

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

In re:

Supply Source Enterprises, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11054 (BLS)

(Jointly Administered)

Re: Docket No. 206

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION
FOR ENTRY OF AN ORDER (I) SEALING CERTAIN CONFIDENTIAL
INFORMATION, AND (II) GRANTING RELATED RELIEF**

The undersigned hereby certifies as follows:

1. On July 5, 2024, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Debtors’ Motion for Entry of an Order (I) Sealing Certain Confidential Information, and (II) Granting Related Relief* [Docket No. 206] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached to the Motion as Exhibit A was a proposed form of order approving the relief requested in the Motion (the “Proposed Order”).
2. Any objections or responses to the relief requested in the Motion were to be filed by or presented at the hearing to consider the Motion (the “Hearing”) held on July 9, 2024 at 11:00 a.m. (ET) (the “Objection Deadline”).
3. Prior to the Objection Deadline, the Debtors received informal comments from the Office of the United States Trustee for the District of Delaware (“U.S. Trustee”).

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: Supply Source Enterprises, Inc. (0842); SSE Intermediate, Inc. (1772); SSE Buyer, Inc. (5901); Impact Products, LLC (7450); and The Safety Zone, LLC (4597). The Debtors’ headquarters are located at 385 Long Hill Road, Guilford, Connecticut 06437.



4. Consistent with comments made on the record at the Hearing, the Debtors and the U.S. Trustee have met and conferred regarding the scope of sealing and redactions, and have agreed to a revised form of order, which is attached hereto as **Exhibit A** (the “Revised Order”). The Revised Order has been circulated and the U.S. Trustee does not object to its entry. For the convenience of the Court and all parties in interest, a blackline of the Revised Order against the Proposed Order is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors respectfully request that the Revised Order granting the relief requested in the Motion be entered at the earliest convenience of the Court.

[Remainder of Page Intentionally Left Blank]

Dated: July 9, 2024
Wilmington, Delaware

Respectfully submitted,

/s/ Levi Akkerman

M. Blake Cleary (No. 3614)

R. Stephen McNeill (No. 5210)

Katelin A. Morales (No. 6683)

Levi Akkerman (No. 7015)

POTTER ANDERSON & CORROON LLP

1313 N. Market Street, 6th Floor

Wilmington, Delaware 19801

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Email: bcleary@potteranderson.com

rmcneill@potteranderson.com

kmorales@potteranderson.com

lakkerman@potteranderson.com

-and-

Felicia Gerber Perlman (admitted *pro hac vice*)

Bradley Thomas Giordano (admitted *pro hac vice*)

Carole M. Wurzelbacher (admitted *pro hac vice*)

McDERMOTT WILL & EMERY LLP

444 West Lake Street

Chicago, IL 60606-0029

Telephone: (312) 372-2000

Facsimile: (312) 984-7700

Email: fperlman@mwe.com

bgiordano@mwe.com

cwurzelbacher@mwe.com

Counsel to the Debtors and Debtors in Possession

EXHIBIT A

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

In re:

Supply Source Enterprises, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11054 (BLS)

(Jointly Administered)

Re: Docket Nos. 21, 166, & 206

**ORDER (I) SEALING CERTAIN CONFIDENTIAL INFORMATION,
AND (II) GRANTING RELATED RELIEF**

Upon consideration of the Debtors' Motion to Seal and the Debtors' representations at the hearing to consider the Motion to Seal seeking entry of an order (this "Order")² (i) sealing the Schedules, and (ii) granting related relief pursuant to sections 105 and 107 of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1; and upon consideration of the Motion to Seal, and all pleadings related thereto, including the Notices; and having determined that no other or further notice of the Motion to Seal is required under the circumstances; and having determined that the Court has jurisdiction to consider the Motion to Seal in accordance with 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 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 Seal is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and having determined that the relief requested in the Motion to Seal and provided for herein is in the best interest of the

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor's federal tax identification number, are: Supply Source Enterprises, Inc. (0842); SSE Intermediate, Inc. (1772); SSE Buyer, Inc. (5901); Impact Products, LLC (7450); and The Safety Zone, LLC (4597). The Debtors' headquarters are located at 385 Long Hill Road, Guilford, Connecticut 06437.

