

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

EO Liquidating, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 17-10243 (LSS)

(Jointly Administered)

Hrg. Date: April 24, 2019 at 11:00 a.m.

Related to Docket Nos. 1000 and 1020

NOTICE OF SUPPLEMENT TO FINAL FEE APPLICATION OF COLE SCHOTZ P.C.

TO: (i) the Debtors; (ii) the Office of the United States Trustee; (iii) counsel to Sportsdirect.com Retail Ltd.; and (iv) counsel to Official Committee of Unsecured Creditors and (v) all parties entitled to notice pursuant to Del. Bankr. L.R. 2002-1. Parties receiving notice in the above-captioned chapter 11 cases pursuant to Fed. R. Bankr. P. 2002 shall receive this Notice only, pursuant to the Interim Compensation Order [Docket No. 202].

PLEASE TAKE NOTICE that, on March 22, 2019, the **Final Fee Application of Cole Schotz P.C., Counsel to the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Final Period from February 5, 2017 through March 15, 2019** [Docket No. 1000] (the "Final Fee Application") was filed with the Court.

PLEASE TAKE FURTHER NOTICE that, by the Final Fee Application, Cole Schotz P.C. requested, among other things, reasonable and necessary fees and expenses incurred in connection with preparing, filing and prosecuting final fee applications for the period from March 16, 2019 through the hearing on the Final Fee Application and time thereafter for fees related to the case dismissal, and estimated such fees and expenses to be approximately \$20,000.


PLEASE TAKE FURTHER NOTICE that, Cole Schotz hereby files the supplement (the "Supplement") to its Final Fee Application, attached hereto as Exhibit A. The Supplement includes fees in the amount of \$10,689.00, and actual and necessary expenses in the amount of \$20.90 incurred during the Post-Effective Date Period through April 18, 2019.

¹ The Debtors and the last four digits of their respective federal taxpayer identification numbers, where applicable, are as follows: EO Liquidating, LLC (9164); Subortis Retail Financing, LLC (9065); EM Liquidating, LLC (9553); Subortis IP Holdings, LLC; BS Liquidating, LLC (4389); and BS/EM Liquidating, LLC (9618). The Debtors' executive headquarters are located at 160 Corporate Court, Meriden, CT 06450.



Dated: April 22, 2019

COLE SCHOTZ P.C.



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*Counsel for Debtors and
Debtors in Possession*

EXHIBIT A

Cole Schotz P.C.EO LIQUIDATING, LLC
160 CORPORATE COURT
MERIDEN, CT 06540

New York

New Jersey

Maryland

Texas

Florida

Re: **Client/Matter No. 56181-0001**
CHAPTER 11Invoice No. 833953
April 4, 2019

FOR PROFESSIONAL SERVICES RENDERED THROUGH MARCH 31, 2019

<u>DATE</u>	<u>NARRATIVE</u>	<u>INITIALS</u>	<u>HOURS</u>	<u>AMOUNT</u>
	CASE ADMINISTRATION		5.00	\$2,075.00
03/19/19	EMAIL TO AND FROM L. JOHNSON RE: HEARING ISSUES	PJR	0.10	59.50
03/19/19	REVIEW AND EXECUTE CERTIFICATION RE: OMNIBUS HEARING ORDER	PJR	0.10	59.50
03/19/19	EFILE CERTIFICATION OF COUNSEL AND ORDER RE: APRIL 24, 2019 OMNIBUS HEARING DATE AND UPLOAD ORDER	PVR	0.30	88.50
03/19/19	UPDATE CASE CALENDAR RE: HEARING DATE AND APPLICABLE DEADLINES RE: APRIL 24TH HEARING	PVR	0.10	29.50
03/19/19	EMAIL FROM P. REILLEY AND DRAFT CERTIFICATION OF COUNSEL AND ORDER RE: APRIL 24, 2019 OMNIBUS HEARING DATE	PVR	0.10	29.50
03/20/19	CONFERENCE WITH T. MEIGHAN RE: CASE DISMISSAL AND CLAIM ISSUES	PJR	0.30	178.50
03/20/19	UPDATE CASE CALENDAR RE: OBJECTION DEADLINE RE: COLE SCHOTZ 20TH MONTHLY FEE APPLICATION	PVR	0.10	29.50
03/21/19	EMAIL FROM AND TO T. MEIGHAN RE: OUTSTANDING FINAL FEE APPLICATIONS AND RESEARCH SAME	PVR	0.10	29.50
03/22/19	EMAIL FROM P. REILLEY AND TO T. MEIGHAN RE: DRAFT COLE SCHOTZ FINAL FEE APPLICATION	PVR	0.10	29.50
03/22/19	REVIEW AND REVISE NOTICE OF CASE DISMISSAL	PJR	0.10	59.50
03/22/19	EMAILS TO AND FROM T. MEIGHAN RE: DOCUMENT DESTRUCTION AND CLAIM ISSUES	PJR	0.20	119.00
03/22/19	EMAIL EXCHANGE WITH L. KOTLER AND KCC RE: SERVICE OF BRACEWELL FINAL FEE APPLICATION	PVR	0.20	59.00
03/22/19	CONFERENCE WITH P. REILLEY AND REVISE DISMISSAL NOTICE	PVR	0.20	59.00
03/22/19	EMAIL TO J. FELDSHER, M. DENDINGER AND L. KOTLER RE: FILED BRACEWELL FINAL FEE APPLICATION	PVR	0.10	29.50

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<u>DATE</u>	<u>NARRATIVE</u>	<u>INITIALS</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/22/19	UPDATE CASE CALENDAR RE: HEARING DATE AND OBJECTION DEADLINE RE: COLE SCHOTZ FINAL FEE APPLICATION	PVR	0.10	29.50
03/22/19	EMAIL FROM AND TO S. CARNES, P. REILLEY AND P. JACKSON AND RESEARCH RE: PROVINCE FILED INTERIM FEE APPLICATIONS	PVR	0.20	59.00
03/22/19	EMAIL FROM AND TO P. REILLEY RE: FILING MERU FINAL FEE APPLICATION ON MARCH 25, 2019	PVR	0.10	29.50
03/22/19	EMAIL TO KCC RE: SERVICE OF AND RETRIEVE ORDER SCHEDULING OMNIBUS HEARING DATE	PVR	0.10	29.50
03/25/19	CONFERENCE WITH T. MEIGHAN RE: DOCUMENT DESTRUCTION AND CASE CLOSING ISSUES	PJR	0.20	119.00
03/25/19	UPDATE CASE CALENDAR RE: HEARING DATE AND OBJECTION DEADLINE RE: BRACEWELL FINAL FEE APPLICATION, COOLEY FINAL FEE APPLICATION, DRINKER BIDDLE FINAL FEE APPLICATION AND PROVINCE FINAL FEE APPLICATION AND RETRIEVE COMMITTEE'S APPLICATIONS	PVR	0.50	147.50
03/25/19	REVIEW EMAILS FROM D. LUDMAN AND T. MEIGHAN RE: LICENSE ISSUES	PJR	0.10	59.50
03/25/19	REVIEW AND REVISE CERTIFICATION OF DESTRUCTION AND EMAILS TO P. BOUTIN, D. MELORO AND T. MEIGHAN RE: SAME	PJR	0.20	119.00
03/26/19	REVIEW AND EXECUTE NOTICE OF HEARING RE: CASE DISMISSAL	PJR	0.10	59.50
03/26/19	UPDATE CASE CALENDAR RE: OBJECTION DEADLINE RE: NOTICE RE: DISMISSAL OF CH. 11 CASES	PVR	0.10	29.50
03/26/19	CONFERENCE WITH T. MEIGHAN AND D. MELORO (IN PART) RE: CLAIM PAYMENTS, DECLARATION AND CASE DISMISSAL ISSUES	PJR	0.40	238.00
03/26/19	EMAIL TO T. MEIGHAN, P. REILLEY AND N. CAMPBELL RE: FILED MERU FINAL FEE APPLICATION AND NOTICE RE: DISMISSAL OF CHAPTER 11 CASES	PVR	0.10	29.50
03/26/19	UPDATE CASE CALENDAR RE: HEARING DATE AND OBJECTION DEADLINE RE: MERU FINAL FEE APPLICATION	PVR	0.10	29.50
03/26/19	CONFERENCE WITH P. REILLEY AND PREPARE NOTICE RE: DISMISSAL OF CHAPTER 11 CASES FOR FILING	PVR	0.10	29.50
03/26/19	EFILE AND COORDINATE SERVICE OF NOTICE RE: DISMISSAL OF CHAPTER 11 CASES	PVR	0.30	88.50
03/28/19	CONFERENCE WITH J. LEAMY RE: CASE STATUS AND UST FEES	PJR	0.20	119.00
	CLAIMS ANALYSIS, ADMINISTRATION AND OBJECTIONS		0.50	\$297.50
03/20/19	REVIEW AND ANALYZE CLAIM OBJECTION ORDERS AND CERTIFICATIONS RE: CLAIM DISTRIBUTION ISSUES	PJR	0.20	119.00

