

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
www.flmb.uscourts.gov**

IN RE:

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC,

Case No. 6:24-bk-02486-GER

RED LOBSTER RESTAURANTS LLC,
RLSV, INC.,
RED LOBSTER CANADA, INC.,
RED LOBSTER HOSPITALITY LLC,
RL KANSAS LLC,
RED LOBSTER SOURCING LLC,
RED LOBSTER SUPPLY LLC,
RL COLUMBIA LLC,
RL OF FREDERICK, INC.,
RED LOBSTER OF TEXAS, INC.,
RL MARYLAND, INC.,
RED LOBSTER OF BEL AIR, INC.,
RL SALISBURY, LLC,
RED LOBSTER INTERNATIONAL HOLDINGS LLC,

Jointly Administered with
Case No. 6:24-bk-02487-GER
Case No. 6:24-bk-02488-GER
Case No. 6:24-bk-02489-GER
Case No. 6:24-bk-02490-GER
Case No. 6:24-bk-02491-GER
Case No. 6:24-bk-02492-GER
Case No. 6:24-bk-02493-GER
Case No. 6:24-bk-02494-GER
Case No. 6:24-bk-02495-GER
Case No. 6:24-bk-02496-GER
Case No. 6:24-bk-02497-GER
Case No. 6:24-bk-02498-GER
Case No. 6:24-bk-02499-GER
Case No. 6:24-bk-02500-GER

Debtors.

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
APPLICATION FOR APPROVAL OF EMPLOYMENT AND RETENTION
OF PACK LAW AS LOCAL COUNSEL EFFECTIVE AS OF JUNE 4, 2024**

NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST FOR HEARING

If you object to the relief requested in this paper you must file a response with the Clerk of Court at the George C. Young Federal Courthouse, 400 W. Washington Street, Suite 5100, Orlando, FL 32801, within (14) days from the date of the attached proof of service, plus an additional three days if this paper was served on any party by U.S. Mail.

If you file and serve a response within the time permitted, the Court will either notify you of a hearing date or the Court will consider the response and grant or deny the relief requested in this paper without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, and the Court may grant or deny the relief requested without further notice or hearing.

You should read these papers carefully and discuss them with your attorney if you have one. If the paper is an objection to your claim in this bankruptcy case, your claim may be reduced, modified, or eliminated if you do not timely file and serve a response.

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the bankruptcy cases of the above-captioned debtors (the “Debtors”), hereby submits this application (the “Application”), pursuant to sections 328 and 1103 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2002-4 of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida (the “Local Rules”), and consistent with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective As of November 1, 2013* (the “Revised UST Guidelines”) and the *Procedure Manual for the United States Bankruptcy Court for the Middle District of Florida* (the “Procedure Manual”), for the entry of an order, substantially in the form attached hereto as **Exhibit A**, authorizing and approving the employment and retention of Pack Law (“Pack Law”) as counsel for the Committee, effective as of June 4, 2024, and in support thereof respectfully states as follows:¹

Background

1. On May 19, 2024 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Middle District of Florida (the “Bankruptcy Court”), commencing these chapter 11 cases (the “Chapter 11 Cases”).

2. The Debtors continue to operate their business and manage their affairs as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

¹ In support of this Application, the Committee relies on the *Declaration of Joseph A. Pack in Support of the Application for the Employment and Retention of Pack Law, P.A. as Local Counsel to the Official Committee of Unsecured Creditors* (the “Pack Declaration”), attached hereto as **Exhibit B**, and the *Declaration of Jennifer Heeringa in Support of the Application for the Employment and Retention of Pack Law as Local Counsel to the Official Committee of Unsecured Creditors* (the “Heeringa Declaration”), attached hereto as **Exhibit C**.

3. No trustee or examiner has been appointed in the Chapter 11 Cases.

4. On May 31, 2024, the Office of the United States Trustee appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code [Docket No. 250]. The Committee is comprised of nine (9) members: (i) Warner Bros. Discovery, Inc., on behalf of itself and its subsidiaries; (ii) Kenneth O. Lester Company, Inc. d/b/a Performance Food Group; (iii) Gordon Food Service Canada Ltd.; (iv) PepsiCo Sales, Inc.; (v) George Parker; (vi) Realty Income Corporation; (vii) Credera Enterprises Company, LLC; (viii) Rubin Postaer and Associates; and (ix) Provender Hall I, LLC and Provender Hall IV, LLC.

5. On June 3, 2024, the Committee selected Pachulski Stang Ziehl & Jones LLP (“PSZ&J”) to serve as its lead counsel. On June 4, 2024, the Committee selected Pack Law to serve as its Florida counsel and Genesis Credit Partners (“Genesis”) to serve as its financial adviser in the Chapter 11 Cases.

Jurisdiction and Venue

6. The Bankruptcy Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. The Committee confirms its consent, pursuant to Bankruptcy Rule 7008, to the entry of a final order by the Bankruptcy Court in connection with this Application to the extent that it is later determined that the Bankruptcy Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

7. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

8. The bases for the relief requested herein are sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, Local Rule 2002-4, the Procedure Manual, and the Revised UST Guidelines.

Relief Requested

9. By this application, the Committee respectfully requests the entry of an order authorizing and approving retention of Pack Law as its local counsel to perform legal services relating to the Chapter 11 Cases, effective as of June 4, 2024.

10. The Committee believes that it is necessary to employ attorneys to render the professional services described herein, and that without such professional assistance, neither the Committee's evaluation of the Chapter 11 Cases, the operations of the Debtors nor its meaningful participation in the negotiation, promulgation, and evaluation of any sale of assets or plan of reorganization would be possible.

Pack Law's Qualifications and Services to be Provided

11. Pack Law is qualified to practice before this Court, and the Committee selected Pack Law because of its attorneys' experience and knowledge in national bankruptcy matters. The Committee believes that Pack Law is well-qualified to represent it in these Chapter 11 Cases.

12. Since opening in May 2020, Pack Law has obtained significant experience representing non-debtor parties in interest, creditors and committee members in highly complex chapter 11 matters, including: the liquidating trust on behalf of the official committee of unsecured creditors in "1-800-411-Pain" (*In re Path Medical, LLC*, Case No. 21-18338 (Bankr. S.D. Fla.)); the official committee member and lead plaintiff for the false advertising consumer plaintiffs in *Bang Energy (In re Vital Pharmaceuticals, Inc.)*, Case No. 22-17842 (Bankr. S.D. Fla.); the credit card processor in *In re Bed Bath & Beyond, Inc.*, Case No. 23-13359 (Bankr. D.N.J.); the part-priming DIP lender and stalking horse bidder in the Gorham Paper Mill case (*In re Gorham Paper & Tissue, LLC*, Case No. 20-12814 (Bankr. D. Del. 2020)); the purchaser of nineteen Florida Auto Plus locations in *In re IEH Auto Parts Holding*, Case No. 23-90054 (Bankr. S.D. Tex.); multi-million dollar undersecured creditors in *In re Lemnure Aquafarms Corp.*, Case No. 23-17306

(Bankr. S.D. Fla.); *In re Virginia True Corp.*, Case No. 19-4269 (Bankr. E.D.N.Y.) and *In re Bird Global, Inc.*, Case No. 23-20514 (Bankr. S.D. Fla. 2023); as well as Sorgente Asset Management Inc. and its affiliates in relation to the Flatiron Building in *In re Historic & Trophy Buildings Fund*, Case No. 22-11461 (Bankr. S.D.N.Y. 2022).

13. Prior to opening Pack Law, Joe Pack advised a number of ad hoc bondholder groups and creditor constituencies who shaped the outcome of complex chapter 11 cases, including, but not limited to, U.S. Bank N.A., as member of the official committee in *In re Nine West Holdings*, Case No. 18-10947 (Bankr. S.D.N.Y. 2018) and fiduciary for all the bondholders, and an ad hoc group of holders of bonds issued by Nine West.

14. Pack Law's experience representing Debtors is also relevant, equipping the Firm to competently represent the Committee as its attorneys are adept at debtor strategies that impede on creditor rights, including, but not limited to, *In re Hurd Inc.*, (Case No. 20-12768) (Bankr. S.D.N.Y. 2020) (in which Pack Law achieved confirmation in 37 days of a "straddle" prepackaged plan during which then Judge Chapman referred to Pack Law's work on the record as "remarkable"); *In re Banyan Cay Resort & Golf, LLC, et al.*, Case No. 23-12386 (Bankr. S.D. Fla. 2023) (through which an approximately \$100 million, operating country club and golf course effectuated a credit bid and takeover of the property); and *In re Mary Brickell Village Hotel, LLC*, Case No. 21-17103 (Bankr. S.D. Fla. 2021) (through which a "100 cent" plan was effectuated and expeditiously resolving a disputed claim related to an alleged bad faith foreclosure on an approximately \$45 million property).

15. Prior to opening Pack Law, Joe Pack also represented debtors in numerous "mega" chapter 11 cases (and retail cases), including: the *Great Atlantic & Pacific Tea Company*, Case No. 10-24549 (Bankr. S.D.N.Y. 2010) ("A&P") and *Avenue Retail Stores (In re United Retail Group*,

Inc., Case No. 12-10405 (Bankr. S.D.N.Y. 2012) (“URG”), which like Red Lobster, required the right-sizing of its lease portfolio, initiatives led by Joe Pack as debtors’ counsel (along with A&P’s and URG’s real estate advisors, respectively).

16. Subject to further order of this Court, the Firm is expected to render, among other services, the following services to the Committee:

- a. Assisting, advising, and representing the Committee in its consultations with the Debtors regarding the administration of the Chapter 11 Cases;
- b. Assisting, advising, and representing the Committee with respect to the Debtors’ retention of professionals and advisors with respect to the Debtors’ business and the Chapter 11 Cases;
- c. Assisting, advising, and representing the Committee in analyzing the Debtors’ assets and liabilities, investigating the extent and validity of liens, and participating in and reviewing any proposed asset sales, asset dispositions, financing arrangements, and cash collateral stipulations or proceedings;
- d. Assisting, advising, and representing the Committee in any manner relevant to reviewing and determining the Debtors’ rights and obligations under leases and other executory contracts;
- e. Assisting, advising, and representing the Committee in investigating the acts, conduct, assets, liabilities, and financial condition of the Debtors, the Debtors’ operations, and the desirability of the continuance of any portion of those operations, and any other matters relevant to the Chapter 11 Cases or to the formulation of a plan;
- f. Assisting, advising, and representing the Committee in connection with any sale of the Debtors’ assets;
- g. Assisting, advising, and representing the Committee in its participation in the negotiation, formulation, or objection to any plan of liquidation or reorganization;
- h. Assisting, advising, and representing the Committee in understanding its powers and duties under the Bankruptcy Code and the Bankruptcy Rules and in performing other services as are in the interests of those represented by the Committee;
- i. Assisting, advising, and representing the Committee in the evaluation of claims and on any litigation matters, including avoidance actions; and
- j. Providing such other services to the Committee as may be necessary in the Chapter 11 Cases.

17. Pack Law will coordinate closely with PSZ&J and Genesis to minimize the duplication of the services provided to the Committee by each professional and meet the scope of the services that each firm is retained to provide.

18. Pursuant to section 1103(b) of the Bankruptcy Code, an attorney employed to represent an official committee may not, while employed by such committee, represent any other entity having an adverse interest in connection with the case. Pack Law has advised the Committee that Pack Law does not hold or represent any other entity having an adverse interest in connection with the Chapter 11 Cases, and does not have any connections with the Bankruptcy Judge presiding over the Chapter 11 Cases, the United States Trustee for Region 21, or any person employed by the Office of the United States Trustee, except as set forth herein and in the Pack Declaration, submitted herewith and setting forth Pack Law's connections with the Debtors, their creditors, and other parties-in-interest in the Chapter 11 Cases.

19. Accordingly, for the reasons stated herein and in the Pack Declaration and the Heeringa Declaration,² the Committee submits that it is in the best interest of the Committee and its members to retain Pack Law as their counsel in the Chapter 11 Cases.

No Adverse Interest and Disclosures Regarding Connections

20. To the best of the Committee's knowledge, Pack Law does not hold or represent any interest that is adverse to the Committee and the Debtors' estates and does not hold or represent any interest adverse to and has no connection with the Committee, the Debtors, their creditors, or

² Consistent with the requirements of Paragraph D.2 of the Revised UST Guidelines, the Committee has attached hereto the Heeringa Declaration as **Exhibit C** to serve as the verified statement of the Committee in support of the Application, which Heeringa Declaration is a declaration executed in accordance with 28 U.S.C. § 1746, as provided for in Paragraph D.2 of the Revised UST Guidelines at footnote 5.

any party in interest herein in the matters upon which PSZ&J is to be retained, except as set forth in the Pack Declaration and subject to Pack Law's ongoing conflicts review

21. Except as disclosed in this paragraph and the Pack Declaration, neither Pack Law nor any of its attorneys has any connection with any party in interest, or their attorneys or accountants, in the Chapter 11 Cases:

- a. Prior to selection as local counsel to the Committee, Pack Law represented Committee member Mr. George Parker, on behalf of himself and those similarly situated, as local bankruptcy counsel. Notwithstanding that Mr. Parker does not represent any interest adverse to the Committee, for the avoidance of doubt and consistent with section 1103(b) of the Bankruptcy Code, Pack Law ceased representation of Mr. Parker, on behalf of himself and those similarly situated, and substituted counsel in these Chapter 11 Cases and related proceedings [Docket No. 304; Adv. Proc. No. 24-00049-GER, Docket No. 4].
- b. Pack Law represents First Data Merchant Services, the Debtors' credit card processor, and certain of its affiliates (collectively, "First Data") in matters unrelated to any matters relating to Red Lobster Management LLC or any of the Debtors or Debtors' affiliates. While Pack Law does not believe a conflict of interest is present, out of an abundance of caution, Pack Law has obtained consent by First Data to represent the Committee. If an issue does arise between the Committee and First Data, Pack Law will not act as counsel for any such matter irrespective of such consent and the absence of a conflict on behalf of First Data.
- c. Pack Law attorney Kelsi Cronkhite is a former associate of Proskauer Rose LLP.

22. The Committee submits that its proposed employment of Pack Law is in the best interests of the Committee and its members, and that no adverse interest or other connection of Pack Law, its attorneys, or its past or present clients infringes on such interest.

23. In the course of Pack Law's practice, Pack Law represents various parties in interest in other bankruptcy cases, including parties who may be creditors of the Debtors. Notwithstanding, Pack Law shall not represent any parties in interest in these Chapter 11 Cases other than the Committee, with respect to any claims such parties may have, collectively or individually, against the Debtors.

24. Similarly, Pack Law may represent, or may have represented, debtors, debtors-in-possession, creditors, or trustees in cases or proceedings against creditors of the Debtors that are unrelated to these Chapter 11 Cases. Pack Law shall not represent any such party in these Chapter 11 Cases.

Pack Law's Proposed Compensation

25. The Committee understands that Pack Law intends to apply for allowance of compensation for professional services rendered on an hourly basis and reimbursement of expenses incurred in connection with the Chapter 11 Cases in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the Revised UST Guidelines, and orders of the Bankruptcy Court. Pack Law's hourly rates for the primary lawyers responsible for this matter, and paraprofessionals, are as follows:

Joseph Pack, Esq.	\$750.00
Kelsi Cronkhite, Esq.	\$520.00
Jessey Krehl, Esq.	\$490.00
Paralegal Support	\$250.00

26. The Committee has been advised that the hourly rates and the corresponding rate structure that Pack Law will use in the Chapter 11 Cases are the same as the hourly rates and corresponding rate structure Pack Law uses in other restructuring matters, whether in court or otherwise, regardless of whether a fee application is required and regardless of the location of the bankruptcy case. Pack Law's hourly rates and corresponding rate structure are designed to fairly compensate Pack Law's professionals and paraprofessionals and to cover routine expenses. The rates and the rate structure also reflect that the restructuring and other complex matters typically are national in scope and involve great complexity, time pressure, and high stakes.

27. The Committee also fully understands that in order to reflect economic realities and other conditions, including for increased cost of overhead, Pack Law revises its hourly rates and

corresponding rate structure periodically and request that, effective as of the date of any such revision, the aforementioned rates be revised to the rates in effect at that time. In the case of any such revision, the Committee understands that Pack Law will provide notice of any rate increases to the Committee, the Debtors, the United States Trustee for the Middle District of Florida, and the Bankruptcy Court.³

28. The Committee was also advised of Pack Law's policy to charge its clients in all areas of practice for all expenses and charges incurred in connection with the client's case, including its reasonable and documented out-of-pocket expenses. The expenses generally charged to Pack Law's clients include office and documented out-of-pocket expenses for: (a) mailing and service, which may include a third-party servicer, (b) printing and photocopies, (c) international telephone, (d) research services; (e) courier service, (f) travel, (g) lien searches, (h) title searches, and (i) recording and filing fees. The Committee has agreed that Pack Law will charge the Committee for these and similar expenses in accordance with requirements by the United States Trustee for the Middle District of Florida.

Notice

29. The Committee will provide notice of this Application to (a) the Office of the United States Trustee; (b) counsel to the Debtors; and (c) all parties who have filed and served requests for notice pursuant to Bankruptcy Rule 2002. The Committee submit that, in light of the nature of the relief requested, no other or further notice need be given.

³ Moreover, Pack Law typically increases the hourly billing rate of attorneys and paraprofessionals in the form of (i) step increases historically in the ordinary course on the basis of advancing seniority and promotion and (ii) periodic increases within each attorney's and paraprofessional's current level of seniority. The step increases do not constitute "rate increases" (as the term is used in the Revised UST Guidelines). Nevertheless, as set forth herein and in the Order, Pack Law will provide ten business-days' notice to the Committee, the Debtors, and the U.S. Trustee before implementing any step increases or periodic increases, and shall file any such notice with the Court.

No Prior Request

30. No prior application or motion for the relief requested herein has been made to this or any other court.

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WHEREFORE, the Committee respectfully request the entry of an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as the Bankruptcy Court deems appropriate under the circumstances.

Dated: July 3, 2024

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF RED LOBSTER MANAGEMENT LLC, *ET AL.***

By: /s/ Jennifer Heeringa

Jennifer Heeringa, North American Director of Credit
Gordon Food Service Canada Ltd.

acting solely in its capacity as Co-Chair of
the Official Committee of Unsecured Creditors
of Red Lobster Management, LLC, *et al.*

Submitted by:

PACK LAW

51 Northeast 24th Street, Suite 108
Miami, Florida 33137
Telephone: (305) 916-4500

By: /s/ Joseph A. Pack

Joseph A. Pack
Email: joe@packlaw.com
Florida Bar No. 117882
Jessey J. Krehl
Email: jessey@packlaw.com
Florida Bar No. 1025848

*Proposed Local Counsel to the Official
Committee of Unsecured Creditors*

Filer's Attestation: Pursuant to Local Rule 1001-2(g)(3) regarding signatures, Joseph A. Pack, Esq. attests that concurrence in the filing of this paper has been obtained.

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing was served this July 3, 2024 to all interested parties registered to receive e-mail notice/service for this case via CM/ECF Notice of Electronic Filing.

By: /s/ Joseph A. Pack
Joseph A. Pack, Esq.

Exhibit A

Proposed Retention Order

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
www.flmb.uscourts.gov**

IN RE:

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC,

Case No. 6:24-bk-02486-GER

RED LOBSTER RESTAURANTS LLC,
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RED LOBSTER CANADA, INC.,
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Case No. 6:24-bk-02500-GER

Debtors.

**ORDER GRANTING OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
APPLICATION FOR APPROVAL OF EMPLOYMENT AND RETENTION
OF PACK LAW, P.A. AS LOCAL COUNSEL EFFECTIVE AS OF JUNE 4, 2024**

Upon the application (the “Application”)¹ of the Official Committee of Unsecured Creditors (the “Committee”) for entry of an order, as more fully described in the Application, authorizing the employment and retention of Pack Law as counsel to the Committee effective as of the June 4, 2024, pursuant to section 1103 of the Bankruptcy Code and Bankruptcy Rule 2014; and upon consideration of the Pack Declaration and the Heeringa Declaration submitted in support of the Application; and the Court being satisfied based on the representations in the Application and the Pack Declaration that Pack Law is qualified to provide the services described in the Application and has disclosed all connections with parties required by Bankruptcy Rule 2014; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and good and sufficient notice of the Application having been given and no other or further notice being required; and the Application having been served upon all interested parties with the Local Rule 2002-4 negative notice legend informing the parties of their opportunity to respond within 14 days of the date of service; and upon no party filing a response within the time permitted; and upon the Court, therefore, considering the Application to be unopposed; and the Court having reviewed the Application; and it appearing that the employment of Pack Law is in the best interests of the Committee and its members; and sufficient cause appearing therefor,

Accordingly, it is **ORDERED**:

1. The Application is **APPROVED** as set forth in this Order.

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

2. The Committee is authorized to employ and retain Pack Law as its counsel in the Chapter 11 Cases in accordance with the terms set forth in the Application pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 201401, effective as of June 4, 2024.

3. Pack Law is authorized to perform any and all of the services for the Committee that are necessary or appropriate in connection with the legal services described in the Application.

4. Pack Law shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Chapter 11 Cases in compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, guidelines established by the Office of the United States Trustee, and any other applicable procedures and orders of the Court. For the avoidance of doubt, and as required by the Local Rules and the Procedure Manual, “Compensation will be determined later in accordance with 11 U.S.C. § 330” and “The hourly rate is not guaranteed and is subject to review.”

5. Pack Law shall use its reasonable efforts, and coordinate with the Committee and their other retained professionals, to avoid any duplication of services provided by any of the Committee’s other retained professionals in these Chapter 11 Cases.

6. The Committee and Pack Law are authorized to take all actions necessary to implement the relief granted in this Order.

7. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

8. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.

9. In the event of any inconsistency between the Application and this Order, this Order shall govern.

#

Submitted by:

Joseph Pack, Esq.

Local Counsel to the Official Committee of Unsecured Creditors

Pack Law, P.A.

51 Northeast 24th Street, Suite 108

Miami, Florida 33137

Tel: 305-916-4500

Email: joe@packlaw.com

Attorney Joseph A. Pack, Esq. is directed to serve a copy of this order on interested parties who do not receive service by CM/ECF and to file a proof of service within three days of entry of this order.

Exhibit B

Declaration of Joseph A. Pack

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
www.flmb.uscourts.gov**

IN RE:

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC,

Case No. 6:24-bk-02486-GER

RED LOBSTER RESTAURANTS LLC,

Jointly Administered with

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Case No. 6:24-bk-02499-GER

RED LOBSTER INTERNATIONAL HOLDINGS LLC,

Case No. 6:24-bk-02500-GER

Debtors.

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**DECLARATION OF JOSEPH A. PACK IN SUPPORT OF THE
APPLICATION FOR THE EMPLOYMENT AND RETENTION OF PACK LAW, P.A. AS
LOCAL COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

I, Joseph A. Pack, being duly sworn, depose and say to the best of my knowledge:

1. I am the President of Pack Law ("Pack Law"), a law firm based in Miami, Florida with its primary office located at 51 Northeast 24th Street, Suite 108, Miami, FL 33137. I am the lead attorney from Pack Law working on the above-captioned chapter 11 cases (the "Chapter 11 Cases"). I am a member in good standing of the Bar of the States of New York, Florida and Wyoming.

2. I have been admitted to practice in the United States Bankruptcy Court for the Middle District of Florida.

3. I submit this declaration (this “Declaration”) in support of the *Official Committee of Unsecured Creditors’ Application for Entry of an Order Authorizing the Retention and Employment of Pack Law, P.A. as Local Counsel Effective as of June 4, 2024* (the “Application”),¹ in compliance with, and to provide disclosures pursuant to sections 328 and 1103 of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

4. Unless otherwise stated in this Declaration, the facts set forth in this Declaration are based upon my personal knowledge or Pack Law’s client/matter records that were reviewed by me or other Pack Law professionals acting under my supervision and direction. To the extent any information disclosed in this Declaration requires amendment or modification upon Pack Law’s completion of further review or as additional information becomes available, a supplemental declaration will be submitted to the Bankruptcy Court reflecting such amended or modified information.

Pack Law’s Qualifications

5. I am duly admitted to practice before all courts of the State of Florida, the State of New York, and the State of Wyoming. I am also admitted to various Federal Courts and other bankruptcy courts around the United States.

6. Pack Law is well-qualified to serve as counsel to the Committee in the Chapter 11 Cases. I founded and opened Pack Law in May 2020 to offer restructuring solutions in highly-sophisticated and complex matters at an approachable rate, without the sacrifice of work quality or experience. Prior to forming Pack Law, I spent almost the entirety of my career representing the world’s largest debtors and investment firms in some of the most hotly contested bankruptcy

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

cases and the quickest prepackaged cases on record. In the four years since Pack Law opened, this Firm has represented debtors, buyers, lenders, creditors, equity holders, directors, officers and management entities in complex cases that have received national recognition. I have also served in the role of a liquidating trustee.

7. Pack Law is qualified to practice before this Court,² and the Committee selected Pack Law because of its attorneys' nation-wide experience and knowledge in bankruptcy matters. The Committee believes that Pack Law is well-qualified to represent it in these Chapter 11 Cases.

8. Since opening just over four years ago, Pack Law has obtained significant experience representing non-debtor parties in interest, creditors and committee members in highly complex chapter 11 matters, including: the liquidating trust on behalf of the official committee of unsecured creditors in "1-800-411-Pain" (*In re Path Medical, LLC*, Case No. 21-18338 (Bankr. S.D. Fla.)); the official committee member and lead plaintiff for the false advertising consumer plaintiffs in *Bang Energy (In re Vital Pharmaceuticals, Inc.)*, Case No. 22-17842 (Bankr. S.D. Fla.); the credit card processor in *In re Bed Bath & Beyond, Inc.*, Case No. 23-13359 (Bankr. D.N.J.); the part-priming DIP lender and stalking horse bidder in the Gorham Paper Mill case (*In re Gorham Paper & Tissue, LLC*, Case No. 20-12814 (Bankr. D. Del. 2020)); the purchaser of nineteen Florida Auto Plus locations in *In re IEH Auto Parts Holding*, Case No. 23-90054 (Bankr. S.D. Tex.); multi-million dollar undersecured creditors in *In re Lemnature Aquafarms Corp.*, Case No. 23-17306 (Bankr. S.D. Fla.); *In re Virginia True Corp.*, Case No. 19-4269 (Bankr. E.D.N.Y.) and *In re Bird Global, Inc.*, Case No. 23-20514 (Bankr. S.D. Fla. 2023); as well as Sorgente Asset

² Pack Law has practiced before this Court, including on behalf of the purchaser in the private sale approved in *In re Huckleberry Partners LLC*, Case No. 22-02159 (Bankr. M.D. Fla. 2022).

Management Inc. and its affiliates in relation to the Flatiron Building in *In re Historic & Trophy Buildings Fund*, Case No. 22-11461 (Bankr. S.D.N.Y. 2022).

9. Prior to opening the firm, I advised a number of ad hoc bondholder groups and creditor constituencies who shaped the outcome of complex chapter 11 cases, including, but not limited to, U.S. Bank N.A., as member of the official committee in *In re Nine West Holdings*, Case No. 18-10947 (Bankr. S.D.N.Y. 2018) and fiduciary for all the bondholders, and an ad hoc group of holders of bonds issued by Nine West.

10. Pack Law's experience representing Debtors is also relevant, equipping the Firm to competently represent the Committee as its attorneys are adept at debtor strategies that impede on creditor rights, including, but not limited to, *In re Hurd Inc.*, (Case No. 20-12768) (Bankr. S.D.N.Y. 2020) (in which Pack Law achieved confirmation in 37 days of a "straddle" prepackaged plan during which then Judge Chapman referred to Pack Law's work on the record as "remarkable"); *In re Banyan Cay Resort & Golf, LLC, et al.*, Case No. 23-12386 (Bankr. S.D. Fla. 2023) (through which an approximately \$100 million, operating country club and golf course effectuated a credit bid and takeover of the property); and *In re Mary Brickell Village Hotel, LLC*, Case No. 21-17103 (Bankr. S.D. Fla. 2021) (through which a "100 cent" plan was effectuated and expeditiously resolving a disputed claim related to an alleged bad faith foreclosure on an approximately \$45 million property).

11. Prior to opening the Firm, I represented debtors in numerous "mega" chapter 11 cases (and retail cases), including: the *Great Atlantic & Pacific Tea Company*, Case No. 10-24549 (Bankr. S.D.N.Y. 2010) ("A&P") and *Avenue Retail Stores (In re United Retail Group, Inc.)*, Case No. 12-10405 (Bankr. S.D.N.Y. 2012) ("URG"), which like Red Lobster, required the right-sizing

of its lease portfolio, initiatives led by me as debtors' counsel (along with A&P's and URG's real estate advisors, respectively).

12. Subject to further order of this Court, the Firm is expected to render, among other services, the following services to the Committee:

- a. Assisting, advising, and representing the Committee in its consultations with the Debtors regarding the administration of the Chapter 11 Cases;
- b. Assisting, advising, and representing the Committee with respect to the Debtors' retention of professionals and advisors with respect to the Debtors' business and the Chapter 11 Cases;
- c. Assisting, advising, and representing the Committee in analyzing the Debtors' assets and liabilities, investigating the extent and validity of liens, and participating in and reviewing any proposed asset sales, asset dispositions, financing arrangements, and cash collateral stipulations or proceedings;
- d. Assisting, advising, and representing the Committee in any manner relevant to reviewing and determining the Debtors' rights and obligations under leases and other executory contracts;
- e. Assisting, advising, and representing the Committee in investigating the acts, conduct, assets, liabilities, and financial condition of the Debtors, the Debtors' operations, and the desirability of the continuance of any portion of those operations, and any other matters relevant to the Chapter 11 Cases or to the formulation of a plan;
- f. Assisting, advising, and representing the Committee in connection with any sale of the Debtors' assets;
- g. Assisting, advising, and representing the Committee in its participation in the negotiation, formulation, or objection to any plan of liquidation or reorganization;
- h. Assisting, advising, and representing the Committee in understanding its powers and duties under the Bankruptcy Code and the Bankruptcy Rules and in performing other services as are in the interests of those represented by the Committee;
- i. Assisting, advising, and representing the Committee in the evaluation of claims and on any litigation matters, including avoidance actions; and
- j. Providing such other services to the Committee as may be necessary in the Chapter 11 Cases.

13. Pack Law will coordinate closely with PSZ&J and Genesis to minimize the duplication of the services provided to the Committee by each professional and meet the scope of the services that each firm is retained to provide.

No Adverse Interest and Disclosures Regarding Connections

14. Section 1103(b) of the Bankruptcy Code does not incorporate the general “disinterestedness” standard of section 327(a) of the Bankruptcy Code. However, Bankruptcy Rule 2014 requires that an application for employment under section 1103 disclose all connections with the Debtors, their estates, their professionals, and the U.S. Trustee. Therefore, Pack Law discloses its known connections herein.

15. Pack Law does not hold any interest adverse to the interest represented by the Committee. During the period of its employment, Pack Law and its attorneys will not hold any interest adverse to the interests represented by the Committee.

16. Pack Law used its standard firm procedures to investigate its relationship to the parties in interest in the Chapter 11 Cases.

17. In preparing this Declaration, I reviewed lists of the creditors and interested parties of each of the Debtors, as disclosed by the Debtors, as set forth in **Schedule 1**, attached hereto.

18. While I believe the following connections should be disclosed for candor to the Court, I do not believe they impair Pack Law’s ability to serve as local counsel to the Committee or otherwise constitute a conflict of interest:

- a. Prior to selection as local counsel to the Committee, Pack Law represented Committee member Mr. George Parker, on behalf of himself and those similarly situated, as local bankruptcy counsel. Notwithstanding that Mr. Parker does not represent any interest adverse to the Committee, for the avoidance of doubt and consistent with section 1103(b) of the Bankruptcy Code, Pack Law ceased representation of Mr. Parker, on behalf of himself and those similarly situated, and substituted counsel in these Chapter 11 Cases and related proceedings [Docket No. 304; Adv. Proc. No. 24-00049-GER, Docket No. 4].

b. Pack Law represents First Data Merchant Services, the Debtors' credit card processor, and certain of its affiliates (collectively, "First Data") in matters unrelated to any matters relating to Red Lobster Management LLC or any of the Debtors or Debtors' affiliates. While Pack Law does not believe a conflict of interest is present, out of an abundance of caution, Pack Law has obtained consent by First Data to represent the Committee. If an issue does arise between the Committee and First Data, Pack Law will not act as counsel for any such matter irrespective of such consent and the absence of a conflict on behalf of First Data.

c. Pack Law attorney Kelsi Cronkhite is a former associate of Proskauer Rose LLP.

19. Pack Law will use reasonable efforts to determine that no conflicts or disqualifying circumstances arise during the pendency of the Chapter 11 Cases. If any new material facts or relationships are discovered or arise, Pack Law will use reasonable efforts to identify them and will promptly file a supplemental declaration, as required by Rule 2014(a) of the Bankruptcy Rules.

Compensation Arrangement

20. Pack Law intends to apply for compensation for professional services rendered in connection with the Chapter 11 Cases on an hourly basis and reimbursement of expenses incurred in connection with the Chapter 11 Cases, subject to the Bankruptcy Court's approval and in compliance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures and orders of the Bankruptcy Court.

21. The hourly rates and corresponding rate structure Pack Law will use in the Chapter 11 Cases is the same as, similar to, or less than the hourly rates and corresponding rate structure that Pack Law uses in other restructuring matters and in similar corporate matters, whether in court or otherwise, regardless of whether a fee application is required. These hourly rates and corresponding rate structure reflect that: such restructuring and other complex matters typically are national in scope and involve great complexity, high stakes, and severe time pressures;

the Pack Law attorneys handling this matter are capable and competent to handle such matters effectively.

22. Pack Law’s current hourly rates for matters related to the Chapter 11 Cases, is as follows:

Joseph Pack, Esq.	\$750.00
Kelsi Cronkhite, Esq.	\$520.00
Jessey Krehl, Esq.	\$490.00
Paralegal Support	\$250.00

23. Pack Law suggests that its hourly rates are comparable or lower than those charged by attorneys with similar educational background, and of similar experience and expertise. Hourly rates vary with the experience and seniority of the individuals assigned. These hourly rates are subject to periodic adjustments to reflect economic and other conditions.³

24. Pursuant to Bankruptcy Rule 2016(b), Pack Law has not shared nor agreed to share
(a) any compensation it may receive in the Chapter 11 Cases with another party or person or
(b) any compensation another person or party has received or may receive.

25. Except as set forth herein, none of Pack Law’s professionals have had or presently have any connection with the Committee or the Debtors with respect to any matters for which Pack Law is to be engaged, and Pack Law is not a creditor of the Debtors.

Attorney Statement Pursuant to Revised UST Guidelines

26. As stated above, Pack Law shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Chapter 11 Cases in

³ Pack Law typically increases the hourly billing rate of attorneys and paraprofessionals in the form of (i) step increases historically in the ordinary course on the basis of advancing seniority and promotion and (ii) periodic increases within each attorney’s and paraprofessional’s current level of seniority. The step increases do not constitute “rate increases” (as the term is used in the Revised UST Guidelines). Nevertheless, as set forth herein and in the Order, Pack Law will provide ten business-days’ notice to the Committee, the Debtors, the U.S. Trustee, and any official committee before implementing any step increases or periodic increases, and shall file any such notice with the Court.

compliance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, Local Rules, and any other applicable procedures and orders of the Court. Pack Law also intends to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective As of November 1, 2013* (the "Revised UST Guidelines"), both in connection with the Application and the interim and final fee applications to be filed by Pack Law in the Chapter 11 Cases.

27. The following is provided in response to the request for additional information set forth in Paragraph D.1 of the Revised UST Guidelines:

- a. **Question:** Did Pack Law agree to any variations from, or alternatives to, Pack Law's standard billing arrangements for this engagement?

Answer: No. Pack Law and the Committee have not agreed to any variations from, or alternatives to, Pack Law's standard billing arrangements for this engagement. The rate structure provided by Pack Law is appropriate and is not significantly different from (a) the rates that Pack Law charges for other non-bankruptcy representations or (b) the rates of other comparably skilled professionals.

- b. **Question:** Do any of the Pack Law professionals in this engagement vary their rate based on the geographic location of the chapter 11 cases?

Answer: No. The hourly rates used by Pack Law in representing the Committee are consistent with the rates that Pack Law charges other comparable chapter 11 clients, regardless of the location of the chapter 11 case (i.e., irrespective of whether such client is in Orlando or in New York City).

- c. **Question:** If Pack Law has represented the Committee in the 12 months prepetition, disclose Pack Law's billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If Pack Law's billing rates and material financial terms have changed postpetition, explain the difference and the reasons for the difference.

Answer: Pack Law did not represent the Committee prior to the Petition Date. Pack Law's current hourly rates for services rendered on behalf of the Committee are set forth in the Application and in this Declaration.

- d. **Question:** Has the Committee approved Pack Law's budget and staffing plan, and, if so, for what budget period?

Answer: N/A. As Committee counsel, the Firm anticipates that the Committee's professional fees will be initially governed by the Debtor in Possession Financing order and budget approved in these cases. The Committee and its professionals reserve all rights to seek approval of Committee professional fees.

[Remainder of Page Intentionally Left Blank]

I declare under penalty of perjury under the laws of the United States and the State of Florida that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 3, 2024

By: /s/ Joseph A. Pack

Joseph A. Pack, Esq.

