

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

|   |   |                                  |
|---|---|----------------------------------|
|   | ) |                                  |
| In re:  | ) | Chapter 11                       |
|   | ) |                                  |
| TZEW HOLDCO LLC, <i>et al.</i> , <sup>1</sup> | ) | Case No. 20-10910 (CSS)          |
|   | ) |                                  |
| Debtors.                                      | ) | (Joint Administration Requested) |
|   | ) |                                  |

**NOTICE OF AGENDA FOR TELEPHONIC HEARING ON FIRST DAY MOTIONS  
SCHEDULED FOR APRIL 14, 2020 AT 12:00 P.M. (PREVAILING EASTERN TIME),  
BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI BANKRUPTCY JUDGE,  
AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF  
DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 5th FLOOR,  
COURTROOM NO. 6, WILMINGTON, DELAWARE 19801**

**ANY PARTY WISHING TO PARTICIPATE IN THE HEARING  
MUST APPEAR THROUGH BOTH COURTCALL AND ZOOM.**

**TO APPEAR BY VIDEO CONFERENCE VIA ZOOM,  
PARTIES SHOULD USE THE FOLLOWING INSTRUCTIONS:**

**Join Zoom Hearing: <https://uchicago.zoom.us/j/745010319>**

**Meeting ID: 745 010 319**

**TO APPEAR TELEPHONICALLY VIA COURTCALL, PARTIES MUST MAKE PRIOR  
ARRANGEMENTS WITH COURTCALL BY  
TELEPHONE (866-582-6878) OR FACSIMILE (866-533-2946)**

<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: Apex Parks Group, LLC (5579); Apex Real Property Holdings, LLC (1013); Speedzone Beverage Company, LLC (2339); Speedzone Holdings, LLC (7913); Speedzone Management, LLC (2937); TZEW Holdco LLC (0252); and TZEW Intermediate Corp. (1058). The location of the Debtors’ service address in these chapter 11 cases is: 18575 Jamboree Road, Suite 600, Irvine, CA 92612.



**This agenda sets forth items in the order they appear in the first day motions binders delivered to the Court. The status of each is set forth below.**

1. Petition Packages:

- a) TZEW Holdco LLC [Filed: 4/8/20] (Case No. 20-10910, [Docket No. 1](#))
- b) TZEW Intermediate Corp. [Filed: 4/8/20] (Case No. 20-10916, [Docket No. 1](#))
- c) Apex Parks Group, LLC [Filed: 4/8/20] (Case No. 20-10911, [Docket No. 1](#))
- d) Apex Real Property Holdings, LLC [Filed: 4/8/20] (Case No. 20-10912, [Docket No. 1](#))
- e) Speedzone Management, LLC [Filed: 4/8/20] (Case No. 20-10915, [Docket No. 1](#))
- f) Speedzone Holdings, LLC [Filed: 4/8/20] (Case No. 20-10914, [Docket No. 1](#))
- g) Speedzone Beverage Company, LLC [Filed: 4/8/20] (Case No. 20-10913, [Docket No. 1](#))

2. Declaration of Scott Avila, Chief Restructuring Officer of the Debtors, in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Filed: 4/13/20] ([Docket No. 16](#)).

**Status:** The Declaration will be relied upon as evidentiary support for the first day matters listed below.

**First Day Administrative and Procedural Motions**

3. Debtors' Motion Seeking Entry of an Order (I) Directing Joint Administration of Their Related Chapter 11 Cases and (II) Granting Related Relief [Filed: 4/8/20] ([Docket No. 2](#)).

**Status:** This matter is going forward.

4. Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants LLC as Claims and Noticing Agent Effective as of the Petition Date [Filed: 4/13/20] ([Docket No. 17](#)).

**Status:** This matter is going forward.

5. Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to (A) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (B) File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors in Lieu of Filing Lists for each Debtor, and (C) Redact Certain Personally Identifiable

Information for the Debtors' Individual Creditors and Interest Holders, and (II) Granting Related Relief [Filed: 4/13/20] ([Docket No. 18](#)).

