

2. The relief sought by this motion is based upon §§ 503(b) and 507(a) of the United States Bankruptcy Code (the “Bankruptcy Code”).

Background

3. The Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy on January 14, 2025 (the “Petition Date”).

4. The Debtor’s case was converted to Chapter 7 pursuant to the entry of an Order(I) Approving Eighth Stipulation Between Debtors and JPMorgan Chase Bank, N.A. Amending DIP Credit Agreement, (II) Converting Cases From Chapter 11 to a Chapter 7 of the Bankruptcy Code as of Conversion Date, (III) Approving Certain Conversion Procedures (IV) Setting Bar Date for Filing Final Chapter 11 Fee Applications and Establishing a Hearing Thereon, And (V) Granting Related Relief on December 19, 2025 at Dkt. No. 1089.

5. The Consignment Group’s Administrative Expense Claims are comprised of (a) 11 U.S.C. §503(b)(9) claims for the value of goods delivered to the Debtor in the twenty (20) days preceding the Petition Date (December 24, 2024 to January 14, 2025); (b) Postpetition goods delivered and unpaid (January 14, 2025 to May 15, 2025); and (c) Postpetition goods delivered and unpaid (May 16, 2025 to December 31, 2025), The Consignment Group has delivered goods for which they have not been paid as set forth below.

		Value of Goods Delivered 20 Days Prepetition - 12/24/24 to 1/14/25 – 11 USC §503(b)(9) Claim	Post-Petition Goods Delivered (January 14, 2025, through May 15, 2025)	Post- Petition Goods Delivered (May 15, 2025 through December 31, 2025)
Consignor	Total Administrative Claim			

Aspen MLT, LLC a/k/a Aspen Comics	\$2,490.36	\$513.09	\$1,977.27	\$0.00
Black Mask Studios, LLC	\$2,454.34	\$0.00	\$1,827.05	\$627.29
DSTLR Media, Inc.	\$20,022.72	\$0.00	\$2,011.12	\$18,011.60
Dynamic Forces, Inc. a/k/a Dynamite Entertainment	\$830,121.64	\$248,005.38	\$0.00	\$582,116.26
Heavy Metal International, LLC	\$70,728.74	\$0.00	\$65,543.71	\$5,185.03
Magnetic Press, LLC	\$44,089.86	\$9,116.96	\$23,540.96	\$11,431.94
Massive Publishing, LLC	\$166,443.70	\$22,455.00	\$56,641.50	\$87,347.20
Oni-Lion Forge Publishing Group, LLC f/k/a Oni Press, LLC	\$221,707.11	\$85,317.28	\$26,080.76	\$110,309.07
Panini UK Ltd.	\$7,129.37	\$0.00	\$564.58	\$6,564.79
Punk Bot Comic Books, LLC a/k/a Alien Books	\$64,558.87	\$0.00	\$64,558.87	\$0.00

The Penn State University a/k/a Graphic Mundi	\$59,431.00	\$4,990.00	\$54,441.00	\$0.00
Titan Publishing Group, Ltd.	\$103,314.15	\$0.00	\$44,301.35	\$59,012.80
Vault Storyworks, LLC a/k/a Vault Comics f/k/a Creative Mind	\$1.00	\$0.00	\$1.00	\$0.00
Dark Horse Comics, LLC	\$105,867.36	\$13,507.43	\$92,359.93	\$0.00
Total	\$1,698,360.22	\$383,905.14	\$433,849.10	\$880,605.98

Argument

6. By this Motion, the Consignment Group seeks allowance and payment of their respective Chapter 11 administrative expense claims in the amounts set forth above, (the “Chapter 11 Administrative Expense Claims”) as permitted under the Bankruptcy Code.

7. Section 503(b)(1) of the Bankruptcy Code provides that, after notice and a hearing, there shall be an allowed administrative expense claim for “the actual, necessary costs and expense of preserving the estate.” 11 U.S.C. § 503(b)(1)(A). “[A]n administrative expense claim will be allowed [under section 503(b)(1)(A) of the Bankruptcy Code] where the expense (1) arises post-petition; and (2) is beneficial to the Debtor’s estate.” *In re Lease-A-Fleet, Inc.*, 140 B.R. 840, 845 (Bankr. E.D. Pa. 1992). 11 U.S.C. § 507(a)(2) provides secondary priority to administrative expenses incurred during pendency of the Chapter 11 proceedings.

8. Here, the goods provided by the Consignment were provided to and/or sold by the Debtor after they were provided by the Consignment Group.

9. Further, the Consignment Group is entitled to an administrative claim for its attorneys' fees and interest pursuant to the extent of any bid agreements and/or under applicable non-bankruptcy law. A post-petition creditor is entitled to recover payments due under a contract, such as attorneys' fees, late fees, and interest, as administrative expenses if the debtor-in-possession's obligation has not been performed, or has not been modified by the court. *CIT Commun. Fin. Corp. v. Midway Airlines Corp. (In re Midway Airlines Corp.)*, 406 F.3d 229, 236 (4th Cir. 2005). The Consignment Group will supplement this Motion to the extent further attorneys' are may be properly sought in pursuing this administrative claim.

10. This Motion and the amounts sought herein are further reflected in the Proofs of Claims filed on behalf of the Consignment Group members for which additional supporting documentation is appended.

11. As Consignors retain legal title to their consigned inventory, Consignors' claims may be reduced to the extent said consigned inventory is returned to Consignors. Consignors collectively received \$144,000.00 in partial payment of their administrative claims, which amounts have yet to be applied ratably in reduction of the amounts sought herein. Consignors reserve all rights to amend this Motion and their respective Proofs of Claim in accordance with applicable law and/or file additional claims. Multiple adversary proceedings between the Consignors and the Trustee remain pending, the outcome of which may further impact the allowance of administrative claims sought herein, claims for damages incurred with respect to the rejection of executory contracts or the allowance of claims otherwise generally. Furthermore,

in the event that Chapter 7 Trustee or any other party with requisite standing objects to the Consignors claims on any ground, Consignors reserve the right to introduce additional documents/facts as necessary.

WHEREFORE, the Consignment Group respectfully requests that this Court enter an Order: (i) granting them allowed Chapter 11 administrative expense claims under §§ 503(b) and 507(a) of the Bankruptcy Code and as set forth herein; and (ii) granting such other relief as is just and equitable.

Dated: March 11, 2026

Respectfully submitted,

/s/ Craig M. Palik
McNamee Hosea, P.A.
Craig M. Palik, Esquire (Fed. Bar No. 15254)
6404 Ivy Lane, Suite 820
Greenbelt, MD 20770
Phone: 301-441-2420
cpalik@mhlawyers.com
Counsel for the Consignment Group

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2026, a true and correct copy of the foregoing *Motion for Approval of Administrative Expense* was served by the Court's ECF system the parties listed below.

Jan Berlage JBerlage@GHSLLP.com,
tcollins@ghsllp.com

Hugh M. (UST) Bernstein hugh.m.bernstein@usdoj.gov

Daniel Jack Blum jack.blum@polsinelli.com,
lsuprum@polsinelli.com,
delawaredocketing@polsinelli.com

Laura Skowronski Bouyea lsbouyea@venable.com,
dmdierdorff@venable.com

Thomas K. Bredar thomas.bredar@wilmerhale.com,
andrew.goldman@wilmerhale.com,
benjamin.loveland@wilmerhale.com,
yolande.thompson@wilmerhale.com

Andrew Brown abrown@klestadt.com

Richard L. Costella rcostella@tydings.com,
scalloway@tydings.com,
zjones@tydings.com,
swilliams@tydings.com

David W.T. Daniels ddaniels@perkinscoie.com,
docketnyc@perkinscoie.com,
nvargas@perkinscoie.com,
KMcClure@perkinscoie.com

Emily Devan edevan@milesstockbridge.com

Turner Falk turner.falk@saul.com,
tnfalk@recap.email,
Veronica.Marchiondo@saul.com

Justin Philip Fasano jfasano@mhlawyers.com,
jfasano@ecf.courtdrive.com,
tmackey@mhlawyers.com,

mevans@mhlawyers.com,
cmartin@mhlawyers.com,
Fasano.JustinR92003@notify.bestcase.com

Ashley N Fellona ashley.fellona@saul.com,
janice.mast@saul.com

Gianfranco Finizio gfinizio@lowenstein.com

Adam Fletcher afletcher@bakerlaw.com

Chelsea R Frankel cfrankel@lowenstein.com

Stephen B. Gerald sgerald@tydings.com

Christopher J. Giaimo christopher.giaimo@squirepb.com,
christopher.giaimo@squirepb.com,
christopher-j-giaimo-6409@ecf.pacerpro.com

Jonathan A. Grasso jgrasso@yvslaw.com,
pgomez@yvslaw.com,
r39990@notify.bestcase.com

Zvi Guttman zvi@zviguttman.com,
zviguttman@gmail.com,
zviguttman@outlook.com

Jeffrey C. Hampton jeffrey.hampton@saul.com

Adam H Isenberg adam.isenberg@saul.com

Toyja E. Kelley toyja.kelley@lockelord.com

C. Kevin Kobbe kevin.kobbe@us.dlapiper.com,
docketing-baltimore-0421@ecf.pacerpro.com

Eric George Korphage korphagee@whiteandwilliams.com

Jung Yong Lee jlee@tydings.com,
mhickman@tydings.com

Gary H. Leibowitz gleibowitz@coleschotz.com,
pratkowiak@coleschotz.com,
bankruptcy@coleschotz.com,

lmorton@coleschotz.com

Mark Minuti mark.minuti@saul.com,
robyn.warren@saul.com

Bruce S. Nathan bnathan@lowenstein.com

Michael Papandrea mpapandrea@lowenstein.com

Steven Gregory Polard steven.polard@ropers.com,
loriann.zullo@ropers.com,
anthony.arriola@ropers.com

Scott Prince sprince@bakerlaw.com

Jordan Rosenfeld jordan.rosenfeld@saul.com

Nikolaus F. Schandlbauer nick.schandlbauer@arlaw.com,
lianna.sarasola@arlaw.com

Elizabeth Anne Scully escully@bakerlaw.com

Dennis J. Shaffer dshaffer@tydings.com,
scalloway@tydings.com,
mhickman@tydings.com,
jlee@tydings.com

Indira Kavita Sharma indira.sharma@troutman.com,
katherine.culbertson@troutman.com,
jonathan.young@troutman.com,
david.ruediger@troutman.com,
errol.chapman@troutman.com,
toyja.kelley@troutman.com

Nicholas Smargiassi nicholas.smargiassi@saul.com

Brent C. Strickland bstrickland@wtplaw.com,
mbaum@wtplaw.com,
brent-strickland-3227@ecf.pacerpro.com

Paige Noelle Topper paige.topper@saul.com

US Trustee - Baltimore USTPRegion04.BA.ECF@USDOJ.GOV

Zvi Guttman zvi@zviguttman.com zviguttman@gmail.com, zviguttman@outlook.com,
MD55@ecfbis.com

Morgan Fisher mwf@morganfisherlaw.com>

Drew Dillworth DDillworth@stearnsweaver.com

Eric Silver esilver@stearnsweaver.com

Matthew Graham mgraham@stearnsweaver.com

Carmen Veguilla cveguilla@stearnsweaver.com

/s/ Craig M. Palik

Counsel for the Consignment Group