

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

In re:)	
)	Chapter 11
)	
PGX HOLDINGS, INC, <i>et al.</i> , ¹)	Case No. 23-10718 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Objection Deadline: August 21, 2025 at 4:00 p.m.
)	Hearing Date: September 11, 2025 at 3:00 p.m.

**THE PLAN ADMINISTRATOR’S MOTION FOR ENTRY OF
A FINAL DECREE CLOSING THE CHAPTER 11 CASES PURSUANT TO
SECTION 350(a) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3022**

The plan administrator (the “Plan Administrator”) of the confirmed plan of the above-captioned debtors (the “Debtors,” and after the Effective Date² of the Plan, the “Wind-Down Debtors”) respectfully state as follows in support of this motion:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012. The Plan Administrator confirms his consent, pursuant to Local Rule 9013 1(f), to the entry of a final order by the Court in connection with this motion to the extent that it is

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the *Second Amended Joint Plan of PGX Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 570].



later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

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

3. The statutory bases for the relief requested herein are section 350(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), Rule 3022 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 3022-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

BACKGROUND

1. On June 4, 2023 (the “Petition Date”), the Debtors filed with the Court voluntary petitions for relief under the Bankruptcy Code. During the pendency of their chapter 11 cases, the Debtors operated their business and managed their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On July 19, 2023, the Court entered an *Order (A) Establishing Bar Dates for Filing Proofs of Claim, Including Claims Under 11 U.S.C. § 503(B)(9) and Administrative Expense Requests; (B) Approving the Form and Manner for Filing Proofs of Claim and Administrative Expense Requests; (C) Approving Notice Thereof; and (D) Granting Related Relief* [Docket No. 194] (the “Bar Date Order”), establishing, among other things, September 7, 2023 as the deadline for all non-governmental entities to file Proofs of Claim.

3. On August 25, 2023, the Court entered orders [Docket No. 422 and 423] (together, the “Sale Orders”) approving (i) the Debtors’ entry into and performance under each of the Stalking Horse Agreements and authorizing the sale of substantially all of the Debtors’ assets free and clear of all liens, claims, interest, and encumbrances and (ii) the assumption by the Debtors and the assignment and sale to the Progrexion Purchaser or Lexington Law Purchaser (as

applicable, the “Purchaser”) of executory contracts and unexpired leases to be designated by the Purchaser as “Assumed Contracts” pursuant to the Sale Orders, the Progrexion APA, the Lexington Law APA, and sections 363 and 365 of the Bankruptcy Code, subject to, and effective as of, the closing of the Sale Transactions (the date of the closing being the “Closing Date”). The Closing Date occurred on September 28, 2023.

4. On December 26, 2023, the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving the Debtors’ Disclosure Statement for, and Confirming the Second Amended Joint Chapter 11 Plan of PGX Holdings, Inc., and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 681] (the “Confirmation Order”) that confirmed the *Second Amended Joint Plan of PGX Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 570] (the “Plan”). On December 26, 2023, the Effective Date of the Plan occurred.

5. The Plan designated Mark A. Roberts of Alvarez & Marsal North America, LLC as the Plan Administrator. Under the Plan, the Plan Administrator is authorized to administer claims on the Debtors’ behalf.

4. On June 6, 2023, the Court entered an order [Docket No. 56] appointing Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”) as the claims and noticing agent in these cases. Among other things, Verita is authorized to receive, maintain, docket, and otherwise administer the proofs of claim filed in these Case, and maintain the official claims register for the Debtor.

5. All claims, contested matters, adversary proceedings and other matters regarding the case have been fully resolved prior to the filing of this Motion. The Plan Administrator Debtor will file the final report as required by Local Rule 3022-1(c) at least fourteen (14) days prior to the

hearing on this Motion, substantially in the form attached hereto as **Exhibit B**. Accordingly, the only remaining tasks to be completed are to make the distributions in accordance with the Plan. In connection with closing the case, within 28 days of the entry of a final decree, Verita will: (a) forward to the Clerk an electronic version of all imaged claims, (b) upload the creditor mailing list into CM/ECF, and (c) docket a Final Claims Register. The services of Verita will terminate upon Verita completing the services set forth in the Final Decree.

