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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

THRASIO HOLDINGS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11840 (CMG)

(Jointly Administered)

**APPLICATION FOR ORDER SHORTENING TIME FOR HEARING ON THE
MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS TO FILE UNDER SEAL ITS
SUPPLEMENTAL OBJECTION TO DEBTORS’ DISCLOSURE STATEMENT FOR
THE JOINT PLAN OF REORGANIZATION OF THRASIO HOLDINGS, INC. AND ITS
DEBTOR AFFILIATES PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE**

The Official Committee of Unsecured Creditors (the “Committee”) of Thrasio Holdings, Inc., *et al.* (collectively, the “Debtors”), by and through its undersigned counsel, respectfully requests through this application (the “Application”) that the time period for a hearing on the *Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal Its Supplemental Objection to Debtors’ Disclosure Statement for the Joint Plan of*

¹ The last four digits of Debtor Thrasio Holdings, Inc.’s tax identification number are 8327. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.kccllc.net/Thrasio>. The Debtors’ service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.



Reorganization of Thrasio Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (the “Seal Motion”), as required by Fed. R. Bankr. P. 2002, be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. The Committee requests a hearing on shortened time because, contemporaneously herewith, the Committee filed its supplemental objection (the “Supplemental Objection”) to the Debtors’ *Motion For Entry of an Order Approving (I) the Adequacy of the Disclosure Statement, (II) the Solicitation and Voting Procedures, (III) the Forms of Ballots and Notices in Connection Therewith, and (IV) Certain Dates with Respect Thereto* (the “Motion”),² which is currently scheduled to be heard by the Court on April 18, 2024 (the “Disclosure Statement Hearing”). The Seal Motion seeks to seal the exhibits to the Supplemental Objection, which are confidential pursuant to the confidentiality agreement entered into between the Committee and Debtors. If this Application is not granted, parties would have twenty-one (21) days to object to the Seal Motion, which would permit parties to file objections after the Disclosure Statement Hearing. The Committee therefore respectfully requests that the Court enter an order shortening time to consider the Seal Motion such that the Seal Motion will be heard at the Disclosure Statement Hearing.

2. By this Application, the Committee respectfully requests that the hearing on the Seal Motion be scheduled at the Disclosure Statement Hearing set for April 18, 2024.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P. 9006(c)(1).

(Remainder of Page Intentionally Left Blank)

² Docket No. 42.

WHEREFORE, the Committee respectfully requests that this Court (i) grant the Application, (ii) enter the form of order substantially in the form submitted herewith, and (iii) grant such other and further relief as it deems necessary and appropriate.

The applicant requests entry of the proposed order shortening time.

Dated: April 18, 2024

Respectfully submitted,

By: /s/ James S. Carr
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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) Lorenzo Marinuzzi, Esq. (<i>pro hac vice</i> pending) Theresa A. Foudy, Esq. (admitted <i>pro hac vice</i>) Doug Mannal, Esq. (admitted <i>pro hac vice</i>) Raff Ferraioli, Esq. (admitted <i>pro hac vice</i>) Darren Smolarski, Esq. (NJ Bar No. 307592020) MORRISON & FOERSTER LLP 250 West 55th Street New York, New York 10019-9601 Tel: (212) 468-8000 Fax: (212) 468-7900 Email: lmarinuzzi@mofo.com tfoudy@mofo.com dmannal@mofo.com rferraioli@mofo.com dsmolarski@mofo.com James S. Carr, Esq. Connie Y. Choe, Esq. KELLEY DRYE & WARREN LLP One Jefferson Road, 2 nd Floor Parsippany, NJ 07054 Tel: (973) 503-5900 Fax: (973) 503-5950 Email: jcarr@kelleydrye.com cchoe@kelleydrye.com <i>Proposed Co-Counsel to the Official Committee of Unsecured Creditors</i>	
In re:	Chapter 11
THRASIO HOLDINGS, INC., <i>et al.</i> , Debtors. ¹	Case No. 24-11840 (CMG) (Jointly Administered)

**ORDER SHORTENING TIME PERIOD FOR NOTICE,
SETTING HEARING AND LIMITING NOTICE**

The relief set forth on the following pages, numbers two (2) through three (3) is hereby **ORDERED**.

¹ The last four digits of Debtor Thrasio Holdings, Inc.'s tax identification number are 8327. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' claims and noticing agent at <https://www.kccllc.net/Thrasio>. The Debtors' service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

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Debtors: THRASIO HOLDINGS, INC., *et al.*
Case No. 24-11840 (CMG)
Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE, SETTING HEARING AND LIMITED NOTICE

After review of the application of the Official Committee of Unsecured Creditors (the "Committee"), for a reduction of time for a hearing on the *Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal Its Supplemental Objection to Debtors' Disclosure Statement for the Joint Plan of Reorganization of Thrasio Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code*, under Fed. R. Bankr. P. 9006(c)(1), it is

ORDERED as follows:

1. A hearing will be conducted on the matter on [_____]
at [_____] in the United States Bankruptcy Court, District of New Jersey, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, Courtroom No. 3.

2. The Committee must serve a copy of this Order, and all related documents, on all parties entitled to receive notice under Rule 2002 by email.

3. The Committee must also serve a copy of this Order, and all related documents, on the following parties:

[_____
_____]

by each, any of the following methods selected by the Court:

fax, overnight mail, regular mail, email, hand delivery.

4. Service must be made:

on the same day as the date of this order, or [

within [_____] day(s) of the date of this Order.

5. Notice by telephone:

is not required

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Debtors: THRASIO HOLDINGS, INC., *et al.*
Case No. 24-11840 (CMG)
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HEARING AND LIMITING NOTICE

must be provided to _____

on the same day as the date of this Order, or

within _____ day(s) of the date of this Order.

6. A *Certification of Service* must be filed prior to the hearing date.

7. Any objections to said application:

must be filed with the Court and served on all parties in interest by electronic or overnight mail _____ day(s) prior to the scheduled hearing; or

may be presented orally at the hearing.

8. Court appearances are required to prosecute said application and any objections.

Parties may request to appear by phone by contacting Chambers prior to the return date.