines charges for services rendered by its professionals and paraprofessionals for this engagement are no greater than the rates that Raines charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market.

26. The Invoices that chronologically list the time (broken down by tenths of an hour) and services rendered by Raines for each of the categories of activities during the Final Application Period, which are attached hereto as Exhibit D.

SUMMARY OF SERVICES

27. At the commencement of Raines' engagement, Raines created different subject matter categories to which its professionals billed their time on behalf of the Debtors. Below is a brief description of each of the matters for which Raines professionals billed time or incurred expenses on behalf of the Debtors during the Final Application Period. Also included is the aggregate amount of fees incurred for each subject matter category. The summary of services set

forth in the following paragraphs is a supplement to the summary of services discussed in detail in Raines' Interim Fee Application.

A. B110 - Case Administration

28. Time billed by Raines under this task code includes time devoted to the efficient and expeditious administration of these Chapter 11 Cases. Work performed under this category includes: (a) development of case strategies and (b) general case administration, including responding to inquiries from the United States Trustee, the Court, the Clerk for the United States Bankruptcy Court for the Western District of Pennsylvania, the Committee, and creditors of the Debtors.

Total Hours	Total Fees
304.7	\$208,432.50

B. B120 – Asset Analysis and Recovery

29. Time billed by Raines under this task code includes research and analysis of the Debtors' assets.

Total Hours	Total Fees
128.39	\$91,190.50

C. B130 – Asset Disposition

30. Time billed by Raines under this task code includes the reasonable fees incurred in assisting and advising the Debtors in connection with three sales of substantially all assets of the Debtors. These transaction were approved upon entry of three separate Sale Orders and closed on April 4, 2025. Raines has served as the Debtors' counsel with respect to all negotiations, auctions, and hearings relating to all three sales and worked with all buyers on their respective Sale Orders.

Raines also worked collaboratively with all parties on negotiation and completing all sale documents necessary to complete the closing on the sales pursuant to the Sale Order.

Total Hours	Total Fees
822.6	\$606,885.50

D. B140 – Relief From Stay / Adequate Protection

31. Time billed by Raines under this task code related to the reasonable fees incurred in connection with research and discussions pertaining to motions to enforce automatic stay.

Total Hours	Total Fees
1.5	\$1,212.50

E. B150 – Meetings and Communications with Creditors

32. Time billed by Raines under this task code relates to the reasonable fees incurred for meetings and communications with creditors and all research and strategic discussions pertaining to same.

Total Hours	Total Fees
32.6	\$23,96.50

F. B160 – Fee Applications and Objections to Fee Applications

33. Time billed by Raines under this task code includes the reasonable fees incurred for preparing and filing its Monthly Fee Statements, Interim Fee Application, and this Final Fee Application, and other of the Debtors' professionals Monthly Fee Statements and fee applications, including review and analysis of proforma invoices, incorporating adjustments based on the time

and complexity of the issues involved, and the preparation of supporting documentation for submission to the Court. The fees related with this category also include fees incurred relating to the review and analysis of all fee statements filed in these Chapter 11 Cases and correspondence regarding the same

Total Hours	Total Fees
45.4	\$23,728.00

G. B170 – Employment Applications and Objections

34. Time billed by Raines under this task code includes the reasonable fees incurred in connection with the preparation of Raines’ employment application and other of the Debtors’ professionals’ employment applications. This includes review and analysis of conflict reports and correspondence with the United States Trustee to address questions and concerns regarding the same, as well as revisions to proposed orders pertaining to same.

Total Hours	Total Fees
56.1	\$34,563.50

H. B185 – Assumption / Rejection of Leases

35. Time billed by Raines under this task code includes the reasonable fees incurred in connection with the preparation of notices of contract assumption and assignment including review and analysis of contract objections and negotiations and communications with objecting parties. This category also includes matters relating to the Debtors’ multiple omnibus motions to reject executory contracts and unexpired leases

Total Hours	Total Fees
114.2	\$70,599.50

I. B190 – Other Contested Matters and Omnibus Hearings

36. Time billed by Raines under this task code includes the reasonable fees incurred by Raines in connection with miscellaneous hearings and other contested matters filed in these Chapter 11 Cases. The fees incurred includes the reasonable time necessary for review and analysis of, and preparation for, contested matters filed in these chapter 11 Cases, including assisting in the preparation of Debtors’ responses to the same, as necessary, and attendance at related hearings. This category also includes the time incurred in connection with the resolution of numerous matters involving the Pennsylvania Department of Environmental Protection

Total Hours	Total Fees
528.3	\$332,537.50

J. B200 – Adversary Actions

Time billed by Raines under this task code includes the reasonable fees incurred in connection with the reviewing and analyzing a pending litigation matter and analyzing bond issues and was inadvertently billed to the B200 task code.

Total Hours	Total Fees
6.7	\$4,894.00

K. B205 – State Court Matters

37. Time billed by Raines under this task code includes the reasonable fees incurred in connection with state court matters. This includes correspondence with opposing counsel regarding pending state court matters and preparing and filing suggestions of bankruptcy for various ongoing actions. This also includes time spent researching matters relating to mechanics' liens and corresponding with opposing counsel regarding the same.

Total Hours	Total Fees
11.3	\$7,132.00

L. B210 – Business Operations

38. Time billed by Raines under this task code includes the reasonable fees incurred in connection with the Debtors' business operations. This includes review and analysis of various concerns pertaining to the Debtors' ongoing business and correspondence with parties regarding same.

Total Hours	Total Fees
279.9	\$207,831.50

M. B220 – Employee Benefits/ Pensions

Time billed by Raines under this task code includes the reasonable fees incurred in connection with coordinating employee matters with the client, time spent researching and drafting the Debtors' WARN notice, and multiple communications and conferences with state and local officials regarding employee matters.

Total Hours	Total Fees
40.5	\$28,296.00

N. B230 – Financing / Cash Collateral

39. Time billed by Raines under this task code includes the reasonable fees incurred in connection with the Debtors' post-petition financing. This includes review and analysis the proposed financing terms, correspondence and meetings with various professionals to negotiate consensual orders, and preparation for and attendance at hearings pertaining to same. This category also includes significant time dedicated to resolving issues with KeyBank in order to allow the Debtors' continued use of cash collateral on a consensual basis, as ultimately memorialized in the Second Case Collateral Stipulation and Extended Wind Down Budget.

Total Hours	Total Fees
68.1	\$50,548.00

O. B235 – Financial Filings

40. Time billed by Raines under this task code includes the reasonable fees incurred in connection with reviewing, analyzing, and preparing the Debtors' schedules of assets, liabilities, statements of financial affairs and monthly operating reports.

Total Hours	Total Fees
12.9	\$10,635.50

P. B240 – Tax Issues

41. Time billed by Raines under this task code includes the reasonable fees incurred in connection with discussions between Debtors' counsel and Debtors' professionals relating to an analysis of the Debtors' net operating losses in connection with a plan of reorganization.

Total Hours	Total Fees
5.2	\$3,816.50

Q. B250 – Real Estate

Time billed by Raines under this task code includes the reasonable fees incurred in connection with analysis of lease, permitting and bond issues.

Total Hours	Total Fees
3.2	\$2,493.50

R. B260 – Board of Directors Matters

Time billed by Raines under this task code includes the reasonable fees incurred in connection with attending Board of Director meetings.

Total Hours	Total Fees
9.4	\$2,493.50

S. B310 – Claims Administration and Objections

42. Time billed by Raines under this task code includes the reasonable fees incurred in connection with analyzing, discussing, and negotiating with respect to potential and asserted

claims against the Debtors' estates, including tort claims, contract claims and environmental obligations.

Total Hours	Total Fees
143.4	\$114,360.00

T. B320 – Plan and Disclosure Statement

43. Time billed by Raines under this task code include the reasonable fees incurred in connection with the Debtors strategic option to file a plan of reorganization. Prior to the sale of substantially all the Debtors' assets, the Debtors were exploring dual pathways including consideration and analysis of a potential plan of reorganization.

Total Hours	Total Fees
47.1	\$34,433.50

U. B410 – Restructuring

44. Similar to time billed under task code B320, time billed by Raines under this task code include the reasonable fees incurred in connection with the Debtors strategic option to file a plan of reorganization. This time was originally billed to the B410 task code but may be more appropriately categorized under task code B320.

Total Hours	Total Fees
1.1	\$946.00

REQUEST FOR EXPEDITED CONSIDERATION

45. The Debtors respectfully request that this Court schedule an expedited hearing to consider the relief requested in this Application. Attached hereto as **Exhibit G** is a proposed expedited scheduling order.

46. The Debtors submit that, as more fully set forth herein, just cause exists to expedite the hearing on this Application because (i) the Debtors have filed a motion seeking dismissal of these Chapter 11 Cases which is scheduled to be heard on June 16, 2025 and (ii) the Debtors have limited consensual use of cash collateral pursuant to the Second Cash Collateral. Accordingly, the Debtors have neither sufficient time nor resources that would allow for the scheduling of this Application on the next available omnibus hearing date, as these Chapter 11 Cases may be dismissed prior to the hearing on this Application and, if not, the Debtors would have no resources to prepare for and attend a hearing on this Application.³

47. The Debtors submit that the need for an expedited hearing has not been caused by any fault of the Debtors or their professionals but has been brought about solely by circumstances outside of their control.

48. Accordingly, the Debtors respectfully request the Court hear the Application on June 16, 2025 alongside the Motion to Dismiss.

CONCLUSION

49. The foregoing professional services performed by Raines were necessary and appropriate with respect to its representation of the Debtors in these Chapter 11 Cases.

³ The Debtors have timely submitted monthly fee statements and an interim fee application in accordance with the Interim Compensation Procedures Order, none of which received any objection by any party in interest.

Compensation for the foregoing services as requested is commensurate with the complexity, importance, and skill required to address the problems, issues, and/or tasks involved.

[signature page to follow]

WHEREFORE, Raines respectfully requests that this Court enter an Order, substantially in the form attached hereto as **Exhibit F**: (i) granting final allowance and approval of compensation for professional services rendered to the Debtors during the Final Application Period in the total amount of \$1,866,000.50; (ii) granting final allowance and approval of all expenses billed during the Final Application Period in the amount of \$41,443.27; (iii) authorizing and directing the Debtors to pay Raines the amount of \$278,306.55, representing the total compensation and reimbursement of expenses authorized and approved on a final basis in connection with this Final Fee Application after giving credit for amounts previously paid in connection with the Monthly Fee Statements and the Interim Fee Application; (iv) granting final allowance and approval of compensation for the actual, reasonable, and necessary professional services to be rendered as bankruptcy counsel for the Debtors in these Chapter 11 Cases during period of June 4, 2025 through June 16, 2025 in accordance with the Extended Wind Down Budget and Second Cash Collateral Stipulation; and (v) granting such other and further relief as may be just and proper.

Respectfully submitted,

Dated: June 4, 2025

RAINES FELDMAN LITRELL, LLP

By: /s/ Michael J. Roeschenthaler
Michael J. Roeschenthaler (PA ID No. 87647)
Mark A. Lindsay (PA ID No. 89487)
Daniel R. Schimizzi (PA ID No. 311869)
11 Stanwix Street, Suite 1100
Pittsburgh, PA 15222
Telephone: 412-899-6462
Email: mroeschenthaler@raineslaw.com
mlindsay@raineslaw.com
dschimizzi@raineslaw.com

Counsel to the Debtors and Debtors in Possession

Exhibit A

Retention Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related to Document No.: 137
v.	Hearing Date: January 28, 2025
NO RESPONDENT.	Hearing Time: 10:00 AM (EST)
	Response Deadline: 12:00 PM (EST)
	January 27, 2025

**ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF RAINES
FELDMAN LITRELL LLP AS COUNSEL FOR THE DEBTORS
NUNC PRO TUNC TO THE PETITION DATE**

Upon the amended application (the “Application”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for the entry of an order (this “Order”) authorizing the Debtors to retain and employ Raines Feldman Littrell LLP (“Raines”) as counsel *effective nunc pro tunc* to the Petition Date, pursuant to sections 327(a) and 330 of title 11 of the United States Code (as amended, the “Bankruptcy Code”), Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-l of the Local Rules for

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holding, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Application.

the Western District of Pennsylvania (the “Local Rules”); and the Court being satisfied based on the representations made in the Application and in the Roeschenthaler Declaration that Raines represents no interest adverse to the Debtors’ estates with respect to the matters upon which they are to be engaged, that they are disinterested persons as that term is defined under section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, and that their employment is necessary and in the best interests of the Debtors’ estates; the terms set forth in the Application are reasonable terms for the purposes of section 328(a) of the Bankruptcy Code; and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided; and it appearing that no other or further notice need be provided; and after due deliberation and sufficient cause appearing therefore, it is hereby ordered that:

1. The Application is **GRANTED** as provided herein.
2. In accordance with sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rule 2016-1, the Debtors are authorized to employ and retain Raines as Counsel to the Debtors on the terms set forth in the Application as modified by this Order.
3. Raines shall be compensated in accordance with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, this Order and any other applicable orders of this Court.
4. Raines shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Debtors’ chapter 11 cases in compliance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other

applicable procedures and orders of the Court. Raines also shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under United States Code by Attorneys in Larger Chapter 11 Cases, both in connection with the Application and the interim and final fee applications to be filed by Raines in these chapter 11 cases.

5. At least ten (10) business days prior to applying any increases in its hourly rates beyond the rates set forth in the Application, Raines shall file with the Court a notice of such increases and serve such notice on the master service list. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in Section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

6. Notwithstanding anything in the Application or this Order to the contrary, Raines shall apply any remaining amounts of any advance payment retainer(s) as of the Petition Date toward postpetition fees and expenses, after postpetition fees and expenses are approved pursuant to an order of Court.

7. The Debtors and Raines are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Application.

8. Notice of the Application as provided therein is deemed to be good and sufficient notice of such Application, and the requirements of the Local Rules are satisfied by the contents of the Application.

9. To the extent the Application or the Roesenthaler Declaration are inconsistent with this Order, the terms of this Order shall govern.

10. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

11. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Prepared by:

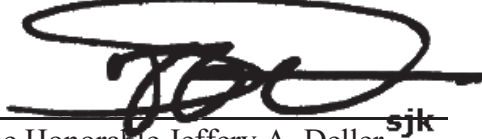
/s/Michael J. Roeschenthaler

Michael J. Roeschenthaler, Proposed Counsel to the Debtors

Date: January 28, 2025

Pittsburgh, PA

BY THE COURT:


The Honorable Jeffery A. Deller ^{sjk}
United States Bankruptcy Judge

FILED
1/28/25 2:52 pm
CLERK
U.S. BANKRUPTCY
COURT - WDPA

Notice Recipients

District/Off: 0315-7	User: auto	Date Created: 1/28/2025
Case: 25-70001-JAD	Form ID: pdf900	Total: 4

Recipients of Notice of Electronic Filing:

aty	Daniel R. Schimizzi	dschimizzi@raineslaw.com
aty	Mark A. Lindsay	mlindsay@raineslaw.com
aty	Michael J. Roeschenthaler	mroeschenthaler@raineslaw.com
aty	Sarah Elizabeth Wenrich	swenrich@raineslaw.com

TOTAL: 4

Exhibit B

Summary Schedule of Time by Professional

COMPENSATION BY PROFESSIONAL

The attorneys who rendered professional services in these Chapter 11 Cases during the Final Application Period are:

NAME OF PROFESSIONAL	POSITION	DEPT.	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Michael J. Roeschenthaler	Partner	Bankruptcy	2001	\$860.00	432.6	\$372,036.00
Kenneth J. Lund	Partner	Bankruptcy	1991	\$875.00	137.5	\$120,312.50
Eric Blum	Partner	Corporate	1998	\$845.00	46.8	\$39,546.00
Gregg B. Shulklapper	Partner	Corporate	1993	\$925.00	0.8	\$740.00
Keith E. Whitson	Partner	Bankruptcy	1993	\$910.00	1.6	\$1,456.00
Daniel R. Schimizzi	Partner	Bankruptcy	2011	\$615.00	298	\$183,270.00
Mark Melickian	Partner	Bankruptcy	1995	\$865.00	2.1	\$1,816.50
Matthew Schiff	Partner	Labor & Employment	1982	\$720.00	14.7	\$10,584.00
Scott Hare	Partner	Litigation	1991	\$920.00	1.1	\$1,012.00
Ronald W. Crouch	Counsel	Bankruptcy	1981	\$825.00	90.7	\$74,827.50
Harry A. Readshaw	Counsel	Bankruptcy	2006	\$665.00	63.3	\$42,094.50

Mark A. Lindsay	Counsel	Bankruptcy	2002	\$780.00	749.7	\$584,766.00
Tina Roeschenthaler	Counsel	Bankruptcy	2001	\$670.00	138	\$92,460.00
Sarah E. Wenrich	Associate	Bankruptcy	2018	\$575.00	177.8	\$102,235.00
Jordan N. Kelly	Associate	Bankruptcy	2020	\$485.00	426.9	\$206,561.50
Jesse D. Nelms	Associate	Litigation	2024	\$425.00	56.7	\$24,097.50
Total for Attorneys:					2,638.3	\$1,857,815.00

The paraprofessionals and other staff who rendered professional services in these Chapter 11 Cases during the Final Application Period are:

NAME OF PARAPROFESSIONAL OR STAFF MEMBER	POSITION	DEPT.	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Lela M. Lescalette	Paralegal	Bankruptcy	\$375.00	14.3	\$3,675.00
Michael Sally	Paralegal	Bankruptcy	\$465.00	9.7	\$4,510.50
Total Paraprofessionals for and Other Staff:					\$8,185.50

Exhibit C

Summary Schedule of Time by Task Code

COMPENSATION BY PROJECT CATEGORY

NO.	PROJECT CATEGORY	TOTAL HOURS BILLED	TOTAL COMPENSATION
B110	Case Administration	304.7	\$208,432.50
B120	Asset Analysis and Recovery	128.3	\$91,190.50
B130	Asset Disposition	822.6	\$606,885.50
B140	Relief from Stay / Adequate Protection	1.5	\$1,212.50
B150	Meetings and Communications with Creditors	32.6	\$23,963.50
B160	Fee Applications and Objections to Fee Applications	45.4	\$23,728.00
B170	Employment Applications and Objections	56.1	\$34,563.50
B185	Assumption / Rejection of Leases	114.2	\$70,599.50
B190	Other Contested Matters and Omnibus Hearings	528.3	\$332,537.50
B200	Adversary Actions	6.7	\$4,894.00
B205	State Court Matters	11.3	\$7,132.00
B210	Business Operations	279.9	\$207,831.50
B220	Employee Benefits	40.5	\$28,296.00
B230	Financing/ Cash Collateral	68.1	\$50,548.00
B235	Financial Filings	12.9	\$10,635.50
B240	Tax Issues	5.2	\$3,816.50
B250	Real Estate	3.2	\$2,493.50
B260	Board of Directors Matters	9.4	\$6,761.00
B310	Claims Administration and Objections	143.4	\$114,360.00
B320	Plan and Disclosure Statement	47.1	\$34,433.50
B410	Restructuring	1.1	\$946.00
E124	*Time accidently billed as an expense.	0.8	\$740.00
	TOTAL:	2,662.3	\$1,866,000.50
	Less Amounts Paid Pursuant to Interim Compensation Order and Fee Statements		\$1,589,443.50
	Total Fees Requested		\$276,557.00

Exhibit D

Invoices

**Monthly Fee Statement of Raines Feldman Littrell, LLP for
the Period of January 6, 2025 through January 31, 2025**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
	Doc. No.:
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Related to Document No.:
Movant,	Hearing Date: March 27, 2025
v.	Hearing Time: 11:00 AM
NO RESPONDENT.	Response Deadline: February 26, 2025 at 4:00 p.m. EST

**MONTHLY FEE STATEMENT OF RAINES FELDMAN LITTRELL, LLP, FOR THE
PERIOD FROM JANUARY 6, 2025, THROUGH JANUARY 31, 2025**

Name of applicant: Raines Feldman Littrell, LLP

Authorized to provide professional services to: The Debtors

Petition Date: January 6, 2025

Date of Retention: January 28, 2025, effective as of January 6, 2025, *see* Doc. No. 192

This is a: Monthly Fee Statement

Period for which compensation and reimbursement are sought:
January 6, 2025, through January 31, 2025

Amount of compensation sought as actual, reasonable, and necessary:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors' address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

\$430,937.60 (representing 80% of the total fees of \$538,672.00).

Amount of expense reimbursement sought as actual, reasonable, and necessary:

\$20,055.87

Blended hourly rate for this fee statement: \$687.43

SUMMARY OF PRIOR MONTHLY FEE APPLICATIONS

DATE FILED	PERIOD COVERED	REQUESTED		UNOPPOSED		PAID		HOLDBACK FEES
		FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES	
N/A								
	Totals:							

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

DATE FILED	PERIOD COVERED	ORDER ENTERED	REQUESTED		ALLOWED		PAID	
			FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES
N/A								
		Totals:						

COMPENSATION BY PROFESSIONAL

The attorneys who rendered professional services in these Chapter 11 Cases from January 6, 2025, through January 31, 2024 (the “Fee Period”), are:

NAME OF PROFESSIONAL	POSITION	DEPT.	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Michael J. Roeschenthaler	Partner	Bankruptcy	2001	\$860.00	137.4	\$118,164.00
Kenneth J. Lund	Partner	Bankruptcy	1991	\$875.00	81.2	\$71,050.00
Gregg B. Shulklapper	Partner	Corporate	1993	\$925.00	0.8	\$740.00
Daniel R. Schimizzi	Partner	Bankruptcy	2011	\$615.00	97.0	\$59,655.00
Keith E. Whitson	Partner	Bankruptcy	1993	\$910.00	1.6	\$1,456.00
Mark A. Lindsay	Counsel	Bankruptcy	2002	\$780.00	127.1	\$99,138.00
Harry A. Readshaw	Counsel	Bankruptcy	2006	\$665.00	41.2	\$27,398.00
Tina A. Roeschenthaler	Counsel	Bankruptcy	2001	\$670.00	53.9	\$36,113.00
Sarah E. Wenrich	Associate	Bankruptcy	2018	\$575.00	107.5	\$61,812.50
Jordan N. Kelly	Associate	Bankruptcy	2020	\$485.00	91.8	\$44,523.00
Jesse D. Nelms	Associate	Bankruptcy	2024	\$425.00	41.7	\$17,722.50
Total for Attorneys:					783.60	\$538,672.00

The paraprofessionals and other staff who rendered professional services in these Chapter 11 Cases during the Fee Period are:

NAME OF PARAPROFESSIONAL OR STAFF MEMBER	POSITION	DEPT.	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Lela M. Lescallette	Paralegal	Bankruptcy	\$375.00	2.4	\$900.00
Total for Paraprofessionals and Other Staff:					\$

COMPENSATION BY PROFESSIONAL CATEGORY

PROFESSIONALS	BLENDED RATE	TOTAL HOURS	TOTAL COMPENSATION
Partners	\$789.51	318.0	\$251,065.00
Counsel	\$731.99	222.2	\$162,649.00
Associates	\$514.76	241.0	\$124,058.00
Paraprofessionals	\$375.00	2.4	\$900.00
Blended Hourly Rate/Total Fees	\$687.43	783.6	\$538,672.00
Less 20% Holdback			\$107,734.40
Total Adjusted Fees Requested			\$430,937.60

COMPENSATION BY PROJECT CATEGORY FOR WORK

NO.	PROJECT CATEGORY	TOTAL HOURS BILLED	TOTAL COMPENSATION
B110	Case Administration	167.5	\$129,873.50
B120	Asset Analysis and Recovery	16.1	\$9,406.00
B130	Asset Disposition	151.9	\$111,836.50
B150	Meetings and Communications with Creditors	13.4	\$10,429.50
B170	Employment Applications and Objections	37.5	\$23,354.50
B185	Assumption / Rejection of Leases and Contracts	55.5	\$34,074.50
B190	Other Contested Matters and Omnibus Hearings	227.60	\$148,372.00
B200	Adversary Actions	1.6	\$1,456.00
B205	State Court Matters	1.0	\$655.00
B210	Business Operations	44.4	\$34,461.50
B220	Employee Benefits / Pensions	0.2	\$172.00
B230	Financing/Cash Collateral	29.9	\$22,069.50
B235	Financial Filings	10.5	\$9,187.50
B240	Tax Issues	2.9	\$2,494.00
B250	Real Estate	3.2	\$2,493.50

B260	Board of Directors Matters	1.7	\$1,462.00
B310	Claim Administration and Objections	14.50	\$11,372.50
B320	Plan and Disclosure Statement	3.4	\$2,924.00
B410	Restructuring	1.1	\$946.00
	TOTAL:		\$538,672.00

ITEMIZED EXPENSES

EXPENSE DESCRIPTION	DATE	EXPENSE AMOUNT
Western District of Pennsylvania Bankruptcy Court: Filing fees for Chapter 11 Cases	01/06/2025	\$19,118.00
FedEx: Delivery of First Day Binder to Hawaii	01/13/2025	\$242.47
Postage	01/17/2025	\$2.50
Western District of Pennsylvania Bankruptcy Court: Certified Copy of Court Order	01/26/2025	\$14.00
Western District of Pennsylvania Bankruptcy Court: Filing Fee for Sale Motion	01/26/2025	\$199.00
Pennsylvania Bureau of Corporations and Charitable Organizations: Fees for UCC / Lien Searches	01/26/2025	\$357.00
Genoa Pizza: Lunch for attorneys and client following First Day Hearing	01/26/2025	\$122.90
TOTAL:		\$20,055.87

Pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, rule 2016 of the Federal Rules of Bankruptcy Procedure, rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Western District of Pennsylvania, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [Doc. No. 164] (the “Interim Compensation Order”), Raines Feldman Littrell, LLP (“Raines”), counsel for Debtors, hereby files this monthly fee statement relating to compensation for professional services rendered to the Debtors and for reimbursement of actual and necessary expenses incurred in connection therewith for the period commencing January 6 2025, through and including January 31, 2025 (the “Fee Period”), and requests authorization, in accordance with the Interim Compensation Order, to be paid by the Debtors in the aggregate amount of \$450,993.47, representing 80% of the total amount of fees of \$538,672.00 and 100% of the expenses of \$20,055.87 incurred during the Fee Period. Copies of Raines’ itemized time records for professionals and paraprofessionals performing services for the Debtors during the Fee Period are attached hereto as **Exhibit A**.

Respectfully submitted,

Dated: February 12, 2025

RAINES FELDMAN LITRELL, LLP

By: /s/ Michael J. Roeschenthaler

Michael J. Roeschenthaler (PA ID No. 87647)

Kenneth J. Lund (PA ID No. 63468)

Mark A. Lindsay (PA ID No. 89487)

Daniel R. Schimizzi (PA ID No. 311869)

11 Stanwix Street, Suite 1100

Pittsburgh, PA 15222

Telephone: 412-899-6462

Email: mroeschenthaler@raineslaw.com

klund@raineslaw.com

mlindsay@raineslaw.com

dschimizzi@raineslaw.com

Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Itemized Time Records by Project Category

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related to Document No.: 229
v.	Hearing Date: March 27, 2025
NO RESPONDENT.	Hearing Time: 11:00 AM
	Response Deadline: February 26, 2025 at 4:00 p.m. EST

**NOTICE OF MONTHLY FEE STATEMENT OF RAINES FELDMAN LITTRELL, LLP,
FOR THE PERIOD FROM JANUARY 6, 2025, THROUGH JANUARY 31, 2025**

PLEASE TAKE NOTICE that, on February 12, 2025, Raines Feldman Littrell, LLP (the “Applicant”), filed the attached *Monthly Fee Statement of Raines Feldman Littrell, LLP, for the Period From January 6, 2025 through January 31, 2025* [Doc. No. 229] (the “Statement”), with the United States Bankruptcy Court for the Western District of Pennsylvania (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Statement must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [Doc. No. 164] (the “Interim Compensation Order”), filed with the Clerk of the Bankruptcy Court, and served upon: (i) financial advisor to the Debtors, BDO Consulting Group, LLC, 200 Park Avenue, 38th Floor, New York, NY 10166, Attn: Evan Blum (ebblum@bdo-ba.com); (ii) counsel to the Debtors, Raines Feldman Littrell, LLP, 11 Stanwix St., Suite 1100, Pittsburgh, PA 15222, Attn: Michael J. Roeschenthaler (mroeschenthaler@raineslaw.com) and Mark A. Lindsay (mlindsay@raineslaw.com); (iii) proposed counsel to the official committee of unsecured creditors, Dentons Bingham Greenebaum LLP, 3500 PNC Tower, 101 S. Fifth Street, Louisville, KY 40202, Attn: James R. Irving

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

(james.irving@dentons.com) and Thomas D. Maxson (thomas.maxson@dentons.com); (iv) counsel to KIA II, LLC, Tucker Arensberg, P.C., 1500 One PPG Place, Pittsburgh, PA 15222, Attn: Michael A. Shiner (mshiner@tuckerlaw.com); and (v) the Office of the United States Trustee for the Western District of Pennsylvania, Federal Building, 1000 Liberty Avenue, Suite 1316, Pittsburgh, PA 15222, Attn: Kate M. Bradley (kate.m.bradley@usdoj.gov), William M. Buchanan (William.buchanan@usdoj.gov), and Jodi L. Hause (jodi.hause@usdoj.gov). (collectively, the “Notice Parties”), on or before **4:00 PM (EST) on February 26, 2025** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that, if no objections to the Statement are filed, served, and received prior to the Objection Deadline, the Applicant may file a certification of no objection with the Bankruptcy Court, after which the Debtors shall be authorized by the Interim Compensation Order to pay the Applicant an amount equal to 80% of the fees and 100% of the expenses requested in the Statement without the need for further order of the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that, if an objection to the Statement is filed, served, and received prior to the Objection Deadline, the applicable Debtors shall be authorized by the Interim Compensation Order to pay the Applicant 80% of the fees and 100% of the expenses requested in the Statement not subject to such objection without the need for further order of the Bankruptcy Court.

Respectfully submitted,

Dated: February 12, 2025

RAINES FELDMAN LITRELL, LLP

By: /s/ Michael J. Roeschenthaler

Michael J. Roeschenthaler (PA ID No. 87647)

Kenneth J. Lund (PA ID No. 63468)

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Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Itemized Time Records by Project Category



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

Invoice Date: 2/12/2025
Invoice Number: 0

Corsa Coal, Corp. et al
Kevin M. Harrigan, President and CEO
1576 Storystown Road
PO Box 260
Friedens, PA 15541

8227-002 / Corsa Bankruptcy

Professional Services				Hours	Rate	Amount
01/06/2025	DXS	B110	Continue review and analysis of, and additional revisions to, first day motions (4.6); conferences with Raines' team regarding status of filings and first day motions (1.4); attention to review of and revisions to petitions and related filings (.7)	6.70	615.00	4,120.50
01/06/2025	HAR	B110	Attention to first day motions and exhibits/notices for same	4.30	665.00	2,859.50
01/06/2025	HAR	B110	Attention and follow up re first day motions and related evidentiary issues	2.70	665.00	1,795.50
01/06/2025	JDN	B110	Research and analysis in connection with hearings on first day motions	3.30	425.00	1,402.50
01/06/2025	JDN	B110	Editing and of first day motions and pull related authority	2.90	425.00	1,232.50
01/06/2025	JDN	B110	Researching county taxing authorities (re: parties to notice)	0.50	425.00	212.50
01/06/2025	JDN	B110	Printing and binding documents for court review (re: first day motions binder)	1.30	425.00	552.50
01/06/2025	KJL	B110	Research relating to potential buyers for contemplated sale process and related calls and communications	4.30	875.00	3,762.50
01/06/2025	KJL	B110	Participate in calls and communications with RFL team and client relating to first days, upcoming hearings and sale process	1.60	875.00	1,400.00
01/06/2025	KJL	B110	Confer regarding Main Street Lending Program authorization legislation	0.40	875.00	350.00
01/06/2025	MAL	B110	Work on finalizing first days and first day hearing prep and analysis of options relating to KeyBank	6.40	780.00	4,992.00

01/06/2025	MJR	B110	Hearing preparation and related calls with client, RFL team members and DIP lender counsel (10.3); attention to DIP Order and Motion (.6); correspond and call lenders (1.1)	12.00	860.00	10,320.00
01/06/2025	SEW	B110	Analysis of loan documents and Main Street Lending program and potential options (3.6); correspond with RFL team re same (0.3)	3.90	575.00	2,242.50
01/06/2025	SEW	B110	Additional correspondence with internal team regarding first day motions and related information	0.60	575.00	345.00
01/06/2025	SEW	B110	Attention to evidentiary issues relating to first days and related follow up	1.30	575.00	747.50
01/06/2025	SEW	B110	Revise DIP Motion in accordance with updated first day declaration and internal emails pertaining to first day motions	0.70	575.00	402.50
01/06/2025	SEW	B110	Review updated draft of Interim DIP Order and continue revisions to DIP motion accordingly; pull authority in first days	2.50	575.00	1,437.50
01/06/2025	TAR	B110	Pull documents needed for hearing and conduct related research (3.7); correspond with RFL team re same (.5)	4.20	670.00	2,814.00
01/06/2025	TAR	B110	Assist M. Roeschenthaler with hearing preparation	0.80	670.00	536.00
01/06/2025	TAR	B110	Correspondence with M. Lindsay regarding first days and related follow up	1.10	670.00	737.00
01/06/2025	TAR	B110	Research issues relating to various lease claims	1.20	670.00	804.00
01/07/2025	KJL	B110	Attention to issues relating to First Day Declaration and confer with J. Kelly regarding evidentiary standards (.7); analysis of revisions to Interim DIP Order (.4); research re operational issues and meet with M. Roeschenthaler and witness with regard to same (1.8)	2.90	875.00	2,537.50
01/07/2025	LL	B110	Review docket (0.1); prepare hearing binder for delivery to judge's chambers (0.4); prepare hearing binders for attorneys (0.4)	0.90	375.00	337.50
01/07/2025	MAL	B110	Review and respond to various questions and objections regarding first day pleadings and revise multiple first day orders.	4.50	780.00	3,510.00
01/07/2025	MJR	B110	Calls and correspondence with client and board about case issues, upcoming filings, claims issues, and the first day hearings	3.70	860.00	3,182.00
01/08/2025	HAR	B110	Analyze service requirements for NOL interim order and research regarding service parties and addresses	0.90	665.00	598.50

01/09/2025	HAR	B110	Prepare final notices for regarding Equity Transfer Procedures (1.4); Communications with Canadian Counsel to confirm addresses for Canadian service parties (.4); Finalize list of additional service parties and discussions with Omni regarding same (1.0)	2.80	665.00	1,862.00
01/09/2025	JDN	B110	Review of additional filings	2.60	425.00	1,105.00
01/09/2025	JDN	B110	Meeting with Raines Corsa team to discuss timelines, strategy, next steps, motions, etc.	0.90	425.00	382.50
01/09/2025	KJL	B110	Confer with M. Roeschenthaler and RFL team regarding preparation of post-First Day pleadings and case strategy (.8); secure access and commence analysis of documentation in data room (.4)	1.20	875.00	1,050.00
01/09/2025	MAL	B110	Review Canadian proceeding draft filings and various discussions and emails with Canadian counsel regarding same.	1.50	780.00	1,170.00
01/09/2025	MAL	B110	Various calls and meetings with financial advisor regarding financial issues and case strategy.	2.00	780.00	1,560.00
01/09/2025	MJR	B110	Attention to client inquiries and creditor issues	1.30	860.00	1,118.00
01/09/2025	MJR	B110	Call with Canadian counsel	0.20	860.00	172.00
01/09/2025	SEW	B110	Review foreign representative order and confer with L. Lescalette regarding process for obtaining certified copied of same for Canadian proceedings	0.20	575.00	115.00
01/10/2025	JDN	B110	Drafting and editing BDO Retention application and related tasks	3.70	425.00	1,572.50
01/10/2025	JDN	B110	Research and relating to automatic stay issues and potential violations of the same	4.10	425.00	1,742.50
01/10/2025	KJL	B110	Attention to email communications regarding incident at Acosta mine and call with safety director regarding same; participate in MSHA interviews of company employees	3.70	875.00	3,237.50
01/10/2025	MJR	B110	Calls and correspondence with client	0.40	860.00	344.00
01/10/2025	MJR	B110	Attention to client inquiries and operational issues and discuss same with K. Lund	2.10	860.00	1,806.00
01/10/2025	MJR	B110	Attention to claims issues and operational issues (1.1); correspond with consultation parties (0.2)	1.30	860.00	1,118.00
01/11/2025	JDN	B110	Research and draft potential bankruptcy suggestion notices (re: litigation issues)	1.30	425.00	552.50
01/13/2025	JDN	B110	Suggestion of Bankruptcy notices - drafting and filing.	1.00	425.00	425.00
01/13/2025	JNK	B110	Communications with BDO and Omni re SOFA's and Schedules	0.40	485.00	194.00
01/13/2025	MJR	B110	Status call with BDO	0.40	860.00	344.00

01/14/2025	DXS	B110	Review information provided in response to IDI request letter, prepare sharefile, and circulate to UST in advance of IDI	0.70	615.00	430.50
01/14/2025	KJL	B110	Attend presentation of Application for Recognition Proceedings under Part IV of Canadian Companies' Creditors Arrangement Act (.5); review pleadings filed for same (.4)	0.90	875.00	787.50
01/14/2025	LL	B110	Review docket and calendar upcoming hearings	0.10	375.00	37.50
01/14/2025	LL	B110	Contract management	0.30	375.00	112.50
01/15/2025	SEW	B110	Attention to emails regarding Initial Debtor Interview and phone call with BDO and Kevin Harrigan in preparation for same	0.30	575.00	172.50
01/16/2025	DXS	B110	Prepare for and attend initial debtor interview	0.70	615.00	430.50
01/16/2025	LL	B110	File sale procedures motion	0.20	375.00	75.00
01/16/2025	SEW	B110	Attend initial debtor interview	0.50	575.00	287.50
01/21/2025	DXS	B110	Conference with Raines' team to discuss status of SOALs and SOFAs (.5); attention to review and analysis of draft SOALs and SOFAs (1.2)	1.70	615.00	1,045.50
01/21/2025	JNK	B110	counsel call regarding review of SOFAs and schedules (0.5); initial review/analysis of schedules (2.8)	3.30	485.00	1,600.50
01/21/2025	MJR	B110	Calls and communications with client regarding operational issues (0.1); strategy discussions with RFL team members (0.5)	0.60	860.00	516.00
01/21/2025	MJR	B110	Call with client and BDO regarding KEIP and other open matters	0.50	860.00	430.00
01/21/2025	SEW	B110	Meeting with M. Lindsay and internal team to discuss status of certain schedules and strategy regarding review and analysis of same to ensure completion	0.50	575.00	287.50
01/21/2025	SEW	B110	Review and analyze certain of the Debtors' schedules to identify missing or inaccurate information and confer with J. Kelly regarding same	0.80	575.00	460.00
01/21/2025	SEW	B110	Further review of additional contract-related documents and update list of executory contracts for schedules and related matters, and confer with BDO and M. Lindsay regarding same	0.60	575.00	345.00
01/21/2025	TAR	B110	Meeting and follow up correspondence with RFL team to discuss issues related to filing of SOALs and Schedules; review of contracts and information related to Schedules and SOALs.	2.00	670.00	1,340.00
01/22/2025	HAR	B110	Analyze pending first day issues and provide comments regarding same to D. Schimizzi	0.90	665.00	598.50

01/22/2025	JDN	B110	Discussion with Raines team (re: strategy, next steps, issues to address, etc.)	0.90	425.00	382.50
01/22/2025	JNK	B110	Review SOFA's (1.2); prepare comments to schedules and SOFAs to BDO and Omni (0.7)	1.90	485.00	921.50
01/22/2025	SEW	B110	Phone calls and emails with M. Lindsay and BDO regarding executory contracts and proposed cure amounts for schedule G (.5), review updated list and analysis provided by BDO (.5), and trade emails with Kevin Harrigan and BDO regarding review and revisions to same (.3)	1.30	575.00	747.50
01/22/2025	SEW	B110	Further analysis of SOFAs and schedules and confer with M. Lindsay regarding same	0.80	575.00	460.00
01/22/2025	TAR	B110	Call with Raines team to discuss continued analysis of information related to SOFA and SOAL filings; review of relevant information to be shared with BDO in furtherance thereof	3.40	670.00	2,278.00
01/23/2025	JNK	B110	Research/analysis of environmental disclosures.	2.70	485.00	1,309.50
01/23/2025	KJL	B110	Attend MSHA-led interviews of Corsa employees regarding January 10 incident at Acosta mine	6.30	875.00	5,512.50
01/23/2025	MJR	B110	Correspond with client regarding open matters	0.30	860.00	258.00
01/23/2025	SEW	B110	Confer with J. Kelly and M. Lindsay regarding various questions on the SOFAs and review J. Kelly's research regarding same (.5); review updated list of executory contracts and address outstanding comments / questions regarding same (1.0); trade emails with M. Lindsay and D. Schimizzi regarding additional questions pertaining to schedule G (.3); update and finalize list of contracts and send email to Omni regarding same (.3)	2.10	575.00	1,207.50
01/24/2025	JNK	B110	Attend call with financial advisor, claims agent and counsel team relating to schedules and SOFAs	2.00	485.00	970.00
01/24/2025	SEW	B110	Initial review of updated schedules and SOFAs (.3) and meeting with BDO, Omni, and internal team regarding concerns and changes to same (2.0)	2.30	575.00	1,322.50
01/27/2025	LL	B110	Review docket for new filings	0.10	375.00	37.50
01/27/2025	MJR	B110	Call with client regarding upcoming hearing	0.20	860.00	172.00
01/27/2025	SEW	B110	Attention to matters regarding executory contracts and leases, including correspondence with M. Lindsay, BDO, and Omni regarding same, and instruct omni regarding same	0.70	575.00	402.50

01/28/2025	MAL	B110	Review and comment on draft global notes and methods for schedules and sofas and conference with S. Wenrich re same.	0.70	780.00	546.00
01/28/2025	MAL	B110	Review NOL data and tax issues and review and update draft schedules regarding same.	0.70	780.00	546.00
01/28/2025	MJR	B110	Attention to LSQ issue and correspond with LSQ counsel regarding same	0.30	860.00	258.00
01/28/2025	SEW	B110	Review and review proposed global notes and confer with M. Lindsay regarding same (.4), and confer with M. Lindsay regarding concerns pertaining to schedules and begin further review and analysis regarding same in advance of meeting with BDO and Omni (2.5)	2.90	575.00	1,667.50
01/29/2025	JNK	B110	Conference call with BDO and Omni re schedules and SOFAs (1.0); discussion with RFL team regarding outstanding items for schedules/SOFA's (0.3)	1.30	485.00	630.50
01/29/2025	LL	B110	Prepare Notice of Cancellation of Omnibus Hearing (0.2); file with court (0.1)	0.30	375.00	112.50
01/29/2025	LL	B110	Review docket for new filings and update calendars	0.10	375.00	37.50
01/29/2025	MAL	B110	telephone conference with financial advisor and omni regarding review and revisions to schedules/sofas.	1.00	780.00	780.00
01/29/2025	SEW	B110	Finalize review and analysis of all executory contracts and unexpired leases for each Debtor and create spreadsheet indicating all revisions necessary for accuracy (3.7); page turn of updated schedules with BDO and Omni and discuss outstanding matters / corrections needed to finalize same (1.0); and correspondences with M. Lindsay and J. Mahan regarding issues pertaining to same (.2)	4.90	575.00	2,817.50
01/30/2025	HAR	B110	Prepare draft of notice of final order regarding equity transfer procedures and forward same to Omni for service	1.60	665.00	1,064.00
01/30/2025	LL	B110	Review sale order and update deadlines	0.40	375.00	150.00
01/30/2025	MAL	B110	Review incentive program details and telephone conference with BDO regarding same	1.00	780.00	780.00
01/30/2025	MAL	B110	Conference and emails with D. Schimizzi regarding proposed employee incentive program.	0.70	780.00	546.00
01/30/2025	SEW	B110	Review and analyze updated schedules, identify additional problems and instruct Omni on same	1.00	575.00	575.00
01/31/2025	MAL	B110	Review of revised draft schedules and statements of financial affairs and issues regarding executory contract notices.	1.50	780.00	1,170.00

01/31/2025	SEW	B110	Review updated schedules from Omni and confer with M. Lindsay regarding same (.5); confer with M. Lindsay regarding schedule of contracts to be assumed, then analyze draft of same and revise as necessary for accuracy and send email to BDO regarding same (1.3)	1.80	575.00	1,035.00
01/10/2025	JNK	B120	Analysis of relevant insurance policies and obligations thereunder and under applicable PA law (2.0)	2.00	485.00	970.00
01/10/2025	SEW	B120	Confer with M. Roeschenthaler regarding stay violation and related demand letter (.1), revise same (.2), trade emails with client regarding same and make necessary changes to notice (.3), then finalize correspondence and send to opposing counsel (.2)	0.80	575.00	460.00
01/11/2025	JNK	B120	Correspondence with M. Roeschenthaler regarding analysis of insurance policy	0.30	485.00	145.50
01/13/2025	JNK	B120	Discussions with M. Roeschenthaler and M. Lindsay relating to asset analysis.	0.80	485.00	388.00
01/14/2025	JNK	B120	Asset analysis relating to Debtors' insurance policies.	2.50	485.00	1,212.50
01/14/2025	MJR	B120	Additional calls and correspondence with case parties regarding sale procedures and follow up regarding same	2.30	860.00	1,978.00
01/16/2025	JNK	B120	Analysis relating to ownership of goods (2.0); discussion with M. Lindsay re find relating to analysis (0.2); review lien search (0.4)	2.60	485.00	1,261.00
01/17/2025	JNK	B120	Research relating to notice requirements under applicable state and federal law.	2.30	485.00	1,115.50
01/22/2025	JNK	B120	Conference call with counsel team (0.8)	0.80	485.00	388.00
01/24/2025	KJL	B120	Confer with M. Roeschenthaler regarding water treatment trust documentation and attention to review of same (.6); call with counsel for bonding company and email communications regarding same (.3)	0.90	875.00	787.50
01/27/2025	KJL	B120	Analysis of Debtor documentation regarding water treatment obligations	0.80	875.00	700.00
01/07/2025	DXS	B130	Correspondence with H. Readshaw regarding form asset purchase agreement for sale procedures motion (.3); continue drafting sale and procedures motion (2.3)	2.60	615.00	1,599.00
01/07/2025	HAR	B130	Attention to sale process and begin drafting APA	5.90	665.00	3,923.50
01/07/2025	MJR	B130	Calls with potential buyers and follow up with client (0.6)	0.60	860.00	516.00

01/08/2025	HAR	B130	Obtain and review facts regarding assets (1.0); Attention to drafting asset purchase agreement (4.4)	5.40	665.00	3,591.00
01/09/2025	HAR	B130	Attention to draft APA	3.40	665.00	2,261.00
01/09/2025	KJL	B130	Prepare confidentiality agreement for use in sales process and confer with D. Schimizzi regarding same	1.40	875.00	1,225.00
01/09/2025	MAL	B130	Telephone call with MJR and potential interested purchaser.	0.50	780.00	390.00
01/09/2025	MJR	B130	Calls with potential buyers and counsel	0.70	860.00	602.00
01/10/2025	DXS	B130	Continue drafting and revising proposed sale and bidding procedures motion and multiple conferences with Raines' team regarding provisions for the same (4.9); research and review authority for inclusion in sale and bidding procedures motion (2.6); continue drafting and revising proposed bidding procedures order, bidding procedures, and related notices (3.8)	11.30	615.00	6,949.50
01/10/2025	HAR	B130	Analysis regarding sale process (1.3); Review/revise draft of APA per additional facts/strategies (2.4); Review and revise draft of Sale Motion (1.5); Review proposed sale procedures and provide comment regarding same (.9)	6.10	665.00	4,056.50
01/10/2025	KJL	B130	Attention to email communications and conference call with potentially interested bidder	0.90	875.00	787.50
01/10/2025	MAL	B130	Telephone conference with interested buyer regarding potential sale process and data room access.	0.60	780.00	468.00
01/10/2025	MAL	B130	Review of data room and telephone calls with client and financial advisor regarding same.	1.00	780.00	780.00
01/10/2025	MJR	B130	Calls and correspondence with potential bidder	0.40	860.00	344.00
01/11/2025	KJL	B130	Prepare and send Non-Disclosure Agreement to potential bidder to access company data room and email communications regarding same	0.80	875.00	700.00
01/11/2025	MAL	B130	Review updated data room and and review draft NDA for data room access	1.20	780.00	936.00
01/11/2025	MJR	B130	Discuss sale status with RFL teams and inquiries by prospective buyers	0.20	860.00	172.00
01/12/2025	MAL	B130	Review and comment on draft APA and Bidding Procedures Order.	2.60	780.00	2,028.00
01/12/2025	MJR	B130	Call with BDO regarding sale status and strategy	0.30	860.00	258.00

01/13/2025	DXS	B130	Review of internal comments to draft sale pleadings (.7); Attention to further review of and revisions to sale motion, bid procedures motion, and form asset purchase agreement (4.1)	4.80	615.00	2,952.00
01/13/2025	HAR	B130	Analyze issues regarding potential asset sale (1.5); Revise APA to conform to proposed Bid Procedures and developing situation (1.7)	3.20	665.00	2,128.00
01/13/2025	KJL	B130	Finalize NDA with potential bidder x (.5); prepare and negotiate NDA with potential bidder y (.9); prepare NDA for potential bidder z (.4); prepare email communications to client and counsel regarding same (.4)	2.20	875.00	1,925.00
01/13/2025	MAL	B130	Various meetings with M. Roeschenthaler and D. Schimizzi regarding asset purchase agreement and bidding procedures order, and review and comments on same.	2.10	780.00	1,638.00
01/13/2025	MAL	B130	Various conferences regarding potential buyers and review of NDAs and data room information.	1.50	780.00	1,170.00
01/13/2025	MJR	B130	Call with BDO regarding sale process	0.30	860.00	258.00
01/13/2025	MJR	B130	Call with potential buyer and counsel	0.30	860.00	258.00
01/13/2025	MJR	B130	Review and revise form APA and confer with RFL team members regarding same	2.10	860.00	1,806.00
01/13/2025	MJR	B130	Correspond with consultation parties regarding apa	0.30	860.00	258.00
01/13/2025	MJR	B130	Follow up with potential bidders and counsel	0.70	860.00	602.00
01/13/2025	MJR	B130	Additional calls from parties interested in potential acquisition and follow up with client regarding same	1.60	860.00	1,376.00
01/13/2025	MJR	B130	Call with BDO and prospective buyer	0.20	860.00	172.00
01/13/2025	MJR	B130	Attention to APA revisions and correspond with consultation party regarding same	1.40	860.00	1,204.00
01/13/2025	SEW	B130	Confer with D. Schimizzi regarding current drafts of the sale motion and bidding procedures (.2), then proofread and revise same and circulate to internal team for approval and finalization (2.3)	2.50	575.00	1,437.50
01/13/2025	SEW	B130	Further discussions with D. Schimizzi regarding revisions to sale motion and ancillary documents, then make additional revisions in accordance with same	0.40	575.00	230.00
01/14/2025	DXS	B130	Continue drafting and revising sale motion, proposed bid procedures order, proposed bidding procedures, and related notices (3.9); conferences with Raines team regarding strategy and next steps (.7); research and analysis of authority relating to treatment of obligations through 363 sales (2.1)	6.70	615.00	4,120.50

01/14/2025	KJL	B130	Prepare NDA for potential bidder (a) and email communications regarding same (.7); attention to emails with client and other bidders addressing execution of NDAs and data room access (1.4); meet with M. Lindsay regarding Data Room status and strategic review process (.5); initial review of contracts in Data Room and analysis of surety agreement (.8)	3.40	875.00	2,975.00
01/14/2025	MAL	B130	Various discussions and review of NDAs and details regarding potential purchasers.	0.80	780.00	624.00
01/14/2025	MAL	B130	Further review and comment on proposed sale and bidding procedures pleadings.	2.00	780.00	1,560.00
01/14/2025	MJR	B130	Attention to bid procedures and correspond with parties in interest regarding terms and language (1.1); follow up with RFL team regarding same (.8)	1.90	860.00	1,634.00
01/14/2025	SEW	B130	Review current drafts of sale motion and bidding procedures and draft related motion to expedite hearing on bidding procedures and related issues	1.70	575.00	977.50
01/15/2025	DXS	B130	Review and analyze comments to draft sale pleadings from key case parties (1.2); attention to further revisions to draft sale pleadings for purposes of incorporating comments from interested parties (2.9)	4.10	615.00	2,521.50
01/15/2025	HAR	B130	Analyze comments to draft APA received from counsel for KIA II and Keybank and incorporate same into revision of APA	2.20	665.00	1,463.00
01/15/2025	KJL	B130	Review and revise Non-Disclosure Agreements with potential bidders and communications with interested parties regarding sale (3.4); prepare list of potential bidders (.7)	4.10	875.00	3,587.50
01/15/2025	MAL	B130	Review and comment on revisions to sale documents and various conferences and emails regarding same	2.10	780.00	1,638.00
01/15/2025	MAL	B130	Various emails and discussions regarding NDA terms and communications with interested parties	0.70	780.00	546.00
01/15/2025	MJR	B130	Calls and correspondence with potential bidders and counsel	1.40	860.00	1,204.00
01/16/2025	DXS	B130	Attention to final review of and revisions to sale motion, proposed bidding procedures order, related notices, and motion to expedite (3.2); finalize and instruct L. Lescalette on filing of the same (.8); correspondence with chambers and Omni regarding entry of expedited scheduling order and service of the same (.4)	4.40	615.00	2,706.00
01/16/2025	HAR	B130	Attend to sale procedures motion issues and discuss same with D. Schimizzi	0.60	665.00	399.00

01/16/2025	KJL	B130	Communications relating to potential bidders and analysis of Corsa Coal Tracker spreadsheet (.4); call with BDO regarding same (.4); attention to Corsa Coal sales procedure motion (.5)	4.20	875.00	3,675.00
01/16/2025	MAL	B130	Review and comments regarding sale motion and bidding procedures and discussions regarding same.	1.60	780.00	1,248.00
01/16/2025	MAL	B130	Telephone conference with financial advisor team and client regarding status and strategy for sale process	0.60	780.00	468.00
01/16/2025	MJR	B130	Correspond with client regarding creditor inquiries and sale and communications with case parties and potential bidders regarding sale procedures	1.80	860.00	1,548.00
01/16/2025	MJR	B130	Attention to sale procedures issues and follow up with counsel for prospective bidders regarding same	0.80	860.00	688.00
01/16/2025	MJR	B130	Calls with representatives of potential buyers regarding sale and related procedures	1.10	860.00	946.00
01/16/2025	SEW	B130	Correspondence with internal team regarding finalizing sale pleadings	0.20	575.00	115.00
01/17/2025	DXS	B130	Review expedited scheduling order on bidding procedures and correspondence with Omni regarding service of the same (.3); attention to preparation of summaries regarding sale and bidding proceeds and correspondence with M. Roeschenthaler regarding the same (1.3); review of updated teaser and correspondence with E. Blum regarding the same (.2)	1.80	615.00	1,107.00
01/17/2025	MAL	B130	Emails and discussions with interested parties regarding sale process	1.20	780.00	936.00
01/20/2025	DXS	B130	Review and revise teaser for distribution to potential purchasers and correspondence with Debtors' professionals regarding the same	0.40	615.00	246.00
01/20/2025	MJR	B130	Correspond with potential buyers and counsel	0.30	860.00	258.00
01/22/2025	KJL	B130	Prepare email to counsel for potential bidder regarding proposed version of Asset Purchase Agreement (APA) and analysis of APA for same	0.90	875.00	787.50
01/22/2025	MJR	B130	Calls and communications with prospective buyers and related follow up	1.40	860.00	1,204.00
01/23/2025	KJL	B130	Prepare Non-Disclosure Agreement for potential bidder for the Debtors' assets and prepare email communication regarding same	0.50	875.00	437.50
01/24/2025	KJL	B130	Attention to proposed revisions to Non-Disclosure Agreement and email communications with potential bidder and client regarding same; prepare additional NDA for new potential bidder	1.10	875.00	962.50

01/24/2025	MJR	B130	Correspond with BDO regarding sale process and bidders (0.3); discuss sale issues and lease and contract assumption issues with Raines team (0.6)	0.90	860.00	774.00
01/24/2025	MJR	B130	Correspond with potential buyers and follow up with BDO and M. Lindsay	1.30	860.00	1,118.00
01/25/2025	MJR	B130	Correspond with BDO regarding sale related issues	0.20	860.00	172.00
01/27/2025	DXS	B130	Multiple conferences with Debtors' professionals regarding sale motion and related bidding procedures (.8); review and analyze objections to bidding procedures motion and correspondence with objecting parties regarding the same (2.2); correspondence with interested parties regarding objections to bidding procedures and attention to further revisions to proposed bidding procedures order to resolve objections (2.9)	5.90	615.00	3,628.50
01/27/2025	MJR	B130	Correspondence with potential buyers	0.20	860.00	172.00
01/27/2025	MJR	B130	Call with potential buyer and counsel	0.30	860.00	258.00
01/27/2025	MJR	B130	Calls and communications with committee and case parties regarding sale procedures (0.3); discuss same with RFL team (0.2); call with client (0.1); follow up regarding same (0.7)	1.30	860.00	1,118.00
01/27/2025	SEW	B130	Review and analyze objections to sale / bid procedures motions (.7) and internal correspondence regarding same (.2)	0.90	575.00	517.50
01/28/2025	DXS	B130	Further revisions to final revised bidding procedures order, document comparison, and certification of counsel regarding the same (1.2); correspondence with parties regarding approval of the same and finalize and file via CM/ECF (.4)	1.60	615.00	984.00
01/29/2025	KJL	B130	Confer with M. Roeschenthaler and M. Lindsay regarding PA DEP bond forfeiture procedures (.5); Perform legal research and commence preparation of stipulation as to same (5.2)	5.70	875.00	4,987.50
01/29/2025	MAL	B130	telephone conference with financial advisor and follow up meetings regarding sale process and issues.	1.20	780.00	936.00
01/29/2025	MJR	B130	Call with client and BDO regarding sale status and follow up with various buyers	0.90	860.00	774.00
01/30/2025	KJL	B130	Prepare Stipulation and Consent Order Revising Bond Forfeiture Proceedings (4.4); Confer with D. Schimizzi regarding same (.3)	4.70	875.00	4,112.50
01/30/2025	MAL	B130	Review marketing materials and discussions regarding sale process	1.10	780.00	858.00

01/30/2025	MJR	B130	Calls with potential buyers and meetings with RFL team members regarding same	0.70	860.00	602.00
01/31/2025	KJL	B130	Prepare non-disclosure agreement for potential bidder for Debtors' assets and email communications regarding same	0.50	875.00	437.50
01/31/2025	MJR	B130	Calls and communications with BDO re sale and follow up calls with interested parties	0.80	860.00	688.00
01/31/2025	SEW	B130	Update / draft notice of sale for filings	0.20	575.00	115.00
01/09/2025	MAL	B150	Attention to and negotiation regarding critical vendor issues and amendments to critical vendor agreements.	2.10	780.00	1,638.00
01/09/2025	MJR	B150	Field calls from creditors and other case parties in interest	0.60	860.00	516.00
01/09/2025	MJR	B150	Calls with case parties	0.30	860.00	258.00
01/13/2025	SEW	B150	Phone call with opposing counsel regarding stay violation and related payment (.2) and confer with internal team regarding same (.1)	0.30	575.00	172.50
01/14/2025	MAL	B150	Various telephone calls regarding requests for and details regarding critical vendors.	0.70	780.00	546.00
01/14/2025	SEW	B150	Review contracts in relation to creditor inquiry and trade emails with M. Lindsay regarding same	0.20	575.00	115.00
01/17/2025	DXS	B150	Correspondence with J. Roach regarding Prime Alliance claims	0.30	615.00	184.50
01/17/2025	DXS	B150	Correspondence with J. Kettering and M. Lindsay regarding GMS Mine Service claims and treatment of the same	0.60	615.00	369.00
01/17/2025	MAL	B150	Various emails and discussions with creditors regarding status, payments and sale process	0.80	780.00	624.00
01/21/2025	DXS	B150	Correspondence with M. Lindsay and J. Kettering regarding critical vendor inquiry	0.30	615.00	184.50
01/22/2025	DXS	B150	Correspondence with J. Kettering and M. Lindsay regarding potential critical vendor claim	0.40	615.00	246.00
01/22/2025	MJR	B150	Prepare for and participate in call with committee counsel	0.50	860.00	430.00
01/23/2025	MJR	B150	Attention to creditor inquiries and follow up with RFL team regarding same	0.60	860.00	516.00
01/28/2025	MAL	B150	Review PA DEP communications and telephone conference with PA DEP regarding ongoing environmental obligations and issues.	0.80	780.00	624.00
01/28/2025	MAL	B150	Various discussions and communications regarding LSQ agreement and status of transactions.	1.30	780.00	1,014.00
01/28/2025	MJR	B150	Call with DEP and surety regarding claims issues (0.4); discuss next steps with K. Lund (0.2); discuss strategy with M. Lindsay (0.2)	0.80	860.00	688.00

01/29/2025	MJR	B150	Correspond with client regarding open matters (0.2); correspond with LSQ regarding financing protocol (0.2); follow up regarding creditor issues and communications with creditors (1.1)	1.50	860.00	1,290.00
01/31/2025	MAL	B150	Attention to various creditor issues and inquiries and review and revise supply and critical vendor agreements.	1.30	780.00	1,014.00
01/06/2025	TAR	B170	Background research in anticipation of drafting multiple applications to retain various professionals	1.80	670.00	1,206.00
01/06/2025	TAR	B170	Begin drafting Retention App for financial advisors including corresponding Order and Declaration of Evan Blum	3.40	670.00	2,278.00
01/06/2025	TAR	B170	Drafting application to retain RFL and review related conflicts info	2.80	670.00	1,876.00
01/07/2025	TAR	B170	Discussions with M. Roeschenthaler relating to details of Retention Applications (0.2); modify existing drafts accordingly (3.9); continue drafting Application to Retain RFL and corresponding Declaration and Order (4.8)	8.90	670.00	5,963.00
01/08/2025	TAR	B170	Revise and finalize Application to Employ financial advisors BDO Consulting Group	3.10	670.00	2,077.00
01/13/2025	JNK	B170	Discuss finalizing and filing of retention applications and interim compensation motions (0.2); revise BDO retention application (0.6); communications with BDO re retention application and OCP list (0.4)	1.20	485.00	582.00
01/13/2025	JNK	B170	Research related to retention application for Canadian counsel (0.8); discussion with M. Lindsay re Canadian retention applications (0.3).	1.10	485.00	533.50
01/13/2025	JNK	B170	Discussion filing supplemental OCP list with M. Lindsay	0.20	485.00	97.00
01/14/2025	JNK	B170	Revise BDO Retention Application per communications with BDO(0.8); follow-up correspondence with BDO re retention application (0.2)	1.00	485.00	485.00
01/15/2025	JNK	B170	Communications with BDO re retention app (0.3); review BDO's comments/edits to retention app (0.4); draft motion to expedite hearing and order on BDO retention app (0.6)	1.30	485.00	630.50
01/15/2025	MAL	B170	Various discussions and updates to motion and order regarding ordinary course professionals motion and supplement	0.80	780.00	624.00
01/16/2025	JNK	B170	Preparation of retention application for Canadian counsel.	1.60	485.00	776.00
01/17/2025	JNK	B170	Continued drafting and finalizing Stikeman Retention application, order and declarations.	1.30	485.00	630.50

01/17/2025	MAL	B170	Review and comment on application to employ Stikeman as Canadian counsel and conference with J. Kelly regarding same.	1.00	780.00	780.00
01/20/2025	JNK	B170	Correspond with Stikeman re retention application.	0.20	485.00	97.00
01/20/2025	JNK	B170	Revise Stikeman retention applications per Stikeman's comments	0.60	485.00	291.00
01/21/2025	JNK	B170	Communications with Stikeman re retention application	0.20	485.00	97.00
01/24/2025	DXS	B170	Correspondence with Raines' team regarding status of retention applications and review large fee guidelines in connection with the same	0.80	615.00	492.00
01/24/2025	JNK	B170	multiple communications with BDO and counsel team re retention application (0.3); communications with client and M. Lindsay re Stikeman application (0.3); revise Stikeman application per discussions (0.5); review/revise amended RFL retention application, order and declaration and finalize for filing (0.7)	2.10	485.00	1,018.50
01/24/2025	MJR	B170	Follow up regarding UST comments regarding retention including revision of retention application and declaration, calls and correspondence with K. Bradley and attention to related issues	1.10	860.00	946.00
01/24/2025	MJR	B170	Amend retention app and follow up with UST regarding same and other retention matters	1.10	860.00	946.00
01/24/2025	TAR	B170	Review of issues related to filing of exhibits	0.30	670.00	201.00
01/27/2025	JNK	B170	Prepare and finalize certification of counsel for OCP motion (0.3); prepare certificates of no objection relating to interim compensation motion and RFL retention application (0.3); multiple correspondence with client re review and comments to BDO retention application (0.2); prepare notice of hearing on BDO and Stikeman Retention Applications (0.3); final review and preparation for filing of BDO and Stikeman Retention applications (0.4)	1.50	485.00	727.50
01/09/2025	JNK	B185	Draft motion to rejection executory contract (1.2); draft motion to expedite hearing for motions to reject and schedule extension motion (0.8)	2.00	485.00	970.00
01/09/2025	KJL	B185	Attention to revisions to Critical Vendor Agreement and email communications regarding same	0.40	875.00	350.00
01/09/2025	MAL	B185	Review coal sale agreements, discussions with client and analyze potential rejection issues.	1.60	780.00	1,248.00

01/10/2025	JNK	B185	Revise motion to reject executory contract and related motion to expediate (0.7); communications with UST re motion to reject (0.2); discussions with M. Lindsay regard status of motion to reject (0.2)	1.10	485.00	533.50
01/10/2025	MAL	B185	Draft and revise Motion to Reject Oluma contract and various discussions with client regarding same.	1.80	780.00	1,404.00
01/10/2025	MJR	B185	Review and revise motion to reject contract	0.20	860.00	172.00
01/11/2025	MAL	B185	Review contract provisions and draft K. Harrigan Declaration in support of Motion to Reject Contract.	1.30	780.00	1,014.00
01/13/2025	JNK	B185	Review/revise declaration of Kevin Harrigan in support of motion to reject.	0.30	485.00	145.50
01/13/2025	MAL	B185	Review, revise and file Declaration for contract rejection motion and prepare outline for same.	0.80	780.00	624.00
01/14/2025	TAR	B185	Review and analysis of contracts in furtherance of assumption/rejection options	1.60	670.00	1,072.00
01/15/2025	JDN	B185	Meeting with T. Roeschenthaler, J. Kelly, S. Wenrich, and M. Lindsay to discuss contract review and strategy.	0.40	425.00	170.00
01/15/2025	JNK	B185	Counsel meeting to discuss contract review (0.4); review/analysis of debtors' contracts (0.6); hearing relating to rejection of executory contract (1.0).	2.00	485.00	970.00
01/15/2025	MAL	B185	Prepare for and attend hearing on Motion to Reject Oluma Contract.	1.80	780.00	1,404.00
01/15/2025	MAL	B185	Internal meeting regarding contract review and analysis	1.00	780.00	780.00
01/15/2025	SEW	B185	Correspondence with M. Lindsay, T. Roeschenthaler, J. Kelly, and J. Nelms regarding contract and lease analysis project (.5) and plan and delegate tasks pertaining to same (.8); begin review and analysis (.5)	1.80	575.00	1,035.00
01/15/2025	TAR	B185	Review and analysis of contracts in furtherance of assumption/rejection options	1.80	670.00	1,206.00
01/15/2025	TAR	B185	Meeting with RFL team to discuss contract review for purposes of assumption/rejection	0.30	670.00	201.00
01/16/2025	JDN	B185	Executory Contracts Review and Investigation	4.00	425.00	1,700.00
01/16/2025	JNK	B185	Review/ Analysis of debtors' contracts (1.8); discussion with S. Wenrich relating to contract analysis (0.2)	2.00	485.00	970.00
01/16/2025	SEW	B185	Initial review and analysis of contracts and related documents with attention toward identification of certain parties and vendor status and confer with J. Kelly regarding same	0.70	575.00	402.50
01/16/2025	TAR	B185	Review and analysis of contracts in furtherance of assumption/rejection options	1.30	670.00	871.00

01/17/2025	JDN	B185	Review and analysis of executory contracts	2.90	425.00	1,232.50
01/17/2025	JNK	B185	Additional analysis of potential executory contracts and unexpired leases	1.20	485.00	582.00
01/17/2025	MJR	B185	Respond to client regarding lease inquiry	0.10	860.00	86.00
01/17/2025	SEW	B185	Review current list of reviewed contracts and compile all data (.3); analyze discrepancies between contracts and trade emails with M. Lindsay regarding same (.5)	0.80	575.00	460.00
01/17/2025	TAR	B185	Review and analysis of contracts in furtherance of assumption/rejection options	4.50	670.00	3,015.00
01/19/2025	SEW	B185	Continued analysis of contracts and identify discrepancies related to same (.5); trade emails with M. Lindsay and review current list of contract and related documents, and relevant contracts, and identify certain types of contracts (1.1)	1.60	575.00	920.00
01/20/2025	MJR	B185	Correspond with client regarding lease issues (0.2); follow up with RFL team regarding same (0.2); review various agreements (0.9)	1.30	860.00	1,118.00
01/20/2025	SEW	B185	Confer with M. Lindsay regarding summary of contracts and related documents (.2) and complete more thorough analysis and summary regarding same to identify pertinent agreements (3.6)	3.80	575.00	2,185.00
01/20/2025	TAR	B185	Review and analysis of contracts in furtherance of assumption/rejection options	10.00	670.00	6,700.00
01/22/2025	JNK	B185	Revise potential executory contracts list with brief descriptions of each contract.	1.10	485.00	533.50
01/06/2025	DXS	B190	Attention to final review of and revisions to first day motions for DIP Financing, Joint Administration, Case Management, Retention of 156(c) and 327(a) professionals, Approval to Pay Wages, Utilities, Taxes, Insurance, Critical Vendors, and Trade Restrictions (6.7); attention to preparation of first day agenda and hearing binder index (.8); conferences with Raines teams regarding status of first day motions and final revisions to the same (.8); review and analysis of evidence for use in connection with DIP Financing Motion (.6)	6.90	615.00	4,243.50
01/06/2025	JDN	B190	Finalize notices relating to first days	1.30	425.00	552.50
01/06/2025	JDN	B190	Research relating to potential issues associated with first day hearings	4.60	425.00	1,955.00
01/06/2025	JNK	B190	Continued research relating to first days and attention to sale papers	7.20	485.00	3,492.00

01/06/2025	MAL	B190	Review and compare proposed first day orders to prior orders based on UST comments and revisions and consider additional potential revisions.	1.80	780.00	1,404.00
01/06/2025	SEW	B190	Assist in finalization and filing of first day pleadings and attention to internal emails regarding same	0.80	575.00	460.00
01/06/2025	SEW	B190	Coordinate with internal team regarding logistics for upcoming days and correspond with client re same	0.30	575.00	172.50
01/07/2025	DXS	B190	Numerous conferences and meetings with Debtors' professionals regarding issues raised by United States Trustee, preparation for first day hearings, and preparation of revised pleadings for first day hearings (2.2); attention to review of and revisions to amended declaration and notice of the same (1.1); attention to review of and revisions to responses to United States Trustee inquiries and other parties (1.8)	5.10	615.00	3,136.50
01/07/2025	JDN	B190	Drafting motion to extend time to file schedules and statements	1.60	425.00	680.00
01/07/2025	JNK	B190	Draft motion to appoint foreign representative, proposed order, and notice for expedited hearing.	2.80	485.00	1,358.00
01/07/2025	JNK	B190	Revise motion for schedule extension.	0.40	485.00	194.00
01/07/2025	JNK	B190	Multiple communications with claims agent re service of various filings.	0.30	485.00	145.50
01/07/2025	JNK	B190	Correspondence with case parties re first days and attention to same to address potential objections and conduct related research (5.1); correspond with Raines team re same (1.)	6.10	485.00	2,958.50
01/07/2025	MAL	B190	Prepare for first day hearings and multiple meetings and correspondence regarding same.	5.50	780.00	4,290.00
01/07/2025	MAL	B190	Review and revise foreign representative motion and multiple meetings and research regarding same.	2.50	780.00	1,950.00
01/07/2025	MAL	B190	Various communications and meetings with client and financial advisor regarding first day motions and preparation for hearings on same.	3.20	780.00	2,496.00
01/07/2025	MJR	B190	Calls with counsel for KeyBank regarding first day relief (0.3); calls with DIP lender and other case parties regarding first day relief and attention to revisions to proposed orders (3.7); follow up regarding same and hearing preparation (1.6)	5.60	860.00	4,816.00

01/07/2025	MJR	B190	Attention to additional first days and coordination with Canadian counsel and correspondence with RFL team regarding same	4.90	860.00	4,214.00
01/07/2025	SEW	B190	Review and analyze UST's comments and requests pertaining to certain first day motions and provide suggested responses to same for internal review and approval (.7) and confer with M. Lindsay, D. Schimizzi, and J. Kelly regarding same (.4)	1.10	575.00	632.50
01/07/2025	SEW	B190	Review and analyze UST's concerns and suggestions to all first day motions (.2) and correspondences with J. Kelly and D. Schimizzi regarding resolution of same (.4)	0.60	575.00	345.00
01/07/2025	SEW	B190	Confer with M. Roeschenthaler regarding stay violation issue and review correspondence regarding same (.2); research pertaining to same (.8); and draft notice of stay violation (.6)	1.60	575.00	920.00
01/07/2025	SEW	B190	Review docket and various pleadings, and prepare pleadings as necessary, in preparation for first day hearings and internal correspondence regarding same	2.70	575.00	1,552.50
01/07/2025	SEW	B190	Correspondence with United State Trustee regarding first day motions and review UST Objection (.5); preparation for presentation of various first day motions at hearing (2.4)	2.90	575.00	1,667.50
01/07/2025	SEW	B190	Continued preparation for hearing on tax motion, wages motion, and cash management motion	1.20	575.00	690.00
01/08/2025	DXS	B190	Meetings with client and Debtors' professionals to prepare for first day hearings (2.8); continue preparing for and attend first day hearings (3.6) preparation and review of revised interim orders and correspondence with interested parties regarding the same (1.2)	7.60	615.00	4,674.00
01/08/2025	JDN	B190	Revise certain first day motions, discuss revisions and next steps with internal team, review various UST objections to first day motions, and attention to related issues	3.30	425.00	1,402.50
01/08/2025	JNK	B190	Review/ analysis of UST objection to first day motions (0.7); Assist in preparation for hearing on first day motions (1.5)	2.20	485.00	1,067.00

01/08/2025	JNK	B190	Discuss preparations of revised orders with counsel team (0.5); revise/review revised interim orders relating to DIP Motion; Cash Management Motion, and Critical Vendor Motions (1.5); communications with UST re revised orders (0.5); multiple discussion with RFL team regarding UST comments to revised orders (0.7); assist with revised orders and exhibits thereto (0.8)	4.00	485.00	1,940.00
01/08/2025	KJL	B190	Analysis of US Trustee's omnibus objection and reservation of rights to Debtor's Motions (.4); attention to revised declaration of K. Harrigan (.3); Prepare for and attend Hearings on Debtors' First Day Motions and confer with M. Roeschenthaler and testifying witnesses regarding same (5.7); research and analysis of Norfolk Southern Terms and Conditions (.5)	6.90	875.00	6,037.50
01/08/2025	MAL	B190	Prepare for and attend hearings on first day motions and related relief.	5.80	780.00	4,524.00
01/08/2025	MAL	B190	Follow up review, revision and preparation of first day orders and various meetings and correspondence with interested parties regarding same.	4.20	780.00	3,276.00
01/08/2025	MAL	B190	Attention to Interim Order and multiple discussions with client, financial advisors and United States Trustee's Office regarding critical vendor issues.	2.60	780.00	2,028.00
01/08/2025	MJR	B190	Prepare for and participate in first day hearings, including discussions with BDO, client and Raines team members	6.20	860.00	5,332.00
01/08/2025	MJR	B190	Calls and communications regarding finalizing orders and review of same (1.6); calls relating to DIP financing (0.8); call with court regarding critical vendor (0.2); call with UST regarding critical vendors (0.8); discussions with client and BDO regarding next steps (0.7)	4.10	860.00	3,526.00
01/08/2025	MJR	B190	Revise declaration and calls with client and BDO regarding hearing preparation (1.8); meeting with RFL team regarding first day hearings (0.6); additional hearing preparation (1.6)	4.00	860.00	3,440.00
01/08/2025	MJR	B190	Attend first day hearings	2.20	860.00	1,892.00
01/08/2025	MJR	B190	Post-hearing calls with case parties regarding orders and related relief and follow up regarding same	1.20	860.00	1,032.00
01/08/2025	MJR	B190	Calls with UST regarding critical vendor and meetings with client regarding same	1.40	860.00	1,204.00
01/08/2025	SEW	B190	Continued preparation for first day hearings and confer with M. Roeschenthaler and BDO regarding same	4.20	575.00	2,415.00
01/08/2025	SEW	B190	Attend first day hearings	3.40	575.00	1,955.00

01/08/2025	SEW	B190	Assist in finalization of revised interim orders and related pleadings	1.10	575.00	632.50
01/08/2025	SEW	B190	Correspondence with chambers and UST regarding critical vendors	1.40	575.00	805.00
01/08/2025	SEW	B190	Internal correspondence regarding revised critical vendor order (.4); correspondence with UST regarding same (.1); finalize and file revised interim order and related pleadings (.4)	0.90	575.00	517.50
01/09/2025	JNK	B190	RFL discussion re status of matter and outstanding items (0.4); revise and finalize for filing ordinary course professionals motion (0.5); revise RFL retention application and draft declaration in support (1.8); communications with UST re critical vendors (0.2)	2.90	485.00	1,406.50
01/09/2025	SEW	B190	Meeting with internal team regarding necessary tasks and pleadings, status of same, and strategy pertaining to outstanding issues related to first day orders and upcoming pleadings	0.70	575.00	402.50
01/09/2025	SEW	B190	Draft and revise proposed template vendor agreement and review relevant pleadings and documents regarding same (1.2); confer with M. Roeschenthaler regarding same then finalize in accordance with same (.6)	1.80	575.00	1,035.00
01/10/2025	MAL	B190	Review motion to extend schedules and motion to expedite various motions	0.50	780.00	390.00
01/10/2025	MAL	B190	Review certified order for Canadian recognition and emails with Canadian counsel regarding same.	0.40	780.00	312.00
01/10/2025	SEW	B190	Discussion with internal team regarding critical vendors and correspond with BDO regarding same	0.40	575.00	230.00
01/13/2025	JNK	B190	Discuss filing supplement to utility provider list.	0.20	485.00	97.00
01/13/2025	MAL	B190	Various discussions regarding retention applications and status of other motions and emails with trustee's office regarding expedited hearing request and contents of motions.	1.30	780.00	1,014.00
01/13/2025	MAL	B190	Review demand from utility for payment and review utility order and prepare for addition to utilities list.	0.80	780.00	624.00
01/13/2025	SEW	B190	Review and analyze retention applications and pleadings for which Debtors are seeking an expedited hearing, then draft omnibus motion for expedited hearing related to same	0.70	575.00	402.50
01/13/2025	SEW	B190	Coordinate with J. Kelly regarding finalization of various pleadings and finalize and file same	0.50	575.00	287.50

01/14/2025	JNK	B190	Prepare Supplement to OCP Motion	0.60	485.00	291.00
01/14/2025	MAL	B190	Review CCAA pleadings, prepare for and attend CCAA hearing.	1.60	780.00	1,248.00
01/17/2025	JNK	B190	Review language of utilities motion and order relating to supplementing utility list(0.3); Discuss utilities supplement with M. Lindsay (0.2)	0.50	485.00	242.50
01/17/2025	MAL	B190	Telephone call with UST regarding critical vendors and proposed committee and review of information regarding same and emails with UST regarding consent motion to extend time.	0.60	780.00	468.00
01/20/2025	DXS	B190	Correspondence with Debtors' professionals regarding UST inquiries on cash management system and review responses to the same	0.40	615.00	246.00
01/20/2025	JNK	B190	Draft notice of amendment to utilities list and motion; review additional utility providers; prepare exhibit (0.8); communications with BDO re additional utility amounts (0.2); communications with client re additional utility amounts (0.2)	1.20	485.00	582.00
01/20/2025	SEW	B190	Draft proposed response to UST's inquiry related to cash management (.3) and trade emails with internal team and BDO to confirm accuracy of same and obtain additional information (.2)	0.50	575.00	287.50
01/21/2025	JNK	B190	communications with BDO re retention application and utilities supplement (0.3); revisions to utilities supplement exhibit (0.3); discussion re utilities motion and orders with counsel team (0.2)	0.80	485.00	388.00
01/21/2025	SEW	B190	Research relating to KEIP	0.20	575.00	115.00
01/22/2025	DXS	B190	Conference with Raines' team regarding status of pending motions, final first day hearings, committee appointment, and next steps in case administration	0.80	615.00	492.00
01/22/2025	DXS	B190	Research and analyze case law and related authority relating to KEIPs (2.3); review and analysis of company financials for purposes of assessing KEIPs (.8); attention to drafting of KEIP motion (1.7); review of and revisions to agenda and review of preliminary hearing binder for hearings on January 28, 2025 (.6)	5.40	615.00	3,321.00
01/22/2025	JNK	B190	prepare preliminary hearing agenda for second day hearing, sale and bid procedure hearing, and hearing on various other motions (1.3); prepare draft of final DIP Order (2.8); revise OCP list with monthly caps (0.4); communications with client re OCP list payments (0.2)	4.70	485.00	2,279.50

01/22/2025	SEW	B190	Meeting with M. Roeschenthaler and internal team regarding outstanding matters, concerns to be resolved, and additional strategic discussion for overall matter	0.80	575.00	460.00
01/22/2025	SEW	B190	Assist with preparation for second day / sale hearings and confer with D. Schimizzi and J. Kelly regarding same	0.70	575.00	402.50
01/22/2025	SEW	B190	Attention to emails regarding UST's outstanding objections and concerns related to first day motions and confer with internal team regarding same	0.30	575.00	172.50
01/23/2025	DXS	B190	Continue research and analysis of issues relating to KEIPs and continue drafting and revising motion for approval of the same	1.20	615.00	738.00
01/23/2025	JNK	B190	Revise supplemental OCP list (0.3); communications re OCP list with client (0.2); discussions with counsel team regarding KEIP motion (0.4)	0.90	485.00	436.50
01/23/2025	JNK	B190	Research applicable caselaw relating to section 345 waivers.	2.50	485.00	1,212.50
01/23/2025	SEW	B190	Phone call with M. Lindsay and the UST regarding concerns pertaining to cash management motion (.4), then confer with M. Lindsay regarding same and discuss research matters related to same with J. Kelly	0.90	575.00	517.50
01/24/2025	DXS	B190	Continue research and analysis of authority relating to approval of KEIP for inclusion in motion regarding the same (1.8); continue drafting and revising motion for approval of KEIP and correspondence with Debtors' professionals regarding the same (3.1)	4.90	615.00	3,013.50
01/24/2025	DXS	B190	review of supplement to hearing binder and correspondence with L. Lescalette regarding the same (.4)	0.40	615.00	246.00
01/24/2025	JNK	B190	Review/analysis UST objection to cash management final order (0.5); Discuss 345 waiver research with S. Wenrich and prepare memorandum relating to same (0.6); revise OCP order per UST comments (0.3); prepare final agenda for 1/28 hearing (0.3)	1.70	485.00	824.50
01/24/2025	KJL	B190	Attention to US Trustee's Objections to Debtors' Cash Management Motion	0.50	875.00	437.50
01/24/2025	MJR	B190	Correspond with committee counsel regarding sale and DIP issues (0.3); correspond with counsel for DIP lender and KeyBank regarding same and related issues (.8); follow up regarding issues raised by case parties relating to final relief (1.3)	2.40	860.00	2,064.00

01/24/2025	SEW	B190	Review and analyze UST's objection to cash management motion (.2), begin research pertaining to same (1.2) and confer with J. Kelly and M. Lindsay regarding content of potential reply to same (.2)	1.60	575.00	920.00
01/25/2025	SEW	B190	Drafting reply to UST's objection to cash management motion	1.10	575.00	632.50
01/26/2025	SEW	B190	Continue draft reply to UST objection and send email to D. Schimizzi, M. Lindsay, and J. Kelly regarding potential concerns pertaining to same	1.00	575.00	575.00
01/27/2025	DXS	B190	Attention to preparation of amended final agenda and incorporate revisions to the same from Debtors' professionals	0.80	615.00	492.00
01/27/2025	JNK	B190	Review/revise Reply to UST Objection to Cash Management Motion (0.8); discuss revised reply with RFL team (0.3); prepare client declaration in support of cash management motion (1.2); discussion declaration and revisions with M. Lindsay (0.3); revise final order to critical vendor motion (0.4); prepare and finalize certification of counsel for critical vendor order (0.3).	3.30	485.00	1,600.50
01/27/2025	JNK	B190	Discussion with M. Lindsay and M. Roeschenthaler relating to objections to final DIP Order (0.3); analysis of bid protections (0.4)	0.70	485.00	339.50
01/27/2025	MAL	B190	Meetings, emails and communications and attention to resolution of various first day motion matters and other motions scheduled for hearings and prepare for final first day hearings.	7.50	780.00	5,850.00
01/27/2025	SEW	B190	Assist in preparation for final hearing on second day motions and additional motions, including completing additional research and analysis on outstanding issues and preparing various pleadings, conferences with internal team regarding certain objections, reviewing and finalizing documents related to hearing, and conferences with internal team regarding strategy and tasks related to same	5.50	575.00	3,162.50
01/28/2025	DXS	B190	Meetings with Debtors' professionals regarding final first day hearings (.5); Prepare for and attend final first day hearings (4.1)	4.60	615.00	2,829.00
01/28/2025	JNK	B190	Preparation for final hearing on first day motions (1.0); attend final hearing on first day motions (2.3); revise final DIP order and redline to include court's comments (0.4); discussions with M. Lindsay re additional revisions to DIP order (0.2)	3.90	485.00	1,891.50

01/28/2025	MAL	B190	Finalize various proposed final orders, prepare for and attend final hearings on first day motions and sale and bidding procedures.	4.10	780.00	3,198.00
01/28/2025	MJR	B190	Prepare for and participate in second day hearings, including, review of revised orders, communications with case parties, communications with RFL, BDO and client	5.60	860.00	4,816.00
01/28/2025	SEW	B190	Assist in preparation for hearing and confer with M. Lindsay regarding outstanding matters (.8) and attend hearing via zoom on Cash Management Motion, DIP Motion, and Bid Procedures Order with attention toward necessary revisions to final motions and outstanding matters (2.4)	3.20	575.00	1,840.00
01/29/2025	DXS	B190	Review and analysis of terms for proposed KEIP and correspondence with M. Lindsay regarding the same (.6); continue drafting motion to approve KEIP (1.1)	1.70	615.00	1,045.50
01/30/2025	MAL	B190	Review and discussions regarding NOL Motion Notice requirements and process	0.60	780.00	468.00
01/17/2025	KEW	B200	Review Killinger Complaint, analyze claims included in that complaint and prepare summary for Roeschenthaler and Lund	1.60	910.00	1,456.00
01/07/2025	HAR	B205	Attention to suggestion of bankruptcy for western district of PA pending litigation	0.40	665.00	266.00
01/10/2025	HAR	B205	Review/Analyze litigation list (.4); Discuss strategy with J. Nelms (.2)	0.60	665.00	399.00
01/08/2025	MJR	B210	Attention to insurance issues and correspondence with L. Bubala	0.40	860.00	344.00
01/10/2025	KJL	B210	Confer with K. Herrigan regarding storage of data post-bankruptcy and other operational issues	0.40	875.00	350.00
01/11/2025	MJR	B210	Respond to client inquiry	0.10	860.00	86.00
01/12/2025	MJR	B210	Calls and correspondence regarding recent operational issues and sale issues	1.60	860.00	1,376.00
01/13/2025	MAL	B210	Review correspondence and contract documents from equipment lessor.	0.70	780.00	546.00
01/13/2025	MAL	B210	Telephone conference with insurance broker regarding worker's compensation policy and issues and research regarding worker's compensation policy claims and pre-petition fund held by insurer.	1.60	780.00	1,248.00
01/13/2025	MJR	B210	Respond to client inquiries	1.00	860.00	860.00
01/13/2025	MJR	B210	Attention to environmental issues and correspond with counsel for DEP	0.20	860.00	172.00

01/13/2025	MJR	B210	Insurance call with client	0.20	860.00	172.00
01/13/2025	MJR	B210	Attention to operational issues	1.40	860.00	1,204.00
01/13/2025	SEW	B210	Confer with BDO and internal team regarding critical vendors and inquiries pertaining to same	0.30	575.00	172.50
01/14/2025	MAL	B210	Telephone conference with K. Harrigan regarding and review of Alpha coal supply contract and critical vendor agreements.	1.00	780.00	780.00
01/14/2025	MAL	B210	Telephone calls and emails regarding and attention to details of equipment rental agreements.	0.80	780.00	624.00
01/14/2025	MAL	B210	Telephone conference with financial advisor regarding status of various outstanding issues, tasks and strategy issues.	0.80	780.00	624.00
01/14/2025	MJR	B210	Respond to inquiries by client and creditors regarding operational matters and case issues	1.60	860.00	1,376.00
01/14/2025	SEW	B210	Correspondence with BDO and Kevin Harrigan regarding critical vendor agreements and review and analyze same (.3); confer internally regarding additional proposed critical vendor payments and logistics pertaining to same and advise client regarding same (.8); advise clients regarding certain communications with vendors (.3); and analyze counterproposal of vendor and assist in negotiations pertaining to same (.4)	1.80	575.00	1,035.00
01/15/2025	MAL	B210	Emails and discussions with various vendors and equipment lease counterparties regarding ongoing services	0.70	780.00	546.00
01/15/2025	MAL	B210	Telephone conference with financial advisor regarding environmental orders and issues	0.50	780.00	390.00
01/15/2025	MAL	B210	Telephone conference with financial advisor regarding analysis of NOL carryforwards and review of same.	0.80	780.00	624.00
01/15/2025	MJR	B210	Calls and communications with client and creditors regarding claims issues and operations	3.80	860.00	3,268.00
01/15/2025	MJR	B210	Additional follow up regarding operation issues, DEP issues, sale issues and upcoming filings	1.80	860.00	1,548.00
01/16/2025	MAL	B210	Emails and telephone call with counsel for potential bidder regarding supply relationship and asset sale details	0.70	780.00	546.00
01/16/2025	MAL	B210	Research and review employee-related issues, procedures and interplay with bankruptcy provisions.	1.20	780.00	936.00

01/16/2025	MAL	B210	Research and review consignment issues, telephone conference with consignment creditor and emails and discussions with client and UST regarding same and critical vendor approval.	2.10	780.00	1,638.00
01/16/2025	MAL	B210	Telephone conference with financial advisor regarding cash flow, payments outstanding and budget planning.	0.50	780.00	390.00
01/16/2025	MAL	B210	Review DEP COA and communications with Debtors regarding civil penalty payments.	0.60	780.00	468.00
01/16/2025	MAL	B210	Telephone conference with financial advisor team regarding analysis and treatment of NOLs.	0.50	780.00	390.00
01/16/2025	MJR	B210	Correspond with client regarding recent events (0.3); call with Canadian counsel regarding same (0.1)	0.40	860.00	344.00
01/17/2025	MAL	B210	Review updated research re employee issues and conference with J. Kelly regarding same.	0.80	780.00	624.00
01/17/2025	MAL	B210	Telephone conference with K. Harrigan regarding status of various vendor relationships and strategy	0.50	780.00	390.00
01/17/2025	MJR	B210	Call with DEP and correspond with client regarding same	0.40	860.00	344.00
01/18/2025	MAL	B210	Emails and telephone calls regarding invoice financing/account purchase arrangements and status.	0.70	780.00	546.00
01/18/2025	MAL	B210	Emails regarding and review of worker's compensation policy and post-petition invoicing details.	1.10	780.00	858.00
01/19/2025	MJR	B210	Communications with BDO regarding KEIP and board call	0.30	860.00	258.00
01/20/2025	SEW	B210	Trade emails with M. Lindsay regarding bond documents and initial review of same	0.30	575.00	172.50
01/21/2025	MJR	B210	Correspond with client regarding insurance issues	0.20	860.00	172.00
01/21/2025	MJR	B210	Attention to surety/bonding issues, including review of analysis relating to permits and related obligations and potential options (2.9); correspond with surety counsel regarding same (0.2)	3.10	860.00	2,666.00
01/22/2025	KJL	B210	Attention to calls and emails regarding MSHA follow up investigation of the January 10 Acosta incident	0.80	875.00	700.00
01/22/2025	MJR	B210	Prepare for and participate in call with DEP and surety (0.5); follow up call with counsel for surety (0.1)	0.60	860.00	516.00
01/23/2025	SEW	B210	Complete research pertaining to environmental concerns (2.1), analyze pertinent internal documents and draft memorandum regarding same (1.3)	3.40	575.00	1,955.00

01/23/2025	SEW	B210	Review documents provided by clients and compile documents related to environmental trust	0.20	575.00	115.00
01/24/2025	SEW	B210	Review, analyze, and summarize agreements and related documents pertaining to water treatment and send email to M. Lindsay and M. Roeschenthaler regarding same	1.60	575.00	920.00
01/27/2025	MJR	B210	Correspond with D. Waxman regarding trustee objection to bank accounts motion	0.10	860.00	86.00
01/29/2025	MAL	B210	Review LSQ agreements and attention to outstanding issues and dispute regarding payment.	0.80	780.00	624.00
01/29/2025	MAL	B210	Telephone call with K. Harrigan regarding post-petition vendors and issues regarding supply and payment.	0.50	780.00	390.00
01/29/2025	MAL	B210	Review DEP correspondence and conference with K. Lund regarding DEP issues and potential stipulation to address permitting.	1.00	780.00	780.00
01/31/2025	SEW	B210	Confer with K. Lund regarding stipulation and revise same	0.50	575.00	287.50
01/24/2025	MJR	B220	Discuss KEIP with D. Schimizzi	0.20	860.00	172.00
01/06/2025	SEW	B230	Review and analyze revisions to DIP motion made by D. Schimizzi and make additional revisions to DIP Motion in accordance with revised interim DIP Order and comments received from M. Roeschenthaler	4.20	575.00	2,415.00
01/06/2025	SEW	B230	Finalize DIP motion and confirm accuracy of references to the Interim Order and pull related authority	1.70	575.00	977.50
01/07/2025	JDN	B230	Researching issues for response to UST (re: DIP Motion and DIP Order)	1.10	425.00	467.50
01/07/2025	KJL	B230	Attention to email communications from counsel for Indemnity National Ins. Co. regarding proposed revisions to Interim DIP Order and review bonding agreements as to same	1.40	875.00	1,225.00
01/07/2025	MJR	B230	Call relating to LSQ and related follow up	0.80	860.00	688.00
01/07/2025	SEW	B230	Analysis of material terms in the DIP Facility in relation to the DIP Interim Order and Motion and confer with M. Lindsay regarding same	2.20	575.00	1,265.00
01/08/2025	SEW	B230	Attention to matters pertaining to Interim DIP order and finalization of same	0.40	575.00	230.00
01/08/2025	SEW	B230	Correspondence with various parties, including DIP lender, regarding status of DIP order and interim funding	0.20	575.00	115.00

01/08/2025	SEW	B230	Correspondence with DIP Lender and internal team regarding status of DIP Order	0.20	575.00	115.00
01/09/2025	MJR	B230	Attention to financing issues and call with client regarding same	0.80	860.00	688.00
01/17/2025	MAL	B230	Telephone conference with financial advisor regarding receipts and payments and status of budget and review variance chart and email to DIP Lender re same.	1.00	780.00	780.00
01/18/2025	MAL	B230	Review DIP Motion and Interim Order and various discussions and emails regarding Motion and potential changes to order in response to inquiries from interested parties.	1.40	780.00	1,092.00
01/22/2025	MJR	B230	RFL status call and related follow up (.8); calls and correspondence regarding final DIP budget and review of the same (0.7)	1.50	860.00	1,290.00
01/23/2025	DXS	B230	Review and analysis of objection of the Committee to DIP financing and analysis of authority in support of the same	1.10	615.00	676.50
01/23/2025	MJR	B230	Analysis of final DIP budget and call with BDO regarding same	0.60	860.00	516.00
01/24/2025	MJR	B230	Correspondence with case parties regarding DIP financing	0.60	860.00	516.00
01/24/2025	MJR	B230	Calls with counsel for DIP lender	0.40	860.00	344.00
01/26/2025	MJR	B230	Correspond with RFL team members regarding DIP and upcoming hearings (0.2); correspond with counsel for committee regarding DIP (0.1); correspond with counsel for DIP lender (0.1); correspond with counsel for Keybank regarding DIP status (0.2)	0.60	860.00	516.00
01/27/2025	KJL	B230	Attention to Official Committee of Unsecured Creditors Limited Objection to the Debtors' Emergency Motion for DIP Financing (.5); attention to Bill Miller Equipment Sales, Inc.'s Brief in Opposition to Sale Motion (.4); confer with M. Roeschenthaler and M. Lindsay regarding preparation for final hearing on Debtors First Day Motions (.4); attention to Agenda for final hearing and dial instructions (.3)	1.60	875.00	1,400.00
01/27/2025	MJR	B230	Discussion with M. Lindsay regarding DIP issues and other inquiries by case parties and follow up regarding same	1.20	860.00	1,032.00
01/27/2025	MJR	B230	Call with M. Lindsay and committee counsel regarding DIP	0.20	860.00	172.00
01/28/2025	KJL	B230	Prepare for and attend by zoom Final Hearing on Debtors' First Day Motions, including Final DIP Order and Bid Procedures Motion	3.40	875.00	2,975.00
01/28/2025	MAL	B230	Revise and finalize Final DIP Order and various communications with counsel regarding same	2.10	780.00	1,638.00

01/30/2025	MAL	B230	Review updated DIP budget and various discussions regarding same and sale timeline planning.	1.20	780.00	936.00
01/21/2025	KJL	B235	Analysis of drafts of the Debtor's SOAL Schedules schedules and supporting documentation from BDO (3.7); conference call with M. Lindsay regarding same (.4) analysis of Certified Machinery & Equipment Appraisal Report dated January 1, 2025 Appraisal Report for Various Coal Interests Pennsylvania and Maryland of Corsa Coal Corp. dated September 19, 2024 (.6); prepare email communication regarding same (.7)	5.40	875.00	4,725.00
01/22/2025	KJL	B235	Analysis of drafts of the Debtor's SOFA filings and supporting documentation (4.4); prepare email communications to request revisions to Debtors' SOFA and Schedule filings (.7)	5.10	875.00	4,462.50
01/16/2025	MJR	B240	Participate in NOL call with BDO	0.40	860.00	344.00
01/23/2025	MJR	B240	Call regarding NOLs with client and BDO	0.40	860.00	344.00
01/23/2025	MJR	B240	Attention to NOL issues and cash modeling and calls with BDO regarding same	2.10	860.00	1,806.00
01/08/2025	TAR	B250	Research relating to lease issues	1.40	670.00	938.00
01/13/2025	KJL	B250	Analysis of contract and lease issues	0.50	875.00	437.50
01/24/2025	MJR	B250	Attention to bond issues and inquires of the DEP (0.6); discussion with client regarding Casselman bond (0.1); follow up with surety regarding new bond (0.2); discuss bond issues and environmental issues with K. Lund (0.2)	1.10	860.00	946.00
01/25/2025	MJR	B250	Correspond with D. Waxman regarding bond issues (0.1); correspond with client regarding same (0.1)	0.20	860.00	172.00
01/19/2025	MJR	B260	Prepare for and participate in board call	1.20	860.00	1,032.00
01/27/2025	MJR	B260	Respond to board inquiry	0.10	860.00	86.00
01/29/2025	MJR	B260	Prepare update for board	0.40	860.00	344.00
01/09/2025	MAL	B310	Research and review regarding ongoing environmental obligations and issues.	1.80	780.00	1,404.00
01/09/2025	MJR	B310	Call with BDO regarding claims management	0.30	860.00	258.00

01/13/2025	KJL	B310	Analysis of internal incident report (.9); prepare email addressing water treatment trusts (.5)	1.40	875.00	1,225.00
01/14/2025	DXS	B310	Review and revise proposed claim form and correspondence with M. Roeschenthaler and Omni regarding the same	0.30	615.00	184.50
01/22/2025	MJR	B310	Attention to creditor issues, potential global resolution of DEP issues and other operational issues	4.30	860.00	3,698.00
01/22/2025	SEW	B310	Research regarding regulatory exemptions to the automatic stay and review and analyze invoices pertaining to same	2.80	575.00	1,610.00
01/24/2025	MJR	B310	Discuss DEP issues with K. Lund and analysis of potential structure for forfeiture process and global resolution	2.60	860.00	2,236.00
01/27/2025	HAR	B310	Receive and review reclamation claim demand	0.20	665.00	133.00
01/30/2025	MAL	B310	Review EEOC charge and initial research regarding administration of same	0.80	780.00	624.00
01/23/2025	MJR	B320	Attention to and analysis of sale and restructuring options, including, without limitation sale alternatives	3.40	860.00	2,924.00
01/09/2025	MJR	B410	Calls and communications with client and board	1.10	860.00	946.00
01/15/2025	GBS	E124	Discussion with Mike Roeschenthaler regarding potential plan alternative	0.80	925.00	740.00

Sub-total Fees: \$538,672.00

Expenses

01/06/2025	Chase Card Services: Pennsylvania Western Bankruptcy Court - Filing fees for Chapter 11 bankruptcies					19,118.00
01/13/2025	FedEx: 20250106, Delivered Jeffrey Deller - 2552 Kalakaua Avenue/Marriot Resort and Spa; Invoice # 873771771					242.47
01/17/2025	Postage					2.50
01/26/2025	Chase Card Services: 1/10/2025 - USBC Western District of PA - Certified Copy of a Court Order in Corsa					14.00
01/26/2025	Chase Card Services: 1/16/2025 - PA Western Bankruptcy Court - Filing fee for the Motion to Sale					199.00
01/26/2025	Chase Card Services: 1/4/2025 - PA BCCO - Fees for search for liens					357.00
01/26/2025	Chase Card Services: 1/9/2025 - Genoa Pizza - Lunch for attorneys and client after First Day Hearings					122.90

Sub-total Expenses: \$20,055.87

Total Current Billing: \$558,727.87
Total Now Due: \$558,727.87

Rate Summary

Jordan N. Kelly	91.80 hours at \$485.00/hr	\$44,523.00
Lela Lescalette	2.40 hours at \$375.00/hr	\$900.00
Mark A. Lindsay	127.10 hours at \$780.00/hr	\$99,138.00
Kenneth J. Lund	81.20 hours at \$875.00/hr	\$71,050.00
Jesse D. Nelms	41.70 hours at \$425.00/hr	\$17,722.50
Harry A. Readshaw	41.20 hours at \$665.00/hr	\$27,398.00
Michael J. Roeschenthaler	137.40 hours at \$860.00/hr	\$118,164.00
Tina A. Roeschenthaler	53.90 hours at \$670.00/hr	\$36,113.00
Daniel R. Schimizzi	97.00 hours at \$615.00/hr	\$59,655.00
Gregg B. Shulklapper	0.80 hours at \$925.00/hr	\$740.00
Sarah Wenrich	107.50 hours at \$575.00/hr	\$61,812.50
Keith E. Whitson	1.60 hours at \$910.00/hr	\$1,456.00
Total hours:	783.60	\$538,672.00

Trust Account

	Beginning Balance	\$0.00
01/13/2025	Transfer From Matter 8227-001 Entry No 132868	20,000.00
	Ending Balance:	\$20,000.00

**Monthly Fee Statement of Raines Feldman Littrell, LLP for
the Period of February 1, 2024 through February 28, 2025**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related to Document No.: 164 & 229
v.	Hearing Date: April 24, 2025
NO RESPONDENT.	Hearing Time: 11:00 AM (EST)
	Response Deadline: March 28, 2025 at 4:00 p.m. EST

**MONTHLY FEE STATEMENT OF RAINES FELDMAN LITTRELL, LLP, FOR THE
PERIOD FROM FEBRUARY 1, 2025 THROUGH FEBRUARY, 2025 AND PORTIONS
OF JANUARY 20, 2025 THROUGH JANUARY 26, 2025**

Name of applicant:	Raines Feldman Littrell, LLP
Authorized to provide professional services to:	The Debtors
Petition Date:	January 6, 2025
Date of Retention:	January 28, 2025, effective as of January 6, 2025, see Doc. No. 192
This is a	Fee Statement
Period for which compensation and reimbursement are sought:	February 1, 2025, through February 28, 2025 and portions of January 20, 2025 through January 26, 2025

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors' address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

Amount of compensation sought as actual, reasonable, and necessary: \$262,573.60 (representing 80% of the total fees of \$328,217.00)

Amount of expense reimbursement sought as actual, reasonable, and necessary: \$0

Blended hourly rate for this fee statement: \$706.45

SUMMARY OF PRIOR MONTHLY FEE APPLICATIONS

DATE FILED	PERIOD COVERED	REQUESTED		UNOPPOSED		PAID		HOLDBACK FEES
		FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES	
02/12/2025	01/06/2025 - 01/31/2025	\$430,937.60 (80% of \$538,672.00)	\$20,055.87	\$430,937.60	\$20,055.87	\$430,937.60	\$20,055.87	\$107,734.40
	Totals:	\$430,937.60	\$20,055.87	\$20,055.87	\$20,055.87	\$430,937.60	\$20,055.87	\$107,734.40

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

DATE FILED	PERIOD COVERED	ORDER ENTERED	REQUESTED		ALLOWED		PAID	
			FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES
N/A								
		Totals:						

COMPENSATION BY PROFESSIONAL

The attorneys who rendered professional services in these Chapter 11 Cases from January 20, 2025, through January 26, 2025 and February 1, 2025 through February 28, 2025 (the “Fee Period”), are:

NAME OF PROFESSIONAL	POSITION	DEPT.	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Michael J. Roeschenthaler	Partner	Bankruptcy	2001	\$860.00	47.0	\$40,420.00
Kenneth J. Lund	Partner	Bankruptcy	1991	\$875.00	26.1	\$22,837.50
Daniel R. Schimizzi	Partner	Bankruptcy	2011	\$615.00	71.3	\$43,849.50
Ronald W. Crouch	Counsel	Bankruptcy	1981	\$825.00	7.6	\$6,270.00
Mark A. Lindsay	Counsel	Bankruptcy	2002	\$780.00	188.7 ¹	\$147,186.00
Harry A. Readshaw	Counsel	Bankruptcy	2006	\$665.00	1.7	\$1,130.50
Tina A. Roeschenthaler	Counsel	Bankruptcy	2001	\$670.00	13.9	\$9,313.00
Sarah E. Wenrich	Associate	Bankruptcy	2018	\$575.00	56.0	\$32,200.00
Jordan N. Kelly	Associate	Bankruptcy	2020	\$485.00	46.8	\$22,698.00
Jesse D. Nelms	Associate	Bankruptcy	2024	\$425.00	5.0	\$2,125.00
Total for Attorneys:					464.6	\$328,217.00

The paraprofessionals and other staff who rendered professional services in these Chapter 11 Cases during the Fee Period are:

NAME OF PARAPROFESSIONAL OR STAFF MEMBER	POSITION	DEPT.	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Lela M. Lescallette	Paralegal	Bankruptcy	\$375.00	0.5	\$187.50
Total for Paraprofessionals and Other Staff:					\$187.50

COMPENSATION BY PROFESSIONAL CATEGORY

¹ A portion of Mr. Lindsay’s time from January 20, 2025 through January 26, 2025 was inadvertently left out of the Debtors’ January Fee Statement [Doc. No. 229] and has been added hereto.

PROFESSIONALS	BLENDED RATE	TOTAL HOURS	TOTAL COMPENSATION
Partners	\$741.74	144.4	\$107,107.00
Counsel	\$773.48	211.9	\$163,899.50
Associates	\$528.97	107.8	\$57,023.00
Paraprofessionals	\$93.75	0.5	\$187.50
Blended Hourly Rate/Total Fees	\$706.45	464.6	\$328,217.00
Less 20% Holdback			\$65,6543.40
Total Adjusted Fees Requested			\$262,573.60

COMPENSATION BY PROJECT CATEGORY FOR WORK

NO.	PROJECT CATEGORY	TOTAL HOURS BILLED	TOTAL COMPENSATION
B110	Case Administration	37.6	\$28,627.00
B120	Asset Analysis and Recovery	13.8	\$7,406.50
B130	Asset Disposition	98.6	\$74,837.00
B140	Relief from Stay/Adequate Protection Proceedings	0.8	\$700.00
B150	Meetings and Communications with Creditors	7.1	\$5,284.00
B160	Fee Applications/ Objections	4.6	\$2,582.00
B170	Employment Applications and Objections	10.2	\$6,290.00
B185	Assumption / Rejection of Leases and Contracts	20.6	\$13,148.00
B190	Other Contested Matters and Omnibus Hearings	115.9	\$72,787.50
B200	Adversary Actions	1.8	\$1,575.00
B210	Business Operations	64.6	\$50,516.50
B220	Employee Benefits / Pensions	0.4	\$350.00
B230	Financing/Cash Collateral	19.9	\$14,504.50
B260	Board of Directors Matters	5.7	\$3,579.00
B310	Claim Administration and Objections	20.6	\$15,638.50
B320	Plan and Disclosure Statement	42.4	\$30,391.50

	TOTAL:	464.6	\$328,217.00
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ITEMIZED EXPENSES

EXPENSE DESCRIPTION	DATE	EXPENSE AMOUNT
N/A		
TOTAL:		

Pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, rule 2016 of the Federal Rules of Bankruptcy Procedure, rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Western District of Pennsylvania, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [Doc. No. 164] (the “Interim Compensation Order”), Raines Feldman Littrell, LLP (“Raines”), counsel for Debtors, hereby files this monthly fee statement relating to compensation for professional services rendered to the Debtors and for reimbursement of actual and necessary expenses incurred in connection therewith for the period commencing January 20, 2025 through January 26, 2025 and February 1, 2025, through and including February 28, 2025 (the “Fee Period”), and requests authorization, in accordance with the Interim Compensation Order, to be paid by the Debtors in the aggregate amount of \$262,573.60, representing 80% of the total amount of fees of \$328,217.00 and 100% of the expenses of \$0 incurred during the Fee Period. Copies of Raines’ itemized time records for professionals and paraprofessionals performing services for the Debtors during the Fee Period are attached hereto as **Exhibit A**.

Respectfully submitted,

Dated: March 14, 2025

RAINES FELDMAN LITRELL, LLP

By: /s/ Michael J. Roeschenthaler

Michael J. Roeschenthaler (PA ID No. 87647)

Kenneth J. Lund (PA ID No. 63468)

Mark A. Lindsay (PA ID No. 89487)

Daniel R. Schimizzi (PA ID No. 311869)

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Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Itemized Time Records by Project Category



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

Invoice Date: 3/13/2025
Invoice Number: 131460

Corsa Coal, Corp. et al
Kevin M. Harrigan, President and CEO
1576 Storystown Road
PO Box 260
Friedens, PA 15541

8227-002 / Corsa Bankruptcy

Professional Services		Hours
01/20/2025 MAL	Review environmental obligations details and consider issues and disclosures for schedules and sofas.	1.20
01/20/2025 MAL	Executory contract review, review contract summaries and analyses regarding same.	2.00
01/20/2025 MAL	Conference with S. Wenrich regarding contract and vendor agreement review and analysis and various communications regarding same.	1.10
01/20/2025 MAL	Review various post-petition invoices and emails regarding payments and communications with vendors and counsel.	1.00
01/20/2025 MAL	Review updated DIP budget compared with actuals, emails with equipment lender's counsel regarding DIP Order and agreement regarding post-petition liens with DIP Lender and review of DIP Order lien provisions.	1.80
01/20/2025 MAL	Review surety bond agreement, account control agreement and related documentation and attention to issues regarding collateral and post-petition obligations.	1.60
01/21/2025 MAL	Review and analysis of documents and financial data for schedules and statements of financial affairs preparation.	2.60
01/21/2025 MAL	Telephone call and emails with committee counsel regarding case status and issues.	0.80
01/21/2025 MAL	Multiple telephone conferences, emails and attention to first day final hearings and bidding procedures hearing.	4.50
01/21/2025 MAL	Various discussions with creditors and client regarding critical vendor issues and post-petition service.	1.80

01/22/2025	MAL	Communications with US Trustee regarding and review of language in retention application and order.	0.50
01/22/2025	MAL	Review potential executory contract list and initial cure estimates and meetings with S. Wenrich regarding same.	0.70
01/22/2025	MAL	Review and comment on draft schedules and statements of financial affairs and various meetings and communications regarding same.	2.20
01/22/2025	MAL	Various communications with and review of claims information for various creditors and critical vendor requests.	1.80
01/22/2025	MAL	Review and attention to additional UST comments and requests regarding final first day hearings and proposed orders.	0.80
01/22/2025	MAL	Telephone conference and communications with committee counsel and provide certain creditor data.	1.00
01/23/2025	MAL	Review and revise draft Final DIP Order, review various comments and informal objections and internal conferences regarding same	2.60
01/23/2025	MAL	Conferences with DRS and review of research regarding potential KEIP issues and requests.	1.20
01/23/2025	MAL	Various discussions with client regarding ordinary course professional issues, revise order for approval and communications with UST regarding same.	1.10
01/23/2025	MAL	Meetings with S. Wenrich and research regarding environmental obligations and disclosures and review company historical information	1.70
01/23/2025	MAL	Review comments and objections to multiple pending pleadings and telephone conference and various emails with UST Office regarding various first day motions	1.60
01/23/2025	MAL	Analyze updated DIP budget and discussions with MJR and financial advisor regarding same.	0.80
01/23/2025	MAL	Telephone call with BDO team regarding NOL issues and strategy and review data regarding same.	0.80
01/23/2025	MAL	Discussions and emails with various creditors re critical vendor status and issues.	1.00
01/24/2025	MAL	Various telephone calls and review of documents with creditors and counsel regarding claims, critical vendor order and post-petition services.	2.10
01/24/2025	MAL	Review revised retention application and pre-petition retainer analysis and communications with UST regarding same.	1.20
01/24/2025	MAL	Review environmental violation notices and existing consent order agreements.	0.80

01/24/2025	MAL	Various discussions regarding and attention to final first day orders, comments to same and review of UST objections.	1.80
01/24/2025	MAL	Review revised schedules and statements of financial affairs for all debtors.	1.80
01/24/2025	MAL	Conference with Omni and BDO to review and revise draft Schedules and statements of financial affairs.	2.00
01/24/2025	MAL	Review and revise draft final DIP Order and communications with DIP Lender and other interested parties regarding changes.	1.30
01/25/2025	MAL	Review and revise amended Final DIP Order and comments from parties in interest and various emails regarding same.	1.00
01/26/2025	MAL	Review and revise final DIP Order and various communications with interested parties regarding same.	2.30
02/01/2025	MAL	Review and revise various schedules and sofas.	2.00
02/02/2025	SEW	Trade emails with BDO regarding revisions to contract assumption and assignment schedule	0.20
02/03/2025	SEW	Draft notice of contracts and leases that may be assumed and assigned (.1) and confer with M. Lindsay regarding status of related schedule and outstanding issues (.3), Trade emails with K. Harrigan regarding additional leases to be included and review and analyze information pertaining to same and update current version of schedule (1.1) and correspondence with K. Harrigan, BDO, and M. Lindsay regarding revisions to and finalization of same (.8); review updated schedule and instruct BDO on final revisions to same (.3); review and analyze final version of Schedule 1 to ensure accuracy (.2), finalize and file notice with Schedule 1 (.2), and instruct Omni on service of same (.2)	3.20
02/03/2025	SEW	Confer with M. Lindsay regarding deadlines in the Bid Procedures Order and outstanding issues (.2), review and revise Sale and Auction notice, then coordinate filing of same (.2), and review bid procedures and instruct and trade emails with Omni regarding service of same (.4)	0.80
02/03/2025	MAL	Review and revise Sale Notice and Contract Notice and amend contract list (2.3); telephone conference with K. Harrigan regarding various contract issues (.6)	2.90
02/03/2025	MJR	Review correspondence regarding creditor inquiries and respond to the same	0.40
02/03/2025	SEW	Confer with M. Lindsay regarding concerns regarding updated schedules (.1), review and analyze updated schedules (.7), trade emails with BDO and client regarding same (.1), and instruct Omni regarding revisions to same (.2)	1.10
02/03/2025	MJR	Respond to DEP inquiries and follow up with other case parties	0.40

02/03/2025	DXS	Correspondence with M. Lindsay regarding status of assumption and assignment notice	0.20
02/04/2025	SEW	Trade emails with BDO and Omni regarding details pertaining to service of the Sale Notice and Contract Assumption Notice	0.40
02/04/2025	KJL	Analysis of Debtor WCE Schedules of Assets and Statement of Financial Affairs (.8); Attention to Notice of Sale of Proposed Sale of Substantially All of the Debtors' Assets, Bidding Procedures, Auction, and Sale Order Hearing (.3)	1.10
02/04/2025	KJL	Attention to notice of executory contracts that may be assigned and assumed in connection with sale transaction	0.50
02/04/2025	SEW	Analysis and review of further updated schedules and SOFA for each Debtor and confer with M. Lindsay regarding remaining issues (1.2); correspondence with Omni and Kevin Harrigan regarding same and finalizing same (.2); analyze and review final updated drafts of schedules and confirm accuracy of same (.6); finalize global notes (.2); instruct L. Lescalette regarding filing of same (.3); confer with M. Lindsay and L. Lescalette regarding corrective entries and updated deadlines pertaining to same (.3)	2.80
02/04/2025	MJR	Calls and correspondence with committee regarding sales procedures (0.3); discuss same with RFL team (0.2); call with client (0.1); follow up regarding same (.7)	1.30
02/04/2025	LL	Format and file completed schedules and statement of financial affairs for all debtors	0.40
02/04/2025	MAL	Review and finalize Schedules and Sofas for filing (1.5); telephone call with client and financial advisor regarding DEP issues and review DEP correspondence (1.2); additional research regarding DEP claims (.7).	3.40
02/04/2025	MJR	Prepare update for board	0.30
02/04/2025	DXS	Review and analysis of proposed KEIP terms and finalize draft of KEIP Motion (2.4); correspondence with M. Lindsay and E. Blum regarding KEIP terms (.3)	2.70
02/04/2025	LL	Review docket and calendar upcoming hearings and deadlines	0.10
02/04/2025	MJR	Attention to DEP issues; confer with client regarding same	1.20
02/04/2025	MJR	Call with client regarding environmental claims	0.50
02/05/2025	MAL	Review utility histories and additional requests from utilities and various discussions regarding same	2.10
02/05/2025	KJL	Confer with D. Schimizzi regarding cease and desist letter and documentation relating to same	0.40
02/05/2025	MAL	Review account history and status, and emails and telephone call with counsel for LSQ	1.30

02/05/2025	JDN	Research and draft short memorandum related to 3rd Circuit standards for approval or disapproval of a KEIP	2.00
02/05/2025	KJL	Analysis of operational issues	1.80
02/05/2025	MAL	Attention to and emails with financial advisors and DIP Lender regarding DIP budget.	0.80
02/05/2025	RWC	Internal discussions and assist with cease and desist letter directed to LCT	1.20
02/05/2025	MJR	Discuss creditor issues, tax issues and DEP issues with RFL team and follow up regarding same	1.10
02/05/2025	KJL	Attention to email correspondence with PA DEP regarding status of Debtors' bonds and permit compliance	0.50
02/05/2025	MAL	Emails and discussions regarding DEP concerns and surety issues and attention to potential stipulation.	1.80
02/05/2025	SEW	Correspondence with D. Schimizzi and L. Lescalette regarding retention issues (.3); correspondences with M. Lindsay and L. Lescalette regarding equity security holders (.2)	0.50
02/05/2025	MAL	Emails and discussions regarding LCT activity and review of confidentiality agreement.	1.50
02/05/2025	DXS	Review of information relating to LCT issue and correspondence with M. Roeschenthaler and M. Lindsay regarding the same (.4); draft, revise, finalize, and send correspondence to K. Burkley regarding LCT issue (2.2)	2.60
02/05/2025	HAR	Analyze issues/strategies regarding creditor's improper use of confidential information	0.40
02/05/2025	MAL	Emails and discussions regarding due diligence site visits	0.80
02/05/2025	SEW	Confer with M. Lindsay and M. Roeschenthaler regarding correspondence from PA DEP and proposed stipulation regarding same	0.30
02/05/2025	MJR	Attention to issues with bidder, including revision to letter and calls to counsel for KeyBank and the Committee	1.10
02/05/2025	MJR	Respond to creditor inquiries	0.60
02/05/2025	MJR	Attend to issues relating to buyer and operational matters	1.10
02/05/2025	MAL	Emails and discussions with S. Wenrich regarding DEP issues and research.	0.70
02/06/2025	DXS	Correspondence with K. Burkley regarding LCT sale issues (.6); follow up with M. Roeschenthaler and M. Lindsay regarding the same (.2)	0.80

02/06/2025	MAL	Conference with D. Schimizzi regarding Key Incentive Program motion and review various data and analyses regarding proper structure of program.	1.50
02/06/2025	SEW	Review and analyze summary of J. Nelms research regarding creditor inquiries	0.20
02/06/2025	SEW	Research and analysis regarding section 525 and PA DEP's threats to forfeit bonds and draft memorandum and analysis regarding same (4.4); correspondence with internal team regarding same (.2)	4.70
02/06/2025	MJR	Discuss open issues with M. Lindsay	0.20
02/07/2025	MAL	Emails and discussions regarding DIP Budget revisions and review of same with variances.	1.00
02/07/2025	MAL	Review bonding and permitting data and draft and revise proposed stipulation regarding DEP bond forfeiture procedures	2.30
02/07/2025	KJL	Finalize Non-Disclosure Agreement with potential purchaser of Corsa assets and prepare email communications regarding same	0.20
02/07/2025	MAL	Review requests from UST regarding retention application and emails with Stikeman regarding same.	0.50
02/07/2025	DXS	Continue drafting KEIP motion and additional research regarding authority for the same (2.1); conference with R. Stovash regarding KEIP and Compensation Committee/Board Approval (.7)	2.80
02/07/2025	SEW	Correspondences with D. Schimizzi regarding KEIP motion and details pertaining to same (.4), then review and analyze relevant documentation and caselaw and continue draft of KEIP motion, including draft of supporting declarations and ancillary documents (4.1)	4.50
02/07/2025	KJL	Analysis of S. Wenrich Legal Memorandum addressing PA DEP's bond forfeiture demand for compliance with the US Bankruptcy Code and prepare email in response to same	1.80
02/08/2025	DXS	Research regarding additional metrics for inclusion in KEIP (1.1); correspondence with Debtors' Professionals regarding status of KEIP (.6)	1.70
02/10/2025	SEW	Research regarding motion to seal (.7), review and analyze local rules and standing orders regarding procedure for filing same and summarize same for internal review (.3), and draft / proofread / revise motion to file exhibit to KEIP motion under seal and send email to D. Schimizzi and M. Lindsay regarding same (2.2)	3.20
02/10/2025	MJR	Draft advertisement for sale	0.80
02/10/2025	SEW	Confer with internal team regarding KEIP motion and related matters (.2) and meeting with BDO and D. Schimizzi regarding same (.3), then review data points provided by BDO related to same (.2)	0.70

02/10/2025	MAL	Telephone conference with LSQ counsel regarding payment status and consider contract termination provisions.	1.20
02/10/2025	MJR	Calls with potential buyers and/or counsel	1.30
02/10/2025	KJL	Prepare indemnity agreement for rail line inspection by potential bidder and prepare email communications with client regarding same	2.20
02/10/2025	DXS	Conference with Debtors' professionals regarding finalizing KEIP terms (.4); further review of and revisions to final draft of KEIP for review by compensation committee and board (.9); correspondence to R. Swanson regarding KEIP terms and process for approval (.5)	1.80
02/10/2025	MJR	Call with client regarding sale process and follow up regarding same	0.40
02/10/2025	SEW	Correspondence with internal team regarding publishing requirements and review local rules pertaining to same (.4), trade emails with Omni regarding publication requirements and instruct Omni regarding same (.2), and internal correspondence and research pertaining to same (.3)	0.90
02/10/2025	MAL	Telephone conference with client group and BDO regarding sale status(.7); various communications regarding sale process and advertising and review of bidding procedures (1.4)	2.10
02/10/2025	MJR	Attention to employee issues and other operational issues	0.40
02/10/2025	JNK	Communications with Stikeman regarding UST questions (0.2); review Stikeman's responses to UST questions (0.2)	0.40
02/10/2025	DXS	Correspondence with client and potential bidders regarding additional information for data room (.5); correspondence with M. Roeschenthaler regarding status of sale efforts (.2)	0.70
02/11/2025	MAL	Telephone conference with Stikeman team regarding status of recognition action and retention application questions	0.50
02/11/2025	MAL	Review and attention to potential bidder information and various discussions regarding sale issues and milestone items.	1.20
02/11/2025	HAR	Analyze reclamation claim and discuss same with M. Lindsay	0.60
02/11/2025	SEW	Review prepetition invoices and begin consideration of potential avoidance actions pertaining to creditor actions	0.40
02/11/2025	DXS	Prepare for and attend conference with Committee professionals regarding case status (.7)	0.70
02/11/2025	MAL	Emails and discussions with H. Readshaw regarding reclamation demand and emails with client regarding same.	0.70

02/11/2025	MAL	Review and make changes to proposed DEP stipulation and emails regarding same	1.10
02/11/2025	JNK	Multiple communications with Stikeman relating to UST requests (0.3); conference call with Stikeman relating to finalize responses to UST requests (0.3)	0.60
02/11/2025	SEW	Review interim compensation order and begin draft of first fee statement	0.60
02/11/2025	MAL	Review retention applications and various emails with UST regarding Stikeman and BDO retention application questions	1.00
02/11/2025	SEW	Review proposed publications and invoices provided by Omni and correspondence with Omni regarding same	0.20
02/11/2025	MAL	Telephone conference with committee counsel and financial advisor regarding sale issues.	0.60
02/11/2025	MJR	Participate in committee call	0.30
02/12/2025	KJL	Prepare Non-Disclosure Agreement for potential bidder for Debtors' assets and attention to email communications regarding same	0.20
02/12/2025	JNK	Communication with consultation parties relating to potential bidder bid requirements (0.2); analysis of bid procedures order and bid procedures relating to participant requirements (0.6); discussions with D. Schimizzi relating to participant requirements (0.3)	1.10
02/12/2025	MJR	Call with surety counsel and DEP and follow up relating to the same, including review of permitting obligations	1.70
02/12/2025	DXS	Conferences with R. Stovash regarding Comp. Committee review of proposed KEIP (1.8); review and revise KEIP per conferences with R. Stovash (.4); conference with the Comp. Committee regarding review of KEIP and follow up correspondence with Debtor's professionals regarding the same (.9)	3.10
02/12/2025	MAL	Telephone conference with counsel for LSQ and review and revise proposed termination agreement	1.00
02/12/2025	MAL	Telephone conference with DEP counsel regarding bonding issues and review and revise proposed consent order	1.50
02/12/2025	HAR	Attention to reclamation demand by LD Water Services/correspondence with opposing counsel regarding the same	0.70
02/12/2025	DXS	Correspondence with Consultation Parties regarding modification to bidding procedures (.4); review of stipulation modifying bidding procedures (.3); correspondence with Consultation Parties regarding issues with potential bidder (.4); correspondence with client regarding bidder issue (.2)	1.30

02/12/2025	MAL	Communications regarding sale process and potential buyer communications with contract parties and potential NDA violations	1.20
02/12/2025	SEW	Review materials and work on fee statement	2.40
02/12/2025	MJR	Call with client regarding DEP issues	0.30
02/12/2025	MAL	Telephone conference with client group regarding DEP bonding issues and general status and strategy	0.70
02/12/2025	SEW	Confer with M. Lindsay regarding correspondence pertaining to lease and review and analyze information pertaining to same	0.20
02/12/2025	MJR	Attention to potential issues with DEP	1.30
02/12/2025	MAL	Telephone call with counsel for Harbor Energy regarding utility motion and agreement and review various information and data regarding service agreements, deposits and usage.	1.70
02/13/2025	MAL	Telephone conference with DEP regarding status of O&M bonding issues	0.50
02/13/2025	SEW	Draft notice of commencement (.2); correspondence with D. Schimizzi and court clerk regarding same (.1); then finalize and file same and instruct Omni on service of same (.1)	0.40
02/13/2025	MJR	Review bid and APA and correspond with BDO, RFL and client regarding same	1.10
02/13/2025	MAL	Telephone conference with financial advisors regarding budget issues (.3); begin review of DIP Lender bid and various conferences regarding same (1.6); review and revise LSQ agreement and emails regarding same (1.1); review of pending retention applications and emails with UST regarding same (.8); discussions with client regarding critical vendor requests and emails with UST regarding same (.7); emails and discussions regarding buyer communications with customers (1.0)	5.50
02/13/2025	MJR	Call with DEP and related follow up with client	0.40
02/13/2025	SEW	Confer with L. Lescalette regarding consolidated creditors matrix and review and approve same for filing	0.20
02/13/2025	SEW	Confer with D. Schimizzi, M. Lindsay and Omni regarding publication of sale notice and confirm details pertaining to same	0.30
02/13/2025	SEW	Revise KEIP motion and draft declarations to reflect changes to overall program and proposed sealing of exhibit (.6), prepare and redact proposed exhibit (.1) and confer with D. Schimizzi regarding same (.1)	0.80
02/13/2025	DXS	Review and analysis of bid letter and redline to APA provided by potential bidder (2.1); correspondence with M. Roeschenthaler and M. Lindsay regarding the same (.5)	2.60

02/14/2025	JNK	Revise application for filing in Canadian proceedings	1.40
02/14/2025	DXS	Review and analysis of LCT Cease and Desist and response thereto (.4); correspondence with client, Debtors' professionals, and consultation parties regarding disqualification of LCT in sale process (.7); draft notice of disqualification and preservation notice (.9); correspondence with client to incorporate revisions thereto and send to counsel for LCT (.4)	2.40
02/14/2025	MAL	Review and finalize LSQ agreement and discussions regarding payments (.8); Review pleadings regarding executory contract issues and review contract terms (2.6); initial review of DEP motion regarding applicability of automatic stay (.5); research regarding mine subsidence act issues (1.5).	5.40
02/14/2025	MAL	Review bid documents and proposed APA from DIP lender and various discussions regarding same	2.10
02/14/2025	SEW	Revise fee statement and review of related materials	0.70
02/14/2025	RWC	Draft preservation/litigation hold letter	1.50
02/14/2025	MJR	Correspond with BDO regarding operational issues and sale and follow up regarding same	1.60
02/14/2025	MJR	Calls to potential buyers	0.40
02/14/2025	JNK	Prepare certifications of counsel relating to Stikeman and BDO retention applications (0.4); prepare notice of filing relating to amended exhibit to BDO application (0.2)	0.60
02/14/2025	DXS	Prepare for and attend board meeting to discuss recent developments in chapter 11 restructuring (1.1)	1.10
02/14/2025	KJL	Finalize Non-Disclosure Agreement with potential bidder for Debtors' assets and prepare email communications regarding same	0.30
02/14/2025	JNK	Prepare preliminary agenda for omnibus hearing	0.40
02/15/2025	DXS	Conference with M. Roeschenthaler, E. Blum, and J. Mahan regarding plan matters	1.00
02/15/2025	MAL	Communications with team and consideration of potential toggle plan structure.	1.10
02/15/2025	MJR	Status call re plan alternative	0.40
02/16/2025	SEW	Review and analyze Penn Coal's motion regarding lease and trade emails with M. Lindsay regarding same	0.40
02/17/2025	MAL	Various emails and attention to utility adequate assurance requests and potential agreements.	1.30

02/17/2025	MJR	Call with potential buyer (0.2); call with client regarding same (0.1)	0.30
02/17/2025	KJL	Analysis of Commonwealth of Pennsylvania Motion for Order regarding Automatic Stay and State's Environmental Laws (.6); confer with M. Lindsay regarding same (.2)	0.80
02/17/2025	JNK	Prepare amended scheduled relating to BDO Retention Application per discussions with M. Lindsay (0.3).	0.30
02/17/2025	KJL	Finalize Non-Disclosure Agreement with potential bidder for Debtors' assets and prepare email communications regarding same	0.40
02/17/2025	DXS	Attention to further review of and revisions to proposed incentive plan per client request and correspondence with client and Debtors' professionals regarding the same	0.70
02/17/2025	JNK	Continued revision to application for recognition of orders and case status to be filed in Canadian recognition proceedings (1.8); discuss application with M. Lindsay (0.3); multiple communications with Stikeman relating to revision to application (0.3)	2.40
02/17/2025	DXS	Conferences with K. Burkley regarding disqualification notice (.4); correspondence with client Debtors' professionals regarding disqualification notice and issues raised in connection with the same (.9); review of information relating to issues raised by LCT and attention to investigation of the same (.8)	2.10
02/17/2025	MAL	Attention to sale process and issues, review updates from financial advisors regarding same and additional review of bid and proposed APA.	3.10
02/17/2025	MAL	Begin potential plan considerations and research regarding same	2.10
02/17/2025	MAL	Review retention app information and various emails with UST regarding same.	0.70
02/18/2025	MAL	Emails and discussions regarding LSQ agreement and review and make revisions to same.	1.50
02/18/2025	MJR	Status call with FA re open matters and plan alternative	0.30
02/18/2025	MAL	Discussions and attention to potential discovery regarding sale process.	0.70
02/18/2025	SEW	Review, and analyze Penn Coal's lease with Wilson Creek Energy and send email summary to M. Lindsay regarding same	0.40
02/18/2025	JNK	Review/revise certificate of no objection relating to Stikeman retention application	0.30
02/18/2025	SEW	Review and analyze PADEP motion and begin research pertaining to same (1.9), then confer with M. Lindsay regarding same (.2)	2.10
02/18/2025	JNK	Research plan issues	0.50

02/18/2025	DXS	Correspondence with Debtors' professionals regarding status of sale efforts (.3)	0.30
02/18/2025	DXS	Review of and revisions to final agenda for matters scheduled for omnibus hearing (.2); Continue review of and revisions to draft of KEIP motion and circulate the same for comment and review by Debtors' professionals (1.8); review of and revisions to declarations in support of KEIP motion and correspondence with declarants regarding the same (.9)	2.90
02/18/2025	MAL	Initial consideration of potential plan structures and various discussions regarding same.	1.20
02/18/2025	SEW	Review internal emails regarding strategy pertaining to potential chapter 11 plan (.1), begin research pertaining to same (2.0), and send email to internal team regarding same (.2)	2.20
02/18/2025	MAL	Various discussions regarding trucking services and issues and review of critical vendor order and agreements.	1.20
02/18/2025	MAL	Various conferences regarding budget and projections and review of same	1.00
02/18/2025	MAL	Review DEP motion, conference with S. Wenrich regarding same and review and analysis of DEP alleged claims.	2.20
02/19/2025	SEW	Preparation for plan of reorganization, including research pertaining to same, and begin drafting same	3.40
02/19/2025	MAL	Various communications regarding LSQ agreement and transfer of funds	0.80
02/19/2025	MAL	Review EEOC claim and conference with J, Kelly regarding response to same	0.80
02/19/2025	MAL	Review Potomac and Penelec adequate assurance requests and various emails and review of account information	0.80
02/19/2025	MJR	Prepare for and participate in status call with BDO and client	0.40
02/19/2025	MAL	Telephone conference with financial advisor team regarding NOL analysis and review of data regarding same and related legal authority.	1.30
02/19/2025	JDN	Review, edit and confirm authorities (re: KEIP Motion)	3.00
02/19/2025	MJR	Attention to lease and override issues	0.40
02/19/2025	MAL	Review draft KEIP motion and conference with D. Schimizzi regarding terms of same	0.80

02/19/2025	DXS	Conference with E. Blum to discuss KEIP motion and related declarations (.6); conference with R. Stovash regarding approval of KEIP and revisions to declaration (.3); further review of and revisions to KEIP Motions and related declarations (.9); further review of and revisions to KEIP Motion based on feedback from client and Debtors' Professionals (.6)	2.40
02/19/2025	DXS	Meeting with R. Crouch to discuss discovery requests relating to LCT issue and prepare summary of issues to R. Crouch	0.60
02/19/2025	MJR	Client calls and communications	0.40
02/19/2025	JNK	Analysis of labor claims and applicability of automatic stay (1.1); discuss research with M. Lindsay (0.3)	1.40
02/19/2025	SEW	Confer with internal team regarding outstanding items and status of same for various aspects of case, including overall strategy	0.40
02/19/2025	RWC	Begin draft of LCT discovery	1.00
02/19/2025	TAR	Correspondence with M. Roeschenthaler on issues related to override payments	0.20
02/19/2025	MAL	Review Somerset Rural Electric request for adequate assurance and various emails and review of utility account information	0.80
02/19/2025	MAL	Telephone conference with counsel to contract party regarding executory contract notice and review subject contract.	0.90
02/19/2025	MAL	Review demand for payment of vendor payables to assignee under factoring agreement and review related UCC filings and terms of agreement.	1.60
02/20/2025	MAL	Review various correspondence from DEP, related environmental claims information and environmental legal authority	1.70
02/20/2025	JNK	Review/revise KEIP motion (0.8); communications with client re labor claim (0.2)	1.00
02/20/2025	MAL	Various emails regarding and review and attention to NOL analysis	0.80
02/20/2025	SEW	Review correspondence from contract counterparty and trade email with M. Lindsay regarding same	0.40
02/20/2025	DXS	Multiple conferences with E. Blum regarding review of and revisions to declaration in support of KEIP Motion (.8); attention to final review of and revisions to KEIP Motions, Declarations, and Proposed Order (1.3); review of and revisions to motion to seal and related order (.6); further revisions to Stovash declaration and correspondence with R. Stovash regarding the same (.9); finalize and file KEIP motion and motion to seal via CM/ECF and correspondence with chambers and Omni regarding service of the same (.7); correspondence with U.S. Trustee, KeyBank, and Committee regarding KEIP motion and motion to seal KEIP (.4)	4.70

02/20/2025	JNK	Research relating to disclosure statement	2.30
02/20/2025	MJR	Attention to operational issues and impact on sale (1.2); correspond with client and BDO (0.4); review related materials and analyze options (1.8)	3.40
02/20/2025	MAL	Telephone conference with client and financial advisors regarding potential plan financing and consider plan structure strategies.	2.50
02/20/2025	JNK	Review/analysis of monthly operating reports for filing.	0.80
02/20/2025	MJR	Calls with client and RFL team members regarding creditor issues	0.40
02/20/2025	SEW	Internal meeting to discuss various developments, related strategy, and delegation of assignments	0.70
02/20/2025	MJR	Call regarding exit financing and related follow up regarding options	0.60
02/20/2025	MAL	Review various correspondence from creditors and contract counterparties and review contract notice and bidding procedures.	1.00
02/20/2025	DXS	Review and revise attorney compensation disclosure and instruct L. Lescalette on filing	0.30
02/20/2025	MAL	Meeting with counsel team to discuss status of multiple pending items and case strategy.	1.00
02/20/2025	SEW	Confer with D. Schimizzi regarding expediting hearing on KEIP motion and related motion to seal, review local rules and forms pertaining to same, make necessary revisions to motions and finalize same	1.00
02/20/2025	MJR	Correspond with case parties regarding sale and upcoming deadlines	0.40
02/20/2025	DXS	Correspondence with client and Debtors' professionals regarding potential exit financing and follow up with M. Roeschenthaler and M. Lindsay regarding the same	0.60
02/20/2025	SEW	Confer with internal team regarding plan and disclosure statement and strategy pertaining to same and continue draft of same	2.30
02/20/2025	JNK	RFL team meeting to discuss case status and strategic responses to pending matters (0.5); review of final DIP order re notice periods (0.4)	0.90
02/21/2025	SEW	Phone call with internal team regarding addition developments relating to PADEP actions and change of method for addressing same (.3) and attention to various emails regarding same (.2)	0.50
02/21/2025	MJR	Correspond with surety counsel regarding recent bond demand	0.20

02/21/2025	MAL	Review DEP correspondence and claim information and various meetings and attention to plan to address and respond to issues with DEP actions.	1.70
02/21/2025	JNK	Attend meeting with RFL team and BDO to discuss case status, pending matters, and case projections (2.8); discuss potential filing relating to misuse of debtor's information with D. Schimizzi and M. Lindsay (0.6)	3.40
02/21/2025	SEW	Compile sale information and create EASI publication	0.40
02/21/2025	DXS	Review information relating to sale issues with potential bidder (.4); conference with Debtors' professionals and client to discuss status of sale and issues caused by potential bidder (.5); attention to preparation of pleading relating to sale issues (1.2)	2.10
02/21/2025	SEW	Finalize review of all monthly operating reports and instruct L. Lescalette on filing of same	0.50
02/21/2025	MJR	Attention to environmental claim issues and review related authority	1.20
02/21/2025	MJR	Research and analysis regarding plan alternative and meeting with BDO with calls to client	5.60
02/21/2025	KJL	Assist with employee matters	0.40
02/21/2025	MAL	Various meetings and attention to ongoing potential sale issues, need for discovery and strategy for potential actions related to specific NDA party.	2.30
02/21/2025	MAL	Meetings with financial advisors and client to discuss status and plan case strategy.	2.50
02/21/2025	JNK	Conference call with client to discuss labor claim (0.5); prepare response to labor claim (1.6)	2.10
02/21/2025	KJL	Attention to First Report of Information Officer submitted by PWC to Ontario Superior Court of Justice and the Factum of Corsa Coal in connection with the Motion to be presented on February 24, 2025 (.5); analysis of Debtors' monthly operation reports (1.3)	1.80
02/21/2025	MAL	Meeting with BDO tax advisor and interested party regarding NOL analysis.	1.00
02/21/2025	DXS	Meeting with Debtors' professionals and potential plan sponsors regarding plan structure (1.0); meeting with Debtors' Professionals to discuss details of potential chapter 11 plan and related issues (2.6)	3.60
02/21/2025	MAL	Review updated budget and variance reports, discussions with financial advisor regarding same and communications with DIP Lender and KeyBank regarding same.	1.30
02/21/2025	TAR	Meeting with financial advisors and Raines team to discuss issues impacting DIP agreement and various other matters	2.50

02/21/2025	MJR	Meeting with potential buyer	0.50
02/22/2025	MJR	Analysis of DEP issues and 525	0.70
02/22/2025	MAL	Review critical vendor order, critical vendor agreements and draft demand letter/notice to certain critical vendor payment recipients regarding post-petition conduct.	1.80
02/22/2025	MJR	Communications with potential buyers	0.30
02/23/2025	SEW	Review and analyze forfeiture notices received by the PADEP (1.0), review research pertaining to same and complete additional research (.8), and begin drafting motion pertaining to same (4.0)	5.80
02/23/2025	DXS	Attention to preparation of initial draft of motion to compel and research authority relating to the same	1.40
02/23/2025	JNK	Telephone call with D. Schimizzi and M. Lindsay regarding motion to compel enforcement of bidding procedures (0.3); research regarding enforce bidding procedures (1.7)	2.00
02/24/2025	MAL	Various discussions and telephone calls regarding and with equipment contractor regarding status and mobilization.	1.50
02/24/2025	SEW	Complete draft of motion to compel PADEP and confer with internal team regarding same	2.20
02/24/2025	JNK	Addition review of documents and revisions to position statement relating to EEOC claim (1.1); discussion with client representative (0.2); discuss and revise per M. Lindsay comments (0.3); review/revision to Motion relating to DEP Permit Forfeitures (1.4); discussion with S. Wenrich regarding DEP Motion (0.2)	3.20
02/24/2025	MAL	Review and revise motion regarding DEP actions, review various correspondence and claim information and meetings regarding same.	3.20
02/24/2025	MJR	Discuss restructuring strategy with RFL team members (0.4); follow up regarding DEP issues (0.2)	0.60
02/24/2025	MJR	Follow up regarding lease issues and recent inquiry	0.10
02/24/2025	SEW	Review motion to compel LCT and confer with J. Kelly regarding same	0.60
02/24/2025	DXS	Correspondence with W. Buchanan regarding KEIP motion and follow up with Debtors' professionals regarding US Trustee inquiries (.6)	0.60
02/24/2025	MAL	Review and comment EEOC response and supporting documentation and meetings regarding same.	1.70
02/24/2025	MJR	Respond to inquiry from lender (0.1); follow up regarding same (0.2)	0.30

02/24/2025	KJL	Analysis of Commonwealth of Pennsylvania Department of Environmental Protection Objection to sale motion (.9); attention to Reservation of Rights by Cleveland Brothers and CB Mining With Respect to Proposed Sale of the Debtors' Assets and Assumption and Assignment of Executory Contracts (.4); attention to reservation of rights filed by other creditors (.4)	1.70
02/24/2025	JNK	Draft retention application for BDO as tax consultants	2.10
02/24/2025	MJR	Respond to creditor inquiries	0.30
02/24/2025	MJR	Follow up regarding DD inquiries	0.40
02/24/2025	MAL	REview and revise Motion regarding LCT and various meetings regarding same.	3.80
02/24/2025	SEW	Initial review of objections and responses to sale motion	0.60
02/24/2025	DXS	Continue review and analysis of correspondence and confidentiality agreement for inclusion in motion to compel (.8); continue drafting motion to compel (3.2); correspondence with client regarding additional facts for inclusion in the same and review and incorporate the same (.7); correspondence with M. Lindsay and M. Roeschenthaler regarding motion to compel and incorporate additional revisions to the same (.5)	5.20
02/24/2025	MJR	Attention to environmental issues and potential impact on plan	1.20
02/25/2025	MAL	Telephone conference with KeyBank counsel regarding sale process and other outstanding issues.	0.40
02/25/2025	MAL	Draft and revise amended motion regarding DEP claims and actions and various meetings regarding same.	2.50
02/25/2025	JNK	Revise/revise BDO fee Statement and notice of objection and preparation of notice and exhibits for filing.	0.70
02/25/2025	MJR	Review of authority relating to operation issue and confer with BDO regarding status	1.70
02/25/2025	MAL	Review data room update and conference with financial advisors regarding status of sale process and strategy.	1.60
02/25/2025	DXS	Review and analysis of comments from client and Debtors' professionals and further review of and revisions to LCT motion to compel (1.1); conference with Debtors' professionals and client to discuss facts relating to motion (.6); correspondence with M. Lindsay and J. Kelly regarding final revisions to LCT motion to compel (.3); correspondence with chambers regarding filing of expedited motion (.1)	2.10
02/25/2025	JNK	Continue preparation of BDO Tax retention application (0.7); discussion with RFL team regarding changes to retention application (0.3)	1.00

02/25/2025	RWC	review Motion to compel compliance with bidding procedures order with exhibits in order to update discovery request to LCT	0.60
02/25/2025	MAL	Further review and revise motion regarding LCT and various discussions and telephone calls regarding same.	2.30
02/25/2025	KJL	Confer with M. Lindsay and trade publication regarding placement of advertisement for auction of Debtors' assets (.2); attention to email communications and analysis of relevant documentation regarding same (0.6)	0.80
02/25/2025	MAL	Draft and revise letters to certain critical vendors regarding defaults under critical vendors agreements.	1.50
02/25/2025	MJR	Respond to inquiries from consultation parties	0.40
02/25/2025	JNK	Research relating to bond forfeiture notices from DEP	2.20
02/25/2025	JNK	Review/revise Motion to Compel Enforcement with Bidding Procedures and finalize for filing (1.1); multiple discussions with RFL team relating to motion (0.5).	1.60
02/25/2025	DXS	Review of and revisions to notice of default on account of critical vendor agreement and correspondence with M. Lindsay regarding the same (.4)	0.40
02/25/2025	JNK	Correspondence with Client and EEOC representative relating to EEOC claim.	0.30
02/25/2025	DXS	Conference with counsel for KeyBank and Debtors' Professionals regarding DIP financing (.3); correspondence with client and Debtors' Professionals regarding status of operations and related financing matters (.8)	1.10
02/25/2025	JNK	Revise letters to critical vendors regarding beach of critical vendor order.	0.70
02/25/2025	MAL	Attention to adequate assurance requests and finalize utility agreements.	1.10
02/25/2025	MJR	Follow up with buyers and sale related inquiries	0.70
02/26/2025	DXS	Meeting with Debtors' professionals regarding updated forecasts (.8); conference with Debtors' professionals and client regarding operational issues and impact on forecasts (.7); conference with Raines' team regarding DIP Financing matters (.5); conference with Debtors' Professionals and DIP Lender to review financial reports (.8)	2.80
02/26/2025	TAR	Research related to issues impacting permits	3.60
02/26/2025	SEW	Review and revise CNO for RFL's January fee statement and instruct L. Lescalette regarding filing of same	0.20

02/26/2025	DXS	Correspondence with interested parties regarding KEIP Motion and further analysis of proposed KEIP to address comments of interested parties (.9); research and analysis of issues raised by UST in connection with KEIP Motion (.8)	1.70
02/26/2025	MAL	Telephone conference with DIP lender and counsel	0.50
02/26/2025	JNK	Draft Amended Contracts Notice (1.2); communications with client and BDO regarding amended contracts notice (0.2)	1.40
02/26/2025	RWC	review emergency motion regarding bid procedures and finish draft of discovery to LCT	3.30
02/26/2025	MAL	Telephone conference with client regarding operations and forecasting details and review of draft budgets.	1.20
02/26/2025	MAL	Review creditor correspondence regarding pre and post petition claims and consider potential setoff issues.	0.80
02/26/2025	DXS	Correspondence with Debtors' professionals and client regarding status of LCT issues	0.50
02/26/2025	MAL	Various conferences regarding advertising materials and review of updated materials.	0.70
02/26/2025	MAL	In person meetings with Debtors' financial advisors regarding multiple case status and strategy issues.	2.50
02/26/2025	KJL	Attention to Emergency Motion for Entry of Order Compelling Compliance with Bidding Procedures and Confidentiality Agreement	0.40
02/26/2025	MAL	Research regarding DEP issues and review and revise motion regarding DEP actions and claims.	3.50
02/26/2025	JNK	Analysis of workers compensation policy as an executory contract.	1.60
02/26/2025	SEW	Review correspondence from contract counterparty and review and analyze related contracts in our database (.5), and correspondence with M. Lindsay regarding same (.2); confer with J. Kelly regarding revised notice of potential assumed leases (.2)	0.90
02/26/2025	JNK	Analysis and summary of all objections to sale motion and contracts notice (2.4); discuss objections to sale motion with RFL team (0.3)	2.70
02/26/2025	KJL	Distribute APA to potential bidder (.3); Confer with M. Roeschenthaler and client regarding placement of advertisement of auction of Debtors' assets in coal trade publication (.4); attention to email communications regarding same (.4)	1.10
02/27/2025	JNK	Conference call with committee counsel regarding pending matters (0.5); follow-up discussion with RFL team regarding pending matters (0.4)	0.90

02/27/2025	JNK	Prepare memorandum relating to workers compensation policy	0.40
02/27/2025	DXS	Meeting with Debtors' Professionals regarding adjustments to cash forecasts	0.60
02/27/2025	MAL	Various meetings with client group and financial advisors regarding operations status and strategy and preparation for sale issues	3.40
02/27/2025	MJR	Calls and communications with potential bidders	0.70
02/27/2025	MAL	Various emails and discussions regarding equipment creditor issues	0.50
02/27/2025	MAL	Review DEP Objection and Stay Motion and consider responses and additional action	2.50
02/27/2025	SEW	Draft motion for remote testimony related to KEIP motion	0.90
02/27/2025	DXS	Update KEIP analysis and review status of pending matters to prepare for meetings with Committee and KeyBank (1.1); Attend conference with Debtors' and Committee's professionals regarding KEIP Motion, LCT Motion, and DEP issues (.6); Attend conference with Debtors' and KeyBank's professionals regarding KEIP Motion (.3); attention to revisions to motion to authorize virtual appearance (.4)	2.40
02/27/2025	MAL	Review and revise motion regarding DEP actions	1.60
02/27/2025	MJR	Calls with case parties regarding sale and DIP issues	2.10
02/27/2025	MJR	Discussions with BDO and RFL team regarding sale and alternative restructuring options and review of related analyses	1.80
02/27/2025	JNK	Continued review of contracts relating to amending contracts notes (0.8); multiple discussions with RFL team (0.4); multiple communications with creditors (0.3)	1.50
02/27/2025	KJL	Meet with K. Harrigan, M. Roeschenthaler and E. Blum regarding Debtors' water treatment trusts (.6); analysis of DEP summary of outstanding environmental obligations (.8); commence preparation of settlement agreement (3.4)	4.80
02/27/2025	TAR	Research related to issues impacting permits	4.90
02/27/2025	MAL	Telephone conference with committee counsel regarding sale status and other issues	0.50
02/27/2025	MJR	Strategy meeting with RFL regarding exit strategies	0.30
02/28/2025	MAL	Meeting with team and financial advisors regarding sale status, DEP issues and overall status and strategy.	1.50
02/28/2025	MJR	Review sections of CIM	0.20

02/28/2025	MJR	Correspond with potential bidders	0.60
02/28/2025	KJL	Confer with E. Blum regarding response to objection to Debtors' Sale Procedures Motion	0.90
02/28/2025	MJR	Respond to inquiries by client	0.20
02/28/2025	SEW	Review and analyze contract with creditor and confer with M. Lindsay regarding communications pertaining to same and next steps	0.40
02/28/2025	DXS	Correspondence with counsel for KeyBank regarding resolution of issue with KEIP Motion (.1); correspondence with counsel for the Committee regarding resolution of issues with KEIP Motion (.2); correspondence with U.S. Trustee regarding resolution of issues with KEIP Motion (1.0); correspondence with client regarding additional information requests from the U.S. Trustee (.4); correspondence with client regarding modifications to proposed KEIP to resolve potential objections (.3); attention to revisions to proposed order approving KEIP (.3); correspondence with counsel for KeyBank and Committee regarding motion to authorize virtual appearance and finalize and file motion to authorize virtual appearance (.6)	2.90
02/28/2025	MAL	Review and comment on Confidential Information Memorandum and meeting with E. Blum regarding same.	1.00
02/28/2025	MAL	Communications with company regarding various DEP items and issues.	0.60
02/28/2025	DXS	Correspondence with Committee counsel regarding data room request (.2); review data room for information request and correspondence with Debtors' and Committee's professionals regarding the same (.5); meeting with Debtors' professionals regarding DEP issues and impact on sale prospects and review and analysis of DEP issues (1.9)	2.60
02/28/2025	JNK	Multiple communications with creditors regarding formal and informal objections relating to contracts notice (0.6); communications with client regarding amended contract list (0.3); finalize amended contract notice and list for filing (0.6)	1.50
02/28/2025	MJR	Prepare for and participate in board call and follow up call with D. Schimizzi regarding same	1.20
02/28/2025	KJL	Exchange email communications and conference call with BDO and potential bidder(.5); attention to additional data room requests from potential bidder (.4)	0.90
02/28/2025	TAR	Research related to issues impacting permits; discussion with M. Roeschenthaler providing update on findings	2.70
02/28/2025	JNK	Analysis of DEP motion for relief from automatic stay (2.4); discussions with RFL team regarding DEP motion (0.4)	2.80

02/28/2025	MJR	Strategy discussion with RFL team and BDO regarding exit strategy and claims	0.50
02/28/2025	MAL	Review amended contract notice and list for filing and various conferences with J. Kelly regarding resolving objections.	1.20
02/28/2025	KJL	Confer with BDO regarding status of Debtors' water treatment trusts (.8); Meet with Raines and BDO teams regarding objections to sales procedures motion and response to same (1.4); Prepare draft of settlement agreement as to same (.9)	3.10
02/28/2025	MAL	Review contract for service provider and various communications regarding request for critical vendor status.	0.80
02/28/2025	MAL	Review updated DIP budget and related reports and emails regarding same.	0.60
02/28/2025	MAL	Review DEP stay related motion, research regarding same and conferences with J. Kelly regarding same.	1.80
02/28/2025	DXS	Prepare for and attend meeting of the Board of the Debtors to discuss directives for next steps (1.2)	1.20
02/28/2025	JNK	Review/revise motion for remote hearing prep	0.30
02/28/2025	MAL	Review DEP objection to sale and begin outline to address objection allegations	1.30
Sub-total Fees:			\$328,217.00

Rate Summary

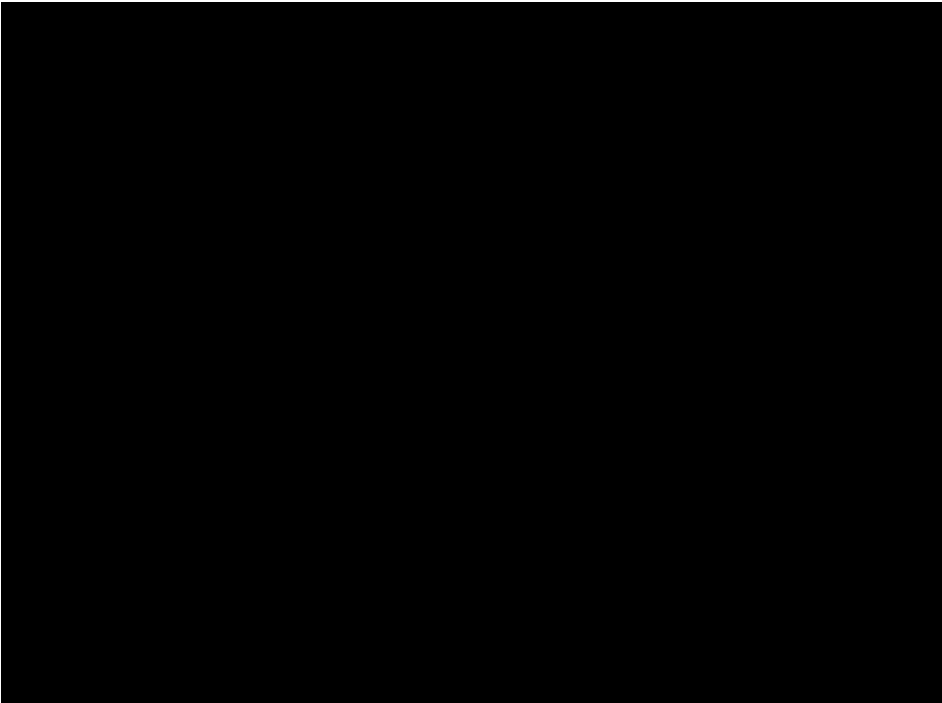
Jordan N. Kelly	46.80 hours at \$485.00/hr	\$22,698.00
Kenneth J. Lund	26.10 hours at \$875.00/hr	\$22,837.50
Michael J. Roeschenthaler	47.00 hours at \$860.00/hr	\$40,420.00
Lela Lescalette	0.50 hours at \$375.00/hr	\$187.50
Daniel R. Schimizzi	71.30 hours at \$615.00/hr	\$43,849.50
Harry A. Readshaw	1.70 hours at \$665.00/hr	\$1,130.50
Mark A. Lindsay	188.70 hours at \$780.00/hr	\$147,186.00
Tina A. Roeschenthaler	13.90 hours at \$670.00/hr	\$9,313.00
Jesse D. Nelms	5.00 hours at \$425.00/hr	\$2,125.00
Sarah Wenrich	56.00 hours at \$575.00/hr	\$32,200.00
Ronald W. Crouch	7.60 hours at \$825.00/hr	\$6,270.00
Total hours:	464.60	\$328,217.00

Payments

03/13/2025	Payment	Trust Application	430,993.47
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Sub-total Payments: \$430,993.4
7

Total Current Billing: \$328,217.00
Previous Balance Due: \$538,727.87
Total Payments: (\$430,993.47)
Total Now Due: \$435,951.40



**Monthly Fee Statement of Raines Feldman Littrell, LLP
for the Period of March 1, 2025 through March 31, 2025**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related to Document No.: 164
v.	Hearing Date:
NO RESPONDENT.	Hearing Time:
	Response Deadline:

**SUMMARY OF MONTHLY FEE STATEMENT OF RAINES FELDMAN LITTRELL
LLP FOR THE PERIOD FROM MARCH 1, 2025 THROUGH MARCH 31, 2025**

Name of applicant:	Raines Feldman Littrell, LLP
Authorized to provide professional services to:	The Debtors
Petition Date:	January 6, 2025
Date of Retention:	January 28, 2025, effective as of January 6, 2025, see Doc. No. 192
This is a	Fee Statement
Period for which compensation and reimbursement are sought:	March 1, 2025, through March 31, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$406,696.40 (representing 80% of the total fees of \$508,370.50)

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors' address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

Amount of expense reimbursement sought as actual, reasonable, and necessary: \$16,003.50

Blended hourly rate for this fee statement: \$725.10

SUMMARY OF PRIOR MONTHLY FEE APPLICATIONS

DATE FILED	PERIOD COVERED	REQUESTED		UNOPPOSED		PAID		HOLDBACK FEES
		FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES	
2/12/2025	1/6/2025 – 1/31/2025	\$430,937.60	\$20,055.87	\$430,937.60	\$20,055.87	\$430,937.60	\$20,055.87	\$107,734.00
3/14/2025	2/1/2025 – 2/28/2025	\$262,573.60	\$0	\$262,573.60	\$0	\$262,573.60	\$0	\$65,643.40
	Totals:	\$693,511.20	\$20,055.87	\$693,511.20	\$20,055.87	\$693,511.20	\$20,055.87	\$173,377.40

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

DATE FILED	PERIOD COVERED	ORDER ENTERED	REQUESTED		ALLOWED		PAID	
			FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES
N/A								
		Totals:					\$	

COMPENSATION BY PROFESSIONAL

The attorneys who rendered professional services in these Chapter 11 Cases from March 1, 2025 through March 31, 2025 (the “Fee Period”) are:

NAME OF PROFESSIONAL	POSITION	DEPT.	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Michael J. Roeschenthaler	Partner	Bankruptcy	2001	\$860.00	165.3	\$142,158.00
Kenneth J. Lund	Partner	Bankruptcy	1991	\$875.00	26.5	\$23,187.50
Eric Blum	Partner	Corporate	1998	\$845.00	42.7	\$36,081.50
Mark Melickian	Partner	Bankruptcy	1995	\$865.00	2.1	\$1,816.50
Matthew Schiff	Partner	Labor & Employment	1982	\$720.00	1.6	\$1,152.00
Daniel R. Schimizzi	Partner	Bankruptcy	2011	\$615.00	79.2	\$48,708.00
Scott Hare	Partner	Litigation	1991	\$920.00	1.1	\$1,012.00
Ronald W. Crouch	Counsel	Bankruptcy	1981	\$825.00	14.90	\$12,292.50
Mark A. Lindsay	Counsel	Bankruptcy	2002	\$780.00	189.9	\$148,122.00
Harry A. Readshaw	Counsel	Bankruptcy	2006	\$665.00	15.50	\$10,307.50
Tina A. Roeschenthaler	Counsel	Bankruptcy	2001	\$670.00	38.2	\$25,594.00
Sarah E. Wenrich	Associate	Bankruptcy	2018	\$575.00	10.6	\$6,095.00

Jordan N. Kelly	Associate	Bankruptcy	2020	\$485.00	102.9	\$49,421.50
Jesse D. Nelms	Associate	Litigation	2024	\$425.00	2.7	\$1,147.50
Total for Attorneys:					693.2	\$507,095.50

The paraprofessionals and other staff who rendered professional services in these Chapter 11 Cases during the Fee Period are:

NAME OF PARAPROFESSIONAL OR STAFF MEMBER	POSITION	DEPT.	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Lela M. Lescallette	Paralegal	Bankruptcy	\$375.00	7.9	\$1,275.00
Total for Paraprofessionals and Other Staff:				7.9	\$1,275.00

COMPENSATION BY PROFESSIONAL CATEGORY

PROFESSIONALS	BLENDED RATE	TOTAL HOURS	TOTAL COMPENSATION
Partners	\$797.85	318.5	\$254,115.50
Counsel	\$759.44	258.5	\$196,316.00
Associates	\$487.64	116.2	\$56,664.00
Paralegals	\$161.39	7.9	\$1,275.00
Blended Hourly Rate/Total Fees	\$725.10	701.1	\$508,370.50
Less 20% Holdback			\$101,674.10
Total Fees Requested			\$406,696.40

COMPENSATION BY PROJECT CATEGORY

NO.	PROJECT CATEGORY	TOTAL HOURS BILLED	TOTAL COMPENSATION
B110	Case Administration	45.8	\$29,745.50
B130	Asset Disposition	422.7	\$307,416.50
B150	Meetings and Communications with Creditors	8.2	\$4,896.00
B160	Fee Applications and Objections to Fee Applications	6.2	\$2,974.00
B170	Employment Applications and Objections	8.5	\$4,919.00
B185	Assumption / Rejection of Leases	12.5	\$7,549.50
B190	Other Contested Matters and Omnibus Hearings	51.9	\$32,532.00
B205	State Court Matters	10.3	\$3,510.00
B210	Business Operations	56	\$38,893.50
B220	Employee Benefits	20	\$9,726.50
B230	Financing / Cash Collateral	8.2	\$6,438.50
B260	Board of Directors Matters	1.2	\$1,032.00
B310	Claims Administration and Objections	48.3	\$35,368.50
B320	Plan and Disclosure Statement	1.3	\$1,118.00
	TOTAL:	701.1	\$508,370.50
	Total Fees Requested		\$508,370.50

ITEMIZED EXPENSES

EXPENSE CATEGORY	TOTAL EXPENSES
E108 – Postage	\$2.50
E123 – Lien Search	\$16,001.00
TOTAL:	\$16,003.50

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related to Document No.: 164
v.	Hearing Date:
NO RESPONDENT.	Hearing Time:
	Response Deadline:

**MONTHLY FEE STATEMENT OF RAINES FELDMAN LITTRELL LLP FOR THE
PERIOD FROM MARCH 1, 2025 THROUGH MARCH 31, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, rule 2016 of the Federal Rules of Bankruptcy Procedure, rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Western District of Pennsylvania, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [Doc. No. 164] (the “Interim Compensation Order”), Raines Feldman Littrell, LLP (“Raines”), counsel for Debtors, hereby files this monthly fee statement relating to compensation for professional services rendered to the Debtors and for reimbursement of actual and necessary expenses incurred in connection therewith for the period commencing

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

March 1, 2025 through March 31, 2025 (the “Fee Period”), and requests authorization, in accordance with the Interim Compensation Order, to be paid by the Debtors in the aggregate amount of \$406,696.40, representing 80% of the total amount of fees of \$508,370.50 and 100% of the expenses of \$16,003.50 incurred during the Fee Period. Copies of Raines’ itemized time records for professionals and paraprofessionals performing services for the Debtors during the Fee Period are attached hereto as **Exhibit A**.

