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Counsel to the Zips GUC Trust

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

In re:

ZIPS CAR WASH, LLC,¹

Reorganized Debtor.

Chapter 11

Case No. 25-80069 (MVL)

**THE GUC TRUST'S AMENDED FIFTH 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
(DEFICIENT CLAIM FORMS)**

THIS IS AN OBJECTION TO YOUR CLAIM. 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.TXNB.USCOURTS.GOV/](https://ecf.txnb.uscourts.gov/) NO MORE THAN THIRTY (30) DAYS AFTER THE DATE THIS OBJECTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN RESPONSE THAT IS ACTUALLY RECEIVED BY THE CLERK AND FILED ON THE DOCKET NO MORE THAN THIRTY (30) DAYS AFTER THE DATE THIS OBJECTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE OBJECTION AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

¹ The last four digits of the Reorganized Debtor's federal tax identification number are 3045. A complete list of each of the former Debtors whose claims are being administered in this chapter 11 case may be obtained on the website of this Reorganized Debtor's claims and noticing agent at <https://cases.ra.kroll.com/Zipscarwash/HomeIndex>.

A HEARING WILL BE CONDUCTED ON THIS MATTER ON DECEMBER 3, 2025, AT 1:30 P.M. CENTRAL TIME IN ROOM 1424, EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE STREET, 14TH FLOOR, COURTROOM 2, DALLAS, TEXAS 75242. YOU MAY PARTICIPATE IN THE HEARING EITHER IN PERSON OR BY AN AUDIO AND VIDEO CONNECTION. AUDIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT 1.650.479.3207. THE MEETING CODE IS 2301 476 1957. VIDEO COMMUNICATION WILL BE BY USE OF THE CISCO WEBEX PLATFORM. CONNECT VIA THE CISCO WEBEX APPLICATION OR CLICK THE LINK ON JUDGE LARSON'S HOME PAGE. CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING. HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF ELECTRONIC HEARINGS. TO MAKE YOUR APPEARANCE, CLICK THE "ELECTRONIC APPEARANCE" LINK ON JUDGE LARSON'S HOME PAGE. SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK "SUBMIT" TO COMPLETE YOUR APPEARANCE.

The Zips General Unsecured Claims Trust (the "GUC Trust"),² by and through Olympus Guardians LLC as trustee (the "Trustee") of the GUC Trust, files the *GUC Trust's Amended Fifth 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 (Deficient Claim Forms)* (the "Objection"). In support of this Objection, the GUC Trust respectfully represents as follows:

Jurisdiction and Venue

1. 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. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

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

2. The statutory bases for the relief requested in this Objection are sections 105(a) and 502 of Title 11 of the United States Code (the “Bankruptcy Code”); Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); Rule 3007-1 of the Bankruptcy Local Rules for the Northern District of Texas (the “Local Rules”); and Paragraphs 44-47 of the *Procedures for Complex Cases in the Northern District of Texas*, effective February 6, 2023 (the “Complex Case Procedures”).

Relief Requested

3. The GUC Trust respectfully requests entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), disallowing each claim identified as set forth on Schedule 1 to the Proposed Order (collectively, the “Deficient Claims”) because each Deficient Claim fails to set forth an amount owing to the claimant by the Debtors and/or fails to set forth any further detail or documentation that would enable the GUC Trust to determine the amount and validity of the Deficient Claims.

General Background

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

5. On March 13, 2025, the Bankruptcy Court entered the *Order (I) Setting Bar Dates for Filing Proofs of Claim; (II) Approving Form and Manner for Filing Proofs of Claim; and (III) Approving the Form and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests Notice of Bar Dates* [Docket No. 216] (the “Bar Date Order”) which set forth the bar dates for filing the proofs of claim as well as the appropriate form and manner for doing so. Under the Bar Date Order, the general non-governmental claims bar date is April 10, 2025 at 4:00 p.m.

(prevailing Central Time) and the governmental bar date was August 4, 2025 at 4:00 p.m. (prevailing Central Time). *See* Docket No. 216; ¶¶ 1, 5.

