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

In re:

ADVANTAGE HOLDCO, INC., et al.,

Debtors.<sup>1</sup>

Chapter 11

Case No. 20-11259 (CTG)

(Jointly Administered)

Objection Deadline: July 22, 2021 at 4:00 p.m. ET Hearing Date: August 2, 2021 at 10:00 a.m. ET

### FOURTH INTERIM FEE APPLICATION OF COLE SCHOTZ P.C. FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR <u>THE PERIOD FROM MARCH 1, 2021 THROUGH MAY 31, 2021</u>

Name of Applicant:	Cole Schotz P.C.
Authorized to provide professional services to:	Advantage Holdco, Inc., et al.
Date of Retention:	June 29, 2020 <i>nunc pro tunc</i> to May 26, 2020
Period for which Compensation and Reimbursement is Sought:	March 1, 2021 through May 31, 2021
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$358,408.00
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$718.21
This is a(n):	final application

<sup>&</sup>lt;sup>1</sup> 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.

Prior Applications Filed:

Application	Date Filed	Period Covered	Approved Fees	Approved Expenses
1 <sup>st</sup> Interim Application [D.I. 539]	10/8/2020	5/26/2020 – 8/31/2020	\$1,352,783.00	\$8,893.09
2 <sup>nd</sup> Interim Application [D.I. 665]	1/22/2021	9/1/2020 - 11/30/2020	\$370,484.50	\$4,156.73
3 <sup>rd</sup> Interim Application [D.I. 744]	3/30/2021	12/1/2020 – 2/28/2021	\$191,328.00	\$617.92

Monthly Apple	cation	Requeste and Exj		Fees and D Paid or To	-	Outstanding Holdback
Monthly Fee Period, Application DI No., and Date Filed	CNO DI No. and Date Filed	Total Fees Requested	Total Expenses Requested	Amount of Fees Paid or To Be Paid (80%)	Amount of Expenses Paid or To Be Paid (100%)	Amount of Fee Holdback Sought (20%)
3/1/21 – 3/31/21 D.I. 766; 4/16/21	D.I. 792 5/4/2021	\$154,240.50	\$195.43	\$123,392.40	\$195.43	\$30,848.10
4/1/21 – 4/30/21 D.I. 816; 5/17/21	D.I. 832 6/2/2021	\$97,328.50	\$103.88	\$77,862.80	\$103.88	\$19,465.70
5/1/21 – 5/31/21 D.I. 848; 6/15/21	D.I. [864] 7/1/2021	\$106,839.00	\$418.90	\$85,471.20	\$418.90	\$21,367.80
TOTALS		\$358,408.00	\$718.21	\$286,726.40	\$718.21	\$71,681.60

# SUMMARY OF FEES AND EXPENSES REQUESTED

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

In re:

ADVANTAGE HOLDCO, INC., et al.,

Debtors.<sup>1</sup>

Chapter 11

Case No. 20-11259 (CTG)

(Jointly Administered)

Objection Deadline: July 22, 2021 at 4:00 p.m. ET Hearing Date: August 2, 2021 at 10:00 a.m. ET

### FOURTH INTERIM FEE APPLICATION OF COLE SCHOTZ P.C. FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR <u>THE PERIOD FROM MARCH 1, 2021 THROUGH MAY 31, 2021</u>

Cole Schotz P.C. (the "<u>Applicant</u>" or "<u>Cole Schotz</u>"), counsel to Advantage Holdco, Inc.

and certain of its affiliates, the debtors and debtors-in-possession in the above-captioned cases

(collectively, the "Debtors"), submits this fourth interim fee application (the "Application"),

pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the

"Bankruptcy Code"), Rule 2016(a) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy

Rules"), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States

Bankruptcy Court for the District of Delaware (the "Local Rules"), and the Order Establishing

Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket

No. 372] (the "Interim Compensation Order"),<sup>2</sup> for allowance of compensation for professional

legal services rendered and reimbursement of actual and necessary expenses incurred for the period

from March 1, 2021 through May 31, 2021 (the "Interim Application Period"), and respectfully

represents as follows:

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Interim Compensation Order.

#### JURISDICTION AND VENUE

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

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code. Such relief is also warranted under Bankruptcy Rule 2016(a), Local Rule 2016-2, and the Interim Compensation Order.

#### **BACKGROUND**

#### A. The Chapter 11 Cases

3. On May 26, 2020 (the "<u>Petition Date</u>"), the Debtors each commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the "<u>Chapter 11</u> <u>Cases</u>"). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. A trustee has been appointed in the Chapter 11 Cases.

 On June 9, 2020, the United States Trustee for the District of Delaware (the "<u>U.S.</u> <u>Trustee</u>") filed the Notice of Appointment of Committee of Unsecured Creditors [Docket No. 140].

#### **B.** The Retention of Cole Schotz

5. On June 5, 2020, the Debtors applied [Docket No. 127] to the Court for an order authorizing the retention and employment of Cole Schotz as the Debtors' counsel, *nunc pro tunc* to May 26, 2020. On June 29, 2020, the Court entered an order (the "<u>Retention Order</u>") [Docket No. 306] authorizing such retention<sup>3</sup>.

<sup>&</sup>lt;sup>3</sup> As set forth in the Retention Order, Cole Schotz intends to make reasonable efforts to comply with the U.S. Trustee's request for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications* 

### C. The Interim Compensation Order

6. On July 22, 2020, the Court entered the Interim Compensation Order which sets forth the procedures for monthly and interim compensation and reimbursement of expenses in these Chapter 11 Cases [Docket No. 372]. Specifically, the Interim Compensation Order provides that a Retained Professional may file and serve a Monthly Fee Application on or after the fifteenth (15<sup>th</sup>) day of each calendar month for which compensation is sought seeking interim allowance of its fees and expenses for services rendered and reimbursement of expenses incurred during any preceding month. Provided that there are no objections to the Monthly Fee Application filed within fifteen (15) days after the service of a Monthly Fee Application, the Retained Professional may file a certificate of no objection with the Court, after which the Debtors are authorized to pay such Retained Professional eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such Monthly Fee Application. If an objection is filed to the Monthly Fee Application, then the Debtors are authorized to pay 80% of the fees and 100% of the expenses not subject to objection.

7. The Interim Compensation Order further provides that, at three-month intervals, a Retained Professional shall file and serve an application for interim approval and allowance of compensation and reimbursement of expenses sought by such Retained Professional in its Monthly Fee Applications, including any amounts requested in Monthly Fee Applications but yet unpaid, filed during the preceding three-month, interim period.

for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013, in connection with the interim and final fee applications to be filed by Cole Schotz in these Chapter 11 Cases.

#### **<u>RELIEF REQUESTED</u>**

8. By this Application, Applicant seeks interim approval and allowance of compensation in the amount of \$358,408.00 for professional services rendered, and reimbursement of actual and necessary expenses in the amount of \$718.21 incurred, during the Interim Application Period. Cole Schotz incorporates herein by reference each of its Monthly Fee Applications filed during the Interim Application Period together with the corresponding certifications of no objections.<sup>4</sup>

#### SUMMARY OF SERVICES

9. During the Interim Application Period, Cole Schotz worked closely with the Debtors and the Debtors' other professionals to achieve the Debtors' objectives. The following summary highlights the major areas in which Applicant rendered services to the Debtors during the Interim Application Period:

10. Asset Disposition, Sales, Uses, and Leases (Section 363) (56.1 hours; \$30,

362.50). This category includes time spent with respect to the private sale of the Debtors' Visa and Mastercard interchange fee claims. Cole Schotz professionals worked cooperatively with the Debtors' other professionals and the professionals for the Committee and the Debtors' DIP lender to (i) formulate appropriate bidding procedures, (ii) prepare form documents to be used as a template for potential bidders, (iii) address inquiries regarding the sale and communicate with the Debtors, prospective bidders, the Committee, and the Debtors' DIP lender regarding the same, (iv) analyze bids and identify the successful bidder, (v) finalize sale documents with the successful bidder, and (vi) prepare and file the motion to approve the sale.

<sup>&</sup>lt;sup>4</sup> *See* Docket Nos. 766 (Monthly Fee Application for March 2021), 792 (CNO for Monthly Fee Application for March 2021), 816 (Monthly Fee Application for April 2021), 832 (CNO for Monthly Fee Application for April 2021), 848 (Monthly Fee Application for May 2021), and [864] (CNO for Monthly Fee Application for May 2021).

#### Case 20-11259-CTG Doc 865 Filed 07/01/21 Page 8 of 20

11. <u>Case Administration</u> (33.5 hours; \$15,815.50). This category includes time spent on a number of different tasks necessary to comply with the requirements of this Court and the Bankruptcy Code, including without limitation, reviewing general case documents, reviewing and maintaining a case calendar, maintaining a critical dates chart, scheduling of hearings with the Court, responding to general case inquiries, conferencing with the Debtors regarding tasks, division of labor, and strategies, and other miscellaneous tasks not otherwise separately classifiable.

12. <u>Claims Analysis, Administration and Objections</u> (221.9 hours; \$137,775.50). This category includes, among other things, time spent (i) conducting legal research on the merits of claims, (ii) preparing and filing three omnibus claims objections to priority, secured, and administrative expense claims, and (iii) negotiating and preparing stipulations and agreements with adversaries to resolve various claims and claims objections.

13. <u>Fee Application Matters/Objections</u> (51.5 hours; \$17,241.50). This category includes time spent by Cole Schotz professionals and paraprofessionals in connection with the preparation of Cole Schotz's monthly and interim fee statements and fee applications. During the compensation period, these efforts included ensuring that the schedules attached to the monthly fee statements complied with the Fee Guidelines. To minimize costs in connection with this time-intensive process, Cole Schotz relied on paraprofessionals to prepare the initial drafts of the monthly fee statements and interim fee applications, thereby limiting the time spent by counsel on the review of fees, where reasonably practicable.

14. <u>Preference and Avoidance Actions</u> (22.3 hours; \$14,019.00). This category includes time spent conducting legal research and addressing potential preference claims against the Highway Toll Administration.

5

#### Case 20-11259-CTG Doc 865 Filed 07/01/21 Page 9 of 20

15. <u>Preparation for and Attendance at Hearings</u> (24.3 hours; \$10,278.00). This category includes time spent preparing for hearings, including reviewing documents and conferencing with the Debtors' management and counsel for the Committee and the Debtors' DIP lender regarding hearings, and communicating with parties-in-interest with respect to the status of matters scheduled for hearing.

16. <u>Reorganization Plan</u> (163.50 hours; \$102,292.00). This category includes time spent (i) reviewing and revising a draft combined plan and disclosures statement and various plan exhibits, (ii) conferring with the Debtors' management and other professionals and counsel to the Committee and the Debtors' DIP lender regarding the draft combined plan and disclosures statement and various plan exhibits; and (iii) preparing, in cooperation with the Committee and the Debtors' DIP lender, the motion to approve solicitation procedures and related solicitation documents.

### THE INTERIM FEE APPLICATION AND COMPLIANCE WITH GUIDELINES

17. This Application was prepared in accordance with (a) Local Rule 2016-2, (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 "<u>UST Guidelines</u>"), and (c) the Interim Compensation Order (collectively with Local Rule 2016-2 and the UST Guidelines, the "<u>Guidelines</u>").

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

19. Applicant provides the following responses to the questions set forth under  $\P$  C.5

of Appendix B of the UST Guidelines:

<u>Question</u>: 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.

<u>Question</u>: 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?

<u>Response</u>: The fees sought in this Interim Fee Application are not more than 10% of what was budgeted.

<u>Question</u>: 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.

<u>Question</u>: 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.

<u>Question</u>: 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.

<u>Question</u>: Does this fee application include rate increases since retention?

<u>Response</u>: Yes. As disclosed in Cole Schotz' retention application, its hourly rates are subject to periodic adjustments to reflect economic and other conditions and increase in a professional's level of experience. Consistent with its standard practice, Cole Schotz increased its hourly rates on or about September 1, 2020. *See* Applicant's Notice of Increase of the Hourly Rates of Professionals, filed January 15, 2021 [Docket No. 653].

### **REASONABLE AND NECESSARY SERVICES**

20. The services for which Applicant seeks compensation were, at the time rendered,

necessary for, beneficial to, and in the best interests of the Debtors' estates. 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

#### Case 20-11259-CTG Doc 865 Filed 07/01/21 Page 11 of 20

section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Applicant is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

#### **NOTICE**

21. Pursuant to the Interim Compensation Order, this Application is being served upon the Fee Notice Parties and notice of the hearing on the Application is being served on all parties that have requested notice in the Chapter 11 Cases pursuant to Bankruptcy Rule 2002.

WHEREFORE, Cole Schotz respectfully requests the Court enter an order (a) approving the Application; (b) awarding Cole Schotz compensation for the Interim Application Period in the amount of \$358,408.00 and reimbursement for actual and necessary expenses in the amount of \$718.21; (c) authorizing the payment of such sums to Cole Schotz pursuant to the Interim Compensation Order; and (d) granting such other and further relief as the Court may deem just and proper.

Dated: July 1, 2021 Wilmington, Delaware

#### COLE SCHOTZ P.C.

/s/ Andrew J. Roth-Moore Norman L. Pernick (No. 2290) Justin R. Alberto (No. 5126) Patrick J. Reilley (No. 4451) Andrew J. Roth-Moore (No. 5988) 500 Delaware Avenue, Suite 1410 Wilmington, Delaware 19801 Telephone: (302) 652-3131 Facsimile: (302) 652-3131 Facsimile: (302) 652-3117 npernick@coleschotz.com jalberto@coleschotz.com aroth-moore@coleschotz.com - and -

Stuart Komrower (admitted *pro hac vice*) Court Plaza North P.O. Box 800, 25 Main Street Hackensack, New Jersey 07601 Telephone: (201) 489-3000 Facsimile: (201) 489-1536 skomrower@coleschotz.com

Counsel for Debtors and Debtors in Possession

#### CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES

The aggregate hourly rate for all Cole Schotz Delaware and New Jersey non-bankruptcy timekeepers (including both attorneys and paralegals) (the "<u>Non-Bankruptcy Blended Rate</u>") for the year ending December 31, 2020 (the "<u>Comparable Period</u>") was \$485.34 per hour, and the aggregate hourly rate for all Cole Schotz Delaware and New Jersey bankruptcy timekeepers (including both attorneys and paralegals) (the "<u>Bankruptcy Blended Rate</u>") for the Comparable Period was \$568.45 per hour.

The blended hourly rate for all Cole Schotz timekeepers (including both attorneys and paralegals) who provided services to the Debtors during the Application Period was approximately \$568.45 per hour.

Category of Timekeeper	2020 Bankruptcy Blended Rate	2020 Non-Bankruptcy Blended Rate	Application Period Blended Rate
Member	\$608.00	\$601.00	\$833.96
Special Counsel	\$685.00	\$495.00	N/A
Associate	\$343.00	\$351.00	\$466.32
Paralegal	\$286.00	\$256.00	\$314.94
Aggregate	\$523.00	\$487.00	\$568.45 <sup>1</sup>

<sup>&</sup>lt;sup>1</sup> The blended rate is the actual blended rate during the Application Period and includes "other" timekeepers specifically categorized in the Summary of Timekeepers.

### SUMMARY OF TIMEKEEPERS INCLUDED IN INTERIM FEE APPLICATION MARCH 1, 2021 THROUGH MAY 31, 2021

Name of Professional Person	Date of Bar Admission	Position with the Applicant and Number of Years in that Position	Hourly Billing Rate <sup>2</sup>	Total Billed Hours	Total Compensation
Norman L. Pernick	1985	Member (Bankruptcy) (since 2008)	\$1,025.00	67.3	\$68,982.50
Justin R. Alberto	2008	Member (Bankruptcy) (since 2020)	\$645.00	30.3	\$19,543.50
Patrick J. Reilley	2003	Member (Bankruptcy) (since 2011)	\$640.00	15.3	\$9,792.00
Stuart Komrower	1984	Member (Bankruptcy) (since 1992)	\$855.00	0.6	\$513.00
Roger M. Iorio	2002	Member (Corporate) (since 2005)	\$690.00	5.9	\$4,071.00
Daniel F. Geoghan	1999	Member (Bankruptcy) (since 2005)	\$690.00	18.4	\$12,696.00
David Bass	1994	Member (Bankruptcy) (since 2006)	\$825.00	75.6	\$62,370.00
Andrew Roth-Moore	2013	Associate (Bankruptcy) (since 2020)	\$500.00	284.5	\$142,250.00
Jack Dougherty	N/A	Associate (Bankruptcy) (since 2020)	\$225.00	28.5	\$6,412.50
Michael Fitzpatrick	N/A	Law Clerk (Bankruptcy) (since 2020)	\$225.00	11.2	\$2,520.00
Larry Morton	N/A	Paralegal (Bankruptcy) (since 2020)	\$315.00	91.8	\$28,917.00

 $<sup>^2</sup>$  The rate represents the regular hourly rate for each attorney and paraprofessional who rendered legal services. All hourly rates are adjusted by Applicant on a periodic basis (the last such adjustment occurred on September 1, 2020).

Jennifer L. Ford	N/A	Paralegal (Bankruptcy) (since 2019)	\$300.00	0.4	\$120.00
Pauline Z. Ratkowiak	N/A	Paralegal (Bankruptcy) (since 2008)	\$315.00	0.7	\$220.50
Total Incurred				630.5	\$358,408.00
			Total Requested C	compensation	\$358,408.00
			Total Attorney C	ompensation	\$329,150.50
			Blended Rate	All Attorneys	\$612.26
			Blended Rate All	Timekeepers	\$568.45

# In re Advantage Holdco, Inc., *et al.* Case No. 20-11259 (JTD) (Bankr. D. Del.)

## STAFFING PLAN FOR COLE SCHOTZ P.C. MARCH 1, 2021 – MAY 31, 2021

Category of Timekeeper	Estimated Number of Timekeepers	Average
	Expected to Work on Matter	Hourly Rate
	During the Budget Period	
Members	6	\$745.00
Associates	4	\$320.00
Paralegals	2	\$300.00
	Estimated Blended Hourly Rate	\$600.00

# Case 20-11259-CTG Doc 865 Filed 07/01/21 Page 17 of 20

### BUDGET FOR COLE SCHOTZ P.C. MARCH 1, 2021 – MAY 31, 2021

Project Category	Budgeted Hours	<b>Budgeted Fees</b> (estimated blended rate of \$600)
Asset Analysis and Recovery	5	\$3,000.00
Asset Dispositions, Sales, Uses, and Leases (Section 363)	50	\$30,000.00
Automatic Stay Matters/Litigation	25	\$15,000.00
Bank Claims and Litigation Matters	0	\$0.00
Budgeting (Case)	1	\$600.00
Business Operations	1	\$600.00
Case Administration	30	\$18,000.00
Cash Collateral and DIP Financing	0	\$0.00
Claims Analysis, Administration and Objections	250	\$150,000.00
Committee Matters and Creditor Meetings	0	\$0.00
Creditor Inquiries	5	\$3,000.00
Disclosure Statement/Voting Issues	25	\$15,000.00
Document Review	0	\$0.00
Document Review/Committee Investigation	0	\$0.00
Employee Matters	0	\$0.00
Executory Contracts	5	\$3,000.00
Fee Application Matters/Objections	25	\$15,000.00
General Corporate Advice	0	\$0.00
Leases (Personal Property and Financing)	0	\$0.00
Leases (Real Property)	5	\$3,000.00
Litigation/Gen. (Except Automatic Stay Relief)	25	\$15,000.00
Preferences and Avoidance Actions	25	\$15,000.00
Preparation for and Attendance at Hearings	25	\$15,000.00
Reorganization Plan	175	\$105,000.00
Reports; Statements and Schedules	10	\$6,000.00
Retention Matters	0	\$0.00
Tax / General	5	\$3,000.00
U.S. Trustee Matters and Meetings	5	\$3,000.00
Utilities/Sec. 366 Issues	0	\$0.00
Vendor Matters	0	\$0.00
Total Incurred (Estimate)	697	\$418,200.00

# SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY MARCH 1, 2021 THROUGH MAY 31, 2021

Project Category	Budgeted Hours	Budgeted Fees (estimated blended rate of \$600.00)	Total Hours	Total Fees
Asset Analysis and Recovery	5	\$3,000.00	3.1	\$1,550.00
Asset Dispositions, Sales, Uses, and	50	¢20.000.00	56.1	\$30,362.50
Leases (Section 363)	50	\$30,000.00		
Automatic Stay Matters/Litigation	25	\$15,000.00	18.2	\$11,331.00
Bank Claims and Litigation Matters	0	\$0.00	0.4	\$410.00
Budgeting (Case)	1	\$600.00	0.0	\$0.00
Business Operations	1	\$600.00	0.0	\$0.00
Case Administration	30	\$18,000.00	33.5	\$15,815.50
Cash Collateral and DIP Financing	0	\$0.00	1.1	\$868.00
Claims Analysis, Administration and Objections	250	\$150,000.00	221.9	\$137,775.50
Committee Matters and Creditor Meetings	0	\$0.00	0.0	\$0.00
Creditor Inquiries	5	\$3,000.00	0.5	\$279.00
Disclosure Statement/Voting Issues	25	\$15,000.00		-
Document Review	0	\$0.00	0.0	\$0.00
Document Review/Committee Investigation	0	\$0.00	0.0	\$0.00
Employee Matters	0	\$0.00	0.0	\$0.00
Executory Contracts	5	\$3,000.00	8.5	\$7,941.50
Fee Application Matters/Objections	25	\$15,000.00	51.5	\$17,241.50
General Corporate Advice	0	\$0.00	0.0	\$0.00
Leases (Personal Property and Financing)	0	\$0.00	0.0	\$0.00
Leases (Real Property)	5	\$3,000.00	0.0	\$0.00
Litigation/Gen. (Except Automatic Stay Relief)	25	\$15,000.00	20.9	\$6.110.50
Preferences and Avoidance Actions	25	\$15,000.00	22.3	\$14,019.00
Preparation for and Attendance at Hearings	25	\$15,000.00	24.3	\$10,278.00
Reorganization Plan	175	\$105,000.00	163.5	\$102,292.00
Reports; Statements and Schedules	10	\$6,000.00	1.6	\$954.00
Retention Matters	0	\$0.00	0.0	\$0.00
Tax / General	5	\$3,000.00	1.1	\$550.00
U.S. Trustee Matters and Meetings	5	\$3,000.00	2.0	\$630.00
Utilities/Sec. 366 Issues	0	\$0.00	0.0	\$0.00
Vendor Matters	0	\$0.00	0.0	\$0.00
Total Incurred	697	\$418,200.00	630.5	\$358,408.00
Total Requested:	697	\$418,200.00	630.5	\$358,408.00

### SUMMARY OF EXPENSE REIMBURSEMENT BY CATEGORY MARCH 1, 2021 THROUGH MAY 31, 2021

Expense Category	Service Provider (if applicable)	Total Expenses
Photocopying/Printing/Scanning		\$288.00
Conference Calls	CourtCall	\$5.89
Court Fees		\$144.70
Filing Fees		\$188.00
Online Research		\$91.62
TOTAL		\$718.21

SUMMARY OF INTERIM	I FEE APPLICATION
Name of Applicant	Cole Schotz P.C.
Name of Client	Advantage Holdco, Inc., et al.
Fee period covered by Interim Fee Application	March 1, 2021 – May 31, 2021
Total compensation sought during Fee Period	\$358,408.00
Total expenses sought during Fee Period	\$718.21
Petition Date	May 26, 2020
Retention Date	June 29, 2020 nunc pro tunc to May 26, 2020
Date of order approving employment	June 29, 2020
Total compensation approved by interim order to date	\$1,914,595.50
Total expenses approved by interim order to date	\$13,667.74
Total allowed compensation paid to date	\$1,914,595.50
Total allowed expenses paid to date	\$13,667.74
Blended rate in Interim Fee Application for all Attorneys	\$612.26
Blended rate in Interim Fee Application for all Timekeepers	\$562.45
Compensation sought in this Interim Fee Application	\$201,255.20
already paid pursuant to a monthly compensation order	
but not yet allowed	
Expenses sought in this Interim Fee Application already paid	\$299.31
pursuant to a monthly compensation order but not yet allowed	
Number of professionals included in this	13
Interim Fee Application	
If applicable, number of professionals in this Interim Fee	1
Application not included in staffing plan	
If applicable, difference between fees budgeted and	Budgeted: \$418,200.00
compensation sought for this Fee Period	Actual: \$358,408.00
Number of professionals billing fewer than 15 hours	5
to the case during this Fee Period:	
Are any rates higher than those approved or disclosed at	All rates set forth set forth in this Interim Fee
retention? If yes, calculate and disclose the total compensation	Application were disclosed in Applicant's Notice of
sought in this Interim Fee Application using the rates originally	Increase of the Hourly Rates of Professionals, filed
disclosed in the retention application:	January 15, 2021 [Docket No. 653]