

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

In re:

ADVANTAGE HOLDCO, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 20-11259 (CTG)
(Jointly Administered)

Obj. Deadline: July 15, 2021 at 4:00 p.m. (ET)
Hearing Date: August 2, 2021 at 10:00 a.m. (ET)

**SUMMARY OF FOURTH INTERIM FEE APPLICATION OF MORRIS JAMES LLP,
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE INTERIM PERIOD OF MARCH 1, 2021 THROUGH MAY 31, 2021**

Name of Applicant: Morris James LLP (the “Applicant” or “Morris James”)

Authorized to Provide Professional Services as: The Official Committee of Unsecured Creditors (the “Committee”)

Effective Date of Retention: June 11, 2020

Period for Which Compensation and Reimbursement is Sought: March 1, 2021 through and including May 31, 2021 (the “Application Period”)

Amount of Compensation sought as actual, reasonable and necessary legal services rendered: \$25,834.50

Amount of Expense Reimbursement sought as actual, reasonable and necessary: \$69.70

This is a(n): monthly X interim final application

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Advantage Holdco, Inc. (4832); Advantage Opco, LLC (9101); Advantage Vehicles LLC (6217); E-Z Rent A Car, LLC (2538); Central Florida Paint & Body, LLC (1183); Advantage Vehicle Financing LLC (7263); and RAC Vehicle Financing, LLC (8375). The Debtors’ address is PO Box 2818, Windermere, FL, 34786.

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Fees Requested	Total Expenses Requested	CNO Filing Date & Docket No.	Amount of Fees Authorized to be Paid (80%)	Amount of Expenses Authorized to be Paid (100%)
7/24/2020 [D.I. 395]	June 11, 2020 – June 30, 2020	\$54,420.50	\$0.00	8/11/2020 [D.I. 425]	\$43,536.40	\$0.00
8/18/2020 [D.I. 442]	July 1, 2020 – July 31, 2020	\$17,674.00	\$1,310.31	9/14/2020 [D.I. 484]	\$14,139.20	\$1,310.31
9/21/2020 [D.I. 498]	August 1, 2020 – August 31, 2020	\$6,065.00	\$30.35	10/07/2020 [D.I. 537]	\$4,852.00	\$30.35
10/16/2020 [D.I. 555]	September 1, 2020 – September 30, 2020	\$17,808.50	\$0.00	11/03/2020 [D.I. 581]	\$14,246.80	\$0.00
11/16/2020 [D.I. 594]	October 1, 2020 – October 31, 2020	\$7,426.00	\$12.75	12/02/2020 [D.I. 616]	\$5,940.80	\$12.75
1/15/2021 [D.I. 655]	November 1, 2020 – December 31, 2020	\$9,801.50	\$38.35	1/15/2021 [D.I. 655]	\$7,841.20	\$38.35
3/1/2021 [D.I. 703]	January 1, 2021 – January 31, 2021	\$4,085.50	\$71.45	3/1/2021 [D.I. 703]	\$3,268.40	\$71.45
3/24/2021 [D.I. 730]	February 1, 2021 – February 28, 2021	\$3,315.50	\$3.80	3/24/2021 [D.I. 730]	\$2,652.40	\$3.80
4/16/2021 [D.I. 768]	March 1, 2021 – March 31, 2021	\$7,559.50	\$25.70	4/16/2021 [D.I. 768]	\$6,047.60	\$25.70
5/17/2021 [D.I. 817]	April 1, 2021 – April 30, 2021	\$5,650.50	\$30.30	5/17/2021 [D.I. 817]	\$4,520.40	\$30.30
6/16/2021 [D.I. 849]	May 1, 2021 – May 31, 2021	\$12,624.50	\$13.70	N/A	N/A	N/A
TOTALS		\$146,431.00	\$1,536.71		\$107,045.20	\$1,523.01

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Obj. Deadline: July 15, 2021 at 4:00 p.m. (ET)
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**FOURTH INTERIM FEE APPLICATION OF MORRIS JAMES LLP, CO-COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE INTERIM PERIOD OF MARCH 1, 2021 THROUGH MAY 31, 2021**

Morris James LLP (“Morris James”), counsel for the Official Committee of Unsecured Creditors (the “Committee”) of Advantage Holdco, Inc., the debtors in the above-captioned chapter 11 cases (collectively, the “Debtors”), hereby files its *Fourth Interim Fee Application of Morris James LLP, co-counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Interim Period from March 1, 2021 through May 31, 2021* (the “Application”) for entry of an order pursuant to section 331 of title 11 of the United States Code, 11 U.S.C. §§101 *et seq.*, as amended (the “Bankruptcy Code”) for allowance of interim compensation in the amount of \$25,834.50 and reimbursement of expenses in the amount \$69.70 for the period from March 1, 2021 through May 31, 2021 (the “Interim Compensation Period”), in support thereof, Morris James respectfully represents as follows:

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A) and (B).

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Advantage Holdco, Inc. (4832); Advantage Opco, LLC (9101); Advantage Vehicles LLC (6217); E-Z Rent A Car, LLC (2538); Central Florida Paint & Body, LLC (1183); Advantage Vehicle Financing LLC (7263); and RAC Vehicle Financing, LLC (8375). The Debtors’ address is PO Box 2818, Windermere, FL, 34786.

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

3. The statutory predicate for the relief sought herein is section 331 of the Bankruptcy Code.

BACKGROUND

4. On May 26, 2020, (the “Petition Date”), the Debtors commenced the above-captioned bankruptcy cases (the “Chapter 11 Cases”) by filing voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.

5. The Debtors have continued in the possession of their property and have continued to operate and manage its business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

6. On June 9, 2020, the United States Trustee for the District of Delaware (the “United States Trustee”) appointed the three (3) member Committee pursuant to section 1102(a)(1) of the Bankruptcy Code,² and, on June 11, 2020, the Committee selected Baker & Hostetler LLP (“Baker”) and Morris James to serve as co-counsel to the Committee.

7. On June 29, 2020, the Debtors filed a Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (the “Administrative Compensation Motion”) [Docket No. 307], and on July 15, 2020, the Court entered an Order approving the Administrative Compensation Motion (the “Administrative Compensation Order”) [Docket No. 372].

8. On July 23, 2020, this Court entered an Order [Docket No. 393] approving the retention of Morris James as counsel to the Committee, *nunc pro tunc* to June 11, 2020.

² The Committee members are the following: (i) Safelite Group, (ii) EDS Service Solutions, LLC, and (iii) Exultancy, Inc.

SERVICES PROVIDED BY MORRIS JAMES

9. Since its retention, Morris James, in its capacity as counsel for the Committee, undertook the following:

- Reviewed, revised, and filed and served, all papers filed by the Committee in these cases, including without limitation relating to the bidding procedures and sale schedule, and sale and plan support agreement;
- Reviewed substantially all of the papers filed by the Debtors and others in these cases;
- Prepared applications for compensation and/or reimbursement of expenses on behalf of Committee professionals and members;
- Attended Committee meetings, and responded to inquiries from individual creditors;
- Communicated with counsel to the Debtors, the United States Trustee, and lenders regarding issues, as necessary; and
- Attended hearings on behalf of the Committee.

MONTHLY APPLICATIONS

10. On April 16, 2021, Morris James filed its tenth monthly application for compensation and reimbursement of expenses [Docket No. 768] (the “Tenth Monthly Application”). By the Tenth Monthly Application, Morris James sought approval of compensation of \$7,559.50 and reimbursement of expenses in the amount of \$25.70 for the period of March 1, 2021 through May 31, 2021. On May 4, 2021, the Committee filed a certificate of no objection to the Tenth Monthly Application [Docket No. 791].

11. On May 17, 2021, Morris James filed its eleventh monthly application for compensation and reimbursement of expenses [Docket No. 817] (the “Eleventh Monthly Application”). By the Eleventh Monthly Application, Morris James sought approval of compensation of \$5,650.50 and reimbursement of expenses in the amount of \$30.30 for the period

of April 1, 2021 through April 30, 2021. On June 2, 2021, the Committee filed a certificate of no objection to the Eleventh Monthly Application [D.I. 832].

12. On June 16, 2021, Morris James filed its twelfth monthly application for compensation and reimbursement of expenses [Docket No. 849] (the “Twelfth Monthly Application”). By the Twelfth Monthly Application, Morris James sought approval of compensation of \$12,624.50 and reimbursement of expenses in the amount of \$13.70 for the period of May 1, 2021 through May 31, 2021. The Committee can file a certificate of no objection to the Eleventh Monthly Application on July 2, 2021.

13. The total sum due to Morris James for professional services rendered on behalf Committee during for the Interim Compensation Period is \$25,834.50. A chart detailing the fees in each of the applications during the Interim Compensation Period, by professional and by category is attached as **Exhibit A**. Morris James submits that the professional services it rendered on behalf of the Committee during this time were both reasonable and necessary.

14. Morris James incurred \$69.70 of expenses during the Interim Compensation Period. A chart detailing the specific disbursements during the Interim Compensation Period is attached hereto as **Exhibit B**.

15. The undersigned hereby attests that he has reviewed the requirements of Local Rule 2016-1 and this Application conforms to such requirements, including that travel time was not billed at more than half rate and copying charges were only \$.10 per page.

16. Attached as **Exhibit C** are the charts references in *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases*.

WHEREFORE, the Committee hereby requests pursuant to the procedures allowed in the

Administrative Compensation Order: (i) approval of allowance of interim compensation for necessary and valuable legal services rendered by Morris James to the Committee in the sum of \$25,834.50 and reimbursement of expenses in the sum of \$69.70 for the period from March 1, 2021 through May 31, 2021 on an interim basis; (ii) payment of any 20% holdback that was withheld from payment under the monthly fee application; and (iii) such other and further relief as is just and proper.

Dated: June 30, 2021

MORRIS JAMES LLP

/s/ Brya M. Keilson

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