

**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)

Re: Docket No. 629

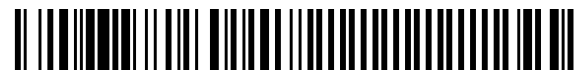
**CERTIFICATE OF NO OBJECTION REGARDING PLAN ADMINISTRATOR’S
FIRST OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN
(I) LATE FILED CLAIMS; (II) AMENDED AND SUPERSEDED CLAIMS;
AND (III) DUPLICATIVE CLAIMS**

The undersigned counsel to Steven Balasiano of MHR Advisory Group, LLC, not individually, but solely in his capacity as the Plan Administrator (the “Plan Administrator”), hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading has been filed or received to the *Plan Administrator’s First Omnibus (Non-Substantive) Objection to Certain (I) Late Filed Claims; (II) Amended And Superseded Claims; and (III) Duplicative Claims* [Docket No. 629] (the “Objection”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) on November 17, 2025. Responses to the Objection were to be filed and served no later than December 8, 2025 at 4:00 p.m. (ET) (the “Response Deadline”).

The Response Deadline has passed, and no responses or other responsive pleading to the Objection appear on the docket or were served upon the undersigned counsel. It is therefore respectfully requested that the Court enter the proposed order attached to the Objection at the earliest convenience of the Court.

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



Dated: December 11, 2025

COLE SCHOTZ, P.C.

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