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ATTORNEYS FOR THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS OF VISION2SYSTEMS LLC

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:	§	
	§	Chapter 11
VISION2SYSTEMS LLC,	§	
	§	Case No. 25-40583-mxm11
Debtor.	§	

FEE APPLICATION SUMMARY COVER SHEET

First and Final Fee Application of: Munsch Hardt Kopf & Harr, P.C.

Capacity: Attorneys for the Official Committee of Unsecured Creditors

Time Period: March 18, 2025 – February 6, 2026

Bankruptcy Petition Filed On: February 19, 2025

Date of Entry of Retention Order: April 24, 2025

Status of Case: Plan Confirmation Under Advisement

Amount Requested:

Fees:	\$ <u>46,872.00</u>
Expenses:	\$ <u>773.45</u>
Other:	\$ <u>00.00</u>
Total:	\$ <u>47,645.45</u>

Reductions:

Voluntary Fee Reductions:	\$ <u>00.00</u>
Expense Reductions:	\$ <u>00.00</u>
Total Reductions:	\$ <u>00.00</u>

Draw Down Request:

Retainer Received: \$ 00.00
Previous Draw Down(s) \$ 00.00
Remaining Retainer (now): \$ 00.00
Requested Draw Down: \$ 00.00
Retainer Remaining (after): \$ 00.00

Expense Detail:

Copies – Per Page Cost / Total: \$ 00.00
Fax – Per Page Cost / Total: \$ 00.00
Computer Research: \$ 00.00
Other: \$ 00.00
Other: Mailings \$ 773.45

Hourly Rates

Attorney/Accountant

Paralegal/Clerical

Highest Billed Rate: \$ 650.00
Total Hours Billed: 6.50
Blended Rate: \$ 488.36

\$ 250.00
00.10
\$ 235.16

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In re:	§	
	§	Chapter 11
VISION2SYSTEMS LLC,	§	
	§	Case No. 25-40583-mxm11
Debtor.	§	

**FIRST AND FINAL FEE APPLICATION OF MUNSCH HARDT KOPF & HARR, P.C.
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM MARCH 18, 2025, THROUGH AND INCLUDING FEBRUARY 6, 2026**

**NO HEARING WILL BE CONDUCTED HEREON, AND THE
HEARING SCHEDULED HEREON MAY BE CANCELLED
WITHOUT FURTHER NOTICE, UNLESS A WRITTEN
RESPONSE IS FILED WITH THE CLERK OF THE UNITED
STATES BANKRUPTCY COURT, 501 W. 10TH ST., FORT
WORTH, TEXAS 76102-3643 BEFORE CLOSE OF
BUSINESS ON MARCH 4, 2026, WHICH IS AT LEAST 21
DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED
WITH THE CLERK, AND A COPY SHALL BE SERVED
UPON COUNSEL FOR THE MOVING PARTY PRIOR TO
THE DATE AND TIME SET FORTH HEREIN. IF A
RESPONSE IS FILED A HEARING MAY BE HELD WITH
NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS
TIMELY REQUESTED, THE RELIEF REQUESTED SHALL
BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY
ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR
THE NOTICED ACTION MAY BE TAKEN, AND THE
HEARING SCHEDULED ON THIS MOTION MAY BE
CANCELLED, WITHOUT FURTHER NOTICE.**

TO THE HONORABLE MARK X. MULLIN, U.S. BANKRUPTCY JUDGE:

COMES NOW Munsch Hardt Kopf & Harr, P.C. ("Munsch Hardt") counsel for the Official Committee of Unsecured Creditors (the "Committee") of Vision2Systems LLC (the "Debtor"), the debtor and debtor-in-possession in the above-captioned chapter 11 bankruptcy case (the "Bankruptcy Case"), and files this its *First and Final Fee Application of Munsch Hardt Kopf & Harr, P.C. for Compensation and Reimbursement of Expenses for the Period from March 18, 2025, through and including February 6, 2026* (this "Application") requesting the entry of an order (the "Proposed Order"), substantially in the form attached to this Application as Exhibit A, granting final allowance of (i) compensation for professional services to the Committee during the period from March 18, 2025, through and including February 6, 2026 (the "Application Period") in the amount of \$46,872.00 (the "Requested Fees"), and (ii) reimbursement of 100% of the actual and necessary expenses incurred by Munsch Hardt during the Application Period, in the amount of \$773.45 (the "Requested Expenses"). In support of this Application, Munsch Hardt respectfully states as follows:

I. JURISDICTION AND VENUE

1. On February 19, 2025 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, commencing the Bankruptcy Case.
2. The Court has jurisdiction over the Bankruptcy Case and this Application pursuant to 28 U.S.C § 1334. This Application constitutes a core proceeding within the meaning of 28

U.S.C. § 157(b)(2). Venue of the Bankruptcy Case and this Application in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and other bases for the relief requested herein are Bankruptcy Code sections 105(a), 330, 331, and 1103; Bankruptcy Rule 2016; and Local Rule 2016-1.

II. MUNSCH HARDT'S EMPLOYMENT AND COMPENSATION

4. On March 13, 2025, the United States Trustee appointed the Committee [Docket No. 51]. The Committee's members are: (1) Christ Presbyterian Church, (2) Christ's Church of Oronogo, (3) Mitchell Road Presbyterian Church, (4) Mobberly Baptist Church, (5) NorthRidge Church, (6) One Church Home, and (7) Saddleback Valley Community Church. Andrew M. Hill was selected as Chairperson of the Committee.

5. Pursuant to the appropriate resolutions and procedures, the Committee selected Munsch Hardt to represent it during the Bankruptcy Case.

6. On April 1, 2025, the Committee filed its *Application for Order Authorizing Employment of Munsch Hardt Kopf & Harr, P.C. as Attorneys for the Official Committee of Unsecured Creditors of Vision2Systems LLC* [Docket No. 74] (the "Retention Application"), which included the *Declaration of Thomas D. Berghman* [Docket No. 74-1] (the "Berghman Declaration").

7. On April 24, 2025, the Court entered its *Order Authorizing Employment of Munsch Hardt Kopf & Harr, P.C. as Attorneys for the Official Committee of Unsecured Creditors of Vision2Systems LLC* [Docket No. 99] (the "Retention Order") authorizing the employment of Munsch Hardt as of March 18, 2025.

8. The terms and conditions of Munsch Hardt's employment and compensation are set forth in the Retention Application, Retention Order, and Berghman Declaration. Munsch Hardt

has no agreement of any kind, express or implied, to divide with any other person or entity any portion of the compensation sought or to be received by it in the Bankruptcy Case.

9. This is Munsch Hardt's first and final application for compensation.

10. Munsch Hardt is submitting this Application for allowance, on a final basis, of compensation for services rendered in the total amount of \$50,947.00 and reimbursement of actual and necessary expenses in the total amount of \$773.45, for a total of \$51,720.45 for the Application Period.

III. SUMMARY OF SERVICES

11. Exhibit B attached hereto details the Requested Fees and Requested Expenses during the Application Period. A summary of the same is provided below.

A. Task 01 General Bankruptcy Advice (\$12,271.50)

12. During the Application Period, Munsch Hardt incurred \$12,271.50 in fees related to the "General Bankruptcy Advice" task code. Activities under the "General Bankruptcy Advice" task code consisted of conferring with the members of the Committee, preparing the Committee bylaws, handling other administrative matters, and communicating with other Estate professionals. The services performed under the "General Bankruptcy Advice" task code were actual and necessary services which Munsch Hardt performed for the benefit of the Estate. Accordingly, Munsch Hardt requests allowance and payment of the same.

B. Task 02 Investigation (\$13,500.00)

13. During the Application Period, Munsch Hardt incurred \$13,500.00 in fees related to the "Investigation" task code. Activities under the "Investigation" task code consisted of a thorough investigation of the viability of claims held by the Estate. Munsch Hardt's investigation consisted of gathering and reviewing relevant documents from a variety of sources. Pursuant to

Munsch Hardt's investigation, Munsch Hardt prepared an analysis for the Committee regarding potential Estate claims. The services performed under the "Investigation" task code were actual and necessary services which Munsch Hardt performed for the benefit of the Estate. Accordingly, Munsch Hardt requests allowance and payment of the same.

C. Task 03 Communications with Creditors (non-committee) (\$565.00)

14. During the Application Period, Munsch Hardt incurred \$565.00 in fees related to the "Communications with Creditors (non-committee)" task code. Activities under the "Communications with Creditors (non-committee)" task code consisted of limited communications and conferences with creditors not on the Committee. The services performed under the "Communications with Creditors (non-committee)" task code were actual and necessary services which Munsch Hardt performed for the benefit of the Estate. Accordingly, Munsch Hardt requests the allowance and payment of the same.

D. Task 04 Plan / Disclosure Statement (\$4,443.50)

15. During the Application Period, Munsch Hardt incurred \$4,443.50 in fees related to the "Plan / Disclosure Statement" task code. Activities under the "Plan / Disclosure Statement" task code consisted of reviewing drafts of the Debtor's disclosure statement and plan of reorganization, providing advice on the same to the Committee, providing comments to the Debtor regarding the disclosure statement and plan, and attending hearings on the disclosure statement and plan. The services performed under the "Plan / Disclosure Statement" task code were actual and necessary services which Munsch Hardt performed for the benefit of the Estate. Accordingly, Munsch Hardt requests allowance and payment of the same.

E. Task 05 Contested Matters (\$11,112.50)

16. During the Application Period, Munsch Hardt incurred \$11,112.50 in fees related to the “Contested Matters” task code. Activities under the “Contested Matters” task code consisted of attending the 341 meeting, reviewing and providing an analysis of *Saddleback Valley Community Church’s Motion for Rule 2004 Examination of the Debtor and its Officers* [Docket No. 49], preparing the Committee’s *Joinder to Saddleback Valley Community Church’s Motion for Rule 2004 Examination of the Debtor and its Officers and Request for Deposition* [Docket No. 92], and coordinating the production of documents with other Estate professionals. The services performed under the “Contested Matters” task code were actual and necessary services which Munsch Hardt performed for the benefit of the Estate. Accordingly, Munsch Hardt requests allowance and payment of the same.

F. Task 06 Employment (\$4,979.50)

17. During the Application Period, Munsch Hardt incurred \$4,979.50 in fees related to the “Employment” task code. Activities under the “Employment” task code consisted of preparing and filing the Retention Application, Berghman Declaration, and Retention Order, and preparing this Application. The services performed under the “Employment” task code were actual and necessary services which Munsch Hardt performed for the benefit of the Estate. Accordingly, Munsch Hardt requests allowance and payment of the same.

G. Expenses (\$773.45)

18. During the Application Period, Munsch Hardt incurred \$773.45 in expenses. These expenses were passed through to the Estate “at cost” and consist of mailing costs during the Bankruptcy Case. Munsch Hardt submits that these expenses are all reasonable and qualify for full reimbursement.

IV. ARGUMENTS AND AUTHORITIES

12. Under section 330 of the Bankruptcy Code, the Court may allow reasonable compensation for actual and necessary professional services rendered by a professional in the case, determining the reasonableness of the compensation requested based upon the nature, extent, and value of such services to the estate. Similarly, the Court may allow the reimbursement of actual and necessary expenses incurred by a professional in connection with the rendition of services. Specifically, section 330 provides in pertinent part:

(a)(1) ...the court may award to ...a professional person employed under section 327 or 1103 ... –

(A) reasonable compensation for actual, necessary services rendered by the ... professional person, or attorney and by any paraprofessional person employed by any such person;

(B) reimbursement for actual, necessary expenses.

...

(3) In determining the amount of reasonable compensation to be awarded, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including–

(A) the time spent on such services;

(B) the rates charged for such services;

(C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

(D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(1) & (3).

13. The Fifth Circuit has held that the five factors set out in section 330(a)(3) of the Bankruptcy Code are the most relevant to fee determinations in bankruptcy cases. *See, e.g., Peele v. Cunningham (In re Texas Securities, Inc.)*, 218 F.3d 443, 445 (5th Cir. 2000). Of additional relevance are the twelve factors set forth by the Fifth Circuit in the seminal case of *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974).

14. In evaluating the reasonableness of fees requested under section 330, bankruptcy courts use the lodestar method, computed by multiplying the number of hours reasonably spent on the work by the prevailing hourly rate and then adjusted upward or downward based on certain factors, including those contained in section 330(a)(3). *ASARCO, LLC v. Jordan Hyden Womble Culbreth & Holzer, P.C. (In re ASARCO, LLC)*, 751 F.3d 291, 295 (5th Cir. 2014) (citations omitted). The Fifth Circuit has held that “if a fee applicant establishes that its services were ‘necessary to the administration’ of a bankruptcy case or ‘reasonably likely to benefit’ the bankruptcy estate ‘at the time at which [they were] rendered,’ then the services are compensable.” *Edwards Family P’ship v. Johnson (In re Cmty. Home Fin. Servs.)*, 990 F.3d 422, 427 (5th Cir. 2021) (quoting *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 783 F.3d 266, 276 (5th Cir. 2015) (en banc)). “In awarding fees, hindsight is irrelevant; retrospect is irrelevant; material benefit to the bankruptcy estate is irrelevant. What matters is that, prospectively, the choice to pursue a course of action was reasonable.” *Id.* (cleaned up).

15. Here, application of any of the Bankruptcy Code’s or the Fifth Circuit’s factors and case law support the allowance of the Requested Fees and the Requested Expenses. As explained

above, and as listed in detail on Exhibit B, Munsch Hardt's Requested Fees and Requested Expenses:

- are reasonable based on the hourly rates charged in relation to the local market and in relation to the rates charged by comparable professionals, with the \$488.36 blended rate being well within (and on the lower side of) rates charged by comparable attorneys for similar cases;
- are reasonable based on the experience and hourly rate of the attorneys used, meaning that Munsch Hardt staffed this representation efficiently to ensure that there was no "overkill;"
- are reasonable based on the allocation of work and staffing of the representation, and the avoidance of duplication and unnecessary services;
- are beneficial because they enabled the Debtor to comply with its duties and to advance the Bankruptcy Case for the benefit of all creditors and parties-in-interest;
- represent actual time spent by Munsch Hardt on the representation employing contemporaneous and detailed time entries in the process; and
- were incurred by persons skilled and experienced in their various fields of expertise and practice.

19. Therefore, based on the representations in this Application, Exhibit B hereto, the Court's own familiarity with the Bankruptcy Case and the proceedings therein, and on any evidence presented by Munsch Hardt at the hearing on this Application, if any, Munsch Hardt submits that its Requested Fees and Requested Expenses are fully allowable.

V. CONCLUSION

WHEREFORE, PREMISES CONSIDERED, Munsch Hardt respectfully requests that the Court (i) enter the Proposed Order in substantially the same form as the one attached hereto, and (ii) grant Munsch Hardt such other and further relief to which it may show itself to be justly entitled.

