

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)  
)  
)  
) Hearing Date: September 9, 2025, 1:30 p.m. (ET)  
) Obj. Deadline: September 4, 2025, 4:00 p.m. (ET)

**NOTICE OF HEARING ON AND DEADLINE TO OBJECT TO  
DEBTORS' SECOND OMNIBUS OBJECTION TO SECURED AND PRIORITY  
CLAIMS LISTED ON EXHIBIT A-1, EXHIBIT A-2 AND EXHIBIT A-3**

PLEASE TAKE NOTICE that the above captioned debtors and debtors in possession (collectively the “Debtors”) filed the *Debtors’ Second Omnibus Objection to Secured and Priority Claims Listed on Exhibit A-1, Exhibit A-2 and Exhibit A-3* (the “Objection”) on August 5, 2025.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Objection at 1:30 p.m. (prevailing Eastern Time) on September 9, 2025, in Courtroom 1201, United States Courthouse, 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 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

<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.



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 reply, 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 by 4:00 p.m. (prevailing Eastern Time) on September 4, 2025.** The address of the Clerk's Office is: Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta Georgia 30303. You must also serve a copy of your response on the Debtors' counsel, King & Spalding LLP, 1180 Peachtree Street, NE, Atlanta, Georgia 30309, Attention: Jeffrey R. Dutson, Esq. (email: [jdutson@kslaw.com](mailto:jdutson@kslaw.com)) and Brooke L. Bean, Esq. (email: [bbean@kslaw.com](mailto:bbean@kslaw.com)) and any other appropriate persons.

Date: August 5, 2025  
Atlanta, GA

Respectfully submitted,

KING & SPALDING LLP

/s/ Jeffrey R. Dutson

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*Counsel for the Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

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

**DEBTORS' SECOND OMNIBUS OBJECTION TO SECURED AND PRIORITY  
CLAIMS LISTED ON EXHIBIT A-1, EXHIBIT A-2 AND EXHIBIT A-3**

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND PLEASE REVIEW EXHIBIT A-1, EXHIBIT A-2 AND EXHIBIT A-3 ATTACHED HERETO TO LOCATE YOUR NAME AND CLAIM(S).**

**THIS IS AN OBJECTION TO YOUR CLAIM. SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION THAT MAY BE FILED. PLEASE BE AWARE THAT THE DEBTORS ARE ASKING THE COURT TO DISALLOW CERTAIN OF THE CLAIMS THAT YOU FILED IN THESE CHAPTER 11 CASES.**

**TO THE EXTENT YOU DISAGREE WITH THE RELIEF SOUGHT IN THE OBJECTION, YOU SHOULD IMMEDIATELY CONTACT THE DEBTORS TO RESOLVE THE DISPUTE. IF YOU DO NOT REACH AN AGREEMENT, YOU MUST FILE A RESPONSE TO THIS OBJECTION AND SEND A COPY OF YOUR RESPONSE TO THE DEBTORS AND THEIR COUNSEL BY SEPTEMBER 4, 2025 AT 4:00 P.M. (PREVAILING EASTERN TIME). YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT FILE A RESPONSE BY SEPTEMBER 4, 2025 AT 4:00 P.M. (PREVAILING EASTERN TIME), YOUR CLAIM MAY BE DISALLOWED, EXPUNGED, OR ELIMINATED WITHOUT FURTHER NOTICE OR HEARING.**

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<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.

**THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS' OR ANY PARTY IN INTEREST'S RIGHTS TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED ON EXHIBIT A-1, EXHIBIT A-2 AND EXHIBIT A-3 TO THIS OBJECTION.**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby submit this omnibus objection (this “Objection”) to those certain secured and priority claims set forth on Exhibit A-1, Exhibit A-2 and Exhibit A-3 attached hereto (collectively, the “Claims”) and respectfully represent as follows:

### **RELIEF REQUESTED**

1. By this Objection, the Debtors request entry of an order, substantially in the form attached hereto as Exhibit B (the “Proposed Order”), disallowing (a)(i) the claims set forth on Exhibit A-1 pursuant to Rule 3007(d)(2)(A) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) because each of them are duplicative of subsequent Proofs of Claim filed by the applicable claimant (collectively, the “Duplicative Claims”), (ii) the claims set forth on Exhibit A-2 pursuant to Bankruptcy Rules 3007(d)(2)(E) because each of them assert claims that were satisfied in whole or in part during these Chapter 11 Cases (as defined in the First Day Declaration (as defined herein)) (collectively, the “Satisfied Claims”), and (iii) the claims set forth on Exhibit A-3 pursuant to the Additional Omnibus Grounds (as defined by reference herein) because each of them either fails to sufficiently specify the basis for the claim or does not include sufficient documentation to ascertain the validity of the claim (collectively, the “Unsupported Claims”); and (b) granting any other and further relief that this Court deems just and proper.

### **JURISDICTION AND VENUE**

2. The United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “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). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409(a).

3. The predicates for the relief requested herein are sections 105 and 502 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Bankruptcy Rule 3007(d)(2), Rule 3007-1 of the Local Rules of 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**

4. On March 4, 2025 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in 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 in these cases.

5. On March 7, 2025, the Court entered the *Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 45] authorizing the joint administration and procedural consolidation of the chapter 11 cases pursuant to Bankruptcy Rule 1015(b).

6. On March 17, 2025, the U.S. Trustee appointed the official committee of unsecured creditors (the “Committee”). See *Appointment and Notice of Appointment of Committee of Creditors Holding Unsecured Claims* [Docket No. 111].

7. 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* [Docket No. 18] (the "First Day Declaration") filed on or about the Petition Date.

8. On April 2, 2025, the Debtors filed their *Motion Seeking Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claim; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages Bar Date; (IV) Approving the Form of and Manner for Filing Proofs of Claim; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief* [Docket No. 187] (the "Bar Date Motion").

9. On April 16, 2025, after a hearing, the Court entered the *Order (I) Setting a Bar Date for Filing Proofs of Claim; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages Bar Date; (IV) Approving the Form of and Manner for Filing Proofs of Claim; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief* [Docket No. 259] (the "Bar Date Order") that, among other things, (a) established May 29, 2025 at 5:00 p.m. (prevailing Eastern Time) as the last day for creditors that are not governmental units to file proof of claims, proof of interest, and requests for payment of administrative expense claims under Bankruptcy Code section 503(b)(9); (b) established October 21, 2025 at 5:00 p.m. (prevailing Eastern Time) as the last day for creditors that are governmental units to file proofs of claim, proofs of interest, and requests for payment of administrative expense claims under Bankruptcy Code section 503(b)(9); and (c) approved a form of bar date notice, proof of claim form, and other related procedures.

10. On June 24, 2025, the Debtors filed *the Debtors' Motion for Entry of an Order Pursuant to 11 U.S.C. § 105(a) and Rule 3007 of the Federal Rules of Bankruptcy Procedure Authorizing the Filing of Omnibus Claims Objections on Certain Additional Grounds* [Docket No. 475] (the "Omnibus Claims Objection Procedures Motion").<sup>2</sup>

11. On July 16, 2025, the Court entered the *Order Pursuant to 11 U.S.C. § 105(a) and Rule 3007 of the Federal Rules of Bankruptcy Procedure Authorizing the Filing of Omnibus Claims Objections on Certain Additional Grounds* [Docket No. 514] (the "Omnibus Claims Objection Procedures Order"), authorizing the Debtors to file omnibus objections that include objections to claims provided for in Bankruptcy Rule 3007(d), Local Rule 3007-1, and/or Additional Omnibus Grounds, which include, but is not limited to a proof of claim failing to sufficiently specify the basis for a claim or failing to include sufficient documentation to ascertain the validity of a claim.

12. In the ordinary course of business, including subsequent to the Petition Date, the Debtors maintained books and records (the "Books and Records") that reflect, among other things, the Debtors' liabilities and the amounts owed to their creditors.

#### **BASIS FOR RELIEF REQUESTED AND APPLICABLE AUTHORITY**

13. Bankruptcy Code section 502 provides, in pertinent part, that "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a

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<sup>2</sup> All capitalized terms used but not defined herein shall have the meanings ascribed to them in the Omnibus Claims Objection Procedures Motion.

party in interest . . . objects.” 11 U.S.C. § 502(a). The debtor has a duty to object to the allowance of any claim that is improper. *See* 11 U.S.C. § 1107(a).

