

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

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>CBL &amp; ASSOCIATES PROPERTIES, INC., et al.,</b>	§	<b>Case No. 20-35226 (DRJ)</b>
	§	
	§	<b>(Jointly Administered)</b>
<b>Debtors<sup>1</sup></b>	§	<b>[Related to Docket No. 1464]</b>

**CERTIFICATE OF NO OBJECTION TO DEBTORS' MOTION FOR  
AUTHORITY TO EMPLOY HUSCH BLACKWELL LLP AS SPECIAL  
COUNSEL PURSUANT TO SECTION 327(e) OF THE BANKRUPTCY CODE**

1. On September 24, 2021, CBL & Associates Properties, Inc. and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), filed the *Debtors’ Motion for Authority to Employ Husch Blackwell LLP as Special Counsel Pursuant to Section 327(e) of the Bankruptcy Code* (Docket No. 1464) (the “Motion”)<sup>2</sup>, with a Supplemental Declaration of Ronald I. Feldman of Husch Blackwell (the “Supplemental Feldman Declaration”), attached hereto as **Exhibit A**, and a proposed order granting the relief requested in the Motion attached thereto (the “**Initial Proposed Order**”). Objections to the Motion were required to be filed within twenty-one (21) days from the date of service of the pleading (the “**Objection Deadline**”).

2. In accordance with paragraph 41 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) more than twenty-four (24) hours have passed since the Objection Deadline, (ii) the undersigned counsel is unaware of any objection to the Motion, and (iii) the

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed 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.

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

undersigned counsel has reviewed the Court's docket and no objection to the Motion appears thereon.

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

4. Therefore, the Debtors respectfully request entry of the Amended Proposed Order.

Dated: October 26, 2021

Respectfully Submitted,

**HUSCH BLACKWELL LLP**

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**PROPOSED SPECIAL COUNSEL FOR DEBTORS**

**CERTIFICATE OF SERVICE**

This will certify that a true and correct copy of the foregoing pleading has been forwarded via this Court's CM/ECF notification system to the parties registered for such service on October 26, 2021.

/s/ Buffey E. Klein  
Buffey E. Klein