

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
FUHU, INC., *et al.*,¹) Case No. 15-12465 (CSS)
)
Debtors.) (Joint Administration Requested)

Re: Docket No. 11

**ORDER GRANTING DEBTORS' MOTION FOR AUTHORITY TO
PERFORM OBLIGATIONS NECESSARY TO MAINTAIN INSURANCE COVERAGE**

Upon the motion (the "Motion")² of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for the entry of an order (the "Order"), authorizing, but not directing, the Debtors (a) to maintain existing insurance policies and pay all premiums, deductibles, administration fees, and consulting fees arising thereunder or in connection therewith (the "Insurance Obligations"); and (b) to renew, revise, extend, supplement, change, or enter into new insurance coverage as needed in their business judgment; all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 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 that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in

¹ The Debtors, together with the last four digits of each Debtor's tax identification number, are: Fuhu, Inc. (7896); and Fuhu Holdings, Inc. (9761). The location of the Debtors' headquarters and service address is 909 N. Sepulveda Blvd., Suite 540, El Segundo, CA 90245.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.



151246515120900000000008

this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing 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 granted as set forth herein.
2. The Debtors are authorized, but not directed, to maintain their existing Insurance Policies and pay all Insurance Obligations arising thereunder or in connection therewith, on an interim basis, in an amount not to exceed \$20,000 in the aggregate for all prepetition amounts due and owing related to the Insurance Policies.
3. The Debtors are authorized, but not directed, to renew, revise, extend, supplement, change, or enter into new insurance coverage as needed in their business judgment.
4. The Debtors are authorized to continue their prepetition practice of paying fees to the Insurance Consultant in connection with their representation of the Debtors in various ongoing negotiations with the Debtors' insurance carriers.
5. Notice of the Motion satisfies the requirements of Bankruptcy Rule 6004(a).

6. A hearing (the "Final Hearing") to consider the balance of the relief requested in the Motion is scheduled for 12/30/15 at 10:00a.m. (Eastern time) before the Court. On or before 12/9/15, the Debtors shall serve, by United States mail, first-class postage prepaid, notice of the entry of this Order and of the Final Hearing (the "Final Hearing Notice"), together with copies of this Order and the Motion, on (a) the parties having been given notice of the Motion, (b) any party which has filed prior to such date a request for notices with the Court, and (c) counsel to any statutory committee appointed in these chapter 11 cases. The Final Hearing Notice shall state that any party in interest objecting to the entry of the proposed supplemental Order shall file written objections with the Clerk of Court no later than on 12/23/15, at 4:00 p.m. (Eastern time), which objections shall be served so as to be received on or before such date by (a) proposed counsel to the Debtors, (i) Bryan Cave LLP, One Metropolitan Square, 211 North Broadway, St. Louis, MO 63102, Attn: Brian C. Walsh, Esq., and (ii) Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067, Attn: Jeffrey N. Pomerantz and 919 North Market Street, 17th Floor, Wilmington, DE 19801, Attn: Michael R. Seidl, (b) the U.S. Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Linda Casey, Esq., (c) counsel to Obsidian Agency Services, Inc., as Agent, (i) Goldberg Kohn Ltd., 55 East Monroe, Suite 3300, Chicago, IL 60603, Attn: Jeremy M. Downs and Zachary J. Garrett, and (ii) Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, P.O. Box 1347, Wilmington, DE 19899, Attn: Robert J. Dehney and Curtis S. Miller and (d) all parties entitled to notice pursuant to Bankruptcy Rule 2002.

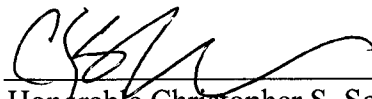
7. Notwithstanding anything in this Order to the contrary, the payments authorized by, and any authorizations contained in, this Order are subject to the respective terms and requirements set forth in any order authorizing use of cash collateral.

8. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

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

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

Dated: December 9, 2015



Honorable Christopher S. Sontchi
United States Bankruptcy Judge