

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 (JKS)

Jointly Administered

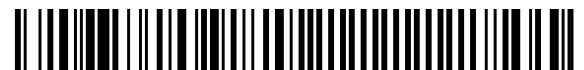
Re. D.I. 12

**CERTIFICATE OF COUNSEL REGARDING
DEBTORS' MOTION FOR ENTRY OF INTERIM AND
FINAL ORDERS (I) AUTHORIZING CONTINUED USE OF
CASH MANAGEMENT SYSTEM, (II) AUTHORIZING USE OF
PREPETITION BANK ACCOUNTS AND PAYMENT METHODS, (III) AUTHORIZING
USE OF EXISTING BUSINESS FORMS, (IV) AUTHORIZING CONTINUATION OF
ORDINARY COURSE INTERCOMPANY TRANSACTIONS, (V) GRANTING
ADMINISTRATIVE PRIORITY TO POST-PETITION INTERCOMPANY CLAIMS, (VI)
EXTENDING TIME TO COMPLY WITH THE REQUIREMENTS OF 11 U.S.C. § 345(b),
(VII) SCHEDULING A FINAL HEARING, AND (VIII) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession
(collectively, the "Debtors") hereby certifies as follows:

1. On April 25, 2024, the Debtor filed the *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Continued Use of Cash Management System, (II) Authorizing Use of Prepetition Bank Accounts and Payment Methods, (III) Authorizing Use of Existing Business Forms, (IV) Authorizing Continuation of Ordinary Course Intercompany Transactions, (V) Granting Administrative Priority to Post-Petition Intercompany Claims, (VI) Extending Time to*

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Comply with the Requirements of 11 U.S.C. § 345(b), (VII) Scheduling a Final Hearing, and (VIII) Granting Related Relief [D.I. 12] (the “Motion”).

2. A hearing was held on April 26, 2024 (the “Hearing”) to consider the Motion.

3. Attached hereto as **Exhibit A** is the proposed order (the “Proposed Order”) that incorporates certain revisions made to the form of order filed with the Motion. Attached hereto as **Exhibit B** is a blackline of the Proposed Order compared to the form of order filed with the Motion.

WHEREFORE, the Debtor respectfully requests that Court enter the Proposed Order substantially in the form attached here as **Exhibit A** at the earliest convenience of the Court.

Dated: April 26, 2024
Wilmington, Delaware

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

/s/ John W. Weiss

John W. Weiss (No. 4160)
Joseph C. Barsalona II (No. 6102)
1007 North Orange Street, 4th Floor, Suite 183
Wilmington, DE 19801-1242
Telephone: (302) 592-6496
Email: jweiss@pashmanstein.com
jbarsalona@pashmanstein.com

-and-

Richard C. Solow (admitted *pro hac vice*)
Katherine R. Beilin (admitted *pro hac vice*)
Court Plaza South, East Wing
21 Main Street, Suite 200
Hackensack, NJ 07601
Telephone: (201) 488-8200
Email: rsolow@pashmanstein.com
kbeilin@pashmanstein.com

*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, *et al.*,

Debtors.¹

Chapter 11

Case No. 24-10856 (JKS)

Joint Administration Requested

Re. D.I. 12

**INTERIM ORDER (I) AUTHORIZING CONTINUED USE OF
CASH MANAGEMENT SYSTEM, (II) AUTHORIZING USE OF PREPETITION BANK
ACCOUNTS AND PAYMENT METHODS, (III) AUTHORIZING USE OF EXISTING
BUSINESS FORMS, (IV) AUTHORIZING CONTINUATION OF ORDINARY
COURSE INTERCOMPANY TRANSACTIONS, (V) GRANTING ADMINISTRATIVE
PRIORITY TO POST-PETITION INTERCOMPANY CLAIMS, (VI) EXTENDING
TIME TO COMPLY WITH THE REQUIREMENTS OF 11 U.S.C. § 345(b),
(VII) SCHEDULING A FINAL HEARING, AND (VIII) GRANTING RELATED RELIEF**

Upon the motion (the "Motion")² of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an interim order (this "Interim Order") and final order pursuant to sections 105(a), 345(b) and 363(c)(1) of the Bankruptcy Code, Bankruptcy Rules 6003 and 6004 and Local Rule 9013-l(m): (i) authorizing the Debtors to continue to utilize their prepetition cash management system, including by authorizing the Debtors' bank to honor certain transfers and charge certain fees and other amounts; (ii) authorizing use of prepetition bank accounts, account control agreements, and payment methods; (iii) authorizing the Debtors to maintain and continue to use their existing business forms; (iv) authorizing the Debtors to continue

