

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF SOUTH CAROLINA

In re:)	Chapter 11
)	
CAFÉ HOLDINGS CORP., et al.,)	Case No.: 18-05837 (hb)
)	
Debtors.)	

**SUPPLEMENTAL DECLARATION OF BRADFORD J. SANDLER IN SUPPORT
OF APPLICATION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR AUTHORIZATION TO RETAIN
AND EMPLOY PACHULSKI STANG ZIEHL & JONES LLP AS
BANKRUPTCY COUNSEL EFFECTIVE AS OF NOVEMBER 30, 2018**

I, Bradford J. Sandler, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, and pursuant to Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of South Carolina, that the following is true and correct:

1. I am a partner with the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZ&J” or the “Firm”), with offices located at 919 N. Market Street, 17th Floor, Wilmington, DE 19801. I am duly admitted to practice law in the states of Delaware, Pennsylvania, New Jersey and New York, the United States Supreme Court and the U.S. Court of Appeals third Circuit.

2. I submit this supplemental declaration (the “Declaration”) in further support of the *Application of the Official Committee of Unsecured Creditors for Authorization to Retain and Employ Pachulski Stang Ziehl & Jones LLP as Bankruptcy Counsel Effective as of November 30, 2018* (the “Application”).

3. This Declaration is made in response to informal inquiries by the Office of the United States Trustee. I will have primary responsibility for this engagement on behalf of the Firm. My rate is \$925.00 per hour. The primary attorneys who may help me on this engagement

and their hourly rates are: Maxim Litvak (\$875.00); Shirley Cho (\$850.00); and Steven W. Golden (\$495.00). In addition, the paralegals who work on this matter are billed at \$375.00 per hour. As discussed in the Application, to the extent that the Committee requests, PSZ&J will submit its interim and final fee applications at a 20% discount on its fees and will not seek payment of the “discounted” amount from PSZ&J’s normal rates unless and until the Committee approves such request, which will be in its sole discretion. PSZ&J will also waive any cost related to travel that it incurs in these cases.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 27, 2018

/s/ Bradford J. Sandler
Bradford J. Sandler