IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Saga Formations, Inc., et al., 1

Debtors.

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

Re D.I. 849

CERTIFICATE OF NO OBJECTION REGARDING TRUSTEE'S MOTION FOR AN ORDER AUTHORIZING THE FILING UNDER SEAL OF RETENTION APPLICATION

The undersigned hereby certifies that, as of the date hereof, Pashman Stein Walder Hayden, P.C. ("<u>Pashman</u>") has received no answer, objection or other responsive pleading to the *Trustee's Motion for an Order Authorizing the Filing Under Seal of Retention Application* (the "<u>Motion</u>") [D.I. 849] filed on July 18, 2025.

Pursuant to the Notice of Motion, responses to the Motion were to be filed and served no later than August 1, 2025, at 4:00 p.m. (ET). The undersigned further certifies that Pashman has caused a review of the Court's docket in these Chapter 11 Cases and that no answer, objection or other responsive pleading to the Motion appears thereon.

WHEREFORE, the Trustee respectfully requests that the Order attached to the Motion as

Exhibit A be entered at the earliest convenience of the Court.

The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758); and Tangible Play, Inc. (9331).



Dated: August 4, 2025 Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Alexis R. Gambale

Henry J. Jaffe (No. 2987)

Joseph C. Barsalona II (No. 6102)

Alexis R. Gambale (No. 7150)

824 N. Market Street, Suite 800

Wilmington, DE 19801

Telephone: (302) 592-6496

Email: hjaffe@pashmanstein.com

jbarsalona@pashmanstein.com agambale@pashmanstein.com

-and-

JENNER & BLOCK LLP

Catherine Steege (admitted *pro hac vice*)
Melissa Root (admitted *pro hac vice*)
William A. Williams (admitted *pro hac vice*)
353 N. Clark Street
Chicago, Illinois 60654
Telephone: (312) 923-2952

Telephone: (312) 923-2952 Email: csteege@jenner.com mroot@jenner.com wwilliams@jenner.com

Co-counsel to the Trustee