IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
SALT HOUSE, INC.,[1]	Case No. 25-12277 (LSS)
Debtor.	**Hearing Date: May 19, 2026 at 11:00 a.m. (ET)** **Response Deadline: May 8, 2026 at 4:00 p.m. (ET)**

DEBTOR'S FIRST (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CLAIMS

PARTIES RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND THEIR DISPUTED CLAIMS IDENTIFIED ON SCHEDULE 1 TO THE PROPOSED ORDER

The above-captioned debtor and debtor-in-possession (the "**Debtor**") hereby submits this objection (this "**Objection**") and seeks entry of an order, substantially in the form attached hereto as **Exhibit A** (the "**Proposed Order**"), disallowing and expunging the claims listed on Schedule 1 to the Proposed Order that were subsequently amended (collectively, the "**Amended Claims**"). In support of this Objection, the Debtor relies on the *Declaration of Heidi Robinson in Support of the Debtor's First (Non-Substantive) Omnibus Objection to Claims* (the "**Robinson Declaration**") attached hereto as **Exhibit B**, and respectfully states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "**Court**") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012 (the "**Amended Standing Order**"). This is a core proceeding pursuant to

[1] The Debtor in this chapter 11 case is Salt House, Inc. (f/k/a Food52, Inc.) and the last four digits of the Debtor's federal tax identification number are 2738. For the purpose of this chapter 11 case, the Debtor's service address is 1 Dock 72 Way, 13th Floor, Brooklyn, New York 11205.

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28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409. Pursuant to 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Rules**"), the Debtor consents to the entry of a final judgment or order with respect to this Objection if it is determined that the Court would lack Article III jurisdiction to enter such final judgment or order absent consent of the parties.

2. The statutory and legal predicates for the relief requested herein are sections 502 and 503 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "**Bankruptcy Code**"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and Local Rule 3007-1.

BACKGROUND

3. On December 29, 2025 (the "**Petition Date**"), the Debtor commenced a voluntary case under chapter 11 of the Bankruptcy Code. The Debtor is authorized to operate its businesses and manage its properties as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On January 8, 2026, the Office of the United States Trustee for the District of Delaware (the "**U.S. Trustee**") appointed an official committee of unsecured creditors (the "**Committee**"). No request has been made for the appointment of a trustee or an examiner in this chapter 11 case.

4. Additional information regarding the Debtor's businesses, its capital structure, and the circumstances leading to the filing of this chapter 11 case is set forth in the *Declaration of*

Erika Badan in Support of Chapter 11 Petition and First Day Motions (the "**First Day Declaration**") [Docket No. 2].[2]

5. On March 6, 2026, the Debtor filed the *Chapter 11 Plan of Liquidation for Salt House, Inc.* [Docket No. 258], as revised on March 25, 2026 [Docket No. 290] (the "**Plan**"), and accompanying *Disclosure Statement for the Chapter 11 Plan for Salt House, Inc.* [Docket No. 259], as revised on March 25, 2026 [Docket No. 291] (the "**Disclosure Statement**").[3] On March 27, 2026, the Court entered an order [Docket No. 301] conditionally approving the Disclosure Statement for solicitation purposes only and scheduled a hearing on confirmation of the Plan to be held on May 19, 2026.

RELIEF REQUESTED

6. By this Objection, the Debtor respectfully requests entry of the Proposed Order disallowing and expunging the Amended Claims. Any failure to disallow and expunge such claims will result in the applicable claimants potentially receiving an unwarranted recovery against the Debtor's estate, to the detriment of creditors in this chapter 11 case.

THE BAR DATES

7. On January 26, 2026, the Debtor filed its schedules of assets and liabilities and statements of financial affairs [Docket No. 141 & 142] (collectively, the "**Schedules**"). On February 24, 2026, the Debtor filed an amendment to Schedule E/F and Schedule G of the Schedules [Docket No. 232].

8. On February 9, 2026, the Court entered that certain *Order (I) Establishing Bar Dates and Related Procedures for Filing Proofs of Claim (Including for Claims Arising Under*

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[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration or Bar Date Order (defined herein), as applicable.

[3] The Debtor filed a solicitation version of the Disclosure Statement on March 27, 2026 [Docket No. 302].

Section 503(b)(9) of the Bankruptcy Code), (II) Approving the Form and Manner of Notice Thereof, and (III) Granting Related Relief [Docket No. 199] (the "**Bar Date Order**"), which, among other things, established (a) March 13, 2026 at 5:00 p.m. (prevailing Eastern Time), as the deadline to file proofs of claim for persons or entities, not including Governmental Units as defined in 101(27) of the Bankruptcy Code (the "**General Bar Date**"), and (b) June 29, 2026 at 5:00 p.m. (prevailing Eastern Time) as the deadline to file proofs of claim for Governmental Units (the "**Governmental Bar Date**").

9. The Bar Date Order also provides that if the Debtor amends or supplements the Schedules to reduce the undisputed, noncontingent, and liquidated amount of a claim listed in the Schedules, to change the nature or classification of a claim against the Debtor reflected in the Schedules, or to add a new claim to the Schedules, the affected creditor is required to file a proof of claim or amend any previously filed proof of claim in respect of the amended scheduled claim by the later of (a) the General Bar Date or the Governmental Bar Date, as applicable, and (b) 5:00 p.m. (prevailing Eastern Time) on the date that is twenty-one (21) days from the date on which the Debtor mails notice of the amendment to the Schedules (or another time period as may be fixed by the Court (the "**Amended Schedules Bar Date**").

10. Additionally, the Bar Date Order provides that any person or entity that holds a claim that arises from the rejection of an executory contract or unexpired lease is required to file a proof of claim by the later of (a) the General Bar Date or the Governmental Bar Date, as applicable, and (b) 5:00 p.m., prevailing Eastern Time, on the date that is twenty-one (21) days following service of an order approving the rejection of any executory contract or unexpired lease of the Debtor (the "**Rejection Bar Date**" and, collectively with the General Bar Date, the Governmental Bar Date, the Amended Schedules Bar Date, the "**Bar Dates**").

11. Notice of the Bar Dates was provided by mail and publication in accordance with the procedures outlined in the Bar Date Order [Docket No. 203].

THE CLAIMS PROCESS

12. The claims register, prepared and maintained by Kurtzman Carson Consultants, LLC dba Verita Global ("**Verita**"), the Debtor's court-appointed claims and noticing agent, shows that, as of the date hereof, over 185 proofs of claim have been filed in this chapter 11 case. At this time, the Debtor, with the assistance of its advisors, is principally focused on reviewing and reconciling (a) the Amended Claims, (b) proofs of claim which assert secured, priority or administrative status, including with respect to claims allegedly arising under section 503(b)(9) of the Bankruptcy Code, and (c) proofs of claim for which the Debtor asserts it has no liability.

BASIS FOR RELIEF

13. Section 502(a) of the Bankruptcy Code provides, in pertinent part, that "[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). Once an objection to a claim is filed, the Court, after notice and hearing, shall determine the allowed amount of the claim. 11 U.S.C. § 502(b).

THE AMENDED CLAIMS

14. The Amended Claims identified under the heading "Claim to Be Disallowed" on Schedule 1 to the Proposed Order have been amended and superseded by the subsequently filed claims listed under the heading titled "Remaining Claim" on Schedule 1 to the Proposed Order. The Amended Claims thus no longer represent valid claims against the Debtor's estate. Moreover, the Amended Claims remain on the claims register only as a technicality and may be eliminated without affecting such claimant's "Remaining Claim."

15. Any failure to disallow and expunge the Amended Claims will result in the claimants potentially receiving an unwarranted double recovery against the Debtor's estate, to the

detriment of other creditors in this chapter 11 case. Accordingly, the Debtor objects to the Amended Claims and requests entry of the Proposed Order disallowing and expunging the Amended Claims in their entirety. Such relief will not prejudice these claimants because they will continue to hold their "Remaining Claim," subject to the Debtor's right to object to each "Remaining Claim" on any other grounds that the Debtor discovers or elects to pursue.

16. Accordingly, the Debtor objects to the Amended Claims and requests entry of the Proposed Order disallowing and expunging the Amended Claims in their entirety.

RESPONSES TO THIS OBJECTION

17. To contest the Debtor's determinations with respect to the relief requested in this Objection, a claimant must file and serve a written response to this Objection (a "**Response**") so that it is received no later than **May 8, 2026 at 4:00 p.m. (Prevailing Eastern Time)** (the "**Response Deadline**"). Each Response to this Objection must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware: 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon counsel to the Debtor, Young Conaway Stargatt & Taylor, LLP, 1000 N. King St., Wilmington, Delaware 19801, Attn: Elizabeth S. Justison and Andrew M. Lee.

18. Each Response to this Objection must, at a minimum, contain the following information:

a. a caption setting forth the name of the Court, the name of the Debtor, the above captioned case number, and the title of the Objection to which the Response is directed;

b. the name of the claimant, the claim number, and a description of the basis for the amount of the claim;

c. the specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;

d. all documentation and other evidence, to the extent it was not included with the proof of claim previously filed with the clerk or Verita, upon which the claimant will rely to support the basis for and amounts asserted in the proof of claim and in opposing this Objection; and

e. the name, address, telephone number, fax number or email address of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Debtor should communicate with respect to the claim or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the applicable Amended Claims on behalf of the claimant.

19. If a claimant fails to timely file and serve a Response by the Response Deadline, the Debtor will present to the Court an appropriate order substantially in the form of the Proposed Order without further notice to the claimant or, potentially, a hearing.

20. The Debtor reserves the right to seek an adjournment of the hearing on any Response to this Objection, which adjournment will be noted on the notice of agenda for the hearing.

SEPARATE CONTESTED MATTERS

21. To the extent a Response is filed regarding any claim affected by this Objection and the Debtor is unable to resolve the Response, the objection by the Debtor to such claim asserted herein shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in this Objection shall be deemed a separate order with respect to each claim subject thereto.

COMPLIANCE WITH LOCAL RULE 3007-1

22. To the best of the Debtor's knowledge and belief, this Objection and related exhibits comply with Local Rule 3007-1. To the extent that this Objection does not comply in all respects with the requirements of Local Rule 3007-1, the undersigned believes such deviations are not material and respectfully requests that any such requirement be waived.

RESERVATION OF RIGHTS

23. The Debtor hereby reserves the right to object in the future to any of the proofs of claim affected by this Objection on any ground, including, but not limited to, section 502(d) of the Bankruptcy Code, and to amend, modify, or supplement this Objection, including, without limitation, to object to amended or newly-filed claims.

24. Notwithstanding anything contained in this Objection, the Proposed Order or the schedule attached thereto, nothing herein shall be construed as a waiver of any rights that the Debtor may have to exercise rights of setoff against holders of such claims.

NOTICE

25. Notice of this Objection will be given to: (a) the U.S. Trustee; (b) counsel to The Chernin Group; (c) counsel to the Committee; (d) each of the claimants whose claim is subject to this Objection; and (e) all parties entitled to notice pursuant to Bankruptcy Rule 2002. The Debtor submits that, under the circumstances, no other or further notice is required.

[*Remainder of Page Intentionally Left Blank*]

WHEREFORE, the Debtor respectfully requests that the Court enter the Proposed Order granting the relief requested in this Objection and such other and further relief as may be just and proper.

Dated: April 17, 2026
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Andrew M. Lee

Michael R. Nestor (No. 3526)
Kara Hammond Coyle (No. 4410)
Elizabeth S. Justison (No. 5911)
Andrew M. Lee (No. 7078)
Brynna M. Gaffney (No. 7402)
Rodney Square
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Wilmington, Delaware 19801
Telephone: (302) 571-6600
Emails: mnestor@ycst.com
kcoyle@ycst.com
ejustison@ycst.com
alee@ycst.com
bgaffney@ycst.com

Counsel for the Debtor
and Debtor in Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
SALT HOUSE, INC.,[1]	Case No. 25-12277 (LSS)
Debtor.	**Hearing Date: May 19, 2026 at 11:00 a.m. (ET)** **Response Deadline: May 8, 2026 at 4:00 p.m. (ET)**

NOTICE OF DEBTOR'S FIRST
(NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CLAIMS

PARTIES RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND THEIR DISPUTED CLAIMS IDENTIFIED ON SCHEDULE 1 TO THE PROPOSED ORDER ATTACHED TO THE OBJECTION.

PLEASE TAKE NOTICE that the above-captioned debtor and debtor-in-possession (the "**Debtor**") has filed the attached *Debtor's First (Non-Substantive) Omnibus Objection to Claims* (the "**Objection**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").

PLEASE TAKE FURTHER NOTICE that any responses (each, a "**Response**") to the relief requested in the Objection must be filed on or before **May 8, 2026 at 4:00 p.m. (ET)** (the "**Response Deadline**") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, any party submitting a Response must serve a copy of its Response upon the undersigned counsel to the Debtor so as to be received on or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE that any Response must contain, at a minimum, the following:

a. a caption setting forth the name of the Court, the name of the Debtor, the above captioned case number, and the title of the Objection to which the Response is directed;

b. the name of the claimant, the claim number, and a description of the basis for the amount of the claim;

c. the specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;

[1] The Debtor in this chapter 11 case is Salt House, Inc. (f/k/a Food52, Inc.) and the last four digits of the Debtor's federal tax identification number are 2738. For the purpose of this chapter 11 case, the Debtor's service address is 1 Dock 72 Way, 13th Floor, Brooklyn, New York 11205.

d. all documentation and other evidence, to the extent it was not included with the proof of claim previously filed with the clerk or Verita, upon which the claimant will rely to support the basis for and amounts asserted in the proof of claim and in opposing this Objection; and

e. the name, address, telephone number, fax number or email address of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Debtor should communicate with respect to the claim or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the applicable Amended Claims on behalf of the claimant.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE OBJECTION WILL BE HELD ON **MAY 19, 2026 AT 11:00 A.M. (ET)** BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, UNITED STATES BANKRUPTCY JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 2 WILMINGTON, DE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU ARE A CLAIMANT AND FAIL TO TIMELY FILE AND SERVE A RESPONSE IN ACCORDANCE WITH THE ABOVE REQUIREMENTS, YOU WILL BE DEEMED TO HAVE CONCURRED WITH AND CONSENTED TO THE OBJECTION AND THE RELIEF REQUESTED THEREIN, AND THE DEBTOR WILL PRESENT TO THE COURT, WITHOUT FURTHER NOTICE TO YOU, THE PROPOSED ORDER SUSTAINING THE OBJECTION.

PLEASE TAKE FURTHER NOTICE THAT QUESTIONS CONCERNING THE OBJECTION SHOULD BE DIRECTED TO THE UNDERSIGNED COUNSEL FOR THE DEBTOR. CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE COURT TO DISCUSS THE MERITS OF THEIR DISPUTED CLAIMS OR THE OBJECTION.

[*Signature Page Follows*]

Dated: April 17, 2026
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Andrew M. Lee

Michael R. Nestor (No. 3526)
Kara Hammond Coyle (No. 4410)
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Counsel for the Debtor
and Debtor in Possession

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
SALT HOUSE, INC.,[1]	Case No. 25-12277 (LSS)
Debtor.	**Ref: Docket No. ___**

ORDER SUSTAINING THE DEBTOR'S FIRST (SUBSTANTIVE)
OMNIBUS OBJECTION TO CLAIMS

Upon the objection (the "**Objection**")[2] of the above-captioned debtor and debtor in possession (the "**Debtor**") for the entry of this order (this "**Order**") disallowing and expunging certain proofs of claim set forth on **Schedule 1**, as more fully set forth in the Objection; and upon consideration of the Robinson Declaration; and this Court having reviewed the Objection and the Robinson Declaration; and this Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court 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 Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and this Court having determined that the relief requested in the

[1] The Debtor in this chapter 11 case is Salt House, Inc. (f/k/a Food52, Inc.) and the last four digits of the Debtor's federal tax identification number are 2738. For the purpose of this chapter 11 case, the Debtor's service address is 1 Dock 72 Way, 13th Floor, Brooklyn, New York 11205.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

Objection is in the best interests of the Debtor, its estate, its creditors, and other parties in interest; and good and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT**:

1. The Objection is **SUSTAINED** as provided herein.

2. Each claim listed on **Schedule 1** attached hereto is hereby disallowed and expunged in its entirety.

3. The Debtor's objection to each claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.

4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtor's rights to object on any other grounds that the Debtor discovers during the pendency of this chapter 11 case is preserved.

5. The Debtor's right to amend, modify, or supplement the Objection, to file additional objections to any other claims (filed or not) which may be asserted, including the Remaining Claims, and to seek further reduction of any claim to the extent such claim has been paid, are preserved, and nothing included in or omitted from the Objection is intended or shall be deemed to impair, prejudice, waive or otherwise affect any rights, claims, or defenses of the Debtor and its estate with respect to the claims addressed in the Objection.

6. The Debtor and the Debtor's claims and noticing agent, Kurtzman Carson Consultants, LLC dba Verita Global, and the Clerk of this Court are authorized to take all steps necessary or appropriate to carry out this Order.

7. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation or enforcement of this Order.

Schedule 1

Amended Claims

Food52

Non-Substantive Schedules - Amended or Superseded Claims

	CLAIMS TO BE DISALLOWED AND EXPUNGED					SURVIVING CLAIMS			
	Name and address of claimant	Claim #	Claim Amount	Priority	Reason for Disallowance	Name and address of claimant	Claim #	Claim Amount	Priority
1	Adswerve, Inc.	18	$0.00	(S)	Replaced by Claim 140	Adswerve, Inc.	140	$0.00	(S)
	Legal Department		$0.00	(A)		999 18th Street		$0.00	(A)
	999 18th St, Suite 2301N		$0.00	(P)		Denver CO 80202		$0.00	(P)
	Denver CO 80202		$74,723.90	(U)				$78,452.91	(U)
			$74,723.90	(T)				$78,452.91	(T)
2	Colonial Bronze Company	123	$0.00	(S)	Replaced by claim 124	Colonial Bronze Company	124	$0.00	(S)
	Joanne Gregg		$0.00	(A)		511 Winsted Road		$0.00	(A)
	511 Winsted Road		$0.00	(P)		Torrington CT 06790		$0.00	(P)
	Torrington CT 06790		$16,022.89	(U)				$15,465.32	(U)
			$16,022.89	(T)				$15,465.32	(T)
3	Essem Design AB	61	$0.00	(S)	Replaced by Claim 145	Essem Design AB	145	$0.00	(S)
	Frida Bladh		$0.00	(A)		Frida Bladh		$0.00	(A)
	Nennesmovagen 9		$0.00	(P)		Nennesmovagen 9		$0.00	(P)
	Anderstorp Jonkoping 33433 Sweden		$12,800.00	(U)		Anderstorp Jonkoping 33433 Sweden		$12,480.00	(U)
			$12,800.00	(T)				$12,480.00	(T)
4	Euler Hermes Agent for Janel Group, Inc.	41	$0.00	(S)	Replaced by claim 48	Euler Hermes Agent for Janel Group, Inc.	48	$0.00	(S)
	Guy P Young Jr		$67,140.37	(A)		Guy P Young Jr		$120,787.43	(A)
	100 International Dr 22nd Fl		$0.00	(P)		100 International Dr 22nd Fl		$179,275.97	(P)
	Baltimore MD 21202		$513,751.28	(U)		Baltimore MD 21202		$460,104.22	(U)
			$580,891.65	(T)				$760,167.62	(T)
5	Texteis Colmaco - Industria Colchas LDA.	36	$0.00	(S)	Replaced by claim 103	Texteis Colmaco - Industria Colchas LDA.	103	$0.00	(S)
	Cristina Moreira		$0.00	(A)		Cristina Moreira		$0.00	(A)
	Rua dos Verdes, 492		$0.00	(P)		Rua dos Verdes, 492		$0.00	(P)
	Pedome VNF 4765-167 Portugal		$73,612.00	(U)		Pedome VNF 4765-167 Portugal		$73,612.00	(U)
			$73,612.00	(T)				$73,612.00	(T)

EXHIBIT B

Declaration of Heidi Robinson

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
SALT HOUSE, INC.,[1]	Case No. 25-12277 (LSS)
Debtor.	

DECLARATION OF HEIDI ROBINSON IN SUPPORT OF DEBTOR'S FIRST (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CLAIMS

I, Heidi Robinson, hereby make this Declaration pursuant to U.S.C. § 1746:

1. I am an independent contractor and the former Chief Financial Officer and Chief Operating Officer of Salt House, Inc. (f/k/a Food52, Inc.) (the "**Debtor**" or the "**Company**"), having served in that position since my appointment in October 2025. As such, I am familiar with the day-to-day operations, businesses, financial affairs, and books and records of the Company.

2. I submit this declaration (this "**Declaration**") in support of the *Debtor's First (Non-Substantive) Omnibus Objection to Claims* (the "**Omnibus Objection**").[2]

3. All statements in this Declaration are based upon my personal knowledge, my review (or the review of others under my supervision) of (a) business books and records kept by the Debtor in the ordinary course of business, (b) the relevant proofs of claim, (c) the Schedules, and (d) the official claims register filed in the Debtor's case.

4. The proofs of claim subject to the Omnibus Objection were carefully reviewed and analyzed in good faith using due diligence by, among others, appropriate personnel of the Debtor,

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[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Omnibus Objection.

MERU, LLC—the Debtor's financial advisor, and Kurtzman Carson Consultants, LLC dba Verita Global—the Debtor's court-appointed claims and noticing agent. These efforts resulted in identifying the Amended Claims identified in Schedule 1 to the Proposed Order.

5. After carefully reviewing the Amended Claims in good faith, utilizing due diligence by appropriate personnel, I believe that each Amended Claim listed on Schedule 1 to the Proposed Order has been amended and superseded by a subsequently filed claim. I believe that the Amended Claims thus no longer represent valid claims against the Debtor's estate. Moreover, the Amended Claims remain on the claims register only as a technicality and may be eliminated without affecting such claimant's remaining claim. If the Amended Claims are not disallowed and expunged, the Amended Claims will result in the claimants potentially receiving an unwarranted double recovery against the Debtor's estate, to the detriment of other creditors in this chapter 11 case. In addition, I believe that disallowing and expunging the Amended Claims will enable the Debtor to maintain a more accurate claims register.

6. Based on the foregoing, and to the best of my knowledge, information, and belief, the information contained in the Omnibus Objection and the exhibits and schedules attached thereto is true and accurate.

7. Accordingly, the Debtors request that the Court disallow and expunge the Amended Claims listed on Schedule 1 to the Proposed Order.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: April 17, 2026

/s/ *Heidi Robinson*
Heidi Robinson
Authorized Signatory

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