

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:)	Chapter 11
)	
OTB HOLDING LLC, et al.,)	Case No. 25-52415 (SMS)
)	
Debtors)	(Jointly Administered)
)	
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KRISTINA FERRALL, Individually and)	Contested Matter
as Representative of the Estate of)	
JOHNATHON FERRELL, and J.D.)	
FERRELL,)	
)	
Movants,)	
)	
v.)	
)	
OTB HOLDING LLC, et al.,)	
)	
Respondents.)	

**CREDITOR TRAVELERS’ OBJECTION TO AGREED ORDER GRANTING MOTION
FOR RELIEF FROM AUTOMATIC STAY TO DETERMINE LIABILITY, LIQUIDATE
CLAIMS AND PROCEED AGAINST THIRD PARTIES AND PURSUE INSURANCE
POLICIES AND PROCEEDS [DKT. NO. 599]**

COMES NOW The Travelers Indemnity Company and those certain of its property casualty insurance and claim administration services affiliates that issued one or more policies or contracts to one of more Debtor(s) (“Travelers”) and files and serves this Objection to Agreed Order Granting Motion for Relief from Automatic Stay to Determine Liability, Liquidate Claims and Proceed Against Third Parties and Pursue Insurance Policies and Proceeds (the “Order”) [Dkt. No. 599] showing this Court the following:

1. The Order was entered on September 8, 2025. Paragraph no. 6 of the Order states that “[t]he insurer shall have twenty-one (21) days from the service of this Order to file an objection to the relief provided in this Order. If an objection is timely filed, counsel for the

Debtors will set such objection for hearing pursuant to the Court's Open Calendar Procedures."

Travelers is the "insurer" referred to in the Order and timely files this Objection. Travelers requests that counsel for the Debtors set the Objection for a hearing as required by the Order.

2. Paragraph no. 2 of the Order states that relief from the automatic stay is granted for the Movants to "pursue the Claim solely against Debtors OTB Acquisition LLC's and OTB Holding LLC's insurer, to collect against non-estate assets including, but not limited to, insurance proceeds, provided however, the insurer may not take collection actions or assert any claim, whether arising prepetition or post petition, as an administrative expense or unsecured claim, against the Debtors or their estates for (i) any amount within the \$150,000 self-insured retention, or (ii) any other amount arising from, relating to, or associated with the Claim, including without limitation any fees, expenses, or defense costs of any kind; and any such costs shall not reduce insurance proceeds available to satisfy other covered claims."

3. Travelers objects to paragraph no. 2 of the Order because its affiliate, Constitution State Services, provides claims administration services to Debtors for claims within Debtors self-insured retention and the policy in excess of the Debtors' self-insured retention. At this time, the self-insured retention has not been exhausted and any insurance that Travelers may be obligated to provide has not been triggered. As such, the Order improperly permits Movant to "pursue" the claim against the excess policy issued by Travelers in violation of its terms as the Debtors' self-insured retention has not been exhausted.

4. Travelers also objects to paragraph no. 2 of the Order to the extent that it: (i) attempts to bar Travelers from asserting any claim against the Debtors related to costs associated with the Claim that may otherwise be permitted by the relevant insurance policies or claim services agreement; or (ii) improperly attempts to modify the language of the relevant insurance

policies and claim service agreement or expand Travelers' obligations under the terms of its insurance policies.

5. Travelers is filing this Objection to preserve its rights in the event it is unable to reach a consensual resolution with the Movants and Debtors.

Respectfully submitted this the 29th day of September, 2025.

WOMBLE BOND DICKINSON (US), LLP

/s/ Arthur A. Ebbs

Arthur A. Ebbs

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within and foregoing:
document was electronically filed with the Clerk of Court using the CM/ECF system which will
automatically send email notification of such filing to all counsel of record.

This 29th day of September, 2025.

By: /s/ Arthur A. Ebbs
Arthur A. Ebbs
State Bar No. 416181