James S. Carr
Connie Y. Choe
KELLEY DRYE & WARREN LLP
7 Giralda Farms, Suite 340
Madison, NJ 07940
Telephone: (973) 503-5900
Facsimile: (973) 503-5950
Email: jcarr@kelleydrye.com
cchoe@kelleydrye.com

Counsel to the Thrasio Legacy Trust

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*)
MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019-9601
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Email: lmarinuzzi@mofo.com
dmannal@mofo.com
jlevitt@mofo.com
tfoudy@mofo.com
alawrence@mofo.com

Counsel to the Thrasio Legacy Trust

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re: 1 THRASIO ONE, INC., Reorganized Debtor.[1]	Chapter 11 Case No. 24-11850 (CMG) **Hearing Date:** **July 7, 2026** **Hearing Time:** **10:00 a.m. (ET)** **Response Deadline:** **June 30, 2026**

NOTICE OF THRASIO LEGACY TRUST'S FOURTH MOTION FOR ENTRY OF AN ORDER EXTENDING THE PERIOD WITHIN WHICH THE TRUST MAY OBJECT TO CLAIMS

PLEASE TAKE NOTICE that on July 7, 2026 at 10:00 a.m. (ET), or as soon thereafter as counsel may be heard, the Thrasio Legacy Trust (the "Trust"), by and through META Advisors LLC, solely in its capacity as trustee (the "Trustee"), shall move for entry of an order extending the period within which the Trust may object to general unsecured claims from June 15, 2026 through and including December 14, 2026 (the "Motion"), before the Honorable Christine

[1] The last four digits of 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.

M. Gravelle, United States Bankruptcy Judge, United States Bankruptcy Court for the District of New Jersey, 402 East State Street, Courtroom 3, Trenton, NJ 08608.

PLEASE TAKE FURTHER NOTICE that the Motion sets forth the relevant factual bases upon which the relief requested should be granted. A proposed order granting the relief requested in the Motion is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection, and (iii) be filed with the Clerk of the Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the "General Order") and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the "Supplemental Commentary") (the General Order, the Supplemental Commentary and the User's Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above, *i.e.*, on or prior to June 30, 2026.

PLEASE TAKE FURTHER NOTICE that if you file an objection, you or your attorney must appear at a hearing on the Motion that will be held before the Honorable Christine M. Gravelle on July 7, 2026 at 10:00 a.m. (ET) at the United States Bankruptcy Court, 402 East State Street, Courtroom 3, Trenton, NJ 08608, with the option to appear via Court Solutions in lieu of in-person participation. Please be advised that the Bankruptcy Court has directed that parties

who wish to appear via Court Solutions should submit their reservation requests to Court Solutions no later than noon on the day prior to the hearing, *i.e.*, on July 6, 2026 at 12:00 p.m. (ET).

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

Dated: June 11, 2026

KELLEY DRYE & WARREN LLP

/s/ James S. Carr
James S. Carr
Connie Y. Choe
7 Giralda Farms, Suite 340
Madison, NJ 07940
Telephone: (973) 503-5900
Facsimile: (973) 503-5950
Email: jcarr@kelleydrye.com
cchoe@kelleydrye.com

-and-

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New York, New York 10019-9601
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Email: lmarinuzzi@mofo.com
dmannal@mofo.com
jlevitt@mofo.com
tfoudy@mofo.com
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James S. Carr
Connie Y. Choe
KELLEY DRYE & WARREN LLP
7 Giralda Farms, Suite 340
Madison, NJ 07940
Telephone: (973) 503-5900
Facsimile: (973) 503-5950
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MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019-9601
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Email: lmarinuzzi@mofo.com
dmannal@mofo.com
jlevitt@mofo.com
tfoudy@mofo.com
alawrence@mofo.com

Counsel to the Thrasio Legacy Trust

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re: 1 THRASIO ONE, INC., Reorganized Debtor.[1]	Chapter 11 Case No. 24-11850 (CMG) **Hearing Date:** **July 7, 2026** **Hearing Time:** **10:00 a.m. (ET)** **Response Deadline:** **June 30, 2026**

THRASIO LEGACY TRUST'S FOURTH MOTION FOR ENTRY OF AN ORDER EXTENDING THE PERIOD WITHIN WHICH THE TRUST MAY OBJECT TO CLAIMS

The Thrasio Legacy Trust (the "Trust"), by and through META Advisors LLC, solely in its capacity as trustee (the "Trustee"), submits this motion (the "Motion") for the entry of an order pursuant to section 105(a) of Title 11 of the United States Code (the "Bankruptcy Code"), Rule 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 3007-1(c) of the Local Rules of the United States Bankruptcy Court for the District of New

[1] The last four digits of 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.

Jersey (the "Local Rules"), extending the period within which the Trust may object to General Unsecured Claims filed against the estates of Thrasio Holdings, Inc. and certain of its affiliates (collectively, the "Debtors") by 182 days, from June 15, 2026 through and including December 14, 2026.[2] In support of this Motion, the Trust respectfully represents as follows:

Jurisdiction

1. The Bankruptcy Court has jurisdiction over this matter under 28 U.S.C. § 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this chapter 11 case in this district is proper under 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested are section 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006(b)(1), and Local Rule 3007-1(c).

Background

A. General Background

3. On February 28, 2024 (the "Petition Date"), each of the Debtors commenced with this Bankruptcy Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors continued to operate their businesses and manage their assets as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code until the Effective Date of the Plan.

4. In accordance with the *Order Pursuant to Fed. R. Bankr. P. 1015(b) Directing Joint Administration of Related Chapter 11 Cases*, the Debtors' cases were jointly administered pursuant to Bankruptcy Rule 1015 until the closure of all of the Debtors' cases other than the chapter 11 case of 1 Thrasio One, Inc.[3]

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[2] Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the *First Amended Joint Plan of Reorganization of Thrasio Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Further Technical Modifications)* (the "Plan"). [Case No. 24-11840, Docket No. 1125].

[3] Case No. 24-11840, Docket Nos. 64, 1983.

5. On April 1, 2024, each of the Debtors filed their respective schedules of assets and liabilities (as amended, the "Schedules") pursuant to Bankruptcy Rule 1007.

6. On June 13, 2024, the Bankruptcy Court entered its *Findings of Fact, Conclusions of Law, and Order Confirming the First Amended Joint Plan of Reorganization of Thrasio Holdings, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the "Confirmation Order") confirming the Plan.[4] On June 18, 2024 (the "Effective Date"), the Plan became effective.[5]

B. Appointment, Rights, Powers, and Duties of the Trust

7. By operation of the Plan and the Confirmation Order, the Trust was created in accordance with the terms of the *Thrasio Legacy Trust Agreement and Declaration of Trust* (the "Trust Agreement" and, together with the Plan and Confirmation Order, the "Plan Documents") on the Effective Date.[6] Pursuant to the Plan Documents, the Debtors contributed to the Trust the Vested Causes of Action against various parties, including certain of the Debtors' former officers and directors.[7] The Plan Documents provide that the Trust's primary purpose is to investigate and pursue the Vested Causes of Action for the benefit of the holders of Class 4 Other General Unsecured Claims (the "General Unsecured Claims") and Class 4 First Lien Deficiency Claims (the "Deficiency Claims").[8]

8. Under the Plan Documents, the Trust has the sole authority to file and prosecute objections to General Unsecured Claims.[9] The Trust also has the authority to settle,

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4 Case No. 24-11840, Docket No. 1124.

5 Case No. 24-11840, Docket No. 1143.

6 Plan, § IV.J.

7 *Id.*

8 *Id.*

9 *Id.*, § VII.B.

compromise, withdraw, litigate to judgment or otherwise resolve objections to General Unsecured Claims.[10]

C. The Bar Date and Claims Objection Deadline

9. On April 4, 2024, the Bankruptcy Court entered an order establishing certain dates and deadlines for filing proofs of claim in the Debtors' chapter 11 cases.[11] Specifically, the Bankruptcy Court approved a general bar date of May 6, 2024, applicable to all persons and entities asserting a "claim" (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date, including claims pursuant to section 503(b)(9) of the Bankruptcy Code.[12] Pursuant to the Plan Documents, the Bankruptcy Court also set July 18, 2024 as the deadline for filing proofs of claim arising from the rejection of any executory contract or unexpired lease pursuant to the Plan or Confirmation Order.[13]

10. Approximately 1,900 claims were included on the Debtors' schedules. In addition, to date, 264 Proofs of Claim have been filed against the Debtors in the aggregate amount of over $171 million.

