Docket #0766 Date Filed: 04/30/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
SEQUENTIAL BRANDS GROUP, INC.,[1]	)	Case No. 21-11194 (MFW)
Debtor.	)	(Jointly Administered)

Hearing Date: To Be Scheduled If Necessary
Objection Deadline: May 14, 2026 at 4:00 p.m. (ET)

MOTION FOR FURTHER EXTENSION OF DEADLINE TO OBJECT TO CLAIMS

Drivetrain LLC, in its capacity as trustee of the liquidating trust (the "Liquidating Trustee") for the above-captioned debtors and debtors in possession (collectively, the "Debtors"), hereby moves (this "Motion") for the entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), further extending the time period to file and serve objections to claims (the "Claims Objection Deadline") through and including **August 31, 2026**, without prejudice to the rights of the Liquidating Trustee to seek additional extensions. The current deadline to object to claims is April 30, 2026. In support of the Motion, the Liquidating Trustee respectfully represents as follows:

Jurisdiction and Venue

1. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Sequential Brands Group, Inc. (2789), SQBG, Inc. (9546), Sequential Licensing, Inc. (7108), William Rast Licensing, LLC (4304), Heeling Sports Limited (0479), Brand Matter, LLC (1258), SBG FM, LLC (8013), Galaxy Brands LLC (9583), The Basketball Marketing Company, Inc. (7003), American Sporting Goods Corporation (1696), LNT Brands LLC (3923), Joe's Holdings LLC (3085), Gaiam Brand Holdco, LLC (1581), Gaiam Americas, Inc. (8894), SBG-Gaiam Holdings, LLC (8923), SBG Universe Brands, LLC (4322), and GBT Promotions LLC (7003). The mailing address for each Debtor is 105 E. 34th Street, #249, New York, NY 10016. On September 26, 2022, the Court entered an order [Docket No. 646] closing the chapter 11 cases of the Debtors other than Case No. 21-11194 (MFW), *Sequential Brands Group, Inc.*

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Court for the District of Delaware (the "Court") under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012, and Article XI of the *First Amended Joint Plan of Liquidation of Sequential Brands Group, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (together with all exhibits thereto, and as may be amended, modified, or supplemented, the "Plan"). This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Liquidating Trustee consents, pursuant to Rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are section 105 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 9006–2.

Background

4. On August 31, 2021 (the "Petition Date"), the Debtors commenced these cases by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors have continued in the possession of their property and have continued to operate and manage their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or committee has been appointed in the Debtors' chapter 11 cases.

5. The factual background regarding the Debtors, including their historical business operations and the events precipitating their chapter 11 filings, is set forth in detail in the

Declaration of Lorraine DiSanto in Support of the Debtors' Chapter 11 Petitions and Requests for First Day Relief [Docket No. 3] (the "First Day Declaration"), which is fully incorporated herein by reference.[2]

6. On October 4, 2021, the Court entered an order [Docket No. 162] (the "Bar Date Order") establishing certain dates by which parties holding prepetition claims against the Debtors must file proofs of claim ("Proofs of Claim"), including claims by governmental units, claims arising under section 503(b)(9) of the Bankruptcy Code, Rejection Damages Claims, and requests for payment of certain Administrative Claims.

7. On November 3, 2021, the Court entered four orders approving the sale of substantially all of the Debtors' assets (the "Sale Transactions") to Gainline Galaxy Holdings LLC, Centric Brands, LLC, With You Inc., and JJWHP, LLC ("collectively, the "Buyers"). The Sale Transactions with the Buyers were consummated on November 9, 2021 and November 12, 2021.

8. On February 22, 2022, the Court entered an order [Docket No. 486] (the "Confirmation Order") confirming the Plan [Docket No. 380], which is attached as Exhibit A to the Confirmation Order.

9. The Confirmation Order appointed Drivetrain LLC as the Liquidating Trustee of the SBGI Liquidating Trust as of the Effective Date, which occurred on March 3, 2022.

10. Pursuant to the Plan, the Claims Objection Deadline was initially "180 days after the Effective Date, subject to extension as set forth in Section V.L. of the Plan." (Plan at Art. I.A.24.) Accordingly, the Claims Objection Deadline was initially August 30, 2022.

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the First Day Declaration.

11. The Liquidating Trustee has previously obtained orders to extend the Claims Objection Deadline. Most recently, on December 22, 2025, the Liquidating Trustee filed the *Motion for Further Extension of Deadline to Object to Claims* [Docket No. 753]. On January 7, 2026, the Court entered an Order [Docket No. 759] granting the motion and extending the Claims Objection Deadline to April 30, 2026, without prejudice to the rights of the Liquidating Trustee to request further extensions of the Claims Objection Deadline.

12. As of the date hereof, the Liquidating Trustee is conducting a claims reconciliation process that includes identifying particular categories of claims that may be targeted for disallowance and expungement, reduction and allowance, or reclassification and allowance. In connection therewith, the Liquidating Trustee may file omnibus objections to administrative and priority claims.

13. The Liquidating Trustee has continued to engage in the claims reconciliation process in the time since the previous extension of the Claims Objection Deadline. The Liquidating Trustee seeks more time to complete its final review of the claims, complete and document any resolution, wind down the claims reconciliation process, and, if necessary, oppose formally any claims not otherwise consensually resolved.

Relief Requested

14. By this Motion, the Liquidating Trustee respectfully requests entry of the Proposed Order: (a) extending the Claims Objection Deadline by approximately 120 days, through and including **August 31, 2026**, without prejudice to the rights of the Liquidating Trustee to request further extensions of the Claims Objection Deadline; and (b) granting related relief.[3]

[3] Pursuant to Local Rule 9006–2, since this Motion was filed before the expiration of the Claims Objection Deadline, the time is automatically extended until the Court rules on the Motion.

Basis for Relief

15. Section 105(a) of the Bankruptcy Code provides that the Court may "issue any order . . . necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). Moreover, Bankruptcy Rule 9006(b) provides that, "when these rules, a notice given under these rules, or a court order requires or allows an act to be performed at or within a specified period . . . , the court may-at any time and for cause-extend the time to act if: . . . with or without a motion or notice, a request to extend is made before the period (or a previously extended period) expires." Fed. R. Bankr. P. 9006(b)(1).

16. Cause exists to extend the Claims Objection Deadline as requested herein because claims are still under review by the Liquidating Trustee.

17. The Liquidating Trustee has analyzed and, in many cases, resolved or deemed satisfied the proofs of claim filed against the Debtors in these cases. The Liquidating Trustee's review and reconciliation process is still ongoing, and the Liquidating Trustee wishes to pursue claim objections in a cost-efficient manner. This requires further efforts at informal resolution to minimize the administrative expenses associated with pursuing formal objections to claims. Consequently, the Liquidating Trustee requests additional time to engage in a process of further review, reconciliation, and settlement discussions to minimize the number of claims that will be the subject of any formal objections.

18. Accordingly, the Liquidating Trustee requests an extension of the Claims Objection Deadline through and including **August 31, 2026**.

Notice

19. The Liquidating Trustee will serve copies of this Motion on: (a) the Office of the United States Trustee for the District of Delaware; (b) counsel to Bank of America N.A., as

administrative and collateral agent under the BoA Credit Agreement; (c) counsel to Wilmington Trust, N.A.; and (d) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Liquidating Trustee submits that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE, the Liquidating Trustee respectfully requests that the Court enter the Proposed Order, granting the relief requested herein and granting such other and further relief as the Court deems just and proper.

Dated: April 30, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones
Laura Davis Jones (DE Bar No. 2436)
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Counsel to the Liquidating Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
SEQUENTIAL BRANDS GROUP, INC.,[1]	)	Case No. 21-11194 (MFW)
Debtor.	)	(Jointly Administered)

Hearing Date: To Be Scheduled If Necessary
Objection Deadline: May 14, 2026 at 4:00 p.m. (ET)

NOTICE OF MOTION FOR FURTHER EXTENSION OF DEADLINE TO OBJECT TO CLAIMS

PLEASE TAKE NOTICE THAT on April 30, 2026, Drivetrain LLC, in its capacity as trustee of the liquidating trust (the "Liquidating Trustee") for the above-captioned debtors and debtors in possession (collectively, the "Debtors"), filed the *Motion for Further Extension of Deadline to Object to Claims* (the "Motion") with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court"). A copy of the Motion is attached hereto.

PLEASE TAKE FURTHER NOTICE that any response or objection to the entry of an order with respect to the relief requested in the Motion must be filed with the Bankruptcy Court on or before **May 14, 2026 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon: (a) the Office of the United States Trustee for the District of

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Sequential Brands Group, Inc. (2789), SQBG, Inc. (9546), Sequential Licensing, Inc. (7108), William Rast Licensing, LLC (4304), Heeling Sports Limited (0479), Brand Matter, LLC (1258), SBG FM, LLC (8013), Galaxy Brands LLC (9583), The Basketball Marketing Company, Inc. (7003), American Sporting Goods Corporation (1696), LNT Brands LLC (3923), Joe's Holdings LLC (3085), Gaiam Brand Holdco, LLC (1581), Gaiam Americas, Inc. (8894), SBG-Gaiam Holdings, LLC (8923), SBG Universe Brands, LLC (4322), and GBT Promotions LLC (7003). The mailing address for each Debtor is 105 E. 34th Street, #249, New York, NY 10016. On September 26, 2022, the Court entered an order [Docket No. 646] closing the chapter 11 cases of the Debtors other than Case No. 21-11194 (MFW), *Sequential Brands Group, Inc.*

Delaware (Attn: Timothy J. Fox (Timothy.Fox@usdoj.gov)); (b) counsel to the Liquidating Trustee, Pachulski Stang Ziehl & Jones LLP (Attn: Laura Davis Jones (ljones@pszjlaw.com) and Timothy P. Cairns (tcairns@pszjlaw.com)); (c) counsel to Bank of America N.A., as administrative and collateral agent under the BoA Credit Agreement, (i) Morgan, Lewis & Bockius LLP, One Federal Street, Boston, MA 02110-1726 (Attn: Julie Frost-Davies (julia.frost-davies@morganlewis.com) and Christopher L. Carter (christopher.carter@morganlewis.com)), and (ii) Robinson & Cole LLP, 1201 N. Market Street, Suite 1406, Wilmington, DE 19801 (Attn: Jamie L. Edmonson (jedmonson@rc.com) and James L. Lanthrop (jlathrop@rc.com)), and 1650 Market Street, Suite 3600, Philadelphia, PA 19103 (Attn: Rachel Jaffe Mauceri (rmauceri@rc.com)); (d) counsel to Wilmington Trust, N.A., (i) Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market Street, 16th Floor, Wilmington, DE 19801 (Attn: Derek C. Abbott (dabbott@morrisnichols.com), Curtis S. Miller (cmiller@morrisnichols.com), and Paige N. Topper (ptopper@morrisnichols.com)), and (ii) James-Bateman-Brannan-Groover LLP, Buckhead Tower at Lenox Square, 3399 Peachtree Road NE, Suite 1700, Atlanta, GA 30326 (Attn: Doroteya N. Wozniak (dwozniak@jamesbatesllp.com)); and (e) any party that has requested notice pursuant to Bankruptcy Rule 2002.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF REQUESTED IN THE MOTION WILL BE HELD, **IF NECESSARY, AT A DATE AND TIME TO BE DETERMINED** BEFORE THE HONORABLE MARY F. WALRATH, UNITED STATES BANKRUPTCY JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM NO. 4, WILMINGTON, DELAWARE 19801. YOU WILL RECEIVE FURTHER NOTICE IF A HEARING IS SCHEDULED.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 30, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
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Counsel to the Liquidating Trustee

Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
SEQUENTIAL BRANDS GROUP, INC.,[1]	)	Case No. 21-11194 (MFW)
Debtor.	)	(Jointly Administered)
	)	**Ref. Docket No. ____**

ORDER FURTHER EXTENDING DEADLINE TO OBJECT TO CLAIMS

Upon consideration of the *Motion for Further Extension of Deadline to Object to Claims* (the "Motion")[2] filed by Drivetrain LLC, in its capacity as trustee of the liquidating trust (the "Liquidating Trustee") for the above-captioned debtors and debtors in possession, and it appearing that good cause exists to grant the relief requested by the Motion;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The time period to file and serve objections to claims in these cases (the "Claims Objection Deadline") is extended through and including **August 31, 2026**, without prejudice to the rights of the Liquidating Trustee to request further extensions.

3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Sequential Brands Group, Inc. (2789), SQBG, Inc. (9546), Sequential Licensing, Inc. (7108), William Rast Licensing, LLC (4304), Heeling Sports Limited (0479), Brand Matter, LLC (1258), SBG FM, LLC (8013), Galaxy Brands LLC (9583), The Basketball Marketing Company, Inc. (7003), American Sporting Goods Corporation (1696), LNT Brands LLC (3923), Joe's Holdings LLC (3085), Gaiam Brand Holdco, LLC (1581), Gaiam Americas, Inc. (8894), SBG-Gaiam Holdings, LLC (8923), SBG Universe Brands, LLC (4322), and GBT Promotions LLC (7003). The mailing address for each Debtor is 105 E. 34th Street, #249, New York, NY 10016. On September 26, 2022, the Court entered an order [Docket No. 646] closing the chapter 11 cases of the Debtors other than Case No. 21-11194 (MFW), *Sequential Brands Group, Inc.*

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

4. The Liquidating Trustee is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.