

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

CBCRC LIQUIDATING CORP., et al.,¹

Debtors.

Chapter 11
Case No. 23-10245 (KBO)
(Jointly Administered)

Hearing Date: April 10, 2024 at 10:30 a.m. (ET)
Objection Deadline: April 3, 2024 at 4:00 p.m. (ET)

OPT-OUT NOTICE AND PAYMENT REQUEST²

Name of Creditor: Brixmor Brea Gateway, LLC

Address: c/o Ballard Spahr LLP, ATTN: Leslie C. Heilman, 919 N. Market Street, 11th Floor, Wilmington, DE 19801

Amount of Asserted Unpaid Claim and Payment Request: \$49,027.80

Basis for the Claim: ☐ Goods sold ☐ Services performed ☒ Other: Real Property Lease (attached support)

☒ Verification that Goods or Services Were Provided Between February 22, 2023, and June 14, 2023

Signature: /s/ Leslie C. Heilman

Name: Leslie C. Heilman

☐ Creditor ☒ Creditors' Attorney

Title: Attorney for Creditor

Company: Ballard Spahr LLP

Address: 919 N. Market Street, 11th Floor, Wilmington, DE 19801

Email: heilmanl@ballardspahr.com Phone No. 302.252.4446

ATTACH ANY SUPPORTING DOCUMENTS TO THIS FORM. ATTACH REDACTED COPIES OF ANY DOCUMENTS THAT SHOW THAT THE DEBT EXISTS, A LIEN SECURES THE DEBT, OR BOTH.

BY SUBMITTING THIS REQUEST, THE PARTY ASSERTING A CLAIM CERTIFIES UNDER THE PENALTY OF PERJURY THAT (A) THE GOODS AND SERVICES THAT FORM THE BASIS OF THE REQUEST WERE PROVIDED TO THE DEBTORS BETWEEN FEBRUARY 22, 2023 AND JUNE 14, 2024 AND ARE WORTH THE VALUE REQUESTED, (B) THE AMOUNT REQUESTED IS UNPAID AND HAS NOT BEEN RECEIVED OR RECOVERED BY OTHER MEANS OR FROM OTHERS, (C) IT AGREES TO ACCEPT AND LIMIT ITS RECOVERY TO ITS *PRO RATA* SHARE OF THE REMAINING CASH SHOULD THE AMOUNT REQUESTED BE ACCEPTED BY THE DEBTORS OR SSCP OR ALLOWED BY THE BANKRUPTCY COURT, AND (D) IT SUBMITS TO THE BANKRUPTCY COURT'S JURISDICTION TO DETERMINE THE VALIDITY OF ANY SUCH REQUEST.

NOTE: This *Opt-Notice and Payment Request* is a not a proof of claim and should not be filed as a proof of claim, and the filing of a proof of claim on the claims register does not satisfy the requirements for filing and serving an Opt-Out Notice and Payment Request or objection to the Settlement Motion.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include CBCRC Liquidating Corp. (0801), CBHC Liquidating Company (3981), and CBCCI Liquidating Inc. (1938). The Debtors' service address is Corner Bakery, c/o CR3 Partners, Attn: Greg Baracato, Chief Restructuring Officer, 13355 Noel Road, Suite 2005, Dallas TX 75240.

² Capitalized terms used herein and not otherwise defined have the means set forth in the Motion, if



2310245240329000000000003

Date Filed	State Filed	Alternata BU	Legal Entity Name	Lease Number	Tenant Number	Store Number	GL Date	Bill Code	Name - Remark	Date Range Billed	Gross Amount	Total Amt Due	Pre-Petition Charges thru 2/21/2023	Post-Petition Charges 2/22/2023-current	Annualized Rent + Extra	Amount Due thru Lease Expiration	Lease Status	Rejection Date	Lease Expiration Date	Original Lease Start Date
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	3/22/2022	PLC	Base Rent	03/01/2022 - 03/31/2022	2,408.68	2,408.68	2,408.68				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	3/22/2022	PLC	Common Area Maint.	03/01/2022 - 03/31/2022	494.13	494.13	494.13				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	3/22/2022	PLC	Insurance	03/01/2022 - 03/31/2022	156.58	156.58	156.58				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	3/22/2022	PLC	Real Estate Tax	03/01/2022 - 03/31/2022	209.23	209.23	209.23				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	11/22/2022	MISC	TBB-8608 - Admin Fee	11/01/2022 - 11/30/2022	256.00	256.00	256.00				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	11/22/2022	BACK	TBB-9608 - Shelton Fire Protec	11/01/2022 - 11/30/2022	1,280.00	1,280.00	1,280.00				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	12/22/2022	MISC	TBB-9017 - Admin Fee	12/01/2022 - 12/31/2022	208.36	208.36	208.36				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	12/22/2022	BACK	TBB-9017 - Solid Property Serv	12/01/2022 - 12/31/2022	2,083.56	2,083.56	2,083.56				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	1/1/2023	AMR	Annual Minimum Rent	01/01/2023 - 01/31/2023	12,444.85	12,444.85	12,444.85				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	1/1/2023	CAM	CAM (Escrow / Deposit)	01/01/2023 - 01/31/2023	2,553.00	2,553.00	2,553.00				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	1/1/2023	INS	Insurance	01/01/2023 - 01/31/2023	809.00	809.00	809.00				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	1/1/2023	RETX	Real Estate Tax (Escrow)	01/01/2023 - 01/31/2023	1,081.00	1,081.00	1,081.00				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	1/12/2023	LATE	Generated Fee or Interest	01/01/2023 - 01/31/2023	1,688.79	1,688.79	1,688.79				J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	2/1/2023	AMR	Annual Minimum Rent	02/01/2023 - 02/28/2023	12,444.85	12,444.85	9,333.64	3,111.21			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	2/1/2023	CAM	CAM (Escrow / Deposit)	02/01/2023 - 02/28/2023	2,553.00	2,553.00	1,914.75	638.25			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	2/1/2023	INS	Insurance	02/01/2023 - 02/28/2023	809.00	809.00	606.75	202.25			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	2/1/2023	RETX	Real Estate Tax (Escrow)	02/01/2023 - 02/28/2023	1,081.00	1,081.00	810.75	270.25			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	6/1/2023	AMR	Annual Minimum Rent	06/01/2023 - 06/30/2023	12,444.85	12,444.85		12,444.85			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	6/1/2023	CAM	CAM (Escrow / Deposit)	06/01/2023 - 06/30/2023	2,553.00	2,553.00		2,553.00			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	6/1/2023	INS	Insurance	06/01/2023 - 06/30/2023	809.00	809.00		809.00			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	6/1/2023	RETX	Real Estate Tax (Escrow)	06/01/2023 - 06/30/2023	1,081.00	1,081.00		1,081.00			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	6/2/2023	FRRET	2022 RET Brixmor Share	01/01/2022 - 12/31/2022	14,780.99	14,780.99		14,780.99			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	6/2/2023	PLC	2022 RET Seller's Share	01/01/2022 - 12/31/2022	(9.94)	(9.94)		(9.94)			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	6/27/2023	RCAM	2022 CAM/INS Buyer's Share	01/01/2022 - 12/31/2022	(9,788.74)	(9,788.74)		(9,788.74)			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	6/27/2023	PLC	2022 CAM/INS Seller's Share	01/01/2022 - 12/31/2022	(163.60)	(163.60)		(163.60)			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	7/1/2023	CAM	CAM (Escrow / Deposit)	07/01/2023 - 07/31/2023	2,553.00	2,553.00		2,553.00			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	7/1/2023	INS	Insurance	07/01/2023 - 07/31/2023	809.00	809.00		809.00			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	1768028	939464 - Corner Bakery	211	7/1/2023	RETX	Real Estate Tax (Escrow)	07/01/2023 - 07/31/2023	1,081.00	1,081.00		1,081.00			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	01768028	939464 - Corner Bakery	211	8/1/2023	AMR	Annual Minimum Rent	08/01/2023-08/31/2023	12,444.85	12,444.85		12,444.85			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	01768028	939464 - Corner Bakery	211	8/1/2023	CAM	CAM (Escrow / Deposit)	08/01/2023-08/31/2023	2,553.00	2,553.00		2,553.00			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	01768028	939464 - Corner Bakery	211	8/1/2023	INS	Insurance	08/01/2023-08/31/2023	809.00	809.00		809.00			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	01768028	939464 - Corner Bakery	211	8/1/2023	RETX	Real Estate Tax (Escrow)	08/01/2023-08/31/2023	1,081.00	1,081.00		1,081.00			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	01768028	939464 - Corner Bakery	211	10/2/2023	FCAM	FB RCAM - 1.1.2023 - 8.31.23	01/01/2023-08/31/2023	-3,011.10	-3,011.10	-644.35	-2,366.75			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	01768028	939464 - Corner Bakery	211	10/2/2023	FINS	FB RINS - 1.1.2023 - 8.31.23	01/01/2023-08/31/2023	-5,603.55	-5,603.55	-1,199.11	-4,404.44			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022
2/22/2023	DE	176801 - Brea Gateway	Brixmor Brea Gateway LLC	01768028	939464 - Corner Bakery	211	10/2/2023	FRRET	FB FRRET - 1.1.2023 - 8.31.23	01/01/2023-08/31/2023	10,864.54	10,864.54	\$2,324.92	8,539.62			J - Bankrupt - Rejected	8/31/2023	6/30/2024	1/7/2022

Totals **87,848.33** **87,848.33** **38,820.53** **49,027.80** **202,654.20** **168,878.50**
1 Year 10 Months

Remark		Monthly Charges				
		Bill Code	Starting	Ending	Gross Amt	Months
Annual Minimum Rent		AMR	09/01/2023	06/30/2024	12,444.85	10
CAM (Escrow / Deposit)		CAM	09/01/2023	06/30/2024	2,553.00	10
Insurance		INS	09/01/2023	06/30/2024	809.00	10
Real Estate Tax (Escrow)		RETX	09/01/2023	06/30/2024	1,081.00	10
Total through end of lease						168,878.50

15%
15% of Remaining Rent 25,331.78

	Prepetition	Postpetition
Rejection Damages	202,654.20	
A/R Prepetition Arrearages	38,820.53	
Postpetition Arrearages		49,027.80
TOTAL CLAIMS	241,474.73	49,027.80