

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

|  |   |                                      |
|--|---|--------------------------------------|
| In re:   | ) |                                      |
|  | ) | Chapter 11                           |
|  | ) |                                      |
| PES Administrative Services, LLC, <sup>1</sup> | ) | Case No. 19-11629 (LSS)              |
|  | ) |                                      |
| Reorganized Debtor.                            | ) | (Jointly Administered)               |
|  | ) | (Formerly Jointly Administered under |
|  | ) | Lead Case: PES Holdings, LLC, Case   |
|  | ) | No. 19-11626)                        |

**SIXTH JOINT MOTION OF THE PES LIQUIDATING TRUST AND  
GUC CLAIMS ADMINISTRATOR FOR ENTRY OF AN ORDER EXTENDING  
THE DEADLINE TO FILE AND SERVE OBJECTIONS TO CLAIMS OR INTERESTS**

The PES Liquidating Trust (the “Liquidating Trust”)<sup>2</sup> and the GUC Claims Administrator (the “GUC Administrator,” and with the Liquidating Trust, the “Movants”)<sup>3</sup> file this motion (this “Motion”) requesting entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Order”), extending the deadline by which the Movants must file and serve objections to Claims or Interests by 120 days, through and including December 15, 2022. In support thereof, the Movants respectfully submit as follows.<sup>4</sup>

<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: PES Holdings, LLC; North Yard GP, LLC; North Yard Logistics, L.P.; PES Administrative Services, LLC (3022); PES Energy Inc.; PES Intermediate, LLC; PES Ultimate Holdings, LLC; and Philadelphia Energy Solutions Refining and Marketing LLC. On March 28, 2022, the Court entered an order [Docket No. 1900] closing the chapter 11 cases of the Reorganized Debtors other than Case No. 19-11629 (LSS), *PES Administrative Services, LLC*.

<sup>2</sup> The Liquidating Trust is a trust created pursuant to the Debtors' Plan, as defined herein. The Liquidating Trust is responsible for and has the authority to administer certain post-confirmation responsibilities under the Plan on behalf of the Reorganized Debtors.

3 The GUC Administrator was established and selected pursuant to the Debtors' Plan, as defined herein. The GUC Administrator is responsible for and has the authority to, *inter alia*, file, prosecute, and settle objections to general unsecured claims, as well as make distributions on allowed general unsecured claims.

<sup>4</sup> Capitalized terms used but not otherwise defined herein shall have the same meanings given to such terms in the *Fourth Amended Joint Chapter 11 Plan of PES Holdings, LLC and Its Debtor Affiliates* [D.I. 994] (the “Plan”).

### **Jurisdiction and Venue**

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has 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 (the “Amended Standing Order”). This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b).

2. The Movants confirm their consent pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

### **Relief Requested**

4. By this Motion, the Movants request entry of an order extending the deadline by which the Movants must file and serve objections to Claims or Interests (the “Claims Objection Bar Date”) by 120 days, through and including December 15, 2022, without prejudice to the right of the Movants to request further extensions of time to file and serve objections to Claims and Interests.

### **Background**

5. On the Petition Date, each of the Debtors filed a petition with the Court under chapter 11 of the Bankruptcy Code. These chapter 11 cases are procedurally consolidated and jointly administered pursuant to Bankruptcy Rule 1015(b). No party has requested the appointment of a trustee or examiner in these chapter 11 cases. On August 5, 2019, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an official committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the “Committee”)

[D.I. 152]. On March 28, 2022, the Court entered an order [D.I. 1900] closing the chapter 11 cases of the Reorganized Debtors other than the case of PES Administrative Services, LLC (Case No. 19-11629).

## **I. Claims Administration Process.**

6. On September 6, 2019, the Debtors filed their schedules of assets and liabilities (the “Schedules”) and statements of financial affairs (the “Statements” and together, with the Schedules, the “Schedules and Statements”) [D.I.s 308-323]. On October 14, 2019, the Debtors filed amended Schedules and Statements [D.I.s 473-474], addressing certain discrete issues.

