Docket #0314 Date Filed: 04/09/2026

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Lorenzo Marinuzzi (admitted *pro hac vice*)
Doug Mannal (admitted *pro hac vice*)
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Counsel for the Thrasio Legacy Trust

In re:

1 Thrasio One, Inc.

Reorganized Debtor.[1]

Chapter 11

Case No. 24-11850 (CMG)

[1] Formerly jointly administered under *Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG). The last four digits of the Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081.

2411850260409000000000001

CERTIFICATE OF NO OBJECTION REGARDING THE THRASIO LEGACY TRUST'S MOTION FOR ENTRY OF AN ORDER (I) APPROVING OMNIBUS CLAIMS OBJECTION PROCEDURES; AND (II) AUTHORIZING THE THRASIO LEGACY TRUST TO FILE SUBSTANTIVE OMNIBUS OBJECTIONS TO CLAIMS PURSUANT TO BANKRUPTCY RULE 3007(C) AND (D)

The undersigned hereby certifies the following:

1. On March 6, 2026, the Thrasio Legacy Trust (the "Trust") established in the above-captioned case filed its *Motion for Entry of an Order (I) Approving Omnibus Claims Objection Procedures; and (II) Authorizing the Thrasio Legacy Trust to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007(C) and (D)* (the "Motion").[1]

2. Pursuant to the Notice of the Motion, objections or responses to the Motion were required to be filed and served by April 7, 2026 (the "Objection Deadline").

3. Prior to the Objection Deadline, the Trust received comments to the proposed order accompanying the Motion from the Office of the United States Trustee (the "U.S. Trustee") and the Reorganized Debtors.

4. Attached hereto as **Exhibit A** is a revised proposed order granting the relief requested in the Motion (the "Revised Proposed Order"). The Revised Proposed Order incorporates the above-referenced comments from the U.S. Trustee and the Reorganized Debtors, and both parties consent to the entry of the Revised Proposed Order. A redline comparing the Revised Proposed Order against the form of order attached to the Motion is attached hereto as **Exhibit B**.

5. As of April 8, 2026 at 10:00 a.m. (ET), the Trust received no answer, objection, or other responsive pleading to the Motion except as set forth above. The undersigned

[1] Docket No. 309. Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

further certifies that I have reviewed the Court's docket in this case and no answer, objection, or other responsive pleading to the Motion appears thereon.

6. Accordingly, it is hereby requested that the Revised Proposed Order be entered at the earliest convenience of the Court.

Dated: April 8, 2026

KELLEY DRYE & WARREN LLP

/s/ James S. Carr

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Connie Y. Choe, Esq.
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Counsel for the Thrasio Legacy Trust

EXHIBIT A

(Revised Proposed Order)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Counsel for the Thrasio Legacy Trust

In re: 1 Thrasio One, Inc. Reorganized Debtor.[1]	Chapter 11 Case No. 24-11850 (CMG)

[1] Formerly jointly administered under *Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG). The last four digits of the Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081.

**ORDER (I) APPROVING OMNIBUS
CLAIMS OBJECTION PROCEDURES; AND
(II) AUTHORIZING THE THRASIO LEGACY TRUST
AND THE REORGANIZED DEBTORS TO FILE SUBSTANTIVE OMNIBUS
OBJECTIONS TO CLAIMS PURSUANT TO BANKRUPTCY RULE 3007(C) AND (D)**

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

Upon consideration of the *Thrasio Legacy Trust's Motion for Entry of an Order (I) Approving Omnibus Claims Objection Procedures; and (II) Authorizing the Thrasio Legacy Trust to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007(c) and (d)* (the "Motion")[1] filed by the Thrasio Legacy Trust (the "Trust") established in the chapter 11 cases of Thrasio Holdings, Inc. and its affiliates (collectively, the "Debtors"), for entry of an order (this "Order"), (i) approving the Objection Procedures attached hereto, and (ii) authorizing the Trust and the Reorganized Debtors to assert substantive objections to claims in an omnibus format pursuant to Bankruptcy Rule 3007(c) and (d), all as more fully described in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that the venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Trust's notice of the Motion and opportunity for a hearing thereon were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this 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. Notwithstanding anything to the contrary in the Bankruptcy Code, the Bankruptcy Rules, or the Local Rules, and pursuant to Bankruptcy Rule 3007(c), the Trust and the

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

Reorganized Debtors may file Omnibus Objections that include objections to claims on any basis provided for in Bankruptcy Rule 3007(d) and/or the Additional Grounds; *provided, however*, that no single Omnibus Objection may contain more than 100 claims.

3. The Trust and the Reorganized Debtors may file and prosecute any Omnibus Objections in accordance with the Objection Procedures attached hereto as **Exhibit 1**, which are approved, and the other procedural safeguards set forth in Bankruptcy Rule 3007(e).

4. The form of Objection Notice attached hereto as **Exhibit 2** is approved.

5. Nothing in this Order or in the Motion is, or shall be deemed to constitute, any admission as to the validity, nature, amount, extent, or priority of any claim asserted against any of the Debtors in the chapter 11 cases, or as a waiver of any right of the Trust or the Reorganized Debtors to dispute the validity, nature, amount, extent, or priority of, or otherwise object to, either in the same or subsequent objections, on any grounds to any such claims.

6. The Trust and the Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

7. The terms, conditions, and provisions of this Order shall be immediately effective and enforceable upon entry hereof.

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

EXHIBIT 1

(Objection Procedures)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

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Case No. 24-11850 (CMG)

[1] Formerly jointly administered under *Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG). The last four digits of the Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081.

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

On March 6, 2026, the Thrasio Legacy Trust (the "Trust") established in the chapter 11 cases of Thrasio Holdings, Inc. and certain of its affiliates (collectively, the "Debtors"), filed the *Thrasio Legacy Trust's Motion for Entry of an Order (I) Approving Omnibus Claims Objection Procedures; and (II) Authorizing the Thrasio Legacy Trust to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007(c) and (d)* (the "Motion")[2] with the United States Bankruptcy Court for the District of New Jersey (the "Court"). On _____, 2026, the Court entered an order (the "Order")[3] approving the Motion, including these omnibus objection procedures.

OMNIBUS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Trust and the Reorganized Debtors may file omnibus objections (each, an "Omnibus Objection") to claims on the grounds that such claims, in part or in whole:

a. are inconsistent with the Debtors' books and records;

b. fail to specify the asserted claim amount (or only list the claim amount as "unliquidated");

c. fail to sufficiently specify the basis for the claim or provide sufficient supporting documentation in support of such claim;

d. seek recovery of amounts for which the Debtors are not liable;

e. are filed against non-Debtors;

f. are disallowed pursuant to section 502 of the Bankruptcy Code; and/or

g. are disallowed pursuant to the terms of the Plan and/or Confirmation Order.

2. Form of Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of basis.

3. Supporting Documentation. To the extent appropriate, Omnibus Objections may be accompanied by an affidavit or declaration from someone with personal knowledge of the Debtors' books and records and the manner in which they are maintained that states that the affiant or the declarant has reviewed the claims included therein and applicable supporting information

[2] Docket No. 309. Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

[3] Docket No. [__].

and documentation provided therewith, made reasonable efforts to research the claim on the Debtors' books and records, and determined that the books and records do not reflect the debt or the amount of debt that is alleged in the claim.

4. Claims Exhibits. An exhibit listing the claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the claims to which there is a common basis for the Omnibus Objection. Claims for which there is more than one basis for an Omnibus Objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by claimant:

a. the claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;

b. the asserted amount of the claim;

c. the grounds for the Omnibus Objection;

d. a cross-reference to the section of the Omnibus Objection discussing such claim; and

e. other information, as applicable, including: (i) the proposed classification of claims the Trust or the Reorganized Debtors seek to reclassify; (ii) the reduced claim amounts, of claims the Trust seeks to reduce; or (iii) the surviving claims, if any, of groups of claims the Trust or the Reorganized Debtors seek to expunge.

5. Objection Notice. Each Omnibus Objection will be accompanied by an objection notice, substantially in the form annexed to the Order as **Exhibit 2** (the "Objection Notice"), tailored, as appropriate, to address a particular creditor, claim, or objection, which will:

a. describe the basic nature of the Omnibus Objection;

b. inform creditors that their rights may be affected by the Omnibus Objection;

c. describe the procedures for filing a written response (each, a "Response") to the objection, including all relevant dates and deadlines related thereto;

d. identify the hearing date, if applicable, and related information; and

e. describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the chapter 11 case may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served upon (a) the affected claimant party set forth on the Proof of Claim or the applicable schedule of assets and liabilities and their respective attorney of record (if any), (b) the U.S.

