

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

)	
In re:)	Chapter 11
)	
LL Flooring Holdings, Inc., <i>et al.</i> , ¹)	Case No. 24-11680 (BLS)
)	
Debtors.)	(Jointly Administered)
)	
)	Hearing Date: January 26, 2026 at 10:30 a.m. (ET)
)	Response Deadline: December 29, 2025 at 4:00 p.m. (ET)

**LIQUIDATING TRUSTEE’S SECOND MOTION FOR ENTRY OF
AN ORDER EXTENDING THE TIME TO FILE OBJECTIONS TO CLAIMS**

Steven Balasiano, in his capacity as the liquidating trustee (“Liquidating Trustee”)² of the LL Flooring Liquidating Trust, hereby submits this motion (the “Motion”), pursuant to section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”) and Rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), extending the Claims Objection Deadline (as defined below) to June 15, 2026. In support of the Motion, the Liquidating Trustee respectfully states as follows:

Jurisdiction and Venue

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the “Court”) under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United

¹ The Debtors in these chapter 11 cases, along with the last four (4) digits of their respective tax identification numbers, are as follows: LL Flooring Holdings, Inc. (0817); LL Flooring, Inc. (9199); Lumber Liquidators Leasing, LLC (N/A); LL Flooring Services, LLC (5960); and Lumber Liquidators Foreign Holdings, LLC (4568). The address for correspondence related to the Debtors and/or the Liquidating Trust is c/o LL Flooring Liquidating Trust, 27 Crimson King Drive, Bear, DE 19701.

² Capitalized terms used but not otherwise defined in this Motion shall have the meanings ascribed to them in the Plan (as defined below).

States District Court for the District of Delaware dated February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and, pursuant to Rule 9013-1(f) of Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the Liquidating Trustee consents to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

2. Venue is proper in this District under 28 U.S.C. §§ 1408 and 1409.

3. The statutory and legal basis for the relief requested herein are § 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006(b)(1), and Local Rule 9006-1.

Background

4. On August 11, 2024, LL Flooring Holdings, Inc. and its affiliated debtors in the above-captioned chapter 11 cases (collectively, the “Debtors”) each commenced a voluntary case under chapter 11 of the Bankruptcy Code with the Court.

5. On September 30 and October 3, 2024, the Debtors filed their Schedules of Assets and Liabilities and Statements of Financial Affairs (together, the “Schedules and Statements”) [Docket Nos. 369–373]. Among other things, the Schedules and Statements set forth the claims of known creditors against the Debtors as of the Petition Date, based upon the Debtors’ books and records.

6. On October 4, 2024, the Court entered the *Order (I) Establishing a General Bar Date to File Proofs of Claim, (II) Establishing a Bar Date to File Proofs of Claim by Governmental Units, (III) Establishing a Rejection Damages Bar Date, (IV) Establishing an Amended Schedules Bar Date, (V) Approving the Form and Manner for Filing Proofs of Claim, (VI) Approving the Proposed Notices of Bar Dates, (VII) Approving Procedures With Respect to Service of the*

Proposed Notice of Bar Dates, (VIII) Authorizing the Debtors to Serve the Customer Notice By Email, and (IX) Granting Related Relief [Docket No. 408] (the “Bar Date Order”), which established, inter alia, November 1, 2024 at 11:59 p.m. (ET) as the deadline for all entities, other than governmental units, to file prepetition proofs of claim against the Debtors, including claims pursuant to § 503(b)(9) of the Bankruptcy Code. The Bar Date Order also established February 7, 2025 at 11:59 p.m. (ET) as the deadline for governmental units to file prepetition proofs of claim against the Debtors.

7. On December 18, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving the Disclosure Statement on a Final Basis and Confirming the Second Amended Joint Chapter 11 Plan of Liquidation for LL Flooring Holdings, Inc. and Its Affiliated Debtors* [Docket No. 701] (the “Confirmation Order”). The Confirmation Order, inter alia, confirmed the *Second Amended Joint Chapter 11 Plan of Liquidation for LL Flooring Holdings, Inc. and Its Affiliated Debtors* [Docket No. 668] (as amended, the “Plan”). The effective date of the Plan occurred on December 20, 2024 (the “Effective Date”). See Docket No. 718.

8. As set forth in the Plan, applications seeking allowance and payment of Administrative Claims had to be filed and served no later than January 21, 2025. See Plan Art. II.A; Docket No. 718.

9. Upon the Effective Date, pursuant to the terms of the Plan and Confirmation Order, the LL Flooring Liquidating Trust (the “Trust”) was established, and Steven Balasiano was appointed as the trustee and administrator of the Trust. See Confirmation Order ¶¶ 87, 92; Plan Art. IV.C. Pursuant to his appointment, the Liquidating Trustee was granted authority to, among other things, object to Claims, including Administrative Claims. See Confirmation Order ¶ 92; Plan Art. IV.C.5(d).

10. The Liquidating Trustee has until the Claims Objection Deadline to file objections to Claims, including applications seeking allowance and payment of Administrative Claims. *See* Plan Art. II.A. The Claims Objection Deadline is defined in the Plan as “the deadline for objecting to a Claim, which shall be on the date that is the later of (a) 180 days after the Effective Date and (b) such other deadline as may be fixed by an order of the Bankruptcy Court for objecting to such Claims” (the “Claims Objection Deadline”). *See* Plan Art. I.A.17. The Plan permits the Court to extend the Claims Objection Deadline upon a motion by the Liquidating Trustee. *See* Plan Art. VII.E. The Plan initially set a deadline to file objections to claims, including Administrative Claims, as 180 days after the Effective Date (i.e. June 18, 2025).

11. On June 4, 2025, the Liquidating Trustee filed the *Liquidating Trustee’s Motion for Entry of an Order Extending the Time to File Objections to Claims* extending the Claims Objection Deadline to December 15, 2025 [Docket No. 882], which was approved on June 13, 2025 [Docket No. 887].

Relief Requested

12. By this Motion, the Liquidating Trustee requests an extension of the Claims Objection Deadline through and including June 15, 2026 (i.e. 180 days from the current deadline of December 15, 2025)³ without prejudice to the rights of the Liquidating Trustee or any other party in interest to seek further extensions of the Claims Objection Deadline.⁴

³ Because 180 days from December 16, 2025 falls on Saturday, June 13, 2026, the deadline rolls until the next business day, which is Monday, June 15, 2026. *See* FED. R. BANKR. P. 9006(a).

⁴ Pursuant to Local Rule 9006-2, the Claims Objection Deadline is automatically extended until the Court acts on this Motion.

Basis for the Relief

13. Section 105(a) of the Bankruptcy Code provides, in pertinent part, that the Court may “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions [of the Bankruptcy Code].” 11 U.S.C. § 105(a).

14. Bankruptcy Rule 9006(b)(1) provides that a court may “with or without motion or notice order [a] period enlarged if the request therefore is made before the expiration of the period originally prescribed or as extended by a previous order.” *See* FED. R. BANKR. P. 9006(b)(1).

15. Furthermore, pursuant to the terms of the Plan, the Claims Objection Deadline may be extended upon a motion to the Court. *See* Plan Art. I.A.17 (defining “Claims Objection Deadline” as “the deadline for objecting to a Claim, which shall be on the date that is the later of (a) 180 days after the Effective Date and (b) such other deadline as may be fixed by an order of the Bankruptcy Court for objecting to such Claims.”).

16. There are approximately 3,970 claims asserting over \$488.2 million in liabilities allegedly owed by the Debtors and the Debtors’ estates in these chapter 11 cases. Since the Effective Date, the Liquidating Trustee and his professionals have worked to review, analyze, and resolve requests for payment of administrative claims and proofs of claim filed in these chapter 11 cases.

17. While the Liquidating Trustee has reconciled and resolved many of the claims, he has determined, based upon a valid exercise of his business judgment, that he requires additional time to reconcile all of the filed claims, including requests for payment of administrative claims, and consensually resolve such claims and requests or prepare objections thereto, if necessary.

18. Accordingly, the Liquidating Trustee requests an extension of the Claims Objection Deadline by 180 days through and including June 15, 2026.

Notice

19. Notice of this Motion shall be provided to: (i) the U.S. Trustee and (ii) all parties who have filed a post-Effective Date renewed request for notices pursuant to Bankruptcy Rule 2002. The Liquidating Trustee submits that, in light of the nature of the Motion, no other or further notice is required.

Conclusion

WHEREFORE, the Liquidating Trustee respectfully requests that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, (i) extending the Claims Objection Deadline to June 15, 2026 and (ii) granting such other and further relief as the Court may deem just and proper.

Dated: December 11, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Michael E. Fitzpatrick
Justin R. Alberto (No. 5126)
Patrick J. Reilley (No. 4451)
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Counsel to the Liquidating Trustee

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

In re:)	
)	Chapter 11
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LL Flooring Holdings, Inc., <i>et al.</i> , ¹)	Case No. 24-11680 (BLS)
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Debtors.)	(Jointly Administered)
)	
)	Hearing Date: January 26, 2026 at 10:30 a.m. (ET)
)	Response Deadline: December 29, 2025 at 4:00 p.m. (ET)

**NOTICE OF LIQUIDATING TRUSTEE’S SECOND MOTION FOR ENTRY
OF AN ORDER EXTENDING THE TIME TO FILE OBJECTIONS TO CLAIMS**

PLEASE TAKE NOTICE that on December 11 2025, Steven Balasiano, solely in his capacity as the liquidating trustee (the “Liquidating Trustee”) in the above-captioned chapter 11 cases, by and through his undersigned counsel, filed the *Liquidating Trustee’s Second Motion for Entry of an Order Extending the Time to File Objections to Claims* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **January 26, 2026 at 10:30 a.m. (ET)** (the “Hearing”) before The Honorable Brendan L. Shannon, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 6th Floor, Courtroom No. 1, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the entry of an order granting the relief sought in the Motion must be in writing and filed with the Court on or before **December 29, 2025 at 4:00 p.m. (ET)** (the “Objection Deadline”). At the same time, you must

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serve a copy of the response or objection upon the undersigned counsel to the Liquidating Trustee so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: December 11, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Michael E. Fitzpatrick
Justin R. Alberto (No. 5126)
Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
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Counsel to the Liquidating Trustee

EXHIBIT A

Proposed Order

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

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In re:)	Chapter 11
)	
LL Flooring Holdings, Inc., <i>et al.</i> , ¹)	Case No. 24-11680 (BLS)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. ____

ORDER EXTENDING THE TIME TO FILE OBJECTIONS TO CLAIMS

Upon the motion (the “Motion”)² of the Liquidating Trustee for entry of an order (this “Order”) extending the Claims Objection Deadline to June 15, 2026, all as more fully set forth in the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b), and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U. S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances; and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and this Court having held a hearing, if necessary, to consider the relief requested in the Motion (the “Hearing”); and upon the record of the Hearing, if any; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

requested in the Motion is in the best interests of the Debtors, their estates, their creditors and all parties in interest; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted to the extent set forth herein.
2. The Claims Objection Deadline is hereby extended through and including June 15, 2026, without prejudice to the right of the Liquidating Trustee or any other party in interest to seek further extensions of the Claims Objection Deadline.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or relating to the interpretation, implementation, or enforcement of this Order.