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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

Jagged Peak, Inc., a Nevada corporation,

☒ Affects this Debtor.

Case No.: BK-S-19-15959-MKN

Chapter 11

LEAD CASE

Jointly Administered with:

In re

TradeGlobal, LLC, a Delaware limited liability company,

☒ Affects this Debtor.

Case No.: BK-S-19-15960-MKN
 Chapter 11

Case No.: BK-S-19-15961-MKN
 Chapter 11

In re

TradeGlobal North America Holding, Inc., a Delaware corporation,

☒ Affects this Debtor.

DECLARATION OF KATHRYN A. COLEMAN IN SUPPORT OF FIRST INTERIM FEE APPLICATION OF HUGHES HUBBARD & REED LLP, FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD SEPTEMBER 16, 2019 THROUGH AND INCLUDING DECEMBER 31, 2019

1 I, Kathryn A. Coleman, hereby declare as follows:

2 1. I am over the age of 18 and am mentally competent. I make this declaration in
3 support of the *First Interim Fee Application of Hughes Hubbard & Reed LLP, for Allowance and*
4 *Payment of Compensation and Reimbursement of Expenses for the Period September 16, 2019*
5 *Through and Including December 31, 2019* (the “**Application**”).¹

6 2. I am an attorney licensed to practice law in the State of New York, Bar No. 442905,
7 and am a partner with the law firm of Hughes Hubbard & Reed (“**HHR**”).

8 3. This is the first interim application for allowance of compensation and reimbursement
9 of expenses filed by HHR in the Chapter 11 Cases. The Application covers the period of September
10 16 through December 31, 2019.

11 4. Pursuant to the Application, HHR requests allowance of compensation of
12 \$1,100,271.00 and reimbursement of expenses of \$23,176.42, for a total of \$1,123,447.42, in
13 connection with services provided during the Compensation Period. During the Compensation
14 Period, HHR’s professionals expended a total of 1,145.60 hours for which compensation is sought.
15 HHR’s billing entries are attached as Exhibit C to the Application.

16 5. Exhibit C to the Application identifies and provides chronologically throughout the
17 Compensation Period: (a) the dates on which HHR performed professional services for the Special
18 Committees; (b) each person performing such services; (c) the amount of time spent by each person
19 on each day that the person performs such services (charged in units of one-tenth [0.1] of an hour);
20 and (d) specific daily descriptions of the services performed by each person. These time entries are
21 grouped by task category.

22 6. Exhibit D to the Application contains a detailed statement of actual and necessary
23 out-of-pocket expenses incurred and paid by HHR during the Compensation Period in its
24 representation of the Special Committees.

25 7. HHR’s fees are reasonable based on the customary compensation charged by
26 comparably skilled practitioners in a competitive legal market. The hourly rates charged for services
27

28 ¹. All capitalized, undefined terms shall have the meanings ascribed to them in the Application.

1 rendered in connection with the Chapter 11 Cases are enumerated in summary charts to the
2 Application.

3 8. There is no agreement or understanding between HHR and any other person, other
4 than members of the firm, for the sharing of compensation to be received for services rendered in the
5 Chapter 11 Cases.

6 9. During the Compensation Period, HHR performed a wide range of actual and
7 necessary services, which are summarized by task category and itemized in detail in the Application.
8 HHR respectfully submits that the services for which it seeks compensation and the expenditures for
9 which it seeks reimbursement in this Application were necessary for and beneficial to assist the
10 Special Committees in their oversight of the Chapter 11 Cases.

11 10. HHR has incurred and paid out-of-pocket expenses totaling \$23,176.42 during the
12 Compensation Period. The items for which expense reimbursement are being sought are not
13 included in HHR's overhead, and are not, therefore, a part of the hourly rates charged by HHR.
14 Included in HHR's general overhead, and thus not charged as an expense to the client, are long-
15 distance calls and conference calls using HHR's internal conference network. HHR submits that the
16 expenses that it has incurred and paid in rendering legal services to the Special Committees during
17 the Compensation Period are reasonable and necessary under the circumstances of these Chapter 11
18 Cases, and that the reimbursement to HHR for such expenses is appropriate and should be allowed.

19 I declare under penalty of perjury that the foregoing is true and correct to the best of my
20 knowledge and belief.

21 Executed this 17th day of January 2020.

22 Kathryn A. Coleman
23 KATHRYN A. COLEMAN
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