14. When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *See id.*; *see also* Bankruptcy Rule 3001(f) (a properly executed and filed proof of claim “constitute[s] *prima facie* evidence of the validity and amount of the claim”).

15. A party wishing to dispute a claim’s validity must produce evidence sufficient to negate the claim’s *prima facie* validity. *See In re Allegheny Int’l, Inc.*, 954 F.2d at 173-74. Once an objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id.* at 174; *see also Dollinger v. BV Retail, LLC (In re S&Q Shack, LLC)*, 2015 Bankr. LEXIS 1166, at \*6-7 (N.D. Ga. Feb. 13, 2015); *Chambliss v. Oakwood Acceptance Corp. (In re Chambliss)*, 315 B.R. 166, 169 (Bankr. S.D. Ga. 2004). Ultimately, the burden of persuasion is on the claimant. *See In re Moss*, No. 94-11959, 1995 WL 17005342, at \*1 (Bankr. S.D. Ga. Sept. 28, 1995).

16. Bankruptcy Rule 3007(d)(2) provides that objections to more than one claim may be joined in a single objection if the objections are based solely on the grounds that the claims should be disallowed, in whole or in part, because they (a) duplicate other claims; (b) were filed in the wrong case; (c) have been amended by later proofs of claim; (d) were not timely filed; (e) have been satisfied or released during the case; (f) were presented in a form that does not comply with applicable rules and the objector is therefore unable to determine a claim’s validity;



(g) are interests, not claims; or (h) assert a priority in an amount that exceeds the maximum amount allowable under Bankruptcy Code 507. *See* Fed. R. Bankr. P. 3007(d)(2).

17. Pursuant to the Omnibus Claims Objection Procedures Order, the Debtors are authorized to file omnibus objections to claims on the Additional Omnibus Grounds, seeking the reduction, reclassification, and/or disallowance of claims on one or more of the following grounds:

- a. the amount of the claim is inconsistent with the Debtors' books and records;
- b. the claim was incorrectly classified, including, but not limited to, as (i) a claim entitled to improper priority treatment under the Bankruptcy Code or (ii) a claim with an asserted but unperfected or invalid security interest against the Debtors;
- c. the proof of claim seeks recovery of amounts for which the Debtors are not liable;
- d. the claim asserts administrative priority under Bankruptcy Code section 503(b)(9) but fails to assert a claim for goods delivered to the Debtors within twenty (20) days of the Petition Date;
- e. the claim has been formally withdrawn by the claimant through the filing of a pleading or through the entry of a Court order indicating withdrawal of the claim;
- f. the proof of claim is filed against non-Debtors, the incorrect Debtor, or is filed against multiple Debtors;
- g. the proof of claim fails to specify a Debtor against whom the claim is asserted;
- h. the claim is disallowed or subordinated pursuant to Bankruptcy Code sections 502 or 510;
- i. the claim is satisfied by payment in full or in part on account of such claim from a party that is not a Debtor, including one or more of the Debtors' insurers;
- j. the proof of claim fails to specify the asserted amount of the claim (other than "unliquidated"); and
- k. the proof of claim fails to sufficiently specify the basis for the claim or does not include sufficient documentation to ascertain the validity of the claim.

18. The Debtors object to (i) the Duplicative Claims identified on **Exhibit A-1** hereto pursuant to Bankruptcy Rule 3007(d)(2)(A) because each such Claim has been superseded and/or

amended by proofs of claim subsequently filed by the respective claimant, (ii) the Satisfied Claims identified on **Exhibit A-2** hereto pursuant to Bankruptcy Rule 3007(d)(2)(E) because each such Claim asserts claims that were satisfied in whole or in part during these Chapter 11 Cases, and (iii) the Unsupported Claims identified on **Exhibit A-3** hereto pursuant to the Additional Omnibus Grounds because each such Claim fails to sufficiently specify the basis for the claim or does not include sufficient documentation to ascertain the validity of the claim. Failure to disallow and expunge the Claims may result in the respective claimants receiving an unwarranted and duplicative recovery against the Debtors on a priority or secured basis to the detriment of other parties-in-interest. Accordingly, the Debtors request that the Court enter an order disallowing and expunging the Claims. For the avoidance of doubt, the Debtors do not, at this time, seek to object, disqualify, disallow or expunge any general unsecured portion of the Claims listed. However, the Debtors reserve the right to further object to the Claims during these Chapter 11 Cases.