RESPECTFULLY SUBMITTED this 11th day of February, 2026.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Jacob J. King

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Texas Bar No. 24082683
Jacob J. King
Texas Bar No. 24136951
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**ATTORNEYS FOR THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS OF
VISION2SYSTEMS LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 11th day of February 2026, true and correct copies of this Application, together with the exhibits attached hereto, were electronically served by the Court's CM/ECF system on parties entitled to notice in this Bankruptcy Case.

By: /s/ Jacob J. King

Jacob J. King

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:	§	
	§	Chapter 11
VISION2SYSTEMS LLC,	§	
	§	Case No. 25-40583-mxm11
Debtor.	§	

**ORDER GRANTING FIRST AND FINAL FEE APPLICATION OF MUNSCH
HARDT KOPF & HARR, P.C. FOR COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD FROM MARCH 18, 2025, THROUGH
AND INCLUDING FEBRUARY 6, 2026**

CAME ON FOR CONSIDERATION, the *First and Final Fee Application of Munsch Hardt Kopf & Harr, P.C. for Compensation and Reimbursement of Expenses for the Period from March 18, 2025, through and including February 6, 2026* (the “Application”), filed by Munsch Hardt Kopf & Harr, P.C. (“Munsch Hardt”), counsel for the Official Committee of Unsecured Creditors (the “Committee”) of Vision2Systems LLC (the “Debtor”). Having considered the Application, finding that notice and service of the Application were sufficient and appropriate, finding that no party objected to the Application, and otherwise finding cause for granting the Application based on the representations therein, it is hereby:

ORDERED that the Application is APPROVED on a final basis; it is further

ORDERED that Munsch Hardt is ALLOWED on a final basis, fees for its services to the Committee during the Bankruptcy Case in the amount of \$46,872.00 and reimbursement for Munsch Hardt's reasonable and necessary expenses in the amount of \$773.45, for a total amount of fees and expenses allowed on a final basis in the amount of \$47,645.45; it is further

ORDERED that pursuant to the *Findings of fact, Conclusions of Law, and Order Approving the Second Amended Plan of Liquidation of Vision2Systems, LLC* [Docket No. 182] and the *Second Amended Plan of Liquidation of Vision2Systems LLC* [Docket No. 158] (the "Plan") the Post-Confirmation Debtor, as that term is defined in the Plan, is hereby ordered to pay to Munsch Hardt from the Administrative Reserve as provided in the Plan; it is further

ORDERED that this Court shall retain exclusive and continuing jurisdiction to hear and determine any controversies arising from the interpretation, implementation, or enforcement of this Order.

END OF ORDER

Submitted by:

Thomas D. Berghman
Texas Bar No. 24082683
Jacob J. King
Texas Bar No. 24136951
MUNSCH HARDT KOPF & HARR, P.C.
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ATTORNEYS FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS
OF VISION2SYSTEMS LLC



Ross Tower
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605
Main 214.855.7500
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Vision2Systems Official Committee of Unsecured Creditors

Attn: Thomas Berghman
500 N. Akard, Suite 4000
Dallas, TX 75201

Invoice Date: January 12, 2026
Invoice Number: 10578332
Matter Number: 023735.00001

*For Professional Services through **December 31, 2025***

Client: Vision2Systems Official Committee of Unsecured Creditors
Matter: Chapter 11

Total Fees	\$	46,872.00
Total Costs	\$	<u>773.45</u>
Total Balance Due	\$	47,645.45

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

MH Federal ID Number: 75-2096964

For billing inquiries, please contact accounting@munsch.com or (214) 740-5198.

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 023735.00001

Invoice Number: 10578332

Client: Vision2Systems Official Committee of Unsecured Creditors

Matter Description: Chapter 11

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January 12, 2026

Fee Detail

Task Code: 01 General Bankruptcy Advice/ Committee Meetings/ Committee Matters

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/18/25	TDB	Confer and conference call with A. Hill regarding case matters (.4); prepare for and attend all-hands Committee call (1.5)	1.90	1,140.00
03/19/25	JJK	Review schedules and SOFA and provide recommendation on conflicts check (.3); prepare committee bylaws (1).	1.30	520.00
03/20/25	TDB	Conference call with A. Hill regarding case matters (1); confer with H. Valentine, J. King, A. Hill regarding bylaws, retention application (.2)	1.20	720.00
03/21/25	TDB	Prepare for and partial attendance at 341 meeting of creditors (.6); confer with J. King regarding same (.1); Correspondence with E. Schmidt, J. Kathman regarding same (.1); confer with H. Valentine regarding bylaws (.1)	0.90	540.00
03/22/25	HJV	Review email from Andrew Hill (.1). Prepare bylaws to be sent to the members via DocuSign (.2). Email to T. Berghman regarding same (.2).	0.50	117.50
03/24/25	HJV	Email to Committee members regarding bylaws (.1). Send bylaws via DocuSign to Committee members (.3).	0.40	94.00
03/24/25	TDB	Coordinate bylaws execution (.1); conference call with J. Kathman regarding case issues (.3)	0.40	240.00
04/03/25	HJV	Update docket with recent filings (.2). Attention to calendaring hearing date and deadlines (.1).	0.30	70.50
04/08/25	TDB	Correspondence with A. Hill regarding upcoming committee call	0.10	60.00
04/09/25	TDB	Prepare for and attend UCC meeting	1.50	900.00
04/11/25	TDB	Conference call with H. Jobe regarding case developments (.2); correspondence with UST, J. Kathman regarding conference on motion to convert or appoint trustee (.2)	0.40	240.00
04/11/25	HJV	Update docket with recent filings (.1). Attention to calendaring amended hearing date (.1).	0.20	47.00
05/01/25	TDB	Confer with A. Hill regarding upcoming hearing matters (.2); prepare for and attend committee call (.8); prepare for and attend continued 2004 motion hearing and confer with J. Kathman regarding same (.5)	1.50	900.00
06/02/25	JJK	Confer with A. Hill regarding meeting time. Correspondence regarding production of documents with debtor's counsel and T. Berghman.	0.30	120.00
06/03/25	TDB	Prepare for and attend conference call with A. Hill regarding case update (.8); confer with J. Kathman regarding trustee motion hearing (.2)	1.00	600.00
06/05/25	TDB	Prepare for and attend committee conference call	1.00	600.00
07/03/25	TDB	Prepare for and attend conference call with committee regarding plan draft update and other case matters	1.00	600.00
07/29/25	TDB	Status correspondence with committee	0.10	60.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 023735.00001

Invoice Number: 10578332

Client: Vision2Systems Official Committee of Unsecured Creditors

Matter Description: Chapter 11

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January 12, 2026

08/01/25	HJV	Attention to calendaring new hearing date.	0.10	23.50
08/17/25	HJV	Update docket with recent filings.	0.30	70.50
09/16/25	HJV	Update docket with recent filings.	0.10	23.50
09/17/25	JJK	Review the Committee by-laws and advise on compliance with Committee rules.	0.40	160.00
09/26/25	JJK	Review questions from the Committee and propose answers.	0.50	200.00
10/02/25	JJK	Attend meet and confer with T. Berghman and Committee.	0.10	40.00
10/07/25	JJK	Correspondence to T. Berghman regarding committee questions.	0.20	80.00
10/27/25	TDB	Prepare for and attend conference call with committee	1.10	715.00
10/27/25	JJK	Confer with committee regarding decision on the plan.	1.10	440.00
11/11/25	HJV	Attention to calendaring confirmation hearing.	0.10	25.00
12/01/25	TDB	Prepare for and attend confirmation hearing, confer with various counsel regarding same (4.5)	4.50	2,925.00
Total for 01			22.50	12,271.50

Task Code: 02 Investigation

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/07/25	TDB	Correspondence with C. Jones regarding data turnover	0.10	60.00
05/08/25	JJK	Coordinate discovery with debtor's counsel.	0.10	40.00
05/12/25	JJK	Confer with C. Jones and T. Berghman regarding discovery.	0.20	80.00
05/12/25	TDB	Prepare for and attend call with C. Jones regarding data turnover	0.30	180.00
05/14/25	TDB	Confer with C. Jones regarding 2004 matters	0.10	60.00
05/14/25	JJK	Review of document from creditor.	0.20	80.00
05/18/25	TDB	Correspondence with K. Carney regarding 2004	0.10	60.00
05/23/25	TDB	Correspondence with C. Jones regarding data transfer	0.20	120.00
05/27/25	TDB	Correspondence with Kathman regarding trustee motion hearing	0.10	60.00
06/02/25	TDB	Confer with J. King regarding data intake	0.10	60.00
06/03/25	JJK	Correspondence with debtor's counsel and paralegal to coordinate production of data and documents.	0.20	80.00
06/04/25	TDB	Confer with C. Jones regarding 2004 examination (.1); Correspondence with S. Ramsey regarding Vision2 (.1)	0.20	120.00
06/16/25	JJK	Confer with T. Berghman regarding lien issues.	0.20	80.00
06/17/25	JJK	Research regarding liens on assets of the estate. Attend meeting with secured lender.	0.80	320.00
06/17/25	TDB	Prepare for and attend conference call with L. Lankford regarding Vision2 plan (.6); debrief with J. King regarding same (.2); correspondence with J. Kathman regarding follow-up (.1)	1.00	600.00

Munsch Hardt Kopf & Harr, P.C.

Matter Number: 023735.00001

Invoice Number: 10578332

Client: Vision2Systems Official Committee of Unsecured Creditors

Matter Description: Chapter 11

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January 12, 2026

07/01/25	JJK	Analyze proposed schedules for principals and prepare brief analysis for T. Berghman regarding the same.	0.50	200.00
08/05/25	TDB	Confer with J. Kathman regarding personal financial statements/bank account statements for principals in connection with plan review/releases	0.30	180.00
08/12/25	TDB	Correspondence with committee regarding plan, secured lender review	0.20	120.00
08/13/25	JJK	Prepare memorandum on proof of claim and plan.	1.20	480.00
08/19/25	JJK	Prepare memorandum on validity of secured creditor's claim and plan.	0.30	120.00
08/20/25	JJK	Review proof of claim and plan and prepare memorandum on the same.	2.10	840.00
08/23/25	JJK	Prepare memorandum on CGC proof of claim and plan.	1.50	600.00
08/24/25	JJK	Prepare memorandum on CGC proof of claim and plan.	1.90	760.00
08/27/25	JJK	Prepare memorandum on CGC claim and plan. Proof and send to T. Berghman. Review bank statements and prepare analysis.	2.50	1,000.00
09/04/25	JJK	Confer with T. Berghman regarding research on estate claims.	0.20	80.00
09/08/25	TDB	Correspondence with Kathman, J. King regarding AmEx statements	0.10	60.00
09/08/25	JJK	Correspondences with J. Kathman and T. Berghman regarding production of bank statements. Review bank statements.	0.50	200.00
09/10/25	JJK	Prepare and revise memorandum to committee.	1.80	720.00
09/15/25	TDB	Review/analysis of lender claim (.4); confer with J. King regarding same (.2); revisions to committee memo (.3); Correspondence with H. Jobe regarding disclosure statement objection (.2)	1.10	660.00
09/15/25	JJK	Correspondences regarding discovery and review of claims (.2). Revise memorandum after comments from T. Berghman (2.2). Review and analysis of the disclosure statement (.8). Prepare objection to the disclosure statement (1.1).	4.30	1,720.00
09/16/25	JJK	Review case law regarding usury claims and defenses in Texas (1.5). Revise memorandum on estate claims, the plan, and the CGC proof of claim (.8). Confer with A. Hill regarding meeting attendance (.2). Attend and record notes at Committee meeting and debrief with T. Berghman (1)	3.50	1,400.00
09/18/25	JJK	Review of correspondences regarding Committee document review.	0.10	40.00
09/22/25	JJK	Correspondence and review of lending documents regarding priority of claims (.2). Review bank statements and provide analysis to T. Berghman (2). Propose curative language for the disclosure statement (.3)	2.50	1,000.00
09/29/25	JJK	Review bank statements and accounts for principals.	0.80	320.00
10/03/25	JJK	Correspondence regarding exempt assets of principals.	0.20	80.00

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10/06/25	JJK	Correspondence with H. Chapin regarding documentation to prove exempt assets and setoff.	0.20	80.00
10/11/25	JJK	Correspondence regarding sharing documents.	0.10	40.00
10/13/25	JJK	Review documents for CMA account sent by principals.	0.20	80.00
10/15/25	JJK	Complete review and analysis of bank statements.	1.80	720.00
Total for 02			31.80	13,500.00

Task Code: 03 Communications with Creditors (non-committee)

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/19/25	TDB	Conference call with Carney regarding case status	0.40	240.00
10/02/25	TDB	Prepare for and attend conference call with Saddleback counsel	0.50	325.00
Total for 03			0.90	565.00

Task Code: 04 Plan / Disclosure Statement

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/23/25	TDB	Correspondence with Kathman regarding plan draft	0.20	120.00
05/27/25	JJK	Prepare summary of the debtor's original plan of reorganization.	1.30	520.00
06/10/25	TDB	Confer with J. Kathman regarding plan matters	0.20	120.00
06/12/25	JJK	Confer with J. Kathman, C. Jones, and L. Lankford regarding the plan.	0.50	200.00
06/15/25	TDB	Prepare correspondence to committee regarding plan updates and debrief of lender, debtor counsel call	0.60	360.00
06/20/25	TDB	Correspondence with key constituencies regarding extension of exclusivity	0.10	60.00
07/02/25	TDB	Prepare for and attend conference call with J. Kathman, J. King regarding plan status (.6); update correspondence with E. Schmidt (.2)	0.80	480.00
07/02/25	JJK	Confer with J. Kathman regarding the plan and other case issues.	0.40	160.00
07/07/25	HJV	Attention to calendaring hearing on motion to extend exclusivity period.	0.10	23.50
09/19/25	JJK	Proof and file the objection to the disclosure statement. Follow up with H. Chapin regarding bank statements.	0.40	160.00
09/22/25	TDB	Review key pleadings for DS and motion to dismiss hearing (.6); conference call with A. Hill regarding hearing and filed pleadings (.3); Correspondence with E. Schmidt regarding continuance (.1); prepare for and attend DS hearing and correspondence with key parties regarding same (2)	3.00	1,800.00
09/23/25	TDB	Prepare Disclosure Statement insert and correspondence with Kathman, J. King regarding same	0.30	180.00

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11/04/25	TDB	Correspondence with J. Kathman, committee regarding curative plan confirmation/order language	0.40	260.00
Total for 04			8.30	4,443.50

