IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
Sticky's Holdings LLC	C, et al., ¹)	Case No. 24-10856 (JKS)
	Reorganized Debtors.)	(Jointly Administered)

REQUEST OF SRI-WSA PROPERTIES I, LLC FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. §§ 365(d)(3), 503(a), 503(b)(1)(A), AND 503(b)(7)

SRI-WSA Properties I, LLC (the "<u>Landlord</u>"), by and through its undersigned counsel, pursuant to sections 365(d)(3) and 503(b) of title 11 of the United States Code, respectfully files this Request (the "<u>Request</u>") for an order granting the allowance and payment of Landlord's administrative expense claim in the amount set forth herein. In support of this Request, Landlord states as follows:

I. <u>BACKGROUND</u>

1. On March 25, 2024 (the "Petition Date"), the Reorganized Debtors each filed a voluntary petition for relief under subchapter V of chapter 11 of title 11 of the United States Code with the United States Bankruptcy Court for the District of Delaware (the "Court"), which cases have been jointly consolidated for administrative purposes only (the "Chapter 11 Cases"). The Reorganized Debtors continue to operate their businesses and manage their properties as debtors and debtors-in-possession pursuant to 11 U.S.C. §§ 1107(a) and 1108.

² Unless otherwise specified, all statutory references to "Section" are to 11 U.S.C. §§ 101 et seq. (the "<u>Bankruptcy Code</u>").



¹ The Reorganized 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); Sticky Corporate LLC (5719); and Sticky's IP LLC (4569). The Reorganized Debtors' mailing address is 21 Maiden Lane, New York, NY 10038.

- 2. On April 26, 2024, the United States Trustee appointed Natasha Songonuga as the subchapter V trustee in these Chapter 11 Cases.
- 3. The Debtor Sticky's NJ IV, LLC ("Tenant") leases retail space (the "Premises") from the Landlord pursuant to an unexpired lease of nonresidential real property (the "Lease") for its restaurant operations (No. 112) located in The Social in Hoboken, New Jersey. To secure payment of its obligations under the Lease, the Tenant provided Landlord with a security deposit in the amount of \$23,333.34. A true and correct copy of the Lease is available upon request.
- 4. The Lease is a lease "of real property in a shopping center" as that term is used in Section 365(b)(3). See In re Joshua Slocum, Ltd., 922 F.2d 1081, 1086-87 (3d Cir. 1990).
- 5. On October 21, 2024, the Reorganized Debtors filed the *Subchapter V Debtor's Modified First Amended Plan of Reorganization* [D.I. 368] (the "<u>Plan</u>"), which contemplated assumption of the Lease.
- 6. On November 13, 2024, the Bankruptcy Court confirmed the Plan pursuant to 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"). The Plan went effective on November 29, 2024 (the "Effective Date"), and the Lease was assumed (the "Assumed Lease"). *See* D.I. 431.
- 7. Post-confirmation, the Tenant defaulted on its obligations under the Assumed Lease. Among other things, Reorganized Debtors failed to pay base rent and additional rent due for February, April, May and June, 2025, as more fully set forth herein and in **Exhibit 1** attached hereto.
- 8. Thereafter, on June 26, 2025, the Court entered the Order Authorizing Reorganized Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Rejection of

Certain Unexpired Leases, Equipment Leases, and Executory Contracts; (II) Authorizing the Abandonment of Certain Personal Property; and (III) Granting Related Relief [D.I. 642] (the "Rejection Order"), pursuant to which the Lease was rejected effective June 26, 2025 (the "Rejection Date").