11. Pursuant to the Plan, the original deadline for objections to General Unsecured Claims was 180 days after the Effective Date, subject to further extension by the Bankruptcy Court.[14] Accordingly, the initial claims objection deadline with respect to General Unsecured Claims was December 16, 2024. After giving effect to three previous extensions

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10 *Id.*

11 Case No. 24-11840, Docket No. 292.

12 *Id.*

13 Plan, § V.C.

14 *Id.*, § I.A.27 (defining "Claims Objection Bar Date", as relevant to General Unsecured Claims, as "the date that is the later of … [(a)] 180 days after the Effective Date and (b) such other period of limitation as may be specifically fixed by the Debtors, the Reorganized Debtors, or Thrasio Legacy Trust, as applicable, or by an order of the Bankruptcy Court for objecting to such Claims.").

granted by the Bankruptcy Court,[15] the Trust's current deadline to file objections to General Unsecured Claims is June 15, 2026 (the "Claims Objection Deadline").

Relief Requested

12. By this Motion, and pursuant to Bankruptcy Rule 9006(b)(1) and Local Rule 3007-1(c), the Trust seeks an extension of the Claims Objection Deadline as to General Unsecured Claims, for 182 days, through and including December 14, 2026.[16] The Trust further requests that the order approving this Motion be without prejudice to the rights of the Trust to seek further extension of the Claims Objection Deadline.

Basis for Relief

13. As discussed above, the Plan vests in the Trust the ability to object to General Unsecured Claims. While the Plan set an initial date by which such objections must be raised, both the Plan and Local Rule 3007-1 expressly contemplate that the Claims Objection Deadline may be extended by order of the Bankruptcy Court.[17] In particular, Local Rule 3007-1 provides, in relevant part, that "[a] request for an extension of the time to object to the allowance of a claim must be brought by motion filed before the expiration of the time to object."[18]

14. Bankruptcy Rule 9006(b) also makes clear that the Bankruptcy Court may extend unexpired time periods with or without notice. Specifically, Bankruptcy Rule 9006(b) states in relevant part that:

> (1) *In General* . . . when an act is required or allowed to be done at or within a specified period by [the Bankruptcy Rules] or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice

[15] Case No. 24-11850, Docket Nos. 256, 281 and 300.

[16] As a 180-day extension would fall on a Saturday, the Motion seeks a 182-day extension until Monday, December 14, 2026.

[17] *See* Plan § I.A.27

[18] D.N.J. LBR 3007-1(c).

> order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order[.][19]

The Claims Objection Deadline, as previously extended by this Bankruptcy Court, has not expired as of the filing of the Motion, and accordingly, the Bankruptcy Court is authorized to grant the relief requested herein.

15. Following the Effective Date of the Plan, the Trust initially deferred all claims reconciliation for two important, but related, reasons: (i) the Trust needed to focus its limited resources on the pursuit of Vested Causes of Action, the anticipated proceeds of which represented the only possibility for a meaningful recovery for Trust beneficiaries in this chapter 11 case; and (ii) until the amount (if any) of net proceeds from Vested Causes of Action resulting from settlement or judgment could be known, the Trust would not be able to determine the appropriate materiality threshold for claims review.

16. The Trust's diligent work to monetize Vested Causes of Action culminated in a settlement approved by the Bankruptcy Court on January 27, 2026, which brought $65 million into the Trust (the "Settlement Proceeds") to be divided, net of expenses, between Thrasio Legacy Trust A Interests (*i.e.*, holders of Allowed Deficiency Claims) and Thrasio Legacy Trust B Interests (*i.e.*, holders of Allowed General Unsecured Claims) pursuant to the payment waterfall embodied in the Plan. [20]

17. With the Vested Causes of Action fully and finally resolved, and with the Settlement Proceeds having been received, the Trust recently became positioned to address claims, which it began in earnest immediately. Because the First Lien Deficiency Claims were fixed and

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[19] Fed. R. Bankr. P. 9006(b)(1).

[20] *META Advisors, LLC v. Silberstein, et al.* (Adv. Pro. 24-01637, Docket No. 154).

Allowed pursuant to the Plan, between March 31, 2026 and May 29, 2026, the Trust made final distributions to the Thrasio Legacy Trust A Interests. Substantially contemporaneous with those efforts, with respect to Thrasio Legacy Trust B Interests, on March 6, 2026, the Trust 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),*[21] which was approved by the Bankruptcy Court on April 14, 2026.[22] Further, on March 13, 2026, the Trust filed its *First Omnibus Objection of the Thrasio Legacy Trust to Certain Proofs of Claim (Late-Filed, Amended, Duplicative, Satisfied and Equity)* (the "First Omnibus Objection"),[23] which was sustained by the Bankruptcy Court on April 10, 2026.[24]

18. In the three months that have passed since the Trust was funded with the **Settlement** Proceeds, the Trust has eliminated 44 General Unsecured Claims, reducing the pool by more than $54.2 million plus unliquidated amounts. The Trust expects to file a second omnibus claim objection in the near term, and is engaging with individual claimants on an ongoing basis in an attempt to resolve claims consensually.

19. Without limiting the generality of the foregoing, the Trust is currently in the process of reconciling certain General Unsecured Claims arising from earnout provisions in various pre-petition agreements with the Debtors (the "Earnout Claims"). These Earnout Claims represent a significant portion of the remaining claims pool and, because several were asserted wholly or partially in unliquidated amounts, must be resolved or otherwise reserved for before the

[21] Case No. 24-11850, Docket No. 309.

[22] Case No. 24-11850, Docket No. 318.

[23] Case No. 24-11850, Docket No. 311.

[24] Case No. 24-11850, Docket No. 316.

Trust can make any distribution to holders of General Unsecured Claims, whether interim or final. If necessary, the Trust may need to file substantive objections to objectionable Earnout Claims that cannot be resolved on a consensual basis.

20. In short, the Trust has made tremendous progress in reviewing, reconciling, objecting to and resolving General Unsecured Claims in the short time it has had funds to do so, but the Trust needs more time to complete its work. The Trust is not seeking an extension of the Claims Objection Deadline for purposes of delay, nor will an extension affect or prejudice any claimant's substantive defense(s) to any objection. Rather, the extension is intended to promote the efficient administration of this case and to preserve the Trust's funding, in accordance with its primary goal of maximizing value for the Trust's remaining beneficiaries.

21. Absent the requested extension of the Claims Objection Deadline, the Trust will either be precluded from challenging invalid, misclassified, and/or overstated claims, or it will be forced to incur costs associated with filing protective objections without the benefit of a comprehensive review and analysis.

22. For the reasons set forth above, the Trust submits that extending the Claims Objection Deadline by 182 days, through and including December 14, 2026, is necessary, prudent, and in the best interests of all stakeholders. This is the fourth requested extension.

23. Pursuant to the *Order Establishing Certain Notice, Case Management, and Administrative Procedures*, the Claims Objection Deadline shall automatically be extended until the Bankruptcy Court rules on this Motion, without the necessity of a bridge order.[25]

[25] Case No. 24-11840, Docket No. 69, Ex. 1, ¶ 24.

Notice

24. Notice of this Motion has been provided to the following parties, or their counsel, if known: (a) the Office of the United States Trustee; and (b) all parties that have filed a request for service of papers under Bankruptcy Rule 2002. The Trust respectfully submits that such notice is sufficient under the circumstances.

WHEREFORE, the Trust respectfully requests that the Bankruptcy Court enter the proposed order, extending the Claims Objection Deadline as requested herein, and such other and further relief as is just and proper.

Dated: June 11, 2026

KELLEY DRYE & WARREN LLP

/s/ James S. Carr
James S. Carr
Connie Y. Choe
7 Giralda Farms, Suite 340
Madison, NJ 07940
Telephone: (973) 503-5900
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alawrence@mofo.com

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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

James S. Carr
Connie Y. Choe
KELLEY DRYE & WARREN LLP
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Madison, NJ 07940
Telephone: (973) 503-5900
Facsimile: (973) 503-5950
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Email: lmarinuzzi@mofo.com
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tfoudy@mofo.com
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Counsel to the Thrasio Legacy Trust

In re:	Chapter 11
1 THRASIO ONE, INC.,	Case No. 24-11850 (CMG)
Reorganized Debtor.[1]	

ORDER EXTENDING THE PERIOD WITHIN WHICH THE TRUST MAY OBJECT TO CLAIMS

The relief set forth on page numbered two (2), is hereby **ORDERED**:

Upon consideration of *Thrasio Legacy Trust's Fourth Motion for Entry of an Order Extending the Period Within Which the Trust May Object to Claims* (the "Motion")[2] filed by the

[1] The last four digits of 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.

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

Thrasio Legacy Trust (the "Trust"), by and through META Advisors LLC, solely in its capacity as trustee (the "Trustee"), and it appearing that the relief requested in the Motion is in the best interests of the estate, its creditors, and all other parties in interest; and the Bankruptcy Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in this Bankruptcy Court pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that no other or further notice need be provided; and no objections to the Motion having been filed; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The time period within which the Trust may file objections to General Unsecured Claims is enlarged and extended through and including December 14, 2026 (the "Claims Objection Deadline").

3. This Order shall be without prejudice to the rights of the Trust to seek further extensions of the Claims Objection Deadline.

4. This Bankruptcy Court shall retain exclusive jurisdiction to interpret and enforce the provisions of this Order in all respects and further to hear and determine all matters arising from the construction and implementation of this Order.