7. On August 20, 2019, the Court established October 21, 2019, at 5:00 p.m. (prevailing Eastern Time), as the final date and time for all persons and entities holding or asserting a prepetition, non-governmental claim or interest against the Debtors arising on or before the Petition Date to file proofs of claim in these chapter 11 cases (the “General Claims Bar Date”).<sup>5</sup>

8. The Liquidating Trust has already objected to, settled, made initial distributions on account of, or otherwise resolved approximately 268 Proofs of Claim, leaving approximately 37 disputed or unresolved Proofs of Claim pending resolution by the Liquidating Trust<sup>6</sup> (the “Remaining Claims”).

9. The GUC Administrator has already objected to, settled, or otherwise resolved approximately 175 Proofs of Claim, leaving multiple Remaining Claims, including several rejection damage and related post-confirmation claims that have been analyzed and are pending

---

<sup>5</sup> *Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment under Section 503(b)(9), (II) Setting a Bar Date for the Filing of Proofs of Claim by Governmental Units, (III) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date (IV) Approving the Form and Manner for Filing Proofs of Claim, (V) Approving Notice of Bar Dates, and (VI) Granting Related Relief* [D.I. 218].

<sup>6</sup> Pursuant to the Plan, the GUC Administrator is responsible for the resolution of General Unsecured Claims, which are not included in this calculation.

resolution. The Liquidating Trust and the GUC Administrator have been working cooperatively on these collective efforts.

## **II. Confirmation and Effective Dates.**

10. On February 13, 2020, the Court entered an order confirming the Plan.<sup>7</sup> The Effective Date occurred on June 26, 2020.<sup>8</sup>

11. Pursuant to Article I.A.23 of the Plan, the Movants and other parties in interest had until December 23, 2020 to object to Claims against or Interests in the Debtors. However, the Plan contemplates that the Claims Objection Bar Date may be extended upon a motion filed before the expiration of the deadline to object to Claims or Interests. *See* Plan, Art. I.A.23. Accordingly, on January 4, 2021, the Court entered the *Order Granting the Motion of the PES Liquidating Trust for Entry of an Order Extending the Deadline to File and Serve Objections to Claims or Interests* [D.I. 1628] and on January 26, 2021 entered the *Order Granting the Motion of the GUC Claims Administrator for Order Under Bankruptcy Code Section 105(a) and Bankruptcy Rule 9006 Further Extending Time to Object to Claims* [D.I. 1651], extending the original Claims Objection Bar Date through and including April 22, 2021 for both Movants. On April 28, 2021, the Court entered the *Order Granting the Joint Second Motion of the PES Liquidating Trust and the GUC Claims Administrator for Entry of an Order Extending the Deadline to File and Serve Objections to Claims or Interests* [D.I. 1681], extending the Claims Objection Bar Date through and including August 20, 2021. On August 17, 2021, the Court entered the *Order Granting the Joint Third Motion of the PES Liquidating Trust and the GUC Claims Administrator for Entry of an Order*

---

<sup>7</sup> *See Order Confirming the Fourth Amended Joint Chapter 11 Plan of PES Holdings, LLC and Its Debtor Affiliates* [D.I. 1004].

<sup>8</sup> *See Notice of (I) Entry of Order Confirming the Fourth Amended Joint Chapter 11 Plan of Reorganization of PES Holdings, LLC and Its Debtors Affiliates and (II) Occurrence of the Effective Date* [D.I. 1376].

*Extending the Deadline to File and Serve Objections to Claims or Interests* [D.I. 1731], extending the Claims Objection Bar Date through and including December 20, 2021. On January 6, 2022, the Court entered the *Order Granting the Joint Fourth Motion of the PES Liquidating Trust and the GUC Claims Administrator for Entry of an Order Extending the Deadline to File and Serve Objections to Claims or Interests* [D.I. 1857], extending the Claims Objection Bar Date through and including April 19, 2022. On May 10, 2022, the Court entered the *Order Granting the Joint Fifth Motion of the PES Liquidating Trust and the GUC Claims Administrator for Entry of an Order Extending the Deadline to File and Serve Objections to Claims or Interests* [D.I. 29, Case No. 19-11629], extending the Claims Objection Bar Date through and including August 17, 2022 (the “Fifth Extended Claims Objection Bar Date”).