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

ordinary course intercompany transactions; (v) granting administrative priority to post-petition intercompany claims; (vi) extending the Debtors' time to comply with the requirements of section 345(b) of the Bankruptcy Code; (vii) scheduling the Final Hearing, to the extent necessary, to consider entry of a final order; and (viii) granting related relief, all as more fully described in the Motion; and upon consideration of the First Day Declaration; and due and sufficient notice of the Motion having been given under the circumstances; and it appearing that no other or further notice need be provided under the circumstances; 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 on an interim basis as set forth herein.
2. The Debtors are authorized consistent with this Interim Order to continue to use the Cash Management System, including the Bank Accounts, in the ordinary course of business and to implement any changes to the Cash Management System as the Debtors deem necessary or appropriate.
3. The Debtors are further authorized to: (i) continue to use, with the same account numbers, the Bank Accounts in existence on the Petition Date, and need not comply with certain guidelines relating to bank accounts set forth in the U.S. Trustee Operating Guidelines, including, without limitation, the requirement to establish separate accounts for cash collateral and/or tax payments, (ii) treat the Bank Accounts for all purposes as accounts of the Debtors as debtors in possession; (iii) deposit funds in and withdraw funds from the Bank Accounts by all usual means, including, without limitation, by check, wire transfer and other methods; (iv) pay the Service Charges, including, without limitation, any undisputed Service Charges regardless of

whether such Service Charges arose before, on or after the Petition Date; and (v) otherwise perform their obligations under the documents governing the Bank Accounts.

4. The Debtors are authorized, but not directed, to honor and pay all undisputed prepetition Service Charges in an amount not to exceed \$2,000.00, and the Banks are hereby authorized to debit, charge, or deduct, as applicable, such undisputed amounts in the ordinary course of business.

5. The Debtors are authorized to use, in their present form, all Business Forms and other documents related to the Bank Accounts, without reference to their status as debtors in possession; *provided* that once the Debtors' existing checks have been used, the Debtors shall, when reordering checks, require the designation "Debtor in Possession" and the corresponding bankruptcy case number on all checks; *provided further however*, that with respect to any checks which the Debtors may print themselves, the Debtors shall begin printing "debtor in possession" or "DIP" and the case number for the Chapter 11 Cases on such items within ten (10) days of the date of the entry of this Interim Order.

6. The Debtors are authorized to open new bank accounts or close any Bank Accounts as they may deem necessary and appropriate in their sole discretion without further order of this Court; *provided, however*, that the Debtors shall provide the U.S. Trustee and the Subchapter V Trustee at least fifteen (15) days' advance notice of the opening of any new bank accounts or closing of any Bank Account; and *provided further*, to the extent the Debtors open any new bank accounts, the Debtors shall open such new bank account(s) at a bank that has executed a Uniform Depository Agreement with the U.S. Trustee, or at a bank that is willing to immediately execute such an agreement

7. The Banks are authorized to debit the Debtors' Bank Accounts in the ordinary course of business without the need for further order of this Court for: (i) all drafts, electronic fund transfers (including wires or ACH transfers), credit card payments and checks drawn on the Debtors' Bank Accounts which are cashed at the Banks' counters or exchanged for cashier's checks by the payees thereof prior to the Petition Date; (ii) all checks or other items deposited in one of the Debtors' Bank Accounts with the Banks prior to the Petition Date which have been dishonored or returned unpaid for any reason, together with any fees and costs in connection therewith, to the same extent the Debtors were responsible for such items prior to the Petition Date; and (iii) all undisputed prepetition amounts outstanding as of the date hereof, if any, owed to the Banks as Service Charges for the maintenance of the Cash Management System.

8. The Banks may rely on the representations of the Debtors with respect to whether any check or other payment order drawn or issued by the Debtors prior to the Petition Date should be honored pursuant to this or any other order of this Court, and the Banks shall not have any liability to any party for relying on such representations by the Debtors as provided for herein.

9. Any existing deposit agreements between the Debtors and the Banks, shall continue to govern the post-petition cash management relationship between the Debtors and the Banks, and all of the provisions of such agreements, including, without limitation, the termination and fee provisions, shall remain in full force and effect.

