UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
www.flmb.uscourts.gov

IN RE:	Chapter 11 Cases
TRAJECTOR HOLDINGS, LLC, [1]	Case No. 3:26-bk-03286-JAB Lead Case
	Jointly Administered with
BENEFITS GROUP HOLDINGS, LLC,	Case No. 3:26-bk-03289-JAB
TRAJECTOR MEDICAL, LLC,	Case No. 3:26-bk-03291-JAB
INFINITE IP LLC,	Case No. 3:26-bk-03293-JAB
PERFECT PATH, LLC,	Case No. 3:26-bk-03295-JAB
TRAJECTOR ADMIN SERVICES, LLC,	Case No. 3:26-bk-03296-JAB
BENEFITS INSURANCE, LLC,	Case No. 3:26-bk-03297-JAB
MYLER INSURANCE SERVICES HOLDINGS, LLC,	Case No. 3:26-bk-03298-JAB
ANCHORSIX SERVICES, LLC,	Case No. 3:26-bk-03299-JAB
ATVANTAGE, LLC,	Case No. 3:26-bk-03300-JAB
TRAJECTOR MEDIA SERVICES, LLC,	Case No. 3:26-bk-03301-JAB
GLOBALTEK BPO LLC,	Case No. 3:26-bk-03302-JAB
MYLER DISABILITY HOLDINGS, LLC,	Case No. 3:26-bk-03304-JAB
MYLER DISABILITY, LLC,	Case No. 3:26-bk-03306-JAB
ADDUCO MEDIA, LLC,	Case No. 3:26-bk-03307-JAB
TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-03308-JAB
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-03309-JAB
BENEFITS KARMA, LLC,	Case No. 3:26-bk-03310-JAB
EXECUTIVE STAFFING SOLUTIONS, PLLC,	Case No. 3:26-bk-03311-JAB
AMPRY HOLDINGS, LLC,	Case No. 3:26-bk-03312-JAB
CONCIERGE STAFFING SERVICE MANAGEMENT, LLC,	Case No. 3:26-bk-03314-JAB
TRAJECTOR, INC.,	Case No. 3:26-bk-03315-JAB
Debtors.	

[1] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

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DEBTORS' MOTION FOR ORDER ESTABLISHING PROCEDURES FOR MONTHLY AND INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR PROFESSIONALS

The above-captioned debtors and debtors in possession (collectively, the "Debtors"), by and through their proposed undersigned counsel, pursuant to 11 U.S.C. §§ 105(a) and 331, and Local Rule 2016-1(c)(2)(B), file this *Debtors' Motion for Order Establishing Procedures for Monthly and Interim Compensation and Reimbursement of Expenses for Professionals* (the "Motion") seeking the establishment of procedures for monthly and interim compensation of chapter 11 professionals. In support of this Motion, the Debtors rely upon the *Declaration of Mark C. Healy in Support of Chapter 11 Petitions and First Day Relief* (the "First Day Declaration") [Doc. No. 39], which was filed on the Petition Date (as defined below), and is incorporated herein by reference, and represent as follows:

Jurisdiction and Venue

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are sections 105(a) and 331 of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), and rule 2016-1(c)(2)(B) of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida.

Background

4. On July 23, 2026 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11

Cases").

5. The Debtors are operating their businesses and managing their affairs as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. For a detailed description of the Debtors and their operations, the Debtors respectfully refer the Court and parties in interest to the First Day Declaration.

Relief Requested and Basis Therefor

7. The Debtors request the Court to enter an order, substantially in the form attached hereto as **Exhibit A** establishing a procedure for compensating and reimbursing chapter 11 professionals employed by the Debtors and any statutory committee of creditors (if appointed) in these cases on a monthly basis, comparable to those established in complex chapter 11 cases in this and other districts. In this way, the Court and parties-in-interest can more effectively monitor the fees incurred by professionals, and the Debtors will be able to spread out their payments of professional fees, rather than suffer larger depletions to their cash flows on an irregular basis.

