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

In re:	Chapter 11
LURIN REAL ESTATE HOLDINGS XXI, LLC, *et al.*,[1]	Case No. 26-90344 (ARP)
Debtors.	(Jointly Administered)

APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO RETAIN AND EMPLOY PACHULSKI STANG ZIEHL & JONES LLP AS COUNSEL EFFECTIVE AS OF MAY 7, 2026

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/ 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.

The Official Committee of Unsecured Creditors (the "Committee") of Lurin Real Estate Holdings XXI, LLC, *et al.* and its affiliated debtors (collectively, the "Debtors") hereby submits its application (this "Application"), pursuant to sections 328 and 1103 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the "Bankruptcy Code"), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rules 2014-1 and 2016-1 of the *Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas* (the "Bankruptcy Local Rules"), for entry of an order authorizing and approving the employment of Pachulski Stang Ziehl & Jones LLP ("PSZJ" or the "Firm") as counsel to the

[1] A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at https://restructuring.ra.kroll.com/Lurin/Home-Index. The location of the Debtors' service address is: 2101 Cedar Springs, Suite 1050, Dallas, TX 75201.

Committee in connection with the Debtors' jointly-administered chapter 11 cases (the "Chapter 11 Cases"), effective as of May 7, 2026. In support of this Application, the Committee submits the declaration of Bradford J. Sandler (the "Sandler Declaration"), a partner of the Firm, attached hereto as **Exhibit B** and incorporated herein by reference, and the declaration of Joshua Malone, the Chair of the Committee (the "Malone Declaration" and, together with the Sandler Declaration, the "Declarations"), attached hereto as **Exhibit C** and incorporated herein by reference. In further support of the Application, the Committee respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this Application pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

2. Venue of this proceeding and this Application is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 328 and 1103(a) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, Bankruptcy Local Rules 2014-1 and 2016-1, and Section R of the *Procedures for Complex Cases in the Southern District of Texas* (the "Complex Case Procedures").

BACKGROUND

4. On March 2 and 5, 2026 (the "Round 1 Petition Date"), the Round 1 Debtors[2] each commenced voluntary cases under chapter 11 of the Bankruptcy Code in this Court. On

[2] The Round 1 Debtors are: Lurin Real Estate Holdings XXI, LLC, Lurin Real Estate Holdings XXVIII, LLC, and Lurin Real Estate Holdings XXXIII, LLC.

March 20 and 30, 2026 (the "Round 2 Petition Date"), the Round 2 Debtors[3] each commenced voluntary cases under chapter 11 of the Bankruptcy Code in this Court. On April 8, 10, and 14 2026 (the "Round 3 Petition Date"), the Round 3 Debtors[4] each commenced voluntary cases under chapter 11 of the Bankruptcy Code in this Court. On April 21, 2026 (the "Round 4 Petition Date"), the Round 4 Debtors[5] each commenced voluntary cases under chapter 11 of the Bankruptcy Code in this Court. On May 28, 2026 (the "Round 5 Petition Date" and with Rounds 1 through 4 Petition Dates, the "Petition Date"), the Round 5 Debtors[6] each commenced voluntary cases under chapter 11 of the Bankruptcy Code in this Court.

5. The Debtors are authorized to continue operating their businesses and managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Debtors' Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and Bankruptcy Local Rule 1015-1. *See* Docket Nos. 26, 68, 87, 158, 274, and 362. No trustee or examiner has been appointed in these Chapter 11 Cases.

6. On May 5, 2026, the Office of the United States Trustee (the "U.S. Trustee") appointed the Committee pursuant to section 1102 of the Bankruptcy Code. The Committee consists of the following three (3) members, as may be reconstituted from time to time: (i) Joshua Malone; (ii) South Texas Plumbing; and (iii) Southland Property Tax Consultants, Inc. *See* Docket No. 265.

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[3] The Round 2 Debtors are: Lurin Real Estate Holdings LXV, LLC, Lurin Real Estate Holdings XXXVIII, LLC, and Lurin Real Estate Holdings XI, LLC.

[4] The Round 3 Debtors are: Lurin, LLC, Lurin Advisors, LLC, Lurin Real Estate Holdings LXIV, LLC, Lurin Equity Partners XL, LLC, Lurin Equity Partners XLI, LLC, Lurin Equity Partners XLIII, LLC, and Lurin Equity Partners XXXIV, LLC.

[5] The Round 4 Debtors are: Lurin Real Estate Holdings XXII, LLC and Lurin Real Estate Holdings XXVI, LLC.

[6] The Round 5 Debtors are: Lurin Real Estate Holdings XXIV, LLC and Lurin Real Estate Holdings XXV, LLC.

7. On May 7, 2026, the Committee held a meeting and, among other things, voted to retain PSZJ as its counsel, and to retain Province as its financial advisor, subject to this Court's approval.

8. PSZJ's retention is requested as of May 7, 2026, insofar as that is the date the Committee first requested the Firm to render legal services on behalf of the Committee, and PSZJ has been actively advising the Committee since that date.

RELIEF REQUESTED

9. By this Application, the Committee respectfully requests that the Court enter an order, substantially in the form annexed hereto as **Exhibit A** (the "Proposed Order"), pursuant to sections 328 and 1103(a) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, Bankruptcy Local Rules 2014-1 and 2016-1, and Section R of the Complex Case Procedures, authorizing the Committee to employ and retain PSZJ as its counsel in these Chapter 11 Cases, effective as of May 7, 2026.

10. The Committee seeks to retain PSZJ effective as of May 7, 2026 because the Firm began providing services to the Committee as of such date. The Committee believes that such retention is appropriate in these Chapter 11 Cases because the Committee required effective representation immediately upon its appointment, and PSZJ has been providing services to the Committee since May 7, 2026.

PSZJ'S QUALIFICATIONS AND SERVICES TO BE RENDERED

11. The Committee seeks to retain PSZJ as counsel because of the Firm's extensive expertise and knowledge in the field of debtors' and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code. PSZJ has approximately eighty-five (85) attorneys with a practice concentrated on corporate reorganizations, bankruptcy, litigation,

and commercial matters. The Firm's attorneys have comprehensive experience representing creditors' committees, debtors, creditors, trustees, and others in a wide variety of bankruptcy cases. Attorneys of the Firm have extensive experience representing creditors' committees in complex chapter 11 cases in this district and throughout the country, including in the cases of *Axip Energy Services, LP, Pine Gate Renewables, LLC*, *Worldwide Machinery Group, Inc., Conn's, Inc.*, *Hornblower Holdings LLC*, *Surgalign Holdings, Inc.*, *Party City Holdco Inc.*, *Cineworld Group plc*, *Altera Infrastructure LP*, *Talen Energy Supply, LLC*, *Sungard AS New Holdings, LLC*, *Agilon Energy Services*, *Limetree Bay Services*, *Tailored Brands*, *Neiman Marcus Group*, *Whiting Petroleum*, *Cobalt Energy*, *Erin Energy*, *Ignite Restaurants*, *Rockall Energy Holdings*, *Spherature Investments*, *Studio Movie Grill*, *Rita Restaurants*, and *Reddy Ice*. Based on these facts, the Committee believes that the Firm is well-qualified to render the services described below.

12. The Committee submits that it is necessary and appropriate for it to employ and retain the Firm to provide, among other things, the following services as may be requested by the Committee and its other professionals:

a. advise the Committee with respect to its rights, duties, and powers in these Chapter 11 Cases;

b. assist and advise the Committee in its consultations with the Debtors relative to the administration of these Chapter 11 Cases;

c. assist the Committee in analyzing the claims of the Debtors' creditors and the Debtors' capital structure and in negotiating with holders of claims;

d. assist the Committee in its investigation of the acts, conduct, assets, liabilities, and financial condition of the Debtors and of the operation of the Debtors' businesses;

e. assist the Committee in its investigation of, *inter alia*, the liens and claims of the Debtors' lenders and the prosecution of any claims or causes of action revealed by such investigation;

f. assist the Committee in its analysis of, and negotiations with, the Debtors or any third-party concerning matters related to, among other things, the assumption or rejection of leases of nonresidential real property and executory contracts, asset dispositions, financing or other transactions, and the terms of one or more plans of reorganization for the Debtors and accompanying disclosure statements and related plan documents;

g. assist and advise the Committee in communicating with unsecured creditors regarding significant matters in these Chapter 11 Cases;

h. represent the Committee at hearings and other proceedings;

i. review and analyze applications, orders, statements of operations, and schedules filed with the Court and advise the Committee as to their propriety;

j. assist the Committee in preparing pleadings and applications as may be necessary in furtherance of the Committee's interests and objectives;

k. prepare, on behalf of the Committee, any pleadings, including without limitation, motions, memoranda, complaints, adversary complaints, objections or comments in connection with any of the foregoing; and

l. perform such other legal services as may be required or requested or as may otherwise be deemed in the interests of the Committee in accordance with the Committee's powers and duties as set forth in the Bankruptcy Code, Bankruptcy Rules or other applicable law.

13. PSZJ will coordinate closely with Province to minimize the duplication of the services provided to the Committee by each such professional and meet the scope of the services that each firm is retained to provide.

NO ADVERSE INTEREST AND DISCLOSURES REGARDING CONNECTIONS

14. The Committee believes that PSZJ does not hold or represent any interest that is adverse to the Committee and the Debtors' estates and does not hold or represent any interest adverse to and has no connection with the Committee, the Debtors, the Debtors' creditors, or any party in interest herein in the matters upon which PSZJ is to be retained, except as set forth in the Sandler Declaration and subject to PSZJ's ongoing conflicts review.

15. To the best of the Committee's knowledge, and based upon the Sandler Declaration attached hereto, neither the Firm nor any of its attorneys have any connection with any party in interest, their attorneys or accountants, other than as set forth in the Sandler Declaration.

16. To the best of the Committee's knowledge, except as provided in the Sandler Declaration, neither the Firm, nor any of its attorneys represent any interest adverse to that of the Committee in the matters on which they are to be retained.

17. The Committee submits that its proposed employment of PSZJ is in the best interests of the Committee and its members.

18. While the Firm has undertaken, and continues to undertake, efforts to identify connections with the Debtors and other parties in interest, it is possible that connections with some parties in interest have not yet been identified. Should the Firm, through its continuing efforts or as these Chapter 11 Cases progress, learn of any new connections of the nature described above, the Firm will promptly file supplemental declarations, as required by Bankruptcy Rule 2014(a).

