

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: X
: Chapter 11
:
SEQUENTIAL BRANDS GROUP, INC., *et* : Case No. 21-11194 (JTD)
al.,¹ :
: (Jointly Administered)
Debtors. :
: **Ref. Docket No. 668**
X

**CERTIFICATION OF NO OBJECTION REGARDING LIQUIDATING
TRUSTEE'S MOTION TO FURTHER ENLARGE THE PERIOD WITHIN
WHICH IT MAY REMOVE ACTIONS**

The undersigned hereby certifies that:

1. On December 29, 2022, Drivetrain LLC, in its capacity as trustee of the liquidating trust (the "Liquidating Trustee") for the above-captioned debtors and debtors in possession (collectively, the "Debtors"), filed the *Liquidating Trustee's Motion to Further Enlarge the Period Within Which It May Remove Actions* [Docket No. 668] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").
2. Pursuant to the notice of Motion, responses were due to be filed on, or prior to, January 12, 2023, at 4:00 p.m. (ET) (the "Objection Deadline").

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Sequential Brands Group, Inc. (2789), SQBG, Inc. (9546), Sequential Licensing, Inc. (7108), William Rast Licensing, LLC (4304), Heeling Sports Limited (0479), Brand Matter, LLC (1258), SBG FM, LLC (8013), Galaxy Brands LLC (9583), The Basketball Marketing Company, Inc. (7003), American Sporting Goods Corporation (1696), LNT Brands LLC (3923), Joe's Holdings LLC (3085), Gaiam Brand Holdco, LLC (1581), Gaiam Americas, Inc. (8894), SBG-Gaiam Holdings, LLC (8923), SBG Universe Brands, LLC (4322), and GBT Promotions LLC (7003). The mailing address for each Debtor is 105 E. 34th Street, #249, New York, NY 10016. On September 26, 2022, 2022, the Court entered an order [Docket No. 646] closing the chapter 11 cases of the Debtors other than Case No. 21-11194 (JTD), *Sequential Brands Group, Inc.*



3. The undersigned certifies that the Bankruptcy Court's docket has been reviewed in this case and no answer, objection or other responsive pleading to the Motion appears thereon.

4. Accordingly, the Liquidating Trustee respectfully request entry of the Proposed Order attached hereto as **Exhibit 1** at the Bankruptcy Court's convenience.

Dated: January 13, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Timothy P. Cairns

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EXHIBIT 1

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: SEQUENTIAL BRANDS GROUP, INC., ¹ Debtor.)))))))	Chapter 11 Case No. 21-11194 (JTD) (Jointly Administered) Ref. Docket No. 668
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**ORDER FURTHER ENLARGING THE PERIOD WITHIN WHICH
THE LIQUIDATING TRUSTEE MAY REMOVE ACTIONS**

Upon consideration of the motion (the “Motion”)² of Drivetrain LLC, in its capacity as trustee of the liquidating trust (the “Liquidating Trustee”) for the above-captioned debtors and debtors in possession (collectively, the “Debtors”), for entry of an order (this “Order”): (a) enlarging the Removal Period for filing notices of removal of the Actions through and including June 30, 2023, without prejudice to the rights of the Liquidating Trustee to seek further extensions; and (b) granting related relief, all as more fully set forth in the Motion; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that notice of and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The period within which the Liquidating Trustee may seek removal of the Actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 is enlarged through and including June 30, 2023, without prejudice to the rights of the Liquidating Trustee to seek further extensions.
3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
4. The Liquidating Trustee is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.