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*Attorneys for the Debtors and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X
In re:	: Chapter 11
	: :
TGHI, INC., <u>et al.</u> ,	: Case No. 16-10300(MEW)
	: :
Debtors. <sup>1</sup>	: Jointly Administered
	: :
-----	X

**CERTIFICATE OF NO OBJECTION REGARDING FIRST  
AND FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES PURSUANT TO SECTION 330  
OF THE BANKRUPTCY CODE OF KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP, ATTORNEYS FOR THE DEBTORS**

Pursuant to Rule 9075-2 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), the undersigned hereby certifies as follows:

1. On September 22, 2016, Klestadt Winters Jureller Southard & Stevens, LLP (“KWJS&S” or “Applicant”) filed its First and Final Application for Allowance of Compensation and Reimbursement of Expenses Pursuant to Section 330 of the Bankruptcy Code of Klestadt Winters Jureller Southard & Stevens, LLP, Attorneys for the Debtors (the “KWJS&S Fee

<sup>1</sup> The Debtors and the last four digits of their taxpayer identification numbers are as follows: TGHI, Inc. (3814) and Parent THI, Inc. (5521).



Application”) [Docket No. 73].

2. The KWJS&S Fee Application and a notice thereof (the “Hearing Notice”) [Docket No. 76] were served on September 22, 2016 in accordance with the Federal Rules of Bankruptcy Procedures and the Local Rules. See Affidavit of Service of Lydia Pastor Nino, sworn to on September 28, 2016 [Docket No. 77].

3. Pursuant to the Hearing Notice mailed with the KWJS&S Fee Application, and in accordance with the Local Rules, any objections to the KWJS&S Fee Application were to be filed and served by no later than October 12, 2016 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

4. As of the date hereof, which is more than 48 hours after the Objection Deadline, no objection, responsive pleading, or request for a hearing with respect to the KWJS&S Fee Application has been filed or served on the Applicant, and Debtors’ counsel has reviewed the Court’s docket in these cases and no objection, responsive pleading or request for hearing with respect to the KWJS&S Fee Application appears thereon.

5. Applicant received informal comments from the Office of the United States Trustee. Those informal comments were resolved consensually. See Notice of United States Trustee’s Non-Objection to First and Final Fee Applications [Docket No. 79]. The resolution is reflected in the proposed form of order granting the KWJS&S Fee Application submitted to the Court for consideration.

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6. Accordingly, it is respectfully requested that the Court enter the proposed order, attached hereto as **Exhibit A**, granting the KWJS&S Fee Application.

Dated: New York, New York  
October 18, 2016

**KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP**

By: Joseph C. Corneau

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*Attorneys for the Debtors and Debtors-in-Possession*

**Exhibit A**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
TGHI, INC., <u>et al.</u> ,	:	Case No. 16-10300 (MEW)
	:	Jointly Administered
Debtors <sup>1</sup>	:	

**ORDER GRANTING FIRST AND FINAL APPLICATIONS FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Upon consideration of applications for allowance of compensation and reimbursement of expenses (the “Applications”) for professional services rendered and expenses incurred during the period from February 9, 2016 through September 14, 2016; and notice have been given pursuant to Federal Rules of Bankruptcy Procedure 2002(a)(7) and (c)(2); and due consideration having been given to any responses thereto; and sufficient cause having been shown therefor; it is hereby

ORDERED, that the Applications are granted to the extent set forth in Schedule A and Schedule B attached hereto.

Dated: New York, New York  
October \_\_, 2016

\_\_\_\_\_  
Honorable Michael E. Wiles  
United States Bankruptcy Judge

<sup>1</sup>The Debtors and the last four digits of their taxpayer identification numbers are as follows: Parent THI, Inc. (5521) and TGHI, Inc. (3814).

Case No. 16-10300(MEW)		<u>CURRENT INTERIM FEE PERIOD</u>						Schedule A
Case Name: In re TGHI, INC., et al.		[February 9, 2016-September 14, 2016]						
(1) Applicant	(2) Date/Document Number of Application	(3) Interim Fees Requested on Application	(4) Fees Allowed	(5) Fees to be Paid for Current Fee Period	(6) Fees to be Paid for Prior Fee Period(s) (if any) (i.e., Holdback Release)	(7) Total Fees to be Paid	(8) Interim Expenses Requested	(9) Expenses to be Paid for Current Fee Period
Klestadt Winters Jureller Southard & Stevens, LLP	9/22/2016-Dkt. No. 73.	\$124,797.50	\$124,797.50	\$124,797.50	N/A	\$124,797.50	\$3,264.45	\$3,236.95*
Kramer Levin Naftalis & Frankel LLP	9/22/2016-Dkt. No. 74.	\$100,694.50	\$100,694.50	\$100,694.50	N/A	\$100,694.50	\$418.99	\$418.99
Kurtzman Carson Consultants LLC	9/22/2016-Dkt. No. 75.	\$1,525.00	\$1,525.00	\$1,525.00	N/A	\$1,525.00	\$0.00	\$0.00
* Reflects reduction of \$27.50 pursuant to agreement with U.S. Trustee.								
			DATE ON WHICH ORDER WAS SIGNED: _____				INITIALS: _____ USBJ	

[illegible]