51 Northeast 24th Street, Suite 108

Miami, FL 33137

Telephone: (305) 916-4500

Email: joe@packlaw.com

Schedule 1 to the Declaration of Joseph A. Pack

Potential Parties in Interest

Top Vendors

3301669 Nova Scotia Company	Itw Food Equipment Group LLC
3b2 Solutions LLC	Johnson Controls Us Holdings LLC
Adp Inc.	Kenneth O Lester Company Inc.
Alixpartners Holdings LLP	(Performance Food Groups)
AlSCO Inc.	Kepler Group LLC
A O Smith Water Products	Logan Clark III
Apex Systems Inc.	Luxone LLC
Aramark Uniform And Career Apparel Group Inc.	Marsh Usa Inc.
Baker & Hostetler LLP	Merkle Inc.
Barkley Inc.	Microsoft Corporation
Blackhawk Network Inc.	Mobo Systems Inc.
Broadstone Rl Portfolio LLC	Nuco2 Inc.
Buntin Advertising Inc.	Op Oakhurst Realty LLC
Coastal Sunbelt Produce	Oracle America Inc.
Cintas Corporation No 2	Paint Folks
Construction Operations And Renovation Experts	Pegnato Roof Intelligence Network
Costa Do Soesto LLC	Piedmont Cnl Towers Orland LLC
Creation Gardens	Presidio Networked Solutions LLC
Credera Enterprises Company LLC	Presto Automation Inc.
Dinova Inc.	Pricewaterhouse Coopers LLP
Directv	Rubin Postaer And Associates
Doordash Inc.	Sandy Alexander Inc.
Ecolab Pest Elimination	Sirna & Sons Inc.
Engie Insight Services Inc.	Slade Gorton & Co Inc.
Enviro Master Services LLC	Slm Waste & Recycling Services Inc.
Eplus Technology Inc.	Spirit Realty LP
First American Exchange Company LLC	Strategic Solutions Inc.
Four Corners Operating Partnership LP	State Industries Inc.
Freshpoint Inc.	Synq3 Restaurant Solutions LLC
Gartner Inc.	The Wasserstrom Company
Gordon Food Service Canada Ltd.	Town Center Refrigeration Inc.
Gfs Canada Ltd.	Twc Services Inc.
Helloworld Inc.	Usp Apollo LLC
Interactive Communications International Inc.	Vereit Operating Partnership LP
Ipsos Insight LLC	Weil Gotshal & Manges LLP
	Zurich American Insurance Company

Banks, Administrative Agents, Secured Lenders and UCC Lien Parties

Blue Torch Credit Opportunities

BTC Holdings Fund

DBDB Funding LLC

First Insurance Funding

First Insurance Funding of Canada

Fortress Credit Corp.

Great America Financial Services Corporation

TCW Asset Management Company, LLC

TCW Skyline Lending LP

Wells Fargo Bank, N.A.

Debtor Professionals

Berger Singerman LLP
Blakes, Cassels & Graydon LLP
Epiq Corporate Restructuring LLC
Hilco Corporate Finance LLC
Keen-Summit Capital Partners
King and Spalding LLP
Stephanie Medley

Debtors

Red Lobster Canada, Inc.
Red Lobster Hospitality LLC
Red Lobster International Holdings LLC
Red Lobster Management LLC
Red Lobster Of Bel Air, Inc.
Red Lobster Of Texas, Inc.
Red Lobster Restaurants LLC
Red Lobster Sourcing LLC
Red Lobster Supply LLC
RL Columbia LLC
RL Kansas LLC
RL Maryland Inc.
RL Of Frederick, Inc.
RL Salisbury, LLC
RLSV, Inc.

Directors/Officers (Current and Former)

Kate Acosta	Timothy Alexander Sibley
Carrie Barner	Ravinder Singh
Patrick Bartels	Michael Sjuggerud
Raymond Blanchette, III	Jonathan Tibus
Rittirong Boonmechote	Trin Tapanya
Charles Braley	Kelli Valade
Tim Breen	Angela Wang
Joseph Brown	Jarrett Whitlow
Michelle Carr	Kathy Wood
Thiraphong Chansiri	Fung Yan
David Cifelli	Joyce Zhang
Elizabeth Crago	Monica Zhou
Joann Dashiell	
Horace G. Dawson, III	
Miranda Farren	
Richard Fung	
Ludovic Garnier	
Michael Greenberg	
Ana Gulacsy	
Shawn Harrs	
Nicholas Haughey	
Tonya Heron	
Lawrence Hirsh	
Aurinelis Infante	
Robert Knopp	
Matt Livesay	
David Michael Martin	
Jef Matray	
Daniel Mcleod	
Jeff Matray	
Arlene Mussenden	
Susan Pavel	
Jeffrey Peete	
Carlos Pena	
Meera Pereira	
Michelle Rhoades	
Ribeiro Hui Services Ltd.	
Norma Rivera	

Equity Holders

Double P Consultants Co. Ltd.
Employee Share Trust
FWM Asia Holdings Limited
FWM Dragon Holdings Limited
FWM F&B Holdings Limited
GGCOF RL Blocker, LLC
Intero Investment Gmbh
Paul Kenny
Terrance Tan Konghwa
Stefan Leicht
Red Lobster Hong Kong Ltd.
Red Lobster Master Holdings Gp, LLC
Red Lobster Shanghai Limited (Cn)
RL Co-Investor Blocker LLC
RL Management Holdings LLC
RL Management Investors LLC
Kanya Ruengprateepsang
Seafood Alliance Limited
Shanghai Honglong Wei Hui F&B Management Co. Ltd.
Thai Union Group Publicl Company Limited
Thai Union Investments North America LLC
Thai Union North America, Inc.
Rit Thirakomen
Vineland Ventures Limited
Fung Yan

Indemnity / Guarantee Parties

ARCP Acquisitions, LLC
ARCP RL PORTOLIO I, LLC
ARCP RL PORTOLIO II, LLC
ARCP RL PORTOLIO III, LLC
ARCP RL PORTOLIO IV, LLC
ARCP RL PORTOLIO V, LLC
ARCP RL PORTOLIO VI, LLC
ARCP RL PORTOLIO VII, LLC
ARCP RL PORTOLIO VIII, LLC
ARCP RL PORTOLIO IX, LLC
ARCP RL PORTOLIO X, LLC
Broadstone RL Portfolio, LLC
Liberty Mutual

Insurance Providers

0510 KLN Lloyd's Syndicate
Ace American Insurance Company
AIG
Allied World Insurance Company
American Guarantee and Liability
American International
Arch Insurance Company
Ascot Specialty Insurance Company
Axis Insurance Company
Axis Surplus Insurance Company
Bowring Marsh Bermuda
Columbia Casualty Company
Continental Insurance
Endurance Assurance Corporation
Everest Indemnity Insurance Co.
Everest National Insurance Company
Federal Insurance Company (Subsidiary of Chubb)
Fireman's Fund Insurance Company
Hartford Fire Insurance Co.
Landmark American Insurance Company
Lloyd's Of London
Markel Bermuda
Ohio Casualty Co.
Ohio Insurance Agents Association Inc. Retro Group
Palms Insurance Company, Limited
Starstone Specialty Insurance Company
Swiss Re Corporate Solutions Elite
Talbot Syndicate Tal1183
Travelers Property & Casualty Company of America
Westchester Fire Insurance Company (Subsidiary of Chubb)
Zurich American Insurance Company
Zurich Canada
Zurich North America

Known Affiliates & JVs

Red Lobster Asia Holdings Limited
Red Lobster Cares, Inc.
Red Lobster China Operations Co. Limited
Red Lobster Holdings LLC
Red Lobster Hong Kong
Red Lobster Intermediate Holdings LLC
Red Lobster Master Holdings, L.P.
Red Lobster Seafood Co., LLC
RL Billings, Inc.
RL Of Jonesboro, Nc.
Shanghai Honglong Wei Hui F&B Management Co.
Shanghai Red Lobster F&B Management Company

Landlords

1st Coast Energy	3360 Camp Creek Parkway Owner LLC
10010 Station LLC	3815 South Lamar, LP
100 Ih 35 North Owner LLC	3909 Sunset Drive Owner LLC
10920 Moorpark LLC	39401 Fremont Boulevard LLC
109 West Anderson, LP	411 Lenox Realty Inc.
10th Fairway LLC	416 Commerce Center Drive LLC
112 RLT LLC	4230 Broadway Realty Co. Inc.
1120 South Walton Partners LLC	454 W 22 St LLC
1123 - New Plan Hampton Village, LLC	6091 Sawmill Road LLC
116 Rlt LLC	500 Galleria Dr - 10108896 LLC
1229 Richmond LLC	5950 North Federal Investments LLC
1340 East 9th Street Realty Corp.	6701 18th Avenue Associates LLC
1359 Sn Owners LLC	684 Myrtle Ave Realty LLC
13612 Harbor Boulevard LLC	684 Myrtle Avenue Realty LLC
1420 Noble Ave LLC	714 Yonge Street Inc.
1601 Dahill Properties Inc.	698000 Alberta Ltd.
170 Wolf Road LLC	801 Red Lobster LLC
1726 Nc LLC	8040 Kingston Pike Road Owner LLC
1846 Jonesboro Road Owner LLC	828 Eastern Bypass Owner LLC
1885 Ltd.	8407 Little Road Owner LLC
20 Towne Center Owner LLC	95metcalf Properties InC
2015 Wesel Blvd LLC	99 Year Lease
2300 Restaurant Corp	9069 Vantage Point Drive Owner LLC
2325 East Flamingo LLC	Aark USA LLC
2328 Commercial Way Properties LLC	Aasthi LLC
2355 North Highway 41 Associates, LLC	Enayat Abrishami
237 Uptown Inc.	Enayat Abrishami And Naima Abrishami
2474 Valentine Realty LLC	Ackrik Associates, LP
2525 Bowling Green LLC	Adam Eidemiller Inc.
2620 Mcfarland Blvd East LLC	Admns Meadowlands Investment
27th Mesa LLC	Corporation
29 Ocean Parkway LLC	Advanced Housing Developers Inc.
300, LLC	Afli2 LLC
3087 Associates LLC	AIB Management I LP
3087 Rlga, LLC	Aib Shenandoah I, LLC
3130 Plainfield Road, LLC	Airway Centre Inc.
32 Blanding Boulevard Owner LLC	Airway Centre Inc. C/O Carillion Services
3301669 Nova Scotia Company	Inc.

Aj Chen LLC
Akerman LLP
Alamance Crossing Cmbs, LLC
Alamo Crossing Commercial Association
Alexandria Seafood LLC
Alin Urun
Allan R Hoffman
Allstate Plaza West M2c Attn: Commercial
Mortgage Div
Almaden Plaza Merchants Assoc
Almaden Plaza Shopping Center, Inc.
Alr Racanelli LLC
Alva Investment Corp
Alysheba Association Inc.
Amb Property LP
American Finance Operating Partnership LP
American General Life Ins. Co. & National
Union Fire Ins. Co. Of Pittsburgh Pa
American Realty Capital Properties, Inc.
American United Life Insurance Company
Andersen Jung & Co.
Andrew J Bass Jr Irrevocable
Andrew J Bass Jr Irrevocable Trust
Andyharris LLC
Amj Wolf Corp
Anna Buecheler Investment Partnership
Annapolis Mall Shopping Ctr Co.
Annapolis Mall Shopping Center Company,
LLP
Annapolis Management Company C/O The
Beatson Companies
Antelope Valley Mall
Antelope Valley Shop, LLC
Apache Mall, LLC
Geraldine Aprahamian
Arc Clorfl001, LLC
Armel LLC
Arundel Mills Limited Partnership
Arvig4 LLC
Ashby, Inc.
Atherton Development Company LP
At Home Holding Iii Inc.
Aucallutim LLC
August America LLC
Aviana Company Ltd.
Aviana Company Ltd. LLC
Avr Cpc Associates LLC
B33 Re Partners Investments Lll LLC
B33 Yuma Palms Iii LLC
B&A Development Real Estate Div Inc.
B&L Storage
Ballard Spahr LLP
Bancohio National Bank
Thomas J. Barger, Esq.
Barlas Rlr LLC
Tom Bass
Bassuk Brothers Management
Bay City Mall Partners LLC
Bay Plaza West LLC
Bay Plaza West, LLC C\O Prestige
Properties & Development Co., Inc.
Bdg Sufka LLC
Bel Air Square, LLC
Belk-Hudson Company Of Waycross, Ga,
Inc.
Wayne Belleau
Wayne A Belleau
Belos Exchange LLC
Belos Holding LLC
Beluz Properties X Ltd.
Benedetti & Associates
Bennett Boehning & Clary LLP
Ber Real Estate Investments Iv, LLC
Bertha Aiken LLC
Bhagat Md LLC
Big Red LLC
Big V Properties LLC
Bison Palm Desert, LLC
B Kline Family LLC
Black Sand Capitl Series 1 Mb, LLC

