

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

In re:

BY HOTEL SPE-3 LLC, a Delaware Limited
Liability Company,

Debtor.

Tax I.D. No. 84-2363619

Chapter 11

Case No. 26-10324

In re:

WABASH 11TH MEZZ LLC, a Delaware
Limited Liability Company,

Debtor.

Tax I.D. No. 84-2374278

Chapter 11

Case No. 26-10326

In re:

PACIFIC TAI MEZZ LLC, a Delaware Limited
Liability Company,

Debtor.

Tax I.D. No. 84-2363717

Chapter 11

Case No. 26-10327

In re:

1101 WABASH DEVELOPMENT MEZZ,
LLC, a Delaware Limited Liability Company,

Debtor.

Tax I.D. No. 84-2399294

Chapter 11

Case No. 26-10325

In re:

1101 WABASH DEVELOPMENT SPE LLC, a
Delaware Limited Liability Company,

Debtor.

Tax I.D. No. 84-2399201

Chapter 11

Case No. 26-10328

In re:

WABASH 11TH LLC, an Illinois Limited
Liability Company,

Debtor.

Tax I.D. No. 47-2793098

Chapter 11

Case No. 26-10329

In re:

1101 WABASH DEVELOPMENT, LLC an
Illinois Limited Liability Company,

Debtor.

Tax I.D. No. 81-1643365

Chapter 11

Case No. 26-10330

In re:

PACIFIC TAI, LLC, an Illinois Limited
Liability Company,

Debtor.

Tax I.D. No.36-4179675

Chapter 11

Case No. 26-10331

In re:

SB YEN'S MANAGEMENT GROUP, INC.,
an Illinois Corporation,

Debtor.

Tax I.D. No. 36-3881132

Chapter 11

Case No. 26-10332

**DEBTORS' MOTION FOR ORDER DIRECTING JOINT ADMINISTRATION OF
RELATED CHAPTER 11 CASES FOR PROCEDURAL PURPOSES ONLY**

The above-captioned debtors and debtors in possession (collectively, the “Debtors” file this motion for the entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), pursuant to Rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), authorizing and directing the joint administration of the Debtors’ related chapter 11 cases (the “Chapter 11 Cases”) for procedural purposes only. In support of this Motion, the Debtors rely upon and refer this Court to the *Declaration of Su-Mei Yen in Support of Debtors’ First Day, Cash Collateral, and Debtor in Possession Financing Motions* (the “First Day Declaration”), incorporated herein by reference. In further support of this Motion, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334 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 Court may enter a final order consistent with Article III of the United States Constitution. The Debtors confirm their consent, pursuant to Rule 9013-1(f) of 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.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), Bankruptcy Rule 1015(b), and Local Rule 1015-1.

GENERAL BACKGROUND

4. On the date hereof (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases, and no committees have been appointed or designated.

5. A detailed description of the Debtors’ business and facts precipitating the filing of the Debtors’ chapter 11 proceedings are set forth in the First Day Declaration.

RELIEF REQUESTED

6. By this Motion, the Debtors seek entry of an order authorizing and directing the joint administration of the Chapter 11 Cases and the consolidation thereof for procedural purposes only. The Debtors also request that the caption of the Chapter 11 Cases be modified to reflect their joint administration as follows:

[Remainder of Page Intentionally Left Blank.]

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

In re:

BY HOTEL SPE-3 LLC, a Delaware Limited Liability Company, 1101 WABASH DEVELOPMENT MEZZ, LLC, a Delaware Limited Liability Company, WABASH 11TH MEZZ LLC, a Delaware Limited Liability Company, PACIFIC TAI MEZZ LLC, a Delaware Limited Liability Company, 1101 WABASH DEVELOPMENT SPE LLC, a Delaware Limited Liability Company, WABASH 11TH LLC, an Illinois Limited Liability Company, 1101 WABASH DEVELOPMENT LLC, an Illinois Limited Liability Company, PACIFIC TAI, LLC, an Illinois Limited Liability Company, SB YEN'S MANAGEMENT GROUP, INC, an Illinois Corporation,

Debtors.¹

Chapter 11

Case No. 26-10324

(Jointly Administered)

¹The Debtors in these chapter 11 cases and the last four digits of their respective identification numbers are By Hotel SPE-3 LLC (3619); Wabash 11th Mezz LLC (4278); Pacific Tai Mezz LLC (3717); 1101 Wabash Development Mezz, LLC (9294); 1101 Wabash Development SPE LLC (9201); Wabash 11th LLC (3098); 1101 Wabash Development LLC (3365); Pacific Tai, LLC (9675); and SB Yen's Management Group, Inc. (1132). The location of the Debtors' corporate headquarters and the Debtors' service address is 806 N York Rd., Hinsdale, IL 60521.

7. In addition, the Debtors request that the Court direct the Clerk of this Court (the "Clerk") to make a notation substantially similar to the following on the docket of each Debtor:

An order (the "Joint Administration Order") has been entered in this case directing the joint administration of the chapter 11 cases listed below for procedural purposes only. The docket in Case No. 26-10324 should be consulted for all matters affecting these cases, and all further pleadings and other papers shall be filed in and all further docket entries shall be made in such case. The following chapter 11 cases are jointly administered pursuant to the Joint Administration Order: By Hotel SPE-3 LLC, Case No. 26-10324; Wabash 11th Mezz LLC, Case No. 26-10326; Pacific Tai Mezz LLC, Case No. 26-10327; 1101 Wabash Development Mezz, LLC, Case No. 26-10325; 1101 Wabash Development SPE LLC, Case No. 26-10328; Wabash 11th LLC, Case No. 26-10329; 1101 Wabash Development LLC, Case No. 26-10330; Pacific Tai, LLC, Case No. 26-10331; SB Yen's Management Group, Inc., Case No. 26-10332.

8. Finally, the Debtors also request that the court permit use of a combined service list and correspondingly combined notices.

BASIS FOR RELIEF

9. Bankruptcy Rule 1015(b) provides, in relevant part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b). The Debtors are “affiliates” of each other as that term is defined in section 101(2) of the Bankruptcy Code. Thus the Court is authorized to consolidate the Debtors’ cases for procedural purposes.

10. Local Rule 1015-1 provides additional authority for the Court to order joint administration of the Chapter 11 Cases:

The Court may order joint administration of related cases pending in this Court without notice and an opportunity for hearing on a motion supported by an affidavit, declaration, or verification establishing that joint administration of the cases is warranted and will ease the administrative burden for the Court and the parties. A joint administration order entered under this Local Rule (i) is procedural only and does not substantively consolidate the debtors’ estates and (ii) may be reconsidered on motion of a party in interest at any time.

Del. Bankr. L.R. 1015-1.

11. The First Day Declaration establishes that joint administration of the Debtors’ cases is warranted because it will ease the administrative burden on the Court and all parties in interest. Joint administration of the Debtors’ cases will eliminate the need for duplicate pleadings, notices, and orders on each of the respective dockets and will save the Court, the Debtors, and other parties in interest substantial time and expense when preparing and filing such documents. Further, joint administration will protect parties in interest by ensuring that they will be apprised of the various motions filed with the Court with respect to each of the Debtors’ cases. Therefore, joint

administration of the Debtors' cases is appropriate under Bankruptcy Rule 1015(b) and Local Rule 1015-1.

12. Joint administration will not adversely affect the Debtors' respective constituencies because this Motion seeks only procedural and not substantive consolidation of the Debtors' estates. Parties in interest will not be harmed by the relief requested. Instead, parties in interest will benefit from the cost reductions associated with the joint administration of the Chapter 11 Cases. Accordingly, the Debtors submit that the joint administration of the Chapter 11 Cases is in the best interests of their estates, their creditors, and all other parties in interest.

13. Finally, the Debtors submit that use of the simplified caption, without reference to the Debtors' full tax identification numbers, addresses, and previous names, will eliminate cumbersome and confusing procedures and ensure uniformity of pleading identification. Other case-specific information will be listed in the petitions for the respective Debtors, and such petitions are publicly available and will be provided by the Debtors upon request. Therefore, the Debtors submit that the policies behind the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n) have been fully satisfied.²

NOTICE

14. The Debtors will provide notice of this Motion to: (a) the Office of the U.S. Trustee for the District of Delaware; (b) the holders of the 20 largest unsecured claims against the Debtors (on a consolidated basis); (c) counsel to the Debtors' secured creditors; (d) the United States Attorney's Office for the District of Delaware; (e) the state attorneys general for all states in which the Debtors conduct business; and (f) any party that requests service pursuant to Bankruptcy Rule 2002. As this Motion is seeking "first day" relief, within two business days of the hearing on

the Motion, the Debtors will serve copies of the Motion and any order entered in respect to this Motion as required by Local Rule 9013-1(m).

NO PRIOR REQUEST

15. No prior request for the relief sought in this Motion has been made to this Court or any other court.

CONCLUSION

WHEREFORE, the Debtors respectfully request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**: (a) authorizing and directing the joint administration of the Debtors' cases for procedural purposes only; (b) directing the Clerk to make the docket entries set forth herein; and (c) granting such other and further relief as is just and proper.

Dated: March 8, 2026
Wilmington, DE

LEWIS BRISBOIS
BISGAARD & SMITH LLP

By: /s/ Rafael X. Zahralddin-Aravena
Rafael X. Zahralddin-Aravena (No. 004166)
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*Proposed Attorneys for the Debtors and the
Debtors in Possession.*

EXHIBIT A

(Proposed form of Order)

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

In re:

BY HOTEL SPE-3 LLC, a Delaware Limited
Liability Company,

Debtor.

Tax I.D. No. 84-2363619

Chapter 11

Case No. 26-10324

In re:

WABASH 11TH MEZZ LLC, a Delaware
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Chapter 11

Case No. 26-10331

In re:

SB YEN'S MANAGEMENT GROUP, INC.,
an Illinois Corporation,

Debtor.

Tax I.D. No. 36-3881132

Chapter 11

Case No. 26-10332

**ORDER AUTHORIZING JOINT ADMINISTRATION
OF RELATED CHAPTER 11 CASES FOR PROCEDURAL PURPOSES ONLY**

Upon consideration of the motion of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), for the entry of an order pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1 authorizing and directing the joint administration of the Debtors’ related chapter 11 cases for procedural purposes only, all as more fully set forth in the Motion; and upon consideration of the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and this 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 this Court having found that the Debtors’ 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 this Court having reviewed the Motion; 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 upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is hereby GRANTED as set forth herein.
2. The above-captioned chapter 11 cases are hereby consolidated for procedural purposes only and shall be jointly administered by the Court. Nothing contained in this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of the above-captioned cases, and this Order shall be without prejudice to the Debtors’ rights to seek entry of an order substantively consolidating their respective cases.

3. The caption of the jointly administered cases shall read as follows:

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

In re:

BY HOTEL SPE-3 LLC, a Delaware Limited Liability Company, 1101 WABASH DEVELOPMENT MEZZ, LLC, a Delaware Limited Liability Company, WABASH 11TH MEZZ LLC, a Delaware Limited Liability Company, PACIFIC TAI MEZZ LLC, a Delaware Limited Liability Company, 1101 WABASH DEVELOPMENT SPE LLC, a Delaware Limited Liability Company, WABASH 11TH LLC, an Illinois Limited Liability Company, 1101 WABASH DEVELOPMENT LLC, an Illinois Limited Liability Company, PACIFIC TAI, LLC, an Illinois Limited Liability Company, SB YEN'S MANAGEMENT GROUP, INC, an Illinois Corporation,

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4. The Clerk is directed to make a notation substantially similar to the following on the docket of each Debtor:

An order (the "Joint Administration Order") has been entered in this case directing the joint administration of the chapter 11 cases listed below for procedural purposes only. The docket in Case No. 26-10324 should be consulted for all matters affecting these cases, and all further pleadings and other papers shall be filed in and all further docket entries shall be made in such case. The following chapter 11 cases are jointly administered pursuant to the Joint Administration Order: By Hotel SPE-3 LLC, Case No. 26-10324; Wabash 11th Mezz LLC, Case No. 26-10326; Pacific Tai Mezz LLC,

Case No. 26-10327; 1101 Wabash Development Mezz, LLC, Case No. 26-10325; 1101 Wabash Development SPE LLC, Case No. 26-10328; Wabash 11th LLC, Case No. 26-10329; 1101 Wabash Development LLC, Case No. 26-10330; Pacific Tai, LLC, Case No. 26-10331; SB Yen's Management Group, Inc., Case No. 26-10332.

5. The caption set forth above shall be deemed to satisfy any applicable requirements of the first sentence of section 342(c) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n).

6. All pleadings and other documents to be filed in the jointly-administered caess shall be filed and docketed in the case of By Hotel SPE-3 LLC, Case No. 26-10324.

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. This Order shall take effect immediately upon entry.

9. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: March ____, 2026
Wilmington, DE

UNITED STATES BANKRUPTCY JUDGE