

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

In re:

November 26, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-12245 (KBO)

(Jointly Administered)

**SECOND SUPPLEMENTAL DECLARATION OF JOSHUA D. MORSE  
IN SUPPORT OF THE DEBTORS' APPLICATION FOR ENTRY OF  
ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF  
PILLSBURY WINTHROP SHAW PITTMAN LLP AS COUNSEL TO  
THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

I, Joshua D. Morse, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner of the law firm of Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury”). I am authorized to submit this declaration to supplement (the “Second Supplemental Declaration”) certain information contained in the *Debtors' Application for Entry of Order Authorizing the Retention and Employment of Pillsbury Winthrop Shaw Pittman LLP as Co-Counsel to the Debtors Effective as of the Petition Date* [Docket No. 77] (the “Application”).<sup>2</sup> This Second Supplemental Declaration supplements the Morse Declaration filed in support of the Application.

2. Recently Pillsbury began representing Intesa Sanpaolo SpA /Retail, a party identified in the Application as a potential party in interest, in a matter wholly unrelated to the

---

<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are: November 26, Inc. (f/k/a Biolase, Inc.) (2441); Nov. 26 Acquisition Corp. (f/k/a BL Acquisition Corp.) (4140); Nov. 26 Acquisition II, Inc. (f/k/a BL Acquisition II, Inc.) (6022); and Nov. 26 Office, LLC (f/k/a Model Dentist Office, LLC) (9372). The Debtors' headquarters are located at 19800 MacArthur Blvd, Suite 820, Irvine, CA 92612.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

Debtors or these cases. I understand that this matter is not a major engagement, and is expected to generate fees of less than one-half of 1% of Pillsbury's annual fees billed in 2025.

3. Pillsbury discloses this new representation to the Court and attaches an updated **Exhibit 2** to the Morse Declaration reflecting Pillsbury's current representation of Intesa Sanpaolo SpA /Retail.

4. I do not believe that the disclosure in this Second Supplemental Declaration impacts Pillsbury's disinterestedness.

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

Date: February 20, 2025

/s/ Joshua D. Morse  
Joshua D. Morse  
Pillsbury Winthrop Shaw Pittman LLP

**Exhibit 2**

**Current Client**

American Express  
Bank of America  
Banc of California  
Borden Ladner Gervais LLP  
Computershare Trust Company  
Intesa Sanpaolo SpA /Retail (Pending New Client)  
Northrup Grumman

**Affiliate of Current Client**

Axis Insurance  
Biolase Europe, GmbH  
Biolase India Private Limited  
Biolase Spain, S.L.  
Deloitte Asesores Tributarios  
Farouk Maamoun Tamer & Co.  
Lumina Power  
Wesco Insurance  
Westair Gases and Equipment

**Former Client**

Argonaut Insurance Company  
Aarow Electronics  
BDO USA LLP  
Borden Ladner Gervais LLP  
City of Philadelphia  
Computershare Trust Company  
Deloitte  
Federal Express  
Fortech LLC  
GlassRatner Advisory & Capital Group LLC  
Grant Thornton  
Greenberg Traurig LLP  
Henry Schein  
Internal Revenue Service  
Linde Gas & Equipment  
Macias Gini & O'Connell LLP  
John Nelson  
Sidley Austin  
Sierra Medical Science Inc.  
Elizabeth Thomas  
Travelers  
Woodruff-Sawyer & Co.