

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>PLASTIQ, INC, <i>et al.</i>¹</p> <p style="text-align: right;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 23-10671 (BLS)</p> <p>Obj. Deadline: October 9, 2023, at 4:00 p.m. (ET)</p>
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**SUMMARY OF SECOND COMBINED MONTHLY FEE APPLICATION OF
DUNDON ADVISERS LLC, FINANCIAL ADVISOR FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR
THE PERIOD FROM JULY 1, 2023, TO AUGUST 31, 2023**

Name of Applicant:	Dundon Advisers LLC
Authorized to Provide Services to:	Official Committee of Unsecured Creditors
Date of Retention:	July 24, 2023, effective as of June 9, 2023 [D.I. 197]
Period for which Compensation/ Reimbursement is Sought:	July 1, 2023 – August 31, 2023
Total Compensation Sought as Actual, Reasonable and Necessary, of which 80% is Payable upon approval hereof	\$33,803.00
Expense reimbursement sought as Actual Reasonable and Necessary, of which 100% is Payable upon approval hereof	\$0.00

This is an: X monthly ___ interim ___ final application

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PlastiQ Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.



PRIOR MONTHLY FEE APPLICATIONS

Date Filed	Period Covered	Stated Fees	Expenses	Approval Status	Payments Received
8/8/23 [D.I. 248]	6/9/23 - 6/30/23	\$86,060.00	\$0.00	CNO – [D.I. 286] 8/31/23	\$68,848.00

*NO PRIOR INTERIM FEE APPLICATIONS

FEE SUMMARY BY PROFESSIONAL

<i>Name</i>	<i>Rate</i>	<i>Hours</i>	<i>Fees</i>
Eric Reubel	\$790.00	11.0	\$ 8,690.00
Josh Nahas	\$790.00	19.7	\$ 15,563.00
Jillian Lin	\$650.00	2.0	\$ 1,300.00
Greg Hill	\$550.00	15.0	\$ 8,250.00
Chris Podesfinski	\$475.00	-	\$ -
Total		47.7	\$ 33,803.00

FEE SUMMARY BY TASK CODE

<i>Categories</i>	<i>Hours</i>	<i>Fees</i>
Business Analysis	24.0	\$16,152.00
Case Administration	1.0	\$790.00
Claims Analysis	2.0	\$1,300.00
Committee Member/Professional Meetings & Communications	7.1	\$5,153.00
Debtor Professional and Client Meeting	0.0	\$0.00
Debtor/Lender Professional and Staff Meetings	0.0	\$0.00
Exit Planning and Post-Effective Date Planning	2.6	\$2,054.00
Investigations	0.0	\$0.00
Other Professionals' Retention and Fee Applications	0.0	\$0.00
Plan and Disclosure Statement	3.3	\$2,607.00
Retention and Fee Applications	4.5	\$3,555.00
Sales Process	3.2	\$2,192.00
Total	47.7	\$33,803.00

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

PLASTIQ, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10671 (BLS)

Obj. Deadline: October 9, 2023, at 4:00 p.m. (ET)

**SECOND COMBINED MONTHLY FEE APPLICATION OF
DUNDON ADVISERS LLC, FINANCIAL ADVISOR FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR
THE PERIOD FROM JULY 1, 2023, TO AUGUST 31, 2023**

Dundon Advisers, LLC (“Dundon”) files this second combined monthly fee application (the “Second Combined Monthly Fee Application” or this “Application”) seeking compensation for services rendered and reimbursement of expenses incurred in its capacity as financial advisor for the Official Committee of Unsecured Creditors appointed in the above-referenced bankruptcy case (the “Committee”) for the period from July 1, 2023, through August 31, 2023 (the “Fee Period”). Pursuant to this Application, Dundon seeks allowance of compensation for professional services Dundon performed services during the Fee Period in the amount of \$33,803.00, less a twenty percent (20%) holdback in the amount of \$6,760.60, for an immediately payable fee request of \$27,042.40. Dundon did not incur expenses during the Fee Period. Immediately payable fees and expenses total to \$27,042.40. The statutory and legal predicates for the relief sought herein are sections 330, 331, and 1103 of chapter 11 title of title 11 of the United States Code, 11 U.S.C. § 101, et seq. (the “Bankruptcy Code”), Rule 2016(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2016 of the Local Rules of Bankruptcy Practice and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PlastiQ Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.

Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) and this Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 110] (the “Interim Compensation Order”). The total amount sought for fees represents 47.7 hours of professional services. In support of this Application, Dundon shows the Court the following:

I. BACKGROUND

1. On May 24, 2023 (the “Petition Date”), the Debtors each filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code.

2. The Debtors are entitled to, and upon information and belief of the undersigned continues to, operate and manage its businesses as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108. No request has been made for the appointment of a trustee or an examiner.

3. On June 7, 2023, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Committee pursuant to Bankruptcy Code section 1102 [D.I. 65]. The Committee consists of the following members: (i) Globant, LLC; (ii) Brex, Inc. and (iii) Bowei Liu.

4. On June 8, 2023, the Committee selected DLA Piper LLP to serve as its counsel, and on June 9, 2023, the Committee selected Dundon Advisers, LLC to serve as its financial advisor.

5. On July 24, 2023, this Court entered an *Order Approving Application Pursuant to 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Dundon Advisers LLC as Financial Advisor for the Committee* (the “Retention Order”) [D.I. 197], effective as of June 9, 2023.

II. JURISDICTION AND VENUE

6. This Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

7. The statutory predicates for the relief sought herein are sections 328(a) and 1103 of the Bankruptcy Code, and Bankruptcy Rule 2016.

III. RELIEF REQUESTED

8. Pursuant to the Retention Order, the Interim Compensation Order, and Sections 328(a), 330, and 331 of the Bankruptcy Code, Dundon seeks: allowance and payment of compensation for professional services Dundon performed during the Fee Period in the amount of \$33,803.00, less a twenty percent (20%) holdback in the amount of \$6,760.60, for an immediately payable fee request of \$27,042.40. Dundon did not incur expenses during the Fee Period. Immediately payable fees and expenses total to \$27,042.40.

9. Dundon has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the fees sought to be paid pursuant to this Application. With respect to the fees requested by Dundon, there is no agreement or understanding between Dundon and any other person, other than the members of the firm, for the sharing of compensation to be received for services rendered in this case.

10. All financial advisory services provided by Dundon during the Fee Period were performed on behalf of the Committee, and not on behalf of any other person or entity.

11. This is Dundon's Second Combined Monthly Fee Application.

IV. SUMMARY OF SERVICES RENDERED AND EXPENSES INCURRED

12. Dundon has maintained detailed records of the time spent in rendition of professional services to the Committee during the Fee Period. Attached hereto as Exhibit "A" and incorporated herein by reference are detailed time records for services rendered during the Fee Period. The time records include the date that the services were rendered, a detailed narrative description of the services provided, the amount of time spent for each service and the designation of the professional who performed the service.

13. Services rendered during the Fee Period can be grouped as follows:

<i>Categories</i>	<i>Hours</i>	<i>Fees</i>
Business Analysis	24.0	\$16,152.00
Case Administration	1.0	\$790.00
Claims Analysis	2.0	\$1,300.00
Committee Member/Professional Meetings & Communications	7.1	\$5,153.00
Debtor Professional and Client Meeting	0.0	\$0.00
Debtor/Lender Professional and Staff Meetings	0.0	\$0.00
Exit Planning and Post-Effective Date Planning	2.6	\$2,054.00
Investigations	0.0	\$0.00
Other Professionals' Retention and Fee Applications	0.0	\$0.00
Plan and Disclosure Statement	3.3	\$2,607.00
Retention and Fee Applications	4.5	\$3,555.00
Sales Process	3.2	\$2,192.00
Total	47.7	\$33,803.00

14. Dundon professionals have expended a total of 47.7 hours in connection with this matter during the Fee Period, as follows:

<i>Name</i>	<i>Rate</i>	<i>Hours</i>	<i>Fees</i>
Eric Reubel	\$790.00	11.0	\$ 8,690.00
Josh Nahas	790.00	19.7	\$ 15,563.00
Jillian Lin	\$650.00	2.0	\$ 1,300.00
Greg Hill	\$550.00	15.0	\$ 8,250.00
Chris Podesfinski	\$475.00	-	\$ -
Total		47.7	\$ 33,803.00

15. The following are summaries of the more material project categories for Dundon's professional services during the Fee Period:

a. Business Analysis

During the Fee Period Dundon personnel: (i) reviewed and analyzed insurance policies; (ii) reviewed and analyzed the Colonnade settlement offer; (iii) reviewed and analyzed proposals for settlements with the secured lender; (iv) conferred with the Debtor's financial advisers on a variety of issues; (v) reviewed and analyzed the proposed final debtor-in-possession ("DIP") financing and prepared a detailed analysis of prior comparable transactions; and (vi) reviewed and analyzed the Debtor's monthly operating reports.

