

**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'  
THIRD OMNIBUS OBJECTION TO SECURED CLAIMS LISTED ON EXHIBIT A**

**PLEASE TAKE NOTICE** that the above captioned debtors and debtors in possession (collectively the “Debtors”) filed the *Debtors’ Third Omnibus Objection to Secured Claims Listed on Exhibit A* (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 to grant the relief sought in these pleadings or if you want the Court to consider your views, then

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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.



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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  
Jeffrey R. Dutson  
Georgia Bar No. 637106  
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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' THIRD OMNIBUS OBJECTION TO  
SECURED CLAIMS LISTED ON EXHIBIT A**

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND PLEASE REVIEW EXHIBIT A 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, ELIMINATED, REDUCED, OR RECLASSIFIED 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 TO THIS OBJECTION.**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby submit the *Debtors’ Third Omnibus Objection to Secured Claims Listed on Exhibit A* (this “Objection”) to those certain secured and claims filed by certain claimants (each, a “Claimant,” and collectively, the “Claimants”) set forth on Exhibit A attached hereto (each a “Claim,” and collectively, the “Claims”) and respectfully represent as follows:

### **RELIEF REQUESTED**

1. By this Objection, the Debtors request (a) entry of an order, substantially in the form attached hereto as Exhibit B (the “Proposed Order”), reclassifying the claims set forth on Exhibit A pursuant to section 502 of the chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”) 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 the Bankruptcy Code, Bankruptcy Rule 3007, 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**

### **I. The Chapter 11 Cases**

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. 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”).

8. 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.

9. 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.

## **II. The Claims**

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 to Proofs of Claim based on the Additional Omnibus Grounds, which include but are not limited to a Proof of Claim being incorrectly classified.

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.

13. Based on their review of the Books and Records and other relevant documentation, the Debtors have determined that the Claims should each be reclassified from a secured claim to an unsecured non-priority claim. The reason for the reclassification of each Claim is listed on **Exhibit A** attached hereto. Based upon a review of the Claims and the respective supporting documentation, there is no collateral securing each Claim, and accordingly, the Claims are not secured claims pursuant to section 506 of the Bankruptcy Code.

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

14. 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).

15. 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”).

16. 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).

17. Bankruptcy Rule 3007(d) permits objections to multiple claims to be joined in a single omnibus objection, subject to certain conditions, in an effort to streamline the claim objection process and allow debtors to efficiently challenge multiple claims in a single proceeding, thereby reducing procedural complexities and fostering judicial economy. *See generally* Fed. R. Bankr. P. 3007(d).

18. 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).

19. Pursuant to the Omnibus Claims Objection Procedures Order, the Debtors are also 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.

20. Pursuant to the Omnibus Claims Objection Procedures Order, the Debtors object to the Claims identified on **Exhibit A** hereto on the basis that each Claim was incorrectly classified as a secured claim. Failure to reclassify the Claims may result in the Claimants receiving a disproportionately higher recovery against the Debtors on a secured basis to the detriment of other parties-in-interest.

21. Accordingly, the Debtors request that the Court enter an order substantially in the form attached hereto as **Exhibit B**, reclassifying the Claims as unsecured, non-priority claims.

22. 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**

23. 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**

24. The Debtors will provide notice of this Objection to each Claimant set forth on **Exhibit A**, 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**

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

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

26. 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) reclassifying the Claims as general unsecured, non-priority claims and (b) granting such other relief as the Court deems just, equitable, and proper.

*[Remainder of page intentionally left blank]*

Date: August 5, 2025  
Atlanta, GA

Respectfully submitted,

KING & SPALDING LLP

/s/Jeffrey R. Dutson

Jeffrey R. Dutson

Georgia Bar No. 637106

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*Counsel for the Debtors in Possession*

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

**Claims**

<b>Claims</b>						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Secured Claim Amount	Reason for Reclassification <sup>2</sup>
1	A-Alright Plumbing, Inc	OTB Acquisition LLC	25-52416	351	\$18,945.00	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to Barnes & Powers North 1 LLC, which is not a Debtor. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
2	Air System Designs LLC	OTB Holding LLC	25-52415	68	\$11,204.57	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owed by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
3	City of Grandville, MI	OTB Holding LLC	25-52415	158	\$2,401.75	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owed by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
4	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	463	\$3,524.11	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.

<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 Claims listed on this **Exhibit A**. However, the Debtors reserve the right to further object to the Claims during these Chapter 11 Cases.

<sup>2</sup> Because there is no collateral securing each Claim, and accordingly, there is no basis for the secured status asserted with respect to each Claim, the Debtors seek to reclassify each Claim as an unsecured, non-priority claim.

Claims						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Secured Claim Amount	Reason for Reclassification <sup>2</sup>
5	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	464	\$1,039.47	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
6	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	465	\$3,257.66	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
7	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	466	\$892.59	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
8	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	467	\$2,799.24	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
9	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	468	\$2,787.12	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
10	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	469	\$1,301.59	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.

Claims						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Secured Claim Amount	Reason for Reclassification <sup>2</sup>
11	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	470	\$1,235.47	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
12	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	471	\$1,932.25	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
13	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	473	\$1,767.09	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
14	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	474	\$1,876.70	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
15	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	476	\$2,698.16	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
16	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	477	\$2,419.54	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.

Claims						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Secured Claim Amount	Reason for Reclassification <sup>2</sup>
17	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	479	\$1,697.90	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
18	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	480	\$2,390.16	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
19	Kitchen Equipment Professionals, LLC	OTB Acquisition LLC	25-52416	462	\$1,041.40	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
20	Kitchen Equipment Professionals, LLC	OTB Acquisition LLC	25-52416	472	\$2,700.76	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
21	MANSFIELD KDC III LP	OTB Acquisition LLC	25-52416	542	\$7,475.68	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the Claim is on account of lease obligations. Accordingly, the Claim fails to identify any property owned by the Debtors in which the Claimant holds a valid and enforceable security interest.
22	Oma Mex, LLC	OTB Holding LLC	25-52415	396	\$70,957.78	The Claimant does not have a valid secured claim. The Claim does not identify any property owned by the Debtors in which the Claimant holds a valid and enforceable security interest.
23	PA 73 South Association, Inc	OTB Acquisition LLC	25-52416	60	\$2,138.76	The Debtors object to the classification of this Claim as a secured claim, as the Claimant provides no documentation supporting such assertion.

Claims						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Secured Claim Amount	Reason for Reclassification <sup>2</sup>
24	RestorePro Reconstruction, Inc.	OTB Acquisition LLC	25-52416	264	\$79,735.28	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
25	ServiceExperts, Inc.	OTB Acquisition LLC	25-52416	506	\$33,810.43	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the alleged lien is charged to real property that is not owned by the Debtors. Accordingly, the Claimant does not have a security interest in any property of any Debtor.
26	T Twin Creeks TX, LLC	OTB Acquisition LLC	25-52416	622	\$106,634.04	The Debtors object to the classification of this Claim as a secured claim, as the Claim and supporting documentation reflect that the Claimant does not currently have a security interest in any property of the Debtor. The lien referenced by the Claimant in its Claim has expired pursuant to applicable non-bankruptcy law.
27	ZIG Irving, LLC	OTB Holding LLC	25-52415	232	\$554,280.42	The Debtors object to the classification of this Claim as a secured claim, as the Claimant provides no documentation supporting such assertion.

**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’  
THIRD OMNIBUS OBJECTION TO SECURED CLAIMS LISTED ON EXHIBIT A**

This matter is before the Court on the *Debtors’ Third Omnibus Objection to Secured Claims Listed on Exhibit A* [Docket No. [●]] (the “Objection”) of the above captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order reclassifying the secured claims filed by certain claimants (each, a “Claimant,” and collectively, the “Claimants”) identified on **Schedule 1** (collectively, the “Claims”) attached hereto, all as more fully set forth in the

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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.

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 listed on **Schedule 1** hereto are reclassified to general unsecured, non-priority claims in their entirety. For the avoidance of doubt, this Order shall not disallow or expunge any general unsecured portion of the Claims listed on **Schedule 1**. 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:

/s/Jeffrey R. Dutson

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*Counsel for the Debtors in Possession*

**Schedule 1**

**Claims**

#	Name of Claimant	Debtor	Case Number	Claim Number	Original Secured Claim Amount
1	A-Alright Plumbing, Inc	OTB Acquisition LLC	25-52416	351	\$18,945.00
2	Air System Designs LLC	OTB Holding LLC	25-52415	68	\$11,204.57
3	City of Grandville, MI	OTB Holding LLC	25-52415	158	\$2,401.75
4	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	463	\$3,524.11
5	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	464	\$1,039.47
6	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	465	\$3,257.66
7	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	466	\$892.59
8	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	467	\$2,799.24
9	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	468	\$2,787.12
10	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	469	\$1,301.59
11	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	470	\$1,235.47
12	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	471	\$1,932.25
13	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	473	\$1,767.09
14	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	474	\$1,876.70
15	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	476	\$2,698.16
16	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	477	\$2,419.54
17	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	479	\$1,697.90
18	Cold Tex Refrigeration, LLC	OTB Acquisition LLC	25-52416	480	\$2,390.16
19	Kitchen Equipment Professionals, LLC	OTB Acquisition LLC	25-52416	462	\$1,041.40
20	Kitchen Equipment Professionals, LLC	OTB Acquisition LLC	25-52416	472	\$2,700.76
21	MANSFIELD KDC III LP	OTB Acquisition LLC	25-52416	542	\$7,475.68
22	Oma Mex, LLC	OTB Holding LLC	25-52415	396	\$70,957.78
23	PA 73 South Association, Inc	OTB Acquisition LLC	25-52416	60	\$2,138.76
24	RestorePro Reconstruction, Inc.	OTB Acquisition LLC	25-52416	264	\$79,735.28
25	ServiceExperts, Inc.	OTB Acquisition LLC	25-52416	506	\$33,810.43
26	T Twin Creeks TX, LLC	OTB Acquisition LLC	25-52416	622	\$106,634.04
27	ZIG Irving, LLC	OTB Holding LLC	25-52415	232	\$554,280.42