

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

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

**THIRD MONTHLY FEE APPLICATION OF ORRICK, HERRINGTON & SUTCLIFFE
LLP, COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

Name of Applicant:	Orrick, Herrington & Sutcliffe LLP
Authorized to provide professional services to:	The Official Committee of Unsecured Creditors
Date of retention:	July 22, 2024, effective as of June 5, 2024
Period for which compensation and reimbursement is sought:	August 1, 2024 through August 31, 2024
Amount of compensation sought as actual, reasonable and necessary:	\$27,790.40 (80% of \$34,738.00)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00
This is a:	Third Monthly Application

¹ 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:

		Requested		Approved		
Date Filed	Period Covered	Fees	Expenses	Fees [80%]	Expenses [100%]	Fee Holdback
First Monthly Filed 7/26/2024 Docket No. 264	6/5/2024- 6/30/2024	\$463,457.20 ²	\$2,218.54	\$370,765.76 ³	\$2,218.54	\$92,691.44 ⁴
Second Monthly Filed 8/22/2024 Docket No. 316	7/1/2024- 7/31/2024	\$133,512.40	\$1,873.54	\$106,809.92	\$1,873.54	\$26,702.48

² In the *First Monthly Fee Application of Orrick, Herrington & Sutcliffe LLP, Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation and Reimbursement of Expenses for the Period from June 5, 2024 through June 30, 2024* [Docket No. 264] (the "First Monthly Fee Application"), the Applicant originally requested fees for the period covered in the amount of \$470,403.60. Following informal comments from the U.S. Trustee to the First Monthly Fee Application, the Applicant agreed to a voluntary reduction of fees in the amount of \$6,946.40. Such reduction is reflected in the above prior applications chart and will be reflected in an order approving the Applicant's Interim or Final Fee Application (as defined in the Interim Compensation Order), as applicable.

³ Reflects 80% of the total fees billed less the agreed upon reduction in response to the U.S. Trustee's comments to the First Monthly Fee Application.

⁴ Reflects 20% of the total fees billed less the agreed upon reduction in response to the U.S. Trustee's comments to the First Monthly Fee Application.

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

Name of Professional Person	Date of Bar Admission	Position with the Applicant and Number of Years in that Position	Hourly Billing Rate⁵	Total Billed Hours	Total Compensation
Mark Franke	2/26/14 (NY)	Counsel (Restructuring) (since 2023)	\$1,068.00	8.50	\$9,078.00
Brandon Batzel	6/27/16 (NY)	Senior Associate (Restructuring) (since 2023)	\$1,024.00	19.00	\$19,456.00
Nicholas Sabatino	12/13/19 (CA)	Managing Associate (Restructuring) (since 2023)	\$940.00	6.60	\$6,204.00
TOTAL (Discount Applied)				34.10	\$34,738.00

⁵ Rates reflect 20% discount off Orrick's global hourly rates.

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

PROJECT CATEGORY	TOTAL HOURS	TOTAL FEES
Committee Meetings & Communications	1.60	\$1,660.40
Exclusivity, Plan & Disclosure Statement	23.50	\$23,773.60
Professional Retention & Fees – Orrick	9.00	\$9,304.00
TOTAL	34.10	\$34,738.00

LIQUIDATING SUPPLY, INC. *ET AL.*
EXPENSE SUMMARY
AUGUST 1, 2024 THROUGH AUGUST 31, 2024

Expense Category	Service Provider (if applicable)	Total Expenses
N/A		\$0.00
TOTAL		\$0.00

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

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In re:)	Chapter 11
)	
Liquidating Supply, Inc., <i>et al.</i> , ¹)	Case No. 24-11054 (BLS)
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Debtors.)	(Jointly Administered)
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)	Objection Deadline: Oct. 4, 2024 at 4:00 p.m. ET
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**THIRD MONTHLY FEE APPLICATION OF ORRICK, HERRINGTON & SUTCLIFFE
LLP, COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD FROM AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

Orrick Herrington & Sutcliffe, LLP (the “Applicant” or “Orrick”), as counsel 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”),² for allowance of

¹ 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.

² 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 August 1, 2024 through August 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. Orrick's Retention

7. On June 26, 2024, the Committee filed an application [Docket No. 189] with the Court for an order authorizing it to retain and employ Orrick as its counsel, effective as of June 5, 2024. On July 22, 2024, the Court entered an order [Docket No. 244] 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, Orrick is seeking compensation in the amount of \$27,790.40, which is equal to eighty percent (80%) of \$34,738.00 in fees for professional services rendered by Orrick during the Application Period. This amount is derived solely from the applicable hourly billing rates of Orrick personnel, applying the applicable discount, who rendered services to the Committee. Orrick did not incur any expenses during the Application Period.

