

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: DREAMWELL, LTD., Reorganized Debtor.¹	§ § § § § §	Chapter 11 Case No. 23-90024 (CML)
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**REORGANIZED DEBTOR’S MOTION FOR AN
ORDER FURTHER EXTENDING DEADLINE TO OBJECT TO CLAIMS**

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT [HTTPS://ECF.TXSB.USCOURTS.GOV/](https://ecf.txsb.uscourts.gov/) WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

Dreamwell, Ltd. (the “**Reorganized Debtor**”), on behalf of itself and the Reorganized Debtors (as defined herein), by and through undersigned counsel, respectfully represents as follows in support of this motion (the “**Motion**”):

Relief Requested

1. The Reorganized Debtor seeks an extension of the Claim Objection Deadline (as defined below) by 150 days, from December 22, 2025 through and including May

¹ The last four digits of the Reorganized Debtor’s federal tax identification number are 2419. The Reorganized Debtor’s corporate headquarters and service address for the chapter 11 cases is 2451 Industry Avenue, Doraville, Georgia 30360. On September 7, 2023, the Bankruptcy Court entered the *Final Decree and Order Closing Certain Cases* (Case No. 23-90020, Docket No. 1262), closing the chapter 11 cases for Dreamwell, Ltd.’s Reorganized Debtor affiliates: Serta Simmons Bedding, LLC; Dawn Intermediate, LLC; National Bedding Company, L.L.C.; Serta International Holdco, LLC; Simmons Bedding Company, LLC; SSB Hospitality, LLC; SSB Logistics, LLC; SSB Manufacturing Company; SSB Retail, LLC; The Simmons Manufacturing Co., LLC; Tomorrow Sleep LLC; Tuft & Needle, LLC; and World of Sleep Outlets, LLC.

21, 2026, pursuant to section 105(a) of chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 9013-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Local Rules**”), Section K of the Procedures for Complex Cases in the Southern District of Texas, effective September 18, 2024 (the “**Complex Case Procedures**”), and Section 7.1 of the Plan (as defined below), without prejudice to the Reorganized Debtor’s ability to seek a further extension.

2. In support of the Motion the Reorganized Debtor respectfully submits the *Declaration of Armen Emrikian in Support of Reorganized Debtor’s Motion for an Order Further Extending Deadline to Object to Claims*, attached hereto as **Exhibit A** (the “**Emrikian Declaration**”).

3. A proposed form of order granting the relief requested herein is attached hereto as **Exhibit B** (the “**Proposed Order**”).

Jurisdiction

4. The United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and Article XI of the *Second Amended Joint Chapter 11 Plan of Serta Simmons Bedding, LLC and Its Affiliated Debtors* (Case No. 23-90020, Docket No. 977) (as supplemented or otherwise amended, the “**Plan**”).² This is a core proceeding pursuant to 28 U.S.C. § 157. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

² Capitalized terms used but not otherwise defined in this Motion have the meanings ascribed to them in the Plan.

Background

5. On January 23, 2023 (the “**Petition Date**”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. From and after the Petition Date, the Debtors operated their businesses and managed their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On June 14, 2023, the Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming Second Amended Joint Chapter 11 Plan of Serta Simmons Bedding, LLC and Its Affiliated Debtors* (Case No. 23-90020, Docket No. 1071) (the “**Confirmation Order**”). The Plan became effective on June 29, 2023 (the “**Effective Date**”) and, on the same day, the Debtors filed the *Notice of Effective Date of Second Amended Joint Chapter 11 Plan of Serta Simmons Bedding, LLC and Its Affiliated Debtors* (Case No. 23-90020, Docket No. 1150).

7. Article VII of the Plan provides that, after the Effective Date, the Reorganized Debtors and the Serta Simmons Class 6B Trust (the “**Class 6B Trust**”), as applicable, have the authority to: (a) file, withdraw, or litigate to judgment objections to Claims; (b) settle or compromise any Disputed Claim without any further notice to or action, order, or approval by the Bankruptcy Court; and (c) administer and adjust the claims register to reflect any such settlements or compromises without any further notice to or action, order, or approval by the Bankruptcy Court. *See* Plan at § 7.2.

