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Corporation, dba E Tropical Fish, Former Chapter
8 11 Debtor and Debtor-in-Possession

9 **UNITED STATES BANKRUPTCY COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

11 In re:

12 CIS International Holdings (N.A.)
Corporation,

13 Debtor.

Case No. 2:25-bk-18374-BR

Chapter 7

Hon. Barry Russell

**FIRST AND FINAL APPLICATION FOR
COMPENSATION AND REIMBURSEMENT
OF FEES AND EXPENSES INCURRED
BETWEEN SEPTEMBER 22, 2025 AND
OCTOBER 23, 2026 BY ERVIN COHEN &
JESSUP LLP AS GENERAL BANKRUPTCY
COUNSEL TO CHAPTER 11 DEBTOR AND
DEBTOR-IN-POSSESSION;
DECLARATION OF BYRON Z. MOLDO IN
SUPPORT THEREOF**

[No hearing required pursuant to LBR 9013-1(o)]

21 **TO THE HONORABLE BARRY RUSSELL, UNITED STATES BANKRUPTCY**
22 **JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL PARTIES IN**
23 **INTEREST:**

24 Ervin Cohen & Jessup LLP (“ECJ”), general bankruptcy counsel to CIS International
25 Holdings (N.A.) Corporation, dba E Tropical Fish, the former chapter 11 debtor and debtor-in-
26 possession (the “**Debtor**”), hereby submits its First and Final Application for Compensation and
27 Reimbursement of Expenses by Ervin Cohen & Jessup LLP as General Bankruptcy Counsel to
28 Chapter 11 Debtor and Debtor-in-Possession (the “**Application**”) for services rendered and

18899.1:12550439.1

1 expenses incurred during the period of September 22, 2025 through October 23, 2026 (the “**Subject**
2 **Period**”). ECJ respectfully requests that the Court grant this Application and allow, on a final basis,
3 compensation of \$167,091.50 in fees and \$1,665.74 in expenses incurred during the Subject Period,
4 for a total of \$168,757.24, which constitutes all of the compensation ECJ seeks in this case.

5 (i) **Name of Applicant:** Ervin Cohen & Jessup LLP

6 (ii) **Type of services rendered:** General bankruptcy counsel to the Debtor.

7 (iii) **Date of filing of petition under Chapter 11:** September 22, 2025 [Dkt. No. 1].

8 (iv) **Date of entry of Order Approving Applicant’s Employment:** December 3, 2025
9 [Dkt. No. 132], approving the application to employ ECJ, effective as of September 22, 2025.

10 (v) **Date of entry of Order Converting Case to Chapter 7:** October 22, 2025 [Dkt.
11 No. 80].

12 (vi) **Date of filing of last Fee Application:** This is ECJ’s first and final fee application.

13 (vii) **Total fees and costs allowed or paid to Applicant to date:** \$0.00 allowed;
14 \$36,588.50 in fees paid from ECJ’s pre-petition retainer, of which \$26,051.00 was applied to
15 fees for the Subject Period and is subject to approval by this Application, and \$10,537.50 was
16 applied to fees for pre-petition services.

17 (a) Retainer received: \$50,000

18 (b) Retainer remaining as of the date of this Application: \$13,411.50.

19 (c) Total amount requested in all prior applications: \$0.00.

20 (d) Total amount actually paid pursuant to prior approved applications: \$0.00.

21 (e) Total amount due but unpaid pursuant to prior approved applications: \$0.00.

22 (f) Total amount allowed but reserved pending final fee application: \$0.00.

23 (viii) **Amount requested in this Application:** \$167,091.50 in fees and \$1,665.74 in
24 expenses, for a total of \$168,757.24.

25 (ix) **Net amount requested to be paid:** \$127,629.00 in fees and \$1,665.74 in expenses,
26 for a total of \$129,294.74, after crediting the \$26,051.00 already applied from ECJ’s retainer
27 to fees for the Subject Period and applying the remaining \$13,411.50 retainer balance.

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1 1. **Nature of ECJ's Representation**

2 ECJ served as general bankruptcy counsel to the Debtor in its chapter 11 case from the
3 Petition Date (defined below) until the case was converted to chapter 7 on October 22, 2025. After
4 conversion, ECJ continued to represent the Debtor in connection with its duties as a chapter 7 debtor,
5 including preparation of the final report required by Federal Rule of Bankruptcy Procedure 1019(5),
6 attendance at the meeting of creditors under 11 U.S.C. § 341(a), and cooperation with the chapter 7
7 trustee, David M. Goodrich (the “**Trustee**”).

8 2. **Employment of ECJ**

9 On October 13, 2025, the Debtor filed its *Application of Debtor and Debtor-in-Possession*
10 *for Authority to Employ Ervin Cohen & Jessup LLP as General Bankruptcy Counsel, Effective*
11 *September 22, 2025* [Dkt. No. 40], together with a notice of opportunity to request a hearing under
12 LBR 9013-1(o) [Dkt. No. 41]. No party requested a hearing [Dkt. No. 125]. On December 3, 2025,
13 the Court entered its *Order Approving Application to Employ Ervin Cohen & Jessup LLP as General*
14 *Bankruptcy Counsel* [Dkt. No. 132], approving the application. The application sought ECJ's
15 employment effective as of September 22, 2025. A copy of the employment order is attached hereto
16 as Exhibit “2.”

17 3. **Period Covered by This First and Final Application**

18 This Application is made pursuant to 11 U.S.C. §§ 329 and 330, Federal Rule of Bankruptcy
19 Procedure 2016, and LBR 2016-1, and covers the period from September 22, 2025 through October
20 23, 2026. ECJ has not filed any prior fee application in this case.

21 4. **Events That Led to the Filing of the Petition**

22 The Debtor operated from its facility at 1405 W. 178th Street in Gardena, California, where
23 it imported and distributed tropical fish and aquatic products to retail customers, including Petco
24 Animal Supplies Stores, Inc. (“**Petco**”). In the months before the petition was filed, the Debtor
25 came under mounting pressure from its secured and merchant cash advance lenders. Panthers
26 Capital LLC (“**Panthers**”), which claimed to hold a security interest in the Debtor's accounts
27 receivable as assignee of Quick Funding, sued the Debtor and sought entry of default, and asserted
28 rights to the payments Petco owed the Debtor. Other lenders, including Settle Funding, LLC

1 (“Settle”) and Newtek Bank, N.A. (“Newtek”), also asserted UCC-1 liens on the Debtor’s assets.
2 At the same time, the Debtor faced threats of disconnection of its utility service, a potential unlawful
3 detainer proceeding, and a state court receivership affecting its landlord, Lionsrock Investments
4 LLC. Facing a liquidity crisis and the loss of access to its principal source of cash, the Debtor filed
5 a voluntary petition under chapter 11 of the Bankruptcy Code on September 22, 2025 (the “**Petition**
6 **Date**”) [Dkt. No. 1] to preserve its business and its accounts receivable for the benefit of its creditors.

7 5. **The Chapter 11 Case**

8 a. *Compliance With U.S. Trustee Requirements and Filing of Schedules*

9 Immediately after the Petition Date, ECJ assisted the Debtor in meeting its obligations as a
10 debtor-in-possession, including preparing and submitting the Office of the United States Trustee’s
11 seven-day package and required forms, opening a debtor-in-possession account, closing pre-petition
12 bank accounts, and providing proof of insurance. ECJ prepared the Debtor’s principals for, and
13 attended, the initial debtor interview and the § 341(a) meeting of creditors held on October 6, 2025.
14 ECJ also prepared and filed the Debtor’s Schedules and related documents on October 6, 2025 [Dkt.
15 No. 16], obtained an order extending the deadline to file the remaining schedules and statements
16 [Dkt. Nos. 17, 21], and filed *Schedule A/B* and the *Statement of Financial Affairs* on October 20,
17 2025 [Dkt. No. 65], after the Court denied the Debtor’s second request for an extension [Dkt. Nos.
18 51, 52].

19 b. *Stipulation With Petco for Turnover of Funds*

20 Petco was holding funds owed to the Debtor that were essential to the Debtor’s continued
21 operations. ECJ promptly made demand on Petco under 11 U.S.C. § 542, and thereafter, negotiated
22 a stipulation for turnover of those funds, then filed the stipulation on October 3, 2025 [Dkt. No. 15].
23 The Court approved the stipulation on October 7, 2025 [Dkt. No. 22]. Notably, after conversion to
24 Chapter 7, Panthers moved for reconsideration of the Order approving the stipulation [Dkt. No.
25 100]. Petco opposed the motion, supported by a declaration from ECJ attorney Chase Stone [Dkt.
26 No. 128], and Settle, Newtek, and the Trustee also opposed it [Dkt. Nos. 129–131]. The Court
27 denied the motion for reconsideration on December 24, 2025 [Dkt. No. 156].

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1 c. *Emergency First Day Motions*

2 On October 10, 2025, ECJ filed six emergency motions on the Debtor's behalf: (i) a motion
3 for order limiting notice [Dkt. No. 31]; (ii) a motion to pay pre-petition priority wages [Dkt. No.
4 32]; (iii) a motion to provide adequate assurance of future payment to utility companies under 11
5 U.S.C. § 366 [Dkt. No. 33]; (iv) a motion to pay pre-petition claims of critical vendors [Dkt. No.
6 34]; (v) a motion for authority to use cash collateral [Dkt. No. 35]; and (vi) a motion for permission
7 to file a memorandum exceeding 35 pages [Dkt. No. 36]. The motions were supported by the
8 omnibus declaration of the Debtor's principal, Charitha Samarasinghe [Dkt. No. 37], and a statement
9 regarding cash collateral [Dkt. No. 38].

10 Before and after filing the motions, ECJ worked with the Debtor's accountant to prepare a
11 13-week budget and negotiated with Panthers, Settle, Newtek, and other secured lenders for consent
12 to the Debtor's use of cash collateral, including a limited request to use cash collateral to pay priority
13 wages. Panthers filed a notice of non-consent [Dkt. No. 30], and the U.S. Trustee, Settle, Panthers,
14 and Southern California Gas Company filed oppositions [Dkt. Nos. 55–58, 64]. ECJ filed an
15 omnibus reply on October 20, 2025 [Dkt. No. 61] and argued the motions at the hearing on October
16 21, 2025. The Court denied each of the emergency motions by orders entered October 22, 2025
17 [Dkt. Nos. 73-78].

18 6. **Conversion to Chapter 7**

19 Without authority to use cash collateral, the Debtor could not continue operating. In the
20 days after the hearing, ECJ assisted the Debtor in identifying potential sources of debtor-in-
21 possession financing and other alternatives with the Debtor's principals, prospective lenders, and
22 secured creditors in an effort to keep the business operating. Following the hearing, on October 22,
23 2025, the Court entered its *Order Converting Case to Chapter 7* [Dkt. No. 80]. The Trustee was
24 appointed as interim chapter 7 trustee on October 23, 2025 [Dkt. No. 81].

25 7. **ECJ's Post-Conversion Services**

26 After conversion, the Debtor remained subject to its duties under 11 U.S.C. § 521 and
27 Federal Rule of Bankruptcy Procedure 1019. ECJ prepared and filed the *Final Report of Debtor as*
28 *Debtor in Possession Upon Conversion of Chapter 11 Case to Chapter 7 Case Pursuant to*

1 *Bankruptcy Rule 1019(5)* on November 18, 2025 [Dkt. No. 116]. Moreover, ECJ prepared the
2 Debtor's principals for, and attended, the post-conversion § 341(a) meeting of creditors, which
3 commenced on November 19, 2025, was continued to December 11, 2025 and January 5, 2026, and
4 concluded on January 5, 2026. Throughout this period, ECJ responded to the Trustee's requests for
5 documents and information about the Debtor's assets, bank accounts, receivables, liens, and
6 transactions with related entities.

7 ECJ also communicated with the Trustee regarding his emergency motion to abandon real
8 property [Dkt. Nos. 91, 120], his motion to reject the Debtor's unexpired nonresidential lease [Dkt.
9 Nos. 106, 155], and potential claims against Panthers, and it assisted in defending the Petco turnover
10 order against Panthers' motion for reconsideration. The Trustee filed a *Notice of Assets* on
11 December 4, 2025 [Dkt. No. 133], and the deadline for filing proofs of claim was March 9, 2026.

12 8. **Available Funds on Hand**

13 Based on information provided by the Trustee, as of October 26, 2026, the estate holds
14 approximately \$711,194.13 in cash. In addition, ECJ holds \$13,411.50 of the Debtor's pre-petition
15 retainer in its client trust account.

16 9. **Estimated Amount of Other Accrued Administrative Expenses**

17 ECJ is informed that the estate has incurred, and will continue to incur, chapter 7
18 administrative expenses including the Trustee's compensation under 11 U.S.C. § 326 and the fees
19 and costs of the Trustee's general bankruptcy counsel, Greenspoon Marder LLP [Dkt. No. 201], and
20 special litigation counsel, Richard P. Cook, PLLC [Dkt. No. 206]. Post-petition obligations incurred
21 during the chapter 11 case are listed in the Debtor's Rule 1019(5) final report [Dkt. No. 116]. ECJ
22 is not aware of any other chapter 11 professional that has sought allowance of fees.

23 10. **Prior Fee Applications and Payments to Applicant**

24 ECJ has not filed any prior fee applications in this case. Prepetition, ECJ received a retainer
25 of \$50,000 from the Debtor. ECJ has applied \$36,588.50 of the retainer as follows: (i) \$10,537.50
26 for pre-petition services rendered between September 8 and September 21, 2025; (ii) \$25,986.00 for
27 services rendered between September 22 and September 30, 2025; and (iii) \$65.00 for services
28 rendered on February 12, 2026. ECJ does not seek allowance of its fees for pre-petition services in

this Application. The remaining \$13,411.50 is held in ECJ's client trust account. ECJ has received no other payments in this case. To the extent the Court determines that ECJ's post-petition application of the retainer required prior authorization, ECJ requests that the Court approve those applications through this Application.

11. **Summary of Compensation Requested**

ECJ respectfully requests that the Court grant this First and Final Application and allow, on a final basis, compensation in the amount of \$167,091.50 in fees and \$1,665.74 in expenses incurred during the Subject Period, for a total of \$168,757.24, which constitutes all of the compensation ECJ seeks in this case. After crediting the \$26,051.00 already applied from the retainer to fees for the Subject Period and applying the remaining \$13,411.50 retainer balance, ECJ requests payment of the unpaid balance of \$127,629.00 in fees and \$1,665.74 in expenses, for a total of \$129,294.74.

Of the fees requested, \$114,768.00 was incurred during the chapter 11 case (September 22, 2025 through October 22, 2025), and \$52,323.50 was incurred after conversion (October 23, 2025 through October 23, 2026). Of the expenses requested, \$1,355.69 was incurred during the chapter 11 case and \$310.05 was incurred after conversion. ECJ professionals expended a total of 234.5 hours during the Subject Period, at a blended hourly rate of approximately \$712.55:

<i>Total Fees Incurred By ECJ For Services For The Subject Period: (By Professional)</i>			
PROFESSIONAL	HOURS	RATE	FEES
Byron Z. Moldo (Partner)	43.0	\$1,075.00	\$46,225.00
Byron Z. Moldo (Partner)	1.0	\$1,150.00	\$1,150.00
Jared Slater (Partner)	3.6	\$655.00	\$2,358.00
Chase A. Stone (Senior Associate)	148.1	\$650.00	\$96,265.00
Danielle R. Gabai (Associate)	16.3	\$550.00	\$8,965.00
Dylan Allen (Associate)	6.2	\$535.00	\$3,317.00
Tanner F. Hosfield (Associate)	2.4	\$515.00	\$1,236.00
Shantal Malmed (Associate)	13.9	\$545.00	\$7,575.50
Totals:	234.5		\$167,091.50

ECJ's expenses consist of the following categories. ECJ does not charge for secretarial or word-processing time, local telephone calls, or incoming facsimiles:

<i>Total Expenses Incurred By ECJ For The Subject Period:</i>		
CODE	DESCRIPTION	AMOUNT
E101	Copying	\$924.79
E106	Online Research	\$140.91
E107	Delivery Services/Messenger	\$324.90
E108	Postage	\$275.14
	Totals:	\$1,665.74

12. **Summary of Exhibits Attached in Support of Services Rendered**

Attached hereto are the following exhibits in support of this Application:

EXHIBIT	DESCRIPTION
"1"	Detailed billing records of the time spent by each professional for applicant, including a breakdown by activity code.
"2"	A copy of the <i>Order Approving Application to Employ Ervin Cohen & Jessup LLP as General Bankruptcy Counsel</i>
"3"	Firm Biographies/Curriculum Vitae

13. **Narrative of Services**

Detailed billing records for the Subject Period are attached hereto as Exhibit "1." ECJ's services are summarized below by activity code.

<i>Total Fees Incurred By ECJ For Services For The Subject Period: (By Activity Code)</i>			
CODE	DESCRIPTION	HOURS	FEES
B110	Case Administration	52.6	\$36,227.50
B120	Asset Analysis and Recovery	21.2	\$19,390.00
B130	Asset Disposition	5.2	\$3,422.50
B140	Relief from Stay/Adequate Protection Proceedings	1.5	\$975.00
B150	Meetings of and Communications with Creditors	21.2	\$14,460.00
B160	Fee/Employment Applications	33.3	\$20,470.50
B170	Fee/Employment Objections	0.2	\$130.00
B185	Assumption/Rejection of Leases and Contracts	1.5	\$975.00
B190	Other Contested Matters	9.5	\$6,276.00
B210	Business Operations	8.0	\$6,822.50
B230	Financing/Cash Collateral	62.7	\$45,397.50

B240	Tax Issues	3.6	\$3,275.00
B310	Claims Administration and Objections	1.0	\$777.50
B320	Plan and Disclosure Statement	0.7	\$497.50
B410	General Bankruptcy Advice/Opinions	2.9	\$1,885.00
B420	Restructurings	9.4	\$6,110.00
Totals:		234.5	\$167,091.50

Case Administration – B110: 52.6 hours; \$36,227.50. ECJ prepared and filed the Debtor’s chapter 11 petition, creditor matrix, and list of twenty largest creditors; prepared and submitted the U.S. Trustee’s seven-day package and USTLA forms and addressed the Debtor’s insurance, debtor-in-possession account, and pre-petition bank account requirements; prepared and filed the Debtor’s schedules and statements and the ex parte motions to extend the deadline to file them; prepared the motions to limit notice and to file a memorandum exceeding 35 pages; and monitored the docket and addressed filing deficiencies. After conversion, ECJ prepared and filed the Rule 1019(5) final report, responded to the Trustee’s general requests for documents and information, and drafted amendments to the schedules. ECJ also communicated regularly with the Debtor’s principals, its accountant, and counsel for interested parties regarding the status of the case. In September and October 2026, ECJ communicated with the Trustee’s counsel, counsel for Tokyo Century, and other parties in interest regarding a requested Rule 2004 examination, the location of estate assets and vehicle collateral, and the retention of separate counsel by the Debtor’s principal.

Asset Analysis and Recovery – B120: 21.2 hours; \$19,390.00. ECJ investigated the Debtor’s assets, including the receivables held by Petco and the Debtor’s potential claims against Panthers; prepared the demand on Petco and the stipulation for turnover of funds, coordinated the filing of the stipulation, and served the order approving it on Panthers; investigated Panthers’ asserted security interest and its assignment from Quick Funding; reviewed the Debtor’s insurance policies, tax returns, and inter-company transactions with related entities; and conferred with the Debtor’s accountant and principals, and later the Trustee, regarding estate assets, real property transactions, and potential claims against Panthers. After conversion, ECJ analyzed the recordation dates and priority of the UCC-1 liens against the Debtor’s assets and provided the Trustee with information and documents regarding the

Debtor's bank accounts, its receivables from Petco, and Panthers' accounts receivable statements.

Asset Disposition – B130: 5.2 hours; \$3,422.50. ECJ addressed the disposition of certain shipping containers; reviewed the Trustee's motion to abandon real property, Newtek's limited opposition, and Panthers' joinder, and communicated with the Trustee and the Debtor's principals regarding the motion and the continued hearing; reviewed the Trustee's notice of assets; and, following the conclusion of the § 341(a) meeting, followed up with the Trustee regarding vehicles and pre-petition liens.

Relief from Stay/Adequate Protection Proceedings – B140: 1.5 hours; \$975.00. ECJ reviewed correspondence from the Debtor's litigation counsel regarding the scope of the automatic stay as to the Debtor's principal, communicated with litigation counsel regarding extending the stay to related entities, and advised the Debtor's principal regarding relief from stay.

