

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

**NOTICE OF *SECOND AMENDED*² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON APRIL 29, 2025 AT 1:00 P.M. (ET)**

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Stickles's Chambers Procedures (<https://www.deb.uscourts.gov/judge-j-kate-stickles>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Stickles's expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Eastern time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

RESOLVED MATTERS:

1. Motion of Brooks Shopping Centers, LLC (I) To Compel Rejection of Lease Under 11 U.S.C. § 365(a); (II) For Allowance of an Administrative Claim for Unpaid Post-Petition Lease Obligations Under § 503(b); (III) For Relief from or to Vacate the Automatic Stay Under 11 U.S.C. § 362(b); and (IV) to Waive the Stay of Enforcement of Any Order Under Fed. R. Bankr. P. 4001(3) ([D.I. 551](#), filed 04/15/2025)

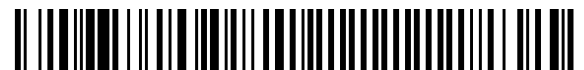
Objection Deadline: April 22, 2025, at 4:00 p.m. (ET).

Responses Received: None

Related Pleadings:

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 I LLC (0423); Sticky's NJ I 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 I 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 21 Maiden Lane, New York, NY 10038.

² *Amended items appear in bold and italicized.*



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- A. Certificate of No Objection Regarding Motion of Brooks Shopping Centers, LLC (I) to Compel Rejection of Lease Under 11 U.S.C. § 365(a); (II) For Allowance of an Administrative Claim for Unpaid Post-Petition Lease Obligations Under § 503(b); (III) For Relief from or to Vacate the Automatic Stay Under 11 U.S.C. § 362(b); and (IV) to Waive the Stay of Enforcement of Any Order Under Fed. R. Bankr. P. 4001(3) ([D.I. 564](#), filed 04/23/2025)
- B. Order Granting Motion of Brooks Shopping Centers, LLC (I) to Compel Rejection of Lease Under 11 U.S.C. § 365(a); (II) For Allowance of an Administrative Claim for Unpaid Post-Petition Lease Obligations Under § 503(b); (III) For Relief from or to Vacate the Automatic Stay Under 11 U.S.C. § 362(b); and (IV) to Waive the Stay of Enforcement of Any Order Under Fed. R. Bankr. P. 4001(3) ([D.I. 574](#), filed 04/28/2025)***

Status: The Court entered the order. No hearing is necessary.

MATTERS GOING FORWARD:

2. 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](#), filed 04/03/2025)

Objection Deadline: April 22, 2025, at 4:00 p.m. (ET). The objection deadline was extended until April 23, 2025 at 10:00 a.m. (ET) for SRI-WRA Properties I, LLC and UE Bergen Mall Owner LLC. The objection deadline was further extended until April 23, 2025 at 4:00 p.m. (ET) for SRI-WRA Properties I, LLC and UE Bergen Mall Owner LLC.

Responses Received:

- A. Limited Objection and Reservation of Rights by Brooks Shopping Centers, LLC with Respect to 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. 561](#), filed 04/22/2025)
- B. Statement and Reservation of Rights of Subchapter V Trustee as to 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. 562](#), filed 04/22/2025)
- C. Limited Objection and Reservation of Rights of SRI-WSA Properties I, LLC and UE Bergen Mall Owner LLC to 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. 563](#), filed 04/23/2025)

- D. Harker Palmer Investors LLC's Reply to Limited Objections to Reorganized Debtors' 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. 577](#), filed 04/29/2025)***
- E. Joinder by ESRT 10 Union Square LLC to: Limited Objection and Reservation of Rights of SRI-WSA Properties I, LLC and UE Bergen Mall Owner LLC to 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. 578](#), filed 04/29/2025)***

Related Pleadings:

- F. Reorganized Debtors' Motion for Entry of an Order Shortening Notice of Hearing on 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. 546](#), filed 04/03/2025)
- G. Order Shortening Notice of Hearing on 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. 549](#), filed 04/11/2025)
- H. Notice of Hearing Regarding 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. 550](#), filed 04/14/2025)
- I. Notice of Filing of Supplement to Exhibit to 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. 553](#), filed 04/17/2025)

- J. Statement of Harker Palmer Investors LLC in Support of: 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. 560](#), filed 04/22/2025)
- K. Notice of Filing of Proposed 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. 565](#), filed 04/23/2025)
- L. Reorganized Debtors' Witness List and Exhibit List for Hearing on April 29, 2025 at 1:00 pm [[D.I. 567](#), filed 04/25/2025]
- M. Motion by ESRT 10 Union Square LLC to Allow Late-Filed Joinder to: Limited Objection and Reservation of Rights of SRI-WSA Properties I, LLC and UE Bergen Mall Owner LLC to 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. 569](#), filed 04/28/2025]
- N. Harker Palmer Investors LLC's Motion for Leave to File a Late Reply to Limited Objections to 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. 570](#), filed 04/28/2025]
- O. Declaration of Jamie Greer in Support of Reorganized Debtors' Motion for Entry of an Order (I) Authorizing 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](#), filed 04/28/2025]
- P. Reorganized Debtors' Amended Witness List and Exhibit List for Hearing on April 29, 2025 at 1:00 pm [[D.I. 572](#), filed 04/28/2025]
- Q. *Order Granting Motion by ESRT 10 Union Square LLC for Leave to File a Joinder to the Limited Objection to: 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. 575](#), filed 04/28/2025)***

R. Order Granting Harker Palmer Investors LLC's Motion for Leave to File a Late Reply to Limited Objections to 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. 576](#), filed 04/28/2025)

Status: This matter is going forward.

Dated: April 29, 2025
Wilmington, Delaware

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

/s/ John W. Weiss

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