

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

In re: PLASTIQ, INC., <i>et al.</i> , Debtors. ¹	Chapter 11 Case No. 23-10671 (BLS) Obj. Deadline: December 4, 2023, at 4:00 p.m. (ET)
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**SUMMARY OF THIRD MONTHLY FEE APPLICATION OF
DUNDON ADVISERS LLC, FINANCIAL ADVISOR FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR
THE PERIOD FROM SEPTEMBER 1, 2023, TO SEPTEMBER 29, 2023**

Name of Applicant:	Dundon Advisers LLC
Authorized to Provide Services to:	Official Committee of Unsecured Creditors
Date of Retention:	July 24, 2023, effective as of June 9, 2023 [D.I. 197]
Period for which Compensation/ Reimbursement is Sought:	September 1, 2023 – September 29, 2023
Total Compensation Sought as Actual, Reasonable and Necessary, of which 80% is Payable upon approval hereof	\$34,558.00
Expense reimbursement sought as Actual Reasonable and Necessary, of which 100% is Payable upon approval hereof	\$0.00

This is a: monthly interim final application

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: PlastiQ Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.



PRIOR MONTHLY FEE APPLICATIONS

Date Filed	Period Covered	Stated Fees	Expenses	Approval Status	Payments Received
8/8/23 [D.I. 248]	6/9/23 - 6/30/23	\$86,060.00	\$0.00	CNO – [D.I. 286] 8/31/23	\$68,848.00
9/18/23 [D.I. 311]	07/01/23 - 08/31/23	\$33,803.00	\$0.00	CNO – [D.I. 321] 9/26/23	\$27,042.40

NO PRIOR INTERIM FEE APPLICATIONS**FEE SUMMARY BY PROFESSIONAL**

<i>Name</i>	<i>Rate</i>	<i>Hours</i>	<i>Fees</i>
Matthew Dundon	\$	3.4	\$ 3,026.00
Eric Reubel	\$790.00	16.5	\$ 13,035.00
Josh Nahas	\$790.00	14.8	\$ 11,692.00
Jillian Lin	\$650.00	-	\$ -
Greg Hill	\$550.00	12.2	\$ 6,710.00
Chris Podesfinski	\$475.00	-	\$ -
Michael Whalen	\$475.00	0.2	\$ 95.00
Total		47.1	\$ 34,558.00

FEE SUMMARY BY TASK CODE

<i>Categories</i>	<i>Hours</i>	<i>Fees</i>
Business Analysis	2.8	\$1,732.00
Case Administration	0.6	\$474.00
Claims Analysis	7.6	\$4,780.00
Committee Member/Professional Meetings & Communications	2.4	\$1,800.00
Debtor Professional and Client Meeting	0.0	\$0.00
Debtor/Lender Professional and Staff Meetings	0.0	\$0.00
Exit Planning and Post-Effective Date Planning	23.2	\$17,477.00
Investigations	0.0	\$0.00
Other Professionals' Retention and Fee Applications	0.3	\$237.00
Plan and Disclosure Statement	1.4	\$1,106.00
Retention and Fee Applications ¹	8.7	\$6,873.00
Sales Process	0.1	\$79.00
Total	47.1	\$34,558.00

¹ This category contains 5.5 hours of work performed after the effective date to prepare the third monthly fee application for the September period and the final fee application.

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

In re:

PLASTIQ, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10671 (BLS)

Obj. Deadline: December 4, 2023, at 4:00 p.m. (ET)

**THIRD MONTHLY FEE APPLICATION OF
DUNDON ADVISERS LLC, FINANCIAL ADVISOR FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR
THE PERIOD FROM SEPTEMBER 1, 2023, TO SEPTEMBER 29, 2023**

