

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

F21 OPCO, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10469 (MFW)

(Jointly Administered)

Ref: Docket Nos. 9 & 76

CERTIFICATE OF NO OBJECTION REGARDING DOCKET NO. 9

On March 16, 2025, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed the *Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Certain Prepetition Shipping, Warehouse, and Delivery Charges, and (II) Granting Related Relief* [D.I. 9] (the “**Motion**”). A proposed form of order approving the Motion on a final basis was attached to the Motion as Exhibit B (the “**Proposed Final Order**”).

On March 18, 2025, the United States Bankruptcy Court for the District of Delaware (the “**Court**”) entered an order approving the Motion on an interim basis [D.I. 76] (the “**Interim Order**”). Pursuant to the Interim Order, any objections or responses to entry of the Proposed Final Order were to be filed and served by April 8, 2025 at 4:00 p.m. (ET) (the “**Objection Deadline**”), as may have been extended for certain parties.

The undersigned further certifies that, as of the date hereof, he has reviewed the Court’s docket in these cases and no answer, objection, or other responsive pleading to the Motion appears

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: F21 OpCo, LLC (8773); F21 Puerto Rico, LLC (5906); and F21 GiftCo Management, LLC (6412). The Debtors’ address for purposes of service in these Chapter 11 Cases is 110 East 9th Street, Suite A500, Los Angeles, CA 90079.



thereon. As no responses to the Motion have been received, it is hereby respectfully requested that the Proposed Final Order be entered at the earliest convenience of the Court.

Dated: April 10, 2025

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Andrew M. Lee

Andrew L. Magaziner (No. 5426)

Robert F. Poppiti, Jr. (No. 5052)

Ashley E. Jacobs (No. 5635)

S. Alexander Faris (No. 6278)

Kristin L. McElroy (No. 6871)

Andrew M. Lee (No. 7078)

Sarah Gawrysiak (No. 7403)

Rodney Square

1000 North King Street

Wilmington, DE 19801

Telephone: (302) 571-6600

Email: amagaziner@ycst.com

rpoppiti@ycst.com

ajacobs@ycst.com

afaris@ycst.com

kmcelroy@ycst.com

alee@ycst.com

sgawrysiak@ycst.com

Proposed Counsel to the Debtors and Debtors in Possession