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

In re:	) Chapter 11
ENERGY FUTURE HOLDINGS CORP., et al., 1	) Case No. 14-10979 (CSS)
Debtors.	) (Jointly Administered)
	) Re: D.I. 14335

CERTIFICATION OF NO OBJECTION REGARDING THE "MOTION OF THE EFH PLAN ADMINISTRATOR BOARD FOR ENTRY OF AN ORDER APPROVING THE SETTLEMENT AGREEMENT BETWEEN ELLIOTT, UMB BANK, N.A., NEXTERA, AND THE EFH PLAN ADMINISTRATOR BOARD" [D.I. 14335]

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection, or any other responsive pleading to the *Motion of the EFH Plan Administrator Board* for Entry of an Order Approving the Settlement Agreement Between Elliott, UMB Bank, N.A., NextEra, and the EFH Plan Administrator Board [D.I. 14335] (the "Motion") filed by the EFH Plan Administrator Board (the "PAB")<sup>2</sup>, on behalf of the entities formerly known as the EFH Debtors and EFIH Debtors, with the United States Bankruptcy Court for the District of Delaware (the "Court") on September 1, 2021.

The undersigned further certifies that he has reviewed the Court's docket in this case and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to

<sup>&</sup>lt;sup>1</sup> The last four digits of Energy Future Holdings Corp.'s tax identification number are 8810. Due to the large number of debtors in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the debtors' claims and noticing agent at http://www.efhcaseinfo.com.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used, but not otherwise defined, herein shall have the same meanings ascribed to them in the *First Amended Joint Plan of Reorganization of Energy Future Holdings Corp., Energy Future Intermediate Holding Company LLC, and the EFH/EFIH Debtors Pursuant to Chapter 11 of the Bankruptcy Code*, filed February 15, 2018 [D.I. 12653].

the *Order Shortening Notice and Setting Response and Objection Deadlines*, entered by the Court on September 2, 2021 [D.I. 14337], responses to the Motion were to be filed and served no later than 4:00 p.m. (Eastern Daylight Time) on September 9, 2021.

The PAB therefore respectfully requests that the proposed form of order attached hereto as **Exhibit A**, which is materially in the same form filed with the Motion, be entered at the earliest convenience of the Court.<sup>3</sup>

[Remainder of page intentionally left blank.]

<sup>&</sup>lt;sup>3</sup> Chambers granted the PAB a waiver of the requirement set forth in Del. Bankr. L.R. 9013-1(j) that a certification of no objection be filed no sooner than "[t]wenty-four (24) hours after the objection date has passed."

Dated: September 9, 2021 Wilmington, Delaware

## /s/ Jason M. Madron

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