

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

)	
In re:)	Chapter 11
)	
TZEW HOLDCO LLC, <i>et al.</i> , ¹)	Case No. 20-10910 (CSS)
)	
Debtors.)	(Jointly Administered)
)	

NOTICE OF AGENDA FOR TELEPHONIC HEARING SCHEDULED FOR MAY 7, 2020 AT 1:00 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://www.zoomgov.com/j/1609918924>

Meeting ID: 160 991 8924

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

ADJOURNED MATTER:

1. 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

¹ 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: 3405 Michelson Drive, Irvine, CA 92612.



Prepetition Lenders; (V) Modifying the Automatic Stay; (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 4/13/20] ([Docket No. 26](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET (*extended until May 4, 2020 at 4:00 p.m. for Okaloosa County, Florida and until May 5, 2020 at 4:00 p.m. for the Official Committee of Unsecured Creditors*)

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- a. [Signed] Interim Order (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: 4/14/20] ([Docket No. 59](#)).
- b. Notice of Entry of Interim Order and Final Hearing Regarding 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: 4/15/20] ([Docket No. 76](#)).

Status: The hearing with respect to the entry of a final order will be adjourned to a date to be determined.

MATTERS FOR WHICH A CNO/COC HAS BEEN FILED:

2. 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](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET

Responses Received: Informal comments from the Official Committee of Unsecured Creditors.

Related Documents:

- a. [Proposed] Final Order (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, Exhibit B](#)).

- b. [Signed] Interim Order (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: 4/14/20] ([Docket No. 50](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding 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: 4/15/20] ([Docket No. 70](#)).
- d. Certification of Counsel Regarding Revised Proposed Order (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: 5/4/20] ([Docket No. 149](#)).

Status: The Debtors have filed a revised proposed order under certification of counsel. Accordingly, no hearing on this matter is necessary unless requested by the Court.

- 3. 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](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET

Responses Received: Informal comments from the Official Committee of Unsecured Creditors and Wells Fargo.

Related Documents:

- a. [Proposed] Final Order (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](#), [Exhibit B](#)).
- b. [Signed] Interim Order (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: 4/14/20] ([Docket No. 51](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding 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: 4/15/20] ([Docket No. 71](#)).

- d. Certification of Counsel Regarding Revised Proposed Final Order (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: 5/4/20] ([Docket No. 150](#)).

Status: The Debtors have filed a revised proposed order under certification of counsel. Accordingly, no hearing on this matter is necessary unless requested by the Court.

4. 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](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- a. [Proposed] Final Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [Filed: 4/13/20] ([Docket No. 21, Exhibit B](#)).
- b. [Signed] Interim Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [Filed: 4/14/20] ([Docket No. 52](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding 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: 4/15/20] ([Docket No. 72](#)).
- d. Certification of No Objection Regarding 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: 5/4/20] ([Docket No. 153](#)).

Status: No parties have objected to the final relief requested in the Motion. Accordingly, the Debtors have filed a certification of no objection and respectfully request the entry of the final order attached to the Motion.

5. 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](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET

Responses Received: Informal comments from Official Committee of Unsecured Creditors.

- a. Objection of Florida Power & Light Company, San Diego Gas and Electric Company and Southern California Gas Company to the 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: 4/16/20] ([Docket No. 81](#)).
- (i) Notice of Withdrawal of (i) Objection Florida Power & Light Company, San Diego Gas and Electric Company and Southern California Gas Company to the 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, and (ii) Joinder Thereto [Filed: 5/1/20] ([Docket No. 141](#)).
- b. Joinder of Gulf Power Company to the Objection of Florida Power & Light Company, San Diego Gas and Electric Company and Southern California Gas Company to the 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: 4/22/20] ([Docket No. 96](#)).
- (i) Notice of Withdrawal of (i) Objection Florida Power & Light Company, San Diego Gas and Electric Company and Southern California Gas Company to the 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, and (ii) Joinder Thereto [Filed: 5/1/20] ([Docket No. 141](#)).

- c. Amended Joinder of Gulf Power Company to the Objection of Florida Power & Light Company, San Diego Gas and Electric Company and Southern California Gas Company to the 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: 4/22/20] ([Docket No. 97](#)).
 - (i) Notice of Withdrawal of (i) Objection Florida Power & Light Company, San Diego Gas and Electric Company and Southern California Gas Company to the 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, and (ii) Joinder Thereto [Filed: 5/1/20] ([Docket No. 141](#)).
- d. Objection of Atlantic City Electric Company to 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: 4/30/20] ([Docket No. 135](#)).

Related Documents:

- a. [Proposed] Final Order (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](#), [Exhibit B](#)).
- b. [Signed] Interim Order (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: 4/14/20] ([Docket No. 53](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding 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: 4/15/20] ([Docket No. 73](#)).

- d. Certification of Counsel Regarding Revised Proposed Final Order (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: 5/4/20] ([Docket No. 151](#)).

Status: The Debtors have filed a revised proposed order under certification of counsel. Accordingly, no hearing on this matter is necessary unless requested by the Court.

6. 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](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- a. [Proposed] Final Order (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, Exhibit B](#)).
- b. [Signed] Interim Order (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: 4/14/20] ([Docket No. 54](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding 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: 4/15/20] ([Docket No. 74](#)).
- d. Certification of No Objection Regarding 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: 5/4/20] ([Docket No. 154](#)).

Status: No parties have objected to the final relief requested in the Motion. Accordingly, the Debtors have filed a certification of no objection and respectfully request the entry of the final order attached to the Motion.

7. 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](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- a. [Proposed] Final Order (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, Exhibit B](#)).
- b. [Signed] Interim Order (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: 4/14/20] ([Docket No. 55](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding 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: 4/15/20] ([Docket No. 77](#)).
- d. Certification of No Objection Regarding 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: 5/4/20] ([Docket No. 155](#)).

Status: No parties have objected to the final relief requested in the Motion. Accordingly, the Debtors have filed a certification of no objection and respectfully request the entry of the final order attached to the Motion.

8. 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](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- a. [Proposed] Final Order (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, Exhibit B](#)).
- b. [Signed] Interim Order (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: 4/14/20] ([Docket No. 56](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding 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: 4/15/20] ([Docket No. 78](#)).
- d. Certification of No Objection Regarding 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: 5/4/20] ([Docket No. 156](#)).

Status: No parties have objected to the final relief requested in the Motion. Accordingly, the Debtors have filed a certification of no objection and respectfully request the entry of the order attached to the Motion.

9. Application of Debtors and Debtors In Possession Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016 and Local Bankruptcy Rules 2014-1, 2016-1 and 2016-2, for Entry of an Order Authorizing Them to Retain and Employ A&G Realty Partners, LLC as Their Real Estate Consultant and Advisor Effective as of the Petition Date and to Waive the Information Requirements of Local Rule 2016-2(d) [Filed: 4/16/20] ([Docket No. 82](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET (*extended until May 5, 2020 at 4:00 p.m. for the Office of the United States Trustee*)

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- a. [Proposed] Order Granting Application of Debtors and Debtors In Possession Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016 and Local Bankruptcy Rules 2014-1, 2016-1 and 2016-2, for Entry of an Order Authorizing Them to Retain and Employ A&G Realty Partners, LLC as Their Real Estate Consultant and Advisor Effective as of the Petition Date and to Waive the Information Requirements of Local Rule 2016-

2(d) [Filed: 4/16/20] ([Docket No. 82, Exhibit B](#)).

- b. Notice of Application of Debtors and Debtors In Possession Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016 and Local Bankruptcy Rules 2014-1, 2016-1 and 2016-2, for Entry of an Order Authorizing Them to Retain and Employ A&G Realty Partners, LLC as Their Real Estate Consultant and Advisor Effective as of the Petition Date and to Waive the Information Requirements of Local Rule 2016-2(d) [Filed: 4/16/20] ([Docket No. 82](#)).
- c. Supplemental Declaration of Andrew Graiser in Support of Application of Debtors and Debtors In Possession Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016 and Local Bankruptcy Rules 2014-1, 2016-1 and 2016-2, for Entry of an Order Authorizing Them to Retain and Employ A&G Realty Partners, LLC as Their Real Estate Consultant and Advisor Effective as of the Petition Date and to Waive the Information Requirements of Local Rule 2016-2(d) [Filed: 5/4/20] ([Docket No. 173](#)).
- d. Certification of Counsel Regarding Revised Proposed Order Granting Application of Debtors and Debtors In Possession Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016 and Local Bankruptcy Rules 2014-1, 2016-1 and 2016-2, for Entry of an Order Authorizing Them to Retain and Employ A&G Realty Partners, LLC as Their Real Estate Consultant and Advisor Effective as of the Petition Date and to Waive the Information Requirements of Local Rule 2016-2(d) [Filed: 5/5/20] ([Docket No. 174](#)).

Status: The Debtors have filed a revised proposed order under certification of counsel. Accordingly, no hearing on this matter is necessary unless requested by the Court.

- 10. Debtors' Application Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Debtors and Debtors In Possession Effective as of the Petition Date [Filed: 4/16/20] ([Docket No. 84](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET (*extended until May 5, 2020 at 4:00 p.m. for the Office of the United States Trustee*)

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- a [Proposed] Order Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Debtors and Debtors In Possession Effective as of the Petition Date [Filed: 4/16/20] ([Docket No. 84](#)).

- b. Notice of Debtors' Application Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Debtors and Debtors In Possession Effective as of the Petition Date [Filed: 4/16/20] ([Docket No. 84](#)).
- c. Certification of No Objection Regarding Debtors' Application Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Debtors and Debtors In Possession Effective as of the Petition Date [Filed: 5/4/20] ([Docket No. 157](#)).

Status: No parties have objected to the relief requested in the Application. Accordingly, the Debtors have filed a certification of no objection and respectfully request the entry of the order attached to the Application.

- 11. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to Employ and Retain Paladin Management Group, LLC to Provide a Chief Restructuring Officer and Additional Personnel to Apex Parks Group, LLC as of the Petition Date, and Limited Waiver of Del. Bankr. L.R. 2016-2 [Filed: 4/16/20] ([Docket No. 85](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET (*extended until May 5, 2020 at 4:00 p.m. for the Office of the United States Trustee*)

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- a. [Proposed] Order Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to Employ and Retain Paladin Management Group, LLC to Provide a Chief Restructuring Officer and Additional Personnel to Apex Parks Group, LLC as of the Petition Date, and Limited Waiver of Del. Bankr. L.R. 2016-2 [Filed: 4/16/20] ([Docket No. 85, Exhibit A](#)).
- b. Notice of Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to Employ and Retain Paladin Management Group, LLC to Provide a Chief Restructuring Officer and Additional Personnel to Apex Parks Group, LLC as of the Petition Date, and Limited Waiver of Del. Bankr. L.R. 2016-2 [Filed: 4/16/20] ([Docket No. 85](#)).
- c. Certification of Counsel Regarding Revised Proposed Order Granting Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to Employ and Retain Paladin Management Group, LLC to Provide a Chief Restructuring Officer and Additional Personnel to Apex Parks Group, LLC as of the Petition Date, and Limited Waiver of Del. Bankr. L.R. 2016-2 [Filed: TBD] (Docket No. TBD).

Status: The Debtors have received informal comments from the Office of the United States Trustee and expect to file a revised proposed order under certification of counsel prior to the hearing.

MATTER GOING FORWARD:

12. 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](#)).

Response Deadline: April 30, 2020, at 4:00 p.m. ET

Responses Received: Informal comments from the STORES Landlord.

Related Documents:

- a. [Proposed] 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](#), [Exhibit A](#)).
- b. Notice of Hearing on 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: 4/15/20] ([Docket No. 75](#)).
- c. [Signed] Order Partially Granting 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: 5/1/20] ([Docket No. 140](#)).

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Status: This matter will go forward.

Dated: May 5, 2020

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Timothy P. Cairns

Laura Davis Jones (DE Bar No. 2436)

David M. Bertenthal (CA Bar No. 167624)

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Proposed Counsel to the Debtors and Debtors in
Possession