IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

Case No.: 21-11001 (JTD)

In re: Chapter 11 (Subchapter V)

SHARITY MINISTRIES, INC., 1

Debtor. Ref. No. 10

CERTIFICATION OF COUNSEL

I, Nicolas E. Jenner, proposed counsel to the above-captioned debtor and debtor in possession (the "<u>Debtor</u>") hereby certify as follows to the best of my knowledge, information and belief:

- 1. On July 8, 2021 (the "<u>Petition Date</u>"), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* in the United States Bankruptcy Court for the District of Delaware (the "<u>Court</u>").
- 2. On the Petition Date, the Debtor filed the Debtor's Motion for Entry of an Order (I) Approving the Scope of Notice with Respect to the Debtor's Members, (II) Approving Opt-In Procedure for Additional Notice, and (III) Granting Related Relief [D.I. 10] (the "Motion").
- 3. On July 29, 2021, the United States Trustee filed the *United States Trustee's Omnibus Objection and Request for Adjournment Concerning Certain Second Day Motions and Reservation of Rights as to all Other Motions* [D.I. 78] (the "<u>UST's Objection</u>"). The Debtor also received informal comments on the proposed form of order from the United States Trustee (the "<u>UST's Informal Comments</u>," collectively with the UST's Objection, the "<u>UST's Response</u>").

{1325.002-W0065510.}

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¹ The last four digits of the Debtor's federal tax identification number is 0344. The Debtor's mailing address is 821 Atlanta Street, Suite 124, Roswell, GA 30075.

- 4. To resolve the UST's Response, the Debtor has revised the proposed form of order (the "Revised Order"), a copy of which is attached hereto as Exhibit A. A copy of the Revised Order compared against the proposed order attached to the Motion is attached hereto as Exhibit B. The UST and the Subchapter V Trustee have no objection to the entry of the Revised Order. In accordance with the Court's electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.
- 5. Accordingly, the Debtor respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: August 19, 2021 Wilmington, Delaware

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/s/ Nicolas E. Jenner

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