Docket #0454 Date Filed: 07/02/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	)	Chapter 11
CUMULUS MEDIA INC., *et al.*,[1]	)	Case No. 26-90346 (ARP)
Debtors.	)	(Jointly Administered)

DEBTORS' MOTION FOR ENTRY OF AN ORDER EXTENDING THEIR EXCLUSIVE PERIODS TO FILE AND SOLICIT A PLAN

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

The above-captioned debtors and debtors in possession (collectively, the "Debtors") state the following in support of this motion:

Preliminary Statement[2]

1. The Debtors' chapter 11 cases are steadily progressing towards conclusion. Throughout these cases, the Debtors have worked diligently to implement a comprehensive balance sheet restructuring premised on their restructuring support agreement, while utilizing chapter 11 to maximize value for all stakeholders. To that end, the Debtors filed initial versions of the Plan and Disclosure Statement on March 5, 2026. Prior to such filings, the Debtors commenced solicitation of their prepackaged Plan. On March 25, 2026, the Court entered the

[1] A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at www.veritaglobal.net/cumulusmedia. The Debtors' service address for purposes of these chapter 11 cases is: 780 Johnson Ferry Road, N.E., Suite 500, Atlanta, Georgia 30342.

[2] Capitalized terms used in the Preliminary Statement have the meanings ascribed to them in the remainder of the motion.

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Final Cash Collateral Order, authorizing the Debtors' use of Cash Collateral on a final basis and providing the financial and operational stability necessary to fund the administration of these chapter 11 cases and advance the Debtors' restructuring [Docket No. 155]. The Debtors then proceeded to seek approval of the Disclosure Statement and confirmation of the Plan at the combined hearing held on April 15, 2026 (the "Combined Hearing"), and shortly thereafter the Court entered the Confirmation Order [Docket No. 243].

2. Since the Combined Hearing, the Debtors have worked expeditiously toward consummation of the Plan and their emergence from these chapter 11 cases. The Debtors' emergence, however, remains subject to receipt of FCC Approval in respect of the FCC Long Form Application, which is a condition precedent to consummation of the Plan. The Debtors, working together with their stakeholders, have diligently prosecuted the FCC Long Form Application. While timing for the FCC Approval is, in significant part, outside of the Debtors' control, the Debtors expect to consummate the Plan and emerge promptly upon receipt of FCC Approval.

3. Accordingly, out of an abundance of caution and to preserve the status quo and the broad consensus embodied in the confirmed Plan, the Debtors seek a 120-day extension of the Exclusive Filing Period and Exclusive Solicitation Period, through and including October 30, 2026, and December 29, 2026, respectively.

4. The requested extension of the Debtors' Exclusive Periods to October 30, 2026, and December 29, 2026, as applicable, is appropriate given, among other things, the milestones the Debtors have achieved to date, including confirmation of the Plan, and the size and complexity of these chapter 11 cases, as discussed in further detail below. Further, the requested extension of the Debtors' Exclusive Periods will not prejudice any parties in interest given that

the Plan has already been confirmed and all stakeholders will benefit from the continued stability and predictability that comes with the Debtors maintaining exclusivity through their emergence from these chapter 11 cases.

5. For all these reasons and those set forth below, the Debtors submit that sufficient "cause" exists under section 1121 of the Bankruptcy Code to extend the Debtors' Exclusive Periods.

Relief Requested

6. The Debtors seek entry of an order, substantially in the form attached hereto (the "Order"), (a) extending by 120 days the period during which the Debtors have the exclusive right to file a chapter 11 plan (the "Exclusive Filing Period"), through and including October 30, 2026,[3] and the period during which the Debtors have the exclusive right to solicit acceptances of a chapter 11 plan filed during the Exclusive Filing Period (the "Exclusive Solicitation Period" and, together with the Exclusive Filing Period, the "Exclusive Periods"), through and including December 29, 2026, without prejudice to the Debtors' right to seek further extensions, and (b) granting related relief.[4]

Jurisdiction and Venue

7. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a

[3] While the Debtors have benefitted from the automatic extension of the Exclusive Filing Period from July 2, 2026 to August 31, 2026 pursuant to section 1121(c)(3) of the Bankruptcy Code, the Debtors having timely filed a Plan that has been accepted by each impaired Class, this motion requests 120-day extensions of the initial Exclusive Periods prior to such automatic extension (i.e., July 2, 2026, for the Exclusive Filing Period and August 31, 2026, for the Exclusive Solicitation Period).

[4] Pursuant to Section K, paragraph 30 of the Procedures for Complex Cases in the Southern District of Texas (the "Complex Case Procedures"), the filing of this motion automatically extends the Exclusive Periods until the Court (as defined herein) rules on the motion.

core proceeding within the meaning of 28 U.S.C. § 157(b). The Debtors confirm their consent to the entry of a final order by the Court.

8. Venue is proper pursuant to 28 U.S.C. § 1408.

9. The basis for relief requested herein is section 1121 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the "Bankruptcy Code").

Background

10. On March 4, 2026 (the "Petition Date"), the Debtors commenced filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. On March 5, 2026, the Court entered an order authorizing the joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b) and Bankruptcy Local Rule 1015-1 [Docket No. 17]. The Debtors are operating their business and managing their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in these chapter 11 cases, and no official committees have been appointed or designated.

11. A detailed description of the Debtors and their business, including the facts and circumstances giving rise to the Debtors' chapter 11 cases, is set forth in the *Declaration of Francisco J. Lopez-Balboa in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 15] (the "First Day Declaration").

12. On March 4, 2026, the Debtors commenced solicitation of votes to accept the *Joint Prepackaged Chapter 11 Plan of Reorganization of Cumulus Media Inc. and Its Debtor Affiliates* [Docket No. 20] (as modified, amended, or supplemented from time to time, the "Plan")[5] and distributed the *Disclosure Statement for the Joint Prepackaged Chapter 11 Plan*

[5] The Debtors filed the *Modified Joint Prepackaged Chapter 11 Plan of Reorganization of Cumulus Media Inc. and Its Debtor Affiliates* on April 13, 2026 [Docket No. 225].

of Reorganization of Cumulus Media Inc. and Its Debtor Affiliates [Docket No. 21] (as modified, amended, or supplemented from time to time, the "Disclosure Statement"). On March 5, 2026, the Court entered the *Order (I) Scheduling Combined Hearing on (A) Adequacy of Disclosure Statement and (B) Confirmation of the Plan; (II) Conditionally Approving Disclosure Statement; (III) Approving Solicitation Procedures and Form and Manner of Notice of Commencement, Combined Hearing, and Objection Deadline; (IV) Fixing Deadline to Object to the Disclosure Statement and Plan; (V) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases; (VI) Conditionally (A) Directing the United States Trustee Not to Convene Section 341 Meeting of Creditors and (B) Waiving Requirement of Filing Statements of Financial Affairs, Schedules of Assets and Liabilities, and 2015.3 Reports; and (VII) Granting Related Relief* [Docket No. 62] (the "Scheduling Order"), pursuant to which, among other things, the Court conditionally approved the adequacy of the Disclosure Statement. Pursuant to, and in accordance with, the Scheduling Order, the Debtors continued their solicitation and tabulation of votes on the Plan on a post-petition basis.[6]

13. On April 15, 2026, the Court held the Combined Hearing on confirmation of the Plan and final approval of the Disclosure Statement. Following the Combined Hearing, the Court entered the *Findings of Fact, Conclusions of Law, and Order (I) Approving the Debtors' Disclosure Statement on a Final Basis and (II) Confirming the Modified Joint Prepackaged Chapter 11 Plan of Reorganization of Cumulus Media Inc. and Its Debtor Affiliates* [Docket No. 243] (the "Confirmation Order"), confirming the Plan and approving the Disclosure Statement on a final basis.

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[6] *See Certificate of Service* [Docket No. 41]; *Certificate of Service* [Docket No. 142]; *Declaration of Darlene S. Calderon Regarding the Solicitation and Tabulation of Votes Cast on the Joint Prepackaged Chapter 11 Plan of Reorganization of Cumulus Media Inc. and Its Debtor Affiliates* [Docket No. 219].

Basis for Relief

I. The Debtors' Exclusive Periods Should be Extended

A. Section 1121(d) of the Bankruptcy Code Permits the Court to Extend the Exclusive Periods "for Cause"

14. Section 1121(d) of the Bankruptcy Code allows the Court to extend the Exclusive Periods for "cause." 11 U.S.C. § 1121(d). Although the Bankruptcy Code does not define "cause" for the purposes of an extension request under section 1121(d), the legislative history of section 1121 indicates that Congress did not intend that the 120- and 180-day exclusive periods be strict limits. *See* H.R. Rep. No. 95–595, at 231–32 (1978), *reprinted in* 1978 U.S.C.C.A.N. 5963 (noting that Congress intended to give Bankruptcy Courts flexibility to protect a debtor's interests by allowing a debtor an unimpeded opportunity to negotiate settlement of debts without interference from other parties in interest); *see also In re Timbers of Inwood Forest Assoc., Ltd.*, 808 F.2d 363, 372 (5th Cir. 1987) ("Any bankruptcy court involved in an assessment of whether 'cause' exists should be mindful of the legislative goal behind § 1121.").

15. The decision to extend the Exclusive Periods is left to the sound discretion of the Court and should be based upon the facts and circumstances of these chapter 11 cases. *In re Adelphia Commc'ns Corp.*, 352 B.R. 578, 587 (Bankr. S.D.N.Y. 2006) (identifying factors courts consider in determining whether to extend exclusivity); *In re New Millennium Mgmt., LLC*, No. 13-35719-H3-11, 2014 WL 792115, at *6 (Bankr. S.D. Tex. Feb. 25, 2014) (identifying the *Adelphia* factors as factors to consider in determining whether cause exists to extend exclusivity); *In re Express One Int'l, Inc.*, 194 B.R. 98, 100 (Bankr. E.D. Tex. 1996) (same); *In re Washington-St. Tammany Elec. Coop., Inc.*, 97 B.R. 852, 854 (E.D. La. 1989) (noting that the decision to extend exclusivity "rests with the discretion of the Court"). In making the

determination to affirm or deny a request to extend the Exclusive Periods for "cause," courts have considered a variety of factors, including the following:

a. the size and complexity of the debtor's case;

b. the necessity for sufficient time to permit the debtor to negotiate a chapter 11 plan and prepare adequate information;

c. the existence of good faith progress towards reorganization;

d. the fact that the debtor is paying its bills as they become due;

e. whether the debtor has demonstrated reasonable prospects for filing a viable plan;

f. whether the debtor had made progress in negotiations with its creditors;

g. the amount of time which has elapsed in the case;

h. whether the debtor is seeking an extension of exclusivity in order to pressure creditors to submit to the debtor's reorganization demands; and

i. whether an unresolved contingency exists.

See, *e.g.*, *Millennium Mgmt.*, 2014 WL 792115, at *6; *see also In re Express One Int.'l., Inc.*, 194 B.R. 98, 100 (Bankr. E.D. Tex. 1996) (noting the nine factors listed above "have been identified by courts as being relevant in determining whether 'cause' exists"); *Adelphia*, 352 B.R. at 587 (same); *see also In re Borders Grp., Inc.*, 460 B.R. 818, 822 (Bankr. S.D.N.Y. 2011) (evaluating the nine factors set forth in *Adelphia* to hold that debtor established cause to extend exclusivity).

16. Not all factors are relevant to every case, and courts tend to use a relevant subset of the above factors in determining whether cause exists to grant an exclusivity extension in a particular chapter 11 case. *See, e.g.*, *Express One Int'l.*, 194 B.R. at 100 (identifying four of the factors as relevant in determining whether "cause" existed to extend exclusivity); *Hoffinger Indus.*, 292 B.R. 639, 644 (B.A.P. 8th Cir. 2003) ("It is within the discretion of the bankruptcy court to decide which factors are relevant and give the appropriate weight to each."); *In re Serv.*

Merch. Co., Inc., 256 B.R. 744, 751–54 (Bankr. M.D. Tenn. 2000) (finding cause to extend where the debtors established six of the aforementioned factors); *see also In re Mirant Corp.*, No. 4-040-CV-0476-A, 2004 WL 2250986, at *2 (N.D. Tex. Sept. 30, 2004) (noting that an extension of exclusivity is typically granted where "the debtor showed substantial progress had been made in negotiations toward reorganization"); *In re Dow Corning Corp.*, 208 B.R. 661, 670 (Bankr. E.D. Mich. 1997) ("When the Court is determining whether to terminate a debtor's exclusivity, the primary consideration should be whether or not doing so would facilitate moving the case forward. And that is a practical call that can override a mere toting up of the factors.").

17. As set forth above, the Debtors are seeking an extension of the Exclusive Periods out of an abundance of caution, as the Plan has been confirmed. The Debtors seek to ensure an orderly and efficient emergence process, as they await receipt of FCC Approval over the course of the coming months, by avoiding the potential distraction and confusion that would result from the filing of a competing plan by another party.

B. Cause Exists for an Extension of the Exclusive Periods in these Chapter 11 Cases

1. These Chapter 11 Cases are Large and Complex

18. The scale and complexity of the Debtors' businesses and corporate structure require the Debtors to navigate complex issues in their reorganization efforts. This factor alone largely justifies the requested extension of the Exclusive Periods. The size and complexity of the case, by itself, can support a determination that cause exists for an extension of exclusivity. *See In re Express One Int'l, Inc.*, 194 B.R. 98, 100 (Bankr. E.D. Tex. 1996) (noting that the traditional ground for cause is the large size of the debtor and the difficulty in formulating a plan); *In re Texaco Inc.*, 76 B.R. 322, 326 (Bankr. S.D.N.Y. 1987) ("The large size of a debtor and the consequent difficulty in formulating a plan of reorganization for a huge debtor with a

complex financial structure are important factors which generally constitute cause for extending the exclusivity periods."). The legislative history of section 1121 states that "if an unusually large company were to seek reorganization under chapter 11, the court would probably need to extend the time in order to allow the debtor to reach an agreement." H.R. Rep. No. 95-595, at 232 (1978), *reprinted in* 1978 U.S.C.C.A.N. 5963. Additionally, "[t]he large size of a debtor and the consequent difficulty in formulating a plan . . . for a huge debtor with a complex financial structure are important factors which generally constitute cause for extending the exclusivity periods." *Texaco*, 76. B.R. at 326; *see also In re Express One Int'l, Inc.*, 194 B.R. at 100.

19. The Debtors consist of 41 entities that, as of the Petition Date, employed approximately 3,000 people, operated 394 owned-and-operated radio stations across 84 markets, and were obligated on approximately $697.1 million in aggregate principal amount of prepetition funded debt. In connection with these prepackaged chapter 11 cases, the Debtors have been (and remain) engaged with a variety of key stakeholders, including the Ad Hoc Group and the ABL Agent, as well as key vendors and other contractual counterparties, regarding a variety of matters that have impacted or will impact the Debtors' overall restructuring and the consummation of their confirmed Plan. The Debtors dedicated substantial time and resources, both before and after the Petition Date, to negotiating and implementing a fully consensual restructuring, including entering into the Restructuring Support Agreement, confirming the Plan, and satisfying the conditions precedent to the Effective Date (including pursuit of the FCC approvals necessary to effectuate the Restructuring Transactions). The size and complexity of these chapter 11 cases, along with the breadth and depth of the financial, regulatory, and legal issues involved therein, warrant the requested extension of the Exclusive Periods.

2. The Debtors Have Made Substantial Progress in Good Faith Negotiations with Their Creditors and Administering these Chapter 11 Cases

20. Since the Petition Date, the Debtors have made significant progress in negotiating with key stakeholders and administering these chapter 11 cases, which also warrants an extension of the Exclusive Periods. Since the Petition Date, the Debtors have:

a. obtained critical financial and operational relief;

b. addressed multiple issues with vendors, customers, and landlords to maintain operations and preserve value;

c. rejected unexpired leases for non-residential real property;

d. filed the Plan and Disclosure Statement, obtained conditional approval of the Disclosure Statement, and solicited votes on the Plan;

e. negotiated modifications to the Plan with key stakeholders;

f. obtained confirmation of the Plan and final approval of the Disclosure Statement through the Court's entry of the Confirmation Order; and

g. negotiated the terms of the Definitive Documents and pursued prosecution of the FCC Long Form Application.

21. This material, good faith progress towards a successful conclusion of these chapter 11 cases further warrants an extension of the Exclusive Periods.

3. An Extension of the Exclusive Periods Will Not Prejudice or Pressure Creditors

22. Since the Petition Date, the Debtors have worked constructively with all parties in interest by, among other things, providing due diligence to ensure that all their creditor constituencies were fully informed for purposes of engaging in plan discussions, and have consistently attempted in good faith to build consensus among all parties in interest.

23. It is appropriate for the Court to extend the Exclusive Periods to allow the Debtors a full and fair opportunity to consummate the Plan without the risk of the Debtors' loss of

exclusivity or the distraction of competing chapter 11 plan proposals. On this basis alone, the requested exclusivity extension is warranted. *See Adelphia*, 352 B.R. at 588 (viewing the good faith progress factor "as one of the more important factors" in the analysis).

4. The Debtors are Paying Their Bills as They Come Due

24. The Debtors have paid their post-petition debts in the ordinary course of business or as otherwise provided by Court order, continue to monitor their liquidity closely, and are confident that sufficient funding will be available through the Effective Date.

5. Relatively Little Time has Elapsed in the Chapter 11 Cases

25. Given the size and complexity of these chapter 11 cases, a relatively short amount of time has elapsed since the Petition Date. The Debtors are requesting the Exclusive Periods extension—which is the first such extension requested in these cases—out of an abundance of caution to facilitate consummation of the Plan free of the distraction and delay a competing plan may cause, to the detriment of all stakeholders.

6. An Extension of the Exclusive Periods is in the Best Interest of All Parties In Interest

26. The Debtors seek to maintain exclusivity so parties with competing interests do not impede the Debtors' efforts to effectuate a value-maximizing restructuring. Extending exclusivity benefits all parties in interest by preventing the drain on time and the resources of the Debtors' estates that will occur when multiple parties, with potentially diverging interests, pursue the consideration of their own respective plans. All stakeholders in these chapter 11 cases benefit from continued stability and predictability that a centralized process provides, which can only occur while the Debtors remain the sole plan proponents. Additionally, even if the Court approves an extension of the Exclusive Periods, nothing prevents parties in interest from

later arguing to the Court that cause supports termination of the Debtors' exclusivity, should such cause arise.

27. For all these reasons, the Debtors respectfully submit that cause exists to extend the Exclusive Periods pursuant to section 1121(d) of the Bankruptcy Code, through and including October 30, 2026, and December 29, 2026, for the Exclusive Filing Period and Exclusive Solicitation Period, respectively, without prejudice to the Debtors' right to seek further extensions of the Exclusive Periods, as may be appropriate under the circumstances.

Notice

28. The Debtors will provide notice of this motion to the following parties or their respective counsel: (a) the Office of the United States Trustee for the Southern District of Texas; (b) the holders of the 30 largest unsecured claims against the Debtors (on a consolidated basis); (c) Riemer & Braunstein LLP and FBT Gibbons LLP, co-counsel to the ABL Agent; (d) Gibson, Dunn & Crutcher LLP, counsel to the Ad Hoc Group; (e) counsel to the 2026 Trustee and the 2029 Trustee; (f) counsel to the 2026 Agent and the 2029 Agent; (g) the Internal Revenue Service; (h) the United States Securities and Exchange Commission; (i) the United States Attorney's Office for the Southern District of Texas; (j) the office of the attorney general for the states in which the Debtors operate; (k) the Federal Communications Commission; (l) other regulatory agencies having a regulatory or statutory interest in these cases; and (m) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

29. A copy of this motion is available on (a) PACER, at https://ecf.txsb.uscourts.gov/ and (b) the website maintained by the Debtors' claims and noticing agent, at www.veritaglobal.net/cumulusmedia.

[*Remainder of page intentionally left blank*]

WHEREFORE, the Debtors request that the Court enter the Order granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

July 2, 2026

Respectfully submitted,

By: */s/ John F. Higgins*

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Certificate of Service

I certify that on July 2 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ *John F. Higgins*
John F. Higgins

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	)	Chapter 11
	)	
CUMULUS MEDIA INC., *et al.*,[1]	)	Case No. 26-90346 (ARP)
	)	
	)	(Jointly Administered)
Debtors.	)	
	)	

ORDER EXTENDING DEBTORS' EXCLUSIVE PERIODS TO FILE AND SOLICIT A PLAN

Upon the motion (the "Motion")[2] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") extending the periods during which the Debtors have the exclusive rights to file a chapter 11 plan (the "Exclusive Filing Period") and solicit a chapter 11 plan filed during the Exclusive Filing Period (the "Exclusive Solicitation Period," and together with the Exclusive Filing Period, the "Exclusive Periods"), all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; 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 Motion in this district is proper pursuant to 28 U.S.C. § 1408; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed

[1] A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at www.veritaglobal.net/cumulusmedia. The Debtors' service address for purposes of these chapter 11 cases is: 780 Johnson Ferry Road, N.E., Suite 500, Atlanta, Georgia 30342.

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

the Motion and having heard the statements in support of the relief requested therein at a hearing, if any, before this Court; 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. Pursuant to section 1121(d) of the Bankruptcy Code, the Debtors' Exclusive Filing Period is extended through and including October 30, 2026.

2. Pursuant to section 1121(d) of the Bankruptcy Code, the Debtors' Exclusive Solicitation Period is extended through and including December 29, 2026.

3. The extensions of the Exclusive Periods granted herein are without prejudice to such further requests that may be made pursuant to section 1121(d) of the Bankruptcy Code by the Debtors or any party in interest, for cause shown, upon notice and a hearing.

4. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a), the Bankruptcy Local Rules, and the Procedures for Complex Cases of this Court are satisfied by such notice.

5. All time periods set forth in the Motion or Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

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

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

Dated: Houston, Texas

_____, 2026

THE HONORABLE ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE