

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

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In re	:	
	:	Case No. 25 - 11403 (TMH)
VALVES AND CONTROLS US, INC.,	:	
	:	
Debtor.¹	:	
	:	Hearing Date: January 27, 2026 at 11:00 a.m. (ET)
-----	x	Objection Deadline: January 5, 2026 at 4:00 p.m. (ET)

**SUMMARY OF FIRST INTERIM
FEE APPLICATION OF COLE SCHOTZ P.C., DELAWARE
CO-COUNSEL TO THE DEBTOR AND DEBTOR IN POSSESSION,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD FROM JULY 25, 2025 THROUGH OCTOBER 31, 2025**

Name of Applicant:	Cole Schotz P.C.
Authorized to provide professional services to:	Valves and Controls US, Inc.
Date of retention:	August 29, 2025 (Effective as of July 25, 2025) [Docket No. 82]
Period for which compensation and reimbursement is sought:	July 25, 2025 through October 31, 2025
Amount of compensation sought as actual, reasonable and necessary:	\$118,567.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$3,233.56
This is a:	___monthly <u>X</u> interim ___ final application
Prior Interim Applications:	None

¹ The last four digits of the Debtor's federal tax identification number are 3959. The Debtor's mailing address is 777 Main Street, Suite 2050, Fort Worth, TX 76102.

Prior Monthly Fee Application(s):

Monthly Application		Requested Fees and Expenses		Allowed Fees and Expenses		Unpaid Fees and Expenses	
Monthly Fee Period, Application Docket No., and Date Filed	CNO Docket No. and Date Filed	Total Fees Requested	Total Expenses Requested	Fees – Amount Allowed	Expenses – Amount Allowed	Unpaid Fees	Unpaid Expenses
07/25/2025-8/31/2025 D.I. 141 10/08/2025	D.I. 168 10/30/2025	\$76,330.00	\$3,233.56	\$61,064.00	\$3,233.56	\$15,266.00	\$0.00
09/01/2025-09/30/2025 D.I. 174 10/31/2025	D.I. 189 11/24/2025	\$17,491.50	\$0.00	\$13,993.20	\$0.00	\$3,498.30	\$0.00
10/01/2025-10/31/2025 D.I. 198 12/01/2025	N/A ²	\$24,745.50	\$0.00	\$0.00	\$0.00	\$24,745.50	\$0.00
Total		\$118,567.00	\$3,233.56	\$75,057.20	\$3,233.56	\$43,509.80	\$0.00

² The objection deadline with respect to Cole Schotz's Third Monthly Fee Application has not yet passed, and a certificate of no objection has, therefore, not yet been filed.

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

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In re	:	
	:	Case No. 25 - 11403 (TMH)
VALVES AND CONTROLS US, INC.,	:	
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Debtor.¹	:	
	:	Hearing Date: January 27, 2026 at 11:00 a.m. (ET)
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**FIRST INTERIM FEE
APPLICATION OF COLE SCHOTZ P.C., DELAWARE
CO-COUNSEL TO THE DEBTOR AND DEBTOR IN POSSESSION,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD FROM JULY 25, 2025, THROUGH OCTOBER 31, 2025**

Cole Schotz P.C. (the “**Applicant**” or “**Cole Schotz**”), Delaware co-counsel to the above-captioned debtor and debtor in possession (the “**Debtor**”), hereby submits this first interim fee application (the “**Application**”) pursuant to (i) sections 330 and 331 of title 11 of the United State Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”), (ii) Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), (iii) Rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), and (iv) the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* [Docket No. 86] (the “**Interim Compensation Order**”)² for allowance of compensation for services rendered and reimbursement of expenses for the period from July 25, 2025 through October 31, 2025

¹ The last four digits of the Debtor’s federal tax identification number are 3959. The Debtor’s mailing address is 777 Main Street, Suite 2050, Fort Worth, TX 76102.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

(the “**Interim Fee Period**”). In support of this Application, Cole Schotz respectfully represents as follows:

Jurisdiction and Venue

1. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. §1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the “Court”) under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. Cole Schotz confirms its consent, pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-1.