Dundon Advisers, LLC (“Dundon”) files this third monthly fee application (the “Third Monthly Fee Application” or this “Application”) seeking compensation for services rendered and reimbursement of expenses incurred in its capacity as financial advisor for the Official Committee of Unsecured Creditors appointed in the above-referenced bankruptcy case (the “Committee”) for the period from September 1, 2023, through September 29, 2023 (the “Fee Period”). Pursuant to this Application, Dundon seeks allowance of compensation for professional services Dundon performed services during the Fee Period in the amount of \$34,558.00, less a twenty percent (20%) holdback in the amount of \$6,911.60, for an immediately payable fee request of \$27,646.40. Dundon did not incur expenses during the Fee Period. Immediately payable fees and expenses total to \$27,646.40. The statutory and legal predicates for the relief sought herein are sections 330, 331, and 1103 of chapter 11 title of title 11 of the United States Code, 11 U.S.C. § 101, et seq. (the “Bankruptcy Code”), Rule 2016(a) of the Federal Rules of Bankruptcy Procedure (the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PlastiQ Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.

“Bankruptcy Rules”) and Rule 2016 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) and this Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 110] (the “Interim Compensation Order”). The total amount sought for fees represents 47.1 hours of professional services. In support of this Application, Dundon shows the Court the following:

I. BACKGROUND

1. On May 24, 2023 (the “Petition Date”), the Debtors each filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code.

2. The Debtors are entitled to, and upon information and belief of the undersigned continues to, operate and manage its businesses as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108. No request has been made for the appointment of a trustee or an examiner.

3. On June 7, 2023, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Committee as an official committee of unsecured creditors pursuant to Bankruptcy Code section 1102 [D.I. 65]. The Committee consists of the following members:(i) Globant, LLC; (ii) Brex, Inc. and (iii) Bowei Liu.

4. On June 8, 2023, the Committee selected DLA Piper LLP to serve as its counsel; on June 9, 2023, the committee selected Dundon Advisers, LLC to serve as its financial advisor.

5. This Court (the “Court”) on July 24, 2023, entered an *Order Approving Application Pursuant to 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Dundon Advisers LLC as Financial Advisor for the Committee* (the “Retention Order”) [D.I. 197], effective as of June 9, 2023.

II. JURISDICTION AND VENUE

6. This Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

7. The statutory predicates for the relief sought herein are sections 328(a) and 1103 of the Bankruptcy Code, and Bankruptcy Rule 2016.

III. RELIEF REQUESTED

8. Pursuant to the Retention Order, the Interim Compensation Order, and Sections 328(a), 330, and 331 of the Bankruptcy Code, Dundon seeks: allowance and payment of compensation for professional services Dundon performed during the Fee Period in the amount of \$34,558.00, less a twenty percent (20%) holdback in the amount of \$6,911.60, for an immediately payable fee request of \$27,646.40. Dundon did not incur expenses during the Fee Period. Immediately payable fees and expenses total to \$27,646.40.

9. Dundon has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the fees sought to be paid pursuant to this Application. With respect to the fees requested by Dundon, there is no agreement or understanding between Dundon and any other person, other than the members of the firm, for the sharing of compensation to be received for services rendered in this case.

10. All financial advisory services provided by Dundon during the Fee Period were performed on behalf of the Committee, and not on behalf of any other person or entity.

11. This is Dundon's Third Monthly Fee Application.

IV. SUMMARY OF SERVICES RENDERED AND EXPENSES INCURRED

12. Dundon has maintained detailed records of the time spent in rendition of professional services to the Committee during the Fee Period. Attached hereto as Exhibit "A" and incorporated herein by reference are detailed time records for services rendered during the Fee Period. The time records include the date that the services were rendered, a detailed narrative description of the services provided, the amount of time spent for each service and the designation of the professional who performed the service.

13. Services rendered during the Fee Period can be grouped as follows:

<i>Categories</i>	<i>Hours</i>	<i>Fees</i>
Business Analysis	12.7	\$1,732.00
Case Administration	0.6	\$474.00
Claims Analysis	2.5	\$4,780.00
Committee Member/Professional Meetings & Communications	2.3	\$1,800.00
Debtor Professional and Client Meeting	0.0	\$0.00
Debtor/Lender Professional and Staff Meetings	0.0	\$0.00
Exit Planning and Post-Effective Date Planning	18.5	\$17,477.00
Investigations	0.0	\$0.00
Other Professionals' Retention and Fee Applications	0.3	\$237.00
Plan and Disclosure Statement	1.4	\$1,106.00
Retention and Fee Applications	8.7	\$6,873.00
Sales Process	0.1	\$79.00
Total	47.1	\$34,558.00

14. Dundon professionals have expended a total of 47.1 hours in connection with this matter during the Fee Period, as follows:

<i>Name</i>	<i>Rate</i>	<i>Hours</i>	<i>Fees</i>
Matthew Dundon	\$890.00	3.4	\$ 3,026.00
Eric Reubel	\$790.00	16.5	\$ 13,035.00
Josh Nahas	\$790.00	14.8	\$ 11,692.00
Jillian Lin	\$650.00	-	\$ -
Greg Hill	\$550.00	12.2	\$ 6,710.00
Chris Podesfinski	\$475.00	-	\$ -
Michael Whalen	\$475.00	0.2	\$ 95.00

Total		47.1	\$ 34,558.00
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15. The following are summaries of the more material project categories for Dundon's professional services during the Fee Period:

a. Business Analysis

During the Fee Period Dundon personnel: (i) reviewed and analyzed the Debtor's monthly operating reports and (ii) monitored the case docket.

Hours: 2.8 // Fees: \$1,732.00

b. Claims Analysis

During the Fee Period Dundon personnel: (i) preliminarily reviewed and analyzed the claims pool and (ii) potential post-effective date claims.

Hours: 7.6 // Fees: \$4,780.00

c. Meetings and Communications with Committee Members and Professionals

During the Fee Period Dundon personnel: (i) met frequently (over zoom, teleconference, or in-person), corresponded often over email and worked closely with committee counsel to develop and prepare case strategy; (ii) participated in regularly scheduled committee meeting; (iii) prepared analyses and presentations to support communications with committee members.

Hours: 2.4 // Fees: \$1,800.00

d. Exit and Post-Effective Date Planning

During the Fee Period Dundon personnel: (i) met frequently (over zoom, teleconference, or in-person) to prepare for establishing a post-confirmation trust.

Hours: 23.2 // Fees: \$17,447.00

e. Plan and Disclosure Statement

During the Fee Period, Dundon personnel met frequently (over zoom, teleconference, or in-person) and corresponded often over email with the Debtor's professionals. Dundon personnel (i) reviewed and analyzed drafts of the proposed plan and disclosure

statement; (ii) reviewed and analyzed drafts of the proposed liquidating trust agreement; (iii) attended hearings.

Hours: 1.4 // Fees: \$1,106.00

f. Retention and Fee Applications

During the Fee Period, Dundon personnel (i) attended to Dundon's retention application; (ii) prepared monthly fee applications.

Hours: 8.7 // Fees: \$6,873.00

16. Dundon did not incur any expenses in connection with Dundon's service as financial advisor to the Committee during the Fee Period and does not seek reimbursement of expenses in this Application.

17. Pursuant to Del. Bankr. L.R. 2016-2(e)(iii), Dundon charges no more than (i) \$0.10 per page for standard photocopies and (ii) actual cost for computer-assisted research. Dundon does not charge for outgoing or incoming facsimile transmissions. Dundon reserves the right to request, in subsequent fee applications, reimbursement of any additional expenses incurred during the Fee Period, as such expenses may not have been captured to date in Dundon's billing system.

V. NOTICE

Notice of this Application will be served upon each party to whom such notice is required under the Interim Compensation Order.

VI. CONCLUSION

WHEREFORE, Dundon hereby respectfully requests interim allowance of its fees in the amount of \$34,558.00, less a twenty percent (20%) holdback in the amount of \$6,911.60, for an immediately-payable fee request of \$27,646.40. Dundon did not incur any expenses during the Fee Period. Immediately-payable fees and expenses total to \$27,646.40.

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Dated: November 13, 2023

DUNDON ADVISERS LLC

/s/Eric A. Reubel

Eric A. Reubel

10 Bank Street, Suite 1100

White Plains, NY 10606

Telephone: (917) 626-4051

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*Financial Advisor to the Official Committee of
Unsecured Creditors*

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

In re:

PLASTIQ, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10671 (BLS)

Obj. Deadline: December 4, 2023, at 4:00 p.m. (ET)

**NOTICE OF THIRD MONTHLY FEE APPLICATION OF
DUNDON ADVISERS LLC, FINANCIAL ADVISOR FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR
THE PERIOD FROM SEPTEMBER 1, 2023, TO SEPTEMBER 29, 2023**

TO: The “Notice Parties” designated in the Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, Dated June 19, 2023 [D.I. 110].

PLEASE TAKE NOTICE that on November 13, 2023, the Third Monthly Fee Application of Dundon Advisers, Financial Advisor for the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtor and debtor in possession (the “Debtor”), for Compensation and Reimbursement of Expenses for the Period from September 1, 2023, through September 29, 2023 (the “Fee Application”) was filed with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). By the Fee Application, Dundon Advisers LLC (“Dundon”) seeks the allowance and payment of interim compensation in the amount of \$27,646.40 (80% of \$34,558.00). Dundon did not incur any expenses in connection with Dundon’s service as financial advisor to the Committee during the period from September 1, 2023 through September 29, 2023 (the “Application Period”).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Fee Application must be filed with the Bankruptcy Court in accordance with the local rules and served upon the undersigned counsel on or before **December 4, 2023 at 4:00 p.m. (ET)**. Copies of the Fee Application are available upon written request to the undersigned. A hearing on the Fee Application shall be held only in the event timely objections are filed.

PLEASE TAKE FURTHER NOTICE that pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 199], in the absence of any objection or responsive pleading to the Fee Application, Dundon is authorized to file a Certificate of No Objection with the Bankruptcy Court, after which the Debtor is authorized and directed to pay Dundon an amount equal to \$27,646.40 (80% of \$34,558.00) and

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100% of the expenses (\$0.00) requested in the Fee Application (the “Maximum Monthly Payment”). If an objection to the Fee Application is timely filed and served, the Debtor is authorized and directed to pay Dundon an amount equal to the lesser of (i) the Maximum Monthly Payment and (ii) 80% of the fees and 100% of the expenses not subject to an objection.

Dated: November 13, 2023
Wilmington, Delaware

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Aaron S. Applebaum

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-and-

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*Counsel for the Official Committee of Unsecured
Creditors*

Exhibit A**Billing Detail**

Timekeeper	Date	Description	Task Code	Hours	Rate	Fee
Dundon	9/1/2023	Review and discussion of proposed trust banking terms.	Exit and Post-Effective Date Planning	0.6	\$ 890.00	\$ 534.00
Dundon	9/1/2023	Discussion with J. Nahas of litigation trust scope and budget	Exit and Post-Effective Date Planning	0.3	\$ 890.00	\$ 267.00
Dundon	9/6/2023	Review and discussion of proposed trust banking terms.	Exit and Post-Effective Date Planning	0.6	\$ 890.00	\$ 534.00
Reubel	9/7/2023	Attend to scheduling; review agenda	Case Administration	0.1	\$ 790.00	\$ 79.00
Reubel	9/7/2023	Meet w/ DLA-Dundon re: litigation trust funding	Exit and Post-Effective Date Planning	0.4	\$ 790.00	\$ 316.00
Reubel	9/8/2023	Dundon-DLA pre-call for UCC meeting (.4); attend UCC call (.5)	Committee Member/Professional Meetings & Communications	0.7	\$ 890.00	\$ 267.00
Dundon	9/8/2023	Discussion with J. Nahas of litigation trust insurance	Exit and Post-Effective Date Planning	0.3	\$ 790.00	\$ 553.00
Nahas	9/9/2023	Create draft budget for post exit trust	Exit and Post-Effective Date Planning	0.7	\$ 790.00	\$ 553.00
Reubel	9/9/2023	Correspond w/ M. Dundon and J. Nahas re: LT liability insurance	Exit and Post-Effective Date Planning	0.1	\$ 790.00	\$ 79.00
Dundon	9/10/2023	Discussion with E. Reubel and J. Nahas of litigation trust insurance	Exit and Post-Effective Date Planning	0.4	\$ 890.00	\$ 356.00
Nahas	9/10/2023	Discussion with E. Reubel and M. Dundon of litigation trust insurance	Exit and Post-Effective Date Planning	0.4	\$ 790.00	\$ 316.00
Reubel	9/10/2023	Telecon discussion w/ M. Dundon and J. Nahas re: trust liability insurance	Exit and Post-Effective Date Planning	0.4	\$ 790.00	\$ 316.00
Hill	9/11/2023	Analysis of monthly operating reports	Business Analysis	1.1	\$ 550.00	\$ 605.00
Nahas	9/11/2023	Call with E Reubel and CACS to discuss pricing of D&O insurance	Exit and Post-Effective Date Planning	0.5	\$ 790.00	\$ 395.00
Reubel	9/11/2023	Correspond w/ B. Kroupa, CAC re: liability insurance (.1); telecon discussion re: same (.1)	Exit and Post-Effective Date Planning	0.2	\$ 790.00	\$ 158.00
Reubel	9/11/2023	Telecon discussion w/ J. Nahas re: CAC liability insurance coverage and pricing	Exit and Post-Effective Date Planning	0.5	\$ 790.00	\$ 395.00
Hill	9/12/2023	Review of docket and DS	Business Analysis	0.9	\$ 550.00	\$ 495.00

Hill	9/12/2023	Trust action plan and budget estimates	Exit and Post-Effective Date Planning	4.1	\$ 550.00	\$ 2,255.00
Reubel	9/12/2023	Review order approving sale transaction fee [D.I. 302]	Other Professionals' Retention and Fee Applications	0.1	\$ 790.00	\$ 79.00
Reubel	9/12/2023	Review PPP August staffing report [D.I. 298]	Other Professionals' Retention and Fee Applications	0.2	\$ 790.00	\$ 158.00
Reubel	9/12/2023	Review Ewing declaration re: plan voting tabulation and results [D.I. 299]	Plan and Disclosure Statement	0.2	\$ 790.00	\$ 158.00
Reubel	9/12/2023	Review DS hearing agenda [D.I. 305]	Plan and Disclosure Statement	0.1	\$ 790.00	\$ 79.00
Reubel	9/12/2023	Review YCST confirmation brief and memorandum of law [D.I. 304]	Plan and Disclosure Statement	0.4	\$ 790.00	\$ 316.00
Reubel	9/12/2023	Review amended combined plan & DS redline [D.I. 301]	Plan and Disclosure Statement	0.2	\$ 790.00	\$ 158.00
Reubel	9/12/2023	Review YCST proposed confirmation order [D.I. 300]	Plan and Disclosure Statement	0.5	\$ 790.00	\$ 395.00
Hill	9/13/2023	Analysis of claims in the claims register and estimates of initial recoveries	Claims Analysis	5.1	\$ 550.00	\$ 2,805.00
Nahas	9/13/2023	Review claims register and compare to scheduled claims	Claims Analysis	2.5	\$ 790.00	\$ 1,975.00
Reubel	9/13/2023	Review UCC meeting presentation	Committee Member/Professional Meetings & Communications	0.2	\$ 790.00	\$ 553.00
Nahas	9/13/2023	Review and revise UCC trust presentation	Exit and Post-Effective Date Planning	0.7	\$ 790.00	\$ 553.00
Nahas	9/13/2023	Review omnibus claims objection to series of equity claims filed as GUCs	Exit and Post-Effective Date Planning	0.7	\$ 790.00	\$ 158.00
Whalen	9/13/2023	Analyzed scheduled vs. filed claim duplicates with G. Hill	Exit and Post-Effective Date Planning	0.2	\$ 475.00	\$ 95.00
Reubel	9/14/2023	Attend confirmation hearing	Case Administration	0.4	\$ 790.00	\$ 316.00
Reubel	9/14/2023	Prepare combined July-August fee application	Retention and Fee Applications	2.0	\$ 790.00	\$ 1,580.00
Reubel	9/16/2023	Revise and finalize July-August fee application	Retention and Fee Applications	1.0	\$ 790.00	\$ 790.00
Reubel	9/18/2023	Review PPP update checklist re: post-effective date wind-down (.2); correspond w/ J. Nahas re: same (.1)	Exit and Post-Effective Date Planning	0.3	\$ 790.00	\$ 237.00
Reubel	9/18/2023	Correspond w/ J. Nahas re: exit planning next steps	Exit and Post-Effective Date Planning	0.1	\$ 790.00	\$ 79.00

Reubel	9/18/2023	Review and approve DLA edits to Dundon fee application	Retention and Fee Applications	0.1	\$ 790.00	\$ 79.00
Reubel	9/19/2023	Attend to call scheduling	Case Administration	0.1	\$ 790.00	\$ 632.00
Nahas	9/19/2023	Review and analyze trust items to be completed prior to plan exit	Exit and Post-Effective Date Planning	0.8	\$ 790.00	\$ 395.00
Nahas	9/19/2023	Review KCC bank and wire proposal	Exit and Post-Effective Date Planning	0.5	\$ 790.00	\$ 79.00
Nahas	9/20/2023	Read and review convertible note agreement for potential subordination claims	Business Analysis	0.8	\$ 890.00	\$ 267.00
Nahas	9/20/2023	Call with E Reubel to prep for UCC call	Committee Member/Professional Meetings & Communications	0.1	\$ 550.00	\$ 220.00
Hill	9/20/2023	Participated in committee call with UCC members and professionals from Dundon and DLA	Committee Member/Professional Meetings & Communications	0.4	\$ 790.00	\$ 632.00
Nahas	9/20/2023	UCC meeting pre-call w/ E. Reubel (.1)/ Attend UCC call (.4)	Committee Member/Professional Meetings & Communications	0.5	\$ 790.00	\$ 79.00
Reubel	9/20/2023	UCC meeting pre-call w/ J. Nahas (.1)/ Attend UCC call (.4)	Committee Member/Professional Meetings & Communications	0.5	\$ 790.00	\$ 395.00
Dundon	9/20/2023	Attention to liquidating trust banking matters.	Exit and Post-Effective Date Planning	0.3	\$ 790.00	\$ 395.00
Nahas	9/20/2023	Develop list of next step action items for trust	Exit and Post-Effective Date Planning	0.5	\$ 790.00	\$ 395.00
Reubel	9/20/2023	Review supplemental assumed and assigned contract list in connection w/ sale [D.I. 318]	Sales Process	0.1	\$ 790.00	\$ 79.00
Nahas	9/25/2023	Review exit / effective date check list items	Exit and Post-Effective Date Planning	0.5	\$ 790.00	\$ 395.00
Nahas	9/25/2023	Read and review bank acct and insurance information	Exit and Post-Effective Date Planning	1.5	\$ 790.00	\$ 1,185.00
Nahas	9/26/2023	Call with KCC on bank account set up	Exit and Post-Effective Date Planning	0.3	\$ 790.00	\$ 237.00
Reubel	9/26/2023	Correspond w/ A. Applebaum re: final fee application	Retention and Fee Applications	0.1	\$ 790.00	\$ 79.00
Dundon	9/28/2023	Finalization of liquidating trust banking matters.	Exit and Post-Effective Date Planning	0.2	\$ 890.00	\$ 178.00
Dundon	9/28/2023	Discussion with J. Nahas of US Trustee obligations of estate and Liquidating Trust.	Exit and Post-Effective Date Planning	0.2	\$ 890.00	\$ 178.00
Dundon	9/28/2023	Call with potential Trust insurer underwriters	Exit and Post-Effective Date Planning	0.5	\$ 890.00	\$ 445.00

Hill	9/28/2023	Participated in call with Portage on post-effective planning	Exit and Post-Effective Date Planning	0.6	\$ 550.00	\$ 330.00
Nahas	9/28/2023	Call with Portage Point on transition to trust	Exit and Post-Effective Date Planning	0.7	\$ 790.00	\$ 553.00
Nahas	9/28/2023	D&O call	Exit and Post-Effective Date Planning	0.3	\$ 790.00	\$ 237.00
Nahas	9/28/2023	Review and execute account documents from Western Alliance bank	Exit and Post-Effective Date Planning	0.5	\$ 790.00	\$ 395.00
Reubel	9/28/2023	Attend wind-down discussion w/ Dundon and PPP	Exit and Post-Effective Date Planning	0.7	\$ 790.00	\$ 553.00
Reubel	9/28/2023	Telecon discussion w/ J. Nahas and CAC re: D&O insurance	Exit and Post-Effective Date Planning	0.3	\$ 790.00	\$ 237.00
Nahas	9/29/2023	Call with C Clarke at Western Alliance on bank acct opening and wire info	Exit and Post-Effective Date Planning	0.2	\$ 790.00	\$ 158.00
Nahas	9/29/2023	Call with H Seigel to discuss transition to trust	Exit and Post-Effective Date Planning	0.4	\$ 790.00	\$ 316.00
Nahas	9/29/2023	Call with A Applebaum on issue of double UST fees	Exit and Post-Effective Date Planning	0.2	\$ 790.00	\$ 158.00
Nahas	9/29/2023	Call with M Dundon on Lit Trust agreement and bank acct opening	Exit and Post-Effective Date Planning	0.1	\$ 790.00	\$ 79.00
Nahas	9/29/2023	Attend wind-down discussion w/ Dundon and PPP and Sage re: tax issues and other exit planning (.6); follow-up discussion w/ E. Reubel re: same (.2); correspond w/ A. Applebaum re: exit issues (.2)	Exit and Post-Effective Date Planning	1.0	\$ 790.00	\$ 790.00
Nahas	9/29/2023	Call with J Seigel to discuss going effective and executed lit trust agreement	Exit and Post-Effective Date Planning	0.2	\$ 790.00	\$ 158.00
Nahas	9/29/2023	Call with A Applebaum on lit trust	Exit and Post-Effective Date Planning	0.2	\$ 790.00	\$ 158.00
Reubel	9/29/2023	Attend wind-down discussion w/ Dundon and PPP and Sage re: tax issues and other exit planning (.6); follow-up discussion w/ J. Nahas re: same (.2); correspond w/ A. Applebaum re: exit issues (.2)	Exit and Post-Effective Date Planning	1.0	\$ 790.00	\$ 790.00
Reubel	11/10/2023	Prepare September fee application	Retention and Fee Applications	2.5	\$ 790.00	\$ 1,975.00
Reubel	11/10/2023	Prepare final fee application	Retention and Fee Applications	3.0	\$ 790.00	\$ 2,370.00

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2023, I served or caused to be served the *First Monthly Fee Application of Dundon Advisers LLC, Financial Advisor for the Official Committee of Unsecured Creditors, for Compensation and Reimbursement of Expenses for the Period from September 1, 2023, Through September 29, 2023* and the *Notice of Application* to be made upon the Notice Parties (as defined in the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 110] listed on the attached Service List A, via first class mail and electronic mail, and by CM/ECF upon those parties registered to receive such electronic notifications in these case.

Dated: November 13, 2023

/s/ Aaron S. Applebaum

Aaron S. Applebaum, Esq (DE No. 5587)

SERVICE LIST A
Interim Compensation Order Notice Parties

<p style="text-align: center;">Adam Harris, Esq. Reuben Dizengoff, Esq. Schulte Roth & Zabel LLP 919 Third Avenue New York, NY 10022 adam.harris@srz.com reuben.dizengoff@srz.com</p>	<p style="text-align: center;">Matthew B. Lunn, Esq. Joseph M. Mulvihill, Esq. Young Conaway Stargatt & Taylor, LLP 1000 North King Street Wilmington, DE 19801 mlunn@ycst.com jmulvihill@ycst.com</p>
<p style="text-align: center;">Richard L. Schepacarter, Esq. Office of the U.S. Trustee J. Caleb Boggs Building 844 King Street, Suite 2207 Wilmington, DE 19801 richard.schepacarter@usdoj.gov</p>	<p style="text-align: center;">Matthew McGuire, Esq. Landis Rath & Cobb LLP 919 Market Street, Suite 1800 Wilmington, Delaware 19801 m McGuire@lrclaw.com</p>