19. PSZJ represents many debtors and creditors' committees in other bankruptcy cases, and those debtors, the members of those committees, or those estates may be creditors of the Debtors. However, the Firm will not represent any those debtors, creditors' committees, or their members with respect to any claims that they may have collectively or individually against the Debtors.

20. Similarly, PSZJ may represent, or may have represented, debtors, creditors' committees, or trustees in cases or proceedings against creditors of the Debtors that are unrelated to these Chapter 11 Cases.

PROFESSIONAL COMPENSATION

21. Subject to Court approval and in accordance with section 330(a) of the Bankruptcy Code and any applicable orders of this Court, compensation will be payable to PSZJ on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by the Firm. PSZJ's current standard hourly rates are:

Partners	$1,150 - $2,695 per hour
Of Counsel	$1,175 - $2,050 per hour
Associates	$725 - $1,350 per hour
Paraprofessionals	$625 - $695 per hour

22. The hourly rates set forth above are subject to periodic adjustments, including in January 2027, to reflect economic and other conditions, and such changes will be noticed in accordance with the Bankruptcy Local Rules and/or practice.

23. The hourly rates set forth above are the Firm's current standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate the Firm for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. It is the Firm's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, telephone and telecopier toll and other charges, mail and express mail charges, special or hand delivery charges, document retrieval, photocopying charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by the Firm to outside copying services for use in mass mailings, expenses for "working meals," computerized research, transcription costs, as well as non-ordinary overhead expenses such as secretarial and other overtime. The Firm will charge the Committee for these expenses in a manner and at rates consistent with charges made generally to the Firm's other clients and within the guidelines set forth in Bankruptcy Local Rules 2014-1 and 2016-1, and all amendments and supplemental

standing orders of the Court. The Firm believes that it is more appropriate to charge these expenses to the clients incurring them than to increase the hourly rates and spread the expenses among all clients.

NOTICE

24. The Committee will provide notice of this Application to: (i) the U.S. Trustee, (ii) counsel to the Debtors, and (iii) all parties listed on the Debtors' Master Service List. In light of the nature of the relief requested, the Committee submits that no other or further notice need be given.

NO PRIOR REQUEST

25. No previous request for the relief sought herein has been made to this or any other Court.

WHEREFORE, the Committee respectfully requests the entry of an order, substantially in the form of the Proposed Order attached hereto, authorizing the Committee to employ and retain PSZJ as counsel, effective as of May 7, 2026, and granting such other and further relief as is just and proper.

Dated: June 8, 2026

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF LURIN REAL ESTATE HOLDINGS XXI, LLC, *ET AL.*

By: */s/ Joshua Malone*
Joshua Malone, solely in their capacity as Chair of the Official Committee of Unsecured Creditors of Lurin Real Estate Holdings XXI, LLC, *et al.*, and not in any other capacity

Exhibit A

Proposed Order

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

In re:	Chapter 11
LURIN REAL ESTATE HOLDINGS XXI, LLC, *et al.*,[1]	Case No. 26-90344 (ARP)
Debtors.	(Jointly Administered)

ORDER AUTHORIZING AND APPROVING THE RETENTION AND EMPLOYMENT OF PACHULSKI STANG ZIEHL & JONES LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF THE DEBTORS EFFECTIVE AS OF MAY 7, 2026

Upon consideration of the application (the "Application")[2] of the Official Committee of Unsecured Creditors (the "Committee"), pursuant to sections 328 and 1103(a) of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the "Bankruptcy Code"), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rules 2014-1 and 2016-1 of the *Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas* (the "Bankruptcy Local Rules"), for entry of an order authorizing and approving the retention and employment of Pachulski Stang Ziehl & Jones LLP ("PSZJ" or the "Firm") as co-counsel for the Committee in the chapter 11 cases (the "Chapter 11 Cases") of the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), as more fully described in the Application; and upon consideration of the Sandler Declaration and the Malone Declaration, each submitted in support of the Application and annexed thereto as Exhibit B and Exhibit C, respectively; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance with 28 U.S.C. § 1334; and consideration of the

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1 A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at https://restructuring.ra.kroll.com/Lurin/Home-Index. The location of the Debtors' service address is: 2101 Cedar Springs, Suite 1050, Dallas, TX 75201.

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

Application 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 it appearing that the relief requested in the Application is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Committee having provided adequate and appropriate notice of the Application under the circumstances; and after due deliberation and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. Pursuant to sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Bankruptcy Local Rules 2014-1 and 2016-1, the Committee is hereby authorized to retain and employ PSZJ as counsel to the Committee, effective as of May 7, 2026, as set forth in this Order.

2. PSZJ shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Debtors' Chapter 11 Cases as set forth in the Application and Sandler Declaration, and in compliance with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and any other applicable procedures and orders of this Court. For billing purposes, the Firm shall keep its time in one tenth (1/10) hour increments.

3. Notwithstanding anything to the contrary in the Application or the Declarations attached to the Application, the Firm shall not be entitled to reimbursement for fees and expenses in connection with any objection to its fees, without further order of the Court.

4. PSZJ shall provide ten (10) business days' notice to the Committee, the Debtors, and the U.S. Trustee, which notice shall be filed with the Court, prior to filing and/or serving a fee statement or fee application reflecting such an increase. The U.S. Trustee shall retain the right to object to any rate increase on any and all grounds, including under the reasonableness standard

set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

5. The Committee and PSZJ are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

6. The Firm shall use its reasonable efforts, and coordinate with the Committee and their other retained professionals, to avoid any duplication of services provided by any of the Committee's other retained professionals in these Chapter 11 Cases.

