

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re	Chapter 11
GUARDIAN ELDER CARE AT JOHNSTOWN, LLC, d/b/a/ RICHLAND HEALTHCARE AND REHABILITATION CENTER, <i>et al.</i> ,	Case No. 24-70299 (JAD)
	Jointly Administered
Debtors. ¹	
GUARDIAN ELDER CARE AT JOHNSTOWN, LLC, d/b/a/ RICHLAND HEALTHCARE AND REHABILITATION CENTER, <i>et al.</i> ,	Hearing Date: November 19, 2025 at 10:00 a.m. (ET) Objection Deadline: November 4, 2025 at 4:00 p.m. (ET)
v.	
NO RESPONDENT	

**SIXTH MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER
FURTHER EXTENDING THE DEBTORS' EXCLUSIVE PERIODS TO FILE
A CHAPTER 11 PLAN AND SOLICIT VOTES THEREON**

By this motion (this “**Motion**”), the debtors and debtors in possession (the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) seek the entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), pursuant to section 1121(d) of title 11 of the United States Code, 11 U.S.C. §§ 101 – 1532 (the “**Bankruptcy Code**”), (a) further extending the period in which the Debtors have the exclusive right to file a chapter 11 plan or plans (the “**Exclusive Filing Period**”) by approximately 75 days, through and including January 12, 2026; and (b) further extending the period in which the Debtors have the exclusive right to solicit acceptances of a chapter 11 plan or plans (the “**Exclusive Solicitation Period**,” and

¹ The last four digits of Guardian Elder Care at Johnstown, LLC d/b/a Richland Healthcare and Rehabilitation Center’s federal tax identification number are 7907. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/Guardian>. The Debtors’ mailing address is: 8796 Route 219, Brockway, Pennsylvania 15824.

together with the Exclusive Filing Period, the “**Exclusive Periods**”) by approximately 75 days, through and including March 16, 2026.² In support of this Motion, the Debtors respectfully represent as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Western District of Pennsylvania (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory basis for the relief requested herein are sections 105(a) and 1121(d) of the Bankruptcy Code.

Background

3. On July 29, 2024 (the “**Petition Date**”), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses and managing their affairs as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No party has requested the appointment of a trustee or examiner in these Chapter 11 Cases. On August 12, 2024, the United States Trustee for Region 3 appointed an official committee of unsecured creditors (the “**Committee**”).

4. A description of the Debtors’ businesses and the reasons for commencing these Chapter 11 Cases is set forth in the *Declaration of Allen D. Wilen in Support of First Day Motions for Relief* [D.I. 35] (the “**First Day Declaration**”).³

² Seventy five days after the requested Exclusive Filing Period and Exclusive Solicitation Period are January 10, 2026, and March 14, 2026, respectfully. However, because neither of these dates are business days, the Debtors seeks an extension to the following Monday for each deadline.

³ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the First Day Declaration.

5. As explained in the First Day Declaration, the Debtors and their non-debtor affiliates (together, “**Guardian Healthcare**”) are a private, family-owned organization that provided inpatient and outpatient services to predominately small and/or rural communities through a network of skilled nursing facilities and personal care homes. As of the Petition Date, Guardian Healthcare maintained nineteen (19) skilled nursing facilities, with one facility in West Virginia and the remaining facilities located in Pennsylvania. These facilities are broken into two different portfolios: the Cuarzo Portfolio and the Owned Facilities Portfolio.

6. A primary objective in these chapter 11 cases has been the sale and/or transfer of the facilities in the Cuarzo and the Owned Facilities Portfolios, and the Debtors’ liquidity constraints required them to act quickly with respect to such objectives.

A. The Cuarzo and Owned Facilities Portfolios

7. The Cuarzo Portfolio: As of the Petition Date, the Cuarzo Portfolio consisted of eleven (11) different limited liability companies that each operated skilled nursing facilities located in Pennsylvania. On September 24, 2024, the Court entered an order [D.I. 557] (the “**Cuarzo Sale Order**”), pursuant to which the Court authorized the sale (the “**Cuarzo Sale**”) of substantially all assets of the Cuarzo Portfolio Debtors to the New Operators in accordance with the OTA (both as defined in the Cuarzo Sale Order). The Cuarzo Sale closed on October 29, 2024 [D.I. 860].

8. The Owned Facilities Portfolio: As of the Petition Date, the Owned Facilities Portfolio consisted of: (i) eight (8) entities that operated skilled nursing facilities, and (ii) eight (8) entities that owned and leased the real property on which each of the respective OpCos operated.

9. On October 30, 2024, the Court entered an order approving the sale of substantially all assets of the Debtors within the Owned Facilities Portfolio [D.I. 820] (the “**Owned Sale Order**”), pursuant to which the Court, among other things, authorized the sale (the “**Owned Sale**”)

of substantially all assets, and transfer operations, of the Owned Facilities Portfolio to GBK Eight LLC and its designated assignees (the “**GBK Buyer**”). The Owned Sale was structured to have two separate closings, one for the Non-HUD Facilities and a second for the HUD Facilities (both of which are defined in the Owned Sale Order). The closing for the Non-HUD Facilities (the “**Non-HUD Owned Sale Closing**”) occurred on December 13, 2024 [D.I. 1100], and the closing for the HUD Facilities (the “**HUD Owned Sale Closing**”) occurred on April 24, 2025 [D.I. 1638].

B. The Management and Ancillary Companies

10. In addition to their skilled nursing operations, the Debtors also included certain Management Companies that provide or provided management services in connection with its skilled nursing and other businesses, and certain ancillary entities that provide (or provided), *inter alia*, pharmacy and rehabilitation services, primarily to residents of the skilled nursing facilities.

11. During these chapter 11 cases, the Debtors wound down their pharmacy operations in the manner described in the *Debtors’ Motion for an Order (I) Authorizing Debtors to (A) Discontinue Pharmacy Operations, (B) Reject Supply Agreements and Return or Dispose of Pharmacy Inventory, (C) Reject Pharmacy Lease and Abandon De Minimis Property Located Thereon, (D) Honor Severance Obligations to Employees, and (E) Sell Pharmacy-Related Equipment, Free and Clear of All Liens, Claims, Interests and Encumbrances; and (II) Granting Related Relief* [D.I. 925], which was approved by the Court on December 9, 2024 [D.I. 999].

12. Now that the Debtors have sold substantially all of their assets, transferred operations with respect to all nineteen of their skilled nursing facilities, and wound down their pharmacy operations, the Debtors are focused on determining the most appropriate path forward in these cases.

C. The Debtors' Exclusivity Periods

13. On December 9, 2024, the Court entered an order [D.I. 994], under which the Debtors' Exclusive Filing Period was extended by 120 days to March 26, 2025, and the Debtors' Exclusive Solicitation Period was extended by 120 days to May 27, 2025.

14. On April 23, 2025, the Court entered a further order [D.I. 1629], under which the Debtors' Exclusive Filing Period was extended by 65 days to May 30, 2025, and the Debtors' Exclusive Solicitation Period was extended by 65 days to July 31, 2025.

15. On June 18, 2025, the Court entered a further order [D.I. 1884], under which the Debtors' Exclusive Filing Period was extended by 45 days to July 14, 2025, and the Debtors' Exclusive Solicitation Period was extended by 45 days to September 15, 2025.

16. On August 26, 2025, the Court entered a further order [D.I. 2189] (the “**August 26 Order**”), under which the Debtors' Exclusive Filing Period was extended by 45 days to August 28, 2025, and the Debtors' Exclusive Solicitation Period was extended by 45 days to October 30, 2025. The August 26 Order expressly provides for the Debtors and the Committee to work in good faith and to use commercially reasonable efforts to facilitate the scheduling and conducting of the referenced mediation or before October 27, 2025 (the “**Mediation Deadline**”) during which time “the Debtors shall (i) subject to approval of the Court, maintain the exclusive right to file a chapter 11 plan and solicitation thereafter, and (ii) refrain, to the extent possible, from seeking to convert or dismiss these chapter 11 cases, *provided, however*, that if mediation cannot be scheduled and conducted prior to the Mediation Deadline, all parties' rights are reserved with respect to exclusivity, conversion and/or dismissal, including, but not limited to, the Committee's right to seek an expedited hearing on any of the foregoing.” See August 26 Order, ¶ 4.

17. On September 25, 2025, the Court entered a further order [D.I. 2307], under which the Debtors' Exclusive Filing Period was extended by 60 days to October 27, 2025, and the Debtors' Exclusive Solicitation Period by 60 days to December 29, 2025.

18. To ensure that these Chapter 11 Cases continue to progress in an effective and efficient manner, the Debtors seek the further extensions requested to work with the Committee to facilitate a potential mediation and otherwise formulate the most appropriate path forward in these cases.

Relief Requested

19. By this Motion, the Debtors seek the entry of an Order, pursuant to sections 105(a) and 1121(d) of the Bankruptcy Code, (a) extending the Debtors' Exclusive Filing Period by approximately 75 days, through and including January 12, 2026, and (b) extending the Debtors' Exclusive Solicitation Period by approximately 75 days, through and including March 16, 2026.

Basis for Relief Requested

20. Section 1121(b) of the Bankruptcy Code provides that "only the debtor may file a plan until after 120 days after the date of the order for relief under this chapter." 11 U.S.C. § 1121(b). Sections 1121(c)(2) and (3) further provide, in relevant part, that a party in interest may file a plan if and only if "the debtor has not filed a plan before 120 days after the date of the order for relief under this chapter" or "the debtor has not filed a plan that has been accepted, before 180 days after the date of the order for relief." *See* 11 U.S.C. § 1121(c)(2)–(3).

21. Section 1121(d)(1) provides, in relevant part:

[O]n request of a party in interest made within the respective periods in subsections (b) and (c) of this section and after notice and a hearing, the court may for cause reduce or increase the 120-day period or the 180-day period referred to in this section.

11 U.S.C. § 1121(d)(1).

22. Pursuant to section 1121(d)(2), the 120-day Exclusive Filing Period may not be extended beyond a date that is 18 months after the Petition Date, and the 180-day Exclusive Solicitation Period may not be extended beyond a date that is 20 months after the Petition Date. *See* 11 U.S.C. § 1121(d)(2). In the present case, the requested extensions of the Exclusive Periods, if granted, do not extend beyond these deadlines. Thus, this Motion is consistent with the requirements of Bankruptcy Code section 1121(d)(2).

I. A Court May Extend the Exclusive Periods for “Cause” under Section 1121(d) of the Bankruptcy Code

23. As indicated above, section 1121(d)(1) of the Bankruptcy Code provides that a court may extend Exclusive Periods for “cause” shown. *See* 11 U.S.C. § 1121(d); *In re Pine Run Trust, Inc.*, 67 B.R. 432, 433 (Bankr. E.D. Pa. 1986). The term “cause” is not defined in the Bankruptcy Code; rather, courts have broad discretion to determine “cause” based on the facts and circumstances of each case. *See First Am. Bank of N.Y. v. Southwest Gloves & Safety Equip., Inc.*, 64 B.R. 963, 965 (D. Del. 1986) (stating that section 1121(d)(1) provided the bankruptcy court with flexibility to increase the period of exclusivity in its discretion); *see also In re Burns and Roe Enters., Inc.*, No 00-41610 (RG), 2005 WL 6289213, at *3–4 (D.N.J. Nov. 2, 2005); *In re Sharon Steel Corp.*, 78 B.R. 762, 763–65 (Bankr. W.D. Pa. 1987).

24. Legislative history also makes clear that the term “cause” is intended to be a flexible standard aimed at balancing the competing interests of a debtor and its creditors. *See* H.R. Rep. No. 95-595 at 231–32 (1978). The purpose of exclusivity is to “promote an environment in which the debtor’s business may be rehabilitated and a consensual plan may be negotiated.” *See* H.R. Rep. No. 95-595, at 36 (1994); *Burns and Roe*, 2005 WL 6289213, at *4. Accordingly, to fulfill Congress’s legislative intent, debtors should be granted a reasonable opportunity to remain in

control for a period of time to prepare adequate financial and non-financial information regarding the outcome of any proposed plan for disclosure to creditors. *See In re McLean Indus., Inc.*, 87 B.R. 830, 833-34 (Bankr. S.D.N.Y. 1987); *see also In re All Seasons Indus., Inc.*, 121 B.R. 1002, 1006 (Bankr. N.D. Ind. 1990) (“One of the most important reasons for extending the debtor’s period of exclusivity is to give the chapter 11 process of negotiation and compromise an opportunity to be fulfilled, so that a consensual plan can be proposed and confirmed without opposition.”).

25. To determine whether cause exists to extend the Exclusive Periods, courts consider several non-exclusive factors, including: (i) the size and complexity of a case; (ii) the debtor’s need for sufficient time to negotiate a plan and prepare adequate information; (iii) the existence of good faith progress toward reorganization; (iv) whether the debtor is paying its bills as they come due; (v) whether the debtor has shown a reasonable likelihood of proposing a viable plan; (vi) the progress the debtor has made in negotiating with its creditors; (vii) the amount of time that has elapsed in the case; (viii) whether the debtor is seeking an extension of the exclusive periods to pressure creditors to submit to the debtors’ reorganization demands; and (ix) whether any unresolved contingencies exist. *See, e.g., In re Adelpia Comm. Corp.*, 352 B.R. 578, 587 (Bankr. S.D.N.Y. 2006); *In re Dow Corning Corp.*, 208 B.R. 661, 664–65 (Bankr. E.D. Mich. 1997); *In re Express One Int’l, Inc.*, 194 B.R. 98, 100 (Bankr. E.D. Tex. 1996). No single factor is dispositive in determining whether to extend exclusivity; rather, courts can choose to rely on only a few factors or even altogether differing factors. *See In re Elder-Beerman Stores Corp.*, No. C-3-97-175, 1997 WL 1774880, at *4 (S.D. Ohio June 23, 1997); *Dow Corning*, 208 B.R. at 669–70 (noting that sometimes certain factors are more important or relevant than others).

26. As set forth below, consideration of these factors demonstrates that ample cause exists to grant the Debtors' requested extensions of the Exclusive Periods.

II. Cause Exists to Extend the Exclusive Periods

A. The Debtors Cases Are Large and Complex

27. By any measure, the Debtors' Chapter 11 Cases are large and complex. These cases involve forty-four (44) separate debtors and include operating entities, real estate entities, management entities and ancillary service providers. As of the Petition Date, the Debtors' employed over 2,000 people and maintained more than 1,700 nursing, personal care and independent living beds.

28. The Chapter 11 Cases involved two separate sale processes, one of which involved the termination of a Court approved stalking horse agreement and a full day, contested sale hearing. Further, the Chapter 11 Cases involved three different secured lenders, necessitating separate debtor-in-possession loans for the Cuarzo Portfolio Debtors and the Owned Portfolio Debtors. Finally, the skilling nursing home industry is highly regulated, adding a layer of complexity that is not present in most chapter 11 cases. Accordingly, the size and complexity of these Chapter 11 Cases warrants a further extension of the Exclusive Periods.

B. The Debtors Have Made Good Faith Progress in these Chapter 11 Cases

29. The Debtors' good faith progress in these Chapter 11 Cases warrants the extensions requested herein. The Debtors' primary goal in these Chapter 11 Cases has always been to transition their nursing home operations safely and efficiently to viable operators. The Debtors have now achieved this overriding goal with the closing of the HUD Facilities.

30. In recent months, and since the HUD Owned Sale Closing, the Debtors have been focused on a multitude of critical tasks, including, among other things (i) addressing a multitude

of post-closing issues; (ii) addressing creditor and personal injury claimant inquiries; (iii) working with utility providers to terminate services no longer required, address outstanding balances, and seeking the return of utility deposits; (v) seeking and obtaining Court approval of the rejection of executory contracts and unexpired leases no longer required by the estates; (vi) responding to motions seeking relief from the automatic stay to proceed with various litigation matters; (vii) engaging in discussions with counsel to the Committee on case wind-down alternatives, and funding issues; and (vii) otherwise attending to tasks required to administer these complex Chapter 11 Cases. The Debtors have also engaged with certain constituents – including S&T Bank and DHS – regarding the significant pending claims asserted by such parties, particularly given the anticipated concessions that may be needed from such parties to permit the development and confirmation of a viable liquidating plan.

31. In addition to the foregoing, on May 16, 2025, the Committee filed Adversary Proceeding Number 25-07005 (JAD) against Public Credit, LLC (“**Public Credit**”), one of the Owned Portfolio Debtors’ pre and post-Petition Date lenders, challenging the payoff of its \$4 million pre-petition secured claim, which was “rolled up” as part of the *Final Order (I) Authorizing the Owned Portfolio/Ancillary Debtors to Obtain Postpetition Financing; (II) Granting Liens and Providing Superpriority Administrative Expense Status; (III) Authorizing the Use of KeyBank’s, Public Credit’s and S&T Bank’s Cash Collateral; (IV) Granting Adequate Protection; (V) Modifying the Automatic Stay; and (VI) Granting Related Relief* [Doc. No. 434]. On July 18, 2025, Public Credit filed a motion to dismiss the complaint, which motion remains pending.

32. The Committee has recently asserted, by letter, certain claims (the “**Alleged Estate Claims**”). While the Alleged Estate Claims are disputed, in accordance the August 26 Order, the

Debtors and the Committee are working diligently to pursue a mediation of the claims asserted against Public Credit and the Committee's Alleged Estate Claims as soon as possible.

33. While the Debtors remain focused on these issues, more time is needed for the Debtors, in consultation with S&T Bank and the Committee to address the issues outlined above, to pursue the mediation noted above, and otherwise determine the best path forward for these Chapter 11 Cases. The Debtors thus seek further extension of the Exclusive Periods.

C. The Chapter 11 Cases Have Been Pending for a Short Period of Time

34. In the period that these cases have been pending, the Debtors have made, and continue to make, significant progress. The Debtors have already accomplished their key objectives in these cases and do not seek to belabor these cases beyond the time needed to wind down the estates in a responsible, efficient and cost-effective matter. The requested extensions of the Exclusive Periods will provide the Debtors with the time needed to address the issues described herein and thereby permit the Debtors to focus on both resolving such issues in a manner that best serves their estates and creditors and establishing a framework for a viable path forward without the distraction of a looming exclusivity deadline.

D. No Prejudice to Creditors

35. The Debtors do not believe that the modest further extension of the Exclusive Periods requested herein will harm the Debtors' creditors or other parties in interest. On the contrary, the Debtors have conducted these Chapter 11 Cases in an efficient manner, for the benefit of residents, creditors and other parties in interest. In addition, the Debtors are not seeking this extension to prejudice their creditors or to otherwise pressure creditors to submit to reorganization demands. Instead, the Debtors seek the requested extension so that they can maintain the status quo in these Chapter 11 Cases while continuing to work with their key constituents on the

appropriate path forward for the Debtors' cases and the appropriate structure for any plan. In particular, as noted above, the requested extension is consistent with the proposed mediation noted above. Thus, because neither the Debtors' creditors nor any other party in interest will be prejudiced by the proposed extension of the Exclusive Periods, the Debtors submit that the relief requested should be approved.

36. Lastly, although the Debtors hope to be in a position to file a chapter 11 plan of liquidation within the extended Exclusive Filing Period, the Debtors reserve the right to request further extensions of the Exclusive Periods for cause.

