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)
	Ref. Docket No. 29

CERTIFICATION OF COUNSEL REGARDING DEBTORS' FIRST MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO REJECT CERTAIN UNEXPIRED LEASES AND EXECUTORY CONTRACTS EFFECTIVE AS OF THE PETITION DATE; (II) ABANDONING ANY REMAINING PERSONAL PROPERTY LOCATED AT THE LEASED PREMISES; AND (III) GRANTING RELATED RELIEF

The undersigned hereby certifies as follows:

1. On September 21, 2026, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the *Debtors' First Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Unexpired Leases and Executory Contracts Effective as of the Petition Date; (II) Abandoning any Remaining Personal Property Located at the Leased Premises; and (III) Granting Related Relief* [Docket No. 29] (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 form of order approving the relief requested in the Motion (the "Proposed 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

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2. Pursuant to the the Motion, any objections or responses to the relief requested in the Motion was to be filed and served so as to be received by October 5, 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 of these cases. The Informal Response has been resolved by revisions to the Proposed Order, and such revised order is attached hereto as **Exhibit A** (the "Revised Order"). The Revised Order has been circulated to the Office of the United States Trustee, who does not object to its entry. For the convenience of the Court and all parties in interest, a blackline of the Revised Order against the Proposed Order is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors respectfully request that the Revised 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 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 No. 29

ORDER (I) AUTHORIZING THE DEBTORS TO REJECT CERTAIN UNEXPIRED LEASES AND EXECUTORY CONTRACTS EFFECTIVE AS OF THE PETITION DATE; (II) ABANDONING ANY REMAINING PERSONAL PROPERTY LOCATED AT THE LEASED PREMISES; AND (III) 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 (i) authorizing the Debtors to reject certain Leases and Contracts, effective as of the Petition Date; (ii) authorizing the Debtors to abandon any Personal Property remaining at the Premises, effective as of the Petition Date; 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 this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) 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 Chapter 11

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

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 as set forth herein.

2. Pursuant to sections 105(a) and 365(a) of the Bankruptcy Code, the Leases listed on **Exhibit 1** attached hereto and the Contracts listed on **Exhibit 2** attached hereto, including, to the extent applicable, any agreements, amendments, change orders, supplements, waivers, subleases, and side letters related thereto, are hereby rejected by the Debtors effective as of the Petition Date.

3. Pursuant to sections 105(a) and 554(a) of the Bankruptcy Code and Bankruptcy Rule 6007, the interests of the Debtors and their estates in any Personal Property remaining on the Premises are deemed abandoned by the Debtors and their estates as of the Petition Date. For the avoidance of doubt, the Debtors shall not abandon Personal Property against which the Debtors know that a third party has asserted a lien, other than the Prepetition Secured Parties and DIP Secured Parties, without providing notice to such third party. The Landlords may use or dispose of the Personal Property in their sole and absolute discretion without notice or liability to the Debtors or their estate, subject to the liens of interests of any third parties in the Personal Property under applicable law. The rights, claims, and remedies, if any, of all persons, including the

Landlords, other than the Debtors and their estates with respect to the abandoned Personal Property under applicable non-bankruptcy law are hereby preserved.

4. Nothing herein shall impair, prejudice, waive or otherwise affect the rights of the Debtors to: (a) assert that the Leases and Contracts (i) were terminated on or prior to the Petition Date, or (ii) are not an executory contract or unexpired lease under 365 of the Bankruptcy Code; (b) assert that any claim for damages arising from the rejection of the Leases and Contracts is limited to the remedies available under any applicable termination provisions of the Leases and Contracts; (c) assert that any such claim is an obligation of a third party, and not that of the Debtors or their estates; or (d) otherwise contest any claims that may be asserted in connection with the Leases and Contracts. All rights, claims, defenses and causes of action that the Debtors and their estates may have against the Landlords and Counterparties, whether or not such claims arise under, are related to the rejection of, or are independent of the Leases and Contracts, are reserved, and nothing herein is intended or shall be deemed to impair, prejudice, waive or otherwise such rights, claims, defenses and causes of action.

5. The Debtors are hereby authorized to execute and deliver all instruments and documents, and take such other actions as may be necessary or appropriate, to implement and effectuate this Order.

6. Other than as expressly sought herein, 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) 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, (vi) a waiver of the obligation of any party in interest to file a proof of claim, or (vii) otherwise affecting the Debtors' rights under section 365 of the Bankruptcy Code to assume or reject any executory contract or unexpired lease.

7. Notwithstanding Bankruptcy Rule 6004(h), this Order shall be effective and enforceable immediately upon entry hereof.

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

Exhibit 1

Rejected Leases

No.	Debtor	Lease Counterparty	Contract	Location of Leased Property	Rejection Date
1	Southern Operations, LLC	1600 Lenox LLC	Real Property Lease	1600 Lenox Avenue, Miami Beach, Florida 33139	September 21, 2026
2	Yardbird Beverly Hills, LLC	La Cienega Partners LP	Real Property Lease	8500 Beverly Boulevard Suite 112 Los Angeles, California 90048	September 21, 2026
3	Yardbird Denver LLC	Lot 28 Owner LLC	Real Property Lease	2743 Blake Street Denver, Colorado 80205	September 21, 2026

Exhibit 2

Rejected Contracts

No.	Debtor	Contract Counterparty	Description of Contract	Rejection Date
1	Yardbird Beverly Hills, LLC	Toast, Inc.	Billing Software and Hardware	September 21, 2026
2	Southern Operations, LLC	Toast, Inc.	Billing Software and Hardware	September 21, 2026
3	Yardbird Denver, LLC	Toast, Inc.	Billing Software and Hardware	September 21, 2026

EXHIBIT B

Blackline

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FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
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Debtors.	(~~Joint Administration Requested~~Jointly Administered)
	Re: Docket No. ~~—~~29

ORDER (I) AUTHORIZING THE DEBTORS TO REJECT CERTAIN UNEXPIRED LEASES AND EXECUTORY CONTRACTS EFFECTIVE AS OF THE PETITION DATE; (II) ABANDONING ANY REMAINING PERSONAL PROPERTY LOCATED AT THE LEASED PREMISES; AND (III) GRANTING RELATED RELIEF

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that venue of these Chapter 11 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,

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