7. The Firm will review its files periodically during the pendency of these Chapter 11 Cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, the Firm will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

8. To the extent the Application, the Sandler Declaration, or the Malone Declaration is inconsistent with this Order, the terms of this Order shall govern.

9. The Firm is authorized to sign and file electronically all notices, orders, motions, applications and other requests for relief, all briefs, memoranda, affidavits, declarations, replies and other documents filed in support of such documents and all objections and responses related to any such documents filed by any party in these Chapter 11 Cases.

10. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

11. The Court retains exclusive jurisdiction and power with respect to all matters arising from or related to the interpretation, implementation, or enforcement of this Order.

Dated: ____________________, 2026

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THE HONORABLE ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE

Exhibit B

Sandler Declaration

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

In re:	Chapter 11
LURIN REAL ESTATE HOLDINGS XXI, LLC, *et al.*,[1]	Case No. 26-90344 (ARP)
Debtors.	(Jointly Administered)

DECLARATION OF BRADFORD J. SANDLER IN SUPPORT OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO RETAIN AND EMPLOY PACHULSKI STANG ZIEHL & JONES LLP AS COUNSEL EFFECTIVE AS OF MAY 7, 2026

I, Bradford J. Sandler, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, and pursuant to Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2014-1 of the *Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas*, that the following is true and correct:

1. I am a partner with the law firm of Pachulski Stang Ziehl & Jones LLP ("PSZJ" or the "Firm"), with an address of 1700 Broadway, 36th Floor, New York, NY 10019. I am duly admitted to practice law in the States of Delaware, Pennsylvania, New Jersey, and New York and have been admitted *pro hac vice* in these Chapter 11 Cases.

2. I am authorized to submit this declaration (the "Declaration") in support of the *Application of the Official Committee of Unsecured Creditors to Retain and Employ Pachulski Stang Ziehl & Jones LLP as Counsel Effective as of May 7, 2026* (the "Application").[2]

[1] A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at https://restructuring.ra.kroll.com/Lurin/Home-Index. The location of the Debtors' service address is: 2101 Cedar Springs, Suite 1050, Dallas, TX 75201.

[2] A capitalized term used but not defined herein shall have the meaning ascribed to it in the Application.

3. PSZJ has approximately eighty-five (85) attorneys with a practice concentrated on corporate reorganizations, bankruptcy, litigation, and commercial matters. The Firm's attorneys have comprehensive experience representing creditors' committees, debtors, creditors, trustees, and others in a wide variety of bankruptcy cases. Attorneys of the Firm have extensive experience representing creditors' committees in complex chapter 11 cases in this district and throughout the country, including in the cases of *Axip Energy Services, LP, Pine Gate Renewables, LLC*, *Worldwide Machinery Group, Inc.*, *Conn's, Inc.*, *Hornblower Holdings LLC*, *Surgalign Holdings, Inc.*, *Party City Holdco Inc.*, *Cineworld Group plc*, *Altera Infrastructure LP*, *Talen Energy Supply LLC*, *Sungard AS New Holdings, LLC*, *Agilon Energy Services*, *Limetree Bay Services*, *Tailored Brands*, *Neiman Marcus Group*, *Whiting Petroleum*, *Cobalt Energy*, *Erin Energy*, *Ignite Restaurants*, *Rockall Energy Holdings*, *Spherature Investments*, *Studio Movie Grill*, *Rita Restaurants*, and *Reddy Ice*. Accordingly, the Firm is well-qualified to render the services described below.

4. Section 1103(b) of the Bankruptcy Code does not impose the general "disinterestedness" standard of section 327(a) on proposed counsel to an official committee of unsecured creditors. However, Bankruptcy Rule 2014 requires that an application for employment under section 1103 disclose all connections with the Debtors, their estates, professionals, and the U.S. Trustee.

5. The Firm has made the following investigation of its connections prior to submitting this Declaration. The Firm has undertaken a full and thorough review of its computer database, which contains the names of clients and other parties in interest in particular matters. PSZJ requires all of its professionals, before accepting the representation of a new client, or the representation of an existing client in a new matter, to perform a conflicts check through the

Firm's database and to enter conflict information regarding new clients or new matters into that database. Thus, a review of said computerized database should reveal any and all actual or potential conflicts of interest with respect to any given representation. In particular, an employee of the Firm, under my supervision, entered the names of individuals and entities received from the Debtors that may be parties in interest in these Chapter 11 Cases (the "Potential Parties in Interest") through the Firm's database. In addition to the Potential Parties in Interest lists received from the Debtors, the Firm also searched the members of the Committee and all Committee professionals through its database. As of the date hereof, the Firm has entered and searched the names of the Potential Parties in Interest. The Firm continues to search its computerized database for the names of the Potential Parties in Interest and will provide a further declaration to the extent necessary.

6. Based on the Firm's ongoing conflict check within its database, and out of an abundance of caution, the Firm provides the following disclosures, which do not result in a conflict, and, for the avoidance of doubt, PSZJ does not and will not represent such parties in connection with these Chapter 11 Cases:

Entity Name	**Position in Case**	**PSZJ Disclosure**
Hiller Systems	30 Largest Unsecured Creditors	The Firm represents The Hiller Companies LLC in unrelated matters.
Denton	Lender Professionals	The Firm represent Dentons LLP in connection with potential claims arising in relation to the bankruptcy case of Terraform Labs Pte. Ltd., *et al*. pending in the US Bankruptcy Court, Delaware, Case No. Case No. 24-10070 (BLS). The party adverse to Dentons is the Plan Administrator of Terraform Labs Pte. Ltd., *et al.*, Todd R. Snyder.

7. Out of an abundance of caution, the Firm discloses that Mr. Theodore S. Heckel, an associate at PSZJ, previously worked as an associate at Weil Gotshal & Manges LLP with Judge Pérez prior to the time of Judge Pérez's retirement from such firm. This disclosure does not result in conflict.

8. The Debtors have sought the Court's approval to retain several professionals, including, among others, Porter Hedges, LLP, GlassRatner Advisory & Capital Group, LLC, Marcus & Millichap Real Estate Investment Services, Southwest Residential Partners Inc. d/b/a Newmark, Cushman & Wakefield U.S., Inc., and Kroll. PSZJ has previously worked with, currently works with, and will continue to work with some or all of such professionals, as well as professionals retained by other parties-in-interest in these Chapter 11 Cases, on various representations in other cases, at times representing the same parties and at other times representing parties with similar interests or parties with adverse interests.

9. The Firm and certain of its attorneys have represented and in the future will likely represent creditors of the Debtors in connection with matters unrelated to the Debtors and these Chapter 11 Cases. Additionally, the Firm represented, represents, and in the future will likely represent, in matters wholly unrelated to these Chapter 11 Cases, potential parties in interest that may be interested in acquiring all or a portion of the Debtors' assets in these Chapter 11 Cases. For the avoidance of doubt, the Firm does not and will not represent any such parties in interest in these Chapter 11 Cases.

10. The Firm represented, represents, and in the future will likely represent committees in matters unrelated to the Debtors and these Chapter 11 Cases, whose members may be creditors and/or committee members in these Chapter 11 Cases. For the avoidance of doubt, the Firm has not directly represented any member of the Committee.

11. Neither I, the Firm, nor any partner, of counsel or associate thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors, or any other parties in interest herein, or their respective attorneys and accountants, the U.S. Trustee, or any person employed in the Office of the United States Trustee (the "U.S. Trustee") or any Bankruptcy Judge currently serving on the United States Bankruptcy Court for the Southern District of Texas, except as set forth herein.

12. If, at any time during the course of these Chapter 11 Cases, PSZJ learns of any representation which may give rise to a conflict, the Firm will promptly file with the Court an amended Declaration identifying and specifying such involvement, and the Firm will address the issue with the Committee and its other retained professionals.

13. PSZJ has not received any retainer or payment from the Debtors or the Committee. Nor has the Firm received any promise of payment in connection with these Chapter 11 Cases. No compensation has been paid or promised to be paid from a source other than the Debtors' estates in these Chapter 11 Cases. No promises have been received by the Firm nor by any attorneys thereof as to compensation in connection with these Chapter 11 Cases, other than in accordance with the provisions of the Bankruptcy Code. PSZJ has no agreement with any other entity to share with such entity any compensation received by the Firm in connection with these Cases, except among the partners, of counsel, and associates of the Firm. Neither the Committee nor its members (or any of their representatives) are or will be liable for fees or costs incurred by the Firm in its representation of the Committee.

14. PSZJ intends to apply for compensation for professional services rendered in connection with these Chapter 11 Cases subject to approval of this Court as stated in the Application, and in compliance with applicable provisions of the Bankruptcy Code, on an hourly

basis, plus reimbursement of actual, necessary expenses and other charges incurred by the Firm. No compensation will be paid to the Firm except upon compliance with the Bankruptcy Code, Bankruptcy Rules, Bankruptcy Local Rules, and any other applicable procedures and orders of this Court. The Firm's current standard hourly rates are:

Partners	$1,150 - $2,695 per hour
Of Counsel	$1,175 - $2,050 per hour
Associates	$725 - $1,350 per hour
Paraprofessionals	$625 - $695 per hour

15. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions, and such changes will be noticed in accordance with the Bankruptcy Local Rules and/or practice.

16. It is the Firm's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, telephone and telecopier toll and other charges, mail and express mail charges, special or hand delivery charges, document retrieval, photocopying charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by the Firm to outside copying services for use in mass mailings, expenses for "working meals," computerized research, transcription costs, as well as non-ordinary overhead expenses such as secretarial and other overtime. The Firm will charge the Committee for these expenses in a manner and at rates consistent with charges made generally to the Firm's other clients, and in accordance with Local Rules and practices. The Firm believes that it is fairer to charge these expenses to the clients incurring them than to increase the hourly rates and spread the expenses among all clients.

17. Subject to Court approval, the Committee may seek to retain various professionals during the pendency of these chapter 11 cases, including Province as financial advisor. PSZJ intends to work closely with any such professionals retained by the Committee, including

Province, to ensure that there is no unnecessary duplication of services performed on behalf of the Committee or charged to the Debtors' estates.

18. The Firm provides the following responses to the questions set forth in Part D of the Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under United States Code by Attorneys in Larger Chapter 11 Cases (the "Revised UST Guidelines"):

Questions Required by Part D1 of Revised UST Guidelines:	**Answer:**	**Further explanation:**
Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?	No.	N/A
Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?	No.	N/A
If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and reasons for the difference.	N/A	N/A
Has your client approved your respective budget and staffing plan, and, if so, for what budget period?	N/A	N/A

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 8, 2026

/s/ Bradford J. Sandler
Bradford J. Sandler

Parties in Interest List

Affiliated Entities

AIAJ Texas Insurance Company, LLC
Bluescape Holdings LLC
Bluescape Resources Company LLC
Flamands Holdings LLC
Forward Building Products
Gouverneur Holdings, LLC
Gustavia Holdings LLC
Integrated Renovations
Lurin Associates, LLC
LURIN Capital, LLC
Lurin Equity Partners LXV, LLC
Lurin Equity Partners XI, LLC
Lurin Equity Partners XXI, LLC
Lurin Equity Partners XXVIII, LLC
Lurin Equity Partners XXXIII, LLC
Lurin Equity Partners XXXVIII, LLC
LURIN Holdings, LLC
Lurin Management Services LLC
Lurin Multi-Family Partners, LLC
Lurin Property Management, LLC
Lurin Real Estate Holdings III, LLC
Lurin Real Estate Holdings LIII, LLC
LURIN Real Estate Holdings LIV, LLC
Lurin Real Estate Holdings LIX, LLC
LURIN Real Estate Holdings LVII, LLC
Lurin Real Estate Holdings LXIII, LLC
LURIN Real Estate Holdings VI, LLC
Lurin Real Estate Holdings XIV, LLC
LURIN Real Estate Holdings XL, LLC
LURIN Real Estate Holdings XLI, LLC
LURIN Real Estate Holdings XLIII, LLC
Lurin Real Estate Holdings XV, LLC
Lurin Real Estate Holdings XVI, LLC
Lurin Real Estate Holdings XXI FHTX, LLC
LURIN Real Estate Holdings XXIII, LLC
LURIN Real Estate Holdings XXIV, LLC
LURIN Real Estate Holdings XXIX, LLC
LURIN Real Estate Holdings XXV, LLC
LURIN Real Estate Holdings XXVI, LLC
LURIN Real Estate Holdings XXXI, LLC
LURIN Real Estate Holdings XXXII, LLC
LURIN Real Estate Holdings XXXIV, LLC
LURIN Real Estate Holdings XXXV, LLC
LURIN Real Estate Holdings XXXVI, LLC
Lurin Real Estate II, LLC
Lurin, Inc.
The ASV Dynasty Trust
The JPV Dynasty Trust

Bank

Benchmark
CommerceOne Bank
Vista
Wells Fargo Bank, N.A.

Bankruptcy Judges and Staff

Chief Judge Eduardo V. Rodriguez
Judge Alfredo R Pérez
Judge Christopher M. Lopez
Judge Jeffrey P. Norman
Judge Marvin Isgur
Aaron Jackson
Ana Castro
Garrett Cole
Jeannie Chavez
Rosario Saldana
Shannon Holden
Sierra Thomas-Anderson
Tracey Conrad
Tyler Laws
Yesenia Lila

Committee Members

Joseph Malone
South Texas Plumbing
Southland Property Tax Consultants, Inc.

Committee Professionals

Province, LLC

Co-Obligor

Available upon request.

Parties in Interest List

Debtor
LURIN Advisors LLC
Lurin Equity Partners XL, LLC
Lurin Equity Partners XLI, LLC
Lurin Equity Partners XLIII, LLC
Lurin Equity Partners XXXIV, LLC
Lurin Real Estate Holdings LXIV, LLC
LURIN Real Estate Holdings LXV, LLC
LURIN Real Estate Holdings XI, LLC
Lurin Real Estate Holdings XLII, LLC
LURIN Real Estate Holdings XXI, LLC
LURIN Real Estate Holdings XXII, LLC
LURIN Real Estate Holdings XXVI, LLC
Lurin Real Estate Holdings XXVIII, LLC
LURIN Real Estate Holdings XXVIII, LLC
LURIN Real Estate Holdings XXXIII, LLC
LURIN Real Estate Holdings XXXVIII, LLC
Lurin, LLC

Debtor Professional Services
Grant Thornton Advisors LLC
Gray Reed Mcgraw
Southland Property Tax Consultants, Inc.
Teleperformance
The Cweren Law Firm LLC

Debtor Professionals
Cushman & Wakefield U.S., Inc.
GlassRattner
Kroll Restructuring Administration LLC
Southwest Residential Partners Inc. d/b/a Newmark

Governmental
City of Houston – Burglar Alarm Administration
City of Houston Municipal Courts Dept.
City Of St. Petersburg
Clerk Of Courts Okaloosa County
Esambia County Tax Collector
Internal Revenue Service
Okaloosa County Tax Collector
State of Florida, Department of Health
State of Florida, Office of the Attorney General
State of Texas, Office of the Attorney General
Tax Assessor Collector
United States Attorney's Office, Southern District of Texas

Insider
Available upon request.

Lender Professionals
Dentons
Polsinelli Law Firm
Thompson Hine LLP

Litigation
Ally Waste Services Inc

Receiver
Hilco Global

Secured Lender
BARCLAYS
BDS IV Mortgage Capital J LLC
BDS V REIT LLC
FANNIE MAE
GRANITE POINT MORTGAGE TRUST
JLL Real Estate Capital LLC
KEYBANK
Keybank National Association
Prime Finance Short Duration Holding Company VIII, LLC
PRIME FINANCIAL
SERVISFIRST BANK

Top 30 Unsecured Creditors
Apartment Lists, Inc.
AT&T
Chadwell Supply, Inc.
Colorstar Painting
Complete Apartment Care, LLC
Conservice, LLC
EHL Construction and Painting Corp.
Emerald Coast Utilities Authority
Florida Power & Light
Green Days Lawn Care

Parties in Interest List

Hiller Systems
Impact Floors of Texas LP
Landscape Workshop, LLC
Nationwide Compliant, LLC
OneStop Renovation LLC
Pink Star Pest Control LLC
ProEnergy
Queen Luxe Construction
Real Floors, Inc.
Redi Carpet
Rent Ready, LLC
Republic Services – Louisville, KY
Roadrunner Modern Waste & Recycling
South Texas Plumbing
Southland Property Tax Consultants, Inc.
Tex-Plus General Remodeling Services
The Cweren Law Firm LLC
TXU Energy
Waste Management
Willscot Mobile Mini

Trade Debt

A&B Aquatics Operating, Llc
Aaa Airwaves
Aaa Business Systems
AAA Plumbers
ABC Home & Commercial Service
ABC Pest Control of Houston Inc.
Acuity Electric Inc.
Advanced Fire Protection Services Inc.
Ajiaj Insurance Company LLC
All-Tex Boiler And Plumbing Services, LLC
American Pest Management, Inc.
Apartment Lists, Inc.
Apartments, Llc
Aqua Pool & Patio
AT&T
B & G Construction
Bates Electric, Inc.
Bay Area Apartment Association
Brex
Canon Financial Services, Inc
Carpet Care Specialists
Cerv Pest Solutions, Llc
Chadwell Supply, Inc.
Charter Communications
Checkpoint Id, Inc.
Cintas Corporation No. 2
Cintas Corporation No. 3
Cintas Corporation No. 4
Cintas Corporation No. 5
Cintas Corporation No. 6
Cintas Corporation No. 7
Cintas Corporation No. 8
Clean And Fresh Inc
Coinmatch Corporation
Colleen AI Inc.
Colorstar Painting
Complete Apartment Care, LLC
Conservice, LLC
Conversion Logix Llc
Cordova Multi Services, Llc
Cornerstone Commercial Flooring Companies L.L.C
Cornerstone Commercial Flooring, Llc
Cox Communications
Creative Multicare, Inc.
Culligan Of Fort Walton Beach
Cwc Renovation Inc
Dean Motis LLC
Department Of Business And Professional Regulation
Distributor Appliance Parts, Inc
Diversity Security Services LLC
Doorking Inc.
EHL Construction and Painting Corp.
Entrata Inc.
Expert Security Professionals
Fire-N-Ice Heating And Air Conditioning, Inc.
Floor Pro Of Tampa Bay
Forward Building Products LLC
G5 Search Marketing
Geo's Solutions Contractor Llc
Glass Doctor
Greater Quality Pool Service, Llc

Parties in Interest List

Green Castle Lawn Care Fl Llc
Green Days Lawn Care
Gulf Pool Services Inc.
Guy Roofing Inc.
Handytrac Systems, Llc
Hd Supply Facilities Maintenance Ltd
Hiller Systems
Home Star Cleaning
Howard Technology Solutions
ICO Uniforms
Impact Floors of Texas LP
Impact Floors Of Texas, LLC
Integrated Renovations
Intersolutions, Llc
J Rolman Painting Inc
J&H Painting Services
JP Rainbow Painting, LLC
KG Restoration, LLC
Kings III of America LLC
Landscape Workshop LLC
Lowe's Pro Supply
Lurin Property Management LLC (DBA Steward+Helm)
Meri Lawn Care And Landscaping
Monge Contracting Group, LLC
Nationwide Compliant, LLC
Naturebox, Inc
Northwest Florida Apartment Association
OneStop Renovation LLC
Pink Star Pest & Lawn
Pink Star Pest Control LLC
Pipes Patrol Llc
Pleitez Carpet Cleaning
Poseidon Pools Of Emerald Coast LLC
Pro Green Grounds Maintenance Llc
Queen Luxe Construction
Rapco Supply
Rasi Entity Staffing LLC
Real Floors, Inc.
Redi Carpet
Redline Fire Watch Of Tampa Bay
Registered Agent Solutions Inc.
Rent Ready, LLC
Rentable
Rentgrow Inc.
Rentokil Pest Control
Rentpath Holdings Inc.
Republic Services – Louisville, KY
Roadrunner Recycling Inc
Rocky's Termite & Pest Control LLC
Roto-Rooter Service Company
Same Day Plumbing & Air Professional Dorp
Scentair Holdings, Llc
South Texas Plumbing
Southcross Security Inc.
Spectrum
Staples Inc.
Suburban Propane Lp
Surface Connection
Switch Electric, Llc
System4, Llc
TAA Click & Lease LLC
Talon Plumbing
Tex-Plus General Remodeling Services
Texplus Services Inc
The Guarantee Company Of North America USA
The Hiller Companies Inc.
The Sherwin-Williams Co.
TXU Energy
Venturi Restoration
Waste Management
Williams Scotsman Inc.
Willscot Mobile Mini
Wood Electrical Services, Inc.
Zillow, Inc.
Zumper, Inc.
AFPS
Cintas Corp
Clerk Of Courts Escambia County
Cordova Property Services Llc
Crown Plumbing
CSC
Escambia County Sherriff
Ferguson Facilities Supply

Parties in Interest List

Hiller Group
Jared Solutions Inc
Knox Pest Control
Larry Downs Plumbing
Lee Property Improvements Llc
Quality Vending
Real Floors
Roto Rooter
Scapin Electric Company
White Sands Electric Inc.
Xtreme Logistics
Yardi Payments

U.S. Trustee Office

AUBREY THOMAS
Christopher Ross Travis
GARY WRIGHT
Jayson B. Ruff
KEVIN M. EPSTEIN
Millie Aponte Sall

Utility

City of Houston Water Department
Emerald Coast Utilities Authority
Florida Power & Light
Okaloosa County Water & Sewer
ProEnergy
Reliant
Reliant Energy
Roadrunner Modern Waste & Recycling
Cox Business
FPL Northwest Fl
Republic Services

Exhibit C

Malone Declaration

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

In re: LURIN REAL ESTATE HOLDINGS XXI, LLC, *et al.*,[1] Debtors.	Chapter 11 Case No. 26-90344 (ARP) (Jointly Administered)

DECLARATION OF JOSHUA MALONE IN SUPPORT OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO RETAIN AND EMPLOY PACHULSKI STANG ZIEHL & JONES LLP AS COUNSEL EFFECTIVE AS OF MAY 7, 2026

I, Joshua Malone, declare under penalty of perjury as follows:

1. I was elected as a Chair of the Official Committee of Unsecured Creditors (the "Committee") appointed in the above-referenced chapter 11 cases (the "Chapter 11 Cases") of the above-captioned debtors (collectively the "Debtors"). I am authorized to submit this declaration (this "Declaration") in support of the *Application of the Official Committee of Unsecured Creditors to Retain and Employ Pachulski Stang Ziehl & Jones LLP as Counsel Effective as of May 7, 2026* (the "Application"), on behalf of the Committee.[2]

The Committee's Selection of the Firm as Counsel

2. Pachulski Stang Ziehl & Jones LLP (the "Firm") is proposed to serve as counsel to the Committee. The Committee recognizes that a review process is necessary in managing counsel to ensure that bankruptcy professionals are subject to the same scrutiny and accountability as professionals in non-bankruptcy engagements. The review process utilized by

[1] A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at https://restructuring.ra.kroll.com/Lurin/Home-Index. The location of the Debtors' service address is: 2101 Cedar Springs, Suite 1050, Dallas, TX 75201.

[2] A capitalized term used but not defined herein shall have the meaning ascribed to it in the Application.

the Committee here assessed potential committee counsel based on their expertise in the relevant legal issues and in similar proceedings, as well as the Firm's experience before this Court.

3. On May 5, 2026, the Office of the United States Trustee (the "U.S. Trustee") appointed the Committee pursuant to section 1102 of the Bankruptcy Code. The Committee consists of the following three (3) members, as may be reconstituted from time to time: (i) Joshua Malone; (ii) South Texas Plumbing; and (iii) Southland Property Tax Consultants, Inc. *See* Docket No. 265.

4. On May 7, 2026, the Committee held a meeting and, among other things, voted to retain the Firm as its counsel, subject to this Court's approval. The Committee believes that the Firm's extensive experience in corporate reorganizations, both out of court and under chapter 11 of the Bankruptcy Code, makes it well qualified to represent the Committee in these Chapter 11 Cases in an efficient and timely manner. Thus, the Committee decided to retain the Firm as the Committee's counsel during these Chapter 11 Cases.

Rate Structure

5. In my capacity as a Chair of the Committee, I, and other members of the Committee, are responsible for supervising the Committee's professionals, including the Firm. The Firm has informed the Committee that its rates are consistent between bankruptcy representations, including related transactional and litigation services. The Firm has informed the Committee that its current hourly rates apply to non-bankruptcy services, if any, provided by the Firm. I therefore understand that the Firm therefore does not have different billing rates and terms for non-bankruptcy engagements that can be compared to the billing rates and terms for the Committee's engagement of the Firm.

Cost Supervision

6. The Committee will approve any prospective budget and staffing plan that may be filed by the Firm prior to it being filed, recognizing that, in the course of large chapter 11 cases like these Chapter 11 Cases, it is possible that there may be a number of unforeseen fees and expenses that will need to be addressed by the Committee and the Firm. I further recognize that it is the Committee's responsibility to closely monitor the billing practices of their professionals to ensure the fees and expenses paid by the estates remain consistent with the Committee's expectations and the exigencies of the Chapter 11 Cases. The Committee will review the invoices that the Firm regularly submits, and, together with the Firm, periodically amend any budget and staffing plans, as the Chapter 11 Cases develop.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 8, 2026

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF LURIN REAL ESTATE HOLDINGS XXI, LLC, *ET AL.*

By: */s/ Joshua Malone*
Joshua Malone, solely in their capacity as Chair of the Official Committee of Unsecured Creditors of Lurin Real Estate Holdings XXI, LLC, *et al.*, and not in any other capacity