

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
DRF LOGISTICS, LLC, <i>et al.</i> ,	§	Case No. 24-90447 (CML)
	§	
	§	
Debtors. ¹	§	(Jointly Administered)
	§	

**MOTION OF DEBTORS TO ESTABLISH
PROCEDURES FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR PROFESSIONALS**

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT [HTTPS://ECF.TXSB.USCOURTS.GOV/](https://ecf.txsb.uscourts.gov/) WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

DRF Logistics, LLC and DRF, LLC, as debtors and debtors in possession in the above-captioned chapter 11 cases (together, the “**Debtors**”), respectfully represent as follows in support of this motion (the “**Motion**”):

Background

1. On August 8, 2024 (the “**Petition Date**”), the Debtors each commenced with the Court a voluntary case under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”). The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: DRF Logistics, LLC (6861) and DRF, LLC (7236). The Debtors’ mailing address is 7171 Southwest Parkway, Bldg. 300, Suite 400, Austin, TX 78735.

Bankruptcy Code. No trustee or examiner has been appointed in these chapter 11 cases. On August 26, 2024, the United States Trustee for Region 7 (the “**U.S. Trustee**”) appointed an official committee of unsecured creditors (Docket No. 155).

2. The Debtors’ chapter 11 cases are being jointly administered for procedural purposes pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 1015-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Local Rules**”).

3. Additional information regarding the Debtors’ business and capital structure and the circumstances leading to the commencement of these chapter 11 cases is set forth in the *Declaration of Eric Kaup in Support of the Debtors’ Chapter 11 Petitions and First Day Relief* (Docket No. 14) (the “**First Day Declaration**”).²

Jurisdiction

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

Relief Requested

5. By this Motion, pursuant to sections 105(a), 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Bankruptcy Local Rule 2016-1, the Debtors request the Court establish an orderly and regular process for the monthly allowance and payment of compensation and reimbursement of expenses for professionals whose services are authorized by the Court pursuant to section 327 or 1103 of the Bankruptcy Code and who will be required to file

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

applications for allowance of compensation and reimbursement of expenses pursuant to sections 328, 330, and 331 of the Bankruptcy Code and Bankruptcy Rule 2016(a).

6. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A** (the “**Proposed Order**”).

Retention of Professionals

7. Given the size and complex nature of these chapter 11 cases, the Debtors require the assistance of a number of professionals to efficiently manage these proceedings and to successfully wind down their estates. Accordingly, the Debtors have filed separate applications with the Court to employ and retain a number of professionals, including (i) Weil, Gotshal & Manges LLP, as counsel to represent them in these chapter 11 cases, (ii) Triple P RTS, LLC, as restructuring advisor and Triple P Securities, LLC, as investment banker, and (iii) Stretto, Inc., as claims, noticing, and solicitation agent (collectively, the “**Debtors’ Professionals**”). The Debtors may also need to retain additional professionals in connection with the administration of these chapter 11 cases.³

8. The Debtors believe that establishing orderly procedures to pay the Debtors’ Professionals, as well as attorneys and other professionals whose retentions are approved by the Court, including professionals retained by the Creditors’ Committee, and that will be required to file applications for allowance of compensation and reimbursement of expenses (collectively and together with the Debtors’ Professionals, the “**Retained Professionals**”), will streamline the administration of these chapter 11 cases and otherwise promote efficiency for the Court, the U.S. Trustee, and all parties in interest. A streamlined process for serving interim fee applications and

³ Contemporaneously herewith, the Debtors filed a motion pursuant to sections 105(a), 327, 328, 330 of the Bankruptcy Code seeking authority to employ certain professionals used in the ordinary course of business (each, an “**Ordinary Course Professional**”).

notices thereof will facilitate efficient review of the Retained Professionals' fees and expenses while saving the Debtors unnecessary copying and mailing expenses.

Proposed Compensation and Reimbursement Procedures

9. The Debtors propose that the payment of compensation and reimbursement of expenses of Retained Professionals be structured as follows (the “**Interim Compensation Procedures**”):

- (i) On or before the **last day of each month** following the month for which compensation is sought or as soon as is reasonably practicable thereafter, each Retained Professional seeking compensation shall send a monthly statement, reasonably detailed indicating the nature of the services rendered and expenses incurred (the “**Monthly Statement**”), by email to the following parties:
 - (a) the Debtors, c/o DRF Logistics, LLC, Attn: Eric Kaup, Chief Restructuring Officer (ekaup@hilcoglobal.com);
 - (b) proposed counsel for the Debtors, Weil, Gotshal & Manges LLP, Attn: Ray C. Schrock, Esq., Ronit J. Berkovich, Esq., Lauren Tauro, Esq., and Alexander P. Cohen, Esq. (Ray.Schrock@weil.com, Ronit.Berkovich@weil.com, Lauren.Tauro@weil.com, and Alexander.Cohen@weil.com);
 - (c) the U.S. Trustee, Attn: Andrew Jimenez, Esq. and Christopher R. Travis, Esq. (Andrew.Jimenez@usdoj.gov and C.Ross.Travis@usdoj.gov);
 - (d) counsel for the DIP Lender, Gibson, Dunn & Crutcher LLP, Attn: Matthew J. Williams, Esq., C. Lee Wilson, Esq., and Keith R. Martorana, Esq. (MJWilliams@gibsondunn.com, CLWilson@gibsondunn.com, and KMartorana@gibsondunn.com); and
 - (e) proposed counsel for the Creditors' Committee: McDermott Will & Emery LLP, Attn: Charles R. Gibbs, Esq., Marcus Helt, Esq., Natalie Rowles, Esq., and Landon Foody, Esq. (crgibbs@mwe.com, mhelt@mwe.com, nrowles@mwe.com, and lfoody@mwe.com) and Lowenstein Sandler LLP, Attn: David M. Posner, Jeffrey L. Cohen, Gianfranco Finizio, Kelly E. Moynihan, and Erica G. Mannix (DPosner@lowenstein.com, JCohen@lowenstein.com, GFinizio@lowenstein.com, KMoynihan@lowenstein.com, and EMannix@lowenstein.com).

(each, a “**Fee Notice Party**” and, collectively, the “**Fee Notice Parties**”).

Any Retained Professional that fails to submit a Monthly Statement for a particular month or months may subsequently submit a consolidated Monthly Statement that includes a request for compensation earned or expenses incurred during previous months.

- (ii) Each Fee Notice Party shall have 14 days after delivery of a Monthly Statement to review it. Upon expiration of such 14-day period, the Debtors are authorized and directed to pay the Retained Professional an amount (the “**Actual Monthly Payment**”) equal to 80% of the fees and 100% of the expenses requested in the applicable Monthly Statement (the total amount requested being the “**Maximum Monthly Payment**”) that are not subject to an objection pursuant to subparagraph (iii) below.
- (iii) If a Fee Notice Party objects to a Monthly Statement, the objecting party shall, within 14 days after delivery of the Monthly Statement, deliver via email a written notice upon the respective Retained Professional and each of the other Fee Notice Parties (the “**Notice of Objection to Monthly Statement**”) setting forth with reasonable detail the nature of the objection and the amount at issue. Thereafter, the objecting party and the Retained Professional shall attempt to resolve the objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay 80% of the agreed-upon fees and 100% of the agreed-upon expenses. If, however, the parties are unable to reach a resolution of the objection within 14 days after delivery of the Notice of Objection to Monthly Statement, the objecting party shall file its objection (the “**Objection**”) with the Court within three business days and serve such Objection on the respective Retained Professional and each of the other Fee Notice Parties. Thereafter, the Retained Professional may either (i) file with the Court a response to the Objection, together with a request for payment of the amount in dispute pursuant to the Objection (the “**Disputed Amount**”) or (ii) forego payment of the Disputed Amount until the next hearing on an Interim Fee Application or Final Fee Application (each as defined herein), at which time the Court will consider the Objection, if requested by the parties.
- (iv) Beginning with the period ending October 31, 2024, and at three-month intervals thereafter (each, an “**Interim Fee Period**”), each of the Retained Professionals shall file with the Court and serve on the Fee Notice Parties an interim fee application (each, an “**Interim Fee Application**”) for payment of compensation and reimbursement of expenses sought in the Monthly Statements served during such Interim Fee Period and prepared in accordance with the Interim Compensation Procedures. Each Interim Fee Application shall consist of (i) the Complex Case Fee Application Case Coversheet, the form of which is located on the Court’s website, (ii) a copy of the invoices for the interim

