Docket #0947 Date Filed: 10/08/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
F21 OPCO, LLC,[1]	Case No. 25-10469 (MFW)
Post-Effective Date Debtor.	**Related Docket No. 795**

CERTIFICATE OF NO OBJECTION REGARDING PLAN ADMINISTRATOR'S NINTH OMNIBUS (SUBSTANTIVE) OBJECTION TO (I) RECLASSIFIED CLAIMS; (II) NO LIABILITY CLAIMS AND (III) REDUCED CLAIMS

The undersigned counsel to Steven Balasiano of MHR Advisory Group, LLC, not individually, but solely in his capacity as the Plan Administrator (the "Plan Administrator"), hereby certifies as follows:

1. On September 16, 2026, the Plan Administrator filed the *Plan Administrator's Ninth Omnibus (Substantive) Objection to (I) Reclassified Claims; (II) No Liability Claims; and (III) Reduced Claims* [Docket No. 795] (the "Objection").[2] Attached to the Objection was a proposed form of order (together with the exhibits thereto the "Proposed Order") granting the Objection.

2. Pursuant to the notice of Objection, responses to the Objection were required to have been filed with the Court and served no later than 4:00 p.m. (ET) on October 7, 2026. The notice of Objection also provided notice that a hearing on the Objection was scheduled for October 14, 2026 at 10:30 a.m. (ET).

[1] The Post-Effective Date Debtor's service address is c/o MHR Advisory Group, LLC, 6701 Bay Parkway, 3rd Floor, Brooklyn, New York 11204, Attn: Steven Balasiano. On December 15, 2025, the Court entered a final decree closing the chapter 11 cases of F21 Puerto Rico, LLC, Case No. 25-10470 and Debtor F21 GiftCo Management, LLC, Case No. 25-10471.

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

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3. The Plan Administrator did not receive any informal responses, and no responses were filed on the docket.

WHEREFORE, the Plan Administrator respectfully requests that the Court enter the Proposed Order attached to the Objection at the earliest convenience of the Court.

Dated: October 8, 2026

COLE SCHOTZ P.C.

/s/ Jack M. Dougherty

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