IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
WEST MARINE, INC., *et al.*,[1]	)	Case No. 26-10794 (KBO)
Debtors.	)	(Jointly Administered)
	)	**Re: Docket No. 49**

DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) GRANTING THE DEBTORS LEAVE AND PERMISSION TO FILE REPLY IN SUPPORT OF THE DEBTORS' BIDDING PROCEDURES MOTION AND (II) GRANTING RELATED RELIEF

The above-captioned debtors and debtors in possession (collectively, the "Debtors") state as follows in support of this motion (this "Motion for Leave"):

Relief Requested

1. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"): (a) granting the Debtors leave and permission to file the Debtors' reply (the "Reply") in support of the *Debtors' Motion for Entry of an Order (I)(A) Approving Bidding Procedures, (B) Authorizing the Debtors to Enter Into One or More Stalking Horse Purchase Agreements and Provide Bid Protections, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures, and (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof, (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims,*

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: West Marine, Inc. (5502); Marine One Holdco, LLC (2231); Marine One Parent, Inc. (0402); Rising Tide Holdings Inc. (2628); Rising Tide Parent Inc. (6153); Seascapes, Inc. (3739); W Marine Management Company, Inc. (4151); and West Marine Products, Inc. (4523). For purposes of these chapter 11 cases, the Debtors' service address is West Marine Headquarters, 1 East Broward Blvd., Suite 200, Fort Lauderdale, FL 33301.

Interests, and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Docket No. 49] (the "Bidding Procedures Motion");[2] and (b) granting related relief.

Jurisdiction and Venue

2. 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 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. The Debtors confirm their consent, 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 for Leave 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.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested herein are section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 9006-1(d).

Background

5. West Marine is the leading integrated, omni channel provider of aftermarket products to the boating, fishing, sailing, and watersports markets in the United States. For more

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

than fifty years, West Marine has been recognized as a principal resource for cruisers, sailors, anglers, fishers, and other boating enthusiasts. Founded in 1968 in Sunnyvale, California, West Marine employs approximately 2,600 crew members and operates a retail footprint of more than 200 stores across thirty-four states and Puerto Rico, as well as a digital footprint through its eCommerce websites that reach domestic, international, and professional customers.

6. On May 17, 2026, each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On May 18, 2026, the Court entered an order directing the joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1 [Docket No. 43]. No request for the appointment of a trustee or examiner has been made in these chapter 11 cases.

7. On May 29, 2026, the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an official committee of unsecured creditors (the "Committee") pursuant to section 1102 of the Bankruptcy Code [Docket No. 103].

8. On May 18, 2026, the Debtors filed the Bidding Procedures Motion, which is scheduled to be heard by the Court on June 11, 2026 at 2:00 p.m. (ET) (the "Hearing"). Since filing the Bidding Procedures Motion, the Debtors have received informal comments thereto from the U.S. Trustee and several landlords (collectively, the "Landlords") and the Committee filed the *Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion to Establish Bid Procedures* [Docket No. 168] (the "Objection"). The Debtors have been working with the various parties to consensually resolve these comments and narrow the issues raised in the Objection, among other informal comments and objections received to the other matters

scheduled for the Hearing.[3] The parties' efforts have been successful; the Debtors believe that they have resolved the informal comments to the Bidding Procedures Motion received from the U.S. Trustee and the Landlords through revisions to the Bidding Procedures Order and the Bidding Procedures. However, the Debtors were unable to reach the terms of a consensual resolution with the Committee prior to the deadline for filing and serving objections to the Bidding Procedures Motion, which was extended for the Committee from June 1, 2026 at 4:00 p.m. (ET) to June 5, 2026 at 4:00 p.m. (ET) (the "Extended Objection Deadline"). On the Extended Objection Deadline, the Committee filed the Objection, which the Debtors have since been able to consensually resolve with the Committee. Given the parties' efforts to consensually resolve the Objection, the Debtors were unable to respond to the Objection prior to the deadline to file the Reply.

Basis for Relief

9. Pursuant to Local Rule 9006-1(d), "[r]eply papers . . . may be filed by 4:00 p.m. prevailing Eastern Time the day prior to the deadline for filing the agenda." Del. Bankr. L.R. 9006-1(d). The deadline to file the agenda for the Hearing was on or before 12:00 p.m. (ET) on June 9, 2026. Accordingly, the Debtors' deadline to file the Reply was on or before 4:00 p.m. (ET) on June 8, 2026 (the "Reply Deadline").

10. As noted above, since the filing of the Bidding Procedures Motion, the Debtors and the Committee have been working towards a consensual resolution of the issues raised in the Objection. Consequently, the Debtors extended the Objection Deadline to allow the parties

[3] On June 5, 2026, the Debtors filed a notice adjourning the Hearing with respect to the disclosure statement and cash collateral matters by one week. *See* Docket No. 169. On June 8, 2026, the Debtors filed ten revised proposed forms of order with the consent of the parties which provided comments thereto, as applicable, under certification of counsel. *See* Docket Nos. 175–183 & 187. The Debtors continue to work with parties to resolve informal comments received to the outstanding matters scheduled for the Hearing.

additional time to negotiate and to promote an efficient use of the Court's time and resources at the Hearing. However, given the proximity of the Extended Objection Deadline to the Hearing and the parties' negotiations, the Debtors were unable to prepare and file the Reply in advance of the Reply Deadline.

11. The Reply addresses the points raised in the Objection and the consensual resolution reached between the Debtors and the Committee. The Reply will provide the Court with a more complete and accurate record to assist the Court in its consideration of the Bidding Procedures Motion.

12. Accordingly, by this Motion for Leave, the Debtors respectfully request that the Court enter an order granting the Debtors leave and permission to file the Reply beyond the Reply Deadline.

[*Remainder of Page Intentionally Left Blank*]

WHEREFORE, the Debtors request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, (a) granting the relief requested herein and (b) granting such other relief as the Court deems appropriate under the circumstances.

Dated: June 10, 2026
Wilmington, Delaware

/s/ Shella Borovinskaya

YOUNG CONAWAY STARGATT & TAYLOR, LLP
Michael R. Nestor (Del. No. 3526)
Kara Hammond Coyle (Del. No. 4410)
Shella Borovinskaya (Del. No. 6758)
Kristin L. Cardoza (Del. No. 6871)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: mnestor@ycst.com
kcoyle@ycst.com
sborovinskaya@ycst.com
kcardoza@ycst.com

Proposed Co-Counsel for the Debtors and Debtors in Possession

KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
Joshua A. Sussberg, P.C.
Matthew C. Fagen, P.C. (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: matthew.fagen@kirkland.com

-and-

KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
Brian J. Nakhaimousa (admitted *pro hac vice*)
830 Brickell Plaza
Miami, Florida 33131
Telephone: (305) 432-5600
Email: brian.nakhaimousa@kirkland.com

Proposed Co-Counsel for the Debtors and Debtors in Possession

Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
WEST MARINE, INC., *et al.*,[1]	)	Case No. 26-10794 (KBO)
Debtors.	)	(Jointly Administered)
	)	**Re: Docket No. 49**

ORDER (I) GRANTING DEBTORS' LEAVE AND PERMISSION TO FILE REPLY IN SUPPORT OF THE DEBTORS' BIDDING PROCEDURES MOTION AND (II) GRANTING RELATED RELIEF

Upon the motion (the "Motion for Leave")[2] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for the entry of an order (this "Order"): (a) granting the Debtors leave and permission to file the Reply; and (b) granting related relief, all as more fully set forth in the Motion for Leave; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion for Leave in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in

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the Motion for Leave is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion for Leave is appropriate and no other notice need be provided; and this Court having determined that the legal and factual bases set forth in the Motion for Leave establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion for Leave is granted as set forth herein.

2. Pursuant to Local Rule 9006-1(d), the Debtors are granted leave and permission to file the Reply, and the Reply is deemed timely filed as a matter of record in these chapter 11 cases.

3. This Court shall retain jurisdiction over any and all matters arising from or related to the interpretation or implementation of this Order.