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: July 8, 2026**
	)	**Obj. Deadline: June 11, 2026**
	)	

NOTICE OF THE LIQUIDATING TRUSTEE'S EIGHTH OMNIBUS OBJECTION TO CERTAIN CLAIMS SET FORTH ON EXHIBITS A AND B, 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 Eighth Omnibus Objection to Certain Claims Set Forth on Exhibits A and B* and related papers (the "Objection") with the Court seeking entry of an order sustaining the Objection and reclassifying and/or disallowing, in whole or in part, the claims set forth on **Exhibits A and B** 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 July 8, 2026. The Court will hold a hearing on the **Objection** at **10:15 a.m. ET** on **July 8, 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] [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 12, 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: July 8, 2026**
	)	**Obj. Deadline: June 11, 2026**
	)	

THE LIQUIDATING TRUSTEE'S EIGHTH OMNIBUS OBJECTION TO CERTAIN CLAIMS SET FORTH ON EXHIBITS A AND B

PLEASE CAREFULLY REVIEW THIS OBJECTION AND PLEASE REVIEW EXHIBITS A AND B 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 RECLASSIFY, MODIFY, AND/OR 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 11, 2026 (PREVAILING EASTERN TIME). YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT FILE A RESPONSE BY JUNE 11, 2026 (PREVAILING EASTERN TIME), YOUR CLAIM MAY BE MODIFIED, 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 EXHIBITS A AND B.

[1] [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"), reclassifying and/or disallowing and expunging, in whole or in part, the Claims listed on **Exhibit A** (the "Non-Liability Claims") and **Exhibit B** (the "Bailey Claim"). 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 April 16, 2025, the Court entered its order [Docket No. 259] (the "Bar Date Order") establishing, among other things, May 29, 2025 at 5:00 p.m. (prevailing Eastern Time) as the last day for creditors that are not governmental units, and certain other exceptions that are not applicable here, to file a proof of claim or proof of interest (the "General Bar Date").

6. On May 16, 2025, the Court entered its order approving the sale of substantially all of the Debtors' assets to OTB Hospitality, LLC (the "Buyer") [Docket No. 403] (the "Sale Order"). The Sale Order approved the *Second Amended and Restated Asset Purchase Agreement*, dated May 6, 2025 [*see* Docket No. 350, Ex. A] (the "APA"), which, importantly, provides that, among other things, the Buyer is responsible for certain of the Debtors' liabilities ("Assumed Liabilities"). APA § 2.3.

7. 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. Omnibus Objection Order ¶ 2. These additional grounds include, but are not limited to: (a)

inconsistency with the Debtors' books and records; (b) improper classification; (c) a Claim seeking recovery for amounts for which the Debtors are not liable; (d) satisfaction of a Claim by a party other than the Debtors; (e) insufficient documentation; or (f) a Claim that is blank ((a) through (f) are, collectively, the "Additional Grounds"). Omnibus Objection Order ¶ 2.

8. 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.*

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

10. 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 Non-Liability Claims and the Bailey Claim 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

11. 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.

12. 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).

13. The Liquidating Trustee has the duty to object to the allowance of any claim that is improper. *See* 11 U.S.C. §§ 704(a)(5), 1106(a)(1) and 1107(a); *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).

14. Therefore, the Liquidating Trustee objects to the Non-Liability Claims and the Bailey Claim and requests that this Court reclassify and/or disallow and expunge, in whole or in part, the Non-Liability Claims and the Bailey Claim as set forth below.

A. <u>The Non-Liability Claims (Exhibit A): Reclassification and/or Disallowance and Expungement, in Whole or in Part, of the Non-Liability Claims Is Appropriate Under the Bankruptcy Code and the APA.</u>

15. As noted above, section 502 of the Bankruptcy Code provides that a claim shall 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). Moreover, the Additional Grounds expressly

permit the Liquidating Trustee to object to a Claim where the "Proof of Claim seeks recovery of amounts for which the Debtors are not liable[.]" Omnibus Objection Order ¶ 2.c.

16. Here, the Non-Liability Claims set forth on **Exhibit A** assert amounts for which the Debtors are not liable under the APA. Specifically, Assumed Liabilities under the APA include, but are not limited to:

a. "all liabilities as of the Closing with respect to trade payables uncured by Sellers in the Ordinary Course of Business and arising from and after the Petition Date;"

b. "all property Taxes that accrue on and after the Petition Date and prior to the Closing Date in connection with an Excluded Restaurant;" and

c. "all rent due and payable on account of any Excluded Restaurant that accrues on and after the Petition Date and prior to the Closing Date[.]"

APA § 2.3(e), (h), (j). The APA defines "Excluded Restaurants" as "any of the Sellers' restaurant locations that are not Continuing Restaurants." *Id*. at Art. 1.

17. Therefore, based upon a review and investigation of the Non-Liability Claims, the Liquidating Trustee has determined that the Non-Liability Claims are subject to reclassification and/or disallowance and expungement, in whole or in part, under the Bankruptcy Code, the Omnibus Objection Order, and the APA.

B. The Bailey Claim (Exhibit B): Disallowance and Expungement of the Bailey Claim Is Appropriate as a Late Filed and Blank Claim Under both the Bankruptcy Code, Bankruptcy Rules, and the Omnibus Objection Order.

18. Pursuant to section 502(b)(9) of the Bankruptcy Code, a claim shall be disallowed "to the extent that . . . [the] proof of such claim is not timely filed," except in certain circumstances that are not applicable here. 11 U.S.C. § 502(b)(9); *see also In re Hooker Inves. Inc.*, 937 F.2d 833, 840 (2d Cir. 1991) (enforcing the bar date and stating, *inter alia*, that "a bar date order does not function merely as a procedural gauntlet but as an integral part of the reorganization process") (internal quotation omitted). Additionally, pursuant to Bankruptcy Rule 3007(d), a debtor is

permitted to file an omnibus objection to more than one claim if the objection is based on enumerated grounds, including to claims that "were not timely filed . . . ." Fed. R. Bankr. P. 3007(d). Moreover, the Omnibus Objection Order permits the Liquidating Trustee to object to a Claim on the basis that the Proof of Claim does not specify an asserted amount. Omnibus Objection Order ¶ 2.

19. Here, the Bailey Claim set forth on **Exhibit B** was filed after the General Bar Date and fails to specify any amount whatsoever and is therefore subject to disallowance under the Bankruptcy Code, the Bankruptcy Rules, and the Omnibus Objection Order. Failure to disallow the Bailey Claim would result in the claimant receiving an unwarranted recovery to the detriment of creditors who filed Claims that comply with the Omnibus Objection Order.

20. Therefore, based upon a review and investigation of the Bailey Claim, the Liquidating Trustee objects to the Bailey Claim and requests that this Court disallow and expunge the Bailey Claim as set forth on **Exhibit B**.

SEPARATE CONTESTED MATTERS

21. 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 **Exhibits A and B**.

RESERVATION OF RIGHTS

22. The Liquidating Trustee expressly reserves the right to amend, modify or supplement this Objection and to file additional objections to the Non-Liability Claims, the Bailey Claim, 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

23. The Liquidating Trustee will provide notice of this Objection to (a) each claimant set forth on **Exhibits A and B** 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

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

COMPLIANCE WITH LOCAL RULE 3007-1

25. 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) reclassifying and/or disallowing and expunging the Non-Liability Claims and the Bailey Claim, in whole or in part, as set forth on **Exhibits A and B** and (b) granting such other relief as the Court deems just, equitable, and proper.

[*Signature on next page*]

Date: May 12, 2026

Respectfully submitted,

EVERSHEDS SUTHERLAND (US) LLP

/s/ Nathaniel T. DeLoatch
Todd C. Meyers (Ga. Bar No. 503756)
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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 EIGHTH OMNIBUS OBJECTION TO CERTAIN CLAIMS SET FORTH ON EXHIBITS A AND B

This matter is before the Court on the *Liquidating Trustee's Eighth Omnibus Objection to Certain Claims Set Forth on Exhibits A and B* and related papers [Docket No. [•]] (the "Objection"),[2] filed by the Liquidating Trustee requesting entry of an order reclassifying and/or disallowing and expunging, in whole or in part, the claims identified on **Exhibit A** (the "Non-Liability Claims") and **Exhibit B** (the "Bailey Claim"), 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

[1] [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.

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 any responses thereto for hearing on July 8, 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 Non-Liability Claims and the Bailey Claim are reclassified and/or disallowed and expunged as set forth on **Exhibits A and B**, attached hereto. All rights of the Liquidating Trustee to further object to Claims on any other grounds are reserved.

3. Each claim listed on **Exhibits A and B** attached hereto, and the Objection by the Liquidating Trustee thereto, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each such 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

(Non-Liability Claims)

#	Name of Claimant	Debtor	Claim #	Claim Amount & Classification	Modification	Reduced Claim Amount (If applicable)	Basis of Objection / Reason for Modification
1	Beltline/Airport Freeway, Ltd.	OTB Acquisition LLC	690	$2,858.25 (Admin. Priority)	Disallowance	Not Applicable	The Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.
2	BRE DDR BR Fairlane MI LLC	OTB Acquisition LLC	692	$924.77 (Admin. Priority)	Disallowance	Not Applicable	The Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.
3	Cintas Corporation No. 2	OTB Holding LLC	686	$61,991.24 (Admin. Priority)	Disallowance	Not Applicable	The Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.
4	COLE OB De Soto, TX LLC	OTB Acquisition LLC	688	$16,938.54 (Admin. Priority)	Disallowance	Not Applicable	The Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.
5	CONCORD MILLS RESIDUAL LIMITED PARTNERSHIP, A DELAWARE LIMITED PARTNERSHIP	OTB Acquisition LLC	504	$202.90 (Admin. Priority)	Disallowance	Not Applicable	The Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.

6	FOUNDATION CAPITAL RESOURCES INC	OTB Acquisition LLC	581	UNLIQUIDATED (Admin Priority)	Disallowance	Not Applicable	The Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.
7	KRG Towson Square, LLC	OTB Acquisition LLC	554	$24,436.81 (Admin. Priority)	Disallowance	Not Applicable	The Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.
8	Lewis Crossing, LLC	OTB Acquisition LLC	507	$52,304.60 (General Unsecured)	Reduction	$37,627.18 (General Unsecured)	Part of the Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.
9	NORTHEAST BORDER, LLC	OTB Acquisition LLC	492	$65,347.71 (General Unsecured)	Reduction	$45,673.13 (General Unsecured)	Part of the Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.
10	REFRIGERATION PLUS LLC	OTB Holding LLC	717	$8,814.55 (Admin. Priority)	Disallowance	Not Applicable	Part of the Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA. The remaining portion of the claim is properly reclassified as General Unsecured and is therefore filed after the applicable Claims Bar Date and is subject to disallowance as an untimely claim.
11	South Square, LLC	OTB Acquisition LLC	149	$27,619.47 (General Unsecured)	Reduction	$17,425.92 (General Unsecured)	Part of the Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.
12	Triad Development, LTD	OTB Holding LLC	233	$22,493.01 (General Unsecured)	Reduction	$15,720.92 (General Unsecured)	Part of the Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.

13	Vestis Services, LLC fka ARAMARK Uniform & Career Apparel, LLC	OTB Acquisition LLC	665	$43,053.95 (Admin. Priority)	Disallowance	Not Applicable	The Proof of Claim seeks recovery of amounts for which the Debtors are not liable pursuant to section 2.3 of the APA.

EXHIBIT B

(Bailey Claim)

#	Name of Claimant	Debtor	Claim #	Claim Amount & Classification	Modification Classification	Applicable Bar Date	Date Claim Filed	Reduced Claim Amount & Classification	Basis of Objection / Reason for Modification
1	Takelon Bailey	OTB Holding LLC	677	BLANK (General Unsecured)	Disallowance	5/29/2025	7/30/2025	Not Applicable	The Claim is (1) late filed and (2) blank and thus subject to disallowance pursuant to the Bankruptcy Code and the Omnibus Objection Order.