

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

In re:	§	Chapter 11
	§	
CBL & ASSOCIATES PROPERTIES, INC., et al.,	§	Case No. 20-35226 (DRJ)
	§	
Debtors¹	§	(Jointly Administered)
	§	[Related to Docket No. 1490]

**CERTIFICATE OF NO OBJECTION TO DEBTORS' FIRST OMNIBUS
OBJECTION TO CERTAIN PROOFS OF CLAIM (TRADE CLAIMS)**

1. On October 14, 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’ First Omnibus Objection to Certain Proofs of Claim (Trade Claims)* (Docket No. 1490) (the “**Motion**”)², with a Declaration of Mark A. Renzi of Berkley Research Group (the “**Renzi Declaration**”), attached hereto as **Exhibit A**, and a proposed order granting the relief requested in the Motion attached thereto (the “**Initial Proposed Order**”). The Initial Proposed Order is attached hereto as **Exhibit B**. Objections to the Motion were required to be filed within thirty (30) 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 undersigned counsel has reviewed the Court’s docket and no objection to the Motion appears

¹ 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.

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

thereon.

3. Therefore, the Debtors respectfully request entry of the Proposed Order.

Dated: November 19, 2021

Respectfully Submitted,

HUSCH BLACKWELL LLP

By: /s/ Buffey E. Klein
Buffey E. Klein
Texas State Bar No. 24032515
1900 N. Pearl, Suite 1800
Dallas, TX 75201
(214) 999-6100
(214) 999-6170 (fax)
buffey.klein@huschblackwell.com

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 November 19, 2021.

/s/ Buffey E. Klein
Buffey E. Klein