

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

KIKO USA, Inc.,

Debtor.¹

)
) Chapter 11
)
) Case No. 18-10069 (MFW)
)
) **Related to Docket Nos. 243, 247 and 248**
)

**CERTIFICATION OF NO OBJECTION TO
DEBTOR'S MOTION FOR ENTRY OF AN ORDER
(I) AUTHORIZING, BUT NOT DIRECTING, THE DEBTOR TO PAY
SEVERANCE OBLIGATIONS ABOVE THE STATUTORY LIMIT
SET FORTH IN 11 U.S.C. § 507(a)(4); AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtor and debtor-in-possession (the "Debtor") hereby certifies that:

1. On May 7, 2018, the *Debtor's Motion for Entry of an Order (I) Authorizing, but Not Directing, the Debtor to Pay Severance Obligations above the Statutory Limit Set Forth in 11 U.S.C. § 507(a)(4); and (II) Granting Related Relief* [Docket No. 243] (the "Motion") was filed with the Court.

2. Pursuant to the notice of the Motion and the order granting expedited consideration of the Motion [Docket Nos. 248 and 247, respectively], objections to the Motion were to be filed by May 18, 2018 at 12:00 p.m. (prevailing Eastern Time) (the "Objection Deadline").

3. The Objection Deadline has passed and no formal objections or responses were served upon the undersigned counsel or entered on the Court's docket.

4. Accordingly, the Motion may be granted.

¹ The last four digits of the Debtor's federal tax identification number are 0805. The principal place of business for the Debtor is 470 Park Avenue South, 15th Floor New York, NY, 10016.

WHEREFORE, the Debtor respectfully requests the entry of an Order, substantially in the form attached to the Motion and hereto as **Exhibit A**, at the earliest convenience of the Court.

Dated: May 18, 2018
Wilmington, Delaware

/s/ Monique B. DiSabatino
Mark Minuti (DE Bar No. 2659)
Monique B. DiSabatino (DE Bar No. 6027)
SAUL EWING ARNSTEIN & LEHR LLP
1201 N. Market Street, Suite 2300
P.O. Box 1266
Wilmington, Delaware 19899
Telephone: (302) 421-6840
Facsimile: (302) 421-5873
mark.minuti@saul.com
monique.disabatino@saul.com

-and-

Sharon L. Levine (admitted *pro hac vice*)
SAUL EWING ARNSTEIN & LEHR LLP
1037 Raymond Boulevard, Suite 1520
Newark, New Jersey 07102
Telephone: (973) 286-6718
Facsimile: (973) 286-6821
sharon.levine@saul.com

-and-

John S. Kaplan (admitted *pro hac vice*)
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-8408
Facsimile: (206) 359-9408
jkaplan@perkinscoie.com

-and-

Jeffrey D. Vanacore (admitted *pro hac vice*)
PERKINS COIE LLP
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112-0085
Telephone: (212) 262-6912
Facsimile: (212) 977-1642
jvanacore@perkinscoie.com

Counsel for Debtor and Debtor in Possession