- 9. The Rejection Order established the deadline for filing any claim in relation to the Lease as ten (10) days from the entry of the Rejection Order.
- 10. Under the terms of the Lease, the Reorganized Debtors are required to make certain payments to the Landlord arising out of their use and occupancy of the Premises. These payments include such items as rent and related charges, common area maintenance obligations, real property taxes, and all other charges imposed by the Lease, including year-end adjustments and reconciliations for charges that the Reorganized Debtors pay on an estimated basis. The Reorganized Debtors have not paid all obligations that have arisen or accrued during the post-Effective Date, post-petition period prior to the Rejection Date, Further, pursuant to Section 503(b)(7) of the Bankruptcy Code, the Landlord is entitled to a sum equal to all monetary obligations due, for the period of two (2) years following the Rejection Date. Accordingly, the Landlord is entitled to a priority administrative expense claim for such obligations, as set forth in greater detail in the chart below and on the attached Exhibit 1, in addition to any indemnity obligations, amounts subject to setoff and/or recoupment, and/or attorneys' fees.

SRI-WSA Properties I, LLC					
Store No.	Shopping Center	City, State	Administrative Claim Amount		
112	The Social	Hoboken, NJ	\$380,976.05		

II. RELIEF REQUESTED

11. Landlord respectfully requests that the Court enter an order for allowance and payment of its administrative priority claim in the amount set forth herein, pursuant to Bankruptcy Code sections 365(d)(3), 503(a), 503(b)(7), 503(b)(1)(A), and 507(a)(2).

III. BASIS FOR THE RELIEF REQUESTED

- 12. Section 365(d)(3) provides that a debtor is required to "timely perform all the obligations of the debtor . . . arising from and after the order for relief under any unexpired lease of nonresidential real property, until such lease is assumed or rejected" 11 U.S.C. § 365(d)(3). See, e.g., Imperial Beverage Group, LLC, 457 B.R. 490, 497-500 (Bankr. N.D. Tex. 2011); In re Appletree Markets, Inc., 139 B.R. 417, 419-20 (Bankr. S.D. Tex. 1992). See also In re Simbaki, Ltd., Case No. 13-36878, 2015 BL 97167, *6 (Bankr. S.D. Tex. Apr. 6, 2015).
- The majority of courts that have considered the operation of Section 365(d)(3) have arrived at the same conclusion: costs and expenses incurred for post-petition, preassumption or rejection performance under an unexpired nonresidential real estate lease must be allowed as an administrative expense regardless of Section 503(b)(1)(A) limitations. *Id. See also In re Liberty Outdoors, Inc.*, 205 B.R. 414, 417 (Bankr. E.D. Mo. 1997) (lessor entitled to recover unpaid expenses pursuant to section 365(d)(3) of the Bankruptcy Code regardless of whether such "expenses benefited or preserved the estate"); *In re Worths Stores Corp.*, 135 B.R. 112, 115 (Bankr. E.D. Mo. 1991) (same); *In re S. Lincoln Med. Grp., P.C.*, Case No. BK07-41636-TLS, 2008 WL 506086, at *2 (Bankr. D. Neb. Feb. 21, 2008) (citing *In re Brewer*, 233 B.R. 825, 829 (Bankr. E.D. Ark. 1999). Thus, the plain language of Section 365(d)(3) and the relevant case law clearly requires the Reorganized Debtors' immediate payment of all rents and related charges that arise post-petition as administrative expenses of these estates.
- 14. In addition, Section 503(b)(1) provides for an administrative expense claim for "the actual, necessary costs and expenses of preserving the estate. See 11 U.S.C.

- § 503(b)(1). A landlord's administrative claim under Section 503(b)(1) is equal to the lease contract rate. *In re ZB Co., Inc.*, 302 B.R. 316, 319 (Bankr. D. Del. 2003) (contract rate is presumed to be the fair rental value.). Section 507(a) of the Bankruptcy Code provides that administrative expense claims that are allowed under section 503(b) of the Bankruptcy Code have first priority. *See* 11 U.S.C. § 507(a)(2). The Reorganized Debtors benefited from the postpetition use and occupancy of the Premises through the Rejection Date.
- 15. Furthermore, Section 503(b)(7) provides that where a lease is assumed and subsequently rejected, the Landlord shall receive "sum equal to all monetary obligations due, excluding those arising from or relating to a failure to operate or a penalty provision, for the period of 2 years following the later of the rejection date or the date of actual turnover of the premises, without reduction or setoff for any reason whatsoever except for sums actually received or to be received from an entity other than the debtor, and the claim for remaining sums due for the balance of the term of the lease shall be a claim under section 502(b)(6)."
- 16. On the basis of the foregoing, Landlord respectfully requests that the Court enter an order allowing its administrative expense claim in the amount set forth herein and in the accompanying supporting exhibit.

NO PRIOR REQUEST

17. Landlord submits that no prior request for the relief requested herein has been made to this Court or any other Court.

NOTICE

18. Service of this Request will be made upon the Debtors, counsel to the Reorganized Debtors, the Subchapter V Trustee and the United States Trustee. In light of the relief requested, Landlord submits that no other or further notice is required.

WHEREFORE, Landlord respectfully requests that the Court enter an Order: (i) awarding the allowance and payment of the Landlord's administrative expense claims against the Reorganized Debtors' estates under sections 365(d)(3), 503(a), 503(b)(1)(A), and 503(b)(7) of the Bankruptcy Code in the amount set forth herein; and (ii) providing for such other relief as the Court deems just and necessary.

Dated: July 7, 2025 Wilmington, Delaware Respectfully submitted,

/s/Leslie C. Heilman

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Counsel to SRI-WSA Properties I, LLC

EXHIBIT 1

Case 24-10856-JKS Doc 666-1 Filed 07/07/25 Page 2 of 6

Landlord: SRI-WSA Properties I, LLC

Tenant: Sticky's NJ IV LLC

Premises: 112 Washington Street, Hoboken, NJ 07030 (Store # 112)

Lease Expiration: April 13, 2031
Lease Rejection Date: June 26, 2025
Petition Date: April 25, 2024
Security Deposit: \$23,333.34

Section 503(b)(7) Rejection, Post-Assumption Claim:

Period	Monthly Base Rent	Real Estate Taxes	Water & Sewer	Total Monthly Rent	# of months remaining	Total Annual Rent
7/1/25-6/30/27	\$ 13,820.33	\$ 260.00	\$ 360.00	\$ 14,440.33	24	\$ 346,567.92
						\$ 346,567.92

TOTAL UNPAID RENT & OTHER CHARGES DUE	\$ 57,741.47
Arrearages per attached statement	
Unpaid Rents through June 30, 2025	
Less Security Deposit	(\$23,333.34)
TOTAL 503(b)(7) Damages	\$ 346,567.92
TOTAL ADIMINSITRATIVE CLAIM	\$ 380,976.05
1-YEAR REJECTION DAMAGES PER SECTION 502(B)(6)	\$ 173,283.96
TOTAL PREPETITION CLAIM	\$ 173,283.96

Resident Ledger



Code	t0000961	Property	5003112	Lease From	
Name	Jonathan Sherman Stickys NJ IV LLC	Unit	STORE	Lease To	
Address	112 Washington Street	Status	Current	Move In	04/13/2021
		Rent	13820.33	Move Out	
City	Hoboken, NJ 07030	Phone (H)		Phone (W)	

