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: November 4, 2026**
	)	**Obj. Deadline: October 27, 2026**
	)	
	)	

NOTICE OF THE THIRD MOTION OF THE LIQUIDATING TRUSTEE FOR ENTRY OF AN ORDER EXTENDING THE TIME TO OBJECT TO CLAIMS, 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 *Third Motion of the Liquidating Trustee for Entry of an Order Extending the Time to Object to Claims* and related papers (the "Motion") with the Court seeking entry of an order to extend the deadline for the Liquidating Trustee to file objections to claims through and including March 10, 2027. 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 ***twenty-one (21) 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 Motion has been scheduled for November 4, 2026. The Court will hold a hearing on the **Motion** at **10:15 a.m. ET** on **November 4, 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.

[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, 600 Peachtree Street NE, Suite 5200, Atlanta, Georgia 30308, Attn: Todd C. Meyers, Email: toddmeyers@eversheds-sutherland.com, and Nathaniel T. DeLoatch, Email: natedeloatch@eversheds-sutherland.com.

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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 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: October 6, 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
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THIRD MOTION OF THE LIQUIDATING TRUSTEE FOR ENTRY OF AN ORDER EXTENDING THE TIME TO OBJECT TO CLAIMS

META Advisors LLC, solely in its capacity as the liquidating trustee (the "Liquidating Trustee") of the OTB Holding Liquidating Trust (the "Liquidating Trust"), established through those certain *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"), confirming the *Debtors' Amended and Joint Chapter 11 Plan as of July 21, 2025* [Docket No. 522] (as amended, supplemented, or modified, the "Plan"),[2] by and through undersigned counsel, files this motion (this "Motion") for entry of an order substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), seeking to extend the deadline for the Liquidating Trustee to object to Proofs of Claim that have been Filed against the Debtors by one hundred and twenty (120) days, through and including March 10, 2027, pursuant to sections 105(a) and 502 of 11

[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, 600 Peachtree Street NE, Suite 5200, Atlanta, Georgia 30308, Attn: Todd C. Meyers, Email: toddmeyers@eversheds-sutherland.com, and Nathaniel T. DeLoatch, Email: natedeloatch@eversheds-sutherland.com.

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

U.S.C. §§ 101-1532 (the "Bankruptcy Code"), Rules 3007 and 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 9006-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the "Local Rules"), without prejudice to the Liquidating Trustee's right to seek additional extensions. In support of this Motion, the Liquidating Trustee respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Further, the Court has jurisdiction over this matter pursuant to section 11 of the Plan.

2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief requested herein are sections 105(a) and 502 of the Bankruptcy Code, Bankruptcy Rules 3007 and 9006, and Rule 9006-1 of the Local Rules.

PERTINENT BACKGROUND

4. 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").

5. The factual background relating to the Chapter 11 Cases is set forth in the *Declaration of Jonathan M. Tibus in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 18] filed on or about the Petition Date and is incorporated herein by reference.

6. On July 21, 2025, the Debtors filed the Plan. On September 8, 2025, the Court entered the Confirmation Order confirming the Plan, and, on September 16, 2025, the Plan became effective according to its terms (the "Effective Date") [*see* Docket No. 620].

7. The Plan and Confirmation Order provide for, among other things, the creation of the Liquidating Trust and the appointment of the Liquidating Trustee to oversee the Liquidating Trust and administer the Liquidating Trust Assets. *See* Plan § 7.04. On the Effective Date, pursuant

to sections 1123(a)(5), 1123(b)(3) and 1141(b) of the Bankruptcy Code, all Liquidating Trust Assets automatically vested in the Liquidating Trust, free and clear of all claims, liens, contractual restrictions, charges, encumbrances, and Interests of creditors and equity security holders. *See id*. Consequently, the Liquidating Trustee is not only the Debtors' representative but is also responsible for administering the Liquidating Trust Assets, including making distributions required under the Plan and objecting to claims. *See id.* §§ 7.05, 8.05.

8. The Plan and Confirmation Order provide that the "Claims Objection Deadline" means the later of: (i) one hundred and twenty (120) days after the Effective Date; and (ii) such other date as may be fixed by the Bankruptcy Court. *See* Plan § 1.01. Consequently, the original Claims Objection Deadline was January 14, 2026.

9. On December 22, 2025, the Liquidating Trustee filed the *Motion of the Liquidating Trustee for Entry of an Order Extending the Time to Object to Claims* [Docket No. 689] (the "First Motion to Extend"). On January 15, 2026, the Court entered an order [Docket No. 700] granting the First Motion to Extend, thereby extending the original Claims Objection Deadline to July 13, 2026 (the "Extended Claims Objection Deadline").

10. On January 23, 2026, the Liquidating Trustee filed the *Motion of the Liquidating Trustee for Entry of an Order Closing Certain Chapter 11 Cases, Transferring Claims Asserted Therein to the Main Case, and Modifying the Caption of the Main Case* [Docket No. 702] (the "Motion to Close") which requested, among other things, (a) closure of certain of the Debtors' Chapter 11 cases and (b) transfer of all claims asserted in the Subsidiary Cases to the Main Case (as defined in the Motion to Close).