Hours: 16.3 // Fees: \$10,597.00

b. Claims Analysis

During the Fee Period Dundon personnel: (i) preliminarily reviewed and analyzed the claims pool and (ii) potential post-effective date claims.

Hours: 2.0 // Fees: \$1,300.00

c. Meetings and Communications with Committee Members and Professionals

During the Fee Period Dundon personnel: (i) met frequently (over zoom, teleconference, or in-person), corresponded often over email and worked closely with committee counsel to develop and prepare case strategy; (ii) participated in regularly scheduled committee meeting; (iii) prepared analyses and presentations to support communications with committee members.

Hours: 7.9 // Fees: \$5,593.00

d. Exit and Post-Effective Date Planning

During the Fee Period Dundon personnel: (i) met frequently (over zoom, teleconference, or in-person) to prepare for establishing a post-confirmation trust.

Hours: 3.1 // Fees: \$2,329.00

e. Investigations

During the Fee Period Dundon personnel: (i) analyzed directors' and officers' insurance; (ii) analyzed solvency; (iii) analyzed and reviewed potential causes of action.

Hours: 2.8 // Fees: \$2,212.00

f. Plan and Disclosure Statement

During the Fee Period, Dundon personnel met frequently (over zoom, teleconference, or in-person) and corresponded often over email with the Debtor's professionals. Dundon personnel (i) reviewed and analyzed drafts of the proposed plan and disclosure statement; (ii) reviewed and analyzed drafts of the proposed liquidating trust agreement; (iii) attended hearings.

Hours: 6.4 // Fees: \$5,056.00

d. Retention and Fee Applications

During the Fee Period, Dundon personnel (i) attended to Dundon's retention application; (ii) prepared monthly fee applications.

Hours: 3.6 // Fees: \$2,844.00

d. Sale Process

During the Fee Period, Dundon personnel met frequently (over zoom, teleconference, or in-person) and corresponded often over email with the Debtor's investment bankers. Dundon personnel (i) reviewed and analyzed waterfalls based on sale proceeds and purchase price adjustments with respect to critical vendor payments and other adjustments; and (ii) monitored the contact log and qualified bidders.

Hours: 5.6 // Fees: \$3,872.00

16. Dundon did not incur any expenses in connection with Dundon's service as financial advisor to the Committee during the Fee Period and does not seek reimbursement of expenses in this Application.

17. Pursuant to Del. Bankr. L.R. 2016-2(e)(iii), Dundon charges no more than (i) \$0.10 per page for standard photocopies and (ii) actual cost for computer-assisted research. Dundon does not charge for outgoing or incoming facsimile transmissions. Dundon reserves the right to request, in subsequent fee applications, reimbursement of any additional expenses incurred during the Fee Period, as such expenses may not have been captured to date in Dundon's billing system.

V. NOTICE

Notice of this Application will be served upon each party to whom such notice is required under the Interim Compensation Order.

VI. CONCLUSION

WHEREFORE, Dundon hereby respectfully requests interim allowance of its fees in the amount of \$33,803.00, less a twenty percent (20%) holdback in the amount of \$6,760.60, for an immediately-payable fee request of \$27,042.40. Dundon did not incur any expenses during the Fee Period. Immediately-payable fees and expenses total to \$27,042.40.

