

**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

**Obj. Deadline: TBD**

**Hearing Date: TBD**

**MOTION TO EXTEND DEADLINE TO FILE OBJECTIONS TO CLAIMS**

The above-captioned reorganized debtors (the “Reorganized Debtors”), by and through their undersigned counsel, hereby move this Court (the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), extending the time period to file and serve objections to claims (the “Claims Objection Deadline”) by approximately 120 days to September 9, 2025. In support of the Motion, the Reorganized Debtors respectfully represent as follows:

**JURISDICTION AND VENUE**

1. The Court has jurisdiction over the 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 February 29, 2012. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Pursuant to Rule 9013-

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<sup>1</sup> 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 21 Maiden Lane, New York, NY 10038.



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1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court of the District of Delaware (the “Local Rules”), the Reorganized Debtors confirm their consent 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.

2. Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are section 105 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Rule 9006-2.

### **BACKGROUND**

4. On April 25, 2024 (the “Petition Date”), the Reorganized Debtors commenced voluntary cases under chapter 11 of the Bankruptcy Code as debtors 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.

5. On April 26, 2024, the United States Trustee appointed Natasha Songonuga, Esq., of Archer & Greiner, P.C. to serve as the Subchapter V trustee (the “Subchapter V Trustee”) in these cases pursuant to Bankruptcy Code section 1183(a).

6. On April 30, 2024, the Court filed the *Notice of Chapter 11 Bankruptcy Case* (the “Chapter 11 Notice”) [D.I. 71] which established, among other things, June 24, 2024 (the “Bar Date”), as the deadline for any person or entity, other than a governmental unit, to file a proof of claim in respect of any prepetition claims against the Debtors, including secured, priority, 503(b)(9) claims, and unsecured claims. The Chapter 11 Notice further established October 22,

2024 (the “Government Bar Date”), as the deadline for governmental units to file a proof of claim in respect of any prepetition claims against the Debtors.

7. On April 26, 2024, the Court entered an order authorizing the Debtors to retain Kurtzman Carson Consultants LLC (“KCC”)<sup>2</sup> as claims and noticing agent (the “Claims Agent”) in these chapter 11 cases [D.I. 42]. The Claims Agent is authorized and directed to, among other things, (i) perform noticing services and to receive, maintain, record and otherwise administer the proofs of claim (each a “Proof of Claim”) filed in these chapter 11 cases, (ii) serve as the custodian of court records, (iii) serve as the authorized repository for all Proofs of Claim, and (iv) maintain an official claims register for the Reorganized Debtors (the “Claims Register”).

8. On May 23, 2024, the Debtors filed their schedules of assets and liabilities (the “Schedules”) and statement of financial affairs (the “Statement,” and together with the Schedules, the “Schedules and Statements”) [D.I. 108 through 147].

9. On November 13, 2024, the Bankruptcy Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming Subchapter V Debtors’ Modified First Amended Plan of Reorganization* [D.I. 398] (the “Confirmation Order”) confirming the *Subchapter V Debtors’ Modified First Amended Plan of Reorganization* [D.I. 368] (the “Plan”).

10. On November 29, 2024, (the “Effective Date”), the Effective Date occurred. *See Notice of Effective Date* [D.I. 431].

11. Under Article 2.3 of the Plan, the Reorganized Debtors may object to the amount or validity of any Claim within 180 days of the Confirmation Date. The Claims Objection Deadline is currently May 12, 2025.

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<sup>2</sup> On June 11, 2024, KCC changed its name to KCC dba Verita Global (“Verita”). There has not been any change in the company’s ownership structure.

### **CLAIMS RECONCILIATION PROCESS**

12. The Claims Register reflects that as of the date of this Motion, 121 proofs of claim of varying priority levels, including general unsecured, secured, priority and administrative claims (collectively, the “Filed Claims”), have been filed in these chapter 11 cases. In addition, 31 claims were listed in the Debtors’ Schedules and Statements (collectively, the “Scheduled Claims”).

13. On February 10, 2025, the Reorganized Debtors filed the *Motion of Reorganized Debtors to Convert the Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* [D.I. 481], which has been adjourned pending the outcome of a forthcoming motion to modify the Plan which the Debtors expect to soon file.

14. On April 3, 2025, the Debtors filed 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* (the “LOI Motion”) [D.I. 545]. On April 30, 2025, the Court entered the *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* (the “LOI Order”) [D.I. 585].

15. The Reorganized Debtors respectfully request entry of an order extending the Claims Objection Deadline for a period of approximately 120 days through and including September 9, 2025.<sup>3</sup> The proposed extension is without prejudice to the rights of the Reorganized Debtors to seek additional extensions for the Claims Objection Deadline, as appropriate.

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<sup>3</sup> Pursuant to Local Rule 9006-2, the filing of this Motion prior to the expiration of the current Claims Objection Deadline serves to automatically extend the Claims Objection Deadline until such time as the Court rules on this Motion. *See* Del. Bankr. L.R. 9006-2

**BASIS FOR RELIEF**

16. Section 105(a) of the Bankruptcy Code provides that the Court may “issue any order . . . necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a).

Moreover, Bankruptcy Rule 9006(b) provides, in relevant part:

[W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may . . . order the period enlarged. . .

Fed. R. Bankr.P. 9006(b).

17. Cause exists to extend the Claims Objection Deadline as requested herein because the Claims are still under review by the Reorganized Debtors.

18. The Reorganized Debtors’ review and reconciliation process continues, and additional significant claims are likely to be filed in these cases (based upon anticipated contract and leases rejections), and the Reorganized Debtors may wish to pursue potential objections to Claims in the future, depending upon the outcome of the Harker Palmer LOI and related proposed modified Plan that the Debtors anticipate soon filing in these cases.

19. Consequently, and in light of the various tasks of the Reorganized Debtors that have been, and continue to be, conducted concurrently in these cases, the Reorganized Debtors request additional time to engage in a process of further review, reconciliation, and settlement discussions to address Claims filed in these cases.

20. Accordingly, the Reorganized Debtors request an extension of the Claims Objection Deadline from May 12, 2025 to September 9, 2025.

**NOTICE**

21. The Reorganized Debtors will serve copies of the Motion on: (i) the Office of the United States Trustee for the District of Delaware; (ii) the Subchapter V Trustee; (iii) each of the

Debtor's twenty (20) largest unsecured creditors; and (iv) all parties who have requested notice pursuant to Bankruptcy Rule 2002 and Local Rule 2002-1(b).

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Proposed Order: (a) granting the Motion; (b) extending the deadline by which the Reorganized Debtors may file any objections to Claims through and including September 9, 2025, without prejudice to the Reorganized Debtors' rights to seek further extensions of such deadlines; and (c) granting such other relief as the Court deems just and proper.

Dated: May 8, 2025  
Wilmington, Delaware

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

/s/ John W. Weiss

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**EXHIBIT A**

**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)

Re: D.I. \_\_\_\_

**ORDER EXTENDING DEADLINE TO OBJECT TO CLAIMS**

Upon consideration of the *Motion to Extend Deadline to Object to Claims* (the Motion)<sup>2</sup>, and it appearing that good cause exists to grant the relief requested by the Motion, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The time period to file and serve objections to Claims in these cases (the "Claims Objection Deadline") is extended through and including September 9, 2025, without prejudice to the rights of the Reorganized Debtors to request further extensions of the Claims Objection Deadline.
3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

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



4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.