Meetings of and Communications with Creditors – B150: 21.2 hours; \$14,460.00. ECJ communicated with Ford Motor Credit Company LLC regarding the automatic stay; negotiated with Petco's counsel regarding the § 542 demand and turnover stipulation; prepared for and attended the initial debtor interview and the October 6, 2025 § 341(a) meeting; communicated with Settle, Panthers, Newtek, DB Group America, Golden State Water, and counsel for the Small Business Administration regarding cash collateral, critical vendor payments, and their respective claims and liens; after conversion, conferred with the Trustee in preparation for the chapter 7 § 341(a) meeting, prepared the Debtor's principals for and attended the meeting, and followed up on the documents requested at the meeting; and conferred with the Trustee regarding creditor inquiries and with Petco's counsel regarding the facts supporting Mr. Stone's declaration.

Fee/Employment Applications – B160: 33.3 hours; \$20,470.50. ECJ prepared the application to employ ECJ and the related notice, declaration of non-opposition, and lodged order [Dkt. Nos. 40, 41, 125, 126]; prepared applications to employ Dominic LoBuglio as the Debtor's accountant and BPM LLP as special accountant, including the required disclosures and statements of disinterestedness; prepared ECJ's fee statements for September and October 2025; and began preparation of this Application.

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1 ECJ began preparing this Application in November 2025, when it reviewed the applicable
2 Local Bankruptcy Rules, began drafting the Application and supporting declaration, and analyzed
3 ECJ's eligibility for compensation under 11 U.S.C. §§ 327 and 330. ECJ resumed work on the
4 Application in September 2026. Between September and October 2026, ECJ reviewed its billing
5 records for the Subject Period, drafted and revised the Application, coordinated with its billing
6 department to generate updated billing statements and exhibits, reviewed the docket, conferred with
7 the Trustee's counsel regarding the funds held by the estate, and reviewed the Local Bankruptcy Rules
8 governing notice of the Application.

9 Fee/Employment Objections – B170: 0.2 hours; \$130.00. ECJ reviewed and edited its
10 employment application to confirm the required disclosures and proposed order language.

11 Assumption/Rejection of Leases and Contracts – B185: 1.5 hours; \$975.00. ECJ conferred
12 with the Debtor's litigation counsel regarding the Panthers litigation, UCC-1 issues, and the resolution
13 of a three-party agreement, and, after conversion, reviewed the lodged order on the Trustee's motion
14 to reject the Debtor's lease.

15 Other Contested Matters – B190: 9.5 hours; \$6,276.00. ECJ reviewed the status of the state
16 court litigation pending against the Debtor; prepared, filed, and served notices of the bankruptcy stay
17 in the state court and workers' compensation proceedings pending against the Debtor; conferred with
18 the Debtor's litigation counsel and the Trustee regarding the Panthers litigation, including removal and
19 jurisdictional issues; reviewed Panthers' reply in support of its motion for reconsideration and
20 communicated with Petco's counsel regarding Panthers' asserted security interest; and addressed
21 personal guaranty litigation filed against the Debtor's principal and a motion to be relieved as counsel
22 in related litigation.

23 Business Operations – B210: 8.0 hours; \$6,822.50. ECJ prepared the emergency motion to
24 provide adequate assurance of future payment to utility companies under 11 U.S.C. § 366, including
25 the list of utility providers and proposed deposits; advised the Debtor regarding its continued
26 operations, including proof of insurance, accounting issues with Petco, payments to related entities, and
27 Southern California Gas Company's objection; and, following the October 21, 2025 hearing, negotiated
28 with the Debtor's principals and secured creditors regarding the possibility of continued operations.

1 Financing/Cash Collateral – B230: 62.7 hours; \$45,397.50. ECJ worked with the Debtor's
2 accountant to prepare the budget, cash forecast, and projections; prepared the emergency motions for
3 use of cash collateral, payment of critical vendors, and payment of pre-petition priority wages, together
4 with the supporting omnibus declaration, proposed orders, and notice of the emergency hearing, and
5 coordinated their filing and service; negotiated with Panthers, Settle, Newtek, and Woodmere for
6 consent to the use of cash collateral, including a limited request to use cash collateral to pay priority
7 wages; explored debtor-in-possession financing; analyzed the oppositions and prepared the omnibus
8 reply; and prepared for and argued the motions at the October 21, 2025 hearing.

9 Tax Issues – B240: 3.6 hours; \$3,275.00. ECJ advised the Debtor and its accountant regarding
10 sales tax returns, the Debtor's sales and use tax and workers' compensation accounts, the payment of
11 its tax obligations, and the preparation of the Debtor's 2024 tax return, and forwarded an Employment
12 Development Department inquiry to the Trustee.

13 Claims Administration and Objections – B310: 1.0 hours; \$777.50. ECJ reviewed Ford Motor
14 Credit Company's claims and supporting documents, communicated with the Trustee regarding liens,
15 and reviewed proofs of claim filed in the chapter 7 case, including duplicate claims filed by one creditor
16 and a claim filed by the Debtor's principal.

17 Plan and Disclosure Statement – B320: 0.7 hours; \$497.50. ECJ reviewed the Court's order
18 setting the initial status conference and related deadlines [Dkt. No. 3] and corrected the creditor matrix
19 to cure the 72-hour deficiency [Dkt. No. 2].

20 General Bankruptcy Advice/Opinions – B410: 2.9 hours; \$1,885.00. ECJ advised the Debtor's
21 principals regarding their options following the October 21, 2025 hearing, including debtor-in-
22 possession financing and conversion, and responded to the principals' inquiries regarding documents
23 and related litigation.

24 Restructurings – B420: 9.4 hours; \$6,110.00. Following conversion, ECJ coordinated the
25 transition to chapter 7, including compiling and delivering documentation to the Trustee regarding the
26 Debtor's UCC filings and related entities; conferred with the Trustee and the Debtor's principals
27 regarding next steps; analyzed the effect of the automatic stay on related litigation against non-debtors;
28 and communicated with the Debtor's principals, their counsel, Settle, Altbanc, and the Trustee

1 regarding proposed financing, a possible assignment transaction, the structuring of a new operating
2 entity, a letter of intent, and possible asset sale scenarios.

3 14. **ECJ's Fees Are Entitled to Administrative Expense Priority**

4 Compensation and reimbursement awarded under 11 U.S.C. § 330(a) is an administrative
5 expense under 11 U.S.C. § 503(b)(2) and is entitled to priority under 11 U.S.C. § 507(a)(2). Because
6 this case was converted, ECJ acknowledges that its allowed fees and expenses incurred during the
7 chapter 11 case are payable in accordance with 11 U.S.C. § 726(b).

8 15. **Employment and Post-Conversion Compensation**

9 ECJ was employed under 11 U.S.C. § 327(a) and is eligible for compensation under 11
10 U.S.C. § 330. On October 13, 2025, while the case was pending under chapter 11, the Debtor
11 applied for entry of an order under 11 U.S.C. § 327(a) authorizing the Debtor to employ ECJ as
12 general bankruptcy counsel, effective as of September 22, 2025 [Dkt. No. 40]. The application
13 stated that ECJ would seek approval of its compensation and reimbursement of its expenses under
14 11 U.S.C. §§ 330 and 331. No opposition was filed. On December 3, 2025, after the case was
15 converted to chapter 7 on October 22, 2025, the Court entered its *Order Approving Application to*
16 *Employ Ervin Cohen & Jessup LLP as General Bankruptcy Counsel* [Dkt. No. 132]. The order
17 recites the conversion, approves the application, and orders that “ECJ’s compensation as general
18 bankruptcy counsel is subject to 11 U.S.C. § 330.”

19 The Supreme Court’s decision in *Lamie v. United States Trustee*, 540 U.S. 526 (2004) does
20 not bar the requested award. In *Lamie*, counsel had been employed under § 327(a) to represent the
21 chapter 11 debtor-in-possession, and the Court held that conversion to chapter 7 terminated the
22 debtor’s status as debtor-in-possession and, with it, counsel’s employment under § 327. *Id.* at 531–
23 32. In *Lamie*, no order authorized counsel’s employment after conversion, so counsel could not be
24 compensated from the estate for post-conversion services. *Id.* at 538-39. Here, by contrast, the only
25 order authorizing ECJ’s employment was entered on December 3, 2025, approximately six weeks
26 after conversion. The Court entered that order in the chapter 7 case, with the conversion expressly
27 noted, and ordered that ECJ’s compensation “as general bankruptcy counsel is subject to 11 U.S.C.
28 § 330.” ECJ is therefore a “professional person employed under section 327” within the meaning

1 of § 330(a)(1).

2 Even apart from the employment order, *Lamie* recognizes that a debtor's former counsel
3 may be compensated from a chapter 7 estate when employed by the trustee with court approval. *Id.*
4 at 538-39; 11 U.S.C. § 327(e). Moreover, in applying *Lamie*, bankruptcy courts in this jurisdiction
5 have approved a trustee's employment of former debtor-in-possession counsel under § 327(e) for
6 the special purpose of providing transition services the trustee had requested, and awarded
7 compensation under § 330(a)(1) for those services on a retroactive basis. *See In re Johnson*, 397
8 B.R. 486, 492 (Bankr. E.D. Cal. 2008). The *Johnson* court found the exceptional circumstances
9 required in this circuit for retroactive compensation were, namely, a satisfactory explanation for the
10 absence of prior approval and services that significantly benefited the estate. *See id.* (citing *Okamoto*
11 *v. THC Fin. Corp. (In re THC Fin. Corp.)*, 837 F.2d 389, 392 (9th Cir. 1988); *Law Offices of Ivan*
12 *W. Halperin v. Occidental Fin. Grp., Inc. (In re Occidental Fin. Grp., Inc.)*, 40 F.3d 1059, 1062 (9th
13 Cir. 1994)).

14 Here, ECJ's post-conversion services, totaling \$52,323.50 in fees and \$310.05 in expenses,
15 were of the same kind as in *Johnson*, following *Lamie*: they were rendered so that the Debtor could
16 fulfill its obligations under 11 U.S.C. § 521 and Rule 1019(5), and they directly (and significantly)
17 assisted the Trustee in identifying and administering estate assets, including by cooperating with the
18 Trustee's requests for documents and information. As such, ECJ requests that the Court allow these
19 amounts. To the extent the Court determines that any portion of ECJ's post-conversion fees and
20 expenses is not payable from the estate, ECJ requests that the order so provide without prejudice to
21 ECJ's right to seek payment from the Debtor or other non-estate sources.

22 16. **ECJ's Services Were Necessary**

23 ECJ's services were necessary to assist the Debtor throughout both the chapter 11 and chapter
24 7 phases of the case. Upon the Petition Date, the Debtor required counsel to comply with U.S.
25 Trustee requirements, timely prepare and file schedules and statements, obtain turnover of funds
26 held by Petco, and seek authority to use cash collateral and pay critical vendors and employees.
27 Following conversion, the Debtor required counsel to prepare the Rule 1019(5) final report, prepare
28 for and attend the § 341(a) meeting of creditors, and respond to the Trustee's requests for

1 information. ECJ staffed the matter efficiently, with the majority of the work performed by an
2 associate at a lower billing rate under the supervision of a senior partner.

3 17. **ECJ's Services Benefitted the Estate**

4 ECJ's services provided a tangible benefit to the estate. ECJ obtained an order compelling
5 turnover of funds held by Petco and successfully opposed Panthers' subsequent motion for
6 reconsideration. ECJ further maintained the Debtor's compliance with its reporting and disclosure
7 obligations, allowing the Debtor to pursue a reorganization while that remained a viable path. After
8 conversion, ECJ cooperated with the chapter 7 trustee by furnishing the Debtor's records and
9 information regarding its assets, liens, and transactions, which aided the Trustee's administration of
10 the estate and resulted in the filing of a Notice of Assets [Dkt. No. 133].

11 18. **No Sharing of Compensation**

12 ECJ has not shared, and has not agreed to share, any compensation received or to be received
13 in this case with any person other than the partners and employees of ECJ, in accordance with 11
14 U.S.C. § 504 and Federal Rule of Bankruptcy Procedure 2016(a).

15 19. **Factors Affecting the Award of Compensation**

16 In determining reasonable compensation, the Court considers the nature, extent, and value
17 of the services rendered, including the time spent, the rates charged, whether the services were
18 necessary or beneficial at the time they were performed, whether they were completed within a
19 reasonable amount of time commensurate with the complexity and importance of the issues
20 presented, and whether the requested compensation is comparable to that charged by similarly
21 skilled practitioners in non-bankruptcy matters. 11 U.S.C. § 330(a)(3). Each of these factors
22 supports the requested award.

23 Overall, this case required ECJ to prepare and file a chapter 11 petition on an emergency
24 basis, obtain turnover of funds held by Petco, and prepare and prosecute six contested emergency
25 motions during the first month of the case, despite opposition from the United States Trustee and
26 multiple secured creditors. The services rendered were necessary and beneficial to the estate when
27 performed and were completed efficiently and effectively in light of the issues presented. ECJ's
28 hourly rates are its standard rates for bankruptcy and non-bankruptcy matters and are comparable to

those charged by practitioners of similar skill, experience, and reputation in the Los Angeles legal market. Biographies of the ECJ professionals who rendered services in this case are attached as Exhibit "3."

PRAYER

WHEREFORE, ECJ submits that the fees and expenses incurred are reasonable and necessary given the nature and complexity of the case, and prays for the Court to enter an Order:

1. Approving, on a final basis, fees to ECJ in the amount of \$167,091.50 and expenses of \$1,665.74 incurred during the Subject Period;

2. Approving ECJ's prior application of \$26,051.00 of its retainer to its fees for the Subject Period, and authorizing ECJ to apply the remaining retainer balance of \$13,411.50 to its allowed fees;

3. Authorizing and directing the Trustee to pay ECJ the unpaid balance of \$127,629.00 in fees and \$1,665.74 in expenses, as an allowed administrative expense, in accordance with 11 U.S.C. § 726(b);

4. Approving ECJ's total fees and costs in this case, on a final basis, in the amounts of \$167,091.50 in fees and \$1,665.74 in costs;

5. Approving the form and manner of notice of this Application and the hearing thereon; and

6. Granting such other and further relief as may be deemed just and proper.

DATED: October 27, 2026

ERVIN COHEN & JESSUP LLP

By: /s/ Shantal Malmed

Shantal Malmed
Attorneys for CIS International Holdings (N.A.)
Corporation, dba E Tropical Fish, Former Chapter
11 Debtor and Debtor-in-Possession

DECLARATION OF BYRON Z. MOLDO

I, Byron Z. Moldo, declare as follows:

1. I am a partner at Ervin Cohen & Jessup LLP (“**ECJ**”), and I am one of the attorneys of record for CIS International Holdings (N.A.) Corporation, dba E Tropical Fish, the former chapter 11 debtor and debtor-in-possession (the “**Debtor**”), in the above-captioned bankruptcy case. I have personal knowledge of the facts set forth herein, except those stated on information and belief, and as to those matters I believe them to be true. If called as a witness, I could and would testify competently thereto.

2. I submit this declaration in support of the First and Final Application for Compensation and Reimbursement of Expenses by Ervin Cohen & Jessup LLP as General Bankruptcy Counsel to Chapter 11 Debtor and Debtor-in-Possession (the “**Application**”). Capitalized terms not defined herein have the meanings given in the Application.

3. ECJ’s billing records attached hereto as **Exhibit “1”** accurately reflect the services rendered and expenses incurred by ECJ during the Subject Period of September 22, 2025 through October 23, 2026. I have reviewed the billing records and they are true and correct to the best of my knowledge.

4. The fees and expenses requested in this Application are reasonable and necessary in light of the complexity of this case and the services rendered.

5. The hourly rates charged by ECJ professionals during the Subject Period represent ECJ’s standard rates for bankruptcy and non-bankruptcy matters.

6. Before the Petition Date, ECJ received a retainer of \$50,000.00 from the Debtor. ECJ has applied \$36,588.50 of the retainer to its fees as described in the Application, and the remaining \$13,411.50 is held in ECJ’s client trust account. ECJ has received no other payments in this case.

7. ECJ has not shared, and has not agreed to share, any compensation received or to be received in this case with any person other than the partners and employees of ECJ.

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1 8. A true and correct copy of the Court's order approving ECJ's employment [Dkt. No.
2 132] is attached hereto as **Exhibit "2,"** and true and correct copies of the biographies of the ECJ
3 professionals who rendered services in this case are attached hereto as **Exhibit "3."**

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct to the best of my knowledge.

6 Executed on this October 27, 2026, at Beverly Hills, California.

7
8 /s/ Byron Z. Moldo
9 Byron Z. Moldo

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ERVIN COHEN & JESSUP_{LLP}

EXHIBIT “1”

Ervin Cohen & Jessup LLP

In re CIS International Holdings (N.A.) Corporation, Case No. 2:25-bk-18374-BR
Detailed Time Records — September 22, 2025 through October 23, 2026

Date	Timekeeper	Code	Description	Hours	Rate	Amount
09/22/2025	Moldo, Byron Z.	B110	Coordinate commencement of chapter 11	1.3	\$1,075.00	\$1,397.50
09/22/2025	Moldo, Byron Z.	B120	Review documents re Quick Funding and relationship to Panthers Capital	0.4	\$1,075.00	\$430.00
09/22/2025	Stone, Chase A.	B110	Prepare/draft petition; prepare/draft 20 largest creditors; send info to client re confirmation; prepare Schedules.	1.6	\$650.00	\$1,040.00
09/22/2025	Stone, Chase A.	B110	Review/draft petition; review service list; email to client re signature/verification; review petition; review tax returns/accounting re determination of assets/liabilities; teleconf. w/ B. Moldo re same.	1.6	\$650.00	\$1,040.00
09/22/2025	Stone, Chase A.	B110	Teleconf. w/ client re timing of petition; review/coordinate filing of matrix; send BestCase file to A. Antonio to coordinate and review/revise notice; prepare Top 20 creditors matrix for review.	0.5	\$650.00	\$325.00
09/22/2025	Stone, Chase A.	B110	Finalize petition; finalize service list; correspondence w/ A. Antonio re approving/uploading petition; teleconf. w/ client re update; review/email Edison re disconnect; call to Edison re same; review/send response to clietn re update about disconnectoin following imposition fo automatic stay.	1.4	\$650.00	\$910.00
09/23/2025	Stone, Chase A.	B320	Teleconf. re notice to Ford Motors re stay; follow-up email to client re confirming collection efforts by Ford ceasing.	0.3	\$650.00	\$195.00
09/23/2025	Stone, Chase A.	B150	Teleconf. w/ Z. Bohlender re Petco/542 demand; teleconf. w/ client re status of 542 and next steps re vendor motion.	0.6	\$650.00	\$390.00
09/23/2025	Stone, Chase A.	B320	Review/revise issues re creditor matrix; note 72-hour deadline to fix matrix.	0.2	\$650.00	\$130.00
09/24/2025	Moldo, Byron Z.	B320	Review 9/24/25 order re plan, disclosure, etc.	0.1	\$1,075.00	\$107.50
09/24/2025	Moldo, Byron Z.	B230	Telephone call to LoBuglio re preparation of budget for cash collateral	0.5	\$1,075.00	\$537.50
09/24/2025	Moldo, Byron Z.	B120	Review financial information	1.0	\$1,075.00	\$1,075.00
09/24/2025	Moldo, Byron Z.	B230	Telephone call to client, LoBuglio re preparation of budget and projections	0.5	\$1,075.00	\$537.50
09/24/2025	Moldo, Byron Z.	B120	Prepare letter to Fletcher re turnover of funds by Petco	0.2	\$1,075.00	\$215.00
09/24/2025	Moldo, Byron Z.	B190	Review status of pending state court lawsuits	0.3	\$1,075.00	\$322.50
09/24/2025	Stone, Chase A.	B110	Teleconf. w/ OUST counsel re petition.	0.2	\$650.00	\$130.00
09/24/2025	Stone, Chase A.	B320	Review/forward (for calendaring) status conf. order re plan deadlines (Judge Russell).	0.1	\$650.00	\$65.00
09/24/2025	Stone, Chase A.	B230	Prepare/continue drafting first day motions; review accounting information re budget.	1.3	\$650.00	\$845.00
09/24/2025	Stone, Chase A.	B230	Conf. w/ CIS client re next steps; balance sheets; P&L w/ proposed accountant for Estate (analysis for preparation of cash collateral motion).	0.7	\$650.00	\$455.00
09/24/2025	Stone, Chase A.	B230	Prepare/continue drafting motion first day motions.	1.2	\$650.00	\$780.00
09/24/2025	Stone, Chase A.	B230	Prepare/continue drafting first day motions; review service list.	1.2	\$650.00	\$780.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
09/25/2025	Moldo, Byron Z.	B110	Prepare letter to client re closure of pre-petition bank accounts	0.2	\$1,075.00	\$215.00
09/25/2025	Stone, Chase A.	B110	Email/review response from U.S. Trustee Ron Maroko re: denial of week extension request to submit 7-day package (Week of Rosh Hashanah).	0.2	\$650.00	\$130.00
09/25/2025	Moldo, Byron Z.	B110	Review notice of chapter 11 case	0.1	\$1,075.00	\$107.50
09/25/2025	Moldo, Byron Z.	B120	Telephone call to Fletcher re Petco turnover of property	0.3	\$1,075.00	\$322.50
09/25/2025	Moldo, Byron Z.	B150	Prepare letter to client re IDI and DIP requirements	0.2	\$1,075.00	\$215.00
09/25/2025	Moldo, Byron Z.	B120	Investigate Panthers security interest and assignment from Quick Funding	0.5	\$1,075.00	\$537.50
09/25/2025	Stone, Chase A.	B230	Teleconf. w/ Petco counsel A. Fletcher	0.3	\$650.00	\$195.00
09/25/2025	Stone, Chase A.	B230	Analyze UCC-1 filings; review priority argument re Petco; update cash collateral and critical vendor motion re same; prepare proposed order re cash collateral.	1.4	\$650.00	\$910.00
09/25/2025	Stone, Chase A.	B150	Review response from A. Fletcher re 542 demand; analyze. Forward inquiry.	0.2	\$650.00	\$130.00
09/25/2025	Stone, Chase A.	B230	Prepare/continue drafting first day motions; draft analysis; review/prepare factual background section.	0.6	\$650.00	\$390.00
09/26/2025	Stone, Chase A.	B210	Inquiry/request for proof of insurance from client for OUST; respond re same.	0.2	\$650.00	\$130.00
09/26/2025	Stone, Chase A.	B110	Review correspondence; teleconf. w/ Bank of CBC to forward to client re setting up DIP account.	0.1	\$650.00	\$65.00
09/26/2025	Stone, Chase A.	B150	Review email correspondence from A. Fletcher/respond re meeting and set up call.	0.2	\$650.00	\$130.00
09/26/2025	Stone, Chase A.	B150	Teleconf. w/ A. Fletcher re status of stipulation; order and discussion of next steps re Petco; follow-up re same.	0.8	\$650.00	\$520.00
09/26/2025	Stone, Chase A.	B110	Review/analyze insurance policies; teleconf. w/ client re updating insurance and renewing for UST; review/analyze inquiries from client; update information to include for UST; send email to R. Maroko.	0.9	\$650.00	\$585.00
09/29/2025	Moldo, Byron Z.	B120	Review client letter and supporting documents re possible assets	0.2	\$1,075.00	\$215.00
09/29/2025	Moldo, Byron Z.	B110	Discussions with client re preparation of 7 day package	1.0	\$1,075.00	\$1,075.00
09/29/2025	Moldo, Byron Z.	B230	Telephone call to LoBuglio re case status and cash collateral	0.3	\$1,075.00	\$322.50
09/29/2025	Moldo, Byron Z.	B120	Review liability insurance policy	0.3	\$1,075.00	\$322.50
09/29/2025	Moldo, Byron Z.	B230	Telephone call to Aron re payment of rent	0.2	\$1,075.00	\$215.00
09/29/2025	Moldo, Byron Z.	B110	Prepare 7 day package	0.6	\$1,075.00	\$645.00
09/29/2025	Moldo, Byron Z.	B310	Review Ford Motor Credit claims and supporting documents	0.3	\$1,075.00	\$322.50
09/29/2025	Moldo, Byron Z.	B110	Prepare statement of major issues for UST 7 day package	0.3	\$1,075.00	\$322.50

Date	Timekeeper	Code	Description	Hours	Rate	Amount
09/29/2025	Stone, Chase A.	B110	Review correspondence from client re CIS asset information; review policies sent from client re automobile and worker's compensation. Send information re seven-day package (reminder); send further information re general list of required insurance policies. Provide further detail/explanation re same and request immediate assistance.	0.6	\$650.00	\$390.00
09/29/2025	Stone, Chase A.	B110	Review USTLA Form 12; send to client for signature; prepare/finalize and send.	0.2	\$650.00	\$130.00
09/29/2025	Stone, Chase A.	B230	Review/respond to email re inquiries from S. Samarasinghe; conf. re next steps (critical vendors).	0.2	\$650.00	\$130.00
09/29/2025	Stone, Chase A.	B150	Respond to email from A. Fletcher re stipulation/legal issues.	0.1	\$650.00	\$65.00
09/29/2025	Stone, Chase A.	B110	Review USTLA Form 8; prepare to finalize/send to client for signature and submit.	0.2	\$650.00	\$130.00
09/29/2025	Stone, Chase A.	B110	Review USTLA Form 5.3 prepare to finalize/send to client for signature and submit.	0.2	\$650.00	\$130.00
09/29/2025	Stone, Chase A.	B110	Review USTLA Form 5.2; prepare to finalize/send to client for signature and submit.	0.2	\$650.00	\$130.00
09/29/2025	Stone, Chase A.	B110	Review USTLA Form 5.1; prepare to finalize/send to client for signature and submit.	0.3	\$650.00	\$195.00
09/29/2025	Stone, Chase A.	B110	Review USTLA Form 5; prepare to finalize/send to client for signature and submit.	0.3	\$650.00	\$195.00
09/29/2025	Stone, Chase A.	B110	Review USTLA Form 4; prepare to finalize/send to client for signature and submit.	0.1	\$650.00	\$65.00
09/29/2025	Stone, Chase A.	B110	Review USTLA Form 3; review/organize attachments; prepare to finalize/send to client for signature and submit.	0.5	\$650.00	\$325.00
09/29/2025	Stone, Chase A.	B110	Draft client communication summarizing UST seven-day package contents and next steps.	0.5	\$650.00	\$325.00
09/29/2025	Stone, Chase A.	B110	Prepare and revise Seven Day package w/ client (call/email exchange to confirm disclosures and financials; incorporate client edits).	0.9	\$650.00	\$585.00
09/29/2025	Stone, Chase A.	B110	Finalize UST seven-day package (review checklist, confirm completeness, formatting).	0.8	\$650.00	\$520.00
09/30/2025	Hosfield, Tanner F.	B190	Conference with C. Stone regarding action items; review email correspondence from B. Moldo and related documents regarding notice of stay.	0.4	\$515.00	\$206.00
09/30/2025	Moldo, Byron Z.	B230	Telephone call to LoBuglio re case status and budget	0.3	\$1,075.00	\$322.50
09/30/2025	Moldo, Byron Z.	B150	Telephone call from Golden State Water re outstanding balance and establishment of new accounts	0.2	\$1,075.00	\$215.00
09/30/2025	Moldo, Byron Z.	B190	Review status of pending state court litigation	0.5	\$1,075.00	\$537.50
09/30/2025	Moldo, Byron Z.	B120	Prepare stipulation for turnover of funds by Petco	0.4	\$1,075.00	\$430.00
09/30/2025	Moldo, Byron Z.	B230	Analyze financial reports and projections (.4); telephone call to LoBuglio re same (.2)	0.6	\$1,075.00	\$645.00
09/30/2025	Stone, Chase A.	B150	Draft/prepare CIS/Petco 542 stipulation; teleconf. w/ client re status of funding; send email to A. Fletcher (Petco counsel) and attach proposed stipulation.	0.9	\$650.00	\$585.00
10/01/2025	Hosfield, Tanner F.	B190	Conference with B. Moldo regarding notices of stay; review case dockets and judicial directories; prepare notice of stay and strategize via emails with B. Moldo; further revise notice of stay.	1.1	\$515.00	\$566.50

