

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

In re:

REMINGTON OUTDOOR COMPANY, INC.,
et al.,¹

Debtors.

Chapter 11

Case No. 20-81688-CRJ11

Jointly Administered

**PLAN ADMINISTRATOR’S MOTION TO EXTEND THE TERMINATION DATE
OF THE CREDITOR TRUST AND TORT CLAIM SUB-TRUST**

COMES NOW, Gene Davis (the “**Plan Administrator**”), on behalf of Remington Outdoor Company, Inc. and its affiliated debtors (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), by and through his undersigned counsel, and hereby moves this Court (this “**Motion**”) for entry of an order substantially in the form of the proposed order attached hereto as **Exhibit A** (the “**Proposed Order**”) extending the termination date for the Creditor Trust and the Tort Claim Sub-Trust (collectively, the “**Trusts**”) as set forth herein, without prejudice to further extension requests. In support of this Motion, the Plan Administrator states as follows:

JURISDICTION

1. This Court has jurisdiction to consider this matter under 28 U.S.C. §§ 157 and 1334 and venue is proper under 28 U.S.C. §§ 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Remington Outdoor Company, Inc. (4491); FGI Holding Company, LLC (9899); FGI Operating Company, LLC (9774); Remington Arms Company, LLC (0935); Barnes Bullets, LLC (8510); TMRI, Inc. (3522); RA Brands, L.L.C. (1477); FGI Finance, Inc. (0109); Remington Arms Distribution Company, LLC (4655); Huntsville Holdings LLC (3525); 32E Productions, LLC (2381); Great Outdoors Holdco, LLC (7744); and Outdoor Services, LLC (2405).

2. The predicates for the relief requested herein are 11 U.S.C. § 105(a), Fed. R. Bankr. P. 9006(b)(1), and articles V.E and V.F of the Plan (as defined herein).

BACKGROUND

3. On July 27, 2020, the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code with this Court, commencing these Chapter 11 Cases. These Chapter 11 Cases are being jointly administered for procedural purposes only under Case No. 20-81688-CRJ11. *See* Docket No. 89.

4. On January 25, 2021, the Debtors filed the *Joint Chapter 11 Plan of the Debtors, the Official Committee of Unsecured Creditors, and Exit Term Loan Lenders* [Docket No. 1370] (as amended, supplemented, and/or modified, the “**Plan**”).²

5. On March 12, 2021, the Court entered the *Findings of Fact, Conclusions of Law, and Order Modifying and Confirming the Joint Chapter 11 Plan of the Debtors, the Official Committee of Unsecured Creditors, and Exit Term Loan Lenders* [Docket No. 1658] (the “**Confirmation Order**”), approving the Plan.

6. Pursuant to article V.E of the Plan, as confirmed by the Court, the Creditor Trust was established by the Creditor Trust Agreement to, among other things, administer the resolution, asset administration, and distribution process for Allowed Claims (as defined in the Plan). Similarly, pursuant to article V.F of the Plan, the Tort Claim Sub-Trust was established by the Creditor Trust Agreement to administer the resolution, asset administration, and distribution process for Tort Claims.

7. On March 31, 2021, the Debtors filed the *Notice of (i) Confirmation of Joint Chapter 11 Plan of the Debtors, the Official Committee of Unsecured Creditors, and Exit Term*

² All capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.

Loan Lenders and (ii) Occurrence of the Effective Date [Docket No. 1764], giving notice that the Effective Date of the Plan occurred on March 31, 2021.

8. Pursuant to the Creditor Trust Agreement, the Trusts terminate on, among other events not yet applicable, the fifth anniversary of the Effective Date. *See* Creditor Trust Agreement, §§ 7.1, 7.2. However, the Creditor Trust Agreement provides for an extension: “multiple fixed term extensions can be obtained so long as Bankruptcy Court approval is obtained within six (6) months before the expiration of the term of the Creditor Trust and each extended term.” *Id.* at § 7.1. *See also id.* at § 7.2.

9. The current termination date of the Trusts is March 31, 2026 (the “**Termination Date**”).

10. The Plan Administrator has been working diligently to finalize any remaining matters relating to the Trusts. Earlier this year, the Plan Administrator made a distribution to creditors. The Plan Administrator, however, continues to liquidate certain assets of the estate, and take further action. These actions include efforts to continue to enforce the agreement to sell equity interests in Sporting Activities Insurance Limited (“SAIL”), which remains unpaid by SAIL, and was the subject of the Plan Administrator’s motion at Docket Number 3125 and the Court’s order at Docket Number 3136. Additionally, the litigation related to the Tort Claim Sub-Trust remains active. Specifically, the case *Angelia Lamb, et. al v. Remington Arms Company, LLC, et al.*, No. 22AL-CC00099 (the “Lamb Litigation”), which is presently pending in Howell County Circuit Court in West Plains, Missouri, remains pending. A trial was set in the matter for January 6, 2026 but has now been continued to an as of yet unidentified date. Accordingly, an extension of the Trusts is required.

RELIEF REQUESTED

11. Absent an extension, the Trusts will terminate on March 31, 2026. By this Motion, the Plan Administrator respectfully requests entry of an order extending the Termination Date for the Trusts through and including March 31, 2027. While the Plan Administrator is hopeful that he will be able to complete any remaining matters related to the Trusts prior to the end of this extension, in an abundance of caution and to limit repeated extension requests, the Plan Administrator seeks a one year extension.

12. Fed. R. Bankr. P. 9006(b)(1) provides that “the court for cause shown may at any time in its discretion (1) with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order[.]” 11 U.S.C. § 105(a) provides the bankruptcy court with broad discretion to take actions necessary to administer the bankruptcy case. “Cause” is not defined by Fed. R. Bankr. P. 9006(b)(1), but “courts should be liberal in granting extensions of time sought before the period to act has elapsed, as long as the moving party has not been guilty of negligence or bad faith and the privilege of extensions has not been abused[.]” 10 *Collier on Bankruptcy* ¶ 9006.06 (16th 2021).

13. The Plan Administrator has worked diligently to fulfill the intent and purposes of the Trusts and has made significant progress in doing so. Such progress is still in process and an extension of the Termination Date is necessary.

14. The Plan Administrator submits that the requested extension is reasonable and necessary under the circumstances of these complex Chapter 11 Cases. Further, the request is not prejudicial to the Debtors’ creditors, as it permits the Plan Administrator additional time to resolve disputes and liquidate assets.

15. Accordingly, the Plan Administrator requests that (a) the Termination Date for the Creditor Trust be extended to March 31, 2027; and (b) the Termination Date for the Tort Claim Sub-Trust be extended to March 31, 2027.

NOTICE

16. Notice of this Motion will be provided in accordance with paragraph 129 of the Confirmation Order. The Plan Administrator believes that under the circumstances, such notice is sufficient and no other or further notice need be provided.

17. This is the Plan Administrator's eleventh request to this Court for the relief sought in this Motion in connection with these Chapter 11 Cases.

WHEREFORE, the Plan Administrator requests that this Court enter an order substantially in the form of the Proposed Order attached hereto as Exhibit A, extending the Termination Date for the Trusts as set forth herein, without prejudice to further extension requests by the Plan Administrator, and grant such other, further, and different relief as this Court deems just and proper.

Dated: January 29, 2026

/s/ Marc P. Soloman

BURR & FORMAN LLP

Derek F. Meek

Marc P. Soloman

420 20th Street North, Suite 3400

Birmingham, AL 35203

Telephone: (205) 251-3000

Facsimile: (205) 458-5100

Email: dmeek@burr.com

msoloman@burr.com

- and -

AKIN GUMP STRAUSS HAUER & FELD LLP

Sarah Link Schultz

2300 N. Field Street

Suite 1800

Dallas, TX 75201-2481
Telephone: (214) 969-2800
Facsimile: (214) 969-4343
Email: sschultz@akingump.com

Attorneys for the Plan Administrator

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

In re:

REMINGTON OUTDOOR COMPANY, INC.,
et al.,¹

Debtors.

Chapter 11

Case No. 20-81688-CRJ11

Jointly Administered

**ORDER APPROVING PLAN ADMINISTRATOR'S PLAN ADMINISTRATOR'S
MOTION TO EXTEND THE TERMINATION DATE OF THE []
TRUST AND [] TRUST**

This matter came before the Court for hearing upon the motion (the “**Motion**”)² [Docket No. ____] of Gene Davis (the “**Plan Administrator**”), on behalf of Remington Outdoor Company, Inc. and its affiliated debtors in these Chapter 11 Cases, for entry of an order extending the termination date (the “**Termination Date**”) for the Creditor Trust and the Tort Claim Sub-Trust (collectively, the “**Trusts**”). Upon consideration of the Motion, and having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and upon the record herein; and after due deliberation thereon and good and sufficient cause appearing therefor, it is **HEREBY ORDERED, ADJUDGED, AND DECREED that:**

1. The Motion is **APPROVED**.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Remington Outdoor Company, Inc. (4491); FGI Holding Company, LLC (9899); FGI Operating Company, LLC (9774); Remington Arms Company, LLC (0935); Barnes Bullets, LLC (8510); TMRI, Inc. (3522); RA Brands, L.L.C. (1477); FGI Finance, Inc. (0109); Remington Arms Distribution Company, LLC (4655); Huntsville Holdings LLC (3525); 32E Productions, LLC (2381); Great Outdoors Holdco, LLC (7744); and Outdoor Services, LLC (2405).

² All capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

2. The Termination Date is hereby extended to and including **March 31, 2027**.
3. Nothing in the Motion or this Order shall be deemed or construed as a waiver of the right or impairment of the ability of the Plan Administrator to make additional requests to further extend the Termination Date or any other deadline.
4. The extension of the Termination Date sought by the Plan Administrator and approved by the Court shall be without prejudice to the Plan Administrator right to seek further extensions of the Termination Date.
5. The Plan Administrator shall serve a copy of this Order on all parties served with the Motion pursuant to paragraph 129 of the Confirmation Order, including (a) the GUC Oversight Committee; (b) the Bankruptcy Administrator; and (c) any entity that has filed a renewed request for notice under Fed. R. Bankr. P. 2002 after the Effective Date.
6. This Court shall retain jurisdiction over all matters regarding the interpretation or implementation of this Order.

Dated this the _____ day of _____, 2026.

Hon. Clifton R. Jessup, Jr.
UNITED STATES BANKRUPTCY JUDGE