

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

In re

IN RE ADVANTAGE HOLDCO, INC., *et al.*,

Debtors.

Chapter 11

Case Nos. 20-11259 (CTG)

Jointly Administered

Re: Docket No. 991

**CERTIFICATION OF COUNSEL REGARDING
MOTION TO LIFT STAY OF ALEXIS A. BROWN**

The undersigned, counsel to the above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby certifies as follows:

1. On October 21, 2021, Alexis A. Brown (“Movant”), acting *pro se*, filed the *Motion to Lift Stay* [Docket No. 991] (the “Motion”), which seeks an order lifting the automatic stay to permit insurer Scottsdale Insurance Company (the “Insurer”) to distribute funds to the Movant under a Debtor owned commercial liability insurance policy in settlement of any and all of the Movant’s claims.

2. The Motion, as filed, did not attach a proposed order.

3. The Movant subsequently submitted to Debtors’ counsel the draft proposed order attached hereto as **Exhibit A** (the “Proposed Order”) granting the relief sought in the Motion.

4. Counsel for the Debtors, the Office of the United States Trustee, the Debtors’ DIP Lender, and the Committee reviewed the Proposed Order and do not oppose its entry. Further, the Movant has advised Debtors’ counsel that counsel for the Insurer also does not oppose its entry.

5. Pursuant to the notice of the Motion [Docket No. 992], the deadline to file an objection to the Motion was October 27, 2021. As of the date of this Certification, no responses to the Motion appear on the docket.

WHEREFORE, at the Movant's request, counsel for the Debtors submits the Proposed Order for the Court's consideration.

Dated: November 9, 2021

COLE SCHOTZ P.C.

/s/ Andrew J. Roth-Moore

Norman L. Pernick (No. 2290)

Justin R. Alberto (No. 5126)

Patrick J. Reilley (No. 4451)

Andrew J. Roth-Moore (No. 5988)

500 Delaware Avenue, Suite 1410

Wilmington, DE 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

npernick@coleschotz.com

jalberto@coleschotz.com

preilley@coleschotz.com

aroth-moore@coleschotz.com

*Counsel to the Debtors
and Debtors in Possession*