

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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

Lorenzo Marinuzzi (admitted *pro hac vice*)
Doug Mannal (admitted *pro hac vice*)
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Counsel for the Thrasio Legacy Trust

In re:

1 Thrasio One, Inc.

Reorganized Debtor.¹

Chapter 11

Case No. 24-11850 (CMG)

¹ Formerly jointly administered under *Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG) (the “Main Case”). The last four digits of the Reorganized Debtor’s tax identification number are 4771. The Reorganized Debtor’s service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081.



**NOTICE OF THRASIO LEGACY TRUST’S MOTION
FOR ENTRY OF AN ORDER (I) APPROVING OMNIBUS
CLAIMS OBJECTION PROCEDURES; AND (II) AUTHORIZING
THE THRASIO LEGACY TRUST TO FILE SUBSTANTIVE OMNIBUS
OBJECTIONS TO CLAIMS PURSUANT TO BANKRUPTCY RULE 3007(c) AND (d)**

PLEASE TAKE NOTICE that on April 14, 2026 at 10:00 a.m. (ET), or as soon thereafter as counsel may be heard, the Thrasio Legacy Trust (the “Trust”) established in the above-captioned case, by and through undersigned counsel, shall move for the entry of an order approving omnibus claims objections procedures (the “Motion”) before the Honorable Christine M. Gravelle, United States Bankruptcy Judge, United States Bankruptcy Court for the District of New Jersey, Courtroom #3, 402 East State Street, Trenton, NJ 08608.

PLEASE TAKE FURTHER NOTICE that the Motion sets forth the relevant factual bases upon which the relief requested should be granted. A proposed order granting the relief requested in the Motion is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection, and (iii) be filed with the Clerk of the United States Bankruptcy Court in accordance with the *Order Establishing Certain Notice, Case Management, and Administrative Procedures* (the “Case Management Order”)² and shall be served in accordance with the Case Management Order, so as to be received no later than seven (7) days before the hearing date set forth above.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be decided on the papers in accordance with Local Rule 9013-3(d), and the relief requested may be granted without further notice or hearing.

² Main Case Docket No. 69.

Dated: March 6, 2026

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Chapter 11

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¹ Formerly jointly administered under *Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG) (the “Main Case”). The last four digits of the Reorganized Debtor’s tax identification number are 4771. The Reorganized Debtor’s service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081.

**THRASIO LEGACY TRUST’S MOTION FOR ENTRY
OF AN ORDER (I) APPROVING OMNIBUS CLAIMS
OBJECTION PROCEDURES; AND (II) AUTHORIZING THE
THRASIO LEGACY TRUST TO FILE SUBSTANTIVE OMNIBUS
OBJECTIONS TO CLAIMS PURSUANT TO BANKRUPTCY RULE 3007(c) and (d)**

The Thrasio Legacy Trust (the “Trust”), by and through META Advisors LLC, solely in its capacity as trustee (the “Trustee”), hereby submits this motion (the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), approving the objection procedures set forth herein and granting related relief, and respectfully represents as follows:

JURISDICTION

1. The United States Bankruptcy Court for the District of New Jersey (the “Court”) has jurisdiction over this matter under 28 U.S.C. § 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.). The Trust confirms its consent to the Court entering a final order in connection with this Objection to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. This is a core proceeding within the meaning of 28 U.S.C. §§ 157(b)(2). Venue of this chapter 11 case in this district is proper under 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are sections 105(a) and 502(a) of title 11 of the United States Code (the “Bankruptcy Code”), rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule 9013-1 of the Local Rules of the United States Bankruptcy Court District of New Jersey (the “Local Rules”).

BACKGROUND

4. On February 28, 2024 (the “Petition Date”), Thrasio Holdings, Inc. and its affiliates (the “Debtors”) commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. Such cases were jointly administered under the case captioned as *In re Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG), up until this Court entered the Final Decree (defined below). The Debtors continued to operate their businesses and manage their assets as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code until the Effective Date of the Plan (defined below).

