

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:)	Chapter 11
)	
OTB HOLDING LLC, <i>et al.</i> , ¹)	Case No. 25-52415 (SMS)
)	
)	
Debtors.)	(Joint Administration Requested)
)	

DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO (A) PREPARE A CONSOLIDATED LIST OF CREDITORS IN LIEU OF SUBMITTING A FORMATTED MAILING MATRIX, (B) FILE A CONSOLIDATED LIST OF THE DEBTORS' 30 LARGEST UNSECURED CREDITORS AND (C) REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION FOR INDIVIDUAL CREDITORS; (II) APPROVING THE FORM AND MANNER OF NOTIFYING CREDITORS OF THE COMMENCEMENT OF THESE CHAPTER 11 CASES AND OTHER INFORMATION; AND (III) GRANTING RELATED RELIEF

The above-captioned debtors and debtors in possession (collectively, the "Debtors") file this *Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Prepare a Consolidated List of Creditors In Lieu of Submitting a Formatted Mailing Matrix, (B) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors and (C) Redact Certain Personal Identification Information for Individual Creditors; (II) Approving the Form and Manner of Notifying the Creditors of the Commencement of These Chapter 11 Cases and Other*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: OTB Holding LLC (3213), OTB Acquisition LLC (8500), OTB Acquisition of New Jersey LLC (1506), OTB Acquisition of Howard County LLC (9865), Mt. Laurel Restaurant Operations LLC (5100), OTB Acquisition of Kansas LLC (9014), OTB Acquisition of Baltimore County, LLC (6963). OTB Holding LLC's service address is One Buckhead Plaza, 3060 Peachtree Road, NW, Atlanta, GA 30305.



Information; and (III) Granting Related Relief (the “Motion”). In support of this Motion, the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over these cases and this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409(a).

2. The bases for the relief requested herein are sections 105(a), 521, 1107 and 1108 of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 1007 and 2002 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rules 9006-2, 9013-1 and 9013-2 of the Local Rules of Practice for the United States Bankruptcy Court for the Northern District of Georgia (the “Local Rules”) and the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023 (the “Complex Case Procedures”).

BACKGROUND

3. On March 4, 2025 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”). The Debtors have continued in possession of their properties and have continued to operate and manage their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner, and no official committee has yet been established in these cases.

4. The factual background relating to the Debtors' commencement of these cases is set forth in detail in the *Declaration of Jonathan M. Tibus in Support of Chapter 11 Petitions and First Day Pleadings* (the "First Day Declaration") filed on or about the date hereof and incorporated herein by reference.²

RELIEF REQUESTED

5. By this Motion, the Debtors seek entry of an order substantially in the form attached hereto as **Exhibit A** (i) authorizing the Debtors (a) to prepare a consolidated list of creditors (the "Creditor Matrix") in lieu of submitting a separate mailing matrix for each Debtor, (b) to file a consolidated list of the Debtors' thirty (30) largest unsecured creditors, excluding insiders, and to redact certain personal identification information for individual creditors from the creditor matrix, (ii) approving the form and manner of notice of commencement of these chapter 11 cases and the scheduling of the meeting of creditors under section 341 of the Bankruptcy Code and (iii) granting related relief.

BASIS FOR RELIEF REQUESTED

A. The Court Should Authorize the Debtors to Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix.

6. Bankruptcy Code section 521(a) and Bankruptcy Rule 1007(a)(1) require a debtor in a voluntary chapter 11 case to file a list containing the name and complete address of each creditor. In addition, Bankruptcy Rule 1007(d) requires a debtor to file a list containing the name, address, and claim of the creditors holding the 20 largest unsecured claims against the debtor. *See* Fed. R. Bankr. P. 1007(d). Under the Complex Case Procedures, debtors seeking joint

² Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to such terms in the First Day Declaration.

administration are required to file, in the proposed lead case, a list of their thirty (30) largest unsecured creditors on a consolidated basis. *See* Complex Case Procedures (C)(2). Bankruptcy Rule 2002(a)(1) also provides that the clerk (or other person directed by the Court) must give the debtor, the Office of the United States Trustee, all creditors, and any indenture trustee at least twenty-one (21) days' notice by mail of the meeting of creditors under Bankruptcy Code section 341. *See* Fed. R. Bankr. P. 2002(a)(1). Bankruptcy Rule 2002(f)(1) also provides that notice of the order for relief shall be sent by mail to all creditors. *See* Fed. R. Bankr. P. 2002(f)(1).

7. The Debtors submit that permitting them to maintain a single consolidated list of creditors in lieu of filing a separate creditor matrix for each Debtor is warranted under the circumstances of these Chapter 11 Cases. Specifically, maintaining a single consolidated list of creditors will benefit the Debtors and their estates by allowing the Debtors to provide required notices more efficiently to parties-in-interest and reduce the potential for duplicate mailings. Indeed, many of the Debtors' creditors overlap and thus, to the extent that the Debtors are required to maintain separate mailing matrices, a substantial number of parties likely would receive multiple copies of the same notice.

8. In these cases, because the Debtors have thousands of creditors and other parties-in-interest, converting the Debtors' computerized information to a format compatible with the matrix requirements would be an unnecessarily burdensome and time-consuming task and would greatly increase the risk of error with respect to information already on computer systems maintained by the Debtors and their agents. Moreover, with respect to the top unsecured creditor lists, the Debtors submit that filing separate top twenty (20) unsecured creditor list for each Debtor—instead of one consolidated list of the Debtors' top thirty (30) unsecured creditors—

would be of limited utility and potentially duplicative to an extent, especially in comparison to the time and expense it would cost to compile separate lists when the Debtors' management are trying to facilitate a smooth transition into chapter 11.

9. The Debtors, working together with Verita Global (f/k/a Kurtzman Carson Consultants, LLC), the Debtors' proposed claims and noticing agent (the "Noticing Agent"), already have prepared a single, consolidated list of the Debtors' creditors in electronic format. The Debtors are prepared to make that list available in electronic form to any party in interest who so requests (or in non-electronic form at such requesting party's sole cost and expense) in lieu of submitting a separate mailing matrix for each Debtor to the Court's clerk's office. Accordingly, the Debtors respectfully request authority to prepare and maintain a consolidated list of their creditors in electronic format only.

10. Courts in this and other jurisdictions have granted similar relief. *See, e.g., In re LaVie Care Centers, LLC*, Case No. 24-55507 (PMB) (Bankr. N.D. Ga. June 27, 2024) [Docket No. 175]; *In re Jack Cooper Ventures Inc.*, Case No. 19-62393 (PWB) (Bankr. N.D. Ga. Aug. 9, 2019) [Docket No. 75] (authorizing the debtors to prepare a list of creditors in lieu of submitting a formatted mailing matrix); *In re Payless Holdings, LLC*, Case No. 19-40883 (KAS) (Bankr. E.D. Mo. Feb. 22, 2019) [Docket No. 193] (same); *In re Mission Coal*, Case No. 18-04177 (TOM) (Bankr. N.D. Ala. Oct. 16, 2018) [Docket No. 72] (same); *In re Cenveo, Inc.*, Case No. 18-22178 (RDD) (Bankr. S.D.N.Y. Feb. 6, 2018) [Docket No. 47] (same); *In re Oconee Regional Health Systems*, Case No. 17-51005 (AEC) (Bankr. M.D. Ga. May 17, 2017) [Docket No. 54] (same); *In*

re BCBG Max Azria Glob. Holdings, LLC, Case No. 17-10466 (SCC) (Bankr. S.D.N.Y. Mar. 3, 2017) (same); *In re Avaya Inc.*, No. 17-10089 (SMB) (Bankr. S.D.N.Y. Feb. 10, 2017) (same).³

B. Cause Exists to Authorize the Debtors to Suppress Certain Personal Identifiable Information for the Debtors’ Individual Creditors, Employees and Parties in Interest.

11. Additionally, section 107 of the Bankruptcy Code provides that this Court “for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft . . . [a]ny means of identification . . . contained in a paper filed, or to be filed in a case under” the Bankruptcy Code. 11 U.S.C. § 107(c)(1)(A). Cause exists to authorize the Debtors to redact address information of individual creditors—many of whom are employees—of the Debtors to the extent they appear on the Creditor Matrix because such information could be used to perpetrate identity theft. If requested, the Debtors will provide an unredacted version of the creditor matrix to the United States Trustee for the Northern District of Georgia, counsel to any official committee of unsecured creditors appointed in these chapter 11 cases, and the Court.

