

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**GARDEN OAKS MAINTENANCE
ORGANIZATION, INC.,

DEBTOR.**

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**Case No. 18-60018
(Chapter 11)**

**SECOND AND FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF DIAMOND McCARTHY LLP, AS
GENERAL COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF GARDEN OAKS MAINTENANCE ORGANIZATION, INC., FOR
THE PERIOD JUNE 4, 2018 THROUGH JUNE 6, 2019**

THIS APPLICATION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE APPLICATION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE APPLICATION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE APPLICATION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE APPLICATION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

SUMMARY OF FEE APPLICATION

Name of Applicant:	Diamond McCarthy LLP
Applicant's role in case:	Counsel to the Official Committee of Unsecured Creditors
Date Order of Appointment Signed:	August 10, 2018
Date Rule 2016(b) Statement Filed:	N/A

	<u>Beginning of Period</u>	<u>Ending of Period</u>
Time period covered by this Application:	June 4, 2018	June 6, 2019
Time period(s) covered by prior Applications:	June 4, 2018	September 30, 2018
Total amounts awarded in prior Applications:	\$0.00	
Total fees requested in this Application and in all prior Applications:	\$227,114.00	
Total fees requested in this Application:	\$227,114.00	
Total professional fees requested in this Application:	\$222,177.50	
Retainer Received:	\$0.00	
Total actual professional hours covered by this Application:	520.0	
Average hourly rate for professionals:	\$427.26	
Total paraprofessional fees requested in this Application:	\$4,936.50	
Total actual paraprofessional hours covered by this Application:	23.4	
Average hourly rate for paraprofessionals:	\$210.96	
Reimbursable expenses sought in this Application	\$5,537.49	

INDEX OF EXHIBITS

Exhibit A	Diamond McCarthy's Timekeepers and Billing Rates
Exhibit B	Diamond McCarthy's Professionals' Biographies
Exhibit C	Summary of Time Expended by Timekeepers and Categories
Exhibit C-1	Matter 11: Case and Committee Administration Invoices
Exhibit C-2	Matter 13: Fee/Employment Applications/Objections Invoices
Exhibit C-3	Matter 14: Litigation Invoices
Exhibit C-4	Matter 15: Meetings/Communications with Creditors Invoices
Exhibit C-5	Matter 16: Plan and Disclosure Statement Invoices

TO THE HONORABLE DAVID R. JONES, UNITED STATES BANKRUPTCY JUDGE:

Diamond McCarthy LLP (“Diamond McCarthy”), general counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Garden Oaks Maintenance Organization, Inc. (“GOMO”), hereby submits its Second and Final Application for Allowance of Compensation and Reimbursement of Expenses (the “Application”), pursuant to §§ 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Bankruptcy Rule 2016-1, seeking the entry of an order granting interim allowance of compensation for professional services rendered to the Committee in connection with GOMO’s chapter 11 case (the “Chapter 11 Case”) and out-of-pocket expenses incurred in connection therewith during the period from June 4, 2018 through and including June 6, 2019 (the “Application Period”). In support of the Application, Diamond McCarthy respectfully represents as follows:

JURISDICTION

1. The Court has jurisdiction over this Application pursuant to 28 U.S.C. § 1334 and the General Order of Reference from the United States District Court for the Southern District of Texas, dated May 24, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), and the Court may enter a final order consistent with Article III of the United States Constitution.

2. The Court has authority to grant the relief requested in this Application pursuant to Bankruptcy Code §§ 330 and 331, Bankruptcy Rule 2016, and Local Bankruptcy Rule 2016-1.

BACKGROUND

A. Procedural Background.

3. On April 11, 2018 (the “Petition Date”), GOMO filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code.

4. GOMO continues to operates its business as a debtor-in-possession pursuant to Bankruptcy Code §§ 1107(a) and 1108. No request has been made for the appointment of a trustee or an examiner.

5. On May 31, 2018, the United States Trustee for Region 7 (the “U.S. Trustee”) appointed the Committee pursuant to Bankruptcy Code § 1102. ECF No. 28. On June 4, 2018, the Committee selected Diamond McCarthy to serve as its counsel, subject to the approval of the Court.

6. On June 6, 2019, this Court entered its Order Converting Case to Chapter 7 (the “Conversion Order”). ECF No. 132.

B. Diamond McCarthy’s Employment.

7. Diamond McCarthy, on behalf of the Committee, filed its application for employment as general counsel to the Committee on July 5, 2018 (the “General Counsel Application”). ECF No. 36.

8. On July 19, 2018, the Committee filed a supplement in support of the General Counsel Application signed by members of the Committee. ECF No. 38.

9. The Court approved the General Counsel Application on August 10, 2018. ECF No. 47.

10. As set forth in the General Counsel Application, the Committee retained Diamond McCarthy to act as its general counsel because the firm has significant experience in bankruptcy matters.

11. In this case, Diamond McCarthy assisted the Committee by providing the following legal services, as necessary:

- Advising the Committee concerning its rights, powers and duties under § 1103 of the Bankruptcy Code;
- Assisting and advising the Committee in its negotiations and consultations with GOMO, creditors, and parties-in-interest relative to the administration of the Bankruptcy Case;
- Developing, negotiating, and filing a chapter 11 plan of reorganization for GOMO proposed by the Committee;
- Assisting with the Committee's investigation of the acts, conduct, assets, liabilities and financial condition of GOMO;
- Assisting and advising the Committee in its communications with the general unsecured creditor constituency regarding significant matters in the Bankruptcy Case;
- Attending meetings and negotiating with the representatives of GOMO and other parties;
- Representing the Committee at hearings and other proceedings and taking such action as is necessary to preserve and protect the rights of GOMO's unsecured creditors;
- Reviewing, analyzing and preparing applications, orders, and pleadings filed with the bankruptcy court; and
- Performing such other legal services for and on behalf of the Committee as may be necessary or appropriate to assist the Committee in satisfying its duties under § 1103 of the Bankruptcy Code.

C. Prior Applications for Compensation and Payments Received by Diamond McCarthy

12. On November 1, 2018, Diamond McCarthy filed its First Interim Application for Allowance of Compensation and Reimbursement of Expenses as Counsel for the Committee for

the Period June 4, 2018 through September 30, 2018 (the “First Interim Application”) ECF No. 58. The First Interim Application requested approval and allowance, and payment of fees on an interim basis in the amount of \$98,312.00, and reimbursement of expenses in the amount of \$2,351.81, for a total request of 100,663.81.

13. On March 25, 2019, the Court entered its Order Denying First Interim Application (the “First Fee Order”), without prejudice. ECF No. 105.

D. Diamond McCarthy’s Compensation.

14. Diamond McCarthy has not received any payments for services rendered or expenses incurred on behalf of the Committee.

15. Pursuant to the General Counsel Application and the parties’ engagement agreement, the Committee did not provide a retainer to Diamond McCarthy.

16. Further, Diamond McCarthy has no agreement or understanding with any other entity for the sharing of compensation to be received for services rendered in connection with the case.

17. This is Diamond McCarthy’s second and final request for allowance and payment of fees and expenses incurred as counsel for the Committee.

RELIEF REQUESTED

18. Diamond McCarthy has made every effort to ensure that the Application complies with the Local Rules for the Southern District of Texas and has been prepared in accordance with the *United States Trustee Appendix A—Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, dated May 17, 1996 (the “Guidelines”).

19. By this Application, Diamond McCarthy seeks the entry of an order granting (a) final allowance of compensation for the professional services rendered by Diamond McCarthy as general counsel to the Committee during the Application Period in the amount of \$227,114.00, representing 543.4 hours in attorney and paraprofessional services, and (b) reimbursement of actual and necessary expenses incurred by Diamond McCarthy during the Application Period in the amount of \$5,537.49.

NATURE AND EXTENT OF SERVICES PROVIDED BY APPLICANT

20. Diamond McCarthy has maintained detailed written records of the time expended by attorneys and paraprofessionals in the rendition of their professional services to the Committee. Such time records were generated contemporaneously with the performance of the professional services described therein and in the ordinary course of Diamond McCarthy's practice. Diamond McCarthy's hourly billing rates, as set out in **Exhibit A**, are the rates Diamond McCarthy regularly charges its hourly clients. As demonstrated by **Exhibit B**, Diamond McCarthy's attorneys are experienced in all aspects of bankruptcy matters, possess a high level of expertise, and have an excellent reputation in the business and legal communities. The individual time records were recorded by the attorney or paraprofessional who rendered the described service. Attached as **Exhibit C** are copies of the actual time records maintained by Diamond McCarthy, along with summaries of the number of hours worked and the total charges of Diamond McCarthy, separated into individual categories of services rendered during the Application Period.

21. In addition to the requirement that a description of the general services rendered by a professional be provided in a fee application, the Guidelines require that applications for compensation should include:

A description of the project, its necessity and benefit to the estate, . . . identification of each person providing services on the project; and a statement of the number of hours spent and the amount of compensation requested for each professional and paraprofessional on the project.

22. Accordingly, Diamond McCarthy established separate billing categories for use in its representation of the Committee. These distinct, numbered project billing categories enabled Diamond McCarthy to monitor its activities and appropriately account for the time expended by each professional and paraprofessional in each category. The billing records attached as Exhibits C-1 through C-5 reflect the following segregation of services rendered by billing categories:

0011	Case and Committee Administration
0013	Fee/Employment Applications/Objections
0014	Litigation
0015	Meetings/Communications with Creditors
0016	Plan and Disclosure Statement

23. Diamond McCarthy further accounted for the time expended within the various categories by delineating the amount of time expended by task. This procedure enabled Diamond McCarthy to better inform the Committee, the Court, and the U.S. Trustee regarding the nature of the services provided and time expended by its professionals.

24. To streamline and control legal fees and expenses, Diamond McCarthy has sought to minimize the expenditure of time by its partners by delegating responsibilities to associates and other paraprofessional employees, as appropriate. The blended hourly rate of all Diamond McCarthy professionals and paraprofessionals who provided services during the Application Period is \$417.95.

25. Set forth below is a summary description, by project billing category, of the services rendered by each Diamond McCarthy professional. The specific tasks undertaken by Diamond McCarthy, the number of hours devoted, and the amounts charged by each professional

or paraprofessional within each billing category are detailed in the work records attached as **Exhibit C**.

A. Case and Committee Administration – Matter 11

26. The total hours and amounts charged by Diamond McCarthy professionals and paraprofessionals to Matter 11 are 143.9 hours, representing \$55,823.00 in fees.

27. The Case and Committee Administration billing category includes all professional services related to the general representation of the Committee. Within this category, Diamond McCarthy provided the following professional services:

- Organizing the Committee by drafting its bylaws.
- Having numerous in-person, and telephonic meetings with the members of the Committee to discuss the administration of the case, pleadings filed by GOMO, information obtained from GOMO and public sources, strategy for the case, drafts of pleadings, and other related matters.
- Helping the Committee collect information including through the use of formal discovery.
- Responding to GOMO's and the U.S. Trustee office's requests for information regarding the Committee members.
- Working with the Committee members to prepare for court hearings, meetings with GOMO, and town halls.

28. While efforts were undertaken to allocate time reported in this category to other distinct categories, there may remain some identifiable services within the time records under the Case and Committee Administration billing category that could have been allocated to other categories of services.

B. Fee/Employment Applications/Objections - Matter 13

29. The total hours and amounts charged by each Diamond McCarthy professional to Matter 13 are 68.9 hours, representing \$26,606.50 in fees.

30. Diamond McCarthy professionals served the Committee by preparing an engagement letter and employment application. Diamond McCarthy also responded to GOMO's objection to Diamond McCarthy's retention in the case.

31. During the Application Period, Diamond McCarthy also expended a substantial amount of time in the preparation, filing, and defense of its First Interim Application.

C. Litigation- Matter 14

32. The total hours and amounts charged by each Diamond McCarthy professional to Matter 14 are 92.4 hours, representing \$35,156.00 in fees.

33. Diamond McCarthy professionals served the Committee by providing the following litigation-related services:

- Preparing a declaratory judgment action for the Court to address the reason for GOMO's bankruptcy filing – whether GOMO has the ability to continue collecting transfer fees in light of certain findings made by Texas state courts involving GOMO's formation as a property owner's association.
- In connection therewith, Diamond McCarthy had to perform extensive research into Texas property law and documents filed in the real property records, confer with potential witnesses, and develop its arguments and presentation for the Court.

D. Meetings/Communications with Creditors - Matter 15

34. The total hours and amounts charged by each Diamond McCarthy professional to Matter 15 are 24.3 hours, representing \$10,987.50 in fees.

35. Within this category, Diamond McCarthy professionals served the Committee by providing the following professional services:

- Advising the Committee members on how to address questions from potential creditors and homeowners in the Garden Oaks neighborhood.
- Responding to several calls from creditors and homeowners in the neighborhood.
- Preparing for and attending town halls.

E. Plan and Disclosure Statement - Matter 16

36. The total hours and amounts charged by each Diamond McCarthy professional to Matter 16 are 215.9 hours, representing \$98,541.00 in fees.

37. Within this category, Diamond McCarthy professionals served the Committee by providing the following professional services:

- Working closely with Committee members to prepare a plan term sheet;
- Preparing and filing a proposed plan and disclosure statement for GOMO on behalf of the Committee;
- Responding to objections and negotiating two amendments to the proposed plan and disclosure statement for GOMO;
- Attending and defending the Committee's proposed plan and disclosure statements.

F. Disbursements for Out-of-Pocket Expenses

38. Diamond McCarthy requests allowance and reimbursement in the amount of \$5,537.49 for reasonable, actual and necessary out-of-pocket expenses incurred while rendering professional services to the Committee during the Application Period.

39. Expenses incurred by Diamond McCarthy are set forth in detail on Exhibits C-1 through C-5 and can be summarized as follows:

Category	Amount
Outside Duplicating (at cost)	\$156.04
Subpoena Services	\$270.98
Legal Research (at cost)	\$2,943.30
Transcripts (at cost)	\$1,480.30
Postage & Delivery Services (at cost)	\$108.93
Travel, Parking & Meals (at cost)	\$227.94
Court Fees	\$350.00
	\$5,537.49

40. Diamond McCarthy submits that all expenses incurred during the Application Period were reasonable and necessary, are sought in compliance with the Guidelines, and should be allowed on an interim basis by the Court.

STANDARDS RELEVANT TO AWARDING REASONABLE COMPENSATION

41. Section 330 of the Bankruptcy Code authorizes the Court to award Diamond McCarthy reasonable compensation for its actual and necessary services rendered, and reimbursement of its actual and necessary expenses incurred in, the rendering services as general counsel to the Committee. Section 330 provides:

(a)(1) After notice to the parties in interest and to the United States Trustee and a hearing, and subject to sections 326, 328, and 329, the court may award to a trustee, a consumer privacy ombudsman appointed under section 332, an examiner, an ombudsman appointed under section 333, or a professional person employed under section 327 or 1103:

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

(B) reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a)(1).

