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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re

FILENE'S BASEMENT, LLC, et al.,¹

Reorganized Debtors.

Chapter 11

Case No. 11-13511 (CSS)

RE: D.I. 3457

CERTIFICATION OF NO OBJECTION REGARDING THE REORGANIZED DEBTORS' MOTION, PURSUANT TO 11 U.S.C. §§ 105, 350, AND 1142 FOR ENTRY OF A FINAL DECREE CLOSING THE CHAPTER 11 CASE OF FILENE'S <u>BASEMENT LLC</u>

The undersigned hereby certifies that, as of the date hereof, Morris, Nichols, Arsht & Tunnell LLP ("<u>Morris Nichols</u>") has received no answer, objection or other responsive pleading to the *Reorganized Debtors' Motion, Pursuant to 11 U.S.C. §§ 105, 350, and 1142 for Entry of a Final Decree Closing the Chapter 11 Case of Filene's Basement LLC* (the "<u>Motion</u>") (D.I. 3457), filed on November 4, 2020.

The undersigned further certifies that Morris Nichols has reviewed the Court's docket in this case and that no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the notice of the Motion, objections to the Motion were to be filed and served no later than November 18, 2020 at 4:00 pm (ET) (the "<u>Objection Deadline</u>").

WHEREFORE, the Reorganized Debtors respectfully request that the Order attached to the Motion be entered at the earliest convenience of the Court.

¹ The Reorganized Debtors and the last four digits of their respective taxpayer identification numbers are as follows Filene's Basement, LLC (8277), Syms Corp. (5228), Syms Clothing, Inc. (3869), and Syms Advertising Inc. (5234). The Reorganized Debtors' address is 340 Madison Avenue, New York, NY 10173.



Dated: December 15, 2020 Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Tammy K. Mann Robert J. Dehney (No. 3578) Curtis Miller (No. 4853) Tamara K. Mann (No. 5643) Sarah Simonetti (No. 6698) 1201 North Market Street, 16th Floor P.O. Box 1347 Wilmington, Delaware 19899-1347 Telephone: (302) 658-9200 Facsimile: (302) 658-9200 Facsimile: (302) 658-3989 Email: rdehney@mnat.com cmiller@mnat.com tmann@mnat.com ssimonetti@mnat.com *Counsel to the Reorganized Debtors*