

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

In re:

HRI HOLDING CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-12415 (MFW)
(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF ANTHONY M. SACCULLO IN SUPPORT OF
SECOND OMNIBUS OBJECTION (SUBSTANTIVE) OF THE
PLAN ADMINISTRATOR TO CERTAIN PROOFS OF CLAIM**

I, Anthony M. Saccullo, hereby declare under penalty of perjury:

1. I am the Plan Administrator (“Plan Administrator”) for the estate of HRI Holding Corp., et al. (the “Debtors”), under the Debtors’ confirmed plan of reorganization. In such capacity, I have become, and am, generally familiar with the Debtors’ overall day-to-day operations, business and financial affairs, and books and records. I am above 18 years of age, and I am competent to testify.

2. I have read the *Second Omnibus Objection (Substantive) of the Plan Administrator* (the “Objection”)² and am directly, or by and through the advisors, consultants, and personnel of the Plan Administrator, the Debtor, and KCC (the “Claims Agent”), familiar with the information contained therein and the exhibits attached thereto. Except as otherwise indicated, all facts set

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: HRI Holding Corp. (4677), Houlihan’s Restaurants, Inc. (8489), HDJG Corp. (3479), Red Steer, Inc. (2214), Houlihan’s of Ohio, Inc. (6410), HRI O’Fallon, Inc. (4539), Houlihan’s Texas Holdings, Inc. (5485). On November 17, 2021, the Court entered a final decree closing certain of the original affiliated Debtors’ Chapter 11 Cases [D.I. 883]. The Debtors’ mailing address is HRI Holdings Corp., c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, Delaware 19701.

² Capitalized terms used but not otherwise defined in this Declaration have the meanings given to them in the Objection.



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forth in this Declaration are based on my personal knowledge of the Debtors' business and financial affairs, information learned from my review of relevant documents, and information I have received from my own advisors, consultants, and personnel as well as Debtors' and Claim Agent's advisors, consultants, and personnel. If I were called upon to testify, I could and would competently testify to the facts set forth herein on that basis.

3. On November 5, 2020, the Court confirmed the Debtors' Plan pursuant to its *Findings of Fact, Conclusions of Law and Order (I) Confirming Joint Chapter 11 Plan of HRI Holding Corp. and its Debtor Affiliates and (II) Approving the Disclosure Statement on a Final Basis* [D.I. 735] (the "Confirmation Order").

4. On November 13, 2020 (the "Effective Date"), the plan of reorganization (the "Plan") was substantially consummated.

5. Pursuant to Article IV, Section F and Article VII, Section B of the Plan, the Plan Administrator was vested with standing and authority to object to claims.

6. The Disputed Claims listed on the Exhibit 1 to the proposed order are claims for an amount that has been satisfied. As a result, the satisfied claims should be modified as set forth in Exhibit 1 to the proposed Order.

7. In addition to the Disputed Claims listed on Exhibit 1 being satisfied, the Plan Administrator contends the Disputed Claim holders listed on Exhibit 2 to the proposed order should have their claim reclassified. With respect to the claim of All Systems Go (Claim No. 605), the claim is for pre-petition services that occurred on November 11, 2019 and is not a valid 503(b)(9) claim. With respect to Aramark Uniform & Career Apparel LLC (Claim No. 434) the claim is for rental items, which is not subject to a 503(b)(9) classification. With respect to claim No. 66 of Delta Charter Township, the secured amount should be reclassified and adjusted to match

the Debtors' books and records. With respect to the claim of Excel Linen Supply (Claim No. 487) this claim is for rental, freight and finance charges and not a valid 503(b)(9) claim.

8. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: August 19, 2022

/s/ Anthony M. Saccullo
Anthony M. Saccullo, Plan Administrator