

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

In re

Sticky's Holdings LLC

Debtor.

Federal EIN: 46-2153586

Chapter 11

Case No. 24-10856

In re

Sticky Fingers LLC

Debtor.

Federal EIN: 45-2463212

Chapter 11

Case No. 24-10857

In re

Sticky Fingers II LLC,

Debtor.

Federal EIN: 80-0957125

Chapter 11

Case No. 24-10858

In re

Sticky Fingers III LLC,

Debtor.

Federal EIN: 47-4233914

Chapter 11

Case No. 24-10859

In re

Sticky Fingers IV LLC,

Debtor.

Federal EIN: 81-3219412

Chapter 11

Case No. 24-10860



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In re Sticky Fingers V LLC, Debtor. Federal EIN: 82-3181465	Chapter 11 Case No. 24-10861
In re Sticky Fingers VI LLC, Debtor. Federal EIN: 82-3210578	Chapter 11 Case No. 24-10862
In re Sticky's BK 1 LLC, Debtor. Federal EIN: 83-2820423	Chapter 11 Case No. 24-10863
In re Sticky's NJ I LLC, Debtor. Federal EIN: 83-1505162	Chapter 11 Case No. 24-10864
In re Sticky Fingers VII LLC, Debtor. Federal EIN: 83-1511491	Chapter 11 Case No. 24-10865

In re Sticky's NJ II LLC, Debtor. Federal EIN: 83-2886642	Chapter 11 Case No. 24-10866
In re Sticky Fingers IX LLC, Debtor. Federal EIN: 84-2555036	Chapter 11 Case No. 24-10867
In re Stickys NJ III LLC, Debtor. Federal EIN: 83-3767036	Chapter 11 Case No. 24-10868
In re Sticky Fingers VIII, LLC, Debtor. Federal EIN: 84-2040080	Chapter 11 Case No. 24-10869
In re Sticky's NJ IV LLC, Debtor. Federal EIN: 86-3616341	Chapter 11 Case No. 24-10870

In re Sticky's WC I LLC, Debtor. Federal EIN: 87-4490427	Chapter 11 Case No. 24-10871
In re Sticky's Franchise LLC, Debtor. Federal EIN: 92-1315232	Chapter 11 Case No. 24-10872
In re Sticky's PA GK I LLC, Debtor. Federal EIN: 85-3257496	Chapter 11 Case No. 24-10873
In re Stickys Corporate LLC, Debtor. Federal EIN: 83-2345719	Chapter 11 Case No. 24-10874
In re Sticky's IP LLC, Debtor. Federal EIN: 92-1324569	Chapter 11 Case No. 24-10875

**DEBTORS' MOTION FOR ENTRY OF AN ORDER
DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) respectfully move (the “Motion”) as follows:

RELIEF REQUESTED

1. The Debtors respectfully request entry of an order, substantially in the form attached as **Exhibit A**, directing joint administration of these cases for procedural purposes only.

2. The Debtors also request that (a) the Court maintain one file and one docket for the jointly-administered chapter 11 cases under the case number assigned to Sticky’s Holdings LLC, and (b) these chapter 11 cases be administered under a consolidated caption, substantially as follows:

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

In re

Sticky’s Holdings LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 24-10856

Jointly Administered

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number are as follows: Sticky’s Holdings LLC (3586); Sticky Fingers LLC (3212); Sticky Fingers II LLC (7125); Sticky Fingers III LLC (3914); Sticky Fingers IV LLC (9412); Sticky Fingers V LLC (1465); Sticky Fingers VI LLC (0578); Sticky’s BK 1 LLC (0423); Sticky’s NJ 1 LLC (5162); Sticky Fingers VII LLC (1491); Sticky’s NJ II LLC (6642); Sticky Fingers IX LLC (5036); Sticky’s NJ III LLC (7036); Sticky Fingers VIII LLC (0080); Sticky NJ IV LLC (6341); Sticky’s WC 1 LLC (0427); Sticky’s Franchise LLC (5232); Sticky’s PA GK I LLC (7496); Stickys Corporate LLC (5719); and Sticky’s IP LLC (4569). The Debtors’ mailing address is 24 E. 23rd Street, New York, NY 10010.

3. The Debtors request that the Court find that the proposed caption satisfies the requirements of section 342(c)(1) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (as amended, the “Bankruptcy Code”).

4. The Debtors also request that an entry be made on the docket of each of the Debtors’ cases, other than the case of Sticky’s Holdings LLC, to reflect the joint administration of these cases, substantially similar to the following:

An Order has been entered in accordance with rule 1015(b) of the Federal Rules of Bankruptcy Procedure and rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware directing joint administration of the chapter 11 cases of the following entities: Sticky’s Holdings LLC; Sticky Fingers LLC; Sticky Fingers II LLC; Sticky Fingers III LLC; Sticky Fingers IV LLC; Sticky Fingers V LLC; Sticky Fingers VI LLC; Sticky’s BK 1 LLC; Sticky’s NJ 1 LLC; Sticky Fingers VII LLC; Sticky’s NJ II LLC; Sticky Fingers IX LLC; Sticky’s NJ III LLC; Sticky Fingers VIII LLC; Sticky NJ IV LLC; Sticky’s WC 1 LLC; Sticky’s Franchise LLC; Sticky’s PA GK I LLC; Stickys Corporate LLC; and Sticky’s IP LLC. The Debtors’ service address in these Chapter 11 matters is Sticky’s Holdings LLC 24 E. 23rd Street, New York, NY 10010. The docket in the chapter 11 case of Sticky’s Holdings LLC, Case No. 24-10856(), should be consulted for all matters affecting the chapter 11 cases of any of the foregoing entities.

5. Further, the Debtors request that the Court authorize them to utilize a combined service list for the jointly-administered chapter 11 cases and that combined notices may be sent to the Debtors’ creditors where appropriate.

JURISDICTION

6. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012. This is a core proceeding

under 28 U.S.C. § 157(b). Venue of these cases and the Motion is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

7. The Debtors consent pursuant to rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

8. The statutory predicate for the relief requested herein are sections 105(a) and 342(c) of the Bankruptcy Code, as supplemented by rule 1015 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Local Rule 1015-1.

BACKGROUND

9. On April 25, 2024 (the “Petition Date”), the Debtors each commenced a voluntary case under chapter 11 of the Bankruptcy Code as a debtor defined in Bankruptcy Code section 1182(1) and the Debtors elected to proceed under Subchapter V of chapter 11 of the Bankruptcy Code pursuant to the Small Business Debtor Reorganization Act, as amended.

10. Additional detail regarding the Debtors, their businesses, the events leading to commencement of these cases, and the facts and circumstances supporting the relief requested herein is set forth in the *Declaration of Jamie Greer in Support of First Day Relief* (the “First Day Declaration”) filed contemporaneously herewith and is incorporated herein by reference.

BASIS FOR RELIEF

11. Under Bankruptcy Rule 1015(b), if “two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint

administration of the estates.” Fed. R. Bankr. P. 1015(b). The Debtors are “affiliates” as that term is defined under section 101(2) of the Bankruptcy Code. Accordingly, this Court is authorized to grant the relief requested herein.

12. Additionally, Local Rule 1015-1 provides that this Court may order joint administration without notice or a hearing upon the filing of a motion requesting such joint administration and an affidavit or verification establishing that joint administration is warranted and will ease the administrative burden for the Court and the parties.

13. As set forth in the First Day Declaration, entry of an order directing joint administration of the Debtors’ chapter 11 cases will avoid duplicative notices, applications and orders, thereby saving the Debtors and parties in interest considerable time and expense, as well as ease the administrative burden on the Court and the parties. The rights of creditors will not be adversely affected because this Motion requests only administrative consolidation of the chapter 11 cases. By aggregating all papers related to the Debtors under the same case caption and docket, creditors and parties in interest will be able to access and review relevant information concerning the Debtors in one place, and will thereby be better able to keep apprised of the matters before this Court.

14. Based on the foregoing, the Debtors submit that the relief requested is necessary and appropriate and in the best interests of their estates and creditors, and should be granted.

NOTICE

15. Notice of this Motion is not required pursuant to Local Rule 1015-1.

CONCLUSION

WHEREFORE, the Debtors respectfully request entry of an order, substantially in the form attached as **Exhibit A**, granting the relief requested herein and such other relief as is just and proper.

Dated: April 25, 2024
Wilmington, Delaware

**PASHMAN STEIN WALDER
HAYDEN, P.C.**

/s/ John W. Weiss

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*Proposed Counsel to the Debtors and
Debtors in Possession*

Exhibit A

Proposed Order

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

In re Sticky's Holdings LLC Debtor. Federal EIN: 46-2153586	Chapter 11 Case No. 24-10856
In re Sticky Fingers LLC Debtor. Federal EIN: 45-2463212	Chapter 11 Case No. 24-10857
In re Sticky Fingers II LLC, Debtor. Federal EIN: 80-0957125	Chapter 11 Case No. 24-10858
In re Sticky Fingers III LLC, Debtor. Federal EIN: 47-4233914	Chapter 11 Case No. 24-10859
In re Sticky Fingers IV LLC, Debtor. Federal EIN: 81-3219412	Chapter 11 Case No. 24-10860

In re Sticky Fingers V LLC, Debtor. Federal EIN: 82-3181465	Chapter 11 Case No. 24-10861
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In re Sticky Fingers VI LLC, Debtor. Federal EIN: 82-3210578	Chapter 11 Case No. 24-10862
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In re Sticky's BK 1 LLC, Debtor. Federal EIN: 83-2820423	Chapter 11 Case No. 24-10863
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In re Sticky's NJ I LLC, Debtor. Federal EIN: 83-1505162	Chapter 11 Case No. 24-10864
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In re Sticky Fingers VII LLC, Debtor. Federal EIN: 83-1511491	Chapter 11 Case No. 24-10865
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In re Sticky's NJ II LLC, Debtor. Federal EIN: 83-2886642	Chapter 11 Case No. 24-10866
In re Sticky Fingers IX LLC, Debtor. Federal EIN: 84-2555036	Chapter 11 Case No. 24-10867
In re Stickys NJ III LLC, Debtor. Federal EIN: 83-3767036	Chapter 11 Case No. 24-10868
In re Sticky Fingers VIII, LLC, Debtor. Federal EIN: 84-2040080	Chapter 11 Case No. 24-10869
In re Sticky's NJ IV LLC, Debtor. Federal EIN: 86-3616341	Chapter 11 Case No. 24-10870

In re Sticky's WC I LLC, Debtor. Federal EIN: 87-4490427	Chapter 11 Case No. 24-10871
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In re Sticky's Franchise LLC, Debtor. Federal EIN: 92-1315232	Chapter 11 Case No. 24-10872
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In re Sticky's PA GK I LLC, Debtor. Federal EIN: 85-3257496	Chapter 11 Case No. 24-10873
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In re Stickys Corporate LLC, Debtor. Federal EIN: 83-2345719	Chapter 11 Case No. 24-10874
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In re Sticky's IP LLC, Debtor. Federal EIN: 92-1324569	Chapter 11 Case No. 24-10875
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ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES

Upon the motion (the “Motion”)¹ of the Debtors for entry of an order (this “Order”) pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 1015(b) and Local Rule 1015-1, directing joint administration of the Debtors’ related chapter 11 cases, all as more fully described in the Motion; and notice of the Motion not having been required pursuant to Local Rule 1015-1; and it appearing that the relief requested by this Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; 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 above-captioned cases are consolidated for procedural purposes only and shall be jointly administered under Case No. 24-10856 ().
3. The Clerk of Court shall maintain one file and one docket for these jointly administered cases, which file and docket shall be the file and docket for Sticky’s Holdings LLC, Case No. 24-XXXX ().
4. The caption of the jointly administered cases shall read as follows:

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

<p>In re Sticky’s Holdings LLC, <i>et al.</i>, Debtors.¹</p>	<p>Chapter 11 Case No. 24-10856 Jointly Administered</p>
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¹ Capitalized terms not defined herein are defined in the Motion.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number are as follows: Sticky's Holdings LLC (3586); Sticky Fingers LLC (3212); Sticky Fingers II LLC (7125); Sticky Fingers III LLC (3914); Sticky Fingers IV LLC (9412); Sticky Fingers V LLC (1465); Sticky Fingers VI LLC (0578); Sticky's BK 1 LLC (0423); Sticky's NJ 1 LLC (5162); Sticky Fingers VII LLC (1491); Sticky's NJ II LLC (6642); Sticky Fingers IX LLC (5036); Sticky's NJ III LLC (7036); Sticky Fingers VIII LLC (0080); Sticky NJ IV LLC (6341); Sticky's WC 1 LLC (0427); Sticky's Franchise LLC (5232); Sticky's PA GK I LLC (7496); Stickys Corporate LLC (5719); and Sticky's IP LLC (4569). The Debtors' mailing address is 24 E. 23rd Street, New York, NY 10010.

5. All pleadings and other papers filed in these chapter 11 cases shall bear the foregoing consolidated caption.

6. The foregoing consolidated caption satisfies the requirements of section 342(c)(1) of the Bankruptcy Code.

7. A docket entry shall be made in each of the above-captioned cases substantially as follows:

An Order has been entered in accordance with rule 1015(b) of the Federal Rules of Bankruptcy Procedure and rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware directing joint administration of the chapter 11 cases of the following entities: Sticky's Holdings LLC; Sticky Fingers LLC; Sticky Fingers II LLC; Sticky Fingers III LLC; Sticky Fingers IV LLC; Sticky Fingers V LLC; Sticky Fingers VI LLC; Sticky's BK 1 LLC; Sticky's NJ 1 LLC; Sticky Fingers VII LLC; Sticky's NJ II LLC; Sticky Fingers IX LLC; Sticky's NJ III LLC; Sticky Fingers VIII LLC; Sticky NJ IV LLC; Sticky's WC 1 LLC; Sticky's Franchise LLC; Sticky's PA GK I LLC; Stickys Corporate LLC; and Sticky's IP LLC. The Debtors' service address in these Chapter 11 matters is Sticky's Holdings LLC 24 E. 23rd Street, New York, NY 10010. The docket in the chapter 11 case of Sticky's Holdings LLC, Case No. 24-10856(), should be consulted for all matters affecting the chapter 11 cases of any of the foregoing entities.

8. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of the Debtors or the Debtors' estates.

9. The Debtors are authorized to utilize a combined service list for the Debtors' jointly-administered cases and may send combined notices to creditors of the Debtors and other parties in interest where appropriate.

10. The Debtors and the Clerk of the Court are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

11. Notwithstanding the possible applicability of Bankruptcy Rules 6004(h), 7062, 9014 or otherwise, this Order shall be immediately effective and enforceable upon its entry.

12. The Court retains jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.

Dated: _____, 2024
Wilmington, Delaware

UNITED STATES BANKRUPTCY JUDGE