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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

THRASIO HOLDINGS, INC., *et al.*,  
  
Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11840 (CMG)

(Jointly Administered)

**APPLICATION FOR ORDER SHORTENING TIME FOR HEARING  
ON THE MOTION FOR ENTRY OF AN ORDER AUTHORIZING  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO  
FILE UNDER SEAL ITS LETTER TO THE COURT**

The Official Committee of Unsecured Creditors (the “Committee”) of Thrasio Holdings, Inc., *et al.* (collectively, the “Debtors”), by and through its undersigned counsel, respectfully requests through this application (the “Application”) that the time period for a hearing on the *Motion for Entry of an Order (I) Authorizing the Official Committee of Unsecured Creditors to File Under Seal the Letter to the Court, and (II) Granting Related Relief* (the “Seal Motion”), as

<sup>1</sup> The last four digits of Debtor Thrasio Holdings, Inc.’s tax identification number are 8327. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.kccllc.net/Thrasio>. The Debtors’ service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.



required by Fed. R. Bankr. P. 2002, be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. The Committee requests a hearing on shortened time because, contemporaneously herewith, the Committee filed its status report and letter to the court, dated May 6, 2024, filed at Docket No. 720 (the “Letter”) which the Committee plans to discuss in more detail at the status conference scheduled for May 7, 2024 at 12:00 p.m. (the “Status Conference”). The Seal Motion seeks to seal certain portions of the Letter that contain information that has been designated as confidential under the confidentiality agreement entered into between the Committee and Debtors. If this Application is not granted, parties would have twenty-one (21) days to object to the Seal Motion, which would permit parties to file objections after the Status Conference. The Committee therefore respectfully requests that the Court enter an order shortening time to consider the Seal Motion such that the Seal Motion will be heard at the Status Conference.

2. By this Application, the Committee respectfully requests that the hearing on the Seal Motion be scheduled at the Status Conferenced set for May 7, 2024.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P. 9006(c)(1).

*(Remainder of Page Intentionally Left Blank)*

**WHEREFORE**, the Committee respectfully requests that this Court (i) grant the Application, (ii) enter the form of order substantially in the form submitted herewith, and (iii) grant such other and further relief as it deems necessary and appropriate.

The applicant requests entry of the proposed order shortening time.

Dated: May 6, 2024

Respectfully submitted,

By: /s/ James S. Carr

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<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b> Lorenzo Marinuzzi, Esq. (admitted <i>pro hac vice</i> ) Theresa A. Foudy, Esq. (admitted <i>pro hac vice</i> ) Doug Mannal, Esq. (admitted <i>pro hac vice</i> ) Raff Ferraioli, Esq. (admitted <i>pro hac vice</i> ) Darren Smolarski, Esq. (NJ Bar No. 307592020) <b>MORRISON &amp; FOERSTER LLP</b> 250 West 55th Street New York, New York 10019-9601 Tel: (212) 468-8000 Fax: (212) 468-7900 Email: lmarinuzzi@mofo.com tfoudy@mofo.com dmannal@mofo.com rferraioli@mofo.com dsmolarski@mofo.com  James S. Carr, Esq. Maeghan J. McLoughlin, Esq. ( <i>pro hac vice</i> pending) Connie Y. Choe, Esq. <b>KELLEY DRYE &amp; WARREN LLP</b> One Jefferson Road, 2 <sup>nd</sup> Floor Parsippany, NJ 07054 Tel: (973) 503-5900 Fax: (973) 503-5950 Email: jcarr@kelleydrye.com mmcloughlin@kelleydrye.com cchoe@kelleydrye.com  <i>Co-Counsel to the Official Committee of Unsecured Creditors</i>	
In re:	Chapter 11
THRASIO HOLDINGS, INC., <i>et al.</i> ,	Case No. 24-11840 (CMG)
Debtors. <sup>1</sup>	(Jointly Administered)

**ORDER SHORTENING TIME PERIOD FOR NOTICE,  
SETTING HEARING AND LIMITING NOTICE**

<sup>1</sup> The last four digits of Debtor Thrasio Holdings, Inc.'s tax identification number are 8327. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' claims and noticing agent at <https://www.kccllc.net/Thrasio>. The Debtors' service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

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Debtors: THRASIO HOLDINGS, INC., *et al.*

Case No. 24-11840 (CMG)

Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE, SETTING  
HEARING AND LIMITING NOTICE

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The relief set forth on the following pages, numbers two (2) through three (3) is hereby  
**ORDERED.**

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Debtors: THRASIO HOLDINGS, INC., *et al.*  
Case No. 24-11840 (CMG)  
Caption of Order: ORDER SHORTENING TIME PERIOD FOR NOTICE, SETTING  
HEARING AND LIMITING NOTICE

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After review of the application of the Official Committee of Unsecured Creditors (the “Committee”), for a reduction of time for a hearing on the *Motion for Entry of an Order (I) Authorizing the Official Committee of Unsecured Creditors to File Under Seal the Letter to the Court, and (II) Granting Related Relief*, under Fed. R. Bankr. P. 9006(c)(1), it is

ORDERED as follows:

1. A hearing will be conducted on the matter on \_\_\_\_\_ at \_\_\_\_\_ in the United States Bankruptcy Court, District of New Jersey, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, Courtroom No. 3.

2. The Committee must serve a copy of this Order, and all related documents, on all parties entitled to receive notice under Rule 2002 by email.

3. The Committee must also serve a copy of this Order, and all related documents, on the following parties:

\_\_\_\_\_  
\_\_\_\_\_

by ☐ each, ☐ any of the following methods selected by the Court:

☐ fax, ☐ overnight mail, ☐ regular mail, ☐ email, ☐ hand delivery.

4. Service must be made:

☐ on the same day as the date of this order, or

☐ within \_\_\_\_\_ day(s) of the date of this Order.

5. Notice by telephone:

☐ is not required

☐ must be provided to \_\_\_\_\_

☐ on the same day as the date of this Order, or

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Debtors: THRASIO HOLDINGS, INC., *et al.*  
Case No. 24-11840 (CMG)  
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☐ within \_\_\_\_\_ day(s) of the date of this Order.

6. A *Certification of Service* must be filed prior to the hearing date.

7. Any objections to said application:

☐ must be filed with the Court and served on all parties in interest by electronic  
or overnight mail \_\_\_\_\_ day(s) prior to the scheduled hearing; or

☐ may be presented orally at the hearing.

8. ☐ Court appearances are required to prosecute said application and any  
objections.

☐ Parties may request to appear by phone by contacting Chambers prior to the  
return date.