8. In connection with these Chapter 11 Cases and at this juncture, the Debtors have filed applications to retain (i) Berger Singerman LLP, as Debtors' general bankruptcy counsel; (ii) Carlton Fields, P.A., as Debtors' special litigation, corporate, and regulatory counsel; and (iii) Richards, Layton & Finger, P.A., as Debtors' special Delaware corporate counsel.[2] The filing of additional retention applications or motions may become necessary including, but not limited to, motions seeking authority to employ professionals utilized by the Debtors in the ordinary course of business ("OCPs"). The implementation of compensation procedures will

[2] The Debtors have also filed applications to retain (i) Mark C. Healy as Chief Restructuring Officer and other personnel at Michael Moecker & Associates, Inc., pursuant to 11 U.S.C. § 363(b), to provide financial advisory services to the Debtors, and (ii) Kurtzman Carson Consultants, LLC dba Verita Global, as the claims, noticing, and solicitation agent. These professionals should not be subject to the regular hold-back requirements based on the nature of their respective engagements with the Debtors.

provide a streamlined and otherwise efficient method for compensating professionals and as stated, such procedures will allow the Court and parties in interest to monitor fees sought by and paid to such professionals.

9. In summary, except as otherwise provided by Court order, the requested monthly compensation procedures would require all professionals retained with Court approval (the "Professionals") to represent to the Debtors and the official committee of unsecured creditors (the "Committee"), if appointed, and provide a detailed statement of services rendered and expenses incurred for the prior month to Application Recipients (defined below). If no timely objection is asserted, the Debtors would promptly pay 80% of the amount of fees incurred for the month, with a 20% holdback, and 100% of out-of-pocket expenses for the month. These payments would be subject to the Court's subsequent approval as part of the normal interim fee application process (approximately every 120 days), except as otherwise provided by Court orders as pertains to Court approved OCPs.

10. The Debtors propose that the monthly payment of compensation and reimbursement of expenses of the Professionals be structured as follows (such procedures, the "Monthly Compensation Procedures"):

a. On or before the 10th day of each month following the month for which compensation is sought, each Professional will serve a statement by mail or electronic transmission upon the (i) Debtors, Trajector Holdings, LLC, *et al.*, 5950 NW 1st Place, Suite 200, Gainesville, FL 32607 (Attn.: Damon Thayer, Esq., General Counsel, Damon.Thayer@trajector.com) and Trajector Holdings, LLC, *et al.*, c/o Michael Moecker & Associates, Inc., 841 Prudential Drive, Jacksonville, FL 32207 (Attn.: Mark C. Healy, Chief Restructuring Officer, mhealy@moecker.com); (ii) proposed counsel to the Debtors, Berger Singerman LLP, 101 E. Kennedy Boulevard, Suite 1165, Tampa, FL 33602 (Attn.: Edward J. Peterson, Esq., epeterson@bergersingerman.com) and Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131 (Attn.: Jordi Guso, Esq., jguso@bergersingerman.com and Clay B. Roberts, Esq., croberts@bergersingerman.com); (iii) counsel for pre-petition secured

administrative agent, Deutsche Bank AG New York Branch, White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020 (Attn.: Andrew Zatz, Esq., azatz@whitecase.com), White & Case LLP, 300 N. LaSalle Drive, Chicago, IL 60654 (Attn.: Clint Simkins, Esq., clint.simkins@whitecase.com), White & Case LLP, 200 South Biscayne Boulevard, Suite 4900, Miami, FL 33131 (Attn.: Kristin Schultz, Esq., Kristin.schultz@whitecase.com), and Smith Hulsey & Busey, One Independent Drive, Suite 3300, Jacksonville, FL 32202 (Attn.: John R. Thomas, Esq., jthomas@smithhulsey.com); (iv) Office of the United States Trustee, George C. Young Federal Building, 400 West Washington Street, Suite 1100, Orlando, FL 32801 (Attn.: Scott E. Bomkamp, Esq., scott.e.bomkamp@usdoj.gov and William J. Simonitsch, Esq., william.j.simonitsch@usdoj.gov); and (v) attorneys for the Committee, if any (collectively, the "Application Recipients"). The first statement to be issued by the Professionals will cover the period from the Petition Date through August 31, 2026. Thereafter, each Professional shall serve a monthly statement.

b. The statement need not be filed with the Court and a courtesy copy need not be delivered to the presiding judge's chambers since this Order is not intended to alter the fee application requirements outlined in §§ 330 and 331 of the Code, and since Professionals are still required to serve and file interim and final applications for approval of fees and expenses in accordance with the relevant provisions of the Code, the Bankruptcy Rules and the Local Rules for the United States Bankruptcy Court, Middle District of Florida.

c. Each fee statement must contain an abbreviated narrative of the services rendered, be accompanied by a printout or schedule of the reimbursable expenses incurred, and the professional and paraprofessional time spent (in sufficient detail to allow the review of this time by the Application Recipients) which, except as set forth above for the first statement, shall ordinarily be for services rendered through a particular calendar month.

d. Each Application Recipient receiving a statement may object to the payment of the fees or the reimbursement of costs set forth therein by serving a written objection (which shall not be filed with the Court) upon the other Application Recipients within fifteen (15) calendar days of receipt of the fee statement. The objection shall state the nature of the objection and identify the amount of fees or costs to which objection is made. The objecting party shall attempt in good faith to object only to the portion of the statement that is deemed to be objectionable.

e. In the absence of any timely objection, the Debtors are authorized to pay 80% of the fees and 100% of the expenses, except for fees or expenses as to which an objection may be served by one of the Application Recipients as provided below.

f. If the Debtors receive an objection to a particular fee statement, the Debtors shall withhold payment of that portion of the fee statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. All Professionals subject to this Order shall establish a separate billing number for any time spent on the resolution of fee disputes. Any fees incurred in connection with such fee disputes shall not be paid pursuant to the monthly statement but may only be sought and paid upon the filing of an interim fee application as set forth below and after order of the Court.

g. Similarly, if the parties to an objection are able to resolve their dispute following the service of an objection and if the party whose statement was objected to serves on all of the Application Recipients a statement indicating that the objection is withdrawn and describing in detail the terms of the resolution, then the Debtors are authorized to pay 80% of that portion of the fee statement which is no longer subject to an objection.

h. All objections that are not resolved by the parties shall be preserved and presented to the Court by the objecting party at the next hearing on an interim or final fee application.

i. The service of an objection shall not prejudice the objecting party's right to object to any fee application on any ground, whether or not raised in the objection. Furthermore, the decision by any party not to object to a fee statement shall not be a waiver of, nor otherwise prejudice, that party's right to object to any subsequent fee application.

j. Unless the Court orders otherwise, each of the Professionals utilizing the procedures described in this Order shall file interim fee applications, for the amount of fees and costs sought above, in accordance with the 120-day guideline set forth in Section 331 of the Bankruptcy Code as follows:

   i. First Interim Fee Applications may be filed on or before November 10, 2026 (the "First Interim Fee Applications"). The First Interim Fee Applications shall represent fees and costs incurred by the Professionals from the Petition Date through October 31, 2026; provided, however, if an order is entered by the Court with respect to confirmation of a proposed plan ("Plan Confirmation Procedures Order") where the time deadline(s) for filing fee applications differ from these Monthly Compensation Procedures, the time deadlines in the Plan Confirmation Procedures Order shall control.

   ii. Thereafter, interim fee applications may be filed in accordance with the schedule set forth above covering the preceding four-month time period. All interim fee applications shall comply with Local Rule 2016-1. The Court shall schedule and conduct a hearing upon proper notice in accordance with Bankruptcy Rule

