

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

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

**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.

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<sup>1</sup> 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

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