

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

In re:

GST, INC.,¹

Debtor.

Chapter 11

Case No. 25-12188 (KBO)

Obj. Deadline: Jan. 23, 2026 at 4:00 p.m. (ET)

Hearing Date: Feb. 2, 2026 at 11:00 a.m. (ET)

**DEBTOR'S MOTION FOR ENTRY OF AN ORDER
ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

GST, Inc., as debtor and debtor in possession (the “Debtor”) in the above-captioned chapter 11 case (this “Chapter 11 Case”), hereby submits this motion (the “Motion”) for entry of an order, substantially in the form annexed hereto as **Exhibit A** (the “Proposed Order”), pursuant to sections 105 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532, as amended (the “Bankruptcy Code”), rule 2016(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), establishing procedures for interim compensation and reimbursement of expenses for court-approved professionals retained by the Debtor and any statutory committees appointed in the Debtor’s Chapter 11 Case (each a “Professional” and collectively, the “Professionals”). In support of this Motion, the Debtor respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Chapter 11 Case and this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States

¹ The last four digits of the Debtor's taxpayer identification number are 1002. The Debtor's corporate headquarters and service address is 322 Culver Boulevard, Suite 150, Playa Del Rey, CA 90293.

District Court for the District of Delaware dated as of February 29, 2012.

2. Venue of this Chapter 11 Case and this Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b), and pursuant to Local Rule 9013-1(f), the Debtor consents to entry of a final order by this Court in connection with this Motion to the extent that it is later determined that this Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

4. The statutory and legal predicates for the relief sought herein are sections 105 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016(a), and Local Rule 2016-1.

BACKGROUND

5. On December 11, 2025, the Debtor commenced a voluntary case under chapter 11 of the Bankruptcy Code. The Debtor is authorized to continue to operate its business and manage its property as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. No statutory committee of unsecured creditors has been appointed by the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) and no trustee or examiner has been appointed in the Chapter 11 Case.

7. Additional factual background relating to the Debtor’s business, capital structure, and the commencement of this Chapter 11 Case is set forth in detail in the *Declaration of Nicholas Rubin in Support of the Debtor’s Chapter 11 Petition and First Day Motions* [D.I. 14].

PROPOSED COMPENSATION PROCEDURES

8. The Debtor has filed or will soon file applications to retain (i) Levene, Neale, Bender, Yoo & Golubchik L.L.P. as the Debtor’s lead bankruptcy counsel; and (ii) Reed Smith

LLP as co-counsel. The Debtor has also filed or will soon file a motion for authority to retain and employ Force Ten Advisors, LLC to provide Nicholas Rubin as Chief Restructuring Officer to the Debtor (but that motion seeks relief under section 363 of the Bankruptcy Code and contains separate compensation procedures for Force Ten Advisors, LLC).

9. The Debtor proposes that, except as otherwise provided in an order of the Court authorizing the retention of a particular Professional, the Professionals be permitted to seek interim payment of compensation and reimbursement of expenses in accordance with the following procedures (the “Compensation Procedures”):

- (a) On or after the 20th day of each month following the month for which compensation is sought, each Professional seeking compensation may file a monthly fee application (the “Monthly Fee Application”)² with the Court and serve a copy of such Monthly Fee Application by electronic mail on each of the following parties:
 - (i) Bankruptcy counsel to the Debtor: (a) Levene, Neale, Bender, Yoo & Golubchik L.L.P., 2818 La Cienega Avenue, Los Angeles, CA 90034; Attn: David L. Neale, Esq. and Krikor J. Meshefejian, Esq., e-mail: DBG@LNBYG.COM and KJM@LNBYG.COM; and (b) Reed Smith LLP, 1201 N. Market Street, Suite 1500, Wilmington, DE 19801, Attn: Kurt F. Gwynne, Esq. and Jason D Angelo, Esq., e-mail: kgwynne@reedsmith.com and jangelo@reedsmith.com;
 - (ii) Counsel to Winners Alliance, Inc: (a) Raines Feldman Littrell LLP, 1350 Avenue of the Americas, 22nd Floor, New York, NY 10019, Attn: Carollynn H.G. Callari, Esq., email: ccallari@raineslaw.com; and (b) Raines Feldman Littrell LLP, 4675 MacArthur Ct, Suite 1550, New Port Beach, CA 92660; Attn: Hami R. Rafatjoo, Esq., email: hrafatjoo@raineslaw.com;
 - (iii) The Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington,

