

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re: § Chapter 11
A’GACI, L.L.C., §
Debtor. § Case No. 18-50049-rbk-11
§
§

**AGENDA
OF MATTERS SCHEDULED FOR HEARING
July 26, 2018**

Matters Set for 2:00 p.m.

UNCONTESTED MATTERS

A. MOTION TO ASSUME QBE CONTRACT

Debtor’s Expedited Motion Under Bankruptcy Code Section 365 and Bankruptcy Rule 6006 to Approve Assumption of Insurance Policy with QBE International Insurance Limited [Docket No. 431]

Response Deadline: Prior to hearing

Status: **Going forward**

Related Matters:

1. Request for Expedited Hearing on Debtor’s Expedited Motion Under Bankruptcy Code Section 365 and Bankruptcy Rule 6006 to Approve Assumption of Insurance Policy with QBE International Insurance Limited [Docket No. 432]
2. Notice of Expedited Hearing [Docket No. 433]
3. Notice of Filing of Correction to Notice of Cure Procedures [Docket No. 430]
4. Order Granting Request for Expedited Hearing on Debtor’s Expedited Motion Under Bankruptcy Code Section 365 and Bankruptcy Rule 6006 to Approve Assumption of Insurance Policy with QBE International Insurance Limited [Docket No. 434]
5. Corrected Certificate of Conference on Debtor’s Expedited Motion Under Bankruptcy Code Section 365 and Bankruptcy Rule 6006 to Approve Assumption of Insurance Policy with QBE International Insurance Limited [Docket No. 440]
6. Debtor’s Witness and Exhibit List for July 26, 2018 Hearing [Docket No. 461]



B. MOTION TO APPROVE AGREEMENT WITH NETWORK TECH PROPERTY

Debtor's Expedited Motion Pursuant to Bankruptcy Code Sections 105 and 365 and Bankruptcy Rules 6006 and 9019 for Authority to Enter Into, and Perform Under Agreement with Network Tech Property LLC [Docket No. 442]

Response Deadline: Prior to hearing

Status: **Going forward**

Related Matters:

1. Request for Expedited Hearing Debtor's Expedited Motion Pursuant to Bankruptcy Code Sections 105 and 365 and Bankruptcy Rules 6006 and 9019 for Authority to Enter Into, and Perform Under Agreement with Network Tech Property LLC [Docket No. 443]
2. Order Granting Request for Expedited Hearing on Debtor's Expedited Motion Pursuant to Bankruptcy Code Sections 105 and 365 and Bankruptcy Rules 6006 and 9019 for Authority to Enter Into, and Perform Under Agreement with Network Tech Property LLC [Docket No. 444]
3. Notice of Expedited Hearing [Docket No. 445]
4. Debtor's Witness and Exhibit List for July 26, 2018 Hearing [Docket No. 461]

C. BANK OF AMERICA MOTIONS TO AMEND PROOF OF CLAIM

Bank of America's Expedited Motion to Amend Proof of Claim and to Establish its Claims for Voting Purposes [Docket No. 419]

and

Bank of America's Expedited Motion for Relief From stay to Amend Proof of Claim and to Establish its Claims for Voting Purposes and Related Relief [Docket No. 420]

Response Deadline: Prior to hearing

Status: **Going forward**

Related Matters:

1. Motion to Expedite Hearing on Bank of America's Expedited Motion to Amend Proof of Claim and to Establish its Claims for Voting Purposes and Bank of America's Expedited Motion for Relief From stay to Amend Proof of Claim and to Establish its Claims for Voting Purposes and Related Relief [Docket No. 421]

2. Notice of Hearing [Docket No. 423]
3. Order Granting Motion to Expedite Hearing on Bank of America's Expedited Motion to Amend Proof of Claim and to Establish its Claims for Voting Purposes and Bank of America's Expedited Motion for Relief From stay to Amend Proof of Claim and to Establish its Claims for Voting Purposes and Related Relief [Docket No. 424]
4. Stipulation Between Bank of America and A'GACI, L.L.C. Regarding Certain Plan-Related Deadlines [Docket No. 426]
5. Bank of America, N.A.'s Exhibit List for July 18, 2018 Hearings [Docket No. 435]
6. Stipulation Between Bank of America and A'GACI, L.L.C. Regarding Certain Plan-Related Deadlines [Docket No. 459]
7. Motion to Continue Hearings Set for July 23, 2018 [Docket No. 466]
8. Order Granting Bank of America's Motion to Continue Certain Hearings Set for July 23, 2018 [Docket No. 467]
9. Notice of Continued Hearings [Docket No. 468]

D. EMERGENCY MOTION TO APPROVE SETTLEMENT AGREEMENT

Debtor's Emergency Motion Pursuant to Bankruptcy Code Sections 105 and 365 and Bankruptcy Rules 6006 and 9019 for Authority to Enter Into, and Perform Under Agreement With Bank of America, N.A. and US Real Estate Limited Partnership [Docket No. 472]

Response Deadline: Prior to hearing

Status: **Going forward**

Related Matters:

1. Motion for an Emergency Hearing on Debtor's Emergency Motion Pursuant to Bankruptcy Code Sections 105 and 365 and Bankruptcy Rules 6006 and 9019 for Authority to Enter Into, and Perform Under Agreement With Bank of America, N.A. and US Real Estate Limited Partnership [Docket No. 473]
2. Notice of Emergency Hearing [Docket No. 474]
3. Order Granting Motion for an Emergency Hearing on Debtor's Emergency Motion Pursuant to Bankruptcy Code Sections 105 and 365 and Bankruptcy Rules 6006 and 9019 for Authority to Enter Into, and Perform Under Agreement With Bank of America, N.A. and US Real Estate Limited Partnership [Docket No. ____]

CONTESTED MATTERS

E. CONFIRMATION OF PLAN

First Amended Plan of Reorganization of A’GACI, L.L.C. Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 378]

Response Deadline: July 16, 2018 @ 4:00 p.m. Central Time; extended for Bank of America to July 24, 2018

Status: **Going forward**

Related Matters:

1. Order (I) Approving the Disclosure Statement; (II) Fixing a Record Date; (III) Approving Cure Procedures; (IV) Approving Solicitation Procedures; (V) Approving Form of Ballot and Establishing Voting Procedures; and (VI) Establishing Notice and objection Procedures With Respect to Confirmation of the Plan of Reorganization of A’GACI, L.L.C. Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 396]
2. Notice of (I) Approval of Disclosure Statement; (II) Establishment of Voting Record Date; (III) Approval of Cure Procedures; (IV) Hearing on Confirmation of the Chapter 11 Plan of the Debtor; (V) Procedures for Objecting to Confirmation of the Plan; and (VI) Procedures and Deadline for Voting on the Plan [Docket No. 400]
3. Notice of Publication [Docket No. 404]
4. Notice of Cure Procedures [Docket No. 413]
5. Stipulation Between Bank of America and A’GACI, L.L.C. Regarding Certain Plan-Related Deadlines [Docket No. 426]
6. Notice of Filing of Correction to Notice of Cure Procedures [Docket No. 430]
7. Notice of Filing of Plan Supplement [Docket No. 439]
8. CBL & Associates Management, Inc.’s Limited Objection to Debtor’s Cure Notice [Docket No. 446] (*resolved*)
9. Objection to Debtor’s Proposed Cure Amounts by Plaza Las Americas, Inc. and Plaza Del Caribe, S.C. [Docket No. 447] (*see Docket No. 449*)
10. Limited Objection of Starwood Retail Partners LLC, The Macerich Company, and YTC Mall Owner, LLC to Debtor’s Notice of Cure Procedures [Docket No. 448] (*resolved*)
11. Amended Objection to Debtor’s Proposed Cure Amounts by Plaza Las Americas, Inc. and Plaza Del Caribe, S.C. [Docket No. 449]

12. Oracle America, Inc.'s Limited Objection to and Reservation of Rights Regarding (I) First Amended Plan of Reorganization of A'GACI, L.L.C. Pursuant to Chapter 11 of the Bankruptcy Code; and (2) Notice of Cure Procedures [Docket No. 452]
13. Objection of Washington Prime Group Inc. to the Cure Amounts Proposed by the Debtor in the Notice of Cure Procedures [Docket No. 453]
14. Stipulation Between Bank of America and A'GACI, L.L.C. Regarding Certain Plan-Related Deadlines [Docket No. 459]
15. Exhibit and Witness List of Oracle America, Inc. [Docket No. 460]
16. Debtor's Witness and Exhibit List for July 26, 2018 Hearing [Docket No. 461]
17. Declaration of Michael J. Paque with Respect to the Tabulation of Votes on the First Amended Plan of Reorganization of A'GACI, L.L.C. Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 462]
18. Brief in Support of Confirmation of the First Amended Plan of Reorganization of A'GACI, L.L.C. Pursuant to Chapter 11 of the United States Bankruptcy Code [Docket No. 465]
19. Notice of Filing of Certain Amended Plan Supplement Documents [469]
20. Bank of America's Conditional Objection to Confirmation of the Plan of Reorganization of A'GACI, L.L.C. [Docket No. 475] (*resolved if Settlement Agreement approved*)
21. Declaration of David Won in Support of Confirmation of the Second Amended Plan of Reorganization of A'GACI, L.L.C. Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 476]
22. Declaration of Stephen Coulombe in Support of Confirmation of the Second Amended Plan of Reorganization of A'GACI, L.L.C. Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 477]
23. Declaration of Teresa C. Kohl in Support of Confirmation of the Second Amended Plan of Reorganization of A'GACI, L.L.C. Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 478]
24. Notice of Filing of Proposed Confirmation Order [Docket No. 479]
25. Notice of Filing of Redline of Draft Second Amended Plan of Reorganization [Docket No. 480]

RESPECTFULLY SUBMITTED this 25th day of July, 2018.

HAYNES AND BOONE, LLP

By: /s/ Ian T. Peck

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