IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	Chapter 11
AMPLE, INC., *et al.*,[1]	Case No. 25-90817 (CML)
Debtors.	(Jointly Administered)

SUMMARY COVER SHEET TO FIRST INTERIM FEE APPLICATION OF PORZIO, BROMBERG & NEWMAN, P.C. AS ATTORNEYS FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF AMPLE, INC., *ET AL.* FOR THE PERIOD OF JANUARY 6, 2026 TO MARCH 31, 2026

Name of Applicant:	Porzio, Bromberg & Newman, P.C.	
Applicant's Role in Case:	Attorneys for the Official Committee of Unsecured Creditors	
Docket No. of Employment Order(s):	Docket No. 178 (02/18/2026)	
1st Interim Application	Indicate whether this is an interim or final Application. If interim, indicate the number (1st, 2nd, 3rd, etc.)	
	Beginning Date	**End Date**
Time period covered by this Application for which interim compensation has not previously been awarded:	01/06/2026	03/31/2026
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? (Y)		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Y)		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Y)		
Do expense reimbursements represent actual and necessary expenses incurred? (Y)		
Compensation Breakdown for Time Period Covered by this Application		
Total professional fees requested in this Application:		$133,494.00
Total professional hours covered by this Application:		180.1
Average hourly rate for professionals:		$741.22
Total paraprofessional fees requested in this Application:		$12,801.00
Total paraprofessional hours covered by this Application:		36.4

[1] The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are: Ample, Inc. (4015) and Ample Texas EV, LLC (6832). A copy of this Monthly Fee Statement is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Debtors' claims and noticing agent, Verita Global at https://veritaglobal.net/ample.

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Average hourly rate for paraprofessionals:	$351.68
Total fees requested in this Application:	$146,295.00
Total expense reimbursements requested in this Application:	$0.00
Total fees and expenses requested in this Application:	$146,295.00
Total fees and expenses awarded in all prior Applications:	N/A
Plan Status: No Plan has been filed or confirmed yet.	
Primary Benefits: Porzio, on behalf of the Committee, has taken the following actions to benefit the estate: (i) monitor the Debtors' operations and use of cash to ensure preservation of estate value and protection of unsecured creditor interests; (ii) analyze the liens on the Debtors' assets; (iii) analyze the potential avoidance actions; (iv) analyze the Debtors' actions prior to commencement of these chapter 11 cases, including intercompany transactions and insider transactions, and other potential litigation recoveries; (v) coordination with the Debtors and DIP Lender regarding asset disposition and asset recovery; (vi) participate in global mediation to ensure maximization of value for unsecured creditors. This work has substantially benefited the Debtors' estate for the benefit of all interested parties.	

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	Chapter 11
AMPLE, INC., *et al.*[1],	Case No. 25-90817 (CML)
Debtors.	(Jointly Administered)

FIRST INTERIM FEE APPLICATION OF PORZIO, BROMBERG & NEWMAN, P.C. AS ATTORNEYS FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF AMPLE, INC., *ET AL.*, FOR THE PERIOD OF JANUARY 6, 2026 TO MARCH 31, 2026

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Porzio, Bromberg & Newman, P.C. ("Porzio" or "Applicant"), Attorneys for the Official Committee of Unsecured Creditors (the "Committee"), hereby submits its first interim application ("Application") for allowance of compensation for professional services provided in the amount of **$146,295.00** and for reimbursement of actual and necessary expenses in the amount of **$0.00** for the period commencing January 6, 2026 to March 31, 2026 ("Application Period"). In support of this Application, Porzio respectfully states as follows:

[1] The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are: Ample, Inc. (4015) and Ample Texas EV, LLC (6832). A copy of this Interim Fee Application is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Debtors' claims and noticing agent, Verita Global at https://veritaglobal.net/ample.

I. JURISDICTION

1. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The bases for relief requested herein are sections 330 and 331 of Title 11 of the United States Code (the "Bankruptcy Code"), Bankruptcy Rule 2016, and Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "Bankruptcy Local Rules").

II. BACKGROUND

3. On December 16, 2025 (the "Petition Date"), the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in this Court. *See* ECF No. 1. On December 18, 2025, the Court ordered joint-administration of the Debtors' respective cases, thereby creating these chapter 11 cases (the "Chapter 11 Cases"). *See* ECF No. 23.

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

5. On December 30, 2025, pursuant to section 1102 of the Bankruptcy Code, the Office of the United States Trustee for Region 7 (the "U.S. Trustee") appointed the Committee, consisting of the following members: (i) Qindao Huari Hardware Product Co., Ltd; (ii) Avalon Technologies Limited; (iii) MingChing Industrial; and, (iv) Sabrina Ohanian. *See* ECF No. 53.

6. On January 6, 2026 (the "Retention Date"), the Committee, in connection with the exercise of its powers and the performance of the duties conferred upon it pursuant to section 1103 of the Bankruptcy Code, selected Porzio to serve as its counsel in connection with these Chapter 11 Cases, subject to Court approval.

7. On February 18, 2026, the Court entered the *Order Approving Procedures for the Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No. 178] (the "Interim Compensation Order").

8. On February 2, 2026, the Committee filed an application to employ Porzio as Attorneys for the Official Committee of Unsecured Creditors [ECF No. 150] (the "Application to Employ").

9. On February 24, 2026 the Court entered the *Order Authorizing the Employment and Retention of Porzio, Bromberg & Newman, P.C. as Attorneys for the Official Committee of Unsecured Creditors effective as of January 6, 2026* [ECF No. 192] (the "Retention Order").

10. The terms and conditions of Porzio's employment and compensation are set forth in the Application to Employ, as modified by the Retention Order. Porzio has no agreement of any kind, express or implied, to divide with any person or entity any portion of the compensation sought or to be received by it in these Chapter 11 Cases.

11. Porzio has submitted to the relevant parties monthly fee statements (collectively, the "Fee Statements") consisting of a brief statement as to the fees and costs incurred in approximately one-month periods, including the associated detailed time entries, pursuant to the procedures set forth in the Interim Compensation Order.

12. By this Application, Porzio seeks approval of fees in the amount of **$146,295.00** and expenses in the amount of **$0.00** for the Application Period. During the Application Period, Porzio attorneys and paraprofessionals rendered **216.5** hours of services in the course of representing the Committee, at a blended rate of **$675.73** per hour.

III. ITEMIZATION OF SERVICES PROVIDED BY PORZIO

13. In support of this Application, attached are the following exhibits:

- **Exhibit 1** is the First Monthly Fee Statement of Porzio, Bromberg & Newman, P.C., for Compensation for Services and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for Period from January 6, 2026 to January 31, 2026 [Docket No. 202].
- **Exhibit 2** is the Second Monthly Fee Statement of Porzio, Bromberg & Newman, P.C., for Compensation for Services and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for Period from February 1, 2026 to February 28, 2026 [Docket No. 213].
- **Exhibit 3** is the Third Monthly Fee Statement of Porzio, Bromberg & Newman, P.C., for Compensation for Services and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for Period from March 1, 2026 to March 31, 2026 [Docket No. 237].

14. A summary of the amounts to be paid to Porzio in accordance with the Interim Compensation Order for Monthly Fee Statements relating to the Application Period are set forth as follows.

Docket Number	Filing Date	Compensation Period	Requested Fees	Requested Expenses	Hold Back Amounts	Fees Paid	Expenses Paid	Amount Due
202	02/27/2026	January 6, 2026 to January 31, 2026	$20,043.50	$0	$4,008.70	$16,034.80	$0	$4,008.70
213	3/16/2026	February 1, 2026 to February 28, 2026	$69,425.00	$0	$13,885.00	$55,540.00	$0	$13,885.00
237	4/10/2026[1]	March 1, 2026 to March 31, 2026	$56,826.50	$0	$11,365.30	$0	$0	$56,826.50
Grand Total			**$146,295.00**	**$0**	**$29,259.00**	**$71,574.80**	**$0**	**$74,720.20**

15. Pursuant to this Application and the Interim Compensation Order, Porzio now seeks payment of the amounts outstanding, including the twenty percent (20%) "hold-back" amounts, in connection with its previously delivered Monthly Fee Statements.

[1] The objection deadline on account of Porzio's March Fee Statement was April 24, 2026.

16. Although every effort has been made to include all fees and expenses incurred during the Application Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Application Period. Porzio reserves the right to make further application to the Court for allowance of such fees and expenses not included herein. Subsequent fee applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the Procedures and the Interim Compensation Order.

IV. SUMMARY OF SERVICES PROVIDED

17. During the Application Period, Porzio provided complex and intricate services to the Committee, including:

a. **Assumption and Rejection of Leases and Contracts (3.10 hours).** Among other things, Porzio reviewed the lease rejection motion and monitored the docket; reviewed court notices and orders regarding the rejection of equipment leases and executory contracts; assessed potential claims related to lease rejection.

b. **Asset Analysis and Recovery (33.90 hours).** Among other things, Porzio; reviewed the Debtors' balance sheet and related footnotes; scheduled and attended meetings with the Committee's financial advisor to discuss the case and avenues of recovery; communicated with the Debtor team regarding duty drawback process; compiled a due diligence request list; reviewed D&O insurance information and assessed potentially available assets for unsecured creditors; conducted research regarding insider transactions and intercompany transactions, including review of the petition, first day declaration, schedules, statement of financial affairs, and cash management motion, and drafted and revised related memoranda; and prepared and served a Notice of Rule 2004 subpoena and related exhibits.

c. **Asset Disposition (37.60 hours).** Among other things, Porzio reviewed the Bid Procedures motion and analyzed the proposed order; participated in calls with the Getzler Henrich team to discuss the general status of the case and the sale process; reviewed and prioritized the data room index; conferred with the DIP lender and auctioneer; reviewed incoming bids and conferred with the Debtors, DIP lender, and team regarding same; participated in conference calls with Gordian Group regarding the sale process and next steps; conferred regarding post-bid strategy and next steps; and followed up regarding duty drawback and asset disposition matters.

d. **Business Operations (8.00 hours).** Among other things, Porzio reviewed and redlined the first day orders; prepared for and attended hearings on first day motions; prepared compliance spreadsheets, tracked and cross-checked relevant deadlines, and calendared compliance deadlines; and attended meetings with the financial advisors regarding the Debtors' business operation and asset sales.

e. **Case Administration (11.00 hours).** Among other things, Porzio reviewed notices of appearance and pro hac vice motions; compiled summaries of first day filings highlighting operative orders, case posture, and next-step action items; monitored the docket for recent filings; managed file organization and administrative tasks; generated a to-do list for the case and oversaw various moving parts in retention and general administration; reviewed the docket and filed pleadings, and calendared deadlines; and prepared the service and distribution list.

f. **Claims Administration and Objections (5.60 hours).** Among other things, Porzio reviewed and redlined the bar date motion and order; reviewed communications with the Committee and checked the claims register for filed proofs of claim of Committee members; and conferred with Committee members regarding WARN Act issues and claims.

g. **Fee/Employment Applications (42.20 hours).** Among other things, Porzio conducted interviews for the Committee's financial advisor; reviewed information to determine disclosures required for Porzio's retention application; prepared Porzio's retention application and financial advisor's retention application; reviewed the Debtors' counsel, financial advisor, and investment banker retention applications and drafted summaries of fee structures; prepared monthly fee statements; assessed IB fee structure in light of sale structure and go-forward paths.

h. **Meetings and Communications with Creditors (20.90 hours).** Among other things, Porzio participated in meetings with the Committee and prepared meeting summaries and agendas; prepared and circulated bylaws for review by the Committee; worked through any issues requiring Committee votes, such as related to the sale process.

i. **Plan and Disclosure Statement (42.30 hours).** Among other things, Porzio conferred with Dundon regarding the Plan and next steps and prepared a draft Plan of Liquidation, Disclosure Statement, and Liquidating Trust Agreement with the consent of the Debtors and DIP Lender.

j. **Financing (11.00 hours).** Among other things, Porzio reviewed and considered the terms of the DIP, including the DIP milestones and provided substantive commentary; reviewed and implemented changes to the DIP order through discussions / negotiations with the Debtors and DIP Lender; participated in calls with the Debtors' and DIP Lender's professionals

regarding the DIP; review and analyzed the budget; attended related hearings; and reviewed DIP reporting and analysis updates.

k. **Relief from Stay Proceedings (0.90 hours).** Porzio reviewed and provided comments to stay relief motion.

V. REQUEST FOR INTERIM ALLOWANCE OF FEES AND EXPENSES

18. Section 330 of the Bankruptcy Code authorizes the Court to award professional persons employed pursuant to section 327 reasonable compensation for actual and necessary services rendered and reimbursement for actual and necessary expenses incurred. *See* 11 U.S.C. §§ 327 and 330. As more fully stated below, Porzio submits that the elements governing awards of compensation pursuant to sections 330 and 331 of the Bankruptcy Code justify the allowance of the fees and expenses incurred in its representation of the Committee during the Application Period.

19. In 1974, the Fifth Circuit established a set of guidelines for use by lower courts when ruling on attorneys' fee requests. *See Johnson v. Ga. Highway Express, Inc*., 488 F.2d 714, 717-19 (5th Cir. 1974). The *Johnson* court found the following factors necessary to consider:

a. the time and labor required;
b. the novelty and difficulty of the questions presented;
c. the skill requisite to perform the legal services properly;
d. the preclusion of other employment due to the acceptance of the case;
e. the customary fee;
f. whether the fee is fixed or contingent;
g. time limitations imposed by the client with the circumstances of the case;
h. the amount involved and the results obtained;
i. the experience, reputation and ability of the attorney;
j. the undesirability of the case;
k. the nature and length of the professional relationship with the client; and
l. awards in similar cases.

Id.

20. In *In re First Colonial Corporation of America*, 544 F.2d 1291, 1298-99 (5th Cir. 1977), cert. denied, 431 U.S. 904 (1977), the Fifth Circuit applied the *Johnson* factors to the analysis of fee awards in bankruptcy cases.

21. As analyzed below, Porzio believes that the elements governing awards of compensation justify the allowance prayed for herein.

A. Time and Labor Required

22. As more specifically described in the Application, at total of 216.5 hours of professional services were rendered by Porzio on behalf of the Committee during the Application Period. Porzio respectfully submits that its time spent performing services for the Committee was reasonable.

23. Porzio's representation of the Committee has required it to balance the need to provide quality services with the need to act quickly and to represent the Committee in an effective, efficient, and timely manner. Porzio submits that the hours spent were reasonable given the size and complexity of these Chapter 11 Cases, the significant (and often times urgent) issues raised, and the numerous pleadings filed in these cases. All of the services performed were performed in good faith and necessary to assist the Committee in fulfilling its duties through these Chapter 11 Cases in an expeditious and efficient manner.

B. Novelty and Difficulty of Questions Presented

24. These Chapter 11 Cases involve a significant number of novel issues, especially regarding tariff and tax refunds, duty drawback, intellectual property, and industry specific issues. During these Chapter 11 Cases, Porzio provided assistance to the Committee and worked closely with the Debtors and DIP Lender on each of these issues, among others, in order to assist the Debtors with working toward a recovery for unsecured creditors and a successful sale process.

C. Skill Requisite to Perform the Legal Services Properly

25. Due to the nature and complexity of the legal issues presented in these cases, a high degree of legal skill related to bankruptcy law and other issues was required by Porzio in representing the Committee. These skills exceeded those of the average practitioner because they included, among others, finance, restructuring, and litigation skills. Porzio believes that its attorneys have been used effectively and efficiently to meet the requirements of the tasks assigned, and have benefited the Debtors, their estates, and parties in interest during the Application Period, as discussed above.

D. Preclusion of Other Employment

26. Although Porzio's representation of the Committee often involved matters that were time-critical and required substantial efforts, Porzio's representation of the Committee did not materially preclude Porzio from accepting other engagements. However, when working on these Chapter 11 Cases at any given time, Porzio's professionals and paraprofessionals necessarily could not be working on other matters.

E. Customary Fee

27. The rates charged by Porzio in these Chapter 11 Cases are similar to the rates charged by Porzio in other Chapter 11 Cases previously and currently pending before bankruptcy courts in this and other districts.

F. Whether the Fee is Fixed or Contingent

28. The fees requested in this Application represent fees incurred based upon a fixed hourly rate basis. As is true for counsel in every bankruptcy case, Porzio's compensation is contingent upon the Court's final allowance of all requested fees.

G. Time Limitations

29. Porzio provided capable legal representation in good faith and in the best interests of the Committee within the time limitations imposed under the unique circumstances of these Chapter 11 Cases, the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, and counsel for various parties in interest. During these Chapter 11 Cases, there were numerous instances in which it was necessary for Porzio to deliver services on very short notice and under significant time constraints.

H. Amounts Involved and Results Obtained

30. Porzio has requested a total amount of $146,295.00 for this Application. Porzio has played an active and constructive role in advancing these cases. In particular, Committee counsel has helped facilitate meaningful progress on the Debtors' duty drawback efforts, working with the Debtors and their advisors to identify, evaluate, and pursue potential recoveries. In addition, Committee counsel has conducted investigations into potential claims against insiders and other parties, including analyzing relevant transactions and assessing potential causes of action for the benefit of the estate. Committee counsel has also been actively involved in the disposition of estate assets, engaging with the Debtors, their advisors, and key stakeholders to help maximize value through the sale process and ensure that asset recoveries are optimized for the benefit of creditors. Committee counsel was ultimately instrumental in a global deal that allowed for the sale process to proceed.

I. Experience, Reputation and Ability of Counsel

31. As demonstrated in the Application to Employ, each of Porzio's attorneys who performed services possesses a reputation for skill, quality, integrity, and ability. Porzio's attorneys have represented numerous debtors, banks, creditors, bidders for estate assets, trustees,

and official committees in some of the largest and most sophisticated bankruptcy cases in the country.

J. Undesirability of the Cases

32. These chapter 11 cases are not undesirable

K. Nature and Length of the Professional Relationship

33. Porzio has represented the Committee since its formation, and that relationship continues to date.

L. Awards in Similar Cases

34. The fees and expenses for which Porzio seeks compensation and reimbursement are not excessive and are substantially similar to or below the rates awarded in similar cases in this district for similar services rendered and results obtained.

VI. SECTION 504(B) COMPLIANCE

35. No agreement or understanding exists between Porzio and any third person for the sharing of compensation, except as allowed by section 504(b) and Bankruptcy Rule 2016 with respect to sharing of compensation between and amongst shareholders at Porzio.

36. All services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Committee and not on behalf of any other entity.

VII. NOTICE

37. Notice of this Application will be provided to the following parties: (a) the Debtors; (b) counsel to the Debtors; (c) the Office of the United States Trustee for the Southern District of Texas; (d) counsel to the DIP Lender; (e) counsel to all Secured Creditors, if any; and (f) all parties receiving ECF notice.

VIII. CONCLUSION

38. Porzio respectfully requests that the Court enter an order, in substantially the same form attached hereto: (a) approving fees in the amount of $146,295.00 and reimbursement of expenses in the amount of $0.00 for the Application Period; (b) directing payment of the unpaid portion of the compensation for services rendered and the reimbursement of expenses incurred by Porzio during the Application Period; and (c) granting such other and further relief, both at law and in equity, as this Court deems just and proper.

Dated: April 30, 2026

Respectfully submitted,

PORZIO, BROMBERG & NEWMAN, P.C.

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Counsel to Official Committee of Unsecured Creditors.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	Chapter 11
AMPLE, INC., *et al.*,[1]	Case No. 25-90817 (CML)
Debtors.	(Jointly Administered)

ORDER APPROVING THE FIRST INTERIM FEE APPLICATION OF PORZIO, BROMBERG & NEWMAN, P.C. FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF AMPLE, INC., *ET AL.* FOR THE PERIOD OF JANUARY 6, 2026 TO MARCH 31, 2026

Upon consideration of the *First Interim Application of Porzio, Bromberg & Newman, P.C. as Attorneys for the Official Committee of Unsecured Creditors of Ample Inc. et. Al. for Allowance of Compensation and Reimbursement of Expenses for the Period of January 6, 2026 to March 31, 2026* (the "Application"),[2] filed by Porzio, Bromberg & Newman, P.C. ("Porzio"); and it appearing that this Court has jurisdiction to consider the Application pursuant to 28 U.S.C. § 1334; and it appearing that the venue of these chapter 11 cases and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and, after due deliberation, the Court having determined that the relief requested in the Application is in the best interests of the Debtors, their estates, their creditors, and all other parties in interest; and the Court having determined that the services rendered by Porzio were reasonable and necessary, were performed in good faith and in the best interest of the Committee, the Debtors, the estates, and parties in interest; and the Court having determined that Porzio's request for compensation and reimbursement of expenses is

[1] The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are: Ample, Inc. (4015) and Ample Texas EV, LLC (6832).

[2] Any capitalized terms used but not defined in this Order shall have the meaning ascribed to them in the Application.

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reasonable, justified and proper; and it appearing that proper and adequate notice of the Application has been given and that no other or further notice is necessary; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Application is **GRANTED** as set forth herein.

2. Porzio is allowed interim compensation in the amount of $146,295.00 and reimbursement of expenses in the amount of $0.00 for the period January 6, 2026 through and including March 31, 2026, for a total mount of $146,295.00.

3. The Debtors are authorized to disburse any unpaid amounts allowed by Paragraph 2 of this Order.

4. The Court shall retain jurisdiction with respect to all matters related to the interpretation and implementation of this Order.

Signed: _____, 2026

HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY COURT

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