### IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA NEWNAN DIVISION

	Related to Docket No. 59	
Debtors.	(Jointly Administered)	
AFH AIR PROS, LLC, et al., 1	Case No. 25-10356 (PMB)	
In re:	Chapter 11	

NOTICE OF FILING OF MODIFIED PROPOSED ORDER
AUTHORIZING (I) THE RETENTION OF ACCORDION PARTNERS, LLC TO
PROVIDE THE DEBTORS A CHIEF RESTRUCTURING OFFICER AND
CERTAIN ADDITIONAL PERSONNEL AND (II) DESIGNATION OF ANDREW D.J.
HEDE AS CHIEF RESTRUCTURING OFFICER FOR THE DEBTORS AND DEBTORS
IN POSSESSION, EFFECTIVE AS OF THE PETITION DATE

PLEASE TAKE NOTICE that, on March 21, 2025, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the Application for an Order Authorizing (I) the Retention of Accordion Partners, LLC to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel and (II) Designation of Andrew D.J. Hede as Chief Restructuring Officer for the Debtors and Debtors In Possession, Effective as of the Petition Date [Docket No. 59] (the "Application"). A proposed form of order was attached to the Application as Exhibit A (the "Initial Proposed Order").

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Notice of Hearing [Docket No. 72] (the "Notice"), objections to approval of the Application were due by April 14, 2025, at 4:00 p.m. (prevailing Eastern Time). The Debtors received informal comments from the Official Committee of Unsecured Creditors (the "Committee"). No other responses or objections were filed on the docket or received by the Debtors.

PLEASE TAKE FURTHER NOTICE that attached hereto as <u>Exhibit A</u> is a revised proposed order granting the Application (the "<u>Modified Proposed Order</u>"), which includes certain clarifying edits and modifications consistent with the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023, as well as informal comments received from the Committee.

<sup>&</sup>lt;sup>1</sup> The last four digits of AFH Air Pros, LLC's tax identification number are 1228. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at https://www.veritaglobal.net/AirPros. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 150 S. Pine Island Road, Suite 200, Plantation, Florida 33324.

**PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit B** is a blackline reflecting the modifications between the Initial Proposed Order and the Modified Proposed Order.

**PLEASE TAKE FURTHER NOTICE** that, because the Committee's informal comments are resolved by the Modified Proposed Order and no other responses or objections to the Application were received by the deadline set forth in the Notice, the Debtors respectfully request that the Court enter the Revised Proposed Order at its earliest convenience. Counsel is available at the request of the Court.

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in the above captioned chapter 11 cases are available free of charge by visiting the case website maintained by the Debtors' notice and claims agent, Kurtzman Carson Consultants, LLC dba Verita Global, at <a href="https://www.veritaglobal.net/AirPros">https://www.veritaglobal.net/AirPros</a> or by calling (866) 927-7076. You may also obtain copies of any pleadings by visiting the Office of the Clerk, U.S. Bankruptcy Court for the Northern District of Georgia (Newnan Division) between 8:00 a.m. and 4:00 p.m. or online by visiting the Court's website at <a href="http://ecf.ganb.uscourts.gov">http://ecf.ganb.uscourts.gov</a> (registered users) or at <a href="http://pacer.psc.uscourts.gov">http://pacer.psc.uscourts.gov</a> (unregistered users). Further information may be obtained by using the "Submit an Inquiry" function at <a href="https://www.veritaglobal.net/AirPros/inquiry">https://www.veritaglobal.net/AirPros/inquiry</a>.

Dated: April 16, 2025 Respectfully submitted,

#### GREENBERG TRAURIG, LLP

/s/ David B. Kurzweil

David B. Kurzweil (Ga. Bar No. 430492) Matthew A. Petrie (Ga. Bar No. 227556) Terminus 200 3333 Piedmont Road, NE, Suite 2500 Atlanta, Georgia 30305 Telephone: (678) 553-2100 Email: kurzweild@gtlaw.com

petriem@gtlaw.com

Proposed Counsel for the Debtors and Debtors in Possession

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2025, all ECF participants registered in these Chapter 11 Cases were served electronically with the foregoing notice through the Court's ECF system at their respective email addresses registered with this Court.

By: <u>/s/ David B. Kurzweil</u> David B. Kurzweil

# Exhibit A

(Modified Proposed Order)

## IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA NEWNAN DIVISION

	Re: Docket No. 59
Debtors.	(Jointly Administered)
AFH AIR PROS, LLC, et al., 1	Case No. 25-10356 (PMB)
In re:	Chapter 11

ORDER AUTHORIZING (I) THE RETENTION OF ACCORDION PARTNERS, LLC TO PROVIDE THE DEBTORS A CHIEF RESTRUCTURING OFFICER AND CERTAIN ADDITIONAL PERSONNEL AND (II) DESIGNATION OF ANDREW D.J. HEDE AS CHIEF RESTRUCTURING OFFICER FOR THE DEBTORS AND DEBTORS IN POSSESSION, EFFECTIVE AS OF THE PETITION DATE

Upon the application [Docket No. 59] (the "<u>Application</u>")<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>"), for entry of an order (this "<u>Order</u>") authorizing the Debtors to retain Andrew D.J. Hede as Chief Restructuring Officer ("<u>CRO</u>") and

<sup>&</sup>lt;sup>1</sup> The last four digits of AFH Air Pros, LLC's tax identification number are 1228. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at https://www.veritaglobal.net/AirPros. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 150 S. Pine Island Road, Suite 200, Plantation, Florida 33324.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

Accordion Partners, LLC ("Accordion") and provide certain additional personnel, effective as of the Petition Date, pursuant to sections 105(a) and 363(b) of title 11 of the United States Code (the "Bankruptcy Code"); rules 6003 and 6004(h) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and the Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases, dated February 6, 2023; and the Court having reviewed the Application, the Declaration of Andrew D.J. Hede in Support of the Debtors' Application for an Order Authorizing (I) the Retention of Accordion Partners, LLC to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel and (II) Designation of Andrew D.J. Hede as Chief Restructuring Officer for the Debtors and Debtors In Possession, Effective as of the Petition Date (the "Hede Declaration"); and this Court having found that the Court has jurisdiction over the matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that the Court has jurisdiction over the matter pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that in accordance with the Engagement Letter, all as more fully set forth in the Application; and the Court being satisfied, based on the representations made in the Application and the Declaration, that (a) Accordion does not hold or represent an interest adverse to the Debtors' estates and (b) Accordion is a "disinterested person" as defined in section 101(14) of the Bankruptcy Code; and due and sufficient notice of the Application and (i) the opportunity to object to relief requested in the Application by April 14, 2025 at 4:00 p.m. (prevailing Eastern Time) and (ii) the hearing on the Application scheduled for April 23, 2025 at 1:00 p.m. (prevailing Eastern Time) having been given under the particular circumstances pursuant to the Third Amended and Restated General Order No. 24-2018; and no hearing is necessary on the Application absent the filing of an objection with respect to the same; and the Court having considered the Application and all other matters of record, including the lack of objection thereto; and based on the foregoing, no further notice or hearing is required; and this Court having found that the relief requested in the Application is in the best interests of the Debtors' estates, their creditors, and other parties-in-interest; and this Court having found that the Debtors' notice and opportunity for a hearing on the Application were appropriate and no other notice need be provided; and this Court having reviewed the Application and having heard the statements in support of the relief requested therein at a hearing before this Court, if any; and this Court having determined that the legal and factual bases set forth in support of the Application establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and any objection to the relief requested herein having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

- 1. The Application is granted, as set forth herein.
- 2. The terms of the Engagement Letter, including without limitation, the compensation provisions and the indemnification provisions, as modified by the Application and this Order, are reasonable terms and conditions of employment and are hereby approved.
- 3. In accordance with section 363 of the Bankruptcy Code, the Debtors are authorized to (i) retain Accordion to provide the Debtors with a CRO and certain Additional Personnel and (ii) designate Andrew D.J. Hede as the Debtors' CRO, effective as of the Petition Date, in accordance with the terms and conditions of the Engagement Letter.
- 4. Upon employment and retention by the Debtors, the Engagement Personnel shall be empowered and authorized to carry out all duties and responsibilities set forth in the Engagement Letter.

Case 25-10356-pmb Doc 205-1 Filed 04/16/25 Entered 04/16/25 16:13:58 Desc Exhibit A - Modified Proposed Order Page 5 of 9

