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*Counsel for the Debtors  
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	: :
TGHI, INC., <u>et al.</u> ,	: Case No. 16-10300(MEW)
	: :
Debtors. <sup>1</sup>	: Jointly Administered
	: :
-----	X

**CERTIFICATE OF NO OBJECTION REGARDING MOTION FOR AN ORDER (I)  
ENTERING FINAL DECREE AND CLOSING CHAPTER 11 CASES; AND (II)  
TERMINATING ENGAGEMENT OF CLAIMS AND NOTICING AGENT**

Pursuant to Rule 9075-2 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the "Local Rules"), the undersigned hereby certifies as follows:

1. On December 21, 2016, the above-captioned debtors and debtors-in-possession ("Debtors") filed their Motion for an Order (I) Entering Final Decree and Closing Chapter 11 Cases; and (II) Terminating Engagement of Claims and Noticing Agent (the "Motion") [Docket No. 88] and Notice of Presentment of Proposed Final Decree and Order (I) Closing Chapter 11 Cases; and (II) Terminating Engagement of Claims and Noticing Agent (the "Notice of Presentment") [Docket No.

<sup>1</sup> The Debtors and the last four digits of their taxpayer identification numbers are as follows: TGHI, Inc. (3814) and Parent THI, Inc. (5521).



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2. The Debtors caused the Motion and Notice of Presentment to be served on December 21, 2016 in accordance with the Federal Rules of Bankruptcy Procedures and the Local Rules. See Affidavit of Service of Lydia Pastor Nino, sworn to on December 22, 2016 [Docket No. 91].

3. Pursuant to the Notice of Presentment, any objections to the Motion were to be filed and served by no later than December 27, 2016 at 4:00 p.m. (the “Objection Deadline”).

4. As of the date hereof, no objection, responsive pleading, or request for a hearing with respect to the Motion has been filed or served on the Debtors, and the Debtors' counsel has reviewed the Court's docket in these cases and no objection, responsive pleading or request for hearing with respect to the Motion appears thereon.

5. Accordingly, the Debtors respectfully request that the Court enter the proposed order, attached hereto as **Exhibit A**, granting the Motion.

Dated: New York, New York  
December 28, 2016

**KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP**

By: /s/ Joseph C. Corneau

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*Counsel for the Debtors  
and Debtors-in-Possession*

**Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
In re:	: Chapter 11
	:
TGHI, INC., <u>et al.</u> ,	: Case No. 16-10300(MEW)
	:
Debtors. <sup>2</sup>	: Jointly Administered
	:
-----	X

**FINAL DECREE AND ORDER (I) CLOSING CHAPTER 11 CASES; AND (II)  
TERMINATING ENGAGEMENT OF CLAIMS AND NOTICING AGENT**

Upon consideration of the motion of TGHI, Inc. (“Holdings”) and Parent THI, Inc. (“Parent,” and together with Holdings, the “Debtors”), the Debtors in the above-captioned Chapter 11 Cases, (i) pursuant to section 350(a) of Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the “Bankruptcy Code”) and Rule 3022 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), for entry of a final decree and order (i) closing the Chapter 11 Cases; and (ii) terminating the engagement of KCC<sup>3</sup> as claims and noticing Agent (the “Motion”); and the Court having jurisdiction to consider the Motion; and sufficient notice of the Motion having been given; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted.
2. Pursuant to section 350(a) of the Bankruptcy Code and Bankruptcy Rule 3022 and the Plan, the Debtors’ Chapter 11 Cases are closed, subject only to this Court’s continued jurisdiction as set forth in the Prepackaged Plan, and without prejudice to the rights of any party in interest to seek to reopen the Chapter 11 Cases for cause shown.

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<sup>2</sup> The Debtors and the last four digits of their taxpayer identification numbers are as follows: Parent THI, Inc. (5521) and TGHI, Inc. (3814).

<sup>3</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

3. The clerk of the Court is directed to mark each of the Debtors' Chapter 11 Cases as "closed".

4. The appointment and services of KCC as claims and noticing agent is terminated as of the date hereof.

5. KCC shall have no further obligations to the Court, the Debtors, their estates, their creditors, or any other party in interest with respect to the Chapter 11 Cases, except that within thirty (30) days of entry of this Order, KCC shall (a) prepare a final claims register for the Clerk of the United States Bankruptcy Court for the Southern District of New York (the "Clerk of the Court") pursuant to the guidelines for implementing 28 U.S.C. § 156(c) and (b) box and transport all claims to the Federal Archives, at the direction of the Clerk of the Court.

6. The terms of this Order are effective immediately and enforceable upon its entry.

7. The Court shall retain jurisdiction to hear and determine all matters arising from or related to implementation of this Order.

Dated: New York, New York  
\_\_\_\_\_, 2016

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UNITED STATES BANKRUPTCY JUDGE