

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

In re:

HRI HOLDING CORP., *et al.*¹

Debtors.

Chapter 11

Case No. 19-12415 (MFW)

(Jointly Administered)

Hearing Date: November 30, 2021 at 11:30 am (ET)

Objection Deadline: November 12, 2021 at 4:00 pm (ET)

**PLAN ADMINISTRATOR'S MOTION FOR ENTRY OF A FINAL DECREE CLOSING
CERTAIN OF THE DEBTORS' CHAPTER 11 CASES**

Saccullo Business Consulting, LLC, as plan administrator (the "Plan Administrator") in the chapter 11 cases of the above-captioned debtors (collectively, the "Debtors"), hereby submits this motion (this "Motion") for entry of a final decree and order by the United States Bankruptcy Court for the District of Delaware (the "Court"), substantially in the form attached hereto as Exhibit A (the "Proposed Final Decree"), (i) closing the chapter 11 cases of Sam Wilson's/Kansas, Inc. (Case No. No. 19-12419), Darryl's of St. Louis County, Inc. (Case No 19-12420), Darryl's of Overland Park, Inc. (Case No. 19-12421), Algonquin Houlihan's Restaurant, L.L.C. (Case No. 19-12424), Houlihan's Restaurants of Texas, Inc. (Case No. 19-12426) Geneva Houlihan's Restaurant, L.L.C. (Case No. 19-12427), Hanley Station Houlihan's Restaurant, LLC (Case No.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: HRI Holding Corp. (4677), Houlihan's Restaurants, Inc. (8489), HDJG Corp. (3479), Red Steer, Inc. (2214), Sam Wilson's/Kansas, Inc. (5739), Darryl's of St. Louis County, Inc. (7177), Darryl's of Overland Park, Inc. (3015), Houlihan's of Ohio, Inc. (6410), HRI O'Fallon, Inc. (4539), Algonquin Houlihan's Restaurant, L.L.C. (0449), Geneva Houlihan's Restaurant, L.L.C. (3156), Hanley Station Houlihan's Restaurant, LLC (8058), Houlihan's Texas Holdings, Inc. (5485), Houlihan's Restaurants of Texas, Inc. (4948), JGIL Mill OP LLC (0741), JGIL Millburn, LLC (6071), JGIL Millburn Op LLC (N/A), JGIL, LLC (5485), JGIL Holding Corp. (N/A), JGIL Omaha, LLC (5485), HOP NJ NY, LLC (1106), HOP Farmingdale LLC (7273), HOP Cherry Hill LLC (5012), HOP Paramus LLC (5154), HOP Lawrenceville LLC (5239), HOP Brick LLC (4416), HOP Secaucus LLC (5946), HOP Heights LLC (6017), HOP Bayonne LLC (7185), HOP Fairfield LLC (8068), HOP Ramsey LLC (8657), HOP Bridgewater LLC (1005), HOP Parsippany LLC (1520), HOP Westbury LLC (2352), HOP Weehawken LLC (2571), HOP New Brunswick LLC (2637), HOP Holmdel LLC (2638), HOP Woodbridge LLC (8965), and Houlihan's of Chesterfield, Inc. (5073). The Debtors' corporate headquarters and the mailing address is 8700 State Line Road, Suite 100, Leawood, Kansas 66206.



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19-12428), JGIL Mill OP LLC (Case No. 19-12429), JGIL Millburn, LLC (Case No. 19-12430), JGIL Milburn Op LLC (Case No. 19-12431), JGIL, LLC (Case No. 19-12432), JGIL Holding Corp. (Case No. 19-12433), JGIL Omaha, LLC (Case No. 19-12434), HOP NJ NY, LLC (Case No. 19-12435), HOP Farmingdale LLC (Case No. 19-12436), HOP Cherry Hill LLC (Case No. 19-12437), HOP Paramus LLC (Case No. 19-12438), HOP Lawrenceville LLC (Case No. 19-12439), HOP Brick LLC (Case No. 19-12440), HOP Secaucus LLC (Case No. 19-12441), HOP Heights LLC (Case No. 19-12442), HOP Bayonne LLC (Case No. 19-12443), HOP Fairfield LLC (Case No. 19-12444), HOP Ramsey LLC (Case No. 19-12445), HOP Bridgewater LLC (Case No. 19-12446), HOP Parsippany LLC (Case No. 19-12447), HOP Westbury LLC (Case No. 19-12448), HOP Weehawken LLC (Case No. 19-12449), HOP New Brunswick LLC (Case No. 19-12450), HOP Holmdel LLC (Case No. 19-12451), HOP Woodbridge LLC (Case No. 19-12452), and Houlihan's of Chesterfield, Inc. (Case No. 19-12453), (collectively, the "Closing Cases"), and (ii) waiving the requirement of further post-confirmation reporting for the Debtors in the Closing Cases (collectively, the "Closing Debtors"). In support of this Motion, the Plan Administrator respectfully states as follows:

JURISDICTION

1. The Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334, the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012, and Article XI of the Plan (as defined below). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein are sections 105(a) and 350(a) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), Rule 3022 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and

Rule 3022-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

2. Pursuant to Local Rule 9013-1(f), the Plan Administrator consents to the entry of a final order or judgment by the Court in connection with this Motion if 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

3. On November 14, 2019 (the “Petition Date”), the Debtors commenced with this Court voluntary cases (the “Chapter 11 Cases”) for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b) [D.I. 52]. From the Petition Date through the effective date of the Plan, the Debtors managed and operated their businesses as debtors in possession under sections 1107 and 1108 of the Bankruptcy Code.

4. On November 22, 2019, an official committee of unsecured creditors (the “Committee”) was appointed by the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”). No trustee or examiner has been appointed in the Chapter 11 Cases.

5. Information regarding the Debtors’ history and business operations, capital structure and primary secured indebtedness, and the events leading up to the commencement of these Chapter 11 Cases can be found in the Declaration of Matthew R. Manning, in Support of the Chapter 11 Petitions and First Day Relief [D.I. 2].

PLAN

6. On November 5, 2020, the Court entered the Findings of Fact, Conclusions of Law, and Order (I) Confirming Joint Chapter 11 Plan of HRI Holding Corp. and Its Debtor Affiliates

and (II) Approving The Disclosure Statement on a Final Basis [D.I. 816] (the “Confirmation Order”), whereby the Joint Chapter 11 Plan of HRI Holding Corp. and Its Debtor Affiliates [D.I. 734] (including all exhibits and supplements thereto, and as modified or amended from time to time, the “Plan”) was confirmed. On November 13, 2020, the effective date of the Plan occurred.

7. The Plan provides for all assets that remain property of the Debtors’ estates, to vest in the Post-Effective Date Debtors’ estates for purposes of liquidating the Debtors’ estates (the “Remaining Estate Assets”). The Remaining Estate Assets are subject to the authority of the Plan Administrator, which was designated pursuant to the Plan Administration Agreement. Pursuant to the Plan, the Plan Administrator is authorized and empowered as of the Effective Date (i) to direct and control the liquidation of the Remaining Estate Assets and (ii) to dissolve any Debtor Affiliate and complete the winding down of the Debtor Affiliates without the need (a) for any company action or approval or (b) to pay any taxes or fees to cause such dissolution. Each of the Closing Debtors is a Debtor Affiliate. The Plan Administrator is also required to file quarterly reports with the Court and to pay all fees due and payable pursuant to section 1930 of the Judicial Code to the U.S. Trustee. Plan Art. XII. C.

8. By this Motion, the Plan Administrator requests entry of the Proposed Final Decree: (a) closing the Closing Cases; and (b) waiving the requirement of further post-confirmation reporting for the Closing Debtors.

BASIS FOR RELIEF

9. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” Bankruptcy Rule 3022, which implements section 350 of the Bankruptcy Code, provides that “[a]fter an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion

of a party in interest, shall enter a final decree closing the case.” Finally, Local Rule 3022-1(a) provides that “[u]pon written motion, a party in interest may seek the entry of a final decree at any time after the confirmed plan has been fully administered provided that all required fees due under 28 U.S.C. § 1930 have been paid.”

10. The Advisory Committee Notes to Bankruptcy Rule 3022 (the “Advisory Committee Notes”) set forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

- a. whether the order confirming the plan has become final;
- b. whether deposits required by the plan have been distributed;
- c. whether the property proposed by the plan to be transferred has been transferred;
- d. whether the debtor or its successor has assumed the business or the management of the property dealt with by the plan;
- e. whether payments under the plan have commenced; and
- f. whether all motions, contested matters, and adversary proceedings have been finally resolved.

11. Courts have adopted the view that “these factors are but a guide in determining whether a case has been fully administered, and not all factors need to be present before the case is closed.” *In re SLI, Inc.*, No. 02-12608 (WS), 2005 WL 1668396, at *2 (Bankr. D. Del. June 24, 2005) (citing *In re Mold Makers, Inc.*, 124 B.R. 766, 768–69 (Bankr. N.D. Ill. 1990)); see also *In re Omega Optical, Inc.*, 476 B.R. 157, 167 (Bankr. E.D. Pa. 2012) (noting that bankruptcy courts have flexibility in deciding whether an estate is fully administered and may consider the factors set forth in Rule 3022 as well as other relevant factors).

12. The Closing Cases are substantially consummated. These factors have been satisfied or are inapplicable: (a) the Confirmation Order was not appealed and has become final; (b) any property proposed by the Plan to be transferred was transferred on the Effective Date; (c) the Plan Administrator has assumed management of and authority over the Remaining Estate Assets; (d) to the extent there are remaining payments to be made under the Plan, such payments will be made by the Plan Administrator, who is authorized to conduct the claims reconciliation process; and (e) because of the Plan Administrator's authority to administer all remaining matters pursuant to the terms of the Plan, there is no need to resolve any further matters in the Closing Cases.

13. In addition, all expenses arising from the administration of the Closing Cases, including court fees, U.S. Trustee fees, professional fees, and expenses, have been paid or will be paid in the amounts due as soon as reasonably practicable after they become due or are allowed, as applicable, and after the closure of the Closing Cases.

14. Closing the Closing Cases will not prejudice any parties' rights, as such rights may be exercised in HRI Holdings, Corp. - Case No. 19-12415 (MFW) (the "Remaining Case"). The cases this Motion seeks to close are simply unnecessary to the continued administration of the Debtors' estates and related matters. The closure of the Closing Cases will allow the Debtors to avoid unnecessarily incurring additional fees to the U.S. Trustee on account of the Closing Cases. See, e.g., 28 U.S.C. § 1930(a)(6) (requiring the payment of quarterly fees to the trustee).

15. Finally, it is appropriate to waive the requirement of filing a final report under Local Rule 3022-1(c). The administration of assets and liabilities will occur in the Remaining Case in accordance with the provisions of the Plan and can be fully and fairly accounted for in the final report to be filed upon a request to close the Remaining Case. Consequently, filing a final report

for each of the Closing Cases at this time would not be helpful to the U.S. Trustee, creditors, or other parties in interest.

16. Accordingly, the Plan Administrator submits that there is ample justification for entry of a final decree closing the Closing Cases, and requests that the Court enter the Proposed Final Decree.

NOTICE

17. The Plan Administrator has provided notice of this Motion to: (a) the U.S. Trustee; and (b) all parties who have filed a renewed request for notice in the Chapter 11 Cases pursuant to Local Rule 2002-1 following occurrence of the Effective Date. In light of the nature of the relief requested herein, the Plan Administrator submits that no other or further notice is necessary.

18. A copy of this Motion is available on the website maintained by the Debtors' claims and noticing agent, Kurtzman Carson Consultants LLC, at <http://www.kccllc.net/hri>.

WHEREFORE, the Plan Administrator requests entry of a final decree, substantially in the form attached hereto as Exhibit A: (a) closing the Closing Cases; and (b) waiving the requirement of further post-confirmation reporting for the Closing Debtors.