2002(a)(6), to determine all interim fee applications pending before it.

k. A Professional who fails to file an application seeking approval of compensation and expenses previously paid pursuant to these Monthly Compensation Procedures when such application is due shall preclude such Professional from utilizing the automatic Monthly Compensation Procedures as provided herein until an interim fee application has been filed and heard by the Court.

l. A determination by the Court that payment of compensation or reimbursement of expenses was improper as to a particular statement shall not disqualify a Professional from the future payment of compensation or reimbursement of expenses as set forth above, unless otherwise ordered by the Court.

m. Neither the payment of, nor the failure to pay, in whole or in part, monthly compensation and reimbursement of expenses as provided herein shall have any effect on this Court's interim or final allowance of compensation and reimbursement of expenses of any Professionals.

11. The Debtors will include all payments made to Professionals as contemplated herein in their monthly operating reports, identifying the amount paid to each Professional.

12. The Monthly Compensation Procedures will enable all parties to closely monitor costs of administration in these Chapter 11 Cases and will enable the Debtors to maintain a more level cash flow availability and implement efficient cash management.

Authority for Relief

13. Pursuant to section 331 of the Bankruptcy Code, all professionals are entitled to submit applications for interim compensation and reimbursement of expenses every 120 days "or more often if the Court permits . . .." 11 U.S.C. § 331. Section 105(a) of the Bankruptcy Code provides, in part, that the Court "may issue any order, process or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a).

14. As set forth in Local Rule 2016-1(c)(2)(B), upon motion and after notice and hearing in chapter 11 cases, the Court may consider approval of procedures for monthly payment of interim fee applications for professionals based on the needs of the case.

15. Comparable procedures to those set forth herein have been adopted in other chapter 11 cases in this and other districts in the Eleventh Circuit. *See, e.g.*, *In re TP Brands Worldwide Inc., et al.*, Case No. 8:25-bk-08424-CED (Bankr. M.D. Fla. Feb. 6, 2026); *In re MBMG Holding, LLC*, Case No. 24-20576-CLC (Bankr. S.D. Fla. Nov. 7, 2024); *In re Red Lobster Management LLC, et al.,* Case No. 6:24-bk-02486-GER (Bankr. M.D. Fla. June 14, 2024); *In re Bird Global, Inc.*, Case No. 23-20514-CLC (Bankr. S.D. Fla. Jan. 29, 2024); *In re Persimmon Hollow Brewing Company, LLC,* Case No. 6:23-bk-04742-GER (Bankr. M.D. Fla. Dec. 13, 2023); *In re AeroTech Miami Inc. d/b/a iAero Tech, et al.,* Case No. 23-17503-RAM (Bankr. S.D. Fla. Oct. 16, 2023); *In re Surge Transportation, Inc.,* Case No. 3:23-bk-01712-JAB (Bankr. M.D. Fla. July 27, 2023); *In re Delphi Behavioral Health Group, LLC, et al.,* Case No. 23-10945-PDR (Bankr. S.D. Fla. Mar. 10, 2023); *In re Vital Pharmaceuticals, Inc., et al.,* Case No. 22-17842-PDR (Bankr. S.D. Fla. Nov. 22, 2022); *In re Tamarac 10200, LLC, et al.,* Case No. 20-23346-PDR (Bankr. S.D. Fla. Dec. 31, 2020); *In re American Purchasing Services, LLC, et al.*, Case No. 20-23495-SMG (Bankr. S.D. Fla. Dec. 16, 2020); *In re Toojay's Management LLC, et al.,* Case No. 20-14792-EPK (Bankr. S.D. Fla. July 21, 2020); *In re NRP Lease Holdings, LLC, et al.,* Case No. 3:19-bk-4607-JAF (Bankr. M.D. Fla. Dec. 19, 2019); *In re Palm Healthcare Co., Inc., et al.,* No. 19-19156-EPK (Bankr. S.D. Fla. Sept. 19, 2019); *In re Goodman and Dominguez, Inc., et al.*, Case No. 16-10056-RAM (Bankr. S.D. Fla. April 21, 2016); *In re HearUSA, Inc.*, No. 11-23341-BKC-EPK (Bankr. S.D. Fla. May 20, 2011); and *In re Gulfstream Intern. Group, Inc., et al.,* No. 10-44131-BKC-JKO (Bankr. S.D. Fla. Nov. 8, 2010).

Reservation of Debtors' Rights

16. If the Court grants the relief sought herein, any payment made pursuant to the Court's order is not intended and should not be construed as an admission as to the validity of any claim or a waiver of the Debtors' rights to dispute such claim subsequently.

WHEREFORE, the Debtors respectfully request the entry of an Order in the form attached hereto as **Exhibit A** (i) granting this Motion; (ii) authorizing the procedures for compensating and reimbursing Professionals as set forth herein; and (iii) granting the Debtors such other and further relief as the Court deems appropriate.

Dated: July 28, 2026

BERGER SINGERMAN LLP

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By: */s/ Edward J. Peterson*
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Proposed Counsel for the Debtors and Debtors-in-Possession

EXHIBIT A

(Proposed Order)

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
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[1] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-03308-JAB
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-03309-JAB
BENEFITS KARMA, LLC,	Case No. 3:26-bk-03310-JAB
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CONCIERGE STAFFING SERVICE MANAGEMENT, LLC,	Case No. 3:26-bk-03314-JAB
TRAJECTOR, INC.,	Case No. 3:26-bk-03315-JAB

Debtors.
_____/

ORDER GRANTING DEBTORS' MOTION FOR ORDER ESTABLISHING PROCEDURES FOR MONTHLY AND INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR PROFESSIONALS

THIS CASE came before the Court on _____, 2026 at _____ .m., in Jacksonville, Florida for hearing (the "Hearing") upon the *Debtors' Motion for Order Establishing Procedures for Monthly and Interim Compensation and Reimbursement of Expenses for Professionals* [Doc. No. ___] (the "Motion")[2] filed by the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"). The Motion seeks entry of an order establishing procedures for monthly and interim compensation and reimbursement of estate Professionals retained in these Chapter 11 Cases. The Court, having considered the Motion, finds that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; (c) this matter is core pursuant to 28 U.S.C. § 157(b)(2); (d) the Court may enter a final order consistent with Article III of the United States Constitution; (e) notice of the Motion and the Hearing thereon was sufficient under the circumstances and no other or further notice need be provided; (f) the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors and other parties in interest; and (g) upon a review of the record before the Court, including the legal and factual bases set forth in the Motion and the First Day Declaration and the statements made

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

by counsel at the Hearing, and being otherwise fully advised in the premises, does for the reasons stated on the record of the Hearing, all of which are incorporated herein; and after due deliberation and sufficient cause appearing therefor, has determined that good and sufficient cause exists to grant the relief requested. Accordingly, it is

ORDERED as follows:

1. The Motion is **GRANTED**.

2. Except as may otherwise be provided in Court orders authorizing the retention of specific professionals, all Professionals retained by the Debtors or the Debtors' estates, including any Official Committee of Unsecured Creditors, in these Chapter 11 Cases may seek monthly compensation in accordance with the following procedures:

a. On or before the 10th day of each month following the month for which compensation is sought, each Professional will serve a statement by mail or electronic transmission upon the (i) Debtors, Trajector Holdings, LLC, *et al.*, 5950 NW 1st Place, Suite 200, Gainesville, FL 32607 (Attn.: Damon Thayer, Esq., General Counsel, Damon.Thayer@trajector.com) and Trajector Holdings, LLC, *et al.*, c/o Michael Moecker & Associates, Inc., 841 Prudential Drive, Jacksonville, FL 32207 (Attn.: Mark C. Healy, Chief Restructuring Officer, mhealy@moecker.com); (ii) proposed counsel to the Debtors, Berger Singerman LLP, 101 E. Kennedy Boulevard, Suite 1165, Tampa, FL 33602 (Attn.: Edward J. Peterson, Esq., epeterson@bergersingerman.com) and Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131 (Attn.: Jordi Guso, Esq., jguso@bergersingerman.com and Clay B. Roberts, Esq., croberts@bergersingerman.com); (iii) counsel for pre-petition secured administrative agent, Deutsche Bank AG New York Branch, White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020 (Attn.: Andrew Zatz, Esq., azatz@whitecase.com), White & Case LLP, 300 N. LaSalle Drive, Chicago, IL 60654 (Attn.: Clint Simkins, Esq., clint.simkins@whitecase.com), White & Case LLP, 200 South Biscayne Boulevard, Suite 4900, Miami, FL 33131 (Attn.: Kristin Schultz, Esq., Kristin.schultz@whitecase.com), and Smith Hulsey & Busey, One Independent Drive, Suite 3300, Jacksonville, FL 32202 (Attn.: John R. Thomas, Esq., jthomas@smithhulsey.com); (iv) Office of the United States Trustee, George C. Young Federal Building, 400 West Washington Street, Suite 1100, Orlando, FL 32801 (Attn.: Scott E. Bomkamp, Esq., scott.e.bomkamp@usdoj.gov and William J. Simonitsch, Esq., william.j.simonitsch@usdoj.gov); and (v) attorneys for the Committee, if

any (collectively, the "Application Recipients"). The first statement to be issued by the Professionals will cover the period from the Petition Date through August 31, 2026. Thereafter, each Professional shall serve a monthly statement.

b. The statement need not be filed with the Court and a courtesy copy need not be delivered to the presiding judge's chambers since this Order is not intended to alter the fee application requirements outlined in §§ 330 and 331 of the Code, and since Professionals are still required to serve and file interim and final applications for approval of fees and expenses in accordance with the relevant provisions of the Code, the Bankruptcy Rules and the Local Rules for the United States Bankruptcy Court, Middle District of Florida.

c. Each fee statement must contain an abbreviated narrative of the services rendered, be accompanied by a printout or schedule of the reimbursable expenses incurred, and the professional and paraprofessional time spent (in sufficient detail to allow the review of this time by the Application Recipients) which, except as set forth above for the first statement, shall ordinarily be for services rendered through a particular calendar month.

d. Each Application Recipient receiving a statement may object to the payment of the fees or the reimbursement of costs set forth therein by serving a written objection (which shall not be filed with the Court) upon the other Application Recipients within fifteen (15) calendar days of receipt of the fee statement. The objection shall state the nature of the objection and identify the amount of fees or costs to which objection is made. The objecting party shall attempt in good faith to object only to the portion of the statement that is deemed to be objectionable.

e. In the absence of any timely objection, the Debtors are authorized to pay 80% of the fees and 100% of the expenses, except for fees or expenses as to which an objection may be served by one of the Application Recipients as provided below.

f. If the Debtors receive an objection to a particular fee statement, the Debtors shall withhold payment of that portion of the fee statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. All Professionals subject to this Order shall establish a separate billing number for any time spent on the resolution of fee disputes. Any fees incurred in connection with such fee disputes shall not be paid pursuant to the monthly statement but may only be sought and paid upon the filing of an interim fee application as set forth below and after order of the Court.

g. Similarly, if the parties to an objection are able to resolve their dispute following the service of an objection and if the party whose statement was

objected to serves on all of the Application Recipients a statement indicating that the objection is withdrawn and describing in detail the terms of the resolution, then the Debtors are authorized to pay 80% of that portion of the fee statement which is no longer subject to an objection.

h. All objections that are not resolved by the parties shall be preserved and presented to the Court by the objecting party at the next hearing on an interim or final fee application.

i. The service of an objection shall not prejudice the objecting party's right to object to any fee application on any ground, whether or not raised in the objection. Furthermore, the decision by any party not to object to a fee statement shall not be a waiver of, nor otherwise prejudice, that party's right to object to any subsequent fee application.

j. Unless the Court orders otherwise, each of the Professionals utilizing the procedures described in this Order shall file interim fee applications, for the amount of fees and costs sought above, in accordance with the 120-day guideline set forth in Section 331 of the Bankruptcy Code as follows:

i. First Interim Fee Applications may be filed on or before November 10, 2026 (the "First Interim Fee Applications"). The First Interim Fee Applications shall represent fees and costs incurred by the Professionals from the Petition Date through October 31, 2026; provided, however, if an order is entered by the Court with respect to confirmation of a proposed plan ("Plan Confirmation Procedures Order") where the time deadline(s) for filing fee applications differ from these Monthly Compensation Procedures, the time deadlines in the Plan Confirmation Procedures Order shall control.

ii. Thereafter, interim fee applications may be filed in accordance with the schedule set forth above covering the preceding four-month time period. All interim fee applications shall comply with Local Rule 2016-1. The Court shall schedule and conduct a hearing upon proper notice in accordance with Bankruptcy Rule 2002(a)(6), to determine all interim fee applications pending before it.

k. A Professional who fails to file an application seeking approval of compensation and expenses previously paid pursuant to these Monthly Compensation Procedures when such application is due shall preclude such Professional from utilizing the automatic Monthly Compensation Procedures as provided herein until an interim fee application has been filed and heard by the Court.

l. A determination by the Court that payment of compensation or reimbursement of expenses was improper as to a particular statement shall

not disqualify a Professional from the future payment of compensation or reimbursement of expenses as set forth above, unless otherwise ordered by the Court.

m. Neither the payment of, nor the failure to pay, in whole or in part, monthly compensation and reimbursement of expenses as provided herein shall have any effect on this Court's interim or final allowance of compensation and reimbursement of expenses of any Professionals.

3. The Debtors shall include all payments to Professionals on their monthly operating reports, detailed so as to state the amount paid to each of the Professionals.

4. The Debtors may not make any payments under this Order if the Debtors have not timely filed monthly operating reports or remained current with their administrative expenses and 28 U.S.C. § 1930(a)(6). Otherwise, this Order shall continue and shall remain in effect during the pendency of the Chapter 11 Cases unless otherwise ordered by the Court.

5. Neither (a) the payment of or the failure to pay, in whole or in part, monthly interim compensation and reimbursement of expenses under the Monthly Compensation Procedures nor (b) the filing of or failure to file an Objection with the Court, will bind any party in interest or the Court with respect to the final allowance of applications for compensation and reimbursements of expenses of Professionals. All fees and expenses paid to Professionals under the Monthly Compensation Procedures are subject to challenge and disgorgement until final allowance by the Court.

6. Notwithstanding anything to the contrary contained herein, any payment made or to be made, or authorization contained, hereunder shall be subject to the requirements imposed on the Debtors under any postpetition financing facility approved by, or any order regarding the use of cash collateral entered by, the Court in these Chapter 11 Cases.

7. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

8. Upon motion or application, and after due notice to all requisite parties in interest, additional professionals employed by the Debtors or Committee (if applicable) may be authorized to participate in the Monthly Compensation Procedures as set forth in this Order.

9. All Professionals subject to this Order shall be required to monitor their own compliance with the terms of this Order and shall include the following certification on each invoice: I hereby certify that I am in compliance with the terms of the *Order Granting Debtors' Motion for Order Establishing Procedures for Monthly and Interim Compensation and Reimbursement of Expenses for Professionals*.

10. The Debtors are authorized and empowered to take all reasonable actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

11. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

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(Attorney Edward J. Peterson is directed to serve a copy of this order on interested parties who do not receive service by CM/ECF and file a proof of service within three days of entry of the order.)