

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

In re:

Meier's Wine Cellars Acquisition, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11575 (MFW)

Re: Docket No. 953

**CERTIFICATION OF COUNSEL REGARDING LIQUIDATION TRUSTEE'S THIRD
OMNIBUS OBJECTION TO CLAIMS
(SUBSTANTIVE)
(Misclassified Claims)**

David P. Stapleton of The Stapleton Group, a part of J.S. Held, in his capacity as trustee (the "Liquidation Trustee") for the Meier's Wine Cellars Liquidation Trust (the "Liquidation Trust") in the above-captioned cases, by and through his undersigned counsel, hereby certifies:

1. On August 1, 2025, the Liquidation Trustee filed the *Third Omnibus Objection to Claims (Substantive)* [Docket No. 953] (the "Objection" or the "Third Omnibus Objection"), pursuant to §§ 105(a) and 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rules 3007(d) and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules").

2. Responses to the Objection were due by no later than August 15, 2025 at 4:00 p.m. (ET) (the "Response Deadline").

¹ The Debtors are the following twelve entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Meier's Wine Cellars Acquisition, LLC (5557); California Cider Co., Inc. (0443); Girard Winery LLC (5076); Grove Acquisition, LLC (9465); Meier's Wine Cellars, Inc. (2300); Mildara Blass Inc. (1491); Sabotage Wine Company, LLC (8393); Splinter Group Napa, LLC (1417); Thames America Trading Company Ltd. (0696); Vinesse, LLC (3139); Vintage Wine Estates, Inc. (CA) (2279); and Vintage Wine Estates, Inc. (NV) (5902). The Debtors' noticing address in these chapter 11 cases is 205 Concourse Boulevard, Santa Rosa, California 95403.

3. On August 14, 2025, Carlo Cavallo filed his *Response to the Third Omnibus Objection to Claims (Substantive)* [Docket No. 960], objecting to the Liquidation Trustee's reclassification of his claim (the "Response"). The Liquidation Trustee contacted Mr. Cavallo regarding his filed response and the parties have agreed to adjourn the hearing on the Objection and Response to the next omnibus hearing. Accordingly, the Liquidating Trustee has removed the claim of Mr. Cavallo from the Revised Proposed Order (defined herein).

4. Attached hereto as **Exhibit A** is the revised proposed order (the "Revised Proposed Order").

5. Attached hereto as **Exhibit B** is a blackline of the Revised Proposed Order compared against the proposed order originally filed with the Objection.

6. Accordingly, it is hereby respectfully requested that the Revised Proposed Order, attached hereto as **Exhibit A**, be entered by the Court.

7. The Liquidation Trustee reserves the right to object to the aforementioned proof of claim on any other grounds that the Liquidation Trustee discovers or elects to pursue.

Dated: September 2, 2025
Wilmington, Delaware

FOX ROTHSCHILD LLP

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Counsel to the Liquidation Trustee

Exhibit “A”

Exhibit “B”

Exhibit “A”

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

In re:

Meier's Wine Cellars Acquisition, LLC, *et al.*,
Debtors.¹

Chapter 11

Case No. 24-11575 (MFW)

(Jointly Administered)

Re: Docket No. ____

**ORDER GRANTING LIQUIDATION TRUSTEE'S THIRD
OMNIBUS OBJECTION TO CLAIMS
(SUBSTANTIVE)
(Misclassified Claims)**

Upon the *Liquidation Trustee's Third Omnibus Objection to Claims (Substantive)* (the "Objection") for entry of an order modifying and reclassifying the claims (each a "Claim" and collectively, the "Claims") set forth on **Schedule 1** attached hereto and made a part hereof (the "Schedule"), all as more fully set forth in the Objection; and upon the *Declaration of David P. Stapleton Pursuant to 28 U.S.C. § 1746 and Local Rule 3007-1 in Support of the Liquidation Trustee's Third Omnibus Objection to Claims (Substantive)* filed contemporaneously with the Objection and in support thereof; and this Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Objection and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and

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proper notice of the Objection having been provided, and no other or further notice being required; and the Court having considered all responses to the Objection, if any, and all such responses having been either overruled or withdrawn; and upon all proceedings had before the Court; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and