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/01/2025	Moldo, Byron Z.	B230	Telephone call to client re preparation of forecast and budget	1.0	\$1,075.00	\$1,075.00
10/01/2025	Moldo, Byron Z.	B120	Telephone call to Fletcher re turnover of funds by Petco	0.2	\$1,075.00	\$215.00
10/01/2025	Moldo, Byron Z.	B120	Telephone call to Bohlender, Luccarelli, Stone re Panthers Capital and claims	1.0	\$1,075.00	\$1,075.00
10/01/2025	Stone, Chase A.	B230	Teleconf. w/ D. LoBuglio accountant re balance sheet/P&L; review next steps w/ client.	1.1	\$650.00	\$715.00
10/01/2025	Stone, Chase A.	B185	Teleconf. w/ Z. Bohlender and CT counsel re litigation w/ Panthers; review UCC-1 issues; review next steps re usury and discuss resolving three-party agreement.	1.2	\$650.00	\$780.00
10/01/2025	Stone, Chase A.	B150	Review/respond to Draft Stipulation - Urgent (Petco/A. Fletcher) and coordination; assign correct matter once identified.	0.2	\$650.00	\$130.00
10/02/2025	Stone, Chase A.	B150	Email/follow-up to Petco re stipulation.	0.1	\$650.00	\$65.00
10/02/2025	Stone, Chase A.	B120	Review updated stipulation drafts; coordinate with A. Fletcher, G. Insana, and S. Gaenzel; forward to Sam/Varuni for approval.	0.3	\$650.00	\$195.00
10/03/2025	Moldo, Byron Z.	B240	Prepare letter to client re submission of sales tax returns	0.2	\$1,075.00	\$215.00
10/03/2025	Moldo, Byron Z.	B230	Telephone call to van Pohlot re DIP financing	0.3	\$1,075.00	\$322.50
10/03/2025	Moldo, Byron Z.	B240	Telephone call to LoBuglio re sales tax issues	0.4	\$1,075.00	\$430.00
10/03/2025	Hosfield, Tanner F.	B190	Review email and notice of Chapter 11 filing; prepare as exhibit to notice of stay; strategize with B. Moldo regarding notices; review service list; oversee filing and service of notice of stay.	0.5	\$515.00	\$257.50
10/03/2025	Stone, Chase A.	B120	Prepare/review stipulation and vendor list updates; coordinate with Debbie on ECF filing and service; confer with Sam/Varuni on vendor additions	1.6	\$650.00	\$1,040.00
10/03/2025	Stone, Chase A.	B240	Address sales/use tax account and workers' comp coordination (combining entities) with D. LoBuglio; outline response plan.	0.6	\$650.00	\$390.00
10/06/2025	Hosfield, Tanner F.	B190	Correspondence via emails with B. Moldo and C. Stone regarding filed notice of stay; review rejection notice and oversee re-submitting of notice of stay; email correspondence regarding same.	0.4	\$515.00	\$206.00
10/06/2025	Stone, Chase A.	B150	Review IDI date/time; review 341(a) date/time; provide instructions and request meeting w/ clients re preparation of the same.	1.1	\$650.00	\$715.00
10/06/2025	Moldo, Byron Z.	B110	Prepare schedules	1.2	\$1,075.00	\$1,290.00
10/06/2025	Stone, Chase A.	B110	Review/update schedules; teleconf. w/ clerk; review/revise motion re emergency/ex parte relief (extend time to file schedules); obtain signature from debtor principal.	0.9	\$650.00	\$585.00
10/06/2025	Stone, Chase A.	B150	Prepare for 341(a) meeting; teleconf. w/ client re preparation; send email to R. Maroko re driver's license for C. Samarsinghe.	0.6	\$650.00	\$390.00
10/06/2025	Stone, Chase A.	B190	Review email and inquiry Jaime Mendoza Gonzalez v. CIS (notice).	0.1	\$650.00	\$65.00
10/06/2025	Stone, Chase A.	B150	Teleconf.: IDI and 341(a) meeting of creditors.	1.5	\$650.00	\$975.00
10/06/2025	Stone, Chase A.	B110	Prepare/review/organize schedules to file w/ Court re cure deadline: Schedule E, F, G, H, and statement of related cases. Review w/ CIS principal and send to A. Antonio to finalize.	2.2	\$650.00	\$1,430.00
10/06/2025	Stone, Chase A.	B230	Review/draft motion re critical vendors; review/draft motion re cash collateral; instructions to D. Allen re same.	0.5	\$650.00	\$325.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/06/2025	Allen, Dylan	B110	Drafted motion to extend	1.0	\$535.00	\$535.00
10/07/2025	Gabai, Danielle R.	B110	Conf. with Chase Stone re case background.	0.4	\$550.00	\$220.00
10/07/2025	Gabai, Danielle R.	B160	Prepare application to employ ECJ.	1.2	\$550.00	\$660.00
10/07/2025	Moldo, Byron Z.	B190	Review client letter re pending worker's comp cases and status of cases	0.2	\$1,075.00	\$215.00
10/07/2025	Stone, Chase A.	B110	Conf. w/ support staff re uploading lodged order (conf. w/ clerk's office); approve/instruct office to upload proposed order extending time to file schedules.	0.2	\$650.00	\$130.00
10/07/2025	Stone, Chase A.	B110	Finalize proposed order extending time; address "Notice to Filer" deficiency;submit and confirm entry; circulate order and summary to team/client.	0.4	\$650.00	\$260.00
10/07/2025	Stone, Chase A.	B110	Respond to client inquiries re status of funds and filing timeline; set expectations on next deadlines.	0.3	\$650.00	\$195.00
10/07/2025	Stone, Chase A.	B190	Coordinate with B. Moldo and Z. Bohlender on AWP/common-interest and litigation exposure.	0.1	\$650.00	\$65.00
10/07/2025	Stone, Chase A.	B190	Confirm Notice of Stay mailing in Gonzalez and approach on workers' comp coordination (22STCV35612/03622).	0.2	\$650.00	\$130.00
10/07/2025	Stone, Chase A.	B230	Status call with D. LoBuglio re cash forecast, payroll status, Petco turnover mechanics; identify action items.	0.5	\$650.00	\$325.00
10/07/2025	Stone, Chase A.	B110	Address Notice of Deficiency re filing fees/creditor add; coordinate corrective filings and docket checks with A. Antonio/D. Perez.	0.2	\$650.00	\$130.00
10/07/2025	Stone, Chase A.	B160	Review ECJ employment application draft; comments/edits; coordinate with D. Gabai on CPA employment approach.	0.3	\$650.00	\$195.00
10/08/2025	Gabai, Danielle R.	B160	Further prepare employment application re ECJ; prepare proposed order granting application	3.3	\$550.00	\$1,815.00
10/08/2025	Gabai, Danielle R.	B160	Prepare application to employ DOMINIC LOBUGLIO as CPA for the Estate.	1.3	\$550.00	\$715.00
10/08/2025	Allen, Dylan	B230	Emergency Motion and order for Cash Collateral drafting	1.0	\$535.00	\$535.00
10/08/2025	Stone, Chase A.	B230	Review email re payroll from client/timing; email wire instructions to A. Fletcher.	0.2	\$650.00	\$130.00
10/08/2025	Moldo, Byron Z.	B230	Telephone call to client re updated projections and budget for cash collateral motion	1.0	\$1,075.00	\$1,075.00
10/08/2025	Stone, Chase A.	B210	Teleconf. w/ D. LoBuglio, B. Moldo, client re Petco; accounting/balance.	1.1	\$650.00	\$715.00
10/08/2025	Stone, Chase A.	B120	Review order re stipulation (request/POS); provide instructions to A. Antonio to serve on Panthers Capital LLC in order to obtain cash.	0.2	\$650.00	\$130.00
10/08/2025	Stone, Chase A.	B230	Outline terms/edits for cash collateral/critical vendor order; circulate to D. LoBuglio; confirm service list.	0.3	\$650.00	\$195.00
10/08/2025	Allen, Dylan	B230	Emergency motion to pay critical vendors and order drafting	1.0	\$535.00	\$535.00
10/09/2025	Gabai, Danielle R.	B160	Further prepare employment application to employ CPA and review LBR re service of same.	1.3	\$550.00	\$715.00
10/09/2025	Moldo, Byron Z.	B230	Prepare motion for use of cash collateral	1.4	\$1,075.00	\$1,505.00
10/09/2025	Moldo, Byron Z.	B160	Prepare application to employ ECJ; proposed order	1.0	\$1,075.00	\$1,075.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/09/2025	Stone, Chase A.	B230	Draft cash collateral motion and proposed order; build 13-week budget and reduced notice provisions; incorporate lender consent language; circulate to team.	2.8	\$650.00	\$1,820.00
10/09/2025	Stone, Chase A.	B230	Draft critical vendors emergency motion and budget schedule; necessity showing; coordinate with emergency funding list.	1.1	\$650.00	\$715.00
10/09/2025	Stone, Chase A.	B210	Draft utilities motion (adequate assurance) and reduced notice papers; prepare notice captions and hearing settings.	0.7	\$650.00	\$455.00
10/09/2025	Stone, Chase A.	B230	Prepetition wages analysis and motion; calculate pro rata wages within statutory caps; align with cash forecast.	0.4	\$650.00	\$260.00
10/09/2025	Stone, Chase A.	B230	Lender consent outreach (Newtek, Woodmere, Settle): transmit budget/order; confirm consent positions; note edits.	0.3	\$650.00	\$195.00
10/09/2025	Stone, Chase A.	B230	Review/approve emergency first day motions service list; coordinate overnight mail and service logistics with staff.	0.2	\$650.00	\$130.00
10/09/2025	Stone, Chase A.	B170	Review/edit ECJ employment application; confirm disclosures and proposed order language with D. Gabai.	0.2	\$650.00	\$130.00
10/09/2025	Stone, Chase A.	B160	Review tax accountant employment application draft; align scope/comp and Rule 2014 disclosures.	0.1	\$650.00	\$65.00
10/09/2025	Stone, Chase A.	B230	Budget iterations and urgent payments coordination; reconcile "DB Logistics" removal and emergency payments with critical vendors schedule.	0.3	\$650.00	\$195.00
10/10/2025	Gabai, Danielle R.	B230	Review and revise emergency motions re cash collateral, compile exhibits and prepare proposed orders re same.	0.9	\$550.00	\$495.00
10/10/2025	Gabai, Danielle R.	B230	Review and revise emergency motion re critical vendors, compile exhibits, prepare proposed order re same.	1.1	\$550.00	\$605.00
10/10/2025	Gabai, Danielle R.	B230	Review and revise emergency motion re prepetition wages, compile exhibits, prepare proposed order re same.	1.1	\$550.00	\$605.00
10/10/2025	Gabai, Danielle R.	B210	Review and revise emergency motion re adequate assurance, compile exhibits, prepare proposed order re same.	1.2	\$550.00	\$660.00
10/10/2025	Gabai, Danielle R.	B110	Review and revise emergency motion re limitation of notice, prepare exhibits thereto, prepare proposed order re same.	1.2	\$550.00	\$660.00
10/10/2025	Gabai, Danielle R.	B110	Review and revise emergency motion re exceeding 35-page limit, and prepare proposed order re same.	0.8	\$550.00	\$440.00
10/10/2025	Gabai, Danielle R.	B230	Review and revise omnibus declaration in support of emergency motions and compile exhibits thereto.	0.7	\$550.00	\$385.00
10/10/2025	Gabai, Danielle R.	B230	Oversee filing of emergency motions.	0.6	\$550.00	\$330.00
10/10/2025	Allen, Dylan	B230	Prepared first day motions	1.5	\$535.00	\$802.50
10/10/2025	Moldo, Byron Z.	B160	Prepare application to employ LoBuglio as accountant	0.5	\$1,075.00	\$537.50
10/10/2025	Moldo, Byron Z.	B230	Review Panthers non-consent to use of cash collateral	0.2	\$1,075.00	\$215.00
10/10/2025	Moldo, Byron Z.	B110	Prepare motions to limit notice and file lengthy brief; orders	1.0	\$1,075.00	\$1,075.00
10/10/2025	Moldo, Byron Z.	B230	Prepare motion to pay critical vendors	1.0	\$1,075.00	\$1,075.00
10/10/2025	Moldo, Byron Z.	B230	Prepare motion to pay prepetition wages	1.0	\$1,075.00	\$1,075.00
10/10/2025	Moldo, Byron Z.	B120	Prepare letter to Cappello re possible claims	0.2	\$1,075.00	\$215.00
10/10/2025	Moldo, Byron Z.	B120	Prepare letter to Cappello re claims of debtor	0.2	\$1,075.00	\$215.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/10/2025	Stone, Chase A.	B230	Draft/finalize cash collateral motion and proposed interim order; finalize 13-week budget; add Panthers non-consent language; coordinate notice/hearing date.	2.3	\$650.00	\$1,495.00
10/10/2025	Stone, Chase A.	B110	Draft limiting notice motion and 35-page excess memorandum; align notice procedures and captions.	0.9	\$650.00	\$585.00
10/10/2025	Stone, Chase A.	B210	Draft utilities motion (adequate assurance), coordinate initial utility list and deposits.	0.7	\$650.00	\$455.00
10/10/2025	Stone, Chase A.	B230	Draft prepetition priority wages motion; verify caps and payroll data; finalize exhibit of employees/amounts	0.6	\$650.00	\$390.00
10/10/2025	Stone, Chase A.	B230	Filing/ECF logistics: review service list; coordinate large overnight mailing and service; verify ECF confirmations; address Statement/Declaration docketing.	0.4	\$650.00	\$260.00
10/10/2025	Stone, Chase A.	B230	Lender consent outreach and follow-up (Newtek/Woodmere/Panthers): transmit budget/order; negotiate/record positions; update team.	0.3	\$650.00	\$195.00
10/10/2025	Stone, Chase A.	B160	Review/edit ECJ and tax accountant employment papers; confirm Rule 2014 disclosures and proposed orders.	0.2	\$650.00	\$130.00
10/10/2025	Stone, Chase A.	B230	Budget/payment triage with client (removed DB Logistics; align emergency payments with critical vendor list).	0.1	\$650.00	\$65.00
10/13/2025	Gabai, Danielle R.	B160	Finalize employment applications re ECJ and Dominic LoBuglio.	0.6	\$550.00	\$330.00
10/13/2025	Moldo, Byron Z.	B240	Review LoBuglio letter and respond re 2024 tax return	0.2	\$1,075.00	\$215.00
10/13/2025	Moldo, Byron Z.	B240	Review client letter and respond re BPM and preparation of tax returns	0.2	\$1,075.00	\$215.00
10/13/2025	Moldo, Byron Z.	B120	Review documents re relationship with various entities	0.3	\$1,075.00	\$322.50
10/13/2025	Stone, Chase A.	B230	Review correspondence from V. Samarasinghe re CIS invoices; set up call w/ B. Chia from Settle re cash collateral.	0.1	\$650.00	\$65.00
10/13/2025	Moldo, Byron Z.	B230	Telephone call to LoBuglio re financing issues, assets, tax issues	0.5	\$1,075.00	\$537.50
10/13/2025	Moldo, Byron Z.	B150	Telephone call from Altman re debt to DB Group and review supporting documents	0.3	\$1,075.00	\$322.50
10/13/2025	Stone, Chase A.	B230	Email/respond to Settle bankruptcy counsel re hearing/next steps.	0.2	\$650.00	\$130.00
10/13/2025	Stone, Chase A.	B240	Teleconf. w/ D. LoBuglio re assessment of tax issues; discussion of next steps re payment of obligations.	0.6	\$650.00	\$390.00
10/13/2025	Stone, Chase A.	B230	Teleconf. w/ S. Samarasinghe; teleconf. w/ banker re WI; review outcome of events re cash collateral; email re analysis of approach to settle cash collateral issues.	1.6	\$650.00	\$1,040.00
10/14/2025	Gabai, Danielle R.	B160	Correspond with Chase Stone re application to employ CPA.	0.2	\$550.00	\$110.00
10/14/2025	Moldo, Byron Z.	B150	Review correspondence re DB Group America re good in transit	0.2	\$1,075.00	\$215.00
10/14/2025	Moldo, Byron Z.	B120	Review various documents re tax return and related entities	0.4	\$1,075.00	\$430.00
10/14/2025	Moldo, Byron Z.	B120	Telephone call to LoBuglio re estate assets	0.6	\$1,075.00	\$645.00
10/14/2025	Stone, Chase A.	B230	Review email instructions from S. Fortier re notice; review/draft/revise notice of emergency hearings; email to and from chambers re status of notice/public instructions; teleconf. w/ S. Samarasinghe re POS/email address/contact information; forward/organize POS w/ A. Antonio and D. Perez.	1.5	\$650.00	\$975.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/14/2025	Stone, Chase A.	B150	Teleconf./follow-up w/ Settle re cash collateral.	0.5	\$650.00	\$325.00
10/14/2025	Stone, Chase A.	B150	Email to R. Altman re DB critical vendors motion.	0.1	\$650.00	\$65.00
10/14/2025	Moldo, Byron Z.	B240	Discussions re preparation of 2024 tax return	1.2	\$1,075.00	\$1,290.00
10/14/2025	Moldo, Byron Z.	B230	Telephone call to Hatch, Bohlender re possible DIP financing	0.5	\$1,075.00	\$537.50
10/14/2025	Stone, Chase A.	B230	Email to R. Soref re Panthers Capital; follow-up re BPM.	0.2	\$650.00	\$130.00
10/14/2025	Stone, Chase A.	B230	Teleconf. w/ R. Soref re Panthers.	0.3	\$650.00	\$195.00
10/14/2025	Stone, Chase A.	B110	Review CM/ECF notices and conform caption/notice after filings; verify hearing set entries and docket updates.	0.1	\$650.00	\$65.00
10/14/2025	Stone, Chase A.	B230	Finalize and circulate service/notice to additional creditors/contacts not already in POS; confirm fax/Email service list updates with staff.	0.1	\$650.00	\$65.00
10/14/2025	Stone, Chase A.	B150	Review/approve "Request for Emergency Consent to Use Cash Collateral" language and send to stakeholders (emails with Randy Soref/Lucas Rocklin around 12:59 PM).	0.3	\$650.00	\$195.00
10/14/2025	Stone, Chase A.	B230	Coordinate courtesy copies with Express Network/courtesy copy delivery instructions for Judge Russell (emails 9:22-9:25 AM).	0.1	\$650.00	\$65.00
10/14/2025	Stone, Chase A.	B230	Draft/revise Notice of Emergency First Day Motions per S. Fortier; coordinate with chambers re public instructions/status; review CM/ECF notices (appearance/hearing set) and conform caption/notice; finalize service list and coordinate POS with A. Antonio/D. Perez; circulate finalized notice to creditor contacts.	1.3	\$650.00	\$845.00
10/15/2025	Allen, Dylan	B110	Drafted motion and order to extend	1.0	\$535.00	\$535.00
10/15/2025	Moldo, Byron Z.	B120	Discussion with client and accountant re assets, liabilities, inter-company transactions	3.0	\$1,075.00	\$3,225.00
10/15/2025	Stone, Chase A.	B230	Conference with management (V. and S. Samarasinghe) and B. Moldo re MOR timing, payroll needs, and limited budget; review September and 9/22/25 Balance Sheet and P&L reports and related emails; outline action items and follow up with team on schedules/extension filing.	0.9	\$650.00	\$585.00
10/15/2025	Stone, Chase A.	B110	Teleconf. re meeting with V. Samarasinghe (MOR request for extension, review schedules, etc.).	0.2	\$650.00	\$130.00
10/15/2025	Stone, Chase A.	B230	Email/request for postpetition payroll amount.	0.1	\$650.00	\$65.00
10/15/2025	Stone, Chase A.	B110	Prepare/review/revise proposed order and motion re second request for extension to deadline to file schedules.	0.6	\$650.00	\$390.00
10/15/2025	Moldo, Byron Z.	B110	Prepare 2nd ex parte application to extend time to submit schedules	0.2	\$1,075.00	\$215.00
10/15/2025	Stone, Chase A.	B230	Review postpetition wage request; draft email to Settle and Panthers; send to B. Moldo for review.	0.2	\$650.00	\$130.00
10/15/2025	Stone, Chase A.	B230	Review/analyze discuss next steps re cash collateral.	0.1	\$650.00	\$65.00
10/15/2025	Stone, Chase A.	B230	Pre-meeting preparation; review September and 9/22/25 Balance Sheet and P&L and "Limited Budget" correspondence; outline MOR/schedules status and payroll questions (for 10 a.m. CIS call).	0.4	\$650.00	\$260.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/15/2025	Stone, Chase A.	B230	Review payroll figures from V. Samarasinghe; draft and circulate limited cash collateral/priority wages request and outreach to Panthers/UST; coordinate with second extension filing.	0.3	\$650.00	\$195.00
10/15/2025	Stone, Chase A.	B230	Call with UST re objection and MOR deadline/status and extension; confirm filing plan and information requirements.	0.2	\$650.00	\$130.00
10/16/2025	Moldo, Byron Z.	B230	Negotiations with secured creditors re use of cash collateral	1.2	\$1,075.00	\$1,290.00
10/16/2025	Stone, Chase A.	B230	Teleconf. w/ S. Samarasinghe; forward Panthers' response re use of cash collateral to Settle and request further response; review Z. Bohlender email re next steps.	0.6	\$650.00	\$390.00
10/16/2025	Stone, Chase A.	B110	Review NEF notices re appearance and courtesy NEF; confirm service matrix and file/route to team; note MOR deadline in task list.	0.2	\$650.00	\$130.00
10/16/2025	Stone, Chase A.	B230	Draft/refine cash-collateral limited wages request and circulate follow-ups; coordinate responses and next-step assignments.	0.2	\$650.00	\$130.00
10/16/2025	Stone, Chase A.	B110	Review/respond to "Request for Second Extension" and payroll/cash collateral emails; confirm next-step assignments.	0.1	\$650.00	\$65.00
10/16/2025	Stone, Chase A.	B230	Draft and circulate follow-up on limited cash-collateral use for priority wages; coordinate with management and counsel on proposed terms; track counterparty response and next steps.	0.2	\$650.00	\$130.00
10/16/2025	Stone, Chase A.	B150	Send follow-up re limited use of cash collateral for priority wages; confirm counterparty receipt and next step timing.	0.2	\$650.00	\$130.00
10/17/2025	Stone, Chase A.	B160	Review email from L. Vesely re employment application materials; respond re same w/ statement of disinterestedness.	0.2	\$650.00	\$130.00
10/17/2025	Moldo, Byron Z.	B120	Discussions re claims against Panthers	0.6	\$1,075.00	\$645.00
10/17/2025	Moldo, Byron Z.	B230	Review UST opposition to critical vendor motion and request for continuance	0.2	\$1,075.00	\$215.00
10/17/2025	Moldo, Byron Z.	B230	Review Settle limited objection to use of cash collateral	0.1	\$1,075.00	\$107.50
10/17/2025	Moldo, Byron Z.	B210	Review Panthers opposition to critical vendor motion	0.2	\$1,075.00	\$215.00
10/17/2025	Moldo, Byron Z.	B120	Telephone call from LoBuglio re T3 Aquatics and related entities	0.3	\$1,075.00	\$322.50
10/17/2025	Moldo, Byron Z.	B230	Review and analyze opposition to emergency motions	1.2	\$1,075.00	\$1,290.00
10/17/2025	Stone, Chase A.	B230	Review and analyze objection and supporting declaration regarding limited use of cash collateral/critical vendor relief; outline response strategy and evidentiary needs; coordinate with team on draft assignments and timing.	0.7	\$650.00	\$455.00
10/17/2025	Stone, Chase A.	B160	Coordinate accountant's employment application materials; prepare/confirm disinterestedness and connections disclosures; correspond with D. LoBuglio, L. Vesely, and team regarding required exhibits and next filing steps.	0.3	\$650.00	\$195.00
10/17/2025	Stone, Chase A.	B230	Review and analyze objection affecting use of cash collateral/critical vendor relief; outline response strategy and evidentiary needs; circulate summary and coordinate next steps.	0.3	\$650.00	\$195.00
10/17/2025	Stone, Chase A.	B230	Substantive review and analysis of opposition and declarations regarding cash collateral/critical vendor relief; develop response strategy, identify evidentiary gaps, and assign drafting tasks; confer with counsel and client; prepare summary to team.	1.7	\$650.00	\$1,105.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/17/2025	Stone, Chase A.	B110	Process CM/ECF notices; update docket and case file; calendar briefing/hearing deadlines; route filings and instructions to D. Perez/A. Antonio.	0.3	\$650.00	\$195.00
10/17/2025	Stone, Chase A.	B230	Teleconference re employment application and DIP account status; confirm disinterestedness materials, connections list, and next filing steps.	0.3	\$650.00	\$195.00
10/20/2025	Slater, Jared	B160	Meeting with C. Stone regarding background of case and employment application assignment	0.3	\$655.00	\$196.50
10/20/2025	Gabai, Danielle R.	B230	Review and revise Debtor's omnibus reply re oppositions to emergency motions.	0.4	\$550.00	\$220.00
10/20/2025	Moldo, Byron Z.	B210	Telephone call from client re payments to related entities	0.2	\$1,075.00	\$215.00
10/20/2025	Moldo, Byron Z.	B230	Prepare reply to opposition to motion to use cash collateral and pay critical vendors	1.0	\$1,075.00	\$1,075.00
10/20/2025	Moldo, Byron Z.	B120	Telephone call to LoBuglio re balance sheet and other financial issues	0.4	\$1,075.00	\$430.00
10/20/2025	Moldo, Byron Z.	B210	Review So Cal Gas objection to motion re utilities	0.2	\$1,075.00	\$215.00
10/20/2025	Stone, Chase A.	B230	Review UST objection; review Panther opposition/objection re prepetition vendors/cash collateral; review SoCalGas; review budget and conf. w/ S. Samarasinghe; review timing re 2:00 p.m. deadline; instruct D. Perez/A. Antonio to prepare for filing that afternoon.	3.2	\$650.00	\$2,080.00
10/20/2025	Stone, Chase A.	B230	Prepare omnibus reply to UST; Settle; Panther; and SoCalGas; draft reply; draft declaration; teleconf. w/ S. Samarasinghe.	1.3	\$650.00	\$845.00
10/20/2025	Stone, Chase A.	B110	Review Debtor's tax returns (2023, 2022), prior balance sheet, revised balance sheet, and P&L statements; analyze financial data for Schedule A/B preparation.	0.8	\$650.00	\$520.00
10/20/2025	Stone, Chase A.	B110	Obtain and review copies of Debtor's licensing documentation and depreciation/amortization schedules.	0.3	\$650.00	\$195.00
10/20/2025	Stone, Chase A.	B110	Teleconference with C. Samarasinghe and V. Samarasinghe regarding financial disclosures and schedules; discuss outstanding information needs.	0.5	\$650.00	\$325.00
10/20/2025	Stone, Chase A.	B110	Prepare and draft Schedule A/B based on review of financial documents, tax returns, and balance sheets; coordinate asset classifications and valuations.	1.3	\$650.00	\$845.00
10/20/2025	Stone, Chase A.	B230	Revise critical vendors motion; incorporate financial data and adjustments based on client discussions.	0.9	\$650.00	\$585.00
10/20/2025	Stone, Chase A.	B110	Finalize and approve e-file Schedule A/B; prepare email correspondence regarding hearing preparation for morning proceedings; confirm filing and next steps.	0.9	\$650.00	\$585.00
10/21/2025	Slater, Jared	B160	Review response from BPM LLP regarding employment application information	0.2	\$655.00	\$131.00
10/21/2025	Slater, Jared	B160	Prepare Notice of Application and Application of Debtor and Debtor-In-Possession For Authority to Employ BPM LLP As Special Accountant for the Estate and Statement of Disinterest	1.4	\$655.00	\$917.00
10/21/2025	Slater, Jared	B160	E-mail to BPM LLP requesting information to prepare employment application on company's behalf	0.4	\$655.00	\$262.00
10/21/2025	Slater, Jared	B160	E-mail to Brightpoint Law requesting information to prepare employment application on company's behalf	0.3	\$655.00	\$196.50
10/21/2025	Moldo, Byron Z.	B210	Review LoBuglio letter and financial information re operations	0.3	\$1,075.00	\$322.50

