

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

Saga Formations, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

Hearing Date: July 16, 2025 at 10:00 a.m. ET

Obj. Deadline: July 7, 2025 at 4:00 p.m. ET

**SUPPLEMENT TO THIRD INTERIM FEE
APPLICATION OF PASHMAN STEIN WALDER HAYDEN, P.C.**

Pashman Stein Walder Hayden, P.C. (“Pashman”), 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 supplements the *Notice of Certain Trustee’s Professionals’ Third Interim Fee Applications for the Period March 1, 2025, through and including May 31, 2025* [D.I. 791] (the “Third Interim Application”) for the period from March 1, 2025 through May 31, 2025 (the “Application Period”) by attaching, as **Exhibits A** through **E** hereto, certain schedules requested by the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the “UST Guidelines”). In addition, Pashman respectfully states as follows to address the questions set forth under section C.5 of the UST Guidelines:

- a. Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain. **No.**
- b. If the fees sought in this fee application as compared to the fees budgeted

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).



for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client? **Not Applicable.**

- c. Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case? **No.**
- d. Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application). If so, please quantify by hours and fees. **No. Pashman reserves the right to seek such fees in subsequent applications.**
- e. Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees. **No.**
- f. If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? and (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458? **Pashman implemented a firm-wide annual rate increase effective January 1, 2025 covering fees incurred during the Application Period. See Notice of Change in Hourly Rates of Pashman Stein Walder Hayden, P.C. [D.I. 401] filed on December 16, 2024. Moreover, the rate increase is consistent with the Engagement Letter, which provides that rates included therein are adjusted from time to time and specifically at the beginning of each year.**

Respectfully submitted this 23rd date of June, 2025.

**PASHMAN STEIN WALDER
HAYDEN, P.C.**

/s/ Alexis R. Gambale

Henry J. Jaffe (No. 2987)

Joseph C. Barsalona II (No. 6102)

Alexis R. Gambale (No. 7150)

824 N. Market Street, Suite 800

Wilmington, DE 19801

Telephone: (302) 592-6496

Email: hjaffe@pashmanstein.com

jbarsalona@pashmanstein.com

agambale@pashmanstein.com

Co-counsel to the Trustee

Exhibit A**CUSTOMARY AND COMPARABLE
COMPENSATION DISCLOSURES**

Pashman's hourly rates for bankruptcy services are comparable or less than the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. In addition, Pashman's hourly rates for Bankruptcy, Restructuring & Creditors' Rights services are comparable to the rates charged by the firm to other commercial clients, including the firm's Corporate & Business Law, Commercial Litigation, Criminal Defense and Alternative Dispute Resolution departments. Additionally, Pashman's hourly rates are comparable to other skilled practitioners in other firms for complex corporate and litigation matters, whether in court or otherwise, regardless of whether a fee application is required.

<u>Category of Timekeeper</u>	<u>Blended Hourly Rate</u>	
	Billed Preceding Year, Excluding Bankruptcy¹	Billed this Application
Partners	\$575.00	\$837.50
Senior Counsel	\$601.00	N/A
Counsel	\$413.00	\$650.00
Associates	\$376.00	\$495.00
Paraprofessionals	\$282.00	\$430.00

¹ The blended hourly rate excludes the firm's primarily consumer practice groups, including its Trust & Estates and Family Law departments.

Exhibit B**SUMMARY OF TIMEKEEPERS INCLUDED IN FIRST INTERIM APPLICATION**

Name of Professional	Position of the Applicant, Area of Expertise, Number of Years in that Position, Year of Obtaining License to Practice	Hourly Billing Rate	Total Billed Hours	Total Compensation
John W. Weiss	Partner /Bankruptcy. Joined the firm as a partner in 2022. Member of the NJ Bar since 2001. Member of the NY Bar since 2004. Member of the PA Bar since 2001. Member of the DE Bar since 2001	\$980.00	3.00	\$2,940.00
Henry J. Jaffe	Partner/Bankruptcy. Joined the firm as a partner in 2023. Member of the DE Bar since 1991. Member of the PA bar since 1995.	\$980.00	54.20	\$53,116.00
Joseph C. Barsalona II	Partner /Bankruptcy. Joined the firm as a partner in 2022. Member of the NJ Bar since 2012. Member of the NY Bar since 2013. Member of the DE Bar since 2015.	\$695.00	202.20	\$140,529.00
Richard. W. Riley	Counsel/Bankruptcy. Joined the firm as a counsel in 2025. Member of the DE Bar since 2001. Member of the PA Bar since 1988. Member of the NJ Bar since 1988.	\$650.00	14.00	\$9,100.00
David E. Sklar	Associate/Bankruptcy. Joined the firm as an associate in 2024. Member of the NJ Bar since 2013. Member of the NY Bar since 2014.	\$545.00	22.90	\$12,480.50
Alexis R. Gambale	Associate/Bankruptcy. Joined the firm as an associate in 2024. Member of the DE Bar since 2023. Member of the PA Bar since 2022. Member of the NJ Bar since 2021.	\$485.00	220.00	\$106,700.00
Katherine R. Beilin	Associate/Bankruptcy. Joined the firm as an associate in 2022. Member of the NJ Bar since 2021.	\$450.00	76.50	\$37,102.50
Dwij Patel	Associate/Bankruptcy. Joined the firm as an associate in 2024. Member of the NJ Bar since 2024. Member of the NY Bar since 2022.	\$465.00	12.30	\$5,719.50
Leslie Salcedo	Paralegal	\$430.00	159.40	\$68,542.00
Total			764.50	\$436,229.50

Exhibit C-1**BUDGET**

Category Description	Estimated Hours	Estimated Fees
Case Administration	10.00	\$5,000.00
Asset Analysis and Recovery	10.00	\$5,000.00
Asset Disposition	450.00	\$185,000.00
Relief from Stay/Adequate Protection Proceedings	25.00	\$10,000.00
Meeting of and Communication with Creditors	25.00	\$10,000.00
Fee/Employment Applications	220.00	\$70,000.00
Fee/Employment Objections	10.00	\$5,000.00
Assumption/Rejection of Leases and Contracts	50.00	\$20,000.00
Other Contested Matters	135.00	\$55,000.00
Financing/Cash Collections	5.00	\$1,000.00
Claims Administration and Objections	20.00	\$10,000.00
Plan and Disclosure Statement	5.00	\$1,000.00
General Bankruptcy Advice/Opinion	200.00	\$100,000.00
Trial and Hearing Attendance	10.00	\$5,000.00
TOTAL	1,175.00	\$482,000.00

Exhibit C-2**Staffing Plan**

Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter During the Budget Period	Average Hourly Rate
Partners	3	\$810.00
Of Counsel		
Counsel	1	\$650.00
Associates	4	\$495.00
Paraprofessionals	1	\$430.00

Exhibit D**Summary of Compensation and Expense Reimbursement**

Category Description	Hours Billed	Total Fees
Case Administration	8.20	\$3,958.50
Asset Analysis and Recovery	5.50	\$3,748.50
Asset Disposition	297.40	\$175,429.50
Relief from Stay/Adequate Protection Proceedings	15.60	\$8,380.00
Meeting of and Communication with Creditors	16.90	\$9,039.50
Fee/Employment Applications	141.00	\$68,011.00
Fee/Employment Objections	6.60	\$3,503.00
Assumption/Rejection of Leases and Contracts	33.80	\$18,026.50
Other Contested Matters	89.60	\$51,228.50
Non-Working Travel	0.00	\$0.00
Business Operations	0.00	\$0.00
Employee Benefits/Pensions	0.00	\$0.00
Financing/Cash Collections	0.90	\$562.50
Claims Administration and Objections	12.70	\$7,360.00
Plan and Disclosure Statement	1.00	\$569.00
General Bankruptcy Advice/Opinion	130.00	\$83,152.50
Trial and Hearing Attendance	5.30	\$3,260.50
TOTAL	764.50	\$436,229.50

Expense Category	Total Expenses
Delivery Services/Messengers	\$144.70
Copy Services	\$1,584.97
Transcripts	\$548.10
TOTAL	\$2,277.77

Exhibit E

Summary of Third Interim Application	
Name of Applicant	Pashman Stein Walder Hayden, P.C.
Name of Client	Claudia Z. Springer, Esq. as Chapter 11 Trustee
Time period covered by Third Interim Application	March 1, 2025 through May 31, 2025
Total compensation sought during the Application Period	\$436,229.50
Total expenses sought during the Application Period	\$2,277.77
Petition Date	September 16, 2024, order for relief
Retention Date	October 28, 2024 <i>nunc pro tunc</i> to September 23, 2024
Date of Order Approving Employment	October 28, 2024, D.I. 211
Total compensation approved by interim order to date	\$1,026,415.00
Total expenses approved by interim order to date	\$12,932.18
Total allowed compensation paid to date	\$1,247,326.20 (Previous Fee Application and 80% sixth and seventh monthly)
Total allowed expenses paid to date	\$13,986.41 (Previous Fee Application and 100% sixth and seventh monthly)
Blended rate in the Third Interim Application for all attorneys	\$570.61
Blended rate in the Third Interim for all timekeepers	\$607.65
Compensation sought in the Third Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed	\$220,911.20
Expenses sought in the Third Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed	\$1,054.23
Number of professionals included in the Second Interim Application	8
If applicable, number of professionals in the Third Interim Fee Application not included in the staffing plan approved by client	1
If applicable, difference between fees budgeted and compensation sought during the Application Period	N/A
Number of professionals billing fewer than 15 hours to the case during the Application Period	3
Any rates higher than those approved or disclosed at retention?	No