

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

)			
In re:)		Chapter 11	
)			
AMALGAM LIQUIDATION, LLC, <i>et al.</i> , ¹)		Case No. 23-90901 (MI)	
)			
Debtors.)		(Jointly Administered)	
)			
)		Re: Docket No. 419	

**CERTIFICATE OF NO OBJECTION TO
FIRST INTERIM AND FINAL FEE APPLICATION
OF SIMPSON THACHER & BARTLETT, COUNSEL FOR DEBTORS, FOR FINAL
ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED
AND REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED
FROM NOVEMBER 8, 2023 THROUGH AND INCLUDING MARCH 21, 2024**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* (the “**Complex Case Procedures**”), the undersigned proposed counsel for Amalgam Liquidation, LLC and its affiliated debtors and debtors-in-possession (collectively, the “**Debtors**”) certifies as follows:

1. On March 27, 2024, Simpson Thacher & Bartlett filed its *First Interim and Final Fee Application of Simpson Thacher & Bartlett, Counsel for Debtors, for Final Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from November 8, 2023 Through and Including March 21, 2024* (Docket No. 419) (the “**Application**”).² Attached to the Application was a proposed form of final order granting the relief requested in the Application (Docket No. 419-1). (the “**Proposed Order**”). Objections to the Proposed Order were required to be filed on or prior to April 17, 2024 (the “**Objection Deadline**”).

¹ The location of the Debtors’ service address for purposes of these chapter 11 cases is: 7700 Anagram Drive, Eden Prairie, MN 55344.

² Capitalized terms used but not otherwise defined herein shall have the m



2. Attached hereto as **Exhibit A** is the form of Proposed Order filed as an exhibit to the Application.

3. In accordance with paragraph 44 of the Complex Case Procedures, the undersigned counsel files this Certificate of No Objection and represents to the Court that: (i) the Objection Deadline has passed; (ii) the undersigned counsel is unaware of any unresolved objection to the Application; and (iii) the undersigned counsel has reviewed the Court's docket and no objection to the Application appears thereon.

4. The Debtors respectfully request entry of the Proposed Order.

Dated: April 18, 2024
Houston, Texas

Respectfully submitted,

By: /s/ Tom A. Howley

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- and -

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*Counsel to the Debtors and the Debtors
in Possession*

Certificate of Service

I certify that, on April 18, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Tom A. Howley

Tom A. Howley

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

In re:	§	
	§	
AMALGAM LIQUIDATION, LLC,	§	Chapter 11
<i>et al.</i> ,	§	
	§	Case No. 22-90901 (MI)
Debtors. ¹	§	
	§	(Jointly Administered)
	§	
	§	

**FINAL ORDER ALLOWING COMPENSATION
AND REIMBURSEMENT OF EXPENSES
(Docket No. ____)**

The Court has considered the Final Application for Compensation and Reimbursement of Expenses filed by Simpson Thacher & Bartlett LLP (the “Applicant”). The Court orders:

1. Applicant is allowed compensation and reimbursement of expenses in the amount of \$2,356,104.08 for the period set forth in the application.
2. The compensation and reimbursement of expenses allowed in this order and all previous interim allowances of compensation and reimbursement of expenses are approved on a final basis.
3. The Debtors are authorized to disburse any unpaid amounts allowed by paragraphs 1 or 2 of this Order.

Dated: _____, 2024
Houston, Texas

THE HONORABLE MARVIN ISGUR

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Amalgam Liquidation, LLC (f/k/a Anagram Holdings, LLC) (8535); Amalgam Liquidation International, Inc. (f/k/a Anagram International, Inc.) (2523) and Amalgam Liquidation International Holdings, Inc. (f/k/a Anagram International Holdings, Inc.) (5837). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 7700 Anagram Drive, Eden Prairie, MN 55344.