

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

In re

SRG Winddown, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-11973 (MFW)

(Jointly Administered)

Re: D.I. 227 & 364

**CERTIFICATION OF COUNSEL REGARDING STIPULATION BY
AND BETWEEN GOLDMAN SACHS SPECIALTY LENDING GROUP, L.P.
AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FURTHER EXTENDING CHALLENGE PERIOD UNDER FINAL DIP ORDER**

I, Erin R. Fay, counsel to the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned chapter 11 cases of the above-captioned debtors (collectively, the “Debtors”), respectfully certify and state as follows:

1. On September 17, 2019, the Office of the United States Trustee appointed the Committee in these cases [D.I. 97].

2. On October 8, 2019, the Court entered the *Final Order (I) Authorizing the Debtors to Obtain Postpetition Secured Financing, (II) Granting Liens and Superpriority Administrative Expense Status, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, and (V) Authorizing the Debtors’ Use of Cash Collateral* [D.I. 227] (the “Final DIP Order”).²

3. Pursuant to the Final DIP Order, the Challenge Period was set to expire as to the Committee on November 18, 2019.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number or Canadian Revenue Agency, as applicable are: (1) Sugarfina, Inc., a Delaware corporation (4356); (2) Sugarfina International, LLC, a Delaware limited liability company (1254); and (3) Sugarfina (Canada), Ltd. (4480). The location of the Debtors’ corporate headquarters is 1700 E. Walnut Ave., 5th Floor, El Segundo, California 90245.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Final DIP Order.

4. On November 12, 2019, the Court entered the *Order Approving Stipulation by and Between Goldman Sachs Specialty Lending Group, L.P. and the Official Committee of Unsecured Creditors Extending Challenge Period Under Final DIP Order* [D.I. 364] (the “Order”). Pursuant to the Order, the Challenge Period was extended as to the Committee through and including December 16, 2019.

5. To facilitate settlement discussions regarding any potential Challenge that might be brought by the Committee, Goldman Sachs Specialty Lending Group, L.P. (“Goldman”) and the Committee have stipulated (the “Stipulation”) to further extend the Challenge Period, as it relates to Goldman, solely for the Committee through and including December 20, 2019. Attached hereto as Exhibit A is a proposed order (the “Order”) approving the Stipulation. A copy of the Stipulation is attached to the Order as Exhibit 1.

WHEREFORE, the Committee respectfully requests that the Court enter the Order approving the Stipulation at its earliest convenience.

Dated: December 16, 2019
Wilmington, Delaware

BAYARD, P.A.

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