

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

FULCRUM BIOENERGY, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-12008 (TMH)

(Jointly Administered)

**Objection Deadline:**

**June 23, 2025, at 4:00 p.m. (ET)**

**Hearing Date:**

**August 4, 2025, at 10:00 a.m. (ET)**

**Re: D.I. 591**

**RE-NOTICE OF SEVENTH MONTHLY FEE APPLICATION (FOR THE PERIOD  
FROM MARCH 1, 2025 THROUGH MAY 5, 2025) AND FINAL FEE APPLICATION OF  
MORRIS, NICHOLS, ARSHT & TUNNELL LLP, AS BANKRUPTCY COUNSEL FOR  
THE DEBTORS AND DEBTORS IN POSSESSION, FOR ALLOWANCE OF  
MONTHLY COMPENSATION AND FOR REIMBURSEMENT OF ALL ACTUAL AND  
NECESSARY EXPENSES INCURRED FOR THE PERIOD SEPTEMBER 9, 2024,  
THROUGH AND INCLUDING MAY 5, 2025**

**PLEASE TAKE NOTICE** that, on June 2, 2025, Morris, Nichols, Arsht & Tunnell LLP  
(the “Applicant”) filed and served the attached *Seventh Monthly Fee Application (for the Period  
from March 1, 2025 Through May 5, 2025) and Final Fee Application of Morris, Nichols, Arsht  
& Tunnell LLP, as Bankruptcy Counsel for the Debtors and Debtors In Possession, for Allowance  
of Monthly Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred*

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with each debtor’s federal tax identification numbers are: Fulcrum BioEnergy, Inc. (3733); Fulcrum Sierra BioFuels, LLC (1833); Fulcrum Sierra Finance Company, LLC (4287); and Fulcrum Sierra Holdings, LLC (8498). The location of the Debtors’ service address is WSFS Bank, 500 Delaware Avenue, Wilmington, DE 19801, Attn: Patrick Healy.



*for the Period September 9, 2024, Through and Including May 5, 2025* [D.I. 591](the “Fee Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that, objections, if any, to the Fee Application must be filed and served no later than **June 23, 2025 at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”) upon on the following parties (the “Fee Notice Parties”):

- (i) the Applicant: Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, 16th Floor, Wilmington, DE 19801, Attn: Robert J. Dehney, Sr., rdehney@morrisnichols.com; Curtis S. Miller, cmiller@morrisnichols.com; and Avery Jue Meng, ameng@morrisnichols.com.
- (ii) counsel to the Committee: (a) Eversheds Sutherland (US) LLP, The Grace Building, 40th Floor, 1114 Avenue of the Americas, New York, New York 10036, Attn: Jennifer Kimble, jenniferkimble@eversheds-sutherland.com and Sameer M. Alifarag, sameeralifarag@eversheds-sutherland.com, Evershed Sutherland (US) LLP, 999 Peachtree Street NW, Suite 2300, Atlanta, Georgia 30309, Attn: Todd C. Meyers, toddmeyers@eversheds-sutherland.com, and (b) Morris James LLP, 500 Delaware Avenue, Suite 1500 Wilmington, DE 19801, Attn: Jeffrey R. Waxman, jwaxman@morrisjames.com; Eric J. Monzo, emonzo@morrisjames.com; and Christopher M. Donnelly, cdonnelly@morrisjames.com; and
- (iii) the U.S. Trustee: Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 Attn: Rosa Sierra-Fox, rosa.sierra-fox@usdoj.gov.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Fee Application (the “Hearing”) before the Honorable Thomas M. Horan, United States Bankruptcy Court Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd floor, Courtroom #7, Wilmington, Delaware 19801, will take place on **August 4, 2025, at 10:00 a.m. (Eastern Time)**. If the Hearing is to be held by Zoom videoconference, instructions to appear by Zoom will be provided in the agenda prior to the Hearing.

**PLEASE TAKE FURTHER NOTICE** that only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the court at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that if you fail to respond in accordance with this notice, the court may grant the relief requested in the Application without further notice or hearing.

Dated: June 3, 2025  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Avery Jue Meng  
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