

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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*In re:* : Chapter 11  
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**HERITAGE HOME GROUP LLC, et al.,** : Case No. 18-11736 (KG)  
 :  
 Debtors.<sup>1</sup> : Jointly Administered  
 :  
 : **Hearing Date: August 27, 2018 at 1:30 p.m. (ET)**  
 : **Objection Deadline: August 20, 2018 at 4:00 p.m. (ET)**  
 : **Ref. Docket No. 13**  
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**NOTICE OF MOTION**

TO: (I) THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (II) COUNSEL TO PNC BANK, NATIONAL ASSOCIATION, IN ITS CAPACITY AS PRE-PETITION AGENT AND DIP AGENT; (III) COUNSEL TO KPS SPECIAL SITUATIONS FUND III (A), L.P., IN ITS CAPACITY AS PRE-PETITION TERM AGENT; (IV) THE PARTIES INCLUDED ON THE DEBTORS' CONSOLIDATED LIST OF THIRTY (30) LARGEST UNSECURED CREDITORS, AS FILED WITH THE DEBTORS' CHAPTER 11 PETITIONS; (V) THE STALKING HORSE BIDDER (AS DEFINED IN THE MOTION); (VI) THE SECURITIES & EXCHANGE COMMISSION; (VII) THE OFFICE OF THE UNITED STATES ATTORNEY GENERAL FOR THE DISTRICT OF DELAWARE; (VIII) THE INTERNAL REVENUE SERVICE; (IX) THE U.S. DEPARTMENT OF JUSTICE; (X) THE OFFICES OF THE ATTORNEYS GENERAL FOR THE STATES IN WHICH THE DEBTORS OPERATE; AND (XI) ALL PARTIES WHO HAVE REQUESTED NOTICE IN THESE CHAPTER 11 CASES PURSUANT TO BANKRUPTCY RULE 2002.

On July 29, 2018, the above captioned debtors and debtors in possession (collectively, the "Debtors") filed the **Debtors' Motion for Orders: (I) Approving (A) Bidding Procedures for the Sale of Debtors' Assets Related to the Luxury Brands Business; (B) Form and Manner of Notices; (C) Form of Asset Purchase Agreement, Including Bid Protections; (II) Scheduling Dates to Conduct Auction and Hearing to Consider Final Approval of Sale, Including Treatment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief; and (IV)(A) Approving the Sale of the Acquired Assets; (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, as applicable, are: Heritage Home Group LLC (9506); HH Global II B.V. (0165); HH Group Holdings US, Inc. (7206); HHG Real Property LLC (3221); and HHG Global Designs LLC (1150). The Debtors' corporate headquarters is located at 1925 Eastchester Drive, High Point, North Carolina 27265.



**Leases; and (C) Granting Related Relief [Docket No. 13] (the “Motion”). A copy of the Motion is being served concurrently herewith.**

**PLEASE TAKE FURTHER NOTICE** that any objections or responses to the relief requested in the Motion **solely with respect to proposed bidding procedures** must be filed on or before **August 20, 2018 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801. At the same time, copies of any responses or objections to the Motion must be served upon the proposed undersigned counsel to the Debtors so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION SOLELY WITH RESPECT TO PROPOSED BIDDING PROCEDURES WILL BE HELD ON AUGUST 27, 2018 AT 1:30 P.M. (ET) BEFORE THE HONORABLE KEVIN GROSS IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE MOTION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED THEREIN WITHOUT FURTHER NOTICE OR A HEARING.**

Dated: August 6, 2018  
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Jaime Luton Chapman

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*Proposed Counsel to the Debtors and  
Debtors in Possession*