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

		·X	
		:	Chapter 11
In re:		:	
		:	Case No. 23-10671-BLS
PLASTIQ, INC., <i>et al.</i> , <sup>1</sup>		:	
		:	(Jointly Administered)
	Debtors.	:	
		:	Re: Docket No. 355
		-x	

## CERTIFICATE OF NO OBJECTION REGARDING FINAL FEE APPLICATION OF DUNDON ADVISERS LLC, FINANCIAL ADVISOR FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM JUNE 9, 2023, TO SEPTEMBER 29, 2023

I, Aaron S. Applebaum, an attorney with DLA Piper LLP (US) ("<u>DLA</u>"), counsel to the Official Committee of Unsecured Creditors in the above-captioned chapter 11 cases, hereby certify the following:

1. On November 13, 2023, Dundon Advisers LLC ("Dundon") filed the Final Fee

Application of Dundon Advisers LLC, Financial Advisor for the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from June 9, 2023, to September 29, 2023 [D.I. 355] (the "<u>Application</u>") with the Court.

2. Objections or responses to the Application were to be filed with the Court and served upon the undersigned counsel no later than 4:00 p.m. (prevailing Eastern Time) on December 4, 2023.

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Plastiq Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.



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3. As of the date hereof, neither Dundon nor DLA has been served with any objection or response to the Application. Further, a review of the Court's docket indicates that no responses or objections to the Application have been filed.

4. WHEREFORE, Dundon respectfully requests that the Court enter an order, substantially in the form of the proposed order attached hereto as <u>Exhibit A</u>, granting the relief requested in the Application, and grant such other and further relief as the Court deems just and proper.

Dated: December 13, 2023 Wilmington, Delaware Respectfully submitted,

## **DLA PIPER LLP (US)**

/s/ Aaron S. ApplebaumR. Craig Martin, Esq. (DE #5032)Aaron S. Applebaum, Esq. (DE #5587)1201 North Market Street, Suite 2100Wilmington, Delaware 19801-1147Telephone:(302) 468-5700Facsimile:(302) 394-2341Email:craig.martin@us.dlapiper.comaaron.applebaum@us.dlapiper.com

-and-

Dennis C. O'Donnell, Esq. (Admitted *pro hac vice*) 1251 Avenue of the Americas, 27th Floor New York, New York 10020-1104 Telephone: (212) 335-4500 Facsimile: 212) 335-4501 Email: dennis.odonnell@us.dlapiper.com

Counsel for the Official Committee of Unsecured Creditors

# Exhibit A

# **Proposed Order**

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

In re:

PLASTIQ, INC., et al.,

Chapter 11

Case No. 23-10671 (BLS)

Debtors.<sup>4</sup>

Obj. Deadline: December 4, 2023, at 4:00 p.m. (ET) Hearing Date: TBD

Related D.I.: 248, 311, 352

## ORDER APPROVING FINAL APPLICATION OF DUNDON ADVISERS LLC FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR <u>PERIOD FROM JUNE 8, 2023, THROUGH SEPTEMBER 29, 2023</u>

Upon consideration of the *Final Application of Dundon Advisers LLC for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors for the Period from June 9, 2023, through September 29, 2023* (the "<u>Application</u>") <sup>5</sup> of Dundon Advisers LLC ("<u>Dundon</u>"), for allowance of compensation and reimbursement of expenses incurred by Dundon during the Final Fee Period under sections 330(a) and 331 of the Bankruptcy Code and Bankruptcy Rule 2016; and the Court having jurisdiction over this matter pursuant 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012 (Sleet, C.J.); and notice of the Application being adequate under the

<sup>&</sup>lt;sup>4</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Plastiq Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.

<sup>&</sup>lt;sup>5</sup> Capitalized terms used but not defined in this Order shall have the meanings given to them in the Application.

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circumstances and no further or other notice of the Application being required; and after due deliberation and sufficient cause appearing therefor,

# **IT IS HEREBY ORDERED THAT:**

1. The Application is GRANTED, as set forth in this Order.

2. Dundon is allowed, on a final basis, compensation for services rendered and expenses incurred during the Final Fee Period in the sum of \$154,421.00.

3. The Debtors and the litigation trustee, as applicable, are hereby authorized and directed to pay Dundon the difference between \$154,421.00 and any interim payments made to Dundon with respect fees and expenses incurred during the Final Fee Period.

4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation or enforcement of this Order.