

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

IN THE MATTER OF:	)	BK NO. 25-52415 (SMS)
	)	Chapter 11
OTB HOLDING, LLC <i>et al.</i> ,	)	
	)	
Debtors.	)	

OBJECTION TO DEBTORS' JOINT CHAPTER 11 PLAN

COMES NOW the secured creditor, Oma Mex, LLC (hereinafter "OM") and files its Objection to the Debtors' (hereinafter "Debtors") proposed Chapter 11 Plan of Reorganization ("Objection").

Factual Background

1. This Objection relates to the Chapter 11 Plan of Reorganization of Debtors filed July 1, 2025 ("Plan").
2. OM operated a franchise location of an On the Border restaurant located in Papillion, Nebraska.
3. As part of the franchise agreement, OM incurred costs associated with catering and gift certificate sales.
4. OM filed a Proof of Claim confirming its secured interest in assets of the Debtors on May 14, 2025.

Objection to the Plan

5. The Plan provides no information regarding who the Class 1 secured creditors are.
6. The Plan provides no information regarding how much is to be paid to the Class 1 secured creditors.



7. The Plan lacks sufficient information for secured creditors to properly confirm adequate payment of their secured claims.

8. Debtors have requested approval to file omnibus objections to claims; however, no such objection(s) have been filed.

Prayer for Relief

WHEREFORE, OM prays that its Objection above be sustained, that confirmation of the Debtors' Plan be denied, and for such other and further relief as the Court deems just and proper.

Dated July 9, 2025.

OMA MEX, LLC, Secured Creditor,

By: /s/ Frederick D. Stehlik
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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2025, I caused the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Georgia as shown on the attached creditor mailing matrix.

/s/ Frederick D. Stehlik

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