

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

In re:

NOBLE HOUSE HOME FURNISHINGS LLC,¹

Debtors.

Chapter 11

Case No. 23-90773 (CML)

(Jointly Administered)

**MONTHLY FEE STATEMENT OF FLATIRON LAW GROUP LLP
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF
EXPENSES AS FINANCIAL ADVISORS TO THE DEBTORS AND
DEBTORS IN POSSESSION FOR THE PERIOD FROM
SEPTEMBER 11, 2023 THROUGH SEPTEMBER 30, 2023**

Pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses For Professionals* [Docket No. 185] (the “Compensation Order”) entered by the Court on October 25, 2023, Flatiron Law Group LLP (“Flatiron”), special corporate counsel to the above-captioned debtors and debtors in possession (collectively the “Debtors”), submits this monthly statement of services rendered and expenses incurred in this case for the period from September 11, 2023 through September 30, 2023 (the “Statement Period”).

I. Itemization of Services Rendered by Flatiron:

1. The following is a list of individuals and their respective titles that provided services during the Statement Period. It includes information regarding their respective billing rates and the total number of hours spent by each individual providing services during the Statement Period for which Flatiron seeks compensation.

¹ 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.

Name	Position / Dept.	Hourly Rate	Hours	Total Compensation
Mark A. Haddad	Partner	\$725.00	60.3	\$43,717.50
Leonard T. Naura	Partner	\$725.00	2.1	\$1,522.50
TOTALS			62.4	\$45,240.00

2. The time records of Flatiron consisting of a daily breakdown of the time spent by each person on each day and detail as to the disbursements incurred are attached as **Exhibit A** to this Monthly Fee Statement.

II. Itemization of Services Rendered and Disbursements Incurred By Category

3. The following itemization presents the services rendered by Flatiron by task categories and provides a summary of disbursements incurred by category of expense disbursement.

A. Services Rendered

4. The following services were rendered in the following task categories:

Task Category	Hours	Fees Earned
Corporate	61.5	\$44,587.50
Retention/Comp	.9	\$652.50
TOTALS	62.4	\$45,240.00

5. A detailed itemization of the services rendered in each of the above task categories is set forth in **Exhibit A**.

B. Expenses Incurred

6. The expenses incurred by Flatiron for this Statement are as follows:

Expense Category	Total Expenses
TOTAL	\$0.00

7. Accordingly, the amount of compensation and expenses payable for this Statement Period is **\$36,192.00**, which is calculated as follows:

Total Fees for Services Rendered During Statement Period:	\$45,240.00
Twenty Percent (20%) Holdback:	<u>(\$9,048.00)</u>
Total Fees Less Holdback:	\$36,192.00
Expenses Incurred (100%):	<u>\$0.00</u>
TOTAL	<u>\$36,192.00</u>

WHEREFORE, pursuant to the Compensation Order, Flatiron requests payment of compensation in the amount of (i) \$36,192.00 (80% of \$45,240.00) on account of actual, reasonable and necessary professional services rendered to the Debtors by Flatiron and (ii) reimbursement of actual and necessary costs and expenses in the amount of \$0.00 incurred on behalf of the Debtors by Flatiron.

Dated: January 24, 2024

FLATIRON LAW GROUP LLP

/s/ Mark A. Haddad

Mark A. Haddad
500 Fashion Avenue, 8th Floor
New York, NY 10018
Telephone: (646) 350-3601
mhaddad@flatiron.legal

*Special Corporate Counsel to the Debtors and
Debtors in Possession*

EXHIBIT A

(September 11, 2023 – September 30, 2023 Invoice)

FLATIRON LAW GROUP LLP
500 Fashion Avenue, FL8
New York, NY 10018
Phone: (646) 350-3600

Bill to:

Noble House Home Furnishings LLC
21325 Superior Street
Chatsworth, CA 91311

Invoice
Invoice Date: # 10577
9/30/2023

Date	Lawyer	Task/Matter	Service Summary	Hours	Rate	Amount
09/12/23	MAH	Corporate	Review G. Bella emails re bank accounts (.1) and confer with M Gelbart on pending employee and vendor litigation (.5).	0.6	725	435.00
09/12/23	MAH	Corporate	Review / comment presentation first day hearing presentation (.7), telephone calls with general counsel and BK counsel (1.1) and attend first day hearing (SDTX Judge Lopez), (.9), confer with client.	2.7	725	1,957.50
09/12/23	MAH	Corporate	Review and markup litigation disclosure schedule and confer with M. Gelbart (.7), review revised draft DIP facility (.4), markup closing list closing (.3), prepare/revise perfection certificate (.6), coordinate Canada counsel (.2), prepare/markup ABL schedules and GSA Schedules and circulate (3.1) call with M. Litvak re DIP loan schedules (.1).	5.4	725	3,915.00
09/12/23	MAH	Corporate	Review revised APA and markup schedules (.4), produce documents for due diligence preparation call (.5).	0.9	725	652.50
				9.6		6,960.00
09/13/23	MAH	Corporate	Review/markup special transaction committee resolutions (.5), revise DIP loan consents and draft secretary certificates for debtors, redrafts and arrange execution with multiple followups (4.2) and confer with Pachulski (.2).	4.9	725	3,552.50
09/13/23	MAH	Corporate	Review KERP motion and confer with client re same.	0.8	725	580.00
09/13/23	MAH	Corporate	DIP facility closing - review financing statements and new lien searches (.6), confer internally on Flatiron art 9 opinion (.5), finalize ABL and GSA schedules and perfection certificates and multiple followups with client (4.2), update closing list (.2), emails with lender counsel, Canadian counsel and BK counsel (.5), calls with client (G Bella and M Gelbart) (.3)	6.3	725	4,567.50
	MAH	Corporate	Review tax files and answer client questions w/r/t HMI trusts.	0.8	725	580.00
09/13/23	MAH	Corporate	Review emails, answer questions and circulate requested documents, review file and confer with M. Gelbart re NJ and RW litigation and CH garnishment.	0.7	725	507.50
09/13/23	MAH	Retention/Comp	Confer with BK counsel re firm retention.	0.2	725	145.00
09/13/23	MAY	Corporate	Confer with T. Kapour re first day motions (.2), review motions (.7).	0.9	725	652.50
				14.6		10,585.00
09/14/23	MAH	Corporate	DIP facility closing - coordinate with client (M. Gelbart, G. Bella and J. Dannnett) to finalize dip loan schedules and GSA schedules and other deliverables (1.1), review UCC filings and coordinate lien searches (.4), coordinate with Canadian counsel and BK counsel (.6), respond to emails (.5).	2.6	725	1,885.00
09/14/23	MAH	Corporate	Updated APA schedules (.9), review and respond to emails (.5) and coordinate with Riveron (.2) and client (.4).	2.0	725	1,450.00
09/14/23	MAH	Corporate	Confer with client re special transactions committee.	0.3	725	217.50
09/14/23	MAH	Retention/Comp	Review invoice status.	0.2	725	145.00
09/14/23	MAH	Corporate	Confer with client re KERP motion, research.	0.3	725	217.50
09/14/23	MAH	Corporate	Review vendor contracts (.3), review Bof A lease and schedules and answer questions (.4) and confer with client (.2)	0.9	725	652.50
09/14/23	MAH	Corporate	Review Epig contract and first day posting.	0.4	725	290.00
				6.7		4,857.50
09/15/23	MAH	Corporate	DIP facility post closing deliverables, including completion of fully compiled secretary certificates for all debtors (1.5), confer with client re same (.2), call with Teddy Kapur (.3).	2.0	725	1,450.00
09/16/23	MAH	Corporate	Assist post-closing deliverables, multiple follow-ups and calls with client.	0.4	725	290.00
09/16/23	MAH	Corporate	Prepared consents confirming officer appointments to support Flatiron due authorization opinion (.6), organize shared board of managers folder (.3), circulate consents (.1), telcon with GC (.2).	0.9	725	652.50
				1.3		942.50
09/18/23	MAH	Corporate	Respond to emails and document requests (1.1), LePouf amendment (.4), confer with T Kapur re re NH Retail dissolution (.2) .	1.6	725	1,160.00
09/18/23	MAH	Corporate	Review revised APA, confer with client re closing preparations.g deliverables.	0.6	725	435.00
09/18/23	MAH	Corporate	Review cash management motion.	0.2	725	145.00
09/18/23	MAH	Corporate	Review and inputs to update the DIP budget (.3), review G Bella emails (.1)	0.4	725	290.00
09/18/23	MAH	Corporate	Review litigation status, including NHRA and employee cases, and markup the schedule.	0.3	725	217.50
				3.1		2,247.50

FLATIRON LAW GROUP LLP

500 Fashion Avenue, FL8
New York, NY 10018
Phone: (646) 350-3600

Bill To:

Noble House Home Furnishings LLC
21325 Superior Street
Chatsworth, CA 91311

Invoice # 10577
Invoice Date: 9/30/2023

Date	Lawyer	Task/Matter	Service Summary	Hours	Rate	Amount
09/19/23	MAH	Corporate	Obtain NHRA corporate papers and proof of dissolution from DE SOS and client and circulate to BK counsel and client (.6), confer with client and counsel / answer questions (.3).	0.9	725	652.50
09/19/23	MAH	Corporate	Review UST request and materials and confer with client (.5), advice on BOL notation and review ABL covenant and research files (.9).	1.4	725	1,015.00
09/19/23	MAH	Retention/Comp	Review and comment on Flatiron retention application and draft order.	0.2	725	145.00
09/19/23	MAH	Corporate	Review cash management stipulation and BK wage motion and consent and confer with client re same (.6), hearing on Bid Procedures SDTX - Judge Lopez (.5).	1.1	725	797.50
09/19/23	MAH	Corporate	Prepare board consents and board materials (1.0), answer questions about structure (.2), coordinate work of corporate service provider (.2), communicate with client and counsel re committees (.3).	1.7	725	1,232.50
				<u>5.3</u>		<u>3,842.50</u>
09/20/23	MAH	Retention/Comp	Review and comment on retention application (.3), confer with T Kapur re same (.1).	0.4	725	290.00
09/20/23	MAH	Corporate	Review NJ lease case files (.3), confer with BK counsel re litigation claims and potential claims (.2), communicate with client (.1); review stay motions (.1).	0.7	725	507.50
09/20/23	MAH	Corporate	Examine NY Art 8 and 9 on perfection and priority (.6) and review federal bills of lading act and art 7 UCC (.8).	1.4	725	1,015.00
09/20/23	MAH	Corporate	Review closing steps and preparations with client (.3), review current drafts of APA and sale notices (.2), review emails re missing truck equipment and recovery (.1).	0.6	725	435.00
				<u>3.1</u>		<u>2,247.50</u>
09/21/23	MAH	Corporate	Review/markup FLG retention motion.	0.2	725	145.00
09/21/23	MAH	Corporate	Review kerp motion and consents, confer with client.	0.2	725	145.00
09/21/23	MAH	Corporate	Circulate consents, draft minutes and other requested corporate materials (.7), organize client files (recreate client drive not available) (2.2), communicate with client re committee (.2)	3.1	725	2,247.50
09/21/23	MAH	Corporate	Email BK counsel re notice of bankruptcy filing in NJ lease case, review case file.	0.3	725	217.50
				<u>3.8</u>		<u>2,755.00</u>
09/22/23	MAH	Retention/Comp	Review revised retention application, confer with T Kapur.	0.3	725	217.50
09/22/23	MAH	Corporate	Multiple followups on consents (.9), assist client / upload document to VDR (.4).	1.3	725	942.50
09/22/23	MAH	Corporate	Review notice of BK filing in NJ lease lawsuit and confer with BK counsel re same (.5), review / respond to emails (.2).	0.7	725	507.50
				<u>2.3</u>		<u>1,667.50</u>
09/25/23	MAH	Corporate	Review / markup NJ lawsuit notice of stay filing, confer with L Nuara re same.	0.3	725	217.50
09/25/23	LTN	Corporate	IC with Mark Haddad regarding need to notify court of bankruptcy filing (.2); review & revise notice of pendency of bankruptcy (.8); contact and discuss with adversary regarding bankruptcy filing and automatic stay (.5).	1.5	725	1,087.50
				<u>1.8</u>		<u>1,305.00</u>
09/26/23	LTN	Corporate	Obtain filed copy of Notice of Bankruptcy, transmittal to BK counsel, IC with M Haddad.	0.3	725	217.50
09/26/23	MAH	Corporate	Review Notice of Bankruptcy and confer with L Nuara re same.	0.1	725	72.50
09/26/23	MAH	Corporate	Prepare draft UCC Art 9 perfection and enforceability opinion and circulate to Morgan Lewis (5.9), confer with CA counsel re CA opinions (.7) related due diligence and memo to file (1.4) including multiple followups with G Bella re control accounts (.5) and perfection and assistance in closing PAC West accounts (.3).	8.4	725	6,090.00
				<u>8.8</u>		<u>6,380.00</u>
				<u>62.4</u>		<u>45,240.00</u>
Total Hours						
Total Fees						

Summary by Lawyer

LTN	2.1		
MAH	60.3		
Total	<u>62.4</u>	725	<u>45,240.00</u>