

THIS FIRST OMNIBUS OBJECTION SEEKS TO DISALLOW CERTAIN PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1 THROUGH SCHEDULE 5 ATTACHED TO THE PROPOSED ORDER.

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

In re:

1 THRASIO ONE, INC.,

Reorganized Debtor.¹

Chapter 11

Case No. 24-11850 (CMG)

Hearing Date: April 14, 2026
Hearing Time: 10:00 a.m. (ET)
Response Deadline: April 7, 2026

**FIRST OMNIBUS OBJECTION OF THE THRASIO
LEGACY TRUST TO CERTAIN PROOFS OF CLAIM
(LATE-FILED, AMENDED, DUPLICATIVE, SATISFIED AND EQUITY)**

The Thrasio Legacy Trust (the “Trust”), by and through META Advisors LLC, solely in its capacity as trustee of the Trust (the “Trustee”), hereby submits this objection (this “Objection”) and respectfully requests entry of an order, substantially in the form attached

¹ The last four digits of 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.



hereto as **Exhibit A** (the “Proposed Order”), disallowing and expunging each proof of claim identified on **Schedules 1–5** to the Proposed Order (collectively, the “Disputed Claims,” and the related claimants, the “Claimants”), because the Disputed Claims either (i) were late-filed; (ii) were amended and superseded by later filed proofs of claim; (iii) are duplicative of another proof of claim filed in the same amount and priority; (iv) were previously satisfied; or (v) were filed on account of equity interests and are not claims. In support of this Objection, the Trust submits the *Declaration of Dana P. Kane in Support of the First Omnibus Objection of the Thrasio Legacy Trust to Certain Proofs of Claim* (the “Kane Declaration”), attached hereto as **Exhibit B**. In further support of this Objection, the Trust states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of New Jersey (the “Court”) has jurisdiction over this matter 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.). 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. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory basis for the relief sought herein is section 502(b) 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 3007-2 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the “Local Rules”). This Objection complies in all respects with Local Rules 3007-1 and 3007-2.

BACKGROUND

A. Case Background

4. On February 28, 2024 (the “Petition Date”), Thrasio Holdings, Inc. and certain of its affiliates (the “Debtors”) commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. In accordance with the *Order Pursuant to Fed. R. Bankr. P. 1015(b) Directing Joint Administration of Related Chapter 11 Cases*, the Debtors’ cases were jointly administered pursuant to Bankruptcy Rule 1015 under Case No. 24-11840 (the “Main Case Docket”) until the closure of all of the Debtors’ cases other than the chapter 11 case of 1 Thrasio One, Inc.² 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 (as defined below).

5. On April 1, 2024, each of the Debtors filed their respective schedules of assets and liabilities (as amended, the “Schedules”) pursuant to Bankruptcy Rule 1007.³

6. 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”) ⁴ 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”).⁵ On June 18, 2024 the Plan became effective (the “Effective Date”).⁶

² Main Case, Docket Nos. 64, 1983.

³ See Main Case, Docket No. 280 (Schedules of Thrasio Holdings, Inc.).

⁴ Main Case, Docket No. 1124.

⁵ Main Case, Docket No. 398, and as subsequently amended. Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Plan.

⁶ Main Case, Docket No. 1143.

7. By operation of the Plan and the Confirmation Order, the Trust was created in accordance with the terms of the *Thrasio Legacy Trust Agreement and Declaration of Trust* (the “Trust Agreement” and, together with the Plan and Confirmation Order, the “Plan Documents”) on the Effective Date.⁷ 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.⁸ The Trust also has the authority to settle, compromise, withdraw, litigate to judgment or otherwise resolve objections to General Unsecured Claims.⁹

8. Pursuant to Paragraph 70 of the Confirmation Order, holders of Allowed General Unsecured Claims are entitled to (a) a single Claim with respect to any particular debt owed and (b) a single distribution under the Plan on account of their Allowed General Unsecured Claims, regardless of which Debtor was originally liable for such Claims.¹⁰ Additionally, “any and all General Unsecured Claims based on joint and several liability or a guaranty by one or more Debtor(s) shall be deemed eliminated and extinguished.”¹¹

B. Claims Reconciliation Background

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.¹² 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

⁷ Plan, § IV.J.

⁸ *Id.*, § VII.B. As noted on **Schedule 2**, the Reorganized Debtor has consented to the Trust’s inclusion on this Objection of the priority unsecured portion with respect to two Claims.

⁹ *Id.*

¹⁰ Confirmation Order, at ¶ 70.

¹¹ *Id.*

¹² Main Case, Docket No. 292.

or prior to the Petition Date (the “General Bar Date”); and (ii) September 4, 2024 as the deadline for Governmental Units to file proofs of claim against the Debtors that arose on or prior to the Petition Date (the “Governmental Bar Date”).¹³ 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”).¹⁴

10. The Debtors included 1,044 General Unsecured Claims on their schedules. In addition, to date, 258 General Unsecured Claims have been filed against the Debtors in the aggregate amount of over \$131 million.

RELIEF REQUESTED

11. By this Objection and for the reasons described below, the Trust requests entry of the Proposed Order disallowing and expunging the Disputed Claims identified on **Schedules 1–5** of the Proposed Order.

BASIS FOR RELIEF

12. When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant.¹⁵ To receive the benefit of *prima facie* validity, the proof of claim must “set forth facts necessary to

¹³ *Id.*

¹⁴ Plan, § V.C.

¹⁵ *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992).

support the claim.”¹⁶ Where the claimant alleges sufficient facts to support its claim, the claim is afforded *prima facie* validity.¹⁷

13. Section 502(a) of the Bankruptcy Code provides, in pertinent part, 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.”¹⁸ Thus, while a properly-filed proof of claim is *prima facie* evidence of the claim’s allowed amount, when an objecting party presents evidence to rebut a claim’s *prima facie* validity, the claimant bears the burden of proving the claim’s validity by a preponderance of evidence.¹⁹ The burden of persuasion with respect to the claim is always on the claimant.²⁰ The failure to allege facts and to provide sufficient support for a claim deprives the claim of *prima facie* validity.²¹

14. Bankruptcy Rule 3007, in turn, requires that an objection to a proof of claim be made in writing, and the claimant be provided with not less than thirty days’ notice of the hearing to be held in respect of such objection.²² Objections of up to one hundred claims may be joined in an omnibus objection if such objections are based on the grounds that the claims should be disallowed, in whole or in part, for any of eight enumerated reasons, including that they duplicate other claims, have been amended by later proofs of claim, were not timely filed, or have been satisfied or released during the bankruptcy case.²³

¹⁶ *In re Stoecker*, 143 B.R. 879, 883 (N.D. Ill. 1992).

¹⁷ *See In re Allegheny Int’l, Inc.*, 954 F.2d at 173.

¹⁸ 11 U.S.C. § 502(a).

¹⁹ *See In re Allegheny Int’l, Inc.*, 954 F.2d at 173–74.

²⁰ *See, e.g., Biolitec, AG v. Cyganowski*, No. 13-cv-5864, 2013 WL 6795400, *3 (D. N.J. Dec. 16, 2013); *see also In re Allegheny Int’l, Inc.*, 954 F.2d at 173–74.

²¹ *See, e.g., In re Jorzak*, 314 B.R. 474, 481–82 (Bankr. D. Conn. 2004) (discussing the evidentiary requirements and burden of proof with respect to the allowance of claims).

²² *See* Fed. R. Bankr. P. 3007(a).

²³ Fed. R. Bankr. P. 3007(d).

15. Section 502(b)(1) of the Bankruptcy Code additionally provides, in part, that a claim may not be allowed to the extent that it “is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.”²⁴ Section 502(b)(9) further states that a claim shall not be allowed “to the extent that . . . proof of such claim is not timely filed”²⁵

16. For the reasons set forth below, there is ample evidence to rebut the *prima facie* validity of each Disputed Claim.

A. Late-Filed Claims

17. The Trust submits that each of the claims listed on **Schedule 1** to the Proposed Order (the “Late-Filed Claims”) should be disallowed because: (i) the Late-Filed Claims were filed after the applicable Bar Date; and (ii) the Trust is unaware of any motions seeking leave to file any such Late-Filed Claims or any other agreement with respect to the time of filing such Late-Filed Claims. Moreover, if the Late-Filed Claims are not eliminated, the claims of other stakeholders will be negatively impacted in the calculation of the recovery available to general unsecured creditors under the Plan.

18. Therefore, the Trust seeks entry of the Proposed Order disallowing the Late-Filed Claims set forth in **Schedule 1** to the Proposed Order.

B. Amended Claims

19. The Trust and its professionals reviewed the Debtors’ books and records and the claims register and determined that each claim identified on **Schedule 2** to the Proposed Order, in the column labeled “Amended Claim No.” (the “Amended and Superseded Claims”) was

²⁴ 11 U.S.C. § 502(b)(1).

²⁵ 11 U.S.C. § 502(b)(9); *see also Berger v. Trans World Airlines, Inc. (In re Trans World Airlines, Inc.)*, 96 F.3d 687, 690 (3d Cir. 1996) (“The bar date means just that; it is a ‘drop-dead date’ that bars all prepetition claimants who received the required notice”).

superseded by another claim, in the column labeled “Surviving Claim No.” filed by the same claimant.

20. Failure to disallow the Amended and Superseded Claims could result in the applicable Claimants receiving an unwarranted and duplicate recovery on account of the same claim. The Trust notes that the Claimants will not be prejudiced if their Amended and Superseded Claims are disallowed because the Claimants will retain their respective “Surviving Claims” also identified on **Schedule 2** to the Proposed Order.²⁶

21. Therefore, the Trust seeks entry of the Proposed Order disallowing the Amended and Superseded Claims set forth in **Schedule 2** to the Proposed Order.

C. Duplicative Claims

22. The Trust’s professionals reviewed the Debtors’ books and records and the claims register and determined that the claims identified on **Schedule 3** to the Proposed Order, in the column “Duplicative Claim to be Disallowed” (the “Duplicative Claims”) are identical to another claim filed by the same claimant asserting the same liability in the same amount and priority identified on **Schedule 3** in the column “Surviving Claims”. The Duplicative Claims include claims for the same liability filed against different Debtors. Pursuant to paragraph 70 of the Confirmation Order (i) holders of Allowed General Unsecured Claims are only entitled to a single claim with respect to any particular debt owed, and (ii) claims asserted against multiple Debtors based on joint and several liability or a guaranty are deemed eliminated and extinguished.

23. Absent disallowance of the Duplicative Claims, the applicable Claimants could receive a double (or greater) recovery on account of a single obligation to the detriment of

²⁶ As the claims reconciliation process is ongoing, the Trust reserves all rights to object to any Surviving Claim on any grounds.

the Debtors' estate and other creditors. The Trust notes that the Claimants will not be prejudiced if the Duplicative Claims are disallowed, because the Claimants will retain their "Surviving Claims" also identified on **Schedule 3** to the Proposed Order.²⁷

24. Accordingly, the Trust seeks entry of the Proposed Order disallowing the Duplicative Claims listed on **Schedule 3** to the Proposed Order.

D. Satisfied Claims

25. The Trust, having thoroughly reviewed the Debtor's Schedule of Assumed Executory Contracts and Unexpired Leases and the claims register, identified the claims identified on **Schedule 4** to the Proposed Order (the "**Satisfied Claims**") which have been satisfied prior to, during, or after these chapter 11 cases in accordance with the Bankruptcy Code, any applicable rules, Court orders, or in the ordinary course of business. Additionally, the Trust has been advised by the Reorganized Debtors that each of the Satisfied Claims has been fully satisfied by payment from the Debtors or Reorganized Debtors. Section V.D. of the Plan provides: "[a]ny Proofs of Claim Filed with respect to an Executory Contract or Unexpired Lease that has been assumed or assumed and assigned shall be deemed Disallowed and expunged, without further notice to, or action, order, or approval of the Bankruptcy Court."²⁸

26. The failure to disallow the Satisfied Claims could result in the claimant receiving an unwarranted recovery from the Trust. Furthermore, elimination of the Satisfied Claims will enable the Trust to maintain a more accurate claims register and will not prejudice the claimant.

²⁷ As the claims reconciliation process is ongoing, the Trust reserves all rights to object to any Surviving Claim on any grounds.

²⁸ Plan, § V.D.

27. Therefore, the Trust requests that the Court enter an order disallowing the Satisfied Claims identified on **Schedule 4** to the Proposed Order.

E. Equity Claims

28. The Trust objects to each of the Claims listed on **Schedule 5** to the Proposed Order (the “Equity Claims”). As set forth in the Declaration, the Trust has reviewed the Equity Claims and has determined that each of them reflects Interests, as defined by the Plan. Pursuant to the Plan, as of the Effective Date, all Interests in the Debtors classified in Class 5 through Class 11 were deemed “cancelled, released and extinguished,” and holders of Interests are not entitled to any recovery or distribution on account of their Interests.²⁹ Additionally, the ownership of Interests in any of the Debtors does not constitute a Claim against any of the Debtors within the meaning of section 101(5) of the Bankruptcy Code.³⁰ Accordingly, the Trust seeks disallowance of the Equity Claims.

RESERVATION OF RIGHTS

29. The Trust hereby reserves the right to amend, modify, and supplement this Objection, prior to the hearing before the Court on this Objection, if any; *provided, however*, that nothing in this Objection shall affect the Trust’s right to object to any Disputed Claim identified on **Schedules 1–5** to the Proposed Order or any other proof of claim at a future date on a basis other than as set forth in this Objection as permitted by bankruptcy or nonbankruptcy law, subject to any limitations set forth in the Local Rules or in the Proposed Order.

²⁹ See Plan §§ Section III.C.5 – III.C.11.

³⁰ Compare 11 U.S.C. § 101(5) (providing that the term “claim” means a “right to payment” or a “right to an equitable remedy for breach of performance if such breach gives rise to a right to payment”) with 11 U.S.C. § 101(16) (providing that the term “equity security” means, among other things, a share in a corporation whether or not denominated “stock”, or a warrant or right to purchase, sell or subscribe to the same).

30. Notwithstanding anything to the contrary herein, nothing contained in this Objection or any actions taken pursuant to any order granting the relief requested by this Objection is intended or should be construed as (a) an implication or admission as to the amount of, basis for, or validity of any particular claim against the Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Trust's or any other party in interest's rights to dispute any particular claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication, admission, or finding that any particular claim is an administrative expense claim, other priority claim or otherwise of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a modification of the assumption or rejection of any lease or executory contract as set forth in the Confirmation Order and Plan; or (f) a waiver or limitation of the Trust's, or any other party in interest's, claims, causes of action, or other rights under the Bankruptcy Code or any other applicable law.

STATEMENT OF COMPLIANCE WITH LOCAL RULES

31. Counsel for the Trust has reviewed the requirements of Local Rule 3007-1 and certifies that this Objection substantially complies with such Local Rule. To the extent that the Objection does not comply in all respects with the requirements of Local Rule 3007-1, the Trust believes such deviations are not material and respectfully request that any such requirement be waived. The Trust, in compliance with Local Rule 3007-2, is concurrently filing the *Notice of Objection to Your Claim* in response to the Claimants' proofs of claim, attached hereto as **Exhibit C**, and will serve the same upon the Claimants listed in **Schedules 1-5** to the Proposed Order.

NOTICE

32. The Trust will provide notice of this Objection to the following parties or their respective counsel: (a) the U.S. Trustee; (b) the Claimants; and (c) any party that has

requested notice pursuant to Bankruptcy Rule 2002. The Trust submits that, in light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

WHEREFORE, the Trust requests entry of an order, substantially in the form attached hereto as **Exhibit A**, granting (a) the relief requested herein, and (b) such other relief as the Court deems appropriate under the circumstances.

Dated: March 13, 2026

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Counsel to the Thrasio Legacy Trust

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
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<i>-and-</i>	
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@mof.com dmannal@mof.com jlevitt@mof.com tfoudy@mof.com alawrence@mof.com	
<i>Counsel to the Thrasio Legacy Trust</i>	
In re:	Chapter 11
1 Thrasio One, Inc.	Case No. 24-11850 (CMG)
Reorganized Debtor. ¹	

**ORDER SUSTAINING THE FIRST OMNIBUS OBJECTION OF
THE THRASIO LEGACY TRUST TO CERTAIN PROOFS OF CLAIM**

The relief set forth on the following pages, numbered two (2) through four (4), is

ORDERED.

¹ The last four digits of 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..

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Debtors: 1 THRASIO ONE, INC.

Case No. 24-11850 (CMG)

Caption of Order: ORDER SUSTAINING THRASIO LEGACY TRUST'S FIRST
OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM

Upon the omnibus objection (the “Objection”)¹ of the Thrasio Legacy Trust (the “Trust”), requesting entry of an order (this “Order”) disallowing and expunging the claims set forth in **Schedules 1-5** attached hereto, all as more fully set forth in the Objection; and the Court having jurisdiction to consider the Objection 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* from 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 this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it 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 Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Trust’s notice of the Objection and opportunity for a hearing on the Objection were appropriate and no other notice need be provided; and this Court having reviewed the Objection and the Kane Declaration 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 Objection and at the Hearing 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 Objection is sustained as set forth herein.

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

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Debtors: 1 THRASIO ONE, INC.

Case No. 24-11850 (CMG)

Caption of Order: ORDER SUSTAINING THRASIO LEGACY TRUST'S FIRST
OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM

2. Each of the Late-Filed Claims identified on **Schedule 1** attached to this Order is hereby disallowed and expunged in its entirety.

3. Each of the Amended and Superseded Claims identified on **Schedule 2** attached to this Order is hereby disallowed and expunged in its entirety, without prejudice to the treatment of any Surviving Claims also identified on **Schedule 2**.

4. Each of the Duplicative Claims identified on **Schedule 3** attached to this Order is hereby disallowed and expunged in its entirety, without prejudice to the treatment of the Surviving Claims also identified on **Schedule 3**.

5. Each of the Satisfied Claims identified on **Schedule 4** attached to this Order is hereby disallowed and expunged in its entirety.

6. Each of the Equity Claims identified on **Schedule 5** attached to this Order is hereby disallowed and expunged in its entirety.

7. Kurtzman Carson Consultants, LLC dba Verita Globa, the claims and noticing agent appointed in these cases (the "Claims Agent"), is authorized and directed to modify the claims register in accordance with entry of the relief granted in this Order.

8. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any particular claim against the Reorganized Debtors or the Trust under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Trust's, the Reorganized Debtors', or any other party in interest's rights to dispute any particular claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication, admission, or finding that any particular claim is an administrative expense claim, other priority

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Debtors: 1 THRASIO ONE, INC.

Case No. 24-11850 (CMG)

Caption of Order: ORDER SUSTAINING THRASIO LEGACY TRUST'S FIRST
OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM

claim or otherwise of a type specified or defined in the Objection or this Order; (e) a modification of the assumption or rejection of any lease or executory contract as set forth in the Confirmation Order and Plan; or (f) a waiver or limitation of the Trust's, the Reorganized Debtors', or any other party in interest's, claims, causes of action, or other rights under the Bankruptcy Code or any other applicable law.

