

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

<hr style="border: 0.5px solid black;"/> <p>In re:</p> <p>Advantage Holdco, Inc., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p> <hr style="border: 0.5px solid black;"/>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Chapter 11</p> <p>Case No. 20-11259 (CTG)</p> <p>Jointly Administered</p> <p>Hearing Date: TBD</p> <p>Objection Deadline: October 21, 2021 at 4:00 p.m. (ET)</p>
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**SUMMARY OF COMBINED FIFTEENTH MONTHLY AND FIFTH INTERIM
APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES OF
CBIZ ACCOUNTING TAX AND ADVISORY OF NEW YORK, LLC AS FINANCIAL
ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE PERIOD FROM JUNE 1, 2021 THROUGH AUGUST 31, 2021**

Name of Applicant:	CBIZ Accounting Tax and Advisory of New York, LLC (“ <u>CBIZ</u> ”)
Authorized to Provide Professional Services to:	The Official Committee of Unsecured Creditors
Date of Retention:	Effective as of June 15, 2020 by order entered on July 23, 2020
Period for which Compensation and Reimbursement is Sought:	August 1, 2021 through August 31, 2021 (the “ <u>Fifteenth Monthly Application Period</u> ”)
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$468.00
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$0.00
Total Amount of Fees and Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$468.00

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.

Period for which Compensation and Reimbursement is Sought: June 1, 2021 through August 31, 2021 (the “Fifth Interim Application Period”)

Amount of Compensation Sought as Actual, Reasonable and Necessary: \$4,985.50

Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: \$0.00

Total Amount of Fees and Expense Reimbursement Sought as Actual, Reasonable and Necessary: \$4,985.50

This is a: X monthly X interim final application.

Date Filed	Period Covered	Requested		CNO	Paid to Date		Total Unpaid
		Fees	Expenses	Date Filed	Fees	Expenses	Fees & Expenses
August 16, 2021 [D.I.#902]	June 1 – July 31, 2021	\$4,517.50	\$0.00	September 1, 2021 [D.I.#919]	\$3,614.00	\$0.00	\$903.50
September 30, 2021	August 1 – August 31, 2021	\$468.00	\$0.00	n/a	\$0.00	\$0.00	\$468.00
		\$4,985.50	\$0.00		\$3,614.00	\$0.00	\$1,371.50

Monthly Billing Summary

This is the combined fifteenth monthly and fifth interim application filed in these cases.

CBIZ PROFESSIONALS

Name of Professional Individual	Position of the Applicant	Hourly Billing Rate	Total Hours Billed	Total Compensation
Esther DuVal	Managing Director	\$800	2.3	\$1,840.00
Scott Prol	Senior Manager	\$385	4.4	\$1,694.00
Lauren Berret	Manager	\$395	2.7	\$1,066.50
Gerard D'Amato	Manager	\$385	1.0	\$385.00
	Total		10.4	\$4,985.50
Blended Rate		\$479.38		

COMPENSATION BY CATEGORY

Project Categories	Total Hours	Total Fees
Teleconferences / Meetings – UCC / Counsel	2.9	\$1,905.00
Plan and Disclosure Statement	6.1	\$2,375.50
Fee Applications (monthly)	1.4	\$705.00
Total	10.4	\$4,985.50

EXPENSE SUMMARY

Expense Category	Description	Total Expenses
<i>No expenses</i>		\$0.00
Total Expenses		\$0.00

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

In re:) Chapter 11
)
Advantage Holdco, Inc., <i>et al.</i> , ¹) Case No. 20-11259 (CTG)
) Jointly Administered
)
Debtors.) Hearing Date: TBD
) Objection Deadline: October 21, 2021 at 4:00 p.m. (ET)

**COMBINED FIFTEENTH MONTHLY AND FIFTH INTERIM APPLICATION FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES OF CBIZ ACCOUNTING
TAX AND ADVISORY OF NEW YORK, LLC AS FINANCIAL ADVISOR TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM
JUNE 1, 2021 THROUGH AUGUST 31, 2021**

Pursuant to sections 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 372], entered on July 15, 2020 (the “Administrative Order”), CBIZ Accounting Tax and Advisory of New York, LLC (the “Firm”), financial advisor for the Official Committee of Unsecured Creditors (the “Committee”), hereby submits its Combined Fifteenth Monthly and Fifth Interim Application for Compensation and for Reimbursement of Expenses for the Period from June 1, 2021 through August 31, 2021 (the “Application”).