Data	Chg Code	Description	Chargo	Daymont	Palanco	Cha/Doc
Date 04/27/2021	secdep	Description Security Deposit	Charge 23,333.34	Payment	Balance 23,333.34	Chg/Rec 119776
05/06/2021	secdep	chk# 99999	23,333.34	23,333.34		
01/01/2022	ront	Base Rent (01/2022) 18 days	4 774 20	23,333.34	0.00 6,774.20	<u>108454</u> <u>128122</u>
01/01/2022	rent	chk# 4125201	6,774.20	6,774.20	0.00	116109
02/01/2022	ront	Base Rent (02/2022)	11 666 67	0,774.20	11,666.67	129330
02/01/2022	rent	chk# 4224355	11,666.67	11 444 47	0.00	117175
03/01/2022	rent	Base Rent (03/2022)	11,666.67	11,666.67	11,666.67	130240
03/01/2022	тепі	chk# 4359973	11,000.07	11 444 47	0.00	<u>130240</u> <u>118049</u>
04/01/2022	ront			11,666.67	11,666.67	131043
04/05/2022	rent	Base Rent (04/2022) chk# 4496466	11,666.67	11,666.67	0.00	<u>131043</u> <u>118847</u>
04/03/2022	trash	3/27/22 refuse on property	250.00	11,000.07	250.00	131765
05/01/2022	rent	Base Rent (05/2022)	12,833.33		13,083.33	132312
05/02/2022	Tent	chk# 4628750	12,033.33	250.00	12,833.33	119509
05/06/2022		chk# 4653474		11,666.67	1,166.66	119789
05/06/2022	water	May 2022 - Water charges	357.00	11,000.07	1,523.66	132779
05/12/2022	water	chk# 4711405	337.00	1,166.66	357.00	119910
05/31/2022		chk# 4801978		12,833.33		120291
06/01/2022	rent	Base Rent (06/2022)	12,833.33	12,033.33	357.00	133334
06/01/2022		Water & Sewer Charges (06/2022)	357.00		714.00	<u>133350</u>
06/22/2022	water	chk# 4927416	337.00	714.00	0.00	120922
07/01/2022	ront	Base Rent (07/2022)	12,833.33	714.00	12,833.33	134024
07/01/2022	rent water	Water & Sewer Charges (07/2022)	357.00		13,190.33	134040
07/06/2022	water	chk# 4970052	337.00	12,833.33	357.00	<u>134040</u> <u>121502</u>
08/01/2022	rent	Base Rent (08/2022)	12,833.33	12,033.33	13,190.33	135096
08/01/2022	water	Water & Sewer Charges (08/2022)	357.00		13,547.33	135112
08/04/2022	water	chk# 50047	337.00	12,833.33	714.00	122572
08/26/2022		chk# 50115		357.00	357.00	122969
09/01/2022	rent	Base Rent (09/2022)	12,833.33	337.00	13,190.33	136276
09/01/2022	water	Water & Sewer Charges (09/2022)	357.00		13,547.33	<u>136276</u> <u>136292</u>
09/06/2022	water	chk# 50144	337.00	13,190.33		123708
10/01/2022	rent	Base Rent (10/2022)	12,833.33	13,170.33	13,190.33	<u>137340</u>
10/01/2022	water	Water & Sewer Charges (10/2022)	357.00		13,547.33	137356
10/03/2022	water	chk# 50229	337.00	13,190.33	357.00	124625
11/01/2022	rent	Base Rent (11/2022)	12,833.33	13,170.33	13,190.33	138460
11/01/2022	water	Water & Sewer Charges (11/2022)	357.00		13,547.33	138475
11/14/2022	Water	chk# 50351	307.00	13,190.33		126091
11/29/2022		chk# 50403			(12,833.33)	126301
12/01/2022	rent	Base Rent (12/2022)	12,833.33	10,170.00	0.00	140041
12/01/2022	water	Water & Sewer Charges (12/2022)	357.00		357.00	140057
01/01/2023	rent	Base Rent (01/2023)	12,833.33		13,190.33	141107
01/01/2023		Water & Sewer Charges (01/2023)	357.00		13,547.33	141123
01/04/2023	vvatol	chk# 50488	337.00	13,190.33	357.00	<u>128118</u>
01/19/2023	other			10,170.00	884.79	141662
02/01/2023	rent	Base Rent (02/2023)	12,833.33		13,718.12	142275
02/01/2023	water	Water & Sewer Charges (02/2023)	357.00		14,075.12	142291
02/08/2023	Water	chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services NSFed by ctrl# 129531 Returned:	337.00	13,547.33	527.79	129506
		Corporate Customer Advises Not Authorized				

