

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: § Chapter 11
§
NEIGHBORS LEGACY HOLDINGS, § Case No. 18-33836-11 (MI)
INC., *et al.*,¹ §
§
Debtors. §

**CERTIFICATE OF NO OBJECTION TO UNSECURED CREDITOR TRUSTEE'S
MOTION FOR ENTRY OF AN ORDER (I) TERMINATING THE UNSECURED
CREDITOR TRUST, (II) AUTHORIZING POST-TERMINATION WIND-DOWN
ACTIVITIES, (III) DISCHARGING THE TRUSTEE AND OVERSIGHT
COMMITTEE, (IV) AUTHORIZING DESTRUCTION OF THE TRUST
BOOKS AND RECORDS, AND (V) GRANTING RELATED RELIEF**

(Related Docket No. 1298)

The undersigned hereby certifies as follows:

1. On November 4, 2025, the *Unsecured Creditor Trustee's Motion for Entry of an Order (I) Terminating the Unsecured Creditor Trust, (II) Authorizing Post-Termination Wind-Down Activities, (III) Discharging the Trustee and Oversight Committee (IV) Authorizing Destruction of the Trust Books and Records, and (V) Granting Related Relief* [Docket No. 1298] (the "Motion") was filed with the Court.

2. Responses, if any, to the Motion were required to have been filed with the Court on or before November 25, 2025 (the "Response Deadline").

3. The Response Deadline has passed and no responsive pleading to the Motion has appeared on the Court's docket in the above-captioned chapter 11 cases or was served upon the

¹ Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at www.veritaglobal.net/neighbors. The location of Debtors' principal place of business and the Debtors' service address was: 10800 Richmond Avenue, Houston, Texas 77042.



undersigned counsel. Accordingly, the undersigned respectfully requests that the form of Order granting the Motion attached hereto be entered at the earliest convenience of the Court.

Dated: November 26, 2025

By: /s/ Ayala A. Hassell
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***Counsel for Mark Shapiro, Unsecured Creditor
Trustee***

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of November, 2025, a true and correct copy of the above and foregoing was caused to be served through this Court's CM/ECF noticing system to all parties registered to receive notices in these cases.

/s/ Ayala A. Hassell
Ayala A. Hassell, Esq.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: NEIGHBORS LEGACY HOLDINGS, INC., <i>et al.</i>,¹ Debtors.	§ § § § § §	Chapter 11 Case No. 18-33836-11 (MI)
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**ORDER GRANTING UNSECURED CREDITOR TRUSTEE’S MOTION
FOR ENTRY OF AN ORDER (I) TERMINATING THE UNSECURED
CREDITOR TRUST, (II) AUTHORIZING POST-TERMINATION
WIND-DOWN ACTIVITIES, (III) DISCHARGING THE TRUSTEE AND
OVERSIGHT COMMITTEE, (IV) AUTHORIZING DESTRUCTION OF
THE TRUST BOOKS AND RECORDS, AND (V) GRANTING RELATED RELIEF**

(Related Docket No. 1298)

Upon the Motion (the “Motion”) by the Unsecured Creditor Trustee (the “Unsecured Creditor Trustee”) of the Unsecured Creditor Trust (the “Trust”), established pursuant to the confirmed Plan² of the above-captioned debtors (collectively, the “Debtors”), seeking entry of an order (this “Order”) in accordance with the Plan, Confirmation Order, and Trust Agreement, (i) terminating the Trust, (ii) authorizing the Trustee’s post-termination Wind-Down activities, (iii) discharging the Trustee and Oversight Committee from duties, obligations, and liability under the Plan, Confirmation Order, Trust Agreement, and Distribution Order (iv) authorizing destruction of the Trust’s books and records three years after termination of the Trust, and (v) granting related relief; and upon the Certification of the Trustee; and this Court having jurisdiction over this matter

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² Unless otherwise noted, the capitalized terms herein shall have the definitions ascribed to them in the Motion or the Plan Documents.

pursuant to 28 U.S.C. § 1334; 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 Unsecured Creditor Trustee's notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and it appearing that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, **IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. The Trust is hereby terminated and the Trustee is hereby discharged from all duties under the Plan, Confirmation Order, Trust Agreement, and Distribution Order without further order of this Court.
3. The members of the Oversight Committee are hereby deemed to have resigned their positions and the Trustee, the Oversight Committee, and their respective directors, affiliates, employees, employers, agents, professionals, and representatives are hereby discharged and released from any and all duties, obligations, and liabilities under or related to the Plan, Confirmation Order, Trust Agreement, and Distribution Order except as may be expressly provided for herein.
4. The Trustee and the Trust's professionals are hereby authorized to take such actions after the termination of the Trust as may be necessary or appropriate to effectuate the final wind-down of the Trust and perform the Wind-Down Activities as described in the Motion; and, in accordance with the Plan, Trust Agreement, and Distribution Order, the Trustee is authorized to

reserve sufficient funds, estimated to be approximately \$38,000, to pay for such actions and Wind-Down Activities.

5. Upon three (3) years after the termination of the Trust, the Trustee is hereby authorized, but not required, to destroy or otherwise dispose of the books, records, lists of the Beneficiaries, the registry of claims and Beneficiaries, and other Trust documents and files that have been delivered to, created by, maintained by, or in the possession of, the Trustee.

6. The Trustee, the Debtors, the claims agent, and the Clerk of the Court are authorized to take all actions necessary or appropriate to effectuate the relief granted pursuant to this Order in accordance with the Motion.

7. The terms and conditions of this Order will be immediately effective and enforceable upon its entry.

8. This Court retains exclusive jurisdiction and power to enforce this Order or resolve any dispute arising from or related to this Order.

Dated: _____, 2025

MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE