

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

In re:

Liquidating Supply, Inc., *et al.*,¹
Debtors.

Chapter 11

Case No. 24-11054 (BLS)

(Jointly Administered)

Objection Deadline: October 21, 2024 at 4:00 p.m. (ET)

DEBTORS' NOTICE OF SATISFACTION OF CERTAIN FULLY SATISFIED CLAIMS

**PARTIES RECEIVING THIS NOTICE SHOULD
LOCATE THEIR NAMES AND THEIR FULLY SATISFIED
CLAIM IDENTIFIED ON EXHIBIT A ATTACHED HERETO**

PLEASE TAKE NOTICE that on September 20, 2024, the above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby filed this notice (the “Notice”) with the United States Bankruptcy Court for the District of Delaware (the “Court”) identifying that certain claim (the “Fully Satisfied Claim”) filed against the Debtors’ estates that has been satisfied in full. A list with the Fully Satisfied Claim is attached hereto as **Exhibit A**. In support of this Notice, the Debtors respectfully represent as follows:

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: Liquidating Supply, Inc. (f/k/a Supply Source Enterprises, Inc.) (0842); SSE Intermediate, Inc. (1772); SSE Buyer, Inc. (5901); Liquidating Impact, LLC (f/k/a Impact Products, LLC) (7450); and Liquidating SZ, LLC (f/k/a The Safety Zone, LLC) (4597). The Debtors’ headquarters are located at 2840 Centennial Drive, Toledo, Ohio 43617.



BACKGROUND

A. General Background

1. On May 21, 2024 (the “Petition Date”), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”). These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to rule 1015(b) of the Federal Rules of Bankruptcy Procedure. *See* Docket No. 45. The Debtors are operating their business and managing their properties, as debtors in possession pursuant to sections 1107 and 1108 of title 11 of the United States Code (the “Bankruptcy Code”). On June 3, 2024, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors (the “Committee”). *See* Docket No. 82. As of the date hereof, no trustee or examiner has been appointed in these Chapter 11 Cases.

2. Additional factual background regarding the Debtors, including their business operations, their corporate and capital structure, and the events leading to the filing of these Chapter 11 Cases is set forth in the *Declaration of Thomas Studebaker in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 3] (the “First Day Declaration”), which is incorporated herein by reference.

3. The Debtors each filed their *Schedules of Assets and Liabilities and Statement of Financial Affairs* on June 18, 2024. *See* Docket Nos. 156 – 165.

4. On May 23, 2024, the Court entered the *Order Authorizing the Debtors to Employ and Retain Kurtzman Carson Consultants LLC as Claims and Noticing Agent Effective as of the Petition Date* [Docket No. 46]. As such, Kurtzman Carson Consultants LLC d/b/a Verita Global (“Verita”) is authorized to, among other things, receive, maintain, docket, and otherwise administer proofs of claim (the “Proofs of Claim”) filed in these Chapter 11 Cases.

5. On July 8, 2024, the Court entered the *Order (I) Establishing Deadlines for the Filing of Proofs of Claim and Requests for Allowance of Administrative Expense Claims, (II) Approving the Forms and Manner of Notice Thereof, and (III) Granting Related Relief* [Docket No. 210] (the “Bar Date Order”), establishing (i) August 12, 2024 at 5:00 p.m. (ET) as the last date for all creditors, other than governmental units, holding a claim against one or more of the Debtors to file and serve a written proof of claim for payment of any such claim (the “General Bar Date”); (ii) August 30, 2024 at 5:00 p.m. (ET) as the last date for all creditors that hold or wish to assert an administrative expense claim pursuant to section 503(b) of the Bankruptcy Code (the “Administrative Claim Bar Date”); and (iii) November 18, 2024 at 5:00 p.m. (ET) as the last date for all governmental units holding a claim against one or more of the Debtors to file and serve a written proof of claim for payment of any such claim (the “Governmental Bar Date,” and together with the General Bar Date and the Administrative Claim Bar Date, the “Bar Dates”). Notice of the Bar Dates was provided by first class mail and publication in accordance with the procedures in the Bar Date Order.