Blackstock Westside Associates LLC
Blj Holdings, LLC
Bluestripes Investments LLC
Blue Tree Properties Oh LLC
Boise Towne Plaza LLC
Boise Towne Plaza LLC C/O General
Growth Properties
Boise Towne Square
Bowles Crossing
Boyton Town Center
Bpg Hotel Partners Vi, LLC
Bpr Ff LLC
Bpw Inc.
Brand Property Management Corporation
Brandywine Commons Asc Of Rest
Bre Ddr Retail Holdings Iii LLC
Steven E Breitman
Briarholm Inc.
Norene Brink
Brixmor Operating Partnership LP
Broadridge Apartments LLC
Broadstone Rl Portfolio LLC
Broadway & Nevada LLC
Broadway & Pearl Associates, LLC
Broadway And Pearl Associates LLC
Brock Associates LLC
Brookside Improvements LLC
Brooks Shopping Center LLC
Brooks Shopping Centers LLC
Brown-Belkin Rl LLC
K. Bellamy Brown Murphy & Posner
Bryan Rental Inc.
Budd Street, LLC
Buildings For Babies Foundation
Burkhardt Development Group Inc.
Burns White
Paul A Butera
George A. Butler, Esq.
Bva Deerbrook Spe LLC
William N Cafritz @ Aip Associates LP
California Property Owner I, LLC
Caltamp Realty Associates LLC
Campbell Blacklidge Plaza De LLC
Camwood Construction Ltd.
Canada Redlob LP
Carnegie Management & Development Corp
Cassco Land Company Inc.
Catalina Partners L.P. C/O Glimcher
Colonial Park Mall, Inc.
Causeway Associates C/O Greater Lakeside
Corp.
Cay\Mem Joint Venture C\O Geogr Young
Cbl & Associates Limited Partnership
Cbl & Associates Management, Inc.
Cbl & Associates Properties, Inc.
Cbl Rm-Waco, LLC
Cbl-T-C LLC
Cb Portfolio, LLC
Centennial Real Estate Management, LLC
Centerpointcap I LLC
Center Pointe Associates, LP
Centrecorp Management Services Limited
Century Plaza Commercial LLC
Cg Watertown LLC
Cg Watertown LLC And Pw Watertown
LLC
Channel Islands Marketplace, LP
Charles & Co. Realty LLC
Damian Charles
Charles L Cauthorn Real Estate &
Development
Charlottesville Fashion Square
Kisan B Chavan
T. Paul S. Chawla, Esq
Harry S. Cherken, Jr, Esq. Biddle And Reath
Cheung K. Tom Leung & Betty Yuen-Wah
Leung Trust
Ch Gresham LLC
Chillicothe Mall Inc.
Christopher James Management Company

Chula Vista Center, LP
Chula Vista Center Management Office
Cielo Vista Mall Mgmt. Office
Cigna Investments Inc. C/O Cigna
Investment Group
Cincinnati Holding Company LLC
Citicorp Usa, Inc. C/O Citycorp North
America Inc.
City Of Colorado Springs
City Of Danbury
City Of North Charleston
Cj & J Corporation
Clk Ann Arbor, LLC
Cloud Enterprises Corporation Inc.
Cobb Place Associates
Coddling Enterprises
Coddling Enterprises LP
Cole Credit Property Trust Iv Inc.
Colonial Park Mall Realty Holding LLC
Conroe Marketplace S C, LP
Cookeville Tn Investment Partners
Coolsprings Crossing Limited Partnership
Coltrane Real Estate Investments LLC
Compass Commercial Inc.
Conway Inn Corp
Coral Ridge Mall
Cornhusker Project Gi2 LLC
Costa Do Soesto LLC
Country LLC
Country Orchard Estates Inc.
Courtelis Company
Cousins Prop. Of Tn, Inc. Attn: Henry
Cenker, Vp-Land
Cox, Castle & Nicholson
Cpp River Falls LLC
Cpp River Falls LLC & Cpp River Falls Ii
LLC As Tenants In Common
Credit Lyonnais New York Branc C/O
Chicageo Real Estate Group

Credit Lyonnais New York Branc Credit
Lyonnais Building
Cri Outparcels LLC
Cr Kingston Associates LLC
Crosspoint Realty Services Inc.
C. S. Fossee C/O Reale Fossee
Cumberland Mall Realty Holding LLC
Curry Investment Company
Curtis C. Curry Q Tip Trust
Dacf Invest-4 LLC
Harry Dahl
Dan C Inc.
Dale Hale, LLC
Danville Mall LLC
David + Gilbert LLP
David L Lansky
Davrich Realty Corp
Ddr Homestead LLC
Ddr Southeast Fountains LLC
Dees Sugar House Center LLC
Del Amo Associates LLC
Developers Diversified Realty Corporation
Developments West Corporation
Development West Corporation C/O Cb
Commercial Property Mgn
Diadon LLC
Diajeff LLC C/O Kin Properties, Inc.
Dillard Department Stores Inc. Dean L.
Worley, Asst Gen Cnsl
Diversified Investments Corp. Attn: Barbara
Riel
Dixie Partners V LP
D J W Properties LLC
Dlc Management Corporation
D.L. Grove, Inc.
Donovan LLP
Drescher & Cheslow, P.A.
Grant R Drawing
Drury Development Corporation
Drury Inns, Inc.

Dtc Development Msp LLC
Duvall & Fall, P.C.
East Lampeter Associates LP
Eastridge LP
East West Crossings LLC
Edmark I LLC
Edward C. Smith C/O J.T. Jackson Co.
Edward F. Selby And Linda L. Selby, As
Trustees Of The Edward And Linda
Selby Trust Dated May 29, 2012
Edward J. Debartolo Corp.
Ege5 LLC
Eirrek Rlf LLC
Elhio Ii LLC
Elhio LLC
Elhio LLC & Elhio Ii LLC
Joseph El Sineitti
Elyria Midway Mall LLC
Empire Mall, LLC
Esters-183 Joint Venture Attn James R
French
Esue LLC
E. Thomas Nasoff Co.
Eugenia F. Haasis Trust
Evergreen Commercial Property
Management

Fab-Rite LLC
Fair Oaks Community Development
Corporation
Far Horizons Trailer Village LLC
Jina Farzinpour
Fcpt Holdings LLC
Federal Realty Op LP
Federman Steifman LLP
Ferguson & Saunders
Renee L Ferrero
Renee L. Ferrero, Trustee
Frankie Fesko
Fima Development

First & Main LLC
First And Main, LLC C/O Norwood
Limited, Inc.
First Arizona Rl Associates LLC
First Internet Bank Of Indiana
First Internet Bank Of Indiana - Mike Lewis
First National Realty Partners
First New York Partners
Benjamin Fiscella
William Fisher
William C Fisher Jr And Janet Fisher
Fk Properties LLC
Flamingo Eastern LLC
Ilene Flaum
Fleet Bank
Fleet Bank National Assoc
Florida National Properties Inc./W.C.I.
Florida National Properties Inc. / W.C.I.
Communities
Florida Plaza Owners Association Inc.
Floyd Lewis Real Estate
Fnw Realty Corp
Fnwrl LLC
Formosa Developers Inc.
Fortified Beltway Lanham LLC
Forty One Connector, Ltd.
Four Corners Operating Partnership LP
Four Hand Realty LLC
Fox River Shopping Ctr LLP
Fox River Shopping Center Ltd. C/O
General Growth Center Co.
Fox River Shopping Center LLP C/O
General Growth Prop. Inc.
Frenchtown Charter Township Business
Park Assoc Inc.
Frisco 3056 Preston LLC
Fr White Marsh, LLC
Fslro 10700 Parallel Kansas City LLC
Ft. Sheri Fort Wayne LLC

Ft Sheri Realty LLC A New York Limited
Liability Company
G&I X Crossroads Mzl LLC
Galleria At Wolfchase LLC
Galo Properties Inc.
Joseph Garofalo
Gateway Center Properties, LLC
Gateway Center Prop I LLC
Gcfp Limited Partnership
Gelly LLC
Marvin H Geistlinger
General Counsel Merchandise Group
Geneva Management LLC
Geneva Rl Venture LLC
George And Flora Dunaians Revocable
Trust
George Dunaians And Flora Dunaians
Revocable Trust
Kent J. George, Esquire C/O Robinson &
Mcelwee PLLC
Jeannette D Germann
Gershenson Realty & Investment, LLC
Tilde Mariani Giacche
Gina El Sineitti Estate
Girardeau P2 LLC
Glr Property Management LLC
Ruth Goodman
Gotham Organization, Inc.
Gpg Clovis Holdings LLC
Gpg Clovis Owner LLC
Ggp Limited Partnership
Ggp Mall Of Louisiana LLC
Gp Texarkana LLC
Grae La Sierra LLC
Grand Robster LLC
Grand Robster LLC; Lompoc Jack LLC;
Handy Hardees LLC
Grd Properties, LLC
Greater Lakeside Corporation As Agent For
Causeway Associates
Great Northern Management Pr, LLC
Greenberg Traurig, LLP
Greentree Apartments LLC
Greenway Property LLC
Greenwood Mall Realty Holding LLC
Gressley, Kaplin & Parker LLP
Gri Eqy Sparkleberry Square LLC
Grupo Tj Properties
Gsms 2001-Gc5 East Broadway Boulevard,
LLC
Gsms 2011 Gc5 East Broadway Boulevard
LLC
Gtl Properties
Gtl Properties, LLLP
Aldo Guidotti
Guidotti Properties
Guima Brazil Usa LLC
Gurnee Mills Operating Company
Haasis/Mcgrath Joint Venture Acc
No 1036-7826
Kiemle Hagood
Hai Yue Tx LLC
Douglas V Hale
Halme & Clark
Hamburg, Karic, Edwards & Martin LLP
Hanabi
Hanabi A California General Partnership
H&R Property Management Ltd.
Handy Hardees LLC
Harbor Plaza LLC
Harco Capital LLC
Harmon Meadow Owner LLC
Haq Corporation
Hartman, Simons, Spielman & Wood, LLP
Harwell Capital, LLC
Hawaiian Properties Ltd.
Hc Lakeshore LLC
Hcl Goodyear Centerpointe LLC
Hcl Inglewood Village LLC

Hcl Inglewood Village, LLC C/O Haagen
Company, LLC
Hendrie Family Properties LLC
Herbert & Isabel Wolfe Trust
Herzman Nieces Exempt Trust
Herzman Nieces Exempt Trust U/D/T
December 15, 1972
Hickory Grove Community LLC
Hickory Hollow Development Inc.
Hickory Point LLC
Hiffman National, LLC
Highland Lakes Property LLC
Hkt Enterprises LLC
Hoffman 4101 Veterans Memorial LLC
Hoffman 4101 Veterans Memorial LLC,
C/O Woodson Development Co.
Holland & Hart LLP
Ned S. Holmes, Trustee
Home Depot U.S.A., Inc.
Home Properties
Homestead Pavilion Acquisition LLC
Homestead Pavilion Acquisitions LLC
Peter Moon Hong
Horlbeck, LLC, Alexander G. Thompson,
Ruth Ann Curry, Trustee
Howarth, Glenn S.
Hrp 0137 San Antonio, LLC
Hunter Equities 309 LLC
Hunter Equities 326 LLC
Hurst Savage & Vanderburg, L.L.P.
Id Seafood LLC
Illiana Realty
Imperial Life Assurance Co. Of Canada
Imperial Parking Canada Corp
Independence Properties 348 LLC
Indiana Land Trust Company - Trust #3518
Indigo Park Canada Inc.
Inland Southeast King's Grant, L.L.C.
Interstate Management LLC
Ironwood 1 LLC

Ironwood I, LLC
Ivision Holdings LLC
Jaffe Raitt Heuer & Weiss Pc
James F. Mcgrath
James M. Tomlin Attorney At Law
Janet M Robinson
Jcc California Properties LLC
Jcp Realty, Inc. Mail Stop 2102-Bldg B-1
Jeanne Jackson As Administratrix
Jeanne Jackson, Administratrix Of The
Estate Of Lee Jackson
Jaks LLC
Jal Enterprises Inc.
James Campbell Company LLC
Roger J Janow
Jfcf Invest-3 LLC
Jh Dreyfus LLC
Jll
Joe Amato East End Centre LP
John Hancock Mutual Life Insurance
Company
Johnsons Trailer Parks LLC
Jo-Lyn Management Corp
Jps Realty Management LLC
Jones Lang Lasalle
Jones Lang Lasalle Americas, Inc.
Joseph Garofalo 2017 Trust
Joseph P. Klapholz, Pa
Jssa Ventures Inc.
J T Jackson Company
Jtn-Rl LLC.
Juan Smyrna Owner LLC
Karruli LLC
Katy Mills Mall LP
Kb Riverdale LLC
Christel Kelley
Kelso Rl Property LLC
Kennedy Mall Ltd.
Kennedy Mall, Ltd. D/B/A Great East Plaza
Annex

