IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Yardbird Group LLC, *et al.*,[1]	Case No. 26-11479 (BLS)
Debtors.	(Jointly Administered)
	Re: Docket Nos. 8 & 45

CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS (I) AUTHORIZING THE DEBTORS TO (A) MAINTAIN EXISTING INSURANCE PROGRAMS AND PAY ALL OBLIGATIONS ARISING THEREUNDER AND (B) RENEW, REVISE, EXTEND, SUPPLEMENT, OR ENTER INTO NEW INSURANCE PROGRAMS; (II) AUTHORIZING ALL BANKS TO HONOR PAYMENTS OF INSURANCE OBLIGATIONS; AND (III) GRANTING RELATED RELIEF

The undersigned hereby certifies that on September 21, 2026, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the *Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Programs and Pay All Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter Into New Insurance Programs; (II) Authorizing All Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief* [Docket No. 8] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court"). Attached to the Motion was, among other things, a proposed final form of order approving the relief requested in the Motion (the "Proposed Final Order").

[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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Pursuant to the *Interim Order (I) Authorizing the Debtors to (A) Maintain Existing Insurance Programs and Pay All Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter Into New Insurance Programs; (II) Authorizing All Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief* [Docket No. 45], entered on September 22, 2026 (the "Interim Order") and the *Omnibus Notice of Second Day Hearing to Be Held on October 20, 2026 at 10:00 a.m. (ET)* [Docket No. 51] filed on September 22, 2026, any objection or response to the final relief requested in the Motion was to be filed and served so as to be received by no later than October 13, 2026 at 4:00 p.m. (ET) (the "Objection Deadline").

The undersigned further certifies that as of the Objection Deadline, no answer, objection, or other responsive pleading to the Motion was received by the Debtors or has appeared on the Court's docket in this case.

WHEREFORE, the Debtors respectfully request that the Proposed Final Order, attached to the Motion as Exhibit B, be entered at the earliest convenience of the Court.

[Signature Page Follows]

Dated: October 14, 2026
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

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Proposed Counsel for Debtors and Debtors in Possession