

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)
_____ /

**SUMMARY OF FIRST AND FINAL FEE APPLICATION FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF LUIS SALAZAR, ESQ.,
CONSUMER PRIVACY OMBUDSMAN FOR THE PERIOD
OF APRIL 22, 2025 THROUGH JULY 16, 2025**

Name of Applicant: Luis Salazar
Role of Applicant: Consumer Privacy Ombudsman
Name of certifying professional: Luis Salazar
Date case filed: March 16, 2025
Date of Appointment as CPO: April 22, 2025
Date of this Application: July 29, 2025
Dates of services covered: April 22, 2025 through July 16, 2025

Fees . . .

Total fees requested for Application Period: \$15,275.00
Balance remaining in fee retainer account, not yet awarded: Not Applicable
Fees paid or advanced for Application Period, by other sources: \$0.00
Net amount of fees requested for Application Period: \$15,275.00

Expenses . . .

Total expense reimbursement requested for Application Period: \$258.60

¹ 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.



Balance remaining in expense retainer account, not yet awarded:	Not Applicable
Expenses paid or advanced for Application Period, by other sources:	\$0.00
Net amount of expense reimbursements requested for Application Period:	\$258.60
GROSS AWARD REQUESTED FOR APPLICATION PERIOD:	\$15,533.60
NET AWARD REQUESTED FOR APPLICATION PERIOD:	\$15,533.60

HISTORY OF FEES AND EXPENSES

1. Dates, sources, and amounts of retainers received: **None.**
2. Dates, sources, and amounts of third party payments received: **Not applicable**
3. Prior fee and expense awards: **Not applicable**

UNITED STATES BANKRUPTCY COURT
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AFH AIR PROS, LLC, *et al.*², Case No. 25-10356 (PMB)
Debtors. (Jointly Administered)
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**FIRST AND FINAL FEE APPLICATION FOR COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF LUIS SALAZAR, ESQ.,
CONSUMER PRIVACY OMBUDSMAN FOR THE PERIOD
OF APRIL 22, 2025 THROUGH JULY 16, 2025**

LUIS SALAZAR, CONSUMER PRIVACY OMBUDSMAN (the “**Consumer Privacy Ombudsman**”), hereby submits this first and final fee application (the “**Application**”), pursuant to sections 328(a), 330 and 331 of title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the Northern District of Georgia, for Compensation and Reimbursement of Expenses incurred for the period from **April 22, 2025 through and including July 16, 2025** (the “**Fee Period**”), and respectfully states:

BACKGROUND

1. On March 16, 2025 (the “**Petition Date**”), , each of the Debtors filed a voluntary petition [ECF No. 1] for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) (the “**Chapter 11 Cases**”).

² 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.

2. The Debtors operate their business and manage their properties as debtors and debtors-in-possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these cases.

3. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1344, Bankruptcy Rule 5005, and Local Rule 1070-1. This is a core proceeding.

4. On March 16, 2025, (i) Debtor Air Pros One Source LLC, as seller, its affiliate Air Pros Solutions, LLC and Any Hour, LLC, as buyer (the “**One Source Purchaser**”) entered into that certain Asset Purchase Agreement (the “**One Source APA**”) and (ii) Debtor East Coast Mechanical, LLC, as seller, Air Pros Solutions, LLC, and East Coast Mechanical Home Services LLC (the “**ECM Purchaser**”) entered into that certain Asset Purchase Agreement (the “**ECM APA**”). As used herein, “Purchaser” shall mean collectively, the One Source Purchaser and the ECM Purchaser, and “**APA**” means, collectively, the One Source APA and the ECM APA.³ The APA contemplates that the Purchaser will purchase certain assets of the Debtors (as further defined in the respective APA, the “**Acquired Assets**”) and may assume certain contracts and leases. The principal terms of the APA are summarized in the Debtors’ Sale Motion (as defined below), but the Acquired Assets include, among other things customer lists.⁴

1. On March 18, 2025, Debtors filed their *Motion of the Debtors for Entry of Orders (I)(A) Establishing Bidding Procedures Relating to the Sale of the Debtors’ Assets, (B) Approving the Debtors’ Entry into the Stalking Horse Purchase Agreements and Related Bid Protections, (C) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Approving Form and Manner of Notices Relating Thereto, (E) Scheduling a Hearing to Consider the Proposed Sale, and (F) Granting Related Relief; and (II)(A) Approving the Sale of the Debtors’ Assets Free and*

³ Capitalized terms used herein but not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors’ Sale Motion.

⁴ See One Source APA at Ex. A, sub-paragraph (g) (“all customer or potential customer lists and files, vendor lists and files, mailing lists, email lists, advertiser lists, databases (including archived databases) and similar material, whether in print or electronic form, including any lists relating to past, present or prospective customers”); ECM APA § 2.1(g) (providing for the sale of “**Intellectual Property**”, which is defined to include “**customer lists**”).

Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [ECF No. 34, as amended by ECF No. 55] (the “**Sale Motion**”).

5. On March 31, 2025, the United States Trustee for the Northern District of Georgia appointed an official Committee of Creditors Holding Unsecured Claims (the “**Committee**”) pursuant to section 1102(a)(1) of the Bankruptcy Code [ECF No. 111].

6. General background information regarding the Debtors and these Chapter 11 Cases is set forth in the *Declaration of Andrew D. J. Hede in Support of Chapter 11 Petitions and First Day Pleadings* [ECF No. 8].

CERTIFICATION OF CONSUMER PRIVACY OMBUDSMAN

7. A Certification in support of this Application is attached hereto as **Exhibit A** and made a part of this Application.

BASIS FOR FEE APPLICATION OF CONSUMER PRIVACY OMBUDSMAN

8. On April 22, 2025, the United States Trustee filed its *Notice of Appointment of Consumer Privacy Ombudsman* [ECF No. 243], appointing Luis Salazar as the Ombudsman, pursuant to 11 U. S. C. § 332.

9. The Consumer Privacy Ombudsman was appointed to assist the court in its consideration of the facts, circumstances, and conditions of the proposed sale or lease of personally identifiable information under Section 363(b)(1)(B).

10. By this Application, the Consumer Privacy Ombudsman seeks (i) allowance and award, on a *final basis*, of professional fees in the amount of **\$15,275.00** for the period of **April 22, 2025 through and including July 16, 2025** and **\$258.60** for reimbursement of expenses, for a total amount of **\$15,333.60**; and (ii) authorization for payment of fees and reimbursement of expenses in the amount of **\$15,333.60** for the period of **April 22, 2025 through and including July 16, 2025**, representing the total amount of fees and expenses incurred by the Consumer Privacy Ombudsman that remains unpaid.

11. A description of (i) the professionals performing the services; (ii) the date the services were performed; and (iii) a detailed description of the nature of the services and the time expended; are set forth in **Exhibit B**.

COMPENSATION PAID AND ITS SOURCE

12. All services for which the Consumer Privacy Ombudsman seeks compensation were performed within the scope of his appointment in connection with these Chapter 11 Cases.

13. The Consumer Privacy Ombudsman has received no payment and no promises for payment from any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between the Consumer Privacy Ombudsman and any nonaffiliated person for the sharing of compensation to be received for services rendered in these cases. The Consumer Privacy Ombudsman has received no retainer for the services rendered in these cases.

SUMMARY OF SERVICES RENDERED BY CONSUMER PRIVACY OMBUDSMAN

14. The Consumer Privacy Ombudsman has provided services relating to the sale of the Debtors' assets including, among other things, the following:

- a. review and analysis of Debtor Air Pros One Source LLC's general privacy policies associated with related Acquired Assets that were in effect on the Petition Date;
- b. review and analysis of Debtor East Coast Mechanical, LLC's general privacy policies associated with related Acquired Assets that were in effect on the Petition Date;
- c. review and analysis of Debtor Air Pros One Source LLC's privacy policies, terms and conditions, and web-site pages in effect during the year prior to the petition date, as available on Archive.org;
- d. review and analysis of Debtor East Coast Mechanical, LLC's privacy policies, terms and conditions, and web-site pages in effect during the year prior to the petition date, as available on Archive.org;

- a. review and analysis of the Purchaser's Asset Purchase Agreement (attached to the Bidding Procedures Order as Exhibit 2-B (ECM APA) and Exhibit 2-E (One Source APA));
- b. review and analysis of the general privacy policy used by the One Source Purchaser and the ECM Purchaser and their related companies, as may be appropriate;
- c. review and analysis of relevant pleadings, including the *Declaration of Andrew D. J. Hede in Support of Chapter 11 Petitions and First Day Pleadings* [ECF No. 8] (the "**Declaration**") and the Sale Motion;
- d. review and analysis of Personally Identifiable Information collection procedures;
- e. research applicable Federal, State, and local laws and regulations regarding the privacy of consumer information, as necessary, and review the outcome in comparable situations; and
- f. communications with counsel regarding the proposed sale contemplated under the Sale Motion.

15. The Consumer Privacy Ombudsman believes that the invoice attached hereto as Exhibit B is in substantial compliance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules of this Court, and the Compensation Order.

16. The Consumer Privacy Ombudsman believes that the services rendered during the pendency of these cases were necessary and provided a direct and substantial benefit to the estate and creditors, and that the fees and expenses sought in this Application are reasonable and should be allowed on a final basis and approved for payment in full, subject to any applicable Orders of this Court.

PRIOR REQUESTS BY THE CONSUMER PRIVACY OMBUDSMAN

17. No prior application, or fee statements have been submitted by the Consumer Privacy Ombudsman.

NOTICE OF CONSUMER PRIVACY OMBUDSMAN'S FIRST AND FINAL FEE APPLICATION

18. Bankruptcy Rule 2002(a)(6) requires notice of a hearing on a request for compensation or for reimbursement of expenses, among other filings, to be served on the "debtor, the trustee, all creditors, and all indenture trustees at least 21 days' notice by mail." Pursuant to paragraph 8 of the Court's *Order Authorizing the Debtors (A) to Prepare and*

Maintain a Consolidated Master List of Creditors in Lieu of Submitting a Formatted Mailing Matrix for Each Debtor, (B) to Redact Personally Identifiable Information for Individual Creditors and Parties in Interest, and (C) to Provide Electronic Notice to Individual Customers and Maintain a Confidential Customer Service List [ECF No. 41], this Application has been served on the Limited Service List, including (a) the Office of the United States Trustee, (b) the committee of unsecured creditors, (c) the Debtors and their counsel, and (d) any other party that filed a request for notice in this bankruptcy case. The Ombudsman requests that no other or further notice be provided.

REVIEW OF APPLICABLE LOCAL RULES

19. The Consumer Privacy Ombudsman has reviewed the requirements of Local Rules for the Northern District of Georgia and certifies to the best of his information, knowledge, and belief that this Application substantially complies with the applicable Local Rules and Procedures of this Court.

WHEREFORE, the Consumer Privacy Ombudsman respectfully requests that this Court issue an Order (i) granting this Application; (ii) allowing, and awarding, on a *final basis*, fees in the amount of **\$15,275.00** for the period of **April 22, 2025 through and including July 16, 2025** and **\$258.60** for reimbursement of expenses, for a total amount of **\$15,333.60**; (iii) authorizing direct and immediate payment of **\$15,333.60** for the period of **April 22, 2025 through and including July 16, 2025**, representing the total amount of fees and expenses incurred by the Consumer Privacy Ombudsman that remains unpaid; and (iv) affording such other and further relief as may be fair and reasonable under the circumstances.

Dated: July 29, 2025

Respectfully submitted,

By: /s/ Luis Salazar

Luis Salazar
Florida Bar No. 147788
Consumer Privacy Ombudsman
2121 SW 3rd Avenue, Suite 200
Miami, Florida 33129
Phone: (305) 374-4848
Email: Luis@Salazar.Law

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that the foregoing document is being served this day on all counsel of record and interested parties authorized to receive Notices of Electronic Filing generated by CM/ECF.

/s/ Luis Salazar

Luis Salazar

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

In re: Chapter 11
AFH AIR PROS, LLC, *et al.*⁵, Case No. 25-10356 (PMB)
Debtors. (Jointly Administered)
_____ /

CERTIFICATION

LUIS SALAZAR, CONSUMER PRIVACY OMBUDSMAN hereby certifies pursuant to 28 U.S.C. § 1746, as follows:

1. I am founder and managing partner with the law firm of Salazar Law and the Court-appointed Consumer Privacy Ombudsman in this case.

2. I hereby submit this Certification in connection with and in support of the Application requesting (i) allowance, award, and payment, on a *final basis*, of professional fees in the amount of \$15,275.00 for the period of April 22, 2025 through and including July 16, 2025 and \$258.60 for reimbursement of expenses, for a total amount of \$15,333.60; and (ii) authorization for payment of fees and reimbursement of expenses in the amount of \$15,333.60 for the period of April 22, 2025 through and including July 16, 2025, representing the total amount of fees and expenses incurred, but that remains unpaid, pursuant to §§ 330 and 331 of title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure.