Dated: October 22, 2021
Wilmington, Delaware

GELLERT SCALI BUSENKELL & BROWN

/s/ Ronald S. Gellert

Ronald S. Gellert (DE 4259)
Michael Busenkell (DE 3933)
1201 N. Orange Street, Suite 300
Wilmington, Delaware 19801
Telephone: (302) 425-5800
Facsimile: (302) 425-5814
Email: rgellert@gsbblaw.com
mbusenkell@gsbblaw.com

Counsel for the Plan Administrator

EXHIBIT A

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

In re: Sam Wilson's/Kansas, Inc., Debtor.	Chapter 11 Case No. 19-12419 (MFW)
In re: Darryl's of St. Louis County, Inc., Debtor.	Chapter 11 Case No. 19-12420 (MFW)
In re: Darryl's of Overland Park, Inc., Debtor.	Chapter 11 Case No. 19-12421 (MFW)
In re: Algonquin Houlihan's Restaurant, L.L.C., Debtor.	Chapter 11 Case No. 19-12424 (MFW)
In re: Houlihan's Restaurants of Texas, Inc., Debtor.	Chapter 11 Case No. 19-12426 (MFW)
In re: Geneva Houlihan's Restaurant, L.L.C., Debtor.	Chapter 11 Case No. 19-12427 (MFW)
In re: Hanley Station Houlihan's Restaurant, LLC, Debtor.	Chapter 11 Case No. 19-12428 (MFW)

In re: JGIL Mill OP LLC, Debtor.	Chapter 11 Case No. 19-12429 (MFW)
In re: JGIL Millburn, LLC, Debtor.	Chapter 11 Case No. 19-12430 (MFW)
In re: JGIL Milburn Op LLC, Debtor.	Chapter 11 Case No. 19-12431 (MFW)
In re: JGIL, LLC , Debtor.	Chapter 11 Case No. 19-12432 (MFW)
In re: JGIL Holding Corp., Debtor.	Chapter 11 Case No. 19-12433(MFW)
In re: JGIL Omaha, LLC, Debtor.	Chapter 11 Case No. 19-12434 (MFW)
In re: HOP NJ NY, LLC, Debtor.	Chapter 11 Case No. 19-12435 (MFW)

In re: HOP Farmingdale LLC, Debtor.	Chapter 11 Case No. 19-12436 (MFW)
In re: HOP Cherry Hill, LLC, Debtor.	Chapter 11 Case No. 19-12437 (MFW)
In re: HOP Paramus LLC, Debtor.	Chapter 11 Case No. 19-12438 (MFW)
In re: HOP Lawrenceville LLC, Debtor.	Chapter 11 Case No. 19-12439 (MFW)
In re: HOP Brick LLC, Debtor.	Chapter 11 Case No. 19-12440 (MFW)
In re: HOP Secaucus LLC, Debtor.	Chapter 11 Case No. 19-12441 (MFW)
In re: HOP Heights LLC, Debtor.	Chapter 11 Case No. 19-12442 (MFW)

In re: HOP Bayonne LLC, Debtor.	Chapter 11 Case No. 19-12443 (MFW)
In re: HOP Fairfield LLC, Debtor.	Chapter 11 Case No. 19-12444 (MFW)
In re: HOP Ramsey LLC, Debtor.	Chapter 11 Case No. 19-12445 (MFW)
In re: HOP Bridgewater LLC, Debtor.	Chapter 11 Case No. 19-12446 (MFW)
In re: HOP Parsippany LLC, Debtor.	Chapter 11 Case No. 19-12447 (MFW)
In re: HOP Westbury LLC, Debtor.	Chapter 11 Case No. 19-12448 (MFW)
In re: HOP Weehawken LLC, Debtor.	Chapter 11 Case No. 19-12449 (MFW)

In re: HOP New Brunswick LLC, Debtor.	Chapter 11 Case No. 19-12450 (MFW)
In re: HOP Holmdel LLC, Debtor.	Chapter 11 Case No. 19-12451 (MFW)
In re: HOP Woodbridge LLC, Debtor.	Chapter 11 Case No. 19-12452 (MFW)
In re: Houlihan's of Chesterfield, Inc., Debtor.	Chapter 11 Case No. 19-12453 (MFW)

