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*Attorneys for the Debtors and Debtors-in-
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**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. ¹ | : Jointly Administered |
| | : : |
| ----- | X |

**CERTIFICATE OF NO OBJECTION REGARDING
FIRST AND FINAL APPLICATION OF KRAMER LEVIN NAFTALIS &
FRANKEL LLP, AS SPECIAL COUNSEL FOR THE DEBTORS, FOR FINAL
ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES
RENDERED AND FOR REIMBURSEMENT OF ACTUAL AND NECESSARY
EXPENSES INCURRED FOR THE PERIOD FROM FEBRUARY 9, 2016
THROUGH AND INCLUDING SEPTEMBER 14, 2016**

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, Kramer Levin Naftalis & Frankel LLP ("KLN&F" or
"Applicant") filed its First and Final Application of Kramer Levin Naftalis & Frankel LLP, as
Special Counsel for the Debtors, for Final Allowance of Compensation for Professional Services

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



Rendered and for Reimbursement of Actual and Necessary Expenses Incurred for the Period From February 9, 2016 Through and Including September 14, 2016 (the “KLN&F Fee Application”) [Docket No. 74].

2. The KLN&F 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 KLN&F Fee Application, and in accordance with the Local Rules, any objections to the KLN&F 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 KLN&F 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 KLN&F Fee Application appears thereon.

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5. Accordingly, it is respectfully requested that the Court enter the proposed order, attached hereto as **Exhibit A**, granting the KLN&F Fee Application.

Dated: New York, New York
October 18, 2016

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

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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., et al., : Case No. 16-10300 (MEW)
: Jointly Administered
Debtors¹ :

**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

¹The 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]