12. By this Motion, the Movants jointly request entry of an order extending the Claims Objection Bar Date to December 15, 2022 as to the Movants and all other parties in interest.

### **Basis for Relief**

13. Bankruptcy Rule 9006(b)(1) permits bankruptcy courts to extend deadlines for “cause shown,” providing, in relevant part, that:

when an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion (1) with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order . . . .

Fed. R. Bankr. P. 9006(b)(1). Moreover, section 105(a) of the Bankruptcy Code provides that the Court may issue any order that is necessary or appropriate to carry out the provisions of the Bankruptcy Code. 11 U.S.C. § 105(a).

14. To date, the Movants and their professionals, in consultation with each other, have analyzed and resolved the vast majority of Claims against the Debtors.<sup>9</sup> While the Movants are nearing final resolution with respect to the additional number of Claims remaining in these chapter 11 cases, the Movants will likely not complete this process before the Fifth Extended Claims Objection Bar Date.

15. Accordingly, the Movants request an extension of the Claims Objection Bar Date by 120 days, through and including December 15, 2022, to provide sufficient time in which to complete the review, analysis, and resolution of the Remaining Claims. Although the Movants are optimistic that they will be able to consensually resolve many, if not all, of the Remaining Claims, this additional time is necessary to ensure that the Movants are able to preserve value for creditors by preparing and filing additional objections, if appropriate. The Movants hope that the requested extension will facilitate consensual resolution of complex claims by means of discussion and negotiation, while a shorter deadline would likely require the filing of objections, with the attendant cost in time and legal expenses.

16. For these reasons, the Movants respectfully submit that an extension of the Fifth Extended Claims Objection Bar Date by 120 days, through and including December 15, 2022, is authorized under the terms of the Plan and should be granted.

### Notice

17. The Movants will provide notice of this Objection to: (a) the U.S. Trustee; (b) the Committee; (c) the administrative agent under the Debtors' prepetition first lien term loan facility and counsel thereto; (d) the lenders under the Debtors' prepetition first lien term loan

---

<sup>9</sup> See, e.g., *Order Sustaining Liquidating Trust's First Omnibus (Non-Substantive) Objection to Certain (I) Late Filed Claims and (II) No Liability Claims* [D.I. No. 1464]; *Order Sustaining the Liquidating Trust's Second Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Sections 502(b) and 503(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1* [D.I. 1523].

facility and counsel thereto; (e) Merrill Lynch Commodities, Inc. and counsel thereto; (f) NGL Energy Partners LP and counsel thereto; (g) the lenders under the Debtors' prepetition promissory note and counsel thereto; (h) counsel to ICBC Standard Bank Plc; (i) the lenders under the Debtors' debtor-in-possession financing facility and counsel thereto; (j) the United States Attorney's Office for the District of Delaware; (k) the Internal Revenue Service; (l) the state attorneys general for all states in which the Debtors conduct business; and (m) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Movants submit that, in light of the nature of the relief requested, no other or further notice need be given.

*[Remainder of this page intentionally left blank.]*

WHEREFORE, the Movants respectfully request that the Court enter the Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested in this Motion and granting such other and further relief as is appropriate under the circumstances.



Dated: August 2, 2022  
Wilmington, Delaware

*/s/ Peter J. Keane*

---

Laura Davis Jones (DE Bar No. 2436)  
James E. O'Neill (DE Bar No. 4042)  
Peter J. Keane (DE Bar No. 5503)  
**PACHULSKI STANG ZIEHL & JONES LLP**  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
  
Email: ljones@pszjlaw.com  
pkeane@pszjlaw.com  
joneill@pszjlaw.com

- and -

Edward O. Sassower, P.C.  
Steven N. Serajeddini (admitted *pro hac vice*)  
Matthew C. Fagen (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: edward.sassower@kirkland.com  
steven.serajeddini@kirkland.com  
matthew.fagen@kirkland.com

*Co-Counsel to the PES Liquidating Trust*

- and -

Cheneise Wright (DE Bar No. 6597)  
**Lewis Brisbois Bisgaard & Smith LLP**  
500 Delaware Avenue, Suite 700  
Wilmington, Delaware 19801  
Telephone: (302) 985-6007  
Email: Cheneise.Wright@lewisbrisbois.com

*Counsel to the GUC Claims Administrator*

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

|  |   |                                      |
|--|---|--------------------------------------|
| In re:   | ) |                                      |
|  | ) | Chapter 11                           |
|  | ) |                                      |
| PES Administrative Services, LLC, <sup>1</sup> | ) | Case No. 19-11629 (LSS)              |
|  | ) |                                      |
| Reorganized Debtor.                            | ) | (Jointly Administered)               |
|  | ) | (Formerly Jointly Administered under |
|  | ) | Lead Case: PES Holdings, LLC, Case   |
|  | ) | No. 19-11626)                        |

Hearing Date: September 9, 2022 at 10:00 a.m. (ET)  
Objection Deadline: August 16, 2022 at 4:00 p.m. (ET)

**NOTICE OF HEARING ON SIXTH JOINT MOTION OF THE PES LIQUIDATING  
TRUST AND GUC CLAIMS ADMINISTRATOR FOR ENTRY OF AN ORDER  
EXTENDING THE DEADLINE TO FILE AND SERVE  
OBJECTIONS TO CLAIMS OR INTERESTS**

PLEASE TAKE NOTICE that on August 2, 2022, the PES Liquidating Trust (the “Liquidating Trust”)<sup>2</sup> and the GUC Claims Administrator (the “GUC Administrator”, and with the Liquidating Trust, the “Movants”)<sup>3</sup> filed the attached *Sixth Joint Motion of the PES Liquidating Trust and GUC Claims Administrator for Entry of an Order Extending the Deadline to File and Serve Objections to Claims or Interests* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”).

<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor’s federal tax identification number, are: PES Holdings, LLC; North Yard GP, LLC; North Yard Logistics, L.P.; PES Administrative Services, LLC (3022); PES Energy Inc.; PES Intermediate, LLC; PES Ultimate Holdings, LLC; and Philadelphia Energy Solutions Refining and Marketing LLC. On March 28, 2022, the Court entered an order [Docket No. 1900] closing the chapter 11 cases of the Reorganized Debtors other than Case No. 19-11629 (LSS), *PES Administrative Services, LLC*.

<sup>2</sup> The Liquidating Trust is a trust created pursuant to the Debtors’ Plan, as defined herein. The Liquidating Trust is responsible for and has the authority to administer certain post-confirmation responsibilities under the Plan on behalf of the Reorganized Debtors.

<sup>3</sup> The GUC Administrator was established and selected pursuant to the Debtors’ Plan, as defined herein. The GUC Administrator is responsible for and has the authority to, *inter alia*, file, prosecute, and settle objections to general unsecured claims, as well as make distributions on allowed general unsecured claims.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the entry of the order with respect to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **August 16, 2022 at 4:00 p.m. Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (a) counsel to the Liquidating Trust; (i) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn: Edward O. Sassower, P.C., Steven N. Serajeddini, and Matthew C. Fagen; and (ii) co-counsel to the Liquidating Trust Board, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705 (Courier 19801), Attn: Laura Davis Jones; (b) counsel to the DIP Lenders, (i) Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn: Damian S. Schaible and Aryeh E. Falk, and (ii) Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, 16th Floor, P.O. Box 1347, Wilmington, Delaware 19899-1347, Attn: Robert J. Dehney and Andrew R. Remming; (c) counsel to ICBC Standard Bank Plc, (i) Hayes and Boone LLP, 2323 Victory Avenue, Suite 700, Dallas, Texas 75219, Attn: J. Frasher Murphy and Charles M. Jones II, and (ii) Reed Smith LLP, 1201 N. Market Street, Suite 1500, Wilmington, Delaware 19801, Attn: Kurt F. Gwynne; (d) counsel to the GUC Claims Administrator, Elliott Greenleaf, PC, 1105 Market Street, Suite 1700, Wilmington, Delaware 19801, Attn: Shelley A. Kinsella and Jonathan M. Stemerman; and (e) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: David L. Buchbinder.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION WILL BE HELD ON **SEPTEMBER 9, 2022 AT 10:00 A.M. EASTERN TIME** BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.**

Dated: August 2, 2022  
Wilmington, Delaware

/s/ Peter J. Keane

---

Laura Davis Jones (DE Bar No. 2436)  
James E. O'Neill (DE Bar No. 4042)  
Peter J. Keane (DE Bar No. 5503)  
**PACHULSKI STANG ZIEHL & JONES LLP**  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
  
Email: ljones@pszjlaw.com  
pkeane@pszjlaw.com  
joneill@pszjlaw.com

- and -

Edward O. Sassower, P.C.  
Steven N. Serajeddini (admitted *pro hac vice*)  
Matthew C. Fagen (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: edward.sassower@kirkland.com  
steven.serajeddini@kirkland.com  
matthew.fagen@kirkland.com

*Co-Counsel to the PES Liquidating Trust*

**EXHIBIT A**

**Proposed Order**

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

In re:

PES Administrative Services, LLC,<sup>1</sup>

### Reorganized Debtor.

Chapter 11

Case No. 19-11629 (LSS)

(Jointly Administered)

(Formerly Jointly Administered under

## Lead Case: PES Holdings, LLC, Case

No. 19-11626)

**ORDER GRANTING THE JOINT SIXTH MOTION OF  
THE PES LIQUIDATING TRUST AND THE GUC CLAIMS  
ADMINISTRATOR FOR ENTRY OF AN ORDER EXTENDING THE  
DEADLINE TO FILE AND SERVE OBJECTIONS TO CLAIMS OR INTERESTS**

Upon the motion (the “Motion”)<sup>2</sup> of the Liquidating Trust and the GUC Administrator for entry of an order (this “Order”): (a) extending the deadline by which the Movants must file and serve objections to Claims or Interests in the Debtors by 120 days, through and including December 15, 2022; and (b) granting related relief; and the Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of these cases and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the 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 the Court having found that the Movants provided appropriate notice of the Motion and the opportunity for a hearing on the

<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: PES Holdings, LLC; North Yard GP, LLC; North Yard Logistics, L.P.; PES Administrative Services, LLC (3022); PES Energy Inc.; PES Intermediate, LLC; PES Ultimate Holdings, LLC; and Philadelphia Energy Solutions Refining and Marketing LLC. On March 28, 2022, the Court entered an order [Docket No.1900] closing the chapter 11 cases of the Reorganized Debtors other than Case No. 19-11629 (LSS), *PES Administrative Services, LLC*.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Motion under the circumstances; and the Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing, if any, before the Court (the “Hearing”); and the 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 the 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. The Claims Objection Bar Date is extended through and including December 15, 2022 as to the Movants and all other parties in interest.
3. This Order shall be subject to and without prejudice to the rights of any party to request further extensions of time to file and serve objections to Claims and Interests pursuant to the terms of the Plan.
4. Notice of the Motion as provided therein shall be deemed good and sufficient and the requirements of the Local Rules are satisfied by such notice.
5. Notwithstanding the possible applicability of Bankruptcy Rules 6004(h), 7062, 9014 or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
6. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

7. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: \_\_\_\_\_, 2022  
Wilmington, Delaware

---

THE HONORABLE LAURIE S. SILVERSTEIN  
UNITED STATES BANKRUPTCY JUDGE