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. 11 & 48

CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS (I) AUTHORIZING MAINTENANCE, ADMINISTRATION, AND CONTINUATION OF DEBTORS' CUSTOMER PROGRAMS AND (II) GRANTING RELATED RELIEF

The undersigned hereby certifies as follows:

1. The undersigned hereby certifies that on September 21, 2026, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Maintenance, Administration, and Continuation of Debtors' Customer Programs and (II) Granting Related Relief* [Docket No. 11] (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").

2. Pursuant to the *Interim Order (I) Authorizing Maintenance, Administration, and Continuation of Debtors' Customer Programs and (II) Granting Related Relief* [Docket No. 48], 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

[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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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").

3. Prior to the Objection Deadline, the Debtors received an informal response (the "Informal Response") from the Office of the United States Trustee (the "U.S. Trustee"). Other than the Informal Response, the Debtors received no other responses to the Motion and no objections or responses have been filed on the docket in these cases. The Informal Response has been resolved by revisions to the Proposed Final Order, and such revised order is attached hereto as **Exhibit A** (the "Revised Final Order"). The Revised Final Order has been circulated to the U.S. Trustee, who does not object to its entry. For the convenience of the Court and all parties in interest, a blackline of the Revised Final Order against the Proposed Final Order is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors respectfully request that the Revised Final Order, attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

[Signature Page Follows]

Dated: October 14, 2026
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

/s/ Katelin A. Morales

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Proposed Counsel for Debtors and Debtors in Possession

EXHIBIT A

Revised Final Order

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. 11 & 48

FINAL ORDER (I) AUTHORIZING MAINTENANCE, ADMINISTRATION, AND CONTINUATION OF CERTAIN OF DEBTORS' CUSTOMER PROGRAMS AND (II) GRANTING RELATED RELIEF

Upon the motion (the "Motion")[2] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Final Order"), (i) authorizing, but not directing, the Debtors to maintain and administer certain customer programs in the ordinary course of business and in a manner consistent with past practice as described herein (collectively, the "Customer Programs"), (ii) authorizing, but not directing, the Debtors to continue, replace, implement, modify, and/or terminate one or more of the Customer Programs, in each case as the Debtors deem appropriate in their business judgment and in the ordinary course of business, without further Court order, and (iii) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over 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 February 29, 2012, and that

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

this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of these cases is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein and that such relief is in the best interests of the Debtors, their estates, their creditors and all parties in interest; and upon all of the proceedings had before the Court after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT,

1. The Motion is GRANTED on a final basis as set forth herein.

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

3. The Debtors are authorized, in their business judgment and reasonable discretion, to continue to honor and maintain their Customer Programs, in the ordinary course of business and in a manner consistent with past practice. The Debtors are authorized to honor all obligations arising under or in connection with the Customer Programs attributable to the prepetition period, *provided that*, if the Debtors at any time during these Chapter 11 Cases cease to honor their Customer Programs, they shall file a notice of the same with the Court, and serve such notice on the Office of the U.S. Trustee; the United States Attorney's Office for the District of Delaware; the Attorney General for the States of Texas, Illinois, and Nevada and the District of Washington, D.C.; any official committee appointed in these Chapter 11 Cases; and any party filing a request for service under Bankruptcy Rule 2002. The Debtors shall not continue, replace, implement,

modify, and/or terminate one or more of the Customer Programs without the prior written consent of the Prepetition Secured Parties and the DIP Secured Parties.

4. Nothing contained herein is or should be construed as: (i) an implication or admission as to the validity of any claim against the Debtors, (ii) a waiver of the Debtors' or any other party in interest's rights to dispute the amount of, basis for, or validity of any claim against the Debtors, (iii) a waiver of any claims or causes of action that may exist against any creditor or interest holder, (iv) a promise to pay any claim, (v) a concession by the Debtors that any liens (contractual, common law, statutory or otherwise) satisfied pursuant to this Final Order are valid (and all rights to contest the extent, validity or perfection or seek avoidance of all such liens are expressly reserved), (vi) an approval, assumption, adoption, or rejection of any agreement, contract, program, policy, or lease between the Debtors and any third party under section 365 of the Bankruptcy Code, (vii) a waiver of the obligation of any party in interest to file a proof of claim, or (viii) otherwise affecting the Debtors' rights under section 365 of the Bankruptcy Code to assume or reject any executory contract or unexpired lease. Any payment made pursuant to this Final Order is not intended to be and should not be construed as an admission to the validity of any claim or a waiver of the Debtors' rights to subsequently dispute such claim.

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

6. This Final Order shall be immediately effective and enforceable upon its entry. The fourteen-day stay imposed by Bankruptcy Rule 6004(h) is hereby waived.

7. The Debtors are authorized to take all actions necessary to implement the relief granted in this Final Order.

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

EXHIBIT B

Blackline

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. 11 & ~~—~~48

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February 29, 2012, 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 these cases is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein and that such relief is in the best interests of the Debtors, their estates, their creditors and all parties in interest; and upon all of the proceedings had before the Court after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT,

1. The Motion is GRANTED on a final basis as set forth herein.

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

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replace, implement, modify, and/or terminate one or more of the Customer Programs without the prior written consent of the Prepetition Secured Parties and the DIP Secured Parties.

4. Nothing contained herein is or should be construed as: (i) an implication or admission as to the validity of any claim against the Debtors, (ii) a waiver of the Debtors' or any other party in interest's rights to dispute the amount of, basis for, or validity of any claim against the Debtors, (iii) a waiver of any claims or causes of action that may exist against any creditor or interest holder, (iv) a promise to pay any claim, (v) a concession by the Debtors that any liens (contractual, common law, statutory or otherwise) satisfied pursuant to this Final Order are valid (and all rights to contest the extent, validity or perfection or seek avoidance of all such liens are expressly reserved), (vi) an approval, assumption, adoption, or rejection of any agreement, contract, program, policy, or lease between the Debtors and any third party under section 365 of the Bankruptcy Code, (vii) a waiver of the obligation of any party in interest to file a proof of claim, or (viii) otherwise affecting the Debtors' rights under section 365 of the Bankruptcy Code to assume or reject any executory contract or unexpired lease. Any payment made pursuant to this Final Order is not intended to be and should not be construed as an admission to the validity of any claim or a waiver of the Debtors' rights to subsequently dispute such claim.

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