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)
	)	**Hearing Date:** **August 11, 2026 at 10:00 a.m. (ET)**
	)	**Objection Deadline:** **At the Hearing**

DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTORS TO EXCEED THE PAGE LIMIT REQUIREMENT FOR THE DEBTORS' CONFIRMATION BRIEF

The above-captioned debtors and debtors in possession (collectively, the "Debtors") state as follows in support of this motion (this "Motion"):[2]

Relief Requested

1. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Order") authorizing the Debtors to exceed the page limit requirement for the *Debtors' Memorandum of Law in Support of an Order (I) Approving the Debtors' Disclosure Statement on a Final Basis and (II) Confirming the Second Amended Joint Plan of Reorganization*

[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.

[2] A detailed description of the Debtors and their business, including the facts and circumstances giving rise to the Debtors' chapter 11 cases, is set forth in the *Declaration of Paulee Day, Chief Executive Officer of West Marine, Inc., in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [Docket No. 15] (the "First Day Declaration"), incorporated by reference herein. Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the First Day Declaration or the Plan (defined herein), as applicable.

of West Marine, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (the "Confirmation Brief"), filed contemporaneously herewith.

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 Rule 9013-1(f) (the "Local Rules"), to the entry of a final order by the Court in connection with this Motion 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 in this Motion are section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code") and Local Rule 3017-3.

Background

I. General 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 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, (the "Petition Date"), 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 Rule 1015(b) of the Federal Rules of Bankruptcy Procedure 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].

II. The Combined Hearing and the Confirmation Brief

8. On May 18, 2026, the Debtors filed the *Joint Plan of Reorganization of West Marine, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 46] (as may be further amended, modified, or supplemented from time to time, the "Plan") and the *Disclosure Statement for the Joint Plan of Reorganization of West Marine, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 47] (as may be further amended, modified, or supplemented from time to time, the "Disclosure Statement"). Following discussions and negotiations with the Debtors' various stakeholders, including the Committee, the Consenting Stakeholders, and the U.S. Trustee, on June 23, 2026, the Debtors filed the (a) *Amended Joint Plan of Reorganization of West Marine, Inc. and Its Debtor Affiliates*

Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 278][3] and (b) *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* [Docket No. 280], which resolved certain informal concerns raised by such parties. The Debtors solicited votes on the Plan in accordance with that certain *Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Voting Procedures with Respect to Confirmation of the Debtors' Amended Joint Chapter 11 Plan, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling A Combined Hearing and Setting Related Dates and Deadlines, and (V) Granting Related Relief* [Docket No. 284] (the "Conditional Disclosure Statement Order").

9. The Conditional Disclosure Statement Order established August 3, 2026 at 4:00 p.m. (prevailing Eastern Time) as the deadline to object to confirmation of the Plan and final approval of the Disclosure Statement (the "Objection Deadline"), as may have been extended for certain parties. As of the Objection Deadline, the Debtors did not receive any formal objections to confirmation of the Plan or final approval of the Disclosure Statement but did receive informal comments thereto from various parties in addition to twenty-five[4] formal objections related to proposed Cure amounts included in the Plan Supplement and several informal responses in connection therewith (collectively, the "Objections").

10. The Conditional Disclosure Statement Order also established August 6, 2026 as the deadline by which the Debtors must submit the Confirmation Brief.

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[3] Contemporaneously herewith, the Debtors filed the *Second Amended Joint Plan of Reorganization of West Marine, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 478].

[4] *See* Docket Nos. 343, 352, 356, 402, 409, 412, 414-417, 419, 422-425, 427-429, 462-464, 466, 467-468 & 470. The Debtors treated objections filed to cure amounts listed on the *Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases* [Docket No. 266 (Sealed) and 267 (Redacted)] as Cure/ Assumption Objections per agreement with the respective objecting parties.

11. The hearing for the Court to consider confirmation of the Plan (the "Combined Hearing") is scheduled for August 11, 2026 at 11:00 a.m. (prevailing Eastern Time).

Basis for Relief

12. Local Rule 3017-3 limits the length of a brief in support of approval of a disclosure statement or confirmation of a chapter 11 plan to 60 pages, exclusive of any tables of contents and citations, without leave of the Court. *See* Del. Bankr. L.R. 3017-3. A brief, however, may exceed 60 pages with leave of the Court. *See id.* Further, Local Rule 1001-1(d) provides that "[t]he Court may modify application of these Local Rules in any case or proceeding in the interest of justice." Del. Bankr. L.R. 1001(d). The Debtors respectfully submit that authority to exceed the page limitations prescribed by Local Rule 3017-3 in connection with the Confirmation Brief is reasonable and appropriate under the circumstances.

13. The Confirmation Brief, as currently drafted, exceeds the page limitations prescribed by Local Rule 3017-3. The Confirmation Brief explains, in detail, (i) why the Plan should be confirmed, including walking the Court through why each factor of section 1129 of the Bankruptcy Code is satisfied; and (ii) why the Disclosure Statement should be approved as containing adequate information within the meaning of section 1125 of the Bankruptcy Code.

14. The Debtors respectfully submit that allowing the Confirmation Brief to exceed the page limitations prescribed by Local Rule 3017-3 is appropriate and justified. The Confirmation Brief is less than 10 pages longer than the limitations permitted by the Local Rules. Because of the timeline requested by the Debtors and ultimately approved by the Court, the Combined Hearing is serving not only as a hearing to consider confirmation of the Plan, but also as a hearing on the adequacy of the Disclosure Statement and approval of the solicitation and the solicitation procedures. Accordingly, the Confirmation Brief presents the relevant factual background and

legal arguments needed to obtain Court approval on each of these hallmark milestones in these chapter 11 cases.

15. As further detailed in the Confirmation Brief, certain of the Objections concern Cure disputes, many of which have since been resolved through inclusion of agreed-upon language in the Confirmation Order or by agreement of the parties. The Debtors are actively working with various parties whose Cure amounts remain unresolved to address such Objections, and all parties' respective rights are reserved to address any unresolved matters at a future hearing, if necessary. The Debtors have worked, and continue to work, diligently and in good faith to attempt to resolve each of the Objections.

16. Given that the Confirmation Brief sets forth the reasons why the statutory requirements of the Bankruptcy Code are satisfied with respect to confirmation of the Plan and final approval of the Disclosure Statement, it necessarily follows that the Confirmation Brief exceeds the page limitations set forth in Local Rule 3017-3. In order to adequately present the Court with a complete picture of the matters that will be before it at the Combined Hearing, the Debtors respectfully request that this Court grant the relief sought by this Motion.

Notice

17. The Debtors will provide notice of this Motion to the following parties or their respective counsel: (a) the U.S. Trustee; (b) counsel to the Committee; (c) counsel to Eclipse, as ABL Agent and FILO agent; (d) counsel to Wilmington Savings Fund Society, FSB, as Term Loan Agent; (e) counsel to the Consenting Stakeholders; and (f) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested herein, the Debtors submit that no other or further notice is necessary.

WHEREFORE, the Debtors request entry of the 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: August 6, 2026
Wilmington, Delaware

/s/ Kristin L. Cardoza

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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)
	)	**Hearing Date:** **August 11, 2026 at 10:00 a.m. (ET)**
	)	**Objection Deadline:** **At the Hearing**

NOTICE OF MOTION

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (collectively, the "Debtors") have filed the attached *Debtors' Motion for Entry of an Order Authorizing the Debtors to Exceed the Page Limit Requirement for the Debtors' Confirmation Brief* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON **AUGUST 11, 2026, AT 10:00 A.M. (PREVAILING EASTERN TIME)**, BEFORE THE HONORABLE KAREN B. OWENS, CHIEF UNITED STATES BANKRUPTCY COURT JUDGE FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801. OBJECTIONS TO THE MOTION, IF ANY, ARE DUE AT THE HEARING.

PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

[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.

Dated: August 6, 2026
Wilmington, Delaware

/s/ Kristin L. Cardoza

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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)
	)	**Re: Docket No. _**

ORDER AUTHORIZING THE DEBTORS TO EXCEED THE PAGE LIMIT REQUIREMENT FOR THE DEBTORS' CONFIRMATION BRIEF

Upon the motion (the "Motion")[2] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") authorizing the Debtors to exceed the page limit requirement for the Confirmation Brief, all as more fully set forth in the Motion; 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 in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the

[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.

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

Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing 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. The Debtors are authorized to file the Confirmation Brief in excess of the page limitation prescribed in Local Rule 3017-3.

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