

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

In re:

F21 OPCO, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10469 (MFW)

(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING PROPOSED
ORDER SCHEDULING OMNIBUS HEARING DATE**

The undersigned counsel to Steven Balasiano, solely in his capacity as the Plan Administrator (the “Plan Administrator”) of F21 OpCo, LLC, *et al.* in the above-captioned chapter 11 cases, hereby certifies the following:

1. Counsel to the Plan Administrator, through communication with the Chambers of The Honorable Mary F. Walrath, received an omnibus hearing date.
2. Attached hereto as **Exhibit A** is a proposed Order Scheduling Omnibus Hearing Date (the “Proposed Order”) that states with specificity the date and time of the omnibus hearing scheduled, subject to Court approval.
3. The Plan Administrator respectfully requests that the Proposed Order be entered at the earliest convenience of the Court.

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¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: F21 OpCo, LLC (8773); F21 Puerto Rico, LLC (5906); and F21 GiftCo Management, LLC (6412). The Debtors’ address for purposes of service in these Chapter 11 Cases is 110 East 9th Street, Suite A500, Los Angeles, CA 90079.



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Dated: November 12, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Stacy L. Newman

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Counsel to the Plan Administrator

Exhibit A

Proposed Order

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(Jointly Administered)

ORDER SCHEDULING OMNIBUS HEARING DATE

Pursuant to Del. Bankr. L.R. 2002-1(a), IT IS HEREBY ORDERED that the following omnibus hearing is scheduled in the above-captioned cases:

DATE

December 17, 2025

TIME

3:00 p.m. (ET)