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/21/2025	Moldo, Byron Z.	B210	Telephone call to client re court ruling and continued operations	0.5	\$1,075.00	\$537.50
10/21/2025	Stone, Chase A.	B230	Prepare for hearing on emergency motions; organize exhibits and supporting documents; compile materials for court binders.	1.2	\$650.00	\$780.00
10/21/2025	Stone, Chase A.	B410	Conf. w/ S. Samarasinghe re following hearing next steps; teleconf. w/ DIP financier; teleconf. w/ B. Moldo; teleconf. w/ Z. Bohlender; review additional information from S. Samarasinghe re next steps/Ch. 7.	2.1	\$650.00	\$1,365.00
10/21/2025	Moldo, Byron Z.	B210	Review proposed orders denying emergency motions	0.2	\$1,075.00	\$215.00
10/21/2025	Stone, Chase A.	B230	Teleconf. w/ Z. Bohlender; email/correspondence w/ S. Samarasinghe re DIP financing; review prior email/correspondence re same.	0.8	\$650.00	\$520.00
10/21/2025	Stone, Chase A.	B230	Print and assemble court binders for emergency motions hearing; prepare copies for review with client.	0.8	\$650.00	\$520.00
10/21/2025	Stone, Chase A.	B230	Appear at hearing before Judge Russell on emergency motions; present argument; respond to court's questions; confer with client and opposing counsel.	2.4	\$650.00	\$1,560.00
10/21/2025	Stone, Chase A.	B410	Post-hearing teleconf. with S. Samarasinghe regarding anticipated issues for next steps re conversion to chapter 7.	0.5	\$650.00	\$325.00
10/21/2025	Stone, Chase A.	B230	Review/teleconf. w/ team re strategy and legal advice to CIS; discussion w/ S. Samarasinghe re funding; teleconf. w/ Altbank; schedule/call w/ Settle counsel.	0.9	\$650.00	\$585.00
10/22/2025	Slater, Jared	B160	Meeting with C. Stone to discuss employment application for BPM	0.3	\$655.00	\$196.50
10/22/2025	Slater, Jared	B160	Revise employment application for BPM	0.3	\$655.00	\$196.50
10/22/2025	Slater, Jared	B160	E-mails to and review responses from BPM regarding draft employment application	0.2	\$655.00	\$131.00
10/22/2025	Moldo, Byron Z.	B210	Conference Olson re court hearing and possible continued operations	1.0	\$1,075.00	\$1,075.00
10/22/2025	Moldo, Byron Z.	B150	Prepare letter to Amin re Newtek Bank	0.2	\$1,075.00	\$215.00
10/22/2025	Moldo, Byron Z.	B120	Telephone call to Cappello, Bohlender, Luccarelli re claims against Panthers	0.4	\$1,075.00	\$430.00
10/22/2025	Moldo, Byron Z.	B210	Negotiations with client and secured creditors re continued operations	1.5	\$1,075.00	\$1,612.50
10/22/2025	Stone, Chase A.	B150	Teleconference with S. Olson regarding CIS posture, next steps/considerations, and coordination with Polsinelli/Z. Bohlender; define action items and timelines.	0.5	\$650.00	\$325.00
10/22/2025	Stone, Chase A.	B110	Review and analyze bankruptcy court notices and orders; confirm status and next steps; circulate to client; teleconf. w/ S. Samarasinghe.	0.8	\$650.00	\$520.00
10/22/2025	Stone, Chase A.	B110	Prepare and send status updates on CIS re client inquiry; coordinate scheduling with team for follow-up discussions re Polsenelli/Z. Bohlender.	0.5	\$650.00	\$325.00
10/22/2025	Stone, Chase A.	B150	Review Newtek UCC correspondence; assess implications for CIS matter; respond with requested information and next steps.	0.4	\$650.00	\$260.00
10/22/2025	Stone, Chase A.	B420	Email correspondence with co-counsel and client team re CIS strategy; DFPI issues; Altbank/Settle follow up; compile and forward background materials; outline next steps/items.	0.6	\$650.00	\$390.00
10/22/2025	Stone, Chase A.	B160	Meeting with J. Slater re employment/retention applications in CIS (scope, disclosures, proposed terms, filing timeline); outline/drafting and required exhibits.	0.5	\$650.00	\$325.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/22/2025	Stone, Chase A.	B150	Email/correspondence and analysis of Panthers priority in context of Settle UCC; discussion w/ S. Samarasinghe re next steps; teleconf. w/ S. Samarasinghe.	0.7	\$650.00	\$455.00
10/23/2025	Moldo, Byron Z.	B120	Telephone call from Goodrich re case status	0.5	\$1,075.00	\$537.50
10/23/2025	Moldo, Byron Z.	B150	Telephone call to Amin, Stark re Newtek loan	0.5	\$1,075.00	\$537.50
10/23/2025	Stone, Chase A.	B420	Teleconf./email w/ Z. Bohlender re Settle and forwarding/communication w/ Seyfarth and Altbank to facilitate possible assignment; teleconf. re same.	0.6	\$650.00	\$390.00
10/23/2025	Stone, Chase A.	B420	Email/correspondence re Z. Bohlender, Panther timeline; circulate notice of Lodgment re conversion to Chapter 7; reivwe/coordinate correspondence and answer questions re S. Samarsinghe.	1.4	\$650.00	\$910.00
10/23/2025	Stone, Chase A.	B420	Review inquiries re D. Goodrich and next steps; setup call/email/correspondence w/ D. Goodrich and S. Samarasinghe.	0.6	\$650.00	\$390.00
10/24/2025	Slater, Jared	B160	E-mail to Z. Bohlender regarding Brightpoint law employment application	0.1	\$655.00	\$65.50
10/24/2025	Stone, Chase A.	B110	Review/respond to email from CT counsel re Chapter 7 appointment.	0.2	\$650.00	\$130.00
10/24/2025	Stone, Chase A.	B120	Review UCC recordation dates; review lien stack summary re Z. Bohlender; draft/summarize email to D. Goodrich re cash collateral.	0.9	\$650.00	\$585.00
10/24/2025	Stone, Chase A.	B190	Review/analyze email from P. Luccarelli re CT case.	0.1	\$650.00	\$65.00
10/24/2025	Stone, Chase A.	B420	Compile documentation for Chapter 7 trustee D. Goodrich; organize and prepare; review add'l information re UCC filings, and related entity documentation; send materials to trustee (L. Robles).	0.6	\$650.00	\$390.00
10/24/2025	Stone, Chase A.	B420	Additional legal analysis re related litigation (as to automatic stay over non-debtors/individual principals); procedural options/veil piercing; strategic implications.	0.5	\$650.00	\$325.00
10/27/2025	Stone, Chase A.	B420	Teleconf./emails w/ D. Goodrich re information/summary and provide additional updates at request of S. Samarasinghe.	0.6	\$650.00	\$390.00
10/27/2025	Stone, Chase A.	B110	Respond to inquiries re S. Samarasinghe Ch. 7.	0.2	\$650.00	\$130.00
10/27/2025	Stone, Chase A.	B420	Teleconf. w/ D. Goodrich, S. Samarsinghe re next steps and answer inquiries re same.	0.5	\$650.00	\$325.00
10/27/2025	Stone, Chase A.	B240	Email/forward inquiry from S. Montgomery re EDD to D. Goodrich; respond re same.	0.2	\$650.00	\$130.00
10/27/2025	Stone, Chase A.	B420	Review and analyze Chapter 7 bankruptcy filing for CIS; prepare extensive summary and documentation for J. Wyche; follow-up/coordinate with B. Kowieski.	0.4	\$650.00	\$260.00
10/27/2025	Stone, Chase A.	B420	Address AltBanc financing issues; correspondence with Z. Bohlender regarding banking matters and alternative financing options; draft/send email and further responses to trustee inquiries.	0.3	\$650.00	\$195.00
10/29/2025	Slater, Jared	B160	E-mail to BPM to follow up on CV request	0.1	\$655.00	\$65.50
10/29/2025	Stone, Chase A.	B420	Teleconf. w/ Z. Bohlender re Ch. 7 trustee; structuring newco; Settle/Altbank discussions, etc.	1.1	\$650.00	\$715.00
10/30/2025	Stone, Chase A.	B110	Email to Banc of Commerce; review email from Z. Bohlender re updates (cash); review/respond to inquiry from S. Samarasinghe re container.	0.3	\$650.00	\$195.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/30/2025	Stone, Chase A.	B420	Review/analyze progress updates/extensive communication w/ S. Samarsinghe and Z. Bohlender; follow-up correspondence to J. Wyche; discussion re asset sales v. disposition to Lionsrock and possible scenarios/outcomes.	0.6	\$650.00	\$390.00
10/30/2025	Stone, Chase A.	B130	Teleconf. w/ S. Samarsinghe re DB containers; additional issue re D. Goodrich.	0.2	\$650.00	\$130.00
10/31/2025	Stone, Chase A.	B120	Teleconf. w/ Commerce Bank re CIS bank accounts; review email from Z. Bohlender; forward info to J. Wyche re same.	0.6	\$650.00	\$390.00
10/31/2025	Stone, Chase A.	B420	Teleconf. w/ Z. Bohlender; next steps; forward inquiry at request of CIS to D. Goodrich re same; email to J. Wyche re same.	0.5	\$650.00	\$325.00
10/31/2025	Stone, Chase A.	B420	Review information and summary of Letter of Intent to Trustee; correspondence with Z. Bohlender.	0.3	\$650.00	\$195.00
10/31/2025	Stone, Chase A.	B420	Further email/correspondence and extensive coordination w/ S. Samarsinghe and Z. Bohlender w/ D. Goodrich re update (notice to abandon); follow-up teleconf/ w. S. Samarsinghe re same and discussion/analysis of next steps.	0.6	\$650.00	\$390.00
11/02/2025	Stone, Chase A.	B420	Review/email from Z. Bohlender re motion to abandon; forward to B. Moldo.	0.2	\$650.00	\$130.00
11/03/2025	Moldo, Byron Z.	B130	Review NewTek limited opposition to trustee motion to abandon	0.1	\$1,075.00	\$107.50
11/03/2025	Stone, Chase A.	B150	Confer with D. Goodrich new CIS issues; analyze questions and provide recommendations; circulate follow up	0.5	\$650.00	\$325.00
11/03/2025	Stone, Chase A.	B130	Review/forward joinder filed by Panthers to NewTek opposition to abandonment.	0.2	\$650.00	\$130.00
11/04/2025	Stone, Chase A.	B110	Teleconf. w/ S. Samarsinghe; review/forward order to continue hearing; send email to D. Goodrich; provide further instruction/email to S. Samarsinghe/V. Samarsinghe; send ACH instructions to D. Goodrich.	0.9	\$650.00	\$585.00
11/05/2025	Stone, Chase A.	B120	Review email re V. Samarsinghe (pending AR from Petco); prepare subsequent response re clarification; note for further inquiry to D. Goodrich.	0.3	\$650.00	\$195.00
11/06/2025	Stone, Chase A.	B130	Review/send documents to Z. Bohlender re Panthers objection; review email/follow-up request for information from S. Samarsinghe.	0.3	\$650.00	\$195.00
11/07/2025	Stone, Chase A.	B130	Draft correspondence to V. Samarsinghe and S. Samarsinghe re notice of continued hearing on motion to abandon; review motion to abandon; review add'l issues re Wisconsin and Live Aquaria acquisitions.	1.2	\$650.00	\$780.00
11/10/2025	Stone, Chase A.	B150	Review/forward email to D. Goodrich re creditor inquiry.	0.2	\$650.00	\$130.00
11/10/2025	Stone, Chase A.	B110	Review status report prepared by D. Goodrich; review email from H. Basri re claim (Director of CV Sematik Perkasa); review subsequent inquiry from D. LoBuglio.	0.4	\$650.00	\$260.00
11/11/2025	Stone, Chase A.	B110	Review/reply to S. Samarsinghe; email to D. Goodrich re status report.	0.2	\$650.00	\$130.00
11/11/2025	Stone, Chase A.	B160	Prepare fee application through Oct. 22; review LBRs; prepare declaration re same; send email/analysis to B. Moldo.	0.8	\$650.00	\$520.00
11/11/2025	Stone, Chase A.	B150	Teleconf. w/ A. Fletcher; review documents; send request/email to A. Antonio and D. Perez; review prior communications re settlement agreement; update re B. Moldo; send analysis to A. Fletcher.	1.1	\$650.00	\$715.00
11/11/2025	Stone, Chase A.	B160	Review iManage documents re employment applications; access PACER/CM/ECF for case filings; research declaration re non-opposition procedures and forms.	0.5	\$650.00	\$325.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
11/11/2025	Stone, Chase A.	B110	Forward 341(a) meeting info to S. Samarasinghe and review B. Moldo emails re CIS/DFPI. Confirm declaration re non-opposition procedures and access PACER for case filings.	0.3	\$650.00	\$195.00
11/12/2025	Stone, Chase A.	B110	Review/email/correspondence w/ S. Samarasinghe re scheduling.	0.2	\$650.00	\$130.00
11/12/2025	Stone, Chase A.	B130	Teleconf. re status of abandonment; review email/follow-up from D. Goodrich; provide further analysis/send email to D. Goodrich re response; forward additional info to S. Samarasinghe; respond to V. Samarasinghe inquiry re same.	1.9	\$650.00	\$1,235.00
11/12/2025	Stone, Chase A.	B120	Review/respond to inquiries re D. Goodrich; review add'l email correspondence from S. Samarasinghe; forward add'l documentation; review additional invoices from Petco.	1.2	\$650.00	\$780.00
11/13/2025	Stone, Chase A.	B120	Review/send docs to D. Goodrich; provide further information; teleconf. re B. Moldo; review Panthers A/R statements.	1.1	\$650.00	\$715.00
11/13/2025	Stone, Chase A.	B120	Cont. re request providing/send further correspondence to D. Goodrich; review/analyze; teleconf re same; further analysis re asset schedule; follow-up email to P. Luccarelli re status of stay.	1.8	\$650.00	\$1,170.00
11/13/2025	Stone, Chase A.	B150	Email correspondence to I. Amin and C. Stark re NewTek.	0.2	\$650.00	\$130.00
11/14/2025	Stone, Chase A.	B140	Review court filings re transcript/notice of deficiency; correspondence with D. Goodrich; email to P. Luccarelli re extending bankruptcy stay to related entities; forward materials re next steps.	0.5	\$650.00	\$325.00
11/14/2025	Stone, Chase A.	B150	Review/respond to emails from P. Luccarelli re bankruptcy stay.	0.2	\$650.00	\$130.00
11/16/2025	Stone, Chase A.	B150	Review email from B. Kowiecki; save/note for further updates/follow-up re abandonment.	0.2	\$650.00	\$130.00
11/17/2025	Moldo, Byron Z.	B120	Review documents re Wisconsin property	0.3	\$1,075.00	\$322.50
11/17/2025	Moldo, Byron Z.	B120	Conference Goodrich, client re real property transactions	0.5	\$1,075.00	\$537.50
11/17/2025	Stone, Chase A.	B110	Review email from V. Samarsinghe re employee backpay; forward to B. Moldo re inquiry.	0.2	\$650.00	\$130.00
11/17/2025	Stone, Chase A.	B150	Email/respond to V. Samarsinghe re 341(a).	0.2	\$650.00	\$130.00
11/17/2025	Stone, Chase A.	B150	Send/draft follow-up email for 341(a) meeting; review prior notes from 341(a) w/ UST.	0.3	\$650.00	\$195.00
11/17/2025	Stone, Chase A.	B110	Prepare/finalize form 1019.	1.3	\$650.00	\$845.00
11/17/2025	Stone, Chase A.	B110	Teleconf. w/ B. Moldo; prepare Form 9019; organize/review documents for 341(a) meeting of creditors.	0.5	\$650.00	\$325.00
11/17/2025	Stone, Chase A.	B110	Teleconf. w/ S. Samarasinghe; review documents; send email to D. Goodrich to confirm; send email to B. Moldo re same.	1.2	\$650.00	\$780.00
11/17/2025	Stone, Chase A.	B150	Teleconf. w/ D. Goodrich re preparation of 341(a).	0.5	\$650.00	\$325.00
11/17/2025	Stone, Chase A.	B110	Email/send documents re D. Goodrich; provide add'l analysis.	0.3	\$650.00	\$195.00
11/17/2025	Stone, Chase A.	B110	Further email/review correspondence and forward documents to D. Goodrich re same.	0.2	\$650.00	\$130.00
11/18/2025	Stone, Chase A.	B150	Review 341(a) email/update from D. Goodrich; review DIP account statement from V. Samarasinghe; forward to D. Goodrich.	0.4	\$650.00	\$260.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
11/18/2025	Stone, Chase A.	B110	Continue preparation Form 1019; email/forward attachments to D. Goodrich re closing statements; inquire re S. Samarasinghe re same.	1.2	\$650.00	\$780.00
11/18/2025	Stone, Chase A.	B110	Review/finalize Form 1019; forward request to D. Goodrich re account statements.	0.5	\$650.00	\$325.00
11/18/2025	Stone, Chase A.	B110	Email/review revise CIS and send email to D. Goodrich; request Docusign from V. Samarasinghe and S. Samarasinghe.	0.2	\$650.00	\$130.00
11/19/2025	Stone, Chase A.	B150	Email/review preparation for 341(a); summarize list of items/follow-up w/ S. Samarasinghe; teleconf. re same.	0.3	\$650.00	\$195.00
11/19/2025	Stone, Chase A.	B150	Teleconf. w/ S. Samarsinghe.	0.7	\$650.00	\$455.00
11/19/2025	Stone, Chase A.	B150	341(a)	2.2	\$650.00	\$1,430.00
11/19/2025	Stone, Chase A.	B150	Review list of notes; prepare/itemize list of documents to send to D. Goodrich.	0.3	\$650.00	\$195.00
11/20/2025	Stone, Chase A.	B150	Review notes from 341(a); set up hearing folder re uploading files for V. Samarasinghe and S. Samarasinghe; email to D. Goodrich re articles; teleconf. w/ B. Moldo re same; follow up re employee request/letter issue.	0.9	\$650.00	\$585.00
11/20/2025	Stone, Chase A.	B150	Teleconf. w/ counsel for SBA re priority; forward inquiry to S. Samarsinghe.	0.6	\$650.00	\$390.00
11/21/2025	Allen, Dylan	B160	Reviewed the file re preparing the fee app	0.7	\$535.00	\$374.50
11/21/2025	Stone, Chase A.	B190	Teleconf. w/ P. Lucarelli; follow-up email to D. Goodrich re Ct litigation; analyze legal authorities in aid of jurisdiction analysis.	1.2	\$650.00	\$780.00
11/22/2025	Stone, Chase A.	B190	Review correspondence from P. Luccarelli; review correspondence from A. Fletcher re same.; review response from D. Goodrich re complaint/timing of call.	0.2	\$650.00	\$130.00
11/24/2025	Stone, Chase A.	B160	Review/revise stipulation; review proposed order; lodge CIS order re employment; send documents re template to B. Moldo for review; approve/upload notice of lodgment and declaration of non opposition.	1.2	\$650.00	\$780.00
11/25/2025	Stone, Chase A.	B150	Continue drafting CIS fee application re 327 compensation; email to A. Fletcher re facts of declaration.	1.2	\$650.00	\$780.00
11/25/2025	Stone, Chase A.	B190	Review email from A. Fletcher re Panthers security interest; respond re same; prepare/draft response.	0.2	\$650.00	\$130.00
11/26/2025	Stone, Chase A.	B140	Review correspondence from P. Lucarrelli re S. Samarasinghe; review subsequent email from S. Samarasinghe	0.3	\$650.00	\$195.00
11/27/2025	Stone, Chase A.	B310	Review proof of claim re submission of Willy Hartano (twice submitted); to analyze whether erroneous/separate claims for preparation of amended schedules as of Petition Date.	0.2	\$650.00	\$130.00
12/01/2025	Stone, Chase A.	B190	Teleconf. w/ D. Goodrich and P. Lucarelli.	0.8	\$650.00	\$520.00
12/01/2025	Stone, Chase A.	B110	Review email correspondence from V. Samarsinghe; review notes re 341(a) and continue revising/review amendments to schedules.	0.5	\$650.00	\$325.00
12/02/2025	Stone, Chase A.	B160	Review docket re order of employment.	0.2	\$650.00	\$130.00
12/03/2025	Stone, Chase A.	B410	Email to CIS principal re documents and lawsuit inquiries; answer/referral to counsel re same; prepare response/send via email.	0.3	\$650.00	\$195.00
12/04/2025	Stone, Chase A.	B190	Review/respond to email to S. Samarasinghe re PG lawsuit.	0.2	\$650.00	\$130.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
12/04/2025	Stone, Chase A.	B130	Review notice of assets re D. Goodrich.	0.2	\$650.00	\$130.00
12/04/2025	Stone, Chase A.	B150	Review files uploaded by S. Samarasinghe; send response/reminder re request from D. Goodrich to share prior to 341(a); organize.	0.3	\$650.00	\$195.00
12/04/2025	Stone, Chase A.	B160	Prepare/review and draft first fee statement (Sept. 2025).	0.2	\$650.00	\$130.00
12/04/2025	Stone, Chase A.	B160	Prepare/review second fee statement (October 2025).	0.2	\$650.00	\$130.00
12/05/2025	Stone, Chase A.	B190	Review/respond to email from P. Lucarelli re removal issues/next steps.	0.3	\$650.00	\$195.00
12/05/2025	Stone, Chase A.	B190	Teleconf. w/ B. Moldo; teleconf. w/ Z. Bohlender; review email re Z. Bohlender about adversary.	0.5	\$650.00	\$325.00
12/08/2025	Stone, Chase A.	B110	Email/reply to D. Goodrich; review files from CIS debtor re same; review email and set up call re group.	0.3	\$650.00	\$195.00
12/08/2025	Stone, Chase A.	B110	Teleconf. w/ B. Moldo; email to D. Goodrich.	0.2	\$650.00	\$130.00
12/09/2025	Stone, Chase A.	B190	Email/reply to P. Lucarelli re removal.	0.2	\$650.00	\$130.00
12/09/2025	Stone, Chase A.	B110	Teleconf. w/ D. Goodrich; email to S. Samarasinghe; email to A. Antonio/D. Perez re continuance; teleconf. w/ P. Lucarelli; email to group of interested professionals.	1.6	\$650.00	\$1,040.00
12/09/2025	Stone, Chase A.	B190	Review pleading re reply to opposition re Panthers.	0.5	\$650.00	\$325.00
12/09/2025	Stone, Chase A.	B110	Teleconf. w/ P. Luccarelli; continue amendment of schedules; email to B. Moldo re status/forward; email to group re attorneys/contingency claims.	1.2	\$650.00	\$780.00
12/10/2025	Stone, Chase A.	B110	Follow-up w/ Z. Bohlender.	0.1	\$650.00	\$65.00
12/11/2025	Stone, Chase A.	B190	Review correspondence from S. Samarasinghe re personal guaranty case.	0.1	\$650.00	\$65.00
12/11/2025	Stone, Chase A.	B110	Review email from A. Antonio re documents sent from V. Samarsinghe.	0.1	\$650.00	\$65.00
12/11/2025	Stone, Chase A.	B160	Teleconf. w/ L. Ponce.	0.0	\$0.00	\$0.00
12/12/2025	Stone, Chase A.	B190	Review summons re personal guaranty lawsuit against S. Samarasinghe; send email to S. Samarasinghe re reply to lawsuit issues; review/email and follow-up; provide response re personal representation; review subsequent email from Z. Bohlender.	0.4	\$650.00	\$260.00
12/12/2025	Moldo, Byron Z.	B120	Telephone call to Bohlender, Stone re proposed action against Panthers	0.5	\$1,075.00	\$537.50
12/12/2025	Stone, Chase A.	B110	Teleconf. w/ Z. Bohlender; follow-up w/ B. Moldo.	0.8	\$650.00	\$520.00
12/16/2025	Stone, Chase A.	B190	Email/follow-up to J. Atabak re email/schedule.	0.1	\$650.00	\$65.00
12/16/2025	Stone, Chase A.	B185	Review notice of lodgment re motion to abandon lease; review notice of lodgment re denial of motion to reconsider; email to A. Fletcher re follow-up.	0.3	\$650.00	\$195.00
12/16/2025	Stone, Chase A.	B190	Review email from P. Lucarelli; review/respond to email from A. Fletcher.	0.1	\$650.00	\$65.00
12/18/2025	Stone, Chase A.	B110	Review/respond to email from D. Goodrich; forward attachments.	0.3	\$650.00	\$195.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
12/18/2025	Moldo, Byron Z.	B120	Telephone call to Atabek re claims against Panthers	0.5	\$1,075.00	\$537.50
12/18/2025	Stone, Chase A.	B190	Teleconf. w/ J. Atabek; email to V. Samarsinghe and S. Samarsinghe; follow-up w/ D. Goodrich; review motion to be relieved as counsel; review follow-up emails from P. Lucarelli and Z. Bohlender.	0.8	\$650.00	\$520.00
12/22/2025	Stone, Chase A.	B110	Email to D. Goodrich; email to S./V. Samarsinghe; teleconf. w/ B. Moldo re same.	0.5	\$650.00	\$325.00
12/23/2025	Stone, Chase A.	B140	Review/notify S. Samarsinghe re relief from stay; forward correspondence to D. Goodrich; review subsequent follow-up email from V. Samarsinghe re DIP account; review subsequent response re smae.	0.5	\$650.00	\$325.00
12/23/2025	Stone, Chase A.	B150	Draft/respond to email re payments to CIS employees explaining issues re payment from CIS and prior requests.	0.3	\$650.00	\$195.00
12/24/2025	Stone, Chase A.	B110	Review entry of two orders re NEF.	0.2	\$650.00	\$130.00
12/29/2025	Stone, Chase A.	B310	Review correspondence from B. Moldo re proof of claim.	0.1	\$650.00	\$65.00
12/30/2025	Stone, Chase A.	B310	Review email from B. Moldo re proof of claim; download proof of claim re S. Samarsinghe.	0.2	\$650.00	\$130.00
12/30/2025	Stone, Chase A.	B110	Draft/review amended schedules.	0.7	\$650.00	\$455.00
01/05/2026	Stone, Chase A.	B110	Review calendar; email to D. Goodrich; email to S. Samarsinghe; teleconf. w/ B. Moldo.	0.1	\$650.00	\$65.00
01/05/2026	Stone, Chase A.	B110	Email to D. Goodrich; email to S. Samarsinghe; review/send follow-up re same.	0.2	\$650.00	\$130.00
01/05/2026	Stone, Chase A.	B130	341(a) meeting of creditors - concluded; summarize/follow-up w/ B. Moldo re next steps; add/edit list of documents.	0.8	\$650.00	\$520.00
01/05/2026	Stone, Chase A.	B110	Review/draft/send correspondence; send further information/correspondence to S. Samarsinghe re same.	0.2	\$650.00	\$130.00
01/06/2026	Stone, Chase A.	B110	Review/respond to request from D. Goodrich re files; send follow-up email to S. Samarsinghe/V. Samarsinghe re request.	0.5	\$650.00	\$325.00
01/07/2026	Stone, Chase A.	B140	Email/response to S. Samarsinghe re lift stay.	0.2	\$650.00	\$130.00
01/12/2026	Stone, Chase A.	B110	Email to J. Atabek; email/follow-up w/ Debtor; email/follow-up to D. Goodrich.	0.2	\$650.00	\$130.00
01/13/2026	Stone, Chase A.	B130	Email to D. Goodrich; response re Izusu; send email to B. Moldo re prepetition liens.	0.3	\$650.00	\$195.00
01/14/2026	Stone, Chase A.	B310	Review communication w/ D. Goodrich re liens, further discussion w/ B. Moldo to confirm insight.	0.2	\$650.00	\$130.00
01/20/2026	Stone, Chase A.	B110	Review email from V. Samarsinghe; send to D. Goodrich re update.	0.3	\$650.00	\$195.00
01/21/2026	Stone, Chase A.	B110	Review D. Goodrich reply; send further response to V. Samarsinghe; conf. w/ B. Moldo/D.LoBuglio re same.	0.3	\$650.00	\$195.00
02/12/2026	Stone, Chase A.	B110	Email/review/respond re Chapter 7 filing.	0.1	\$650.00	\$65.00
09/08/2026	Stone, Chase A.	B110	Emails to and from B. Moldo re CIS International Holdings bankruptcy inquiry.	0.2	\$650.00	\$130.00
09/22/2026	Stone, Chase A.	B110	Teleconf. w/ S. Malmed re CIS International re fee application.	0.2	\$650.00	\$130.00
09/23/2026	Malmed, Shantal	B160	Conference with C. Stone re case and fee app.	0.1	\$545.00	\$54.50