C. The Court Should Authorize the Debtors to File a Single Consolidated Top 30 List.

12. Pursuant to Bankruptcy Rule 1007(d), a debtor shall file “a list containing the name, address and claim of the creditors that hold the 20 largest unsecured claims, excluding insiders” Fed. R. Bank. P. 1007(d). If joint administration of a complex chapter 11 case is sought before this Court, the lead debtor must file one consolidated list of the debtors’ thirty (30) largest unsecured creditors, rather than file a separate list for each individual debtor. *See* Complex Case Procedures C(2).

³ Because of the voluminous nature of the orders cited herein, they are not attached to this Motion. Copies of these orders are available upon request to the Debtors’ proposed counsel.

13. The list of twenty (20) largest unsecured claims is used to facilitate the appointment of a creditors' committee by the U.S. Trustee. *See In Re Dandy Doughboy Donuts, Inc.*, 66 B.R. 457, 458 (Bankr. S.D. Fla. 1986) ("The purpose of the separate list of 20 largest creditors required by [Bankruptcy Rule 1007(d)] is to enable the clerk to identify members and the court to appoint immediately an unsecured creditors' committee in compliance with 11 U.S.C. § 1102(a)(1)."). If joint administration is sought in a chapter 11 case designated as a complex case, Procedure C(2) of the Complex Case Procedures permits multiple debtors to file one consolidated list of creditors, rather than file a separate list for each individual debtor.

14. The Debtors request authority to file a single consolidated list of their thirty (30) largest general unsecured creditors (the "Consolidated Top 30 List"). A large number of creditors may be shared amongst the Debtors. Furthermore, the Consolidated Top 30 List will help alleviate administrative burdens, costs, and the possibility of duplicative service. If a creditors' committee is ultimately deemed appropriate, the Consolidated Top 30 List will be sufficient to aid the U.S. Trustee's appointment of a creditors' committee. Although they reserve the right to do so in the future, for purposes of this Motion, the Debtors are not requesting authority to file consolidated schedules of assets and liabilities and statements of financial affairs or to substantively consolidate the Debtors.

15. Courts in this and other jurisdictions have approved relief similar to the relief requested in this Motion with respect to authorizing debtors to file a single consolidated lists of the debtors' largest unsecured creditors. *See, e.g., In re LaVie Care Centers, LLC*, Case No. 24-55507 (PMB) (Bankr. N.D. Ga. June 27, 2024) [Docket No. 175]; *In re the Krystal Company*, Case No. 20-61065 (WLH) (Bankr. N.D. Ga. Jan. 23, 2020) [Docket No. 47]; *In re Jack Cooper*

Ventures Inc., Case No. 19-62393 (PWB) (Bankr. N.D. Ga. Aug. 9, 2019) [Docket No. 75]; *In re Payless Holdings, LLC*, Case No. 19-40883 (KAS) (Bankr. E.D. Mo. Feb. 22, 2019) [Docket No. 193] (authorizing the debtors to file a single consolidated list of the 50 largest unsecured creditors of the debtors); *In re Mission Coal*, Case No. 18-04177 (TOM) (Bankr. N.D. Ala. Oct. 16, 2018) [Docket No. 72] (same); *In re 21st Century Oncology Holdings, Inc.*, Case No. 17-22770 (RDD) (Bankr. S.D.N.Y. May 26, 2017) [Docket No. 33] (same); *In re Ignite Restaurant Group, Inc.*, Case No. 17-33550 (DRJ) (Bankr. S.D. Tex. June 7, 2017) [Docket No. 67] (same).⁴

D. The Court Should Approve the Proposed Procedures for the Service of Notice of Commencement and the Meeting of Creditors.

16. Bankruptcy Rule 2002(a) provides, in relevant part, that “the clerk, or some other person as the court may direct, shall give the debtor, the trustee, all creditors and indenture trustees at least 21 days’ notice by mail of . . . the meeting of creditors under § 341 or § 1104(b) of the [Bankruptcy] Code.” Fed. R. Bank. P. 2002(a)(1). Bankruptcy Rule 2002 further provides that notice of the order for relief shall be sent by mail to all creditors and shareholders. Fed. R. Bank. P. 2002(d) and (f).

17. The Debtors propose that the Noticing Agent undertake all mailings directed by the Court, the U.S. Trustee, or as required by section 342(a) of the Bankruptcy Code and Bankruptcy Rule 2002(a) and (f), including the notice of commencement of these chapter 11 cases, substantially in the form attached hereto as **Exhibit 1** to **Exhibit A** (the “Notice of Commencement”), on all parties entitled to notice of commencement of the cases to advise them of the commencement of these chapter 11 cases and to provide important case information,

⁴ Because of the voluminous nature of the orders cited herein, they are not attached to this Motion. Copies of these orders are available upon request to the Debtors’ proposed counsel.

including notice of the Debtors' meeting of creditors under section 341 of the Bankruptcy Code (the "Meeting of Creditors").

18. The Noticing Agent's assistance with the mailing and preparation of creditor lists and notices will ease administrative burdens that otherwise would fall upon the Court and the U.S. Trustee.

19. Accordingly, the Debtors submit that the proposed maintenance of an electronic list of creditors by the Noticing Agent, the filing of the Consolidated Top 30 List, and the authority to mail the Notice of Commencement is appropriate under the facts and circumstances present here, and consistent with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules for the United States Bankruptcy Court for the Northern District of Georgia, and the Complex Case Procedures.

20. Further, courts in this and other districts have routinely granted relief similar to the relief requested herein. *See, e.g., In re LaVie Care Centers, LLC*, Case No. 24-55507 (Bankr. N.D. Ga. June 27, 2024) [Docket No. 175]; *In re Steward Health Care System LLC*, Case No. 24-90213 (CML) (Bankr. S.D. Tex. May 7, 2024) [Docket No. 90]; *In re Casa Systems, Inc.*, Case No. 24-10695 (KBO) (Bankr. D. Del. Apr. 25, 2024) [Docket No. 203]; *In re Sientra, Inc.*, Case No. 24-10245 (JTD) (Bankr. D. Del. Apr. 9, 2024) [Docket No. 275]; *In re ConvergeOne Holdings, Inc.*, Case No. 24-90194 (CML) (Bankr. S.D. Tex. Apr. 4, 2024) [Docket No. 74]; *In re SC Healthcare Holding, LLC*, Case No. 24-10443 (TMH) (Bankr. D. Del. Mar. 22, 2024) [Docket No. 80]; *In re The Krystal Company*, Case No. 20-61605 (PWB) (Bankr. N.D. Ga. Jan. 23, 2020) [Docket No.

47]; *In re Jack Cooper Ventures, Inc.*, Case No. 19-62393 (PWB) (Bankr. N.D. Ga. Aug. 9, 2019) [Docket No. 75].⁵

EMERGENCY CONSIDERATION

21. The Debtors respectfully request emergency consideration of this Motion pursuant to Bankruptcy Rule 6003, which empowers a court to grant relief within the first twenty-one (21) days after the commencement of a chapter 11 case “to the extent that relief is necessary to avoid immediate and irreparable harm.” Here, the Debtors believe an immediate and orderly transition into chapter 11 is critical to the viability of their operations and that any delay in granting the relief requested could hinder the Debtors’ operations and cause irreparable harm. Furthermore, the failure to receive the requested relief during the first twenty-one (21) days of these chapter 11 cases would severely disrupt the Debtors’ operations at this critical juncture. Accordingly, the Debtors submit that they have satisfied the “immediate and irreparable harm” standard of Bankruptcy Rule 6003 and, therefore, respectfully request that the Court approve the relief requested in this Motion on an emergency basis.

RESERVATION OF RIGHTS

22. Nothing contained herein is intended to be or shall be construed as (i) an admission as to the validity of any claim against the Debtors or any liens satisfied pursuant to this Motion; (ii) an agreement or obligation to pay any claims; (iii) a waiver of any claims or causes of action that may exist against any creditor or interest holder; (iv) a waiver of the Debtors’ or any appropriate party in interest’s right to dispute any claim; or (v) an approval, assumption, or

⁵ Because of the voluminous nature of the orders cited herein, they are not attached to this Motion. Copies of these orders are available upon request to the Debtors’ proposed counsel.

rejection of any agreement, contract, program, policy, or lease under section 365 of the Bankruptcy Code. Likewise, if the Court grants the relief sought herein, any payment made pursuant to the Court's order is not intended to be and should not be construed as an admission to the validity of any claim or a waiver of the Debtors' right to dispute such claim subsequently.

NOTICE

23. Notice of this Motion has been provided to: (a) the Office of the United States Trustee for the Northern District of Georgia; (b) the Debtors' thirty (30) largest unsecured creditors; (c) counsel to the Debtors' prepetition lenders; (d) counsel to the Debtors' debtor-in-possession lender; (e) the Internal Revenue Service; (f) the Georgia Department of Revenue; (g) the Attorney General for the State of Georgia; (h) the United States Attorney for the Northern District of Georgia; (i) the state attorneys general for states in which the Debtors conduct business; and (j) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtors respectfully submit that no further notice is necessary.

NO PRIOR REQUEST

24. No prior request for the relief sought in the motion has been made to this or any other court.

CONCLUSION

WHEREFORE, the Debtors request this Court enter an order, substantially in the form of **Exhibit A**, granting the relief requested herein and such other and further relief as the Court may deem just and proper.

[Remainder of Page Intentionally Blank]

Date: March 5, 2025
Atlanta, Georgia

Respectfully submitted,

KING & SPALDING LLP

/s/ Jeffery R. Dutson

Jeffrey R. Dutson

Georgia Bar No. 637106

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*Proposed Counsel for the Debtors in
Possession*

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:)	Chapter 11
)	
OTB HOLDING LLC, <i>et al.</i> , ¹)	Case No. 25-52415 (SMS)
)	
)	
Debtors.)	(Jointly Administered)
)	

**ORDER (I) AUTHORIZING THE DEBTORS TO (A) PREPARE
A CONSOLIDATED LIST OF CREDITORS IN LIEU OF SUBMITTING A
FORMATTED MAILING MATRIX, (B) FILE A CONSOLIDATED
LIST OF THE DEBTORS' 30 LARGEST UNSECURED CREDITORS, AND
(C) REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION
FOR INDIVIDUAL CREDITORS; (II) APPROVING THE FORM AND MANNER OF
NOTIFYING CREDITORS OF THE COMMENCEMENT OF THESE CHAPTER 11
CASES AND OTHER INFORMATION; AND (III) GRANTING RELATED RELIEF**

This matter is before the Court on the *Emergency Motion for Entry of an Order (I)*
Authorizing the Debtors to (A) Prepare a Consolidated List of Creditors In Lieu of Submitting a

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: OTB Holding LLC (3213), OTB Acquisition LLC (8500), OTB Acquisition of New Jersey LLC (1506), OTB Acquisition of Howard County LLC (9865), Mt. Laurel Restaurant Operations LLC (5100), OTB Acquisition of Kansas LLC (9014), OTB Acquisition of Baltimore County, LLC (6963). OTB Holding LLC's service address is One Buckhead Plaza, 3060 Peachtree Road, NW, Atlanta, GA 30305.

Formatted Mailing Matrix, (B) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors and (C) Redact Certain Personal Identification Information for Individual Creditors; (II) Approving the Form and Manner of Notifying the Creditors of the Commencement of These Chapter 11 Cases and Other Information; and (III) Related Relief (the "Motion") [Docket No. __] of the above-captioned debtors and debtors in possession (collectively, the "Debtors"). All capitalized terms used but not defined herein shall have the meanings given them in the Motion.

The Court has considered the Motion, the First Day Declaration, and the matters reflected in the record of the hearing held on the Motion on _____, 2025. It appears that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. § 1408; and it appearing that the relief requested is in the best interests of the Debtors' estates, their creditors, and other parties in interest, and that good cause has been shown therefor; IT IS HEREBY ORDERED:

1. The Motion is granted to the extent set forth herein.
2. The requirement that each Debtor submit a separate mailing matrix and a separate list of its twenty (20) largest general unsecured creditors is waived.
3. In lieu of submitting a formatted mailing matrix, the Debtors shall make available a single, consolidated list of all of the Debtors' creditors in electronic form to any entity who so requests and in non-electronic form at such requesting entity's sole cost and expense.
4. The Debtors are authorized to redact address information of individual creditors listed on the Creditor Matrix; provided, however, the Debtors shall provide, upon request, an

unredacted version of the Creditor Matrix to the U.S. Trustee for the Northern District of Georgia, any official committee of unsecured creditors appointed in these chapter 11 cases, and this Court.

