

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11
: :
: Case No. 23-10671-BLS
PLASTIQ, INC., *et al.*,¹ :
: (Jointly Administered)
Debtors. :
: Re: Docket No. 356
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**CERTIFICATE OF NO OBJECTION REGARDING FIRST AND
FINAL APPLICATION OF DLA PIPER LLP (US) 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 8, 2023, TO SEPTEMBER 29, 2023**

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

1. On November 13, 2023, DLA Piper, LLP (US) (“DLA Piper”) filed the *First and Final Application of DLA Piper LLP (US) 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 8, 2023, to September 29, 2023* [D.I. 356] (the “Application”) 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.

¹ 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.

3. As of the date hereof, DLA Piper has not 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**, DLA Piper respectfully requests that the Court enter an order, substantially in the form of the proposed order attached hereto as **Exhibit A**, 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. Applebaum

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*Counsel for the Official Committee of Unsecured
Creditors*

Exhibit A

Proposed Order

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

-----X
In re: : Chapter 11
: :
: Case No. 23-10671-BLS
PLASTIQ, INC., *et al.*,¹ :
Debtors. : (Jointly Administered)
: :
: **Related D.I.: 256, 315, 351**
: :
: **Obj. Deadline: Dec. 4, 2023, at 4:00 p.m. (ET)**
: :
-----X

**ORDER APPROVING FINAL APPLICATION OF DLA PIPER LLP (US)
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND FOR REIMBURSEMENT OF EXPENSES AS COUNSEL
TO OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
PERIOD FROM JUNE 8, 2023, THROUGH SEPTEMBER 29, 2023**

Upon consideration of the *Final Application of DLA Piper LLP (US) 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 8, 2023, through September 29, 2023* (the “Application”)² of DLA Piper LLP (US) (“DLA Piper”), for allowance of compensation and reimbursement of expenses incurred by DLA Piper during the Final Application 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

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² Capitalized terms used but not defined in this Order shall have the meanings given to them in the Application.

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. DLA Piper is allowed, on a final basis, compensation for services rendered and expenses incurred during the Final Application Period in the sum of \$609,534.82, including (a) compensation in the aggregate amount of \$608,477.00 and (b) reimbursement of actual and necessary expenses in the aggregate amount of \$1,057.82.
3. The Debtors and the Litigation Trustee, as applicable, are hereby authorized and directed to pay DLA Piper the difference between \$609,534.82³ and any interim payments made to DLA Piper with respect fees and expenses incurred during the Final Application 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.

³ The Litigation Trustee is further authorized and directed to pay DLA Piper additional fees and expenses, including in connection with the preparation, filing and prosecution of the Committee's professionals' final fee applications and additional assistance provided in connection with the transition to the Litigation Trust under the Plan, incurred through and including the entry of orders on such applications (the "Supplemental Fee Period"). DLA Piper shall invoice the Litigation Trustee directly for fees and expenses actually incurred during the Supplemental Fee Period.