

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

In re:

SGR Winddown, Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-11973 (MFW)

(Jointly Administered)

RE: D.I. 709, 710, 726, 739, 740, 773

CERTIFICATION OF COUNSEL

The undersigned counsel to debtor SGR Winddown, Inc., a Delaware corporation, and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby certifies as follows:

1. On September 6, 2019 (the “Petition Date”), the Debtors filed voluntary petitions for relief under Chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. On February 21, 2020, Global Apogee filed an unliquidated, undetermined proof of claim, stemming from *Global Apogee v. Sugarfina, Inc., Joshua Reznick, Rosie O’Neill, JOHN DOES 1-10 and BUSINESES 1-10*, filed on June 11, 2018, in the United States District Court for the Central District of California at docket number 2:18-cv-cv-05162-RSWL-E [Claim No. 190] (the “Claim”).

3. On September 3, 2020, the Debtors filed the *Debtors’ First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and*

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) SGR Winddown, Inc. (4356), (2) SGR Winddown International, LLC (1254) and (3) SGR Canada Winddown Legacy, Ltd. (4480). The location of the Debtors’ corporate headquarters is 4712 Admiralty Way #552, Marina Del Rey, CA 90292.

Del. L.R. 3007-1 (Amended Claims; Duplicate Claims; and Late-Filed Claims) [Docket 709] (the “First Omnibus Objection”).

4. On September 3, 2020, the Debtors filed the *Debtors’ Second Omnibus Objection (Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (No Liability Claims; Reduce & Allow Claims; Reclassify Claims; and Reduce, Reclassify & Allow Claims)* [Docket 710] (the “Second Omnibus Objection”, collectively with the First Omnibus Objection, the “Objections”).

5. On October 7, 2020, Creditor Global Apogee filed its Response in Opposition to the First Omnibus Objection [Docket 726].

6. On October 7, 2020, Creditor Global Apogee filed its Response in Opposition to the Second Omnibus Objection [Docket 725].

7. After discussions, the Parties have reached a global resolution and agreed to resolve the Objections as they relate to the Claim. The Debtors and Global Apogee have entered into a stipulation (the “Stipulation”), a copy of which is attached hereto as Exhibit A, detailing the foregoing.

8. The Stipulation was filed on the docket at Docket Number 773.

9. The Debtors and Global Apogee respectfully request that the Court enter the order attached hereto as Exhibit B approving the Stipulation between the Debtors and Global Apogee.

Dated: February 11, 2021

MORRIS JAMES LLP

/s/ Brya M. Keilson

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