Dated: September 18, 2023

DUNDON ADVISERS LLC

/s/ Eric A. Reubel

Eric A. Reubel

10 Bank Street, Suite 1100

White Plains, NY 10606

Telephone: (917) 626-4051

Email: er@dundon.com

*Financial Advisor to the Official Committee of
Unsecured Creditors*

Exhibit A**Billing Detail**

Timekeeper	Date	Description	Task Code	Hours	Rate	Fee
Reubel	7/3/2023	Correspond w/ D. O'Donnell re: KERP	Business Analysis	0.1	\$ 790	\$ 79.00
Nahas	7/3/2023	Review KERP motion and draft summary of final position on KERP	Business Analysis	0.5	\$ 790	\$ 395.00
Reubel	7/3/2023	Review Buyer news/update	Sales Process	0.1	\$ 790	\$ 79.00
Nahas	7/5/2023	Review revise retention application	Retention and Fee Applications	0.5	\$ 790	\$ 395.00
Reubel	7/5/2023	Attend to retention application	Retention and Fee Applications	0.1	\$ 790	\$ 79.00
Reubel	7/12/2023	Review J. Nahas email re: cash balance update	Business Analysis	0.1	\$ 790	\$ 79.00
Nahas	7/12/2023	Review and revise Dundon presentation for UCC members	Business Analysis	0.5	\$ 790	\$ 395.00
Hill	7/12/2023	Review and analysis of M&A sales funnel	Sales Process	0.9	\$ 550	\$ 495.00
Nahas	7/12/2023	Review updated sale funnel from Portage Point	Sales Process	0.5	\$ 790	\$ 395.00
Reubel	7/13/2023	Review W/E 7/13 variance report & follow-up email re: same	Business Analysis	0.2	\$ 790	\$ 158.00
Hill	7/13/2023	Review and analysis of latest variance reporting package	Business Analysis	1.6	\$ 550	\$ 880.00
Hill	7/13/2023	Participated in professionals call with Josh N of Dundon and Dennis of DLA	Business Analysis	0.5	\$ 550	\$ 275.00
Nahas	7/13/2023	Review and analyze weekly variance report and prepare summary for counsel	Business Analysis	0.8	\$ 790	\$ 632.00
Nahas	7/13/2023	Review final DIP order terms of Amex settlement with Blue Torch	Business Analysis	0.3	\$ 790	\$ 237.00
Nahas	7/13/2023	Review terms of Colonnade settlement in APA	Business Analysis	0.3	\$ 790	\$ 237.00
Reubel	7/13/2023	Attend UCC professionals call	Committee Member/Professional Meetings & Communications	0.5	\$ 790	\$ 395.00

Hill	7/13/2023	Participated in UCC call with Committee members and professionals from Dundon and DLA	Committee Member/Professional Meetings & Communications	0.5	\$ 550	\$ 275.00
Nahas	7/13/2023	Call with DLA/DA and UCC professionals	Committee Member/Professional Meetings & Communications	0.5	\$ 790	\$ 395.00
Nahas	7/13/2023	Pre-call with UCC professionals	Committee Member/Professional Meetings & Communications	0.5	\$ 790	\$ 395.00
Nahas	7/13/2023	Read and review combined plan and disclosure statement	Plan and Disclosure Statement	1.0	\$ 790	\$ 790.00
Nahas	7/14/2023	Call with E Reubel on Plastic case status update	Business Analysis	0.2	\$ 790	\$ 158.00
Reubel	7/14/2023	Review combined plan and DS	Plan and Disclosure Statement	0.9	\$ 790	\$ 711.00
Reubel	7/14/2023	Review sale process update (.1); telecon discussion w/ J. Nahas re: same (.2)	Sales Process	0.2	\$ 790	\$ 158.00
Reubel	7/17/2023	Review W/E 7/14 cash balance report	Business Analysis	0.1	\$ 790	\$ 79.00
Nahas	7/18/2023	Review and analyze debtor liquidation analysis and wind down	Plan and Disclosure Statement	1.0	\$ 790	\$ 790.00
Reubel	7/18/2023	Receive and analyze liquidation analysis	Plan and Disclosure Statement	0.6	\$ 790	\$ 474.00
Nahas	7/19/2023	Discussion with PPP on potential for a bid-by-bid deadline	Sales Process	0.2	\$ 790	\$ 158.00
Reubel	7/20/2023	Review and comment on variance report	Business Analysis	0.2	\$ 790	\$ 158.00
Reubel	7/20/2023	Review cash balance update	Business Analysis	0.1	\$ 790	\$ 79.00
Reubel	7/20/2023	Review "no bid" report	Sales Process	0.1	\$ 790	\$ 79.00
Hill	7/24/2023	Participated in UCC call with Committee members and professionals	Committee Member/Professional Meetings & Communications	0.5	\$ 550	\$ 275.00
Reubel	7/24/2023	Attend UCC call	Committee Member/Professional Meetings & Communications	0.5	\$ 790	\$ 395.00
Nahas	7/24/2023	Participate in UCC call	Committee Member/Professional Meetings & Communications	0.5	\$ 790	\$ 395.00
Reubel	7/25/2023	Correspond w/ J. Nahas re: June fee application	Retention and Fee Applications	0.1	\$ 790	\$ 79.00
Reubel	7/26/2023	Review D. O'Donnell email re: Colonnade offer and counter proposal	Business Analysis	0.1	\$ 790	\$ 79.00

Nahas	7/26/2023	Review Colonnade settlement offer	Business Analysis	0.2	\$ 790	\$ 158.00
Nahas	7/27/2023	Review insurance motion to compare to policies received from Debtor FA	Business Analysis	0.5	\$ 790	\$ 395.00
Hill	7/27/2023	Participated in UCC call with Committee members and professionals from Dundon and DLA	Committee Member/Professional Meetings & Communications	0.7	\$ 550	\$ 385.00
Nahas	7/27/2023	Participate in committee call with DLA/DA and members	Committee Member/Professional Meetings & Communications	0.7	\$ 790	\$ 553.00
Reubel	7/27/2023	Attend sale hearing/combined plan/DS hearing	Plan and Disclosure Statement	1.4	\$ 790	\$ 1,106.00
Reubel	7/27/2023	Attend to notice of rate increase	Retention and Fee Applications	0.3	\$ 790	\$ 237.00
Hill	7/27/2023	Participated in sale hearing	Sales Process	1.4	\$ 550	\$ 770.00
Nahas	7/27/2023	Participate in sale /combined plan DS hearing	Sales Process	1.4	\$ 790	\$ 1,106.00
Nahas	7/28/2023	Call with A Applebaum to discuss D&O claims	Business Analysis	0.3	\$ 790	\$ 237.00
Nahas	7/28/2023	Review D&O insurance coverage	Investigations	0.3	\$ 790	\$ 237.00
Hill	7/31/2023	Analysis of winddown budget	Business Analysis	2.3	\$ 550	\$ 1,265.00
Hill	7/31/2023	Review and analysis of docket filings	Business Analysis	0.1	\$ 550	\$ 55.00
Nahas	7/31/2023	Call with PPP, YCST, DLA and DA to discuss wind down budget	Business Analysis	0.1	\$ 790	\$ 79.00
Reubel	8/2/2023	Review final wind-down budget	Business Analysis	0.3	\$ 790	\$ 237.00
Hill	8/2/2023	Presentation of Debtors' winddown budget and cash balance	Business Analysis	0.5	\$ 550	\$ 275.00
Nahas	8/2/2023	Review UCC final wind down budget presentation	Business Analysis	0.5	\$ 790	\$ 395.00
Lin	8/2/2023	analysis of post reorg litigation and claims reconciliation	Claims Analysis	2.0	\$ 650	\$ 1,300.00
Hill	8/3/2023	Analysis of winddown budget and estate cash	Business Analysis	1.1	\$ 550	\$ 605.00
Nahas	8/3/2023	Telecon with G Hill to review waterfall of Amex and Colonnade settlement	Business Analysis	0.5	\$ 790	\$ 395.00

Reubel	8/3/2023	Attend UCC meeting	Committee Member/Professional Meetings & Communications	0.7	\$ 790	\$ 553.00
Hill	8/3/2023	Participated in UCC call with committee members and professionals from Dundno and DLA	Committee Member/Professional Meetings & Communications	0.7	\$ 550	\$ 385.00
Nahas	8/3/2023	Participate in UCC weekly call	Committee Member/Professional Meetings & Communications	0.7	\$ 790	\$ 553.00
Nahas	8/3/2023	Review final sale order	Sales Process	0.8	\$ 790	\$ 632.00
Nahas	8/7/2023	Call between DA/DLA/YCST to discuss claims pool estimates	Business Analysis	0.5	\$ 790	\$ 395.00
Reubel	8/7/2023	Prepare June fee application (2.5); correspond w/ A. Applebaum re: same (.1)	Retention and Fee Applications	2.6	\$ 790	\$ 2,054.00
Reubel	8/9/2023	Review draft equity objection and exhibits	Business Analysis	0.2	\$ 790	\$ 158.00
Hill	8/9/2023	Participated in call with Josh N. on post effective work	Exit and Post-Effective Date Planning	0.2	\$ 550	\$ 110.00
Hill	8/14/2023	Analysis of historical financial statements	Business Analysis	0.5	\$ 550	\$ 275.00
Hill	8/14/2023	participated in call with Josh N on trust work	Exit and Post-Effective Date Planning	0.3	\$ 550	\$ 165.00
Nahas	8/14/2023	Telecon with G Hill to discuss solvency in 2022-23 for litigation trust	Investigations	0.3	\$ 790	\$ 237.00
Nahas	8/14/2023	Review and analyze BS solvency of Plastiq in 2021, 2022 and 2023	Investigations	0.8	\$ 790	\$ 632.00
Nahas	8/14/2023	Prepare analysis of potential claims for litigation trust	Investigations	1.0	\$ 790	\$ 790.00
Nahas	8/14/2023	Telecon with DLA to discuss D&O insurance policy coverage	Investigations	0.4	\$ 790	\$ 316.00
Reubel	8/17/2023	Review Cash bridge	Business Analysis	0.2	\$ 790	\$ 158.00
Hill	8/17/2023	Analysis of estate cash, winddown and value left to the estate	Business Analysis	0.9	\$ 550	\$ 495.00
Hill	8/17/2023	Participated in weekly UCC call with Committee members and professionals from DLA and Dundon	Committee Member/Professional Meetings & Communications	0.3	\$ 550	\$ 165.00
Reubel	8/17/2023	Attend UCC meeting	Committee Member/Professional Meetings & Communications	0.3	\$ 790	\$ 237.00

