

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Baltimore Division)**

**In re:** \*  
**Diamond Comic Distributors, Inc., et. al,** \* **Case No. 25-10308-DER**  
**Debtors.<sup>1</sup>** \* **(Jointly Administered)**  
\* **Chapter 7**

\* \* \* \* \*  
**TRUSTEE’S APPLICATION TO EMPLOY SC&H GROUP, INC.**  
**AS FINANCIAL ADVISOR AND LITIGATION SUPPORT CONSULTANT FOR THE**  
**CHAPTER 7 TRUSTEE PURSUANT TO 11 U.S.C. §§ 327 AND 328**

Morgan W. Fisher, Chapter 7 Trustee (the “Trustee”) for the above captioned Debtors, files this application (the “Application”) for entry of an order pursuant to §§ 327 and 328 of the United States Bankruptcy Code, 11 U.S.C. § 101, *et seq.* (the “Bankruptcy Code”) and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), authorizing the Trustee to retain and employ SC&H Group, Inc. (“SC&H”) as a financial advisor and litigation support consultant for the Trustee. In support of the Application, the Trustee submits the Verified Statement of Robert L. Patrick (the “Verified Statement”) filed herewith as **Exhibit A** and incorporated herein by reference, and respectfully represents as follows:

**JURISDICTION**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the Debtor’s chapter 7 case and this Application is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are Bankruptcy Code §§ 327 and 328 and Bankruptcy Rule 2014(a).

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<sup>1</sup> The Debtors in these chapter 7 cases are: Diamond Comic Distributors, Inc.; Comic Holdings, Inc.; Comic Exporters, Inc.; and Diamond Select Toys & Collectibles, LLC.

**BACKGROUND**

3. On January 14, 2025 (the “Petition Date”), Diamond Comic Distributors, Inc., Comic Holdings, Inc., Comic Exporters, Inc., and Diamond Select Toys & Collectibles, LLC (collectively, the “Debtors”) each commenced a case (the “Bankruptcy Cases”) under chapter 11 of the United States Bankruptcy Code.

4. On January 16, 2025, the Court granted the Debtors’ Motion for Joint Administration and ordered the Debtors’ cases to be jointly administered under *In re: Diamond Comic Distributors, Inc., et. al.*, 25-10308 [ECF No. 41].

5. Information regarding the Debtor’s history and business operations, capital structure, and secured indebtedness, and the events leading up to the commencement of these Bankruptcy Cases can be found in the *Declaration of Robert Gorin in Support of First Day Relief*, filed with the Court on the Petition Date at ECF No. 20.

6. On December 12, 2025, the Debtors filed a Motion (A) For Entry of Order Approving Eighth Stipulation between Debtors and JPMorgan Chase Bank, N.A., Amending DIP Credit Agreement and (B) For Approval of Order (i) Converting Cases From Chapter 11 To Chapter 7 of the Bankruptcy Code as of the Conversion Date, (ii) Approving Certain Conversion Procedures, (iii) Setting Bar Date For Filing Final Chapter 11 Fee Applications and Establishing a Hearing Thereon, and (iv) Granting Related Relief (the “Motion to Convert”) [ECF No. 1070].

7. On December 19, 2025, this Court entered an Order granting the Debtor’s Motion to Convert [*See Order*, ECF No. 1089].

8. On December 23, 2025, the United States Trustee’s Office appointed Morgan Fisher as Interim Trustee and Designation of Required Bond. [ECF No. 1095.]

9. On January 1, 2026, Morgan Fisher became the duly appointed interim Chapter 7 Trustee for the Debtors' bankruptcy estates and is so acting pursuant to 11 U. S. C. §702(d). The Trustee has accepted his appointment, has qualified, and is acting in that capacity

10. The Trustee has selected SC&H as his financial advisor and litigation support consultant to represent the best interests of the Debtors' estates.

**RELIEF REQUESTED**

11. By this Application, the Trustee seek authority to employ SC&H as his financial advisor and litigation support consultant pursuant to the terms set forth in the Engagement Letter dated as of April 2, 2026 and attached hereto as **Exhibit B** (the "Engagement Letter"). The Trustee seeks the employment of SC&H to represent his interests and perform services for them in connection with carrying out his fiduciary duties under the Bankruptcy Code. If and as the need arises, the Trustee may request that SC&H perform additional services that will be set forth in one or more additional agreements between the Trustee and SC&H.

12. Robert L. Patrick, a Managing Director of SC&H, who will have primary responsibility for the services provided to the Trustee has extensive experience in bankruptcy financial advisory and litigation support planning and strategies (including, without limitation, avoidance action analysis, valuation work, insolvency analysis and general damages analysis) for individuals and entities both inside and outside of bankruptcy.

13. The Trustee wishes to employ SC&H to render certain advisory services, including, but not limited to, assisting the Trustee with the following:

- Assist the Client with the review and analysis of the Debtors' §547 causes of action, including a review of potential defenses available to the targets consistent with the requirements of §547(b) as amended by the Small Business Reorganization Act of 2019 ("SBRA").

- Prepare schedules of preference transfers suitable for inclusion with demand letters and preference complaints.
- Assist the Client in the negotiation and compromise of the individual preference claims.
- Assist the Client in the review and prosecution of §548 claims as requested.
- Assist the Client with such other services as Client may deem necessary and consistent with the role of a financial advisor.

**COMPENSATION**

14. Subject to the approval of this Court, SC&H will charge the Trustee for its services on an hourly basis in accordance with its ordinary and customary rates. SC&H’s rates are subject to annual adjustment to reflect economic and market conditions. The Trustee has been advised by SC&H that the current hourly rates that will be charged in respect of the primary members of SC&H’s engagement team are as follows:

Managing Director/Principal	\$525 - \$700
Senior Manager/Manager	\$375 - \$500
Senior/Staff	\$300 - \$350

15. In addition to the hourly rates identified above, SC&H customarily charges clients for actual and necessary costs of support services the firm provides in connection with an engagement, including, without limitation, research, photocopying charges, long distance telephone calls, facsimile transmissions, messengers, courier mail, temporary services, travel, lodging and catering for meetings. SC&H will charge the cost of these expenses in a manner and at rates consistent with charges generally made to the firm’s other clients and in compliance with the guidelines of the Office of the U.S. Trustee. All such charges will be subject to Court approval and administrative procedures established by order of the Court.

16. SC&H will use every effort to staff the engagement in a cost-effective manner and will work with other professionals involved in these cases to avoid duplication of effort.

17. Based on the Verified Statement, the Trustee believes that SC&H does not hold any interest adverse to any of the Debtors' estates and, while employed by the Trustee, will not represent any person having an interest adverse to the Trustee and the Debtor's estate. The Trustee believes that SC&H is a "disinterested person" as that term is defined in § 101(14) of the Bankruptcy Code.

18. The Trustee believes that the employment of SC&H is necessary and in the best interests of the Debtors' estates, enabling the Trustee to carry out his fiduciary duties under the Bankruptcy Code.

**STATEMENT PURSUANT TO LOCAL BANKRUPTCY RULE 9013-2**

19. Pursuant to Rule 9013-2 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the District of Maryland, the Trustee states that, in lieu of submitting a memorandum in support of this Application, they will rely solely upon the grounds and authorities set forth herein.

WHEREFORE, the Trustee requests that this Court:

- A. Authorize the employment of SC&H as the Trustee's financial advisor and litigation support consultant as set forth herein;
- B. Authorize the Trustee to compensate SC&H for services provided and reimbursement of expenses in connection with its employment in these Bankruptcy Cases, subject to further application and approval of this Court, including any fee payment orders the Court enters; and
- C. Grant such other and further relief as is just and appropriate under the circumstances.

Dated: April 9, 2026

/s/ Richard M. Goldberg

Richard M. Goldberg, Fed. Bar No. 07994

Daniel J. Zeller, Fed. Bar No. 28107

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*Proposed General Bankruptcy Counsel  
to Morgan Fisher, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 9th day of April, 2026, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing will be served electronically by the Court's CM/ECF system on the following:

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