Date	Timekeeper	Code	Description	Hours	Rate	Amount
09/23/2026	Malmed, Shantal	B160	Draft fee app.	2.1	\$545.00	\$1,144.50
09/24/2026	Malmed, Shantal	B160	Revise fee app.	0.3	\$545.00	\$163.50
09/25/2026	Malmed, Shantal	B160	Finalize fee app and correspond with C. Stone re same.	2.9	\$545.00	\$1,580.50
09/28/2026	Stone, Chase A.	B110	Emails to and from R. Williamson and S. Samarasinghe re call re engaging Newtek Bank and D. Goodrich.	0.3	\$650.00	\$195.00
09/28/2026	Stone, Chase A.	B110	Emails to and from S. Malmed re review of fee application.	0.2	\$650.00	\$130.00
09/28/2026	Malmed, Shantal	B160	Correspond with C. Stone re fee app.	0.1	\$545.00	\$54.50
09/29/2026	Stone, Chase A.	B110	Emails to and from R. Williamson re Chase / Richard request for call Re: Introducing Attorney for LionsRock - Re. CIS re Chapter 7 to Chapter 11 conversion and trustee counsel contact information for release of held funds.	0.3	\$650.00	\$195.00
09/30/2026	Stone, Chase A.	B110	Emails to and from A. Gill re CIS International / Tokyo Century Rule 2004 exam scheduling and meet and confer conference under LBR 7026-1(c).	0.2	\$650.00	\$130.00
10/02/2026	Stone, Chase A.	B110	Meet and confer w/ Angela Gill re Tokyo Century; next steps/email w/ R. Williamson to assist w/ vehicle collateral, and cooperation/location of estate assets.	0.5	\$650.00	\$325.00
10/05/2026	Stone, Chase A.	B110	Correspond w/ S. Burnell (Greenspoon Marder) and R. Williamson re CIS International, including introducing counsel for Mr. Samarsinghe to debtor's counsel and concerns of debtor's principal.	0.3	\$650.00	\$195.00
10/05/2026	Malmed, Shantal	B160	Correspond with C. Stone re fee app.	0.1	\$545.00	\$54.50
10/06/2026	Stone, Chase A.	B110	Emails to and from A. Gill re Tokyo Century.	0.2	\$650.00	\$130.00
10/06/2026	Malmed, Shantal	B160	Conference with C. Stone re fee app.	0.1	\$545.00	\$54.50
10/07/2026	Stone, Chase A.	B110	Emails to and from S. Samarasinghe regarding withdrawal of claim in Central District of California bankruptcy matter and execution of amended settlement agreement.	0.2	\$650.00	\$130.00
10/13/2026	Malmed, Shantal	B160	Conference with C. Stone re fee app.	0.3	\$545.00	\$163.50
10/13/2026	Malmed, Shantal	B160	Revise fee app; correspond with B. Moldo re same.	2.4	\$545.00	\$1,308.00
10/14/2026	Moldo, Byron Z.	B160	Prepare ECJ final fee application	1.0	\$1,150.00	\$1,150.00
10/14/2026	Malmed, Shantal	B160	Review B. Moldo's redline changes to fee app and correspond with B. Moldo re same.	0.4	\$545.00	\$218.00
10/14/2026	Malmed, Shantal	B160	Revise fee app.	1.8	\$545.00	\$981.00
10/14/2026	Malmed, Shantal	B160	Correspond with L. Ponce and B. Moldo re revised invoice reflecting new time entries re revising fee app.	0.3	\$545.00	\$163.50
10/14/2026	Malmed, Shantal	B160	Correspond with S. Burnell re value of estate funds re preparation of first and final fee app.	0.2	\$545.00	\$109.00
10/14/2026	Malmed, Shantal	B160	Review docket re revising fee app.	0.2	\$545.00	\$109.00
10/14/2026	Malmed, Shantal	B160	Review local rules re 9013-1(o) and negative notice; correspond with B. Moldo re same.	0.2	\$545.00	\$109.00

Date	Timekeeper	Code	Description	Hours	Rate	Amount
10/15/2026	Malmed, Shantal	B160	Revise fee app; correspond with B. Moldo re same.	1.7	\$545.00	\$926.50
10/15/2026	Malmed, Shantal	B160	Correspond with S. Carson re revising exhibits to fee app.	0.2	\$545.00	\$109.00
10/15/2026	Malmed, Shantal	B160	Review new billing statement re correspondence with L. Ponce re revising fee app.	0.5	\$545.00	\$272.50
Total Fees				234.5		\$167,091.50

Summary of Fees by Activity Code

Code	Description	Hours	Fees
B110	Case Administration	52.6	\$36,227.50
B120	Asset Analysis and Recovery	21.2	\$19,390.00
B130	Asset Disposition	5.2	\$3,422.50
B140	Relief from Stay/Adequate Protection Proceedings	1.5	\$975.00
B150	Meetings of and Communications with Creditors	21.2	\$14,460.00
B160	Fee/Employment Applications	33.3	\$20,470.50
B170	Fee/Employment Objections	0.2	\$130.00
B185	Assumption/Rejection of Leases and Contracts	1.5	\$975.00
B190	Other Contested Matters	9.5	\$6,276.00
B210	Business Operations	8.0	\$6,822.50
B230	Financing/Cash Collateral	62.7	\$45,397.50
B240	Tax Issues	3.6	\$3,275.00
B310	Claims Administration and Objections	1.0	\$777.50
B320	Plan and Disclosure Statement	0.7	\$497.50
B410	General Bankruptcy Advice/Opinions	2.9	\$1,885.00
B420	Restructurings	9.4	\$6,110.00
Total		234.5	\$167,091.50

Summary of Fees by Timekeeper

Timekeeper	Hours	Rate	Fees
Moldo, Byron Z.	43.0	\$1,075.00	\$46,225.00
Moldo, Byron Z.	1.0	\$1,150.00	\$1,150.00
Slater, Jared	3.6	\$655.00	\$2,358.00
Stone, Chase A.	148.1	\$650.00	\$96,265.00
Gabai, Danielle R.	16.3	\$550.00	\$8,965.00
Allen, Dylan	6.2	\$535.00	\$3,317.00
Hosfield, Tanner F.	2.4	\$515.00	\$1,236.00
Malmed, Shantal	13.9	\$545.00	\$7,575.50
Total	234.5		\$167,091.50

Ervin Cohen & Jessup LLP

In re CIS International Holdings (N.A.) Corporation, Case No. 2:25-bk-18374-BR
Itemized Expenses — September 22, 2025 through October 23, 2026

Date	Code	Description	Vendor	Amount
10/01/2025	E106	Online Research	West Publishing Corporation	\$35.11
10/03/2025	E108	Postage Expense		\$2.06
10/06/2025	E101	Outside Document Reproduction Services	Craig Sommerstein	\$250.43
10/07/2025	E106	Online Research	PACER Service Center	\$0.20
10/08/2025	E108	Postage Expense		\$0.74
10/10/2025	E101	Outside Document Reproduction Services	Craig Sommerstein	\$674.36
10/14/2025	E108	Postage Expense		\$99.54
10/15/2025	E107	Messenger/Attorney Services	Legal Support Network, LLC	\$79.50
10/15/2025	E107	Messenger/Attorney Services	Legal Support Network, LLC	\$75.00
10/15/2025	E107	Messenger/Attorney Services	Legal Support Network, LLC	\$138.75
10/31/2025	E107	Messenger/Attorney Services	First Legal Buyer Inc.	\$18.70
10/31/2025	E107	Messenger/Attorney Services	First Legal Buyer Inc.	\$12.95
11/19/2025	E108	Postage Expense		\$172.80
01/06/2026	E106	Online Research	PACER Service Center	\$105.60
Total Expenses				\$1,665.74

Summary of Expenses by Category

Code	Description	Amount
E101	Copying	\$924.79
E106	Online Research	\$140.91
E107	Delivery Services/Messenger	\$324.90
E108	Postage	\$275.14
Total		\$1,665.74

Total Fees and Expenses	\$168,757.24
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EXHIBIT “2”

1 Byron Z. Moldo (SBN 109652)
bmoldo@ecjlaw.com
2 Chase Stone (SBN 335228)
cstone@ecjlaw.com
3 **ERVIN COHEN & JESSUP LLP**
9401 Wilshire Boulevard, Twelfth Floor
4 Beverly Hills, California 90212-2974
Telephone: (310) 273-6333
5 Facsimile: (310) 859-2325

6 Proposed Attorneys for Former Debtor and
Debtor in Possession CIS International Holdings
7 (N.A.) Corporation dba E Tropical Fish



8
9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**
11

12 In re
13 CIS International Holdings (N.A.) Corporation
dba E Tropical Fish,
14 Debtor.
15

Case No. 2:25-18374-BR

Chapter 7

**ORDER APPROVING APPLICATION TO
EMPLOY ERVIN COHEN & JESSUP LLP
AS GENERAL BANKRUPTCY COUNSEL**

Hon. Barry Russell

[No Hearing Requested]

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19 On October 13, 2025, CIS International Holdings (N.A.) Corporation dba E Tropical Fish
20 (“CIS” or “Debtor”) filed the *Notice of Application and Application of Debtor and Debtor-in-*
21 *Possession for Authority to Employ Ervin Cohen & Jessup LLP as General Bankruptcy Counsel;*
22 *and Statement of Disinterestedness* (the “**Application**”) [Docket No. 41].

23 Pursuant to Local Bankruptcy Rule 9013-1(o)(1)(A)(ii), any opposition or request for
24 hearing was due within fourteen (14) days of filing. On October 22, 2025, this case was converted
25 to Chapter 7 [Docket No. 80]. No opposition to the Application was filed or served. For good
26 cause appearing, it is ORDERED that:

27 The Court, having reviewed the Application, and for good cause, it is hereby

28 1. ORDERED that the Application to employ Ervin Cohen & Jessup LLP (“ECJ”) as

1 Debtor's Chapter 11 general bankruptcy counsel is approved, and it is further

2 2. ORDERED that ECJ's compensation as general bankruptcy counsel is subject to 11
3 U.S.C. § 330.

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24 Date: December 3, 2025



25 Barry Russell
26 United States Bankruptcy Judge
27
28

EXHIBIT “3”

ERVIN COHEN & JESSUP_{LLP}



BYRON Z. MOLDO

PARTNER

bmoldo@ecjlaw.com

Direct 310.281.6354

Byron Z. Moldo is a Partner and Chair of Receivership, Bankruptcy, and Creditors' Rights Services.

Born and raised in Los Angeles, Byron's entire legal career has specialized in bankruptcy, receivership, assignments for the benefit of creditors and all aspects of insolvency. He regularly serves as a Receiver in state and federal court cases, as assignee for the benefit of creditors and as a fiduciary in other court-supervised matters. In addition, a substantial portion of his work consists of serving as general or special counsel to receivers, bankruptcy trustees and other fiduciaries. He also represents

EDUCATION

J.D., Southwestern Law School

B.A., University of California, Los Angeles

PRACTICE AREAS

[Litigation and Alternative Dispute Resolution](#)

[Receivership, Bankruptcy, and Creditors' Rights Services](#)

creditors' committees and secured creditors, and has been appointed as a Disbursing Agent, Chapter 11 Plan Confirmation Agent and to serve in other fiduciary capacities.

Byron previously served as a Chapter 7 and 11 Bankruptcy Trustee in the Central District of California for approximately ten years. He also serves as a mediator for the Bankruptcy Mediation Program of the Central District of California, and the United States District Court for the Central District of California. He regularly speaks at, and writes materials for continuing legal education seminars related to bankruptcy and receivership. He is admitted to practice in all state and federal courts in California.

Throughout his career Byron has volunteered substantial time by working with children in local sports, and participating in events sponsored by Crossroads School and Windward School where his children attended.

Byron's passions include wine, food and travel.

PAST EMPLOYMENT

- Moldo Davidson Fraioli Seror & Sestanovich LLP, Los Angeles, California, Partner

Honors & Recognitions

500 Leading Global Bankruptcy & Restructuring Lawyers,
Lawdragon, 2025, 2026

Legal 'Visionary', *L.A. Times*, *Business of Law*, 2022

Best Lawyers in America, Recognized since 2008

ADMISSIONS

California



Community & Professional

GGI Geneva Group International, Global Chairperson, Debt Collection, Restructuring and Insolvency Practice Group

National Association of Federal Equity Receivers (NAFER), Full Member; Chairperson-Membership Committee

California Bankruptcy Forum, Los Angeles/Orange County Chapter

California Receiver's Forum

State Bar of California, Business Law Section, Legislation Subcommittee, Chair

State Bar of California, Business Law Section, Insolvency Law Committee

Los Angeles Bankruptcy Forum

Beverly Hills Bar Association

Westwood Bar Association, Former President

Southern California Bankruptcy Inns of Court, Founding Member

Client Alerts

[35 Ervin Cohen & Jessup Attorneys Named As 2027 "Best Lawyers In America"](#)

Best Lawyers, 08.20.2026

Byron Moldo Joins Andy Serbe on *Legal Lens* to Discuss Retail

Bankruptcies

ION Analytics, 08.27.2025

34 Ervin Cohen & Jessup Attorneys Named "Best Lawyers In America"

08.21.2025

Two Ervin Cohen & Jessup Partners Named 'Leading Global Bankruptcy Lawyers'

07.07.2025

Partner Byron Moldo Quoted In The Los Angeles Times

Los Angeles Times, 07.07.2022

Partner Byron Moldo Quoted in the Guardian on the Mega-Mansion "The One"

03.04.2022

Partner Byron Moldo Quoted In The Los Angeles Times

Los Angeles Times, 03.01.2022

Byron Moldo Featured By MoneyGeek Discussing Paying Off Debt in Collections

MoneyGeek, 03.2021

Partner Byron Moldo Discusses the Financial Fallout of the Pandemic in the LA Business Journal's Bankruptcy Roundtable

Los Angeles Business Journal, 07.29.2020

ECJ Partner Byron Moldo Quoted In The Southern California Record

Southern California Record , 04.15.2020

Two Ervin Cohen & Jessup Partners Selected to Geneva Group International Leadership

11.14.2018

ECJ's Byron Moldo Weighs In on Bankruptcy of Large Beverly Hills Media Company

Blog Posts

[Coronavirus Advice for Creditors](#)

ECJ Blogs, 03.23.2020

Publications

[Subchapter V of the US Bankruptcy Code](#)

GGI Global Alliance's Debt Collection, Restructuring & Insolvency News, 06.12.2020

[Substantive Consolidation, its Application, and the Authority](#)

10.11.2019

[When Breaking Up Is Hard, Call A Partition Referee](#)

05.24.2016

[Relativity Bankruptcy Auction: Speed Is an Issue](#)

Contributing Member, Variety, 08.2015

[An Interview: Judge Dean Pregerson](#)

Receivership News, Summer 2015

Speaking Engagements

[Raising the White Flag: Why Consider Abandoning Bankruptcy to an Alternative Choice](#)

California Bankruptcy Forum, Webinar, 05.14.2021

[GGI Debt Collection, Restructuring & Insolvency Webinar](#)

Geneva Group International, Live Webcast, 12.01.2020

["Ask the Receiver"](#)

CRF Loyola VIII Symposium, Renaissance Hotel, Newport Beach, 01.24.2020

Can That Be Included Too? Expanding the Scope of the Receivership.

National Association of Federal Equity Receivers, Scottsdale, AZ,
10.18.2019

Substantive Consolidation

GGI's Best Practices & Marketing Professionals Conference,
Wichita, Kansas, 09.19.2019

Practice Tips and Issues at the Intersection of Litigation and
Bankruptcy/Receivership Matters

GGI Pan-American Regional Conference, Houston, TX, 06.2019

Health & Safety Receiverships: Legal Breakthroughs and Lessons
from the Trenches

California Receivers Forum, Costa Mesa, CA, 06.2019

Money, Money, Money: Tax, Insurance, Expenses and Reporting

National Association of Federal Equity Receivers, Washington,
D.C., 10.13.2016

Locating and Recovering Hidden or Concealed Assets

PFAC Conference, Indian Wells, CA, 06.2016

Sales Free and Clear for Business and Realty – Does it Matter

What Type of Property?

Loyola VI Receivership Symposium, Irvine, CA, Jan. 2015

Growing Your Real Estate Brokerage Business By Expanding Into
New Markets

CCIM (Certified Commercial Investment Member), Los Angeles,
CA, 05.2013

Real Estate Receiverships

CEB, Los Angeles, CA, 09.2012

Byron Moldo Named Leading Bankruptcy Lawyer

06.20.2024

Fifteen Ervin Cohen and Jessup Attorneys Named to 2024 Super

Lawyers Lists

01.15.2024

Ten Ervin Cohen & Jessup Attorney Named "Best Lawyers In America" And Two Named "Ones To Watch"

09.01.2023

Eighteen Ervin Cohen & Jessup Attorneys Recognized in 2024 Edition of Best Lawyers in America & Best Lawyers: Ones To Watch

08.18.2023

ECJ Partners Randall Leff and Byron Moldo Named "Legal Visionaries" by the Los Angeles Times

07.06.2022

Partner Byron Moldo Named a Global Chairperson with Geneva Group International

09.30.2021

Ervin Cohen & Jessup Named Receiverships Law Firm of the Year

06.09.2015

ERVIN COHEN & JESSUP LLP



JARED W. SLATER

PARTNER

jslater@ecjlaw.com

Direct 310.281.6330

Jared W. Slater is a Partner in ECJ's Litigation and Employment Departments.

Jared's practice focuses on defending labor and employment actions, including claims for wage and hour violations, harassment, and discrimination both in the individual and class action arenas. He also devotes a significant portion of his practice to defending professionals whose former clients bring claims against them.