FINAL DECREE CLOSING CERTAIN OF THE DEBTORS' CHAPTER 11 CASES

Upon consideration of the Plan Administrator's Motion for Entry of a Final Decree Closing Certain of the Debtors' Chapter 11 Cases (the "Motion") of Saccullo Business Consulting, LLC as plan administrator of the debtors (collectively, the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases"), for entry of a final decree and order (this "Final Decree"), pursuant to sections 105(a) and 350(a) of the Bankruptcy Code, Bankruptcy Rule 3022, and Local Rule 3022-1, (a) closing the Closing Cases; and (b) waiving the requirement of further post-confirmation reporting for the Closing Debtors; and this Court having reviewed the Motion; and this Court finding good and sufficient cause for granting the relief as provided herein; and after proper notice and opportunity to respond to the Motion; and this Court having jurisdiction over

this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware dated as of February 29, 2012,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED, as set forth herein.
2. All objections to the Motion or the relief requested therein that have not been withdrawn, waived, or settled, and all reservations of rights included therein, are overruled on the merits and denied with prejudice.
3. Pursuant to sections 1112(b) and 305(a) of the Bankruptcy Code, the Chapter 11 Cases of the following Debtors are hereby dismissed:

Debtor	Case Number
Sam Wilson's/Kansas, Inc.	19-12419
Darryl's of St. Louis County, Inc.	19-12420
Darryl's of Overland Park, Inc.	19-12421
Algonquin Houlihan's Restaurant, L.L.C.	19-12424
Houlihan's Restaurants of Texas, Inc.	19-12426
Geneva Houlihan's Restaurant, L.L.C.	19-12427
Hanley Station Houlihan's Restaurant, LLC	19-12428
JGIL Mill OP LLC	19-12429
JGIL Millburn, LLC	19-12430
JGIL Milburn Op LLC	19-12431
JGIL, LLC	19-12432
JGIL Holding Corp.	19-12433
JGIL Omaha, LLC	19-12434
HOP NJ NY, LLC	19-12435
HOP Farmingdale LLC	19-12436
HOP Cherry Hill LLC	19-12437
HOP Paramus LLC	19-12438
HOP Lawrenceville LLC	19-12439
HOP Brick LLC	19-12440
HOP Secaucus LLC	19-12441
HOP Heights LLC	19-12442
HOP Bayonne LLC	19-12443
HOP Fairfield LLC	19-12444
HOP Ramsey LLC	19-12445
HOP Bridgewater LLC	19-12446
HOP Parsippany LLC	19-12447

HOP Westbury LLC	19-12448
HOP Weehawken LLC	19-12449
HOP New Brunswick LLC	19-12450
HOP Holmdel LLC	19-12451
HOP Woodbridge LLC	19-12452
Houlihan's of Chesterfield, Inc.	19-12453

4. Proper and adequate notice of the Motion was given, and no other or further notice is necessary.

5. Entry of this Final Decree is without prejudice to the rights of the Debtors, the Plan Administrator, the U.S. Trustee, or any other party in interest to seek to reopen any of the Closing Cases for cause pursuant to section 350(b) of the Bankruptcy Code.

6. The Closing Cases are hereby removed from the joint administration order [D.I. 52]. The Remaining Case (Case No. 19-12415) shall remain OPEN pending further order of this Court and shall be administered under that caption.

7. The Plan Administrator shall complete any remaining quarterly reports with respect to the Closing Cases and pay all U.S. Trustee fees within thirty (30) days of the due date of such reports.

8. The Plan Administrator shall not be obligated to pay quarterly fees pursuant to 28 U.S.C. § 1930(a) with respect to the Closing Cases for any period after the date of the entry of this Order.

9. The final report for the Debtors in the Closing Cases required under Local Rule 3022-1(c) shall be included as part of a consolidated final report for all the Debtors and filed in connection with the closure of the Remaining Case.

10. The Clerk of the Court shall enter this Final Decree on the docket of the Closing Cases, and thereafter each such docket shall be marked as "Closed."

11. All motions, contested matters, and adversary proceedings that remain open as of the date hereof, or that are opened in the future, with respect to the Debtors in the Closing Cases will be administered under the Remaining Case.

12. The Plan Administrator and Kurtzman Carson Consultants LLC, LLC, the Debtors' claims and noticing agent, are authorized to take all actions that may be necessary to undertake the relief granted in this Final Decree.

13. To the extent allowed by applicable law, this Court shall retain jurisdiction with respect to any matters or disputes related to the Closing Cases, including, without limitation, any matters or disputes relating to the effect of provisions contained in the Plan and/or the Confirmation Order. and any other order of this Court entered in the Chapter 11 Cases of the Closing Debtors.

