

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: May 27, 2025, 10:00 a.m. (ET)  
)

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that the above captioned debtors and debtors in possession (collectively the “Debtors”) filed the *Debtors’ Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105, 363 and 365 (I) Authorizing and Scheduling an Auction at Which Debtors Will Solicit the Highest or Best Bid for the Sale of Substantially all of Debtors’ Assets, (II) Approving Bidding Procedures Related to Conduct of Auction, (III) Approving Bid Protections, (IV) Approving the Form and Manner of Notices of (A) Proposed Sale of the Debtors’ Assets, the Auction and the Sale Hearing, and (B) Proposed Assumption and Assignment of Executory Contracts and Leases, (V) Approving the Sale of the Assets to the Party Submitting the Highest or Best Bid, and (VI) Granting Related Relief* [Docket No. 62] (the “Motion”) with the Court.

**PLEASE TAKE FURTHER NOTICE** that the Court entered the *Order Pursuant to Bankruptcy Code Sections 105, 363 and 365: (A) Scheduling an Auction; (B) Scheduling the Date, Time and Place for a Hearing on the Proposed Sale Motion; (C) Approving the Form and Manner of the Notice of (I) the Proposed Sale of the Debtors’ Assets, the Auction and the Sale Hearing, and (II) Proposed Assumption and Assignment of Executory Contracts and Leases; and (D) Approving (I) Bidding Procedures, and (II) Bid Protections* [Docket No. 192].

**PLEASE TAKE FURTHER NOTICE** that the Debtors filed the *Notice of Cure Amounts and Proposed Assumption and Assignment of Executory Contracts and Leases* [Docket No. 218], the *First Supplemental Notice of Cure Amounts and Proposed Assumption and Assignment of Executory Contracts and Leases* [Docket No. 317], and the *Second Supplemental Notice of Cure*

<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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*Amounts and Proposed Assumption and Assignment of Executory Contracts and Leases* [Docket No. 396] (collectively, the “Cure Notices”).

**PLEASE TAKE FURTHER NOTICE** that certain contract counterparties have objected to (i) the Cure Costs (as defined in the Motion) stated on the Cure Notices and/or (ii) the assumption and assignment of certain executory contracts or unexpired non-residential real property leases (collectively, the “Outstanding Objections”). The Outstanding Objections are listed hereto on **Exhibit A**.

**PLEASE TAKE FURTHER NOTICE** that the Court will hold a non-evidentiary hearing on the Outstanding Objections at **10:00 a.m. (prevailing Eastern Time) on May 27, 2025, in Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303**, which must be attended 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.)

*[remainder of page intentionally left blank]*

Date: May 20, 2025  
Atlanta, GA

Respectfully submitted,

KING & SPALDING LLP

/s/ Jeffrey R. Dutson

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*Counsel for the Debtors in Possession*

**Exhibit A**

**List of Outstanding Objections**

1. *Objection of Zig Irving, LLC, to Debtors' Notice of Cure Amounts and Proposed Assumption and Assignment of Executory Contracts and Leases and Reservation of Rights* [Docket No. 254]
2. *Objection of Bartel Trust Agreement to Debtors' Notice of Cure Amounts and Proposed Assumption and Assignment of Executory Contracts and Leases and Reservation of Rights* [Docket No. 269]
3. *PAR Capital – Hackberry View, LLC's, Cure Claim Objection to Debtors' Notice of Cure Amounts, Proposed Assumption and Assignment of Executory Contracts and Leases and Reservation of Rights* [Docket No. 270]
4. *Ecolab Inc.'s Limited Objection and Reservation of Rights to Debtors' Notice of cure Amounts and Proposed Assumption and Assignment of Executory Contracts and Leases* [Docket No. 284]
5. *Objection of RTF Urban Renewal, LLC to Notice of Cure Amounts and Proposed Assumption and Assignment of Executory Contracts and Leases* [Docket No. 291]
6. *Objection and Reservation of Rights of Mansfield KDC III LP to Debtors' Notice of Cure Amounts and Proposed Assumption and Assignment of Executory Contracts and Leases and Reservation of Rights* [Docket No. 300]
7. *Objection of Realty Income Corporation to the Notice of Cure Amounts and Proposed Assumption and Assignment of Executory Contracts and Leases* [Docket No. 301]
8. *Limited Objection of BRE DDR BR Fairlane MI LLC, Beltline/Airport Freeway, Ltd. and RiverTown Crossings Mall, LLC to Debtors' Notice of Cure Amounts and Proposed Assumption and Assignment of Executory Contracts and Leases* [Docket No. 302]
9. *GRI Gateway Overlook, LLC's Cure Objection* [Docket No. 306]
10. *Limited Objection of BRE DDR BR Fairlane MI LLC, Beltline/Airport Freeway, Ltd. and RiverTown Crossings Mall, LLC to Proposed Lease Assumptions/Assignment and Reservation of Rights with Respect to the Sale Aspect of the Sale/Bid Procedures Motion* [Docket No. 361]
11. *Limited Objection and Reservation of Rights of Realty Income Corporation Regarding the Sale of the Debtors' Assets* [Docket No. 363]
12. *Objection of Warwick Bald Hill Road, LLC to Debtors' Proposed Assumption and Assignment to*

*OTB Hospitality, LLC of Real Property Lease* [Docket No. 365]