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

In re:

Chapter 11

F21 OPCO, LLC, et al.,

Case No. 25-10469 (MFW)

(Jointly Administered)

Debtors.<sup>1</sup>

Related Docket No. 640

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

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to the *Plan Administrator's Motion for Entry of an Order Further Extending the Deadline to File Notices to Remove Actions* [Docket No. 640] (the "Motion") filed on December 2, 2025 with the United States Bankruptcy Court for the District of Delaware (the "Court").

The undersigned further certifies that he has reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Motion appears thereon. Objections to the Motion were to be filed and served no later than December 10, 2025 at 4:00 p.m. (ET) (the "Objection Deadline").

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.

The Objection Deadline has passed and no objections appear on the docket or were served upon the undersigned counsel. It is hereby respectfully requested that the proposed order attached to the Motion be entered at the convenience of the Court.

Dated: December 12, 2025 Wilmington, Delaware

## COLE SCHOTZ P.C.

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126) Stacy L. Newman (No. 5044) 500 Delaware Avenue, Suite 600

Wilmington, DE 19801 Tel: (302) 652-3131 (302) 652-3117 Fax:

Email: jalberto@coleschotz.com snewman@coleschotz.com

-and-

Sarah A. Carnes (admitted *pro hac vice*) 1325 Avenue of the Americas, 19th Floor New York, NY 10019

(212) 752-8000 Tel: (212) 752-8393 Fax:

Email: scarnes@coleschotz.com

-and-

## McDermott Will & Emery LLP

Darren Azman (admitted *pro hac vice*) Kristin K. Going (admitted *pro hac vice*) One Vanderbilt Avenue New York, NY 10017

Tel: (212) 547-5400 (212) 547-5444 Fax: Email: dazman@mwe.com

kgoing@mwe.com

Counsel to the Official Committee of **Unsecured Creditors**