IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	Chapter 11
	§	
CBL & ASSOCIATES	§	
PROPERTIES, INC., et al.,	§	Case No. 20- 35226 (DRJ)
	§	
Debtors. ¹	§	(Jointly Administered)
	§	Re: Docket No. 1332

CERTIFICATE OF NO OBJECTION TO JOINT MOTION OF DEBTOR LAREDO OUTLET SHOPPES, LLC AND U.S. BANK FOR ENTRY OF AN ORDER APPROVING (I) SETTLEMENT AGREEMENT AND (II) AGREED DISMISSAL OF CHAPTER 11 CASE

- 1. On July 26, 2021, Laredo Outlet Shoppes, LLC ("Laredo" or the "Debtor") and U.S. Bank National Association ("U.S. Bank," and together with Laredo, the "Movants"), filed the *Joint Motion of Debtor Laredo Outlet Shoppes, LLC and U.S. Bank for Entry of an Order Approving (I) Settlement Agreement and (II) Agreed Dismissal of Chapter 11 Case* (Docket No. 1332) (the "Motion"),² with a proposed order granting the relief requested in the Motion attached thereto as Exhibit A (the "Initial Proposed Order"). Objections to the Motion were required to be filed and served on or prior to August 16, 2021 (the "Objection Deadline").
- 2. In accordance with paragraph 44 of the *Procedures for Complex Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) the Objection Deadline has passed, (ii) the undersigned counsel is unaware of any objection to the Motion, and (iii) the undersigned counsel has reviewed the Court's docket and no objection to the Motion appears thereon.

A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at https://dm.epiq11.com/CBLProperties. The Debtors' service address for the purposes of these chapter 11 cases is 2030 Hamilton Place Blvd., Suite 500, Chattanooga, Tennessee 37421.

² Capitalized terms used by not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

3. The Debtor received informal comments to the Initial Proposed Order from the U.S. Trustee. The amended proposed order, attached hereto as **Exhibit A** (the "**Proposed Order**") resolves the U.S. Trustee's comments. A redline of the Proposed Order against the Initial Proposed Order is attached hereto as **Exhibit B**.

Dated: August 18, 2021 Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

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-and-

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Attorneys for Debtors and Debtors in Possession

Certificate of Service

I hereby certify that on August 18, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez