IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
SUNPOWER CORPORATION, *et al.*,[1]	)	Case No. 24-11649 (CTG)
Wind-Down Debtor.	)	(Jointly Administered)
	)	**Hearing Date: July 21, 2026 at 10:00 a.m.** **Objection Deadline: July 13, 2026 at 4:00 p.m.**

JOINT MOTION OF THE PLAN ADMINISTRATOR AND THE CREDITOR TRUSTEE FOR ENTRY OF AN ORDER FURTHER ENLARGING THE PERIOD WITHIN WHICH THE PLAN ADMINISTRATOR AND/OR THE CREDITOR TRUSTEE MAY REMOVE ACTIONS

Mark Roberts, solely in his capacity as the plan administrator for the Debtors' wind-down estates (the "Plan Administrator") and Steven Balasiano, by and through MHR Advisory Group, LLC, in its capacity as the Creditor Trustee (the "Creditor Trustee" and, together with the Plan Administrator, the "Movants") of the SunPower Creditor Trust (the "Creditor Trust"), by and through their respective undersigned counsel, file this motion (this "Motion"), for entry of an order, substantially in the form attached as **Exhibit A** (the "Proposed Order"), further extending the deadline by which the Movants may file notices of removal under Fed. R. Bankr. P. 9027(a) (the "Removal Deadline"), from the current deadline of June 29, 2026, through and including

[1] The Wind-Down Debtor in this chapter 11 case, along with the last four digits of the Wind-Down Debtor's federal tax identification number, is: SunPower Corporation (8969) ("SunPower"). On February 18, 2025, the Court entered an order closing the chapter 11 cases of SunPower's debtor affiliates (collectively, the "Closing Debtors"). The Closing Debtors, along with the last four digits of the Closing Debtor's federal tax identification number, are: SunPower Corporation, Systems (8962); SunPower Capital, LLC (8450); SunPower Capital Services, LLC (9910); SunPower HoldCo, LLC (0454); SunPower North America, LLC (0194); Blue Raven Solar, LLC (3692); Blue Raven Solar Holdings, LLC (4577); BRS Field Ops, LLC (2370); and Falcon Acquisition HoldCo, Inc. (3335). The location of the Wind-Down Debtor's service address for purposes of this chapter 11 case is: 655 15th Street, NW, Suite 600, Washington, DC 20005, Attn: Mark Roberts, in his capacity as the Plan Administrator.

October 27, 2026. In support of this Motion, the Movants, by and through their respective undersigned counsel, respectfully represent as follows:

RELIEF REQUESTED

1. The Movants seek entry of the Proposed Order: (a) enlarging the Removal Deadline forth in rule 9027(a)(2)(A) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") during which the Creditor Trustee and/or Plan Administrator may seek removal of certain actions (collectively, the "Actions") pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 by 120 days, through and including **October 27, 2026**, without prejudice to the Creditor Trustee's and/or the Plan Administrator's right (either jointly or individually) to seek additional extensions of the Removal Deadline; and (b) granting related relief.

JURISDICTION AND VENUE

2. The United States District Court for the District of Delaware has jurisdiction over this matter 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 States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Movants confirm their consent, pursuant to rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), 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 in connection herewith consistent with Article III of the United States Constitution.

3. Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested herein are section 1452 of title 28 of the United States Code (the "Judicial Code"), Bankruptcy Rules 9006 and 9027, and Local Rule 9006-2.

BACKGROUND

5. On August 5, 2024 (the "Petition Date"), each of the above-captioned debtors (collectively, the "Debtors") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"). During the pendency of their chapter 11 cases (the "Chapter 11 Cases"), the Debtors operated their businesses and managed their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Chapter 11 Cases were consolidated for procedural purposes only and are being administered jointly. On August 16, 2024, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an official committee of unsecured creditors in the Chapter 11 Cases [D.I. 147]. No request for the appointment of a trustee or examiner has been made in the Chapter 11 Cases.

6. On October 18, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving the Debtors' Disclosure Statement for, and Confirming the Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtors Affiliates* [D.I. 872] (the "Confirmation Order") pursuant to which the Court confirmed the *Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates (Technical Modifications)*, filed October 17, 2024 [D.I. 829] (the "Plan"[2]). The Plan became effective in accordance with its terms on November 14, 2024 (the "Effective Date"). *See* D.I. 1058.

[2] Capitalized terms used, but not otherwise defined, in this Motion shall be ascribed the same meanings given to them in the Plan.

7. On the Effective Date, the Plan Administrator was appointed to wind-down the Debtors' estates. The Plan Administrator is empowered to, among other things, (i) resolve and object to, among other things, secured, administrative, and priority claims, and (ii) consummate the Wind-Down Transactions. Moreover, the Debtors have the authority to act through the Plan Administrator. *See* Plan Arts. IV.B, IV.F, VII.B.

8. Additionally, on the Effective Date, the Creditor Trust Agreement became effective pursuant to the terms of the Plan and Confirmation Order. *See* D.I. 1051-5 (Creditor Trust Agreement and Declaration of Creditor Trust).

9. The purpose of the Creditor Trust is "liquidating the Creditor Trust Assets, reconciling and objecting, if necessary, to disputed General Unsecured Claims, and distributing the Creditor Trust Net Assets to the Creditor Trust Beneficiaries in accordance with the terms of the Plan (including the Creditor Trust Recovery) and Creditor Trust Agreement." *See* Plan Art. X.B.

10. The Creditor Trust is responsible for administering claims and, "acting by and through the Trustee, shall have the exclusive right to object to the allowance of any such Claim on any ground, to file, withdraw, or litigate to judgment objections to such General Unsecured Claims, to settle or compromise any Disputed General Unsecured Claims without any further notice to or action, order or approval by the Bankruptcy Court, and to assert all defenses of the Debtors and their Estates." *See* Creditor Trust Agreement § 3.7.

11. The Confirmation Order provides that "all Causes of Action that a Debtor or an Estate may hold against any Person or Entity, whether arising before or after the Petition Date, and whether or not specifically enumerated in the Schedule of Retained Causes of Action, shall vest in the Creditor Trust or the Wind-Down Debtors, as applicable. The Creditor Trustee or the Plan

Administrator, as applicable, shall have the exclusive right, authority, and discretion to initiate, file, prosecute, enforce, abandon, settle, compromise, release, withdraw, or litigate to judgment such Causes of Action, as appropriate, in accordance with the best interests of the Creditor Trust and the Wind-Down Debtors, as applicable, and no preclusion doctrine, including the doctrines of res judicata, collateral estoppel, issue preclusion, claim preclusion, estoppel (judicial, equitable, or otherwise), or laches, shall apply to such Causes of Action upon, after, or as a consequence of the Confirmation or Consummation." *See* Confirmation Order ¶ 78.

12. The Confirmation Order also provides as follows: "The provisions governing the Creditor Trust set forth in Article X of the Plan are hereby approved in their entirety. The Creditor Trust has standing to pursue the Creditor Trust Claims on behalf of the Debtors." *Id.* ¶ 91.

THE ACTIONS

13. The Debtors are currently involved in a number of civil actions commenced prepetition in various forums. The Creditor Trustee and the Plan Administrator are reviewing the Debtors' books and records and are in the process of determining whether to remove any of the Actions to a district court pursuant to section 1452 of the Judicial Code. Since the Creditor Trust became effective, the Creditor Trustee has been working diligently on a number of critical matters pursuant to his duties as set forth in the Plan, the Confirmation Order, and the Creditor Trust Agreement. The Creditor Trustee has not yet decided which, if any, of the Actions he will seek to remove. Similarly, the Plan Administrator (who has been diligently addressing myriad workstreams in the Chapter 11 Cases since his appointment) has likewise not yet made any final determinations on whether or not to seek any of the Actions that remain within his purview under the Plan.

14. The Movants submit that an extension of the Removal Deadline is appropriate to provide the Creditor Trustee and/or the Plan Administrator sufficient time to make fully-informed decisions concerning the removal of any of the Actions.

15. The Movants also anticipate that they may become aware of Actions following the completion of their review and analysis of the many proofs of claim filed in the Chapter 11 Cases, at which point the Creditor Trustee and/or the Plan Administrator would also need to analyze such potential Actions to determine whether to remove any such Actions.

BASIS FOR RELIEF

16. Section 1452 of the Judicial Code and Bankruptcy Rule 9027 govern the removal of pending civil actions related to chapter 11 cases. Specifically, section 1452(a) of the Judicial Code provides:

> A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.

28 U.S.C. § 1452(a).

17. Bankruptcy Rule 9027 sets forth the time periods for filing notices to remove claims or causes of action. Specifically, Bankruptcy Rule 9027(a)(2) provides, in pertinent part:

> If the claim or cause of action in a civil action is pending when a case under the [Bankruptcy] Code is commenced, a notice of removal may be filed only within the longest of (A) 90 days after the order for relief in the case under the [Bankruptcy] Code, (B) 30 days after entry of an order terminating a stay, if the claim or cause of action in a civil action has been stayed under § 362 of the [Bankruptcy] Code, or (C) 30 days after a trustee qualifies in a chapter 11 reorganization case but not later than 180 days after the order for relief.

Fed. R. Bankr. P. 9027(a)(2).

18. Bankruptcy Rule 9006 permits the Court to extend the period to remove actions provided by Bankruptcy Rule 9027. Specifically, Bankruptcy Rule 9006(b)(1) provides, in pertinent part:

> [W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order . . . .

Fed. R. Bankr. P. 9006(b)(1).

19. It is well-settled that the Court is authorized to enlarge the Removal Deadline. *See Pacor, Inc. v. Higgins*, 743 F.2d 984, 996 n.17 (3d Cir. 1984) (holding that the bankruptcy court's power to grant an extension of the removal period pursuant to Bankruptcy Rule 9006(b) is "clear"), *overruled on other grounds by Things Remembered, Inc. v. Petrarca*, 516 U.S. 124, 134–35 (1995); *Caperton v. A.T. Massey Coal Co.*, 251 B.R. 322, 325 (S.D. W. Va. 2000) (stating that Bankruptcy Rule 9006 provides authority to enlarge time periods for removing actions under Bankruptcy Rule 9027); *In re Jandous Elec. Constr. Corp.*, 106 B.R. 48, 50 (Bankr. S.D.N.Y. 1989) (finding that the period in which to file a motion to remove may be expanded pursuant to Bankruptcy Rule 9006); *In re World Fin. Servs. Ctr., Inc.*, 81 B.R. 33, 39 (Bankr. S.D. Cal. 1987) (finding that the United States Supreme Court intended to give bankruptcy judges the power to enlarge the filing periods under Bankruptcy Rule 9027(a) pursuant to Bankruptcy Rule 9006(b)); *Raff v. Gordon*, 58 B.R. 988, 990 (E.D. Pa. 1986) (finding that an expansion of time to file notices of removal is authorized under the Bankruptcy Rules).

20. The Removal Deadline was originally set to expire on November 4, 2024. On November 15, 2024, the Court entered an order [D.I. 1059] extending the Removal Deadline

through and including March 4, 2025, without prejudice to the Debtors' right to seek further extensions.

21. On March 24, 2025, the Court entered an order [D.I. 1412] extending the Removal Deadline through and including July 2, 2025, without prejudice to the Creditor Trustee's and/or the Plan Administrator's right to seek further extensions.

22. Thereafter, on July 16, 2025, the Court entered an order [D.I. 1576] extending the Removal Deadline through and including October 30, 2025, without prejudice to the Creditor Trustee's and/or the Plan Administrator's right to seek further extensions.

23. Then, on November 19, 2025, the Court entered an order [D.I. 1698] extending the Removal Deadline through and including February 27, 2026, without prejudice to the Creditor Trustee's and/or the Plan Administrator's right to seek further extensions.

24. Most recently, on March 18, 2026, the Court entered an order [D.I. 1797] extending the Removal Deadline through and including June 29, 2026, without prejudice to the Creditor Trustee's and/or the Plan Administrator's right to seek further extensions.

25. By this Motion, the Movants seek a further extension of the Removal Deadline through and including **October 27, 2026** to ensure that the Creditor Trustee's and/or the Plan Administrator's right to remove Actions is preserved and that creditors are on notice of such extended removal deadline.[3]

26. The Movants' decision regarding whether to seek removal of any particular Action depends on a number of factors, including: (a) the importance of the Action to the expeditious resolution of the Chapter 11 Cases; (b) the time required to complete the Action in its current

[3] Pursuant to Local Rule 9006-2, the filing of this Motion prior to the current deadline shall serve automatically to extend the current deadline without the necessity for the entry of a bridge order until the Court rules on this Motion. *See* Del. Bankr. L.R. 9006-2.

venue; (c) the presence of federal subject matter jurisdiction in the proceeding that may allow for one or more aspects thereof to be heard by a federal court; (d) the relationship between the Action and matters to be considered in connection with the Debtors' bankruptcy process, the Plan, the claims allowance process, and the assumption or rejection of executory contracts and unexpired leases; and (e) the progress made to date in the Action. To make the appropriate determination, the Movants must analyze each Action in light of such factors.

27. To date, the Movants' review of the Debtors' books and records to determine whether any additional Actions exist remains ongoing. The Movants believe that the extension requested herein will provide the Creditor Trustee and/or the Plan Administrator with the ability to make more fully-informed decisions concerning the removal of any of the Actions and will ensure that the Creditor Trustee's and/or the Plan Administrator's rights provided by section 1452 of the Judicial Code can be exercised in an appropriate manner. Alternately, if such an extension is not granted, the Creditor Trustee and/or the Plan Administrator may not become aware of certain Actions until after the Removal Deadline expires.

28. Moreover, the rights of parties to the Actions will not be unduly prejudiced by a further extension of the Removal Deadline. If the Creditor Trustee and/or the Plan Administrator ultimately seeks to remove Actions pursuant to Bankruptcy Rule 9027, parties will retain their rights to have such Actions remanded pursuant to section 1452(b) of the Judicial Code. Accordingly, the Movants submit that cause exists for the relief requested herein.

PRIOR REQUESTS

29. This is the sixth request to extend the Removal Deadline in the Chapter 11 Cases. On November 15, 2024, the Court entered an order on motion of the Debtors extending the Removal Deadline through and including March 4, 2025. *See* D.I. 1059. On March 24, 2025, the Court entered an order on motion of the Creditor Trustee further extending the Removal Deadline

though and including July 2, 2025. *See* D.I. 1412. Thereafter, on July 16, 2025, the Court entered an order on motion of the Creditor Trustee further extending the Removal Deadline though and including October 30, 2025. *See* D.I. 1576. On November 19, 2025, the Court entered an order on motion of the Movants further extending the Removal Deadline through and including February 27, 2026. Most recently, on March 18, 2026, the Court entered an order on motion of the Movants further extending the Removal Deadline through and including June 29, 2026.

NOTICE

30. The Movants shall provide notice of this Motion on the date hereof to (a) U.S. Trustee, and (b) any other party entitled to receive notice pursuant to Bankruptcy Rule 2002 and Local Rule 2002-1(b). The Movants respectfully submit that no further notice of this Motion need be provided.

WHEREFORE, the Movants respectfully request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein without prejudice to the rights of the Movants (either jointly or individually), as applicable, to seek additional extensions of such deadline as appropriate and such other and further relief as the Court deems just and proper.

Dated: June 29, 2026
Wilmington, Delaware

/s/ Zachary J. Javorsky
RICHARDS, LAYTON & FINGER, P.A.
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Attorneys for the Creditor Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
SUNPOWER CORPORATION, *et al.*,[1]	)	Case No. 24-11649 (CTG)
Wind-Down Debtor.	)	(Jointly Administered)
	)	**Hearing Date: July 21, 2026 at 10:00 a.m.** **Objection Deadline: July 13, 2026 at 4:00 p.m.**

NOTICE OF "JOINT MOTION OF THE PLAN ADMINISTRATOR AND THE CREDITOR TRUSTEE FOR ENTRY OF AN ORDER FURTHER ENLARGING THE PERIOD WITHIN WHICH THE PLAN ADMINISTRATOR AND/OR THE CREDITOR TRUSTEE MAY REMOVE ACTIONS" AND HEARING THEREON

PLEASE TAKE NOTICE that, on June 29, 2026, Mark Roberts, solely in his capacity as the plan administrator for the Debtors' wind-down estates (the "Plan Administrator") and Steven Balasiano, by and through MHR Advisory Group, LLC, in its capacity as the Creditor Trustee (the "Creditor Trustee" and, together with the Plan Administrator, the "Movants"), filed the *Joint Motion of the Plan Administrator and the Creditor Trustee For Entry of An Order Further Enlarging the Period Within Which the Plan Administrator and/or the Creditor Trustee May Remove Actions* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

[1] The Wind-Down Debtor in this chapter 11 case, along with the last four digits of the Wind-Down Debtor's federal tax identification number, is: SunPower Corporation (8969) ("SunPower"). On February 18, 2025, the Court entered an order closing the chapter 11 cases of SunPower's debtor affiliates (collectively, the "Closing Debtors"). The Closing Debtors, along with the last four digits of the Closing Debtor's federal tax identification number, are: SunPower Corporation, Systems (8962); SunPower Capital, LLC (8450); SunPower Capital Services, LLC (9910); SunPower HoldCo, LLC (0454); SunPower North America, LLC (0194); Blue Raven Solar, LLC (3692); Blue Raven Solar Holdings, LLC (4577); BRS Field Ops, LLC (2370); and Falcon Acquisition HoldCo, Inc. (3335). The location of the Wind-Down Debtor's service address for purposes of this chapter 11 case is: 655 15th Street, NW, Suite 600, Washington, DC 20005, Attn: Mark Roberts, in his capacity as the Plan Administrator.

PLEASE TAKE FURTHER NOTICE that, any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **July 13, 2026 at 4:00 p.m. (Eastern Daylight Time)**.

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before The Honorable Craig T. Goldblatt, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 3rd Floor, Courtroom 7, Wilmington, Delaware 19801 on **July 21, 2026 starting at 10:00 a.m. (Eastern Daylight Time)**.

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION BY THE MOVANTS WITHOUT FURTHER NOTICE OR HEARING.

[*Remainder of page intentionally left blank.*]

Dated: June 29, 2026
Wilmington, Delaware

/s/ Zachary J. Javorsky
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Attorneys for the Creditor Trustee

<u>Exhibit A</u>

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
SUNPOWER CORPORATION, *et al.*,[1]	)	Case No. 24-11649 (CTG)
Wind-Down Debtor.	)	(Jointly Administered)

ORDER FURTHER ENLARGING THE PERIOD WITHIN WHICH THE CREDITOR TRUSTEE AND/OR THE PLAN ADMINISTRATOR MAY REMOVE ACTIONS

Upon the motion, dated June 29, 2026 (the "Motion")[2] of Mark Roberts, solely in his capacity as the plan administrator for the Debtors' wind-down estates (the "Plan Administrator") and Steven Balasiano, by and through MHR Advisory Group, LLC, in its capacity as the Creditor Trustee (the "Creditor Trustee" and, together with the Plan Administrator, the "Movants") of the SunPower Creditor Trust pursuant to the Plan and Confirmation Order in the Chapter 11 Cases, for entry of an order (this "Order"): (a) further enlarging the Removal Deadline by 120 days, through and including **October 27, 2026**, without prejudice to the Creditor Trustee's and/or Plan Administrator's right to seek further extensions; and (b) granting related relief, all as more fully set forth in the Motion; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under

[1] The Wind-Down Debtor in this chapter 11 case, along with the last four digits of the Wind-Down Debtor's federal tax identification number, is: SunPower Corporation (8969) ("SunPower"). On February 18, 2025, the Court entered an order closing the chapter 11 cases of SunPower's debtor affiliates (collectively, the "Closing Debtors"). The Closing Debtors, along with the last four digits of the Closing Debtor's federal tax identification number, are: SunPower Corporation, Systems (8962); SunPower Capital, LLC (8450); SunPower Capital Services, LLC (9910); SunPower HoldCo, LLC (0454); SunPower North America, LLC (0194); Blue Raven Solar, LLC (3692); Blue Raven Solar Holdings, LLC (4577); BRS Field Ops, LLC (2370); and Falcon Acquisition HoldCo, Inc. (3335). The location of the Wind-Down Debtor's service address for purposes of this chapter 11 case is: 655 15th Street, NW, Suite 600, Washington, DC 20005, Attn: Mark Roberts, in his capacity as the Plan Administrator.

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

28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the Movants' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and the Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having reviewed the Motion and having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED, as set forth herein.

2. The period within which the Creditor Trustee and/or Plan Administrator may seek removal of the Actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 (*i.e.*, the Removal Deadline) is hereby further enlarged, with a deadline for filing notices of removal of **October 27, 2026**.

3. This Order is without prejudice to the Creditor Trustee's and/or Plan Administrator's right (either jointly or individually) to request a further extension of time to file notices of removal of any or all of the Actions.

4. This Order shall be without prejudice to any position the Creditor Trustee and/or Plan Administrator may take regarding whether section 362 of the Bankruptcy Code applies to stay any Action.

5. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

7. The Creditor Trustee and Plan Administrator are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.