

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

In re:

ENERGY FUTURE HOLDINGS CORP., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 14-10979 (CSS)
)
) (Jointly Administered)
)
) **Re: D.I. 14319**
)

**CERTIFICATION OF NO OBJECTION REGARDING THE “EFH PLAN
ADMINISTRATOR BOARD’S MOTION FOR ENTRY OF AN ORDER
FURTHER EXTENDING THE DEADLINE TO FILE AND SERVE OBJECTIONS
TO CLAIMS AGAINST OR INTERESTS IN THE EFH/EFIH DEBTORS” [D.I. 14319]**

The undersigned hereby certifies that, except as expressly set forth herein, as of the date hereof, he has received no answer, objection, or any other responsive pleading to the *EFH Plan Administrator Board’s Motion for Entry of an Order Further Extending the Deadline to File and Serve Objections to Claims Against Or Interests in the EFH/EFIH Debtors* [D.I. 14319] (the “Motion”) filed by the EFH Plan Administrator Board (the “PAB”), with the United States Bankruptcy Court for the District of Delaware (the “Court”) on August 30, 2021.

The undersigned further certifies that he has reviewed the Court’s docket in this case and, except as expressly set forth herein, no answer, objection, or other responsive pleading to the Motion appears thereon.² Pursuant to the *Notice of “The EFH Plan Administrator Board’s*

¹ 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>.

² On September 9, 2021, Alvester Coleman (“Mr. Coleman”) filed the *Creditors [sic] Objection to EFH Plan Administrator Board’s Motion for Entry of An Order Further Extending the Deadline to File and Serve Objections to Claims Against or Interests In the EFH Debtors* [D.I. 14343] (the “Coleman Response”) in response to the Motion. Pursuant to this Court’s *Order*, entered June 1, 2020 [D.I. 14073] (the “Vexatious Litigant Order”), this Court found that Mr. Coleman “is a vexatious litigant” (See

Motion for Entry of an Order Further Extending the Deadline to File and Serve Objections to Claims Against Or Interests in the EFH/EFIH Debtors” and Hearing Thereon filed contemporaneously with the Motion, responses to the Motion were to be filed and served no later than 4:00 p.m. (Eastern Daylight Time) on September 13, 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.

[Remainder of page intentionally left blank.]

Vexatious Litigant Order at ¶ 2), and the Vexatious Litigant Order further provides that “[a]ny further documents, whether in the form of a motion, notice or otherwise, submitted to the Court in these bankruptcy cases by Mr. Coleman will be docketed but will not be considered nor acted upon by the Court” (*See* Vexatious Litigant Order at ¶ 4). Consequently, with permission from Chambers, the PAB is filing this certification of no objection notwithstanding the Coleman Response. *See also Notice of No Judicial Action in Connection With Alvester Coleman’s Vexatious Litigant Pleadings*, filed September 13, 2021 [D.I. 14349].

Dated: September 15, 2021
Wilmington, Delaware

/s/ Jason M. Madron

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EXHIBIT A

Proposed Order

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

In re:

ENERGY FUTURE HOLDINGS CORP., *et al.*,¹

Debtors.

)
) Chapter 11
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) Case No. 14-10979 (CSS)
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) (Jointly Administered)
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) **Re: D.I. 14319**
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**ORDER EXTENDING THE DEADLINE TO
FILE AND SERVE OBJECTIONS TO CLAIMS AGAINST
OR INTERESTS IN THE EFH DEBTORS OR THE EFIH DEBTORS**

Upon the motion, dated August 30, 2021 [D.I. 14319] (the “Motion”)² of the EFH Plan Administrator Board for entry of an order (this “Order”): (a) further extending the deadline to file and serve objections to Claims against or Interests in the EFH Debtors or the EFIH Debtors by approximately 180 days, through and including February 28, 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 Reorganized EFH/EFIH Debtors’, their creditors, and other parties in interest; and the Court having found that the EFH Plan

¹ The last four digits of Energy Future Holdings Corp.’s tax identification number are 8810. The location of the debtors’ service address is 1601 Bryan Street, Dallas, Texas 75201. 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>.

² Capitalized terms used, but not otherwise defined, herein shall have the same meanings ascribed to them in the Motion.

Administrator Board provided appropriate notice of the Motion and the opportunity for a hearing on the 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 (if any was held) 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 Deadline is further extended, through and including February 28, 2022.
3. This Order shall be subject to and without prejudice to the rights of the EFH Plan Administrator Board and/or the Reorganized EFH/EFIH Debtors to request further extensions of the Claims Objection Deadline 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 EFH Plan Administrator Board is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

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