

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

---

In re:	)	
	)	Chapter 11
Liquidating Supply, Inc., <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 24-11054 (BLS)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Obj. Deadline: Sept. 5, 2024 at 4:00 p.m. (ET)
	)	Hearing Date: <i>Only if objections are filed</i>

---

**SECOND MONTHLY FEE APPLICATION OF DUNDON ADVISERS, LLC,  
CO-FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF  
EXPENSES FOR THE PERIOD FROM JULY 1, 2024 THROUGH JULY 31, 2024**

---

Name of Applicant:	<b>Dundon Advisers LLC</b>
Authorized to provide professional services to:	<b>The Official Committee of Unsecured Creditors</b>
Date of retention:	<b>July 22, 2024, effective as of June 7, 2025</b>
Period for which compensation and reimbursement is sought:	<b>July 1, 2024 through July 31, 2024</b>
Amount of compensation sought as actual, reasonable and necessary:	<b>\$30,309.20 (80% of \$37,886.50)</b>
Amount of expense reimbursement sought as actual, reasonable and necessary:	<b>\$0</b>
This is a:	<b>Second Monthly Fee Application</b>

---

<sup>1</sup> The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor's federal tax identification number, are: Liquidating Supply, Inc. (f/k/a Supply Source Enterprises, Inc.) (0842); SSE Intermediate, Inc. (1772); SSE Buyer, Inc. (5901); Liquidating Impact, LLC (f/k/a Impact Products, LLC) (7450); and Liquidating SZ, LLC (f/k/a The Safety Zone, LLC) (4597). The Debtors' headquarters are located at 2840 Centennial Drive, Toledo, Ohio 43617.



**PRIOR APPLICATIONS**

		<b>Requested</b>		<b>Approved</b>		
<b>Date Filed</b>	<b>Period Covered</b>	<b>Fees</b>	<b>Expenses</b>	<b>Fees [80%]</b>	<b>Expenses [100%]</b>	<b>Fee Holdback</b>
First Monthly Filed 7/26/2024 Docket No. 263	6/7/2024- 6/30/2024	\$129,941.50	\$0.00	\$103,953.20	\$0.00	\$25,988.30

**LIQUIDATING SUPPLY, INC., *ET AL.***  
**SUMMARY OF BILLING BY PROFESSIONAL**  
**JULY 1, 2024 THROUGH JULY 31, 2024**

<b>Professional</b>	<b>Title</b>	<b>Hourly Billing Rate</b>	<b>Total Hours</b>	<b>Fees</b>
Matthew Dundon	Principal	\$960	1.9	\$1,824.00
Joshua Nahas	Managing Director	\$850	17.1	\$14,535.00
Ming Shen	Managing Director	\$850	0.0	\$0.00
Jennifer Ganzi	Senior Director	\$755	6.1	\$4,605.50
Gregory Hill	Director	\$700	0.5	\$350.00
Christopher Podesfinski	Senior Associate	\$485	23.2	\$11,252.00
Irene Byun	Associate	\$350	15.2	\$5,320.00
<b>Total</b>			<b>64.00</b>	<b>\$37,886.50</b>

**LIQUIDATING SUPPLY, INC., *ET AL.***  
**COMPENSATION BY PROJECT CATEGORY**  
**JULY 1, 2024 THROUGH JULY 31, 2024**

<b>Project Category</b>	<b>Total Hours</b>	<b>Fees</b>
Business Analysis	51.2	\$29,141.00
Case Administration	0.1	\$48.50
Committee Member/Professional Meetings & Communications	3.8	\$2,932.50
Exit and Post-Effective Date Planning	1.2	\$1,152.00
Retention and Fee Applications	7.7	\$4,612.50
	<b>64.00</b>	<b>\$37,886.50</b>

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

---

In re:	)	
	)	Chapter 11
Liquidating Supply, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 24-11054 (BLS)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Obj. Deadline: Sept. 5, 2024 at 4:00 p.m. (ET)</b>
	)	<b>Hearing Date: <i>Only if objections are filed</i></b>

---

**SECOND MONTHLY FEE APPLICATION OF DUNDON ADVISERS, LLC,  
CO-FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF  
EXPENSES FOR THE PERIOD FROM JULY 1, 2024 THROUGH JULY 31, 2024**

---

Dundon Advisers, LLC (the “Applicant” or “Dundon”), as co-financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) of Liquidating Supply, Inc. (f/k/a Supply Source Enterprises, Inc.) and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases, hereby applies, pursuant to (i) sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), (ii) Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (iii) Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and (iv) the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and Granting Related Relief [Docket No. 124] (the “Interim Compensation Order”),<sup>2</sup> for allowance of

---

<sup>1</sup> The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: Liquidating Supply, Inc. (f/k/a Supply Source Enterprises, Inc.) (0842); SSE Intermediate, Inc. (1772); SSE Buyer, Inc. (5901); Liquidating Impact, LLC (f/k/a Impact Products, LLC) (7450); and Liquidating SZ, LLC (f/k/a The Safety Zone, LLC) (4597). The Debtors’ headquarters are located at 2840 Centennial Drive, Toledo, Ohio 43617.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Interim Compensation Order.

compensation for services rendered and reimbursement of expenses for the period from July 1, 2024 through July 31, 2024 (the “Application Period”), and respectfully represents as follows:

### **JURISDICTION**

1. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-2.

### **BACKGROUND**

#### **A. The Chapter 11 Cases**

3. On May 21, 2024 (the “Petition Date”), the Debtors filed with this Court voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

4. The Debtors have continued in the possession of their property and have continued to operate and manage their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. No trustee or examiner has been appointed in these chapter 11 cases.

6. On June 3, 2024, the United States Trustee for Region 3 (the “U.S. Trustee”) appointed a five-member Committee consisting of: (i) Jiangsu Bytech Medical Supplies Co., Ltd.; (ii) Xiantao Crosscare Protective Products Co., Ltd.; (iii) Xiantao Deming Healthcare Products Co., Ltd.; (iv) Hiten Nonwoven Healthcare Products (Hubei) Ltd.; and (v) Xiantao Yilin Protective Products Co., Ltd.

**B. Dundon's Retention**

7. On June 26, 2024, the Committee filed an application [Docket No. 196] with the Court for an order authorizing it to retain and employ Dundon as its financial advisor, effective as of June 7, 2024. On July 22, 2024, the Court entered an order [Docket No. 247] authorizing such retention.

**C. The Interim Compensation Order**

8. On June 13, 2024, the Court entered the Interim Compensation Order, which sets forth the procedures for interim compensation and reimbursement of expenses in these Chapter 11 Cases.

9. Among other things, the Interim Compensation Order provides that if there are no objections to a Monthly Fee Application filed within fourteen (14) days after the service of that Monthly Fee Application, the Retained Professional may file a certificate of no objection with the Court, after which the Debtors are authorized to pay such Retained Professional eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such Monthly Fee Application. If an objection is filed to the Monthly Fee Application and the parties cannot reach a consensual resolution, the Debtors are authorized to pay 80% of the fees and 100% of the expenses not subject to an unresolved objection.

**RELIEF REQUESTED**

10. Pursuant to the Interim Compensation Order and section 331 of the Bankruptcy Code, Dundon is seeking compensation in the amount of \$30,309.20, which is equal to eighty percent (80%) of \$37,886.50 in fees for professional services rendered by Dundon during the Application Period. This amount is derived solely from the applicable hourly billing rates of Dundon personnel, who rendered services to the Committee.

**Professional Services Rendered**

11. Attached hereto as Exhibit A is a detailed itemization, by professional, of all services performed by Dundon with respect to the chapter 11 cases during the Application Period. This detailed itemization complies with Local Rule 2016-2(d) in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically within each grouping, and all meetings or hearings are individually identified.

12. The professionals who rendered services related to each category are identified on Exhibit A, along with the number of hours for each individual.

13. None of the services rendered were duplicative with the work of Foresight Restructuring

**Valuation of Services**

14. Professionals of Dundon have expended a total of 64.00 hours in connection with this matter during the Application Period.

15. The amount of time spent by each of the professionals providing services to the Committee for the Application Period is set forth in Exhibit A. The rates are Dundon's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered Dundon for the Application Period as financial advisor for the Committee in these Chapter 11 Cases is \$37,886.50.

16. Dundon believes that the time entries included in Exhibit A are in compliance with Local Rule 2016-2.

17. In accordance with the factors enumerated in 11 U.S.C. § 330, the amount requested is fair and reasonable given (a) the complexity of these Chapter 11 cases, (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.

**No Prior Request**

18. No prior request for the relief requested in this Application has been made to this or any other court.

**Certificate of Compliance and Request for Waiver**

19. The undersigned representative of Dundon certifies that he has reviewed the requirements of Local Rule 2016-2, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-2, Dundon believes that such deviations are not material and respectfully requests that any such requirements be waived.

WHEREFORE, Dundon respectfully requests (a) allowance of compensation for professional services rendered to the Committee during the Application Period in the amount of \$30,309.20 (80% of \$37,886.50) (b) payment by the Debtors of the foregoing amounts; and (c) such other and further relief as the Court deems just and proper.

Dated: August 22, 2024  
Wilmington, Delaware

*/s/ Joshua Nahas*

---

Joshua Nahas  
**Dundon Advisers, LLC**  
10 Bank Street, Suite 1100  
White Plains, New York 10606  
Telephone: (914) 341-1188  
Email: jn@dundon.com

*Co-Financial Advisor to the Official Committee of  
Unsecured Creditors*

**Exhibit A****Time Detail**

<b>Timekeeper</b>	<b>Date</b>	<b>Category</b>	<b>Description</b>	<b>Time</b>	<b>Rate</b>	<b>Fee</b>
Christopher Podesfinski	07/02/2024	Business Analysis	Review claims register	0.20	485.00	\$97.00
Christopher Podesfinski	07/02/2024	Business Analysis	Attend continued 341 meeting	2.50	485.00	\$1,212.50
Christopher Podesfinski	07/03/2024	Business Analysis	Follow-up regarding lease rejection damages	0.20	485.00	\$97.00
Christopher Podesfinski	07/05/2024	Business Analysis	Assist JG with updates to vendor recovery presentation	1.00	485.00	\$485.00
Christopher Podesfinski	07/05/2024	Business Analysis	Calls with JN regarding communications to counsel; updates to vendor recovery presentation	0.30	485.00	\$145.50
Christopher Podesfinski	07/05/2024	Business Analysis	Responses to Committee counsel questions	0.40	485.00	\$194.00
Christopher Podesfinski	07/08/2024	Business Analysis	Prepare communication to Committee members regarding their questions on 503b9/critical vendor presentation	1.00	485.00	\$485.00
Christopher Podesfinski	07/08/2024	Business Analysis	Call with JN regarding responses to Committee members (503b9/critical vendor)	0.30	485.00	\$145.50
Christopher Podesfinski	07/08/2024	Business Analysis	Call with JN reviewing APA amendment	0.40	485.00	\$194.00
Christopher Podesfinski	07/08/2024	Business Analysis	Review APA, DIP redline, and Amendment	1.30	485.00	\$630.50
Christopher Podesfinski	07/08/2024	Business Analysis	Provide commentary on budget and variances to counsel	0.30	485.00	\$145.50
Christopher Podesfinski	07/08/2024	Case Administration	Scheduling bar date notifications for team	0.10	485.00	\$48.50
Christopher Podesfinski	07/09/2024	Business Analysis	Review TSA and WD budgets	0.40	485.00	\$194.00
Christopher Podesfinski	07/09/2024	Business Analysis	Review lease rejection analysis and lease rejection motion	0.30	485.00	\$145.50
Christopher Podesfinski	07/09/2024	Business Analysis	Prepare response to counsel's question about impact of lease rejection on potential recoveries	0.30	485.00	\$145.50
Christopher Podesfinski	07/09/2024	Business Analysis	Respond to counsel's question regarding delta in claims by Committee member analysis	0.60	485.00	\$291.00
Christopher Podesfinski	07/09/2024	Business Analysis	Review Rule 2019 statement	0.30	485.00	\$145.50
Christopher Podesfinski	07/10/2024	Business Analysis	QA and incremental updates to variance analysis presentation	1.60	485.00	\$776.00
Christopher Podesfinski	07/12/2024	Business Analysis	Prep for call with Portage Point discussing go forward budgets	0.30	485.00	\$145.50

Timekeeper	Date	Category	Description	Time	Rate	Fee
Christopher Podesfinski	07/12/2024	Business Analysis	Call with PPP to discuss TSA/WD and liquidating trust budgets (with JN)	0.40	485.00	\$194.00
Christopher Podesfinski	07/17/2024	Business Analysis	Review data room and emails for latest variance report	0.10	485.00	\$48.50
Christopher Podesfinski	07/18/2024	Business Analysis	Review draft of plan term sheet	0.30	485.00	\$145.50
Christopher Podesfinski	07/18/2024	Business Analysis	Call with counsel reviewing plan term sheet; providing feedback (with JN)	0.20	485.00	\$97.00
Christopher Podesfinski	07/18/2024	Business Analysis	QA and updates to variance analysis for the weeks ending 7/5 and 7/12	2.10	485.00	\$1,018.50
Christopher Podesfinski	07/19/2024	Retention and Fee Applications	Review fee application process with GH	0.50	485.00	\$242.50
Christopher Podesfinski	07/21/2024	Retention and Fee Applications	Create v1 of first monthly fee application	2.00	485.00	\$970.00
Christopher Podesfinski	07/21/2024	Retention and Fee Applications	Call with JN regarding categorization of certain workstreams	0.20	485.00	\$97.00
Christopher Podesfinski	07/21/2024	Retention and Fee Applications	Incremental updates to first monthly fee application	0.20	485.00	\$97.00
Christopher Podesfinski	07/22/2024	Retention and Fee Applications	Incremental updates to application for "Exhibit A" and summaries by category and professional	1.60	485.00	\$776.00
Christopher Podesfinski	07/22/2024	Retention and Fee Applications	Recategorize project categories to better fit descriptions	0.20	485.00	\$97.00
Christopher Podesfinski	07/23/2024	Business Analysis	QA and incremental updates to June 2024 MOR presentation	1.60	485.00	\$776.00
Christopher Podesfinski	07/24/2024	Retention and Fee Applications	Incremental updates for first monthly fee application per MD/MS	0.60	485.00	\$291.00
Christopher Podesfinski	07/25/2024	Business Analysis	Review combined plan and disclosure statement	1.20	485.00	\$582.00
Christopher Podesfinski	07/29/2024	Business Analysis	Call with JN regarding plan/disclosure statement	0.20	485.00	\$97.00
<b>Totals for Christopher Podesfinski</b>				<b>23.20</b>		<b>\$11,252.00</b>
Gregory Hill	07/19/2024	Retention and Fee Applications	Call with Chris P on reviewing drafting application fee	0.50	\$700.00	\$350.00
<b>Total For Gregory Hill</b>				<b>0.50</b>		<b>\$350.00</b>

Timekeeper	Date	Category	Description	Time	Rate	Fee
------------	------	----------	-------------	------	------	-----

