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Proposed Attorneys for VidAngel, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:

VIDANGEL, INC.,

Debtor.

Case No. 17-29073

Chapter 11

Judge Kevin R. Anderson

**DECLARATION OF NEAL HARMON IN SUPPORT OF
DEBTOR'S APPLICATION FOR INTERIM AND FINAL
ORDERS AUTHORIZING THE EMPLOYMENT AND
RETENTION OF PARSONS BEHLE & LATIMER AS
ATTORNEYS FOR THE DEBTOR**

I, Neal Harmon, declare as follows:

1. I am the CEO of VidAngel, Inc., the debtor and debtor-in-possession ("VidAngel" or the "Debtor") in the above-captioned Chapter 11 case.

2. I am over the age of 18 and competent to testify as to the matters set forth herein.

The facts set forth herein are based upon my personal knowledge.

3. I submit this Declaration in support of the Application of Debtor VidAngel, Inc. (the "Debtor" or "VidAngel") for an Order Authorizing the Employment and Retention of Parsons Behle & Latimer as Attorneys for the Debtor (the "Application"), filed concurrently

herewith, and to make certain disclosures as required under Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “**Rules**”).

4. The Debtor seeks to retain Parsons Behle & Latimer (“**Parsons Behle**”) or the “**Firm**”) as counsel in this case. The Debtor considered retaining other counsel with similar capabilities to represent it in the Chapter 11 case. But the Debtor chose Parsons Behle for its sophisticated Chapter 11 bankruptcy practice and considerable experience before the Bankruptcy Court for the District of Utah where the Chapter 11 case is pending. After careful consideration, the Debtor selected Parsons Behle as an appropriate professional to employ in this situation.

5. Prior to filing its retention application and this declaration, Parsons Behle provided me with drafts of the application, the supporting Declaration of J. Thomas Beckett (the “**Beckett Declaration**”), and the Engagement Agreement attached as Exhibit C to the Application (the “**Engagement Agreement**”). I have reviewed the terms of the Engagement Agreement and understand the procedures by which Parsons will apply for and be paid compensation and reimbursement in the Chapter 11 case in accordance with the Guidelines promulgated by the U.S. Trustee.

6. Parsons and the Debtor anticipate that most, if not all, of the time in this bankruptcy case will be billed primarily by four lawyers: J. Thomas Beckett, Bruce H. White, Brian M. Rothschild, and Grace S. Pusavat, whose billing rates and practice areas are as follows:


- a. J. Thomas Beckett (bankruptcy): \$500.00 per hour;
- b. Bruce H. White (bankruptcy): \$450.00 per hour;
- c. Brian M. Rothschild (bankruptcy); \$280.00 per hour;
- d. Grace S. Pusavat (litigation/bankruptcy): \$225.00 per hour

7. The Debtor will review and approve the bills submitted by Parsons Behle, including time entries and requests for reimbursement of expenses to ensure that the rates

charged and time submitted are reasonable considering the work performed. In addition, Parsons Behle will file applications for compensation in accordance with the guidelines promulgated by the U.S. Trustee, the Bankruptcy Code, and any compensation procedures approved by the Court, which will enable the Court, the U.S. Trustee, and other interested parties to review and object to the fees.

I, Neal Harmon, hereby declare, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

DATED this 19 day of October, 2017.



Neal Harmon
Chief Executive Officer
VidAngel, Inc.