

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re

Sticky's Holdings LLC, *et al.*,

Reorganized Debtors.<sup>1</sup>

Chapter 11

Case No. 24-10856 (JKS)

Jointly Administered

RE: D.I. 595

Hearing: June 6, 2025 at 10:30 a.m. (ET)

Obj: May 29, 2025 at 4:00 p.m. (ET)

**NOTICE OF HEARING ON: (X) (A) REORGANIZED DEBTORS' MOTION FOR ENTRY OF AN ORDER, (I) AUTHORIZING THE REORGANIZED DEBTORS TO MODIFY, AND APPROVING MODIFICATIONS TO, THE CONFIRMED PLAN OF REORGANIZATION, (II) CONFIRMING THE SUBCHAPTER V REORGANIZED DEBTORS' SECOND MODIFIED FIRST AMENDED PLAN OF REORGANIZATION, AND (III) GRANTING RELATED RELIEF; AND (B) CONFIRMATION HEARING ON THE SUBCHAPTER V DEBTORS' SECOND MODIFIED FIRST AMENDED PLAN OF REORGANIZATION; AND (Y) NOTICE OF: (I) OBJECTION DEADLINES WITH RESPECT TO THE PLAN MODIFICATION MOTION AND THE CONFIRMATION OF THE MODIFIED PLAN AND (II) OTHER DEADLINES RELATED TO CONFIRMATION OF THE MODIFIED PLAN<sup>2</sup>**

PLEASE TAKE NOTICE that, on May 8, 2025, the Reorganized Debtors filed the *Subchapter V Debtors' Second Modified First Amended Plan of Reorganization* [D.I.595, Exhibit A] (as may be modified, amended, or supplemented from time to time, the "Modified Plan").

PLEASE TAKE FURTHER NOTICE that, on May 8, 2025, the Reorganized Debtors also filed the *Reorganized Debtors' Motion for Entry of an Order (I) Authorizing the Reorganized Debtors to Modify, and Approving Modifications to, the Confirmed Plan of Reorganization, (II) Confirming the Subchapter V Reorganized Debtors' Second Modified First Amended Plan of Reorganization, and (III) Granting Related Relief* [D.I. 595] (the "Plan Modification Motion").

<sup>1</sup> The Reorganized Debtors in these cases, along with the last four digits of each Reorganized Debtor's federal tax identification number are as follows: Sticky's Holdings LLC (3586); Sticky Fingers LLC (3212); Sticky Fingers II LLC (7125); Sticky Fingers III LLC (3914); Sticky Fingers IV LLC (9412); Sticky Fingers V LLC (1465); Sticky Fingers VI LLC (0578); Sticky's BK I LLC (0423); Sticky's NJ I LLC (5162); Sticky Fingers VII LLC (1491); Sticky's NJ II LLC (6642); Sticky Fingers IX LLC (5036); Sticky's NJ III LLC (7036); Sticky Fingers VIII LLC (0080); Sticky NJ IV LLC (6341); Sticky's WC I LLC (0427); Sticky's Franchise LLC (5232); Sticky's PA GK I LLC (7496); Stickys Corporate LLC (5719); and Sticky's IP LLC (4569). The Reorganized Debtors' mailing address is 21 Maiden Lane, New York, NY 10038.

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



**PLEASE TAKE NOTICE** that a hearing is scheduled for June 6, 2025 at 10:30 a.m. (ET) before the Honorable J. Kate Stickles, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th floor, Courtroom 6, Wilmington, Delaware 19801 (the “Bankruptcy Court”) with respect to: (i) approval of the Plan Modification Motion; and (ii) Confirmation of the Modified Plan.

**PLEASE TAKE FURTHER NOTICE** that any objection to the Plan Modification Motion and the confirmation of the Modified Plan must be filed with the Bankruptcy Court and served (so that it is received on) or before 4:00 p.m. Eastern Time, in each case, on or before **May 29, 2025**.

**PLEASE TAKE FURTHER NOTICE** that the Modified Plan modifies the *Subchapter V Debtors’ Modified First Amended Plan of Reorganization* [D.I. 368] (the “Confirmed Plan”), which was confirmed pursuant to the *Findings of Fact, Conclusions of Law, and Order Confirming Subchapter V Debtors’ Modified First Amended Plan of Reorganization* [Docket No. 398] and which Confirmed Plan became effective November 29, 2024 [D.I. 431]. The modifications to the Confirmed Plan made by the Modified Plan are reflected in the blacklined version of the Modified Plan that is filed on the docket of the Bankruptcy Court as **Exhibits A (clean version) and B (blacklined version)** to the Plan Modification Motion [D.I.595]. The Reorganized Debtors were required to modify the Confirmed Plan due to the adverse financial circumstances presented since the Confirmed Plan Effective Date that prevent the Confirmed Plan being implemented, including making distributions thereunder, and by confirmation of the Modified Plan the Reorganized Debtors seek to prevent the conversion of the Cases to Chapter 7 cases pursuant to the filed *Motion of Reorganized Debtors to Convert the Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* [D.I. 481].

**PLEASE TAKE FURTHER NOTICE** that the Modified Plan seeks to change the treatment of Holders of Claims from the treatment that is provided for under the Confirmed Plan to the treatment provided under the Modified Plan. The Plan Modification Motion provides a further summary description of the Modified Plan and such summary herein and therein is subject to the Modified Plan in all respects, which you should review in detail.

**PLEASE TAKE FURTHER NOTICE** that the Pro Rata distributions proposed to be made under the Modified Plan will not result in payment in full of Allowed Administrative Expense Claims or Allowed General Unsecured Claims.

**PLEASE TAKE FURTHER NOTICE** that if you object to the treatment of your Claim as proposed in the Modified Plan, or to any of the provisions of the Modified Plan, you must file a timely objection to the Plan Modification Motion and to Confirmation of the Modified Plan. If you fail to file a timely objection the Reorganized Debtors will seek an order deeming you to have consented to the Modified Plan.

**PLEASE BE ADVISED THAT AS WITH THE CONFIRMED PLAN, THE MODIFIED PLAN CONTAINS CERTAIN RELEASE, INJUNCTION, AND EXCULPATION PROVISIONS; THESE ARE CONTAINED IN SECTIONS 7.9, 7.10, 7.11,**

**AND 7.12 OF THE MODIFIED PLAN, WHICH ARE EXCERPTED IN EXHIBIT A ANNEXED HERETO.**

**PLEASE TAKE FURTHER NOTICE** that the Modified Plan, if confirmed, sets various deadlines for certain creditors to assert claims as described below, unless an order of the Bankruptcy Court sets an earlier deadline:

<b>Claim</b>	<b>Deadline (unless an earlier date is set by order of the Bankruptcy Court) To File A Proof of Claim</b>
Administrative Expense Claims Accruing Since the Confirmed Plan Effective Date (excluding Rejection Claims and Administrative Expense Claims of Professionals, which are set forth below)	30 days after the Modified Plan Effective Date
Rejection Claims	Rejection Claims Bar Date
Administrative Expense Claims of Professionals Accruing Since the Confirmed Plan Effective Date	To be submitted to Reorganized Debtors for approval without the need to file any further fee applications with the Court.
Other Secured Creditors <sup>3</sup>	30 days after the Modified Plan Effective Date

**PLEASE TAKE FURTHER NOTICE** that the Reorganized Debtors reserve the right to adjourn the Confirmation Hearing and the deadlines related to Confirmation of the Modified Plan.

**PLEASE TAKE FURTHER NOTICE** that copies of the Modified Plan may be obtained by contacting Kurtzman Carson Consultants, LLC dba Verita Global, the claims and noticing agent (the “Claims and Noticing Agent”) retained by the Reorganized Debtors in this chapter 11 case by: (a) calling the Claims and Noticing Agent at (866) 967-1783 (Toll Free) or +1 (310) 751-2683 (International); (b) emailing [Stickysinfo@veritaglobal.com](mailto:Stickysinfo@veritaglobal.com) with a reference to “In re: Sticky’s Holdings LLC – Modified Plan Inquiry” in the subject line; or (c) writing to the Claims and Noticing Agent at Sticky’s Inquiries, c/o Kurtzman Carson Consultants LLC, 222 N. Pacific Coast Hwy., Ste. 300, El Segundo, CA 90245. You may also obtain copies of any pleadings filed with the Court for free by visiting the Reorganized Debtors’ restructuring website, <https://www.veritaglobal.net/stickysholdings>, or for a fee via PACER at: <http://pacer.psc.uscourts.gov>. Please be advised that the Reorganized Debtors’ counsel Pashman Stein Walder Hayden, P.C. or the Claims and Noticing Agent cannot provide you with legal advice, and you should consult with an attorney to provide any legal advice you may need.

<sup>3</sup> Unless an order of the Bankruptcy Court sets an earlier deadline, an Other Secured Creditor must take possession of its collateral on or before 10 days after the Modified Plan Effective Date.

Dated: May 8, 2025  
Wilmington, Delaware

**PASHMAN STEIN WALDER  
HAYDEN, P.C.**

/s/John W. Weiss

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Debtors in Possession*

**Exhibit A**

**Sections 7.9, 7.10, 7.11, and 7.12 of the Modified Plan**

**Section 7.9 of the Modified Plan****7.9 Releases by the Debtors**

Pursuant to section 1123(b) of the Bankruptcy Code, for good and valuable consideration, including the service of the Released Parties to facilitate the expeditious liquidation of the Debtors and the consummation of the transactions contemplated by the Modified Plan, on the Modified Plan Effective Date, the Released Parties are deemed forever released by the Debtors and their Estates, and each of their successors and assigns, from any and all claims, obligations, rights, suits, damages, Causes of Action, remedies and liabilities whatsoever, including any derivative claims asserted or assertable on behalf of the Debtors or the Estates, whether known or unknown, foreseen or unforeseen, existing or hereinafter arising, in law, equity or otherwise, that the Debtors or their Estates would have been legally entitled to assert in its own right (whether individually or collectively) based on or relating to, or in any manner arising from, in whole or in part, the Chapter 11 Cases, the business or contractual arrangements between the Debtors and any of the Released Parties, the negotiation, formulation or preparation of the Confirmed Plan, the Modified Plan, any Plan Supplement or related agreements, instruments or other documents (collectively, the “Debtors Released Claims”), other than Debtors Released Claims against a Released Party arising out of the gross negligence, willful misconduct, intentional fraud, or criminal liability of any such person or entity.

**Section 7.10 of the Modified Plan****7.10 Releases by Holders of Claims and Equity Interests**

On the Modified Plan Effective Date, except as otherwise provided herein and except for the right to enforce the Modified Plan, all persons (i) who voted to accept the Confirmed Plan or who are presumed to have voted to accept the Confirmed Plan but did not affirmatively mark the box on the Ballot to opt out of granting the releases provided under the Confirmed Plan and (ii) who voted to reject the Confirmed Plan but did not affirmatively mark the box on the Ballot to opt out of granting the releases provided under the Confirmed Plan, under section 1126(f) of the Bankruptcy Code shall, to the fullest extent permitted by applicable law, be deemed to forever release, and waive the Released Parties of and from all liens, claims, causes of action, liabilities, encumbrances, security interests, interests or charges of any nature or description whatsoever based or relating to, or in any manner arising from, in whole or in part, the Chapter 11 Cases or affecting property of the Estate, whether known or unknown, suspected or unsuspected, scheduled or unscheduled, contingent or not contingent, unliquidated or fixed, admitted or disputed, matured or unmatured, senior or subordinated, whether assertable directly or derivatively by, through, or related to any of the Released Parties and their successors and assigns whether at law, in equity or otherwise, based upon any condition, event, act, omission occurrence, transaction or other activity, inactivity, instrument or other agreement of any kind or nature occurring, arising or existing prior to the Effective Date in any way relating to or arising out of, in whole or in part, the Debtors, the Debtors’ prepetition operations, governance, financing, or fundraising, the purchase or sale of the Debtors’ securities, the Chapter 11 Cases, the pursuit of Confirmation

of the Confirmed Plan, the consummation of the Confirmed Plan or the administration of the Confirmed Plan, including without limitation, the negotiation and solicitation of the Confirmed Plan, all regardless of whether (a) a Proof of Claim or Equity Interest has been filed or is deemed to have been filed, (b) such Claim or Equity Interest is allowed, or (c) the Holder of such Claim or Equity Interest has voted to accept or reject the Confirmed Plan, except for willful misconduct, gross negligence, fraud or criminal misconduct, including the Debtors. Nothing contained herein shall impact the right of any Holder of an Allowed Claim or interest to receive a Distribution on account of its Allowed Claim or Allowed Interest in accordance with the Modified Plan.

#### **Section 7.11 of the Modified Plan**

##### **7.11 Exculpation**

None of the Debtors, their Professionals, Greer, the Debtors' officers and directors that served any time on or after the Petition Date, the Subchapter V Trustee, or the Purchaser, in its capacity as purchaser of the Purchased Assets (collectively, the "Exculpated Parties") shall have or incur any liability to any Holder of a Claim or Equity Interest, or other party in interest, with respect to any Exculpated Claim, including, without limitation, any act or omission in connection with, related to, or arising out of, in whole or in part, the Debtors' Chapter 11 Cases from the Petition Date to the Modified Plan Effective Date, except for willful misconduct, gross negligence, fraud or criminal misconduct as determined by a Final Order of a court of competent jurisdiction, and, in all respects, the Exculpated Parties shall be entitled to rely upon the advice of counsel with respect to their duties and responsibilities under the Modified Plan.

#### **Section 7.12 of the Modified Plan**

##### **7.12 Injunction Related to Third Parties**

From and after the Modified Plan Effective Date, all persons who have held, hold or may hold Claims against or Equity Interests in the Debtors are permanently enjoined from commencing or continuing in any manner, any Cause of Action released, to be released or discharged pursuant to the Modified Plan, or the Modified Plan Confirmation Order, from and after the Modified Plan Effective Date, to the extent of the releases, exculpation and discharge granted in the Modified Plan, all Holders of Claims or Equity Interests shall be permanently enjoined from commencing or continuing in any manner against the Released Parties and the Exculpated Parties and their assets and properties, as the case may be, any suit, action or other proceeding, on account of or respecting any claim, demand, liability, obligation, debt, right, cause of action, interest or remedy released or to be released pursuant to the Modified Plan, except as otherwise expressly provided in the Modified Plan, the Plan Supplement or related documents, or for obligations issued pursuant to the Modified Plan, all persons who have held, hold or may hold Claims or Equity Interests that have been released, discharged, or are subject to exculpation, are permanently enjoined, from and after the Modified Effective Date, from taking any of the following actions: (a) commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such Claims or Equity Interests; (b) enforcing,

**attaching, collecting or recovering by any manner or means any judgment, award, decree or order against such persons on account of or in connection with or with respect to any such Claims or Equity Interests; (c) creating, perfecting or enforcing any encumbrance of any kind against such persons or the property or estates of such persons on account of or in connection with or with respect to any such Claims or Equity Interests; and (d) commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such**