Notice

37. Notice of this Motion will be given to the following parties, or in lieu thereof, to their counsel: (i) the Office of the United States Trustee; (ii) counsel to the Committee; (iii) counsel to S&T Bank; (iv) counsel to the Cuarzo Landlords; (v) counsel to KeyBank, N.A.; (vi) counsel to Public Credit; (vii) the Pennsylvania Department of Health; (viii) counsel to DHS; (ix) the United States Attorney for the Middle and Western Districts of Pennsylvania and the Northern District of West Virginia; (x) the offices of the attorneys general for the states in which the Debtors operate; (xi) the Internal Revenue Service; (xii) the Unions (as defined in the First Day Declarations); and (xiii) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested herein, the Debtors submit that no other or further notice is necessary.

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WHEREFORE, the Debtors respectfully request entry of an order, substantially in the form annexed hereto at **Exhibit A**: (i) extending the Debtors' Exclusive Filing Period by approximately 75 days, through and including January 12, 2026; (ii) extending the Debtors' Exclusive Solicitation Period by approximately 75 days, through and including March 16, 2026; and (iii) granting the Debtors such other and further relief as is just and proper.

Dated: October 21, 2025

SAUL EWING LLP

By: /s/ Jeffrey C. Hampton

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Counsel for Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re	Chapter 11
GUARDIAN ELDER CARE AT JOHNSTOWN, LLC, d/b/a/ RICHLAND HEALTHCARE AND REHABILITATION CENTER, <i>et al.</i> ,	Case No. 24-70299 (JAD)
	Jointly Administered
Debtors. ¹	
GUARDIAN ELDER CARE AT JOHNSTOWN, LLC, d/b/a/ RICHLAND HEALTHCARE AND REHABILITATION CENTER, <i>et al.</i> ,	Related to Docket Nos.:
v.	
NO RESPONDENT	

**ORDER PURSUANT TO 11 U.S.C. § 1121 FURTHER EXTENDING
THE DEBTORS' EXCLUSIVE PERIODS TO FILE
A CHAPTER 11 PLAN AND SOLICIT VOTES THEREON**

Upon the motion (the “**Motion**”)² of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order, pursuant to section 1121(d) of the Bankruptcy Code, (a) further extending the Debtors’ Exclusive Filing Period by approximately 75 days, through and including January 12, 2026, and (b) extending the Debtors’ Exclusive Solicitation Period by approximately 75 days, through and including March 16, 2026; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this matter being a “core” proceeding under 28 U.S.C. § 157(b); and venue being proper before this Court under 28 U.S.C.

¹ The last four digits of Guardian Elder Care at Johnstown, LLC d/b/a Richland Healthcare and Rehabilitation Center’s federal tax identification number are 7907. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/Guardian>. The Debtors’ mailing address is: 8796 Route 219, Brockway, Pennsylvania 15824.

² Any and all terms not defined herein shall have the meaning ascribed to them in the Motion.

§§ 1408 and 1409; and due and proper notice of the Motion having been provided to the parties listed therein, and it appearing that no other or further notice need be provided; and the Court being satisfied that the relief sought in the Motion is in the best interests of the Debtors, their creditors and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon review of the Motion and all the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. Pursuant to section 1121(d) of the Bankruptcy Code, the period in which the Debtors have the exclusive right to file a chapter 11 plan or plans is further extended through and including January 12, 2026.

2. Pursuant to section 1121(d) of the Bankruptcy Code, the period in which the Debtors have the exclusive right to solicit acceptances of a chapter 11 plan or plan is further extended through and including March 16, 2026.

3. The entry of this Order is without prejudice to the Debtors' right to seek a further extension of the Exclusive Periods under section 1121 of the Bankruptcy Code.

4. This Court shall retain jurisdiction to hear and determine all matters arising from, or related to, the interpretation or implementation of this Order.

Dated: _____, 2025

HONORABLE JEFFERY A. DELLER
UNITED STATES BANKRUPTCY JUDGE