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 Nos. 9, 127, 227, 231, 284 & 285**

CERTIFICATION OF COUNSEL REGARDING THIRD SUPPLEMENTAL ORDER FURTHER EXTENDING THE DEBTOR'S TIME TO COMPLY WITH SECTION 345(b) OF THE BANKRUPTCY CODE AND U.S. TRUSTEE GUIDELINES

On December 29, 2025, the above-captioned debtor and debtor in possession (the "**Debtor**") filed the *Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing and Approving Continued Use of Cash Management System, (II) Authorizing Use of Prepetition Bank Accounts and Business Forms, (III) Waiving Certain Operating Guidelines and Suspending the Time to Comply with Section 345(b) of the Bankruptcy Code, and (IV) Granting Certain Related Relief* [Docket No. 9] (the "**Cash Management Motion**")[2] with the United States Bankruptcy Court for the District of Delaware (the "**Court**"). By the Cash Management Motion, the Debtor requested, among other things, a suspension of the requirements (the "**345(b) Requirements**") of section 345(b) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532, for a limited period of time so that the Debtor could continue using its Bank Accounts maintained at Avid.

As discussed more fully in the Cash Management Motion, all of the Debtor's Bank Accounts are with Banks that are Authorized Depositories, with the exception of Avid. However,

[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 Cash Management Motion.

25122772604220000000000003

Avid is well-capitalized, financially stable, and insured by the FDIC. The Debtor has historically used the Avid Bank Accounts to collect certain accounts receivable, and those funds are subsequently transferred to an SVB Bank Account.[3] The Debtor confirms that it will complete a sweep of the cash currently held in the Avid Bank Accounts to an SVB Bank Account during the week of April 22, 2026. SVB is an Authorized Depository, and the proceeds from the sales of the Debtor's assets, *see* Docket No. 215, are held in an SVB Bank Account.

On January 21, 2026, the Court entered an order granting the Cash Management Motion on a final basis [Docket No. 127], providing the Debtor with a thirty (30) day extension of time to come into compliance with the 345(b) Requirements (the "**345(b) Compliance Deadline**"), without prejudice to seeking further extensions.

Following discussions with the Office of the United States Trustee for the District of Delaware (the "**U.S. Trustee**") and the Official Committee of Unsecured Creditors (the "**Committee**" and, together with the U.S. Trustee, the "**Parties**"), the Debtor previously submitted proposed orders under certification of counsel [Docket Nos. 227 & 284] requesting extensions of the 345(b) Compliance Deadline, which the Court entered [Docket Nos. 231 & 285]. The current 345(b) Compliance Deadline is April 22, 2026.

Following additional discussions with the Parties, the Parties have agreed not to oppose a further extension of the 345(b) Compliance Deadline for an additional thirty (30) days. Consequently, the Debtor is hereby submitting a supplemental order (the "**Supplemental Cash Management Order**") extending the 345(b) Compliance Deadline through and including May 22, 2026. The Parties do not object to entry of the Supplemental Cash Management Order.

[3] The Debtor sold the Purchased 2025 Media Receivables through the *Second Amendment to Amended and Restated Asset Purchase Agreement* (as defined therein) [Docket No. 268]. Nevertheless, the Debtor seeks to continue using the Avid Bank Accounts out of an abundance of caution in case any accounts receivable payments are made into the Avid Bank Accounts.

WHEREFORE, the Debtor respectfully requests entry of the Supplemental Cash Management Order, substantially in the form attached hereto as **Exhibit A**, at the earliest convenience of the Court.

Dated: April 22, 2026
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ James C. Diver
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)
James C. Diver (No. 7568)
Rodney Square
1000 N. King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Emails: mnestor@ycst.com
kcoyle@ycst.com
ejustison@ycst.com
alee@ycst.com
bgaffney@ycst.com
jdiver@ycst.com

Counsel for the Debtor
and Debtor in Possession

EXHIBIT A

Supplemental Cash Management 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 Nos. 9, 127, 231 & 285**

THIRD SUPPLEMENTAL ORDER FURTHER EXTENDING THE DEBTOR'S TIME TO COMPLY WITH SECTION 345(b) OF THE BANKRUPTCY CODE AND U.S. TRUSTEE GUIDELINES

Upon the *Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing and Approving Continued Use of Cash Management System, (II) Authorizing Use of Prepetition Bank Accounts and Business Forms, (III) Waiving Certain Operating Guidelines and Suspending the Time to Comply with Section 345(b) of the Bankruptcy Code, and (IV) Granting Certain Related Relief* [Docket No. 9] (the "**Cash Management Motion**");[2] and upon consideration of the *Final Order (I) Authorizing and Approving Continued Use of Cash Management System, (II) Authorizing Use of Prepetition Bank Accounts and Business Forms, (III) Waiving Certain Operating Guidelines and Suspending the Time to Comply with Section 345(b) of the Bankruptcy Code, and (IV) Granting Certain Related Relief* [Docket No. 127] (the "**Final Cash Management Order**"), entered on January 21, 2026; and upon consideration of the *Supplemental Order Further Extending the Debtor's Time to Comply with Section 345(b) of the Bankruptcy Code and U.S. Trustee Guidelines* [Docket No. 231], entered on February 24, 2026; and upon consideration of the *Second Supplemental Order Further Extending the Debtor's Time to Comply with Section 345(b) of 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 in this supplemental order (the "**Supplemental Order**") shall have the meanings ascribed to them in the Cash Management Motion.

Bankruptcy Code and U.S. Trustee Guidelines [Docket No. 285], entered on March 23, 2026; and due and proper notice of the Cash Management Motion having been given; and it appearing that this Court has jurisdiction to consider this matter in accordance with 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; 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 matter is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Cash Management Motion is GRANTED as set forth herein.

2. To the extent that any of the Debtor's Bank Accounts are not in compliance with section 345(b) of the Bankruptcy Code or any of the U.S. Trustee's requirements or guidelines, the Debtor shall have until **May 22, 2026**, without prejudice to seeking an additional suspension, to come into compliance with the requirements of section 345(b) of the Bankruptcy Code and any of the U.S. Trustee's requirements or guidelines or to make such other arrangements as agreed to by the U.S. Trustee; *provided* that nothing herein shall prevent the Debtor or the U.S. Trustee from seeking further relief from this Court to the extent that an agreement cannot be reached.

3. Nothing in this Supplemental Order shall abrogate or otherwise modify the Final Cash Management Order, except as set forth herein.

4. The Debtor is authorized to take all actions necessary to implement the relief granted in this Supplemental Order.

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