- 5. Accordion and its affiliates shall not act in any other capacity (for example, and without limitation, as a financial advisor, claims agent/administrator, or investor/acquirer) in connection with these Chapter 11 Cases.
- 6. In the event the Debtors seek to have Additional Personnel assume executive officer positions that are different from the positions disclosed in the Motion, or to materially change the terms of the engagement by either adding new executive officers or altering or expanding the scope of the engagement, a motion to modify Accordion's retention shall be filed.
- 7. Accordion shall file with the Court and provide the U.S. Trustee and any official committees, including the Official Committee of Unsecured Creditors (the "Committee", and together, the "Notice Parties") a report of staffing (the "Staffing Report") on the engagement for the previous month by the twentieth (20th) of each month for the previous month. The Staffing Report shall include the names, hours worked, and requested compensation by the Additional Personnel in these Chapter 11 Cases for the month and an itemized list of the reimbursable expenses incurred for the relevant period. The time records shall (i) be appended to such reports, (ii) be organized by project category (but may be redacted to protect any attorney-client privilege or other applicable privilege), and (iii) include time spent on each category by each timekeeper in tenths of an hour. Where personnel are providing services at an hourly rate, the time entries shall identify the time spent completing each task in half-hour increments and corresponding charge for each task. The Notice Parties shall have ten (10) days after the date of each Staffing Report is served on the Notice Parties to object to such Staffing Report. In the event an objection is raised and not consensually resolved between the Debtors and any objecting party, the objected to portion of the Staffing Report (and Accordion's staffing for this matter) will be subject to review by the

Court. No payments shall be made to Accordion on account of the objected to portion of such Staffing Report until such objection is resolved.

- 8. Accordion shall also file reports of compensation earned, and expenses incurred on a quarterly basis. Such reports shall contain summary charts which describe the services provided, identify the compensation earned by each executive officer and staff employee provided, and itemize the expenses incurred. Such compensation and expenses shall be subject to Court review solely in the event that an objection is filed as set forth in paragraph 7 above.
- 9. Accordion shall abide by the provisions set forth in Section J of the Court's General Order No. 26-2019 (the "Complex Case Procedures") and shall receive monthly payments from the Debtors consistent with Section J; provided, however, Accordion shall not be required to submit fee applications pursuant to Sections 330 and 331 of the Bankruptcy Code. Instead, Accordion's fees shall be reviewed at the conclusion of the case on a reasonableness standard.
- 10. Accordion is entitled to seek reimbursement of actual and necessary expenses, including legal fees related to its retention, staffing, or compensation reports.
- 11. The Debtors are permitted to indemnify those persons serving as executive officers on the same terms as provided to the Debtors' other officers and directors under the corporate bylaws and applicable state law, along with insurance coverage under the Debtors' Directors & Officers insurance policies and all other relevant active insurance policies carried by the Debtors.
- Debtors shall have no obligation to indemnify Accordion or to provide contribution or reimbursement to Accordion for any claim or expense that is either (a) judicially determined to have resulted primarily from the willful misconduct, gross negligence, bad faith, or self-dealing of Accordion; or (b) settled prior to a judicial determination as to Accordion's willful misconduct,

gross negligence, bad faith, or self-dealing but determined by the Court, after notice and a hearing, to be a claim or expense for which Accordion should not receive indemnity, contribution, or reimbursement under the terms of the Engagement Letter.

- 13. Accordion shall provide ten (10) business days' notice to the Debtors and the U.S. Trustee in connection with any increase in the hourly rates listed in the Application.
- 14. The Engagement Personnel shall use reasonable efforts to avoid any duplication of services provided by any of the Debtors' other retained professionals.
- 15. To the extent that there is any inconsistency between the terms of the Application, the Engagement Letter, the Hede Declaration, or this Order, this Order shall govern.
- 16. For a period of three (3) years after the conclusion of Accordion's engagement, neither Accordion nor any of its affiliates shall make any investments in the Debtors or reorganized Debtors, as applicable.
- 17. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.
- 18. Notice of the Application as provided therein is deemed to be good and sufficient notice of such Application, and the requirements of the Bankruptcy Local Rules are satisfied by the contents of the Application.
- 19. Notwithstanding any stay that might be imposed by Bankruptcy Rule 6004 or otherwise, this Order shall be immediately effective and enforceable upon its entry.
- 20. This Court shall retain jurisdiction with respect to all matters arising or related to the implementation of this Order.
- 21. Proposed counsel for the Debtors, through Kurtzman Carson Consultants, LLC, dba Verita Global, as the Debtors' claims and noticing agent (the "Claims and Noticing Agent"), shall,

within three days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first class mail, as applicable, on all parties served with the Application, and the Claims and Noticing Agent shall file promptly thereafter a certificate of service confirming such service.

END OF DOCUMENT

Prepared and presented by:

## **GREENBERG TRAURIG, LLP**

/s/ David B. Kurzweil

David B. Kurzweil (Ga. Bar No. 430492)
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Proposed Counsel for the Debtors and Debtors in Possession

# Exhibit B

(Blackline)

### IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA NEWNAN DIVISION

In re:	Chapter 11
AFH AIR PROS, LLC, et al.,1	Case No. 25-10356 (PMB)
Debtors.	(Jointly Administered)
	Re: Docket No. 59

ORDER AUTHORIZING (I) THE RETENTION OF ACCORDION PARTNERS, LLC TO PROVIDE THE DEBTORS A CHIEF RESTRUCTURING OFFICER AND CERTAIN ADDITIONAL PERSONNEL AND (II) DESIGNATION OF ANDREW D.J. HEDE AS CHIEF RESTRUCTURING OFFICER FOR THE DEBTORS AND DEBTORS IN POSSESSION, EFFECTIVE AS OF THE PETITION DATE

Upon the application [Docket No. 59] (the "Application")<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the "Debtors"), for entry of an order

The last four digits of AFH Air Pros, LLC's tax identification number are 1228. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at <a href="https://www.veritaglobal.net/AirPros">https://www.veritaglobal.net/AirPros</a>. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 150 S. Pine Island Road, Suite 200, Plantation, Florida 33324.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

(this "Order") authorizing the Debtors to retain Andrew D.J. Hede as Chief Restructuring Officer ("CRO") and Accordion Partners, LLC ("Accordion") and provide certain additional personnel, effective as of the Petition Date, pursuant to sections 105(a) and 363(b) of title 11 of the United States Code (the "Bankruptcy Code"); rules 6003 and 6004(h) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and the Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases, dated February 6, 2023; and the Court having reviewed the Application, the Declaration of Andrew D.J. Hede in Support of the Debtors' Application for an Order Authorizing (I) the Retention of Accordion Partners, LLC to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel and (II) Designation of Andrew D.J. Hede as Chief Restructuring Officer for the Debtors and Debtors In Possession, Effective as of the Petition Date (the "Hede Declaration"); and this Court having found that the Court has jurisdiction over the matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that the Court has jurisdiction over the matter pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that in accordance with the Engagement Letter, all as more fully set forth in the Application; and the Court being satisfied, based on the representations made in the Application and the Declaration, that (a) Accordion does not hold or represent an interest adverse to the Debtors' estates and (b) Accordion is a "disinterested person" as defined in section 101(14) of the Bankruptcy Code; and due and sufficient notice of the Application and (i) the opportunity to object to relief requested in the Application by April 14, 2025 at 4:00 p.m. (prevailing Eastern Time) and (ii) the hearing on the Application scheduled for April 23, 2025 at 1:00 p.m. (prevailing Eastern Time) having been given under the particular circumstances pursuant to the Third Amended and Restated General

- 1. The Application is granted, as set forth herein.
- 2. The terms of the Engagement Letter, including without limitation, the compensation provisions and the indemnification provisions, as modified by the Application and this Order, are reasonable terms and conditions of employment and are hereby approved.
- 3. In accordance with section 363 of the Bankruptcy Code, the Debtors are authorized to (i) retain Accordion to provide the Debtors with a CRO and certain Additional Personnel and (ii) designate Andrew D.J. Hede as the Debtors' CRO, effective as of the Petition Date, in accordance with the terms and conditions of the Engagement Letter.
- 4. Upon employment and retention by the Debtors, the Engagement Personnel shall be empowered and authorized to carry out all duties and responsibilities set forth in the

Engagement Letter.

- 5. Accordion and its affiliates willshall not act in any other capacity (for example, and without limitation, as a financial advisor, claims agent/administrator, or investor/acquirer) in connection with these Chapter 11 Cases.
- 6. In the event the Debtors seek to have Additional Personnel assume executive officer positions that are different from the positions disclosed in the Motion, or to materially change the terms of the engagement by either adding new executive officers or altering or expanding the scope of the engagement, a motion to modify Accordion's retention shall be filed.
- 7. 6. On a monthly basis, Accordion shall file with the Court and provide the U.S. Trustee and any official committees—(, including the Official Committee of Unsecured Creditors (the "Committee", and together, the "Notice Parties") a report of staffing (the "Staffing Report") on the engagement for the previous month by the twentieth (20th) of each month for the previous month, (the "Staffing Report"). The Staffing Report will shall include the names—and tasks filled by all Engagement Personnel involved in this matter. The Staffing, hours worked, and requested compensation by the Additional Personnel in these Chapter 11 Cases for the month and an itemized list of the reimbursable expenses incurred for the relevant period. The time records shall (i) be appended to such reports, (ii) be organized by project category (but may be redacted to protect any attorney-client privilege or other applicable privilege), and (iii) include time spent on each category by each timekeeper in tenths of an hour. Where personnel are providing services at an hourly rate, the time entries shall identify the time spent completing each task in half-hour increments and corresponding charge for each task. The Notice Parties shall have ten (10) days after

- 8. 7. Accordion shall also file reports of compensation earned, and expenses incurred on a quarterly basis. Such reports shall contain summary charts which describe the services provided, identify the compensation earned by each executive officer and staff employee provided, and itemize the expenses incurred. Such compensation and expenses shall be subject to Court review solely in the event that an objection is filed as set forth in paragraph 7 above.
- **9. 8.** Accordion shall abide by the provisions set forth in Section J of the Court's General Order No. 26-2019 (the "Complex Case Procedures") and shall receive monthly payments from the Debtors consistent with Section J; provided, however, Accordion shall not be required to submit fee applications pursuant to Sections 330 and 331 of the Bankruptcy Code. Instead, Accordion's fees shall be reviewed at the conclusion of the case on a reasonableness standard.
- **10. 9.** Accordion is entitled to seek reimbursement of actual and necessary expenses, including legal fees related to its retention, staffing, or compensation reports.
- 11. 10. The Debtors are permitted to indemnify those persons serving as executive officers on the same terms as provided to the Debtors' other officers and directors under the corporate bylaws and applicable state law, along with insurance coverage under the Debtors' Directors & Officers insurance policies and all other relevant active insurance policies

#### carried by the Debtors.

- <u>Accordion</u>, the Debtors shall have no obligation to indemnify Accordion or to provide contribution or reimbursement to Accordion for any claim or expense that is either (a) judicially determined to have resulted primarily from the willful misconduct, gross negligence, bad faith, or self-dealing of Accordion; or (b) settled prior to a judicial determination as to Accordion's willful misconduct, gross negligence, bad faith, or self-dealing but determined by the Court, after notice and a hearing, to be a claim or expense for which Accordion should not receive indemnity, contribution, or reimbursement under the terms of the Engagement Letter.
- 13. 11. Accordion shall provide ten (10) business days' notice to the Debtors and the U.S. Trustee in connection with any increase in the hourly rates listed in the Application.
- 14. 12. The Engagement Personnel shall use reasonable efforts to avoid any duplication of services provided by any of the Debtors' other retained professionals.
- 15. 13. If To the extent that there is any inconsistency between the terms of the Application, the Engagement Letter, the Hede Declaration, or this Order, this Order shall govern.
- 16. 14. For a period of three (3) years after the conclusion of Accordion's engagement, neither Accordion nor any of its affiliates shall make any investments in the Debtors or reorganized Debtors, as applicable.
- 15. Any party in interest shall have 21 days from the service of this Order to file an objection to the Application and/or the relief provided in this Order.
- 16. If an objection is timely filed, counsel for the Debtors will set the Application and all such objections for hearing pursuant to the Court's Open Calendar Procedures.

- 17. If no objection to this Order is timely filed, this Order shall be a final Order approving the Application.
- 17. 18. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.
- 18. 19. Notice of the Application as provided therein is deemed to be good and sufficient notice of such Application, and the requirements of the Bankruptcy Local Rules are satisfied by the contents of the Application.
- <u>19.</u> <u>20. The terms and conditions of Notwithstanding any stay that might be imposed by Bankruptcy Rule 6004 or otherwise,</u> this Order shall be immediately effective and enforceable upon its entry.
- 21. This Court shall retain jurisdiction with respect to all matters arising or related to the implementation of this Order.
- 21. 22. Proposed counsel for the Debtors, through Kurtzman Carson Consultants, LLC, dba Verita Global, as the Debtors' claims and noticing agent (the "Claims and Noticing Agent"), shall, within three days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first class mail, as applicable, on all parties served with the Application, and the Claims and Noticing Agent shall file promptly thereafter a certificate of service confirming such service.

#### END OF DOCUMENT

Prepared and presented by:

# GREENBERG TRAURIG, LLP

/s/ David B. Kurzweil

Debtors in Possession

David B. Kurzweil (Ga. Bar No. 430492) Matthew A. Petrie (Ga. Bar No. 227556) Terminus 200 3333 Piedmont Road, NE, Suite 2500 Atlanta, Georgia 30305 Telephone: (678) 553-2100 Email: kurzweild@gtlaw.com

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Proposed Counsel for the Debtors and

Summary report:		
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Move To	0	
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Table Delete	0	
Table moves to	0	
Table moves from	0	
Embedded Graphics (Visio, ChemDraw, Images etc.)	0	
Embedded Excel	0	
Format changes	0	
Total Changes:	73	