

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BL RESTAURANTS HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-10156 (CTG)

(Jointly Administered)

Related Docket Nos. 942 & 943

**CERTIFICATION OF COUNSEL REGARDING
ORDER APPROVING STIPULATION BETWEEN THE BL RESTAURANTS GUC
TRUST AND AMERICAN EXPRESS TRAVEL RELATED SERVICES**

The undersigned counsel to the BL Restaurants GUC Trust (the “Trust”) hereby certifies as follows regarding the *Stipulation Between the BL Restaurants GUC Trust and American Express Travel Related Services* (the “Stipulation”)² attached as Exhibit 1 to the proposed order (the “Proposed Order”) attached hereto as Exhibit A:

1. The Trust and American Express Travel Related Services (“Claimant”) entered into the Stipulation on January 12, 2022. Pursuant to and as more fully set forth in the Stipulation, the Trust and the Claimant have fully resolved the claims filed by the Claimant in the above-captioned bankruptcy cases (the “Cases”).

2. Specifically, the Stipulation reinstates the claims filed by the Claimant in certain agreed amounts which were disallowed and/or modified pursuant to the (i) *Order Sustaining 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Objection of the BL Restaurants GUC Trust to Certain (A) Duplicative Claims; (B) Late Filed Claims; (C) Amended and Superseded Claims; and (D) Insufficient*

¹ 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.

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

Documentation Claims [Docket No. 942] (the “First Omnibus Order”) and (ii) *Order Sustaining Second Omnibus (Substantive) Objection of the BL Restaurants GUC Trust to Certain (A) No Liability Claims; (B) Overstated Claims; (C) Misclassified Claims; and (D) Unliquidated Claims* [Docket No. 943] (the “Second Omnibus Order”).

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
January 12, 2022

WOMBLE BOND DICKINSON (US) LLP

/s/ Morgan L. Patterson

Matthew P. Ward (DE No. 4471)
Morgan L. Patterson (DE No. 5388)
1313 North Market Street, Suite 1200
Wilmington, Delaware 19801
Tel: (302) 252-4320
Fax: (302) 252-4330

- and -

KELLEY DRYE & WARREN LLP

Eric R. Wilson (admitted *pro hac vice*)
Jason R. Adams (admitted *pro hac vice*)
Lauren S. Schluskel (admitted *pro hac vice*)
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Tel: (212) 808-7800
Fax: (212) 808-7897

Counsel to the BL Restaurants GUC Trust