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.	)	

Hearing Date: To Be Scheduled If Necessary
Objection Deadline: September 11, 2026 at 4:00 p.m. (ET)

LIQUIDATING TRUSTEE'S MOTION FOR FURTHER ENLARGEMENT OF THE PERIOD TO REMOVE ACTIONS

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 entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), further enlarging the period (the "Removal Period") within which the Liquidating Trustee may remove claims or causes of action (collectively, the "Actions") pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") through and including **December 29, 2026**, without prejudice to the rights of the Liquidating Trustee to request additional extensions. The last day of the Removal Period is currently August 31, 2026. In support of this Motion, the Liquidating Trustee respectfully states as follows:

[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, 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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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 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 1452 of title 28 of the United States Code, Bankruptcy Rules 9006 and 9027, 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 title 11 of the United States Code (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.

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

10. Pursuant to Bankruptcy Rule 9027(a)(2), the last day of the Removal Period was initially 90 days after the Petition Date, or November 29, 2021.

11. The Liquidating Trustee has previously obtained orders to enlarge the Removal Period. Most recently, on April 30, 2026, the Liquidating Trustee filed the *Liquidating Trustee's Motion for Further Enlargement of the Period to Remove Actions* [Docket No. 767]. On May 19, 2026, the Court entered an Order [Docket No. 772] granting the motion and enlarging the Removal Period through and including August 31, 2026, without prejudice to the rights of the Liquidating Trustee to request further extensions.

The Actions

12. The Debtors are involved in Actions in a number of jurisdictions, and the Actions involve a variety of types of cases. The Liquidating Trustee continues to evaluate whether to remove any of these Actions pursuant to its duty to wind down the Debtors' estates.

13. On October 19, 2021, each of the Debtors filed their Schedules of Assets and Liabilities and Statements of Financial Affairs (collectively, the "Schedules and Statements"). As part of the Schedules and Statements, the Debtors identified the Actions of which the Debtors are currently aware.

14. The Liquidating Trustee may become aware of Actions in connection with Proofs of Claim that are filed in these chapter 11 cases, and the Liquidating Trustee has not yet made a final determination as to liquidation or objection for all filed Proofs of Claim. Prior to the filing of this Motion, the Liquidating Trustee has filed two omnibus objections to Proofs of Claim. While the Liquidating Trustee believes these objections will resolve all matters in these cases with respect to filed Proofs of Claim, informal analysis of Proofs of Claim and related Actions continues.

15. The Liquidating Trustee is analyzing the Actions, as well as any filed Proofs of Claim, to determine whether the Liquidating Trustee will seek to remove any Actions. The Liquidating Trustee is not yet prepared to make a final determination as to which Actions, if any, it will seek to remove.

Relief Requested

16. By this Motion, the Liquidating Trustee respectfully requests entry of the Proposed Order: (a) enlarging the Removal Period through and including **December 29, 2026**, without prejudice to the rights of the Liquidating Trustee to request further extensions of the Removal Period; and (b) granting related relief.[3]

Basis for Relief

17. Section 1452 of title 28 of the United States Code and Bankruptcy Rule 9027 govern the removal of pending civil actions related to chapter 11 cases. Specifically, section 1452(a) provides:

> A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.

28 U.S.C. § 1452(a).

18. Bankruptcy Rule 9027 sets forth the time periods for filing notices to remove claims or causes of action. Specifically, Bankruptcy Rule 9027(a)(2) provides, in pertinent part:

> If the claim or cause of action in a civil action is pending when a bankruptcy case is commenced, the notice of removal must be filed within the longest of these periods:

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

> (A) 90 days after the order for relief in the bankruptcy case;
>
> (B) if the claim or cause of action has been stated under § 362, 30 days after an order terminating the stay is entered; or
>
> (C) in a Chapter 11 case, 30 days after a trustee qualifies-but no later than 180 days after the order for relief.

Fed. R. Bankr. P. 9027(a)(2).

19. Bankruptcy Rule 9027(a)(3) also provides as follows:

> If a claim or cause of action is asserted in another court after the bankruptcy case was commended, a party filing a notice of removal must do so with the shorter of these periods:
>
> (A) 30 days after receiving (by service or otherwise) the initial pleading setting forth the claim or cause of action sought to be removed; or
>
> (B) 30 days after receiving the summons if the initial pleading has been filed but not served with the summons.

Fed. R. Bankr. P. 9027(a)(3).

20. Bankruptcy Rule 9006 permits the Court to extend the period to remove actions provided by Bankruptcy Rule 9027. 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).

21. It is well-settled that the Court is authorized to enlarge the Removal Period. *See Pacor, Inc. v. Higgins*, 743 F.2d 984, 996 n.17 (3d Cir. 1984) (holding that the bankruptcy court's power to grant an extension of the removal period pursuant to Bankruptcy Rule 9006(b) is "clear"), *overruled on other grounds by Things Remembered, Inc. v. Petrarca*, 516 U.S. 124, 134–35 (1995); *Caperton v. A.T. Massey Coal Co.*, 251 B.R. 322, 325 (S.D. W. Va. 2000) (stating that

Bankruptcy Rule 9006 provides authority to enlarge time periods for removing actions under Bankruptcy Rule 9027); *In re Jandous Elec. Constr. Corp.*, 106 B.R. 48, 50 (Bankr. S.D.N.Y. 1989) (finding that the period in which to file a motion to remove may be expanded pursuant to Bankruptcy Rule 9006); *In re World Fin. Servs. Ctr., Inc.*, 81 B.R. 33, 39 (Bankr. S.D. Cal. 1987) (finding that the Supreme Court intended to give bankruptcy judges the power to enlarge the filing periods under Bankruptcy Rule 9027(a) pursuant to Bankruptcy Rule 9006(b)); *Raff v. Gordon*, 58 B.R. 988, 990 (E.D. Pa. 1986) (finding that an expansion of time to file notices of removal is authorized under the Bankruptcy Rules).

22. The Liquidating Trustee's decision regarding whether to seek removal of any particular Action depends on a number of factors, including: (a) the importance of the Action to the expeditious resolution of these cases; (b) the time required to complete the Action in its current venue; (c) the presence of federal subject matter jurisdiction in the proceeding that may allow for one or more aspects thereof to be heard by a federal court; (d) the relationship between the Action and matters to be addressed in connection with the Plan and the wind-down process; and (e) the progress made to date in the Action. To make the appropriate determination, the Liquidating Trustee must analyze each Action in light of such factors.

23. To date, the Liquidating Trustee has not yet determined conclusively whether any Actions require removal. The Liquidating Trustee continues to evaluate each of the Actions and expects to make the appropriate determinations concerning their removal. In addition, the Liquidating Trustee continues to evaluate Proofs of Claim filed against the Debtors and has not yet made any final determination whether any of the Proof of Claim identify additional Actions that may need to be removed.

24. The Liquidating Trustee believes the extension requested herein will provide time to make well-informed decisions concerning the removal of any potential Actions and will ensure that the estates' rights provided by 28 U.S.C. § 1452 can be exercised in an appropriate manner. Alternately, if such an extension is not granted, the Liquidating Trustee believes it may not uncover and evaluate properly the removal of any potential Action for the benefit of the estates. The rights of parties to the potential Actions will not be unduly prejudiced by the Liquidating Trustee's requested extension of the Removal Period. If the Liquidating Trustee ultimately seeks to remove Actions pursuant to Bankruptcy Rule 9027, parties will retain their rights to have such Actions remanded pursuant to 28 U.S.C. § 1452(b). Accordingly, the Liquidating Trustee submits that cause exists for the relief requested herein.

Notice

25. 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: August 28, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

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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.	)	

Hearing Date: To Be Scheduled if Necessary
Objection Deadline: September 11, 2026 at 4:00 p.m. (ET)

NOTICE OF LIQUIDATING TRUSTEE'S MOTION FOR FURTHER ENLARGEMENT OF THE PERIOD TO REMOVE ACTIONS

PLEASE TAKE NOTICE that on August 28, 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 *Liquidating Trustee's Motion for Further Enlargement of the Period to Remove Actions* (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 **September 11, 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, 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: August 28, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

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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.	)	
	)	**Ref. Docket No. ____**

ORDER FURTHER ENLARGING THE PERIOD WITHIN WHICH THE LIQUIDATING TRUSTEE MAY REMOVE ACTIONS

Upon consideration of the *Liquidating Trustee's Motion for Further Enlargement of the Period to Remove Actions* (the "Motion")[2] of 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 period within which the Liquidating Trustee may seek removal of the Actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 is enlarged through and including **December 29, 2026**, without prejudice to the rights of the Liquidating Trustee to request further extensions.

[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, 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.

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

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.