KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP

Anup Sathy, P.C. (admitted *pro hac vice*) 333 West Wolf Point Plaza Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200 anup.sathy@kirkland.com

-and-

Matthew C. Fagen, P.C. (admitted *pro hac vice*) Francis Petrie (admitted *pro hac vice*) Evan Swager (admitted *pro hac vice*) 601 Lexington Avenue New York, New York 10022

Telephone: (212) 446-4800 Facsimile: (212) 446-4900 matthew.fagen@kirkland.com francis.petrie@kirkland.com evan.swager@kirkland.com **COLE SCHOTZ P.C.**

Michael D. Sirota, Esq.
Warren A. Usatine, Esq.
Felice R. Yudkin, Esq.
Jacob S. Frumkin, Esq.
Andreas D. Milliaressis, Esq.
Court Plaza North, 25 Main Street
Hackensack, New Jersey 07601
Telephone: (201) 489-3000
msirota@coleschotz.com
wusatine@coleschotz.com
fyudkin@coleschotz.com
jfrumkin@coleschotz.com
amilliaressis@coleschotz.com

Co-Counsel to the Reorganized Debtors

Co-Counsel to the Reorganized Debtors

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:	Chapter 11
--------	------------

1 Thrasio One, Inc.

Reorganized Debtor.¹

Case No. 24-11850 (CMG)

(Formerly Jointly Administered Under Lead Case Thrasio Holdings, Inc., 24-11840)

CERTIFICATION OF NO OBJECTION REGARDING REORGANIZED DEBTORS' MOTION FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE TO OBJECT TO CLAIMS

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection, or other responsive pleading to the *Reorganized Debtors' Motion for Entry of an Order*

2411850241204000000000001

The last four digits of Reorganized Debtor Thrasio Holdings, Inc.'s tax identification number are 8327. A complete list of the Reorganized Debtors in these chapter 11 cases and each such Reorganized Debtor's tax identification number may be obtained on the website of the Reorganized Debtors' claims and noticing agent at https://www.veritaglobal.net/Thrasio. The Reorganized Debtors' service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

Case 24-11850-CMG Doc 254 Filed 12/04/24 Entered 12/04/24 16:48:28 Desc Main Document Page 2 of 3

Extending the Deadline to Object to Claims [Docket No. 249] (the "Motion"), filed on November

18, 2024. The undersigned further certifies that he has reviewed the Court's docket in this case

and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to

rule 9013-2(a)(2) of the Local Rules of the United States Bankruptcy Court for the District of New

Jersey, objections to the Motion were to be filed and served no later than December 3, 2024 (the

"Objection Deadline").

The Objection Deadline has passed, and no objections appear on the docket or were served

upon the undersigned counsel. It is hereby respectfully requested that the Order attached hereto

as **Exhibit A** be entered at the earliest convenience of the Court.

[Remainder of Page Intentionally Left Blank.]

Dated: December 4, 2024

/s/ Andreas D. Milliaressis

COLE SCHOTZ P.C.

Michael D. Sirota, Esq.
Warren A. Usatine, Esq.
Felice R. Yudkin, Esq.
Jacob S. Frumkin, Esq.
Andreas D. Milliaressis, Esq.
Court Plaza North, 25 Main Street
Hackensack, New Jersey 07601
Telephone: (201) 489-3000

Email: msirota@coleschotz.com

wusatine@coleschotz.com fyudkin@coleschotz.com jfrumkin@coleschotz.com amilliaressis@coleschotz.com

KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP

Anup Sathy, P.C. (admitted *pro hac vice*) 333 West Wolf Point Plaza Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200

anup.sathy@kirkland.com

-and-

Matthew C. Fagen, P.C. (admitted *pro hac vice*)
Francis Petrie (admitted *pro hac vice*)
Evan Swager (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
matthew.fagen@kirkland.com
francis.petrie@kirkland.com
evan.swager@kirkland.com

Co-Counsel to the Reorganized Debtors

Case 24-11850-CMG Doc 254-1 Filed 12/04/24 Entered 12/04/24 16:48:28 Desc Exhibit A - Proposed Order Page 1 of 5

EXHIBIT A

Case 24-11850-CMG Doc 254-1 Filed 12/04/24 Entered 12/04/24 16:48:28 Desc Exhibit A - Proposed Order Page 2 of 5

Caption in Compliance with D.N.J. LBR 9004-1(b)	
UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
In re:	Chapter 11
1 Thrasio One, Inc.	Case No. 24-11850 (CMG)
Reorganized Debtor. ¹	(Formerly Jointly Administered Under Lead Case Thrasio Holdings, Inc., 24- 11840)

ORDER EXTENDING THE DEADLINE TO OBJECT TO CLAIMS

The relief set forth on the following pages, numbered three (3) through four (4), is **ORDERED**.

The last four digits of Reorganized Debtor Thrasio Holdings, Inc.'s tax identification number are 8327. A complete list of the Reorganized Debtors in these chapter 11 cases and each such Reorganized Debtor's tax identification number may be obtained on the website of the Reorganized Debtors' claims and noticing agent at https://www.veritaglobal.net/Thrasio. The Reorganized Debtors' service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

Caption in Compliance with D.N.J. LBR 9004-1(b)

KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP

Anup Sathy, P.C. (admitted *pro hac vice*) 333 West Wolf Point Plaza Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200 anup.sathy@kirkland.com

-and-

Matthew C. Fagen, P.C. (admitted *pro hac vice*)
Francis Petrie (admitted *pro hac vice*)
Evan Swager (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
matthew.fagen@kirkland.com
francis.petrie@kirkland.com
evan.swager@kirkland.com

COLE SCHOTZ P.C.

Michael D. Sirota, Esq.
Warren A. Usatine, Esq.
Felice R. Yudkin, Esq.
Jacob S. Frumkin, Esq.
Andreas D. Milliaressis, Esq.
Court Plaza North, 25 Main Street
Hackensack, New Jersey 07601
Telephone: (201) 489-3000
msirota@coleschotz.com
wusatine@coleschotz.com
fyudkin@coleschotz.com
gfrumkin@coleschotz.com
amilliaressis@coleschotz.com

Co-Counsel to the Reorganized Debtors

Case 24-11850-CMG Doc 254-1 Filed 12/04/24 Entered 12/04/24 16:48:28 Desc Exhibit A - Proposed Order Page 4 of 5

(Page | 3)

Debtor: 1 THRASIO ONE, INC.

Case No. 24-11850 (CMG)

Caption of Order: ORDER EXTENDING THE DEADLINE TO OBJECT TO CLAIMS

Upon the Reorganized Debtors' Motion for Entry of an Order Extending the Deadline to Object to Claims (the "Motion"),² of the above-captioned reorganized debtors (collectively, the "Reorganized Debtors"), for entry of an order (this "Order") pursuant to the Plan, sections 502 and 105(a) of title 11 of the United States Code (the "Bankruptcy Code"), Rules 3007 and 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "Local Rules"), extending the Other Claims Objection Bar Date; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference to the Bankruptcy Court Under Title 11 of the United States District Court for the District of New Jersey, entered July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that sufficient cause exists for the relief set forth herein; and this Court having found that the Reorganized Debtors' notice of the Motion was appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"), if any; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor IT IS HEREBY **ORDERED THAT:**

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

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

Case 24-11850-CMG Doc 254-1 Filed 12/04/24 Entered 12/04/24 16:48:28 Desc

Exhibit A - Proposed Order Page 5 of 5

(Page | 4)

Debtor: 1 THRASIO ONE, INC.

Case No. 24-11850 (CMG)

Caption of Order: ORDER EXTENDING THE DEADLINE TO OBJECT TO CLAIMS

2. The Other Claims Objection Bar Date, as set forth in Article I.A., Paragraph 27(a)(ii) of the Plan, is extended to and including June 16, 2025.

3. Pursuant to the terms of the Plan, the Reorganized Debtors may further extend the Claims Objection Bar Date, as necessary and without further order of the Court, by filing a notice on the Court's docket and serving such notice on all affected parties.

- 4. This Order shall be without prejudice to the right of the Reorganized Debtors to seek further extensions of the Claims Objection Bar Date.
- 5. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.
- 6. The requirement set forth in Local Rule 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.
- 7. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.