application period (if hourly) or a calculation of the fee due for the Interim Fee Period (if non-hourly), unless already included in the applicable Monthly Statements, (iii) an itemized list of expenses for which reimbursement is requested (if not contained in the copies of the invoices), unless already included in the applicable Monthly Statements, (iv) a narrative discussion, (v) a summary of the Monthly Fee Statements that are the subject of such Interim Fee Application, (vi) the amount of fees and expenses paid to date or subject to objection, (vii) the deadline for parties to file objections, and (viii) a proposed order in the form located on the Court's website. Fee Notice Parties shall have 21 days after service of an Interim Fee Application, which service may be by email, to object thereto. The first Interim Fee Application shall cover the Interim Fee Period from the Petition Date through and including October 31, 2024. Notwithstanding anything to the contrary in the Interim Compensation Procedures, a Retained Professional may file a fee application in accordance with any procedures established by a chapter 11 plan filed in these cases and confirmed by the Court.

- (v) Retained Professionals shall file their Interim Fee Applications on or before the 45th day, or the next business day if such day is not a business day, following the end of each Interim Fee Period; *provided, however*, that the failure to file an Interim Fee Application on such date shall not be the basis for objection to or disallowance of the fees and expenses of any Retained Professional.
- (vi) The Debtors will request that the Court consider the Interim Fee Applications 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 if no Objections are timely filed. Upon allowance by the Court of a Retained Professional's Interim Fee Application, the Debtors shall be authorized to promptly pay such Retained Professional all requested fees (including the 20% holdback) and expenses not previously paid.
- (vii) The pendency of an Objection to payment of compensation or reimbursement of expenses will not disqualify a Retained Professional from the future payment of compensation or reimbursement of expenses under these Interim Compensation Procedures, unless otherwise ordered by the Court.

10. The Debtors request that the Court limit service of Monthly Fee Statements, Interim Fee Applications, and final fee applications (each, a "**Final Fee Application**" and, together with the Interim Fee Applications, the "**Applications**") to the Fee Notice Parties. The Debtors

further request that all other parties that have filed a notice of appearance and requested notice of pleadings in these chapter 11 cases shall be entitled to receive only notice of hearings on the Applications (the “**Hearing Notices**”). Serving the Applications and the Hearing Notices in this manner will permit the parties most active in these chapter 11 cases to review and object to the Retained Professionals’ fees and will save unnecessary duplications and mailing expenses.

Relief Requested Should be Granted

11. Pursuant to section 331 of the Bankruptcy Code, all Retained Professionals are entitled to submit applications for interim compensation and reimbursement of expenses every 120 days, or more often if the Court permits. Section 331 of the Bankruptcy Code provides in relevant part as follows:

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.

11 U.S.C. § 331. Section 105(a) of the Bankruptcy Code authorizes the Court to issue any order “that is necessary or appropriate to carry out the provisions” of the Bankruptcy Code. *Id.* § 105(a). Thus, the Court has ample authority to enter an order authorizing the Interim Compensation Procedures requested herein.

12. The proposed Interim Compensation Procedures would enable the Debtors to monitor closely the costs of administration, forecast cash flows, and implement efficient cash management procedures. They would also allow the Court and key parties in interest, including the U.S. Trustee, to ensure the reasonableness and necessity of the compensation and reimbursement requested.

13. For the foregoing reasons, the relief requested is appropriate and in the best interests of the Debtors, their estates, and all other parties in interest in these chapter 11 cases.

Notice

14. Notice of this Motion will be served on any party entitled to notice pursuant to Bankruptcy Rule 2002 and any other party entitled to notice pursuant to Bankruptcy Local Rule 9013-1(d).

WHEREFORE the Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: September 14, 2024
Houston, Texas

/s/ Gabriel A. Morgan
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-and-

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*Proposed Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on September 14, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Gabriel A. Morgan
Gabriel A. Morgan

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: DRF LOGISTICS, LLC, <i>et al.</i>, Debtors.¹	§ § § § § § § §	Chapter 11 Case No. 24-90447 (CML) (Jointly Administered) Re: Docket No. ____
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**ORDER ESTABLISHING PROCEDURES FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR PROFESSIONALS**

Upon the motion, dated September 13, 2024 (the “**Motion**”)² of DRF Logistics, LLC, and DRF, LLC, as debtors and debtors in possession in the above-captioned chapter 11 cases (together, the “**Debtors**”), for entry of an order pursuant to sections 105(a), 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Bankruptcy Local Rule 2016-1, to establish the Interim Compensation Procedures for Retained Professionals, all as more fully set forth in the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and upon any hearing held on the Motion; and all objections, if any, to the Motion have been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth

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

in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtors and their respective estates and creditors; 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. Except as may otherwise be provided by orders of this Court authorizing the retention of specific professionals, all Retained Professionals, and members of any statutory committee of creditors may seek interim compensation and/or reimbursement of expenses in accordance with the following Interim Compensation Procedures:

- (i) On or before the **last day of each month** following the month for which compensation is sought or as soon as is reasonably practicable thereafter, each Retained Professional seeking compensation shall send a monthly statement, reasonably detailed indicating the nature of the services rendered and expenses incurred (the “**Monthly Statement**”), by email to the following parties:
 - (a) the Debtors, c/o DRF Logistics, LLC, Attn: Eric Kaup, Chief Restructuring Officer (ekaup@hilcoglobal.com);
 - (b) proposed counsel for the Debtors, Weil, Gotshal & Manges LLP, Attn: Ray C. Schrock, Esq., Ronit J. Berkovich, Esq., Lauren Tauro, Esq., and Alexander P. Cohen, Esq. (Ray.Schrock@weil.com, Ronit.Berkovich@weil.com, Lauren.Tauro@weil.com, and Alexander.Cohen@weil.com);
 - (c) the U.S. Trustee, Attn: Andrew Jimenez, Esq. and Christopher R. Travis, Esq. (Andrew.Jimenez@usdoj.gov and C.Ross.Travis@usdoj.gov);
 - (d) counsel for the DIP Lender, Gibson, Dunn & Crutcher LLP, Attn: Matthew J. Williams, Esq., C. Lee Wilson, Esq., and Keith R. Martorana, Esq. (MJWilliams@gibsondunn.com, CLWilson@gibsondunn.com, and KMartorana@gibsondunn.com); and
 - (e) proposed counsel for the Creditors’ Committee: McDermott Will & Emery LLP, Attn: Charles R. Gibbs, Esq., Marcus Helt, Esq., Natalie Rowles, Esq., and Landon Foody, Esq. (crgibbs@mwe.com, mhelt@mwe.com, nrowles@mwe.com, and lfoody@mwe.com) and Lowenstein Sandler LLP, Attn:

David M. Posner, Jeffrey L. Cohen, Gianfranco Finizio, Kelly E. Moynihan, and Erica G. Mannix (DPosner@lowenstein.com, JCohen@lowenstein.com, GFinizio@lowenstein.com, KMoynihan@lowenstein.com, and EMannix@lowenstein.com).

(each, a “**Fee Notice Party**” and, collectively, the “**Fee Notice Parties**”).

Any Retained Professional that fails to submit a Monthly Statement for a particular month or months may subsequently submit a consolidated Monthly Statement that includes a request for compensation earned or expenses incurred during previous months.

- (ii) Each Fee Notice Party shall have 14 days after delivery of a Monthly Statement to review it. Upon expiration of such 14-day period, the Debtors are authorized and directed to pay the Retained Professional an amount (the “**Actual Monthly Payment**”) equal to 80% of the fees and 100% of the expenses requested in the applicable Monthly Statement (the total amount requested being the “**Maximum Monthly Payment**”) that are not subject to an objection pursuant to subparagraph (iii) below.
- (iii) If a Fee Notice Party objects to a Monthly Statement, the objecting party shall, within 14 days after delivery of the Monthly Statement, deliver via email a written notice upon the respective Retained Professional and each of the other Fee Notice Parties (the “**Notice of Objection to Monthly Statement**”) setting forth with reasonable detail the nature of the objection and the amount at issue. Thereafter, the objecting party and the Retained Professional shall attempt to resolve the objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay 80% of the agreed-upon fees and 100% of the agreed-upon expenses. If, however, the parties are unable to reach a resolution of the objection within 14 days after delivery of the Notice of Objection to Monthly Statement, the objecting party shall file its objection (the “**Objection**”) with this Court within three business days and serve such Objection on the respective Retained Professional and each of the other Fee Notice Parties. Thereafter, the Retained Professional may either (i) file with this Court a response to the Objection, together with a request for payment of the amount in dispute pursuant to the Objection (the “**Disputed Amount**”) or (ii) forego payment of the Disputed Amount until the next hearing on an Interim Fee Application or Final Fee Application (each as defined herein), at which time this Court will consider the Objection, if requested by the parties.
- (iv) Beginning with the period ending October 31, 2024, and at three-month intervals thereafter (each, an “**Interim Fee Period**”), each of the Retained Professionals shall file with the Court and serve on the Fee Notice Parties an interim fee application (each, an “**Interim Fee Application**”) for payment of compensation and reimbursement of

expenses sought in the Monthly Statements served during such Interim Fee Period and prepared in accordance with the Interim Compensation Procedures. Each Interim Fee Application shall consist of (i) the Complex Case Fee Application Case Coversheet, the form of which is located on the Court's website, (ii) a copy of the invoices for the interim application period (if hourly) or a calculation of the fee due for the Interim Fee Period (if non-hourly), unless already included in the applicable Monthly Statements, (iii) an itemized list of expenses for which reimbursement is requested (if not contained in the copies of the invoices), unless already included in the applicable Monthly Statements, (iv) a narrative discussion, (v) a summary of the Monthly Fee Statements that are the subject of such Interim Fee Application, (vi) the amount of fees and expenses paid to date or subject to objection, (vii) the deadline for parties to file objections, and (viii) a proposed order in the form located on the Court's website. Fee Notice Parties shall have 21 days after service of an Interim Fee Application, which service may be by email, to object thereto. The first Interim Fee Application shall cover the Interim Fee Period from the Petition Date through and including October 31, 2024. Notwithstanding anything to the contrary in the Interim Compensation Procedures, a Retained Professional may file a fee application in accordance with any procedures established by a chapter 11 plan filed in these cases and confirmed by the Court.

- (v) Retained Professionals shall file their Interim Fee Applications on or before the 45th day, or the next business day if such day is not a business day, following the end of each Interim Fee Period; *provided, however*, that the failure to file an Interim Fee Application on such date shall not be the basis for objection to or disallowance of the fees and expenses of any Retained Professional.
- (vi) The Debtors will request that this Court consider the Interim Fee Applications once every three months or at such other intervals as this Court deems appropriate. This Court, in its discretion, may approve an uncontested Interim Fee Application without the need for a hearing if no Objections are timely filed. Upon allowance by this Court of a Retained Professional's Interim Fee Application, the Debtors shall be authorized to promptly pay such Retained Professional all requested fees (including the 20% holdback) and expenses not previously paid.
- (vii) The pendency of an Objection to payment of compensation or reimbursement of expenses will not disqualify a Retained Professional from the future payment of compensation or reimbursement of expenses under these Interim Compensation Procedures, unless otherwise ordered by this Court.

2. Neither (i) the payment of or the failure to pay, in whole or in part, a Monthly Statement nor (ii) the filing of or failure to file an Objection with this Court will bind any party in interest or this Court with respect to the Final Fee Applications. All fees and expenses paid to Retained Professionals under the Interim Compensation Procedures are subject to challenge and disgorgement until final allowance by this Court.

3. In each Interim Fee Application and the Final Fee Application, all attorneys that have been or are hereafter retained pursuant to sections 327 or 1103 of the Bankruptcy Code, unless such attorney is an Ordinary Course Professional retained by the Debtors, shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Debtors' chapter 11 cases in compliance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, Local Rules, and any other applicable procedures and orders of this Court.

4. A Retained Professional shall not seek payment in a Final Fee Application for any amounts that such Retained Professional previously sought in a Monthly Fee Statement or Interim Fee Application, and which such Retained Professional voluntarily waived or reduced to resolve formal or informal objections or were disallowed by order of this Court.

5. The Retained Professionals shall serve the Monthly Statements, the Interim Fee Applications, and the Final Fee Applications on the Fee Notice Parties only and shall provide notice of hearings on the Interim Fee Applications and Final Fee Applications on all other parties that have filed a notice of appearance with the Clerk of this Court and requested notice of pleadings in these chapter 11 cases.

6. All notices given in accordance with the Interim Compensation Procedures shall be deemed sufficient and adequate notice and in full compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Bankruptcy Local Rules.

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

8. The Debtors are authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.

9. This Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2024
Houston, Texas

CHRISTOPHER LOPEZ
UNITED STATES BANKRUPTCY JUDGE