² All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion to Seal.

Debtors, their estates, and their creditors; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion to Seal is **GRANTED** as set forth herein.
2. The Debtors, in consultation with the U.S. Trustee, are authorized to seal or redact Schedule 1.1(a); Schedule 1.1(b); Disclosure Schedule 5.6; Disclosure Schedule 5.7; Disclosure Schedule 5.8; Disclosure Schedule 5.15(a); Disclosure Schedule 5.16; Disclosure Schedule 5.17; Disclosure Schedule 5.24; Disclosure Schedule 5.25; Annex 5.3(a); and Annex 5.6(b) (collectively, the “Schedules”) that were attached to the Stalking Horse APA in the Notices previously filed at Docket Numbers 21 and 166. The Clerk of the Court shall replace or modify the documents which appear at Docket Numbers 21 and 166 pursuant to the terms of this Order.
3. The Debtors shall contact and inform all third parties that may have previously acquired and/or currently possess unredacted copies of the Notices or the Schedules that such documents are now under seal and that such third parties treat the confidential information contained in the Notices and Schedules (the “Confidential Information”) as such.
4. All pleadings or filings relating to the Schedules or the Notices containing or referencing any of the Confidential Information shall be filed under seal or redacted as applicable.
5. The Court shall retain jurisdiction with respect to all matters arising from or related to this Order.

EXHIBIT B

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

In re:

Supply Source Enterprises, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11054 (BLS)

(Jointly Administered)

Re: Docket Nos. 21, 166, & ~~206~~ [206](#)

**ORDER (I) SEALING CERTAIN CONFIDENTIAL INFORMATION,
AND (II) GRANTING RELATED RELIEF**

Upon consideration of the Debtors' Motion to Seal [and the Debtors' representations at the hearing to consider the Motion to Seal](#) seeking entry of an order (this "Order")² (i) sealing the Schedules, and (ii) granting related relief pursuant to sections 105 and 107 of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1; and upon consideration of the Motion to Seal, and all pleadings related thereto, including the Notices; and having determined that no other or further notice of the Motion to Seal is required under the circumstances; and having determined that the Court has jurisdiction to consider the Motion to Seal in accordance with 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 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 Seal is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and having determined that the relief requested in the Motion to Seal and provided for herein is in the

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor's federal tax identification number, are: Supply Source Enterprises, Inc. (0842); SSE Intermediate, Inc. (1772); SSE Buyer, Inc. (5901); Impact Products, LLC (7450); and The Safety Zone, LLC (4597). The Debtors' headquarters are located at 385 Long Hill Road, Guilford, Connecticut 06437.

² All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion to Seal.

best interest of the Debtors, their estates, and their creditors; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion to Seal is **GRANTED** as set forth herein.

~~2. The Clerk of Court shall seal the Schedules that were attached to the Notices previously filed at Docket Numbers 21 and 166.~~

2. The Debtors, in consultation with the U.S. Trustee, are authorized to seal or redact Schedule 1.1(a); Schedule 1.1(b); Disclosure Schedule 5.6; Disclosure Schedule 5.7; Disclosure Schedule 5.8; Disclosure Schedule 5.15(a); Disclosure Schedule 5.16; Disclosure Schedule 5.17; Disclosure Schedule 5.24; Disclosure Schedule 5.25; Annex 5.3(a); and Annex 5.6(b) (collectively, the “Schedules”) that were attached to the Stalking Horse APA in the Notices previously filed at Docket Numbers 21 and 166. The Clerk of the Court shall replace or modify the documents which appear at Docket Numbers 21 and 166 pursuant to the terms of this Order.

3. The Debtors shall contact and inform all third parties that may have previously acquired and/or currently possess unredacted copies of the Notices or the Schedules that such documents are now under seal and that such third parties treat the confidential information contained in the Notices and Schedules (the “Confidential Information”) as such.

4. All pleadings or filings relating to the Schedules or the Notices containing or referencing any of the Confidential Information shall be filed under seal or redacted as applicable.

5. ~~4.~~The Court shall retain jurisdiction with respect to all matters arising from or related to this Order.