8. On September 7, 2023, the Court entered the *Final Decree and Order Closing Certain Cases* (Case No. 23-90020, Docket No. 1262) (the “**Final Decree**”), closing each of the Debtors’ chapter 11 cases except the Reorganized Debtor’s case. Pursuant to the Final Decree and Confirmation Order, all objections to claims shall be filed, administered, and heard in the chapter 11 case of the Reorganized Debtor. *See* Final Decree at ¶ 3; *see also* Confirmation Order at ¶ 58.

A. Claims Process

9. On January 24, 2023, the Court entered the *Order (I) Establishing Deadlines and Procedures for Filing Proofs of Claim, (II) Approving Form and Manner of Notice Thereof, and (III) Granting Related Relief* (Case No. 23-90020, Docket No. 104) (the “**Bar Date Order**”). Among other things, the Bar Date Order established (i) March 16, 2023 at 5:00 p.m. (Central Time) as the deadline for general unsecured creditors to file Proofs of Claim against any of the Debtors, including a claim pursuant to section 503(b)(9) of the Bankruptcy Code (the “**General Bar Date**”) and (ii) July 22, 2023 at 5:00 p.m. (Central Time) as the deadline for Governmental Units (as defined by section 101(27) of the Bankruptcy Code) (the “**Government Bar Date**”) to file Proofs of Claim against any of the Debtors. The Bar Date Order also set the deadline to file a Proof of Claim relating to the Debtors’ rejection of an executory contract or unexpired lease as the later of (a) the General Bar Date or Government Bar Date, as applicable, and (b) thirty (30) days after entry of any order authorizing the rejection of such executory contract or unexpired lease, including entry of the Confirmation Order.

10. On March 9–10, 2023, the Debtors filed their schedules of assets and liabilities, and statements of financial affairs (Case No. 23-90020, Docket Nos. 443–470).

11. The deadline for objecting to filed Proofs of Claim or scheduled claims pursuant to the Plan, unless otherwise extended, was (a) the one hundred eightieth (180th) day following the later of (i) the Effective Date and (ii) the date that a Proof of Claim is filed or amended or a Claim is otherwise asserted or amended in writing by or on behalf of a holder of such Claim; or (b) such later date as may be fixed by the Bankruptcy Court (the “**Claim Objection Deadline**”). *See* Plan at § 1.17.

12. On December 8, 2023, the Court entered the *Order (A) Approving Omnibus Claims Objection Procedures; (B) Waiving the Requirement of Bankruptcy Rule 3007(e)(6); and (C) Granting Related Relief* (Case No. 23-90024, Docket No. 60), establishing procedures for the Reorganized Debtor and Class 6B Trust (collectively, the “**Estate Representatives**”) to object to claims on an omnibus basis on the grounds set forth in Bankruptcy Rule 3007(d) and on certain additional approved grounds.

13. The Court has entered several orders extending the Estate Representatives’ joint requests to extend the Claim Objection Deadline from time to time (Case No. 23-90024, Docket Nos. 76, 180, 272), including pursuant to the *Order Further Extending Deadline to Object to Claims*, granting the Estate Representatives’ request to further extend the Claim Objection Deadline through and including December 22, 2025 (Case No. 23-90024, Docket No. 357) (the “**Extension Order**”).

14. On July 7, 2025, the Court entered the *Order (I) Approving Revised Class 6B Cash Contribution Allocation; (II) Approving Distributions to Holders of Allowed Other General Unsecured Claims; (III) Approving Abandonment of Remaining Class 6B Trust Assets; and (IV) Discharging the Class 6B Trust and Related Parties* (Case No. 23-90024, Docket No. 348), pursuant to which the Bankruptcy Court set the Class 6B Cash Contribution Allocation on a final basis among the Debtors in accordance with the final Allowed Claim amounts at each Debtor, the Class 6B Trust paid final distributions to the holders of Allowed Other General Unsecured Claims in accordance with the Plan, and the Class 6B Trust was otherwise closed and the Class 6B Trustee was discharged from further obligations relating thereto.

15. Approximately 920 Proofs of Claim have been filed in the chapter 11 cases by claimants (the “**Claimants**”), in addition to approximately 2,600 scheduled claims, all totaling

more than \$15 billion in asserted or scheduled claims. The Reorganized Debtor has continued to make significant progress in reviewing, reconciling, and objecting to these claims, and as of the date hereof, only 6 proofs of claim remain outstanding.

16. Since the Effective Date, the Reorganized Debtors have spent considerable time and effort on the post-Effective Date matters required to wind up the Debtors' chapter 11 cases, which has included: (i) obtaining Court approval of omnibus claims objection procedures (Case No. 23-90024, Docket No. 60); (ii) objecting to 712 Proofs of Claim and 32 proofs of Interest, and consensually resolving more than 220 Claims through voluntary withdrawals, all totaling approximately \$15 billion (Case No. 23-90020, Docket Nos. 1207–10; Case No. 23-90024, Docket Nos. 11–14, 31, 69, 113, 249, 296, 310); (iii) cooperating in the administration of the Class 6B Trust and working with the Class 6B Trust to identify which claims should be classified as Class 6A Ongoing General Unsecured Claims and which are Class 6B Other General Unsecured Claims; (iv) entering into Class 6A Trade Agreements with certain vendors;³ (v) reviewing, analyzing, and determining appropriate responses to filed Proofs of Claim; (vi) negotiating with holders of Insured Litigation Claims and insurers; (vii) settling certain Claims; and (viii) responding to appeals before the Fifth Circuit.

17. Specifically, since filing the motion seeking entry of the Extension Order on June 22, 2025, the Reorganized Debtors have resolved 104 of the 110 claims that were then outstanding. Notably, these efforts included, among other things (i) successfully prosecuting a motion for summary judgment to declare the claims asserted by the Non-PTL Lenders and LCM Lenders against the Debtors discharged and released pursuant to, and in exchange for, the treatment

³ Pursuant to the Plan and Confirmation Order, any holder of an Ongoing General Unsecured Claim that fails to execute a 6A Trade Agreement will receive the treatment provided under Class 6B.

and distributions afforded under the Plan and Confirmation Order, pursuant to which 28 proofs of claim by the PTL and Non-PTL Lenders were resolved; (ii) successfully opposing the petition for certiorari filed by the PTL Lenders in the Supreme Court of the United States, which was denied on November 10, 2025; and (iii) negotiating a consensual withdrawal or resolution of approximately 75 other prepetition Claims.

18. As of the date hereof, the Reorganized Debtors estimate only six (6) claims remain unresolved. The Debtors are continuing to make progress to resolve these claims and engage with the counterparties, and anticipate being able to resolve a number of the remaining claims in the coming months.

Basis for Relief

19. The Plan, Bankruptcy Code, and Bankruptcy Rules provide ample authority on which the Court may grant the requested relief. Additionally, the facts and circumstances of these chapter 11 cases demonstrate that cause exists to extend the Claim Objection Deadline.

20. First, pursuant to the Plan, “[a]ny objections to Claim shall be served and filed on or before the later of: (a) the Claim Objection Deadline; and (b) such later date as may be fixed by the Bankruptcy Court.” Plan § 7.1; *see also* Plan § 1.17 (definition of Claim Objection Deadline).

21. Second, 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 [the Bankruptcy Code].” 11 U.S.C. § 105(a); *see also In re Sanchez*, 372 B.R. 289, 309–10 (Bankr. S.D. Tex. 2007) (describing the scope of a bankruptcy court’s authority under section 105(a)); *In re CEI Roofing, Inc.*, 315 B.R. 50, 55–56 (Bankr. N.D. Tex. 2004); *In re Cooper Props. Liquidating Tr., Inc.*, 61 B.R. 531, 537 (Bankr. W.D. Tenn. 1986) (noting that the bankruptcy court is “one of equity and as such it has a duty to protect whatever equities a debtor

may have in property for the benefit of its creditors as long as that protection is implemented in a manner consistent with the bankruptcy laws.”).

22. Furthermore, Bankruptcy Rule 9006(b)(1) provides, in pertinent part, that:

when an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, 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

Fed. R. Bankr. P. 9006(b)(1).