02/09/2023		chk#:ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(roo ெக்.ஐ. ஃச். 1 R. இத்தொய்க S ices D. ஏ. செ. மி. மி. இத்தி இதிற்ற 12 95 மி. இதிற்ற 12 95 	Page 4	of 6 _{527.79}	0.00	<u>129511</u>
02/13/2023	nsf	Returned check charge	25.00		25.00	142920
02/13/2023	nsf	Returned check charge	25.00		50.00	<u>142921</u>
02/13/2023		chk# :ACH-WEB NSF receipt Ctrl# 129506		(13,547.33)	13,597.33	<u>129531</u>
02/13/2023		chk# :ACH-WEB NSF receipt Ctrl# 129511		(527.79)	14,125.12	<u>129532</u>
02/13/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		14,125.12	0.00	<u>129536</u>
02/28/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		13,190.33	(13,190.33)	<u>129950</u>
03/01/2023	rent	Base Rent (03/2023)	12,833.33		(357.00)	<u>143510</u>
03/01/2023	water	Water & Sewer Charges (03/2023)	357.00		0.00	<u>143526</u>
03/23/2023	PYTU	2022 Tax & Water True-up	2,633.24		2,633.24	<u>144288</u>
03/29/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		13,353.33	(10,720.09)	130969
04/01/2023	rent	Base Rent (04/2023)	12,833.33		2,113.24	<u>144869</u>
04/01/2023	retax	Real Estate Taxes (04/2023)	110.00		2,223.24	<u>144884</u>
04/01/2023	water	Water & Sewer Charges (04/2023)	410.00		2,633.24	<u>144885</u>
04/04/2023	trash	3/26/23 refuse on property	250.00		2,883.24	<u>145501</u>
04/13/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		2,633.24	250.00	<u>131896</u>
05/01/2023	rent	Base Rent (05/2023)	13,154.17		13,404.17	<u>146227</u>
05/01/2023	retax	Real Estate Taxes (05/2023)	110.00		13,514.17	<u>146244</u>
05/01/2023	water	Water & Sewer Charges (05/2023)	410.00		13,924.17	<u>146245</u>
05/04/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		13,674.17	250.00	<u>132782</u>
06/01/2023	rent	Base Rent (06/2023)	13,154.17		13,404.17	<u>147503</u>
06/01/2023	retax	Real Estate Taxes (06/2023)	110.00		13,514.17	<u>147520</u>
06/01/2023	water	Water & Sewer Charges (06/2023)	410.00		13,924.17	<u>147521</u>
06/01/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		13,674.17	250.00	<u>133672</u>
06/30/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		13,674.17	(13,424.17)	<u>134539</u>
07/01/2023	rent	Base Rent (07/2023)	13,154.17		(270.00)	<u>148395</u>
07/01/2023	retax	Real Estate Taxes (07/2023)	110.00		(160.00)	<u>148412</u>
07/01/2023	water	Water & Sewer Charges (07/2023)	410.00		250.00	<u>148413</u>
07/31/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		13,674.17	(13,424.17)	<u>135805</u>
08/01/2023	rent	Base Rent (08/2023)	13,154.17		(270.00)	<u>150484</u>
08/01/2023	retax	Real Estate Taxes (08/2023)	110.00		(160.00)	<u>150501</u>
08/01/2023	water	Water & Sewer Charges (08/2023)	410.00		250.00	<u>150502</u>
09/01/2023	rent	Base Rent (09/2023)	13,154.17		13,404.17	<u>151883</u>
09/01/2023	retax	Real Estate Taxes (09/2023)	110.00		13,514.17	<u>151900</u>
09/01/2023	water	Water & Sewer Charges (09/2023)	410.00		13,924.17	<u>151901</u>
09/06/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		13,674.17	250.00	<u>137631</u>
09/29/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		13,674.17	(13,424.17)	<u>138125</u>
10/01/2023	rent	Base Rent (10/2023)	13,154.17		(270.00)	<u>152847</u>
10/01/2023	retax	Real Estate Taxes (10/2023)	110.00		(160.00)	<u>152864</u>
10/01/2023	water	Water & Sewer Charges (10/2023)	410.00		250.00	<u>152865</u>
11/01/2023	rent	Base Rent (11/2023)	13,154.17		13,404.17	<u>154470</u>
11/01/2023	retax	Real Estate Taxes (11/2023)	110.00		13,514.17	<u>154487</u>
11/01/2023	water	Water & Sewer Charges (11/2023)	410.00		13,924.17	<u>154488</u>
11/03/2023		chk# :ACH-WEB Online Payment - EFT Payment Paid by Roommate Leor _(r0001132).Web - Resident Services		13,924.17	0.00	<u>139923</u>
12/01/2023	rent	Base Rent (12/2023)	13,154.17		13,154.17	<u>156055</u>
12/01/2023	retax	Real Estate Taxes (12/2023)	110.00		13,264.17	<u>156072</u>
12/01/2023	water	Water & Sewer Charges (12/2023)	410.00		13,674.17	<u>156073</u>
12/12/2023	late	late fee	683.70		14,357.87	<u>156541</u>
12/14/2023		chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services	1	13,674.17	683.70	<u>141311</u>
01/01/2024	rent	Base Rent (01/2024)	13,154.17		13,837.87	<u>157363</u>
01/01/2024	retax	Real Estate Taxes (01/2024)	110.00		13,947.87	<u>157380</u>

01/01/2024	water	Water & Sewer Charges (01/2024)	410.00		14,357.87	<u>157381</u>
01/08/2024	trash	12/15/23 cardibate out at wrong time	Page 5	OT 6	14,607.87	<u>157943</u>
01/08/2024	trash	12/15/23 trash out at wrong time	250.00		14,857.87	<u>157944</u>
01/09/2024		chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services		13,674.17	1,183.70	<u>142337</u>
02/01/2024	rent	Base Rent (02/2024)	13,154.17		14,337.87	<u>158630</u>
02/01/2024	retax	Real Estate Taxes (02/2024)	110.00		14,447.87	<u>158647</u>
02/01/2024	water	Water & Sewer Charges (02/2024)	410.00		14,857.87	<u>158648</u>
02/01/2024		chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services		13,674.17	1,183.70	<u>142988</u>
02/08/2024		chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services		1,183.70	0.00	<u>143382</u>
03/01/2024	rent	Base Rent (03/2024)	13,154.17		13,154.17	<u>159821</u>
03/01/2024	retax	Real Estate Taxes (03/2024)	110.00		13,264.17	<u>159838</u>
03/01/2024	water	Water & Sewer Charges (03/2024)	410.00		13,674.17	<u>159839</u>
03/05/2024	DVTII	chk#:ACH-WEB Online Payment - EFT Payment. Web - Resident Services	404.00	13,674.17	0.00	144188
03/21/2024	PYTU	2023 Tax & Water True-up	431.00		431.00	<u>160781</u>
04/01/2024	rent	Base Rent (04/2024)	13,154.17		13,585.17	<u>161107</u>
04/01/2024	retax	Real Estate Taxes (04/2024) Water & Sewer Charges (04/2024)	170.00 420.00		13,755.17 14,175.17	<u>161124</u> 161125
04/01/2024	water	chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services	420.00	14,175.17	0.00	145047
05/01/2024	rent	Base Rent (05/2024)	13,483.17	14,173.17	13,483.17	<u>163106</u>
05/01/2024	retax	Real Estate Taxes (05/2024)	170.00		13,463.17	163119
05/01/2024		Water & Sewer Charges (05/2024)	420.00		14,073.17	163119
05/01/2024	water	chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services	420.00	14,073.17	0.00	146347
05/05/2024	other	All American Sewer Service Inc Inv # S91106	1,195.52	14,073.17	1,195.52	163730
05/16/2024	other	All American Sewer Service Inc Inv # S91012	551.78		1,747.30	<u>163730</u>
05/30/2024	Otrici	chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services	331.70	15 820 47	(14,073.17)	147007
06/01/2024	rent	Base Rent (06/2024)	13,483.17	10,020.17	(590.00)	164122
06/01/2024	retax	Real Estate Taxes (06/2024)	170.00		(420.00)	164138
06/01/2024	water	Water & Sewer Charges (06/2024)	420.00		0.00	164139
06/17/2024	legal	Ballard Spahr inv# 20240506423	1,916.50		1,916.50	165387
06/17/2024	legal	Ballard Spahr Invoice Reversal	(1,916.50)		0.00	165393
07/01/2024	rent	Base Rent (07/2024)	13,483.17		13,483.17	166413
07/01/2024	retax	Real Estate Taxes (07/2024)	170.00		13,653.17	166429
07/01/2024	water	Water & Sewer Charges (07/2024)	420.00		14,073.17	<u>166430</u>
07/03/2024		chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services		14,073.17	0.00	148888
08/01/2024	rent	Base Rent (08/2024)	13,483.17		13,483.17	<u>168426</u>
08/01/2024	retax	Real Estate Taxes (08/2024)	170.00		13,653.17	<u>168442</u>
08/01/2024	water	Water & Sewer Charges (08/2024)	420.00		14,073.17	<u>168443</u>
08/01/2024		chk#:ACH-WEB Online Payment - EFT Payment. Web - Resident Services		14,073.17	0.00	<u>150249</u>
08/30/2024		chk#:ACH-WEB Online Payment - EFT Payment. Web - Resident Services		14,073.17	(14,073.17)	<u>151714</u>
09/01/2024	rent	Base Rent (09/2024)	13,483.17		(590.00)	<u>170788</u>
09/01/2024	retax	Real Estate Taxes (09/2024)	170.00		(420.00)	<u>170804</u>
09/01/2024	water	Water & Sewer Charges (09/2024)	420.00	44.070.47	0.00	<u>170805</u>
09/30/2024		chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services	10 400 17	14,073.17	(14,073.17)	<u>153253</u>
10/01/2024	rent	Base Rent (10/2024)	13,483.17 170.00		(590.00)	172417
10/01/2024	retax	Real Estate Taxes (10/2024) Water & Sewer Charges (10/2024)	420.00		(420.00) 0.00	<u>172433</u> 172434
10/01/2024	water	chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services	420.00	14,073.17	(14,073.17)	<u>172434</u> <u>154384</u>
11/01/2024	rent	Base Rent (11/2024)	13,483.17	17,073.17	(590.00)	174635
11/01/2024	retax	Real Estate Taxes (11/2024)	170.00		(420.00)	174651
11/01/2024	water	Water & Sewer Charges (11/2024)	420.00		0.00	174652
12/01/2024	rent	Base Rent (12/2024)	13,483.17		13,483.17	<u>177416</u>
12/01/2024	retax	Real Estate Taxes (12/2024)	170.00		13,653.17	177432
12/01/2024	water	Water & Sewer Charges (12/2024)	420.00		14,073.17	177433
12/02/2024		chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services		14,073.17	0.00	156317
01/01/2025	rent	Base Rent (01/2025)	13,483.17		13,483.17	179417
01/01/2025	retax	Real Estate Taxes (01/2025)	170.00		13,653.17	<u>179433</u>
01/01/2025	water	Water & Sewer Charges (01/2025)	420.00		14,073.17	<u>179434</u>
01/06/2025	late	late fee	703.65		14,776.82	<u>180347</u>
01/06/2025		chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services		14,776.82	0.00	<u>157867</u>
02/01/2025	rent	Base Rent (02/2025)	13,483.17		13,483.17	<u>182199</u>
02/01/2025	retax	Real Estate Taxes (02/2025)	170.00		13,653.17	<u>182215</u>
02/01/2025	water	Water & Sewer Charges (02/2025)	420.00		14,073.17	<u>182216</u>

