

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

IN RE:

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC,

Case No. 6:24-bk-02486-GER

RED LOBSTER RESTAURANTS LLC,  
RLSV, INC.,  
RED LOBSTER CANADA, INC.,  
RED LOBSTER HOSPITALITY LLC,  
RL KANSAS LLC,  
RED LOBSTER SOURCING LLC,  
RED LOBSTER SUPPLY LLC,  
RL COLUMBIA LLC,  
RL OF FREDERICK, INC.,  
RED LOBSTER OF TEXAS, INC.,  
RL MARYLAND, INC.,  
RED LOBSTER OF BEL AIR, INC.,  
RL SALISBURY, LLC,  
RED LOBSTER INTERNATIONAL HOLDINGS LLC,

Jointly Administered with  
Case No. 6:24-bk-02487-GER  
Case No. 6:24-bk-02488-GER  
Case No. 6:24-bk-02489-GER  
Case No. 6:24-bk-02490-GER  
Case No. 6:24-bk-02491-GER  
Case No. 6:24-bk-02492-GER  
Case No. 6:24-bk-02493-GER  
Case No. 6:24-bk-02494-GER  
Case No. 6:24-bk-02495-GER  
Case No. 6:24-bk-02496-GER  
Case No. 6:24-bk-02497-GER  
Case No. 6:24-bk-02498-GER  
Case No. 6:24-bk-02499-GER  
Case No. 6:24-bk-02500-GER

Debtors.

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**APPLICATION OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS TO RETAIN AND EMPLOY PACHULSKI  
STANG ZIEHL & JONES LLP AS LEAD COUNSEL EFFECTIVE AS OF JUNE 3, 2024**

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**NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST FOR HEARING**

If you object to the relief requested in this paper you must file a response with the Clerk of Court at the George C. Young Federal Courthouse, 400 W. Washington Street, Suite 5100, Orlando, FL 32801, within (14) days from the date of the attached proof of service, plus an additional three days if this paper was served on any party by U.S. Mail.

If you file and serve a response within the time permitted, the Court will either notify you of a hearing date or the Court will consider the response and grant or deny the relief requested in this paper without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, and the Court may grant or deny the relief requested without further notice or hearing.

**You should read these papers carefully and discuss them with your attorney if you have one. If the paper is an objection to your claim in this bankruptcy case, your claim may be reduced, modified, or eliminated if you do not timely file and serve a response.**

The Official Committee of Unsecured Creditors (the “Committee”) of Red Lobster Management LLC and its affiliated debtors (collectively, the “Debtors”) hereby submits its application (the “Application”), pursuant to sections 328 and 1103 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2002-4 of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida (the “Local Rules”), and consistent with the *Guidelines for Reviewing Applications 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* (the “Revised UST Guidelines”) and the *Procedure Manual for the United States Bankruptcy Court for the Middle District of Florida* (the “Procedure Manual”), for the entry of an order authorizing and approving the employment of Pachulski Stang Ziehl & Jones LLP (“PSZ&J” or the “Firm”) as lead counsel to the Committee in connection with the Debtors’ jointly-administered chapter 11 cases (the “Chapter 11 Cases”), effective as of June 3, 2024. In support of the Application, the Committee submits (i) the declaration of Bradford J. Sandler, a partner of the Firm, attached hereto as **Exhibit A** (the “Sandler Declaration”), and (ii) the declaration of Jennifer Heeringa of Gordon Food Services Canada Ltd., one of the Committee’s Co-Chairs, attached hereto as **Exhibit B** (the “Heeringa Declaration” and, together with the Sandler Declaration, the “Declarations”), each of which are incorporated herein by reference. In further support of the Application, the Committee respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
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 predicates for the relief requested herein are sections 328 and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2002-4.

### **BACKGROUND**

4. On May 19, 2024 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Middle District of Florida (the “Court”), thereby commencing these Chapter 11 Cases. The Debtors are authorized to continue operating their businesses and managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Debtors’ Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1. *See* Docket No. 62. No trustee or examiner has been appointed in these Chapter 11 Cases.

5. On May 31, 2024, the Office of the United States Trustee (the “U.S. Trustee”) appointed the Committee pursuant to section 1102 of the Bankruptcy Code. The Committee consists of the following nine (9) members: (i) Warner Bros. Discovery, Inc. (Co-Chair); (ii) Realty Income Corporation (Co-Chair); (iii) Gordon Food Service Canada Ltd. (Co-Chair); (iv) Kenneth O. Lester Company, Inc. d/b/a Performance Food Group; (v) PepsiCo Sales, Inc.; (vi) George Parker; (vii) Credera Enterprises Company, LLC; (viii) Rubin Postaer and Associates; and (ix) Provender Hall I, LLC, Provender Hall IV, LLC. *See* Docket No. 250.

6. On June 3, 2024, the Committee held a meeting and, among other things, voted to retain PSZ&J as its lead counsel, subject to this Court’s approval. Thereafter, on June 4, 2024, the Committee selected Pack Law, P.A. (“Pack Law”) to serve as its Florida counsel and Genesis Credit Partners (“Genesis”) to serve as its financial advisor in these Chapter 11 Cases.

7. The Firm's retention is requested as of June 3, 2024, insofar as that is the date the Committee first requested PSZ&J to render legal services on behalf of the Committee, and the Firm has been actively advising the Committee since that date.

**RELIEF REQUESTED**

8. By this Application, the Committee respectfully requests that the Court enter an order, substantially in the form annexed hereto as **Exhibit C** (the "Proposed Order"), pursuant to sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2002-4, authorizing the Committee to employ and retain PSZ&J as its lead counsel in these Chapter 11 Cases effective as of June 3, 2024.

9. The Committee has selected PSZ&J as its lead counsel in furtherance of the efficient representation of the Committee in these Chapter 11 Cases. The Committee seeks to retain PSZ&J effective as of June 3, 2024, because the Firm began providing services to the Committee as of such date. The Committee believes that such retention is appropriate in these Chapter 11 Cases because the Committee required effective representation immediately upon its appointment, and the Firm has been providing services to the Committee since June 3, 2024.

**PSZ&J'S QUALIFICATIONS AND SERVICES TO BE RENDERED**

10. The Committee seeks to retain PSZ&J as lead counsel because of the Firm's extensive experience and knowledge in the field of debtors' and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code. PSZ&J has approximately eighty-five (85) attorneys with a practice concentrated on corporate reorganizations, bankruptcy, litigation, and commercial matters. The Firm's attorneys have comprehensive experience representing creditors' committees, debtors, creditors, trustees, and others in a wide variety of bankruptcy cases. Attorneys of the Firm have extensive experience representing creditors' committees in complex chapter 11 cases in districts throughout the country, including in the cases of *Hornblower Holdings LLC, et al.*, *Number Holdings, Inc.*,

*Unconditional Love Inc., AN Global, LLC, Big Village Group Holding LLC, Agway Farm & Home Supply, LLC, Alamo Drafthouse Cinemas Holdings, LLC, YouFit Health Clubs, LLC, Lucky Brand Dungarees, LLC, Art Van Furniture, LLC, CraftWorks Parent, LLC, Surgalign Holdings, Inc., Cyxtera Communications, LLC, Bed Bath & Beyond Inc., and Party City Holdco Inc.* Based on these facts, the Committee believes that the Firm is well-qualified to render the services described below.

11. Subject to further order of this Court, the Firm is expected to render, among other services, the following services to the Committee:

- a. advise the Committee with respect to its rights, duties, and powers in these Chapter 11 Cases;
- b. assist and advise the Committee in its consultations with the Debtors relative to the administration of these Chapter 11 Cases;
- c. assist the Committee in analyzing the claims of the Debtors' creditors and the Debtors' capital structure and in negotiating with holders of claims;
- d. assist the Committee in its investigation of the acts, conduct, assets, liabilities, and financial condition of the Debtors and of the operation of the Debtors' businesses;
- e. assist the Committee in its analysis of, and negotiations with, the Debtors or any third-party concerning matters related to, among other things, the assumption or rejection of leases of nonresidential real property and executory contracts, asset dispositions, financing or other transactions, and the terms of one or more plans of reorganization for the Debtors and accompanying disclosure statements and related plan documents;
- f. assist and advise the Committee in communicating with unsecured creditors regarding significant matters in these Chapter 11 Cases;
- g. represent the Committee at hearings and other proceedings;
- h. review and analyze applications, orders, statements of operations, and schedules filed with the Court and advise the Committee as to their propriety;
- i. assist the Committee in preparing pleadings and applications as may be necessary in furtherance of the Committee's interests and objectives;
- j. prepare, on behalf of the Committee, any pleadings, including without limitation, motions, memoranda, complaints, adversary complaints, objections or comments in connection with any of the foregoing; and

- k. perform such other legal services as may be required or requested or as may otherwise be deemed in the interests of the Committee in accordance with the Committee's powers and duties as set forth in the Bankruptcy Code, Bankruptcy Rules or other applicable law.

12. PSZ&J will coordinate closely with Genesis and Pack Law to minimize the duplication of the services provided to the Committee by each professional and meet the scope of the services that each firm is retained to provide.

**NO ADVERSE INTEREST AND DISCLOSURES REGARDING CONNECTIONS**

13. The Committee believes that PSZ&J does not hold or represent any interest that is adverse to the Committee and the Debtors' estates and does not hold or represent any interest adverse to and has no connection with the Committee, the Debtors, the Debtor's creditors, or any party in interest herein in the matters upon which PSZ&J is to be retained, except as set forth in the Sandler Declaration and subject to PSZ&J's ongoing conflicts review.

14. To the best of the Committee's knowledge, and based upon the Sandler Declaration attached hereto, neither the Firm nor any of its attorneys have any connection with any party in interest, their attorneys or accountants, other than as set forth in the Sandler Declaration.

15. To the best of the Committee's knowledge, except as provided in the Sandler Declaration, neither the Firm, nor any of its attorneys represent any interest adverse to that of the Committee in the matters on which they are to be retained.

16. The Committee submits that its proposed employment of PSZ&J is in the best interests of the Committee and its members.

17. While the Firm has undertaken, and continues to undertake, efforts to identify connections with the Debtors and other parties in interest, it is possible that connections with some parties in interest have not yet been identified. Should the Firm, through its continuing efforts or as

these Chapter 11 Cases progress, learn of any new connections of the nature described above, the Firm will promptly file supplemental declarations, as required by Bankruptcy Rule 2014(a).

18. PSZ&J represents many debtors and committees in other bankruptcy cases, and those debtors, the members of those committees, or those estates may be creditors of the Debtors. However, the Firm will not represent any of those debtors, committees, or their members with respect to any claims that they may have collectively or individually against the Debtors.

19. Similarly, PSZ&J may represent, or may have represented, debtors, creditors' committees, or trustees in cases or proceedings against creditors of the Debtors that are unrelated to these Chapter 11 Cases.

### **PROFESSIONAL COMPENSATION**

20. Subject to Court approval and in accordance with section 330(a) of the Bankruptcy Code and any applicable orders of this Court, compensation will be payable to PSZ&J on an hourly basis at PSZ&J's standard hourly rates pursuant to section 328(a) of the Bankruptcy Code, plus reimbursement of actual, necessary expenses and other charges incurred by the Firm. PSZ&J's current standard hourly rates for professionals and paralegals are as follows:

<b>Partners</b>	\$995 - \$2,175 per hour
<b>Of Counsel</b>	\$975 - \$1,675 per hour
<b>Associates</b>	\$650 - \$1,075 per hour
<b>Paraprofessionals</b>	\$545 - \$595 per hour

21. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions, and such changes will be noticed in accordance with the Local Rules and/or practice.

22. The hourly rates set forth above are PSZ&J's standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate the Firm for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. It is the Firm's policy to charge its

clients in all areas of practice for all other expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, telephone and telecopier toll and other charges, mail and express mail charges, special or hand delivery charges, document retrieval, photocopying charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by the Firm to outside copying services for use in mass mailings, expenses for "working meals," computerized research, transcription costs, as well as non-ordinary overhead expenses such as secretarial and other overtime. PSZ&J will charge the Committee for these expenses in a manner and at rates consistent with charges made generally to the Firm's other clients and the rules and requirements of this Court. The Firm believes that it is more appropriate to charge these expenses to the clients incurring them than to increase the hourly rates and spread the expenses among all clients.

