

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

In re:)	
)	Chapter 11
Fred's, Inc., <i>et al.</i> , ¹)	Case No. 19-11984 (CTG)
)	
Debtors.)	Jointly Administered
)	
)	Related Docket No.: 1571

**CERTIFICATE OF NO OBJECTION REGARDING LIQUIDATING TRUSTEE'S
THIRD MOTION TO EXTEND THE CLAIMS OBJECTION DEADLINE**

The undersigned hereby certifies that no answer, objection, or other responsive pleading has been received with respect to the *Liquidating Trustee's Third Motion to Extend the Claims Objection Deadline* [Docket No. 1571] (the "Motion") filed on October 4, 2021. The undersigned certifies that the Court's docket in these cases reflects that no answer, objection, or other responsive pleading to the Motion has been filed. Pursuant to the notice appended to the Motion, objections or responses to the Motion were to be filed and served no later than October 18, 2021 at 4:00 p.m. (prevailing Eastern Time). A hearing on the Motion is scheduled for October 25, 2021 at 10:00 a.m. (prevailing Eastern Time).

Accordingly, the undersigned respectfully requests that the Court enter the proposed form of order attached hereto as Exhibit A, which is identical to the proposed form of order attached to the Motion.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Fred's Stores of Tennessee, Inc. (9888); Fred's Inc. (4010); National Equipment Management and Leasing, Inc. (4296); National Pharmaceutical Network, Inc. (9687); Reeves-Sain Drug Store, Inc. (4510); Summit Properties-Jacksboro, LLC (9161); Summit Properties-Bridgeport, LLC (2200); and 505 N. Main Opp, LLC (5850). The Debtors' address is 6625 Lenox Park, Suite 200, Memphis, TN 38115.

Dated: October 20, 2021
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Ericka F. Johnson

Matthew P. Ward, Esq. (No. 4471)
Ericka F. Johnson, Esq. (No. 5024)
1313 North Market Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 252-4320
Facsimile: (302) 252-4330
E-mail: matthew.ward@wbd-us.com
E-mail: ericka.johnson@wbd-us.com

-and-

LOWENSTEIN SANDLER LLP

Jeffrey L. Cohen, Esq. (admitted *pro hac vice*)
Lindsay H. Sklar, Esq. (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 262-6700
Facsimile: (212) 262-7402
Email: jcohen@lowenstein.com
Email: lsklar@lowenstein.com

Nicole Fulfree, Esq. (admitted *pro hac vice*)
Colleen Maker, Esq. (admitted *pro hac vice*)
Jeremy Merkin, Esq. (admitted *pro hac vice*)
One Lowenstein Drive
Roseland, New Jersey 07068
Telephone: (973) 597-2502
Facsimile: (973) 597-2400
Email: nfulfree@lowenstein.com
Email: cmaker@lowenstein.com
Email: jmerkin@lowenstein.com

*Co-Counsel to the Liquidating Trustee and
the FI Liquidating Trust*