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

In re: § Chapter 11

CBL & ASSOCIATES PROPERTIES, § Case No. 20-35226 (DRJ)

INC., et al.,

§
 (Jointly Administered)

Debtors¹ § [Related to Docket No. 1603]

CERTIFICATE OF NO OBJECTION TO DEBTORS' FOURTH 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' Fourth Omnibus Objection to Certain Proofs of Claim (Equity Claims)* (Docket No. 1603) (the "Motion")², with a Declaration of Mark A. Renzi of Berkley Research Group (the "Renzi Declaration"), attached hereto as <u>Exhibit A</u>, 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 <u>Exhibit B</u>. 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. 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 objection to the Motion, and (iii) the

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 thepurposes 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.

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

3. Therefore, the Debtors respectfully request entry of the Proposed Order.

Dated: January 3, 2022 Respectfully Submitted,

HUSCH BLACKWELL LLP

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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/ Buffey E. Klein Buffey E. Klein