

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
)  
GULF PACKAGING, INC.,<sup>1</sup> ) Case No. 15-15249  
)  
Debtor. ) Hon. Pamela S. Hollis  
)  
)  
)  
)

**SUPPLEMENT TO FIRST INTERIM FEE APPLICATION OF FREEBORN & PETERS  
LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS, APPROVAL OF REIMBURSEMENT OF COMMITTEE MEMBER  
EXPENSE AND REQUEST FOR APPROVAL OF LIMITED NOTICE**

At the November 17, 2015 hearing on the First Interim Fee Application of Freeborn & Peters LLP as Counsel to the Official Committee of Unsecured Creditors (the “*First Interim Fee Application*”),<sup>2</sup> the Court stated that the exhibits to the First Interim Fee Application contained certain discrepancies between the amount of time listed for individual tasks and the total time listed for certain narratives and asked Freeborn & Peters LLP (“*F&P*”) to supplement the First Interim Fee Application to correct those discrepancies.

F&P has corrected the discrepancies. Revised invoices are attached hereto as Group Exhibit 1, and redline versions of the invoices are attached hereto as Group Exhibit 2. As noted in the corrected invoices, F&P’s fees actually *increased* by \$1,016.00. F&P does not, however, seek this additional amount in the interim fee application, but reserves the right to do so in connection with its final fee application.

Accordingly, as originally requested in the First Interim Fee Application, F&P seeks the entry of an order:

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<sup>1</sup> The last four digits of the Debtor’s tax identification number are 5030.

<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the First Interim Fee Application.

(a) allowing F&P, on an interim basis, \$191,289.00 in compensation for the Fee Application Period as chapter 11 administrative expenses of the Debtor's estate pursuant to sections 503(b) and 507(a)(1) of the Bankruptcy Code;

(b) allowing F&P, on an interim basis, \$680.80 in reimbursable expenses for the Fee Application Period as chapter 11 administrative expenses of the Debtor's estate pursuant to sections 503(b) and 507(a)(1) of the Bankruptcy Code;

(c) authorizing payment to F&P of \$38,334.04, representing all unpaid amounts owing to F&P on account of the First Interim Fee Application;

(d) allowing Committee member Signode Industrial Group, on an interim basis, \$41.00 in reimbursable expenses as a chapter 11 administrative expense of the Debtor's estate pursuant to sections 503(b) and 507(a)(1) of the Bankruptcy Code;

(e) approving limited notice of this First Interim Fee Application as requested herein;  
and

(f) granting such other and further relief as the Court deems just and proper.

Dated: December 3, 2015

**OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF GULF PACKAGING, INC.**

By: /s/ Devon J. Eggert  
One of Its Attorneys

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