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**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:

INSPIRED HEALTHCARE CAPITAL
HOLDINGS, LLC, *et al.*¹

Debtors.

)
) Chapter 11
)
) Case No. 26-90004 (MXM)
)
) (Jointly Administered)
)
)
)

**DEBTORS' SECOND MOTION FOR ENTRY OF ORDER
(I) EXTENDING DEADLINE TO ASSUME OR REJECT
UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY
PURSUANT TO 11 U.S.C. § 365(d)(4) AND (II) GRANTING RELATED RELIEF.**

¹ The last four digits of Inspired Healthcare Capital Holdings, LLC's federal tax identification number are 6696. There are 161 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/InspiredHealthcare>. The Debtors' mailing address is 7033 East Greenway Parkway, Suite 250, Scottsdale, AZ 85254.

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT [HTTPS://ECF.TXNB.USCOURTS.GOV/](https://ecf.txnb.uscourts.gov/) NO MORE THAN TWENTY-FOUR (24) DAYS AFTER THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK AND FILED ON THE DOCKET NO MORE THAN TWENTY-FOUR (24) DAYS AFTER THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

A HEARING WILL BE CONDUCTED ON THIS MATTER ON AUGUST 27 AT 2:30 P.M. IN ROOM 128, U.S. COURTHOUSE, 501 W. TENTH STREET, FORT WORTH, TEXAS, 76102.

YOU MAY PARTICIPATE IN THE HEARING EITHER IN PERSON OR BY AN AUDIO AND VIDEO CONNECTION.

AUDIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT 1-650-479-3207, MEETING ID: 2310-650-8783. VIDEO COMMUNICATION WILL BE BY THE USE OF THE CISCO WEBEX PLATFORM. CONNECT VIA THE CISCO WEBEX APPLICATION OR CLICK THE LINK ON JUDGE MULLIN'S HOME PAGE. CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING.

Inspired Healthcare Capital Holdings, LLC ("Holdings") and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), hereby file this motion (the "Motion") for entry of an order, substantially in the form attached hereto as Exhibit A (the "Proposed Order"), granting the relief described below. In support thereof, the Debtors respectfully represent as follows:

RELIEF REQUESTED

1. By the Motion, the Debtors respectfully request entry of the Proposed Order, further extending the period (the "365(d)(4) Period") within which the Debtors may assume or reject nonresidential real property leases, subleases, and other agreements under which any of the Debtors is a lessee and that may be considered unexpired leases of non-residential real property under applicable law (collectively, the "Real Property Leases") by 90 days, through and including November 30, 2026, without prejudice to the Debtors' right to seek further extension(s). Pursuant to the *Order (I) Extending Deadline to Assume or Reject Unexpired Leases of Nonresidential Real*

Property Pursuant to 11 U.S.C. § 365(d)(4) and (II) Granting Related Relief [Docket No. 753] entered on June 2, 2026 (the “First 365(d)(4) Order”), the Court previously extended the 365(d)(4) Period through August 31, 2026. Without the requested further extension, the 365(d)(4) Period will expire on August 31, 2026, prior to the conclusion of the Debtors' sale process.²

JURISDICTION AND VENUE

2. The Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc* dated August 3, 1984, entered by the United States District Court for the Northern District of Texas. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

3. The legal predicates for the relief requested herein are sections 105(a) and 365(d)(4) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 6006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 7007-1 of the *Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas* (the “Local Rules”), and the *Procedures for Complex Cases in the Northern District of Texas*, effective February 6, 2023 (the “Complex Case Procedures”).³

² For the avoidance of doubt, nothing in this Motion or Proposed Order shall constitute or be deemed an admission or determination that any particular Real Property Lease constitutes a non-residential real property lease within the meaning of section 365(d)(4) of the Bankruptcy Code.

³ Section N of the Complex Case Procedures (as defined below) provides that, unless otherwise specified in the Bankruptcy Code, Bankruptcy Rules, Local Rules, or Court order, the time for taking any action before the expiration of the period prescribed by the Bankruptcy Code, Bankruptcy Rules, or Local Rules is automatically extended until the Court rules on the motion. Such automatic extension under Section N does not require the issuance or entry of an order extending the time. The hearing on this Motion is set for August 27, 2026, four days prior to the expiration of the 365(d)(4) Period on August 31, 2026. In the case of such hearing being adjourned, Section N shall bridge the 365(d)(4) Period until the Court can provide ruling on this Motion

4. The Debtors confirm their consent to the entry of a final order by the Court in connection with the Motion in the event that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

BACKGROUND

I. The Chapter 11 Cases

5. On February 2, 2026 (the “Petition Date”), each Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”) in the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division (the “Court”). These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1. The Debtors continue to operate their businesses and manage their properties as debtors and debtors-in-possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

6. On February 25, 2026, the Office of the United States Trustee for Region 6 (the “U.S. Trustee”) appointed an official committee of unsecured creditors (the “Committee”) in these Chapter 11 Cases. *See* Docket No.161. To date, no trustee or examiner has been appointed.

7. Additional information regarding the Debtors and these Chapter 11 Cases, including the Debtors’ business operations, capital structure, financial condition, and the reasons for and objectives of these Chapter 11 Cases, is set forth in the *Declaration of M. Benjamin Jones in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 33] (the “First Day Declaration”).

II. Lease Rejections to Date

8. On the Petition Date, the Debtors filed the *Debtors' Motion for Entry of Order (I) Authorizing the Debtors to (A) Reject Certain Unexpired Real Property Leases and (B) Abandon Certain Personal Property, Effective as of the Petition Date, and (II) Granting Related Relief* [Docket No. 14], seeking authority to reject certain unexpired real property leases for office space no longer needed for the Debtors' operations and therefore not involved in the Debtors' sale process. On March 23, 2026, the Court entered the order approving the rejection of such leases. See Docket No. 329.

III. The Debtors' Sale Process

9. On February 6, 2026, the Debtors filed the *Debtors' Motion for the Entry of an Order (I) Establishing Bid Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Authorizing the Debtors to Enter Into a Stalking Horse Agreement and Provide Bid Protections, (IV) Approving the Form and Manner of Notice Thereof, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases and (VI) Granting Related Relief* [Docket No. 99], seeking approval to implement procedures to govern their postpetition sale and marketing process.

10. On April 13, 2026, the Court entered the *Order Granting Debtors' Motion for the Entry of an Order (I) Establishing Bid Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Authorizing the Debtors to Enter Into a Stalking Horse Agreement and Provide Bid Protections, (IV) Approving the Form and Manner of Notice Thereof, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases and (VI) Granting Related Relief* [Docket No. 465], which, among other things, authorized the Debtors to conduct an orderly marketing and sale process for substantially all of their assets.

11. The Debtors' sale process remains ongoing. In furtherance of the sale process, the Debtors have designated multiple stalking horse bidders in accordance with the Bidding Procedures Order. Specifically, the Debtors have designated multiple stalking horse bidders in accordance with the Bid Procedures Order, filing the following notices of stalking horse designation: (a) *Notice of Designation of Stalking Horse Bidder for (A) Teal Shores (Mequon) and (B) Ballard Glenn (Appleton)* [Docket No. 1068]; (b) *Notice of Designation of Stalking Horse Bidder for (A) Mariella of Reno, (B) Thrive at Augusta, and (C) Augusta Vacant Land* [Docket No. 1069]; (c) *Notice of Designation of Stalking Horse Bidder for (A) Salterra at Las Vegas, (B) The Archer Senior Living at Crescent Park, and (C) Mariella of Grapevine* [Docket No. 1070]; (d) *Notice of Designation of Stalking Horse Bidder for Harbor at Harmony Crossing (Eatonton)* [Docket No. 1071]; (e) *Notice of Designation of Stalking Horse Bidder for (A) Orchard at Brookhaven, (B) Orchard at Athens, and (C) Mariella of Arlington Heights* [Docket No. 1076]; (f) *Notice of Designation of Stalking Horse Bidder for Mariella of Lake Orion and Salterra at Chesterfield* [Docket No. 1090]; (g) *Notice of Designation of Stalking Horse Bidder for Salterra at Ashbrook (Villa Rica, GA)* [Docket No. 1091]; and (h) *Notice of Designation of Stalking Horse Bidder for Carson Valley* [Docket No. 1178]; and (i) *Notice of Designation of Stalking Horse Bidder for (A) Azalea at Delray Beach, (B) Salterra Senior Living at Dunedin, (C) Salterra Senior Living at Fort Myers, (D) Salterra Senior Living at Melbourne, (E) Salterra Senior Living at Largo, and (F) Salterra Senior Living at Pinellas Park* [Docket No. 1181]. This process remains ongoing, and the Debtors intend to designate stalking horse bidders for additional assets. The Debtors anticipate that they will receive multiple bids on or prior to the bid deadline and will subsequently convene an auction. Because any sale closing post-Court approval will occur several weeks after the auction, the Debtors and successful bidder(s) will need additional time after the

expiration of the 365(d)(4) Period (which currently expires on August 31, 2026) to determine whether they intend to assume any of the Real Property Leases. The Debtors file this Motion out of an abundance of caution and reserve all rights as it relates to the Real Property Leases, including to argue that they are residential real property leases.

BASIS FOR RELIEF

12. Pursuant to Bankruptcy Code section 365(d)(4), debtors have an initial 120-day period following the filing of a bankruptcy petition in which to elect to assume or reject unexpired leases of non-residential real property under which any of the debtors is a lessee. *See* 11 U.S.C. § 365(d)(4)(A). Bankruptcy Code section 365(d)(4)(B) provides, however, that, upon a motion by the debtors, the Court may extend the initial 120-day deadline by ninety (90) days “for cause.” 11 U.S.C. § 365(d)(4)(B). Any subsequent extensions of the deadline to assume or reject unexpired leases of non-residential real property under which any of the debtors is a lessee may only be granted with the prior written consent of the affected lessors. *See id.* § 365(d)(4)(B)(ii). Under Bankruptcy Code section 365(d)(4), if the debtors fail to assume or reject an unexpired lease of non-residential real property under which any of the debtors is a lessee prior to the applicable deadline, such lease will automatically be deemed rejected. *See id.* § 365(d)(4)(A).

13. The term “cause” is not defined in Bankruptcy Code section 365(d)(4). As such, courts have considered several factors in determining whether cause exists for an extension of the section 365(d)(4) deadline, including:

- (a) whether the debtor is paying for the use of the property;
- (b) whether the debtor’s continued occupation could damage the lessors beyond compensation available to it under the Bankruptcy Code;
- (c) whether the lease is the debtor’s primary asset;

- (d) whether the debtor has had sufficient time to formulate a plan of reorganization;
- (e) the complexity of the case facing the debtor; and
- (f) the number of leases that the debtor must evaluate.

See In re Panaco, Inc., Case No. 02-37811-H3-11, 2002 WL 31990368, *5 (Bankr. S.D. Tex. Dec. 10, 2002) (citing *S. St. Seaport Ltd. P'ship v. Burger Boys, Inc. (In re Burger Boys, Inc.)*, 94 F.3d 755, 760-61 (2d Cir. 1996)); *In re Serv. Merch. Co., Inc.*, 256 B.R. 744, 748 (M.D. Tenn. 2000); *In re Wedtech Corp.*, 72 B.R. 464, 471–73 (Bankr. S.D.N.Y. 1987); *Vt. Partners, Ltd. v. Thaler (In re Poseidon Pool & Spa Recreational, Inc.)*, 377 B.R. 52, 61 (E.D.N.Y. 2007). “This list is not exclusive, and a great deal of discretion is left to the court to weigh all relevant factors related to the requested extension.” *Serv. Merch.*, 256 B.R. at 748 (citing *In re Ernst Home Center, Inc.*, 221 B.R. 243 (9th Cir. BAP 1998)); *see also In re Burger Boys, Inc.*, 94 F.3d at 761.

14. Here, the Debtors submit that ample cause exists to extend the 365(d)(4) Period as requested herein. *First*, these Chapter 11 Cases are large and complex and involve several Real Property Leases, which are valuable and vital assets of the estates. Because of the complexity of these cases, the Debtors have not had sufficient time to evaluate all their Real Property Leases and determine whether certain of them will be needed on a go-forward basis. The Chapter 11 Cases have been pending for approximately five months, during which time the Debtors have worked diligently on several time-sensitive matters to ensure a smooth transition into chapter 11 and to preserve and maximize the value of the Debtors’ estates for the benefit of all stakeholders. To that end, the Debtors have, among other things: (a) ensured a smooth transition into chapter 11 with minimal disruption to the Debtors’ operations, including by obtaining Court approval of certain first and second day motions; (b) negotiated and obtained Court approval of debtor-in-possession financing and bid procedures; (c) addressed complicated issues in connection with the Debtors’

Delaware Statutory Trust entities including the appropriate method by which to allocate the costs associated with administering these Chapter 11 Cases; (d) prepared and filed Schedules of Assets and Liabilities and Statements of Financial Affairs for each of the 161 Debtor entities; (e) responded to numerous and extensive discovery requests from various parties, including the Committees and lenders who assert liens in certain of the Debtors' real property, and others; and (f) administered a value-maximizing marketing and sale process for substantially all of the Debtors' assets. As evidenced by the foregoing, the Debtors have labored to preserve and maximize the value of the Debtors' estates for the benefit of all stakeholders since these cases commenced, particularly given their ongoing sale process, and continue to do so, justifying an extension of the 365(d)(4) Period.

15. *Second*, in the absence of a further extension of the 365(d)(4) Period, it is possible that the Debtors would be prematurely forced to assume or reject certain Real Property Leases if they were determined to be non-residential real property leases before (a) the conclusion of their ongoing sale process, (b) mediation efforts with the Debtors' key stakeholders, and (c) their proposed chapter 11 plan is filed.⁴ Such premature assumption or rejection could give rise to unnecessary administrative expense claims against the Debtors' estates, jeopardize the Debtors' ability to successfully prosecute these Chapter 11 Cases, or, at a minimum, prevent any successful bidder from making their own decisions regarding assumption and assignment of any Real Property Leases. The Debtors' sale efforts are designed to continue the operation of the assets in the ordinary course, which would benefit lessors (who are also debtors) of the Real Property Leases

⁴ As the sale process continues, the Debtors are simultaneously developing a framework that will serve as the basis for a proposed chapter 11 plan or plans and intend to work with key stakeholders and parties-in-interest to subsequently refine, file, solicit and confirm the same. Contemporaneously herewith, the Debtors are filing a second motion to extend their exclusive periods for the filing and solicitation of a chapter 11 plan.

(collectively, the “Lessors”) subject to the extension of the 365(d)(4) Period. Any failure to grant the extension would require the rejection of the Real Property Leases, which would inhibit the Debtors’ ability to preserve the going-concern value of the assets being sold, may create negative consequences for the applicable Lessors, and may also jeopardize continuity of care to the Debtors’ residents and employee retention, as the Debtors would be forced to quickly transition the facilities to new operators following such rejection. The extension of the 365(d)(4) Period requested herein will decrease the risk of such negative outcomes for the Debtors’ estates and will therefore benefit all stakeholders.

16. *Third*, the Debtors are paying their administrative obligations as they become due and owing.

17. *Finally*, the requested extension of the 365(d)(4) Period is consistent with the goals of the Bankruptcy Code and will not unduly prejudice any Lessors. Pending their election to assume or reject any Real Property Leases (which will inherently be informed by any successful bidder’s decisions regarding the same) that have not otherwise been slated for rejection, the Debtors will perform their undisputed obligations arising from and after the Petition Date in a timely fashion and as required by the Bankruptcy Code. As a result, the requested extension will afford the Debtors the opportunity to preserve and maximize estate value, without prejudicing the rights of the Lessors, and will allow any purchaser sufficient time to make decisions regarding assumption and assignment of any Real Property Leases.

18. For the reasons set forth above, the Debtors submit that the circumstances in these Chapter 11 Cases warrant the requested extension of the 365(d)(4) Period for an additional 90 days through and including November 30, 2026.

NOTICE

19. The Debtors will provide notice of the Motion to: (a) the U.S. Trustee; (b) the Internal Revenue Service; (c) the United States Attorney for the Northern District of Texas; (d) the Attorney General for the State of Texas; (e) the State Comptroller of Public Accounts; (f) the Centers for Medicare and Medicaid Services; (g) the United States Attorney General; (h) the Attorneys General for the states in which the Debtors conduct business; (i) counsel to the Committees; (j) counsel to the Debtors' prepetition lenders; (k) counsel to the DIP Lender; and (l) all parties entitled to notice pursuant to Bankruptcy Rule 2002. The Debtors submit that no other or further notice is required.

RESERVATION OF RIGHTS

20. Nothing in this Motion or Proposed Order shall constitute or be deemed an admission or determination that any particular Real Property Lease constitutes a non-residential real property lease within the meaning of section 365(d)(4) of the Bankruptcy Code and the Debtors reserve all rights thereto.

NO PRIOR REQUEST

21. On May 1, 2026, the Debtors filed the Debtors' Motion for Entry of Order (I) Extending Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to 11 U.S.C. § 365(d)(4) and (II) Granting Related Relief [Docket No. 553] (the "First 365(d)(4) Motion"), seeking a 90-day extension of the 365(d)(4) Period through and including August 31, 2026. On June 2, 2026, the Court entered the Order [Docket No. 753] (the "First 365(d)(4) Order") granting the First 365(d)(4) Motion and extending the 365(d)(4) Period through and including August 31, 2026. This is the Debtors' second request for an extension of the 365(d)(4) Period.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as may be just and proper.

Dated: July 23, 2026
Dallas, Texas

DECHERT LLP

/s/ Jack G. Haake

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Counsel to the Debtors and Debtors-in-Possession

CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing Motion was served by the Court's CM/ECF system on all counsel of record registered in these Chapter 11 Cases through CM/ECF. The Debtors' claims and noticing agent will be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing Motion.

Dated: July 23, 2026
Dallas, Texas

DECHERT LLP

/s/ Jack G. Haake

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:

INSPIRED HEALTHCARE CAPITAL
HOLDINGS, LLC, *et al.*¹

Debtors.

)
) Chapter 11
)
) Case No. 26-90004 (MXM)
)
) (Jointly Administered)
)
) Related to Docket No. ____
)

**ORDER (I) EXTENDING DEADLINE TO ASSUME OR REJECT UNEXPIRED
LEASES OF NONRESIDENTIAL REAL PROPERTY PURSUANT TO
11 U.S.C. § 365(d)(4) AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)² of the Debtors for entry of an order (this “Order”), extending, through November 30, 2026, the Debtors’ deadline to assume or reject the Real Property Leases pursuant to Bankruptcy Code section 365(d)(4), all as more fully set forth in the Motion; and upon consideration of the First Day Declaration; and the Court having jurisdiction

¹ The last four digits of Inspired Healthcare Capital Holdings, LLC’s federal tax identification number are 6696. There are 161 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/InspiredHealthcare>. The Debtors’ mailing address is 7033 East Greenway Parkway, Suite 250, Scottsdale, AZ 85254.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc* dated August 3, 1984, entered by the United States District Court for the Northern District of Texas; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion having been given under the particular circumstances; and the Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the “Hearing”); and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The Motion is granted as set forth herein.
2. Pursuant to Bankruptcy Code section 365(d)(4), the deadline for the Debtors to assume or reject any Real Property Leases is hereby extended through and including November 30, 2026 (the “365(d)(4) Period”).
3. This Order shall be without prejudice to the Debtors’ rights to seek further extensions of the 365(d)(4) Period with the consent of any affected Lessors.
4. Nothing in this Order shall constitute or be deemed an admission or determination that any particular Real Property Lease constitutes a non-residential real property lease within the

meaning of section 365(d)(4) of the Bankruptcy Code , and the Debtors expressly reserve all rights with respect thereto.

5. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a), the Local Rules, and the Complex Case Procedures are satisfied by such notice.

6. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

7. The Debtors are authorized to take all actions necessary to implement the relief granted in this Order.

8. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

END OF ORDER

Prepared and presented by:

DECHERT LLP

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