EDUCATION

J.D., University of Southern California, Gould School of Law

B.A., University of California, Los Angeles, Psychology

PRACTICE AREAS

[Litigation and Alternative Dispute Resolution](#)

[Employment](#)

Prior to joining ECJ, Jared obtained complete defense verdicts at trial and favorable results on dispositive motions and in mediations. In doing so, his clients have lauded him for his personal approach to each of their cases. Jared has also gained substantial trial experience defending legal malpractice, employment and personal injury actions.

Honors & Recognitions

[Super Lawyers: Southern California Rising Stars, 2025](#)

[JD Supra Readers' Choice Top Author, 2025, 2026](#)

Best Lawyers: Ones to Watch, Recognized since 2026

Leaders of Influence: Labor & Employment Attorneys, *Los Angeles Business Journal*, 2025

Client Alerts

[Three Ervin Cohen & Jessup Partners Top Lawdragon's 2027](#)

["Leading Corporate Employment Lawyers" List](#)

Lawdragon, 10.14.2026

[Two Ervin Cohen & Jessup Partners Named to Los Angeles](#)

[Business Journal's 2026 Leading Employment Attorneys List](#)

Los Angeles Business Journal, 09.15.2026

[Jared Slater quoted in Bloomberg Law's Daily Labor Report -](#)

[Google's Spirit Air AI Data Bid Reveals Worker Protection Void](#)

Bloomberg Law - Daily Labor Report, 09.15.2026

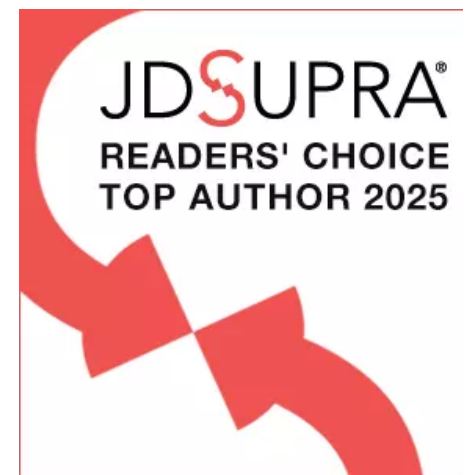
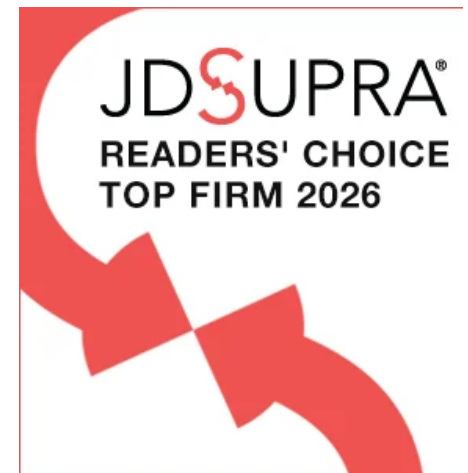
[35 Ervin Cohen & Jessup Attorneys Named As 2027 "Best](#)

[Lawyers In America"](#)

Best Lawyers, 08.20.2026

ADMISSIONS

California



Jared Slater Discusses the Strategic Calculus Behind Harassment Settlements

Variety, 02.12.2026

Jared Slater quoted in *Law360* '4 Tips For Employers When Layoffs Can't Be Avoided'

Law360, 11.07.2025

Two Ervin Cohen & Jessup Partners Named Top Employment Attorneys By *Los Angeles Business Journal*

09.09.2025

34 Ervin Cohen & Jessup Attorneys Named "Best Lawyers In America"

08.21.2025

Jared Slater quoted in *Law360* 'New Jersey Litigation Highlights For The 1st Half Of 2025'

Law360, 08.08.2025

Client Alert: ECJ's Employment Department Launches Employer Audit Compliance Service

03.25.2025

Jared Slater quoted in *Modern Healthcare* 'How healthcare systems are navigating Trump's anti-DEI push'

Modern Healthcare, 03.25.2025

Jared Slater Authored an Article in the *Daily Journal* Titled "Planes, Trains, and Automobiles in the Modern Arbitration World."

Daily Journal, 02.26.2024

Blog Posts

One Motion, One Chance: A Second Motion to Compel Arbitration May Be Deemed a "Renewed Motion" | By: Jared W. Slater

Ninth Circuit Permits EFAA Election After Arbitration Has
Commenced | By: Jared W. Slater

The Staff Report, 09.23.2026

An Arbitration Clause Specific to an Employment Agreement
Might Not Apply to Common Employment Claims | By Jared W.
Slater

Employment Law Reporter, 09.21.2026

EFAA Uncertainty Does Not Excuse a Delayed Motion to Compel
Arbitration | By: Jared W. Slater

The Staff Report, 09.16.2026

Signed the Same Day, Read Together: The Mutuality Problem
Hiding in Onboarding Documents | By: Jared W. Slater

The Staff Report, 09.01.2026

In re Orr and New State Law Mandate a New Approach for
Enforcing Arbitration Agreements | By Jared W. Slater

The Staff Report, 08.13.2026

Client Alert: ICE Expands the List of I-9 Errors That Carry
Immediate Fines | By: Jared W. Slater

The Staff Report, 08.11.2026

Sexual Orientation Harassment Can Trigger Federal Arbitration
Exemption | By: Jared W. Slater

The Staff Report, 08.05.2026

Ninth Circuit Confirms Employment-Specific Arbitration
Language Survives *Cook* | By: Jared W. Slater

The Staff Report, 07.28.2026

California Broadens the FAA's Transportation-Worker Exemption
for Delivery Drivers | By: Jared W. Slater

Employment Law Reporter, 07.23.2026

Governor Newsom Signs Executive Order Regarding Growing AI

Trend in Employment | By: Jared W. Slater

The Staff Report, 06.17.2026

Whose Agreement Is It Anyway? Court of Appeal Rejects
Employer's Attempt to Invoke Staffing Agency Arbitration
Provisions | By: Jared W. Slater

The Staff Report, 05.26.2026

"All" Means All: The Court of Appeal's Latest Warning on
Overbroad Arbitration Agreements | By: Jared W. Slater

The Staff Report, 05.11.2026

Inconsistencies Among Contemporaneous Arbitration
Agreements May Not Be Fatal to Enforcement | By Jared W. Slater

Employment Law Reporter, 04.30.2026

Ninth Circuit Upholds Arbitration Delegation Clause Despite
Contrary Severability Language | By: Jared W. Slater

The Staff Report, 04.08.2026

From *Cook* to *Ayala-Ventura*: Drawing the Line on "Infinite"
Arbitration Clauses | By: Jared W. Slater

Employment Law Reporter, 03.26.2026

Employers Use Arbitration Awards to Preclude Private Attorneys
General Act Claims | By: Jared W. Slater

The Staff Report, 03.10.2026

Tiny Fonts, Narrow Holding: California Clarifies When Fine Print
Matters | By: Jared W. Slater

Employment Law Reporter, 02.25.2026

California Court Upholds Federal Arbitration Act Election in
Employment Arbitration Agreements | By: Jared W. Slater

The Staff Report, 02.17.2026

The Risk of Boilerplate PAGA Waivers in Employment Arbitration
Agreements | By: Jared W. Slater

The Staff Report, 02.11.2026

Employment Arbitration Agreement Rollout During Class Action

Backfires in Federal Court Case | By: Jared W. Slater

Employment Law Reporter, 02.02.2026

Why Collateral Terms in Your Non-Disclosure Agreement May - or

May Not - Tank Your Arbitration Policy | By: Jared W. Slater

Employment Law Reporter, 01.29.2026

PAGA Standing Remains a Matter for the Courts Even After

Arbitration | By: Jared W. Slater

The Staff Report, 01.22.2026

Understanding the Broad Reach of the EFAA in California | By:

Jared W. Slater

Employment Law Reporter, 01.20.2026

Playing the Long Game: How an Employer's Litigation Strategy

Waived the Right to Arbitration | By: Jared W. Slater

The Staff Report, 01.15.2026

Warning: Your Sister Company Might Be Your Joint Employer

Liability Partner | By: Jared W. Slater

The Staff Report, 12.18.2025

SB 446 and California's New Thirty-Day Data Breach Countdown |

By: Jared W. Slater

The Staff Report, 12.09.2025

New Enforcement Law Requires Review of Tip Handling | By:

Jared W. Slater

The Staff Report, 11.25.2025

New Law Increases Employer Exposure to FEHA Litigation | By:

Jared W. Slater

The Staff Report, 11.19.2025

The High Price of Delay: California's SB 261 and the Triple

Penalty | By: Jared W. Slater, Esq.

The Staff Report, 11.06.2025

The “Net Effect” Rule That Can Sink Arbitration Agreements | By:

Jared W. Slater

Employment Law Reporter, 10.28.2025

The Hidden Cost of Fine Print: A Warning to Employers Drafting Arbitration Agreements | By: Jared W. Slater

The Staff Report, 10.22.2025

Another Crucial Win for Employers re: Untimely Arbitration Fee Payments | By: Jared W. Slater

Employment Law Reporter, 10.16.2025

Client Alert: California's Civil Rights Council Approves New Regulations On AI In Employment | By: Jared W. Slater

Legal Bites, The Staff Report, 09.22.2025

Employers May Now Obtain Equitable Relief for Untimely Arbitration Payments | By: Jared W. Slater

Employment Law Reporter, The Staff Report, 08.20.2025

California Appellate Courts Split on “Headless” PAGA Standing: CRST Expedited Permits Broad Claims, While Leeper Awaits Review | By: Jared W. Slater

The Staff Report, 08.05.2025

A New Era for Workplace Surveillance? | By: Jared W. Slater

Employment Law Reporter, 07.29.2025

Assembly Bill 1018: A Bill for Employers to Keep an (A)Eye On | By: Jared W. Slater

The Staff Report, 07.22.2025

Surprise! Misleading Statements and Time Pressure May Render an Employer’s Arbitration Agreement Unenforceable | By: Jared W. Slater

The Staff Report, 07.15.2025

Contemporaneous Onboarding Documents May Invalidate An Employer’s “Squeaky Clean” Arbitration Agreement | By: Jared W. Slater

The Staff Report, 07.08.2025

[Employers Beware: Lessons from *Sanders v. Superior Court of Los Angeles County* | By: Tanner Hosfield and Jared W. Slater](#)

The Staff Report, 06.10.2025

[The Importance of Having an Up-To-Date Employment Arbitration Agreement | By: Jared W. Slater](#)

Legal Bites, The Staff Report, 05.13.2025

[To Sever or Not to Sever, That is the Question For Courts Reviewing Employment Arbitration Agreements for Enforceability | By: Jared W. Slater](#)

The Staff Report, 04.08.2025

[Another Day, Another Dispute Between Appellate Courts Over Employment Arbitrations | By: Jared W. Slater](#)

The Staff Report, 04.01.2025

[The Importance of Compliance Audits Under the Amended Private Attorneys General Act | By: Jared W. Slater](#)

The Staff Report, 03.19.2025

[An Attorney's Inadvertence, Mistake, or Excusable Neglect Is Not Sufficient to Overcome The Bright-Line Rule for Arbitration Fee Payments | By: Jared W. Slater](#)

The Staff Report, 03.18.2025

[Sexual Harassment Claims Preclude Arbitration Even if the Federal Arbitration Act is Not Explicitly Invoked in an Arbitration Agreement | By: Jared W. Slater](#)

Legal Bites, The Staff Report, 03.11.2025

[Court of Appeal Harmonizes Enforcement of Arbitration Agreements with Arbitrator's Authority | By: Jared W. Slater](#)

The Staff Report, 03.06.2025

[Arbitration Fee Payment Statute Does Not Apply To Post-Dispute Arbitration Agreements | By: Jared W. Slater](#)

The Staff Report, 02.26.2025

Every PAGA Action Has An Individual Component Which May Be

Subject To Arbitration | By: Jared W. Slater

Legal Bites, The Staff Report, 02.19.2025

Equitable Estoppel Can Be Invoked By a Non-Signatory Joint

Employer to Compel Arbitration | By: Jared W. Slater

The Staff Report, 02.11.2025

Los Angeles and San Diego Counties Enact Fair Chance

Ordinances for Unincorporated Areas | By: Jared W. Slater

The Staff Report, 01.02.2025

Single Sexual Harassment Claim Eliminates Arbitration of All

Employment-Related Claims in the Same Case | By: Jared W.

Slater

The Staff Report, 12.30.2024

Stricter Controls Over Wage Statement Penalty Awards Are a Gift

For Some | By: Jared W. Slater

The Staff Report, 12.27.2024

“Prejudice” No Longer an Element to Determine Waiver of Right

to Compel Arbitration | By: Jared W. Slater

The Staff Report, 12.19.2024

Entertainment Vendors Must Certify Safety Training for

Employees By: Jared W. Slater

The Staff Report, 12.05.2024

California Employers Prohibited from Mandatory Religious or

Political Meetings | By: Jared W. Slater

The Staff Report, 12.04.2024

Severing Unconscionable Terms in Employment Arbitration

Agreements | By: Jared W. Slater

The Staff Report, 08.27.2024

Overbroad Employment Arbitration Agreements Will Not Be

Enforced in California | By: Jared W. Slater

The Staff Report, 08.13.2024

[The Battle for Supremacy: Federal Arbitration Act v. California](#)

[Arbitration Act](#) | By: Jared W. Slater

The Staff Report, Legal Bites, 07.30.2024

[Another Blow to E-Signed Arbitration Agreements in California](#)

By: Jared W. Slater

The Staff Report, Legal Bites, 07.23.2024

[Workplace Violence Prevention Plans and Trainings Must be Implemented by July 1](#) | By: Jared Slater

The Staff Report, 06.26.2024

[Employer Alert: Workplace Violence Prevention Plans for California Employers Must be Established by July 1, 2024](#)

Legal Bites, The Staff Report, 05.02.2024

[Previous Arbitration Agreements Are Potentially Unenforceable Against Re-Hired Employees](#)

Legal Bites, The Staff Report, 04.25.2024

[When Does a “Dispute” Arise Under the Ending Forced Arbitration of Sexual Assault and Sexual Harassment Act?](#)

The Staff Report, 02.27.2024

[California Court of Appeals Reinforces Strict Limits on Arbitration Fee Payment Deadline](#)

The Staff Report, 02.20.2024

[Trial Courts Do Not Have Authority to Dismiss PAGA Claims for Lack of Manageability](#)

The Staff Report, 02.13.2024

[Happy Valentine’s Day! A Reminder that Employers Must Notify Employees of Void Non-Compete Clauses and Agreements by February 14, 2024](#)

The Staff Report, 02.05.2024

[California Expands Protections for Employee Conduct](#)

The Staff Report, 11.28.2023

[Appealing A Petition to Compel Arbitration Ruling No Longer](#)

[Automatically Stays Superior Court Proceedings](#)

The Staff Report, 11.27.2023

[California Enacts Additional Restrictions on Employer Noncompete Agreements](#)

Legal Bites, The Staff Report, 11.07.2023

[California Increases Paid Sick Leave for Employees](#)

The Staff Report, 10.23.2023

[California Opens its Doors to Commerce by Voiding Out-Of-State Non-Compete Agreements](#)

Legal Bites, The Staff Report, 10.04.2023

[California Supreme Court Rules that PAGA Claims May Be Pursued in Court Despite Arbitration Agreement](#)

The Staff Report, 08.01.2023

[California Court of Appeals Holds that Joint Employers Must Sign Arbitration Agreement](#)

The Staff Report, 04.24.2023

[Court Rules Outside Salesperson Exemption Turns on Employer Control](#)

The Staff Report, 04.04.2023

[California Court of Appeals Rules that Proposition 22 is Constitutional...Mostly...For Now](#)

The Staff Report, 03.15.2023

[NLRB Declares Confidentiality and Non-Disparagement Provisions in Severance Agreements Unlawful](#)

Legal Bites, The Staff Report, 02.24.2023

[Arbitration Agreements Can Be A Condition of Employment Once Again](#)

Legal Bites, The Staff Report, 02.17.2023

California Will Create a Pilot Program Recognizing Businesses

That Create Safe and Welcoming Environments

Legal Bites, The Staff Report, 12.12.2022

Employers Beware: SB 1044 Creates a Right to Refuse to Work in Emergency Conditions

Legal Bites, The Staff Report, 12.07.2022

When Substantial Compliance Is Not Enough: A Cautionary Ruling For Employment Arbitration Actions

Legal Bites, The Staff Report, 11.22.2022

California Court of Appeals Provides Guidance on Wage Order Seating Requirements

The Staff Report, 08.31.2022

Update: Challenge to California's Arbitration Agreement Law Marches On

Legal Bites, The Staff Report, 08.29.2022

Another Minimum Wage Increase? There's a Referendum for That

The Staff Report, 08.22.2022

United States Supreme Court Overrules Ban on PAGA Arbitrations

Legal Bites, The Staff Report, 06.21.2022

California's Supreme Court Declares Meal and Rest Period Premiums are "Wages"

The Staff Report, Legal Bites, 06.01.2022

Supreme Court Hears Oral Argument on Arbitrability of California's Private Attorneys' General Act Under Federal Arbitration Act

The Staff Report, 04.01.2022

Supreme Court Upholds Vaccine Mandate for Medicare and Medicaid-Certified Providers and Suppliers

The Staff Report, 01.20.2022

[United States Supreme Court Imposes Stay on OSHA Vaccine](#)

[Mandate](#)

The Staff Report, 01.13.2022

[Los Angeles County Tightens Mask Mandates for Employers](#)

The Staff Report, 01.07.2022

[Mandatory Arbitration Agreements in California: Down, But Possibly Not Out](#)

The Staff Report, 12.27.2021

[Recent Private Attorneys General Act Reform Efforts](#)

The Staff Report, 12.22.2021

[New Private Attorneys General Act Developments](#)

The Staff Report, 12.15.2021

[Following COVID-19 Related Guidance Just Became Easier for Employers](#)

The Staff Report, 12.14.2021

[Senate Bill 762: Another Tall Hurdle for Employers Seeking Arbitration](#)

The Staff Report, 12.13.2021

[Changes To Statutory Covid-19 Exposure Notice and Reporting Requirements](#)

Legal Bites, 11.18.2021

[SB 639: The Hidden Cost of Phasing Out Certificate Programs for Workers With Disabilities](#)

The Staff Report, *Legal Bites*, 11.15.2021

[New Law Enhances Labor Commissioner's Ability to Lien Employer Real Property](#)

The Staff Report, 11.11.2021

[Mandatory Arbitration Agreements are Unenforceable in California, Again](#)

The Staff Report, 09.17.2021

Publications

Daily Journal - "Planes, Trains, and Automobiles in the Modern

Arbitration World." | By: Jared Slater

Daily Journal, 03.07.2024

State of Employment Arbitrations: 2023 Edition | By: Jared W.

Slater

Employment Law Reporter, 12.05.2023

California's Supreme Court Declares Meal and Rest Period

Premiums are "Wages"

Employment Law Reporter, Ervin Cohen & Jessup LLP, 06.01.2022

United States Supreme Court Imposes Stay on OSHA Vaccine

Mandate: What Does it Mean for Restaurants?

Modern Restaurant Management, 01.14.2022

California's Independent Contractor Statute is Not Preempted by

Federal Law

Employment Law Reporter, Ervin Cohen & Jessup LLP, 12.07.2021

Meal and Rest Break Claims for California Drivers Engaged in

Interstate Commerce Remain Preempted by Federal Law

Employment Law Reporter, Ervin Cohen & Jessup LLP, 12.03.2021

Changes To Statutory Covid-19 Exposure Notice and Reporting

Requirements

Employment Law Reporter, Ervin Cohen & Jessup LLP, 11.18.2021

California Supreme Court Declines to Reverse Restriction on

Criminal Background Checks

Employment Law Reporter, Ervin Cohen & Jessup LLP, 10.05.2021

California Supreme Court Issues Retroactive Decision on

Calculating Meal and Rest Break Premium Pay

Employment Law Reporter, Ervin Cohen & Jessup LLP, 07.19.2021

[Proposed Legislation Likely to Create Problems for California](#)

[Employers](#)

Employment Law Reporter, Ervin Cohen & Jessup LLP, 06.10.2021

[California Supreme Court Signals the End for Rounding Meal](#)

[Break Time](#)

Employment Law Reporter, Ervin Cohen & Jessup LLP, 05.10.2021

[What Employers Need to Know About the \\$15.00 Federal](#)

[Contractor Minimum Wage](#)

Employment Law Reporter, Ervin Cohen & Jessup LLP, 04.30.2021

Can Dr. Jekyll Sign for Mr. Hyde?: Examining The Rights of
Individuals Suffering From Dissociative Identity Disorder In Civil
Contexts

24 S. Cal. Rev. L. & Soc. Just. 239, 2015

Speaking Engagements

[2025 New Laws Seminar](#)

Hybrid: In person & Zoom, 01.22.2025

Understanding Employment Contracts

UCLA Radiology Fellows Career Symposium, 10.09.2021

ERVIN COHEN & JESSUP_{LLP}



CHASE A. STONE

SENIOR ASSOCIATE

cstone@ecjlaw.com

Direct 310.281.6369

Chase A. Stone is a Senior Associate in the Receivership, Bankruptcy, and Creditors' Rights Department at Ervin Cohen & Jessup LLP in Beverly Hills, California.

His practice covers all aspects of insolvency, including bankruptcy, receiverships, out-of-court workouts, and assignments for the benefit of creditors (ABCs). He advises clients across industries such as retail and real estate, as well

EDUCATION

LL.M, UCLA School of Law,
Business Bankruptcy

J.D., UC Davis School of
Law

M.S., University of
Michigan

B.A., Oberlin College, *with
Honors*

as mid-sized businesses, individuals, and court-appointed fiduciaries throughout Southern California.

Chase serves as a partition referee, appointed by California courts to sell real property owned by tenants in common. He also represents court-appointed receivers and other fiduciaries in partition actions and receivership proceedings, including equity, Health and Safety Code, and rents and profits receiverships. His work involves shareholder and partnership disputes, fraud or mismanagement cases, corporate insolvency, and managing distressed real estate portfolios.

Chase has extensive experience representing secured and unsecured creditors in bankruptcy proceedings, including individual Chapter 11 debtors, claim recovery, post-judgment collections, lease assumption and assignment disputes, and adversary litigation such as nondischargeability and preference actions.

Chase is Co-Chair of the California Lawyers Association's Insolvency Law Committee. Prior to joining ECJ, Chase served as a judicial law clerk for the Honorable Ronald A. Clifford III and the Honorable Victoria S. Kaufman in the U.S. Bankruptcy Court for the Central District of California.

In re Core Scientific, Inc. (U.S. Bankruptcy Court for the Southern District of Texas) (Case No. 22-90341) – Represented claimants with over \$22 million in combined claims to successfully resolving dispute with the debtor regarding calculation of claims.

PRACTICE AREAS

Receivership, Bankruptcy,
and Creditors' Rights
Services

ADMISSIONS

California

U.S. District Court

U.S. District Court, Central
District of California

U.S. District Court, Eastern
District of California

U.S. District Court, Northern
District of California

U.S. District Court,
Southern District of
California

Celsius Network LLC, et al. (U.S. Bankruptcy Court for the Southern District of New York) (Case No. 22-10964) – Obtained favorable outcome under section 503(b)(3)(D) for award of substantial contribution over objections, including from the Office of the United States Trustee, and assisted in negotiations of plan support agreement.

U.S. Bankruptcy Court for the Central District of California – Successfully negotiated settlement on behalf of individual Chapter 11 debtor, reducing prepetition judgment of \$18 million by nearly half and resolving longstanding dispute in favor of the debtor.

U.S. Bankruptcy Court for the Northern District of California/Santa Clara Superior Court – Assisted in representation of court-appointed receiver in claims brought against receiver personally by bankruptcy trustee, reducing liability to \$0.

Honors & Recognitions

[Super Lawyers: Southern California Rising Stars, 2025, 2026](#)

Best Lawyers: Ones to Watch, Recognized since 2026

Community & Professional

California Lawyers Association, Insolvency Law Committee
Co-Chair 2026-2027

Official Liaison of the Insolvency Law Committee/Business
Law Section to the California Commission on Uniform State
Laws (CCUSL) (Model ABC Act)

Los Angeles Bankruptcy Forum

California Lawyers Association, Business Law Section,
Insolvency Law Committee Member 2024 - 2027

Client Alerts

[35 Ervin Cohen & Jessup Attorneys Named As 2027 "Best
Lawyers In America"](#)

Best Lawyers, 08.20.2026

[Chase A. Stone Explores Quasi-Judicial Immunity for State
Court Receivers](#)

California Lawyers Association, 05.19.2026

[34 Ervin Cohen & Jessup Attorneys Named "Best Lawyers In
America"](#)

08.21.2025

Publications

[In re Serta Simmons Bedding, 125 F.4th 555 \(5th Cir. 2024\) |](#)

[Case Summary & Author's Comment By: Chase A. Stone](#)

California Lawyers Association, 04.15.2025

[JJD-HOV Elk Grove, LLC v. Jo-Ann Stores, LLC | Case](#)

[Summary By: Chase A. Stone](#)

California Lawyers Association, 02.18.2025

ERVIN COHEN & JESSUP_{LLP}



DANIELLE R. GABAI

ASSOCIATE

dgabai@ecjlaw.com

Direct 310.281.6359

Danielle is an Associate in the Receivership, Bankruptcy, and Creditors' Rights Department. Her experience includes representing receivers in state court, as well as trustees, individual and corporate creditors, debtors, and transferees in bankruptcy proceedings under Chapters 7 and 11 (including Subchapter V) of the Bankruptcy Code. Danielle also has experience in Assignments for the Benefit of Creditors.

EDUCATION

J.D., USC Gould School of Law

B.A., Business Administration With a Specialization in Finance, IDC Interdisciplinary Center

Danielle earned her Juris Doctor from the University of Southern California Gould School of Law in 2021, where she also obtained a Business Law Certificate. During law school, she served as President of the Jewish Law Student Association and Outreach Chair of the Healthcare Law Society. She holds a Bachelor of Arts in Business Administration with a specialization in Finance from IDC Interdisciplinary Center in Herzliya, Israel.

PRACTICE AREAS

Receivership, Bankruptcy,
and Creditors' Rights
Services

Honors & Recognitions

Best Lawyers: Ones to Watch, Recognized since 2026

Client Alerts

35 Ervin Cohen & Jessup Attorneys Named As 2027 "Best
Lawyers In America"

Best Lawyers, 08.20.2026

34 Ervin Cohen & Jessup Attorneys Named "Best Lawyers In
America"

08.21.2025

ERVIN COHEN & JESSUP LLP



SHANTAL MALMED

ASSOCIATE

smalmed@ecjlaw.com

Direct 310.281.6314

Shantal Malmed is an Associate in ECJ's Receivership, Bankruptcy, and Creditors' Rights Services Department. Her practice focuses on complex insolvency and fiduciary matters, including receiverships, bankruptcy litigation, and asset recovery. Shantal brings experience representing trustees in Chapter 7 and Chapter 11 proceedings, handling adversary actions, settlements, and court-approved asset sales in the real estate, finance, healthcare, aviation, food and restaurants, wholesale distribution, retail, ecommerce,

EDUCATION

J.D., University of Southern California, Gould School of Law

B.A., University of California, Los Angeles

and energy industries. Notably, Shantal represented a chapter 11 trustee for a large hospital in successfully obtaining \$1 million in voluminous preference action lawsuits. Shantal also represented a chapter 7 trustee for an insolvent aviation company in the sale of property that created a completely solvent estate. Shantal currently serves as Vice Chair of the Beverly Hills Bar Association, Bankruptcy Section.

She earned her Juris Doctor from the University of Southern California Gould School of Law and holds a Bachelor of Arts, summa cum laude, from UCLA. During law school, she served as Treasurer of the Jewish Law Student Association and Academic Chair of the Women’s Law Society.

PRACTICE AREAS

Receivership, Bankruptcy,
and Creditors’ Rights
Services

Honors & Recognitions

TMA SoCal Chapter, Member, *Present*

Los Angeles Bankruptcy Forum, Member, *2023-Present*

Community & Professional

Beverly Hills Bar Association, Bankruptcy Section

- *Vice Chair, May 2024 – Present*

- *Secretary, May 2023 – May 2024*

Blog Posts

Senate Passes Bill to Permanently Raise Subchapter V Debt
Ceiling – What It Means for Small Businesses | By: Shantal
Malmed
08.19.2026

Speaking Engagements

Bridging Careers & Culture: Insights from Tech, Law, Media
and Beyond | Panelist
University of Southern California, 11.13.2024

ERVIN COHEN & JESSUP^{LLP}



DYLAN ALLEN

ASSOCIATE

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Dylan is an Associate in the Receivership, Bankruptcy, and Creditors' Rights Department. He represents receivers in state court, as well as trustees, individual and corporate creditors, debtors, and transferees in bankruptcy proceedings under Chapters 7 and 11 of the Bankruptcy Code.

During law school, Dylan gained experience through the University of Minnesota Law School's Bankruptcy Clinic, where he represented clients in personal bankruptcy proceedings. Before law school, he worked in the financial services industry, where he negotiated financial partnerships and supported commercial lending and underwriting initiatives.

Dylan earned his J.D. from the University of Minnesota Law School, where he was a member of the Jewish Law Student Association. He received his B.A. in Law, History, and Culture from the University of Southern California.

EDUCATION

J.D., University of Minnesota Law School

B.S., University of Southern California

PRACTICE AREAS

Receivership, Bankruptcy, and Creditors' Rights Services

ERVIN COHEN & JESSUP^{LLP}



TANNER HOSFIELD

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Tanner is an Associate in ECJ's Litigation and Employment Departments. His practice focuses on defending labor and employment actions, including both individual and class action cases. Tanner represents employers in a wide range of employment matters, including claims for harassment, discrimination, retaliation, wrongful termination, and wage and hour disputes. He also assists with the development of employee handbooks, policies, and procedures.

Tanner began his legal career with an AmLaw 200 law firm specializing in labor and employment defense. Tanner also has experience representing employees at a plaintiff's side employment firm while in law school, which provided him unique insights that assist his strategic approach for defending employers. During his time in law school, he also served as a Managing Editor for the UCLA Law Review.

EDUCATION

J.D., University of California, Los Angeles

B.S., University of California, Davis, Biology

BLOG POSTS

The Workplace Know Your Rights Act Adds a New Notice Requirement and Creates an Emergency Contact Option Related to Arrests and Detentions During Work Hours | By: Tanner Hosfield
The Staff Report, 12.04.2025

California's 2025 Expansion of Employee Leave Rights: What Employers Need to Know About AB 406 and SB 590 | By: Tanner Hosfield
The Staff Report, 12.02.2025

California's SB 513: Expanded Personnel File Requirements Create New Obligations for Employers | By: Tanner Hosfield
The Staff Report, 12.01.2025

California Supreme Court Defines “Reasonable Effort” That is Required for a Good-Faith Defense to a Claim for Unpaid Wages | By: Tanner Hosfield
Employment Law Reporter, 11.20.2025

Reminder: New Notice Required Regarding Expansion of Accommodations and Leave Requirements for Victims | By: Tanner Hosfield
The Staff Report, 09.24.2025

Employers Beware: Lessons from *Sanders v. Superior Court of Los Angeles County* | By: Tanner Hosfield and Jared W. Slater
The Staff Report, 06.10.2025

California Court of Appeal Decision in *Rose v. Hobby Lobby*: No Recovery of Costs Against Nonparticipating State Agency | By: Tanner Hosfield
Employment Law Reporter, 06.03.2025

California Court Narrows “Death Knell” Appeal Rule: Key Takeaways for Employers | By: Tanner Hosfield
Employment Law ReporterThe Staff Report, 05.28.2025

California Court of Appeal Rejects “Headless” PAGA Claims in *Williams v. Alacrity Solutions Group* | By: Tanner Hosfield
The Staff Report, 05.20.2025

Good News for Employers: Court Upholds Prospective Meal Break Waivers for Short Shifts | By: Tanner Hosfield
Legal BitesThe Staff Report, 05.06.2025

More PAGA Updates: LWDA Publishes FAQ; AB 1034 Extends Exemption for Construction Employees under CBA | By: Tanner Hosfield
The Staff Report, 01.22.2025

New Law Prohibits Discrimination on the Basis of Possessing a Driver's License | By: Tanner Hosfield
The Staff Report, 12.17.2024

New Law Mandates That Employees Can No Longer Be Required to Use Vacation Before Receiving Paid Family Leave Benefits | By: Tanner Hosfield
The Staff Report, 12.12.2024

Changes to PAGA Create Opportunities for Employers to Minimize Penalties | By: Tanner Hosfield
Employment Law Reporter, 08.20.2024

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

ERVIN COHEN & JESSUP LLP
9401 Wilshire Boulevard, Twelfth Floor
Beverly Hills, California 90212-2974

A true and correct copy of the foregoing document entitled (*specify*): **FIRST AND FINAL APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF FEES AND EXPENSES INCURRED BETWEEN SEPTEMBER 22, 2025 AND OCTOBER 23, 2026 BY ERVIN COHEN & JESSUP LLP AS GENERAL BANKRUPTCY COUNSEL TO CHAPTER 11 DEBTOR AND DEBTOR-IN-POSSESSION; DECLARATION OF BYRON Z. MOLDO IN SUPPORT THEREOF** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) October 27, 2026, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Ismail Amin on behalf of Creditor Newtek Bank, N.A.
iamin@talglaw.com, pgilmore@talglaw.com; kvescera@talglaw.com; shalberstadt@talglaw.com;
cstark@talglaw.com; ckim@talglaw.com; eavakian@talglaw.com; knarh@talglaw.com; kmeade@talglaw.com;
kanderson@talglaw.com

Christopher Beyer on behalf of Creditor North Star Leasing, a Division of Peoples Bank
cab@replevin.com, ecf@writofseizure.com

Michael D Breslauer on behalf of Interested Party Courtesy NEF
mbreslauer@swsslaw.com, sdurazo@swsslaw.com

Steve Burnell on behalf of Trustee David M Goodrich (TR)
Steve.Burnell@gmlaw.com,
sburnell@ecf.courtdrive.com;sburnell@ecf.inforuptcy.com;patricia.dillamar@gmlaw.com;courtmail@gmlaw.com

Richard P Cook on behalf of Attorney Richard P Cook
richard@capefeardebtreliet.com

Caroline Djang on behalf of Defendant CIS International Distributors Inc.
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Defendant Lionsrock Investments LLC
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Defendant Lionsrock Wisconsin LLC
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Defendant Live Aquaria Holdings Corp.
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Defendant Siam Tropical Fish Ltd.
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Defendant T3 Aquatics
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Defendant Tropical Quarium Fish (FIJI) Ltd
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Defendant Charitha I. Samarasinghe
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Interested Party CIS International Distributors Inc.
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Interested Party Charitha I. Samarasinghe
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Interested Party Lionsrock Investments LLC
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Interested Party Lionsrock Wisconsin LLC
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Interested Party Live Aquaria Holdings Corp.
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Interested Party Siam Tropical Fish Ltd.
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Interested Party T3 Aquatics
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Interested Party Tropical Aquarium Fish (FIJI) Ltd
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Plaintiff CIS International Distributors Inc.
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Plaintiff Charitha I. Samarasinghe
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Plaintiff Lionsrock Investments LLC
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Plaintiff Lionsrock Wisconsin LLC
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Plaintiff Live Aquaria Holdings Corp.
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Plaintiff Siam Tropical Fish Ltd.
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Plaintiff T3 Aquatics
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Caroline Djang on behalf of Plaintiff Tropical Aquarium Fish (FIJI) Ltd
cdjang@buchalter.com, docket@buchalter.com;lverstegen@buchalter.com

Dennis A Dressler on behalf of Creditor Tokyo Century (USA) Inc.
ddressler@dresslerpeters.com

James R Felton on behalf of Creditor Signature Staff Resources, LLC
jfelton@gblawllp.com, ystotland@gblawllp.com;msingleman@gblawllp.com

Angela Gill on behalf of Creditor Tokyo Century (USA) Inc.
agill@hrhlaw.com, caseview.ecf@usdoj.gov;usacac.tax@usdoj.gov

David M Goodrich (TR)
dgoodrich@go2.law, c143@ecfcbis.com;dgoodrich11@ecf.axosfs.com;lroble@go2.law

Michael Jones on behalf of U.S. Trustee United States Trustee (LA)
michael.jones4@usdoj.gov

Raffi Khatchadourian on behalf of Creditor Tokyo Century (USA) Inc.
raffi@hemar-rousso.com

Raffi Khatchadourian on behalf of Interested Party Courtesy NEF
raffi@hemar-rousso.com

Ron Maroko on behalf of U.S. Trustee United States Trustee (LA)
ron.maroko@usdoj.gov

Byron Z Moldo on behalf of Debtor CIS International Holdings (N.A.) Corporation
bmoldo@ecjlaw.com, aantonio@ecjlaw.com,dperez@ecjlaw.com,scarson@ecjlaw.com

Christopher S Murphy on behalf of Creditor Texas Comptroller of Public Accounts, Revenue Accounting
Division
bk-cmurphy@oag.texas.gov

Scott Olson on behalf of Creditor Settle Funding, LLC
solson@seyfarth.com, chidocket@seyfarth.com

Kurt Ramlo on behalf of Interested Party Courtesy NEF
RamloLegal@gmail.com, kr@ecf.courtdrive.com;ramlo@recap.email

Kurt Ramlo on behalf of Plaintiff Panthers Capital LLC
RamloLegal@gmail.com, kr@ecf.courtdrive.com;ramlo@recap.email

Patrick J Schurr on behalf of Creditor Signature Staff Resources, LLC
patrick.schurr@solidcounsel.com

Amitkumar Sharma on behalf of Creditor Ford Motor Credit Company LLC, c/o AIS Portfolio Services, LLC
amit.sharma@aisinfo.com

Chase Aleksander Stone on behalf of Debtor CIS International Holdings (N.A.) Corporation
cstone@ecjlaw.com, aantonio@ecjlaw.com,dperez@ecjlaw.com,scarson@ecjlaw.com

United States Trustee (LA)
ustpreion16.la.ecf@usdoj.gov

Cranston J Williams on behalf of Creditor Southern California Gas Company
cwilliams3@socalgas.com

Jennifer C Wong on behalf of Creditor Ford Motor Credit Company LLC
bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

Jennifer C Wong on behalf of Interested Party Courtesy NEF
bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) October 27, 2026, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

[PLEASE SEE SERVICE LIST ATTACHED]

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) October 27, 2026, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Barry Russell
United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1660 / Courtroom 1668
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 27, 2026

Sydney Carson

/s/ Sydney Carson

Date

Printed Name

Signature

**In re CIS International Holdings (N.A.) Corporation, Debtor. Case No 2:25-bk-13874-BR
United States Bankruptcy Court, Central District of California, Los Angeles Division
SERVICE LIST**

DEBTOR

CIS International Holdings (N.A.)
Corporation dba eTropical Fish
1405 W. 178th Street
Gardena, CA 90248

UNITED STATES TRUSTEE

Office of the United States Trustee
915 Wilshire Blvd #1850
Los Angeles, CA 90017

20 LARGEST CREDITORS

American Packaging Capital, Inc.
PO Box 77077
Minneapolis, MN 55480-7777

California Employee Develop. Dept.
PO Box 826218
Sacramento, CA 94230-6218

CV Sematik Perkasa Indonesia
JL Setiawarga
213BB RT 002, RW 004 Jatiranggon
Jatisampurna, Kota Bekasi **INDONESIA**

D.B. Group America, Ltd.
2351 US Route 130
Dayton, NJ 08810

Fleet Global Logistics
19 Srinakaran Rd. (4th Floor) Bangna, Bangna
Nuea
Bangkok, **THAILAND** 10260

Ford Motor Credit
PO Box 537901
Livonia, MI 48153-7901

Guangzhou Quick Production Co. A20 of Room
1001 No. 621
Tianhe Rd., Tianhe District
Guang Zhou, Guangzhou, **CHINA**

Launch Funding Group LLC
1250 E. Hallandale Beach Bl. #505
Hallandale, FL 33009

Lincoln Benefit Life Company
P.O. Box 4322
Carol Stream, IL 60197

Newtek Bank, N.A.
1111 Brickell Ave Suite 135
Miami, FL 33131

North Star Leasing Division
of Peoples Bank
P.O. Box 4505
Burlington, VT 05406-4505

Shorr Packaging
Los Angeles Branch
1100 Eliwanda Ave
Ontario, CA 91760-8658

Signature Staff Resources LLC
1460 TL Townsend Dr. # 104
Rockwall, TX 75032

Southern California Edison Company
P.O. Box 300
Rosemead, CA 91770

Teknowledge Shared Services Ltd.
27/6A Park Lane
Rajagiriya, **SRI LANKA**

U.S. Small Business Administration
Office of General Counsel
312 No. Spring Street, 5th Floor
Los Angeles, CA 90012

UPS
Executive Financial Enterprises
PO Box 894820
Los Angeles, CA 90189-4820

Victory Packaging
3550 E. Francis Street, Suite 200
Ontario, CA 91761

Western Overnight LLC
16 Corporate Woods Blvd., Ste. 1
Albany, NY 12211