

9. HFB has performed legal services for various other Potential Parties in Interest from time to time in matters wholly unrelated to the subject matter of the GDS Litigation and these chapter 11 cases, to wit: DFW International Airport, American Eagle, a Ken Wimberly, who may or may not be a Potential Party in Interest, Staubach Retail and Elk River Investments, entities owned or controlled by or affiliated with Roger Staubach, Regions Bank, Bank of America, Bank of Texas (related to Bank of Oklahoma), Capital One Bank, JP Morgan Chase Bank, Wells Fargo, U.S. Bancorp Equipment Finance, Inc., City of Fort Worth, University of Illinois, and Kelly Hart & Hallman Law Firm.

10. Bank of America, Bank of Texas, Capital One Bank, JP Morgan Chase Bank, and Wells Fargo are current clients of HFB, as HFB either currently represents, or may in the future represent, such banks on matters unrelated to the matters on which HFB is to be employed.

11. To the extent that any work was done by HFB for any of the parties listed in paragraph 9, above, in 2011, the services accounted for less than 1% of HFB's revenues for the year 2011, with the exception of services for Bank of Texas which accounted for approximately 2.2% of such revenues.

12. HFB has previously, may currently, and may in the future work with certain of the Debtors' creditors, equity security holders or other Potential Parties In Interest, in connection with matters that are unrelated to the GDS Litigation. In addition, HFB did not hold a retainer as of the Commencement Date. On November 29, 2011, HFB received a payment from American Airlines in the amount of \$150,987.17, which was in excess of the amount then owed for pre-petition services by \$74,542.15. That excess amount was immediately deposited

into HFB's trust account for safekeeping and refunded to American Airlines on December 12, 2011.

13. HFB has one shareholder and one employee, each of whom is married to an American Airlines employee who is not an insider of the Debtors, as such term is defined in section 101(31) of the Bankruptcy Code. The shareholder and employee have not, and shall not, work on the GDS Litigation. Also, Dee S. Finley, one of HFB's shareholders, is on the Board of Trustees of Baylor All Saints Medical Center at Fort Worth and until Aug. 1, 2011 was on the Board of Trustees of Baylor Health Care System. HFB believes that such work and such relationships do not create an interest adverse to the Debtors with respect to the matters on which HFB is to be employed.

14. Accordingly, pursuant to section 327(e) of the Bankruptcy Code, HFB respectfully submits that none of the connections disclosed herein render HFB adverse to the Debtors or their estates with respect to the matters on which HFB is to be employed.

Professional Compensation

15. Subject to the Court's approval, HFB will charge for its services on an hourly basis in one-tenth hour (.1) increments, in accordance with its standard hourly rates in effect on the date services are rendered. HFB's current customary hourly rates, subject to change from time to time, are \$265 to \$400 for shareholders ("partners"), \$225 to \$265 for associates, and \$120 to \$125 for paraprofessionals. HFB also intends to seek reimbursement for reasonable expenses incurred in connection with its representation of the Debtors.

16. HFB intends to seek compensation in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, any applicable orders of the Court, the Second Amended Order Pursuant to 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (ECF No. 1656), the Amended