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Counsel to the Reorganized Debtors

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

In re:

ZIPS CAR WASH, LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-80069 (MVL)
)
) (Jointly Administered)
)

**JOINT MOTION OF THE REORGANIZED DEBTORS AND GUC TRUSTEE
FOR ENTRY OF AN ORDER EXTENDING DEADLINE TO OBJECT TO CLAIMS**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE
IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT
1100 COMMERCE STREET, DALLAS, TEXAS 75242 BEFORE CLOSE OF BUSINESS**

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors' federal tax identification numbers, are Zips Car Wash, LLC (3045); Express Car Wash Holdings, LLC (6223); Zips 2900 Wade Hampton, LLC (N/A); Zips 3107 N. Pleasantburg, LLC (N/A); Zips 6050 Wade Hampton, LLC (N/A); Zips Operating Holdings, LLC (2161); Zips Portfolio I, LLC (9999); Zips Portfolio II, LLC (1864); Zips Portfolio III, LLC (N/A) and Zips Portfolio IV, LLC (N/A). The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is 8400 Bellevue Drive, Suite 210, Plano, Texas 75024.

ON NOVEMBER 3, 2025, WHICH IS AT LEAST 24 DAYS FROM THE DATE OF SERVICE THEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTIES PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

Zips Car Wash, LLC and its affiliated reorganized debtors (collectively, the “Reorganized Debtors”) and the GUC Trustee, by and through their respective counsel, hereby submit this joint motion (this “Joint Motion”) for entry of an order extending the deadline to object to Claims, including Administrative Claims, pursuant to the *Third Amended Joint Plan of Reorganization of Zips Car Wash, LLC and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 365] (as amended, supplemented, or otherwise modified from time to time, the “Plan”)² from October 27, 2025 to and including April 25, 2026 (the “Proposed Deadline”), pursuant to sections 502 and 105(a) of title 11 of the United States Code (as amended, the “Bankruptcy Code”), and Rules 3007 and 9006 of the Federal Rules of Bankruptcy Procedure (as amended, the “Bankruptcy Rules”), without prejudice to the Reorganized Debtors’ and the GUC Trustee’s ability to seek further extensions. In support of this Joint Motion, the Reorganized Debtors and the GUC Trustee respectfully represent as follows:

RELIEF REQUESTED

1. By this Joint Motion, the Reorganized Debtors and GUC Trustee seek entry of an order substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), extending the

² Any capitalized term used but not defined herein shall have the meaning ascribed to it in the Plan.

Administrative Claim Objection Bar Date and the Claims Objection Deadline for an additional 180 days to and including April 25, 2026, without prejudice to the Reorganized Debtors' and the GUC Trustee's rights to seek additional extensions.

2. Since the Plan Effective Date (as defined below), the Reorganized Debtors and the GUC Trustee have been working diligently and collaboratively on multiple open issues relating to the consummation of the Plan, including with respect to analyzing and reconciling Claims filed against the Reorganized Debtors' estates. Since the Plan's Effective Date, the Reorganized Debtors and the GUC Trustee have made substantial progress on the reconciliation of asserted Claims, including through the filing of the Reorganized Debtors' first omnibus objection, filed contemporaneously herewith, *The GUC Trust's First Omnibus Objection to Claims Pursuant to Section 502(B) of The Bankruptcy Code and Rule 3007 of The Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims (Duplicate Claims)* [Docket No. 546], *The GUC Trust's Second Omnibus Objection to Claims Pursuant to Section 502(B) of The Bankruptcy Code and Rule 3007 of The Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims (Amended/Superseded Claims)* [Docket No. 588], *The GUC Trust's Third Omnibus Objection to Claims Pursuant to Section 502(B) of The Bankruptcy Code and Rule 3007 of The Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims (Assumed Lease Claims And Assumed Contract Claims)* [Docket No. 593], *The GUC Trust's Fourth Omnibus Objection to Claims Pursuant to Section 502(B) of The Bankruptcy Code and Rule 3007 of The Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims (Paid/Satisfied Claims)* [Docket No. 595], and the consensual resolution of potential objections to Claims.

3. There remains significant work to be done to resolve potential Claims, and, as such, the Reorganized Debtors and the GUC Trustee require an extension of both the Administrative

Claim Objection Bar Date and the Claims Objection Deadline, respectively. The claims register maintained by the Reorganized Debtors' Claims and Noticing Agent, reflects approximately 431 unresolved Claims filed in these Chapter 11 Cases totaling over \$64 million in the aggregate. Pursuant to the Plan, the Reorganized Debtors and the GUC Trustee are authorized to control and effectuate the claims-reconciliation process, including by objecting to, reclassifying, estimating, reconciling, settling, or otherwise resolving such Claims. The request to extend the Administrative Claim Objection Bar Date and the Claims Objection Deadline to the Proposed Deadline, subject to any further requests for extension, will allow the Reorganized Debtors and the GUC Trustee to continue working on consensual resolutions, thus avoiding objections that may otherwise prove unnecessary.

JURISDICTION AND VENUE

4. The United States Bankruptcy Court for the Northern District of Texas (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334. The District Court's jurisdiction has been referred to this Court pursuant to 28 U.S.C. § 157 and the District Court's Miscellaneous Order No. 33, *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc* dated August 3, 1984. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The Reorganized Debtors and the GUC Trustee consent to the entry of a final order or judgment by the Court in connection with this Joint Motion if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

6. The statutory and other bases for the relief requested in this Joint Motion are section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9006.

BACKGROUND

7. On February 5, 2025 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the Court (the “Chapter 11 Cases”).

8. On April 18, 2025, the Court confirmed the Plan and entered the *Order (I) Approving the Debtors’ Disclosure Statement and (II) Confirming the Third Amended Joint Plan of Reorganization of Zips Car Wash, LLC and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 366] (the “Confirmation Order”).

9. On April 30, 2025 (the “Plan Effective Date”), the Plan went effective pursuant to the terms of the Plan and the Confirmation Order. *See* Docket No. 417.

10. Pursuant to the Plan, following the Plan Effective Date, each of the Reorganized Debtors and the GUC Trustee (solely with respect to General Unsecured Claims) are responsible for reconciling and, if necessary, objecting to Claims. *See* Plan, Art. VII.B.

11. The Claims Objection Deadline and the Administrative Claim Objection Bar Date were each originally set as October 27, 2025 under the Plan.³

12. As of September 15, 2025, there were 476 proofs of claims filed, asserting approximately \$65 million in the aggregate. Of those, 365 have been for General Unsecured Claims asserting approximately \$58,818,552.03 in the aggregate. To date, the Reorganized Debtors have filed one omnibus objection (asserting either no liability for such claims, that such claims have been satisfied, or that such claims have been amended and replaced), and the GUC Trustee has filed four objections (asserting that such claims are either duplicative or have been amended and superseded, assumed and cured or fully paid or otherwise satisfied), which if

³ The original deadline set forth in the Plan for each of the Claims Objection Deadline and the Administrative Claim Objection Bar Date is 180 days following the Plan Effective Date. *See* Plan, Art. I.A.23. and Art. I.A.5., respectively.

approved would reduce the claims pool by \$35 million in the aggregate, of which approximately \$32 million would be on account of unsecured claims.⁴

13. While significant progress has been made to date with the Reorganized Debtors and the GUC Trustee identifying and proposing to reduce the asserted Claims pool, there is still additional work that needs to be done. Given the sheer volume of the claims that have been filed, the Reorganized Debtors and the GUC Trustee are still in the process of reviewing such claims and anticipate needing additional time to either resolve claims consensually or to file additional claims objections. Accordingly, a further extension of the Claims Objection Deadline and Administrative Claim Objection Bar Date would be in the best interest of all parties in interest.

BASIS FOR RELIEF

14. Pursuant to section 502(a) of the Bankruptcy Code, “a claim or interest ... is deemed allowed, unless a party in interest ... objects.”

15. Bankruptcy Rule 9006(b)(1) provides that the Court may extend a time period provided under the Bankruptcy Rules or order of the Court, other than with respect to time periods provided under certain Bankruptcy Rules that are not applicable here. *See* Fed. R. Bankr. P. 9006(b)(1).

16. In addition, section 105(a) of the Bankruptcy Code provides that “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.”

17. The Reorganized Debtors and the GUC Trustee respectfully submit that cause exists to extend the Administrative Claim Objection Bar Date and the Claims Objection Deadline

⁴ In addition, the GUC Trustee was able to reduce one disputed claim consensually via stipulation and order, further reducing the unsecured claims pool by \$1.0 million, for a total reduction of \$33 million and more than 53% of the unsecured claims pool.

to the Proposed Deadline. Many of the Claims contain multiple components and require careful review by the Reorganized Debtors and the GUC Trustee and their respective professionals. Although the Reorganized Debtors and the GUC Trustee have made some progress in the reconciliation effort, the Reorganized Debtors and the GUC Trustee require additional time to analyze, liquidate, and reconcile the Claims due to the large volume of Claims, which as noted above includes approximately 431 proofs of claims, totaling over \$64 million in value. Likewise, an extension will also allow the Reorganized Debtors and the GUC Trustee to continue to engage with claimants to resolve issues consensually and potentially avoid the burden and expense of contested claim-objection litigation.

NO PRIOR REQUEST

18. No prior request for the relief sought in this Joint Motion has been made to this Court or any other court.

NOTICE

19. The Reorganized Debtors and the GUC Trustee will provide notice of this Joint Motion to the following parties or their respective counsel: (a) the U.S. Trustee for the Northern District of Texas; and (b) any party that has requested notice pursuant to Bankruptcy Rules 2002 or receiving notice through the Court's ECF system. In light of the nature of the relief requested, the Reorganized Debtors and the GUC Trustee submit that no further notice is required.

Dated: October 9, 2025
Dallas, Texas

Respectfully submitted,

/s/ Charles Persons

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Counsel to the Zips GUC Trust

Certificate of Service

I certify that on October 9, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Charles Persons

Charles Persons

EXHIBIT A

Proposed Order

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

In re:

ZIPS CAR WASH, LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-80069 (MVL)
)
) (Jointly Administered)
)

ORDER EXTENDING DEADLINE TO OBJECT TO CLAIMS

Related Docket No. ____

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors' federal tax identification numbers, are Zips Car Wash, LLC (3045); Express Car Wash Holdings, LLC (6223); Zips 2900 Wade Hampton, LLC (N/A); Zips 3107 N. Pleasantburg, LLC (N/A); Zips 6050 Wade Hampton, LLC (N/A); Zips Operating Holdings, LLC (2161); Zips Portfolio I, LLC (9999); Zips Portfolio II, LLC (1864); Zips Portfolio III, LLC (N/A) and Zips Portfolio IV, LLC (N/A). The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is 8400 Bellevue Drive, Suite 210, Plano, Texas 75024.

On this date, the Court considered the *Joint Motion of the Reorganized Debtors and the GUC Trustee for Entry of An Order Extending Deadline to Object to Claims* (the “Joint Motion”)² jointly filed by the Reorganized Debtors and the GUC Trustee; and the Court having jurisdiction to consider the Joint Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Joint Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that no other or further notice need be provided; and the Court having reviewed the Joint Motion; and the Court having found and determined that the legal and factual bases set forth in the Joint Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Joint Motion is granted.
2. The Administrative Claim Objection Bar Date and Claims Objection Deadline shall be and hereby are each extended to and include April 25, 2026, without prejudice to the Reorganized Debtors’ and GUC Trustee’s rights to seek additional extensions.
3. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

END OF ORDER

² Any capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion or the Plan, as applicable.

ORDER SUBMITTED BY:

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