

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: : X  
: Chapter 11  
:   
SEQUENTIAL BRANDS GROUP, INC., *et* : Case No. 21-11194 (JTD)  
*al.*,<sup>1</sup> :   
: (Jointly Administered)  
Debtors. :   
: Ref. Docket No. 725  
: X

**CERTIFICATION OF NO OBJECTION REGARDING LIQUIDATING  
TRUSTEE'S MOTION FOR FURTHER ENLARGEMENT OF THE  
PERIOD TO REMOVE ACTIONS**

The undersigned hereby certifies that:

1. On December 31, 2024, Drivetrain LLC, in its capacity as trustee of the liquidating trust (the "Liquidating Trustee") for the above-captioned debtors and debtors in possession (collectively, the "Debtors"), filed the *Liquidating Trustee's Motion to Further Enlarge the Period Within Which It May Remove Actions* [Docket No. 725] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").
2. Pursuant to the notice of Motion, responses were due to be filed on, or prior to, January 14, 2025, at 4:00 p.m. (ET) (the "Objection Deadline").

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Sequential Brands Group, Inc. (2789), SQBG, Inc. (9546), Sequential Licensing, Inc. (7108), William Rast Licensing, LLC (4304), Heeling Sports Limited (0479), Brand Matter, LLC (1258), SBG FM, LLC (8013), Galaxy Brands LLC (9583), The Basketball Marketing Company, Inc. (7003), American Sporting Goods Corporation (1696), LNT Brands LLC (3923), Joe's Holdings LLC (3085), Gaiam Brand Holdco, LLC (1581), Gaiam Americas, Inc. (8894), SBG-Gaiam Holdings, LLC (8923), SBG Universe Brands, LLC (4322), and GBT Promotions LLC (7003). The mailing address for each Debtor is 105 E. 34th Street, #249, New York, NY 10016. On September 26, 2022, the Court entered an order [Docket No. 646] closing the chapter 11 cases of the Debtors other than Case No. 21-11194 (JTD), *Sequential Brands Group, Inc.*



3. The undersigned certifies that the Bankruptcy Court's docket has been reviewed in this case and no answer, objection or other responsive pleading to the Motion appears thereon.

4. Accordingly, the Liquidating Trustee respectfully request entry of the Proposed Order attached hereto as **Exhibit 1** at the Bankruptcy Court's convenience.

Dated: January 17, 2025

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Timothy P. Cairns

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*Counsel to the Liquidating Trustee*

# **EXHIBIT 1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

SEQUENTIAL BRANDS GROUP, INC.,<sup>1</sup>

Debtor.

)  
 ) Chapter 11  
 )  
 ) Case No. 21-11194 (JTD)  
 )  
 ) (Jointly Administered)  
 ) **Ref. Docket No. 725**

## ORDER FURTHER ENLARGING THE PERIOD WITHIN WHICH THE LIQUIDATING TRUSTEE MAY REMOVE ACTIONS

Upon consideration of the *Liquidating Trustee’s Motion for Further Enlargement of the Period to Remove Actions* (the “Motion”)<sup>2</sup> of Drivetrain LLC, in its capacity as trustee of the liquidating trust (the “Liquidating Trustee”) for the above-captioned debtors and debtors in possession, and it appearing that good cause exists to grant the relief requested by the Motion;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. The period within which the Liquidating Trustee may seek removal of the Actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 is enlarged through and including **June 30, 2025**, without prejudice to the rights of the Liquidating Trustee to request further extensions.

1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Sequential Brands Group, Inc. (2789), SQBG, Inc. (9546), Sequential Licensing, Inc. (7108), William Rast Licensing, LLC (4304), Heeling Sports Limited (0479), Brand Matter, LLC (1258), SBG FM, LLC (8013), Galaxy Brands LLC (9583), The Basketball Marketing Company, Inc. (7003), American Sporting Goods Corporation (1696), LNT Brands LLC (3923), Joe's Holdings LLC (3085), Gaia Brand Holdco, LLC (1581), Gaia Americas, Inc. (8894), SBG-Gaia Holdings, LLC (8923), SBG Universe Brands, LLC (4322), and GBT Promotions LLC (7003). The mailing address for each Debtor is 105 E. 34th Street, #249, New York, NY 10016. On September 26, 2022, the Court entered an order [Docket No. 646] closing the chapter 11 cases of the Debtors other than Case No. 21-11194 (JTD), *Sequential Brands Group, Inc.*

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

4. The Liquidating Trustee is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.