

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

F21 OPCO, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10469 (MFW)

(Jointly Administered)

Ref: Docket No. 597

**CERTIFICATE OF NO OBJECTION  
REGARDING PLAN ADMINISTRATOR'S MOTION FOR ENTRY OF AN  
ORDER EXTENDING THE DEADLINE TO FILE NOTICES TO REMOVE ACTIONS**

The undersigned hereby certifies that:

1. On August 19, 2025, Steven Balasiano of MHR Advisory Group, LLC, not individually, but solely in his capacity as the Plan Administrator (the "Plan Administrator"), filed and served its *Plan Administrator's Motion for Entry of an Order Extending the Deadline to File Notices to Remove Actions* (the "Motion").<sup>2</sup>

2. Objections to the Motion were to be filed and served no later than August 28, 2025, by 4:00 p.m. (prevailing Eastern Time). After reviewing the dockets in the above-captioned cases, the undersigned certifies that no answer, objection, or other responsive pleading to the Motion appears thereon. Additionally, no objections to the Motion have been received by the undersigned counsel.

3. As no responses to the Motion have been received, it is hereby respectfully requested that the proposed order attached to the Motion as **Exhibit A** be entered at the earliest convenience of the Court.

<sup>1</sup> The Debtors in these cases are: F21 OpCo, LLC; F21 Puerto Rico, LLC; and F21 GiftCo Management, LLC.

<sup>2</sup> Docket No. 597.



Dated: August 29, 2025

**COLE SCHOTZ, P.C.**

/s/ Stacy L. Newman

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