

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

In re:

JC USA, Inc., *et al.*,¹

Debtors.

)
)
)
)
)
)
)

Chapter 7

Case No. 23-10585 (JKS)

(Jointly Administered)

Related D.I. 646, 665

**AMENDED² NOTICE OF DEADLINE TO FILE REQUESTS FOR PAYMENT OF CERTAIN
ADMINISTRATIVE EXPENSE CLAIMS PURSUANT TO 11 U.S.C. § 503(b)**

**TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE ESTATES OF
THE ABOVE-CAPTIONED CHAPTER 7 DEBTORS**

PLEASE TAKE NOTICE that on May 5, 2023 (the “Petition Date”), JC USA, Inc.. and its affiliated debtors (the “Debtors”) filed voluntary petitions for relief under chapter 7 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), commencing the above-captioned cases (the “Cases”).

PLEASE TAKE FURTHER NOTICE that the Office of the United States Trustee for the District of Delaware has appointed Don A. Beskrone as the Chapter 7 Trustee (the “Trustee”) for the Debtors’ estates (the “Estates”) and the Trustee now serves as the trustee in these Cases pursuant to 11 U.S.C. § 702(d).

PLEASE TAKE FURTHER NOTICE that, on June 29, 2026, the Bankruptcy Court entered the *Amended Order (i) Establishing the Deadline to File Requests for Payment of Certain Administrative Expense Claims Pursuant to 11 U.S.C. § 503(b), (ii) Approving Form and Manner of*

¹ The Debtors in these cases, along with the last four digits of their federal tax identification numbers, are: JC USA, Inc. (0028), JC Franchising, Inc. (7656), New JC Holdings, Inc. (1506), JC Acquisition, Inc. (2395), JC Inter. Holdings, Inc. (3621) JC Hold, LLC (4170).

² This Amended Notice of Deadline to File Requests for Payment Certain Administrative Expense Claims Pursuant to 11 U.S.C. § 503(b) (the “Administrative Claim Bar Date Notice”) revises and supersedes the Notice of Deadline to File Requests for Payment Certain Administrative Expense Claims Pursuant to 11 U.S.C. § 503(b) filed June 16, 2026 [D.I. 656].

Notice Thereof and (iii) Granting Related Relief [D.I. 665] (the “Administrative Claim Bar Date Order”).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Administrative Claim Bar Date Order, the deadline for all persons or entities (except as otherwise provided in the Administrative Claim Bar Date Order) asserting any right to payment arising on or after the Petition Date constituting an actual, necessary cost or expense of administering the bankruptcy Cases or preserving the Estates (an “Administrative Claim”) to file requests for payment pursuant to section 503(b) of the Bankruptcy Code (a “Request for Payment”) shall be August 13, 2026, at 5:00 p.m. (Prevailing Eastern Time) (the “Administrative Claim Bar Date”).

You should consult an attorney if you have any questions, including whether to file a Request for Payment. If you have any questions with respect to this Administrative Claim Bar Date Notice, you may contact undersigned counsel for the Trustee.

I. WHO MUST FILE A REQUEST FOR PAYMENT.

Except for claims described in Section II below, you **MUST** file a Request for Payment in accordance with the procedures approved by the Bankruptcy Court and set forth in this Administrative Claim Bar Date Notice in order to assert an Administrative Claim for an actual, necessary cost or expense of administering the bankruptcy Cases or preserving the Estates under section 503(b) of the Bankruptcy Code.

II. WHO IS NOT REQUIRED TO FILE A REQUEST FOR PAYMENT.

The following persons and entities are **not** required to file a Request for Payment:

- (a) the U.S. Trustee, on account of any claims for fees payable pursuant to 28 U.S.C. § 1930;
- (b) any person or entity that has already timely and properly filed a Request for Payment asserting an Administrative Claim against the Debtors’ Estates in a form and manner substantially similar to that proposed in this Motion or by

filing such claim on the Debtor(s)' claims register;

- (c) The Trustee's Chapter 7 professionals retained in the Debtors' cases, which shall file requests for allowance of fees and expenses in accordance with their retention agreements.

You should not file a Request for Payment if you do not have an Administrative Claim against the Debtors' Estates. Your receipt and/or the filing of this Administrative Claim Bar Date Notice does not mean that you have an Administrative Claim (or any claim) or that the Trustee or the Bankruptcy Court believes that you have an Administrative Claim (or any claim).

III. HOW TO FILE AND SERVE REQUESTS FOR PAYMENT.

To file a Request for Payment, a party asserting an Administrative Claim must follow the procedures set forth below:

- (a) Each Request for Payment must: (i) comply with section 503 of the Bankruptcy Code, the Administrative Claim Bar Date Order and the Administrative Claim Bar Date Notice; (ii) be in writing and signed by the party asserting the Administrative Claim or an authorized agent of such party; (iii) set forth with specificity all factual and legal bases supporting the asserted Administrative Claim; (iv) include supporting documentation (or, if voluminous, include a summary of supporting documents, an explanation as to why such documentation is not included, and a concise description of the means by which the Trustee can reasonably and expeditiously obtain such supporting documents); (v) be in the English language; and (vi) be denominated in United States currency.
- (b) Each Request for Payment must be filed with the Bankruptcy Court in the lead case (Case No. 23-10585) of the jointly administered Cases by the Administrative Claim Bar Date.
- (c) Each Request for Payment must also be served upon, so as to be actually received by, undersigned counsel for the Trustee by the Administrative Claim Bar Date via regular mail, overnight mail, hand delivery, or electronic mail as follows:

If by First Class Mail, Overnight Mail or Hand Delivery:

Ricardo Palacio, Esq.
Benjamin W. Keenan, Esq.
Ashby & Geddes, P.A.

500 Delaware Avenue, 8th Floor
P.O. Box 1150
Wilmington, Delaware 19899

RE: JC USA, Inc., *et al.*, Case No. 23-10585 (JKS)
(Jointly Administered) Request for
Payment/Administrative Claim.

If by Electronic Mail:

rpalacio@ashbygeddes.com;
and
bkeenan@ashbygeddes.com

RE: JC USA, Inc., *et al.*, Case No. 23-10585 (JKS)
(Jointly Administered) Request for
Payment/Administrative Claim.

IV. EFFECT OF FAILURE TO FILE A TIMELY REQUEST FOR PAYMENT.

ABSENT FURTHER ORDER OF THE COURT, ANY POTENTIAL HOLDER OF AN ADMINISTRATIVE CLAIM AGAINST THE DEBTORS' ESTATES WHO RECEIVES NOTICE OF THE ADMINISTRATIVE CLAIM BAR DATE (WHETHER SUCH NOTICE WAS ACTUALLY OR CONSTRUCTIVELY RECEIVED) AND IS REQUIRED, BUT FAILS, TO FILE A REQUEST FOR PAYMENT, AS APPLICABLE, IN ACCORDANCE WITH THE ADMINISTRATIVE CLAIM BAR DATE ORDER AND THE ADMINISTRATIVE CLAIM BAR DATE NOTICE, (A) SHALL BE FOREVER BARRED, ESTOPPED AND ENJOINED FROM ASSERTING SUCH CLAIM AGAINST THE DEBTORS OR THEIR ESTATES AND (B) SHALL NOT RECEIVE OR BE ENTITLED TO RECEIVE ANY PAYMENT OR DISTRIBUTION OF PROPERTY FROM THE ESTATES WITH RESPECT TO SUCH ADMINISTRATIVE CLAIM, AS APPLICABLE.

V. NO REQUEST FOR SCHEDULING OF HEARING ON REQUESTS FOR PAYMENT.

Notwithstanding section 503(b) of the Bankruptcy Code, any Requests for Payment shall be

filed without a scheduled hearing date and response deadline or a request by the claimant for a scheduled hearing. To the extent an Administrative Claim is disputed by the Trustee, and such dispute cannot be resolved consensually by the Trustee and the claimant, the Trustee shall: (a) file an objection to the claimant's Request for Payment; (b) request a hearing on such objection and the affected Request for Payment; and (c) provide notice to the affected claimant of the Trustee's objection and scheduled hearing.

VI. SOLE AND EXCLUSIVE METHOD TO ASSERT ADMINISTRATIVE CLAIM.

The procedures set forth in this Administrative Claim Bar Date Notice are the sole and exclusive method for the assertion of any Administrative Claim that is required to be filed, and all claimants asserting an Administrative Claim are prohibited from invoking any other means of asserting such claims pursuant to the Bankruptcy Code.

VIII. RESERVATION OF RIGHTS.

Nothing contained in this Motion or any actions taken by the Trustee pursuant to the relief to be granted in the Administrative Claim Bar Date Order is intended or should be construed as: (a) an admission as to the validity, status, amount or priority of any particular claim asserted against the Debtors or their Estates; (b) a waiver of the Trustee's rights to dispute any particular claim on any grounds; (c) a promise or obligation to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Motion; or (e) a waiver or limitation of the Trustee's rights under the Bankruptcy Code or any other applicable law.

Dated: June 16, 2026
Wilmington, Delaware

ASHBY & GEDDES

/s/ Benjamin W. Keenan

Ricardo Palacio (#3765)

Benjamin W. Keenan (#4724)

500 Delaware Avenue, 8th Floor

P.O. Box 1150

Wilmington, Delaware 19899

Telephone: (302) 654-1888

rpalacio@ashbygeddes.com

bkeenan@ashbygeddes.com

*Counsel for Don A. Beskrone,
Chapter 7 Trustee*