

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

In re: X
: Chapter 11
:
SEQUENTIAL BRANDS GROUP, INC., *et* : Case No. 21-11194 (JTD)
al.,¹ :
: (Jointly Administered)
Debtors. :
: **Ref. Docket No. 700**
X

**CERTIFICATION OF NO OBJECTION REGARDING LIQUIDATING
TRUSTEE’S MOTION TO FURTHER ENLARGE THE PERIOD WITHIN
WHICH IT MAY REMOVE ACTIONS**

The undersigned hereby certifies that:

1. On December 29, 2023, Drivetrain LLC, in its capacity as trustee of the liquidating trust (the “Liquidating Trustee”) for the above-captioned debtors and debtors in possession (collectively, the “Debtors”), filed the *Liquidating Trustee’s Motion to Further Enlarge the Period Within Which It May Remove Actions* [Docket No. 700] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).
2. Pursuant to the notice of Motion, responses were due to be filed on, or prior to, January 12, 2024, at 4:00 p.m. (ET) (the “Objection Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: Sequential Brands Group, Inc. (2789), SQBG, Inc. (9546), Sequential Licensing, Inc. (7108), William Rast Licensing, LLC (4304), Heeling Sports Limited (0479), Brand Matter, LLC (1258), SBG FM, LLC (8013), Galaxy Brands LLC (9583), The Basketball Marketing Company, Inc. (7003), American Sporting Goods Corporation (1696), LNT Brands LLC (3923), Joe’s Holdings LLC (3085), Gaiam Brand Holdco, LLC (1581), Gaiam Americas, Inc. (8894), SBG-Gaiam Holdings, LLC (8923), SBG Universe Brands, LLC (4322), and GBT Promotions LLC (7003). The mailing address for each Debtor is 105 E. 34th Street, #249, New York, NY 10016. On September 26, 2022, 2022, the Court entered an order [Docket No. 646] closing the chapter 11 cases of the Debtors other than Case No. 21-11194 (JTD), *Sequential Brands Group, Inc.*



3. The undersigned certifies that the Bankruptcy Court's docket has been reviewed in this case and no answer, objection or other responsive pleading to the Motion appears thereon.

4. Accordingly, the Liquidating Trustee respectfully request entry of the Proposed Order attached hereto as **Exhibit 1** at the Bankruptcy Court's convenience.

Dated: January 17, 2024

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Timothy P. Cairns

Laura Davis Jones (Bar No. 2436)

Timothy P. Cairns (Bar No. 4228)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, Delaware 19899 (Courier 19801)

Tel: (302) 652-4100

Fax: (302) 652-4400

Email: ljones@pszjlaw.com

tcairns@pszjlaw.com

Counsel to the Liquidating Trustee

EXHIBIT 1

consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that notice of and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The period within which the Liquidating Trustee may seek removal of the Actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 is enlarged through and including July 1, 2024, without prejudice to the rights of the Liquidating Trustee to seek further extensions.
3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
4. The Liquidating Trustee is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.