

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

In re

The Aldo Group Inc., et al.,<sup>1</sup>

Debtors in Foreign Proceedings.

Chapter 15

Case No. 20-11060 (KBO)

**RE: D.I. 101**

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF THE FOREIGN  
REPRESENTATIVE TO FILE UNDER SEAL CONFIDENTIAL EXHIBITS TO THE  
MOTION FOR ENTRY OF AN ORDER GIVING EFFECT TO ORDER ENTERED IN  
THE FOREIGN PROCEEDINGS TO (A) DISMISS FOREIGN PROCEEDING AS TO  
ALDO 1125 THIRD AVENUE CORPORATION AND ALDO 250 WEST 125 INC., (B)  
REDUCE INTERIM CREDIT FACILITY, (C) AUTHORIZE KEY EMPLOYEE  
RETENTION PLAN AND RELATED CHARGE ON ASSETS AND (D) GRANTING  
RELATED RELIEF**

The undersigned hereby certifies that, as of the date hereof, Morris, Nichols, Arsht & Tunnell LLP (“Morris Nichols”) has received no answer, objection or other responsive pleading to the *Motion of the Foreign Representative to File Under Seal Confidential Exhibits to the Motion for Entry of an Order Giving Effect to Order Entered in the Foreign Proceedings to (A) Dismiss Foreign Proceeding as to Aldo 1125 Third Avenue Corporation and Aldo 250 West 125 Inc., (B) Reduce Interim Credit Facility, (C) Authorize Key Employee Retention Plan and Related Charge on Assets and (D) Granting Related Relief* [D.I. 101] (the “Motion”), filed on July 20, 2021.

The undersigned further certifies that Morris Nichols has caused the review of the Court’s docket in these cases and that no answer, objection or other responsive pleading to the

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<sup>1</sup> The Debtors in these Chapter 15 Cases and the last four digits of their U.S. Federal Employer Identification Numbers or other unique identifier are as follows: The Aldo Group Inc. (2186); Southwest Capital Holdings Inc. (8248); Aldo US Inc. (6704); Aldo Marketing LLC (1748); Aldo Shoes West Forty Second, LLC (2610); Aldo 1125 Third Ave. Corp. (2110); Aldo 5th Ave. Inc. (2112); Aldo 250 West 125 Inc. (2324); and 1230 Avenue of the Americas LLC (6704). The Debtors’ principal offices are located at 905 Hodge Street Montreal QC, Canada, H4N 2B3.

Motion appears thereon. Pursuant to the notice of Motion, objections to the Motion were to be filed and served no later than August 3, 2021, at 4:00 p.m. (ET) (the “Objection Deadline”).

WHEREFORE, the Foreign Representative respectfully requests that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: August 4, 2021  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Paige N. Topper

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