Case 25-10469-MFW Doc 180 Filed 04/10/25 Page 1 of 2 Docket #0180 Date Filed: 04/10/2025

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

F21 OPCO, LLC, et al.,

Debtors.

Chapter 11

Case No. 25-10469 (MFW)

(Jointly Administered)

Ref: Docket Nos. 12 & 78

CERTIFICATE OF NO OBJECTION REGARDING DOCKET NO. 12

The undersigned hereby certifies that, as of the date hereof, she has received no answer, objection or other responsive pleading to the *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay and Honor Certain (A) Prepetition Wages, Benefits, and Other Compensation Obligations; (B) Prepetition Employee Business Expenses; (C) Bonus Program Obligations; and (D) Workers' Compensation Obligations; (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Obligations; and (III) Granting Related Relief [D.I. 12] (the "Motion") filed with the United States Bankruptcy Court for the District of Delaware (the "Court") on March 17, 2025. 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 Court entered an order approving the Motion on an interim basis [D.I. 78] (the "<u>Interim Order</u>"). 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).²

The objection deadline was extended to April 10, 2025 at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors.



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.

The undersigned further certifies that, as of the date hereof, she has reviewed the Court's docket in these cases and no answer, objection, or other responsive pleading to the Motion appears 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/ Kristin L. McElroy

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

Wilmington, DE 19801
Telephone: (302) 571-6600
Email: amagaziner@ycst.com
rpoppiti@ycst.com
ajacobs@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