Phil R Kensinger
Kensinger & Company, LLC
Kensinger Properties Ltd., C/O Kensinger &
Company, LLC
Kentucky Oaks Mall Company
Keystone Fiesta Plaza LLC
James Khezrie
Kimco Realty Corporation
Kimco Realty Op LLC
Kimven Corporation C/O Kimco Realty
Corp
King Of Prussia Pa Retail LLC
Kin Properties Inc.
Kir Copiague LP
K.I.R. Copiague L.P. C/O Kimco Realty
Corporation
Kite Realty Group LP
Kite Realty Group Trust
Kiu Nd Holdings LLC
Knickerbocker Properties, Inc.
Knox & American I LLC
Kolee 59 Trust
Steve Koroneos
Konstantine P. George
Kplp Ii LLC
Harry & Sarah Kranc
Sarah Kranc
Philip L. Kreitlein, Esq.
Krishnamoorti Family Limited Partnership
Krishnamoorti Family LP
Kriss & Feuerstein LLP
Kroll, Mcnamara, Evans & Delehanty, LLP
Ks Aob Toronto Inc.
Ks Aob Toronto Inc. And Dundas Atrium
Toronto Inc.
Ks Seafood LLC
Geoffrey M Kunz
William Kunz
Kuzmak-Williams, LLC
La Frontera Landlord LLC
La Jolla Group B LLC
L & A Michigan Partners, Ltd.
Landsource Inc.
L&S Toluca Properties
Lake Park Investors LLC
Lakeside Ootb Ventures, LLC
Lakes Mall Realty LLC
Lakewood Center Mall Attn: Mark Long,
G.M.
Lane4 Property Group
Langston Seawright
Thomas A. Langston
Lansing Retail Center LLC
Dennis Lapidus
Larco Management LLC
Largo Plaza C/O Kimco Realty Corporation
Laurel Lakes LLC
Laurel Lakes, LLC C/O Maryland Financial
Investors, Inc.
Lauth Management, LLC
L B Billingsley Investment Co.
Lbx Deptford Th LLC
Lbx Management LLC
Lebcon Associates Ltd.
Ledgewood Outparcel Investors LLC
Emily Ko Lee
Lehigh Valley Associates
Lehigh Valley Mall LLC
Leibco Realty Limited
Leland W Pollard
Cheung K Tom Leung
Levine Family Trust
Levitt & Boccio, LLP
Levy Family Limited Partnership
Michael A Lightman Sr
Limestone Redcan Ulc
Limestone Redlob LLC
Lincoln Center LLC
Lincoln Center LLC C/O Shorestein
Properties LLC

Lincoln Holdings LLC
Steve Lin
Linda Roth, P.A.
Linden Business Center Assn
Lo Brothers Investment Co Ltd.
Lo Brothers Investment Co, Ltd. C/O
Archigraph Inc.
Lobster Building
Lobzona LLC
Lod Jacksonville LLC
Lohrmann & Rim, P.C.
Lompock Jack LLC
Longfish Improvements LLC
Louis Joliet Realty LLC
Lowe's Home Centers Inc.
Loyal Plaza Sc LLC
Loyal Plaza Sc Realty Fund LLC
Lpk Holdings, LLC And Bpw, Inc.
Lpre Holdings LLC
Lsg1 Crossroads Square LLC
Lth Investments LLC
Luxone LLC
Lufkin Mall Realty Holding LLC
L W Riverdale LLC
Lyn-Jo Washington LLC
Macerich Lakewood, LLC C/O Macerich
Management Company
Macwh LP
Macys Inc.
Macy's Retail Holdings, LLC - Ca
Madden Family LLC No 3
Madison East Towne LLC
Mae Dean Wheeler Trustee
Main & Main Del Paso LLC
Mall Del Norte LLC C/O Cbl & Associates
Management Inc.
Mall Of Louisiana
Mall Of Louisiana, LLC
Mall Of South Carolina Outparcel LP
Mall Of South Carolina Outparcel LP C/O
Cbl & Assoc. Mgmt. Inc.
Manhattan 338 Corp
Maplewood Partners LLC
Marci Shapiro LLC
Marine Iron & Ship Bldg Co Inc.
Marine Iron & Ship Building Company
Marion Plaza Associates LP
Marion Plaza Associates LP C/O Madison
Acquisitions, LLC
Mark J. Freitag, Trustee Of The Mark J.
Freitag Trust Of 1988
Mark J Freitag Trust Of 1988
Benjamin Marks
Marland Limited Partnership
Marquette Realty Capital, LLC
Maryland Financial Investors, Inc.
Robert Mascall And Susan Woodell Mascall
Mbi Red Lob LLC
Mcd 6 LLC
Mcclure & Kornheiser, LLC
Mccrary Law, P.C.
Mrs. Eleanor Mcgrath
Mckinley Mall
Mckinley Mall, LLC
Dr J Roland Mckinney & Mrs Martha
Mckinney
M.D. Atkinson Company, Inc.
Meile Investment LLC
Meile Investment, LLC D/B/A Doubletree
By Hilton Monrovia-Pasadena
Meislik & Levavy
Alan Merovitch, Esq.
Mesa Valley Housing Associates II Limited
Partnership
Gerald Messuri
Gerald And Rita Messuri
Metrocenter Mall - Management Office
Metro North Crossing LLC
Meyers, Roman, Friedberg & Lewis

Mga Mcdonough, LLC
Mga Ventures Inc.
Michael, Levitt, Goldberger & Rubenstein,
LLC
Mi Claw LLC
Midamerica Hotels Corporation
Mid-Atlantic Property Jt LLC
Middletown I Resources L P
Midway Shopping Center, L.P.
Millcreek Plaza Company Limited
Partnership
Milpitas Town Center 2008 LP
Frank Mineo
Mir Queens Place Associates, LLC
Mir Queens Place LLC
Mission San Jose LLC
Mkn Property Inc.
Ml Claw LLC
M. Leo Storch Management Corporationrch
Developer
Anne Mohr As Trustee Of The Horst Mohr
Trust
Monica Inc.
Montgomery Cross Retail Group LLC
Montvista LLC
Moorland Medicine LLC
Morguard Boynton Town Center Inc.
Mortgage Electronic Registration Systems,
Inc.
Mosites Development Company
Mount Hunger Holdings LLC
Mpnt Michigan LLC
Mpnt Realty LLC
Vincent A Muzzi
Myers, Roman, Friedberg & Lewis
Nadg Nnn Rlob May Nj LP
Naples Leasing 416 LLC
Kannan Natarajan Co-Trustee
Natarajan Living Trust
Bahram Navid
Navid Bypass Trust 07262020
Byron Navid
Kefayat Navid
Navid Qtip Trust 07262020
Nelson Slosbergas, P.A
Net Leased Management
New Plan Hampton Village LLC
New Towne Mall Realty Holding LLC
New York Mutual Life Insurance Company
Nexbank Ssb
Nextgen Woodside Realty LLC
Next Tech Development LLC
North American Development Group
Northfield Bank
Northfield Stapleton Associates LLC
Northtown Square LLC
Northtown Square, LLC C/O Stejer
Development, LLC
North Valley Plaza, LLC
North Valley Plaza, LLC C/O Kimco Realty
Corporation
Northwest Promenade LLC
Nts Corporation - Spoa
Nwcc Center Plaza LLC - 0010448
Nwcc Investments Ii LLC
Oakdale Village LLC
Oaktree Investments 4 LLC
Oakwood Plaza Limited Partnership
Oakwood Plaza LP
Obeach LLC
Ocean Bank
Cozen O'connor
Ocre Investments LLC
Office Complex Enterprises Inc.
Offit Kurman, P.A.
Olesen Al LLC
Omaha Cave Partnership LP
Omaha Cave Partnership, L.P. C/O St. Louis
County Realty Co.
Ontario Mills Ltd. Partnerhip

Op Oakhurst Realty LLC
Orion Investment & Management Ltd.,
Corp.
Orion Real Estate Group
Orlando Plaza Partners
Outer Banks Limited Partnership
Overland Corp Center Property
Ovm Delaware LLC, Campbell Blackledge
Plaza De LLC, First Ave./Wetmore
Office Plaza De LLC, And Twovm
Investments LLC
Owned
Oxford Development Company – Moraine
Oxford Development Company Associates
Pacific Premier Retail Trust LLC
Soon Chun Nanci Pak
Panobster LLC
Pared Motel Associates LLC
Robert D Parham
Robert D. Parham & Judy J. Parham
Park East LLC
Park Mall LLC
Park Place Management Pr, LLC
Parkway Crossing Association
Shashikant Patil
Bishwendu K Paul
Paul Mantella Limited And Horner
Developments Limited
Peconic LLC
Penn Mutual Life Insurance Company
Peoples Security Life Insurance Co. (Loan
87758)
Juan Perez
Jose Perez
Otto M Perez
Perini Land & Development Co.
Persam Wethersfield LLC
Pfa-C Silver Spring Lc
Pfp Columbus Ii LLC
Pheasant Realty LLC
Phillips Edison Arc Shopping Center
Operating Partnership LP
Phoenix Ig, LLC
Phoenix Partners LLC
Piedmont Cnl Towers Orland LLC
Pierre Bossier Mall Realty Holding LLC
Pine Bluff Income Properties LLC
Pine Ridge Mall C/O Capital Real Estate
Services, LLC
Pine Ridge Mall Jc, LLC
Pine View Enterprises LLC
Pinlen Lubbock LLC
Piper Rudnick LLP
Piqred LLC
Pk Ii El Camino North LP
Pk Ii El Camino North, LP C/O Kimco
Realty
Plaza Speedway LLC
Pointe @ Tampa Palms Association Inc.
Port Mcdonald, Inc.
Pottstown Center LP
Pottstown Center LP C/O Longview
Management
Pran Mccain LLC
Pratt Goldsmith Inc.
Preferred Associates LLC
Prestige Properties & Development Co., Inc.
Price Development Company LP Inactive
See Lad1295
Prime Bank
Prime Site Development, Inc.
Private Restaurant Properties, LLC
Prologis LP
Promenade Red Cliffs L.L.C
Provender Hall I LLC
Provender Hall Iv, LLC
Prss LLC
Prudential Insurance Co. Of America Attn:
T.C. Kennif
Puma Industries 307 LLC

Pvsc Company
Pw Watertown LLC
Qr Rushmore LLC
Quail Lakes Executive Plaza Association
Quail Lakes Owners Association
Queensbury Plaza I, LLC
Rai Sawak LLC
Rai Union Realty, LLC
R&H Properties LP
Radiant Sunset Building, LLC
Rainbow Investment Co
Rainbow Investment Co LP
Ramco Jacksonville LLC
Raymarc Re LLC
Rb Sandrini Farms LP
Rcg-Psc Camp Creek Owner, LLC
Rcg Ventures, LLC
Rdhw Management LLC
Real Estate Services Inc.
Realty Income Corporation X 2293
Redd Realty Services C/O Redd Realty
Services
Red Garden LLC
Redlob Sheppard Avenue Limited
Partnership
Redlob Sheppard Avenue LP
Red Lobster Of Lakeland LLC
Red Lobster St Cloud Mn LLC
Red Olive Properties LLC
Red Summit Fair LLC
Redwood Nc LLC
Reep-Rtl Dtc Va LLC
Regency Centers Corporation
Regency Centers LP
Regency Commerce Center Owners Assoc
Inc.
Reims Incorporated
Related Retail Management Corporation
Retail Opportunity Investments Partnership
LP
Retail Value Trs LLC
Rfh1 LLC
Rgli LLC
Rh Tacoma Place Associates LLC
Rh Tacoma Place Associates, LLC And
H.I.R. 3
Rhyl Realty Inc.
Richmond Mall Partners, LLC
Ridge Line Inc.
Riocan Management Inc.
Riocan (Reit) West
Ripco Management, LLC
River Oaks El Paso, LLC
River Oaks Properties Ltd.
River Prairie LLC
Riverside Income Fund I LP
Rivertown Point Court Property Owners
Association
Rjp Rl I Drive LLC
Rl1ak LLC
Rl12580 LLC
Rl 4010 LLC
Rl Arizona LLC
Rlca Properties Inc.
Rl Charleston Owner LLC
Rl Decatur LLC
Rl Elizabethtown LLC
Rl Enterprises LLC
Rlfl, LLC
Rl Jensen Beach LLC
Rl Kaf LLC
Rl Kbn LLC
Rl Kokomo LLC
Rl Lcg LLC
Rl Madison Heights LLC
Rl Mpn LLC
Rl New Brunswick Owner LLC
Rl Ptx LLC A Texas Limited Liability
Company
Rl.Ptx LLC C/O Ron Demilt

Rl Schaumburg LLC
Rl Sdn LLC
Robbies Inc.
Robbie's Inc. C/O Charles Robertson
Rockstep Christiansburg, LLC
Rod De Llano Family Partnership LP
Rogers Towers, P.A.
Roic California
Roic California, LLC
Roland, Fogel, Koblenz & Carr
Round Rock Rl LLC
Rouse Properties LLC
Rouse Properties Reit Inc.
Roworth Enterprises, LLC
Rpi Salisbury Mall LLC
Rprl Mobile LLC
Rprl Stony Brook LLC
Rprl Union 22 LLC
Rpt Realty LP
Rsc Associates LLC
Rsjs Travis Blvd LLC
Rvm Glimcher LLC
Rvt Homestead Pavilion LLC
Rxr 5ts Holdings Jv LLC
Rxr 5ts Owner LLC
Rxr Realty
Ryg Realty Inc.
Rynako LP
Sabbl-Nampa, LLC
Sacramento Savings Bank
Saga Canadian Management Services
Limited
Saga LLC
Saint Anthony Real Estate LLC
Salinas Shopping Center Associates LP &
Harden Ranch Plaza Associates LLC
Salisbury Mall Realty Holding LLC
San Bernardino Restaurant Asso C/O The
Graymont Group
San Bruno Towne Center Partnership
Sanmarco Company
Santa Fe Mall Realty Holding LLC
Sarl Jv
Sayage Valdosta LLC
Mark Saydah
Scf Rc Funding I, LLC
Scf Rc Funding III LLC
Scf Rc Funding Iv LLC.
Scfrc-Hw-V LLC
Sc Heights LLC
Schamel, Jannice
Karen K Schneeberger
Karen K. Schneeberger And Frank A. Mineo
Schneider, Stuart
Scp Northfield, LLC
Scp Reo Fund Northfield Splitter LP
Scullin Real Estate V LLC
Scullin Real Estate Vii LLC
Bob Scullin
Robert J Scullin
Sears, Roebuck & Co.
See Screen 21
Edward F Selby
Linda Lea Selby
Seltzer Caplan McMahon Vitek
Seminole Mall Realty Holding LLC
Serg 13 LLC
Serota Islip Ga, LLC
Shades Creek R&I Corp Tutwile Properties
Ltd.
Shantinath Cs LLC
Shapell Properties, Inc.
Shawnee Mall Owner LLC
Shoppes At Solana LLC
Shop Towne Center Inc.
Simonian Family 2008 Trust
Simon Property Group L.P.
Simon Prop Grp Silver Springs Series, A
Series Of Owl's Nest Properties, LLC
(Tx) LP

Simon Property Group (Texas), L.P. C/O
Simon Property Group
Shorenstein Properties LLC
Shutts & Bowed LLP
Shutts & Bowen LLP
Sierra Property Management
Silver Spring Series, A Series Of Owl's Nest
Properties, LLC
Skyhy Property LLC
Sleiman Enterprises, Inc.
Smbisiris LLC
Smith Bros.-Ziegler
Smith Family Trust
Smith Family Trust Dated 1-7-1982
Smith Legacy LLC
Smith Ranches
Richard L. Smith C/O J.T. Jackson Co.
Robert C. Smith C/O J.T. Jackson Co.
Walter F. Smith C/O J.T. Jackson Co.
William H. Smith C/O J.T. Jackson Co.
Sm Mesa Mall, LLC
Sms Ambassadors Corp
Snowden Square Phase Ii Retail Center
Association Inc.
Socrates Investments Inc.
Solano Town Center Owner LLC
Southbay Highlands Limited Partnership
Southeast Realty Associates LLC
Southeast Realty Associates, LLC C/O Win
Properties, Inc.
Southern Hills Mall Realty Holding LLC
South Florida Property Management, Inc.
South Forks Associates
Southlands Colorado LLC
Southmall Development Company C/O
Robert R. Brown & Co.
South Midtown Properties LLC
Spadea Inc.
Gerald L Spande
Speedway95 LLC
Spencer Development LLC
Spencer Real Estate LLC
Spinosa Management Group, LLC
Spinosa Real Estate Group, LLC
Spirit
Spirit Master Funding Ix, LLC
Spm Acquisition LLC
Spoorna Holdings LLC
Sports Arena Village Ltd.
Sports Arena Village, Ltd. Commercial
Space Coordinator
Spotsylvania Towne Center
Spring Hill Mall Realty Holding LLC
Srb Gateway, LLC
Sss Northwest Crossing LLC
Sss Northwest Crossing LLC & Sss
Northwest Marketplace LLC
Ss Small Mouth Parkersburg LLC
Stagnaro, Saba & Patterson Co., Lpa
Star-West Great Northern Mall LLC
Staunton Em 2 LLC
Steates Remmell Steates And Dziekan
Steerpoint Capital II, LLC
Stemmons Crossroads Assoc
Stiles Property Management
Stockdale Management, LLC
Stone Land, LLC
Stout Law LLP
Stuart Co.
Sunbeam Development Corporation
Sundler & Daniels C\O Thomas Daniels,
Esq
Sunrise Hills
Superior Steel Studs Inc.
Sure Fire Group LLC
Surfside Square Condominium Association
Inc.
Swb-Lynn Holdings LLC
Swift Creek Associates LP

Swift Creek Associates, L.P. C/O Bet
Investments
Sw Investments, LLC
Swr-Lv LLC
Swr - Lv, L.L.C. C/O Redd Realty Services
Symetra Life Insurance Company
Taag Ventures LLC
Taitz RI Mobile LLC
Tampa Palms North Owners Association
T&D Smith Family Trust Dated July 2, 1996
Tanger Outlets Deer Park, LLC
Tanger Properties Limited Partnership
Target Stores
Taylor & Monroe LLC
Tcam Core Property Fund Operating LP
Tech One Associates
Ted And Marias Plaza LLC
Tehans Realty Company
Tehan's Realty Company C/O Tehan's
Catalog Showrooms, Inc.
T Eastgate Plaza Nr Nv, LLC
Terrana Law P.C.
Texas Hotel Management LP
The 2015 Hong Family Trust
The Aprahamian Trust
The Atkins Group
The Bahieh Jina Farzinpour 2001 Living
Trust
The Denny Law Firm, PLLC
The Estate Of James Campbell
The Evelyn D Benedetto Family Partnership
LLP
The Evelyn Dibenedetto Family Partnership
LP
The George Family Trust
The Gerrard Family Limited Partnership
LLLP
The Harry And Jeanette Weinberg
Foundation Incorporated
The Howard Group
The Jean Ann Becker Revocable Trust Dated
10-19-2007
The Kisan B. Chavan & Kundan K. Chavan
Livng Trust
The Law Offices Of Stanley P. Kupfer, P.C.
The Macerich Partnership LP
The Paul Family Trust Dated June 19, 1997
The Prado Sc, LLC
The Promenade Diberville LLC
The P Smith Realty LLC
The Raphael Family Wooster Street
Company LLC
The Shoppes At Solana, LLC
The Simpson Organization, Inc.
The Steve Hongdur Lin And Carol Yao Lin
Revocable Trust Dtd 7/22/94
The Storage Bin Inc.
The Villages Commercial Property
Management
The Villages Commercial Property
Mangement
The Vireo Group
The Woods Of East Brunswick Property
Owners Association Inc.
Thf Chesterfield Development, LLC
Thf Chesterfield Dev LLC
Thf Maplewood Outparcel Development
LLC
Thf Realty, Inc.
Thf St Clairsville Develop LP
Thf St. Clairsville Development, L.P.
Thomas Peter Moyer Trust
Thompson & Company Inc.
Thompson, Welch, Soroko & Gilbert LLP
Three Rivers Mall L.L.C.
Three Rivers Village, LLC
Tmp Sre 1 LLC
Tmp Sre I, LLC
Tn Oak Ridge Rutgers LLC
Tom & Lee Holding Co LLC

Tom & Lee Holding Company, LLC And Tom Family Trust Of 1984	M Copley Vickers C/O M. Copley Vickers & Associates, P.C.
Tornig Ga LLC	Villages / Acorn Investments Ltd.
Town West Realty, Inc.	Village/Acorn Investments, Ltd.
Tpi 1960 Retail LLC	Village At Burlington Owners Association
Tpi Cypress Pointe LLC	Vinsue Corp
Tso Winchester Station LP	Vno 7000 Hadley Road LLC C/O Vornado Realty Trust
Travel Lobster LLC	Vornado Realty Trust
Tribella Properties LLC	Vsr4 Investments LLC
Tri-Cities Investment Co. Attn: Joe Thalman	Michael Scott Walker
Trinity Development Group Inc.	Wal-Mart Real Estate Business Trust
Trinity Property Services - Itf - Admns	Wal-Mart Stores, Inc. Property Management
Triple Bar York Marketplace LLC	Walster LLC
Tr Uwo Fred Ziess	Washington Mall - Jcp Associates, Ltd.
Twelve Oaks Mall Ltd. Partnrshp	Washington Mall- Jcp Assoc Ltd.
Two D Holdings LLC	Washington Prime Property Limited Partnership
Ub Midway LLC	Washington Prime Property LP
Ue 2100 Route 38 LLC	Waterford Lakes Town Center LLC
Ue 675 Route 1 LLC	Weatherby Enterprises
Union Bank	Patricia A Weatherby
Union Bank & Trust	Patricia Weatherby And Mary K. Darin
University Venture Corp	Weingarten I-4 Clermont Landing LLC
Uptown Partners Ltd.	Westcor Partners
Urban Edge Properties LP	Westcor Inactive See Lad1804
Hacik Urun	Westlakes Mall Tom Schammel, G.M.
Us Centennial Malls Jv LLC	Westerman Ball Ederer Miller Zucker & Sharfstein, LLP
Usp Apollo LLC	Westport Plaza Ltd.
Ut Heights LLC	Westridge Park Investors Limited Partnership
V2 Associates LLC	Westridge Park Investors L P
Valley Stream Green Acres LLC	Whitehorse 3 LLC
Van Vliet Acquisition Iv LLC	Whrl Mobile LLC
Vasiliki, LLC	Whrl Rl Mobile LLC
Philip Velka	Whrl Stony Brook LLC
Venable LLP	Widewaters Group Inc.
Vera Cruz Properties LP	Widewaters Lakewood Village Center Company, LLC
Vera LLC	
Vereit	
Vereit Operating Partnership LP	
Vestar Bowles Crossing LLC	
Vestar Crossroads Gilbert LLC	

Wild Realty 1, LLC
Wild Realty 3, LLC
Wilk Auslander LLP
Wilkinson Companies, Inc.
Wilkinson Dekalb Land Company LLC
Winchester Seafood LLC
Windsor Realty Ltd. Partnership
Winmar Company, Inc. Ronald Roberts,
S.V.P.
Louis Wintermeyer
Robert & Susan Woodall-Mascall, Trustees
Of Mascall Family Trust
Woodbridge Heights Associates LLC
Woodbury Corp
Woodside Parma LLC
Woodsonia Hwy 281, LLC
Woods Rogers Plc
Woolley, Dale & Dingwall Barristers &
Solicitors
World Class Investments LLC
Wp Centers Reit 2 LLC
Wpe Investment 10 LLC
Wv Lonestar Owner LLC
Yasmon 19 Group LLC
Yavapai Prescott Indian Tribe
Roy Timothy Young
Roy T. Young, Trustee Of The Roy Timothy
Young Revocable Trust Uad April 6,
2011
Henry E. Ziegler C/O J.T. Jackson Co.
Zuricha Capital Ltd.

Litigation Parties

2355 North Highway 41 Associates LLC
3909 Sunset Drive Owner, LLC
Bdg Sufka, LLC
Eleasia Blackman
Esperanza Carr
E. O. Magdalia Colon
Maria Dasilva
Ecolab Inc.
Elton Garrett
Ggc Real Estate Investments I, L.P.
Linda Guccini
Nadina Hujic, N.B. (Nadia Hujic's Minor
Son), And Monique Lewis
Anna Hurlston
Ipsos-Insight, LLC
Louis R. Oliveira And Garen A. Oliveira
Family Trust Dated April 15, 2020
Luxone, LLC
Dezzie Ray Marshall (Class Action)
Op Oakhurst Realty, LLC As Successor To
Provender Hall Iv LLC
Rainbow Investment Co., LP
Melissa Randazzo
Carrie Robertson
Roworth Enterprises, LLC
Hector Sanchez
Jose Santoyo
Glenda Savery
Kenneth Scheben
Emma Scheller
Larry Thurston
Diane Tucker
Robert Walker
Tracy Walker
Sharon Weinand And Frank Olsson
Erich Whiteford

Material Contract Counterparties

Fcpt Holdings, LLC

Continental Mills, Inc.

Kenneth O. Lester Company Inc. (Performance Food Groups)

Pepsi-Cola Advertising And Marketing, Inc.

Pepsico Sales, Inc.

Pfg Customized Distribution

Spirit Master Funding Ix, LLC

Non-Debtor Professionals

Alix Partners

Proskauer Rose LLP

Weil, Gotshal & Manges LLP

Sureties and Letter of Credit Beneficiaries

Aiken Electric Cooperative, Inc.	Clarksville Department Of Electricity
Alabama Power Company	Clay Electric Cooperative, Inc.
Arizona Public Service	Coast Electric Power Association
Baltimore Gas And Electric Company	College Station Utilities
Birmingham Water Works Board	Commissioner of Public Works
Bowling Green Municipal Utilities Bgmu	Coweta - Fayette Electric Membership Corporation
Brownsville Public Utilities Board	Decatur Utilities
Carroll Electric	Delmarva Power And Light Company
Central Arkansas Water	Duke Energy Carolinas, LLC
Central Florida Gas Company	Duke Energy Florida, Inc. Dba Duke Energy
City of Baytown	Duke Energy Ohio, Inc.
City of Bloomington	Duke Energy Progress, Inc.
City of Cartersville Water Dept.	Electric Power Board of Chattanooga
City of Clearwater	Electric Power Board of The Metropolitan Government of Nashville And Davidson County, Tennessee
City of Cookeville	Elizabethtown Gas
City of Decatur	Elk River Public Utility District
City of Dothan, Alabama	Emerald Coast Utilities Authority
City of East Point - (2777 East Point Street East Point, Ga 30344)	Florence Utilities, City of Florence, Alabama
City of Farmington	Florida Power & Light Company
City of Fayetteville	Florida Public Utilities
City of Fort Myers	Fort Pierce Utilities Authority
City of Fort Worth Water Department	Georgia Power Company
City of Houston, Public Works & Engineering Dept.	Greystone Power Corporation
City of Huntsville	Gulf Power Company
City of Huntsville, Alabama	Hartford Financial Services Group
City of Lake City Fl	Hillsborough County Public Utilities Department
City of Lakeland Florida	Jackson Electric Membership Corporation
City of Mesquite	Jackson Energy Authority
City of Oak Ridge Utilities Business Office	Jea, A Body Politic
City of Ocala	Jefferson County Dept of Revenue
City of Pasadena	Johnson City Power Board
City of Peru	Kansas City Power and Light
City of Richmond	Kansas Department of Revenue
City of Rocky Mount	
City of Tallahassee	
City of Winter Haven	

Kansas Gas Service	Sevier County Electric System, Sevierville, Tennessee
Kcmo Water Services Department	Sevier County Utility District (Scud), Tn
Kentucky Utilities Company	Shawnee Municipal Authority
Keyspan Gas East Corporation D/B/A National Grid	South Carolina Electric & Gas
Kissimmee Utility Authority	South Carolina Public Service Authority (Santee Cooper)
Kitchener-Wilmot Hydro Commission	Southeast Alabama Gas District
Knoxville Utilities Board	Southern California Edison
Lake Apopka Natural Gas District	Southwestern Electric Power Company / American Electric Power Co.
Lansing Board of Water & Light	State Of Mississippi
Las Vegas Valley Water District	State Of Nevada
Liberty Mutual Group	State Of Oklahoma
Liberty Utilities Georgia	State Of Oklahoma City Tax Commission
Long Island Lighting Company DbA Lipa	Sumter Electric Cooperative, Inc.
Louisville Gas and Electric	Syracuse Ny - Keyspan Gas East Corporation DbA National Grid Credit & Collection - 300 Erie
Manatee County Public Works	Tampa Electric Company
Marietta Board of Lights And Water	Teco Peoples Gas
Mishawaka Utilities	Tennessee Department of Revenue
Mississippi Power Company	Texas Gas Service, Tx
Mobile Gas Service Corporation	The Board of Water, Light and Sinking Fund Commissioners of The City Of Dalton DbA Dalton Utilities
Modesto Irrigation District	The Brooklyn Union Gas Company D/B/A National Grid Ny
Montgomery Water Works	The Empire District Company
Murfreesboro Electric Department	The Regional Municipality of Durham Travelers
Nebraska Public Power District	Tucson Electric Power Company
New York State Electric and Gas (Nyseg)	Tullahoma Utilities Board
North Little Rock Electric	Tupelo Water & Light Department
Oak Ridge Utility District - 120 S. Jefferson Circle - Oak Ridge Tn	Tucson Electric Power Company
Okaloosa County Gas District	UGI Utilities, Inc.
Orange County Utilities Service	U.S. Customs and Border Protection
Orlando Utilities Commission	Utah Department of Alcoholic Beverage Control
Pacific Gas and Electric Company	Village Of Bolingbrook
Peco An Exelon Company	
Portland General Electric Company	
Potomac Electric Power Company	
Puget Sound Energy	
Salt River Project Agricultural Improvement and Power District	
Sebring Gas System, Inc. Fl	

Village of Forsyth

Village of Orland Park

Virginia Electric and Power Company

Walton Emc And Walton Emc Natural Gas

Arthur Weigold

West Virginia Alcohol Beverage Control

Administration

Withlacoochee River Electric Cooperative,

Inc.

Wells Fargo Bank, N.A.

Unions

ED Food and Commercial Workers Canada Local 1006a

United Food and Commercial Workers of Canada

Utility Providers

Alabama Power
Ameren
Aps
Atmos Energy
Bp Energy Retail Company LLC
Centerpoint Energy
Century Link
Columbia Gas
Comcast
Con Edison
Consumers Energy
Direct Energy
DirecTV
Dominion Energy
Dominion Va/Nc Power
DTE Energy
Duke Energy
Dynegy Energy Services
Enbridge Gas Inc.
Energy Harbor
Entergy
FPL - Florida Power & Light Company
Georgia Power
GFL Environmental Inc.
Hudson Energy Canada Corp
Interconn Resources LLC
Pacific Gas & Electric
Pse&G-Public Service Elec & Gas Co.
PSEGLI
Shell Energy Solutions - Ca
Shell Energy Solutions Ne
Smartestenergy Us LLC
Southern California Edison
Southern California Gas (The Gas Co.)
Southwest Gas
Symmetry Energy Solution LLC
Teco: Peoples Gas
Waste Connections
Waste Management National Services Inc.
Xcel Energy

Bankruptcy Judges for the U.S. Bankruptcy Court for the Middle District of Florida
(Orlando Division)

Tiffany Geyer
Grace E. Robson
Lori V. Vaughn

U.S. Trustee's Office for Region 21

Audrey Aleskovsky

Michael W. Aponte

Scott E. Bomkamp

Bryan Buenaventura

Maureen E. Gimenez

Jill Kelso

Lori Luce

Robert Lynch

Allysan Mcguire-Gonzalez

Daniel Munoz

Donna Murray

Ana Rosa Rodriguez

Ileraine F. Salloum

Maxie Sellers

William J. Simonitsch

Patricia A. Sinclair

J. Leila Singh

Mary Ida Townson

Exhibit C

The Heeringa Declaration

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**
www.flmb.uscourts.gov

IN RE:

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC,

Case No. 6:24-bk-02486-GER

RED LOBSTER RESTAURANTS LLC,

Jointly Administered with

RLSV, INC.,

Case No. 6:24-bk-02487-GER

RED LOBSTER CANADA, INC.,

Case No. 6:24-bk-02488-GER

RED LOBSTER HOSPITALITY LLC,

Case No. 6:24-bk-02489-GER

RL KANSAS LLC,

Case No. 6:24-bk-02490-GER

RED LOBSTER SOURCING LLC,

Case No. 6:24-bk-02491-GER

RED LOBSTER SUPPLY LLC,

Case No. 6:24-bk-02492-GER

RL COLUMBIA LLC,

Case No. 6:24-bk-02493-GER

RL OF FREDERICK, INC.,

Case No. 6:24-bk-02494-GER

RED LOBSTER OF TEXAS, INC.,

Case No. 6:24-bk-02495-GER

RL MARYLAND, INC.,

Case No. 6:24-bk-02496-GER

RED LOBSTER OF BEL AIR, INC.,

Case No. 6:24-bk-02497-GER

RL SALISBURY, LLC,

Case No. 6:24-bk-02498-GER

RED LOBSTER INTERNATIONAL HOLDINGS LLC,

Case No. 6:24-bk-02499-GER

Case No. 6:24-bk-02500-GER

Debtors.

**DECLARATION OF JENNIFER HEERINGA IN SUPPORT OF THE
APPLICATION FOR THE EMPLOYMENT AND RETENTION OF PACK LAW, P.A. AS
LOCAL COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

I, Jennifer Heeringa, being duly sworn, depose and say, pursuant to 28 U.S.C. § 1746:

1. I am an authorized representative of the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned cases (the "Chapter 11 Cases").

2. I am North American Director of Credit of Gordon Food Service Canada Ltd., Co-Chair of the Committee, and I submit this declaration (this "Declaration") in support of the *Official Committee of Unsecured Creditors' Application for Entry of an Order Authorizing the Retention and Employment of Pack Law, P.A. as Local Counsel Effective as of June 4, 2024* (the

“Application”).¹ Except as otherwise noted, I have personal knowledge of the matters set forth herein.

Statement Pursuant to Revised UST Guidelines

3. I make the Declaration in a reasonable effort to comply with the U.S. Trustee’s requests for certain information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective As of November 1, 2013* (the “Revised UST Guidelines”).

4. The Committee recognizes that a comprehensive review process is necessary when selecting and managing chapter 11 professionals to ensure that bankruptcy professionals are subject to the same client-driven market forces, scrutiny, and accountability as professionals in non-bankruptcy engagements.

5. To that end, the review process utilized by the Committee here assessed potential professionals based on their expertise in the relevant professional issues and in similar proceedings. The Committee determined it should retain Pack Law because of its extensive experience in corporate reorganizations, both out-of-court and under chapter 11 of the Bankruptcy Code.

6. In my capacity as Co-Chair and authorized representative of the Committee, I am responsible, along with the other Committee members, for supervising counsel. Pack Law has informed the Committee that its rates are consistent between bankruptcy representations, including related transactional and litigation services. Pack Law has informed the Committee that its current hourly rates apply to non-bankruptcy services, if any, provided by Pack Law, unless a contingent

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

fee, mixed contingent fee, flat fee, or blended rate arrangement is agreed upon. Pack Law does not maintain separate departments devoted to other legal practices different from the bankruptcy and insolvency areas. Therefore, Pack Law does not have different billing rates and terms for non-bankruptcy engagements that can be compared to the billing rates and terms for the Committee's engagement of Pack Law.

7. The Committee will approve any prospective budget and staffing plan that may be filed by Pack Law prior to it being filed, recognizing that, in the course of large chapter 11 cases like these Chapter 11 Cases, it is possible that there may be a number of unforeseen fees and expenses that will need to be addressed by the Committee and Pack Law. The members of the Committee further recognize that it is their responsibility to monitor closely the billing practices of their counsel to ensure that the fees and expenses paid by the Debtors' estates remain consistent with the Committee's expectations and the exigencies of the Chapter 11 Cases. The Committee will continue to review the invoices that Pack Law regularly submits and will, together with Pack Law, periodically amend any budget and staffing plans as the Chapter 11 Cases develop.

8. The Committee will continue to bring discipline, predictability, client involvement, and accountability to the counsel fees and expenses reimbursement process. While every chapter 11 case is unique, the budgets will provide guidance on the periods of time involved and the level of the attorneys and professionals that will work on various matters, as well as projections of average hourly rates for the attorneys and professionals for various matters.

[Remainder of Page Intentionally Left Blank]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 3, 2024

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF RED LOBSTER MANAGEMENT LLC, *ET AL.***

By: /s/ Jennifer Heeringa
Jennifer Heeringa, North American Director of Credit
Gordon Food Service Canada Ltd.

acting solely in its capacity as Co-Chair of
the Official Committee of Unsecured Creditors
of Red Lobster Management, LLC, *et al.*