#### IN THE UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

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STICKY'S HOLDINGS LLC, et al.,1

Debtors.

Chapter 11 (Subchapter V)

Case No. 24-10856 (JKS)

(Jointly Administered)

Objection Deadline: August 30, 2024, 4:00p ET

#### SECOND MONTHLY APPLICATION OF NATASHA M. SONGONUGA, SUBCHAPTER V TRUSTEE FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM JUNE 1, 2024 THROUGH JULY 31, 2024

**SUMMARY COVER SHEET** 

## Name of Applicant: Natasha M. Songonuga Authorized to Provide Professional Services as: Subchapter V Trustee ("SCV Trustee") Date of Appointment: April 25, 2024 [Docket No. 26] Period for which compensation and reimbursement June 1, 2024 – July 31, 2024 (the "Second is sought: Monthly Period") Amount of Compensation sought as actual, reasonable and necessary: \$8,400.00

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number are as follows: Sticky's Holdings LLC (3586); Sticky Fingers LLC (3212); Sticky Fingers II LLC (7125); Sticky Fingers III LLC (3914); Sticky Fingers IV LLC (9412); Sticky Fingers V LLC (1465); Sticky Fingers VI LLC (0578); Sticky's BK I LLC (0423); Sticky's NJ 1 LLC (5162); Sticky Fingers VII LLC (1491); Sticky's NJ II LLC (6642); Sticky Fingers IX LLC (5036); Sticky's NJ III LLC (7036); Sticky Fingers VIII LLC (0080); Sticky NJ IV LLC (6341); Sticky's WC 1 LLC (0427); Sticky's Franchise LLC (5232); Sticky's PA GK I LLC (7496); Stickys Corporate LLC (5719); and Sticky's IP LLC (4569). The Debtors' mailing address is 21 Maiden Lane, New York, NY 10038.

80% of Amount of Compensation sought as actual, reasonable and necessary:	\$6,720.00 (80% of above)
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$0.00
Petition Date:	April 25, 2024
Number of professionals and paraprofessionals included in this application:	2
Number of timekeepers billing fewer than 15 hours to the case during this period:	1
Blended Rate for all attorneys in this Application:	\$450.00
Blended Rate for all timekeepers in this Application	n: \$378.38
Are any rates higher than those approved or disclosed when appointed?	No
This is a(n) <b>x</b> monthly interim final application.	

The total time expended for fee application preparation during the Second Monthly Period is approximately 4.8 hour(s) and corresponding compensation requested is \$888.00. Any additional time expended on this fee application will be included in the Third Monthly Fee Application.

	SUMMARY OF APPLICATIONS							
	Date Period		Reques	Requested		and/or Paid		
#	Filed	Covered	Fees	Expenses	Fees	Expenses		
1	June 13, 2024	04/26/24 – 05/31/24	\$4,836.50	\$0.00	\$3,869.20	\$0.00		
2	August 9, 2024	06/01/24 – 07/31/24	\$8,400.00	\$0.00	\$6,720.00 Pending	\$0.00 Pending		
		TOTALS:	\$13,236.50	\$0.00	\$10,589.20	\$0.00		

COMPENSATION BY PROFESSIONAL or STAFF								
Role/ Name	Year Admitted or Years of Experience	Hourly Rate	Hours Billed	Total Compensation				
DIRECTOR:								
Natasha M. Songonuga ("NMS")	2009	\$450.00	16.2	\$7,290.00				
PARAPROFESSIONAL:								
Ellen Rosen (" <u>ER</u> ")	39 years	\$185.00	6.0	\$1,110.00				

Grand Total Compensation: \$8,400.00

Grand Total Hours: 22.20 Blended Rate: \$378.38

SUMMARY OF COMPENSATION BY PROJECT CATEGORY							
Project Category	Hours	Fees					
a) Case Administration (CA)	3.8	\$1,710.00					
b) Claims Analysis & Objections (CAO)	1.9	\$749.00					
c) Court Hearings including Preparation (CH)	1.1	\$283.00					
d) Creditor Inquiries (CI)	1.4	\$630.00					
e) Creditor Meetings and Negotiations (CM)	1.6	\$720.00					
f) Fee Applications/Monthly Billing (FA)	4.8	\$888.00					
g) Meetings	0.7	\$315.00					
h) Plan/Disclosure Statement	6.9	\$3,105.00					
SERVICES TOTAL:	22.2	\$8,400.00					

SUMMARY OF EXPENSE REIMBURSEMENT BY CATEGORY						
Category	Amount					
a) Online Research						
b) Delivery Service/Couriers						
c) Local Travel						
d) Meals (local)						
e) Filing/Court Fees						
f) Court Reporting (Hearings/Trial)						
g) Other (Explain						
TOTAL:		\$0.00				

# IN THE UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

In re:

STICKY'S HOLDINGS LLC, et al.,1

Debtors.

Chapter 11 (Subchapter V)

Case No. 24-10856 (JKS)

(Jointly Administered)

Objection Deadline: August 30, 2024, 4:00p ET

# SECOND MONTHLY APPLICATION OF NATASHA M. SONGONUGA, SUBCHAPTER V TRUSTEE FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM JUNE 1, 2024 THROUGH JULY 31, 2024

Pursuant to the Court's *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and the Subchapter V Trustee* [ECF 100], Natasha M. Songonuga, Subchapter V Trustee (the "<u>SCV Trustee</u>"), submits this Second Monthly application for compensation and reimbursement of expenses (the "<u>Application</u>") for approval pursuant to 11 U.S.C. §§ 330 and 331 of its interim compensation and reimbursement of expenses for the period from June 1, 2024 through July 31, 2024 (the "<u>Second Monthly Period</u>"). In support of this Application, the SCV Trustee respectfully represents as follows:

#### **BACKGROUND**

1. On April 25, 2024 (the "<u>Petition Date</u>"), the Debtors voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively, the "<u>Chapter 11 Case</u>"). The Debtors

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number are as follows: Sticky's Holdings LLC (3586); Sticky Fingers LLC (3212); Sticky Fingers II LLC (7125); Sticky Fingers III LLC (3914); Sticky Fingers IV LLC (9412); Sticky Fingers V LLC (1465); Sticky Fingers VI LLC (0578); Sticky's BK I LLC (0423); Sticky's NJ 1 LLC (5162); Sticky Fingers VII LLC (1491); Sticky's NJ II LLC (6642); Sticky Fingers IX LLC (5036); Sticky's NJ III LLC (7036); Sticky Fingers VIII LLC (0080); Sticky NJ IV LLC (6341); Sticky's WC 1 LLC (0427); Sticky's Franchise LLC (5232); Sticky's PA GK I LLC (7496); Stickys Corporate LLC (5719); and Sticky's IP LLC (4569). The Debtors' mailing address is 21 Maiden Lane, New York, NY 10038.

continue to operate their business and manage their properties as debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

- 2. No official committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code has been appointed in the Chapter 11 Case.
- 3. On April 26, 2024, the Office of the United States Trustee for Region 3 ("<u>U.S.</u> <u>Trustee</u>") filed a Notice of Appointment of Subchapter V Trustee appointing Natasha M. Songonuga as Subchapter V Trustee in the Chapter 11 Case [ECF 26] dated April 25, 2024.
- 4. On July 24, 2024, the Debtors filed the *Subchapter V Debtors' Plan of Reorganization* (the "Plan") [ECF 247]. A hearing to consider confirmation of the Debtors' Plan is scheduled for September 19, 2024.
- 5. All services for which compensation is requested herein by the SCV Trustee were performed in connection with her duties as SCV Trustee.

#### **SUMMARY OF SERVICES RENDERED**

6. Attached hereto as <u>Exhibit A</u> is a detailed statement of fees incurred during the Second Monthly Period, showing the amount of \$8,400.00 due for fees. The Subchapter V Trustee was recruited and hired by the Delaware office of Archer & Greiner P.C. ("Archer") starting in July of this year. However, the full migration of the Subchapter V Trustee's staff was not completed in July. As such the work performed during the Second Monthly Period is split between the SCV Trustee's time at VTrustee, LLC and Archer, as set forth in a combined version of the Subchapter V Trustee' time attached as <u>Exhibit A</u> plus the separate invoices for VTrustee LLC attached hereto as <u>Exhibit B1</u> and for Archer attached hereto as <u>Exhibit B2</u>.

- 7. The services rendered by the SCV Trustee during the Second Monthly Period are grouped into project categories as set forth in Exhibit A, including the number of hours and total compensation sought for each project category.
- 8. Services rendered by SCV Trustee during the Second Monthly Period include, but are not limited to, the following:
  - (a) performed the usual administrative services of a Subchapter V trustee with respect to (i) reviewing financial information provided by the Debtors, including Monthly Operating Reports; (ii) participated in a status conference scheduled in the Chapter 11 Case, and (iii) prepared for and attended the 341 meeting of creditors;
  - (b) communicated with and met with Debtors' counsel regarding plan issues;
  - (c) reviewed and analyzed Debtors' draft plan, projections, and solicitation documents; communications with U.S. Trustee's Office and Debtors' regarding same;
  - (d) communications with the U.S. Trustee's Office regarding case status and next steps;
  - (e) reviewed claims register and obtained copies of significant claims from claims agent;
  - (f) responded to creditors' inquiries, including review and analysis of numerous documents and email from one particularly significant creditor; and
  - (g) prepared and filed the SCV Trustee's First Monthly Fee Application.

#### **VALUATION OF SERVICES**

- 9. The SCV Trustee and her staff performed a total of 22.2 hours of work in connection with this matter during the Second Monthly Period.
- 10. The SCV Trustee believes that the time entries set forth in Exhibit A, as well as Exhibit B1 and Exhibit B2 attached hereto, are in compliance with the requirements of Del. Bankr. L.R. 2016-2.

- 11. Additionally, section 330 of the Bankruptcy Code sets forth the extent of compensation allowed to professionals employed under section 328. Under section 330(a), bankruptcy courts may award only reasonable compensation for actual, necessary services rendered by a professional. *See* 11 U.S.C. § 330(a). Reasonableness is based upon, among other things, (i) the nature of the services provided; (ii) the extent of the services; (iii) the value of the services; (iv) the time spent on the services; and (v) the cost of comparable services in non-bankruptcy cases. *See In re Busy Beaver Bldg. Ctrs., Inc.*, 19 F.3d 833, 840 (3d Cir. 1994); *In re Lan Assoc. IX, L.P.*, 192 F.3d 109, 122 (3d Cir. 1999).
- 12. The SCV Trustee respectfully submits that in accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested in this Application is fair and reasonable given (a) the complexity of the Chapter 11 Case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.
- 13. Pursuant to the Interim Compensation Order, no proposed form of Order is required with this monthly application.

#### **CONCLUSION**

WHEREFORE the SCV Trustee respectfully requests: (i) allowance be made to her in the total amount of \$8,400.00 as compensation for necessary professional legal services rendered as SCV Trustee during the Second Monthly Period; (ii) payment of 80% of the total compensation (\$6,720.00) to be paid upon filing a certificate of no objection pursuant to the Interim Compensation Order and for 100% reimbursement of actual and necessary costs and expenses incurred during the Second Monthly Period in the amount of \$0.00; and (iii) the granting of such other and further relief as the Court may deem just and proper.

Dated: August 9, 2024 ARCHER & GREINER P.C.

By: /s/ Natasha M. Songonuga

Natasha M. Songonuga, Esq. (Bar No. 5391)

Archer & Greiner P.C.

300 Delaware Avenue, Suite 1100

Wilmington, DE 19801 Phone: 302-356-6632

Email: nsongonuga@archerlaw.com

Subchapter V Trustee

#### **CERTIFICATE OF SERVICE**

I, Natasha M. Songonuga, hereby certify that on the 9th day of August 2024, I caused a true and correct copy of the *Second Monthly Application of Natasha M. Songonuga, Subchapter V Trustee for Compensation for Services Rendered and Reimbursement of Expenses for the Period from June 1, 2024 through July 31, 2024* to be served by email and regular U.S. Mail postage prepaid upon the Notice Parties included in the attached Service List and as identified in the Interim Compensation Order [ECF 100] as well as by means of the CM/ECF electronic filing system to all parties that have requested notice pursuant to Bankruptcy Rule 2002.

/s/ Natasha M. Songonuga

#### **SERVICE LIST**

#### VIA EMAIL and U.S. MAIL

#### **The Debtors**

Sticky's Holdings LLC 21 Maiden Lane New York, NY 10038 Attn: Jaime Greer

Email: jamie@stickys.com

#### **Counsel for the Debtors**

Pashman Stein Walder Hayden, P.C. 824 North Market Street, Suite 800 Wilmington, DE 19801 Attn: John W. Weiss Joseph C. Barsalona II Email: (jweiss@pashmanstein.com) (jbarsalona@pashmanstein.com)

Pashman Stein Walder Hayden, P.C. 1007 North Orange Street, 4th Floor, Suite #183, Wilmington, DE 19801-1242 Attn: Richard C. Solow Katherine R. Beilin Email: (rsolow@pashmanstein.com) (kbeilin@pashmanstein.com)

#### U.S. TRUSTEE

The Office of the U.S. Trustee Caleb Boggs Federal Building 844 King Street, Suite 2207 Lockbox 35, Wilmington, DE 19801, Attn: Joseph F. Cudia Jonathan W. Lipshie (joseph.cudia@usdoj.gov) (Jon.Lipshie@usdoj.gov)

# **EXHIBIT A**

		EXHIBIT A 2nd Monthly Fee Application					
Date	Service	Description	Team Member	Firm	Hours	Rate	Fee
7/8/2024	6 Case Administration	Attend to emails re meeting with Debtors' counsel.	Songonuga	Archer	0.1	\$450	\$45.00
7/8/2024	6 Case Administration	Prepare for meeting with Debtors' counsel.	Songonuga	Archer	0.3	\$450	\$135.00
7/11/2024	6 Case Administration	Confer with E. Rosen re case status and next steps.	Songonuga	Archer	0.2	\$450	\$90.00
7/12/2024	6 Case Administration	Telephone call with UST re case status and next steps.	Songonuga	Archer	0.3	\$450	\$135.00
7/15/2024	6 Case Administration	Exchange email with Debtors' counsel re case update.	Songonuga	Archer	0.1	\$450	\$45.00
7/15/2024	6 Case Administration	Telephone call with Debtors' counsel on filed MORs as well as plan issues.	Songonuga	Archer	0.7	\$450	\$315.00
7/15/2024	6 Case Administration	Draft email to UST re MORs.	Songonuga	Archer	0.2	\$450	\$90.00
7/16/2024	6 Case Administration	Review unredacted info re MORs.	Songonuga	Archer	0.5	\$450	\$225.00
7/16/2024	6 Case Administration	Exchange emails with UST re open issues and scheduling of conference call.	Songonuga	Archer	0.2	\$450	\$90.00
7/17/2024	6 Case Administration	Call with UST regarding MORs.	Songonuga	Archer	0.3	\$450	\$135.00
7/30/2024	6 Case Administration	Review Debtors' Motion for Extension of Time to Remove Causes of Action.	Songonuga	Archer	0.3	\$450	\$135.00
7/31/2024	6 Case Administration	Review/analyze MORs and draft email to Debtors' Counsel re same.	Songonuga	Archer	0.6	\$450	\$270.00
7/5/2024	4/105 Claims Analysis & Objections	Reviewed/analyzed numerous documents and emails from creditor P. Abrahamian and draft email to Debtors' counsel regarding meeting to discuss same.	Songonuga	Archer	1.4	\$450	\$630.00
7/16/2024	4/105 Claims Analysis & Objections	Review email from Debtors' counsel re responses on issues raised by creditor.	Songonuga	Archer	0.1	\$450	\$45.00
7/22/2024	4/105 Claims Analysis & Objections	Review claims register (0.1); email with claims agent to request and retrieve pdfs (0.1); review and receipt of nine claims (0.1); confer with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.4	\$185	\$74.00
6/15/2024	106 Court Hearings and Conferences	Review and receipt of 2nd Amended Agenda for 6/17 hearing and Certification of Counsel and Certificate of No Objection re: same (0.1); register N. Songonuga for the 6/17 hearing (0.1); confer and email with N. Songonuga re: filings and registration (0.1).	Rosen	VTrustee	0.3	\$185	\$55.50
6/17/2024	106 Court Hearings and Conferences	Attend status conference with Court.	Songonuga	VTrustee	0.3	\$450	\$135.00
7/19/2024	106 Court Hearings and Conferences	Review and receipt of CoC's and Order Setting Omnibus Hearing Dates; docket hearing dates (0.1); email with N. Songonuga re: same (0.1)	Rosen	VTrustee	0.2	\$185	\$37.00

Date	Service	Description	Team Member	Firm	Hours	Rate	Fee
7/26/2024	106 Court Hearings and Conferences	Review and receipt of recent filings (0.1); docket hearings and deadlines, including Confirmation-related deadlines (0.2)	Rosen	VTrustee	0.3	\$185	\$55.50
6/29/2024	107 Creditor Inquiries	Telephone call from creditor Paul Abrahamian.	Songonuga	VTrustee	1.4	\$450	\$630.00
6/10/2024	108 Creditors Meetings & Negotiations	Prepare for 341 meeting.	Songonuga	VTrustee	0.6	\$450	\$270.00
6/10/2024	108 Creditors Meetings & Negotiations	Attend 341 Meeting	Songonuga	VTrustee	1.0	\$450	\$450.00
6/10/2024	110 Fee Applications	Prepare Exhibit A for 1st Monthly Fee Application (0.9); confer with N. Songonuga re: same (0.1).	Rosen	VTrustee	1.0	\$185	\$185.00
6/11/2024	110 Fee Applications	Finalize 1st Monthly Fee Application and prepare for attorney review and filing (0.6); create required charts in support (0.5); audit Exhibit A time entries and narrative services description in 1st Monthly Fee Application(0.3); email with N. Songonuga re: same (0.1)	Rosen	VTrustee	1.5	\$185	\$277.50
6/13/2024	110 Fee Applications	Prepare 1st Monthly Fee Application for SCV Trustee for electronic filing (0.4); e-file same (0.2); review and receipt of as-filed version of same (0.1); coordinate email service re same (0.1); email with claims agent re: mail service; email with R. Solow re: same; email and confer with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.9	\$185	\$166.50
7/8/2024	110 Fee Applications	Draft Certification of No Objection re: SCV Trustee's 1st Monthly Fee Application (0.5); confer and email with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.6	\$185	\$111.00
7/8/2024	110 Fee Applications	Prepare Certificate of No Objection for 1st Monthly Fee Application of Subchapter V Trustee for electronic filing; file and serve same (0.1); review and receipt of as-filed version; confer and email with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.2	\$185	\$37.00
7/31/2024	110 Fee Applications	Draft portions of 2nd Monthly Fee Application, Notice, and Certificate of Service.	Rosen	VTrustee	0.6	\$185	\$111.00
7/8/2024	5 Meetings	Conference call with Debtors' counsel regarding issues raised by creditor and status of plan.	Songonuga	Archer	0.6	\$450	\$270.00
7/11/2024	5 Meetings	Draft email to US Trustee re request for meeting on creditor issue and plan status.	Songonuga	Archer	0.1	\$450	\$45.00
7/22/2024	22 Plan/Disclosure Statement	Review/analyze Debtors' draft plan, projections, and solicitation documents.	Songonuga	Archer	2.9	\$450	\$1,305.00
7/22/2024	22 Plan/Disclosure Statement	Draft email to UST re Plan and solicitation.	Songonuga	Archer	0.7	\$450	\$315.00

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			Team				
Date	Service	Description	Member	Firm	Hours	Rate	Fee
7/22/2024	22 Plan/Disclosure Statement	Draft email to Debtors' counsel outlining comments to draft plan.	Songonuga	Archer	0.4	\$450	\$180.00
7/23/2024	22 Plan/Disclosure Statement	Telephone call with Joe Cudio and Jon Lipshie of UST regarding solicitation issues.	Songonuga	Archer	0.3	\$450	\$135.00
7/23/2024	22 Plan/Disclosure Statement	Exchange several emails with Debtors' counsel on setting up call on solicitations.	Songonuga	Archer	0.2	\$450	\$90.00
7/24/2024	22 Plan/Disclosure Statement	Telephone conference with Debtors' counsel and UST on solicitation.	Songonuga	Archer	0.3	\$450	\$135.00
7/24/2024	22 Plan/Disclosure Statement	Review/analyze revised plan and solicitation documents.	Songonuga	Archer	0.4	\$450	\$180.00
7/24/2024	22 Plan/Disclosure Statement	Review and respond to emails from Debtors' counsel regarding revised solicitation documents.	Songonuga	Archer	0.2	\$450	\$90.00
7/25/2024	22 Plan/Disclosure Statement	Review Debtors' revised projections and email from Debtors' counsel regarding same.	Songonuga	Archer	0.1	\$450	\$45.00
7/25/2024	22 Plan/Disclosure Statement	Research and review decisions and articles on releases post Perdue Pharma.	Songonuga	Archer	1.4	\$450	\$630.00
			TOTALS		22.2	\$378.38	\$8,400.00
					HOURS	RATE	FEE
						(Blended)	
		VTRUSTEE	\$2,595.00	See also Exh B1			
		ARCHEF	\$5,805.00	See also Exh B2			
		TOTAL	\$8,400.00				

# **EXHIBIT B1**

	EXHIBIT B1 2nd Monthly Fee Application									
Date	Service	Description	Team Member	Firm	Hours	Rate	Fee			
7/22/2024	4/105 Claims Analysis & Objections	Review claims register (0.1); email with claims agent to request and retrieve pdfs (0.1); review and receipt of nine claims (0.1); confer with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.4	\$185	\$74.00			
6/15/2024	106 Court Hearings and Conferences	Review and receipt of 2nd Amended Agenda for 6/17 hearing and Certification of Counsel and Certificate of No Objection re: same (0.1); register N. Songonuga for the 6/17 hearing (0.1); confer and email with N. Songonuga re: filings and registration (0.1).	Rosen	VTrustee	0.3	\$185	\$55.50			
6/17/2024	106 Court Hearings and Conferences	Attend status conference with Court.	Songonuga	VTrustee	0.3	\$450	\$135.00			
7/19/2024	106 Court Hearings and Conferences	Review and receipt of CoC's and Order Setting Omnibus Hearing Dates; docket hearing dates (0.1); email with N. Songonuga re: same (0.1)	Rosen	VTrustee	0.2	\$185	\$37.00			
7/26/2024	106 Court Hearings and Conferences	Review and receipt of recent filings (0.1); docket hearings and deadlines, including Confirmation-related deadlines (0.2)	Rosen	VTrustee	0.3	\$185	\$55.50			
6/29/2024	107 Creditor Inquiries	Telephone call from creditor Paul Abrahamian.	Songonuga	VTrustee	1.4	\$450	\$630.00			
6/10/2024	108 Creditors Meetings & Negotiations	Prepare for 341 meeting.	Songonuga	VTrustee	0.6	\$450	\$270.00			
6/10/2024	108 Creditors Meetings & Negotiations	Attend 341 Meeting	Songonuga	VTrustee	1.0	\$450	\$450.00			
6/10/2024	110 Fee Applications	Prepare Exhibit A for 1st Monthly Fee Application (0.9); confer with N. Songonuga re: same (0.1).	Rosen	VTrustee	1.0	\$185	\$185.00			
6/11/2024	110 Fee Applications	Finalize 1st Monthly Fee Application and prepare for attorney review and filing (0.6); create required charts in support (0.5); audit Exhibit A time entries and narrative services description in 1st Monthly Fee Application(0.3); email with N. Songonuga re: same (0.1)	Rosen	VTrustee	1.5	\$185	\$277.50			
6/13/2024	110 Fee Applications	Prepare 1st Monthly Fee Application for SCV Trustee for electronic filing (0.4); e-file same (0.2); review and receipt of as-filed version of same (0.1); coordinate email service re same (0.1); email with claims agent re: mail service; email with R. Solow re: same; email and confer with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.9	\$185	\$166.50			
7/8/2024	110 Fee Applications	Draft Certification of No Objection re: SCV Trustee's 1st Monthly Fee Application (0.5); confer and email with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.6	\$185	\$111.00			

	EXHIBIT B1 2nd Monthly Fee Application  Team									
Date	Service	Description	Team Member	Firm	Hours	Rate	Fee			
7/22/2024	4/105 Claims Analysis & Objections	Review claims register (0.1); email with claims agent to request and retrieve pdfs (0.1); review and receipt of nine claims (0.1); confer with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.4	\$185	\$74.00			
6/15/2024	106 Court Hearings and Conferences	Review and receipt of 2nd Amended Agenda for 6/17 hearing and Certification of Counsel and Certificate of No Objection re: same (0.1); register N. Songonuga for the 6/17 hearing (0.1); confer and email with N. Songonuga re: filings and registration (0.1).	Rosen	VTrustee	0.3	\$185	\$55.50			
6/17/2024	106 Court Hearings and Conferences	Attend status conference with Court.	Songonuga	VTrustee	0.3	\$450	\$135.00			
7/19/2024	106 Court Hearings and Conferences	Review and receipt of CoC's and Order Setting Omnibus Hearing Dates; docket hearing dates (0.1); email with N. Songonuga re: same (0.1)	Rosen	VTrustee	0.2	\$185	\$37.00			
7/26/2024	106 Court Hearings and Conferences	Review and receipt of recent filings (0.1); docket hearings and deadlines, including Confirmation-related deadlines (0.2)	Rosen	VTrustee	0.3	\$185	\$55.50			
6/29/2024	107 Creditor Inquiries	Telephone call from creditor Paul Abrahamian.	Songonuga	VTrustee	1.4	\$450	\$630.00			
6/10/2024	108 Creditors Meetings & Negotiations	Prepare for 341 meeting.	Songonuga	VTrustee	0.6	\$450	\$270.00			
6/10/2024	108 Creditors Meetings & Negotiations	Attend 341 Meeting	Songonuga	VTrustee	1.0	\$450	\$450.00			
6/10/2024	. 110 Fee Applications	Prepare Exhibit A for 1st Monthly Fee Application (0.9); confer with N. Songonuga re: same (0.1).	Rosen	VTrustee	1.0	\$185	\$185.00			
6/11/2024	110 Fee Applications	Finalize 1st Monthly Fee Application and prepare for attorney review and filing (0.6); create required charts in support (0.5); audit Exhibit A time entries and narrative services description in 1st Monthly Fee Application(0.3); email with N. Songonuga re: same (0.1)	Rosen	VTrustee	1.5	\$185	\$277.50			
6/13/2024	110 Fee Applications	Prepare 1st Monthly Fee Application for SCV Trustee for electronic filing (0.4); e-file same (0.2); review and receipt of as-filed version of same (0.1); coordinate email service re same (0.1); email with claims agent re: mail service; email with R. Solow re: same; email and confer with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.9	\$185	\$166.50			
7/8/2024	110 Fee Applications	Draft Certification of No Objection re: SCV Trustee's 1st Monthly Fee Application (0.5); confer and email with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.6	\$185	\$111.00			

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			Team				
Date	Service	Description	Member	Firm	Hours	Rate	Fee
7/8/2024	110 Fee Applications	Prepare Certificate of No Objection for 1st Monthly Fee Application of Subchapter V Trustee for electronic filing; file and serve same (0.1); review and receipt of as-filed version; confer and email with N. Songonuga re: same (0.1).	Rosen	VTrustee	0.2	\$185	\$37.00
7/31/2024	110 Fee Applications	Draft portions of 2nd Monthly Fee Application, Notice, and Certificate of Service.	Rosen	VTrustee	0.6	\$185	\$111.00
			TOTALS		9.3	\$279.03	\$2,595.00
					HOURS	RATE	FEE
						(Blended)	

# **EXHIBIT B2**

#### ARCHER & GREINER

ATTORNEYS AT LAW 1025 LAUREL OAK ROAD VOORHEES, NEW JERSEY 08043 (856-795-2121)

NATASHA M. SONGONUGA, TRUSTEE Invoice Date: 08/31/24
ARCHER & GREINER, P.C. Client Number: SON040

300 DELAWARE AVENUE

SUITE 1100 Matter Number: SON040.00971

WILMINGTON, DE 19801

#### For Professional Services Rendered Through 07/31/2024

#### Task Summary

Time Summary by Task						
Code	Description	Hours	Value			
22	PLAN/DISCLOSURE STATEMENT	6.90	3,105.00			
4	CLAIMS ANALYSIS AND OBJECTIONS	1.50	675.00			
5	MEETINGS	0.70	315.00			
6	CASE ADMINISTRATION	3.80	1,710.00			
	TOTAL FEES	12.90	5,805.00			
	TOTAL INVOICE	5,805.00				

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SON040 SONGONUGA, NATASHA M. -- SUBCHAPTER V Invoice Number:

TRUSTEE

SON040.00971 IN RE: STICKY'S HOLDINGS LLC, ET AL., DEBTORS /

CHAPTER 11

Date	Description	Task	Hours Name	Fees
07/22/24	Review/analyze Debtors' draft plan, projections, and solicitations documents.	22	2.9 N. M. Songonuga	1,305.00
07/22/24	Draft email to UST re Plan and solicitation.	22	0.7 N. M. Songonuga	315.00
07/22/24	Draft email to Debtors' counsel outlining comments to draft plan.	22	0.4 N. M. Songonuga	180.00
07/23/24	Telephone call with Joe Cudio and Jon Lipshie of UST regarding solicitation issues.	22	0.3 N. M. Songonuga	135.00
07/23/24	Exchange several emails with Debtors' counsel on setting up call on solicitations.	22	0.2 N. M. Songonuga	90.00
07/24/24	Telephone conference with Debtors' counsel and UST on solicitation.	22	0.3 N. M. Songonuga	135.00
07/24/24	Review/analyze revised plan and solicitation documents.	22	0.4 N. M. Songonuga	180.00
07/24/24	Review and respond to emails from Debtors' counsel regarding revised solicitation documents.	22	0.2 N. M. Songonuga	90.00
07/25/24	Review Debtors' revised projections and email from Debtors' counsel regarding same.	22	0.1 N. M. Songonuga	45.00
07/25/24	Research and review decisions and articles on releases post Perdue Pharma.	22	1.4 N. M. Songonuga	630.00
	PLAN/DISCLOSURE STATEMENT TOTAL		6.9	3,105.00

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SON040 SONGONUGA, NATASHA M. -- SUBCHAPTER V Invoice Number:

TRUSTEE

SON040.00971 IN RE: STICKY'S HOLDINGS LLC, ET AL., DEBTORS /

CHAPTER 11

Date	Description	Task	Hours	Name	Fees
07/05/24	Reviewed/analyzed numerous documents and emails from creditor P. Abrahamian and draft email to Debtors' counsel regarding meeting to discuss same.	4	1.4 N	I. M. Songonuga	630.00
07/16/24	Review email from Debtors' counsel re responses on issues raised by creditor.	4	0.1 N	. M. Songonuga	45.00
CI	LAIMS ANALYSIS AND OBJECTIONS TOTAL		1.5		675.00

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SON040 SONGONUGA, NATASHA M. -- SUBCHAPTER V Invoice Number:

TRUSTEE

SON040.00971 IN RE: STICKY'S HOLDINGS LLC, ET AL., DEBTORS /

CHAPTER 11

Date	Description	Task	Hours	Name	Fees
07/08/24	Conference call with Debtors' counsel regarding issues raised by creditor and status of plan.	5	0.6 N. M	1. Songonuga	270.00
07/11/24	Draft email to US Trustee re request for meeting on creditor issue and plan status.	5	0.1 N. M	1. Songonuga	45.00
	MEETINGS TOTAL		0.7		315.00

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SON040 SONGONUGA, NATASHA M. -- SUBCHAPTER V Invoice Number:

TRUSTEE

SON040.00971 IN RE: STICKY'S HOLDINGS LLC, ET AL., DEBTORS /

CHAPTER 11

Date	Description	Task	Hours Name	Fees
07/08/24	Attend to emails re meeting with Debtors' counsel.	6	0.1 N. M. Songonuga	45.00
07/08/24	Prep for meeting with Debtors' counsel.	6	0.3 N. M. Songonuga	135.00
07/11/24	Confer with E. Rosen re case status and next steps.	6	0.2 N. M. Songonuga	90.00
07/12/24	Telephone call with UST re case status and next steps.	6	0.3 N. M. Songonuga	135.00
07/15/24	Exchange email with Debtors' counsel re case update.	6	0.1 N. M. Songonuga	45.00
07/15/24	Telephone call with Debtors' counsel on filed MORs as well as plan issues.	6	0.7 N. M. Songonuga	315.00
07/15/24	Draft email to UST re MORs.	6	0.2 N. M. Songonuga	90.00
07/16/24	Review unredacted info re MORs.	6	0.5 N. M. Songonuga	225.00
07/16/24	Exchange emails with UST re open issues and scheduling of conference call.	6	0.2 N. M. Songonuga	90.00
07/17/24	Call with UST regarding MORs.	6	0.3 N. M. Songonuga	135.00
07/30/24	Review Debtors' Motion for Extension of Time to Remove Causes of Action.	6	0.3 N. M. Songonuga	135.00
07/31/24	Review/analyze MORs and draft email to Debtors' Counsel re same.	6	0.6 N. M. Songonuga	270.00
	CASE ADMINISTRATION TOTAL		3.8	1,710.00
TOTAL FEES				\$5,805.00

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SON040 SONGONUGA, NATASHA M. -- SUBCHAPTER V Invoice Number:

TRUSTEE

SON040.00971 IN RE: STICKY'S HOLDINGS LLC, ET AL., DEBTORS /

CHAPTER 11

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# IN THE UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

In re:

STICKY'S HOLDINGS LLC, et al.,1

Debtors.

Chapter 11 (Subchapter V)

Case No. 24-10856 (JKS)

(Jointly Administered)

Objection Deadline: August 30, 2024, 4:00p ET

#### NOTICE OF SECOND MONTHLY FEE APPLICATION

PLEASE TAKE NOTICE that on August 9, 2024, Natasha M. Songonuga, Subchapter V Trustee in the above-captioned Subchapter V Chapter 11 case, (the "SCV Trustee") filed the Second Monthly Application of Natasha M. Songonuga, Subchapter V Trustee for Compensation for Services Rendered and Reimbursement of Expenses for the Period from June 1, 2024 through July 31, 2024 (the "Second Monthly Fee Application") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Second Monthly Fee Application must be (a) in writing and served on or before August 30, 2024 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline"); (b) filed with the Clerk of the United States Bankruptcy Court for District of Delaware; and (c) served as to be received on or before the Objection Deadline by the undersigned.

PLEASE TAKE FURTHER NOTICE THAT IF OBJECTIONS ARE TIMELY FILED OR THE COURT SO ORDERS, A HEARING ON THE SECOND MONTHLY FEE APPLICATION MAY BE SET BEFORE THE HONORABLE J. KATE STICKLES, UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET ST., 3<sup>rd</sup> FLOOR COURTROOM 6, WILMINGTON, DE 19801.

PLEASE TAKE FURTHER NOTICE THAT ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE PROCEDURES ABOVE WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING.

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number are as follows: Sticky's Holdings LLC (3586); Sticky Fingers LLC (3212); Sticky Fingers II LLC (7125); Sticky Fingers III LLC (3914); Sticky Fingers IV LLC (9412); Sticky Fingers V LLC (1465); Sticky Fingers VI LLC (0578); Sticky's BK I LLC (0423); Sticky's NJ 1 LLC (5162); Sticky Fingers VII LLC (1491); Sticky's NJ II LLC (6642); Sticky Fingers IX LLC (5036); Sticky's NJ III LLC (7036); Sticky Fingers VIII LLC (0080); Sticky NJ IV LLC (6341); Sticky's WC 1 LLC (0427); Sticky's Franchise LLC (5232); Sticky's PA GK I LLC (7496); Stickys Corporate LLC (5719); and Sticky's IP LLC (4569). The Debtors' mailing address is 21 Maiden Lane, New York, NY 10038.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE SECOND MONTHLY FEE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: August 9, 2024 ARCHER & GREINER, P.C.

By: /s/ Natasha M. Songonuga (Bar No. 5391) Natasha M. Songonuga, Esq.

Archer & Greiner P.C. 300 Delaware Avenue

Suite 1100

Wilmington, DE 19801 Phone: 302-356-6632

Email: nsongonuga@archerlaw.com

Subchapter V Trustee