Task Code: 05 Contested Matters

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/21/25	JJK	Attend and take notes at 341 meeting of creditors (1.2); review 2004 and provide analysis of requests for production to T. Berghman (.3).	1.50	600.00
03/23/25	TDB	Correspondence with J. King, H. Jobe regarding protective order matters	0.10	60.00
03/26/25	TDB	Correspondence with J. Kathman, H. Jobe regarding 2004 requests	0.20	120.00
04/04/25	JJK	Attend the 341 meeting of creditors.	1.00	400.00
04/04/25	TDB	Correspondence with UST, H. Jobe, J. Kathman regarding 2004 motion, related matters and scheduling	0.20	120.00
04/04/25	TDB	Prepare for and attend continue 341 meeting and confer with J. King, H. Jobe regarding same	1.70	1,020.00
04/06/25	TDB	Review revised Kathman declaration in support of employment	0.10	60.00
04/07/25	TDB	Correspondence with K. Carney regarding 2004	0.10	60.00
04/10/25	JJK	Prepare joinder to the Rule 2004 Motion filed by Saddleback Valley Community Church.	1.40	560.00
04/14/25	JJK	Review and analysis of Saddleback Valley Community Church's 2004 Motion, requests for production, and interrogatories. Provide recommendation to T. Berghman on what the Committee should request in addition to the requests made by Saddleback Valley Community Church.	1.20	480.00
04/14/25	HJV	Update docket with recent filings (.1). Receipt and download audio files for the 341 meeting of creditors received from the UST (.2).	0.30	70.50
04/14/25	TDB	Correspondence with all relevant parties regarding hearing on trustee/conversion	0.20	120.00
04/15/25	JJK	Create condensed list of discovery requests and additional requests that may be advisable. Prepare joinder to 2004 Motion of Saddleback Valley Community Church and circulate to T. Berghman.	0.50	200.00
04/15/25	HJV	Download filings from court's docket and send to T. Berghman.	0.30	70.50
04/15/25	TDB	Confer with relevant counsel regarding trustee/conversion hearing setting (.1); review 2004 matters (.2); prepare for and attend conference call with A. Hill regarding next steps (.3)	0.60	360.00
04/16/25	HJV	Attention to calendaring hearing date and objection deadline regarding UST's Motion to Convert Case.	0.20	47.00

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04/16/25	TDB	Correspondence with committee regarding 2004 joinder and UST motion to convert/appoint trustee	0.20	120.00
04/17/25	JJK	Prepare joinder to 2004 and exhibit requesting additional documents.	1.10	440.00
04/17/25	TDB	Confer with J. King regarding 2004 issues	0.20	120.00
04/18/25	JJK	Review correspondence from J. Kathman regarding issues and clarifications regarding the 2004 joinder.	0.10	40.00
04/18/25	TDB	Finalize 2004 requests and confer with J. Kathman regarding same	0.30	180.00
04/21/25	JJK	Revise Joinder to Saddleback Valley Community Church's Rule 2004 motion in response to comments from Debtor's counsel. File and serve the Rule 2004 Motion.	0.90	360.00
04/21/25	TDB	Review draft 2004 joiner and finalize same and confer with J. King regarding same (.3)	0.30	180.00
04/22/25	JJK	Correspondence with H. Valentine regarding retention application. Confer with J. Kathman, L. Gleen, and T. Berghman regarding the 2004 motion and plan.	0.50	200.00
04/22/25	TDB	Correspondence with Debtor, Saddleback counsel regarding 2004 matters (.4); strategy correspondence with A. Hill regarding 2004 and other matters (.3); prepare for and attend conference call with debtor and Saddleback counsel regarding 2004 matters (.5)	1.20	720.00
04/23/25	TDB	Prepare for and attend hearing on protective order and 2004 (.8); confer with J. King regarding search terms (.2); conference call with E. Schmidt regarding case (.4)	1.40	840.00
04/23/25	HJV	Attention to calendaring continued hearing date.	0.20	47.00
04/23/25	HJV	Finalize and file certificate of no objection and upload order (.2). Email to courtroom deputy regarding proposed order (.1).	0.30	70.50
04/24/25	TDB	Prepare draft search terms and confer with J. King regarding same (.3); prepare for and attend meet/confer, plan discussion call with J. Kathman, J. King (1)	0.30	180.00
04/24/25	JJK	Revise search terms list in accordance with comments from T. Berghman. Confer with J. Kathman and T. Berghman regarding 2004 order, the plan, and insurance issues.	1.10	440.00
04/28/25	JJK	Confer with T. Berghman regarding 2004 Order. Prepare order on 2004 motion, exhibit with requests for production, and agreed search terms exhibit.	1.30	520.00
04/29/25	TDB	Confer with J. King regarding 2004 order, revise, and coordinate circulation of same	0.50	300.00
04/29/25	JJK	Correspondence with T. Berghman regarding 2004 Order and exhibits. Revise order on 2004 motion and exhibit.	1.00	400.00
04/30/25	TDB	Prepare for and attend call with J. Kathman regarding 2004 matters (.5); confer with A. Hill regarding hearing (.1)	0.60	360.00
04/30/25	JJK	Correspondence with J. Kathman and C. Jones regarding the agreed order on 2004 motion. Confer with J. Kathman, C. Jones, and T. Berghman regarding 2004 order and discovery.	0.60	240.00

