

**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.	)	(Jointly Administered)
	)	
	)	

**Objection Deadline: January 22, 2021 at 5:00 p.m. (ET)  
Hearing Date: February 3, 2021 at 11:00 a.m. (ET)**

**NOTICE OF DEBTORS’ MOTION TO CONVERT CASES FROM  
CHAPTER 11 TO CHAPTER 7 OF THE BANKRUPTCY CODE**

**PLEASE TAKE NOTICE** that on December 31, 2020, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Debtors’ Motion to Convert Cases From Chapter 11 to Chapter 7 of the Bankruptcy Code* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A copy of the Motion is available for a fee via PACER at: <http://www.deb.uscourts.gov> or for free at the Debtors’ restructuring website at: <http://www.kccllc.net/apex>.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the entry of the order with respect to the relief sought in the Application must be filed with the Bankruptcy Court on or before **January 22, 2021 at 5:00 p.m. prevailing Eastern Time**.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (a) the Debtors, Apex Parks Group, LLC, 18575 Jamboree Road, Suite 600, Irvine, CA 92612, Attn: Scott Avila; (b) counsel to the Debtors, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, Delaware 19801, Attn: Laura Davis Jones, Esq.; (c) the Office of The United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington,

<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: PP Group, LLC (5579); PP Property Holdings, LLC (1013); PP Parks Beverage Company, LLC (2339); PP Parks Holdings, LLC (7913); PP Parks Management, LLC (2937); TZEW Holdco LLC (0252); TZEW Intermediate Corp. (1058). The location of the Debtors’ service address in these chapter 11 cases is: c/o Paladin Management, 633 W. 5th Street, 28th Floor, Los Angeles, CA 90071.



Delaware 19801, Attn: Linda Richenderfer, Esq.; (d) proposed counsel to the official committee of unsecured creditors, (i) Kelly Drye & Warren LLP, 101 Park Avenue, New York, New York 10178, Attn: Eric R. Wilson, Esq. and (ii) Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market Street, 16<sup>th</sup> Floor, Wilmington, Delaware 19801, Attn: Curtis Miller, Esq.; and (e) counsel to the Prepetition Agent, (i) KTBS Law LLP (*f/k/a Klee, Tuchin, Bogdanoff & Stern LLP*), 1999 Avenue of the Stars, 39<sup>th</sup> Floor, Los Angeles, California 90067, Attn: Michael L. Tuchin, Esq. and Jonathan M. Weiss, Esq. and (ii) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 N. King Street, Wilmington, Delaware 19801, Attn: Robert F. Poppiti, Jr, Esq.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE APPLICATION WILL BE HELD ON **FEBRUARY 3, 2021 AT 11:00 A.M.** BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM NO. 6, WILMINGTON, DELAWARE 19801.**

Dated: December 31, 2020

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ Timothy P. Cairns*

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