9. Notice of the Objection as provided therein shall be deemed good and sufficient notice of such Objection and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

10. The Trust and the Claims Agent are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

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

Schedule 1

Late-Filed Claims

Claimant	Claim No.	Date Filed	Debtor	Claim Priority	Claim Amount	Reason for Disallowance
Back to Nature, LLC	158	5/18/2024	Rosewood Wish, Inc.	General Unsecured	Unliquidated	Claim was filed after the General Bar Date.
Borderfree Trade Limited	151	5/13/2024	Thrasio Holdings, Inc.	General Unsecured	£25,619.13 GBP	Claim was filed after the General Bar Date.
ClimatePartner LLC	149	5/9/2024	Thrasio Holdings, Inc.	General Unsecured	\$700.00	Claim was filed after the General Bar Date.
Ebner Media Group GmbH	175	6/6/2024	Thrasio Holdings, Inc.	General Unsecured	\$6,523.98	Claim was filed after the General Bar Date.
Franchise Tax Board	256	9/4/2024	Thrasio Holdings, Inc.	General Unsecured	\$369.28	Claim for “taxes and/or fees” was filed after the General Bar Date and the Governmental Bar Date.
Franchise Tax Board	264	3/21/2025	Thrasio Holdings, Inc.	General Unsecured	\$369.28	Claim for “taxes and/or fees” was filed after the General Bar Date and the Governmental Bar Date.
Johnson, Anthony	245	8/12/2024	Thrasio Holdings, Inc.	General Unsecured	\$1,000,000.00	Claim was filed after the General Bar Date.
Ogletree Deakins	247	8/20/2024	Thrasio Holdings, Inc.	General Unsecured	\$1,358.34	Claim was filed after the General Bar Date.
Rafa Lombardino dba Word Awareness Inc	148	5/7/2024	Thrasio Holdings, Inc.	General Unsecured	\$100.00	Claim was filed after the General Bar Date.
Rise Contracting LLC	259	11/20/2024	Thrasio Holdings, Inc.	General Unsecured	\$34,174.00	Claim was filed after the General Bar Date.

Claimant	Claim No.	Date Filed	Debtor	Claim Priority	Claim Amount	Reason for Disallowance
Sarah and Todd Douglass Back to Nature, LLC	156	5/15/2024	Thrasio Holdings, Inc.	General Unsecured	Unliquidated	Claim was filed after the General Bar Date.
TeamViewer	172	6/5/2024	Thrasio Holdings, Inc.	General Unsecured	\$28,890.24	Claim was filed after the General Bar Date.
Weinraub, Elias	159	5/22/2024	Thrasio Holdings, Inc.	General Unsecured	\$4,712.50	Claim was filed after the General Bar Date. In addition, this Claim was also included on Schedule 5 as an Equity Claim.

Schedule 2

Amended and Superseded Claims

Claimant	Amended Claim No.	Amended Claim Debtor	Amended Claim Priority	Amended Claim Amount	Surviving Claim No.	Surviving Claim Debtor	Surviving Claim Priority	Surviving Claim Amount	Reason for Disallowance
Beck, Danielle	140	Autumn Ideas, Inc.	General Unsecured	\$1,000,000.00	234	Autumn Ideas, Inc.	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim.
Beck, Danielle	142	Thrasio, LLC	General Unsecured	\$1,000,000.00	235	Thrasio, LLC	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim.
Benidt, Christine	139	Autumn Ideas, Inc.	General Unsecured	\$1,000,000.00	232	Autumn Ideas, Inc.	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim.
Benidt, Christine	144	Thrasio, LLC	General Unsecured	\$1,000,000.00	233	Thrasio, LLC	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim.
Bristols 6, Inc.	143	Thrasio, LLC	General Unsecured	\$1,000,000.00	230	Thrasio, LLC	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim.
Bristols 6, Inc.	145	Autumn Ideas, Inc.	General Unsecured	\$1,000,000.00	231	Autumn Ideas, Inc.	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim.
Internal Revenue Service	163	Thrasio, LLC	Priority ¹ General Unsecured	\$39,799.71 \$602,317.47	258	Thrasio, LLC	Priority General Unsecured	\$48,224.82 \$643,386.87	The Surviving Claim expressly amends and supersedes the Amended Claim.

¹ The Reorganized Debtors have consented to the Trust's inclusion of the priority portion of this Claim on the Objection.

Claimant	Amended Claim No.	Amended Claim Debtor	Amended Claim Priority	Amended Claim Amount	Surviving Claim No.	Surviving Claim Debtor	Surviving Claim Priority	Surviving Claim Amount	Reason for Disallowance
Internal Revenue Service	74	Ideastream Consumer Products, LLC	Priority ² General Unsecured	\$2,351.96 \$16,542.90	228	Ideastream Consumer Products, LLC	Priority General Unsecured	\$2,351.96 \$16,542.90	The Surviving Claim expressly amends and supersedes the Amended Claim.
Urdea, Alex	89	Thrasio Holdings, Inc.	General Unsecured	Unliquidated	90	Thrasio Holdings, Inc.	General Unsecured	Unliquidated	The Surviving Claim expressly amends and supersedes the Amended Claim.
Word Ape, LLC	20	Cheddar Creations, Inc.	General Unsecured	Unliquidated	21	Cheddar Creations, Inc.	General Unsecured	Unliquidated	The Surviving Claim expressly amends and supersedes the Amended Claim.
Zurich American Insurance Company	173	Thrasio Holdings, Inc.	General Unsecured	\$1.00	174	Thrasio Holdings, Inc.	General Unsecured	\$1.00	The Surviving Claim expressly amends and supersedes the Amended Claim.

² The Reorganized Debtors have consented to the Trust's inclusion of the priority portion of this Claim on the Objection.

Schedule 3

Duplicative Claims

Claimant	Duplicative Claim No.	Duplicative Claim Debtor	Duplicative Claim Amount	Surviving Claim No.	Surviving Claim Debtor	Surviving Claim Amount	Reason for Disallowance
AIG Property Casualty, Inc. and its Affiliates Identified on the Addendum Hereto	84	Thrasio, LLC	Unliquidated	81	Thrasio Holdings, Inc.	Unliquidated	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
AIG Property Casualty, Inc. and its Affiliates Identified on the Addendum Hereto	82	E&L Enterprises Limited	Unliquidated	81	Thrasio Holdings, Inc.	Unliquidated	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Anthony DeCarlo, individually and as Sellers Representative of former equity holders of IdeaStream Consumer Products, LLC	41	Hippolyte, Ltd.	Unliquidated	40	Thrasio, LLC	Unliquidated	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Anthony DeCarlo, individually and as Sellers Representative of former equity holders of IdeaStream Consumer Products, LLC	42	Ideastream Consumer Products, LLC	Unliquidated	40	Thrasio, LLC	Unliquidated	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Beck, Danielle	235	Thrasio, LLC	\$2,471,000.00	234	Autumn Ideas, Inc.	\$2,471,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Benidt, Christine	233	Thrasio, LLC	\$2,471,000.00	232	Autumn Ideas, Inc.	\$2,471,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Bristols 6, Inc.	229	Autumn Ideas, Inc.	\$2,471,000.00	231	Autumn Ideas, Inc.	\$2,471,000.00	Claim No. 229 is duplicative of Claim No. 231.