Respectfully submitted,

Dated: April 14, 2025

RAINES FELDMAN LITRELL, LLP

By: /s/ Michael J. Roeschenthaler

Michael J. Roeschenthaler (PA ID No. 87647)

Kenneth J. Lund (PA ID No. 63468)

Mark A. Lindsay (PA ID No. 89487)

Daniel R. Schimizzi (PA ID No. 311869)

11 Stanwix Street, Suite 1100

Pittsburgh, PA 15222

Telephone: 412-899-6462

Email: mroeschenthaler@raineslaw.com

klund@raineslaw.com

mlindsay@raineslaw.com

dschimizzi@raineslaw.com

Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Itemized Time Records by Project Category

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: 4/9/2025
Invoice Number: 132406

Corsa Coal, Corp. et al
Kevin M. Harrigan, President and CEO
1576 Storystown Road
PO Box 260
Friedens, PA 15541

8227-002 / Corsa Bankruptcy

Professional Services		Hours
02/25/2025 MJR	Participate in strategy meetings regarding sale and restructuring strategy	2.10
03/02/2025 MAL	Review and revise BDO USA retention application and emails regarding same.	0.80
03/03/2025 DXS	Correspondence with US Trustee, PA DEP, KeyBank, and Committee regarding requested modifications to KEIP and correspondence with client regarding the same (0.7)	0.70
03/03/2025 SEW	Research pertaining to perfection of alleged lien (1.3) and correspondence with M. Lindsay regarding same (.3)	1.60
03/03/2025 MAL	Review NOL spreadsheet, prior correspondence regarding same and telephone call with BDO regarding analysis.	0.80
03/03/2025 DXS	Conference with Debtors' professionals and client to discuss DEP Issues (0.6); review and analysis of CIM and related disclosures in connection with DEP Issues (.8); meetings with K. Lund, M. Lindsay, and J. Kelly to discuss DEP issues (.4)	1.80
03/03/2025 MJR	Review 525 motion and analysis of DEP actions and demands	1.20
03/03/2025 KJL	Conference call with BDO regarding the status of Debtors' bonding program and environmental liabilities (1.0); Analysis of Confidential Information Memorandum and email communications in advance of call with BDO (.9); Attention to correspondence from the PA DEP and email communications regarding same (.9); continued preparation of settlement agreement with PA DEP and legal research for same (4.6)	7.40

03/03/2025 KJL	Prepare Non-Disclosure Agreement for potential bidder and email communications regarding same	0.30
03/03/2025 MAL	Review notices from DEP, various telephone calls and meetings regarding resolution of same.	2.10
03/03/2025 MJR	Analysis of plan options and monetizing NOLS with calls with potential plan funders, BDO and RFL	1.30
03/03/2025 MAL	Conference with S. Wenrich regarding UCC research issues.	0.40
03/03/2025 MAL	Research, review and analyze legal authority and caselaw related to DEP stay motion and discussions with J. Kelly regarding same.	1.80
03/03/2025 JNK	Review/analysis of LCT's response to motion to compel and declarations in support.	0.80
03/03/2025 MAL	Research and review regarding alleged equipment vendor claim and review lien searches.	0.80
03/03/2025 MAL	Review and revise draft response to DEP stay related motion, review subject permits and bonding notices, and various meetings and emails regarding same.	1.70
03/03/2025 JNK	Draft objection to DEP's motion for relief from stay (2.1); discuss DEP objection with M. Lindsay (0.3)	2.40
03/03/2025 MJR	Review of forfeiture notices and communications with client, BDO, surety and RFL team and follow up regarding same and analysis of related issues	2.60
03/03/2025 JNK	Communications with client and BDO relating to BDO tax retention application (0.2); finalize BDO retention application for filing (0.3); review/revise notice of hearing relating to BDO retention app. (0.2)	0.70
03/03/2025 MJR	Follow up on bidder inquiries	0.70
03/03/2025 JNK	Communication with Rockwood regarding objection to contracts notice.	0.20
03/04/2025 MAL	Conferences with D. Schimizzi and E. Blum regarding sale process, various ongoing and pending issues and contested matters.	2.10
03/04/2025 SEW	Prepare and file all proofs of publications, including addressing notice of nonconforming document, and trade emails with Omni regarding same	0.40
03/04/2025 JNK	Prepare checklist for qualifying bids.	0.70
03/04/2025 MJR	Attention to sale inquiries and related strategic options and correspondence with BDO, client and RFL	5.30

03/04/2025 JNK	Prepare for contested hearing on motion to compel (1.5); review OCC's response to motion to compel (0.2)	1.70
03/04/2025 MJR	Correspondence and communications with the debtors and BDO regarding sale options and related follow up	1.40
03/04/2025 JNK	Discussion with D. Schimizzi relating to hearing preparation (0.3)	0.30
03/04/2025 MAL	Conference with S. Wenrich and review of research regarding factoring security interest rights.	0.80
03/04/2025 DXS	Continue revising draft settlement agreement with PA DEP and correspondence with K. Lund and M. Lindsay regarding the same (1.1); meeting with Debtors' Professionals and K. Harrigan to discuss LCT issues (.8); continue review and analysis of LCT Response to emergency motion to compel (.4); Draft revised order on KEIP Motion and correspondence with interested parties regarding approval of the same (.4); draft revised order on Motion to Seal and correspondence with U.S. Trustee regarding approval of the same (.3); prepare certifications of counsel and clean and redline revised orders for KEIP Motion and Motion to Seal (.8); correspondence with interested parties regarding approval of the same and finalize, file via CM/ECF, and instruct Omni on service (.4)	4.20
03/04/2025 MJR	Correspondence with liquidators	0.20
03/04/2025 MAL	Telephone conference with counsel for equipment vendor and further review of contract and lien documentation.	0.80
03/04/2025 SEW	Correspondence with M. Lindsay regarding creditor communications pertaining to payment and research regarding article 9 of the UCC affecting same	2.40
03/04/2025 KJL	Confer with D. Schimizzi regarding revisions to proposed settlement agreement and strategy as to same (.6); meet with M. Lindsay and D. Schimizzi regarding US Steel coal supply agreements and conduct legal review of same (.5)	1.10
03/04/2025 DXS	Meeting with Debtors' professionals and client regarding revenue forecast and related issues	0.70
03/04/2025 MAL	Review LCT response and various conferences and telephone calls regarding hearing preparation.	1.00
03/04/2025 KJL	Prepare Non-Disclosure Agreement for potential bidder and email communications regarding same (.3); prepare revisions to Non-Disclosure Agreement and attention to execution of same (.2); confer with BDO regarding status of same (.2)	0.90
03/04/2025 MJR	Calls with BDO regarding sale and exit options and related follow up	0.70

03/04/2025	MJR	Call with surety counsel and follow up regarding declarations of forfeiture	0.90
03/04/2025	MAL	Review and revise draft stipulation to address DEP issues and claims and conferences with D. Schimizzi regarding same.	1.80
03/04/2025	MAL	Various discussions with D. Schimizzi and E. Blum regarding KEIP motion.	0.40
03/05/2025	MJR	Prepare for and attend hearing on motion to compel compliance with bidding procedures	1.40
03/05/2025	MJR	Calls with liquidators regarding potential liquidation sale	0.40
03/05/2025	KJL	Finalize Non-Disclosure Agreement with potential bidder and meet with BDO regarding same	0.20
03/05/2025	DXS	Multiple conferences with Debtors' professionals and interested parties regarding sale terms and potential bids (1.3); Attention to review and analysis of issues raised by DEP and correspondence with M. Lindsay and J. Kelly regarding response to the same (.8); Meeting with Debtors' professionals and client to discuss bid deadlines, preparation of additional documents in connection with auction, auction procedures, and form sale order (1.6)	3.70
03/05/2025	SEW	Review agreement with contractor and provide proposed email to same regarding violation of automatic stay and critical vendor requirements, then send email to M. Lindsay regarding same	0.60
03/05/2025	MJR	Discussions with BDO and client regarding operations, forecasting and sales and related follow up	1.40
03/05/2025	JNK	Further revisions to objection to DEP objection per discussion with M. Lindsay	1.50
03/05/2025	MJR	Calls to interested parties regarding sale and follow up regarding same	1.10
03/05/2025	DXS	Prepare for and attend hearings on LCT Motion to Compel, KEIP Motion, and Motion to Seal (2.3)	2.30
03/05/2025	MJR	Correspondence and calls with counsel with new bidder	0.70
03/05/2025	MAL	Various discussions regarding factoring company demand regarding vendor	0.60
03/05/2025	SEW	Assist in preparation for sale and PA DEP hearing and correspond with internal team regarding same	2.30
03/05/2025	JNK	Analysis relating waiver shareholder disclosure requirement for publicly traded companies (0.4); discuss waiver motion with M. Lindsay and D. Schimizzi (0.2)	0.60

03/05/2025	MAL	Review and revise draft agreement regarding DEP issues	0.80
03/05/2025	JNK	Review declarations regarding equity shareholders (0.3); communications with client relating to declarations (0.2)	0.50
03/05/2025	MAL	Communications regarding resolution of creditor issues and outstanding payments	0.60
03/05/2025	JNK	Attend hearing on motion to compel and KEIP	0.20
03/05/2025	MAL	Attention to potential bidder inquiries, review of documents and various discussions regarding bidding and sale procedures	3.90
03/05/2025	MAL	Review of DEP inquiries and communications regarding same	0.70
03/05/2025	JNK	Review/analysis of four contracts with Cleveland Brothers (0.5); communications with counsel for Cleveland Brothers and client relating to contracts (0.2)	0.70
03/06/2025	JNK	Prepare second amended contracts notice	0.40
03/06/2025	SEW	Continued preparation for upcoming sale hearing, finalize various pleadings, and confer with internal team regarding same	0.90
03/06/2025	MJR	Calls, correspondence and follow up in response to potential bidder and related follow up concerning due diligence, deal structure and related issues	2.40
03/06/2025	MAL	Review and revise draft sale Order	1.30
03/06/2025	MAL	Review and analyze potential asset pools and communications with bidders regarding bids	2.00
03/06/2025	MAL	Review DEP Objection, consider resolution issues and telephone conference with DEP regarding sale status, objection and various issues	1.80
03/06/2025	MJR	Follow up with client and potential bidders regarding auction	0.70
03/06/2025	MJR	Prepare for and participate in call with DEP and attention to DEP issues, potential global settlement and discussions with debtors' professionals regarding same	2.20
03/06/2025	JNK	Telephone call with counsel for creditor SII (0.2); communications with client regarding SII cures (0.2); discuss second amended contract notice with M. Lindsay (0.2)	0.60
03/06/2025	SEW	Additional review of various responses and objections to sale motion, then draft omnibus reply to same	2.00
03/06/2025	JNK	RFL team meeting regarding outstanding items relating to sale.	0.30

03/06/2025	JNK	Correspondence with client regarding Cleveland Brother contracts.	0.20
03/06/2025	DXS	Attention to preparation of auction agreement for auction participants (.8); correspondence with Raines' team regarding status of sale and preparation for auction and sale hearing (.5); review agenda and binder index and revisions to the same (.3); Review and analysis of draft proposed sale order for circulation to qualified bidders (0.8)	2.40
03/06/2025	JNK	Preparation of sale order	3.40
03/06/2025	KJL	Confer with M. Lindsay regarding water treatment trusts (.3); analysis of BDO spreadsheet and prepare email communications regarding same (.3)	0.60
03/06/2025	JNK	Review/revise omnibus response to sale motion objections and reservations	0.40
03/06/2025	SEW	Confer with internal team regarding current status of case, upcoming deadlines, and outstanding tasks	0.40
03/06/2025	DXS	Correspondence with U.S. Trustee and Debtors' professionals regarding adjournment of 341 meeting and provide continued dates for the same	0.40
03/07/2025	JNK	Revise contracts list for second amended contracts notice.	0.40
03/07/2025	JNK	Prepare 9019 motion relating to settlement with DEP	1.90
03/07/2025	MJR	Call with bidder regarding sale related issues	0.30
03/07/2025	JNK	Review revised declarations relating to equity interests	0.30
03/07/2025	DXS	Correspondence with U.S. Trustee regarding 341 adjournment and appear for 341 to confirm adjournment	0.40
03/07/2025	MAL	Review Permits, Bonds, and Water Trust details and alleged liability issues.	1.60
03/07/2025	MJR	Review of bids and correspondence with bidders and discussions with BDO, the debtor, the DEP, and other interested case parties (3.1); analysis of bids and discussion with BDO, RFL and client (2.3)	5.40
03/07/2025	MAL	Review and revise proposed Sale Order and various discussions regarding same.	1.80
03/07/2025	MAL	Initial review of bids received from potential purchasers.	1.10
03/07/2025	MJR	Call with client and BDO regarding sale issues and related matters and follow up regarding same	0.60

03/07/2025	MAL	Review and revise objection to DEP stay related motion and various discussions regarding same.	1.70
03/07/2025	MAL	Additional revisions to contract notice list and communications regarding same.	1.00
03/07/2025	MAL	Various communications with potential bidders and telephone calls client and BDO regarding sale status and strategy.	1.40
03/07/2025	KJL	Meet with M. Roeschenthaler regarding status of auction process	0.20
03/07/2025	JNK	Do not bill	0.30
03/07/2025	JNK	Continued preparation of proposed sale order.	2.40
03/07/2025	DXS	Draft acknowledge and agreement to be bound by auction procedures and circulate to Debtors' professionals for comment and review (1.1); conference with Debtors' professionals to review asset analysis for evaluation of bids (.5); conference with Raines' team regarding auction preparation and procedures (.6); review of proposed form of sale order and correspondence with J. Kelly and M. Lindsay regarding the same (.4); review and analysis of bids received and related modifications to proposed APA (1.7); Correspondence with Committee professionals and Debtors' professionals regarding bids received and related issues (.3)	4.60
03/08/2025	JNK	Research relating to requirements under PA state law relating to transferring assets	1.70
03/08/2025	MAL	Review and analyze bids and asset mix, review and revise amended APAs and various calls and communications regarding same.	7.50
03/08/2025	DXS	Conferences with Debtors' professionals regarding bid review and analysis of terms (1.0); correspondence with consultation parties regarding bids received (.2); attention to review and analysis of, and identify issues in, bids received from potential bidders (2.4); correspondence with M. Lindsay and J. Kelly regarding environmental liability issues (.5)	4.10
03/08/2025	MJR	Review of bids and calls with potential bidders and counsel, BDO, RFL team members and client to assess options relating to lots, related research and analysis associated with permit options and sale options	11.30
03/09/2025	JNK	Research relating to WARN act requirements.	2.20
03/09/2025	MJR	Analysis of bids and revisions to documents; calls with bidders, client, FA, DEP, surety counsel regarding sale terms and auction prep	11.60

03/09/2025 DXS	Conference with Debtors' professionals regarding status of bids received and issues arising under the same (.9); conference with counsel for LCT regarding bid (.3); review and analysis of proposed revisions to bids received and correspondence with M. Lindsay regarding the same (.5)	1.70
03/09/2025 MJR	Review of materials and auction prep	2.40
03/09/2025 MAL	Various discussions, research and consideration of WARN act notices based on terms of bids received.	0.90
03/09/2025 DXS	Multiple conferences with M. Roeschenthaler, M. Lindsay, and J. Kelly regarding employee notice issue (1.3); research and analysis of statutory and related authority on employee notice requirements and exceptions to the same (2.1); attention to drafting of employee notice and correspondence with M. Roeschenthaler, M. Lindsay, and J. Kelly regarding the same (2.4)	5.80
03/09/2025 MAL	Additional revisions to amended APAs, various telephone conferences and emails with multiple interested parties regarding same and auction process and draft and transmit notice to non-bidder parties	7.10
03/10/2025 JNK	Prepare final agenda	0.30
03/10/2025 MSM	Review precedent materials on WARN (0.5); prepare proposed revisions with commentary to draft WARN notice (1.1)	1.60
03/10/2025 MJR	Prepare for and participate in auction and related follow up with client and bidders	9.80
03/10/2025 JNK	Multiple communications with Rockwood regarding objection to contracts notice	0.30
03/10/2025 MAL	Prepare for and attend auction for sale of debtors' assets, negotiations and review of asset listings and offers and various meetings, discussions and telephone calls regarding same.	9.50
03/10/2025 KJL	Commence legal research regarding environmental issues	1.20
03/10/2025 JNK	Research relating to notification requirements relating to employee notice and identifying parties to be noticed	1.50
03/10/2025 KJL	Analysis of Debtors' Objection to Commonwealth's Motion for Order that Automatic Stay Does Not Exclude Debtors' Compliance with State Environmental Laws in advance of hearing on same	0.40
03/10/2025 KJL	Meet with Raines team members re auction	0.60

03/10/2025 DXS	Correspondence with Debtors' Professionals regarding employee notice requirements and authority related to the same (.6); continue review of and revisions to employee notice form for client review (.8); continue review and analysis of statutory authority and related case law regarding employee notice (1.8)	3.20
03/10/2025 DXS	Correspondence with M. Roeschenthaler, J. Kelly, M. Lindsay, and consultation parties regarding auction (1.8); attend auction virtually (1.0); attention to continued review and analysis of revised modified APAs in connection with revised bids (1.3)	3.10
03/10/2025 JNK	Preparation for auction with RFL and BDO professionals (1.0); attend auction, multiple conversations with RFL team (3.0)	4.00
03/10/2025 MSM	Call with Mike Roeschenthaler, Dan Schmizzi regarding WARN notices	0.20
03/11/2025 JNK	Draft correspondence to local, state and federal officials relating to employee notice.	1.40
03/11/2025 KJL	Meet with Raines team regarding auction status and action plan going forward (.4)	0.40
03/11/2025 MAL	Various emails and discussions with creditor's counsel regarding factoring company demands.	0.70
03/11/2025 JNK	Prepare stipulation and adjournment of sale hearing (0.4) (discounted); multiple conversations discussions with RFL team relating to sale hearing adjournment (0.3)	0.70
03/11/2025 MAL	Various discussions regarding necessary WARN act noticing and review and revise notices.	0.80
03/11/2025 MAL	Begin review and revision of draft sale order, communications with committee counsel regarding status and review of sale objections.	1.30
03/11/2025 MAL	Telephone conference with DEP regarding sale status, water treatment, etc. and review various DEP claims/issues.	1.70
03/11/2025 MAL	Review Amended DEP COA and discussions regarding water treatment equipment	0.60
03/11/2025 JDN	Research relating to wind down issues and employee-related issues	2.70
03/11/2025 DXS	Conference with J. Roach regarding status of sale and sale hearing (.5); correspondence with chambers, Committee counsel, KeyBank counsel, and United States Trustee regarding adjournment of sale hearing (.3); draft and circulate stipulation and consent order adjourning sale order hearing for review and approval (.9); conferences with Debtors' professionals regarding strategy and next steps in addressing sale issues (.9)	2.60

03/11/2025 MJR	Attention to employee related issues and potential sale transactions, including communications with potential going concern bidders	0.80
03/11/2025 JNK	Revise draft sale order based on auction.	0.40
03/11/2025 MAL	Meeting with BDO regarding budget, sale issues and operations and review budget data.	1.00
03/11/2025 MSM	Review and further comment to D. Schmizzi on revised WARN notice	0.30
03/11/2025 JNK	Prepare certificate of no objection relating to BDO fee statement.	0.30
03/11/2025 SMH	Meeting with M. Roeschenthaler, D. Schimizzi regarding WARN Act issues (.4); review/edit WARN Act notice letter (.7)	1.10
03/11/2025 DXS	Continue researching authority relating to employee notice requirements (0.6); review of notices provided by M. Melickian and conference with M. Melickian and M. Roeschenthaler regarding employee notices (.6); continue drafting and revising employee notice and correspondence with client and Raines' team regarding the same (0.7); further revisions to proposed employee notice following conferences with client representatives (.3); review and revise notice to state agencies and correspondence with J. Kelly regarding the same (.2); review and identify required notice parties for employee notices (.4)	2.80
03/11/2025 MJR	Calls and correspondence with DIP lender and case parties regarding budget and post-sale issues, including winddown and related issues	0.60
03/11/2025 MJR	Calls relating to sale, DEP issues and employment issues with BDO, Debtor, DEP, bidders and case parties and related follow up and analysis	3.60
03/11/2025 MAL	Discussions regarding and review of vendor's purported contract termination notice and demand.	0.60
03/12/2025 MAL	Meeting with BDO to review and discuss various operations issues, budgeting and forecast and review drafts of same	0.80
03/12/2025 MAL	Review sale information and attend initial sale hearing	1.20
03/12/2025 JNK	Preparation for and attend sale hearing.	1.10
03/12/2025 JNK	Review revised sale order (0.8); RFL discussion regarding sale order (0.2).	1.00
03/12/2025 MAL	Review documents and attention to creditor dispute.	0.60
03/12/2025 MJR	Attention to employee related matters and discuss the same with client, BDO and RFL	0.70

03/12/2025 MJR	Correspond with BDO, RFL and client regarding pending bids and advance transactions	3.10
03/12/2025 MAL	Review water treatment agreements and sale equipment lists and communications with DEP regarding same	1.10
03/12/2025 DXS	Attend virtual status conference on sale motion and related matters and follow up meetings with Debtors' professionals regarding strategy and next steps (0.8)	0.80
03/12/2025 MAL	Draft and revise sale order and communications with parties in interest regarding same	1.70
03/12/2025 JNK	Discussions with D. Schimizzi related to revising letter to officials regarding employee notices	0.30
03/12/2025 MJR	Correspondence and communications with liquidators and follow up with client, BDO and RFL	0.40
03/12/2025 DXS	Correspondence with client regarding employee notices and further revisions to the same for dissemination to employees (.4); correspondence with J. Kelly regarding additional information needed for notice to state agencies (.3)	0.70
03/12/2025 EBB	Conference with Raines team regarding Asset Purchase Agreement (.3); review Rosebud Asset Purchase Agreement and schedules thereto (3.8).	4.10
03/12/2025 MAL	Various meetings and attention to issues regarding potential equipment liquidators	0.80
03/13/2025 JNK	Review and analysis of invoices and related statement and prepare second monthly fee statement.	0.90
03/13/2025 MJR	Review and analysis of materials and issues relating to winddown and call with E. Blum regarding same	2.10
03/13/2025 MAL	Review additional requests from DEP and related Consent Orders and water treatment equipment issues.	1.40
03/13/2025 MJR	Calls and communications relating to sale, potential new bidders and related follow up with RFL, BDO and the Debtors, including analysis of potential deal structures	2.50
03/13/2025 MJR	Call with counsel for KeyBank regarding status	0.10
03/13/2025 JNK	Communications with Stikeman regarding sale and case update.	0.30
03/13/2025 KJL	Prepare non-disclosure agreement and email communication regarding same	0.20

03/13/2025	MAL	Review budget information and telephone call with BDO regarding DIP budget and forecasting.	1.20
03/13/2025	TAR	Research and analysis on issues relating to wind down	3.10
03/13/2025	MJR	Calls and communications with BDO regarding DIP issues and related follow up and analysis	0.40
03/13/2025	EBB	Multiple correspondence regarding APA (.5); further review of same (4.2)	4.70
03/13/2025	JNK	Finalize exhibits to employee notice.	0.50
03/13/2025	MAL	Telephone conference with client group and review of documents in preparation for 341 meeting	1.70
03/13/2025	MAL	Various discussions and correspondence regarding sale asset lists and permits	0.80
03/13/2025	MJR	Call with Hilco and follow up with other liquidators regarding sale and options (0.4); follow up with BDO and client regarding same (0.4)	0.80
03/14/2025	DXS	Correspondence with Committee counsel regarding insurance policies	0.20
03/14/2025	MJR	Call with committee professionals	0.30
03/14/2025	MJR	Call with D. Waxman and review materials in connection with potential global settlement	0.70
03/14/2025	JNK	Coordinate with RFL team regarding deadlines for fee statements and status of same (0.3); review/revise RFL February fee statement (0.4); Revise BDO February fee statement and finalize for filing (0.4).	1.10
03/14/2025	MJR	Follow up regarding sale including calls with client, buyers, committee, surety counsel and related correspondence	2.10
03/14/2025	MAL	Review schedules and SOFAs in preparation for 341 meeting and attend same.	2.50
03/14/2025	MAL	Various discussions and attention to creditor/vendor issues and demands	1.40
03/15/2025	MAL	Draft stay violation letter to creditor, review and analyze related contracts and emails with client re same	1.50
03/15/2025	MJR	Calls and correspondence with potential buyers and BDO and related follow up	1.60
03/16/2025	MAL	Various communications and attention to potential sale issues	1.10

03/16/2025 JNK	Multiple communications regarding insurance policies with committee and client.	0.20
03/17/2025 MJR	Calls with case parties regarding sale related issues, including bidders, KeyBank, the DIP Lender and other case parties	1.40
03/17/2025 MJR	Correspond with bidders regarding site visit and issues relating to sale	1.10
03/17/2025 MJR	Follow up regarding DEP issues, including review of related authority and discussions with RFL team regarding same	0.80
03/17/2025 MJR	Review correspondence from DEP and follow up with client regarding same (0.2); review draft of settlement agreement (0.4)	0.60
03/17/2025 MAL	Review comments and questions regarding sale issues and revise transaction documents	3.00
03/17/2025 MJR	Calls and communications with BDO regarding sale and case winddown issues and related follow up	1.10
03/17/2025 JNK	Communication with client regarding Maryland employees (0.2); communications with Maryland DOL regarding employee notice (0.2)	0.40
03/17/2025 EBB	Review and revise revised APA from Kia II LLC.	5.70
03/17/2025 MJR	Call with counsel for Rosebud	0.20
03/17/2025 MAL	Analysis and various communications with and regarding factor company demand	0.70
03/17/2025 MJR	Call with DIP lender regarding sales and extension fee and follow up regarding same	0.30
03/17/2025 MAL	Review and analyze mechanic's lien filings and initial research regarding same	1.70
03/17/2025 MAL	Various telephone calls, communications and analysis regarding issues with sale schedules, assets and APAs.	1.80
03/18/2025 MJR	Follow up on inquiry by surety (0.1)	0.10
03/18/2025 MAL	Telephone conference with potential bidder and counsel and various follow up discussions.	1.40
03/18/2025 MAL	Review and analysis of draft proposed APAs from bidders	2.20
03/18/2025 MJR	Attention to DIP covenant issues, including correspondence with M. Shiner, BDO and client	0.40
03/18/2025 MAL	Review and analyze DEP requests regarding asset lists and communications with interested parties regarding same.	1.20

03/18/2025 JNK	Multiple communications with client and committee counsel regarding insurance policies (0.3); review/analysis of D&O policy and extensions (0.5)	0.80
03/18/2025 MJR	Attention to issues raised by KeyBank	0.20
03/18/2025 MAL	Various calls and communications regarding DIP budget and preparation for potential winddown issues	1.40
03/18/2025 MJR	Correspondence with creditor regarding alleged lien claim and discuss same with H. Readshaw	0.30
03/18/2025 MAL	Telephone conference with UST regarding BDO retention application and review of documents regarding same.	0.70
03/18/2025 MJR	Review and revise sale related documents submitted by bidders	0.90
03/18/2025 HAR	Review/analyze demand from Fastenal and research regarding same (1); Communication with Fastenal contact with request for more information (.2)	1.20
03/18/2025 LL	Review Corsa schedules (0.2); prepared Amended Schedule G (0.3)	0.50
03/18/2025 MJR	Follow up with new prospective bidder by email and phone	0.30
03/18/2025 DXS	Conference with M. Lindsay and J. Kelly regarding status of sale	0.30
03/18/2025 MJR	Correspondence with various bidders regarding sale and follow up with RFL team regarding sale-related documents, including review of same	1.70
03/18/2025 EBB	Further review and revise APA's.	5.30
03/18/2025 JNK	Prepare for and attend sale status update call with Stikeman.	0.50
03/18/2025 MAL	Various communications with creditors/contract parties regarding sale issues.	0.80
03/18/2025 JNK	Prepare documentation for PA Rapid Response team regarding employee notice (0.5); multiple communications with PA Rapid Response team (0.5); Telephone call with client relating to HR matters (0.4)	1.40
03/18/2025 MAL	Telephone calls with vendor counsel and client discussions regarding factor demand for A/P payments.	1.20
03/18/2025 MAL	Review mechanic's lien details and discussions with client regarding same	1.00
03/19/2025 MAL	Analysis and attention to sale process and issues, various telephone calls and meetings regarding same	3.40

03/19/2025 MJR	Attention to DEP claims and discussion with T. Roeschenthaler regarding same	0.60
03/19/2025 EBB	Conferences with Raines team regarding terms of three Asset Purchase Agreements (.5). Further review and revise APA's (3.8).	4.30
03/19/2025 MJR	Calls and correspondence with counsel for KeyBank and related follow up (1.1)	1.10
03/19/2025 MAL	Review UST comments and caselaw, draft amended declaration in support of BDO retention application and discussions regarding same	1.20
03/19/2025 JNK	Draft setoff stipulation with RFI	1.20
03/19/2025 KJL	Confer with M. Roeschenthaler and M. Lindsay regarding status of auction and strategy as to remaining assets	0.50
03/19/2025 JNK	Discuss case strategy post sales with RFL counsel team.	0.50
03/19/2025 MAL	Review current transaction documents and telephone conference with sale team regarding same	1.60
03/19/2025 MJR	Analysis relating to wind down issues	2.10
03/19/2025 TAR	Research and analysis on issues impacting debtor's post-petition obligations	1.70
03/19/2025 JNK	Review document requests from Committee counsel (0.2); discuss Committee document request with M. Lindsay (0.2); communication with client regarding document requests (0.2)	0.60
03/20/2025 MAL	Review and analyze correspondence from bonding company regarding letter of credit issues, discussions with client regarding same	0.80
03/20/2025 MJR	Engage with potential new bidder and related follow up	0.60
03/20/2025 MJR	Attention to employee-related matters	0.40
03/20/2025 JNK	Revise preliminary sale and omnibus hearing agenda and status of pending matters	0.70
03/20/2025 MAL	Communications and telephone calls with buyers regarding assets and various sale issues	1.90
03/20/2025 JNK	Review/analysis of SII objection to amended contracts notice(0.7); review/analysis of Rockwood objection to amended contracts notice (1.2); discuss amended contract notice objections with M. Lindsay (0.4)	1.90
03/20/2025 MAL	Review form APA and various discussions and telephone calls regarding potential additional bidder	1.60

03/20/2025	MJR	Calls and communications with bidders; BDO and client	2.30
03/20/2025	MAL	Review and analyze DEP claims and issues and telephone call with DEP counsel regarding same	2.30
03/20/2025	JNK	Review APAs and revise the three sale orders relating to purchased assets	2.70
03/20/2025	MAL	Review and analyze asset listings, permits and bonding and telephone conference with BDO regarding status and strategy	1.40
03/20/2025	JNK	Draft notice of filing relating to amended declaration in support of BDO US retention application and review declaration for filing	0.50
03/20/2025	MJR	Calls and communications with liquidators	0.50
03/20/2025	MJR	Call relating to DEP issues and related analysis (0.8); work on DEP related issues and agreement (2.5)	3.30
03/20/2025	JNK	Communications with PA DOL regarding employees.	0.20
03/20/2025	EBB	Prepare for and attend conference call with buyer counsel (.8); further review and revise Asset Purchase Agreements from 3 buyers (5.1)	5.90
03/20/2025	MAL	Review and revise hearing agenda and conferences with J. Kelly regarding same	0.40
03/20/2025	LL	File Amended Declaration and Notice of Preliminary Agenda	0.20
03/20/2025	MAL	Various discussion with counsel and resolution of factoring demand regarding vendor	0.80
03/20/2025	TAR	Research and analysis on issues impacting certain post-petition obligations and related wind down issues	1.80
03/20/2025	MJR	Return calls from potential bidder and discuss same with BDO and client	0.30
03/21/2025	MJR	Correspondence with client regarding DEP issues and follow up regarding same	0.80
03/21/2025	MAL	Review sale documents, asset lists, etc and attention to contract/lease and sale issues	3.30
03/21/2025	TAR	Research and analysis on issues impacting certain post-petition obligations and related winddown issues	4.40
03/21/2025	MJR	Attention to lease issue and correspond with counsel for Penn Coal Land	0.20
03/21/2025	EBB	Further review and revise multiple Asset Purchase Agreements.	3.60

03/21/2025 JNK	Communications with Client regarding Committee discovery requests relating to LCT (0.2); discuss Committee requests with M. Lindsay (0.3)	0.50
03/21/2025 MJR	Calls and correspondence with liquidators and interested parties	0.70
03/21/2025 HAR	Research regarding potential injury claims and noticing issues	3.20
03/21/2025 MJR	Calls and communications regarding sale, sale docs, and related issues with bidders reps, BDO and RFL and related follow up	4.40
03/21/2025 KJL	Confer with M. Roeschenthaler regarding status of auction and bid process	0.20
03/21/2025 KJL	Analysis of correspondence to Debtors from PA DEP (.6); confer with M. Roeschenthaler regarding same (.3); perform legal research regarding applicable Pennsylvania law	1.90
03/21/2025 JNK	Discussion regarding Stelco	0.30
03/22/2025 MAL	Review various additional comments to draft sale orders, analyze same and make additional proposed changes	1.20
03/22/2025 MAL	Various communications with bidders and other interested parties, review and revisions to draft sale orders	1.70
03/22/2025 JNK	Draft responses to committee's document requests (0.6); review documents for production (1.2); discuss responses with M. Lindsay and D. Schimizzi (0.3)	2.10
03/22/2025 MJR	Calls regarding to potential proposals	0.60
03/22/2025 JNK	Research mechanics lien law issue relating to recent inquiry	1.80
03/22/2025 MJR	Attention to DEP issues and related calls with BDO and RFL	0.40
03/22/2025 JNK	Draft response to Rockwood objection and position regarding executory contracts (0.6); communication with M. Lindsay Rockwood objection (0.2); Review communications and analysis contracts from client relating to Cleveland Brothers (0.8); revise second amended contracts list (0.5)	2.10
03/23/2025 MAL	Emails and telephone calls regarding potential interested parties and additional bids	2.10
03/23/2025 TAR	Research and analysis on issues impacting certain post-petition obligations	3.00
03/23/2025 MAL	Emails, analysis and discussions regarding changes to and negotiations of asset lots for current bids	1.60

03/23/2025	MJR	Calls and correspondence regarding sale issues and budget with case parties, RFL team members and BDO	4.00
03/24/2025	MJR	Prepare for and participate in auction, including discussions with case parties, potential bidder, current bidders and consultation parties, including post-auction discussions relating to closing and related items	7.10
03/24/2025	JNK	Draft post auction notice (0.7); draft final sale hearing agenda (0.4)	1.10
03/24/2025	MJR	Meeting with BDO regarding budget and wind down and related follow up	0.60
03/24/2025	JNK	Prepare summary of all sale and contract objections including status (1.3); multiple discussions with RFL team relating to ongoing auction (1.2)	2.40
03/24/2025	KJL	Analysis of Monthly Operating Reports	0.40
03/24/2025	DXS	Meeting with Raines team to discuss preparation for sale hearing (.5); Review and analysis of sale information and auction transcript (1.2); draft declaration in support of sales and correspondence with Raines team regarding the same (2.1)	3.80
03/24/2025	MAL	Review and revise amended draft APAs and various communications regarding same	1.60
03/24/2025	MAL	Review additional bid proposal, APA and schedules and various conferences regarding continued auction	2.50
03/24/2025	JNK	communications with Cleveland Brothers regarding equipment leases	0.20
03/24/2025	MAL	Review and analyze various surety agreements and communications with counsel regarding resolution of assumption notice	1.50
03/24/2025	MJR	Work on sale orders and review bidder correspondence regarding sale	0.40
03/24/2025	MAL	Attention to and various communications regarding sale objection resolutions	1.20
03/24/2025	TAR	Research and analysis on issues relating to DEP claims	5.30
03/24/2025	MAL	Review and revise draft Sale Orders	1.70
03/24/2025	MJR	Call with board chair regarding status	0.20
03/24/2025	MAL	Meetings and analysis regarding DIP budget and DIP Order provisions	1.00

03/24/2025 JNK	Research relating potential appointment of CRO and drafting motion to appoint CRO	3.10
03/24/2025 EBB	Further review and revise Asset Purchase Agreements.	2.70
03/24/2025 KJL	Attend second day of auction of Debtors' assets (.7); analysis of bid documents and confer with K. Harrigan and M. Lindsay regarding same (1.7)	2.40
03/24/2025 JNK	Review/analysis of two statements of mechanics' liens and draft letter to counsel in response.	1.80
03/24/2025 MAL	Review lease agreement and telephone conference with counsel for lessor regarding potential assignment	0.70
03/24/2025 HAR	Analyze issues regarding employee claims (1.4); analyze insurance issues (1.5)	2.90
03/25/2025 DXS	Draft Harrigan declaration in support of sales and correspondence with Raines team regarding the same	1.90
03/25/2025 EBB	Review additional comments to Asset Purchase Agreement and further revise same.	2.30
03/25/2025 DXS	Review and analyze requirements for consulting agreement (1.1); draft consulting agreement for mine consultant and correspondence with Raines team regarding the same (1.3)	2.10
03/25/2025 MJR	Prepare for and participate in board call	1.00
03/25/2025 HAR	Analyze issues regarding employee claims (1.6); analyze insurance issues (1.6)	3.20
03/25/2025 MAL	Communications with creditor regarding mechanic's lien actions and review same.	0.60
03/25/2025 JNK	Finalize final agenda (0.2); review/revise E. Blum declaration in support of sale (0.6); review/revise K. Harrigan declaration in support of sale (0.5)	1.30
03/25/2025 MJR	Calls with client, case professionals, DEP and surety regarding potential global settlement and continue revision to draft agreement	2.90
03/25/2025 JNK	Revise draft responses to committee discovery requests and finalize production of documents	0.70
03/25/2025 TAR	Research and analysis on issues related to DEP claims and winddown	4.20
03/25/2025 MAL	Discussions with client regarding various creditor inquiries	0.50
03/25/2025 MAL	Review correspondence from and address utility issues	0.60

03/25/2025	MAL	Review, analyze and revise buyer APAs and various meetings and communications regarding same	3.80
03/25/2025	MJR	Discussions with BDO regarding sale issues and claims issues, including review of budget and forecasting, attention to wind down issues and related follow up with client (4.5); calls with counsel for KeyBank (0.3)	4.80
03/25/2025	DXS	Meetings with Debtors' professionals to discuss strategy and prepare for sale hearing (.8); review proofs of publication and correspondence with M. Roeschenthaler regarding the same (.3)	1.10
03/25/2025	MJR	Call with counsel for Stelco regarding a/r	0.20
03/25/2025	KJL	Confer with M. Roeschenthaler and M. Lindsay regarding preparation for sale hearing (.6); Review latest draft of APA and attention to email communications regarding same (.3)	0.90
03/25/2025	MAL	Various emails and discussions and review of assets to finalize APA asset lists	2.10
03/25/2025	MJR	Attention to sale issues and correspondence	1.80
03/25/2025	MJR	Correspondence regarding sale orders	0.30
03/25/2025	JNK	Draft board resolution relating to appointment of CRO	1.20
03/25/2025	JNK	RFL team meeting regarding status of sale hearing matters (0.8); review objections to DIP motion (0.4); research relating to objection to expert testimony for sale hearing (1.2)	2.40
03/25/2025	JNK	Communications with Stikeman and discussions with M. Lindsay relating to fee application (0.3); review Stikeman fee summary (0.4)	0.70
03/25/2025	MAL	Attention to contract notice objections and communications regarding resolutions of same	1.00
03/25/2025	JNK	Discussions with M. Lindsay and client regarding changes to second amended contracts list (0.4); finalize second amended contracts list (0.4)	0.80
03/25/2025	MAL	Draft and revise proposed Sale Orders and various communications with buyers regarding same.	1.90
03/25/2025	JNK	Draft motion to expedite CRO motion	1.30
03/26/2025	MAL	Review mechanic's lien filings and meeting and emails with counsel for claimants.	1.20

03/26/2025 DXS	Draft consent motion extending supplemental objection deadline for PA DEP, correspondence with counsel regarding the same, and file (.6); review and analysis of supplemental objections to sale filed by the Committee and INIC (.8); review and analysis of supplemental objection and related declarations filed by PA DEP (2.8); conferences with Debtors' professionals regarding preparation for sale hearing and addressing issues raised in objections to the same (1.2); research and analysis of authority relating to issues raised in supplemental objections (3.1); prepare redlines of final asset purchase agreements for filing with proposed sale orders and review and revise notice of the same (.9); review exhibit binder and supplemental hearing binder for submission to the Court (.4)	9.80
03/26/2025 MAL	Review and finalize resolutions for various objections to sale and contract notices.	2.20
03/26/2025 HAR	Research regarding potential tort claims	2.40
03/26/2025 DXS	Draft notice of filing of revised DIP Budget and correspondence with case parties regarding approval and submission of the same	0.40
03/26/2025 EBB	Review multiple revisions to KIA Asset Purchase Agreement (.8); conference call with KIA counsel regarding same (.4); review and revise Bill of Sale (.5); correspondence with KIA counsel (.3)	2.00
03/26/2025 JNK	Multiple communications with objecting parties relating to second amended contracts notice	0.40
03/26/2025 TAR	Review of DEP's objection to the potential sale of property under 363; follow up discussions with M. Roeschenthaler	0.80
03/26/2025 JNK	Communciation with BDO USA regarding order granting their employment application.	0.20
03/26/2025 JNK	RFL discussion regarding DEP supplemental sale objection and research/analysis related to same	3.70
03/26/2025 MJR	Attention to DEP-related issues and a potential global settlement agreement, including calls with case parties and research relating to the same	5.60
03/26/2025 JNK	Multiple communications relating to pending and outstanding matters for sale hearing (1.1); analysis of Committee's sale objection (0.7); analysis of INIC sale objection (0.6); review revised declarations in support of sales (0.5)	2.90
03/26/2025 RWC	Begin investigation and research concerning transfer/removal of Stelco litigation	3.30
03/26/2025 JNK	Conference call with DIP Lender regarding sale (0.4); draft notice of sale orders and APAs and preparation of sale orders and APAs as exhibits (1.2); prepare amended final agenda (0.4)	2.00

03/26/2025 MJR	Prepare for upcoming sale hearing, including calls with case parties, bidders, review and revision to related documentation; review of supplemental objection filed by the DEP and research and analysis related thereto	9.20
03/26/2025 MAL	Negotiate, revise and finalize APAs, asset lists and sale orders for three (3) sales.	6.20
03/26/2025 TAR	Discussions with M. Roeschenthaler on issues related to DEP claims and follow up email	0.40
03/26/2025 MAL	Review sale pleadings and DEP stay motion and prepare for hearings.	1.60
03/26/2025 JNK	Call with opposing counsel relating to mechanics' liens	0.30
03/26/2025 KJL	Obtain proof of publication of Corsa Coal auction process in Platts publication (.3); attention to Objections to Sale Motion filed by INIC and Committee of Unsecured Creditors (.4); confer with BDO regarding same (.2)	0.90
03/26/2025 JNK	Prepare Stikeman's January and February fee statements and related notices	1.20
03/26/2025 MAL	Review and analyze DEP objection to sale, various discussions and research regarding same.	1.90
03/27/2025 MAL	Prepare for and attend sale hearing and various discussions with parties in relation to hearing.	4.70
03/27/2025 KJL	Assist with hearing prep and follow up with RFL team re post-closing issues	2.60
03/27/2025 RWC	Communications with Canadian counsel (.5); review pleadings from Stelco action (.6); request additional information and materials (.1); continued research on transfer of action to US bankruptcy court (4.3) internal conference regarding potential RTKL request to PaDEP (.3)	5.80
03/27/2025 HAR	Investigate workers comp coverage issues	2.60
03/27/2025 JNK	Preparation for and attend contested sale hearing.	5.80
03/27/2025 LL	Assist attorneys with Sale Hearing prep	2.00
03/27/2025 MAL	Review and revise sale orders and APAs, discussions with multiple parties and coordinate filings.	3.10
03/27/2025 JNK	Communications with PA rapid response team regarding sales	0.20
03/27/2025 MJR	Review legal authority relating to sale objection and prepare reply	2.40

