

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

<i>In re</i>	:	Chapter 11 (Subchapter V)
STICKY’S HOLDINGS, LLC, <i>et al.</i> , ¹	:	Case No. 24-10856 (JKS)
	:	(Jointly Administered)
Debtors.	:	Ref. Docket No. 646
	:	

**MOTION TO SHORTEN THE NOTICE PERIOD FOR CONSIDERATION OF, AND TO
LIMIT NOTICE REGARDING, THE UNITED STATES TRUSTEE’S MOTION FOR
ENTRY OF AN ORDER CONVERTING THE CASES TO CHAPTER 7 CASES**

In support of his motion to shorten the notice period for consideration of, and to limit notice regarding (“Motion to Shorten/Limit”), the *United States Trustee’s Motion for Entry of an Order Converting the Cases to Chapter 7 Cases* (the “Motion”), Andrew R. Vara, United States Trustee for Regions Three and Nine (the “U.S. Trustee”), by and through his counsel, avers:

1. Concurrently herewith, the U.S. Trustee has filed the Motion.² The grounds for the Motion include that (i) the Debtors’ estates are suffering continuing losses and there is no reasonable likelihood of rehabilitation and (ii) the cases are administratively insolvent. In the Motion, the U.S. Trustee avers that it is in the best interests of these estates, their creditors and equity security holders to convert the cases to cases under chapter 7 for the purpose of allowing an

¹ 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.

² Terms not otherwise defined in the Motion to Shorten shall have the same meaning as in the Conversion Motion.



independent fiduciary to monetize the Debtors' assets and, if necessary, pursue Debtors' causes of action, rather than having the assets of the estates dissipate as the result of Debtors' failure to move forward with these chapter 11 cases.

3. A decision by this Court to hear the Motion on the July 10, 2025 hearing date promotes judicial economy. The U.S. Trustee submits that the time to object should be shortened because the Debtors have failed to make any progress toward resolving the issues raised by the Court in its June 9, 2025 bench ruling on the Motion to Modify Plan. Further, the Debtors concede that the estates are administratively insolvent and they are unable to reorganize. Mot. ¶¶ 8, 16.

4. Therefore, the U.S. Trustee requests that this Court shorten notice pursuant to Local Bankruptcy Rule 9006-1(e) and set a hearing date for the Motion for July 10, 2025 at 11:00 a.m. ET (the next scheduled omnibus hearing date and date noticed for Debtors' counsel's Motion to Withdraw) with an objection deadline (i) for oral objections, at the time of hearing for the Motion and (ii) for written objections, 12 noon ET on July 9, 2025.

6. The U.S. Trustee has conferred with the Debtors, the Subchapter V trustee and counsel to Harker Palmer the Committee regarding the relief requested in this Motion to Shorten pursuant to Local Rule 9006-1(e). Counsel to the Debtors, Harker Palmer and the subchapter V trustee do not object to the U.S. Trustee's request.

WHEREFORE, the U.S. Trustee requests that this Court shorten notice of the Motion as provided herein. A proposed form of order granting the Motion to Shorten is attached.

Dated: June 30, 2025
Wilmington, Delaware

Respectfully submitted,

ANDREW R. VARA
UNITED STATES TRUSTEE
REGIONS 3 & 9

By: /s/ Jonathan W. Lipshie
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<i>In re</i> STICKY’S HOLDINGS, LLC, <i>et al.</i> , ¹ Debtors.	: : : : : : : : :	Chapter 11 (Subchapter V) Case No. 24-10856 (JKS) (Jointly Administered) Re: D.I. _____
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**ORDER SHORTENING THE NOTICE PERIOD FOR CONSIDERATION OF, THE
UNITED STATES TRUSTEE’S MOTION FOR ENTRY OF AN ORDER CONVERTING,
THE CASES TO CHAPTER 7 CASES**

Upon consideration of the United States Trustee’s *Motion for Entry of an Order Shortening the Notice Period for Consideration of the United States Trustee’s Motion for Entry of an Order Converting the Cases to Chapter 7 Cases* (the “Motion to Shorten”) and all pleadings related thereto; and having determined that no other or further notice of the Motion to Shorten is required under the circumstances; and having determined that the Court has jurisdiction to consider the Motion to Shorten in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and having determined that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and having determined that venue of this proceeding and the Motion to Shorten is proper pursuant to 28 U.S.C. §§ 1408 and 1409, and after due deliberation and sufficient cause therefor;

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IT IS HEREBY ORDERED THAT:

1. The Motion to Shorten is GRANTED as set forth herein.
2. The hearing to consider the entry of an order converting these cases to cases under Chapter 7 on the U.S. Trustee's Motion will be held on **July 10, 2025, at 11:00 am (ET)**. Objections to the Motion, if any, may be made orally at the time of the hearing or, alternatively, in writing by 12 noon on July 9, 2025.
3. The Court shall retain jurisdiction over any and all matters arising from, or related to, the interpretation and/or implementation of this Order.

CERTIFICATE OF SERVICE

I, Jonathan W. Lipshie, counsel to Andrew R. Vara, the United States Trustee for Region 3, do hereby certify that on this 30th day of June, 2025, I caused a true and correct copy of the *Motion to Shorten the Notice Period for Consideration of, and to Limit Notice Regarding, the United States Trustee's Motion for Entry of an Order Converting the Cases to Chapter 7 Cases* through the CM/ECF notification system by Electronic Mail and to be served on the parties listed below in the manner indicated.

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By: /s/ Jonathan W. Lipshie
Jonathan W. Lipshie
Trial Attorney