42. Section 331 of the Bankruptcy Code authorizes the Court to award compensation on an interim basis as follows:

A trustee, an examiner, a debtor's attorney, or any professional person employed under section 327 or 1103 of this title may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered before the date of such an application or reimbursement of expenses incurred before such date as is provided under section 330 of this title. After notice and a hearing, the court may allow and disburse to such applicant such compensation or reimbursement.

11 U.S.C. § 331.

43. This Application substantiates the total amount that Diamond McCarthy seeks for fees and expenses in accordance with each element of the customary standards applied to fee applications. These standards are set forth in (i) Rule 2016 of the Federal Rules of Bankruptcy Procedure, and (ii) *In re First Colonial Corp. of America*, 544 F.2d 1291 (5th Cir. 1977), *cert. denied*, 431 U.S. 904 (1977).

44. In *First Colonial*, the Fifth Circuit adopted twelve factors to apply to the determination of awards of attorneys' fees in bankruptcy cases: (i) time and labor required; (ii) the novelty and difficulty of the questions; (iii) the skill requisite to perform the legal service properly; (iv) the preclusion of other employment by the professional due to acceptance of the case; (v) the customary fee; (vi) whether the fee is contingent or fixed; (vii) time limitations imposed by the client or the circumstances; (viii) the amount involved and the results obtained; (ix) the experience, reputation and ability of the attorneys; (x) the "undesirability" of the case; (xi) the nature and length of the professional relationship with the client; and (xii) awards in similar cases. *First Colonial*, 544 F.2d at 1298–99. These factors were taken from *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717–19 (5th Cir. 1974), a non-bankruptcy case, and are commonly referred to as the "*Johnson factors*." The original *Johnson* factors, as embraced by *First Colonial*, remain applicable to the determination of reasonableness of fees awarded under the Bankruptcy Code. 15 King, *Collier on Bankruptcy*, ¶ 330.04[3] at 330–35 to 330–41. A majority of the *Johnson* factors are now codified under Bankruptcy Code Section 330(a). *Id.* The following analysis of the *First Colonial* factors support the reasonableness of Diamond McCarthy's requested fees and expenses:

- (i) Time and labor required. The professional services rendered by Diamond McCarthy on behalf of the Committee have required the expenditure of time and effort to, among other things, draft the bylaws for the Committee, address questions from creditors and homeowners in the Garden Oaks neighborhood, and assist the Committee in conducting formal discovery on GOMO.
- (ii) Novelty and Difficulty of Legal Problems Involved. This *Johnson* factor examines the degree of novelty and difficulty of the issues encountered by Diamond McCarthy in representing the Committee. Diamond McCarthy has faced a number of difficult and complex legal issues, to wit:
 - researching and analyzing the Committee's ability to seek a preliminary injunction barring GOMO's collection of transfer fees; and
 - preparing an adversary complaint seeking a declaratory judgment that GOMO cannot continue to collect transfer fees.
- (iii) The skill requisite to perform the legal services properly. The difficult issues and matters addressed in this case required a high degree of skill and expertise. Diamond McCarthy's attorneys have been used effectively and efficiently to perform the tasks assigned to them and have provided valuable and effective assistance to the Committee.

A thorough understanding of the Bankruptcy Code and Federal Rules of Bankruptcy Procedure was necessary to provide professional services to the Committee. The compensation requested by Diamond McCarthy is consistent with the compensation awarded in other cases of similar size and complexity.
- (iv) Preclusion of other employment due to the acceptance of this case. Due to the size of Diamond McCarthy's financial restructuring department and the firm as a whole, Diamond McCarthy's representation of the Committee used time that could have been devoted for other purposes including business development and working on other client matters.
- (v) Customary Fee. Diamond McCarthy's hourly billing rates, as set out in **Exhibit A**, are the rates Diamond McCarthy regularly charges its hourly clients. The hourly rates charged by Diamond McCarthy are lower than or commensurate with the customary fees charged by professionals of similar experience, reputation and abilities in this community, as well as those rates charged regionally and nationally. Additionally, the hourly rates charged by Diamond McCarthy are consistent with the amount involved in this case, the results obtained by Diamond McCarthy, and the level of skill

necessary to perform the work. Accordingly, the fees charged by Diamond McCarthy are reasonable and customary.

No agreement exists between Diamond McCarthy and any other person, firm or entity for division or sharing of compensation in this case.

- (vi) Whether the fee is fixed or contingent. Diamond McCarthy charges customary hourly rates, as adjusted annually, for the time expended by its attorneys and paraprofessionals in representing the Committee. Diamond McCarthy's fee is not outcome-dependent.
- (vii) Time Limitations Imposed by the Client or Circumstances. Because of the time-sensitive nature of some of the matters arising in the case, Diamond McCarthy attorneys had to devote time to this case in the evenings and on weekends.
- (viii) The amount of time involved and the results obtained. Diamond McCarthy's actions in this case have assisted the Committee in efficiently fulfilling its obligations under the Bankruptcy Code. The requested compensation is reasonable in view of the time expended, the parties involved, and the results obtained in the case to date.
- (ix) The experience, reputation and ability of the professionals who performed virtually all of the services in the case. Diamond McCarthy's attorneys, over many years, have appeared throughout the United States providing legal representation to trustees, debtors, secured creditors, unsecured creditors, and committees. Further, partners of Diamond McCarthy have for many years actively participated in leadership positions in local, state and national bar associations, and have written for local and national publications and spoken at local, state and national institutes for continuing legal education in the creditors' rights and bankruptcy areas. As demonstrated by **Exhibit B**, Diamond McCarthy's attorneys are experienced in all aspects of bankruptcy matters, possess a high level of expertise, and have an excellent reputation in the business and legal communities. Furthermore, Diamond McCarthy has particular experience in the areas of complex insolvency, workout, and corporate reorganization.
- (x) Nature and Length of Professional Relationship with Client. This is Diamond McCarthy's first representation of the Committee and its members.
- (xi) The undesirability of the case. Representing the Committee is not undesirable but, as already indicated, required a significant commitment of time from Diamond McCarthy's attorneys.

- (xii) Awards in similar cases. The compensation requested in this case is comparable to, if not less than, the compensation allowed in other cases of the size and complexity of this case.

CONCLUSION

WHEREFORE, Diamond McCarthy respectfully requests (a) final allowance of compensation for professional and paraprofessional services rendered as counsel to the Committee during the Application Period in the amount of \$227,114.00; and (b) final allowance of the amount of actual and necessary out-of-pocket expenses incurred in the course of providing services as counsel to the Committee during the Application Period in the amount of \$5,537.49.

Dated: January 28, 2020

Respectfully submitted,

DIAMOND MCCARTHY LLP

By: /s/ Charles M. Rubio
TBA No. 24083768
crubio@diamondmccarthy.com
(713) 333-5127 Telephone
909 Fannin, Suite 3700
Houston, TX 77010

General Counsel to the Committee

CERTIFICATE OF SERVICE

I certify that on January 28, 2020, a true and correct copy of the foregoing document was served (i) by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas to all parties registered to receive such service; (ii) by electronic service to Randy Williams, the Chapter 7 Trustee; and (iii) by hand delivery to the Office of the U.S. Trustee. A copy of the foregoing application was also sent to chambers of The Honorable David R. Jones.

/s/ Charles M. Rubio
Charles M. Rubio

Garden Oaks Maintenance Organization, Inc.

CASE NO. 18-60018

Timekeepers and Billing Rates

ATTORNEY/ PARAPROFESSIONAL	ROLE	2018 BILLING RATE	2019 BILLING RATE
Charles M. Rubio (CMR)	Partner	\$475.00	\$525.00
Robert J. Shannon (RJS)	Associate	\$325.00	\$325.00
Michael D. Fritz	Associate	\$340.00	\$360.00
Catherine A. Burrow (CAB)	Paralegal	\$220.00	\$220.00
Adam R. Rodriguez (ARR)	Paralegal	\$220.00	\$220.00
Lisa M. Ciaccio (LMC)	Paralegal	\$145.00	\$145.00



DIAMOND MCCARTHY^{LLP}



CHARLES M. RUBIO

Partner

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Location

Houston, Texas

Education

NYU Law School (J.D.,
2007)

University of Texas (B.S.,
magna cum laude)

University of Texas
(B.B.A., *summa cum
laude*, 2003)

Areas of Practice:

Complex & High-Stakes
Litigation

- Bankruptcy, Third Party
& Professional Liability
- Settlement Counsel in
Family Law Divorce

Business Insolvency &
Restructuring

Real Estate

Admitted to Practice:

Texas

New York

Charles Rubio is a partner based in Diamond McCarthy's Houston office. He is an experienced business attorney who represents clients in a broad range of corporate, financial and real estate transactions as well as commercial disputes. Charles's practice has a special emphasis representing debtors, creditors and other parties in bankruptcy cases and out-of-court restructurings. Charles advises clients desiring to enter into sophisticated business arrangements and draws on his business and finance background to implement elegant legal solutions to complex problems. Prior to joining Diamond McCarthy, Charles was an associate in the Financial Restructuring Group in the New York office of Milbank, Tweed, Hadley and McCloy LLP.

Charles advises clients in all stages of a business life-cycle. He counsels clients on business formation issues and has worked with entrepreneurs focused on start-up companies. Charles advises growth-stage businesses in connection with negotiating and implementing financing arrangements and other capital raises. In addition, he handles a wide-range of commercial disputes including litigation involving contract disputes, breach of fiduciary duties, preference actions and fraudulent transfer claims. Charles also advises clients during the wind-down phase of a business. These representations include counseling businesses and management on their rights and responsibilities during insolvency situations and representing clients in connection with distressed asset sales and restructurings.

Representative Cases

Corporate and Finance Transactions

- Represented owner of apartment complex in a \$9.2 million refinancing and rehabilitation loan.
- Represented manufacturer in connection with a \$10 million refinancing and construction loan for a warehouse.
- Represented liquidation trustee in the establishment of a multi-million dollar litigation/liquidation trust.
- Represented co-beneficiary of trust in the establishment of a \$14 million liquidation trust.

- Represented a group of owners in the wind-down and closing of a business venture.

Commercial Litigation

- Served as lead counsel for defense of land developer in state court litigation involving claims of fraud, breach of contract and deceptive trade practices which resulted in a favorable settlement for the client.
- Served as lead counsel for the defense of limited partners in a commercial real estate dispute which resulted in a favorable settlement for the clients.
- Represented defendant in a fraudulent transfer action involving the acquisition of a company which resulted in a favorable settlement for the client.

Bankruptcy Cases

- *In re Lehman Brothers Holdings, Inc.** Counsel to Official Committee of Unsecured Creditors. Advised the client on restructurings and loan workouts involving tens of millions of dollars of real estate loans and private equity investments. Also advised the client on settlement of swap agreements.
- *In re Dreier LLP*: Counsel for the Chapter 11 trustee of Dreier LLP. Represented client in connection with hundreds of millions of dollars of claim disputes. *In re Howrey LLP*: Counsel for the Chapter 11 Trustee of Howrey LLP. Advised client in connection with lien disputes and debtor-in-possession financing issues.
- *In re Intermet Corporation.** Counsel to debtor in possession in Chapter 11 case of auto parts manufacturer. Advised client in all aspects of the restructuring process.
- *In re Land Tejas Spring Trails Ltd.*: Represented equity owners in Chapter 11 bankruptcy case involving the restructuring of a 1,000 acre master planned community in Houston, Texas and successfully confirmed chapter 11 plan which allowed owners to retain equity stake in the bankrupt entity.
- *In re Michael Glyn Brown*: Advised Chief Restructuring Officer of a medical business on fiduciary duties and business planning matters.
- *In re ATP Oil & Gas Corporation*: Successfully moved for appointment of an official committee of equity security holders.
- *In re VI Acquisition Corp. and VICORP Restaurants, Inc.** Counsel to Official Committee of Unsecured Creditors. Advised client in all aspects of the restructuring process.

* Representation occurred prior to joining Diamond McCarthy LLP.



DIAMOND MCCARTHY_{LLP}



MICHAEL D. FRITZ

Associate

(713) 333-5128

mfritz@diamondmccarthy.com

Michael is an Associate in Diamond McCarthy's Houston office. His practice focuses on complex commercial litigation, primarily in the areas of bankruptcy, insurance, and oil and gas. He also has experience handling landlord/tenant matters.

Prior to joining Diamond McCarthy, Michael served as a Law Clerk to the Honorable Marcia A. Crone, Federal District Judge, United States District Court for the Eastern District of Texas.

Location

Houston, Texas

Education

The University of Texas at Austin (J.D., *with honors*, 2012) *The Review of Litigation*, Submissions Editor

The University of Texas at Austin (B.A. in Economics and Philosophy, *with honors and Liberal Arts Honors*, 2007)

Areas of Practice:

Business Insolvency & Restructuring

Complex & High-Stakes Litigation

- Bankruptcy, Third Party & Professional Liability
- Energy & Environmental
- Breach of Contract

Admitted to Practice:

Texas

U.S. District Courts for the
Northern, Southern,
Eastern and Western
Districts of Texas



DIAMOND MCCARTHY_{LLP}



R.J. SHANNON

Associate

(713) 333-5143

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Location

Houston, Texas

Education

University of Michigan
Law School (J.D., *cum
laude*, 2013) Executive
Editor, Michigan Journal
of International Law

Towson University (B.S.
in Economics, *summa
cum laude*, 2011)

Areas of Practice:

Business Insolvency &
Restructuring

Complex & High-Stakes
Litigation

- Financial Institution
Litigation
- Bankruptcy, Third Party
& Professional Liability

Admitted to Practice:

Maryland

Texas

United States Court of

R.J. is an associate in Diamond McCarthy's Houston office. His practice is focused on complex litigation, with an emphasis on bankruptcy and business litigation. R.J. has represented debtors, official committees, corporate organizations, individual creditors, and trustees in cases under Chapters 7 and 11 of the Bankruptcy Code and related federal and state court litigation.

R.J. leverages his experience in a variety of industries, including healthcare, energy, media, technology, shipping, and real estate, to efficiently and creatively achieve his clients' litigation and restructuring objectives. Mindful of the financial considerations of his clients, R.J. works diligently to ensure that each matter is handled in a way that maximizes the expected value to his clients.

Prior to joining Diamond McCarthy, R.J. clerked for Hon. Tony Davis of the United States Bankruptcy Court for the Western District of Texas and Hon. Glenn T. Harrell, Jr. of the Court of Appeals of Maryland and was an associate with Akin Gump Strauss Hauer & Feld LLP in Dallas. Before law school, he worked for a mechanical contracting company involved in commercial construction projects in Washington, D.C.