03/27/2025 MJR	Prepare for and attend sale hearing and attend to post-sale issues associated with buyers, lenders and DEP	4.70
03/27/2025 JNK	Prepare revised Rosebud sale order and APA and related certifications of counsel (0.6); Prepare revised LCT sale order and APA and related certifications of counsel (0.6); Prepare revised KIA II sale order and APA and related certifications of counsel (0.6)	1.80
03/27/2025 TAR	Research and analysis in response to DEP's objection to the sale of property under 363(f)	6.70
03/27/2025 DXS	Continue preparing for sale hearing, preparation of exhibits for use at hearing, and preparation of summaries for use at hearing (3.3); review, revise, finalize, and file reply to DEP Objection (.6); attend hearing on sale motion (2.2); follow up conferences with Debtors' professionals regarding strategy and next steps in closing on transactions (.8); attention to preparation of certifications of counsel for sale orders and related asset purchase agreements (.9)	7.80
03/27/2025 MAL	Various discussions with DEP and client regarding certain water related issues and resolutions.	1.50
03/27/2025 LL	File of Certifications of Counsel	0.30
03/28/2025 DXS	Review of entered sale orders and correspondence with J. Kelly regarding service of the same (.7); review and revise notice of entry of sale orders and instruct J. Kelly on filing of the same (.3); attention to preparation of closing checklists for sale closings (.8)	1.80
03/28/2025 RWC	Work on RTKL request to PaDEP (1.4) work on potential transfer of Stelco litigation (2.2)	3.60
03/28/2025 MJR	Calls regarding sale, winddown and environmental issues with client, BDO and case parties and related follow up	3.30
03/28/2025 DXS	Prepare for and attend conference with Rapid Response coordinators regarding status of chapter 11 cases (.5); review of summary to be provided to rapid response coordinators and correspondence with J. Kelly regarding the same (.2)	0.70
03/28/2025 JNK	Discussion stipulation with M. Lindsay (0.2); revise RFI stipulation (0.6)	0.80
03/28/2025 KJL	Research PA DEP Right to Know law (.5); confer with R. Crouch regarding same (.4)	0.90
03/28/2025 JNK	Prepare notice of entry of sale orders	0.50
03/28/2025 MJR	Call with client and BDO regarding budget and related items	0.20
03/28/2025 JNK	Discussion with DRS regarding employees (0.5); conference call with PA rapid response team (0.5); prepare summary of sales for PA rapid response team (0.7)	1.70

03/28/2025	MAL	Attention to and preparation for various winddown and closing issues, telephone calls and meetings regarding same	6.50
03/28/2025	TAR	Review of DEP Objection and analysis of related documents	2.30
03/29/2025	MAL	Attention to and preparation for various sale and closing issues.	2.20
03/30/2025	MAL	Review and revise proposed stipulated cash collateral order and emails regarding same	1.10
03/30/2025	MAL	Various communications and attention to issues for sale closings	1.50
03/30/2025	MJR	Correspond with Eric Blum regarding sales	0.10
03/30/2025	MJR	Review proposed cash collateral stip	0.40
03/31/2025	MJR	Call with client and BDO regarding open items	0.30
03/31/2025	EBB	Review asset purchase agreements regarding closing requirements and prepare closing checklist (1.8); review correspondence from buyer regarding closing items and applicable provisions of APA (.3).	2.10
03/31/2025	MAL	Conference calls and emails with client group, BDO and other interested parties regarding sale, closing and wind down issues.	2.50
03/31/2025	JNK	preparation of proposed orders relating to February fee statements of RFL and BDO	0.30
03/31/2025	DXS	Prepare summary of seller closing deliverables and correspondence with Raines' team regarding the same (.6); Review and analysis of closing checklists for 3 transactions (.7); correspondence with Debtors' professionals regarding preparation for closings (.3); begin gathering information to prepare deliverables for closings (1.7)	3.30
03/31/2025	LL	Review docket for objections to Fee Statements	0.10
03/31/2025	MJR	Call with M. Schiff regarding employment issues (0.1); call with client regarding same (0.1)	0.20
03/31/2025	JNK	Preparation of interim fee application	1.20
03/31/2025	TAR	Review series of emails from client on benefits questions and conduct related research	2.70
03/31/2025	MAL	Conference call with committee counsel and KeyBank counsel and attention to various follow up items.	1.00
03/31/2025	JNK	review/revise certificates of no objection related to RFL and BDO fee statements and review docket.	0.20
03/31/2025	JNK	discussion with M. Lindsay regarding status of matters (0.2); review/revise indemnity agreement (0.4)	0.60

03/31/2025	MAL	Further review and revision to draft stipulated order for use of cash collateral.	0.80
03/31/2025	LL	Prepare CNOs for BDO Consulting (0.1) and Raines (0.1); file same (0.1)	0.30
03/31/2025	RWC	continued research regarding transfer of Stelco case	2.20
03/31/2025	MBS	Multiple emails to/from MJR regarding benefit questions from client. Research record retention, COBRA, 401(k) issues. Prepare for conference call. Email to/from MJR regarding prepared session.	1.60
03/31/2025	JNK	review/revise closing deliverables list	0.60
03/31/2025	KJL	Prepare Indemnity Agreement between Debtors and Rosebud Mining (1.4); attention to revisions and email communications with Debtors and Raines team regarding same (.9)	2.30
03/31/2025	JNK	research related to and preparation of equity holder motion.	3.20
03/31/2025	MAL	Various discussions, emails, review of documents, etc. with buyer parties regarding planning for closing.	3.70
03/31/2025	TAR	Correspond with M. Roeschenthaler on issues related to client's benefit programs; prepare list of questions for client and notes in preparation for call	1.80
Sub-total Fees:			<u>\$508,370.50</u>

Rate Summary

Harry A. Readshaw	15.50 hours at \$665.00/hr	\$10,307.50
Daniel R. Schimizzi	79.20 hours at \$615.00/hr	\$48,708.00
Jesse D. Nelms	2.70 hours at \$425.00/hr	\$1,147.50
Tina A. Roeschenthaler	38.20 hours at \$670.00/hr	\$25,594.00
Mark S. Melickian	2.10 hours at \$865.00/hr	\$1,816.50
Eric B. Blum	42.70 hours at \$845.00/hr	\$36,081.50
Jordan N. Kelly	102.90 hours at \$485.00/hr	\$49,421.50
Matthew B. Schiff	1.60 hours at \$720.00/hr	\$1,152.00
Lela Lescalette	7.90 hours at \$375.00/hr	\$1,275.00
Ronald W. Crouch	14.90 hours at \$825.00/hr	\$12,292.50
Kenneth J. Lund	26.50 hours at \$875.00/hr	\$23,187.50
Sarah Wenrich	10.60 hours at \$575.00/hr	\$6,095.00
Scott M. Hare	1.10 hours at \$920.00/hr	\$1,012.00

Michael J. Roeschenthaler	165.30 hours at \$860.00/hr	\$142,158.00
Mark A. Lindsay	189.90 hours at \$780.00/hr	\$148,122.00
Total hours:	701.10	\$508,370.50

Expenses	Amount
03/01/2025 CT Corporation: Corsa Coal Corp; Inv. #33587476-RI	1,242.00
03/01/2025 CT Lien Solutions: Lien Search for PA/DE for 10 businesses ; Inv. #04110367	14,759.00
03/14/2025 Postage	2.50
Sub-total Expenses:	\$16,003.50

**FIRST INTERIM FEE APPLICATION OF RAINES FELDMAN
LITTRELL, LLP, FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD
JANURARY 6, 2025 THROUGH MARCH 31, 2025**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹ Debtors.	Case No.: 25-70001-JAD Chapter 11 <i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>, Movant, v. NO RESPONDENT.	Doc. No.: Related Doc No.: 164, 229, 359 & 475 Hearing Date: May 21, 2025 Hearing Time: 10:00 AM (EST) Response Deadline: May 7, 2025 at 4:00 PM (EST)

SUMMARY OF FIRST INTERIM FEE APPLICATION OF RAINES FELDMAN LITTRELL, LLP, FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD JANURARY 6, 2025 THROUGH MARCH 31, 2025

Name of applicant:	Raines Feldman Littrell, LLP
Authorized to provide professional services to:	Wilson Creek Energy, LLC, <i>et al.</i>
Petition date:	January 6, 2025
Date of retention:	January 28, 2025, effective as of January 6, 2025, <i>see</i> Doc. No. 192
This is an:	Interim Fee Application
Period for which compensation and reimbursement are sought:	January 6, 2025 – March 31, 2025

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

Compensation Sought as Actual, Reasonable and Necessary:	\$1,375,259.50
Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$36,059.37
Blended Hourly Rate (Interim Application):	\$705.51
Payments Previously Received Pursuant to Fee Statements:	\$1,100,207.60 in fees and \$36,059.37 in expenses
Payment Requested in Connection with Interim Application	\$275,051.90

SUMMARY OF PRIOR MONTHLY FEE STATEMENTS

DATE FILED	PERIOD COVERED	REQUESTED		UNOPPOSED		PAID		HOLDBACK FEES
		FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES	
2/12/2025	1/6/2025 – 1/31/2025	\$430,937.60	\$20,055.87	\$430,937.60	\$20,055.87	\$430,937.60	\$20,055.87	\$107,734.40
3/14/2025	2/1/2025 – 2/28/2025	\$262,573.60	\$0	\$262,573.60	\$0	\$262,573.60	\$0	\$65,643.40
4/11/2025 ¹	3/1/2025 – 3/31/2025	\$406,696.40	\$16,003.50	\$406,696.40	\$16,003.50	\$406,696.40	\$16,003.50	\$101,674.10
	Totals:	\$1,100,207.60	\$36,059.37	\$1,100,207.60	\$36,059.37	\$1,100,207.60	\$36,059.37	\$275,051.90

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

DATE FILED	PERIOD COVERED	ORDER ENTERED	REQUESTED		ALLOWED		PAID	
			FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES
N/A								
		Totals:					\$	

¹ The deadline for objections to this Monthly Fee Statement expires on April 28, 2025. This Interim Application assumes the unopposed fees identified for this Monthly Fee Statement will be paid prior to the hearing on this Interim Application.

COMPENSATION BY PROFESSIONAL

The attorneys who rendered professional services in these Chapter 11 Cases from January 6, 2025 through March 31, 2025 (the “Interim Application Period”) are:

NAME OF PROFESSIONAL	POSITION	DEPT.	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Michael J. Roeschenthaler	Partner	Bankruptcy	2001	\$860.00	349.7	\$300,742.00
Kenneth J. Lund	Partner	Bankruptcy	1991	\$875.00	133.8	\$117,075.00
Eric Blum	Partner	Corporate	1998	\$845.00	42.7	\$36,081.50
Gregg B. Shulklapper	Partner	Corporate	1993	\$925.00	0.8	\$740.00
Keith E. Whitson	Partner	Bankruptcy	1993	\$910.00	1.6	\$1,456.00
Daniel R. Schimizzi	Partner	Bankruptcy	2011	\$615.00	247.5	\$152,212.50
Mark Melickian	Partner	Bankruptcy	1995	\$865.00	2.1	\$1,816.50
Matthew Schiff	Partner	Labor & Employment	1982	\$720.00	1.6	\$1,152.00
Scott Hare	Partner	Litigation	1991	\$920.00	1.1	\$1,012.00
Ronald W. Crouch	Counsel	Bankruptcy	1981	\$825.00	22.5	\$18,562.50

Harry A. Readshaw	Counsel	Bankruptcy	2006	\$665.00	58.4	\$38,836.00
Mark A. Lindsay	Counsel	Bankruptcy	2002	\$780.00	505.7	\$394,446.00
Tina Roeschenthaler	Counsel	Bankruptcy	2001	\$670.00	106	\$71,020.00
Sarah E. Wenrich	Associate	Bankruptcy	2018	\$575.00	174.1	\$100,107.50
Jordan N. Kelly	Associate	Bankruptcy	2020	\$485.00	241.5	\$116,642.50
Jesse D. Nelms	Associate	Litigation	2024	\$425.00	49.4	\$20,995.00
Total for Attorneys:					1,938.5	\$1,372,897.00

The paraprofessionals and other staff who rendered professional services in these Chapter 11 Cases during the Interim Application Period are:

NAME OF PARAPROFESSIONAL OR STAFF MEMBER	POSITION	DEPT.	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Lela M. Lescalette	Paralegal	Bankruptcy	\$375.00	10.8	\$2,362.50
Total for Paraprofessionals and Other Staff:				10.8	\$2,362.50

COMPENSATION BY PROFESSIONAL CATEGORY

PROFESSIONALS	BLENDED RATE	TOTAL HOURS	TOTAL COMPENSATION
Partners	\$784.08	780.9	\$612,287.50
Counsel	\$754.93	692.6	\$522,864.50
Associates	\$511.39	464.9	\$237,745.00
Paralegals	\$299.05	7.9	\$2,362.50
Blended Hourly Rate/Total Fees	\$705.51	1,949.3	\$1,375,259.50
Less Amounts Paid Pursuant to Interim Compensation Order and Fee Statements			\$1,100,207.60
Total Fees Requested			\$275,051.90

COMPENSATION BY PROJECT CATEGORY

NO.	PROJECT CATEGORY	TOTAL HOURS BILLED	TOTAL COMPENSATION
B110	Case Administration	250.9	\$169,128.00
B120	Asset Analysis and Recovery	29.9	\$16,812.50
B130	Asset Disposition	673.2	\$505,354.50
B140	Relief from Stay / Adequate Protection	0.8	\$700.00
B150	Meetings and Communications with Creditors	28.7	\$20,609.50
B160	Fee Applications and Objections to Fee Applications	10.8	\$5,556.00
B170	Employment Applications and Objections	56.2	\$34,563.50
B185	Assumption / Rejection of Leases	88.6	\$54,772.00

B190	Other Contested Matters and Omnibus Hearings	395.4	\$254,855.50
B200	Adversary Actions	3.4	\$3,031.00
B205	State Court Matters	11.3	\$7,132.00
B210	Business Operations	165	\$124,479.50
B220	Employee Benefits	20.6	\$13,692.00
B230	Financing/ Cash Collateral	58	\$43,012.50
B235	Financial Filings	10.5	\$9,187.50
B240	Tax Issues	2.9	\$2,494.00
B250	Real Estate	3.2	\$2,493.50
B260	Board of Directors Matters	8.6	\$6,073.00
B310	Claims Administration and Objections	83.4	\$65,193.50
B320	Plan and Disclosure Statement	47.1	\$34,433.50
B410	Restructuring	1.1	\$946.00
E124	*Time accidently billed as an expense.	0.8	\$740.00
	TOTAL:	1,949.3	\$1,375,259.50
	Less Amounts Paid Pursuant to Interim Compensation Order and Fee Statements		\$1,100,207.60
	Total Fees Requested		\$275,051.90

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,³	Chapter 11
Debtors.	<i>Jointly Administered</i>
	Doc. No.:
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Related to Document No.: 164, 229, 359
Movant,	& 475
v.	Hearing Date: May 21, 2025
NO RESPONDENT.	Hearing Time: 10:00 AM (EST)
	Response Deadline: May 7, 2025 at 4:00 PM (EST)

**FIRST INTERIM FEE APPLICATION OF RAINES FELDMAN LITTRELL, LLP, FOR
PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF JANURARY 6, 2025 THROUGH MARCH 31, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, rule 2016 of the Federal Rules of Bankruptcy Procedure, rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Western District of Pennsylvania, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [Doc. No. 164] (the “Interim Compensation Order”), Raines Feldman Littrell, LLP (“Raines”), local counsel for the Debtors, hereby files this *First Interim Fee Application of Raines Feldman*

³ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

Littrell, LLP for Payment of Compensation and Reimbursement of Expenses for the Period of January 6, 2025 Through March 31, 2025 (the “Interim Application”), seeking the allowance and approval of compensation on an interim basis for professional services rendered to the Debtors, and for reimbursement of actual and necessary expenses incurred in connection therewith for the period commencing January 6, 2025, through and including March 31, 2025 (the “Interim Application Period”), and in support thereof respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are sections 330, 331, 503(b)(2), and 507(a)(2) of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

STATUS OF THE CHAPTER 11 CASES

3. On January 6, 2025 (the “Petition Date”), the Debtors filed voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code. A description of the Debtors’ business, corporate structure, and events leading to the Debtors’ chapter 11 cases is set forth in the *Amended Declaration of Kevin Harrigan, Chief Executive Officer of Wilson Creek Energy, LLC and its Affiliated Debtors, in Support of Chapter 11 Petitions and Various First Day Motions* [Doc. No. 51-1] and is incorporated herein by reference.

4. The Debtors are authorized to operate their businesses and manage their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. As of the date hereof, no trustee or examiner has been appointed in the Chapter 11 Cases.

5. On January 24, 2025, the United States Trustee for the Western District of Pennsylvania appointed an official committee of unsecured creditors in these Chapter 11 Cases (the “Committee”) pursuant to section 1102 of the Bankruptcy Code.

6. Since the filing of these Chapter 11 Cases, the Debtors have maintained their on-going operations as debtors-in-possession. In order to continue operations until the closing on the Debtors’ anticipated asset sales, Raines assisted the Debtors and their other professionals in obtaining Court approval of debtor-in-possession financing facilities and numerous motions to ensure continued, uninterrupted operations of the Debtors’ mines and facilities. Raines has also taken other actions that were reasonable and necessary in connection with the administration of these Chapter 11 Cases.

7. On January 16, 2025, the Debtors sought and obtained Court-authority of a bidding procedures and sale process. *See* Doc. Nos. [116 & 193]. Following conclusion of the sale process, on March 27, 2025, the Court entered three sale orders [Doc. Nos. 429, 430 and 431] (collectively, the “Sale Orders”), authorizing the sale of certain of the Debtors’ assets (the “Sales”). The three transactions closed effective April 4, 2025. [Doc. No. 479] (the “Closings”).

BACKGROUND RELEVANT TO INTERIM APPLICATION

8. On January 28, 2025, this Court entered an Order (the “Retention Order”) authorizing Raines’ retention with respect to the Debtors as of January 6, 2025. A copy of the Retention Order is attached hereto as **Exhibit A**.

9. On January 27, 2025, this Court entered the Interim Compensation Order [Doc. No. 164] pursuant to which Raines is authorized to file monthly fee statements. Pursuant to the Interim

Compensation Order, the Debtors are authorized to pay an amount equal to 80% of the fees and 100% of the expenses requested in the monthly fee statements that are not subject to an objection.

10. Pursuant to the Interim Compensation Order, Raines submitted the following monthly fee statements (collectively, the “Monthly Fee Statements”) to the notice parties within the Interim Application Period, which Monthly Fee Statements are incorporated by reference in their entirety:

- a. Pursuant to the *Monthly Fee Statement of Raines Feldman Littrell, LLP, for the Period from January 6, 2025 Through January 31, 2025* [Doc No. 229], filed on February 12, 205, Raines requested authorization to be paid by the Debtors in an amount equal to 80% of the compensation for professional services rendered during the applicable period in the amount of \$430,937.60 (80% of \$538,672.00) and 100% reimbursement of expenses in the amount of \$20,055.87.
- b. Pursuant to the *Monthly Fee Statement of Raines Feldman Littrell, LLP, for the Period from February 1, 2025 Through February 28, 2025* [Doc. No. 359], filed on March 14, 2025, Raines requested authorization to be paid by the Debtors in an amount equal to 80% of the compensation for professional services rendered during the applicable period in the amount of \$262,573.60 (80% of \$328,217.00) and 100% reimbursement of expenses in the amount of \$0.
- c. Pursuant to the *Monthly Fee Statement of Raines Feldman Littrell, LLP, for the Period from March 1, 2025 Through March 31, 2025* [Doc. No. 475] filed on

April 11, 2025, Raines requested authorization to be paid by the Debtors in an amount equal to 80% of the compensation for professional services rendered during the applicable period in the amount of \$406,696.40 (80% of \$508,370.50) and 100% reimbursement of expenses in the amount of \$16,003.50

11. No party objected to the Monthly Fee Statements. The amount of compensation sought in this Interim Application already paid to Raines pursuant to the Interim Compensation Order is \$1,100,207.60. This Interim Application also seeks allowance and payment of the holdback from the prior Monthly Fee Statements of \$275,051.90.

INTERIM APPLICATION

12. Pursuant to the Interim Compensation Order, Raines hereby requests interim approval and allowance of compensation and reimbursement of expenses for all amounts already paid pursuant to the Monthly Fee Statements, in the total amount of \$1,100,207.60 and further requests allowance and payment of \$275,051.90, representing the 20% holdback from the Monthly Fee Statements, for a total payment of \$1,375,259.50, as compensation for professional services rendered during the Interim Application Period.

13. The Interim Application is supported by the following Exhibits:

- a. **Exhibit B** contains a summary schedule of the time expended by all Raines professionals engaged in the representation of the Debtors during the Interim Application Period.
- b. **Exhibit C** contains a summary schedule of hours and fees covered by this Interim Application, categorized by project code.

- c. **Exhibit D** contains the Monthly Fee Statements filed by Raines during the Interim Application Period, including the invoices with (i) a detailed itemization of the service hours expended by matter and professional and (ii) a summary schedule of hours and fees categorized by project code (collectively, the “Invoices”). The Invoices also include a detailed chronological itemization of the services rendered by each professional and paraprofessional, calculated by tenths of an hour and categorized in accordance with the appropriate project code.
- d. **Exhibit E** contains a disclosure of “customary and comparable compensation” charged by Raines’ professionals. As set forth in ¶ C.3 of the Appendix B Guidelines, Exhibit E provides a summary of the blended hourly rates of the timekeepers (segregated by rank) included in this Application compared to the blended hourly rates charged by similar non-bankruptcy timekeepers at Raines.

**SUMMARY OF PROFESSIONAL COMPENSATION AND
REIMBURSEMENT OF EXPENSES REQUESTED**

14. During the Interim Application Period, Raines, by and through its professionals and paraprofessionals, has performed all necessary professional services which are described and narrated in detail below and set forth in Raines’ Invoices.

15. Raines has not entered into any agreement, express or implied, with any other party for the purpose of fixing or sharing fees or other compensation to be paid for professional services rendered in this case. No promises have been received by Raines as to compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code.

16. Raines is a disinterested party and does not represent or hold an interest adverse to the interests of the Debtors' estates on the matters for which it was retained.

17. The fees charged by Raines are billed in accordance with its existing billing rates and procedures in effect during the Interim Application Period. The rates Raines charges for services rendered by its professionals and paraprofessionals for this engagement are no greater than the rates that Raines charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market.

18. The Invoices that chronologically list the time (broken down by tenths of an hour) and services rendered by Raines for each of the categories of activities during the Interim Application Period are included with the Monthly Fee Statements, which are attached hereto as Exhibit D.

SUMMARY OF SERVICES

At the commencement of Raines' engagement, Raines created different subject matter categories to which its professionals billed their time on behalf of the Debtors. Below is a brief description of each of the matters for which Raines professionals billed time or incurred expenses on behalf of the Debtors during the Interim Application Period. Also included is the aggregate amount of fees incurred for each subject matter category.

A. B110 - Case Administration

19. Time billed by Raines under this task code includes time devoted to the efficient and expeditious administration of these Chapter 11 Cases. Work performed under this category includes: (a) development of case strategies and (b) general case administration, including responding to inquiries from the United States Trustee, the Court, the Clerk for the United States Bankruptcy Court for the Western District of Pennsylvania, the Committee, and creditors of the Debtors.

Total Hours	Total Fees
250.9	\$169,128.00

B. B120 – Asset Analysis and Recovery

20. Time billed by Raines under this task code includes research and analysis of the Debtors' assets.

Total Hours	Total Fees
29.9	\$16,812.50

C. B130 – Asset Disposition

21. Time billed by Raines under this task code includes the reasonable fees incurred in assisting and advising the Debtors in connection with three sales of substantially all assets of the Debtors. These transaction were approved upon entry of three separate Sale Orders and closed on April 4, 2025. Raines has served as the Debtors' counsel with respect to all negotiations, auctions, and hearings relating to all three sales and worked with all buyers on their respective Sale Orders.

Raines also worked collaboratively with all parties on negotiation and completing all sale documents necessary to complete the closing on the sales pursuant to the Sale Order.

Total Hours	Total Fees
673.2	\$505,354.50

D. B140 – Relief From Stay / Adequate Protection

22. Time billed by Raines under this task code related to the reasonable fees incurred in connection with research and discussions pertaining to motions to enforce automatic stay.

Total Hours	Total Fees
0.8	\$700.00

E. B150 – Meetings and Communications with Creditors

23. Time billed by Raines under this task code relates to the reasonable fees incurred for meetings and communications with creditors and all research and strategic discussions pertaining to same.

Total Hours	Total Fees
28.7	\$20,609.50

F. B160 – Fee Applications and Objections to Fee Applications

24. Time billed by Raines under this task code includes the reasonable fees incurred for preparing and filing its Monthly Fee Statements, and other of the Debtors' professionals Monthly Fee Statements, including review and analysis of proforma invoices, incorporating

adjustments based on the time and complexity of the issues involved, and the preparation of supporting documentation for submission to the Court. The fees related with this category also include fees incurred relating to the review and analysis of all fee statements filed in these Chapter 11 Cases and correspondence regarding the same

Total Hours	Total Fees
10.8	\$5,556.00

G. B170 – Employment Applications and Objections

25. Time billed by Raines under this task code includes the reasonable fees incurred in connection with the preparation of Raines’ employment application and other of the Debtors’ professionals’ employment applications. This includes review and analysis of conflict reports and correspondence with the United States Trustee to address questions and concerns regarding the same, as well as revisions to proposed orders pertaining to same.

Total Hours	Total Fees
56.2	\$34,563.50

H. B185 – Assumption / Rejection of Leases

26. Time billed by Raines under this task code includes the reasonable fees incurred in connection with the preparation of notices of contract assumption and assignment including review and analysis of contract objections and negotiations and communications with objecting parties.

Total Hours	Total Fees
88.6	\$54,772.00

I. B190 – Other Contested Matters and Omnibus Hearings

27. Time billed by Raines under this task code includes the reasonable fees incurred by Raines in connection with miscellaneous Hearings and other contested matters filed in these Chapter 11 Cases. The fees incurred includes the reasonable time necessary for review and analysis of, and preparation for, contested matters filed in these chapter 11 Cases, including assisting in the preparation of Debtors’ responses to the same, as necessary, and attendance at related hearings.

Total Hours	Total Fees
395.4	\$254,855.50

J. B200 – Adversary Actions

Time billed by Raines under this task code includes the reasonable fees incurred in connection with the reviewing and analyzing a pending litigation matter and analyzing bond issues and was inadvertently billed to the B200 task code.

Total Hours	Total Fees
3.4	\$3,031.00

K. B205 – State Court Matters

28. Time billed by Raines under this task code includes the reasonable fees incurred in connection with state court matters. This includes correspondence with opposing counsel regarding pending state court matters and preparing and filing suggestions of bankruptcy for

various ongoing actions. This also includes time spent researching matters relating to mechanics' liens and corresponding with opposing counsel regarding the same.

Total Hours	Total Fees
11.3	\$7,132.00

L. B210 – Business Operations

29. Time billed by Raines under this task code includes the reasonable fees incurred in connection with the Debtors' business operations. This includes review and analysis of various concerns pertaining to the Debtors' ongoing business and correspondence with parties regarding same.

Total Hours	Total Fees
165	\$124,479.50

M. B220 – Employee Benefits/ Pensions

Time billed by Raines under this task code includes the reasonable fees incurred in connection with coordinating employee matters with the client, time spent researching and drafting the Debtors' WARN notice, and communications with state and local officials regarding employee matters.

Total Hours	Total Fees
20.6	\$13,692.00

N. B230 – Financing / Cash Collateral

30. Time billed by Raines under this task code includes the reasonable fees incurred in connection with the Debtors' post-petition financing. This includes review and analysis the proposed financing terms, correspondence and meetings with various professionals to negotiate consensual orders, and preparation for and attendance at hearings pertaining to same.

Total Hours	Total Fees
58	\$43,012.50

O. B235 – Financial Filings

31. Time billed by Raines under this task code includes the reasonable fees incurred in connection with reviewing, analyzing, and preparing the Debtors' schedules of assets and liabilities and statements of financial affairs. This time was originally billed to the B235 task code but may be more appropriately categorized under task code B110.

Total Hours	Total Fees
10.5	\$9,187.50

P. B240 – Tax Issues

32. Time billed by Raines under this task code includes the reasonable fees incurred in connection with discussions between Debtors' counsel and Debtors' professionals relating to an analysis of the Debtors' net operating losses in connection with a plan of reorganization.

Total Hours	Total Fees
2.9	\$2,494.00

Q. B250 – Real Estate

Time billed by Raines under this task code includes the reasonable fees incurred in connection with analysis of lease, permitting and bond issues.

Total Hours	Total Fees
3.2	\$2,493.50

R. B260 – Board of Directors Matters

Time billed by Raines under this task code includes the reasonable fees incurred in connection with attending Board of Director meetings.

Total Hours	Total Fees
8.6	\$6,073.00

S. B310 – Claims Administration and Objections

33. Time billed by Raines under this task code includes the reasonable fees incurred in connection with analyzing, discussing, and negotiating with respect to potential and asserted claims against the Debtors' estates, including tort claims, contract claims and environmental obligations.

Total Hours	Total Fees
83.4	\$65,193.50

T. B320 – Plan and Disclosure Statement

34. Time billed by Raines under this task code include the reasonable fees incurred in connection with the Debtors strategic option to file a plan of reorganization. Prior to the sale of substantially all the Debtors' assets, the Debtors were exploring dual pathways including consideration and analysis of a potential plan of reorganization.

Total Hours	Total Fees
47.1	\$34,433.50

U. B410 – Restructuring

35. Similar to time billed under task code B320, time billed by Raines under this task code include the reasonable fees incurred in connection with the Debtors strategic option to file a plan of reorganization. This time was originally billed to the B410 task code, but may be more appropriately categorized under task code B320.

Total Hours	Total Fees
1.1	\$946.00

CONCLUSION

36. The foregoing professional services performed by Raines were necessary and appropriate with respect to its representation of the Debtors in these Chapter 11 Cases. Compensation for the foregoing services as requested is commensurate with the complexity, importance, and skill required to address the problems, issues, and/or tasks involved.

RESERVATION OF RIGHTS

37. To the extent that Raines determines that any fees and/or expenses related to this Interim Application Period have been inadvertently excluded from this Interim Application, Raines reserves all rights to include any such fees and/or expenses in future fee applications.

WHEREFORE, Raines respectfully requests that this Court enter an Order, substantially in the form attached hereto as **Exhibit F**: (i) granting allowance and approval of compensation for professional services rendered to the Debtors during the Interim Application Period in the total amount of \$1,375,259.50 and reimbursement of expenses billed during the Interim Application Period in the amount of \$36,059.37; (ii) authorizing and directing the Debtors to pay Raines the amount of \$275,051.90, representing the total compensation sought in connection with this Interim Application after applying credit for amounts previously paid to Raines by the Debtors (\$1,100,207.60) pursuant to the Monthly Fee Statements; and (iii) granting such other and further relief as may be just and proper.

Respectfully submitted,

Dated: April 23, 2025

RAINES FELDMAN LITRELL, LLP

By: /s/ Michael J. Roeschenthaler

Michael J. Roeschenthaler (PA ID No. 87647)

Kenneth J. Lund (PA ID No. 63468)

Mark A. Lindsay (PA ID No. 89487)

Daniel R. Schimizzi (PA ID No. 311869)

11 Stanwix Street, Suite 1100

Pittsburgh, PA 15222

Telephone: 412-899-6462

Email: mroeschenthaler@raineslaw.com

klund@raineslaw.com

mlindsay@raineslaw.com

dschimizzi@raineslaw.com

Counsel to the Debtors and Debtors in Possession

Retention Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related to Document No.: 137
v.	Hearing Date: January 28, 2025
NO RESPONDENT.	Hearing Time: 10:00 AM (EST)
	Response Deadline: 12:00 PM (EST)
	January 27, 2025

**ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF RAINES
FELDMAN LITRELL LLP AS COUNSEL FOR THE DEBTORS
NUNC PRO TUNC TO THE PETITION DATE**

Upon the amended application (the “Application”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for the entry of an order (this “Order”) authorizing the Debtors to retain and employ Raines Feldman Littrell LLP (“Raines”) as counsel *effective nunc pro tunc* to the Petition Date, pursuant to sections 327(a) and 330 of title 11 of the United States Code (as amended, the “Bankruptcy Code”), Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-l of the Local Rules for

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holding, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Application.

the Western District of Pennsylvania (the “Local Rules”); and the Court being satisfied based on the representations made in the Application and in the Roeschenthaler Declaration that Raines represents no interest adverse to the Debtors’ estates with respect to the matters upon which they are to be engaged, that they are disinterested persons as that term is defined under section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, and that their employment is necessary and in the best interests of the Debtors’ estates; the terms set forth in the Application are reasonable terms for the purposes of section 328(a) of the Bankruptcy Code; and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided; and it appearing that no other or further notice need be provided; and after due deliberation and sufficient cause appearing therefore, it is hereby ordered that:

1. The Application is **GRANTED** as provided herein.
2. In accordance with sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rule 2016-1, the Debtors are authorized to employ and retain Raines as Counsel to the Debtors on the terms set forth in the Application as modified by this Order.
3. Raines shall be compensated in accordance with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, this Order and any other applicable orders of this Court.
4. Raines shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Debtors’ chapter 11 cases in compliance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other

applicable procedures and orders of the Court. Raines also shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under United States Code by Attorneys in Larger Chapter 11 Cases, both in connection with the Application and the interim and final fee applications to be filed by Raines in these chapter 11 cases.

5. At least ten (10) business days prior to applying any increases in its hourly rates beyond the rates set forth in the Application, Raines shall file with the Court a notice of such increases and serve such notice on the master service list. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in Section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

6. Notwithstanding anything in the Application or this Order to the contrary, Raines shall apply any remaining amounts of any advance payment retainer(s) as of the Petition Date toward postpetition fees and expenses, after postpetition fees and expenses are approved pursuant to an order of Court.

7. The Debtors and Raines are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Application.

8. Notice of the Application as provided therein is deemed to be good and sufficient notice of such Application, and the requirements of the Local Rules are satisfied by the contents of the Application.

9. To the extent the Application or the Roeschenthaler Declaration are inconsistent with this Order, the terms of this Order shall govern.

10. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

11. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Prepared by:

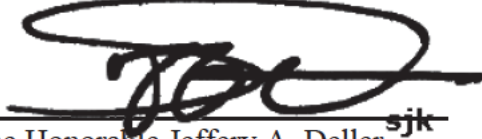
/s/Michael J. Roeschenthaler

Michael J. Roeschenthaler, Proposed Counsel to the Debtors

Date: January 28, 2025

Pittsburgh, PA

BY THE COURT:


The Honorable Jeffery A. Deller
United States Bankruptcy Judge

FILED
1/28/25 2:52 pm
CLERK
U.S. BANKRUPTCY
COURT - WDPA

Notice Recipients

District/Off: 0315-7	User: auto	Date Created: 1/28/2025
Case: 25-70001-JAD	Form ID: pdf900	Total: 4

Recipients of Notice of Electronic Filing:

aty	Daniel R. Schimizzi	dschimizzi@raineslaw.com
aty	Mark A. Lindsay	mlindsay@raineslaw.com
aty	Michael J. Roeschenthaler	mroeschenthaler@raineslaw.com
aty	Sarah Elizabeth Wenrich	swenrich@raineslaw.com

TOTAL: 4

Exhibit B

Summary Schedule of Time by Professional

COMPENSATION BY PROFESSIONAL

The attorneys who rendered professional services in these Chapter 11 Cases from January 6, 2025 through March 31, 2025 (the “Interim Application Period”) are:

NAME OF PROFESSIONAL	POSITION	DEPT.	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Michael J. Roeschenthaler	Partner	Bankruptcy	2001	\$860.00	349.7	\$300,742.00
Kenneth J. Lund	Partner	Bankruptcy	1991	\$875.00	133.8	\$117,075.00
Eric Blum	Partner	Corporate	1998	\$845.00	42.7	\$36,081.50
Gregg B. Shulklapper	Partner	Corporate	1993	\$925.00	0.8	\$740.00
Keith E. Whitson	Partner	Bankruptcy	1993	\$910.00	1.6	\$1,456.00
Daniel R. Schimizzi	Partner	Bankruptcy	2011	\$615.00	247.5	\$152,212.50
Mark Melickian	Partner	Bankruptcy	1995	\$865.00	2.1	\$1,816.50
Matthew Schiff	Partner	Labor & Employment	1982	\$720.00	1.6	\$1,152.00
Scott Hare	Partner	Litigation	1991	\$920.00	1.1	\$1,012.00
Ronald W. Crouch	Counsel	Bankruptcy	1981	\$825.00	22.5	\$18,562.50

Harry A. Readshaw	Counsel	Bankruptcy	2006	\$665.00	58.4	\$38,836.00
Mark A. Lindsay	Counsel	Bankruptcy	2002	\$780.00	505.7	\$394,446.00
Tina Roeschenthaler	Counsel	Bankruptcy	2001	\$670.00	106	\$71,020.00
Sarah E. Wenrich	Associate	Bankruptcy	2018	\$575.00	174.1	\$100,107.50
Jordan N. Kelly	Associate	Bankruptcy	2020	\$485.00	241.5	\$116,642.50
Jesse D. Nelms	Associate	Litigation	2024	\$425.00	49.4	\$20,995.00
Total for Attorneys:					1,938.5	\$1,372,897.00

The paraprofessionals and other staff who rendered professional services in these Chapter 11 Cases during the Interim Application Period are:

NAME OF PARAPROFESSIONAL OR STAFF MEMBER	POSITION	DEPT.	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Lela M. Lescalette	Paralegal	Bankruptcy	\$375.00	10.8	\$2,362.50
Total for Paraprofessionals and Other Staff:				10.8	\$2,362.50

Exhibit C

Summary Schedule of Time by Task Code

COMPENSATION BY PROJECT CATEGORY

NO.	PROJECT CATEGORY	TOTAL HOURS BILLED	TOTAL COMPENSATION
B110	Case Administration	250.9	\$169,128.00
B120	Asset Analysis and Recovery	29.9	\$16,812.50
B130	Asset Disposition	673.2	\$505,354.50
B140	Relief from Stay / Adequate Protection	0.8	\$700.00
B150	Meetings and Communications with Creditors	28.7	\$20,609.50
B160	Fee Applications and Objections to Fee Applications	10.8	\$5,556.00
B170	Employment Applications and Objections	56.2	\$34,563.50
B185	Assumption / Rejection of Leases	88.6	\$54,772.00
B190	Other Contested Matters and Omnibus Hearings	395.4	\$254,855.50
B200	Adversary Actions	3.4	\$3,031.00
B205	State Court Matters	11.3	\$7,132.00
B210	Business Operations	165	\$124,479.50
B220	Employee Benefits	20.6	\$13,692.00
B230	Financing/ Cash Collateral	58	\$43,012.50
B235	Financial Filings	10.5	\$9,187.50
B240	Tax Issues	2.9	\$2,494.00
B250	Real Estate	3.2	\$2,493.50
B260	Board of Directors Matters	8.6	\$6,073.00
B310	Claims Administration and Objections	83.4	\$65,193.50
B320	Plan and Disclosure Statement	47.1	\$34,433.50
B410	Restructuring	1.1	\$946.00
E124	*Time accidentally billed as an expense.	0.8	\$740.00
	TOTAL:	1,949.3	\$1,375,259.50
	Less Amounts Paid Pursuant to Interim Compensation Order and Fee Statements		\$1,100,207.60
	Total Fees Requested		\$275,051.90

Exhibit D

Previously Filed Fee Statements

Previously Filed Fee Statements

- 1) *Monthly Fee Statement of Raines Feldman Littrell, LLP for the Period of January 6, 2025 through January 31, 2025 (Doc. No. 229)*
- 2) *Monthly Fee Statement of Raines Feldman Littrell, LLP for the Period of February 1, 2024 through February 28, 2025 (Doc. No. 359)*
- 3) *Monthly Fee Statement of Raines Feldman Littrell, LLP for the Period of March 1, 2025 through March 31, 2025 (Doc. No. 475)*

Exhibit E

Customary and Comparable Compensation

Exhibit E

Customary and Comparable Compensation

Category of Timekeeper	Blended Hourly Rate	
	Billed Firm-wide for preceding year (4/23/24 to 4/23/25)	Billed This Application
Partner	\$801.50	\$784.08
Counsel	\$710.00	\$754.93
Associate	\$505.50	\$511.39
Aggregated	\$672.33	\$683.47

Exhibit F

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD Chapter 11
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	<i>Jointly Administered</i>
Debtors.	Doc. No.:
	Hearing Date: May 21, 2025
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Hearing Time: 10:00 AM (EST)
Movant,	Response Deadline: May 7, 2025 at
v.	4:00PM (EST)
NO RESPONDENT.	

ORDER OF THE COURT

AND NOW, this ____ day of _____, 2025, upon due consideration of the foregoing *First Interim Fee Application of Raines Feldman Littrell, LLP, for Payment of Compensation and Reimbursement of Expenses for the Period of January 6, 2025 through March 31, 2025* (the “Interim Application”) filed by Raines Feldman Littrell, LLP, counsel to the above-captioned debtors (collectively, the “Debtors”), and the Court having reviewed the Interim Application and any objections filed thereto; and the Court finding that: (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (ii) venue of these chapter 11

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

cases and the Application is proper under 28 U.S.C. §§ 1408 and 1409; (iii) notice of the Interim Application, the opportunity to object, and for the hearing thereon was provided and sufficient under the circumstances; and (iv) based on the forgoing, no further notice or hearing is required and good cause exists to grant the relief requested in the Interim Application,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Interim Application is **APPROVED** as set forth herein.
2. Raines Feldman Littrell, LLP, is allowed interim compensation for professional services rendered to the Debtors during the Interim Application Period in the amount of \$1,375,259.50 and reimbursement of expenses billed during the Interim Application Period in the amount of \$36,059.37.
3. The Debtors are authorized to forthwith pay Raines Feldman Littrell, LLP, \$275,051.90, representing the compensation approved pursuant to this Order as reduced by the amounts previously received by Raines (\$1,100,207.60) pursuant to the Monthly Fee Statements.
4. The interim allowance of such compensation and reimbursement of expenses is without prejudice to the rights of Raines Feldman Littrell, LLP, to seek such further compensation for the full value of services performed and expenses incurred.
5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

Prepared by: /s/ Michael J. Roeschenthaler
Michael J. Roeschenthaler, Counsel to the Debtors

BY THE COURT

The Honorable Jeffrey A. Deller
United States Bankruptcy Court

**Monthly Fee Statement of Raines Feldman Littrell, LLP for the
Period of April 1, 2025 April 30, 2025**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related to Document No.:164
v.	Hearing Date:
NO RESPONDENT.	Hearing Time:
	Response Deadline:

**SUMMARY OF MONTHLY FEE STATEMENT OF RAINES FELDMAN LITTRELL
LLP FOR THE PERIOD FROM APRIL 1, 2025 THROUGH APRIL 30, 2025**

Name of applicant:	Raines Feldman Littrell, LLP
Authorized to provide professional services to:	The Debtors
Petition Date:	January 6, 2025
Date of Retention:	January 28, 2025, effective as of January 6, 2025, see Doc. No. 192
This is a	Fee Statement
Period for which compensation and reimbursement are sought:	April 1, 2025, through April 30, 2025
Amount of compensation sought as actual, reasonable, and necessary:	\$214,184.00 (representing 80% of the total fees of \$267,730.00)

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors' address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

Amount of expense reimbursement sought as actual, reasonable, and necessary: \$3,634.35

Blended hourly rate for this fee statement: \$686.84

SUMMARY OF PRIOR MONTHLY FEE APPLICATIONS

DATE FILED	PERIOD COVERED	REQUESTED		UNOPPOSED		PAID		HOLDBACK FEES
		FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES	
2/12/2025	1/6/2025 – 1/31/2025	\$430,937.60	\$20,055.87	\$430,937.60	\$20,055.87	\$430,937.60	\$20,055.87	\$107,734.00
3/14/2025	2/1/2025 – 2/28/2025	\$262,573.60	\$0	\$262,573.60	\$0	\$262,573.60	\$0	\$65,643.40
4/11/2025	3/1/2025 – 3/31/2025	\$406,696.40	\$16,003.50	\$406,696.40	\$16,003.50	\$406,696.40	\$16,003.50	\$101,674.10
	Totals:	\$1,100,207.60	\$36,059.37	\$1,100,207.60	\$36,059.37	\$1,100,207.60	\$36,059.37	\$275,051.90

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

DATE FILED	PERIOD COVERED	ORDER ENTERED	REQUESTED		ALLOWED		PAID	
			FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES
4/23/2025	1/6/2025 – 3/31/2025	N/A ¹	\$267,730.00	\$3,634.35				
		Totals:	\$267,730.00	\$3,634.35				

¹ The deadline for objecting to the *First Interim Fee Application of Raines Feldman Littrell LLP for Payment of Compensation and Reimbursement of Expenses for the Period of January 6, 2025 through March 31, 2025* was May 7, 2025 (the “Interim Fee Application”). No objections were filed. A Certificate of No Objection was filed on May 7, 2025 requesting that the Court enter an order approving the Interim Fee Application.

COMPENSATION BY PROFESSIONAL

The attorneys who rendered professional services in these Chapter 11 Cases from April 1, 2025 through April 30, 2025 (the “Fee Period”) are:

NAME OF PROFESSIONAL	POSITION	DEPT.	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Michael J. Roesenthaler	Partner	Bankruptcy	2001	\$860.00	18.3	\$15,738.00
Kenneth J. Lund	Partner	Bankruptcy	1991	\$875.00	2.2	\$1,925.00
Eric Blum	Partner	Corporate	1998	\$845.00	4.1	\$3,464.50
Matthew Schiff	Partner	Labor & Employment	1982	\$720.00	13.1	\$9,432.00
Daniel R. Schimizzi	Partner	Bankruptcy	2011	\$615.00	15.9	\$9,778.50
Ronald W. Crouch	Counsel	Bankruptcy	1981	\$825.00	49.9	\$41,167.50
Mark A. Lindsay	Counsel	Bankruptcy	2002	\$780.00	149.1	\$116,298.00
Harry A. Readshaw	Counsel	Bankruptcy	2006	\$665.00	4.9	\$3258.50
Tina A. Roesenthaler	Counsel	Bankruptcy	2001	\$670.00	15.1	\$10,117.00
Sarah E. Wenrich	Associate	Bankruptcy	2018	\$575.00	1.0	\$575.00
Jordan N. Kelly	Associate	Bankruptcy	2020	\$485.00	105.7	\$51,265.50
Total for Attorneys:					379.3	\$263,018.50

The paraprofessionals and other staff who rendered professional services in these Chapter 11 Cases during the Fee Period are:

NAME OF PARAPROFESSIONAL OR STAFF MEMBER	POSITION	DEPT.	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Michael Sally	Paralegal	Corporate	\$465.00	8.6	\$3,999.00
Lela M. Lescallette	Paralegal	Bankruptcy	\$375.00	1.9	\$712.50
Total for Paraprofessionals and Other Staff:				10.5	\$4,711.50

COMPENSATION BY PROFESSIONAL CATEGORY

PROFESSIONALS	BLENDED RATE	TOTAL HOURS	TOTAL COMPENSATION
Partners	\$752.57	53.6	\$40,338.00
Counsel	\$780.09	219	\$170,841.00
Associates	\$485.81	106.7	\$51,836.50
Paralegals	\$448.71	10.5	\$4,711.50
Blended Hourly Rate/Total Fees	\$686.84	389.8	\$267,730.00
Less 20% Holdback			\$214,184.00
Total Fees Requested			\$267,730.00

COMPENSATION BY PROJECT CATEGORY

NO.	PROJECT CATEGORY	TOTAL HOURS BILLED	TOTAL COMPENSATION
B110	Case Administration	10.4	\$6,885.00
B120	Asset Analysis and Recovery	68.3	\$52,066.50
B130	Asset Disposition	125.80	\$86,272.00
B140	Relief-Stay/Adequate Protection	0.5	437.50
B150	Meetings and Communications with Creditors	0.4	\$344.00
B160	Fee Applications and Objections to Fee Applications	14.0	\$7,389.00
B185	Assumption / Rejection of Leases	25.5	\$15,790.00
B190	Other Contested Matters and Omnibus Hearings	54.7	\$31,019.50
B200	Adversary Actions	2.2	\$1,067.00
B210	Business Operations	54.8	\$41,129.00
B220	Employee Benefits	19.9	\$14,604.00
B230	Financing / Cash Collateral	1.1	\$914.00
B235	Financial Filings	1.6	\$800.00
B310	Claims Administration and Objections	10.6	\$8,922.50
	TOTAL:	389.8	\$267,730.00
	Total Fees Requested		\$267,730.00

ITEMIZED EXPENSES

EXPENSE CATEGORY	TOTAL EXPENSES
E112 – Filing Fees	\$239.50
E116– Deposition Transcripts – Planet Depos. LLC	\$3,394.85
TOTAL:	\$3,634.35

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related to Document No.: 164
v.	Hearing Date:
NO RESPONDENT.	Hearing Time:
	Response Deadline:

**MONTHLY FEE STATEMENT OF RAINES FELDMAN LITTRELL LLP
FOR THE PERIOD FROM APRIL 1, 2025 THROUGH APRIL 30, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, rule 2016 of the Federal Rules of Bankruptcy Procedure, rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Western District of Pennsylvania, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [Doc. No. 164] (the “Interim Compensation Order”), Raines Feldman Littrell, LLP (“Raines”), counsel for Debtors, hereby files this monthly fee statement relating to compensation for professional services rendered to the Debtors and for reimbursement of actual and necessary expenses incurred in connection therewith for the period commencing

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

April 1, 2025 through April 30, 2025 (the “Fee Period”), and requests authorization, in accordance with the Interim Compensation Order, to be paid by the Debtors in the aggregate amount of \$214,184.00 representing 80% of the total amount of fees of \$267,730.00 and 100% of the expenses of \$3,634.35 incurred during the Fee Period. Copies of Raines’ itemized time records for professionals and paraprofessionals performing services for the Debtors during the Fee Period are attached hereto as **Exhibit A**.

Respectfully submitted,

Dated: May 12, 2025

RAINES FELDMAN LITRELL, LLP

By: /s/ Michael J. Roeschenthaler

Michael J. Roeschenthaler (PA ID No. 87647)

Mark A. Lindsay (PA ID No. 89487)

Daniel R. Schimizzi (PA ID No. 311869)

11 Stanwix Street, Suite 1100

Pittsburgh, PA 15222

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mlindsay@raineslaw.com

dschimizzi@raineslaw.com

Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Itemized Time Records by Project Category



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

Invoice Date: 5/12/2025
Invoice Number: 134024

Corsa Coal, Corp. et al
Kevin M. Harrigan, President and CEO
1576 Storytown Road
PO Box 260
Friedens, PA 15541

8227-002 / Corsa Bankruptcy

Professional Services		Hours
04/01/2025 EBB	Further review of asset purchase agreement for closing requirements and documents.	2.00
04/01/2025 DXS	Review of and revisions to proposed orders on fee applications and submit the same for approval	0.30
04/01/2025 TAR	Continued research on employer obligations for terminating ERISA Health and Welfare Plans	0.60
04/01/2025 LL	Communications with D. Schimizzi relating to certified copies of sale orders (0.1); communications with clerk's office relating to same (0.1)	0.20
04/01/2025 MJR	Strategy call with client	0.30
04/01/2025 RWC	Review coal supply agreement (Stelco) (.5) analyze potential transfer and jurisdictional issues based on contract and other information (1.3) continued research regarding transfer versus stay and other strategies including new adversary (international application of section 362 stay, comity and factors related to comity) for enforcement of US order (5.3)	7.10
04/01/2025 JNK	Communications with SII regarding equipment (0.2); Review/analysis of SII equipment leases (0.7)	0.90
04/01/2025 JNK	Meeting with RFL team regarding sale closing items (0.5); Review/analysis of closing documents from KIA (0.6); Conference call with KIA regarding sale related issues (0.5); Review/analysis of closing documents from Rosebud (1.7)	3.30

04/01/2025	MBS	Prepare for and conference with MJR regarding strategy. Conference call with client regarding 401(k) plan termination.	2.20
04/01/2025	MJR	Discuss post-closing issues and winddown issues with T. Roeschenthaler	0.20
04/01/2025	MAL	Attention to various agreements, closing items, closing documents and other matters in preparation for planned closings	6.50
04/01/2025	TAR	Analysis of issues impacting benefits during transition (1.3); call with Raines team (0.3); call with client team (0.3)	1.90
04/01/2025	MJR	Call with E. Blum regarding post-closing issues	0.20
04/01/2025	MJR	Call with M. Schiff regarding employee benefits issues (0.1); call with client regarding same (0.2)	0.30
04/01/2025	LL	Prepare proposed order for fee statements of Raines and BDO	0.20
04/02/2025	JNK	Review and analysis of, and multiple set of revisions to Rosebud closing documents, KIA II closing documents, and LCT closing documents in aid of closing.	4.60
04/02/2025	TAR	Discussions with M. Roeschenthaler on client objectives for consultant team during transition period (0.2); research legal updates to ensure state and federal compliance and begin drafting of related agreement(s) (1.2).	1.40
04/02/2025	MJR	Discuss cash collateral issues with M. Lindsay (0.2); review KeyBank correspondence (0.1)	0.30
04/02/2025	MJS	Obtain tax transfer forms for PA and MD and tax ratios and exemptions for recordation and transfer	0.40
04/02/2025	MJR	Attention to DEP issues and correspond with DEP regarding same	0.20
04/02/2025	MJR	Communications with Key Bank regarding collateral (0.1); correspond with client and BDO regarding same (0.1)	0.20
04/02/2025	MAL	Review and revise various draft closing documents, attention to deed and lease issues, various discussions, conference calls, ets. and continuing preparation for planned closings	8.50
04/02/2025	JNK	Analysis of three SII equipment leases and amendments.	1.20
04/02/2025	MJR	Follow up with buyers and lender regarding sale and post-closing issues	0.40
04/02/2025	RWC	Continued research into modalities to move Stelco case to Bankruptcy court, including review of UNCITRAL	2.20
04/02/2025	JNK	Review/ analysis of EEOC portal and notification of transfer	0.50

04/02/2025	EBB	Multiple correspondence with counsel for KIA regarding closing items (.8); further review of various closing documents (1.3)	2.10
04/02/2025	JNK	Analysis of coal lease agreement and termination of same (0.6) ; Analysis of notice to lessors (0.4)	1.00
04/03/2025	MJS	Telephone call to Somerset Recorder of Deeds to verify deed recording fees and procedure	0.20
04/03/2025	DXS	Attention to review and analysis of and revisions to closing documents in connection with court-approved sales (2.2)	2.20
04/03/2025	RWC	Internal discussion regarding strategy and continued research regarding efforts to move Stelco claim to Bankruptcy court	0.80
04/03/2025	TAR	Complete Draft of Independent Contractor Agreement for winddown period	1.80
04/03/2025	HAR	Analyze issues regarding potential of Windy Hill assignment of contract (.5); Research regarding assumption of contracts (1.2); Prepare initial draft of motion and order regarding same (1.5)	3.20
04/03/2025	MJR	Review revised budget and correspond with BDO regarding same	0.20
04/03/2025	JNK	Discussions with SII and RFL regarding stipulation and agreement (0.5); draft stipulation (0.9)	1.40
04/03/2025	MJS	Telephone call to Maryland recorder of deeds to verify recording fees and procedure	0.20
04/03/2025	MJR	Revise Holcum PO	1.10
04/03/2025	MJS	Review deeds and settlement statements (.5); verify assessed values in deeds (.9)	1.40
04/03/2025	JNK	Review and analysis of, and multiple set of revisions to Rosebud closing documents, KIA II closing documents, and LCT closing documents in aid of closing.	6.40
04/03/2025	MAL	Negotiate closing agreements and documents, attention to multiple outstanding issues, telephone call and communications and prepare for sale closings.	10.20
04/03/2025	MJR	Attention to inventory sale issues and correspond with client and BDO regarding same	0.30
04/04/2025	MJS	Assist in closing review deeds, closing statements and transfer taxes for multiple real estate sale orders - verify assessed value - this involved searching over 100 parcels and recording the values in a prepared spreadsheet to verify transfer tax	6.40

04/04/2025 DXS	Continue review and analysis of and revisions to closing documents and conferences with M. Lindsay and J. Kelly regarding the same (2.8)	2.80
04/04/2025 MJR	Discuss discovery with RFL team	0.20
04/04/2025 MAL	Negotiate and finalize closing documents and complete closings for asset sales.	7.50
04/04/2025 HAR	Attention to issue regarding disposition of coal	0.60
04/04/2025 MJR	Status call with client and BDO	0.30
04/04/2025 MAL	Conferences with D. Schimizzi and H. Readshaw regarding motion to assume contract and review draft motion.	0.60
04/04/2025 JNK	Continued review and analysis of, and multiple set of revisions to Rosebud closing documents, KIA II closing documents, and LCT closing documents in aid of closing; work with client to close Rosebud, KIA II, and LCT sales.	5.20
04/04/2025 RWC	Review committee discovery and notice of deposition (.7) internal discussions regarding strategy (.3)	1.00
04/04/2025 DXS	Review of and revisions to stipulation involving Somerset centrifuge and correspondence with J. Kelly regarding the same (1.3)	1.10
04/04/2025 DXS	Review of agreements relating to executory contract (.8); review of and revisions to motion to assume and assign executory contract (.8); conferences with M. Lindsay, client, and H. Readshaw regarding the same (.6); correspondence with Debtors' professionals and chambers regarding additional omnibus dates (.3)	2.50
04/04/2025 MJR	Discussion with RFL team members regarding closing issues (0.4); attention to various closing issues (1.2)	1.60
04/07/2025 MAL	Review notice from Department of Labor and discussions with company regarding response	0.80
04/07/2025 JNK	Various communications with Rosebud and SII regarding equipment leases and property access (0.4); Revise stipulation and agreement (0.4)	0.80
04/07/2025 JNK	Attention to post-closing items relating to Rosebud sale transaction	1.20
04/07/2025 MAL	Review and consider resolutions for additional DEP issues and various communications regarding same	1.80
04/07/2025 TAR	Begin drafting fee application	1.00
04/07/2025 DXS	Review of and revisions to Somerset stipulation and correspondence with J. Kelly regarding the same	0.60

04/07/2025	JNK	Review of second amended contracts notices relating to pro-vigil contracts	0.20
04/07/2025	MJR	Communications with M. Lindsay regarding sale	0.20
04/07/2025	DXS	Correspondence with chambers and Debtors' professionals regarding upcoming omnibus hearing dates and coordinate filing of notice regarding the same	0.30
04/07/2025	JNK	Draft motion to extend time and related research regarding transfer of foreign proceedings	2.20
04/07/2025	MAL	Review and revise motion to assume coal supply agreement and discussions regarding same.	1.20
04/07/2025	RWC	Research (4.7), telephone conference with M. Isaacs (Canadian counsel) (.4) and internal strategy discussions (.6) regarding Stelco case	5.70
04/07/2025	JNK	Discussion regarding interim compensation procedures (0.2); Prepared proposed order regarding Stikeman fees (0.2)	0.40
04/07/2025	MJR	Correspondence regarding reclamation fee audit	0.10
04/07/2025	JNK	Attention to post-closing items relating to LCT sale transaction	0.60
04/07/2025	MAL	Attend to various post-closing issues, communications and telephone calls	5.80
04/07/2025	KJL	Review of Stipulation and Agreed Order Extending Use of Cash Collateral and Modifying Certain Terms of Final DIP Order and related forecast	0.40
04/07/2025	DXS	Review notice and proposed order for Canadian Counsel fee statement and correspondence with J. Kelly regarding the same	0.30
04/07/2025	JNK	Attention to post-closing items relating to KIA II sale transaction	0.60
04/07/2025	JNK	Analysis of Committee's 30(b)(6) deposition notice topics and document requests	0.40
04/08/2025	DXS	Correspondence with M. Lindsay and H. Readshaw regarding expediting motion to assume executory contract (.3); review and revise expedited motion (.2); correspondence with chambers regarding scheduling of expedited hearing (.1)	0.60
04/08/2025	MAL	Review and consider agreement for post-close employee lease agreement and various discussions regarding same	1.80
04/08/2025	JNK	Draft Notice of Closing of Sales and related exhibits	0.80
04/08/2025	JNK	Draft amendment to second amended contracts list and prepare schedule	0.70

04/08/2025	JNK	Review/analysis of closing binder relating to KIA II sale transaction.	0.50
04/08/2025	JNK	Draft omnibus motion to reject executory contracts and leases	1.60
04/08/2025	RWC	Prepare and participate in client conference call regarding Committee Discovery	0.50
04/08/2025	JNK	Prepare notice regarding omnibus hearings	0.30
04/08/2025	DXS	Correspondence with chamber regarding additional omnibus hearing dates and correspondence with Raines' team regarding notice of the same	0.20
04/08/2025	HAR	Revise motion regarding Holcim contract to incorporate expedited hearing (.9); Prepare drafts of proposed notice and scheduling order (.4)	1.10
04/08/2025	MAL	Continuing communications and attention to various post-close issues and obligations	2.30
04/08/2025	JNK	Review/revise amended schedule for debtor corsa coal corp. and cover sheet	0.50
04/08/2025	MBS	Email to/from MJR regarding Corsa Coal benefits issues for Wilson	0.20
04/08/2025	JNK	Client call to discuss deposition notice and document requests.	0.40
04/08/2025	MAL	Review asset schedules and address lease issues and obligations	1.20
04/08/2025	TAR	Review and analyze issues raised by client in relation to employees during transition period with Wexford; correspond with M. Roeschenthaler regarding same	1.90
04/08/2025	JNK	Analysis of pro-vigil accounts and contracts (0.5); Communications with client regarding same (0.3)	0.80
04/09/2025	MAL	Various discussions and calls with client and BDO team regarding status and strategy	0.80
04/09/2025	MJR	Confer with RFL team members regarding open issues and post-closing issues and attention to DEP issues	0.80
04/09/2025	JNK	Preparation of Second Omnibus Rejection Motion and corresponding contract rejection list.	1.20
04/09/2025	JNK	Conference call with Stikeman regarding Canadian action.	0.60
04/09/2025	MAL	Review and revise proposed post-close employee lease agreement and various discussions regarding same	1.30
04/09/2025	MAL	Address and review various DEP issues and inquiries and discussions regarding potential global resolution	2.60

04/09/2025 JNK	Prepare schedule of rejected contracts.	3.70
04/09/2025 MJR	Calls and correspondence regarding environmental issues and related follow up with the client, BDO and RFL team members	1.60
04/09/2025 JNK	Analysis of leases relating to rejection motion.	1.20
04/09/2025 MAL	Research regarding Stelco action strategy options and discussions with R. Crouch regarding same	1.70
04/09/2025 KJL	Attention to Motion for Order Authorizing Assumption and Assignment of Holcim Contract (.3); Meetings with K. Harrigan and E. Blum regarding status of sale agreements and post-closing strategy (.6)	0.90
04/09/2025 MJR	Correspond with D. Waxman regarding bond issues	0.10
04/09/2025 MJR	Additional correspondence with client and BDO regarding DEP, wind down issues and UST inquiry	0.30
04/09/2025 JNK	Communications with Omni regarding service.	0.20
04/09/2025 MAL	Meeting and analysis regarding omnibus rejection of contracts and leases	1.20
04/09/2025 MAL	Review Stelco civil action status and telephone conference with P. Yang regarding options in recognition proceeding.	0.50
04/09/2025 MAL	Communications and attention to various vendor agreements, service issues and terminations	1.60
04/09/2025 SEW	Phone call with J. Kelly regarding list of executory contracts and unexpired leases and potential discrepancies and review and analyze documents related to same	0.70
04/10/2025 JNK	Communications with Stikeman regarding order on Jan. & Feb. fee statements and March fee statement	0.20
04/10/2025 MJR	Call with client regarding open issues	0.20
04/10/2025 MAL	Review and revise draft employee lease agreement and discussions regarding same	1.00
04/10/2025 DXS	Conference with Debtors' professionals regarding executory contracts and unexpired leases assumed in connection with approved sales (.5); review and analysis of contracts and leases not assumed and attention to resolution of issues arising from the same (.8)	1.30
04/10/2025 MJR	Call with client and BDO regarding environmental claims and strategy	0.30

04/10/2025 MAL	Draft and revise mutual lease termination agreement and discussions regarding same.	1.00
04/10/2025 JNK	Discuss contract rejection list with M. Lindsay and D. Schimizzi (0.3); Conference call with BDO regarding contract rejection list (0.3)	0.60
04/10/2025 JNK	Research relating to effects of sale in connection with post-closing issues	2.10
04/10/2025 JNK	Review/analysis of client comments on document requests (0.4); Conference call with client and R. Crouch regarding Committee discovery requests (0.5); Communications with Committee counsel regarding meet and confer (0.2)	1.10
04/10/2025 RWC	Prepare and participate in telephone conference with client regarding committee discovery (.5) work on assembly and review of prior produced documents (.9) review 30(b)(6) rules (.2)	1.60
04/10/2025 MJR	Correspond with creditor regarding potential claims	0.20
04/10/2025 MAL	Meetings regarding and review and revisions regarding lease and contract rejections.	1.40
04/10/2025 DXS	Review order approving KEIP and correspondence with Debtors' professionals regarding payment dates	0.30
04/10/2025 JNK	Revise interim fee application into combined interim application and March fee statement	1.40
04/10/2025 MAL	Review various deed and property issues and post-closing items regarding property transfers and assignments	2.30
04/10/2025 JNK	Review edits/comments to rejection motion and revise second omnibus rejection motion accordingly.	0.60
04/10/2025 MAL	Telephone call with BDO regarding DEP claims and wind down obligations and review of same	1.20
04/11/2025 RWC	Prepare and revise summary of Stelco claim	0.40
04/11/2025 JNK	Finalize RFL first interim fee application and RFL March fee statement and related notices	1.60
04/11/2025 MAL	Analyze and finalize employee agreement and various communications regarding same	1.80
04/11/2025 MBS	Receipt and analysis email from Betsy and Wilson Creek Plan documents including ERISA Plan, Summary Plan description, Section 125 Plan and summary plan description.	4.20
04/11/2025 MAL	Research and analysis regarding deed restrictions and bankruptcy sale issues and various strategy discussions regarding same	2.40

04/11/2025	MAL	Analyze and revise motion to assume and finalize agreement with regard to supply agreement	0.90
04/11/2025	JNK	Conference call with BDO and client regarding contracts list.	0.50
04/11/2025	JNK	Draft Stikeman March fee statement and prepare exhibits and related notices.	0.80
04/11/2025	JNK	Analysis of 3d Cir authority with respect to post-closing issues.	1.30
04/11/2025	MAL	Review certain deed changes and confirm corrections for recording	0.50
04/11/2025	MJR	Discuss Stelco with R. Crouch	0.20
04/12/2025	MBS	Email client regarding analysis of benefits issues	0.20
04/13/2025	DXS	Review and analysis of fee calculation for inclusion in fee statement and correspondence with Debtors' professionals regarding the same	0.60
04/14/2025	JNK	Additional revisions to March fee statement.	0.30
04/14/2025	JNK	Revise rejected contracts list (0.8); Prepare exhibits and coordinate filing of two omnibus rejection motions (0.5)	1.30
04/14/2025	DXS	Review equity holders schedule for Corsa Coal Corp and correspondence approving filing of the same	0.30
04/14/2025	MAL	Telephone conference with surety and counsel regarding bonding issues and review bond and claim information	1.50
04/14/2025	MAL	Review contract and lease list for rejection and discussions with client regarding same	0.70
04/14/2025	JNK	Analysis of caselaw relating to pre-petition litigation.	2.80
04/14/2025	MAL	Attention to various post-close issues and necessary action items	1.00
04/14/2025	MAL	Review and revise sale closing notice and conference with J. Kelly regarding status	0.60
04/14/2025	JNK	Conference call with Committee regarding document requests.	0.50
04/14/2025	MAL	Conference with D. Schimizzi regarding equity holders list and review of same	0.60
04/14/2025	LL	File Raines Feldman Littrell March Fee Statement and Notice of Hearing	0.10
04/14/2025	JNK	Communications with BDO regarding March fee statements.	0.20

04/14/2025 JNK	Discussion with D. Schimizzi and M. Lindsay regarding notice of closing and finalize exhibits for related to same.	0.70
04/14/2025 LL	Prepare Equity Security List in Best Case (0.1); file same with the court (0.1)	0.20
04/14/2025 RWC	Prepare and participate in meet and confer with Committee counsel regarding Committee Discovery (.7) email exchange with client and work on emails to IT (.4) vendor for appropriate search (.4) follow-up with client regarding email to IT vendor (.2) review litigation hold letter regarding estate claim for mine worker death (Joshua Mock) and make inquiries regarding investigations and status (.7)	2.40
04/14/2025 DXS	Review of and revisions to notice of closing on sale transactions (.4); review of notices of contract and lease assumption and correspondence with Debtor and Debtors' professionals regarding modifications to the same for filing (.8)	1.20
04/14/2025 JNK	Telephone call with client regarding Committee document requests (0.2); Exchange communications with Committee counsel regarding deposition (0.2)	0.40
04/14/2025 MAL	Communications with DEP and client regarding JOB 12 and other issues	1.00
04/14/2025 DXS	Further review of and revisions to fee statement and related exhibits and correspondence with J. Kelly regarding the same	0.50
04/14/2025 JNK	Draft motion to expedite hearing on contract rejection motions.	0.90
04/14/2025 JNK	Coordinate filing of equity shareholder list.	0.30
04/14/2025 MJR	Correspond with counsel for Stelco	0.20
04/14/2025 JNK	Communications with Stikeman regarding March fee statement.	0.20
04/15/2025 MAL	Review and revise motion to rejection contracts and leases and discussions regarding same.	1.10
04/15/2025 MAL	Research regarding and review and revise motion regarding right of first refusal	2.40
04/15/2025 MAL	Telephone call with DEP regarding claims issues and review draft consent agreement	1.00
04/15/2025 MAL	Review proposed corrective deed and various parcel details for post-close issues	0.80
04/15/2025 MJR	Discussion with M. Lindsay regarding Stelco and DEP	0.20
04/15/2025 MAL	Internal conference regarding Committee discovery requests, review of same and discuss response issues	1.70

04/15/2025	RWC	Review documents for production to Committee	3.10
04/15/2025	MAL	Discussions with counsel regarding lease termination and attention to other post-close issues	1.00
04/15/2025	JNK	Review/analysis of potentially responsive documents (appx 1850 pages) to Committee document requests for production.	2.40
04/15/2025	JNK	Draft motion to affirm KIA Sale free and clear.	2.40
04/16/2025	MAL	Review and analyze amended Commonwealth global trust agreement and various communications regarding same	2.30
04/16/2025	JNK	Continued research and analysis of caselaw relating to pre-petition litigation.	2.60
04/16/2025	KJL	Confer with R. Crouch regarding Acosta mine accident and litigation hold with regard to same	0.40
04/16/2025	MJR	Call with client regarding environmental claim issues	0.20
04/16/2025	MJR	Correspond with counsel for Stelco regarding potential action in US	0.10
04/16/2025	MAL	Analyze various lease agreements, consider rejection and other issues and various discussions regarding same	1.90
04/16/2025	MAL	Attention to various post-closing and wind down operations issues	1.70
04/16/2025	RWC	Further investigation into documents and preservation regarding litigation hold letter from Mock's counsel (.4)	0.40
04/16/2025	MAL	Research and draft lease termination agreement	1.20
04/17/2025	JNK	Communications with Omni relating to counterparties listed on omnibus rejection motions.	0.20
04/17/2025	JNK	Multiple rounds of revisions to Debtors' responses to committee document requests (1.2); Multiple rounds of revisions to clawback agreement (0.8)	2.00
04/17/2025	MJR	Respond to buyer inquiry and follow up regarding same	0.20
04/17/2025	JNK	Prepare first set of documents for production to committee (0.6); Multiples communications with Committee counsel regarding document production, formal responses to discovery, and clawback agreement (0.3)	0.90
04/17/2025	MBS	Research regarding plan termination	1.50
04/17/2025	MAL	Review and analyze proposed DEP agreement and related issues, various discussions regarding same	2.10

04/17/2025	MAL	Draft and revise proposed lease termination agreement and various discussions regarding same	1.60
04/17/2025	RWC	Draft and revise responses and objections to Committee Discovery (3.2) Draft and revise clawback agreement (1.9) internal discussions regarding comments on both discovery documents and finalize (.4) entry of appearance (.1)	5.60
04/17/2025	MAL	Review and analyze Stelco breach of contract action and research regarding same	3.50
04/17/2025	MJR	Review creditor inquiry and follow up regarding same	0.20
04/17/2025	JNK	Research and analysis of caselaw related enforceability of certain contract provisions in bankruptcy cases.	1.40
04/18/2025	JNK	Review/analysis of communications for privilege and responsiveness relating to Committee's document requests	3.20
04/18/2025	JNK	Prepare preliminary agenda for omnibus hearing.	0.70
04/18/2025	RWC	Review Minutes of Board Meetings for production to Committee (.7) review and study financial documents for production (Accounts payable, monthly and quarterly statements) (2.6)	3.30
04/18/2025	MJR	Follow up regarding wind down issues and creditor inquiries	2.10
04/18/2025	JNK	Review of prior invoices and fee statements to revise fee application.	1.10
04/18/2025	MAL	Attention to and various communications and review regarding post-close operational issues, DEP claims and property closing action items.	5.20
04/18/2025	JNK	Review and revise BDO fee statement and related notices (0.3); Exchange communications with BDO relating to revisions on fee statements (0.2)	0.50
04/18/2025	MJR	Status call with client and BDO	0.30
04/18/2025	MAL	Review pleadings and documents for preparation of hearings binders	0.70
04/21/2025	LL	Format and file Monthly Operating Reports for all debtor entities	1.20
04/21/2025	JNK	Communications with Committee Counsel regarding clawback agreement (0.2); Continued review/analysis communications for privilege and responsive to document requests (2.8)	3.00
04/21/2025	JNK	Review/analysis of monthly operating reports and prepare for filing.	0.70
04/21/2025	MJR	Review of proposed DEP settlement and related review of property issues and follow up	0.70

04/21/2025	MAL	Review and finalize corrective deed for recording and various communications regarding same	0.80
04/21/2025	JNK	Attention to preparing and executing corrective deed.	0.60
04/21/2025	RWC	Review email for production and proposed redactions and internal discussion regarding finalization of clawback agreement	3.80
04/21/2025	JNK	Revise fee application relating to task specific work.	1.20
04/21/2025	MAL	Review and discuss fee application details for approval	0.60
04/21/2025	MAL	Review environmental obligation details and various telephone calls with BDO and surety regarding DEP issues and potential resolutions	2.60
04/21/2025	MJR	Discussions with M. Lindsay regarding environmental and review related materials (0.6); call with counsel for INIC (0.4)	1.00
04/22/2025	MAL	Research and attention to potential adversary proceeding	1.40
04/22/2025	RWC	Continued review of documents for production to Committee and to prepare for deposition	2.60
04/22/2025	MAL	Telephone call with DEP, begin review and revisions to draft stipulation and consent order and various discussions regarding same.	2.70
04/22/2025	MAL	Telephone conference with KeyBank counsel regarding status and wind down issues	0.40
04/22/2025	JNK	Continued review/analysis communications for privilege and responsive to document requests (2.6); Discussions with R. Crouch and M. Roeschenthaler regarding outstanding documents for production (0.3)	2.90
04/22/2025	MAL	Attention to and various discussions and communications regarding informal objections and necessary revisions to orders of court.	2.20
04/22/2025	MJR	Call with DEP regarding open matters	0.60
04/22/2025	MJR	Call with counsel for KeyBank regarding status	0.20
04/22/2025	JNK	Prepare final agenda for omnibus hearing.	0.40
04/22/2025	SEW	Confer with J. Kelly regarding monthly fee statements	0.30
04/23/2025	MJR	Discuss inquiry by buyer with M. Lindsay	0.20
04/23/2025	MJR	Discuss DEP stipulated order with M. Lindsay (0.1); respond to committee inquiry (0.1)	0.20

04/23/2025	JNK	Prepare certificates of no objection related Holcim Assumption Motion and Second Omnibus Rejection motion (0.5); Revise order for First Omnibus Rejection motion from communications with M. Lindsay and creditor's counsel (0.2); Prepare certificate of counsel relating First Omnibus Rejection Motion (0.5)	1.20
04/23/2025	MBS	Email from Kevin regarding term of benefit plans	0.30
04/23/2025	JNK	Review/revise Stipulation and Consent Order with DEP and Committee and prepare for filing.	0.60
04/23/2025	JNK	Prepare amended final agenda for omnibus hearing.	0.50
04/23/2025	MAL	Attention to and meetings regarding various post-close wind down issues and action items	1.80
04/23/2025	MJR	Review and revise DEP stip	0.20
04/23/2025	JNK	Prepare for omnibus hearings.	0.70
04/23/2025	JNK	Draft payment demand letter.	0.80
04/23/2025	MAL	Continuing review and revision of stipulation and consent order, communications with interested parties and telephone conference with DEP regarding same	1.80
04/23/2025	MAL	Analyze and revise order regarding contract rejections, review certifications and various discussions with parties regarding same	1.50
04/23/2025	JNK	Revise 9019 motion relating to DEP settlement.	0.70
04/24/2025	MBS	Review summary plan descriptions and communications relating to Benefit Plans termination	1.80
04/24/2025	MAL	Attention to various wind down operational issues and post closing items and communications regarding same	2.80
04/24/2025	JNK	Attention to matters scheduled for hearing including discussions with RFL team, review of court orders entered on pending matters and coordinating cancellation of omnibus hearing.	0.80
04/24/2025	MJR	Discuss open issues with M. Lindsay	0.20
04/24/2025	DXS	Review draft discovery production and correspondence with R. Crouch and J. Kelly regarding the same	0.60
04/24/2025	TAR	Correspond with M. Lindsay on issues related to property subdivision: Review KIA II and Cambrian Lease Agreements for purpose of researching issues related to subdivision of property	1.80
04/24/2025	JNK	Review/analysis of board director meeting minutes for document production.	0.50

04/24/2025	RWC	Review of Board Minutes for production and internal discussions necessary to determine application of privilege/attorney-work product (1.4) prepare notes for witness deposition preparation (1.0)	2.40
04/24/2025	KJL	Research regarding Debtors negotiations with PA DEP regarding proposed resolution of DEP's Motion Regarding Automatic Stay	0.50
04/25/2025	MAL	Review mineral lease and telephone conference with counsel regarding lease termination	0.70
04/25/2025	JNK	Draft Interim Fee Application for Stikeman Elliot	2.20
04/25/2025	MAL	Analyze, review and revise motion regarding sale free and clear of right of first refusal and various discussions and review of documents regarding same.	2.30
04/25/2025	MAL	Review and analyze employee benefit issues and status and telephone conference with M. Schiff regarding same.	1.20
04/25/2025	TAR	Research related to issues impacting post-closing actions	2.90
04/25/2025	MAL	Additional research and analysis regarding potential adversary proceeding for breach of contract	0.80
04/25/2025	MBS	Correspond with Kevin Harrigan and Mark Lindsay regarding strategy meeting and benefit plans and related follow up	0.50
04/25/2025	MJR	Discuss status with M. Lindsay	0.20
04/28/2025	MAL	Initial review of amended DEP proposal and various property and permit details	1.40
04/28/2025	JNK	Review/analysis of final invoices related to Pro-Vigil accounts.	1.10
04/28/2025	MAL	Attention to various wind down issues and vendor discussions	2.30
04/28/2025	TAR	Finalize research on post-closing issues	1.80
04/28/2025	MBS	Prepare for and conference with Mark Lindsay and Michael Roeschenthaler regarding strategy (0.8); participate in call with client (0.3); draft and revise outline of steps for termination of plans (.7)	2.20
04/28/2025	MAL	Telephone conference with M. Roeschenthaler and review of pleadings regarding Stelco action	1.00
04/28/2025	JNK	Research relating to insurance financing agreement.	0.90
04/28/2025	JNK	Prepare of certificate relating to March fee statement.	0.20
04/28/2025	MAL	Various communications regarding post-close issues and necessary action items	1.20

04/28/2025	MAL	Review employee benefit issues and various telephone conferences regarding plan terminations	1.40
04/28/2025	MJR	Discussion with RFL team members regarding benefit wind down and related issues (0.3); attend call with client regarding same (0.2)	0.50
04/29/2025	MAL	Attention to and discussions regarding DEP issues and review and revise proposed agreements	2.80
04/29/2025	MAL	Discussions and attention to various vendor and post-closing operations issues	1.40
04/29/2025	JNK	Communications with client regarding insurance agreements.	0.20
04/29/2025	JNK	Draft termination of lease letter.	0.70
04/29/2025	JNK	Review insurance premium financing agreement and discuss same with M. Lindsay	0.80
04/29/2025	MAL	Review pleadings and conferences regarding proceeding with Stelco cause of action	1.50
04/29/2025	JNK	Review/analysis of Canadian lawsuit pleadings for preparation of adversary proceeding.	2.20
04/29/2025	MAL	Various follow up items and attention to employee benefit issues	1.00
04/29/2025	RWC	Prepare for deposition (2.2) follow-up regarding litigation hold letter (.2)	2.40
04/30/2025	MJR	Meeting with K. Harrigan relating to deposition	1.00
04/30/2025	MAL	Discussions with client and review of township ordinance regarding road maintenance and potential bonds	0.60
04/30/2025	RWC	Prepare and conduct witness preparation for Committee 30(B)(6) deposition (3.3) internal discussion and client discussion regarding Stelco adversary complaint (.3) work on draft of adversary complaint (.7) work on draft email correspondence regarding litigation hold letter (.3)	4.60
04/30/2025	JNK	Preparation with client for 30(b)(6) deposition.	3.00
04/30/2025	MAL	Meetings with K. Harrigan regarding various wind down issues and preparation for committee deposition	2.10
04/30/2025	MAL	Review recorded corrective deed and lease termination and communications to buyer party regarding same	0.40
04/30/2025	MAL	Review recorded deeds, review and revise motion regarding right of first refusal for filing and various conferences with J. Kelly regarding same.	2.20

04/30/2025 MAL	Multiple discussions with vendor and client regarding potential stay violations	1.10
04/30/2025 DXS	Correspondence with J. Kelly and M. Lindsay regarding motion to expedite hearing on affirming sale	0.20
04/30/2025 MAL	Review correspondence from surety and review of site details regarding status of various reclamation bonds	0.60
04/30/2025 MAL	Communications with creditor regarding extension of equipment leasing	0.50
04/30/2025 JNK	Review/revise motion affirming KIA Sale and expedited hearing.	1.20
Sub-total Fees:		\$267,730.00

Rate Summary

Tina A. Roeschenthaler	15.10 hours at \$670.00/hr	\$10,117.00
Jordan N. Kelly	105.70 hours at \$485.00/hr	\$51,264.50
Daniel R. Schimizzi	15.90 hours at \$615.00/hr	\$9,778.50
Kenneth J. Lund	2.20 hours at \$875.00/hr	\$1,925.00
Michael J. Roeschenthaler	18.30 hours at \$860.00/hr	\$15,738.00
Mark A. Lindsay	149.10 hours at \$780.00/hr	\$116,298.00
Lela Lescalette	1.90 hours at \$375.00/hr	\$712.50
Harry A. Readshaw	4.90 hours at \$665.00/hr	\$3,258.50
Michael J. Sally	8.60 hours at \$465.00/hr	\$3,999.00
Ronald W. Crouch	49.90 hours at \$825.00/hr	\$41,167.50
Matthew B. Schiff	13.10 hours at \$720.00/hr	\$9,432.00
Sarah Wenrich	1.00 hours at \$575.00/hr	\$575.00
Eric B. Blum	4.10 hours at \$845.00/hr	\$3,464.50
Total hours:	389.80	\$267,730.00

Expenses

	Amount
04/01/2025 Planet Depos, LLC: TRANSCRIPT WITH INDEX OF: Debtor Asset Auction, Exhibits, Planet Summary; Inv. #738707	2,170.25
04/01/2025 US Bankruptcy Court for the Western District of Pennsylvania: 04/01/2025 - Certified Copies of Three Sale Orders	239.50
04/07/2025 Planet Depos, LLC: TRANSCRIPT WITH INDEX OF: Debtor Asset Auction-Day 2, Exhibits, Planet Summary; Inv. #741767	1,224.60
Sub-total Expenses:	\$3,634.35

Raines Feldman Littrell LLP
May 1, 2025 through May 31, 2025 Invoice



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

Invoice Date: 6/3/2025
Invoice Number: 134682

Corsa Coal, Corp. et al
Kevin M. Harrigan, President and CEO
1576 Storystown Road
PO Box 260
Friedens, PA 15541

8227-002 / Corsa Bankruptcy

Professional Services				Hours	Rate	Amount
05/01/2025	MJR	B110	Status call with BDO	0.30	860.00	258.00
05/02/2025	MJR	B110	Calls and communications relating to winddown, including with client, BDO and various case parties and follow up with RFL team regarding same	2.20	860.00	1,892.00
05/07/2025	MJR	B110	Meeting with M. Lindsay regarding wind down issues	0.30	860.00	258.00
05/08/2025	TAR	B110	Assist with winddown matters	1.90	670.00	1,273.00
05/09/2025	MJR	B110	Meetings and discussions with RFL team and BDO regarding environmental issues and remaining open items (1.3); call with DEP regarding same (0.4); review authority relating to obligations argument and attention to same (1.1)	2.80	860.00	2,408.00
05/09/2025	TAR	B110	Assist with winddown matters	0.90	670.00	603.00
05/12/2025	MJR	B110	Follow up regarding DEP issues and options, including analysis of dismissal issues, correspondence with D. Schimizzi regarding motion, correspondence with M. Lindsay regarding settlement motion, and client communications	2.50	860.00	2,150.00
05/15/2025	MJR	B110	Correspond with D. Schimizzi regarding case winddown	0.20	860.00	172.00
05/19/2025	MJR	B110	Respond to inquiry from KeyBank (0.1); follow up with D. Schimizzi and M. Lindsay regarding winddown (0.1)	0.20	860.00	172.00
05/19/2025	MJR	B110	Call with M. Lindsay and D. Schimizzi regarding wind down	0.30	860.00	258.00
05/19/2025	MJR	B110	Review updated wind down budget and related follow up	0.60	860.00	516.00
05/19/2025	MJR	B110	Respond to inquiries relating to wind down, DEP settlement and remnant assets and follow up with client regarding same	0.50	860.00	430.00

05/19/2025	MJR	B110	Respond to inquiries relating to winddown and follow up regarding same with client and BDO	0.60	860.00	516.00
05/19/2025	MJR	B110	Additional analysis of wind down issues	0.40	860.00	344.00
05/19/2025	MJR	B110	Correspond with client regarding assets and wind down issues and analysis of options relating to same	0.70	860.00	602.00
05/20/2025	MJR	B110	Meeting with RFL team regarding wind down and call with BDO regarding same	0.90	860.00	774.00
05/20/2025	MJR	B110	Correspond with client regarding wind down issues	0.20	860.00	172.00
05/20/2025	MJR	B110	Correspond with client regarding hearing and winddown issues in addition to communications with BDO, Canadian counsel, DEP and case parties and follow up regarding same	3.10	860.00	2,666.00
05/21/2025	MJR	B110	Correspond with client regarding various open matters	0.20	860.00	172.00
05/21/2025	MJR	B110	Calls with E. Blum regarding winddown and follow up call with KeyBank counsel	0.80	860.00	688.00
05/23/2025	MJR	B110	Correspond with BDO regarding status and winddown issues	0.20	860.00	172.00
05/23/2025	MJR	B110	Analysis of various post-dismissal issues and means to address the same and other administrative matters	1.70	860.00	1,462.00
05/26/2025	MJR	B110	Attention to wind down issues and correspond with RFL and BDO regarding same	0.90	860.00	774.00
05/27/2025	MJR	B110	Call with D. Waxman regarding wind down and settlement motion	0.20	860.00	172.00
05/27/2025	MJR	B110	Calls and correspondence with BDO, RFL and case parties regarding wind down, budget and related matters	1.30	860.00	1,118.00
05/27/2025	MJR	B110	Attention to dismissal motion and correspond with J. Nelms regarding authority	0.90	860.00	774.00
05/27/2025	MJR	B110	Correspond with counsel for committee regarding case disposition and cash collateral	0.20	860.00	172.00
05/28/2025	JDN	B110	Researching authorities on filing a motion to dismiss bankruptcy case and related analysis	7.30	425.00	3,102.50
05/28/2025	MJR	B110	Review and revise motion to dismiss and correspond with RFL and KeyBank regarding same	3.70	860.00	3,182.00
05/28/2025	MJR	B110	Status call with client	0.10	860.00	86.00
Sub-total: B110 Case Administration						27,338.50

05/01/2025	JNK	B120	Attend Debtors' 30(b)(6) deposition.	5.50	485.00	2,667.50
05/01/2025	MAL	B120	Review documents and conference regarding committee deposition.	1.00	780.00	780.00
05/01/2025	RWC	B120	Prepare and attend 30(B)(6) deposition	5.40	825.00	4,455.00
05/02/2025	RWC	B120	Prepare notes from 30(b)(6) deposition and review documents to assure full production	1.30	825.00	1,072.50
05/05/2025	MJR	B120	Communications with RFL team members regarding real property assets and Stelco action and follow up regarding options concerning same	1.70	860.00	1,462.00

05/05/2025	RWC	B120	Research procedural and substantive law for adversary complaint v Stelco and begin draft	4.70	825.00	3,877.50
05/06/2025	RWC	B120	Continued work related to Stelco adversary proceeding	3.20	825.00	2,640.00
05/07/2025	RWC	B120	internal discussion regarding Stelco (.3); email and telephone conversation with Canadian counsel (.3)	0.60	825.00	495.00
05/12/2025	MJR	B120	Correspond with D. Schimizzi regarding motion to dismiss	0.10	860.00	86.00
05/13/2025	MJS	B120	Review recording information and obtain deeds	1.10	465.00	511.50
05/19/2025	DXS	B120	Conference with M. Roeschenthaler and M. Lindsay regarding Committee investigation and potential claim (.6); prepare for and attend professionals conference call regarding potential claims (.4)	1.00	615.00	615.00
05/19/2025	MAL	B120	Telephone conference with committee counsel, follow up meeting with M. Roeschenthaler and review of insurance policy information	1.40	780.00	1,092.00
05/27/2025	RWC	B120	Internal discussions (.2) and telephone conference with Canadian counsel (.1) regarding potential assignment of Stelco claim	0.30	825.00	247.50
05/27/2025	RWC	B120	Review Harrigan Deposition Transcript (30B6) and exhibits (1.9) email to K. Harrigan (.1)	2.00	825.00	1,650.00
05/28/2025	RWC	B120	Review and respond to correspondence from counsel relating to the mining death with review to file and reference to collected documents and information	0.80	825.00	660.00
Sub-total: B120 Asset Analysis and Recovery						22,311.50
05/01/2025	MAL	B130	Various communications and attention to post-closing asset issues and review potential property disposition issues.	2.10	780.00	1,638.00
05/02/2025	MAL	B130	Review and analyze property descriptions and issues regarding potential disposition	2.30	780.00	1,794.00
05/05/2025	JNK	B130	Draft limited power of attorney related to permit transfer.	0.70	485.00	339.50
05/07/2025	JNK	B130	Review/revise 9010 motion.	0.90	485.00	436.50
05/07/2025	MJR	B130	Attention to wind down issues, potential abandonment options and other matters relating to remaining burdensome assets	1.50	860.00	1,290.00
05/08/2025	JNK	B130	Review/analysis of trust agreements.	2.60	485.00	1,261.00
05/08/2025	MAL	B130	Telephone conferences with potential interested parties in certain remaining assets and various follow up regarding same.	1.20	780.00	936.00
05/08/2025	MJR	B130	Follow up regarding trust asset inquiry including correspondence to trustee and discussion with J. Kelly	0.70	860.00	602.00
05/09/2025	JNK	B130	Continued analysis of trust agreements and potential disposition of same.	2.30	485.00	1,115.50
05/09/2025	MJR	B130	Attention and analysis relating to DEP issues and remaining real property assets	1.30	860.00	1,118.00

05/12/2025	JNK	B130	Revise exhibits for DEP stipulation.	1.30	485.00	630.50
05/12/2025	JNK	B130	Analysis of PA law relating to trusts (0.7); Discussion with MAL relating to trust agreements (0.3); Communications with Trustee regarding trust agreements (0.2)	1.20	485.00	582.00
05/19/2025	JNK	B130	Review/analysis of response in opposition to motion to affirm sale.	0.60	485.00	291.00
05/27/2025	JNK	B130	Draft limited powers of attorney relating to KIA II asset sale and Rosebud asset sale.	1.20	485.00	582.00
05/27/2025	MAL	B130	Review and revise draft powers of attorney for limited post-closing purposes	0.80	780.00	624.00
05/28/2025	MJR	B130	Correspond with Canadian counsel regarding Stelco	0.20	860.00	172.00
Sub-total: B130 Asset Disposition						13,412.00
05/28/2025	LL	B140	Prepare Certificate of No Objection to 9019 Motion (0.1); file same (0.1)	0.20	375.00	75.00
Sub-total: B140 Relief-Stay/Adequate Protection						75.00
05/06/2025	MJR	B150	Call with counsel for lender	0.20	860.00	172.00
05/07/2025	MJR	B150	Call from Ameriserv and discuss same with RFL team (0.3); call with counsel for KeyBank (0.1)	0.40	860.00	344.00
05/08/2025	MJR	B150	Discussions with case parties regarding exit options	0.60	860.00	516.00
05/13/2025	MJR	B150	Correspond with KeyBank counsel regarding status	0.10	860.00	86.00
05/14/2025	MJR	B150	Call with DEP and M. Lindsay (left call before conclusion)	0.30	860.00	258.00
05/16/2025	MJR	B150	Attention to committee inquiry regarding investigation and potential claim and follow up with RFL team members and client	1.40	860.00	1,204.00
05/20/2025	MJR	B150	Respond to inquiries of KeyBank	0.10	860.00	86.00
05/20/2025	MJR	B150	Discussion with M. Lindsay regarding DEP settlement and related issues (0.2); correspond with DEP regarding same (0.2)	0.40	860.00	344.00
Sub-total: B150 Meetings and Communications w/ Creditors						3,010.00
05/05/2025	TAR	B160	Review and revise fee statement COS drafted by L. Lescallette; correspondence with L. Lescallette regarding same	0.30	670.00	201.00
05/07/2025	JNK	B160	Prepare certificate of no objection relating to interim fee application.	0.20	485.00	97.00
05/08/2025	TAR	B160	Review and analyze time entries and billing for April fees and draft fee statement and related exhibits	2.00	670.00	1,340.00
05/09/2025	JNK	B160	Communications with Stikeman regarding April fee statement.	0.20	485.00	97.00
05/09/2025	JNK	B160	Review/analysis of fee summary and invoices from Stikeman.	0.50	485.00	242.50

05/12/2025	JNK	B160	Draft April fee statement and related notice for Stikeman Elliot (0.6); revise RFL fee statement (0.3).	0.90	485.00	436.50
05/12/2025	LL	B160	Format and file Raines April Fee Statement (0.1); format and file Stikeman April Fee Statement (0.1) and file and format Notice of Fee Statements (0.1)	0.30	375.00	112.50
05/12/2025	TAR	B160	Correspondence with administrative support on deposition expenses and requisite follow up	0.50	670.00	335.00
05/15/2025	DXS	B160	Review order on interim application and correspondence with Raines' team regarding the same (.3); correspondence with Raines' team regarding United States trustee request and connection with the applications and review information provided in response to the same (.8)	1.10	615.00	676.50
05/19/2025	JNK	B160	Review/revise BDO interim fee application and prepare exhibits for filing and related notice of hearing.	0.80	485.00	388.00
05/20/2025	JNK	B160	Review/revise BDO Interim Fee Application and exhibits (0.7); finalize Stikeman Interim Fee Application for filing (0.5)	1.20	485.00	582.00
05/21/2025	JNK	B160	Review/review BDO April Fee Statement, exhibits and notice.	0.70	485.00	339.50
05/23/2025	JNK	B160	Preparation of final fee application.	2.60	485.00	1,261.00
05/27/2025	JNK	B160	Review/revise certificates of no objection relating to Raines and Stikeman fee statements (0.2); Communications with Stikeman regarding CNO for April fee Stikeman (0.1)	0.20	485.00	97.00
05/27/2025	LL	B160	Review docket for objections to fee statements (0.1); draft CNO for Raines and Stikeman (0.2); file same with the court (0.1)	0.40	375.00	150.00
05/29/2025	JNK	B160	Continue preparation of final fee application.	2.80	485.00	1,358.00
05/30/2025	JNK	B160	Revise Stikeman interim fee application into final fee application and may fee statement.	2.50	485.00	1,212.50
05/30/2025	JNK	B160	Revise BDO monthly fee statement and finalize for filing with exhibits and notice.	0.50	485.00	242.50
Sub-total: B160			Fee Applications/Objections			9,168.50
05/23/2025	LL	B185	Review docket and update hearing deadlines	0.10	375.00	37.50
Sub-total: B185			Assumption/Rejection-leases & contracts			37.50
05/02/2025	MAL	B190	Attention to and communications regarding DEP bond payment and stipulation regarding same	1.20	780.00	936.00
05/06/2025	DXS	B190	Meeting with Raines Team regarding strategy and next steps in winding down chapter 11 cases (.5); research issues relating to winding down of Canadian entity (.8); attention to drafting of motion to dismiss (.9)	2.30	615.00	1,414.50

05/07/2025	DXS	B190	Review and analysis of all actions taken in chapter 11 cases and prepare summaries of the same for inclusion in motion (2.8); research and analysis of applicable authority relating to motion to dismiss (1.7); continue drafting motion to dismiss (.8)	5.30	615.00	3,259.50
05/09/2025	DXS	B190	Continue research and analysis of case law and related authority regarding motions to dismiss and relief requested in the same (1.9); continue drafting motion to dismiss (1.3)	3.20	615.00	1,968.00
05/12/2025	DXS	B190	Continue research and analysis of applicable authority regarding motions to dismiss (2.8); continue drafting and revising motion to dismiss (3.1); Conference with Debtors' professionals to discuss status of outstanding items and next steps in case administration (.7)	6.60	615.00	4,059.00
05/12/2025	JNK	B190	Draft summary of case discovery to date in aid of motion to dismiss.	0.70	485.00	339.50
05/12/2025	JNK	B190	Review and revise motion to dismiss.	2.20	485.00	1,067.00
05/13/2025	JNK	B190	Analysis of caselaw and revisions to motion to dismiss.	1.80	485.00	873.00
05/14/2025	JNK	B190	Continued analysis of caselaw and revisions to motion to dismiss.	2.80	485.00	1,358.00
05/15/2025	JNK	B190	Review/analysis of Debtors' 30(b)(6) deposition transcript and summary (0.5); Communications with RFL regarding same (0.2)	0.70	485.00	339.50
05/15/2025	JNK	B190	Discussion with RFL team regarding matters pending for hearing (0.2); Prepare preliminary agenda (0.5)	0.70	485.00	339.50
05/15/2025	LL	B190	File Preliminary Agenda	0.10	375.00	37.50
05/19/2025	DXS	B190	review revised form of motion to dismiss and attention to further revisions to the same (.9); correspondence with M. Roeschenthaler and J. Kelly regarding motion to dismiss (.4)	1.30	615.00	799.50
05/19/2025	JNK	B190	Continued analysis of relevant caselaw relating to motion to dismiss and revisions to same.	3.30	485.00	1,600.50
05/19/2025	JNK	B190	Prepare final agenda for omnibus hearing.	0.50	485.00	242.50
05/19/2025	MAL	B190	Review response to right of first refusal motion, various discussions and analysis regarding same	2.10	780.00	1,638.00
05/20/2025	DXS	B190	Correspondence with M. Lindsay and M. Roeschenthaler regarding expedited 9019 motion	0.30	615.00	184.50
05/20/2025	JNK	B190	Review/analysis of Response to Motion to Affirm Kia Sale and related caselaw (0.8); Multiple discussions and email communications with M. Lindsay and counsel for respondents and KIA relating to the Motion (0.7); Revise proposed order and prepare certification of counsel regarding same (0.6)	2.10	485.00	1,018.50
05/20/2025	MAL	B190	Various meetings and discussions and review of legal authority to prepare for hearings	1.80	780.00	1,404.00
05/20/2025	MAL	B190	Meetings and discussions to negotiate and revolve right of first refusal issue and review revised order and certification.	2.30	780.00	1,794.00

05/21/2025	DXS	B190	Correspondence with Raines' team regarding additional issues to address in connection with DEP matters (.4); attention to research and analysis of authority relating to abandonment (.9)	1.30	615.00	799.50
05/21/2025	JNK	B190	Preparation for Omnibus hearing and attend hearing.	2.00	485.00	970.00
05/21/2025	MJR	B190	Attend hearing on motion to enforce and status conference	0.40	860.00	344.00
05/22/2025	JNK	B190	Multiple discussions with RFL team regarding 9019 settlement motion (0.5); revise and preparation of motion, exhibits, and related notices for filing (2.5).	3.00	485.00	1,455.00
05/22/2025	TAR	B190	Discussion with M. Roeschenthaler on 1099 settlement and corresponding documentation	0.40	670.00	268.00
05/22/2025	TAR	B190	Review Expedited Motion in Support of 9019 Settlement and other related documents in preparation for drafting Harrigan Declaration in Support of Motion (0.7); begin drafting Declaration (0.8)	1.50	670.00	1,005.00
05/23/2025	DXS	B190	Strategy meeting with Debtors' professionals regarding next steps in case administration (.7); continue review of and revisions to draft motion (.9)	1.60	615.00	984.00
05/23/2025	JNK	B190	RFL meeting regarding case status and 9019 hearing.	0.30	485.00	145.50
05/23/2025	TAR	B190	Finalize draft of K. Harrigan Declaration in support of Settlement Motion	2.30	670.00	1,541.00
05/26/2025	JNK	B190	Revise declaration in support of settlement motion and prepare for filing.	0.80	485.00	388.00
05/27/2025	JNK	B190	Discussions with MJR regarding 9019 Motion hearing (0.2); prepare agenda for hearing (0.3)	0.50	485.00	242.50
05/28/2025	DXS	B190	Review of and further revisions to draft motion to dismiss and correspondence with M. Roeschenthaler regarding the same (.8); attention to preparation of proposed order for motion to dismiss (.6)	1.40	615.00	861.00
05/28/2025	DXS	B190	Review and revise correspondence regarding water trusts and confer with J. Kelly regarding the same	0.30	615.00	184.50
05/28/2025	JNK	B190	Prepare for hearing on 9019 motion.	1.50	485.00	727.50
05/28/2025	JNK	B190	review/analysis of FNB motion for relief from stay.	0.40	485.00	194.00
05/28/2025	MAL	B190	Various telephone calls and discussions and review of pleadings regarding wind down issues and preparation for hearings on pending motion.	2.40	780.00	1,872.00
05/29/2025	DXS	B190	Further revision to proposed order on motion to dismiss and circulate internally for review (.4); correspondence with J. Kelly regarding resolution of matters scheduled for omnibus hearing and next steps (.3)	0.70	615.00	430.50
05/29/2025	JNK	B190	Review Order granting 9019 Motion (0.1); Multiple communications with RFL team regarding order and canceling hearing (0.4); communications with Keybank and DEP relating to 9019 Motion order (0.1); review/revise notice of cancellation of hearing (0.2)	0.70	485.00	339.50
05/29/2025	LL	B190	Prepare Notice of Cancellation of Omnibus Hearing (0.1); file same (0.1)	0.10	375.00	37.50

05/30/2025	JNK	B190	Additional review/revision to edited version of motion to dismiss.	1.20	485.00	582.00
05/30/2025	KJL	B190	Attention to communications with financial analyst regarding settlement with PA DEP and analysis of Declaration in support of same	0.90	875.00	787.50
Sub-total: B190 Other Contested Matters/ Omnibus Hearing						38,831.00
05/06/2025	JNK	B200	Discussions with RWC and MAL regarding potential adversary proceeding.	0.40	485.00	194.00
05/19/2025	MJR	B200	Correspond with committee regarding investigation	0.10	860.00	86.00
05/19/2025	MJR	B200	Call with committee regarding potential claim and follow up with client	0.60	860.00	516.00
Sub-total: B200 Adversary Actions						796.00
05/02/2025	JNK	B210	Review/analysis of each debtor entities corporate documents.	2.70	485.00	1,309.50
05/02/2025	MAL	B210	Review updated financial data and telephone call with BDO regarding same and other wind down issues	0.80	780.00	624.00
05/05/2025	JNK	B210	Research/analysis of applicable PA, DE, and Canadian corporation acts.	3.50	485.00	1,697.50
05/05/2025	MAL	B210	Various communications and attention to wind down issues and operations	3.20	780.00	2,496.00
05/06/2025	JNK	B210	Research/analysis of applicable caselaw in PA, DE, and Canadian related to corporation acts.	1.40	485.00	679.00
05/06/2025	MAL	B210	Multiple communications and attention to various wind down and post-close issues	2.40	780.00	1,872.00
05/07/2025	MAL	B210	Attention to and various communications and follow up regarding post-close issues and wind down process	2.30	780.00	1,794.00
05/08/2025	MAL	B210	Attention to and various communications and correspondence regarding wind down services and pre-close issues	2.00	780.00	1,560.00
05/08/2025	MAL	B210	Review and revise consent order and telephone conferences with BDO regarding remaining properties and permits	1.70	780.00	1,326.00
05/08/2025	MAL	B210	Review original Clear Run and Trent/Acosta agreements and details regarding subject properties and permits	1.60	780.00	1,248.00
05/08/2025	MAL	B210	Telephone conference with Ameriserv regarding water related escrow and trust agreements, initially review documents and conference with J. Kelly regarding same	1.40	780.00	1,092.00
05/09/2025	MAL	B210	Various telephone calls and meetings with BDO, DEP and internal team regarding wind down, environmental issues and potential resolution	2.30	780.00	1,794.00
05/12/2025	MAL	B210	Various review and attention to inquiries regarding wind down status and process.	0.60	780.00	468.00
05/13/2025	JNK	B210	Telephone call with Trustee relating to trust agreements (0.5); RFL internal discussion relating to deed search (0.2).	0.70	485.00	339.50

05/13/2025	MAL	B210	Various discussions with vendors and client regarding post-closing services and issues	1.60	780.00	1,248.00
05/14/2025	MAL	B210	Telephone calls with vendors regarding wind down status.	0.80	780.00	624.00
05/15/2025	JNK	B210	Prepare summary of analysis of trust agreements.	1.40	485.00	679.00
05/16/2025	MAL	B210	Ongoing discussions and attention to wind down water treatment status and other DEP issues	2.30	780.00	1,794.00
05/16/2025	MAL	B210	Conferences and communications regarding utility service and potential emergency action for service restoration	1.50	780.00	1,170.00
05/19/2025	MAL	B210	Various emails and/or telephone calls with KeyBank counsel, BDO and client regarding wind down and budget issues.	1.80	780.00	1,404.00
05/20/2025	JNK	B210	Review/ analysis of MOR's in preparation of filing.	0.50	485.00	242.50
05/20/2025	JNK	B210	Debtors' counsel status update meeting (0.3); Conference call with Stikeman regarding wind down of Canadian proceedings (0.2)	0.50	485.00	242.50
05/20/2025	MAL	B210	Internal meetings, telephone conferences with BDO and emails with KeyBank counsel regarding wind down issues	1.70	780.00	1,326.00
05/21/2025	JNK	B210	Research relating to federal mining regulations.	3.20	485.00	1,552.00
05/21/2025	LL	B210	File Monthly Operating Reports	0.40	375.00	150.00
05/22/2025	JNK	B210	Telephone call with Trustee regarding analysis of trust agreements.	0.30	485.00	145.50
05/22/2025	MAL	B210	Various discussions, meetings and review regarding finalizing DEP settlement terms and agreement	2.50	780.00	1,950.00
05/23/2025	JNK	B210	Communications with Trustee regarding property owners.	0.30	485.00	145.50
05/23/2025	MAL	B210	Various discussions, meetings and review of draft terms regarding wind down period and budget items	3.50	780.00	2,730.00
05/23/2025	MAL	B210	Various wind down and vendor issues and communications with client regarding same	1.20	780.00	936.00
05/26/2025	JNK	B210	Draft letter to trustee relating to trust agreements and escrow account disposition.	0.90	485.00	436.50
05/27/2025	MAL	B210	Attention to and various emails and discussions regarding wind down process, budget and issues	1.80	780.00	1,404.00
05/27/2025	MJR	B210	Communications with client regarding status of open matters (0.2); follow up regarding same (0.4)	0.60	860.00	516.00
05/29/2025	MAL	B210	Emails and telephone calls regarding certain asset disposal processes, review requirements regarding same.	1.10	780.00	858.00
05/30/2025	MAL	B210	Confirm status of various wind down processes and issues and discussions regarding same	2.20	780.00	1,716.00
Sub-total: B210 Business Operations						39,569.00

05/21/2025	DXS	B230	Conference with Debtors' professionals and counsel for KeyBank regarding extension of wind down budget and related issues	0.50	615.00	307.50
05/22/2025	DXS	B230	Review and analysis of final DIP Order and 1st stipulation extending use of cash collateral (.8); attention to drafting of second stipulation extending use of cash collateral (1.4); correspondence with M. Roesenthaler regarding inclusion of additional revisions (.2)	2.40	615.00	1,476.00
05/23/2025	DXS	B230	Review and analyze updated budget in advance of professionals' call and correspondence with Raines' team regarding the same (.4); Conference with Debtors' professionals and KeyBank regarding updated wind down budget (.5)	0.90	615.00	553.50
05/23/2025	MJR	B230	Revise cash collateral stipulation	2.30	860.00	1,978.00
05/23/2025	MJR	B230	Correspond with client regarding cash collateral order	0.10	860.00	86.00
05/25/2025	MJR	B230	Review revisions to cash collateral stip by KeyBank and correspond with client regarding same	0.20	860.00	172.00
05/26/2025	MJR	B230	Attention to cash collateral stip, including call with client and BDO, call with counsel for KeyBank and revision of the same	1.10	860.00	946.00
05/27/2025	MJR	B230	Correspond with the committee regarding cash collateral stip	0.10	860.00	86.00
05/27/2025	MJR	B230	Calls and correspondence with BDO and counsel for KeyBank regarding stipulation	0.30	860.00	258.00
05/27/2025	MJR	B230	Follow up on inquiry by KeyBank	0.20	860.00	172.00
05/28/2025	JNK	B230	Revise Stipulation for extending cash collateral and prepare for filing (0.3); communications with KeyBank and Committee counsel (0.2)	0.50	485.00	242.50
05/28/2025	MJR	B230	Follow up calls and communications with creditors regarding case disposition, continued use of cash collateral and related matters	0.40	860.00	344.00
Sub-total: B230 Financing / Cash Collateral						6,621.50
05/02/2025	DXS	B235	Review Morgan Stanley statement and correspondence with M. Lindsay and K. Harrigan regarding the same (.2)	0.20	615.00	123.00
05/30/2025	KJL	B235	Analysis of Second Stipulation with KeyBank modifying terms of final DIP order	0.60	875.00	525.00
Sub-total: B235 Financial Filings						648.00
05/19/2025	MJR	B260	Correspond with K. Harrigan regarding board call and related matters	0.10	860.00	86.00
05/21/2025	MJR	B260	Prepare for and participate in board meeting	0.70	860.00	602.00
Sub-total: B260 Board of Directors Matters						688.00

05/01/2025	MAL	B310	Review and draft revisions to DEP agreements and various discussions and communications regarding same.	2.50	780.00	1,950.00
05/02/2025	MAL	B310	Review and comment on amended consent order and trust agreement and telephone call with DEP regarding same.	1.80	780.00	1,404.00
05/02/2025	MJR	B310	Discussions with RFL team and DEP regarding environmental issues and potential settlement and work on same	2.10	860.00	1,806.00
05/05/2025	MAL	B310	Draft, review and revise motion to approve settlement with DEP, various discussions regarding same.	2.40	780.00	1,872.00
05/06/2025	MAL	B310	Various communications and review and revise regarding DEP agreements and settlement motion.	2.60	780.00	2,028.00
05/06/2025	MJR	B310	Call with counsel for surety and related follow up	0.60	860.00	516.00
05/07/2025	MAL	B310	Analyze and revise draft settlement motion and review related documents and claims	1.80	780.00	1,404.00
05/09/2025	MAL	B310	Review and revise potential settlement documents with DEP	1.60	780.00	1,248.00
05/12/2025	MAL	B310	Various discussions and communications with DEP counsel, review, analysis and preparation of settlement documents, motion and exhibits.	3.40	780.00	2,652.00
05/13/2025	MAL	B310	Review amended proposed DEP agreements, make revisions and various discussions and emails regarding same	2.20	780.00	1,716.00
05/13/2025	MJR	B310	Calls and communications relating to DEP settlement	0.60	860.00	516.00
05/14/2025	MAL	B310	Telephone conference with DEP, review and revise various DEP agreements and draft settlement motion and various follow up discussions and communications regarding same	3.80	780.00	2,964.00
05/19/2025	MAL	B310	Review and consider DEP comments regarding amended agreements and telephone call with B. Greenert regarding same.	1.00	780.00	780.00
05/21/2025	MJR	B310	Calls and communications with counsel for KeyBank, the Committee, and the PA DEP regarding global settlement regarding water treatment	2.10	860.00	1,806.00
05/21/2025	MJR	B310	Negotiations of environmental settlement and review and revise various iterations of 9019 motion and consent orders	6.80	860.00	5,848.00
05/22/2025	MJR	B310	Communications with DEP, counsel for KeyBank and the Committee regarding status of DEP settlement (0.3); review and revise settlement motion and consent order agreements (3.3); discussions with J. Kelly regarding same (0.3)	3.90	860.00	3,354.00
05/22/2025	MJR	B310	Additional follow up relating to DEP issues and settlement and calls with case parties regarding same	2.80	860.00	2,408.00
05/26/2025	MJR	B310	Review and revise K. Harrigan declaration and communications with K. Harrigan regarding same	2.10	860.00	1,806.00
05/27/2025	MJR	B310	Meeting with J. Kelly regarding upcoming 9019 motion and revise Harrigan declaration based on comments from same	0.40	860.00	344.00

05/29/2025	MAL	B310	Telephone call with B Greenert and various emails and coordination of settlement documents.	1.60	780.00	1,248.00
Sub-total: B310 Claim Administration and Objections						37,670.00

Sub-total Fees: \$200,176.50

Expenses

05/14/2025	Planet Depos, LLC: Deposition: Corporate Rep for Wilson Creek Energy - Kevin Harrigan - VIDEO Files, synchronization & Digital videos; Inv. #754699	749.00
05/14/2025	Planet Depos, LLC: TRANSCRIPT WITH INDEX OF:Kevin Harrigan - Designated Representative, Exhibits, Planet Summary; Inv. #754698	1,000.55
Sub-total Expenses:		<u>\$1,749.55</u>

Total Current Billing: **\$201,926.05**
Previous Balance Due: \$53,546.01
Total Now Due: \$255,472.06

Rate Summary

Ronald W. Crouch	18.30 hours at \$825.00/hr	\$15,097.50
Jordan N. Kelly	70.90 hours at \$485.00/hr	\$34,386.50
Lela Lescalette	1.60 hours at \$375.00/hr	\$600.00
Mark A. Lindsay	83.60 hours at \$780.00/hr	\$65,208.00
Kenneth J. Lund	1.50 hours at \$875.00/hr	\$1,312.50
Jesse D. Nelms	7.30 hours at \$425.00/hr	\$3,102.50
Michael J. Roeschenthaler	63.60 hours at \$860.00/hr	\$54,696.00
Tina A. Roeschenthaler	9.80 hours at \$670.00/hr	\$6,566.00
Michael J. Sally	1.10 hours at \$465.00/hr	\$511.50
Daniel R. Schimizzi	30.40 hours at \$615.00/hr	\$18,696.00
Total hours:	<u>288.10</u>	<u>\$200,176.50</u>

Trust Account

05/28/2025	Wire: Wilson Creek Holdings Inc.	Beginning Balance	\$19,768.79
			<u>100,000.00</u>
		Ending Balance:	\$119,768.79

Raines Feldman Littrell LLP
June 1, 2025 through June 3, 2025 Invoice



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

Invoice Date: 6/3/2025
Invoice Number: 134764

Corsa Coal, Corp. et al
Kevin M. Harrigan, President and CEO
1576 Storytown Road
PO Box 260
Friedens, PA 15541

8227-002 / Corsa Bankruptcy

Professional Services				Hours	Rate	Amount
06/02/2025	MJR	B110	Prepare for and participate in call with BDO and client regarding wind down and related follow up	0.60	860.00	516.00
06/02/2025	TAR	B110	Review Expedited Motion to Dismiss fr purposes of drafting corresponding Declaration of K. Harrigan in Support	0.70	670.00	469.00
06/03/2025	MJR	B110	Attention to wind down issues	0.40	860.00	344.00
06/03/2025	TAR	B110	Draft Declaration of K. Harrigan in Support of Expedited Motion to Dismiss the Chapter 11 Cases and Related Relief	5.60	670.00	3,752.00
Sub-total: B110 Case Administration						5,081.00
06/03/2025	JNK	B130	Coordinate preparation of deeds relating to PA DEP settlement.	0.60	485.00	291.00
06/03/2025	MAL	B130	Review sale documents and attention to various post-close issues to be resolved	1.70	780.00	1,326.00
06/03/2025	SEW	B130	Confer with M. Lindsay regarding transfers of permits and correspondence with buyers regarding same	0.40	575.00	230.00
Sub-total: B130 Asset Disposition						1,847.00
06/02/2025	JNK	B160	Multiple emails with Stikeman relating to fee statement and fee application (0.3); Revise final fee application per Stikeman comments (0.3)	0.60	485.00	291.00
06/02/2025	JNK	B160	Discussions regarding orders for final fee applications.	0.50	485.00	242.50
06/03/2025	DXS	B160	Attention to review of an revisions to final fee application and related exhibits	1.60	615.00	984.00

06/03/2025	JNK	B160	Communications with BDO regarding final fee applications	0.20	485.00	97.00
Sub-total: B160 Fee Applications/Objections						1,614.50
06/02/2025	DXS	B190	Continue review of and revisions to motion to dismiss (1.4); correspondence with Debtors' professionals regarding the same (.4); further review of revisions to related order and exhibits (.4); correspondence with Raines' team and chambers regarding scheduling of hearings and related deadlines (.4)	2.60	615.00	1,599.00
06/02/2025	JNK	B190	Revisions to multiple turns of Motion to Dismiss (1.5); discuss revisions to motion with RFL team (0.3)	1.80	485.00	873.00
06/02/2025	JNK	B190	Additional revisions to motion dismiss per discussions with Keybank and Committee and RFL team discussions regarding the same	1.20	485.00	582.00
06/02/2025	MAL	B190	Review and revise motion to dismiss and various discussions and emails regarding same	2.20	780.00	1,716.00
06/03/2025	JNK	B190	Revise Raines final fee application.	1.40	485.00	679.00
06/03/2025	JNK	B190	Finalize Motion to Dismiss, proposed order and scheduling order.	2.50	485.00	1,212.50
06/03/2025	MAL	B190	Review and revise draft order on motion to dismiss and various discussions and emails regarding same.	1.50	780.00	1,170.00
Sub-total: B190 Other Contested Matters/ Omnibus Hearing						7,831.50
06/02/2025	MAL	B210	Telephone conference with BDO regarding various wind down issues and planning and review of wind down budget items	0.80	780.00	624.00
06/02/2025	MAL	B210	Review cash collateral stipulation and attention to wind down timeline and outstanding items to be resolved	1.80	780.00	1,404.00
06/02/2025	TAR	B210	Participate in call with Debtor and BDO relating to Wind Down checklist	0.80	670.00	536.00
Sub-total: B210 Business Operations						2,564.00
06/03/2025	SEW	B240	Confer with M. Lindsay regarding tax liability, review and analyze data pertaining to same, and draft proposed related correspondences	2.30	575.00	1,322.50
Sub-total: B240 Tax Issues						1,322.50
06/03/2025	MAL	B310	Attention to and handle various settlement items and issues related to DEP property transfers, various discussions and emails regarding same.	2.20	780.00	1,716.00

06/03/2025	MAL	B310	Follow up discussions regarding deed descriptions and preparation for property transfers, review of parcel details.	1.10	780.00	858.00
Sub-total: B310 Claim Administration and Objections						2,574.00

Sub-total Fees: \$22,834.50

Total Current Billing: **\$22,834.50**
 Previous Balance Due: **\$255,472.06**
 Total Now Due: **\$278,306.56**

Rate Summary

Jordan N. Kelly	8.80 hours at \$485.00/hr	\$4,268.00
Mark A. Lindsay	11.30 hours at \$780.00/hr	\$8,814.00
Michael J. Roeschenthaler	1.00 hours at \$860.00/hr	\$860.00
Tina A. Roeschenthaler	7.10 hours at \$670.00/hr	\$4,757.00
Daniel R. Schimizzi	4.20 hours at \$615.00/hr	\$2,583.00
Sarah Wenrich	2.70 hours at \$575.00/hr	\$1,552.50
Total hours:	<u>35.10</u>	<u>\$22,834.50</u>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Exhibit E

Customary and Comparable Compensation

Exhibit E

Customary and Comparable Compensation

Category of Timekeeper	Blended Hourly Rate	
	Billed Firm-wide for preceding year (6/4/24 to 6/4/25)	Billed This Application
Partner	\$801.50	\$781.41
Counsel	\$710.00	\$762.36
Associate	\$505.50	\$503.32
Aggregated	\$672.33	\$682.36

Exhibit F

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
	Doc. No.:
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Hearing Date:
Movant,	Hearing Time:
v.	Response Deadline:
NO RESPONDENT.	

ORDER OF THE COURT

AND NOW, this ____ day of _____, 2025, upon due consideration of the foregoing *Final Fee Application of Raines Feldman Littrell, LLP, for Payment of Compensation and Reimbursement of Expenses for the Period of April 1, 2025 through June X, 2025 and Request for Expedited Hearing* (the “Application”) filed by Raines Feldman Littrell, LLP, counsel to the above-captioned debtors (collectively, the “Debtors”), and the Court having reviewed the Application and any objections filed thereto; and the Court finding that: (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (ii) venue of these chapter 11 cases and the Application is proper under 28 U.S.C. §§ 1408 and 1409; (iii) notice of the

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holdings, Inc. (7733); Maryland Energy Resources, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

Application, the opportunity to object, and for the hearing thereon was provided and sufficient under the circumstances; and (iv) based on the forgoing, no further notice or hearing is required and good cause exists to grant the relief requested in the Application,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is **APPROVED** as set forth herein.
2. Raines Feldman Littrell, LLP ("Raines"), is allowed compensation for professional services rendered to the Debtors during the Final Application Period in the amount of \$1,866,000.50 and reimbursement of expenses billed during the Final Application Period in the amount of \$41,443.27.
3. The Debtors are authorized to forthwith pay Raines \$278,306.55, representing the total compensation sought in connection with this Application and consisting of the 20% holdback from the April Fee Statement, after applying credit for amounts previously paid to Raines by the Debtors pursuant to the April Fee Statement, and 100% of the fees and expenses rendered for services during the May Monthly Period and June Monthly Period.
4. Raines is allowed final compensation for prospective professional services rendered to the Debtors in accordance with and up the amounts approved under the Extended Wind Down Budget and the Second Cash Collateral Stipulation, provided that Raines shall file with the Court a final statement of actual fees and expenses rendered during period of June 4, 2025 through and including the date of dismissal these Chapter 11 Cases.
5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

Prepared by: /s/ Michael J. Roeschenthaler

Michael J. Roeschenthaler, Counsel to the Debtors

BY THE COURT

The Honorable Jeffrey A. Deller
United States Bankruptcy Court

Exhibit G

Expedited Scheduling Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	Case No.: 25-70001-JAD
WILSON CREEK ENERGY, LLC, <i>et al.</i>,¹	Chapter 11
Debtors.	<i>Jointly Administered</i>
WILSON CREEK ENERGY, LLC, <i>et al.</i>,	Doc. No.:
Movant,	Related to Document No.
v.	Hearing Date:
Respondents.	Hearing Time:
	Response Deadline:

**ORDER SETTING EXPEDITED HEARING AND RESPONSE DEADLINE
REGARDING FINAL FEE APPLICATION OF RAINES FELDMAN LITTRELL LLP
FOR PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF JANUARY 6, 2025 THROUGH JUNE 3, 2025**

AND NOW, this ____ day of _____, 2025, NOTICE IS
HEREBY GIVEN THAT a *Request for an Expedited Hearing* to consider entry of the *Final Fee Application of Raines Feldman Littrell LLP for Payment of Compensation and Reimbursement of Expenses for the Period of January 6, 2025 Through June 3, 2025 and Request for Expedited Hearing* (the “Application”) filed in the above-referenced case:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Wilson Creek Energy, LLC (6202); Wilson Creek Holding, Inc. (7733); Maryland Energy Resource, LLC (5299); Mincorp Acquisition Corp. (4858); Mincorp Inc. (5688); PBS Coals, Inc. (2413); Roxcoal, Inc. (3768); Quecreek Mining, Inc. (1745), Croner, Inc. (0529); Elk Lick Energy, Inc. (8551); and Corsa Coal Corp. (0027). The Debtors’ address is 1576 Stoystown Road, Friedens, Pennsylvania 15541.

On or before _____, ***responses*** to the request for approval of the Application shall be filed with the Clerk of the Bankruptcy Court and served on the parties in interest.

A hearing will be held on _____ ***at*** _____ ***.M (EST)*** before Judge Jeffery A. Deller in Courtroom D, 54th Floor, U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219. Unless otherwise ordered, parties may also appear for non-evidentiary matters remotely by utilizing the Zoom video conference platform (“Zoom”). To participate in the hearing via Zoom, use the following link no later than ten (10) minutes prior to your scheduled hearing time: <https://www.zoomgov.com/j/16009283473>, or alternatively, you may use the following Meeting ID: 160 0928 3473. All participants appearing remotely via Zoom or otherwise must comply with the Notice of Temporary Modification of Procedures Before the Honorable Jeffery A. Deller For Matters Scheduled On or After November 1, 2023 (“Judge Deller’s Zoom Procedures”), which can be found on the Court’s website at <https://www.pawb.uscourts.gov/content/judge-jeffery-deller>. Persons without video conferencing capabilities must immediately contact Chambers staff at (412) 644-4710 to make alternate arrangements if they desire to participate remotely. Absent emergency circumstances, such arrangements must be made no later than three (3) business days prior to the hearing. All persons are also reminded that pursuant to the Court’s Notice and Order, and as set forth in Judge Deller’s Zoom Procedures, the public’s recording or duplication of any audio or video of the hearing is strictly prohibited.

The Debtors shall serve a copy of this completed Scheduling Order and the Application by (1) overnight mail **or** (2) facsimile **or** (3) email (separate from CM/ECF) in accordance with the

Case Management Order [Doc. No. 39]. The Debtors shall immediately file a certificate of service indicating such service.

Prepared by: /s/ Michael J. Roeschenthaler
Michael J. Roeschenthaler, Counsel to the Debtors

BY THE COURT:

Honorable Jeffery A. Deller
United States Bankruptcy Court