23. Extensions of time to object to claims have been granted in other chapter 11 cases in this District where there are a substantial number of claims and complex issues. *See, e.g., In re PetroQuest Energy, Inc.*, Case No. 18-36322 (CML) (Bankr. S.D. Tex. Jan. 1, 2024) (Docket No. 931) (granting an eleventh extension of the deadline to object to claims by 281 days); *In re NPC International, Inc.*, Case No. 20-33353 (DRJ) (Bankr. S.D. Tex. September 22, 2025) (Docket No. 2436) (granting ninth extension of the deadline to object to claims by an additional 180 days); *In re SpeedCast Int’l Ltd.*, Case No. 20-32243 (MI) (Bankr. S.D. Tex. Jan. 26, 2023) (Docket No. 2037) (granting a fifth extension of the deadline to object to claims by an additional 181 days); *In re Talen Energy Corporation*, Case No. 22-90339 (MI) (Bankr. S.D. Tex. Aug. 26, 2025)(docket No. 632) (granting fourth extension of the deadline to object to claims by an additional 182 days). Similar relief is appropriate under the facts and circumstances in this case.

24. The Reorganized Debtor submits that cause exists to extend the current Claim Objection Deadline for 150 days through and including May 21, 2026. The Reorganized Debtor and its advisors have made substantial progress, the Reorganized Debtor continues to actively review and assess limited number of Claims that have been filed against the Debtors that

have not yet been resolved and require additional time to finalize their review or negotiation with Claimants, and to prepare and file objections to Claims, as necessary.

25. The Reorganized Debtor further submits that the requested relief is not sought for purposes of delay and will not prejudice any Claimants or other parties in interest. Absent the requested relief, the Reorganized Debtors will not be able to fully address all Claims they are currently responsible for administering prior to the expiration of the Claim Objection Deadline. The relief requested herein is in the best interests of the Reorganized Debtors and the Debtors' creditors, and is necessary and appropriate to ensure that the Claims reconciliation process, including the prosecution of any objections to the Claims, is accurate, comprehensive, and completed in a timely and efficient manner.

26. Accordingly, the Reorganized Debtors respectfully request that the Court enter an order further extending the Claim Objection Deadline for 150 days, from December 22, 2025 through and including May 21, 2026, without prejudice to the Reorganized Debtor's ability to seek further extensions.

Notice

Notice of this Motion will be served on any party entitled to notice pursuant to Bankruptcy Rule 2002 and any other party entitled to notice pursuant to Bankruptcy Local Rule 9013-1(d).

WHEREFORE the Reorganized Debtor respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: December 19, 2025
Houston, Texas

/s/ Stephanie N. Morrison

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Counsel for Reorganized Debtor

Certificate of Service

I hereby certify that, on December 19, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Stephanie N. Morrison
Stephanie N. Morrison

Exhibit A

Emrikian Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
DREAMWELL, LTD.,	§	Case No. 23-90024 (CML)
	§	
Reorganized Debtor.¹	§	

**DECLARATION OF ARMEN EMRIKIAN
IN SUPPORT OF REORGANIZED DEBTOR’S MOTION
FOR AN ORDER FURTHER EXTENDING DEADLINE TO OBJECT TO CLAIMS**

I, Armen Emrikian, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a Senior Managing Director with FTI Consulting, Inc. (“**FTI**”). On March 6, 2023, the Bankruptcy Court entered an order approving the retention of FTI as the financial advisor to Serta Simmons Bedding, LLC (the “**Company**”), and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) (Case No. 23-90020, Docket No. 421). On September 7, 2023, the Court entered the *Final Decree and Order Closing Certain Cases* (Case No. 23-90020, Docket No. 1262), closing each of the Debtors’ chapter 11 cases except the case of Dreamwell, Ltd. (the “**Reorganized Debtor**”). I am knowledgeable about and familiar with the Reorganized Debtor’s businesses and financial affairs.

¹ The last four digits of the Reorganized Debtor’s federal tax identification number are 2419. The Reorganized Debtor’s corporate headquarters and service address for the chapter 11 cases is 2451 Industry Avenue, Doraville, Georgia 30360. On September 7, 2023, the Bankruptcy Court entered the *Final Decree and Order Closing Certain Cases* (Case No. 23-90020, Docket No. 1262), closing the chapter 11 cases for Dreamwell, Ltd.’s Reorganized Debtor affiliates: Serta Simmons Bedding, LLC; Dawn Intermediate, LLC; National Bedding Company, L.L.C.; Serta International Holdco, LLC; Simmons Bedding Company, LLC; SSB Hospitality, LLC; SSB Logistics, LLC; SSB Manufacturing Company; SSB Retail, LLC; The Simmons Manufacturing Co., LLC; Tomorrow Sleep LLC; Tuft & Needle, LLC; and World of Sleep Outlets, LLC.

2. I am authorized to submit this declaration on behalf of the Reorganized Debtor in support of *Reorganized Debtor's Motion for an Order Further Extending Deadline to Object to Claims* (the "**Motion**"),² filed contemporaneously herewith. If I were called upon to testify, I could and would competently testify to the facts set forth herein.

3. Approximately 920 Proofs of Claim have been filed in the chapter 11 cases by claimants (the "**Claimants**"), in addition to approximately 2,600 scheduled claims, all totaling more than \$15 billion in asserted or scheduled claims. The Reorganized Debtor has, to date, made significant progress in reviewing, reconciling, and objecting to these claims.

4. Since entry of the Extension Order, the Reorganized Debtors have resolved 104 claims asserting an aggregate asserted amount of approximately \$2.44 million.

5. Although the Reorganized Debtor and its professionals have made substantial progress addressing Proofs of Claim and other post-Effective Date matters, additional review, reconciliation and negotiation of the estimated six (6) remaining Claims remains to be completed.

6. I believe that the requested extension of the Claim Objection Deadline is reasonable and is not sought for the purposes of delay. I do not believe that the relief requested in the Motion will prejudice any Claimants or other parties in interest.

7. In light of the foregoing, I believe that extending the Claim Objection Deadline is necessary and appropriate to ensure that the Reorganized Debtor's Claims administration process, including the prosecution of any objections to Claims, is accurate, comprehensive, and completed in a timely and efficient manner. I believe that the requested extension is in the best interests of the Reorganized Debtor and the Debtors' creditors. Providing

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

the Reorganized Debtor with the time necessary to thoroughly complete its analysis assessment of the remaining Claims will prevent creditors from potentially receiving an unwarranted recovery to the detriment of other creditors.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set forth in the foregoing declaration are true and correct.

Dated: December 19, 2025

/s/ Armen Emrikian

Armen Emrikian
Senior Managing Director
FTI Consulting, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: DREAMWELL, LTD., Reorganized Debtor.¹	§ § § § § §	Chapter 11 Case No. 23-90024 (CML) Re: Docket No. ____
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ORDER FURTHER EXTENDING DEADLINE TO OBJECT TO CLAIMS

Upon the motion (the “**Motion**”)² of the Reorganized Debtor seeking entry of an order (this “**Order**”) pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006(b), Bankruptcy Local Rule 9013-1, Section K of the Complex Case Procedures, and Section 7.1 of the Plan, extending the current Claim Objection Deadline, all as more fully set forth in the Motion and the Emrikian; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334 and Section 11.1 of the Plan; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and this Court having determined that the

¹ The last four digits of the Reorganized Debtor’s federal tax identification number are 2419. The Reorganized Debtor’s corporate headquarters and service address for the chapter 11 cases is 2451 Industry Avenue, Doraville, Georgia 30360. On September 7, 2023, the Bankruptcy Court entered the *Final Decree and Order Closing Certain Cases* (Case No. 23-90020, Docket No. 1262), closing the chapter 11 cases for Dreamwell, Ltd.’s Reorganized Debtor affiliates: Serta Simmons Bedding, LLC; Dawn Intermediate, LLC; National Bedding Company, L.L.C.; Serta International Holdco, LLC; Simmons Bedding Company, LLC; SSB Hospitality, LLC; SSB Logistics, LLC; SSB Manufacturing Company; SSB Retail, LLC; The Simmons Manufacturing Co., LLC; Tomorrow Sleep LLC; Tuft & Needle, LLC; and World of Sleep Outlets, LLC.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the estates and all parties in interest; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Claim Objection Deadline is hereby extended through and including May 21, 2026.

2. The entry of this Order shall be without prejudice to the ability of the Reorganized Debtor to seek a further extension of the Claim Objection Deadline upon a motion by the Reorganized Debtor filed on or before May 21, 2026, or to seek other appropriate relief.

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

Dated: _____
Houston, Texas

CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE