

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
OFFIT KURMAN, P.A. By: Paul J. Winterhalter, Esquire (006961986) Augustus T. Curtis (<i>pro hac vice</i> pending) Court Plaza South 21 Main Street, Suite 158 Hackensack, NJ 07601 Telephone: (267) 338-1370 Facsimile: (267) 338-1335 E-mail: pwinterhalter@offitkurman.com Augie.curtis@offitkurman.com <i>Proposed Counsel to Debtor</i>	
In re: BAKER & TAYLOR, LLC, <i>Debtor</i>	Chapter 11 Case No. 26-12863 (CMG) Judge: Christine M. Gravelle
	Hrg. Date: Mar 24, 2026 Time: 2:00 pm Location: 402 E. State Street Trenton, NJ 08608 Courtroom No. 2

**MOTION OF THE DEBTOR FOR ORDER GRANTING THE DEBTOR AN
EXTENSION OF TIME WITHIN WHICH TO FILE STATEMENTS AND SCHEDULES**

The above-captioned debtor and debtor in possession (the “Debtor”),¹ by and through its proposed counsel, Offit Kurman, P.A., hereby moves this Court (the “Motion”), pursuant to Section 521 of Title 11 of the United States Code and Rule 1007 of the Federal Rules of Bankruptcy Procedure, for entry of an order granting the Debtor an extension of time within which

¹ The last four digits of the Debtor’s tax identification number are 9974. The location of the Debtor’s principal place of business is 1120 Route 22 East, Bridgewater, NJ 08807, and the Debtor’s service address in this Chapter 11 case is Private Mailbox 191, 13000 South Tryon Street, Suite F, Charlotte, NC 28278.

to file its schedules, summary of assets and liabilities and certain statistical information, statement of financial affairs and other documents (the “Missing Documents”). In support of the Motion, the Debtor respectfully represents as follows:

Introduction

1. On March 16, 2026, the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, commencing the above-captioned chapter 11 case (the “Bankruptcy Case”) in the United States Bankruptcy Court for the District of New Jersey (the “Court”).

2. The Debtor remains in possession of property of the estate and management of its business affairs. No trustee or committee of creditors has been appointed in the case.

3. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This Motion is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory predicates for the relief requested herein are Section 521 of the Bankruptcy Code and Rule 1007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

Overview of the Debtor’s Financial Affairs

5. The Debtor formerly operated as a national book distribution business with locations in New Jersey, Georgia, North Carolina and Illinois. In 2025, the Debtor began a wind-down of its business operations, and is continuing the winddown process. As set forth below, the Debtor’s assets and financial affairs remain significant and complex.

6. Further information concerning the Debtor, its background and operations is available in the *Declaration of Amandeep S. Kochar in Support of the Chapter 11 Petition and First Day Motions*, which is being filed contemporaneously with this Motion.

Relief Requested

7. Pursuant to Bankruptcy Rule 1007(c), the Debtor's Missing Documents are due by March 30, 2026. By this Motion, the Debtor seeks an Order extending the time within which it must file the Missing Documents to April 20, 2026.

Basis for Relief

8. Pursuant to Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007, a debtor is required, within fourteen (14) days from the date of filing, to file schedules, summary of assets and liabilities and certain statistical information and statement of financial affairs. Bankruptcy Rule 1007(a)(5) and (c) further authorize the Court to extend a debtor's time to file the schedules, summary of assets and liabilities and certain statistical information and statement of financial affairs on motion for cause shown. The Debtor submits there is "cause" to extend the time to file its schedules, summary of assets and liabilities and certain statistical information, and statement of financial affairs.

9. The filing was made on an expedited basis. As such, the Debtor was unable to complete its schedules, summary of assets and liabilities and certain statistical information, and statement of financial affairs prior to filing. The Debtor's financial affairs are complex. The total number of creditors and parties-in-interest exceeds 1,900 and the total of all its debts exceed \$128 million. Since the Petition Date, the Debtor filed numerous first-day motions.

10. The Debtor and its counsel are in the process of compiling and reviewing the information necessary to complete the schedules, summary of assets and liabilities and certain statistical information and statement of financial affairs.

11. In order to complete the schedules, summary of assets and liabilities and certain statistical information, and statement of financial affairs, the Debtor must compile a significant amount of information from various sources. The Debtor will be unable to satisfactorily complete the compilation of the above information in order to file the schedules, summary of assets and liabilities and certain statistical information, and statement of financial affairs by March 30, 2026.

12. It is important that the schedules, summary of assets and liabilities and certain statistical information, and statement of financial affairs be complete and accurate, and that they fully evidence the financial condition of the Debtor as of the commencement of this case. The Debtor believes its will be able to gather all of the necessary information to complete the schedules, summary of assets and liabilities and certain statistical information and statement of financial affairs by April 20, 2026 – a three-week extension of time. The Debtor will attempt to file the Missing Documents before the new deadline.

[remainder of page intentionally left blank]

WHEREFORE, the Debtor respectfully requests that the Court enter an Order extending the time for Debtor to file its schedules, summary of assets and liabilities and certain statistical information, and statement of financial affairs through April 20, 2026, and such other and further relief as this Court deems just and proper.

Respectfully submitted,

OFFIT KURMAN, P.A.

By: /s/ Paul J. Winterhalter
Paul J. Winterhalter
Court Plaza South
21 Main Street, Suite 158
Hackensack, NJ 07601
Telephone: (267) 338-1370
Facsimile: (267) 338-1300
E-mail: pwinterhalter@offitkurman.com

Augustus T. Curtis
(*pro hac vice* Pending)
7501 Wisconsin Avenue, Suite 1000W
Bethesda, MD 20814
Telephone: (240) 507-1756
Facsimile: (240) 507-1723
E-mail: augie.curtis@offitkurman.com

Proposed Counsel to Debtor

Dated: March 16, 2026

4931-6502-9016, v. 3

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
OFFIT KURMAN, P.A. By: Paul J. Winterhalter, Esquire (006961986) Augustus T. Curtis (<i>pro hac vice</i> pending) Court Plaza South 21 Main Street, Suite 158 Hackensack, NJ 07601 Telephone: (267) 338-1370 Facsimile: (267) 338-1335 E-mail: pwinterhalter@offitkurman.com Augie.curtis@offitkurman.com <i>Proposed Counsel to Debtor</i>	
In re: BAKER & TAYLOR, LLC, <i>Debtor</i>	Chapter 11 Case No. 26-12863 (CMG) Judge: Christine M. Gravelle
	Hrg. Date: Mar. 24, 2026 Time: 2:00 pm Location: 402 E. State Street Trenton, NJ 08608 Courtroom: No. 3

**ORDER GRANTING THE DEBTOR AN EXTENSION TIME
WITHIN WHICH TO FILE STATEMENTS AND SCHEDULES**

The relief set forth on the following page is ORDERED.

Debtor: Baker & Taylor, LLC
Case No: 26-12863 (CMG)
Caption of Order: Order Authorizing The Debtor an Extension Time Within Which to File
Statements and Schedules

Upon consideration of the *Debtor's Motion for an Order Authorizing the Debtor an Extension of Time Within Which to File Statements and Schedules* (the "Motion"), filed by the above-captioned debtor and debtor in possession (the "Debtor"), and (a) the Court having jurisdiction under 28 U.S.C. § 1334 to consider the Motion; (b) the Court finding that the relief requested therein is warranted under Section 521 of Title 11 of the United States Code and Rule 1007 of the Federal Rules of Bankruptcy Procedure. It is therefore **ORDERED THAT:**

1. The Motion is GRANTED, as set forth herein.
2. The Debtor's time to file its schedules, summary of assets and liabilities, its statement of financial affairs and other documents is hereby extended through April 20, 2026.