6. On April 18, 2025, the Bankruptcy Court 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") confirming the Plan. On April 30, 2025 (the "Plan Effective Date"), the Plan became effective pursuant to its terms. *See* Docket No. 417.

7. In accordance with the Plan, upon the occurrence of the Plan Effective Date, the GUC Trust was formed and is authorized, among other things, to reconcile and, if necessary, object to all General Unsecured Claims. The Plan incorporates the GUC Trust Agreement, which names Olympus Guardians LLC as the Trustee of the GUC Trust. *See* Docket No. 365.

8. The Plan provides that the GUC Trust has the exclusive right to (1) file, withdraw, or litigate to judgment, objections to Claims or Interests; (2) settle or compromise any Disputed Claim without any further notice to or action, order, or approval by the Court; (3) 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 Court; and (4) assert any and all rights and defenses such Debtor had with respect to any General Unsecured Claim immediately prior to the effective date. *See* Docket No. 365.

The Claims Reconciliation Process

9. Attached hereto as **Exhibit B** is the *Declaration of Amanda Demby Swift in Support of the GUC Trust's Amended Fifth 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 (Deficient Claim Forms) (the “Swift Declaration”).

10. As set forth in the Swift Declaration, the GUC Trust and its advisors have been working diligently to review proofs of claim and scheduled claims, including any supporting documentation filed together with any proof of claim. While the GUC Trust’s professionals continue to review and reconcile claims, the GUC Trust has identified several claims that are deficient on their face as set forth on Schedule 1 to the Proposed Order for the reasons set forth more specifically thereon.

11. The Deficient Claims fail to set forth an amount certain or any additional information that would enable the GUC Trust to determine the amount of the Deficient Claims. Despite requests for further information by the GUC Trust, no information has been received from the claimants as of the date of the filing of this Objection. As a result of the deficiencies in the manner in which the Deficient Claims were presented, the GUC Trust is unable to determine the validity of the Deficient Claims.

Basis for Relief

12. A filed proof of claim is deemed allowed, unless a party in interest objects. 11 U.S.C. § 502(a). A properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. Fed. R. Bankr. P. 3001(f). Section 502(b)(1) – (9) of the Bankruptcy Code lists nine separate grounds for disallowing a claim, including that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured.” 11 U.S.C. § 502(b)(1).

13. However, to receive the benefit of *prima facie* validity, a proof of claim must assert factual allegations that would entitle the claimant to a recovery. *Wilferth v. Heritage Org., L.L.C.* (*In re Heritage Org., L.L.C.*), No. 04-35574-BJH-11, 2006 Bankr. LEXIS 4577, at *22 (Bankr. N.D. Tex. Jan. 27, 2006). Additionally, a claimant's proof of claim is entitled to the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) only until an objecting party refutes at least one of the allegations that are essential to the claim's legal sufficiency. *In re Starnes*, 231 B.R. 903, 912 (N.D. Tex. 1998). Once an allegation is refuted, "the burden shifts to the claimant to prove by a preponderance of the evidence." *In re Congress, LLC*, 529 B.R. 213, 219 (Bankr. W.D. Tex. 2015); *see also Cavu/Rock Props. Project I, LLC v. Gold Star Constr., Inc. (In re Cavu/Rock Props. Project I, LLC)*, 516 B.R. 414, 422 (Bankr. W.D. Tex. 2014). "The ultimate burden of proof always lies with the claimant." *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006).

14. An objection to a proof of claim must be made in writing, and the claimant must be provided with not less than thirty days' notice of the hearing to be held in respect of such objection. *See* Fed. R. Bankr. P. 3007(a). Objections may be joined in an omnibus objection if such objections are based on the grounds that the claims should be disallowed, in whole or in part, for any of eight enumerated reasons, including that they were presented in a format that does not comply with applicable rules. *See* Fed. R. Bankr. P. 3007(d)(2)(F).

15. The Bankruptcy Rules provide that claims must substantially conform to Form 410, which require that a claimant include the amount of the claim and the basis for the claim. *See* Fed. R. Bankr. P. 3001(a). In addition, if the claim based on a writing, the claim must attach a copy of such writing as required supporting information. *See* Fed. R. Bankr. P. 3001(c)(1).

16. Each of the Deficient Claims listed on Schedule 1 to the Proposed Order is deficient for the reasons set forth more specifically in Schedule 1 because they each fail to set forth an

amount certain, fail to provide a clear basis for the claim, and fail to attach supporting documentation. The GUC Trust is unable to ascertain the amount, let alone the validity, of the Deficient Claims. *See* Swift Decl. ¶ 5. Consequently, the GUC Trust objects to the Deficient Claims and believes that such claims should be disallowed.

17. If the Deficient Claims are not disallowed, the claims of other stakeholders in these cases will be negatively impacted in the calculation of the recovery available to general unsecured creditors under the Plan. *See* Swift Decl. ¶ 6.

18. Accordingly, the GUC Trust respectfully requests that the Court disallow each claim identified on Schedule 1 to the Proposed Order for the reasons set forth herein and in the “Basis for Objection” column.

Reservation of Rights

19. In the event that any of the Deficient Claims are not disposed of in the manner and on the grounds asserted herein, the GUC Trust hereby reserves all rights to object to such Deficient Claims on any other grounds. In particular, the majority of the Deficient Claims appear to be filed late after the Bar Date. Additionally, the GUC Trust expressly reserves the right to amend, modify, or supplement the objections asserted herein and to file additional objections to the Deficient Claims or any other unsecured claims that may be asserted against the Debtors’ estates by these claimants.

Separate Contested Matter

20. To the extent that a response is filed regarding any Deficient Claims and the GUC Trust is unable to resolve any such response, each such Deficient Claim, and the Objection as it pertains to each Deficient Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Further, the GUC Trust requests that any order entered by the Court

regarding an objection or other reply asserted in response to this Objection be deemed a separate order with respect to each proof of claim.

Notice

21. Notice of this Objection has been given to: (a) holders of the Deficient Claims and, if known, their counsel; (b) the U.S. Trustee; (c) the Debtors through their counsel of record; and (d) any party requesting notice after the Plan Effective Date under Rule 2002 of the Bankruptcy Rules. The GUC Trust respectfully submits that such notice is sufficient and proper under the circumstances and that no other or further notice is required.

Compliance with Local Rules

22. This Objection includes citations to the applicable rules and statutory authorities upon which the relief requested is predicated and a discussion of their application to this Objection. The GUC Trust objects to no more than 100 proofs of claim herein, lists each claimant alphabetically, and identifies the proof of claim number, the date the claim was filed and the dollar amount at issue. The GUC Trust has served notice of this Objection on those persons whose names appear in the signature blocks on the proofs of claim and in accordance with Bankruptcy Rule 7004, as well as any counsel identified in such proofs of claim. Each claimant identified on **Exhibit A** may request a copy of their proof of claim from the GUC Trust upon request to counsel for the GUC Trust identified below. Accordingly, the GUC Trust submits that this Objection satisfies Local Rule 3007-2.

[Remainder of Page Intentionally Left Blank]

Conclusion

WHEREFORE, based upon the foregoing, the GUC Trust respectfully requests that the Court: (a) sustain this Objection; (b) enter the Proposed Order sustaining this Objection providing that the Deficient Claims shall be disallowed as identified on Schedule 1 to the Proposed Order; and (c) grant such other and further relief as the Court deems just and proper under the circumstances.

Dated: October 23, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Maxim B. Litvak

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Counsel to the Zips GUC Trust

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2025, a true and correct copy of the above and foregoing was caused to be served through this Court's CM/ECF noticing system to all parties registered to receive notices in these cases and by first class U.S. Mail on those persons whose names appear in the signature blocks on the Deficient Claims and in accordance with Bankruptcy Rule 7004, as well as any counsel identified in such proofs of claim.

/s/ Maxim B. Litvak

Maxim B. Litvak

EXHIBIT A

(Proposed Order)

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

In re:

ZIPS CAR WASH, LLC,¹

Reorganized Debtor.

Chapter 11

Case No. 25-80069 (MVL)

**ORDER SUSTAINING THE GUC TRUST'S AMENDED FIFTH 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 (DEFICIENT CLAIM FORMS)**

[Relates to Docket No. ____]

Upon the *GUC Trust's Amended Fifth 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 (Deficient Claim Forms)* (the "Objection")² filed by the Zips

¹ The last four digits of the Reorganized Debtor's federal tax identification number are 3045. A complete list of each of the former Debtors whose claims are being administered in this chapter 11 case may be obtained on the website of this Reorganized Debtor's claims and noticing agent at <https://cases.ra.kroll.com/Zipscarwash/HomeIndex>.

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

General Unsecured Claims Trust (the “GUC Trust”), formed pursuant to the confirmed Plan of the above-captioned debtors (collectively, the “Debtors”), seeking entry of an order (this “Order”) disallowing each claim identified on Schedule 1 attached hereto (collectively, the “Deficient Claims”) for the reasons set forth in the Objection and the upon the Swift Declaration; pursuant to sections 105(a), 502, 503, and 507 of Title 11 of the United States Code (the “Bankruptcy Code”); Rules 3001 and 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 3007-1 and 3007-2 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Northern District of Texas; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and consideration of the Objection and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and this Court having reviewed the Objection and any responses filed thereto; and this Court having found and determined that the relief sought in the Objection is supported by applicable law and is in the best interests of the GUC Trust, the beneficiaries of the GUC Trust, and all parties in interest, and that the legal and factual bases set forth in the Objection and Swift Declaration establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007, each of the Deficient Claims identified on Schedule 1 to this Order is disallowed in its entirety as set forth in the “Basis for Objection” column of Schedule 1.

2. Each Deficient Claim, and the Objection thereto, constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Deficient Claim.

3. The GUC Trust is authorized to take all steps necessary or appropriate to effectuate the relief granted pursuant to this Order in accordance with the Objection.

4. This Court retains exclusive jurisdiction and power to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order

###END OF ORDER###

ORDER SUBMITTED BY:

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Counsel to the Zips GUC Trust

Schedule 1

(Deficient Claims)

Claimant Name	Claim No.	Date Filed	Basis for Objection
Daughtry, Nyla c/o Colin Richards Law Colin Richards, Esq. 900 Oscoela Drive, Ste 201 West Palm Beach, FL 33409	391	05/19/25	The amount of the claim is stated as "Approx \$10,000, which will be amended upon receipt of all medical bills." The basis of the claim is stated as "Personal Injury." No documentation is attached.
Fair, Jarquez Da'sean Address Redacted	438	07/18/25	The amount of the claim is stated at "?" The basis of the claim is stated as "Zips Bankruptcy claim." No documentation is attached. That Debtors have confirmed that the claimant was a prior employee, but they have no record of any outstanding amounts being owed to him.
Flack, Kase Miguel Address Redacted	420	06/09/25	No amount is stated as being owed. The basis of the claim is stated as "Services performed." No documentation is attached.
Gilbert, Matrecia c/o Colin Richards Law Colin Richards, Esq. 900 Oscoela Drive, Ste 201 West Palm Beach, FL 33409	390	05/19/25	The amount of the claim is stated as "Approx \$10,000.00, which will be amended upon receipt (sic) of all medical bills." The basis of the claim is stated as "Personal Injury." No documentation is attached.
Lynch, Jake Ryan Address Redacted	195	03/31/25	No amount is stated as being owed. No basis of the claim is set forth. No documentation is attached.
Wallace, Rashad c/o Colin Richards Law Colin Richards, Esq. 900 Oscoela Drive, Ste 201 West Palm Beach, FL 33409	392	05/19/25	The amount of the claim is stated as "Approximately \$10,000.00. We will update upon receipt of medical bills." The basis of the claim is stated as "Personal Injury." No documentation is attached.