### **RESERVATION OF RIGHTS**

19. The Debtors reserve the right to supplement this Objection and to object to the Claims as well as any other claims filed by the respective claimants in the Chapter 11 Cases, on any and all other substantive, non-substantive, legal, or factual grounds. Without limiting the generality of the foregoing, the Debtors specifically reserve the right to amend this Objection, file additional papers in support of this Objection, file a subsequent objection on any ground to the Claims to the extent they are not disallowed in their entirety as requested herein or take other appropriate actions to (a) respond to any allegation or defense that may be raised in a response filed by or on behalf of any claimant or other interested parties, (b) further object to any general unsecured claim portion of the Claims, (c) further object to any other claim for which any claimant

provides (or attempts to provide) additional documentation or substantiation, or (d) further object to the Claims based on additional information that may be discovered upon further review by the Debtors or through discovery pursuant to the applicable provisions of Part VII of the Bankruptcy Rules. In addition, the Debtors reserve the right to object to all other claims filed in the Chapter 11 Cases.

### **NOTICE**

20. The Debtors will provide notice of this Objection to each claimant set forth on **Exhibit A-1**, **Exhibit A-2**, and **Exhibit A-3**, their counsel where applicable, and all parties on the Limited Service List. The Debtors respectfully submit that such notice is sufficient and proper under the circumstances and that no other or further notice is required.

### **NO PRIOR REQUEST**

21. No previous request for the relief sought herein has been made to this or any other court.

### **COMPLIANCE WITH LOCAL RULE 3007-1**

22. To the best of the Debtors' knowledge and belief, the Objection, including its exhibits, substantially complies with Local Rule 3007-1. To the extent that the Objection does not comply with the requirements of Local Rule 3007-1, the Debtors submit that the deviations are not material and respectfully request that those requirements be waived.

### **CONCLUSION**

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit B**, (a) disallowing and expunging the Claims in their entirety and (b) granting such other relief as the Court deems just, equitable, and proper.

Date: August 5, 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

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*Counsel for the Debtors in Possession*

**Exhibit A-1<sup>1</sup>**

**Duplicative Claims**

<b>Duplicative Claims</b>							
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Original Secured Claim Amount	Reason for Disallowance
1	ARAPAHOE COUNTY <sup>2</sup>	OTB Acquisition LLC	25-52416	3		\$12,766.31	Claim is duplicative of Claim No. 76.
2	COLD TEX REFRIGERATION, LLC	OTB Acquisition LLC	25-52416	331		\$1,697.90	Claim is duplicative of Claim No. 479.
3	Robert Tsai Photography	OTB Holding LLC	25-52415	115	\$4,286.70		Claim is duplicative of Claim No. 336.
4	ServicExperts, Inc.	OTB Acquisition of Kansas LLC	25-52420	109		\$33,810.43	Claim is duplicative of Claim No. 506.
5	Robert Tsai Photography	OTB Holding LLC	25-52415	115	\$4,286.70		Claim is duplicative of Claim No. 336.
6	T Twin Creeks TX, LLC	OTB Acquisition LLC	25-52416	182		\$106,636.04	Claim is duplicative of Claim No. 621
7	T Twin Creeks TX, LLC	OTB Acquisition LLC	25-52416	621		\$106,636.04	Claim is duplicative of Claim No. 622

<sup>1</sup> For the avoidance of doubt, the Debtors do not, at this time, seek to object, disqualify, disallow or expunge any general unsecured portion of the Duplicative Claims listed on this Exhibit A-1. However, the Debtors reserve the right to further object to the Duplicative Claims during these Chapter 11 Cases.

<sup>2</sup> Proof of Claim No. 3 was filed by “ARAPAHOE COUNTY” and Proof of Claim No. 76 was filed by “ARAPAHOE COUNTY TREASURER.” However, the Debtors believe these claims reflect duplicative claims filed by Arapahoe County.