5. On June 13, 2024, the Court entered its *Findings of Fact, Conclusions of Law, and Order Confirming the First Amended Joint Plan of Reorganization of Thrasio Holdings, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the “Confirmation Order”),² confirming the *First Amended Joint Plan of Reorganization of Thrasio Holdings, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the “Plan”).³ The Plan went effective on June 18, 2024 (the “Effective Date”).⁴

6. On August 22, 2024, the Court entered an *Order Granting Reorganized Debtors’ Motion for Final Decree Closing Certain of the Chapter 11 Cases* (the “Final Decree”) closing certain Affiliate Cases (as defined in the Final Decree), as applicable, and granted a final decree effective as of August 22, 2024.⁵ The Final Decree further established the case of 1 Thrasio

² Main Case Docket No. 1124.

³ Main Case Docket No. 1066. Capitalized terms used but not defined herein shall have the same meanings ascribed to them in the Plan.

⁴ *See Notice of (I) Entry of the Order Confirming the First Amended Joint Plan of Reorganization of Thrasio Holdings, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Further Technical Modifications) and (II) Occurrence of Effective Date* [Main Case Docket No. 1143] (the “Effective Date Notice”).

⁵ Main Case Docket No. 1983.

One, Inc., Case No. 24-11850 as the “Remaining Case,” which will remain open pending the entry of a final decree by this Court closing the Remaining Case. Solely for administrative purposes, all Remaining Matters (as defined in the Final Decree), including claims reconciliation with respect to Claims against any Debtor, are to be filed, administered, and adjudicated in the Remaining Case.⁶

7. On the Effective Date, the Trust was created in accordance with the terms of the Thrasio Legacy Trust Agreement (and, together with the Plan and Confirmation Order, the “Plan Documents”), and META Advisors LLC was appointed as the Thrasio Legacy Trust Administrator. Pursuant to the Plan Documents, the Trust has the sole authority to file and prosecute objections to General Unsecured Claims that are not First Lien Deficiency Claims.⁷ The Trust also has the authority to settle, compromise, withdraw, litigate to judgment or otherwise resolve objections to General Unsecured Claims.⁸

8. On April 1, 2024, each of the Debtors filed their respective schedules of assets and liabilities (and as subsequently amended, the “Schedules”) pursuant to Bankruptcy Rule 1007.

9. On April 4, 2024, the Court entered an order establishing certain dates and deadlines for filing proofs of claim in the Debtors’ chapter 11 cases.⁹ Specifically, the Court established (i) May 6, 2024, as the general bar date applicable to all persons and entities asserting a Claim (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date (the “General Bar Date”); and (ii) September 4, 2024, as the deadline

⁶ See Final Decree, ¶ 3.

⁷ See Plan, § VII.B.

⁸ *Id.*

⁹ Main Case Docket No. 292.

for Governmental Units to file proofs of claim against the Debtors that arose on or prior to the Petition Date (the “Governmental Bar Date”).¹⁰ Pursuant to the Plan Documents, the Court also established July 18, 2024, as the deadline for filing a proof of claim for claims arising from the rejection of any executory contract or unexpired lease pursuant to the Plan or Confirmation Order (the “Rejection Bar Date,” and together with the General Bar Date and Governmental Bar Date, the “Bar Dates”).¹¹

10. To date, approximately 1,044 General Unsecured Claims were included on the Debtors’ Schedules. In addition, to date, approximately 258 General Unsecured Claims have been filed against the Debtors in the aggregate amount of over \$131 million. Because of the large number of claims in these chapter 11 cases, the Trust seeks authority to file omnibus objections to certain claims in accordance with the procedures set forth herein.

PROPOSED OBJECTION PROCEDURES

11. To expedite and ultimately complete the claims reconciliation process in a timely, efficient, and cost-effective manner, the Trust seeks approval to implement the procedures attached to the Proposed Order as **Exhibit 1** (the “Objection Procedures”). The Objection Procedures describe the key aspects of the proposed claims objection process, including, among other things:

- a. the form of omnibus objections (each, an “Omnibus Objection”) the Trust will utilize;
- b. the types of exhibits and supporting documentation the Trust will include with each Omnibus Objection;
- c. the form of the notice that will be provided to affected creditors (the “Objection Notice”);

¹⁰ *Id.*

¹¹ Plan, § V.C.