RELIEF REQUESTED

6. By this motion, the Plan Administrator seeks entry of a final decree (the “Final Decree”) closing the chapter 11 cases. In connection with the entry of the Final Decree, the Plan Administrator requests the termination of Verita as claims agent upon the closing of the cases.

BASIS FOR RELIEF

7. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” Bankruptcy Rule 3022, which implements section 350 of the Bankruptcy Code, further provides “[a]fter an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.”

8. The term “fully administered” is not defined in the Bankruptcy Code, the Bankruptcy Rules, or the Local Rules. The Advisory Committee Note to Bankruptcy Rule 3022 (the “Advisory Committee Note”), however, sets forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

- a. whether the order confirming the plan has become final;
- b. whether deposits required by the plan have been distributed;
- c. whether the property proposed by the plan to be transferred has been transferred;

- d. whether the debtor or the successor of the debtor under the plan has assumed the business or the management of the property dealt with by the plan;
- e. whether payouts under the plan have commenced; and
- f. whether all motions, contested matters, and adversary proceedings have been finally resolved.

Fed. R. Bankr. P. 3022 Advisory Committee Note.

9. All of these factors need not be present before a court will enter a final decree. *Walnut Assocs. v. Saidel*, 164 B.R. 487, 493 (E.D. Pa. 1994) (“[A]ll of the factors in the Committee Note need not be present before the Court will enter a final decree.”). Courts in this district and others adopt the view that “these factors are but a guide in determining whether a case has been fully administered, and not all factors need to be present before the case is closed.” *In re SLI, Inc.*, 2005 WL 1668396, at *2 (Bankr. D. Del. June 24, 2005) (citing *In re Mold Makers, Inc.*, 124 B.R. 766, 768–69 (Bankr. N.D. Ill. 1990)); *see also In re Kliegl Bros. Universal Elec. Stage Lighting Co., Inc.*, 238 B.R. 531, 542 (Bankr. E.D.N.Y. 1999) (recognizing that bankruptcy courts weigh the factors contained in the Advisory Committee Note when deciding whether to close a case); *In re Jay Bee Enters., Inc.*, 207 B.R. 536, 538 (Bankr. E.D. Ky. 1997) (same).

10. Courts have also considered whether the plan of reorganization has been substantially consummated. *See, e.g., In re Gates Cmty. Chapel of Rochester, Inc.*, 212 B.R. 220, 224 (Bankr. W.D.N.Y. 1997) (considering substantial consummation as a factor in determining whether to close a case); *Walnut Assocs.*, 164 B.R. at 493 (same). Section 1101(2) of the Bankruptcy Code defines substantial consummation as follows:

- (A) transfer of all or substantially all of the property proposed by the plan to be transferred;
- (B) assumption by the debtor or by the successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and

(C) commencement of distribution under the plan.

11. U.S.C. § 1101(2).

11. The Plan Administrator believes that, as the facts set forth above indicate, all of the factors identified in the Advisory Committee Note and all of the elements of substantial consummation have been satisfied as of the filing of this Motion. Specifically, the Plan Administrator has filed objections to all claims needing resolution by this Court and retains the right to resolve further objections without this Court's supervision, all transfers of property under the Plan have been transferred, and all motions, contested matters, and adversary proceedings have been fully resolved. Finally, all distributions to creditors that have not yet been made will be made in accordance with the provisions of the Plan. Accordingly, the Plan has been substantially consummated in all respects.

12. In accordance with Local Rule 3022-1(c), on or before 14 days' prior to hearing on this Motion, the Plan Administrator will file a Final Report, substantially in the form attached hereto as **Exhibit B** describing: (a) the fees and expenses awarded to the retained Professionals who rendered services during the pendency of the Case; and (b) the distributions made (and to be made) under the Plan.

13. Section 1930(a)(6) of title 28 of the U.S. Code requires that quarterly fees be paid to the Office of the U.S. Trustee. The Plan Administrator will make any final payments due to the Office of the U.S. Trustee and the Clerk of the Court in connection with this motion. Based on the foregoing, ample justification exists for entry of the Final Decree closing these chapter 11 cases.