11. On February 18, 2026, the Court entered an order [Docket No. 725] granting the Motion to Close. Consequently, as of February 18, 2026, only the case of OTB Holding LLC remains open.

12. On June 5, 2026, the Liquidating Trustee filed the *Second Motion of the Liquidating Trustee for Entry of an Order Extending the Time to Object to Claims* [Docket No. 773] (the "Second Motion to Extend"). On June 29, 2026, the Court entered an order [Docket No. 788] granting the Second Motion to Extend, thereby further extending the Extended Claims Objection Deadline to November 10, 2026 (the "Second Extended Claims Objection Deadline" and, together with the Extended Claims Objection Deadline, collectively, the "Extended Claims Objection Deadlines").

13. Regarding omnibus objections to Claims, on February 24, 2026, the Liquidating Trustee filed its first, second, and third omnibus Claim objections [Docket Nos. 728, 729, and 730]; on May 5, 2026, the Liquidating Trustee filed its fourth, fifth, and sixth omnibus Claim objections [Docket Nos. 761, 762, and 763]; on May 8, 2026, the Liquidating Trustee filed its seventh omnibus Claim objection [Docket No. 764]; and, on May 12, 2026, the Liquidating Trustee filed its eighth omnibus Claim objection [Docket No. 766], each seeking the reduction, reclassification, modification, or disallowance and expungement of certain Claims as set forth therein. The Court granted these claim objections on April 6, 2026 [Docket Nos. 743, 744, and 745], June 10, 2026 [Docket Nos. 777, 778, 779, and 780], and July 2, 2026 [Docket No. 789].

14. Finally, on September 2, 2026, the Liquidating Trustee filed its ninth omnibus Claim objection [Docket No. 796], requesting reclassification, reduction, and/or disallowance and expungement of certain amended and superseded, satisfied, non-liability, reclassified, late-filed,

and insufficient documentation Claims. The first through the ninth omnibus Claim objections are hereafter known, collectively, as the "Omnibus Claim Objections."

15. As set forth herein, the Liquidating Trustee submits that adequate cause exists to warrant an extension of the Second Extended Claims Objection Deadline through and including March 10, 2027.

REQUESTED RELIEF AND BASIS THEREFOR

16. Pursuant to the Plan and Confirmation Order, the Court may extend the Second Extended Claims Objection Deadline by entry of an order upon request of the Liquidating Trustee. Plan §§ 1.01, 8.05. The Court is also authorized to extend the Second Extended Claims Objection Deadline under Bankruptcy Rule 9006, which provides that the Court may extend a time period provided under the Bankruptcy Rules or order of the Court for cause shown, with certain exceptions not applicable here. Fed. R. Bankr. P. 9006(b). Although the Bankruptcy Code does not define "cause," it has been noted that "courts should be liberal in granting extensions of time sought before the period to act has elapsed, so long as the moving party has not been guilty of negligence or bad faith and the privilege of extension has not been abused." COLLIER ON BANKRUPTCY ¶ 9006.06[2] (Alan N. Resnick & Henry J. Sommer eds., 16th ed. rev. 2016).

17. Moreover, section 105(a) of the Bankruptcy Code provides that "[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). It is generally recognized that "[s]ection 105(a) authorizes the bankruptcy court, or the district court sitting in bankruptcy, to fashion such orders as are required to further the substantive provisions of the Bankruptcy Code." COLLIER ON BANKRUPTCY ¶ 105.04 at 105-15, n.5 (15th ed. rev. 1989).

18. Courts in this district have regularly granted the relief requested herein. *See, e.g.*, *In re Fulcrum Loan Holdings, LLC*, Case No. 24-56114 (Bankr. N.D. Ga. Nov. 4, 2025) [Docket

No. 333] (extending claim objection deadline by 60 days); *In re Envistacom, LLC*, Case No. 23-52696 (Bankr. N.D. Ga. Nov. 1, 2024) [Docket No. 273] (extending claim objection deadline by 120 days in addition to a previously granted 120-day extension); *In re Clayton General Group, Inc*., Case No. 15-64266 (Bankr. N.D. Ga. Apr. 23, 2019) [Docket No. 1289] (extending claim objection deadline by 60 days in addition to a previously granted 90-day extension).

19. Here, the Liquidating Trustee submits that cause exists to extend the Second Extended Claims Objection Deadline because the proposed extension is necessary for the proper administration of the Liquidating Trust and is in the best interests of the Estates, creditors, and other parties in interest.

20. Since the Effective Date and imposition of the Extended Claims Objection Deadlines, the Liquidating Trustee and its professionals have been, among other tasks, effecting the winddown of the Debtors' Estates and maximizing the value of and administering the Liquidating Trust Assets. Indeed, the Liquidating Trustee and its professionals have, among other things: (i) closed all cases except that of OTB Holding LLC; (ii) resolved multiple insurance-related issues [*see*, *e.g.*, Docket Nos. 627, 628]; (iii) addressed both requests for relief from the automatic stay and violations of the automatic stay and the Plan's injunction provisions through, among other things, the initiation or continuation of non-bankruptcy litigation; (iv) coordinated with the Wind-Down Officer regarding the sale of multiple liquor licenses; and (v) reviewed and reconciled a substantial portion of the Claims Filed against the Debtors, as evidenced by the Omnibus Claim Objections.

21. Moreover, and in addition to the foregoing, the Liquidating Trustee and its professionals are: (i) facilitating the sale of a class action litigation claim held by the Liquidating Trust; (ii) reconciling multiple tax and employee-related Claims, among others; (iii) investigating

potential causes of action held by the Liquidating Trust; and (iv) overseeing the winddown of the Debtors' 401(k) plan.

22. These tasks have required a significant amount of time and attention. Although the claims reconciliation process is near completion, it remains ongoing, and the Liquidating Trustee and its professionals are still addressing a limited number of Claims, including certain tax and employment-related Claims (as noted above) that require additional diligence to fully reconcile.[3] As such, the Liquidating Trustee and its professionals reasonably require additional time to ensure that all Claims are appropriately reviewed and reconciled, which will benefit the Debtors' Estates and all creditors holding valid Claims. By contrast, if the Second Extended Claims Objection Deadline is not further extended as requested herein, invalid, unsupported, duplicate, amended and superseded, or otherwise satisfied Claims may be allowed, which would be prejudicial to holders of valid and supported Claims.

23. Therefore, the Liquidating Trustee submits that the extension of the Second Extended Claims Objection Deadline requested herein is: (i) reasonable and necessary under the circumstances; (ii) well within the range of extensions granted in comparable chapter 11 cases; and (iii) inures to the benefit of creditors and parties in interest. As such, the Liquidating Trustee respectfully requests that the Court grant the proposed extension of the Second Extended Claims Objection Deadline, without prejudice to its rights to seek a further extension of such deadline.

NO PRIOR REQUEST

24. Other than the First Motion to Extend and the Second Motion to Extend, no prior request for the relief requested herein has been made by the Liquidating Trustee to this or any other court.

[3] After discussions with the Wind-Down Officer and its professionals, the Liquidating Trust must review certain claims that it did not initially anticipate having to address.

NOTICE

25. Notice of this Motion will be provided to (i) the United States Trustee for the Northern District of Georgia; and (ii) the Limited Service List set forth by Kurtzman Carson Consultants, LLC d/b/a Verita Global, the Debtors' claims and noticing agent ("Verita"). The Liquidating Trustee submits that no other or further notice is required.

CONCLUSION

WHEREFORE, the Liquidating Trustee respectfully requests that the Court enter the Proposed Order extending the Second Extended Claims Objection Deadline through and including March 10, 2027, without prejudice to the Liquidating Trustee's right to seek further extensions thereof and granting such other and further relief as the Court deems just and proper.

Dated: October 6, 2026

EVERSHEDS SUTHERLAND (US) LLP

/s/ Nathaniel T. DeLoatch

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Counsel to the Liquidating Trustee of the OTB Holding Liquidating Trust

EXHIBIT A

(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 GRANTING THE THIRD MOTION OF THE LIQUIDATING TRUSTEE FOR ENTRY OF AN ORDER EXTENDING THE TIME TO OBJECT TO CLAIMS

Upon consideration of the relief requested in the *Third Motion of the Liquidating Trustee for Entry of an Order Extending the Time to Object to Claims* (the "Motion"),[2] pursuant to, among others, sections 105(a) and 502 of the Bankruptcy Code, and Rules 3007 and 9006 of the Federal Rules of Bankruptcy Procedure, and the authority granted to the Liquidating Trustee pursuant to the Plan and Confirmation Order; and it appearing that the Court has jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and section 11 of the Plan; and it appearing that venue of this case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that the notice of the Motion as set forth therein is sufficient, and that no other or further notice need be provided; and this Court having found that the relief requested in the Motion is in the best interests of the Liquidating Trust, its beneficiaries, 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, 600 Peachtree Street NE, Suite 5200, Atlanta, Georgia 30308, Attn: Todd C. Meyers, Email: toddmeyers@eversheds-sutherland.com, and Nathaniel T. DeLoatch, Email: natedeloatch@eversheds-sutherland.com.

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

Debtors, the Estates, and all other parties-in-interest; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The Second Extended Claims Objection Deadline is hereby extended through and including March 10, 2027, without prejudice to the right of the Liquidating Trustee to seek further extensions of such deadline.

3. This Order is without prejudice to the rights of the Liquidating Trustee with respect to any and all adversary proceedings and contested matters (or any other actions or proceedings whether ongoing or not yet commenced) regarding claims or causes of action retained by the Liquidating Trust.

4. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules are hereby satisfied by such notice.

5. Notwithstanding any Bankruptcy Rule or Local Rule that might otherwise delay the effectiveness of this Order, the terms and conditions of this Order shall be immediately enforceable upon its entry.

6. The Court shall retain jurisdiction over any and all matters arising from the interpretation, implementation, or enforcement of this Order.

7. 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 Motion, 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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