By this Application, CBIZ seeks an interim allowance of (i) compensation in the amount of \$468.00 and actual and necessary expenses in the amount of \$0.00 for the period August 1, 2021 (the “Fifteenth Monthly Application”) and (ii) interim compensation in the amount of \$4,985.50

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.

and actual and necessary expenses in the amount of \$0.00 for a total allowance of \$4,985.50 for the period June 1, 2021 through August 31, 2021 (the “Fifth Interim Application”).

Pursuant to Local Bankruptcy Rule 2016-2, this Application is supported by the Certification of Esther DuVal, which is annexed hereto as Exhibit A. In support of this Application, CBIZ respectfully represents as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this Application pursuant to 28 U.S.C. § 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2) and may be determined by the Bankruptcy Court.

2. The statutory predicates for the relief requested herein are sections 328, 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2014-1 and 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”).

BACKGROUND

3. On May 26, 2020 (the “Petition Date”), the above-captioned jointly administered debtors (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.

4. The Debtors are operating their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in

these cases by the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”).

5. On June 9, 2020, the U.S. Trustee appointed the Committee, consisting of the following three members: (i) Safelite Group, (ii) EDS Service Solutions, LLC, and (iii) Exultancy, Inc.

6. That same day, the Committee selected Baker & Hostetler LLP as its lead counsel, on June 11, 2020 selected Morris James LLP as its Delaware counsel, and on June 15, 2020 selected CBIZ Accounting, Tax and Advisory of New York, LLC (“CBIZ”) as its financial advisor.

7. On July 15, 2020, the Court entered the Administrative Order, authorizing the Committee’s professionals (“Professionals”) to submit applications for interim compensation and reimbursement of expenses, pursuant to the procedures specified therein. The Administrative Order provides, among other things, that a Retained Professional shall file their applicable interim fee applications on or before the thirtieth (30th) day following the end of each Interim Fee Period. Objections are due within twenty-one (21) days after service of the interim fee application.

8. The retention of CBIZ, as financial advisor to the Committee, was approved effective as of June 15, 2020, by this Court's *Order Authorizing Official Committee of Unsecured Creditors to Employ CBIZ Accounting Tax and Advisory of New York, LLC as Financial Advisor nunc pro tunc to June 15, 2020* [D.I. 394], entered on July 23, 2020 (the “Retention Order”). The Retention Order authorized CBIZ to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

**CBIZ'S APPLICATION FOR COMPENSATION AND
FOR REIMBURSEMENT OF EXPENSES**

Compensation Paid and Its Source

9. All services for which CBIZ requests compensation were performed for or on behalf of the Committee.

10. CBIZ has received no payment and no promises for payment from any source other than the estate for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between CBIZ and any other person other than the employees of CBIZ for the sharing of compensation to be received for services rendered in these cases. CBIZ has not received a retainer in this matter.

Fee Application

11. CBIZ seeks allowance of compensation and payment for professional services rendered to the Committee during the Combined Fifteenth Monthly and Fifth Interim Application Period in the aggregate amount of \$4,985.50 and for reimbursement of expenses incurred in connection with the rendition of such services in the aggregate amount of \$0.00.

12. Included in this Application is a request for approval and payment of compensation of \$468.00 and reimbursement of expenses in the amount of \$0.00 for the period August 1, 2021 to August 31, 2021 (the "Fifteenth Monthly Application").

13. Attached as Exhibit B is an invoice which includes a list of professionals providing services; their respective billing rates; the aggregate hours expended by each professional; a general description of services rendered, summarized by project category; a fee summary; detailed time records with a description of the services performed by each professional and time expended during the Fifteenth Monthly Application Period.

Summary of Services

14. The employees of CBIZ who have rendered professional services during the Combined Fifteenth Monthly and Fifth Interim Fee Application Period in these cases are as follows: Esther DuVal, Scott Prol, Lauren Berret, and Gerard D'Amato.

15. During the Combined Fifteenth Monthly and Fifth Interim Fee Application Period, the Committee relied heavily on the experience and expertise of the above-named persons in dealing with matters described in detail below. As a result, CBIZ's highly skilled restructuring and bankruptcy professionals devoted significant time and effort to perform properly and expeditiously the required professional services.

SUMMARY OF FEES AND EXPENSES

16. The Application covers CBIZ's fees and expenses incurred during the Combined Fifteenth Monthly and Fifth Interim Application Period. The fees incurred total \$4,985.50 and the expenses incurred total \$0.00. These fees and expenses are consistent with CBIZ's arrangement with the Committee and the terms of the Retention Order. CBIZ respectfully submits that if necessary, a consideration of these factors would result in this Court's allowance of the full compensation requested.

17. *Time and expertise required.* CBIZ's professional services on behalf of the Committee have required 10.4 hours of professional time in this Combined Fifteenth Monthly and Fifth Interim Application Period. CBIZ has staffed this case efficiently. Where work could be performed by professionals with lower rates, CBIZ used such professionals to perform the assignments. A significant amount of the services rendered required a high degree of professional competence and expertise. For those services, CBIZ used senior professionals in the interest of staffing the case efficiently.

18. *The skill required to perform the financial advisory services properly.* These bankruptcy cases address issues which raise complex questions. The cases require a high level of skill and expertise to efficiently and accurately analyze assets available for recovery by sale of the litigation claims and provide comments on the Debtors' estimated waterfall in connection with the Plan and Disclosure Statement, among other things, during these chapter 11 proceedings.

19. *The amount involved and results obtained.* CBIZ has been prudent in the amount of time incurred on various tasks and believes its efforts benefited the Committee and these cases.

20. *The fee.* Pursuant to the terms of the Retention Order, CBIZ will bill at their standard hourly rates.

RESERVATION

21. To the extent time or disbursement charges for services rendered or disbursements incurred relate to this Combined Fifteenth Monthly and Fifth Interim Application Period but were not processed prior to the preparation of this Application, or CBIZ has for any other reason not sought compensation or reimbursement of expenses herein for any services rendered or expenses incurred during the Combined Fifteenth Monthly and Fifth Interim Application Period, CBIZ reserves the right to request additional compensation for such services and reimbursement of expenses in a future application.

NOTICE

22. Pursuant to the Interim Compensation Order, this Application is being served on: (a) the Debtors, (b) counsel to the Debtors, (c) counsel to the Debtors' prepetition secured lender, (d) the U.S. Trustee, and (e) all parties that have requested notice pursuant to Local Rule 2002-1. The Applicant submits that no other or further notice need be provided.

CONCLUSION

23. It is respectfully submitted that the amount requested by CBIZ is fair and reasonable given (a) the complexity of the issues presented, (b) the time and labor required, (c) the skill necessary to perform the financial advisory services, (d) the preclusion of other employment, and (e) the customary fees charged to clients in bankruptcy and non-bankruptcy situations.

WHEREFORE, CBIZ respectfully requests (a) that it be allowed on an interim basis (i) fees in the amount of \$4,985.50 for reasonable, actual and necessary services rendered by it on behalf of the Committee during the Combined Fifteenth Monthly and Fifth Interim Application Period and (ii) reimbursement of \$0.00 for reasonable, actual and necessary expenses incurred during the Combined Fifteenth Monthly and Fifth Interim Application Period; (b) that the Debtors be authorized and directed to immediately pay to CBIZ NY the amount of \$1,371.50 which equates to the sum of 100% of CBIZ NY's fees and expenses incurred during the Combined Fifteenth Monthly and Fifth Interim Application Period that are unpaid¹, and (c) granting such other and further relief as this Court may deem just and proper.

Dated: September 30, 2021

CBIZ Accounting Tax and Advisory of New
York, LLC

By: /s/ Esther DuVal
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New York, NY 10018
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*Financial Advisor to the Official Committee of
Unsecured Creditors*

¹ Total fees incurred during the Combined Fifteenth Monthly and Fifth Interim Application Period were \$4,985.50.