Termination of Verita

14. In addition to the foregoing, the Plan Administrator requests that contemporaneously with entry of a final order as to all of the Wind Down Debtor's cases, this

Court terminate the engagement of Verita, which was approved pursuant to the *Order Authorizing the Debtors to Employ and Retain Kurtzman Carson Consultants LLC as Claims and Noticing Agent, Effective as of the Petition Date* (D.I. 56). Upon termination, and except as otherwise provided herein, Verita shall have no further obligations to this Court, the Wind Down Debtors, or any party in interest with respect to Verita's engagement as the claims and noticing agent in the Cases.

15. Pursuant to Local Rule 2002-l(e)(ix), within 28 days of entry of the final Order granting this Motion, Verita shall (a) forward to the Clerk an electronic version of all imaged Claims; (b) upload the creditor mailing list into CM/ECF, and (c) docket a Final Claims Register.

16. Should Verita receive any mail regarding the Wind Down Debtor after entry of the final Order granting this Motion, Verita shall collect and forward such mail no less frequently than monthly to the Plan Administrator at the following address (or such other address as may be subsequently provided by the Plan Administrator to Verita): c/o Michael Yurkewicz, Klehr Harrison Harvey Branzburg, LLP, 919 N. Market St., Suite 1000, Wilmington, Delaware 19801.

RESERVATION OF RIGHTS

17. The Plan Administrator reserves his right to seek to reopen the chapter 11 cases.

NOTICE

18. The Plan Administrator will provide notice of this motion to the following parties or their respective counsel: (a) the U.S. Trustee for the District of Delaware (the "U.S. Trustee"); (b) those persons who have formally appeared or requested service in these cases pursuant to Bankruptcy Rule 2002; and (c) counsel to the Prepetition First Lien Lenders and DIP Lenders.

The Plan Administrator submits that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

19. No prior request for the relief sought in this motion has been made to this or any other court.

WHEREFORE, the Plan Administrator respectfully requests that the Court enter the Final Decree granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Dated: August 7, 2025
Wilmington, Delaware

/s/ Michael W. Yurkewicz

Michael W. Yurkewicz (DE Bar No. 4165)

KLEHR HARRISON HARVEY

BRANZBURG LLP

919 North Market Street, Suite 1000

Wilmington, Delaware 19801

Telephone: (302) 426-1189

Facsimile: (302) 426-9193

Email: myurkewicz@klehr.com

Counsel to the Plan Administrator

Exhibit A

Proposed Final Decree

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

In re:

PGX HOLDINGS, INC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-10718 (CTG)
)
) (Jointly Administered)
)
) **Related to Docket No.**
)

**FINAL DECREE CLOSING THE CHAPTER 11 CASES PURSUANT TO SECTION
350(a) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3022**

Upon the motion (the “Motion”)² of the Plan Administrator of the Plan of the above-captioned debtors (the “Debtors,” and after the Effective Date of the Plan, the “Wind-Down Debtors”) for entry of a final decree (this “Final Decree”) closing the chapter 11 cases of the Debtors pursuant to section 350(a) of the Bankruptcy Code and Bankruptcy Rule 3022, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Wind-Down Debtors' estates, their creditors, and other parties in interest; and this Court having found that the notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"), if any; and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing, if any, establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth in this Final Decree.
2. Pursuant to section 350(a) of the Bankruptcy Code and Rule 3022 of the Federal Rules of Bankruptcy Procedure, the Wind-Down Debtors' chapter 11 cases identified on Exhibit 1 hereto are hereby closed; *provided, however*, that this Court shall retain such jurisdiction as is provided in the Plan.
3. The Plan Administrator shall provide any remaining quarterly reports and pay any resulting fees due to the U.S. Trustee pursuant to 28 U.S.C. § 1930 within thirty (30) days of the entry of this Final Decree.
4. Entry of this final decree is without prejudice to the rights of the United States Trustee to reopen these Case to seek appropriate relief in the event of an unresolved dispute over the payment of fees pursuant to 28 U.S.C. § 1930(a)(6), if any, or the post-confirmation reports.
5. Upon completing the services set forth in this Order, Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), is terminated as claims and noticing agent in these chapter 11

cases, and shall have no further obligations to this Court, the Wind-Down Debtors, or any other party in interest, as claims and noticing agent in these chapter 11 cases.

6. Pursuant to Local Bankruptcy Rule 2002-1(e)(ix), within 28 days of entry of this Final Decree, Verita shall (a) forward to the Clerk's office an electronic version of all imaged claims, (b) upload the creditor matrix into CM/ECF, and (c) docket a final claims register containing the claims of all of these jointly-administered chapter 11 cases.

