

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

In re:)	Chapter 11
)	Case No. 19-12415 (MFW)
HRI HOLDING CORP., <i>et al.</i> ,)	
)	Re: Docket No. 908
Debtors.)	

**RESPONSE OF IHAB SULAIMAN TO DEBTORS' FIRST OMNIBUS OBJECTION
(SUBSTANTIVE) OF PLAN ADMINISTRATOR TO CERTAIN PROOFS OF CLAIM**

COMES NOW, Ihab Sulaiman ("Sulaiman"), by and through the undersigned counsel, and hereby responds to the *Debtors' First Omnibus Objection (Substantive) of Plan Administrator to Certain Proofs of Claim* [Docket No. 908] (the "Objection"), and states as follows:

1. Sulaiman filed the following two (2) proofs of claim on March 23, 2020: (1) Proof of Claim No. 398 for an unliquidated amount regarding HRI Holdings Corp. ("POC 398"); and, (2) Proof of Claim No. 399 for an unliquidated amount regarding Houlihan's Restaurants, Inc. ("POC 399"). POC 398 and POC 399 are hereinafter collectively referred to as the "POCs".

2. On April 14, 2020, Sulaiman filed a motion for relief from the automatic stay for the limited purpose of continuing the Personal Injury Claim¹ to adjudicate Debtors' liability in connection with the injuries and damages sustained by Sulaiman to judgment or settlement [Docket No. 576] (the "Motion").

3. Debtors and Sulaiman entered into a consent order regarding the Motion which was entered by the Court on May 22, 2020 [Docket No. 627] (the "Consent Order"). The Consent Order allowed Sulaiman to continue with his Personal Injury Claim in state court.

4. On May 31, 2022, Debtors filed the Objection stating the POCs were unliquidated and there was no support for such claim.

¹ Capitalized terms used herein but not otherwise defined have the meaning ascribed to them in the Motion.



5. The Personal Injury Claim is currently in active litigation (mediation was recently completed without a settlement) and it is respectfully requested that the Objection be held in abeyance until the state court claims can be liquidated and covered by applicable insurance proceeds.

WHEREFORE, based on the foregoing, Sulaiman respectfully requests that the Objection be held in abeyance until the Personal Injury Claim is liquidated.

Dated: June 29, 2022

/s/ Garvan F. McDaniel
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Attorney for Sulaiman

CERTIFICATE OF SERVICE

I, Garvan McDaniel, hereby certify that on June 29, 2022, I caused a copy of the foregoing to be served upon all parties registered for service via CM/ECF.

/s/ Garvan McDaniel

Garvan McDaniel (#4167)