² The first Monthly Fee Application is anticipated to cover the period from the Petition Date through December 31, 2025.

Delaware 19801 Attn: Benjamin Hackman, Esq., e-mail: benjamin.a.hackman@usdoj.gov; and

- (iv) Counsel to any statutory committee appointed in the Chapter 11 Case (collectively with (i), (ii), and (iii), the “Notice Parties”).
- (b) Any Professional that fails to file a Monthly Fee Application for a particular month or months may subsequently submit a consolidated Monthly Fee Application including any prior month or months, which shall comply with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and Local Rules, and otherwise governed by these Compensation Procedures.
- (c) Each Notice Party, and all other parties in interest, will have until 4:00 p.m. (prevailing Eastern Time) on the day that is twenty-one (21) days after service of a Monthly Fee Application to object thereto (the “Objection Deadline”). Twenty-four (24) hours after the expiration of the Objection Deadline, each Professional may file a certificate of no objection with the Court, after which the Debtor is authorized and directed to promptly pay the Professional an amount equal to the lesser of (i) 80% of the fees and 100% of the expenses requested in the Monthly Fee Application (the “Maximum Monthly Payment”) or (ii) 80% of the fees and 100% of the expenses requested in the Monthly Fee Application (the “Reduced Monthly Payment”) that are not subject to an Objection (as defined below).
- (d) If any party objects to a Professional’s Monthly Fee Application, the objecting party must file with the Court on or before the Objection Deadline a written objection (the “Objection”) delineating with particularity the reasons for the Objection to any particular time entry or task in question and serve such Objection on the affected Professional and each of the Notice Parties so that such Objection is received on or before the Objection Deadline. Thereafter, the objecting party and the Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within fourteen (14) days after service of the Objection, the Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Monthly Payment and the Reduced Monthly Payment made to the affected Professional (the “Incremental Amount”) or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection, if requested by the parties.
- (e) At three-month intervals (the “Interim Fee Period”), each of the Professionals may file with the Court and serve on the Notice Parties a request (an “Interim Fee Application”) for interim Court approval and allowance of the compensation and reimbursement of expenses sought by such Professional in its Monthly Fee Applications, including any holdbacks, filed during the

Interim Fee Period, pursuant to section 331 of the Bankruptcy Code. Each Professional shall file its Interim Fee Application within forty-five (45) days after the end of the Interim Fee Period for which the request seeks allowance of compensation and reimbursement of expenses. The first Interim Fee Application should cover the Interim Fee Period from the Petition Date through and including March 31, 2026.