23. The Committee, subject to the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the Procedure Manual, and further orders of this Court, proposes to pay PSZ&J its customary hourly rates for services rendered that are in effect from time to time, as set forth above and in the Sandler Declaration, and to reimburse PSZ&J according to its customary reimbursement policies and the Committee submits that such rates are reasonable.

#### **NOTICE**

24. The Committee will provide notice of this Application to: (i) the U.S. Trustee, (ii) counsel to the Debtors, and (iii) all parties who have filed and served requests for notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Committee submits that no other or further notice need be given.

#### **NO PRIOR REQUEST**

25. No previous request for the relief sought herein has been made to this Court or any other court.



**WHEREFORE**, the Committee respectfully requests the entry of the Proposed Order, authorizing the Committee to employ and retain PSZ&J as lead counsel effective as of June 3, 2024, and granting such other and further relief as is just and proper.

Dated: July 3, 2024

The Official Committee of Unsecured Creditors  
of Red Lobster Management, LLC, *et al.*

Gordon Food Service Canada Ltd.

/s/ Jennifer Heeringa

Jennifer Heeringa  
North American Director of Credit

acting solely in its capacity as Co-Chair of  
the Official Committee of Unsecured Creditors  
of Red Lobster Management, LLC, *et al.*

***Submitted by:***

**PACK LAW**

51 Northeast 24th Street, Suite 108  
Miami, Florida 33137  
Telephone: (305) 916-4500

By: /s/ Joseph A. Pack

Joseph A. Pack  
Email: joe@packlaw.com  
Florida Bar No. 117882  
Jessey J. Krehl  
Email: jessey@packlaw.com  
Florida Bar No. 1025848

*Proposed Local Counsel to the Official  
Committee of Unsecured Creditors*

*Filer's Attestation: Pursuant to Local Rule 1001-2(g)(3) regarding signatures, Joseph A. Pack, Esq. attests that concurrence in the filing of this paper has been obtained.*

**Exhibit A**

**Sandler Declaration**

**UNITED STATES BANKRUPTCY COURT  
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ORLANDO DIVISION**  
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Case No. 6:24-bk-02500-GER

Debtors.

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**DECLARATION OF  
BRADFORD J. SANDLER IN SUPPORT OF THE  
APPLICATION OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS TO RETAIN AND EMPLOY PACHULSKI  
STANG ZIEHL & JONES LLP AS LEAD COUNSEL EFFECTIVE AS OF JUNE 3, 2024**

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I, Bradford J. Sandler, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner with the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZ&J” or the “Firm”), with an address of 780 Third Ave., 34th Floor, New York, NY 10017. I am duly admitted to practice law in the States of New York, Delaware, and Pennsylvania and have been admitted *pro hac vice* in these Chapter 11 Cases.

2. I am authorized to submit this declaration (the “Declaration”) in support of the

*Application of the Official Committee of Unsecured Creditors to Retain and Employ Pachulski Stang Ziehl & Jones LLP as Lead Counsel Effective as of June 3, 2024* (the “Application”), which is being submitted concurrently herewith.<sup>1</sup>

3. The Firm has approximately 85 attorneys with a practice concentrated on corporate reorganizations, bankruptcy, litigation, and commercial matters. PSZ&J’s attorneys have comprehensive experience representing creditors’ committees, debtors, creditors, trustees, and others in a wide variety of bankruptcy cases. Attorneys of the Firm have extensive experience representing creditors’ committees in complex chapter 11 cases in districts throughout the country, including in the cases of *Hornblower Holdings LLC, et al., Number Holdings, Inc., Unconditional Love Inc., AN Global, LLC, Big Village Group Holding LLC, Agway Farm & Home Supply, LLC, Alamo Drafthouse Cinemas Holdings, LLC, YouFit Health Clubs, LLC, Lucky Brand Dungarees, LLC, Art Van Furniture, LLC, CraftWorks Parent, LLC, Surgalign Holdings, Inc., Cyxtera Communications, LLC, Bed Bath & Beyond Inc., and Party City Holdco Inc.* Accordingly, PSZ&J is well-qualified to render the services described below.

4. Neither I, the Firm, nor any partner, of counsel or associate thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors, or any other parties in interest herein, or their respective attorneys and accountants, the U.S. Trustee, or any person employed in the Office of the United States Trustee (the “U.S. Trustee”) or any Bankruptcy Judge currently serving on the United States Bankruptcy Court for the Middle District of Florida, except as set forth herein.

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

### **DISCLOSURE OF CONNECTIONS**

5. Section 1103(b) of the Bankruptcy Code does not impose the general “disinterestedness” standard of section 327(a) of the Bankruptcy Code. However, Bankruptcy Rule 2014 requires that an application for employment under section 1103 disclose all connections with the Debtors, their estates, professionals, and the U.S. Trustee. Therefore, PSZ&J discloses its known connections herein.

6. The Firm has made the following investigation of its disinterestedness as part of its retention as counsel to the Committee. The Firm has undertaken a full and thorough review of its computer database, which contains the names of clients and other parties in interest in particular matters. The Firm 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 the Firm’s 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. In particular, an employee of the Firm, under my supervision, entered the names of the parties set forth on **Schedule 1** attached hereto in the Firm’s database with respect to the Firm’s conflict check in these Chapter 11 Cases.

7. Based on the Firm’s ongoing conflict check within its database, and out of an abundance of caution, the Firm provides the following disclosures which do not result in conflict:

- a. PSZ&J currently advises, and has advised in the past, Kenneth O. Lester Company, Inc. d/b/a Performance Food Group and/or its affiliates (collectively, “PFG”), identified by the Debtors as one of their creditors and a member of the Committee. PSZ&J does not represent PFG in connection with these Chapter 11 Cases.

8. PSZ&J represented, represents, and in the future will likely represent committees in matters unrelated to the Debtors and these Chapter 11 Cases, whose members may be creditors or committee members in these Chapter 11 Cases. However, the Firm is not representing any of those entities in these Chapter 11 Cases and will not represent any members of these committees with respect to any claims that they may have collectively or individually against the Debtors.

9. PSZ&J and certain of its partners, of counsel, and associates represented, represent, and in the future will likely represent creditors of the Debtors in connection with matters unrelated to the Debtors and these Chapter 11 Cases. For the avoidance of doubt, the Firm does not and will not represent any such parties in these Chapter 11 Cases.

10. PSZ&J has represented, represents, and in the future will likely represent debtors, creditors, and creditors' committees in cases unrelated to the Debtors and these Chapter 11 Cases wherein one or more of the firms representing the Debtors or other parties in interest serve or will serve as professionals. The Firm has previously worked with, currently works with, and will continue to work with some or all such professionals, as well as professionals retained by other parties in interest in these Chapter 11 Cases, on various representations in other cases, at times representing the same parties and at other times representing parties with similar interests or parties with adverse interests.

11. If at any time during the course of these Chapter 11 Cases, the Firm learns of any representation which may give rise to a conflict, the Firm will promptly file with the Court an amended or supplemental declaration identifying and specifying such involvement, as required by Bankruptcy Rule 2014(a).

12. PSZ&J is continuing to conduct an ongoing review of its files to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new material facts,

connections, or relationships are discovered or arise, PSZ&J will supplement its disclosure to the Court.

### **COMPENSATION**

13. The Firm has not received any retainer or payment from the Debtors or the Committee. Nor has the Firm received any promise of payment in connection with these Chapter 11 Cases. No compensation has been paid or promised to be paid from a source other than the Debtors' estates in these Chapter 11 Cases. No promises have been received by the Firm nor by any attorneys thereof as to compensation in connection with these Chapter 11 Cases, other than in accordance with the provisions of the Bankruptcy Code. The Firm has no agreement with any other entity to share with such entity any compensation received by the Firm in connection with these Chapter 11 Cases, except among the partners, of counsel, and associates of the Firm. Neither the Committee nor its members (or any of their representatives) are or will be liable for fees or costs incurred by the Firm in its representation of the Committee.

14. Subject to Court approval in accordance with section 330(a) of the Bankruptcy Code and any applicable orders of this Court, compensation will be payable to PSZ&J on an hourly basis at PSZ&J's standard hourly rates pursuant to section 328(a) of the Bankruptcy Code, plus reimbursement of actual, necessary expenses and other charges incurred by PSZ&J. PSZ&J's current standard hourly rates for professionals and paralegals are as follows:

<b>Partners</b>	\$995 - \$2,175 per hour
<b>Of Counsel</b>	\$975 - \$1,675 per hour
<b>Associates</b>	\$650 - \$1,075 per hour
<b>Paraprofessionals</b>	\$545 - \$595 per hour

15. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions, and such changes will be noticed in accordance with the Local Rules and/or practice.

16. The hourly rates set forth above are PSZ&J's standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate the Firm for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. It is the Firm's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, telephone and telecopier toll and other charges, mail and express mail charges, special or hand delivery charges, document retrieval, photocopying charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by the Firm to outside copying services for use in mass mailings, expenses for "working meals," computerized research, transcription costs, as well as non-ordinary overhead expenses such as secretarial and other overtime. PSZ&J will charge the Committee for these expenses in a manner and at rates consistent with charges made generally to the Firm's other clients and the rules and requirements of this Court. The Firm believes that it is more appropriate to charge these expenses to the clients incurring them than to increase the hourly rates and spread the expenses among all clients.

17. Subject to Court approval, the Committee is seeking to retain Genesis Credit Partners as its financial advisor and Pack Law, P.A. as its Florida counsel. PSZ&J will coordinate closely with Genesis and Pack Law to minimize the duplication of the services provided to the Committee by each professional and meet the scope of the services that each firm is retained to provide.

18. The Firm provides the following responses to the questions set forth in Part D of the Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under United States Code by Attorneys in Larger Chapter 11 Cases (the "Revised UST Guidelines"):



<b>Questions Required by Part D1 of Revised UST Guidelines:</b>	<b>Answer:</b>	<b>Further explanation:</b>
Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?	No.	N/A
Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?	No.	N/A
If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and reasons for the difference.	N/A	N/A
Has your client approved your respective budget and staffing plan, and, if so, for what budget period?	N/A	As Committee counsel, the Firm anticipates that the Committee's professional fees will be initially governed by the Debtor in Possession Financing order and budget approved in these cases. The Committee and its professionals reserve all rights to seek approval of Committee professional fees.

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

Executed on July 3, 2024

/s/ Bradford J. Sandler

Bradford J. Sandler, Esq.

**Schedule 1**

**Potential Parties in Interest**

**Top Vendors**

3301669 Nova Scotia Company	Marsh Usa Inc.
3b2 Solutions LLC	Merkle Inc.
Adp Inc.	Microsoft Corporation
Alixpartners Holdings LLP	Mobo Systems Inc.
AlSCO Inc.	Nuco2 Inc.
A O Smith Water Products	Op Oakhurst Realty LLC
Apex Systems Inc.	Oracle America Inc.
Aramark Uniform And Career Apparel Group Inc.	Paint Folks
Baker & Hostetler LLP	Pegnato Roof Intelligence Network
Barkley Inc.	Piedmont Cnl Towers Orland LLC
Blackhawk Network Inc.	Presidio Networked Solutions LLC
Broadstone RI Portfolio LLC	Presto Automation Inc.
Buntin Advertising Inc.	Pricewaterhouse Coopers LLP
Coastal Sunbelt Produce	Rubin Postaer And Associates
Cintas Corporation No 2	Sandy Alexander Inc.
Construction Operations And Renovation Experts	Sirna & Sons Inc.
Costa Do Soesto LLC	Slade Gorton & Co Inc.
Creation Gardens	SIm Waste & Recycling Services Inc.
Credera Enterprises Company LLC	Spirit Realty LP
Dinova Inc.	Strategic Solutions Inc.
Directv	State Industries Inc.
Doordash Inc.	Synq3 Restaurant Solutions LLC
Ecolab Pest Elimination	The Wasserstrom Company
Engie Insight Services Inc.	Town Center Refrigeration Inc.
Enviro Master Services LLC	Twc Services Inc.
Eplus Technology Inc.	Usp Apollo LLC
First American Exchange Company LLC	Vereit Operating Partnership LP
Four Corners Operating Partnership LP	Weil Gotshal & Manges LLP
Freshpoint Inc.	Zurich American Insurance Company
Gartner Inc.	
Gordon Food Service Canada Ltd.	
Gfs Canada Ltd.	
Helloworld Inc.	
Interactive Communications International Inc.	
Ipsos Insight LLC	
Itw Food Equipment Group LLC	
Johnson Controls Us Holdings LLC	
Kenneth O Lester Company Inc.	
(Performance Food Groups)	
Kepler Group LLC	
Logan Clark III	
Luxone LLC	

**Banks, Administrative Agents, Secured Lenders and UCC Lien Parties**

Blue Torch Credit Opportunities  
BTC Holdings Fund  
DBDB Funding LLC  
First Insurance Funding  
First Insurance Funding of Canada  
Fortress Credit Corp.  
Great America Financial Services Corporation  
TCW Asset Management Company, LLC  
TCW Skyline Lending LP  
Wells Fargo Bank, N.A.

**Debtor Professionals**

Berger Singerman LLP  
Blakes, Cassels & Graydon LLP  
Epiq Corporate Restructuring LLC  
Hilco Corporate Finance LLC  
Keen-Summit Capital Partners  
King and Spalding LLP  
Stephanie Medley

**Debtors**

Red Lobster Canada, Inc.  
Red Lobster Hospitality LLC  
Red Lobster International Holdings LLC  
Red Lobster Management LLC  
Red Lobster Of Bel Air, Inc.  
Red Lobster Of Texas, Inc.  
Red Lobster Restaurants LLC  
Red Lobster Sourcing LLC  
Red Lobster Supply LLC  
RL Columbia LLC  
RL Kansas LLC  
RL Maryland Inc.  
RL Of Frederick, Inc.  
RL Salisbury, LLC  
RLSV, Inc.

**Directors/Officers (Current and Former)**

Kate Acosta	Kelli Valade
Carrie Barner	Angela Wang
Patrick Bartels	Jarrett Whitlow
Raymond Blanchette, III	Kathy Wood
Rittirong Boonmechote	Fung Yan
Charles Braley	Joyce Zhang
Tim Breen	Monica Zhou
Joseph Brown	
Michelle Carr	
Thiraphong Chansiri	
David Cifelli	
Elizabeth Crago	
Joann Dashiell	
Horace G. Dawson, III	
Miranda Farren	
Richard Fung	
Ludovic Garnier	
Michael Greenberg	
Ana Gulacsy	
Shawn Harrs	
Nicholas Haughey	
Tonya Heron	
Lawrence Hirsh	
Aurinelis Infante	
Robert Knopp	
Matt Livesay	
David Michael Martin	
Jef Matray	
Daniel Mcleod	
Jeff Matray	
Arlene Mussenden	
Susan Pavel	
Jeffrey Peete	
Carlos Pena	
Meera Pereira	
Michelle Rhoades	
Ribeiro Hui Services Ltd.	
Norma Rivera	
Timothy Alexander Sibley	
Ravinder Singh	
Michael Sjuggerud	
Jonathan Tibus	
Trin Tapanya	

**Equity Holders**

Double P Consultants Co. Ltd.  
Employee Share Trust  
FWM Asia Holdings Limited  
FWM Dragon Holdings Limited  
FWM F&B Holdings Limited  
GGCOF RL Blocker, LLLC  
Intero Investment Gmbh  
Paul Kenny  
Terrance Tan Konghwa  
Stefan Leicht  
Red Lobster Hong Kong Ltd.  
Red Lobster Master Holdings Gp, LLC  
Red Lobster Shanghai Limited (Cn)  
RL Co-Investor Blocker LLC  
RL Management Holdings LLC  
RL Management Investors LLC  
Kanya Ruengprateepsang  
Seafood Alliance Limited  
Shanghai Honglong Wei Hui F&B Management Co. Ltd.  
Thai Union Group Public Company Limited  
Thai Union Investments North America LLC  
Thai Union North America, Inc.  
Rit Thirakomen  
Vineland Ventures Limited  
Fung Yan

**Indemnity / Guarantee Parties**

ARCP Acquisitions, LLC  
ARCP RL PORTOLIO I, LLC  
ARCP RL PORTOLIO II, LLC  
ARCP RL PORTOLIO III, LLC  
ARCP RL PORTOLIO IV, LLC  
ARCP RL PORTOLIO V, LLC  
ARCP RL PORTOLIO VI, LLC  
ARCP RL PORTOLIO VII, LLC  
ARCP RL PORTOLIO VIII, LLC  
ARCP RL PORTOLIO IX, LLC  
ARCP RL PORTOLIO X, LLC  
Broadstone RL Portfolio, LLC  
Liberty Mutual

**Insurance Providers**

0510 KLN Lloyd's Syndicate  
Ace American Insurance Company  
AIG  
Allied World Insurance Company  
American Guarantee and Liability  
American International  
Arch Insurance Company  
Ascot Specialty Insurance Company  
Axis Insurance Company  
Axis Surplus Insurance Company  
Bowring Marsh Bermuda  
Columbia Casualty Company  
Continental Insurance  
Endurance Assurance Corporation  
Everest Indemnity Insurance Co.  
Everest National Insurance Company  
Federal Insurance Company (Subsidiary of Chubb)  
Fireman's Fund Insurance Company  
Hartford Fire Insurance Co.  
Landmark American Insurance Company  
Lloyd's Of London  
Markel Bermuda  
Ohio Casualty Co.  
Ohio Insurance Agents Association Inc. Retro Group  
Palms Insurance Company, Limited  
Starstone Specialty Insurance Company  
Swiss Re Corporate Solutions Elite  
Talbot Syndicate Tal1183  
Travelers Property & Casualty Company of America  
Westchester Fire Insurance Company (Subsidiary of Chubb)  
Zurich American Insurance Company  
Zurich Canada  
Zurich North America

**Known Affiliates & JVs**

Red Lobster Asia Holdings Limited  
Red Lobster Cares, Inc.  
Red Lobster China Operations Co. Limited  
Red Lobster Holdings LLC  
Red Lobster Hong Kong  
Red Lobster Intermediate Holdings LLC  
Red Lobster Master Holdings, L.P.  
Red Lobster Seafood Co., LLC  
RL Billings, Inc.  
RL Of Jonesboro, Nc.  
Shanghai Honglong Wei Hui F&B Management Co.  
Shanghai Red Lobster F&B Management Company

**Landlords**

1st Coast Energy	2525 Bowling Green LLC
10010 Station LLC	2620 Mcfarland Blvd East LLC
100 Ih 35 North Owner LLC	27th Mesa LLC
10920 Moorpark LLC	29 Ocean Parkway LLC
109 West Anderson, LP	300, LLC
10th Fairway LLC	3087 Associates LLC
112 RLT LLC	3087 Rlga, LLC
1120 South Walton Partners LLC	3130 Plainfield Road, LLC
1123 - New Plan Hampton Village, LLC	32 Blanding Boulevard Owner LLC
116 Rlt LLC	3301669 Nova Scotia Company
1229 Richmond LLC	3360 Camp Creek Parkway Owner LLC
1340 East 9th Street Realty Corp.	3815 South Lamar, LP
1359 Sn Owners LLC	3909 Sunset Drive Owner LLC
13612 Harbor Boulevard LLC	39401 Fremont Boulevard LLC
1420 Noble Ave LLC	411 Lenox Realty Inc.
1601 Dahill Properties Inc.	416 Commerce Center Drive LLC
170 Wolf Road LLC	4230 Broadway Realty Co. Inc.
1726 Nc LLC	454 W 22 St LLC
1846 Jonesboro Road Owner LLC	6091 Sawmill Road LLC
1885 Ltd.	500 Galleria Dr - 10108896 LLC
20 Towne Center Owner LLC	5950 North Federal Investments LLC
2015 Wesel Blvd LLC	6701 18th Avenue Associates LLC
2300 Restaurant Corp	684 Myrtle Ave Realty LLC
2325 East Flamingo LLC	684 Myrtle Avenue Realty LLC
2328 Commercial Way Properties LLC	714 Yonge Street Inc.
2355 North Highway 41 Associates, LLC	698000 Alberta Ltd.
237 Uptown Inc.	801 Red Lobster LLC
2474 Valentine Realty LLC	8040 Kingston Pike Road Owner LLC



828 Eastern Bypass Owner LLC  
 8407 Little Road Owner LLC  
 95metcalf Properties InC  
 99 Year Lease  
 9069 Vantage Point Drive Owner LLC  
 Aark USA LLC  
 Aasthi LLC  
 Enayat Abrishami  
 Enayat Abrishami And Naima Abrishami  
 Ackrik Associates, LP  
 Adam Eidemiller Inc.  
 Admns Meadowlands Investment  
 Corporation  
 Advanced Housing Developers Inc.  
 Afli2 LLC  
 AIB Management I LP  
 Aib Shenandoah I, LLC  
 Airway Centre Inc.  
 Airway Centre Inc. C/O Carillion Services  
 Inc.  
 Aj Chen LLC  
 Akerman LLP  
 Alamance Crossing Cmbs, LLC  
 Alamo Crossing Commercial Association  
 Alexandria Seafood LLC  
 Alin Urun  
 Allan R Hoffman  
 Allstate Plaza West M2c Attn: Commercial  
 Mortgage Div  
 Almaden Plaza Merchants Assoc  
 Almaden Plaza Shopping Center, Inc.  
 Alr Racanelli LLC  
 Alva Investment Corp  
 Alysheba Association Inc.  
 Amb Property LP  
 American Finance Operating Partnership LP  
 American General Life Ins. Co. & National  
 Union Fire Ins. Co. Of Pittsburgh Pa  
 American Realty Capital Properties, Inc.  
 American United Life Insurance Company  
 Andersen Jung & Co.  
 Andrew J Bass Jr Irrevocable  
 Andrew J Bass Jr Irrevocable Trust  
 Andyharris LLC  
 Amj Wolf Corp  
 Anna Buecheler Investment Partnership

Annapolis Mall Shopping Ctr Co.  
 Annapolis Mall Shopping Center Company,  
 LLP  
 Annapolis Management Company C/O The  
 Beatson Companies  
 Antelope Valley Mall  
 Antelope Valley Shop, LLC  
 Apache Mall, LLC  
 Geraldine Aprahamian  
 Arc Clorlfl001, LLC  
 Armel LLC  
 Arundel Mills Limited Partnership  
 Arvig4 LLC  
 Ashby, Inc.  
 Atherton Development Company LP  
 At Home Holding Iii Inc.  
 Aucallutim LLC  
 August America LLC  
 Aviana Company Ltd.  
 Aviana Company Ltd. LLC  
 Avr Cpc Associates LLC  
 B33 Re Partners Investments Lll LLC  
 B33 Yuma Palms Iii LLC  
 B&A Development Real Estate Div Inc.  
 B&L Storage  
 Ballard Spahr LLP  
 Bancohio National Bank  
 Thomas J. Barger, Esq.  
 Barlas Rlr LLC  
 Tom Bass  
 Bassuk Brothers Management  
 Bay City Mall Partners LLC  
 Bay Plaza West LLC  
 Bay Plaza West, LLC C/O Prestige  
 Properties & Development Co., Inc.  
 Bdg Sufka LLC  
 Bel Air Square, LLC  
 Belk-Hudson Company Of Waycross, Ga,  
 Inc.  
 Wayne Belleau  
 Wayne A Belleau  
 Belos Exchange LLC  
 Belos Holding LLC  
 Beluz Properties X Ltd.  
 Benedetti & Associates  
 Bennett Boehning & Clary LLP

Ber Real Estate Investments Iv, LLC  
 Bertha Aiken LLC  
 Bhagat Md LLC  
 Big Red LLC  
 Big V Properties LLC  
 Bison Palm Desert, LLC  
 B Kline Family LLC  
 Black Sand Capitl Series 1 Mb, LLC  
 Blackstock Westside Associates LLC  
 Blj Holdings, LLC  
 Bluestripes Investments LLC  
 Blue Tree Properties Oh LLC  
 Boise Towne Plaza LLC  
 Boise Towne Plaza LLC C/O General  
 Growth Properties  
 Boise Towne Square  
 Bowles Crossing  
 Boyton Town Center  
 Bpg Hotel Partners Vi, LLC  
 Bpr Ff LLC  
 Bpw Inc.  
 Brand Property Management Corporation  
 Brandywine Commons Asc Of Rest  
 Bre Ddr Retail Holdings Iii LLC  
 Steven E Breitman  
 Briarholm Inc.  
 Norene Brink  
 Brixmor Operating Partnership LP  
 Broadridge Apartments LLC  
 Broadstone Rl Portfolio LLC  
 Broadway & Nevada LLC  
 Broadway & Pearl Associates, LLC  
 Broadway And Pearl Associates LLC  
 Brock Associates LLC  
 Brookside Improvements LLC  
 Brooks Shopping Center LLC  
 Brooks Shopping Centers LLC  
 Brown-Belkin Rl LLC  
 K. Bellamy Brown Murphy & Posner  
 Bryan Rental Inc.  
 Budd Street, LLC  
 Buildings For Babies Foundation  
 Burkhardt Development Group Inc.  
 Burns White  
 Paul A Butera  
 George A. Butler, Esq.

Bva Deerbrook Spe LLC  
 William N Cafritz @ Aip Associates LP  
 California Property Owner I, LLC  
 Caltamp Realty Associates LLC  
 Campbell Blacklidge Plaza De LLC  
 Camwood Construction Ltd.  
 Canada Redlob LP  
 Carnegie Management & Development Corp  
 Cassco Land Company Inc.  
 Catalina Partners L.P. C/O Glimcher  
 Colonial Park Mall, Inc.  
 Causeway Associates C/O Greater Lakeside  
 Corp.  
 Cay\Mem Joint Venture C\O Georgr Young  
 Cbl & Associates Limited Partnership  
 Cbl & Associates Management, Inc.  
 Cbl & Associates Properties, Inc.  
 Cbl Rm-Waco, LLC  
 Cbl-T-C LLC  
 Cb Portfolio, LLC  
 Centennial Real Estate Management, LLC  
 Centerpointcap I LLC  
 Center Pointe Associates, LP  
 Centrecorp Management Services Limited  
 Century Plaza Commercial LLC  
 Cg Watertown LLC  
 Cg Watertown LLC And Pw Watertown  
 LLC  
 Channel Islands Marketplace, LP  
 Charles & Co. Realty LLC  
 Damian Charles  
 Charles L Cauthorn Real Estate &  
 Development  
 Charlottesville Fashion Square  
 Kisan B Chavan  
 T. Paul S. Chawla, Esq  
 Harry S. Cherken, Jr, Esq. Biddle And Reath  
 Cheung K. Tom Leung & Betty Yuen-Wah  
 Leung Trust  
 Ch Gresham LLC  
 Chillicothe Mall Inc.  
 Christopher James Management Company  
 Chula Vista Center, LP  
 Chula Vista Center Management Office  
 Cielo Vista Mall Mgmt. Office

Cigna Investments Inc. C/O Cigna  
Investment Group  
Cincinnati Holding Company LLC  
Citicorp Usa, Inc. C/O Citycorp North  
America Inc.  
City Of Colorado Springs  
City Of Danbury  
City Of North Charleston  
Cj & J Corporation  
Clk Ann Arbor, LLC  
Cloud Enterprises Corporation Inc.  
Cobb Place Associates  
Coddling Enterprises  
Coddling Enterprises LP  
Cole Credit Property Trust Iv Inc.  
Colonial Park Mall Realty Holding LLC  
Conroe Marketplace S C, LP  
Cookeville Tn Investment Partners  
Coolsprings Crossing Limited Partnership  
Coltrane Real Estate Investments LLC  
Compass Commercial Inc.  
Conway Inn Corp  
Coral Ridge Mall  
Cornhusker Project Gi2 LLC  
Costa Do Soesto LLC  
Country LLC  
Country Orchard Estates Inc.  
Courtelis Company  
Cousins Prop. Of Tn, Inc. Attn: Henry  
Cenker, Vp-Land  
Cox, Castle & Nicholson  
Cpp River Falls LLC  
Cpp River Falls LLC & Cpp River Falls Ii  
LLC As Tenants In Common  
Credit Lyonnais New York Branc C/O  
Chicago Real Estate Group  
Credit Lyonnais New York Branc Credit  
Lyonnaish Building  
Cri Outparcels LLC  
Cr Kingston Associates LLC  
Crosspoint Realty Services Inc.  
C. S. Fossee C/O Reale Fossee  
Cumberland Mall Realty Holding LLC  
Curry Investment Company  
Curtis C. Curry Q Tip Trust  
Dacf Invest-4 LLC

Harry Dahl  
Dan C Inc.  
Dale Hale, LLC  
Danville Mall LLC  
David + Gilbert LLP  
David L Lansky  
Davrich Realty Corp  
Ddr Homestead LLC  
Ddr Southeast Fountains LLC  
Dees Sugar House Center LLC  
Del Amo Associates LLC  
Developers Diversified Realty Corporation  
Developments West Corporation  
Development West Corporation C/O Cb  
Commercial Property Mgn  
Diadon LLC  
Diajeff LLC C/O Kin Properties, Inc.  
Dillard Department Stores Inc. Dean L.  
Worley, Asst Gen Cnsl  
Diversified Investments Corp. Attn:  
Barbara  
Riel  
Dixie Partners V LP  
D J W Properties LLC  
Dlc Management Corporation  
D.L. Grove, Inc.  
Donovan LLP  
Drescher & Cheslow, P.A.  
Grant R Drewing  
Drury Development Corporation  
Drury Inns, Inc.  
Dtc Development Msp LLC  
Duvall & Fall, P.C.  
East Lampeter Associates LP  
Eastridge LP  
East West Crossings LLC  
Edmark I LLC  
Edward C. Smith C/O J.T. Jackson Co.  
Edward F. Selby And Linda L. Selby, As  
Trustees Of The Edward And Linda  
Selby Trust Dated May 29, 2012  
Edward J. Debartolo Corp.  
Ege5 LLC  
Eirrek Rlf LLC  
Elhio Ii LLC  
Elhio LLC

Elhio LLC & Elhio Li LLC  
 Joseph El Sineitti  
 Elyria Midway Mall LLC  
 Empire Mall, LLC  
 Esters-183 Joint Venture Attn James R  
 French  
 Esue LLC  
 E. Thomas Nasoff Co.  
 Eugenia F. Haasis Trust  
 Evergreen Commercial Property  
 Management  
  
 Fab-Rite LLC  
 Fair Oaks Community Development  
 Corporation  
 Far Horizons Trailer Village LLC  
 Jina Farzinpour  
 Fcpt Holdings LLC  
 Federal Realty Op LP  
 Federman Steifman LLP  
 Ferguson & Saunders  
 Renee L Ferrero  
 Renee L. Ferrero, Trustee  
 Frankie Fesko  
 Fima Development  
 First & Main LLC  
 First And Main, LLC C/O Norwood  
 Limited, Inc.  
 First Arizona RI Associates LLC  
 First Internet Bank Of Indiana  
 First Internet Bank Of Indiana - Mike Lewis  
 First National Realty Partners  
 First New York Partners  
 Benjamin Fiscella  
 William Fisher  
 William C Fisher Jr And Janet Fisher  
 Fk Properties LLC  
 Flamingo Eastern LLC  
 Ilene Flaum  
 Fleet Bank  
 Fleet Bank National Assoc  
 Florida National Properties Inc./W.C.I.  
 Florida National Properties Inc. / W.C.I.  
 Communities  
 Florida Plaza Owners Association Inc.  
 Floyd Lewis Real Estate

Fnw Realty Corp  
 Fnwrl LLC  
 Formosa Developers Inc.  
 Fortified Beltway Lanham LLC  
 Forty One Connector, Ltd.  
 Four Corners Operating Partnership LP  
 Four Hand Realty LLC  
 Fox River Shopping Ctr LLP  
 Fox River Shopping Center Ltd. C/O  
 General Growth Center Co.  
 Fox River Shopping Center LLP C/O  
 General Growth Prop. Inc.  
 Frenchtown Charter Township Business  
 Park Assoc Inc.  
 Frisco 3056 Preston LLC  
 Fr White Marsh, LLC  
 Fslro 10700 Parallel Kansas City LLC  
 Ft. Sheri Fort Wayne LLC  
 Ft Sheri Realty LLC A New York Limited  
 Liability Company  
 G&I X Crossroads Mzl LLC  
 Galleria At Wolfchase LLC  
 Galo Properties Inc.  
 Joseph Garofalo  
 Gateway Center Properties, LLC  
 Gateway Center Prop I LLC  
 Gcfp Limited Partnership  
 Gelly LLC  
 Marvin H Geistlinger  
 General Counsel Merchandise Group  
 Geneva Management LLC  
 Geneva RI Venture LLC  
 George And Flora Dunaian Revocable  
 Trust  
 George Dunaian And Flora Dunaian  
 Revocable Trust  
 Kent J. George, Esquire C/O Robinson &  
 McElwee PLLC  
 Jeannette D Germann  
 Gershenson Realty & Investment, LLC  
 Tilde Mariani Giacche  
 Gina El Sineitti Estate  
 Girardeau P2 LLC  
 Glr Property Management LLC  
 Ruth Goodman  
 Gotham Organization, Inc.

Gpg Clovis Holdings LLC  
 Gpg Clovis Owner LLC  
 Ggp Limited Partnership  
 Ggp Mall Of Louisiana LLC  
 Gp Texarkana LLC  
 Grae La Sierra LLC  
 Grand Robster LLC  
 Grand Robster LLC; Lompoc Jack LLC;  
 Handy Hardees LLC  
 Grd Properties, LLC  
 Greater Lakeside Corporation As Agent For  
 Causeway Associates  
 Great Northern Management Pr, LLC  
 Greenberg Traurig, LLP  
 Greentree Apartments LLC  
 Greenway Property LLC  
 Greenwood Mall Realty Holding LLC  
 Gressley, Kaplin & Parker LLP  
 Gri Eqty Sparkleberry Square LLC  
 Grupo Tj Properties  
 Gsms 2001-Gc5 East Broadway Boulevard,  
 LLC  
 Gsms 2011 Gc5 East Broadway Boulevard  
 LLC  
 Gtl Properties  
 Gtl Properties, LLLP  
 Aldo Guidotti  
 Guidotti Properties  
 Guima Brazil Usa LLC  
 Gurnee Mills Operating Company  
 Haasis/Mcgrath Joint Venture Acc  
 No 1036-7826  
 Kiemle Hagood  
 Hai Yue Tx LLC  
 Douglas V Hale  
 Halme & Clark  
 Hamburg, Karic, Edwards & Martin LLP  
 Hanabi  
 Hanabi A California General Partnership  
 H&R Property Management Ltd.  
 Handy Hardees LLC  
 Harbor Plaza LLC  
 Harco Capital LLC  
 Harmon Meadow Owner LLC  
 Haq Corporation  
 Hartman, Simons, Spielman & Wood, LLP

Harwell Capital, LLC  
 Hawaiian Properties Ltd.  
 Hc Lakeshore LLC  
 Hcl Goodyear Centerpointe LLC  
 Hcl Inglewood Village LLC  
 Hcl Inglewood Village, LLC C/O Haagen  
 Company, LLC  
 Hendrie Family Properties LLC  
 Herbert & Isabel Wolfe Trust  
 Herzman Nieces Exempt Trust  
 Herzman Nieces Exempt Trust U/D/T  
 December 15, 1972  
 Hickory Grove Community LLC  
 Hickory Hollow Development Inc.  
 Hickory Point LLC  
 Hiffman National, LLC  
 Highland Lakes Property LLC  
 Hkt Enterprises LLC  
 Hoffman 4101 Veterans Memorial LLC  
 Hoffman 4101 Veterans Memorial LLC,  
 C/O Woodson Development Co.  
 Holland & Hart LLP  
 Ned S. Holmes, Trustee  
 Home Depot U.S.A., Inc.  
 Home Properties  
 Homestead Pavilion Acquisition LLC  
 Homestead Pavilion Acquisitions LLC  
 Peter Moon Hong  
 Horlbeck, LLC, Alexander G. Thompson,  
 Ruth Ann Curry, Trustee  
 Howarth, Glenn S.  
 Hrp 0137 San Antonio, LLC  
 Hunter Equities 309 LLC  
 Hunter Equities 326 LLC  
 Hurst Savage & Vanderburg, L.L.P.  
 Id Seafood LLC  
 Illiana Realty  
 Imperial Life Assurance Co. Of Canada  
 Imperial Parking Canada Corp  
 Independence Properties 348 LLC  
 Indiana Land Trust Company - Trust #3518  
 Indigo Park Canada Inc.  
 Inland Southeast King's Grant, L.L.C.  
 Interstate Management LLC  
 Ironwood 1 LLC  
 Ironwood I, LLC

Ivision Holdings LLC  
 Jaffe Raitt Heuer & Weiss Pc  
 James F. Mcgrath  
 James M. Tomlin Attorney At Law  
 Janet M Robinson  
 Jcc California Properties LLC  
 Jcp Realty, Inc. Mail Stop 2102-Bldg B-1  
 Jeanne Jackson As Administratrix  
 Jeanne Jackson, Administratrix Of The  
 Estate Of Lee Jackson  
 Jaks LLC  
 Jal Enterprises Inc.  
 James Campbell Company LLC  
 Roger J Janow  
 Jfcf Invest-3 LLC  
 Jh Dreyfus LLC  
 Jll  
 Joe Amato East End Centre LP  
 John Hancock Mutual Life Insurance  
 Company  
 Johnsons Trailer Parks LLC  
 Jo-Lyn Management Corp  
 Jps Realty Management LLC  
 Jones Lang Lasalle  
 Jones Lang Lasalle Americas, Inc.  
 Joseph Garofalo 2017 Trust  
 Joseph P. Klapholz, Pa  
 Jssa Ventures Inc.  
 J T Jackson Company  
 Jtn-Rl LLC.  
 Juan Smyrna Owner LLC  
 Karruli LLC  
 Katy Mills Mall LP  
 Kb Riverdale LLC  
 Christel Kelley  
 Kelso Rl Property LLC  
 Kennedy Mall Ltd.  
 Kennedy Mall, Ltd. D/B/A Great East Plaza  
 Annex  
 Phil R Kensinger  
 Kensinger & Company, LLC  
 Kensinger Properties Ltd., C/O Kensinger &  
 Company, LLC  
 Kentucky Oaks Mall Company  
 Keystone Fiesta Plaza LLC  
 James Khezrie

Kimco Realty Corporation  
 Kimco Realty Op LLC  
 Kimven Corporation C/O Kimco Realty  
 Corp  
 King Of Prussia Pa Retail LLC  
 Kin Properties Inc.  
 Kir Copiague LP  
 K.I.R. Copiague L.P. C\O Kimco Realty  
 Corporation  
 Kite Realty Group LP  
 Kite Realty Group Trust  
 Kiu Nd Holdings LLC  
 Knickerbocker Properties, Inc.  
 Knox & American I LLC  
 Kolee 59 Trust  
 Steve Koroneos  
 Konstantine P. George  
 Kplp Ii LLC  
 Harry & Sarah Kranc  
 Sarah Kranc  
 Philip L. Kreitlein, Esq.  
 Krishnamoorti Family Limited Partnership  
 Krishnamoorti Family LP  
 Kriss & Feuerstein LLP  
 Kroll, Mcnamara, Evans & Delehanty, LLP  
 Ks Aob Toronto Inc.  
 Ks Aob Toronto Inc. And Dundas Atrium  
 Toronto Inc.  
 Ks Seafood LLC  
 Geoffrey M Kunz  
 William Kunz  
 Kuzmak-Williams, LLC  
 La Frontera Landlord LLC  
 La Jolla Group B LLC  
 L & A Michigan Partners, Ltd.  
 Landsource Inc.  
 L&S Toluca Properties  
 Lake Park Investors LLC  
 Lakeside Ootb Ventures, LLC  
 Lakes Mall Realty LLC  
 Lakewood Center Mall Attn: Mark Long,  
 G.M.  
 Lane4 Property Group  
 Langston Seawright  
 Thomas A. Langston  
 Lansing Retail Center LLC

Dennis Lapidus  
 Larco Management LLC  
 Largo Plaza C/O Kimco Realty Corporation  
 Laurel Lakes LLC  
 Laurel Lakes, LLC C/O Maryland Financial  
 Investors, Inc.  
 Lauth Management, LLC  
 L B Billingsley Investment Co.  
 Lbx Deptford Th LLC  
 Lbx Management LLC  
 Lebcon Associates Ltd.  
 LedgeWood Outparcel Investors LLC  
 Emily Ko Lee  
 Lehigh Valley Associates  
 Lehigh Valley Mall LLC  
 Leibco Realty Limited  
 Leland W Pollard  
 Cheung K Tom Leung  
 Levine Family Trust  
 Levitt & Boccio, LLP  
 Levy Family Limited Partnership  
 Michael A Lightman Sr  
 Limestone Redcan Ulc  
 Limestone Redlob LLC  
 Lincoln Center LLC  
 Lincoln Center LLC C/O Shorenstein  
 Properties LLC  
 Lincoln Holdings LLC  
 Steve Lin  
 Linda Roth, P.A.  
 Linden Business Center Assn  
 Lo Brothers Investment Co Ltd.  
 Lo Brothers Investment Co, Ltd. C/O  
 Archigraph Inc.  
 Lobster Building  
 Lobzona LLC  
 Lod Jacksonville LLC  
 Lohrmann & Rim, P.C.  
 Lompock Jack LLC  
 Longfish Improvements LLC  
 Louis Joliet Realty LLC  
 Lowes Home Centers Inc.  
 Loyal Plaza Sc LLC  
 Loyal Plaza Sc Realty Fund LLC  
 Lpk Holdings, LLC And Bpw, Inc.  
 Lpre Holdings LLC

Lsg1 Crossroads Square LLC  
 Lth Investments LLC  
 Luxone LLC  
 Lufkin Mall Realty Holding LLC  
 L W Riverdale LLC  
 Lyn-Jo Washington LLC  
 Macerich Lakewood, LLC C/O Macerich  
 Management Company  
 Macwh LP  
 Macys Inc.  
 Macy's Retail Holdings, LLC - Ca  
 Madden Family LLC No 3  
 Madison East Towne LLC  
 Mae Dean Wheeler Trustee  
 Main & Main Del Paso LLC  
 Mall Del Norte LLC C/O Cbl & Associates  
 Management Inc.  
 Mall Of Louisiana  
 Mall Of Louisiana, LLC  
 Mall Of South Carolina Outparcel LP  
 Mall Of South Carolina Outparcel LP C/O  
 Cbl & Assoc. Mgmt. Inc.  
 Manhattan 338 Corp  
 Maplewood Partners LLC  
 Marci Shapiro LLC  
 Marine Iron & Ship Bldg Co Inc.  
 Marine Iron & Ship Building Company  
 Marion Plaza Associates LP  
 Marion Plaza Associates LP C/O Madison  
 Acquisitions, LLC  
 Mark J. Freitag, Trustee Of The Mark J.  
 Freitag Trust Of 1988  
 Mark J Freitag Trust Of 1988  
 Benjamin Marks  
 Marland Limited Partnership  
 Marquette Realty Capital, LLC  
 Maryland Financial Investors, Inc.  
 Robert Mascall And Susan Woodell Mascall  
 Mbi Red Lob LLC  
 Mcd 6 LLC  
 Mcclure& Kornheiser, LLC  
 Mccrary Law, P.C.  
 Mrs. Eleanor Mcgrath  
 Mckinley Mall  
 Mckinley Mall, LLC  
 Dr J Roland Mckinney & Mrs Martha

Mckinney  
 M.D. Atkinson Company, Inc.  
 Meile Investment LLC  
 Meile Investment, LLC D/B/A Doubletree  
 By Hilton Monrovia-Pasadena  
 Meislik & Levavy  
 Alan Merovitch, Esq.  
 Mesa Valley Housing Associates II Limited  
 Partnership  
 Gerald Messuri  
 Gerald And Rita Messuri  
 Metrocenter Mall - Management Office  
 Metro North Crossing LLC  
 Meyers, Roman, Friedberg & Lewis  
 Mga Mcdonough, LLC  
 Mga Ventures Inc.  
 Michael, Levitt, Goldberger & Rubenstein,  
 LLC  
 Mi Claw LLC  
 Midamerica Hotels Corporation  
 Mid-Atlantic Property Jt LLC  
 Middletown I Resources L P  
 Midway Shopping Center, L.P.  
 Millcreek Plaza Company Limited  
 Partnership  
 Milpitas Town Center 2008 LP  
 Frank Mineo  
 Mir Queens Place Associates, LLC  
 Mir Queens Place LLC  
 Mission San Jose LLC  
 Mkn Property Inc.  
 Ml Claw LLC  
 M. Leo Storch Management Corporationrch  
 Developer  
 Anne Mohr As Trustee Of The Horst Mohr  
 Trust  
 Monica Inc.  
 Montgomery Cross Retail Group LLC  
 Montvista LLC  
 Moorland Medicine LLC  
 Morguard Boynton Town Center Inc.  
 Mortgage Electronic Registration Systems,  
 Inc.  
 Mosites Development Company  
 Mount Hunger Holdings LLC  
 Mpnt Michigan LLC

Mpnt Realty LLC  
 Vincent A Muzzi  
 Myers, Roman, Friedberg & Lewis  
 Nadg Nnn Rlob May Nj LP  
 Naples Leasing 416 LLC  
 Kannan Natarajan Co-Trustee  
 Natarajan Living Trust  
 Bahram Navid  
 Navid Bypass Trust 07262020  
 Byron Navid  
 Kefayat Navid  
 Navid Qtip Trust 07262020  
 Nelson Slosbergas, P.A  
 Net Leased Management  
 New Plan Hampton Village LLC  
 New Towne Mall Realty Holding LLC  
 New York Mutual Life Insurance Company  
 Nexbank Ssb  
 Nextgen Woodside Realty LLC  
 Next Tech Development LLC  
 North American Development Group  
 Northfield Bank  
 Northfield Stapleton Associates LLC  
 Northtown Square LLC  
 Northtown Square, LLC C/O Stejer  
 Development, LLC  
 North Valley Plaza, LLC  
 North Valley Plaza, LLC C/O Kimco Realty  
 Corporation  
 Northwest Promenade LLC  
 Nts Corporation - Spoa  
 Nwcc Center Plaza LLC - 0010448  
 Nwcc Investments Ii LLC  
 Oakdale Village LLC  
 Oaktree Investments 4 LLC  
 Oakwood Plaza Limited Partnership  
 Oakwood Plaza LP  
 Obeach LLC  
 Ocean Bank  
 Cozen O'connor  
 Ocre Investments LLC  
 Office Complex Enterprises Inc.  
 Offit Kurman, P.A.  
 Olesen Al LLC  
 Omaha Cave Partnership LP



Omaha Cave Partnership, L.P. C/O St. Louis  
County Realty Co.  
Ontario Mills Ltd. Partnerhip  
Op Oakhurst Realty LLC  
Orion Investment & Management Ltd.,  
Corp.  
Orion Real Estate Group  
Orlando Plaza Partners  
Outer Banks Limited Partnership  
Overland Corp Center Property  
Ovm Delaware LLC, Campbell Blacklidge  
Plaza De LLC, First Ave./Wetmore  
Office Plaza De LLC, And Twovm  
Investments LLC  
Owned  
Oxford Development Company – Moraine  
Oxford Development Company Associates  
Pacific Premier Retail Trust LLC  
Soon Chun Nanci Pak  
Panobster LLC  
Pared Motel Associates LLC  
Robert D Parham  
Robert D. Parham & Judy J. Parham  
Park East LLC  
Park Mall LLC  
Park Place Management Pr, LLC  
Parkway Crossing Association  
Shashikant Patil  
Bishwendu K Paul  
Paul Mantella Limited And Horner  
Developments Limited  
Peconic LLC  
Penn Mutual Life Insurance Company  
Peoples Security Life Insurance Co. (Loan  
87758)  
Juan Perez  
Jose Perez  
Otto M Perez  
Perini Land & Development Co.  
Persam Wethersfield LLC  
Pfa-C Silver Spring Lc  
Pfp Columbus Ii LLC  
Pheasant Realty LLC  
Phillips Edison Arc Shopping Center  
Operating Partnership LP  
Phoenix Ig, LLC

