

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

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| In re: CBL & ASSOCIATES PROPERTIES, INC., et al., Debtors.¹ | § § § § § § § | Chapter 11 Case No. 20-35226 (DRJ) (Jointly Administered) Re: Docket No. 1595 |
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**CERTIFICATE OF NO OBJECTION TO JOINT MOTION OF
DEBTOR BROOKFIELD SQUARE ANCHOR S, LLC AND
ASSOCIATED BANK, NATIONAL ASSOCIATION FOR
ENTRY OF AN ORDER APPROVING (I) SETTLEMENT AGREEMENT
AND (II) AGREED DISMISSAL OF CHAPTER 11 CASE**

1. On November 19, 2021, Brookfield Square Anchor S, LLC (“**Brookfield**” or the “**Debtor**”) and Associated Bank, National Association (“**Associated Bank**,” and together with Brookfield, the “**Movants**”), filed the *Joint Motion of Debtor Brookfield Square Anchor S, LLC and Associated Bank, National Association for Entry of an Order Approving (I) Settlement Agreement and (II) Agreed Dismissal of Chapter 11 Case* (Docket No. 1595) (the “**Motion**”),² with a proposed order granting the relief requested in the Motion attached thereto as Exhibit A (the “**Initial Proposed Order**”). Objections to the Motion were required to be filed and served on or prior to December 10, 2021 (the “**Objection Deadline**”).

2. In accordance with paragraph 44 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) the undersigned counsel is unaware of any objection to the Motion

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ 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.

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

3. The Debtors received informal comments to the Initial Proposed Order from the U.S. Trustee. The amended proposed order, attached hereto as **Exhibit A** (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 B**.

Dated: December 13, 2021
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez
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*Attorneys for Debtors and
Debtors in Possession*

Certificate of Service

I hereby certify that on December 13, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez
Alfredo R. Pérez