**Exhibit A-2<sup>1</sup>**

**Satisfied Claims**

<b>Satisfied Claims</b>							
<b>#</b>	<b>Name of Claimant</b>	<b>Debtor</b>	<b>Case Number</b>	<b>Claim Number</b>	<b>Original Priority Claim Amount</b>	<b>Original Secured Claim Amount</b>	<b>Reason for Disallowance</b>
1	1970 Group, Inc.	OTB Acquisition LLC	25-52416	548		\$55,750.00	The Claimant provided notice on July 8, 2025 that it was sweeping the cash that secures this secured Claim. Accordingly, this secured Claim has been satisfied.
2	1970 Group, Inc.	OTB Acquisition of New Jersey LLC	25-52417	549		\$55,750.00	The Claimant provided notice on July 8, 2025 that it was sweeping the cash that secures this secured Claim. Accordingly, this secured Claim has been satisfied.
3	1970 Group, Inc.	OTB Acquisition of Howard County LLC	25-52418	550		\$55,750.00	The Claimant provided notice on July 8, 2025 that it was sweeping the cash that secures this secured Claim. Accordingly, this secured Claim has been satisfied.
4	1970 Group, Inc.	Mt. Laurel Restaurant Operations LLC	25-52419	551		\$55,750.00	The Claimant provided notice on July 8, 2025 that it was sweeping the cash that secures this secured Claim. Accordingly, this secured Claim has been satisfied.
5	1970 Group, Inc.	OTB Holding LLC	25-52415	552		\$55,750.00	The Claimant provided notice on July 8, 2025 that it was sweeping the cash that secures this secured Claim. Accordingly, this secured Claim has been satisfied.
6	1970 Group, Inc.	OTB Acquisition of Baltimore	25-52421	553		\$55,750.00	The Claimant provided notice on July 8, 2025 that it was sweeping the cash that secures this secured Claim. Accordingly, this secured Claim has been satisfied.

<sup>1</sup> For the avoidance of doubt, the Debtors do not, at this time, seek to object, disqualify, disallow or expunge any general unsecured portion of the Satisfied Claims listed on this Exhibit A-2. However, the Debtors reserve the right to further object to the Satisfied Claims during these Chapter 11 Cases.

Satisfied Claims							
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Original Secured Claim Amount	Reason for Disallowance
		County, LLC					
7	1970 Group, Inc.	OTB Acquisition of Kansas LLC	25-52420	574		\$55,750.00	The Claimant provided notice on July 8, 2025 that it was sweeping the cash that secures this secured Claim. Accordingly, this secured Claim has been satisfied.
8	Airport Associates LP	OTB Acquisition LLC	25-52416	259	\$14,331.12		The lease between Claimant and Debtor OTB Acquisition LLC was assumed and assigned to OTB Hospitality, LLC (the “Buyer”) in connection with such party’s purchase of substantially all of the assets of the Debtors (the “Sale”). Accordingly, the Claim was satisfied by the payment of the cure amount in connection with such assumption and assignment.
9	CrossFirst Bank	OTB Acquisition LLC	25-52416	493		\$11,868,613.60	This Claim was satisfied by the payment made by the Debtors to Claimant upon closing of the Sale pursuant to paragraph 15 of the <i>Order (A) Approving the Sale of Substantially All of the Debtors’ Assets Free and Clear of Liens and Liabilities, (B) Authorizing the Debtors to Assume and Assign Executory Contracts and Unexpired Leases in Connection with the Sale, and (C) Granting Related Relief</i> [Docket No. 403].
10	PR Woodland Limited Partnership	OTB Acquisition LLC	25-52416	15	\$21,417.01		The lease between Claimant and Debtor OTB Acquisition LLC was assumed and assigned to the Buyer in connection with closing of the Sale. Accordingly, the Claim was satisfied by the payment of the cure amount in connection with such assumption and assignment.

