

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

In re

CHG US Holdings LLC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-10851 (MFW)

Jointly Administered

Re: D.I. 173, 235

**NOTICE OF BID PROCEDURES, AUCTION,  
AND DEADLINES RELATING TO THE SALE OF ALL OR  
SUBSTANTIALLY ALL OF THE ASSETS OF THE DEBTORS**

**PLEASE TAKE NOTICE** that on June 6, 2025, the debtors and debtors in possession (the “Debtors”) in the above-captioned cases (the “Bankruptcy Cases”), filed the *Motion for Entry of an Order (I) Approving Bid Procedures in Connection with the Sale of All or Substantially All of the Debtors’ Assets, (II) Scheduling Bid Deadline and Auction, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (V) Granting Related Relief* [D.I. 173] (the “Bid Procedures Motion”).<sup>2</sup> The Debtors seek to complete a sale (the “Sale”) of all or substantially all of their assets (the “Assets”) to a prevailing bidder or bidders (the “Successful Bidder”) at an auction (the “Auction”), free and clear of all liens, claims, encumbrances and other interests pursuant to section 363 of the Bankruptcy Code, with all such liens, claims, encumbrances, and other interests attaching with the same validity and priority to the Sale proceeds.

**PLEASE TAKE FURTHER NOTICE** that, on June 23, 2025, the Court entered an order [D.I. 235] (the “Bid Procedures Order”) approving the bid procedures set forth in the Bid Procedures Motion (the “Bid Procedures”), which set the key dates and times related to the Sale of the Debtors’ Assets. **All interested bidders should carefully read the Bid Procedures.** To the extent there are any inconsistencies between the Bid Procedures and the summary description of the terms and conditions contained in this notice, the terms of the Bid Procedures shall control.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Bid Procedures, the Debtors must receive a Qualified Bid for the Assets from any interested bidder, in writing on or before **July 18, 2025, at 4:00 p.m. (prevailing Eastern Time)**, or such later date as may be agreed to by the Debtors (the “Bid Deadline”) after consultation with the Consultation Parties. To be considered,

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are as follows CHG US Holdings LLC (9685); PLANTA Bethesda LLC (5177); PLANTA Brooklyn LLC (4261); PLANTA SOHO LLC (5947); PLANTA Nomad LLC (2226); PLANTA DC LLC (7448); PLANTA P Street LLC (2713); PLANTA KROG LLC (6124); PLANTA Denver LLC (1868); PLANTA WEHO LLC (2741); Planta West Palm Beach LLC (1752); PLANTA Miami Beach LLC (6454); PLANTA River North LLC (5587); PLANTA CocoWalk GP LLC (5347); PLANTA FLL LLC (6245); PLANTA Buckhead LLC (6467); PLANTA Brentwood LLC (7390); and PLANTA Marina LLC (6511). The Debtors’ mailing address is 3015 Grand Avenue, Suite 201, Coconut Grove, FL 33133.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings set forth in the Bid Procedures Motion.

Qualified Bids must be sent to the following on or before the Bid Deadline: (i) the Debtors' investment bankers, Cassel Salpeter & Co., LLC, Attn: Philip Cassel (pcassel@cs-ib.com) and James S. Cassel (jcassel@cs-ib.com), and (ii) counsel to the Debtors, Pashman Stein Walder Hayden, P.C., Attn: Joseph C. Barsalona II (jbarsalona@pashmanstein.com), Michael J. Custer (mcuster@pashmanstein.com), and Katherine R. Beilin (kbeilin@pashmanstein.com).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the terms of the Bid Procedures, if the Debtors receive one or more Qualified Bids by the Bid Deadline, the Auction for the sale of the Assets will be conducted on **July 21, 2025 at 10:00 a.m. (prevailing Eastern Time)**, at Pashman Stein Walder Hayden, P.C., Court Plaza South, East Wing, 21 Main Street, Suite 200, Hackensack, NJ 07601, or at such other place, date and time as may be designated by the Debtors.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the terms of the Bid Procedures, the Debtors have designated certain Assigned Contracts that may be assumed or assumed and assigned to the Successful Bidder. Within ten (10) days of entry of the Bid Procedures Order, the Debtors shall send a notice to each counterparty to an Assigned Contract setting forth the Debtors' calculation of the cure amount, if any, that would be owing to such counterparty if the Debtors decided to assume or assume and assign such Assigned Contract, and alerting such nondebtor party that their contract may be assumed and assigned to the Successful Bidder (the "**Assignment Notice**").

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the terms of the Bid Procedures, any counterparty (each, an "**Assigned Contract Counterparty**") that objects to the cure amount set forth in the Assignment Notice or the possible assignment of their Assigned Contract(s) to a Successful Bidder must file with the Court and serve an objection (an "**Assigned Contract Objection**") so that it is actually received no later than fourteen (14) days after the service of the Assignment Notice (the "**Assigned Contract Objection Deadline**"), by the following parties (the "**Objection Notice Parties**"): (i) counsel to the Debtors, Pashman Stein Walder Hayden, P.C., Attn: Joseph C. Barsalona II (jbarsalona@pashmanstein.com), Michael J. Custer (mcuster@pashmanstein.com), and Katherine R. Beilin (kbeilin@pashmanstein.com); (ii) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Jonathan Lipshie (email: jon.lipshie@usdoj.gov); (iii) proposed counsel to the Committee in these Chapter 11 Cases, (i) Lowenstein Sandler LLP, 1251 Avenue of the Americas, New York, New York 10020, Attn: Gianfranco Finizio (gfinizio@lowenstein.com) and Kelly E. Moynihan (kmoynihan@lowenstein.com), and (ii) Potter Anderson & Corroon LLP, 1313 N. Market St., 6<sup>th</sup> Floor, Wilmington, Delaware 19801, Attn: Christopher Samis (csamis@potteranderson.com) and Aaron Stulman (astulman@potteranderson.com); (d) counsel to Anchorage Illiquid Opportunities Master VI (B), L.P., (i) Morrison & Foerster LLP, 250 West 55th Street, Floor 20, New York, New York 10019, Attn: Benjamin W. Butterfield, Esq. (butterfield@mofo.com) and Ilayna M. Guevrekian, Esq. (iguevrekian@mofo.com) and (ii) Benesch Friedlander Coplan & Aronoff LLP, 1313 North Market Street, Suite 1201, Wilmington, Delaware 19801, Attn: Kevin M. Capuzzi (KCapuzzi@beneschlaw.com) and John C. Gentile (JGentile@beneschlaw.com).

**PLEASE TAKE FURTHER NOTICE** that upon the conclusion or cancelation of the Auction, as applicable, but in no event later than **July 22, 2025 at 9:00 a.m. (prevailing Eastern Time)**, the Debtors will file with the Court and serve on the Sale Notice Parties a notice of the Successful Bidder and Back-Up Bidder, if any, for the Assets (the “**Successful Bidder Notice**”).

**PLEASE TAKE FURTHER NOTICE** that Objections, if any, to the Sale to the Successful Bidder or Back-Up Bidder, as applicable, or the ability of the Successful Bidder to provide adequate assurance of future performance under an Assigned Contract (a “**Successful Bidder Objection**”) must: (a) be in writing and specify the nature of such objection, (b) comply with the Bankruptcy Rules and the Local Rules, (c) be filed with the Court no later than **12:00 p.m. (prevailing Eastern Time) on July 28, 2025**, *provided, however*, that in the event the Debtors cancel the Auction and serve the Successful Bidder Notice prior to July 21, 2025, the deadline to object to the Sale shall be by 4:00 p.m. (prevailing Eastern Time) on the date that is seven (7) days following service of the Successful Bidder Notice (the “**Successful Bidder Objection Deadline**”), and (d) be served on the Objection Notice Parties by the Successful Bidder Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that a Successful Bidder Objection must be served on the Objection Notice Parties so it is actually received by the Successful Bidder Objection Deadline and filed with the Clerk of the Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, DE 19801. If an Assigned Contract Objection or a Successful Bidder Objection is not served on the Objection Notice Parties and filed with the Clerk of the Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, DE 19801, so that it is actually received no later than, respectively, the Assigned Contract Objection Deadline or the Successful Bidder Objection Deadline, the relevant parties will be forever barred from objecting to (a) the Debtors’ proposed cure amount, (b) the identity of the Successful Bidder, or (c) the assignment of that party’s executory contract or unexpired lease to the Successful Bidder.

**PLEASE TAKE FURTHER NOTICE** that where an Assigned Contract Counterparty to an Assigned Contract files a timely Assigned Contract Objection or Successful Bidder Objection objecting to the possible assignment of its executory contract or unexpired lease to the Successful Bidder, and the parties are unable to consensually resolve the dispute, the Debtors’ ability to assign the Assigned Contract to the Successful Bidder will be determined by the Court at the Sale Hearing or at a subsequent hearing on a date and time to be agreed between the parties, subject to Court availability.

**PLEASE TAKE FURTHER NOTICE** that where an Assigned Contract Counterparty to an Assigned Contract files a timely Assigned Contract Objection asserting a higher cure amount than the amount listed in the Assignment Notice, and such objection is not withdrawn or resolved by the time of the Sale Hearing, such cure objections will not be heard at the Sale Hearing. Any dispute regarding the cure amounts will either be resolved consensually, if possible, or, if the parties are unable to resolve such dispute, at a later date as set by the Court. The Debtors shall file and serve a notice of hearing for the Court to consider the unresolved cure objection(s) at the next scheduled omnibus hearing after the Sale Hearing unless the Debtors and the objecting parties agree to a different time and subject to the Court’s schedule.

**PLEASE TAKE FURTHER NOTICE** that to the extent any Assigned Contract Counterparty is added to the Assignment Notice after the initial notice is served, such new Assigned Contract Counterparty shall receive notice of the addition and the Debtors' proposed cure amount through a supplemental Assignment Notice, and that party shall have fourteen (14) days from the date of such notice to object to the propose cure amount and assignment to the Successful Bidder.

**PLEASE TAKE FURTHER NOTICE** that a hearing to approve the Sale of the Assets will be held (the "**Sale Hearing**") on **July 31, 2025, at 3:00 p.m. (prevailing Eastern Time)**. The Sale Hearing may be adjourned from time to time without further notice to creditors or parties in interest other than by announcement of the adjournment in open court on the date scheduled for the Sale Hearing or on the agenda for such Sale Hearing.

**PLEASE TAKE FURTHER NOTICE THAT ANY PARTY WHO FAILS TO TIMELY OBJECT TO THE SALE ON OR BEFORE THE SUCCESSFUL BIDDER OBJECTION DEADLINE, AS APPLICABLE, IN ACCORDANCE WITH THE BID PROCEDURES ORDER SHALL BE FOREVER BARRED FROM ASSERTING ANY SUCH OBJECTION, INCLUDING WITH RESPECT TO THE TRANSFER OF THE ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND OTHER INTERESTS.**

**PLEASE TAKE FURTHER NOTICE** that the Debtors are seeking to waive the fourteen-day stay period under Bankruptcy Rules 6004(h) and 6006(d) in order for the Sale to close immediately upon entry of the Sale Order by this Court.

**PLEASE TAKE FURTHER NOTICE** that this notice is subject to the full terms and conditions of the Bid Procedures Motion, the Bid Procedures Order and the Bid Procedures, which shall control in the event of any conflict, and the Debtors encourage parties in interest to review such documents in their entirety. A copy of the Bid Procedures Motion, the Bid Procedures and the Bid Procedures Order may be obtained for free by accessing the website of the Debtors' noticing agent, Stretto, Inc., located at <https://cases.stretto.com/CHG>.

Dated: June 25, 2025  
Wilmington, Delaware

**PASHMAN STEIN WALDER  
HAYDEN, P.C.**

*/s/ Michael J. Custer* \_\_\_\_\_

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-and-

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