

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

In re:

NOBLE HOUSE HOME FURNISHINGS LLC,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-90773 (CML)

(Jointly Administered)

**FIRST SUPPLEMENTAL DECLARATION OF MARK HADDAD IN SUPPORT OF  
THE DEBTORS' APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING  
THE EMPLOYMENT AND RETENTION OF FLATIRON LAW GROUP LLP  
AS SPECIAL CORPORATE COUNSEL FOR THE DEBTORS,  
EFFECTIVE AS OF THE PETITION DATE**

(Related Docket Nos. 95 & 184)

I, Mark Haddad, declare under penalty of perjury that the following is true and correct:

1. I am a partner with the law firm of Flatiron Law Group LLP ("Flatiron" or the "Firm"), special corporate counsel to the above-captioned debtors and debtors in possession (collectively, the "Debtors"). I am duly admitted to practice law in the States of New York and Connecticut.

2. I am authorized to submit this first supplemental declaration (this "Supplemental Declaration") on behalf of Flatiron in connection with the *Debtors' Application For Entry Of An Order Authorizing The Employment And Retention Of Flatiron Law Group LLP As Special Corporate Counsel For The Debtors, Effective As Of The Petition Date* [Docket No. 95] and my initial declaration (the "Initial Declaration") filed in support thereof.<sup>2</sup> On October 25, 2023, the Court entered that certain *Order Authorizing the Retention and Employment of*

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification numbers, are: Noble House Home Furnishings LLC (1671); Best Selling Home Decor Furniture, LLC (5580), Le Pouf, LLC (8197), NH Services LLC (9626), and Heavy Metal, Inc. (3124). The Debtors' service address in these Chapter 11 cases is 700 Milam Street, Suite 1300, Houston, TX 77002.

<sup>2</sup> A capitalized term used but not defined herein shall have the meaning ascribed to it in the Initial Declaration.

*Flatiron Law Group LLP as Special Corporate Counsel for the Debtors, Effective as of the Petition Date* [Docket No. 184] (the “Retention Order”).

3. I submit this Supplemental Declaration in accordance with, *inter alia*, paragraph 7 of the Retention Order, which provides, “To the extent that the Firm hires any contractors, the Firm shall not charge a markup to the Debtors with respect to fees billed by contractors who are hired by the Firm to provide services to the Debtors and shall ensure that any such contractors are subject to conflict checks and disclosures in accordance with the requirements of the Bankruptcy Code and Bankruptcy Rules. ”

4. Except as otherwise noted, I have personal knowledge of the matters set forth herein. Certain of the disclosures set forth herein relate to matters not within my personal knowledge, but rather within the personal knowledge of other attorneys and employees at Flatiron or MinterEllison LLP (“Minter”) and are based on information derived from Minter’s internal records provided by them to me.

5. Since the entry of the Retention Order, Flatiron, as the Debtors’ special corporate counsel, has enlisted the services of Mintner, and principally George Tong thereof, as Hong Kong based contract attorneys to assist with facilitating the transfer of certain of the Debtors’ assets in Hong Kong in connection with the sale of substantially all of the Debtors’ assets, as previously approved by the Bankruptcy Court. *See* Docket No. 199.

6. In accordance with the terms of the Retention Order, Flatiron previously provided to Minter a list received from the Debtors of the names of parties-in-interest in the above-referenced chapter 11 cases, which is attached hereto as **Schedule 1** (the “Parties List”).

7. I understand that Minter has investigated its connections to the parties identified on Schedule 1 through a full and thorough review of its computer database, which contains the

names of clients and other parties in interest in particular matters. I further understand that Minter 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 its 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. Based on such search, Minter disclosed the following:

8. Minter has disclosed that it previously acted for or is currently acting for certain parties set out in the Parties List, but its representation of such parties has no relationship with the transactions referred to in paragraph 5 above. Minter has confirmed that it will not be adverse to the Debtors on the matters that it is employed as contract counsel to Flatiron.

9. Except as provided for herein, Minter has informed me that its is not presently aware of any adverse interest or other connection with the Debtors, their creditors, the U.S. Trustee, or any party in interest herein in the matters for which they will be assisting the Debtors through Flatiron, subject to the general disclosures in the Initial Declaration, which are incorporated herein by reference as applicable to Minter.

10. Based on all of the foregoing, Minter informs me that it does not represent any entity having an adverse interest in connection with these cases on the matter on which they will be assisting the Debtors as contract attorneys to Flatiron. I have informed Minter of its obligation to continue to monitor its connections to the Debtors, their creditors and other parties in interest in these cases, and it has agreed to do so. If any additional relationships are discovered or arise which are not disclosed herein or in the Initial Declaration, Flatiron will file an appropriate supplemental disclosure with the Court.

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

Dated: November 17, 2023

/s/ Mark Haddad

Mark Haddad

**Exhibit 1**

**(Parties in Interest List)**

**List of Potential Parties in Interest<sup>1</sup>**

Parties-in-Interest Reviewed for Current and Recent Former Relationships

**SCHEDULE 1**

<b>Category</b>	<b>Parties-in-Interest</b>
Debtors	Noble House Home Furnishings LLC Best Selling Home Décor Furniture, LLC Le Pouf, LLC NH Services LLC Heavy Metal, Inc.
Former Names/dbas of Debtors	NFusion OkiOki GDFStudio (dba for Noble House Home Furnishings LLC) UpFurnish (dba for Noble House Home Furnishings LLC) Laurel & Pine (dba for Noble House Home Furnishings LLC)
Non-Debtors	NH Retail Alpha LLC Noble House Home Furnishings Canada Inc. Noble House Assurance, LLC Noble House Home Furnishings (MY) Sdn.Bhd Fujian Baimei Electronic Commerce Co., Ltd Baimei (Fujian) Network information Technology Co., Ltd Noble House Home Furnishings UK Limited Noble House Home Furnishings, S.De R.L. De C.V. Noble House Home Furnishings (HK) Limited Noble House Home Furnishings Vietnam Company Limited
Bankruptcy Professionals	Pachulski Stang Ziehl & Jones LLP Epiq Global Riveron Consulting Lincoln Partners Advisors LLC Flatiron Law Group LLP
Banks/Lender/UCC Lien Parties/Administrative Agents	Wells Fargo Bank, National Association BAL Global Finance Canada Corporation Bank of America Leasing & Capital, LLC PNC Bank National Association, as Agent

<sup>1</sup> This list (and the categories contained herein) are for purposes of a conflicts check and should not be relied upon by any party as a list of creditors or for any other purpose. As listing a party once allows our conflicts specialists to run a check on such party, we have attempted to remove duplicate entries where possible. Accordingly, a party that otherwise would fall under multiple categories is likely to be listed under only one category.

Contract Parties	7901 Deering – 2003 GP ACJG Inc AMB Milton Crossings 2, L.P. AMD/NDP Local L.P. Advertise Purple Applied Data Consultants, Inc. dba Elite Extra Attentive Mobile Inc. Autodesk Brand Knew LLC Brightpearl Inc. 4X Commerce LLC (dba MyFBAPrep) Fulfilment & Storage UK Limited Unified Network Information Services Canon Financial Services, Inc. CeligoQ CH Robinson Worldwide, Inc. Christopher Knight Brands, LLC Commerce Technologies, LLC dba CommerceHub CRI Raymond Leasing Corporation Amazon.com Services LLC CF Capital, LLC C.H. Robinson Worldwide, Inc. Classic Home Costco Wholesale Costco Wholesale Canada Ltd. Costco de Mexico SA.de CV Cymax Stores DEV Property NJ LLC Ecloud Valley Technology (HK ) Limited FedEx Trade Networks Transport & Brokerage (Canada), Inc. FedEx Transportation Services P3 Ventures, LLC/English Elm GCC Long Beach LLC GLC El Monte LLC Gnosis Freight GS1 US Hilton Pasadena Home Depot Home Depot Product Authority, LLC Home Threads, LLC Houzz Shop LLC Isabel Investments, L.P. Keystone Investigative Services, Inc., LinkedIn LJ&L Enterprises, LLC Loblaw Marketplace Lowe's Companies Canada, ULC Loyalty Logistics Co. MaestroQA, Inc.
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	Marshall Bernes Family Trust MSC Mediaterranean Shipping Company SA Mulberry Technology Inc. Narvar, Inc. Nebraska Furniture Mart, Inc. Only Home United, a UK Limited Liability Company Orkin Pest Control Overstock.com, Inc. Pacific/Youngman – Woodland Hills Packsize, LLC Prologis Targeted U.S. Logistics Fund, L.P. Renin Corp. US Roark Ventures, LLC Salsify Selective 21314 Lassen, LLC Shopify Inc. Signifyd, Inc. S.O. Savannah One, LLC Sprout Social SPS Commerce, Inc. Superior Chatsworth, LLC Target Vendor Income TikTok Inc. tymeshift Inc. United Parcel Services Canada Ltd. United Parcel Service, Inc. Vending One Inc. Wal-Mart Canada Corp. Wal-Mart.com USA, LLC Wan Hai Lines, Ltd. Wan Hai Lines Singapore Wayfair LLC Wayfair Stores LTD WMCV Phase 1 SPE, LLC Yotpo Zendesk
Current Board of Directors	Marshall R. Bernes Siew King Tham Kean Jin Ooi Josh Dannett Matthew Mazdyasni Craig Barbarosh Melissa Gelbart
Current Officers	Marshall R. Bernes Gayla Bella Kean Jin Ooi Josh Dannett Melissa Gelbart
Insurance Providers/Insurance Brokers	Marsh & McLennan Agency LLC Underwriters at Lloyd's London National Casualty Company



	Philadelphia Indemnity Insurance Co. Old Republic Insurance Company Illinois Union Insurance Company Hartford Fire Insurance Company Maxum Indemnity Company Federal Insurance Company Morris & Garritano / Bella Mgmt Landlord held policy Harco National Insurance Company Continental Casualty Company
Parties to Litigation	Brand Knew Partners Personnel - Management Services Computer Reps, Inc. Ryan Weirich Susan Banuelos Dominique Parker Pacific Youngman DEV Property NJ LLC
Top 30 Unsecured Creditors	Ha Thanh Import-Export Company Limited Jiang Su Chairone Home Furniture Co., Ltd. Phu Tai Joint Stock Company Wegman's Furniture Industries Suzhou Shushi Furniture Co. Ltd Eco Tech Co., Ltd Vinafor Danang Wood Processing Enterprise Grand Universe Investment Ltd. Fedex 19 Forestry Joint Stock Company Bazhou Hongjiang Furniture Co. Ltd Fujian Anxi Jiafu Handicrafts Co. Ltd. Haining Zhenyi Furniture Co. Ltd King Import & Export Trade Co. Limited Anji Qianghong Furniture Co, Ltd A-IHome Furniture Ltd Forest Products Export Joint-Stock Company Of Quangnam Caoxian Mu Si Te Crafts Co. Ltd Tongxiang Jason Import & Export Co. Ltd Kingston Industry Vietnam Ltd Hao Mei Limited (HK) Cam Ha Joint-Stock Company Hangzhou Changshun Furniture Co. Ltd. Xin Jian Hardware Limited Anji Yiyuan Furniture Co. Ltd. Anxi Future Star Crafts Co. Ltd Hangzhou Hengzhijie Import And Export Co. Ltd. Pudong Prime Int'l Logistics, Inc Lion International Logistics (HK) Co. Limited Ningbo Mayard Outdoor Products Co. Ltd

Credit Card Companies	American Express Travel Related Services Company, Inc. Bank of America, National Association
Individuals Who Signed Credit Card Agreements	Gayla Bella Marshall Bernes John Petuoglu Ryan Weirich
Other Parties	Allan W Ralston Alliance Air Freight, Inc Ares Commercial Finance LP Brian Puccinelli Marbella & Ricardo Vargas Pacific Coast Commercial Prologis Management LLC Ron Demars
Governmental Units	Los Angeles County Tax Collector SBC Tax Collector
Judges & the Office of the US Trustee for the Southern District of Texas	Chief Judge Eduardo V. Rodriguez Judge Christopher M. Lopez Judge David R. Jones Judge Jeffrey P. Norman Judge Marvin Isgur Alethea Caluza Alicia Barcomb Brian Henault Christopher R. Travis Christy Simmons Clarissa Waxton Glenn Otto Gwen Smith Ha Nguyen Hector Duran Ivette Gerhard Jana Whitworth Jayson B. Ruff Linda Motton Luci Johnson-Davis Millie Aponte Sall Samantha Chilton Stephen Statham Yasmine Rivera
Buyer of Debtors' Assets	GigaCloud Technology, Inc.