



7. On March 29, 2023, the Court entered an order (the "Sale Order") granting the Trustee's motion to sell substantially all the Debtor's assets to Henry Do or his designee (the "Buyer"). See Docket No. 511.

8. On April 25, 2023, the Trustee and the Buyer completed the First Closing (as defined in the Sale Order). See Docket No. 514. On February 8, 2024, the Trustee and the Buyer completed the California Closing (as defined in the Sale Order). See Docket No. 558.

9. On February 15, 2024, the Court entered an order granting the Trustee's motion to change the Debtor's name so that the Buyer could use the name of TAG Mobile upon completion of the closing of the sale as provided in the Sale Order.

10. The Court converted the case to chapter 7 on March 26, 2024 (the "Conversion Date"). See Docket No. 570. The Trustee was appointed as the chapter 7 trustee.

#### **RELIEF REQUESTED**

11. By this Motion, the Trustee asks that the Court set a bar date for the filing of certain claims for post-petition, pre-conversion administrative expense claims under 11 U.S.C. § 503 (the "Chapter 11 Administrative Claims") that accrued between the Chapter 11 Commencement Date and the Conversion Date. Setting a bar date at this time will enable the Trustee to: (i) determine the amount of Chapter 11 Administrative Claims; and (ii) properly account for such claims as the Trustee concludes the administration of the Debtor's estate.

12. Section 503 of the Bankruptcy Code provides that any party can "timely file a request for payment of an administrative expense" and that such claim may be allowed after notice and a hearing. 11 U.S.C. §§ 503(a) and (b). In lieu of this requirement, the Trustee requests that holders of Chapter 11 Administrative Claims be required to assert such claims by submitting applications and supporting documentation as proposed herein. However, nothing in this Motion

is intended to, or shall, extend any otherwise applicable bar dates for administrative expense claims, including, without limitation, any bar date applicable to claims under Section 503(b)(9) of the Bankruptcy Code.

13. The Trustee submits that the Court may approve the Chapter 11 Administrative Claim procedure proposed herein pursuant to § 105 of the Bankruptcy Code, which permits the Court to "issue any order, process or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." The Trustee reasonably believes that the proposed procedure is fair and equitable and will permit judicial economy, and, therefore, should be approved in these cases.

#### **A. Chapter 11 Administrative Bar Date Procedures**

14. The Trustee asks that the Court set a deadline of forty-five (45) days after the entry of an Order granting this Motion as the bar date (the "Bar Date") for presenting all application (the "Applications") for allowance of Chapter 11 Administrative Claims.

15. The Trustee further requests that the court order that any Chapter 11 Administrative Claims not filed by the Bar Date be forever barred, and the Debtor's estate be relieved of any obligations to pay such claims. Additionally, such persons or entities that fail to timely file an application shall no longer receive notices from the Trustee regarding Chapter 11 Administrative Claims. The Order would not preclude any party from exercising its remedies against non-Debtor parties, or against property that is not property of the Debtor's estate.

16. In connection with the filing of Applications, the Trustee further requests as follows:

- a. Form. The Applications must be filed with the Court, with a copy to the undersigned counsel, on or before the Bar Date. Applications must: (i) describe

the amount and basis for the Chapter 11 Administrative Claim; (ii) be signed by the claimant or an authorized agent; and (iii) be accompanied by supporting documentation.

- b. Supporting Documentation. All documentation in support of Chapter 11 Administrative Claims shall be provided to the Trustee's counsel on the same date the Application is filed. Such documentation must include at the very least (i) proof of delivery of the goods or services; and (ii) copies of relevant contracts and invoices.

**B. Excluded Administrative Claims**

17. Administrative claims not subject to this Motion or the Bar Date are:
- a. administrative claims incurred after the Conversion Date, including claims of professionals retained pursuant to §§ 327 and/or 328 of the Bankruptcy Code, who may seek fees and expenses for their post-conversion services;
  - b. administrative expense claims that have already been allowed by order of the Court;
  - c. administrative expense claims held by a person or entity that has been paid in full pursuant to the Bankruptcy Code or in accordance with an order of the Court;
  - d. administrative expense claims held by a person or entity that has filed a motion requesting allowance of such administrative expense claim prior to the date of the Motion; and
  - e. the Chapter 11 Administrative Claim held by the Trustee for his services as the Chapter 11 Trustee, which the Trustee will submit for approval at the end of

this case along with his application for compensation as the Chapter 7 Trustee.

**C. Bar Date Notice Procedures**

18. Pursuant to 11 U.S.C. § 105, this Court can issue orders that are necessary or appropriate to carry out the provisions of the Bankruptcy Code. Bankruptcy courts routinely set deadlines for the filing of claims to assure the orderly administration of the cases before them.

19. The Trustee submits that setting the Bar Date forty-five (45) days after the entry of an Order granting this Motion and granting the related relief set for above, is both necessary and appropriate to assure the Trustee can properly analyze such claims and administer estate assets.

20. The Trustee shall mail notice of the Bar Date, substantially in the form of the notice attached hereto as Exhibit A to all creditors that have filed claims in the Bankruptcy Case and all other suspected creditors that the Trustee reasonably believes may be a holder of an Administrative Claim by first class mail no later than three (3) business days after entry of an Order approving this procedure.

WHEREFORE, the Trustee respectfully requests the Court enter an Order setting the Bar Date for filing applications for Chapter 11 Administrative Claims in this case. The Trustee requests such other and further Relief as this Court deems just and proper.

Dated: May 28, 2024.