Background

A. The Chapter 11 Case

4. On July 25, 2025 (the “**Petition Date**”), the Debtor commenced with the Court a voluntary case under chapter 11 of the Bankruptcy Code. The Debtor is authorized to continue to operate as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this chapter 11 case. On August 14, 2025, the United States Trustee for Region 3 (the “**U.S. Trustee**”) appointed an official committee of unsecured creditors (the “**UCC**”) [Docket No. 56].

5. Additional information regarding the Debtor’s business and the circumstances leading to the commencement of this chapter 11 case is set forth in the *Declaration of Scott M.*

Tandberg in Support of Debtor's Chapter 11 Petition and First Day Relief, sworn to on the date hereof (the “**First Day Declaration**”) [Docket No. 2].

B. The Retention of Cole Schotz

6. On August 7, 2025, the Debtor applied to the Court for an order authorizing the retention and employment of Cole Schotz as Debtor's Delaware co-counsel effective as of the Petition Date. *See* Docket No. 48. On August 29, 2025, the Court entered an order authorizing such retention. *See* Docket No. 82.

C. The Interim Compensation Order

7. The Interim Compensation Order sets forth the procedures for interim compensation and reimbursement of expenses in this chapter 11 case. Specifically, the Interim Compensation Order provides that beginning with the period ending on October 31, 2025, and at three-month intervals thereafter, any Retained Professional may file an interim fee application (the “**Interim Fee Application**”) for compensation and reimbursement of expenses sought in the Monthly Fee Application. *See* Interim Compensation Order ¶ 2(B). Application Recipients will have twenty-one (21) days after service of an Interim Fee Application to object thereto (the “**Interim Fee Application Objection Deadline**”). *Id.* ¶ 2(B)(iv). Provided that no objection to an Interim Fee Application is filed by the Interim Fee Application Objection Deadline, the Court, in its discretion, may approve an uncontested Interim Fee Application without the need for a hearing upon the Professional's filing of a certificate of no objection. *Id.* ¶ 2(B)(v).

Relief Requested

8. Pursuant to the Interim Compensation Order and section 331 of the Bankruptcy Code, Cole Schotz is seeking compensation in the amount of \$118,567.00 in fees for professional services rendered by Cole Schotz during the Interim Fee Period. This amount is derived solely

from the applicable hourly billing rates of Cole Schotz personnel who rendered such services to the Debtor. In addition, Cole Schotz is seeking reimbursement of expenses incurred during the Interim Fee Period in the amount of \$3,233.56.

Interim Fee Application and Compliance with Guidelines

9. This Application was prepared in accordance with (a) Local Rule 2016-1, (b) the United States Trustee *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, adopted on June 11, 2013 (the “UST Guidelines”), and (c) the Interim Compensation Order (collectively with Local Rule 2016-1 and the UST Guidelines, the “Guidelines”).

10. Annexed hereto are various schedules required by the Guidelines, as applicable.

11. Applicant provides the following responses to the questions set forth under ¶ C.5 of Appendix B of the UST Guidelines:

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Response: No.

Question: If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: The fees sought in this Application are less than the amount budgeted for the Interim Fee Period.

Question: Have any of the professionals included in this fee application varied their hourly rates based on the geographic location of the bankruptcy case.

Response: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? If so, please quantify by hours and fees.

Response: No.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: Does this fee application include rate increases since retention?

Response: Yes.

Reasonable and Necessary Services

12. The services for which Applicant seeks compensation were, at the time rendered, necessary for, beneficial to and in the best interests of the Debtor's estate. The services rendered were consistently performed in a timely manner commensurate with the complexity, importance and nature of the issues involved. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Applicant is fair and reasonable given (i) the complexity of this chapter 11 case; (ii) the time expended; (iii) the nature and extent of the services rendered; (iv) the value of such services; and (v) the costs of comparable services other than in a case under this title.

Certification of Compliance and Waiver

13. The undersigned representative of Cole Schotz certifies that he has reviewed the requirements of Local Rule 2016-1, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-1, Cole Schotz believes that such deviations are not material and respectfully requests that any such requirements be waived.

Notice

14. Cole Schotz will provide notice and serve this Application on the Fee Notice Parties (as defined and set forth in the Interim Compensation Order). In light of the nature of the relief requested in this Application, Cole Schotz submits that no other or further notice is required.

No Prior Request

15. No prior request for the relief sought in the Application has been made to this or any other court

Conclusion

WHEREFORE, Cole Schotz respectfully requests the Court enter an order (i) approving the Application; (ii) awarding Cole Schotz compensation for the Application Period in the amount of \$118,567.00 and reimbursement for actual and necessary expenses in the amount of \$3,233.56; (iii) authorizing the payment of such sums to Cole Schotz; and (iv) granting such other and further relief as the Court may deem just and proper.

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Dated: December 15, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)

Michael E. Fitzpatrick (No. 6797)

Melissa M. Hartlipp (No. 7063)

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-and-

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*Attorneys for the Debtor
and the Debtor in Possession*

VALVES AND CONTROLS US, INC.**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES**

The aggregate hourly rate for all Cole Schotz Delaware, New Jersey and New York non-bankruptcy timekeepers (including both attorneys and paralegals) (the “Non-Bankruptcy Blended Rate”) for the year ending December 31, 2024 (the “Comparable Period”) was \$592.88 per hour, and the aggregate hourly rate for all Cole Schotz Delaware, New Jersey and New York bankruptcy timekeepers (including both attorneys and paralegals) (the “Bankruptcy Blended Rate”) for the Comparable Period was \$714.98 per hour.

The blended hourly rate for all Cole Schotz timekeepers (including both attorneys and paralegals) who provided services to the Debtor during the Interim Fee Period was approximately \$587.55 per hour.

Category of Timekeeper	2024 Bankruptcy Blended Rate	2024 Non-Bankruptcy Blended Rate	Interim Fee Period Blended Rate
Member	\$852.79	\$720.58	\$933.47
Special Counsel	\$670.00	\$662.20	N/A
Associate	\$504.86	\$460.46	\$523.34
Paralegal	\$376.65	\$349.10	\$407.89
Aggregate	\$714.98	\$592.88	\$587.55

VALVES AND CONTROLS US, INC.

**STAFFING PLAN FOR COLE SCHOTZ P.C.
JULY 25, 2025 THROUGH OCTOBER 31, 2025**

ALL FIGURES ARE ESTIMATES

Category of Timekeeper	Estimated Number of Timekeepers Expected to Work on Matters During the Budget Period	Average Hourly Rate
Members & Special Counsel	1	\$950.00
Associates	2	\$550.00
Paralegals	1	\$410.00
	Estimated Blended Hourly Rate:	\$650.00

VALVES AND CONTROLS US, INC.**BUDGET AND BILLING BY PROJECT CATEGORY**
JULY 25, 2025 THROUGH OCTOBER 31, 2025

Project Category	Budgeted Hours	Budgeted Fees	Total Hours	Total Fees
Automatic Stay Matters/Litigation	5	\$3,250.00	0.2	\$133.00
Business Operations	5	\$3,250.00	4.9	\$3,093.00
Case Administration	50	\$32,500.00	61.7	\$35,236.50
Claims Analysis, Administration and Objections	5	\$3,250.00	0.5	\$325.00
Committee Matters and Creditor Meetings	5	\$3,250.00	1.3	\$958.00
Document Review/Committee Investigation	5	\$3,250.00	2.4	\$2,400.00
Fee Application Matters/Objections	25	\$16,250.00	26.2	\$14,369.00
General Corporate Advice	0	\$0.00	0.1	\$48.50
Litigation/Gen. (Except Automatic Stay)	5	\$3,250.00	5.7	\$3,493.50
Preparation for and Attendance at Hearings	50	\$32,500.00	23.3	\$12,879.00
Reorganization Plan	5	\$3,250.00	0.8	\$800.00
Reports, Statements and Schedules	50	\$32,500.00	23.7	\$15,459.50
Retention Matters	50	\$32,500.00	43.8	\$24,065.00
Rule 2004 Motions and Subpoenas	5	\$3,250.00	0.4	\$260.00
Tax/General	0	\$0.00	0.4	\$172.00
U.S. Trustee Matters and Meetings	5	\$3,250.00	6.4	\$4,875.00
TOTAL	270.0	\$175,500.00	201.8	\$118,567.00

VALVES AND CONTROLS US, INC.**SUMMARY OF BILLING BY PROFESSIONAL
JULY 25, 2025 THROUGH OCTOBER 31, 2025**

Attorney Name	Year Admitted	Position (Department)	Hourly Billing Rate	Total Hours Billed	Total Compensation
Patrick J. Reilley	2003	Member (Bankruptcy)	\$900.00	32.8	\$29,520.00
			\$1,000.00	16.5	\$16,500.00
Michael E. Fitzpatrick	2022	Associate (Bankruptcy)	\$575.00	27.9	\$16,042.50
			\$650.00	17.1	\$11,115.00
Melissa M. Hartlipp	2022	Associate (Bankruptcy)	\$420.00	34.5	\$14,835.00
			\$485.00	10.1	\$4,898.50
Pauline Z. Ratkowiak	N/A	Paralegal (Bankruptcy)	\$405.00	2.5	\$1,012.50
			\$425.00	4.3	\$1,827.50
Larry S. Morton	N/A	Paralegal (Bankruptcy)	\$400.00	37.3	\$14,920.00
			\$420.00	18.8	\$7,896.00
TOTAL				201.8	\$118,567.00

Total Requested Compensation:	\$118,567.00
Total Attorney Compensation:	\$92,911.00
Blended Rate All Attorneys:	\$668.91
Blended Rate All Timekeepers:	\$587.55

VALVES AND CONTROLS US, INC.**SUMMARY OF BILLING BY EXPENSE CATEGORY**
JULY 25, 2025 THROUGH OCTOBER 31, 2025

Expense Category	Service Provider (if applicable)	Total Expenses
Meals		\$375.63
Delivery/Couriers	Reliable/Parcels	\$353.72
Travel – Car Service		\$35.01
Telecommunications		\$42.00
Filing Fees	U.S. Bankruptcy Court	\$2,138.00
Transcripts	Reliable	\$174.00
Court Fees	Pacer	\$115.20
TOTAL		\$3,233.56

SUMMARY OF INTERIM FEE APPLICATION	
Name of Applicant	Cole Schotz P.C.
Name of Client	Valves and Controls US, Inc.
Fee period covered by Interim Fee Application	July 25, 2025 through October 31, 2025
Total compensation sought during Interim Period	\$118,567.00
Total expenses sought during Interim Period	\$3,233.56
Petition Date	July 25, 2025
Retention Date	August 29, 2025, effective as of July 25, 2025
Date of order approving employment	August 29, 2025
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00
Total allowed compensation paid to date	\$75,057.20
Total allowed expenses paid to date	\$3,233.56
Blended rate in Interim Fee Application for all Attorneys	\$668.91
Blended rate in Interim Fee Application for all Timekeepers	\$587.55
Compensation sought in this Interim Fee Application already paid pursuant to a monthly compensation order but not yet allowed	\$75,057.20
Expenses sought in this Interim Fee Application already paid pursuant to a monthly compensation order but not yet allowed	\$3,233.56
Number of professionals included in this Interim Fee Application	5
If applicable, number of professionals in this Interim Fee Application not included in staffing plan	1
If applicable, difference between fees budgeted and compensation sought for this Interim Fee Period	Budgeted: \$175,500.00 Difference: (\$56,933.00)
Number of professionals billing fewer than 15 hours to the case during this Interim Fee Period:	1
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this Interim Fee Application using the rates originally disclosed in the retention application:	Yes. Cole Schotz has an annual rate increase on September 1. Cole Schotz's rate increase resulted in \$4,051.00 of additional fees compared to the rates disclosed in the retention application.

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

In re:	x	
	:	Chapter 11
	:	
VALVES AND CONTROLS US, INC.,	:	Case No. 25 – 11403 (TMH)
	:	
Debtor. ¹	:	
	:	Hearing Date: January 27, 2026 at 11:00 a.m. (ET)
	x	Objection Deadline: January 5, 2026 at 4:00 p.m. (ET)

**NOTICE OF FIRST INTERIM
FEE APPLICATION OF COLE SCHOTZ P.C., DELAWARE
CO-COUNSEL TO THE DEBTOR AND DEBTOR IN POSSESSION, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM JULY 25, 2025 THROUGH OCTOBER 31, 2025**

PLEASE TAKE NOTICE that, on December 15, 2025, the *First Interim Fee Application of Cole Schotz P.C., Delaware Co-Counsel to the Debtor and Debtor in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from July 25, 2025 Through October 31, 2025* (the “**Application**”) was filed with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Application are required to be filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the following, **so as to be received no later than 4:00 p.m. (ET) on January 5, 2026** (the “**Objection Deadline**”): (a) the Debtor, Valves and Controls US, Inc., 777 Main Street, Suite 2050, Fort Worth, TX 76102 (Attn: Scott M. Tandberg, Chief Restructuring Officer (standberg@alixpartners.com)); (b) counsel to the Debtor, (i) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153 (Attn: Matthew S. Barr, Esq. (matt.barr@weil.com), Ronit J. Berkovich, Esq. (ronit.berkovich@weil.com), Lauren Tauro, Esq. (lauren.tauro@weil.com), and Alejandro Bascoy, Esq. (alejandro.bascoy@weil.com)) and (ii) Cole Schotz P.C., 500 Delaware Avenue, Suite 200, Wilmington, DE 19801 (Attn: Patrick J. Reilley, Esq. (preilley@coleschotz.com), Michael E. Fitzpatrick, Esq. (mfitzpatrick@coleschotz.com), and Melissa M. Hartlipp, Esq. (mhartlipp@coleschotz.com)); (c) the Office of the United States Trustee for the District of Delaware: 844 King Street, Wilmington, Delaware 19801 (Attn: Hannah J. McCollum (hannah.mccollum@usdoj.gov)); and (d) counsel to the official committee of unsecured creditors, (i) Brown Rudnick LLP, 7 Times Square, New York, New York 10036 (Attn: David J. Molton, Esq. (dmolton@brownrudnick.com), Jeffrey L. Jonas, Esq. (jjonas@brownrudnick.com), Eric R. Goodman, Esq.

¹ The last four digits of the Debtor’s federal tax identification number are 3959. The Debtor’s mailing address is 777 Main Street, Suite 2050, Fort Worth, TX 76102.

(egoodman@brownrudnick.com), and D. Cameron Moxley, Esq. (dmoxley@brownrudnick.com)), (ii) Caplin & Drysdale, Chartered, 1200 New Hampshire Avenue NW, 8th Floor, Washington, DC 20036 (Attn: Kevin C. Maclay (kmaclay@capdale.com) and Todd E. Phillips (tphillips@capdale.com)), and (iii) Raines Feldman Littrell LLP, 824 North Market Street, Suite 805, Wilmington, DE 19801 (Attn: Thomas J. Francella, Jr. (tfrancella@raineslaw.com)).

PLEASE TAKE FURTHER NOTICE that, a hearing on the Application will be held on **January 27, 2026, at 11:00 a.m. (ET)** before The Honorable Thomas M. Horan, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 5th Floor, Courtroom No. 5, 824 North Market Street, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE BY THE OBJECTION DEADLINE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE.

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Dated: December 15, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.
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-and-

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*Attorneys for Debtor
and Debtor in Possession*