## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	) Chapter 11
AMALGAM LIQUIDATION, LLC, et al., 1	) Case No. 23-90901 (MI)
Debtors.	) (Jointly Administered)
	) Re: Docket No. 422

CERTIFICATE OF NO OBJECTION TO
FIRST INTERIM AND FINAL FEE APPLICATION OF ANKURA CONSULTING
GROUP, LLC, AS FINANCIAL ADVISOR TO THE DEBTORS, FOR FINAL
ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED
AND REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED
FROM NOVEMBER 8, 2023 THROUGH AND INCLUDING MARCH 24, 2024

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* (the "<u>Complex Case Procedures</u>"), the undersigned proposed counsel for Amalgam Liquidation, LLC and its affiliated debtors and debtors-in-possession (collectively, the "<u>Debtors</u>") certifies as follows:

1. On March 29, 2024, Ankura Consulting Group, LLC filed its First Interim and Final Fee Application of Ankura Consulting Group, LLC, as Financial Advisor to the Debtors, for Final Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from November 8, 2023 Through and Including March 24, 2024 (Docket No. 422) (the "Application"). Attached to the Application was a proposed form of final order granting the relief requested in the Application (Docket No. 422-1). (the "Proposed Order"). Objections to the Proposed Order were required to be filed on or prior to April 19, 2024 (the "Objection Deadline").

The location of the Debtors' service address for purposes of these chapter 11 cases is: 7700 Anagram Drive, Eden Prairie, MN 55344.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the m

- 2. Attached hereto as **Exhibit A** is the form of Proposed Order filed as an exhibit to the Application.
- 3. In accordance with paragraph 44 of the Complex Case Procedures, the undersigned counsel files this Certificate of No Objection and represents to the Court that: (i) the Objection Deadline has passed; (ii) the undersigned counsel is unaware of any unresolved objection to the Application; and (iii) the undersigned counsel has reviewed the Court's docket and no objection to the Application appears thereon.
  - 4. The Debtors respectfully request entry of the Proposed Order.

Dated: April 20, 2024

Houston, Texas

Respectfully submitted,

By: <u>/s/ Tom A. Howley</u>

### **HOWLEY LAW PLLC**

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**-** and –

#### SIMPSON THACHER & BARTLETT LLP

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Counsel to the Debtors and the Debtors in Possession

### **Certificate of Service**

	I certify that, on	April 20, 2024,	, I caused	a copy	of the f	foregoing of	document to	be serv	ed by
the El	lectronic Case Fili	ng System for t	he United	States	Bankrup	ptcy Court	for the Sout	hern Di	istrict
of Tex	xas.								

/s/ Tom A. Howley
Tom A. Howley

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§				
AMALGAM LIQUIDATION, LLC, et al.,  Debtors. 1	S Chapter 11 S Case No. 22-90901 (MI) S (Jointly Administered) S				
FINAL ORDER ALLOWING COMPENSATION <u>AND REIMBURSEMENT OF EXPENSES</u> (Docket No)					
	inal Application for Compensation and Reimbursement of Group, LLC (the "Applicant"). The Court orders:				
1. Applicant is allowed cor of \$1,720,250.69 for the period set forth	mpensation and reimbursement of expenses in the amount in the application.				
±	reimbursement of expenses allowed in this order and all asation and reimbursement of expenses are approved on a				
3. The Debtors are authoriz 1 or 2 of this Order.	zed to disburse any unpaid amounts allowed by paragraphs				
Dated: , 2024 Houston, Texas					
	THE HONORABLE MARVIN ISGUR				

<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: Amalgam Liquidation, LLC (f/k/a Anagram Holdings, LLC) (8535); Amalgam Liquidation International, Inc. (f/k/a Anagram International, Inc.) (2523) and Amalgam Liquidation International Holdings, Inc. (f/k/a Anagram International Holdings, Inc.) (5837). The location of the Debtors' service address for purposes of these chapter 11 cases is: 7700 Anagram Drive, Eden Prairie, MN 55344.