Respectfully submitted,

/s/ Laurie Dahl Rea  
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PROPOSED COUNSEL FOR  
THE CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that, on May 28, 2024, a copy of this document was electronically filed in this case with the Clerk of the United States Bankruptcy Court by using the CM/ECF system, a copy was served on the parties who receive notice via the Court's ECF notification system, and a copy was served via first class U.S. mail on each of the parties set forth on the attached service list. On the same date, a copy of this document was emailed to the parties listed below:

Zed Lateef  
[zed@orchestrate.com](mailto:zed@orchestrate.com)

Mark Chevallier  
[mchevallier@mcslaw.com](mailto:mchevallier@mcslaw.com)

/s/ Laurie Dahl Rea  
Laurie Dahl Rea

EXHIBIT A

Notice of Bar Date

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COUNSEL FOR THE CHAPTER 7 TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	
	§	CHAPTER 7 CASE
GAT ELIBOM, LLC f/k/a TAG MOBILE,	§	
LLC	§	
	§	CASE NO. 17-33791-sgj-7
Debtor.	§	

**TRUSTEE'S NOTICE OF BAR DATE FOR FILING APPLICATIONS  
FOR CHAPTER 11 ADMINISTRATIVE EXPENSE CLAIMS**

THE COURT HAS SET A DEADLINE FOR FILING APPLICATIONS FOR ALLOWANCE OF CHAPTER 11 ADMINISTRATIVE CLAIMS UNDER 11 U.S.C. § 503 ("CHAPTER 11 ADMINISTRATIVE CLAIMS"). FAILURE TO FILE AN APPLICATION FOR ALLOWANCE OF CHAPTER 11 ADMINISTRATIVE CLAIMS BY THE BAR DATE WILL BAR THE HOLDERS OF SUCH CLAIMS FROM ASSERTING ANY CHAPTER 11 ADMINISTRATIVE CLAIMS AGAINST THE DEBTORS. THE DEADLINE TO FILE CHAPTER 11 ADMINISTRATIVE CLAIMS IS [45 DAYS FOLLOWING ENTRY OF ORDER APPROVING MOTION] (THE "**BAR DATE**").

PLEASE DO NOT CALL THE COURT, THE TRUSTEE, OR COUNSEL FOR THE TRUSTEE TO DETERMINE WHETHER YOUR RIGHTS ARE IMPACTED BY THIS NOTICE. YOU SHOULD CONSULT WITH YOUR OWN COUNSEL REGARDING THE FILING OF ANY CLAIM.

IF YOU INTEND TO FILE A CHAPTER 11 ADMINISTRATIVE CLAIM, PLEASE NOTE THAT FAILURE TO FOLLOW THE INSTRUCTIONS BELOW MAY RESULT IN A DISALLOWANCE OF YOUR CLAIM.

PLEASE TAKE NOTICE that if any application for Chapter 11 Administrative Claims<sup>1</sup> is not timely filed and served in accordance with this Notice on or before the Bar Date, the holder of such Chapter 11 Administrative Claim shall be forever barred, estopped, and enjoined from asserting such claims in any manner against the Trustee, the Debtor, or property of the bankruptcy estate.

Filing Instructions:

- A. Chapter 11 Administrative Claims are defined as those claims pursuant to 11 U.S.C. § 503 that arose between **February 2, 2018** (the date the case was converted to a chapter 11 bankruptcy case), and **March 26, 2024** (the date the bankruptcy case was converted to chapter 7).
- B. Notwithstanding this definition of Chapter 11 Administrative Claims, the following are excluded from the definition: (i) administrative claims incurred after March 26, 2024, including claims of professionals retained pursuant to §§ 327 and/or 328 of the Bankruptcy Code, who may seek fees and expenses for their post-conversion services; (ii) administrative expense claims that have already been allowed by order of the Bankruptcy Court; (iii) administrative expense claims held by a person or entity that has been paid in full pursuant to the Bankruptcy Code or in accordance with an order of the Bankruptcy Court; (iv) administrative expense claims held by a person or entity that has filed a motion requesting allowance of such administrative expense claim prior to the date of this Motion; and (v) the Chapter 11 Administrative Claim held by the Trustee for his services as the Chapter 11 Trustee, which the Trustee will submit for approval at the end of this case along with his application for compensation as the Chapter 7 Trustee.
- C. On or before the Bar Date, all applications for Chapter 11 Administrative Claims and all supporting documentation for such Administrative Claims should be filed with the Clerk of the Bankruptcy Court at 1100 Commerce Street, Room 1254, Dallas, Texas 75242-1496 or via the Court's Electronic Case Filing (ECF) system, and a copy of the application, including all supporting documentation, must be delivered to the Trustee's counsel at:

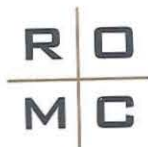
<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Trustee's Motion for Entry of an Order: (I) Fixing Bar Date for Filing of Certain Chapter 11 Administrative Expense Claims; and (II) Approving the Form and Manner of Notice of the Bar Date (the "Motion") [Dkt. No. ----].

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D. Applications must: (i) describe the amount and basis for the Chapter 11 Administrative Claim; (ii) be signed by the claimant or an authorized agent; and (iii) be accompanied by supporting documentation.

PLEASE TAKE NOTICE that the Bar Date is not applicable to post-conversion administrative claims of chapter 7 professionals for unpaid fees and expenses pursuant to §§ 330(a) and 503(b) of the Bankruptcy Code.

PLEASE TAKE NOTICE THAT THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CHAPTER 11 ADMINISTRATIVE CLAIM OR THAT THE TRUSTEE OR THE BANKRUPTCY COURT BELIEVE THAT YOU HAVE SUCH A CLAIM. The Trustee reserves the right to dispute or assert offsets or defenses against any filed Chapter 11 Administrative Claim on any grounds. Any questions concerning your rights in this case or whether you should file an application for payment of a Chapter 11 Administrative Claim should be directed to your own counsel.



ROCHELLE • McCULLOUGH  
LAWYERS

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