

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re

DBMP LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**NOTICE OF FILING AND  
OPPORTUNITY FOR HEARING**

**(No Protest Notice – No Hearing Will be Held Unless a Request for Hearing is Filed)**

**PLEASE TAKE NOTICE THAT** on December 8, 2021, DBMP LLC, the debtor and debtor in possession in the above-captioned case (the “Debtor”), filed the *Fifth Motion of the Debtor for Entry of an Order Extending the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. §1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure* [Dkt. 1242] (the “Motion”).

**PLEASE TAKE FURTHER NOTICE THAT** your rights may be affected. You should read the Motion carefully and discuss the Motion with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

**IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE MOTION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION, THEN YOU MUST:**

- (1) A. On or before **December 22, 2021** (the “Response Deadline”), file a written response to the Motion requesting that the United States Bankruptcy Court for the Western District of North Carolina (the “Bankruptcy Court”) hold a hearing thereon. The response should be filed with the Bankruptcy Court at:

Clerk, United States Bankruptcy Court  
P.O. Box 34189  
Charlotte, North Carolina 28234-4189

- B. If you have your attorney file a written response, then the response should be filed with the Bankruptcy Court by electronic means through the

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

Bankruptcy Court's website, [www.ncwb.uscourts.gov](http://www.ncwb.uscourts.gov), under the Debtor's name and case number, as listed above, by the Response Deadline.

(2) Serve a copy of such response, so that it is received on or before the Response Deadline, on (a) the undersigned counsel for the Debtor, (b) all of the parties required to be served pursuant to the Notice, Case Management and Administrative Procedures approved by the Bankruptcy Court in its *Order Establishing Certain Notice, Case Management and Administrative Procedures* [Dkt. 27] (the "Case Management Order") and (c) any other parties required to be served by law or other orders of the Bankruptcy Court.

**PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSES TO THE MOTION ARE TIMELY FILED, THE BANKRUPTCY COURT MAY RULE ON THE MOTION WITHOUT A HEARING.**

(3) If you file a response with respect to the Motion, attend the hearing (the "Hearing") scheduled for **Thursday, January 6, 2022, at 9:30 a.m.** (prevailing Eastern Time), or as soon thereafter as can be heard, before the Honorable Judge J. Craig Whitley at the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division, Courtroom 2-B, 401 West Trade Street, Charlotte, North Carolina 28202.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, A HEARING WILL NOT BE HELD**, and the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting the relief requested therein.

**PLEASE TAKE FURTHER NOTICE THAT** if you would like to receive copies of the Motion or the Case Management Order, you may access such documents: (A) for a nominal fee at the website of the Bankruptcy Court, [www.ncwb.uscourts.gov](http://www.ncwb.uscourts.gov), under the Debtor's name and case number, as listed above; (B) free of charge at the website of the Debtor's claims and noticing agent, Epiq Corporate Restructuring, LLC at <https://dm.epiq11.com/DBMP>; or (C) by written request directed to the undersigned counsel.

Dated: December 8, 2021  
Charlotte, North Carolina

Respectfully submitted,

/s/ Garland S. Cassada

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ATTORNEYS FOR DEBTOR AND  
DEBTOR IN POSSESSION