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05/01/25	JJK	Review agreed order on motion for examination under rule 2004 and provide comments on changes.	0.20	80.00
05/05/25	JJK	Finalize 2004 agreed order and send to T. Berghman for review. Upload the agreed 2004 order for the Court's consideration.	0.50	200.00
05/05/25	TDB	Coordinate proposed order revisions with J. King and confer with J. King, J. Kathman regarding same	0.20	120.00
05/06/25	JJK	Finalize agreed order, upload for the Court's review, and notify the Court.	0.20	80.00
06/04/25	HJV	Update docket with recent filings (.1). Attention to calendaring new hearing date and objection deadline regarding motion to covert case (.1).	0.20	47.00
07/09/25	TDB	Correspondence with UST, debtor counsel regarding motion to convert setting	0.20	120.00
07/10/25	TDB	Correspondence with UST, debtor professionals regarding continuance of trustee motion hearing	0.10	60.00
07/30/25	TDB	Confer with Kathman regarding plan/case status	0.30	180.00
09/19/25	TDB	Confer with all counsel regarding continuing hearing	0.20	120.00
Total for 05			23.80	11,112.50

Task Code: 06 Employment

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/19/25	TDB	Confer with J. King regarding retention (.1); review/revise proposed bylaws and confer with A. Hill regarding same (.4); prepare for and attend conference call with J. Kathman regarding case matters (.9)	1.40	840.00
03/21/25	HJV	Prepare notice of appearance (.7). Prepare retention application, proposed order, and declarations (4.2).	4.90	1,151.50
03/25/25	JJK	Correspondence regarding conflicts check.	0.10	40.00
03/26/25	JJK	Prepare retention application, declarations, and proposed order for role as counsel to the committee (1.5).	2.60	1,040.00
03/27/25	TDB	RETENTION: Finalize draft retention pleadings and correspondence with A. Hill regarding same (.7) Cash C.: Correspondence with J. Kathman regarding secured creditor documents (.1)	0.80	480.00
03/27/25	JJK	Correspondence regarding preparation of application to employ Munsch Hardt. Revise retention documents, order, and exhibits.	0.30	120.00
03/31/25	JJK	Follow up regarding retention application (.1); review and finalize application to employ Munsch Hardt as committee counsel (.4).	0.50	200.00
03/31/25	TDB	Correspondence with J. King regarding retention	0.20	120.00
04/01/25	JJK	Prepare final versions of retention application for T. Berghman review. File and serve the retention application.	1.00	400.00

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04/01/25	TDB	Review redline retention application and coordinate filing of same with J. King	0.20	120.00
04/07/25	HJV	Compare declaration supporting the application to employ Spencer Fane with the amended declaration of Jason Kathman (.1). Email to T. Berghman regarding same (.1).	0.20	47.00
04/22/25	HJV	Prepare certificate of no objection on the Committee's Application to Employ Munsch Hardt.	0.60	141.00
04/23/25	JJK	Review and approve certificate of no objection for retention of Munsch Hardt Kopf & Harr, P.C. Prepare search terms for use in targeting discovery.	0.70	280.00
Total for 06			13.50	4,979.50
Total			100.80	\$46,872.00

Timekeeper Summary

<u>Timekeeper Title</u>	<u>Name</u>	<u>Initials</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Shareholder	Thomas D. Berghman	TDB	650.00	6.50	4,225.00
Shareholder	Thomas D. Berghman	TDB	600.00	32.30	19,380.00
Associate	Jacob J. King	JJK	400.00	52.70	21,080.00
Paralegal	Heather J. Valentine	HJV	250.00	0.10	25.00
Paralegal	Heather J. Valentine	HJV	235.00	9.20	2,162.00
Total				100.80	\$46,872.00

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/02/25	Mainstay Legal - Mailings - Mailout Copies and Postage	773.45
Total		\$773.45

Cost Summary

<u>Description</u>	<u>Amount</u>
Mailings	773.45
Total	\$773.45

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Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01	General Bankruptcy Advice/ Committee Meetings/ Committee Matters	22.50	12,271.50
02	Investigation	31.80	13,500.00
03	Communications with Creditors (non-committee)	0.90	565.00
04	Plan / Disclosure Statement	8.30	4,443.50
05	Contested Matters	23.80	11,112.50
06	Employment	13.50	4,979.50
Total		100.80	\$46,872.00



Ross Tower
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Dallas, Texas 75201-6605
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Vision2Systems Official Committee of Unsecured Creditors
Attn: Thomas Berghman
500 N. Akard, Suite 4000
Dallas, TX 75201

Invoice Date: January 12, 2026
Invoice Number: 10578332
Matter Number: 023735.00001

*For Professional Services through **December 31, 2025***

Client: Vision2Systems Official Committee of Unsecured Creditors
Matter: Chapter 11

Total Fees	\$	46,872.00
Total Costs	\$	<u>773.45</u>
Total Balance Due	\$	47,645.45

ACH and Wire Instructions:

BOKF, NA (FFC Bank of Texas, NA)
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 4000
Dallas, TX 75201-6605

Include Client or Matter Number and Invoice Number with remittance.

Payments by credit card or eCheck: <https://www.munsch.com/payment>. A 2.5% service fee will be added to credit card payments.

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