Claimant	Duplicative Claim No.	Duplicative Claim Debtor	Duplicative Claim Amount	Surviving Claim No.	Surviving Claim Debtor	Surviving Claim Amount	Reason for Disallowance
Bristols 6, Inc.	230	Thrasio, LLC	\$2,471,000.00	231	Autumn Ideas, Inc.	\$2,471,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
ESR, LLC	19	Thrasio, LLC	\$2,000,000.00	18	Frosty Dream, Inc.	\$2,000,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Fat Kid Deals, Inc.	129	Thrasio Holdings, Inc.	\$2,444,328.00	132	Discus Dreams, Inc.	\$2,444,328.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
GXO Logistics Supply Chain, Inc.	262	Thrasio, LLC	\$2,361,608.54	261	Charope, Inc.	\$2,361,608.54	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
OHK Sports, LLC	68	Thrasio, LLC	\$5,000,000.00	69	Ideastream Consumer Products, LLC	\$5,000,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
OHK Sports, LLC	71	Orange Fantasy, Inc.	\$5,000,000.00	69	Ideastream Consumer Products, LLC	\$5,000,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Sun Pleasure Co. Limited, a Hong Kong Limited Liability Company	133	Pantone Projects, Inc.	\$2,856,875.35	104	Thrasio Holdings, Inc.	\$4,616,017.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Sun Pleasure Co. Limited, a Hong Kong Limited Liability Company	138	Thrasio, LLC	\$4,616,017.00	104	Thrasio Holdings, Inc.	\$4,616,017.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.

Claimant	Duplicative Claim No.	Duplicative Claim Debtor	Duplicative Claim Amount	Surviving Claim No.	Surviving Claim Debtor	Surviving Claim Amount	Reason for Disallowance
The California Beach Co., LLC	99	Thrasio, LLC	\$12,286,841.00	96	Faint Orange Horizon, Inc.	\$12,286,841.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Urdea, Alex	115	Thrasio Holdings, Inc.	Unliquidated	90	Thrasio Holdings, Inc.	Unliquidated	Claim No. 115 is duplicative of Claim No. 90.

Schedule 4

Satisfied Claims

Claimant	Claim No.	Debtor	General Unsecured Claim Amount	Basis for Disallowance
CT Corporation	117	Thrasio, LLC	\$20,790.00	The Trust is advised by the Reorganized Debtors that the Claim was satisfied by cure payment made in connection with the assumption of claimant's contract. <i>See</i> Docket No. 1103, Exh A-1.
GXO Logistics Supply Chain, Inc.	260	Thrasio, LLC	\$385,801.15	The Trust is advised by the Reorganized Debtors that the Claim was satisfied by cure payment made in connection with the assumption of claimant's contract. <i>See</i> Docket No. 1103, Exh A-1.

Schedule 5

Equity Claims

Claimant	Claim No.	Debtor	Asserted Claim Priority	Claim Amount	Reason for Disallowance
Blitzer, David	45	Thrasio Holdings, Inc.	General Unsecured	\$250,000.00	Claimant lists “holder of preferred shares” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Bregante, Scott	128	Thrasio Holdings, Inc.	General Unsecured	\$65,905.00	Claimant lists “stock options” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Cherucheril, Steven	51	Thrasio Holdings, Inc.	General Unsecured	\$6,633.85	Claimant lists “state of the purchases of stock options” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Dasgupta, Indrajeet	31	Thrasio Holdings, Inc.	General Unsecured	\$70,000.00	Claimant lists “1000 shares not realized” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Golob, Katherine	50	Thrasio Holdings, Inc.	General Unsecured	\$6,164.02	Claimant lists “Thrasio Holdings, Inc. Common shares grant CS-707 issued on 01/01/2022” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of

Claimant	Claim No.	Debtor	Asserted Claim Priority	Claim Amount	Reason for Disallowance
					section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Laraqui, Meya	77	Thrasio Holdings, Inc.	General Unsecured	\$18,966.38	Claimant lists “exercise of an incentive stock option” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Othman, Suad	60	Thrasio Holdings, Inc.	General Unsecured	\$5,522.00	Claimant lists “shares purchased” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Oyomi, Joseph	34	Thrasio Holdings, Inc.	General Unsecured	\$24,500.00	Claimant asserts a claim of \$24,500.00 based on claimant’s status as an alleged holder of shares or stock options against the Debtors, but the documentation attached to the proof of claim does not include any supporting documentation entitling claimant to a general unsecured claim. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Puraj, Damir	38	Thrasio Holdings, Inc.	General Unsecured	\$8,952.80	Claimant lists “incentive stock option” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Reid, Erica	122	Thrasio Holdings, Inc.	General Unsecured	\$32,952.50	Claimant lists “stock options” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of

Claimant	Claim No.	Debtor	Asserted Claim Priority	Claim Amount	Reason for Disallowance
					section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Reid, Nathan	126	Thrasio Holdings, Inc.	General Unsecured	\$65,905.00	Claimant lists “stock options” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Warkentin, Nicholas	124	Thrasio Holdings, Inc.	General Unsecured	\$2,380.00	Claimant lists “RSUs” as the basis of the Claim in Box 8 of the applicable Proof of Claim form, which is commonly understood to refer to restricted stock units, and the Trust’s understanding is further supported by the claimant’s supporting documentation. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Weinraub, Elias	159	Thrasio Holdings, Inc.	General Unsecured	\$4,712.50	Claimant lists “shares owned” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. In addition, this Claim was also included on Schedule 1 as a Late-Filed Claim.

Exhibit B

Kane Declaration

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Connie Y. Choe
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Doug Mannal (admitted *pro hac vice*)
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Counsel to the Thrasio Legacy Trust

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

In re:

1 Thrasio One, Inc.

Reorganized Debtor¹.

Chapter 11

Case No. 24-11850 (CMG)

**DECLARATION OF DANA P. KANE
IN SUPPORT OF THE FIRST OMNIBUS OBJECTION
OF THE THRASIO LEGACY TRUST TO CERTAIN PROOFS OF CLAIMS**

I, Dana P. Kane, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an authorized representative of META Advisors LLC, in its capacity as trustee (the “GUC Trustee”) of the Thrasio Legacy Trust (the “Trust”), established in the above-captioned chapter 11 cases. I submit this declaration (the “Declaration”) for all permissible

¹ The last four digits of 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.

purposes under the Bankruptcy Rules, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence in support of the *First Omnibus Objection of the Thrasio Legacy Trust to Certain Proofs of Claim (Late-Filed, Amended, Duplicative, Satisfied and Equity)* (the “Objection”).²

2. As part of my current position in assisting with Trust’s responsibilities under the Plan and the GUC Trust Agreement, I am responsible for certain claims management and reconciliation matters. I am generally familiar with the Debtors’ business affairs and books and records that reflect, among other things, the Debtors’ liabilities and the amount thereof owed to its creditors as of the Petition Date.