**Status:** This matter is going forward.

**First Day Motions Pertaining to Business Operations**

6. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 4/13/20] ([Docket No. 19](#)).

**Status:** This matter is going forward with respect to an interim order.

7. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Honor Certain Prepetition Obligations Related thereto, and (C) Maintain Existing Business Forms, and (II) Granting Related Relief [Filed: 4/13/20] ([Docket No. 20](#)).

**Status:** This matter is going forward with respect to an interim order.

8. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [Filed: 4/13/20] ([Docket No. 21](#)).

**Status:** This matter is going forward with respect to an interim order.

9. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, (IV) Requiring Utility Providers to Return Deposits for Utility Services No Longer in Use, and (V) Granting Related Relief [Filed: 4/13/20] ([Docket No. 22](#)).

**Status:** This matter is going forward with respect to an interim order.

10. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Filed: 4/13/20] ([Docket No. 23](#)).

**Status:** This matter is going forward with respect to an interim order..

11. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Their Obligations Under Insurance Policies Entered into Prepetition and (B) Renew, Supplement, Modify or Purchase Insurance Coverage, and (II) Granting Related Relief [Filed: 4/13/20] ([Docket No. 24](#)).

**Status:** This matter is going forward with respect to an interim order.

12. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock, and (II) Granting Related Relief [Filed: 4/13/20] ([Docket No. 25](#)).

**Status:** This matter is going forward with respect to an interim order.

#### **First Day Motion Pertaining to Financing**

13. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Secured Financing Pursuant to Section 364 of the Bankruptcy Code; (II) Authorizing the Debtors to Use Cash Collateral; (III) Granting Liens and Superpriority Administrative Expense Claims; (IV) Granting Adequate Protection to the Prepetition Lenders; (V) Modifying the Automatic Stay; (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 4/13/20] ([Docket No. 26](#)).

**Status:** This matter is going forward with respect to an interim order.

#### **Sale Motions**

14. Debtors' Motion Seeking Entry of Orders (I)(A) Approving Bidding Procedures, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Establishing Procedures for the Assumption and Assignment of Contracts and Leases, (II)(A) Approving Asset Purchase Agreement Among the Debtors and the Purchaser, (B) Approving Sale of Substantially All Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Bankruptcy Code Sections 105, 363(b), (f) and (m), (C) Approving Assumption, Assignment and Sale of Certain Executory Contracts and Unexpired Leases Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Bankruptcy Code Sections 363 and 365, and (D) Determining the Amounts Necessary to Cure Such Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Filed: 4/13/20] ([Docket No. 27](#)).

**Status:** This matter will go forward on a date and time to be determined by the Court.

15. Motion to Shorten Notice and Request for Hearing with Respect to Debtors' Motion Seeking Entry of Orders (I)(A) Approving Bidding Procedures, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Establishing Procedures for the Assumption and Assignment of Contracts and Leases, (II)(A) Approving Asset Purchase Agreement Among the Debtors and the Purchaser, (B) Approving Sale of Substantially All Assets Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Bankruptcy Code Sections 105, 363(b), (f) and (m), (C) Approving Assumption, Assignment and Sale of Certain Executory Contracts and Unexpired Leases Free and Clear of All Liens, Claims, Encumbrances and Other Interests Pursuant to Bankruptcy Code Sections 363 and 365, and (D) Determining the Amounts Necessary to Cure Such Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Filed: 4/13/20] ([Docket No. 28](#)).

**Status:** This matter will go forward.

**Motion to be Scheduled:**

16. Debtors' Omnibus Motion Seeking Entry of an Order (I) Authorizing the Rejection of (A) Certain Unexpired Leases and (B) Certain Executory Contracts, Each Effective as of the Petition Date, (II) Authorizing the Abandonment of Certain Personal Property, Effective as of the Petition Date, and (III) Granting Related Relief [Filed: 4/13/20] ([Docket No. 29](#)).

**Status:** This matter will go forward on a date and time to be determined by the Court.

Dated: April 13, 2020

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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