Docket #1188 Date Filed: 05/08/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Saga Formations, Inc., *et al.*,[1]	Case No. 24-11161 (BLS)
Debtors.	(Jointly Administered)
	Re: D.I. 1167, 1168, 1169, 1170, 1171, 1172 & 1173

CERTIFICATE OF COUNSEL REGARDING
PROPOSED OMNIBUS ORDER GRANTING FINAL
ALLOWANCE OF FEES AND EXPENSES FOR CERTAIN PROFESSIONALS

The undersigned counsel to Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the "Trustee") of Saga Formations, Inc. ("Saga"), Pajeau, Inc. ("Pajeau"), and Tangible Play, Inc. ("Tangible Play," together with Saga and Pajeau, collectively the "Debtors") hereby certifies as follows:

1. On April 16, 2026, the following fee applications (collectively, the "Fee Applications") were filed in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [D.I. 218] (the "Interim Compensation Order").[2]

a. *Eighteenth Monthly (for the Period March 1, 2026 through March 31, 2026) and Final Application of Jenner & Block LLP as Co-Counsel to the Chapter 11 Trustee, for Allowance of Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period September 23, 2024, through and Including March 31, 2026* (D.I. 1167, the "Jenner Fee Application");

b. *Sixteenth Monthy (for the Period March 1, 2026 through March 31, 2026) and Final Application of Novo Advisors LLC as Accountants and Financial*

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758); and Tangible Play, Inc. (9331).

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Interim Compensation Order.

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Advisors to the Chapter 11 Trustee, for Allowance of Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period September 23, 2024. Through and Including march 31, 2026 (D.I. 1168, the "Novo Fee Application");

c. *Eighteenth Monthly (for the Period March 1, 2026 through March 31, 2026) and Final Application of Pashman Stein Walder Hayden, P.C. as Counsel to the Chapter 11 Trustee, for Allowance of Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period September 23, 2024, Through and Including March 31, 2026* (D.I. 1169, the "Pashman Fee Application");

d. *Tenth Monthly (for the Period March 1, 2026 through March 31, 2026) and Final Application of the Law Offices of Panag & Babu as Indian Local Counsel to the Chapter 11 Trustee, for Allowance of Monthly Compensation and for Monthly Reimbursement of All Actual and Necessary Expenses Incurred for the Period October 14, 2024, Through and Including March 31, 2026* (D.I. 1170, the "Panag Fee Application");

e. *Sixth and Final Application of Quinn Emanual Urquhart & Sullivan, LLP* (D.I. 1171, "Quinn Fee Application");

f. *Final Fee Application of FTI Consulting, Inc. as Investigative and Financial Advisors to the Chapter 11 Trustee, for Allowance of Final Compensation Incurred for the Period from October 15, 2024 through March 31, 2026* (D.I. 1172, "FTI Fee Application"); and

g. *Final Fee Application of Kurtzman Carson Consultants, LLC dba Verita Global, as Administrative Advisor to the Chapter 11 Trustee, for the Period from September 23, 2024 Through and Including March 31, 2026* (D.I. 1173, filed "Verita Fee Application").

2. Objections to the Fee Applications were to be filed no later than May 7, 2026 at 4:00 p.m. (ET).

3. Attached hereto as **Exhibit A** is the Proposed Omnibus Order Granting Final Allowance of Fees and Expenses for Certain Professionals (the "Proposed Order").

4. Each of the Professionals and the United States Trustee for the District of Delaware (the "U.S. Trustee") were provided with an opportunity to review the Proposed Order and do not object to its entry.

5. While the U.S. Trustee had informal comments, it does not object to entry of the Proposed Order.

WHEREFORE, the Trustee respectfully requests that the Court enter the Proposed Order substantially in the form attached hereto as **Exhibit A** at the earliest convenience of the Court.

Dated: May 8, 2026
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

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Exhibit A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Saga Formations, Inc., *et al.*,[1]	Case No. 24-11161 (BLS)
Debtors.	(Jointly Administered)
	Re: D.I. 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1185, 1186 & 1187

OMNIBUS ORDER GRANTING FINAL
ALLOWANCE OF FEES AND EXPENSES FOR CERTAIN PROFESSIONALS

These matters come to be heard, in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [D.I. 218] (the "Interim Compensation Order"),[2] on the Final Fee Applications filed by the Professionals identified on **Exhibit A** hereto for the periods set forth on such exhibit; and this Court having determined that proper and adequate notice of these matters has been given and that no other or further notice is necessary; and the requested compensation for the services detailed in the applicable Final Fee Applications being for reasonable and necessary services rendered by the applicable Professionals; the reimbursements for expenses detailed in the Final Fee Applications representing actuals and necessary expenses incurred by the applicable Professionals in connection with these cases; the legal and factual bases set forth in the Final Fee Applications having established just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor;

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758); and Tangible Play, Inc. (9331).

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Interim Compensation Order.

IT IS HEREBY ORDERED;

1. Final compensation and reimbursement of expenses for the Professionals are hereby allowed as set forth in this Order, including **Exhibit A** attached hereto.

2. The Trustee is authorized and directed to promptly disburse to each Professional payment in the amount equal to the difference between (a) one hundred percent (100%) of the total fees and expenses allowed herein for such Professional as set forth in Column (6) on **Exhibit A** attached hereto and (b) any previous payments already made to such Professional.

3. The Trustee is authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order.

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

5. This Order shall be effective immediately upon entry.

Exhibit A

(1)	(2)	(3)	(4)	(5)	(6)
Applicant	**Final Period**	**Total Fees Requested for the Final Period**	**Total Expenses Requested for the Final Period**	**Voluntary Reductions**	**Total Amount Authorized for the Final Period**
FTI Consulting, Inc. [D.I. 1172]	10/15/2024-03/31/2026	$617,409.50	$10,893.17	$0.00	$628,302.67
Jenner & Block LLP [D.I. 1167 and D.I. 1185]	09/23/2024-03/31/2026	$11,298,051.50	1,077,974.83	$0.00	$12,376,026.33
Kurtzman Carson Consultants, LLC dba Verita Global [D.I. 1173]	09/23/2024-03/31/2026	$37,124.07	$0.00	$0.00	$37,124.07
The Law Offices of Panag & Babu [D.I. 1170]	10/14/2024-03/31/2026	$972,255.60	$101,141.46	$0.00	$1,073,397.06
Novo Advisors LLC [D.I 1168 and D.I. 1186]	09/23/2024-03/31/2026	$4,027,353.00	$37,603.09	$0.00	$4,064,956.09
Pashman Stein Walder Hayden, P.C. [D.I. 1169 and D.I. 1187]	09/23/2024-03/31/2026	$2,155,788.00	$17,736.67	$0.00	$2,173,524.67
Quinn Emanuel Urquhart & Sullivan LLP [D.I. 1171]	09/23/2024-03/31/2026	$150,703.65	$82.09	$0.00	$150,785.74
Totals for Interim Requested	09/23/2024-03/31/2026	**$19,258,685.32**	**$1,245,431.31**	**$0.00**	**$20,504,116.63**