3. I have read the Objection and am directly, or by and through the Trust’s advisors, familiar with the information contained therein and the schedules attached thereto.

4. I am authorized to submit this Declaration in support of the Objection. All matters set forth in this Declaration are based on: (a) my personal knowledge; (b) my review of relevant documents; (c) information supplied to me by the Trust’s advisors and by others at the Trust’s request; or (d) as to matters involving United States bankruptcy law or rules or other applicable laws, my reliance upon the advice of counsel or other advisors to the Trust. If called upon to testify, I could and would testify competently to the facts set forth herein.

5. To the best of my knowledge, information and belief, insofar as I have been able to ascertain after reasonable inquiry, considerable time, and resources have been expended to ensure a high level of diligence in reviewing and reconciling the proofs of claim filed against the Debtors in these cases.

² Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed to them in the Objection.

A. Late-Filed Claims

6. In evaluating the Late-Filed Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the Bar Date Order, relevant proofs of claim, and their supporting documentation (if any), and determined that the claims identified on **Schedule 1** of the Proposed Order arose or was deemed to arise before the Petition Date and were not filed by the applicable Bar Date.

7. As such, I believe that each of the Late-Filed Claims should be disallowed and expunged.

B. Amended and Superseded Claims

8. In evaluating the Amended and Superseded Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the relevant proofs of claim and their supporting documentation (if any), and determined that each Amended and Superseded Claim identified on **Schedule 2** of the Proposed Order was superseded by another claim filed in these cases. The claims listed in the "Amended Claim No." column on **Schedule 2** to the Proposed Order are claims that have been amended by the claims listed in the "Surviving Claim No." column in the same row on **Schedule 2** to the Proposed Order. The Amended and Superseded Claims either (i) identify itself on the face of the proof of claim as amending the Amended Claim by reference to the claim number or filing date of the Amended Claim, or (ii) relate to the same liability as the Amended Claim.

9. The reasons for disallowing each Amended and Superseded Claim is identified under the heading Reason for Disallowance on **Schedule 2** to the Proposed Order. In addition to the reasons identified on Schedule 2, disallowing the Amended and Superseded Claims will enable the Trust to maintain an accurate Claims Register.

10. As such, I believe it is appropriate for the Court to disallow and expunge the Amended Claims.

C. Duplicative Claims

11. In evaluating the Duplicative Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the relevant proofs of claim and supporting documentation, and determined that each "Duplicative Claim" identified on **Schedule 3** of the Proposed Order is a claim that arose when the claimant filed a proof of claim in the same nature or classification, and in the same amount, as the proof of claim listed in the column titled "Surviving Claim No." on **Schedule 3** to the Proposed Order.

12. I note that the claimants will not be prejudiced if the Duplicative Claims are disallowed and expunged, because the claimants will retain their Surviving Claims identified on **Schedule 3** to the Proposed Order, subject to the Trust's right to object to the Surviving Claims in the future, if warranted.

13. As such, I believe it is appropriate for the Court to disallow and expunge the Duplicative Claims.

D. Satisfied Claims

14. In evaluating the Satisfied Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the relevant proof of claim, supporting documentation, and the Debtors' Schedule of Assumed Executory Contracts and Unexpired Leases to ensure that the claimant's claim was fully satisfied, and determined that the "Satisfied Claims" identified on **Schedule 4** of the Proposed Order were fully satisfied by payment from the Debtors or Reorganized Debtors. Additionally, the Reorganized Debtors have informed counsel to the Trust that each of the Satisfied Claims has been fully satisfied by payment from the Debtors or Reorganized Debtors.

15. As such, I believe that the Satisfied Claims should be disallowed and expunged.

E. Equity Claims

16. In evaluating the Equity Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the relevant proof of claim and supporting documentation, and determined that the "Equity Claims" identified on Schedule 5 to the Proposed Order granting the Objection were filed on account of an equity interest. Pursuant to the Plan, as of the Effective Date all classes of equity Interests in the Debtors were deemed "cancelled, released, and extinguished," and holders of any Interests are not entitled to any recovery or distribution on account of their Interests.³ Additionally, the ownership of Interests in any of the Debtors does not constitute a Claim against any of the Debtors within the meaning of section 101(5) of the Bankruptcy Code.⁴ Accordingly, I believe the Equity Claims listed on Schedule 5 should be disallowed and expunged.

17. Failure to disallow and expunge the Disputed Claims identified above could result in the relevant claimant receiving an unwarranted recovery against the estates, to the detriment of other creditors. Accordingly, I believe that the Court should grant the relief requested in the Objection.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

³ See Plan §§ III.C.5 – III.C.11.

⁴ Compare 11 U.S.C. § 101(5) (providing that the term "claim" means a "right to payment" or a "right to an equitable remedy for breach of performance if such breach gives rise to a right to payment") with 11 U.S.C. § 101(16) (providing that the term "equity security" means, among other things, a share in a corporation whether or not denominated "stock", or a warrant or right to purchase, sell or subscribe to the same).

Dated: March 13, 2026

/s/ Dana P. Kane

Dana P. Kane

Exhibit C

Claim Objection Notice

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
James S. Carr Connie Y. Choe KELLEY DRYE & WARREN LLP 7 Giralda Farms, Suite 340 Madison, NJ 07940 Telephone: (973) 503-5900 Facsimile: (973) 503-5950 Email: jcarr@kelleydrye.com cchoe@kelleydrye.com	
<i>-and-</i>	
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@mof.com dmannal@mof.com jlevitt@mof.com tfoudy@mof.com alawrence@mof.com	
<i>Counsel to the Thrasio Legacy Trust</i>	
In re:	Chapter 11
1 Thrasio One, Inc.	Case No. 24-11850 (CMG)
Reorganized Debtor. ¹	

NOTICE OF OBJECTION TO YOUR CLAIM

TO: THE HOLDERS OF CLAIMS AND THEIR COUNSEL (IF ANY) SET FORTH ON EXHIBIT A HERETO

The Thrasio Legacy Trust (the “Trust”) has filed the enclosed *First Omnibus Objection of the Thrasio Legacy Trust to Certain Proofs of Claim (Late-Filed, Amended, Duplicative, Satisfied*

¹ The last four digits of 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..

and Equity) [Docket No. [_____]] (the “Objection”) which seeks to alter your rights by disallowing and expunging your claim as set forth in the Objection.

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 **April 7, 2026**.

At the same time, you must also serve a copy of the response upon the Trust’s attorneys:

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

If you file a response, you or your attorney must appear at a hearing on the objection that will be held before the Honorable Judge Christine M. Gravelle on **April 14, 2026 at 10:00 a.m.** **(ET)** at the United States Bankruptcy Court for the District of New Jersey, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, Courtroom #3.

