

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

In re:	Chapter 11
Medley LLC, <sup>1</sup>	Case No. 21-10526 (KBO)
Debtor.	Re: Docket No. 700

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF MEDLEY LLC LIQUIDATING TRUST FOR ENTRY OF (I) A PROTECTIVE ORDER, AND (II) AN ORDER EXPRESSLY ALLOWING THE LIQUIDATING TRUST TO PRODUCE DOCUMENTS TO LOWENSTEIN SANDLER, LLP IN RESPONSE TO A SUBPOENA**

The undersigned hereby certifies that on March 27, 2024, the Medley LLC Liquidating Trust (the “Trust”), filed the *Motion of Medley LLC Liquidating Trust for Entry of (I) a Protective Order, and (II) an Order Expressly Allowing the Liquidating Trust to Produce Documents to Lowenstein Sandler, LLP in Response to a Subpoena* [Docket No. 700] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached to the Motion as Exhibit A was a proposed form of order approving the relief requested in the Motion (the “Proposed Order”). Any objection or response to the relief requested in the Motion was to be filed and served so as to be received by no later than April 3, 2024 at 4:00 p.m. (ET) (the “Objection Deadline”).

The undersigned further certifies that as of the Objection Deadline, no answer, objection, or other responsive pleading to the Motion was received by the Trust or has appeared on the Court’s docket in these cases.

WHEREFORE, the Trust respectfully requests that the Proposed Order, attached to the Motion, be entered at the earliest convenience of the Court.

<sup>1</sup> The Debtor’s current mailing address is c/o Medley LLC Liquidating Trust, c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, DE 19701.



Dated: April 4, 2024  
Wilmington, Delaware

Respectfully submitted,

/s/ Christopher M. Samis

Christopher M. Samis (No. 4909)

Sameen Rizvi (No. 6902)

**POTTER ANDERSON & CORROON LLP**

1313 N. Market Street, 6<sup>th</sup> Floor

Wilmington, Delaware 19801

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Email: csamis@potteranderson.com

srizvi@potteranderson.com

-and-

James S. Carr, Esq. (admitted *pro hac vice*)

Richard D. Gage, Esq. (admitted *pro hac vice*)

Sean T. Wilson, Esq. (admitted *pro hac vice*)

**KELLEY DRYE & WARREN LLP**

3 World Trade Center

175 Greenwich Street

New York, New York 10007

Telephone: (212) 808-7800

Facsimile: (212) 808-7897

Email: jcarr@kelleydrye.com

rgage@kelleydrye.com

swilson@kelleydrye.com

*Counsel for the Liquidating Trust*