## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Saga Formations, Inc., et al., 1

Debtors.

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

Re D.I. 1002

# CERTIFICATE OF NO OBJECTION REGARDING TRUSTEE'S THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO A CERTAIN (I) LATE-FILED CLAIM AND (II) AMENDED AND SUPERSEDED CLAIM

The undersigned hereby certifies that, as of the date hereof, Pashman Stein Walder Hayden, P.C. ("Pashman") has received no answer, objection or other responsive pleading to the *Trustee's* Third Omnibus Objection (Non-Substantive) to a Certain (i) Late-Filed Claim and (ii) Amended and Superseded Claim (the "Third Omnibus Objection") [D.I. 1002] filed on October 28, 2025.

Pursuant to the Notice of Third Omnibus Objection, responses to the Third Omnibus Objection were to be filed and served no later than November 18, 2025, at 4:00 p.m. (ET). The undersigned further certifies that Pashman has caused a review of the Court's docket in these Chapter 11 Cases and that no answer, objection or other responsive pleading to the Third Omnibus Objection appears thereon.

WHEREFORE, the Trustee respectfully requests that the Order attached to the Third Omnibus Objection as **Exhibit B** be entered at the earliest convenience of the Court.

The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758); and Tangible Play, Inc. (9331).



Dated: November 19, 2025 Wilmington, Delaware

### PASHMAN STEIN WALDER HAYDEN, P.C.

#### /s/ Alexis R. Gambale

Henry J. Jaffe (No. 2987)

Joseph C. Barsalona II (No. 6102)

Alexis R. Gambale (No. 7150)

824 N. Market Street, Suite 800

Wilmington, DE 19801

Telephone: (302) 592-6496

Email: hjaffe@pashmanstein.com

jbarsalona@pashmanstein.com agambale@pashmanstein.com

-and-

#### **JENNER & BLOCK LLP**

Catherine Steege (admitted *pro hac vice*)
Melissa Root (admitted *pro hac vice*)
William A. Williams (admitted *pro hac vice*)
353 N. Clark Street
Chicago, Illinois 60654
Telephone: (312) 923-2952

Telephone: (312) 923-2952
Email: csteege@jenner.com
 mroot@jenner.com
 wwilliams@jenner.com

Co-counsel to the Trustee