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

Schedule 1

Late-Filed Claims

Claimant	Claim No.	Date Filed	Debtor	Claim Priority	Claim Amount	Reason for Disallowance
Back to Nature, LLC	158	5/18/2024	Rosewood Wish, Inc.	General Unsecured	Unliquidated	Claim was filed after the General Bar Date.
Borderfree Trade Limited	151	5/13/2024	Thrasio Holdings, Inc.	General Unsecured	£25,619.13 GBP	Claim was filed after the General Bar Date.
ClimatePartner LLC	149	5/9/2024	Thrasio Holdings, Inc.	General Unsecured	\$700.00	Claim was filed after the General Bar Date.
Ebner Media Group GmbH	175	6/6/2024	Thrasio Holdings, Inc.	General Unsecured	\$6,523.98	Claim was filed after the General Bar Date.
Franchise Tax Board	256	9/4/20r24	Thrasio Holdings, Inc.	General Unsecured	\$369.28	Claim for “taxes and/or fees” was filed after the General Bar Date and the Governmental Bar Date.
Franchise Tax Board	264	3/21/2025	Thrasio Holdings, Inc.	General Unsecured	\$369.28	Claim for “taxes and/or fees” was filed after the General Bar Date and the Governmental Bar Date.
Johnson, Anthony	245	8/12/2024	Thrasio Holdings, Inc.	General Unsecured	\$1,000,000.00	Claim was filed after the General Bar Date.
Ogletree Deakins	247	8/20/2024	Thrasio Holdings, Inc.	General Unsecured	\$1,358.34	Claim was filed after the General Bar Date.
Rafa Lombardino dba Word Awareness Inc	148	5/7/2024	Thrasio Holdings, Inc.	General Unsecured	\$100.00	Claim was filed after the General Bar Date.
Rise Contracting LLC	259	11/20/2024	Thrasio Holdings, Inc.	General Unsecured	\$34,174.00	Claim was filed after the General Bar Date.

Claimant	Claim No.	Date Filed	Debtor	Claim Priority	Claim Amount	Reason for Disallowance
Sarah and Todd Douglass Back to Nature, LLC	156	5/15/2024	Thrasio Holdings, Inc.	General Unsecured	Unliquidated	Claim was filed after the General Bar Date.
TeamViewer	172	6/5/2024	Thrasio Holdings, Inc.	General Unsecured	\$28,890.24	Claim was filed after the General Bar Date.
Weinraub, Elias	159	5/22/2024	Thrasio Holdings, Inc.	General Unsecured	\$4,712.50	Claim was filed after the General Bar Date. In addition, this Claim was also included on Schedule 5 as an Equity Claim.

Schedule 2

Amended and Superseded Claims

Claimant	Amended Claim No.	Amended Claim Debtor	Amended Claim Priority	Amended Claim Amount	Surviving Claim No.	Surviving Claim Debtor	Surviving Claim Priority	Surviving Claim Amount	Reason for Disallowance
Beck, Danielle	140	Autumn Ideas, Inc.	General Unsecured	\$1,000,000.00	234	Autumn Ideas, Inc.	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim.
Beck, Danielle	142	Thrasio, LLC	General Unsecured	\$1,000,000.00	235	Thrasio, LLC	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim. Note that the Surviving Claim is included on Schedule 3 as a Duplicative Claim.
Benidt, Christine	139	Autumn Ideas, Inc.	General Unsecured	\$1,000,000.00	232	Autumn Ideas, Inc.	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim.
Benidt, Christine	144	Thrasio, LLC	General Unsecured	\$1,000,000.00	233	Thrasio, LLC	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim. Note that the Surviving Claim is included on Schedule 3 as a Duplicative Claim.
Bristols 6, Inc.	143	Thrasio, LLC	General Unsecured	\$1,000,000.00	230	Thrasio, LLC	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim. Note that the Surviving Claim is included on Schedule 3 as a Duplicative Claim.

Claimant	Amended Claim No.	Amended Claim Debtor	Amended Claim Priority	Amended Claim Amount	Surviving Claim No.	Surviving Claim Debtor	Surviving Claim Priority	Surviving Claim Amount	Reason for Disallowance
Bristols 6, Inc.	145	Autumn Ideas, Inc.	General Unsecured	\$1,000,000.00	231	Autumn Ideas, Inc.	General Unsecured	\$2,471,000.00	The Surviving Claim expressly amends and supersedes the Amended Claim.
Internal Revenue Service	163	Thrasio, LLC	Priority ¹ General Unsecured	\$39,799.71 \$602,317.47	258	Thrasio, LLC	Priority General Unsecured	\$48,224.82 \$643,386.87	The Surviving Claim expressly amends and supersedes the Amended Claim.
Internal Revenue Service	74	Ideastream Consumer Products, LLC	Priority ¹ General Unsecured	\$2,351.96 \$16,542.90	228	Ideastream Consumer Products, LLC	Priority General Unsecured	\$2,351.96 \$16,542.90	The Surviving Claim expressly amends and supersedes the Amended Claim.
Urdea, Alex	89	Thrasio Holdings, Inc.	General Unsecured	Unliquidated	90	Thrasio Holdings, Inc.	General Unsecured	Unliquidated	The Surviving Claim expressly amends and supersedes the Amended Claim.
Word Ape, LLC	20	Cheddar Creations, Inc.	General Unsecured	Unliquidated	21	Cheddar Creations, Inc.	General Unsecured	Unliquidated	The Surviving Claim expressly amends and supersedes the Amended Claim.
Zurich American Insurance Company	173	Thrasio Holdings, Inc.	General Unsecured	\$1.00	174	Thrasio Holdings, Inc.	General Unsecured	\$1.00	The Surviving Claim expressly amends and supersedes the Amended Claim.

¹ The Reorganized Debtor has consented to the Trust's inclusion of the priority portion of this Claim on the Objection.

Schedule 3

Duplicative Claims

Claimant	Duplicative Claim No.	Duplicative Claim Debtor	Duplicative Claim Amount	Surviving Claim No.	Surviving Claim Debtor	Surviving Claim Amount	Reason for Disallowance
AIG Property Casualty, Inc. and its Affiliates Identified on the Addendum Hereto	84	Thrasio, LLC	Unliquidated	81	Thrasio Holdings, Inc.	Unliquidated	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
AIG Property Casualty, Inc. and its Affiliates Identified on the Addendum Hereto	82	E&L Enterprises Limited	Unliquidated	81	Thrasio Holdings, Inc.	Unliquidated	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Anthony DeCarlo, individually and as Sellers Representative of former equity holders of IdeaStream Consumer Products, LLC	41	Hippolyte, Ltd.	Unliquidated	40	Thrasio, LLC	Unliquidated	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Anthony DeCarlo, individually and as Sellers Representative of former equity holders of IdeaStream Consumer Products, LLC	42	Ideastream Consumer Products, LLC	Unliquidated	40	Thrasio, LLC	Unliquidated	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Beck, Danielle	235	Thrasio, LLC	\$2,471,000.00	234	Autumn Ideas, Inc.	\$2,471,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Benidt, Christine	233	Thrasio, LLC	\$2,471,000.00	232	Autumn Ideas, Inc.	\$2,471,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Bristols 6, Inc.	229	Autumn Ideas, Inc.	\$2,471,000.00	231	Autumn Ideas, Inc.	\$2,471,000.00	Claim No. 229 is duplicative of Claim No. 231.

Claimant	Duplicative Claim No.	Duplicative Claim Debtor	Duplicative Claim Amount	Surviving Claim No.	Surviving Claim Debtor	Surviving Claim Amount	Reason for Disallowance
Bristols 6, Inc.	230	Thrasio, LLC	\$2,471,000.00	231	Autumn Ideas, Inc.	\$2,471,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
ESR, LLC	19	Thrasio, LLC	\$2,000,000.00	18	Frosty Dream, Inc.	\$2,000,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Fat Kid Deals, Inc.	129	Thrasio Holdings, Inc.	\$2,444,328.00	132	Discus Dreams, Inc.	\$2,444,328.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
GXO Logistics Supply Chain, Inc.	262	Thrasio, LLC	\$2,361,608.54	261	Charope, Inc.	\$2,361,608.54	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
OHK Sports, LLC	68	Thrasio, LLC	\$5,000,000.00	69	Ideastream Consumer Products, LLC	\$5,000,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
OHK Sports, LLC	71	Orange Fantasy, Inc.	\$5,000,000.00	69	Ideastream Consumer Products, LLC	\$5,000,000.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Sun Pleasure Co. Limited, a Hong Kong Limited Liability Company	133	Pantone Projects, Inc.	\$2,856,875.35	104	Thrasio Holdings, Inc.	\$4,616,017.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
Sun Pleasure Co. Limited, a Hong Kong Limited Liability Company	138	Thrasio, LLC	\$4,616,017.00	104	Thrasio Holdings, Inc.	\$4,616,017.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.
The California Beach Co., LLC	99	Thrasio, LLC	\$12,286,841.00	96	Faint Orange Horizon, Inc.	\$12,286,841.00	Holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed pursuant to paragraph 70 of the Confirmation Order.

Claimant	Duplicative Claim No.	Duplicative Claim Debtor	Duplicative Claim Amount	Surviving Claim No.	Surviving Claim Debtor	Surviving Claim Amount	Reason for Disallowance
Urdea, Alex	115	Thrasio Holdings, Inc.	Unliquidated	90	Thrasio Holdings, Inc.	Unliquidated	Claim No. 115 is duplicative of Claim No. 90.

Schedule 4

Satisfied Claims

Claimant	Claim No.	Debtor	Claim Amount	Basis for Disallowance
CT Corporation	117	Thrasio, LLC	\$20,790.00	The Trust is advised by the Reorganized Debtors that the Claim was satisfied by cure payment made in connection with the assumption of claimant's contract. <i>See</i> Docket No. 1103, Exh A-1.
GXO Logistics Supply Chain, Inc.	260	Thrasio, LLC	\$385,801.15	The Trust is advised by the Reorganized Debtors that the Claim was satisfied by cure payment made in connection with the assumption of claimant's contract. <i>See</i> Docket No. 1103, Exh A-1.

Schedule 5

Equity Claims

Claimant	Claim No.	Debtor	Asserted Claim Priority	Claim Amount	Reason for Disallowance
Blitzer, David	45	Thrasio Holdings, Inc.	General Unsecured	\$250,000.00	Claimant lists “holder of preferred shares” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Bregante, Scott	128	Thrasio Holdings, Inc.	General Unsecured	\$65,905.00	Claimant lists “stock options” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Cherucheril, Steven	51	Thrasio Holdings, Inc.	General Unsecured	\$6,633.85	Claimant lists “state of the purchases of stock options” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Dasgupta, Indrajeet	31	Thrasio Holdings, Inc.	General Unsecured	\$70,000.00	Claimant lists “1000 shares not realized” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.

Claimant	Claim No.	Debtor	Asserted Claim Priority	Claim Amount	Reason for Disallowance
Golob, Katherine	50	Thrasio Holdings, Inc.	General Unsecured	\$6,164.02	Claimant lists “Thrasio Holdings, Inc. Common shares grant CS-707 issued on 01/01/2022” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Laraqui, Meya	77	Thrasio Holdings, Inc.	General Unsecured	\$18,966.38	Claimant lists “exercise of an incentive stock option” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Othman, Suad	60	Thrasio Holdings, Inc.	General Unsecured	\$5,522.00	Claimant lists “shares purchased” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Oyomi, Joseph	34	Thrasio Holdings, Inc.	General Unsecured	\$24,500.00	Claimant asserts a claim of \$24,500.00 based on claimant’s status as an alleged holder of shares or stock options against the Debtors, but the documentation attached to the proof of claim does not include any supporting documentation entitling claimant to a general unsecured claim. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Puraj, Damir	38	Thrasio Holdings, Inc.	General Unsecured	\$8,952.80	Claimant lists “incentive stock option” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.

Claimant	Claim No.	Debtor	Asserted Claim Priority	Claim Amount	Reason for Disallowance
Reid, Erica	122	Thrasio Holdings, Inc.	General Unsecured	\$32,952.50	Claimant lists “stock options” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Reid, Nathan	126	Thrasio Holdings, Inc.	General Unsecured	\$65,905.00	Claimant lists “stock options” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Warkentin, Nicholas	124	Thrasio Holdings, Inc.	General Unsecured	\$2,380.00	Claimant lists “RSUs” as the basis of the Claim in Box 8 of the applicable Proof of Claim form, which is commonly understood to refer to restricted stock units, and the Trust’s understanding is further supported by the claimant’s supporting documentation. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan.
Weinraub, Elias	159	Thrasio Holdings, Inc.	General Unsecured	\$4,712.50	Claimant lists “shares owned” as the basis of the Claim in Box 8 of the applicable Proof of Claim form. The ownership of an equity security in any debtor entity is not a “claim” within the meaning of section 101(5) of the Bankruptcy Code. Further, pursuant to the Plan, all equity interests in the Debtors were deemed cancelled and extinguished as of the Effective Date and do not receive a recovery under the Plan. In addition, this Claim was also included on Schedule 1 as a Late-Filed Claim.