B. The Sale

6. As set forth in the First Day Declaration, the Debtors filed these Chapter 11 Cases to continue the process of marketing and selling substantially all of the Debtors’ assets.

7. On June 20, 2024, the Court entered the *Order (A) Approving Bidding Procedures for the Sale of Substantially All of the Debtors’ Assets, (B) Designating the Stalking Horse Bidder, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures, (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof, and (F) Granting Related Relief* [Docket No. 173] (the “Bidding Procedures Order”) whereby the Court approved, among other things, the designation of a stalking

horse bidder and the procedures to consummate a sale of substantially all of the Debtors' assets (the "Sale").

8. On July 10, 2024, the Court entered an order approving the Sale. *See* Docket No. 222. The Sale closed on July 19, 2024. *See* Docket No. 257.

CLAIM SATISFIED AFTER THE PETITION DATE

9. The Debtors have reviewed their books and records and have determined that the holder of the Fully Satisfied Claim listed on Exhibit A has been satisfied, in full, after the Petition Date, and that no further distributions are required on account of such satisfied amounts, as set forth in the column entitled "Description" on the attached Exhibit A. Specifically, the Fully Satisfied Claim is listed in the attached Exhibit A.

10. Accordingly, the Debtors intend to have Verita designate on the Claims Register in these Chapter 11 Cases that the Fully Satisfied Claim has been previously satisfied as provided for herein and on Exhibit A attached hereto. The Debtors are serving this Notice on the party holding the Fully Satisfied Claim and providing that party with an opportunity to object to the Debtors' position that such amounts have been satisfied in full.

11. ANY PARTY DISPUTING THE DEBTORS' POSITION THAT A PARTICULAR FULLY SATISFIED CLAIM HAS BEEN SATISFIED AS PROVIDED FOR HEREIN AND ON EXHIBIT A ATTACHED HERETO MUST FILE A WRITTEN RESPONSE WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, WILMINGTON, DELAWARE 19801 ON OR BEFORE OCTOBER 21, 2024 AT 4:00 P.M. (ET), AND SERVE SUCH RESPONSE ON THE UNDERSIGNED COUNSEL TO THE DEBTORS.

12. The Debtors will then make a reasonable effort to review the Fully Satisfied Claim with the claimant to determine whether any asserted amounts were, in fact, not satisfied. In the event that the parties are unable to reach a resolution, the Debtors anticipate that a hearing will be held on the matter at a date and time to be determined by the parties, subject to the Court's availability.

13. Questions concerning this Notice should be directed to the following address:

Potter Anderson & Corroon LLP
Attn: M. Blake Cleary, Esq.
R. Stephen McNeill, Esq.
Katelin A. Morales, Esq.
1313 N. Market Street, 6th Floor
Wilmington, Delaware 19801

-and-

McDermott Will & Emery
Attn: Felicia Gerber Perlman, Esq.
Bradley Thomas Giordano, Esq.
Carole M. Wurzelbacher, Esq.
444 West Lake Street
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Counsel to the Debtors

RESERVATION OF RIGHTS

14. The Debtors reserve any and all rights to amend, supplement, or otherwise modify this Notice to file additional notices of this nature and objections to claims with respect to any and all claims filed and amounts scheduled in these Chapter 11 Cases. The Debtors also reserve any and all rights, claims, and defenses with respect to the Fully Satisfied Claim, and nothing included in or omitted from this Notice is intended or should be construed as (i) an admission as to the validity of any claim, (ii) a waiver of the Debtors' rights to dispute any claim on any grounds, (iii) a promise or requirement to pay any claim, (iv) an implication or admission that any claim is of a

type referenced or defined herein or therein, (v) a waiver or limitation of any of the Debtors' rights under the Bankruptcy Code or applicable law, or (vi) a waiver of any party's rights to assert that any other party is in breach or default of any agreement.

Dated: September 20, 2024
Wilmington, Delaware

Respectfully submitted,

/s/ Katelin A. Morales

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Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Creditor	Debtor	Claim Number	Claim Amount	Priority Status	Reason
Hydro Systems Company	Impact Products, LLC	40	\$1,405.80	503(b)(9)	Claimant was paid in full on account of this claim in the ordinary course of business and 503(b)(9) related payments on June 25, 2024.