- (f) The Interim Fee Application must include: (i) the Professional seeking compensation; (ii) the Interim Fee Period; (iii) the amount of compensation and expenses sought; (iv) the amount of fees and expenses paid to date or subject to an Objection; (v) the Objection Deadline applicable to the Interim Fee Application; and (vi) any other information requested by the Court or required by the Local Rules. The Interim Fee Application need not include the narrative discussion generally included in Monthly Fee Applications.
- (g) Objections, if any, to the Interim Fee Application shall be filed and served upon the affected Professional and Notice Parties so as to be received on or before 4:00 p.m. (ET) on the day that is twenty-one (21) days following service of the applicable Interim Fee Application.
- (h) The Debtor may request that the Court schedule a hearing on the Interim Fee Applications at least once every three months, or at such other intervals as the Court deems appropriate. The Court, in its discretion, may approve an uncontested Interim Fee Application without the need for a hearing. Upon allowance by the Court of a Professional's Interim Fee Application, the Debtor shall be authorized to promptly pay such Professional all requested fees (including the 20% holdback) and expenses not previously paid.
- (i) The pendency of an Objection to payment of compensation or reimbursement of expenses will not disqualify a Professional from the future payment of compensation or reimbursement of expenses under the Compensation Procedures. Any Professional that fails to file a Monthly Fee Application or an Interim Fee Application when due or permitted will be ineligible to receive further interim payments of fees or expenses under the Compensation Procedures until such time as a Monthly Fee Application or Interim Fee Application is submitted by the Professional. There will be no other penalties for failing to file a Monthly Fee Application or an Interim Fee Application in a timely manner.
- (j) Any member of a statutorily appointed committee (if any) may submit statements of expense (excluding the fees and expenses of an individual committee member's third-party counsel) and supporting vouchers to the committee's counsel which counsel will collect and submit the committee members' requests for reimbursement in accordance with the Compensation Procedures provided that payment of such expenses is not authorized to the extent that such authorization does not exist under the Bankruptcy Code,

applicable Third Circuit law, the Bankruptcy Rules, the Local Rules, or the procedures and practices of this Court.

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

10. By this Motion, the Debtor further requests that the Court limit the notice of Monthly Fee Applications, Interim Fee Applications, and final fee applications (the “Final Fee Applications,” and, together with the Monthly Fee Applications and Interim Fee Applications, the “Applications”) to the Notice Parties. The Debtor further requests that all other parties that have filed a notice of appearance with the Clerk of the Court and requested notice of pleadings in this Chapter 11 Case be entitled to receive only notice of hearings on the Applications (collectively, the “Hearing Notices”). Providing notice of the Applications in such manner will allow the parties most active in Chapter 11 Case to review and object to professional fees and will save the expense that would be incurred in duplication and mailing costs.

11. The Debtor will include all payments made to Professionals in accordance with the Compensation Procedures in its monthly operating reports, identifying the amount paid to each Professional.

12. The Compensation Procedures proposed herein will enable the Debtor to closely monitor the costs of administration of Chapter 11 Case and implement efficient cost-management procedures. In addition, these proposed Compensation Procedures will allow the Court and the key parties in interest, including the U.S. Trustee, to more efficiently monitor the compensation and reimbursement of Professionals.

RELIEF REQUESTED

13. By this Motion, the Debtor seeks entry of an order, pursuant to sections 105(a) and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1, establishing procedures for interim compensation and reimbursement of expenses of Court-approved Professionals. The Professionals seeking compensation will be required to file fee applications with the Court pursuant to sections 330 and 331 of the Bankruptcy Code on terms that satisfy the requirements of Local Rule 2016-1. Additionally, the Debtor seeks approval of a procedure for reimbursement of reasonable out-of-pocket expenses incurred by members of any statutory committee appointed in this Chapter 11 Case.

14. The Debtor respectfully submits that an order establishing compensation procedures for the Professionals will streamline the compensation process and enable the Court and other parties to monitor more effectively the fees incurred in this Chapter 11 Case.

BASIS FOR RELIEF

15. Section 331 of the Bankruptcy Code provides:

A trustee, an examiner, a debtor's attorney, or any professional person employed under section 327 or 1103 of this title may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered before the date of such an application or reimbursement for expenses incurred before such date as is provided under section 330 of this title. After notice and a hearing, the court may allow and disburse to such applicant such compensation or reimbursement.

11 U.S.C. § 331. Absent an order of this Court, section 331 of the Bankruptcy Code limits payment of fees and expenses to Professionals rendering services in the Chapter 11 Case to only three times per year.

16. Congress's intent in enacting section 331 of the Bankruptcy Code is expressed unequivocally in the House and Senate Reports accompanying enactment of the Bankruptcy Code, which provides:

The court may permit more frequent applications if the circumstances warrant, such as in very large cases where the legal work is extensive and merits more frequent payments. The court is authorized to allow and order disbursement to the applicant of compensation and reimbursement that is otherwise allowable under section 330.

H.R. REP. NO. 595, 95th Cong., 1st Sess. 330 (1977); S. REP. NO. 989, 95th Cong., 2d Sess. 41-42 (1978).

17. Section 105(a) of the Bankruptcy Code provides, in relevant part, that “[t]he 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). Thus, the Court has authority to enter an order authorizing procedures for interim payment of monthly compensation and reimbursement of expenses.

18. The implementation of the Compensation Procedures is justified in this Chapter 11 Case. Absent streamlined Compensation Procedures, the professional fee application and review process would be burdensome on the Debtor, the Professionals, the U.S. Trustee's office, and this Court. The Compensation Procedures suggested herein will enable all parties to closely monitor costs of administration while permitting the Debtor to maintain a more predictable cash flow and an efficient cash management system, as well as to allow Professionals to meet their own cash flow needs during the pendency of Chapter 11 Case and in accordance with Court-approved budgets. The Debtor, therefore, respectfully submits that the relief requested by this Motion is warranted in Chapter 11 Case.

NOTICE

19. Notice of this Motion shall be provided to (a) the U.S. Trustee; (b) the holders of the 20 largest unsecured claims against the Debtor; and (c) all parties who, as of the filing of this Motion, have filed a notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002. The Debtor submits that, in light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

WHEREFORE, the Debtor respectfully requests that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

[Remainder of Page Intentionally Left Blank]

Dated: January 9, 2026,
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

By: /s/ Jason D. Angelo
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*Proposed Counsel for the Debtor and
Debtor in Possession*

EXHIBIT A

Proposed Order

(Attached)

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

In re:	)	
	)	Chapter 11
	)	
GST, INC., ¹	)	Case No. 25-12188 (KBO)
	)	
Debtor.	)	Ref. Docket No. _____
	)	

**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

Upon the Motion² of the above-captioned Debtor for entry of an order establishing procedures for interim compensation and reimbursement of expenses of Professionals, as more fully described in the Motion; and it appearing that the relief requested is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and the Court having jurisdiction to consider the Motion and the relief requested therein 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 consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided under the particular circumstances, and it appearing that no other or further notice need be provided; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

¹ The last four digits of the Debtor's taxpayer identification number are 1002. The Debtor's corporate headquarters and service address is 322 Culver Boulevard, Suite 150, Playa Del Rey, CA 90293.

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

2. Except as may otherwise be provided in an order of the Court authorizing the retention of a particular Professional, the Professionals specifically retained pursuant to an order of the Court in Chapter 11 Case may seek interim payment of compensation and reimbursement of expenses in accordance with the following Compensation Procedures:

- (a) On or after the 20th day of each month following the month for which compensation is sought, each Professional seeking compensation may file a monthly fee application (the “Monthly Fee Application”)³ with the Court and serve a copy of such Monthly Fee Application by electronic mail on each of the following parties:
 - (i) Bankruptcy counsel to the Debtor: (a) Levene, Neale, Bender, Yoo & Golubchik L.L.P., 2818 La Cienega Avenue, Los Angeles, CA 90034; Attn: David L. Neale, Esq. and Krikor J. Meshefejian, Esq., e-mail: DBG@LNBYG.COM and KJM@LNBYG.COM; and (b) Reed Smith LLP, 1201 N. Market Street, Suite 1500, Wilmington, DE 19801, Attn: Kurt F. Gwynne, Esq. and Jason D. Angelo, Esq., e-mail: kgwynne@reedsmith.com and jangelo@reedsmith.com;
 - (ii) Counsel to Winners Alliance, Inc: (a) Raines Feldman Littrell LLP, 1350 Avenue of the Americas, 22nd Floor, New York, NY 10019, Attn: Carollynn H.G. Callari, Esq., email: ccallari@raineslaw.com; and (b) Raines Feldman Littrell LLP, 4675 MacArthur Ct, Suite 1550, Newport Beach, CA 92660; Attn: Hami R. Rafatjoo, Esq., email: hrafatjoo@raineslaw.com;
 - (iii) The Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 Attn: Benjamin Hackman, Esq., e-mail: benjamin.a.hackman@usdoj.gov;
 - (iv) Counsel to any statutory committee appointed in the Chapter 11 Case (collectively with (i), (ii), and (iii), the “Notice Parties”).
- (b) Any Professional that fails to file a Monthly Fee Application for a particular month or months may subsequently submit a consolidated Monthly Fee Application including any prior month or months, which shall comply with the applicable

³ The first Monthly Fee Application is anticipated to cover the period from the Petition Date through December 31, 2025.

provisions of the Bankruptcy Code, the Bankruptcy Rules, and Local Rules, and otherwise governed by these Compensation Procedures.

- (c) Each Notice Party, and all other parties in interest, will have until 4:00 p.m. (prevailing Eastern Time) on the day that is twenty-one (21) days after service of a Monthly Fee Application to object thereto (the “Objection Deadline”). Twenty-four (24) hours after the expiration of the Objection Deadline, each Professional may file a certificate of no objection with the Court, after which the Debtor is authorized and directed to promptly pay the Professional an amount equal to the lesser of (i) 80% of the fees and 100% of the expenses requested in the Monthly Fee Application (the “Maximum Monthly Payment”) or (ii) 80% of the fees and 100% of the expenses requested in the Monthly Fee Application (the “Reduced Monthly Payment”) that are not subject to an Objection (as defined below).
- (d) If any party objects to a Professional’s Monthly Fee Application, the objecting party must file with the Court on or before the Objection Deadline a written objection (the “Objection”) delineating with particularity the reasons for the Objection to any particular time entry or task in question and serve such Objection on the affected Professional and each of the Notice Parties so that such Objection is received on or before the Objection Deadline. Thereafter, the objecting party and the Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within fourteen (14) days after service of the Objection, the Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Monthly Payment and the Reduced Monthly Payment made to the affected Professional (the “Incremental Amount”) or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection, if requested by the parties.
- (e) At three-month intervals (the “Interim Fee Period”), each of the Professionals may file with the Court and serve on the Notice Parties a request (an “Interim Fee Application”) for interim Court approval and allowance of the compensation and reimbursement of expenses sought by such Professional in its Monthly Fee Applications, including any holdbacks, filed during the Interim Fee Period, pursuant to section 331 of the Bankruptcy Code. Each Professional shall file its Interim Fee Application within forty-five (45) days after the end of the Interim Fee Period for which the request seeks allowance of compensation and reimbursement of expenses. The first Interim Fee Application should cover the Interim Fee Period from the Petition Date through and including March 31, 2026.
- (f) The Interim Fee Application must include: (i) the Professional seeking compensation; (ii) the Interim Fee Period; (iii) the amount of compensation and expenses sought; (iv) the amount of fees and expenses paid to date or subject to an Objection; (v) the Objection Deadline applicable to the Interim Fee Application; and (vi) any other information requested by the Court or required by the Local

Rules. The Interim Fee Application need not include the narrative discussion generally included in Monthly Fee Applications.

- (g) Objections, if any, to the Interim Fee Application shall be filed and served upon the affected Professional and Notice Parties so as to be received on or before 4:00 p.m. (ET) on the day that is twenty-one (21) days following service of the applicable Interim Fee Application.
- (h) The Debtor may request that the Court schedule a hearing on the Interim Fee Applications at least once every three months, or at such other intervals as the Court deems appropriate. The Court, in its discretion, may approve an uncontested Interim Fee Application without the need for a hearing. Upon allowance by the Court of a Professional's Interim Fee Application, the Debtor shall be authorized to promptly pay such Professional all requested fees (including the 20% holdback) and expenses not previously paid.
- (i) The pendency of an Objection to payment of compensation or reimbursement of expenses will not disqualify a Professional from the future payment of compensation or reimbursement of expenses under the Compensation Procedures. Any Professional that fails to file a Monthly Fee Application or an Interim Fee Application when due or permitted will be ineligible to receive further interim payments of fees or expenses under the Compensation Procedures until such time as a Monthly Fee Application or Interim Fee Application is submitted by the Professional. There will be no other penalties for failing to file a Monthly Fee Application or an Interim Fee Application in a timely manner.
- (j) Any member of a statutorily appointed committee (if any) may submit statements of expense (excluding the fees and expenses of an individual committee member's third-party counsel) and supporting vouchers to the committee's counsel which counsel will collect and submit the committee members' requests for reimbursement in accordance with the Compensation Procedures provided that payment of such expenses is not authorized to the extent that such authorization does not exist under the Bankruptcy Code, applicable Third Circuit law, the Bankruptcy Rules, the Local Rules, or the procedures and practices of this Court.
- (k) Neither the payment of nor the failure to pay, in whole or in part, monthly interim compensation and reimbursement of expenses under the Compensation Procedures, nor the filing of or failure to file an Objection, will bind any party-in-interest or the Court with respect to the final allowance of applications for compensation and reimbursement of expenses of Professionals. All fees and expenses paid to the Professionals under these Compensation Procedures are subject to disgorgement until final allowance by the Court.

3. The Professionals shall serve the Applications on any party specifically requesting service of the Application and all other parties entitled to notice shall be entitled to receive only the Hearing Notices on the Applications.

4. In each Interim Fee Application and Final Fee Application, each attorney who has been or is hereafter retained pursuant to sections 327 or 1103 of the Bankruptcy Code, unless such attorney is an ordinary course professional, shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Debtor's Chapter 11 Case in compliance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the Local Rules, and any other applicable procedures and orders of the Court.

5. All notices given in accordance with the Compensation Procedures as set forth herein shall be deemed sufficient and adequate notice and in full compliance with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, and Local Rules.

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

7. The Debtor shall serve a copy of this Order on each of the Professionals.

8. The Debtor is authorized and empowered to take all actions necessary to implement the relief granted in this Order.

9. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

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

In re:

GST, INC.,¹

Debtor.

)
) Chapter 11
)

) Case No. 25-12188 (KBO)
)

) **Hearing Date: February 2, 2026 at 11:00 a.m. (ET)**
)

) **Obj. Deadline: January 23, 2026 at 4:00 p.m. (ET)**
)
)

**NOTICE OF HEARING ON DEBTOR'S MOTION FOR ENTRY OF AN
ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

PLEASE TAKE NOTICE that on January 9, 2026, GST, Inc., as debtor and debtor-in-possession (the "Debtor") filed the *Debtor's Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the "Motion").²

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion must be filed with the United States Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **January 23, 2026 at 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the objection upon the undersigned counsel so as to be **received no later than 4:00 p.m. (ET) on January 23, 2026**.

A HEARING ON THE MOTION WILL BE HELD ON **FEBRUARY 2, 2026 AT 11:00 A.M. (ET)** BEFORE THE HONORABLE KAREN B. OWENS, CHIEF UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6th FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

¹ The last four digits of the Debtor's taxpayer identification number are 1002. The Debtor's corporate headquarters and service address is 322 Culver Boulevard, Suite 150, Playa Del Rey, CA 90293.

² Copies of documents filed in the chapter 11 case are available free of charge from the case website maintained at <https://cases.stretto.com/grandslamtrack/>.

Dated: January 9, 2026,
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

By: /s/ Jason D. Angelo
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- and -

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*Proposed Counsel for the Debtor and
Debtor in Possession*