

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

In re:

OTB HOLDING LLC, *et al.*,¹

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' FOURTH
OMNIBUS OBJECTION TO CLAIMS LISTED ON EXHIBITS A-1 AND A-2**

PLEASE TAKE NOTICE that the above captioned debtors and debtors in possession (collectively the “Debtors”) filed the *Debtors’ Fourth Omnibus Objection to Claims Listed on Exhibits A-1 and A-2* (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, 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

¹ 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) and Brooke L. Bean, Esq. (email: 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> , ¹)	Case No. 25-52415 (SMS)
)	
)	
Debtors.)	(Jointly Administered)
_____)	

**DEBTORS' FOURTH OMNIBUS OBJECTION TO
CLAIMS LISTED ON EXHIBITS A-1 AND A-2**

PLEASE CAREFULLY REVIEW THIS OBJECTION AND PLEASE REVIEW EXHIBIT A-1 AND EXHIBIT A-2 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.

¹ 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 AND EXHIBIT A-2 TO THIS OBJECTION.

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby submit the *Debtors’ Fourth Omnibus Objection to Claims Listed on Exhibits A-1 and A-2* (this “Objection”) to those certain claims filed by certain claimants (each, a “Claimant,” and collectively, the “Claimants”) set forth on Exhibit A-1 and Exhibit A-2 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 (i) the priority claims set forth on Exhibit A-1 (the “Priority Claims”) to general unsecured claims and (ii) the administrative priority claims set forth on Exhibit A-2 (the “Administrative Priority Claims”) to general unsecured claims 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 the 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, 502, 503, and 507 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”).²

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. Each Priority Claim listed on Exhibit A-1 attached hereto purports to be entitled to priority status (other than administrative expense priority) and each Administrative Priority Claim listed on Exhibit A-2 attached hereto purports to be entitled to administrative expense priority status. Based on their review of the Books and Records and other relevant documentation, the Debtors have determined each Claim has been misclassified and is not entitled to any type of priority status under the Bankruptcy Code, and, accordingly, the Claims should each be reclassified to general unsecured non-priority claims. The reason for the reclassification of each Claim is listed on the respective exhibit attached hereto.

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

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 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. Bankruptcy Code section 507(a) sets forth various grounds for priority treatment of unsecured claims, including, among others, (a) domestic support obligations (including alimony and child support); (b) deposits toward purchase, lease, or rental of property of services for personal, family or household use; (c) wages, salaries, or commissions earned within 180 days before the Petition Date; (d) taxes or penalties owed to governmental units; and (e) contributions to an employee benefit plan. *See* 11 U.S.C. § 507(a). The Priority Claims claim priority treatment pursuant to one of the foregoing prongs of Bankruptcy Code section 507(a).

I. Priority Claims

21. The Debtors object to the Priority Claims identified on **Exhibit A-1** on the basis that either (i) the Priority Claim is for prepetition services provided and has no basis for priority status under section 507 of the Bankruptcy Code and/or (ii) the Claimant provided insufficient or no documentation to support the alleged priority status of the Priority Claim.

22. Accordingly, the Debtors object to the Priority Claims identified on **Exhibit A-1** as each Claim was misclassified and asserts priority status (other than administrative expense priority status) under the Bankruptcy Code. Failure to reclassify the Priority Claims may result in the

Claimants receiving a disproportionately higher recovery against the Debtors on a priority basis to the detriment of other parties-in-interest.

II. Administrative Priority Claims

23. Each Claimant holding an Administrative Priority Claim assert that their respective Claim is, in whole or in part, entitled to administrative expense priority under Bankruptcy Code section 503(b)(9), which provides, “[a]fter notice and a hearing, there shall be allowed, administrative expenses, other than claims allowed under section 502(f) of this title, including--- the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor's business.” 11 U.S.C. § 503(b)(9). As is set forth below and on Exhibit A-2, none of the Administrative Priority Claims qualify for priority treatment under section 503(b)(9).

24. While a properly executed and timely filed proof of claim that alleges a prepetition claim “is deemed allowed, unless a party in interest . . . objects.” (11 U.S.C. § 502(a)), where a Claimant alleges that its claim is entitled to administrative expense status under Bankruptcy Code section 503, the claimant must both seek allowance and establish entitlement. *See* 11 U.S.C. § 503(b) (allowing administrative expenses only “after notice and a hearing”). Because administrative expenses are given priority over both priority unsecured and general unsecured creditors, it is generally accepted that its requirements must be strictly construed. *See In re Jughandle Brewing Co., LLC*, 2024 Bankr. LEXIS 1305, *6 (Bankr. D.N.J. June 3, 2024).