Trustee; and (c) parties that have filed a request for service of papers under Bankruptcy Rule 2002 pursuant to the Effective Date Notice.

7. Omnibus Hearings. Each Omnibus Objection shall be set for hearing no less than 30 days after service of the Omnibus Objection (the "Hearing"). In the sole discretion of the Trust or the Reorganized Debtors, as applicable, and after notice to the affected claimant, the Trust or the Reorganized Debtors, as applicable, may adjourn the Hearing on the Omnibus Objection to a subsequent hearing date. For claims subject to an Omnibus Objection and with respect to which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures but such Response is resolved prior to the Hearing, the Trust or the Reorganized Debtors, as applicable, may request at the Hearing that the Court enter an order granting the Omnibus Objection with respect to such claim. If such claims cannot be resolved and a hearing is determined to be necessary, the Trust or the Reorganized Debtors, as applicable, shall file with the Court and serve on the affected claimants a notice of the hearing, to the extent the Trust did not file a notice of hearing previously.

8. Claims Paid or Payable by Third Parties. The Trust or the Reorganized Debtors, as applicable, shall reduce in full a claim, and such claim shall be disallowed without a claim objection having to be Filed and without any further notice to or action, order or approval of the Court, to the extent that the holder of such claim receives payment in full on account of such Claim from a party that is not the Debtors, the Reorganized Debtors or the Trust. To the extent a holder of such claim receives a distribution on account of such claim and receives payment from a party that is not the Debtors, the Reorganized Debtors, or the Trust on account of such claim, such holder shall repay, return, or deliver any distribution to the Trust or the Reorganized Debtors, as applicable, to the extent the holder's total recovery on account of such claim from the third party and under the Plan exceeds the amount of such claim as of the date of any such distribution under the Plan. The Trust, the Reorganized Debtors, and the estates reserve all rights, remedies, claims, and actions against any such holders who fail to repay or return any such distribution.

In the event the Trust or the Reorganized Debtors, as applicable, asserts that a claim held by a claimant should be reduced or disallowed because such claim was partially paid or paid in full by a third-party, the Trust or the Reorganized Debtors, as applicable, shall provide at least fourteen (14) days' notice to such claimant, with an opportunity for such claimant to object and be heard by the Court, prior to reducing or disallowing such claim.

9. Contested Matter. Each claim subject to an Omnibus Objection, along with any Responses thereto, shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such claim. The Trust and the Reorganized Debtors may, in their discretion and in accordance with other orders of the Court, the Plan, or the provisions of the Bankruptcy Code and the Bankruptcy Rules, settle the priority, amount, extent, and validity of such contested claims without any further notice to or action, order, or approval of the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an Omnibus Objection is required to file a Response in accordance with the procedures set forth herein. If a claimant whose claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimants.

11. Response Contents. Each Response must contain the following (at a minimum):

a. a caption stating the name of the Court, the name of the Debtor, the case number, the title of the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;

b. a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to such claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;

c. a copy of any other documentation or other evidence of the claim, to the extent not already included with the claim, upon which the claimant will rely in opposing the Omnibus Objection; *provided, however*, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; *provided further, however*, that the claimant shall disclose to the Trust or the Reorganized Debtors, as applicable, all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints; and

d. the following contact information for the responding party:

(i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Trust or the Reorganized Debtors, as applicable, should serve a reply to the Response, if any; or

(ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.

12. Filing and Service of the Response. A Response will be deemed timely only if it is filed with the Court and *actually received* by 4:00 p.m. (prevailing Eastern Time) on

the day that is twenty-one (21) calendar days from the date the Omnibus Objection is served (the "Response Date") by the following parties:

a. Counsel to the Trust: (i) Morrison & Foerster LLP 250 West 55th Street, New York, NY 10019, Attn: Lorenzo Marinuzzi and Doug Mannal; and (ii) Kelley Drye & Warren LLP, 7 Giralda Farms, Suite 340, Madison, New Jersey 07940, Attn: James S. Carr and Connie Y. Choe;

b. Counsel to the Reorganized Debtors: Cole Schotz P.C., 25 Main Street, Hackensack, NJ 07601, Attn: Michael D. Sirota, Warren A. Usatine, Felice R. Yudkin, Jacob S. Frumkin, and Andreas Milliaressis; and

c. Office of the United States Trustee, Regions 3 & 9, One Newark Center, Suite 2100, Newark, NJ 07102, Attn: Jeffrey N. Sponder and Lauren Bielskie.

13. Discovery. If the Trust or the Reorganized Debtors, as applicable, determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the Trust or the Reorganized Debtors, as applicable, will serve notice on the affected claimant and its counsel of record that the scheduled hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Such notice may be incorporated into the initial agenda letter for the hearing, or may be provided by separate notice.

14. Failure to Respond. A Response that is not filed and served by the Response Deadline in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent reaching an agreement with the Trust or the Reorganized Debtors, as applicable, resolving the Omnibus Objection to a claim (as described in the Objection Notice), failure to timely file and serve a Response as set forth herein may result in the Court granting the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

15. Reply to a Response. The Trust or the Reorganized Debtors, as applicable, shall be permitted to file a reply to any Response no later than two (2) business days before the hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

16. Additional Information. Copies of these procedures, the Motion, or Order or any other pleadings (the "Pleadings") filed in the chapter 11 case are available for free online at the website of Kurtzman Carson Consultants, LLC dba Verita Global at https://www.veritaglobal.net/thrasio. You may also obtain copies of any of the Pleadings filed in the chapter 11 cases for a fee via PACER at http://www.njb.uscourts.gov.

17. Reservation of Rights. NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE TRUST OR THE REORGANIZED DEBTORS TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES,

OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

EXHIBIT 2

(Objection Notice)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Counsel for the Thrasio Legacy Trust

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[1] Formerly jointly administered under *Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG). The last four digits of the Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

NOTICE OF OBJECTION TO YOUR CLAIM

To: _____ [Claim Holder and Counsel, if any]

The [Thrasio Legacy Trust, established in the chapter 11 cases of Thrasio Holdings, Inc. and certain of its affiliates / the Reorganized Debtors], [has/have] filed the enclosed _____ *[Title of Objection]* [which seeks to alter your rights by_____.[2]

[Describe effect of the Objection, i.e., disallowing, reducing, modifying, etc.]

If you disagree with the Objection, you must file a response to the Objection with the Clerk of the Bankruptcy Court at the address below on or before _____.

At the same time, you must also serve a copy of the response upon the following parties:

a. Counsel to the Trust: (i) Morrison & Foerster LLP 250 West 55th Street, New York, NY 10019, Attn: Lorenzo Marinuzzi and Doug Mannal; and (ii) Kelley Drye & Warren LLP, 7 Giralda Farms, Suite 340, Madison, New Jersey 07940, Attn: James S. Carr and Connie Y. Choe;

b. Counsel to the Reorganized Debtors: Cole Schotz P.C., 25 Main Street, Hackensack, NJ 07601, Attn: Michael D. Sirota, Warren A. Usatine, Felice R. Yudkin, Jacob S. Frumkin, and Andreas Milliaressis; and

c. Office of the United States Trustee, Regions 3 & 9, One Newark Center, Suite 2100, Newark, NJ 07102, Attn: Jeffrey N. Sponder and Lauren Bielskie.

IF YOU FILE A RESPONSE, YOU OR YOUR ATTORNEY MUST APPEAR AT A HEARING ON THE OBJECTION THAT WILL BE HELD BEFORE THE HONORABLE CHRISTINE M. GRAVELLE ON _____, AT __:__ _.M. AT THE

[2] Docket No. [___].

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY, COURTROOM #3, 402 EAST STATE STREET, TRENTON, N.J. 08608.

