

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

In re: ) Chapter 11  
)  
FUSE, LLC, *et al.*,<sup>1</sup> ) Case No.: 19-10872 (KG)  
)  
\_\_\_\_\_ Debtors. ) (Joint Administration Requested)

**NOTICE OF AGENDA FOR HEARING ON FIRST DAY MOTIONS  
SCHEDULED FOR APRIL 24, 2019 AT 11:30 A.M. (PREVAILING EASTERN TIME),  
BEFORE THE HONORABLE KEVIN GROSS AT  
THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF  
DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 6TH FLOOR,  
COURTROOM NO. 3, WILMINGTON, DELAWARE 19801<sup>2</sup>**

**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. Voluntary Petitions:
  - A. Fuse Media, Inc.
  - B. Fuse Media, LLC
  - C. Fuse, LLC
  - D. JAAM Productions, LLC
  - E. SCN Distribution, LLC
  - F. Latino Events LLC
  - G. Fuse Holdings LLC
  - H. Fuse Finance, Inc.
  - I. FM Networks LLC

<sup>1</sup> The Debtors and the last four digits of their taxpayer identification numbers include: Fuse Media, Inc. (9721); Fuse Media, LLC (0560); Fuse, LLC (1888); JAAM Productions, LLC (5499); SCN Distribution, LLC (9656); Latino Events LLC (8204); Fuse Holdings LLC (5673); Fuse Finance, Inc. (8683); and FM Networks LLC (6500). The Debtors' headquarters and service address is 700 North Central Avenue, Suite 600, Glendale, CA 91203.

<sup>2</sup> Any party who wishes to attend telephonically is required to make arrangements through CourtCall by telephone (866-582-6878) or by facsimile (866-533-2946).



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**First Day Declaration**

2. Declaration of Miguel Roggero in Support of First Day Motions [Filed 4/23/19] (Docket No. 3)

**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 for Order Directing Joint Administration of Related Chapter 11 Cases for Procedural Purposes Only [Filed 4/23/19] (Docket No. 2)

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

4. Debtors' Motion for Order (I) Authorizing the Debtors to File (A) Consolidated List of Creditors and (B) Consolidated List of Debtors' Top Thirty Unsecured Creditors; and (II) Granting Related Relief [Filed 4/23/19] (Docket No. 4)

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

5. Application for an Order Appointing Kurtzman Carson Consultants LLC as Claims and Noticing Agent for the Debtors Pursuant to 28 U.S.C. § 156(C), 11 U.S.C. § 105(A) and LBR 2002-1(F) [Filed 4/23/19] (Docket No. 5)

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

**First Day Motions Pertaining to Operations and Related Issues**

6. Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay and Honor Prepetition Compensation, Reimbursable Business Expenses, and Employee Benefit Obligations; and (B) Maintain and Continue Certain Compensation and Benefit Programs Postpetition; and (II) Granting Related Relief [Filed 4/23/19] (Docket No. 6)

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

7. Debtors' Motion for Order Under Sections 105, 345, 363, 364, 503, 1107 and 1108 of the Bankruptcy Code Authorizing (I) Maintenance of Existing Bank Accounts; (II) Continuance of Existing Cash Management System, Bank Accounts, Checks and Related Forms; (III) Continued Performance of Intercompany Transactions; (IV) Limited Waiver of Section 345(b) Deposit and Investment Requirements and (V) Granting Related Relief [Filed 4/23/19] (Docket No. 7)

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

8. Debtors' Motion for Entry of an Order (A) Authorizing Debtors to Pay Prepetition Claims of Critical Vendors and (B) Granting Related Relief [Filed 4/23/19] (Docket No. 8)

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

9. Debtors' Motion Pursuant to Sections 105(a), 507(a)(8), and 541(d) of the Bankruptcy Code for an Order Authorizing the Payment of Prepetition Sales and Franchise Taxes and Similar Taxes and Fees [Filed 4/23/19] (Docket No. 9)

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

10. Debtors' Motion for Interim and Final Orders (A) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (B) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services, (C) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (D) Granting Related Relief [Filed 4/23/19] (Docket No. 10)

**Status:** This matter is going forward for entry of an interim order.

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

11. Motion of Debtors Pursuant to Sections 105, 361, 362, 363, 503 and 507 of the Bankruptcy Code, Bankruptcy Rules 2002, 4001 and 9014 and Local Rules 2002-1(b), 4001-2, 9013-1(m) for Entry of Interim and Final Orders, (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing [Filed 4/23/19] (Docket No. 11)

**Status:** This matter is going forward for entry of an interim order.

#### **Solicitation Motion**

12. Debtors' Motion for Entry of an Order (I) Scheduling Combined Hearing On (A) Adequacy of Disclosure Statement, (B) Confirmation of Prepackaged Plan of Reorganization, and (C) the Assumption of Executory Contracts and Cure Amounts; (II) Fixing the Deadlines to Object to Disclosure Statement, Prepackaged Plan, and Proposed Assumption or Rejection of Executory Contracts and Cure Amounts; (III) Approving (A) Prepetition Solicitation Procedures and (B) Form and Manner of Notice of Commencement, Combined Hearing, Assumption of Executory Contracts and Cure Amounts Related Thereto, and Objection Deadlines; (IV) Conditionally (A) Directing the United States Trustee Not to Convene Section 341(a) Meeting of Creditors and (B) Waiving Requirement of Filing Statements of Financial Affairs and Schedules of Assets and Liabilities; and (V) Granting Related Relief [Filed 4/23/19] (Docket No. 12)

Related Pleadings:

- A. Debtors' Prepackaged Joint Plan of Reorganization [Filed 4/23/19] (Docket No. 13)
- B. Disclosure Statement for the Debtors' Prepackaged Joint Plan of Reorganization [Filed 4/23/19] (Docket No. 14)
- C. Plan Supplement [Filed 4/23/19] (Docket No. 15)

**Status:** This matter will be going forward.

Dated: April 23, 2019

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/s/ James E. O'Neill

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