3. I hereby certify that:

- a. I have read the Application;
- b. The fees and disbursements sought are billed at rates and in accordance with practices customarily employed by me and

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generally accepted by clients;

- c. To the best of my knowledge, information, and belief, in providing a reimbursable service, I do not make a profit on that service, whether the service is performed in-house or by a third party; and
- d. To the best Application substantially complies with the local rules of this Court.

4. In accordance with § 504 of the Bankruptcy Code and 18 U. S. C. § 155, there is no prohibited agreement or understanding between me and any other person for the sharing of compensation to be received for services rendered in this case.

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

Executed on July 29, 2025



Luis Salazar

EXHIBIT B

**SUMMARY OF TIME BY TIME KEEPER
FIRST AND FINAL FEE APPLICATION
Luis Salazar, as Consumer Privacy Ombudsman**

Professional	Role/Position	Amount of Hours	Hourly Billing Rate	Amount of Fees
Luis Salazar	Consumer Privacy Ombudsman	12.9	\$750.00	\$ 9,675.00
Ali-Marcelle Lee- Sin	Senior Paralegal	22.4	\$250.00	\$ 5,600.00
Total:		35.30		\$ 15,275.00

**Blended Hourly
Rate: \$432.72**



2121 SW 3rd Ave Ste 200
Miami, FL 33129
(305) 374-4848
Info@Salazar.Law

BILL TO

Luis Salazar, as Consumer
Privacy Ombudsman
In re AFH AIR PROS, LLC, et al.
Case No. 25-10356 (PMB)

6892

DATE 07/16/2025 **TERMS** Due upon receipt

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	Charges			
04/30/2025	PACER Charges for the period of Apr 01, 2025 to April 30, 2025.	1	18.80	18.80
05/31/2025	PACER Charges for the period of May 01, 2025 to May 31, 2025.	1	19.30	19.30
07/16/2025	Outside Copy and Printing Charges	1	123.75	123.75
07/16/2025	Postage Charges	1	69.00	69.00
	In-House Copy and Printing Charges	185	0.15	27.75
	Subtotal: Charges			258.60
	Billable Time			
04/22/2025	Meeting with Trustee's office - Luis Salazar	0:06	750.00	75.00
04/22/2025	Review sale motion and agreement - Luis Salazar	1:30	750.00	1,125.00
04/22/2025	Correspondence to Debtor's counsel re: CPO issues - Luis Salazar	0:12	750.00	150.00
04/22/2025	Prepare for and participate in conference with U.S. Trustee's Office regarding appointment of CPO and related Sale Matters - Ali-Marcelle Lee-Sin	0:48	250.00	200.00
04/23/2025	Meeting with debtors counsel - Luis Salazar	0:30	750.00	375.00
04/23/2025	Review EC and ssorce one privacy policy and related opt out notice from debtor - Luis Salazar	1:12	750.00	900.00
04/28/2025	Review privacy policies; call with debtor's internal data team - Luis Salazar	1:30	750.00	1,125.00
04/29/2025	Draft CPO report - Luis Salazar	2:30	750.00	1,875.00
04/30/2025	Revise draft CPO Report - Ali-Marcelle Lee-Sin	0:48	250.00	200.00

DATE	DESCRIPTION	QTY	RATE	AMOUNT
04/30/2025	Further revise Report of Consumer Privacy Ombudsman - Ali-Marcelle Lee-Sin	3:00	250.00	750.00
05/01/2025	revise CPO Report - Ali-Marcelle Lee-Sin	0:48	250.00	200.00
05/01/2025	Review Court record and analyze recent pleadings and papers regarding potential sale of Consumer IP in connection with preparation and revision of CPO Report - Ali-Marcelle Lee-Sin	0:30	250.00	125.00
05/02/2025	Reviess draft CPO Report [.6], electronic communications with U.S. Trustee's office enclosing draft CPO Report and requesting comments and suggestions to same [.2], electronic communications with Debtors' counsel enclosing draft CPO Report and requesting comments and suggestions to same [.2] - Ali-Marcelle Lee-Sin	1:00	250.00	250.00
05/02/2025	Follow up communications with Debtors' counsel regarding comments to CPO report and to schedule conference for further discussion and review - Ali-Marcelle Lee-Sin	0:12	250.00	50.00
05/05/2025	Review Court record for relevant dates related to Sale Hearing [.2], Review local rules and Judge's Procedures regarding Virtual appearance of Ombudsman at Sale Hearing and other related Court events [.3] - Ali-Marcelle Lee-Sin	0:30	250.00	125.00
05/05/2025	Prepare for and participate in virtual conference with Leo Muchnik regarding draft CPO Report and Debtors' comments thereto [.6], electronic communications with Leo Muchnik enclosing historical form Sale Orders and other reference material in connection with Ombudsman Report and recommendations/findings [.2] - Ali-Marcelle Lee-Sin	0:48	250.00	200.00
05/05/2025	Revise CPO report - Ali-Marcelle Lee-Sin	1:18	250.00	325.00
05/06/2025	Telephonic communications with Courtroom Deputy to clarify Court procedures regarding virtual appearance at Sale Hearing - Ali-Marcelle Lee-Sin	0:12	250.00	50.00
05/08/2025	work on CPO report - Ali-Marcelle Lee-Sin	0:24	250.00	100.00
05/08/2025	Review comments to Report [.5], prepare updated revised draft CPO Report [.6], multiple communications with Debtors' counsel regarding continued revisions and comments to CPO Report [.4], - Ali-Marcelle Lee-Sin	1:30	250.00	375.00
05/08/2025	continued revisions to CPO Report - Ali-Marcelle Lee-Sin	0:36	250.00	150.00
05/09/2025	Prepare for and participate in conference call with Debtors' counsel regarding CPO Report - Ali-Marcelle Lee-Sin	0:24	250.00	100.00
05/09/2025	Revise CPO Report [1.3], electronic communications with U.S. Trustee's Office regarding draft CPO Report [.1] - Ali-Marcelle Lee-Sin	1:24	250.00	350.00
05/12/2025	Conference call with Debtor counsel re: data issues - Luis Salazar	0:18	750.00	225.00
05/12/2025	Revise report to address issues with consumers requiring notice of opt out - Luis Salazar	0:48	750.00	600.00

DATE	DESCRIPTION	QTY	RATE	AMOUNT
05/12/2025	Revise CPO Report pursuant to comments made by counsel for Debtor and discussion regarding facts and circumstances during virtual conference [.6], confer with L. Salazar regarding certain facts and revisions to CPO report [.3] - Ali-Marcelle Lee-Sin	0:54	250.00	225.00
05/12/2025	Electronic communications with Jonathan Adams enclosing revised and updated draft of CPO Report - Ali-Marcelle Lee-Sin	0:12	250.00	50.00
05/12/2025	Further revisions to CPO Report [.5], compile exhibits and related supporting documents in connection with same in anticipation of filing [.4] - Ali-Marcelle Lee-Sin	0:54	250.00	225.00
05/12/2025	prepare exhibits to CPO Report - Ali-Marcelle Lee-Sin	0:24	250.00	100.00
05/12/2025	Electronic communications with Leo Muchnik enclosing revised and updated draft of CPO Report for final comments prior to filing of same - Ali-Marcelle Lee-Sin	0:12	250.00	50.00
05/13/2025	Revise and finalize report - Luis Salazar	1:48	750.00	1,350.00
05/13/2025	Finalize CPO Report and address filing issues - Ali-Marcelle Lee-Sin	0:30	250.00	125.00
05/18/2025	Review sale motion terms re: CPO issues - Luis Salazar	0:30	750.00	375.00
05/19/2025	Prepare for hearing on sale motions - Luis Salazar	1:00	750.00	750.00
05/19/2025	Attend hearing on sale motions, CPO report - Luis Salazar	1:00	750.00	750.00
06/30/2025	Prepare initial draft Final Application for Compensation and Reimbursement of Expenses for CPO - Ali-Marcelle Lee-Sin	1:00	250.00	250.00
07/04/2025	Review local rules, orders and other applicable procedures, regarding requests for compensation and reimbursement of expenses for the Northern District of Georgia - Ali-Marcelle Lee-Sin	0:48	250.00	200.00
07/15/2025	Revise Final Application for Compensation and Reimbursement of Expenses for CPO - Ali-Marcelle Lee-Sin	0:36	250.00	150.00
07/16/2025	Revise Final Application for Compensation and Reimbursement of Expenses for CPO - Ali-Marcelle Lee-Sin	1:30	250.00	375.00
07/16/2025	Revise exhibits to Final Application for Compensation and Reimbursement of Expenses for CPO - Ali-Marcelle Lee-Sin	0:42	250.00	175.00
07/16/2025	Finalize Final Application for Compensation and Reimbursement of Expenses for CPO - Ali-Marcelle Lee-Sin	0:30	250.00	125.00
	Subtotal:			15,275.00

SUBTOTAL	15,533.60
TAX	0.00
TOTAL	15,533.60

TOTAL DUE

\$15,533.60