5. The Debtors are authorized to file a Consolidated Top 30 List.

6. The Debtors are authorized to serve the Notice of Commencement, substantially in the form attached hereto as **Exhibit 1**, to all parties in interest in accordance with Bankruptcy Rule 2002. Service of the Notice of Commencement shall be deemed adequate and sufficient notice of the commencement of these chapter 11 cases.

7. The Debtors, with the assistance of the proposed Noticing Agent (upon the Court's approval of the Debtors' retention of the Noticing Agent), are authorized, but not directed, to undertake all mailings directed by the Court, the U.S. Trustee as required by the Bankruptcy Code, the Bankruptcy Rules, and the Complex Case Procedures, as applicable, including the Notice of Commencement of these Chapter 11 Cases, and any other correspondence that the Debtors may wish to send creditors.

8. Nothing in the Motion, this Order or the relief granted (including any actions taken or payments made by the Debtors pursuant thereto) shall be construed as (a) authority to assume or reject any executory contract or unexpired lease of real property, or as a request for the same; (b) an admission as to the validity, priority, or character of any claim or other asserted right or obligation, or a waiver or other limitation on the Debtors' ability to contest the same on any ground permitted by bankruptcy or applicable nonbankruptcy law; (c) a promise or requirement to pay any claim or other obligation; or (d) granting third-party beneficiary status, bestowing any additional rights on any third party, or being otherwise enforceable by any third party.

9. Notwithstanding Bankruptcy Rule 6004(h), this Order shall be effective immediately upon its entry.

10. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a), the Bankruptcy Local Rules for the Northern District of Georgia and the Complex Case Procedures are satisfied by such notice.

11. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

12. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

13. Proposed counsel for the Debtors, through Kurtzman Carson Consultants, LLC d/b/a Verita Global (“Verita”) shall, within three (3) days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first class mail, as applicable, on all parties served with the Motion, and Verita shall file promptly thereafter a certificate of service confirming such service.

[END OF ORDER]

Prepared and presented by:

/s/ Jeffrey R. Dutson

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Proposed Counsel for the Debtors in Possession

Exhibit 1

Proposed Notice of Commencement

Information to identify the case:

Debtor OTB Holding LLC, et al. EIN 27-2153213
 Name
 United States Bankruptcy Court for the Northern District of Georgia Date case filed for chapter 11: **March 4, 2025**
 Case number: Lead Case 25-52415 (SMS), Jointly Administered

Official Form 309F (For Corporations or Partnerships)

Notice of Chapter 11 Bankruptcy Case

12/17

For the debtors listed above, cases has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered for each Debtor. This notice has important information about the cases for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read all pages carefully.

The filing of the cases imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtors or the debtors' property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtors. Creditors cannot demand repayment from the debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected on the website created by the Claims and Noticing Agent Kurtzman Carson Consultants, LLC dba Verita Global ("Verita") for these chapter 11 cases at <https://www.veritaglobal.net/ontheborder> or at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at www.pacer.gov).

Inquiries regarding this notice may be directed to Verita by calling (800) 647-1744 (toll free for U.S. and Canadian-based parties) or +1 (310) 751-2628 (for international parties) or using the "Submit an Inquiry" link on the Verita website: <https://www.veritaglobal.net/ontheborder/inquiry>

Debtors' counsel, representatives of Verita, and the staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

1. Lead Debtor Name	All Other Names Used in Last 8 Years	Case Number	Tax I.D. Numbers
OTB Holding LLC	N/A	25-52415	27-2153213
2. Other Debtor Names & Case Numbers	A full listing of the Debtors' names, tax I.D. numbers, and corresponding case numbers is available on the Debtors' restructuring website: https://www.veritaglobal.net/ontheborder		
3. Address	One Buckhead Plaza 3060 Peachtree Road, NW, Atlanta, GA 30305		
4. Debtors' attorney KING & SPALDING LLP Jeffrey R. Dutson Brooke L. Bean Alice Kyung Won Song 1180 Peachtree Street NE, Suite 1600 Atlanta, Georgia 30309 Telephone: (404) 572-4600 email: jdutson@kslaw.com email: bbean@kslaw.com email: asong@kslaw.com	<u>Debtors' Claims and Noticing Agent (for court documents and case information inquiries):</u> KURTZMAN CARSON CONSULTANTS, LLC dba VERITA GLOBAL ("VERITA") <u>Website:</u> https://www.veritaglobal.net/ontheborder <u>Submit an Inquiry:</u> https://www.veritaglobal.net/ontheborder/inquiry <u>Telephone:</u> (888) 647-1744 (toll free for U.S. and Canadian-based parties) +1 (310) 751-2628 (for international parties)		

Debtor: OTB HOLDING LLC, et al.

Case Number (if known): 25-52415

5. Bankruptcy clerk's office	<p>Hours open: Monday – Friday 8:00 AM – 4:00 PM Contact phone: (404)–215–1000</p> <p>Documents in this case may be filed at this address.</p> <p>Clerk of the United States Bankruptcy Court 75 Ted Turner Drive, SW Atlanta, Georgia 30303</p> <p>You may inspect all records filed in this case at this office or online at www.pacer.gov or at the Debtors' restructuring website at https://www.veritaglobal.net/ontheborder</p>
6. Meeting of creditors The Debtors' representative must attend the meeting to be questioned under oath. Creditors may attend but are not required to do so. The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.	<p>Date: [], 2025 at []:00 [].m. (ET)</p> <p>The meeting will be held telephonically – please dial []. The access code is [].</p>
7. Proof of claim deadline	<p>Deadline for filing proof of claim: Not yet set. If deadline is set, the court will send you another notice.</p> <p>A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be filed either electronically or as a paper document. A proof of claim form may be obtained at www.uscourts.gov, any bankruptcy clerk's office, or on the case website at https://www.veritaglobal.net/ontheborder.</p> <p>Your claim will be allowed in the amount scheduled unless:</p> <ul style="list-style-type: none"> ▪ your claim is designated as <i>disputed</i>, <i>contingent</i>, or <i>unliquidated</i>; ▪ you file a proof of claim in a different amount; or ▪ you receive another notice. <p>If your claim is not scheduled or if your claim is designated as <i>disputed</i>, <i>contingent</i>, or <i>unliquidated</i>, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.</p> <p>You may review the schedules at the Bankruptcy Clerk's office or online at www.pacer.gov or at the Debtors' restructuring website at https://www.veritaglobal.net/ontheborder.</p> <p>Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.</p>
8. Exception to discharge Deadline The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.	<p>If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint by the deadline imposed by Federal Rule of Bankruptcy Procedure 4007(c).</p>
9. Creditors with a foreign address	<p>If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.</p>

Debtor: OTB HOLDING LLC, et al.

Case Number (if known): 25-52415

10. Filing a Chapter 11 bankruptcy case	Bankruptcy cases under Chapter 11 of the Bankruptcy Code has been filed in this court by the Debtors listed herein, and orders for relief have been entered. Chapter 11 allows the debtor to reorganize or liquidate according to a plan. A plan is not effective unless confirmed by the court. You may receive a copy of a plan and a disclosure statement telling you about a plan, and you might have the opportunity to vote on a plan. You will receive notice of the date of a confirmation hearing, and you may object to confirmation of a plan and attend a confirmation hearing. Unless a trustee is serving, the Debtors will remain in possession of the Debtors' property and may continue to operate any business.
11. Discharge of debts	Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. <i>See</i> Bankruptcy Code § 1141(d). A discharge means that you may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the Bankruptcy Clerk's Office by the deadline.

If you have any questions related to this notice, please call (888) 647-1744 (toll free for U.S. and Canadian-based parties) or +1 (310) 751-2628 (for international parties) or using the "Submit an Inquiry" link on the Verita website: <https://www.veritaglobal.net/ontheborder/inquiry>. You may access documents and case information at <https://www.veritaglobal.net/ontheborder>.