- d. the information necessary for affected creditors to attempt to informally resolve the objection to their Claim and/or file a formal response thereto, and the implications of failing to timely resolve or respond to such objection;
- e. information relating to filing a formal reply to a filed response; and
- f. information relating to discovery and hearings on Omnibus Objections.

12. To protect the due process rights of creditors, the Trust will comply with procedural safeguards for Omnibus Objections set forth in Bankruptcy Rule 3007(e) and Local Rule 3007-02. The Trust also intends to serve affected creditors with the Objection Notice, substantially in the form attached to the Proposed Order as **Exhibit 2**, that will include, among other things, (a) the name of the claimant, (b) the Proof of Claim number (or applicable Schedule reference), (c) the basis for the objection to each particular claim, (d) the response date and response procedures, and (e) the date, time, and location of the hearing and related procedures.

RELIEF PURSUANT TO BANKRUPTCY RULE 3007(C) AND (D)

13. Although the Trust expects to object to a number of claims on the grounds enumerated in Bankruptcy Rule 3007(d), certain claims may necessitate objections on additional grounds not expressly set forth therein (collectively, the “Additional Grounds”), including that such claims, in whole or in part:

- a. are inconsistent with the Debtors’ books and records;
- b. fail to specify the asserted claim amount (or only list the claim amount as “unliquidated”);
- c. fail to sufficiently specify the basis for the claim or provide sufficient supporting documentation in support of such claim;
- d. seek recovery of amounts for which the Debtors are not liable;
- e. are filed against non-Debtors;
- f. are disallowed pursuant to section 502 of the Bankruptcy Code; and/or

g. are disallowed pursuant to the terms of the Plan and/or Confirmation Order.

14. To minimize the cost, confusion, and delay otherwise attendant to preparing and filing individual objections on a claim-by-claim basis, the Trust seeks to object, pursuant to Bankruptcy Rule 3007(c) and (d), to various claims on the Additional Grounds outlined above in an Omnibus Objection format.

15. Overall, the relief sought in this Motion will allow the Trust to complete the claims reconciliation process in a timely, efficient, and cost-effective manner by avoiding the costs, resources, and delay attendant to preparing and filing potentially hundreds of individualized objections based on the same or similar underlying grounds. Notably, the Objection Procedures protect creditors' due process rights by implementing the same safeguards for Omnibus Objections set forth in Bankruptcy Rule 3007(e) and the individualized noticing process described above.

RELIEF REQUESTED

16. By this Motion, the Trust seeks entry of the Proposed Order: (a) approving the Objection Procedures outlined herein and attached to the Proposed Order as **Exhibit 1**; and (b) authorizing the Trust to assert substantive objections to General Unsecured Claims in an omnibus format pursuant to Bankruptcy Rules 3007(c) and (d).

BASIS FOR RELIEF

17. Section 502(a) of the Bankruptcy Code provides that “[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.”¹² Bankruptcy Rule 3001 states that “a proof of claim executed and filed in accordance with these rules shall constitute *prima facie* evidence of the validity and amount of the claim.”¹³

¹² 11 U.S.C. § 502(a).

¹³ *See* Fed. R. Bankr. P. 3001.

Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as Proofs of Claim.¹⁴ As such, the Trust must review all claims as part of the claims reconciliation process.

18. In addition to the grounds enumerated in Bankruptcy Rule 3007(d) for filing Omnibus Objections to claims, Bankruptcy Rule 3007(c) affords the Court discretion to authorize Omnibus Objections based upon grounds beyond those explicitly delineated by Bankruptcy Rule 3007(d).¹⁵ Section 105(a) of the Bankruptcy Code also provides that a bankruptcy court may “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions [of the Bankruptcy Code].”¹⁶ Under section 105(a), the Court has expansive equitable power to fashion any order or decree that is in the interest of preserving or protecting the value of a debtor’s assets.¹⁷

19. Authorizing the Trust to file Omnibus Objections consistent with the Objection Procedures is an appropriate use of the Court’s power under section 105(a) of the Bankruptcy Code and conforms to the spirit of Bankruptcy Rule 3007, the underlying goal of which is to balance the due process rights of creditors with the efficient administration of large chapter 11 cases.

20. The proposed Objection Procedures provide a cost-effective and efficient framework for the careful review, prosecution, and reconciliation of claims by, among other things,

¹⁴ See 11 U.S.C. § 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.”).

¹⁵ See Fed. R. Bankr. P. 3007(c) (“Unless otherwise ordered by the court or permitted by subdivision (d), objections to more than one Claim shall not be joined in a single objection.”).

¹⁶ 11 U.S.C. § 105(a).

¹⁷ See *Off. Comm. of Unsecured Creditors of Cybergenics Corp. ex rel. Cybergenics Corp. v. Chinery*, 330 F.3d 548, 567 (3d Cir. 2003) (recognizing the “bankruptcy court’s equitable power to craft flexible remedies”); see also *Comm. Of Equity Sec. Holders v. Lionel Corp. (In re Lionel Corp.)*, 722 F.2d 1063, 1069 (2d Cir. 1983) (“[A] bankruptcy judge must have substantial freedom to tailor his orders to meet differing circumstances.”).

(a) providing greater certainty in administering the objection process, (b) promoting the consensual resolution of claims objections or, alternatively, establishing efficient fair mechanisms to settle claims objections, and (c) reducing the cost, time, and delay associated with prosecuting claims objections. At the same time, the proposed Objection Procedures respect creditors' due process rights by implementing the safeguards set forth for Omnibus Objections already provided for under Bankruptcy Rule 3007(e) and requiring service of the Objection Notice on affected creditors in full compliance with the due process requirements of the Bankruptcy Code and Bankruptcy Rules.

21. Similarly, allowing the Trust to object to claims on the Additional Grounds in an omnibus format will promote the efficient and cost-effective administration of the Remaining Case. Specifically, the relief requested will save the Trust the time and expense of filing potentially hundreds of individual claim objections, which ultimately inures to the benefit of general unsecured creditors in preserving assets available for distribution. Moreover, the claims objection process will be well-organized, and all parties in interest will benefit from a streamlined filing process that will result in fewer pleadings, fewer hearings, and greater efficiency.

22. The relief sought herein is consistent with similar claims objection procedures regularly approved in recent chapter 11 cases.¹⁸

23. The Trust believes that the relief requested herein appropriately balances judicial and administrative efficiency with due process rights. Accordingly, the Trust respectfully requests that the Court approve the relief requested herein.

¹⁸ See, e.g., *In re Careismatic Brands, LLC*, No. 24-10569 (VFP) (Bankr. D.N.J. Jan. 22, 2025); *In re BowFlex Inc.*, No. 24-12364 (ABA) (Bankr. D.N.J. Jan. 7, 2025); *In re CTI Liquidation Co., Inc.*, No. 23-14853 (JKS) (Bankr. D.N.J. July 17, 2024); *In re WeWork, Inc., et al.*, No. 23-19865 (JKS) (Bankr. D.N.J. May 8, 2024); *In re RTW Retailwinds, Inc.*, No. 20-18445 (JKS) (Bankr. D.N.J. Feb. 22, 2021).

NOTICE

24. The Trust has provided notice of this Motion to: (a) the Office of the United States Trustee; and (b) all parties that have filed a request for service of papers under Bankruptcy Rule 2002 pursuant to the Effective Date Notice. The Trust submits that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

25. No prior motion for the relief requested in this Motion has been made to this or any other court.

WHEREFORE the Trust respectfully requests the entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other and further relief as is just and proper.