Professional Services Rendered

11. Attached hereto as Exhibit A is a detailed itemization, by project category, of all services performed by Orrick 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 in categories, and all meetings or hearings are individually identified.

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

Expense Reimbursement

13. Orrick did not incur any out-of-pocket expenses during the Application Period.

Valuation of Services

14. Attorneys of Orrick have expended a total of 34.10 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 Orrick's global hourly rates of compensation for work of this character with a discount of 20% applied. The reasonable value of the services rendered Orrick for the Application Period as counsel for the Committee in these Chapter 11 Cases is \$34,738.00.

16. Orrick believes that the time entries included in Exhibit A comply 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 Orrick 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, Orrick believes that such deviations are not material and respectfully requests that any such requirements be waived.

[Remainder of page intentionally left blank]

WHEREFORE, Orrick respectfully requests (a) allowance of compensation for professional services rendered to the Committee during the Application Period in the amount of \$27,790.40 (80% of \$34,738.00), (b) payment by the Debtors of the foregoing amount; and (c) such other and further relief as the Court deems just and proper.

Dated: September 20, 2024
Wilmington, Delaware

/s/ Raniero D'Aversa

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

Xiang Wang (admitted *pro hac vice*)

Nicholas A. Poli (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

npoli@orrick.com

mfranke@orrick.com

bbatzel@orrick.com

Counsel to the Official Committee of Unsecured Creditors

Exhibit A

Time Detail



Official Committee of Unsecured Creditors of
Supply Source Enterprises

Attn: Leo Liao

September 20, 2024
Client No. 56045
Invoice No. 2213293

Orrick Contact: Mark Franke

FOR SERVICES RENDERED through August 31, 2024 in connection
with the matters described on the attached pages:

LESS CLIENT DISCOUNT

SUBTOTAL

DISBURSEMENTS as per attached pages:

TOTAL CURRENT FEES & DISBURSEMENTS (Pay this Amount):

\$	43,422.50
	<u>(8,684.50)</u>
\$	34,738.00
	0.00
\$	<u><u>34,738.00</u></u>

Matter(s): 56045/2001 – Official Committee of Supply Source Enterprises

DUE UPON RECEIPT

The following is for information only:

Previous Balance not included in this invoice:

\$119,393.92

If this amount has already been paid, please disregard.

In order to ensure proper credit to your account,
please reference your **INVOICE** and **CLIENT** numbers on your remittance.
For inquiries, call: (304) 231-2704. Fax (304) 231-2501.

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

REMITTANCE ADDRESS:

*Orrick, Herrington & Sutcliffe LLP
P.O. Box 848066
Los Angeles, CA 90084-8066
Reference: 56045/ Invoice: 2213293*

ELECTRONIC FUNDS

TRANSFERS:

ACH & Wire Transfers:

ABA Number 121000248

SWIFT CODE: WFBIUS6S

Account Number: 4123701088

*Wells Fargo
420 Montgomery Street
San Francisco, CA 94104
Account of
Orrick, Herrington & Sutcliffe LLP
Reference: 56045/ Invoice: 2213293
E.I.N. 94-2952627*

OVERNIGHT DELIVERY:

*Lockbox Services (848066)
Orrick, Herrington & Sutcliffe LLP
3440 Flair Drive
El Monte, CA 91731
Reference: 56045/ Invoice:
2213293*

To pay online visit www.e-billexpress.com/ebpp/Orrick/



Official Committee of Unsecured Creditors of
Supply Source Enterprises

Attn: Leo Liao

September 20, 2024
Client No. 56045
Invoice No. 2213293

Orrick Contact: Mark Franke

For Legal Services Rendered Through August 31, 2024 in Connection With:

Matter: 2001 - Official Committee of Supply Source Enterprises

PHASE OCUC1 – OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF SUPPLY SOURCE ENTERPRISES

Task OCUC09 – Committee Meetings & Communications

Date	Names	Description of services rendered	Hours	Amount
08/01/24	M. Franke	Attend meeting and send update email to committee.	0.50	534.00
08/08/24	B. Batzel	Attend weekly standing meeting with Committee.	0.40	409.60
08/14/24	B. Batzel	Send email status update to the Committee in lieu of weekly meeting.	0.40	409.60
08/29/24	B. Batzel	Prepare and circulate status update to Committee in lieu of weekly meeting.	0.30	307.20
<i>OCUC09 – Committee Meetings & Communications Total</i>			<i>1.60</i>	<i>1,660.40</i>

Task OCUC13 – Exclusivity, Plan & Disclosure Statement

Date	Names	Description of services rendered	Hours	Amount
08/02/24	N. Sabatino	Review draft plan of reorganization (2.0); draft liquidation trust agreement to conform to draft plan (1.2).	3.20	3,008.00
08/02/24	M. Franke	Draft liquidation trust agreement.	1.00	1,068.00
08/03/24	N. Sabatino	Draft liquidation trust agreement to conform to plan.	3.40	3,196.00
08/07/24	B. Batzel	Review revised draft of plan and disclosure statement.	1.90	1,945.60
08/07/24	M. Franke	Review and comment on revised draft of plan (1.5); review draft liquidation trust agreement (1.5).	3.00	3,204.00
08/08/24	M. Franke	Review liquidation trust agreement.	0.40	427.20
08/15/24	M. Franke	Review and revise liquidation trust agreement.	1.60	1,708.80
08/23/24	B. Batzel	Draft liquidation trust agreement.	1.70	1,740.80



Official Committee of Unsecured Creditors of Supply Source Enterprises -
56045
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September 20, 2024
Invoice No. 2213293

08/26/24	B. Batzel	Review and comment on draft liquidation trust agreement (6.2); review revised draft of combined plan and disclosure statement (0.6).	6.80	6,963.20
08/27/24	B. Batzel	Email with Potter team regarding revised combined plan and disclosure statement.	0.50	512.00
<i>OCUC13 – Exclusivity, Plan & Disclosure Statement Total</i>			<i>23.50</i>	<i>23,773.60</i>

Task OCUC19 – Professional Retention & Fees – Orrick

Date	Names	Description of services rendered	Hours	Amount
08/08/24	M. Franke	Review comments from US Trustee regarding fee application.	0.50	534.00
08/09/24	M. Franke	Review comments further from US Trustee regarding fee application.	0.50	534.00
08/12/24	M. Franke	Begin to prepare second monthly fee application.	1.00	1,068.00
08/21/24	B. Batzel	Prepare second monthly fee application.	7.00	7,168.00
<i>OCUC19 – Professional Retention & Fees – Orrick Total</i>			<i>9.00</i>	<i>9,304.00</i>

PHASE OCUC1 – OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF SUPPLY SOURCE ENTERPRISES TOTAL

Total Hours	34.10	
Total For Services		\$34,738.00

Task Code	Description	Hours	Billed Amount
PHASE OCUC1 – OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF SUPPLY SOURCE ENTERPRISES			
OCUC09	Committee Meetings & Communications	1.60	1,660.40
OCUC13	Exclusivity, Plan & Disclosure Statement	23.50	23,773.60
OCUC19	Professional Retention & Fees – Orrick	9.00	9,304.00
PHASE OCUC1 – OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF SUPPLY SOURCE ENTERPRISES TOTALS		34.10	34,738.00
Totals		34.10	\$34,738.00



Official Committee of Unsecured Creditors of Supply Source Enterprises -
56045
page 3

September 20, 2024
Invoice No. 2213293

<u>Timekeeper Summary</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brandon Batzel	19.00	1,024.00	19,456.00
Mark Franke	8.50	1,068.00	9,078.00
Nick Sabatino	6.60	940.00	6,204.00
Total All Timekeepers	34.10	\$1,018.71	\$34,738.00
Total For This Matter			\$34,738.00

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

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

**NOTICE OF THIRD MONTHLY FEE APPLICATION OF ORRICK, HERRINGTON &
SUTCLIFFE LLP, COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD FROM AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

PLEASE TAKE NOTICE that, on September 20, 2024, the Official Committee of Unsecured Creditors (the “Committee”) filed the *Third Monthly Fee Application of Orrick, Herrington, & Sutcliffe LLP, Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation and Reimbursement of Expenses for the Period from August 1, 2024 through August 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 October 4, 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, DE 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

¹ 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@clehr.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)).

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: September 20, 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*)

Nicholas A. Poli (admitted *pro hac vice*)

Mark Franke (admitted *pro hac vice*)

Brandon Batzel (admitted *pro hac vice*)

ORRICK, HERRINGTON & SUTCLIFFE LLP

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Counsel to the Official Committee of Unsecured Creditors