

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RM BAKERY LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-11422 (MG)

(Jointly Administered)

**FOURTH STIPULATION AND AGREED ORDER TO
EXTEND TIME TO OBJECT TO MOTION OF EPIQ CORPORATE
RESTRUCTURING LLC FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE
EXPENSE PURSUANT TO 11 U.S.C. § 503(b)(1)(A)**

This stipulation and agreed order (the “Stipulated Order”) is made and entered into by and between Debtors and Debtors-in Possession RM Bakery LLC (“RMB”) and BKD Group LLC (“BKD” and together with RMB the “Debtors”) on the one hand, and Epiq Corporate Restructuring LLC (“Epiq”) on the other hand, and is made in reference to the following facts:

RECITALS

WHEREAS, on April 16, 2024, Epiq filed its *Motion of Epiq Corporate Restructuring LLC for Allowance and Payment of Administrative Expense Pursuant to 11 U.S.C. § 503(b)(1)(A)* [Docket No. 369] (the “Motion”).

WHEREAS, the Debtors and Epiq have been engaged in discussions and negotiations in an attempt to resolve the Motion consensually.

WHEREAS, On May 15, 2024, the Debtors and Epiq entered into the *Stipulation and Agreed Order to Extend Time to Object to Motion of Epiq Corporate Restructuring LLC for Allowance and Payment of Administrative Expense Pursuant to 11 U.S.C. § 503(B)(1)(A)* (The “First Stipulation”).

¹ The Debtors in these Chapter 11 Cases and the last four digits of each Debtor’s taxpayer identification number are as follows: RM Bakery LLC (7954) and BKD Group LLC (0624).

Whereas, on May 17, 2024, this Court “So Ordered” the First Stipulation [Docket No. 379.]

WHEREAS, On May 23, 2024, the Debtors and Epiq entered into the Second Stipulation and Agreed Order to Extend Time to Object to Motion of Epiq Corporate Restructuring LLC for Allowance and Payment of Administrative Expense Pursuant to 11 U.S.C. § 503(B)(1)(A) (The “Second Stipulation”).)

WHEREAS, on May 29, 2024, this Court “So Ordered” the Second Stipulation [Docket No. 383.]

WHEREAS, On June 6, 2024, the Debtors and Epiq entered into the Third Stipulation and Agreed Order to Extend Time to Object to Motion of Epiq Corporate Restructuring LLC for Allowance and Payment of Administrative Expense Pursuant to 11 U.S.C. § 503(B)(1)(A) (The “Third Stipulation”).)

WHEREAS, on June 7, 2024, this Court “So Ordered” the Third Stipulation [Docket No. 390.]

WHEREAS, the Debtors and Epiq, in order to facilitate a consensual resolution of the Motion, and to enable the parties to continue negotiations, Epiq and the Debtors have agreed to extend the Debtors’ time to object or otherwise respond to the Motion to July 12, 2024.

NOW, THEREFORE, it is hereby stipulated and agreed by and between the Debtors and Epiq, and upon approval of the Bankruptcy Court, it shall be **SO ORDERED**:

1. The deadline with respect to the Debtors time to Object or otherwise respond to the Motion is hereby extended, through and including July 12, 2024.

2. The Debtors and Epiq reserve all of their respective rights and/or defenses to seek or to oppose any further extension of the deadline with respect to the Motion.

3. This Stipulated Order may be executed using electronic signatures and in more than one counterpart, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

4. The Bankruptcy Court shall retain jurisdiction to construe, interpret and enforce the terms of this Stipulated Order.

Dated: June 20, 2024
New York, New York

RM BAKERY LLC and BKD GROUP LLC

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IT IS SO ORDERED.

Dated: June 21, 2024
New York, New York

/s/ Martin Glenn
MARTIN GLENN
Chief United States Bankruptcy Judge