Docket #0375 Date Filed: 07/09/2026

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)

CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION ESTABLISHING DISCOVERY SCHEDULE FOR COMMITTEE INVESTIGATION AND PLAN CONFIRMATION

The undersigned proposed counsel for the above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby certify as follows:

1. On May 17, 2026, each of the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code with the United States Bankruptcy Court for the District of Delaware (the "Court").

2. On June 23, 2026, the Debtors filed the *Amended Joint Plan of Reorganization of West Marine, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 278] (the "Plan").

3. On June 23, 2026, the Court entered an order (the "Solicitation Order") [Dkt No. 284], conditionally approving the adequacy of the *Disclosure Statement for the Amended Joint Plan of Reorganization of West Marine, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 280], and whereas, among other things, the Solicitation Order

[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.

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scheduled the Plan confirmation hearing for 10:00 a.m. (ET) on August 11, 2026 (the "Plan Confirmation Hearing").

4. On June 26, 2026, the Official Committee of Unsecured Creditors (the "Committee") filed its *Motion Pursuant to Bankruptcy Rule 2004 for an Order Directing the Production of Documents and Information* [Dkt. No. 304] (the "2004 Motion").

5. The Debtors and the Committee, in consultation with L Catterton Management Limited and its affiliates, including LC9 Marine One Aggregator LP (collectively, "L Catterton"), and the Ad Hoc Group of Consenting Stakeholders (collectively with L Catterton, the Debtors, and the Committee, the "Parties"), have agreed to resolve the 2004 Motion by, in addition to the Debtors' document production to date, stipulating to the discovery schedule (the "Stipulation"),[2] attached as Exhibit 1 to the proposed form of order (the "Proposed Order") attached hereto as **Exhibit A**, applicable to the Plan Confirmation Hearing. The Parties consent to entry of the Proposed Order approving the Stipulation.

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[2] Capitalized terms used but not otherwise defined herein have the meaning given to such terms in the Stipulation.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order approving the Stipulation without further notice or hearing at the Court's earliest convenience.

Dated: July 9, 2026
Wilmington, Delaware

/s/ Shella Borovinskaya

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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)
	)	**Ref. Docket No. __**

ORDER APPROVING STIPULATION ESTABLISHING DISCOVERY SCHEDULE FOR COMMITTEE INVESTIGATION AND PLAN CONFIRMATION

Upon the *Certification of Counsel Regarding Order Approving Stipulation Establishing Discovery Schedule for Committee Investigation and Plan Investigation* and the *Stipulation Establishing Discovery Schedule for Committee Investigation and Plan Confirmation* (the "Stipulation"), attached hereto as **Exhibit 1**; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is hereby approved.

2. The Stipulation shall become effective immediately upon entry of this Order.

3. This Court shall retain jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order or the Stipulation.

[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.

Exhibit 1

Stipulation

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)

STIPULATION ESTABLISHING DISCOVERY SCHEDULE
FOR COMMITTEE INVESTIGATION AND PLAN CONFIRMATION

This stipulation (this "Stipulation") is entered into by and between (i) West Marine, Inc., *et al.*, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"); (ii) the Official Committee of Unsecured Creditors of the Debtors (the "Committee,"); (iii) L Catterton Management Limited and its affiliates, including LC9 Marine One Aggregator LP (collectively, "L Catterton"); and (iv) the Ad Hoc Group of Consenting Stakeholders (the "Ad Hoc Group," together with L Catterton, the "Plan Proponents," and together with the Debtors, and the Committee, the "Parties"). The Parties, by and through their undersigned counsel, hereby stipulate and agree as follows:

RECITALS

WHEREAS, on May 17, 2026, each of the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code with the United States Bankruptcy Court for the District of Delaware (the "Court").

[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.

WHEREAS, on June 23, 2026, the Debtors filed the *Amended Joint Plan of Reorganization of West Marine, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 278] (the "Plan").

WHEREAS, on June 23, 2026, the Court entered an order (the "Solicitation Order") [Dkt No. 284], conditionally approving the adequacy of the *Disclosure Statement for the Amended Joint Plan of Reorganization of West Marine, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 280], and whereas, among other things, the Solicitation Order scheduled the Plan confirmation hearing for 10:00 a.m. (ET) on August 11, 2026 (the "Plan Confirmation Hearing"), with objections due at 4:00 p.m. (ET) on August 3, 2026 (the "Plan Objection Deadline").

WHEREAS, on June 26, 2026, the Committee filed its *Motion Pursuant to Bankruptcy Rule 2004 for an Order Directing the Production of Documents and Information* [Dkt. No. 304] (the "2004 Motion").

WHEREAS, the Committee and the Debtors have agreed to resolve the 2004 Motion by, in addition to the Debtors' document production to date, stipulating to the below discovery schedule applicable to the Plan Confirmation Hearing.

The Parties now hereby stipulate and agree, as follows:

1. The above recitals are incorporated by reference into this Stipulation with the same force and effect as if fully set forth hereinafter.

2. The following schedule shall govern discovery relating to the Plan Confirmation Hearing:

Date	Event
July 10, 2026	Last day for the Committee to serve (i) any non-duplicative discovery demands on the Debtors; (ii) document demands and deposition notices on the Plan Proponents; and (iii) subpoenas seeking documents and/or deposition testimony on any other parties.
July 11, 2026	Deadline for the Parties to meet and confer in an effort to resolve any discovery disputes concerning the Committee's discovery requests.
July 13, 2026 at 9:30 a.m. ET	Court to conduct status conference to resolve any outstanding discovery issues.
July 14, 2026	Debtors and the Plan Proponents to begin rolling document productions.
July 17, 2026	Debtors and the Committee to identify all fact and expert witnesses that may testify at the Confirmation Hearing (subject to ability of parties to identify additional witnesses based on facts or information not uncovered by this deadline).
July 20, 2026	Debtors and the Plan Proponents to substantially complete document productions.
July 20, 2026	Fact depositions begin (no earlier than).
July 22, 2026	Debtors and the Committee to submit initial expert reports.
July 27, 2026	Deadline to exchange initial witness and exhibit lists.
July 29, 2026	Fact depositions to conclude (no later than) and expert depositions begin (no earlier than).
July 31, 2026	Deadline to file and serve objections to initial witness and exhibit lists.
August 3, 2026 at 10:00 a.m. ET	Court to conduct status conference/pretrial conference to resolve any outstanding discovery issues and/or to address procedures for the Plan Confirmation Hearing.
August 3, 2026 at 12:00 p.m. ET	Deadline to submit expert rebuttal reports.

August 3, 2026 at 11:59 p.m. ET	Plan Objection Deadline (extended beyond 4 p.m. (ET) for the Committee).
August 8, 2026 at 11:59 p.m. ET	Parties to file and exchange witness and exhibit lists and declarations to be submitted in lieu of live testimony. (Parties to meet and confer in advance concerning which witnesses will be subject to written directs.)
August 8, 2026	Expert depositions to conclude (no later than) and Debtors and the Committee to meet and confer regarding objections to initial witness and exhibit lists.
August 11, 2026 at 10:00 a.m. ET	Plan Confirmation Hearing.

3. The Parties acting together may amend or modify the terms of this Stipulation without further order by the Court upon filing of a written notice of such amendment or modification with the Court. The Court may amend or modify the terms of this Stipulation for good cause shown.

4. The Court shall retain jurisdiction over any and all matters arising from or related to the interpretation of this Stipulation.

STIPULATED AND AGREED TO BY:

Dated: July 9, 2026

/s/ Shella Borovinskaya

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