Dated: March 6, 2026

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Counsel for the Thrasio Legacy Trust

Exhibit A

(Proposed Order)

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> <p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>Lorenzo Marinuzzi (admitted <i>pro hac vice</i>) Doug Mannal (admitted <i>pro hac vice</i>) Jamie A. Levitt Theresa A. Foudy (admitted <i>pro hac vice</i>) J. Alexander Lawrence (admitted <i>pro hac vice</i>) MORRISON & FOERSTER LLP 250 West 55th Street New York, New York 10019-9601 Telephone: (212) 468-8000 Facsimile: (212) 468-7900 Email: lmarinuzzi@mofocom dmannal@mofocom jlevitt@mofocom tfoudy@mofocom alawrence@mofocom</p> <p><i>-and-</i></p> <p>James S. Carr Connie Y. Choe KELLEY DRYE & WARREN LLP 7 Giralda Farms, Suite 340 Madison, New Jersey 07940 Telephone: (973) 503-5900 Facsimile: (973) 503-5950 Email: jcarr@kelleydrye.com cchoe@kelleydrye.com</p> <p><i>Counsel for the Thrasio Legacy Trust</i></p>
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**ORDER (I) APPROVING OMNIBUS CLAIMS
OBJECTION PROCEDURES; AND (II) AUTHORIZING
THE THRASIO LEGACY TRUST TO FILE SUBSTANTIVE OMNIBUS
OBJECTIONS TO CLAIMS PURSUANT TO BANKRUPTCY RULE 3007(c) AND (d)**

The relief set forth on the following pages, numbered two (2) through and including three (3), is hereby ORDERED.

Page: 2
Debtor: 1 Thrasio One, Inc.
Case No.: 24-11850 (CMG)
Caption: Order (I) Approving Omnibus Claims Objection Procedures; and (II) Authorizing the Thrasio Legacy Trust to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007(c) and (d)

Upon consideration of the *Thrasio Legacy Trust's Motion for Entry of an Order (I) Approving Omnibus Claims Objection Procedures; and (II) Authorizing the Thrasio Legacy Trust to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007(c) and (d)* (the "Motion")¹ filed by the Thrasio Legacy Trust (the "Trust") established in the chapter 11 cases of Thrasio Holdings, Inc. and its affiliates (collectively, the "Debtors"), for entry of an order (this "Order"), (i) approving the Objection Procedures attached hereto, and (ii) authorizing the Trust to assert substantive objections to claims in an omnibus format pursuant to Bankruptcy Rule 3007(c) and (d), all as more fully described in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that the 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 the Trust's notice of the Motion and opportunity for a hearing thereon were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion; 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 this 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. Notwithstanding anything to the contrary in the Bankruptcy Code, the Bankruptcy Rules, or the Local Rules, and pursuant to Bankruptcy Rule 3007(c), the Trust may

¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

Page: 3

Debtor: 1 Thrasio One, Inc.

Case No.: 24-11850 (CMG)

Caption: Order (I) Approving Omnibus Claims Objection Procedures; and (II) Authorizing the Thrasio Legacy Trust to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007(c) and (d)

file Omnibus Objections that include objections to claims on any basis provided for in Bankruptcy Rule 3007(d) and/or the Additional Grounds.

3. The Trust may file and prosecute any Omnibus Objections in accordance with the Objection Procedures attached hereto as **Exhibit 1**, which are approved, and the other procedural safeguards set forth in Bankruptcy Rule 3007(e).

4. The form of Objection Notice attached hereto as **Exhibit 2** is approved.

5. Nothing in this Order or in the Motion is, or shall be deemed to constitute, any admission as to the validity, nature, amount, extent, or priority of any claim asserted against any of the Debtors in the chapter 11 cases, or as a waiver of any right of the Trust to dispute the validity, nature, amount, extent, or priority of, or otherwise object to, either in the same or subsequent objections, on any grounds to any such claims.

6. The Trust is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

7. The terms, conditions, and provisions of this Order shall be immediately effective and enforceable upon entry hereof.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Exhibit 1

(Objection Procedures)

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> <p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>Lorenzo Marinuzzi (admitted <i>pro hac vice</i>) Doug Mannal (admitted <i>pro hac vice</i>) Jamie A. Levitt Theresa A. Foudy (admitted <i>pro hac vice</i>) J. Alexander Lawrence (admitted <i>pro hac vice</i>) MORRISON & FOERSTER LLP 250 West 55th Street New York, New York 10019-9601 Telephone: (212) 468-8000 Facsimile: (212) 468-7900 Email: lmarinuzzi@mofocom dmannal@mofocom jlevitt@mofocom tfoudy@mofocom alawrence@mofocom</p> <p><i>-and-</i></p> <p>James S. Carr Connie Y. Choe KELLEY DRYE & WARREN LLP 7 Giralda Farms, Suite 340 Madison, New Jersey 07940 Telephone: (973) 503-5900 Facsimile: (973) 503-5950 Email: jcarr@kelleydrye.com cchoe@kelleydrye.com</p> <p><i>Counsel for the Thrasio Legacy Trust</i></p>
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PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

On March __, 2026, the Thrasio Legacy Trust (the “Trust”) established in the chapter 11 cases of Thrasio Holdings, Inc. and certain of its affiliates (collectively, the “Debtors”), filed the *Thrasio Legacy Trust’s Motion for Entry of an Order (I) Approving Omnibus Claims Objection Procedures; and (II) Authorizing the Thrasio Legacy Trust to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007(c) and (d)* (the “Motion”)² with the United States Bankruptcy Court for the District of New Jersey (the “Court”). On _____, 2026, the Court entered an order (the “Order”)³ approving the Motion, including these omnibus objection procedures.

Omnibus Objections

1. **Grounds for Omnibus Objections.** In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Trust may file omnibus objections (each, an “Omnibus Objection”) to claims on the grounds that such claims, in part or in whole:

- a. are inconsistent with the Debtors’ books and records;
- b. fail to specify the asserted claim amount (or only list the claim amount as “unliquidated”);
- c. fail to sufficiently specify the basis for the claim or provide sufficient supporting documentation in support of such claim;
- d. seek recovery of amounts for which the Debtors are not liable;
- e. are filed against non-Debtors;
- f. are disallowed pursuant to section 502 of the Bankruptcy Code; and/or
- g. are disallowed pursuant to the terms of the Plan and/or Confirmation Order.

2. **Form of Omnibus Objections.** Each Omnibus Objection will be numbered consecutively, regardless of basis.

3. **Supporting Documentation.** To the extent appropriate, Omnibus Objections may be accompanied by an affidavit or declaration from someone with personal knowledge of the Debtor’s books and records and the manner in which they are maintained that states that the affiant or the declarant has reviewed the claims included therein and applicable supporting information and documentation provided therewith, made reasonable efforts to research the claim on the

² Docket No. [__].

³ Docket No. [__].

Debtor's books and records, and determined that the books and records do not reflect the debt or the amount of debt that is alleged in the claim.

4. Claims Exhibits. An exhibit listing the claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the claims to which there is a common basis for the Omnibus Objection. Claims for which there is more than one basis for an Omnibus Objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by claimant:

- a. the claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- b. the asserted amount of the claim;
- c. the grounds for the Omnibus Objection;
- d. a cross-reference to the section of the Omnibus Objection discussing such claim; and
- e. other information, as applicable, including: (i) the proposed classification of claims the Trust seeks to reclassify; (ii) the reduced claim amounts, of claims the Trust seeks to reduce; or (iii) the surviving claims, if any, of groups of claims the Trust seeks to expunge.

5. Objection Notice. Each Omnibus Objection will be accompanied by an objection notice, substantially in the form annexed to the Order as **Exhibit 2** (the "Objection Notice"), tailored, as appropriate, to address a particular creditor, claim, or objection, which will:

- a. describe the basic nature of the Omnibus Objection;
- b. inform creditors that their rights may be affected by the Omnibus Objection;
- c. describe the procedures for filing a written response (each, a "Response") to the objection, including all relevant dates and deadlines related thereto;
- d. identify the hearing date, if applicable, and related information; and
- e. describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the chapter 11 case may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served upon (a) the affected claimant party set forth on the Proof of Claim or the applicable schedule of assets and liabilities and their respective attorney of record (if any), (b) the U.S.

Trustee; and (c) parties that have filed a request for service of papers under Bankruptcy Rule 2002 pursuant to the Effective Date Notice.

7. Omnibus Hearings. Each Omnibus Objection shall be set for hearing no less than 30 days after service of the Omnibus Objection (the "Hearing"). In the Trust's sole discretion, and after notice to the affected claimant, the Trust may adjourn the Hearing on the Omnibus Objection to a subsequent hearing date. For claims subject to an Omnibus Objection and with respect to which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures but such Response is resolved prior to the Hearing, the Trust may request at the Hearing that the Court enter an order granting the Omnibus Objection with respect to such claim. If such claims cannot be resolved and a hearing is determined to be necessary, the Trust shall file with the Court and serve on the affected claimants a notice of the hearing, to the extent the Trust did not file a notice of hearing previously.

8. Claims Paid or Payable by Third Parties. The Trust shall reduce in full a claim, and such claim shall be disallowed without a claim objection having to be Filed and without any further notice to or action, order or approval of the Court, to the extent that the holder of such claim receives payment in full on account of such Claim from a party that is not the Debtors or the Trust. To the extent a holder of such claim receives a distribution on account of such claim and receives payment from a party that is not the Debtors or the Trust on account of such claim, such holder shall repay, return, or deliver any distribution to the Trust, to the extent the holder's total recovery on account of such claim from the third party and under the Plan exceeds the amount of such claim as of the date of any such distribution under the Plan. The Trust and the Debtor's Estate reserve all rights, remedies, claims, and actions against any such holders who fail to repay or return any such distribution.

In the event the Trust asserts that a claim held by a claimant should be reduced or disallowed because such claim was partially paid or paid in full by a third-party, the Trust shall provide at least fourteen (14) days' notice to such claimant, with an opportunity for such claimant to object and be heard by the Court, prior to reducing or disallowing such claim.

9. Contested Matter. Each claim subject to an Omnibus Objection, along with any Responses thereto, shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such claim. The Trust may, in its discretion and in accordance with other orders of the Court, the Plan, or the provisions of the Bankruptcy Code and the Bankruptcy Rules, settle the priority, amount, extent, and validity of such contested claims without any further notice to or action, order, or approval of the Court.

Responses to Omnibus Objections

10. Parties Required to File a Response. Any party who disagrees with an Omnibus Objection is required to file a Response in accordance with the procedures set forth herein. If a claimant whose claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimants.

11. Response Contents. Each Response must contain the following (at a minimum):

- a. a caption stating the name of the Court, the name of the Debtor, the case number, the title of the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- b. a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to such claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;
- c. a copy of any other documentation or other evidence of the claim, to the extent not already included with the claim, upon which the claimant will rely in opposing the Omnibus Objection; *provided, however,* that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; *provided further, however,* that the claimant shall disclose to the Trust all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints; and
- d. the following contact information for the responding party:
 - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Trust should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.

12. Filing and Service of the Response. A Response will be deemed timely only if it is filed with the Court and *actually received* by 4:00 p.m. (prevailing Eastern Time) on the day that is twenty-one (21) calendar days from the date the Omnibus Objection is served (the "Response Date") by the following parties:

Counsel to the Trust	United States Trustee
<p>Morrison & Foerster LLP 250 West 55th Street New York, NY 10019 Attn: Lorenzo Marinuzzi Attn: Doug Mannal</p> <p>Kelley Drye & Warren LLP 7 Giralda Farms, Suite 340 Madison, New Jersey 07940 Attn: James S. Carr Attn: Connie Y. Choe</p>	<p>Office of the United States Trustee, Regions 3 & 9 One Newark Center, Suite 2100 Newark, NJ 07102 Attn: Jeffrey N. Sponder Attn: Lauren Bielskie</p>

13. Discovery. If the Trust determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the Trust will serve notice on the affected claimant and its counsel of record that the scheduled hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Such notice may be incorporated into the initial agenda letter for the hearing, or may be provided by separate notice.

14. Failure to Respond. A Response that is not filed and served by the Response Deadline in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent reaching an agreement with the Trust resolving the Omnibus Objection to a claim (as described in the Objection Notice), failure to timely file and serve a Response as set forth herein may result in the Court granting the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

15. Reply to a Response. The Trust shall be permitted to file a reply to any Response no later than two (2) business days before the hearing with respect to the relevant Omnibus Objection.

Miscellaneous

16. Additional Information. Copies of these procedures, the Motion, or Order or any other pleadings (the “Pleadings”) filed in the chapter 11 case are available for free online at the website of Kurtzman Carson Consultants, LLC dba Verita Global at <https://www.veritaglobal.net/thrasio>. You may also obtain copies of any of the Pleadings filed in the chapter 11 cases for a fee via PACER at <http://www.njb.uscourts.gov>.

17. Reservation of Rights. NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE TRUST TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A

CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

Exhibit 2

(Objection Notice)

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> <p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>Lorenzo Marinuzzi (admitted <i>pro hac vice</i>) Doug Mannal (admitted <i>pro hac vice</i>) Jamie A. Levitt Theresa A. Foudy (admitted <i>pro hac vice</i>) J. Alexander Lawrence (admitted <i>pro hac vice</i>) MORRISON & FOERSTER LLP 250 West 55th Street New York, New York 10019-9601 Telephone: (212) 468-8000 Facsimile: (212) 468-7900 Email: lmarinuzzi@mofocom dmannal@mofocom jlevitt@mofocom tfoudy@mofocom alawrence@mofocom</p> <p><i>-and-</i></p> <p>James S. Carr Connie Y. Choe KELLEY DRYE & WARREN LLP 7 Giralda Farms, Suite 340 Madison, New Jersey 07940 Telephone: (973) 503-5900 Facsimile: (973) 503-5950 Email: jcarr@kelleydrye.com cchoe@kelleydrye.com</p> <p><i>Counsel for the Thrasio Legacy Trust</i></p>
<p>In re:</p> <p>1 Thrasio One, Inc.</p> <p>Reorganized Debtor.¹</p>

Chapter 11

Case No. 24-11850 (CMG)

¹ Formerly jointly administered under *Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG). The last four digits of the Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

NOTICE OF OBJECTION TO YOUR CLAIM

To: _____ [Claim Holder and Counsel, if any]

The Thrasio Legacy Trust, established in the chapter 11 cases of Thrasio Holdings, Inc. and certain of its affiliates, has filed the enclosed _____ [Title of Objection] [which seeks to alter your rights by _____].²

[Describe effect of the Objection, i.e., disallowing, reducing, modifying, etc.]

If you disagree with the Objection, you must file a response to the Objection with the Clerk of the Bankruptcy Court at the address below on or before _____, 2026.

At the same time, you must also serve a copy of the response upon the following parties:

Counsel to the Trust	United States Trustee
Morrison & Foerster LLP 250 West 55 th Street New York, NY 10019-9601 Attn: Lorenzo Marinuzzi Attn: Doug Mannal Kelley Drye & Warren LLP 7 Giralda Farms, Suite 340 Madison, New Jersey 07940 Attn: James S. Carr Attn: Connie Y. Choe	Office of the United States Trustee, Regions 3 & 9 One Newark Center, Suite 2100 Newark, NJ 07102 Attn: Jeffrey N. Sponder Attn: Lauren Bielskie

If you file a response, you or your attorney must appear at a hearing on the objection that will be held before the Honorable Christine M. Gravelle on _____, 2026 at __:__.m. at

² _____
Docket No. [____].

the United States Bankruptcy Court for the District of New Jersey, Courtroom #3, 402 East State Street, Trenton, N.J. 08608.

IF YOU DO NOT RESPOND TO THE OBJECTION, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.