Exhibit B

(Swift Declaration)

Maxim B. Litvak, Esq. (TX Bar No. 24002482)
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

ZIPS CAR WASH, LLC,¹

Reorganized Debtor.

Chapter 11

Case No. 25-80069 (MVL)

**DECLARATION OF AMANDA DEMBY SWIFT IN SUPPORT OF THE GUC TRUST'S
AMENDED FIFTH 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
(DEFICIENT CLAIM FORMS)**

Pursuant to 28 U.S.C. §1746, I, Amanda Demby Swift, solely in my capacity as a partner with Province, LLP, financial advisor for the Zips General Unsecured Claims Trust (the "GUC Trust"), formed pursuant to the confirmed Plan of the above-captioned debtors (collectively, the "Debtors"), hereby declare as follows:

1. I am a Partner at Province, LLP ("Province"). Inclusive of my time at Province, I have approximately 15 years of experience in corporate restructuring, including advising creditors

¹ The last four digits of the Reorganized Debtor's federal tax identification number are 3045. A complete list of each of the former Debtors whose claims are being administered in this chapter 11 case may be obtained on the website of this Reorganized Debtor's claims and noticing agent at <https://cases.ra.kroll.com/Zipscarwash/HomeIndex>.

and debtors on strategic planning, financial projections, claim reconciliation, claim resolution, and debt restructuring. In connection with chapter 11 restructurings, I possess considerable familiarity with and experience in, among other things, analyzing and monitoring cash management systems, debt classification and priority, preference actions, fraudulent conveyance actions, feasibility issues, disclosure statement and plan of reorganization approval procedures and hearings, negotiations between debtors and their creditors, and the resolution of claims asserted against debtors.

2. Contemporaneously with the filing of this Declaration, the GUC Trust filed the *GUC Trust's Amended Fifth 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 (Deficient Claim Forms)* (the "Objection").²

3. The facts set forth in this Declaration are based upon my personal knowledge or upon my review of the Debtors' books and records or, as appropriate, the review of the Debtors' books and records by others on the GUC Trust team under my supervision and direction. The Debtors' pre and post-petition books and records were made and kept in the regular course of the Debtors' business operations, at or near the time of the information recorded by persons with knowledge of those matters and a duty to record such information accurately and completely, and it was the regular practice of the Debtors to record the information set forth in the books and records in the ordinary course of their business operations. Further, I or others under my supervision and direction have reviewed and analyzed, to the extent possible, the scheduled claims and proofs of claim listed in Schedule 1 to the Proposed Order (collectively, the "Deficient Claims"), including any documentation attached to such proofs of claim, and applicable pleadings

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

filed with the Bankruptcy Court. If called and sworn as a witness, I could and would testify competently to the matters set forth herein.

4. The GUC Trust is in the process of reviewing all claims filed against each of the Debtors in these chapter 11 cases that fall within the purview of the GUC Trust pursuant to the Plan as confirmed. As part of this review, I and my team have reviewed the Deficient Claims on Schedule 1 to the Proposed Order and determined that the Deficient Claims are deficient for the reasons set forth more specifically on Schedule 1.

5. The Deficient Claims fail to set forth an amount certain or provide any documentation as to the amounts requested. The GUC Trust has reached out to the claimants for further information that would support the Deficient Claims, but no such information has been received as of this date. After review and analysis, the GUC Trust has determined that the Deficient Claims fail to include sufficient information that would enable the GUC Trust to determine the validity of each such claim. Therefore, the Deficient Claims should be disallowed.

6. Accordingly, the GUC Trust believes that if the Deficient Claims are not disposed of as indicated, the claims of other stakeholders in these cases will be negatively impacted in the calculation of the recovery available to general unsecured creditors under the Plan.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 23, 2025

/s/ Amanda Demby Swift
Amanda Demby Swift