

**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)

Related Docket No. 630

**NOTICE OF SUBMISSION OF PROOFS OF CLAIM FOR THE PLAN
ADMINISTRATOR'S SECOND OMNIBUS (SUBSTANTIVE)
OBJECTION TO CLAIMS (RECLASSIFIED CLAIMS)**

PLEASE TAKE NOTICE that on November 17, 2025, Steven Balasiano of MHR Advisory Group, LLC, not individually, but solely in his capacity as the Plan Administrator (the "Plan Administrator"), filed the *Plan Administrator's Second Omnibus (Substantive) Objection to Claims (Reclassified Claims)* [Docket No. 630] (the "Second Omnibus Objection") with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801. A hearing to consider the Second Omnibus Objection is scheduled for December 17, 2025 at 3:00 p.m. (ET).

PLEASE TAKE FURTHER NOTICE that a claims binder was hand delivered on December 3, 2025 to the Judge's Courtroom Deputy and Judicial Assistant, with copies of the proofs of claim (the "Proofs of Claim") that are the subject of the Second Omnibus Objection, along with all supporting documentation and a copy of the Second Omnibus Objection, in accordance with Rule 3007-1(d)(vi) of the Local Rules of the United States Bankruptcy Court for the District of Delaware. Copies of the Proofs of Claim can be requested from counsel to the Plan Administrator.

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



Dated: December 3, 2025
Wilmington, DE

COLE SCHOTZ, P.C.

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