

**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**

**CERTIFICATION OF COUNSEL REGARDING  
ORDER APPROVING STIPULATION GRANTING RELIEF FROM  
ANY APPLICABLE STAY AND/OR INJUNCTION WITH RESPECT TO  
PERSONAL INJURY CLAIM OF D.L., A MINOR (CLAUDEAN KIZART, PARENT)**

The undersigned counsel to the BL Restaurants GUC Trust (the “Trust”) hereby certifies as follows regarding the *Stipulation Granting Relief from any Applicable Stay and/or Injunction With Respect to Personal Injury Claim of D.L., a Minor (ClauDean Kizart, Parent)* (the “Stipulation”)<sup>2</sup> attached as Exhibit 1 to the proposed order (the “Proposed Order”) attached hereto as Exhibit A:

1. The Trust and D.L., a Minor (ClauDean Kizart, Parent) (the “Claimant”) entered into the Stipulation on December 14, 2021. Pursuant to and as more fully set forth in the Stipulation, the Trust and the Claimant have agreed to modify any applicable stay and/or injunction to allow the Claimant to pursue any claims with respect to the Incident solely against any applicable insurance proceeds.

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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.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Stipulation.

2. The Stipulation also resolves 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Objection of the BL Restaurants GUC Trust to Certain (A) Duplicative Claims; (B) Late Filed Claims; (C) Amended and Superseded Claims; and (D) Insufficient Documentation Claims* [Docket No. 909] with respect to Claim 10254 filed by the Claimant.

WHEREFORE, for the reasons herein and the Stipulation, the Trust respectfully requests that the Court enter the Proposed Order approving the Stipulation at the convenience of the Court.

Dated: Wilmington, Delaware  
December 14, 2021

**WOMBLE BOND DICKINSON (US) LLP**

/s/ Morgan L. Patterson

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