IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Pacifica of the Valley Corp.,[1]	Case No. 26-11060 (TMH)
Debtor.	**Re: Docket Nos. 13, 57 & 89**

RESERVATION OF RIGHTS OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS IN CONNECTION WITH THE AMENDED BUDGET AND EXTENSION OF INTERIM ORDER (I) AUTHORIZING THE DEBTOR TO (A) USE CASH COLLATERAL AND (B) GRANT LIENS AND SUPERPRIORITY ADMINISTRATIVE EXPENSE CLAIMS; (II) GRANTING ADEQUATE PROTECTION TO PREPETITION SECURED PARTIES (III) SCHEDULING A FINAL HEARING; AND (IV) GRANTING RELATED RELIEF

The Official Committee of Unsecured Creditors (the "Committee") of the above-captioned debtor (the "Debtor") files this reservation of rights in connection with the *Notice Regarding Amended Budget and Extension of Interim Order (I) Authorizing the Debtor to (A) Use Cash Collateral and (B) Grant Liens and Superpriority Administrative Expense Claims; (II) Granting Adequate Protection to Prepetition Secured Parties (III) Scheduling a Final Hearing; and (IV) Granting Related Relief* (the "Notice") [Docket No. 89], and respectfully states as follows:

1. The Committee was appointed on July 20, 2026 and has just recently retained the undersigned counsel to represent it (subject to approval of this Court) and is in the process of retaining a financial advisor.

2. On July 7, 2026, the Debtor filed the *Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Use Cash Collateral and (B) Grant Liens and Superpriority Administrative Claims; (II) Granting Adequate Protection to Prepetition Secured*

[1] The last four digits of the Debtor's federal tax identification number, is 7312. The Debtor's mailing address is 9449 San Fernando Road, Sun Valley, CA 91352.

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Parties; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief (the "Motion") [Docket No. 13].[2]

3. On July 9, 2026, the Court entered the *Interim Order (I) Authorizing the Debtor to (A) Use Cash Collateral and (B) Grant Liens and Superpriority Administrative Expense Claims; (II) Granting Adequate Protection to Prepetition Secured Parties (III) Scheduling a Final Hearing; and (IV) Granting Related Relief* (the "Interim Cash Collateral Order") [Docket No. 57].

4. Pursuant to the Notice, the Debtor provided notice that the Prepetition Secured Parties each consented to extend the Debtor's use of Cash Collateral through and including August 8, 2026, in accordance with an amended budget (the "Budget") attached to the Notice as **Exhibit A**.

5. The Committee is still in the process of reviewing the Motion, the terms of the Interim Cash Collateral Order and the Budget.

6. The Budget includes a line item for rent to be paid to Reliq Pacifica LLC, Beverly Gemini Investments, LLC, Taking the 5th, LLC, and Fifth/Arizona Investors, LLC (collectively, the "Landlord Entities") in the amount of $630,478 (the "Rent Payment) during the week ending Augst 1, 2026.

7. The Committee has yet to have a reasonable opportunity to review and analyze the various line items in the Budget and reserves all rights to challenge the Rent Payment, any past or future payments to the Landlord Entities, any payment of any other budget item(s), or otherwise object to any terms or conditions of the proposed further interim or final cash collateral orders on any basis.

2 All Capitalized terms not otherwise defined herein are ascribed the meaning give in the Motion, the Interim Cash Collateral Order or the Notice, as applicable.

Dated: July 27, 2026
Wilmington, Delaware

Respectfully submitted,

/s/ Andrew C. Ehrmann

Christopher M. Samis (No. 4909)
Aaron H. Stulman (No. 5807)
Andrew C. Ehrmann (No. 7395)
ICE MILLER LLP
500 Delaware Avenue, Suite 220
Wilmington, Delaware 19801
Telephone: (302) 313-0600
Email: christopher.samis@icemiller.com
aaron.stulman@icemiller.com
andrew.ehrmann@icemiller.com

-and-

Andrew H. Sherman (admitted *pro hac vice*)
Boris I. Mankovetskiy (admitted *pro hac vice*)
SILLS CUMMIS & GROSS P.C.
The Legal Center
One Riverfront Plaza
Newark, New Jersey 07102
Telephone: (973) 643-7000
Facsimile: (973) 643-6500
Email: asherman@sillscummis.com
bmankovetskiy@sillscummis.com

Proposed Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I, Andrew C. Ehrmann, do hereby certify that on July 27, 2026, a copy of the foregoing **Reservation of Rights of the Official Committee of Unsecured Creditors in Connection with the Amended Budget and Extension of Interim Order (I) Authorizing the Debtors to (A) Use Cash Collateral and (B) Grant Liens and Superpriority Administrative Expense Claims; (II) Granting Adequate Protection to Prepetition Secured Parties (III) Scheduling a Final Hearing, and (IV) Granting Related Relief** was served on the parties listed on the attached service list in the manners indicated.

/s/ Andrew C. Ehrmann
Andrew C. Ehrmann (No. 7395)

SERVICE LIST

Proposed Counsel to the Debtor Tania M. Moyron, Esq. Samuel R. Maizel, Esq. DENTONS US LLP 601 S. Figueroa Street, #2500 Los Angeles, CA 90017 Email: tania.moyron@dentons.com; samuel.maizel@dentons.com **Via Email**	**Proposed Counsel to the Debtor** John D. Beck, Esq. Geoffrey Miller, Esq. DENTONS US LLP 1221 Avenue of the Americas New York, NY 10020 Email: john.beck@dentons.com; geoffrey.miller@dentons.com **Via Email**	**Proposed Counsel to the Debtor** Laura Davis Jones, Esq. Timothy Cairns, Esq. PACHULSKI STANG ZIEHL & JONES LLP Email: ljones@pszjlaw.com; tcairns@pszjlaw.com **Via Email**
Local Initiative Health Authority for Los Angeles County Martha Santana-Chin, CEO Augustavia J. Haydel, General Counsel 1200 West 7th Street Los Angele, CA 90017 Email: MSantana-Chin@lacare.org; AHaydel@lacare.org **Via Email**	**Counsel to Axios Capital Solutions, LLC** Thomas J. Francella, Esq. Mark W. Eckard, Esq. RAINES FELDMAN LITTRELL LLP 824 N. Market Street, Suite 805 Wilmington, DE 19801 Email: tfrancella@raineslaw.com; meckard@raineslaw.com **Via Email**	**Counsel to Axios Capital Solutions, LLC** Hamid R. Rafatjoo, Esq. RAINES FELDMAN LITTRELL LLP 4675 MacArthur Ct., Suite 1550 Newport Beach, CA 92660 Email: HRafatjoo@RainesLaw.com **Via Email**
Counsel to Axios Capital Solutions, LLC Carollyn H.G. Callari, Esq. RAINES FELDMAN LITTRELL LLP 1350 Avenue of the Americas, 22nd Floor New York, NY 10019 Email: ccallari@raineslaw.com **Via Email**	**Counsel to Reliq Pacifica LLC and Beverly Gemini Investments, LLC** Matthew R. Pierce, Esq. George A. Williams, III, Esq. LANDIS RATH & COBB LLP 919 N. Market Street, Suite 1800 Wilmington, DE 19801 Email: pierce@lrclaw.com; williams@lrclaw.com **Via Email**	**Counsel to Reliq Pacifica LLC and Beverly Gemini Investments, LLC** Mary H. Rose, Esq. BUCHALTER LLP 1000 Wilshire Boulevard, Suite 1500 Los Angeles, CA 90017 Email: mrose@buchalter.com **Via Email**
Fifth/Arizona Investors, LLC Logan Beitler 825 S. Barrington Avenue Los Angeles, CA 90049 **Via First-Class Mail**	**Taking the 5th, LLC** 1489 W. Palmetto Park Road, Suite 340 Boca Raton, FL 33486 **Via First-Class Mail**	**Taking the 5th, LLC** Joshua Gerstin, Esq. GERSTIN & ASSOCIATES 40 SE 5th Street, Suite 610 Boca Raton, FL 33432 **Via First-Class Mail**
Office of the United States Trustee Hannah J. McCollum, Esq. 844 King Street, Suite 2207 Lockbox 35 Wilmington, DE 19801 Email: hannah.mccollum@usdoj.gov **Via Email**		