

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

In re:

CASA PROPERTIES LLC,¹

Debtor.

Chapter 11

Case No. 24-10697 (KBO)

Ref. Docket Nos: 29, 30, 31, 32, 33, 36 & 37

**CERTIFICATION OF COUNSEL REGARDING PROPOSED OMNIBUS ORDER
APPROVING FINAL FEE APPLICATIONS OF PROFESSIONALS FOR THE
FINAL PERIOD FROM APRIL 3, 2024 THROUGH JUNE 5, 2024**

On or before July 22, 2024, the professionals retained in these chapter 11 cases by the above captioned debtor and debtor in possession (the “Debtor”) and the Official Committee of Unsecured Creditors (the “Committee” and together with the Debtor, the “Professionals”) filed their respective applications for final allowance of compensation and reimbursement of expenses [Docket Nos. 29, 30, 31, 32, 33, 36, and 37] (collectively, the “Final Fee Applications”). Final Fee Applications were filed by the following Professionals:

- Sidley Austin LLP (“Sidley”)
- Young Conaway Stargatt & Taylor, LLP (“Young Conaway”)
- Alvarez & Marsal North America, LLC (“A&M”)
- Ducera Partners LLC (“Ducera”)
- Epiq Corporate Restructuring, LLC
- McDermott Will & Emery LLP (“McDermott Will”)
- Province, LLC

¹ The Debtor in this chapter 11 case, together with the last four digits of the Debtor’s federal tax identification number, is Casa Properties LLC (6767). The Debtor’s service address is Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

Objections, if any, to the Final Fee Applications were required to be filed and served on or before August 12, 2024, at 4:00 p.m. (ET) (the “Objection Deadline”) at the latest, and earlier for certain Professionals. The Office of the United States Trustee (The “U.S. Trustee”) provided informal comments to the Final Fee Applications of Sidley, Young Conaway, A&M, Ducera, and McDermott Will (the “UST Informal Comments”). The undersigned hereby certifies, as of the date hereof, that no other answer, objection, or other responsive pleading to the Final Fee Applications has been received, and that he has reviewed the docket in these chapter 11 cases and no answer, objection, or other responsive pleading to the Final Fee Applications appear thereon.

Attached hereto as **Exhibit 1** is a proposed form of order (the “Proposed Order”) approving, on a final basis, the Final Fee Applications. The Proposed Order resolves the UST Informal Comments. The U.S. Trustee has reviewed the Proposed Order and does not object to its entry. The Debtor respectfully requests the Court to enter the Proposed Order at its earliest convenience without further notice or a hearing.

[Signature Page Follows]

Dated: August 19, 2024
Wilmington, Delaware

/s/ Joseph M. Mulvihill

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Co-Counsel to the Plan Administrator

EXHIBIT 1

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

In re:

CASA PROPERTIES LLC,¹

Debtor.

Chapter 11

Case No. 24-10697 (KBO)

Ref. Docket Nos: 29, 30, 31, 32, 33, 36 & 37

**OMNIBUS ORDER APPROVING FINAL FEE APPLICATIONS
OF PROFESSIONALS FOR THE FINAL PERIOD FROM
APRIL 3, 2024 THROUGH AND INCLUDING JUNE 5, 2024**

Upon consideration of the final fee applications (collectively, the “Final Fee Applications”) of professionals identified on **Exhibit A** hereto (the “Professionals”) retained in these chapter 11 cases by the above-captioned debtors and debtors in possession (the “Debtors”) and the Official Committee of Unsecured Creditors (the “Committee”), for allowance of compensation and reimbursement of expenses, on a final basis, and it appearing to this Court that all of the requirements of sections 327, 328, 330, 331, and 503(b) of title 11 of the United States Code, as well as Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, have been satisfied; and it further appearing that the expenses incurred were reasonable and necessary; and that notice of the Final Fee Applications was appropriate; and after due deliberation and sufficient good cause appearing therefor; it is hereby:

ORDERED, that the Final Fee Applications are hereby APPROVED, on a final basis, in the amounts set forth on **Exhibit A** attached hereto; and it is further

¹ The Debtor in this chapter 11 case, together with the last four digits of the Debtor’s federal tax identification number, is Casa Properties LLC (6767). The Debtor’s service address is Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

ORDERED, that the Professionals are granted final allowance of compensation in the amounts set forth on **Exhibit A** attached hereto; and it is further

ORDERED, that the Professionals are granted, on a final basis, reimbursement of expenses in the amounts set forth on **Exhibit A** attached hereto; and it is further

ORDERED, that the Debtors are authorized and directed, as provided herein, to remit, or cause to be remitted, payment in the amounts set forth on **Exhibit A** attached hereto, less any and all amounts previously paid on account of such fees and expenses; and it is further

ORDERED, that this shall be deemed a separate order for each Professional and the appeal of any order with respect to any Professional shall have no effect on the authorized fees and expenses of another Professional

ORDERED, that this Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

EXHIBIT A

PROFESSIONAL	FEES	EXPENSES
Sidley Austin LLP <i>Co-Counsel to the Debtors</i> 4/3/24 – 6/5/24	\$4,631,873.00 ¹	\$47,302.22
Young Conaway Stargatt & Taylor, LLP <i>Co-Counsel to the Debtors</i> 4/3/24 – 6/5/24	\$407,745.50 ²	\$15,988.31
Ducera Partners LLC <i>Investment Banker to the Debtors</i> 4/3/24 – 6/5/24	\$2,682,916.66	\$28,831.52 ³
Alvarez & Marsal North America, LLC <i>Financial Advisor to the Debtors</i> 4/3/24 – 6/5/24	\$1,225,132.20 ⁴	\$6,537.14
Epiq Corporate Restructuring, LLC <i>Claims and Noticing Agent for the Debtors</i> 4/3/24 – 6/5/24	\$17,901.50	\$0.00
McDermott Will & Emery LLP <i>Counsel to the Official Committee of Unsecured Creditors</i> 4/17/24 – 6/5/24	\$1,605,784.00 ⁵	\$8,332.93
Province, LLC <i>Financial Advisor to the Official Committee of Unsecured Creditors</i> 4/18/24 – 6/5/24	\$423,090.00	\$116.13

¹ This amount reflects a reduction in the amount of \$10,141.00 per agreement with the U.S. Trustee.

² This amount reflects a reduction in the amount of \$563.50 per agreement with the U.S. Trustee.

³ This amount reflects a reduction in the amount of \$710.02 per agreement with the U.S. Trustee.

⁴ This amount reflects a reduction in the amount of \$117.80 per agreement with the U.S. Trustee.

⁵ This amount reflects a reduction in the amount of \$4,125.00 per agreement with the U.S. Trustee.