

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

OTB HOLDING LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-52415 (SMS)
)
) (Joint Administration Requested)
)

**REQUEST FOR EXPEDITED CONSIDERATION
OF CERTAIN FIRST DAY MATTERS**

On March 4, 2025, the Debtors filed petitions for relief under Chapter 11 of the Bankruptcy Code. The Debtors assert that these cases qualify as “Complex Chapter 11 Cases” and that they need expedited consideration of the following initial case matters (check those that apply):

- X** *Debtors’ Emergency Motion for Entry of an Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief [Docket No. 3]*
- X** *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 [Docket No. 4]*

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.



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- X** *Debtors' Emergency Motion for Entry of an Order (I) Extending Time to File Schedules and Statements of Financial Affairs and (II) Granting Related Relief [Docket No. 5]*
- X** *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Continued Use of Prepetition Bank Accounts, Cash Management System, Forms, and Books and Records and (II) Granting Related Relief [Docket No. 6]*
- X** *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Payment of Prepetition Wages, Payroll Taxes, Certain Employee Benefits, and Related Expenses; (II) Directing Banks to Honor Related Prepetition Transfers; and (III) Granting Related Relief [Docket No. 7]*
- X** *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Continue Prepetition Insurance and Workers' Compensation Policies and to Pay Prepetition Premiums and Related Obligations and (II) Granting Related Relief [Docket No. 8]*
- X** *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Related Obligations and (II) Granting Related Relief [Docket No. 9]*
- X** *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service on Account of Prepetition Invoices; (II) Deeming Utilities Adequately Assured of Future Performance; (III) Establishing Procedures for Determining Adequate Assurance of Payment; and (IV) Granting Related Relief [Docket No. 10]*
- X** *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Honor Prepetition Obligations to Customers and Otherwise Continue Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief [Docket No. 11]*
- X** *Emergency Application of Debtors for Entry of Order Authorizing the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global as Claims, Noticing, Solicitation and Administrative Agent Effective As Of Petition Date [Docket No. 12]*

- X** *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing (A) the Debtors to Pay Certain Prepetition Claims of Trade Claimants and (B) Procedures Related Thereto, and (II) Granting Related Relief [Docket No. 13]*
- X** *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims Arising Under the Perishable Agricultural Commodities Act and (II) Granting Related Relief [Docket No. 14]*
- X** *Debtors' Emergency Motion for Entry an Order (I) Authorizing Payment of Prepetition Claims of Section 503(b)(9) Vendors and (II) Granting Related Relief [Docket No. 15]*
- X** *Debtor's First Omnibus Emergency Motion for Entry of an Order (I) Authorizing (A) Rejection of Certain Unexpired Leases of Non-Residential Real Property Effective As Of the Petition Date, (B) Abandonment of Any Remaining Personal Property Located at the Leased Premises; (II) Fixing a Bar Date for Claims of Counterparties; and (III) Granting Related Relief [Docket No. 16]*
- X** *Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection; (III) Authorizing Use of Cash Collateral; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Docket No. 17]*

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Date: March 5, 2025
Atlanta, Georgia

Respectfully submitted,

KING & SPALDING LLP

/s/ Jeffrey R. Dutson

Jeffrey R. Dutson

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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:

OTB HOLDING LLC, *et al.*,¹

Debtors.

)
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) Case No. 25-52415 (SMS)
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**ORDER GRANTING COMPLEX CHAPTER 11 BANKRUPTCY CASE TREATMENT
AND SCHEDULING FIRST DAY MATTERS**

On March 4, 2025, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, a Notice of Designation of Complex Chapter 11 Cases, and a Request for Expedited Consideration of Certain First Day Matters. After review of the initial pleadings filed in these cases, the Court

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concludes that these cases appear to be Complex Chapter 11 Cases. Accordingly, unless the court orders otherwise, **IT IS ORDERED THAT:**

I. These Cases shall proceed in accordance with the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023;

II. The Request for Expedited Consideration of Certain First Day Matters is GRANTED. A hearing will be held before the Court on the _____ **day of March, 2025** at _____ **a/p.m. in Courtroom __**, U.S. Courthouse, 75 Ted Turner Drive, SW Atlanta, Georgia 30303 to consider the following First Day Matters:

 X *Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief [Docket No. 3]*

 X *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 [Docket No. 4]*

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(II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection; (III) Authorizing Use of Cash Collateral; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Docket No. 17]

III. Copies of the First Day Matters shall be made available as follows: (a) upon written request to the Debtor's proposed counsel of record; (b) at the website of the Debtor's proposed claims and noticing agent, www.veritaglobal.net/ontheborder; (c) by using the “submit an Inquiry” option on the Debtors; proposed claims and noticing agent website at www.veritaglobal.net/ontheborder/inquiry; and/or (d) in the Office of the Clerk, U.S. Bankruptcy Court between 8:00 a.m. and 4:00 p.m. or online anytime at <http://ecf.ganb.uscourts.gov> (registered users) or at <http://pacer.psc.uscourts.gov> (unregistered users). No further notice shall be required.

IV. Attached hereto are this Court’s telephonic and video appearance procedures. Parties may attend the hearing telephonically via the following dial-in and corresponding Meeting ID, or may attend through video conference via the following Virtual Data Room link: <https://www.zoomgov.com/j/1611794270?pwd=N0FtZ0JSU2lsMHJqakdEY0x4Szc5UT09#success>

[END OF ORDER]

Prepared and presented by:

/s/ Jeffrey R. Dutson

Jeffrey R. Dutson

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Proposed Counsel for the Debtors in Possession

Telephonic Appearances by Counsel for Judge Sigler's Hearings

- Toll Free Number: 833-568-8864
- Enter Meeting ID 161 179 4270 followed by # key
- Dial in at least 10 minutes before the hearing time.
- Place all phones on mute. Under no circumstances should you place this call on hold.
- Pursuant to BLR 5073-1, you are prohibited from recording or broadcasting the proceedings conducted by the United States Bankruptcy Court.
- Each time you speak, identify yourself for the record.

Virtual Hearing Room Instructions

The link to connect to Judge Sigler's Virtual Hearing Room is available on Judge Sigler's webpage at <https://www.ganb.uscourts.gov/content/honorable-sage-m-sigler>. The link to the Virtual Hearing Room is located under the section entitled Staff Information below the Chambers' email address and above the tab entitled Hearing Information. You should connect via this link each time you have a hearing with Judge Sigler until further notice from the Court.

The link is best used on a desktop or laptop computer but may also be used on a phone or tablet. Your device must have a camera and audio. Headsets are strongly encouraged to prevent feedback. You will have the greatest success by being connected to reliable Wi-Fi with a connection speed greater than 3mb/s. The first time you click the link you may be instructed to download the zoom application. It will only take a couple of minutes. When you are connected via your device, you will be in Judge Sigler's Virtual Hearing Room.

PLEASE JOIN THE VIRTUAL ROOM SUFFICIENTLY PRIOR TO YOUR HEARING IN CASE YOU HAVE A PROBLEM ACCESSING THE VIRTUAL HEARING ROOM. IF YOU EXPERIENCE DIFFICULTY IN CONNECTION, PLEASE CONTACT THE COURTROOM DEPUTY VIA EMAIL.

When you join the Virtual Hearing Room, please place yourself on mute until your matter is called. Remember you are on video, even as you wait your turn. You may also turn your video off until your matter is called; however, while any matter in which you are appearing is being heard, you must leave your camera on. **The judge will be in the courtroom and since this is a court proceeding, the judge expects all participants to dress and act as if they are in the courtroom.**

As with the telephonic appearances, identify yourself for the record each time you speak. Also make sure your Zoom profile matches your legal name. **You are prohibited from recording or broadcasting the proceedings conducted by the bankruptcy court. BLR 5073-1.**

If you have any questions, please contact Nicholas Mahone at 404-215-1029 or Nicholas_Mahone@ganb.uscourts.gov; you may also contact chambers at 404-215-1202 or SMSChambers@ganb.uscourts.gov.