10. The Debtors are authorized but not directed to continue performing Intercompany Transactions in the ordinary course of business on a post-petition basis. All Intercompany Claims arising after the Petition Date shall be identified as such and accorded

administrative expense priority in accordance with sections 364(b), 503(b) and 507(a)(2) of the Bankruptcy Code.

11. In connection with the ongoing utilization of the Cash Management System, the Debtors shall continue to maintain records with respect to all transfers of cash in the ordinary course so that all transactions (including Intercompany Transactions) may be readily ascertained, traced, recorded properly, and distinguished between prepetition and post-petition transactions and shall make such records available to the U.S. Trustee upon request. The Debtors shall not make any intercompany loans or transfers to non-Debtor affiliates absent further order of the Court.

12. The Debtors shall have 30 days from the date of this Interim Order to comply with the requirements of section 345(b) of the Bankruptcy Code, to the extent applicable, without prejudice to the Debtors' rights to seek a further extension of time or to seek to deviate from the requirements of section 345(b) of the Bankruptcy Code on a further interim or a final basis; *provided, however*, that the rights of the U.S. Trustee are fully preserved to the extent the Banks do not sign a Uniform Depository Agreement with the U.S. Trustee.

13. As soon as possible, the Debtors shall provide the Banks with the Debtors' employer identification number, identify each of their Bank Accounts held at the Banks as being held by a debtor in possession in a bankruptcy case and provide the case number.

14. As soon as practicable after entry of this Interim Order, the Debtors shall serve a copy of this Interim Order on the Banks.

15. The Debtors are authorized to take, or cause to be taken, all actions necessary to effectuate the relief granted pursuant to this Interim Order in accordance with the Motion.

16. The requirements set forth in Bankruptcy Rule 6003 are satisfied by the contents of the Motion.

17. The requirement of Bankruptcy Rule 6004(a) is waived.

18. The Final Hearing on the Motion will be held on May 20, 2024, at 1:00 p.m. (Eastern Time). Objections or responses, if any, to the entry of a final order on the Motion shall be filed no later than 4:00 p.m. (Eastern Time) on May 13, 2024 (the “Objection Deadline”) and served so as to be received by the Objection Deadline on (a) proposed counsel to the Debtors, Pashman Stein Walder Hayden, P.C., 1007 North Orange Street, 4th Floor, Suite #183, Wilmington, Delaware, 19801-1242, Attn: John W. Weiss (jweis@pashmanstein.com); Joseph C. Barsalona II (jbarsalona@pashmanstein.com), Richard C. Solow (rsolow@pashmanstein.com) and Katherine R. Beilin (kbeilin@pashmanstein.com), (b) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware, 19801, Attn: Joseph F. Cudia (joseph.cudia@usdoj.gov) and Jonathan W. Lipshie (Jon.Lipshie@usdoj.gov), and (c) the Subchapter V Trustee, Natasha Songonuga, VTrustee LLC, P.O. Box 841, Wilmington, DE 19899 (Nsongonuga@VTrusteelc.com).

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

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

Exhibit 1**Debtors' Accounts**

	Account Holder	Bank Name	Last Four Digits of Account # and Address
1.	Sticky's Holdings LLC	JPMorgan Chase Bank, N.A.	0739 PO Box 182051 Columbus, OH 43218-2051
2.	Sticky's Holdings LLC	JPMorgan Chase Bank, N.A.	6833 PO Box 182051 Columbus, OH 43218-2051
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9.	Sticky's Holdings LLC	Bank of America, N.A.	1436 PO Box 15284 Wilmington, DE 19850
10.	Sticky's Holdings LLC	M&T Bank	3387

			1018 Washington St., Hoboken, NJ 07030
11.	Sticky's Holdings LLC	BCB Bank	1412 591-595 Avenue C Bayonne, NJ 07002

Exhibit B

Blackline

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Debtors.¹

Chapter 11

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Joint Administration Requested

Re. D.I. [-12](#)

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Date: _____, 2024
Wilmington, Delaware

~~UNITED STATES BANKRUPTCY JUDGE~~

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Summary report: Litera Compare for Word 11.7.0.54 Document comparison done on 4/26/2024 4:36:10 PM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original filename: Sticky - Proposed Interim Cash Management Order (Filing Version)(4189205.1).docx	
Modified filename: Sticky - Proposed Interim Cash Management Order Revised(4189211.1).docx	
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<u>Add</u>	7
Delete	9
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<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	16