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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>RUNWAY LIQUIDATION</b>	:	<b>Case No. 17-10466 (SCC)</b>
<b>HOLDINGS, LLC, et al.,<sup>1</sup></b>	:	
	:	<b>Jointly Administered</b>
<b>Debtors.</b>	:	
-----X		

**CERTIFICATION OF COUNSEL REGARDING THE PLAN  
ADMINISTRATOR’S MOTION FOR ENTRY OF AN ORDER (I) EXTENDING  
THE PERIOD TO FILE OBJECTIONS TO CLAIMS AND (II) FURTHER  
EXTENDING THE PERIOD TO FILE OBJECTIONS TO ADMINISTRATIVE CLAIMS**

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), and in accordance with the case management procedures set forth in the *Order Establishing Certain Notice, Case Management, and Administrative Procedures* [Docket No. 90] (the “Case Management Order”), the undersigned hereby certifies as follows:

1. On December 14, 2017, counsel to David MacGreevey, in his capacity as the plan administrator (“Plan Administrator”) filed the *Plan Administrator’s Motion For Entry of an*

<sup>1</sup> A list of the Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number include: Runway Liquidation Holdings, LLC (6857); Runway Liquidation, LLC (5942); Runway Liquidation Intermediate Holdings, LLC (3673); MR Liquidation, LLC (9200); and MMH Liquidation, LLC (3854).

*Order (I) Extending the Period to File Objections to Claims and (II) Further Extending the Period to File Objections to Administrative Claims* [Docket No. 771] (the “Motion”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

2. Pursuant to the *Notice of and Plan Administrator’s Motion For Entry of an Order (I) Extending the Period to File Objections to Claims and (II) Further Extending the Period to File Objections to Administrative Claims* [Docket No. 771], responses to the Motion were to be filed and served no later than January 16, 2018, at 4:00 p.m. (the “Objection Deadline”).

3. The Case Management Procedures provide that where no objection to a request for relief is filed, the movant may submit a proposed order granting such request for relief to the Court along with a certificate of no objection stating that no objection has been filed or served on the movant.

4. The undersigned counsel hereby certifies that, as of the date hereof, no answer, objection, or other response to the Motion has been received. Undersigned counsel further certifies that she has reviewed the docket in this case and no answer, objection, or other response to the Motion appears thereon.

5. Accordingly, the undersigned respectfully requests that the Court enter the order attached hereto as Exhibit 1 in accordance with the procedures described in the Case Management Order.

Dated: January 17, 2018

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ Maria A. Bove*

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**EXHIBIT 1**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
	:	
<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>RUNWAY LIQUIDATION</b>	:	<b>Case No. 17-10466 (SCC)</b>
<b>HOLDINGS, LLC, et al.,<sup>1</sup></b>	:	
	:	<b>Jointly Administered</b>
<b>Debtors.</b>	:	
-----X		

**ORDER EXTENDING THE PERIOD TO FILE OBJECTIONS TO CLAIMS**

Upon the motion (the “Motion”)<sup>2</sup> of the Plan Administrator, on behalf of the Post-Effective Date Debtors, for entry of an order (this “Order”), pursuant to sections 105(a) and 1142(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9006(b) of the Federal Rules of Bankruptcy Procedure to extend the Claim Objection Bar Date and further extend the Administrative Claim Objection Bar Date, as more fully described in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that the venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Plan Administrator’s notice of the Motion and opportunity for a hearing thereon were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted

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<sup>1</sup> A list of the Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number include: Runway Liquidation Holdings, LLC (6857); Runway Liquidation, LLC (5942); Runway Liquidation Intermediate Holdings, LLC (3673); MR Liquidation, LLC (9200); and MMH Liquidation, LLC (3854).

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

herein; 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 Motion is granted as set forth herein.
2. The Claim Objection Bar Date and the Administrative Claim Objection Bar Date are extended through and including May 29, 2018.
3. This Order is without prejudice to the Plan Administrator's right to request further extension(s) of the Claim Objection Bar Date and/or Administrative Claim Objection Bar Date.
4. The Plan Administrator is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

New York, New York  
Dated: \_\_\_\_\_, 2018

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THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE