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BRETT S. MOORE
MEMBER, NJ AND NY BARS
DIRECT DIAL NO.: 646-348-6723
E-MAIL ADDRESS: BSMOORE@PBNLAW.COM

December 4, 2025

Honorable Martin Glenn
Chief Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, New York 10004

Re: *In re RM Bakery LLC, et al.*
Case No.: 20-11422 (MG)

Dear Judge Glenn:

This firm is counsel to BANC OF CALIFORNIA, as successor to Pacific Western Bank ("Pac West") in the above referenced matter. On October 22, 2024, Your Honor entered the Order Confirming Third Amended Joint Plan Of Reorganization (the "Plan") Of RM Bakery, LLC And BKD Group LLC (the "Confirmation Order"), ECF No. 470. As set forth in the Plan, the secured claim of Pac West was designated as Class 2, and the treatment of Pac West's secured claim is set forth in Section 4.2 of the Plan. The Debtors are required to make monthly payments to Pac West, but, have consistently fallen behind in their payment obligations owed to Pac West under the Plan. As of today, the Debtors are currently four (4) months behind in their payment obligations owed to Pac West. While we have been told that the Debtors are in the process of seeking "additional financing", the promised catch-up payments that were to be made last month remain outstanding.

Accordingly, Pac West respectfully requests that the Court schedule a status conference at the Court's convenience to discuss the Debtors' lack of compliance with its obligations under the Plan, and to discuss a possible motion to enforce same. Debtors' counsel has requested that any conference be scheduled in the second half of December if that meets with the Court's schedule, and we have no objection to that request.

Respectfully submitted,

/s/ Brett S. Moore
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