7. Verita will collect and forward any mail regarding these chapter 11 cases after entry of this Final Decree as soon as reasonably practicable to the Plan Administrator at the following address (or such other address as may be subsequently provided by the Plan Administrator to Verita): c/o Michael W. Yurkewicz, Klehr Harrison Harvey Branzburg LLP, 919 N. Market St., Suite 1000, Wilmington, DE 19801.

8. Verita shall be compensated for the above services in accordance with the terms of its Engagement Agreement.

9. The Clerk of this Court shall enter this Final Decree on the docket of the above-captioned chapter 11 cases and the docket of these chapter 11 cases shall be marked as "Closed."

10. An entry shall be made on the docket of each of the Wind-Down Debtors' cases that is substantially similar to the following:

An order has been entered in accordance with Rule 3022-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the District of Delaware closing the chapter 11 cases jointly administered under: *In re PGX Holdings, Inc, et al.*, 23-10718 (CTG).

11. Entry of this Final Decree is without prejudice to (a) the rights of the Plan Administrator or any party in interest to seek to reopen these chapter 11 cases for cause pursuant to section 350(b) of the Bankruptcy Code or the rights of the Plan Administrator to dispute, before

the Court or in an appropriate non-bankruptcy forum, all claims that were filed against the Debtors in the chapter 11 cases as contemplated by the Plan and the Confirmation Order.

12. The Plan Administrator and his agents are authorized to take all actions necessary to effectuate the relief granted in this Final Decree in accordance with the Motion.

13. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Final Decree.

Exhibit 1

Chapter 11 Cases to Be Closed

Chapter 11 Cases to Be Closed

Jointly Administered Cases	Other Names (Last 8 Years)	Case No.	Tax ID No.
PGX Holdings, Inc.		23-10718 (CTG)	45-4352510
Credit Repair UK, Inc.		23-10719 (CTG)	35-2474798
Credit.com, Inc.		23-10720 (CTG)	94-3341580
Creditrepair.com Holdings, Inc.		23-10721 (CTG)	45-4357536
Creditrepair.com, Inc.		23-10722 (CTG)	45-4357680
eFolks Holdings, Inc.		23-10723 (CTG)	27-2815213
eFolks, LLC		23-10724 (CTG)	27-2815256
John C. Heath, Attorney At Law PC	Lexington Law Firm	23-10725 (CTG)	34-2038362
Progrexion ASG, Inc.		23-10726 (CTG)	27-2815153
Progrexion Holdings, Inc.		23-10727 (CTG)	27-2827123
Progrexion IP, Inc.		23-10728 (CTG)	27-2815179
Progrexion Marketing, Inc.		23-10729 (CTG)	27-2815073
Progrexion Teleservices, Inc.		23-10730 (CTG)	27-2815110

Exhibit B

The Final Report

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

In re:

PGX HOLDINGS, INC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-10718 (CTG)
)
) (Jointly Administered)
)
) **Related to Docket No.**
)

THE FINAL REPORT IN CHAPTER 11 CASES

1. Pursuant to the December 26, 2023 *Findings of Fact, Conclusions of Law, and Order Approving the Debtors’ Disclosure Statement for, and Confirming the Second Amended Joint Chapter 11 Plan of PGX Holdings, Inc., and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 681] (the “Confirmation Order”) that confirmed the *Second Amended Joint Plan of PGX Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 570] (the “Plan”) of the above-captioned debtors (the “Debtors,” and after the Effective Date² of the Plan, the “Wind-Down Debtors”), the undersigned representative of the Plan Administrator declares that:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progexion ASG, Inc. (5153); Progexion Holdings, Inc. (7123); Progexion IP, Inc. (5179); Progexion Marketing, Inc. (5073); and Progexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the *Second Amended Joint Plan of PGX Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 570].

PAYMENTS TO PROFESSIONALS

2. The payments made by the Debtors to professionals for services rendered and fees and expenses incurred during the cases are set forth on the attached **Schedule 1**. These payments have been approved by order at Docket No. 819 and have been paid.

3. No trustee or examiner was appointed in these chapter 11 cases. Accordingly, no fees were incurred for a trustee or trustee's counsel.

DISTRIBUTIONS TO CREDITORS UNDER THE PLAN

4. All distributions required by the Plan to date have been made. The Plan Administrator anticipates further distributions being made after closure of these cases.

5. There are no pending adversary proceedings or contested matters in these chapter 11 cases.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this ___ day of ___, 2025.

Mark Roberts
Plan Administrator

Professional and Title	Final Application Request (Fees)	Final Application Request (Expenses)	Total Amount Requested	Total Amount Approved to Date by Interim Order	Total Amount Requested Not Yet Approved	Voluntary/ Agreed Reductions With US Trustee	Total Amount Requested After Reductions
DEBTORS' PROFESSIONALS							
Kirkland & Ellis LLP and Kirkland & Ellis International LLP - Lead Counsel to the Debtors							
Second Interim & Final Application 6/4/23-12/25/2023 Docket No. 767	\$5,997,769.00	\$93,328.65	\$6,091,097.65	\$4,434,642.75	\$1,656,454.90	\$40,000.00	\$6,051,097.65
Klehr Harrison Harvey Branzburg LLP - Co-Counsel to the Debtors							
Final Application 6/4/23-12/31/2023 Docket No. 768	\$954,590.50	\$16,657.40	\$971,247.90	\$507,783.58	\$463,464.32	\$1,146.50	\$970,101.40
Greenhill & Co., LLC - Financial Advisor and Investment Banker to Debtors							
Final Application 6/4/23-11/30/2023 Docket No. 744	\$4,074,625.00	\$3,825.96	\$4,078,450.96	\$403,309.75	\$3,675,141.21	NA	\$4,078,450.96
Alvarez & Marsal North America, LLC - Restructuring Advisor to the Debtors							
Final Application 6/5/23-12/29/2023 Docket No. 765	\$3,624,645.25	\$94,451.48	\$3,719,096.73	\$2,458,051.62	\$1,261,045.11	\$1,162.88	\$3,717,933.85
Landis Rath & Cobb LLP - Conflicts Counsel to the Debtors							
Second Monthly & Final Application 6/4/2023-12/31/2023 Docket No. 766	\$20,740.00	\$920.95	\$21,660.95	\$0.00	\$21,660.95	NA	\$21,660.95
Kurtzman Carson Consultants LLC - Administrative Advisor to the Debtors							
Final Application 6/4/2023-12/29/2023 Docket No. 769	\$8,712.55	\$0.00	\$8,712.55	\$0.00	\$8,712.55	NA	\$8,712.55
Williams & Connolly LLP - Special Counsel to the Debtors							
Final Application 6/4/2023-9/28/2023 Docket No. 773	\$1,273,259.00	\$98,616.43	\$1,375,875.43 ¹	\$0.00	\$1,375,875.43	Fees \$3,710.00 Expenses \$2,128.34	\$1,370,037.09
Holland & Hart LLP - Special Counsel to the Debtors							
Final Application 6/4/2023-12/29/2023 Docket No. 774	\$384,546.50	\$12,515.10	\$397,061.60	\$0.00	\$397,061.60	NA	\$397,061.60

¹ This amount includes \$4,000.00 of fees and expenses for finalizing final fee request.

Professional and Title	Final Application Request (Fees)	Final Application Request (Expenses)	Total Amount Requested	Total Amount Approved to Date by Interim Order	Total Amount Requested Not Yet Approved	Voluntary/ Agreed Reductions With US Trustee	Total Amount Requested After Reductions
Pachulski Stang Ziehl & Jones LLP - Conflicts Counsel for John C. Heath, Attorney at Law PC d/b/a Lexington Law Firm							
First and Final Application 6/4/2023-12/26/2023 Docket No. 702	\$169,643.50 ²	\$4,476.52	\$174,120.02	\$0.00	\$174,120.02	NA	\$174,120.02
COMMITTEE'S PROFESSIONALS							
ArentFox Schiff LLP - Lead Counsel to the Official Committee of Unsecured Creditors							
Final Application 6/16/23-12/25/2023 Docket No. 770	\$1,324,431.00	\$7,847.44	\$1,332,278.44	\$1,020,292.12	\$311,986.32	\$4,816.00	\$1,327,709.44 ³
Morris James LLP – Co-Counsel to the Official Committee of Unsecured Creditors							
Final Application 6/16/23-12/25/2023 Docket No. 771	\$332,735.00 ⁴	\$29,025.49 ⁵	\$361,760.49	\$285,032.91	\$76,727.58	NA	\$361,760.49
FTI Consulting, Inc. - Financial Advisor to the Official Committee of Unsecured Creditors							
Final Application 6/20/23-12/25/2023 Docket No. 772	\$661,345.75	\$690.15	\$662,035.90	\$565,710.40	\$96,325.50	NA	\$662,035.90 ⁶
GRAND TOTAL:	\$18,827,043.00	\$362,355.57	\$19,193,398.62	\$9,674,823.13	\$9,518,575.49	\$52,963.72	\$19,140,681.90

² This amount includes an additional \$5,000.00 for fees and costs estimated to be incurred in the preparation of final fee application and any related order and in preparing for and appearing at the hearing on this matter.

³ This amount includes an additional \$35,247.00 in estimated fees for the Post-Confirmation Date Period.

⁴ This amount includes an additional \$21,460.00 in estimated fees for the Post-Confirmation Date Period.

⁵ This amount includes an additional \$500.00 in estimated expenses for the Post-Confirmation Date Period.

⁶ This amount includes an additional \$11,914.00 in estimated fees for the Post-Confirmation Date Period.

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

In re:

PGX HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-10718 (CTG)
)
) (Jointly Administered)
)
) **Obj. Deadline: August 21, 2025 at 4:00 p.m. (ET)**
) **Hearing Date: September 11, 2025 at 3:00 p.m. (ET)**

**NOTICE OF THE PLAN ADMINISTRATOR’S MOTION FOR ENTRY OF
A FINAL DECREE CLOSING THE CHAPTER 11 CASES PURSUANT TO
SECTION 350(A) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3022**

PLEASE TAKE NOTICE THAT on August 7, 2025, the Plan Administrator (the “Plan Administrator”) of the above-captioned debtors (the “Debtors”), filed *The Plan Administrator’s Motion for Entry of a Final Decree Closing the Chapter 11 Cases Pursuant to Section 350(a) of the Bankruptcy Code and Bankruptcy Rule 3022* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (“Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that any responses to the Motion must be in writing and filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Third Floor, Wilmington, Delaware 19801, and served upon the following: (a) counsel for the Plan Administrator, Klehr Harrison Harvey Branzburg LLP, 919 N. Market Street, Suite 1000, Wilmington, DE 19801 (Attn: Domenic E. Pacitti

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

(dpacitti@klehr.com) and Michael W. Yurkewicz (myurkewicz@klehr.com)); (b) counsel for the Prepetition First Lien Lenders and DIP Lenders, (i) King & Spalding, 1185 Avenue of the Americas, New York, NY 10036 (Attn: Roger Schwartz, Esq. (rschwartz@kslaw.com)); Geoffrey Michael King, Esq. (gking@kslaw.com) and Timothy Fesenmyer, Esq. (tfesenmyer@kslaw.com); and (ii) Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market Street, Suite 1600, Wilmington, Delaware 19801, (Attn: Robert J. Dehney (rdehney@morrisnichols.com)); so as to be received **on or before 4:00 p.m. on August 21, 2025.**

PLEASE TAKE FURTHER NOTICE that if you fail to respond in accordance with this Notice, the Court may grant the relief demanded by the Motion without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that if an objection is properly filed and served in accordance with the above procedure, a hearing will be held on **September 11, 2025 at 3:00 p.m.** before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge for the District of Delaware, 824 North Market Street, 3rd Floor, Court Room #7, Wilmington, Delaware 19801. Only objections made in writing and timely filed will be considered by the Bankruptcy Court at such hearing only objections made in writing and timely filed will be considered by the Bankruptcy Court at such hearing.

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Dated: August 7, 2025
Wilmington, Delaware

/s/ Michael W. Yurkewicz

Michael W. Yurkewicz (DE Bar No. 4165)

KLEHR HARRISON HARVEY

BRANZBURG LLP

919 North Market Street, Suite 1000

Wilmington, Delaware 19801

Telephone: (302) 426-1189

Facsimile: (302) 426-9193

Email: myurkewicz@klehr.com

Counsel to the Plan Administrator