Phoenix Partners LLC  
Piedmont Cnl Towers Orland LLC  
Pierre Bossier Mall Realty Holding LLC  
Pine Bluff Income Properties LLC  
Pine Ridge Mall C/O Capital Real Estate  
Services, LLC  
Pine Ridge Mall Jc, LLC  
Pine View Enterprises LLC  
Pinlen Lubbock LLC  
Piper Rudnick LLP  
Piqred LLC  
Pk Ii El Camino North LP  
Pk Ii El Camino North, LP C/O Kimco  
Realty  
Plaza Speedway LLC  
Pointe @ Tampa Palms Association Inc.  
Port Mcdonald, Inc.  
Pottstown Center LP  
Pottstown Center LP C/O Longview  
Management  
Pran McCain LLC  
Pratt Goldsmith Inc.  
Preferred Associates LLC  
Prestige Properties & Development Co., Inc.  
Price Development Company LP Inactive  
See Lad1295  
Prime Bank  
Prime Site Development, Inc.  
Private Restaurant Properties, LLC  
Prologis LP  
Promenade Red Cliffs L.L.C  
Provender Hall I LLC  
Provender Hall Iv, LLC  
Prss LLC  
Prudential Insurance Co. Of America Attn:  
T.C. Kennif  
Puma Industries 307 LLC  
Pvsc Company  
Pw Watertown LLC  
Qr Rushmore LLC  
Quail Lakes Executive Plaza Association  
Quail Lakes Owners Association  
Queensbury Plaza I, LLC  
Rai Sawak LLC  
Rai Union Realty, LLC  
R&H Properties LP

Radiant Sunset Building, LLC  
 Rainbow Investment Co  
 Rainbow Investment Co LP  
 Ramco Jacksonville LLC  
 Raymarc Re LLC  
 Rb Sandrini Farms LP  
 Rcg-Psc Camp Creek Owner, LLC  
 Rcg Ventures, LLC  
 Rdhw Management LLC  
 Real Estate Services Inc.  
 Realty Income Corporation X 2293  
 Redd Realty Services C/O Redd Realty  
 Services  
 Red Garden LLC  
 Redlob Sheppard Avenue Limited  
 Partnership  
 Redlob Sheppard Avenue LP  
 Red Lobster Of Lakeland LLC  
 Red Lobster St Cloud Mn LLC  
 Red Olive Properties LLC  
 Red Summit Fair LLC  
 Redwood Nc LLC  
 Reep-Rtl Dtc Va LLC  
 Regency Centers Corporation  
 Regency Centers LP  
 Regency Commerce Center Owners Assoc  
 Inc.  
 Reims Incorporated  
 Related Retail Management Corporation  
 Retail Opportunity Investments Partnership  
 LP  
 Retail Value Trs LLC  
 Rfh1 LLC  
 Rgli LLC  
 Rh Tacoma Place Associates LLC  
 Rh Tacoma Place Associates, LLC And  
 H.I.R. 3  
 Rhyl Realty Inc.  
 Richmond Mall Partners, LLC  
 Ridge Line Inc.  
 Riocan Management Inc.  
 Riocan (Reit) West  
 Ripco Management, LLC  
 River Oaks El Paso, LLC  
 River Oaks Properties Ltd.  
 River Prairie LLC

Riverside Income Fund I LP  
 Rivertown Point Court Property Owners  
 Association  
 Rjp Rl I Drive LLC  
 Rl1ak LLC  
 Rl12580 LLC  
 Rl 4010 LLC  
 Rl Arizona LLC  
 Rlca Properties Inc.  
 Rl Charleston Owner LLC  
 Rl Decatur LLC  
 Rl Elizabethtown LLC  
 Rl Enterprises LLC  
 Rlfl, LLC  
 Rl Jensen Beach LLC  
 Rl Kaf LLC  
 Rl Kbn LLC  
 Rl Kokomo LLC  
 Rl Lcg LLC  
 Rl Madison Heights LLC  
 Rl Mpn LLC  
 Rl New Brunswick Owner LLC  
 Rl Ptx LLC A Texas Limited Liability  
 Company  
 Rl.Ptx LLC C/O Ron Demilt  
 Rl Schaumburg LLC  
 Rl Sdn LLC  
 Robbies Inc.  
 Robbie's Inc. C/O Charles Robertson  
 Rockstep Christiansburg, LLC  
 Rod De Llano Family Partnership LP  
 Rogers Towers, P.A.  
 Roic California  
 Roic California, LLC  
 Roland, Fogel, Koblenz & Carr  
 Round Rock Rl LLC  
 Rouse Properties LLC  
 Rouse Properties Reit Inc.  
 Roworth Enterprises, LLC  
 Rpi Salisbury Mall LLC  
 Rprl Mobile LLC  
 Rprl Stony Brook LLC  
 Rprl Union 22 LLC  
 Rpt Realty LP  
 Rsc Associates LLC  
 Rsjs Travis Blvd LLC

Rvm Glimcher LLC  
 Rvt Homestead Pavilion LLC  
 Rxr 5ts Holdings Jv LLC  
 Rxr 5ts Owner LLC  
 Rxr Realty  
 Ryg Realty Inc.  
 Rynako LP  
 Sabbl-Nampa, LLC  
 Sacramento Savings Bank  
 Saga Canadian Management Services  
 Limited  
 Saga LLC  
 Saint Anthony Real Estate LLC  
 Salinas Shopping Center Associates LP &  
 Harden Ranch Plaza Associates LLC  
 Salisbury Mall Realty Holding LLC  
 San Bernardino Restaurant Asso C/O The  
 Graymont Group  
 San Bruno Towne Center Partnership  
 Sanmarco Company  
 Santa Fe Mall Realty Holding LLC  
 Sarl Jv  
 Sayage Valdosta LLC  
 Mark Saydah  
 Scf Rc Funding I, LLC  
 Scf Rc Funding III LLC  
 Scf Rc Funding Iv LLC.  
 Scfrc-Hw-V LLC  
 Sc Heights LLC  
 Schamel, Jannice  
 Karen K Schneeberger  
 Karen K. Schneeberger And Frank A. Mineo  
 Schneider, Stuart  
 Scp Northfield, LLC  
 Scp Reo Fund Northfield Splitter LP  
 Scullin Real Estate V LLC  
 Scullin Real Estate Vii LLC  
 Bob Scullin  
 Robert J Scullin  
 Sears, Roebuck & Co.  
 See Screen 21  
 Edward F Selby  
 Linda Lea Selby  
 Seltzer Caplan McMahon Vitek  
 Seminole Mall Realty Holding LLC  
 Serg 13 LLC

Serota Islip Ga, LLC  
 Shades Creek R&I Corp Tutwile Properties  
 Ltd.  
 Shantinath Cs LLC  
 Shapell Properties, Inc.  
 Shawnee Mall Owner LLC  
 Shoppes At Solana LLC  
 Shop Towne Center Inc.  
 Simonian Family 2008 Trust  
 Simon Property Group L.P.  
 Simon Prop Grp Silver Springs Series, A  
 Series Of Owl's Nest Properties, LLC  
 (Tx) LP  
 Simon Property Group (Texas), L.P. C/O  
 Simon Property Group  
 Shorenstein Properties LLC  
 Shutts & Bowed LLP  
 Shutts & Bowen LLP  
 Sierra Property Management  
 Silver Spring Series, A Series Of Owl's Nest  
 Properties, LLC  
 Skyhy Property LLC  
 Sleiman Enterprises, Inc.  
 Smbsiris LLC  
 Smith Bros.-Ziegler  
 Smith Family Trust  
 Smith Family Trust Dated 1-7-1982  
 Smith Legacy LLC  
 Smith Ranches  
 Richard L. Smith C/O J.T. Jackson Co.  
 Robert C. Smith C/O J.T. Jackson Co.  
 Walter F. Smith C/O J.T. Jackson Co.  
 William H. Smith C/O J.T. Jackson Co.  
 Sm Mesa Mall, LLC  
 Sms Ambassadors Corp  
 Snowden Square Phase Ii Retail Center  
 Association Inc.  
 Socrates Investments Inc.  
 Solano Town Center Owner LLC  
 Southbay Highlands Limited Partnership  
 Southeast Realty Associates LLC  
 Southeast Realty Associates, LLC C/O Win  
 Properties, Inc.  
 Southern Hills Mall Realty Holding LLC  
 South Florida Property Management, Inc.  
 South Forks Associates

Southlands Colorado LLC  
 Southmall Development Company C/O  
     Robert R. Brown & Co.  
 South Midtown Properties LLC  
 Spadea Inc.  
 Gerald L Spande  
 Speedway95 LLC  
 Spencer Development LLC  
 Spencer Real Estate LLC  
 Spinoso Management Group, LLC  
 Spinoso Real Estate Group, LLC  
 Spirit  
 Spirit Master Funding Ix, LLC  
 Spm Acquisition LLC  
 Spoorna Holdings LLC  
 Sports Arena Village Ltd.  
 Sports Arena Village, Ltd. Commercial  
     Space Coordinator  
 Spotsylvania Towne Center  
 Spring Hill Mall Realty Holding LLC  
 Srb Gateway, LLC  
 Sss Northwest Crossing LLC  
 Sss Northwest Crossing LLC & Sss  
     Northwest Marketplace LLC  
 Ss Small Mouth Parkersburg LLC  
 Stagnaro, Saba & Patterson Co., Lpa  
 Star-West Great Northern Mall LLC  
 Staunton Em 2 LLC  
 Steates Remmell Steates And Dziekan  
 Steerpoint Capital II, LLC  
 Stemmons Crossroads Assoc  
 Stiles Property Management  
 Stockdale Management, LLC  
 Stone Land, LLC  
 Stout Law LLP  
 Stuart Co.  
 Sunbeam Development Corporation  
 Sundler & Daniels C\O Thomas Daniels,  
     Esq  
 Sunrise Hills  
 Superior Steel Studs Inc.  
 Sure Fire Group LLC  
 Surfside Square Condominium Association  
     Inc.  
 Swb-Lynn Holdings LLC  
 Swift Creek Associates LP

Swift Creek Associates, L.P. C/O Bet  
     Investments  
 Sw Investments, LLC  
 Swr-Lv LLC  
 Swr - Lv, L.L.C. C/O Redd Realty Services  
 Symetra Life Insurance Company  
 Taag Ventures LLC  
 Taitz RI Mobile LLC  
 Tampa Palms North Owners Association  
 T&D Smith Family Trust Dated July 2, 1996  
 Tanger Outlets Deer Park, LLC  
 Tanger Properties Limited Partnership  
 Target Stores  
 Taylor & Monroe LLC  
 Tcam Core Property Fund Operating LP  
 Tech One Associates  
 Ted And Marias Plaza LLC  
 Tehans Realty Company  
 Tehan's Realty Company C/O Tehan's  
     Catalog Showrooms, Inc.  
 T Eastgate Plaza Nr Nv, LLC  
 Terrana Law P.C.  
 Texas Hotel Management LP  
 The 2015 Hong Family Trust  
 The Aprahamian Trust  
 The Atkins Group  
 The Bahieh Jina Farzinpour 2001 Living  
     Trust  
 The Denny Law Firm, PLLC  
 The Estate Of James Campbell  
 The Evelyn D Benedetto Family Partnership  
     LLP  
 The Evelyn Dibenedetto Family Partnership  
     LP  
 The George Family Trust  
 The Gerrard Family Limited Partnership  
     LLLP  
 The Harry And Jeanette Weinberg  
     Foundation Incorporated  
 The Howard Group  
 The Jean Ann Becker Revocable Trust  
 Dated  
     10-19-2007  
 The Kisan B. Chavan & Kundan K. Chavan  
     Livng Trust  
 The Law Offices Of Stanley P. Kupfer, P.C.

The Macerich Partnership LP  
 The Paul Family Trust Dated June 19, 1997  
 The Prado Sc, LLC  
 The Promenade Diberville LLC  
 The P Smith Realty LLC  
 The Raphael Family Wooster Street  
 Company LLC  
 The Shoppes At Solana, LLC  
 The Simpson Organization, Inc.  
 The Steve Hongdur Lin And Carol Yao Lin  
 Revocable Trust Dtd 7/22/94  
 The Storage Bin Inc.  
 The Villages Commercial Property  
 Management  
 The Villages Commercial Property  
 Mangement  
 The Vireo Group  
 The Woods Of East Brunswick Property  
 Owners Association Inc.  
 Thf Chesterfield Development, LLC  
 Thf Chesterfield Dev LLC  
 Thf Maplewood Outparcel Development  
 LLC  
 Thf Realty, Inc.  
 Thf St Clairsville Develop LP  
 Thf St. Clairsville Development, L.P.  
 Thomas Peter Moyer Trust  
 Thompson & Company Inc.  
 Thompson, Welch, Soroko & Gilbert LLP  
 Three Rivers Mall L.L.C.  
 Three Rivers Village, LLC  
 Tmp Sre 1 LLC  
 Tmp Sre I, LLC  
 Tn Oak Ridge Rutgers LLC  
 Tom & Lee Holding Co LLC  
 Tom & Lee Holding Company, LLC And  
 Tom Family Trust Of 1984  
 Tornig Ga LLC  
 Town West Realty, Inc.  
 Tpi 1960 Retail LLC  
 Tpi Cypress Pointe LLC  
 Tso Winchester Station LP  
 Travel Lobster LLC  
 Tribella Properties LLC  
 Tri-Cities Investment Co. Attn: Joe Thalman  
 Trinity Development Group Inc.

Trinity Property Services - Itf - Admns  
 Triple Bar York Marketplace LLC  
 Tr Uwo Fred Ziess  
 Twelve Oaks Mall Ltd. Partnrshp  
 Two D Holdings LLC  
 Ub Midway LLC  
 Ue 2100 Route 38 LLC  
 Ue 675 Route 1 LLC  
 Union Bank  
 Union Bank & Trust  
 University Venture Corp  
 Uptown Partners Ltd.  
 Urban Edge Properties LP  
 Hacik Urun  
 Us Centennial Malls Jv LLC  
 Usp Apollo LLC  
 Ut Heights LLC  
 V2 Associates LLC  
 Valley Stream Green Acres LLC  
 Van Vliet Acquisition Iv LLC  
 Vasiliki, LLC  
 Philip Velka  
 Venable LLP  
 Vera Cruz Properties LP  
 Vera LLC  
 Vereit  
 Vereit Operating Partnership LP  
 Vestar Bowles Crossing LLC  
 Vestar Crossroads Gilbert LLC  
 M Coppley Vickers C/O M. Coppley  
 Vickers & Associates, P.C.  
 Villages / Acorn Investments Ltd.  
 Village/Acorn Investments, Ltd.  
 Village At Burlington Owners Association  
 Vinsue Corp  
 Vno 7000 Hadley Road LLC C/O Vornado  
 Realty Trust  
 Vornado Realty Trust  
 Vsr4 Investments LLC  
 Michael Scott Walker  
 Wal-Mart Real Estate Business Trust  
 Wal-Mart Stores, Inc. Property Management  
 Walster LLC  
 Washington Mall - Jcp Associates, Ltd.  
 Washington Mall- Jcp Assoc Ltd.

Washington Prime Property Limited  
Partnership  
Washington Prime Property LP  
Waterford Lakes Town Center LLC  
Weatherby Enterprises  
Patricia A Weatherby  
Patricia Weatherby And Mary K. Darin  
Weingarten I-4 Clermont Landing LLC  
Westcor Partners  
Westcor Inactive See Lad1804  
Westlakes Mall Tom Schammel, G.M.  
Westerman Ball Ederer Miller Zucker &  
Sharfstein, LLP  
Westport Plaza Ltd.  
Westridge Park Investors Limited  
Partnership  
Westridge Park Investors L P  
Whitehorse 3 LLC  
Whrl Mobile LLC  
Whrl RI Mobile LLC  
Whrl Stony Brook LLC  
Widewaters Group Inc.  
Widewaters Lakewood Village Center  
Company, LLC  
Wild Realty 1, LLC  
Wild Realty 3, LLC  
Wilk Auslander LLP  
Wilkinson Companies, Inc.  
Wilkinson Dekalb Land Company LLC  
Winchester Seafood LLC  
Windsor Realty Ltd. Partnership  
Winmar Company, Inc. Ronald Roberts,  
S.V.P.  
Louis Wintermeyer  
Robert & Susan Woodall-Mascall, Trustees  
Of Mascall Family Trust  
Woodbridge Heights Associates LLC  
Woodbury Corp  
Woodside Parma LLC  
Woodsonia Hwy 281, LLC  
Woods Rogers Plc  
Woolley, Dale & Dingwall Barristers &  
Solicitors  
World Class Investments LLC  
Wp Centers Reit 2 LLC  
Wpe Investment 10 LLC

Wv Lonestar Owner LLC  
Yasmon 19 Group LLC  
Yavapai Prescott Indian Tribe  
Roy Timothy Young  
Roy T. Young, Trustee Of The Roy Timothy  
Young Revocable Trust Uad April 6,  
2011  
Henry E. Ziegler C/O J.T. Jackson Co.  
Zuricha Capital Ltd.

**Litigation Parties**

2355 North Highway 41 Associates LLC  
3909 Sunset Drive Owner, LLC  
Bdg Sufka, LLC  
Eleasia Blackman  
Esperanza Carr  
E. O. Magdalia Colon  
Maria Dasilva  
Ecolab Inc.  
Elton Garrett  
Ggc Real Estate Investments I, L.P.  
Linda Guccini  
Nadina Hujic, N.B. (Nadia Hujic's Minor  
Son), And Monique Lewis  
Anna Hurlston  
Ipsos-Insight, LLC  
Louis R. Oliveira And Garen A. Oliveira  
Family Trust Dated April 15, 2020  
Luxone, LLC  
Dezzie Ray Marshall (Class Action)  
Op Oakhurst Realty, LLC As Successor To  
Provender Hall Iv LLC  
Rainbow Investment Co., LP  
Melissa Randazzo  
Carrie Robertson  
Roworth Enterprises, LLC  
Hector Sanchez  
Jose Santoyo  
Glenda Savery  
Kenneth Scheben  
Emma Scheller  
Larry Thurston  
Diane Tucker  
Robert Walker  
Tracy Walker  
Sharon Weinand And Frank Olsson  
Erich Whiteford

**Material Contract Counterparties**

Fcpt Holdings, LLC  
Continental Mills, Inc.  
Kenneth O. Lester Company Inc. (Performance Food Groups)  
Pepsi-Cola Advertising And Marketing, Inc.  
Pepsico Sales, Inc.  
Pfg Customized Distribution  
Spirit Master Funding Ix, LLC

**Non-Debtor Professionals**

Alix Partners  
Proskauer Rose LLP  
Weil, Gotshal & Manges LLP

**Sureties and Letter of Credit Beneficiaries**

Aiken Electric Cooperative, Inc.  
Alabama Power Company  
Arizona Public Service  
Baltimore Gas And Electric Company  
Birmingham Water Works Board  
Bowling Green Municipal Utilities Bgmu  
Brownsville Public Utilities Board  
Carroll Electric  
Central Arkansas Water  
Central Florida Gas Company  
City of Baytown  
City of Bloomington  
City of Cartersville Water Dept.  
City of Clearwater  
City of Cookeville  
City of Decatur  
City of Dothan, Alabama  
City of East Point - (2777 East Point Street  
East Point, Ga 30344)  
City of Farmington  
City of Fayetteville  
City of Fort Myers  
City of Fort Worth Water Department  
City of Houston, Public Works &  
Engineering Dept.  
City of Huntsville  
City of Huntsville, Alabama



City of Lake City Fl  
City of Lakeland Florida  
City of Mesquite  
City of Oak Ridge Utilities Business Office  
City of Ocala  
City of Pasadena  
City of Peru  
City of Richmond  
City of Rocky Mount  
City of Tallahassee  
City of Winter Haven

Clarksville Department Of Electricity  
Clay Electric Cooperative, Inc.  
Coast Electric Power Association  
College Station Utilities  
Commissioner of Public Works  
Coweta - Fayette Electric Membership  
Corporation  
Decatur Utilities  
Delmarva Power And Light Company  
Duke Energy Carolinas, LLC  
Duke Energy Florida, Inc. DbA Duke Energy  
Duke Energy Ohio, Inc.  
Duke Energy Progress, Inc.  
Electric Power Board of Chattanooga  
Electric Power Board of The Metropolitan  
Government of Nashville And Davidson  
County, Tennessee  
Elizabethtown Gas  
Elk River Public Utility District  
Emerald Coast Utilities Authority  
Florence Utilities, City of Florence,  
Alabama  
Florida Power & Light Company  
Florida Public Utilities  
Fort Pierce Utilities Authority  
Georgia Power Company  
Greystone Power Corporation  
Gulf Power Company  
Hartford Financial Services Group  
Hillsborough County Public Utilities  
Department  
Jackson Electric Membership Corporation  
Jackson Energy Authority  
Jea, A Body Politic

Jefferson County Dept of Revenue  
Johnson City Power Board  
Kansas City Power and Light  
Kansas Department of Revenue  
Kansas Gas Service  
Kcmo Water Services Department  
Kentucky Utilities Company  
Keyspan Gas East Corporation D/B/A  
National Grid  
Kissimmee Utility Authority  
Kitchener-Wilmot Hydro Commission  
Knoxville Utilities Board  
Lake Apopka Natural Gas District  
Lansing Board of Water & Light  
Las Vegas Valley Water District  
Liberty Mutual Group  
Liberty Utilities Georgia  
Long Island Lighting Company Dba Lipa  
Louisville Gas and Electric  
Manatee County Public Works  
Marietta Board of Lights And Water  
Mishawaka Utilities  
Mississippi Power Company  
Mobile Gas Service Corporation  
Modesto Irrigation District  
Montgomery Water Works  
Murfreesboro Electric Department  
Nebraska Public Power District  
New York State Electric and Gas (Nyseg)  
North Little Rock Electric  
Oak Ridge Utility District - 120 S. Jefferson  
Circle - Oak Ridge Tn  
Okaloosa County Gas District  
Orange County Utilities Service  
Orlando Utilities Commission  
Pacific Gas and Electric Company  
Peco An Exelon Company  
Portland General Electric Company  
Potomac Electric Power Company  
Puget Sound Energy  
Salt River Project Agricultural Improvement  
and Power District  
Sebring Gas System, Inc. Fl  
Sevier County Electric System, Sevierville,  
Tennessee  
Sevier County Utility District (Scud), Tn

Shawnee Municipal Authority  
South Carolina Electric & Gas  
South Carolina Public Service Authority  
(Santee Cooper)  
Southeast Alabama Gas District  
Southern California Edison  
Southwestern Electric Power Company /  
American Electric Power Co.  
State Of Mississippi  
State Of Nevada  
State Of Oklahoma  
State Of Oklahoma City Tax Commission  
Sumter Electric Cooperative, Inc.  
Syracuse Ny - Keyspan Gas East  
Corporation Dba National Grid Credit &  
Collection - 300 Erie  
Tampa Electric Company  
Teco Peoples Gas  
Tennessee Department of Revenue  
Texas Gas Service, Tx  
The Board of Water, Light and Sinking Fund  
Commissioners of The City Of Dalton  
Dba Dalton Utilities  
The Brooklyn Union Gas Company D/B/A  
National Grid Ny  
The Empire District Company  
The Regional Municipality of Durham  
Travelers  
Tucson Electric Power Company  
Tullahoma Utilities Board  
Tupelo Water & Light Department  
Tucson Electric Power Company  
UGI Utilities, Inc.  
U.S. Customs and Border Protection  
Utah Department of Alcoholic Beverage  
Control  
Village Of Bolingbrook  
Village of Forsyth  
Village of Orland Park  
Virginia Electric and Power Company  
Walton Emc And Walton Emc Natural Gas  
Arthur Weigold  
West Virginia Alcohol Beverage Control  
Administration  
Withlacoochee River Electric Cooperative,  
Inc.

Wells Fargo Bank, N.A.

**Unions**

ED Food and Commercial Workers Canada Local 1006a  
United Food and Commercial Workers of Canada

**Utility Providers**

Alabama Power	Waste Connections
Ameren	Waste Management National Services Inc.
Aps	Xcel Energy
Atmos Energy	
Bp Energy Retail Company LLC	
Centerpoint Energy	
Century Link	
Columbia Gas	
Comcast	
Con Edison	
Consumers Energy	
Direct Energy	
DirecTV	
Dominion Energy	
Dominion Va/Nc Power	
DTE Energy	
Duke Energy	
Dynegy Energy Services	
Enbridge Gas Inc.	
Energy Harbor	
Entergy	
FPL - Florida Power & Light Company	
Georgia Power	
GFL Environmental Inc.	
Hudson Energy Canada Corp	
Interconn Resources LLC	
Pacific Gas & Electric	
Pse&G-Public Service Elec & Gas Co.	
PSEGLI	
Shell Energy Solutions - Ca	
Shell Energy Solutions Ne	
Smartestenergy Us LLC	
Southern California Edison	
Southern California Gas (The Gas Co.)	
Southwest Gas	
Symmetry Energy Solution LLC	
Teco: Peoples Gas	

**Bankruptcy Judges for the U.S. Bankruptcy Court for the Middle District of Florida  
(Orlando Division)**

Tiffany Geyer  
Grace E. Robson  
Lori V. Vaughn

**U.S. Trustee's Office for Region 21**

Audrey Aleskovsky  
Michael W. Aponte  
Scott E. Bomkamp  
Bryan Buenaventura  
Maureen E. Gimenez  
Jill Kelso  
Lori Luce  
Robert Lynch  
Allysan Mcguire-Gonzalez  
Daniel Munoz  
Donna Murray  
Ana Rosa Rodriguez  
Ileraine F. Salloum  
Maxie Sellers  
William J. Simonitsch  
Patricia A. Sinclair  
J. Leila Singh  
Mary Ida Townson

**Exhibit B**

**Declaration of Jennifer Heeringa**

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

IN RE:

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC,

Case No. 6:24-bk-02486-GER

RED LOBSTER RESTAURANTS LLC,  
RLSV, INC.,  
RED LOBSTER CANADA, INC.,  
RED LOBSTER HOSPITALITY LLC,  
RL KANSAS LLC,  
RED LOBSTER SOURCING LLC,  
RED LOBSTER SUPPLY LLC,  
RL COLUMBIA LLC,  
RL OF FREDERICK, INC.,  
RED LOBSTER OF TEXAS, INC.,  
RL MARYLAND, INC.,  
RED LOBSTER OF BEL AIR, INC.,  
RL SALISBURY, LLC,  
RED LOBSTER INTERNATIONAL HOLDINGS LLC,

Jointly Administered with  
Case No. 6:24-bk-02487-GER  
Case No. 6:24-bk-02488-GER  
Case No. 6:24-bk-02489-GER  
Case No. 6:24-bk-02490-GER  
Case No. 6:24-bk-02491-GER  
Case No. 6:24-bk-02492-GER  
Case No. 6:24-bk-02493-GER  
Case No. 6:24-bk-02494-GER  
Case No. 6:24-bk-02495-GER  
Case No. 6:24-bk-02496-GER  
Case No. 6:24-bk-02497-GER  
Case No. 6:24-bk-02498-GER  
Case No. 6:24-bk-02499-GER  
Case No. 6:24-bk-02500-GER

Debtors.

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**DECLARATION OF JENNIFER HEERINGA IN  
SUPPORT OF APPLICATION OF THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS TO RETAIN AND EMPLOY PACHULSKI  
STANG ZIEHL & JONES LLP AS LEAD COUNSEL EFFECTIVE AS OF JUNE 3, 2024**

I, Jennifer Heeringa, as an authorized representative of the Committee, declare under penalty of perjury as follows:

1. I, Jennifer Heeringa, was elected as a Co-Chair of the Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-referenced chapter 11 Cases (the “Cases”) of the above-captioned debtors (collectively the “Debtors”). I am authorized to submit this declaration (the “Declaration”) in support of the *Application of the Official Committee of*

*Unsecured Creditors to Retain and Employ Pachulski Stang Ziehl & Jones LLP as Lead Counsel Effective as of June 3, 2024* (the “Application”) on behalf of the Committee.<sup>1</sup>

**The Committee’s Selection of the Firm as Counsel**

2. Pachulski Stang Ziehl & Jones LLP (the “Firm”) is proposed to serve as lead counsel to the Committee. The Committee recognizes that a review process is necessary in managing counsel to ensure that bankruptcy professionals are subject to the same scrutiny and accountability as professionals in non-bankruptcy engagements. The review process utilized by the Committee here assessed potential committee counsel based on their expertise in the relevant legal issues and in similar proceedings, as well as the Firm’s experience before this Court.

3. On May 31, 2024, the Office of the United States Trustee (the “U.S. Trustee”) appointed the Committee pursuant to section 1102 of the Bankruptcy Code. The Committee consists of the following nine (9) members: ): (i) Warner Bros. Discovery, Inc. (Co-Chair); (ii) Realty Income Corporation (Co-Chair); (iii) Gordon Food Service Canada Ltd. (Co-Chair); (iv) Kenneth O. Lester Company, Inc. d/b/a Performance Food Group; (v) PepsiCo Sales, Inc.; (vi) George Parker; (vii) Credera Enterprises Company, LLC; (viii) Rubin Postaer and Associates; and (ix) Provender Hall I, LLC, Provender Hall IV, LLC, *See* Docket No. 250.

4. On June 3, 2024, the Committee held a meeting and, among other things, voted to retain the Firm as its counsel, subject to Court approval. The Committee believes that the Firm’s extensive experience in corporate reorganizations, both out of court and under chapter 11 of the Bankruptcy Code, makes it well qualified to represent the Committee in these Cases in an efficient and timely manner. Thus, the Committee decided to retain the Firm as the Committee’s counsel during these Cases.

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<sup>1</sup> A capitalized term used but not defined herein shall have the meaning ascribed to it in the Application.



5. On June 4, 2024, the Committee selected Pack Law, P.A. (“Pack Law”) to serve as its Florida counsel and Genesis Credit Partners (“Genesis”) to serve as its financial advisor in these Cases, subject to Court approval. The Committee determined in its reasonable judgment that it requires such professionals in order to fulfill its duties and statutory obligations.

6. I understand that the Committee’s professional, including the Firm, Pack Law, and Genesis, have coordinated to ensure that there is no unnecessary duplication of services performed on behalf of the Committee or charged to the Debtors’ estates. I also understand that the Committee’s professionals have established channels of communication to keep other such professionals appropriately informed of each other’s activities and related developments.

#### **Rate Structure**

7. In my capacity as a Co-Chair of the Committee, I, and the other Co-Chairs and members of the Committee, are responsible for supervising the Committee’s professionals, including the Firm. The Firm has informed the Committee that its rates are consistent between bankruptcy representations, including related transactional and litigation services. The Firm has informed the Committee that its current hourly rates apply to non-bankruptcy services, if any, provided by the Firm. I understand that the Firm does not maintain separate departments devoted to other legal practices different from the bankruptcy and insolvency areas. I therefore understand that the Firm therefore does not have different billing rates and terms for non-bankruptcy engagements that can be compared to the billing rates and terms for the Committee’s engagement of the Firm.

#### **Cost Supervision**

8. The Committee will approve any prospective budget and staffing plan that may be filed by the Firm prior to it being filed, recognizing that, in the course of large chapter 11 cases

like these Cases, it is possible that there may be a number of unforeseen fees and expenses that will need to be addressed by the Committee and the Firm. I further recognize that it is the Committee's responsibility to closely monitor the billing practices of their professionals to ensure the fees and expenses paid by the estates remain consistent with the Committee's expectations and the exigencies of the Cases. The Committee will also review any periodic invoices from any other professional retained, with Court approval, by the Committee to ensure that there is no unreasonable duplication of services among the Committee's professionals, as more fully discussed above.

9. The Committee will also review any periodic invoices that the Firm regularly submits, and, together with the Firm, periodically amend any budget and staffing plans, as the Cases develop.

*[Remainder of Page Intentionally Left Blank]*

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

Dated: July 3, 2024

**THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF RED  
LOBSTER MANAGEMENT LLC, *ET  
AL.***

By: /s/Jennifer Heeringa  
**Jennifer Heeringa,**  
**North American Director of Credit**  
**Gordon Food Service Canada Ltd.**

Solely in its capacity as Co-Chair of the  
Official Committee of Unsecured Creditors  
of Red Lobster Management LLC, *et al.*, and  
not in any other capacity

**Exhibit C**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

IN RE:

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC,

Case No. 6:24-bk-02486-GER

RED LOBSTER RESTAURANTS LLC,

Jointly Administered with

Case No. 6:24-bk-02487-GER

RLSV, INC.,

Case No. 6:24-bk-02488-GER

RED LOBSTER CANADA, INC.,

Case No. 6:24-bk-02489-GER

RED LOBSTER HOSPITALITY LLC,

Case No. 6:24-bk-02490-GER

RL KANSAS LLC,

Case No. 6:24-bk-02491-GER

RED LOBSTER SOURCING LLC,

Case No. 6:24-bk-02492-GER

RED LOBSTER SUPPLY LLC,

Case No. 6:24-bk-02493-GER

RL COLUMBIA LLC,

Case No. 6:24-bk-02494-GER

RL OF FREDERICK, INC.,

Case No. 6:24-bk-02495-GER

RED LOBSTER OF TEXAS, INC.,

Case No. 6:24-bk-02496-GER

RL MARYLAND, INC.,

Case No. 6:24-bk-02497-GER

RED LOBSTER OF BEL AIR, INC.,

Case No. 6:24-bk-02498-GER

RL SALISBURY, LLC,

Case No. 6:24-bk-02499-GER

RED LOBSTER INTERNATIONAL HOLDINGS LLC,

Case No. 6:24-bk-02500-GER

Debtors.

**ORDER AUTHORIZING AND APPROVING  
THE EMPLOYMENT AND RETENTION OF PACHULSKI STANG  
ZIEHL & JONES LLP AS LEAD COUNSEL TO THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS OF THE DEBTORS EFFECTIVE AS OF JUNE 3, 2024**

Upon the application (the “Application”)<sup>1</sup> of the Official Committee of Unsecured Creditors (the “Committee”) for entry of an order, as more fully described in the Application, authorizing and approving the employment and retention of Pachulski Stang Ziehl & Jones LLP (“PSZ&J” or the “Firm”) as lead counsel to the Committee effective as of June 3, 2024, pursuant to sections 328 and 1103 of the Bankruptcy Code and Bankruptcy Rule 2014; and upon consideration of the Sandler Declaration and the Heeringa Declaration submitted in support of the Application and annexed thereto as Exhibits A and B (collectively, the “Declarations”); and the Court being satisfied based on the representations in the Application and the Sandler Declaration that PSZ&J is qualified to provide the services described in the Application and has disclosed all connections with parties required by Bankruptcy Rule 2014; and the Court have jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the Committee’s notice of the Application and opportunity for a hearing on the Application were appropriate and that no other or further notice need be provided; and the Application having been properly served with the Local Rule 2002-4 negative notice legend informing parties of their opportunity to respond within 14 days of the date of service; [and upon no objections to the Application having been filed; and upon the Court, therefore, considering the Application to be unopposed;] and the Court having reviewed the Application and the Declarations; and the Court having found that the Committee’s

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

retention and employment of PSZ&J is in the best interests of the Committee and its members; and after due deliberation and good and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Application is **APPROVED**.
2. The Committee is hereby authorized to retain and employ PSZ&J as lead counsel to the Committee in these Chapter 11 Cases, pursuant to sections 328 and 1103 of the Bankruptcy Code and Bankruptcy Rule 2014, effective as of June 3, 2024.
3. PSZ&J is authorized to perform any and all services for the Committee that are necessary or appropriate in connection with the legal services described in the Application.
4. PSZ&J shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Debtors' Chapter 11 Cases as set forth in the Application and the Sandler Declaration, and in compliance with sections 330 and 331 of the Bankruptcy Code and the applicable provisions of the Bankruptcy Rules, Local Rules, and any other applicable procedures and orders of the Court. For the avoidance of doubt, and as required by the Local Rules and the Procedure Manual, "Compensation will be determined later in accordance with 11 U.S.C. § 330" and "The hourly rate is not guaranteed and is subject to review."
5. The Firm shall use its reasonable efforts, and coordinate with the Committee and their other retained professionals, to avoid any duplication of services provided by any of the Committee's other retained professionals in these Chapter 11 Cases.
6. The Committee and PSZ&J are authorized to take all actions necessary to implement the relief granted in this Order.

7. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.

# # #

**Submitted by:**

Joseph Pack, Esq.

*Local Counsel to the Official Committee of Unsecured Creditors*

Pack Law, P.A.

51 Northeast 24th Street, Suite 108

Miami, Florida 33137

Tel: 305-916-4500

Email: joe@packlaw.com

*(Attorney Joseph A. Pack, Esq. is directed to serve a copy of this order on interested parties who do not receive service by CM/ECF and file a proof of service within three days of entry of the order.)*