

**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. 1601]

**CERTIFICATE OF NO OBJECTION IN PART TO DEBTORS' SECOND OMNIBUS
OBJECTION TO CERTAIN PROOFS OF CLAIM (EQUITY CLAIMS)**

1. On November 23, 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’ Second Omnibus Objection to Certain Proofs of Claim (Equity Claims)* (Docket No. 1601) (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. The deadline for parties to file responses to the relief requested in the Objection was December 23, 2021 (the “**Objection Deadline**”). A response was filed by James A. Tuthill regarding Claim Number 304 at Docket No. 1641. A response was filed by David I. Sommers regarding Claim Number 179 at Docket No. 1642. An additional unsigned response was filed after the Objection Deadline by Bobby Tallent regarding Claim Number 202 and Ann G. Tallent

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.

regarding Claim Number 200 at Docket Number 1661. An informal response was received by Debtors from William Buyak in regard to Claim Number 224 and Claim Number 20107. The attached Initial Proposed Order removes Claim Number 179, Claim Number 200, Claim Number 202, Claim Number 224, Claim Number 304, and Claim Number 20107 (the “**Contested Claim Objections**”) from the Exhibit thereto. Debtors will set the Contested Claim Objections for hearing if the Contested Claim Objections cannot be resolved between the parties. Debtors specifically reserves all rights and arguments as to the claims that comprise the Contested Claim Objections and nothing herein shall be taken as an admission or waiver in regard to any facts or legal arguments thereto.

3. 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 objections to the Motion other than those listed in Paragraph 2 herein, and (iii) the undersigned counsel has reviewed the Court’s docket and no objection to the Motion appears thereon.

4. Therefore, the Debtors respectfully request entry of the Proposed Order as to all claims objected to in the Motion excepting the Contested Claim Objections. A redline of the Initial Proposed Order is attached as **Exhibit C**.

Dated: January 3, 2022

Respectfully Submitted,

HUSCH BLACKWELL LLP

By: /s/ Buffy E. Klein
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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 January 3, 2022.

/s/ Buffy E. Klein
Buffy E. Klein