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03/25/19	REVIEW AND ANALYZE REDSTONE CLAIM, CLAIM OBJECTION ORDERS AND CERTIFICATION AND EMAIL TO T. MEIGHAN AND P. ROUTIN RE: DISTRIBUTION ON REDSTONE CLAIM	PJR	0.30	178.50
	FEE APPLICATION MATTERS/OBJECTIONS		15.70	\$6,221.50
03/18/19	REVIEW AND REVISE EXHIBITS TO FEE APPLICATION RE: COMPLIANCE	PJR	0.30	178.50
03/18/19	CONTINUE PREPARING COLE SCHOTZ FINAL FEE APPLICATION	PVR	1.90	560.50
03/19/19	CONTINUING DRAFTING COLE SCHOTZ FINAL FEE APPLICATION	PVR	2.90	855.50
03/20/19	REVIEW DRAFT FINAL FEE APPLICATION AND REVIEW RELATED BUDGETS	PJR	0.40	238.00
03/20/19	UPDATE CHART OF PROFESSIONAL FEES	PVR	0.10	29.50
03/20/19	CONFERENCE WITH L. KOTLER RE: FINAL FEE ISSUES	PJR	0.10	59.50
03/20/19	REVIEW AND EXECUTE COLE SCHOTZ FEE APPLICATION AND REVIEW RELATED EXHIBIT	PJR	0.20	119.00
03/20/19	CONTINUE DRAFTING COLE SCHOTZ FINAL FEE APPLICATION	PVR	1.10	324.50
03/20/19	PREPARE COLE SCHOTZ 20TH MONTHLY FEE APPLICATION FOR FILING	PVR	0.20	59.00
03/20/19	EFILE AND COORDINATE SERVICE OF COLE SCHOTZ 20TH MONTHLY FEE APPLICATION	PVR	0.30	88.50
03/21/19	EMAIL TO S. CARNES AND P. JACKSON RE: COMMITTEE FEE ISSUES	PJR	0.10	59.50
03/21/19	REVIEW AND REVISE FINAL APPLICATION AND REVIEW RELATED BUDGETS, STAFFING PLANS AND SUMMARY OF FEES FOR COMPLIANCE WITH FEE GUIDELINES	PJR	1.80	1,071.00
03/21/19	CONFERENCE WITH P. RATKOWIAK RE: FINAL FEE APPLICATION AND BUDGET ISSUES	PJR	0.40	238.00
03/22/19	EMAILS TO AND FROM S. CARNES RE: COMMITTEE FEE ISSUES	PJR	0.10	59.50
03/22/19	REVIEW AND REVISE CHART OF BUDGETED HOURS AND FEES AND COMPARE TO ACTUAL BUDGETS	PVR	0.40	118.00
03/22/19	EMAILS TO AND FROM L. KOTLER RE: BRACEWELL FEE ISSUES	PJR	0.20	119.00
03/22/19	CONFERENCE WITH L. KOTLER RE: FEE APPLICATION ISSUES	PJR	0.10	59.50
03/22/19	CONFERENCE WITH P. RATKOWIAK RE: FEE APPLICATION AND FILING AND SERVICE ISSUES	PJR	0.20	119.00
03/22/19	REVIEW, REVISE AND EXECUTE COLE SCHOTZ FINAL FEE APPLICATION	PJR	0.70	416.50
03/22/19	EMAIL EXCHANGE WITH L. KOTLER AND PREPARE NOTICE FOR BRACEWELL FINAL FEE APPLICATION	PVR	0.20	59.00

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03/22/19	CONFERENCE WITH P. REILLEY RE: COLE SCHOTZ FINAL FEE APPLICATION	PVR	0.20	59.00
03/22/19	EFILE AND COORDINATE SERVICE OF COLE SCHOTZ FINAL FEE APPLICATION	PVR	0.30	88.50
03/22/19	UPDATE CHART OF PROFESSIONAL FEES	PVR	0.10	29.50
03/22/19	EMAIL FROM AND TO L. KOTLER AND REVIEW AND REVISE BRACEWELL FINAL FEE APPLICATION AND PREPARE FOR FILING	PVR	0.40	118.00
03/22/19	EFILE AND COORDINATE SERVICE OF BRACEWELL FINAL FEE APPLICATION	PVR	0.30	88.50
03/22/19	CONFERENCE WITH P. REILLEY AND REVISE COLE SCHOTZ FINAL FEE APPLICATION	PVR	0.20	59.00
03/22/19	EFILE AND COORDINATE SERVICE OF COLE SCHOTZ FINAL FEE APPLICATION	PVR	0.30	88.50
03/25/19	EMAIL FROM AND TO T. MEIGHAN AND P. REILLEY AND REVIEW AND REVISE MERU FINAL FEE APPLICATION, AND RESEARCH RE: MERU RETENTION INFORMATION	PVR	0.40	118.00
03/25/19	REVIEW AND REVISE NOTICE RE: STATUS HEARING AND DISMISSAL OF CASES	PJR	0.20	119.00
03/25/19	REVIEW MERU FINAL FEE APPLICATION	PJR	0.20	119.00
03/25/19	UPDATE CHART OF PROFESSIONAL FEES	PVR	0.10	29.50
03/26/19	REVIEW MERU FINAL FEE APPLICATION, EXECUTE RELATED NOTICE AND EMAILS TO AND FROM T. MEIGHAN RE: SAME	PJR	0.30	178.50
03/26/19	EMAIL FROM T. MEIGHAN RE: MERU FINAL FEE APPLICATION AND REVIEW, REVISE AND PREPARE FOR FILING	PVR	0.70	206.50
03/26/19	EFILE AND COORDINATE SERVICE OF MERU FINAL FEE APPLICATION	PVR	0.30	88.50

PREPARATION FOR AND ATTENDANCE AT HEARINGS**0.60 \$177.00**

03/22/19	DRAFT NOTICE OF AGENDA FOR APRIL 24, 2019 FEE HEARING	PVR	0.20	59.00
03/22/19	BEGIN DRAFTING INDEX OF FEE APPLICATIONS FOR FEE HEARING	PVR	0.30	88.50
03/26/19	CONFERENCE WITH J. JOHNSON RE: FEE BINDER PREPARATION AND REVISE INDEX OF FEE APPLICATIONS	PVR	0.10	29.50

TOTAL HOURS 21.80

PROFESSIONAL SERVICES:

\$ 8,771.00

<u>TIMEKEEPER</u>	<u>STAFF LEVEL</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
PATRICK J. REILLEY	MEMBER	7.80	595.00	4,641.00

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<u>TIMEKEEPER</u>	<u>STAFF LEVEL</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
PAULINE Z. RATKOWIAK	PARALEGAL	14.00	295.00	4,130.00

COSTS ADVANCED

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/19/19	PHOTOCOPYING / PRINTING / SCANNING Qty: 4	0.40
03/19/19	PHOTOCOPYING / PRINTING / SCANNING Qty: 4	0.40
03/22/19	PHOTOCOPYING / PRINTING / SCANNING Qty: 14	1.40
03/26/19	PHOTOCOPYING / PRINTING / SCANNING Qty: 5	0.50
03/26/19	PHOTOCOPYING / PRINTING / SCANNING Qty: 2	0.20
TOTAL COSTS ADVANCED:		<u>\$ 2.90</u>

TOTAL SERVICES AND COSTS: \$ 8,773.90

Cole Schotz P.C.EO LIQUIDATING, LLC
160 CORPORATE COURT
MERIDEN, CT 06540

New York

New Jersey

Maryland

Texas

Florida

Re: **Client/Matter No. 56181-0001**
CHAPTER 11Invoice No. 834746
April 22, 2019

FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 18, 2019

<u>DATE</u>	<u>NARRATIVE</u>	<u>INITIALS</u>	<u>HOURS</u>	<u>AMOUNT</u>
CASE ADMINISTRATION			2.10	\$739.50
04/01/19	CONFERENCE WITH T. MEIGHAN RE: CASE STATUS, OPERATING REPORTS AND UST FEES	PJR	0.20	119.00
04/09/19	EMAIL TO D. MELORO RE: SD DECLARATION REGARDING PAYMENT OF CLAIMS	PJR	0.10	59.50
04/09/19	BEGIN DRAFTING CERTIFICATION OF COUNSEL RE: FINAL OMNIBUS FEE ORDER	PVR	0.20	59.00
04/11/19	UPDATE CHART OF PROFESSIONAL FEES	PVR	0.10	29.50
04/11/19	PREPARE CERTIFICATION OF NO OBJECTION RE: COLE SCHOTZ JANUARY - MARCH FEE APPLICATION	PVR	0.10	29.50
04/11/19	EFILE CERTIFICATION OF NO OBJECTION RE: COLE SCHOTZ JANUARY - MARCH FEE APPLICATION	PVR	0.20	59.00
04/12/19	EMAIL TO AND FROM L. KOTLER RE: FINAL FEE HEARING	PJR	0.10	59.50
04/12/19	PREPARE CERTIFICATION OF NO OBJECTION RE: COLE SCHOTZ FINAL FEE APPLICATION	PVR	0.10	29.50
04/12/19	EFILE CERTIFICATION OF NO OBJECTION RE: COLE SCHOTZ FINAL FEE APPLICATION	PVR	0.20	59.00
04/12/19	PREPARE CERTIFICATION OF NO OBJECTION RE: BRACEWELL COMBINED 10TH MONTHLY AND FINAL FEE APPLICATION	PVR	0.10	29.50
04/12/19	EFILE BRACEWELL COMBINED 10TH MONTHLY AND FINAL FEE APPLICATION	PVR	0.20	59.00
04/16/19	UPDATE CUMULATIVE CHART FOR CHAMBERS, UPDATE INDEX AND FEE BINDER RE: APRIL 24, 2019 HEARING	PVR	0.50	147.50
FEE APPLICATION MATTERS/OBJECTIONS			1.30	\$428.50
04/04/19	REVIEW AND REVISE EXHIBIT TO FEE APPLICATION RE: COMPLIANCE	PJR	0.30	178.50

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04/05/19	REVIEW MARCH INVOICE AND DRAFT SUPPLEMENT TO COLE SCHOTZ FINAL FEE APPLICATION	PVR	0.30	88.50
04/09/19	PREPARE MARCH 2019 STAFFING REPORT, AND MONTHLY COMPENSATION REPORT FOR FILING	JCW	0.30	61.50
04/15/19	PREPARE CERTIFICATE OF NO OBJECTION RE: MERU MARCH COMPENSATION REPORT	JCW	0.10	20.50
04/15/19	PREPARE CERTIFICATE OF NO OBJECTION TO MERU MARCH STAFFING REPORT	JCW	0.10	20.50
04/16/19	EFILE CERTIFICATION OF NO OBJECTION RE: MERU FINAL FEE APPLICATION	PVR	0.20	59.00
	LITIGATION/ GEN. (EXCEPT AUTOMATIC STAY RELIEF)		0.20	\$41.00
04/09/19	SEND CALENDAR INVITES RE: OBJECTION DEADLINE TO MONTHLY STAFFING REPORT, AND COMPENSATION REPORT, FOR MARCH 2019	JCW	0.10	20.50
04/09/19	REVIEW FILED 1) MONTHLY OPERATING REPORT, 2) MONTHLY STAFFING REPORT, AND 3) COMPENSATION REPORT, FOR MARCH 2019 AND DISTRIBUTE TO COUNSEL	JCW	0.10	20.50
	PREPARATION FOR AND ATTENDANCE AT HEARINGS		2.00	\$590.00
04/09/19	REVIEW AND REVISE FEE BINDER RE: APRIL 24, 2019 FEE HEARING	PVR	0.20	59.00
04/09/19	UPDATE INDEX RE: FEE BINDER FOR APRIL 24, 2019 HEARING	PVR	0.10	29.50
04/09/19	REVISE NOTICE OF AGENDA FOR APRIL 24, 2019 HEARING	PVR	0.10	29.50
04/11/19	CONFERENCE WITH P. REILLEY AND DRAFT CERTIFICATION OF COUNSEL, OMNIBUS ORDER AND EXHIBIT A RE: FINAL ALLOWANCE OF FEES	PVR	1.20	354.00
04/17/19	COORDINATE SUBMISSION OF FEE BINDER TO CHAMBERS RE: APRIL 24, 2019 FEE HEARING	PVR	0.10	29.50
04/17/19	EMAIL FROM P. REILLEY AND TO ALL BILLING PROFESSIONALS RE: APPROVAL OF DRAFT PROPOSED OMNIBUS FEE ORDER AND EXHIBIT A	PVR	0.30	88.50
	REPORTS; STATEMENTS AND SCHEDULES		0.20	\$119.00
04/03/19	EMAIL TO AND FROM T. MEIGHAN RE: REPORTING REQUIREMENTS	PJR	0.10	59.50
04/09/19	REVIEW OPERATING REPORT AND MERU STAFFING REPORT	PJR	0.10	59.50
	TOTAL HOURS		5.80	
	PROFESSIONAL SERVICES:			\$ 1,918.00

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<u>TIMEKEEPER</u>	<u>STAFF LEVEL</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
PATRICK J. REILLEY	MEMBER	0.90	595.00	535.50
PAULINE Z. RATKOWIAK	PARALEGAL	4.20	295.00	1,239.00
JOHN WHITWORTH	PARALEGAL	0.70	205.00	143.50

COSTS ADVANCED

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/25/19	DELIVERY SERVICES/COURIERS - PARCELS, INC Bank ID: 01 Check Number: 226089	18.00
	TOTAL COSTS ADVANCED:	<u>\$ 18.00</u>

TOTAL SERVICES AND COSTS: \$ 1,936.00