

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

In re:

BL RESTAURANTS HOLDING, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-10156 (CTG)

(Jointly Administered)

**Related Docket No.: 909**

**Hearing Date: December 6, 2021 at 10:00 a.m. (ET)**

**CERTIFICATION OF COUNSEL REGARDING FIRST OMNIBUS (NON-SUBSTANTIVE) OBJECTION OF THE BL RESTAURANTS GUC TRUST TO CERTAIN (A) DUPLICATIVE CLAIMS; (B) LATE FILED CLAIMS; (C) AMENDED AND SUPERSEDED CLAIMS; AND (D) INSUFFICIENT DOCUMENTATION CLAIMS**

The undersigned counsel to UMB Bank, N.A., solely in its capacity as trustee of the BL Restaurants GUC Trust (the “Trust”), hereby certifies as follows:

1. On October 19, 2021, the Trust filed the *First Omnibus (Non-Substantive) Objection of the BL Restaurants GUC Trust to Certain (A) Duplicative Claims; (B) Late Filed Claims; (C) Amended and Superseded Claims; and (D) Insufficient Documentation Claims* [Docket No. 909] (the “First Omnibus Objection”). Pursuant to the notice attached to the First Omnibus Objection, responses or objections to the First Omnibus Objection were due on or before November 2, 2021 at 4:00 p.m. (prevailing Eastern Time). A hearing on the First Omnibus Objection is scheduled for December 6, 2021 at 10:00 a.m. (prevailing Eastern Time).

2. The Trust has received a response regarding the First Omnibus Objection from each of the following claimants (the “Responding Claimants”):

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<sup>1</sup> The Debtors in these cases are as follows: BL Restaurants Holding, LLC; BL Restaurant Operations, LLC; BL Restaurant Franchises, LLC; and BL Hunt Valley, LLC.

- A. D.L., a Minor [Docket No. 922]
- B. Patricia Romano [Docket No. 926]
- C. Nashville Electric Service [Docket No. 930]
- D. Dean Technologies Inc. [Docket No. 931]
- E. K&D Factory Service Inc. [informal response]
- F. Renee Everett [informal response]
- G. State of Connecticut Unclaimed Property [informal response]

3. With respect to the claims of (i) Dean Technologies Inc., (ii) K&D Factory Service Inc., (iii) Renee Everett, and (iv) State of Connecticut Unclaimed Property, the Trust and the respective claimants have agreed to (x) withdraw the First Omnibus Objection with respect their claims, and (y) fix or reduce and allow their claims in an agreed upon amount by adding their agreed upon claims to the appropriate exhibit attached to the revised proposed order sustaining the *Second Omnibus (Substantive) Objection of the BL Restaurants GUC Trust to Certain (A) No Liability Claims; (B) Overstated Claims; (C) Misclassified Claims; and (D) Unliquidated Claims* [Docket No. 910] (the “Second Omnibus Objection”).<sup>2</sup>

4. The Trust has agreed to withdraw the First Omnibus Objection with respect to the claim of Nashville Electric Service.

5. With respect to the claims of (i) D.L., a Minor, and (ii) Patricia Romano, the Trust and the respective claimants have agreed to adjourn the First Omnibus Objection to the next omnibus hearing date in these cases so that the parties may continue to discuss the resolution of this matter.

6. Except as stated herein, no other responses or objections have been received by undersigned counsel to the Trust with respect to the First Omnibus Objection. Additionally, the undersigned has reviewed the docket of these cases and no other responses or objections to the First Omnibus Objection appear thereon. Accordingly, the Trust has revised the proposed order

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<sup>2</sup> A certification of counsel regarding the Second Omnibus Objection will be filed contemporaneously herewith.

filed with the First Omnibus Objection to reflect the removal of the claims of the Responding Claimants. The revised proposed order (including exhibits thereto, the “Revised Proposed Order”) is attached hereto as Exhibit 1. A redline reflecting the changes between the proposed order filed with the First Omnibus Objection and the Revised Proposed Order is attached hereto as Exhibit 2.

7. Accordingly, the undersigned respectfully submits that the Revised Proposed Order attached hereto as Exhibit 1 may be entered by the Court without further notice or hearing.

Dated: Wilmington, Delaware  
November 23, 2021

**WOMBLE BOND DICKINSON (US) LLP**

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