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

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| In re: | Chapter 11 |
| Yardbird Group LLC, *et al.*,[1] | Case No. 26-11479 (BLS) |
| Debtors. | (Jointly Administered) |
| | **Hearing Date: November 9, 2026 at 10:00 a.m. (ET)**<br>**Obj. Deadline: October 27, 2026 at 4:00 p.m. (ET)** |

**DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) EXTENDING TIME TO FILE RULE 2015.3 FINANCIAL REPORT AND (II) GRANTING RELATED RELIEF**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), (i) extending the time to file their 2015.3 Report (defined below) and (ii) granting related relief. In further support of this motion (this "Motion"), the Debtors respectfully state as follows:

## JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (this "Court") has jurisdiction over the above-captioned chapter 11 cases (the "Chapter 11 Cases"), the Debtors, property of the Debtors' estates, and 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* entered February 29, 2012. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: Yardbird Group LLC (7139); Southern Operations, LLC (5384); Yardbird Beverly Hills, LLC (9735); Yardbird DFW, LLC (2545); Yardbird DC, LLC (2651); Yardbird Chicago, LLC (6273); Yardbird Denver LLC (8819); YB Las Vegas, LLC (4071); Yardbird DFW Management LLC (8949); Yardbird DFW Concession LLC (1952); and The Bird Singapore LLC (8264). The location of the Debtors' service address in these chapter 11 cases is 3355 Las Vegas Boulevard South, Las Vegas, Nevada 89109.

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2. Pursuant to rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), the Debtors consent to the entry of a final judgment or order with respect to this Application if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

3. Venue of these Chapter 11 Cases in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested herein are sections 105(a) and 521 of title 11 of the United States Code (the "Bankruptcy Code"), rules 1007(c), 2015.3, and 9006(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rules 1007-1(a) and 9006-2.

## BACKGROUND

5. On September 21, 2026 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code. These Chapter 11 Cases are being jointly administered pursuant to Bankruptcy Rule 1015(b). *See* Docket No. 40. The Debtors are operating their business and managing their properties, as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made, and no official committees have been appointed in these Chapter 11 Cases.

6. The Debtors own and operate "Yardbird Southern Table & Bar," an award-winning polished casual dining concept offering a modern take on traditional Southern American cuisine. Beyond its famed fried chicken, Yardbird is known for its weekend brunch, chef-curated bourbon dinners, and an award-winning mixology program and extensive wine list, all served in an inviting, open atmosphere anchored by signature floor-to-ceiling windows and open kitchens. Event dining

and catering represent a significant portion of the Debtors' revenue, complementing the Debtors' three operating restaurant locations in Dallas, Texas; Washington, D.C.; and Chicago, Illinois, and its two licensed locations in Las Vegas, Nevada and Singapore

7. Additional factual background regarding the Debtors, including their business operations, their corporate and capital structure, and the events leading to the filing of these Chapter 11 Cases is set forth in detail in the *Declaration of Albert Altro in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 2] (the "First Day Declaration").[2]

## RELIEF REQUESTED

8. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A**, (a) extending the deadline by which the Debtors must file their report of financial information with respect to an entity in which the Debtors hold a controlling or substantial interest, as set forth in Bankruptcy Rules Rule 2015.3 (the "2015.3 Report"), or to file a motion with the Court seeking a modification of such reporting requirements for cause, to November 30, 2026, without prejudice to the Debtors' rights to seek further extensions of this deadline, and (b) granting related relief.

## BASIS FOR RELIEF

### I. Cause Exists to Extend the Time to File the 2015.3 Report.

9. Pursuant to Bankruptcy Rule 2015.3(b), a chapter 11 debtor must file, no later than seven days before the date set for the meeting of creditors under section 341 of the Bankruptcy Code (the "341 Meeting"), and no less than every six (6) months thereafter, periodic financial reports of the value, operations, and profitability of each entity that is not a publicly traded

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the First Day Declaration.

corporation or a debtor in the chapter 11 cases, and in which the estate holds a substantial or controlling interest. *See* Fed. R. Bankr. P. 2015.3(a)–(c).

10. Bankruptcy Rule 9006(b)(1) provides the Court with authority to extend the time to file a 2015.3 Report "for cause." Additionally, Bankruptcy Rule 2015.3(d) provides the Court with the ability, after notice and a hearing, to modify the reporting requirements for cause, including where a debtor is "not able, after a good faith effort, to comply with [the reporting requirements, or where] the required information is publicly available." Fed. R. Bankr. P. 2015.3(d).

11. The Debtors maintain interests in a foreign non-Debtor affiliate that is subject to Bankruptcy Rule 2015.3 and, as such, are required to file a 2015.3 Report. Pursuant to Rule 2015.3, the Debtors' current deadline to file the 2015.3 Report is October 13, 2026 (the "2015.3 Report Deadline"). Currently, the Debtors are not in a position to complete the initial 2015.3 Report prior to the current 2015.3 Report Deadline because, in an effort to keep costs low, the company is working with a limited team of professionals who, at this time, must devote their immediate attention and resources to prepare for the contemplated sale of substantially all of the Debtors' assets, which is expected to close by the end of November. *See* First Day Declaration ¶ 38. Additionally, the Debtors have experienced delays in obtaining information given the foreign nature of the affiliated non-Debtor entity. Accordingly, cause exists to extend the 2015.3 Report Deadline as requested herein.

12. Extending the 2015.3 Report Deadline will enable the Debtors to work with their advisors and the non-debtor subsidiary to finalize updates to and confirm the accuracy of the information to be reported in the 2015.3 Report. Accordingly, the Debtors respectfully request

that the Court grant an extension of 2015.3 Report Deadline to November 30, 2026,[3] pursuant to Bankruptcy Rules 2015.3(d) and 9006(b)(1).

13. Courts in this district have routinely found "cause" to extend the deadline for filing 2015.3 Reports. *See, e.g.*, *In re FlexShopper, Inc.*, No. 25-12254 (LSS) (Bankr. D. Del. Feb. 9, 2026) (extending the time to file Bankruptcy Rule 2015.3 reports to 36 days after petition date, without prejudice to seek further extensions of time); *In re Omega Therapeutics, Inc.*, No. 25-10211 (BLS) (Bankr. D. Del. Mar. 26, 2025) (extending time to file Bankruptcy Rule 2015.3 reports to 58 days after the petition date); *In re Marelli Auto. Lighting USA LLC*, No. 25-11034 (CTG) (Bankr. D. Del. July 16, 2025) (extending the deadline to file Bankruptcy Rule 2015.3 reports through the later of (i) 30 days after the first date scheduled for the meeting of creditors pursuant to section 341 of the Bankruptcy Code, or (ii) 75 days from the petition date); *In re At Home Grp. Inc.*, No. 25-11120 (JKS) (Bankr. D. Del. Jul. 11, 2025) (extending the deadline to file Bankruptcy Rule 2015.3 reports through the later of (i) 30 days after the first date scheduled for the meeting of creditors pursuant to section 341 of the Bankruptcy Code, or (ii) 44 days from the petition date); *In re Liberated Brands, LLC*, No. 25-10168 (JKS) (Bankr. D. Del. Feb. 27, 2025) (extending the deadline to file Bankruptcy Rule 2015.3 reports through the later of (i) 30 days after the first date scheduled for the meeting of creditors pursuant to section 341 of the Bankruptcy Code, or (ii) 44 days from the petition date); *In re Am. Tire Distribs., Inc.*, No. 24-12391 (CTG) (Bankr. D. Del. Nov. 18, 2024) (same); *In re Tupperware Brands Corp.*, No. 24-12156 (BLS) (Bankr. D. Del. Oct. 10, 2024) (extending the deadline to file Bankruptcy Rule 2015.3 reports

[3] Pursuant to Local Rule 9006-2, the filing of this Motion operates to extend the Debtors' 2015.3 Report Deadline until the Court acts on this Motion.

through the later of (i) 30 days after the first date scheduled for the meeting of creditors pursuant to section 341 of the Bankruptcy Code, or (ii) 75 days from the petition date).

14. Accordingly, the Debtors respectfully request entry of the Proposed Order extending the 2015.3 Report Deadline through and including November 30, 2026, without prejudice to the Debtors' rights to seek further extensions of the 2015.3 Report Deadline upon a showing of cause as required by Bankruptcy Rules 2015.3(d) and 9006(b).

## NOTICE

15. The Debtors will provide notice of this Motion to the following parties or their respective counsel: (a) the United States Trustee for the District of Delaware; (b) the United States Attorney's Office for the District of Delaware; (c) the Internal Revenue Service; (d) the offices of the attorneys general in the states in which the Debtors operate; and (e) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

## NO PRIOR REQUEST

16. No prior request for the relief sought in this motion has been made to this or any other court.

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## CONCLUSION

WHEREFORE, the Debtors request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, (a) granting the relief requested herein and (b) granting such other relief as the Court deems appropriate under the circumstances.

Respectfully submitted,

Dated: October 13, 2026
Wilmington, Delaware

**POTTER ANDERSON & CORROON LLP**

*/s/ Katelin A. Morales*
M. Blake Cleary (No. 3614)
Brett M. Haywood (No. 6166)
Katelin A. Morales (No. 6683)
Shannon A. Forshay (No. 7293)
Ethan H. Sulik (No. 7270)
1313 North Market Street, 6th Floor
Wilmington, Delaware 19801
Tel: (302) 984-6000
Facsimile: (302) 658-1192
Email: bcleary@potteranderson.com
bhaywood@potteranderson.com
kmorales@potteranderson.com
sforshay@potteranderson.com
esulik@potteranderson.com

*Proposed Counsel for Debtors and Debtors in Possession*

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

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| In re: | Chapter 11 |
| Yardbird Group LLC, *et al.*,[1] | Case No. 26-11479 (BLS) |
| Debtors. | (Jointly Administered) |
| | **Hearing Date: November 9, 2026 at 10:00 a.m. (ET)**<br>**Objection Deadline: October 27, 2026 at 4:00 p.m. (ET)** |

**NOTICE OF DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) EXTENDING TIME TO FILE 2015.3 FINANCIAL REPORT AND (II) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that the above-captioned debtors and debtors in possession (collectively, the "Debtors"), filed the *Debtors' Motion for Entry of an Order (I) Extending Time to File Rule 2015.3 Financial Report and (II) Granting Related Relief* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

**PLEASE TAKE FURTHER NOTICE** that objections to the Motion, if any, must be in writing, filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801, on or before **October 27, 2026 at 4:00 p.m. (ET)** (the "Objection Deadline"), and served upon and received by the undersigned proposed counsel for the Debtors.

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: Yardbird Group LLC (7139); Southern Operations, LLC (5384); Yardbird Beverly Hills, LLC (9735); Yardbird DFW, LLC (2545); Yardbird DC, LLC (2651); Yardbird Chicago, LLC (6273); Yardbird Denver LLC (8819), YB Las Vegas, LLC (4071), Yardbird DFW Management LLC (8949), Yardbird DFW Concession LLC (1952), and The Bird Singapore LLC (8264). The location of the Debtors' service address in these chapter 11 cases is 3355 Las Vegas Boulevard South, Las Vegas, Nevada 89109.

**PLEASE TAKE FURTHER NOTICE** that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before the Honorable Brendan L. Shannon at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Courtroom No. 1, Wilmington, Delaware 19801 on **November 9, 2026 at 10:00 a.m. (ET).**

**IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING**.

Dated: October 13, 2026
Wilmington, Delaware

**POTTER ANDERSON & CORROON LLP**

*/s/ Katelin A. Morales*

M. Blake Cleary (No. 3614)
Brett M. Haywood (No. 6166)
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1313 North Market Street, 6th Floor
Wilmington, Delaware 19801
Tel: (302) 984-6000
Facsimile: (302) 658-1192
Email: bcleary@potteranderson.com
bhaywood@potteranderson.com
kmorales@potteranderson.com
sforshay@potteranderson.com
esulik@potteranderson.com

*Proposed Counsel for Debtors and Debtors in Possession*

**EXHIBIT A**

**Proposed Order**

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

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|---|---|
| In re: | Chapter 11 |
| Yardbird Group LLC, *et al.*,[1] | Case No. 26-11479 (BLS) |
| Debtors. | (Jointly Administered) |
| | **Re: Docket No. ___** |

**ORDER (I) EXTENDING TIME TO FILE**
**RULE 2015.3 FINANCIAL REPORT AND (II) GRANTING RELATED RELIEF**

Upon the motion (the "Motion")[2] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for the entry of an order (this "Order"), (a) extending the Debtors' time period to file their 2015.3 Report and (b) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declarations; and this Court having 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 February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Debtors having consented to entry of a final order; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: Yardbird Group LLC (7139); Southern Operations, LLC (5384); Yardbird Beverly Hills, LLC (9735); Yardbird DFW, LLC (2545); Yardbird DC, LLC (2651); Yardbird Chicago, LLC (6273); Yardbird Denver LLC (8819), YB Las Vegas, LLC (4071), Yardbird DFW Management LLC (8949), Yardbird DFW Concession LLC (1952), and The Bird Singapore LLC (8264). The location of the Debtors' service address in these chapter 11 cases is 3355 Las Vegas Boulevard South, Las Vegas, Nevada 89109.

[2] Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing, if any, before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT,

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

2. Any objections to the entry of this Order, to the extent not withdrawn or settled, are overruled.

3. The Debtors' 2015.3 Report Deadline is extended through and including November 30, 2026. Such extension is without prejudice to the Debtors' right to seek further extensions.

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

5. Notice of the Motion as provided therein shall be deemed good and sufficient notice of the Motion, and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

6. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

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