Nahas	8/17/2023	Participate in weekly committee meeting	Committee Member/Professional Meetings & Communications	0.3	\$ 790	\$ 237.00
Hill	8/29/2023	Review and analysis of recent docket update	Business Analysis	0.1	\$ 550	\$ 55.00
Reubel	8/30/2023	Review draft causes of action	Exit and Post-Effective Date Planning	0.2	\$ 790	\$ 158.00
Nahas	8/30/2023	Call with KCC to discuss account, custody, payment and checking services	Exit and Post-Effective Date Planning	0.4	\$ 790	\$ 316.00
Nahas	8/30/2023	Read and review retained causes of action for Lit Trust	Exit and Post-Effective Date Planning	0.5	\$ 790	\$ 395.00
Nahas	8/30/2023	Read and review Litigation Trust Agreement	Plan and Disclosure Statement	0.7	\$ 790	\$ 553.00
Hill	8/31/2023	Review and analysis of monthly operating reports	Business Analysis	1.9	\$ 550	\$ 1,045.00
Nahas	8/31/2023	Call with D&O insurer on insurance pricing for Trustee role	Exit and Post-Effective Date Planning	0.5	\$ 790	\$ 395.00
Nahas	8/31/2023	Prepare budget estimate for trust funding	Exit and Post-Effective Date Planning	1.0	\$ 790	\$ 790.00
Reubel	8/31/2023	Review Liquidating Trust Agreement	Plan and Disclosure Statement	0.8	\$ 790	\$ 632.00

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

PLASTIQ, INC, *et al.*¹

Debtors.

Chapter 11

Case No. 23-10671 (BLS)

Obj. Deadline: October 9, 2023, at 4:00 p.m. (ET)

**NOTICE OF SECOND COMBINED MONTHLY FEE APPLICATION OF
DUNDON ADVISERS LLC, FINANCIAL ADVISOR FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR
THE PERIOD FROM JULY 1, 2023, TO AUGUST 31, 2023**

TO: The “Notice Parties” designated in the Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, Dated April 19, 2023 [Docket No. 110].

PLEASE TAKE NOTICE that on September 18, 2023, the Second Combined Monthly Fee Application of Dundon Advisors, Financial Advisor for the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors in possession (the “Debtors”), for Compensation and Reimbursement of Expenses for the Period from July 1, 2023, through August 31, 2023 (the “Fee Application”) was filed with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). By the Fee Application, Dundon Advisors LLC (“Dundon”) seeks the allowance and payment of interim compensation in the amount of \$27,042.40 (80% of \$33,803.00). Dundon did not incur any expenses in connection with Dundon’s service as financial advisor to the Committee during the period from July 1, 2023 through August 31, 2023 (the “Application Period”).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Fee Application must be filed with the Bankruptcy Court in accordance with the local rules and served upon the undersigned counsel on or before **October 9, 2023 at 4:00 p.m. (ET)**. Copies of the Fee Application are available upon written request to the undersigned. A hearing on the Fee Application shall be held only in the event timely objections are filed.

PLEASE TAKE FURTHER NOTICE that pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 199], in the absence of any objection or responsive pleading to the Fee Application, Dundon is authorized to file a Certificate of No Objection with the Bankruptcy Court, after which the Debtor is authorized and directed to pay Dundon an amount equal to \$27,042.40 (80% of \$33,803.00) and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PlastiQ Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.

100% of the expenses (\$0.00) requested in the Fee Application (the “Maximum Monthly Payment”). If an objection to the Fee Application is timely filed and served, the Debtor is authorized and directed to pay Dundon an amount equal to the lesser of (i) the Maximum Monthly Payment and (ii) 80% of the fees and 100% of the expenses not subject to an objection.

Dated: September 18, 2023
Wilmington, Delaware

DLA PIPER LLP (US)

/s/ Aaron S. Applebaum

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Unsecured Creditors*