IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE YOGAWORKS, INC., *et al*, Debtors.[1]	Chapter 11 Case No. 20-12599-KBO (Jointly Administered)

CERTIFICATION OF COUNSEL
REGARDING PROPOSED ORDER ALLOWING
ADMINISTRATIVE CLAIM OF SARAH GREEN AND CARI GILBERT
(relates to Docket No. 379)

Adam Hiller, counsel for Sarah Green and Cari Gilbert ("Class Claimants" or "Movants") in the above-captioned cases, hereby certifies as follows:

1. On March 24, 2021, Class Claimants filed a Motion For Allowance of Administrative Claims (Docket No. 379) (the "Motion") as putative class representatives of certain classes of prepetition creditors. On April 19, 2021, the undersigned filed a Supplemental Declaration in support of the Motion (Docket No. 402) (the "Supplemental Declaration").

2. After the filing, counsel for the United States Trustee provided informal comments to the relief requested in the Motion, as a result of which Class Claimants filed the Supplemental Declaration and made certain revisions to the proposed form

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are (1) YogaWorks, Inc., a Delaware corporation (9105); and (2) Yoga Works, Inc., a California corporation (0457).

of order submitted with the Motion, which is attached hereto as **Exhibit A** (the "Revised Proposed Order"). A redline of the changes against the proposed order submitted with the Motion is attached hereto as **Exhibit B**. Specifically, these revisions disclosed the allocation of how Movants' administrative claim will be allocated: costs incurred by CounselOne (out-of-pocket expenses, as well as fees and expenses incurred by Hiller Law, LLC, which were paid by CounselOne) and the respective 60% amount payable to Movants and 40% fee due to CounselOne under their client engagement agreement. It is my understanding from CounselOne that both CounselOne and Movants have agreed to this distribution.

3. The attorney for the United States Trustee, Benjamin Hackman, has advised me that, subject to the filing of the Supplemental Declaration, he does not oppose entry of the Revised Proposed Order by the Court.

4. The notice of the Motion provides that objections were due by April 7, 2021, which was extended for the United States Trustee by Movants' agreement. The undersigned has received no other response to the Motion. A review of the docket in this proceeding indicates that no formal objection or response has been filed in connection with the Motion.

5. Movants therefore request that the Court enter the Revised Proposed Order as an order of the Court at the Court's convenience.

Dated: April 19, 2021
Wilmington, Delaware

Respectfully submitted,

HILLER LAW, LLC

/s/ Adam Hiller

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