02/06/2025	late	late fee	703.65		14,776.82	<u>182715</u>
02/24/2025	PYTU	2024Gase _u 24-10856-JKS Doc 666-1 Filed 07/07/25	Page 18)	of 6	14,757.64	<u>183732</u>
03/01/2025	rent	Base Rent (03/2025)	13,483.17		28,240.81	184940
03/01/2025	retax	Real Estate Taxes (03/2025)	260.00		28,500.81	<u>184956</u>
03/01/2025	water	Water & Sewer Charges (03/2025)	360.00		28,860.81	<u>184957</u>
04/01/2025	rent	Base Rent (04/2025)	13,483.17		42,343.98	<u>186922</u>
04/01/2025	retax	Real Estate Taxes (04/2025)			42,603.98	<u>186938</u>
04/01/2025	water	Water & Sewer Charges (04/2025)			42,963.98	<u>186939</u>
05/01/2025	rent	Base Rent (05/2025)			56,784.31	<u>190042</u>
05/01/2025	retax	Real Estate Taxes (05/2025)			57,044.31	<u>190058</u>
05/01/2025	water	Water & Sewer Charges (05/2025)	360.00		57,404.31	<u>190059</u>
05/05/2025		chk# :ACH-WEB Online Payment - EFT Payment. Web - Resident Services		14,103.17	43,301.14	<u>164443</u>
06/01/2025	rent	Base Rent (06/2025)			57,121.47	<u>192160</u>
06/01/2025	retax	Real Estate Taxes (06/2025)			57,381.47	<u>192176</u>
06/01/2025	water	Water & Sewer Charges (06/2025)	360.00		57,741.47	<u>192177</u>

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
Sticky's Holdings LL	C, et al., 1)	Case No. 24-10856 (JKS)
	Reorganized Debtors.)	(Jointly Administered)

ORDER GRANTING ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM

Upon the request (the "Request") of SRI-WSA Properties I, LLC (the "Landlord") for entry of an order (this "Order") for allowance and payment of administrative expense claim (the "Claim"), all as more fully set forth in the Request; and this Court having jurisdiction over this matter 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; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Request in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the notice of the Request was appropriate and no other notice need be provided; and this Court having reviewed the Request and determined that the legal and factual bases set forth therein establish just cause

The Reorganized 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 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.

for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

- 1. The Request is granted as set forth herein.
- 2. The Landlord is hereby granted an allowed administrative expense claim in the amount of \$380,976.05, which shall be paid by the above-captioned debtors and debtors in possession (the "Reorganized Debtors") within ten (10) business days of the entry of this Order.
- 3. Notice of the Request as provided therein shall be deemed good and sufficient notice of such Request and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.
- 4. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.
- 5. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Request.
- 6. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

CERTIFICATE OF SERVICE

I, Leslie C. Heilman, hereby certify that on this 7th day of July, 2025, I caused a true and correct copy of the foregoing pleading to be served electronically on all parties who have requested notice in these cases via CM/ECF and to the following parties, in the manner indicated:

Via First-Class Mail

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1 Maiden Lane
New York, NY 10038,
E-mail: jamie@stickys.com

Reorganized Debtors

Via First-Class Mail

Natasha Songonuga Trustee LLC P.O. Box 841 Wilmington, Delaware, 19899 E-mail: Nsongonuga@VTrusteellc.com

Counsel for Subchapter V Trustee

Via First-Class Mail

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Via First-Class Mail

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Jon.Lipshie@usdoj.gov

United States Trustee

Dated: July 7, 2025 Wilmington, Delaware

<u>/s/ Leslie C. Heilman</u>

Leslie C. Heilman (No. 4716) BALLARD SPAHR LLP