Irene Byun	07/02/2024	Business Analysis	341 Meeting	2.30	\$350.00	\$805.00
Irene Byun	07/09/2024	Business Analysis	Variance Report (WE 06.28.24)	3.70	\$350.00	\$1,295.00
Irene Byun	07/10/2024	Committee Member/Professional Meetings & Communications	Committee Call	0.50	\$350.00	\$175.00
Irene Byun	07/17/2024	Business Analysis	Week 3&4 Variance	2.00	\$350.00	\$700.00
Irene Byun	07/23/2024	Business Analysis	June MOR Excel	3.20	\$350.00	\$1,120.00
Irene Byun	07/23/2024	Business Analysis	June MOR Presentation	2.00	\$350.00	\$700.00
Irene Byun	07/26/2024	Business Analysis	Disclosure Statement Analysis	1.50	\$350.00	\$525.00
<b>Totals for Irene Byun</b>				<b>15.20</b>		<b>\$5,320.00</b>
Jennifer Ganzi	07/02/2024	Business Analysis	Attended 341 Meeting via phone.	2.50	\$755.00	\$1,887.50
Jennifer Ganzi	07/05/2024	Business Analysis	Anonymized data to recreate recovery analysis for Top 30 Creditors/Critical Vendors, worked with Chris P. to find relevant information, and reformatted documents to fit in existing presentation. Edited certain information within non-anonymized information.	2.00	\$755.00	\$1,510.00
Jennifer Ganzi	07/08/2024	Business Analysis	Downloaded new documents from data room, and analyzed said documents.	0.30	\$755.00	\$226.50
Jennifer Ganzi	07/09/2024	Business Analysis	For the amendment to the APA, analyzed the documents surrounding confusing language regarding the \$805K hurdle for Excess Cash distributions.	0.30	\$755.00	\$226.50
Jennifer Ganzi	07/09/2024	Business Analysis	Worked with Chris P. on impact of rejected lease claim to GUC pool.	0.20	\$755.00	\$151.00
Jennifer Ganzi	07/10/2024	Business Analysis	Worked with Irene and Chris on Variance Report.	0.30	\$755.00	\$226.50
Jennifer Ganzi	07/11/2024	Committee Member/Professional Meetings & Communications	Weekly meeting between Dundon Team, Orrick (UCC Counsel), and Committee Members	0.50	\$755.00	\$377.50
<b>Totals for Jennifer Ganzi</b>				<b>6.10</b>		<b>\$4,605.50</b>

Timekeeper	Date	Category	Description	Time	Rate	Fee
Joshua Nahas	07/03/2024	Business Analysis	Review lease rejection motion	0.50	\$850.00	\$425.00

Joshua Nahas	07/08/2024	Business Analysis	Call with M Franke on APA amendment/ DIP notice	0.50	\$850.00	\$425.00
Joshua Nahas	07/08/2024	Business Analysis	Review APA amendment/ DIP notice redline of APA	1.30	\$850.00	\$1,105.00
Joshua Nahas	07/08/2024	Business Analysis	Review and analyze TSA and wind down budget	1.20	\$850.00	\$1,020.00
Joshua Nahas	07/08/2024	Business Analysis	Review and anal3 4 weeks of variance repeats to compare performance and review docket settlement to confirm on track with cash in budget	1.50	\$850.00	\$1,275.00
Joshua Nahas	07/08/2024	Committee Member/Professional Meetings & Communications	Call with Weil and M Franke on APA amendment	0.50	\$850.00	\$425.00
Joshua Nahas	07/12/2024	Business Analysis	Review wind down and trust budget	0.50	\$850.00	\$425.00
Joshua Nahas	07/12/2024	Business Analysis	Draft memo summarizing position on trust funding and wind down expenses	1.00	\$850.00	\$850.00
Joshua Nahas	07/12/2024	Committee Member/Professional Meetings & Communications	Call with PPP on wind down and trust budget	0.40	\$850.00	\$340.00
Joshua Nahas	07/12/2024	Committee Member/Professional Meetings & Communications	Calls with M Franke on wind down and trust budget (.3) (.4)	0.70	\$850.00	\$595.00
Joshua Nahas	07/14/2024	Business Analysis	Review liquidating trust budget and compare to likely op expenses to prepare for Weil call	1.00	\$850.00	\$850.00
Joshua Nahas	07/14/2024	Committee Member/Professional Meetings & Communications	Call wit M Franke and Weil	0.40	\$850.00	\$340.00
Joshua Nahas	07/16/2024	Committee Member/Professional Meetings & Communications	Call with M Franke on trust, expenses, causes of action	0.40	\$850.00	\$340.00
Joshua Nahas	07/17/2024	Business Analysis	Review 7/5 and 7/12 DIP variance reports	1.00	\$850.00	\$850.00
Joshua Nahas	07/17/2024	Business Analysis	Review presentation for UCC based on 7/5 and 7/12 variance reports	1.00	\$850.00	\$850.00
Joshua Nahas	07/18/2024	Business Analysis	Review plan term sheet	0.50	\$850.00	\$425.00

Timekeeper	Date	Category	Description	Time	Rate	Fee
------------	------	----------	-------------	------	------	-----

Joshua Nahas	07/18/2024	Committee Member/Professional Meetings & Communications	Call with Orrick to discuss Plan Term Sheet	0.40	\$850.00	\$340.00
Joshua Nahas	07/21/2024	Retention and Fee Applications	Review fee application and time entries	1.20	\$850.00	\$1,020.00
Joshua Nahas	07/25/2024	Business Analysis	Review Plan and DS	1.50	\$850.00	\$1,275.00
Joshua Nahas	07/26/2024	Business Analysis	Calls with M Franke to discuss post effective liquidating trust	0.60	\$850.00	\$510.00
Joshua Nahas	07/29/2024	Business Analysis	Review Redline Plan/DS and provide comments to counsel	1.00	\$850.00	\$850.00
<b>Totals For Joshua Nahas</b>				<b>17.10</b>		<b>\$14,535.00</b>
Matthew Dundon	07/14/2024	Retention and Fee Applications	Discussion of retention and fee matters with UCC counsel.	0.40	\$960.00	\$384.00
Matthew Dundon	07/18/2024	Exit and Post-Effective Date Planning	Discussion with UCC counsel and colleagues regarding post-effective date trust arrangements.	0.70	\$960.00	\$672.00
Matthew Dundon	07/18/2024	Retention and Fee Applications	Revision of retention order.	0.30	\$960.00	\$288.00
Matthew Dundon	07/26/2024	Exit and Post-Effective Date Planning	Continued with UCC counsel and colleagues regarding post-effective date trust arrangements.	0.50	\$960.00	\$480.00
<b>Totals For Matthew Dundon</b>				<b>1.90</b>		<b>\$1,824.00</b>
<b>Grand Total For July 2024</b>				<b>64.00</b>		<b>\$37,886.50</b>

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

	)	
In re:	)	Chapter 11
	)	
Liquidating Supply, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 24-11054 (BLS)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Obj. Deadline: Sept. 5, 2024 at 4:00 p.m. (ET)</b>
	)	<b>Hearing Date: <i>Only if objections are filed</i></b>

---

**NOTICE OF SECOND MONTHLY FEE APPLICATION OF DUNDON ADVISERS, LLC, CO-FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM JULY 1, 2024 THROUGH JULY 31, 2024**

---

**PLEASE TAKE NOTICE** that, on August 22, 2024 the Official Committee of Unsecured Creditors (the “Committee”) filed the *Second Monthly Fee Application for Dundon Advisers, LLC, Co-Financial Advisor to the Official Committee of Unsecured Creditors for Allowance of Compensation and Reimbursement of Expenses for the Period from July 1, 2024 through July 31, 2024* (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application must be in writing, filed with the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon undersigned counsel for the Committee, so that it is received **on or before 4:00 p.m. (ET) on September 5, 2024** (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that objections to the Application, if any, must be served upon and received by the following Application Recipients: (i) counsel to the Debtors, Potter Anderson & Corroon LLP, 1313 North Market Street, 6th Floor, Wilmington, Delaware 19801 (Attn: M. Blake Cleary (bcleary@potteranderson.com), R. Stephen McNeill (rmcneill@potteranderson.com), and Katelin A. Morales (kmorales@potteranderson.com)); (ii) Office of the United States Trustee, J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 (Attn: Benjamin A. Hackman (benjamin.a.hackman@usdoj.gov) and Malcolm M. Bates (malcolm.m.bates@usdoj.gov)); (iii) counsel for the DIP Lender and the Prepetition Secured Parties, (a) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Ray C. Schrock, Esq. (ray.schrock@weil.com) and Kevin Bostel, Esq. (kevin.bostel@weil.com)) and (b) Richards, Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, Delaware 19801

---

<sup>1</sup> The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: Liquidating Supply, Inc. (f/k/a Supply Source Enterprises, Inc.) (0842); SSE Intermediate, Inc. (1772); SSE Buyer, Inc. (5901); Liquidating Impact, LLC (f/k/a Impact Products, LLC) (7450); and Liquidating SZ, LLC (f/k/a The Safety Zone, LLC) (4597). The Debtors’ headquarters are located at 2840 Centennial Drive, Toledo, Ohio 43617.

(Attn: Zachary I. Shapiro, Esq. (shapiro@rlf.com) and Daniel J. DeFranceschi (defranceschi@rlf.com)); and (iv) counsel to the Committee, (a) Klehr Harrison Harvey & Branzburg LLP, 919 North Market Street, Suite 1000, Wilmington, Delaware 19801 (Attn: Domenic E. Pacitti (dpacitti@klehr.com), Richard M. Beck (rbeck@klehr.com) and Sally E. Veghte (sveghte@klehr.com)) and (b) Orrick, Herrington & Sutcliffe LLP, 51 West 52nd Street, New York, New York 10019 (Attn: Raniero D'Aversa (rdaversa@orrick.com), Xiang Wang (xiangwang@orrick.com), Mark Franke (mfranke@orrick.com), and Brandon Batzel (bbatzel@orrick.com)) (collectively, the "Notice Parties").

**PLEASE TAKE FURTHER NOTICE THAT PURSUANT TO THE ORDER (I) ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS AND (II) GRANTING RELATED RELIEF [DOCKET NO. 124], IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURE, THE DEBTORS WILL BE AUTHORIZED TO PAY 80% OF THE REQUESTED FEES AND 100% OF THE REQUESTED EXPENSES WITHOUT FURTHER ORDER OF THE COURT.**

Dated: August 22, 2024  
Wilmington, Delaware

/s/ Domenic E. Pacitti

Domenic E. Pacitti (DE Bar No. 3989)

Richard M. Beck (DE Bar No. 3370)

Sally E. Veghte (DE Bar No. 4762)

**KLEHR HARRISON HARVEY BRANZBURG LLP**

919 Market Street, Suite 1000

Wilmington, Delaware, 19801-3062

Telephone: (302) 426-1189

Email: dpacitti@klehr.com

rbeck@klehr.com

sveghte@klehr.com

-and-

Raniero D'Aversa (admitted *pro hac vice*)

Xiang Wang (admitted *pro hac vice*)

Mark Franke (admitted *pro hac vice*)

Brandon Batzel (admitted *pro hac vice*)

**ORRICK, HERRINGTON & SUTCLIFFE LLP**

51 West 52nd Street

New York, New York 10019-6142

Telephone: (212) 506-5000

Email: rdaversa@orrick.com

xiangwang@orrick.com

mfranke@orrick.com

bbatzel@orrick.com

*Co-Counsel to the Official Committee of Unsecured Creditors*