

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE	:	CHAPTER 11
	:	
OTB HOLDING LLC	:	CASE NO. 25-52415-SMS
OTB Acquisition LLC,	:	
	:	
Debtor.	:	
	:	
ZIG IRVING, LLC,	:	
	:	
Movant,	:	
	:	
v.	:	CONTESTED MATTER
	:	
OTB HOLDING LLC and	:	
OTB Acquisition LLC, Debtors.	:	
	:	
Respondents.	:	
	:	
	:	

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that **ZIG Irving, LLC** has filed a Motion for Relief from Automatic Stay and related papers with the Court seeking an order of relief from the Automatic Stay.

**PLEASE TAKE FURTHER NOTICE** that the Court will hold a hearing on the Motion for Relief from Automatic Stay, at **10:00 a.m. on April 2, 2025 in Courtroom 1201, The Richard B. Russell Federal Building, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303** which may be attended in person or via the Court's Virtual Hearing Room. You may join the Virtual Hearing Room through the "Dial-in and Virtual Bankruptcy Hearing Information" link at the top of the homepage of the court's website, [www.ganb.uscourts.gov](http://www.ganb.uscourts.gov), or the link on the judge's webpage, which can also be found on the Court's website. Please also review the "Hearing information" tab on the judge's webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the



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judge's webpage.

Your rights may be affected by the Court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the Court to grant the relief sought in these pleadings, or if you want the Court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleadings with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk before the hearing. The address of the Clerk's Office is Clerk, U.S. Bankruptcy Court, Room 1340, U.S. Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

If a hearing on the Motion cannot be held within thirty (30) days, Movant waives the requirement for holding a preliminary hearing within thirty days of filing the motion and agrees to a hearing on the earliest possible date. Movant consents to the automatic stay remaining in effect until the Court orders otherwise.

Dated: March 14, 2025

Signature: /s/Philip L. Rubin

Philip L. Rubin  
5555 Glenridge Connector  
Suite 900  
Atlanta, Georgia 30342  
(404) 869-6900  
prubin@lrqlaw.com  
Bar Number 618525

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FOR THE NORTHERN DISTRICT OF GEORGIA  
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OTB Acquisition LLC, Debtors.	:	
	:	
Respondents.	:	
	:	
	:	

**MOTION FOR RELIEF FROM AUTOMATIC STAY**

NOW COMES ZIG IRVING, LLC (the "Movant") and moves this Court for relief from the automatic stay and shows the Court as follows:

1.

On March 4, 2025, OTB Holding LLC and OTB Acquisition LLC ("Debtors") filed a Voluntary Petition pursuant to 11 U.S.C. Chapter 11, and said case is pending before this Court.

2.

Movant is the holder of a claim in this case arising from a Lease Agreement for commercial real property between Debtor On the Border and Movant: 1220 Market Pl Blvd, Irving, TX 75063 (the "Real Property"). Debtor is in default on the Lease Agreement in the approximate amount of \$25,351.74 for the January 1, 2025 lease payment and all subsequent

payments, each in the amount of \$8,540.58. Lease payments are set to increase to \$9,394.58 beginning April 1, 2025. Movant has not received any lease payments since December 2024.

3.

Debtor does not have equity in the Lease Agreement or the leased property and neither is necessary to a reorganization that is in prospect.

4.

Cause exists including the lack of adequate protection to grant Movant relief from the automatic stay so as to authorize Movant to exercise its rights in and to its property under the Lease Agreement and state law.

5.

Movant requests that Rule 4001(a)(3) be waived.

WHEREFORE, Movant prays that this Court:

(a) Hold a Hearing pursuant to this Motion within thirty (30) days as is required under 11 U.S.C. Section 362(e);

(b) Enter an Order terminating the estate's interest in the Lease Agreement as herein defined and providing further that the automatic stay, to the extent it restrains Movant from enforcing its rights in and to the Real Property, be vacated;

c) Rule 4001(a)(3) be waived; and

d) Grant such other and further relief as the Court deems to be just and proper.

This March 14, 2025.

The Law Office of  
LEFKOFF, RUBIN, GLEASON, RUSSO & SMITH, P.C.  
Attorneys for Movant

By: /s/ Philip L. Rubin  
Philip L. Rubin  
Georgia State Bar No. 618525

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Suite 900  
Atlanta, Georgia 30342  
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Debtor.	:	
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_____ ZIG IRVING, LLC,	:	_____
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Movant,	:	
	:	
v.	:	CONTESTED MATTER
	:	
OTB HOLDING LLC and	:	
OTB Acquisition LLC, Debtors.	:	
	:	
Respondents.	:	
	:	
	:	

**CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2025, I electronically filed the foregoing MOTION FOR RELIEF FROM AUTOMATIC STAY and NOTICE OF HEARING using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

Brooke Bean  
King & Spalding LLP  
Suite 1600  
1180 Peachtree St. NE  
Atlanta, GA 30309

Alan Hinderleider  
Office of the United States Trustee  
362 Richard Russell Building  
75 Ted Turner Drive, SW  
Atlanta, GA 30303

I further certify that on this day I caused a copy of this document to be served via United States First Class Mail, with adequate postage prepaid on the following parties at the address shown for each:

OTB Holding LLC  
3060 Peachtree Road, NW  
Atlanta, GA 30305

OTB Acquisition LLC  
2201 W. Royal Lane  
Irving, TX 75063

\*and the attached Creditor Matrix

Dated: March 14, 2025.

The Law Office of  
LEFKOFF, RUBIN, GLEASON, RUSSO & SMITH, P.C.  
Attorneys for Movant

By: /s/ Philip L. Rubin  
Philip L. Rubin  
Georgia State Bar No. 618525

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Atlanta, Georgia 30342  
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Label Matrix for local noticing  
113E-1  
Case 25-52415-sms  
Northern District of Georgia  
Atlanta  
Fri Mar 14 12:59:05 EDT 2025

Jessica Gabel Cino  
Krevolin & Horst, LLC  
Ste 3250 - One Atlantic Center  
1201 West Peachtree Street NW  
Atlanta, GA 30309-3460

Eric M. English  
Porter Hedges LLP  
1000 Main Street, 36th Floor  
Houston, TX 77002-6341

Internal Revenue Service  
P. O. Box 7346  
Philadelphia, PA 19101-7346

Jeffrey Kurtzman  
Kurtzman Steady, LLC  
101 N Washington Avenue  
Suite 4a  
Margate, NJ 08402-1195

Mt. Laurel Restaurant Operations LLC  
2201 W. Royal Lane  
Irving, TX 75063-3303

OTB Acquisition LLC  
2201 W. Royal Lane  
Irving, TX 75063-3200

OTB Acquisition of Kansas LLC  
2201 W. Royal Lane  
Irving, TX 75063-3303

PR Woodland Limited Partnership  
c/o Jeffrey Kurtzman, Esquire  
101 N Washington Avenue, Ste 4A  
Margate, NJ 08402-1195

Kristen N. Pate  
Brookfield Properties  
Suite 300  
350 N. Orleans St.  
Chicago, IL 60654-1607

Bartel Trust Agreement  
229 BARANNAN  
#15A  
SAN FRANCISCO, CA 94107-4059

(p)CROSSFIRST BANK  
11440 TOMAHAWK CREEK PARKWAY  
LEAWOOD KS 66211-2672

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699 Piedmont Ave NE  
Atlanta, GA 30308-1414

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Houston, TX 77002-6341

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222 N. Pacific Coast Highway  
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El Segundo, CA 90245-5614

Nueces County  
c/o Diane W. Sanders  
Linebarger Goggan Blair & Sampson, LLP  
P.O. Box 17428  
Austin, TX 78760-7428

OTB Acquisition of Baltimore County, LLC  
2201 W. Royal Lane  
Irving, TX 75063-3303

OTB Acquisition of New Jersey LLC  
2201 W. Royal Lane  
Irving, TX 75063-3303

PREIT Services, LLC  
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Atlanta, GA 30303-3315

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Atlanta, GA 30308-3225

McLennan County  
c/o Diane W. Sanders  
Linebarger Goggan Blair & Sampson, LLP  
P.O. Box 17428  
Austin, TX 78760-7428

ODP Business Solutions, LLC  
6600 N Military Trl  
Boca Raton, FL 33496-2434

OTB Acquisition of Howard County LLC  
2201 W. Royal Lane  
Irving, TX 75063-3303

OTB Holding LLC  
3060 Peachtree Road, NW  
Atlanta, GA 30305-2234

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McCreary Veselka Bragg & Allen PC  
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Round Rock, TX 78680-1269

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3500 Maple Avenue  
Dallas, TX 75219-3906

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Office of Reorganization  
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950 East Paces Ferry Road, NE  
Atlanta, GA 30326-1382

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75 Ted Turner Drive, SW  
Atlanta, GA 30303-3315

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Office of the U.S. Trustee  
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75 Ted Turner Drive, SW  
Atlanta, GA 30303-3330

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

CrossFirst Bank  
11440 Tomahawk Creek Parkway  
Leawood, KS 66211

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Allen ISD	(u)Alvarez & Marsal North America, LLC	(u)Bowie Central Appraisal District
(u)Brookfield Properties Retail Inc.	(du)Brookfield Properties Retail, Inc.	(u)City of Allen



(u)City of Richardson

(u)City of Roanoke

(u)City of Waco and/or Waco ISD

(u)Dallas County

(u)Gregg County

(u)Hilco Corporate Finance, LLC

(u)Kite Realty Group

(u)Lewisville ISD

(u)McLennan County

(u)Midland Central Appraisal District

(u)Northwest ISD

(u)Nueces County

(u)OTB Lender, LLC

(u)Realty Income Corporation

(u)Simon Property Group, Inc.

(u)Site Centers Corp

(u)Smith County

(u)Tarrant County

(u)The County of Brazos, Texas

(u)The County of Denton, Texas

(u)Jonathan Tibus

(u)Wallen Ventures, LLC

End of Label Matrix	
Mailable recipients	42
Bypassed recipients	28
Total	70