UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:	)	Chapter 11
	)	
OTB HOLDING LLC,[1]	)	Case No. 25-52415 (SMS)
	)	
Debtor.	)	**Hearing Date: June 17, 2026**
	)	**Obj. Deadline: June 4, 2026**
	)	

NOTICE OF THE LIQUIDATING TRUSTEE'S FIFTH OMNIBUS OBJECTION TO CERTAIN SATISFIED CLAIMS (EXHIBIT A), DEADLINE TO OBJECT AND HEARING

PLEASE TAKE NOTICE that META Advisors LLC, solely in its capacity as the liquidating trustee (the "Liquidating Trustee") of the OTB Holding Liquidating Trust (the "Liquidating Trust"), has filed the *Liquidating Trustee's Fifth Omnibus Objection to Certain Satisfied Claims (Exhibit A)* and related papers (the "Objection") with the Court seeking entry of an order sustaining the Objection and disallowing and expunging in their entirety the claims set forth on **Exhibit A** attached thereto. Pursuant to the Fifth Amended and Restated General Order No. 24-2018, the Court may consider this matter without further notice or a hearing if no party in interest files a response or objection within ***thirty (30) days*** from the date of service of this notice. **If you object to the relief requested in this pleading, you must timely file your objection with the Bankruptcy Clerk** at Room 1340, 75 Ted Turner Drive, S.W., Atlanta, GA 30303, and serve a copy on the movant's attorney, Nathaniel T. DeLoatch, Eversheds Sutherland (US) LLP, 600 Peachtree St., NE, Suite 5200, Atlanta, GA 30308, and any other appropriate persons by the objection deadline. The response or objection must explain your position and be actually received by the Bankruptcy Clerk within the required time.

A hearing on the pleading has been scheduled for June 17, 2026. The Court will hold a hearing on the **Objection** at **10:15 a.m. ET** on **June 17, 2026** in **Courtroom 1201, at the Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Drive, S.W., Atlanta, Georgia 30303**, which must be attended in person, unless the Court orders otherwise.

If an objection or response is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response or objection within the time permitted, the Court may grant the**

[1] The last four digits of the Debtor's federal tax identification number are 3213. A complete list of each of the former Debtors whose claims are being administered in this chapter 11 case may be obtained on the website of this Debtor's claims and noticing agent at https://www.veritaglobal.net/ontheborder. The mailing address for the Liquidating Trust established pursuant to the Plan and Confirmation Order (each as defined herein) is c/o META Advisors LLC, 7 Giralda Farms, Suite 340, Madison, New Jersey 07940, Attn: James S. Carr, Kristin S. Elliott and Dana P. Kane, with a copy to: Eversheds Sutherland (US) LLP, 999 Peachtree Street NE, Atlanta, Georgia 30309, Attn: Todd C. Meyers, Email: toddmeyers@eversheds-sutherland.com, and Nathaniel T. DeLoatch, Email: natedeloatch@eversheds-sutherland.com.

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relief requested without further notice and without holding the scheduled hearing provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no objection is timely filed, but no order is entered granting the relief requested at least one business day prior to the scheduled hearing, the hearing will be held as scheduled.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Dated: May 5, 2026

EVERSHEDS SUTHERLAND (US) LLP

/s/Nathaniel T. DeLoatch

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Counsel to the Liquidating Trustee of the OTB Holding Liquidating Trust

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
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In re:	)	Chapter 11
	)	
OTB HOLDING LLC,[1]	)	Case No. 25-52415 (SMS)
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Debtor.	)	**Hearing Date: June 17, 2026**
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THE LIQUIDATING TRUSTEE'S FIFTH OMNIBUS OBJECTION TO CERTAIN SATISFIED CLAIMS (EXHIBIT A)

PLEASE CAREFULLY REVIEW THIS OBJECTION AND PLEASE REVIEW EXHIBIT A ATTACHED HERETO TO LOCATE YOUR NAME AND CLAIM(S).

THIS IS AN OBJECTION TO YOUR CLAIM. SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION THAT MAY BE FILED. PLEASE BE AWARE THAT THE LIQUIDATING TRUSTEE IS ASKING THE COURT TO DISALLOW CERTAIN OF THE CLAIMS THAT YOU FILED IN THESE CHAPTER 11 CASES.

TO THE EXTENT YOU DISAGREE WITH THE RELIEF SOUGHT IN THE OBJECTION, YOU SHOULD IMMEDIATELY CONTACT THE LIQUIDATING TRUSTEE TO RESOLVE THE DISPUTE. IF YOU DO NOT REACH AN AGREEMENT, YOU MUST FILE A RESPONSE TO THIS OBJECTION AND SEND A COPY OF YOUR RESPONSE TO THE LIQUIDATING TRUSTEE AND ITS COUNSEL BY JUNE 4, 2026 (PREVAILING EASTERN TIME). YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT FILE A RESPONSE BY JUNE 4, 2026 (PREVAILING EASTERN TIME), YOUR CLAIM MAY BE DISALLOWED, EXPUNGED, OR ELIMINATED WITHOUT FURTHER NOTICE OR HEARING.

THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE LIQUIDATING TRUSTEE'S OR ANY PARTY IN INTEREST'S RIGHTS TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED ON EXHIBIT A.

[1] The last four digits of the Debtor's federal tax identification number are 3213. A complete list of each of the former Debtors whose claims are being administered in this chapter 11 case may be obtained on the website of this Debtor's claims and noticing agent at https://www.veritaglobal.net/ontheborder. The mailing address for the Liquidating Trust established pursuant to the Plan and Confirmation Order (each as defined herein) is c/o META Advisors LLC, 7 Giralda Farms, Suite 340, Madison, New Jersey 07940, Attn: James S. Carr, Kristin S. Elliott and Dana P. Kane, with a copy to: Eversheds Sutherland (US) LLP, 999 Peachtree Street NE, Atlanta, Georgia 30309, Attn: Todd C. Meyers, Email: toddmeyers@eversheds-sutherland.com, and Nathaniel T. DeLoatch, Email: natedeloatch@eversheds-sutherland.com.

META Advisors LLC, solely in its capacity as the liquidating trustee (the "Liquidating Trustee") of the OTB Holding Liquidating Trust (the "Liquidating Trust") established pursuant to the *Debtors' Amended Joint Chapter 11 Plan as of July 21, 2025* [Docket No. 522] (as amended, supplemented, or modified, the "Plan"),[2] confirmed by the *Findings of Fact, Conclusions of Law, and Order Confirming the Debtors' Amended Joint Chapter 11 Plan as of July 21, 2025* [Docket No. 607] (the "Confirmation Order"), hereby submits this omnibus objection (the "Objection") requesting entry of an order, substantially in the form attached hereto as **Exhibit 1** (the "Proposed Order"), disallowing and expunging in their entirety the Claims listed on **Exhibit A** to the Proposed Order (the "Satisfied Claims"). In support of the Objection, the Liquidating Trustee respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the "Court") has jurisdiction over these cases and this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409(a).

2. The predicates for the relief requested herein are sections 105 and 502 of 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the "Local Rules"), the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases,* dated February 6, 2023, and the *Order Pursuant to 11 U.S.C. § 105(a) and Rule 3007 of the Federal Rules of*

[2] Terms capitalized but not otherwise defined herein shall have the meaning ascribed in the Plan.

Bankruptcy Procedure Authorizing the Filing of Omnibus Claims Objections on Certain Additional Grounds [Docket No. 514] (the "Omnibus Objection Order").

BACKGROUND

3. On March 4, 2025 (the "Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the Court (collectively, the "Chapter 11 Cases"). The Debtors are the Post-confirmation Debtors, as set forth in the Plan.

4. Additional information about the Debtors' business and events leading up to the Petition Date can be found in the *Declaration of Jonathan M. Tibus in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 18] filed on March 5, 2025 and is incorporated herein by reference.

5. On July 15, 2025, the Court entered the Omnibus Objection Order providing that, among other things, the Liquidating Trustee could, in addition to the grounds provided in Bankruptcy Rule 3007(d), assert numerous additional grounds as a basis for objecting to a Claim, including the satisfaction, in whole or in part, of a Claim by a party other than the Debtors. Omnibus Objection Order ¶ 2.i.

6. On July 21, 2025, the Debtors filed the Plan. On September 8, 2025, the Court confirmed the Plan, which created and established the Liquidating Trust and granted, among other things, exclusive authority to the Liquidating Trustee to object to, compromise, settle, or otherwise resolve all Claims asserted against the Debtors. *See* Confirmation Order ¶ 21; Plan §§ 7.05, 8.05. Consequently, the Liquidating Trustee has standing to bring this Objection. *See id.*

7. The Plan went into effect in accordance with its terms on September 16, 2025 [*see* Docket No. 620] (the "Notice of Effective Date").

8. The Liquidating Trustee has reviewed certain of the Claims filed in these Chapter 11 Cases, including supporting documentation filed and/or provided with respect thereto. For the

reasons set forth in more detail below, the Liquidating Trustee has determined that the Satisfied Claims filed in these Chapter 11 Cases are objectionable. Thus, the Liquidating Trustee files this Objection in accordance with the applicable provisions of the Plan, Bankruptcy Code, Bankruptcy Rules, Local Rules, and the Omnibus Objection Order.

BASIS FOR RELIEF REQUESTED AND APPLICABLE AUTHORITY

9. 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." 11 U.S.C. § 502(a). Once an objection to a claim is filed, the court, after notice and a hearing, shall determine the allowed amount of the claim. *See* 11 U.S.C. § 502(b). 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. *In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. Fed. R. Bankr. P. 3001(f); *In re Allegheny Int'l Inc.*, 954 F.2d at 173.

10. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim's *prima facie* validity. *In re Allegheny Int'l Inc.*, 954 F.2d at 173–74. In practice, the objecting party must produce evidence that would refute at least one of the allegations essential to the claim's legal sufficiency. *Id.* Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id.*; *see also Dollinger v. BV Retail, LLC (In re S&Q Shack, LLC)*, Nos. 09-67151-MGD, 09-68410-MGD, 2015 Bankr. LEXIS 1166, at *6-7 (Bankr. N.D. Ga. Feb. 13, 2015). Despite this shifting burden, the ultimate burden of persuasion is always on the claimant. *See In re Moss*, No. 94-11959, 1995 WL 17005342, at *1 (Bankr. S.D. Ga. Sept. 28, 1995).

11. The Liquidating Trustee has the duty to object to the allowance of any improper Claim pursuant to the Plan and Confirmation Order. *See* Confirmation Order ¶ 21; Plan §§ 7.05, 8.05; *see also Int'l Yacht & Tennis, Inc. v. Wasserman Tennis, Inc. (In re Int'l Yacht & Tennis, Inc.)*, 922 F.2d 659, 661-62 (11th Cir. 1991).

12. Therefore, the Liquidating Trustee objects to the Satisfied Claims and requests that this Court disallow and expunge the Satisfied Claims as set forth below.

A. The Satisfied Claims (Exhibit A): Disallowance and Expungement of the Satisfied Claims Is Appropriate Under Applicable Law and the Omnibus Objection Order.

13. Section 502 of the Bankruptcy Code provides that a claim must be disallowed to the extent that "such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured." 11 U.S.C. § 502(b)(1). A claim that has been paid in full is no longer enforceable and must be disallowed. *In re O'Neil*, 140 B.R. 263, 265 (N.D. Cal. 1992), *aff'd sub nom. O'Neil v. Carey*, 24 F.3d 248 (9th Cir. 1994) ("That a claim has already been paid is a valid ground for objection and disallowance."); *see also Kubota Tractor Corp. v. Nashville Tractor, Inc.,* No. 7:19-CV-189 (WLS), 2021 WL 5413667, at *2 (M.D. Ga. Jan. 22, 2021) ("Double recoveries are impermissible under Georgia Law."). Moreover, a ground for objection exists where "Claim is satisfied by payment in full or in part on account of such Claim from a party that is not a Debtor[.]" Omnibus Objection Order ¶ 2.i.

14. Based upon a review and investigation of the Satisfied Claims, the Liquidating Trustee has determined that the Satisfied Claims were satisfied by parties other than the Debtors or the Liquidating Trust and, thus, are subject to disallowance and expungement under applicable law and the Omnibus Objection Order. Therefore, the Liquidating Trustee objects to the Satisfied

Claims and requests that this Court disallow and expunge the Satisfied Claims listed on **Exhibit A** in their entirety.

SEPARATE CONTESTED MATTERS

15. A response to the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Liquidating Trustee requests that any response, and any order entered by the Court with respect to such response, shall be deemed a separate order with respect to a Claim that is listed on **Exhibit A**.

RESERVATION OF RIGHTS

16. The Liquidating Trustee expressly reserves the right to amend, modify or supplement this Objection and to file additional objections to the Satisfied Claims or any other Claims (filed or not) which may be asserted against the Debtors and/or the Liquidating Trust. Should this Objection be dismissed, the Liquidating Trustee reserves the right to object on other grounds or on any other grounds that the Liquidating Trustee discovers during the pendency of these Chapter 11 Cases.

NOTICE

17. The Liquidating Trustee will provide notice of this Objection to (a) each claimant set forth on **Exhibit A** and their counsel, where applicable, (b) the Wind-Down Officer and its counsel, and (c) the United States Trustee. The Liquidating Trustee respectfully submits that such notice is sufficient and proper under the circumstances and that no other or further notice is required.

NO PRIOR REQUEST

18. No previous request for the relief sought herein has been made to this Court or any other court.

COMPLIANCE WITH LOCAL RULE 3007-1

19. To the best of the Liquidating Trustee's knowledge and belief, the Objection, including its exhibits, substantially complies with Local Rule 3007-1. To the extent that the Objection does not comply with the requirements of Local Rule 3007-1, the Liquidating Trustee submits that the deviations are not material and respectfully requests that those requirements be waived.

CONCLUSION

WHEREFORE, the Liquidating Trustee respectfully requests that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit 1** (a) disallowing and expunging the Satisfied Claims and (b) granting such other relief as the Court deems just, equitable, and proper.

[*Signature on next page*]

Date: May 5, 2026

Respectfully submitted,

EVERSHEDS SUTHERLAND (US) LLP

/s/Nathaniel T. DeLoatch
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Counsel to the Liquidating Trustee of the OTB Holding Liquidating Trust

EXHIBIT 1

(Proposed Order)

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:	)	Chapter 11
	)	
OTB HOLDING LLC,[1]	)	Case No. 25-52415 (SMS)
	)	
Debtor.	)	
	)	
	)	
	)	

ORDER SUSTAINING THE LIQUIDATING TRUSTEE'S FIFTH OMNIBUS OBJECTION TO CERTAIN SATISFIED CLAIMS (EXHIBIT A)

This matter is before the Court on the *Liquidating Trustee's Fifth Omnibus Objection to Certain Satisfied Claims (Exhibit A)* and related papers [Docket No. [•]] (the "Objection"),[2] filed by the Liquidating Trustee requesting entry of an order disallowing and expunging the Satisfied Claims identified on **Exhibit A**, attached hereto, all as more fully set forth in the Objection.

The Court having jurisdiction over the Objection pursuant to 28 U.S.C. §§ 1334 and 157(b); the Objection being a core matter pursuant to 28 U.S.C. § 157(b)(2); the 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 the Court having found that the relief requested in the Objection is in the best interests of the Liquidating Trust, its beneficiaries, the Debtors, the Estates, and all other parties in interest; and the Court being able to enter a final order consistent with Article III of the United States Constitution; and the Liquidating Trustee having filed a notice setting the Objection and

[1] The last four digits of the Debtor's federal tax identification number are 3213. A complete list of each of the former Debtors whose claims are being administered in this chapter 11 case may be obtained on the website of this Debtor's claims and noticing agent at https://www.veritaglobal.net/ontheborder. The mailing address for the Liquidating Trust established pursuant to the Plan and Confirmation Order (each as defined herein) is c/o META Advisors LLC, 7 Giralda Farms, Suite 340, Madison, New Jersey 07940, Attn: James S. Carr, Kristin S. Elliott and Dana P. Kane, with a copy to: Eversheds Sutherland (US) LLP, 999 Peachtree Street NE, Atlanta, Georgia 30309, Attn: Todd C. Meyers, Email: toddmeyers@eversheds-sutherland.com, and Nathaniel T. DeLoatch, Email: natedeloatch@eversheds-sutherland.com.

[2] Capitalized terms not otherwise defined herein shall have the meaning set forth in the Objection.

any responses thereto for hearing on June 17, 2026; and the Court having found that notice of the opportunity to respond and for hearing was provided pursuant to the procedures in the Fifth Amended and Restated General Order No. 24-2018; and the Court having considered the Objection and all other matters of record, including the lack of response thereto; and based on the foregoing, no further notice or hearing is required and the Court finds that good cause exists to grant the relief requested in the Objection; and the Court having found that the relief requested in the Objection is in the best interests of the Liquidating Trust, its beneficiaries, the Debtors, the Estates, and all other parties in interest; and upon all of the proceedings had before the Court; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Objection is SUSTAINED and GRANTED as set forth herein.

2. The Satisfied Claims are disallowed and expunged as set forth on **Exhibit A**, attached hereto. All rights of the Liquidating Trustee to further object to Claims are reserved.

3. Each Satisfied Claim, and the Objection by the Liquidating Trustee to such Satisfied Claim, as addressed in the Objection and set forth on **Exhibit A** attached hereto, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each Satisfied Claim. Any stay of this Order pending appeal by any claimant whose Claim is subject to this Order shall only apply to the contested matter that involves such claimant's Claim and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters or Claims listed in the Objection or this Order.

4. The Liquidating Trustee is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

5. The Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or relating to the implementation of this Order.

6. Kurtzman Carson Consultants, LLC d/b/a Verita Global ("Verita") shall, within three (3) days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first-class mail, as applicable, on all parties served with the Objection, and Verita shall file promptly thereafter a certificate of service confirming such service.

[END OF ORDER]

Prepared and Presented by:

EVERSHEDS SUTHERLAND (US) LLP

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Counsel to the Liquidating Trustee
of the OTB Holding Liquidating Trust

EXHIBIT A

(Satisfied Claims)

#	Name of Claimant	Debtor	Claim #	Claim Amount	Claim Classification	Basis of Objection	Date Claim Paid	Amount Paid	Claim Payor
1	Aviana Company, Ltd.	OTB Acquisition LLC	508	$138,600.00	General Unsecured	Claim satisfied during the case by non-Debtor	7/1/2025	Paid in Full	OTB Hospitality, LLC
2	CASTLE PARK INC	OTB Acquisition LLC	453	$110,824.57	General Unsecured	Claim satisfied during the case by non-Debtor	NA	Paid in Full	OTB Hospitality, LLC
3	CrossFirst Bank	OTB Holding LLC	738	UNLIQUIDATED	Admin Priority	Claim satisfied during the case	10/27/2025 (Docket No. 661)	Paid in Full	CrossFirst/Liquidating Trust
4	EcoLab, Inc.	OTB Acquisition LLC	735	$81,192.18	Admin Priority	Claim satisfied during the case by non-Debtor	On or around 4/14/2026 (Docket No. 750)	Paid in Full	OTB Hospitality, LLC
5	Garden Road Capital Advisors LLC T/A Class Action Financial Settlements	OTB Holding LLC	247	UNLIQUIDATED	General Unsecured	Claim satisfied; underlying contracts assumed by non-Debtor	NA	Paid in Full	Claimant confirmed all contracts were assumed by OTB Hospitality, LLC and the POC can be disallowed