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

	Re: Docket No. 712
Medley LLC, <sup>1</sup> Debtor.	Case No. 21-10526 (KBO)
In re:	Chapter 11

CERTIFICATE OF NO OBJECTION REGARDING MEDLEY LLC LIQUIDATING TRUST'S MOTION PURSUANT TO 11 U.S.C. § 105(a) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019 TO APPROVE SETTLEMENT WITH CERTAIN INSURANCE COMPANIES

The undersigned hereby certifies that on August 5, 2024, the Medley LLC Liquidating Trust (the "Liquidating Trust"), filed the *Medley LLC Liquidating Trust's Motion Pursuant to 11 U.S.C.* § 105(a) and Federal Rule of Bankruptcy Procedure 9019 to Approve Settlement with Certain Insurance Companies [Docket No. 712] (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 objections or responses to the relief requested in the Motion were to be filed and served so as to be received by no later than August 19, 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 Liquidating Trust or has appeared on the Court's docket in these cases.

<sup>&</sup>lt;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.



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

Dated: August 20, 2024 Wilmington, Delaware Respectfully submitted,

/s/ Sameen Rizvi

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*)

## 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

-and-

Eric D. Madden, Esq. (admitted *pro hac vice*) Brandon V. Lewis, Esq. (admitted *pro hac vice*)

## **REID COLLINS & TSAI LLP**

1601 Elm Street, Suite 4200

Dallas, Texas 75201

Telephone: (214) 420-8900 Facsimile: (214) 420-8909

Email: emadden@reidcollins.com blewis@reidcollins.com

Counsel for the Medley LLC Liquidating Trust