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

In re:

HRI HOLDING CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-12415 (MFW)
(Jointly Administered)

Hearing Date: November 30, 2021 at 11:30 am (ET)

Objection Deadline: November 12, 2021 at 4:00 pm (ET)

**NOTICE OF PLAN ADMINISTRATOR'S MOTION FOR ENTRY OF A FINAL
DECREE CLOSING CERTAIN OF THE DEBTORS' CHAPTER 11 CASES**

PLEASE TAKE NOTICE that Anthony M. Saccullo, in his capacity as the Plan Administrator of HRI Holding Corp. and its affiliated debtors in the above-captioned chapter 11 bankruptcy proceeding (the “Plan Administrator”) has filed the *Plan Administrator’s Motion for Entry of a Final Decree Closing Certain of the Debtors’ Chapter 11 Cases* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that if you oppose the Motion or if you want the court to consider your views regarding the Motion, you must file a written response with the Court detailing your objection or response by **November 12, 2021 at 4:00 p.m. (ET)**. You must also serve a copy of your response upon undersigned counsel for the Plan Administrator.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: HRI Holding Corp. (4677), Houlihan’s Restaurants, Inc. (8489), HDJG Corp. (3479), Red Steer, Inc. (2214), Sam Wilson’s/Kansas, Inc. (5739), Darryl’s of St. Louis County, Inc. (7177), Darryl’s of Overland Park, Inc. (3015), Houlihan’s of Ohio, Inc. (6410), HRI O’Fallon, Inc. (4539), Algonquin Houlihan’s Restaurant, L.L.C. (0449), Geneva Houlihan’s Restaurant, L.L.C. (3156), Hanley Station Houlihan’s Restaurant, LLC (8058), Houlihan’s Texas Holdings, Inc. (5485), Houlihan’s Restaurants of Texas, Inc. (4948), JGIL Mill OP LLC (0741), JGIL Millburn, LLC (6071), JGIL Milburn Op LLC (N/A), JGIL, LLC (5485), JGIL Holding Corp. (N/A), JGIL Omaha, LLC (5485), HOP NJ NY, LLC (1106), HOP Farmingdale LLC (7273), HOP Cherry Hill LLC (5012), HOP Paramus LLC (5154), HOP Lawrenceville LLC (5239), HOP Brick LLC (4416), HOP Secaucus LLC (5946), HOP Heights LLC (6017), HOP Bayonne LLC (7185), HOP Fairfield LLC (8068), HOP Ramsey LLC (8657), HOP Bridgewater LLC (1005), HOP Parsippany LLC (1520), HOP Westbury LLC (2352), HOP Weehawken LLC (2571), HOP New Brunswick LLC (2637), HOP Holmdel LLC (2638), HOP Woodbridge LLC (8965), and Houlihan’s of Chesterfield, Inc. (5073). The Debtors’ mailing address is HRI Holdings Corp., c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, Delaware 19701.

PLEASE TAKE FURTHER NOTICE that the hearing on the Motion is scheduled for -
November 30, 2021 at 11:30 am (ET) before the Honorable Mary F. Walrath in Courtroom No.
4, 5th Floor, in the United States Bankruptcy Court located at 824 N. Market Street, Wilmington,
Delaware 19801.

**IF YOU DO NOT TAKE THESE STEPS BY THE DEADLINE, THE COURT MAY
DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION
AND MAY GRANT OR OTHERWISE DISPOSE OF THE MOTION BEFORE THE
SCHEDULED HEARING DATE.**

Dated: October 22, 2021

GELLERT SCALI BUSENKELL & BROWN, LLC

/s/ Ronald S. Gellert

Ronald S. Gellert (No. 4259)
Michael Busenkell (No. 3933)
Bradley P. Lehman (No. 5921)
1201 N. Orange St., Suite 300
Wilmington, Delaware 19801
Telephone: (302) 425-5800
Facsimile: (302) 425-5814
Email: rgellert@gsbblaw.com
mbusenkell@gsbblaw.com
blehman@gsbblaw.com

Counsel for the Plan Administrator

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 22, 2021, I caused a true and correct copy of *Plan Administrator's Motion for Entry of a Final Decree Closing Certain of the Debtors' Chapter 11 Cases* to be electronically filed and served via CM/ECF upon all parties requesting electronic notices in this case and additionally upon the parties on the attached service list in the manner indicated

Dated: October 22, 2021

/s/ Michael Busenkell

Michael Busenkell (DE 3933)

Via Electronic Mail and First-Class Mail: Jane M. Leamy, Esq. Office of the United States Trustee 844 King Street, Suite 2207 Wilmington, DE 19801	
Via Email: Sean Beach, Esq. Jamie Luton Chapman, Esq. Young Conaway Stargatt & Taylor, LLP Rodney Square 1000 North King Street Wilmington DE 19801 sbeach@ycst.com jchapman@ycst.com	William B. Freeman, Esq. Karen B. Dine, Esq. Katten Muchin Rosenman LLP 575 Madison Ave. New York, NY 10022 Bill.freeman@katten.com Karen.dine@katten.com
Richard M. Beck, Esq. Sally E. Veghte, Esq. Klehr Harrison Harvey Branzburg LLP 919 N. Market Street, Suite 1000 Wilmington, Delaware 19801 rbeck@klehr.com sveghte@klehr.com	Jason R. Adams, Esq. Eric R. Wilson, Esq. Maeghan L. McLoughlin, Esq. Kelley Drye & Warren LLP 101 Park Avenue New York, New York 10178 jadams@kelleydrye.com ewilson@kelleydrye.com mmcloughlin@kelleydrye.com
Adam G. Landis Kimberly A. Brown Matthew R. Pierce Landis Rath & Cobb LLP 919 Market Street, Suite 1800 Wilmington, DE 19801 landis@lrclaw.com brown@lrclaw.com pierce@lrclaw.com	

Houlihan's Restaurants, Inc.

8700 State Line Rd
Suite 100
Leawood, KS 66206

Taubman Landlords

Andrew S. Conway
200 East Long Lake Road, Suite 300
Bloomfield Hills, MI 48304

Kurtzman Carson Consultants LLC

Leanne Rehder Scott
222 N. Pacific Coast Highway
Suite 300
El Segundo, CA 90245

Ballard Spahr LLP

Attn Leslie C. Heilman & Laurel D. Roglen
919 N. Market Street, 11th Floor
Wilmington, DE 19801-3034

Ballard Spahr LLP

Dustin P. Branch
2029 Century Park East, Suite 800
Los Angeles, CA 90067-2909

Brookfield Property REIT, Inc.

Kristen N. Pate
SVP & Senior Associate General Counsel
Brookfield Property REIT Inc., as Agent
350 N. Orleans Street, Suite 300
Chicago, IL 60654-1607

Bryan Cave Leighton Paisner

Leslie A. Bayles
161 North Clark Street
Suite 4300
Chicago, IL 60601

Chipman Brown Cicero & Cole, LLP

Mark L. Desgrosseilliers
1313 North Market Street, Suite 5400
Hercules Plaza
Wilmington, DE 19801

CIT Bank, N.A.

Attn Michael Aliberto
11 West 42nd Street
New York, NY 10036

**Commonwealth Pennsylvania, Department of
Labor and Industry**

Deb Secrest, Collections Support Unit
651 Boas Street, Room 925
Harrisburg, PA 17121

Delaware Dept of Justice

Attorney General
Attn Bankruptcy Department
Carvel State Building
820 N French St
Wilmington, DE 19801

Delaware Secretary of State

Franchise Tax
PO Box 898
Dover, DE 19903

Delaware State Treasury

820 Silver Lake Blvd Suite 100
Dover, DE 19904

Environmental Protection Agency

Office of General Counsel
US EPA William Jefferson Clinton Building South
(WJC South)
1200 Pennsylvania Avenue NW 2310A
Washington, DC 20004

FisherBroyles, LLP

Hollace T. Cohen
445 Park Avenue, 9th Floor
New York, NY 10022

Frost Brown Todd LLC

Ronald E. Gold and A.J. Webb
3300 Great American Tower
301 East Fourth Street
Cincinnati, OH 45202

Hahn & Hessen LLP

Gilbert Backenroth and Janine M. Figueiredo
488 Madison Avenue
New York, NY 10022

Internal Revenue Service

Attn Susanne Larson
31 Hopkins Plz Rm 1150
Baltimore, MD 21201

Internal Revenue Service

Centralized Insolvency Operation
PO Box 7346
Philadelphia, PA 19101-7346

Internal Revenue Service

Centralized Insolvency Operation
2970 Market St
Philadelphia, PA 19104

Jenny Hyun

Legal Department
2600 Citadel Plaza Drive, Suite 300
P.O. Box 924133
Houston, TX 77292-4133

Kane Russell Coleman Logan PC

S. Kyle Woodard
901 Main Street, Suite 5200
Dallas, TX 75202

US Attorney for District of Delaware

US Attorney for Delaware
1313 N Market Street
Hercules Building
Wilmington, DE 19801

Linebarger Goggan Blair & Sampson, LLP

Attn Elizabeth Weller
2777 N. Stemmons Freeway, Suite 1000
Dallas, TX 75207

The Rosner Law Group LLC

Frederick B. Rosner and Zhao (Ruby) Liu
824 N. Market Street, Suite 810
Wilmington, DE 19801

Ulmer & Berne LLP

Michael S. Tucker
1660 West 2nd Street, Suite 1100
Cleveland, OH 44113-1448

United States Department of Justice

950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Linebarger Goggan Blair & Sampson, LLP

Don Stecker
711 Navarro Street, Ste 300
San Antonio, TX 78205

Linebarger Goggan Blair & Sampson, LLP

John P. Dillman
PO Box 3064
Houston, TX 77253-3064

McCreary, Veselka, Bragg & Allen, P.C.

Tara LeDay
P.O. Box 1269
Round Rock, TX 78680

Missouri Department of Revenue

Bankruptcy Unit
Attn Steven A. Ginther
PO Box 475
Jefferson City, MO 65105-0475

Montgomery McCracken Walker & Rhoads LLP

Marc J. Phillips
1105 North Market Street, Suite 1500
Wilmington, DE 19801

**Monzack Mersky McLaughlin and Browder,
P.A.**

Rachel B. Mersky and Brian J. McLaughlin
1201 N. Orange Street, Suite 400
Wilmington, DE 19801

**New York State Department of Taxation and
Finance**

Robert L. Cook
340 East Main St.
Rochester, NY 14604

The Prinz Law Firm, P.C.

Kristen E. Prinz and Amit Bindra
1 East Wacker Drive, Suite 2500
Chicago, IL 60601

Perdue, Brandon, Fielder, Collins & Mott, L.L.P.

c/o Eboney Cobb
500 E. Border Street, Suite 640
Arlington, TX 76010

Quarles & Brady LLP

c/o L. Katie Mason, Esq.
411 E. Wisconsin Avenue, Suite 2400
Milwaukee, WI 53202

SATC|LAW

Robert D. Tepper
311 South Wacker Drive, Suite 2500
Chicago, IL 60606

Saul Ewing Arnstein & Lehr LLP

John D. Demmy
1201 N. Market Street, Suite 2300
P.O. Box 1266
Wilmington, DE 19899

Saul Ewing Arnstein & Lehr LLP

Monique B. DiSabatino
1201 North Market Street, Suite 2300
P.O. Box 1266
Wilmington, DE 19899

Securities & Exchange Commission

G Jeffrey Boujoukos Regional Director
1617 JFK Boulevard Ste 520
Philadelphia, PA 19103

Securities & Exchange Commission

Secretary of the Treasury
100 F St NE
Washington, DC 20549

Securities & Exchange Commission NY Office

Andrew Calamari Regional Director
Brookfield Place
200 Vesey St Ste 400
New York, NY 10281-1022

Simon Property Group, Inc.

Ronald M. Tucker
225 West Washington Street
Indianapolis, IN 46204

Stark & Stark PC

Attn Joseph H. Lemkin
PO Box 5315
Princeton, NJ 08543

Stark & Stark PC

Attn Thomas S. Onder
PO Box 5315
Princeton, NJ 08543

State of Michigan, Department of Treasury

Dana Nessel and Katherine C Kerwin
Cadillac Place, Ste 10-200
3030 W Grand Blvd
Detroit, MI 48202

**State of Ohio Bureau of Workers'
Compensation**

Dave Yost and Cory D. Steinmetz
150 E Gay St., 21st Floor
Columbus, OH 43215

**Stone, Leyton & Gershman A Professional
Corporation**

Howard S. Smotkin
7733 Forsyth Blvd., Suite 500
St. Louis, MO 63105