

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

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

**STIPULATION AND AGREED ORDER
EXTENDING THE EXCLUSIVITY PERIOD
PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE**

This stipulation (this “Stipulation”) is made by and between the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and the Committee (as defined herein), by and through their respective attorneys of record.

RECITALS

WHEREAS, on March 4, 2025 (the “Petition Date”), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”). The Debtors have continued in possession of their properties and have continued to operate and manage their business as

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.



debtors in possession pursuant to sections 1107(a) and 1108 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

WHEREAS, on March 17, 2025, the Office of the United States Trustee for the Northern District of Georgia (the “U.S. Trustee”) appointed an official committee of unsecured creditors in these Chapter 11 Cases (the “Committee”). *See* Docket No. 111. No request has been made for the appointment of a trustee or examiner.

WHEREAS, on July 21, 2025, the Debtors filed the *Debtors’ Amended Joint Chapter 11 Plan as of July 21, 2025* [Docket No. 522] (the “Plan”) and the *Disclosure Statement with Respect to the Amended Joint Chapter 11 Plan Dated as of July 21, 2025* [Docket No. 523] (the “Disclosure Statement”).

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

WHEREAS, on July 24, 2025, the Court entered the *Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Setting a Combined Hearing on Final Approval of the Disclosure Statement and Plan Confirmation; (III) Approving Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Debtors’ Chapter 11 Plan; and (IV) Approving Related Notice and Objection Procedures* [Docket No. 533] (the “Solicitation Procedures Order”).

WHEREAS, the period during which the Debtors have the exclusive right to file a plan under section 1121(c)(3) of the Bankruptcy Code (the “Exclusivity Period”) will expire on August 31, 2025. Pursuant to the Solicitation Procedures Order, the Combined Hearing (as defined in the Solicitation Procedures Order), where the Debtors will seek final approval of the Disclosure Statement and confirmation of the Plan, is on September 5, 2025.

WHEREAS, the U.S. Trustee does not object to the relief sought in this Stipulation.

STIPULATION

Based upon the facts recited above, the Debtors and the Committee (by and through their undersigned counsel) stipulate as follows:

1. The Committee does not object to the relief requested in the proposed order attached hereto as **Exhibit A** (the “Proposed Order”).
2. The Debtors and the Committee request that the Court enter the Proposed Order.

[Remainder of Page Intentionally Left Blank]

DATED: August 18, 2025

EVERSHEDS SUTHERLAND

By: /s/ Todd C. Meyers
Todd C. Meyers
Counsel to the Committee

DATED: August 18, 2025

KING & SPALDING LLP

By: /s/ Jeffrey R. Dutson
Jeffrey R. Dutson
Counsel to the Debtors

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
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In re:)	Chapter 11
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OTB HOLDING LLC, <i>et al.</i> , ¹)	Cases No. 25-52415 (SMS)
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Debtors.)	(Jointly Administered)
_____)	

**AGREED ORDER EXTENDING THE EXCLUSIVITY PERIOD
PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE**

This matter is before the Court on the *Stipulation and Agreed Order Extending the Exclusivity Period Pursuant to Section 1121(d) of the Bankruptcy Code* (the “Stipulation”) [Docket No. [●]] of the above-captioned debtors and debtors in possession (collectively, the “Debtors”). All capitalized terms used but not defined herein shall have the meanings given to them in the Stipulation.

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 Stipulation of the parties is approved and accepted.

Accordingly, IT IS HEREBY ORDERED:

1. The time period set forth in section 1121(c)(3) of the Bankruptcy Code is extended for thirty (30) days through and including September 30, 2025, in accordance with section 1121(d) of the Bankruptcy Code.
2. Entry of this Order is without prejudice to the Debtors' right to request further extensions of the Exclusivity Period pursuant to section 1121(d) of the Bankruptcy Code.
3. The Stipulation and this Order comply with Rule 9006-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the "Local Rules").
4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
5. The Debtors are authorized and empowered to take all actions necessary to effectuate the relief granted in this Order.
6. Notwithstanding Bankruptcy Rule 6004(h), this Order shall be effective immediately upon its entry.
7. The Court retains jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.
8. Counsel for the Debtors, through Kurtzman Carson Consultants, LLC d/b/a Verita Global ("Verita") shall, within three (3) days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first class mail, as applicable, on all parties served with the Motion, and Verita shall file promptly thereafter a certificate of service confirming such service.

[END OF ORDER]

AGREED TO BY:

/s/ Jeffrey R. Dutson

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