IF YOU DO NOT RESPOND TO THE OBJECTION, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

EXHIBIT B

(Redline of Revised Proposed Order)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

1 Thrasio One, Inc.

Reorganized Debtor.[1]

Chapter 11

Case No. 24-11850 (CMG)

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ORDER (I) APPROVING OMNIBUS ~~CLAIMS~~ CLAIMS OBJECTION PROCEDURES; AND (II) AUTHORIZING THE THRASIO LEGACY TRUST AND THE REORGANIZED DEBTORS TO FILE SUBSTANTIVE OMNIBUS OBJECTIONS TO CLAIMS PURSUANT TO BANKRUPTCY RULE 3007(C) AND (D)

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

Upon consideration of the *Thrasio Legacy Trust's Motion for Entry of an Order (I) Approving Omnibus Claims Objection Procedures; and (II) Authorizing the Thrasio Legacy Trust to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007(c) and (d)* (the "Motion")[1] filed by the Thrasio Legacy Trust (the "Trust") established in the chapter 11 cases of Thrasio Holdings, Inc. and its affiliates (collectively, the "Debtors"), for entry of an order (this "Order"), (i) approving the Objection Procedures attached hereto, and (ii) authorizing the Trust and the Reorganized Debtors to assert substantive objections to claims in an omnibus format pursuant to Bankruptcy Rule 3007(c) and (d), all as more fully described in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that the venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Trust's notice of the Motion and opportunity for a hearing thereon were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

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

2. Notwithstanding anything to the contrary in the Bankruptcy Code, the Bankruptcy Rules, or the Local Rules, and pursuant to Bankruptcy Rule 3007(c), the Trust and the Reorganized Debtors may file Omnibus Objections that include objections to claims on any basis provided for in Bankruptcy Rule 3007(d) and/or the Additional Grounds; *provided, however*, that no single Omnibus Objection may contain more than 100 claims.

3. The Trust and the Reorganized Debtors may file and prosecute any Omnibus Objections in accordance with the Objection Procedures attached hereto as **Exhibit 1**, which are approved, and the other procedural safeguards set forth in Bankruptcy Rule 3007(e).

4. The form of Objection Notice attached hereto as **Exhibit 2** is approved.

5. Nothing in this Order or in the Motion is, or shall be deemed to constitute, any admission as to the validity, nature, amount, extent, or priority of any claim asserted against any of the Debtors in the chapter 11 cases, or as a waiver of any right of the Trust or the Reorganized Debtors to dispute the validity, nature, amount, extent, or priority of, or otherwise object to, either in the same or subsequent objections, on any grounds to any such claims.

6. The Trust ~~is~~and the Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

7. The terms, conditions, and provisions of this Order shall be immediately effective and enforceable upon entry hereof.

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

EXHIBIT 1

(Objection Procedures)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Lorenzo Marinuzzi (admitted *pro hac vice*)
Doug Mannal (admitted *pro hac vice*)
Jamie A. Levitt
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alawrence@mofo.com

-and-

James S. Carr
Connie Y. Choe
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cchoe@kelleydrye.com

Counsel for the Thrasio Legacy Trust

In re:

1 Thrasio One, Inc.

Reorganized Debtor.[1]

Chapter 11

Case No. 24-11850 (CMG)

[1] Formerly jointly administered under *Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG). The last four digits of the Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081.

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

On March ~~__~~6, 2026, the Thrasio Legacy Trust (the "Trust") established in the chapter 11 cases of Thrasio Holdings, Inc. and certain of its affiliates (collectively, the "Debtors"), filed the *Thrasio Legacy Trust's Motion for Entry of an Order (I) Approving Omnibus Claims Objection Procedures; and (II) Authorizing the Thrasio Legacy Trust to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007(c) and (d)* (the "Motion")[2] with the United States Bankruptcy Court for the District of New Jersey (the "Court"). On _____, 2026, the Court entered an order (the "Order")[3] approving the Motion, including these omnibus objection procedures.

OMNIBUS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Trust and the Reorganized Debtors may file omnibus objections (each, an "Omnibus Objection") to claims on the grounds that such claims, in part or in whole:

   a. are inconsistent with the Debtors' books and records;

   b. fail to specify the asserted claim amount (or only list the claim amount as "unliquidated");

   c. fail to sufficiently specify the basis for the claim or provide sufficient supporting documentation in support of such claim;

   d. seek recovery of amounts for which the Debtors are not liable;

   e. are filed against non-Debtors;

   f. are disallowed pursuant to section 502 of the Bankruptcy Code; and/or

   g. are disallowed pursuant to the terms of the Plan and/or Confirmation Order.

2. Form of Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of basis.

3. Supporting Documentation. To the extent appropriate, Omnibus Objections may be accompanied by an affidavit or declaration from someone with personal

[2] Docket No. ~~[__]~~309. Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

[3] Docket No. [__].

knowledge of the Debtor~~'~~s' books and records and the manner in which they are maintained that states that the affiant or the declarant has reviewed the claims included therein and applicable supporting information and documentation provided therewith, made reasonable efforts to research the claim on the Debtor~~'~~s' books and records, and determined that the books and records do not reflect the debt or the amount of debt that is alleged in the claim.

4. Claims Exhibits. An exhibit listing the claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the claims to which there is a common basis for the Omnibus Objection. Claims for which there is more than one basis for an Omnibus Objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by claimant:

a. the claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;

b. the asserted amount of the claim;

c. the grounds for the Omnibus Objection;

d. a cross-reference to the section of the Omnibus Objection discussing such claim; and

e. other information, as applicable, including: (i) the proposed classification of claims the Trust or the Reorganized Debtors seek~~s~~ to reclassify; (ii) the reduced claim amounts, of claims the Trust seeks to reduce; or (iii) the surviving claims, if any, of groups of claims the Trust or the Reorganized Debtors seek~~s~~ to expunge.

5. Objection Notice. Each Omnibus Objection will be accompanied by an objection notice, substantially in the form annexed to the Order as **Exhibit 2** (the "Objection Notice"), tailored, as appropriate, to address a particular creditor, claim, or objection, which will:

a. describe the basic nature of the Omnibus Objection;

b. inform creditors that their rights may be affected by the Omnibus Objection;

c. describe the procedures for filing a written response (each, a "Response") to the objection, including all relevant dates and deadlines related thereto;

d. identify the hearing date, if applicable, and related information; and

e. describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the chapter 11 case may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served upon (a) the affected claimant party set forth on the Proof of Claim or the applicable schedule of assets and liabilities and their respective attorney of record (if any), (b) the U.S. Trustee; and (c) parties that have filed a request for service of papers under Bankruptcy Rule 2002 pursuant to the Effective Date Notice.

7. Omnibus Hearings. Each Omnibus Objection shall be set for hearing no less than 30 days after service of the Omnibus Objection (the "Hearing"). In the ~~Trust's~~ sole discretion of the Trust or the Reorganized Debtors, as applicable, and after notice to the affected claimant, the Trust or the Reorganized Debtors, as applicable, may adjourn the Hearing on the Omnibus Objection to a subsequent hearing date. For claims subject to an Omnibus Objection and with respect to which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures but such Response is resolved prior to the Hearing, the Trust or the Reorganized Debtors, as applicable, may request at the Hearing that the Court enter an order granting the Omnibus Objection with respect to such claim. If such claims cannot be resolved and a hearing is determined to be necessary, the Trust or the Reorganized Debtors, as applicable, shall file with the Court and serve on the affected claimants a notice of the hearing, to the extent the Trust did not file a notice of hearing previously.

8. Claims Paid or Payable by Third Parties. The Trust or the Reorganized Debtors, as applicable, shall reduce in full a claim, and such claim shall be disallowed without a claim objection having to be Filed and without any further notice to or action, order or approval of the Court, to the extent that the holder of such claim receives payment in full on account of such Claim from a party that is not the Debtors, the Reorganized Debtors or the Trust. To the extent a holder of such claim receives a distribution on account of such claim and receives payment from a party that is not the Debtors, the Reorganized Debtors, or the Trust on account of such claim, such holder shall repay, return, or deliver any distribution to the Trust or the Reorganized Debtors, as applicable, to the extent the holder's total recovery on account of such claim from the third party and under the Plan exceeds the amount of such claim as of the date of any such distribution under the Plan. The Trust, the Reorganized Debtors, and the ~~Debtor's~~ Eestates reserve all rights, remedies, claims, and actions against any such holders who fail to repay or return any such distribution.

In the event the Trust or the Reorganized Debtors, as applicable, asserts that a claim held by a claimant should be reduced or disallowed because such claim was partially paid or paid in full by a third-party, the Trust or the Reorganized Debtors, as applicable, shall provide at least fourteen (14) days' notice to such claimant, with an opportunity for such claimant to object and be heard by the Court, prior to reducing or disallowing such claim.

9. Contested Matter. Each claim subject to an Omnibus Objection, along with any Responses thereto, shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such claim. The Trust and the Reorganized Debtors may, in ~~its~~their discretion and in

accordance with other orders of the Court, the Plan, or the provisions of the Bankruptcy Code and the Bankruptcy Rules, settle the priority, amount, extent, and validity of such contested claims without any further notice to or action, order, or approval of the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an Omnibus Objection is required to file a Response in accordance with the procedures set forth herein. If a claimant whose claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimants.

11. Response Contents. Each Response must contain the following (at a minimum):

a. a caption stating the name of the Court, the name of the Debtor, the case number, the title of the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;

b. a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to such claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;

c. a copy of any other documentation or other evidence of the claim, to the extent not already included with the claim, upon which the claimant will rely in opposing the Omnibus Objection; *provided, however*, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; *provided further, however*, that the claimant shall disclose to the Trust or the Reorganized Debtors, as applicable, all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints; and

d. the following contact information for the responding party:

(i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Trust or the Reorganized Debtors, as applicable, should serve a reply to the Response, if any; or

(ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.

12. Filing and Service of the Response. A Response will be deemed timely only if it is filed with the Court and *actually received* by 4:00 p.m. (prevailing Eastern Time) on the day that is twenty-one (21) calendar days from the date the Omnibus Objection is served (the "Response Date") by the following parties:

a. Counsel to the Trust: (i) Morrison & Foerster LLP 250 West 55th Street, New York, NY 10019, Attn: Lorenzo Marinuzzi and Doug Mannal; and (ii) Kelley Drye & Warren LLP, 7 Giralda Farms, Suite 340, Madison, New Jersey 07940, Attn: James S. Carr and Connie Y. Choe;

b. Counsel to the Reorganized Debtors: Cole Schotz P.C., 25 Main Street, Hackensack, NJ 07601, Attn: Michael D. Sirota, Warren A. Usatine, Felice R. Yudkin, Jacob S. Frumkin, and Andreas Milliaressis; and

~~Counsel to the Trust~~	~~United States Trustee~~
~~Morrison & Foerster LLP~~ ~~250 West 55th Street~~ ~~New York, NY 10019~~ ~~Attn: Lorenzo Marinuzzi~~ ~~Attn: Doug Mannal~~ ~~Kelley Drye & Warren LLP~~ ~~7 Giralda Farms, Suite 340~~ ~~Madison, New Jersey 07940~~ ~~Attn: James S. Carr~~ ~~Attn: Connie Y. Choe~~	~~Office of the United States Trustee, Regions 3 & 9~~ ~~One Newark Center, Suite 2100~~ ~~Newark, NJ 07102~~ ~~Attn: Jeffrey N. Sponder~~ ~~Attn: Lauren Bielskie~~

c. Office of the United States Trustee, Regions 3 & 9, One Newark Center, Suite 2100, Newark, NJ 07102, Attn: Jeffrey N. Sponder and Lauren Bielskie.

13. Discovery. If the Trust or the Reorganized Debtors, as applicable, determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the Trust or the Reorganized Debtors, as applicable, will serve notice on the affected claimant and its counsel of record that the scheduled hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Such notice may be incorporated into the initial agenda letter for the hearing, or may be provided by separate notice.

14. Failure to Respond. A Response that is not filed and served by the Response Deadline in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent reaching an agreement with the Trust or the Reorganized Debtors, as applicable, resolving the Omnibus Objection to a claim (as described in the Objection Notice), failure to timely file and serve a Response as set forth herein may result in the Court granting the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

15. Reply to a Response. The Trust or the Reorganized Debtors, as applicable, shall be permitted to file a reply to any Response no later than two (2) business days before the hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

16. Additional Information. Copies of these procedures, the Motion, or Order or any other pleadings (the "Pleadings") filed in the chapter 11 case are available for free online at the website of Kurtzman Carson Consultants, LLC dba Verita Global at https://www.veritaglobal.net/thrasio. You may also obtain copies of any of the Pleadings filed in the chapter 11 cases for a fee via PACER at http://www.njb.uscourts.gov.

17. Reservation of Rights. NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE TRUST OR THE REORGANIZED DEBTORS TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

EXHIBIT 2

(Objection Notice)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Lorenzo Marinuzzi (admitted *pro hac vice*)
Doug Mannal (admitted *pro hac vice*)
Jamie A. Levitt
Theresa A. Foudy (admitted *pro hac vice*)
J. Alexander Lawrence (admitted *pro hac vice*)
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dmannal@mofo.com
jlevitt@mofo.com
tfoudy@mofo.com
alawrence@mofo.com

-and-

James S. Carr
Connie Y. Choe
KELLEY DRYE & WARREN LLP
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Madison, New Jersey 07940
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Facsimile: (973) 503-5950
Email: jcarr@kelleydrye.com
cchoe@kelleydrye.com

Counsel for the Thrasio Legacy Trust

In re:

1 Thrasio One, Inc.

Reorganized Debtor.[1]

Chapter 11

Case No. 24-11850 (CMG)

[1] Formerly jointly administered under *Thrasio Holdings, Inc.*, Case No. 24-11840 (CMG). The last four digits of the Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

NOTICE OF OBJECTION TO YOUR CLAIM

To: _____ [Claim Holder and Counsel, if any]

The [Thrasio Legacy Trust, established in the chapter 11 cases of Thrasio Holdings, Inc. and certain of its affiliates / the Reorganized Debtors], [has/have] filed the enclosed _____ *[Title of Objection]* [which seeks to alter your rights by _____.[2]

[Describe effect of the Objection, i.e., disallowing, reducing, modifying, etc.]

If you disagree with the Objection, you must file a response to the Objection with the Clerk of the Bankruptcy Court at the address below on or before _____, 2026.

At the same time, you must also serve a copy of the response upon the following parties:

~~Counsel to the Trust~~	~~United States Trustee~~
~~Morrison & Foerster LLP~~ ~~250 West 55th Street~~ ~~New York, NY 10019-9601~~ ~~Attn: Lorenzo Marinuzzi~~ ~~Attn: Doug Mannal~~ ~~Kelley Drye & Warren LLP~~ ~~7 Giralda Farms, Suite 340~~	~~Office of the United States Trustee,~~ ~~Regions 3 & 9~~ ~~One Newark Center, Suite 2100~~ ~~Newark, NJ 07102~~ ~~Attn: Jeffrey N. Sponder~~ ~~Attn: Lauren Bielskie~~

[2] Docket No. [___].

~~Madison, New Jersey 07940~~ ~~Attn: James S. Carr~~ ~~Attn: Connie Y. Choe~~	

a. Counsel to the Trust: (i) Morrison & Foerster LLP 250 West 55th Street, New York, NY 10019, Attn: Lorenzo Marinuzzi and Doug Mannal; and (ii) Kelley Drye & Warren LLP, 7 Giralda Farms, Suite 340, Madison, New Jersey 07940, Attn: James S. Carr and Connie Y. Choe;

b. Counsel to the Reorganized Debtors: Cole Schotz P.C., 25 Main Street, Hackensack, NJ 07601, Attn: Michael D. Sirota, Warren A. Usatine, Felice R. Yudkin, Jacob S. Frumkin, and Andreas Milliaressis; and

c. Office of the United States Trustee, Regions 3 & 9, One Newark Center, Suite 2100, Newark, NJ 07102, Attn: Jeffrey N. Sponder and Lauren Bielskie.

IF YOU FILE A RESPONSE, YOU OR YOUR ATTORNEY MUST APPEAR AT A HEARING ON THE OBJECTION THAT WILL BE HELD BEFORE THE HONORABLE CHRISTINE M. GRAVELLE ON _____, ~~2026~~ AT __:__ _.M. AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY, COURTROOM #3, 402 EAST STATE STREET, TRENTON, N.J. 08608.

IF YOU DO NOT RESPOND TO THE OBJECTION, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

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Move To	0
Table Insert	0
~~Table Delete~~	2
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Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	79