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

In re

Sticky's Holdings LLC, et al.,

Reorganized Debtors.<sup>1</sup>

Chapter 11

Case No. 24-10856 (JKS)

Jointly Administered

Re D.I.: 545

### REORGANIZED DEBTORS' AMENDED WITNESS AND EXHIBIT LIST FOR HEARING ON APRIL 29, 2025 AT 1:00 P.M. (ET)

The above-captioned reorganized debtors and debtors in possession (collectively, the "<u>Reorganized Debtors</u>") hereby submit this witness and exhibit list in connection with the hearing scheduled for **April 29, 2025 at 1:00 p.m. (ET)** before the Honorable J. Katie Stickles, of the United States Bankruptcy Court of the District of Delaware, 824 N. Market Street, 6<sup>th</sup> Floor, Courtroom No. 1, Wilmington, Delaware 19801 (the "<u>Hearing</u>") for the *Reorganized Debtors*' *Motion for Entry of an Order (I) Authorizing Entry into Proposed Letter of Intent with Harker Palmer Investors LLC; (II) Authorizing Reorganized Debtors and their Professionals to Perform Obligations Thereunder; and (III) Granting Related Relief [D.I. 545] (the "<u>Motion</u>"),<sup>2</sup> filed on April 3, 2025.* 

<sup>&</sup>lt;sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.



<sup>&</sup>lt;sup>1</sup> The Reorganized Debtors in these cases, along with the last four digits of each Reorganized 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 I 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 Reorganized Debtors' mailing address is 21 Maiden Lane, New York, NY 10038.

### **WITNESSES**

The Reorganized Debtors designate the following as witnesses in connection with the Motion:

1) Ms. Jamie Greer, CEO of the Reorganized Debtors.

Ms. Greer's testimony will be in connection with (a) the Reorganized Debtors' financial condition and operations, (b) the Reorganized Debtors' evaluation and negotiation of bids received from various parties proposing (i) an acquisition of all or a portion of the Reorganized Debtors' assets and/or (ii) providing financing to the Reorganized Debtors, and (c) the reasons why she recommended, and the Reorganized Debtors' board of directors approved, entry into the Harker Palmer LOI, as well as any testimony needed to support the facts set forth in the *Declaration of Jamie Greer in Support of Reorganized Debtors' Motion for Entry of an Order (I) Authorizing Reorganized Debtors' Entry Into Proposed Letter of Intent with Harker Palmer Investors LLC; (II) Authorizing Reorganized Debtors and their Professionals to Perform Obligations Thereunder; and (III) Granting Related Relief* (D.I. 571).

The Reorganized Debtors also cross-designate all witnesses designated by any other party in connection with the Motion, and reserve the right to call any necessary rebuttal or impeachment witnesses.

## **EXHIBITS RELATING TO REORGANIZED DEBTORS' CASE IN CHIEF**

The Reorganized Debtors designate the following exhibits that may be used in connection with the Motion:

Exhibit	Document Description	Docket No.
	Declaration of Jamie Greer in Support of Reorganized	
1	Debtors' Motion for Entry of an Order (I) Authorizing	D.I. 571
	Reorganized Debtors' Entry into Proposed Letter of Intent	D.1. 371
	with Harker Palmer Investors LLC; (II) Authorizing	

Exhibit	Document Description	Docket No.
	Reorganized Debtors and their Professionals to Perform Obligations Thereunder; and (III) Granting Related Relief	
2	Executed Non-Binding Letter of Intent with Harker Palmer Investors LLC	D.I. 565-1, Exhibit 1 to Exhibit A
3	Supplement to Executed Non-Binding Letter of Intent with Harker Palmer Investors LLC	D.I. 565-1, Exhibit 2 to Exhibit A
4	Proof of Funds	D.I. 571-4, Ex. D
5	Escrow Letter for Second Earnest Money Deposit	D.I. 560-2, Ex. B
6	Subchapter V Debtors' Modified First Amended Plan of Reorganization	D.I. 368
7	Findings of Fact, Conclusions of Law, and Order Confirming Subchapter V Debtors' Modified First Amended Plan of Reorganization	D.I. 398
8	April 23, 2025 FTW Proposal	D.I. 571 -5, Ex. E

# EXHIBITS RELATING TO ANY POTENTIAL REBUTTAL CASE

The Reorganized Debtors designate the following exhibits that may be used in connection

with any rebuttal case it may elect to present concerning the Motion:

Exhibit	Document Description	Docket No.
	Any exhibit identified or offered by any other party.	

Dated: April 28, 2025 Wilmington, Delaware

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

/s/ Henry J. Jaffe John W. Weiss (No. 4160) Henry J. Jaffe (No. 2987) Joseph C. Barsalona II (No. 6102) 824 North Market Street, Suite 800 Wilmington, DE 19801 Telephone: (302) 592-6496 Email: jweiss@pashmanstein.com hjaffe@pashmanstein.com

- and -

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Counsel to the Reorganized Debtors and Debtors in Possession