Clerkships

- Honorable Tony M. Davis, U.S. Bankruptcy Court for the Western District of Texas (2015-2016)
- Honorable Glenn T. Harrell Jr., Court of Appeals of Maryland (2014-2015)

Representative Matters

- Debtor in International Shipholding Corporation, et al.*
- The Official Committee of Unsecured Creditors of iHeartMedia, Inc.*
- The Official Committee of Unsecured Creditors of EMAS CHIYODA Subsea Limited, et al.*
- The Official Committee of Unsecured Creditors of ADPT DFW Holdings LLC*
- Liquidating trustee in Saint Vincent Catholic Medical Centers, et al.*
- Mineral interest lessors in Linn Energy, LLC, et al.*
- Stallion Oilfield Holdings, Inc. in connection with its out-of-court restructuring*

Appeals for the Fifth
Circuit

U.S. District Courts for the
Northern, Southern,
Eastern and Western
Districts of Texas

U.S. District Court for the
District of Colorado

*Representation occurred prior to joining Diamond McCarthy LLP.

BILLING CATEGORY	ATTORNEY/ PARAPROFESSIONAL	ROLE	DATE OF FIRST ADMISSION	BILLING RATE	TOTAL TIME EXPENDED	TOTAL
CASE AND COMMITTEE	Charles M. Rubio (CMR)	Partner	Mar. 2008 (NY)	\$475.00	56.5	\$26,837.50
ADMINISTRATION	Charles M. Rubio (CMR)	Partner	Mar. 2008 (NY)	\$525.00	2.8	\$1,470.00
(MATTER 11)	Michael D. Fritz	Associate	Nov. 2012 (TX)	\$340.00	5.3	\$1,802.00
	Michael D. Fritz	Associate	Nov. 2012 (TX)	\$360.00	4.1	\$1,476.00
	Robert J. Shannon (RJS)	Associate	Dec. 2013 (MD)	\$325.00	73.7	\$23,952.50
	Catherine A. Burrow (CAB)	Paralegal	N/A	\$220.00	0.9	\$198.00
	Lisa M. Ciaccio (LMC)	Paralegal	N/A	\$145.00	0.6	\$87.00
PROFESSIONAL TOTALS					142.4	\$55,538.00
PARAPROFESSIONAL TOTALS					1.5	\$285.00
TOTAL FOR CATEGORY					143.9	\$55,823.00
FEE/EMPLOYMENT APPLICATIONS	Charles M. Rubio (CMR)	Partner	Mar. 2008 (NY)	\$475.00	15.2	\$7,220.00
OBJECTIONS	Charles M. Rubio (CMR)	Partner	Mar. 2008 (NY)	\$525.00	16.1	\$8,452.50
(MATTER 13)	Michael D. Fritz	Associate	Nov. 2012 (TX)	\$340.00	3.8	\$1,292.00
	Michael D. Fritz	Associate	Nov. 2012 (TX)	\$360.00	10.2	\$3,672.00
	Robert J. Shannon (RJS)	Associate	Dec. 2013 (MD)	\$325.00	13.6	\$4,420.00
	Catherine A. Burrow (CAB)	Paralegal	N/A	\$220.00	5.2	\$1,144.00
	Lisa M. Ciaccio (LMC)	Paralegal	N/A	\$145.00	2.8	\$406.00
PROFESSIONAL TOTALS					58.9	\$25,056.50
PARAPROFESSIONAL TOTALS					8.0	\$1,550.00
TOTAL FOR CATEGORY					66.9	\$26,606.50
LITIGATION	Charles M. Rubio (CMR)	Partner	Mar. 2008 (NY)	\$475.00	35.8	\$17,005.00
(MATTER 14)	Charles M. Rubio (CMR)	Partner	Mar. 2008 (NY)	\$525.00	1.6	\$840.00
	Michael D. Fritz	Associate	Nov. 2012 (TX)	\$340.00	0.8	\$272.00
	Robert J. Shannon (RJS)	Associate	Dec. 2013 (MD)	\$325.00	49.0	\$15,925.00
	Catherine A. Burrow (CAB)	Paralegal	N/A	\$220.00	3.3	\$726.00
	Adam R. Rodriguez (ARR)	Paralegal	N/A	\$220.00	1.5	\$330.00
	Lisa M. Ciaccio (LMC)	Paralegal	N/A	\$145.00	0.4	\$58.00
PROFESSIONAL TOTALS					87.2	\$34,042.00
PARAPROFESSIONAL TOTALS					5.2	\$1,114.00
TOTAL FOR CATEGORY					92.4	\$35,156.00
MEETING/COMMUNICATIONS	Charles M. Rubio (CMR)	Partner	Mar. 2008 (NY)	\$475.00	14.1	\$6,697.50
WITH CREDITORS	Charles M. Rubio (CMR)	Partner	Mar. 2008 (NY)	\$525.00	4.5	\$2,362.50
(MATTER 15)	Michael D. Fritz	Associate	Nov. 2012 (TX)	\$340.00	5.0	\$1,700.00
	Robert J. Shannon (RJS)	Associate	Dec. 2013 (MD)	\$325.00	0.7	\$227.50
PROFESSIONAL TOTALS					23.6	\$10,760.00
PARAPROFESSIONAL TOTALS					0.7	\$227.50
TOTAL FOR CATEGORY					24.3	\$10,987.50
PLAN & DISCLOSURE STATEMENT	Charles M. Rubio (CMR)	Partner	Mar. 2008 (NY)	\$475.00	74.3	\$35,292.50
(MATTER 16)	Charles M. Rubio (CMR)	Partner	Mar. 2008 (NY)	\$525.00	85.0	\$44,625.00
	Michael D. Fritz	Associate	Nov. 2012 (TX)	\$340.00	29.7	\$10,098.00
	Michael D. Fritz	Associate	Nov. 2012 (TX)	\$360.00	17.8	\$6,408.00
	Robert J. Shannon (RJS)	Associate	Dec. 2013 (MD)	\$325.00	1.1	\$357.50
	Catherine A. Burrow (CAB)	Paralegal	N/A	\$220.00	8.0	\$1,760.00
PROFESSIONAL TOTALS					207.9	\$96,781.00
PARAPROFESSIONAL TOTALS					8.0	\$1,760.00
TOTAL FOR CATEGORY					215.9	\$98,541.00
OUT-OF-POCKET EXPENSES						
	Outside Duplicating					\$156.04
	Subpoena Services					\$270.98
	Legal Research					\$2,943.30
	Transcripts					\$1,480.30
	Postage & Delivery Services					\$108.93
	Travel, Parking & Meals					\$227.94
	Court Fees					\$350.00
	Total Out-of-Pocket Expenses					\$5,537.49
PROFESSIONAL FEES	\$222,177.50		PROFESSIONAL HOURS			520.0
PARAPROFESSIONAL FEES	\$4,936.50		PARAPROFESSIONAL HOURS			23.4
TOTAL FEES	\$227,114.00		TOTAL HOURS			543.4
EXPENSES	\$5,537.49		AVERAGE PROFESSIONAL RATE			\$427.26
Total Fees and Expenses	\$232,651.49		AVERAGE PARAPROFESSIONAL RATE			\$210.96
			TOTAL AVERAGE RATE			\$417.95



DIAMOND McCARTHY LLP

**Two Houston Center
909 Fannin St., 37th Floor
Houston, TX 77010**

Fed. Tax I.D. #76-0631446

Official Committee of Unsecured Creditors, GOMO as Debtor
Susanna Schmidt, Co-Chair
733 W. 38th Street
Houston, TX 77018

Invoice 31579
October 16, 2018

ID: 2490-00011 - CMR

Re: Case and Committee Administration

For Services Rendered Through 9/30/2018

Current Fees	41,619.00	
Current Disbursements	2,351.81	
Total Current Charges		43,970.81
Total Due		43,970.81

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
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 Re: Case and Committee Administration

October 16, 2018
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Fee Recap

		Hours	Rate/Hour	Amount
Charles M. Rubio	Partner	36.90	475.00	17,527.50
Robert J. Shannon	Associate	73.70	325.00	23,952.50
Catherine A. Burrow	Paralegal	0.50	220.00	110.00
Lisa M. Ciaccio	Paralegal	0.20	145.00	29.00
Totals		111.30		41,619.00

Fees

Date	Atty	Description	Hours	Rate	Amount
06/04/18	CMR	Work on Committee bylaws (.4); initial organizational meeting with the Committee (2.4).	2.80	475.00	1,330.00
06/04/18	RJS	Attend meeting of Official Committee of Unsecured Creditors ("Committee") of Garden Oaks Maintenance Organization ("GOMO") (2.4); office conference regarding committee meeting after conclusion of meeting (.5).	2.90	325.00	942.50
06/04/18	LMC	Prepare Draft Committee By Laws for Garden Oaks Maintenance Organization (.1); Email Draft to C. Rubio for review (.1)	0.20	145.00	29.00
06/05/18	CMR	Prepare correspondence to J. Patterson (.2); work with R.J. Shannon on preparation of minutes (.2).	0.40	475.00	190.00
06/05/18	RJS	Review notes of 6/4 Committee meeting and post-meeting conference with C. Rubio in connection with preparation of minutes (.5); draft emails regarding same (.1); prepare committee minutes (.5); draft emails regarding same (3 x .1); schedule next two Committee meetings (.1).	1.50	325.00	487.50
06/06/18	RJS	Review bankruptcy docket (.2); communications with Clerk's office regarding notice of case (.2); register to receive email notice of filings in bankruptcy case (.1); investigate options for providing additional notice of bankruptcy and proof of claim process (1.8); prepare motion shell for use in case (.5); research options for conversion of case to chapter 7 (.9); research options for structured dismissal (1.5); office conference with C. Rubio regarding preliminary research (.1); diagram argument for 1112(b) motion (.6).	5.90	325.00	1,917.50
06/07/18	CMR	Address correspondence and attend meeting with Creditors Committee to discuss expanding Committee (.7); review meeting minutes and task list prepared by R.J. Shannon and make comments in connection with same (.6); discuss research with R.J. Shannon (.2).	1.50	475.00	712.50
06/07/18	RJS	Attention to email regarding special Committee meeting in response to H. Duran inquiry (.1); attend special Committee meeting (.3); office conference with C. Rubio after special	3.60	325.00	1,170.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
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Date	Atty	Description	Hours	Rate	Amount
06/07/18	RJS	Committee meeting regarding same (.2); draft minutes for special Committee meeting (.2); draft email to C. Rubio regarding same (.1); draft agenda for 6/11/18 Committee meeting for C. Rubio review (.5); draft detailed talking points for 6/11/18 Committee meeting (2.0); update same regarding C. Rubio comments (.2).	2.20	325.00	715.00
06/08/18	CMR	Prepare task list of essential matters to be handed in case with relevant dates (2.1); draft email to C. Rubio regarding same (.1).	1.20	475.00	570.00
06/08/18	RJS	Prepare responses to questions from G. Ingram (.8); prepare for and attend call with J. Patterson to address status of case, treatment of claims, and next steps (.4).	7.80	325.00	2,535.00
06/09/18	RJS	Office conference with C. Rubio in preparation for call with J. Patterson (.2); call with J. Patterson regarding case and requesting documents (.4); revise talking points in response to research and discussion with J. Patterson (.3); draft email to committee co-chairs regarding proposed agenda for 6/11/18 Committee Meeting (.1); research structured dismissal (4.3); begin drafting memo regarding same (2.5).	0.40	325.00	130.00
06/10/18	CMR	Attention to email from Committee co-chair G. Ingram regarding agenda and other Committee matters (.1); draft response to same (.2); attention and response to follow up email from G. Ingram (.1).	0.30	475.00	142.50
06/10/18	RJS	Prepare markup to meeting agenda and coordinate preparation of 2004 examination notice with R.J. Shannon.	7.20	325.00	2,340.00
06/11/18	CMR	Finalize memo to Committee regarding structured dismissal (5.7); finalize memo to Committee regarding conversion of case to chapter 7 (1.5).	2.80	475.00	1,330.00
06/11/18	RJS	Prepare for and attend Committee meeting (2.5); follow up with R.J. Shannon regarding same (.3).	9.00	325.00	2,925.00
06/12/18	CMR	Review emails regarding diligence items (.2); draft notice of 2004 exam regarding financial affairs of debtor (4.1); prepare for Committee meeting (.4); attend Committee meeting (1.9); office conference with C. Rubio regarding Committee meeting (.5); review notes regarding Committee meeting (.4); draft minutes of Committee meeting (.6); finalize memos regarding conversion to chapter 7 and structured dismissal (.9).	0.10	475.00	47.50
06/12/18	RJS	Correspondence with J. Patterson regarding 2004 Examination notice.	1.70	325.00	552.50
06/14/18	CMR	Review GOMO's insurance policies (.4); draft summary for C. Rubio (.5); draft summary of same for Committee (.8).	0.20	475.00	95.00
06/19/18	RJS	Review and distribute meeting minutes to the Committee members.	2.20	325.00	715.00
06/20/18	CMR	Attention to emails regarding case (3 x .1); review document the Debtor produced to Committee (1.9).	0.40	475.00	190.00
06/20/18	RJS	Review and revise committee agenda for next meeting and distribute to co-chairs for comments.	0.90	325.00	292.50
06/20/18	RJS	Prepare agenda and talking points for 6/25 Committee meeting (.9).			

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00011 - CMR
 Re: Case and Committee Administration

October 16, 2018

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Date	Atty	Description	Hours	Rate	Amount
06/25/18	RJS	Prepare for GOMO Committee meeting (.5); attend same (2.8); review and organize notes regarding same (.2); revise 2004 exam in response to Committee comments (.7).	4.20	325.00	1,365.00
06/26/18	RJS	Prepare discovery documents in form for Committee (.7); draft email to Committee regarding same (.2); prepare detailed list of matters discussed at GOMO committee meeting after C. Rubio exit, responses, and follow-up items (2.1).	3.00	325.00	975.00
06/27/18	CMR	Prepare correspondence to J. Patterson (.2), follow up with Committee members regarding same (.2).	0.40	475.00	190.00
06/27/18	RJS	Review Committee submissions to UST in response to J. Patterson request (.5); draft emails regarding same (3 x .1); revise 2019 statement regarding same (.5); draft email to C. Rubio regarding same (.1); draft letter to J. Patterson regarding Committee Concerns (2.5).	3.90	325.00	1,267.50
06/28/18	CMR	Prepare comments to Rule 2019 Disclosure (.3).	0.30	475.00	142.50
06/28/18	RJS	Emails and office conference with C. Rubio regarding 2004 exam notice (.6); emails regarding J. Patterson information requests (3 x .1); draft responsive email to J. Patterson (.3); revise 2019 statement (.1); emails with C. Rubio regarding same (2 x .1); direct filing of same (.1); file 2004 exam notice (.1); email to Committee regarding filings (.2).	1.90	325.00	617.50
06/28/18	CAB	Finalize and file committee's Rule 2019 verified statement with court (.3).	0.30	220.00	66.00
06/29/18	RJS	Attention to email from G. Ingram (.1); conference with C. Rubio regarding same (.1); draft thoughts on response for C. Rubio review (1.0); prepare summary time for committee (.6).	1.80	325.00	585.00
07/06/18	CMR	Finalize and send out proposed minutes and proposed agenda for committee meeting.	0.30	475.00	142.50
07/06/18	RJS	Prepare draft minutes of previous Committee meeting (.5); prepare draft agenda for July 9 Committee meeting (.3).	0.80	325.00	260.00
07/09/18	CMR	Work on revising agenda for committee meeting and correspondence with co-chairs in connection with same (.5); prepare for and attend committee meeting (2.2).	2.70	475.00	1,282.50
07/09/18	RJS	Prepare materials for Committee meeting (1.5); draft email to C. Rubio regarding same (.2); attend Committee meeting (2.2).	3.90	325.00	1,267.50
07/11/18	CMR	Review response to discovery request and work session with R. Shannon to prepare response to same.	0.30	475.00	142.50
07/12/18	RJS	Review response to 2004 exam by Debtor (.6); draft email to C. Rubio regarding same (.2).	0.80	325.00	260.00
07/13/18	CMR	Confer with R.J. Shannon regarding objection to 2004 and prepare correspondence to J. Patterson to try to address objections to 2004 examination.	0.20	475.00	95.00
07/19/18	CMR	Coordinate preparation of last meeting minutes with R.J. Shannon (.1).	0.10	475.00	47.50
07/20/18	RJS	Prepare minutes of previous meeting (.6); prepare agenda for	0.90	325.00	292.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00011 - CMR
 Re: Case and Committee Administration

October 16, 2018
 Invoice 31579
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Date	Atty	Description	Hours	Rate	Amount
		upcoming committee meeting (.3).			
07/23/18	CMR	Prepare document package for committee members for regular meeting (.6); prepare for and attend regular committee meeting (2.4).	3.00	475.00	1,425.00
07/23/18	RJS	Prepare for and attend Committee meeting (2.4).	2.40	325.00	780.00
07/24/18	CMR	Call with H. Duran regarding J. Patterson's email on Committee member qualifications and prepare correspondence to committee members regarding same (.8).	0.80	475.00	380.00
08/03/18	CMR	Review supplemental objection and monthly operating report and prepare correspondence to Committee members summarizing same.	0.50	475.00	237.50
08/05/18	RJS	Review statements submitted by Committee members (.5); prepare proposed draft affidavit of committee member (2.5); prepare exhibits authenticated by affidavit (.5); research standing law (4.0); draft reply to motion for preliminary injunction (2.7); prepare witness and exhibit list for preliminary injunction hearing (.5); prepare draft agenda for August 8, 2018 committee meeting (.3); prepare minutes of July 23, 2018 committee meeting (.3).	0.60	325.00	195.00
08/06/18	RJS	Prepare for and attend Committee meeting (1.5).	1.50	325.00	487.50
08/07/18	RJS	Review motion to extend exclusivity (.5); draft email to C. Rubio regarding same (.2).	0.70	325.00	227.50
08/07/18	CMR	Review motion to extend exclusivity and motion to remove committee members and prepare summary and recommendations in connection with same (.8).	0.80	475.00	380.00
08/16/18	RJS	Draft email in response to Committee member inquiry for C. Rubio review (.3); review claims docket for claims basis (.8); draft email to R. Rubio regarding same (.3).	1.40	325.00	455.00
08/20/18	RJS	Prepare draft agenda for Committee meeting (.3); prepare draft minutes of previous Committee meeting (.3).	0.60	325.00	195.00
08/20/18	CMR	Prepare for and attend regular meeting with the Committee.	1.80	475.00	855.00
08/22/18	CMR	Prepare correspondence to J. Patterson regarding proposed orders.	0.20	475.00	95.00
08/24/18	CMR	Call with H. Duran regarding status of GOMO (.2).	0.20	475.00	95.00
08/27/18	CMR	Prepare draft order regarding suspension of transfer fees (.6); follow up with M. Houston regarding survey (.2); follow up with Committee regarding survey and proposed order (.2).	0.60	475.00	285.00
08/28/18	CMR	Follow up with Albert Alanzo and Committee members on proposed order regarding suspension of collection of transfer fees (.6); confer with committee members on scheduling meeting with GOMO Board (.2); coordinate getting audio file from August 16 hearing (.2).	1.00	475.00	475.00
08/30/18	CAB	Finalize and upload proposed order regarding suspension of transfer fees to court.	0.20	220.00	44.00
09/03/18	CMR	Meeting with the Committee and prepare correspondence to J.	1.20	475.00	570.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00011 - CMR
 Re: Case and Committee Administration

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 Invoice 31579
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Date	Atty	Description	Hours	Rate	Amount
		Patterson regarding same.			
09/04/18	CMR	Multiple correspondence with J. Patterson regarding GOMO conference call and next steps.	0.80	475.00	380.00
09/05/18	CMR	Meeting with the Committee (2.0); follow up emails to J. Patterson regarding scheduling meetings and town halls (.3).	2.30	475.00	1,092.50
09/06/18	CMR	Multiple correspondence with Committee members and J. Patterson to set meeting times.	0.50	475.00	237.50
09/07/18	CMR	Call with J. Patterson regarding scheduling meetings with GOMO and town halls and outline for a plan (.8); multiple correspondence with the Committee regarding same (.4).	1.20	475.00	570.00
09/10/18	CMR	Correspondence with Committee members regarding meetings with GOMO and town halls.	0.20	475.00	95.00
09/12/18	CMR	Prepare and attend meeting with Committee (1.8); prepare minutes following same (.2).	2.00	475.00	950.00
09/13/18	CMR	Correspondence with J. Patterson to coordinate GOMO meetings and town halls.	0.30	475.00	142.50
09/17/18	CMR	Prepare for and attend meeting with GOMO Board and Committee.	2.80	475.00	1,330.00
09/18/18	CMR	Call with M. Gannon (.5); prepare for and attend status call with Committee members (1.5).	1.50	475.00	712.50
09/21/18	CMR	Prepare for and attend meeting with Committee members.	1.20	475.00	570.00
Total Fees			111.30		41,619.00

Disbursements

Date	Description	Amount
	On-Line Research	1,758.89
	Postage	39.03
07/31/18	Court Fees; COURTS - filing fee for Adversary 06/28/2018/Inv. 07062018; American Express	350.00
07/31/18	Delivery Services; to US Trustee, 515 Rusk, Houston, TX 77002 07/02/2018/Inv. 46340; Mach 5 Couriers, Inc.	12.95
07/31/18	Copy Services; prints with tabs placed in 1/2 inch binders for 5 sets of witness binders 08/07/2018/Inv. 5811; LP P143	156.04
08/30/18	Local Travel Expense; R. Shannon parking for hearing on Preliminary Injunction 08/09/2018/Inv. 08302018; Robert Shannon	12.00
09/11/18	Delivery Services; from Harris County, 201 Caroline, 3rd Floor, Houston, TX 08/09/2018/Inv. 46685; Mach 5 Couriers, Inc.	16.95
09/25/18	Travel Expense; C. Rubio car fare to courthouse for Motion for Preliminary Injunction hearing on 08/09/2018/Inv. 09252018; Charles M. Rubio	5.95
Total Disbursements		2,351.81

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
I.D. 2490-00011 - CMR
Re: Case and Committee Administration

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Total Fees and Disbursements	43,970.81
Total Current Charges	43,970.81

The above amount may not include third party expenses for which we have not yet been billed.
REMITTANCE WITHIN 20 DAYS IS APPRECIATED


DIAMOND McCARTHY_{LLP}

**Two Houston Center
909 Fannin St., 37th Floor
Houston, TX 77010**

Fed. Tax I.D. #76-0631446

Official Committee of Unsecured Creditors, GOMO as Debtor
Gary Ingram, Co-Chair
ingram.gary@gmail.com

Invoice 33446
October 21, 2019

ID: 2490-00011 - CMR

Re: Case and Committee Administration

For Services Rendered Through 9/30/2019

Balance Forward		43,970.81
Current Fees	14,204.00	
Current Disbursements	3,185.68	
Total Current Charges		17,389.68
Total Due		61,360.49

Open Invoices				
Invoice Date	Invoice Number	Original Amount	Payments and Credits	Balance
10/16/18	31579	43,970.81	0.00	43,970.81
Totals		43,970.81	0.00	43,970.81

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00011 - CMR
 Re: Case and Committee Administration

October 21, 2019
 Invoice 33446
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Fee Recap

		Hours	Rate/Hour	Amount
Charles M. Rubio	Partner	19.60	475.00	9,310.00
Charles M. Rubio	Partner	2.80	525.00	1,470.00
Michael D. Fritz	Associate	5.30	340.00	1,802.00
Michael D. Fritz	Associate	4.10	360.00	1,476.00
Catherine A. Burrow	Paralegal	0.40	220.00	88.00
Lisa M. Ciaccio	Paralegal	0.40	145.00	58.00
Totals		32.60		14,204.00

Fees

Date	Atty	Description	Hours	Rate	Amount
10/01/18	CMR	Prepare for and attend town hall.	2.50	475.00	1,187.50
10/04/18	CMR	Coordinate next meeting with Patterson and Committee.	0.30	475.00	142.50
10/08/18	MDF	Discussion with C. Rubio regarding status of GOMO case.	0.40	340.00	136.00
10/09/18	CMR	Call with P. Chang regarding next steps in plan negotiations and coordinate next Committee meeting.	0.50	475.00	237.50
10/23/18	CMR	Prepare for and attend meeting with committee.	3.60	475.00	1,710.00
10/25/18	CMR	Work on presentation for status conference (4.8); attend status conference (1.0); follow up meeting with Committee regarding same (1.0).	6.80	475.00	3,230.00
10/29/18	CMR	Follow up with P. Chang and J. Patterson regarding audio for status conference.	0.20	475.00	95.00
11/01/18	LMC	Finalize and file Proposed Order Extending Exclusivity and Setting Hearing to Conditionally Approve in both the main case and the adversary case.	0.40	145.00	58.00
11/05/18	CMR	Review and provide comments to proposed correspondence from G. Ingram to K. Noser.	0.50	475.00	237.50
11/06/18	CMR	Follow up with G. Ingram regarding questions on new committee to discuss amendment to deed restrictions.	0.40	475.00	190.00
11/26/18	CMR	Correspondence with Committee members to organize meeting and follow up in connection with Debtor's retention of POA counsel.	0.60	475.00	285.00
11/27/18	CMR	Prepare for and attend meeting with Committee (1.6); prepare follow up email to J. Patterson regarding budget and plan formulation (.7).	2.30	475.00	1,092.50
11/28/18	CMR	Review proposed budget from GOMO and prepare correspondence to Committee members regarding changes in the proposed budget and recommendation regarding same.	0.70	475.00	332.50
11/29/18	CMR	Address comments from Committee members regarding the chapter 11 plan formulation process, email J. Patterson to set up	0.90	475.00	427.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
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 Re: Case and Committee Administration

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Date	Atty	Description	Hours	Rate	Amount
		call to discuss plan, review proposed correspondence from Committee members to GOMO board members regarding the plan formulation process and provide comments to same.			
12/12/18	MDF	Meeting with Committee to review revised bylaws.	4.90	340.00	1,666.00
01/31/19	CMR	Correspondence with G. Ingram and other committee members regarding the constitution of committee.	0.30	475.00	142.50
02/04/19	CMR	Correspondence with S. Schmidt and H. Duran regarding Schmidt's resignation from the Committee.	0.20	525.00	105.00
02/05/19	CMR	Prepare markups to draft communications to creditors to provide information on bankruptcy case including relevant upcoming deadlines.	0.70	525.00	367.50
02/08/19	CMR	Provide update to Committee regarding S. Schmidt's resignation and communications with H. Duran regarding same (.3); provide response to H. Duran regarding Committee's constituency (.2).	0.50	525.00	262.50
02/15/19	CMR	Address correspondence from S. Schmidt regarding her resignation from the Committee.	0.20	525.00	105.00
02/21/19	MDF	Participate in call with Committee and Nina Tran.	1.00	360.00	360.00
02/28/19	CMR	Address questions from Committee members regarding the administration of the case and the governance of GOMO.	0.60	525.00	315.00
03/05/19	MDF	Participate in call with Committee members regarding case status and strategy (3.0); review changes to deed restrictions and by-laws (.1).	3.10	360.00	1,116.00
05/07/19	CAB	Finalize and file witness and exhibit list for 5/9/19 hearing.	0.30	220.00	66.00
05/17/19	CAB	Receive, download and forward transcript of 5/9/19 hearing to C. Rubio.	0.10	220.00	22.00
06/05/19	CMR	Correspondence with committee members regarding outstanding monthly operating reports (.2); prepare email to H. Duran regarding same (.1); collect fee information per request from J. Patterson and send to J. Patterson (.3).	0.60	525.00	315.00
Total Fees			32.60		14,204.00

Disbursements

Date	Description	Amount
	On-Line Research	1,184.41
	Postage	40.00
01/29/19	Work Session Food; C. Rubio meal with GOMO committee 12/05/2018/Inv. 01212019-1; Charles M. Rubio	168.56
01/29/19	Work Session Food; C. Rubio meal with GOMO committee 12/03/2018/Inv. 01212019-1; Charles M. Rubio	23.49
04/17/19	Work Session Food; C. Rubio work through lunch with M. Fritz 03/19/2019/Inv. 03192019; Charles M. Rubio	17.94
04/29/19	Transcripts; Original and 1 copy of transcripts for deposition of Alvin L. Thomas on 04/04/2019/Inv. M-245492; EPIQ Court Reporting	651.60

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto

October 21, 2019

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Re: Case and Committee Administration

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Date	Description	Amount
05/28/19	Transcripts; transcripts of the hearing on 03/19/2019/Inv. 60328; Mary D. Henry	471.75
07/03/19	Subpoena Service; Rush subpoena processing services 08/03/2019/Inv. 1305807; Lexitas	85.00
07/03/19	Subpoena Service; rush subpoena service 08/03/2018/Inv. 1305806; Lexitas	185.98
08/16/19	Transcripts; one copy of transcripts for the hearing on 05/09/2019/Inv. 60321; Mary D. Henry	356.95
Total Disbursements		3,185.68

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto
I.D. 2490-00011 - CMR
Re: Case and Committee Administration

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Total Fees and Disbursements	17,389.68
Total Current Charges	17,389.68
Balance Forward	43,970.81
Total Amount Due	61,360.49

The above amount may not include third party expenses for which we have not yet been billed.

REMITTANCE WITHIN 20 DAYS IS APPRECIATED



DIAMOND McCARTHY LLP

**Two Houston Center
909 Fannin St., 37th Floor
Houston, TX 77010**

Fed. Tax I.D. #76-0631446

Official Committee of Unsecured Creditors, GOMO as Debto
Susanna Schmidt, Co-Chair
733 W. 38th Street
Houston, TX 77018

Invoice 31580
October 16, 2018

ID: 2490-00013 - CMR

Re: Fee/Employment Applications/Objections

For Services Rendered Through 9/30/2018

Current Fees	7,656.50	
Total Current Charges		7,656.50
Total Due		7,656.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00013 - CMR
 Re: Fee/Employment Applications/Objections

October 16, 2018
 Invoice 31580
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Fee Recap

		Hours	Rate/Hour	Amount
Charles M. Rubio	Partner	5.60	475.00	2,660.00
Robert J. Shannon	Associate	13.60	325.00	4,420.00
Catherine A. Burrow	Paralegal	1.50	220.00	330.00
Lisa M. Ciaccio	Paralegal	1.70	145.00	246.50
Totals		22.40		7,656.50

Fees

Date	Atty	Description	Hours	Rate	Amount
06/05/18	CMR	Work on engagement letter and finalize (.3).	0.30	475.00	142.50
06/05/18	RJS	Review precedent documents of UCC engagement letters (.2); review United States Trustee requirements for retention of professionals (.2); draft engagement letter for Diamond McCarthy's retention by Committee (1.8); emails regarding same (2 x .1).	2.40	325.00	780.00
06/06/18	CMR	Address questions from Committee members regarding retention (.8); office conference with R. Shannon (.1).	0.90	475.00	427.50
06/12/18	LMC	Set up and upload Engagement Agreement to the Docusign system in order to obtain electronic signatures from members (.2).	0.20	145.00	29.00
06/26/18	RJS	Draft Diamond McCarthy retention application (3.6).	3.60	325.00	1,170.00
06/29/18	CMR	Work with accounting group to prepare fee statement for the committee members review (.5).	0.50	475.00	237.50
07/05/18	RJS	Draft email to C. Rubio regarding Diamond McCarthy retention application (.1); revise same in response to comments (3.1); emails regarding applicability of certain provisions (2 x .1); file same (.2); prepare draft note to Committee members (.2).	3.80	325.00	1,235.00
07/10/18	RJS	Attention to Debtor's objection regarding DM retention (.3); draft email to C. Rubio regarding same (.1); review service list requirements (.2); draft email to L. Ciaccio regarding same (.1); draft supplemental to retention application (1.7); draft revised proposed order (.2); draft email to C. Rubio regarding same (.1).	2.70	325.00	877.50
07/12/18	CMR	Work on supplement to Diamond McCarthy retention application.	0.60	475.00	285.00
07/15/18	LMC	Gather and upload Supplement to Retention Application to Docusign for Gary Ingram and Sue Schmidt to sign and return (.3).	0.30	145.00	43.50
07/18/18	LMC	Review and upload Supplement to Retention Application to Docusign for client signatures(.2).	0.20	145.00	29.00
07/19/18	CMR	Work on and finalize supplement to the retention application and revised proposed order (.3).	0.30	475.00	142.50
07/19/18	LMC	Finalize and file Notice of Revised Proposed Order for the Official Committee of Unsecured Creditors' Application to Employ Diamond McCarthy LLP as Counsel Nunc Pro Tunc to June 4,	0.50	145.00	72.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00013 - CMR
 Re: Fee/Employment Applications/Objections

October 16, 2018
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Date	Atty	Description	Hours	Rate	Amount
		2018 (.3); finalize and file Supplement to the Official Committee of Unsecured Creditors' Application to Employ Diamond McCarthy (.2).			
08/02/18	CMR	Review supplemental objection to DM employment application and begin outlining response to same and calls to address background on same (1.2).	1.20	475.00	570.00
08/03/18	LMC	Research court records to review and download Supplement to Objection to the Official Committee of Unsecured Creditors' Application to Employ Diamond McCarthy LLP as Counsel Nunc Pro Tunc to June 4, 2018 (.3) Assemble and forward same to C. Rubio (.2).	0.50	145.00	72.50
08/07/18	RJS	Prepare supplemental declaration of C. Rubio regarding objection to retention of Diamond McCarthy (.8); prepare email to C. Rubio regarding same (.1); finalize W&E list (.2).	1.10	325.00	357.50
08/07/18	CMR	Work on supplemental declaration in connection with retention application (.6).	0.60	475.00	285.00
08/08/18	CAB	Review Debtor's objections to Committee's employment of Diamond McCarthy and prepare summary spreadsheet of same to be used in response (.8); prepare draft response to Debtor's objection to motion to approve employment of Diamond McCarthy and forward to C. Rubio (.7).	1.50	220.00	330.00
08/08/18	CMR	Work on response to DM retention application objection (.6); work on supplemental declaration in connection with same (.6).	1.20	475.00	570.00
Total Fees			22.40		7,656.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto
I.D. 2490-00013 - CMR
Re: Fee/Employment Applications/Objections

October 16, 2018
Invoice 31580
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Total Fees and Disbursements	7,656.50
Total Current Charges	7,656.50

*The above amount may not include third party expenses for which we have not yet been billed.
REMITTANCE WITHIN 20 DAYS IS APPRECIATED*


DIAMOND McCARTHY_{LLP}

**Two Houston Center
909 Fannin St., 37th Floor
Houston, TX 77010**

Fed. Tax I.D. #76-0631446

Official Committee of Unsecured Creditors, GOMO as Debtor
Gary Ingram, Co-Chair
ingram.gary@gmail.com

Invoice 33447
October 21, 2019

ID: 2490-00013 - CMR

Re: Fee/Employment Applications/Objections

For Services Rendered Through 9/30/2019

Balance Forward		7,656.50
Current Fees	18,950.00	
Total Current Charges		18,950.00
Total Due		26,606.50

Open Invoices				
Invoice Date	Invoice Number	Original Amount	Payments and Credits	Balance
10/16/18	31580	7,656.50	0.00	7,656.50
Totals		7,656.50	0.00	7,656.50

Invoice Date	Invoice Number	Original Amount	Payments and Credits	Balance
10/16/18	31580	7,656.50	0.00	7,656.50
Totals		7,656.50	0.00	7,656.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00013 - CMR
 Re: Fee/Employment Applications/Objections

October 21, 2019
 Invoice 33447
 Page 2

Fee Recap

		Hours	Rate/Hour	Amount
Charles M. Rubio	Partner	9.60	475.00	4,560.00
Charles M. Rubio	Partner	16.10	525.00	8,452.50
Michael D. Fritz	Associate	3.80	340.00	1,292.00
Michael D. Fritz	Associate	10.20	360.00	3,672.00
Catherine A. Burrow	Paralegal	3.70	220.00	814.00
Lisa M. Ciaccio	Paralegal	1.10	145.00	159.50
Totals		44.50		18,950.00

Fees

Date	Atty	Description	Hours	Rate	Amount
10/09/18	CMR	Collect information for M. Fritz to prepare first interim fee application.	0.20	475.00	95.00
10/10/18	CMR	Work on preparing narratives for the first interim fee application.	0.80	475.00	380.00
10/10/18	LMC	Draft Exhibit C - Fees and Expenses breakdown for the First Interim Fee Application.	0.50	145.00	72.50
10/11/18	MDF	Draft fee application of Diamond McCarthy as general counsel to the Committee.	2.50	340.00	850.00
10/16/18	LMC	Update Exhibit C to include amounts billed per matter.	0.20	145.00	29.00
10/16/18	CMR	Meeting with members of the Committee (2.0); follow up with M. Fritz regarding same to discuss status conference (.7).	2.70	475.00	1,282.50
11/01/18	CMR	Finalize Diamond McCarthy's first interim fee application.	0.80	475.00	380.00
11/01/18	LMC	Finalize and file Diamond McCarthy's First Interim Application for Compensation for the period of June 4, 2017 through September 30, 2018.	0.40	145.00	58.00
11/20/18	CMR	Address S. Boyd retention issue and send J. Patterson email regarding same.	0.50	475.00	237.50
11/28/18	MDF	Draft reply to Debtor's objection to Diamond McCarthy's first fee statement.	1.30	340.00	442.00
12/02/18	CMR	Prepare email to Committee members regarding Boyd application (.8); finalize response to objection to Diamond McCarthy fee application and circulate for comments (.7).	1.50	475.00	712.50
01/07/19	CMR	Contact Albert Alanzo to schedule hearing on Diamond McCarthy first interim fee application (.1); work with C. Burrow to prepare notice of hearing in connection with same (.2).	0.30	475.00	142.50
01/21/19	CMR	Correspondence with committee members regarding interview process for prospective candidates for special HOA counsel.	0.90	475.00	427.50
01/22/19	CMR	Call with S. Conney (Grey Reed) regarding potential representation of the Committee as special HOA counsel.	0.80	475.00	380.00
01/30/19	CAB	Prepare draft application for committee to employ Hoover	1.40	220.00	308.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor

October 21, 2019

I.D. 2490-00013 - CMR

Invoice 33447

Re: Fee/Employment Applications/Objections

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Date	Atty	Description	Hours	Rate	Amount
		Slovacek as special counsel together with proposed order; forward to C. Rubio.			
01/31/19	CMR	Begin to review draft of Hoover Slovacek retention application (.5); call with M. Haselden and D. Brown regarding same (.4); follow up correspondence with G. Ingram regarding same (.2).	1.10	475.00	522.50
02/01/19	CMR	Correspondence with N. Tran regarding instructions for completing her affidavit in connection with retention application.	0.20	525.00	105.00
02/06/19	CMR	Prepare comments to draft retention application for Hoover Slovacek and proposed order regarding same (.7); correspondence with Committee and N. Tran regarding same (.2).	0.90	525.00	472.50
02/07/19	CMR	Call with Nina Tran regarding retention process.	0.50	525.00	262.50
02/08/19	CMR	Provide update to Committee members regarding N. Tran retention and documents related to same (.2); work on finalizing and filing Hoover Slovacek retention application and multiple correspondence with G. Ingram, Nina Tran and Cathy Burrow regarding same (1.4); follow up with A. Alanzo to schedule hearing date for Hoover Slovacek retention application (.1).	1.70	525.00	892.50
02/28/19	CAB	Prepare summary tables and exhibits to be used with second interim fee application and forward to C. Rubio.	1.20	220.00	264.00
02/28/19	CMR	Work on exhibits for second interim fee application (.8); prepare correspondence to Committee members detailing time and expenses for the second interim fee application period (.5)	1.30	525.00	682.50
03/01/19	CAB	Finalize and file Amended Rule 2014 Affidavit of N. Tran in support of application to employ Hoover Slovacek.	0.30	220.00	66.00
03/01/19	CMR	Coordinate filing of amended Tran affidavit.	0.10	525.00	52.50
03/07/19	CAB	Finalize and file notice of hearing on Diamond McCarthy's first interim fee application.	0.30	220.00	66.00
03/07/19	CMR	Prepare comments on notice of hearing for first interim fee application and coordinate filing of same (.2); call with G. Ingram to discuss budget for plan and outstanding plan issues (1.0).	1.20	525.00	630.00
03/14/19	CAB	Prepare draft witness and exhibit list for hearing on approval of Diamond McCarthy's first interim fee application.	0.50	220.00	110.00
03/15/19	CMR	Finalize witness and exhibit list for hearing on Diamond McCarthy's first interim fee application (.3); calls and correspondence with P. Chang regarding same (.5); correspondence with the Committee to prepare for Tuesday hearing (.3), review Debtor's witness and exhibit list to prepare for hearing (.1); prepare opening arguments for hearing and review reply in connection with same (.8); work on direct examination for hearing (.8).	2.80	525.00	1,470.00
03/17/19	CMR	Work with M. Fritz to prepare for the interim compensation hearing.	0.80	525.00	420.00
03/17/19	MDF	Call with C. Rubio regarding upcoming fee application hearing.	0.10	360.00	36.00
03/18/19	CMR	Work on preparing for hearing to consider approval of Diamond McCarthy's first interim fee application.	0.80	525.00	420.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto
 I.D. 2490-00013 - CMR
 Re: Fee/Employment Applications/Objections

October 21, 2019
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Date	Atty	Description	Hours	Rate	Amount
03/18/19	MDF	Create question and answer outline for direct examination of C. Rubio.	2.50	360.00	900.00
03/19/19	MDF	Ensure that exhibit binders and support materials are prepared (.5); prepare for hearing on fee application (2.8); attend hearing on Diamond McCarthy's fee application (4.3).	7.60	360.00	2,736.00
03/19/19	CMR	Prepare for and attend hearing on first interim fee application.	5.80	525.00	3,045.00
Total Fees			44.50		18,950.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto
I.D. 2490-00013 - CMR
Re: Fee/Employment Applications/Objections

October 21, 2019
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Total Fees and Disbursements	18,950.00
Total Current Charges	18,950.00
Balance Forward	7,656.50
Total Amount Due	26,606.50

The above amount may not include third party expenses for which we have not yet been billed.

REMITTANCE WITHIN 20 DAYS IS APPRECIATED



DIAMOND McCARTHY LLP

**Two Houston Center
909 Fannin St., 37th Floor
Houston, TX 77010**

Fed. Tax I.D. #76-0631446

Official Committee of Unsecured Creditors, GOMO as Debto
Susanna Schmidt, Co-Chair
733 W. 38th Street
Houston, TX 77018

Invoice 31581
October 16, 2018

ID: 2490-00014 - CMR

Re: Litigation

For Services Rendered Through 9/30/2018

Current Fees	32,819.50	
Total Current Charges		32,819.50
Total Due		32,819.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00014 - CMR
 Re: Litigation

October 16, 2018

Invoice 31581

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Fee Recap

		Hours	Rate/Hour	Amount
Charles M. Rubio	Partner	33.50	475.00	15,912.50
Robert J. Shannon	Associate	49.00	325.00	15,925.00
Catherine A. Burrow	Paralegal	2.70	220.00	594.00
Adam R. Rodriguez	Paralegal	1.50	220.00	330.00
Lisa M. Ciaccio	Paralegal	0.40	145.00	58.00
Totals		87.10		32,819.50

Fees

Date	Atty	Description	Hours	Rate	Amount
06/20/18	RJS	Draft complaint for declaratory judgment and permanent injunction (5.5); draft motion for temporary restraining order (4.4).	9.90	325.00	3,217.50
06/21/18	RJS	Continue to revise and edit complaint and temporary restraining order (3.0); draft email to C. Rubio regarding same (.2).	3.20	325.00	1,040.00
06/22/18	CMR	Review draft of adversary complaint and motion for injunction regarding transfer fees (.8); prepare package of materials for committee meeting (.3).	1.10	475.00	522.50
06/25/18	RJS	Revise adversary complaint in response to Committee comments (.9); revise TRO in response to Committee comments (.9).	1.80	325.00	585.00
06/26/18	CMR	Work on revised 2004 Examination request and review revisions to the draft complaint and motion for TRO and send to J. Patterson.	0.50	475.00	237.50
06/27/18	CMR	Coordinate filing of the complaint with R.J. Shannon (.1).	0.10	475.00	47.50
06/28/18	CMR	Call with G. Ingram regarding use of an expert (.4); call with S. Schmidt regarding use of an expert and other issues (.5).	0.90	475.00	427.50
06/28/18	RJS	Final review and preparation of filing adversary complaint and preliminary injunction motion (.5); direct filing of adversary complaint (.2).	0.70	325.00	227.50
06/28/18	CAB	Prepare adversary cover sheet and draft summons to accompany adversary filing; finalize and file adversary complaint and request for issuance of summons (.8); email to counsel for Debtor forwarding courtesy copies of filings (.1).	0.90	220.00	198.00
07/17/18	CAB	Conference with R.J. Shannon regarding service of summons and complaint; serve same and prepare certificate of service; file certificate of service with court.	0.50	220.00	110.00
07/19/18	CMR	Conference with M. Beatty to discuss potential D&O claims and review policy regarding same (.7); address discovery and 2004 matters including appearance of J. Patterson in my office and follow up in connection with same (.5).	1.20	475.00	570.00
07/24/18	CAB	Prepare, finalize, file and serve notice of hearing on motion for preliminary injunction; request issuance of new summons to be served at request of R. Shannon.	0.50	220.00	110.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00014 - CMR
 Re: Litigation

October 16, 2018
 Invoice 31581
 Page 3

Date	Atty	Description	Hours	Rate	Amount
07/24/18	CMR	Schedule a hearing on motion for preliminary injunction (.2); prepare email to Committee regarding status of preliminary injunction hearing and discovery disputes (.3).	0.50	475.00	237.50
07/25/18	RJS	Prepare subpoena regarding PI hearing (1.2); prepare substitute summons (.6).	1.80	325.00	585.00
07/27/18	CMR	Prepare email to Committee members on proposed steps for preparing for hearing on the preliminary injunction (3); coordinate with R. J. Shannon on subpoenas and affidavits for hearing (.3).	0.60	475.00	285.00
07/27/18	RJS	Draft email to C. Rubio regarding revised subpoena (.1); draft second subpoena (.7); draft email regarding same to C. Rubio (.2); further revisions (.2); draft email to C. Rubio regarding draft email to Committee regarding affidavit (.1); follow up email regarding subpoena (.1); attention to issue with summons in adversary proceeding (.4); draft new summons (.2); draft emails to C. Rubio regarding same (2 x .1).	2.20	325.00	715.00
08/02/18	RJS	Review and research potential service issue (.8); prepare substitute summons (.2); direct service of same (.5); draft email to C. Rubio regarding issue (.2); analyze and draft detailed email regarding evidence matters in advance of preliminary injunction hearing (2.4).	4.10	325.00	1,332.50
08/02/18	ARR	Coordinate service of subpoenas upon W. Barclay.	1.50	220.00	330.00
08/02/18	CMR	Work on finalizing subpoenas for preliminary injunction hearing (.3).	0.30	475.00	142.50
08/04/18	RJS	Prepare exhibits for preliminary injunction hearing (3.8).	3.80	325.00	1,235.00
08/05/18	RJS	Review statements submitted by Committee members (.5); prepare proposed draft affidavit of committee member (2.5); prepare exhibits authenticated by affidavit (.5); research standing law (4.0); draft reply to motion for preliminary injunction (2.7); prepare witness and exhibit list for preliminary injunction hearing (.5).	10.70	325.00	3,477.50
08/06/18	RJS	Office conference with C. Rubio regarding evidence (.4); additional evidence research and revise witness and exhibit list in anticipation for hearing on preliminary injunction (2.1).	2.50	325.00	812.50
08/06/18	CMR	Meeting with creditors committee to discuss hearing on preliminary injunction and related matters (1.4); review GOMO website for exhibits for hearing on preliminary injunction motion (.8); work with R. J. Shannon to collect and prepare exhibits (.8); work on witness outlines for hearing on preliminary injunction (1.5).	4.50	475.00	2,137.50
08/07/18	RJS	Further research on standing issues (.5).	0.50	325.00	162.50
08/07/18	CMR	Meeting with P. Chang to discuss hearing preparation (2.2); work on hearing script including reviewing exhibits (.5).	2.70	475.00	1,282.50
08/08/18	CAB	Finalize and file Committee's reply in support of motion for preliminary injunction (.3).	0.30	220.00	66.00
08/08/18	CMR	Prepare for hearing on preliminary injunction motion including	2.20	475.00	1,045.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00014 - CMR
 Re: Litigation

October 16, 2018
 Invoice 31581
 Page 4

Date	Atty	Description	Hours	Rate	Amount
08/09/18	LMC	reviewing exhibits and rules of evidence for admissibility issues (.8); meeting with C. Lambright to discuss hearing and underlying legal issues with the petition for formation (1.4).	0.40	145.00	58.00
08/09/18	RJS	Draft Supplemental Witness & Exhibit List for Hearing on Motion for Preliminary Injunction (.1); Finalize and file Supplemental Witness & Exhibit list with the Southern District Bankruptcy Court (.1); Gather additional exhibits and update Hearing binders with same (.2).	3.50	325.00	1,137.50
08/09/18	CMR	Research regarding FRCP 615 (1.5); attend hearing regarding preliminary injunction (1.6); post-hearing Committee meeting (.4).	7.50	475.00	3,562.50
08/10/18	CMR	Work on GOMO representative witness outline (1.2); work on presentation for court (1.1); work on Peter Chang witness outline (.5); work on Casey Lambright witness outline (.5), prepare for and attend hearing (1.5); follow up meeting with H. Duran (.2); follow up meeting with Creditors Committee to discuss results of hearing and next steps (1.0); prepare proposed order and circulate to committee for comments and review law and precedents in connection with same (1.5).	0.50	475.00	237.50
08/15/18	CAB	Finalize proposed order in response to preliminary injunction hearing including taking Debtor's comments, sending them to Committee for approval and submitting to court.	0.50	220.00	110.00
08/15/18	CMR	Assemble and prepare exhibits to C. Rubio's affidavit to be filed in support of legal argument; revise and finalize same to include additional exhibits designated; finalize and file affidavit of C. Rubio with all exhibits.	3.10	475.00	1,472.50
08/16/18	RJS	Prepare for hearing on effects of Chang including reviewing underlying real estate filings (1.4); prepare document affidavit in connection with same (1.1); calls and correspondence with James Henderson (Title Houston Holdings) regarding documents filed in the real property records (.6).	4.30	325.00	1,397.50
08/16/18	CMR	Prepare for hearing regarding legal effect (1.5); attend same and Committee debriefing (2.8).	7.80	475.00	3,705.00
		Prepare Powerpoint for presentation in Court and prepare script (2.7); review exhibits and prepare for admission issues (.8); prepare for and attend hearing and follow up in connection with same including preparation of email to J. Patterson (4.3).			
Total Fees			87.10		32,819.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto
I.D. 2490-00014 - CMR
Re: Litigation

October 16, 2018
Invoice 31581
Page 5

Total Fees and Disbursements	32,819.50
Total Current Charges	32,819.50


DIAMOND McCARTHY_{LLP}

**Two Houston Center
909 Fannin St., 37th Floor
Houston, TX 77010**

Fed. Tax I.D. #76-0631446

Official Committee of Unsecured Creditors, GOMO as Debto
Gary Ingram, Co-Chair
ingram.gary@gmail.com

Invoice 33448
October 21, 2019

ID: 2490-00014 - CMR

Re: Litigation

For Services Rendered Through 9/30/2019

Balance Forward		32,819.50
Current Fees	2,336.50	
Total Current Charges		2,336.50
Total Due		35,156.00

Open Invoices				
Invoice Date	Invoice Number	Original Amount	Payments and Credits	Balance
10/16/18	31581	32,819.50	0.00	32,819.50
Totals		32,819.50	0.00	32,819.50

Invoice Date	Invoice Number	Original Amount	Payments and Credits	Balance
10/16/18	31581	32,819.50	0.00	32,819.50
Totals		32,819.50	0.00	32,819.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto
 I.D. 2490-00014 - CMR
 Re: Litigation

October 21, 2019
 Invoice 33448
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Fee Recap

		Hours	Rate/Hour	Amount
Charles M. Rubio	Partner	2.30	475.00	1,092.50
Charles M. Rubio	Partner	1.60	525.00	840.00
Michael D. Fritz	Associate	0.80	340.00	272.00
Catherine A. Burrow	Paralegal	0.60	220.00	132.00
Totals		5.30		2,336.50

Fees

Date	Atty	Description	Hours	Rate	Amount
10/24/18	MDF	Discussion with C. Rubio regarding strategy for upcoming hearing.	0.80	340.00	272.00
10/24/18	CMR	Call with J. Patterson to prepare for status conference (1.5); work on presentation for status conference (.8).	2.30	475.00	1,092.50
04/01/19	CAB	Finalize and file notice of deposition and interrogatories to debtor (.3); email to J. Patterson forwarding documents filed and requesting acceptance of service (.1); coordinate arrangements for court reporter (.2).	0.60	220.00	132.00
04/03/19	CMR	Confer with J. Patterson on deposition schedule (.1); review Rule 33 in connection with informal objection raised by the Debtor to the interrogatories (.2); respond to J. Patterson with respect to the interrogatories and approach for resolving same (.4); prepare witness outline for GOMO corporate representative (.9).	1.60	525.00	840.00
Total Fees			5.30		2,336.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto
I.D. 2490-00014 - CMR
Re: Litigation

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Total Fees and Disbursements	2,336.50
Total Current Charges	2,336.50
Balance Forward	32,819.50
Total Amount Due	35,156.00

The above amount may not include third party expenses for which we have not yet been billed.

REMITTANCE WITHIN 20 DAYS IS APPRECIATED



DIAMOND McCARTHY LLP

**Two Houston Center
909 Fannin St., 37th Floor
Houston, TX 77010**

Fed. Tax I.D. #76-0631446

Official Committee of Unsecured Creditors, GOMO as Debto
Susanna Schmidt, Co-Chair
733 W. 38th Street
Houston, TX 77018

Invoice 31582
October 16, 2018

ID: 2490-00015 - CMR

Re: Meetings/Communications with Creditors

For Services Rendered Through 9/30/2018

Current Fees	6,925.00	
Total Current Charges		6,925.00
Total Due		6,925.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00015 - CMR
 Re: Meetings/Communications with Creditors

October 16, 2018
 Invoice 31582
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Fee Recap

		Hours	Rate/Hour	Amount
Charles M. Rubio	Partner	14.10	475.00	6,697.50
Robert J. Shannon	Associate	0.70	325.00	227.50
Totals		14.80		6,925.00

Fees

Date	Atty	Description	Hours	Rate	Amount
06/25/18	CMR	Review and mark up proposed letter to creditors (.8); attend regular committee meeting (partial) (1.8).	2.60	475.00	1,235.00
07/01/18	RJS	Review email from Committee member regarding draft letter to potential unsecured creditors (.1); review and revise draft letter (.5); draft email to C. Rubio regarding same (.1).	0.70	325.00	227.50
07/02/18	CMR	Prepare comments to letter to creditors and prepare cover letter to Committee members for same (.8); respond to committee member questions in connection with same (.4).	1.20	475.00	570.00
07/04/18	CMR	Prepare detailed comments to letter to creditors.	1.00	475.00	475.00
07/05/18	CMR	Address correspondence from G. Ingram and S. Schmidt regarding the letter to creditors.	1.10	475.00	522.50
07/09/18	CMR	Review social media posts and prepare comments to proposed responses (.5).	0.50	475.00	237.50
07/10/18	CMR	Prepare for and attend Civic Club meeting to hear Debtor's position in bankruptcy case and answer member's questions regarding the committee (no travel time charged, no follow up communications with creditors charged).	1.00	475.00	475.00
07/15/18	CMR	Review and provide comments to press release statement.	0.30	475.00	142.50
08/21/18	CMR	Call with J. Rovira, creditor representative, regarding potential creditor claims and status of case (.6).	0.60	475.00	285.00
08/24/18	CMR	Prepare response to email from Matt Gannon (.2).	0.20	475.00	95.00
08/27/18	CMR	Follow up with M. Houston regarding survey (.2); follow up with Committee regarding survey and proposed order (.2).	0.40	475.00	190.00
09/12/18	CMR	Multiple correspondence with M. Gannon regarding meetings with GOMO (.5).	0.50	475.00	237.50
09/18/18	CMR	Call with M. Gannon (.5).	0.50	475.00	237.50
09/22/18	CMR	Attend town hall and follow up meeting between the Committee and GOMO Board; follow up conversations with Committee members (3.8); address follow up correspondence from Committee members (.4).	4.20	475.00	1,995.00
Total Fees			14.80		6,925.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
I.D. 2490-00015 - CMR
Re: Meetings/Communications with Creditors

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Invoice 31582
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Total Fees and Disbursements	6,925.00
Total Current Charges	6,925.00


DIAMOND McCARTHY_{LLP}

**Two Houston Center
909 Fannin St., 37th Floor
Houston, TX 77010**

Fed. Tax I.D. #76-0631446

Official Committee of Unsecured Creditors, GOMO as Debto
Gary Ingram, Co-Chair
ingram.gary@gmail.com

Invoice 33449
October 21, 2019

ID: 2490-00015 - CMR

Re: Meetings/Communications with Creditors

For Services Rendered Through 9/30/2019

Balance Forward		6,925.00
Current Fees	4,062.50	
Total Current Charges		4,062.50
Total Due		10,987.50

Open Invoices				
Invoice Date	Invoice Number	Original Amount	Payments and Credits	Balance
10/16/18	31582	6,925.00	0.00	6,925.00
Totals		6,925.00	0.00	6,925.00

Invoice Date	Invoice Number	Original Amount	Payments and Credits	Balance
10/16/18	31582	6,925.00	0.00	6,925.00
Totals		6,925.00	0.00	6,925.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto
 I.D. 2490-00015 - CMR
 Re: Meetings/Communications with Creditors

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 Invoice 33449
 Page 2

Fee Recap

		Hours	Rate/Hour	Amount
Charles M. Rubio	Partner	4.50	525.00	2,362.50
Michael D. Fritz	Associate	5.00	340.00	1,700.00
Totals		9.50		4,062.50

Fees

Date	Atty	Description	Hours	Rate	Amount
10/16/18	MDF	Meeting with Creditors' Committee regarding case status and proposals for plan of reorganization.	2.80	340.00	952.00
10/25/18	MDF	Review Debtor's monthly operating reports and summarize same for members of Committee.	0.40	340.00	136.00
11/27/18	MDF	Discussion of status of case with C. Rubio before meeting (.2); participate in meeting of creditors' committee (1.5).	1.70	340.00	578.00
12/03/18	MDF	Review correspondence with Committee members and C. Rubio.	0.10	340.00	34.00
02/07/19	CMR	Work on addressing creditor questions received in connection with the Debtor's and Committee's plans and disclosure statement and multiple correspondence with the Committee members regarding same.	0.90	525.00	472.50
02/08/19	CMR	Correspondence with Committee Members regarding bankruptcy pleadings and disclosure (.2), pull and review notice procedures order in connection with same (.2) prepare email to J. Patterson regarding pleadings that are not on GOMO website in violation of the notice procedures order (.3); follow up with Committee members with Johnie's response (.1); call with Lance Fee and prepare summary of call to members of the Committee and Nina Tran (.8).	1.60	525.00	840.00
05/22/19	CMR	Prepare revisions to letter to creditors with update on status of case and circulate to Committee members for further comments.	1.30	525.00	682.50
05/23/19	CMR	Provide comments to update letter to the creditors and send to G. Ingram.	0.70	525.00	367.50
Total Fees			9.50		4,062.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto
I.D. 2490-00015 - CMR
Re: Meetings/Communications with Creditors

October 21, 2019
Invoice 33449
Page 3

Total Fees and Disbursements	4,062.50
Total Current Charges	4,062.50
Balance Forward	6,925.00
Total Amount Due	10,987.50

The above amount may not include third party expenses for which we have not yet been billed.

REMITTANCE WITHIN 20 DAYS IS APPRECIATED



**Two Houston Center
909 Fannin St., 37th Floor
Houston, TX 77010**

Fed. Tax I.D. #76-0631446

Official Committee of Unsecured Creditors, GOMO as Debto
Susanna Schmidt, Co-Chair
733 W. 38th Street
Houston, TX 77018

Invoice 31583
October 16, 2018

ID: 2490-00016 - CMR

Re: Plan and Disclosure Statement

For Services Rendered Through 9/30/2018

Current Fees	9,292.00	
Total Current Charges		9,292.00
Total Due		9,292.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00016 - CMR
 Re: Plan and Disclosure Statement

October 16, 2018
 Invoice 31583
 Page 2

Fee Recap

		Hours	Rate/Hour	Amount
Charles M. Rubio	Partner	18.30	475.00	8,692.50
Robert J. Shannon	Associate	1.10	325.00	357.50
Catherine A. Burrow	Paralegal	1.10	220.00	242.00
Totals		20.50		9,292.00

Fees

Date	Atty	Description	Hours	Rate	Amount
06/13/18	CMR	Prepare correspondence to Committee members addressing setting out proposed outline and addressing issues in connection with a possible chapter 11 plan.	0.90	475.00	427.50
06/20/18	RJS	Draft summary of Committee restructuring term sheet (.8); draft comments to same (.3).	1.10	325.00	357.50
06/29/18	CMR	Work on term sheet for the proposed plan (1.3); prepare responses to G. Ingram's email (.8).	2.10	475.00	997.50
07/17/18	CMR	Prepare for and attend committee meeting to discuss plan term sheet and discovery.	2.80	475.00	1,330.00
07/18/18	CMR	Follow up with C. Lambright regarding plan term sheet.	0.20	475.00	95.00
07/23/18	CMR	Work on plan term sheet (1.0); call with C. Lambright regarding POA formation process to address in plan term sheet (.6).	1.60	475.00	760.00
07/24/18	CMR	Follow up with C. Lambright regarding terms of the plan (.3). revise plan term sheet and circulate to committee (.8).	1.10	475.00	522.50
07/27/18	CMR	Further revise and circulate plan term sheet (.7); address committee comments to the plan term sheet (.5).	1.20	475.00	570.00
08/02/18	CMR	Multiple correspondence to J. Patterson regarding hearing preparation and plan term sheet (.3).	0.30	475.00	142.50
08/07/18	CMR	Call with J. Patterson to discuss motion to extend exclusivity (.2).	0.20	475.00	95.00
08/08/18	CAB	Prepare initial draft objection to Debtor's emergency motion to extend exclusivity and forward to C. Rubio (.6); revise draft objection to include comments received from C. Rubio (.5).	1.10	220.00	242.00
08/08/18	CMR	Research and prepare response to motion to extend exclusivity (2.8).	2.80	475.00	1,330.00
08/13/18	CMR	Follow up with committee and bankruptcy court on order in connection with motion for preliminary injunction.	0.20	475.00	95.00
09/19/18	CMR	Research Texas Property Code in connection with GOMO meeting (1.4); prepare correspondence to J. Patterson (.5). prepare for and attend meeting with GOMO Board (2.2).	4.10	475.00	1,947.50
09/20/18	CMR	Prepare correspondence to Committee members outlining proposal for plan structure.	0.80	475.00	380.00
Total Fees			20.50		9,292.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto	October 16, 2018
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Re: Plan and Disclosure Statement	Page 3

Total Fees and Disbursements	9,292.00
Total Current Charges	9,292.00

The above amount may not include third party expenses for which we have not yet been billed.
REMITTANCE WITHIN 20 DAYS IS APPRECIATED


DIAMOND McCARTHY_{LLP}

**Two Houston Center
909 Fannin St., 37th Floor
Houston, TX 77010**

Fed. Tax I.D. #76-0631446

Official Committee of Unsecured Creditors, GOMO as Debtor
Gary Ingram, Co-Chair
ingram.gary@gmail.com

Invoice 33450
October 21, 2019

ID: 2490-00016 - CMR

Re: Plan and Disclosure Statement

For Services Rendered Through 9/30/2019

Balance Forward		9,292.00
Current Fees	89,249.00	
Total Current Charges		89,249.00
Total Due		98,541.00

Open Invoices				
Invoice Date	Invoice Number	Original Amount	Payments and Credits	Balance
10/16/18	31583	9,292.00	0.00	9,292.00
Totals		9,292.00	0.00	9,292.00

Invoice Date	Invoice Number	Original Amount	Payments and Credits	Balance
10/16/18	31583	9,292.00	0.00	9,292.00
Totals		9,292.00	0.00	9,292.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00016 - CMR
 Re: Plan and Disclosure Statement

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Fee Recap

		Hours	Rate/Hour	Amount
Charles M. Rubio	Partner	56.00	475.00	26,600.00
Charles M. Rubio	Partner	85.00	525.00	44,625.00
Michael D. Fritz	Associate	29.70	340.00	10,098.00
Michael D. Fritz	Associate	17.80	360.00	6,408.00
Catherine A. Burrow	Paralegal	6.90	220.00	1,518.00
Totals		195.40		89,249.00

Fees

Date	Atty	Description	Hours	Rate	Amount
10/30/18	CMR	Prepare proposed order regarding extension of exclusivity and circulate to Committee members and Patterson for comment.	0.80	475.00	380.00
10/31/18	CMR	Prepare detailed email to Committee members regarding the process for soliciting acceptances to plan in response to questions on same.	0.70	475.00	332.50
11/01/18	CMR	Work on finalizing proposed orders extending exclusivity (.5); correspondence with J. Patterson regarding same (.1).	0.60	475.00	285.00
12/03/18	CMR	Call with J. Patterson to discuss GOMO Plan (.8); follow up correspondence with Committee regarding same (.5); prepare for town hall with Committee meeting (.5); attend town hall (2.0); follow up meeting with Committee regarding same (.5).	4.30	475.00	2,042.50
12/04/18	CMR	Prepare correspondence to S. Boyd and J. Patterson regarding recommendation for setting up approval process for amended and restated deed restrictions.	0.50	475.00	237.50
12/09/18	CMR	Multiple correspondence between Committee members to address proposal sent by Vic Seagers (1.1); call with Committee members to address items with proposal and develop a response (2.0); prepare draft response and circulate it to the Committee (.5).	3.60	475.00	1,710.00
12/09/18	MDF	Telephonic meeting with Committee to discuss case status and disclosure statement.	2.30	340.00	782.00
12/10/18	CMR	Review and analyze comments from Committee members and further revise proposed response to Seagers and circulate to Committee for comments (.8); conversation with Adam Zuvanch from the Leader (.5).	1.30	475.00	617.50
12/10/18	MDF	Review Committee correspondence regarding potential plan.	0.20	340.00	68.00
12/12/18	CMR	Prepare for meeting with Committee to review response to Vic Seagers (.5); meeting with Committee to review draft bylaws (2.0); meeting with P. Chang and G. Ingram to finalize response to Vic Seagers (1.3).	3.80	475.00	1,805.00
01/03/19	MDF	Review current draft of Debtor's disclosure statement to identify issues.	0.30	340.00	102.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debto
 I.D. 2490-00016 - CMR
 Re: Plan and Disclosure Statement

October 21, 2019
 Invoice 33450
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Date	Atty	Description	Hours	Rate	Amount
01/03/19	CMR	Prepare for and attend call with Committee members to discuss drafts of Debtor plan documents.	1.10	475.00	522.50
01/03/19	CMR	Review draft of debtor's disclosure statement (1.5); correspondence with committee members regarding same (.2).	1.70	475.00	807.50
01/05/19	MDF	Research two questions arising from structure of Debtor's proposed plan of reorganization.	1.60	340.00	544.00
01/06/19	MDF	Meet with GOMO Creditors' Committee to discuss components of committee's plan.	2.00	340.00	680.00
01/07/19	CMR	Prepare email memo to respond to Committee member's questions regarding GOMO Plan (.7); prepare email to J. Patterson outlining seven problems with the Debtor's plan and disclosure statement (.5).	1.20	475.00	570.00
01/07/19	CMR	Prepare for hearing on conditional approval of the Debtor's disclosure statement including preparing hearing script.	1.80	475.00	855.00
01/07/19	MDF	Strategic discussion regarding upcoming hearing on approval of Debtor's disclosure statement.	0.60	340.00	204.00
01/08/19	CMR	Prepare for hearing on conditional approval of disclosure statement including preparing Power point (3.2); attend hearing (1.2); follow up meeting with Committee regarding same (1.0).	5.40	475.00	2,565.00
01/09/19	CMR	Coordinate with M. Fritz on preparation of Committee plan documents.	0.30	475.00	142.50
01/11/19	CMR	Correspondence with G. Ingram regarding preparation of the Committee plan documents (.1); work on revised bylaws in connection with same (1.6); prepare list of 10 objections to the disclosure statement for S. Schmidt (.3); work on bylaw amendments (.8).	2.80	475.00	1,330.00
01/11/19	MDF	Begin drafting disclosure statement for Committee plan.	5.00	340.00	1,700.00
01/12/19	CMR	Review draft disclosure statement and prepare comments and send to M. Fritz to incorporate into the next version of the draft.	2.10	475.00	997.50
01/12/19	MDF	Continue drafting disclosure statement for Committee plan.	1.50	340.00	510.00
01/16/19	MDF	Call with C. Rubio regarding Committee's plan and associated consent form (.3); review of drafts of same (.3); prepare draft order approving disclosure statement and plan (1.5).	2.10	340.00	714.00
01/16/19	CMR	Call with M. Fritz regarding Committee plan and consent form.	0.30	475.00	142.50
01/17/19	MDF	Draft order approving disclosure statement (1.5); call regarding status of plan and disclosure statement drafts and need for research regarding amendments to bylaws (.5).	2.00	340.00	680.00
01/18/19	CMR	Prepare for and attend call with Committee members regarding plan process and status of drafting plan documents.	1.40	475.00	665.00
01/18/19	MDF	Participate in call with Committee to strategize regarding preparation of disclosure statement and plan.	2.00	340.00	680.00
01/19/19	CMR	Work on plan, disclosure statement and consent form.	0.80	475.00	380.00
01/20/19	MDF	Continue work on Committee's disclosure statement, plan, and associated documents.	2.50	340.00	850.00

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00016 - CMR
 Re: Plan and Disclosure Statement

October 21, 2019
 Invoice 33450
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Date	Atty	Description	Hours	Rate	Amount
01/20/19	CMR	Address comments from G. Ingram to disclosure statement, plan and consent documents.	1.70	475.00	807.50
01/21/19	CMR	Finalize and file the Committee's plan document and motion to approve the disclosure statement.	1.90	475.00	902.50
01/22/19	MDF	Review e-mails from Committee members and draft response thereto (.2); continue drafting Committee's plan (3.5); participate in call with Committee regarding same (1.0); create restructured amendments to deed restrictions (1.3).	6.00	340.00	2,040.00
01/22/19	CMR	Call with members of the Committee and M. Fritz to discuss current draft of the plan documents and strategy for the next hearing (1.0); call with M. Fritz to discuss plan drafting and issues related to the Texas Property Code (.5); prepare and send email to S. Boyd regarding Texas Property Code and exception to use of amendment provision (.2); call with Stephen Cooney, prospective HOA attorney for Committee (.6).	2.30	475.00	1,092.50
01/24/19	CMR	Work on revising plan, disclosure statement, motion and proposed order including conforming changes throughout the documents, revising and supplementing sections on new board member elections.	4.30	475.00	2,042.50
01/25/19	CMR	Review the Debtor's supplemental plan documents including motion to approve solicitation materials, proposed order approving solicitation materials, order setting deadlines and the ballot, follow up with Committee members regarding same (.7); call with G. Ingram to discuss comments to proposed amendment to bylaws (.5); work on revising plan documents to conform with changes to the disclosure statement and revise numerous concepts including election of new directors in connection with the plan (3.3).	4.50	475.00	2,137.50
01/25/19	MDF	Review Debtor's proposed solicitation materials.	0.30	340.00	102.00
01/27/19	MDF	Participate in call with Committee and review edits to disclosure statement.	0.50	340.00	170.00
01/27/19	CMR	Work on finalizing Committee plan documents, circulate proposed final version to M. Fritz to prepare related hearing notice.	1.70	475.00	807.50
01/28/19	MDF	Draft confirmation hearing notice (.3); listen in to hearing regarding Debtor's solicitation materials (.5).	0.80	340.00	272.00
01/28/19	CAB	Review notice procedures established by the court together with all filings to determine all parties required to receive notice of motion to approve Committee's disclosure statement (.4); update service list to include additional parties to receive notice (.3); serve Committee's motion to approve disclosure statement to all required parties (.4); prepare and file certificate of service evidencing same (.4).	1.50	220.00	330.00
01/28/19	CMR	Continue to address Committee comments with respect to the plan documents and revise same (1.1); prepare for continued hearing on Debtor's disclosure statement (1.1); attend continued hearing on Debtor's disclosure statement and follow up meeting with	4.90	475.00	2,327.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00016 - CMR
 Re: Plan and Disclosure Statement

October 21, 2019
 Invoice 33450
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Date	Atty	Description	Hours	Rate	Amount
		Committee members (2.7).			
01/31/19	CAB	Finalize and file notice of revised committee letter to be included in plan solicitation packets.	0.30	220.00	66.00
01/31/19	CMR	Coordinate filing of revised committee letter for solicitation package and prepare PDF and send to J. Patterson.	0.20	475.00	95.00
02/06/19	MDF	Review Committee's letter responding to solicitation of plan.	0.10	360.00	36.00
02/08/19	CMR	Prepare for and participate on call with Committee members to map out timelines for the plan processes (.9).	0.90	525.00	472.50
02/14/19	CMR	Prepare for and attend call with the Committee to discuss amendment to Committee plan documents.	1.50	525.00	787.50
02/20/19	CMR	Correspondence to set up call with Committee members to discuss Hover Slovacek's research.	0.20	525.00	105.00
02/20/19	CMR	Review certificate of service for Debtor's plan and follow up with Johnie Patterson on questions to same (.3); prepare email to Committee members to explain certificate of service and questions to Patterson (.2).	0.50	525.00	262.50
02/21/19	CMR	Call with Nina Tran and Committee members to discuss approach for amending documents (1.2); follow up with Nina Tran and Committee members with a proposed timetable and relevant documents for Hoover Slovacek to review (.5).	1.70	525.00	892.50
02/26/19	CMR	Prepare email to Committee members addressing issues and questions raised in connection with Debtor's town hall.	0.90	525.00	472.50
03/05/19	CMR	Review comments from Hoover Slovacek to the Restrictions Amendment, the Bylaw Amendment and the Consent Form and follow up email to Hoover Slovacek requesting review and comments of specified plan and disclosure statement order provisions (.9); attend call with Committee to review Restrictions, Bylaws Consent Form and strategy for amending the plan documents. (2.9).	3.80	525.00	1,995.00
03/08/19	CMR	Call with Committee members to discuss changes to plan and disclosure statement.	1.00	525.00	525.00
03/09/19	CMR	Work on reviewing and revising plan and disclosure statement to incorporate comments from Hoover Slovacek (2.2).	2.20	525.00	1,155.00
03/10/19	CMR	Work on liquidation analysis and budget for exhibits to the amended disclosure statement (2.1); work on revisions to amended disclosure statement, amended plan and proposed disclosure statement order (2.6); call with G. Ingram to discuss changes (.4); prepare transmittal email to Committee members identifying major changes in the documents and directions for providing feedback prior to filing (.6).	5.70	525.00	2,992.50
03/11/19	CAB	Prepare draft notice of redline versions of Committee's proposed plan, disclosure statement, and order approving disclosure statement and forward to C. Rubio for review and comment.	0.80	220.00	176.00
03/11/19	CMR	Work on finalizing amended plan, amended disclosure statement and revised proposed disclosure statement order and calls and	0.50	525.00	262.50

Diamond McCarthy LLP

Official Committee of Unsecured Creditors, GOMO as Debtor
 I.D. 2490-00016 - CMR
 Re: Plan and Disclosure Statement

October 21, 2019
 Invoice 33450
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Date	Atty	Description	Hours	Rate	Amount
		correspondence with G. Ingram regarding same (1.5); prepare final versions, redline versions and file them (.5).			
03/12/19	CMR	Prepare email to Committee with file stamped copies of the amended chapter 11 plan documents (.2); review changes to the deed restriction amendments and the consent form circulated by M. Knop and address same (.3).	0.50	525.00	262.50
03/19/19	CMR	Meeting with Committee members to discuss next steps with the plan process.	0.80	525.00	420.00
03/20/19	CMR	Prepare for Debtor's confirmation including outlining topics for Rule 30(b)(6) deposition (.5); circulate and respond to comments from Committee members on proposed topics (.4); send list to J. Patterson and follow up correspondence regarding scheduling date and time for deposition (.3).	1.20	525.00	630.00
03/20/19	CMR	Confer with Committee members regarding deposition of GOMO rep for confirmation hearing (.2); prepare and send email to J. Patterson with deposition topics (.3).	0.50	525.00	262.50
03/22/19	CMR	Meeting with P. Chang and G. Ingram regarding next steps in plan negotiations and strategy for same including meeting with V. Seagers and A. Thomas.	1.80	525.00	945.00
03/22/19	MDF	Call with C. Rubio regarding strategy for resolution of plan and disclosure statement issues (.2).	0.20	360.00	72.00
03/23/19	MDF	Research case law on two points relevant to preparation of plan and disclosure-statement objection.	1.80	360.00	648.00
03/25/19	CMR	Organize M. Fritz and C. Burrow to prepare response in connection with Debtor's plan (.4); prepare comprehensive report to Committee summarizing reports on weekend meetings, my communications with J. Patterson and outlining proposed next steps (.8).	1.20	525.00	630.00
03/26/19	CAB	Prepare draft objection to debtor's plan and disclosure statement and forward to C. Rubio.	1.80	220.00	396.00
03/26/19	CMR	Review Debtor's objection to Committee's Plan and Disclosure Statement and follow up with the Committee members regarding same.	0.40	525.00	210.00
03/27/19	MDF	Conduct research on classification and related questions in support of Committee's objection to Debtor's plan and disclosure statement (1.8).	1.80	360.00	648.00
03/30/19	CMR	Work on Committee's Objection to Debtor's Plan and Disclosure Statement, continue to research law in connection with same and circulate to M. Fritz for comments (2.3); work on Committee' Reply to Debtor's Objection to Committee's Plan and Disclosure Statement (.5); work on 2004 Exam Notice related to pre-confirmation deposition (.5).	3.30	525.00	1,732.50
03/30/19	MDF	Review draft of objection to Debtor's disclosure statement and notice of deposition.	1.70	360.00	612.00
04/01/19	CAB	File Committee's objection to plan and disclosure statement.	0.10	220.00	22.00

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Date	Atty	Description	Hours	Rate	Amount
04/01/19	CMR	Incorporate Committee's comments into the draft objection to the Debtor's Plan and Disclosure Statement (.9); prepare and circulate revised clean and redline to the Committee members (.3); continue to revise filings and coordinate with C. Burrow on filing (.5); coordinate with Committee members on hearing preparation (.3).	2.00	525.00	1,050.00
04/04/19	MDF	Review and edit outline for deposition (.5); attend deposition of GOMO representative (1.1); discussion regarding upcoming hearing with G. Ingram and C. Rubio (1.0).	2.60	360.00	936.00
04/04/19	CMR	Prepare for and attend deposition of GOMO corporate representative and follow up meeting with J. Patterson, G. Ingram regarding plan settlement discussions.	2.20	525.00	1,155.00
04/05/19	CAB	Assemble and prepare documents to be used as exhibits at 4/9/19 hearing on Debtor's plan and disclosure statement (.8); prepare, finalize and file witness and exhibit list (.5).	1.30	220.00	286.00
04/05/19	CMR	Prepare for and attend hearing with the Committee to prepare for April 9 hearing.	2.20	525.00	1,155.00
04/05/19	MDF	Meeting with GOMO committee members regarding next steps in plan and disclosure statement process.	1.50	360.00	540.00
04/06/19	CMR	Meeting with the creditor's committee to revise terms of chapter 11 plan.	2.80	525.00	1,470.00
04/07/19	CMR	Work on preparing revised plan and disclosure statement (2.8); circulate to Committee and N. Tran (.1); address Committee member comments in connection with same (.3).	3.20	525.00	1,680.00
04/08/19	MDF	Strategic discussion regarding GOMO joint-plan with C. Rubio.	0.50	360.00	180.00
04/08/19	CMR	Continue to incorporate Committee members comments into revised Plan and Disclosure Statement and meeting with M. Fritz in connection with same (1.2); prepare notes for hearing on Debtor's confirmation and Committee's disclosure statement (.8); prepare redline of plan and disclosure statement and notice of redline (.6); file plan, disclosure statement and notice (.2).	2.80	525.00	1,470.00
04/09/19	CMR	Prepare for and attend hearing on Debtor's Plan and Committee's Disclosure Statement.	2.50	525.00	1,312.50
04/16/19	CMR	Review information on Debtor's website regarding Debtor's revised plan and respond to Committee member questions in connection with same.	0.40	525.00	210.00
04/17/19	CMR	Multiple correspondence with Committee members and correspondence with J. Patterson to advance the plan and disclosure statement process; review terms of revised plan on GOMO website regarding the same.	0.50	525.00	262.50
04/24/19	CMR	Call with J. Patterson on plan revisions.	0.20	525.00	105.00
04/25/19	CMR	Follow up with Committee regarding call with J. Patterson on status of plan revisions and address follow up correspondence in connection with same.	0.40	525.00	210.00
05/01/19	CMR	Follow up with J. Patterson regarding status of mark ups to plan and disclosure statement.	0.10	525.00	52.50

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Date	Atty	Description	Hours	Rate	Amount
05/03/19	CMR	Review proposed draft Second Amended Plan from Debtors and confer with Committee regarding same.	0.70	525.00	367.50
05/05/19	CMR	Calls with G. Ingram, P. Chang, and C. Luck regarding the joint plan (1.0) prepare draft of joint chapter 11 plan and send to J. Patterson for comments (3.8).	4.80	525.00	2,520.00
05/06/19	CMR	Prepare transmittal email to J. Patterson with proposed joint chapter 11 plan (.3); prepare redlines for same to compare against Debtor's last and Committee's last plan (.3); call with J. Patterson to discuss same (.1); correspondence with Committee members regarding same (.2); coordinate with C. Burrow to prepare witness and exhibit list (.1); call with Committee members to discuss plan (.5).	1.50	525.00	787.50
05/07/19	CMR	Work on prepare witness and exhibit list for disclosure statement hearing (.4). correspondence with Committee members regarding Debtor's indication of no objection to disclosure statement and address follow up questions regarding same (.3); review redline of plan from J. Patterson and distribute to committee members with comments (.7).	1.40	525.00	735.00
05/08/19	CMR	Prepare revised disclosure statement order and circulate to committee members for comments (1.2); work on script for disclosure statement hearing (.6).	1.80	525.00	945.00
05/08/19	MDF	Call with Creditors' committee re upcoming hearing on disclosure statement.	0.60	360.00	216.00
05/09/19	CAB	Prepare notice of redlined proposed order approving Committee's disclosure statement and forward to C. Rubio for review and comment (.4); revise, finalize, and file same with court (.2); assist with final preparations for hearing (.2).	0.80	220.00	176.00
05/09/19	MDF	Prepare for and attend hearing on Committee's disclosure statement.	4.90	360.00	1,764.00
05/09/19	CMR	Meeting with the Committee to prepare for the continued hearing on disclosure statement and plan (2.0); attend hearing (3.0); follow up conversation with Committee members regarding same (.3).	5.30	525.00	2,782.50
05/09/19	MDF	Debrief with members of creditors' committee regarding next steps in plan process.	0.20	360.00	72.00
05/13/19	CMR	Multiple correspondence with J. Patterson, Committee members and N. Tran to discuss next steps for joint plan and resolving issue regarding amendments to deed restrictions (1.2).	1.20	525.00	630.00
05/14/19	CMR	Prepare recommendation to J. Patterson to have S. Boyd and N. Tran meet and confer to resolve issue regarding process for amending deed restrictions.	0.30	525.00	157.50
05/15/19	CMR	Prepare recommendation to J. Patterson to have S. Boyd and N. Tran meet and confer to resolve issue regarding process for amending deed restrictions (.2); review response from J. Patterson and prepare recommendation to committee members regarding same (.4).	0.60	525.00	315.00

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Date	Atty	Description	Hours	Rate	Amount
05/16/19	CMR	Prepare for and attend meeting with Committee members to discuss disclosure statement hearing, negotiations with the Debtor and joint summary disclosure statement.	2.40	525.00	1,260.00
05/25/19	CMR	Substantially revise proposed email to V. Seaghers outlining remaining issues to work through for a joint plan and circulate to committee members.	0.80	525.00	420.00
05/28/19	CMR	Review and revise draft response to the GOMO Board regarding the approval process for the amendments to the deed restrictions.	1.70	525.00	892.50
05/29/19	CMR	Prepare draft summary disclosure statement and combined ballot and circulate to committee members (1.3); call with committee members to discuss disclosure statement hearing (1.3).	2.60	525.00	1,365.00
05/29/19	CMR	Prepare for and attend call with committee members to discuss disclosure statement hearing.	1.50	525.00	787.50
05/29/19	MDF	Participate in call with creditors' committee re strategy for moving forward with plan and disclosure statement.	1.30	360.00	468.00
05/30/19	CMR	Review transcript from last hearing and prepare email to committee members explaining the Court's request to prepare a combined summary disclosure statement in the event there are two plans (.5).	0.50	525.00	262.50
05/31/19	CMR	Call with G. Ingram to discuss disclosure statement hearing, plan and professional expenses.	0.50	525.00	262.50
06/03/19	CMR	Call with J. Patterson to discuss plan and disclosure statement hearing.	0.30	525.00	157.50
06/04/19	CAB	Finalize and file witness and exhibit list for 6/6/19 hearing.	0.30	220.00	66.00
06/04/19	CMR	Prepare draft of supplement to disclosure statement motion and circulate to Committee members for comments (1.5); meeting with G. Ingram to prepare for disclosure statement hearing (.8); prepare draft of witness and exhibit list for the disclosure statement hearing and coordinate with C. Burrow for filing (.3).	2.30	525.00	1,207.50
06/05/19	MDF	Strategize with C. Rubio re upcoming hearing on disclosure statement.	0.60	360.00	216.00
06/05/19	CMR	Review Debtor's second amended plan and begin working on summary disclosure statement to compare differences with Debtor's plan.	2.60	525.00	1,365.00
06/06/19	CMR	Continue to work on summary disclosure statement comparing Debtor's new plan with Committee's second amended plan (1.9); work on hearing outline (.9); prepare materials to take to Court (.3); pre-meeting with the Committee and attend hearing to approve Committee's second amended disclosure statement (1.2).	4.30	525.00	2,257.50
Total Fees			195.40		89,249.00

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Total Fees and Disbursements	89,249.00
Total Current Charges	89,249.00
Balance Forward	9,292.00
Total Amount Due	98,541.00

The above amount may not include third party expenses for which we have not yet been billed.

REMITTANCE WITHIN 20 DAYS IS APPRECIATED