

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

MY JOB MATCHER, INC., et al.,
Debtors.

Case No. 25-11280 (KBO)
(Chapter 11)

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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

OBJECTION OF CREDITOR LAUREN BRODOCK TO CONFIRMATION OF THE DEBTORS'
PLAN OF LIQUIDATION

Lauren Brodock (the "Objecting Creditor"), a creditor in the above-captioned Chapter 11 cases, appearing pro se, hereby objects (the "Objection") to confirmation of the Debtors' Plan of Liquidation (the "Plan"). In support of this Objection, the Objecting Creditor respectfully states as follows:

I. PRELIMINARY STATEMENT

This Objection is submitted in good faith and is not intended to delay these cases or obstruct confirmation. Rather, it is narrowly focused on issues of notice, fairness, and the treatment of employee creditors under the Plan as currently structured.

While the Objecting Creditor appreciates the Debtors' efforts to move these cases toward resolution, the Plan places disproportionate risk and uncertainty on employee creditors without providing meaningful protections, payment certainty, or adequate solicitation timing.

II. OBJECTION BASED ON INSUFFICIENT NOTICE AND COMPRESSED SOLICITATION
PERIOD

The solicitation and voting period occurred largely during the holiday season, materially limiting creditors' ability to review the Plan, Disclosure Statement, and Plan Supplement in a meaningful way.

Although the Debtors complied with technical notice requirements, due process requires a meaningful opportunity to be heard, not merely formal compliance.

Here:

Ballot materials were received during the holiday period;

Voting and objection deadlines closely followed; and

The Plan Supplement, including the Liquidating Trust Agreement, was filed on January 7, 2026—only days before the objection deadline.

This compressed timeline, combined with the volume and complexity of materials, impaired creditors' ability to make informed decisions and weighs against confirmation without further consideration.

III. OBJECTION TO THE PLAN'S TREATMENT OF EMPLOYEE CREDITORS

The Plan unfairly disadvantages employee creditors, including those holding Priority Non-Tax Claims, in several material respects.

First, employee creditors are divided between Class 1 (Priority Non-Tax Claims) and Class 5 (General Unsecured Claims), despite being similarly situated with respect to the harm suffered. This structure results in materially different recoveries and risk exposure for employees without any employee-specific protections.

Second, although Class 1 claims are designated as "priority," the Plan provides no guaranteed payment amount, no minimum distribution, and no defined payment timeline. Employee recoveries are subordinated to administrative expenses, professional fees, secured claims, and liquidation costs, leaving employees to bear substantial uncertainty.

Third, the Liquidating Trust Agreement grants broad discretion to the Liquidating Trustee, permits the payment of professional fees ahead of creditor distributions, and allows for significant delays, all without safeguards tailored to employee creditors who relied on wages and benefits for basic living expenses.

IV. OVERBROAD RELEASES WITHOUT COMMENSURATE CONSIDERATION FOR EMPLOYEES

The Plan contains broad release and exculpation provisions benefiting the Debtors, professionals, and other parties, while employee creditors receive no meaningful

consideration or protection in exchange. This imbalance further supports the conclusion that the Plan is not fair and equitable as applied to employee creditors.

V. RELIEF REQUESTED

The Objecting Creditor does not seek to derail these cases. Instead, the Objecting Creditor respectfully requests that the Court:

Consider whether the solicitation process afforded employee creditors a meaningful opportunity to review and vote on the Plan;

Require clarification or modification of the Plan to address the disparate and uncertain treatment of employee creditors; and

Decline to confirm the Plan in its current form unless these issues are adequately addressed.

VI. CONCLUSION

For the foregoing reasons, the Objecting Creditor respectfully objects to confirmation of the Plan as presently structured and requests such further relief as the Court deems just and proper.

Dated: January 13, 2026

Respectfully submitted,

/s/ Lauren Brodock

Lauren Brodock

Creditor, Pro Se

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Certificate of Service

I certify that on January 13, 2026, I served a copy of this Objection by email upon counsel for the Debtors, the Claims Agent (Stretto), the Office of the United States Trustee, and other parties entitled to notice in these cases.

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New Hartford, NY 13413



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NEW HARTFORD, NY 13413
JAN 13, 2026

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