This Court having **FOUND AND DETERMINED THAT:**

A. The holders of the Claims listed on the Schedule were properly and timely served with a copy of the Objection and all of its accompanying exhibits and Schedules and notice of the hearing on the Objection and response deadline,

B. Any entity known to have an interest in the Claims has been afforded reasonable opportunity to respond to, or be heard regarding, the relief requested in the Objection, and

C. The relief requested in the Objection is in the best interests of the Debtors, their estates, their creditors, and other parties in interest;

And after due deliberation and sufficient cause appearing therefor,

IT IS THEREFORE ORDERED THAT:

1. The Objection² is **GRANTED**.
2. The Misclassified Claims listed on **Schedule 1** are hereby modified and reclassified as reflected on **Schedule 1**.
3. Epiq Corporate Restructuring LLC is authorized and directed to update the Claims Register as necessary to reflect the terms of this Order.
4. Each Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect

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

to each Claim. Any stay of this Order pending appeal by any holder of a Claim whose Claims are subject to this Order shall apply only to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to other contested matters covered hereby.

5. Nothing in the Objection or this Order shall be construed as an allowance of any Claim.

6. The Liquidation Trustee's right to amend, modify, or supplement the Objection, to file additional objections to the Claims or any other claims (filed or not) which have or may be asserted against the Debtors, and to seek reduction of any Claim, are preserved. Additionally, should one or more of the grounds of objection stated in the Objection be dismissed, the Liquidation Trustee's right to object on other stated grounds or any other grounds that the Liquidation Trustee discovers during the pendency of these cases are further preserved.

7. This Court shall retain jurisdiction to hear and determine all matters arising from the interpretation and/or implementation of this Order.

Claimant Name and Address	Claim Date	Debtor	Claim No.	Asserted Claim Amount and Classification	Modified Claim Amount and Classification	Reason for Modification
ALSCO INC 3311 INDUSTRIAL DR SANTA ROSA, CA 95403	8/19/2024	Vintage Wine Estates, Inc. (CA)	10072	\$1,077.61 Admin Priority \$6,639.76 General Unsecured	\$7,717.37 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim is based on linen rentals for tasting rooms, not the sale of goods.
AMERICAN FRUIT AND FLAVORS LLC 510 PARK AVE SAN FERNANDO, CA 91340	11/7/2024	Vintage Wine Estates, Inc. (CA)	10280	\$18,048.17 Admin Priority	\$18,048.17 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim relates to the sale of goods in April 2024, not within 20 days of the commencement of the case.
BAMKO LLC 10925 WEYBURN AVE LOS ANGELES, CA 90024	10/18/2024	Vintage Wine Estates, Inc. (CA)	10182	\$1,050.00 Admin Priority	\$1,050.00 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim relates to the sale of goods in November 2023, not within 20 days of the commencement of the case.
BAT CITY DIGITAL ATTN CRAIG HARPER 1710 BRIAR ST AUSTIN, TX 78704-3422	10/23/2024	Vintage Wine Estates, Inc. (CA)	10189	\$55,000.00 Admin Priority	\$55,000.00 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim relates to transactions not within 20 days of the commencement of the case. Additionally, the claim is based on digital marketing services, not the sale of goods.
BAZAARVOICE INC ATTN BANKRUPTCY DEPARTMENT 10901 STONELAKE BLVD AUSTIN, TX 78759	10/3/2024	Vintage Wine Estates, Inc. (CA)	10150	\$18,892.78 Admin Priority	\$18,892.78 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim relates to transactions in September 2023, not within 20 days of the commencement of the case. Additionally, the claim is based on marketing services, not the sale of goods.
BNT MEDIA ATTN BIORN TANGELAND 2740 MENDOZA DR COSTA MESA, CA 92626	9/17/2024	Vinesse, LLC	10124	\$5,250.00 Admin Priority	\$5,250.00 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim is based on web services, not the sale of goods.
CUREBIT INC D/B/A TALKABLE 2261 MARKET ST, #4588 SAN FRANCISCO, CA 94114	8/15/2024	Vintage Wine Estates, Inc. (CA)	10060	\$7,500.00 Admin Priority	\$7,500.00 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim relates to transactions between February and April 2024, not within 20 days of the commencement of the case. Additionally, the claim is based on marketing services, not the sale of goods.
ENAVATE INC PO BOX 736741 DALLAS, TX 75373-6741	11/6/2024	Vintage Wine Estates, Inc. (CA)	10265	\$21,299.15 Admin Priority	\$21,299.15 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim relates to a transaction in June 2024, not within 20 days of the commencement of the case. Additionally, the claim is based on software support services, not the sale of goods.
EULER HERMES NA - AGENT FOR EXODUS LOGI 100 INTERNATIONAL DR, 22ND FL BALTIMORE, MD 21202	10/2/2024	Vintage Wine Estates, Inc. (CA)	10148	\$15,689.00 Admin Priority \$110,160.00 General Unsecured	\$125,849.00 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim is based on freight and logistics fees, not for the sale of goods.
PACIFIC SERVICES ENTERPRISES 610 CORTYE MORENO ROHNERT PARK, CA 94928	11/20/2024	Vintage Wine Estates, Inc. (CA)	10332	\$8,640.00 Admin Priority	\$8,640.00 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim relates to transactions on and prior to June 28, 2024, not within 20 days of the commencement of the case. Additionally, the claim is based on services, not the sale of goods.
PLH WINE AND SPIRITS CO LLC 1513 TAM O SHANTER DR SOUTH LAKE TAHOE, CA 96150	9/6/2024	Vintage Wine Estates, Inc. (CA)	10113	\$59,980.00 Admin Priority	\$59,980.00 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim relates to transactions in April 2024, not within 20 days of the commencement of the case. Additionally, the claim is based on trade commissions and consulting services, not the sale of goods.
VISTA BROADBAND NETWORKS 3700 OLD REDWOOD HWY, #205 SANTA ROSA, CA 95403-5738	10/22/2024	Vintage Wine Estates, Inc. (CA)	61	\$17,495.00 Admin Priority	\$5,965.00 General Unsecured	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim is for services and not the sale of goods. Additionally, the as filed proof of claim is overstated per the Debtors' books and records and has been adjusted accordingly.

Exhibit “B”

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

In re:

Meier's Wine Cellars Acquisition, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11575 (MFW)
Jointly Administered

Related to D.I.

**ORDER GRANTING LIQUIDATION TRUSTEE'S MOTION FOR AN ORDER
EXTENDING THE DEADLINE FOR FILING OBJECTIONS TO CLAIMS**

Upon the motion (the "Motion") of David P. Stapleton of the Stapleton Group, a part of J.S. Held, in his capacity as the Liquidation Trustee (the "Liquidation Trustee") for the Meier's Wine Cellars Liquidation Trust (the "Liquidation Trust"), as successor-in-interest to Meier's Wine Cellars Acquisition, LLC, and its affiliated debtors (collectively, the "Debtors") in the above-captioned chapter 11 cases, for entry of an order pursuant to Article VI.B.3 of the Plan² and Rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), extending the deadline for the Liquidation Trustee and any other party in interest to the extent permitted under section 502(a) of the Bankruptcy Code to object to claims (the "Claims Objection Bar Date"); and it appearing that the Court has jurisdiction over this matter; and it appearing that notice of the Motion as set forth therein is sufficient, and that no other or further notice need be provided; and

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it further appearing that the relief requested in the Motion is in the best interests of the Debtors and their creditors; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Motion be, and hereby is, GRANTED; and it is further

ORDERED that the Claims Objection Deadline is hereby extended to and including **February 23, 2026**, without prejudice to the Liquidation Trustee's right to seek further extensions; and it is further

ORDERED that this Court shall, and hereby does, retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

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Schedule 1

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CHEF- CARLO- CAVALLLO- 400-1ST- STE- SONOMA-, CA-95476	9/22/2024	Vintage- Wine- Estates-, Inc. (CA)	10136	\$47,072.50 Admin- Priority- General- Unsecured	\$47,072.50	Claimant is not entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code because the claim relates to transactions in April and May 2024, not within 20 days of the commencement of the case.
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