25. To prevail on a 503(b)(9) claim, a Claimant must establish: (1) that it sold goods to the Debtors; (2) the goods were received by the Debtors within twenty days prior to filing; and

(3) the goods were sold to the Debtors in the ordinary course of business. *In re Goody's Family Clothing, Inc.*, 401 B.R. 131, 133 (Bankr. D. Del. 2009).

26. As detailed on **Exhibit A-2**, the Administrative Priority Claims are subject to this Objection for one or more of the following reasons: (i) the Administrative Priority Claim relates to services rather than goods; (ii) a portion, or the entirety of the Administrative Priority Claim relates to goods that were received by the Debtors, if at all, before twenty (20) days prior to the Petition Date; or (iii) the Claimant failed to provided insufficient or no documentation to support its Administrative Priority Claim. Failure to reclassify the Administrative Priority Claims may result in the Claimants receiving a disproportionately higher recovery against the Debtors on a priority basis to the detriment of other parties-in-interest.

27. 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

28. 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

29. The Debtors will provide notice of this Objection to each Claimant set forth on **Exhibit A-1** and **Exhibit A-2**, 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

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

COMPLIANCE WITH LOCAL RULE 3007-1

31. 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-1¹

Priority Claims

Priority Claims						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Reason for Reclassification ²
1	Alma Tapia Espinoza	OTB Acquisition LLC	25-52416	245	\$6,750.00	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claim and supporting Documentation reflect amounts for services that were performed prepetition and has no basis for priority under section 507 of the Bankruptcy Code.
2	AUBURN HILLS CITY TREASURERS DEPARTMENT	OTB Holding LLC	25-52415	457	\$4,311.83	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claim and supporting documentation reflect postpetition utilities charges for a restaurant location that the Debtors closed prepetition and has no basis for priority under section 507 of the Bankruptcy Code.
3	BRISTOL, ANTONINA	OTB Acquisition LLC	25-52416	255	\$1,654.00	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claimant provides no documentation supporting such assertion. The Debtors do not believe any wages are unpaid.
4	Christopher Fields	OTB Holding LLC	25-52415	217	\$15,000.00	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claimant provides no documentation supporting such assertion. The Debtors do not believe any wages are unpaid.

¹ 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-1**. However, the Debtors reserve the right to further object to the Claims during these Chapter 11 Cases.

² Because there is no basis for the priority status asserted with respect to each Claim, the Debtors seek to reclassify each Claim, or a portion thereto, as a general unsecured, non-priority claim.

Priority Claims						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Reason for Reclassification ²
5	Dean Brother's Landscaping and Maintenance.	OTB Holding LLC	25-52415	87	\$5,334.12	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for priority under section 507 of the Bankruptcy Code.
6	GAGO CONSTRUCTION SERVICES	OTB Holding LLC	25-52415	275	\$50,890.00	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for priority under section 507 of the Bankruptcy Code.
7	GM Handyman Services	OTB Holding LLC	25-52415	125	\$637.50	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for priority under section 507 of the Bankruptcy Code.
8	GREEN PEAS LAWN CARE LLC	OTB Holding LLC	25-52415	295	\$15,150.00	The Debtors object to the classification of a portion of this Claim as entitled to priority under section 507 of the Bankruptcy Code as a portion of the Claim and supporting documentation reflects amounts for performed prepetition and has no basis for priority under section 507 of the Bankruptcy Code.
9	Interstate Refrigeration LLC	OTB Holding LLC	25-52415	164	\$13,555.00	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for priority under section 507 of the Bankruptcy Code.
10	JONES, JOHNATHON	OTB Holding LLC	25-52415	254	\$1,119.13	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claimant provides no documentation supporting such assertion. The Debtors do not believe any wages are unpaid.

Priority Claims						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Reason for Reclassification ²
11	MONKEYSOFT SOLUTIONS INC. dba MONKEY MEDIA SOFTWARE	OTB Holding LLC	25-52415	443	\$69,155.34	The Debtors object to the classification of this Claim as entitled to priority under section 507 of the Bankruptcy Code. The Claimant appears to amend this Claim with Claim No. 503. However, the Claimant failed to include the original claim number (Claim No. 443) in the amended proof of claim. Accordingly, the Debtors are objecting to Claim No. 443 for the avoidance of doubt.
12	Revive LLC	OTB Holding LLC	25-52415	222	\$3,611.45	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for priority under section 507 of the Bankruptcy Code.
13	SALAZAR, VALENTIN	Mt. Laurel Restaurant Operations LLC	25-52419	410	\$4,800.00	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claimant provides no documentation supporting such assertion. The Debtors do not believe any wages are unpaid.
14	Stock and Daughters Landscaping, Inc	OTB Holding LLC	25-52415	91	\$1,180.49	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for priority under section 507 of the Bankruptcy Code.
15	VAUX, JONATHON	OTB Acquisition LLC	25-52416	293	\$600.00	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claimant provides no documentation supporting such assertion. The Debtors do not believe any wages are unpaid.
16	Wendy To	OTB Holding LLC	25-52415	364	\$1,023.30	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claimant provides no documentation supporting such assertion. The Debtors do not believe any wages are unpaid.
17	ZANE, ALYSSA	OTB Holding LLC	25-52415	361	\$400.00	The Debtors object to the classification of this Claim as a claim entitled to priority under section 507 of the Bankruptcy Code as the Claimant provides no documentation supporting such assertion. The Debtors do not believe any wages are unpaid.

Exhibit A-2¹

Administrative Priority Claims

Administrative Priority Claims						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Reason for Reclassification²
1	Alma Tapia Espinoza	OTB Acquisition LLC	25-52416	245	\$6,750.00	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for priority under section 503 of the Bankruptcy Code.
2	CLEARVIEW LIMITED LIABILITY CO	OTB Holding LLC	25-52415	395	\$990.00	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for priority under section 503 of the Bankruptcy Code.
3	GM Handyman Services	OTB Holding LLC	25-52415	125	\$637.50	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for administrative status under section 503 of the Bankruptcy Code.
4	Interstate Refrigeration LLC	OTB Holding LLC	25-52415	164	\$13,555.00	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for administrative status under section 503 of the Bankruptcy Code.

¹ 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-2**. However, the Debtors reserve the right to further object to the Claims during these Chapter 11 Cases.

² Because there is no basis for the administrative status asserted with respect to each Claim, the Debtors seek to reclassify each Claim, or a portion thereto, as an unsecured, non-priority claim.

Administrative Priority Claims						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Reason for Reclassification ²
5	MARSHALL, VANESSA	OTB Acquisition LLC	25-52416	316	\$5,000.00	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claimant provided no documentation to support this Claim.
6	MIDWEST TURF AND LANDSCAPE LLC	OTB Acquisition of Kansas LLC	25-52420	297	\$8,394.28	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for administrative status under section 503 of the Bankruptcy Code.
7	My Grout Guyz	OTB Holding LLC	25-52415	110	\$18,072.14	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claimant provided no documentation to support this Claim.
8	OTB Weathrford llc	OTB Holding LLC	25-52415	201	\$18,778.94	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claimant provided insufficient documentation to support this Claim.
9	ROBERT NASH	OTB Holding LLC	25-52415	390	\$1,732.01	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for administrative status under section 503 of the Bankruptcy Code.
10	ROBERT TSAI	OTB Holding LLC	25-52415	336	\$4,286.70	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for services that were performed prepetition and has no basis for administrative status under section 503 of the Bankruptcy Code.
11	Rose Import Equipments	OTB Acquisition LLC	25-52416	57	\$2,380.00	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for goods delivered more than 20 days prior to the Petition Date and has no basis for administrative status under section 503 of the Bankruptcy Code.

Administrative Priority Claims						
#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount	Reason for Reclassification ²
12	SHOUJEN DANIEL DU AND CHRISTIE ZHENG LI, TRUSTEES OF THE DU AND LI FAMILY TRUST	OTB Acquisition LLC	25-52416	334	\$86,447.00	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for fees under a lease and has no basis for administrative status under section 503 of the Bankruptcy Code.
13	SIMON PROPERTY GROUP, INC., a Delaware corporation	OTB Acquisition LLC	25-52416	127	\$100.00	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for pre-petition rent and has no basis for administrative status under section 503 of the Bankruptcy Code.
14	Wallen Ventures, LLC	OTB Acquisition LLC	25-52416	200	\$22,405.19	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation provide that the Claim is for prepetition rent and has no basis for administrative status under section 503 of the Bankruptcy Code.
15	Western Associates, inc.	OTB Holding LLC	25-52415	160	\$173,231.96	The Debtors object to the classification of this Claim as a claim entitled to administrative status under section 503 of the Bankruptcy Code as the Claim and supporting documentation reflect amounts for goods delivered more than 20 days prior to the Petition Date and has no basis for administrative status under section 503 of the Bankruptcy Code.

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> , ¹)	Case No. 25-52415 (SMS)
)	
)	
Debtors.)	(Jointly Administered)
_____)	

**ORDER SUSTAINING DEBTORS' FOURTH OMNIBUS OBJECTION
TO CLAIMS LISTED ON EXHIBITS A-1 AND A-2**

This matter is before the Court on the *Debtors' Fourth Omnibus Objection to Claims Listed on Exhibits A-1 and A-2* [Docket No. [●]] (the “Objection”) of the above captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order reclassifying the claims filed by certain claimants (each, a “Claimant,” and collectively, the “Claimants”) identified on **Schedule 1** and **Schedule 2** (collectively, the “Claims”) attached hereto, all as more fully set forth

¹ 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.

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 listed on **Schedule 1** and **Schedule 2** 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** or **Schedule 2**. 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

Priority Claims

#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount
1	Alma Tapia Espinoza	OTB Acquisition LLC	25-52416	245	\$6,750.00
2	AUBURN HILLS CITY TREASURERS DEPARTMENT	OTB Holding LLC	25-52415	457	\$4,311.83
3	BRISTOL, ANTONINA	OTB Acquisition LLC	25-52416	255	\$1,654.00
4	Christopher Fields	OTB Holding LLC	25-52415	217	\$15,000.00
5	Dean Brother's Landscaping and Maintenance.	OTB Holding LLC	25-52415	87	\$5,334.12
6	GAGO CONSTRUCTION SERVICES	OTB Holding LLC	25-52415	275	\$50,890.00
7	GM Handyman Services	OTB Holding LLC	25-52415	125	\$637.50
8	GREEN PEAS LAWN CARE LLC	OTB Holding LLC	25-52415	295	\$15,150.00
9	Interstate Refrigeration LLC	OTB Holding LLC	25-52415	164	\$13,555.00
10	JONES, JOHNATHON	OTB Holding LLC	25-52415	254	\$1,119.13
11	MONKEYSOFT SOLUTIONS INC. dba MONKEY MEDIA SOFTWARE	OTB Holding LLC	25-52415	443	\$69,155.34
12	Revive LLC	OTB Holding LLC	25-52415	222	\$3,611.45
13	SALAZAR, VALENTIN	Mt. Laurel Restaurant Operations LLC	25-52419	410	\$4,800.00
14	Stock and Daughters Landscaping, Inc	OTB Holding LLC	25-52415	91	\$1,180.49
15	VAUX, JONATHON	OTB Acquisition LLC	25-52416	293	\$600.00
16	Wendy To	OTB Holding LLC	25-52415	364	\$1,023.30
17	ZANE, ALYSSA	OTB Holding LLC	25-52415	361	\$400.00

Schedule 2

Administrative Priority Claims

#	Name of Claimant	Debtor	Case Number	Claim Number	Original Priority Claim Amount
1	Alma Tapia Espinoza	OTB Acquisition LLC	25-52416	245	\$6,750.00
2	CLEARVIEW LIMITED LIABILITY CO	OTB Holding LLC	25-52415	395	\$990.00
3	GM Handyman Services	OTB Holding LLC	25-52415	125	\$637.50
4	Interstate Refrigeration LLC	OTB Holding LLC	25-52415	164	\$13,555.00
5	MARSHALL, VANESSA	OTB Acquisition LLC	25-52416	316	\$5,000.00
6	MIDWEST TURF AND LANDSCAPE LLC	OTB Acquisition of Kansas LLC	25-52420	297	\$8,394.28
7	My Grout Guyz	OTB Holding LLC	25-52415	110	\$18,072.14
8	OTB Weathrford llc	OTB Holding LLC	25-52415	201	\$18,778.94
9	ROBERT NASH	OTB Holding LLC	25-52415	390	\$1,732.01
10	ROBERT TSAI	OTB Holding LLC	25-52415	336	\$4,286.70
11	Rose Import Equipments	OTB Acquisition LLC	25-52416	57	\$2,380.00
12	SHOUJEN DANIEL DU AND CHRISTIE ZHENG LI, TRUSTEES OF THE DU AND LI FAMILY TRUST	OTB Acquisition LLC	25-52416	334	\$86,447.00
13	SIMON PROPERTY GROUP, INC., a Delaware corporation	OTB Acquisition LLC	25-52416	127	\$100.00
14	Wallen Ventures, LLC	OTB Acquisition LLC	25-52416	200	\$22,405.19
15	Western Associates, inc.	OTB Holding LLC	25-52415	160	\$173,231.96