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)** **Objection Deadline: May 6, 2026 at 4:00 p.m. (ET)**

DEBTOR'S MOTION FOR ENTRY OF AN ORDER EXTENDING THE EXCLUSIVE PERIODS FOR THE FILING OF A CHAPTER 11 PLAN AND SOLICITATION OF ACCEPTANCES THEREOF

The above-captioned debtor and debtor-in-possession (the "**Debtor**") hereby submits this motion (this "**Motion**") for entry of an order (the "**Proposed Order**"), substantially in the form attached hereto as **Exhibit A**, extending each of the Exclusive Periods (as defined below) by approximately ninety (90) days. Unless extended, the Plan Period and Solicitation Period (each as defined below) will expire on April 28, 2026, and June 29, 2026, respectively. The Debtor seeks to extend the Plan Period and Solicitation Period through and including July 27, 2026, and September 28, 2026,[2] respectively, without prejudice to the Debtor's right to seek further extensions of the Exclusive Periods.[3] In support of this Motion, the Debtor respectfully represents as follows:

[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] The 90-day extension of the Solicitation Period (as defined below) falls on a Sunday. Pursuant to Rule 9006(a) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), the Debtor is requesting that the deadline be continued to the following Monday, September 28, 2026.

[3] Pursuant to Rule 9006-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Rules**"), the filing of this Motion prior to the expiration of the current Exclusive Periods shall automatically extend the Exclusive Periods until the Court acts on this Motion without the necessity for entry of a bridge order. *See* Del. Bankr. L.R. 9006-2.

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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 within the meaning of 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 Local Rule 9013-1(f), the Debtor consents to the entry of a final judgment or order with respect to this Motion 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 section 1121(d) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "**Bankruptcy Code**"), Bankruptcy Rule 9006, and Local Rule 9006-2.

BACKGROUND

A. General 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* [Docket No. 2].

B. The Sales of Substantially All of the Debtor's Assets and the Proposed Plan

5. Through this chapter 11 case, the Debtor sold substantially all of its assets for an aggregate purchase price of $13,375,000 through the sale of the Debtor's three businesses: Food52, Schoolhouse, and Dansk [Docket No. 210, 211, 212, 215 & 268]. The proceeds from the sales were applied in full satisfaction of the outstanding obligations under the DIP Credit Agreement, in the amount of $3,420,000 plus accrued and unpaid interest and fees, and the Debtor's investment banker's fee was paid, subject to subsequent Court approval following the filing of a final fee application.

6. The next phase of this chapter 11 case is the confirmation and consummation of a chapter 11 plan, pursuant to which the Debtor will liquidate and distribute its remaining assets, including the remaining sale proceeds, in accordance with the priority scheme set forth in the Bankruptcy Code.

7. In furtherance thereof, on March 6, 2026, the Debtor filed the *Chapter 11 Plan of Liquidation for Salt House, Inc.* [Docket No. 258] (as may be amended, modified, or supplemented from time to time, the "**Proposed Plan**") and a related disclosure statement [Docket No. 259] (as may be amended, modified, or supplemented from time to time, the "**Disclosure Statement**"). The Proposed Plan and the Disclosure Statement were subsequently revised on March 25, 2026 [Docket Nos. 290 & 291].

8. On March 27, 2026, the Court entered an order [Docket No. 301] (the "**Disclosure Statement Order**") conditionally approving the Disclosure Statement for solicitation purposes

only, approving procedures for the tabulation of votes to accept or reject the Proposed Plan, and scheduling a combined hearing (the "**Combined Confirmation Hearing**") on final approval of the Disclosure Statement and confirmation of the Plan for May 19, 2026.[4]

9. In light of the progress the Debtor has made in this chapter 11 case to date, it seeks a short extension of the Exclusive Periods (as defined below) out of an abundance of caution as it works towards confirmation of the Proposed Plan. The Debtor believes that maintaining its exclusive right to file and solicit votes on a chapter 11 plan for a reasonable period of time is essential to its ability to wind down its estate without risking the additional costs, disruption, and uncertainty that could arise from the expiration of the Exclusive Periods.

RELIEF REQUESTED

10. By this Motion, out of an abundance of caution, the Debtor requests entry of the Proposed Order extending the Plan Period and Solicitation Period (each as defined below) by approximately ninety (90) days, through and including July 27, 2026, and September 28, 2026, respectively, without prejudice to the Debtor's right to seek additional extensions of the Exclusive Periods (as defined below).

BASIS FOR RELIEF

11. Section 1121(b) of the Bankruptcy Code provides for an initial period of 120 days after commencement of a chapter 11 case during which a debtor has the exclusive right to propose and file a chapter 11 plan (the "**Plan Period**"). If a debtor files a plan during the Plan Period, section 1121(c)(3) of the Bankruptcy Code provides a debtor with an additional 60 days following the expiration of such Plan Period (or 180 days following the commencement of the case) to solicit acceptances of the plan without competing plan filings (the "**Solicitation Period**," and together

[4] On March 17, 2026, the Debtor subsequently filed the solicitation version of the Disclosure Statement [Docket No. 302].

with the Plan Period, the "**Exclusive Periods**"). Section 1121(d) of the Bankruptcy Code permits the Court to extend the Exclusive Periods for "cause." For the reasons set forth herein, "cause" exists to extend the Exclusive Periods.

I. Section 1121(d) of the Bankruptcy Code Permits the Court to Extend the Exclusive Periods "for Cause"

12. The Exclusive Periods are designed to provide a debtor with a full and fair opportunity to propose a consensual plan and solicit acceptances of such plan, without disruption to the administration of the estate that may result from the filing of competing plans by non-debtor parties. To this end, where the Exclusive Periods prove to be unfeasible timeframes, section 1121(d) of the Bankruptcy Code allows the Court to extend such Exclusive Periods for cause.[5] Although the Bankruptcy Code does not define the term "cause," the legislative history indicates it is intended to be a flexible standard to balance the competing interests of a debtor and its creditors. *See* H.R. REP. NO. 95–595, at 231–32 (1978), *reprinted in* 1978 U.S.C.C.A.N. 5787, 6191 (noting that Congress intended to give bankruptcy courts flexibility to protect a debtor's interests by allowing unimpeded opportunity to negotiate settlement of debts without interference from other parties in interest).

13. Congress built flexibility into section 1121 of the Bankruptcy Code to give a debtor sufficient opportunity to stabilize its business operations at the outset of its chapter 11 case and to negotiate an effective plan with its creditors. *See In re Newark Airport/Hotel Ltd. P'ship*, 156 B.R. 444, 451 (Bankr. D. N.J.), *aff'd*, 155 B.R. 93 (D.N.J. 1993) (noting that Congress designed chapter 11 provisions to enable a debtor to remain in control for some period of time,

[5] Pursuant to section 1121(d)(2)(A) of the Bankruptcy Code, the Plan Period may not be extended beyond a date that is eighteen months after the commencement of a chapter 11 case. Pursuant to section 1121(d)(2)(B) of the Bankruptcy Code, the Solicitation Period may not be extended beyond a date that is twenty months after the commencement of a chapter 11 case.

thereby making reorganization an attractive alternative to financially troubled companies); *see also Gaines v. Perkins* (*In re Perkins*), 71 B.R. 294, 297–98 (W.D. Tenn. 1987) (Congress designed section 1121 of the Bankruptcy Code to give the debtor time to reach an agreement with its creditors regarding a plan of reorganization.).

14. In making the determination to affirm or deny a request to extend the Exclusive Periods for "cause," courts have considered a variety of factors, including:

(a) the size and complexity of the debtor's case;

(b) the necessity of sufficient time to negotiate and prepare adequate information;

(c) the existence of good-faith progress towards reorganization;

(d) whether the debtor is paying its debts as they become due;

(e) whether the debtor has made progress negotiating with creditors;

(f) the length of time a case has been pending;

(g) whether the debtor is seeking an extension to pressure creditors; and

(h) whether or not unresolved contingencies exist.

In re Cent. Jersey Airport Servs., LLC, 228 B.R. 176, 184 (Bankr. D.N.J. 2002) (citations omitted); *see also In re McLean Indus., Inc.*, 87 B.R. 830, 834 (Bankr. S.D.N.Y. 1987) (citing to most of the factors listed above in determining whether to extend the exclusive periods); *In re United Press Int'l, Inc.*, 60 B.R. 265, 269 (Bankr. D.D.C. 1986) (holding that the debtor showed "cause" to extend its exclusive period based upon certain of the above-quoted factors).

15. Not all of the above factors are relevant to every case, and courts may consider the relevant subset of factors to determine whether cause exists to grant an exclusivity extension in a particular chapter 11 case. *See, e.g., In re Express One Int'l, Inc.*, 194 B.R. 98, 100-01 (Bankr. E.D. Tex. 1996) (identifying four of the factors as relevant in determining whether "cause" exists to extend exclusivity); *In re United Press Int'l, Inc.*, 60 B.R. 265, 269 (Bankr. D.D.C. 1986)

(finding that the debtor showed "cause" to extend exclusivity based upon three of the factors); *In re Pine Run Tr., Inc.*, 67 B.R. 432, 435 (Bankr. E.D. Pa. 1986) (relying on two factors in holding that cause existed to extend exclusivity). As detailed below, the facts and circumstances of this chapter 11 case justify extending the Exclusive Periods.

II. Cause Exists for an Extension of the Exclusive Periods

16. Cause exists for an extension of the Exclusive Periods given the progress the Debtor has made thus far. The Debtor worked with its major stakeholders, including the Committee, to file the Proposed Plan and Disclosure Statement promptly following the closing of the sales. The Court entered the Disclosure Statement Order thereafter and scheduled the Combined Confirmation Hearing for May 19, 2026. The Debtor intends to continue working constructively with the Committee and other stakeholders to obtain confirmation of the Proposed Plan at the Combined Confirmation Hearing.

17. An extension of the Exclusive Periods is also warranted due to the numerous burdens imposed by the Debtor's chapter 11 efforts, which have required a significant expenditure of time and effort on the part of the Debtor and its professional advisors, particularly because the Debtor has limited resources to assist it in its efforts. To that end, the Debtor has, among other things: (a) prepared and prosecuted various "first day" and "second day" pleadings; (b) completed a robust marketing and sale process to sell substantially all of its assets pursuant to Court-approved bidding procedures and obtained Court approval of and closed the sales [Docket Nos. 80, 210-212, 215 & 268]; (c) complied with U.S. Trustee reporting requirements, including by preparing and filing its Rule 2015.3 report [Docket No. 113], schedules of assets and liabilities [Docket No. 141], statements of financial affairs [Docket No. 142], and monthly operating reports [Docket Nos. 136, 228 & 277]; (d) obtained entry of an interim order [Docket No. 41] and a final order [Docket No. 134] authorizing the Debtor to obtain debtor in possession financing, and paid off such

financing with sale proceeds; (e) retained professionals; (f) obtained entry of a bar date order [Docket No. 199] establishing deadlines for submitting proofs of claim and provided notice thereof to all parties; (g) worked with the U.S. Trustee and the Committee on various matters, including responding to various diligence requests; (h) filed the Proposed Plan and Disclosure Statement, and obtained entry of the Disclosure Statement Order; (i) filed omnibus claim objections [Docket Nos. 326 & 328]; (j) responded to various creditor inquiries and demands; and (k) handled various other tasks related to the administration of the Debtor's estate and the chapter 11 case.

18. Extensive resources have been required of the Debtor and its professionals to achieve the measures reached in this chapter 11 case. In light of these circumstances, the Debtor submits that extension of the Exclusive Periods is appropriate and necessary to afford the Debtor sufficient time to solicit acceptance of, and confirm, the Proposed Plan.

III. Other Relevant Factors Favor Extending the Exclusive Periods

A. The Size, Complexity, and Duration of the Chapter 11 Case

19. This Motion is the Debtor's first request to extend the Exclusive Periods. In the four months since the Petition Date, the Debtor has addressed critical case management issues in an effort to maximize the value of the Debtor's estate and sell substantially all of the Debtor's assets. The complexity of the various issues addressed, and the time, effort, and planning required to obtain the progress made thus far, warrant the requested extension of the Exclusive Periods.

B. Good Faith Progress Made in the Chapter 11 Case

20. The Debtor has made significant and material progress in this chapter 11 case. As discussed above, these achievements were the result of the extensive efforts of the Debtor, its management, and its professional advisors, in cooperation with various parties in interest in this chapter 11 case, to maximize the value of the Debtor's estate. Accordingly, the Debtor submits that this factor weighs in favor of extending the Exclusive Periods.

C. The Necessity of Sufficient Time to Negotiate and Prepare Adequate Information

21. As set forth above, since the Petition Date, the Debtor and its professionals have focused substantially all of their time, energy, and resources on smoothly transitioning into chapter 11, addressing critical case management issues, marketing the Debtor's assets in connection with a postpetition sale process, and closing on the sales, all in an effort to maximize the value of the Debtor's estate. The Debtor believes that, in light of the progress that the Debtor and other professionals have made in this chapter 11 case over the past four months, and the Debtor's demonstrated efforts to work cooperatively with its stakeholders, it is reasonable and appropriate that the Debtor be granted an extension of the Exclusive Periods. Accordingly, the Debtor submits that this factor weighs in favor of extending the Exclusive Periods.

D. The Debtor is Paying Its Debts as They Come Due

22. The Debtor continues to pay undisputed postpetition obligations on a timely basis. As such, the requested extension of the Exclusive Periods will afford the Debtor a meaningful opportunity to solicit votes on a plan and negotiate with key parties to confirm a plan without prejudice to the parties in interest in this chapter 11 case.

E. The Debtor is Not Seeking an Extension to Pressure Creditors

23. Throughout this chapter 11 process, the Debtor has endeavored to establish and maintain cooperative working relationships with its primary creditor constituencies. Importantly, the Debtor is not seeking the extension of the Exclusive Periods to delay administration of this chapter 11 case or to exert pressure on its creditors, but rather to continue the orderly, efficient, and cost-effective chapter 11 process. Thus, this factor also weighs in favor of the requested extension of the Exclusive Periods.

F. Termination of the Debtor's Exclusive Periods Would Adversely Impact the Chapter 11 Case

24. Termination of the Exclusive Periods would adversely impact the Debtor's efforts to preserve and maximize the value of the estate and the progress of this chapter 11 case. In effect, if the Court were to deny the Debtor's request for an extension of the Exclusive Periods, any party in interest would be free to propose an alternative chapter 11 plan for the Debtor. Terminating the Exclusive Periods would only foster a chaotic environment and cause opportunistic parties to engage in counterproductive behavior in pursuit of alternatives that are neither value-maximizing nor feasible under the circumstances of this chapter 11 case.

25. Based upon the foregoing, the Debtor respectfully submits that cause exists to extend the Exclusive Periods pursuant to section 1121(d) of the Bankruptcy Code. Specifically, the Debtor requests that the Plan Period and Solicitation Period be extended through and including July 27, 2026, and September 28, 2026, respectively, without prejudice to the Debtor's right to seek further extensions of the Exclusive Periods, as may be appropriate under the circumstances.

NOTICE

26. Notice of this Motion will be provided to: (a) the U.S. Trustee; (b) counsel to The Chernin Group; (c) counsel to the Committee; and (d) all parties entitled to notice pursuant to Bankruptcy Rule 2002. The Debtor submits that, under the circumstances, no other or further notice is required.

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

Dated: April 22, 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)
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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)**
	Objection Deadline: **May 6, 2026 at 4:00 p.m. (ET)**

NOTICE OF MOTION

PLEASE TAKE NOTICE that the above-captioned debtor and debtor in possession (the "**Debtor**") filed the *Debtor's Motion for Entry of an Order Extending the Exclusive Periods for the Filing of a Chapter 11 Plan and Solicitation of Acceptances Thereof* (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before **May 6, 2026 at 4:00 p.m. (ET)** (the "**Objection Deadline**") with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon the undersigned counsel to the Debtor so as to be received on or before the Objection Deadline.

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

PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

[*Signature Page Follows*]

[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.

Dated: April 22, 2026
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Andrew M. Lee

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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 EXTENDING THE EXCLUSIVE PERIODS FOR THE FILING OF A CHAPTER 11 PLAN AND SOLICITATION OF ACCEPTANCES THEREOF

Upon consideration of the motion (the "**Motion**")[2] of the above-captioned debtor and debtor in possession (the "**Debtor**") for the entry of an order (this "**Order**") extending the Plan Period and Solicitation Period through and including July 27, 2026, and September 28, 2026, respectively, as more fully set forth in the Motion; and upon consideration of the record of this chapter 11 case; and due and proper notice of the Motion having been given; and it appearing that no other or further notice of the Motion is required except as otherwise provided herein; and it appearing that this Court has jurisdiction to consider the Motion in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having reviewed the Motion and having heard the statements in support of the relief requested in the Motion at a hearing before this Court, if any; and it appearing that the relief requested in the Motion and provided for herein is in

[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 them in the Motion.

the best interest of the Debtor, its estate, and its creditors; and after due deliberation and sufficient cause appearing therefore, **IT IS HEREBY ORDERED ADJUDGED AND DECREED THAT**:

1. The Motion is **GRANTED** as set forth herein.

2. The Plan Period is extended through and including July 27, 2026, pursuant to section 1121(d) of the Bankruptcy Code.

3. The Solicitation Period is extended through and including September 28, 2026, pursuant to section 1121(d) of the Bankruptcy Code.

4. The relief granted herein shall not prejudice the Debtor from seeking further extensions made pursuant to section 1121(d) of the Bankruptcy Code.

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