

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

In re:

OTB HOLDING LLC, *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)  
) Case No. 25-52415 (SMS)  
)  
)  
) (Jointly Administered)  
)  
)  
) Related Docket Nos. 493, 494, and 495

**NOTICE OF FILING OF  
THE LETTER OF COMMITTEE IN SUPPORT OF THE PLAN**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. On July 1, 2025, the above captioned debtors and debtors in possession (collectively the “Debtors”) filed the *Debtors’ Joint Chapter 11 Plan as of July 1, 2025* [Docket No. 493] (the “Plan”) and the *Disclosure Statement with Respect to the Joint Chapter 11 Plan Dated as of July 1, 2025* [Docket No. 494] (the “Disclosure Statement”) with the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”).

2. On July 1, 2025, the Debtors filed the *Debtors’ Motion for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Setting a Combined Hearing on Final Approval of the Disclosure Statement and Plan Confirmation; (III) Approving Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Debtors’ Chapter 11 Plan; and (IV) Approving Related Notice and Objection Procedures* [Docket No. 495] (the “Motion”) with the Court.<sup>2</sup>

3. The proposed form of the Approval Order is attached to the Motion as Exhibit 1 thereto.

<sup>1</sup> 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.

<sup>2</sup> Capitalized terms used but not otherwise described herein shall have the meaning ascribed thereto in the Motion.



4. The Approval Order includes the letter from the Committee urging Holders to vote in favor of the Plan as Exhibit 4 thereto (the “Letter of Committee in Support of the Plan”). The Letter of Committee in Support of the Plan was not attached to the initial form of the Approval Order attached to the Motion.

5. Accordingly, the form of the Letter of Committee in Support of the Plan is attached hereto as **Exhibit A**.

6. A copy of each document filed in the above captioned chapter 11 cases can be viewed on the Court’s website at [www.ganb.uscourts.gov](http://www.ganb.uscourts.gov) and the website of the Debtors’ claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ontheborder>. Further information may be obtained by using the “Submit an Inquiry” function at <https://www.veritaglobal.net/ontheborder/inquiry>.

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Date: July 17, 2025  
Atlanta, GA

Respectfully submitted,

KING & SPALDING LLP

/s/ Jeffrey R. Dutson

Jeffrey R. Dutson

Georgia Bar No. 637106

Brooke L. Bean

Georgia Bar No. 764552

Alice Kyung Won Song

Georgia Bar No. 692753

**KING & SPALDING LLP**

1180 Peachtree Street NE

Atlanta, Georgia 30309

Telephone: (404) 572-4600

Email: jdutson@kslaw.com

Email: bbean@kslaw.com

Email: asong@kslaw.com

*Counsel for the Debtors in Possession*

**Exhibit A**

**Letter of Committee in Support of the Plan**

**The Official Committee of Unsecured  
Creditors of OTB Holding LLC, et al.**

**Eversheds Sutherland (US) LLP**  
999 Peachtree St. NE, Suite 2300  
Atlanta, GA 30309

July [●], 2025

**To the Unsecured Creditors of OTB Holding LLC, et al.:**

The Official Committee of Unsecured Creditors (the “Committee”) of OTB Holding LLC and its related debtor affiliates (collectively, the “Debtors”) submits this letter to the Debtors’ unsecured creditors in connection with the solicitation of your vote on the *Debtors’ Joint Chapter 11 Plan as of July 1, 2025*, filed on July 1, 2025 [Docket No. 493] (the “Plan”). The Plan, among other things,: (i) provides for the liquidation of substantially all of the Debtors’ assets; (ii) provides for a liquidation trustee, selected by the Committee, to monetize assets and distribute remaining cash to claimants under the Plan; (iii) preserves all claims and Causes of Action of the Debtors and the Estates that are not expressly sold or released, including potential claims against certain of the Debtors’ insiders, for the benefit of unsecured creditors; and (iv) represents the best alternative for unsecured creditors in completing these chapter 11 cases.

**FOR THE REASONS SET FORTH HEREIN, THE COMMITTEE RECOMMENDS YOU VOTE TO ACCEPT THE PLAN. IF APPROVED, THE PLAN GRANTS RELEASES OF CLAIMS THAT THE DEBTOR MAY HAVE AGAINST CERTAIN THIRD-PARTIES. THE PLAN DOES NOT GRANT RELEASES OF CLAIMS YOU MAY HAVE AGAINST THIRD-PARTIES.**

**NOTWITHSTANDING THE RECOMMENDATION SET FORTH HEREIN, EACH CREDITOR MUST MAKE ITS OWN INDEPENDENT DETERMINATION AS TO WHETHER THE PLAN IS ACCEPTABLE TO THAT CREDITOR AND SHOULD CONSULT ITS OWN LEGAL AND/OR FINANCIAL ADVISOR(S). THE BRIEF SUMMARY THAT FOLLOWS IS DESIGNED TO HIGHLIGHT CERTAIN PLAN PROVISIONS AND IS QUALIFIED IN ITS ENTIRETY BY THE PLAN AND DISCLOSURE STATEMENT (AS DEFINED BELOW).**

On July 1, 2025, the Debtors filed the Plan and the *Disclosure Statement with Respect to the Joint Chapter 11 Plan dated as of July 1, 2025* [Docket No. 494] (the “Disclosure Statement”). The Disclosure Statement describes and explains the Plan and the distributions and releases provided thereunder.

On [July 22], 2025, the United States Bankruptcy Court for the Northern District of Georgia entered an order, among other things, approving on a conditional basis the adequacy of the Disclosure Statement and establishing procedures for the solicitation and tabulation of votes on the Plan.

As set forth in greater detail in the Plan and the Disclosure Statement, the Plan provides, among other things, that each Holder of an Allowed Class 4 General Unsecured Claim (as defined in the Plan) shall receive an interest in the Liquidating Trust Assets, excluding the Retained Property and the Initial Distribution Amount (each as defined in the Plan), held by a liquidating trust and administered on a pro rata basis to, and for the benefit of, Holders of Allowed Class 4 General Unsecured Claims.

In summary, the Plan effectuates the liquidation of the Debtors on terms that, based upon the information provided to the Committee, the Committee believes are more favorable to unsecured creditors than in a chapter 7 liquidation. **Accordingly, the Committee supports the Plan.**

For purposes of voting on the Plan, the Debtors provided you with a ballot which should be completed by you for either accepting or rejecting the Plan. The ballot should be returned in accordance with the procedures set forth on the ballot and in the Disclosure Statement and the *Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Setting a Combined Hearing on Final Approval of the Disclosure Statement and Plan Confirmation; (III) Approving Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Debtors' Chapter 11 Plan; and (IV) Approving Related Notice and Objection Procedures* [Docket No. [●]].

This letter provides only a brief description of the provisions of the Plan that impact unsecured creditors. As such, all unsecured creditors are urged to carefully review the Plan and Disclosure Statement and consult with their legal and financial advisors accordingly. This communication does not constitute, and shall not be construed as, a recommendation or solicitation by any individual member of the Committee.

If you have any questions regarding the foregoing, please contact counsel to the Committee, Nathaniel DeLoatch at (404)853-8356.

THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF OTB  
HOLDING LLC, ET AL.