**Exhibit A-3<sup>1</sup>**

**Unsupported Claims**

<b>Unsupported Claims</b>							
<b>#</b>	<b>Name of Claimant</b>	<b>Debtor</b>	<b>Case Number</b>	<b>Claim Number</b>	<b>Original Priority Claim Amount</b>	<b>Original Secured Claim Amount</b>	<b>Reason for Disallowance</b>
1	Ecolab Inc.	OTB Acquisition LLC	25-52416	505		\$28,274.00	Claimant failed to include sufficient documentation in the Claim to ascertain the validity of the Claim.
2	Franchise Tax Board	OTB Holding LLC	25-52415	186	\$800.00		Claimant failed to include sufficient documentation to support the validity of the Claim. The Claim is for California state franchise taxes and relates to Debtor OTB Holding LLC – an entity that is organized in Delaware and does not have operations in California.
3	Texas Comptroller of Public Accounts	OTB Acquisition LLC	25-52416	673	\$331,295.53		Claimant failed to include sufficient documentation in the Claim to ascertain the basis for the Claim.
4	Texas Comptroller of Public Accounts	OTB Acquisition LLC	25-52416	674	\$407,939.30		Claimant failed to include sufficient documentation in the Claim to ascertain the basis for the Claim.
5	Texas Comptroller of Public Accounts	OTB Acquisition LLC	25-52416	676	\$176,881.03		Claimant failed to include sufficient documentation in the Claim to ascertain the basis for the Claim.
6	Texas Comptroller of Public Accounts on Behalf of the State of Texas and Local Sales Tax Jurisdictions	OTB Acquisition LLC	25-52416	675	\$209,701.15		Claimant failed to include sufficient documentation in the Claim to ascertain the basis for the Claim.

<sup>1</sup> For the avoidance of doubt, the Debtors do not, at this time, seek to object, disqualify, disallow or expunge any general unsecured portion of the Satisfied Claims listed on this Exhibit A-3. However, the Debtors reserve the right to further object to the Unsupported Claims during these Chapter 11 Cases.



Unsupported Claims							
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Original Secured Claim Amount	Reason for Disallowance
7	The Travelers Indemnity Company and Those Certain of its Property Casualty Insurance Affiliates	OTB Acquisition LLC	25-52416	481		\$74,500.00	Claimant failed to include sufficient documentation in the Claim to ascertain the basis for the Claim.
8	The Travelers Indemnity Company and Those Certain of its Property Casualty Insurance Affiliates	OTB Holding LLC	25-52415	478		\$74,500.00	Claimant failed to include sufficient documentation in the Claim to ascertain the basis for the Claim.

**Exhibit B**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

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

ORDER SUSTAINING  
DEBTORS' SECOND OMNIBUS OBJECTION TO SECURED AND PRIORITY  
CLAIMS LISTED ON EXHIBIT A-1, EXHIBIT A-2 AND EXHIBIT A-3

This matter is before the Court on the Debtors' *Second Omnibus Objection to Secured and Priority Claims Listed on Exhibit A-1, Exhibit A-2 and Exhibit A-3* [Docket No. [●]] (the "Objection") of the above captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order disallowing and expunging the secured and priority claims filed by certain

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<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.

claimants (each, a “Claimant,” and collectively, the “Claimants”) (i) identified on **Schedule 1** (collectively, the “Duplicative Claims”), (ii) identified on **Schedule 2** (collectively, the “Satisfied Claims”), and (iii) identified on **Schedule 3** (collectively, the “Unsupported Claims” and together with the Duplicative Claims and Satisfied Claims, the “Claims”) attached hereto, all as more fully set forth in the Objection. All capitalized terms used but not defined herein shall have the meanings given to them in the Objection.

The Court having jurisdiction over the Objection pursuant to 28 U.S.C. §§ 1334 and 157(b), the Objection being a core matter pursuant to 28 U.S.C. § 157(b)(2), the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of the Debtors’ estates, their creditors, residents and other parties in interest; and the Court being able to enter a final order consistent with Article III of the United States Constitution; and the Debtors having filed a notice setting the Objection and any responses thereto for hearing on [●], 2025 (the “Hearing”); and the Court having found that notice of the Objection and opportunity for hearing on the Objection were appropriate under the circumstances and no other notice need be provided; and the Court having found that all requisite parties-in-interest had an opportunity to file a response to the Objection and attend the Hearing to support any asserted response to the Objection; and no response to the Objection was filed and no creditor or party in interest appeared to oppose the relief requested in the Objection; and the Court having reviewed and considered the Objection and all other matters of record in these chapter 11 cases, including the lack of objection thereto; and it appearing that the relief requested in the Objection is in the best interests of the Debtors, their estates, and their creditors, and that the legal and factual bases set forth in the

