

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF KANSAS (TOPEKA DIVISION)**

	§	
In re:	§	Chapter 11
	§	
LODGING ENTERPRISES, LLC,	§	Case No. 24-40423
	§	
Debtor.	§	

**WITHDRAWAL OF WYNDHAM FRANCHISORS' LIMITED OBJECTION TO
ASSUMPTION AND CURE OF FRANCHISE AGREEMENTS**

On or about October 16, 2025, Travelodge Hotels, Inc. ("THI"), Baymont Franchise Systems, Inc. ("BFS") and Super 8 Worldwide, Inc.'s ("SWI") and, together with THI and BFS, the "Wyndham Franchisors") filed a limited objection (the "Limited Objection") [Docket No. 615] to the Notice to Contract Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases and Cure Amounts filed by the Debtor. Since the filing of the Limited Objection, the parties have worked diligently to address the issues raised therein and Wyndham Franchisors and Purchaser Wilmington Trust, National Association, as Trustee for the Benefit of the Registered Holders of USB Commercial Mortgage Trust 2019-C18, Commercial Mortgage Pass-Through Certificates, Series 2019-C18, and in its Capacity as Lead Securitization Note Holder, and on Behalf of the Related Service Companion Noteholders ("Purchaser") have reached an agreement as to the terms and conditions of the assumption of the Franchise Agreements by the Debtor and the assignment thereof to Purchaser.

The terms of that agreement are set forth in a separate Stipulation executed by the parties and submitted to the Court for entry on the docket simultaneously herewith.

Based on and pursuant to the Stipulation, Wyndham Franchisors hereby withdraw the Limited Objection [Docket No. 615].

Respectfully submitted,

By: /s/ David S. Catuogno

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*COUNSEL FOR TRAVELODGE HOTELS, INC.,
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FRANCHISE SYSTEMS, INC.*

CERTIFICATE OF SERVICE

I certify that on October 20, 2025, a true and correct copy of this **Notice of Withdrawal** was electronically filed with the Court using the CM/ECF system, which sends notification to all parties of interest participating in this case through the CM/ECF system.

By: /s/ David S. Catuogno

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