Objection and at the Hearing establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Objection is SUSTAINED and GRANTED as set forth herein.
2. The Claims are disallowed and expunged in their entirety. For the avoidance of doubt, this Order shall not disallow or expunge any general unsecured portion of (i) the Duplicative Claims listed on **Schedule 1**, (ii) the Satisfied Claims listed on **Schedule 2**, and (iii) the Unsupported Claims listed on **Schedule 3**. All rights of the Debtors to further object to the Claims during these Chapter 11 Cases are reserved.
3. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.
4. This Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or relating to the implementation of this Order.

[END OF ORDER]

Prepared and presented by:

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**Schedule 1**

**Duplicative Claims**

#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Original Secured Claim Amount
1	ARAPAHOE COUNTY	OTB Acquisition LLC	25-52416	3		\$12,766.31
2	COLD TEX REFRIGERATION, LLC	OTB Acquisition LLC	25-52416	331		\$1,697.90
3	Robert Tsai Photography	OTB Holding LLC	25-52415	115	\$4,286.70	
4	ServicExperts, Inc.	OTB Acquisition of Kansas LLC	25-52420	109		\$33,810.43
5	Robert Tsai Photography	OTB Holding LLC	25-52415	115	\$4,286.70	
6	T Twin Creeks TX, LLC	OTB Acquisition LLC	25-52416	182		\$106,636.04
7	T Twin Creeks TX, LLC	OTB Acquisition LLC	25-52416	621		\$106,636.04

**Schedule 2**

**Satisfied Claims**

#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Original Secured Claim Amount
1	1970 Group, Inc.	OTB Acquisition LLC	25-52416	548		\$55,750.00
2	1970 Group, Inc.	OTB Acquisition of New Jersey LLC	25-52417	549		\$55,750.00
3	1970 Group, Inc.	OTB Acquisition of Howard County LLC	25-52418	550		\$55,750.00
4	1970 Group, Inc.	Mt. Laurel Restaurant Operations LLC	25-52419	551		\$55,750.00
5	1970 Group, Inc.	OTB Holding LLC	25-52415	552		\$55,750.00
6	1970 Group, Inc.	OTB Acquisition of Baltimore County, LLC	25-52421	553		\$55,750.00
7	1970 Group, Inc.	OTB Acquisition of Kansas LLC	25-52420	574		\$55,750.00
8	Airport Associates LP	OTB Acquisition LLC	25-52416	259	\$14,331.12	
9	CrossFirst Bank	OTB Acquisition LLC	25-52416	493		\$11,868,613.60
10	PR Woodland Limited Partnership	OTB Acquisition LLC	25-52416	15	\$21,417.01	



**Schedule 3**

**Unsupported Claims**

#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Original Secured Claim Amount
1	Ecolab Inc.	OTB Acquisition LLC	25-52416	505		\$28,274.00
2	Franchise Tax Board	OTB Holding LLC	25-52415	186	\$800.00	
3	Texas Comptroller of Public Accounts	OTB Acquisition LLC	25-52416	673	\$331,295.53	
4	Texas Comptroller of Public Accounts	OTB Acquisition LLC	25-52416	674	\$407,939.30	
5	Texas Comptroller of Public Accounts	OTB Acquisition LLC	25-52416	676	\$176,881.03	
6	Texas Comptroller of Public Accounts on Behalf of the State of Texas and Local Sales Tax Jurisdictions	OTB Acquisition LLC	25-52416	675	\$209,701.15	
7	The Travelers Indemnity Company and Those Certain of its Property Casualty Insurance Affiliates	OTB Acquisition LLC	25-52416	481		\$74,500.00
8	The Travelers Indemnity Company and Those Certain of its Property Casualty Insurance Affiliates	OTB Holding LLC	25-52415	478		\$74,500.00